

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items, 2, 3, 4, 6.1, 7, 8, 10, 11

CRD 7

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Twenty-fourth Session

Comments Submitted by: African Union

AGENDA ITEM 2: MATTERS REFERRED BY THE CODEX ALIMENTARIUS COMMISSION AND OTHER SUBSIDIARY BODIES (CX/RVDF 18/24/2)

B. 73rd Session of the Executive Committee (CCEXEC73)

CCEXEC73 encouraged closer collaboration between CCRVDF and CCPR when considering MRLs for compounds used as both veterinary drugs and pesticides and invited the two Committees to explore innovative ways to foster such collaboration.

African Union commends and supports the recommendation by CCEXEC 73 for closer collaboration between CCRVDF and CCPR when considering compounds used as both veterinary drugs and pesticides.

AGENDA ITEM 3: MATTERS OF INTEREST ARISING FROM FAO/WHO AND FROM THE 85th MEETING OF THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA) (CX/RVDF 18/24/3)

Position: African Union appreciates the work of FAO and WHO in providing technical support in the area of antimicrobial resistance. African Union also takes note of the report of the 85th FAO and WHO Expert Committee of Food Additives (JECFA) in the provision of scientific advice to Codex member countries and observers.

AGENDA ITEM 4: REPORT ON THE OIE ACTIVITIES, INCLUDING THE HARMONISATION OF TECHNICAL REQUIREMENTS FOR REGISTRATION OF VETERINARY MEDICINAL PRODUCTS (VICH) CX/RVDF 16/23/4

Position: African Union commends the OIE's close cooperation with Codex, as one of the relevant standard-setting bodies recognized by the SPS Agreement of the WTO. The OIE addresses food safety-related issues in its standard-setting activities and works closely with CAC and its Committees, and with other international organizations in promoting safe international trade in animals and their products.

AGENDA ITEM 6.1 : PROPOSED DRAFT MRLs FOR ZILPATEROL HYDROCHLORIDE (CATTLE FAT, KIDNEY, LIVER, MUSCLE) (81st JECFA) AT STEP 4 (REP 17/RVDF App.V)

ZILPATEROL HYDROCHLORIDE (β 2-adrenoceptor agonist)

Position: African Union supports the advancement of Zilpaterol Hydrochloride to step 5 on account of 85th JECFA recommendation.

Issue and Rationale: During the previous zilpaterol assessment, at its 81st meeting, JECFA accounted for limited oral bioavailability of only the non-extractable (bound) zilpaterol residues in cattle tissues. The remaining (extractable) zilpaterol residues were considered to be fully bioavailable. The new bioavailability data submitted to JECFA 85th, support the approach used in the previous assessment. Following evaluation of these data, the MRLs recommended by JECFA at its eighty-first meeting remain unchanged.

JECFA's recommended MRLs for Zilpaterol Hydrochloride in cattle are: 3.3 μ g/kg in kidney, 3.5 μ g/kg in liver and 0.5 μ g/kg in muscle.

AGENDA ITEM 7: DISCUSSION PAPER ON MRLS FOR GROUPS OF FISH SPECIES (CX/RVDF 18/24/7)

Position: African Union commends the EWG for the good work on the discussion paper for groups of fish species. In view of the conclusion of the EWG and the recommendations therein, African Union supports recommendation 'C' of the EWG which proposes *No grouping, but discuss further guidance on national risk management options as this might seem an effective way forward.*

Issue and Rationale: The EWG noted that the absence of MRLs for veterinary drugs in fish species raises challenges for appropriate protection of human health and fair trade practices. So far, there are only five compounds with established MRLs. Of the five substances for which JECFA has made recommendations of MRLs for finfish, two have been for “fish” and three for “salmon” and/or “trout”, based on the information provided. For the substances for which recommendations have been for “fish”, data have been provided for three or more diverse species of finfish.

African Union agrees with the EWG submission that lack of MRLs for fish species reduces the variety of drugs available to treat diseases, and thus affects the possibility of maintaining good fish health by veterinary treatments in aquaculture. Therefore, Extrapolating to several fish would contribute to expand the variety of available drugs for fish. Extrapolating MRLs will also reduce the number of studies performed with animals and thus follow the principles of replacement, refinement and reduction principles for animal welfare.

African Union recognizes that the EWG members had different views on grouping and since it was noted that there were no groupings according to salinity, phylogeny/common physiology and common behavior which have been performed, so grouping according to these parameters needs to be performed before a final grouping can be done. The only approved grouping by fish order so far is performed by VICH. It was also suggested not grouping fish. This due to the fact that the ADI is set independently of the target animal species, and that safety assessments of the drug are done independently of the target animal species.

AGENDA ITEM 8: DISCUSSION PAPER ON EDIBLE OFFAL TISSUES (possible definition and edible offal tissues of interest in international trade) (CX/RVDF 18/24/8)

Position: African Union commends the good work of the EWG on the discussion paper on edible offals. African Union supports the conclusions of the EWG on the general definition of offals and the specific definition of edible offals. African Union further recommend adoption of the proposed definitions to the committee for incorporation in the glossary of terms and definitions.

Issue and rationale: The 23rd Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF23) agreed to establish an Electronic Working Group (EWG), to prepare a discussion paper in response to the request from 81st JECFA for CCRVDF to “provide a definition of edible offal”. The discussion paper aimed at recommending a definition of edible offal tissue and specifying edible offal tissues of interest in international trade.

AGENDA ITEM 10: DISCUSSION PAPER ON THE EVALUATION OF THE RATIONALE FOR THE DECLINE IN NEW COMPOUNDS TO BE INCLUDED IN THE CCRVDF PRIORITY LIST FOR EVALUATION BY JECFA (CX/RVDF 18/24/10)

Position: African Union commends HealthforAnimals for the good work done in the discussion paper. African Union notes that the paper has highlighted the benefits of JECFA evaluation, which are recognised worldwide and also highlights the challenges experienced by the industry during submission of compounds for evaluation. African Union recommends that the CCRVDF consider looking into the concerns expressed by the industry with the aim of re-evaluating its processes without compromising the integrity of JECFA as the key risk assessment body.

AGENDA ITEM 11: DATABASE ON COUNTRIES’ NEEDS FOR MRLs (CX/RVDF 18/24/11)

Position: African Union commends the EWG for the work on database on countries needs for MRLs. The African Union supports the recommendations of the EWG to hold an in-session working group to allow discussion of the prioritization approaches presented in the report. Such discussion could help to build consensus on a single top-ten list of veterinary drugs in need of Codex MRLs to be considered by the CCRVDF.