



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS**

**Twentieth Session**

*San Juan, Puerto Rico, 7-11 May 2012*

**PROPOSED AMENDMENTS TO THE TERMS OF REFERENCE OF CCRVDF**

**Comments of European Union, Iran, Kenya, Philippines, United States of America and IACFO  
to CL 2010/47-RVDF, part C (point 4)**

**EUROPEAN UNION**

CCRVDF must be able to elaborate other risk management measures than MRLs and codes of practice. This is of particular importance to address substances with no ADI and/or MRLs. Therefore, the Member States of the European Union support the proposed amendment to the Terms of Reference of CCRVDF as presented in Appendix VIII of REP11/RVDF.

**IRAN**

Please be informed that Iran is agreed with the proposed amendments to the "*Risk Analysis Principles applied by Codex Committee on Residues of Veterinary Drugs in Foods*" related to CL 2010/47-RVDF- Part C-3 and also proposed Amendments to the "Terms of Reference of the Codex Committee on Residues of Veterinary Drugs in Foods" related to CL 2010/47-RVDF- PartC-4 .

**KENYA**

**Issues and observations**

AECRVDF agrees with the proposed TOR including the amendment (e): 'to consider other matters in relation to the safety of food and feed containing residues of veterinary drugs.'

The amendment will further address the food safety risks arising from the use of medicated animal feeds, (that is, feeds containing antimicrobials and growth promoters)

**Comments**

Additional amendment is proposed as follows :

To develop a programme which will assist developing countries to implement national plans of monitoring veterinary drugs residues in foods

**PHILIPPINES**

**Terms of Reference:**

- a) To determine priorities for the consideration of residues of veterinary drugs in foods;
- b) To recommend maximum levels of such substances;
- 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;
- e) *To consider other matters in relation to the safety of food ~~and feed~~ containing residues of veterinary drugs;*

Rationale: The current Risk analysis principles were appropriate to allow the Committee to address animal feeding in the framework of its terms of reference and, therefore, it was not necessary to amend them

- f) *To develop risk management and communication recommendations when after assessment of a veterinary drug, the JECFA recommends no ADI and/or MRL due to specific human health concerns.*

Rationale: Japan agrees to add the term (f) which was the proposed term in the paragraph 3 of the Risk of Analysis Principle by the CCRVDF by co-chairpersons of the electronic working group on the revision of the risk analysis principles applied by the CCRVDF and risk assessment policy for the setting of MRL of veterinary drugs on 2 August 2011.

**Proposed Philippine Position:**

1. The existing CCRVDF Terms of Reference from “a to d” do not need to be changed;
2. The addition of Item “e” as proposed by Japan “ to consider other matters in relation to the safety of food containing residues of veterinary drugs “ can be studied at the next session, for this will add flexibility to the current function of the Committee and would thereby accommodate future matters not currently identified but may concern residues of veterinary drugs in foods;
3. Further, considering that CCRVDF is responsible for residues of veterinary drugs in foods as it affect human health, the Philippines is not supporting the inclusion of “feeds” as part of CCRVDF Terms of Reference given that veterinary drugs (if needed) is intentionally added in feeds as one of its components and not residues. Residues are already in the foods.
4. For Item “f”, the Philippines proposes for the possibility of considering the concept later on under Item “e”, but with consideration of readiness of member country in developing and adopting risk management.

**UNITED STATES OF AMERICA**

The United States would like to thank the members of the Committee for the opportunity to comment on this document and for the work; of the Committee at its last session on the Proposed Amendment to the Terms of Reference (TOR).

The United States is not sure that is it necessary to change the current Terms of Reference of the Committee and on reflection we do not believe that there was anything in the discussion at the last session of the Committee that would warrant a need to change the current Terms of Reference.

The proposed addition of the sentence “(e) *to consider other matters in relation to the safety of food and feed containing residues of veterinary drugs*’ appears to be quite broad. This could in fact hinder the efficient operation of the Committee and alter its primary focus away from protecting the health of consumers and ensuring fair practices in the food trade. We believe that committees should be reluctant to change their Terms of Reference if in fact it is unnecessary and should try to avoid overly broad changes that may have unintended consequences.

**IACFO (International Association of Consumer Food Organizations)**

*(e) to consider other matters in relation to the safety of food ~~and feed~~ containing residues of veterinary drugs;*

*(f) to develop risk management and communication recommendations when after assessment of a veterinary drug, the JECFA recommends no ADI and/or MRL due to specific human health concerns.*

**Rationale:** IACFO agrees with the inclusion of both terms (e) and (f). IACFO also supports Japan’s recommended deletion of the words “and feed” from term (e). Term (f) is an important addition to the Committee’s terms of reference. Developing risk management and communication recommendations for drug use and other issues arising from the lack of JECFA recommended ADIs/MRLs will provide member countries with clear guidance on the use of these veterinary drugs based on the best available research. Risk management and communication recommendations on this issue will aid countries in making decisions that offer the greatest public health protection.