

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 6, 7, 8, 9, 10

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

26th Session

13-17 February 2023

Portland, Oregon, United States of America

*Comments submitted by Ghana*

#### Agenda Item 6: MRLs for veterinary drugs in foods

Nigeria takes note of matters referred by CAC and other subsidiary bodies as and when available

#### **MRLs for Ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle) at Step 7**

**Position:** Ghana recommends the discontinuation of the procedures for the advancement or adoption of MRLs for Ivermectin (sheep, pigs and goats – fat, kidney, (REP21/RVDF25 Appendix II liver and muscle) at Step 7 as JECFA has re-evaluated the MRLs and new recommended MRLs have been presented for consideration at CCRVDF26. The MRLs recommended for discontinuation are as follows:

Species	Muscle (µg/kg)	Liver (µg/kg)	Kidney (µg/kg)	Fat (µg/kg)
Sheep, pigs and goats	10	15	15	20

Ghana supports the adoption of MRLs for Ivermectin in pigs, sheep and goats at Step 5/8 as follows:

Species	Muscle (µg/kg)	Liver (µg/kg)	Kidney (µg/kg)	Fat (µg/kg)
Pigs	15	30	20	50
Sheep and goats	30	60	20	100

**Rationale:** CCRVDF25 recommended to JECFA the re-evaluation of the MRLs for Ivermectin for pig, sheep and goat tissues.

CCRVDF25 recommended to JECFA the re-evaluation of the MRLs of Ivermectin as the previous proposals on MRLs were very conservative and some countries had proposed to provide additional scientific data. In the view of the new data, JECFA94 re-evaluated the MRLs for Ivermectin in pig, sheep and goat tissues and the results have been proposed for adoption at Step 5/8 to the Commission.

#### **MRLs for Ivermectin (pigs, sheep and goats) and Nicarbazin (chicken) at Step 4**

**Position:** Ghana also supports the advancement of MRLs for Nicarbazin in chicken at Step 5 as follows:

Species	Muscle (µg/kg)	Liver (µg/kg)	Kidney (µg/kg)	Skin with Fat (µg/kg)
Chicken	4000	15000	8000	4000

**Rationale:** JECFA94 assessment established MRLs for Nicarbazin in chicken of 4000 microgram/kg for muscle, 15000 microgram/kg for liver, 8000 microgram/kg for kidney and 4000 microgram/kg for skin, Ivermectin is extensively used as an endectocide, and therefore limits for residues in these commodities need to be established by Codex to protect consumer health and to promote international trade.

**Agenda Item 7: Extrapolation of MRLs for veterinary drugs in foods to one or more species*****Extrapolated MRLs for different combinations of compounds/commodities at Step 4***

**Position:** Ghana recommends that the extrapolated MRLs for the 12 different drugs in the various animal species be advanced to Step 5.

**Rationale:** The extrapolation was done in line with the rules set out in the 'Approach for the extrapolation of maximum residue limits for veterinary drugs to one or more species' that was adopted by CAC44. The compounds are commonly used in Ghana for the treatment of common diseases in animals. The availability of MRLs for the compounds will facilitate trade and provide a reference to assure protection of consumer health.

***Approach for the extrapolation of MRLs for residues of veterinary drugs for offal tissues***

**Position:** Ghana supports the proposal by the EWG, that further discussions should be held during CCRVDF26 on how to generate MRLs in edible offal tissues other than kidney and liver.

**Rationale:** It is noted that the EWG was not able to develop a suitable approach for the extrapolation of MRLs for residues of veterinary drugs in offal tissues. Most offal tissues are smooth muscles which are quite different from skeletal muscles for which MRLs have already been determined. Extrapolation could work if corresponding tissues are used across species. Guidance may be provided by JECFA on how to address the concerns raised about the proposed approach.

**Agenda Item 8: Criteria and procedures for the establishment of action levels for unintended and unavoidable carryover of veterinary drugs from feed to food of animal origin**

**Position:** Ghana commends the EWG for developing the criteria and procedures for the establishment of action levels for residues of veterinary drugs in foods linked to the unintended and unavoidable carryover of veterinary drugs from non-target feed to food of animal origin.

Ghana supports the "general criteria or rules" on the proposed approach for establishing action levels for veterinary drug residues in food products from non-target animals linked to the unintended and unavoidable carry-over of veterinary drugs in non-target animal feed.

Ghana further supports the proposed four step procedure for setting the Action Levels for residues of veterinary drugs detected in foods of animal origin (i.e. from non-target animals) determined to be caused by unavoidable and unintended veterinary drug carry-over in non-target animal feed based on the Guidelines on the Application of Risk Assessment for Feed (CXG 80- 2013) and risk assessment approaches.

In addition, Ghana supports the inclusion of an option to use default low levels of carry-over from medicated to un-medicated feed provided that this is supported by data from studies/surveys undertaken in feed mills operating under good manufacturing practice conditions.

**Agenda Item 9: Coordination of work between CCPR and CCRVDF*****Matters of interest arising from the Joint CCPR/CCRVDF Working Group***

**Position:** Ghana supports the work of the EWG and the following recommendations they made: CCPR and CCRVDF to continue working towards harmonizing their risk assessment methodologies, including ways to establish single, harmonized acceptable daily intake values and MRLs for dual-use compounds.

- JECFA/JMPR ask sponsors to consent to data sharing upon submission of the data packages.
- The current joint EWG to identify and prioritize issues affecting both committees and recommend ways to address the issues and to inform CAC accordingly.
- Development of a database of dual-use compounds that can be shared between committees to facilitate the development of a single, harmonized MRL, and
- Creation of Joint EWG that will identify dual-use compounds that have different MRLs for the same edible commodity of some compounds used as veterinary medicines and as pesticide. Those compounds can have different MRLs for the same edible commodity of animal origin. To solve that issue, CCEXEC (CCEXEC81, 2021) recommended that CCRVDF and CCPR make use of a joint Electronic Working Group (EWG) to further advance the work on cross-sectional issues to facilitate the establishment of single/harmonized MRLs for edible animal tissues for compounds with dual use.

**Rationale:** Some compounds are used as veterinary medicines and as pesticide for example Ivermectin. These compounds can have different MRLs for the same edible commodity of animal origin. To solve that issue, CCEXEC (CCEXEC81, 2021) recommended that CCRVDF and CCPR make use of a joint Electronic Working Group (EWG) to further advance the work on cross-sectional issues to facilitate the establishment of single/harmonized MRLs for edible animal tissues for compounds with dual use.

**Agenda Item 10: Priority list of veterinary drugs for evaluation or re-evaluation by JECFA**

**Position:** Ghana wishes to submit the following veterinary drugs to be included in the priority list for evaluation by JECFA: Norfloxacin, Doxycycline, Tylosine, Gentamycin, Colistin, Trimethoprim and Ciprofloxacin.