



Proposals to Amend the New Zealand (Maximum Residue Limits of Agricultural Compounds) Food Standards 2012

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Prepared by the Biosecurity, Food and Animal Welfare Directorate
of the Ministry for Primary Industries

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Executive Summary

Maximum residue limits (MRLs) are the maximum residual level of agricultural compounds allowed in food at the time of harvest or sale. Agricultural compounds include veterinary medicines, fertiliser and pesticides that farmers use to control pests and weeds and treat their animals, amongst other activities.

In New Zealand, MRLs are set out in the New Zealand (Maximum Residue Limits of Agricultural Compounds) Food Standards 2012 (the MRL Standards). The MRL Standards are amended up to three times a year to reflect changes in the use of agricultural compounds. The MRLs are set at a level that allows the compounds to do their job, but as low as possible to minimise risks to public health.

MPI considers possible implications for public health during toxicological and dietary risk assessments for each MRL. The amount of the food (containing the residue) that people are likely to eat is compared with the potential daily exposure to the compound, or to the acceptable daily intake. MRLs are always set well below levels that are known to have any adverse health effects.

This consultation document covers proposed MRLs for four different compounds; three existing insecticides to be used on new crops, and one new antibiotic for use in animals. The changes are supported by scientific evidence and are outlined below:

- the insecticide methoxyfenozide for use on blueberries, nectarines and peaches to control leafrollers. The insecticide is currently used on avocados, kiwifruit and pome fruit (e.g. apples, pears);
- the insecticide spinetoram in mammalian fat, kidney, liver and meat. These MRLs will allow for the use of this insecticide on forage brassicas (e.g. radish, turnips etc for livestock) to control diamond back moth, white butterfly, leaf miner and looper caterpillars. There are currently MRLs for spinetoram for a range of fruits and vegetables;
- the use of insecticide spirotetramat on grapes to control mealy bugs. The insecticide is currently used on kiwifruit, potatoes and tomatoes; and
- tulathromycin (a new active ingredient) in cattle meat, fat, kidney, and liver, and pig meat, fat/skin, kidney and liver, so that it can be used as an antibiotic for cattle and pigs.

Different countries have different environmental conditions and pests, so MRLs vary from country to country. Food imported into New Zealand can either comply with the New Zealand MRL Standard or with the international MRLs set by the Codex Alimentarius Commission.

The Ministry for Primary Industries (MPI) invites public comment on the proposed amendments to the New Zealand (Maximum Residue Limits (MRLs) of Agricultural Compounds) Food Standards 2012 by 5 June 2013.

Submission

The Ministry for Primary Industries (MPI) invites public comment on this discussion document which outlines **proposals to amend the New Zealand (Maximum Residue Limits of Agricultural Compounds) Food Standards 2012**.

The following points may be of assistance in preparing comments:

- Wherever possible, comment should be specific to a particular section in the document. All major sections are numbered and these numbers should be used to link comments to the document.
- Where possible, reasons and data to support comments are requested.
- The use of examples to illustrate particular points is encouraged.
- As a number of copies may be made of your comments, please use good quality type, or make sure the comments are clearly hand-written in black or blue ink.

Please include the following information in your submission:

- the title of the discussion document;
- your name and title (if applicable);
- your organisation's name (if applicable); and
- your address.

Please submit your response by 5:00pm on 5 June 2013. Your comments should be sent to:

MRL Amendments
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Wellington

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1 Introduction

Maximum residue limits (MRLs) are the maximum legal limits for residues of agricultural compounds and veterinary medicines in food for sale in New Zealand. MRLs are primarily a tool for monitoring the use of agricultural compounds in accordance with good agricultural practice (GAP). GAP is not explicitly defined or regulated, but is the generally accepted means for producing safe primary produce in a particular location while taking account of climate, pests or diseases and other environmental factors. MRLs are used to minimise risks to public health by ensuring that chemical residues in food are as low as practicable, without compromising the ability of the chemical to successfully do what is intended.

1.1 BACKGROUND

MRLs are set out in the New Zealand (Maximum Residue Limits of Agricultural Compounds) Food Standards 2012 (the MRL Standards). The MRL Standards are amended a number of times each year to reflect changes in the use of agricultural compounds in the production of food. The MRL Standards are available from the Ministry for Primary Industries (MPI) Foodsafety website at: <http://www.foodsafety.govt.nz/elibrary/industry/register-list-mrl-agricultural-compounds.htm>.

MPI administers the MRL Standards, but the final decision on any changes to the MRL Standards rests with the Minister for Food Safety. Under section 11E and 11L of the Food Act 1981, when amending or issuing the MRL Standards, the Minister must take into account the following:

- The need to protect public health;
- The desirability of avoiding unnecessary restrictions on trade;
- The desirability of maintaining consistency between New Zealand's food standards and those applying internationally;
- New Zealand's obligations under any relevant international treaty, agreement, convention, or protocol, and, in particular, under the Australia-New Zealand Joint Food Standards Agreement; and
- Such other matters as the Minister considers appropriate.

Possible implications for public health are considered during the toxicological and dietary risk assessments by comparing the estimated dietary intake with a Potential Daily Exposure (food) ($PDE_{(food)}$). Where there is no $PDE_{(food)}$, the estimated dietary intake is compared with the Acceptable Daily Intake (ADI). $PDE_{(food)}$ and ADI are described below.

The Environmental Protection Authority (EPA) determines $PDE_{(food)}$ values through toxicological evaluations as part of its responsibility for managing public health under the Hazardous Substances and New Organisms Act 1996 (the HSNO Act). A $PDE_{(food)}$ gives the potential daily exposure a person may be subject to from a substance, via food. MPI uses a $PDE_{(food)}$ where it is available, rather than the internationally-determined ADI, as required by the HSNO Act in New Zealand. The ADI and $PDE_{(food)}$ are largely equivalent, as they are determined using the same set of toxicology data and a very similar scientific process.

An ADI is defined by the World Health Organization (WHO) as: “the daily intake which, during an entire lifetime, appears to be without appreciable risk on the basis of all the known facts at the time”. “Without appreciable risk” has been further defined as: “the practical certainty that injury will not result even after a lifetime of exposure”. ADIs are established by the WHO and Food and Agriculture Organization (FAO) of the United Nations joint expert committees, which are made up of toxicologists and residue specialists. The ADI information

from these joint committees also feeds into the Codex Alimentarius Commission (Codex), which sets international MRLs.

1.2 SUMMARY OF PROPOSED AMENDMENTS

The proposed MRLs have been thoroughly assessed in accordance with international methodologies such as those utilised by the expert committees advising Codex. Information on the technical assessment of each proposal is included in this document (refer section 2) and covers the following:

- rationale;
- chemical information;
- good agricultural practice;
- residues information;
- dietary risk assessment;
- toxicological/public health assessment; and
- International MRLs.

MPI reviewed the estimated dietary exposure assessments for the application of the proposals in this discussion paper. MPI has determined that the residues associated with the proposed MRLs do not present any public health and safety concerns.

New MRLS

MPI proposes to add the following new MRLs to the MRL Standards:

- 0.2 mg/kg for methoxyfenozide when used as an insecticide on nectarines and peaches and 0.8 mg/kg when used as an insecticide on blueberries;
- 0.2 mg/kg for spinetoram in mammalian fat, 0.01 mg/kg in mammalian kidney, 0.01 mg/kg in the mammalian liver and 0.01 mg/kg in mammalian meat when used as an insecticide on forage brassicas;
- 0.02 mg/kg for spirotetramat when used as an insecticide on grapes; and
- 0.1 mg/kg for tulathromycin in cattle meat and fat, 3 mg/kg in cattle offal, 0.5 mg/kg in pig meat, 0.3 mg/kg in pig fat/skin, 3 mg/kg in pig kidney and 2 mg/kg in pig liver when used as an antibiotic in cattle and pigs.

2 Proposals

2.1 PROPOSAL TO SET MRLS FOR METHOXYFENZIDE

It is proposed that an MRL is set for methoxyfenozide when used on blueberries, nectarines and peaches. The current entry for methoxyfenozide in Schedule One of the MRL Standards is:

Compound Common Name	CAS#	Residue to which the maximum residue limit applies	Food	Maximum Permitted Residue Level (mg/kg)
Methoxyfenozide	161050-58-4-97-4	Methoxyfenozide	Avocados	0.1
			Kiwifruit	0.5
			Pome fruit	0.5

The revised entry for methoxyfenozide in Schedule One of the MRL Standards will therefore read:

Compound Common Name	CAS#	Residue to which the maximum residue limit applies	Food	Maximum Permitted Residue Level (mg/kg)
Methoxyfenozide	161050-58-4-97-4	Methoxyfenozide	Avocados	0.1
			Blueberries	0.8
			Kiwifruit	0.5
			Nectarines	0.2
			Peaches	0.2
			Pome fruit	0.5

Amendment Rationale

The proposed MRL represents the expansion of use of a currently registered active ingredient. The proposed MRL will manage the use of methoxyfenozide as an insecticide to control of leafrollers on blueberries and stone fruit and in accordance with the application rates and withholding periods that are proposed as good agricultural practice (GAP) in New Zealand.

Chemical Information

Common name of compound	Methoxyfenozide
Use of compound	Insecticide
Chemical Abstract Services (CAS) Registry number	161050-58-4-97-4
Type of compound	Diacylhydrazine
Administration method	Spray

Good Agricultural Practice

Methoxyfenozide is proposed for use as an insecticide in blueberries, nectarines and peaches. Application is at a rate of 25ml/100 litres for blueberries and 6 gai/100 litres for nectarine and peaches with the following withholding periods:

- Blueberries – 7 days
- Nectarines and Peaches – 14 days

Residues Information

The residue data for the crops supports an MRL of 0.8 mg/kg in blueberries, 0.2 mg/kg in nectarines and peaches when the last treatment is 7 days for blueberries and 14 days for nectarine and peaches prior to harvest. An MRL of 0.8 mg/kg in blueberries and 0.2 mg/kg in nectarines and peaches are proposed to support GAP.

Dietary Risk Assessment

The potential daily exposure via food ($PDE_{(food)}$) is used for the health based guidance value where a value has been set. An appropriate acceptable daily intake (ADI) is used in the absence of a $PDE_{(food)}$. The $PDE_{(food)}$ of 0.08 mg/kg bw/d was considered appropriate for use in the assessment and is consistent with overseas reputable regulatory bodies

The chronic dietary exposure to methoxyfenozide is estimated by the National Estimated Dietary Intake (NEDI) calculation encompassing all registered uses of the chemical and food consumption data based upon the 1997 National Nutrition Survey for adults (New Zealand) and the 1995 National Nutrition Survey (Australia), for children. The NEDI calculation is made in accordance with *Guidelines for predicting dietary intake of pesticide residues (revised)* [World Health Organization, 1997].

Based on the proposed MRLs, the NEDI for methoxyfenozide is less than 0.5% of the $PDE_{(food)}$. It is therefore concluded that the chronic dietary exposure is small and the risk is acceptable.

Toxicological/Public Health Assessment

It has been determined that the use of methoxyfenozide as an insecticide for blueberries, nectarines and peaches according to the GAP specified above, is very unlikely to pose any health risks from consumption of treated produce.

Other International MRLs

Country	Food	Maximum Residue Limit (mg/kg)
Australia	Blueberries	2
	Stonefruits (except plums)	3
CODEX	Blueberries	4
	Stonefruits	2
European Union	Blueberries	4
	Peaches (Nectarines and similar hybrids)	0.3
USA	Blueberries	3
	Stonefruit (Exclude plums, prune fresh)	3

Under clause 6(3)(b) of the MRL Standards imported food may contain residues of agricultural compounds no greater than the MRLs specified for that food in the current editions or supplements of the FAO/WHO Codex Alimentarius Commission publications *Pesticide Residues in Food or Residues of Veterinary Drugs in Foods*.

To meet New Zealand's obligations under the Agreement on the Application of Sanitary and Phytosanitary Measures the proposed MRL will be notified to the World Trade Organization. Any country may choose to comment if they believe the proposed MRL represents a barrier to their trade.

2.2 PROPOSAL TO SET AN MRL FOR SPINETORAM

It is proposed that MRLs are set for spinetoram in mammalian fat, kidney, liver and meat as a result of use on forage brassicas. The current entry for spinetoram in Schedule One of the MRL Standards is:

Compound Common Name	CAS#	Residue to which the maximum residue limit applies	Food	Maximum Permitted Residue Level (mg/kg)
Spinetoram	187166-40-1 + 187166-15-0	<i>Sum of:</i>	Apples	0.05
		XDE-175-J	Pears	0.05
		XDE-175-L	Stonefruits	0.2
		Expressed as:	Vegetable brassicas	0.15
		Spinetoram	Potatoes	0.02(*)
			Tomatoes	0.02(*)

The revised entry for spinetoram in Schedule One of the MRL Standards will therefore read:

Compound Common Name	CAS#	Residue to which the maximum residue limit applies	Food	Maximum Residue Limit (mg/kg)
Spinetoram	187166-40-1 + 187166-15-0	<i>Sum of:</i>	Apples	0.05
		XDE-175-J	Mammalian fat	0.2
		XDE-175-L	Mammalian kidney	0.01(*)
		Expressed as:	Mammalian liver	0.01(*)
		Spinetoram	Mammalian meat	0.01(*)
			Pears	0.05
			Stone fruit	0.2
			Vegetable brassicas	0.15
			Potatoes	0.02(*)
			Tomatoes	0.02(*)

NOTE: (*) indicates that the maximum residue limit has been set at or about the limit of analytical quantification.

Amendment Rationale

The proposed MRLs represent the expansion of use of a currently registered active ingredient. They will manage the use of spinetoram as an insecticide to control diamond back moth, white butterfly, leaf miner and looper caterpillars in forage brassicas in accordance with the application rates and withholding period that is proposed as good agricultural practice (GAP) in New Zealand.

Chemical Information

Common name of compound	Spinetoram (XDE-175-J + XDE-175-L)
Use of compound	Insecticide
Chemical Abstract Services (CAS) Registry number	187166-40-1 + 187166-15-0
Type of compound	Spinosym
Administration method	Spray

Good Agricultural Practice

Spinetoram is proposed for use as an insecticide in forage brassicas at a rate of 18gai per hectare.

Residues Information

The residue data for forage brassicas supports an MRL of 0.2 mg/kg for spinetoram in fat, 0.01 mg/kg in kidney, 0.01 mg/kg in the liver and 0.01 mg/kg in meat when the above withholding periods are adhered to.

Dietary Risk Assessment

The potential daily exposure via food ($PDE_{(food)}$) is used for the health based guidance value where a value has been set. An appropriate acceptable daily intake (ADI) is used in the absence of a $PDE_{(food)}$. The $PDE_{(food)}$ of 0.024 mg/kg bw/d has been set by EPA and is considered appropriate for use in the assessment of spinetoram.

The chronic dietary exposure to spinetoram is estimated by the National Estimated Dietary Intake (NEDI) calculation encompassing all registered uses of the chemical and food consumption data based upon the 1997 National Nutrition Survey for adults (New Zealand) and the 1995 National Nutrition Survey (Australia), for children. The NEDI calculation is made in accordance with *Guidelines for predicting dietary intake of pesticide residues (revised)* [World Health Organization, 1997].

Based on the proposed MRLs, the NEDI for spinetoram is equivalent to less than 1% of the $PDE_{(food)}$. It is therefore concluded that the chronic dietary exposure is small and the risk is acceptable.

Toxicological/Public Health Assessment

It has been determined that the use of spinetoram as an insecticide in forage brassicas according to GAP (specified above), is very unlikely to pose any health risks from consumption of treated produce.

Other International MRLs

Country	Food	Maximum Residue Limit (mg/kg)
Australia	Meat (mammalian (in the fat))	0.05
CODEX	Meat	0.2
	Edible offal	0.01(*)
European Union	Meat	0.2
	Fat free of lean meat	0.01(*)
	Liver	0.01(*)
	Kidney	0.01(*)
Japan	Cattle, Pig muscle	0.01(*)
	Cattle, Pig fat	0.2

NOTE: (*) indicates that the maximum residue limit has been set at or about the limit of analytical quantification.

Under clause 6(3)(b) of the MRL Standards imported food may contain residues of agricultural compounds no greater than the MRLs specified for that food in the current editions or supplements of the FAO/WHO Codex Alimentarius Commission publications *Pesticide Residues in Food or Residues of Veterinary Drugs in Foods*.

To meet New Zealand's obligations under the Agreement on the Application of Sanitary and Phytosanitary Measures the proposed MRL will be notified to the World Trade Organization. Any country may choose to comment if they believe the proposed MRL represents a barrier to their trade

2.3 PROPOSAL TO SET AN MRL FOR SPIROTETRAMAT

It is proposed that an MRL is set for spirotetramat when used on grapes. The current entry for spirotetramat in Schedule One of the MRL Standards is:

Compound Common Name	CAS#	Residue to which the maximum residue limit applies	Food	Maximum Permitted Residue Level (mg/kg)
Spirotetramat	203313-25-1	Sum of: Spirotetramat and its enol metabolite	Kiwifruit	0.1
		Expressed as: Spirotetramat	Potatoes	0.5
			Tomatoes	0.3

The revised entry for spirotetramat in Schedule One of the MRL Standards will therefore read:

Compound Common Name	CAS#	Residue to which the maximum residue limit applies	Food	Maximum Permitted Residue Level (mg/kg)
Spirotetramat	203313-25-1	Sum of: Spirotetramat and its enol metabolite	Kiwifruit	0.1
			Potatoes	0.5
		Expressed as: Spirotetramat	Tomatoes	0.3
			Grapes	0.02(*)

NOTE: (*) indicates that the maximum residue limit has been set at or about the limit of analytical quantification.

Amendment Rationale

The proposed MRLs represent the expansion of use of a currently registered active ingredient. They will manage the use of spirotetramat as an insecticide to control mealy bugs in grapes in accordance with the application rates and withholding period that is proposed as good agricultural practice (GAP) in New Zealand.

Chemical Information

Common name of compound	Spirotetramat
Use of compound	Insecticide
Chemical Abstract Services (CAS) Registry number	203313-25-1
Type of compound	Tetramic acid
Administration method	Spray

Good Agricultural Practice

Spirotetramat is proposed for use as an insecticide for grapes. Application rate is 75gai/ha and be applied prior to flowering.

Residues Information

Residue data for tomatoes supports an MRL of 0.02 mg/kg for spirotetramat when the last treatment is prior to flowering. An MRL of 0.02 mg/kg is therefore proposed to support GAP.

Dietary Risk Assessment

The potential daily exposure via food ($PDE_{(food)}$) is used for the health based guidance value where a value has been set. An appropriate acceptable daily intake (ADI) is used in the absence of a $PDE_{(food)}$. The $PDE_{(food)}$ of 0.004 mg/kg bw/d has been set by EPA and is considered appropriate for use in the assessment of spirotetramat.

The chronic dietary exposure to spirotetramat is estimated by the National Estimated Dietary Intake (NEDI) calculation encompassing all registered uses of the chemical and food

consumption data based upon the 1997 National Nutrition Survey for adults (New Zealand) and the 1995 National Nutrition Survey (Australia), for children. The NEDI calculation is made in accordance with *Guidelines for predicting dietary intake of pesticide residues (revised)* [World Health Organization, 1997].

Based on the proposed MRLs, the NEDI for spirotetramat is equivalent to less than 36% of the PDE_(food). It is therefore concluded that the chronic dietary exposure is small and the risk is acceptable.

Toxicological/Public Health Assessment

It has been determined that the use of spirotetramat as an insecticide for grapes according to the GAP specified above, is very unlikely to pose any health risks from consumption of treated produce.

Other International MRLs

Country	Food	Maximum Residue Limit (mg/kg)
Australia	Grapes	2
CODEX	Grapes	2
European Union	Table Grapes	2
Japan	Grapes	2
USA	Small Fruit vine	1.3

Under clause 6(3)(b) of the MRL Standards imported food may contain residues of agricultural compounds no greater than the MRLs specified for that food in the current editions or supplements of the FAO/WHO Codex Alimentarius Commission publications *Pesticide Residues in Food or Residues of Veterinary Drugs in Foods*.

To meet New Zealand's obligations under the Agreement on the Application of Sanitary and Phytosanitary Measures the proposed MRL will be notified to the World Trade Organization. Any country may choose to comment if they believe the proposed MRL represents a barrier to their trade.

2.4 PROPOSAL TO SET MRLS FOR TULATHROMYCIN

It is proposed that MRLs are set for tulathromycin when used on cattle and pigs. This will be the entry for tulathromycin in Schedule One of the MRL Standards:

Compound Common Name	CAS#	Residue to which the maximum residue limit applies	Food	Maximum Permitted Residue Level (mg/kg)
Tulathromycin	217500-96-4	(2R,3S,4R,5R,8R,10R,11R,12S, 13S,14R)-2-ethyl-3,4,10,13-tetrahydroxy-3,5,8,10,12,14-hexamethyl-11-[[3,4,6trideoxy-3(dimethylamino)-β-Dxylo-hexopyranosyl]oxy]-1-oxa- 6-azacyclopentadecan-15-one expressed as tulathromycin equivalents	Cattle meat	0.1
			Cattle fat	0.1
			Cattle kidney	3
			Cattle liver	3
			Pig meat	0.5
			Pig fat/skin	0.3
			Pig kidney	3
			Pig liver	2

Amendment Rationale

The proposed MRL represents use pattern in New Zealand for a new active ingredient tulathromycin. The proposed MRL will manage the use of tulathromycin as an antibiotic for

cattle and pigs, to the application rates and withholding periods that are proposed as GAP in New Zealand.

Chemical Information

Common name of compound	Tulathromycin
Use of compound	Antibiotic
Chemical Abstract Services (CAS) Registry number	217500-96-4
Type of compound	Macrolide
Administration method	Injection

Good Agricultural Practice

Tulathromycin is used as an antibiotic agent for cattle and pigs. It is to be applied subcutaneously at a dose rate of 2.5mg/kg with the following withholding periods:

- Cattle Meat – 35 days
- Pig Meat – 14 days
- Milk – 35 days

Residues Information

Residue data for cattle and pigs support MRLs of 0.1 mg/kg in cattle meat and fat, 3 mg/kg in cattle offal, 0.5 mg/kg in pig meat, 0.3 mg/kg in pig fat/skin, 3 mg/kg in pig kidney and 2 mg/kg in pig liver at the proposed withholding periods. MRLs of 0.1 mg/kg in cattle meat and fat, 3 mg/kg in cattle offal, 0.5 mg/kg in pig meat, 0.3 mg/kg in pig fat/skin, 3 mg/kg in pig kidney and 2 mg/kg in pig liver are therefore proposed to support GAP.

Dietary Risk Assessment

The potential daily exposure via food ($PDE_{(food)}$) is used for for the health based guidance value where a value has been set. An appropriate acceptable daily intake (ADI) is used in the absence of a $PDE_{(food)}$. MPI considered the ADI of 0.011 mg/kg bw/d was appropriate for use in the assessment and is consistent with overseas reputable regulatory bodies.

The chronic dietary exposure to tulathromycin is estimated by the National Estimated Dietary Intake (NEDI) calculation encompassing all registered uses of the chemical and food consumption data based upon the 1997 National Nutrition Survey for adults (New Zealand) and the 1995 National Nutrition Survey (Australia), for children. The NEDI calculation is made in accordance with *Guidelines for predicting dietary intake of pesticide residues (revised)* [World Health Organization, 1997].

Based on the proposed MRLs, the NEDI for tulathromycin is equivalent to less than 10% of the ADI. It is therefore concluded that the chronic dietary exposure is small and the risk is acceptable.

Toxicological/Public Health Assessment

MPI has determined that the use of tulathromycin as an antibiotic agent for cattle and pigs, according to the GAP specified above, is very unlikely to pose any health risks from consumption of treated animals.

Other International MRLs

Country	Food	Maximum Residue Limit (mg/kg)
Australia	Cattle meat	0.1
	Pig Meat	0.5
	Cattle fat	0.2
	Pig fat/skin	0.3
	Cattle kidney	1
	Pig kidney	3
	Cattle liver	3
	Pig liver	2
European Union	Cattle fat	0.1
	Pig fat/skin	0.1
	Mammalian offal	3
Japan	Cattle meat	0.3
	Pig meat	2
	Cattle fat	0.2
	Pig fat/skin	0.3
	Cattle kidney	3
	Pig kidney	9
	Cattle liver	5
	Pig liver	3
USA	Pig kidney	15
	Cattle liver	5.5

Under clause 6(3)(b) of the MRL Standards imported food may contain residues of agricultural compounds no greater than the MRLs specified for that food in the current editions or supplements of the FAO/WHO Codex Alimentarius Commission publications *Pesticide Residues in Food or Residues of Veterinary Drugs in Foods*.

To meet New Zealand's obligations under the Agreement on the Application of Sanitary and Phytosanitary Measures the proposed MRL will be notified to the World Trade Organization. Any country may choose to comment if they believe the proposed MRL represents a barrier to their trade.