

submissions

From: [REDACTED]
Sent: Thursday, 2 June 2016 12:29 PM
To: submissions
Cc: [REDACTED]
Subject: Submission - Proposal P1027 Managing Low-Level Ag & Vet Chemicals without MRLs

Safe Food Production Queensland (Safe Food) provides the following comments regarding Proposal P1027:

Safe Food supports the draft variations to the Code relating to the 'piloted' 19 agvet chemicals and agrees with FSANZ not adopting the default MRL option to address 'zero tolerance' to the presence of low level inadvertent agvet chemical residues in food commodities. As noted in the Call for Submissions, implementing a default MRL would not take into account improving rates of detection for chemical compounds in food. A level such as 0.01 would be too arbitrary in this regard.

Safe Food also notes that the Proposal does not account for the accumulation of ag-vet chemicals in animals intended for food, and therefore the status quo will remain in place for animal products.

The documentation provided notes that the proposed revised principles and processes would be applied to additional agvet chemicals overtime, on a case-by-case basis. However, it is unclear from the documentation provided how this will occur, particularly where a non-compliant agvet chemical residue is detected in a food commodity (as outlined in the scenario noted on page 16 of the Call for Submissions). It is therefore recommended that FSANZ engage with regulatory agencies regarding the consistent implementation and application of the risk assessment approach, which particular reference to the 'notified agvet chemicals' referred to in Figure 2 of the Call for Submissions.

Regards

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