

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item: 3, 4, 5, 6.1, 6.2, 7, 8, 10, 11, 12

CRD 20

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

AGENDA ITEM 3: Activities of the joint FAO/IAEA Division of Nuclear Techniques in food and agriculture relevant to Codex work.

Uganda commends the IAEA in its initiatives and collaborations especially in development of human and physical capacity. Uganda participated in research activities, capacity building including laboratory networking, establishment of database for analytical methods on Veterinary Drug Residues, scientific meetings, Codex activities and AMR related work.

AGENDA ITEM 4: Report of the OIE activities, including harmonization of technical requirements for registration of veterinary medicinal products.

Uganda acknowledges the work of OIE in addressing food safety-related issues in its standard-setting activities through working closely with CAC and its Committees, and with other international organizations in promoting safe international trade in animals and their products.

AGENDA ITEM 5: Proposed draft risk management recommendation for gentian violet.

Uganda supports the proposed risk management recommendation presented in Codex document REP17/RVDF App. II which states as follows;

"In view of the JECFA conclusions on the available scientific information, there is no safe level of residues of gentian violet or its metabolites in food that represents an acceptable risk to consumers. For this reason, competent authorities should prevent residues of gentian violet in food. This can be accomplished by not using gentian violet in food producing animals."

The last sentence *"This can be accomplished by not using gentian violet in food producing animals."* should be retained given that Uganda still has limited information and capacity to carry out sufficient monitoring and surveillance. Gentian Violet is structurally related to malachite green and Uganda supports the risk management recommendation for Gentian Violet based on JECFA 78th recommendation.

AGENDA ITEM 6.1: proposed draft MRLs for Zilpaterol Hydrochloride (cattle fat, kidney, liver, muscle) at step 4.

ZILPATEROL HYDROCHLORIDE

Uganda supports the position of the African Union to advance Zilpaterol Hydrochloride to step 5 on account of 85th JECFA recommendation of 3.3µg/kg in kidney, 3.5µg/kg in liver and 0.5µg/kg in muscle.

AGENDA ITEM 6.2: Proposed Draft MRLs for Amoxicillin (Finfish Fillet, Muscle); Ampicillin (Finfish Fillet, Muscle); Flumethrin (Honey); Lufenuron (Salmon and Trout) Monepantel (Cattle Fat, Kidney, Liver, Muscle).

AMOXICILLIN (antimicrobial agent)

Position: Uganda supports the advancement of Amoxicillin to step 4 on account of 85th JECFA recommendation.

Issue & Rationale: JECFA 85th assessment of the MRLs of Amoxicillin {Finfish fillet (50µg/kg) & Finfish muscle (50µg/kg)} and subsequent recommendations.

AMPICILLIN (antimicrobial agent)

Position: Uganda agrees with recommendation to advance Amoxicillin to step 4 on account of 85th JECFA recommendation.

Issue & Rationale: JECFA 85th assessment of the MRLs of Ampicillin {Finfish fillet (50µg/kg) & Finfish muscle (50µg/kg)} and subsequent recommendations.

FLUMETHRIN (insecticide)

Position: Uganda agrees with the advancement of Flumethrin to step 4 on account of 85th JECFA recommendation.

Issue & Rationale: JECFA 85th assessment of the MRLs of Flumethrin (honey 6µg/kg) and subsequent recommendations.

LUFENURON (insecticide)

Position: Uganda agrees with the recommendation from the African Union for the advancement of Lufenuron to step 4 on account of 85th JECFA recommendation.

Issue & Rationale: JECFA 85th assessment of the MRLs of Lufenuron {Salmon (1350µg/kg) and Trout (1350 µg/kg)} and subsequent recommendations.

MONEPANTEL (anthelmintic)

Position: Uganda agrees with the advancement of Monepantel to step 4 on account of 85th JECFA recommendation.

Issue & Rationale: JECFA 85th assessment of the MRLs of Monepantel {Cattle (Fat 7000µg/kg), (kidney 1000 µg/kg), (Liver 2000 µg/kg) and (Muscle 300 µg/kg)} and subsequent recommendations.

AGENDA ITEM 7: Discussion Paper on MRLs for Groups of Fish Species

Position: Uganda agrees with the conclusion of the EWG and the recommendations therein, Uganda therefore supports recommendation 'C' of the EWG which proposes No grouping, but discuss further guidance on national risk management.

Uganda agrees that absence of MRLs for veterinary drugs in fish species raises challenges for appropriate protection of human health and fair trade practices. 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.

AGENDA ITEM 8: Discussion paper on edible offal tissues of interest in international trade.

Position: Uganda supports the conclusions of the EWG on the general definition of offals and the specific definition of edible offals. Uganda further supports the adoption of the proposed definitions to the committee for incorporation in the glossary of terms and definitions. Uganda agrees with the proposal to establish MRLs in edible offals given that some organs like the liver and the kidney may be stores for high levels of veterinary drug residues.

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.

Position: Uganda supports the fact that the CCRVDF considers 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

Position: Uganda agrees with 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.

AGENDA ITEM 12: Draft priority list of list of Veterinary drugs requiring evaluation or re- evaluation by JECFA.

Position: Uganda supports the request by the European Union on inclusion of Flumethrin to the priority list of drugs requiring evaluation or re-evaluation by JECFA.

Flumethrin is an insecticide registered for use in Uganda as an acaricide for control of ticks, flies (biting and sucking) and mange in cattle, however, MRL for flumethrin does not exist at the international level. Establishment of MRLs for this compound will promote food safety, animal health, and trade.