

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 8(a)

CRD 25

Original Language Only

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)

Comments at Step 3 from Canada

Canada appreciates the opportunity to comment on the proposed sampling plans, and offers the following specific comments.

1. Canada supports the minimum quantity required for laboratory samples of 500 g.

Rationale – Canada acknowledges that the actual size needed for analysis (~ 10 g) is far less than the amount needed for representativeness. When sampling, the actual amount needed for analysis (repeats / confirmation) is important but is often far less than the amount needed to be representative. Therefore a 500 g sample would be more reasonable.

2. For sampling of “fish and shellfish – packaged and unpackaged” Canada supports the use of wording in option 1(a) “Collect appropriate edible tissues from sufficient¹ units² randomly selected from each lot to meet laboratory sample size requirements” under the “instruction for collection” with some revisions in footnote 1 as suggested below.
3. For sampling of “canned fish and shellfish products” Canada supports the use of wording in option 2(a) “Collect sufficient¹ units² randomly selected from each lot to meet laboratory sample size requirements” under the “instruction for collection” with some revisions in footnote 1 as suggested below.

4. Canada suggests that the footnote 1 be revised as follows:

¹The 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, and the verification of a processing establishment's controls related to veterinary drugs in fish and fishery products. (Note: suggested addition in italics and underlined).

Rationale for revision: Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003), and that of many member countries including Canada, emphasizes the application of HACCP principles in processing establishments. Prior knowledge on how these principles are applied in an operation, or the history of a specific producer/processor in meeting the prescribed food standards, could be used in determining the number of units to be tested. Therefore Canada suggests that these factors be taken into consideration when determining the number of units to be sampled.