

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations

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World Health
Organization

Agenda Item 8

CX/RVDF 21/25/9-Add.1

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

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DEFINITION OF EDIBLE OFFAL AND OTHER ANIMAL TISSUES OF RELEVANCE FOR THE PURPOSE OF ELABORATION AND HARMONIZATION OF MAXIMUM RESIDUE LIMITS

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

in reply to CL 2021/6-RVDF:

Australia, Chile, Ecuador, Egypt, Iran and Peru

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2021/6-RVDF issued in January 2021.
2. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific paragraphs.
3. The comments submitted through the OCS are, hereby attached as Annex I and are presented in table format.

GENERAL COMMENTS

Comment/Rationale	Member/Observer
<p>Referring to the CL 2021/6/OCS-RVD related to the request for comments on the following 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.</p> <p><u>Definition for edible offal for adoption:</u></p> <p>Those parts of an animal, apart from the skeletal muscle and fat, that are considered fit for human consumption.</p> <ul style="list-style-type: none"> - 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). - CCRVDF to recommend CCPR to adopt the same definition for consistency and facilitation of MRLs for dual compounds. <p><u>Classification of Food and Feed (CXA 4-1989)</u></p> <p>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.</p> <p><u>Extrapolation of MRLs for edible offal</u></p> <p>The CCRVDF EWG on extrapolation should continue its work and develop rules applicable to residues of veterinary drugs.</p> <ul style="list-style-type: none"> - CCRVDF to develop and apply a suitable approach for the extrapolation of residues of veterinary drugs in edible offal when appropriate. - CCPR and CCRVDF to consider setting MRLs for edible offal based on extrapolation rules rather than setting MRLs for individual edible offal tissues. <p><u>Other Matters:</u></p> <p><u>Food descriptors – Coordination between JECFA/JMPR</u></p> <ul style="list-style-type: none"> - 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. <p>In this regard, Egypt agrees with "the above definition for edible offal and the above recommendations" taking into account the following points:</p> <ol style="list-style-type: none"> 1- It is necessary to apply the rules of extrapolation of residues of veterinary drugs in edible offal. 2- Applying extrapolation to setting MRLs for edible offal is a temporary process with the necessity to recommend JECFA to put MRLs for edible offal tissues. 	Egypt
<p><u>General comments:</u></p> <p>Iran appreciates the efforts of the Kenya and New Zealand as chair and co-chair on the WG of Definition of animal tissue to facilitate the establishment of MRLs for compound with dual uses (pesticides and veterinary drugs) and thanks for the opportunity to comment on the draft of the CL 2021/6/OCS-RVDF. We would like to submit the following comments:</p> <p>The definition of edible offal as whatever is recommended by CCPR but for classification as edible offal all over the world has a large variety of tissue and texture so their situation against residues are significantly different. Since it cannot be classified in one group thus, it is recommended to classify them according to the residue survey in some group.</p>	Iran

Comment/Rationale	Member/Observer
<p>Al respecto, manifestamos que luego de haber revisado el párrafo 22 y 23 del documento CX/RVDF 20/25/9, Perú está de acuerdo con las Recomendaciones relativas a los despojos comestibles y otros tejidos de origen animal pertinentes a efectos de la armonización y elaboración de límites máximos de residuos para los compuestos de uso dual.</p> <p>Cabe resaltar, que de existir información científica que sustente la extrapolación de los LMR en los despojos comestibles, se podría considerar su aplicación en lugar de establecer LMR para cada despojo comestible. Asimismo, estamos de acuerdo con la propuesta de solicitar asesoramiento al JECFA en coordinación con el JMPR, sobre el uso más adecuado de términos como “grasa”, “grasa con piel”, “grasa/piel” y “piel”.</p> <p>Sin otro particular, hago propicia la oportunidad para expresarle los sentimientos de mi especial consideración y estima.</p>	Peru

SPECIFIC COMMENTS

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.

<p>Definition</p> <p>Regarding the proposed definition for edible offal Australia is concerned how muscle with skin attached would be classified, e.g. pork muscle/fat with skin on, poultry muscle with skin, fish muscle with skin.</p> <p>Under the current proposal it appears edible skin could be classified as offal.</p> <p>However, CCRVDF has MRLs for “pig fat with skin”, “pig fat/skin”, “chicken fat/skin”, turkey fat/skin, rabbit fat/skin, in the some cases pig fat, chicken fat and turkey fat the notes state the MRL includes skin + fat, in other cases such as chicken fat the note may state fat/skin in normal proportion, similarly for in the case of finfish fillets the note states muscle plus skin in natural proportions.</p> <p>Perhaps the proposed definition could be reworded:</p> <p>Definition for edible offal for adoption:</p> <p><i>Those parts of an animal, apart from the skeletal muscle, fat and attached skin, that are considered fit for human consumption.</i></p> <p>By adding “and attached skin”, those meats that are potentially consumed with skin on are covered by the definition (i.e. pork, poultry, fish).</p>	Australia
<p>Definición: Conforme a la propuesta planteada por la presidencia del GTe sobre la definición de despojos comestibles, Ecuador apoya la propuesta, considerando que la definición se acoge plenamente a la normativa nacional en donde se define como “menudencias” (despojos) comestibles, todas las menudencias autorizadas por la legislación vigente y certificadas por el control veterinario como aptos para el consumo humano.</p> <ol style="list-style-type: none"> 1. Se apoya que el CCRVDF adopte la definición de despojo comestible y la incorpore al glosario de términos y definiciones (para residuos de medicamentos veterinarios en los alimentos). 	Ecuador
<p>Definición: Se apoya la definición, en consideración a que se acota a aquellos subproductos que son aptos para consumo humano.</p> <p>La definición se debiera leer en complemento o con referencia a la definición de músculo “Glosario de términos y definiciones (para residuos de medicamentos veterinarios en los alimentos) (CXM 5-1993)”, ya que describe los diferentes tejidos que pueden estar presente en el músculo esquelético.</p> <ol style="list-style-type: none"> 2. Se apoya la propuesta. En caso de producirse cambios sustanciales, debiera seguir el mismo formato de trabajo realizado hasta la fecha, es decir, que la propuesta del CCPR, se devuelva al CCRVDF para revisión y/o aprobación. 	Chile

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.

Se apoya la propuesta. Se solicita aclarar si el CCRVDF será donde se inicie la propuesta y posteriormente se enviará a CCPR para comentarios, se entiende que este debería ser el procedimiento, con la finalidad de continuar con el mismo orden que se ha trabajado la definición de despojos comestibles.	Chile
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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.

4. Se apoya la propuesta. Es importante seguir el trabajo para contar con nuevos LMRs, que faciliten el comercio de alimentos inocuos 5. Se apoya la propuesta. Se entiende que este enfoque será desarrollado en el marco de las actividades que realizó el Grupo de trabajo por medios electrónicos. 6. Se apoya el que ambos Comités estudien la posibilidad de establecer LMR para los despojos comestibles a partir de las normas de extrapolación. No obstante lo anterior, un punto de preocupación a tener en consideración, debiera ser que esto sea analizado caso a caso y en relación a su uso previsto, por ejemplo, formato de presentación. Adicionalmente, Chile no está de acuerdo con la segunda parte de la frase “en lugar de establecer LMR para los distintos tejidos de despojos comestibles.”, ya que no se debe limitar la posibilidad de realizar estudios y propuestas de LMR para los despojos comestibles, si estos fuesen propuestos para incorporara en la lista de prioridades del CCRVDF.	Chile
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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

Considerando el acuerdo sobre la recomendación de la 51. ^a reunión del CCPR de que se solicitase asesoramiento al JECFA/JMPR sobre los descriptores adecuados, creemos pertinente que debido a la existencia de circunstancias diferentes para medicamentos veterinarios cuyo uso o aplicación es básicamente tratamiento directo, a diferencia de los plaguicidas que pueda darse por una exposición incidental, sería factible pedir orientación para este tipo de extrapolación, a los órganos de evaluación de riesgos (JECFA y la JMPR) tomando en cuenta la diferencia entre medicamentos veterinarios y plaguicidas, así como sus usos. Para finalizar, respecto a las demás propuestas de la circular, Ecuador apoya la propuesta planteada.	Ecuador
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