

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item: 10**

**CRD 12**

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS**  
**Twenty-fourth Session**  
**Comments Submitted by: The European Union**

The European Union and its Member States (EUMS) would like to thank Health for Animals for preparing an interesting paper on issues surrounding the Codex process of setting MRLs for veterinary drugs.

The paper makes a number of proposals to change JECFA procedures. As a general comment to these proposals, the EUMS would like to emphasise that it is of utmost importance to maintain the integrity and transparency of JECFA evaluations.

The single most important reason for the low number of new substances submitted for the Codex process is the fact that very few new substances are being developed for food producing animals. As correctly stated in the paper, Codex has little or no influence on such market dynamics. The EU notes that the situation is completely different in the area of pesticides where CCPR and JMPR are under severe pressure due to high volume of new substances for which Codex MRLs are requested.

While Codex Members can do little to resolve the above root cause for the low number of new substances submitted for JECFA evaluations, this should not prevent exploring ways to effectively contribute to the Codex process of setting global food safety standards. One such area is funding of the FAO/WHO scientific work. To this end, the EU will support financially the Codex risk assessment bodies (JMPR, JECFA JEMRA) with EUR 420.000 over a period of three years (2018 – 2020). In longer term more sustainable financing mechanisms must be established, e.g. financing from the core budgets of WHO and FAO.

It is also worth to explore other avenues to save resources and make the best use of global expertise. In particular, it would be worth exploring how cooperation between the FAO/WHO scientific bodies and national risk assessors could best serve Codex work.