Codex Committee on Residues of Veterinary Drugs in Foods  
20th Session  
San Juan, Puerto Rico, 7-11 May 2012

European Union comments on the  
Discussion Paper on Extrapolation of MRLs to Additional Species and Tissues  
Agenda Item 12, CX/RVDF 12/20/15

European Union competence  
European Union vote

The European Union (EU) would like to commend Canada for the excellent work on extrapolation.

The EU welcomes the development of principles and risk analysis policy for extrapolation which would allow setting MRLs for additional species and tissues. It would provide CCRVDF with a valuable new tool to fulfil its mandate.

The discussion paper prepared by the electronic working group under the leadership of Canada provides a comprehensive and excellent analysis of the current approaches applied for MRL extrapolation and the potential areas for extrapolation including discussions on potential risks and concerns.

As regards the list of substances proposed for extrapolation, the EU supports the criteria for prioritisation proposed in paragraph 9. A starting point should be that Codex MRLs have been established in one or more species for a substance subject to extrapolation. The issue of accepting national or regional MRLs in the absence of Codex MRLs, mentioned in paragraphs 10 and 27 of the discussion paper, is a fundamental issue which merits its own discussion separately from extrapolation.

The EU supports asking JECFA's views on different topics as proposed under Task III of the discussion paper. On the specific issue of extrapolation of MRLs to honey, the EU suggests discussing the method of establishing MRLs by using a risk based approach by extrapolation of residue data (method of WRL) further in the context of the electronic working group of extrapolation.

The EU supports the risk analysis policy as proposed under Task IV of the discussion paper. It would be appropriate to request JECFA's opinion on it.