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, 8, 9 and 10 **CRD09**

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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 Nigeria

Agenda Item 2 Matters referred by the Codex Alimentarius Commission and other subsidiary bodies
CX/RVDF 21/25/1

Nigeria took note of the matters referred by the CAC to the 25th CCRVDF with regards to the following:

i. Amendments to the Procedural Manual
ii. Maximum residue limits and risk management recommendations adopted at Steps 8, 5/8 and 5
iii. Approval of new work for the elaboration of new standards and related tests
iv. Standards held at Step 8 - Draft MRLs for Bovine Somatotropins
v. Other matters

Agenda Item 3.1 Matters of Interest arising from FAO/WHO including JECFA - CX/RVDF 21/25/3

Nigeria took note of the matters of interest arising from the Report of Joint FAO and WHO Expert Committee on Food Additives (JECFA) in the provision of scientific advice to Codex and member countries and commends JECFA for the information and expert analysis provided.

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

Nigeria takes note of the report of the Joint FAO/WHO Expert Meeting on Carry-over in feed and transfer from feed to food of unavoidable and unintended residues of approved veterinary drugs. The report highlights the causes of veterinary drug carryover in animal feed; evaluates the known risks of veterinary drug transfer to food, it's impacts on human health and international trade; and provides guidance for further action required at the international level to address these issues.

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

Nigeria commends the joint FAO/IAEA division on its initiatives on the selected projects that have impacted positively on our laboratory and human capacity development with regards to food quality and safety. The joint division also developed several projects through Technical Cooperation Projects (TCP) and Coordinated Research Projects (CRP) in the fields of food contaminants detection and antimicrobial resistance control. Furthermore, the agency initiated the "African Food Safety network" (AFoSaN) that aims at collaboration and information sharing on food matters and on analytical techniques with participants from African countries. Nigeria commends the good contribution of IAEA in the upgrade on NAFDAC laboratory which has led to better assessment of chemicals and toxins in Foods by the Agency.

Agenda Item 4 Matters of interest arising from OIE including VICH - CX/RVDF 21/25/4

Nigeria took note of the report on OIE activities including VICH and commends OIE for their contribution in developing human capacity in Africa. Nigeria also considers joining the VICH Outreach Forum (VOF) as this will enable Nigeria to benefit from trainings and use of the VICH guidelines during assessment of veterinary drugs prior to issuance of marketing authorization.

Agenda Item 5 Maximum residue limit for flumethrin (honey) at Step 7 – Comments at Step 6 (in reply to CL 2020/17-RVDF) - REP18/RVDF App. IV

Nigeria supports upholding the decision reached at CCRVDF 24 and recommends that CCRVDF 25 should forward a proposal to the Codex Alimentarius Commission (CAC) that an MRL was 'unnecessary' for adoption at Step 8.

Rationale

At the 24th session of CCRVDF, JECFA Secretariat clarified that when flumethrin is used according to Good Veterinary Practices (GVP), the expected flumethrin residues in honey are at or below the limit of quantification of currently available analytical methods. In addition, there was very little 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 a hazard to human health.

Agenda Item 6.1 Maximum residue limits for diflubenzuron (salmon – muscle plus skin in natural proportion); halquinol (in swine – muscle, skin plus fat, liver and kidney); ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle) at Step 4 – Comments at Step 3 (in reply to CL 2020/17-RVDF) – CL 2020/17-RVDF

Diflubenzuron - Nigeria supports the advancement of MRL for diflubenzuron (salmon - muscle plus skin in natural proportion) to step 5/8 on account of 88th JECFA recommendation.

Rationale

This is because the drug has low acute oral toxicity and JECFA recommended MRL of 10 ug/kg in muscle plus skin.

Halquinol – Nigeria supports the advancement of the MRL for halquinol to step 5 and notes that this compound is a feed additive which has dual use as a growth promoter and for the treatment of scours /wet diarrhea in poultry and swine.

Rationale

This is because the risk management recommendations as guided by the application of the codex code of practice to minimize and contain foodborne antimicrobial resistance (CXC61-2005) would be considered by countries when evaluating use of such compounds.

Ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle) - Nigeria supports the advancement of the MRL for ivermectin to step 5 allowing for another round of comments and consideration by the Committee. However, there are concerns about the significant difference in MRLs recommended in sheep and goats as compared to cattle.

Rationale

This is because ivermectin is widely used in Nigeria against external and internal parasites of livestock and humans.

Agenda Item 6.2 Maximum residue limits for zilpaterol hydrochloride (cattle fat, kidney, liver, muscle) (JECFA81 and JECFA85) retained at Step 4 - CX/RVDF 21/25/7

Nigeria commends the Codex Secretariat and the CCRVDF Chair for preparing the information paper detailing the chronology of events regarding Zilpaterol Hydrochloride and supports the advancement of this drug to Step 5, because of the favorable risk assessment and recommendations by JECFA for cattle fat, kidney liver and muscle that indicated no adverse effects in humans at the recommended MRLs.

Agenda Item 7 Discussion paper on extrapolation of maximum residue limits to one or more species (including a pilot on extrapolation o MRLs identified in Part D of the Priority List - CX/RVDF/21/25/8

Nigeria commends the work of the EWG in developing the discussion paper on extrapolation of MRL and supports the proposed approach for extrapolation of MRL as well as 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.

Agenda Item 8 Discussion paper on the development of a harmonized definition for edible tissues of animal origin (including edible offal) - CX/RVDF 21/25/9

Nigeria commends the effort of the EWG for the work undertaken in developing the discussion paper for a harmonized definition for edible tissues of animal origin (including edible offal) and supports the 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".*

Nigeria also supports the recommendations of the EWG as outlined in the discussion paper.

Agenda Item 9 Discussion paper on advantages and disadvantages of a parallel approach to compound evaluation - CX/RVDF 21/25/10

Nigeria commends the chair and co-chairs of the EWG for the good work undertaken in developing the discussion paper on advantages and disadvantages of a parallel approach to compound evaluation.

Nigeria consider the following comments related to discussion paper:

a) ***General Comments:*** Africa Union supports the parallel review of a new veterinary drug as a complement to the current process to assess new compounds by JECFA for the establishment of Codex MRLs by CCRVDF. The overall format and content of the proposed procedure is agreeable.

b) Specific comments:

i. Principles: Nigeria has no additional proposals to the principles and the text.

ii. Procedure: Nigeria takes note of the phases outlined in the procedures and would wish to provide the following comments:

Phase1: Identification of a candidate: Nigeria proposes amendment to the text by deleting the word *'..some or all of…'* in the last sentence of paragraph 1 to read…... ***A proposed veterinary drug shall meet the following criteria:***

Phase 2: Submission: Nigeria proposes amendment to the text to read as follows …. ***A product is expected to be submitted to a national regulatory authority.*** , most likely in one of the larger markets (in practice, most veterinary products are first submitted for review in the U.S. or in Europe). ***At the subsequen****t following* ***CCRVDF meeting, the product would be submitted by the Codex Member who received the product application or is expected to receive the application by a certain date for inclusion on the priority list at CCRVDF (Step 1).***

Agenda Item 10 Database on Countries' need for MRLs - CX/RVDF 21/25/11

Nigeria supports the recommendations as stated in the document (CX/RVDF20/25/11) because they provide the much needed flexibility for member countries to submit their needs for MRLs.