CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

26th Session, Portland, the United States, 13-17 February 2023

European Union comments on

Agenda Item 7

Extrapolation of MRLs for veterinary drugs in foods (CX/RVDF 23/26/7 and CL 2022/76-RVDF)

European Union Competence European Union Vote

The European Union (EU) would like to thank Codex members for the continuous support to the work on extrapolation.

The EU has the following comments on the questions raised in CL 2022/76-RVDF:

- a. The EU agrees that the proposed extrapolated MRLs in Appendix I CX/RVDF 23/26/7 comply with the agreed approach on extrapolation. The EU notes that existing Codex MRLs for tetracyclines, deltamethrin, spectinomycin and tilmicosin and the proposed extrapolated MRLs for these substances in ruminant tissues are in some cases higher than the corresponding EU MRLs and represent a safety concern as the ADI will be exceeded in an assessment using the TDMI approached used by the EU. Therefore, the EU would like to express its reservation for the following extrapolated MRLs:
 - MRLs for tetracyclines in ruminant muscle, liver and kidney
 - MRLs for deltamethrin in ruminant muscle, fat, liver, kidney and milk
 - MRLs for spectinomycin in ruminant muscle, fat and liver
 - MRLs for tilmicosin in ruminant muscle and fat
- b. The EU notes that the agreed approach on extrapolation does not allow extrapolation of bovine milk MRL for ivermectin to goat and sheep milk.
- c. The EU remains open to consider pragmatic approaches to extrapolate MRLs for residues of veterinary drugs for offal tissues other than liver and kidney while acknowledging that there may not be data available confirming the validity of such approaches.
- d. The EU supports consulting JECFA on whether the appropriate M:T value for residues of deltamethrin in bovine milk is 1.