



**Minutes of the 29th Meeting of the Veterinary Residues Committee,
11.30 a.m., Wednesday, 24 June 2009,
The Park Inn, Thurrock**

Members present:

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|---------------------|------------|-------|
| Mrs Dorothy Craig | (Chairman) | DC |
| Mr Jon Averbs | | JA |
| Mr Tim Brigstocke | | TB |
| Mrs Sarah Buckley | | SB |
| Dr Gill Clare | | GC |
| Mr Andrew Grant | | AG |
| Mrs Susan Knox | | SK |
| Mr Stephen Lister | | SL |
| Dr W John McCaughey | | WJMcC |
| Mr Declan O'Rourke | | DoR |
| Mr David Ralph | | DR |
| Prof Mike Roberts | | TMR |

Others:

| | | |
|--------------------|-----|---|
| Mr Eric Crutcher | EC | Veterinary Medicines Directorate |
| Mr David Webb | DW | " " " (Secretariat) |
| Mrs Sandra Russell | SR | " " " |
| Mrs Dawn Greener | DG | " " " |
| Mrs Reena Agrawal | RA | |
| Mr John Points | JP | LGC Limited |
| Dr Glenn Kennedy | DGK | Agri-Food Biosciences Institute |
| Mr Matthew Sharman | MS | Food and Environment Research Agency (Fera) |
| Mr Andrew Spencer | AS | Food Standards Agency |
| Mr Rob Pettitt | RP | Animal Health |

Action Points

4.1.5 To investigate time limits for declaring treatments with veterinary medicines with respect to Food Chain Information (FCI).

Action: FSA

4.1.6 To suggest to John Fitzgerald that he may wish to include the issue of animals being submitted for slaughter before the end of Withdrawal Periods within some upcoming veterinary events he was addressing.

Action: Secretariat

4.1.7 To supply the Committee with the England Implementation Group's papers on declarations of FCI.

Action: TB

4.1.7 To prepare a paper setting out the legal responsibilities to supply FCI of those submitting animals for slaughter or for sale at a market while they are within a Withdrawal Period.

Action: FSA

5.2.1 To investigate the feasibility of a survey of veterinary residues in imported eggs.

Action: VMD

5.2.2 To undertake a brand-name survey of imported farmed fish (other than salmon).

Action: VMD

6.3 To draft a letter to Defra's CVO and the Chief Executives of the VMD and FSA to express the Committee's concern at the possibility of cuts to the programme.

Action: DC and VMD

7.6 To prepare a report of the Matrix Ranking Subgroup Meeting, due to take place on 21 September 2009, for the VRC's October meeting.

Action: Secretariat

8.1.1 To move all of the meeting papers on the VRC Website for 2006 and before to an archive.

Actions: Secretariat

8.1.1 To supply 'traffic' figures for the VRC's Website to Members.

Actions: Secretariat

8.2.3 To express in the Annual Report the percentages for non-compliant samples to one decimal place. This should come immediately after the actual numbers in each result.

Action: Secretariat

8.2.4 To include information relating to the suspension of exports of prawns from Bangladesh in Chairman's Report section of the Annual Report.

Action: DC

8.2.5 To contact the Pesticides Residues Committee Secretariat to investigate the response it had received to the joint VRC/PRC letter requesting 3rd party surveillance results.

Actions: Secretariat

8.2.5 To draft a further letter to go to retailers and others that might have results of surveillance.

Actions: Secretariat

8.3.1 To redraft the VRC Open Meeting Agenda in line with the discussion at the meeting and to circulate the amended agenda for all to comment on before it was finalised.

Action: Secretariat and all

8.3.2 To contact the office of the Welsh Chief Veterinary Officer to see if she would attend the VRC's Open Meeting and talk on the local perspective on veterinary medicines issues.

Action: Secretariat

8.5.1 To circulate a 'good' copy of Stephen Lister's article on residues that had been accepted for publication in Poultry World to all Members, when it became available.

Action: SL and Secretariat

11.1 To include for discussion the format and content of the FSA's paper on residues and contaminants on the agenda for the December meeting.

Action: Secretariat

12.1.1 The Secretariat to canvass members for their preferences in relation to electronic circulation of meeting papers.

Action: Secretariat

12.2.1 To contact the Fera section that specialised in food contact materials over the issue of dyes in food-packaging materials.

Action: Fera

12.2.1 To check the food legislation over the use of dyes in packaging materials.

Action: FSA

Declaration of interests

DC reminded Members that they should declare any interests before particular agenda items. The Committee could then decide if it was appropriate for the Member to speak during the item.

1. Apologies for absence and attendance

1.1 Dr Shirley Price, Mr Mark Ranson, Mrs Gillian Asbury.

1.2 **DC** welcomed Reena Agrawal, who worked on the Non-Statutory Surveillance Scheme, who was attending the meeting as an observer.

2. Minutes of the last meeting

2.1 The minutes were agreed subject to two typographical amendments.

3. Matters arising**4. Statutory Surveillance Scheme**

VRC/09/13

4.1 GB Results

4.1.1 **SR** confirmed that sample collection was on target to meet the plan as normal.

4.1.2 The Committee heard that the Animal Medicines Inspectorate had completed its investigation into the chlortetracycline residues detected in pigs. The farmer had been feeding his pigs on medicated feed up to the point of slaughter, rather than withdrawal feed that should be used. This was the third non-compliant result for this farm in the last 18 months. Members questioned if prosecution should be undertaken. **SR** reported that the consignment pigs had not entered the food chain, resulting in a considerable loss of income. Intensified checks on the farmer's stock would continue.

4.1.3 Of four zeranol positives, three appeared, on the base of the statistical model, to be due to fungal contamination of feed. However, one did not fit this profile and was being investigated as possible abuse of this hormonally-active substance.

4.1.4 The tilmococin residues in a calf were still being investigated. However, it appeared that the young calf had been sold by one farmer for further fattening, but the buyer had then sent it to slaughter. The calf had been only 8 days into a 60 day withdrawal period for this medicine.

4.1.5 This issue of stock being sold for fattening and then going direct for slaughter was of concern to members. It was important that anyone sending stock for slaughter was sure of its treatment history and was in a position to supply up-to-date Food Chain Information (FCI). There was an increasing number of medicines with extended withdrawal periods. It was suggested that the current legislation only required declaration of treatments in the last 28 days, while the medicine in question had a 60 day withdrawal period. Therefore, the treatment might not be need to be mentioned under the FCI legislation. The FSA agreed to investigate time limits with respect to the requirements for FCI.

Action: FSA

4.1.6 The Committee suggested that John Fitzgerald may wish to include the issue of animals being submitted for slaughter before the end of Withdrawal Periods in upcoming presentations he would be making to the veterinary industry.

Action: Secretariat

4.1.7 **TB** reported that the England Implementation Group¹ had done a lot of work on declarations of FCI and offered to supply the group's papers to the Committee. The Committee also asked for a paper setting out the legal responsibilities to supply FCI of those submitting animals under Withdrawal Periods for sale at markets and to slaughterhouses.

Action: TB
Action: FSA

4.1.8 **SR** told the Committee that so far 242 samples of broiler liver had been analysed for nicarbazin. Some 6% had been non-compliant and the concentrations detected had been lower than in previous years. A nicarbazin residue at 4,200 µg/kg had been detected. The AMI were to go to the farm to investigate.

4.1.9 **SR** asked the Committee about the current format of the paper on Statutory Surveillance supplied by the VMD. Was it what the Committee required or would another format be more helpful. The Committee confirmed that the current format should be used.

4.2 NI Results

4.2.1 **DGK** said that there were further non-compliant samples detected for phenylbutazone in cattle. It was thought that vets were mistakenly prescribing this medicine under the 'cascade'. However, this is not allowed. The vets were also prescribing a short Withdrawal Period, which that compounded the error.

4.2.2 A sample of bovine liver had tested non-compliant for dexamethasone. Different medicines containing this substance had quite different Withdrawal Periods, so it was possible that an incorrect Withdrawal Period had been applied.

4.2.3 Thiouracil residues had been detected in a bovine urine sample. This thyrostatic substance is banned under EU law. It has been known to occur naturally in animals eating a significant amount of cabbage. A follow-up investigation on the farm, including resampling the bovine in question, found no more non-compliant results, nor evidence of cabbage being in the diet. It remains an unexplained non-compliance.

5. Non-Statutory Scheme

VRC/09/14

5.1 Results for 2009

5.1.1 **DG** reported that 338 samples had been collected and 675 analyses completed. One non-compliant sample had been detected. This was of

¹ The England Implementation Group is an independent advisory group appointed by the Government to drive forward delivery, in England, of the Animal Health and Welfare Strategy for Great Britain

chloramphenicol at a concentration of 0.48 µg/kg in golden threadfin bream from Vietnam.

- 5.1.2 Point of sale notices had been displayed in the outlets selling the affected fish. Also, the European Commission had been informed and issued a Rapid Alert. The VMD was waiting for some import documentation before the Defra's Chief Veterinary Officer wrote to his opposite number in Vietnam asking to be kept informed of any actions taken to avoid further such residues.
- 5.1.3 The Committee discussed the VMD's RASFF summary paper and how the different colours were helpful to follow the contents. **DG** indicated that the VMD was working on an analysis of all veterinary medicine RASFFs to be able to display the data in the most useful way. It was considered this analysis would be helpful to the Matrix Ranking Subgroup and in planning future Non-Statutory programmes.
- 5.1.4 **MS** reminded the Committee of Fera's 'FC24' – an online searchable database on food contaminants. FC24 pulled together relevant information from across the EU relating to food contaminants and residues, including metals, nitrates, veterinary drugs, pesticides, dioxins. It also has commodity and contaminant specific information on maximum contaminant/residue levels and exceedences published via the EU-wide rapid alert system for food and feed (RASFF).

5.2 Brand-name survey

- 5.2.1 The Committee discussed the options for a survey in 2009. It thought that there was some merit in a survey of eggs, as no data were currently available on the residues in imported eggs. However, it acknowledged that there could be difficulties in identifying and obtaining imported samples. It was agreed that the VMD would investigate the feasibility of a fact-finding pilot study.

Action: VMD

- 5.2.2 The Committee noted that it had not carried out a brand-name survey of fish for four years. Also, a wide range of farmed fish species were being imported and the previous survey had concentrated on salmon. It agreed that 100 samples from those allocated to the rolling programme should be collected as a brand-name survey. Shoppers would be instructed to concentrate on fish other than salmon.

Action: VMD

6. Non-Statutory Funding

VRC/09/15

- 6.1 **EC** outlined that the financial position in Defra was very tight. It was likely that in the next year, the budget for the Non-Statutory Scheme could be subject to a significant cut. He suggested that Committee could look again at the

scheme and consider if the shape of the programme, such as where the samples are collected and the main focus on banned substances, should change.

- 6.2 The Committee thought that the current budget to be the absolute minimum required to be able to provide reassurance to consumers. It recalled its business case, prepared 3 years previously, had set out the need for £1.75m to be able to undertake all of the surveillance the Committee considered desirable.
- 6.3 The Committee decided to write, in the first instance, to Defra's CVO and the Chief Executives of the VMD and FSA to express its concern at the possibility of cuts to the programme. It could consider writing to Defra Ministers if this letter was not successful. **EC** would draft a letter for **DC** to sign on behalf of the Committee.

Action: VMD and DC

7. Report of the Matrix Ranking Subgroup

VRC/09/16

- 7.1 **DW** explained that the Subgroup had proposed a change in the definition of 'High Exposure Groups' to remove the phrase 'not covered in dietary surveys'. The Subgroup considered that if a risk existed from a particular consumption of food containing residues, even if this pattern of consumption was picked up in a dietary survey, the risk would remain.
- 7.2 The Committee heard of developments in toxicology at Swansea University that had identified that there may be thresholds for some genotoxic carcinogens at low doses. This had previously been thought not to be the case.
- 7.3 **GC** also explained her discussion paper for amending the matrix ranking system. The paper discussed whether the "nature of the hazard" could be split into, for example:
1. Hazard identification
 - a. Assess the toxicological, pharmacological and microbiological properties of a substance
 - b. Identify the main tissue affected
 2. Hazard characterisation
 - a. Reversibility of toxicological endpoint
 - b. Relevance of toxicological endpoint to potential human exposure
 - c. Factors such as mechanism of action and shape of concentration-effect relationship
- 7.4 **DC** thanked her for the work she put into the paper. However, she reminded members that the Matrix Ranking system was a simple system that the

Committee hoped most people could understand. If it became more sophisticated it could make it less accessible and this must be borne in mind.

7.5 Work was also underway to ensure that the assessment of substances was fully documented. This is so that if choices were questioned, the Committee could explain its reasoning.

7.6 The Committee noted that the Matrix Ranking Subgroup would be meeting again on 21 September 2009. It was agreed that a report of its work would be presented at the VRC horizon-scanning meeting on 14 October.

Action: Subgroup and Secretariat

8. Communication Issues

VRC/09/17

8.1 Website

8.1.1 The Committee agreed that all of the meeting papers for 2006 and before should be moved to an archive, to reduce the amount of material on the VRC Website. The Secretariat confirmed that it had comprehensive figures for visitors to the site and agreed to circulate these to Members.

Actions: Secretariat

8.2 Annual Report

8.2.1 The Second draft of the Annual Report had been circulated to Members. It was acknowledged that the report was clearly written. However, some sections could be moved towards the front of the Report to give context to new readers of the report. In particular, the Committee's terms of reference could be moved to follow the explanation of the need for veterinary medicines.

8.2.2 The Committee heard that any further changes to the format could delay publication. It was agreed that the Committee would have the opportunity to make suggestions to the Communications Subgroup at the December 'Horizon-Scanning' meeting. The Subgroup would then make recommendations to the Committee at the March Meeting.

8.2.3 The Committee considered that the percentages for non-compliant samples should only be expressed to one decimal place. This should come immediately after the actual numbers in each result.

Action: Secretariat

8.2.4 DR suggested that the information relating to the suspension of exports of prawns from Bangladesh should be included in the report. It was agreed that this could be included in the Chairman's Report section.

Action: DC

- 8.2.5 The Committee was disappointed that only one set of 3rd party results had been received so far. The Secretariat agreed to contact the Pesticides Residues Committee Secretariat to investigate the response it had received. The Secretariat would also draft a further letter to go to retailers and others that might have results of surveillance.

Actions: Secretariat

8.3 Open Meeting for 2009

- 8.3.1 The Committee considered the draft agendas supplied by Shirley Price and the Secretariat. After a short discussion, the Secretariat agreed to take back the ideas and circulate an amended agenda for all to comment on before it was finalised.

Action: Secretariat and all

- 8.3.2 The Committee thought that as the meeting was in Cardiff, the Welsh Chief Veterinary Officer should be invited. She was acknowledged to be a very good public speaker and should be approached to give a local perspective on veterinary medicines issues.

Action: Secretariat

8.4 Open Meeting for 2010

- 8.5 The Committee agreed that the location for the Open Meeting would be York as suggested by the Communications Subgroup. The National Railway Museum was considered a suitable venue.

8.5 Articles in Trade Journals.

- 8.5.1 **SL** had had a double page article accepted for publication in Poultry World. It highlighted the problem of nicarbazin residues in poultry in the UK. It also featured a self-assessment quiz. It was agreed that a pdf of the article would be circulated to members when it was available. **DC** thanked **SL** for his hard work and acknowledged other such articles would be valuable to reduce the incidence of residues.

Action: SL and Secretariat

9. Draft report from the FVO Mission to the UK

VRC/09/18

- 9.1 **EC** explained that following receipt of the Food and Veterinary Office's draft report to the UK, the VMD had been co-ordinating responses from the various parts of the UK and other interested parties. Ten recommendations had been made. The UK's responses were being circulated within government and interested parties before being sent back to the FVO. It was part of the procedure that such comments could be included in the final report.

- 9.2 The Committee congratulated the UK on a very good report. It considered most of the recommendations relatively minor issues that did not compromise the UK's system of surveillance.

10. Update on the review of EU residues legislation VRC/09/19

- 10.1 The VMD and DARD were both working on implementing Directive 2008/97. This directive amended the EU's controls on substances that could be used to promote growth in farm animals.
- 10.2 The Regulation replacing 2377/90, 470/2008 had been published in the Official Journal. A copy had been circulated to all members at the start of the meeting. However, **EC** observed there was still a lack of clarity from the European Commission on how Reference Points for Action for unauthorised substances would work in practice.
- 10.3 There was to be a European Residues Working Group on 3 July. **EC** hoped that the timing of the renegotiation of Directive 96/23/EC would be discussed. Directive 96/23/EC sets out how veterinary residues surveillance should be undertaken in EU Member States.

11. FSA paper on surveys and research on contaminants + lead poisoning leaflet VRC/09/20

- 11.1 **AS** had noted that few questions had been raised by the FSA's paper at recent meetings. The FSA was content to provide the paper, but wished to know if the content and format was what the Committee required. It was agreed that the paper would be discussed at the VRC's December meeting.
Action: Secretariat
- 11.2 While lead is not a veterinary medicine, the VMD's Statutory Scheme was required to test for heavy metals. Lead poisoning was a problem on some farms and the FSA had produced guidance in the same way as it had done for nicarbazin. **AS** offered to provide colour copies for any members who wanted them.

12. AOB

12.1 Circulation of meeting papers

- 12.1.1 **DoR** questioned whether the Committee's meeting papers should be circulated in paper. This was not the case with other Committees, which had changed to electronic circulation. The Secretariat acknowledged that this would suit some, but not all Members. It was agreed that the Secretariat would canvass members for their preferences and circulate papers electronically to those preferring it.

Action: Secretariat

12.2 Malachite green in food contact materials

12.2.1 **DR** raised the issue of fish that had become contaminated with malachite green by contact with green paper hand towels. He noted that some paper-based packaging was still dyed green or blue. It was a possible source of contamination and asked how such materials could be used for food. **MS** indicated that Fera had a section that specialised in food contact materials and agreed to contact them over the issue. **AS** said that he would check the food legislation over the use of dyes in packaging.

Action: Fera

Action: FSA