

Maximum Residue Limits (aka. Tolerances) in Australia and APEC – facilitating trade and protecting the consumer

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Overview

1. Australia's food regulatory system & MRLs
2. Overview of the APEC Import MRL Guideline for Pesticides (the Guideline)
3. Australia's implementation of the Guideline
4. Other APEC projects
5. Summary and Conclusions



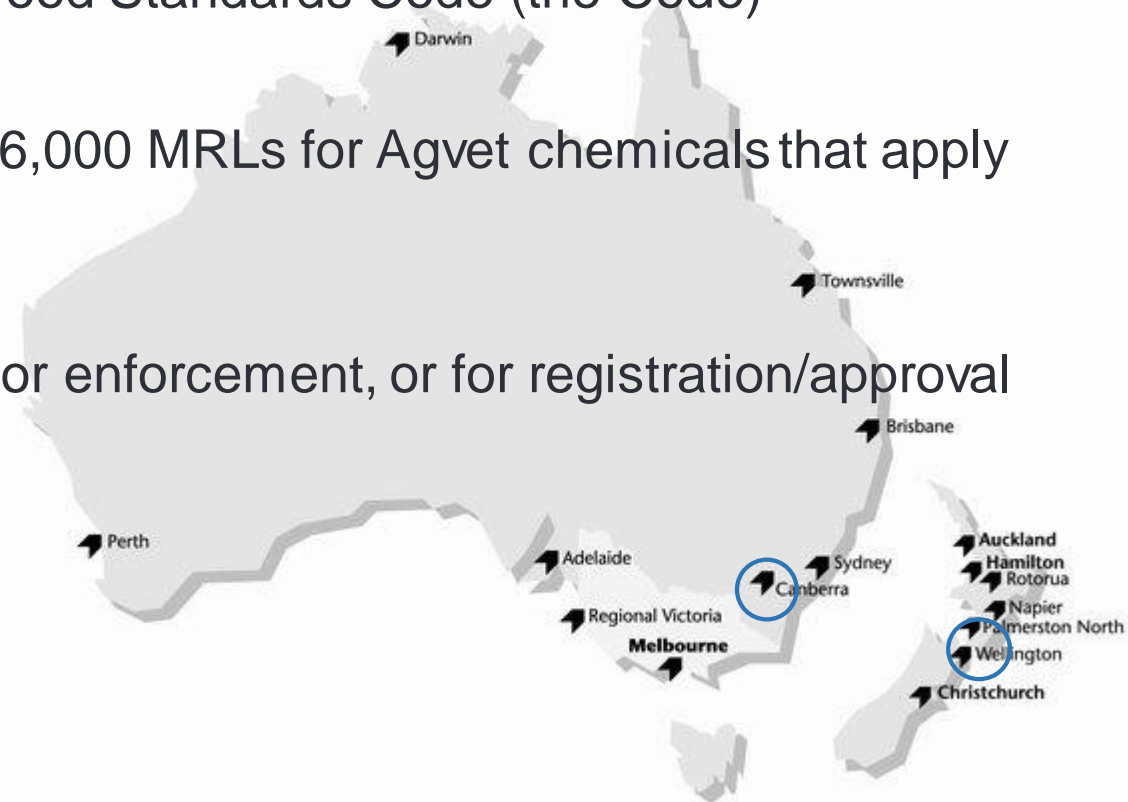
Part One

Australia's food regulatory system – Domestic and Import MRLs

FSANZ - About us



- FSANZ is an Australian statutory agency which develops the Australia New Zealand Food Standards Code (the Code)
- The Code includes over 6,000 MRLs for Agvet chemicals that apply to Australia only
- FSANZ not responsible for enforcement, or for registration/approval of pesticide use.



Incorporating MRLs into the Code – Domestic process

- Two Australian government agencies with shared responsibilities for MRLs, and two MRL standards



- The *Australian Pesticides and Veterinary Medicines Authority* (APVMA) - **Domestic control of use** (APVMA MRL standard)
 - Food Standards Australia New Zealand (FSANZ) - apply **at point of sale and for food imports** (Schedule 20 of the Code)
- FSANZ provides food consumption data and dietary exposure assessment expertise



Low level residue MRLs

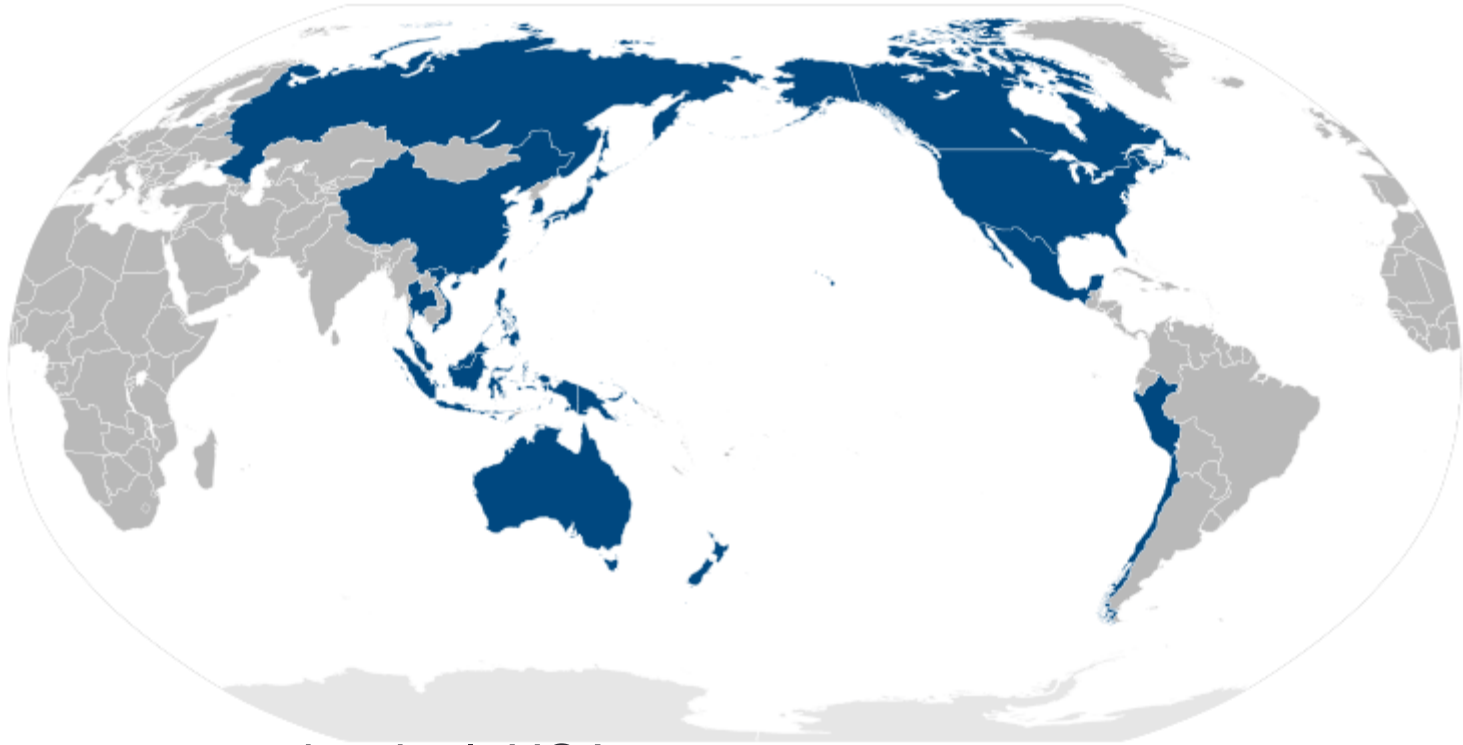


- Low level residue MRLs program
- Inadvertent presence of residues that are not safety concern
 - spray drift, transport, rotational crops etc.
- All other foods (AoF) except animal food commodities (ref. P1017 – 2014)
 - Not a default level – all considered on a case-by-case basis
 - 265 agvet chemicals have been assessed for AoF MRL
- Not intended to accommodate off-label use

Part Two

Overview of the APEC Import MRL Guideline for Pesticides (the Guidelines)

Asia-Pacific Economic Cooperation (APEC)



21 economies, incl. USA.

Formed in 1989

2.7 billion people

>50% of global GDP.

APEC – Context and FSCF

APEC Food Safety Cooperation Forum (FSCF)

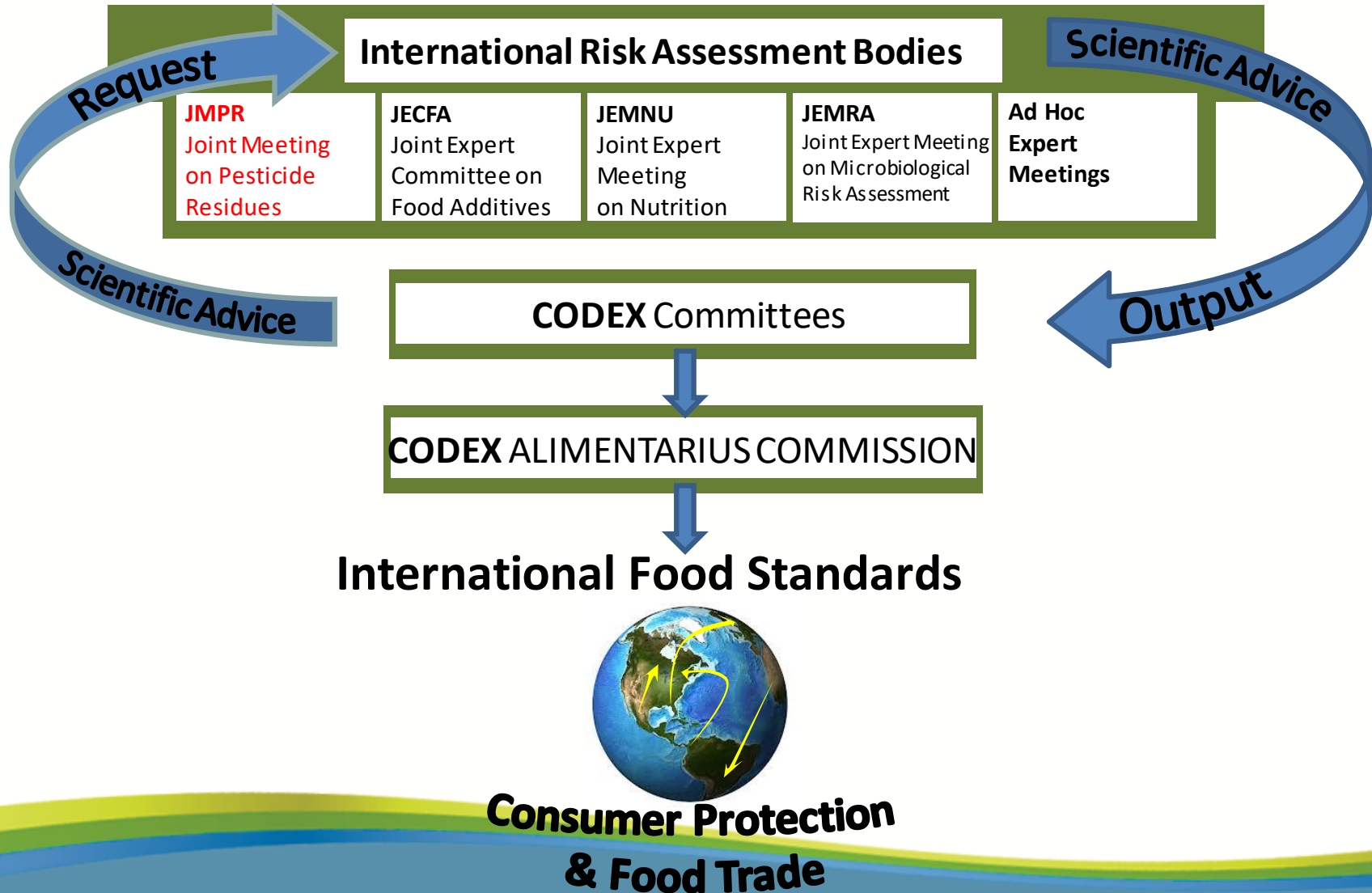
What is the context?

- Increase in global trade in food
- Implementation of international standards variable.
- Convergence in regulatory systems desirable
- Codex MRLs

So what is the FSCF?

- Food safety regulators from APEC economies
- Formed & cochaired by Australia & China (2007-)
- Biennial intergovernmental meeting & ongoing workshops
- Complimentary to the work of Codex Alimentarius

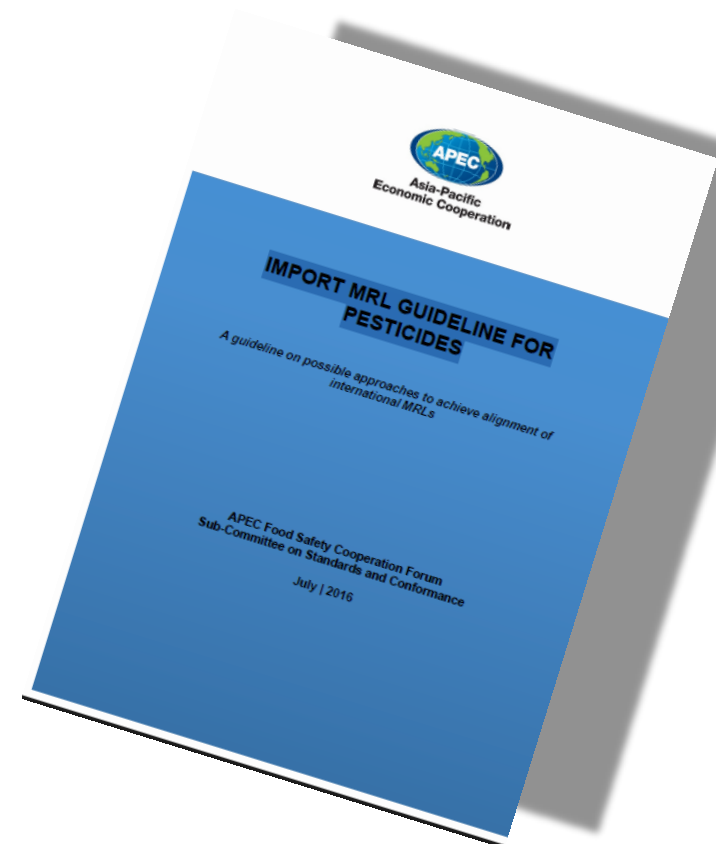




Harmonising Import MRLs

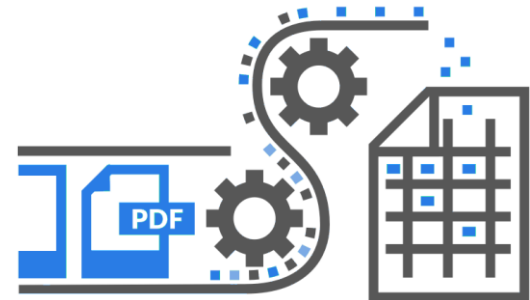


- APEC MRLs Roadmap – developed by FSCF in June 2014
- **Self-funded APEC project by Australia**
- **Phase 1** (2014-2016). Development of an *APEC Guideline on Import MRLs for Pesticides* through workshops
- **Phase 2** (2017). Training through an expert workshop (Canberra, Feb 2017) & translation of Guideline into Chinese, Spanish and Vietnamese.



Additional tools to support the Guideline

- **Phase 3** (2018-2019) of Australian Self-funded project
- Compendium of Government Administration in setting MRLs for pesticides
 - Is a snapshot of current particulars/elements of system.
 - Regulations
 - Competent authority
 - Codex / Third country recognition,
 - Formal process, Timeframes, etc.
- Common APEC MRL Application Template – [available online](#)
 - Guide to data requirements is not a formal application
 - Pesticide details
 - Residue definitions
 - HBGV
 - Commodity details, proposed MRL & source
 - Additional information, e.g. volume of imports, etc.
- Endorsement by APEC economies in Chile, May 2019



Principles underpinning Guideline

- Recognition of differing pesticide use among economies
- Science-based using internationally accepted risk assessment methodologies.
- Minimization of data requirements
- Protection of public health and safety, while facilitating trade.
- Emphasis on use of Codex MRLs, including supporting JMPR monographs, where such MRLs exist.

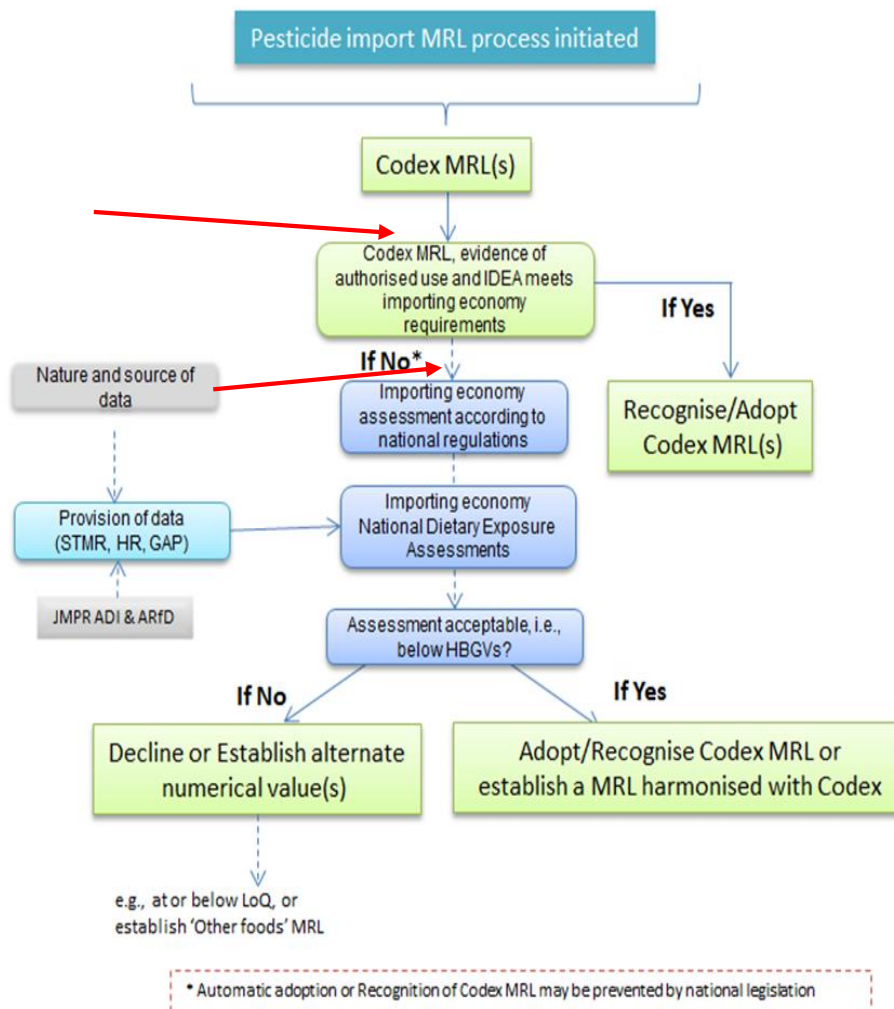
Ha Noi FSCF Statement, 13 May 2017

Economies ..encouraged to ensure that their import MRL systems are based on the approaches contained in the Guideline.

Applying the APEC MRL guideline – six scenarios

Scenario one:

Consider adopting Codex MRL



Part Three

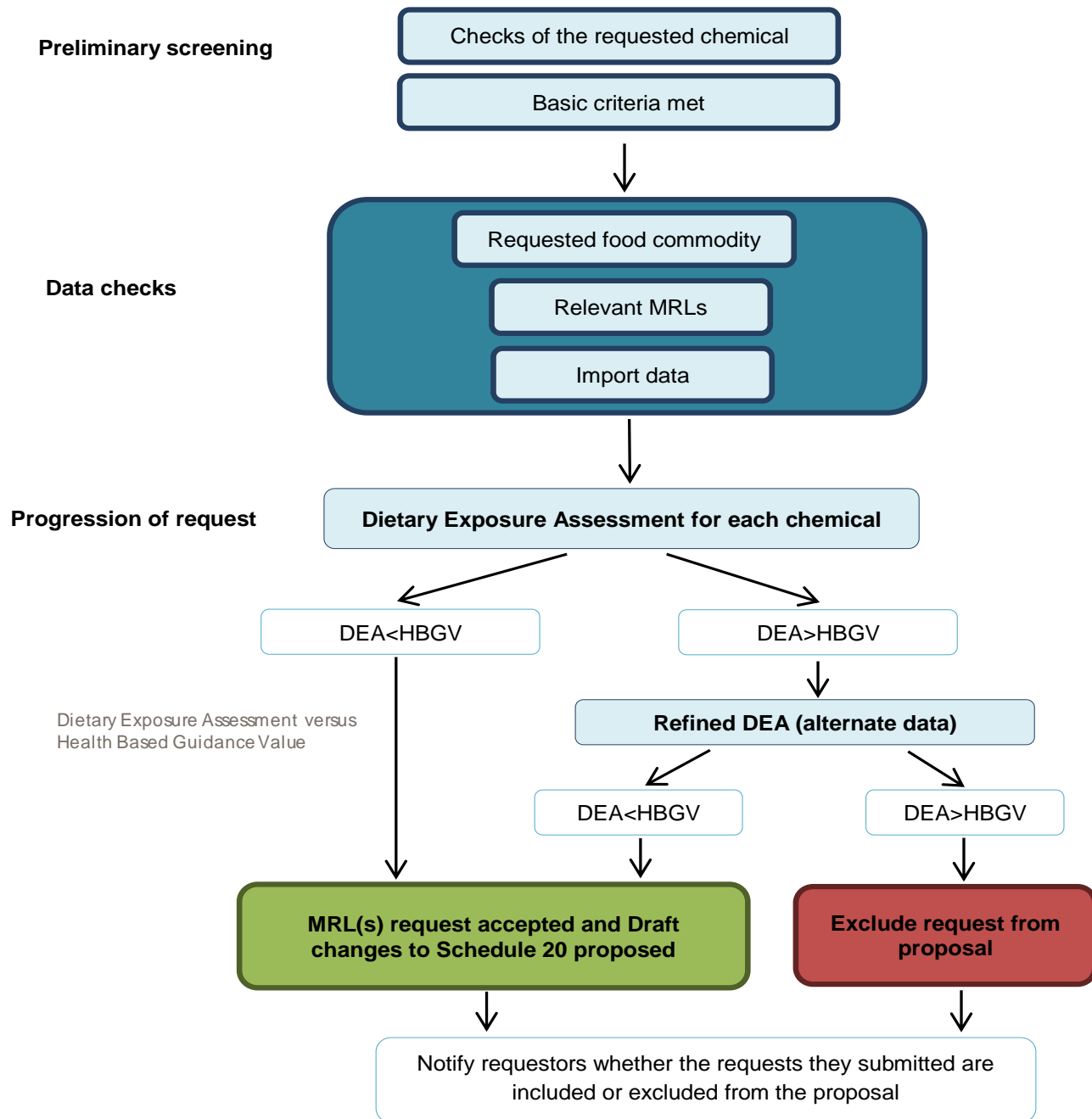
Australia's implementation of the Guideline for considering import MRLs

Australia's use of the Import MRL Guideline

Annual 'harmonisation process'

- FSANZ implementation of system consistent with APEC guideline
- Annual call for requests to align with Codex MRLs and international trading partners' MRLs (Scenarios 2,3,4)
- Recognises GAP in other countries based on 'need'
- Consistent with WTO SPS obligations
- MRLs approved if certain 'tests' are satisfied





Australia's use of the Import MRL Guideline

- Submission of a request does not mean automatic approval
- Information screened and data provided cross-checked
- Risk assessment 'test' - dietary exposure assessment for each MRL
 - Codex / other country MRL – Australian HBGV first, then JMPR, or other
 - MRLs are **only** included if estimate of dietary exposure does not exceed HBGV
- Other 'tests' are:
 - Legitimate use of the chemicals in producing food
 - Planned importation into Australia and timelines
 - Satisfies Dept. of Agriculture biosecurity requirements ie. quarantine
- *All other foods except animal food commodities* MRLs considered simultaneously
- Process usually takes 9 – 12 months - free of charge!
- FSANZ added or increased approx. 1,300 import MRLs

New!

BREAKING NEWS

Decision on *routine* consideration of *new* Codex
MRLs soon!

Part Four

Other APEC projects

Other APEC projects

Australian-led project



- *Trade facilitation through the development of an APEC food safety risk communication framework* is aimed to:
 - Develop food safety risk communication framework to guide APEC economies and food industry undertaking food safety risk communication and enhance consumer trust.
 - Virtual Workshop to be held in July 2020
 - EWG & two further Workshops

Other APEC projects

USA-led project

Enforcement of Pesticide MRLs

- Workshop was planned on the margins of Pacifichem, Hawaii - Dec 16-17 2020 (tentative)
- Presentation of APEC-wide survey on MRL enforcement and compliance practices of APEC economies
- Discussion of challenges and areas for improvement for economies to bolster their risk-based regulation of pesticide use on specialty crops
- Possible EWG formation to create best practices guidance document



Part Five

Summary and Conclusions

Summary and Conclusions

- Two lists of MRLs – APVMA & FSANZ
- FSANZ MRLs for imports and point of sale within Australia
- APEC has been active in the MRL space
- Australia self-funded project developed Import MRL Guidelines - implemented by Australia. 1,300 new MRLs
- Now considering the routine consideration of *new* Codex MRLs
- APEC FSCF planning further relevant work, including on risk communication and MRL compliance.

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