TO: Codex Contact Points  
Contact Points of international organizations having observer status with Codex

FROM: Secretariat, Codex Alimentarius Commission,  
Joint FAO/WHO Food Standards Programme

SUBJECT: Request for comments on the recommendations for edible offal and other animal tissues of relevance for the purpose of harmonization and elaboration of maximum residue limits for compounds with dual uses

DEADLINE: 5 June 2021

BACKGROUND
1. For background information, please refer to document CX/RVDF 20/25/9¹.
2. In view of the postponement of 25th Session of the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF25) to 12-16 July 2021, and the possible holding of this Session in virtual mode, Codex members and observers are encouraged to submit comments in reply to this CL in order to facilitate the consideration of this matter at the upcoming CCRVDF.

REQUEST FOR COMMENTS
3. Codex members and observers are invited to submit comments on the recommendations for edible offal and other animal tissues of relevance for the purpose of harmonization and elaboration of MRLs for compounds with dual uses (either as pesticides or veterinary drugs) as described in paragraph 23 of CX/RVDF 20/25/9 as follows:
   a. whether you concur with the recommendations,
   b. whether there is room for improvements on the current proposals, if so,
   c. provide additional proposals for consideration by CCRVDF25 to facilitate the harmonization / establishment of MRLs for compounds with dual uses
4. In submitting comments, Codex members and observers are invited to consider:
   • the information provided in CX/RVDF 20/25/9 in particular the conclusions in paragraph 22 and the background paper in Appendix I,
   • the discussion held and recommendations made by the 51st Session of the Codex Committee on Pesticide Residues (CCPR51, 2019) in relation to this matter as described in REP19/PR² (paragraphs 157-177).

Note: A CL 2020/13-PR³ is soliciting comments on the harmonization of meat mammalian MRLs between CCPR and CCRVDF (Classification of Food and Feed: Class B – Primary Commodities of Animal Origin) in reply to the request of CCPR52 on the consolidations of the terms “muscle” and “meat” for the purposes of harmonization and establishment of MRLs for compounds with dual uses (REP19/PR, paragraph 162). Codex members and observers may wish to check CL 2020/13-PR when providing replies to CL 2021/6-RVDF⁴.
5. For convenience the recommendations are reproduced in the Annex to this CL.

² http://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCPR&session=51  
GUIDANCE ON THE PROVISION OF COMMENTS

6. Comments should be submitted through the Codex Contact Points of Codex members and observers using the OCS.

7. Contact Points of Codex members and observers may login to the OCS and access the document open for comments by selecting “Enter” in the “My reviews” page, available after login to the system.

8. Contact Points of Codex members and observers organizations are requested to provide proposed changes and relevant comments/justifications on a specific paragraph (under the categories: editorial, substantive, technical and translation) and/or at the document level (general comments or summary comments). Additional guidance on the OCS comment categories and types can be found in the OCS Frequently Asked Questions (FAQs)\(^5\).

9. Other OCS resources, including the user manual and short guide, can also be found on the Codex website\(^6\).

10. For questions on the OCS, please contact Codex-OCS@fao.org.

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**ANNEX**

**RECOMMENDATIONS FOR EDIBLE OFFAL AND OTHER ANIMAL TISSUES OF RELEVANCE FOR THE PURPOSE OF HARMONIZATION AND ELABORATION OF MAXIMUM RESIDUE LIMITS FOR COMPOUNDS WITH DUAL USES**

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.