

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX ALIMENTARIUS COMMISSION

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

Comments of Sierra Leone, Senegal, Gambia, Peru, Mexico, Philippines, European Union, Kazakhstan, Thailand, Liberia, Ghana

- **Committee on Fresh Fruits and Vegetables**
- **Comité sur les fruits et légumes frais**
- **Comité sobre fruta y hortaliza frescas**

Standard for aubergines (draft)
(REP 18/FFV) (Para 19Appendix II)

Comments of Sierra Leone, Senegal, Gambia, European Union, Thailand, Liberia, Ghana, Philippines

SIERRA LEONE

Main issues:-

A revised version of the Draft Standard for Aubergines (prepared by India based on discussions at CAC39 and comments submitted at CCFFV20) was considered at CCFFV20. The Committee had extensive deliberations on the inclusion of tolerances in “Extra” Class in the Draft Standard for Aubergines. In particular, tolerances for decay, soft rot and/or internal breakdown for “Extra” Class.

The Committee agreed on having “Extra” Class in the Draft Standard for Aubergines. However, Delegations present at CCFFV20 had divergent views on the tolerance levels to be allowed in “Extra” Class, with proposals ranging from 0% to 1%.

Delegations in favour of 0% tolerance for decay, soft rot and/or internal breakdown noted that there was no need for tolerance in “Extra” Class as Aubergines in “Extra” Class should be of superior quality and exceptional nature.

Delegations in favour of tolerance levels of 0.5%, 1% or \leq 1% in “Extra” Class were of the view that Codex standards should be scientifically based, reflect current practices and facilitate trade. Zero tolerance was not appropriate for fresh perishable produce often transported over long distances. Fruits and vegetables irrespective of class are perishable by nature and may show signs of decay during shipping and transportation.

After extensive discussions and deliberations, the Committee decided to retain “Extra” Class in the Draft Standard and include a 1% tolerance for decay, soft rot and/or internal breakdown in “Extra” Class.

Colombia, Thailand, Morocco and the European Union and its Member States asked the Committee to note their objection to the inclusion of a 1% tolerance for decay in Extra Class.

The Committee agreed to forward the draft Standard for Aubergines to CAC41 for Adoption at Step 8.

RECOMMENDATION POSITION

Sierra Leone support the adoption of the Draft Standard for Aubergines (at Step 8) with the 1% tolerance for decay, soft rot and/or internal breakdown for “Extra” Class. Taking into the consideration the transportation system and handling process of fresh fruit and vegetable in less developed countries irrespective of class are

perishable by nature and zero tolerance will create barrier to trade for these countries.

SENEGAL

Contexte : Une version révisée du projet de norme pour Aubergines a été examinée par le CCFFV 20. Le Comité a longuement débattu de l'inclusion des tolérances dans la catégorie «Extra» dans le projet de norme pour les Aubergines. En particulier, les tolérances pour décomposition, la pourriture molle et/ou la ventilation interne pour la catégorie «Extra».

Le Comité a convenu d'inscrire la catégorie «Extra» dans le projet de norme pour les Aubergines

Position : Le Sénégal est d'accord pour l'adoption de ce projet de norme à l'étape finale

Justification : Les fruits et les légumes sont périssables. Le fait d'avoir un niveau de tolérance de 1 % pour la catégorie «Extra» tient compte de la décomposition naturelle, de la pourriture molle et/ou de la ventilation interne de ces produits pouvant survenir pendant le transport, l'expédition et la manutention des régions productrices vers les marchés locaux et d'exportation.

GAMBIA

BACKGROUND: A revised version of the Draft Standard for Aubergines (prepared by India based on discussions at CAC39 and comments submitted at CCFFV20) was considered at CCFFV20. The Committee had extensive deliberations on the inclusion of tolerances in "Extra" Class in the Draft Standard for Aubergines. In particular, tolerances for decay, soft rot and/or internal breakdown for "Extra" Class.

POSITION: Gambia supports the adoption of the Draft Standard for Aubergines (at Step 8) with the 1% tolerance for decay, soft rot and/or internal breakdown for "Extra" Class.

RATIONALE: Fruits and vegetables are perishable in nature. Having a 1% tolerance level for "Extra" class will account for natural decay, soft rot and/or internal breakdown that may occur during transportation, shipping and handling from producing regions to local and export markets.

EUROPEAN UNION

Mixed Competence

Member States vote

The European Union and its Member States (EUMS) reiterate their reservation to the provisions allowing a tolerance for decay in "Extra" Class for Aubergines.

The EUMS believe that a tolerance for decay in "Extra" class is not in line with the concept of "Extra" Class, which is a special status granted to products of exceptionally high quality. As aubergine in particular is not prone to decay at stages after preparation and packaging a tolerance for decay in "Extra" class is not justified.

Apart from the Standard for Apples¹, Codex Standards for Fresh Fruit and Vegetables do not foresee a tolerance for decay in the "Extra" Class produce.

Equally, the existing International Standard for Aubergines² does not foresee a tolerance for decay in "Extra" Class. This standard recognises "Extra" Class as a very high quality status that should be clearly distinguished from Class I and others. When departing from an existing international standard, Codex should justify the rationale behind its choices. A clear rationale has not been provided so far.

The EUMS regret that the Codex Committee on Fresh Fruits and Vegetables has decided not to take the reality of trade and existing international standards into account in the elaboration of a standard for aubergines. The EUMS regret furthermore that not enough efforts have been made in trying to find a consensus and that the standard has been advanced to step 8 notwithstanding the high number of reservations.

In the spirit of compromise, the EUMS will not object to the adoption of the standard for aubergines at step 8 but reiterate their strong reservation to the adoption of the standard.

Furthermore, the EUMS underline that a general solution is needed for the tolerance for decay in extra class before any new standard is adopted.

¹ http://www.fao.org/input/download/standards/11509/CXS_299e.pdf

² http://www.unece.org/fileadmin/DAM/trade/agr/standard/standard/fresh/FFV-Std/English/05_Aubergines.pdf

THAILAND

Thailand would like to express our concern regarding the tolerances related to decay in "Extra" Class in the draft standard for aubergines.

In principle, we agree that for certain commodities, its Extra Class may need a certain level of tolerances for decay due to the nature of the produce as well as not posing hindrance to trade. However, we are of the opinion that “Extra” Class should be of superior quality and the produce classified in this class should be treated with the best care compared to those in other classes, therefore the acceptable level of tolerance for decay, if allowed, should be lower than that of Class I. In this case, aubergine was not highly susceptible to decay thus the tolerance for decay in Extra Class should be at least lower than 1%.

Moreover, Thailand recalls an extensive discussion in the 41st meeting of CCFFV on this issue. To prevent such situation in future, we would like to propose to CCFFV to consider setting clearer principle or conditions to allow tolerances related to decay in “Extra” class, for instance setting definition or explanation on decay.

LIBERIA

Background/Issue

A revised version of the Draft Standard for Aubergines (prepared by India based on discussions at CAC39 and comments submitted at CCFFV20) was considered at CCFFV20. The Committee had extensive deliberations on the inclusion of tolerances in “Extra” Class in the Draft Standard for Aubergines. In particular, tolerances for decay, soft rot and/or internal breakdown for “Extra” Class.

The Committee agreed on having “Extra” Class in the Draft Standard for Aubergines. However, Delegations present at CCFFV20 had divergent views on the tolerance levels to be allowed in “Extra” Class, with proposals ranging from 0% to 1%.

Delegations in favor of 0% tolerance for decay, soft rot and/or internal breakdown noted that there was no need for tolerance in “Extra” Class as Aubergines in “Extra” Class should be of superior quality and exceptional nature.

Delegations in favor of tolerance levels of 0.5%, 1% or $\leq 1\%$ in “Extra” Class were of the view that Codex standards should be scientifically based, reflect current practices and facilitate trade. Zero tolerance was not appropriate for fresh perishable produce often transported over long distances. Fruits and vegetables irrespective of class are perishable by nature and may show signs of decay during shipping and transportation.

After extensive discussions and deliberations, the Committee decided to retain “Extra” Class in the Draft Standard and include a 1% tolerance for decay, soft rot and/or internal breakdown in “Extra” Class.

Colombia, Thailand, Morocco and the European Union and its Member States asked the Committee to note their objection to the inclusion of a 1% tolerance for decay in Extra Class.

The Committee agreed to forward the draft Standard for Aubergines to CAC41 for Adoption at Step 8.

Recommended Position for CAC41

Liberia supports the adoption of the Draft Standard for Aubergines (at Step 8) with the 1% tolerance for decay, soft rot and/or internal breakdown for “Extra” Class.

GHANA

POSITION: Ghana supports the adoption of the Draft Standard for Aubergines (at Step 8) with the 1% tolerance for decay, soft rot and/or internal breakdown for “Extra” Class.

RATIONALE: Due to the perishable nature of fruits and vegetables, having a 1% tolerance level for “Extra” class will account for natural decay, soft rot and/or internal breakdown that may occur during transportation, shipping and handling from producing regions to local and export markets.

CCFL: Draft Revision of the General Standard for the Labelling of Prepackaged Foods: date marking, REP18/FL para 32

POSITION: Ghana supports the adoption of the revision of the General standard for the labelling of Prepackage Foods.

RATIONALE: The requirements in the draft standard provide flexibility for Competent Authorities to apply the criteria depending on their needs. In addition the current provision requires that the date marking is preceded by specific wordings such as “Manufacture date:”, “expiry date:” and “Best Before”. However, the current situation on the market shows that these words are not always included on the food product label and abbreviations are used instead. The use of abbreviations is linked to issues related to labeling space limitations, technological challenges and cost for the manufactures. Absence of standardized format may lead to confusion to the consumer.

PHILIPPINES

2. PROVISIONS CONCERNING QUALITY

2.1 Minimum Requirements

The Philippines proposes to simplify the minimum requirements of aubergines on the following characteristics:

- Firm, whole and fresh in appearance
- Clean and practically free from any visible foreign matter
- Calyx and peduncle shall not be damaged
- Free from decay or deterioration;
- Free from damage by pests; and
- Not over mature

2.1.2 Maturity Requirements

The Philippines proposes that the term “sufficiently developed” be replaced with the term “commercial maturity”, and the line will read as this. The aubergine must reach commercial maturity without the flesh being fibrous or woody and without hard seeds.

Rationale: Commercial maturity is the stage of development, when the plant or plant part possesses the necessary characteristics for use by consumers or consumer’s desire for particular purpose. Aubergines at the commercial maturity, to be supplied fresh are harvested immature or physiologically mature.

Commercial maturity could be measured by:

- 1) Number of days from sowing to first harvest which ranges from 50-55 days depending on the variety (PNS, 1997; IBPGR, 1990). At this stage the seeds of the fruit of aubergines are not enlarged and are still soft.
- 2) Fruit color or depends upon the variety or accession (IBPGR, 1990).
- 3) Fruit firmness, glossiness and not pithy. (Cantwell and Suslow, 1997).

Thus, the aubergines must be carefully harvested at **commercial maturity** or have reached an appropriate degree of development in accordance with criteria proper to the variety, accession, and/or commercial type and to the area in which they are grown.

3. PROVISION CONCERNING SIZING

The Philippines proposes sizing by weight for aubergines in order to simplify the standard which can be easily understood and followed during actual inspection as follows:

Table 1. Sizing by weight of aubergines.

| SIZE Code | WEIGHT (grams) |
|----------------------|---------------------------|
| 1 | >300 |
| 2 | 251-300 |
| 3 | 201-250 |
| 4 | 151-200 |
| 5 | 101-150 |
| 6 | 51-100 |
| 7 | 30-50 |

The basis for the classification of size of aubergine is the ASEAN Standard for Eggplant (ASEAN Stan 26:2012). The Philippine standard for size by weight of eggplant is within the ASEAN Standard. However, the range of weights per size code in the ASEAN Standard was modified so as not to overlap the values in two size codes to prevent confusion in the actual classification of the fruits when its weight fall on the overlapping weight. Table 2 and Table 2-a shows the ASEAN Standard and Philippine Standard for size classification of aubergines, respectively.

Table 2. Size classification of aubergines (ASEAN Stan 26:2012)

| SIZE Code | WEIGHT (grams) ASEAN Standard |
|----------------------|--|
| 1 | >300 |
| 2 | >250-300 |
| 3 | > 200-250 |
| 4 | >150-200 |
| 5 | >100-150 |
| 6 | >50-100 |
| 7 | >30-50 |

Table 2-a. Size classification of aubergines (PNS/BAFPS 52:2007)

| Size Classification | Weight (grams) PNS/BAFPS 52:2007 |
|--------------------------------|---|
| Small | 50-100 |
| Medium | 101-200 |
| Large | >200 |

- **Committee on Food Labelling**
- **Comité sur l'étiquetage des denrées alimentaires**
- **Comité sobre etiquetado de los alimentos**

Revision of the General Standard for the Labelling of Prepackaged Foods: date marking (CXS 1-1985) (Draft) REP 18/FL Para 32, Appendix II

Comments of Sierra Leone, Senegal, Gambia, Peru, Liberia, Philippines

SIERRA LEONE

Main issues are:-

a) Criteria for exemption for some food products from date marking.

Noting that:

Before CCFL 44 meeting, the discussion in Africa on the matter mainly focused on the following concerns:

- Clarity of criteria and cut –off- point from one criteria to another.
 - Criteria on food intended for consumption within 24 hrs of manufacture which includes backed goods. Africa expressed concerns on the fact that the exemptions might apply to foods for which such exemptions were not intended. Example of pre-packaged food from the same category that are sold or consumed beyond 24 hrs after manufacture in Africa include sponge cakes, birthday cakes and breads.
- b) A need to revise or not to revise the existing list of examples of food products that are exempted from date marking as per current version of Codex GSFLPF(Codex Stan 1-1985)
- c) Revision of definition of terms for use in date marking of pre-packaged food
- d) A need to standardize abbreviations for date marking in the future

RECOMMENDATION POSITION

Sierra Leone support the *Adoption at Step 8 Draft Revision of the General Standard for the Labelling of Pre-packaged Foods: date marking, REP18/FL para 32* taking into the consideration the work to standardised abbreviation of date marking and must be given high priority.

SENEGAL

Contexte 1: le CCFL en sa quarante-troisième session a confirmé les définitions arrêtées pour les mentions DLUO et DLC.

Position: le Sénégal approuve les définitions retenues pour les termes DLC et DLUO par le CCFL

Justificatif: les définitions données cadrent avec les objectifs visés pour l'utilisation de chaque mention et prennent en compte également la nature des aliments concernés par ces mentions.

Contexte 2: Sur les critères d'exemption de datage et la liste des aliments exemptés, le Comité a choisi de conserver les critères énumérés et la liste sans amendements et d'ajouter une note de bas de page précisant que la liste est indicative

Position: Le Sénégal soutient les conclusions mais demande de rajouter dans le libellé de la note de bas de page ce qui suit : «les autorités nationales peuvent fixer elles-mêmes la liste des aliments exemptés conformément au paragraphe 29 iii ».

Justificatif: la précision est nécessaire pour permettre aux autorités nationales de prendre des actes réglementaires pour déterminer les aliments devant être exemptés en fonction de leurs spécificités. Cette faculté laissée aux pays doit être clairement libellée dans la norme.

GAMBIA

BACKGROUND: Main issues with regard to this standard are: -

- e) Criteria for exemption for some food products from date marking.
- f) A need to revise or not to revise the existing list of examples of food products that are exempted from date marking as per current version of Codex GSFLPF (Codex Stan 1-1985)
- g) Revision of definition of terms for use in date marking of pre-packaged food
- h) A need to standardize abbreviations for date marking in the

POSITION: Gambia supports the adoption with condition that Para 31 (d), in REP 18/FL, be rephrased to read as "There is a need to standardize the date marking when abbreviations are used instead of wordings on the label".

RATIONALE: The current provision requires that the date marking is preceded by specific wordings such as "Manufacture date:", "expiry date:" and "Best Before". However, the current situation on the market shows that these words are not always included on the food product label and abbreviations are used instead. The use of abbreviations is linked to issues related to labeling space limitations, technological challenges and cost for the manufactures. Absence of standardized format may lead to confusion to the consumer. This in Africa is an area of concern which should be given enough attention.

PERU

Nombre del Comité del Codex: Etiquetado de alimentos

Nombre del Documento: Solicitud de observaciones en el trámite 8 sobre el Proyecto de revisión de las disposiciones relativas al marcado de la fecha de la Norma general para el etiquetado de los alimentos preenvasados (CXS 1-1985)

Signatura del documento: CL 2017/86/OCS-FL

Fecha: 2018-04-27

Observaciones generales: La opinión de la Comisión Técnica Nacional en el marco del Codex Alimentarius al documento CL 2017/86/OCS-FL es estar de acuerdo con el documento.

Específicas: Encontrando observaciones en el capítulo 4.7.1 (iv), según lo siguiente:

En el documento en inglés

(iv) The date shall be introduced by the words:

- “Use-by <insert date or reference>” or “Expiration Date <insert date or reference >” or “Best before <insert date or reference >” or “Best Quality Before <insert date or reference >” as applicable where the day is indicated; or
- “Use-by end <insert date or reference >” or “expiration date end <insert date or reference >” or “Best before end <insert date or reference >”; or “Best Quality Before end <insert date or reference >” as applicable in other cases.

En la traducción al castellano:

La fecha deberá ir precedida de las palabras:

“Consumir antes del <insertar fecha o referencia>” o “Fecha de caducidad/Fecha de vencimiento <insertar fecha o referencia>” o “Consumir preferentemente antes del <insertar fecha o referencia>” o “Fecha de mejor calidad <insertar fecha o referencia>”, según corresponda, cuando se indica el día;

“Consumir antes del final de <insertar fecha o referencia>” o “Fecha de caducidad/Fecha de vencimiento: final de <insertar fecha o referencia>” o “Consumir preferentemente antes del final de <insertar fecha o referencia>” o “Fecha de mejor calidad: antes del final de <insertar fecha o referencia>”, según corresponda, en los demás casos.

La inclusión de la palabra “referencia” luego de “insertar fecha”, se justifica para guardar concordancia con lo señalado en el acápite 4.7.1.(v) que permite las dos opciones.

LIBERIA

Background/Issue

Main issues are:

- i) Criteria for exemption for some food products from date marking.

Noting that:

Before CCFL 44 meeting, the discussion in Africa on the matter mainly focused on the following concerns:

- Clarity of criteria and cut –off- point from one criteria to another.
 - Criteria on food intended for consumption within 24 hrs of manufacture, which includes baked goods. Africa expressed concerns on the fact that the exemptions might apply to foods for which such exemptions were not intended. Example of prepackaged food from the same category that are sold or consumed beyond 24 hrs after manufacture in Africa include sponge cakes, birthday cakes and breads.
- j) A need to revise or not to revise the existing list of examples of food products that are exempted from date marking as per current version of Codex GSFLPF (Codex Stan 1-1985)
 - k) Revision of definition of terms for use in date marking of pre-packaged food. A need to standardize abbreviations for date marking in the future.

Recommended Position for CAC41

Support adoption

Liberia considers the work to standardize abbreviations as important and that this should be given high priority

PHILIPPINES

The Philippines supports the revision of date marking provisions of the General Standard for the Labelling of Prepackaged Foods because it will lessen technical barrier to trade issues. Moreover, the harmonized date marking declaration will help communicate clearer information to the consumers across the globe.

| Proposed Draft (At Step 6) | Philippines Specific Comments |
|---|--|
| 2. DEFINITION OF TERMS For use in Date Marking of pre-packaged food: | |
| <p>“Best Before Date” or “Best Quality Before Date” means the date which signifies the end of the period, under any stated storage conditions, during which the unopened product will remain fully marketable and will retain any specific qualities for which implied or express claims have been made. However, beyond the date the food may still be acceptable for consumption.</p> | <p>Country Position:</p> <p>The Philippines reiterates to include “estimated” to read as “the end of the <u>estimated</u> period”.</p> <p>Rationale:</p> <p>This is to clearly define this date marking.</p> |
| <p>“Use-by Date” or “Expiration Date” means the date which signifies the end of the period under any stated storage conditions, after which the product should not be sold or consumed due to safety and quality reasons.</p> | <p>Country Position:</p> <p>The Philippines proposes to include “Consume BeforeDate”. The country reiterates its position to revise the phrase “after which the product should not be sold or consumed due to safety and quality reasons” to read as “after which the product should not be sold or consumed due to safety, nutritional and quality reasons”.</p> <p>Rationale:</p> <p>The country has adopted this date marking for most if not all of its products to address the concerns of its consumers. The manufacturer has a responsibility to conduct a shelf life analysis before the declaration of this date mark. However, in the conduct of a shelf life study, quality parameters and other claims such for nutritional (e.g. fortification) purposes are also considered during the conduct of shelf life studies.</p> <p>Further, the Philippines also proposes that this type of date marking be present in all other date marking declaration to strengthen consumer understanding of the condition of the product and how to handle it.</p> |
| <p>4.7 Date marking and storage instructions 4.7.1 If not otherwise determined in an individual Codex standard, the following date marking shall apply unless clause 4.7.1(v) applies:</p> | |

| | |
|--|--|
| <p>(i) When a food must be consumed before a certain date to ensure its safety and quality the “Use by Date” or “Expiration Date” shall be declared.</p> | <p>Country Position: The Philippines proposes to include “Consume Before Date”. The country reiterates its position to include nutritional adequacy to read as “certain date to ensure its safety, nutritional adequacy and quality”.</p> <p>Rationale: The country has adopted this date marking for most if not all of its products to address the concerns of its consumers. Further, we reiterate our view that the manufacturer has a responsibility to conduct a shelf life analysis before the declaration of this date mark. In the conduct of a shelf life study, quality parameters are also included. Other claims such for nutritional (e.g. fortification) purposes are also considered during the conduct of shelf life studies.</p> |
| <p>(ii) Where a “Use-by Date” or “Expiration Date” is not required, the “Best-Before Date” or “Best Quality Before Date” shall be declared.</p> | <p>Country Position: The Philippines proposes to include “Consume Before Date”.</p> <p>Rationale: The country has adopted this date marking for most if not all of its products to address the concerns of its consumers.</p> |
| <p>(iv) The date shall be introduced by the words:</p> <ul style="list-style-type: none"> • “Use-by<insert date>” or “Expiration Date <insert date>” or “Best before<insert date>” or “Best Quality Before <insert date>” as applicable where the day is indicated; or • “Use-by end <insert date>” or “expiration date <insert date>” or “Best before<insert date>”; or “Best Quality Before <insert date>” as applicable in other cases. | <p>Country Position: The Philippines proposes to include “Use or Consume Before Date”. The country also proposes to include abbreviation for date marking terminologies such as:</p> <ul style="list-style-type: none"> • Expiration Date: EXP • Consume Before: Consume Bef • Best Before: Best Bef <p>Rationale: The country has adopted this date marking for most if not all of its products to address the concerns of its consumers. The use of abbreviation for date marking terminologies will solve label space and coding equipment limitations and help in the reduction of printing cost.</p> |
| <p>(vi) The day and year shall be declared by uncoded numbers with the year to be denoted by 2 or 4 digits, and the month shall be declared by letters or characters or numbers. Where only numbers are used to declare the date or where the year is expressed as only two digits, the competent authority should determine whether to require the sequence of the day, month, year, be given by appropriate abbreviations accompanying the date mark (e.g. DD/MM/YYYY or YYYY/DD/MM).</p> | <p>Country Position: The Philippines also proposes to revise the word “abbreviation” to “legend” since it is more appropriate.</p> <p>Rationale: The word “abbreviation” does not apply to DD/MM/YYYY since it is not abbreviated but rather a “legend” informing the consumers that the numbers declared on the product label refers to the date marking.</p> |
| <p>(vii) Notwithstanding 4.7.1(i) and 4.7.1(ii), a date mark shall not be required for a food if one or more of the following criteria apply:</p> <ol style="list-style-type: none"> 1. Where safety is not compromised and quality does not deteriorate <ol style="list-style-type: none"> 1.1. because of the preservative nature of the food is such that it cannot support microbial | <p>Country Position: The Philippines proposes for the deletion of the criteria.</p> <p>Rationale: It will be difficult for regulators to implement.</p> |

| | |
|---|---|
| <p>growth (e.g. alcohol, salt, acidity, low water activity); and/or</p> <ol style="list-style-type: none"> 1.2. under stated storage conditions; 2. Where the deterioration is evident to the consumer; 3. Where the key/ organoleptic quality aspects of the food are not lost; 4. Where the food is intended to be consumed within 24 hours of its manufacture. | |
| <p>For example, foods such as:</p> <ul style="list-style-type: none"> • fresh fruits and vegetables, including tubers, which have not been peeled, cut or similarly treated; • wines, liqueur wines, sparkling wines, aromatized wines, fruit wines and sparkling fruit wines • alcoholic beverages containing at least 10% alcohol by volume; • bakers' or pastry-cooks' wares which, given the nature of their content, are normally consumed within 24 hours of their manufacture; • vinegar; • non-iodized food grade salt; • non-fortified solid sugars; • confectionery products consisting of flavoured and/or coloured sugars; chewing gum. | <p>Country Position: The Philippines proposes for the deletion of the exemption list.</p> <p>Rationale: The standard is for pre-packaged foods. Foods that are not considered as pre-packaged such as fresh fruits and vegetables are not included. The country regulation requires date marking for pre-packaged foods except alcoholic beverages.</p> |

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

Revision of the Code of Practice for Fish and Fishery Products: Guidance for histamine control (CXC 52-2003) (Proposed Draft) REP 18/FH Para 40, Appendix II

Comments of Sierra Leone, Senegal, Gambia, Liberia, Ghana, Philippines

SIERRA LEONE

Adoption at Step 5/8

Proposed Draft Revision of the Code of Practice for Fish and Fishery Products (CXC 52-2003): Guidance for histamine control, REP18/FH para 40 and App.II

Main issues:-

Guidelines for histamine control are proposed as a new section in the Code of Practice for Fish and Fishery Products (CXC 52-2003) by providing detailed control recommendations for the prevention of scombrototoxin fish poisoning (SFP). Based on feedback from the EWG, the Co-Chairs prepared a revised proposal that made it clear that HACCP is not required on fishing vessels.

The committee accepted most of the additional amendments to ensure clarity and flexibility.

An issue which received divergent opinion was the information that freshly harvested fish typically have histamine levels below 2 mg / kg and that operators applying HACCP may achieve a histamine level of less than 15 mg / kg. The committee agree to move to histamine levels a footnote.

The most contentious issue was whether to include Salmonidae in the list of species at risk for histamine formation. Following extensive discussions, The committee agreed to list the six families associated with SFP (i.e. Scombridae, Clupeidae, Engraulidae, Coryphaenidae, Pomatomidae, Scomberesocidae) already referenced in CXC-52-2003 and indicated that this list could be expanded later

RECOMMENDATION POSITION

Sierra Leone recommend the adoption of the code of practice at step 5/8

SENEGAL

Contexte : Des lignes directrices pour le contrôle de l'histamine sont proposées comme nouvelle section du Code d'usages pour les poissons et les produits de la pêche (CXC 52-2003) en fournissant des recommandations de contrôle détaillées pour la prévention de l'intoxication à la scombrottoxine. La proposition révisée par le GTE indiquant clairement que le système HACCP n'est pas requis sur les navires de pêche est pertinente et assure la clarté et la souplesse attendue dans le document.

Le comité a accepté la plupart des modifications supplémentaires pour assurer la clarté et la souplesse.

Une question qui a suscité des opinions divergentes était l'information selon laquelle les poissons fraîchement récoltés ont généralement des niveaux d'histamine inférieurs à 200 mg / kg et que les opérateurs appliquant le HACCP peuvent atteindre un taux d'histamine inférieur à 150 mg / kg. Le comité a accepté de mettre en note de bas de page les niveaux d'histamine

La question la plus controversée était de savoir s'il fallait inclure les salmonidés dans la liste des espèces à risque de formation d'histamine. Après des discussions approfondies, le comité a convenu d'énumérer les six familles associées à l'intoxication à la scombrottoxine (Scombridae, Clupeidae, Engraulidae, Coryphaenidae, Pomatomidae, Scomberesocidae) déjà référencées dans CXC-52-2003 et a indiqué que cette liste pourrait être élargie plus tard.

Position :

Le Sénégal soutient la proposition d'adoption de ces lignes directrices à l'étape 5/8

Justification

Cette section complète d'autres sections du Code en fournissant des recommandations de contrôle détaillées pour la prévention de l'intoxication à la scombrottoxine. Les directives appuieront les interventions de gestion des risques pour prévenir le scombrottoxisme

GAMBIA

BACKGROUND

Guidelines for histamine control are proposed as a new section in the Code of Practice for Fish and Fishery Products (CXC 52-2003) by providing detailed control recommendations for the prevention of scombrottoxin fish poisoning (SFP). Based on feedback from the EWG, the Co-Chairs prepared a revised proposal that made it clear that HACCP is not required on fishing vessels.

POSITION: The Gambia supports the the adoption of Section [X] – Harvesting, Processing, Storage and distribution of Fish and Fishery Products at Risk for Scombrottoxin (Histamine, Formation of the Proposed Draft Revision of the *Code of Practice for Fish and Fishery Products* (CXC 52-2003) and the compromise position to only list the six families already referenced in CXC 52-2003.

RATIONALE: This section complements other sections of the Code by providing detailed control recommendations for the prevention of scombrottoxin fish poisoning (SFP). The guidance will support risk management interventions for preventing SFP. Adopting the same approach for footnote 6 is necessary to ensure consistency of footnote format.

LIBERIA

Background/Issue

Guidelines for histamine control are proposed as a new section in the Code of Practice for Fish and Fishery Products (CXC 52-2003) by providing detailed control recommendations for the prevention of scombrottoxin fish poisoning (SFP). Based on feedback from the EWG, the Co-Chairs prepared a revised proposal that made it clear that HACCP is not required on fishing vessels.

The committee accepted most of the additional amendments to ensure clarity and flexibility.

An issue which received divergent opinion was the information that freshly harvested fish typically have histamine levels below 2 mg / kg and that operators applying HACCP may achieve a histamine level of less than 15 mg / kg. The committee agree to move to histamine levels a footnote.

The most contentious issue was whether to include Salmonidae in the list of species at risk for histamine formation. Following extensive discussions, The committee agreed to list the six families associated with SFP (i.e. Scombridae, Clupeidae, Engraulidae, Coryphaenidae, Pomatomidae, Scomberesocidae) already referenced in CXC-52-2003 and indicated that this list could be expanded later.

Recommendations

Liberia supports adoption of the code of practice at step 5/8

GHANA

POSITION: Ghana supports the adoption of the Code of Practice at step 5/8

RATIONALE: The Code of Practice provides detailed control recommendations for the prevention of scombrotxin fish poisoning (SFP). The guidance will also support risk management interventions for preventing SFP.

PHILIPPINES

The Philippines supports the Proposed Draft on Guidance for Histamine (Scombrotxin) Control at Step 5/8 for adoption by the Codex Alimentarius Commission in the Revision of the Code of Practice for Fish and Fishery Products (CXC52-2003)

Rationale:

The proposed revision is consistent with the existing general and specie-specific Fisheries Administrative Order issued by the Bureau of Fisheries and Aquatic Resources

- **Codex Committee on contaminants in food**
- **Comité sur les contaminants dans les aliments**
- **Comité sobre contaminantes de los alimentos**

MLs for lead in selected commodities (Proposed draft) (REP 18/CF Para 45 Appendix II)

Comments of Sierra Leone, Liberia, Ghana

SIERRA LEONE

- MLs for grape juice, mango chutney, canned brassica vegetables, fresh farmed mushrooms, salt (excluding salt from marshes), fat spreads and blended spreads, edible fats and oils

Main issues:-

At the 73rd JECFA Meeting in 2010 it was established that the Provisional Tolerable Weekly Intake (PTWI) of 25ug/kg bw for lead in foods was no longer health protective. It was therefore withdrawn and since then it has not been possible to establish a new Provisional Tolerable Weekly Intake (PTWI)

The 6th session of CCCF (2012) therefore agreed to review MLs of lead in foods listed in the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995).

Proposed Maximum levels (MLs) have been based on percentage of occurrence data that could meet the proposed lower MLs (ALARA principle). This review has been on-going since 2013.

RECOMMENDATION POSITION

Sierra Leone support CCCF12 to advance the following MLs for adoption at Step 5/8:

GRAPEJUICE

Lower ML from 0.05 to 0.04 mg/kg

MANGO CHUTNEY

Lower ML from 1 to 0.4mg/kg

CANNED BRASSICA VEGETABLES

To be included in the canned vegetables category with an ML of 0.1 mg/kg.

FRESH FARMED MUSHROOMS

ML of 0.3 mg/kg established for common mushrooms (*Agaricus bisporus*), Shiitake mushrooms (*Lentinula edodes*) and Oyster mushrooms (*Pleurotus ostreatus*)

SALT (EXCLUDING SALT FROM MARSHES)

Lower ML from 2 to 1 mg/kg

FAT SPREADS AND BLENDED SPREADS

Lower ML from 0.1 to 0.04 mg/kg

EDIBLE FATS AND OILS

Lower ML from 0.1 to 0.08 mg/kg

LIBERIA

Adoption at Step 5/8 Revocation, Amendment

- MLs for lead in selected commodities (revision of MLs / revocation of corresponding MLs / amendments to MLs) REP18/CF para 45
- MLs for grape juice, mango chutney, canned brassica vegetables, fresh farmed mushrooms, salt (excluding salt from marshes), fat spreads and blended spreads, edible fats and oils

Background/Issues

At the 73rd JECFA Meeting in 2010 it was established that the Provisional Tolerable Weekly Intake (PTWI) of 25ug/kg bw for lead in foods was no longer health protective. It was therefore withdrawn and since then it has not been possible to establish a new PWTI.

The 6th session of CCCF (2012) therefore agreed to review MLs of lead in foods listed in the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995).

Proposed Maximum levels (MLs) have been based on percentage of occurrence data that could meet the proposed lower MLs (ALARA principle). This review has been on-going since 2013.

Recommendations

Liberia supports adoption but expresses express reservation about the continuous lowering of MLs.

GHANA

POSITION: Ghana supports the adoption of the MLs of the following commodities at Step 5/8:

GRAPEJUICE

Lower ML from 0.05 to 0.04 mg/kg

MANGO CHUTNEY

Lower ML from 1 to 0.4mg/kg

CANNED BRASSICA VEGETABLES

To be included in the canned vegetables category with an ML of 0.1 mg/kg.

FRESH FARMED MUSHROOMS

ML of 0.3 mg/kg established for common mushrooms (*Agaricus bisporus*), Shiitake mushrooms (*Lentinula edodes*) and Oyster mushrooms (*Pleurotus ostreatus*)

SALT (EXCLUDING SALT FROM MARSHES)

Lower ML from 2 to 1 mg/kg

FAT SPREADS AND BLENDED SPREADS

Lower ML from 0.1 to 0.04 mg/kg

EDIBLE FATS AND OILS

Lower ML from 0.1 to 0.08 mg/kg

RATIONALE: The new MLs will protect the health of consumers without affecting trade. Once the new levels are approved we support the revocation of the existing MLs.

MLs for cadmium in chocolate containing or declaring $\geq 50\%$ to $< 70\%$ total cocoa solids on a dry matter basis; and chocolate containing or declaring $\geq 70\%$ total cocoa solids on a dry matter basis (REP 18/CF Paras. 67 (i) and (ii), Appendix III (Proposed Draft))

Comments of Sierra Leone, Liberia, Ghana

SIERRA LEONE

MLs for cadmium in chocolate containing or declaring $\geq 50\%$ to $< 70\%$ total cocoa solids on a dry matter basis; and chocolate containing or declaring $\geq 70\%$ total cocoa solids on a dry matter basis, REP18/CF para 67 (i) and (ii)

Main issues:-

The 77th JECFA Meeting (2013) conducted an exposure assessment to cadmium from the consumption of cocoa and cocoa-derived products. JECFA concluded that cadmium exposure for high consumers of cocoa and cocoa products was not a health concern. CCCF8 (2014) decided that lack of MLs could however threaten exports of some member countries thus the decision to set MLs for cadmium in the products.

Advance an ML of 0.8 mg/kg for Chocolate containing or declaring $\geq 50\%$ to $< 70\%$ total cocoa solids on a dry matter basis for adoption at Step 5/8 by CAC41.

Advance an ML of 0.9 mg/kg for chocolate containing or declaring $\geq 70\%$ total cocoa solids on a dry matter basis for adoption at Step 5/8 by CAC41.

RECOMMENDATION POSITION

Sierra Leone support CCCF12 to advance the following MLs for adoption at Step 5/8:

- Advance an ML of 0.8 mg/kg for Chocolate containing or declaring $\geq 50\%$ to $< 70\%$ total cocoa solids on a dry matter basis for adoption at Step 5/8 by CAC41.

LIBERIA

Background/Issue

The 77th JECFA Meeting (2013) conducted an exposure assessment to cadmium from the consumption of cocoa and cocoa-derived products. JECFA concluded that cadmium exposure for high consumers of cocoa and cocoa products was not a health concern. CCCF8 (2014) decided that lack of MLs could however threaten exports of some member countries thus the decision to set MLs for cadmium in the products.

Recommendations

- CCCF12 agreed to advance the following MLs for adoption at Step 5/8:
- Advance an ML of 0.8 mg/kg for chocolate containing or declaring $\geq 50\%$ to $< 70\%$ total cocoa solids on a dry matter basis for adoption at Step 5/8 by CAC41.
- Advance an ML of 0.9 mg/kg for chocolate containing or declaring $\geq 70\%$ total cocoa solids on a dry matter basis for adoption at Step 5/8 by CAC41.

Liberia supports the adoption of the proposed MLs.

GHANA

POSITION: We support the adoption of the following MLs at Step 5/8 by CAC41:

an ML of 0.8 mg/kg for Chocolate containing or declaring $\geq 50\%$ to $< 70\%$ total cocoa solids on a dry matter basis and an ML of 0.9 mg/kg for chocolate containing or declaring $\geq 70\%$ total cocoa solids on a dry matter basis.

RATIONALE: Presence of cadmium in food should be kept at the barest minimum due to the health risk with its consumption. The proposed MLs were derived using the ALARA principle. A 95% cut-off point (a 5% rejection rate) was used for data from Latin America and the Caribbean. It is to be noted that use of world-wide data would not have reflected the reality of all cocoa producing countries resulting in as much as 27% rejection rates in some instances. This approach has been used because of the JECFA conclusion that cadmium exposure for high consumers of cocoa and cocoa products was not a health concern.

The issue in question here is therefore basically a trade issue.

MLs for methylmercury in fish (REP 18/CF Paras. 91 (i), (iii) and (iv), Appendix IV-Part A
(Proposed Draft)

Comments of Sierra Leone, Liberia, Ghana

SIERRA LEONE

Adoption at Step 5/8 and revocation of GLs for Methylmercury

MLs for tuna, alfonsino, marlin and shark; and the GLs for methylmercury in predatory and non-predatory fish REP18/CF para 91 (i) and (iii)

Main issues:-

JECFA in 2003 revised the PTWI for methylmercury from 3.3 to 1.6 ug/kg bw. As a follow-up, CCCF7 (2013) discussed the guideline levels (GLs) for methylmercury in fish (1mg/kg) and predatory fish (0.5 mg/kg) and agreed to a review.

The basis for the review being that the current GLs did not take into account net effects of fish consumption resulting from adverse contributions from methylmercury exposure as against beneficial contributions from nutrients in fish.

CCCF11 (2017) agreed to establish MLs for methylmercury in fish based on the ALARA principle

RECOMMENDATION POSITION

Sierra Leone endorse the CCCF12 on the compromised MLs of 1.2mg/kg for tuna as a group to CAC for adoption at step 5/8 however do not support the adoption of these MLs of 1.5mg/kg for alfonsino, 1.7mg/kg for marlin and 1.6mg/kg for shark

LIBERIA

Background/Issue

JECFA in 2003 revised the PTWI for methyl-mercury from 3.3 to 1.6 ug/kg bw. As a follow-up, CCCF7 (2013) discussed the guideline levels (GLs) for methyl-mercury in fish (1mg/kg) and predatory fish (0.5 mg/kg) and agreed to a review.

The basis for the review being that the current GLs did not take into account net effects of fish consumption resulting from adverse contributions from methyl-mercury exposure as against beneficial contributions from nutrients in fish.

CCCF11 (2017) agreed to establish MLs for methyl-mercury in fish based on the ALARA principle

Recommendations

CCCF12 agreed to advance the following MLs to CAC for adoption at Step 5/8:

CCCF12 agreed on a compromise ML of 1.2 mg/kg for tuna as a group after much discussion with diverse proposals being put forward (values ranging from 1.1 to 1.7 were proposed). Liberia supports the adoption of the ML of 1.2 mg/kg for tuna as a group.

CCCF12 agreed on MLs of 1.5mg/kg for alfonsino, 1.7 mg/kg for marlin and 1.6mg/kg for shark. Liberia does not support adoption of these MLs.

GHANA

POSITION: We support the adoption of the ML of 1.2 mg/kg for tuna as a group. However Ghana does not support the adoption of MLs of 1.5mg/kg for alfonsino, 1.7 mg/kg for marlin and 1.6mg/kg for shark.

RATIONALE: A value of 1.2 mg/kg was obtained based on the ALARA principle and in line with the criteria for establishing MLs in the GSCTFF and after analysis of the available occurrence data for all tuna.

However data on methylmercury in these species of fish (alfonsino, marlin and shark is lacking from Ghana and other Africa countries. Hence more data is needed before MLs can be set for these species.

COP for the prevention and reduction of dioxins, dioxin-like PCBs and non dioxin-like PCB contamination in food and feed (CXC 62-2006) REP 18/CF, Para. 98, Appendix V

Comments of Sierra Leone, Ghana

SIERRA LEONE

Code of Practice (COP) for the prevention and reduction of dioxins, dioxin-like PCBs and non-dioxin-like PCB contamination in food and feed RE18/CF para 98

Main issues:-

A COP for the prevention and reduction of dioxins and dioxin-like PCBs (Polychlorinated biphenyls) contamination in food and feed was adopted in 2006.

Since that time, new contamination pathways have been found which require that additional management measures be added to the COP. More information is also now available on the carry-over of dioxins and PCBs in foods and feeds of animal origin. JECFA 80 (2015) performed a risk assessment on the toxicity of non-dioxin like (NDL) PCBs and the outcome needs to be incorporated into the COP. Finally, most of the recommended practices to reduce DL-PCBs are also applicable to NDL-PCBs, so the term DL-PCBs could be replaced with the general term PCBs which includes DL-PCBs and NDL-PCBs

RECOMMENDATION POSITION

Sierra Leone recommend the decision to adopt the revised COP at Step 5/8

GHANA

POSITION: We support the decision to adopt the revised COP at Step 5/8

RATIONALE: PCBs are widespread persistent environmental pollutants which are known to survive over a long time in the environment. They are classified as Group 1 carcinogens and cause a wide range of adverse health effects such as endocrine disruption and neurocognitive development problems in children.

It has become necessary to revise the current COP to include the additional measures for dioxins and dioxin-like PCBs as well as the mitigation measures for non-dioxin-like PCBs.

- **Committee on Food Additives**
- **Comité sur les additifs alimentaires**
- **Comité sobre aditivos alimentarios**

Proposed draft Specifications for the Identity and Purity of Food Additives (CXM 6) (REP18/FA Para. 30(i), Appendix III)(REP18/FA Paras.121(ii) and (iii), Appendix IX, part B)

Comments of Gambia, the Philippines, Ghana

GAMBIA

BACKGROUND: The identity and purity specification of the listed food additives has been developed and published by JECFA upon request by CCFA. The CCFA50 recommends adoption of the specifications.

POSITION: Gambia supports the adoption at step 5/8 of the specifications as provided in appendix III of REP18/FA.

RATIONALE: JECFA, as the risk assessment body for the CAC on food additives is the primary source for safety evaluation for CCFA and responsible for the development of the specifications.

PHILIPPINES

The Philippines supports the adoption of the specifications designated as “Full” for the following food additives:

1. Brilliant blue FCF (R) (INS 133)
2. β -Carotene-rich extract from *Dunaliella salina* (N)
3. Fast Green FCF (R) (INS 143)
4. Gum ghatti (R) (INS 419)
5. Microcrystalline cellulose (R) (INS 460(i))
6. Silicon dioxide, amorphous (R) (INS 551)
7. Sodium aluminium silicate (R) (INS 554)
8. Steviol glycosides (R) (INS 960)
9. Sucrose esters of fatty acids (R) (INS 473)

Rationale:

Based from the 84th JECFA meeting last 6-15 June 2017, the food additives (Brilliant blue FCF (R) (INS 133), β -Carotene-rich extract from *Dunaliella salina* (N), Fast Green FCF (R) (INS 143) and Gum ghatti (R) (INS 419) are evaluated toxicologically and concluded that dietary exposure to these additives do not present any health concern for any age group. While the food additives (Microcrystalline cellulose (R) (INS 460(i)), Silicon dioxide, amorphous (R) (INS 551), Sodium aluminium silicate (R) (INS 554), Steviol glycosides (R) (INS 960) and Sucrose esters of fatty acids (R) (INS 473)) were re-evaluated by JECFA and the specifications were revised and removed the tentative status.

GHANA

POSITION: We support the adoption at step 5/8 of the specifications as provided in appendix III of REP18/FA.

RATIONALE: Based on the extensive work by JECFA to completely evaluate the safety of the recommended food additives. JECFA is also responsible for the development of the specifications.

Food-additive provisions of the General Standard for Food Additives (GSFA) (CXS 192-1995) (Draft and proposed draft) (REP18/FA Paras. 30(ii), 111(i) and 121(iii), Appendix V, part A)

Comments of Philippines, Ghana

PHILIPPINES

A.1- Proposed draft and revision of adopted provisions in Table 1 and 2 related to FC 02.1.2, 02.1.3, 04.1.2.2, 04.1.2.3, 04.1.2.5, 04.1.2.6

Food Category No. 02.1.2 Vegetable oils and fat

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|----------------------|---------|------|------|-------------------|-----------|--|--|---|
| LECITHIN | 322(i) | 8 | 2018 | GMP | 277 | Philippine supports the adoption of the food additive with the new note "excluding use in virgin oils and olive oils." | Adopted at GMP with Note 277 For adoption at Step 8 | Support |
| TRICALCIUM CITRATE | 333(ii) | 8 | 2018 | GMP | 277, XS33 | Philippine supports the adoption of the food additive with the new note "XS33" | Adopted at GMP with Note 277, XS33 For adoption at Step 8 | Support |
| TRIPOTASSIUM CITRATE | 332(ii) | 8 | 2018 | GMP | 277, XS33 | Philippine supports the adoption of the food additive with the new note "XS33" | Adopted at GMP with Note 277, XS33 For adoption at Step 8 | Support |

Food Category No. 02.1.3 Lard, tallow, fish oil, and other animal fats

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41st CAC |
|---------------------------------------|------------|-------------|-------------|--------------------------|--------------|---|--|---|
| LECITHIN | 322 (i) | 8 | 2018 | GMP | | Philippine supports the adoption of the food additive since the use is technologically justified | Adopted ML at GMP For adoption at Step 8 | Support |
| MONO- AND DIGLYCERIDES OF FATTY ACIDS | 471 | 8 | 2018 | GMP | A2, XS211 | Philippine supports the adoption of the food additive at GMP with note XS211 and new note "Only for use as an emulsifier in fish oil at GMP, or as an antifoaming agent in oils and fats for deep frying conforming to the Standard for Edible Fats and Oils Not Covered by Individual Standards (CODEX STAN 19-1981)"; | Adopted at GMP with Note XS211, A2 For adoption at Step 8 | Support |

A.3 - Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the exception of food additives provisions with the function of colour and sweetener
Food Category No. 01.1.2 Other fluid milk (plain)

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|-------------------|----------|------|------|-------------------|-------|---|--|---|
| TRISODIUM CITRATE | 331(iii) | 5/8 | 2018 | GMP | A18 | Philippine supports the adoption of the food additive at GMP with new note "for use in UHT treated milks only". Trisodium citrate is listed in Table 3 of the GSFA for use in all food categories and has been evaluated by JECFA with an ADI "not specified" supporting a level of GMP, thus generally considered as safe. | Adopted at GMP with Note A17 For adoption at Step 8 | Support |

A.4 - Proposed draft provisions related to FC 01.6.4 (Processed cheese)

Food Category No. 01.6.4 Processed cheese

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|----------|-----|------|------|-------------------|-------|--|---|---|
| NISIN | 234 | 8 | 2018 | 12.5 | 233 | Comment Philippines supports to adopt 12.5 mg/kg. Nisin is useful for control of bacterial growth in processed cheese block and cheese spread | Adopted at 12.5 mg/kg with Note 233 For adoption at Step 8 | Support |

A.5 - Proposed draft provisions in Table 1 and 2 of the GSFA in food categories 09.0 through 016.0, with the exception of those additives with technological functions of colour or sweetener, adipates, nitrites and nitrates and the provisions related to FC 14.2.3

Food Category No. 12.4 Mustard

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|-------------|------------|------|------|-------------------|-------|---|---|---|
| TOCOPHEROLS | 307a, b, c | 8 | 2018 | 200 | | Philippines support the adoption at 200 mg/kg | Adopted at 200mg/kg For adoption at Step 8 | Support |

Food Category No. 12.6.1 Emulsified sauces and dips (e.g. mayonnaise, salad dressing, onion dip)

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|--|---------|------|------|-------------------|-------|--|--|---|
| POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID | 476 | 5/8 | 2018 | 5000 | | Philippines supports eWG proposal to adopt at 5000 mg/kg | Adopted at 5000mg/kg For adoption at Step 5/8 | Support |
| PROPYLENE GLYCOL ALGINATE | 405 | 8 | 2018 | 8000 | | Philippines supports eWG proposal to adopt at 8000 mg/kg | Adopted at 8000 mg/kg For adoption at Step 8 | Support |
| SORBITAN ESTERS OF FATTY ACIDS | 491-495 | 8 | 2018 | 5000 | | Philippines supports eWG proposal to adopt at 8000 mg/kg | Adopted at 5000 mg/kg For adoption at Step 8 | Support |

Food Category No. 12.6.3 Mixes for sauces and gravies

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41st CAC |
|-----------------|-------------------|-------------|-------------|--------------------------|--------------|---|---|---|
| TARTRATES | 334, 335(ii), 337 | 8 | 2018 | 5000 | 45, 127 | Philippines supports to adopt at 5000 mg/kg | Adopted at 5000 mg/kg with Note 45, 127 For adoption at Step 8 | Support |
| TOCOPHEROLS | 307a, b, c | 8 | 2018 | 300 | 127 | Philippines supports to adopt at 300 mg/kg | Adopted at 300 mg/kg with Note 127 For adoption at Step 8 | Support |

Food Category No. 12.6.4 Clear sauces (e.g. fish sauce)

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41st CAC |
|------------------|------------|-------------|-------------|--------------------------|--------------|---|---|---|
| SODIUM DIACETATE | 262(ii) | 5/8 | 2018 | 2500 | XS 302 | Philippines supports to adopt at 2500 mg/kg with Note XS302 | Adopted at 2500 mg/kg with Note XS302 For adoption at Step 5/8 | Support |

Food Category No. 13.1.1 Infant formulae

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|-------------|------------|------|------|-------------------|---------|---|---|---|
| TOCOPHEROLS | 307a, b, c | 8 | 2018 | 10 | 72, A12 | Philippines supports to adopt at 10 mg/kg. in alignment with the Codex Stan 72-1981 Codex standard for Infant formula, and formula for special medical purposes for infants | Adopted at 10 mg/kg with Note 72, A12 For adoption at Step 8 | Support |

Food Category No. 13.1.2 Follow-up formulae

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|-------------|------------|------|------|-------------------|-------|--|--|---|
| TOCOPHEROLS | 307a, b, c | 8 | 2018 | 30 | 72 | Agree with 30mg/l with Note 72 as reconstituted in alignment with CODEX STAN 156-198 | Adopted at 30 mg/kg with Note 72 For adoption at Step 8 | Support |

Food Category No. 13.1.3 Formulae for special medical purposes for infants

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|----------|-----|------|------|-------------------|-------|--------------------|--------------------------------------|---|
|----------|-----|------|------|-------------------|-------|--------------------|--------------------------------------|---|

| | | | | | | | | |
|-------------|------------|---|------|----|---------|--|---|----------------|
| TOCOPHEROLS | 307a, b, c | 8 | 2018 | 10 | 72, A12 | Philippines supports to adopt 10mg/kg in alignment with the Codex Stan 72-1981 Codex standard for Infant formula, and formula for special medical purposes for infants | Adopted at 10 mg/kg with Note 72, A12 For adoption at Step 8 | Support |
|-------------|------------|---|------|----|---------|--|---|----------------|

Food Category No. 13.2 Complementary foods for infants and young children

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|-------------|------------|------|------|-------------------|-------|--|---|---|
| TOCOPHEROLS | 307a, b, c | 8 | 2018 | 300 | 15 | Philippines supports proposal to adopt at 300 mg/kg on the fat for oil basis. Alignment with standard 73-1981 and 74-1981. | Adopted at 300 mg/kg with Note 15 For adoption at Step 8 | Support |

Food Category No. 14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|-------------------------------------|------------|------|------|-------------------|-------|--|--|---|
| TOCOPHEROLS 8 2018 200 mg/kg A35 | 307a, b, c | 8 | 2018 | 200 | A35 | Philippines supports to adopt at 200mg/kg as an antioxidant. | Adopted at 200 mg/kg with Note A35 For adoption at Step 8 | Support |

Food Category No. 15.1 Snacks - potato, cereal, flour or starch based (from roots and tubers, pulses and legumes)

| Additive | INS | Step | Year | Max Level (mg/kg) | Notes | Philippine Comment | CODEX COMMITTEE/ COMMISSION DECISION | SC/TF Proposed Philippine Position for the 41 st CAC |
|------------------------------------|---------------|------|------|-------------------|-------|---|--|---|
| TOCOPHEROLS 8 2018 200 mg/kg | 307a, b, c | 8 | 2018 | 200 | | Philippines supports the EWG proposal to adopt at 200mg/kg as an antioxidant. | Adopted at 200 mg/kg For adoption at Step 8 | Support |

GHANA

POSITION: Ghana supports the adoption of the food additives in both step 8 and 5/8 as recommended by the committee.

RATIONALE: The technological justification for their use as well as their safety in the referred products has been ascertained and are consistent with the preamble of the GSFA.

Revision of the *Class Names and the International Numbering System for Food Additives* (CXG 36-1989) (Proposed draft) (REP18/FA Paras. 30(ii) and 121(i) Appendix IX, part A2) (REP18/FA Para.149, Appendix IX, part A1)

*Comments of Ghana***GHANA**

POSITION: We support the amendments to the INS numbers.

RATIONALE: The amendments will add clarity and common understanding of the food additives as well as ensuring that the true identity is provided in the case of styriol glycosides.

Revised food-additive provisions of the GSFA in relation to the alignment of the annexes on canned mangoes, canned pears and canned pineapples of the *Standard for Certain Canned Fruits* (CXS 319-2015) and 14 standards for fish and fish products (REP18/FA Paras. 48(i) points c and d, Appendix V, part B)

*Comments of Ghana***GHANA**

POSITION: We support the recommendation to align the commodity standards to the GSFA

RATIONALE: This is in compliance to the Codex procedural manual.

Revised food-additive sections of the Standard for Certain Canned Fruits (CXS 319-2015) and the Standards for Canned Salmon (CXS 3-1981); Canned Shrimps or Prawns (CXS 37-1991); Canned Tuna and Bonito (CXS 70-1981); Canned Crab Meat (CXS 90-1981); Canned Sardines and Sardine-Type Products (CXS 94-1981); Canned Finfish (CXS 119-1981); Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes (CXS 167-1989); Dried Shark Fins (CXS 189-1993); Crackers from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish (CXS 222-2001); Boiled Dried Salted Anchovies (CXS 236-2003); Salted Atlantic Herring and Salted Sprat (CXS 244-2004); Sturgeon Caviar (CXS 291-2010); Fish Sauce (CXS 302-2011) and Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish (CXS 311-2013) (REP18/FA Paras. 48(i) points a and b and 30(ii), Appendix IV)

Comments of Philippines, Ghana

PHILIPPINES

The Philippine supports proposed amendments to the food additive provisions of the codex commodity standards for fish and fish product standards:

Canned Salmon (CXS 3-1981);
 Canned Shrimps or Prawns (CXS 37-1991);
 Canned Tuna and Bonito (CXS 70-1981);
 Canned Crab Meat (CXS 90-1981);
 Canned Sardines and Sardine-Type Products (CXS 94-1981);
 Canned Finfish (CXS 119-1981);
 Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes (CXS 167-1989);
 Dried Shark Fins (CXS 189-1993);
 Crackers from Marine and Freshwater Fish,
 Crustacean and Molluscan Shellfish (CXS 222-2001);
 Boiled Dried Salted Anchovies (CXS 236-2003);
 Salted Atlantic Herring and Salted Sprat (CXS 244-2004);
 Sturgeon Caviar (CXS 291-2010); Fish Sauce (CXS 302-2011) and
 Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish (CXS 311-2013).

Rationale:

The proposed amendments to include a general reference to the GSFA in Section 4 of the commodity standards for fish and fish products, recognizes the GSFA as the single reference point for food additives within CODEX.

GHANA

POSITION: We support the recommendation to align the commodity standards to the GSFA.

RATIONALE: This is in compliance to the Codex procedural manual.

Revised food-additive sections of Standards for Milk Powders and Cream Powder (CXS 207-1999), a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (CXS 251-2006); and Edible Casein Products (CXS 290-1995) (REP18/FA Para. 30(ii))

Comments of Gambia, Ghana

GAMBIA

BACKGROUND: The Codex procedural manual recommends that commodity standards should make cross reference to the GSFA on provisions related to food additives. This is was intended to avoid Codex texts having different provision for use of food additives in similar commodity. There GSFA was adopted as a single reference for food additives.

POSITION: The Gambia supports the recommendation to align the commodity standards to the GSFA.

RATIONALE: This is in compliance to the Codex procedural manual.

GHANA

POSITION: We support the recommendation to align the commodity standards to the GSFA.

RATIONALE: This is in compliance with the Codex procedural manual and will ensure that GSFA is the single reference for food additives.

- **Committee on pesticide residues**
- **Comité du codex sur les résidus de pesticides**
- **Comité del codex sobre residuos de plaguicidas**

MRLs for different combinations of pesticide/commodity(ies) (Proposed draft) (REP18/PR Para. 112, Appendix II)

Comments of Gambia, Ghana

GAMBIA

BACKGROUND: The following compounds have been evaluated by JMPR and the CCPR is recommending their adoption during CAC41. Chlormequat, Oxamyl, Fenpyroximate, Fenpropimorph, Tebuconazole, Cyprodinil, Trifloxystrobin, Difenconazole, Azoxystrobin, Prothioconazole, Spinetoram, Fluopyram, Isopyrazam, Saflufenacil, Picoxystrobin, Imazapyr, Imazamox, Flupyradifurone, Quinclorac, Bicyclopyrone, Fenazaquin, Fenpyrazamine, Isoprothiolane, Fosetyl-Aluminium, Trifloxystrobin, Chlormequat, Oxamyl, Fenpyroximate, Fenpropimorph, Cyprodinil, Trifloxystrobin, Prothioconazole, Spinetoram, Fluopyram, Isopyrazam, Trifloxystrobin.

POSITION: The Gambia supports the adoption of Proposed draft MRLs at Step 5/8 (REP18/PR Appendix II).

RATIONALE: Estimation of MRLs were based on residue data set obtained from trials conducted according to GAP.

GHANA

POSITION: We Support the adoption of Proposed draft MRLs at Step 5/8.

RATIONALE: Estimation of MRLs were based on residue data set obtained from trials conducted according to GAP.

Revision of the Classification of Food and Feed (CXM 4-1989): Type 04: Nuts, seeds and saps Type 05: Herbs and spices (Proposed draft and draft) (REP18/PR Paras. 118 and 120) (Appendices VII-Part A & VIII-Part A)

Comments of Ghana

GHANA

POSITION: We support the adoption of the Draft and proposed draft revision of the classification: class A for all groups in Type 04 (Groups 022,023,024,025)

RATIONALE: The commodities under Type 04 (Groups 022, 023, 024 and 025) Nuts, Seeds and Sap) meet the criteria for crop grouping. They will support the establishment of commodity group MRLs as opposed to MRLs individual commodities. The establishment of crop groups recognizes the fact that residue trials cannot be carried out on all crops in the group because of economic limitations.

POSITION: We support the adoption of Type 05 commodities (Groups 027 Herbs and Group 028 Spices).

RATIONALE: The commodities under Type 05 (Groups 027 and 028) meet the criteria for crop grouping. They are similar in morphology and have the same crop production practices

Tables on examples of representative commodities for: Types 04 and 05 Table 04: Nuts, seeds and saps Table 05: Herbs and spices (Proposed draft) REP18/PR Para. 127, Appendices VII-Part B & VIII-Part B

Comments of Ghana

GHANA

POSITION: Ghana supports examples of selection of the following representative crops. The work being done on these groups, based on the similarities of plant morphology, crop production practices, growth habits and commodity potential for pesticide residues.

RATIONALE: This is because the proposed classifications adequately and fairly cover most of the crop species which are cultivated in the country for both export and local consumption. The selection of representative crops will facilitate the setting of group MRLs through extrapolation of the MRLs of the representative crops to the commodities in the group and/or subgroup

- **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**

RMR for gentian violet (Draft) (REP18/RVDF) (Para. 37, Appendix II)

Comments of Philippines, Ghana

PHILIPPINES

Background

The recent CCRVDF24 agreed to forward the RMR on gentian violet to CAC41 for adoption at Step 8. CCRVDF24 noted that the current RMR text would allow member countries to choose appropriate risk management approaches to prevent residues of Gentian Violet in food. However, the United States of America, Ecuador, Honduras and Nicaragua expressed reservations to advancing the RMR that includes the last sentence as written (i.e. "This can be accomplished by not using gentian violet in food producing animals").

General Comments on CL 2018/30-FA:

The Philippines still support the RMR without the use of the last sentence. The language used in the last sentence of the RMR was overly restrictive and it could limit national authorities from applying other risk management measures they considered more appropriate.

In the Philippines, registration of products with Gentian violet is both listed in the pharmaceutical and veterinary products list, banning of the product particularly for use in food-producing animals but has existing permission for use to non-food producing animals and humans, would complicate monitoring programs of the competent authorities.

The committee may consider the option to give flexibility to regulatory authorities to classify the use of Gentian violet in the food animals, moreover, in the JECFA evaluation; we would like to inquire if there is a possibility to establish the risk of residues of Gentian violet if this is only used as a topical treatment to skin and eye diseases and not as a systemic introduction to the animal.

In the fishery sector, the regulatory authority has already issued a policy guideline on its control measures in the use of Gentian violet in aquaculture settings by virtue of *BFAR Administrative Order 256 series of 2015: Declaring malachite green and gentian violet as health hazards and prohibiting their use in food fish production and trade*. In the animal feeds there is no approval for use of Gentian violet as mold inhibitor in feeds.

Therefore, the Philippines express reservation for adoption of the RMR (as expressed in "CL 2018/30-FA") for final adoption as Codex text. Nevertheless, we are not opposing the adoption of the RMR that would advise members to prevent residues of gentian violet in food.

Rationale:

The statement expressed in “CL 2018/30-FA” includes the last sentence: “This can be accomplished by not using gentian violet in food producing animals”, which the Philippines finds to be overly restrictive and would limit the national authorities from applying other risk management measures that are more appropriate.

GHANA

POSITION: Ghana supports adoption of this standard.

RATIONALE: Gentian violet is genotoxic and carcinogenic hence It's MRL could not be recommended. There is also limited information on residues and it is similar to Malachite Green.

MRLs for amoxicillin (finfish fillet, muscle); ampicillin (finfish fillet, muscle); lufenuron (salmon and trout fillet); monepantel (cattle fat, kidney, liver, muscle) (Proposed draft) (REP18/RVDF) (Paras. 60, 64, 77 and 79, Appendix IV)

Comments of Kazakhstan, Philippines, Ghana

KAZAKHSTAN**Amoxicillin**

The Kazakhstan supports the proposed draft MRLs for amoxicillin in finfish because they do not raise any consumer safety concerns. These proposed draft MRLs are the same as those in the technical regulations of the Eurasian Economic Union "On the Safety of Fish and Fishery Products" of the TR EAEU 040/2016.

Ampicillin

The Kazakhstan support the proposed draft MRLs for ampicillin in finfish because they do not raise any consumer safety concerns. These proposed draft MRLs are the same as those in the technical regulations of the Eurasian Economic Union "On the Safety of Fish and Fishery Products" of the TR EAEU 040/2016.

PHILIPPINES

The Philippines would like to express its support for the established MRLs for amoxicillin (finfish fillet, muscle); ampicillin (finfish fillet, muscle); flumethrin (honey); lufenuron (salmon and trout fillet), monepantel (cattle fat, kidney, liver, muscle) as evaluated by the 85th JECFA as follows:

AMOXICILLIN (antimicrobial agent)

| Species | Tissue | MRLs (µg/kg) | Step | JECFA |
|----------------------|---------------------|--------------|------|-------|
| Finfish ^a | Fillet ^b | 50 | 5/8 | 85 |
| | Muscle | 50 | 5/8 | 85 |

^a The term “finfish” includes all fish species.

^b Muscle plus skin in natural proportion.

AMPICILLIN (antimicrobial agent)

| | |
|--|---|
| Microbiological Acceptable Daily Intake (mADI) | 0–0.003 mg/kg bw based on a no-observed-adverse-effect level (NOAEL) equivalent to 0.025 mg/kg bw per day for increase in population(s) of ampicillin-resistant bacteria in the gastrointestinal tract in humans, and using a safety factor of 10 (for the variability in the composition of the intestinal microbiota within and between individuals). |
| Acute Reference Dose (ARfD): | 0.012 mg/kg bw based on the microbiological end-point. |
| Estimated Chronic Dietary Exposure (GECDE): | 0.29 µg/kg bw per day (for the general population), which represents 10% of the upper bound of the ADI. |
| Estimated Acute Dietary Exposure (GEADE): | 1.9 µg/kg bw per day (for the general population), which represents 16% of the ARfD. 1.7 µg/kg bw per day (for children), which represents 14% of the ARfD |

Residue Definition: Ampicillin.

| Species | Tissue | MRLs (µg/kg) | Step | JECFA |
|----------------------|---------------------|--------------|------|-------|
| Finfish ^a | Fillet ^b | 50 | 5/8 | 85 |
| | Muscle | 50 | 5/8 | 85 |

^a The term “finfish” includes all fish species.

^b Muscle plus skin in natural proportion.

Note: The 85th JECFA recommended an MRL of 50 µg/kg for ampicillin in finfish muscle and in finfish muscle plus skin in natural proportion, the same as that recommended for amoxicillin, because the modes of action, the physicochemical properties and the toxicological and pharmacokinetic profiles of amoxicillin and ampicillin are very similar.

LUFENURON (insecticide)

| | |
|---|---|
| Acceptable Daily Intake (ADI) | 0–0.02 mg/kg bw based on the NOAEL of 1.93 mg/kg bw per day for tonic-clonic seizures and findings in lungs, gastrointestinal tract, liver and urinary tract in a 2-year dietary study in rats, and using a safety factor of 100 (10 for interspecies variability and 10 for intraspecies variability). |
| Acute Reference dose (ARfD): | Unnecessary, in view of lufenuron low acute oral toxicity and the absence of developmental toxicity and other toxicological effects likely to be elicited by a single dose. |
| Estimated chronic dietary exposure (GECDE): | 1.1 µg/kg bw per day (for the general population), which represents 5.5% of the upper bound of the ADI. As lufenuron is also used as pesticide the overall dietary exposure was estimated. The assumptions and detailed results will be displayed in the JECFA 85 report. Results below are only for use as veterinary drug. |

Residue Definition: Lufenuron

| Species | Tissue | MRLs (µg/kg) | Step | JECFA |
|---------|---------------------|--------------|------|-------|
| Salmon | Fillet ^a | 1 350 | 5/8 | 85 |
| Trout | Fillet ^a | 1 350 | 5/8 | 85 |

^a Muscle plus skin in natural proportion.

MONEPANTEL (anthelmintic)

| | | | | |
|---|---|---------------------|-------------|--------------|
| Acceptable Daily Intake (ADI) | 0–0.02 mg/kg bw based on the NOAEL of 1.93 mg/kg bw per day for tonic-clonic seizures and findings in lungs, gastrointestinal tract, liver and urinary tract in a 2-year dietary study in rats, and using a safety factor of 100 (10 for interspecies variability and 10 for intraspecies variability). | | | |
| Acute Reference dose (ARfD): | Unnecessary | | | |
| Estimated chronic dietary exposure (GECDE): | 13.7 µg per kg bw per day (for the general population), which represents 68% of the upper bound of the ADI. | | | |
| | 5.0 µg per kg bw per day (for children), which represents 22% of the upper bound of the ADI. | | | |
| | 4.4 µg per kg bw per day (for infants), which represents 25% of the upper bound of the ADI. | | | |
| Residue Definition: | <u>Monepantel sulfone, expressed as monepantel</u> | | | |
| Species | Tissue | MRLs (µg/kg) | Step | JECFA |
| Cattle | Fat | 7 000 | 5/8 | 85 |
| | Kidney | 1 000 | 5/8 | 85 |
| | Liver | 2 000 | 5/8 | 85 |
| | Muscle | 300 | 5/8 | 85 |

Therefore, the Philippines support the adoption of the established MRLs at Step 5/8.

Rationale:

The 85th JECFA made an extensive risk assessment of the mentioned drugs/compounds accounting factors such as dietary exposure, antibiotic resistance, mode of action, toxicological properties, pharmacokinetics, chemical properties and other such factors.

GHANA

CCRVDf: Proposed Draft MRL for Amoxicillin (finfish fillet and muscle)

POSITION: Ghana supports the adoption of MRL at Step 5/8

RATIONALE: Draft MRL of 50µg/ kg for Amoxicillin in Finfish fillet and muscle was recommended for adoption at Step 5/8 (Appendix IV) based on JECFA assessment.

CCRVDf: Proposed Draft MRL for Ampicillin

POSITION: We support the adoption of MRL at Step 5/8

RATIONALE: Based on JECFA 85th assessment of the MRLs of Ampicillin {Finfish fillet (50µg/kg) & Finfish muscle (50µg/kg)} and subsequent recommendations.

CCRVDf: Proposed Draft MRL for Lufenuron

POSITION: We support the adoption of MRL at Step 5/8

RATIONALE: Based on JECFA 85th assessment of the MRLs of Lufenuron {Salmon (1350µg/kg) and Trout (1350 µg/kg)} and subsequent recommendations.

CCRVDf: Proposed Draft MRL for Monepantel

POSITION: We support the adoption of MRL at Step 5/8

RATIONALE: Based on JECFA 85th assessment of the MRLs of Monepantel {Cattle (Fat 7000µg/kg), (kidney 1000 µg/kg), (Liver 2000 µg/kg) and (Muscle 300 µg/kg)} and subsequent recommendations.

- Codex Committee on Methods of Analysis and Sampling
- Comité du codex sur les méthodes d'analyse et d'échantillonnage
- Comité del codex sobre métodos de análisis y toma de muestras

Methods of analysis / performance criteria for provisions in Codex standards (for inclusion in CXS 234-1999) (REP18/MAS) (Para. 22, Appendix II)

Comments of Mexico

MEXICO

PART 1. METHODS OF ANALYSIS FOR ADOPTION BY THE 41ST CODEX ALIMENTARIUS COMMISSION

A. CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Methods of analysis for provisions in the Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (CXS 72-1981)

| Commodity | Provision | Method | Principle | Proposed Type |
|------------------|------------------|------------------------------------|--------------------|----------------------|
| Infant Formula | Biotin | EN 15607 | HPLC- fluorescence | III |
| | | AOAC 2016.02 | HPLC-UV | II |
| | Vitamin D | EN 12821 | HPLC-UV | III |
| | | AOAC 995.05 | HPLC-UV | III |
| | | AOAC 2016.05 / ISO 20636 | LC-MS | II |
| | Chloride | AOAC 2016.03 / ISO 21422 IDF 242 | Potentiometry | II |

B. CODEX COMMITTEE ON MILK AND MILK PRODUCTS

| Commodity | Provisions | Method | Principle | Type |
|------------------|-------------------|------------------------------|----------------------------------|-------------|
| Dairy permeate | Milkfat | ISO 1736 IDF 009 | Gravimetry (Röse-Gottlieb) | I |
| Dairy permeate | Nitrogen | ISO 8968-1 IDF 020-1 | Titrimetry (Kjeldahl) | I |
| Dairy permeate | Moisture* | ISO 5537 IDF 026 | Gravimetry (drying at 87°C) | I |
| Dairy permeate | Ash | NMKL 173 | Gravimetry (ashing at 550 °C) | IV |
| Cheese | Propionic acid | ISO/TS 19046-1 IDF/RM 233-1 | Gas Chromatography - FID | IV |
| Cheese | Propionic acid | ISO/TS 19046-2 IDF/RM 233-2 | Ion exchange chromatography-UV | IV |
| Emmental | Propionic acid | ISO/TS 19046-1 IDF/RM 233-1 | Gas Chromatography - FID | IV |
| Emmental | Propionic acid | ISO/TS 19046-2 IDF/RM 233-2 | Ion exchange chromatography - UV | IV |

(*) Moisture content excluding the water of crystallization of lactose.

C. CODEX COMMITTEE ON CEREALS, PULSES AND LEGUMES*Methods of analysis for quinoa*

| Provision | Method | Principle | Type |
|--|--------------------------|-----------------------|------|
| Moisture content | ISO 712 / AACCI 44-15.02 | Gravimetry | I |
| Protein Content (N x 6.25 in dry weight basis) | ISO 1871 | Titrimetry (Kjeldahl) | IV |

D. CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Performance Criteria for methods of analysis of methylmercury*

| Commodity | Provision | ML (mg/kg) | Min Appl. Range (mg/kg) | LOD (mg/kg) | LOQ (mg/kg) | Precision (%) Not more than | Recovery (%) | Examples of applicable Methods that meet the criteria | Principle |
|------------|----------------|------------|-------------------------|-------------|-------------|--------------------------------|--------------|---|----------------------------------|
| All Tuna | methylmercury* | 1.2 | 0.64 – 1.8 | 0.12 | 0.24 | 31 | 80 – 110 | EN 16801 | GC-ICP/MS |
| Alfonsino | methylmercury* | 1.5 | 0.82 – 2.2 | 0.15 | 0.30 | 30 | 80 – 110 | AOAC 988.11 EN 16801 | GC-electron capture GC-ICP/MS |
| All Marlin | methylmercury* | 1.7 | 0.95 – 2.5 | 0.17 | 0.34 | 30 | 80 – 110 | AOAC 988.11 EN 16801 | GC-electron capture GC-ICP/MS |
| Shark | methylmercury* | 1.6 | 0.88 – 2.3 | 0.16 | 0.32 | 30 | 80-110 | AOAC 988.11 EN 16801 | GC-electron capture GC-ICP/MS |

* Countries or importers may decide to use their own screening when applying the ML for methylmercury in fish by analysing total mercury in fish. If the total

mercury concentration is below or equal to the ML for methylmercury, no further testing is required and the sample is determined to be compliant with the ML.

If the total mercury concentration is above the ML for methylmercury, follow-up testing shall be conducted to determine if the methylmercury concentration is

above the ML. The ML also applies to fresh or frozen fish intended for further processing.

| | |
|------------------|------------|
| Fecha:22/05/2018 | Documento: |
|------------------|------------|

| 1 | 2 | (3) | 4 | 5 | (6) | (7) |
|-------------|---|---|---------------------------------------|---|------------------------------------|--|
| MGT1 | Capítulo No./ Número/ Anexo (ej. 3.1) | Párrafo/ Figura/ Tabla Nota (ej. Tabla 1) | Tipo de comentario² | Comentario (justificación para el cambio) por el MGT | Cambio propuesto por el MGT | Observaciones del Coordinador del GT por cada comentario presentado |

| | | | | | | |
|-------|------------------|---|-----------|--|--|--|
| SCMAS | Part 1 A. | Methods of analysis for provisions in the Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (CXS 72-1981) | te | <p>La norma ISO 20636 se encuentra en desarrollo para el 22-05-2018 la norma no esta disponible.</p> <p>La norma ISO 21422 e IDF 242 se se encuentra en desarrollo para el 22-05-2018 la norma no esta disponible.</p> | No ratificar la adopción de métodos no publicados en el momento de la reunión del CCMAS, | <p>Se pone además de manifiesto que el CCMAS y los países miembros no han podido evaluar el cumplimiento de los criterios establecidos en el manual de procedimientos.</p> <p>Estos métodos no fueron propuestos por el comité del producto fueron presentados por el organismo de normalización durante la asamblea.</p> <p>Uso poco claro de los signos “l” y “r” el CCMAS utiliza “l” para métodos idénticos y “r” esto no es claro ya que dicha nomenclatura no esta establecida en el manual de procedimientos.</p> |
| | Part D | Performance Criteria for methods of analysis of methylmercury* | ge | La tabla tiene una columna con el encabezado “Examples of applicable Methods that meet the criteria” | Eliminar la columna | No hay necesidad de sugerir métodos ya que la decisión del comité de producto fue la de publicar criterios de desempeño y no métodos. Por lo que si bien esta columna puede parecer orientativa para los países podría convertirse el limitativa en términos prácticos. |