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17 August 2023

The Chair

Food Standards Australia New Zealand

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Call for submissions – A1243 Harmonisation of marine biotoxin standards for bivalve shellfish

Application A1243 *Harmonisation of marine biotoxin standards for bivalve shellfish* seeks to align the current maximum levels (MLs) in Schedule 19 of the Australia New Zealand Food Standards Code for two biotoxins, diarrhetic shellfish toxins (DST) and paralytic shellfish toxins (PST), with Codex Standard CAC 292-2008 Standard for Live and Raw Bivalve Molluscs and the New Zealand Regulated Control Scheme - Bivalve Molluscan Shellfish for Human Consumption.

As an Australian Shellfish Quality Assurance Advisory Committee (ASQAAC) member, the Department of Natural Resources and Environment Tasmania (NRE Tas) participated in and contributed to the preparation of the SafeFish application contained in A1243.

NRE Tas considers the SafeFish application and proposal provides alignment with international standards, ensures the currency of food standards by utilising the most recently available data to inform decision making and further reduces the risk of adverse health events for the community.

Tasmania, in comparison to other jurisdictions, has a high biotoxin risk rating and can therefore be considered at an elevated risk of biotoxin detections, regardless of a change in the biotoxin MLs.

From the additional data supplied to update the SafeFish application to encompass the monitoring period from 2018-2022, a change to the MLs would equate to a potential additional 3.5 PST closures in shellfish growing areas per year in Tasmania, with each closure affecting one oyster growing area for one week per year.

Although there would be potential for an increase in shellfish growing area closures, the progressive weekly biotoxin monitoring arrangements in Tasmania facilitate shellfish growing areas re-opening as soon as possible due to the more agile and responsive biotoxin monitoring program in place.

NRE Tas supports the unanimous ASQAAC view that whilst there will be an impact across the

Australian shellfish industry, this impact is considered minimal in comparison to the overall health protection measure provided by harmonisation of the MLs.

We would like to thank the Board of FSANZ for the opportunity to provide comment on this important application submitted by SafeFish on behalf of ASQAAC.

