FOOD REGULATION PUBLIC CONSULTATION PAPER
ON
DRAFT MINISTERIAL POLICY GUIDELINES
FOR
The regulation of residues of agricultural and veterinary chemicals in food.

Produced for the Food Regulation Standing Committee
By its Working Group for the regulation of residues of agricultural and veterinary chemicals in food.
April 2006
1 Introduction

The Food Regulation Standing Committee is responsible for coordinating policy advice to the Australia New Zealand Food Regulation Ministerial Council (the Ministerial Council) and advises the Ministerial Council on the initiation, review and development of Policy Guidelines.

The Food Regulation Standing Committee has developed this document to seek community views on the proposed draft Ministerial policy guidelines regarding alternative approaches to address issues surrounding the regulation of residues of agricultural and veterinary chemicals in food. Following the consultation period, the revised policy guidelines and a summary of submissions will be forwarded to the Ministerial Council. If approved by the Ministerial Council, the policy guidelines will be provided to FSANZ to form the framework within which any alternative approaches will be considered. Standard 1.4.2 of the Food Standards Code - *Maximum Residue Limits* (MRLs) does not apply to New Zealand.

**Important notice to all submitters:** All submissions are subject to the Freedom of Information Act 1982 in Australia. If you consider that all or part of your submission should not be released, please make this clear when making your submission and indicate the grounds for withholding the information.

A general summary of submissions will be produced and published on the Food Regulation Secretariat [website](#).

Copyright in an original submission resides with the copyright owner of that submission, but the act of making a submission will grant the Australian Government a licence to use the submission for the purpose of making a summary of the submission for the website and for future policy or standard development work.

Electronic submissions to the e-mail addresses below are preferred.

Submissions should be provided using the response form provided, or in a similar format, by **Tuesday, 30 May 2006** to:

**Australia**

Submissions – Regulation of residues of agvet chemicals in food.
C/- Food Regulation Secretariat
PO Box 4
WODEN ACT 2606
Or email the [Food Regulation Secretariat](#)
Or fax to: (02) 6289 5100
2 Purpose

The purpose of this paper is to seek stakeholder comments on the draft Ministerial Policy Guidelines regarding alternative approaches to address issues surrounding the regulation of residues of agricultural and veterinary chemicals in food.

The paper:
- discusses the current approach used to regulate the residues of agricultural and veterinary chemicals in food including:
  - identifying issues and limitations associated with this approach;
  - the international approaches that are in place to deal with similar issues;
  - a discussion of impacts on public health, industry and government.
- proposes draft Ministerial Policy Guidelines.

Submissions are welcome on both the intent and wording of the Ministerial Policy Guidelines and on what alternative approaches might be taken.

If approved by the Ministerial Council, the policy guidelines will be provided to FSANZ to form the framework within which any alternative approaches to address the issues associated with the existing regulatory system for managing residues of agricultural and veterinary chemicals in food will be considered.

If FSANZ considers it appropriate to develop alternative approaches, stakeholders will have opportunities to make further submissions during the FSANZ public consultation process.

3 Current Approach

3.1 Australia

3.1.1 Current Regulatory System

Standard 1.4.2 of the Food Standards Code (the Code) - Maximum Residue Limits (MRLs) regulates the residues that are permitted in food. MRLs are listed in the Schedules to the Standard for permitted chemicals along with the specific commodities or food products that may contain them.

Standard 1.4.2 of the Code defines MRLs as the maximum level of a chemical which is permitted to be present in a food. The concentration is expressed in milligrams per kilogram (mg/kg) of the food.

MRLs indicate the highest residue that may result following the use of an approved agricultural and veterinary chemical according to good agricultural or veterinary practice in Australia. Strictly speaking, MRLs are not food safety limits but are set at the highest level that may result from Good Agricultural Practice (GAP\(^1\)), providing that such levels do not represent an unacceptable risk to public health. MRL setting process and enforcement in Australia is explained in Appendix 3.

Currently, under Australian State, Territory and Commonwealth Government food legislation

\(^1\) The nationally recommended, authorised or registered use-pattern of chemicals, that is necessary for effective and reliable pest control under actual conditions at any stage of production, storage, transport, distribution and processing of food commodities and animal feed.
(subject to some exceptions for food from New Zealand), there must be no detectable residue in a food commodity for which an MRL has not been established in Standard 1.4.2 of the Code. For example, where a chemical is not listed for a specific food commodity or where a food commodity is not listed for a specific chemical, a zero tolerance approach is taken.

New Zealand has its own MRL system and under the Trans Tasman Mutual Recognition Arrangement (TTMRA), food produced in or imported into New Zealand can be legally sold in Australia provided it complies with the New Zealand (Maximum Residue Limits of Agricultural Compounds) Food Standard, 2005 (2). Similarly, food produced or imported into Australia, which complies with Standard 1.4.2 of the Code, can be legally sold in New Zealand.

3.1.2 Issues identified with the current regulatory system

The key problem identified in the current regulatory approach is the ‘no detectable residue’ (zero tolerance approach) requirement for the chemicals for which no MRL has been established in Standard 1.4.2 of the Code. Increasingly sophisticated analytical techniques can detect very low levels of residues in food that were previously undetectable, and those residues may pose only a very low risk to public health at the levels detected. When low level residues of agricultural and veterinary chemicals with no MRL are found in food, such a food commodity becomes illegal for sale even if it poses a very low risk to public health. The zero tolerance approach places a significant financial burden on industry, jurisdictions and the consumer.

3.2 International approaches to residues of agricultural and veterinary chemicals in food.

Many countries including the US, UK, Canada and New Zealand have a well-developed regulatory system for managing the residues of agricultural and veterinary chemicals. Similar to Australia, their MRLs are chemical and commodity specific. A summary of other country MRL systems is provided at Appendix 1.

The issue of managing residues of agricultural and veterinary chemicals in food with no specific MRL in the National MRL standard is not limited to Australia. A number of countries have adopted different approaches including setting up a low level default MRL (EU, NZ, Canada and Japan), recognising Codex MRLs (NZ and UK), or a combination of these approaches.

3.2.1 The concept of a default MRL

Some countries have adopted a default MRL to manage incidental low level residues in food while not compromising public health. The default MRL allows food containing low level residues for which no specific MRL is set to be legally sold under the conditions that the residues are less than or equal to the default level and the identified chemicals pose only a very low risk to public health. A default MRL is usually accompanied by a restricted chemicals list for which the default level would not apply.

The value of the default MRL varies from country to country and is not chemical or commodity specific. For example, in New Zealand, a default MRL value of 0.1mg/kg is applied to any chemical residues detected in foods for which no specific MRL has been set while the European Community and Japan have a default MRL value of 0.01mg/kg. Additionally, Japan and the European Community’s food standards include a restricted list of agricultural and veterinary chemicals for which, due to public health concerns, no residues are acceptable at any level in food.
In addition to chemicals included on restricted substances list, if any other residue posed an unacceptable risk to public health the default level would not apply. This is generally ensured through urgency provisions in the legislations that could be used to ‘override’ the default level and thus prevent the legal sale of foods containing ‘unsafe’ residues.

An example of a country where a default MRL is used within the regulatory framework is Japan. A case study is provided below.

### 3.2.2 Case Study: MRL system in Japan

Japan's Ministry of Health, Labour and Welfare will change the way it regulates residues of agricultural chemicals and veterinary medicines from 29 May 2006. The current Japanese law only enables the Ministry to act against residues found to be above prescribed levels (MRLs) for approximately 283 chemicals. This approach will change to one where residues of all agricultural chemicals and veterinary medicines are regulated in a practical way that is commensurate with the risk posed to public health called the Positive List System. Main features of the new system are:

- MRLs are both chemical and commodity specific;
- new "provisional" (though legally binding) MRLs for 799 chemicals;
- a default MRL of 0.01 mg/kg (i.e. 10 ppb) exists for all other chemicals where there is no MRL; and
- a list of restricted chemicals (residues of which are not to occur in food at any level).

Under this system, it is expected that all food must comply with MRLs where they exist. Some of these MRLs are provisional, and an ongoing assessment will confirm the final MRLs. In the event where there is no MRL, a default level of 0.01 mg/kg will apply to all chemicals, with exception of restricted chemicals, the residues of which are not to occur in food at any level. It is expected that this system will provide the Japanese Government with a practical way to regulate residues in food in a way that is appropriate to the risk posed to public health.

### 3.2.3 Codex MRLs

The Codex Alimentarius Commission (Codex) is a joint Food and Agriculture Organisation (FAO)/ World Health Organisation (WHO) body. It develops food standards to protect the health of consumers, ensure fair trade practices in the food trade, and promote co-ordination of all food standards work undertaken by international governmental and non-governmental organisations.

Since its inception, Codex through its subsidiary committees has given top priority to protecting the health of consumers while ensuring fair practices in international trade. Towards that aim, Codex has developed MRLs for agricultural and veterinary chemicals in food. Codex MRLs are set to reflect a legitimate use of chemicals in the global arena with a wide range of Good Agricultural Practices to address a wide variety of pests and diseases in different climates and ecosystems.

MRLs set by Codex are indicative and not statutory, and are used as guidance on acceptable levels of residues in international food trade. Codex MRLs, similar to MRLs in Australia, are chemical and commodity specific.

Codex MRLs are recognised in many countries for imported foods including the UK and New Zealand food regulatory systems. Like Australia, the US and Japanese food regulatory systems give due regard to established Codex MRLs when developing their own MRLs.
In developed countries Codex MRLs usually apply only to imported foods, thus helping to minimize potentially negative trade effects.

Australia actively participates in the work of Codex, and has made significant contributions to developing Codex MRLs through on-going involvement in Codex activities. Australia, whenever feasible and/or desirable provides appropriate data for the elaboration of Codex MRLs, ensuring that elaborated MRLs take account of Australian GAP and MRLs. In addition, Codex MRLs are taken into account when Australian MRLs are established. However, Australia does not use Codex MRLs for imported foods but rather has a policy whereby imported foods must meet the same standards as domestically produced food, including those for MRLs.

An example of a country where Codex MRLs are used with in the regulatory framework is New Zealand, and a case study is provided below.

3.2.4 Case Study: MRL system in New Zealand

In New Zealand, agricultural compounds and veterinary medicines are required to be registered under the Agricultural Compounds and Veterinary Medicines Act 1997 (the ACVM Act). Although the process of MRL setting is related to registrations under the ACVM Act, the MRLs themselves are set under the Food Act, as Food Standards, which are deemed regulations. Currently MRLs are regulated under the New Zealand (Maximum Residue Limits of Agricultural Compounds) Food Standards 2005 (No.2).

Main features of the New Zealand MRL system are:

- New Zealand MRLs are chemical and commodity specific;
- Codex MRLs apply only to imported foods in the New Zealand system; and
- a default MRL of 0.1 mg/kg applies for all other chemicals where there is no specific New Zealand MRL or Codex MRL.

A default MRL of 0.1mg/kg applies to chemical residues in domestic and imported food not specifically listed in legislation. This value applies to all chemicals where there is no public health concerns associated with the consumption of the chemical at the default value. It does not, however, apply to chemicals where public health concerns would arise from consumption at the default value. These chemicals are regulated either by specific limits or by Section 9(4) of the Food Act 1981 under New Zealand legislation.

Under this system domestically-produced food can legally be sold in New Zealand if:

• it complies with the appropriate New Zealand MRL; or,
• where there is no specific New Zealand MRL for the food/residue combination, it complies with the default MRL of 0.1mg/kg.

2Imported food can legally be sold in New Zealand if:

• it complies with New Zealand’s MRLs; or
• it complies with MRLs set by the Codex Alimentarius Commission; or
• irrespective of the above, where there is no New Zealand or Codex MRL for the food/residue combination, it may comply with the default MRL of 0.1mg/kg.

---

2 Food imported into New Zealand from Australia is a special case. Under the Trans Tasman Mutual Recognition Arrangement (TTMRA) any food that can be legally sold in Australia may also be legally sold in New Zealand.
4 Issues for Key Stakeholders

4.1 Public health

MRLs are not food safety limits (see Section 3.1.1). However, MRLs are adopted into food legislation where it can be demonstrated that the dietary exposure associated with the residues does not exceed the acceptable daily intake or acute reference dose of the chemical. The Australian Pesticides and Veterinary Medicines Authority (APVMA) and FSANZ will not establish an MRL where the dietary exposure to the residues of a chemical could represent an unacceptable risk to public health and safety. Similarly, the APVMA would not register an agricultural and veterinary chemical for use on food commodities where the use of the chemical posed a risk to public health. The process of setting an MRL is explained in Appendix 3.

MRLs established in the international context are also based on GAP. Given that other countries have different pests and diseases, it is likely that chemicals that are not used in Australia may be used in other countries. Currently, all foods imported into Australia must comply with the requirements of both the Quarantine Act 1908 and the Imported Food Control Act 1992. Under this legislation, all imported food must comply with the residue requirements of Australia’s Food Standards Code, thus ensuring that all domestic and imported food meets the same standards.

4.2 The food industry and growers

Cost of Compliance

The current zero tolerance approach fails to recognise the increasing sensitivity of analytical techniques, or that very low but detectable residues may occur in commodities following legitimate use of a chemical, for which no MRL has previously been established. The requirement to ensure that there is no detectable residue present in food for which no MRL is established places an obligation on food producers that is becoming increasingly difficult, if not impossible, to meet.

The detection of a residue of a chemical for which no MRL is set in a particular food commodity is likely to result in condemnation or rejection of that food. Growers are unlikely to be paid for rejected or condemned produce. Where the grower has been paid, the loss may be carried by other supply chain participants. Growers may also face cancellation of supply contracts or be required to meet additional conditions such as enhanced residue testing requirements. These costly outcomes are often publicised and may lead consumers to the mistaken perception that the food supply is unsafe.

An additional opportunity cost is that industry quality assurance resources can be diverted from more important food safety tasks by the need to address technical breaches of food standards that:

- present a very low risk to public health; and
- do not represent any misuse by users of agricultural and veterinary chemicals.

The increasing cost of the current “zero tolerance” approach, which delivers no public health benefit, is now undermining the primary aim of consumer protection and the safe use of agricultural and veterinary chemicals.

Trade Issues

Both Codex MRLs and the MRLs in Standard 1.4.2 apply to many of the chemicals used in
the production of agricultural commodities that Australian producers supply to international markets. As a net exporter of food commodities Australia’s application of the current approach to residues creates a variety of difficulties. Not least of these are the perceived inconsistencies between the current system and Australia’s efforts to encourage more appropriate management of residue issues in global trade.

A primary objective for the establishment of Codex MRLs is to protect the health of consumers and to ensure fair practices in international food trade. Increasing harmonisation of food standards internationally may encourage fair trade and benefit Australia as a net food exporter. Therefore, the current zero tolerance approach may have implications for Australia’s World Trade Organization (WTO) Agreements (Appendix 2).

4.3 Government

Enforcement in the domestic market

Currently, regulators are legally obliged to respond to situations where:

- a chemical residue exceeds the level set out in Standard 1.4.2 of the Code; or
- any detectable residues of a particular chemical are identified in a particular commodity and no MRL is set for that chemical in that food commodity.

Responding to residues that pose a very low risk to public health and that do not reflect a failure to comply with registered conditions of use does not allow the most appropriate use of jurisdictional resources. This in turn increases the cost to governments of regulating the food supply without providing any commensurate community benefit. Reporting breaches of standards that are of a very low risk to public health and which do not reflect any failure to comply with registered conditions, can send incorrect messages to consumers and industry.

Enforcement at the border

In addition to State and Territory enforcement activities, the Australian Quarantine and Inspection Service (AQIS) are responsible for enforcing Standard 1.4.2 under the Australian Government’s Imported Food Programme. As previously discussed, the MRLs in the Code reflect use of chemicals in Australia. However, under these current arrangements AQIS is obliged to take action to prevent entry of non-complying imported food that exceeds MRLs for Australian conditions even though they may present a low risk to public health. This can include taking action against imported foods that contain residues that are compliant with Codex and exporting country MRLs. This requirement places an unnecessary burden on regulatory resources and also warrants consideration in light of Australia’s obligations to the WTO Sanitary and Phytosanitary Agreement (SPS) agreement.

5 Draft Policy Principles

Draft policy principles consist of guiding principles and specific policy principles, both of which together form a basis for the development by Ministerial Council of Ministerial Policy Guidelines.

Guiding Principles

High Order Policy Principles – govern the general direction of, and apply to, development of all food regulation policy guidelines. Therefore, we are not seeking comments on these
guiding principles.

The FSANZ Act 1991 establishes a number of objectives for FSANZ in developing or reviewing food regulatory measures. They are:

1) The objectives (in descending priority order) of the Authority in developing or reviewing food regulatory measures and variations of food regulatory measures are:
   a) the protection of public health and safety;
   b) the provision of adequate information relating to food to enable consumers to make informed choices; and
   c) the prevention of misleading or deceptive conduct.

2) In developing or reviewing food regulatory measures and variations of food regulatory measures the Authority must also have regard to the following:
   a) the need for standards to be based on risk analysis using the best available scientific evidence;
   b) the promotion of consistency between domestic and international food standards;
   c) the desirability of an efficient and internationally competitive food industry;
   d) the promotion of fair trading in food; and
   e) any written policy guidelines formulated by the Council for the purposes of this paragraph and notified to the authority.

Draft Specific Policy Principles

Specific Policy Principles are principles that support and must be read within the High Order Principles. These specific principles apply only to alternative approaches that FSANZ might consider for addressing the issues associated with the current zero tolerance system to regulate residues of agricultural and veterinary chemicals with no MRL in food.

Comments are sought on the following draft specific principles.

Any changes to the existing regulatory approach for the regulation of residues of agricultural and veterinary chemicals in food should:

1. recognise the need to respond to any unexpected presence of residues in an efficient and timely manner.
2. not reduce the capacity of governments to prohibit the presence of any residue of a particular chemical in food where it would present an unacceptable public health risk.
3. be consistent with the minimum effective regulation of the registration, permission and use of agricultural and veterinary chemicals.
4. promote consistency of MRL requirements for both domestic and imported foods.
5. be consistent with Australia’s obligations to World Trade Organisation (WTO) Sanitary and Phytosanitary Agreement (SPS Agreement).

Please provide reasons, scientific evidence and any other evidence to support your responses.

Are the draft policy principles listed above appropriate and adequate in developing alternative approaches to address the issues associated with the current zero tolerance system?

If not, are there other Policy Principles that should be included?
6 Appendices

6.1 Appendix 1: International Approaches

European Community
The European Community (EC) has a comprehensive list of MRLs for agricultural and veterinary chemicals in food. The setting of MRLs in the EC operates on a basis of using the minimum effective dose necessary to achieve effect, whilst protecting the health of vulnerable groups in the population, such as children and the elderly. The EC also recognises a default MRL of 0.01 mg/kg for those chemicals not listed in its legislation. The development of EC MRLs requires consideration of limits set by Codex and other countries where those MRLs have been set by following the same criteria as that used for the setting of EC MRLs.

UK
The regulation of agricultural and veterinary chemicals in foods is governed by Statutory Instrument 1999 no 3483 in the UK. This instrument lists all MRLs for agricultural and veterinary chemical residues in food permitted in the UK. The UK regulations (Food Safety Act 1990) also suggest that compliance with Codex MRLs and/or EC MRLs would be acceptable for trading food commodities in the UK for those compounds not listed in Statutory Instrument no 3483. A food may also comply with UK regulations even if it does not have a UK, EC or Codex MRL if it can be demonstrated that the food complies with the necessary criteria of the Food Safety Act 1990. EU and UK regulations governing agricultural and veterinary chemicals in food are being harmonised.

USA
Section 346(a) of the US Federal, Food, Drug and Cosmetic Act regulates MRLs of agricultural and veterinary chemicals in food. The Act contains a positive list of approved substances with prescribed limits; the Act also describes MRLs for the metabolites of approved substances and review processes for substances once added to the positive list. Under the US system, due regard must be given to Codex MRLs, and if it is decided that a Codex MRL is inappropriate for domestic use, clear reasons must be stated why the Codex MRL cannot be adopted.

Canada
Divisions 15 and 16 of the Food and Drug Act Regulations (FDAR) govern the MRLs of agricultural and veterinary chemicals in foods in Canada. If a food contains a residue at a level higher than that specified in the FDAR, the food is considered 'adulterated' and is prohibited from the food supply. Recent information from Canadian authorities advises that “Canada is in the process of revoking its general pesticide 0.1ppm general limit and replace it with specific MRLs for each pesticide and food combination below 0.1 parts per million (ppm)”. Canada has a zero tolerance approach to all agricultural and veterinary chemicals not listed in Divisions 15 and 16 of the FDAR.

6.2 Appendix 2: World Trade Organization Sanitary and Phytosanitary Measures Agreement
The World Trade Organization (WTO) agreements are the legal foundation which underpin the international trading system used by the majority of the world’s trading nations. Australia is a party to the WTO agreements, including the Agreement on the Application of Sanitary
and Phytosanitary Measures, referred to as the SPS Agreement. The SPS Agreement entered into force in 1995 and sets out WTO Members’ right to take sanitary and phytosanitary measures necessary for the protection of human, animal or plant life/health. Any such measures must not be inconsistent with the provisions of the SPS Agreement.

The SPS Agreement requires WTO Members to ensure that any sanitary or phytosanitary measure is applied only to the extent necessary to protect human, animal or plant life/health and is science based. Further, such measures must not arbitrarily or unjustifiably discriminate or constitute a disguised restriction on international trade. The SPS Agreement also deals with equivalence which requires the acceptance of an exporting WTO Member’s sanitary and phytosanitary measures where it can be objectively demonstrated that those measures achieve the importing WTO Member’s appropriate level of protection.

The SPS Agreement promotes harmonization by requiring WTO Members to base their sanitary or phytosanitary measures on international standards, guidelines and recommendations where they exist (e.g. the Codex MRLs in the case of residues). An important exception to this requirement is that a WTO Member may maintain measures which result in a higher level of protection than the relevant international standard where that WTO Member has selected a higher appropriate level of protection. Again, such sanitary and phytosanitary measures must not be inconsistent with other provisions of the SPS Agreement some of which are mentioned above. Sanitary or phytosanitary measures which conform to international standards, guidelines or recommendations are presumed to be consistent with the SPS Agreement.

In relation to food safety the SPS Agreement expressly refers to the standards, guidelines and recommendations established by Codex relating to food additives, veterinary drug and pesticide residues, contaminants, methods of analysis and sampling, and codes and guidelines of hygienic practice. Codex standards are an important part of the framework for international trade.

6.3 Appendix 3: The MRL setting and enforcement process in Australia

6.3.1 Setting MRLs

1. A process to set an MRL is undertaken when APVMA receives and assesses an application for registration. The MRL is based on good agricultural and veterinary practice and safety considerations are assessed by the APVMA in accordance with an agreed protocol with FSANZ³.

2. An MRL is determined by the APVMA and when the registration/approval processes are finalised and a registration/permit is granted, permitting the chemical product to be used, the MRL is then published in the MRL standard.

3. Subsequently, APVMA notifies FSANZ of the setting of the MRL and its inclusion in the MRL Standard. The notification is considered as an Application for an amendment to the Code.

4. FSANZ independently validates the aspects of APVMA work that relate to the dietary exposure assessment to ensure that residues do not exceed the relevant health standard established by the Therapeutic Goods Administration, the agency is responsible for characterising hazards to public health posed by veterinary chemicals, pesticides and other environmental chemicals;

5. After the FSANZ statutory processes, including public consultation, ANZFRMC

---

³ A FRSC working group is progressing harmonisation of MRL setting process in Australia.
6. Once incorporated into the Code, these amendments result in permission for the sale of food commodities containing the specified residues of agricultural and veterinary chemicals. If an MRL for a food and an agricultural or veterinary chemical is not listed in the Code, there must be no detectable residues of that chemical in that food.

6.3.2 MRL Implementation & Enforcement

States and Territories enforce compliance with MRLs under State and Territory health/food, primary industries and environmental protection legislation. The APVMA MRL Standard is used in some jurisdictions to regulate the use of agricultural and veterinary chemicals under State and Territory ‘control-of-use’ legislation and to regulate chemical residues in livestock and stock feeds.

The MRLs in the Code apply to the sale of food under State and Territory food/health legislation and the inspection of foods by the Australian Quarantine and Inspection Service (AQIS) under the Commonwealth Government’s Imported Food Program.

MRLs assist in indicating whether an agricultural and veterinary chemical product has been used according to its registered use and if the MRL is exceeded, this indicates a likely misuse of the chemical product.

After registration, considerable resources are used to monitor the use of agricultural and veterinary chemicals. State, Territory and Commonwealth Governments, industry groups, retailers and fresh food markets have programmes to monitor residues in agricultural produce to ensure that the public is not exposed to residue levels above those officially permitted.

4 Currently, the Treaty with New Zealand in relation to the food standards setting system excludes standards for residues of agvet chemicals and New Zealand independently develops standards for these chemicals.
RESPONSE SHEET

POLICY GUIDELINES FOR THE REGULATION OF RESIDUES OF AGRICULTURAL AND VETERINARY CHEMICALS IN FOOD.

Name:
Title:
Organisation:
Address:
Telephone: Fax:
Email:

1. Are the draft policy principles listed on page 10 appropriate and adequate in developing alternative approaches to address the issues associated with the current zero tolerance system?

2. If not, are there other Policy Principles that should be included?

3. Do you have other comments that you think the Ministerial Council should take into account in its deliberations on the Ministerial Policy Guidelines.

Comments should be provided by **Tuesday, 30 May 2006.**

<table>
<thead>
<tr>
<th>Australia</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submissions – Regulation of residues of agvet chemicals in food.</td>
</tr>
<tr>
<td>C/- Food Regulation Secretariat</td>
</tr>
<tr>
<td>PO Box 4</td>
</tr>
<tr>
<td>WODEN ACT 2606</td>
</tr>
<tr>
<td>Or email to the Food Regulation Secretariat</td>
</tr>
<tr>
<td>Or fax to: (02) 6289 5100</td>
</tr>
</tbody>
</table>

Would you like to receive future information about food regulatory issues? If so, please indicate your main areas of interest and detail your e-mail address here.