

VMD INFORMATION NOTE ON THE SOIL ASSOCIATION REPORT – “TOO HARD TO SWALLOW” – RELEASED 4 JUNE 2001

The report raises a number of concerns about the results of the Veterinary Medicines Directorate's (VMD's) residues surveillance programmes. In particular, the method of reporting of the annual results and the human safety aspects of some of the residues detected poultry and egg samples.

1. The Soil Association assert that the VMD has deliberately misled the public over the number of “positive” samples of coccidiostats found in eggs and poultry. They base this on the quoting of an aggregate figure for all of the samples tested at the start of a section.

Comment

It is true that in the Annual Report on Surveillance for Veterinary Residues, we quote a headline percentage for each programme (red meat, poultry, fish, eggs, milk and game) that is an aggregate of the results of all of the samples tested. But, as with any report, care should be taken when quoting individual figures out of context of the whole document.

Following the aggregate figures, there are more detailed commentaries for individual compounds, such as nicarbazin. These quote the number of samples analysed for that compound and the number found ‘positive’. The results and the number of samples analysed for each compound/matrix are also laid out in tables. The Soil Association has quoted these results in their report. The VMD has presented its results in this way for several years (they are also on the internet) and this is the first time this kind of criticism has been made. It was also surprising because in a letter from Richard Young to Mike Rutter only three weeks earlier, the Soil Association had congratulated the VMD on its residues reports. Mr Young said: "We very much welcome the VMD's commitment to openness and transparency and we note from your excellent annual residue reports the steps you are taking to deal with the main problems in this area".

What the detailed figures describe over the past 2-3 years is an improving trend. The incidence of residues has halved since 1998, and the maximum level of residues found in 2000 was a quarter of the highest value found in 1999.

2. In its report, the Soil Association states that ‘nicarbazine has never been carefully evaluated for safety in humans’.

Comment

At its meeting in 1998 the Joint FAO/WHO Expert Committee on Food Additives set an Acceptable Daily Intake (ADI) for nicarbazine of 0-400 µg/kg of body weight or 24,000 µg for a person weighing 60kg. This represents the amount of nicarbazine which can be consumed every day over a lifetime without harm to human health. The highest concentration of nicarbazine ever detected under the VMD’s Statutory testing of poultry liver would result in an intake of 1,050 µg if a person ate a standard helping of 100g of liver. At the highest concentration detected, a consumer would need to eat 2.3kg of chicken liver every day of their life to reach the ADI.

The highest residue of nicarbazine detected in eggs since testing of eggs commenced under the VMD’s surveillance programmes is 900 µg/kg. A person would need to eat 533 eggs a day containing this residue to reach the ADI for nicarbazine.

| Year | Positive broiler samples | Total number of samples tested | Range of residues detected | Analyte |
|------|--------------------------|--------------------------------|----------------------------|-------------|
| 1998 | 44 (25.5%) | 172 | 100 -7,200 | Nicarbazine |
| 1999 | 47 (26%) | 178 | 100 - 10,500 | Nicarbazine |
| 2000 | 27 (15.6%) | 173 | 100 -2,800 | Nicarbazine |
| 2001 | 10 (12.2%) | 82 | 100 -2,500 | Nicarbazine |

| Year | Positive egg samples | Total number of samples tested | Range of residues detected | Analyte |
|------|----------------------|--------------------------------|----------------------------|-------------|
| 1998 | 7 | 175 | 10 - 320 | Nicarbazine |
| 1999 | 0 | 192 | - | Nicarbazine |
| 2000 | 4 | 162 | 26 - 73 | Nicarbazine |

3. The Soil Association claim in their report that ‘lasalocid has never been properly evaluated as a residue in food’.

Comment

In 1991, an EU ADI was set for lasalocid of 0-5 µg/kg of body weight or 300 µg for a person weighing 60kg. None of the residues detected in eggs or poultry samples tested under the VMD’s statutory scheme would have resulted in an intake in excess of this level.

In 2000, one sample of quail eggs tested under the non-statutory scheme contained a residue of lasalocid at a concentration of 5,400 µg/kg.. FSA toxicologists have stated that, although this residue would result in an exposure to a dose of lasalocid in excess of the ADI, they do not believe there would be a health risk to humans. Lasalocid is non-mutagenic, non-carcinogenic, non-teratogenic and has low acute toxicity.

| Year | Positive broiler samples | Total number of samples tested | Range of residues detected | Analyte |
|------|--------------------------|--------------------------------|----------------------------|-----------|
| 1998 | 3 | 160 | 62 - 140 | Lasalocid |
| 1999 | 0 | 160 | 0 | Lasalocid |
| 2000 | 0 | 183 | 0 | Lasalocid |
| 2001 | 0 | 74 | 0 | Lasalocid |

| Year | Positive egg samples | Total number of samples tested | Range of residues detected | Analyte |
|------|----------------------|--------------------------------|----------------------------|-----------|
| 1998 | 2 | 175 | 43-60 | Lasalocid |
| 1999 | 16 | 188 | 2-150 | Lasalocid |
| 2000 | 5 | 191 | 104-1,440 | Lasalocid |

4. The report raises several questions about the use of coccidiostats in intensive farming as well as the issues on reporting results. These issues need to be considered carefully by Government.

Comment

The VMD's reports have recognised that there are problems with residues of nicarbazin and lasalocid in broiler livers and in eggs. As well as establishing a cross industry group, including a consumer representative, to address the problem of contamination at feed mills, the likely cause of residues in eggs, the VMD has produced posters for compounders and farmers which remind them of the need for good practice in segregating medicated feeds and observing withdrawal periods.

The Food Standards Agency (FSA) issued a statement on 1 June in which it announced the intention of convening a meeting of interested parties, including the Soil Association, to discuss the issues raised in the report. The statement also refers to the need to seek advice from the independent Veterinary Residues Committee (VRC) which advises the FSA and the VMD on such matters. At its first meeting on 18 April 2001, the VRC agreed to set up a sub-group to consider the findings of surveillance programmes in relation to residues of coccidiostats in poultry and eggs. The Sub-Group will first meet on 22 June.

**Veterinary Medicines Directorate
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