25 June 2013

Codex Committee on Residues of Veterinary Drugs in Foods
21st Session

Minneapolis, Minnesota, 26-30 August 2013

European Union comments on

Risk Management Recommendations for Residues of Veterinary Drugs for which no ADI and/or MRL has been recommended by JECFA due to Specific Human Health Concerns

Agenda Item 6, CX/RVDF 13/21/6

European Union competence
European Union vote

The European Union (EU) would like to thank the participants of the electronic working group for the active participation in developing the document on the risk management recommendations for veterinary drugs where JECFA identified specific human health concerns.

The EU strongly supports the widely accepted scientific principle, as confirmed by FAO and WHO, that substances which are both genotoxic and carcinogenic should not be intentionally added to the food chain. They should not be used as veterinary drugs in food producing animals because risks for human health cannot be ruled out even at very low concentrations. The same policy should be applied to drugs where JECFA has identified other significant health risks.

The EU would prefer a strong risk management language for all substances[1] in Annex 1 of document CX/RVDF 13/21/6 clearly stating that these substances should not be used in food producing animals. Such clear recommendation would effectively mitigate risks posed by these substances to human health. However, in the spirit of compromise the EU can agree with the proposed option A with the language that was already agreed at the 20th CCRVDF for chloramphenicol and malachite green.

Option B would not be suitable for a Codex risk management recommendation for the following reasons:

- It is not scientifically sound because it states that competent authorities may choose to prevent residues by ensuring that use does not result in residues of toxicological concern. The fact is that residues in food at very low concentrations can never be ruled out if a substance is administered to food producing animals and in the case of genotoxic carcinogenes even these very low levels are of toxicological concern. This

[1] *Carbadox, furazolidone, nitrofural, chlorpromazine, stilbenes, olaquindox, dimetridazole, ipronidazole, metronidazole, ronidazole.*

is particularly true for substances which are metabolised to longstanding genotoxic metabolites.

- It is unclear and raises more questions than provides answers. For example, in case of some substances option B states that competent authorities may choose to "limit" the use of a substance in food producing animals while in other cases it states that competent authorities may choose to "prevent" the use of a substance in food producing animals.
- It fails to give harmonised risk management recommendations to national authorities. In this way, it goes against the basic Codex objective which is to introduce harmonised international standards protecting the health of consumers and ensuring fair practices in the food trade.