JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX ALIMENTARIUS COMMISSION

Forty-fourth Session

COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 25TH SESSION OF THE CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

BACKGROUND

This document compiles the comments on the draft standards submitted at Step 8 or Step 5/8 and the proposed draft standards submitted at Step 5 of the Procedure. The comments are those received through the Codex Online Commenting Systems (OCS), or via email by the time this document was issued. The comments are as shown in Appendix I.

OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised 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.

EXPLANATORY NOTES ON APPENDIX I

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 country or observer)

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1 This document compiles comments submitted through OCS, or via email by the time this document was issued, in reply to CL 2021/75-RVDF
### Appendix I

**Comments in regard to: maximum residue limits for residues of veterinary drugs in foods (At Steps 8, 5/8 and 5).**

**In reply to CL 2021/75-RVDF**

**Comments of:** Chile, Costa Rica, Cuba, Egypt, European Union, India, Indonesia, Kenya, Panama, Uganda, HealthforAnimals

<table>
<thead>
<tr>
<th>COMMENT</th>
<th>MEMBER / OBSERVER</th>
</tr>
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<tbody>
<tr>
<td>Se apoya el avance de los LMRs para Flumetrina, Diflubenzuron, Halquinol e Ivermectina, según lo expresado en los párrafos 39, 43, 50 y 59 y apéndice II del reporte de la 25°CCRVDF. No se apoya la retención de Clorhidrato de Zipaterol en trámite 4, indicado en el apéndice II del reporte.</td>
<td>Chile</td>
</tr>
<tr>
<td>Costa Rica would like to thank the Gte and RVDF for the work done. We would also like to confirm that the proposed MRLs indicated in this document are ready for adoption.</td>
<td>Costa Rica</td>
</tr>
<tr>
<td>Cuba agradece la oportunidad de responder la CL 2021/75-RVDF y apoya los LMR de medicamentos veterinarios en alimentos porpuestos.</td>
<td>Cuba</td>
</tr>
<tr>
<td>Egypt agrees the adoption of the following proposed maximum residue limits for veterinary drugs in foods: - flumethrin in (honey) (for adoption at step 5/8) - diflubenzuron in (salmon - muscle plus skin in natural proportion) (for adoption at step 5/8) - ivermectin in (sheep, pigs and goats – fat, kidney, liver and muscle) (for adoption at step 5). Egypt would like to express reservation on adoption of maximum residue limits for halquinol in (swine - muscle, skin plus fat, liver and kidney) (for adoption at step 5/8)</td>
<td>Egypt</td>
</tr>
<tr>
<td>Maximum residue limits for halquinol: The European Union (EU) would like to reiterate its reservation to the adoption of the proposed draft MRLs for halquinol. Halquinol is an antimicrobial agent, which is indicated for use in pigs and poultry as a growth promoter and for controlling diarrhea. The EU emphasises that the use of antimicrobial agents, including halquinol, is not authorised in the EU for growth promotion and recalls that the use of antimicrobials for growth promotion does not correspond to a prudent use of antimicrobials, which is necessary to fight antimicrobial resistance. Maximum residue limits for ivermectin: The European Union (EU) supports the adoption of Standard at step 5 while noting that the draft MRLs for ivermectin will be reviewed at the next session of CCRVDF on the basis of a JECFA re-evaluation.</td>
<td>European Union</td>
</tr>
<tr>
<td>India supports the adoption of MRLs for veterinary drugs in foods.</td>
<td>India</td>
</tr>
<tr>
<td>Indonesia support the adoption of MRL for Flumethrin in Honey at step 8 and Diflubenzuron in Salmon at 5/8. Indonesia agrees on the adoption of MRL for Halquinol and Ivermectin, when they are used solely for treatment purposes. The use of these antimicrobials in feed as growth promoter is prohibited according to Indonesia’s regulation.</td>
<td>Indonesia</td>
</tr>
<tr>
<td>Kenya supports the adoption of MRLs for veterinary drugs in foods by CAC44</td>
<td>Kenya</td>
</tr>
<tr>
<td>Panama supports the advancement of the documents to the next step, and wishes to express our appreciation for the work carried out by JECFA.</td>
<td>Panama</td>
</tr>
</tbody>
</table>
Panamá apoya el avance de los documentos al siguiente trámite, y desea expresar nuestro reconocimiento al trabajo realizado por JECFA.

i. **Paragraph 39**
   Uganda is in agreement with advancement of the MRL of “unnecessary” for flumetrin in honey for adoption at Step 8, since the amount of residues resulting from the use this compound as an insecticide in accordance with GVP is very low or not detectable, and unlikely to pose a risk to human health.

ii. **Paragraph 43**
   Uganda is in agreement with the adoption of the MRL for diflubenzuron (salmon - muscle plus skin in natural proportion) at Step 5/8.

iii. **Paragraph 50**
   Uganda is in agreement with the adoption at Step 5/8 of the MRLs for halquinol (swine - muscle, skin plus fat, liver and kidney) if it is used as an antimicrobial for only therapeutic purposes.

iv. **Paragraph 59**
   Uganda is in agreement with the adoption at step 5 of the MRLs for ivermectin (sheep, goats, pigs – fat, kidney, liver and muscle).

**Comments Submitted by HealthforAnimals**

The proposed draft MRLs at Step 5/8 for halquinol (in swine muscle, skin plus fat, kidney, and liver) were evaluated and recommended by the 88th JECFA (2019). The 25th Codex Committee on Residues of Veterinary Drugs in Food (CCRVDF) reviewed the JECFA evaluation and agreed to submit the proposed draft standards to the Codex Commission for final adoption at Step 5/8.

CCRVDF recommended Maximum Residue Limits (MRLs) in swine of 40 μg/kg for muscle, 350 μg/kg for skin plus fat, 500 μg/kg for liver and 9000 μg/kg for kidney. These are appropriate and we concur with the recommendation.

HealthforAnimals requests countries support final adoption of the standards for halquinol.

The proposed standards meet all the procedural and scientific requirements for the establishment of standards by the Codex Alimentarius Commission. HealthforAnimals observes that halquinol is an important tool in combatting antimicrobial resistance because it is a therapeutic non-medically important antimicrobial for the control and treatment of bacterial enteritis (scours, diarrhea) caused by *E. coli* in swine. HealthforAnimals respectfully requests delegations support the adoption of standards for halquinol.