

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

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Minneapolis, Minnesota, United States of America

Comments submitted by Panama

Panama thanks the Codex Secretariat and the countries that led the various electronic working groups for the preparation of the documents submitted for consideration by the Committee.

Panama recognizes the importance of the work of the Codex Committee on Veterinary Drug Residues in Food to strengthen the scientific basis for establishing maximum residue limits (MRLs), thereby contributing to the protection of consumer health and the facilitation of international trade.

Panama supports efforts aimed at improving the coherence, transparency and applicability of the standards and guidelines developed within the framework of the Codex, as well as those aimed at strengthening the use of risk analysis as a basis for decision-making.

Agenda item 2: Matters referred to the Committee by the Codex Alimentarius Commission and other subsidiary bodies

Panama appreciates the presentation of the matters referred by the Codex Alimentarius Commission and other auxiliary bodies, and recognizes their importance in guiding the Committee's work in a coherent and strategic manner.

In this regard, Panama reiterates its support for strengthening the risk-based approach as a fundamental pillar for decision-making within the Codex framework, emphasizing the need for the recommendations issued by the Commission and the Executive Committee to be translated into concrete actions that facilitate the efficient progress of the Committee's work.

Panama highlights the essential role of the Joint FAO/WHO Expert Committee on Food Additives as a scientific advisory body, and insists on the importance of ensuring that applications for evaluation and re-evaluation of veterinary medicines respond to priorities clearly defined by the members, considering both the protection of public health and the facilitation of international trade.

We support initiatives aimed at strengthening coordination among Codex committees, particularly on cross-sectoral issues requiring a harmonized approach. In this context, it is considered essential to continue promoting mechanisms that improve technical collaboration and synchronization of work among committees, avoiding duplication and optimizing the use of available resources.

Panama encourages members to maintain active participation in Codex processes, including the timely submission of comments, the provision of scientific data, and inter-institutional coordination at the national level, with a view to strengthening the quality and legitimacy of the decisions adopted.

Agenda item 3: Issues of interest raised by the FAO and WHO, including the JECFA

Panama appreciates the information presented in relation to the issues referred by the Joint FAO/WHO Expert Committee on Food Additives and recognizes the fundamental role of this body as a scientific basis for the establishment of maximum residue limits (MRLs) within the framework of the Codex.

Panama reiterates the importance of JECFA's evaluations being conducted in a timely, transparent manner and based on the best available scientific evidence, in order to effectively support the Committee's decision-making and respond to the needs of member countries.

We emphasize the need to strengthen the planning and prioritization of substances to be evaluated, ensuring that these address genuine concerns regarding public health, veterinary use, and international trade. We also stress the importance of receiving comprehensive and high-quality information from members and sponsors, enabling JECFA to conduct robust and conclusive evaluations.

Panama also recognizes the importance of improving coordination between JECFA and the Committee, as well as with other Codex scientific bodies, with the aim of optimizing available resources, avoiding duplication, and facilitating the harmonization of scientific criteria, especially on emerging and cross-sectoral issues.

Agenda item 4: Issues of interest raised by the Joint FAO/IAEA Centre

Panama appreciates the presentation of matters of interest by the Joint FAO/IAEA Centre for Nuclear Techniques in Food and Agriculture and recognizes the valuable contribution of this centre in strengthening the analytical and scientific capacities of member countries.

Panama highlights the strategic role of nuclear and related techniques in the detection and quantification of veterinary drug residues in food, particularly in the development and validation of sensitive, reliable, and internationally comparable analytical methods. These tools are essential to support the implementation of national residue monitoring and control programs, as well as to ensure compliance with the maximum residue limits (MRLs) established by the Codex Alimentarius Commission.

We emphasize the importance of continuing to strengthen technical cooperation, technology transfer, and training in developing countries in order to reduce gaps in analytical capabilities and promote more equitable participation in the international food safety system.

Panama also encourages continued efforts to harmonize analytical methodologies, as well as develop reference materials and quality assurance programs, to improve comparability of results between laboratories and facilitate international trade.

Agenda item 5: Issues of interest raised by OMSA, including VICH.

Panama appreciates the information presented by the World Organisation for Animal Health, as well as the updates related to International Cooperation on Harmonisation of Technical Requirements for the Registration of Veterinary Medicines, and recognizes the relevance of both entities in strengthening the international framework on animal health and veterinary medicines.

Panama highlights the importance of coherence and complementarity between the standards, guidelines and recommendations developed by OMSA, VICH and the Codex Alimentarius, particularly regarding the responsible use of veterinary medicines, the prevention of antimicrobial resistance and the protection of public health.

We emphasize that the technical guidelines developed within the framework of the VICH constitute a relevant input for improving the quality, safety and efficacy of veterinary medicines, as well as for facilitating the generation of robust scientific data that support the risk assessments carried out by the Codex, in particular by the Joint FAO/WHO Expert Committee on Food Additives.

Panama emphasizes the need to strengthen coordination between the animal health, public health and trade sectors, in line with the "One Health" approach, promoting responsible veterinary practices and effective food residue control systems.

Agenda item 6: Maximum residue limits (MRLs) of veterinary medicinal products assessed at the 98th JECFA meeting (2024): MRLs of fumagillin dicyclohexylamine (DCH) in fish (fillet) and honey (step 7)

Panama appreciates the JECFA investigations and agrees with the progress of the MRL assessments presented at the 98th meeting of the Joint FAO/WHO Expert Committee on Food Additives on the MRLs of the veterinary drug fumagillin dicyclohexylamine (DCH) in finfish (fillet) and honey; we also support the continuation of the risk assessment or additional studies with the data presented by those countries that have references and scientific studies for this project.

Panama welcomes the update of scientific information relating to the Codex database on veterinary drug residues in food and recognizes its value as a key tool for taking action by providing access to consolidated and transparent information on maximum residue limits (MRLs).

Agenda item 7.1: Extrapolated maximum residue limits for different combinations of compounds and fabrics (in step 4)

Panama takes note of the progress presented in relation to the extrapolation of maximum residue limits (MRLs) for different combinations of compounds and tissues, within the framework of Step 4, and recognizes that this approach constitutes a relevant tool to optimize the work of the Committee and the Joint FAO/WHO Expert Committee on Food Additives.

From a technical standpoint, Panama believes that extrapolating MRLs, when based on sound scientific principles and clearly defined criteria, expands the applicability of existing assessments, reducing the need to generate additional data in all cases. This is especially important for minor species or specific matrices where data availability may be limited.

However, Panama emphasizes that this approach must be applied with caution, ensuring that the same level of consumer health protection is maintained. In this regard, it is essential that extrapolation decisions be based on sufficient scientific evidence, including physiological and metabolic similarities and residue patterns among the species and tissues considered.

Panama appreciates the work carried out by the electronic working group (EWG) and supports the advancement of this work in Step 4, agrees with the results obtained on the extrapolation of maximum residue limits of veterinary drugs for camelids in different tissues: albendazole, ivermectin and oxytetracycline, and we value that the decisions on the extrapolation remain strictly based on scientific evidence that allows strengthening this approach, ensuring at the same time its scientific soundness and its practical applicability.

Agenda item 7.2: Other matters relating to the extrapolation of maximum residue limits of veterinary drugs in food to one or more species: Extrapolation to tissues of edible offal other than liver and kidney

Panama appreciates the work presented regarding the extrapolation of maximum residue limits (MRLs) to tissues of edible offal other than liver and kidney, and recognizes the relevance of advancing on this issue.

From our perspective, this issue has particular practical importance, since in many countries, including Panama, the consumption of offal is a regular part of the diet, so having clear references on MRLs contributes both to consumer protection and to the effective management of official control.

Panama believes that extrapolating to these tissues can be a useful tool, provided it is based on sound scientific principles. In particular, it is crucial to understand the behavior of residues in different tissues, as well as the potential variations in their accumulation and elimination, before extrapolating existing values.

At the same time, we believe it is necessary for the Committee to move forward with clear and harmonized criteria to guide these types of decisions, avoiding divergent interpretations between countries.

Panama appreciates the work done by the electronic working group (EWG), and is open to continuing to analyze this issue and supports the continued development of the work, seeking a balance between technical feasibility and the need to maintain a high level of public health protection.

Agenda item 8.1: Guidance on measures that could be taken by the competent authorities following the detection of veterinary medicinal product residues in food of animal origin caused by the unavoidable and unintentional transfer of veterinary medicinal products in animal feed (in step 4)

Panama appreciates the work done by the electronic working group (EWG) with the progress of the guidance document on the measures that could be taken by the competent authorities after the detection of veterinary drug residues in food of animal origin, derived from the inevitable and unintentional transfer in feed.

Panama recognizes that this issue poses a real challenge to official control systems, particularly in contexts where the production, storage, and transport of animal feed can lead to unintentional cross-contamination. In this regard, clear and harmonized guidance is essential for proper risk management.

From an operational point of view, Panama considers that the proposed measures should be proportionate to the level of risk identified and based on scientific evidence, avoiding the adoption of actions that may be unnecessarily restrictive to trade when dealing with involuntary and controlled situations.

It is also appreciated that the guidance includes a practical approach for competent authorities, including criteria for case assessment, the application of corrective measures, and risk communication. This will contribute to greater consistency in decision-making at the international level.

Panama also highlights the importance of strengthening good practices in the manufacture and handling of animal feed, as a key preventive measure to reduce the occurrence of these types of situations.

In general terms, Panama supports the advancement of the document in Step 4 and believes that its development will contribute significantly to improving the management of this type of risk, providing greater clarity to both the authorities and the operators of the sector.

Agenda item 8.2: Intervention thresholds for different combinations of compounds and tissues (in step 4)

Panama appreciates the work presented in relation to the establishment of intervention thresholds for different combinations of compounds and tissues, and recognizes that this approach constitutes a key tool for the practical management of situations in which veterinary drug residues are detected.

From a regulatory perspective, Panama considers that intervention thresholds can significantly contribute to more consistent decision-making, especially in scenarios where there are no established maximum residue limits (MRLs) or when dealing with findings derived from unintentional situations.

However, Panama emphasizes that the development and implementation of these thresholds must be clearly grounded in sound scientific principles and risk analysis, ensuring that their application does not compromise consumer health. In this regard, it is essential to clearly distinguish between intervention thresholds as risk management tools and MRLs as standards based on scientific assessments conducted by the Joint FAO/WHO Expert Committee on Food Additives.

Panama also considers it important that the criteria for defining and applying these thresholds be transparent and harmonized internationally, in order to avoid divergences that could generate uncertainty in trade.

It appreciates the work carried out by the electronic working group (EWG) and supports the progress of the work on Step 4 for nicarbazin and lasalocid residues in chicken eggs, and invites continued deepening in the development of clear guidelines that facilitate their implementation by the competent authorities, ensuring at the same time coherence, proportionality and effective protection of public health.

Agenda item 9: Coordination of work between the Codex Committee on Pesticide Residues and the Codex Committee on Veterinary Drug Residues in Food

Panama welcomes the progress presented regarding coordination between the Codex Committee on Pesticide Residues and the Codex Committee on Veterinary Drug Residues in Food, and recognizes that this work is of increasing strategic importance, especially in the context of dual-use compounds.

Panama believes that effective coordination between both committees is essential to avoid duplication, reduce inconsistencies, and move toward harmonized approaches in establishing maximum residue limits (MRLs). In this regard, the work of the joint working group and the efforts aimed at improving technical and procedural collaboration are highly valued.

However, Panama believes that the identified challenges, particularly regarding limited participation and difficulties in reaching consensus, must be addressed as a priority. In this context, we support holding joint virtual meetings as a practical mechanism to streamline the work, foster direct exchange between delegations, and facilitate more coherent decision-making between both committees.

We emphasize the importance of strengthening coordination between the scientific bodies that support both committees, especially the Joint FAO/WHO Expert Committee on Food Additives and the Joint FAO/WHO Meeting on Pesticide Residues, in order to ensure that the scientific basis for MRLs is consistent and comparable.

Panama reaffirms its support for the continuation of the joint working group and the strengthening of coordination mechanisms between the CCPR and the CCRVDF, and urges members to actively participate in this process, with a view to achieving concrete, efficient and consensus-based results.

Agenda item 10: List of priority veterinary medicines that require evaluation or re-evaluation by JECFA.

Panama appreciates the compilation of observations presented and recognizes the importance of having a clear, transparent, and scientifically based list of priorities to guide the work of the Joint FAO/WHO Expert Committee on Food Additives.

In line with previous interventions, Panama reiterates its commitment to strengthening the scientific basis that underpins the decisions of the Codex Alimentarius and highlights the importance of making timely progress in the evaluation and re-evaluation of veterinary medicines, based on the needs identified by member countries.

Panama believes that prioritization should follow a balanced approach that considers factors such as the actual use of medicines in production systems, the availability of scientific data, potential risks to public health, and implications for international trade. In this regard, it is essential to ensure that the compounds included on the list have sufficient information to allow the Joint Commission on Pharmaceutical Research (JECFA) to conduct robust and conclusive assessments.

We value the contributions of members in identifying new substances and providing technical data, and urge them to continue strengthening this participatory process. The timely availability of data is a key element in ensuring the efficiency of JECFA's assessment scheduling.

Panama also recognizes the importance of tools such as MRL extrapolation and parallel examination, provided they are applied in accordance with Codex risk analysis principles and with due scientific support.

We support the progress of work related to the priority list and encourage members to continue to actively contribute, with a view to ensuring science-based decisions, protecting consumer health and facilitating international trade.

Agenda item 11: Other matters and future work.

Panama welcomes the opportunity to consider other matters and reflect on the Committee's future work, recognizing the importance of strategic planning that will allow for efficient and coherent progress on the agenda of the Codex Committee on Veterinary Drug Residues in Food.

Panama believes that, in preparation for future work, it is essential to prioritize issues that have a direct impact on protecting public health and facilitating international trade, while ensuring the efficient use of available resources, both at the Committee level and within the scientific advisory bodies.

We emphasize the importance of continuing to strengthen tools such as MRL extrapolation, the establishment of intervention thresholds, and the improvement of intercommittee coordination mechanisms, as well as promoting the development of practical guidance to support competent authorities in the implementation of Codex standards.

Panama emphasizes that future work should consider the needs of developing countries, particularly regarding capacity building, access to scientific data, and effective participation in Codex processes.