CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 5, 6, 9(a), 10, 11 and 12 **CRD 23**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON VETERINARY DRUGS IN FOODS

20th Session

San Juan, Puerto Rico, 7-11 May 2012

Comments submitted by: REPUBLIC OF KOREA

AGENDA ITEM 5- ***Proposed amendments to the Terms of Reference of CCDRVDF***

Comments to CL 2010/47 RVDF, part C (point4)

We thank the working group for updating the terms of reference. We think that provision(e) and (f) have to be removed because terms of reference should be specific, instead of being ambiguous and provision(c) "code of practice" can cover provision (f).

AGENDA ITEM 6- ***Proposed Draft MRL for veterinary drugs,***

Korea believes that MRL for amoxicillin, derquantel, monensin, monepantel and narasin should proceed to the next step. In the case of apramycin, we believe more sensitive analytic method is necessary to increase the test reliability for apramycin in edible tissue. Therefore, in this case, we recommend MRL should stay at this step.

AGENDA ITEM 9(a) - ***Draft priority list of veterinary drugs requiring evaluation or re-evaluation by JECFA***

Korea would like to include gentian violet into priority list of veterinary drugs because it is used in many member countries and is similar to malachite green. We also suggest that lasalocid should be included in the list, because MRL is different among member countries and we need more sensitive method for the detection of lasalocid in edible tissue. The Maximum permissible level of lasalocid under the Korean regulatory system is 20 mg/kg for muscle, liver, kidney and fat of cattle, poultry and 50mg/kg for egg, and 10mg/kg for milk.

AGENDA ITEM 10 - ***Risk management recommendations for the veterinary drugs for which no ADI and/or MRL has been recommended by JECFA due to specific human health concerns***

We understand that codex MRL is set for global food trade. This means that no residue is permitted so as to protect public health. Since, JECFA currently does not make ADI or MRL recommendations on genotoxic carcinogens, though some other countries are using those compounds for special purpose, Korea is basically supporting option A.

We think that CCRVDF should classify these compounds as “zero residue compounds”. Or option A should be rewritten so that it includes the following provision.

“Animal products originated from livestock treated with veterinary drugs, such as carbadox, which hasn’t secured JECFA‘s ADI and/or MRL recommendations because of public health concerns, should not be traded internationally”.

Our understanding is that since these compounds should not be detected in foods, some countries such as Korea, USA, Japan, EU already have not used them for food producing animals.

AGENDA ITEM 11 - ***Discussion paper on policies for the establishment of MRLs or other limits in honey***

Although a limited number of approved drugs are available for disease treatment in honey bees in many countries, including Korea, it is necessary for JECFA to develop policies on risk assessment to set MRLs in honey.

Because honey products are frequently traded internationally, we believe it’s necessary to hold a forum to discuss related issues and principles. Also, we would like to join the e-working group to share our expertise if it is allowed.

AGENDA ITEM 12 - ***Discussion paper on extrapolation of MRLs to additional species and tissues***

Korea has adopted extrapolation policy. We use the lowest MRL among the MRLs for the same tissue, if national or Codex MRL is not available.

We think that extrapolation could reduce the economic burden on industry and it could be very helpful for veterinary practitioners to select drugs for minor species.

We believe this policy can prevent the unnecessary animal deaths from the variety of diseases by making lots of veterinary drugs available.

Korea believes that target compounds for extrapolation should be clarified.

We need to extend the scope of extrapolation application to the cases where drugs have been approved, yet there are no MRLs regarding them. In this regard, CCRVDF should set criteria for determining which compounds are subject to extrapolation.

Therefore, extrapolation should be applied to the following cases as well;

1. Veterinary drugs used for minor species or for minor use;
2. Old drugs that their MRLs have not been considered;
3. Veterinary drugs for extra-label use or drugs for internationally traded livestock; and
4. Veterinary drugs for minor species whose products are consumed as major food in specific region

Korea is asking JECFA to clarify following issues.

First, we are wondering if there is any case where LOQ was used as an alternative to MRL due to the lack of data.

If there is, we don't think that the same MRL values among different species and tissues be used as scientific basis for extrapolation.

Second, some compounds such as closantel, cyholothrin, ivermectin, triclabendazole have different MRLs among the same type of matrix in physiologically related species; on the other hand, some have same MRLs between ruminant and monogastric animals.

Korea would like JECFA to review above issues.