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ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 53rd SESSION OF THE CODEX COMMITTEE ON PESTICIDE RESIDUES

4th – 8th and 13th JULY 2022 - Virtual Meeting

AGENDA ITEM 7(d)

Revision of the Classification of Food and Feed (CXA 4-1989):

*Coordination of work between CCPR and CCRVDF: Class B – Primary food commodities of animal origin
Harmonization of meat mammalian maximum residue limits between CCPR and CCRVDF: Harmonized definition for edible offal and other edible animal tissues*

Objectives

This document offers a review and analysis of the agenda items planned for discussion at the 53rd session of the **Codex Committee on Pesticide Residues (CCPR)**, scheduled to take place virtually July 4th – 8th and 13th, 2022. This document is intended for possible use by the Codex communities of practice, promoted by [GFORSS](#) and [PARERA](#), as part of their contribution to enhancing awareness and supporting effective participation in international food standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of agenda items, their background and a discussion of some considerations. This analysis is indicative in nature and does not represent an official position of the organizations mentioned above ([PARERA](#) and [GFORSS](#)), their membership or their management. It provides a synthesis and analysis of the work currently under discussion by the CCPR, which may be useful for delegations from Arab countries to prepare their positions taking into account the needs and specificity of the region and the potential impact of the proposed food standards.

This analysis is prepared as part of the **Codex Initiative for the Arab Region: Arab Codex Initiative**, implemented by [PARERA](#) and [GFORSS](#), hosted and coordinated by the [Arab Industrial Development, Standardization and Mining Organization \(AIDSMO\)](#) and funded by the US Codex Office, US Department of Agriculture.

The focus of the analysis of agenda items 7(d) and 8 of CCPR53, relates to the **coordination of work between CCPR and CCRVDF related to the harmonization of meat mammalian MRLs (Class B – Primary food commodities of animal origin), the harmonization of definitions for edible offal and other edible animal tissues, as well as the status of work of the joint EWG on compounds for dual use.**

**It is important to note that experts – members of the Arab Expert Working Group – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the Arab Expert Working Group proceedings is based on each expert's own credentials and experience, which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

Agenda Item 7 (d) : Class B – Primary food commodities of animal origin Harmonization of meat mammalian maximum residue limits between CCPR and CCRVDF: Harmonized definition for edible offal and other edible animal tissues

Document

CX/PR 22/53/9 and CX/PR 22/53/9-Add.1

CCPR53 is invited to consider:

- ❖ the definition for “edible offal” as agreed by CCRVDF25 and adopted by CAC44.
- ❖ A proposed revised definition made by Germany in consideration of issues with “meat” and “skin”.
- ❖ The definition for “meat”, “muscle” and “fat” as proposed by the JECFA/JMPR Working Group.

Background

CCPR50 (April 2018) and CCRVDF24 (April 2018) considered the recommendation of CCEXEC73 on closer collaboration between CCPR and CCRVDF and noted the support of delegations on the need to develop innovative ways for better collaboration between JMPR/JECFA and CCPR/CCRVDF for optimal evaluation of dual use compounds, which could include improved collaboration proposals for harmonized MRLs, residue definitions, etc.; improved synchronization of work between CCPR and CCRVDF Working Group on Priorities in particular as to the prioritization of compounds with dual uses for evaluation by JECFA/JMPR.

When considering a definition for edible offal tissues for the establishment of MRLs for veterinary drugs, the Chair of CCRVDF24 noted that the lack of harmonization of the definition for offal between CCPR and CCRVDF, would result in confusion for enforcement, and could hamper trade and affect public health, in particular when setting MRLs for dual purpose compounds (i.e. a different definition for setting MRLs for residues from the use as pesticides and as veterinary drug or for setting single MRLs for compounds with dual uses). Once alignment between CCPR and CCRVDF is achieved, CCRVDF could decide if further discussion was required. In the interim, CCRVDF would continue to deal with other tissues on a case-by-case basis.

The Codex Secretariat reminded CCRVDF of the need for cooperation between CCPR and CCRVDF as recommended by CCEXEC73 and clarified that the CCRVDF/EWG could coordinate informally with the CCPR/EWG (as there were no formal procedures available) to reach a harmonized definition.

CCRVDF25, held in 2021 discussed a proposed definition for edible offal based on a proposal made by CCPR51 (2019) and considered how skin would be treated as there were situations where skin is consumed separately from the muscle, which would be considered as edible offal, and situations where skin was consumed attached to muscle/fat. CCRVDF25 noted that the definition was kept as broad as possible to remain flexible to cover all possible edible offals that are significantly consumed and traded internationally.

CCRVDF25 agreed to (i) forward the definition of edible offal as amended by the Committee for adoption by the Codex Alimentarius Commission (CAC) and inclusion in the Glossary of Terms and Definitions and (ii) recommend CCPR to adopt the same definition for consistency and facilitation of establishment of MRLs for compounds with dual purposes. The definition agreed to by CCRVDF was: “Edible offal: Those parts of an animal, apart from the skeletal muscle, fat and attached skin, that is considered fit for human consumption”. This definition was adopted by the 44th Session of the Codex Alimentarius Commission (CAC44, 2021).



CCPR52 could not consider this proposal in detail and agreed to re-establish the EWG on the revision of the Classification, chaired by USA and co-chaired by The Netherlands, to continue working on the revision of the Classification as well as matters related to edible animal tissues (including edible offal) in collaboration with the CCRVDF/EWG on Edible Offal.

Analysis

❖ Definition for edible offal as proposed by CCRVDF25

The EWG continued to work on the definitions of edible animal tissues, including edible offal, in collaboration with the CCRVDF/EWG on edible offal based on the recommended definition provided by CCRVDF25:

“Edible offal: *“Those parts of an animal, apart from the **skeletal muscle**, fat and attached **skin** that are considered fit for human consumption”.*

Possible issues were noted regarding the definition of **“skeletal muscle”** (Thailand) and **“skin”** (Germany). The problem here is not that the definitions differ when edible offals are included or not in the definition of meat but:

1. Double regulation of certain product appears, e. g.:
 - Poultry meat with skin and skin,
 - Whole fish and edible offals of fish.
2. That appendages containing skeletal muscle such as trotters and hooves should be clearly defined whether they are meat or edible offal.
3. Regarding the term **“skeletal muscle”** as some edible offal consists of skeletal muscle, while there is also **non skeletal such as heart muscle**.
4. As proposed by the JECFA/JMPR Working Group on the revision of the guidance document for residue definition, i.e. harmonized definition/descriptors for **“meat”**, muscle” and **“fat”**, were not discussed in the EWG.
5. For mammals except marine mammals and poultry, **meat with adhering skin is not part of the sampling procedure**. Thus, the MRL for poultry with adhering skin is based on data on meat.

❖ Definition for edible offal and meats as proposed by Germany

- **For Edible Offal:** Those parts of an animal, apart from the skeletal muscle and adhering fat tissues, that are considered fit for human consumption.
- **For “meats”:** Meats are the muscular tissues, including adhering fatty tissues such as intramuscular, intramuscular and subcutaneous fat from animal carcasses or cuts of these as prepared for wholesale or retail distribution in a **“fresh”** or frozen state.”

❖ **Definition for edible animal tissues (meat, fat, muscle)** As proposed by the JECFA/JMPR Working Group on the revision of the guidance document for residue definition



Tissue	Definition	Portion of the commodity to which the MRL applies	Annotation
Fat	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.	The whole commodity. For fat-soluble compounds the fat is analyzed and MRLs apply to the fat. For those compounds where the trimmable fat is insufficient to provide a suitable test sample, the whole commodity (muscle and fat but without bone) is analysed and the MRL applies to the whole commodity (e.g., rabbit meat).	To address variable interstitial fat contents in muscle, a modification on the annotation "fat" to MRLs is suggested "for monitoring and regulatory purposes, muscle (including interstitial and intramuscular fat) is to be analyzed and the result compared to the sum of the [MRL for muscle × (1-fraction fat)] + [MRL fat × fraction fat], based on a determination of the fraction of fat present in the muscle".
Meat	The edible part of any mammal		
Muscle	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.	The whole commodity without bones.	

EXAMPLE: sample of muscle containing 20% fat

	Fraction	MRL
Muscle	80%	1 mg/kg
Fat	20%	10 mg/kg
Sample	$MRL = [1 \times 0.8] + [10 \times 0.2] = 2.8 \text{ mg/kg}$.	

General Comments

- ❖ Australia supported the definition and noted its similarity to the definition in Class B, Group 032. Chile supported the same definition for edible offal as agreed to by CCRVDF. Canada also supported the definition proposed by CCRVDF.
- ❖ Thailand had concerns regarding the term "skeletal muscle" as some edible offal consists of skeletal muscle, while there is also non skeletal such as heart muscle. Thailand also noted that appendages containing skeletal muscle such as trotters and hooves should be clearly defined whether they are meat or edible offal.
- ❖ Germany noted that clarification was needed for the terminology of "skin" and the need for corresponding consumption data. In a subsequent comment, Germany provided a modified definition of meat and edible offal.



- ❖ Regarding the definition for edible animal tissues (meat, fat, muscle) as proposed by the JECFA/JMPR Working Group, Canada is unclear how a consistent and transparent application of the annotation “fat” to MRLs can be achieved when % fat fractions are not always readily available and likely to be variable among muscle groups within an individual animal.
- ❖ Egypt offered comments where it agreed with the harmonization of meat mammalian MRLs between CCPR and CCRVDF as proposed by the JECFA/JMPR working group on the revision of the guidance document for residue definition.
- ❖ The EU offered partial support to the proposed definition of fat and suggested further specifying that fat may also include adhering skin, which is relevant for pigs.
- ❖ The EU also offered partial support to the proposed definition of muscle and suggested further specifying that bones should be removed before analysis, since the MRL applies to “the whole commodity without bones”. Moreover, the use of the term “muscular tissue” creates ambiguity and should therefore be avoided.
- ❖ The EU indicated that it was of the opinion that “muscle” should be used instead of “meat”. This also corresponds to the terminology used in the EU in the framework of MRL setting for pesticide residues and veterinary medicinal products.

Conclusions and recommendation

- ❖ It will be important to bring the different definitions and Guidelines used by CCPR and CCRVDF in line, aiming, where possible, for the establishment of single/harmonized MRLs for the same tissue/food for compounds with dual uses.
- ❖ The definitions offered by Germany seem more aligned with consumption habits of the Arab region. These definitions could therefore be supported by Arab Codex delegations.
- ❖ Arab Codex delegations may support the revision of the guidance document for residue definition, as proposed by the JECFA/JMPR Working Group for “meat”, muscle” and “fat” and may suggest adding the definition of skin in another separate category of tissue.
- ❖ Regarding the term “skeletal muscle”, as some edible offal consists of skeletal muscle, while others consist of **non skeletal tissue such as heart muscle**, it may be suggested to remove the “skeletal muscle” from the definition of edible offal and adopt the definition of muscle as proposed by the JECFA/JMPR Working Group on the revision of the guidance document for residue definition.

From a general perspective, Arab competent authorities should attempt to invest in the collection of consumption data from the Arab region in relation with meat and edible offal, that will be needed for the establishment of harmonized MRLs of edible tissues.