

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 6, 7

CRD13

February 2023

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 Thailand

Agenda Item 6: MRLs for veterinary drugs in foods

Thailand supports the recommendations of JECFA94 on MRLs for ivermectin (pigs, sheep, and goats) and nicarbazin (chicken).

To avoid confusion, we suggest discontinuing the consideration of the draft MRLs for ivermectin recommended by JECFA88.

Agenda Item 7: Extrapolation of MRLs for veterinary drugs in foods to one or more species

Recommendation 1:

General comment

In principle, we do not object to the proposed extrapolated MRLs in Appendix I, as the proposed extrapolated MRLs are based on Annex C: Approach for the Extrapolation of Maximum Residue Limits of Veterinary Drugs to One or More Species (CX/CAC21/44/2 Add.2).

Specific comments

1. Amoxicillin – extrapolation to ruminants

We realize that the star-shaped sign (*) that appears after "Fat" exclusively refers to the fat/skin of pigs. Therefore, we humbly request that the sign (*) placed after "Fat" for ruminants should be removed in this context.

2. Cyhalothrin and Moxidectin – extrapolation to ruminants:

To be clear, we agree with EWG's recommendation to add the note to the veterinary medication MRL database and CX/MRL 2.

Recommendation 2:

We do not object to seek advice from JECFA on whether the appropriate M:T value for residues of deltamethrin in bovine milk is 1.

Moreover, since JECFA specifies the M:T value for deltamethrin residues in bovine milk as 1, we suggest that extrapolated MRLs in ruminant milk should be established using the approach described in Annex C: Approach for the Extrapolation of Maximum Residue Limits of Veterinary Drugs to One or More Species.

Recommendation 3:

We note that the approach for the extrapolation of maximum residue limits for veterinary drugs to one or more species does not allow the extrapolation of the bovine milk MRL for ivermectin to goat and sheep milk

Recommendation 4:

We are of the view that ways forward to extrapolate MRLs for residues of veterinary drugs for offal tissues other than kidney and liver must be supported by strong scientific data and animal toxicity testing findings. This approach should not be mathematically based.

Moreover, the lack of experience and data on setting MRLs for offal tissues other than liver and kidney will create the inappropriate extrapolated MRLs. We are of the view that such MRLs may accidentally generate trade barriers and are incapable of ensuring consumer safety.

Agenda Item 8 Criteria or requirements for the establishment of action levels for unintended or unavoidable carryover from feed to food of animal origin**General comment**

We propose to determine priorities for the consideration of veterinary drugs and non-target animal species to facilitate the data management on residues of veterinary drugs in foods for

the establishment of action levels.

Specific comments**1. General criteria: bullet point 6**

We would like to request EWG to offer further clarification on the wording “(or JECFA recommended)” for more clarity.

We are of the opinion that the establishment of action levels should be based on “Codex MRLs” rather than “MRLs recommended by JECFA” as “Codex MRLs” considered and adopted by CCRVDF are clearly referable. In this context, we propose removing “(or JECFA recommended)”.

6. Action levels should be derived only for residues of veterinary drugs that have adopted ~~(or JECFA recommended)~~ Codex maximum residue limits (MRLs).

2. Human dietary exposure assessment:

We are of the view that the application of “similar MR:TR ratios” should be clearly defined to achieve a mutual understanding. As illustrated in the example of Nicarbazin, the lowest MR:TR ratio within an individual specie was applied.