

# CODEX ALIMENTARIUS COMMISSION

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Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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CL 2025/47-PR/RVDF

December 2025

**TO:** Codex Contact Points  
Contact Points of international organizations having observer status with Codex

**FROM:** Secretariat, Codex Alimentarius Commission,  
Joint FAO/WHO Food Standards Programme

**SUBJECT:** Request for comments on the harmonization of food descriptors for commodities of animal origin  
used by CCPR and CCRVDF

**DEADLINE:** 10 February 2026

## BACKGROUND

1. Based on the recommendations of the 25th Session of the Codex Committee on Residues of Veterinary Drugs (CCRVDF25, 2021)<sup>1</sup>, the 52<sup>nd</sup> Session of the Codex Committee on Pesticide Residues (CCPR52; 2021)<sup>2</sup>, the 81<sup>st</sup> Session of the Codex Executive Committee (CCEXEC81, 2021)<sup>3</sup>, the 44<sup>th</sup> Session of Codex Alimentarius Commission (CAC44, 2021)<sup>4</sup> agreed to establish a Joint CCPR/CCRVDF Electronic Working Group (EWG) chaired by the United States of America (USA), to address procedural and technical issues related to the establishment of single harmonized maximum residue limits (MRLs) for compounds with dual use.
2. The Joint EWG made initial recommendations to CCRVDF26 (2023)<sup>5</sup> and CCPR54 (2023)<sup>6</sup>. Both committees agreed to continue the Joint EWG and recommended the following new terms of reference (ToRs) that CAC46 (2023)<sup>7</sup> subsequently endorsed, including the appointment of the USA as Chair of the EWG and Brazil and New Zealand as Co-Chairs:
  - **ToR #1:** Continue the Joint EWG, chaired by the USA and co-chaired by Brazil and New Zealand, to identify and prioritize issues affecting both committees, recommend ways to address them, and inform CAC accordingly.
  - **ToR #2:** Develop a list of compounds with dual use as a pesticide and veterinary drug for which no or only one Codex MRL has been established, with member countries providing the information to populate this list.
  - **ToR #3:** Identify dual-use compounds that have different Codex MRLs for a similar edible commodity of animal origin and recommend a single, harmonized MRL(s) for the compound(s) and affected commodity(ies) on a case-by-case basis. The EWG might recommend that CCRVDF/CCPR consider selecting the higher MRL value.
  - **ToR #4:** Consider the matter related to harmonized food descriptors to be used by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) and the Joint FAO/WHO Meeting on Pesticide Residues (JMPR).

<sup>1</sup> [REP21/RVDF25](#), paras. 44, 106-116, 140-150

<sup>2</sup> [REP21/PR52](#), paras. 12, 180-185

<sup>3</sup> [REP21/EXEC81](#), paras. 33-34

<sup>4</sup> [REP21/CAC44](#), paras. 64-66

<sup>5</sup> [REP23/RVDF26](#), paras. 103-130

<sup>6</sup> [REP23/PR54](#), paras. 36-37, 210-219

<sup>7</sup> [REP23/CAC46](#), para. 106

3. The Joint EWG provided a status of work update to CCPR55 (2024)<sup>8</sup> and CCRVDF27 (2024)<sup>9</sup>. Both Committees indicated their continued support for the EWG and agreed to explore the possibility of a virtual session of the Joint EWG and possibly a virtual Joint session of CCPR and CCRVDF to address the current terms of reference.
4. CAC47 endorsed the recommendation of CCEXEC87 to explore the scheduling of a virtual session of CCPR and CCRVDF to consider the recommendations of the virtual meeting of the Joint CCPR/CCRVDF Electronic Working Group (EWG), noting that this would be the first time such an arrangement was made and might be used in the future to address common issues involving different Codex committees.<sup>10</sup>
5. Although the Joint EWG has made progress, the Chair and co-Chairs have found that the operating exclusively within the Codex online forum, followed by recommendations being presented to each committee separately, might not be the most effective approach to reach consensus on substantial issues (e.g., MRL harmonization and food descriptor harmonization). Therefore, in consultation with the Codex Secretariat, the Chair and co-Chairs are making use of other communication tools, such as a Circular Letter, to obtain feedback from members.

#### REQUEST FOR COMMENTS

6. Codex members and observers are invited to provide comments on the discussion paper on harmonization of food descriptors for commodities of animal origin used by both CCPR and CCRVDF presented in the Annex, Recommendations 1 to 10.
7. The Annex is uploaded to the Codex Online Commenting System (OCS)<sup>11</sup>. Comments provided through the OCS should follow the guidance in paragraphs 10-14.
8. Harmonization of terms and description will also help with the establishment of single harmonized MRLs for dual-use compounds. Therefore, in submitting comments on reply to this circular letter, Codex members and observers are also invited to consider the request for comments in CL 2025/48-PR/CCRVDF on harmonization of Codex MRLs for dual-use compounds.
9. Member countries' Codex Contact Points should coordinate with their veterinary and plant protection agencies to provide joint comments on harmonized food descriptors for commodities of animal origin used by CCPR and CCRVDF.

#### GUIDANCE ON THE PROVISION OF COMMENTS

10. Comments should be submitted through the Codex Contact Points of Codex members and observers using the OCS.
11. Contact Points of Codex members and observers may login to the OCS and access the document open for comments by selecting "Enter" in the "My reviews" page, available after login to the system.
12. Contact Points of Codex members and observers' organizations are requested to provide proposed changes and relevant comments/justifications on a specific paragraph (under the categories: editorial, substantive, technical, and translation) and/or at the document level (general comments or summary comments). Additional guidance on the OCS comment categories and types can be found in the OCS Frequently Asked Questions (FAQs)<sup>12</sup>.
13. Other OCS resources, including the user manual and short guide, can also be found on the Codex website<sup>13</sup>.
14. For questions on the OCS, please contact [Codex-OCS@fao.org](mailto:Codex-OCS@fao.org).

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<sup>8</sup> [REP24/PR55](#), paras. 274-280

<sup>9</sup> [REP24/RVDF27](#), paras. 64, paras. 115-124

<sup>10</sup> [REP24/EXEC87](#), para 49; [REP24/CAC47](#), paras 22(i), 131

<sup>11</sup> <https://ocs.codexalimentarius.org/>

<sup>12</sup> [http://www.fao.org/fileadmin/user\\_upload/codexalimentarius/doc/OCS/Codex\\_OCS\\_FAQs\\_2017-11-06.pdf](http://www.fao.org/fileadmin/user_upload/codexalimentarius/doc/OCS/Codex_OCS_FAQs_2017-11-06.pdf)

<sup>13</sup> <https://www.fao.org/fao-who-codexalimentarius/resources/ocs/en/>

## ANNEX

### DISCUSSION PAPER ON HARMONIZED FOOD DESCRIPTORS TO BE USED BY THE JOINT FAO/WHO EXPERT COMMITTEE ON FOOD ADDITIVES (JECFA) AND THE JOINT MEETING OF EXPERTS ON PESTICIDE RESIDUES (JMPR) WHEN RECOMMENDING MRLS FOR RESIDUES OF VETERINARY DRUGS AND PESTICIDES IN FOODS

Prepared by the Joint Electronic Working Group between  
the Codex Committee on Residues of Veterinary Drugs in Food and the Codex Committee on Pesticide Residues

(Chaired by the United States of America and Co-chaired by Brazil and New Zealand)

#### Background

1. The 24<sup>th</sup> Session of Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF24, 2018) established an Electronic Working Group (EWG) to coordinate with an EWG on the *Classification of Food and Feed* established by the Codex Committee on Pesticide Residues (CCPR). The task was to create a common definition for edible offal and for any other edible animal commodities of relevance<sup>1</sup>. The work of these two EWGs led to harmonized definitions for edible offal, meat, muscle and fat that were agreed to by CCRVDF25 (2021)<sup>2</sup> and CCPR53 (2022)<sup>3</sup>.
2. The CCRVDF EWG also recommended CCRVDF seek guidance from the Joint FAO/WHO Expert Committee on Food Additives (JECFA) on appropriate food descriptors, such as “fat”, “fat with skin”, “fat/skin”, and “skin”, with input also being sought from the Joint Meeting of Experts on Pesticide Residues (JMPR).<sup>4</sup> At the 25<sup>th</sup> Session of CCRVDF (CCRVDF25, 2021), the JECFA Secretariat reminded CCRVDF that it was JECFA and JMPR that asked the EWG to define the terms “fat”, “fat with skin”, “fat/skin”, and “skin” and noted that providing food descriptors was more of a responsibility of a risk managers than that of risk assessors. Therefore, CCRVDF25 (2021) noted that developing descriptors for these commodities could be further considered by the CCRVDF EWG.<sup>5</sup>
3. The CCRVDF EWG then recommended that CCRVDF reconsider and advise how to address the matter related to food descriptors.<sup>6</sup> In response, the 26<sup>th</sup> Session of CCRVDF (CCRVDF26, 2023)<sup>7</sup> tasked the Joint EWG between CCPR and CCRVDF with considering the matter related to harmonized food descriptors to be used by JECFA and JMPR. The 54<sup>th</sup> Session of the Codex Committee on Pesticide Residues (CCPR54, 2023) agreed with this additional task for the Joint EWG.<sup>8</sup>

#### Objective

4. The objective of this discussion paper is to examine the food descriptors for commodities of animal origin used by CCRVDF and CCPR with the view of identifying those used by both committees and proposing harmonized descriptors as needed.

#### Approach

5. Compared to CCPR, CCRVDF recommends adoption of MRLs in a fewer number of commodities. Therefore, CX/MRL 2-2021, *Maximum Residue Limits (MRLs) and Risk Management Recommendations (RMRs) for Residues of Veterinary Drugs in Foods*, was used as the basis for identifying food descriptors for commodities of animal origin used by both committees. Briefly, the unique commodities found in CX/MRL 2-2021 were identified. Next, any descriptors for these commodities were obtained from either the *Glossary of Terms and Definitions (Residues of Veterinary Drugs in Foods)* (CXA 5-1993), or the recent revision of Class B – Primary Food Commodities of Animal Origin of the *Classification of foods and animal feeds* (CXA 4-1989) agreed by CCPR54 (2023)<sup>9</sup> and adopted by CAC46 (2023)<sup>10</sup> and compared. Each edible commodity is discussed below followed by recommendations to be considered by CCPR55 (2024) and CCRVDF.

<sup>1</sup> [REP18/RVDF24](#), paras. 85 - 95

<sup>2</sup> [REP21/RVDF25](#), paras. 108 – 111

<sup>3</sup> [REP22/PR53](#), paras. 179 – 181

<sup>4</sup> [CX/RVDF 21/25/9](#), para. 23

<sup>5</sup> [REP21/RVDF25](#), paras. 114 – 115

<sup>6</sup> [CX/RVDF 23/26/10](#), para. 12

<sup>7</sup> [REP23/RVDF26](#), paras. 103 - 124

<sup>8</sup> [REP23/PR54](#), para. 217

<sup>9</sup> [REP23/PR54](#), Appendix VIII

<sup>10</sup> [REP23/CAC46](#), para. 98, Appendix II

**Discussion****Edible Offal**

The current descriptors for edible offal are listed in Table 1.

**Table 1.** Current descriptors for edible offal used by CCRVDF and CCPR

Commodity	Committee in which term is used	CCRVDF Descriptor	CCPR Descriptor
Edible Offal	CCRVDF & CCPR	Edible offal are those parts of an animal, apart from the skeletal muscle, fat and attached skin, that are considered fit for human consumption.	Edible offal are those parts of an animal, apart from the skeletal muscle, fat and attached skin, that are considered fit for human consumption.

**RECOMMENDATION 1 (Edible Offal):** The descriptors for edible offal are the same between CCRVDF and CCPR. Therefore, no harmonization action is needed.

**Eggs**

The current descriptors for eggs are listed in Table 2.

**Table 2.** Current descriptors for eggs used by CCRVDF and CCPR

Commodity	Committee in which term is used	CCRVDF Descriptor	CCPR Descriptor
Eggs	CCRVDF & CCPR	The fresh edible portion of the spheroid body produced by female birds, especially domestic fowl.	Eggs are the fresh edible portion of the body produced by female birds, especially domestic fowl.

**RECOMMENDATION 2 (Eggs):** The descriptors for eggs appear to be aligned between CCRVDF and CCPR; however, it seems that the word “spheroid” has been omitted from the CCPR descriptor. The EWG proposes that CCPR edit their descriptor within CXA 4-1989 for eggs to include the word “spheroid” in front of the word “body.”

**Fat**

The current descriptors for fat are listed in Table 3.

**Table 3.** Current descriptors for fat used by CCRVDF and CCPR

Commodity	Committee in which term is used	CCRVDF Descriptor	CCPR Descriptor
Fat	CCRVDF & CCPR	The lipid-based tissue that is trimmable from an animal carcass or cuts from an animal carcass. It may include subcutaneous, omental or perirenal fat. It does not include interstitial or intramuscular carcass fat or milk fat.	<ol style="list-style-type: none"> <li>1. Fat is the food-based tissue that is trimmable from an animal carcass or cuts from an animal carcass. It may include omental or perirenal fat. It does not include interstitial or intramuscular carcass fat or milk fat. (CXA 4-1989, Class B, Primary Food Commodities of Animal Origin, as revised by CCPR54 (2023), REP23/PR54, Appendix VIII)</li> <li>2. Fat is the lipid-based tissue that is trimmable from an animal carcass or cuts from an animal carcass. It may include omental or perirenal fat (REP22/PR53, Appendix VIII).</li> </ol>

**RECOMMENDATION 3 (Fat):** The descriptors for fat appear to be aligned between CCRVDF and CCPR. However, it seems that some words have been left out of the CCPR descriptor. As CCPR53 (2022) previously harmonized their descriptor for fat with that of CCRVDF<sup>11</sup>, the EWG proposes that CCPR make the slight edits to their descriptor for fat such that it aligns with the CCRVDF descriptor for fat in line with the decision taken in 2022 which should have been reflected in the revised Classification when CCPR finalized the revision of Class B Primary Food Commodities of Animal Origin in 2023.

<sup>11</sup> [REP22/PR53](#), paras. 179 – 181

### **Fillet & Muscle plus skin in natural proportions**

The terms fillet and muscle plus skin in natural proportion seem to be used only by CCRVDF, but CCRVDF does not have descriptors for these commodities within CXA 5-1993. Within CCRVDF, both terms are only used when establishing MRLs in tissues from finfish (e.g., salmon and trout). Also, it appears that CCRVDF sometimes uses the term fillet, while at other times, the term muscle plus skin in natural proportion is used. Further complicating the issue is that, on some occasions, when the term fillet is used, the notes within CX/MRL 2-2021 state “muscle plus skin in natural proportion.”

**RECOMMENDATION 4.1 (Fillet and Muscle plus skin in natural proportion):** The EWG proposes that CCRVDF determine whether one or both terms are needed.

If both terms are needed, the EWG proposes that CCRVDF establish separate descriptors as follows:

**Fillet:** *Fillet is the boneless, skinless portion of muscle tissue obtained from fish.*

**Muscle plus skin in natural proportions:** *Muscle plus skin in natural proportions is the entire fillet with the overlying skin from one or both sides of the fish (scales can be included or excluded based on consumption and practicality of removal).<sup>12</sup>*

If only one term is needed, the EWG proposes that CCRVDF establish one descriptor as follows:

**Fillet:** *Fillet is the boneless portion of muscle tissue obtained from fish with the overlying skin from one or both sides of the fish (scales can be included or excluded based on consumption and practicality of removal).*<sup>12</sup>

**RECOMMENDATION 4.2 (Fillet and Muscle plus skin in natural proportion):** The EWG invites CCPR to consider whether the terms fillet and muscle with skin in natural proportions and the proposed descriptors are relevant to establishing MRLs for residues of pesticides.

### **Honey**

The current descriptors for honey are listed in Table 4.

**Table 4.** Current descriptors for honey used by CCRVDF and CCPR

Commodity	Committee in which term is used	CCRVDF Descriptor	CCPR Descriptor
Honey	CCRVDF & CCPR	None	Honey is the natural sweet substance produced by honeybees from the nectar of plants or from secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which the bees collect, transform by combining with specific substances of their own, deposit, dehydrate, store and leave in the honeycomb to ripen and mature

**RECOMMENDATION 5 (Honey):** The descriptor for honey used by CCPR aligns with the *Codex Standard for Honey* (CXS 12-1981); however, CCRVDF does not have a descriptor for honey. The EWG proposes that CCRVDF incorporate the CCPR descriptor for honey within CXA 5-1993 to be consistent with the *Codex Standard for Honey*.

### **Kidney**

Both committees use the term kidney when establishing MRLs; however, neither has a descriptor for this commodity.

**RECOMMENDATION 6 (Kidney):** The EWG:

- (i) invites CCRVDF and CCPR to consider whether the proposed descriptor for kidney is suitable for the purpose of establishing MRLs for residues of veterinary drugs and pesticides, and if so,
- (ii) proposes the following descriptor for kidney: *A type of edible offal, kidney is an organ meat identified by its anatomy obtained from the peritoneal cavity of the carcass of vertebrate animals.*

<sup>12</sup> Adapted from VICH GL57: *Studies to Evaluate the Metabolism and Residue Kinetics of Veterinary Drugs in Food-Producing Species: Marker Residue Depletion Studies to Establish Product Withdrawal Periods in Aquatic Species*

**Liver**

Both committees use the term liver when establishing MRLs; however, neither has a descriptor for this commodity.

**RECOMMENDATION 6 (Liver):** The EWG:

- (i) invites CCRVDF and CCPR to consider whether the proposed descriptor for liver is suitable for the purpose of establishing MRLs for residues of veterinary drugs and pesticides, and if so,
- (ii) proposes the following descriptor for liver: *A type of edible offal, liver is a lobular organ meat identified by its anatomy obtained from the peritoneal cavity of the carcass of vertebrate animals.*

**Milk**

The current descriptors for milk are listed in Table 5.

**Table 5.** Current descriptors for milk used by CCRVDF and CCPR

Commodity	Committee in which term is used	CCRVDF Descriptor	CCPR Descriptor
Milk	CCRVDF & CCPR	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.	Milks are the mammary secretions of various species of lactating herbivorous ruminant animals, usually domesticated. In conformity with the Codex Alimentarius Code of Principles concerning Milk and Milk products, the term "Milk" shall mean exclusively the normal mammary excretion obtained from one or more milkings without either addition thereto or extraction therefrom.

**RECOMMENDATION 7 (Milk):** The descriptors for milk are similar between CCRVDF and CCPR; however, there are differences. The CCRVDF descriptor aligns with the definition of milk in the *Codex Standard for the use of dairy terms* (CXS 206-1999). The EWG proposes that CCPR incorporate the CCRVDF descriptor for milk within CXA 4-1989 to be consistent with the definition for milk within the *Codex Standard for the use of dairy terms*.

**Muscle**

The current descriptors for muscle are listed in Table 6.

**Table 6.** Current descriptors for muscle used by CCRVDF and CCPR

Commodity	Committee in which term is used	CCRVDF Descriptor	CCPR Descriptor
Muscle	CCRVDF & CCPR	Muscle is the skeletal tissue of an animal carcass or cuts of these tissues from an animal carcass that contains interstitial and intramuscular fat. The muscular tissue may also include bone, connective tissue, tendons, as well as nerves and lymph nodes in natural portions. It does not include edible offal or trimmable fat.	Muscle is the skeletal tissue of an animal carcass or cuts of these tissues from an animal carcass that contains interstitial and intramuscular fat. The muscular tissue may also include bone, connective tissue, tendons, as well as nerves and lymph nodes in natural portions. It does not include edible offal or trimmable fat.

**RECOMMENDATION 8 (Muscle):** The descriptors for muscle are the same between CCRVDF and CCPR. Therefore, no action is needed.

**Skin**

The term skin, alone, seems to be used only by CCPR, and CCPR does not have a current descriptor for this commodity; however, it is listed as a type of edible offal in CXA 5-1993.

**RECOMMENDATION 9 (Skin):** The EWG proposes that CCPR consider whether this descriptor for skin is suitable for the purpose of establishing MRLs for pesticide residues. The EWG also invites CCRVDF to consider whether the term skin and the proposed descriptor are relevant to establishing MRLs for residues of veterinary drugs. The EWG proposes the following descriptor for skin:

*A type of edible offal, skin is the outer covering of vertebrate animals considered suitable for human consumption after removal of inedible growths or filaments (e.g., feathers or hair).*

**Fat/Skin, Skin + Fat, Skin plus fat, and Skin/Fat**

Various combinations of the words “skin” and “fat” are used by CCRVDF; however, CCRVDF does not have a current descriptor for this commodity. The combinations used include “Fat/Skin,” “Skin + Fat,” “Skin plus fat,” and “Skin/Fat.” These terms do not seem to be used by CCPR. Within CCRVDF, the use of these terms is limited to MRLs established in avian species and pigs. The EWG proposes that CCRVDF (and CCPR, if applicable) use only one term to describe this commodity and that they use the term skin with fat in natural proportions.

**RECOMMENDATION 10 (Fat/Skin, Skin + Fat, Skin plus fat, and Skin/Fat):**

The EWG:

- (i) proposes that CCRVDF consider whether this descriptor for skin with fat in natural proportions is suitable for the purpose of establishing MRLs for residues of veterinary drugs.
- (ii) invites CCPR to consider whether the term skin with fat in natural proportions and the proposed descriptor are relevant to establishing MRLs for residues of pesticides.
- (iii) proposes the following descriptor for skin with fat in natural proportions:

*Skin with fat in natural proportions is the skin of the animal, along with any fat that is naturally part of the skin’s composition and any fat that adheres to the skin in the same proportions as found on the animal carcass, taking into consideration the species, breed, and age of the animal.*