

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 8

CX/RVDF 21/25/9

November 2020

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

25<sup>th</sup> Session  
(Virtual)

12-16 and 20 July 2021

### DISCUSSION PAPER ON DEFINITION OF EDIBLE OFFAL AND ANY OTHER ANIMAL TISSUES OF RELEVANCE, FOR THE PURPOSE OF HARMONIZATION AND THE ELABORATION OF MAXIMUM RESIDUE LIMITS

(Prepared by the Electronic Working Group  
chaired by the Kenya and co-chaired by New Zealand)

#### BACKGROUND

1. At the 24<sup>th</sup> session of the Codex Committee on Residues of Veterinary Drugs (CCRVDF24, April 2018), the Committee agreed<sup>1</sup> to establish an Electronic Working Group (EWG) chaired by Kenya and co-chaired by New Zealand to coordinate with the EWG on the revision of the *Classification on Food and Feed* of the Codex Committee on Pesticide Residues (CCPR) in order to harmonize a common definition for edible offal and for any other edible animal tissues of relevance.

2. The EWG conducted two rounds of comments.

- The first round was launched from October 2018 to January 2019 and involved consultation with members of both EWGs which resulted in a discussion paper prepared jointly by the Chairs and Co-Chairs of both EWGs containing a set of conclusions and recommendations for consideration by the 51<sup>st</sup> Session of the Codex Committee on Pesticide Residues (CCPR51, April 2019). This discussion paper<sup>2</sup> and the discussions that took place at CCPR51 are available in Appendices I and II for convenience.
- The second round was launched from October 2019 to January 2020 and involved consultation with members of the CCRVDF EWG based on the outcomes of the discussion at CCPR51. The summary of the discussion that took place at CCPR51 can be found in the report of that session (REP19/PR) on the CCPR51 webpage.

Both rounds of discussions included comments received from the EWG CCPR Chair together with other relevant Codex documents.

#### Discussions

##### First round

3. In the first round, comments were received from four countries<sup>3</sup> and shared with the CCPR EWG Chair for consideration during CCPR51.

4. Based on the submissions received in the first round, there was support for harmonization for the definition of edible offals with some participants in favor of the proposed definition by CCRVDF24 i.e. *“those parts of an animal, apart from meat from the carcass, that are considered fit for human consumption”*.

5. However, concerns were expressed with regard to setting of maximum residue limits (MRLs), which some participants proposed that this should be discussed on a case-by-case basis. Concerns were also expressed with regard to extrapolation of MRLs between species as proposed in the document. With proposals that this should be taken on board by the other EWG on extrapolation established<sup>4</sup> by CCRVDF24 and chaired by the European Union (EU).

<sup>1</sup> REP18/RVDF, paras. 85-95

<sup>2</sup> The discussion paper (CX/PR 19/51/12 and the report (REP19/PR) are available on the CCPR51 webpage:

<http://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCPR&session=51>

<sup>3</sup> Egypt, France, Iran and Republic of Korea

<sup>4</sup> The report of the CCRVDF EWG/Extrapolation is available on the CCRVDF52 webpage:

<http://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCRVDF&session=25>

**Second round**

6. The CCRVDF EWG resumed discussions after receiving the report of CCPR51.

7. The CCRVDF EWG members were presented with the document prepared by the CCPR EWG in collaboration with the CCRVDF EWG i.e. CX/PR 19/51/12.

8. The Chair and Co-Chair of the CCRVDF EWG advised participants to consider the conclusions and recommendations in paragraphs 18 and 19 of CX/PR 19/51/12. Participants were further advised to take note of the deliberations contained in paragraphs 157 to 171 of REP19/PR and provide comments / responses to the questions in paragraph 19 and the proposed alternative definition of edible offals in paragraph 164 of REP19/PR.

9. The CCRVDF EWG considered the questions in paragraph 19 and used the information contained in REP19/PR to inform its discussion:

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

10. The CCRVDF EWG expressed support for harmonization of terms between CCRVDF and CCPR and there was preference for use of the term “muscle” since the term “meat” is generally defined in terms of all edible tissues would include offal.

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

11. The CCRVDF EWG considered the two definitions for edible offal as proposed in the report of CCPR51:

- a. *“The organs of the thoracic and abdominal cavities, the brain, the muscular tissues of the head, the tissues of the diaphragm, the tail, the feet or tendons”.*
- b. *“Those parts of an animal, apart from the meat from the carcass / skeletal muscle and fat, that are considered fit for human consumption”.*

12. There was general consensus on the use of the term “skeletal muscle” and the CCRVDF EWG was in agreement with the revised definition option ‘b’ in paragraph 11 with slight amendment to read *“Those parts of an animal, apart from the skeletal muscle and fat, that are considered fit for human consumption.”* This was considered to be much clearer and very similar to what was discussed at CCRVDF24.

13. However, it was noted that the use of this definition may require further consolidation of definition of skeletal muscle between CCRVDF and CCPR and consideration of the common portion to be analyzed as contained in the *Classification of Food and Feed (CXA 4-1989)*.

14. The CCRVDF EWG took cognizance of the definitions contained in the *Glossary of Terms and Definitions (Residues of Veterinary Drugs in Foods)* (CXA 5-1993) and the portion of the commodity to which the MRLs apply for fat and muscle;

- **Fat:** *The lipid-based tissue that is trimmable from an animal carcass or cuts from an animal carcass. It may include subcutaneous, omental or perirenal fat. It does not include interstitial or intramuscular carcass fat or milk fat.*

*Portion of the commodity to which the MRL applies:* The whole commodity. For fat-soluble compounds the fat is analyzed and MRLs apply to the fat. For those compounds where the trimmable fat is insufficient to provide a suitable test sample, the whole commodity (muscle and fat but without bone) is analyzed and the MRL applies to the whole commodity (e.g., rabbit meat).

- **Muscle:** *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.*

*Portion of the commodity to which the MRL applies:* The whole commodity without bones.

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

15. There was general acceptance by the CCRVDF EWG for consolidation of edible offal hierarchical classification to be used for CCRVDF and CCPR since this would be beneficial to both committees. It was noted that establishing MRLs for individual edible offal tissues would not be practical due to availability of data and the impact on existing MRLs, but the use of a hierarchical classification for edible offal may be a beneficial alternative approach.

**Question 4:** *Can animal extrapolation rules be developed for both CCPR and CCRVDF using representative animal edible offal tissue?*

16. The CCRVDF EWG took cognizance of the general support to for harmonization of extrapolation rules for both CCPR and CCRVDF using representative animal edible offal tissue. However, concerns were expressed regarding the practicability of harmonization especially when considering; the methodology to be used; the different circumstances that exist for veterinary drugs and pesticides the extrapolation rules and procedures that may apply; and the existence of an EWG of CCRVDF on extrapolation of MRLs in animal species.

17. In this regard, the CCRVDF EWG was in concurrence with the decision of CCPR51 to rely on separate extrapolation rules for CCRVDF and CCPR due to the differences between veterinary drug and pesticide exposure in animals.

**Question 5:** *What is the best procedure to establish a harmonized descriptors: examples include different descriptors such as "fat", "fat with skin", "fat/skin" and "skin"*

18. The CCRVDF EWG took note of the comments presented on the need to have harmonized descriptors. When considering harmonized descriptors, it is useful to take into account the need for the different descriptors used by JECFA and JMPR.

19. It was proposed that an official mechanism to discuss MRLs for compounds with dual use in food of animal origin should be created between CCPR and CCRVDF and incorporated in the Procedural Manual.

20. The CCRVDF EWG concurred with the recommendation of CCPR51 to request guidance from JECFA/JMPR on the appropriate descriptors.

**Question 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)*

21. The Chair and Co-Chair of the CCRVDF EWG took note of the comments presented by participants, however, this question was not applicable to the discussion of this EWG.

## Conclusions

22. Based on the discussion paper prepared in collaboration with the Chair and Co-Chair of the CCPR EWG on the revision of the Classification (Appendix I), the report of CCPR51 (Appendix II) and the responses received from the first and second round of discussions, the following could be considered by CCRVDF and CCPR:

1. There is preference for the use of the term "muscle" in the definition as opposed to "meat" which is perceived to include all edible tissue including offal. Concerns expressed by delegations to the CCPR51 regarding implications of harmonization of terms could be addressed by the committee making reference to the *Glossary of Terms and Definitions (Residues of Veterinary Drugs in Foods) (CXA 5-1993)* which has clear definitions and guidance on the *Portion of the commodity to which the MRL applies*.
2. The preferred definition for edible offal is *"Those parts of an animal, apart from the skeletal muscle and fat, that are considered fit for human consumption."* which the CCRVDF EWG considered appropriate for use by both committees.
3. The consolidation of edible offal hierarchical classification to be used for CCRVDF and CCPR was acceptable and considered to be beneficial, however the modalities of how this would be achieved would require further consideration.
4. There was concurrence with the recommendation of CCPR51 to rely on separate extrapolation rules for CCRVDF and CCPR due to the differences between veterinary drug and pesticide exposure in animals.
5. CCRVDF may need to consider how to address the extrapolation of residues of veterinary drugs when the edible tissues are offal.
6. There was concurrence with the recommendation of CCPR51 to request guidance from JECFA / JMPR on the appropriate descriptors.

**Recommendations**

23. Codex members and observers are invited to reflect on the following recommendations for consideration by CCRVDF25:

**Definition for edible offal for adoption:**

***Those parts of an animal, apart from the skeletal muscle and fat, that are considered fit for human consumption***

1. CCRVDF to adopt the definition for edible offal and to incorporate it in the *Glossary of Terms and Definitions (Residues of Veterinary Drugs in Foods) (CXA 5-1993)*.
2. CCRVDF to recommend CCPR to adopt the same definition for consistency and facilitation of MRLs for dual compounds.

**Classification of Food and Feed (CXA 4-1989)**

3. CCRVDF and CCPR to explore the possibility to develop a mechanism for consolidation of edible offal hierarchical classification in the *Classification of Food and Feed (CXA 4-1989)* while considering that different extrapolation rules would apply for residues of pesticides and veterinary drugs for edible animal tissues (including offal) and to other food animal species.

**Extrapolation of MRLs for edible offal**

4. The CCRVDF EWG on extrapolation should continue its work and develop rules applicable to residues of veterinary drugs.
5. CCRVDF to develop and apply a suitable approach for the extrapolation of residues of veterinary drugs in edible offal when appropriate.
6. CCPR and CCRVDF to consider setting MRLs for edible offal based on extrapolation rules rather than setting MRLs for individual edible offal tissues.

**Other Matters:*****Food descriptors – Coordination between JECFA/JMPR***

7. CCRVDF to seek guidance from JECFA on appropriate descriptors, such as “fat”, “fat with skin”, “fat/skin”, “skin”, and to recommend JECFA to coordinate with JMPR on this matter

Discussion paper presented at CCPR51  
within the framework of the revision of the Classification of Food and Feed (CXA 4-1989)

Agenda Item 7(g)

CX/PR 19/51/12  
February 2019

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON PESTICIDE RESIDUES**

**51<sup>st</sup> Session**

**Macao SAR, P.R. China, 8-13 April 2019**

**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**

**(Prepared by the CCPR Electronic Working Group on the Revision of the Classification  
chaired by the United States of America and co-chaired by the Netherlands  
in collaboration with the**

**CCRVDV Electronic Working Group on Definition of Edible Animal Tissues  
chaired by Kenya and co-chaired by New Zealand)**

**[CX/PR 19/51/12](#)**

**Available at:**

**<http://www.fao.org/fao-who-codexalimentarius/meetings/detail/jp/?meeting=CCPR&session=51>**

**APPENDIX II**

**Outcomes of the discussion of CCPR51  
on a common definition of edible animal tissues (including offal) for the establishment of  
MRLs for pesticides and veterinary drugs for compounds with dual uses  
within the framework of the revision of the *Classification of Food and Feed* (CXA 4-1989)**

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME****REPORT OF THE 51<sup>st</sup> SESSION OF THE  
CODEX COMMITTEE ON PESTICIDE RESIDUES****Macao SAR, P.R. China, 8 - 13 April 2019****[REP19/PR](#)****Available at:****<http://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCPR&session=51>****(please refer to paragraphs 157 – 179)**

**APPENDIX III****LIST OF PARTICIPANTS**

<b>Chair</b> <b>Kenya</b> Allan Azegele Deputy Director of Veterinary Services Directorate of Veterinary Services Ministry of Agriculture, Livestock, Fisheries and Co-operatives	<b>Vice-Chair</b> <b>New Zealand</b> Warren Hughes Principal Adviser ACVM Ministry for Primary Industries
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<b>MEMBER COUNTRY / ORGANIZATION<sup>5</sup></b>	<b>OBSERVER ORGANIZATIONS<sup>1</sup></b>
1. Argentina	1. ICGMA <sup>6</sup>
2. Australia	2. CropLife International
3. Brazil	
4. Canada	
5. Chile	
6. Congo	
7. Costa Rica	
8. Egypt	
9. Ethiopia	
10. Finland	
11. France	
12. Germany	
13. Hungary	
14. India	
15. Iran	
16. Japan	
17. Kazakhstan	
18. Kenya	
19. Mexico	
20. New Zealand	
21. Nigeria	
22. Peru	
23. Republic of Korea	
24. Sierra Leon	
25. South Africa	
26. Thailand	
27. United Kingdom	
28. United States of America	

<sup>5</sup> Please contact the focal point of the Member Country or Observer Organization for the details of the delegates. The list of Codex contact points for members and observers are available from the Codex website at:  
<http://www.fao.org/fao-who-codexalimentarius/about-codex/members/en/>  
<http://www.fao.org/fao-who-codexalimentarius/about-codex/observers/observers/obs-list/en/>

<sup>6</sup> International Council of Grocery Manufacturers Association