CODEX ALIMENTARIUS COMMISSION
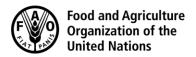
Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 5

CX/RVDF 21/25/5
April 2021

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 AT STEP 6 IN REPLY TO CL 2020/17-RVDF ON
MAXIMUM RESIDUE LIMITS FOR VETERINARY DRUGS IN FOODS
FOR CONSIDERATION AT STEP 7 BY CCRVDF25

MRL for Flumethrin (honey)

Comments received from Argentina, Brazil, Chile, Costa Rica, Cuba, Ecuador, El Salvador, European Union, Panama, Peru, Uganda, United Kingdom

Argentina

Argentina has no comments or objection to the proposal that an MRL is "unnecessary" for flumethrin in honey and to advance it for further consideration by CCRVDF25 at Step 7. However, we observe that, while Annex 1 of CL20_17s correctly indicates "MRLs Unnecessary," support document RVDF/25.INF/1 - Part 2 is outdated, as it indicates "MRL 6 ng/g," at Step 5.

Brazil

Brazil supports the advance of the draft MRL for flumethrin (honey), as presented in Annex 1, for consideration by CCRVDF25 at Step 7.

Chile

Chile supports advancing the proposed draft MRL for flumethrin in honey.

Costa Rica

Costa Rica would like to express its support for the MRLs for the drugs proposed at the different steps (flumethrin, Diflubenzuron in salmon, Halquinol in swine, and Ivermectin in sheep, pigs, and goats).

Cuba

Cuba agrees with the Codex recommendation where it proposes that an MRL is unnecessary for flumethrin in honey.

Ecuador

In Ecuador, we currently have 5 registered products containing this active ingredient, 2 of which are registered only for use in domestic animals (canines and felines), and the other 3 are registered only for use in ruminants (cows, sheep, and goats).

Given the use of flumethrin as a pesticide and the evidence presented by JECFA regarding its use and the residue that results from the use of this substance as such, when applying best practices in the use of veterinary drugs, the chances of it presenting a danger to human health are low, therefore we don't consider it necessary to establish an MRL and we agree with the proposal presented in Circular 2020/17-RVDF.

El Salvador

- We support the proposal by JECFA to establish that an MRL is "unnecessary" for flumethrin in honey, considering that MRLs shall be established for the purpose of guaranteeing food safety and consumer health and if this insecticide is used in accordance with good practice in the use of veterinary drugs, it is unlikely to pose a hazard to consumer health.

- We also wish to reiterate what was stated in CRD31, submitted at CCRVDF24, that it is concerning for developing countries to be at a disadvantage to verify compliance of the MRLs that are adopted, when verification of compliance is only possible by using a specific analytical methodology that depends on the equipment used (LC MS/MS).

- By establishing an MRL for Flumethrin in honey, the availability of veterinary drugs used in beekeeping may decrease.

European Union

The European Union (EU) supports the draft MRL for flumethrin in honey because it does not raise any consumer safety concern. This draft MRL is more conservative than the EU MRL.

Panama

Panama appreciates the investigations of JECFA and agrees with the advancement of the Draft MRL for Flumethrin in Honey recommended as not necessary by JECFA85.

Peru

In regard to flumethrin, we have no comments on the draft MRL for flumethrin in honey described in Annex 1, therefore we deem the proposal easible. It is worth noting that the European Union does not require MRLs for flumethrin in honey (EU Regulation 37/2010).

Uganda

Uganda is in agreement with the proposed MRL for flumethrin in honey.

United Kingdom

The proposed MRL for honey is the same as already approved in the UK. The recommendation is supported.