Proposal M1018 – Maximum Residue Limits (2020)

Comments from the Victorian Department of Health and the Victorian Department of Jobs, Precincts and Regions.

Due date of submission – 16 March 2021

Amended response submitted - 16 April 2021

The Victorian Departments of Health, and Jobs, Precincts and Regions (the departments) welcome the opportunity to provide comments on Proposal M1018 – Maximum Residue Limits (2020).

The departments note that a number of the proposed MRL changes differ from values set by either the European Union (EU) or CODEX, the latter of which is the principle source of MRLs at the international level.

One example of a proposed MRL level that does not accord with CODEX is Ametoctradin, where the current level 1.5 mg/ kg is being increased to 2.0 mg/kg for tomato on the request of the EU. The proposed maximum level is one third higher than that specified by CODEX (1.5 mg/ kg). Other examples include:

- Benzovindiflupyr in sugarcane: a new MRL at 0.3 requested by US, but in Codex the MRL is 0.04 mg/kg.
- Flutriafol in peanuts: increase in MRL from 0.05 to 0.09 at request of US, but Codex MRL is 0.15 from 2012.
- Kresoxim-methyl - Barley, similar grains, and pseudocereals with husks: from 0.1 to 15 (Codex 2019 noted 0.15 mg/kg) – likely to be a typographical error.
- Mefentrifluconazole changes requested by US. No National Estimate of Short Term Intake was required though these are tagged as new MRLs.

The departments seek further advice from FSANZ on the suitability of the proposed MRLs in Proposal M1018 for food consumed in Australia, where they are not consistent with levels set by CODEX.

The departments also seek advice on what consideration FSANZ has given to whether the higher MRLs proposed in M1018 will promote agvet chemical use that is inconsistent with Good Agricultural Practice in both Australia and in countries importing food to Australia, which could potentially result in higher levels of chemicals than necessary on foods.

The departments welcome further clarification of these queries in the approval report to support the progression of Proposal M1018.