



Proposed changes to maximum levels (MLs) for contaminants in fish, crustacean, molluscs and other aquatic animals – based on unofficial translations

Limits of contaminants are on the usual edible part of the food, unless otherwise specified.

Arsenic (As) – Inorganic

Food Item	China (GB2762-2017)	China (GB2762-XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Aquatic animals (excluding fish and fish products)	0.5 mg/kg	0.5 mg/kg	2.0 mg/kg (Crustacea) 1.0 mg/kg (Molluscs)	-
Fish and fish products	0.1 mg/kg	0.1 mg/kg	2.0 mg/kg	-

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Cadmium (Cd)

Food Item	China (GB2762- 2017)	China (GB2762- XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Fish (fresh/frozen)	0.1 mg/kg	0.1 mg/kg	-	-
Crustaceans (fresh/frozen)	0.5 mg/kg	-	-	-
Crustaceans (fresh/frozen; excluding sea crab and shrimps)	-	0.5 mg/kg	-	-
Crustaceans (fresh/frozen; sea crab and Mantis shrimp)	-	1.0 mg/kg (muscle tissue only)	-	-
Bivalve molluscs (fresh/frozen)	2.0 mg/kg (eviscerated)	2.0 mg/kg (eviscerated)	2.0 mg/kg (Molluscs - excluding dredge/bluff oysters and queens scallops)	2.0 mg/kg; excluding oysters and scallops
Gastropods (fresh/frozen)	2.0 mg/kg (eviscerated)	2.0 mg/kg (eviscerated)	-	-
Cephalopods (fresh/frozen)	2.0 mg/kg (eviscerated)	2.0 mg/kg (eviscerated)	-	2.0 mg/kg without viscera
Echinoderms (fresh/frozen)	2.0 mg/kg (eviscerated)	2.0 mg/kg (eviscerated)	-	-
Canned fish (excluding canned anchovies, sailfish)	0.2 mg/kg	0.2 mg/kg	-	-
Canned anchovies and sailfish	0.3 mg/kg	0.3 mg/kg	-	-
Other fish products (excluding anchovies, sailfish)	0.1 mg/kg	0.1 mg/kg	-	-
Other fish products (Anchovies and sailfish)	0.3 mg/kg	0.3 mg/kg	-	-

Chromium (Cr)

Food Item	China (GB2762- 2017)	China (GB2762- XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Aquatic animals and their products	2.0 mg/kg	2.0 mg/kg	-	-

Lead (Pb)

Food Item	China (GB2762-2017)	China (GB2762-XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Fresh, frozen aquatic animals (excluding fish crustaceans, bivalves)	1.0 mg/kg (Viscera removed)	1.0 mg/kg (Viscera removed)	-	-
Fish (fresh/frozen)	0.5 mg/kg	0.5 mg/kg	0.5 mg/kg	0.3 mg/kg
Crustaceans (fresh/frozen)	0.5 mg/kg	0.5 mg/kg	-	-
Bivalve molluscs (fresh/frozen)	1.5 mg/kg	1.5 mg/kg	2.0 mg/kg (Molluscs)	-
Aquatic products (excluding jellyfish products)	1.0 mg/kg	-	-	-
Aquatic products (excluding fish and jellyfish products)	-	1.0 mg/kg	-	-
Aquatic products (fish products)	-	0.5 mg/kg	-	-
Aquatic products (Jellyfish products)	2.0 mg/kg	2.0 mg.kg	-	-

Mercury (Hg) - Expressed in methylmercury

Food Item	China (GB2762-2017)	China (GB2762-XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Aquatic animals and their products (excluding carnivorous fish and their products)	0.5 mg/kg	0.5 mg/kg	-	-
Aquatic animals and their products (Carnivorous fish and their products)	1.0 mg/kg	-	-	-
Aquatic animals and their products (Carnivorous fish and their products; excluding tuna, snapper, marlin, shark)	-	1.0 mg/kg	-	-
Tuna and its products	-	1.2 mg/kg	-	1.2 mg/kg
Alfonsino and its products	-	1.5 mg/kg	-	1.5 mg/kg
Marlin and its products	-	1.7 mg/kg	-	1.7 mg/kg
Shark and its products	-	1.6 mg/kg	-	1.6 mg.kg

Mercury (Hg) - Expressed in total mercury

Food Item	China (GB2762- 2017)	China (GB2762- XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Aquatic animals	-	-	See below	-

Table 1 Mercury limits in FSANZ – Schedule 19

S19—7 Mean and maximum levels of mercury in fish, crustacea and molluscs				
(1) For subsection 1.4.1—3(2), the following table applies:				
<i>For:</i>	<i>if:</i>	<i>the mean level of mercury in sample units must be no greater than:</i>	<i>the maximum level of mercury in any sample unit must be no greater than:</i>	
gemfish, billfish (including marlin), southern bluefin tuna, barramundi, ling, orange roughy, rays and all species of shark;	(a) both of the following are satisfied:	1.0 mg/kg	1.5 mg/kg	
	(i) 10 or more sample units are available;			
	(ii) the concentration of mercury in any sample unit is greater than 1.0 mg/kg;			
	(b) 5 sample units are available:	1.0 mg/kg	(no level set)	
	(c) there are insufficient samples to analyse in accordance with subsection S19—7(2):		1.0 mg/kg	
other fish, fish products, crustacea and molluscs;	(a) both of the following are satisfied:	0.5 mg/kg	1.5 mg/kg	
	(i) 10 or more sample units are available;			
	(ii) the concentration of mercury in any sample unit is greater than 1.0 mg/kg;			
	(b) 5 sample units are available:	0.5 mg/kg	(no level set)	
	(c) there are insufficient samples to analyse in accordance with subsection S19—7(2):		1.0 mg/kg	

Tin (Sn)

Food Item	China (GB2762- 2017)	China (GB2762- XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Canned foods	250 mg/kg	250 mg/kg	250 mg/kg	250 mg/kg

Benzo[a]pyrene (PAH)

Food Item	China (GB2762-2017)	China (GB2762-XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Aquatic animals and their products (smoked/roasted))	5.0 mg/kg	5.0 mg/kg	-	-

N-Nitrosodimethylamine

Food Item	China (GB2762-2017)	China (GB2762-XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Aquatic animals and their products (excluding canned aquatic products)	4.0 mg/kg	4.0 mg/kg	-	-
Aquatic animals and their products (dried aquatic products)	4.0 mg/kg	4.0 mg/kg	-	-

Polychlorinated biphenyl (total of PCB28, PCB52, PCB101, PCB118, PCB138, PCB153, PCB180)

Food Item	China (GB2762-2017)	China (GB2762-XXXX)	FSANZ (Portion as ordinarily consumed)	Codex
Aquatic animals and their products	0.5 mg/kg	20 µg/kg	-	-
Fish	-	-	0.5 mg/kg (total PCBs)	-
Aquatic animal fats	-	200 µg/kg	-	-

Changes to the limits of pathogenic bacteria in pre-packaged foods in fish, crustacean, molluscs and other aquatic animals – based on unofficial translations

Food Item	China (GB29921-2013)				China (GB29921-XXXX)			
	n	c	m	M	n	c	m	M
<i>Salmonella</i>	5	0	0	-	5	0	0	-
<i>Vibrio parahaemolyticus</i> (RTE only)	5	1	100 MPN/g	1000 MPN/g	5	1	100 MPN/g	1000 MPN/g
<i>Staphylococcus aureus</i>	5	1	100 CFU/g	1000 CFU/g	-	-	-	-
<i>Listeria monocytogenes</i> (RTE only)	-	-	-	-	5	0	100 CFU/g	-

FSANZ - Current microbiological limits in Food (Standard 1.6.1 and Schedule 27)

Food/microorganism	n	c	m	M
Cooked crustacea				
Coagulase-positive staphylococci	5	2	10 ² /g	10 ³ /g
<i>Salmonella</i>	5	0	not detected in 25 g	
SPC	5	2	10 ⁵ /g	10 ⁶ /g
Raw crustacea				
Coagulase-positive staphylococci	5	2	10 ² /g	10 ³ /g
<i>Salmonella</i>	5	0	not detected in 25 g	
SPC	5	2	5x10 ⁵ /g	5x10 ⁶ /g
Bivalve molluscs, other than scallops				
<i>Escherichia coli</i>	5	1	2.3/g	7/g
Ready-to-eat food in which growth of <i>Listeria monocytogenes</i> can occur				
<i>Listeria monocytogenes</i>	5	0	not detected in 25 g	
Ready-to-eat food in which growth of <i>Listeria monocytogenes</i> will not occur				
<i>Listeria monocytogenes</i>	5	0	10 ² cfu/g	