EUROPEAN COMMUNITY COMMENTS ON CODEX DOCUMENT CX/RVDF 03/5

Agenda Item 6: Proposed Draft Appendix on the prevention and control of veterinary drug residues in milk and milk products

The European Community would like to thank the United States of America and the drafting group for the preparation of this *Proposed Draft Appendix on the prevention and control of veterinary drug residues in milk and milk products*. The European Community is generally in agreement with the document that applies the stable to table approach. We particularly welcome that the document confirms that "*veterinary drugs should be used only when necessary and as a complement to, but not a replacement for good management, vaccination and farm hygiene (paragraph 6)*". We propose to generally replace the word "*violative*" by the more generic term "*non-compliant (with the established standards)*" for clarity. Moreover we have the following comments on specific parts of the text:

Introduction: For completeness the introduction should also mention that residues of in particular antimicrobials might also have a negative impact on the production of for instance cheese.

Heading 3.1: The producers should be called dairy producers and not milk producers, as it is the dairy animals that produce the milk.

Heading 3.2: Likewise it is preferable to refer to the dairy industry all through the document instead of the milk industry.

Paragraph 3: In the last paragraph the word "*violative*" should be replaced by the more generic term "*non-compliant (with the established standards*)" for clarity

Paragraph 7: The second sentence should be replace by: "*The dairy veterinarian of the herd shares this responsibility if he or she carries out the diagnoses and prescribes the necessary medication. He or she determines the way the product is administrated to the animals and the respective conditions of use. In all cases in which veterinary drugs can be the source of residues in milk they should be subject to a respective prescription*."

Paragraph 11: The third sentence in this paragraph should be modified to require government authorities to "*select analytical methods for monitoring and enforcement purposes that meet acceptable performance criteria,...*".

Paragraph 13. The pharmaceutical industry should be able to contribute to the development of educational programmes for dairy producers only if governments can control the programmes. The information can be biased if the commercial interests are dominating. Thus the wording should be changed as follows: *Government authorities should also develop and promote educational programmes for dairy producers, with the co-operation of the concerned parties and the pharmaceutical industry.*

Paragraph 19: The end of the last sentence should read ".. *manufacturer/marketing authorisation holder*". In the proposal to amend the pharmaceutical legislation, the need to have the manufacturer

on the label was deleted. In any case this is now only required if the manufacturer is different from the marketing authorisation holder.

Paragraph 20: The end of the last sentence should read "…*appear on the label and be entered in the records*".

Paragraph 33: The significance of the difference between "*healthy animals*" and "*animals judged healthy by a veterinarian for milking purposes if they had been under treatment*" should be explained.