

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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CX 4/40.2

CL 2020/13(REV)-PR

May 2020

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 HARMONIZATION OF MEAT MAMMALIAN MAXIMUM RESIDUE LIMITS BETWEEN THE CODEX COMMITTEE ON PESTICIDE RESIDUES AND THE CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS (CLASSIFICATION OF FOOD AND FEED: CLASS B - PRIMARY COMMODITIES OF ANIMAL ORIGIN)**

DEADLINE: **5 June 2021**

COMMENTS:	<p>To:</p> <p>CCPR Secretariat Institute for Control of the Agrochemicals Ministry of Agriculture (ICAMA) E-mail: ccpr@agri.gov.cn</p>	<p>Copy to:</p> <p>Secretariat Codex Alimentarius Commission Joint FAO/WHO Food Standards Programme E-mail: codex@fao.org</p>
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BACKGROUND

1. When considering a common definition of edible animal tissues for the establishment of maximum residue limits (MRLs) for pesticides and veterinary drugs for compounds with dual uses for application by the Codex Committee on Pesticide Residues (CCPR) and the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF) in Class B – Primary Food Commodities of Animal Origin of the Classification of Food and Feed (CXM 4-1989), CCPR51 (2019) agreed to additionally consider the recommendations of the Joint JECFA/JMPR Working Group on the revision of the Guidance Document for Residue Definition where the Working Group had undertaken a comparison of definitions for the terms “fat”, “meat” and “muscle”.

2. The JECFA/JMPR Working Group noted discrepancies between the definitions in CCPR and CCRVDF. The recommendations put forward by the Working Group for consideration by CCPR were aimed at assisting further work in the Joint FAO/WHO Committee on Food Additives (JECFA) and the Joint FAO/WHO Expert Meeting on Pesticide Residues (JMPR) on the harmonization of residue definitions and establishment of MRLs for compounds with dual uses as pesticides and veterinary drugs.

3. CCPR51 agreed to consider this matter based on the background paper¹ prepared by FAO and WHO on the key findings of the JECFA/JMPR Working Group for consideration by CCPR.

4. In considering the matter that CCRVDF uses the term “muscle” while CCPR uses the term “meat” and whether these two terms can be consolidated, and if so, what would be the appropriate term to use, CCPR51 noted that there was support for alignment of terms between CCPR and CCRVDF and, while there was a preference for the term “muscle”, there was also support for the term “meat”.

5. CCPR51 further noted the following exchange of views on the harmonization of the terms: “fat”, “meat” and “muscle” between CCPR and CCRVDF:

- In considering harmonization and use of terminology, it was important to note how the terms would be used and how they vary in international trade.
- While terminology was important, the definition of terms was more important.

¹ CX/PR 19/51/3-Add.1

- What would be the implication of the outcome of harmonization of terminology – this could impact on the existing MRLs as they were recommended on the basis of residues in fat followed by the term (“fat”). For checking compliance with MRLs, the trimmable fat should be analyzed for residues for comparison with MRLs. For non-fat-soluble pesticides, MRLs for meat were recommended on the basis of the residues in muscle. A change in terminology could have implications in particular for MRLs for fat soluble pesticides.
- Terminology was important for risk assessment and if nomenclature were changed, then such a change would also be required in the FAO manual.

6. CCPR51 could not agree on the use of either terms and agreed to further consider this matter together with a possible harmonized definition for these terms at its next session. The Committee thus agreed to request comments on the JECFA/JMPR proposed definitions for “fat”, “meat” and “muscle” to facilitate discussion on this matter at its next session (see Annex).² The outcomes of the discussion of CCPR52 (April 2020) will be forwarded to CCRVDF25 (May 2020).

7. This matter should be considered within the ongoing work on cooperation between CCPR and CCRVDF on matters of common interest for the establishment of MRLs for pesticides and veterinary drugs for compounds with dual uses. In this regard, the 73rd Session of the Executive Committee (CCEXEC73, 2017) encouraged closer collaboration between the two Committees when considering MRLs for compounds used as both veterinary drugs and pesticides and invited CCPR and CCRVDF to explore innovative ways to foster such collaboration³. Moreover, CCEXEC77 (2019) called upon CCPR and CCRVDF to collaborate and synchronize work on issues of common interest to both committees to the extent possible to facilitate the establishment of MRLs for pesticides / veterinary drugs for compounds with dual uses⁴.

REQUEST FOR COMMENTS

8. In view of the reschedule of CCPR52 to April 2021, member governments and interested international organizations having granted observer status in Codex who have not yet submitted comments or wishing to submit additional comments on the harmonization of meat mammalian MRLs between CCPR and CCRVDF within the framework of the revision of the Classification (Class B: Primary food commodities of animal origin) should do so in writing, in conformity with the Procedures for the Elaboration of Codex Standards and Related Texts (*Codex Alimentarius Procedural Manual*) to the addresses and by the revised deadline indicated on cover page. Comments must be submitted in word file to facilitate their compilation and translation.

9. In providing comments, Member governments and observer organizations are invited to take into account the discussions that took place at CCPR51 as reported in the report of the Session ([REP19/PR](#), paragraphs 157-162 and Appendix VIII) and the information provided in the background document prepared by FAO and WHO on the JECFA/JMPR Working Group on the revision of the Guidance Document for Residue Definition ([CX/PR 19/51/3-Add1](#)).

10. Members and observers are also invited to take note of CL 2021/6-RVDF requesting 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 within the framework of coordination of work between the Codex Committee on Pesticide Residues and the Codex Committee on Residues of Veterinary Drugs in Foods.

11. For ease of reference, these documents can be downloaded from the Codex website as follows:

CCPR51 webpage: <http://www.fao.org/fao-who-codexalimentarius/meetings/detail/it/?meeting=CCPR&session=51>

CCRVDF25 webpage: <http://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCRVDF>

12. For convenience, Appendix VIII of REP19/PR on the harmonization of meat mammalian MRLs between CCPR and CCRVDF (as proposed by the JECFA/JMPR Working Group on the revision of the Guidance Document for Residue Definition) is reproduced in the Annex to this Circular Letter.

13. Codex members and observers are encouraged to submit comments to facilitate discussion on the harmonization of terms for the establishment of harmonized meat mammalian MRLs between CCPR and CCRVDF at the next session of CCPR.

² REP19/PR, paras. 157-162

³ REP17/EXEC2, paras. 17-19

⁴ REP19/EXEC2, paras. 19-20

ANNEX**HARMONIZATION OF MEAT MAMMALIAN MAXIMUM RESIDUE LIMITS
BETWEEN CCPR AND CCRVDF****(As proposed by the JECFA/JMPR Working Group
on the revision of the guidance document for residue definition)****(For comments and consideration at CCPR52)**

Tissue	Definition	Portion of the commodity to which the MRL applies:
CCPR & CCRVDF		
Fat ¹	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.	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 analysed and the MRL applies to the whole commodity (e.g., rabbit meat).
Meat: ¹	The edible part of any mammal.	
Muscle ¹	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 whole commodity without bones.

¹ Glossary of Terms and Definition (Residues of Veterinary Drugs in Foods) (CXM 5-1993)

To address variable interstitial fat contents in muscle, a modification on the annotation "fat" to MRLs is suggested. A suitable wording could be; "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".

For example, if residues of a pesticide with MRLs at 1 mg/kg for muscle and 10 mg/kg for fat are found in a sample of muscle containing 20% fat, the result should be compared with a calculated MRL = [1 × (1-0.2)] + [10 × 0.2] = 2.8 mg/k