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Codex Committee on Residues of Veterinary Drugs in Foods
20th Session

San Juan, Puerto Rico, 7-11 May 2012

European Union comments on
Risk management recommendations for the veterinary drugs for which no ADI/MRL has been recommended by JECFA due to specific human health concerns

Agenda Item 10, CX/RVDF 12/20/13

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 welcomes the initiative of CCRVDF to develop risk management recommendations for the drugs where JECFA identified health risks.

The EU strongly supports the widely accepted principle 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. Therefore, the EU supports option A for risk management recommendations for all the substances in the Annex of the document.

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

- It fails to give clear and harmonised risk management recommendations to national authorities but instead invites them to take any measure they see fit. 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.
- It does not recognise JECFA's role as the primary source of scientific advice to CCRVDF by referring to national risk assessments on equal footing. Governments which have conducted risk assessments which allow the use of these substances under some circumstances, should bring those risk assessments to CCRVDF, together with any underlying scientific data which may not have been available to JECFA. It would then be for CCRVDF to decide whether JECFA should be asked to review the new information.