

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 2, 3, 4, 5, 6, 7, and 8

CRD10

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

25th Session
(Virtual)

12-16 and 20 July 2021

Comments submitted by Kenya

Kenya appreciates the opportunity to provide comments on the agenda items as follows:

Agenda 2: Matters referred by the CAC and/ or other subsidiary bodies: CX RVDF 21/25/2

Kenya takes note and welcomes the idea of collaboration between CCRVDF and CCPR when considering MRLs for compounds used as both veterinary drugs and pesticides.

Kenya supports that CCPR/EWG on the revision of the *Classification of Food and Feed* (CXM 4-1989), in addition to its existing terms of reference (ToRs), work closely with the CCRVDF/EWG on the definition of animal tissues (including edible offal) to develop a harmonized definition that would facilitate the establishment of MRLs for pesticides and veterinary drugs.

In addition, Kenya also welcomes the recommendation by CCEXEC75 for the CCRVDF/EWG on the definition of animal tissues, including edible offal, work closely with the CCPR/EWG on the revision of the *Classification of Food and Feed* to develop a harmonized definition that would facilitate the establishment of MRLs for pesticides and veterinary drugs.

Agenda 3.1: Matters of interest arising from FAO/WHO including JECFA: CX RVDF 21/25/3

Kenya appreciates the work of FAO and WHO in providing information on its activities that impact on CCRVDF. We note the 88th Report of JECFA and the recommendations of MRLs for the 3 veterinary drugs.

Agenda 3.2: Matters of interest arising from FAO/WHO on feed safety including the joint FAO/WHO Expert meeting on Carry-over of veterinary drugs in feed and transfer from feed to food of unavoidable and unintended residues of approved veterinary drugs: CX/RVDF 21/25/3- Add.1

Kenya takes note of the Joint FAO/WHO Expert Meeting report on carry-over of veterinary drugs in feed and transfer from feed to food of unavoidable and unintended residues of approved veterinary drugs and agrees with the recommendations of the report particularly those in the purview of Codex especially the revision of Codex code of practice on good animal feeding.

Kenya also proposes continuous monitoring data to be generated on unintended residues of approved veterinary drugs that could inform establishment of action levels for veterinary drugs in foods for cases where carry over is unavoidable.

Kenya notes that this scenario prompts a case where a veterinary drug ends up being a 'contaminant' in feed which results in a residue in food. This may precipitate a situation where Codex will need to establish a ML of the veterinary drug in feed. Further, it is recognised that the definition of a term 'contaminant' excludes veterinary drug.

Agenda 3.3: Matters of interest arising from the joint FAO/IAEA Centre CX/RVDF 21/25/3- Add.2

Kenya appreciates the initiatives offered by the joint FAO/IAEA and collaboration with Kenya among other African countries. Kenya has benefited from this collaborative initiative through the training that will be offered on '*The use of profiling/fingerprinting techniques to determine food origin and verify authenticity, IAEA nucleus platform, 16th to 27th August, 2021.*'

Agenda 4: Matters arising from OIE, including VICH: CX/RVDF 21/25/4

Kenya takes note and appreciates the capacity support that has been offered by OIE and VICH. Kenya recognises that VICH guidelines are referenced by drug regulatory authorities during assessment of veterinary drugs prior to issuance of marketing authorisation.

Agenda 5: Maximum Residue limit for Flumethrin (honey) at step 7 (Comments at step 6) CX/ RVDF 21/25/5

Kenya upholds the CCRDVF24 decision and recommends that CCRVDF25 agrees to forward a proposal to the Codex Alimentarius Commission (CAC) that an MRL for flumethrin in honey was 'unnecessary' for adoption at Step 8.

During the 24th CCRVDF (2018) meeting, JECFA Secretariat clarified that when flumethrin is used according to Good Veterinary Practices (GVP), the amount of residue that could be expected in honey is at or below the limit of quantification of currently available analytical methods and that there is very minimal risk of movement of residues from the wax to honey. This is because flumethrin is highly lipophilic. (REP18/RVDF, paras. 65-73)

Residues resulting from the use of this substance as an insecticide in accordance with GVP are unlikely to pose risk to human health.

Agenda 6.1: Maximum Residue limits for diflubenzuron (Salmon- muscle plus skin in natural proportion); halquinol (in swine- muscle, skin and fat, liver and kidney); ivermectin (Sheeps, pigs and goats- fat, Kidney, Liver and muscle) at step 4: CL2020/17- RVDF

Diflubenzuron (salmon - muscle plus skin in natural proportion)

Kenya recommends advancement of MRL for diflubenzuron (salmon - muscle plus skin in natural proportion) to **step 5/8** on account of 88th JECFA recommendation.

The drug has low acute oral toxicity and JECFA recommended MRL of 10 µg/kg in muscle plus skin.

Halquinol (in swine- muscle, skin and fat, liver and kidney);

Kenya recommends advancement of the MRL for halquinol to **step 5**

This compound is used significantly in swine and poultry in the Asian and South American countries. Products of poultry and swine are greatly traded between Africa and these countries. It is therefore prudent to have an MRL established to protect public health and enable countries within the African region to have a reference MRL when evaluating these products.

Advancement to step 5 to give an opportunity for more comments at step 6

Ivermectin (Sheeps, pigs and goats- fat, Kidney, Liver and muscle) at step 4: CL2020/17- RVDF

Kenya supports the advancement of the MRL for Ivermectin to step 5 allowing for another round of comment at step 6 and consideration by the Committee.

However, Kenya seeks clarification about the significant difference in MRLs recommended in sheep and goats as compared to cattle.

In addition, high end equipment will be required for analysis since Ivermectin doesn't have a good signal in LC-MS/MS analysis, and it will be hard to detect 10 µg/kg by HPLC-FLUO.

It will therefore be a challenge for developing countries which may not have such laboratory capabilities.

Agenda 7: Discussion Paper on extrapolation of maximum residue limits to one or more species (Including a pilot on extrapolation on MRLs identified in part D of the priority List- REP18/RVDF, App.VI)- CX/RVDF 21/25/8

Kenya commends the chair and co-chairs of the EWG for the good work undertaken in developing the discussion paper on extrapolation of MRL.

Kenya supports the proposed approach for extrapolation of MRLs and the proposed MRLs for ruminants and bony fish presented as the pilot on extrapolation of MRLs for drugs identified in the priority list Part D using the proposed approach.

The approach on extrapolation proposed in this document relies on there being confidence that metabolism in the concerned species will be similar to that in the reference species, i.e. that major metabolic pathways are comparable and major metabolites are produced in comparable proportions. The uncertainty that may exist with regard to the similarity of metabolism between the reference and concerned species even when they are related species, has been addressed in Section II of Appendix I of the discussion paper (Specific criteria for extrapolation).

Agenda 8: Discussion paper on the development of a harmonised definition for edible tissues of animal origin (including edible offal) (Coordination between the Codex Committee on Pesticide Residues and the Codex Committee on Residues of Veterinary Drugs in Foods); CX/RVDF 21/25/9

Kenya commends the chair and co-chairs of the EWG for the good work undertaken in developing the discussion paper for a harmonized definition for edible tissues of animal origin (including edible offal).

Kenya supports adoption of the proposed definition for edible offal as “Those parts of an animal, apart from the skeletal muscle and fat, that are considered fit for human consumption”.

Kenya also support the recommendations of the EWG as outlined in the discussion paper.