

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

EXECUTIVE COMMITTEE OF THE CODEX ALIMENTARIUS COMMISSION

Fiftieth Session, FAO Headquarters, Rome, 26-28 June 2002

CONSIDERATION OF PROPOSED DRAFT STANDARDS AND RELATED TEXTS AT STEP 5

Comments received at Step 5

Background

1. The Uniform Procedure for the Elaboration of Codex Standards and Related Texts states that:

Step 5

The proposed draft standard is submitted through the Secretariat to the Commission or to the Executive Committee with a view to its adoption as a draft standard. In taking any decision at this step, the Commission or the Executive Committee will give due consideration to any comments that may be submitted by any of its Members regarding the implications which the proposed draft standard or any provisions thereof may have for their economic interests. In the case of Regional Standards, all Members of the Commission may present their comments, take part in the debate and propose amendments, but only the majority of the Members of the region or group of countries concerned attending the session can decide to amend or adopt the draft. In taking any decisions at this step, the Members of the region or group of countries concerned will give due consideration to any comments that may be submitted by any of the Members of the Commission regarding the implications which the proposed draft standard or any provisions thereof may have for their economic interests.

Comments received at Step 5

2. Comments received in relation the texts submitted at Step 5 are presented in the Annex to this document.

CCEXEC 50: Comments on texts at Step 5

20 June 2002

CCFAC *Codex Committee on Food Additives and Contaminants*

Deadline: 31 May 2002

Proposed Draft Code of Practice for the Prevention of Patulin Contamination in Apple Juice and Apple Juice Ingredients in Other Beverages

ALINORM 03/12, para. 122 and Appendix XI

No Comments

Proposed Draft Code of Practice for the Prevention (Reduction) of Mycotoxin Contamination in Cereals, Including Annexes on Ochratoxin A, Zearalenone, Fumonisin and Tricothecenes

ALINORM 03/12, para. 125 and Appendix XII

No Comments

Proposed Draft Revisions to the International Numbering System (INS) for Food Additives (Mineral Oil – INS 905)

ALINORM 03/12, para. 97 and Appendix VII

No Comments

CCFH *Codex Committee on Food Hygiene*

Deadline: 01 March 2002

Proposed Draft Revised Guidelines for the Application of HACCP System: application in Small and/or Less Developed Businesses

ALINORM 03/13, Appendix III

Thailand

Thailand generally agrees with these two documents but would like to request CCFH to recognize the difficulties of SLDBs in some countries in implementing all seven principles of HACCP system.

In Thailand, for example, there are some kinds of multi-products businesses with considerably varying nature of food preparation as well as food servicing process such as street food vendors or small servicing food businesses (e.g. small food shops or restaurants). For these businesses, food preparation can be wholly cooked, partially cooked or only mixed various ingredients together without heating. The serving, moreover, can be in place or take-home. It is difficult, therefore, for these kinds of businesses to establish the critical limits and critical control points. In certain cases, only visual inspection can be used as monitoring and there are not sufficient data and technical information to set the corrective actions. Data recording and verification is not feasible for such businesses.

In our opinion, it would be appropriate to encourage these kinds of businesses to implement firstly only some principles of HACCP system and when their systems are gradually improved and more experiences are gained, the whole HACCP system will be implemented.

In this connection, Thailand would like to propose the addition of the following paragraph to the Proposed Draft Revised Guidelines for the Application of HACCP system (ALINORM 03/13 Appendix III). The new paragraph can come before the section "Application" as follows.

"However, for small and less developed businesses with considerably varying nature of food preparation and servicing process some steps of HACCP principles such as data recording and verification may not be applied. Other alternative food safety measures should be considered.

CCFL *Codex Committee on Food Labelling*Deadline: 15 June 2002

Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods: Proposed Draft Sections : Section 5 – Criteria

ALINORM 03/22, para.24 and Appendix II

No Comments**Proposed Draft Amendment to the Guidelines on Nutrition Labelling**

ALINORM 03/22, para.81 and Appendix VI

No Comments**Proposed Draft Guidelines for Use of Health and Nutrition Claims**

ALINORM 03/22, para.91 and Appendix VII

ISDI

Section 1.4 of the Scope is not relevant and should be deleted. Codex standards describing these food categories are under revision at CCNFSDU. It is the task of CCNFSDU to consider the question of claims for foods for infants and young children.

"Food for Special Medical Purposes" should be removed from section 1.2 since they are, by definition, Foods for Special Dietary Uses.

Rationale:

In November 2001, Codex Committee on Nutrition and Food for Special Dietary Uses (CCNFSDU) has asked the Committee on Food Additives and Contaminants to defer finalization of these levels (of additives) until the CCNFSDU had carried out a thorough review of the current additives in the standards for foods for infants and children.

This request was taken into account by the Committee on Food Additives and Contaminants (CCFAC) in March 2002 since, as reminded by Codex Secretariat, technological justifications should be provided by Commodity Committees for endorsement by CCFAC (horizontal Committee) who will also evaluate the safety aspects of the provisions.

On the same grounds, CCFL shall not adopt provisions on claims specific to foods for infants and young children until CCNFSDU has discussed this matter in details. Indeed, CCNFSDU is the relevant Committee to tackle the way information on foods for infants and young children can be provided to parents and health workers.

CCGP *Codex Committee on General Principles*Deadline: 30 May 2002

Proposed Draft Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius

ALINORM 03/33, para. 63 and Appendix II

Canada

Canada is pleased with the progress made by the 17th Session of the Codex Committee on General Principles and supports the adoption of the "Proposed Draft Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius" at Step 5.

CCMMP *Codex Committee on Milk and Milk Products*

Deadline: 31 May 2002

Proposed Draft Standard for [Evaporated Skimmed Milk with Vegetable Fat / Blend of Evaporated Skimmed Milk with Vegetable Fat]

ALINORM 03/11, Appendix IX, para. 111

Ireland

Description: The recombining process as stated should be amended to include the addition of vegetable fat.

General Comment: Given that the products described in Appendix VIII are essentially sweetened versions of those in Appendix IX, perhaps the two proposed Draft Standards could be combined into one.

United States

The U.S. supports the adoption of the draft Standard at Step 5.

Proposed Draft Amendments to Section 3.3 “Composition” of the Codex General Standard for Cheese

ALINORM 03/11, Appendix V, para 79

Ireland

The text as proposed does not rule out the use of protein standardisation prior to cheese manufacture. As a consequence the protein content of the milk used in the cheese making process could be reduced to a lower level than that in the milk at the time of milking.

It is therefore necessary to amend the text to say that the protein content of the cheese should be distinctly higher than the protein level of the milk at the time of milking.

United States

The U.S. supports the adoption of the draft Standard at Step 5.

Proposed Draft Standard for [Sweetened Condensed Milk with Vegetable Fat / Blend of Sweetened Condensed Milk with Vegetable Fat]

ALINORM 03/11, Appendix VIII, para. 111

Ireland

Description: The recombining process as stated should be amended to include the addition of vegetable fat.

United States

The U.S. supports the adoption of the draft Standard at Step 5.

Proposed Draft Standard for [Skimmed Milk Powder with Vegetable Fat / Blend of Skimmed Milk Powder with Vegetable Fat]

ALINORM 03/11, Appendix X, para. 111

Ireland

Taking into consideration the eligible ingredients and the nature of the manufacturing process i.e. blending evaporated milk solids with vegetable fat and then drying the resulting blend, perhaps a more appropriate name for the Draft Standard would read "Proposed Draft Standard For a [Blend of Milk Solids and Vegetable Fat in Powder form]".

Accordingly the sections on Scope and Description would also require amendment to reflect the change in the name of the Standard.

General Comment: The Scope should be expanded to include sweetened products.

United States

The U.S. supports the adoption of the draft Standard at Step 5.

CCMPH Codex Committee on Meat and Poultry Hygiene

Deadline: 31 May 2002

Proposed Draft General Principles of Meat Hygiene

ALINORM 03/16, Appendix II

Germany

General Principle 5

Replace in footnote 3 after the first sentence the full stop by a colon and add before the words "Food Safety Objective" a quotation mark.. This is necessary to improve readability.

General Principle 8

Add after the words "quality assurance system" the abbreviation "(QA)", because it is used in the following text.

General Principle 12

Other than the results of the 8th Session of the Codex Committee on Meat and Poultry Hygiene the words "where available" were added after "results of monitoring and surveillance of animal and human po-pulations". These words should be deleted, as they are dispensable. Only if the results mentioned are available, they can be taken into account.

New Zealand

In relation to principle 11, second sentence, we suggest that this sentence could be reworded as: "Communication with consumers and other interested parties should be considered and undertaken where appropriate."

Proposed Draft General Principles of Meat Hygiene

ALINORM 03/16, Appendix II

United States

Principle 1: The U.S. has no objection to use of the term "suitable for human consumption" with the understanding that its meaning ensures that meat is processed under sanitary conditions, and meats meat hygiene standards established by the competent authority for processing defects and gross pathology that could make meat unsuitable for human consumption even though it might be safe. The term does not encompass production practices employed to meet preferences by individual countries (e.g., safe use of growth hormones in cattle).

Principle 2: The 2nd sentence should be amended to invert the words "...suitable, and..."

New wording: "It should be the responsibility of the establishment operator to produce meat that is safe and suitable in accordance with regulatory meat hygiene requirements."

Rationale: A competent authority cannot require an establishment operator to produce meat that is safe and suitable outside regulatory meat hygiene requirements.

CCPR Codex Committee on Pesticide Residues

Deadline: 15 June 2002

Proposed Draft MRLs for Captan, Chlormequat, Chlorpyrifos, DDT, Malathion, Parathion, Parathion-methyl, Pyrethrins, Thiabendazole

ALINORM 03/24, Appendix III

No Comments**Proposed Draft Revised Guidelines on Good Laboratory Practice in Pesticide Residue Analysis**

ALINORM 03/24, Appendix VI

No Comments

CCRVDF Codex Committee on Residues of Veterinary Drugs in Foods

Deadline: 15 April 2002

**Proposed Draft Maximum Residue Limits for Veterinary Drugs :
Clenbuterol, Deltamethrin Dicyclanil, Melengestrol acetate, Trichlorfon
(Metrifonate)**

ALINORM 03/31, Appendix V

Czech Republic

As regards the Proposed Draft Maximum Residue Limits for clenbuterol, deltamethrin, dicyclanil, melengestrol acetate and trichlorfon we agree with submitted proposal.

USA

The U.S. supports the adoption of all permanent MRLs now at step 5. The U.S. notes that the temporary MRLs for melengestrol acetate in cattle liver and fat were finalized by the 58th JECFA. The United States supports adoption of these MRLs. The U.S. also supports the adoption of the temporary MRL for trichlorfon (metrifonate) at step 5. The U.S. notes that trichlorfon is scheduled for re-evaluation by JECFA at its 60th meeting in February 2003. Commitments have been made to provide JECFA with the data needed to re-evaluate the toxicity of trichlorfon.

**Proposed Draft Maximum Residues Limits for Veterinary Drugs :
Clenbuterol, Deltamethrin Dicyclanil, Melengestrol acetate, Trichlorfon
(Metrifonate)**

ALINORM 03/31, Appendix V

EC

The European Community would like to make the following comments :

The MRLs proposed for clenbuterol for tissues at step 5 are higher than those established in the European Union (0.2 µg/kg compared to 0.1 µg/kg for muscle, 0.6 µg/kg compared to 0.5 µg/kg for liver and kidney). The total residues would amount to 101 % of the ADI using the values proposed by JECFA.

For the substances trichlorfon (metrifonate) and flumequine certain data will be submitted to JECFA by the European Agency for the Evaluation of Medicinal Products (EMEA).

Editorial comment :

In Annex V metrifonate is spelt incorrectly.
