

Wednesday, 16 August 2023

Submissions
Food Standards Australia
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RE: Application A1243 Harmonisation of marine biotoxin standards for bivalve shellfish

To whom it may concern,

I would like to submit one clarifying and one correcting comment in relation to Application A1243 Harmonisation of marine biotoxin standards for bivalve shellfish. This submission relates to Questions 2 and 4 in the public call for comment.

1. Clarification of reporting units used historically in Australia, with potential to impact the interpretation of Supporting Document 1 Known Cases

In relation to Australian marine biotoxin standards for PST, I am aware that there is some confusion around the reporting units used in Australia in the past. I would like to clarify that prior to 2012, Australia was using methods of analysis that gave results in mg STX.2HCl equiv./kg, i.e. in alignment with Codex. At the time these would have been reported as mg/kg or ug/100g.

It was only in 2012 when a specialist national marine biotoxin facility was set up that the reporting unit was changed to mg STX equiv./kg, as a literal interpretation of what is specified in the Code.

2. Corrections to Supporting Document 2 Costs and Benefits

Section 5.4.4.1 lists the average number of additional detections per year on page 8. The data presented is derived from Tables 3 and 4, however there are some flaws in these tables.

Firstly, the periods of concern are 11 years for data collected from 2012-2022 (as opposed to the 9 years stated), and 7 years for data collected from 2012-2017 (as opposed to the 5 years listed). The data supplied is inclusive of the dates given, not exclusive.

Secondly, Table 4 contains errors in for the Victorian and Tasmanian data as highlighted in the table below. Victorian exceedances were 2 only for both the current and proposed ML (rather than the 8 stated). The total number of samples exceeding the proposed limit for PST in Tasmania should be 373, not the 420 published. This is made up of 309 from 2012-2017 and 64 from 2018-2022. The correct total number of additional closures in Tasmania is 4.5 per year, bringing the national total to 5 per year.

Table 4 – Estimated number of additional detections per year of PST by state (corrected)

	NSW (2012 to 2022)	SA (2012 to 2017)	Tas (2012 to 2022)	WA (2012 to 2022)	Vic (2012 to 2017)	Total
Total number of samples tested over time period	5,004	292	10,242	378	257	16,173
Total number of samples exceeding existing limit	19	7	319	1	2	354
Samples exceeding existing limit (%)	0.38%	2.40%	3.11%	0.26%	3.11%	4.20%
Total number of samples exceeding proposed limit	25	7	373	1	2	461
Samples exceeding proposed limit (%)	0.50%	2.40%	4.10%	0.26%	3.11%	2.85%
Number of additional detections per year	+0.5	-	+4.5	-	-	+5.0

Note: data from QLD, NT, and ACT excluded from estimate due to low number of samples

Kind regards

