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 5, 6, 8 and 9 **CRD17**

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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 the African Union

Agenda Item 5: Maximum residue limit for flumethrin (honey) at Step 7 (REP18/RVDF-App. IV)

Position: African Union supports adoption of the MRL of flumethrin at Step 8.

Rationale: During the 24th CCRVDF (2018) meeting, JECFA Secretariat clarified that when flumethrin is used according to Good Veterinary Practices (GVP), the amount of residue that could be expected in honey is at or below the limit of quantification of currently available analytical methods. Moreover, is there was very little risk of movement of residues from the wax to honey due to the fact that flumethrin is highly lipophilic (REP18/RVDF, paras. 65-73). Hence residues resulting from the use of this substance as an insecticide in accordance with GVP are unlikely to pose a risk to human health.

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 (CL 2020/17-RVDF)

i) For diflubenzuron (salmon - muscle plus skin in natural proportion)

Position: African Union supports advancement of MRL of 10 ug/kg in muscle and skin for diflubenzuron (salmon - muscle plus skin in natural proportion) to step 5/8

Rationale: The drug has low acute oral toxicity based on the 88th JECFA recommendation and is unlikely to result in consumer safety concerns.

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

Position: African Union notes the proposed MRL for ivermectin in sheeps, pigs and goats and would like to express concern about the significant difference in MRLs recommended in sheep and goats as compared to cattle. In 2017 CAC adopted MRL for ivermectin in cattle (muscle 30 µg/kg, liver 800 µg/kg, Kidney 100 µg/kg and fat 400 µg/kg). The proposed MRL for ivermectin in Sheep, pig and goat are substantially lower (muscle 10 µg/kg, Liver 15 µg/kg, kidney 15 µg/kg and fat 20 µg/kg) than the Codex adopted 2017 MRL for cattle. African Union notes that whilst these MRLs do not raise safety concerns, potential difficulties in implementation of these MRLs could arise due to possibility of exclusion of available Good Practices in the use of veterinary drugs. Ivermectin is widely used in African countries against external and internal parasites of livestock and humans. African Union will therefore welcome further discussions on this matter in CCRVDF25 with the view of establishing MRLs that correspond with available GVPs.

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) CX/RVDF 21/25/9

Position: African Union commends the chair and co-chairs of the EWG for the good work undertaken in developing the discussion paper for a harmonized definition for edible tissues of animal origin (including edible offal). This work is of particular interest to Africa where edible offal are a major trading commodity. The adoption of the recommendations of the EWG by CCRVDF25 will facilitate ease of trade in edible offal, and ensure that definitions used by CCRVDF and CCPR are harmonized. On this basis, African Union 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"*** and welcomes suggestions from Members and Observers to improve the definition.

Agenda Item 9: Discussion paper on advantages and disadvantages of a parallel approach to compound evaluation CX/RVDF 21/25/10

General Comments: African Union commends the chair and co-chairs of the EWG for leading work on the discussion paper on advantages and disadvantages of a parallel approach to compound evaluation. Africa Union supports the parallel review of a new veterinary drug as a complement to the current process to assess new compounds by JECFA for the establishment of Codex MRLs by CCRVDF. In our opinion, the proposed process provides significant benefits as stated in para 13 to para 17 of the discussion paper on this basis AU considers the overall format and content of the proposed procedure is acceptable.

Specific comments on:

i) Principles: African Union has no additional proposals to the principles and the text as we consider these principles to be sufficient to guarantee the integrity of the process.

ii) Procedure: On the issue of procedure, African Union takes note of the phases outlined in the procedures and would wish to provide the following comments:

Phase1: Identification of a candidate: African Union proposes amendment to the text by deleting the word *'.some or all of…'* in the last sentence of paragraph 1 to read…... ***A proposed veterinary drug shall meet the following criteria:***

Rationale: The candidate (veterinary drug) should not be exempted from any of the requirements as provided for in the criteria.

Phase 2 Submission: AU proposes amendment to the text to read as follows …. ***A product is submitted or is expected to be submitted to a national regulatory authority.*** ~~, most likely in one of the larger markets (in practice, most veterinary products are first submitted for review in the U.S. or in Europe).~~ ***At the subsequen****t* ~~*following*~~ ***CCRVDF meeting, the product would be submitted by the Codex Member who received the product application or is expected to receive the application by a certain date for inclusion on the priority list at CCRVDF (Step 1).***

Rationale: The specific reference to markets is limiting, prescriptive and excludes other emerging markets