

CODEX ALIMENTARIUS COMMISSION



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Agenda Item 8a

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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

Comments of Egypt, European Union, Ghana, Nigeria, Thailand

EGYPT

Egypt is in full agreement with the recommendation of EWG in considering the proposed aquatic animal products or derived products to be included in the guidelines for the design and implementation of National Regulation Food Safety Assurance Programs associated with the use of veterinary drugs in food producing animals.

EUROPEAN UNION

The European Union and its Member States (EUMS) would like to thank the United States for leading the work on developing the sampling plan for residue control of products derived from aquatic animals.

The EUMS support the sampling plan as proposed in Annex 1 of document CX/RVDF 12/20/9. The EUMS prefer options 1a and 2a for the instructions for collection of samples.

GHANA

Table C : Aquatic animal products

Specific Comments

The sampling design is problematic and the sampling size of 500gm does not indicate whether it is of the unit, lot or consignment.

Rationale

Ghana associates with option 1a. for sampling “Collect appropriate edible tissue from sufficient units randomly selected from each lot to meet laboratory sample size requirements.” However, we suggest that the sampling method should be reviewed for clarity.

NIGERIA

Nigeria commends the e-Working Group led by the United States of America for coming up with this document.

Nigeria considers the 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) adequate and should be advanced to the next step.

THAILAND

The 19th session of the CCRVDF (Burlington, Vermont, USA, 30 August – 3 September, 2010) agreed to establish EWG led by the United States in order to prepare a revised table (Table C: aquatic products, under the Session Guidance on sample type and quantity for different commodities). Such table is a part of the Guideline 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). The general objective of the table is as a guidance on sample type and quantity for drug residue analysis as either for verification on the national assurance system associated with the use of veterinary drug in food producing animals or for port of entry secondary verification on drug residue in products from animals. For the principal of sampling plan, sample size related to statistical concern of how sample be a good lot representative and the objective of each verification activities

have been already mentioned in a guideline. Therefore, the structure and the contents in Table A, B and C with providing the instruction for sample collection but different in type of commodity should be consistency in principal.

To make the Table C consistency and on the same principle with the previous Table A and B, we suggest the content of instruction for sample collection in the table should be based on packaging both outer and individual inner product package. The instruction for collection of the difference aquatic animal product sample should provide more details for the sampling operator. Therefore Thailand would like to propose the revised Table C as follows;

Table C: Aquatic animal products

Commodity	Instructions for Collection	Minimum quantity required for laboratory sample
VII. Class B – Type 08 (Aquatic Animal Products)		
A. Packaged fish – fresh, frozen, smoked, cured, or shellfish (except oysters)		
1. Wholesale package	Collect an interior unit from a selected container.	500 g of edible tissue
2. Retail package	Collect a number of unit, from a selected containers to meet laboratory sample size.	500 g of edible tissue
B. Bulk fish (fish size < 2.5 kg)	Collect muscle from 1 – 3 fishes, depending on size.	500 g of edible tissue
C. Bulk fish (fish size > 2.5 kg)	Collect muscle from 1 fish.	500 g of edible tissue
D. Bulk Shellfish	Collect one or more shellfish, depending on size.	500 g of edible tissue
E. Other fish and shellfish Products (including oysters)	Collect an interior unit from a selected container.	500 g of edible tissue after remove shell
VII. Class E – Type 17 (Derived Edible Products of Aquatic Animal Origin)		
A. Canned fish and shellfish products (except oysters)	Collect one or more units for sufficient edible tissue.	500 g of edible tissue
B. Other fish and shellfish products – fish flour and meal	Use sample schedule. Collect primary samples to achieve a sample size of at least 500 g	500 g