

MRLS for groups of fish species

Agenda item 7

EWG hosted by Norway and Japan

Terms of reference

To develop a discussion paper on the feasibility of establishing MRLs for groups of fish species for veterinary drugs being considered by JECFA/CCRVD in the light of

- ▶ public health and
- ▶ international trade

Information from member countries

- ▶ 12 members submitted data
- ▶ Approx. 50 substances reported to be in use worldwide
- ▶ 12 different orders of fish in aquaculture

First draft of discussion paper/feedback

- ▶ Discussed terms and principles on grouping fish used in member states
- ▶ Feedback: No common practice on grouping fish

Second draft of discussion paper/feedback

- ▶ Comments on how:
 - ▶ salinity
 - ▶ temperature
 - ▶ lipid content
 - ▶ common behavior will influence on depletion

Three possible ways forward:

- ▶ Salinity, temperature, lipid content and common behavior equally important when grouping fish
- ▶ Different approaches to grouping
- ▶ The co-chairs found three possible ways forward:
 - ▶ Option A
 - ▶ Option B
 - ▶ Option C
- ▶ See page six in the document

Recommendation A

► Fish must be grouped in to:

1. High salinity, low salinity
2. High temperature, low temperature
3. High lipid content, low lipid content
4. Herbivor or carnivor

Yields at least 16
different groups

► Need for grouping fish before evaluating

► Evaluation of 45 remaining drugs means 720 evaluations

Recommendation A

- ▶ **Advantages: derably**
 - ▶ Most precise grouping
- ▶ **Topics needed to discuss**
 - ▶ 720 evaluation to be performed of the 45 remaining drugs
 - ▶ Considerable amount to be done before grouping
 - ▶ The effectiveness of resources

Recommendation B

- ▶ JECFA extrapolates and derives MRLs for all fin fish with conservative approach

Recommendation B

- ▶ Advantages
 - ▶ MRLs can be established without residue depletion data on all species
- ▶ Topics that needs to be considered:
 - ▶ The MRLs might be conservative (differ from MRLs in the member states)

Recommendation C

- ▶ No grouping, but discuss further guidance on national risk management options
 - ▶ Exclude GVP and withdrawal times from risk assessment/leaving GVP and withdrawal time to risk management
 - ▶ Possible to extrapolate and set MRLs for larger groups of fish

Recommendation C

- ▶ Advantages
 - ▶ Establish MRLs which cover all finfish species with minimum data
- ▶ Topics need to be considered:
 - ▶ Can only be achieved by excluding GVP and withdrawal times from risk assessment.
 - ▶ Must leave GVP and withdrawal times to risk management
 - ▶ Risk assessment must be done for each species to determine appropriate withdrawal time to ensure conformity to MRL.

Thank you for your attention!

