

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 Items 4, 6, 7

CRD21

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 African Union

Agenda Item 4: Matters of interest arising from the Joint FAO/IAEA Centre (CX/RVDF 23/26/4)

Position: African Union commends the joint FAO/IAEA in its initiatives and collaboration with African Member States especially in development of laboratory capacity for analysis of veterinary drugs and pesticide residues. These capacity building interventions have been key in raising the overall food safety standards in Africa.

Agenda Item 6: MRLs for veterinary drugs in foods

Agenda Item 6.1: MRLs for Ivermectin (sheep, pigs and goats – fat, kidney, (REP21/RVDF25 Appendix II liver and muscle) at Step 7

Position: African Union supports the discontinuation of the procedures for the advancement or adoption of MRLs for Ivermectin (sheep, pigs and goats – fat, kidney, (REP21/RVDF25 Appendix II liver and muscle) at Step 7 as JECFA has re-evaluated the MRLs and new recommended MRLs are presented for consideration at CCRVDF26. The MRLs recommended for discontinuation are as follows:

Species	Muscle (µg/kg)	Liver (µg/kg)	Kidney (µg/ kg)	Fat (µg/kg)
Sheep, pigs and goats	10	15	15	20

Rationale: The proposed MRLs are conservative and could potentially disrupt trade.

6.2 MRLs for Ivermectin (pigs, sheep and goats) and Nicarbazin (chicken) at Step 4 CL 2022/71-RVDF

Position: African Union supports the adoption of MRLs for Ivermectin in pigs, sheep and goats at Step 5/8 as follows:

Species	Muscle (µg/kg)	Liver (µg/kg)	Kidney (µg/ kg)	Fat (µg/kg)
Pigs	15	30	20	50
Sheep and goats	30	60	20	100

Position: African Union supports the advancement of MRLs for Nicarbazin in chicken at Step 5 as follows:

Species	Muscle (µg/kg)	Liver (µg/kg)	Kidney (µg/ kg)	Skin with Fat (µg/kg)
Chicken	4000	15000	8000	4000

Rationale: CCRVDF25 recommended to JECFA the re-evaluation of the MRLs of Ivermectin as the previous proposals on MRLs were very conservative and some countries had proposed to provide additional scientific data. In the view of the

new data, JECFA94 re-evaluated the MRLs for Ivermectin in pig, sheep and goat tissues and the results are proposed for adoption at Step 5/8 to the Commission. JECFA94 assessment established MRLs for Nicarbazin in chicken of 4000 microgram/kg for muscle, 15000 microgram/kg for liver, 8000 microgram/kg for kidney and 4000 microgram/kg for skin. Ivermectin is extensively used as an endectocide, and therefore limits for residues in these commodities need to be established by Codex to protect consumer health and to promote international trade.

Agenda Item 7: Extrapolation of MRLs for veterinary drugs in foods

7.1 Extrapolated MRLs for different combinations of compounds/commodities at Step 4

Position: African Union commends the chairs of the EWG for the good work undertaken in developing the discussion paper on extrapolation of MRL. AU recommends that the extrapolated MRLs for the 12 different drugs in the various animal species be advanced to Step 5.

Rationale: The extrapolation was done in line with the rules set out in the Approach for the extrapolation of maximum residue limits for veterinary drugs to one or more species that was adopted by CAC44. The compounds are commonly used in the African region for the treatment of common diseases in animals. The availability of MRLs for the compounds will facilitate trade and provide a reference to assure protection of consumer health.

7.2 Approach for the extrapolation of MRLs for residues of veterinary drugs for offal tissues

Position: African Union commends the chairs of the EWG for the good working developing the discussion paper on extrapolation of MRL. AU supports the proposal by the EWG, that further discussions should be held during CCRVDF26 on how to generate MRLs in edible offal tissues other than kidney and liver. African Union also notes that the EWG was not able to develop a suitable approach for the extrapolation of MRLs for residues of veterinary drugs in offal tissues. Most offal tissues are smooth muscles which are quite different from skeletal muscles for which MRLs have already been determined. Extrapolation could work if corresponding tissues are used across species. Guidance may be provided by JECFA on how to address the concerns raised about the proposed approach.