

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
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Agenda Item 7(g)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON PESTICIDE RESIDUES

51st Session

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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 (AT STEP 4)

Comments submitted at Step 3 in reply to CL 2019/05-PR
by Australia, Canada, Chile, Ghana and United States of America

Australia

Australia considers in developing common definitions the CCPR/CCRVDf should, where possible, aim to align definitions with those used by regulators and those commonly used in international trade.

Australia notes the CCRVDf definitions for mammalian meat, muscle and fat are listed in the *Glossary of Terms and Definitions (Residues of Veterinary Drugs in Foods)* (CAC MISC 5-1993). There is no definition for edible offal in CAC MISC 5-1993, however CCRVDf 23 agreed on a working definition for edible offal:

“those parts of an animal apart from meat from the carcass, that are considered fit for human consumption”.

Animal Food Commodities

The following comments and suggestions follow a comparison of the CCRVDf and CCPR definitions for animal food commodities (Table 1). The CCPR definitions listed in the table for meat from mammals (Group 030), mammalian and poultry fat (Group 031, Group 37) and milks (Group 33) are those agreed by CAC 24.

Table 1 Comparison of definitions for animal commodities

Commodity	CCRVDf ^A	CCPR ^B
Meat	The edible part of any mammal.	
Muscle – CCRVDf Meat - CCPR	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. <i>Portion of the commodity to which the MRL applies:</i> The whole commodity without bones	Group 030. Meats are the muscular tissues, including adhering fat tissues such as intramuscular, intermuscular and subcutaneous fat from animal carcasses or cuts of these as prepared for wholesale or retail distribution in a “fresh” state. The cuts offered to the consumer may include bones, connective tissues and tendons as well as nerves and lymph nodes. The commodity description of “fresh” meat includes meat which has been quick-frozen or quick-frozen and thawed. The Group does not include edible offal as defined in Group 032 <i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity (without bones). For fat-soluble pesticides a portion of adhering fat is analysed and MRLs apply to the fat. For those commodities where the adhering fat is insufficient to provide a suitable sample, the whole commodity (without bone) is analysed and the MRL applies to the whole commodity (e.g. rabbit meat)

Commodity	CCRVDF ^A	CCPR ^B
		<p>Group 036. Poultry meats are the muscular tissues including adhering fat and skin from poultry carcasses as prepared for wholesale or retail distribution.</p> <p>Exposure to pesticides may result from external treatment of animals or poultry houses or through animal metabolism following oral intake of pesticides with feed.</p> <p>The entire product may be consumed.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity (without bones); For fat-soluble pesticides a portion of adhering fat is analysed and MRLs apply to the poultry fat.</p>
Fat	<p>The lipid-based tissue that is trimmable from an animal carcass or cuts from an animal carcass.</p> <p>It may include subcutaneous, omental or perirenal fat. It does not include interstitial or intramuscular carcass fat or milk fat.</p> <p><i>Portion of the commodity to which the MRL applies:</i> The whole commodity. For fat-soluble compounds the fat is analysed 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).</p>	<p>Group 031. Mammalian fats, excluding milk fats are derived from the fat tissues of animals (not processed).</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity.</p> <p>Group 037. Poultry fats are derived from the fat tissues of poultry. Exposure to pesticides may result from external treatment of animals or poultry houses or through animal metabolism following oral intake of pesticides with feed.</p> <p>The entire product may be consumed.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity.</p>
Edible offal		<p>Group 032. Edible offal are edible tissues and organs other than muscles (=meat) and animal fat from slaughtered animals as prepared for wholesale or retail distribution. Examples: liver, kidney, tongue, heart, stomach, sweetbread (thymus gland), brain, etc. The group name and definitions are in conformity with those recorded in the Codex Standards 89-1981 and 98-1981, Codex Standard for luncheon meat and Codex Standard for cooked cured chopped meat respectively: "Edible offal" means such offal's as have been passed as fit for human consumption, but not including lungs, ears, scalp, snout (including lips and muzzle), mucous membranes, sinews, genital system, udders, intestines and urinary bladder".</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity</p> <p>Group 38. Poultry edible offal's are such edible tissues and organs, other than poultry meat and poultry fat, from slaughtered poultry as have been passed fit for human consumption. Examples: liver, gizzard, heart, skin etc. In the former Classification of Food and Food Groups in the Guide to Codex Maximum Limits for Pesticide Residues 1978: CAC/PR 1-1978 the name Poultry by-products was used for this group.</p> <p>Exposure to pesticides is through animal metabolism following oral intake of pesticides with feed or may result from external treatment of animals or poultry houses.</p> <p>The entire product may be consumed.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole Commodity.</p>

Commodity	CCRVDF ^A	CCPR ^B
Milk	<p>Milk is the normal mammary secretion of milking animals obtained from one or more milkings without either addition to it or extraction from it, intended for consumption as liquid milk or for further processing.</p> <p><i>Portion of the commodity to which the MRL applies:</i> Codex MRLs for fat-soluble compounds in milk are expressed on a whole commodity basis</p>	<p>Group 033. Milk is the normal mammary secretion of milking animals obtained from one or more milkings without either addition to it or extraction from it, intended for consumption as liquid milk or for further processing.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity.</p>
Egg	<p>Egg: The fresh edible portion of the spheroid body produced by female birds, especially domestic fowl.</p> <p><i>Portion of the commodity to which the MRL applies:</i> The edible portion of the egg including the yolk and egg white after removal of the shell</p>	<p>Group 039. Eggs are the fresh edible portion of the body produced by female birds, especially domestic fowl.</p> <p>The edible portion includes egg yolk and egg white after removal of the shell.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole egg whites and yolks combined after removal of shell.</p>
Fish		<p>Group 040-042 Fish are gilled, aquatic vertebrate and/or cartilaginous animals of various zoological families and species, usually wild, as caught and prepared for wholesale and retail distribution. Exposure to pesticides is through animal metabolism or through water pollution. The fleshy parts of the animals and, to a lesser extent, milt and roe are consumed.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity (in general after removing the digestive tract).</p>
Fish roe (including milt = soft roe) and edible offal of fish		<p>Group 043. Fish roes are the edible reproductive bodies of several species of fish. Of some of these only the “hard roe”, the female reproductive body, is used whereas both the “hard” and “soft” roe (milt) of other species is marketed.</p> <p>The term roe used in the commodity description includes if relevant both types of roe.</p> <p>The liver of some species is used as such for human consumption or for production of liver oils (e.g. cod liver oil).</p> <p>Exposure to pesticides is through animal metabolism.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity.</p>
Marine mammals		<p>Group 044. Several sea mammals are caught on a large scale. The meat of various species is used as food or feed in some areas of the world. The blubber (=whale or seal fat) fat and train oil (oil derived from whale fat) is used after processing as raw material in food or feed manufacture; the sperm oil, as well as the spermaceti (a waxy substance from the head of sperm whales) is mainly used in cosmetics and some other industrial products.</p> <p>Exposure to pesticides is by consumption of contaminated prey or through water pollution.</p> <p>The entire commodity except the bones and other inedible parts may be consumed.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity as marketed, without bones. For fat-soluble pesticides a portion of the fat is analysed and MRLs apply to the fat.</p>

Commodity	CCRVDF ^A	CCPR ^B
Crustaceans		<p>Group 045. Crustaceans are aquatic animals of various species, wild or cultivated, which have an inedible chitinous outer shell.</p> <p>A small number of species live in fresh water, but most of species live in brackish water and/or in the sea.</p> <p>Exposure to pesticides is through animal metabolism or water pollution.</p> <p>Crustaceans are prepared for wholesale or retail distribution at a “raw” stage, often still live, “raw” and deep-frozen, or cooked directly after catching and deep-frozen. Shrimps or prawns may also be parboiled and thereafter deep-frozen.</p> <p>Although the cooked or parboiled crustaceans should be regarded as processed foods, the animals of this group are primarily classified in the Chapter on Primary food commodities, type 8: Aquatic animal products, since several crustaceans are also marketed in a “raw” form, i.e. not exposed to temperatures sufficiently high to coagulate the protein at the surface. A short reference to processed Crustaceans is given at type 17: Derived edible products of animal origin, Group 084 Crustaceans, processed.</p> <p>The entire commodity except the shell may be consumed: the “raw” commodities, in general, after cooking.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity (especially with the small sized species) or the meat without the outer shell, as prepared for wholesale and retail distribution.</p>
Frog, lizard, snake and turtle products		<p>Group 048. Frog, lizard, snake and turtle products are the edible parts from various animal species of the zoological classes Amphibia and Reptilia, usually wild, harvested for food. Some frog species are cultivated in a few European and Asian countries and to a small extent in the USA and marked in the form of deep-frozen frog legs. The wild species are marketed in the same manner.</p> <p>A few turtle species are raised from eggs or hatchlings in some tropical countries, especially the Green Turtle.</p> <p>Exposure to pesticides is through animal metabolism.</p> <p>The entire product, except the bones and the bony or horny outer shell (turtles), may be consumed.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity as marketed without bones or the outer shell.</p>
Molluscs		<p>Group 049. Molluscs are aquatic or land animals of various species, wild or cultivated, which have an inedible outer or inner shell.</p> <p>The edible aquatic Molluscs live mainly in brackish water or in the sea; several species are cultivated. A few edible species of land snails are cultivated.</p> <p>Exposure to pesticides is through animal metabolism: the aquatic species also through water contamination.</p> <p>The entire commodity except the outer or inner shell may be consumed.</p> <p><i>Portion of the commodity to which the MRL applies (and which is analysed):</i> Whole commodity after removal of shell.</p>

^A Glossary of Terms and Definitions (Residues of Veterinary Drugs in Foods) (CAC MISC 5-1993)

^B Codex Classification of Foods and Animal Feed (CAC MISC 4-1989) including amendments agreed at CAC 24.

CCRVDF does not establish MRLs for veterinary drugs in mammalian meat. MRLs are established for muscle, fat, milk and specific edible offal such as liver and kidney.

The CCRVDF definition for muscle and the CCPR definition for meat are similar and compatible.

The CCRVDF and CCPR definitions for fat and milk are compatible

The definition proposed by the CCRVDF for edible offal is not compatible with the definition for meat in CAC MISC 5-1993 as “the edible part of any mammal” clearly includes offal.

The term ‘meat’ in many countries is defined in terms of all edible tissues and would include offal. For example, in the Australian *Export Control (Meat and Meat Products) Orders 2005*, meat is defined as “any part of a slaughtered animal” and includes offal.

Any definition for edible offal should take account of descriptions used in international trade. Some parts of the carcass, for example the diaphragm, are defined in international trade as offal. HS code 206: Edible offal includes HS 0206109500 Thick skirt and thin skirt (note skirt = diaphragm muscle = skirt steak).

Diaphragm muscle may be included or removed from the carcass depending on commercial requirements (UNECE Standard for Beef meat, Carcasses and Cuts. 2015 edition. https://www.unece.org/fileadmin/DAM/trade/agr/standard/meat/e/Bovine_326Rev2E_2016.pdf)

The EU Combined Nomenclature defines ‘carcasses or half-carcasses’, for the purposes of subheadings 0203 11 10 and 0203 21 10: slaughtered pigs, in the form of carcasses of domestic swine which have been bled and eviscerated and from which the bristles and hooves have been removed. Half-carcasses are derived from whole carcasses by division through each cervical, dorsal, lumbar and sacral vertebra, through or along the sternum and through the ischio-pubic symphysis. These carcasses or half-carcasses may be with or without head, with or without the chaps, feet, flare fat, kidneys, tail or diaphragm. Half-carcasses may be with or without spinal cord, brain or tongue. Carcasses and half-carcasses of sows may be with or without udders (mammary glands).

The UNECE standard for Porcine Meat, Carcasses and Cuts (2018 edition https://www.unece.org/fileadmin/DAM/trade/agr/standard/standard/meat/e/Porcine_Rev3_2018E.pdf) defines a carcass as:

Full carcass includes all parts of the body skeletal musculature and bone, shall be dressed without the kidneys or other internal organs and shall be practically free of internal fat. The kidney, pelvic, heart and leaf fat may remain. There shall not be any objectionable scores on the outside of the carcass and, unless otherwise specified, the carcass shall be skin-on. Mutilated feet must be removed at the hock or upper knee joint (as applicable). Carcasses with bloody “stuck” shoulders (caused by improper severing of the carotid artery) are not acceptable. The membranous portion of the diaphragm must be removed close to the lean, although the lean portion (and the membrane surrounding the lean portion) may remain if firmly attached to the carcass. Head, jowls and feet are retained unless otherwise specified. The tail is retained unless otherwise specified. To be specified:

- Head removed
- Head and jowls removed
- Head removed and jowls retained
- Fore foot (trotter) removed
- Hind foot (trotter) removed
- Tail removed
- Diaphragm removed
- Pillar of diaphragm removed
- Flank fat adjacent to the leg removed
- Kidney, pelvic, heart, leaf fat removed

In other words, carcass may include the head.

As edible offal in international trade includes commodities not currently included in CAC MISC 4-1989, Australia suggests as a starting point the following definition for edible offal:

‘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’.

UNECE Standard for Edible Meat Co-Products (2015 edition, https://www.unece.org/fileadmin/DAM/trade/agr/standard/meat/e/Ediblemeat_coproducts_2015_e.pdf) contains an extensive list of offal products for the various species in trade that could be used as a basis for a Codex classification.

In appendix 1 of CX/PR 19/51/12 there is reference to commodity standards that have definitions for edible offal. Australia considers these are not relevant. The range of traded edible offal that should be covered by pesticide MRLs is large. Commodity standards may specify a subset of edible offal allowed to be included in particular products such as luncheon meat or salami etc. Australia considers there is no need for alignment with these commodity standards as they are for different purposes.

Suggestions

1. Recommend CCRVDF consider deleting or revising the definition for meat in CAC MISC 5-1993
2. CCPR change entries for 'meat' to corresponding entries for 'muscle' in Codex Classification and fully align current CCRVDF definition for muscle with the definition of the newly named muscle in the Classification (e.g. change meat (from mammals other than marine mammals) to mammalian muscle (from mammals other than marine mammals) and meat of cattle, pigs and sheep to muscle of cattle, pigs and sheep etc.).
3. Introduce a more specific harmonised Codex definition for 'edible offal' to better reflect the definitions currently applied for international trade. For example:
'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'.
4. The UNECE Standard for Edible Meat C-Products (2015 edition, https://www.unece.org/fileadmin/DAM/trade/agr/standard/meat/e/Ediblemeat_coproducts_2015_e.pdf) could be used as a starting point for a list of edible offal.
5. Other Animal Food Commodities. Since there are no JECFA/CCRVDF definitions currently in place for other animal tissues, the definitions in the Codex Classification should be used as the starting point for establishing agreed harmonised definitions.

Responses to Questions raised in CL2019/05-PR

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

Yes. For reasons stated above, use of the term 'muscle' is favoured by Australia.

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

No. As explained above, Australia considers that a more specific definition is preferable. For example:

"Offal: means 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."

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

Yes, it is the basis for the CCPR classification system.

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

Different circumstances exist in CCPR and CCRVDF; direct treatment (CCRVDF) versus incidental exposure (CCPR). It may be better to leave extrapolation rules to each committee (CCRVDF/CCPR) and their supporting scientific expert committees (JECFA/JMPR).

In general, Australia supports the use of extrapolation from liver/kidney to all other offal noting the impracticality of requiring residue data for a wide range of additional offal tissues and, from the assessment of consumer dietary risk, the degree of conservatism in taking this approach.

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

This issue relates to pigs and poultry.

In considering harmonised descriptors it is useful to first consider the need for the different descriptors used. JMPR generally does not recommend MRLs for skin. JMPR rarely reviews residue trial data for pigs but often reviews data for chickens.

JECFA recommends MRLs for both fat and skin+fat however, JECFA is not consistent in their approach. An analysis of the list of Codex MRLs for veterinary drugs (CX/MRL 2-2018) indicates 6/26 (23%) instances of skin+fat for pigs with 20/26 (77%) set for fat only. Similarly for chicken, there were 9/19 (47%) instances of skin+fat MRLs with 10/19 (53%) of MRLs for fat only.

There was no relationship with chemical properties such as fat solubility and the setting of MRLs for skin+fat.

It is possible the data in the residue trials evaluated by JECFA are reported for skin+fat and the MRL recommendations just reflect the sample analysed in the residue trials (Table 2).

Table 2. JECFA recommendations for fat and skin+fat and available tissue residue data

Compound	Species	Residue data available to JECFA	MRL recommendation
Amoxicillin	pigs	skin/fat	Skin/fat
Avilamycin	pigs	skin/fat	Skin/fat
	Chickens	skin/fat	Skin/fat
Carazolol	pigs	fat, skin	Skin/fat
Colistin	pigs	skin/fat	Skin/fat
	Chicken	skin/fat	Skin/fat
Erythromycin	chicken	skin/fat	Skin/fat
Lasalocid	chicken	skin/fat	Skin/fat
Lincomycin	pigs	skin/fat	Skin/fat
	Chicken	skin/fat	Skin/fat
Nicarbazin	chicken	fat, skin/fat	Skin/fat
Ractopamine	Pigs	fat, skin	Fat ^A
Tilmicosin	chicken	skin/fat	Skin/fat
	Pigs	fat, skin	Fat
Tylosin	chicken	skin/fat	Skin/fat
	Pigs	skin/fat	Skin/fat
Flumequin	Chicken	fat, skin/fat	Fat
Monensin	Chicken	fat	Fat

^A NOTE: recommendation in JECFA report (41/16+addendum) and proposed by CCRVDF 17 is for fat only. The note in CX/MRL 2-2018 for skin+fat should be deleted.

If this is the case, it may be that guidelines for residue data generation could be amended to ensure data are available in the future for fat and skin separately.

Regulation of MRLs established for skin+fat could be problematical for compounds with different solubilities in skin and fat, in which case the residue concentration would depend on the proportions of skin and fat in the sample analysed.

Australia considers the definition of fat suffices and that it is not necessary to include skin.

Clarification should be sought regarding the reasons JECFA and CCRVDF has for setting skin+fat MRLs.

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)?*

Australia has no issue with including honey in the classification system as a miscellaneous commodity.

Honey could appear in both Class B and in Class E.

Honeycomb could be Class B

Other honey is extracted from honeycomb and generally sold as a blended and pasteurised commodity and could be Class E.

Canada

BACKGROUND

1. CCRVDF agreed to establish an EWG, hosted by Kenya, to prepare a discussion paper in response to the request from 81st JECFA for CCRVDF to "provide a definition of edible offal". The discussion paper would propose a possible definition of edible offal tissue and specify edible offal tissues of interest in international trade. The discussion paper would be considered at the 24th CCRVDF meeting.

2. The discussion paper produced by the EWG was tabled at the 24th CCRVDF meeting. After a lengthy discussion the committee adopted a working definition of edible offals as “*those parts of an animal, apart from meat from the carcass, that are considered fit for human consumption*”. It was however recognized that any definition adopted by the CCRVDF should be harmonized with any definition used by CCPR. It was noted that CCPR are currently revising its Codex Classification for Food and Animal Feed and it would be opportune to co-ordinate with CCPR.
3. At the 24th session of the Codex Committee on Residues of Veterinary Drugs (CCRVDF) in Chicago, USA (23-27 April 2018), the Committee agreed to establish an electronic working group. The purpose of the group was to coordinate with the EWG of CCPR (Classification of Food and Feed) to elaborate a definition for edible offal and for any other animal tissues of relevance, for the purpose of harmonization and the elaboration of MRLs.

ACTIVITIES OF THE EWG (CLASSIFICATION OF FOOD AND FEED)

- A discussion paper on edible offals, developed by the co-chairs of the CCRVDF EWG of edible offal was circulated to the EWG. The EWG was asked to provide comments on a harmonized definition of edible offal for initial discussion.
- Discussion and comments included support for consolidation of the definition of edible offal by Thailand, Iran, Germany, Japan, Canada and Chile. Germany supported the use of a hierarchical system along with extrapolation rules, the consolidation of the terms muscle and meat and the addition of honey to the CCPR classification system.
- The comments from the EWG were consolidated into a single document and provided to the CCRVDF EWG on October 30, 2018 and subsequently posted on their forum site.
- There was no further participation requested of the EWG working group members and no revised documents posted for consideration/discussion by the EWG.
- The same discussion paper on edible offals that was provided to the EWG is attached in Appendix I of CX/PR 19/51/12

CURRENT SITUATION:

- As summarized in CX/PR 19/51/12, based on the discussion paper in Appendix I and discussions within the respective EWGs, opportunities for consolidation between CCPR and CCRVDF include:
 - A consolidated edible offal definition for both CCPR and CCRVDF.
 - A consolidated edible offal hierarchical classification of edible offal for both CCPR and CCRVDF.
 - Consideration of animal extrapolation rules using representative animal edible offal tissues.
 - Consideration of target edible offal tissue for risk assessment.
- CCPR is invited to consider the following questions based on the considerations provided in the working document and comments submitted in reply to CL 2019/05-PR in order to provide guidance to further progress work on a common definition for edible animal tissues (including edible offal tissues):
 1. CCRVDF uses the term muscle, while CCPR uses meat. Can these terms be consolidated? If so, what is the appropriate term to use?
 2. Is the proposed consolidated edible offal definition acceptable: “Those parts of an animal, apart from meat from the carcass, that are considered fit for human consumption”.
 3. Should a consolidated edible offal hierarchical classification be used for CCPR and CCRVDF and how can this be accomplished?
 4. Can animal extrapolation rules be developed for both CCPR and CCRVDF using representative animal edible offal tissues.
 5. What is the best procedure to establish harmonized descriptors? Examples include different descriptors such as “fat”, “fat with skin”, “fat/skin” and “skin”.
 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)?

Canada's Position

- As a member of the Electronic Working Group on the Revision of the Classification, Canada provided comments through this working group on the discussion paper and the definition of edible animal tissue. Most EWG members commented on whether they supported a common definition of edible animal tissue between the CCRVDF and CCPR. There was no on-going discussion within the EWG CCPR with respect to the questions CCPR is currently being requested to comment on.
- Canada would like to defer commenting on the questions included under the Recommendation section of CX/PR 19/51/12 (summarized above) as additional time is required in order to develop a Canadian position.
- Alternatively, Canada recommends that a CCRVDF/CCPR EWG be established to jointly work on a common definition for edible animal tissues (including edible offal tissues). The EWG should also address the questions CCPR is being requested to comment on as part of the work toward a common definition.

Chile

Chile's response to the questions based on the considerations provided in the working document in order to provide guidance to further progress work of CX/PR 19/51/12 on a common definition for edible animal tissues (including edible offal tissues):

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

It is better to use the word "meat" because meat comprises more than muscle, whatever the largest part or the part of interest is, as defined by the CCPR.

"Meat means the muscular tissues, including adhering fatty tissues such as intramuscular, intermuscular and subcutaneous fat from animal carcasses or cuts of these as prepared for wholesale or retail distribution in a "fresh" state. The cuts offered to the consumer may include bones, connective tissues and tendons as well as nerves and lymph nodes."

In addition, it is understood that the muscle must go through a series of physio-chemical processes to become meat and be fit for consumption.

It also seems important to clarify the species which comprise the name in the definition of the Codex, if it is to include all terrestrial and aquatic species or for example "**meat from mammals (other than marine mammals)**", "**poultry meat**" and "**fish meat**" in order to clarify the scope of this definition, because the term "meat" is also used to refer to those in the CCPR (Classification).

Finally, the term "fresh" should be replaced by "raw" because frozen meat is also marketed.

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

The definition seems appropriate.

It would also be appropriate to refine the scope of the definition considering that the CCPR also uses the term for poultry.

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

Yes, as it would facilitate the possibility of extrapolating MRLs for both committees. The CCPR classification can be used as a basis.

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

Yes, it seems appropriate. However, clear extrapolation rules should be developed, because given the metabolism of some components, it is possible that both single tissues and tissues that can be extrapolated exist. Therefore, whether there are "representative" tissues depends on the chemical compound.

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

Chile has no comments to this 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)?

We support including honey and consider that it should be listed under category B, **primary food commodities of animal origin.**

Ghana

Position: Ghana welcomes the work of the Electronic Working group chaired by Kenya and co-chaired by New Zealand which was established by the Codex Committee on Residues of Veterinary Drug in Foods.

We support the principle of harmonization of edible offal tissue to avoid confusion for enforcement especially when establishing MRLs for dual-purpose compounds.

Rationale: This will be important to avoid confusion that could lead to trade disruption and have impact on public health when establishing MRLs for dual-purpose compounds.

United States of America

GENERAL COMMENTS

The United States supports continued cooperation between CCRVDF and CCPR to harmonize the definition of edible offal and to consider other cooperative approaches to common issues.

SPECIFIC COMMENTS

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

The definitions currently used for “muscle” by CCRVDF and for “meat” by CCPR are nearly equivalent; they refer to muscular tissues, including interstitial and intramuscular fat, and may include, in natural portions, connective tissues, nerves, and lymph nodes. The term “meat” used by CCRVDF and by many regulators/enforcement agencies has a broader definition, for example “the edible part of any mammal” (CCRVDF).

Given that the intention of the FAO/WHO Joint Expert Meeting on Pesticide Residues (JMPR) and the CCPR with using the term “meat” is to indicate “muscle,” as defined by other authorities, the United States supports revising the CCPR definition to align with that of CCRVDF. Further, the United States notes that the current practice by the CCPR of not listing Maximum Residues Limits (MRLs) for meat for fat-soluble compounds should be revised such that separate MRLs are established for residues in mammalian muscle and in fats, regardless of the classification of fat solubility.

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

The United States generally agrees with the proposed consolidated definition of edible offal, however we would like to propose a modification to the text consistent with our comments in response to Question 1—changing “meat” to “muscle.” Given the broader implications of “meat” in some systems, it could be interpreted as including organs, which does not appear to be the intent of the definition.

“Those parts of an animal, apart from ~~meat~~ **muscle** from the carcass, that are considered fit for human consumption.”

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

It is our understanding from the Chair of the Classification electronic Working Group (EWG) that Class B (primary food commodities of animal origin) may be taken up in the next round of work proposed for the EWG on Classification, to be decided at the upcoming session of CCPR. In addition, we understand that there are two EWGs in CCRVDF tasked with the following:

- Definition of animal tissues to facilitate the establishment of maximum residue limits (MRLs) for compounds with dual uses (i.e., pesticides and veterinary drugs)
- Extrapolation of maximum residue limits for veterinary drugs to one or more species (including a pilot on extrapolation of MRLs to some species)

As such, the United States believes that it is still too early to determine if a consolidated hierarchical classification for edible offal should be used for CCPR and CCRVDF. We propose to wait until CCPR52 to see if any potential EWGs established in CCPR, as well as the two CCRVDF EWGs cited above, have had time to address the question more fully.

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

This question is linked to Question 3. The United States believes that it is premature to determine whether animal extrapolation rules using representative animal edible offal tissues may be developed for both CCPR and CCRVDF.

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

The United States believes that the FAO/WHO Joint Expert Committee on Food Additives (JECFA) and JMPR should be consulted on harmonized descriptors.

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)?*

The United States believes that honey could be included in the *Classification* system as a miscellaneous commodity. We believe that it is more appropriate to include honey in Class B (primary food commodities of animal origin) since we consider Class E commodities to be subject to post-harvest processing by human intervention.