CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Items 3, 4, 5, 6, 7, 8, 9, 10 and 11 **CRD11**

June 2021

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

25th Session
(Virtual)
12-16 and 20 July 2021

Comments submitted by Uganda

Agenda Item 3.1: Matters of interest arising from FAO/WHO including JECFA

Uganda takes note of the information provided in CX/RVDF 21/25/3 and especially the report from JECFA 88.

Agenda Item 3.2: Matters of interest arising from FAO/WHO on feed safety including the Joint FAO/WHO Expert Meeting on Carry-over in feed and transfer from feed to food of unavoidable and unintended residues of approved veterinary drugs

Uganda appreciates and takes note of the report of the Joint FAO/WHO Expert Meeting on Carry-over in feed and transfer from feed to food of unavoidable and unintended residues of approved veterinary drugs.

Uganda supports the recommendations made that are within the scope of the Codex Alimentarius including revision of the Codex Code of Practice on Good Animal feeding to provide practical guidance addressing the potential for carryover of veterinary drug in feed and establishment of an action level for veterinary drug residues in food for cases where carryover is unavoidable even if the Codex Code of Practice on Good Animal Feeding, Good Manufacturing Practice (GMP), and Hazard Analysis Critical Control Point (HAACP) are followed.

Agenda Item 3.3: Matters of interest arising from the Joint FAO/IAEA Centre

The Joint FAO/IAEA division is commended for its initiatives and collaboration with Uganda and other African member states in development of laboratory capacity for analysis of veterinary drug and pesticide residues.

Uganda encourages other African countries who have not yet benefited from these programs to apply and benefit from the available projects.

Agenda Item 4: Matters of interest arising from OIE, including VICH

Uganda commends OIE and VICH for their contribution in developing human capacity in Africa.

As a member of the VICH Outreach Forum (VOF), Uganda has benefited from the trainings, breakout sessions and in-meeting open discussions, and also makes reference to the VICH guidelines relevant to Codex work during assessment of veterinary medicinal products prior to issuance of marketing authorizations.

Agenda item 5: Maximum residue limit for flumethrin (honey) at Step 7

Uganda supports the proposal of CCRDVF24, and as adopted by CAC41 that – "An MRL is "unnecessary" for Flumethrin in Honey. We recommend that CCRVDF25 goes on to forward the same proposal to the 44th Codex Alimentarius Commission (CAC44) for adoption at Step 8.

Justification: Residue levels resulting from the use of the substance as per the available data do not provide any risk to human health when flumethrin is used in accordance to Good Veterinary Practices (GVP).

Agenda item 6.1: Maximum residue limits for diflubenzuron (salmon - muscle plus skin in natural proportion); halquinol (in swine - muscle, skin plus fat, liver and kidney); ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle) at Step 4

Diflubenzuron (salmon - muscle plus skin in natural proportion)

Uganda supports the advancement of MRL for diflubenzuron (salmon - muscle plus skin in natural proportion) to step 5/8 on account of 88th JECFA recommendation.

Justification: The drug has low acute oral toxicity and JECFA recommended MRL of 10 ug/kg in muscle plus skin.

Halquinol (in swine - muscle, skin plus fat, liver and kidney

Uganda supports the advancement of the MRL for this compound to step 5.

Justification: Given that this compound is significantly used in other parts of the world in swine and poultry and products from these species are traded between different countries, it is prudent to have an MRL established.

Ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle)

Uganda is in support of the advancement of the MRL for Ivermectin to step 5 to allow for another round of comments to be considered by the Committee.

Justification: This compound is widely used in Uganda and other African countries against external and internal parasites of livestock, as well in humans.

Agenda item 7: Discussion paper on extrapolation of maximum residue limits to one or more species (including a pilot on extrapolation on MRLs identified in Part D of the Priority List – REP18/RVDF, App. VI)

Uganda thanks the Chair and Co-chairs of the EWG for the work undertaken in developing the discussion paper on extrapolation of MRLs.

Uganda supports the proposed approach for extrapolation of MRL and the proposed MRLs for ruminants and bony fish presented as the pilot on extrapolation of MRLs for drugs identified in the priority list Part D using the proposed approach.

The proposal is specifically aimed at those situations where species-specific data for the concerned species are not available.

Justification: Metabolism in the concerned species will be similar to that in the reference species. The uncertainty that may exist with regard to the similarity of metabolism between the reference and concerned species even when they are related species, has been addressed in Section II of Appendix I of the discussion paper (**Specific criteria for extrapolation**).

Agenda item 8: Discussion paper on the development of a harmonized definition for edible tissues of animal origin (including edible offal) (coordination between the Codex Committee on Pesticide Residues and the Codex Committee on Residues of Veterinary Drugs in Foods)

Uganda thanks the Chair and Co -chairs of the EWG for the work undertaken in developing the discussion paper for a harmonized definition for edible tissues of animal origin (including edible offal).

Uganda supports adoption of the proposed definition for edible offal as “Those parts of an animal, apart from the skeletal muscle and fat, that are considered fit for human consumption”.

Uganda further supports the recommendations of the EWG as outlined in the report.

Justification: The harmonized definition of edible offal and other tissues allows for consistency and facilitation of MRLs for dual compounds.

Agenda item 9: Discussion paper on advantages and disadvantages of a parallel approach to compound evaluation

Uganda is in support of the proposed process as described in paragraphs 7 – 12. However, this should be involving and CCRVDF should wait for the outcome of the pilot program with Selamectin before making final decisions and conclusions about the proposed parallel approach.

Justification: There is need to know the progress of the piloting in relation to evaluation by both the national authorities and JECFA.

Agenda item 10: Database on countries' needs for MRLs

Uganda is in support of the recommendations as stated in the document (CX/RVDF20/25/11).

Justification: The recommendations provide flexibility for member countries to submit their needs for MRLs. Uganda participated in identifying substances highlighted in the database as high priority compounds, and therefore suitable candidates for JECFA evaluation. Some of these drugs especially those used in the treatment of tropical diseases are old compounds, therefore need to be re-evaluated by JECFA.

Agenda item 11: Priority list of veterinary drugs requiring evaluation or re-evaluation by JECFA

Uganda is in agreement with the priority list developed by the Committee.

Justification: Uganda is building capacity to generate relevant data/information for submission to JECFA.