

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 7(g),9,10,11,12,13

CRD20

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

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COMMENTS Submitted by Thailand

Agenda item 7(g) Class B – Primary food commodities of animal origin common definition of edible animal tissues for the establishment of MRLs of pesticides and veterinary drugs for compounds with dual uses as pesticides and veterinary drugs for use by CCPR and CCRVDF

1. Definition of “muscle” (CCRVDF) and “meat” (CCPR)

Thailand supports the use of definitions of meat (from mammals other than marine mammals) and poultry meat of CCPR. In trade, meat of mammals and poultry can be sold in the forms of lean meat or meat with fat. The definitions specified by CCPR cover both forms as well as other possible forms prepared for wholesale or retail distribution in ‘fresh’ state. These definitions may be considered as broader than of CCRVDF and also easily understood as the samples for analysis can be obtained directly from the products in trade.

2. Definition of “fat”

Thailand supports the definition of fat used by CCRVDF which is more detailed than of CCPR. “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.”

3. MRL recommendation for fat soluble

Thailand does not oppose the use of refined approach and the sentence describing the calculation of MRLs proposed by the working group. The sentence is, however, quite complicated and the derivation of adjusted concentration is still not very clear to us. Anyhow, we are of the opinion that the value of adjusted concentration should be representatives of various species of animals.

We propose the development of a clear interpretation of this sentence and its application as it will be necessary to enable the harmonized practice in establishment of MRLs for fat-soluble chemicals.

4. Definition of edible offal

Thailand agrees with the definitions were used for edible offal by CCPR that were “Edible tissues and organs other than muscles (=meat) and animal fat from slaughtered animals as prepared for wholesale or retail distribution”. Moreover, Thailand would like to propose addition explanation from context of footnote no.1 that expressed in discussion paper on edible offal and other animal tissues definition (CX/PR 19/51/12) as follows: “‘Edible offal’ is considered to cover internal organs, mainly comprised of the thoracic organs (lungs with the trachea, oesophagus, heart), abdominal tripes (intestines, stomachs), kidneys, liver, abdominal fat, spleen, gizzard and pelvic organs (uterus, ovaries, bladder; while the term ‘external organs’ is used to refer to the head {eyes, muzzle, ears, tongue, brain, head meat (cheek Meat), thymus}, tail, trotters (feet, legs, claws), udder, pizzles and testicles.”

In Standard for Luncheon Meat (Codex Stan 89-1981) and Standard for Cooked Cured Chopped Meat (Codex Stan 98-1981) the definition of edible offals do not cover certain organs. Thailand is of view that since these standards are for specific commodities and products, depending on the objectives of such standards, the definitions can be specified differently and should not be used as general definitions.

5. Hierarchical classification and animal extrapolation rule

Thailand does not oppose if CCRVDF deems it appropriate to apply use hierarchical classification and principle extrapolation used by CCPR in the risk management process.

6. Establish harmonized descriptors, Examples include different descriptors such as “fat”, “fat with skin”, “fat/skin” and “skin”

Thailand does not oppose the harmonization of descriptors namely fat, fat with skin, fat/skin and skin. Nonetheless if the committee decides to use different descriptors, clear explanation of the different descriptors should be specified.

7. Honey be included in the Classification system as a miscellaneous commodities

Thailand agrees with the addition honey in Codex Classification of Food and Animal Feed. Since in general honey undergo primary process such as moisture content reduction, Thailand does not have any preference if it to be included in either Class B (primary food commodities of animal origin) or Class E (processed food of animal origin).

Agenda Item 9 Discussion paper on the review of the IESTI equations

General Comments:

- Thailand supports the re-establishment the EWG to continue working on the issues.
- Thailand is of the view that the technical revision of IESTI equations should be considered by JMPR and CCPR should consider other impacts in TOR (i). Moreover, list of blending/bulking in TOR (ii) should be based on scientific data.
- In principle, we agree with using case 3 for homogenous processed commodities or processed products of which their raw materials derived from many farms.

Agenda Item 10 Discussion paper on opportunities and challenges for the JMPR participation in an international review of a new compound

General Comment

- Thailand agrees with establishment of the EWG to develop draft terms of reference and procedures further related to the participation of the JMPR in parallel reviews.

Agenda Item 11 Discussion paper on the development of guidance for compounds of low public health concerns that could be exempted from the establishment of CXLs

General Comment

- Thailand supports the guidance for compounds of low public health concerns that could be exempted from the establishment of CXLs to be approved as new work by CAC42 (2019) and also agree with EWG establishment to prepare this guidance.

Agenda Item 12 Discussion paper management of unsupported compounds

General comment

- In principle, Thailand would like to propose that each option should be determined criteria clearly and agree with option 2a All CXLs will be retained if there is a single registered use listed in the NRD.

Agenda Item 13 National registrations of pesticide

General comments

- In principle, Thailand does not oppose the establish of such database. However, we see insignificant increase of benefits in collecting all commodities that a pesticide is registered for. We are of the view that only column A to C are adequate to provide the benefits of this database in minimum burden from member countries in adding information. This is correspondent to the criteria mentioned in discussion paper on the management of unsupported compounds that all CXLs should be retained if there is even a single registration listed in NRD. At the time for chemicals to be evaluated by JMPR, the specific registration information of such pesticides for certain commodities then can be submitted.
- We would like to confirm the database should than run for 3 years with a new round.