European Union reply to CL 2012/11-RVDF, Part B

Proposed Amendments to the Terms of Reference of the Codex Committee on Residues of Veterinary Drugs in Foods

The EU supports the amendment to point c of the terms of reference of CCRVDF, as proposed in Appendix II of REP12/RVDF. While it was confirmed at the last session of CCRVDF that the current terms of reference allow CCRVDF to consider risk management measures other than MRLs, it would be very useful to clearly spell this out in the terms of reference in order to avoid any confusion on this matter in the future.

If point c were amended as proposed, then the new point e would not be necessary as it refers to a specific case which would be covered by the amended point c.

Risk Analysis Policy on Extrapolation of MRLs of Veterinary Drugs to Additional Species and Tissues

The EU welcomes the development of risk analysis policy for extrapolation which would allow setting MRLs for additional species and tissues. It would provide CCRVDF with a valuable new tool to fulfil its mandate.

The EU supports the risk analysis policy as proposed in Appendix XI of REP12/RVDF. The EU notes that JECFA's advice on the draft policy and JECFA's response to the specific questions in paragraph 156 of REP12/RVDF are essential for further consideration of the draft policy.

Policy for residues in honey (inclusion in the Policy on extrapolation)

The EU considers that at this stage it is advisable to discuss the policy for residues in honey separately from the policy for extrapolation. A more informed decision on whether or not the two policies should be merged can be made after JECFA has delivered its advice on both items. Paragraph 8 of the draft policy on extrapolation (Appendix XI of REP12/RVDF), which concerns honey, should be put in square brackets for the time being.