

**4-04**  
**26 May 2004**

## **FINAL ASSESSMENT REPORT**

**PROPOSAL P281**

**ANOMALIES IN  
STANDARD 1.4.2 – MAXIMUM RESIDUE LIMITS**

## FOOD STANDARDS AUSTRALIA NEW ZEALAND (FSANZ)

FSANZ's role is to protect the health and safety of people in Australia and New Zealand through the maintenance of a safe food supply. FSANZ is a partnership between ten Governments: the Commonwealth; Australian States and Territories; and New Zealand. It is a statutory authority under Commonwealth law and is an independent, expert body.

FSANZ is responsible for developing, varying and reviewing standards and for developing codes of conduct with industry for food available in Australia and New Zealand covering labelling, composition and contaminants. In Australia, FSANZ also develops food standards for food safety, maximum residue limits, primary production and processing and a range of other functions including the coordination of national food surveillance and recall systems, conducting research and assessing policies about imported food.

The FSANZ Board approves new standards or variations to food standards in accordance with policy guidelines set by the Australia and New Zealand Food Regulation Ministerial Council (Ministerial Council) made up of Commonwealth, State and Territory and New Zealand Health Ministers as lead Ministers, with representation from other portfolios. Approved standards are then notified to the Ministerial Council. The Ministerial Council may then request that FSANZ review a proposed or existing standard. If the Ministerial Council does not request that FSANZ review the draft standard, or amends a draft standard, the standard is adopted by reference under the food laws of the Commonwealth, States, Territories and New Zealand. The Ministerial Council can, independently of a notification from FSANZ, request that FSANZ review a standard.

The process for amending the *Australia New Zealand Food Standards Code* is prescribed in the *Food Standards Australia New Zealand Act 1991* (FSANZ Act). The diagram below represents the different stages in the process including when periods of public consultation occur. This process varies for matters that are urgent or minor in significance or complexity.



### **Final Assessment Stage (s.36)**

FSANZ has now completed the assessment of this Proposal and held a single round of public consultation under section 36 of the FSANZ Act. This Final Assessment Report and its recommendations have been approved by the FSANZ Board and notified to the Ministerial Council.

If the Ministerial Council does not request FSANZ to review the draft amendments to the Code, an amendment to the Code is published in the *Commonwealth Gazette* and the *New Zealand Gazette* and adopted by reference and without amendment under Australian State and Territory food law.

In New Zealand, the New Zealand Minister of Health gazettes the food standard under the New Zealand Food Act. Following gazettal, the standard takes effect 28 days later.

### **Further Information**

Further information on this Proposal and the assessment process should be addressed to the FSANZ Standards Management Officer at one of the following addresses:

**Food Standards Australia New Zealand**  
**PO Box 7186**  
**Canberra BC ACT 2610**  
**AUSTRALIA**  
**Tel (02) 6271 2222**  
**[www.foodstandards.gov.au](http://www.foodstandards.gov.au)**

**Food Standards Australia New Zealand**  
**PO Box 10559**  
**The Terrace WELLINGTON 6036**  
**NEW ZEALAND**  
**Tel (04) 473 9942**  
**[www.foodstandards.govt.nz](http://www.foodstandards.govt.nz)**

Assessment reports are available for viewing and downloading from the FSANZ website [www.foodstandards.gov.au](http://www.foodstandards.gov.au) or alternatively paper copies of reports can be requested from FSANZ's Information Officer at [info@foodstandards.gov.au](mailto:info@foodstandards.gov.au) including other general enquiries and requests for information.

# CONTENTS

<b>EXECUTIVE SUMMARY AND STATEMENT OF REASONS .....</b>	<b>6</b>
STATEMENT OF REASONS.....	6
<b>1. INTRODUCTION.....</b>	<b>8</b>
1.1 SUMMARY OF MRLS UNDER CONSIDERATION .....	8
1.1.1 <i>Changes to MRLs</i> .....	8
1.1.2 <i>Anomalies in ‘T’ or ‘*’</i> .....	9
1.1.3 <i>Antibiotic MRLs</i> .....	9
1.1.4 <i>ERLs and MRLs for Lindane</i> .....	10
1.1.5 <i>Estimated chronic Dietary Exposure to Residues of Lindane</i> .....	10
<b>2. REGULATORY PROBLEM.....</b>	<b>11</b>
2.1 CURRENT REGULATIONS.....	11
<b>3. OBJECTIVES .....</b>	<b>11</b>
3.1 CONSIDERATION OF ISSUES UNDER SECTION 10 OF THE <i>FOOD STANDARDS AUSTRALIA NEW ZEALAND ACT 1991</i> .....	11
3.1.1 <i>The protection of public health and safety</i> .....	12
3.1.2 <i>The provision of adequate information relating to food to enable consumers to make informed choices</i> .....	12
3.1.3 <i>The prevention of misleading or deceptive conduct</i> .....	12
3.1.4 <i>The need for standards to be based on risk analysis using the best available scientific evidence</i> .....	12
3.1.5 <i>The promotion of consistency between domestic and international food standards</i> 12	
3.1.6 <i>The desirability of an efficient and internationally competitive food industry</i> 12	
3.1.7 <i>The promotion of fair trading in food</i> .....	12
3.1.8 <i>Any written policy guidelines formulated by the Ministerial Council</i> .....	12
<b>4. BACKGROUND .....</b>	<b>13</b>
4.1 THE USE OF AGRICULTURAL AND VETERINARY CHEMICALS .....	13
4.2 MAXIMUM RESIDUE LIMIT APPLICATIONS .....	13
4.3 MAXIMUM RESIDUE LIMITS .....	13
4.4 FOOD STANDARDS-SETTING IN AUSTRALIA AND NEW ZEALAND.....	14
4.5 TRANS TASMAN MUTUAL RECOGNITION ARRANGEMENT .....	14
4.6 LIMIT OF QUANTIFICATION .....	14
4.7 MRLS FOR PERMITS .....	15
4.8 EXTRANEOUS RESIDUE LIMIT .....	15
<b>5. EVALUATION OF PUBLIC SUBMISSIONS .....</b>	<b>15</b>
5.1 AUSTRALIAN FOOD AND GROCERY COUNCIL .....	15
5.2 THE DEPARTMENT OF AGRICULTURE FISHERIES AND FORESTRY.....	16
5.3 THE PEOPLE’S REPUBLIC OF CHINA .....	16
5.4 QUEENSLAND HEALTH.....	17
<b>6. REGULATORY OPTIONS.....</b>	<b>17</b>
6.1 OPTION 1 – STATUS QUO – NO CHANGE TO THE EXISTING MRLS IN THE CODE.....	17

6.2	OPTION 2(A) – ADOPT THE CHANGE TO MRLS TO DELETE OR DECREASE SOME EXISTING MRLS.....	17
6.3	OPTION 2(B) – ADOPT THE CHANGES TO MRLS TO INCLUDE NEW OR INCREASE SOME EXISTING MRLS.....	17
<b>7.</b>	<b>AFFECTED PARTIES.....</b>	<b>18</b>
<b>8.</b>	<b>DATA COLLECTION .....</b>	<b>18</b>
<b>9.</b>	<b>REGULATORY IMPACT ANALYSIS .....</b>	<b>18</b>
9.1	OPTION 1 – STATUS QUO – NO CHANGE TO THE EXISTING MRLS IN THE CODE. ....	18
9.1.1	<i>Benefits</i> .....	18
9.1.2	<i>Costs</i> .....	19
9.2	OPTION 2(A) – ADOPT THE CHANGES TO MRLS TO DELETE AND DECREASE SOME EXISTING MRLS.....	19
9.2.1	<i>Benefits</i> .....	19
9.2.2	<i>Costs</i> .....	19
9.3	OPTION 2(B) – ADOPT THE CHANGES TO MRLS TO INCLUDE NEW AND INCREASE SOME EXISTING MRLS.....	20
9.3.1	<i>Benefits</i> .....	20
9.3.2	<i>Costs</i> .....	20
9.4	CONCLUSION.....	21
<b>10.</b>	<b>CONSULTATION .....</b>	<b>21</b>
10.1	WORLD TRADE ORGANIZATION (WTO) .....	21
10.1.1	<i>Codex MRLs</i> .....	22
<b>11.</b>	<b>CONCLUSION .....</b>	<b>23</b>
<b>12.</b>	<b>IMPLEMENTATION AND REVIEW .....</b>	<b>23</b>
	<b>ATTACHMENT 1 - DRAFT VARIATIONS TO THE AUSTRALIA NEW ZEALAND FOOD STANDARDS CODE.....</b>	<b>25</b>
	<b>ATTACHMENT 2 - SUMMARY OF THE PROPOSED CHANGES TO MRLS FOR EACH CHEMICAL.....</b>	<b>37</b>
	<b>ATTACHMENT 3 - SUMMARY OF SUBMISSIONS RECEIVED.....</b>	<b>55</b>

## **Executive Summary and Statement of Reasons**

This Proposal (P281) seeks to amend maximum residue limits (MRLs) for a range of agricultural and veterinary chemicals as set out in Standard 1.4.2 – Maximum Residue Limits, in the *Australia New Zealand Food Standards Code* (the Code). These amendments are required in order to correct inadvertent anomalies between the Australian Pesticide and Veterinary Medicines Authority (APVMA, formerly the National Registration Authority for Agricultural and Veterinary Chemicals) MRL Standards and Standard 1.4.2.

Recently, stakeholders have brought a number of anomalies between Standard 1.4.2 and the APVMA MRL Standards to the attention of FSANZ. In response, FSANZ has initiated a comprehensive review and identified anomalies, many of which have accumulated over a number of years. Some of the anomalies are likely to have occurred prior to the formation of the then National Food Authority in 1991. The reasons for these anomalies include routine APVMA applications to amend MRLs being finalised out of sequence, some corruption of the schedules Standard 1.4.2 when Amendment 53 of the Code was gazetted and human error.

The *Agreement between the Commonwealth of Australia and the Government of New Zealand to establish a system for the development of joint food standards* (the Treaty), excluded MRLs for agricultural and veterinary chemicals in food from the joint Australia New Zealand food standards setting system. Australia and New Zealand independently and separately develop MRLs for agricultural and veterinary chemicals in food.

The proposed MRL amendments do not represent an unacceptable risk to public health and safety.

FSANZ made a Sanitary and Phytosanitary notification to the World Trade Organization. The People's Republic of China requested relevant scientific evidence on the proposed deletion of the MRL for glyphosate for edible rape seed.

### **Statement of Reasons**

- the proposed amendments correct anomalies in drafting for Standard 1.4.2 that have occurred over time;
- residues associated with the MRLs do not represent an unacceptable risk to public health and safety. The proposed amendments have previously been advised by APVMA and have undergone a thorough review of the safety data;
- APVMA has assessed appropriate toxicology, residue, animal transfer, processing and metabolism studies support the use of chemicals on commodities as outlined in this Application;
- the Office of Chemical Safety of the Therapeutic Goods Administration of the Australian Government Department of Health and Ageing (DoHA) has undertaken an appropriate toxicological assessment of the chemical products and has established relevant acceptable daily intakes (ADI), and where applicable, the acute reference doses (ARfD);

- the proposed changes will benefit all stakeholders by maintaining public health and safety while permitting the legal sale of food treated with agricultural and veterinary chemicals to control pests and diseases and improve agricultural productivity;
- FSANZ has undertaken a final regulation impact assessment process. That process concluded that the amendment to the Code is necessary, cost effective and of benefit to both producers and consumers; and
- none of FSANZ's section 10 objectives of food regulatory measures are compromised by the proposed changes.

## 1. Introduction

Chemical residues in food pose a potential risk to the community. For this reason, the residues of agricultural and veterinary chemicals in food are subject to rigorous assessment, in the public interest by the Australian Pesticide and Veterinary Medicines Authority (APVMA), (formerly the National Registration Authority for Agricultural and Veterinary Chemicals) and Food Standards Australia New Zealand (FSANZ).

FSANZ has identified anomalies in Standard 1.4.2 – Maximum Residue Limits, of the Code, and inconsistencies with the APVMA MRL Standard that have occurred over time, and raised this proposal to correct these anomalies. These anomalies were discovered following a thorough examination and comparison of all entries in Schedule 1 of Standard 1.4.2 and the APVMA MRL Standard.

### 1.1 Summary of MRLs under consideration

#### 1.1.1 Changes to MRLs

During the comparison between both MRL standards a number of anomalies were found. These include anomalies where amendments are required to increase existing MRLs or add MRLs for new foods to existing chemicals. In addition further anomalies were identified that require amendments to decrease or delete MRLs.

The MRL amendments under consideration in this Proposal are:

- the increase or addition of MRLs for certain foods, where the source of the anomaly has been identified (Table 1 of Annex 2), for the chemicals aldrin and dieldrin, chlorpyrifos, dimethoate, doramectin, ethofumesate, fenhexamid, fipronil, glyphosate, ivermectin, lindane, methidathion, permethrin, procymidone, quizalofop-ethyl, spinosad, sulphadimidine, and trichlorfon. Acceptable dietary exposure assessments have previously been undertaken for all these MRLs;
- the increase or addition of MRLs for certain foods, where the source of the anomaly has not been identified (Table 2 of Annex 2). As the reason for the anomaly could not be identified for these anomalies, it was not always clear whether a dietary exposure assessment had previously been undertaken. A new dietary exposure assessment was therefore undertaken to ensure the proposed amendments would not represent an unacceptable risk to public health and safety;

Amendments to MRLs are required for the chemicals glyphosate, methidathion, methiocarb, oxyfluorfen, propazine, pyrethrins, pyriithiobac sodium, sethoxydim, sulfosulfuron, tilmicosin, and triadimefon; and

- the reduction or deletion of MRLs for certain foods (Table 3 of Annex 2) for the chemicals bitertanol, brodifacoum, buprofezin, carbendazim, CGA279202, clomazone, cyanazine, diafenthiuron, dimethomorph, diofenolan, dithiocarbamates, emamectin, fenpiclonil, fipronil, fluquinconazole, glyphosate, halosulfuron-methyl, indoxacarb, iprodione, ivermectin, metalaxyl, methidathion, permethrin, propiconazole, pymetrozine, pyrimethanil, spinosad, tebufenozide, thiodicarb, and triclopyr.



The anomalies between Standard 1.4.2 and the APVMA MRL Standards are likely to have occurred as a result of:

- routine APVMA applications to amend MRLs being finalised out of sequence. When draft variations to amend MRLs are adopted out of sequence, it is possible that amendments from earlier Applications are not incorporated. This results in the situation where subsequent amendments can not be made because the original entry has not been incorporated. This issue has now been identified, and in order to prevent a recurrence of this situation FSANZ has undertaken to ensure APVMA applications are finalised in sequence;
- failure to lodge an application with FSANZ for some MRL amendments;
- some corruption of the schedules for the MRL standards in Standard 1.4.2 when Amendment 53 – Volume 2 of the Code, was gazetted. A number of irregularities were identified and corrected at the time, however, several more have now been identified; and
- human error by FSANZ or APVMA staff over a number of years due to the size of the standards which are constantly being amended.

In order to prevent future anomalies compounding between the APVMA MRL Standard and Standard 1.4.2, FSANZ proposes to perform an annual audit and comparison of the two standards.

#### *1.1.2 Anomalies in ‘T’ or ‘\*’*

In addition to anomalies in the MRLs, a number of other minor anomalies were discovered during the audit of the two standards. A full list of these minor anomalies is at Table 4 of Annex 2. The minor anomalies have most likely occurred over many years of amendments to Standard 1.4.2.

The minor anomalies include inconsistent nomenclature and accidental omission or inclusion of ‘T’ or ‘\*’. ‘T’ indicates a temporary MRL and ‘\*’ indicates that the MRL is at the limit of quantification (LOQ). In the case of ‘T’s and ‘\*’s the changes are large in number and are for information purposes only, having no significance in terms of dietary exposure or compliance.

The LOQ is the lowest concentration of an agricultural or veterinary chemical residue that can be identified and quantitatively measured in a specified food, agricultural commodity or animal feed with an acceptable degree of certainty by a regulatory method of analysis. The inclusion of the MRLs at the LOQ means that no detectable residues of the relevant chemical should occur. FSANZ incorporates MRLs at the LOQ in the Code to assist in identifying a practical benchmark for enforcement and to allow for future developments in methods of detection that could lead to a lowering of this limit.

#### *1.1.3 Antibiotic MRLs*

Five MRLs for antibiotic residues are considered in this Proposal, as follows:

An MRL of 0.2 mg/kg for the commodity ‘turkey (edible offal of)’ is proposed for inclusion for sulphadimidine to rectify an unintentional omission that had previously occurred in both Standard 1.4.2 and APVMA MRL Standard. Sulphadimidine is an antibacterial compound used for the control of diseases in poultry. It is administered via drinking water or feed. The amendment is required to correct an anomaly and there has been no change to the use pattern of this chemical. MRLs of 0.1 mg/kg currently exist for ‘poultry’ and ‘poultry (edible offal of) [except turkey]’.

An MRL of 0.025 mg/kg is proposed for inclusion for tilmicosin for the commodity ‘cattle milk’. This MRL is at the limit of quantification and detectable residues should not occur. The limit is proposed to be included as a benchmark for enforcement purposes.

MRLs for several commodities for lincomycin, monensin and virginiamycin are proposed to be amended to include a ‘\*’, indicating that the MRL is at the limit of quantification. The ‘\*’ is for information purposes only, and has no significance in terms of dietary exposure or compliance.

It should be noted that no submissions were received addressing antibiotic residues in food.

#### *1.1.4 ERLs and MRLs for Lindane*

In 1996, the APVMA (then known as the NRA) changed all the MRLs for lindane into extraneous residue limits (ERLs) as there was thought to be no registered uses for lindane. At the time of gazettal of Standard 1.4.2, FSANZ incorporated ERLs for lindane in Schedule 2 – Extraneous Residue Limits. However, at this time not all lindane MRLs were moved to Schedule 2, and MRLs for fruit, meat (mammalian)(in the fat) and milks (in the fat) were unintentionally retained in Schedule 1 of the MRL standard.

This anomaly was identified, and during processing of the previous anomalies under proposal (P241) these entries were deleted from Schedule 1. However, they were inadvertently not included in Schedule 2. This Proposal will now rectify the omission by incorporating the appropriate ERLs in Schedule 2 for fruit, meat (mammalian)(in the fat) and milks (in the fat).

Recently, the APVMA has advised that there is still a registered use for lindane in pineapple (P41172). Therefore, a separate entry for lindane is required in Schedule 1. In addition, a consequential amendment is required in Schedule 2, for the ERL for lindane in fruit, to specify ‘except as otherwise listed in Schedules 1 and 2’. It should be noted that the MRL for pineapple and the ERL for fruit are at the same level of 0.5 mg/kg.

Therefore, the inclusion of a specific MRL for lindane in pineapple, in effect simply transfers the existing value of 0.5 mg/kg from Schedule 2 to Schedule 1. It does not in any way affect the dietary exposure to this chemical. Rather, it reflects the current conditions of use that apply to the chemical.

#### *1.1.5 Estimated chronic Dietary Exposure to Residues of Lindane*

The 18<sup>th</sup> (1996) and 19<sup>th</sup> (1998) Australian Total Diet Surveys (ATDSs) dietary exposure estimate of lindane, as a percentage of the ADI was equivalent to <1% of ADI for the whole population and in the 20<sup>th</sup> (2000) ATDS the concentrations of residues of this chemical in surveyed foods were less than the LOQ.

The Codex Committee for Pesticide Residues is reviewing lindane and is proposing to establish ERLs at the LOQ or reduce their current ERLs for this chemical. FSANZ plans to monitor the progress of the proposed ERLs and when appropriate develop a proposal to establish lindane ERLs at the Codex limits. Lindane ERLs in the Code would then conform to internationally recognised standards.

## **2. Regulatory Problem**

### **2.1 Current Regulations**

Discrepancies currently exist between Standard 1.4.2 of the Code and the APVMA MRL Standard. These discrepancies mean that:

- where APVMA has increased MRLs, food cannot be legally sold under food legislation if it contains residues in excess of the existing MRLs in the Code;
- where APVMA has included MRLs for new chemicals or for additional foods that are not included in the Code, the particular food cannot be legally sold under food legislation if it contains any detectable residues of the particular chemical; and
- where APVMA has decreased or deleted MRLs, food may be legally sold under food legislation if it contains residues that are inconsistent with the current registered uses of chemical products.

## **3. Objectives**

The objectives of this Proposal are:

1. where necessary, to review APVMA assessment of dietary exposure, which has been conducted in accordance with an agreed APVMA/FSANZ protocol, to ensure that additions or increases in residues do not represent an unacceptable risk to public health and safety;
2. where possible, to minimise residues of agricultural and veterinary chemicals in the food supply consistent with the effective and legal control of pests and diseases; and
3. to remove discrepancies between the standards in food legislation and the legally registered uses so that legally treated food under agriculture legislation can be legally sold under food legislation.

### **3.1 Consideration of issues under section 10 of the *Food Standards Australia New Zealand Act 1991***

In developing or varying a food standard, FSANZ is required by its legislation to meet three primary objectives that are set out in section 10 of the *Food Standards Australia New Zealand Act 1991*(FSANZ Act), as follows:

### *3.1.1 The protection of public health and safety*

The Office of Chemical Safety (OCS) of the TGA establishes the acceptable daily intake (ADI) and where applicable, the acute reference dose (ARfD) for agricultural and veterinary chemicals. APVMA and FSANZ carry out estimations of dietary exposure and compare them to the ADI and, where applicable, the ARfD. On the basis of dietary exposure assessments, the residues associated with the proposed additions or increases to MRLs do not represent an unacceptable risk to public health and safety.

### *3.1.2 The provision of adequate information relating to food to enable consumers to make informed choices*

This objective is not relevant for this Proposal.

### *3.1.3 The prevention of misleading or deceptive conduct*

This objective is not relevant for this Proposal.

In addition to these main objectives, the FSANZ Act also states that FSANZ must have regard to the following:

### *3.1.4 The need for standards to be based on risk analysis using the best available scientific evidence*

The procedures used by FSANZ, the OCS and APVMA rely on the comprehensive examination of detailed scientific information, including a rigorous toxicological assessment. Dietary exposure assessments are undertaken in accordance with international protocols.

### *3.1.5 The promotion of consistency between domestic and international food standards*

This addressed in Section 9.

### *3.1.6 The desirability of an efficient and internationally competitive food industry*

The proposed MRLs are necessary to allow the legal sale of legally treated food. Varying the Code to include the proposed MRLs would promote trade and commerce.

### *3.1.7 The promotion of fair trading in food*

As the MRLs in the Code apply to all food produced or imported for sale or in Australia, the inclusion or deletion of the MRLs would affect all producers equally.

### *3.1.8 Any written policy guidelines formulated by the Ministerial Council*

To date, the Ministerial Council has not made a written notification to FSANZ of any policy guidelines that are relevant to this Proposal.

## **4. Background**

### **4.1 The use of agricultural and veterinary chemicals**

In Australia, APVMA is responsible for registering agricultural and veterinary chemical products, granting permits for use of chemical products and regulating the sale of agricultural and veterinary chemical products. Following the sale of these products, the use of the chemicals is then regulated by State and Territory 'control of use' legislation.

Before registering such a product, APVMA must be satisfied that the use of the product will not result in residues that would be an undue risk to the safety of people, including people using anything containing its residues.

When a chemical product is registered for use or a permit for use granted, APVMA includes MRLs in its APVMA MRL Standard. These MRLs are then adopted into control of use legislation in some jurisdictions and assist States and Territories in regulating the use of agricultural and veterinary chemicals.

### **4.2 Maximum Residue Limit applications**

After registering the agricultural or veterinary chemical products, based on their scientific evaluations, APVMA makes applications to FSANZ to adopt the MRLs into Standard 1.4.2 of the Code. FSANZ reviews the information provided by APVMA and validates whether the dietary exposure is within agreed safety limits. If satisfied that the residues do not represent an unacceptable risk to public health and safety and subject to adequate resolution of any issues raised during public consultation, FSANZ will then agree to adopt the proposed MRLs into Standard 1.4.2 of the Code.

FSANZ then notifies the Ministerial Council of the adoption of the variation to the Code. If the Council accepts the changes made by FSANZ, the MRLs are automatically adopted by reference under the food laws of the Australian States and Territories.

The inclusion of the MRLs in the Code has the effect of allowing legally treated produce to be legally sold, provided that the residues in the treated produce do not exceed the MRL. Changes to MRLs reflect the changing patterns of agricultural and veterinary chemicals available to farmers.

These changes include both the development of new products and crop uses, and the withdrawal of older products following review.

### **4.3 Maximum Residue Limits**

The MRL is the highest concentration of a chemical residue that is legally permitted or accepted in a food. The MRL does not indicate the amount of chemical that is always present in a treated food but it does indicate the highest residue that could possibly result from the registered conditions of use. The concentration is expressed in milligrams of the chemical per kilogram (mg/kg) of the food.

MRLs assist in indicating whether an agricultural or veterinary chemical product has been used according to its registered use. If the MRL is exceeded then this may indicate a likely misuse of the chemical product.

MRLs are also used as standards for the international trade in food. In addition, MRLs, while not direct public health limits, act to protect public health and safety by minimising residues in food consistent with the effective of control pests and diseases.

As stated above, APVMA includes MRLs in its APVMA MRL Standard when they register a chemical product for use or grant a permit for use. APVMA then notifies FSANZ of these MRLs so that FSANZ may consider them for inclusion into the Code. In relation to MRLs, FSANZ's role is to ensure that the potential residues in food do not represent an unacceptable risk to public health and safety.

FSANZ will not agree to adopt MRLs into the Code where the dietary exposure to the residues of a chemical could represent an unacceptable risk to public health and safety. In assessing this risk, FSANZ conducts dietary exposure assessments in accordance with internationally accepted practices and procedures.

In summary, the MRLs in the APVMA MRL Standard are used in some jurisdictions to assist in regulating the use of agricultural and veterinary chemical products under State and Territory 'control-of-use' legislation. Whereas the MRLs in the Code apply in relation to the sale of food under State and Territory food legislation and the inspection of imported foods by the Australian Quarantine and Inspection Service.

#### **4.4 Food Standards-setting in Australia and New Zealand**

The Treaty excluded MRLs for agricultural and veterinary chemicals in food from the joint food standards setting system. Australia and New Zealand separately and independently develop MRLs for agricultural and veterinary chemicals in food.

#### **4.5 Trans Tasman Mutual Recognition Arrangement**

Following the commencement of the Trans Tasman Mutual Recognition Arrangement (TTMRA) between Australia and New Zealand on 1 May 1998:

- food produced or imported into Australia, which complies with Standard 1.4.2 of the Code can be legally sold in New Zealand; and
- food produced or imported into New Zealand, which complies with the *New Zealand (Maximum Residue Limits of Agricultural Compounds) Mandatory Food Standard, 1999* can be legally sold in Australia.

#### **4.6 Limit of Quantification**

Some of the proposed MRLs in this Proposal are at the limit of quantification (LOQ) and are indicated by an \* in the 'Summary of Proposed Changes to MRLs for each Chemical...' (Annex 2). The LOQ is the lowest concentration of an agricultural or veterinary chemical residue that can be identified and quantitatively measured in a specified food, agricultural commodity or animal feed with an acceptable degree of certainty by a regulatory method of analysis.

The inclusion of the MRLs at the LOQ means that no detectable residues of the relevant chemical should occur. FSANZ incorporates MRLs at the LOQ in the Code to assist in identifying a practical benchmark for enforcement and to allow for future developments in methods of detection that could lead to a lowering of this limit.

#### **4.7 MRLs for Permits**

Some of the proposed MRLs in this Proposal are temporary and are indicated by a ‘T’ in the ‘Summary of the Requested MRLs for each Chemical...’ (Annex 2). These MRLs may include uses associated with:

- the minor use program;
- off-label permits for minor and emergency uses; or
- trial permits for research.

FSANZ does not issue permits or grant permission for the temporary use of agricultural and veterinary chemicals. Further information on permits for the use of agricultural and veterinary chemicals can be found on the APVMA website at [www.apvma.gov.au/](http://www.apvma.gov.au/) or by contacting APVMA on +61 2 6272 5158.

#### **4.8 Extraneous Residue Limit**

Some of the proposed residue limits in this Proposal are extraneous residue limits and are indicated by an ‘E’ in the ‘Summary of Proposed Changes to MRLs for each Chemical...’ (Annex 2). An extraneous residue limit is the maximum permitted limit of a pesticide residue, arising from environmental sources other than the use of a pesticide directly or indirectly on the food.

### **5. Evaluation of Public Submissions**

Submissions were received from:

- Australian Food and Grocery Council (AFGC);
- Australian Pork Limited;
- Department of Agriculture Fisheries and Forestry;
- Food Technology Association;
- People’s Republic of China (PRC); and
- Queensland Health

The submissions from Australian Pork Limited and the Food Technology Association of Victoria supported this Proposal.

#### **5.1 Australian Food and Grocery Council**

The AFGC identified potential problems for importers of food from the proposed deletion and reduction of MRLs.

However, AFGC did not have specific knowledge of any of the foods likely to be affected and it considered that the proposed deletions and reductions could cause some imported food to be rejected at the point of import. AFGC also noted an inconsistency in the terminology in the drafting for apple for the chemicals pyrimethanil and tebufenozide. This has been corrected.

A demonstrated need is required for the retention of an MRL, as this ensures that all MRLs in the Code are relevant and that residues are kept as low as reasonably achievable. It also ensures that MRLs in the Code have a sound scientific basis, e.g. the deletion of MRLs resulting from temporary permit for the use of the chemical of which its use has expired. While the AFGC has expressed reservations about these deletions, there is no evidence to suggest that these deletions would cause difficulties. Therefore, to maintain consistency in the Code and to keep residues as low as reasonably possible, it is important that these amendments are progressed.

Retaining MRLs proposed for deletion by APVMA would result in an inconsistency between domestic food and agricultural legislation. This would create complications for enforcement which would undermine the efficiency of domestic food production. Some inconsistency may be warranted where there is specific evidence indicating that a difference is required. However, AFGC have provided no such evidence and therefore it would be inappropriate to retain these MRLs and create an inconsistency.

## **5.2 The Department of Agriculture Fisheries and Forestry**

The Department of Agriculture Fisheries and Forestry's (DAFF's) preferred option would be to adopt the changes to MRLs to include new or increase some existing MRLs. DAFF believes that this option would allow food imported into Australia to still meet MRLs for agricultural and veterinary chemicals that can be safely used in other countries even when these same chemicals are not registered for use in Australia. DAFF's submission did not discuss the option of deleting or decreasing some existing MRLs

FSANZ's preferred approach is to adopt changes to MRLs in the Code to include new or increase some existing MRLs and to delete or decrease some existing MRLs. The reasons for this are addressed in section 8.4.

Further discussions are planned between FSANZ and DAFF on the issue of MRLs for imported foods.

## **5.3 The People's Republic of China**

In response to the sanitary phytosanitary notification for this Proposal, the People's Republic of China (PRC) requested the relevant scientific evidence on the proposed deletion of the MRL for glyphosate for rape seed, edible.

The entry for glyphosate in Schedule 1 of Standard 1.4.2 contains an entry for rape seed and one for rape seed, edible. At the time that this Proposal was initiated there was only one entry for rape seed in the APVMA MRL Standard.



This proposed deletion corrects an anomaly between the two Standards. It is not known how this anomaly had occurred, other than those reasons as stated in section 1.1.1. Therefore, as data is not available FSANZ could not fulfil the request for the ‘relevant scientific evidence’ on the proposed deletion of the MRL for glyphosate for rape seed, edible.

#### **5.4 Queensland Health**

Queensland Health supported the Proposal. However, it had concerns that the number of anomalies was significant and many may have occurred because of the existence of two MRL schedules, one in the Code and the other in the APVMA MRL Standards and their respective MRL setting processes.

The Ministerial Council has agreed to a process to harmonise the MRL setting procedures of FSANZ and APVMA. The ultimate aim is to establish one set of published MRLs that regulate safe food and safe chemical use in agriculture.

An Inter Agency Committee (IAC) comprised of FSANZ, APVMA, DoHA and DAFF, with the recent addition of State representatives, have been working cooperatively to identify options for legislative change and to develop a better MRL setting process. The IAC presented options to the most recent meeting of the Food Regulation Standing Committee (FRSC) on the harmonisation process. FRSC agreed to recommend the creation of a single unified MRL setting system shared between APVMA and FSANZ.

### **6. Regulatory Options**

#### **6.1 Option 1 – status quo – no change to the existing MRLs in the Code.**

Under this option, the status quo would be maintained and there would be no changes in the existing MRLs to the Code.

#### **6.2 Option 2(a) – adopt the change to MRLs to delete or decrease some existing MRLs.**

Under this option, only those variations that were reductions and deletions would be approved for inclusion into the Code. The proposed increases and inclusions of new MRLs would not be approved.

#### **6.3 Option 2(b) – adopt the changes to MRLs to include new or increase some existing MRLs.**

Under this option, only those variations that were increases and additions of MRLs would be approved for inclusion into the Code. The proposed decreases and deletions of MRLs would not be approved.

Option 2 has been arranged into two sub-options because the impacts of each sub-option are different even though the proposal seeks to accept all changes. Splitting the option into two sub-options also allows a more detailed impact analysis.

## **7. Affected Parties**

The parties affected by proposed MRL amendments include:

- consumers, including domestic and overseas customers;
- growers and producers of domestic and export food commodities;
- importers of agricultural produce and foods; and
- Australian Government, State and Territory agencies involved in monitoring and regulating the use of agricultural and veterinary chemicals in food and the potential resulting residues.

## **8. Data Collection**

Specific details of the proposed amendments to MRLs under consideration in this proposal are at Annex 2. For proposed amendments to add or increase MRLs for specific foods, this Annex also provides details of the reason for the anomaly, or where this has not been established, a safety assessment for each chemical.

The OCS of the TGA establishes the acceptable daily intake (ADI) and where applicable, the acute reference dose (ARfD) for agricultural and veterinary chemicals. APVMA and FSANZ carry out estimations of Dietary exposure and compare them to the ADI and, where applicable, the ARfD.

On the basis of dietary exposure assessments, the residues associated with the proposed additions or increases to MRLs in this proposal do not represent an unacceptable risk to public health and safety.

## **9. Regulatory Impact Analysis**

The impact analysis represents likely impacts based on available information. The impact analysis is designed to assist in the process of identifying the affected parties, any alternative options consistent with the objective of the proposal, and the potential impacts of any regulatory or non-regulatory provisions. The information needed to make a Final Assessment of this proposal included information from public submissions.

### **9.1 Option 1 – status quo – no change to the existing MRLs in the Code.**

#### *9.1.1 Benefits*

- for consumers the major benefit would be the maintenance of the existing confidence in the food supply in relation to residues of agricultural and veterinary chemicals;
- for growers and producers of domestic and export food commodities, the adoption of this option would not result in any discernable benefits;
- for importers, the adoption of this option would not result in any discernable benefits; and

- for Australian Government, State and Territory agencies, the adoption of this option would not result in any discernable benefits.

#### 9.1.2 *Costs*

- for consumers there are unlikely to be any discernable costs as the unavailability of some food from certain growers is likely to be seen as typical seasonal fluctuations in the food supply;
- for growers and producers of domestic and export food commodities, the adoption of this option would result in costs resulting from not being able to legally sell food containing residues consistent with increased MRLs or MRL additions. Primary producers do not produce food or use chemical products to comply with MRLs. They use chemical products to control pests and diseases in accordance with the prescribed label conditions, and expect that the resulting residues will be acceptable and that the legally treated food can be legally sold. If the legal use of chemical products results in the production of food that cannot be legally sold under food legislation then primary producers will incur substantial losses. Major losses for primary producers would in turn impact negatively upon rural and regional communities;
- for importers, the adoption of this option would not result in any discernable costs; and
- for Australian Government, State and Territory agencies, the adoption of this option would continue discrepancies between agricultural and food legislation thereby creating uncertainty, inefficiency and confusion in the enforcement of regulations.

### 9.2 **Option 2(a) – adopt the changes to MRLs to delete and decrease some existing MRLs.**

#### 9.2.1 *Benefits*

- for consumers the major benefit would be the maintenance of the existing confidence in the food supply in relation to residues of agricultural and veterinary chemicals;
- for growers and producers of domestic and export food commodities, the adoption of this option would not result in any discernable benefits;
- for importers, the adoption of this option would not result in any discernable benefits; and
- for Australian Government, State and Territory agencies, the adoption of this option would foster community confidence that regulatory authorities are maintaining the standards to minimise residues in the food supply.

#### 9.2.2 *Costs*

- for consumers there are unlikely to be any discernable costs as the unavailability of some food from certain importers is likely to be seen as typical seasonal fluctuations in the food supply;

- for growers and producers of domestic and export food commodities, the adoption of this option is unlikely to result in any costs, as reductions in MRLs are adopted where this is practically achievable, with little or no impact on production costs;
- for importers, the adoption of this option may result in costs, as foods may not be able to be imported if these foods contained residues consistent with the MRLs proposed for deletion or reduction. Any MRL deletions or reductions have the potential to restrict the importation of foods and could potentially result in higher food costs and a reduced product range available to consumers, as foods that exceed the new, lower MRLs could not be legally imported or sold to consumers. To identify any restrictions and possible trade impacts, Codex MRLs are addressed in section 9.1.1; and
- for Australian Government, State and Territory agencies, the adoption of this option would not result in any discernable costs, although there would need to be an awareness of changes in the standards for residues in food.

#### 9.2.2.1 Codex MRLS

Issues relating to Codex MRLs are addressed in section 9.1.1.

### **9.3 Option 2(b) – adopt the changes to MRLs to include new and increase some existing MRLs.**

#### *9.3.1 Benefits*

- for consumers the major benefit would be potential flow on benefits resulting from the price and availability of food if growers can legally sell food containing residues consistent with increased MRLs or MRL additions;
- for growers and producers of domestic and export food commodities, the benefits of this option would result from being able to legally sell food containing residues consistent with increased MRLs or MRL additions. Other benefits include the consistency between agricultural and food legislation thereby minimising compliance costs to primary producers;
- for importers, the adoption of this option would result in the benefit that food could be legally imported if it contained residues consistent with increased MRLs or MRL additions; and
- for Australian Government, State and Territory agencies, the benefits of this option would include the removal of discrepancies between agricultural and food legislation thereby creating certainty and allowing efficient enforcement of regulations.

#### *9.3.2 Costs*

- for consumers there are no discernable costs;
- for growers and producers of domestic and export food commodities, the adoption of this option would not result in any discernable costs;

- for importers, the adoption of this option would not result in any discernable costs; and
- for Australian Government, State and Territory agencies, the adoption of this option would not result in any discernable costs, although there may be minimal impacts associated with slight changes to residue monitoring programs.

## 9.4 Conclusion

Option 1 is a viable option but its adoption would result in:

- potential substantial costs to primary producers that may have a negative impact on their viability and in turn the viability of the rural and regional communities that depend upon the sale of the agricultural produce; and
- discrepancies between agricultural and food legislation which could have negative impacts on the compliance costs of primary producers, perception problems in export markets and undermine the efficient enforcement of standards for chemical residues.

FSANZ's preferred approach is adopt Options 2(a) and 2(b) – to adopt the change to MRLs in the Code to include new or increase some existing MRLs and to delete or decrease some existing MRLs. FSANZ prefers this approach because:

- the residues associated with the proposed MRL amendments would not result in an unacceptable risk to public health and safety (this benefit also applies to Option 1);
- the proposed changes would minimise the potential costs to primary producers and rural and regional communities in terms of legally being able to sell legally treated food;
- the proposed changes would minimise residues consistent with the effective use of agricultural and veterinary chemicals to control pests and diseases; and
- the proposed changes would remove discrepancies between agricultural and food legislation and assist enforcement.

Adopting option 2(a) may result in compliance costs for importers and industry where there are decreases or deletions of MRLs.

## 10. Consultation

### 10.1 World Trade Organization (WTO)

As members of the World Trade Organization (WTO), Australia and New Zealand are obligated to notify WTO member nations where proposed mandatory regulatory measures are inconsistent with any existing or imminent international standards and the proposed measure may have a significant effect on trade.

MRLs prescribed in the Code constitute a mandatory requirement applying to all food products of a particular class whether produced domestically or imported. Food products exceeding their relevant MRL set out in the Code cannot legally be supplied in Australia.

In administrative terms and consistent with international practice, MRLs assist in regulating the use of agricultural and veterinary chemical products. MRLs indicate whether agricultural and veterinary chemical products have been used in accordance with the registered conditions of use. MRLs, while not direct public health limits, act to protect public health and safety by minimising residues in food consistent with the effective control of pests and diseases. MRLs are also used as standards for the international trade in food.

This Proposal contains variations to MRLs that are addressed in the international Codex standard. MRLs in this Application also relate to chemicals used in the production of heavily traded agricultural commodities that may indirectly have a significant effect on trade of derivative food products between WTO members.

This Application was notified as a Sanitary and Phytosanitary (SPS) measure in accordance with the WTO SPS agreement because the primary objective of the measure is to support the regulation of the use of agricultural and veterinary chemical products to protect human, animal and plant health and the environment. No WTO member has made a submission on the trade impact of the proposed deletions of MRLs. However, the PRC requested the relevant scientific evidence on the proposed deletion of the MRL for glyphosate for rape seed, edible. Issues relating to this submission are addressed in section 5.3.

#### 10.1.1 Codex MRLs

The standards of the Codex Alimentarius Commission are used as the relevant international standard or basis as to whether a new or changed standard requires a WTO notification. The following table sets out the proposed MRL amendments, which are more restrictive than the relevant Codex MRL.

<b>Chemical Food</b>	<b>Proposed MRL mg/kg</b>	<b>Codex MRL mg/kg</b>	<b>Comments</b>
<b>Doramectin</b> Cattle fat	0.1	0.15	The difference between Codex and Australian MRLs occurs because Codex MRLs take into account the difference in good agricultural practices throughout the world. These practices may include different application rates of agricultural and veterinary chemicals and different withholding periods.
<b>Glyphosate</b> Rape seed (edible)	delete	10	While the MRL of T0.05 mg/kg for rape seed (edible) is being deleted, the MRL of T5 mg/kg for rape seed will remain in the Code.
<b>Methidathion</b> Edible offal (mammalian)	delete	*0.02	The Codex MRL applies to edible offal of cattle, pigs & sheep, however, as this MRL is at the limit of quantification, detectable residues would not be expected. Therefore the deletion of this MRL for offal from the Code is effectively the same as the Codex limit of detection MRL.

<b>Procymidone</b> Strawberry	5	10	The difference between Codex and Australian MRLs occurs because Codex MRLs take into account the difference in good agricultural practices throughout the world. These practices may include different application rates of agricultural and veterinary chemicals and different withholding periods.
----------------------------------	---	----	--

## 11. Conclusion

- The proposed amendments correct anomalies in drafting for Standard 1.4.2 that have occurred over time.
- Residues associated with the MRLs do not represent an unacceptable risk to public health and safety. The proposed amendments have previously been advised by APVMA and have undergone a thorough review of the public health and safety issues.
- APVMA has previously assessed appropriate toxicology, residue, animal transfer, processing and metabolism studies which support the use of chemicals on commodities as outlined in this Application and rejection of the MRLs would result in legally treated food not being able to be legally sold.
- The proposed changes will benefit all stakeholders by maintaining public health and safety while permitting the legal sale of food treated with agricultural and veterinary chemicals to control pests and diseases and improve agricultural productivity;
- FSANZ has undertaken a final regulation impact assessment process. That process concluded that the amendment to the Code is necessary, cost effective and of benefit to both producers and consumers; and

## 12. Implementation and review

The use of chemical products and MRLs are under constant review as part of the APVMA's Existing Chemical Review Programme. In addition, regulatory agencies involved in the regulation of chemical products continue to monitor health, agricultural and environmental issues associated with the use of chemical products. The residues in food are also monitored through:

- State and Territory residue monitoring programs;
- Australian Government programs such as the National Residue Survey; and
- dietary exposure surveys such as the Australian Total Diet Survey.

These monitoring programmes and the continual review of the use of agricultural and veterinary chemicals mean that considerable scope exists to review MRLs on a continual basis.

In addition, FSANZ proposes to undertake regular audits and comparisons of Standard 1.4.2 and APVMA MRL standards to identify any anomalies between the two standards that may inadvertently occur.

At this time it is proposed that the proposed MRL amendments should come into effect upon gazettal and continue to be monitored by the same means as other residues in food.

## **ATTACHMENTS**

1. Draft Variations to Standard 1.4.2 of the *Australia New Zealand Food Standards Code*
2. Summary of the Proposed Changes to Residue Limits for Each Chemical
3. Summary of Submissions



## ATTACHMENT 1

### DRAFT VARIATIONS TO THE AUSTRALIA NEW ZEALAND FOOD STANDARDS CODE

**To commence: On gazettal**

[1] *Standard 1.4.2 of the Australia New Zealand Food Standards Code is varied by –*

[1.1] *omitting from Schedule 1 the foods and associated MRLs for Sulphosulfuron, and substituting in alphabetical order –*

<b>SULFOSULFURON</b> SUM OF SULFOSULFURON AND ITS METABOLITES WHICH CAN BE HYDROLYSED TO 2- (ETHYLSULFONYL)IMIDAZO[1,2-A]PYRIDINE EXPRESSED AS SULFOSULFURON	
EDIBLE OFFAL (MAMMALIAN)	*0.005
EGGS	*0.005
MEAT (MAMMALIAN)	*0.005
MILKS	*0.005
POULTRY, EDIBLE OFFAL OF	*0.005
POULTRY MEAT	*0.005
TRITICALE	*0.01
WHEAT	*0.01

[1.2] *omitting from Schedule 1 the foods and associated MRLs for each of the following chemicals –*

<b>BITERTANOL</b> BITERTANOL	
POULTRY MEAT (IN THE FAT)	1
<b>BUPROFEZIN</b> BUPROFEZIN	
MEAT (MAMMALIAN)	T*0.05
<b>CARBARYL</b> CARBARYL	
DEWBERRIES (INCLUDING BOYSENBERRY, LOGANBERRY AND YOUNGBERRY)	10
<b>CARBENDAZIM</b> CARBENDAZIM	
EGG PLANT	0.02
<b>CGA279202</b> CGA279202	
BANANAS	T0.1
GRAPES	T3
POME FRUIT	T0.5

<b>CHLORPYRIFOS-METHYL</b> CHLORPYRIFOS-METHYL	
COTTON SEED OIL	*0.01
<b>CYANAZINE</b> CYANAZINE	
STONE FRUITS	T*0.05
<b>CYFLUTHRIN</b> CYFLUTHRIN, SUM OF ISOMERS	
MEAT (MAMMALIAN) (IN THE FAT)	0.02
<b>CYPERMETHRIN</b> CYPERMETHRIN, SUM OF ISOMERS	
COMMON BEAN (DRY)	0.05
<b>DELTAMETHRIN</b> DELTAMETHRIN	
POULTRY MEAT	*0.01
<b>DIAFENTHIURON</b> SUM OF DIAFENTHIURON; N-[2,6-BIS(1-METHYLETHYL)-4-PHENOXYPHENYL]-N'-(1,1-DIMETHYLETHYL)UREA; AND N-[2,6-BIS(1-METHYLETHYL)-4-PHENOXYPHENYL]-N'-(1,1-DIMETHYLETHYL)CARBODIIMIDE, EXPRESSED AS DIAFENTHIURON	
COMMON BEANS (PODS AND/OR IMMATURE SEEDS)	0.1
POTATO	0.1
TOMATO	0.5
<b>DIFLUBENZURON</b> DIFLUBENZURON	
CATTLE MEAT	*0.02
<b>DIOFENOLAN</b> DIOFENOLAN	
SHEEP, EDIBLE OFFAL OF	T0.2
SHEEP MEAT	T5
<b>FENPICLONIL</b> FENPICLONIL	
COTTONSEED	0.02

<b>FIPRONIL</b>	
SUM OF FIPRONIL, THE SULPHENYL METABOLITE (5-AMINO-1-[2,6-DICHLORO-4-(TRIFLUOROMETHYL)PHENYL]-4-[(TRIFLUOROMETHYL)SULPHENYL]-1H-PYRAZOLE-3-CARBONITRILE), THE SULPHONYL METABOLITE (5-AMINO-1-[2,6-DICHLORO-4-(TRIFLUOROMETHYL)PHENYL]-4-[(TRIFLUOROMETHYL)SULPHONYL]-1H-PYRAZOLE-3-CARBONITRILE), AND THE TRIFLUOROMETHYL METABOLITE (5-AMINO-4-TRIFLUOROMETHYL-1-[2,6-DICHLORO-4-(TRIFLUOROMETHYL)PHENYL]-1H-PYRAZOLE-3-CARBONITRILE)	
BERRIES AND OTHER SMALL FRUITS [EXCEPT STRAWBERRY AND WINE GRAPES]	T*0.01
BROCCOLI	0.03
BRUSSELS SPROUTS	0.1
CABBAGES, HEAD	0.03
CAULIFLOWER	0.03
<b>FLUQUINCONAZOLE</b>	
FLUQUINCONAZOLE	
PEAR	0.5
<b>GLYPHOSATE</b>	
GLYPHOSATE	
ADZUKI BEANS	T10
RAPE SEED, EDIBLE	T0.05
<b>HALOSULFURON-METHYL</b>	
HALOSULFURON-METHYL	
SOYA BEAN (DRY)	0.5
SOYA BEAN (IMMATURE SEEDS)	0.5
WHEAT	0.2
<b>IMIDACLOPRID</b>	
IMIDACLOPRID	
FRUITING VEGETABLES, OTHER THAN CUCURBITS	0.5
<b>INDOXACARB</b>	
INDOXACARB	
MILK (IN THE FAT)	0.5
<b>IVERMECTIN</b>	
H <sub>2</sub> B <sub>1A</sub>	
EDIBLE OFFAL (MAMMALIAN)	T*0.05
MEAT (MAMMALIAN)	T*0.05
MILKS	T*0.05
SUGAR CANE	T*0.01
<b>METALAXYL</b>	
METALAXYL	
PODDED PEA (YOUNG PODS)	T1

<b>METHIDATHION</b> METHIDATHION	
CATTLE, EDIBLE OFFAL OF	0.5
EDIBLE OFFAL (MAMMALIAN) [EXCEPT CATTLE, EDIBLE OFFAL OF]	0.05
MEAT (MAMMALIAN) [EXCEPT CATTLE MEAT (IN THE FAT)]	0.05
<b>METHOPRENE</b> METHOPRENE, SUM OF CIS- AND TRANS-ISOMERS	
MEAT (MAMMALIAN)	0.3
<b>PERMETHRIN</b> PERMETHRIN, SUM OF ISOMERS	
POULTRY, EDIBLE OFFAL OF	0.1
<b>PIPERONYL BUTOXIDE</b> PIPERONYL BUTOXIDE	
POULTRY MEAT	*0.5
<b>PROPARGITE</b> PROPARGITE	
HOPS, WET	3
<b>PYRIMETHANIL</b> PYRIMETHANIL	
APPLE	1.0
PEAR	1.0
<b>SPINOSAD</b> SUM OF SPINOSYN A AND SPINOSYN D	
PEAS (PODS AND SUCCULENT AND IMMATURE SEEDS)	T0.2
STRAWBERRY	T0.5
<b>TEBUFENOZIDE</b> TEBUFENOZIDE	
APPLES	T2
<b>THIODICARB</b> SUM OF THIODICARB, METHOMYL AND METHOMYLOXIME, EXPRESSED AS THIODICARB <i>SEE</i> ALSO METHOMYL	
POULTRY, EDIBLE OFFAL OF	*0.5
POULTRY MEAT	*0.5
RICE	*0.05
<b>TRICLOPYR</b> TRICLOPYR	
EGGS	0.05
POULTRY, EDIBLE OFFAL OF	0.05
POULTRY MEAT (IN THE FAT)	0.05
SORGHUM	0.1

[1.3] *inserting in alphabetical order in Schedule 1 the following reference –*

**FLUAZIFOP-P-BUTYL**  
SEE FLUAZIFOP-BUTYL

[1.4] inserting in Schedule 1 under the entry for the following chemical the chemical residue definition:

**CARBONYL SULPHIDE**  
CARBONYL SULPHIDE

[1.5] inserting in alphabetical order in Schedule 1, the foods and associated MRLs for each of the following chemicals –

<b>CARBARYL</b> CARBARYL	
DEWBERRIES (INCLUDING BOYSENBERRY AND LOGANBERRY)	10
<b>CHLORPYRIFOS</b> CHLORPYRIFOS	
SWEET POTATO	T0.05
<b>CHLORPYRIFOS-METHYL</b> CHLORPYRIFOS-METHYL	
COTTON SEED OIL, CRUDE	*0.01
<b>CYFLUTHRIN</b> CYFLUTHRIN, SUM OF ISOMERS	
MEAT (MAMMALIAN)	0.02
<b>CYPERMETHRIN</b> CYPERMETHRIN, SUM OF ISOMERS	
COMMON BEAN (DRY) (NAVY BEAN)	0.05
<b>DELTAMETHRIN</b> DELTAMETHRIN	
POULTRY MEAT (IN THE FAT)	*0.01
<b>DIMETHOATE</b> DIMETHOATE	
MIZUNA	T2
<b>FIPRONIL</b> SUM OF FIPRONIL, THE SULPHENYL METABOLITE (5-AMINO-1-[2,6-DICHLORO-4-(TRIFLUOROMETHYL)PHENYL]-4-[(TRIFLUOROMETHYL)SULPHENYL]-1H-PYRAZOLE-3-CARBONITRILE), THE SULPHONYL METABOLITE (5-AMINO-1-[2,6-DICHLORO-4-(TRIFLUOROMETHYL)PHENYL]-4-[(TRIFLUOROMETHYL)SULPHONYL]-1H-PYRAZOLE-3-CARBONITRILE), AND THE TRIFLUOROMETHYL METABOLITE (5-AMINO-4-TRIFLUOROMETHYL-1-[2,6-DICHLORO-4-(TRIFLUOROMETHYL)PHENYL]-1H-PYRAZOLE-3-CARBONITRILE)	
BERRIES AND OTHER SMALL FRUITS [EXCEPT WINE GRAPES]	T*0.01

CHERVIL	T0.1
<b>GLYPHOSATE</b> GLYPHOSATE	
ADZUKI BEANS (DRY)	T10
PEANUT	*0.1
<b>IMIDACLOPRID</b> SUM OF IMIDACLOPRID AND METABOLITES CONTAINING THE 6- CHLOROPYRIDINYMETHYLENEMOIEITY, EXPRESSED AS IMIDACLOPRID	
FRUITING VEGETABLES, OTHER THAN CUCURBITS [EXCEPT SWEET CORN, CORN-ON-THE COB]	0.5
<b>IVERMECTIN</b> H <sub>2</sub> B <sub>1A</sub>	
PIG, LIVER	*0.01
<b>LINDANE</b> LINDANE	
PINEAPPLE	0.5
<b>METALAXYL</b> METALAXYL	
PODDED PEA (YOUNG PODS) (SNOW AND SUGAR SNAP)	T0.1
<b>METHIOCARB</b> SUM OF METHIOCARB, ITS SULFOXIDE AND SULFONE, EXPRESSED AS METHIOCARB	
CITRUS FRUITS	0.1
<b>METHOPRENE</b> METHOPRENE, SUM OF CIS- AND TRANS-ISOMERS	
MEAT (MAMMALIAN) (IN THE FAT)	0.3
<b>OXYFLUORFEN</b> OXYFLUORFEN	
COTTON SEED	*0.05
<b>PERMETHRIN</b> PERMETHRIN, SUM OF ISOMERS	
MIZUNA	T5
<b>PIPERONYL BUTOXIDE</b> PIPERONYL BUTOXIDE	
POULTRY MEAT (IN THE FAT)	*0.5
<b>PROPARGITE</b> PROPARGITE	
HOPS, DRY	3
<b>PROPAZINE</b> PROPAZINE	
LUPIN	*0.1

<b>PYRETHRINS</b>	
SUM OF PYRETHRINS I AND II, CINERINS I AND II AND JASMOLINS I AND II , DETERMINED AFTER CALIBRATION BY MEANS OF THE INTERNATIONAL PYRETHRUM STANDARD	
PUMPKINS	T0.02
<b>SPINOSAD</b>	
SUM OF SPINOSYN A AND SPINOSYN D	
PEAS	T0.2
<b>SULPHADIMIDINE</b>	
SULPHADIMIDINE	
TURKEY, EDIBLE OFFAL OF	0.2
<b>TILMICOSIN</b>	
TILMICOSIN	
CATTLE MILK	T*0.025
<b>TRIADIMEFON</b>	
SUM OF TRIADIMEFON AND TRIADIMENOL, EXPRESSED AS TRIADIMEFON <i>SEE ALSO</i> TRIADIMENOL	
MUNG BEAN (DRY)	T0.1

[1.6] omitting from Schedule 1, under the entries for the following chemicals, the maximum residue limit for the food, substituting –

<b>ABAMECTIN</b>	
SUM OF AVERMECTIN B 1A, AVERMECTIN B 1B AND D-8,9 ISOMER OF AVERMECTIN B 1A	
PEPPERS	0.02
<b>ACIFLUORFEN</b>	
ACIFLUORFEN	
EDIBLE OFFAL (MAMMALIAN)	0.1
EGGS	*0.01
<b>ALDICARB</b>	
SUM OF ALDICARB, ITS SULFOXIDE AND ITS SULFONE, EXPRESSED AS ALDICARB	
SUGAR CANE	*0.02
<b>ASULAM</b>	
ASULAM	
POTATO	0.4
<b>AZINPHOS-METHYL</b>	
AZINPHOS-METHYL	
EDIBLE OFFAL (MAMMALIAN)	*0.05
<b>BIFENTHRIN</b>	
BIFENTHRIN	
EGG PLANT	T0.5

<b>BRODIFACOUM</b> BRODIFACOUM	
CEREAL GRAINS	T*0.00002
EDIBLE OFFAL (MAMMALIAN)	T*0.00005
MEAT (MAMMALIAN)	T*0.00005
PULSES	T*0.00002
<b>BUPROFEZIN</b> BUPROFEZIN	
CITRUS FRUITS	2
EDIBLE OFFAL (MAMMALIAN)	*0.05
MILKS	*0.01
<b>BUTROXYDIM</b> BUTROXYDIM	
EDIBLE OFFAL (MAMMALIAN)	*0.01
EGGS	*0.01
LEGUME VEGETABLES	*0.01
MEAT (MAMMALIAN)	*0.01
MILKS	*0.01
OILSEED	*0.01
POULTRY, EDIBLE OFFAL OF	*0.01
POULTRY MEAT	*0.01
PULSES	*0.01
<b>CARBENDAZIM</b> SUM OF CARBENDAZIM AND 2- AMINOBENZIMIDAZOLE, EXPRESSED AS CARBENDAZIM	
VEGETABLES [EXCEPT AS OTHERWISE LISTED UNDER THIS CHEMICAL]	3
<b>CHLORPYRIFOS</b> CHLORPYRIFOS	
KIWIFRUIT	2
<b>CLOMAZONE</b> CLOMAZONE	
BEANS [EXCEPT BROAD BEANS AND SOYA BEANS]	*0.05
<b>DIMETHOATE</b> SUM OF DIMETHOATE AND OMETHOATE, EXPRESSED AS DIMETHOATE <i>SEE ALSO OMETHOATE</i>	
QUANDONG	T5
<b>DIMETHOMORPH</b> SUM OF E AND Z ISOMERS OF DIMETHOMORPH	
POPPY SEED	*0.02
<b>DITHIOCARBAMATES</b> AS CARBON DISULPHIDE EVOLVED DURING ACID DIGESTION AND EXPRESSED AS MILLIGRAMS OF CARBON DISULPHIDE PER KILOGRAM OF FOOD	
COTTON SEED	T10
EGGS	*0.5



PAPAYA (PAWPAW)	5
<b>DORAMECTIN</b> DORAMECTIN	
CATTLE, EDIBLE OFFAL OF	0.1
CATTLE FAT	0.1
<b>EMAMECTIN</b> AS CARBON DISULPHIDE EVOLVED DURING ACID DIGESTION AND EXPRESSED AS MILLIGRAMS OF CARBON DISULPHIDE PER KILOGRAM OF FOOD	
MILKS	*0.0005
<b>ETHOFUMESATE</b> ETHOFUMESATE	
MEAT (MAMMALIAN) (IN THE FAT)	0.5
MILKS (IN THE FAT)	0.2
<b>ETHOPROPHOS</b> ETHOPROPHOS	
POTATO	*0.02
<b>FENHEXAMID</b> FENHEXAMID	
STRAWBERRY	10
<b>FIPRONIL</b> SUM OF FIPRONIL, THE SULPHENYL METABOLITE (5- AMINO-1-[2,6-DICHLORO-4- (TRIFLUOROMETHYL)PHENYL]-4- [(TRIFLUOROMETHYL)SULPHENYL]-1H-PYRAZOLE- 3-CARBONITRILE), THE SULPHONYL METABOLITE (5-AMINO-1-[2,6- DICHLORO-4-(TRIFLUOROMETHYL)PHENYL]-4- [(TRIFLUOROMETHYL)SULPHONYL]-1H-PYRAZOLE- 3-CARBONITRILE), AND THE TRIFLUOROMETHYL METABOLITE (5-AMINO-4-TRIFLUOROMETHYL-1- [2,6-DICHLORO-4-(TRIFLUOROMETHYL)PHENYL]-1H- PYRAZOLE-3-CARBONITRILE)	
COTTON SEED	*0.01
COTTON SEED OIL, CRUDE	*0.01
MUSHROOMS	0.02
SORGHUM	0.01
SUGAR CANE	*0.01
<b>FLUAZIFOP-BUTYL</b> FLUAZIFOP-BUTYL	
CITRUS FRUITS	*0.02
<b>FLUAZINAM</b> FLUAZINAM	
BRASSICA (COLE OR CABBAGE) VEGETABLES	*0.01
<b>FLUPROPANATE</b> FLUPROPANATE	
EDIBLE OFFAL (MAMMALIAN)	*0.1
MEAT (MAMMALIAN) (IN THE FAT)	*0.1

<b>GLYPHOSATE</b> GLYPHOSATE	
SUGAR CANE	T0.3
<b>IPRODIONE</b> IPRODIONE	
MACADAMIA NUTS	*0.01
TURMERIC ROOT	T5
<b>LINCOMYCIN</b> INHIBITORY SUBSTANCE, IDENTIFIED AS LINCOMYCIN	
CATTLE MILK	*0.02
<b>LUFENURON</b> LUFENURON	
COTTON SEED	T0.2
<b>METALDEHYDE</b> METALDEHYDE	
TURMERIC ROOT	T1
VEGETABLES	1
<b>METHABENZTHIAZURON</b> METHABENZTHIAZURON	
CEREAL GRAINS	*0.05
GRAPES	*0.1
ONION, BULB	*0.05
<b>METHIDATHION</b> METHIDATHION	
COFFEE BEANS	T1
MEAT (MAMMALIAN) (IN THE FAT)	0.5
<b>METHOMYL</b> SUM OF METHOMYL AND METHYL HYDROXYTHIOACETIMIDATE ('METHOMYL OXIME'), EXPRESSED AS METHOMYL <i>SEE ALSO</i> THIODICARB	
TURMERIC, ROOT	T*0.02
<b>METHYL BROMIDE</b> METHYL BROMIDE	
FRUIT [EXCEPT JACKFRUIT; LITCHI; MANGO; PAPAYA]	T*0.05
VEGETABLES [EXCEPT CUCUMBER AND PEPPERS]	T*0.05
<b>MONENSIN</b> MONENSIN	
POULTRY, EDIBLE OFFAL OF	*0.5
POULTRY MEAT (IN THE FAT)	*0.5
<b>OXYFLUORFEN</b> OXYFLUORFEN	
EDIBLE OFFAL (MAMMALIAN)	*0.01
<b>PARATHION-METHYL</b> PARATHION-METHYL	
MEAT (MAMMALIAN)	T*0.05

MILKS	T*0.05
<b>PROCYMIDONE</b> PROCYMIDONE	
STRAWBERRY	5
<b>PROPACHLOR</b> PROPACHLOR	
BRASSICA (COLE OR CABBAGE) VEGETABLES, HEAD CABBAGES, FLOWERHEAD BRASSICAS	0.6
<b>PROPICONAZOLE</b> PROPICONAZOLE	
MINT OIL	*0.02
<b>PYMETROZINE</b> PYMETROZINE	
BRASSICA (COLE OR CABBAGE) VEGETABLES, HEAD CABBAGES, FLOWERHEAD BRASSICAS	*0.02
<b>PYRIMETHANIL</b> PYRIMETHANIL	
POTATO	*0.01
TOMATO	1
<b>PYRITHIOBAC SODIUM</b> PYRITHIOBAC SODIUM	
COTTON SEED	*0.02
<b>QUIZALOFOP-ETHYL</b> SUM OF QUIZALOFOP-ETHYL AND QUIZALOFOP ID ACID AND OTHER ESTERS, EXPRESSED AS QUIZALOFOP-ETHYL	
PULSES	0.2
<b>SETHOXYDIM</b> SUM OF SETHOXYDIM AND METABOLITES CONTAINING THE 5-(2- ETHYLTHIOPROPYL)CYCLOHEXENE-3-ONE AND 5-HYDROXYCYCLOHEXENE-3-ONE MOIETIES AND THEIR SULFOXIDES AND SULFOXIDES AND SULFONES, EXPRESSED AS SETHOXYDIM	
BRASSICA (COLE OR CABBAGE) VEGETABLES, HEAD CABBAGES, FLOWERHEAD BRASSICAS	0.2
<b>SIMAZINE</b> SIMAZINE	
RAPE SEED	*0.02
TREE NUTS	*0.1
<b>SPINOSAD</b> SUM OF SPINOSYN A AND SPINOSYN D	
GRAPES	0.5
POME FRUITS	0.2

<b>SULPHADOXINE</b> SULPHADOXINE	
CATTLE MILK	*0.1
EDIBLE OFFAL (MAMMALIAN)	*0.1
MEAT (MAMMALIAN)	*0.1
<b>TEBUCONAZOLE</b> TEBUCONAZOLE	
BROAD BEAN (DRY)	T0.5
<b>TRICHLORFON</b> TRICHLORFON	
PEPPERS	T0.5

[1.7] *inserting in alphabetical order in Schedule 2 the foods and ERLs for the following chemicals –*

<b>LINDANE</b> LINDANE	
FRUITS [EXCEPT AS OTHERWISE LISTED IN SCHEDULES 1 AND 2]	E0.5
MEAT (MAMMALIAN) (IN THE FAT)	E2
MILKS (IN THE FAT)	E0.2

[1.8] *omitting from Schedule 2 the food and ERL for the following chemicals, substituting –*

<b>ALDRIN AND DIELDRIN</b> SUM OF HHDN AND HEOD	
MILKS, IN THE FAT	E0.15
SUGAR CANE	E*0.01

[1.9] *inserting in alphabetical order in Schedule 4 in the Commodities listed under the heading **Herbs***

Mizuna

## ATTACHMENT 2

### SUMMARY OF THE PROPOSED CHANGES TO MRLS FOR EACH CHEMICAL

#### NOTES ON TERMS USED IN THE TABLES

ADI – Acceptable Daily Intake - The ADI is the daily intake of an agricultural or veterinary chemical, which, during the consumer's entire lifetime, appears to be without appreciable risk to the health of the consumer. This is based on all the known facts at the time of the evaluation of the chemical. The ADI is expressed in milligrams of the chemical per kilogram of body weight.

ARfD – Acute Reference Dose - The ARfD is the estimate of the amount of a substance in food, expressed on a body weight basis, that can be ingested over a short period of time, usually during one meal or one day, without appreciable health risk to the consumer, on the basis of all the known facts at the time of evaluation.

LOQ - Limit of Quantification - The LOQ is the lowest concentration of a pesticide residue that can be identified and quantitatively measured in a specified food, agricultural commodity or animal feed with an acceptable degree of certainty by a regulatory method of analysis.

NEDI - National Estimated Dietary Intake - The NEDI represents a more realistic estimate of dietary exposure and is the preferred calculation. It may incorporate more refined food consumption data including that for specific sub-groups of the population. The NEDI calculation may take into account such factors as the proportion of the crop or commodity treated; residues in edible portions; the effects of processing and cooking on residue levels; and may use median residue levels from supervised trials other than the MRL to represent pesticide residue levels. In most cases the NEDI is still an overestimation because the above data is often not available and in these cases the MRL is used.

NESTI - National Estimated Short Term Intake - The NESTI is used to estimate acute dietary exposure. Acute (short term) dietary exposure assessments are undertaken when an ARfD has been determined for a chemical. Acute dietary exposures are normally only estimated based on consumption of raw unprocessed commodities (fruit and vegetables) but may include consideration of meat, offal, cereal, milk or dairy product consumption on a case-by-case basis. FSANZ has used ARfDs set by the TGA and Joint FAO/WHO Meeting on Pesticide Residues, the consumption data from the 1995 National Nutrition Survey (NNS) and the MRL when the STMR is not available to calculate the NESTIs.

The NESTI calculation incorporates the large portion (97.5 percentile) food consumption data and can take into account such factors as the highest residue on a composite sample of an edible portion; the supervised trials median residue (STMR), representing typical residue in an edible portion resulting from the maximum permitted pesticide use pattern; processing factors which affect changes from the raw commodity to the consumed food and the variability factor.

**The following are examples of entries and the proposed MRLs listed are not part of this Application.**

<p><b>Fipronil</b> Berries and other small fruits [except grapes and strawberry]</p> <p>Berries and other small fruits [except wine grapes]</p> <p>Strawberry</p>	<p>Delete</p> <p>Add</p> <p>Delete</p>	<p>T*0.01</p> <p>T*0.01</p> <p>T0.5</p>	<p>This chemical is a phenylpyrazole. The APVMA has extended the trial permit for this chemical to control Western Flower Thrip in strawberry. An MRL for fipronil on strawberry is required to accommodate the use as a bait for fruit fly. This use is not expected to result in residues and so the MRL is proposed at the LOQ.</p> <p>NESTI = &lt;1% of ARfD for berries NEDI = 60% of ADI</p>
---	--	---	--

Name of the Chemical (in bold)

Food for which the proposed MRL is to apply.

Whether the proposed MRL is being added or deleted.

The 'T' means the MRL is temporary and under review.

The '\*' means that the MRL is at the limit of quantification and detectable residues should not occur.

Class of Chemical.

The NESTI is an assessment of the acute exposure which is compared to the acute reference dose (ARfD). More information is in the glossary on the NESTI and the ARfD. To be acceptable to FSANZ, the NESTI must be less than 100% of the ARfD because the ARfD is considered the 'safe' level.

Acute Reference Dose (ARfD) more information on this term is in the glossary

The NEDI is an assessment of the chronic exposure which is compared to the acceptable daily intake (ADI). More information is in the glossary on the NEDI and the ADI. To be acceptable to FSANZ, the NEDI must be less than 100% of the ADI because the ADI is considered the 'safe' level.

Acceptable Daily Intake (ADI) more information on this term is in the glossary

Information about the use of the chemical is provided so consumers can see the reason why the residues may occur in food.

Data from the Australian Total Diet Survey (ATDS) is provided when available because it provides an indication of the typical exposure to chemicals in table ready foods. The ATDS results are more realistic because the NEDI and NESTI calculations are theoretical calculations that conservatively overestimate exposure.

<p><b>Chlorpyrifos</b> Coffee beans</p>	<p>Add</p>	<p>T0.5</p>	<p>APVMA extension of use for the control of pests. The 18<sup>th</sup> ATDS (1996) dietary exposure estimate for chlorpyrifos, as a percentage of the ADI is equivalent to 0.53% of ADI for adult males and up to 1.42% for 2 year olds. The 19<sup>th</sup> ATDS (1998) dietary exposure estimate for chlorpyrifos, as a percentage of the ADI is equivalent to 0.51% of ADI for adult males and up to 2.55% of ADI for 2 year olds. NEDI = 83% of ADI</p>
---	------------	-------------	--

Small variations may be noted in the exposure assessment between different ATDSs. These variations are minor and typically result because of the different range of foods in the individual surveys.

**Table 1: Additions or Increases in MRLs, where a reason for the anomaly has been identified.**

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Aldrin and Dieldrin</b> Milks (in the fat)	Delete E0.1 Substitute E0.15	An error was made when Standard 1.4.2 was originally gazetted. The existing MRL at that time in Standard A14 for aldrin and dieldrin in milks (in the fat) was 0.15 mg/kg but this was incorrectly transposed as 0.1 mg/kg into Standard 1.4.2. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Chlorpyrifos</b> Sweet potato	Add T0.05	As part of Application A398, an MRL of 0.05 mg/kg was included for this chemical in sweet potato. However, as part of P241, the MRL of 0.05 mg/kg was inadvertently deleted when an MRL of T0.05 mg/kg should have been substituted. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Dimethoate</b> Mizuna	Add T2	<b>Add mizuna to Schedule 4 of Standard 1.4.2, under 'Herbs'.</b>  Previously Schedule 4 of the Code listed mizuna as an herb. However, mizuna appears to have been inadvertently omitted from the list of herbs in Schedule 4.  MRLs of T2 mg/kg for chervil, herbs and rucola, were recommended for inclusion during P241. However, as mizuna is the subject of specific conditions of use separate to herbs, it requires its own specific entry. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.



<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Doramectin</b> Cattle, edible offal of  Cattle fat	Delete 0.01 Substitute 0.1  Delete 0.01 Substitute 0.1	An error was made when Standard 1.4.2 was originally gazetted. The MRL entries of for both 'Cattle, edible offal of', and 'Cattle fat' were incorrectly listed with MRLs of 0.01 mg/kg when they were both listed at 0.1 mg/kg. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Ethofumesate</b> Meat (mammalian) (in the fat)  Milks (in the fat)	Delete T*0.05 Substitute 0.5  Delete T*0.05 Substitute 0.2	An error was made in the gazettal of Standard 1.4.2. Both Meat (mammalian) (in the fat) and Milks (in the fat) were incorrectly included with MRLs of T*0.05 mg/kg when they should have been 0.5 and 0.2 mg/kg respectively. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Fenhexamid</b> Strawberry	Delete T5 Substitute 10	An MRL of 10 mg/kg for strawberries was considered and recommended as part of Application A450. However, this change was inadvertently omitted at gazettal. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Fipronil</b> Chervil	Add T0.1	This MRL was considered and recommended as part of Application A451. However this change was inadvertently omitted at gazettal. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Glyphosate</b> Sugar cane	Delete 0.05 Substitute T0.3	The MRL of T0.3 mg/kg for sugar cane was assessed as part of Application A414. However, this change could not be gazetted as the existing MRL was incorrectly listed. As a result the drafting instructions could not be administratively implemented and the change was not made. As this MRL change has previously been assessed and agreed, a dietary exposure assessment has not been recalculated.

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Ivermectin</b> Pig, liver	Add *0.01	An error was made in the original gazettal of Standard 1.4.2, where the MRL of 0.01 mg/kg for pig liver was inadvertently omitted. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Lindane</b> Fruits (except as otherwise listed in Schedules 1 and 2) Meat (mammalian) (in the fat) Milks (in the fat)	Add E0.5 Add E2 Add E0.2	During Proposal P241 these entries were deleted from Schedule 1 and inadvertently were not included in Schedule 2 (Extraneous) MRLs. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Lindane</b> Pineapple	Add 0.5	In 1996 the APVMA changed all the MRLs for lindane into ERLs as there was thought to be no registered uses for lindane. However, the APVMA has advised that lindane is registered for use on pineapple and, therefore, a separate entry for lindane is required to be included in Schedule 1 of Standard 1.4.2. As the MRL is at the same level as for other fruits, the dietary exposure is unchanged and an assessment has not been recalculated. In the 20 <sup>th</sup> (2000) ATDS the concentrations of residues of lindane in surveyed foods were less than the LOQ.
<b>Methidathion</b> Meat (mammalian) (in the fat)	Delete 0.05 Substitute 0.5	The MRL of 0.5 mg/kg for meat (mammalian)(in the fat) was considered and recommended as part of Application A447, along with a change in the commodity name from 'meat (mammalian) [except cattle meat (in the fat)]'. An error occurred in implementing the drafting and the change in MRL was omitted. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Permethrin</b> Mizuna	Add T5	Previously Schedule 4 of the Code listed mizuna as an herb. However, mizuna appears to have been inadvertently omitted from the list of herbs in Schedule 4. An MRL of T5 mg/kg for herbs was recommended for inclusion during P241.  However, as mizuna is the subject of specific conditions of use it requires its own specific entry. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Procymidone</b> Strawberry	Delete Substitute 2 5	The MRL for procymidone in strawberry was originally at 5 mg/kg. However, following Amendment 62 (17 September 2002) to Standard 1.4.2, the MRL for strawberries was incorrectly changed to 2 mg/kg. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Quinalofop-ethyl</b> Pulses	Delete Substitute 0.1 0.2	This MRL was considered and recommended as part of Application A450 but was inadvertently omitted from the drafting. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.
<b>Spinosad</b> Grapes  Pome fruits	Delete Substitute Delete Substitute T0.1 0.5 T0.1 0.2	These MRLs were considered and recommended as part of Application A450 but was inadvertently omitted from the drafting. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Sulphadimidine</b> Turkey, edible offal of	Add 0.2	<p>During Proposal P241, the MRLs for sulphadimidine were amended by changing the MRL for sulphadimidine from ‘poultry, edible offal of’ to ‘poultry edible offal of [except turkey]’ to reflect the existing MRLs in the APVMA MRL Standard. At that time, the MRL for ‘Turkey, edible offal of’ did not exist in the APVMA MRL Standard. Therefore, although the general edible offal entry was amended, a specific entry for turkey edible offal was not included.</p> <p>Subsequently, in January 2001, the APVMA corrected the oversight in its MRL standard, and included an MRL for ‘turkey, edible offal of’. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.</p>
<b>Trichlorfon</b> Peppers	Delete Substitute T0.05 T0.5	<p>The MRL of T0.5 mg/kg was considered and recommended as part of Application A409. However, the drafting was incorrectly listed an MRL of T0.05 mg/kg. As this change is proposed to address an administrative error, a dietary exposure assessment has not been recalculated.</p>

**Table 2: Additions or Increases to MRLs where a reason for the anomaly could not be identified.**

These changes are proposed to ensure consistency between the APVMA MRL Standard and Standard 1.4.2 of the *Australia New Zealand Food Standards Code*.

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Glyphosate</b> Peanut	Add *0.1	Data for glyphosate was reviewed by FSANZ in June 2003 in association with A497. At that time a MRL for peanuts of *0.1 mg/kg was included in the NEDI calculations. NEDI = 4.2% of the ADI.
<b>Methidathion</b> Coffee beans	Delete T0.1 Substitute T1	Data for methidathion was reviewed by FSANZ in September 2002 in association with A468. NEDI = 62.3% of the ADI.
<b>Methiocarb</b> Citrus fruits	Add 0.1	A MRL for fruits of T0.1 mg/kg already exists for this chemical. As the residue level permitted is unchanged, a dietary exposure assessment is unnecessary.
<b>Oxyfluorfen</b> Cotton seed	Add *0.05	Safety data for oxyfluorfen was reviewed by FSANZ in June 2003 in association with A497. At that time a MRL of *0.1 mg/kg for cotton seed was already included in the NEDI calculations. NEDI=1.6% of the ADI.
<b>Propazine</b> Lupin	Add *0.1	A MRL for vegetables of *0.1 mg/kg already exists for this chemical. As the residue level permitted is unchanged, a dietary exposure assessment is unnecessary.
<b>Pyrethrins</b> Pumpkins	Add T0.02	A MRL for vegetables of 1 mg/kg already exists for this chemical. As the residue level permitted is unchanged, a dietary exposure assessment is unnecessary. Inclusion of the MRL for pumpkins in reality represents a reduction in the MRL.
<b>Pyriithiobac sodium</b> Cotton seed	Delete *0.01 Substitute *0.02	The NEDI for this chemical is calculated to be less than 1% of the ADI.

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Sethoxydim</b> Brassica (cole or cabbage) vegetables, Head cabbages, Flowerhead brassicas	Delete *0.1 Substitute 0.2	Data for sethoxydim was reviewed by FSANZ in October 2001 in association with A451. NEDI = 25% of the ADI.
<b>Sulphosulfuron</b> Wheat	Delete 0.005 Substitute *0.01	Data for sulphosulfuron was reviewed by FSANZ in October 2000 in association with A420. At that time MRLs of *0.01 mg/kg for cereal grains and cereal grain fractions were included in the NEDI calculations. NEDI = 0.04% of the ADI.
<b>Tilmicosin</b> Cattle milk	Add T*0.025	This MRL is at the limit of quantification and detectable residues should not occur. The limit is proposed to be included as a benchmark for enforcement purposes. NEDI = 14.8% of the ADI
<b>Triadimefon</b> Mung bean (dry)	Add T0.1	The NEDI for this chemical is calculated to be 4% of the ADI.

**Table 3: Deletions or Decreases in MRLs**

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Bitertanol</b> Poultry meat (in the fat)	Delete 1	
<b>Brodifacoum</b> Cereal Grains	Delete T*0.0002 Substitute T*0.00002	
Edible offal (mammalian)	Delete T*0.0005 Substitute T*0.00005	
Meat (mammalian)	Delete T*0.0005 Substitute T*0.00005	
Pulses	Delete T*0.0002 Substitute T*0.00002	“P” in upper case.
<b>Buprofezin</b> Citrus fruits	Delete T3 Substitute 2	
Meat (mammalian)	Delete T*0.05	
<b>Carbendazim</b> Egg plant	Delete 0.02	

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>CGA279202</b> Bananas Grapes Pome fruit	Delete T0.1 Delete T3 Delete T0.5	Considered in anomaly amendment P261. Drafting inadvertently included rather than deleted the chemical and foods. Chemical has been renamed as Trifloxystrobin.
<b>Clomazone</b> Beans [except broad beans and soya beans]	Delete *0.5 Substitute *0.05	
<b>Cyanazine</b> Stone fruits	Delete T*0.05	
<b>Diafenthiuron</b> Common beans (pods and/or immature seeds) Potato Tomato	Delete 0.1 Delete 0.1 Delete 0.5	
<b>Dimethomorph</b> Poppy seed	Delete *0.2 Substitute *0.02	
<b>Diofenolan</b> Sheep, edible offal of Sheep meat	Delete T0.2 Delete T5	
<b>Dithiocarbamates</b> Papaya (pawpaw)	Delete T30 Substitute 5	
<b>Emamectin</b> Milks	Delete *0.005 Substitute *0.0005	
<b>Fenpiclonil</b> Cottonseed	Delete 0.02	
<b>Fipronil</b> Broccoli Brussels sprouts Cabbages, head Cauliflower Cotton seed  Cotton seed oil, crude  Mushrooms	Delete 0.03 Delete 0.1 Delete 0.03 Delete 0.03 Delete *0.1 Substitute *0.01  Delete *0.05 Substitute *0.01  Delete 0.05 Substitute 0.02	
<b>Fluquinconazole</b> Pear	Delete 0.5	
<b>Glyphosate</b> Rape seed, edible	Delete T0.05	
<b>Halosulfuron-methyl</b> Soya bean (dry) Soya bean (immature seeds) Wheat	Delete 0.5 Delete 0.5 Delete 0.2	

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Indoxacarb</b> Milk (in the fat)	Delete 0.5	
<b>Iprodione</b> Macadamia nuts	Delete *0.2 Substitute *0.01	
<b>Ivermectin</b> Edible Offal (mammalian) Meat (mammalian) Milks Sugar cane	Delete T*0.05 Delete T*0.05 Delete T*0.05 Delete T*0.01	
<b>Metalaxyl</b> Podded pea (young pods) Podded pea (young pods) (snow and sugar snap)	Delete T1 Add T0.1	
<b>Methidathion</b> Cattle, edible offal of Edible offal (mammalian) [except cattle, edible offal of] Meat (mammalian) [except cattle meat (in the fat)]	Delete 0.5 Delete 0.05 Delete 0.05	
<b>Permethrin</b> Poultry, edible offal of	Delete 0.1	
<b>Propiconazole</b> Mint oil	Delete *0.2 Substitute *0.02	
<b>Pymetrozine</b> brassica (cole or cabbage) vegetables, head cabbages, flowerhead cabbages	Delete *0.1 Substitute *0.02	Also upper case initial letters for Brassica, Head and Flowerhead. Should be "Flowerhead brassicas"
<b>Pyrimethanil</b> Apple Pear Tomato	Delete 1.0 Delete 1.0 Delete 2 Substitute 1	
<b>Spinosad</b> Strawberry	Delete T0.5	
<b>Tebufozide</b> Apples	Delete T2	
<b>Thiodicarb</b> Poultry, edible offal of Poultry meat Rice	Delete *0.5 Delete *0.5 Delete *0.05	
<b>Triclopyr</b> Eggs Poultry, edible offal of Poultry meat (in the fat) Sorghum	Delete 0.05 Delete 0.05 Delete 0.05 Delete 0.1	



**Table 4: Accidental omission or inclusion of ‘T’ or ‘\*’, anomalies in commodity names and chemical definitions.**

‘T’ indicates a temporary MRL and ‘\*’ indicates that the MRL is at the limit of quantification. In the case of ‘T’s and ‘\*’s the changes are many in number and are for information purposes only and have no significance in terms of dietary exposure or compliance.

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Abamectin</b> Peppers	Delete T0.02 Substitute 0.02	
<b>Acifluorfen</b> Edible offal (mammalian)	Delete *0.1 Substitute 0.1	
Eggs	Delete 0.01 Substitute *0.01	
<b>Aldicarb</b> Sugar cane	Delete 0.02 Substitute *0.02	
<b>Aldrin and Dieldrin</b> Sugar cane	Delete E0.01 Substitute E*0.01	
<b>Asulam</b> Potato	Delete *0.4 Substitute 0.4	
<b>Azinphos-methyl</b> Edible offal (mammalian)	Delete 0.05 Substitute *0.05	
<b>Bifenthrin</b> Egg plant	Delete 0.5 Substitute T0.5	
<b>Buprofezin</b> Edible offal (mammalian)	Delete T*0.05 Substitute *0.05	
Milks	Delete T*0.01 Substitute *0.01	

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Butroxydim</b> Edible offal (mammalian)	Delete 0.01 Substitute *0.01	
Eggs	Delete 0.01 Substitute *0.01	
Legume Vegetables	Delete 0.01 Substitute *0.01	
Meat (mammalian)	Delete 0.01 Substitute *0.01	
Milks	Delete 0.01 Substitute *0.01	
Oilseed	Delete 0.01 Substitute *0.01	
Poultry, edible offal of	Delete 0.01 Substitute *0.01	
Poultry meat	Delete 0.01 Substitute *0.01	
Pulses	Delete 0.01 Substitute *0.01	
<b>Carbaryl</b> Dewberries (including boysenberry, loganberry and youngberry)	Delete 10	
Dewberries (including Boysenberry and Loganberry)	Add 10	
<b>Carbendazim</b> Vegetables [except as otherwise listed under this chemical]	Delete T3 Substitute 3	
<b>Carbonyl sulphide</b>		Add residue definition “ <b>Carbonyl sulphide</b> ”
<b>Chlorpyrifos</b> Kiwifruit	Delete T2 Substitute 2	
<b>Chlorpyrifos-methyl</b> Cotton seed oil Cotton seed oil, crude	Delete *0.01 Add *0.01	
<b>Cyfluthrin</b> Meat (mammalian)(in the fat) Meat (mammalian)	Delete 0.02 Add 0.02	

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Cypermethrin</b> Common bean (dry) Common bean (dry) (navy bean)	Delete 0.05 Add 0.05	
<b>Deltamethrin</b> Poultry meat Poultry meat (in the fat)	Delete *0.01 Add *0.01	
<b>Diflubenzuron</b> Cattle meat Cattle meat (in the fat)	Delete *0.02 Add *0.02	
<b>Dimethoate</b> Quandong	Delete 5 Substitute T5	
<b>Dithiocarbamates</b> Cotton seed  Eggs	Delete 10 Substitute T10  Delete 0.5 Substitute *0.5	
<b>Ethoprophos</b> Potato	Delete T0.02 Substitute *0.02	
<b>Fipronil</b> Berries and other small fruits [except strawberry and wine grapes] Berries and other small fruits [except wine-grapes] Sorghum  Sugar cane	Delete T*0.01 Add T*0.01 Delete *0.01 Substitute 0.01  Delete T0.01 Substitute *0.01	
<b>Fluazifop-butyl</b> Citrus fruits	Delete 0.02 Substitute *0.02	
<b>Fluazifop-p-butyl</b>		Add, in correct alphabetical order: “ <b>Fluazifop-p-butyl</b> <i>see</i> Fluazifop butyl”
<b>Fluazinam</b> Brassica (cole or cabbage) vegetables	Delete 0.01 Substitute *0.01	Also include full definition, as per instructions above.
<b>Flupropanate</b> Edible offal (mammalian)  Meat (mammalian) (in the fat)	Delete 0.1 Substitute *0.1  Delete 0.1 Substitute *0.1	
<b>Glyphosate</b> Adzuki beans Adzuki beans (dry)	Delete T10 Add T10	

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Imidacloprid</b> Fruiting vegetables, other than cucurbits Fruiting vegetables, other than cucurbits [except sweet corn, corn-on-the cob]	Delete 0.5 Add 0.5	
<b>Iprodione</b> Turmeric Root	Delete 5 Substitute T5	
<b>Lincomycin</b> Cattle milk	Delete 0.02 Substitute *0.02	
<b>Lufenuron</b> Cotton seed	Delete 0.2 Substitute T0.2	
<b>Metaldehyde</b> Turmeric Root  Vegetables	Delete 1 Substitute T1  Delete T1 Substitute 1	
<b>Methabenzthiazuron</b> Cereal grains  Grapes  Onion, bulb	Delete 0.05 Substitute *0.05  Delete 0.1 Substitute *0.1  Delete 0.05 Substitute *0.05	
<b>Methomyl</b> Turmeric, root	Delete T0.02 Substitute T*0.02	
<b>Methoprene</b> Meat (mammalian) Meat (mammalian) (in the fat)	Delete 0.3 Add 0.3	
<b>Methyl bromide</b> Fruit [except jackfruit, litchi, mango and papaya]  Vegetables [except cucumber and peppers]	Delete *0.05 Substitute T*0.05  Delete *0.05 Substitute T*0.05	
<b>Monensin</b> Poultry, edible offal of  Poultry meat (in the fat)	Delete 0.5 Substitute *0.5  Delete 0.5 Substitute *0.5	

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Oxyfluorfen</b> Edible offal (mammalian)	Delete 0.01 Substitute *0.01	
<b>Parathion-methyl</b> Meat (mammalian)	Delete *0.05 Substitute T*0.05	
Milks	Delete *0.05 Substitute T*0.05	
<b>Piperonyl butoxide</b> Poultry meat Poultry meat (in the fat)	Delete *0.5 Add *0.5	
<b>Propachlor</b> Brassica (cole or cabbage) vegetables, Head cabbages, Flowerhead brassicas	Delete *0.6 Substitute 0.6	
<b>Propargite</b> Hops, wet Hops, dry	Delete 3 Add 3	
<b>Pyrimethanil</b> Potato	Delete T*0.01 Substitute *0.01	
<b>Simazine</b> Rape seed	Delete 0.02 Substitute *0.02	
Tree nuts	Delete 0.1 Substitute *0.1	
<b>Spinosad</b> Peas (pods and succulent and immature seeds) Peas	Delete T0.2 Add T0.2	
<b>Sulphadoxine</b> Cattle milk	Delete 0.1 Substitute *0.1	
Edible offal (mammalian)	Delete 0.1 Substitute *0.1	Edible – initial letter in upper case
Meat (mammalian)	Delete 0.1 Substitute *0.1	Meat – initial letter in upper case

<b>Chemical Food</b>	<b>MRL (mg/kg)</b>	<b>Information</b>
<b>Sulphosulfuron</b> Edible offal (mammalian)	Delete 0.005 Substitute *0.005	Incorrectly spelled, amend to: “ <b>Sulfosulfuron</b> ” and include in correct alphabetical order.
Eggs	Delete 0.005 Substitute *0.005	
Meat (mammalian)	Delete 0.005 Substitute *0.005	
Milks	Delete 0.005 Substitute *0.005	
Poultry, edible offal of	Delete 0.005 Substitute *0.005	
Poultry meat	Delete 0.005 Substitute *0.005	
<b>Tebuconazole</b> Broad bean (dry)	Delete 0.5 Substitute T0.5	Initial letter in upper case
<b>Virginiamycin</b> Sheep, edible offal of	Delete 0.2 Substitute *0.2	
Sheep meat	Delete 0.1 Substitute *0.1	

## ATTACHMENT 3

### SUMMARY OF SUBMISSIONS RECEIVED

<b>Submitter</b>	<b>Comments raised</b>
Australian Food and Grocery Council.	Opposed the deletion and reduction of MRLs.
Australian Pork Limited.	Supported the Proposal.
Department of Agriculture Fisheries and Forestry.	Supported the Proposal.
Food Technology Association of Victoria.	Supported the Proposal.
People's Republic of China.	Requested data on glyphosate for rapeseed, edible.
Queensland Health supported the Proposal	Supported the Proposal.