



5/05/2022

APVMA Submission on Proposal M1019, the Review of Schedule 22 – Foods and classes of foods

The Australian Pesticides and Veterinary Medicines Authority (APVMA) fully supports the approach to amend Schedule 22 (Foods and classes of food) so that the food classifications for food commodities of plant origin in Schedule 22 are aligned with the current Codex Classification of Foods and Animal Feeds. This change will allow for increased harmonisation of commodity definitions and Maximum Residue Limits (MRLs) between Australia and our trading partners.

The APVMA [crop group](#) lists and our process for establishing Maximum Residue Limits (MRLs) for AgVet Chemicals for APVMA approved use patterns are also based upon the current Codex Classification of Foods and Animal Feeds. The proposed changes to Schedule 22 therefore will allow for more consistency in the commodity definitions and MRLs between the [Agricultural and Veterinary Chemicals Code \(MRL Standard\) Instrument 2019](#) and Schedule 20 of the Food Standards Code which both lists MRLs for AgVet Chemicals within Australia.

The APVMA notes that there are a number of differences between the proposed Schedule 22 list and the current Codex Classification of Foods and Animal Feeds and/or the APVMA crop group lists. Most of these differences are minor and are not expected to result in a significant difference to interpretation and the APVMA will not comment further on these differences, except for olives and oilseeds.

The APVMA recommends further consideration of appropriate consequential amendments to MRLs for Olives and Oilseeds to ensure the existing coverage is maintained for all APVMA approved uses. Also, the APVMA recommends that FSANZ consider amending the proposed portion of the commodity the MRL applies to for oilseeds from “unless otherwise specified, seed or kernels, with shell or husk” to “Unless specified, seed or kernels, after removal of shell or husk”. The commodity definition for oilseeds specified in Table 2 of the Agricultural and Veterinary Chemicals Code (MRL Standard) Instrument 2019 is “Unless specified, seed or kernels, after removal of shell or husk”. If FSANZ was to proceed with this proposed change to the commodity portion definition for Oilseeds, further consideration is recommended to ensure that existing MRLs remain appropriate for all oilseeds. The APVMA will be happy to work with FSANZ further on the consequential amendments to Schedule 20 required as a result of the proposed changes to Schedule 22.

Yours sincerely