

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3, 4, 5, 6, 7, 8, 9, 11, 20.2

CAC/39 CRD/17

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

39th Session

FAO Headquarters, Rome, Italy, 27 June – 1 July 2016

(Comments of Tanzania)

CCNFSDU: CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Agenda item 3

Proposed Draft Additional or Revised Nutrient Reference Values for Labelling Purposes in the Guidelines on Nutrition Labelling: NRV-R for Copper, Iron (dietary description and footnote), Magnesium, Phosphorus, Vitamin E and Vitamin A (dietary equivalents and conversion factors), at Step 5/8 (para. 52a), Appendix II, Part I).

Recommendation 1: NRV-R for Vitamin A

Tanzania supports adoption of NRV-R as 800 µg and based on IOM for Vitamin A because the proposed level is safe to the population and that such level will complement the efforts for Vitamin A deficiency management in the region. The physiological benefits of Vitamin A is in relation to body immunity and in vision. Vitamin A contributes to reduction of mortality in children under five years of age.

Recommendation 4: NRV-R for Vitamin E

Tanzania supports the recommendation by the committee to establish a NRV-R of 9 mg and based equally on Nordic Council, and average of EFSA, NHRMC/MOH, NIH/N, WHO/FAO (all AIs). This is because Vitamin E is an important antioxidant in the body and the proposed levels are physiologically adequate for its function.

Recommendation 5: NRV-R for Iron

Tanzania supports the adoption of the revised NRVs of 14 mg for iron from animal source (15% of absorption) and 22 mg for iron from vegetable source (10% of absorption) according to the level of absorption. This is because quality of absorption of iron and zinc depends on the source (Animal sources are better absorbed as compared to plant sources e.g. the heme and non-heme iron.)

Recommendation 6: Dietary Description for Iron

Tanzania supports adoption of the agreed dietary descriptions adapted from WHO/FAO (2006) that correspond to the selected NRVs-R. This is because quality of absorption of iron and zinc depends on the source (Animal sources are better absorbed as compared to plant sources e.g. the heme and non heme iron.)

Recommendation 8: NRV-R for Magnesium

Tanzania supports revision of the NRV-R for Magnesium from 300 mg to 310 mg and based on average of IOM, NIH/N, WHO/FAO ± Nordic Council (INL98 ± RI). This is because Magnesium is an important mineral in the normal functioning of body muscles including the heart and therefore the proposed level will support this function especially with the increased cardiovascular complications.

Recommendation 9: NRV-R for Phosphorus

The committee agreed to establish a NRV-R of 700 mg and based on IOM. Further the committee adopted a higher value of 700 mg despite there no being a supporting scientific reason as is the case for 550 mg related to the absorption ratio. Three African countries, Senegal, Mali and Togo expressed their reservation on this decision of the committee.

Tanzania supports adoption of the standard with the reservation. This is because it is important to consider absorption of phosphorus, a Ca:P ratio of 2:1 is optimal and will ensure that both Calcium and Phosphorus are well absorbed in the body.

Recommendation 10: NRV-R for Copper

Tanzania supports adoption of NRV-R of 900 µg for Copper and based on IOM. This is because Copper is important element in the body coenzymes and this level is both safe and efficacious.

Recommendation 13: Vitamin A Dietary Equivalents and Conversion Factors

Tanzania supports the adoption of recommendations as proposed by the committee as follows: inserts an entry for vitamin A in the second table to paragraph 3.4.4.1 of the Guidelines on Nutrition Labelling, include both RAE (Retinol activity equivalent) and RE (retinol equivalent) and their conventional conversion factors as alternative dietary equivalents for Vitamin A occurring naturally in food as discussed in section 4.1, include two principal forms of retinol that are added to food as shown in section 4.2 and delete the * currently attached to vitamin A NRV-R and related footnote relating to declaration of β-carotene. This will allow comparison of various forms of Vitamin A and same interpretation of results.

The NRV-R for Vitamin D and the dietary equivalents and conversion factor for Vitamin E (para. 52b and Appendix II, Part III).**Recommendation 14: Vitamin E Dietary Equivalents and Conversion Factors**

Tanzania supports postponement of the decision until when a possible consensus can be reached on the following aspects: insert an entry for vitamin E in the second table to paragraph 3.4.4.1 of the Guidelines on Nutrition, labelling, include α-tocopherol as the active form of vitamin E occurring naturally in food as shown in section 4.3 and include three common forms of vitamin E that are added to food as shown in section 4.4. This will allow comparison of various forms of Vitamin A and same interpretation of results.

Draft standards and related texts at step 5/8 of the procedure: Amendments to the Annex of the Guidelines on Nutrition Labelling (CAC/GL2-1985) (para. 52a), Appendix II, Part II);

Tanzania supports adoption of the amendments to the Annex because the footnote as amended will add clarity to the table and ensure consistency in the guidelines and enhances common understanding for the terminology.

Amendments to Section 10, Methods of analysis in Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (CODEX STAN 72-1981) to refer to Recommended Methods of Analysis and Sampling (CODEX STAN 234-1999) (para. 96, Appendix V, Part II).

Tanzania support the alignment of the proposed draft standard of the various nutrients in line with the provisions provided in the infant formula in order to ensure that only physical means are employed during processing.

Agenda item 6**Approval for New work - Guideline for Ready to Use Therapeutic Food” (RUTF) (paras 87-88 and Appendix IV)**

Tanzania supports the development of a Codex guideline rather than a Codex Standard. This is because we recognize the important role of RUTF in the management of SAM (Severe Acute Malnutrition), however, to ensure sustainability and acceptance, these products should to the much extent possible be based on locally available foods mainly due to cultural preferences in foods and normal feeding patterns. In addition, a guideline will assist the governments as an advisory document to develop appropriate strategies especially in the management of SAM but also putting in place mechanism to prevent their occurrence through appropriate feeding practices. Current RUTF are costly and not affordable compared to local foods.

CCFH: CODEX COMMITTEE ON FOOD HYGIENE**Agenda item 3****Matters for Adoption by CAC39 at Step 5/8****Proposed draft Guidelines for the Control of Non-typhoidal Salmonella spp. in Beef and Pork Meat (para. 22 and Appendix II);**

Tanzania supports adoption of the proposed draft guidelines for the Control of Non-typhoidal Salmonella spp. in Beef and Pork Meat at Step 5/8 (with the omission of Step 6/7) on reason that the document has been extensively discussed at PWG with no outstanding issues; Comprehensive, user friendly and addresses key issues of food safety. Hazard-based and GHP-based control measures for nontyphoidal *Salmonella* Spp have been adequately addressed to protect public health and safety.

Proposed draft Guidelines on the Application of General Principles of Food Hygiene to the Control of Foodborne Parasites (para. 30 and Appendix III)

Tanzania supports adoption of the proposed draft guidelines on the Application of General Principles of Food Hygiene to the Control of Foodborne Parasites at Step 5/8 (with the omission of Step 6/7). This is because extensive discussions and consensus were reached by EWG and plenary (CCFH47) and there are no outstanding issues.

Proposed draft Annex I “Examples of Microbiological Criteria for Low-Moisture Foods When Deemed Appropriate in Accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CAC/GL 21-1997)” and Annex II “Guidance for the Establishment of Environmental Monitoring Programs for Salmonella spp. and other Enterobacteriaceae in Low-Moisture Food Processing Areas” to the Code of Hygienic Practice for Low-Moisture (para. 41 and Appendix IV).

Tanzania supports adoption of the proposed draft annexes (annex 1 and II) at Step 5/8. Because all comments have been addressed and no further outstanding issues.

Proposed draft Annex III “Spices and Dried Aromatic Herbs” to the Code of Hygienic Practice for Low Moisture (para. 41 and Appendix IV).

Tanzania supports adoption of the proposed text on Annex III (Spices and dried aromatic herbs) because the document is now an Annex to the Code of Hygienic Practice for LMF.

Agenda item 5**Code of Hygienic Practice for Spices and Dried Aromatic Herbs (CAC/RCP 42-1995) (para. 40b).**

Tanzania supports the revocation of the Code of Hygienic Practice for Spices and Dried Aromatic Herbs (CAC/RCP 42-1995) on account of its inclusion as an Annex to the Code of Hygienic Practice for Low-Moisture Foods. This is because the Codes of Practice will be adopted in the future.

Agenda item 6**Revision of the General Principles of Food Hygiene (CAC/RCP 1-1969) and it’s HACCP Annex (para. 45(c) and Appendix V)**

Tanzania supports the approval of this new work by CAC39. The revised document will provide comprehensive guidance to small and medium enterprises since its application will address food safety challenges, enhance international trade in food and provide consumer protection. The development of one document covering GHP and HACCP as two parts will ensure that all the relevant concepts, requirements, steps and figures are captured in one single document making it user-friendly.

Revision of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) (para. 46(b) and Appendix VI).

Tanzania supports the approval of this new work by CAC39 in order to restructure it and include new definitions, specific provisions regarding hygiene in the environment and cleaning programs. The objective and the scope need to be expanded to include provision throughout the food chain from "primary production to consumer" as well as to accommodate the inclusion of specific provisions from the Annexes.

CCFA: CODEX COMMITTEE ON FOOD ADDITIVES**Agenda item 3****Draft and proposed draft Standards and Related Texts for adoption at Steps 8 or 5/8: Proposed draft Specifications for the Identity and Purity of Food Additives (para. 30(i) and Appendix III, Part A);**

Tanzania supports the recommendations of JECFA on food additives Advantame (R) (INS 969), Annatto extracts (solvent extracted bixin) (R) (INS 160b(i)), Annatto extracts (solvent extracted norbixin) (R) (INS 160b(ii)), Calcium silicate (R) (INS 552), Lipase from *Fusarium heterosporum* expressed in *Ogataea polymorpha* (N) (INS 1104), Magnesium stearate (N) (INS 470(iii)), Maltotetraohydrolase from *Pseudomonas stutzeri* expressed in *Bacillus licheniformis* (N) and Polyvinyl alcohol (PVA) polyethylene glycol (PEG) graft copolymer (N) (INS 1209). This is because the evaluation by JECFA was science-based and the revocation was based on the withdrawal of specifications.

Draft and proposed draft food additive provisions of the General Standard for Food Additives (GSFA) (para. 98(i) and Appendix VII, Parts A-F);

Tanzania supports the proposed draft provision for use of Nisin at 25 mg/kg in food category 08.3.2 as a preservative at ML of 25mg/kg and of lauric arginate ethyl ester and their use in corresponding standards CODEX STANs 89-1981 and 98-1981 and CODEX STAN 88-1981. This is because Nisin is an important preservative as it inhibits growth of spoilage and pathogenic microorganization: i.e. lactic acid, *Pseudomonas* spp., *Escherichia Coli*, *Listeria monocytogenes*, *Staphylococcus aureus*, and *Salmonella enteridis* and the spore forming bacteria, *Bacillus* and *Clostridium*, thereby helping to increase food safety.

Proposed draft revision of food category 01.1 “Milk and Dairy Based Drinks” (renamed “Fluid milk and milk products”) and its sub-categories and consequential changes (para. 87 and Appendix XII);

Tanzania supports the adoption at Step 5/8 (with omission of Steps 6/7) of the revised titles and descriptors of food categories 01.1, 01.1.1, 01.1.3, 01.1.4, that have included a new food category 01.1.2 “Other fluid milks (plain)” and plain drinks based on fermented milk in food category 01.2.1 “Fermented milks (plain)” as they share the same food additive provisions according to the Standard for Fermented Milks (CODEX STAN 243-2003). This is because they are addressing the inconsistencies and concerns raised on reconstituted plain milk and other plain milk products.

Proposed draft amendments to the International Numbering System for Food Additives (para. 110 and Appendix XIII); and - Proposed draft Revision of Sections 4.1.c and 5.1.c of the General Standard for the Labelling of Food Additives When Sold as Such (CODEX STAN 107-1981) (para. 155 and Appendix XV).

Tanzania supports the proposal to adopt at Step 5/8 (with omission of Steps 6/7) the changes and/or additions to the INS list and the assignment of INS numbers for the specific proteases for which no corresponding INS had been set; Spirulina extract (INS 134) – *Colour*, Purple sweet potato colour (INS 163(vii)) – *Colour*, Red radish colour (INS 186(iii)) – *Colour*, Protease from *Streptomyces fradiae* (INS 1101(v)) – *Flour treatment agent, flour enhancer, Stabilizer*, Proteases from *Bacillus subtilis* (INS 1101(Vi)) - *Flour treatment agent, flour enhancer, Stabilizer*, Change to existing names and INS numbers: Protease from *Aspergillus oryzae*. Var.(INS1101(i)) - *Flour treatment agent, flour enhancer, Stabilizer*; changes to functional classes and technological purposes for existing additives: Polyvinyl alcohol (PVA)-polyethylene glycol (PEG) graft copolymer (INS1209) – *Glazing agent, Stabilizer*.

Revised food additive sections of the standards for Cocoa Butter (CODEX STAN 86-1981), Chocolate and Chocolate Products (CODEX STAN 87-1981), Cocoa (Cacao) Mass (Cocoa/Chocolate Liquor) and Cocoa Cake (CODEX STAN 141-1983) and Cocoa Powders (Cocoas) and Dry Mixtures of Cocoa and Sugars (CODEX STAN 105-1981) (para. 52(i), a) and Appendix V);

Tanzania supports adoption of Cocoa Butter (CODEX STAN 86 -1981), Chocolate and Chocolate Products (CODEX STAN 87-1981), Cocoa (Cacao) Mass (Cocoa/Chocolate Liquor) and Cocoa Cake (CODEX STAN 141-1983) and Cocoa Powders (Cocoas) and Dry Mixtures of Cocoa and Sugars (CODEX STAN 105-1981)

For cocoa butter, no food additives are permitted; For chocolate and chocolate products, Cocoa (Cacao) Mass (Cocoa/Chocolate Liquor) and Cocoa Cake, and Cocoa Powders (Cocoas) and Dry Mixtures of Cocoa and Sugars only those food additives as provided by the GSFA are allowed (all current food additives are removed) and flavourings are to be used as per the Guidelines for use of Flavourings (CAC/GL 66-2008);

Revised food additive provisions of GSFA related to the alignment of the four commodity standards for chocolate and chocolate products and the commodity standards identified by the Committee on Fish and Fishery Products (CCFFP) (para 52(i), b) and Appendix VII, Part G and H);

Tanzania supports adoption of the revised food additive provisions of GSFA related to the alignment of the four commodity standards for chocolate and chocolate products and for the commodity standards on Fish and Fishery Products (CCFFP). The proposal is to amend the food additive provisions in Table 2 of the GSFA: FC 09.2 Processed fish and fish products, including mollusks, crustaceans and echinoderms; AND FC 09.2.5 Smoked, dried, fermented, and/or salted fish and fish products, including mollusks, crustaceans and echinoderms. This is because it is the result of the revised food additives section of the CODEX STAN 86-1981, CODEX STAN 87-1981, CODEX STAN 141-1983 and CODEX STAN 105-1981 and Tables 1, 2 and 3 of the GSFA related to the alignment of the four commodity standards were corrected. Further, Tables 1 and 2 of the GSFA were amended whereby New notes and new food additives for Cocoa mixes (powder) and Cocoa mass/cake. The Notes are with respect to the specific food additive. **Note 22:** For use in smoked fish products only. For use in non-standardized smoked fish products only as defined in section 1 of the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013). **XS311:** Excluding products conforming to the Standard for Smoked Fish, Smoked-flavoured Fish and Smoke-dried Fish (CODEX STAN 311-2013).

Agenda item 8**Amendment to the Standard for Dairy Fat Spreads (CODEX STAN 253-2006) (paras 153).**

Tanzania supports the amendment to this standard by deleting the term “flavour” as it appears only once in the document. This will make it user friendly

Agenda item 5**Revocation of Food Additive Provisions in Commodity Standards**

Tanzania supports the amendment to Aluminium silicate (INS 559) in Table 1 and 2 of the GSFA (FC 05.3), Calcium aluminium silicate (INS 556) in Table 1 and 2 of the GSFA (FCs 01.5.1, 01.5.2 and 05.3) and in the Standards for Milk Powders and Cream Powder (CODEX STAN 207-1999); a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CODEX STAN 251-2006); and Edible Casein Products (CODEX STAN 290-1995) and Glycerol ester of gum rosin (INS 445(i)). This revocation is automatic following the revision to the commodity standards.

Revocation of Food Additive Provisions in the GSFA

Tanzania supports the amendments for Aluminium silicate (INS 559) in Table 1 and 2 of the GSFA (FC 05.3); Calcium aluminium silicate (INS 556) in Table 1 and 2 of the GSFA (FCs 01.5.1, 01.5.2 and 05.3) and in the Standards for Milk Powders and Cream Powder (CODEX STAN 207-1999); a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CODEX STAN 251-2006); Edible Casein Products (CODEX STAN 290-1995), revoke Potassium bisulfite (INS 228) from the listing of sulphite in Table 1 and 2 the GSFA; from the food additives section of four standards; and from the Standard for Instant Noodles (CODEX STAN 249-2006) because it was no longer be supported by the sponsor (Appendices VI, Part B and VIII, Part B); remove calcium hydrogen sulfite (INS 227) from the GSFA (list of sulfites in Table 1) and remove potassium hydrogen sulfate (INS 515(ii)) from Table 3 of the GSFA (Appendix VIII, Part B). The revocation is as a result of consistency with the GSFA and commodity standards. Also removal of INS 227 and INS 515 (ii) is meant to bring consistency with the decisions taken by CCFA45 (ref. REP13/FA para. 16)

CCFFV: CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES**Agenda item 3: Proposed draft Standard for Aubergines for adoption at Step 5/8 (with omission of Step 6/7) (para 51 and Appendix III)**

Tanzania supports adoption of the proposed draft standards at step 5/8 because allowances for decay, soft rot and/or internal breakdown in the three quality classes i.e. “Extra” Class, Class I and Class II are necessary for the realistic application of the standard in international trade, inclusion of allowances for decay, soft rot and/or internal breakdown in the three quality classes reflects current industry and trade practices for international trade of fresh fruits and vegetables, the proposed tolerances for decay, soft rot and/or internal breakdown of 1% in “Extra” Class and 1% in Class I applies to different percentages of tolerances for the whole lot i.e. 5% of produce not satisfying the requirements of “Extra” Class and 10% of produce not satisfying the requirements of Class I respectively and therefore, there was a distinction between the allowances for decay in “Extra” Class and Class I, fresh fruits and vegetables are perishable produce subject to long distance transportation and storage, which may result in a certain degree of decay mainly due to enzymatic reactions in the produce that should not lead to the rejection of the lot, minimum tolerances for decay are a common industry and trading practice, however, the absence of such tolerances in an international standard like Codex would imply “zero” defect is the acceptable norm and this could create technical barriers to trade while the objective of Codex standards is to facilitate trade in food and that phytosanitary and food safety rules will always overrule agricultural quality standards especially when the tolerated decay is mainly caused by inherent enzymatic reactions (and some non-pathogenic micro-organisms) and **not** pathogenic microbial reactions.

Agenda item 4: Proposed draft Standards for Garlic and Kiwifruit for adoption at Step 5 (paras 70, 76 and Appendices IV and V respectively).

Tanzania supports adoption of the proposed draft standards for Garlic and Kiwifruit at Step 5.

Agenda item 6: Tanzania supports approval of new work on a standard for fresh date (para 96).

CCFFP: CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS**Agenda item 3:**

Tanzania supports adoption of the proposed draft standard on code of practice for fish and fishery products at step 8 with inclusion of (i) fish sauce (para. 18, Appendix III); (ii) fresh and quick frozen raw scallop products (para. 24, Appendix IV); and (iii) sturgeon caviar (para. 29, Appendix VI) because housing all standards in one source will help to be more user friendly. Also there was lack of scientific data to support our previous position that Biogenic amines and volatile amines are more representative of potential hazards than the use of histamine only.

Tanzania supports the recommendation by the Committee not to approve the Sampling plans (para. 8) and amendments to the food additive provisions of several standards for fish and fishery products (para. 56, Appendix VI); (ii) Section 7.4. but request CCMAS to elaborate simpler guidelines that include sampling plan. This is because of the noted difficulties to understand and use.

Agenda item 7:

Tanzania supports adoption of the amendment to Section 11: Processing of salted and dried salted fish of the Code of Practice for Fish and Fishery Products (CAC/RCP 52 – 2003) (Appendix VI), to discontinue work on Appendices 1-11 to the *Code of Practice for Fish and Fishery Products* (CAC/RCP 52 – 2003), to continue further work on proposal received on improvement for colour analysis and texture defects and to follow up work on the elaboration of standards on MAP for fish products as it will require inputs of different Committees

Agenda item 6

Tanzania supports proposal for new work on specific guidance on histamine control in the Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003) and sampling plans for histamine in relevant standards for fish and fishery products (para. 72).

CCRVDF: CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS**Agenda item 3: Proposed draft MRLs for recombinant Bovine somatotropin (rbST) for adoption at step 8 by CAC39**

Tanzania supports adoption of rbST at Step 8 following the review of the report based on the questions forwarded to JECFA 78 by CAC35. This is because based on a systematic review of the literature published since the last evaluation, JECFA reaffirmed its previous decision on the ADI “not specified” for somagrove, sometribove, somavubove and somidobove. Following are questions forwarded by the 35th CAC to JECFA on rbST Matters which in our opinion have been adequately addressed:

- **Update the toxicological evaluation:** No new toxicological studies were available. Owing to structural differences between bovine and human somatotrophins, species-specific receptor binding of somatotrophins and lack of bio-activity of rbSTs following oral intake, the Committee concluded that if any rbST residues are present in milk or tissues, they would pose a negligible risk to human health.
- **Update the exposure assessment based on any new occurrence data in food:** The Committee concluded that similar concentrations of total bST were present in milk and tissues of rbST-treated and untreated cows.
- **Consider new data and information related to the possibility of increased levels of IGF-I in the milk of cows treated with rbSTs:** There is a transient increase in IGF-I concentrations in milk of rbST-treated cows, which fall within the normal physiological range. IGF-I is substantially, if not completely, degraded in the gut and is unlikely to be absorbed from the gut and be bio-available at biologically relevant exposures. Therefore, the contribution of exogenous IGF-I resulting from the ingestion of milk from rbST-treated cows is extremely low in comparison with endogenous production.
- **Evaluate potential adverse health effects, including the possibility that exposure of human neonates and young children to milk from rbST-treated cows increases health risks (e.g. the development of insulin-dependent diabetes mellitus):** Exogenous IGF-I from milk makes no significant contribution to circulating levels of IGF-I in humans, and there are no significant differences in the composition of milk from rbST treated cows when compared with the milk from untreated cows. The Committee concluded that there was no additional risk for the development of type 1 diabetes due to the consumption of milk from rbST-treated cows.
- The Committee also concluded that the literature did not support a link between exposure to IGF-I in milk from rbST-treated cows and an increased risk of cancer.

- **Consider new data and information related to the potential effects of rbSTs on the expression of certain viruses in cattle:** There was no new information on the link between rbST use and either potential stimulation of retrovirus expression or prion protein expression in cattle. The Committee considers that the position expressed by the previous Committee remains valid.
- **Consider new data and information related to the possible increased use of antimicrobials to treat mastitis in cows and aspects of antimicrobial resistance associated with the use of rbSTs in relation to human health:** The Committee concluded that there was no evidence to suggest that the use of rbSTs would result in a higher risk to human health due to the possible increased use of antimicrobial agents to treat mastitis or the increased potential for non-compliant antimicrobial residues in milk. The Committee found no specific studies linking the use of rbSTs with the development of antimicrobial resistance. The Committee considers that the previous position remains valid.

CCCF: CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Agenda item 3:

Maximum level for inorganic arsenic in husked rice at Step 8 (para. 45, Appendix II);

Tanzania supports adoption of the compromise ML value of 0.35 mg/kg for inorganic arsenic in husked rice. This is because rice is a major staple food in several African countries and protection of human health is of utmost importance. It should however be noted that ML established may affect availability of rice significantly. From this point of view, it is not appropriate to allow a high violation rate.

Maximum levels for lead in fruit juices and nectars, ready-to-drink (inclusion of passion fruit); canned fruits (inclusion of canned berries and other small fruits); canned vegetables (inclusion of canned leafy vegetables and canned legume vegetables); jams, jellies and marmalades (lower ML and inclusion of marmalades); pickled cucumbers (lower ML); preserved tomatoes (lower ML and note on the application of a concentration factor); and table olives (lower ML) at Steps 5/8 (para. 89, Appendix III);

Tanzania supports adoption of lowering the standard on lead. This is because lead is an important contaminant in addressing human health.

Revised Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003) (general provisions) and its annexes on zearalenone, fumonisins, ochratoxin A, trichothecenes and aflatoxins, at Steps 8 and 5/8 (specific provisions) (paras. 124 and 128, Appendix IV).

Tanzania supports the adoption of a revised Code of practice.

Proposed draft Annexes on zearalenone, fumonisins, ochratoxin A, trichothecenes and aflatoxins (specific provisions) at Step 8 and Step 5/8 respectively (paras. 124 and 128, Appendix IV)

Tanzania supports adoption of the proposed draft annexes on zearalenone, fumonisins, ochratoxin A, trichothecenes and aflatoxins (specific provisions). The Annexes submitted to CCCF9 were returned for further development and comment at step 2/3, particularly for new developments related to deoxynivalenol (DON). These issues are of particular interest to the African situation and the development of Annexes should include the latest information available on mycotoxin control.

Agenda item 5 Revocation of standards

Tanzania supports revocation of the MLs in the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) for the listed products i.e. canned raspberries; canned strawberries; canned green beans and canned wax beans; canned green peas; jams (fruit preserves) and jellies; pickled cucumbers; preserved tomatoes; and table olives; and to delete the note on the adjustment of the ML for preserved tomatoes to take into account the concentration of the products (para. 90, Appendix III).

CCPR: CODEX COMMITTEE ON PESTICIDE RESIDUES**Agenda item 3****Proposed draft MRLs for pesticide at Step 5/8 (with omission of Steps 6/7) (para 113, Appendix II);**

Tanzania supports the adoption of the draft MRLs for the following pesticides at Step 5/8 with the omission of steps 6 and 7 as recommended by the Codex Committee on Pesticide Residues (Specific commodities are listed in Appendix II of Draft REP16/PR) as follows: Lindane (11 commodities), Chlorothalonil (13 commodities), Ethephon (26 commodities), Phorate (3 commodities), Cypermethrins (including alpha- and zeta- cypermethrin commodities) (1 commodity), Triazophos (4 commodities), Cyhalothrin (includes lambda-cyhalothrin commodities) (5 commodities), Propiconazole (5 commodities), Profenofos (5 commodities), Abamectin (40 commodities), Bifenthrin (4 commodities), Tebuconazole (10 commodities), Imidacloprid (11 commodities), Cyprodinil (1 commodity), Trifloxystrobin (4 commodities), Difenconazole (4 commodities), Pyrimethanil (4 commodities), Spirotetramat (3 commodities), Fluopyram (13 commodities), Acetamiprid (11 commodities), Flutriafol (28 commodities), Fluxapyroxad (29 commodities), Cyantraniliprole (27 commodities), Imazapic (1 commodity), Imazapyr (3 commodities), Acetochlor (31 commodities), Cyazofamid (13 commodities), Flonicamid (17 commodities), Flumioxazin (39 commodities), Lufenuron (15 commodities) and Quinclorac (2 commodities).

Agenda item 4**Proposed draft revision of the Classification of Food and Feed: Selected commodity groups - Group 020 Grasses of cereal grains at Step 5 (para 141, Appendix X);**

Tanzania supports adoption at Step 5 of the proposed draft documents.

Proposed draft Guidelines for performance criteria for methods of analysis for the determination of pesticide residues in food at Step 5 (para 163, Appendix XI). Other matters for adoption / approval

Tanzania supports the adoption of the guideline at Step 5 (as indicated in Appendix XI of Draft REP16/PR) after making a number of editorial changes to improve the accuracy and clarity of the document as well as to remove references to documents other than those adopted by the Codex Alimentarius Commission or developed by international organisations; with the agreement that they would be included as footnotes.

Agenda item 5**Maximum residue limits for pesticides recommended for revocation (para 113, Appendix III);**

Tanzania supports revocation of the MRLs for pesticides.

Codex schedules and priority list of pesticides for evaluation by JMPR (para 182, Appendix XII).**Agenda item 6**

Tanzania supports the priority list of pesticides for evaluation.

CCSCH: CODEX COMMITTEE ON SPICES AND CULINARY HERBS**Agenda item 4: Adoption at Step 5****Proposed Draft Standard for Cumin (para. 25 and Appendix III);**

Tanzania supports adoption at step 5 of proposed draft standards on Cumin. This is because substantial progress had been made on the standard but that some issues needed to be further discussed, i.e. definition of further processing and sampling plan and, therefore, the document was ready to progress in the Step Procedure. In addition, provisions for food additives, labelling and methods of analysis would be submitted to CCFA, CCFL and CCMAS, respectively, for endorsement.

Proposed Draft Standard for Thyme (para. 37 and Appendix IV).

Tanzania supports adoption of proposed draft standards on Thyme for adoption at step 5 on grounds that substantial progress had been made on the standard but some issues needed to be further discussed: i.e. definition of further processing and sampling plan and, therefore, the document was ready to progress in the Step Procedure. In addition, provisions for food additives, labelling and methods of analysis would be submitted to CCFA, CCFL and CCMAS, respectively for endorsement.

Tanzania also supports the following Committee recommendations:

- To establish an eWG, led by Brazil, open to all members and observers and working in English only, to prepare sampling plans for the inclusion in the standards for thyme and cumin, taking into account the recommendations of the Committee on Methods of Analysis and Sampling (CCMAS)¹¹, for consideration at its next session;

- To request the Committee on Contaminants in Foods (CCCF) to consider whether existing maximum levels of contaminants for leafy vegetables could apply to spices and culinary herbs or whether specific maximum levels should be drafted;

CCGP: CODEX COMMITTEE ON GENERAL PRINCIPLES

Agenda item 9

CODEX WORK MANAGEMENT AND FUNCTIONING OF THE EXECUTIVE COMMITTEE (REP 16/GP App.II, CX/CAC 16/39/10)

SECTION 2 - Review Framework

Tanzania supports the option in bullet 2 i.e. “Assess the efficiency and effectiveness of Codex work management practices according to SG4 of the Codex Strategic Plan (2014-2019)”

Justification

Within the Codex Strategic Plan 2014-2019, there are adequate inbuilt continuous progress monitoring mechanism to ensure that Codex processes run smoothly and efficiently. In fact, Strategic Goal 4 (SG4) which reads “Implement effective and efficient work management systems and practices” provides the means for evaluating the efficiencies or inefficiencies in Codex work management practices. SG4 therefore captures exactly the intent of the Codex Secretariat led-internal review. Conducting the review according to SG4 will ensure that the CAC focuses on the significant issues relevant to the improvement in the effectiveness and efficiency of Codex work. Consequently we support the inclusion of the first bullet under section 2.2 i.e. scope.

SECTION 3 - REVIEW METHODOLOGY

Tanzania supports the inclusion of the bracketed word “*validate*” as indicated in the text below:

Before beginning its work the Secretariat will provide Members with an opportunity to review [and validate] the materials to be used. This is because validation of the review materials is necessary to ensure that Codex members have a common understanding of issues which will be raised in the review material, hence lead to the provision of appropriate responses. Furthermore, as a major proponent of inclusiveness in standard-setting process, the Commission has an obligation to ensure that all Codex members are involved in the review process from the onset. Providing members with an opportunity to validate the review materials clearly will contribute to ensuring that Codex members own the review process.

CONSISTENCY OF THE RISK ANALYSIS TEXTS ACROSS THE RELEVANT COMMITTEES

Tanzania supports the recommendations to the Commission that:

- i. CCNFSDU should revise the text on nutritional risk analysis and consider how to include JEMNU as a primary source of scientific advice; and
- ii. The Secretariat should address minor numbering issues in the texts for CCCF, CCRVDF and CCPR with the relevant Committees.

This is necessary to ensure consistency in all risk analysis text used by relevant Codex Committees.

Agenda item 11

FUTURE WORK OF CODEX ON ANTIMICROBIAL RESISTANCE (CX/CAC 16/39/12)

Concerning the recommendations as set out in Section 5, para 49 – Recommendations, the following are Tanzania comments:

Tanzania supports start of new work on the following:

- a. The revision of the *Code of Practice to Minimise and Contain Antimicrobial Resistance* (CAC/RCP 61-2005) and
- b. The development of Guidance on Integrated Surveillance of Antimicrobial Resistance;

Justification: There has been new developments in the area of AMR since the standard (CoP) was developed in 2005 hence a revision would help address gaps and incorporate these new developments to make the standard relevant in a field where new issues are emerging rapidly.

Establishment of a dedicated Task Force on AMR and identification of host country(ies)

Tanzania supports this recommendation and look forward to discussing the Terms of Reference for a Task Force on AMR. It is our belief that given the global nature of the problem of AMR and the fact that various international organizations are involved in tackling the threat to AMR, it is prudent to ensure wider consultation on the ToR for the Task Force to be established. This is necessary to avoid duplication of work and ensure that global efforts to address AMR are complementary.

Request FAO/WHO to provide scientific advice on AMR, in collaboration with OIE

Tanzania supports the request to FAO/WHO to provide scientific advice on AMR in collaboration with OIE rationale being that Codex standards must be based on sound science reflecting current developments.

Request FAO and WHO to develop a capacity development programme to respond to the need identified.

Tanzania supports the recommendation on the need for FAO/WHO to develop capacity building programmes. Specific areas of concern which should be addressed include but not limited to the following: inadequate knowledge and expertise for conducting risk analysis of foodborne AMR, weak or non-existing regulatory framework on AMR and absent or ineffective national monitoring and control programmes on the use of antimicrobials.

We note the important decisions taken by the Governing bodies of FAO and WHO namely the WHO Global Action Plan on Antimicrobial Resistance and FAO Resolution on Antimicrobial Resistance and look forward to have coordinated efforts at the national and international level to address issues related to AMR.

CODEX TRUST FUND

Agenda item 6

Governance, application and communication of CTF2

Tanzania acknowledges the good governance established under the CTF2. The application materials consisting of application form for individual country application, an application form for group application and the guidelines on the application process. These materials were available in the CTF website. Furthermore, communication about CTF2 by the CTF Secretariat started last quarter of 2015 and in October 2015, all members were notified of the CTF. Announcement calling for countries to prepare for applications was sent out in January, 2016 while the pre-announcement was sent out to eligible countries in 1st March, 2016.

First round of applications to new CTF2- Process and results

According to the CTF2 Secretariat, 41 applications were received through the on-line system by deadline of 3rd May, 2016. 38 out of 41 applications were accepted after meeting pre-screening criteria and were sent to FAO/WHO Regional Food Safety Advisors for comments and eventually submitted to the Technical Review Group for assessment. The results to be announced at the CAC39.

General comments

The diagnostic tool used in the application process for CTF2 is welcomed as it enables countries to perform a scientific assessment on the status of national Codex programme. The tool has helped us as a country to assess what is working well and identify areas in need of improvement.

However, we noted some difficulties with the application process and recommend that a forum is created to enable successful CTF2 countries share their experience on the application process with countries which are yet to apply. We also recommend that countries that were not successful in the first round of application should continue carrying out an assessment of the Codex activities using the Diagnostic Tool as preparation for the second round of application.

Tanzania looks forward to receiving and discussing feedback on the application to CTF2 first round. We also look forward for the Commission to have further discussions on possible funding mechanisms to sustain CTF2 to ensure that it delivers its intended purpose of strengthening national Codex capacities to enable countries contribute more to the Codex standard setting process.

Agenda item 20.2**II. VISAS ISSUES FOR ATTENDANCE AT CODEX MEETINGS**

During the CAC38 delegates were informed of the VISA issues for attendance at Codex meetings. This subject was proposed by Cameroon and flagged under "Other Business (Agenda Item 13)". However, it was not discussed due to time constraints. In preparation of the 39th Session of the Codex Alimentarius Commission, the Codex Secretariat requested information on visa issuance problems that Members might have encountered while attending Codex Meetings. In response to the letter sent by the Codex Secretariat, ten (10) replies were received from CCPs, including five (5) from host countries and five (5) from participating countries. It was noted further that the number of replies received was too low to draw conclusions on the magnitude of the issue.

The Commission was being invited to take note of this matter and consider the possibility to **appeal to host countries to grant visas on arrival at the airport to delegates from countries where there were no diplomatic representation of the meeting host country**. It is also important that appropriate host government departments upon request promptly provide delegates with visa facilitation letters to assist them in the visa application process.

Tanzania appreciates the opportunity to submit information as requested by the Codex Secretariat on visa issuance problems encountered to attend Codex Meetings and supports issuing VISA to the delegates upon arrival by the host countries. Furthermore, the neighboring countries to the host country should also facilitate and wave for transit VISA where necessary.