CODEX ALIMENTARIUS COMMISSION



Food and Agriculture Organization of the United Nations



CRD 11

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Agenda Items, 6.1, 7, 8, 10, 11

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Twenty-fourth Session

Comments Submitted by: Ghana

AGENDA ITEM 6.1: PROPOSED DRAFT MRLs FOR ZILPATEROL HYDROCHLORIDE (CATTLE FAT, KIDNEY, LIVER, MUSCLE) (81st JECFA) AT STEP 4 (REP 17/RVDF App.V)

Position: Ghana recommends the advancement of Zilpaterol Hydrochloride to step 5 on account of 85th JECFA recommendation.

Rationale: At JECFA's 81st meeting, zilpaterol assessment accounted for limited oral bioavailability of only the non-extractable (bound) zilpaterol residues in cattle tissues whereas the remaining (extractable) zilpaterol residues were considered to be fully bioavailable. However new bioavailability data submitted to 85th JECFA support the approach used in the previous assessment. The MRLs recommended by JECFA at its eighty-first meeting remain unchanged after evaluation of these data with JECFA's recommended MRLs for Zilpaterol Hydrochloride in cattle as follows: 3.3µg/kg in kidney, 3.5µg/kg in liver and 0.5µg/kg in muscle.

AGENDA ITEM 7: DISCUSSION PAPER ON MRLS FOR GROUPS OF FISH SPECIES (CX/RVDF 18/24/7)

Position: Ghana supports recommendation 'C' of the EWG which proposes No grouping, but discuss further guidance on national risk management options as this might seem an effective way forward.

Rationale: Ghana suggests no grouping fish. This due to the fact that the acceptable daily intake (ADI) is set independently of the target animal species, and that safety assessments of the drug are done independently of the target animal species.

In addition, feedback from EWG members shows different views on the need for grouping.

AGENDA ITEM 8: DISCUSSION PAPER ON EDIBLE OFFAL TISSUES (possible definition and edible offal tissues of interest in international trade) (CX/RVDF 18/24/8)

Position: Ghana supports the conclusions of the EWG on the general definition of offals and the specific definition of edible offals. Ghana further recommends adoption of the proposed definitions to the committee for incorporation in the glossary of terms and definitions.

Rationale: Ghana takes note of the EWG observations in various Codex text which have defined meat to include edible offals. It is worth noting that the glossary of terms and definitions (CXM 5-1993) has no definition of offals and or edible offals and groups these tissues with meat.

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 (CX/RVDF 18/24/10)

Position: Ghana recommends that the CCRVDF consider 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 (CX/RVDF 18/24/11)

Position: Ghana supports 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 VETERINARY DRUGS REQUIRING EVALUATION OR RE-EVALUATION BY JECFA (CX/RVDF 18/24/12)

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

Rationale: Flumethrin is an insecticide registered for use in over 17 African countries 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.