CODEX ALIMENTARIUS COMMISSION



Food and Agriculture Organization of the United Nations



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Agenda Item 3.2

CRD04 June 2021

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

25th Session (Virtual) 12-16 and 20 July 2021

Comments Submitted by the International Feed Industry Federation

AGENDA ITEM 3.2: MATTERS OF INTEREST ARISING FROM THE FAO/WHO ON FEED SAFETY INCLUDING THE JOINT FAO/WHO EXPERT MEETING ON CARRY-OVER IN FEED AND TRANSFER FROM FEED TO FOOD OF UNAVOIDABLE AND UNINTENDED RESIDUES OF APPROVED VETERINARY DRUGS

Summary:

The International Feed Industry Federation (IFIF) is grateful to the FAO, WHO, and experts that contributed to the report on *Carryover in feed and transfer from feed to food of unavoidable and unintended residues of approved veterinary drugs.* The expert report reflects many of the observations, processes, and practices that are utilized in various countries to manufacture feed and limit the risk of unavoidable and unintended carryover of veterinary drugs.

The report is an accurate evaluation of the minimal risk to human health and the limited number of trade concerns. It also provides a good overview of existing risk assessment and management options available to Member States and stakeholders.

Since the Codex Committee initiated discussions on this matter in 2015, the FAO in collaboration with IFIF has updated the *FAO/IFIF Good Practices for the Feed Sector: Implementing the Codex Alimentarius Code of Practice on Good Animal Feeding (2020)* manual. The 2020 manual includes a new and expanded section on the practices countries and individual feed manufacturers can adopt to minimize the risk associated with unavoidable and unintended carryover of veterinary drugs. *The FAO/IFIF Good Practices for the Feed Sector* manual is based on best practices stemming from regulations and experts around the world.

International Feed Industry Federation's Position:

IFIF appreciates the work of the expert committee to review the science, the possible trade concerns, and potential risks associated with carryover of veterinary drugs. Since the updated *FAO/IFIF Good Practices for the Feed Sector: Implementing the Codex Alimentarius Code of Practice on Good Animal Feeding* (2020) addresses feed manufacturing practices and guidelines to assess and reduce the risk of unavoidable and unintended carry-over of approved veterinary drugs in feed, IFIF recommends that the Codex Committee encourages the use of this manual instead of developing new resources.

The IFIF recommends that the reference to the *Code of Practice on Good Animal Feeding (CAC/RCP 54-2004)* be retained for Member States and stakeholder to refer to and implement when it relates to unavoidable and unintended carryover of veterinary drugs.