codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION Twenty-first Session Rome, 3 - 8 July 1995

REPORT OF THE NINTH SESSION OF THE CODEX COORDINATING COMMITTEE FOR ASIA Beijing, China 24 - 27 May 1994

SUMMARY AND CONCLUSIONS

The Eighth Session of the Codex Coordinating Committee for Asia reached the following conclusions:

MATTERS FOR CONSIDERATION BY THE COMMISSION OR ITS EXECUTIVE COMMITTEE

- recommended to the Executive Committee the elaboration of Guidelines for Use of the Term "Halal", with the understanding that the Guidelines would be elaborated by the Codex Committee on Food Labelling based on the Malaysian draft (para. 104);
- recommended that the Commission should take necessary action to request FAO and WHO to consider providing technical assistance to the countries to initiate a network on street foods among the countries of the Region (para. 97);
- requested the Commission to ask IAEA/FAO and WHO for additional technical guidance and assistance for overcoming the current low level of acceptance of irradiated foods by consumers (para. 132);
- requested that in converting Codex Regional Standard to Worldwide Standards the Commission should continue to give careful consideration to the comments made by member countries, especially to the conditions for production of natural mineral waters, as this was rapidly increasing on a global basis (para. 139); and
- nominated Dr. Yuzo Hayashi of Japan for appointment by the 21st Commission as the Codex Coordinator for Asia (para. 133).

MATTERS OF INTEREST TO THE COMMISSION

- expressed its appreciation to FAO and WHO for providing substantial support to the Region, and requested these organizations to provide further assistance as possible to help improve the control of food quality and safety within the Region (para. 26);
- received updated reports on acceptances of the Codex Standards including Codex Maximum Residue Limits for Pesticides (paras. 31-40);
- received reports on food control and safety from all participating countries (paras. 41-69);
- agreed that the updated information on the Agreements on the Application of Sanitary and Phytosanitary Measures and on Technical Barrier to Trade should be provided at the next session (para. 75);
- received proposals from a consumer organization on consumer involvement in Codex work and reports on current situation and policy concerning this matter at national level from many delegations and supported the further involvement of consumers in Codex work (paras. 76-93);
- recommended to return the Code of Practice for Street Foods to Step 3 without further elaboration (para. 97);

- decided to return the Proposed Draft Standards for the following commodities to Step 3 with the understanding that they should be revised by the relevant drafting country groups and circulated for government comments well before the next session (para. 120);
 - Canned bamboo shoots;
 - Dried anchovies;
 - Fish crackers from marine and freshwater fish, crustacean and molluscan shellfish;
 - Pickles; and
 - Chutney.
- agreed that Thailand, with assistance from the Secretariat, would draft the Guidelines for Codex Contact Points and National Codex Committees based on Thai system, to be used not only in the Region but throughout the World (para. 126);
- received a report on the practice of food irradiation in the Region (paras. 127-132); and
- agreed to amend current status of work by the Committee (paras. 137-138).

TABLE OF CONTENTS

APPENDIX II REVISED AGENDA FOR THE SESSION	T at agraph
OPENING OF THE SESSION	INTRODUCTION
ADOPTION OF THE AGENDA	
ELECTION OF VICE-CHAIRMAN MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES. 13 - 20 MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM FAO, WHO AND OTHER INTERNATIONAL ORGANIZATIONS REVIEW OF ACCEPTANCES OF CODEX STANDARDS AND MAXIMUM RESIDUE LIMITS FOR PESTICIDES BY COUNTRIES IN THE REGION / REPORT ON COMMISSION ACTIVITIES REGARDING THE PROMOTION OF ACCEPTANCE OF CODEX STANDARDS, MAXIMUM RESIDUE LIMITS AND THE CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD INFORMATION AND MEMBER GOVERNMENT REPORTS ON FOOD CONTROL AND FOOD SAFETY ISSUES 41 - 69 REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (ACREEMENTS ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE). 70 - 75 CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION 76 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) 94 - 98 LABELING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 107 - 108 Dried Anchovies 108 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS APPENDIX II REVISED ACRIMANTS APPENDIX II REVISED AGRINDARD FOR THE SESSION APPENDIX II PROPOSED DRAFT STANDARD FOR THE TERM "HALAL" 31 - 33 APPENDIX II PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES APPENDIX II PROPOSED DRAFT STANDARD FOR THE TERM "HALAL" 31 - 33 APPENDIX II PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES APPENDIX II PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES 13 - 20 MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM FAO, WHO AND OTHER INTERNATIONAL ORGANIZATIONS 21 - 30 REVIEW OF ACCEPTANCES OF CODEX STANDARDS AND MAXIMUM RESIDUE LIMITS FOR PESTICIDES BY COUNTRIES IN THE REGION / REPORT ON COMMISSION ACTIVITIES REGARDING THE PROMOTION OF ACCEPTANCE OF CODEX STANDARDS, MAXIMUM RESIDUE LIMITS AND THE CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD 11 - 40 INFORMATION AND MEMBER GOVERNMENT REPORTS ON FOOD CONTROL AND FOOD SAFETY ISSUES 41 - 69 REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (ACREEMENTS ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE) CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 1112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I REVISED AGENDA FOR THE SESSION 30 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX II PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND FROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES 13 - 20 MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM FAO, WHO AND OTHER INTERNATIONAL ORGANIZATIONS	
MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM FAO, WHO AND OTHER INTERNATIONAL ORGANIZATIONS REVIEW OF ACCEPTANCES OF CODEX STANDARDS AND MAXIMUM RESIDUE LIMITS FOR PESTICIDES BY COUNTRIES IN THE REGION / REPORT ON COMMISSION ACTIVITIES REGARDING THE PROMOTION OF ACCEPTANCE OF CODEX STANDARDS, MAXIMUM RESIDUE LIMITS AND THE CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD 31 - 40 INFORMATION AND MEMBER GOVERNMENT REPORTS ON FOOD CONTROL AND FOOD SAFETY ISSUES 41 - 69 REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (ACREEMENTS ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE) 70 - 75 CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION 70 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 107 - 108 Dried Anchovies 109 - 112 FISH Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION NATIONAL CODEX COMMITTEES IN THE REGION NATIONAL CODEX COMMITTEES IN THE REGION 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I REVISED AGENDA FOR THE SESSION 30 APPENDIX II REVISED AGENDA FOR THE SESSION 31 - 33 APPENDIX II PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
OTHER INTERNATIONAL ORGANIZATIONS	MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM FAO. WHO AND
REVIEW OF ACCEPTANCES OF CODEX STANDARDS AND MAXIMUM RESIDUE LIMITS FOR PESTICIDES BY COUNTRIES IN THE REGION / REPORT ON COMMISSION ACTIVITIES REGARDING THE PROMOTION OF ACCEPTANCE OF CODEX STANDARDS, MAXIMUM RESIDUE LIMITS AND THE CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD	OTHER INTERNATIONAL ORGANIZATIONS
PESTICIDES BY COUNTRIES IN THE REGION / REPORT ON COMMISSION ACTIVITIES REGARDING THE PROMOTION OF ACCEPTANCE OF CODEX STANDARDS, MAXIMUM RESIDUE LIMITS AND THE CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD 31 - 40 INFORMATION AND MEMBER GOVERNMENT REPORTS ON FOOD CONTROL AND FOOD SAFETY ISSUES 41 - 69 REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (AGREEMENTS ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE) 70 - 75 CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION 76 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) 94 - 98 LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 107 - 108 Dried Anchovies 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX II PROPOSED DRAFT STANDARD FOR THE TERM "HALAL" 31 - 33 APPENDIX II PROPOSED DRAFT STANDARD FOR THE TERM "HALAL" 31 - 33 APPENDIX II PROPOSED DRAFT STANDARD FOR THE TERM "HALAL" 31 - 33 APPENDIX II PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
REGARDING THE PROMOTION OF ACCEPTANCE OF CODEX STANDARDS, MAXIMUM RESIDUE LIMITS AND THE CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD 31 - 40 INFORMATION AND MEMBER GOVERNMENT REPORTS ON FOOD CONTROL AND FOOD SAFETY ISSUES	
RESIDUE LIMITS AND THE CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD INFORMATION AND MEMBER GOVERNMENT REPORTS ON FOOD CONTROL AND FOOD SAFETY ISSUES	
INFORMATION AND MEMBER GOVERNMENT REPORTS ON FOOD CONTROL AND FOOD SAFETY ISSUES REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (AGREEMENTS ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE) CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION 76 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) LABELLING OF FOODS WITH REGARD TO RELICIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR OTHER BUSINESS AND FUTURE WORK 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX II PROPOSED DRAFT STANDARD FOR DIRED ANCHOVIES 31 - 33 APPENDIX II PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND FRESHWATER FISH, CRUSTACEAN AND FRESHWATER FISH, CRUSTACEAN AND FRESHWATER FISH, CRUSTACEAN AND	
FOOD SAFETY ISSUES REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (AGREEMENTS ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE) 70 - 75 CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION 76 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) 94 - 98 LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX II REVISED AGENDA FOR THE SESSION 31 - 33 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 44 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 45 - 46 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 46 - 47 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 47 - 47 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 48 - 47 APPENDIX IV PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (AGREEMENTS ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE)	
APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE) . 70 - 75 CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION . 76 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) . 94 - 98 LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS . 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 . 105 - 106, 120 Canned Bamboo Shoots . 107 - 108 Dried Anchovies . 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish . 113 - 115 Pickles . 116 - 117 Chutney . 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION . 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA . 127 - 132 NOMINATION OF THE COORDINATOR . 133 - 134 OTHER BUSINESS AND FUTURE WORK . 135 - 140 DATE AND PLACE OF NEXT SESSION . 141 LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS . 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION . 30 APPENDIX III PROPOSED DRAFT STANDARD FOR DIED ANCHOVIES . 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES . 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES . 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES . 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES . 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES . 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES . 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (A CREEMENTS ON THE
TECHNICAL BARRIERS TO TRADE) 70 - 75 CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION 76 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) 94 - 98 LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX II PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33 APPENDIX II PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR PISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACCEAN AND	APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON
CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION 76 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) 94 - 98 LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX II LIST OF PARTICIPANTS 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX II PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33 APPENDIX II PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33 APPENDIX IV PROPOSED DRAFT STANDARD FOR PISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION 76 - 93 PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) 94 - 98 LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33 APPENDIX III PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	CONSIMER INVOLVEMENT IN DECISION MAKING IN RELATION TO ECOD STANDARDS
PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (AT STEP 4) 94 - 98 LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX IL REVISED AGENDA FOR THE SESSION 30 APPENDIX II PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR PISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS 99 - 104 CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 - 106, 120 Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION 121 - 122 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS 20 - 29 APPENDIX II PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33 APPENDIX III PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX IV PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4	I ARELLING OF FOODS WITH RECARD TO RELIGIOUS PROJUBENESTS
Canned Bamboo Shoots 107 - 108 Dried Anchovies 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish 113 - 115 Pickles 116 - 117 Chutney 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES APPENDIX I LIST OF PARTICIPANTS 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33 APPENDIX III PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX V PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 105 106 100 100
Dried Anchovies . 109 - 112 Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish . 113 - 115 Pickles . 116 - 117 Chutney . 118 - 119 ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION . 121 - 126 REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA . 127 - 132 NOMINATION OF THE COORDINATOR . 133 - 134 OTHER BUSINESS AND FUTURE WORK . 135 - 140 DATE AND PLACE OF NEXT SESSION . 141 LIST OF APPENDICES APPENDIX I LIST OF PARTICIPANTS . 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION . 30 APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" . 31 - 33 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES . 34 - 45 APPENDIX V PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	Canned Ramboo Shoots
Fish Crackers (Dried Keropok) from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish	
Molluscan Shellfish Pickles	
Pickles	Molluscan Shallfish
Chutney ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA NOMINATION OF THE COORDINATOR OTHER BUSINESS AND FUTURE WORK DATE AND PLACE OF NEXT SESSION LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS APPENDIX II REVISED AGENDA FOR THE SESSION APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES APPENDIX IV PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION	
NATIONAL CODEX COMMITTEES IN THE REGION	
REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA 127 - 132 NOMINATION OF THE COORDINATOR 133 - 134 OTHER BUSINESS AND FUTURE WORK 135 - 140 DATE AND PLACE OF NEXT SESSION 141 LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS 20 - 29 APPENDIX II REVISED AGENDA FOR THE SESSION 30 APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33 APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES 34 - 45 APPENDIX V PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
NOMINATION OF THE COORDINATOR OTHER BUSINESS AND FUTURE WORK DATE AND PLACE OF NEXT SESSION LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS APPENDIX II REVISED AGENDA FOR THE SESSION APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES APPENDIX V PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
OTHER BUSINESS AND FUTURE WORK	NEVENTALISM OF THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA
LIST OF APPENDICES LIST OF APPENDICES Pages APPENDIX I LIST OF PARTICIPANTS	NOMINATION OF THE COORDINATOR
APPENDIX I LIST OF PARTICIPANTS	OTHER BUSINESS AND FUTURE WORK
APPENDIX I LIST OF PARTICIPANTS	DATE AND PLACE OF NEXT SESSION
APPENDIX I LIST OF PARTICIPANTS	
APPENDIX I LIST OF PARTICIPANTS	
APPENDIX I LIST OF PARTICIPANTS	LICT OF ADDRANGED
APPENDIX I LIST OF PARTICIPANTS	LIST OF APPENDICES
APPENDIX I LIST OF PARTICIPANTS	Pages
APPENDIX II REVISED AGENDA FOR THE SESSION	
APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL"	
APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL"	APPENDIX II REVISED AGENDA FOR THE SESSION
APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES	APPENDIX III PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" 31 - 33
APPENDIX V PROPOSED DRAFT STANDARD FOR FISH CRACKER (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	APPENDIX IV PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES
FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND	
MOLLUSCAN SHELLFISH 46 - 55	MOLLUSCAN SHELLFISH

INTRODUCTION

- 1. The Ninth Session of the Codex Coordinating Committee for Asia was held in Beijing, the People's Republic of China from 24 to 27 May 1994 at the kind invitation of the Government of the People's Republic of China. The Session was attended by delegates from China, India, Indonesia, Japan, Republic of Korea, Lebanon, Malaysia, the Philippines, Singapore, Sri Lanka and Thailand as well as observers from Australia, AOAC International, the International Organization of Consumers Union (IOCU) and the World Association of Seaweed Processors (MARINALG International). In addition, the Chairman and a Vice-Chairman of the Codex Alimentarius Commission (CAC) were present. The list of participants, including members of the Secretariat, is attached to this report as Appendix I.
- 2. The Committee was chaired by Professor Dai Yin, Honorary Director of the Institute of Food Safety Control and Inspection, Ministry of Public Health as the Codex Coordinator for Asia. He welcomed delegates and observers to China and expressed his appreciation to everyone for their cooperation and support.

OPENING OF THE SESSION (Agenda Item 1)

- 3. At the Opening Ceremony, the two Minsters, Honourable Dr. Chen Minzhang, Minister of Public Health, and Professor Wan Baorui, Vice Minister of Agriculture, were present. The Session was formally opened by the Honourable Dr. Professor Chen Minzhang. In his opening address he welcomed all of the delegates and observers to China and expressed his pleasure that China was able to host this Session of the Codex Coordinating Committee for Asia. He further expressed his hope that this Session would result in strengthening of information exchange and coordination among all of the countries of the Region on activities related to the control of the quality and safety of food and that harmonization of food standards should become a reality.
- 4. He commented on the fact that the food industry in Asia was developing rapidly and therefore very high priorities should be placed by countries of the Region on regional cooperation in the area of food quality and safety, including the formulation and harmonization of food standards and codes of practice.
- 5. Dr. Tian Runzhi, Chief Administrator, State Administration of Import and Export Commodity Inspection of the People's Republic of China (SACI) welcomed the delegates and observers to Beijing and expressed warm congratulations for the convening of the Ninth Session of the CCASIA. He informed the Committee of the work being carried out by SACI related to the control of exported and imported food and concluded by wishing the Committee success in their deliberations over the next days.
- 6. Mr. Li Baoguo, Deputy Director, State Bureau of Technical Supervision, welcomed the delegates and observers to China and informed the Committee of the work that was being carried out in China related to the setting of standards. He wished the Session success in their work and looked forward to learning of the outcome of the meeting.
- 7. Dr. A.M. Qureshi, FAO Representative in China thanked the Government of China for its outstanding cooperation, efforts and contributions towards convening this 9th Session of the CCASIA, which was the first meeting ever of a Codex Committee to be held in China. He welcomed the delegates and observers on behalf of the Director-General of FAO and informed them of the importance which FAO placed on the work of the CAC. He advised the Committee on the activities that were being carried out as a follow-up to the International Conference on Nutrition (ICN), especially those related to the quality and safety of food. He further advised on the new importance given to the work of the CAC, especially in view of the recently agreed GATT Agreement on the Application of Sanitary and Phytosanitary Measures (SPS) and the revised Agreement on Technical Barriers to Trade (TBT). He also indicated some of the very important work recently carried out by the Government of China in response to their National Plan of Action of the ICN.

- 8. Dr. A. Basaran, Regional Adviser, WHO Regional Office for the Western Pacific, welcomed the Committee on behalf of the Director-General of WHO, as well as on behalf of the three Regional Directors of WHO responsible for activities within the various countries of Asia. He informed the Committee of the importance of the CAC from the public health point of view, and of the work being carried out by the countries of the Region to improve the quality and safety of foods. He also informed the Committee that in spite of the good work that was already being carried out by the countries of the region that there remained much more work to be undertaken; and that possibly some countries needed to increase the priority which they placed upon strengthening food quality and safety matters, including their commitment to this effort.
- 9. Mr. R.J. Dawson, Chief, Joint FAO/WHO Food Standards Programme, and Secretary, CAC, welcomed the delegates and highlighted the historic aspect of convening this Session in China. He informed the Committee of the implications of the recently concurred GATT Agreements on SPS and TBT and the fact that the CAC was specifically identified as the competent authority on food standards in the SPS Agreement; that CAC was the only inter-governmental body responsible for the elaboration of food standards; and that the membership of the CAC currently stood at 147 member countries which covered some 97% of the world's population. He informed the Session that he looked forward to the continued good efforts of the countries of the Region in strengthening their national systems of food control.
- 10. Professor F. G. Winarno, Chairman of the Codex Alimentarius Commission, addressed the Committee and informed it of the activities and outputs of the CAC which benefited Codex member countries. He highlighted the importance of export from the countries of Asia which was growing rapidly. He wished the Committee success in its deliberations and looked forward to the continued good relationship with the Committee.

ADOPTION OF THE AGENDA (Agenda Item 2)

11. After discussion, the Committee adopted the Provisional Agenda, as contained in CX/ASIA 94/1 and 94/1-Add.1, with the amendment that Agenda Item 6 and 7 be discussed together. The adopted agenda is attached as Appendix II.

ELECTION OF VICE-CHAIRMAN (Agenda Item 3)

12. The Delegation of Indonesia, seconded by the Delegation of Thailand, nominated Dr. Yuzo Hayashi of Japan as vice-chairman. The Committee unanimously concurred with the proposal.

MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES (Agenda Item 4)

- 13. The Secretariat introduced document CX/ASIA 94/2 which summarized matters of interest to the Committee arising from the 20th Session of the Codex Alimentarius Commission and the Codex Committees held after the CAC, namely, the 14th Session of the Codex Committee on Fats and Oils, the 2nd Session of the Codex Committee on Food Import and Export Certification and Inspection Systems and the 26th Session of the Codex Committee on Food Additives and Contaminants.
- 14. The Committee noted that the 20th Session of the CAC had reiterated that Codex standards should retain only those provisions which appeared essential and were used by governments as regulatory control measures as regarded health, safety and consumer protection concerns. It was also noted that the 20th CAC had adopted Draft General Provisions Relating to Food Hygiene in Codex Standards at Step 8 as recommended by the Codex Committee on Food Hygiene for inclusion in Codex standards whenever possible.
- 15. The Committee further noted that the 26th CCFAC had agreed to maintain the Draft Maximum Level for Aflatoxin M_1 in Milk of 0.05 μ g/kg at Step 7 and had decided to discontinue the elaboration of the Guideline Level for Aflatoxin B_1 in Supplementary Feedingstuffs for Milk-Producing Animals.

- 16. The Delegation of Malaysia requested the Secretariat to clarify the discrepancy between the draft and final reports of the 26th CCFAC concerning Draft Maximum Level for Aflatoxin M₁ in Milk: it had been stated as at Step 6 in the draft report while at Step 7 in the final report.
- 17. The Committee was also provided with an oral report on matters of interest arising from the Codex Committees held after the distribution of the document, which included the following issues.

Codex Committee on Pesticide Residues (CCPR)

18. The 26th CCPR had agreed that the Questionnaire on major pesticides used in developing countries and pesticide/commodity combinations should be revised and circulated for information and comments for the next session.

Codex Committee on General Principles (CCGP)

19. The 11th CCGP had recommended the amendments to the Rules of Procedure to provide that one-third of the Members of the Commission would constitute the necessary quorum to make recommendations to amendment of the Statutes and Rules of Procedure. It had agreed to revise the appropriate sections of the *Procedural Manual* accordingly for consideration by the 21st CAC.

Codex Committee on Fish and Fishery Products (CCFFP)

20. The 21st CCFFP had advanced 14 Draft Standards for canned products, quick frozen products and dried and salted products to Step 8. It had agreed to discontinue work on the utilization of shark.

MATTERS OF INTEREST TO THE COMMITTEE ARISING FROM FAO, WHO AND OTHER INTERNATIONAL ORGANIZATIONS (Agenda Item 5)

21. The Committee had before it document CX/ASIA 94/3 concerning this work. The Committee was informed regarding Joint FAO/WHO activities being carried out that were of interest to the Region.

Joint FAO/WHO Activities

- 22. The Committee was informed of the follow-up activities being carried out in response to the Joint FAO/WHO International Conference on Nutrition held in Rome in 1992. The need for concerted country action related to food quality and safety was highlighted.
- 23. The Committee was advised regarding the work being carried out by the Joint FAO/WHO Committee on Food Additives (JECFA), the Joint FAO/WHO Meeting on Pesticide Residues (JMPR), the Joint FAO/UNEP/WHO Food Contamination Monitoring Programme and the FAO/WHO/IAEA International Consultation Group on Food Irradiation (ICGFI).

FAO Activities

The FAO Representative advised the Committee regarding the work being carried out by FAO that was complementary to the work of the CAC and of interest to the Committee. The Committee noted that FAO was providing technical assistance to several countries of the Region to strengthen their national programmes of food control. In addition, the Committee was informed that as a result of the recently concluded GATT negotiations and the Agreements on SPS and TBT, FAO had formed a new Food Quality Liaison Group to provide liaison between GATT (WTO), FAO, CAC and JECFA. Assistance to countries was continuing related to the improvement of quality and safety of street foods. A recently published FAO Manual of Food Control, *Imported Food Inspection* (14/15) had been dispatched to all Codex Contact Points in February, 1994. Two important Expert Consultations had been held-"Sampling Plans For Aflatoxin in Peanuts and Corn" and "Integration of Consumer Interests in Food Control" - and the reports had been published and distributed. An Asian Regional Network for the Control of Mycotoxin (FAO/UNEP) has been established to provide training to food control personnel

from the Region on aspects related to methodology, sampling techniques and extension work. A directory of institutions in Asia involved in mycotoxin control and prevention was under preparation and should be distributed in late 1994.

WHO Activities

- 25. The food safety activities of WHO at the global and inter-regional levels were summarized by the WHO Representative. These activities included numerous workshops and consultations held on several topics related to food safety such as Foodborne Trematode Infections, Health Aspects of Marker Genes in Genetically Modified Plants, Update of Food Irradiation, Hazard Analysis Critical Control Point (HACCP) Training, Prevention of Salmonellosis, Cholera Control, and Prevention of Foodborne Hepatitis A: Consideration on the Vaccination of Food Handlers. In addition, the Committee was informed of the technical assistance which was being provided to several countries of the Region by the various WHO Regional Offices. These activities included several national workshops on HACCP techniques, assessment of environmental and industrial contaminants in food and how to manage such risks, and also assistance to countries of the Region to improve the safety of street foods. Countries of the Region were requested to ensure that food safety continued to be a high priority and that the commitment to ensure food quality and safety be strengthened so as to improve consumer protection.
- 26. The Committee took note of the information provided and the fact that both FAO and WHO were providing substantial support to the countries of the Region. The Committee expressed its appreciation to both FAO and WHO for the excellent work being carried out. However, in view of the tremendous increase in food exports from the region and the very large population within the Region, the Committee requested that both FAO and WHO give consideration to providing additional assistance as possible to help improve the control of food quality and safety within the Region.

AOAC International

- 27. The Observer from AOAC International expressed his appreciation to the Committee for being able to inform the meeting of the activities of AOAC International. He advised the Committee that AOAC is an organization of scientists founded for the purpose of validation testing of analytical methods of analysis.
- 28. AOAC worked especially with the Codex Committee on Methods of Analysis and Sampling to report on the validation and reliability of methods referred to in Codex standards.
- 29. Because of the increased movement of foods in international trade there was a like need for reliable methods of analysis. AOAC invited member government scientists to participate in the important work of AOAC related to the performance testing of methods of analysis.
- 30. The Committee noted the new developments within AOAC such as peer-verified methods programme and the test kit performance testing programme. Peer-verified methods programme involved in-house validation followed by validation in at least on other laboratory. The performance testing of rapid analysis kits would be performed at the AOAC Research Institute.

REVIEW OF ACCEPTANCES OF CODEX STANDARDS AND MAXIMUM RESIDUE LIMITS FOR PESTICIDES BY COUNTRIES IN THE REGION (Agenda Item 6) REPORT ON COMMISSION ACTIVITIES REGARDING THE PROMOTION OF ACCEPTANCE OF CODEX STANDARDS, MAXIMUM RESIDUE LIMITS AND THE CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD (Agenda Item 7)

31. The Committee had before it document CX/ASIA 94/4, containing a summary of matters of interest concerning acceptances and a review of acceptances of Codex Standards and Codex Maximum Residue Limits (MRLs) for Pesticides by countries in the Region, and 94/5, containing a report regarding the promotion of acceptances of Codex standards, Maximum Residue Limits and the Code of Ethics for International Trade in Food.

- 32. The Committee was informed that the 20th Session of the CAC had adopted the amendments to the General Principles of the Codex to delete "target acceptance" and to include "free distribution". The 20th CAC had noted that acceptance procedure might need to be reviewed after the completion of the Uruguay Round. It had also noted the necessity of reviewing the current standards and related texts to ensure their relevance in relation to present scientific knowledge and international trade.
- 33. It was noted that since the last Session of the Committee, no countries in the Region of Asia had notified acceptances of Codex Standards or Codex MRLs for Pesticides. The Committee noted that the Agreement on the Application of Sanitary and Phytosanitary Measures encouraged countries to use Codex Standards, including Codex MRLs. The Secretariat informed the Committee that Volume 3 of Codex Alimentarius in 3 languages, containing MRLs for Residues of Veterinary Drugs, would be sent for the governments for consideration of acceptance.
- 34. It was reported that the 39th Executive Committee reviewed an analysis of responses made by governments to the Code of Ethics for International Trade in Food and considered two proposals: The 39th Executive Committee had not supported the first proposal to include a prior informed consent clause but had welcomed the second proposal to extend the application of the Code so it could be adhered to by private commercial producers and exporters.

Reports by Countries

- 35. The Committee was informed that recently Thailand had accepted 3 Codex Standards, namely, Codex General Standards for Vegetable Protein Products and for Soy Protein Products and Codex Standard for Wheat Gluten in the form of "free distribution". Thailand had always been using Codex Standards and Codex Codes of Practice as points of reference for setting up national food laws and food standards for industries. Almost all of large scale food industries in Thailand conformed to those Codex Standards and Codes. The implementation of Codex Codes of Practice was intended to emphasize on small and medium scale industries by sending staff to advise on hygienic practices and hazard analysis critical control point procedures together with quality management system to up-grade food processing methods and quality control.
- 36. The Delegation of Thailand also stated that when elaborating MRLs for Pesticides, residue data based on Good Agricultural Practices (GAPs) in tropical region should also be taken into consideration. At the moment, Thailand could provide only limited residue data to the JMPR indicating that pest control requirements under tropical climatic condition were different from those under temperate zone. Therefore, in order to carry out studies to generate residue data, technical and financial assistance would be very helpful and should be sought from outside of the Region.
- 37. The Delegation of Japan reported that although the country had not accepted Codex MRLs for Pesticides, about 90 % of the Codex MRLs were the same as or stricter than Japanese corresponding MRLs or not yet established in Japan.
- 38. The Delegation of China indicated that they had accepted 28 Codex MRLs for Pesticides. The Delegation stated that governments should use Codex MRLs as references to national MRLs as stated in the SPS Agreement for both health protection and facilitation of international trade. It was also stated that for inspection, samples should be taken from the edible portion of commodities.
- 39. The Delegation of Sri Lanka reported that the country was in the process of adopting the national standards on "Limits for Pesticide Residues in Food" as its legal standards. In the preparation of the standard, assistance was obtained from the CAC and countries such as Australia, Malaysia and India. The limits given were consistent with GAPs and ensured that pesticide residues were kept at the minimum level. The standard permitted 73 different pesticide residues in foods such as fruits, vegetables, milk and milk products, rice, cereals, fish, etc., many of which were common to the Codex MRLs for Pesticides.
- 40. The Delegation of Korea reported that they were currently considering the adoption of the Guidelines for the Application of the Hazard Analysis Critical Control Point System. It was also reported

that a National Codex Committee was being developed and, after its establishment, it was expected that the Republic of Korea would accept Codex Standards, including MRLs, and Codes of Practice.

INFORMATION AND MEMBER GOVERNMENT REPORTS ON FOOD CONTROL AND FOOD SAFETY ISSUES (Agenda Item 8)

41. All participating countries in the Region gave reports on their food control and food safety issues at national level.

China

- 42. The main functions of the Chinese Commodity Inspection Bureau (CCIB) in enforcing sanitary supervision and inspection of food for export are: to enforce sanitary supervision and inspection on processing factories, slaughter houses, cold storage and storehouses of food for export (hereinafter referred to as the factories/storehouses of food for export); to formulate and promulgate standards and relevant provisions for inspection on quality of food for export and to supervise their implementation; and to administer in a unified way the registration of the factories/storehouses of food of export.
- 43. The State Administration of Import and Export Commodity Inspection pays close attention to strengthening follow-up supervision over registered factories/storehouses of food for export. If registered factories/storehouses are found failing to meet sanitary requirements, CCIB gives warning or order to make improvement within a limited period of time or revoke the registration certificates respectively depending on the seriousness of the case. If any factories/storehouses which have been registered in importing countries are found not in conformity with the sanitary requirements, they shall be ordered to stop exporting food to such importing countries. They can resume export only when they are proved to have met the sanitary provisions and requirements through improvement.
- 44. "Provisional Law of the People's Republic of China on Food Hygiene" was adopted in 1982 by the Standing Committee on the 5th National Congress and entered into force on July 1, 1983. Hygienic regulations and rules for various foods have been promulgated. 1477 food hygienic standards, including standardized analytical methods, hygienic standards for the safe use of pesticides have been adopted. In recent years, GMP and HACCP techniques have been utilized in soft drink, meat and meat products, and milk and milk products industries. Since China became a Codex member state in 1985, much progress has been made and support from Codex is recognized. A pilot study on street foods in 5 cities in China has been conducted under the support by FAO.

<u>India</u>

45. India is implementing food control and safety programme under the Prevention of Food Adulteration Act. This is being implemented by Food Health Authorities of the state country. Food specifications and rules have been laid down. There are 78 public analysis laboratories and four central food laboratories.

<u>Indonesia</u>

- 46. Since the enactment of the Foreign and Domestic Investment Act in 1975, the development of food industry and food processing plants has brought about significant progress. There are also traditional food processing units, mostly operated as a small household industry. There are some problems associated with quality and food safety issues for this operation. However, the Government of Indonesia has been actively involved in providing supervision and guidance to enable these industries to strive and develop good quality traditional food by development and introducing Codes of Practice including good sanitation practices in processing unit and food establishments.
- 47. Law on Health No. 23/1992 clearly stipulates special regulation for food safety. Regulations on food safety will be further defined through enactment of Food Safety Regulation which is expected to be issued in 1994. Based on this new regulation, all regulations related to food safety issued by the Minister

of Health decree including food additives, labelling, microbial and chemical contaminants in food will be revised. The State Ministry of Food Affairs is currently preparing food law which is expected to be enacted in the next two years. As a supplement to the above regulations, several guidelines on food processing have been adopted using the Codex Codes of Practice including guidelines on food, fish, fruit and vegetables as well as low acid canned food.

<u>Japan</u>

- 48. A new optional import inspection procedure, "Pre-certification System for Imported Products Conducted with the Food Sanitation Law", has been established this year. The purpose of this system is to simplify and speed up food import procedures by confirming and registering the products intended for import into Japan from foreign countries. This programme will reduce the cost of distribution. But this system is only optional import procedure, and does not in any way preclude the import products into Japan which bear no confirmation/registration under this system. It does not mean to delete the current system.
- 49. The other new programme is "the Revision of Date Labelling on Foods". In Japan, the date labelling currently required under the Food Sanitation Law is the date of manufacture. It will be substituted for labelling either "Use by Date" or "Date of Minimum Durability". On 10 May 1994, Japan informed the Embassy members in Tokyo of this matter. Now Japan is waiting for government comments. In near future, Japan will notify governments of this matter through GATT.

Republic of Korea

- 50. There are two control systems for foods in Korea. One is the system ruled by Food Hygiene Act announced in 1962, and the other is ruled by Industrial Standardization Act announced in 1961. The Food Hygiene Act is aimed for prevention of sanitary hazard and improvement of food nutrition that results in promotion of public health. The Food Hygiene Act is compulsory requirements applied to all persons producing or selling foods for domestic consumption. It covers activities related to preparation, processing, packaging, labelling and marketing of food commodities. The primary object of this Act is the control of food quality and safety.
- 51. Industrial Standardization Act aims for development and dissemination of reasonable industrial standards, which result in justification and simplification of trade and in reasonable consumption through improvement of quality and productivity, technology and related services.
- 52. The Government also operates a national quality certification system, called "the KS-mark for Processed Food Commodities" to improve food quality and to justify food processing and marketing system. This certification system is operated on an optional basis and open to all manufacturers, domestic or abroad, who want to use the KS-mark on their products. There are no restrictions if the KS-mark is not used on products for producing and marketing as long as the requirements of the Food Hygiene Act are met.
- 53. It is expected that opening of the domestic food market will be accelerated by the accession of GATT Uruguay Round in 1994. Therefore, all food commodities imported should meet the requirements of quality and safety regulated by the Food Hygiene Act.

<u>Lebanon</u>

54. Lebanon has not yet prepared its rules, regulations and standards regarding quality and safety of food. Lebanon being a member of FAO and WHO has recently decided through an inter-institutional committee to use the Standards and Codes of Practice of the Codex Alimentarius. However, those standards concerning Lebanese traditional food have not yet been elaborated. The Government of Lebanon appreciates the assistance provided by FAO and WHO in helping to implement proper food analysis and inspection and programmes on consumer education. Lebanon is currently importing 80% of its food needs. The implementation of control programmes is being strengthened at different levels

within the country. At the food distribution level much effort has been made to improve the situation. In addition, a general food law is now being prepared and recommended methods of analysis are being applied.

<u>Malaysia</u>

- Malaysia is giving very high priority to controlling and promoting food hygiene and sanitation in its food control programmes. A nationwide Food Hygiene Campaign was launched in 1993 to inculcate good personal hygiene, proper food handling and food storage practices among food handlers and promotion of healthy lifestyle and proper selection of hygienic food by the consumers. The use of HACCP is being encouraged in the food industry where regular training are being conducted to promote its practice. The principles of HACCP are also being incorporated in the country's Low Acid Canned Foods Course recognized by the USFDA as one of the its Better Process Control Schools. In addition, special programmes such as the Small Industry Guidance Services are established to provide comprehensive technical guidance to small scale food industries to achieve acceptable food safety and quality.
- 56. Food standards development is being actively undertaken to meet the demands of the food industries and the increased consumer awareness. For example, the MRLs for pesticide in Malaysia had been reviewed in line with Codex MRLs. In support of the food control programme analytical services will be further strengthened with the completion of a Central Public Health Laboratory and two additional regional laboratories by 1996. To steer its rapid economic development, Malaysia is giving a higher commitment to research under the Intensification of Research in Priority Areas (IRPA) projects. Current concerns of research in food safety include evaluation of contaminants in food, impact of pollutants in food in relation to human health, allergens in local food and operational effectiveness of food control programmes. Following the signing of the World Declaration for Nutrition, the Malaysian National Coordinating Committee for Food and Nutrition was established to expedite the development of a national nutrition policy.
- 57. Malaysia would continue to support the activities on food safety and appreciate the various support given by FAO/WHO and would be very pleased to be associated with the these organizations including the work of the Codex Alimentarius Commission.

The Philippines

- 58. The recent activities of the Government of the Philippines with regard to food control and food safety issues focused on the evaluation and possible amendment of existing food standards and regulations. In this regard, several technical committees have been constituted with representatives from the food industry, the academe and government agencies. Much progress has been made by some committees such as the Food Additives Review Panel which has almost completed its task of updating the positive list of food additives. New standards have also been developed including that on bottled water.
- 59. The Philippine Government has given much importance to training as a mechanism for improving food safety. Training of food inspectors on HACCP has been initiated and more training activities on HACCP are being planned in cooperation with the food industry and academic institutions.
- 60. The Philippine Food and Nutrition Research Institute has recently completed an FAO-assisted project on Improvement of Street Food Safety and Quality in Selected Schools. The project proponents are now soliciting support from local government health units and school authorities to implement training modules and promote food safety awareness among street food vendors.
- 61. With regard to mycotoxin prevention and control, a national network for this purpose has been put in place.
- 62. As a result of the International Conference on Nutrition in 1992, the Philippines has formulated a Plan of Action for Nutrition which entails the implementation of five programmes: (a) micronutrient

supplementation and food fortification; (b) home and community food production; (c) credit assistance for livelihood; (d) nutrition education; and (e) food assistance.

<u>Singapore</u>

- 63. Singapore continues to strengthen its food control programmes through updating the food laws and fine tuning the food safety programmes. Existing factories are encouraged to upgrade their hygiene standards and to automate, if they are not already automated. More and more factories have embraced ISO 9000 and HACCP. Applications for the setting up of new food factories are favourably considered if they are to be automated and have public health infrastructures in place.
- 64. The government has regular surveillance and monitoring programmes covering all retail food, locally manufactured and imported food. All food handlers are undergoing a basic public health course on food safety. Cooked food vendors are subjected to a demerit point system of inspection. The state of food safety has improved progressively over the years. Violative food are less frequently encountered, given the same level of surveillance. More and more traders are voluntarily complying with the requirements of law and food safety. The government is encouraging this healthy trend through consultation, seminars and education.

Sri Lanka

- 65. Food policy is part of the health policy which aims at providing "Health for All by the Year 2000". The Government is committed to the development of agriculture and food and promoting export. The country has drawn up a national work plan for food safety.
- 66. The Government of Sri Lanka wishes to thank the FAO/WHO/UNDP on their support in the establishment of an effective food control programme. However, there still exist some issues which require further support from the FAO/WHO as follows: strengthening of Food Inspectorate in number and providing transport facilities for routine functions; monitoring food handling establishments and taking effective remedial action; providing training facilities for laboratory staff involved in food control sources; assisting in the Laboratory Quality Assurance Programmes and inter-laboratory correlation systems which are currently not being conducted; assisting in sanitation monitoring programmes; and developing a management information system.

Thailand

- 67. The Thai Government has created various activities on health aspect of food safety and food control in all areas. Various government agencies have been assigned to ensure that health of the population is well taken care of, emphasizing not only for local consumption but also for the export, particularly microbiological and chemical contamination.
- 68. For export, several strategies have been proposed such as GMP, HACCP and quality assurance system and quality management approaches, particularly ISO 9000, have been implemented for private enterprise throughout the country by certification and training processors, inspectors and auditor. Thailand also educates consumers on the aspects of food safety and nutrition through the mass media, symposia, seminars and primary health care programmes.
- 69. The Committee noted that the Second Asian Conference on Food Safety would be held in Bangkok from 18-23 September 1994.

REPORT ON THE OUTCOME OF THE GATT URUGUAY ROUND (AGREEMENTS ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES AND ON TECHNICAL BARRIERS TO TRADE)(Agenda Item 9)

- 70. The Committee had before it document CX/ASIA 94/6 which provided a short summary regarding the status of the GATT/Uruguay Round of Multilateral Trade Negotiations, as related to the Sanitary and Phytosanitary Measures Agreement.
- 71. The Secretariat informed the Committee that the various GATT Agreements had been officially agreed to in a recent GATT meeting held in April 1994 in Morocco. Two of the agreements were of specific interest to Codex work the Agreement on the Application of Sanitary Phytosanitary Measures (SPS) and the revised Agreement on Technical Barriers to Trade (TBT). A copy of the final SPS Agreement and the TBT Agreement (CL 1994/3-GEN) had been sent to each of the Codex Contact Points for information purposes.
- 72. The Committee was informed of the actions being taken by CAC to meet the demands of the two agreements including the establishment of a uniform accelerated procedure for the elaboration of standards, the utilization of risk assessment and risk management in elaborating standards and the review of all standards that had been elaborated to date so as to ensure that only those provisions which appeared essential were maintained and that the latest scientific information was incorporated. In addition, the Committee was advised that several contacts had been made between the Codex Secretariat and the GATT Secretariat so as to assure proper collaboration and cooperation. It was also pointed out that both FAO and WHO had already had contact with GATT to provide for increased coordination.
- 73. The WHO Representative informed the Committee that the WHO World Health Assembly (WHA, May 1994) had again been informed on the need for increased action by countries to strengthen their food control activities in response to the SPS Agreement. It was reported that as a result of the discussions a Resolution had been agreed to by the WHA related to this topic although it was not yet available for review by the Committee.
- 74. The WHO Representative also informed the Committee that WHO had recently distributed a Director-General's circular letter (C.C. 8.1994) to all WHO member countries, which highlighted the importance of the SPS and TBT Agreements having a direct impact on health issues. It was stated in the circular letter that the basic provisions of the SPS Agreement are that any measures which may affect international trade must not be stricter than necessary for the protection of human, animal or plant health, must be based on scientific principles, and must not be maintained without sufficient scientific evidence.
- 75. The Committee welcomed the report on the final outcome of the GATT negotiations and noted that the GATT Agreements on SPS and TBT were extremely important to the countries of the Region; that much remained to be done to improve the quality and safety of foods produced and sold within the Region; and that there was a continued need for technical assistance to be provided by the international agencies such as FAO and WHO. Some delegations reported on the actions being taken at the national level including the review of national standards and codes of practice. It was agreed that this item should be retained on the Agenda for further updating at the next session of the Committee.

CONSUMER INVOLVEMENT IN DECISION-MAKING IN RELATION TO FOOD STANDARDS AND THE JOINT FAO/WHO FOOD STANDARDS PROGRAMME IN THE REGION (Agenda Item 10)

- 76. The Committee had before it CX/ASIA 94/7, containing an extract from ALINORM 93/40 concerning this matter, ALINORM 93/10, which had been considered at the 20th CAC, and the final report of the Expert Consultation on Integration of Consumer Interest in Food Control.
- 77. The Committee recalled the recommendations of the FAO/WHO Conference on Food Standards, Chemicals in Food and Food Trade (1991), as endorsed by the 19th Session of the CAC, for the

improvement of consumer participation in the work of Codex. It had been agreed that the International Organization of Consumers Union (IOCU) would prepare a discussion paper concerning this issue.

- 78. The Committee noted that the 20th CAC had considered this matter extensively. It had been pointed out that as regards funding for the participation of consumer representatives to Codex Committees, according to Rules of Codex Alimentarius Commission, the costs of attendance must be borne by the individual countries. It had been also agreed that the inter-governmental character of the Executive Committee be maintained and its current efficiency preserved. Therefore, the attendance of consumer representative would not be permitted.
- 79. The CAC had agreed on the necessity to continue working in close cooperation with consumer organizations, as might be required, and recognizing that consumer participation should be addressed at the national level, had invited governments to involve consumers more effectively in the decision-making process. The CAC had also agreed to have this matter discussed by Coordinating Committees, especially as the situation varied greatly from one region to another.
- 80. At the request of the Chairman, the Observer from IOCU introduced document ALINORM 93/10 and summarized their position as follows:
 - 1. Consumer Representation at the National Level
 - a) For countries without a developed consumer movement, governments should support the increase in consumer awareness of food quality and safety matters including the work of the Codex Alimentarius Commission by giving information via the media, existing relevant organizations and other appropriate forum and by encouraging consumer participation in decision making.
 - b) For countries with a developed consumer movement, governments should set up regular consultative procedures in which the views of consumers are given equal consideration to those of producers, industry and trade.
 - 2. Consumer Representation at the International Level
 - a) IOCU does not have a special budget for Codex representation. It depends on the willingness of its member organizations to pay for travel cost and staff time. Governments should try to bring consumer representatives to Codex meetings as part of the official delegation, if possible.
 - b) Procedures relating to the selection of experts to the Codex Committee should be reviewed. There is reservation that expert members tend to come from a limited number of countries and do not usually represent the full range of expert perspectives and opinions. IOCU suggests that it would be useful if a register could be set up listing the financial and commercial interest of all experts, international observers and participants of national delegates who do not belong to the Government. IOCU suggests that it be allowed to participate in the Executive Committee discussions as an observer.
- 81. Singapore informed the Committee that government food control agencies are themselves also consumer protection agencies except that they have the backing of law for enforcement. As governments represent the interest of their population and therefore of consumers, it is difficult to reconcile the representation of consumer groups at international forum together with governmental representation. It was the view of Singapore delegation that consumer interests should be incorporated at the national level. consumer groups should push for, and government should encourage, the participation of consumer groups in the decision making process on food safety, at the national level.

Reports by Countries

- 82. Government of India had enacted the Consumer Protection Act in 1986 to protect the interest of consumers. There were provisions for establishment of National Council for Consumer Protection and State Council for consumer Protection and both these councils were in active operation. There were 700 consumer organizations registered. The Consumer Protection Act was being regulated by the Ministry of Civil Supplies, Consumer Affairs and Public Distribution. For food safety five members of the consumer organizations were members of the Central Committee for Food Standards (CCFS) of Prevention of Food Adulteration Act, 1954, under the Ministry of Health and Family Welfare, wherein the Director General of Health Services was the chairman of this committee. There were several subcommittees of CCFS to discuss the various aspects of food articles, safety and hygiene. The consumer organizations took active part in food control and safety programmes. The consumer disputes were settled at district/state/national level by the courts set up under the Consumer Protection Act. Under the Prevention of the Food Adulteration Act the consumer organizations were being trained how to draw food samples and do needful for adulterated/misbranded food samples. But they had to follow the same procedure as that of food inspectors.
- National Council for Standardization. The council was comprised of representatives from government institutions, producers, consumers, various associations, researchers as well as NGOs, especially the Indonesian Consumer's Foundation (YLKI). This foundation was one of the members of the Codex Working Group in the National Council for Standardization. Development of the national standard for food was based on national consensus of the above representatives. As a member of the Codex Working Group, the YLKI was actively involved in decision making in relation to food standard implementation and Joint FAO/WHO Food Standards Programmes, including preparation of materials for the 9th Session of the CCASIA.
- 84. The Delegation of China informed the Committee that the Chinese Consumer Association had been found in 1984; a national network of consumer organizations had been formed; and "the Law on the Protection on Consumer's rights" had been adopted on 31 October 1993 and promulgated in 1 January 1994. Since then, the Chinese consumers had had more opportunities to protect their own rights. Currently in the field of food safety, they were actively involved in the movement of striking fraud and adulteration of foods and other products and lodged complaints through consumer organizations.
- 85. The Delegation of the Philippines reported that in 1992, the Philippine Congress had passed the Consumers Act of the Philippines. This Act provided for the creation of a Consumer Affairs Council which had been made operational this year. Although consumer groups had been involved in the past through public fora, this council would institutionalize the participation of consumers in decision-making in relation to food standards.
- 86. The Delegation of Malaysia reported that consumers were being represented in the various committees and task forces set up by the ministries and government departments in Malaysia. In the Ministry of Domestic Trade and Consumer Affairs, consumers were represented in the National Advisory Council for Consumer Protection through their associations, i.e., the Federation of Malaysian Consumer Association (FOMCA). In addition, the consumer through FOMCA was a member of the Malaysian Standards Council responsible for the development of national standards including those for foods. Realizing the importance of consumer participation and representation, the National Codex Committee of Malaysia was taking necessary steps to include consumer association as a member of the Committee.
- 87. Thailand stated that Office of Consumer Protection Board, which was appointed by the Cabinet to be one of the members of the National Codex Alimentarius Committee, was involved in decision making in relation to food standard. Representatives of consumer organizations were always invited as part of the country's delegation to participate in all Codex Committee sessions.
- 88. The Delegation of Sri Lanka reported that consumers were directly involved in the formulation of legal and national standards for food. The Food Advisory Committee which was the supreme body

for fixing legal standards had several government and non-government members. In addition, the committee could consist of 1) two members representing the commercial interests and the other industrial interests; and 2) two members to represent the consumer's interest. There were several consumer associations in Sri Lanka. They were very active and referred to their problems through the mass media. The Sri Lanka Standards Institute had set up a "Consumer Affairs Advisory Committee" for the benefit of the consumers and advised the Institute to frame standards when the consumers requested for it. Above all, there was a Consumer Protection Act (1979) similar to the one referred to by the delegate from India. It provided for a "Consumer Redress Committee" which looked after the consumer rights at the state, district and village levels. In short, consumers had a big role to play in decision making in relation to food standards.

- 89. The Observer from Australia informed that Australia had a policy of involving consumer representatives and other NGOs in the Codex programme since the Codex Alimentarius Commission had been established. Consumers had the opportunity to participate in all Codex activities through input to the development of Australia's position on working documents and by attending meetings as part of the Australian delegation. However, financial resource of this involvement continued to be an issue for consumer organizations.
- 90. The Delegation of Korea reported that national Codex work had been mainly supervised by the Ministry of Public Health and Society and the Ministry of Agriculture, Forestry and Fisheries. Consumer involvement in the national Codex work was not so active in Korea. There were about 10 non-governmental consumer organizations in the country and one governmental consumer organization, Korea Consumer Protection Board under umbrella of the National Economic Planning Board in Korea. All of them were insufficient in available resources to cover all consumers' issues. Some were partially concerned with the national Codex work. The Government agreed to the CAC's proposal to promote consumer involvement in the national Codex work, but it had not yet established how to promote it. It would be specified by the National Codex Alimentarius Committee which was to be established in a few years. At the time, for development or amendment of the national food standards, codes and acts, the Government would accept opinions of interested parties including consumers organizations.
- 91. The Delegation of Malaysia highlighted the work of the FAO Expert Consultation on Integration of Consumer Interests in Food Control held in Rome from 14 to 18 June 1993. The main objectives of the Consultation had been to assess the current status of integration of consumer interests in food control activities, to identify common issues of concern to consumers in food quality and safety, and to determine the current needs in consumer education and information. The Consultation had been attended by 13 experts from consumer groups, the food industry, and developed and developing countries. Among other matters the Consultation had strongly supported the universal adoption of the rights of consumers as recommended by the United Nations' General Assembly Resolution 39/248 of 9 April 1985.
- 92. The Consultation had recommended that consumer participation and representation in determination of matters of policy on food standards and food safety be recognized. Governments had been encouraged to review their food control laws to incorporate consumer concerns and interests. In addition, the food industries had been reminded of their role in strengthening its in-process quality assurance, labelling of food and other practices to ensure consumer safety. The Delegation of Malaysia reminded the Committee on the report of the Consultation that was made available to the members of the Committee for their reference to further details on the work of the Consultation.
- 93. The Committee supported the further involvement of consumers in Codex work.

PROPOSED DRAFT CODE OF PRACTICE FOR STREET FOODS (at Step 4) (Agenda Item 11)

94. The Committee had for its consideration document CX/ASIA 94/8 which outlined the background and the current status of the Proposed Draft Regional Code of Practice for Street Foods. The Secretariat informed the Committee of the Regional Codes of Practice for Street Foods being elaborated by other Coordinating Committees.

- 95. The Committee was informed that the 26th Session of the Codex Committee on Food Hygiene had considered draft proposals submitted by Africa, Asia and Latin America and the Caribbean and had decided that a general or global code was inappropriate, as could be regional codes. The CCFH had further recommended that the various Regional Codex Committees reconsider their approach to determine whether regional codes were actually needed. In addition, it had also been suggested that the regional Committees take into consideration the WHO document, Essential Safety Requirements for Street Vended Foods, when developing codes or guidelines for street foods.
- 96. The Committee was further informed that to date no response had been received by the secretariat to the CL 1992/3-ASIA requesting comments at step 3 on the Proposed Draft Code of Practice for Street Foods contained in ALINORM 93/15.
- 97. Following discussion on this matter, the Committee recommended that the draft Code of Practice for Street Foods be returned to Step 3 and be retained without further elaboration; that action be taken to initiate a network on street foods among the countries of the Region; and that the CAC take necessary action to request FAO and WHO to consider, where possible, providing technical assistance to the countries of the Region in this effort.
- 98. Several Delegates informed the Committee of the work being undertaken in their countries to improve the quality and safety of street vended foods (India, Indonesia, Malaysia, the People's Republic of China, Sri Lanka, and Thailand).

LABELLING OF FOODS WITH REGARD TO RELIGIOUS REQUIREMENTS (Agenda Item 12)

- 99. The Delegation of Malaysia introduced document CRD 1 which contained a new Proposed Draft Guidelines for Use of the Term "Halal" prepared by Malaysia. In introducing the draft, the Delegate from Malaysia emphasized the size of the international trade of "halal" food with huge market and business opportunities. With the enormous market potential throughout the world it was imperative that food industry understood the requirements of the consumers in this area. It was most timely that guidelines for labelling of "halal" food be developed by the Codex Alimentarius Commission to facilitate international trade.
- 100. The Proposed Draft Guidelines for Use of the Term "Halal" provided the necessary basic and general information on how such food could be produced and claimed as "halal". The Guidelines had taken into account minor differences in different Islamic School of Thought. The scope of the Guidelines limited its application to the use of the term "halal" and equivalent terms of food labels that would complement the Codex General Guidelines on Claims (CAC/GL 1-1989 (Rev. 1-1991)).
- 101. The Delegation of the Philippines recognized the importance of elaborating Guidelines for the Use of the Term "Halal". However, difficulties were anticipated in implementing the Guidelines in view of the statement therein that the guidelines were subject to various interpretations according to different Islamic Schools of Thought. The Delegation of Malaysia informed the Committee that the Guidelines were drawn up in such a way that different interpretation by importing countries could be accommodated.
- 102. In response to the question raised on possible difficulty in inspection, the Delegation of Malaysia informed that there was an existing system in practice in Malaysia on inspection in the exporting countries on halal food to overcome this problem.
- 103. With regards to requirements of other religions, it was noted that similar labelling guidelines might also be required.
- 104. Generally recognizing the importance of the elaboration of the guidelines, the Committee agreed to recommend to the Executive Committee the elaboration of Guidelines for Use of the Term "Halal", with the understanding that the Guidelines would be elaborated by the Codex Committee on Food Labelling based on the Malaysian draft. The Proposed Draft Guidelines for Use of the Term "Halal" is attached to this report as Appendix III.

CONSIDERATION OF PROPOSED DRAFT WORLDWIDE STANDARDS AT STEP 4 (Agenda Item 13)

- 105. For this item, the Committee was chaired by the Vice-Chairman of the Committee, Dr. Y. Hayashi. The Committee had before it document CX/ASIA 94/9 (Part A-E) and 94/9 Add.1, which contained the Proposed Draft Standards for Bamboo Shoots, Dried Anchovies, Fish Crackers, Pickles and Chutney and amendments (Malaysia, India) and government comments (UK, Thailand), respectively. Japan, Thailand and China submitted their written comments at the Session.
- 106. The Committee recalled that at its last Session, after considering justification statements and/or proposed draft standards, the Committee had agreed to initiate the elaboration of the standards for bamboo shoots, dried anchovies, fish crackers, pickles and chutney. It had been also agreed that those standards should be in simplified format eliminating excessive details and basing on a "horizontal" approach and should be elaborated as worldwide standards. The Committee noted that the 39th Executive Committee had approved the elaboration of the standards for the above commodities with the understanding that following the preparation of an initial draft by the CCASIA (up to Step 5), subsequent development of the draft standards should be entrusted to the relevant Codex Committees: in case of the standards for bamboo shoots, pickles and chutney, the Codex Committee on Processed Fruits and Vegetables; and in case of dried anchovies and fish crackers, the Codex Committee on Fish and Fishery Products.

PROPOSED DRAFT STANDARD FOR CANNED BAMBOO SHOOTS (Agenda Item 13-A)

- 107. The Delegation of Indonesia introduced the Proposed Draft Standard. Comments were made on the format of the Standard, "Definition", species, pH, colour, blemishes and defect, and other points requiring clarification. The Delegation of Indonesia indicated that the Proposed Draft Standard had been already revised. However, as this revised draft was not available to the Session, it was proposed that the standard should be kept at Step 3 and the revised draft should be circulated for government comments.
- 108. It was pointed out that the standard along with the other four standards should be in line with the current format of Codex standards where only essential provisions should be included with provisions for quality and additional factors put in annexes. It was also indicated that the provisions for food additives and for contaminants should be elaborated in a "horizontal" way taking into consideration General Standards for Food Additives and for Contaminants which were being developed by the CCFAC.

PROPOSED DRAFT STANDARD FOR DRIED ANCHOVIES (Agenda Item 13-B)

- 109. The Delegation of Malaysia presented the Proposed Draft Standard. It was explained that after the submission of the Proposed Draft Standards, comments had been received from the other drafting countries on the first draft, some of which had not been incorporated in the Proposed Draft Standard. Therefore it was suggested that the Proposed Draft Standards should be returned to Step 3, redrafted and circulated for government comments.
- 110. Comments made at the Session focused on the title of the standard, "Scope", definition including species, salt content and hygiene (see Appendix IV). Recognizing the importance of this commodity in the Region and the fact that the Committee did not have enough experts at the meeting, it was proposed that the written comments submitted to the Session together with the original Proposed Draft Standard be attached to this report in order to seek more comments and to facilitate the process of revision.
- 111. Japan was requested to join the drafting group pending the approval from the government of Japan.
- 112. It was agreed that the Proposed Draft Standard along with the written comments submitted be attached to this report as Appendix IV.

PROPOSED DRAFT STANDARD FOR FISH CRACKERS (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND MOLLUSCAN SHELLFISH (Agenda Item 13-C)

- 113. The Delegation of Malaysia presented the Proposed Draft Standard. The Delegation explained the same situation as the Proposed Draft Standard for Dried Anchovies and suggested that the Proposed Draft Standards should be returned to Step 3, redrafted and circulated for government comments.
- 114. Comments made at the Session were on protein content concerning moulding process, name of the standard and the provisions for composition, food additives and packing (see Appendix V). It was stated that "keropok" was a local name in Malaysia and, therefore, should be deleted from the title and main text. It was proposed that this Proposed Draft Standard be treated in the same way as the Proposed Draft Standard for Dried Anchovies.
- 115. It was agreed that the Proposed Draft Standard along with the written comments submitted be attached to this report as Appendix V.

PROPOSED DRAFT STANDARD FOR PICKLES (Agenda Item 13-D)

- 116. At the request of the Chairman, the Delegate from India introduced this item. He thanked the Secretariat for the assistance that had been given in preparing the draft standard. He further informed the Committee that to date comments had only been received from the United Kingdom.
- 117. Comments made by the Committee concerned 1. Scope, 3.2 Optional Ingredients, 3.3.4 Specific Ingredients, 4. Food Additives and 5.1 Heavy Metals. It was indicated that the Maximum Limits proposed for Heavy Metals appeared to be high and that specific limits should be those referred to by the CCFAC. It was further indicated that it appeared that the heavy metal limits proposed were those allocated to canned foods and thus a revision was necessary. Japan volunteered to participate in the revision of the standard.

PROPOSED DRAFT STANDARD FOR CHUTNEY (Agenda Item 13-E)

- 118. At the request of the Chairman, the Delegate from India introduced this item. He thanked the Secretariat for the assistance given in drafting the proposed draft standard. The Committee was informed that comments had been received only from the United Kingdom.
- 119. The Committee expressed concern over the proposed levels for heavy metals and suggested that those levels as recommended by CCFAC be utilized in preparing revised draft.

Status of the Proposed Draft Standards for: Canned Bamboo Shoots; Dried Anchovies; Fish Crackers from Marine and Freshwater Fish, Crustacean and Molluscan shellfish; Pickles; and Chutney

120. The Committee decided to return the Proposed Draft Standards to Step 3 with the understanding that they should be revised by the relevant drafting country groups and circulated for government comments well before the next session.

ELABORATION OF GUIDELINES FOR CODEX CONTACT POINTS AND NATIONAL CODEX COMMITTEES IN THE REGION (Agenda Item 14)

- 121. The Committee was informed that document CX/ASIA 94/10, which had been supposed to be a comment paper, had not been prepared as only one country, Egypt, had replied to CL 1993/34-ASIA, stating that they had had no objection to the elaboration of the guidelines.
- 122. The Committee recalled that at the last Session, when considering CX/ASIA 92/13 containing Strengthening of National Codex Committees and Guidelines for the Establishment and maintenance of a Codex Contact Point, the Committee had decided to focus its discussions on the conclusions and recommendations

of the FAO/Government of Thailand Meeting of Codex Contact Points in Asia (Bangkok, 1993). The Bangkok Meeting had recommended to consider Thailand's structural and functional organization for the efficient functioning of a Codex Contact point and National Codex Committee.

- 123. The Eighth Session of the Committee had strongly supported the elaboration of guidelines and stressed that the guidelines should include a combination of various documentation concerning this subject, with the understanding that it would be primarily based on the Thai system (ALINORM 93/15, para. 80). The 20th CAC endorsed the elaboration. For information and reference to the member governments, the Thai document Introducing Codex Contact Point and Office of National Codex Alimentarius Committee of Thailand had been sent to each Codex Contact Point in the Region upon gracious offer by the Government of Thailand.
- 124. Many countries congratulated Thailand for establishing such an efficient system. Several countries reported their situations concerning National Codex Committees.
- 125. The Delegation of Thailand stressed the importance of Contact Points and National Committees in the work of setting international standards. He introduced the structure and functions of the Thai system and several factors to be considered when establishing Contact Points and National Committees, which included the development and utilization of modern tele-communication system.
- 126. Acknowledging the important role of Codex Contact Points and National Codex Committees in Codex work, the Committee agreed that for the next session, Thailand, with assistance from the Secretariat, would draft the guidelines based on Thai System, eliminating Thai specific provisions, to be used not only in the Asian Region but throughout the world.

REPORT ON THE PRACTICE OF FOOD IRRADIATION IN THE REGION OF ASIA (Agenda Item 15)

- 127. The Committee had before it document CX/ASIA 94/11 which provided a report prepared by the International Atomic Energy Agency (IAEA) relating to the activities of interest to the Region.
- 128. The Secretariat informed the Committee on the efforts undertaken to harmonize regulations on food irradiation in the Region of Asia and the Pacific. A model regulation on food irradiation had been prepared as a result of an FAO/IAEA/UNDP Workshop held in Australia in 1993. Copies of the document were provided to the members of the Committee.
- 129. The Committee was informed of the IAEA project for introducing commercial-scale food irradiation in developing countries. In addition, the Committee was informed of the many activities in the field of food irradiation carried out by IAEA, sometimes jointly with other international agencies such as FAO and WHO.
- 130. Several countries informed the Committee of the difficulties being encountered in their countries relating to consumer acceptance of foods that had been irradiated. Other countries reported on the status of elaboration of regulations relating to food irradiation, including the use of the Codex General Standards for Irradiated Foods (CODEX STAN 106-1983) and the Codex Recommended International Code of Practice for the Operation of Irradiated Facilities Used for the Treatment of Foods (CAC/RCP 19-1979 (Rev. 1)) and the activities that were being carried out within countries in the field of food irradiation.
- 131. The Observer from IOCU expressed the organizations' objections to the use of food irradiation except in those cases where there was no other method of treating the product.
- 132. The Committee welcomed the efforts of IAEA in promoting food irradiation, along with those of FAO and WHO. The Committee requested the CAC to ask IAEA/FAO and WHO for additional technical guidance and assistance for overcoming the current low level of acceptance of irradiated foods by consumers.

NOMINATION OF THE COORDINATOR (Agenda Item 17)

- 133. The Delegation of Thailand nominated Dr. Yuzo Hayashi of Japan for appointment by the 21st Session of the Codex Alimentarius Commission as the Codex Coordinator for Asia. The Committee unanimously supported the proposal. Dr. Hayashi indicated that he accepted the nomination, subject to approval by the Government of Japan and the CAC.
- 134. The Committee also recognized the very fine work that had been carried out by the current Coordinator and Chairman and congratulated him for his effort.

OTHER BUSINESS AND FUTURE WORK (Agenda Item 18)

Current Status of Work

- 135. The Committee had before it CX/ASIA 94/2, which contained Medium-Term Objectives by Programme Area as Appendix I and the Committee's current status of work as Annex 1 of Appendix I.
- 136. The Secretariat informed the Committee that as indicated in CX/PR 92/2, all Codex Committees had been requested by the CAC to consider their medium-term objectives as a standing agenda item. It had been decided by the CAC that a report on the current status of work should be made to the Executive Committee on a regular basis, to be reviewed in the light of the medium-term objectives.
- 137. The Committee noted that after the endorsement by the Executive Committee, the subject 13, "Labelling of Food with Regard to Halal Requirement" would be elaborated by the Codex Committee on Food Labelling and the subject 19, "Certification and Inspection Issues of Concern to the Region" was being covered by the work of the Codex Committee on Food Import and Export Certification and Inspection Systems. It was also noted that the subject 22, "Safety Aspects Built into Traditional Foods and Their Improvement" had been on agenda for two sessions without documents prepared. This subject concerned foods not moving into trade, and therefore, did not seem relevant to the Codex work objectives. It was stated that as this problem was a matter of great concern to the Region, this subject might be better taken up by WHO, possibly through their regional offices.
- 138. It was proposed that the "note" of the subject 15 concerning street food should be amended in view of the decision made by the Committee under Agenda Item 11.

Conversion of Codex Regional Standards to Worldwide Standards

139. In converting Codex Regional Standards to Worldwide Standards, the Committee requested that the Codex Alimentarius Commission should continue to give careful consideration to the comments made by member countries, especially to the conditions for production of natural mineral waters, as this was rapidly increasing on a global basis.

Future Work

140. The Committee made no additional recommendations for future work of the next session of the Committee. The Secretariat informed the Committee that members should give special attention to proposing topics of special interest to the Region which could be considered for inclusion in the Agenda for the next session and which would stimulate discussion and recommended action for follow-up. Proposals should be submitted to the Secretariat as soon as possible.

DATE AND PLACE OF NEXT SESSION (Agenda Item 19)

141. The next session of the Committee was tentatively scheduled be held from 23 January 1996 in Tokyo. Several countries expressed their wish that the Session be delayed to spring.

SUMMARY STATUS OF WORK

Subject	Step	for Action by	Document
Proposed Draft Standard for Canned Bamboo Shoots	3	Indonesia (China, the Philippines, Thailand) Governments 10th CCASIA	Reference ALINORM 95/15 paras. 107-108
Proposed Draft Standard for Dried Anchovies	3	Malaysia (China, Indonesia, the Philippines, Thailand) Governments 10th CCASIA	ALINORM 95/15 Appendix IV & paras. 109-112
Proposed Draft Standard for Fish Crackers from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish	3	Malaysia (Indonesia, the Philippines) Governments 10th CCASIA	ALINORM 95/15 Appendix V & paras. 113-115
Proposed Draft Standard for Pickles	3	India (China, Nepal, Sri Lanka, Japan) 10th CCASIA	ALINORM 95/15 paras. 116-117
Proposed Draft Standard for Chutney	3 .	India (China, Nepal, Sri Lanka) 10th CCASIA	ALINORM 95/15 paras. 118-119
Proposed Draft Regional Code of Practice for Street Foods	3	Governments	ALINORM 95/15 paras. 94-98
Proposed Draft Guidelines for Use of the Term "Halal"	1,2 and 3	Executive Committee CCFL	ALINORM 95/15 Appendix III & paras. 99-104
Proposed Draft Guidelines for National Codex Contact Points and National Codex Committees	2	Thailand Secretariat 10th CCASIA	ALINORM 95/15 paras. 121-126
Promotion of Acceptance of Codex Standards, MRLs and the Codex Code of Ethics for International Trade in Food	-	Secretariat 10th CCASIA	ALINORM 95/15 paras. 31-40
Information and Government Reports on Food Control/Food Safety Issues	-	Governments 10th CCASIA	ALINORM 95/15 paras. 41-69
Agreement on the Application of Sanitary and Phytosanitary Measures and Agreement on Technical Barrier to Trade	-	Secretariat 10th CCASIA	ALINORM 95/15 paras. 70-75

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REVISED AGENDA FOR THE SESSION

Agenda	Subject	Matter
Item		

- 1. Opening of the Session
- 2. Adoption of the Agenda
- 3. Election of Vice-Chairman
- 4. Matters of Interest to the Committee Arising from the Codex Alimentarius Commission and Other Codex Committees
- 5. Matters of Interest to the Committee Arising from FAO, WHO and Other International Organizations
- 6/7. Review of Acceptances of Codex Standards and Maximum Residue Limits for Pesticides (MRLPs) by countries in the Region/Report on Commission Activities regarding the Promotion of Acceptance of Codex Standards, Maximum Residue Limits and the Code of Ethics for International Trade in Food
- 8. Information and Member Government Reports on Food Control and Food Safety Issues
- 9. Report on the Outcome of the GATT Uruguay Round (Agreements on Sanitary and Phytosanitary Measures and on Technical Barriers to Trade)
- 10. Consumer Involvement in Decision-Making in Relation to Food Standards and the Joint FAO/WHO Food Standards Programme in the Region
- 11. Proposed Draft Code of Practice for Street Foods (at Step 4)
- 12. Labelling of Foods with Regard to Religious Requirements
- 13. Consideration of Proposed Draft Worldwide Codex Standards for:
 - A. Bamboo Shoots:
 - B. Dried Anchovies
 - C. Fish Crackers:
 - D. Pickles; and
 - E. Chutney
- 14. Elaboration of Guidelines for Codex Contact Points and National Codex Committees in the Region
- 15. Report on the Practice of Food Irradiation in the Region
- 17. Nomination of the Coordinator
- 18. Other Business and Future Work
 - Conversion of Codex Regional Standards to World-wide Standards
- 19. Date and Place of Next Session
- 20. Adoption of the Report

PROPOSED DRAFT GUIDELINES FOR USE OF THE TERM "HALAL" (submitted to the Executive Committee for endorsement of the elaboration by the CCFL)

The Codex Alimentarius Commission accepts that there may be minor differences in opinion in the interpretation of lawful and unlawful animals and in the slaughter act, according to the different Islamic Schools of Thought. As such, these general guidelines are subjected to the interpretation of the appropriate authorities of the importing countries.

1. SCOPE

- 1.1. These guidelines recommend measures to be taken on the use of halal claims in food labelling.
- 1.2. These guidelines apply to the use of the term *halal* and equivalent terms in claims as defined in the General Standard for the Labelling of Prepackaged Foods and include its use in trademarks, brand names and business names.
- 1.3. These guidelines are intended to supplement the Draft Revision of the Codex General Guidelines on Claims and do not supersede any prohibition contained therein.

2. DEFINITION

Halal Food means food permitted under the Islamic Law and should fulfil the following conditions:

- (i) does not consist of or contain anything which is considered to be unlawful according to Islamic Law;
- (ii) has not been prepared, processed, transported or stored using any appliance or facility that was not free from anything unlawful according to Islamic Law; and
- (iii) has not in the course of preparation, processing, transportation or storage been in direct contact with any food that fails to satisfy (i) and (ii) above.

3. CRITERIA FOR USE OF THE TERM "HALAL"

3.1. LAWFUL FOOD

The term *halal* may be used for foods which are considered lawful. Under the Islamic Law, all sources of food are lawful <u>except</u> the following sources, including their products and derivatives which are considered unlawful:

(i) Food of Animal Origin

- (a) Pigs and boars.
- (b) Dogs, snakes and monkeys.
- (c) Carnivorous animals with claws and fangs such as lions, tigers, bears and other similar animals.
- (d) Birds of prey with claws such as eagles, vultures, and other similar birds.

- (e) Pests such as rats, centipedes, scorpions and other similar animals.
- (f) Animals forbidden to be killed in Islam i.e., ants, bees and woodpecker birds.
- (g) Animals which are considered repulsive generally like lice, flies, maggots and other similar animals.
- (h) Animals that live both on land and in water such as frogs, crocodiles and other similar animals.
- (i) Mules and domestic donkeys.
- (j) All poisonous and hazardous aquatic animals.
- (k) Any other animals not slaughtered according to Islamic Law.
- (l) Blood.

(ii) Food of Plant Origin

Intoxicating and hazardous plants.

(iii) Drink

- (a) Alcoholic drinks.
- (b) All forms of intoxicating and hazardous drinks.

(iv) Food Additives

All food additives derived from Item 3.1. (i), (ii) and (iii).

3.2. SLAUGHTERING

All lawful land animals should be slaughtered in compliance with the following requirements:

- (i) The slaughterman should be a Muslim who is mentally sound and knowledgeable of the Islamic slaughtering procedures.
- (ii) The animal to be slaughtered should be lawful.
- (iii) The animal to be slaughtered should be alive or deemed to be alive at the time of slaughtering.
- (iv) The phrase "Bismillah" (In the Name of Allah) should be invoked during slaughtering.
- (v) The slaughtering device should be sharp and should not be lifted off the animal during the slaughter act.
- (vi) The slaughter act should sever the trachea, oesophagus and main arteries and veins of the neck region.

3.3. Preparation, Processing, Packaging, Transportation and Storage

All food should be prepared, processed, packaged, transported and stored in such a manner that it complies with item 2 (ii) and (iii) above and the Codex General Principles on Food Hygiene and other relevant Codex Standards.

4. ADDITIONAL LABELLING REQUIREMENTS

- 4.1. The word halal or equivalent terms should appear on the label.
- 4.2. In accordance with the Draft Revision of the Codex General Guidelines on Claims, claims on halal should not be used in ways which could give rise to doubt about the safety of similar food or claims that halal foods are nutritionally superior to, or healthier than, other foods.

PROPOSED DRAFT STANDARD ON DRIED ANCHOVIES²

SCOPE

This standard shall apply to all commercial species of fish belonging to Stolephorus, Anchoviella and Engraulis species, that have been washed, boiled in salt water and dried.

2. DESCRIPTION

2.1 PRODUCT DEFINITION

Dried anchovies shall be prepared from fresh fish of the species Stolephorus, Anchoviella and Engraulis, obtained from the raw material described in Section 3.1.

2.2 PROCESS DEFINITION

Dried anchovies shall be prepared by boiling fresh fish in at least 5% (w/w) salt water and subsequently dried to a final moisture content of 20% (max) and a salt content of 15% (min) on a dry basis. The drying process shall mean sundrying or artificial drying.

2.3 HANDLING PRACTICE

Fresh anchovies that are not processed immediately after harvesting shall be handled under such conditions as will maintain the quality during transportation and storage up to and including the time of processing. It is recommended that the fish shall be properly chilled or iced to bring its temperature down to 0°C (32°F) as quickly as possible as specified in the "Recommended International code of Practice for Fresh Fish" (CAC/RCP 9-1976) and kept at a temperature not to exceed 1.5°C (34.7°F) prior to processing. At higher temperatures, a delay of one hour can have a serious effect on the quality of the final product.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 RAW MATERIAL

3.1.1 Anchovies

Dried anchovies shall be prepared from clean, sound fish which have characteristic fresh appearance, colour and odour.

3.1.2 Salt

Salt shall mean sodium chloride of suitable quality as specified in sub-section 5.4.2 of the "Recommended International Code of Practice for Salted Fish" (CAC/CRP 26-1979).

3.2 FINAL PRODUCT

3.2.1 The product shall be free from any microbiological spoilage, any visible fungal growth, any odour indicative of spoilage, any insect infestation and any foreign matter.

The Committee decided to return the Proposed Draft Standard to Step 3 with the understanding that it should be revised and circulated for government comments before the next session of the Committee.

- 3.2.2 The proportion of loose heads and other fish parts in any batch shall not exceed 5% by weight.
- 3.2.3 The percent breakage defined in Section 3.3 shall not exceed the limits specified for them in Section 3.5.
- 3.2.4 The product shall comply with the requirements prescribed in Table 1.

Table 1: Requirements for Dried Anchovies

Characteristics	Requirement
Moisture, % by weight, max (d.b)	20
Sodium chloride, % by weight, min (d.b)	15
Water activity (a _w), max	0.7
Acid insoluble ash, % by weight, max (d.b)	1.5

3.3 Breakage

Breakage shall mean fish which is not intact. The percent breakage is determined by the number of broken fish over the total number of fish in the test sample.

3.4 SIZE CLASSIFICATION

Size shall be determined by the length of the product (whole fish).

Size Designation	<u>Length</u>
Small	less than 4.5 cm
Medium	4.5 - 6.5 cm
Big	greater than 6.5 cm

3.5 CLASSIFICATION

Each size of dried anchovies shall be classified into three grades as defined below:

Characteristics	Grade			
Characteristics	Α	В	С	
Breakage	Less than 5%	5 - 10%	greater than 10%	
Colour (comparison of colour must be among the same species of fish)	Whitish or yellowish (characteristic of species)	darker in colour	dark greyish	
Odour	no foul or rancid smell	no foul or rancid smell	detectable foul or rancid smell	
Texture	dry and firm	dry and less firm	slightly moist and less firm	

4. HYGIENE

It is recommended that the product covered by the provisions of this proposed standard be prepared in accordance with the International Code of Practice - General Principles of Food Hygiene (Ref. No. CAC/RCP 1-1969, Rev. 1) recommended by the Codex Alimentarius Commission.

5. PACKING AND LABELLING

- 5.1 The product shall be vacuum packed in a suitable packaging material which is moisture proof, oil proof, gas impermeable and of transparent characteristics.
- 5.2 The following information shall be given on the label.

5.2.1 The Name of the Food

The name of the product shall be "Dried Anchovies".

5.2.2 Grade and Size of Product

The product grade and size shall be declared.

5.2.3 Scientific and Common Names

The scientific and common names of the fish shall be declared.

5.2.4 Net Contents

The net contents shall be declared by weight, in either the metric system ("Systeme International") or avoirdupois or both systems of measurement as required by the country in which the product is sold.

5.2.5 Name and Address

The name and address of the manufacturer, packer, distributor, importer, exporter or vendor of the product shall be declared.

5.2.6 Country of Origin

The country of origin of the product shall be declared if its omission would mislead or deceive the consumer.

5.2.7 Lot Identification

Each container shall be permanently marked, in code or in clear to identify the producing factory and the lot.

5.2.8 Additional Requirements

The package shall bear clear directions for keeping the product from the time they are purchased from the retailer to the time of their use and directions for cooking.

6. METHODS OF SAMPLING AND ANALYSIS

The method of sampling and analysis described hereunder are international referee methods which are subject to endorsement by the Codex Committee on Methods of Analysis and Sampling.

- 6.1 GENERAL REQUIREMENTS OF SAMPLING³
- 6.1.1 Samples shall be taken in a protected place, not exposed to damp air, dust or soot.
- 6.1.2 The sampling instrument shall be clean and dry.
- 6.1.3 Precautions shall be taken to protect the sample, the material being sampled, the sampling instrument and the sample containers from adventitious contamination.
- 6.1.4 The sample shall be placed in clean, dry glass containers of such size that they are almost completely filled by the sample.
- 6.1.5 Each container shall be sealed air tight with a stopper or suitable closure in such a way that it could not be opened and resealed without detection. It is marked with full details of sampling, date of sampling, name of the vendor and other important particulars of the consignment.
- 6.1.6 Samples shall be stored in such a manner that there is no deterioration of the material.

6.2 SCALE OF SAMPLING

- 6.2.1 Lot. All containers in a single consignment of the material drawn from a single batch of manufacturer shall constitute a lot. If a consignment is declared to consist of different batches of manufacture, the batches shall be grouped separately and the containers in each group shall constitute a separate lot. Samples shall be tested for each lot to ascertain conformity of the material to the requirements of this specification.
- 6.2.2 Gross Sample. The number of containers to be selected for a lot shall depend on the size of the lot and shall be in accordance with columns 1 and 2 of Table 2. The containers to be selected for sampling shall be chosen at random from the lot and for this purpose, a random number table as agreed upon between the purchaser and the vendor shall be used.
- 6.2.3 Test Sample. Draw with an appropriate sampling instrument equal quantities of the material from each container selected (Table 2). The total quantity of the material so obtained from the different selected containers shall be well mixed and shall be at least 0.5 kg.

Table 2: Number of Containers to be Selected for Sampling

Lot Size (N)	No. of Containers to be Selected for Sampling (n)
2 to 15	2
16 to 40	3
41 to 65	4
66 to 110	5
111 to 180	6
181 to 300	7
301 to 450	8
451 to 600	9
601 to 800	10

6.3 DETERMINATION OF MOISTURE

According to method set out in Annex A.

The Codex Committee on Methods of Analysis and Sampling is currently elaborating General Guidelines on Sampling.

- 6.4 DETERMINATION OF SODIUM CHLORIDE

 According to method set out in Annex B.
- 6.5 Determination of Water Activity

 According to method set out in Annex C.
- 6.5 Determination of Acid Insoluble Ash

 According to method set out in Annex D.

DETERMINATION OF MOISTURE (AIR-OVEN METHOD)

According to the method described in AOAC Official Methods of Analysis, 14th Ed. (1984).

A1. PREPARATION OF SAMPLE

A1.1 Representative sample selected from the lot (sub-section 6.2.3) to be analyzed shall be thoroughly mixed. Comminute the sample as finely as possible to obtain a homogeneous sample, care being taken that no moisture is lost during the process. Keep the material in an air-tight container to prevent changes in moisture content during subsequent handling. Use this material for testing.

A2. PROCEDURE

A2.1 Accurately weigh 4 g of the well-mixed sample into a previously dried and weighed dish. Shake slowly until sample is evenly distributed. Uncover the dish and dry the content at 105 ± 2°C to a constant weight. Repeat the same procedure for each weighing. Retain the dried material for the determination of sodium chloride (Annex B) and acid insoluble ash (Annex C).

A3. CALCULATION

Moisture, percent by weight =
$$\frac{(W_1 - W_2)}{(W_1 - W)}$$
 x 100 where,

W is the weight, in grammes, of the empty dish;

W₁ is the weight, in grammes, of the dish with the material before drying;

W₂ is the weight, in grammes, of the dish with the material after drying.

ANNEX B

DETERMINATION OF SODIUM CHLORIDE

According to the method described in AOAC Official Methods of Analysis, 14th Ed. (1984).

B1. PREPARATION OF SAMPLE

Use sample from A2.1.

B2. APPARATUS

- B2.1 Erlenmeyer flask, 250 ml
- B2.2 Electric hot-plate or sand bath
- B2.3 Titration apparatus

B3. REAGENTS

- B3.1 Standard silver nitrate solution, 0.1 N. Standardized against 0.1 N sodium chloride solution.
- B3.2 Dilute nitric acid 1:4.

- B3.3 Ferric alum indicator solution. A saturated solution of ferric alum.
- B3.4 Standard potassium thiocyanate solution, 0.1 N. Standardized against 0.1 N silver nitrate.

B4. PROCEDURE

- B4.1 Take 0.3 g to 0.5 g of the dried material (from A2.1) in a 250 ml Erlenmeyer flask. Add a known volume of standard silver nitrate solution in quantity more than sufficient to precipitate all the chloride as silver chloride and then add 20 ml of dilute nitric acid.
- B4.2 Boil on hot-plate or sand-bath until the solids except silver chloride, dissolve.
- B4.3 Cool and add 50 ml of water and 5 ml of ferric alum indicator solution and titrate against standard potassium thiocyanate solution until a permanent light brown colour appears.

B5. CALCULATION

Sodium chloride, per cent by weight =
$$\frac{5.85 (V_1 N_1 - V_2 N_2)}{W}$$
 where,

V₁ is the volume, in millilitres of standard silver nitrate solution used;

N₁ is the normality of standard silver nitrate solution;

V₂ is the volume, in millilitres, of standard potassium thiocyanate used;

N₂ is the normality of standard potassium thiocyanate;

W is the weight, in grammes, of the dried material used for the test.

ANNEX C

DETERMINATION OF WATER ACTIVITY (a_w)

According to the method described in the Operating Manual by Novasina Ag., Postfach, CH-8050 Zurich, Switzerland.

C1. PREPARATION OF SAMPLE

Use sample from A2.1.

C2. APPARATUS

Novasina AG humidity and temperature measuring instrument or equivalent.

C3. PROCEDURE

- C3.1 Operate and calibrate the instrument using standard salt (Mg (NO₃)₂ 6(H₂O) or NaCl).
- C3.2 Fill the sample bowl with the test sample using a spatula. Avoid touching the test sample with fingers.
- C3.3 Open the lid of the instrument, uncap the measuring head and place the sample bowl in the measuring chamber. Replace the measuring head and close the lid.

C3.4 Read the equilibrium humidity of the test sample from the LCD display in % RH when the measured value remains unchanged for several minutes and the temperature indicated corresponds to the preselected value (25°C).

C3.5 CALCULATION

$$a_{w} = \frac{\% RH}{100}$$

ANNEX D

DETERMINATION OF ACID INSOLUBLE ASH

According to the method described in AOAC Official Methods of Analysis, 14th Ed. (1984).

D1. PREPARATION OF SAMPLE

Use sample from A2.1.

- D2. REAGENT
- D2.1 Dilute hydrochloric acid, 1:1.
- D3. PROCEDURE
- D3.1 Weigh accurately about 2 g of the dried sample (from A2.1) in a tared porcelain, silica or platinum dish. Ignite with a burner for about 1 hour. Complete the ignition by putting sample in a muffle furnace at 600 ± 20 °C until grey ash results.
- D3.2 Cool and add 25 ml of dilute hydrochloric acid, cover with a watch-glass and heat on water bath for 10 min.
- D3.3 Cool and filter through Whatman filter paper No. 42 or its equivalent.
- D3.4 Wash the residue with hot water until the washings are free from chlorides as tested with silver nitrate solution and return the filter paper and residue to the dish. Keep it in an electric air oven maintained at 135 ± 2°C for about 3 hours.
- D3.5 Ignite it in a muffle furnace at $600 \pm 20^{\circ}$ C for 1 hour. Cool in a desiccator and weigh. Ignite the dish again for 30 min, cool and weigh. Repeat this procedure until the difference between two successive weighings is less than 1 mg. Record the lowest weight.

D_{3.6} CALCULATION

Acid insoluble ash, percent by weight =
$$\frac{(W_2 - W)}{(W_1 - W)}$$
 x 100

where,

W is the weight in grammes, of the empty dish;

W₁ is the weight in grammes, of the dish with the dried sample taken from the test;

W₂ is the lowest weight in grammes, of the dish with the acid insoluble ash.

GOVERNMENT COMMENTS ON THE PROPOSED DRAFT STANDARDS FOR DRIED ANCHOVIES

General Comments

United Kingdom

The 19th Session of the Codex Alimentarius Commission agreed that all Codex standards should present the information pertaining to consumer protection and safety in the main body of the standard and that any quality information should be presented in an advisory appendix. The proposed standards should be amended to reflect the agreed format.

TITLE

Indonesia

The title of the proposed draft standard should be more specific since there are different species and types of dried anchovies, i.e., dried salted anchovies, semi-dried salted anchovies and dried unsalted anchovies.

1. SCOPE

Thailand

Thailand proposes:

- to use the "Family Engraulidae" instead of species of fish; and
- to expand the Scope to cover fish dried immediately after cleaning with salt water.

<u>Japan</u>

The phrase "excluding Engraulis japonica" should be added after "Stolephorus, Anchoviella and Engraulis species".

"Niboshi" (dried boiled small anchovy), a Japanese traditional food, seems to fall within the scope of the proposed draft standard. However, for the reasons mentioned below, "niboshi" and dried anchovies prescribed in the proposed draft standard are the two different foods and they should be differentiated clearly. Thus, Japan proposes *Engraulis japonica* should be excluded from the Scope since it is a major ingredient of "niboshi".

The first reason is the high salt level of dried anchovies. The proposed draft standard prescribes for salt content more than 15 %. Dried anchovies with such a high salt level would not be accepted by Japanese consumers. On the average, salt content of "niboshi" is about 3%. Japan imports approximately 4000 t of dried *Engraulis japonica* to be used as an ingredient of processed foods, but their salt levels are no more than 3%.

The second reason is that in Japan dried anchovies with such characteristics as "dark greyish" colour and/or "a detectable foul or rancid smell" (3.5 Classification) would not be acceptable as an ingredient of "niboshi".

2.2 PROCESS DEFINITION

Thailand

Amend the wording "salt content of 15% (min) on a dry basis" to read "salt content of 15% (max) on a dry basis".

Thailand proposes to add two processes, to correspond with the additional scope, as follows:

- 2.2.1 Fish boiled in salt water and subsequently dried.
- 2.2.2 Fish dried immediately after cleaning with salt water.

Indonesia

The percentage of salt in salt water should be > 3% instead of > 5%, especially if the product is intended for Japanese market. Such concentration will result in about 10% of salt content in the final product with about 50 % water content.

The final moisture content should be < 30% for dried salted anchovies and < 50% for semi-dried salted anchovies.

2.3 HANDLING PRACTICE

Indonesia

The range of temperature for chilling should be 0 - 5°C (40°F) rather than 0 - 1.5°C since this temperature is quite safe for handling fish including fish producing histamine.

3.2 FINAL PRODUCT - 3.2.1

Thailand

Specify the scope of any "foreign matter".

Indonesia

The statement "... free from microbiological spoilage ..." should be modified to read "... free from any pathogenic bacterium ..." or Total Plate Count of $< 1 \times 10^5$ for dried salted anchovies and $< 5 \times 10^5$ for semi-dried salted anchovies.

- 3.2.2

Thailand

Thailand proposes to establish the following: preparation of sample; procedure; and size of sample.

<u>Indonesia</u>

The proportion of loose heads and other fish parts in any batch should be < 10% rather than < 5% by weight.

- 3.2.4 - Table 1

Thailand

Thailand proposes the following:

- delete "(d.b)" from the moisture provision;
- replace "min" with "max" in the provision for sodium chloride; and
- amend water activity to 0.85.

Indonesia

The quality requirements for dried anchovies should be set for two groups, i.e., dried salted anchovies and semi-dried salted anchovies as follows:

Characteristics	Requirement	
Gharacteristics	Dried	Semi-dried
Moisture, % by weight, max (d.b.)	30	50
Sodium chloride, % by weight, min (d.b.)	15	10
Water activity, max	0.7	0.85
Acid insoluble ash, % by weight, max (d.b.)	1.5	1

3.3 BREAKAGE

Thailand

Add "excluding fin and scale" after the first sentence.

Thailand proposes to establish the following: procedure; preparation of sample; and size of sample in an annex.

3.4 SIZE CLASSIFICATION

<u>Indonesia</u>

Size Designation	Length (cm)	
Size Designation	Small Species	Large Species
Small	1 - 1.5	< 4.5
Medium	1 - 2.0	4.5 - 6.5
Large	2 - 2.5	> 6.5

3.5 CLASSIFICATION

Indonesia

Characteristics	Grade A	Grade B	Grade C
Breakage	< 10%	10 - 15%	> 15 %
Colour	Whitish or bluish (characteristic of species)	Darker in colour	Dark brownish

5. PACKING AND LABELLING - 5.1

Thailand

Replace "shall" with "should".

<u>Indonesia</u>

This part should be modified to read "The dried salted anchovies should be vacuum packed and semi-dried salted anchovies should be frozen at -18°C. The product should be packed in suitable packaging materials".

- 5.2.1 The Name of the Food

Indonesia

The name of the product shall be "Dried Salted Anchovies or Semi-Dried Salted Anchovies".

6.1 GENERAL REQUIREMENTS OF SAMPLING - 6.1.1

Thailand

Replace "shall" with "should".

- 6.1.4

Thailand

Delete "glass" as there are many other suitable containers.

6.2 SCALE OF SAMPLING

Sampling methods for bulk container should be explained.

Clarification of the term "well mix" is needed.

ANNEX A - A2. PROCEDURE

Thailand

The temperature should be 100°C rather than 105°C in order to prevent the loss of volatile matter.

ANNEX D - D3.2

Thailand

Add the following as a footnote:

Acid insoluble ash: The ash or water-insoluble ash is boiled with 25 ml of dilute hydrochloric acid (10% m/m HCl) for 5 min, the liquid filtered through an ashless filter paper and thoroughly washed with hot water. The filter paper is then ignited in the original dish, cooled and weighed. In some instances it is advisable to commence by evaporating the ash to dryness with concentrated hydrochloric acid to render the silica insoluble before repeated treatment with hot dilute acid. The acid insoluble ash is a measure of the sandy matter.

Reference: Pearson's Composition and Analysis of Foods, 9th Ed. (1991)

PROPOSED DRAFT STANDARD FOR FISH CRACKERS (DRIED KEROPOK) FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND MOLLUSCAN SHELLFISH⁴

1. SCOPE

This standard shall apply to dried crackers (dried keropok) prepared from marine and freshwater fish, crustacean and molluscan shellfish. It does not include artificially flavoured fish, crustacean and molluscan shellfish crackers.

2. DESCRIPTION

2.1 PRODUCT DEFINITION

Dried cracker is a traditional snack food made from the fresh minced flesh of either marine (including both the red meat and white meat species) or freshwater fish, crustacean (including prawns and shrimps) and molluscan shellfish (including squids, cuttlefish, oysters, clams, mussels and cockles) as described in section 3.1 and other ingredients as described in section 3.2. It shall not include the ready-to-eat fried dried cracker made from either marine or freshwater fish, crustacean, molluscan shellfish and artificially flavoured fish, crustacean and molluscan shellfish.

2.2 PROCESS DEFINITION

Dried cracker shall be prepared by mixing all the ingredients, forming, cooking, cooling, slicing and drying. The product shall be deep fried before consumption. The product prepared from frozen minced flesh may contain phosphate as food conditioner.

2.3 HANDLING PRACTICE

Fresh marine and freshwater fish, crustacean and molluscan shellfish shall be preserved immediately after harvesting by chilling or icing to bring its temperature down to 0°C (32°F) as quickly as possible as specified in the Recommended International Code of Practice for Fresh Fish (CAC/RCP 9-1976) by the Codex Alimentarius Commission, and kept at a temperature not to exceed 1.5°C (34.7°F) prior to processing.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 RAW MATERIAL

Dried fish cracker shall be prepared from clean, sound marine or freshwater fish, crustacean and molluscan shellfish which have characteristic fresh appearance, colour and odour.

3.2 OTHER INGREDIENTS

Starch, sugar, salt and potable water. Starch shall mean tapioca (Manihot sp.) and/or sago (Metroxylon) starch. Potable water shall have properties in accordance with the requirements contained in the "International Standard for Drinking Water".

The Committee decided to return the Proposed Draft Standard to Step 3 with the understanding that it should be revised and circulated for government comments before the next session of the Committee.

3.3 FINAL PRODUCT

- 3.3.1 The product shall display a uniform size, shape, colour thickness and texture.
- 3.3.2 The product shall be free from any microbiological spoilage, any visible fungal, adulterants, foreign matter and other signs of spoilage.
- 3.3.3 The product may contain permitted flavour enhancer and phosphate in accordance with the criteria in the General Principles for the Use of Food Additives adopted by Codex Alimentarius Commission.
- 3.3.4 The product shall comply with the requirements prescribed in Table 1.

Table 1: Requirements for Dried Fish Crackers From Marine and Freshwater Fish, Crustacean and Molluscan Shellfish

	Marine Fish		Freshwater	Crustacean and
Characteristics	Red meat spp.	White meat spp.	Fish	Molluscan Shellfish
Crud protein (N x 6.25) (w/w %, min)	15.0	12.0	12.0	7.0
Moisture content (w/w %)	8.0 to 12.0	8.0 to 12.0	8.0 to 12.0	8.0 to 12.0
Linear expansion (%, min)	85	85	85	85

4. FOOD ADDITIVES

Additives Maximum Level

Stabilizer

452 Sodium polyphosphate 0.5% (w/w)

Flavour enhancer

621 Monosodium glutamate 0.1% (w/w)

5. HYGIENE

It is recommended that the product covered by the provisions of this proposed standard be prepared in accordance with the International Code of Practice on General Principles of Food Hygiene (CAC/RCP 1-1969, Rev. 1) recommended by the Codex Alimentarius Commission.

6. PACKING AND LABELLING

- The product shall be vacuum packed in a suitable packaging material which is moisture proof, oil proof, gas impermeable and of transparent characteristics.
- 6.2 The following information shall be given on the label.

6.2.1 The name of the product from marine and freshwater fish shall be "Dried Fish Crackers" and those from crustacean and molluscan shellfish shall depict the common name of the species, example "Dried Prawn Crackers", "Dried Squid Crackers" etc.

6.3 LIST OF INGREDIENTS

A complete list of ingredients shall be declared on the label in descending order of proportion. Sections 3.2(b) and (c) of the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1981) shall also apply except that food additives present in the product which are in accordance with sections 4 need not be declared.

6.4 SCIENTIFIC AND COMMON NAMES

The scientific and common names of marine fish, freshwater fish, crustacean and molluscan shellfish shall be declared.

6.5 **NET CONTENTS**

The net contents shall be declared by weight, in either the metric system ("Systeme International") or avoirdupois or both systems of measurements as required by the country in which the product is sold.

6.6 NAME AND ADDRESS

The name and address of the manufacturer, packer, distributor, importer, exporter or vendor of the product shall be declared.

6.7 COUNTRY OF ORIGIN

The country of origin of the product shall be declared if its omission would mislead or deceive the consumer.

6.8 LOT IDENTIFICATION

Each container shall be permanently marked in code or in clear to identify the producing factory and the lot.

6.9 ADDITIONAL REQUIREMENTS

The package shall bear clear directions for keeping the product from the time it is purchased from the retailer to the time of its use and directions for cooking.

7. METHODS OF SAMPLING AND ANALYSIS

The methods of sampling and analysis described here are international referee methods which are subject to endorsement by the Codex Committee on Methods of Analysis and Sampling.

7.1 GENERAL REQUIREMENTS OF SAMPLING⁵

- 7.1.1 Samples shall be taken in a protected place, not exposed to damp air, dust or soot.
- 7.1.2 The sampling instrument shall be clean and dry.

The Codex Committee on Methods of Analysis and Sampling is currently elaborating General Guidelines on Sampling

- 7.1.3 Precautions shall be taken to protect the sample, the material being sampled, the sampling instrument and the sample containers from adventitious contamination.
- 7.1.4 The sample shall be placed in clean, dry glass containers of such size that they are almost completely filled by the sample.
- 7.1.5 Each container shall be sealed air tight with a stopper or suitable closure in such a way that it could not be opened and resealed without detection. It is marked with full details of sampling, date of sampling, name of the vendor and other important particulars of the consignment.
- 7.1.6 Samples shall be stored in such a manner that there is no deterioration of the material.

7.2 SCALE OF SAMPLING

- 7.2.1 Lot. All containers in a single consignment of the material drawn from a single batch of manufacturer shall constitute a lot. If a consignment is declared to consist of different batches of manufacture, the batches shall be grouped separately and the containers in each group shall constitute a separate lot. Samples shall be tested for each lot to ascertain conformity of the material to the requirements of this specification.
- 7.2.2 Gross Sample. The number of containers to be selected for a lot shall depend on the size of the lot and shall be in accordance with columns 1 and 2 of Table 2. The containers to be selected for sampling shall be chosen at random from the lot and for this purpose, a random number table as agreed upon between the purchaser and the vendor shall be used.
- 7.2.3 Test Sample. Draw with an appropriate sampling instrument equal quantities of the material from each container selected (Table 2). The total quantity of the material so obtained from the different selected containers shall be well mixed and shall be at least 0.5 kg.

Table 2: Number of Containers to be Selected for Sampling

Lot Size (N)	No. of Containers To Be Selected For Sampling (n)
2 to 15	2
16 to 40	3
41 to 65	4
66 to 110	5
111 to 180	6
181 to 300	7
301 to 450	8
451 to 600	9
601 to 800	10

7.3 DETERMINATION OF CRUDE PROTEIN

According to method set out in Annex A.

7.4 DETERMINATION OF MOISTURE

According to method set out in Annex B.

7.5 DETERMINATION OF LINEAR EXPANSION

According to method set out in Annex C.

DETERMINATION OF CRUDE PROTEIN

According to the method listed below or according to AOAC Official Methods of Analysis, 14th Ed. (1984).

A1. PREPARATION OF SAMPLE

A1.1 Representative sample selected from the lot (sub-section 7.2.3) to be analyzed shall be thoroughly mixed. Comminute sample as finely as possible to obtain a homogeneous sample, care being taken that no moisture is lost during the process. Keep the material in an air-tight container to prevent changes in moisture content during subsequent handling. Use this material for testing.

A2. APPARATUS

- A2.1 Kjeldahl digestion and distillation equipment made-up of the following are used:
 - a) Digestion flask
 - b) Digestion system 20 or its equivalent
 - c) Receiving flask, 250 ml capacity
 - d) Kjeltec distillation system or its equivalent
- A2.2 Titration Apparatus

A3. REAGENTS

- A3.1 Catalyst, mixture of 3.5 g of potassium sulphate and 0.175 g mercuric oxide (1 tablet).
- A3.2 Sulphuric acid, concentrated, about specific gravity of 1.84 at 20°C.
- A3.3 Sulphuric acid, 0.1 N standard volumetric solution. Standardize against sodium hydroxide solution (A3.4) using methyl red as indicator (A3.8).
- A3.4 Sodium hydroxide, 0.1 N standard volumetric solution.
- A3.5 Sodium hydroxide, 50% w/v.
- A3.6 Boric acid, 4% w/v.
- A3.7 Bromocresol green-methyl red indicator solution. Dissolve 0.016 g methyl red and 0.082 g bromocresol green in 100 ml of ethanol (95% v/v).
- A3.8 Methyl red indicator. Dissolve 1 g of methyl red in 200 ml of ethanol (95% v/v).

A4. PROCEDURE

A4.1 Weigh accurately 0.5 g of the sample and place it in a digestion flask. Add 1 tablet of the catalyst. Wash down any sample adhering to the neck of the flask with some water. Add 20 ml of concentrated sulphuric acid. Heat gently. When the initial frothing has ceased, heat the flask more vigorously so that the liquid boils at a moderate rate. Shake the flask occasionally and heat it until a clear blue colour is obtained.

- A4.2 Allow the flask to cool. Connect up the distillation apparatus. To the receiver flask add 25 ml of 4% w/v boric acid and 2 to 4 drops of bromocresol green-methyl red indicator. Gently add 50 ml to 60 ml of 50% w/v sodium hydroxide solution to the digest in the digesting flask. Begin distillation until all the ammonia has distilled over (at least 150 ml distillate).
- A4.3 Titrate the distillate with 0.1 N sulphuric acid.
- A4.4 Carry a blank determination, using the same reagents but without the sample.

A5. CALCULATION

Volume of sample titration = Volume of total titration (A4.3) Volume of blank titration (A4.4)

1 ml 0.1 N sulphuric acid = 0.001401 g nitrogen

Total nitrogen, percent by weight =
$$\frac{\text{weight of nitrogen, in g}}{\text{weight of sample, in g}} \times 100$$

Total crude protein, percent by weight = Total nitrogen (%) x 6.25.

ANNEX B

DETERMINATION OF MOISTURE (AIR-OVEN METHOD)

According to the method described in AOAC Official Methods of Analysis, 14th Ed. (1984).

B1. PREPARATION OF SAMPLE

B1.1 Representative sample selected from the lot (sub-section 7.2.3) to be analyzed shall be thoroughly mixed. Comminute the sample as finely as possible to obtain a homogeneous sample, care being taken that no moisture is lost during the process. Keep the material in an air-tight container to prevent changes in moisture content during subsequent handling. Use this material for testing.

B2. PROCEDURE

B2.1 Accurately weigh 2 g of the well-mixed sample into a previously dried and weighed dish. Shake slowly until sample is evenly distributed. Uncover the dish and dry the content at $105 \pm 2^{\circ}$ C to a constant weight. Repeat the same procedure for each weighing.

B3. CALCULATION

Moisture, percent by weight =
$$\frac{(W_1 - W_2)}{(W_1 - W)} \times 100$$

where,

W is the weight, in grammes, of the empty dish;

W₁ is the weight, in grammes, of the dish with the material before drying;

W₂ is the weight, in grammes, of the dish with the material after drying.

ANNEX C

DETERMINATION OF LINEAR EXPANSION

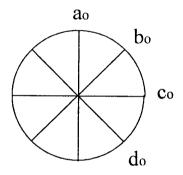
According to the method described in MARDI Publication No. 182 (local).

C1. PREPARATION OF SAMPLE

C1.1 Representative sample selected from the lot (sub-section 7.2.3) to be analyzed shall be used.

C2. PROCEDURE

C2.1 Draw four lines on the surface of each dried fish cracker and mark as a₀, b₀, c₀ and d₀ (see diagram).



- C2.2 Measure each line using a string and ruler.
- C2.3 Heat oil to 160 170°C and fry each cracker carefully by pressing it down with a ladle to make sure the expanded shape remains flat.
- C2.4 Once product has expanded fully, remove from oil, drain and measure the marked lines as a_i , b_i , c_1 and d_1 .

C4. CALCULATION

Linear expansion =
$$\begin{bmatrix} a_1-a_0 & b_1-b_0 & c_1-c_0 & d_1-d_0 \\ ---- & + & ---- & + & ---- \\ a_0 & b_0 & c_0 & d_0 \end{bmatrix} \times 100$$

GOVERNMENT COMMENTS

General Comments

United Kingdom

The 19th Session of the Codex Alimentarius Commission agreed that all Codex standards should present the information pertaining to consumer protection and safety in the main body of the standard and that any quality information should be presented in an advisory appendix. The proposed standards should be amended to reflect the agreed format.

2.3 HANDLING PRACTICE

Indonesia

The range of chilling temperature should be 0 - 5°C, since handling at this range of temperature is quite safe for handling most fish species including fish producing histamine.

3.2 OTHER INGREDIENTS

Thailand

Thailand suggests the following amendment to the wording:

Starch → Starch and/or flour.

3.3 FINAL PRODUCT - 3.3.2

Indonesia

The statement "... free from microbiological spoilage ..." should be modified to read "... free from any pathogenic bacterium ..." or Total Plate Count of $< 5 \times 10^4$.

- 3.3.4 - Table 1.

Thailand

The minimum contents of crude protein should be 12.0 % (w/w) for both marine and freshwater fish and 7.0 % for crustacean and molluscan shellfish.

China

China suggests to modify the provision for crude protein as follows as it is difficult to identify the raw materials with the definite method:

Characteristic	Class A	Class B	Class C
Crude Protein (N x 6.25) (w/w %)	> 10	≤ 10, > 5	≤ 5

Indonesia

The requirements for crude protein and moisture content should be amended as follows:

Characteristic	Grade I	Grade II	Grade III
Crude Protein (N x 6.25) (w/w %, min)	8	. 5	2
Moisture content (w/w % max)	12	12	14

4. FOOD ADDITIVES

Thailand

Monosodium glutamate should be limited by GMP.

China

Monosodium glutamate should be deleted from the list of food additives.

6. PACKING AND LABELLING - 6.1

Thailand

The word "vacuum" should be deleted as the product may be damaged by the process.

China

Non-vacuum packing could be used as well.

<u>Indonesia</u>

The word "vacuum" should be deleted.

ANNEX A

Thailand

There should be a reference to AOAC Official Methods of Analysis, 15th Ed. (1990).

ANNEX C - C2.3

Thailand

The range of the frying temperature should be 190 - 204°C and all test references shall be declared.

ADDITION OF A PROVISION

China

Definition of the term "broken cracker":

The area of the cracker is less than half of that of the complete cracker or there are obvious cracks on the surface of the cracker and after struck by the fixed test method it could produce broken cracker.

The percentage of broken crackers in the Table 1 of 3.3.4 should be less than 10 %.