

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of  
the United Nations



World Health  
Organization

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Agenda Item 5(a)

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

38<sup>th</sup> Session, CIGG

Geneva, Switzerland, 6-11 July 2015

#### COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED TO THE COMMISSION FOR ADOPTION

(Comments submitted by 18 June 2015)

#### KENYA

Kenya supports the adoption of part 1 of the Codex standards at step 8.

**Committee on Food Hygiene**  
**Comité sur l'hygiène alimentaire**  
**Comité sobre Higiene de los Alimentos**

Hygiene sections in meat commodity standards (Amendments) ((para. 12, Appendix III).

*Comments of Peru*

#### PERU

No se realizan observaciones.

Guidelines for the Control of *Trichinella* spp. in Meat of Suidae (Draft) at Step 8 (para. 33, Appendix IV).

*Comments of Peru*

#### PERU

No se realizan observaciones.

Code of Hygienic Practice for Low-Moisture Foods (Draft) at Step 5/8 (para. 44, Appendix V).

*Comments of Peru*

#### PERU

No se realizan observaciones.

**Committee on Nutrition and Foods for Special Dietary Uses**  
**Comité du Codex sur la nutrition et les aliments diététiques ou de régime**  
**Comité del Codex sobre Nutrición y Alimentos para Regímenes Especiales**

General Principles for the Addition of Essential Nutrients to Foods (Draft Revision) at Step 8 (para. 53, Appendix III).

*Comments of Argentina and Brazil*

#### ARGENTINA

Argentina acuerda con el documento.

**BRAZIL**

At the 36<sup>th</sup> Session of CCNFSDU, Brazil stated reservation regarding the wording adopted in session 3.3.2 of the document (paragraph 46 of REP 15/NFSDU). Brazil considers that it is of great importance the inclusion of a clear reference to the nutritional value of foods in the principles in order to be in line with WHO Guidelines to prevent diet-related noncommunicable diseases (NCDs). Hence, Brazil is in favour of retaining the forming wording "taking into account the nutritional value in the food" in section 3.2.2. It is important to highlight that this matter had been discussed during the 35<sup>th</sup> Session of CCNFSDU and that Brazil and other delegations requested to retain the text "3.3.2 Foods to which essential nutrients may not be added should take into account the nutritional value of the foods" (paragraph 60 of REP 14/NFSDU).

Furthermore, it is important that the Committee takes into account the decisions made and strategies adopted at intergovernmental fora, such as the World Health Assembly and also the ICN2, which had highlighted the important role of Codex in promoting healthy diet and preventing obesity and diet-related NCDs, as stated by the Representative of WHO.

The Committee should also consider the recent "WHO Guideline: Sugars intake for adults and children (2015)". This new guideline confirms that adults and children should maintain a reduced intake of free sugars over the life course and recommends that free sugars intake be reduced to less than 10% of total energy intake to reduce the risk of NCDs in adults and children, with a particular focus on the prevention and control of unhealthy weight gain and dental caries.

Brazil agrees with the other sessions of the document.

Additional or Revised Nutrient Reference Values for Labelling Purposes in the *Guidelines on Nutrition Labelling* (CAC/GL2-1985) (Proposed draft) at Step 5/8 (para. 82, Appendix IV, Part 1).

*Comments of Argentina, Brazil and Singapore*

**ARGENTINA**

Argentina acuerda con el documento.

**BRAZIL**

Brazil agrees with the document.

**SINGAPORE**

Singapore supports the adoption of NRVs-R for vitamin C, zinc, selenium, manganese and molybdenum at step 5/8. These are essential nutrients for maintenance of health for the general population. The proposed values also took into consideration the General Principles for establishing NRVs for the General Population, and the recommendations made by the recognised authority scientific bodies (RASB)\*, which are based on more recent evidence.

Nutrient Reference Value for Potassium in Relation to the Risk of Non- Communicable Disease (Proposed draft) at Step 5/8 (para. 116, Appendix V).

*Comments of Argentina, Bangladesh, Brazil and Singapore*

**ARGENTINA**

Argentina está de acuerdo con la propuesta de VRN-ENT para el potasio y las propuestas para las Notas 3 y 4.

**BANGLADESH**

The Sodium reference value 2000mg is low. CDC Review finds a level of 4.9 is more beneficial than recommended 2g. Moreover the Temperate countries with sun shine causes more sodium loss through sweat and this should be allowed for the loss to an extent of 5000mg for daily intake. American sports study documented a daily loss of sodium up to 17g in sunshine.

Therefore Bangladesh suggest the level of 5g NRV for an adult.

**BRAZIL**

Brazil agrees with the document.

**SINGAPORE**

Singapore supports the adoption of Nutrient Reference Value for Potassium in relation to the risk of non-communicable diseases, at Step 5/8 recognizing the established relationship of increased potassium intake and decreased sodium intake to reduce blood pressure and risk of cardiovascular diseases, stroke and coronary heart disease in adults

Annex of the *Guidelines on Nutrition Labelling (CAC/GL2-1985)* (Amendments) (para. 82, Appendix IV, Part 2).

*Comments of Argentina and Brazil*

**ARGENTINA**

Argentina acuerda con el documento.

**BRAZIL**

Brazil agrees with the amendments.

List of Food Additives in CODEX STAN 72-1981 (Proposed draft revision) (para. 152, Appendix VI, Part 1).

*Comments of Argentina and Brazil*

**ARGENTINA**

Argentina acuerda con el documento.

**BRAZIL**

Brazil agrees with the conclusions stated in para 152 and Appendix VI Part 1.

Inclusion of zinc citrates in the *Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses Intended for Infants and Young Children (CAC/GL10-1979)* (para. 188, Appendix VIII).

*Comments of Argentina and Brazil*

**ARGENTINA**

Argentina no tiene comentarios.

**BRAZIL**

Brazil agrees with the amendments.

*Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CODEX STAN 118-1979)*, to add the term "Khorasan wheat" (Draft amendments) (para. 193, Appendix X).

*Comments of Argentina and Brazil*

**ARGENTINA**

Argentina acuerda con la propuesta de enmienda a la norma CODEX STAN 118-1979, a fin de añadir el término "trigo khorasan", conocido comercialmente bajo la marca KAMUT.

Al respecto en la normativa vigente, la variedad de Trigo *kamut (Triticum polonicum L.)*, está incluida en la definición de alimentos libres de gluten, "se entiende por "alimento libre de gluten" el que está preparado únicamente con ingredientes que por su origen natural y por la aplicación de buenas prácticas de elaboración - que impidan la contaminación cruzada - no contiene prolaminas procedentes del trigo, de todas las especies de *Triticum*, como la escaña común (*Triticum spelta L.*), *kamut (Triticum polonicum L.)*, de trigo duro, centeno, cebada, avena ni de sus variedades cruzadas. (...)".

**BRAZIL**

Brazil agrees with the amendments.

**Committee on Fats and Oils**  
**Comité sur les graisses et les huiles**  
**Comité sobre Grasas y Aceites**

Appendix 2 “List of Acceptable Previous Cargoes” of the *Code of Practice for the Storage and Transport of Edible Fats and Oils in Bulk* (CAC/RCP 36–1987) (Amendments) (para. 60 Appendix IV).

*Comments of Costa Rica*

Costa Rica agradece y apoya las enmiendas a la lista de Cargas Anteriores Aceptables del Código de Prácticas para el almacenamiento y transporte de aceites y grasas comestibles a granel (CAC/RCP 36-1987) (párr. 60 y Apéndice IV) sin embargo por el momento no emite comentarios.

Reference to Acceptance / Voluntary Application in Codex Standards for *Edible Fats and Oils not Covered by Individual Standards* (CODEX STAN 19-1981); for *Named Vegetable Oils* (CODEX STAN 211-1999), for *Named Animal Fats* (CODEX STAN 210-1999) and for *Olive Oils and Olive Pomace Oils* (CODEX STAN 33-1981) (para. 63).

*Comments of Costa Rica*

Costa Rica agradece y apoya las enmiendas a las normas para grasas y aceites con respecto a la declaración sobre la aplicación voluntaria (párr. 63), sin embargo por el momento no emite comentarios.

**Committee on Methods of Analysis and Sampling**  
**Comité sur les méthodes d'analyse et d'échantillonnage**  
**Comité sobre Métodos de Análisis y Toma de Muestras**

*Comments of Peru*

**Observaciones generales:**

La Comisión Técnica Nacional en el marco del Codex Alimentarius no tiene comentarios al documento REP15/MAS, Reporte de la 36ª Sesión del Comité Codex de Métodos de Análisis y toma de Muestra.

**Específicas:** No hubo.

**Committee on Contaminants in Foods**  
**Comité sur les contaminants dans les aliments**  
**Comité sobre Contaminantes en los Alimentos**

Maximum levels for lead in fruit juices and nectars (excluding juices exclusively from berries and other small fruits), ready-to-drink; canned fruits (excluding berries and other small fruits); canned vegetables (excluding canned brassica, canned leafy vegetables and canned legume vegetables); berries and other small fruits (excluding cranberry, currant and elderberry); cranberry; currant; elderberry; brassica vegetables; legume vegetables; fruiting vegetables, cucurbits; fruiting vegetables, other than cucurbits (excluding fungi and mushrooms) (Draft and Proposed Draft) (paras 49 and 50, Appendix IV)

*Comments of Canada, Costa Rica and Singapore*

**CANADA**

General support.

**COSTA RICA**

Costa Rica apoya los niveles propuestos en los Trámites 8 y 5/8 (párrs. 49-50, Apéndice IV)”. Incluidos en el “*Anteproyectos y proyectos de niveles máximos de plomo en zumos (jugos) y néctares de fruta (excepto exclusivamente los de bayas y otros frutos pequeños), listos para el consumo; conservas de fruta (excepto de bayas y otros frutos pequeños); conservas de hortalizas (excepto de brasicáceas, hortalizas de hoja y legumbres); bayas y otros frutos pequeños (excepto arándanos, grosellas y bayas del saúco); arándanos; grosellas; bayas del saúco; brasicáceas; legumbres; hortalizas de fruto, cucurbitáceas; hortalizas de fruto distintas de las cucurbitáceas (excluidos los hongos y las setas)*”.

**SINGAPORE**

Singapore supports the reduction of lead in food in view that JECFA has withdrawn the PTWI of lead as it was no longer considered health protective. Fetuses, infants and young children are the most vulnerable group to lead exposure in terms of neurodevelopmental effects of lead. Singapore thus agrees with the recommended MLs of lead as follows to reduce dietary exposure to lead:

- a) Adoption of MLs for fruit juices and nectars (excluding juices exclusively from berries and other small fruits and passion fruit), ready-to-drink at 0.03 mg/kg; canned fruits (excluding berries and other small fruits) at 0.1 mg/kg; and canned vegetables (excluding canned brassica, canned leafy vegetables and canned legume vegetables) at 0.1 mg/kg at Step 8; and
- b) Adoption of MLs for berries and other small fruits (excluding cranberry, currant and elderberry) at 0.1 mg/kg; cranberry at 0.2 mg/kg; currant at 0.2 mg/kg; elderberry at 0.2 mg/kg; brassica vegetables at 0.1 mg/kg; legume vegetables at 0.1 mg/kg; fruiting vegetables, cucurbits at 0.05 mg/kg; fruiting vegetables, other than cucurbits at 0.05 mg/kg (excluding fungi and mushrooms) at Step 5/8.

Maximum levels for deoxynivalenol (DON) in cereal-based foods for infants and young children; in flour, meal, semolina and flakes derived from wheat, maize or barley; and in cereal grains (wheat, maize and barley) destined for further processing including sampling plans and performance criteria for methods of analysis (Draft) (para. 91, Appendix VI)

*Comments of Canada, Costa Rica, European Union and ISDI*

**CANADA**

General support. As noted at the 9<sup>th</sup> CCCF session, Canada is of the opinion that a previously recommended maximum level of 0.5 ppm DON in cereal-based foods for infants and young children is sufficiently health protective. Nonetheless, we do not express a reservation to the lower 0.2 ppm value. For the proposed draft 2.0 ppm DON maximum level for cereal grains (wheat, maize and barley), Canada is supportive of this value provided that it is clearly qualified that the maximum level applies to grains destined for further processing, meaning additional processing or treatments proven to reduce levels of DON could be applied and that Codex members could define the processes that have been shown to reduce levels. Canada supports the draft maximum level of 1.0 ppm for DON in flour, meal, semolina and flakes.

**COSTA RICA**

Costa Rica apoya los niveles propuestos en el Trámite 8 (párr. 91, Apéndice VI), incluidos en el “*Proyecto de niveles máximos para el deoxinivalenol (DON) en alimentos a base de cereales para lactantes y niños pequeños; en la harina, la sémola, la semolina y los copos de trigo, maíz o cebada; y en los cereales en grano (trigo, maíz y cebada) destinados a elaboración ulterior, incluido los planes de muestreo y criterios de rendimiento de los métodos de análisis*”.

**EUROPEAN UNION**

The European Union (EU) can support the adoption of the draft MLs for DON with the exception of the ML of 1 mg/kg for flour, meal, semolina and flakes derived from wheat, maize or barley for which the EU would like to reiterate its concerns already expressed at the CCCF Session.

The European Food Safety Authority (EFSA) has identified a potential public health risk caused by increased exposure to DON as a result of the draft ML, which is higher than the current ML applicable in the EU.

The overall conclusion of the EFSA risk assessment is that “The exposure estimations in this statement indicate that the group Health Based Guidance Values (HBGVs) are already exceeded by the parent compound DON in a number of cases. An increase of the DON ML can be expected to be associated with an increase of the levels of DON and Ac-DONs in barley flour, wheat flour and semolina, and can therefore increase the exposure and consequently the exceedances of the group HBGVs.”

Given this conclusion, the EU cannot agree on the draft maximum level of 1 mg/kg for DON in flour, semolina, meal and flakes derived from wheat, maize or barley. The EU requests that this reservation is included in the report of the CAC 38.

**INTERNATIONAL SPECIAL DIETARY FOOD INDUSTRIES (ISDI)**

In view of the CAC38 (Geneva – 6-10 July 2015), ISDI would like to submit the following comments on the draft maximum levels for deoxynivalenol (DON) in cereal-based foods for infants and young children.

The Fourth Session of the CCCF, held in Izmir (Turkey) in April 2010, decided to restart work on MLs for DON in cereal-based products. The eight session of the CCCF in The Hague (The Netherlands - 31 March – 4 April 2014) noted that it was not possible to reach agreement on the ML for cereal-based foods for infants and young children and agreed to hold the MLs at Step 7 for consideration at the 2015 session. This session also noted that outcomes of the 72nd JECFA meeting had concluded that 0.5 mg/kg for DON was sufficiently protective. The ninth session of CCCF in New Delhi (India - 16 - 20 March 2015), noting the wide support for the ML of 0.2 mg/kg **on a dry matter basis**, agreed that this ML could be sent for adoption to the Commission. However, some members drew attention of the Committee on the difficulties that some countries will face to manufacture infant cereals.

ISDI would like to highlight to the Commission the fact that it would be challenging for some countries to comply with the proposed ML. ISDI would therefore advise to accelerate the work and adoption of the Proposed Draft Revision of the *Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals*, which is currently under discussion at CCCF (step 5/8), including the development of practices for the prevention and control of DON in cereal grains in the annexes (step 2/3).

ISDI questions whether the lowering of the ML for DON in infant cereals to 0.2 mg/kg is universally achievable **immediately, even before the finalization and implementation of the Codex Code of Practice** and welcomes the opinion of the Commission and its member on this point. ISDI would like the Commission to consider the implementation of the 0.2 mg/kg ML only after the adoption of the Code of Practice is implemented.

#### References:

- Global occurrence of mycotoxins in the food and feed chain: facts and figures' by Schatzmayr and Streit (Wageningen - 2013) <http://bit.ly/1E6g7Ru>
- 'Mycotoxin occurrence in feed and feed raw materials worldwide: long-term analysis with special focus on Europe and Asia' by Elisabeth Streit, Karin Naehrer, Ines Rodrigues and Gerd Schatzmayra (Wiley Online Library - 26 June 2013) <http://onlinelibrary.wiley.com/doi/10.1002/jsfa.6225/abstract>
- JECFA 2011 DON risk assessment: [http://whqlibdoc.who.int/trs/WHO\\_TRS\\_959\\_eng.pdf](http://whqlibdoc.who.int/trs/WHO_TRS_959_eng.pdf)
- AACCI (American Association of Cereal Chemists) study on DON Occurrence in Grains: <http://www.aaccnet.org/initiatives/Documents/CFW-60-1-0032-EP.pdf>

**Committee on Food Additives**  
**Comité sur les additifs alimentaires**  
**Comité sobre Aditivos Alimentarios**

*Comments of Costa Rica and Singapore*

#### **COSTA RICA**

Costa Rica apoya los proyectos y anteproyectos de normas y textos afines en los trámites 8 o 5/8 del Procedimiento.

Food additive provisions of the *General Standard for Food Additives* (GSFA) (Draft and Proposed Draft) (paras 58, 81, 113, Appendix VII (Parts A – E)).

#### **SINGAPORE**

Singapore supports the adoption of the draft and proposed draft food additive provisions in the General Standard for Food Additives (GSFA) at Steps 8 and 5/8 respectively.

The proposed provisions for adoption include the addition of some organic acids into some fresh food categories, which is accompanied with the note 242 "For use as an antioxidant only" so as to alleviate concerns that the organic acids could be excessively used to provide preservative effects. In this regard, Singapore is of the view that it is important for new proposed provisions for the use of food additives in fresh food categories such as category 08.1 (Fresh meat, poultry and game), and category 09.1 (Fresh fish and fish products, including molluscs, crustaceans, and echinoderms), to be carefully considered by the CCFA in the future, taking into consideration whether such use could potentially result in the misleading of consumers with regard to the freshness and quality of these fresh food products, or cover up unhygienic practices.

**Committee on Residues of Veterinary Drugs in Foods**  
**Comité sur les résidus de médicaments vétérinaires dans les aliments**  
**Comité sobre residuos de medicamentos veterinarios en los alimentos**

MRLs for derquantel (sheep tissues), emamectin benzoates (salmon and trout tissues) and monepantel (sheep tissues) (Proposed Draft) (paras 70, 75 and 90, Appendix IV).

*Comments of Brazil*

Brazil supports the adoption by the 38<sup>th</sup> Session of the Codex Alimentarius Commission of the proposed Draft Maximum Residue Limits for Veterinary Drugs.

RMRs for dimetridazole, ipronidazole, metronidazole and ronidazole (Proposed Draft) (paras 92, Appendix VII).

*Comments of Brazil*

Brazil does not support the adoption by the 38<sup>th</sup> Session of the Codex Alimentarius Commission of the proposed Risk Management Recommendations (RMRs), as already stated during the 22<sup>nd</sup> Session of CCRVDF and expresses its reservation to the inclusion of the last sentence of the RMRs (“*This can be accomplished by not using [name of the compound] in food producing animals*”).

Brazil recognizes the importance of Codex RMRs based on JECFA’s risk assessment for substances with sufficient scientific data available to conclude that their use in food producing animals poses an unacceptable risk to human health. However, the recommendations as proposed, of a single risk management option, could be excessively restrictive and countries should be given the flexibility to determine which risk management options work best for them. This decision rests with national competent authorities, and not with CCRVDF. Codex mandate is to ensure food safety and facilitate fair trade practices, but there has to be a clear distinction between the role of Codex and the role of national competent authorities as risk managers.

**Committee on Sugars  
Comité sur les sucres  
Comité sobre Azúcares**

Standard for Non-centrifugated Dehydrated Sugar Cane Juice (Draft) (CL 2015/16-CS).

*Comments of Japan*

**General Comments**

Japan can support this draft Standard if the following amendment is accepted.

**Specific Comments**

With regard to Section 3.2.4 Physical and chemical characteristics, Japan would like to reiterate that proposed minimum value(4.5) for reducing sugars should be replaced with 1.5% or “--”.

The reasons are as follows:

1. Kokutou in Japan, to be defined as Non-Centrifugated Dehydrated Sugar Cane Juice fully conforms to “1. SCOPE” and “2. PRODUCT DEFINITION” of this draft Standard.
2. However, the range of reducing sugar content in Kokutou is 1.5%-4.0% by nature. For this reason, Kokutou doesn’t comply with this draft Standard.
3. Japan would like to insist that Codex Commodity Standard should be inclusive in order to be more acceptable for Members.

Requirement	COMPOSITION ON A DRY BASIS	
	Value	
	Minimum	Maximum
Ash (% m/m)	0.9	--
Saccharose (% m/m)	--	91
Reducing sugars (% m/m)	<b>4.5 [1.5 or “--”]</b>	--
Proteins in % (N X 6.25)	0.2	--

On the top of that, Japan would like to respond to para 11 of CL 2015/16-CS:

A low value of reducing sugar would be equivalent to having a product very similar to table sugar, whose constitution is different from the product under this draft standard.

Kokutou made by traditional manufacturing method contains no more than 4.5% reducing sugar and also contains rich minerals. Its appearance, taste and flavor are quite different from those of table sugar. Thus, Japan believes this draft Standard should be applicable to Kokutou.