47th Joint Coordination Meeting of Arab and CCNE Codex Contact Points

PREPARATION FOR THE 28th SESSION OF THE CODEX ALIMENTARIUS COMMITTEE ON RESIDUS OF VETERINARY DRUGS (CCRVDF)

Presented by [Syria - Morocco]

[March] [17], 2026

Agenda item 8.1

Guidelines on risk-based actions to be taken by competent authorities following the detection of a residue of a veterinary drug in food caused by unavoidable and unintentional carryover of veterinary drugs in animal feed where there is no applicable codex maximum residue limit
(Step 4)

INTRODUCTION

(CCRVDF) has been addressing situations where residues of veterinary drugs are detected in foods of animal origin due to **unavoidable** and **unintentional carryover** in animal feed, particularly when no Codex Maximum Residue Limit (MRL) exists for the concerned commodity.

Carryover occurs when residues of veterinary drugs present in medicated feed are **inadvertently transferred** to feed intended for non-target animals during **the food chain**.

Even when feed manufacturers apply Good Manufacturing Practices (GMP), Hazard Analysis and Critical Control Point (HACCP) systems, and the Codex Code of Practice on Good Animal Feeding, small amounts of residues may still occur.

Detection challenge: In the absence of Codex MRLs for some commodities, zero-tolerance approaches have sometimes been applied, even when the residue does not present a food safety concern. This can disrupt trade and contribute to unnecessary food waste. A risk-based approach is needed to manage residues caused by unavoidable carryover while protecting consumer health and facilitating international trade.

BACKGROUND

Entity / Session	Main Outputs
2022 – CCRVDF25	Work initiated on managing residues caused by unavoidable carryover of veterinary drugs from feed to food. An EWG (Australia/Canada) was established to develop criteria for Codex Action Levels, using nicarbazin as a pilot case.
2023 – CCRVDF26	The EWG presented a discussion paper on criteria and procedures for establishing Action Levels. The Committee agreed to continue the work and refine the methodology, and re-established the EWG.
2024 – CCRVDF27	Agreement on a complementary Codex framework including Action Levels and guidelines for competent authorities. The criteria were forwarded to CAC47, new work on guidelines was proposed, and nicarbazin and lasalocid in eggs were prioritized.
2024 – CAC47	The Commission adopted the criteria and procedures for establishing Action Levels (Annex D of the Procedural Manual) and approved the new work on guidelines and approved the inclusion of nicarbazin and lasalocid in chicken eggs to the priority list for consideration for Action Levels
2025–2026 – EWG	Development of draft guidelines on risk-based actions and proposals for Action Levels for priority substances.
2026 – CCRVDF28	Draft guidelines presented at Step 4 for discussion. The framework relies on HBGVs (e.g., ADI), Codex Action Levels, and a Risk Management Decision Tool (RMDT).

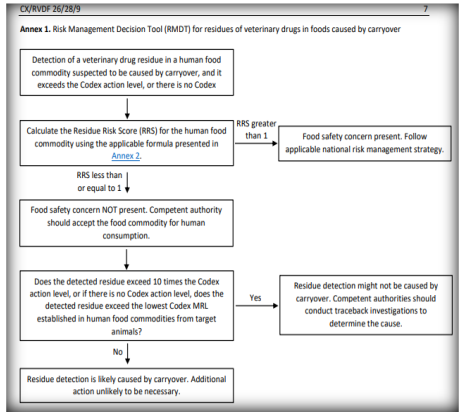
Work process

The draft guidelines were developed through the work of EWG involving 32 member countries and two observer organizations.

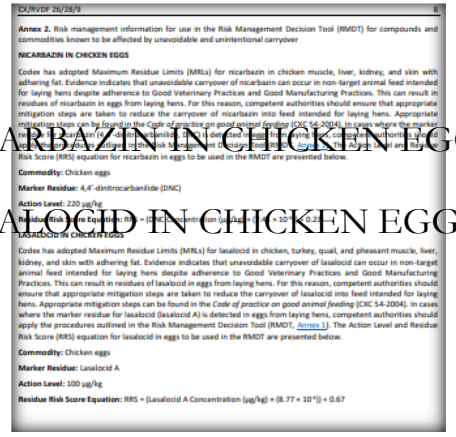
The methodology applied follows the Codex risk analysis framework and relies on scientific inputs from the Joint FAO/WHO Expert Committee on Food Additives (JECFA).

The proposed framework is based on the principle that risk management decisions should be proportional to the actual risk posed by detected residues. The methodology is explained in the appendix 1 in addition to 3 annexes for more explanation

Annex 1: application of the Risk Management Decision Tool (RMDT)



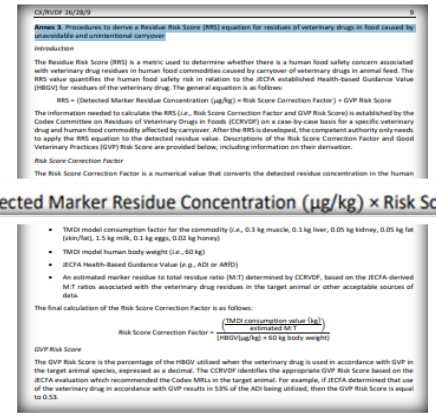
Annex 2. Risk management information for use in (RMDT)



NICARBAZIN IN CHICKEN EGGS

LASALOCID IN CHICKEN EGGS

Annex 3. Procedures to derive a Residue Risk Score (RRS)



RRS = (Detected Marker Residue Concentration (µg/kg) × Risk Score Correction Factor) + GVP Risk Score

RISK-BASED APPROACH TO MANAGING DETECTION OF RESIDUES OF A VETERINARY DRUG IN A HUMAN FOOD COMMODITY CAUSED BY UNAVOIDABLE AND UNINTENTIONAL CARRYOVER

PRINCIPLES

- A **risk-based approach** should be applied to manage residues suspected to result from **feed carryover**.
- **Codex Action Levels** represent residue concentrations in food that may occur due to **unavoidable carryover**. These levels are established through **scientific risk assessment by CCRVDF**.
- **Residues at or below the Action Level** are **acceptable and not a food safety concern**.
- When an **Action Level or risk management information exists**, detected residues in **non-target animals may reasonably be attributed to carryover (annexe 2)**.
- The **Action Levels and guidance apply to food of animal origin**, **not to animal feed or feed ingredients**.

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KEY POINTS ON CODEX ACTION LEVELS

- **Codex Action Levels** are available in **CXM 2** and in the **Codex Veterinary Drug Residue Online Database**.
- Information on how Action Levels are derived is provided in **Annex D of the CCRVDF Risk Analysis Principles**.
- **If the detected residue ≤ Action Level:** No food safety concern → **no further action required**.
- **If the residue exceeds the Action Level:** Competent authorities should apply the **Risk Management Decision Tool (RMDT)** to assess the risk.
- **If residues are detected below the limit of quantification (LOQ):** The **LOQ can be used as a surrogate value** for the residue concentration in the assessment.

APPLICATION OF THE RISK MANAGEMENT DECISION TOOL (RMDT)

The RMDT helps competent authorities assess food safety risks when residues are suspected to result from feed carryover.

It is presented as a **decision tree** (Annex 1).

When residues exceed a Codex Action Level or when no Action Level exists, authorities calculate the Residue Risk Score (RRS) using the detected residue concentration.

RRS ≤ 1: no food safety concern → product can be accepted.
RRS > 1: potential food safety concern → national risk management measures should be applied.

The tool also helps determine if carryover is the likely cause:

If residues exceed 10× the Action Level, carryover is unlikely.
If no Action Level exists, exceeding the lowest Codex MRL may indicate another cause. In such cases, traceback investigations may be initiated.

Annex 2 provides RRS equations and risk management information for specific drug–commodity combinations susceptible to carryover.

If a case is not covered in Annex 2, authorities may use Annex 3 principles to derive an appropriate RRS equation, based on JECFA Health-Based Guidance Values (HBGVs).

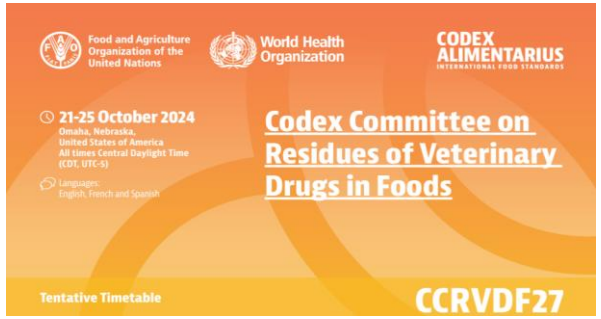
MONITORTING AND REVIEW OF DECISIONS TAKEN

- If traceback investigations show repeated exceedances of Codex Action Levels due to carryover, competent authorities should report findings to CCRVDF.
- This may lead to a revision of the Action Levels to reflect broader global conditions.
- If carryover affects other drugs or commodities not covered by the guidelines, authorities may submit data to support new Action Levels and risk management tools (e.g., RRS).
- CCRVDF may update the relevant parameters, particularly following JECFA re-evaluations.

SUMMARY OF KEY DISCUSSION POINTS

- ✓ Two members submitted comments that improved the clarity of the guidelines.
- ✓ One member proposed revising the **10× threshold used in the Risk Management Decision Tool** (section 6.2) for determining the cause of detected residues.
- ✓ The proposal suggested **replacing "10 times" with "some multiple"** to allow greater flexibility and encourage competent authorities to rely more on traceback investigations.
- ✓ **The EWG did not reach consensus on whether this change should be adopted**.

General Comment and recommandation for CCNE



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The Near East region may consider the following positions during discussions at CCRVDF28.

1. Support the development of the guidelines

The region may support the adoption of the draft guidelines as they contribute to improuved regulatory harmonization, enhanced consumer protection and facilited fair international trade.

2. Request practical implementation guidance

Given the technical complexity of the methodology, the region may encourage the development of implementation guidance for competent authorities.

3. Encourage expansion of the framework

Members may encourage CCRVDF to progressively establish Action Levels and RRS equations for additional veterinary drugs and commodities, particularly those relevant to regional production systems.

4. Request more clarification of methodological aspects

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