

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 13

CRD07

ORIGINAL LANGUAGE

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

14<sup>th</sup> Session

(virtual)

3-7 and 13 May 2021

Comments of Japan

Japan appreciates the work done by the electronic Working Group chaired by New Zealand and co-chaired by Canada.

Japan would like to make following comments on each recommendation:

### a) Maximum levels

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Japan supports starting new work on developing Maximum Levels (MLs) for orange roughy and pink cusk-eel.

For Patagonian toothfish, Japan also supports postponing the discussion for a year and collecting the data of methylmercury for Patagonian toothfish to determine if ML should be established.

Considering the workload of this committee in taking the next step, Japan supports discontinuing the review of MLs for additional fish species.

### b) Sampling plans

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Japan supports further refinement of incremental sampling based on the weight/length class approach.

Japan appreciates the electronic Working Group for proposing the tissue area where the incremental sample is taken from whole fish based on weight classes (Table 3 of APPENDIX IV of CX/CF 21/14/11.), in which a certain fish group would be sampled from the muscle close to the tail. In Japan, large fish species, especially tuna, are imported in the form of gilled and gutted with the tail cut off on significantly many occasions (see the following figure). (Moreover, as previously submitted in response to the circular letter (CL 2020/52/OCS-CF), no parts are wasted in cutting of these kinds of fish, and all parts are utilized as food and feed (see Appendix).)

As we commented in CX/CF 20/14/11-Add.1, Japan would like to suggest that there should be an option for large fish such as tuna which incremental samples can be taken from the end portion (close to the tail) because the variation of methylmercury levels across different muscle tissues is limited in general as described in the paragraph 37 in APPENDIX IV of CX/CF 21/14/11 and the tail is the tissue area of the body where the muscles can be taken feasibly with limited damage on the fish in its imported form.

### c) Other risk-management measures

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Japan supports a literature review whether it is feasible to develop a guidance paper for risk management options.

### d) Establishment of the eWG

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Japan supports the establishment of the eWG for discussing the issues listed in the bullet point d. in paragraph 78 in CX/CF 21/14/11.



Figure: A wholesale market for tuna in Japan. Tuna is imported in the form of gilled and gutted with the tail cut off. (Fishery Agency. [https://www.jfa.maff.go.jp/j/kikaku/wpaper/h30\\_h/trend/1/zoom\\_p1\\_3\\_2\\_6-02.html](https://www.jfa.maff.go.jp/j/kikaku/wpaper/h30_h/trend/1/zoom_p1_3_2_6-02.html))

(Appendix)

### 1. Tuna Species <sup>\*1, 2, 3</sup>

	Max. Fork Length (m)	Max. Body Weight (kg)	Lifespan (years)	Use	Market Price (Tokyo, 2019), (USD/kg)
Bluefin tuna	ca 2.5	ca 400	>20	sashimi	27.3
Southern bluefin tuna	ca 2.4	ca 260	>20	sashimi	16.8
Bigeye tuna	ca 2.5	ca 210	>15	sashimi, canning	9.3
Yellowfin tuna	ca 2.4	ca 200	7 – 10	sashimi, canning	7.7
Albacore	ca 1.2	ca 30	>16	canning, sashimi	9.9

### 2. Global Market Trend (2017) <sup>\*4</sup>

**Export Volume**

Total: 84.5  
<10000 t>

**Export Value**

Total: 3040.6  
<USD million>

### 3. Tuna Cutting in Japan <sup>\*5, 6, 7</sup>, e.g., Fresh bluefin tuna of ca 200 kg of body weight

- Large fresh tuna is cut into pieces by 2 people using tuna knife with a blade length of 1.5 m. Large frozen tuna is cut with an electric saw.
- Byproducts of tuna, such as bone and skin, are utilized as fishmeal and pet foods. No waste occurs from tuna.

(1) Removal of head, and then, cutting from the tail toward the head, keeping the knife close to the bone.

(2) Cutting to separate the top loin and bottom loin from the backbone.

(3) Two loin sections.

(References)

1) National Research Institute of Far Seas Fisheries, Japan Fisheries Research and Education Agency. <http://fsf.fra.affrc.go.jp/maguro20/maguro20.htm> (accessed 2020.2.26)

2) Japan Tuna Fisheries Co-operative Association. <https://www.japantuna.net/know/dictionary/?id=1497844423-110024> (accessed 2020.2.21)

3) Tokyo Metropolitan Central Wholesale Market. <http://www.shijou-tokei.metro.tokyo.jp/> (accessed 2020.3.2)

4) FAO. 2019. FAO year book. Fishery and Aquaculture Statistics 2017.