CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 3, 4, 6, 7, 9 **CRD16**

February 2023

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

26th Session
13-17 February 2023
Portland, Oregon, United States of America

Comments submitted by Argentina

Agenda Item 3: Matters of interest arising from FAO/WHO including JECFA

Among the Matters of interest arising from FAO/WHO and JECFA is the "development of capacities in Latin America on risk assessment for food safety for residues of veterinary drugs in food".

Within this framework, a series of webinars was carried out during 2020-2022, covering an extensive technical program divided into several modules and culminating in a face-to-face workshop held in Chile from November 15 to 17, 2022 with the participation of Argentina, Brazil, Chile, Costa Rica, Mexico, Barbados and Guyana.

The objectives of the workshop were:

- Know all the stages of the risk assessment carried out by JECFA to establish MRLs.
- Know the importance of each of the different studies that are required and how they contribute to the establishment of MRLs for Codex standards.
- Understand the critical data that must be submitted in order for JECFA to carry out its evaluation.
- Identify, evaluate and establish priorities of substances that require Codex MRLs and that are of importance for the region in order to include them in the Priority List of the 27th meeting of the CCRVDF.

In this regard, Argentina appreciates the cooperation of FAO/WHO and JECFA for supporting capacities in the region. It also thanks the French government for financing these activities.

Argentina wishes to indicate that it integrates the CCLAC CRD on this topic.

Agenda Item 4: Matters of interest arising from the Joint FAO/IAEA Centre

Argentina appreciates the permanent cooperation that has been given by the IAEA (International Atomic Energy Agency), especially with regard to the mandate of this committee, strengthening research activities and also, for its permanent concern and support to strengthen national and regional techniques capacities. We express our broad support for these activities and interest in continuing to participate and cooperate when required.

Particularly in this last period, we want to express our gratitude for the participation in the training and strengthening of control systems carried out within the framework of the following technical cooperation projects.

- RLA 5080: Strengthening of regional collaboration between official laboratories to face new challenges related to food safety.
- RLA 5081: Improvement of regional analytical capacities and vigilance programs for residues and contaminants in food using nuclear / isotopic and complementary techniques.

The activities in which our country participated include:

Training on analysis of residues and contaminants in food and risk assessment programs in collaboration with the Latin American and Caribbean Analytical Network (RALACA)

Training on vigilance programs for veterinary drug residues, for the establishment, improvement and execution of national vigilance programs for veterinary drug residues in products of animal origin.

Establishment of networks, to promote the exchange of technical knowledge, experiences and resources between laboratories**.**

Residue analysis training: The Joint FAO/IAEA Center held virtual training courses on analytical methods to detect and control residues and organic contaminants in food.

Argentina wishes to indicate that it integrates the CCLAC CRD on this topic.

Agenda Item 6: MRLs for veterinary drugs in foods

Agenda Item 6.1: MRLs for Ivermectin (sheep, pigs and goats - fat, kidney, liver and muscle) at Step 7. Documents REP21/RVDF25, Appendix II and CX/RVDF 23/26/6

At the 25th meeting of the CCRVDF it was stated that the proposed MRLs for Ivermectin in swine, sheep and goats were considerably low; and while they did not represent a food safety concern, they could pose commercial difficulties in relation to Good Veterinary Practices (GPVs). In view of the important safety margin of the substance and in order to be able to establish shorter treatment periods, it was agreed to advance to Step 5 which would allow another round of comments and a new evaluation by JECFA with new data available.

Considering that new data were sent and that JECFA carried out a re-evaluation of the MRLs for pigs, sheep and goats, Argentina recommends the suspension of this MRL proposal that is in step 7.

Agenda Item 6.2: MRLs for Ivermectin (pigs, sheep and goats) and Nicarbazin (chicken) at Step 4. Documents CL 2022/71-RVDF and CX/RVDF 23/26/6

- MRLs for Ivermectin at Step 4: Considering that new studies were sent, that JECFA carried out a re-evaluation of the MRLs in sheep, goats and pigs, that the results of said evaluation were published in its Report 94, that higher and consistent MRLs were proposed as a result of this new evaluation with the BPVs those that allow shorter withdrawal periods, that the new MRLs do not represent a concern for food safety, that the substance had a complete re-evaluation by JECFA when MRLs were established in bovines, also updating the values of Acceptable Daily Intake (ADI), that the substance is in widespread use and safety levels are known; Argentina supports progress and continue in the accelerated step 5/8.
- MRLs for Nicarbazin at Step 4: Considering that new studies were sent, that JECFA carried out a re-evaluation of the MRLs in chickens with the contribution of new information available, that the results of said evaluation were published in its Report 94, that from the result of this new evaluation MRLs were proposed more those that allow for shorter withdrawal periods are high and consistent with the BPVs, that the new MRLs do not represent a food safety concern, that the substance is in widespread use and the safety levels are known; Argentina supports progress and continue in the accelerated step 5/8.

Agenda Item 7: Extrapolation of MRLs for veterinary drugs in foods

Agenda Item 7.1: Extrapolated MRLs for different combinations of compounds/ commodities at Step 4. Documents CX/RVDF 23/26/7 and CX/RVDF 23/26/7-Add.1

Considering that the approach for the extrapolation of maximum residue limits of veterinary drugs to one or more species was included as Annex C of the document Risk analysis principles applied by the CCRVDF; that the 44th Session of the Codex Commission (CAC) adopted the approach proposed by the 25th CCRVDF, that the proposed extrapolated MRLs in Appendix I comply with the standards contained in the approach for the extrapolation, Argentina supports the progress of the processing of the extrapolated MRLs that are found in Appendix I of the document and continue in step 5:

- Amoxicillin, Benzylpenicillin, Tetracyclines, Cyalothrin, Spectinomycin: extrapolation to all Ruminants (includes Milk).
- Cypermethrin, Deltamethrin, Moxidectin, Tilmicosin, Levamisole: extrapolation to all Ruminants (Milk not included).
- Deltamethrin, Flumequine: extrapolation to Finfish.

Agenda Item 7.2: Approach for the extrapolation of MRLs for residues of veterinary drugs for offal tissues. Documents CX/RVDF 23/26/7 and CX/RVDF 23/26/7-Add.2

Considering that the approach for the extrapolation of the maximum residue limits of veterinary drugs to one or more species does not allow the extrapolation of the MRL for Ivermectin in bovine milk to goat and sheep milk, nor does it allow the extrapolation to milk of the of Cypermethrin, Deltamethrin, Moxidectin and Tilmicosin, Argentina proposes:

- Request advice from JECFA on whether the appropriate M:T value for extrapolation of MRLs in milk should be 1 or could adopt another value as long as it is known.

- Study new ways of extrapolation of veterinary drug residue MRLs for offal tissues other than kidney and liver.

Agenda Item 9: Matters of interest arising from the Joint CCPR/CCRVDF Working Group

Argentina supports and appreciates the creation of the CCPR-CCRVDF electronic working group. This will make it possible to agree on MRLs for dual-use substances, harmonize methodologies for risk management, and establish unified Codex values for Acceptable Daily Intake (ADI), for which it is being considered:

- Request JECFA and JMPR to continue working to harmonize their risk assessment methodologies, including how to establish single harmonized ADI and MRL values for dual-use substances (agricultural and veterinary).

- Request to JECFA and JMPR the feasibility of carrying out a joint evaluation of dual-use compounds and the establishment of a joint JMPR/JECFA EWG.

- Request consent from study sponsors for data sharing to JECFA and JMPR at the time of data package submission.

- Develop a database of dual-use compounds that can be shared among committees to facilitate the development of single, harmonized MRLs. This database could be developed based on the needs and priorities of the regions.

- Identify dual-use compounds that have different MRLs and/or ADIs for the same edible product of animal origin and recommend single, harmonized MRLs. This could be done within the GTE (CCPR-CCRVDF) that currently exists, and the creation of a new GTE is not considered necessary.

Argentina will continue to support these joint work initiatives in order to harmonize and agree on methodologies.