



Food Standards Australia New Zealand
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Your Ref:
Our Ref: Managing low level chems
Enquiries: [REDACTED]
Date: 10 February 2015

Submission: Proposal P1027 – Managing low-level ag and vet chemicals without maximum residue limits

The Department of Agriculture and Food, Western Australia (DAFWA) supports the proposal to establish a low level maximum residue limit (MRL) for *all other foods* for specific chemical/ food combinations in the chemical categories of herbicides, fungicides and insecticides.

DAFWA recommends Food Standards Australia New Zealand (FSANZ) also consider the inclusion of certain veterinary chemical/ food combinations within the scope of this proposal. Some veterinary chemical/ food combinations such as coccidiostat residues in eggs and semicarbazide residues in honey and shellfish carry an equally low risk to food safety as the chemical categories within the scope of the existing proposal. Further, while concern about antimicrobial resistance is warranted, not all veterinary products contribute to antimicrobial resistance and/or have minimal risk of carry-over to human populations.

In relation to nicarbazin residues in eggs, the European Food Safety Authority (EFSA) published a scientific opinion on contaminants in the food chain (EFSA Journal (2008) 690, 1-34) which concluded there was no appreciable risk to human health from the ingestion of nicarbazin residues in products from animals exposed to cross contaminated feed up to 10% of the maximum authorised level (50 mg/kg).

The EU published new regulations (610/2012) which set MRLs for the presence of coccidiostats in food resulting from unavoidable carry-over of these substances in non-target stock feed. The EU determined that cross contamination of non-target stock feed with coccidiostats was unavoidable where feeds are mixed on the same line. The published EU MRL for nicarbazin residues in eggs is 300 parts per billion (ppb).

Western Australia has had four National Residue Survey (NRS) notifications of nicarbazin residues in eggs in the past two years, with all detections less than 100 ppb. DAFWA investigation of the nicarbazin residue detections concluded that cross contamination of layer hen feed occurred at the feed mill on all occasions. These investigations require significant resources from DAFWA, the feed mill and the owner of the layer hens for an appreciably low risk to food safety.

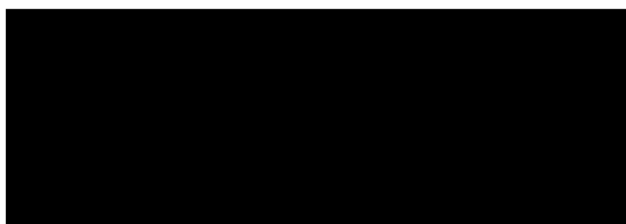
DAFWA has had previous discussions with the APVMA and FSANZ regarding the establishment of MRLs for coccidiostats in non-target food. Neither organisation has yet facilitated the establishment of an MRL for these low-risk residue violations. The inclusion of coccidiostat residues in eggs in the scope of this proposal will likely eliminate the need to investigate many of these reported residue violations.

In relation to semicarbazide (SEM) residues, there has been much published data regarding the many sources of SEM, ranging from a metabolite of the banned antibiotic nitrofurazone, through to the plastic sealing gaskets in metal lids in food bottles, a dough improver, hypochlorite bleach and a natural compound present at background levels in shellfish and honey produced from certain vegetation such as Scottish red heather and New Zealand manuka bush.

As it stands, laboratory testing is unable to distinguish between naturally occurring SEM, misuse of nitrofurazone and other sources of SEM. While laboratory testing is unable to overcome the uncertainty of SEM as marker of nitrofurazone use, government authorities such as DAFWA will continue to undertake resource intensive residue investigations to rule-out the misuse of nitrofurazone.

New Zealand has established a residue action limit for investigation into SEM in honey which acknowledges that SEM can occur naturally from certain plants. Scotland has undertaken research into the natural formation of SEM in honey from hives placed on heather and is looking to a similar system as New Zealand. The inclusion of SEM residues in honey and shellfish in the scope of this proposal would be strongly supported by DAFWA.

Sincerely



State Residue Coordinator
Department of Agriculture and Food Western Australia