

# C O D E X   A L I M E N T A R I U S   C O M M I S S I O N



Food and Agriculture  
Organization of  
the United Nations



World Health  
Organization

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Agenda Items: 5, 7b, 8a & 9b

CRD 20

Original language only

## 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

### COMMENTS OF INDONESIA

#### AGENDA ITEM 5 - Proposed amendments to the Terms of Reference of CCRVDF (REP11/RVDF App. VIII) with Comment to CL 2010/47-RVDF, part C

Indonesia in the view that the Committee should cover the elaboration of risk management measures other than MRLs and codes of practice. And Indonesia believes that with the additional bullet (e) *to consider other matters in relation to the safety of food and feed containing residues of veterinary drugs*” of the Term of Reference, the Committee may accommodate future matters that concern residues of veterinary drugs in foods. Therefore, Indonesia would like to support the proposed amendment to the Terms of Reference of CCRVDF by addition of bullet (e). However, Indonesia would like to delete the words “*and feed*” from this bullet.

#### AGENDA ITEM 7b - Proposed revision of Risk Analysis Principles applied by the CCRVDF and the Risk Assessment Policy for the setting of maximum limits for residues of veterinary drugs in foods (CX/RVDF12/20/8) dan Comments

Indonesia appreciates the opportunity to support the proposed revision as detailed in the Report of the electronic Working Group on Revision of the *Risk Analysis Principles Applied by the CCRVDF* and the *Risk Assessment Policy for the Setting of Maximum Limits for Residues of Veterinary Drugs in Foods* provided by France, Japan and the United States.

Rationale: Indonesia considers that the proposed revision would help to deepen and clarify the elements of the *Risk Analysis Principles applied by the CCRVDF* and the *Risk Assessment Policy* for the setting of Maximum Residue Limits (MRLs) for residues of veterinary drugs in foods.

#### AGENDA ITEM 8a - Proposed draft Sampling Plans for Residue Control for Aquatic Animal Products and Derived Edible Products of Aquatic Origin (Table C, Annex B of CAC/GL 71-2009) – (CX/RVDF 12/20/9) dan Comments at Step 3

##### Introduction

During the 19<sup>th</sup> session of the CCRVDF Indonesia has submitted information for further consideration as below.

Indonesia collects number of sample based on previous year production volume and also based on the European Union Council Directive No. 96/23/EC, 2002/EC, (EC) 333/2007 and (EC) 1883/2006. Minimum number of incremental samples to be taken as follows:

Minimum number of incremental samples to be taken from the lot/sublot:

Weight or volume of lot/sublot (in Kg/Litre)	Minimum number of incremental samples to be taken
< 50	3
≥50 and ≤500	5
>500	10

- (EC) 333/2007

And according to the Council Directive No. 96/23/E, the requirements are as follows:

1. Requirement for sampling are:

- a. One sample for one substance;
- b. Sample shall mean the quantity of fish/shrimp/product of aquaculture taken from one lot;
- c. Lot shall mean fish:
  - Pond/floating net/cage close to sources of contaminants (near paddy field, residential area, industry area, mining area, highway, seaport, etc.)
  - Pond/floating net/cage that has been treated with fish drugs

2. Defining the sampling

- a. Group A (Substance contains anabolic effect and prohibited) is 1/3 of the total samples.
  - Sample is taken from aquaculture unit;
  - Sample could be taken from each level of aquaculture process
- b. Group B (Fish drugs and contaminants; including unlicensed substances in Fish drugs) is 2/3 of the total samples:
  - Sample is taken from aquaculture unit
  - Sample could be taken in processing units or collectors which fresh condition and could be traced

One sampling shall be taken at minimum of 1 kg and collected from selected points of sampling, if the weight of 1 fish is more than 1 kg then take only the middle part of fish (without head and tail) and do not wash it. Cutting process shall be conducted in the clean room of handling space.

3. Commodity classification in Indonesia based on commodity type, for example: Shrimp (monodon and vannamei), Nile tilapia and milkfish.
4. We have to have scientific review to a number of substances which is required by EU but not necessarily required by International certification body (ACC, and GlobalGAP) and buyer Auditor (Japan, US and European Union), these substances include:

Dimetridazole (A6), Anthelmintic (B2a), Mycotoxin (B3d), Crystal Violet Methylene Blue (B3e)

**Specific comments**

- a. Indonesia supports to forward the options 1a. and 2a. for the “Instruction for collection” of the Table C. However, Indonesia would like to propose changing the minimum quantity required for laboratory sample from 500 g to **250 g** for aquatic animal products, taking into consideration the homogeneity of production and the type of fish, crustacean or shellfish. And for footnote number 1 in in the same Tabel, to add the phrase “*substance to be analyzed*” before the phrase “*and the method of analysis*”.

Rationale:

It is only for testing chloramphenicol and its derivatives using Elisa method requires a 500g sample. Whereas, for the other tests, 250g sample is sufficient.

**AGENDA ITEM 9b - Database on need for MRLs for developing countries**

Indonesia would like to submit the following information in the Table below to included in the **Appendix B: Database of Veterinary Drugs of Potential Interest to Developing Countries**

**Database of Veterinary Drugs of Potential Interest to Indonesia**

Name	Requesting country	Species	Tissues	Good Practice in the Use of Veterinary Drugs (GPVD)	Existing Data & Source	Manufacturer	JECFA evaluation	Codex MRLs	Member country's MRLs	Comments
1. Enrofloxacin 2. Tetracyclin 3. Oxytetracyclin 4. Erythromycin 5. Sulfadiazine 6. Acriflavin 7. Florfenicol 8. Fentin Acetat 9. Dichlorvos 10. Niclosamid 11. Pyrimifosmethyl 12. Rotenone 13. Tetra Cypermetrin	Indonesia	a. Fish : Tilapia, Milkfish b. Shrimp: <i>Penaeus Monodon</i> and <i>P. Vanamei</i>	muscle		No data are available for any tissue	Un known				
	Indonesia	c. (swallow) Bird	nest		No data are available					Indonesia exports to some countries
	Indonesia	d. Honey	honey		No data are available					Indonesia exports and imports