

30 May 2016

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604

RE: Proposal P1027 - Managing Low-level Ag & Vet Chemicals without MRLs

To whom it may concern

I write in response to a request for comments on the abovementioned proposal.

National Working Party on Grain Protection

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP).

The NWPGP:

- Is the industry body responsible for providing management and leadership to industry in the areas of post-harvest storage, chemical use, market requirements and chemical regulations.
- Is facilitated by Grain Trade Australia.
- Has members across the entire grain supply chain.
- Hosts an annual forum providing participants with the latest research and developments, in the area of post-harvest storage and hygiene, chemical usage and outturn tolerances, international and domestic market requirements, and regulations.
- Co-ordinates and provides government with industry views on chemicals in use on grain and associated products.
- For further details, refer to <http://www.graintrade.org.au/nwpgp>

General Comments on P1027

The NWPGP agrees with the proposal in the Paper to adopt an *“All other foods except animal food commodities MRL to address ‘zero tolerance’ to the presence of low level inadvertent Agvet chemical residues in food commodities”*. Adoption of an MRL as proposed will greatly assist trade, and importantly, is not expected to lead to safety or public health concerns.

The NWPGP notes the issues raised by industry in the first round of submissions and accepts the response to each of those issues as noted in the consultation paper from FSANZ.

Specific Chemical Comments - Spinosad

It is acknowledged that the Risk Assessment process involves a range of steps, including but not limited to:

- *“Stage 2 (exposure assessment phase) - an estimate of the dietary exposure resulting from all food permissions including the proposed All other foods except animal food commodities MRLs was calculated for each of the Agvet chemicals that passed the Stage 1 screening criteria. This stage used the dietary exposure assessment approach developed in consultation with the APVMA which includes key principles to establish All other foods except animal food commodities MRL values on a case-by-case basis for each Agvet chemical in the selected list of Agvet chemicals” and*
- *“The assessment considered current estimates of dietary exposure from existing MRL permissions and a conservative 'worst case' assessment of the potential additional contribution to dietary exposure from All other foods except animal food commodities MRLs”.*

The outcome of the review for Spinosad is a proposed MRL for All other foods except animal food commodities of 0.01mg/kg. We note that a few of the existing Spinosad MRLs are at this MRL, with several others significantly higher.

It is noted that *“An All other foods except animal food commodities MRL of 0.1 mg/kg could have been used as this represents a contribution of 23% to total dietary exposure. However, this level is considered unacceptable as it is considerably higher than the lowest existing MRLs for Spinosad and may encourage off-label use”.*

The NWPGP agrees that an MRL of 0.1mg/kg is not warranted under the policy principles of setting an MRL for All other foods except animal food commodities.

Further it is noted that *“Establishing the All other foods except animal food commodities MRL at 0.01 mg/kg, represents a contribution of 3% to total dietary exposure and is well within the target and considered acceptable”.*

There are many export markets where various grain commodity MRLs for Spinosad are higher than 0.01mg/kg. This can create issues for industry where inadvertent contamination through the supply chain may arise.

Given the relatively low contribution to the diet of an MRL of 0.01mg/kg, we request that consideration be given to adoption of a slightly higher MRL, while still remaining within scope of the policy principles, especially not promoting off-label use of this chemical.

Thank you for your consideration of this submission.

Yours sincerely



Gerard McMullen
Chair NWPGP