

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

Due date of submission – 27 April 2022

The Victorian Departments of Health and Jobs, Precincts and Regions (the departments) welcome the opportunity to provide comments on Proposal M1020 Maximum Residue Limits (2021).

It is understood that Proposal M1020 is a routine proposal prepared by Food Standards Australia New Zealand (FSANZ) to vary Maximum Residue Limits (MRLs) of certain agricultural and veterinary (agvet) chemicals listed in Schedule 20 of the *Australia New Zealand Food Standards Code* (the Code) to align with both domestic and international MRLs.

Proposal M1020 includes consideration of MRL variations proposed by the Australian Pesticides and Veterinary Medicines Authority (APVMA), MRLs newly adopted by the Codex Alimentarius Commission, and MRL harmonisation requests from other interested parties. It also seeks to rectify relevant inadvertent errors identified by stakeholders.

On the basis that FSANZ's risk assessment indicates the proposed MRL's pose negligible chronic or acute safety risks to Australian consumers, we do not oppose the progress of Proposal M1020. We do, however, suggest a number of amendments to the drafting as outlined below.

- Remove tebufenozide from the list of chemicals to be omitted under Item [1.1]. There are a number of registered uses of this chemical in Australia and maintaining the MRLs for this chemical will align with the APVMA MRL standard.
- For the chemical pirimicarb, under Item [1.3], insert 'Fruit (except blackberries; strawberry) 0.5', and under Item [1.4], insert 'Fruit [except as otherwise listed under this chemical] 0.5'. This change is suggested as there are fruits other than blackberries and strawberry listed as commodities under pirimicarb. The change will ensure consistency with commodities listed under other chemicals and will help with interpretation of the Standard.

We also note there appears to be an error, with the agvet chemical name and permitted residue name interchanged for dichlorvos and dichlobenil under Item [1.3] (page 19) and Item [1.4] (page 25).