

European Union Comments
CODEX COMMITTEE ON PESTICIDE RESIDUES
52nd Session

CL 2020/13-PR (REV):

**REQUEST FOR COMMENTS ON THE HARMONIZATION OF MEAT
MAMMALIAN MAXIMUM RESIDUE LIMITS BETWEEN THE CODEX
COMMITTEE ON PESTICIDE RESIDUES AND THE CODEX COMMITTEE ON
RESIDUES OF VETERINARY DRUGS IN FOODS (CLASSIFICATION OF FOOD
AND FEED: CLASS B - PRIMARY COMMODITIES OF ANIMAL ORIGIN)**

European Union Competence

European Union Vote

The European Union (EU) would like to thank the Electronic Working Group (eWG) on the Revision of the Classification of Food and Feed chaired by the United States of America and co-chaired by the Netherlands in collaboration with the eWG of CCRVDF on definition of edible tissues chaired by Kenya and co-chaired by New Zealand for the preparation of the draft on the revision of the Codex Classification of Foods and Animal Feeds.

The EU partially supports the proposed definition of **fat** and suggests further specifying that fat may also include adhering skin, which is relevant for pigs, as reported below:

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 as well as adhering skin. It does not include interstitial or intramuscular carcass fat or milk fat.

The EU partially supports the proposed definition of **muscle** and suggests 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 suggests using the following wording:

Muscle is the skeletal tissue of an animal carcass or cuts of these tissues from an animal carcass that contains interstitial and intramuscular fat. It 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. Bones should be removed before analysis.

The EU does not support the proposed definition of **meat** as *the edible part of any mammal*. The definition is too wide and covers also other edible parts of mammals, which are not to be considered as meat, such as edible offal, including liver and kidney, and fat tissue without associated muscle tissue, such as pig lard. Instead, the EU proposes to define meat as *muscle and associated trimmable fat in natural proportions but without bone*.

The EU supports aligning the terms used between CCPR and CCRVDF and is 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.