



Project Officer Application A1243  
Food Standards Australia New Zealand  
Level 4  
15 Lancaster Place  
Majura ACT 2609

Dear Sir/Madam

**SUBMISSION - APPLICATION A1243 - HARMONISATION OF MARINE BIOTOXIN STANDARDS FOR BIVALVE SHELLFISH**

Thank you for the opportunity to comment on an application to amend schedule 19 of the Food Standards Code (the Code) with regards to the current biotoxin maximum levels (ML) for bivalve molluscs for human consumption, to align with Codex (Codex Alimentarius Commission).

Under the Imported Food Inspection Scheme (IFIS), bivalve molluscs and bivalve mollusc products are classified as risk food. These products are referred to the IFIS for biotoxin testing for paralytic shellfish poison (PSP) at 0.8mg/kg and domoic acid at 20mg/kg, consistent with the current limits in the Code. From July 2021 to present, there has been 100% compliance for these tests. As the results are reported as being less than 0.8mg/kg, it is uncertain how many consignments tested would have failed with a lower limit of 0.6 mg/kg.

Currently the department is not testing imported bivalve molluscs for the presence of diarrhetic shellfish toxins under the IFIS. Risk advice published by FSANZ in January 2021, states that diarrhetic shellfish toxins do not present a potential medium to high risk to public health.

To align with Codex, the Department of Agriculture, Fisheries and Forestry (the department) supports the proposal to lower the ML for diarrhetic shellfish toxins. As this toxin is not currently tested under the IFIS, this will not impact on importers of shellfish.

For consistency with Codex, the department also supports the proposed change to how paralytic shellfish toxins limits are defined, which will result in the lowering of the ML limit for paralytic shellfish toxins from 0.8 to approximately 0.6 mg/kg.

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As this change will potentially impact importers of bivalves and bivalve mollusc products, the department supports the proposed 12 months commencement. The department will communicate this potential change to importers via its Imported Food Consultative Committee and the issuing of an Imported Food Notice.

Yours faithfully

