New Zealand Food Safety
Haumaru Kai Aotearoa

Proposals to Amend the New Zealand (Maximum Residue Levels for Agricultural Compounds) Food Notice

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by New Zealand Food Safety

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Te Kāwanatanga o Aotearoa
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Manatū Ahu Matua

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1 Request for submissions

New Zealand Food Safety invites public comment on this discussion document, which outlines proposals to amend the New Zealand (Maximum Residue Levels for Agricultural Compounds) Food Notice (Notice).

For **each compound** you are commenting on, please clearly answer the following questions.

Do you agree or disagree with the proposed addition, amendment or deletion?

For compounds listed in Schedule 1, do you agree or disagree with the proposed MRL(s)?

For compounds listed in Schedules 2 or 3, do you agree or disagree with the listing or the conditions?

Please feel free to include with your answers above, any supporting discussion, data or examples that you feel are relevant.

Submissions close at 5 pm on **24 May 2024.** Your comments should be sent to:

MRL Amendments
New Zealand Food Safety
Ministry for Primary Industries
PO Box 2526
Wellington 6140

Email: MaximumResidueLevels@mpi.govt.nz.

Please include your name and address on your submission. If you are making comments on behalf of an organisation, also include your title and the name of the organisation.

Please make sure your comments can be clearly read, as a number of copies of your submission may be made.

The Official Information Act

The Official Information Act 1982 (the OIA) states that information is to be made available unless there are grounds for withholding it. The grounds for withholding information are outlined in the OIA. Submitters may wish to indicate any grounds for withholding information contained in their submission. Reasons for withholding information could include that information is commercially sensitive or that the submitters wish personal information such as names or contact details to be withheld. The Ministry for Primary Industries will take such indications into account when determining whether to release information. Any decision to withhold information requested under the OIA may be reviewed by the Ombudsman.

2 Introduction

Agricultural compounds are natural or synthetic substances used in the direct management of plants and animals, and include all agricultural chemicals (e.g., fungicides, herbicides, and insecticides), veterinary medicines, and other compounds used to maintain plant and animal health and productivity. Growers and farmers use these agricultural compounds to manage disease in animals and crops, protect the food supply, and maximise the quantity and quality of the food they grow.

Agricultural compound use can leave residues in the food harvested from treated crops and animals. To manage these residues, it is important to ensure that only the lowest amount of an agricultural compound is used to consistently achieve its intended purpose. This will leave the smallest amount of residue practicable without compromising the compound's efficacy. The set of principles and methods used to manage that balance is known as good agricultural practice (GAP). These principles apply to the production of safe and good quality horticultural, agricultural, and animal products. Maximum residue levels (MRLs) are then established for each compound/food commodity combination by evaluating the residues left in food commodities as a result of the highest authorised GAP use (the 'critical GAP'). This value is compared against the health-based guidance value before a maximum level of agricultural compound residue allowable in that food commodity is set. How the MRLs are determined, and how they are used once they have been set, are explained in more detail below.

MRLs are the maximum legal levels for residues of agricultural compounds permitted in food for sale in New Zealand. They are established based on domestic uses of a particular compound and are used to monitor GAP compliance in New Zealand while ensuring food safety. Because they are based on New Zealand authorised uses according to domestic GAP, MRLs may differ from those established overseas for a similar use because their GAP may be different. However, as noted below, imported food can also comply with Codex MRLs.

To meet New Zealand's obligations under the Agreement on the Application of Sanitary and Phytosanitary Measures (the SPS Agreement), proposals for new and amended MRLs are notified to the World Trade Organization. Any country may choose to comment if they believe a proposed MRL represents a barrier to their trade.

2.1 Establishing Maximum Residue Levels

2.1.1 Regulatory Structure

MRLs are the maximum legal levels of agricultural compound residues permitted in food for sale in New Zealand and are set out in the Notice. The Notice is updated up to four times a year to reflect changes in the use of agricultural compounds in the production of food. The Notice is available from the Ministry for Primary Industries (MPI) New Zealand Food Safety website at: https://www.mpi.govt.nz/dmsdocument/19550-maximum-residue-levels-for-agricultural-compounds.

New Zealand Food Safety administers the Notice, with the final decision on any changes to the Notice resting with the Director-General of MPI. The Notice is issued under section 405 of the Food Act 2014. When setting or amending MRLs, the Director-General must follow, as far as practicable, international best practice on dietary intake assessment and setting of maximum residue levels. The requirements for the content of the Notice are set out in Part 6 of the Food Regulations 2015 (the Food Regulations), allowing for the setting of MRLs for agricultural compounds as well as specifying compounds to which no MRL applies.

In addition to establishing the requirements for domestically produced foods, Part 6 of the Food Regulations also outlines the residue level compliance requirements for imported foods.

Regulation 144 states that food must not contain residues of agricultural compounds unless the residue level does not exceed:

- the MRLs specified for that food in a notice set under the Food Act 2014 (regulation 144(1)(a)); or
- the default MRL of 0.1 mg/kg (regulation 144(1)(c)); or
- for imported food, the current editions of either the Maximum Residue Limits (MRLs) and Extraneous Maximum Residue Limits (EMRLs) for Pesticides (Codex Pesticides Residues in Food Online Database), or the Maximum Residue Limits for Veterinary Drugs in Food (Codex Veterinary Drug Residue in Food Online Database) (regulation 144(1)(d)).

These provisions allow for New Zealand Food Safety to set MRLs for imported food commodities when such levels are required. As imported food commodities can comply with either a Codex MRL or a MRL established in the Notice, New Zealand's obligations under the SPS Agreement are met.

On the whole, the Food Regulations allow for the management of residues in all foods consumed in New Zealand.

2.1.2 Determining Maximum Residue Levels

The first step in determining MRLs for an agricultural compound is establishing GAP for the use of the compound in the target species or crop. New Zealand Food Safety establishes GAP by evaluating efficacy, crop safety, and animal health and safety for the range of treatments and use patterns approved and proposed for each compound. Once GAP has been established for an agricultural compound, the residues resulting from the highest authorised dose or application rate and use pattern, which is likely to give rise to the highest residues (the 'critical GAP') is then used to determine the MRLs in food commodities from treated crops and animals.

Although the primary function of MRLs is to ensure conformance with established New Zealand GAP, the MRLs also play a role in managing dietary exposure and risks to trade in food commodities. To ensure the MRLs will effectively manage residues related to those risks, a national estimated daily intake or NEDI calculation is conducted to evaluate consumption risk and a review of all international MRLs for the compound/commodity combinations being considered is completed to evaluate trade risk. If it is found that the MRL being considered may pose a food safety or trade risk, the proposed MRL is not progressed.

Where it has been determined that MRLs can be set, those MRLs are proposed for inclusion in the Notice for approved or proposed agricultural compound uses. For veterinary medicines, MRLs may be proposed for animal products from a specific species (e.g., cattle, chicken) or a species group (e.g., mammalian, poultry) depending on the residue and metabolism profile of the agricultural compound being considered. Similarly, for agricultural chemicals, an MRL may be set for an individual crop or crop product (e.g., avocados, wheat grains) or for a crop grouping (e.g., pome fruits). When it has been determined that assigning an MRL to a crop grouping is appropriate, the grouping used aligns with the Codex classifications of foods and animal feeds.

For agricultural chemicals used on a crop from which both food and animal feed commodities are derived, MRLs are proposed for both the food commodities intended for human consumption from the treated crop, and animal commodities for the species or species group to which the feed commodity is fed. If the compound for which the MRLs are set is also used as a veterinary medicine, all approved veterinary and agricultural chemical uses are considered when setting the animal commodity MRLs. If an agricultural chemical is used on a

crop from which only animal feed is harvested (e.g., pasture, fodder crops), only animal commodity MRLs will be proposed.

2.1.3 Estimating Chronic Dietary Exposure

National estimated daily intake

The objective of the estimated chronic dietary exposure is to determine whether residues in food commodities will pose an unacceptable risk to consumers as a result of the authorised use of an agricultural compound according to established GAP. This exposure is estimated by calculating the national estimated daily intake (NEDI) in accordance with the Guidelines for predicting dietary intake of pesticide residues (revised) [World Health Organization, 1997].

The NEDI calculation uses the total residues in food derived from all New Zealand authorised uses of an agricultural compound, including all toxicologically significant residues, and regional dietary consumption data derived from the 1997 National Nutritional Survey for adults and the 1995 National Nutrition Survey of Australia for children. The calculated NEDI is then compared with the health based guidance value (HBGV) associated with the compound; if the total residues derived from all uses of the agricultural compound is estimated to be less than the HBGV, the dietary exposure is unlikely to pose a health risk to consumers.

Health Based Guidance Values

The HBGV used in determining the estimated dietary exposure may be either a Potential Daily Exposure (food) ($PDE_{(food)}$) or an Acceptable Daily Intake (ADI). The ADI and $PDE_{(food)}$ are largely equivalent as they are determined using the same set of toxicology data and through a very similar scientific process. Both values are reported as milligrams of compound per kilogram bodyweight per day (mg/kg bw/d).

A $PDE_{(food)}$ is a value determined by a toxicological evaluation by the New Zealand Environmental Protection Authority (NZ EPA) as part of its responsibility for managing public health under the Hazardous Substances and New Organisms Act 1996. A $PDE_{(food)}$ is the food-specific part of a set of values for different exposure pathways comprising the NZ EPA's assessment of acceptable daily exposure (ADE) for an agricultural compound. It provides the threshold for the potential daily exposure to a substance that a person may be subject to via food.

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.

New Zealand Food Safety uses the $PDE_{(food)}$ set by the NZ EPA as the HBGV for the estimation of dietary exposure when one is available. If there is no $PDE_{(food)}$, the NEDI is compared with an ADI set by the WHO/FAO joint expert committees, the Australian Pesticides and Veterinary Medicines Authority, the European Food Safety Authority, or another regulatory authority. If none of these are available, the HBGV used will be a New Zealand Food Safety-determined ADI.

2.1.4 International MRLs and Trade

Because New Zealand MRLs are based on domestic GAP, they may differ from the MRLs established overseas for the use of the same compound in the same target species or crop if

the GAP used to set those MRLs are different. To ensure the New Zealand MRLs will not unduly impact trade, the MRLs set by Codex and a selection of other international regulatory bodies are reviewed to evaluate trade risk.

For animal commodities, the MRLs set by Australia, Canada, China, Codex, the European Union, Japan, and the United States are commonly reviewed and compared; for horticultural commodities, MRLs set by Codex and Australia are commonly reviewed and compared. Other international MRLs may also be reviewed and compared if there is a particular trade risk to be considered for those regions for any exported commodity.

Where there are relevant international MRLs to be considered in the trade assessment for the proposal, these are included in a table in the "Relevant International MRLs" section of each proposal entry. This table includes all MRLs for the agricultural compound/food commodity combinations for which new or amended New Zealand MRLs are being proposed; international MRLs for other commodities for which New Zealand MRLs already exist are not included. If there are no MRLs set by an international authority for a particular compound/commodity combination, the authority is not listed in the table.

2.1.5 Agricultural Compounds for Which No Maximum Residue Level Applies

Not all agricultural compounds require an MRL to manage their use in crops or animals. This may be because there are no residues present due to the properties of the compound such as rapid elimination from the plant, animal, or their environment, or because there are no food safety or trade risks associated with the residues that are present. Regulation 141 of the Food Regulations allows for the listing of specified compounds that fit these criteria as agricultural chemicals or veterinary medicines for which no MRL applies. These compounds are listed in Schedule 2 and Schedule 3 of the Notice, respectively, and the conditions of listing can be set for a particular use, a particular animal or crop, or general use as an agricultural chemical or veterinary medicine.

Agricultural chemicals and veterinary medicines being considered for listing as compounds for which no MRL applies undergo a similar scientific assessment of their use as that undertaken for MRL assessment. This assessment is done in accordance with international methodologies published by the Organisation for Economic Cooperation and Development (OECD), International Cooperation on Harmonisation of Technical Requirements for Registration of Veterinary Medicinal Products (VICH), or FAO. It includes establishing the GAP use of the compound, the relevant metabolism and residue information, and the potential risks posed to public health and trade. The assessment may also include an assessment of dietary exposure when considered necessary to fully assess the risks.

Where New Zealand Food Safety has determined that an MRL is not required, the compound is proposed for listing in Schedule 2 (for agricultural chemicals) or Schedule 3 (for veterinary medicines) with conditions on their use to ensure the listing applies only to those situations that have been evaluated. If a compound listed in Schedule 2 or 3 is used in a way that does not meet the specified condition, the default MRL of 0.1 mg/kg will apply to food derived from treated plants or animals. Each proposal for inclusion in Schedule 2 or 3 includes a discussion of the rationale behind the considerations for listing, and a discussion of the assessed risks and proposed conditions.

2.2 Summary of Proposed Amendments

The proposed MRLs have been thoroughly assessed in accordance with international methodologies published by the OECD, VICH, or FAO. Information on the technical assessment of each proposal is included in this document (refer section 3) and covers:

- the new or amended entry proposed for inclusion in the Notice;
- the rationale for the new entry or amendment being proposed;
- New Zealand good agricultural practice for the compound and target crop or species;
- the relevant residues information used in determining the proposed MRLs;
- a summary of the dietary risk and public health assessment; and
- the MRLs set by Codex and other authorities that are relevant to the new or amended entry.

Where an existing entry is proposed for revision, new or revised entry content is listed in bold print, and content proposed for removal is identified by a strikethrough.

The MRL compliance and dietary risk assessment residue definitions are included in the residues information section of the proposal. The HBGV used to compare to the NEDI calculation and determine the potential public health risk is included in the dietary risk and public health assessment section of the proposal.

2.2.1 Amendments to Schedule 1: Maximum Residue Levels for Agricultural Compounds

MPI proposes to make the following changes to Schedule 1 of the Notice:

- An amendment to the entries for **brodifacoum**, **bromadiolone**, **flocoumafen**, and **pindone**, to set MRLs at 0.003 mg/kg for pig edible offal (except liver), and 0.004 mg/kg for pig liver;
- New entries for **coumatetralyl**, **difenacoum**, **difethialone**, and **diphacinone**, to set MRLs at 0.003 mg/kg for pig edible offal (except liver), 0.004 mg/kg for pig liver, and 0.001(*) mg/kg for any other food;
- An amendment to the entry for **dieldrin and aldrin**, to remove the 'any other food' MRL.

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

3 PROPOSALS

3.1 Proposal to amend the MRLs for brodifacoum, bromadiolone, flocoumafen, and pindone, and to set MRLs for coumatetralyl, difenacoum, difethialone, and diphacinone

It is proposed that new and revised MRLs are set for the anticoagulant vertebrate toxic agent (VTA) compounds brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone, diphacinone, flocoumafen, and pindone to better support the GAP use of these compounds on or near farms. The proposals will also serve to reinforce the controls on the use of these compounds, which prevent direct exposure of food-producing animals to VTAs.

These changes are being presented as a single proposal since the same rationale for establishing these MRLs and their proposed values apply to all eight compounds. The new and revised entries in Schedule 1 of the Notice will read:

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Brodifacoum	56073-10-0	Brodifacoum	**Pig edible offal (except liver)** **Pig liver** Any **other** food	 **0.003** **0.004** 0.001(*)

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Bromadiolone	28772-56-7	Bromadiolone	**Pig edible offal (except liver)** **Pig liver** Any **other** food	 **0.003** **0.004** 0.001(*)

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Coumatetralyl	**5836-29-3**	**Coumatetralyl**	**Pig edible offal (except liver)** **Pig liver** **Any other food**	 **0.003** **0.004** **0.001(*)**

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Difenacoum	**56073-07-5**	**Difenacoum**	**Pig edible offal (except liver)** **Pig liver** **Any other food**	 **0.003** **0.004** **0.001(*)**

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Difethialone	**104653-34-1**	**Difethialone**	**Pig edible offal (except liver)** **Pig liver** **Any other food**	 **0.003** **0.004** **0.001(*)**

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Diphacinone	**82-66-6**	**Diphacinone**	**Pig edible offal (except liver)** **Pig liver** **Any other food**	 **0.003** **0.004** **0.001(*)**

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Flocoumafen	90035-08-8	Flocoumafen	**Pig edible offal (except liver)** **Pig liver** Any **other** foods	 **0.003** **0.004** 0.001(*)

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Pindone	83-26-1	Pindone	**Pig edible offal (except liver)** **Pig liver** Any **other** food	 **0.003** **0.004** 0.001(*)

3.1.1 Amendment Rationale

The MRLs are being proposed to support the use of VTAs on or near farms for rodent control while ensuring residues in all animal commodities are minimised.

The values proposed are based on a worst-case evaluation of brodifacoum, a second-generation anticoagulant with the greatest potential for persistence in tissues, the lowest HBGV, and the most significant acute toxicity profile of the group. The modes of action for the other anticoagulant compounds are similar to brodifacoum, but they present lower potential for toxicity and a generally shorter persistence profile and elimination half-life. Because of this, and because of the shared GAP across all anticoagulant VTAs, New Zealand Food Safety have proposed identical MRLs for all compounds to ensure secondary exposure to anticoagulant residues are effectively mitigated in all animal commodities.

Because poisoned pest animals can excrete the compounds and their metabolites after exposure, food-producing animals may occasionally be subject to secondary exposure to anticoagulants through contact with pest waste and/or poisoned carcasses. This infrequent and discrete secondary exposure scenario can result in residues in some animals, requiring the application of MRLs in animal commodities to reinforce the requirement that food-producing animals are not exposed to VTAs and to mitigate residue exposure. This is particularly important in pigs given the sector's reliance on grain-based feeds, which is most likely to attract pest animals and lead to the highest potential likelihood of exposure to pest waste or poisoned carcasses.

Anticoagulant VTAs have a high degree of persistence in liver and other offals and have the potential for accumulation in these tissues. The MRLs being proposed take this into account for the species most likely to be exposed to these compounds, while still ensuring residues remain well within what would be expected from a GAP perspective.

3.1.2 Good Agricultural Practice

Anticoagulant VTAs are used in New Zealand to control rodents, possums, and other introduced mammalian pests that pose a serious threat to agricultural hygiene through vector-borne diseases. In farming situations, these compounds are used to control pests near grain stores to prevent feed contamination and loss, and direct human and animal exposure to pests and pest-borne diseases.

GAP for all anticoagulant VTAs is use only in areas that are not accessible by non-target species, and prevention of direct or primary exposure of food-producing species to the compound.

3.1.3 Residue Information and MRL determination

Unlike other agricultural compounds, residue evaluation for anticoagulant VTA exposure must be based on potential exposure pathways and the absorption, distribution, metabolism, and elimination profile of the compounds after exposure. The exposure pathways and kinetics of each compound were reviewed, identifying that brodifacoum presented the greatest amount of biological persistence. As brodifacoum is also one of the most commonly used anticoagulant VTA compounds, assessment of brodifacoum as the model for exposure and residue potential was considered the most prudent approach to risk management.

On evaluation of the exposure modelling and available data for brodifacoum, it was determined that use of brodifacoum according to GAP and all controls should result in residues remaining below 0.004 in pig liver, 0.003 mg/kg in pig offal other than liver, and below the limit of quantification (0.001 mg/kg) in all other animal-derived food commodities. As residues of anticoagulant VTAs are not expected to exceed the levels proposed for brodifacoum, and all eight compounds have the same limit of quantification, the same MRLs are proposed for bromadiolone, coumatetralyl, difenacoum, difethialone, diphacinone, flocoumafen, and pindone. It is noted that the 'any other food' MRL remains unchanged for brodifacoum, bromadiolone, flocoumafen, and pindone for all commodities other than pig liver and other offals.

The residue definitions for MRL compliance and dietary intake will be retained as parent compound for the four anticoagulants with existing entries in the Notice ('brodifacoum', 'bromadiolone', 'flocoumafen', and 'pindone'), and will be set as parent compound for the four new entries ('coumatetralyl', 'difenacoum', 'difethialone', and 'diphacinone').

3.1.4 Dietary Risk Assessment

The HBGVs used in evaluating these compounds were 0.0005 mg/kg bw/d for brodifacoum, 0.002 mg/kg bw/d for bromadiolone, 0.003 mg/kg bw/d for coumatetralyl, 0.0006 mg/kg bw/d for difethialone, and 0.001 mg/kg bw/d for flocoumafen. HBGVs could not be determined for diphacinone, difenacoum, and pindone, but the toxicological analysis of these compounds concluded that they were less toxicologically potent than brodifacoum.

Based on the residue profile expected in food from animals treated with brodifacoum according to GAP and in accordance with all controls, the NEDI is estimated to be less than 2% of the HGBV. As brodifacoum has the lowest HBGV of all eight compounds, this NEDI represents the worst case exposure for all anticoagulant VTAs.

New Zealand Food Safety has therefore determined that when anticoagulant VTAs are used in accordance with GAP, with the restrictions and controls in place on the use of these compounds in farm situations, and applying the proposed MRLs, their use is unlikely to pose any health risks from authorised use.

3.1.5 Relevant International MRLs

- **Brodifacoum**

Authority	Food	Maximum Residue Level (mg/kg)
European Union	All food commodities	0.01
Japan	Cattle, pig, and other terrestrial mammals, muscle	0.0005
	Cattle, pig, and other terrestrial mammals, liver	0.0005
	Cattle, pig, and other terrestrial mammals, kidney	0.0005
	Cattle, Pig, and other terrestrial mammals, edible offal	0.0005
	All other farmed terrestrial mammal commodities	0.001

- **Bromadiolone**

Authority	Food	Maximum Residue Level (mg/kg)
European Union	All commodities from swine and other farmed terrestrial mammals and poultry	0.01

- **Coumatetralyl**

Authority	Food	Maximum Residue Level (mg/kg)
European Union	All food commodities	0.01

- **Difenacoum**

Authority	Food	Maximum Residue Level (mg/kg)
European Union (from 12/08/24)	All commodities from swine and other farmed terrestrial mammals and poultry	0.01

- **Difethialone**

Authority	Food	Maximum Residue Level (mg/kg)
Australia	Listed in the Agricultural and Veterinary Chemicals (MRL Standard for Residues of Chemical Products) Instrument 2023 as a compound for which no MRL applies when used in baits as a rodenticide in situations where contact with crops, food products, or soil in which crops are grown will not occur.	
European Union	All food commodities	0.01

- **Diphacinone**

  Listed in the Agricultural and Veterinary Chemicals (MRL Standard for Residues of Chemical Products) Instrument 2023 as a compound for which no MRL applies when used in baits as a rodenticide in situations where contact with crops, food products, or soil in which crops are grown will not occur.

- **Flocoumafen**

Authority	Food	Maximum Residue Level (mg/kg)
Australia	Listed in the Agricultural and Veterinary Chemicals (MRL Standard for Residues of Chemical Products) Instrument 2023 as a compound for which no MRL applies when used in baits as a rodenticide in situations where contact with crops, food products, or soil in which crops are grown will not occur.	
European Union	All food commodities	0.01

- **Pindone**

Authority	Food	Maximum Residue Level (mg/kg)
Japan	All farmed terrestrial mammal and poultry commodities	0.001

3.2 Proposal to amend the Notice entry for dieldrin and aldrin

It is proposed that the following entry is amended in Schedule 1 of the Notice:

Compound Common Name	CAS#	Residue to which the maximum residue level applies	Food	Maximum Residue Level (mg/kg)
Dieldrin and aldrin	60-57-1 and 309-00-2	Sum of: HHDN and HEOD (MRLs cover dieldrin and aldrin singly or in combination)	Cereal grains Citrus fruits Fats (except milk fats) Milk fats ~~**Any other food**~~	0.02 0.05 0.2 0.15 ~~**0.1**~~

3.2.1 Amendment Rationale

Dieldrin and aldrin are banned organochlorine insecticidal compounds and persistent organic pollutants for which soil residues continue to be mitigated through the application of MRLs. The deletion of the 'any other food' MRL is being proposed because all agricultural compound residues detectable in food commodities will be subject to regulatory limits at the 0.1 mg/kg default MRL or lower depending on the commodity, making a specific 'any other food' listing redundant. All other MRLs will be retained as previously set.