

**From:** Helene Fisher [REDACTED]  
**Sent:** Tuesday, 25 July 2017 5:15 PM  
**To:** submissions  
**Subject:** Submission

**Re: Call for submissions on changes to maximum residue limits**

**Purpose of the Proposal:** *to align the Code with Codex and trading partners.*

*I would suggest that Australia lead the way in setting standards based on assiduous testing of both combined cumulative and synergistic effects of agvet chemical residues in food, rather than simply focussing on changing the MRL of individual chemicals.*

<https://doi.org/10.1186/s12302-014-0014-5>

<http://www.mdpi.com/1099-4300/15/4/1416>

<https://ehjournal.biomedcentral.com/articles/10.1186/s12940-016-0117-0>

*In particular, may I recommend studies to be carried out over a minimum of two years to determine cumulative and not only immediate effects. Recognising the cost to the community of known health effects of Glyphosate, for instance, (certain cancers, Non-Hodgkins Lymphoma and the link to endocrine conditions and intestinal disorders), it would make sense that a method such as the DALY risk assessment process would be useful.*

*Through this method, estimates of the burden of disease can be made in an international context.*

*Acknowledging that the risk assessment of health effects of agvet chemicals is a challenging undertaking, I recommend that steps be put in place for the transition to a program of Risk Assessment being undertaken, for measuring even small increments in MRLs.*

*With thanks,*

*Helene Fisher*

*Member, Pesticides Action Group, WA*

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