

EUROPEAN COMMUNITY
COMMENTS ON
DOCUMENT CX/RVDF 03/08

**Agenda Item 9: Discussion Paper on Risk Management Methodologies,
including risk assessment policies in the Codex Committee on Residues of
Veterinary Drugs in Food**

The European Community would like to thank France for the preparation of this discussion paper. We regret that JECFA's conclusions on this subject are not available yet, as they would be needed to take this issue further. On the current document we have the following comments:

Recommendation No 1:

The European Community supports this recommendation.

Recommendation No 2:

The European Community supports this recommendation. However it needs to be established who drafts the 'simplified risk profile' as it seems quite unlikely that a respective document is completed during the Committee meeting. The format should, however, be agreed in the Committee meeting.

Recommendation No 3:

The European Community supports this recommendation. Unfortunately more detailed proposals can only be made when JECFA's conclusions on this issue are available.

Recommendation No 4:

The European Community is not against this recommendation, however we fear that the resources that have to be assigned to this exercise do not justify the potential outcome. It might be sufficient that the working group takes these guidelines into account when drafting new guidance proposed under recommendation 3.

Recommendation No 5:

The European Community supports this recommendation.

Recommendation No 6:

The European Community supports this recommendation. The format of this report should be mutually agreed between JECFA and CCRDVF. As suggested in Paragraph 39 of the “Proposed draft working principles for risk analysis for application in the framework of the Codex Alimentarius (ALINORM 03/33, appendix II), the *“major function [of risk communication and therefore a respective report] should be to ensure that all information and opinion essential for effective risk management is incorporated into the decision making process”*. The reporting format should therefore clearly distinguish between the toxicological risk assessment and the evaluation of the risk management options that have been considered. The influence of the risk management choices on the magnitude of the risk should be discussed in the report.

Recommendation No 7:

The European Community supports this recommendation.

Paragraph 47

This paragraph should be reformulated as follows to *“Particular attention should be given to performance criteria of analytical methods used for residue detection and to the establishment of sampling plans needed to evaluate consignments in order to facilitate control, monitoring and, if necessary, the recall of products”*.

Recommendation No 8

The European Community supports this recommendation. The CCRDVF should establish a list of substances that should, due to their particular toxicology, not be used in food producing animals. This would make the Codex guidance more transparent. In consequence FAO would not have to suggest in isolated statements (as on 24 January 2002 e.g. for chloramphenicol) that countries should take steps to stop the use of chloramphenicol in food production.
