

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CODEX ALIMENTARIUS COMMISSION

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COMMENTS ON THE DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 28TH SESSION OF CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOOD (CCRVDF28)

FOR ADOPTION BY THE 49TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

Submitted by

*Brazil, Chile, Egypt, Indonesia, Malaysia, New Zealand, Paraguay,
United Arab Emirates, United Kingdom, and the United States of America (USA)*

BACKGROUND

1. This document compiles the comments on the standards and related texts submitted to CAC49 for final adoption, as indicated in the relevant circular letters (CL 2026/29-CAC). The comments include those received through the Codex Online Commenting System (OCS)¹, or via email by the time this document was issued.
2. The comments in response to CL 2026/29-CAC is shown in Appendix I.

EXPLANATORY NOTES ON APPENDIX I

3. The comments received are presented in a table format, with two columns as follows:
 - **First column** – Presents the comments with the rationale.
 - **Second column** – Presents the provider of the comments (name of Member or Observer).

¹ OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardized way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

Appendix I

COMMENTS IN REPLY TO CL 2026/29-CAC

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
<p>Brazil supports the final adoption at Step 5/8, with omission of Steps 6 and 7, of the standards and related texts submitted by CCRVDF28 to CAC49.</p> <p>Brazil considers that the proposed extrapolated MRLs for camelids, the Guidelines on recommended risk-based actions to address residues of veterinary drugs in food caused by unavoidable and unintentional carryover in animal feed where there is no applicable Codex MRL, and the action levels for nicarbazin and lasalocid in chicken eggs are ready for adoption by the Commission.</p> <p>Brazil recognizes the importance of these texts in promoting science-based and risk-based approaches to the management of veterinary drug residues in foods, contributing to consumer health protection and to the facilitation of fair practices in food trade.</p> <p>Therefore, Brazil supports their adoption as proposed.</p>	Brazil
<p>Chile apoya el avance de los estándares y textos relacionados en los términos propuestos en la Carta Circular, por cuanto constituyen el reflejo de los debates técnicos desarrollados durante la 28ª reunión del CCRVDF y de los consensos alcanzados por el Comité, en los cuales Chile participó activamente y que se encuentran reflejados en su posición nacional.</p>	Chile
<p>Malaysia supports the proposed standards and related texts submitted for final adoption at Step 5/8 under CL 2026/29-CAC, namely:</p> <p>i) Maximum residue limits (MRLs) extrapolated for camelids, REP26/RVDF28, paragraph 64(i)(a-e) and Appendix III:</p> <ul style="list-style-type: none"> • Ivermectin – milk; • Tetracyclines (chlortetracycline, oxytetracycline, and tetracycline) – muscle, liver, kidney, milk. <p>ii) Guidelines on recommended risk-based actions to address the detection of residues of a veterinary drug in food caused by unavoidable and unintentional carryover of veterinary drugs in animal feed, where there is no applicable Codex MRL, REP26/RVDF28, paragraph 134 and Appendix VI.</p> <p>iii) Action levels for nicarbazin and lasalocid in chicken eggs, REP26/RVDF28, paragraph 137 and Appendix VII.</p>	Malaysia
<p>New Zealand supports the advancement of the proposed standards and related texts to adoption at Step 5/8. We consider that these outputs are generally based on sound scientific advice and contribute to the development of harmonised, risk-based approaches to the management of veterinary drug residues in food.</p> <p>New Zealand emphasises the importance of Codex standards in facilitating international trade and protecting consumer health and supports their timely adoption where the scientific basis is robust and the provisions are clear and implementable.</p> <p>Notwithstanding our general support, New Zealand offers the following comments to facilitate clarity, consistency, and practical implementation.</p>	New Zealand
<p>Paraguay manifiesta su aprobación oficial para la adopción definitiva del documento en el trámite 5/8. Consideramos que tanto las directrices y los enfoques basados en el riesgo, como los límites máximos de residuos propuestos, se encuentran plenamente listos para su implementación.</p>	Paraguay
<p>The UK supports the advancement of the standards and related texts submitted to CAC49, noting that they are scientifically robust, proportionate and underpinned by JECFA advice.</p> <p>In particular, the UK welcomes progress on extrapolated MRLs, guidance addressing residues arising from unavoidable feed carryover, and the agreement of action levels, all of which will help support international trade and maintain a high level of consumer protection.</p>	United Kingdom

COMMENT	MEMBER / OBSERVER
<p>The UK also welcomes the procedural improvements agreed to e.g. the CCRVDF's Priority List, which will enhance the efficiency, transparency and predictability of the Committee's future work.</p> <p>The UK looks forward to continued engagement in CCRVDF activities.</p>	

**REQUEST FOR COMMENTS AT STEP 5/8 ON THE MAXIMUM RESIDUE LIMITS (MRLs)
EXTRAPOLATED FOR CAMELIDS**

COMMENT	MEMBER / OBSERVER
<p>Chile apoya el avance de las siguientes normas y textos a Trámite 5/8:</p> <p>1. Límites máximos de residuos (LMR) extrapolados para camélidos:</p> <ul style="list-style-type: none"> • Ivermectina – leche • Tetraciclinas (clortetraciclina, oxitetraciclina y tetraciclina) – músculo, hígado, riñón y leche <p>Justificación: Chile considera que los LMR propuestos cumplen con los criterios previamente acordados por el CCRVDF para la extrapolación de límites máximos de residuos entre especies, y permitirán contar con referencias internacionales para camélidos, contribuyendo a la armonización y facilitación del comercio.</p> <p>En el caso de las tetraciclinas, Chile apoya la inclusión de clortetraciclina y oxitetraciclina, en coherencia con el enfoque de grupo aplicado por el Codex, donde los LMR se establecen considerando el conjunto de compuestos pertenecientes a la familia de las tetraciclinas, sobre la base de evaluaciones científicas comunes y criterios armonizados.</p>	Chile
<p>Egypt appreciates the work which done in the document & agrees that ivermectin does not meet the extrapolation criteria set by CCRVDF, and so the existing MRLs cannot be extrapolated to camelids.</p> <p>Egypt agrees that oxytetracycline meets all criteria set by CCRVDF for MRL extrapolation to camelids edible tissues and milk.</p> <p>Egypt agrees with the draft recommendation to extrapolate the oxytetracycline MRLs for cattle, sheep, pig and poultry to camelids species.</p> <p>Since the same criteria are also met for both tetracycline and chlortetracycline (and the marker residue is the sum of all three compounds), it is additionally recommended that the MRLs established for tetracycline and chlortetracycline are extrapolated to camelids (edible tissues and milk).</p>	Egypt
<p>Indonesia supports the adoption of MRLs extrapolated for camelids (Ivermectin: milk; Tetracyclines: muscle, liver, kidney, milk) at Step 5/8.</p>	Indonesia
<p>New Zealand supports the establishment of extrapolated MRLs for camelids for ivermectin (milk) and tetracyclines (muscle, liver, kidney, milk).</p> <p>We recognise the and strongly support the importance of extrapolation approaches in enabling the establishment of MRLs for minor and less commercially significant species, thereby supporting animal health and welfare while maintaining consumer protection and facilitating trade.</p> <p>New Zealand notes the importance of:</p> <ul style="list-style-type: none"> • Ensuring that the use of extrapolation is encouraged wherever possible, as long as there are national use approvals and no explicit public health reasons not to, so as to help facilitate the trade in products from minor species; • Providing sufficient clarity regarding the data and assumptions underpinning the extrapolation to support confidence in enforcement and compliance activities within countries; and • Maintaining consistency with existing Codex approaches to extrapolation across species. <p>Given these considerations were all positive, New Zealand considers these MRLs are appropriate for adoption.</p>	New Zealand
<p>UAE Position: UAE welcomes the adoption of MRLs extrapolated for ivermectin in camelids milk and Tetracyclines (chlortetracycline, oxytetracycline, and tetracycline) in muscle, liver, kidney, milk for camelids which will harmonize the compliance procedures between countries differing to codex in their national specifications and enhance fair trade in these commodities.</p>	United Arab Emirates
<p>The United States supports final adoption of the MRLs for ivermectin in camelid milk and tetracyclines in camelid muscle, liver, kidney and fat.</p>	USA

REQUEST FOR COMMENTS AT STEP 5/8 ON THE GUIDELINES ON RECOMMENDED RISK-BASED ACTIONS TO ADDRESS THE DETECTION OF RESIDUES OF A VETERINARY DRUG IN FOOD CAUSED BY UNAVOIDABLE AND UNINTENTIONAL CARRYOVER OF VETERINARY DRUGS IN ANIMAL FEED, WHERE THERE IS NO APPLICABLE CODEX MRL

COMMENT	MEMBER / OBSERVER
<p>Chile apoya el avance de las siguientes normas y textos a Trámite 5/8:</p> <p>2. Directrices sobre acciones recomendadas basadas en riesgo para abordar la detección de residuos de medicamentos veterinarios en alimentos causados por transferencia inevitable e involuntaria en los piensos, cuando no existe un LMR Codex aplicable</p> <p>Justificación: Chile apoya el avance de estas directrices, considerando que, tras los debates y ajustes realizados durante la reunión, el Comité acordó su avance, reconociéndolas como una herramienta complementaria a los niveles de acción.</p> <p>Estas directrices proporcionan orientación a las autoridades competentes para la evaluación rápida y basada en riesgo frente a la detección de residuos de medicamentos veterinarios en alimentos, derivados de la transferencia inevitable e involuntaria en los piensos, en situaciones en que no existe un LMR Codex aplicable. Asimismo, Chile valora que el enfoque propuesto otorga flexibilidad a las autoridades competentes para considerar la evidencia científica disponible y el contexto específico de cada caso.</p>	Chile
<p>In view of the request for comments on guidelines on risk based actions to be taken by competent authorities following the detection of a residue of a veterinary drug in food caused by unavoidable and unintentional carryover of veterinary drugs in animal feed where there is no applicable codex MRL to provide general comments on the overall structure, content, and flow of the Guidelines, as presented in Appendix I to CX/RVDF 26/28/9, including whether there are missing aspects that should be addressed in the Guidelines or provisions that need to be expanded to improve clarity or completeness (in this case please provide specific language under point 2(ii)).</p>	Egypt
<p>Indonesia supports the adoption Guidelines on recommended risk-based actions to address the detection of residues of a veterinary drug in food caused by unavoidable and unintentional carryover of veterinary drugs in animal feed, where there is no applicable Codex MRL at Step 5/8.</p>	Indonesia
<p>2. Guidelines on recommended risk-based actions to address residues arising from unavoidable and unintentional carryover in feed</p> <p>New Zealand supports the development of guidelines addressing residues of veterinary drugs in food resulting from unavoidable and unintentional carryover in animal feed where no Codex MRL exists.</p> <p>We consider this work to be important in promoting a science- and pragmatic approach to managing low-level residues that may arise despite good manufacturing and agricultural practices.</p> <p>However, New Zealand is a little concerned that because of the currently narrow definition of “unavoidable and unintentional residues of veterinary drugs” the application of the current guidelines is restricted to just to the unavoidable and unintentional residues of veterinary drugs during animal feed manufacture and does not cover the other pathways that are highlighted in CXC 54-2004 Code of Practice on Good Animal Feeding.</p> <p>New Zealand particularly supports:</p> <ul style="list-style-type: none"> • The recognition that such residues may be unavoidable at low levels; • The application of risk-based decision-making frameworks that consider all relevant exposure pathways; and • Provisions that support proportionate regulatory responses. <p>To improve clarity and facilitate implementation, New Zealand encourages:</p> <ul style="list-style-type: none"> • Acknowledgement that the Code of Practice on Good Animal Feeding encompasses the full feed supply chain, including manufacturing as well as on-farm activities, and recognises that hazards may arise at multiple points. New Zealand is aware of instances where procurement, handling, storage, and distribution have contributed to residue occurrences; 	New Zealand

COMMENT	MEMBER / OBSERVER
<ul style="list-style-type: none"> • Clearer articulation of the decision-making criteria to be applied by competent authorities; • Further distinction between food safety risk and technical non-compliance; • Alignment with existing Codex texts and WTO SPS principles to ensure that measures are not more trade-restrictive than necessary; and • Consideration of the practical capabilities of regulatory authorities and laboratories when applying the guideline. <p>With these considerations, New Zealand supports advancement of this guideline to adoption.</p>	
<p>UAE supports the adoption of the guidelines providing competent authorities with a clear, practical, and science-based framework to manage residues resulting from unavoidable and unintentional carryover of veterinary drugs in animal feed. Additionally, the Risk Management Decision Tool (RMDT) enables rapid and transparent food safety assessments without resorting to unjustified zero-tolerance approaches that disrupt trade and contribute to food waste.</p>	United Arab Emirates
<p>The United States supports final adoption of the Guidelines on recommended risk-based actions to address the detection of residues of a veterinary drug in food caused by unavoidable and unintentional carryover of veterinary drugs in animal feed, where there is no applicable Codex MRL.</p>	USA

REQUEST FOR COMMENTS AT STEP 5/8 ON THE ACTION LEVELS FOR NICARBAZIN AND LASALOCID IN CHICKEN EGGS

COMMENT	MEMBER / OBSERVER
<p>Chile apoya el avance de las siguientes normas y textos a Trámite 5/8:</p> <p>3. Niveles de acción para residuos de nicarbazina y lasalocid en huevos de gallina</p> <p>No se tienen comentarios y se apoya el avance.</p>	Chile
<p>Action levels for nicarbazin and lasalocid in chicken eggs , we do not object to the progress of the proposed action levels for residues of nicarbazin and lasalocid in chicken eggs to step 5/8 for adoption due to unavoidable and unintentional carryover in feed, without prejudice to the position that Egypt may take in the future in the Egyptian national legislation and food regulations it issues regarding this substance</p>	Egypt
<p>Indonesia supports the adoption of action levels for nicarbazin and lasalocid in chicken eggs at Step 5/8.</p>	Indonesia
<p>3. Action levels for nicarbazin and lasalocid in chicken eggs</p> <p>New Zealand supports the establishment of action levels for nicarbazin and lasalocid in chicken eggs.</p> <p>We recognise that action levels can provide useful risk management tools where residues may occur due to factors such as feed cross-contamination, and where the establishment of MRLs may not be appropriate.</p> <p>New Zealand notes the importance of:</p> <ul style="list-style-type: none"> •Clearly distinguishing action levels from MRLs to avoid confusion in interpretation and application; •Ensuring that the action levels are supported by appropriate toxicological assessment and are protective of consumer health; and • Providing clarity on the intended use of action levels, including the regulatory responses that may be triggered when they are exceeded. <p>New Zealand also emphasises the importance of ensuring that analytical methods are available and fit for purpose to support monitoring and enforcement.</p> <p>Subject to these considerations, New Zealand supports adoption of these action levels.</p>	New Zealand
<p>UAE supports the adoption of the action levels of 350 µg/kg for nicarbazin and 150 µg/kg for lasalocid in chicken eggs. Noting that these guidelines are the first Codex action levels established for veterinary drug residues in food resulting from unavoidable and unintentional feed carryover and that result from a robust JECFA scientific assessments, UAE considers them to be a significant milestone for Codex standard-setting.</p>	United Arab Emirates
<p>The United States supports final adoption of the action levels for nicarbazin and lasalocid in chicken eggs.</p>	USA