European Community Comments for the

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Washington, D.C., 28 - 31 March 2000

CX/RVDF 00/7

Agenda item 8.2: Harmonization of MRL setting for compounds used both as pesticides and as veterinary drugs

The European Community welcomes and supports the Codex activities on harmonisation of MRL setting for compounds used both as pesticides and as veterinary drugs. In this respect the European Community supports all activities that ensure a better understanding of both expert panels involved (JECFA/JMPR) such as those proposed:

- The development and exchange of guidance documents describing evaluation processes
- Further discussion on different approaches to dietary intake
- Exchange of panel members

The European Community especially encourages Codex to organise of Ad hoc joint meetings of JECFA and JMPR.

The European Community favours the proposed case by case approach. However, it is felt that the changes in the definition of food commodities need to be discussed together by the Codex Committees specialised on certain food commodities (e.g. CC MMP) and the CC RDVF/CC PR.

The European Community also wants to make the following technical comments:

- it should be verified, each time that MRLs are established for compounds used both as pesticides as well as veterinary drugs, that the ADI is not exceeded;
- it should not be generally stated that if "where JECPA and JMPR have recommended MRLs for the same chemical with the same residue/marker residue definitions on the same commodity, the higher MRL shall prevail". This decision should be taken on a case by case basis with a respective reasoning (reference: page 5 of CX/RVDF 007);
- it should be taken into account that a compound might be metabolised in different ways in animals and plants. This might result in different marker residues for the same compound. However an effort should be made to agree the on the same marker residues

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