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Standards Management Officer
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Dear Sir / Madam

Submission – Proposal M1012 – Amendments to Standard 1.4.2

Thank you for the opportunity to provide a submission on the Call for Submission paper for Proposal M1012.

This submission provides technical advice and comments in relation to the proposed maximum residue limits for coumatetralyl and warfarin in some pork commodities. It was prepared with the advice of officers from Queensland Department of Agriculture and Fisheries (DAF), Safe Food Production Queensland (SFPQ) and Queensland Department of Health. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government should notification be made by the FSANZ Board to the Australia and New Zealand Ministerial Forum on Food Regulation.

Within the Queensland Government, DAF, SFPQ and the Department of Health have roles in the regulation of agricultural and veterinary chemicals and their residues in food. DAF regulates the use of agvet chemicals during primary production as well as regulates and monitors agvet chemical residues. The role of SFPQ includes regulating the production and processing of food under a meat food safety scheme. SFPQ work where necessary with their accreditation holders to ensure their products comply with legislated maximum residue limits (MRLs). The Department of Health is responsible for enforcement and compliance activities in relation to food sold to consumers, including MRLs, and is primarily responsible for human health issues.

The current proposal is inconsistent with the previous approach taken by FSANZ of not including rodenticide residues in food. Furthermore, this was recently reaffirmed with Proposal P1027 - Managing Low-level Ag & Vet Chemicals without Maximum Residue Limitsⁱ, which excluded “highly toxic products, such as rodenticides” from the scope of proposal. On the other hand it is recognised that it is an established APVMA policyⁱⁱ to require residue data for animal housing

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treatments and where residues occur to set MRLs for animal commodities. The setting of MRLs for rodenticides is analogous to animal housing treatments.

The ideal scenario is that pig products do not contain detectable rodenticide residues. However, our understanding from interstate control of use authorities is that the use of the rodenticides has been according to label instructions. Consequently, there may be an assumption detectable residues occur even when label instructions are followed. However, when considering whether setting MRLs for the two rodenticides is an appropriate management strategy, it would be useful for evidence to be provided that demonstrates residues will occur through normal lawful use of the rodenticides following the labelling directions and that the labelling directions are adequate.

As indicated in the Executive Summary of the FSANZ proposal, as part of the MRL setting process FSANZ has made a sanitary and phytosanitary notification to the World Trade Organisation (WTO) of the proposed MRLs. Consequently Australia's trading partners are notified of the proposed MRLs. It is important that our trading partners have confidence in Australian risk assessments processes. The trade of Australian agricultural produce is facilitated by dietary risk assessments that are conducted according to the internationally harmonised approach.

The current assessment methodologies were developed by the International Union and Pure and Applied Chemists (IUPAC) and adopted by the Joint Meeting on Pesticide Residues (JMPR), which is the technical committee that proposes MRLs for the Codex Alimentarius. Accordingly it is important that Australian dietary risk assessments conform to the accepted methodology so that our trading partners may have confidence in Australian produced agricultural commodities. Therefore, the risk assessment should include a commentary on the acute dietary risk and consider sub-populations, such as consumers of pig liver, for chronic dietary risk assessment in relation to the proposed MRLs. Furthermore, health authorities need to be made aware of any sub-populations that may potentially suffer adverse effects (such as haemophiliacs and patients on blood thinning medications) that consume a greater proportion of pork commodities than the general population.

The Queensland Department of Health is concerned that the proposed MRLs provide de facto permission for the misapplication of the rodenticides in and around piggeries and may encourage poor agricultural practices in relation to these chemicals. Permitting residues may not help promote investigation into the root causes of contamination events and lead to the continuation of poor practices rather than drive any necessary reforms.

Calculations undertaken by the Queensland Department of Health indicate some consumers may exceed the tolerable daily intake of Coumatetralyl, based on the information provided in Supporting Document 1. Very little information has been provided in the Call for Submission Report and Supporting Document 1 justifying assertions by FSANZ (from the dietary exposure assessments) that the proposed limits do not present public health and safety concerns in relation to relevant health-based guidance values (Acceptable Daily Intake and Acute Reference Dose).

As such, the information provided is insufficient to enable the Queensland Department of Health to be comfortable that the risks are satisfactory for the population in general, sub-populations with a high consumption of pork commodities and patients prescribed anti-coagulants. Accordingly it would be appreciated if the health risk assessment and relevant data could be published or provided to the Queensland Department of Health to allow the Department to be satisfied the proposed residue limits do not present a health risk.

From a health sector perspective, concern is expressed with the proposed approach of setting residue limits for the reasons outlined above. However, from agricultural and primary production and processing perspectives the proposed approach of setting temporary MRLs for these rodenticides to address inadvertent low level contamination of pork commodities may be satisfactory on the basis that:

- despite good agricultural practices being adopted on farms it is recognised that, from time to time, chemicals used in the management of primary production activities may result in residues being detected on food commodities
- not establishing MRLs in the Code, with the default therefore being zero, could result in pork commodities periodically triggering the default of zero, possibly even when chemical use was in accordance with label instructions
- the finalised dietary and risk assessments must be adequate (as discussed above, including at-risk subpopulations) and indicate the proposed levels do not present any risks to public health and safety
- the MRLs must be temporary in nature, that is not longer than 12 months
- the Meat Implementation Working Group clearance protocol for piggeries affected by rodenticides should assist in managing the release for sale of any pork commodities contaminated with coumatetralyl or warfarin.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Health Protection Unit, Department of Health on (07) 3328 9310 or at foodsafety@health.qld.gov.au

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ⁱ FSANZ, Consultation Paper – Proposal P1027, 16 December 2014, page 8

ⁱⁱ APVMA, Data guideline on Control of Pest Species in Animal Housing (Residues), 1/7/14
(<http://apvma.gov.au/node/1014>)