

Annex 6e Criteria for residues of chemicals in fishery products intended for export to Japan

This document is prepared for guidance by July 2018. For regulatory purposes consult also the original legal documents.

(last updated 22 July 2018)

1. Environmental Contaminants

| Substance/Substance Group | Product | Provisional level |
|---------------------------|--|--|
| PCBs | Fish and shellfish etc. (edible parts) from oceans and the open sea | 0.5 ppm |
| | Fish and shellfish (edible parts) in inland seas and bays including inland waters | 3 ppm |
| Mercury | All fish and shell fish etc. <u>excluding</u> tuna fish (tuna, sword fish, bonito), fish from rivers (not including fish from lakes), and deep sea fish and shellfish (sebastodes marinus, alfonsino, black cod, queen crab, ivory shell, shark) | Total: 0.4 ppm Methyl mercury (as mercury): 0.3 ppm |
| Biotoxins | PSP (Paralytic shellfish poisoning toxin) All shellfish (edible parts) and bivalve eater (T.acutidens) (edible part) | 4 MU/g ¹ |
| | DSP (Diarrheal shellfish poisoning toxin) All shellfish (edible parts) | 0.05 MU/g |

¹⁾ MU = Mouse Units represents the amount of toxin that causes death in a mouse of 20g body weight in 15 minutes in case of paralytic shellfish poisoning toxin, while in case of diarrrheal shellfish poisoning toxin 1MU represents the amount of poison that causes death in a mouse of 16-20g body weight in 24 hours.

2. Residues

Japan has regulation for residues of Agricultural Chemicals in Foods, including pesticides and pharmacological active substances of veterinary medicines. The principles of the regulation can be seen on <https://www.mhlw.go.jp/english/topics/foodsafety/positivelist060228/index.html>. The allowed substances and related MRLs can be seen on the database of Japanese Chemical Research Foundation <http://db.ffcr.or.jp/front/>

2.1. Residues of pesticides

Japan accept residues of a number of pesticides in different products of aquatic origin. Information about substances and their MRLs for different groups of products can be found on <http://db.ffcr.or.jp/front/>. For products of aquatic origin the MRLs are divided on

- Fish
- Salmoniformes (such as salmon and trout)

- Anguilliformes (such as eel)
- Perciformes (such as bonito, horse mackerel, mackerel, sea bass, sea bream and tuna)
- Other fish
- Shelled molluscs
- except shelled molluscs
- Crustaceans
- Other aquatic animals

A number of substances are listed as “not to be detected in food” and should be considered prohibited. These substances can be seen on <http://www.ffcr.or.jp/en/zanryu/the-japanese-positive/positive-list-system---not-detected.html>

For substances without and MRL and not on the list of “not to be detected in food”, *a default limit of 0,01ppm applies.*

All criteria are subject to testing with analytical methods which specific detection limits. Information about the analytical methods can be found on: <http://www.ffcr.or.jp/en/zanryu/mrls-of-agricultural-chemicals-feed-additives-and-veterinary-drugs-in-food/-revision-of-mrls-of-agricultural-chemicals-feed-additives-and-veterinary-drugs-in-foods-september-1.html>

2.2. Residues of pharmacological active substances in veterinary medicines

Japan prohibits the residues of certain pharmacological substances in any food including all fishery products <http://www.ffcr.or.jp/en/zanryu/the-japanese-positive/positive-list-system---not-detected.html> the substances summarized in the context of the Myanmar regulation are in the table below

Japan accept residues of a number of pharmacological substances in different products of aquatic origin. Information about substances and the MRLs in different groups of products can be found on <http://db.ffcr.or.jp/front/> . For products of aquatic origin the MRLs are divided on

- Fish
- Salmoniformes (such as salmon and trout)
- Anguilliformes (such as eel)
- Perciformes (such as bonito, horse mackerel, mackerel, sea bass, sea bream and tuna)
- Other fish
- Shelled molluscs
- except shelled molluscs
- Crustaceans
- Other aquatic animals

As a principle only substances authorized by the national competent authorities should be found in products from Myanmar. In products produced in Myanmar, the DOF Decision 2/2014 as amended by Directive 2/2017 shall therefore apply unless in cases where the Japanese regulation is more strict than the Myanmar regulation.

The Japanese MRLs/prohibitions are summarized, in the context of the Myanmar regulation in the table below.

| | Status in Myanmar by DOF Directive 2/2014 as amended by DOF Directive 2/2017 | Status in Japan – general or specifically regarding aquatic products |
|---|---|--|
| Aristolochia spp. and preparations thereof | Prohibited | Not listed |
| Chloramphenicol | Prohibited (MRPL = 0.3 µg/kg 2) | Prohibited |
| Chloroform | Prohibited | Not listed |
| Chlorpromazine | Prohibited | Not listed |
| Colchicine | Prohibited | Not listed |
| Dapsone | Prohibited | Not listed |
| Dimetridazole | (As low possible, certainly no greater than 5 µg/kg) | Listed as to be "Not detected" in foods |
| Metronidazole | (As low as possible, certainly no greater than 5 µg/kg) | Listed as to be "Not detected" in foods |
| Nitrofurans and metabolites (furaltadone, nitrofurantoin, nitrofurazone (MRPL: 1 µg/kg for all*)) | | Listed as to be "Not detected" in foods |
| Ronidazole | prohibited | Listed as to be "Not detected" in foods |
| Diethylstilbestrol | prohibited | Listed as to be "Not detected" in foods |
| Malachite green | Prohibited (MRPL = | Listed as to be "Not detected" in foods |
| Ampicillin: | 50 µg/kg - in muscle and skin in natural proportion | 50 µg/kg - except Perciformes (such as bonito, horse mackerel, mackerel, sea bass, sea bream and tuna) where the accepted level is 60 µg/kg |
| Amoxicillin: | 50 µg/kg - in muscle and skin in natural proportion | 50 µg/kg - except Perciformes (such as bonito, horse mackerel, mackerel, sea bass, sea bream and tuna) where the accepted level is 20 µg/kg. |
| Erythromycin: | | 60 µg/kg in Perciformes (such as bonito, horse mackerel) |
| Sulfonamides: | | Default level 10µg/kg applies |
| Tetracycline: | | Default level 10µg/kg applies |
| Oxytetracycline: | 100 µg/kg - in muscle and skin in natural proportion | 200 µg/kg |
| Lincomycin: | 100 µg/kg - in muscle and skin in natural proportion | 50 µg/kg in Perciformes (such as bonito, horse mackerel, mackerel, sea bass, sea bream |

| | | |
|---------------|---|-------------------------------|
| | | and tuna) |
| Enrofloxacin: | 100 µg/kg - in muscle and skin in natural proportion | Default level 10µg/kg applies |

All criteria are subject to testing with analytical methods which specific detection limits. Information about the analytical methods can be found on: <http://www.ffcr.or.jp/en/zanryu/mrls-of-agricultural-chemicals-feed-additives-and-veterinary-drugs-in-food/-revision-of-mrls-of-agricultural-chemicals-feed-additives-and-veterinary-drugs-in-foods-september-1.html>

The Japanese annual schedule for testing food products at import is published on the website of the Ministry of Health Labor and Welfare

<https://www.mhlw.go.jp/english/topics/importedfoods/18/index.html>