

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
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Agenda Item 7

CX/PR 01/10
March 2001

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

Thirty-third Session

The Hague, The Netherlands, 2 - 7 April 2001

Harmonization of MRL Setting for Compounds Used Both as Pesticides and as Veterinary Drugs: Proposed Draft Amendments to the Codex Classification of Foods and Animal Feeds

Government comments at Step 3 of the Accelerated Procedure

In response to CL 2000/13-PR, Part B, the following Governments submitted comments: European Community, New Zealand, Thailand and the United States of America.

European Community

The EC considers it important that definitions of meat/muscle are harmonised between JMPR and JECFA. The EC agrees with the proposed amendments in the definitions.

New Zealand

We strongly support the proposed text of the definitions of "milk", as it is identical to the definition from the Codex General Standard for the Use of Dairy Terms (CODEX STAN 206-1999).

Thailand

The revised definitions of meat, mammalian fats, poultry fats and milk are acceptable.

United States of America

Governments are invited to comment on the Classification of Foods and Animal Feeds (Codex Alimentarius, Volume 2, Section 4, pp. 75-78)¹, including the revised definitions of "meat", "mammalian fats", "poultry fats" and "milks", at Step 3 of the Accelerated Procedure as presented in ALINORM 01/24, Appendix V). The proposed revisions are a follow-up to several Codex activities aimed at harmonizing commodity terms among Codex Committees.

¹ Edition unspecified. "Meats", e.g., are defined in Section 2, pp. 278 in the 2nd edition, 1993.

As a point of principle the United States supports harmonization efforts such as this when it can be accomplished without compromising the effectiveness and unique standards associated with relevant committees. In this context the United States notes that the Codex Committee on Pesticide Residues (CCPR) will urgently consider recommending possible new work at its 33rd session related to updating the Codex Classification of Foods and Animal Feeds. This will focus especially on commodities of animal origin and tropical commodities (ALINORM 01/24, para, 181). It is for this reason that U.S. comments following are made without prejudice to possible future revisions of commodity terms needed at the committee level.

Meats – An informal JMPR/JECFA harmonization meeting in February 1999 recommended that the current definition:

“The muscular tissues, including adhering fatty tissues such as intramuscular 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” be amended slightly to change “fatty tissues” to “fat tissues” (CX/PR 00/6). The 2000 CCPR endorsed this change.

Comment –The U.S. accepts this recommendation. If revisions to the Codex Food and Feed Classification is accepted as new work, one revision that the CCPR might consider is replacing “animal carcasses” with the more specific “mammal carcasses”. This is consistent with the current Codex term referring parenthetically to “meats (from mammals other than marine mammals)”.

Also, since the 1999 JMPR/JECFA harmonization meeting recommended it (CX/PR 00/6), further clarification might be considered as to whether all edible muscle tissues are intended to be included. For example, the current Codex definition for edible offal specifies edible tissue and organs other than muscle, but gives examples to include (among others) heart and tongue. These are muscular tissue which strictly speaking might be considered meat as they are in the United States.

Mammalian fats – The current Codex definition is:

“mammalian fats, excluding milk fats, are derived from the fatty tissues of animals (not processed)”.

The proposed revision again is to revise “fatty tissues” to “fat tissues” and again this was agreed to by the 2000 CCPR.

Comment – The United States supports this revision. Similarly and for the same reasons given in comments under meat, if new work to update the Codex Classification of Foods and Feeds is undertaken, consideration might be given to replacing “animals (not processed)” with “mammals (not processed)”

Poultry fats – The current Codex definition is:

“Poultry fats are derived from the fatty tissues of poultry”

The proposed revision is again to revise “fatty tissues” to “fat tissues” and this was agreed by the 2000 CCPR.

Comment – The United States supports this revision. If new work to update the Codex Classification of Foods and Feeds is undertaken, consideration might be given to qualifying these poultry fat tissues as “not processed” as is the case for mammalian fats.

Milks – The current Codex definition is:

“Milks are the mammary secretions of various species of lactating herbivorous ruminant animals, usually domesticated”

It is proposed that it be replaced by:

“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”

The 2000 CCPR endorsed this change. It was advanced to step 8 for inclusion in the general standard for dairy terms based on recommendations of the 1998 Codex Committee on Milk and Milk Products (CCMMP) and adopted by the Commission at its 23rd session in 1999. The invitation for CCPR consideration came from the Secretariat (CX/PR 00/6) based on the CCMMP and Commission actions.

Comments – The United States recommends that a decision on this substantial change be deferred until the likely CCPR new work has an opportunity to consider the full implications for CCPR. There would appear to be no urgency to make the proposed revision now.

Aspects that might need to be considered include removal of reference to species of “usually domesticated lactating herbivorous ruminant animals”. That is the historical residue database for pesticide MRLs. The new proposal refers more vaguely to “milking animals” which is not defined, at least in the definition. The current classification lists specific animal species intended to be covered by “usually domesticated lactating herbivorous ruminant animals”.

Another aspect that may need consideration is proposed language that refers to milk “without either addition to it or extraction from it, intended for consumption as liquid milk or for further processing”. While this definition likely will be consistent with the commodity from which residue data are generated, it may not always be consistent with milks that move in trade, milk considered suitable for direct beverage consumption and which might be analyzed for enforcement. For example, in the United States milk that is in final package form for beverage use must have been pasteurized or ultrapasteurized, contain milk solids and fat within certain limits, either of which may be adjusted by addition or removal within certain limits. Such milk may also contain certain added vitamins or flavoring agents.

In a similar context, the current Codex Alimentarius Vol. 2 definition for milk is followed by explanatory text that milk means “exclusively the normal mammary excretion obtained from one or more milkings without either addition thereto or extraction therefrom”. This is consistent with language in the proposed revision. On the other hand, additional Vol. 2 explanatory text following the explanatory text just cited states that “notwithstanding the provisions in the preceding paragraph, “the term “milk” may be used for milk treated without altering its composition, or for milk, the fat content of which has been standardized under domestic legislation.” That would to some extent accommodate U.S. regulations, but not in its entirety (e.g., no mention of addition or removal of milk solids).

The point is that regardless of whether the proposed revision is ultimately made, there are several aspects to the language that may need to be carefully considered before a revision is adopted and the appropriate forum may be during the likely new CCPR work on updating the Classification for Foods and Feeds.