



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

53rd Session

(Virtual)

4-8 July and 13 July 2022

#### REVISION OF THE CLASSIFICATION OF FOOD AND FEED

#### COORDINATION OF WORK BETWEEN CCPR and CCRVDF:

#### Class B – Primary food commodities of animal origin

#### Harmonization of meat mammalian maximum residue limits between CCPR and CCRVDF:

#### Harmonized definition for edible offal and other edible animal tissues

(Prepared by the CCPR/EWG on the Revision of the Classification  
chaired by the United States of America and co-chaired by the Netherlands  
in collaboration with the CCRVDF/EWG on edible offal chaired by Kenya and co-chaired by New Zealand )

Codex members and observers wishing to submit comments at Step 3 on this document  
should do so as instructed in CL 2022/36-PR available on the Codex webpage<sup>1</sup>  
This document should be read in conjunction with working documents under Agenda Items 7(b) and 7(c).

#### BACKGROUND

1. The current definition of edible offal was developed based on cooperation between CCPR Electronic Working Group (EWG) on the revision of the Classification of Food and Feed and the CCRVDF/EWG on Edible Offal for the purpose of harmonization and to facilitate the establishment of single MRLs for compounds with dual uses.
2. The 25<sup>th</sup> Session of the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF25, 2021) discussed a proposed definition for edible offal based on proposal made by CCPR51 (2019)<sup>2</sup> and considered how skin would be treated as there were situation where skin is consumed separately from the muscle, which would be considered as edible offal, and situations where skin was consumed attached to muscle/fat. CCRVDF25 noted that the definition was kept as broad as possible to remain flexible to cover all possible edible offals that are significantly consumed and traded internationally.
3. CCRVDF25 agreed to (i) forward the definition of edible offal as amended by the Committee for adoption by the Codex Alimentarius Commission (CAC) and inclusion in the *Glossary of Terms and Definitions* and (ii) recommend CCPR to adopt the same definition for consistency and facilitation of establishment of MRLs for compounds with dual purposes. The definition agreed to by CCRVDF was: “*Edible offal: Those parts of an animal, apart from the skeletal muscle, fat and attached skin, that are considered fit for human consumption*”.<sup>3</sup> This definition was adopted by the 44<sup>th</sup> Session of the Codex Alimentarius Commission (CAC44, 2021)<sup>4</sup>.
4. CCPR52 could not considered this proposal in detail and agreed to re-establish the EWG on the revision of the Classification, chaired by USA and co-chaired by The Netherlands, to continue work on the revision of the Classification as well as matters related to edible animal tissues (including edible offal) in collaboration with the CCRVDF/EWG on Edible Offal.<sup>5</sup>

<sup>1</sup> Codex webpage/Circular Letters:

<http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>.

Codex webpage/CCCF/Circular Letters:

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

<sup>2</sup> REP19/PR51, paras. 163-165

<sup>3</sup> REP21/RVDF25, paras. 106-116, Appendix IV

<sup>4</sup> REP21/CAC44, Appendix III

<sup>5</sup> REP21/PR52, paras. 180-185

5. The EWG continued to work on edible animal tissues, including edible offal, in collaboration with the CCRVDF/EWG on edible offal based on the recommended definition provided by CCRVDF25:

*“Edible offal: “Those parts of an animal, apart from the skeletal muscle, fat and attached skin that are considered fit for human consumption”.*

The following comments were provided:

- 5.1 Australia supported the definition and noted its similarity to the definition in Class B, Group 032. Chile supported the same definition for edible offal as agreed to by CCRVDF. Canada also supported the definition proposed by CCRVDF.
- 5.2 Thailand had concerns regarding the term “skeletal muscle” as some edible offal consists of skeletal muscle, while there is also non skeletal such as heart muscle. Thailand also noted that appendages containing skeletal muscle such as trotters and hooves should be clearly defined whether they are meat or edible offal.
- 5.3 Germany noted clarification was needed for the terminology of “skin” and the need for corresponding consumption data. In a subsequent post, Germany provided a modified definition of meat and edible offal (see Appendix II for definitions and rationale).

#### **DISCUSSION**

6. While a number of countries agreed with the CCRVDF definition, possible issues were noted regarding the definition of “skeletal muscle” (Thailand) and “skin” (Germany).
7. An alternative definition to resolve these discrepancies was proposed by Germany (Appendix II).

#### **CONCLUSIONS**

8. The CCPR/EWG on the Revision of the Classification requests further consideration of the definition of “edible offal” as agreed by CCRVDF25 vis-à-vis a proposal for a revised definition made by Germany.
9. The CCPR/EWG could not reach agreement on either proposals and therefore requests comments from Codex members on these proposals for consideration by CCPR53.
10. Other issues raised in CL 2020/13-PR<sup>1</sup> related to 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, i.e. harmonized definition/descriptors for “meat”, muscle” and “fat”, were not discussed in the EWG. CCPR may still consider this issue in light of the discussion that took place at CCPR51<sup>6</sup> and CCPR52<sup>7</sup> with a view to harmonize terminology and/or definition on these food descriptors between CCPR and CCRVDF for the purposes of the establishment of single/harmonized MRLs for the same tissue/food for compounds with dual uses.

#### **RECOMMENDATIONS**

11. CCPR is invited to consider the definition for “edible offal” as agreed by CCRVDF25 and adopted by CAC44 and a proposed revised definition made by Germany in consideration of issues with “meat” and “skin” as presented in Appendix I.
12. In considering the definition of edible offal, CCPR is also invited to consider the definition for “meats” as provided by Germany in Appendix II and the definition for “meat”, “muscle” and “fat” as proposed by the JECFA/JMPR Working Group as presented in Appendix III.
13. CCPR will consider the proposed definitions together with comments submitted in reply to CL 2022/36-PR.

<sup>6</sup> REP19/PR51, paras. 157-162, Appendix VIII

<sup>7</sup> REP21/PR52, paras. 180-185

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**APPENDIX I****(For comments)****1. Definition for Edible Offal as agreed by CCRVDF25 and recommended for adoption by CCPR53:**

Edible offal: Those parts of an animal, apart from the skeletal muscle, fat and attached skin, that are considered fit for human consumption.

**2. Definition for Edible Offal as proposed by Germany based on information and considerations provided in Appendix II for consideration by CCPR53:**

Edible offal: Those parts of an animal, apart from the skeletal muscle and adhering fat tissues, that are considered fit for human consumption.

**APPENDIX II****(For comments)****Definition for “meats” as proposed by Germany:**

“Meats are 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” or frozen state.”

**For information****(Prepared by Germany)****Edible Animal Tissues**The proposed definition for edible offal

The following proposal is open for discussion:

“Edible offal: Those parts of an animal, apart from the skeletal muscle, fat and attached skin, that are considered fit for human consumption.”

This definition is in line with the current definition for poultry meat. I know that a similar definition for pigs might be suitable, but for the moment not included in the residue definition for mammalian products. For fish the residue definition for meat includes the whole fish without the digestive part, meaning also edible offals, here roe, milt and liver and skin are included.

Problem

The problem here is not that the definitions differ in when edible offals are included or not in the definition of meat but double regulation of certain product appear, e. g. poultry meat with skin and skin, whole fish and edible offals of fish.

When looking to OECD TG 505 Residues in livestock a further problem occurs. The OECD TG 505 requires sampling of meat and in addition of skin with fat from livestock studies for poultry and of meat and in addition of skin for pigs. The analysis of skin is necessary in case of dermal uses. This means, for mammals except marine mammals and poultry, meat with adhering skin is not part of the sampling procedure. Thus the MRL for poultry with adhering skin is based on data on meat.

Possible solution

Taking the above points into account as well as changing dining habits I propose to bring the different definitions and Guidelines in line. The easiest way will be to define **meat for all animals** as

“Meats are 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” or frozen state.”

and for edible offal as

“Those parts of an animal, apart from the skeletal muscle and adhering fat tissues, that are considered fit for human consumption.”

The two definitions are in line with each other (not mentioning certain products twice), we are in line with OECD TG 509, we do not include double regulations, and we more in line with today’s dining habits.

**APPENDIX III**

(For comments)

**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)**

Tissue	Definition	Portion of the commodity to which the MRL applies:
<b>CCPR &amp; CCRVDF</b>		
Fat <sup>1</sup>	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: <sup>1</sup>	The edible part of any mammal.	
Muscle <sup>1</sup>	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.

<sup>1</sup> 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 =  $[1 \times (1-0.2)] + [10 \times 0.2] = 2.8$  mg/kg.

**APPENDIX IV**

**LIST OF PARTICIPANTS**

**(The List applies to all working documents  
for Agenda Item 7  
See Agenda Item 7(a))**