CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 5, 6, 8 and 11 **CRD12**

July 2021

ORIGINAL LANGUAGE ONLY

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 Thailand

Agenda Item 5 Maximum residue limit for flumethrin (honey) at Step 7

Thailand has no objection to the proposed Maximum Residue Limit for flumethrin (honey) at Step 7. We strongly support that the use of this substances must be adhered to Good Veterinary Practice in order to protect the consumer health.

Agenda Item 6.1 Maximum residue limits for diflubenzuron (salmon – muscle plus skin in natural proportion); halquinol (in swine - muscle, skin plus fat, liver and kidney); ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle) at Step 4

Thailand has no objection to the proposed Maximum Residue Limit for halquinol when it is derived from the therapeutic use only.

As per Thailand's regulations, the administration of antimicrobial agents is permitted only for therapeutic purpose, while the use as growth promoters is strictly prohibited. In view of this, the registration of halquinol is authorized only for therapeutic use in animals and its MRLs should be established to protect the health of consumers.

Agenda Item 6.2 Maximum residue limits for zilpaterol hydrochloride (cattle fat, kidney, liver, muscle) (JECFA81 and JECFA85) retained at Step 4

Thailand has a serious concern on the administration of Zilpaterol hydrochloride in food-producing animals. It is a general policy in our country to prohibit the administration of beta-agonists. Referring to Animal Feed Quality Control Act B.E.2558, ß-agonist is prohibited for the use in feed.

Moreover, with regard to the proposed draft MRLs for zilpaterol hydrochloride in 3 tissues of cattle, there are several tissues of offal that have not been fully assessed by JECFA. When considering the consumption pattern of Thai consumer, who commonly eat other tissues than kidney, liver and muscle as normal meal, there is a health concern for our consumer if Zilpaterol hydrochloride is administrated to food-producing animals and its residues is distributed through all tissues of the animal.

Therefore, we strongly do not support the establishment and advancement of Codex MRLs for Zilpaterol hydrochloride.

Agenda Item 8 Discussion paper on the development of a harmonized definition for edible tissues of animal origin (including edible offal)

Definition for edible offal for adoption:

Those parts of an animal, apart from the skeletal muscle and fat, that are considered fit for human consumption

We do not object to a definition of edible offal as proposed and also support the CCRVDF to recommend CCPR adopting the same definition for consistency and facilitation of MRLs for dual compounds.

Classification of Food and Feed (CXA 4-1989)

We do not object to the development of a mechanism for hierarchical classification of edible offal which advantages to the establishing MRLs for all edible offal commodities.

Extrapolation of MRLs for edible offal

We support the CCRVDF to develop the extrapolation rules for veterinary drugs residues in edible offal. The work shall be continued by the CCRVDF EWG to provide MRLs for edible offals. In addition, the establishment of extrapolation rules may concern animal toxicological testing data to approach the MRLs for different edible offal tissues.

Other Matters: Food descriptors – Coordination between JECFA/JMPR

We support the collaboration between JECFA and JMPR to provide a harmonized guidance on appropriate descriptors which benefits to database used for risk assessment.

Agenda Item 11 Priority list of veterinary drugs requiring evaluation or re-evaluation by JECFA

Regarding to the proposal for inclusion of Norfloxacin in the priority list for JECFA evaluation, we currently do not authorize the use of Norfloxacin in feed for preventive purpose and this antimicrobial agent is not registered for animal use in Thailand. Moreover, under Thailand's National Strategic Plan on Antimicrobial Resistance this antimicrobial is strictly reserved only for human.