



**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 RISK ANALYSIS PRINCIPLES APPLIED BY THE CCRVDF**

**Comments of European Union, Iran, Japan Uruguay and United States of America  
to CL 2010/47-RVDF, part C (point 3)**

**EUROPEAN UNION**

It is important to ensure that CCRVDF covers food safety risks arising from animal feed in its specific area of work while the Task Force on Animal Feeding covers the issue in a more holistic manner. Therefore, the European Union and its Member States support the proposed amendments to the *Risk Analysis Principles Applied by the Codex Committee on Residues of Veterinary Drugs in Foods* as presented in Appendix II 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

**JAPAN**

~~Amendments are proposed only to the following sections. Proposed changes in ***Italics and bold***~~

**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.

***1-bis***

*This document should be read in conjunction with the Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius.*

*[Rationale: Japan agrees to add the term (1-bis) which was proposed 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 MRLs of veterinary drugs on 2 August 2011.]*

~~a) This document also applies to residues of veterinary drugs in food originating from the use of veterinary drugs in feed<sup>†</sup> where it can affect food safety.~~

~~<sup>†</sup>The term "feed" refers to both "feed (feedingstuffs)" and "feed ingredients" as defined in the Code of Practice on Good Animal Feeding (CAC/RCP 054 2004) [Rationale: Please see the rationale provided in 1. a)]~~

*[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. (Refer to the paragraph 10 in the REP11/RVDF)]*

### **3.1 Preliminary risk management activities**

1. 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 ~~*in the integrity of the food chain and determine if feed may be a source of the food safety problem;*~~

*[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. (Refer to the paragraph 10 in the REP11/RVDF)]*

- 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 result of the risk assessment.

### **UNITED STATES OF AMERICA**

The United States does not believe that the current Risk Analysis Principles Applied by the Codex Committee on Residues of Veterinary Drugs in Foods needs to be amended to address animal feeding, as the current Risk Analysis Principles are appropriate to allow the Committee to address animal feeding. The United States does however, support the addition of (1 bis) as proposed by the co-chairs of the electronic Working Group, to draw attention to the fact that the overarching risk analysis principles applied by Codex Alimentarius are applicable to all committees.

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### **URUGUAY**

Uruguay is in agreement with the proposed amendments.