

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8

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

June 2021

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

25th Session
(Virtual)
12-16 and 20 July 2021

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. 	<p>Egypt</p>
<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>	<p>Iran</p>

Comment/Rationale	Member/Observer
<p>In this regard, after reviewing paragraphs 22 and 23 of document CX/RVDF 20/25/9, Peru expresses its agreement with the recommendations pertaining to edible offal and other relevant animal tissues with a view to harmonizing and developing maximum residue limits for dual use compounds.</p> <p>It is worth noting that if scientific information existed supporting the extrapolation of MRLs in edible offal, it would be possible to consider applying that rather than establishing MRL for each edible offal. In addition, we agree with the proposal to seek the advice of JECFA in coordination with JMPR on the appropriate use of terms such as “fat,” “fat with skin,” “fat/skin,” and “skin.”</p> <p>With nothing further to add, I take this opportunity to express the assurances of my highest consideration.</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><u>Definition</u></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><u>Definition for edible offal for adoption:</u> <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><u>Definition:</u> Pursuant to the proposal put forth by the presidency of the EWG on the definition of edible offal, Ecuador supports the proposal and considers the definition fully compatible with its national regulations, which define as edible “giblets” (offal) all giblets authorized by current legislation and certified by veterinary control as fit for human consumption.</p> <ol style="list-style-type: none"> 1. We are in favor of the CCRVDF adopting the definition of edible offal and incorporating it into the glossary of terms and definitions (for residues of veterinary drugs in foods). 	Ecuador
<p><u>Definition:</u> We support the definition, as it delimits the subproducts that are fit for human consumption.</p> <p>The definition should be read in conjunction with the definition of muscle in “Glossary of Terms and Definitions (Residues of Veterinary Drugs in Foods) (CXM 5-1993),” which describes the different tissues that can be present in skeletal muscle.</p> <ol style="list-style-type: none"> 2. We support the proposal. If substantial changes are made, the same process should be followed that has been used thus far—that is, the CCPR proposal is transmitted to the CCRVDF for review and/or approval. 	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.

We support the proposal. We seek clarification on whether the proposal will be initiated in the CCRVDF and later sent to the CCPR for comments. We understand this to be the appropriate procedure, with the aim of continuing the same process used in the past for working on the definition of edible offal.

Chile**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. We support the proposal. It is important to continue this work in order to have new MRLs, facilitating trade in safe food.

5. We support the proposal. It is understood that this approach will be developed within the framework of activities carried out by the electronic working group.

6. We are in favor of both committees studying the possibility of establishing MRL for edible offal on the basis of extrapolation standards. However, one concern to keep in mind is that this should be analyzed on a case-by-case basis and in relation to its intended purpose, for example display format. In addition, Chile is not in agreement with the second part of the sentence, "rather than establishing MRL for the different tissues of edible offal." We should not limit the possibility of carrying out studies and proposals on MRL for edible offal if it were proposed that these be included in the CCRVDF list of priorities.

Chile**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

In consideration of the agreement on the recommendation of the 51st meeting of the CCPR that the advice of JECFA/JMPR be sought regarding appropriate descriptors, it is pertinent that—due to the existence of different circumstances for veterinary drugs whose use or application is essentially direct treatment, unlike the incidental exposure that can occur with pesticides—it would be feasible to request guidance from the risk assessment bodies (JECFA and JMPR) for this type of extrapolation, keeping in mind the difference between veterinary drugs and pesticides, as well as their uses. Finally, with respect to the other proposals in the circular, Ecuador supports the proposal put forth.

Ecuador