CODEX ALIMENTARIUS COMMISSION



Food and Agriculture Organization of the United Nations



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Agenda Item 13
CRD07

ORIGINAL LANGUAGE

# JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS 14<sup>th</sup> Session (virtual) 3-7 and 13 May 2021 Comments of Japan

Japan appreciates the work done by the electronic Working Group chaired by New Zealand and co-chaired by Canada.

Japan would like to make following comments on each recommendation:

### a) Maximum levels

Japan supports starting new work on developing Maximum Levels (MLs) for orange roughy and pink cusk-eel.

For Patagonian toothfish, Japan also supports postponing the discussion for a year and collecting the data of methylmercury for Patagonian toothfish to determine if ML should be established.

Considering the workload of this committee in taking the next step, Japan supports discontinuing the review of MLs for additional fish species.

### b) Sampling plans

Japan supports further refinement of incremental sampling based on the weight/length class approach.

Japan appreciates the electronic Working Group for proposing the tissue area where the incremental sample is taken from whole fish based on weight classes (Table 3 of APPENDIX IV of CX/CF 21/14/11.), in which a certain fish group would be sampled from the muscle close to the tail. In Japan, large fish species, especially tuna, are imported in the form of gilled and gutted with the tail cut off on significantly many occasions (see the following figure). (Moreover, as previously submitted in response to the circular letter (CL 2020/52/OCS-CF), no parts are wasted in cutting of these kinds of fish, and all parts are utilized as food and feed (see Appendix).)

As we commented in CX/CF 20/14/11-Add.1, Japan would like to suggest that there should be an option for large fish such as tuna which incremental samples can be taken from the end portion (close to the tail) because the variation of methylmercury levels across different muscle tissues is limited in general as described in the paragraph 37 in APPENDIX IV of CX/CF 21/14/11 and the tail is the tissue area of the body where the muscles can be taken feasibly with limited damage on the fish in its imported form.

## c) Other risk-management measures

Japan supports a literature review whether it is feasible to develop a guidance paper for risk management options.

#### d) Establishment of the eWG

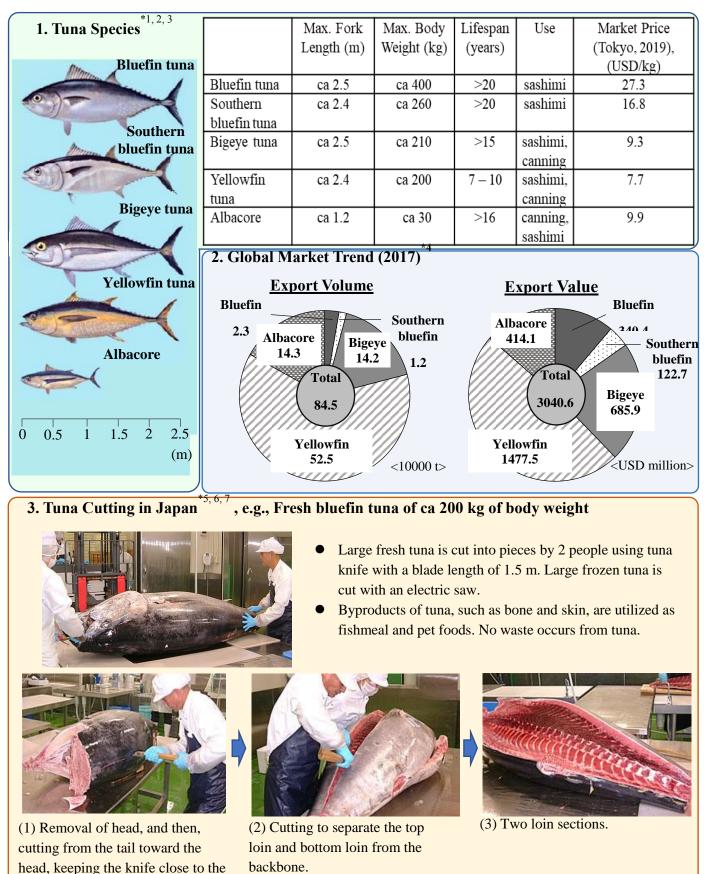
Japan supports the establishment of the eWG for discussing the issues listed in the bullet point d. in paragraph 78 in CX/CF 21/14/11.

# CF14/CRD07



Figure: A wholesale market for tuna in Japan. Tuna is imported in the form of gilled and gutted with the tail cut off. (Fishery Agency. https://www.jfa.maff.go.jp/j/kikaku/wpaper/h30\_h/trend/1/zoom\_p1\_3\_2\_6-02.html)

(Appendix)



(References)

bone.

1) National Research Institute of Far Seas Fisheries, Japan Fisheries Research and Education Agency. http://fsf.fra.affrc.go.jp/maguro20/maguro20.htm (accessed 2020.2.26)

2) Japan Tuna Fisheries Co-operative Association. https://www.japantuna.net/know/dictionary/?id=1497844423-110024 (accessed 2020.2.21)

3) Tokyo Metropolitan Central Wholesale Market. http://www.shijou-tokei.metro.tokyo.jp/ (accessed 2020.3.2)

4) FAO. 2019. FAO year book. Fishery and Aquaculture Statistics 2017.