

April 29, 2011

Risto Holma
Administrator for Codex Alimentarius
European Commission
Health and Consumers Directorate General
Directorate D - Animal Health and Welfare

**RE: Codex Electronic Working Group Draft Report on Risk Management
Recommendations for Veterinary Drugs without ADI/MRL**

Dear Mr. Risto Holma:

The International Association of Consumer Food Organizations¹ (IACFO) supports the Codex Electronic Working Group's (eWG) risk management recommendations prepared for the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF) on the issue of veterinary drugs for which no Acceptable Daily Intake (ADI) and/or Maximum Residue Limit (MRL) have been recommended by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) due to specific human health concerns. These recommendations are based on reviews of JECFA evaluations and reports, decisions of the 10th Session of CCRVDF, actions taken and lessons learned by member states, and the best available toxicological data. The eWG's suggested risk management measures are both protective of public health and promote the international coordination of food safety standards. IACFO appreciates the opportunity to offer comments on the eWG draft report.

Practice of Veterinary Medicine Impacts Codex Goals and Public Health

IACFO applauds the work of the eWG led by the European Union (EU). The practice of veterinary medicine impacts the goals of Codex Alimentarius to protect the health of consumers, ensure fair practices in food trade, and assist in the harmonization of national food legislation and regulation of countries which want to use Codex texts as benchmarks.² Therefore, it is within the scope of CCRVDF to recommend veterinary drug risk management measures to member states.

¹ IACFO is an association of non-governmental organizations that represent consumer interests in the areas of nutrition, food safety, and related food policy matters. IACFO was formed in 1997 to increase consumer representation in the debate over the global food trade and to work with international agencies responsible for harmonizing standards related to the production, distribution, and sale of foods.

² Codex Alimentarius: FAQs. Accessed on April 25, 2011 at: http://www.codexalimentarius.net/web/faq_gen.jsp#G2

The specific human health concerns evaluated were genotoxicity and carcinogenicity. The eWG used the principle (confirmed in a joint FAO/WHO publication) that substances that are both genotoxic *and* carcinogenic, in general, should not be considered acceptable for use as veterinary drugs. The eWG determined that for all drugs reviewed,³ CCRVDF should recommend that these drugs **not** be used in food-producing animals (based on different reasons pertaining to the properties of the drugs outlined in the report). IACFO supports the recommendations stated in the draft as necessary to protect consumers because the JECFA evaluations indicated significant public health risks. IACFO believes that in the absence of perfect data, the demonstration of significant risk (not total risk) is sufficient to recommend uniform public safety actions.

Continuing the Public Health Focused Steps of Member States

Many countries have already banned a number of the substances under review and have found safer alternatives. Three examples are carbadox, nitroimidazoles, and olaquinox.

- Carbadox is a feed additive used for growth promotion and the prevention of dysentery in pigs. Because it has been found to be a genotoxic carcinogen, it is banned for use in livestock feed and human consumption in Canada, the EU forbids its use at any level, and Australia forbids its use in food-producing animals.
- Nitroimidazoles have been found to prevent histomoniasis in turkeys. Many countries (including the U.S. and EU) have banned the drugs for use in animals because of the uncertainty related to the drug's mutagenic properties, and have found alternatives to the control of histomoniasis, including improved biosecurity.
- Olaquinox is an antibiotic used as a feed additive in pigs for growth promotion. Toxicological data has not been provided to JECFA, so genotoxicity and carcinogenicity cannot be ruled out. Because of this, many countries (including the EU) have banned the use of olaquinox without experiencing adverse effects on their pig production.

Some drugs reviewed by eWG are also on the U.S. Food and Drug Administration's (FDA) list of drugs prohibited for extra-label use in all food-producing animals because they present a risk to public health. These drugs include: chloramphenicol, dimetridazole, ipronidazole, other nitroimidazoles, and nitrofurans. JECFA's evaluations and eWG's recommendations confirmed the findings and rulings by the FDA. The eWG has recommended taking the next step in protecting consumers by recommending that CCRVDF advise member states not use these drugs in food-producing animals.

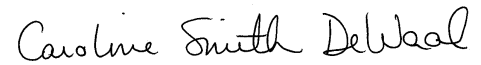
Additionally, IACFO would like to remind the committee that the Trans Atlantic Consumer Dialogue has recommended that all antibiotics used in food-producing animals be subject to veterinary prescription.⁴ Also, IACFO would like to suggest that the committee consider (in order to promote transparency and harmonization in trade) developing a form that would allow countries to better understand the veterinary drug practices that are allowed or banned in each country.

³ Carbadox, chloramphenicol, chlorpromazine, malachite green, nitrofurans, nitroimidazoles, olaquinox, and stilbenes.

⁴ TACD Food - Policy Statements. Accessed on April 29, 2011 at:
http://tacd.org/index.php?option=com_docman&task=cat_view&gid=44&Itemid=40

IACFO would like to thank the eWG committee members for their work on this essential public health issue. Their recommendations, if accepted by CCRVDF, could help to improve the safety of our food and decrease the presence of dangerous substances in the global food supply.

Sincerely,

A handwritten signature in black ink that reads "Caroline Smith DeWaal". The signature is written in a cursive, flowing style.

Caroline Smith DeWaal
President
IACFO
(International Association of
Consumer Food Organizations)