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Food Standards Australia New Zealand (FSANZ)
PO Box 7186
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To whom it may concern:

SUBJECT: CANADA'S COMMENTS ON FOOD STANDARDS AUSTRALIA NEW ZEALAND (FSANZ) PROPOSAL P1027 MANAGING LOW-LEVEL AGRICULTURAL AND VETERINARY CHEMICALS WITHOUT MAXIMUM RESIDUE LIMITS

Canada appreciates the opportunity to comment on FSANZ's consultation paper referenced in the Proposal P1027 dated December 16, 2014.

We are supportive of setting Maximum Residue Limits (MRL) for 'all other food' as outlined in the Consultation Paper to recognize the low-level inadvertent presence of agricultural and veterinary chemicals in food commodities. The current 'zero tolerance' approach presently places a significant commercial risk on industry as detection technology advances and 'zero' becomes increasingly difficult to define. The proposed revision of Standard 1.4.2 of the Code would instead establish a scientific-based human health outcome to ensure food safety and facilitate trade, which Canada supports.

Additionally, Australia's initiative to alter its current 'zero-tolerance' approach would set an example for other markets to implement risk-based regulatory approaches for the detection of inadvertent low-level residues on food commodities. We would welcome the opportunity to be informed on the outcome of the consultation.

Yours sincerely,

Director
Market Access Secretariat - Asia and Oceania Division

Canada

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