codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 10 **CX/RVDF 03/9-Add. 1**
February 2003

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS
Fourteenth Session
Arlington, Virginia, 4 - 7 March 2003

DISCUSSION PAPER ON RESIDUES ISSUES FOR THE CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Comments have been received from Australia and the European Community

AUSTRALIA

Australia is pleased to provide the following comments in response to the Discussion Paper on Residues Issues, which is to be discussed under Agenda Item 10 at the

14th Session of the Codex Committee on Residues of Veterinary Drugs in Foods.

General Comments:

No mention is made in this paper of some other options which have been proposed during previous considerations on this matter.

- the concept of harmonising national and JECFA data formats;
- the concept of JECFA undertaking parallel assessments with national agencies when a (new) product is proposed for marketing in one (major) country; and
- individual countries (the EU or others) making the data they hold (with the approval of the sponsor) and their local assessments available to JECFA to speed the process.

The following specific comments are provided.

Paragraph 5

Line 5, the end of the sentence should also refer to the "prioritization of compounds for review" in line with the minutes of CCRVDF 13.

Headings should be added to the paragraphs to clarify that they deal with different issues, as suggested below.

Para 7 – Statements of Principle

This paragraph could usefully acknowledge the draft recommendations of the *Report of the Evaluation of the Codex Alimentarius and other FAO and WHO food standards work.* However, this does not mean they should be agreed to as published.

Paragraph 8 – ***(editorial suggestions only)***

line 1 Committee~~,~~ to rigorously abide ~~to~~ by the statements

line 8 will ~~serve~~ enable the Committee ~~well~~ to

Paragraph 9 – Identifying Priorities for Developing Countries

Paragraph 10 – Establishing Priorities

line 4 reverse the reference to member governments or other sponsors (sponsors are the main issue)

line 8 ~~that~~ commitment

line 9 specific priority consideration

This paragraph contains some motherhood statements, but does not really add much to the document. How is the WG to "propose guidance or recommendations"? How are developing countries to get packages together if the basic data (on old products) is not there? Who will pay if basic work is needed? It is important that some suggestions in these areas go into the paper.

Paragraph 11 – Antimicrobial considerations

The intent of this paragraph is unclear, and it requires redrafting to clarify. Perhaps it is intended to say that old products should not need to take into account new microbiological assessments?

Paragraph 12 – Intellectual Property Rights

In the last sentence, is it enough that the sponsor is "made aware" of the request, or should they be allowed to consider and comment on it? IFAH comments in this regard will be important?

Paragraph 13 – Co-ordination with CCPR/JMPR and Interim MRLs

This Paragraph suggests that "the Committee ought to keep apprised of this work and consider other appropriate alternatives…". However there is no suggestion that it consider adopting any recommendations coming from CCPR (such as interim MRLs). This suggestion should be added. Also "apprised of" is a transitive use, and others can keep the Committee apprised, but it cannot keep itself apprised, therefore another term is needed, eg "informed about".

Paragraph 14

This paragraph appears to add nothing to this paper, and should be deleted. If it is to be retained, at least make the following corrections:

line 2 CCRVDF's activities are ~~has its specific needs~~ related to

line 4 different ~~than~~ from those

last sentence add a reference to the problems of trade in those commodities as well.

Paragraph 15 – Scheduling of Meetings

Second Paragraph 15 – should be **Paragraph 16**

Paragraph 16 – should be **Paragraph 17**

EUROPEAN COMMUNITY

The European Community would like to thank the United States of America for the preparation of this discussion paper. It addresses issues discussed at the 13th session of the CCRVDF on the basis a discussion paper related to concerns previously raised in the CCRVDF as to delays in the progress of the work by the Committee in the establishment of maximum residue limits. Particular reference was made to the needs of the developing countries for the development of standards for compounds used in those countries.

The issues of the progress of the work of the Codex Alimentarius and the Codex process as a whole has recently been subject to a complete evaluation and the recommendations made in the evaluation report also include possible solutions to address the needs of developing countries.

In the discussion paper it is stated that the proposals should not overlap the discussion on the future policy on risk management methodologies including risk assessment policies (agenda item 9, document CX/RVDF 03/8). However, proposals are put forward on the main issues relating to the prioritization of substances, submission of dossiers, the quality of the data in the dossiers and the timeliness and consistency of assessment by JECFA. According to the European Community, the discussion on these topics should be referred to the discussion on CX/RVDF 03/8.

Pending decisions by the CAC on new working methods for the committees and intensified involvement of developing countries in the process of development of standards, the CCRVDF should focus on the risk management methodologies including risk assessment policies to be employed as well as the revision of the guidelines for the establishment of a regulatory programme for control of veterinary drug residues in foods (CX/RDVF 03/7).