

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

**Due date of submission – 24 October 2019**

The Victorian Departments of Health and Human Services and Jobs, Precincts and Regions (the departments) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Food Standards Australia New Zealand (FSANZ) has called for submissions to Application A1181 – Maximum Residue Limit (MRL) for Imazapyr (a non-selective herbicide) in barley. The Application seeks to align the MRL for imazapyr residues in barley in Schedule 20 of the Code with the MRL currently listed in the Australian Pesticides and Veterinary Medicines Authority (APVMA) MRL Standard.

From the FSANZ's assessment report it is understood that:

- The MRL for imazapyr in barley will increase from 0.05 mg/kg in Schedule 20 of the Code to 0.7 mg/kg to align with the MRL in the APVMA MRL Standard gazetted in November 2018.
- Schedule 20 is an Australian only Standard.
- An application was required to amend Scheduled 20 as an appropriate legislative trigger for APVMA to amend the Food Standards Code was not satisfied.
- The proposed increase aligns with the international MRL for imazapyr in barley set by Codex, providing consistency across regulatory requirements for domestic and international producers and facilitating trade.
- The dietary exposure estimate undertaken by FSANZ indicates that the increased MRL for imazapyr in barley will pose negligible risk to health and safety for Australian consumers. This estimate utilised the Acceptable Daily Intake (ADI) published in the APVMA list of the *Acceptable Daily Intakes (ADI) for agricultural and veterinary chemicals used in food producing crops or animals* (Edition 2, 2019) and calculated a National Estimated Daily Intake (NEDI) of less than 1% of the ADI. The NEDI for imazapyr also considered all currently permitted uses and the proposed increased MRL for barley.
- FSANZ has concluded that there are no public health and safety issues associated with increased MRL for imazapyr in barley.

On the basis of the information above, the departments support the progression of Application A1181.