

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 3, 4, 6(a), 6(b), 6(c), 7, 8(a), 8(b), 8(c)

RVDF/22 CRD/19

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS
Twenty-second Session
San José, Costa Rica, 27 April – 1 May 2015
COMMENTS OF INDONESIA

Agenda item 3 - Matters referred by the Codex Alimentarius Commission and other Codex Committees and Task Forces.

Codex Strategic Plan 2014 – 2019

1. Indonesia supports the Codex Strategic Plan 2014-2019 and proposes to insert “special differential treatment” for developing countries in section 3. Facilitate the effective participation of all Codex Members strategic plan.
2. Indonesia supports the need for monitoring of the Strategic Plan 2014 - 2019 implementation carried out by Codex to ensure its effectiveness. Regarding the Strategic Goal 1. Establish international food standards that address current and emerging food issues, specifically for activity under 1.1.1: Consistently apply decision making and priority setting criteria across Committees to ensure that the standards and work areas of highest priority are progressed in a timely manner, Indonesia would like to share his concern regarding the Priority setting criteria on the international standard for veterinary drugs MRLs.

Indonesia realizes that the preparation of the draft Codex standards on MRLs for veterinary drugs in livestock and aquaculture products should be based on technical studies carried out pursuant to the protocol established by JECFA. Somehow, in fact Indonesia has not been able to participate actively in the establishment of standards based on technical studies to address the current and emerging issues. Since Indonesia still has a limited capability to perform the required scientific studies (supervised residue trials) for the MRLs establishment, then we need capacity building for these specific technical criteria. In regard to this, Indonesia proposed that the monitoring on the implementation of the Codex Strategic Plan 2014 - 2019 by Codex, should reveal or underline whether capacity building, especially for developing countries are also made to support the fulfillment of the strategic goal 1 above.

3. Indonesia supports section 4.2: *Enhance capacity to arrive at consensus in standards setting process in Codex Strategic Planning 2014-2019.*

Agenda item 4 Matters arising from FAO/WHO and from the 78th Meeting of the Joint FAO/WHO Expert Committee on Food Additives (JECFA)

Collection and collation of individual food consumption data in ASEAN countries through EU Codex Trust Fund.

Indonesia strongly supports the initiative of the FAO and WHO on Collection and collation of individual food consumption data in ASEAN countries through EU Codex Trust Fund to resolve the issue on sparse and heterogeneous data in the region as well as further harmonized and input of existing data in another ASEAN countries into the FAO/WHO Global Individual Food data Tool Consumption. In this regards, Indonesia would like to seek clarification on the progress of this project, since Indonesia is very keen to take part in the activity and sharing our national data to be included. And for the benefit of Indonesia in ensuring food safety, we hope that we may be able to directly access to the final results of this activity in the FAO/WHO Global Individual Food consumption data.

Maximum Residues Limits (MRLs) and Risk Management Recommendations (RMRs) for Residues of Veterinary Drugs in Foods

Agenda Item 6 (a) Draft MRLs for Monepantel (at Step 7)

Regarding the Maximum Residues Limits (MRLs) for Monepantel, Indonesia would like to keep its position as in at step 6 as follows:

Monepantel active ingredient is not registered in Indonesia for all products including in sheep. Nevertheless, given that the use of the active ingredient in the production of food of animal origin in several countries, Indonesia supports the establishment of MRLs for monepantel and will wait for the outcome of the JECFA evaluation in light of the information provided by the Committee.

Agenda Item 6 (b) Proposed draft MRLs for Derquantel (at Step 4)

Indonesia notes that the 20th CCRVDF had agreed to hold the proposed draft MRLs at Step 4 and to include derquantel in the priority list with a request to: (i) review the ADI in light of possible different interpretation of the toxicological database; (ii) review the calculation of the marker to total radiolabeled residue; and (iii) revise the recommended MRLs if appropriate and the 21st CCRVDF noted that derquantel would be considered in the 78th JECFA.

Derquantel active ingredient is not registered in Indonesia for all products including in sheep. Nevertheless, given that the use of the active ingredient in the production of food of animal origin in several countries, Indonesia supports the establishment of MRLs for derquantel and will wait for the outcome of the JECFA evaluation in light of the information provided by the Committee.

Agenda Item 6(c) Proposed Draft MRLs for derquantel, emamectin benzoate, ivermectin, lasalocid sodium and monepantel (at step 3)

Indonesia supports the establishment of MRLs for Ivermectin in cattle (muscle) as 4µg/kg and MRLs emamectin benzoate in salmon and trout (muscle and fillet) as 100 µg/kg.

Agenda Item 7 Draft Provision on establishment of MRLs for Honey (for inclusion on the Risk Analysis Principles applied by the CCRVDF)

Indonesia supports the Draft Provision on establishment of MRLs for Honey (for inclusion on the Risk Analysis Principles applied by the CCRVDF).

Agenda Item 8 (a) Draft priority list of veterinary drugs requiring evaluation or re-evaluation by JECFA (Report of the EWG on Priority)

Indonesia supports the Draft priority list of veterinary drugs requiring evaluation or re-evaluation by JECFA.

Agenda Item 8 (b) Alternative approach to move compounds from the database on countries' need for MRLs to the JECFA Priority List (Report of the EWG on Countries' need for MRLs)

Indonesia supports the eWG on Countries' need for MRLs recommendations and interests in participation on global survey. Indonesia proposes to be involved in the eWG.

Agenda Item 8 (c) Database on countries' needs for MRLs

Indonesia supports and would like to submit the following information in the Table below to included in the **Database on Countries' Needs for MRLs**:

Database of Fish Medicine of Potential Interest to Indonesia

Name	Requesting country	Species	Tissues	Good Practice in the Use of Veterinary Drugs (GPVD)	Existing Data & Source	Manufacturer	JECFA evaluation	Codex MRLs	Member country's MRLs	Comments
1. Enrofloxacin	Indonesia	a. Fish : Nile Tilapia, Milkfish, Walking Cat fish, gouramy, common carp, barramundi, grouper	Muscle	GPVD (ex:dosis, withdrawal time, dll)	<ul style="list-style-type: none"> Minister of Marine Affairs and Fisheries of Indonesia Regulation Number 52/KEPMEN-KP/2014 on Fish Medicine Classification Registered Director General of Aquaculture Decree, Ministry of Marine Affairs and Fisheries of Indonesia Number 56/KEP-DJPB/2014 on Maximum Residue Limits on Fish Products 		48th JECFA, 1997; Full ADI	No Codex MRLs	Indonesia	Indonesia exports to some countries
2. Tetracyclin 3. Oxytetracyclin	Indonesia	a. Fish : Nile Tilapia, Milkfish Walking Cat fish, gouramy, common carp, barramundi, grouper	Muscle	GPVD (ex:dosis, withdrawal time, dll)	<ul style="list-style-type: none"> Registered Minister of Marine Affairs and Fisheries of Indonesia Regulation Number 52/KEPMEN-KP/2014 on Fish Medicine Classification Director General of Aquaculture Decree, Ministry of Marine Affairs and Fisheries of Indonesia Number 56/KEP-DJPB/2014 on 		Tetracyclin: 50th JECFA1998; Full ADI. Oxytetracyclin: 50th JECFA, 1998; 58th JECFA, 2002; Full ADI	No Codex MRLs	Indonesia	Indonesia exports to some countries

Name	Requesting country	Species	Tissues	Good Practice in the Use of Veterinary Drugs (GPVD)	Existing Data & Source	Manufacturer	JECFA evaluation	Codex MRLs	Member country's MRLs	Comments
					Maximum Residue Limits on Fish Products					
4 . Erythromycin	Indonesia	a. Fish : Nile Tilapia, Milkfish Walking Cat fish, gouramy, common carp, barramundi, grouper	Muscle	No GPVD	<ul style="list-style-type: none"> Registered Minister of Marine Affairs and Fisheries of Indonesia Regulation Number 52/KEPMEN-KP/2014 on Aquaculture Drugs Classification 		66th JECFA, 2006; Full ADI	No Codex MRLs	Indonesia	Indonesia exports to some countries
5. Chlortetracycline		a. Fish : Nile Tilapia, Milkfish Walking Cat fish, gouramy, common carp, barramundi, grouper	Muscle	GPVD (ex:dosis, withdrawal time, dll)	<ul style="list-style-type: none"> Not Registered Minister of Marine Affairs and Fisheries of Indonesia Regulation Number 52/KEPMEN-KP/2014 on Aquaculture Drugs Classification Director General of Aquaculture Decree, Ministry of Marine Affairs and Fisheries of Indonesia Number 56/KEP-DJPB/2014 on Maximum Residue Limits on Fish Products 		51st JECFA, 1998; Full ADI	No Codex MRLs		