

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 7(a/b)

CX/PR 23/54/6-Add.1

June 2023

**ORIGINAL LANGUAGE ONLY**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON PESTICIDE RESIDUES

54<sup>th</sup> Session

Beijing, P.R. China

26 June - 1 July 2023

REVISION OF THE CLASSIFICATION OF FOOD AND FEED (CXA 4-1989)

CLASS B – PRIMARY FOOD COMMODITIES OF ANIMAL ORIGIN AND

CLASS E - PROCESSED FOODS OF ANIMAL ORIGIN (ALL TYPES)

AND

TABLES ON EXAMPLES OF REPRESENTATIVE COMMODITIES FOR COMMODITY GROUPS IN DIFFERENT TYPES UNDER  
CLASS B AND CLASS E (AT STEP 4)

(FOR INCLUSION IN THE PRINCIPLES AND GUIDANCE FOR THE SELECTION OF REPRESENTATIVE COMMODITIES FOR  
THE EXTRAPOLATION OF MRLS FOR PESTICIDES TO COMMODITY GROUP (CXG 84-2012))

Comments at Step 3 in reply to CL 2023/34-PR

*Comments of Canada, Chile, Egypt, Iraq, Japan, Kenya, Norway, Thailand*

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/34-PR<sup>1</sup> issued in April 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

#### Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby annexed and presented in tabulated format.

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<sup>1</sup> <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>  
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR>

**GENERAL COMMENTS**

COMMENT	MEMBER/OBSERVER
<p>BACKGROUND</p> <ul style="list-style-type: none"> <li>• CCPR53 (2022) agreed to re-establish the EWG on the revision of the Classification, chaired by USA and co-chaired by The Netherlands, to continue consideration of Class B, Primary Food Commodities of Animal Origin, Class E, Processed Foods of Animal Origin, and consideration of the corresponding representative commodities.</li> </ul> <p>Class B</p> <ul style="list-style-type: none"> <li>• The EWG considered Class B from CCPR53. Additional groups, subgroups and commodities were proposed for inclusion in Class B.</li> <li>• The EWG again considered Class B for CCPR54.</li> <li>• The current Class B includes 5 types, 16 groups, 2 reserved groups and no subgroups.</li> <li>• Based on discussions and comments from the EWG, the revised Class B includes: <ul style="list-style-type: none"> <li>○ 6 types, 18 groups, no reserved groups and 65 subgroups.</li> <li>○ The additional groups include groups for Amphibians and Reptiles (replaces reserved Group 046) and Invertebrate animals group (replaces reserved Group 047).</li> <li>○ Numerous commodities have also been added to the respective groups/subgroups.</li> </ul> </li> </ul> <p>Class E</p> <ul style="list-style-type: none"> <li>• The EWG considered Class E for CCPR53. Additional groups, subgroups and commodities were proposed for inclusion in Class E.</li> <li>• The EWG again considered Class E for CCPR54.</li> <li>• The current Class E includes 4 Types, 8 groups (and 1 reserved groups) and no subgroups.</li> <li>• Based on discussions and comments from the EWG, the revised Class E includes: <ul style="list-style-type: none"> <li>○ 10 groups with Group 081 Dried muscle and other avian products replacing Reserved Group 081.</li> <li>○ Group 083 Secondary invertebrate food commodities of animal origin has also been added.</li> <li>○ Additional subgroups (13) have been added along with numerous commodities.</li> </ul> </li> </ul> <p>CANADA'S POSITION</p> <ol style="list-style-type: none"> <li>1. Canada would like to thank the EWG on Classification of Food and Feed for their ongoing efforts in revising Class B and E.</li> <li>2. Canada supports the proposed revisions to Class B, including the added number of types, groups (amphibians and reptiles and invertebrate animals), subgroups and commodities to the respective groups/subgroups. Canada also supports the selection of the proposed representative commodities, as listed in Table 9.</li> <li>3. Canada supports the proposed revisions to Class E, including the added number of groups (dried muscle and other avian products and secondary invertebrate food commodities of animal origin), subgroups and commodities to the respective groups/subgroups. Canada also supports the selection of the proposed representative commodities, as listed in Table 10.</li> <li>4. Canada endorses the advancement of the revised Class B and Class E, and representative commodities, in the Step Procedure.</li> </ol>	<p><b>Canada</b></p>

COMMENT	MEMBER/OBSERVER
Chile apoya las conclusiones del GTE, liderado por Estados Unidos, y considera que la revisión de la Categoría B y la Categoría E y los correspondientes cuadros 9 y 10 de productos representativos están listos para su adopción final por la Comisión del Codex Alimentarius en su 46.º período de sesiones	Chile
Egypt appreciates the work done in the document & agrees on it	Egypt
Agree with no comments	Iraq
<p>Regarding page39, Marine mammals, Class B</p> <p>“Type 8 Aquatic animal products Group 044 Group Letter Code WM”,</p> <p>Amend the explanatory text as indicated below.</p> <p>“The muscle and other product originating from various species of marine mammals are consumed in some areas of the world. “</p> <p>And, delete the following sentence: “However, by a majority of countries around the world, the hunting of sea mammals is considered controversial and a ban on commercial whaling is recognized.”</p> <p>(Reason)</p> <p>As Japan commented at CCPR53, this document is intended for classification of food in view of the pesticide residues. The text Japan proposes to delete does not have any information related to pesticide residues. In addition, it does not relate to Codex mandate, e.g. consumer protection and fair trade.</p> <p>In the EWG following CCPR53, there has been no explicit objection to Japan’s proposal. Therefore, this amendment should be adopted.</p>	Japan
<p><u>Comment</u> : Kenya thanks the EWG Chair USA and co chair Netherlands for the work that they have done. Kenya supports the revision of class B and E and their advancement to the next Codex Standard elaboration process.</p>	Kenya
<p>Our comments are related to the revised Class B as contained in Appendix I below and the respective tables on examples of selection of representative commodities.</p> <p><b>Specific comments on Class B and the text in the tables of representative commodities:</b></p> <p><i>Regarding Exposure route:</i> We suggest adding “feed exposure” in the text (see below).</p> <p><i>Reason:</i> Farmed fish species are mainly exposed to pesticides by formulated feeds which contain processed plant ingredients and hence pesticides.</p> <p>For reference to examples for salmonids and sea bream, see following publications (Glencross et al., 2020; Nacher-Mestre et al., 2015; Nacher-Mestre et al., 2014; Portoles et al., 2017; Regueiro et al., 2017).</p> <p><i>Regarding Portion of the commodity and the text “to which the MRL applies (and which is analysed). Whole commodity (in general after removing the digestive tract)”.</i> We suggest deleting “whole commodity minus digestive”.</p> <p><i>Reason:</i> Using the tract is not applicable to all fish species. Several larger fish species, especially species in Group 041 and Group 42, only an edible part of the muscle is consumed and not the “whole commodity minus digestive tract.</p> <p>Firstly, pesticides do not distribute evenly throughout organs, and removing the digestive tract will still leave organs (gill, swim bladder, kidney) that are not consumed but do contribute to pesticide residues if analysed as “whole commodity minus digestive tract”.</p> <p>Secondly, several (seafood) fish species are so large (&gt; 1 or 6 kg) that sampling a whole commodity is impractical.</p> <p>Furthermore, we suggest using the following sampling definition in relation to sampling pesticides in fish: <i>The middle part of the fish is where the centre of gravity is. This is located in most cases at the dorsal fin (in case the fish has a dorsal fin) or halfway between the gill opening and the anus.</i></p>	Norway

COMMENT	MEMBER/OBSERVER
<p><b>TYPE 8 AQUATIC ANIMAL PRODUCTS</b></p> <p>Aquatic animal products are derived from the edible parts of various aquatic animals, usually wild, harvested for food.</p> <p><b>Group 040-042 Fish</b></p> <p>Group 040-042 Fish are gilled, aquatic vertebrate and/or cartilaginous animals of various zoological families and species, usually wild, as caught and prepared for wholesale and retail distribution. Exposure to pesticides is through <b>feed exposure</b> (to be inserted), animal metabolism or through water pollution. The fleshy parts of the animals and, to a lesser extent, milt and roe are consumed. Portion of the commodity to which the MRL applies (and which is analysed). <del>Whole commodity (in general after removing the digestive tract)</del> (to be deleted).</p> <p>The exposure via feed is also mentioned in section “Group 041 Diadromous fish Class B Type 8” in which it is mentioned that “ trout...The latter species especially may be exposed to pesticides <i>through compound fish feed</i> and also through water pollution”.</p> <p><b>Group 041 Diadromous fish</b></p> <p><u>Class B</u></p> <p><b>Type 8 Aquatic animal products Group 041 Group Letter Code WD</b></p> <p>The fleshy parts of the animals and, to a lesser extent, roe and milt are consumed. Portion of the commodity to which the MRL applies (and which is analysed): <del>Whole commodity (in general after removing the digestive tract)</del> (to be deleted).</p> <p><b>Group 042 Marine fish</b></p> <p><u>Class B</u></p> <p><b>Type 8 Aquatic animal products Group 042 Group Letter Code WS</b></p> <p>The marine fishes generally live in open seas. They are all or nearly all wild species, caught and prepared (often deep-frozen) for wholesale and retail distribution. Exposure to pesticides is mainly through water pollution and animal metabolism. Especially the fleshy parts of the animals and to a lesser extent roe and milt are consumed. Portion of the commodity to which the MRL applies (and which is analysed): <del>Whole commodity (in general, after removing the digestive tract.</del></p> <p>WS 0126 Coalfish, <b>saithe</b>, see Pollack, WS 0946 <i>Pollachius virens</i> L.; syn: <i>Gadus virens</i> L Coalfish is named “saithe” in the UK with same Latin name “<i>Pollachius virens</i> L.;</p> <p><b>Please check the spelling of Latin species names:</b></p> <ul style="list-style-type: none"> <li>• WS 0935 <i>Merlucius merlucius</i> =&gt; <i>Merluccius merluccius</i></li> <li>• WS 0946 <i>Polachius polachius</i> =&gt; <i>Pollachius pollachius</i></li> <li>• WS 0954 <i>Gadus merlangus</i>: The accepted name is <i>Merlangius merlangus</i>, <i>Gadus merlangus</i> is synonym (Fishbase.org)</li> <li>• WS 0945 <i>Pleuronectus platessa</i> =&gt; <i>Pleuronectes platessa</i> (both places)</li> <li>• WS 0941 <i>Scomber, scombrus</i> =&gt; <i>Scomber scombrus</i>. <i>Scomber Scombrus</i> =&gt; <i>Scomber scombrus</i></li> <li>• WS 0130 <i>Sprattus sprattus phalericus</i> – Replace with or add <i>Sprattus sprattus</i> (European sprat)</li> <li>• WS 0950 <i>Anarichas spp</i> =&gt; <i>Anarhichas spp.</i></li> <li>• IM 1003 <i>Mytilus smaragdinus</i> is not accepted name, could be replaced with <i>Perna viridis</i>. We also suggest adding <i>Perna canaliculus</i> to the list</li> <li>• IM 1005 Add <i>Chlamys islandica</i>, Iceland scallop</li> </ul>	

COMMENT	MEMBER/OBSERVER
<p><b>Publication list</b></p> <p>EC, 2023. Working Group Meeting: Sampling and analysis of products of plant and animal origin for the control of pesticide residues Revamping Directive 2002/63/EC → PLAN/2023/636. Glencross, B.D., Baily, J., Berntssen, M.H.G., Hardy, R., MacKenzie, S., Tocher, D.R., 2020. Risk assessment of the use of alternative animal and plant raw material resources in aquaculture feeds. Reviews in Aquaculture 12, 703-758.</p> <p>Nacher-Mestre, J., Serrano, R., Beltran, E., Perez-Sanchez, J., Silva, J., Karalazos, V., Hernandez, F., Berntssen, M.H.G., 2015. Occurrence and potential transfer of mycotoxins in gilthead sea bream and Atlantic salmon by use of novel alternative feed ingredients. Chemosphere 128, 314-320.</p> <p>Nacher-Mestre, J., Serrano, R., Portoles, T., Berntssen, M.H.G., Perez-Sanchez, J., Hernandez, F., 2014. Screening of Pesticides and Polycyclic Aromatic Hydrocarbons in Feeds and Fish Tissues by Gas Chromatography Coupled to High-Resolution Mass Spectrometry Using Atmospheric Pressure Chemical Ionization. Journal of Agricultural and Food Chemistry 62, 2165-2174.</p> <p>Portoles, T., Ibanez, M., Garlito, B., Nacher-Mestre, J., Karalazos, V., Silva, J., Alm, M., Serrano, R., Perez-Sanchez, J., Hernandez, F., Berntssen, M.H.G., 2017. Comprehensive strategy for pesticide residue analysis through the production cycle of gilthead sea bream and Atlantic salmon. Chemosphere 179, 242-253.</p> <p>Regueiro, J., Negreira, N., Hannisdal, R., Berntssen, M.H.G., 2017. Targeted approach for qualitative screening of pesticides in salmon feed by liquid chromatography coupled to traveling-wave ion mobility/quadrupole time-of-flight mass spectrometry. Food Control 78, 116-125.</p>	
<p>1. Specific comments on Group 032, mammalian edible offal:</p> <p>Thailand would like to propose the deletion of text pertaining to examples of animal tissues that are not considered to be edible offal in paragraph 3 of the introductory remark of Group 032; Edible offal (Mammalian), as follows:</p> <p>“The group name and definitions are in conformity with those recorded in the Codex Standards 89-1981 and 98-1981, Codex Standard for luncheon meat and Codex Standard for cooked cured chopped meat respectively: “Edible offal means such offal’s means as have been passed as fit for human consumption, but not including lungs, ears, scalp, snout (including lips and muzzle), mucous membranes, sinews, genital system, udders, intestines and urinary bladder”. In the former Classification of Food and Food Groups in the Guide to Codex Maximum Limits for Pesticide Residues 1978: CAC-PR 1-1978 the name Meat by-products was used for this group”.</p> <p>This text can cause confusion because the exclusion of animal tissues is not in accordance with a recent definition of “edible offal”, which covers a wide variety of offal that has been consumed and traded globally, based on the outcomes of work by the CCRVDF’s EWG on Edible Animal Tissues. Besides, the CAC/PR 1-1978 is obsolete and the word “meat by-products” may confuse readers with animal feed. Therefore, we propose to delete the whole text of paragraph 3.</p> <p>2. Specific comments on Group 038, Avian edible offal:</p> <p>Thailand would like to propose the deletion of text mentioning the CAC/PR 1-1978 and poultry by-products in the first paragraph of the introductory remark of Group 038; Avian, Edible offal of, as follows:</p> <p>“In the former Classification of Food and Food Groups in the Guide to Codex Maximum Limits for Pesticide Residues 1978: CAC/PR 1-1978 the name Poultry by-products was used for this group.”</p> <p>The CAC/PR 1-1978 is obsolete and the word “poultry by-products” may confuse readers to understand that some avian tissues are not relevant to edible commodities.</p>	<p><b>Thailand</b></p>