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File Ref: QCHO/5560

10 February 2015

Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610

Dear Sir / Madam

**Submission – Proposal P1016 – Hydrocyanic acid in apricot kernels and other foods**

Thank you for the opportunity to provide a submission on the Call for Submissions paper for Proposal P1016.

This submission provides technical advice and comments related to this issue. It was prepared with the advice of officers from Queensland Department of Agriculture, Fisheries and Forestry (DAFF) and Safe Food Production Queensland (SFPQ). 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.

As discussed in the Call for Submissions paper, one of the reasons apricot kernels have been consumed is as a cancer treatment, even though the efficacy has not been proven. The regulatory options discuss the proposed prohibition on the sale of unhulled and hulled raw apricot kernels. However, if these are not legally available, it may be possible that raw apricot kernel skin (that is, the seed coat) could potentially be sought as an alternative product that is high in Laetrile. As such, it may be important the options also consider the potential sale of raw apricot kernel skin. However, it is noted that the proposed draft variation to the Food Standards Code includes "raw apricot kernels or any substance derived therefrom".

It is acknowledged that cooking apricot kernels should reduce the level of hydrocyanic acid. However, Section 2.1.1 of the Call for Submissions paper (page 7) states "there are multiple published cases of adult and child cyanide poisoning resulting from eating cooked and/or ground apricot kernels". The Call for Submissions and the supporting documents do not discuss the risks associated with cooked apricot kernels or provide any information in relation to the published cases referred to of cyanide poisoning from eating cooked apricot kernels. An issue to consider could include whether light roasting of apricot kernels makes them safe to consume. If there is a

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risk from eating cooked or partly cooked apricot kernels then consideration should to be given to prescribing a maximum limit for hydrocyanic acid in heat treated apricot kernels.

If the recommended regulatory measure is accepted and the sale of raw hulled and unhulled apricot kernels is prohibited (with the exceptions noted in the FSANZ Call for Submissions paper), it will still be possible for consumers to purchase fresh whole apricots to obtain raw apricot kernels. As such, consideration would need to be given to maintaining some authoritative information for the public on the FSANZ or Commonwealth Department of Health website warning of the dangers of consuming apricot kernels.

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](mailto:foodsafety@health.qld.gov.au)

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