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File

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Standards Management Officer
Food Standards Australia New Zealand
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Dear Sir / Madam

Submission – Consultation paper – Application A1133 – Maximum Residue Limits for Avilamycin in specific Pig Commodities

Thank you for the opportunity to provide a submission on the call for submissions regarding Application A1133 – Maximum Residue Limits for Avilamycin in specific Pig Commodities.

This submission provides technical advice and comments related to this issue. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government should notification be made by the FSANZ Board to the Australia New Zealand Ministerial Forum on Food Regulation.

The Queensland Department of Health has consulted with Safe Food Production Queensland (SFPQ) and the Department of Agriculture and Fisheries in the preparation of this submission. SFPQ has concerns that the proposed amendments are contrary to Australian consumer expectations and longstanding good agricultural practices that aim to eliminate the potential for agvet chemicals, including antibiotics, to be found in food. The Australian Pesticides and Veterinary Medicines Authority (APVMA) has not approved avilamycin for use in the treatment of pigs. Consequently SFPQ is seeking further information on the anticipated negative impacts on local growers/producers and the pork industry due to the competitive advantage gained by overseas markets where avilamycin is permitted for such use. SFPQ is also seeking clarification about how compliance of imported product with the proposed MRLs will be monitored at the border.

A further issue relating to the above matter is that the dietary exposure estimate for the proposed maximum residue limits (MRLs) for avilamycin provided in the consultation paper does not appear

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to take into account the situation that would eventuate if avilamycin was permitted for use by Australian pig farmers.

The consultation paper does not clearly explain why avilamycin is used in pig production. The paper offers the explanation that avilamycin *inhibits bacterial protein synthesis by binding to the 50S ribosomal subunit and it is highly effective against gram positive bacteria that are a normal component of the gastrointestinal microflora.*

The consultation paper does not reference the Australian Government National Antimicrobial Resistance Strategy 2015-2019 and its report, *Responding to the threat of antimicrobial resistance* (June 2015), which has been prepared to guide the response to the threat of antibiotic misuse and resistance. This report determines that programmes covering antibiotic use in animals and food production may have significant public health value in preventing the emergence of resistant strains and their spread to humans. Setting-specific, evidence-based guidelines and other resources and approaches are needed to encourage the development and implementation of antimicrobial stewardship programs in a variety of settings including veterinary practices and farms. Although the consultation paper has determined that avilamycin residues in edible pork products are highly unlikely to select for antimicrobial resistance, the Final Assessment Report would be strengthened if FSANZ provided comment on whether the proposed amendments to the *Australia New Zealand Food Standards Code* are consistent with the National Antimicrobial Resistance Strategy.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Department of Health on (07) 3328 9310 or at foodsafety@health.qld.gov.au

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