

 <p><b>QUEENSLAND CONSUMERS ASSOCIATION</b></p>	<p><b>A non-profit, volunteer organisation, advocating to advance the interests of consumers in Queensland</b></p> 
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3 May 2022

## **SUBMISSION ON PROPOSAL M1019** **REVIEW OF SCHEDULE 22 – FOODS AND CLASSES OF** **FOODS (2021)**

### **BACKGROUND**

The Queensland Consumers' Association (the Association) is a non-profit organisation established over 40 years ago and which exists to advance the interests of Queensland consumers. The Association's members work in a voluntary capacity and specialise in particular policy areas.

The Association is a member of the Consumers' Federation of Australia, the peak body for Australian consumer groups, and works closely with many other consumer and community groups.

The Association has a strong interest in consumer food issues and a member is the Consumers Federation of Australia's representative on FSANZ's Consumer and Public Health Dialogue.

Therefore, the Association welcomes the opportunity to participate in this consultation.

The contact person is Ian Jarratt, email [ijarratt@australiamail.com](mailto:ijarratt@australiamail.com)

### **GENERAL COMMENTS**

1. We strongly support the decision to conduct this review.
2. We agree that the preferred option is Option 3 – A hybrid version of the existing Schedule 22 with the Codex system which:
  - will allow Schedule 22 to remain in the Code
  - provide flexibility, especially with regard to MRL setting
  - result in the Schedule, being more aligned to Codex and the APVMA
  - reduce inconsistencies and ambiguity
  - will improve stakeholder interactions and jurisdictional regulation.
3. We note that section 1.1 of the Administrative Assessment states that "The Codex Alimentarius has not yet completed their revision of commodity descriptions for animal and processed food commodities". We request therefore that when the revision has been completed, if changes to the Code are considered desirable that they be identified, consulted on, and made as quickly as possible.

### **SPECIFIC COMMENTS**

We do not have any specific responses to the seven questions in the Administrative Assessment.