CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 3 **CX/GP 14/28/3**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON GENERAL PRINCIPLES

Twenty-eighth Session

Paris, France, 7–11 April 2014

REVIEW OF RISK ANALYSIS TEXTS OF DIFFERENT COMMITTEES: CCRVDF

Prepared by the Codex Secretariat

Background

1. The 19th Session of the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF19) considered the request of the CAC33 to review its policy and principles for risk analysis as to their applicability to animal feeding and the review of the risk analysis policies of Codex committees (CL 2010/1-GP), which was forwarded by CCGP26. The CCRVDF agreed to considered the review in the context of its discussion on the revision of policies for the establishment of MRLs and an policy and procedures for veterinary drugs with no ADI and/or MRLs and to integrate all the decision in in the revision of the *Risk Analysis Principles Applied by the CCRVDF* and the *Risk Assessment Policy in the setting of Maximum Limits for Residues of Veterinary Drugs in Food.*[1]

2. CCRVDF20 completed the revision of the two documents and decided that further work was needed on the "concern form" and on the development of a risk analysis policy on extrapolation of MRLs of Veterinary Drugs to Additional Species and Tissues for inclusion in the Procedural Manual.[2]

3. CAC35 adopted the revision of the Risk Analysis Principles Applied by the CCRVDF and of the Risk Assessment Policy for Residues of Veterinary Drugs in Foods as proposed by the CCRVDF20 and noted that the CCGP could review the document for consistency at its next session.[3]

4. CCRVDF21 completed work on the provisions for extrapolation and on the use of a Concern Form, which were forwarded to the CAC37 for adoption through the CCGP (see Agenda Item 2).[4]

5. CCRVDF21 also agreed that a brief text should be inserted in its Risk Analysis Principles to address the establishment of MRLs for honey to the effect that CCRVDF may "Consider recommending MRLs for honey using alternative approaches in accordance with the guidance established by JECFA" and to consider a draft at its next Session in the light of the outcome of the 78th JECFA discussion on this matter.[5]

6. The Appendix presents the *Risk Analysis Principles Applied by the CCRVDF* and the *Risk Assessment Policy in the setting of Maximum Limits for Residues of Veterinary Drugs in Food,* as revised by CCRVDF20 and 21.

[1] REP11/RV paras 13 and 141
[2] REP12/RV paras 79-80 and 158 and Appendices VII and IX
[3] REP12.CAC paras 25-26 and Appendix II
[4] REP14/RVDF paras 104 and 121 and Appendices VIII and IX
[5] REP14/RVDF paras 140

Recommendations

7. In view of the ongoing work in CCRVDF on the establishment of MRLs in honey and the status of the of the revision of the *Risk Analysis Principles applied by the Committee on Pesticide Residues* (CCPR), which should be completed by CCPR46, the Codex Secretariat recommends to:

i. endorse the amendments proposed by CCRVDF21 (see Appendix); and

ii. consider the consistency of the risk analysis principles applied by all the different committees when the above texts will be finalized. If the Committee agrees, the Codex Secretariat could prepare a document analysing the consistency of all the Risk Analysis Principles of the different committees to facilitate the discussion at CCGP29.

Appendix

RISK ANALYSIS PRINCIPLES APPLIED BY THE CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Note:

Changes made by CCRVDF20 are presented in Underlined and ~~strikethrough~~ font

Changes made by CCRVDF21 and to be considered by CCGP endorsement are presented in Underlined and ~~strikethrough~~ and additionally highlighted in grey.

1 - Purpose – Scope

1. The purpose of this document is to specify Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods. This document should be read in conjunction with the Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius.

2 - Parties involved

2. The Working Principles for Risk Analysis for application in the framework of the Codex Alimentarius has defined the responsibilities of the various parties involved. The responsibility for providing advice on risk management concerning residues of veterinary drugs lies with the Codex Alimentarius Commission and its subsidiary body, the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF), while the responsibility for risk assessment lies primarily with the Joint FAO/WHO Expert Committee on Food Additives (JECFA).

~~1. According to its mandate, the responsibilities of the CCRVDF regarding veterinary drug residues in food are:~~

~~(a) to determine priorities for the consideration of residues of veterinary drugs in foods;~~

~~(b) to recommend maximum residue limits (MRLs) for such veterinary drugs;~~

~~(c) to develop codes of practice as may be required;~~

~~(d) to consider methods of sampling and analysis for the determination of veterinary drug residues in foods.~~

3. The CCRVDF shall base its risk management recommendations in relation to MRLs to the Codex Alimentarius Commission on JECFA's risk assessments of veterinary drugs. ~~in relation to proposed MRLs~~.

4. The CCRVDF is primarily responsible for recommending risk management proposals for adoption by the Codex Alimentarius Commission.

5. JECFA is primarily responsible for providing independent scientific advice, the risk assessment, upon which the CCRVDF base their risk management decisions. It assists the CCRVDF by evaluating the available scientific data on the veterinary drug prioritised by the CCRVDF. JECFA also provides advice directly to FAO and WHO and to Member governments.

6. Scientific experts from JECFA are selected in a transparent manner by FAO and WHO under their rules for expert committees on the basis of the competence, expertise, experience in the evaluation of compounds used as veterinary drugs and their independence with regard to the interests involved, taking into account geographical representation. ~~where possible~~

3 - Risk Management in CCRVDF

7. Risk management should follow a structured approach including:

- Preliminary risk management activities;
- Evaluation of risk management options; and
- Monitoring and review of decisions taken.

8. The decisions should be based on risk assessment, and take into account, where appropriate, other legitimate factors relevant for the health protection of consumers and for fair practices in food trade, in accordance with the *Criteria for the Consideration of the Other Factors Referred to in the Second Statement*

of Principles[6].

3.1 - Preliminary risk management activities

9. This first phase of risk management covers:

- Establishment of risk assessment policy for the conduct of the risk assessments;
- identification of a food safety problem ;
- establishment of a preliminary risk profile;
- ranking of the hazard for risk assessment and risk management priority;
- Commissioning of the risk assessment.
- ; and Consideration of the of the risk assessment.

3.1.1 - Risk Assessment Policy for the Conduct of the Risk Assessment

10. The responsibilities of the CCRVDF and JECFA and their interactions along with core principles and expectations of JECFA evaluations are provided in *Risk Assessment Policy for the Setting Residues of MRLs Veterinary Drugs in Food*, established by the Codex Alimentarius Commission.

3.1.2 - Establishment of Priority List

11. The CCRVDF identifies, with the assistance of Members, the veterinary drugs that may pose a consumer safety problem and/or have a potential adverse impact on international trade. The CCRVDF establishes a priority list for assessment by JECFA.

12. In order to appear on the priority list of veterinary drugs for the establishment of a MRL, the proposed veterinary drug shall meet some or all of the following criteria:

- A Member has proposed the compound for evaluation (a template for information recommended for consideration in the priority list by Codex Committee on Residues of Veterinary Drugs in Foods has been completed and be available to the Committee);
- A Member has established good veterinary practices with regard to the compound;
- The compound has the potential to cause public health and/or international trade problems;
- It The compound is available as a commercial product; and
- There is a commitment that a dossier will be made available.

13. The CCRVDF takes into account the protection of confidential information in accordance with WTO Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS) - Section 7: Protection of Undisclosed Information - Article 39, and makes every effort to encourage the willingness of sponsors to provide data for JECFA assessment.

3.1.3 - Establishment of a Preliminary Risk Profile

14. Member(s) request(s) the inclusion of a veterinary drug on the priority list. The available information for evaluating the request shall be provided either directly by the Member(s) or by the sponsor. A preliminary risk profile shall be developed by the Member(s) making the request, using the template presented in the Annex.

15. Where CCRVDF considers the possible extrapolation of MRLs to other species, this should be clearly identified in the preliminary risk profile. Pre requisites include:

- Comprehensive data packages or established MRLs for the veterinary drug are available for at least one animal species.
- The drug is approved for use in the species for which MRL extrapolation is requested in at least one member country and Good Veterinary Practice has been established;

16. The CCRVDF considers the preliminary risk profile and makes a decision on whether or not to include the veterinary drug in the priority list.

[6] Statements of Principle concerning the Role of Science in the Codex Decision-making Process and the Extent to which other Factors are taken into Account (Codex Procedural Manual).

3.1.4 - Ranking of the Hazard for Risk Assessment and Risk Management Priority

17. The CCRVDF establishes an ad-hoc Working Group open to all its Members and observers, to make recommendations on the veterinary drugs to include into (or to remove from) the priority list of veterinary drugs for the JECFA assessment. The Working Group also develops and recommends to CCRVDF the questions to be answered by the JECFA Risk Assessment. The CCRVDF considers these recommendations before agreeing on the priority list, taking into account pending issues~~such as temporary Acceptable Daily Intakes (ADIs) and/or MRLs.~~. In its report, the CCRVDF shall specify the reasons for its choice and the criteria used to establish the order of priority.

~~Prior to development~~

18. The CCRVDF forwards the agreed priority list of ~~MRLs for new~~ veterinary drugs ~~not previously evaluated by~~ for the JECFA , ~~a proposal for this work shall be sent~~ assessment to the Codex Alimentarius Commission ~~with a request for approval as~~ for new work in accordance with the *Procedures for the Elaboration of Codex Standards and Related Texts*.

3.1.5 - Commissioning of the Risk Assessment

19. After approval by the Codex Alimentarius Commission of the priority list of veterinary drugs as new work, the CCRVDF forwards it to JECFA with the qualitative preliminary risk profile as well as specific guidance on the CCRVDF risk assessment request. JECFA, WHO and FAO experts then proceed with the assessment of risks related to these veterinary drugs, based on the dossier provided and/or all other available scientific information. CCRVDF may also refer risk management options, with a view toward obtaining JECFA's guidance on the attendant risks and the likely risk reductions associated with each option.

3.2 - Consideration of the Result of the Risk Assessment

20. When the JECFA risk assessment is completed, a detailed report is prepared for the subsequent session of the CCRVDF for consideration. This report shall clearly indicate the choices made during the risk assessment with respect to scientific uncertainties and the level of confidence in the studies provided.

21. When the data are insufficient, JECFA may recommend temporary MRL on the basis of a temporary ADI using additional safety considerations. If JECFA cannot propose an ADI and/or MRLs due to lack of data, its report should clearly indicate the gaps and a timeframe in which data should be submitted.~~, in order to allow Members to make an appropriate risk management decision.~~ Temporary MRLs may proceed through the Step process but should not be advanced to Step 8 for adoption by the Codex Alimentarius Commission until JECFA has completed the evaluation.

22. The JECFA assessment reports related to the concerned veterinary drugs should be made available in sufficient time prior to a CCRVDF meeting to allow for careful consideration by Members. If this is, in exceptional cases, not possible, a provisional report should be made available.

23. JECFA should, if necessary, ~~propose~~ assess different risk management options~~. In consequence, JECFA should~~ and present, in its report, different risk management options for the CCRVDF to consider. The reporting format should clearly distinguish between the risk assessment and the evaluation of the risk management options

24. The CCRVDF may ask JECFA for any additional explanation.

25. Reasons, discussions and conclusions (or the absence thereof) on risk assessment should be clearly documented, in JECFA reports, for each option reviewed. The risk management decision taken by the CCRVDF (or the absence thereof) should also be fully documented.

26. A delegation may ask JECFA for additional explanation on the scientific concerns, which will be put forward to JECFA by using the Concern Form (see Section 3.3).

3.3 - Using the Concern Form

27. The Concern Form is an additional tool for Members to bring scientific concerns to the attention of JECFA concerning its risk assessment.

28. Procedure for the use of the Concern Form:

- All Concern Forms and supporting documentation should be submitted to the JECFA and Codex Secretariats by Members on the proposed MRLs circulated for comments at Step 3 or later in the Step Procedure, preferably as part of Members comments on the proposed MRLs, or at the latest one month after the CCRVDF session, by using the template recommended in Annex 2.

- Scientific concerns that could not be addressed at the Session of the CCRVDF will be described in the Concern Form and made available for a JECFA review with supporting documentation;
- Submission of Concern Form prior to the CCRVDF Session might allow JECFA Secretariat to prepare clarification in response to some concerns during the Session;
- Concerns related to interpretation of the existing data (e.g. review of the ADI) can be submitted without the need for any additional data;
- If the concern is entered at Step 3 and cannot be addressed at the Session, the specific MRLs will not advance beyond Step 5. If the concern is entered at Step 6, the specific MRLs will not advance beyond Step 7;
- Identical concerns should be considered only once by JECFA;
- The JECFA Secretariat should schedule the concern for a JECFA review as soon as possible to allow JECFA to respond by the next CCRVDF Session.

3.4 - Evaluation of Risk Management Options

29. The CCRVDF shall proceed with a critical evaluation of outcomes of the JECFA risk assessment including the proposals on MRLs and may consider other legitimate factors relevant for health protection and fair trade practices in the framework of the risk analysis. According to the 2nd Statement of principle, the criteria for the consideration of other factors should be taken into account. These other legitimate factors are those agreed during the 12th Session of the CCRVDF [7] and subsequent amendments made by this Committee.

30. The CCRVDF ~~either recommends~~ may:

- Recommend the MRLs ~~as proposed by~~ based on the JECFA, ~~modifies them~~assessment;
- Recommend extrapolation of MRLs to one or more other species, where JECFA has identified that is scientifically justifiable and the uncertainties have been clearly defined;
- Modify the MRLs in consideration of other legitimate factors~~, considers other measures or asks JECFA~~ relevant to the health protection of consumers and for reconsideration of the residue the promotion of fair practices in food trade;
- Request JECFA to reconsider the evaluation for the veterinary drug in question;
- Decline to advance the MRLs based on risk management concerns consistent with the Risk Analysis Principles of the Codex Alimentarius and the recommendations provided by JECFA .
- Develop risk management guidance, as appropriate, for veterinary drugs for which JECFA has not been able to establish an ADI and/or to recommended a MRL, including those with specific human health concern. As a result of this consideration, the CCRVDF may refer a range of risk management options to JECFA to obtain guidance on the attendant risks and likely risk reductions.

31. Particular attention should be given to availability of analytical methods used for residue detection.

3.4 - Monitoring and Review of the Decisions Taken

32. Members may ask for the review of decisions taken by the Codex Alimentarius Commission. To this end, veterinary drugs should be proposed for inclusion in the priority list. In particular, review of decisions may be necessary if they pose difficulties in the application of the *Guidelines for the Design and Implementation of National Regulatory Food Safety Assurance Programme Associated with the Use of Veterinary Drugs in Food Producing Animals* (CAC/GL 71-2009).

33. The CCRVDF may request JECFA to review any new scientific knowledge and other information relevant to risk assessment and concerning decisions already taken, including the established MRLs. The CCRVDF should review and update standards or related texts for veterinary drugs in food, as necessary, in the light of new scientific information.

34. The risk assessment policy for MRL shall be reconsidered based on new issues and experience with the risk analysis of veterinary drugs. To this end, interaction with JECFA is essential. A review may be undertaken of the veterinary drugs appearing on prior JECFA agendas for which no ADI or MRL has been recommended.

[7] ALINORM 01/31, par.11

4 - Risk Communication in the Context of Risk Management

35. In accordance with the Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius, the CCRVDF, in cooperation with JECFA and the Codex Secretariat, shall ensure that the risk analysis process is fully transparent and thoroughly documented and that results are made available in a timely manner to Members. The CCRVDF recognises that communication between risk assessors and risk managers is critical to the success of risk analysis activities.

36. In order to ensure the transparency of the assessment process in JECFA, the CCRVDF provides comments on the guidelines related to assessment procedures being drafted or published by JECFA.

ANNEX 1

TEMPLATE FOR INFORMATION ~~NECESSARY~~ RECOMMENDED FOR ~~PRIORITIZATION~~ CONSIDERATION IN THE PRIORITY LIST BY CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Administrative information

1. Member(s) submitting the request for inclusion
2. Veterinary drug names
3. Trade names
4. Chemical names and CAS registry number
5. Names and addresses of basic producers

Purpose, scope and rationale

6. Identification of the food safety issue (residue hazard)
7. Assessment against the criteria for the inclusion on the priority list

Risk profile elements

8. Justification for use
9. Veterinary use pattern, including information on approved uses if available
10. Commodities for which Codex MRLs are required

Risk assessment needs and questions for the risk assessors

~~1. Identify the feasibility that such an evaluation can be carried out in a reasonable framework~~

11. Specific request to risk assessors

Available information[1]

12. Countries where the veterinary drugs ~~is~~ are registered
13. National/Regional MRLs or any other applicable tolerances
14. List of data (pharmacology, toxicology, metabolism, residue depletion, analytical methods) available

Timetable

15. Date when data could be submitted to JECFA.

[1] When preparing a preliminary risk profile, Member(s) should take into account the updated data requirement, to enable evaluation of a Veterinary drug for the establishment of an ADI and MRLs, published by JECFA

ANNEX 2

TEMPLATE FOR CONCERN FORM

- Submitted by: (name of the delegation)
- Date:
- Veterinary drug:
- Commodity (species and tissues):
- MRL (mg/kg):
- Present Step:
- Description of the concern:
- Summary of the supporting documentation that will be submitted to JECFA (e.g. toxicology, residue, microbiology, dietary exposure assessment):

RISK ASSESSMENT POLICY FOR ~~THE SETTING OF MAXIMUM LIMITS FOR~~ ***RESIDUES OF VETERINARY DRUGS IN FOODS***

Role of JECFA

1. The Joint FAO/WHO Expert Committee on Food Additives (JECFA) is an independent scientific expert body convened by both Directors-General of FAO and WHO according to the rules of both organizations, charged with the task to provide scientific advice on veterinary drug residues in food.

2. This annex applies to the work of JECFA in the context of Codex and in particular as it relates to advice requests from the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF).

(a) JECFA provides CCRVDF with science-based risk assessments conducted in accordance with the Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius and incorporating the four steps of risk assessment. JECFA should ~~continue to~~ use its risk assessment process for establishing **acute reference doses (*ARfD*) or** Acceptable Daily Intakes (ADIs) and proposing Maximum Residues Limits (MRLs), **and/or responding to other questions from the CCRVDF.**

(b) JECFA should take into account all available scientific data and assessment~~s~~ in conducting the risk assessment. It should use available quantitative information to the greatest extent possible and also qualitative information.

(c) Constraints, uncertainties and assumptions that have an impact on the risk assessment ~~need~~ **should** be clearly communicated by JECFA.

(d) JECFA should provide CCRVDF with information on the applicability, public health consequences and any constraints of the risk assessment to the general population and to particular sub-populations and, as far as possible, should identify potential risks to specific groups of populations of potentially enhanced vulnerability (e.g. children).

(e) Risk assessment should be based on realistic exposure scenarios.

(f) When the veterinary drug is used both in veterinary medicine and as a pesticide, a harmonised approach between JECFA and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR) should be followed.

(g) MRLs, that are compatible with the ADI ~~should be set for all species~~ **or *ARfD*, where appropriate, should be recommended for target animal tissues (e.g. muscle, fat, or fat and skin, kidney, liver), and specific food commodities (e.g. eggs, milk, honey) originating from the target animals species to which a veterinary drug can be administered according to good veterinary practice** based on appropriate consumption figures. When requested by CCRVDF, extension of MRLs between species will be considered if appropriate data are available.

(h) While considering extrapolation of MRLs:

- **There should be a reasonable expectation that two food producing species that are biologically/physiologically related will generally exhibit a similar pattern of metabolism, distribution and depletion of veterinary drug residues (e.g., ruminant to ruminant).**
- **There should be a reasonable probability that a unique metabolite(s) of toxicological concern is unlikely to occur in species in which MRLs are being extrapolated;**
- **JECFA should, when requested, assess different risk management options and present, in its report the implications of these different risk management options for the CCRVDF to consider.**

(i) When scientific data are insufficient to complete an evaluation, JECFA should indicate the data gaps and propose a timeframe in which data should be submitted. JECFA may also recommend guidance according to point 10 of the *Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius*.

Data Protection

3. Considering the importance of intellectual property in the context of data submission for scientific evaluation, JECFA has established procedures to cover the confidentiality of certain data submitted. These procedures enable the sponsor to declare which data is to be considered as confidential. The procedure includes a formal consultation with the sponsor.

Expression of risk assessment results in terms of MRLs

4. MRLs have to be established for **relevant** target animal tissues (e.g. muscle, fat, or fat and skin, kidney, liver), and specific food commodities (e.g. eggs, milk, honey) originating from the target animals species to which a veterinary drug can be administered according to good veterinary practice.

5. However, if residue levels in various target tissues are very different, JECFA is requested to consider MRLs for a minimum of two. In this case, the establishment of MRLs for muscle or fat is preferred to enable the ~~control~~ **verification** of the **compliance** of ~~carcasses~~ **food of animal origin** moving in international trade.

6. When the calculation of MRLs to be compatible with the ADI may be associated with a lengthy withdrawal period, JECFA should clearly describe the situation in its report.

7. **JECFA should provide a clear explanation and rationale for its conclusions and recommendations. This is particularly important when no ADI can be established and/or no MRLs can be recommended due to data gaps or because of specific public health concerns, or when JECFA recommends withdrawal of MRLs or ADI.**