CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 7(g) **CRD11**

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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CLASS B – PRIMARY FOOD COMMODITIES OF ANIMAL ORIGIN

COMMON DEFINITION OF EDIBLE ANIMAL TISSUES FOR THE ESTABLISHMENT OF MAXIMUM RESIDUE LIMITS OF PESTICIDES AND VETERINARY DRUGS FOR COMPOUNDS WITH DUAL USES AS PESTICIDES AND VETERINARY DRUGS FOR USE BY THE CODEX COMMITTEE ON PESTICIDE RESIDUES AND THE CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS (AT STEP 4)

Comments submitted at Step 3 in reply to CL 2019/05-PR
submitted by European Union, Japan, Kenya and Nigeria

European Union

European Union Competence
European Union Vote

The European Union (EU) would like to thank the Electronic Working Group (eWG) on the revision of the Classification of food and feed chaired by the United States of America and co-chaired by the Netherlands in collaboration with the eWG of CCRVDF on definition of edible tissues chaired by Kenya and co-chaired by New Zealand for the preparation of the draft on the revision of the Codex Classification of Foods and Animal Feeds.

In reply to the questions raised by the eWG, the EU has the following positions:

1. CCRVDF uses the term muscle, while CCPR uses meat. Can these terms be consolidated? If so, what is the appropriate term to use?

The EU is of the opinion that “muscle” is the appropriate term to use. This also corresponds to the terminology used in the EU.

The EU supports the definition of muscle as follows: “Muscle is the skeletal tissue of an animal carcass or cuts of these tissues from an animal carcass that contains interstitial and intramuscular fat. The muscular tissue may also include bone, connective tissue, tendons as well as nerves and lymph nodes in natural portions. It does not include edible offal or trimmable fat”. The EU proposes the following wording for the annotation “fat”: “for monitoring and regulatory purposes, muscle (including interstitial and intramuscular fat) is to be analyzed and the result compared to the sum of the [MRL for muscle × (1-fraction fat)] + [MRL fat × fraction fat], based on a determination of the fraction of fat present in the muscle”.

2. Is the proposed consolidated edible offal definition acceptable: “Those parts of an animal, apart from meat from the carcass, that are considered fit for human consumption”?

The EU supports the proposed description. The EU notes that the term “meat” should be replaced if it is agreed to use the term “muscle”. Within the definition, the EU proposes using the term “skeletal muscles” instead of “meat from the carcass” to clarify that also hearts are covered by edible offal.

3. Should a consolidated edible offal hierarchical classification be used for CCPR and CCRVDF and how can this be accomplished?

The EU would welcome a consolidated classification to be used by CCPR and CCRVDF without prejudice to the current extrapolation rules. The EU acknowledges that in veterinary medicine studies contain more information, for instance on metabolism, compared to studies on pesticides. Also the administration of the substances may be different. Therefore, although extrapolation rules may differ, a common hierarchical structure should be envisaged.

4. Can animal extrapolation rules be developed for both CCPR and CCRVDF using representative animal edible offal tissues?

The EU welcomes the development of common rules. The EU however considers that in practice this may not always be feasible given the different circumstances for findings of veterinary medicinal products (administered to animals on purpose) and pesticides residues present in animal products resulting from feed. These specific circumstances should be reflected in the first place and extrapolation rules only harmonised if there no contradictions with those.

5. What is the best procedure to establish harmonized descriptors? Examples include different descriptors such as “fat”, “fat with skin”, “fat/skin” and “skin”.

The EU needs more time to decide on the appropriate descriptors. In particular, JECFA and JMPR should be consulted on the matter. As a preliminary comment, the EU notes that descriptors vary among animal species. For instance, for ruminants it would be appropriate to use “fat” as a descriptor, whereas for pigs and poultry also skin is relevant and the descriptor could be “fat with skin”.

6. Should honey be included in the Classification system as a miscellaneous commodity? If so, should honey be included in Class B (primary food commodities of animal origin) or Class E (processed food of animal origin?

The EU supports the inclusion of honey in Class B as a primary food commodity of animal origin. It is however acknowledged that often residue definitions for honey are more likely to be similar to those of plant commodities. This would need to be taken into account when residue definitions are established.

Japan

We appreciate the efforts of the USA and the Netherlands as chair and co-chair of the EWG on the revision of the Codex Classification of Food and Animal Feed and thank for the opportunity to comment on the draft discussion paper. We would like to submit the following comments.

1. CCRVDF uses the term muscle, while CCPR uses meat. Can these terms be consolidated? If so, what is the appropriate term to use?

(Pesticides)

For fat-soluble pesticides, MRLs for meat are recommended on a basis of the residues in fat and followed by the term “fat”. For checking compliance with MRLs, the trimmable fat shall be analyzed for residues for comparison with MRLs.

For not-fat-soluble pesticides, MRLs for meat are recommended on a basis of the residues in muscle.

(Veterinary drugs)

For veterinary drugs, maximum residue limits are estimated on a basis of residues in both muscle and fat separately.

If CCRVDF and CCPR use the same term, we need to discuss not only appropriate term but also

(1) unharmonized commodity or tissue,

(2) portion to be analyzed in fat-soluble compound, and

(3) how to harmonize Codex MRL values for pesticides and veterinary drugs.

The exception of CX/PR 19/51/12 Appendix Ⅱ

Pesticides	Commodity	MRL (mg/kg)	Note	Veterinary Drug			Harmonization
				Species	Tissue	MRL (μg/kg)	
Cyfluthrin/beta-cyfluthrin	Meat (from mammals other than marine mammals)	0.2	(fat)	Cattle	Fat	200	yes: wider coverage shall prevail
				Cattle	Muscle	20	
Cyhalothrin (includes lambda-cyhalothrin)	Meat (from mammals other than marine mammals)	3	(fat)	Cattle	Muscle	20	
				Cattle	Fat	400	*No*
				Pig	Muscle	20	
				Pig	Fat	400	*No*
				Sheep	Muscle	20	
				Sheep	Fat	400	*No*
Cypermethrin (including alpha- and zeta- cypermethrin)	Meat (from mammals other than marine mammals)	2	(fat)	Cattle	Muscle	50	
				Cattle	Fat	1000	*No*
				Sheep	Muscle	50	
				Sheep	Fat	1000	*No*
Deltamethrin	Meat (from mammals other than marine mammals)	0.5	(fat)	Cattle	Muscle	30	
				Cattle	Fat	500	yes: wider coverage shall prevail
				Sheep	Muscle	30	
				Sheep	Fat	500	yes: wider coverage shall prevail
	Poultry meat	0.1	(fat)	Chicken	Fat	500	*No*
				Chicken	Muscle	30	
Thiabendazole	Cattle meat	0.1		Cattle	Muscle	100	yes

(fat):(for meat) The MRL/EMRL applies to the fat of meat.

2. Is the proposed consolidated edible offal definition acceptable: “Those parts of an animal, apart from meat from the carcass, that are considered fit for human consumption”.

Japan can agree with the proposed definition.

3. Should a consolidated edible offal hierarchical classification be used for CCPR and CCRVDF and how can this be accomplished?

(Pesticides)

For pesticides, recently, MRLs are set on edible offal by selecting the higher residue concentration in liver and kidney in order to cover any organs included in “edible offal”.

For exposure assessment, STMRs and HRs are separately estimated for liver and kidney.

(Veterinary drugs)

For veterinary drugs, MRLs are estimated separately for kidney and liver on the a basis of residues in their tissue.

If CCRVDF and CCPR use the same term, we need to discuss not only appropriate term but also

(1) unharmonized commodity or tissue, and

(2) how to harmonize Codex MRL values for pesticides and veterinary drugs.

The exception of CX/PR 19/51/12 Appendix Ⅱ

Pesticides	Commodity	MRL (mg/kg)	Note	Veterinary Drug			Harmonization
				Species	Tissue	MRL (μg/kg)	
Cyfluthrin/beta-cyfluthrin	Edible offal(mammalian)	0.02		Cattle	Liver	20	yes: wider coverage shall prevail
				Cattle	Kidney	20	yes: wider coverage shall prevail
Cyhalothrin (includes lambda-cyhalothrin)	Kidney of cattle, goats, pigs and sheep	0.2		Cattle	Kidney	20	*No*
				Pig	Kidney	20	*No*
				Sheep	Kidney	20	*No*
	Liver of cattle, goats, pigs and sheep	0.05		Cattle	Liver	20	*No*
				Pig	Liver	20	*No*
				Sheep	Liver	50	yes
Cypermethrin (including alpha- and zeta-cypermethrin)	Edible offal (mammalian)	0.05		Cattle	Liver	50	yes: wider coverage shall prevail
				Cattle	Kidney	50	yes: wider coverage shall prevail
				Sheep	Liver	50	yes: wider coverage shall prevail
				Sheep	Kidney	50	yes: wider coverage shall prevail
Deltamethrin	Kidney of cattle, goats, pigs and sheep	0.03	(*)	Cattle	Kidney	50	*No*
				Sheep	Kidney	50	*No*
	Liver of cattle, goats, pigs and sheep	0.03	(*)	Cattle	Liver	50	*No*
				Sheep	Liver	50	*No*
Thiabendazole	Cattle kidney	1		Cattle	Kidney	100	*No*
	Cattle liver	0.3		Cattle	Liver	100	*No*

(*): At or about the limit of determination.

4. Can animal extrapolation rules be developed for both CCPR and CCRVDF using representative animal edible offal tissues.

(Pesticides)

Pesticide residues in animal commodities arise from animal feeds containing pesticide residues in addition to use of ectoparaciticides. Unless animal species are specified, feed can be given to various livestock. Livestock feeding studies are generally conducted on dairy cattle and/or laying hens. When a pesticide is approved for use as an ectoparaciticide and on feed crops or on crops whose by-product(s) can be fed to livestocks, maximum residue levels are estimated separately from feeds and from external uses; and higher values are recommended as MRLs. CCPR extrapolates to mammal tissues wherever cattle study(ies) is (are) available since the discussion on the issue at its 35th session (2003). The same applies to poultry and hens.

(Veterinary drugs)

Veterinary drugs may be used for specified animals and the dose of veterinary drugs varies depending on animals.

While Animal extrapolation rules on veterinary drugs are under consideration on CCRVDF EWG.

- Japan will be watching the progress of CCRVDF discussion.

5. What is the best procedure to establish harmonized descriptors? Examples include different descriptors such as “fat”, “fat with skin”, “fat/skin” and “skin”.

- Japan thinks the terms of “fat”, “fat with skin”, “fat/skin” and “skin” can be consolidated. (see CX/PR 19/51/12 Appendix Ⅲ)

6. Should honey be included in the Classification system as a miscellaneous commodity? If so, should honey be included in Class B (primary food commodities of animal origin) or Class E (processed food of animal origin)?

- Japan thinks centrifuged honey can be included in Class B. Because honey is nearly in its natural state.

  Honey is obtained from beehive by centrifugation. For sales to customers centrifuged honey will be bottled and pasteurized.

(Reference)

The definitions of Class B and E are below.

Class B:

The term“primary food commodity” means the product in or nearly in its natural state, intended for processing into food for sale to the consumer or intended for sale to the consumer as a food without further processing. It includes irradiated primary food commodities and products after removal of certain parts of the animal tissue, e.g. bones.

Class E:

The term “secondary food commodity” means a “primary food commodity” which has undergone simple processing, such as removal of certain portions, drying (except natural drying), husking, and comminution, which do not basically alter the composition or identity of the product. Natural field dried mature crops or parts of crops such as pulses, bulb onions or cereal grains are not considered as secondary food commodities.

Kenya

Comment: Kenya supports the principle of harmonization of edible offal tissue to avoid confusion for enforcement especially when establishing MRLs for dual-purpose compounds.

Rationale: This will be important to avoid confusion that could lead to trade disruption and have impact on public health when establishing MRLs for dual-purpose compounds

Nigeria

Nigeria supports the definition of word “meat” to avoid ambiguity.