CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 8(a) **CX/RVDF 12/20/9**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Twentieth Session

San Juan, Puerto Rico, 7-11 May 2012

PROPOSED DRAFT SAMPLING PLANS FOR RESIDUE CONTROL FOR AQUATIC ANIMAL PRODUCTS AND DERIVED EDIBLE PRODUCTS OF AQUATIC ORIGIN (TABLE C, ANNEX B OF CAC/GL 71-2009)

(at Step 3 of the Procedure)

(Report of the CCRVDF Electronic Working Group on the revision of the Sampling Plans for Residue Control for Aquatic Animal Products and Derived Edible Products of Aquatic Origin, led by the United States of America with the assistance of Algeria, Argentina, Australia, Brazil, Chile, China, Costa Rica, France, Germany, Japan, Mexico, Morocco, New Zealand, Philippines, Thailand, United Kingdom, FAO and IFAH)

Governments and international organizations wishing to submit comments at Step 3 on the proposed draft Proposed draft Sampling Plans for Residue Control for Aquatic Animal Products and Derived Edible Products of Aquatic Origin (Table C, Annex B of CAC/GL 71-2009) (*see* Annex 1) are invited to do so **no later than 31 March 2012** as follows: U.S. Codex Office, Food safety and Inspection Service, US Department of Agriculture, Room 4861, South Building, 14th Independence Avenue, S.W., Washington DC 20250, USA (Telefax: +1 202 720 3157 ; or ***preferably*** E-mail: CCRVDF-USSEC@fsis.usda.gov , with a copy to the Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, Viale delle Terme di Caracalla, 00153 Rome, Italy (Telefax: +39.06.5705.4593; E-mail: Codex@fao.org, ***preferably***).

Background

1. At the 19th session of the CCRVDF (Burlington, Vermont, USA, 30 August – 3 September 2010), the Committee agreed to establish an electronic Working Group, led by the United States and open to all interested members and observers and working in English only. The Committee agreed that the electronic Working Group would consider the comments in response to CL 2010/47-RVDF with the mandate of preparing a revised table for aquatic products, including minimum quantity required for laboratory sample and instruction for collection. The table is intended for future inclusion in the *Guidelines for the Design and Implementation of National Regulatory Food Safety Assurance Programmes Associated with the Use of Veterinary Drugs in Food Producing Animals* (CAC/GL 71-2009) after these concerns are addressed.

Proceedings of the electronic working group

2. The electronic Working Group worked through email and an electronic forum established by the United Kingdom. In revising the Table, the electronic Working Group considered:

- The appropriate minimum quantity required for laboratory sample in the context of current analytical technology; and
- The number and size of subsamples (increments) required.

3. The following aspects were also taken into account: the need for statistical input to ensure that the laboratory sample is representative of the entire lot; the difference between single source sampling and multi-source sampling; the fact that residue may vary in the different edible tissues; and the difference in import verification vs. domestic surveillance and compliance.

4. The Working Group received comments from Australia, Brazil, and Iran in response to CL 2010/47-RVDF. Additional comments have been provided by Argentina, Australia, Brazil, Chile, Costa Rica, Germany, Japan, the Philippines, Thailand, the United Kingdom, the United States of America, and FAO. This Table reflects consideration of all comments received.

Proposal

5. Table C has been revised to reflect the comments shared in the Working Group. The following points summarize the recommended revisions made to Table C:

a. A minimum quantity required for laboratory sample of 500g is recommended. A larger laboratory sample might increase the statistical representativeness of the sample. As most analytical methods require only 10g or less, however, 500g would allow repeat analysis as needed, including the use of screening and confirmatory analysis.

b. The phrase "edible tissue" is added to both the instructions and minimum quantity required for laboratory sample to add clarity. This language change also takes into account where muscle with adhering skin is consumed and where the whole edible part of the animal is subjected for analysis (e.g., shellfish).

c. As suggested by one country, unit is defined as a single fish, shell fish, fish portion, package of fish, or can of fish making up a consignment.

d. Fish flour and fish meal are removed from the Table on the recommendation of one country as these are not normally destined for human consumption.

e. As the instructions for collection and minimum quantity required for laboratory sample were the same for each size fish and shellfish, the table has been collapsed into two sections.

6. The electronic Working Group proposes the table attached in Annex 1 for discussion by the 20th Session of the CCRVDF. The electronic Working Group was unable to come to consensus regarding the proposed language for instructions for collection. Significant differences in the two proposed options for instructions for collection are underlined.

Discussion

7. The United Kingdom has commissioned a study to look at sampling statistics for fishery products. The final report of this study is expected around May 2012. One country recommended that the sampling plans be reviewed based on the forthcoming results of the United Kingdom study.

8. Significant comments on the appropriate number of subsamples (increments) were received from the CL response and within the Working Group. While the original Table had called for 12 subsamples, the proposed number of subsamples varied greatly. One country expressed that providing a specific number of subsamples would make implementation of the table easier for countries, but another country pointed out that other commodities listed in Appendix B of CAC/GL 71-2009 used the wording "take sufficient units to meet laboratory sample size requirements." Based on the comments from two countries, sufficient units should be determined based on the type of fish, crustacean, or shellfish, the homogeneity (consistency) of production, and the analytical method used. One country noted that the language provided in options 1a and 2a allow national authorities to use judgment as to the number of units from which to collect subsamples.

9. The electronic Working Group was unable to come to consensus on the language included in the "Instructions for Collection" section, and has included two options in the proposed sampling plan for consideration by the Committee.

Recommendation

10. The electronic Working Group recommends that the upon reaching consensus on the collection instruction language, the Committee consider the proposed Table (see Annex 1) for inclusion in the *Guidelines for the Design and Implementation of National Regulatory Food Safety Assurance Programmes Associated with the Use of Veterinary Drugs in Food Producing Animals* (CAC/GL 71-2009).

Annex 1

PROPOSED DRAFT SAMPLING PLANS FOR RESIDUE CONTROL FOR AQUATIC ANIMAL PRODUCTS AND DERIVED EDIBLE PRODUCTS OF AQUATIC ORIGIN (TABLE C, ANNEX B OF CAC/GL 71-2009)

(at Step 3 of the Procedure)

Table C: Aquatic animal products

Commodity	**Instructions for collection**	**Minimum quantity required for laboratory sample**
VII. Class B – Type 08 (Aquatic Animal Products)		
Fish and shellfish – packaged and unpackaged	1a. Collect appropriate edible tissue from sufficient[1] units[2] randomly selected from each lot to meet laboratory sample size requirements. **Or** 1b. Collect appropriate edible tissue from one or more units[2] randomly selected within each lot making up the consignment. The number of units[2] sampled depends on the size of the units[2] in the lot.	500g edible tissue
VII. Class E – Type 17 (Derived Edible Products of Aquatic Animal Origin)		
Canned fish and shellfish products	2a. Collect sufficient[1] units[2] randomly selected from each lot to meet laboratory sample size requirements. **Or** 2b. Collect one or more units[2] selected from each lot making up the consignment.	500g edible tissue

[1]The sufficient number of units should be determined based on the type of fish, crustacean or shellfish, the homogeneity (consistency) of production, and the method of analysis. Sufficient number of units should take into consideration sampling within and between lots.

[2]Unit means a single fish, shell fish, fish portion, package of fish, or can of fish making up a consignment.