

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 7g, 9

CRD23

April 2019

ORIGINAL LANGUAGE

## 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

Comments of INDIA

**REVISION OF THE CLASSIFICATION OF FOOD AND FEED (CXM 4-1989)  
COMMON DEFINITION OF EDIBLE ANIMAL TISSUES FOR THE ESTABLISHMENT OF MAXIMUM  
RESIDUE LIMITS 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**

#### ANNEX

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

**Comments:** Consolidation is possible and single term "Meat" can be used in Codex.

**Rationale:** The term "Muscle" is used in reference to the live animals while the term "Meat" is used after slaughter of animal. Muscle changes to meat after several physio-chemical changes. The residues of veterinary drugs and pesticides have tendency to accumulate in muscles however the final traded as well as consumable form is meat only. Therefore, in case the safety of the product is to be examined in terms of residues of veterinary drugs and pesticides, the most appropriate form/stage would be meat. Further, it is important to note here the definition of meat used in document also include muscles [Para 12 at page 5 of CX/PR 19/51/12]

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

**Comments:** Consolidated edible offal hierarchical classification can be used.

**Rationale:** The document CAC/GL 71-2009 used by CCRVDF utilizes the CCPR Codex Classification for Food and Animal Feeds. Therefore, some level of harmony between two committees on classification already exists.

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

**Comments:** Extrapolation rules can be developed however common rules for CCPR and CCRVDF may not be possible.

**Rationale:** Predilection of residues of Pesticides and Veterinary Drugs vary in terms of animal species as well as particular organ also.

4. **What is the best procedure to establish harmonized descriptors? Examples include different descriptors such as "fat", "fat with skin", "fat/skin" and "skin".**

**Comments:** The best way for establishing harmonized descriptors could be based on metabolism of the compound as well as tissue of species which is used for consumption. Therefore, the descriptors like "Fat/Skin" and "Skin" should be avoided and only two descriptors i.e. Fat and Fat with skin will be sufficient.

**Rationale:** The compounds which are externally applied on animals may have chance of their residue in fat also along with skin. Therefore two descriptors can take care of all combinations based on metabolism of compound and tissue of consumption.

5. **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)?**

**Comments:** As per CCPR Codex Classification for Food and Animal Feed, primary animal commodities are covered in five commodity groups i.e. Mammalian, Poultry, Aquatic, Amphibians and Reptiles, Invertebrate animal. Therefore, Honey bees being the invertebrate animals, the honey should fall under Invertebrate animals commodity group and Class B would be appropriate class. However, it is also important to note that traded honey goes through some level of processing in terms of filtration, moisture reduction etc.

#### **Agenda 9 DISCUSSION PAPER ON THE REVIEW OF THE INTERNATIONAL ESTIMATE OF SHORT-TERM INTAKE EQUATIONS**

**Comments:** India appreciates the work done by the eWG chaired by Netherlands and co-chaired by Brazil and Uganda. India agrees with the recommendations 1, 2, 3 of the eWG and feel that the aspect still need more clarity to understand the challenges before entering into the review process.