



联合国粮农组织/世卫组织联合食品标准计划 食品法典委员会执行委员会

第八十三届会议

意大利罗马, 联合国粮农组织总部

2022年11月14-18日

严格审查 - 第4部分

(食典委秘书处编制)

A. 《泡菜标准》(CXS 223-2001) 修订提案

1. 根据大韩民国向食典委秘书处提交的《泡菜标准》(CXS 223-2001) 修订提案¹, 食品法典委员会执行委员会第八十一届会议(执委会第八十一届会议)指出, 由于该标准属于加工水果和蔬菜法典委员会的职责范围, 而该委员会自食品法典委员会第四十三届会议以来无限期休会, 因此, 将分发一份通函, 征求成员和观察员对该提案的意见。执委会第八十一届会议还指出, 对该通函的答复意见将纳入执委会第八十三届会议对新工作提案的严格审查, 其建议将提交食典委第四十五届会议审议²。
2. 《泡菜标准》(CXS 223-2001) 在食典委第二十四届会议(2001年)上首次通过, 并在食典委第四十届会议上(2017年)作了修正。该提案指出, 《泡菜标准》(CXS 223-2001) 下述章节可能需要修订: 第 2.1 节产品定义(a)(主要成分的命名)和(c)(生产条件), 第 3.1.3 节其他成分(总酸度), 以及第 4 节食品添加剂。
3. 需注意的是, 虽然加工水果和蔬菜法典委员会目前无限期休会, 但食典委已批准关于腰果和红薯干的新工作, 这些工作已列入加工水果和蔬菜法典委员会未来可能开展的工作之列。
4. 根据执委会第八十一届会议的决定, 食典委秘书处发布了一份通函³, 要求成员和观察员就以下方面提出意见: a) 食典委是否应启动程序, 开展《泡菜标准》修订提案中所述的新工作; b) 项目文件是否已包含足够信息, 还是需提供其他信息, 以便做出符合《食典程序手册》标准的决定, 以及 c) 其他泡菜生产国和消费国是否在该标准上述章节或其他章节具有类似或其他食品安全或质量问题, 以及是否准备提供其他数据。

¹ CX/EXEC 21/81/3, 第1-6段

² REP21/EXEC2, 第61-62段

³ CL 2021/91/OCS-EXEC

5. 通函于 2022 年 2 月发布，截止日期为 2022 年 7 月 15 日，该日期已两次延长。
6. 在对通函的答复工作中，已收到五个国家的意见；埃及、印度、印度尼西亚、日本和美国（见附件 I）。埃及、印度和印度尼西亚支持该提案，日本和美国则不支持，认为现有标准和当前泡菜贸易惯例并无差距，而且数据不足。
7. 请执委会第八十三届会议考虑所收到意见的数量和内容，向食典委第四十五届会议建议是否批准此项新工作提案。

B. 《果汁和果蜜的通用标准》（CXS 247-2005）拟议修订

8. 巴西已向食典委秘书处提交了一份《果汁和果蜜的通用标准》（CXS 247-2005）拟议修订。该标准由果蔬汁法典政府间特设工作组制定，该工作组于 2005 年被食典委第二十六届会议解散，目前属于加工水果和蔬菜法典委员会的职责范围，该委员会于 2020 年被食典委第四十三届会议无限期休会。
9. 拟议修订（见附件 II）涉及 CXS 247-2005 号文件附件，其中建议将葡萄汁单一最低参考白利糖度分为两组；一组为 *V. vinifera* 及其杂交种，最低白利糖度仍为 16.0；另一组为 *V. labrusca* 及其杂交种，最低白利糖度建议设为 14.0。拟议修订旨在提高 CXS 247-2005 的精确性，通过在标准附件中增加对 *V. labrusca* 及其杂交种葡萄的具体限制，准确反映 *V. labrusca* 所酿复原葡萄汁的最低白利糖度。
10. 提议者称，拟议修订将提高 CXS 247-2005 的精确性和覆盖面，有助于在葡萄汁贸易中更好应用，并提高透明度，这进而将推动国际贸易，促进不同区域的葡萄汁供应。
11. 拟议修订的背景和理由见附件 III。案文还建议向成员国发出一封通函，就食典委是否应通过拟议修订征求意见。
12. 提请执委会第八十三届会议审查该拟议修订，并就下一步举措提出建议。
13. 需指出，适用《食典程序手册》中的《食典标准及相关文本修正和修订程序指南》，特别是第 6 段。

C. 《乳脂产品标准》（CXS STAN 280-1973）修订提案

14. 在油脂法典委员会第二十七届会议上，伊朗提出一份讨论文件，讨论是否需要将《乳脂产品标准》（CXS 280-1973）中酥油（黄油）的铜和铁最大限量与《特定植物油标准》（CXS 210-1999）中的铜和铁最大限量保持一致。伊朗建议修订 CXS 280-1973 中的铜和铁限量，使之与 CXS 210-1999 中的限量一致，或者参照其他奶制品，从 CXS 280-1973 “附录-其他信息”所列酥油和黄油的“其他污染物”中删除铜和铁的含量。有意见提出，油脂法典委员会可能最适合负责此项工作，因为奶及奶制品法典委员会的工作范围虽涵盖 CXS 280-1973，但已经无限期休会。

15. 油脂法典委员会同意向执委会转交一项请求，供其审议并提出指导意见，阐明哪些机制可用于审议《乳脂产品标准》（CXS 280-1973）修订提案，从而解决对铜和铁最大限量的关切⁴。

16. 食典委执委会第八十二届会议建议按照《食典程序手册》向食典委秘书处提交一份项目文件（载于 CX/CAC 22/45/13 号文件），说明新工作提案建议将《乳脂产品标准》（CXS-280-1973）中的酥油（黄油）的铜和铁最大限量与《特定植物油标准》（CXS 210--1999）中的水平保持一致，随后发布一份通函，征求食典委成员对该新工作提案的意见。根据对通函的答复意见，执委会将向食典委提出今后工作方案⁵。

17. 通函⁶于 2022 年 9 月发布。在通函答复工作中，我们收到若干意见，并进行了汇编（见附件 IV）。

18. 请执委会第八十三届会议根据《程序手册》的要求，并考虑收到的意见数量和内容，审查是否批准此项新工作提案，并向食典委第四十五届会议提出建议。

D. 关于制定在监管框架内使用远程审计和核查的原则和准则的新工作提案

19. 食品进出口检验和认证系统法典委员会第二十五届会议审议了一份由澳大利亚编写的文件，内容关于在监管框架内使用信息和通信技术工具，这是全球新出现的问题之一。这项提案旨在考虑有关使用信息和通信技术工具这一替代核查手段作为现代监管框架的部分内容，食典委是否有必要提供指导。有意见指出，在 2019 冠状病毒病（COVID-19）疫情期间，这一问题变得更为重要，因为疫情改变了贸易格局，加快了替代核查措施开发和利用，提高了新技术采纳速度。

20. 食品进出口检验和认证系统法典委员会第二十五届会议同意成立电子工作组，由澳大利亚担任主席，新加坡和加拿大担任共同主席，负责制定一份关于“在监管框架内使用远程审计和核查”的讨论文件，并有可能根据食品进出口检验和认证系统法典委员会第二十五届会议的意见制定一份新的项目文件。

21. 成立电子工作组的信息已于 2021 年 8 月 20 日分发，注册截止日期为 2021 年 9 月 9 日。电子工作组以英文、法文和西班牙文开展工作。

22. 为协助制定讨论文件，电子工作组主席提出一系列有针对性的问题，向工作组成员征求对潜在新工作范围的意见，试图收集成员在远程审计和核查方面的经验、目标和优先重点相关信息，对讨论文件进行两轮磋商，对项目文件进行一轮磋商。

⁴ REP22/FO，第173-175段

⁵ REP22/EXEC1，第11-12段

⁶ CL 2022/58/OCS-EXEC

23. 此外，2022年6月21日，澳大利亚主办了世界贸易组织（世贸组织）卫生和植物检疫委员会的专题会议，重点探讨在监管框架内使用远程（线上）审计和核查。进出口检验和认证系统法典委员会主席 **Nicola Hinder PSM** 介绍了电子工作组的最新工作情况，并主持了两场专题会议，重点讨论使用远程审计的益处、挑战和机遇。在专题会议上，与会者强烈支持由进出口检验和认证系统法典委员会制定指导意见。
24. 2022年6月28日，进出口检验和认证系统法典委员会主席向食典委成员和观察员分发一封信函，简要介绍了根据食典程序提交远程审计新工作提案的快速程序。信函指出，新工作提案的讨论文件和项目文件首先以通函形式向所有食典成员和观察员分发，以征求意见。该项目文件经必要修正后，将提交执委会第八十三届会议（2022年11月）严格审查，以便食典委第四十五届会议（2022年11月）批准此项新工作。
25. 2022年9月12日发布了一份通函，截止日期为2022年10月14日，邀请食典委成员和观察员就食典委是否应开展新工作以制定关于在监管框架内使用远程审计和核查的原则和准则提出意见，并根据《确定程序手册重点的标准》对项目文件提出意见。
26. 收到 XX 名成员的意见，均支持新工作提案。已参考具体意见，修订后的工作提案载于 CX/CAC 22/45/13 号文件。
27. 提请执委会第八十三届会议根据《程序手册》的要求，审查是否批准 CX/CAC 22/45/13 号文件所载的新工作提案，并向食典委第四十五届会议提出建议。

Annex I
Original Language Only

COMMENTS IN REPLY TO CL 2021/91/OCS-EXEC - Request for comments on the proposal for revision of the *Standard for Kimchi* (CXS 223-2001)

COMMENTS	MEMBER
Egypt agrees on the document with no comments	Egypt
<p>Yes. The existing standard for Kimchi is old (Adopted in 2001 and Amended in 2017). We support further revision of the standard considering innovations and latest update in the field of Food Technology.</p> <p>We observed that the information provided in the project document is sufficient enough.</p> <p>We have products similar to Kimchi Cabbage and the sections are related.</p>	India
<p>Since the <i>Codex Standard for Kimchi</i> (CXS 223-2001) was last amended in 2017 and considering the possibility of developments/innovations related to the use of raw materials and/or fermentation technology which will have an impact on changes in the scope, definition, food additives and other matters contained in the standard, Indonesia is of the view that Codex should take initial means to further process the new work proposal to revise the standard in accordance with the rules stated in Codex Procedural Manual.</p> <p>Indonesia is of the view that the information contained in the proposed project document is clear and sufficient and already consistent with the criteria in the Codex Procedural Manual.</p> <p>Related to the section 3 the main aspects to be covered of the project document, Indonesia suggests that the proposed change of definition not only focus on modify the common and/or commodity name of the "Chinese cabbage" as the main ingredient of Kimchi, but also opening up possibilities of using other species/types of cabbage as the main ingredient, considering that currently kimchi is also produced in other regions which only have other species/type of cabbage.</p>	Indonesia
<p>Japan recognizes that the <i>Codex Standard for Kimchi</i> (CXS 223-2001) has been generally applied to the current trade practice in Kimchi since the standard was adopted in 2001, and Japan has not identified any gaps in the existing Standard and the current trade practices of Kimchi. For the moment, therefore, Japan doesn't believe Codex should initiate new work on revising the Standard for Kimchi.</p> <p>Regarding the main ingredient used in current <i>Standard for Kimchi</i>, Japan has not recognized that there are any confusion in trade and consumers' choice. We are concerned that change of the main ingredient nomenclature in the Standard may create confusion in countries that are trading Kimchi.</p> <p>Regarding the fermentation and preservation conditions, lactic acid fermentation is the major fermentation occurring during the kimchi preparation. When proposed draft standard for Kimchi was discussed at the 11th session of Coordinating Committee for CCASIA held in December 1997, the Committee noted it and decided that total acidity was expressed in lactic acid (para16, ALINORM 99/15). Considering very small amount of other organic acids other than lactic acid occurring during kimchi preparation, Japan believes there is no need to place other organic acids in parallel with lactic acid in the standard. Japan recognizes that food additives necessary for Kimchi are covered by the current standard.</p> <p>In Japan, the total acidity values as lactic acid are usually around 0.5 % m/m when products are delivered from manufacturers, and don't get higher than 0.8 % m/m even during the distribution, which are enough lower than the total acidity of 1.0 % m/m as lactic acid set out in the Standard. We are concerned about the impact in practice in the international trade as that excessive fermentation during the distribution would produce carbon dioxide and swell the airtight containers.</p>	Japan

The United States recommends the proposal for the revision of the *Standard for Kimchi* (CXS 223-2001, amended 2017) not be approved as new work at this time, while data collection can continue. The CCPFV was adjourned only in 2020 and the kimchi standard was amended in 2017. The CCEXEC and CCPFV also need to consider whether there is a sufficient quorum interest to justify reactivating CCPFV for this new work. One way in which this can be assessed is from the responses to the question asked in the Circular Letter: “whether other kimchi-producing and consuming countries have similar or additional food safety or quality concerns regarding the indicated sections or other sections of the standard and whether they are prepared to provide additional data.”

Unless there is a sufficient number of responses from members stating that they will provide additional data to address the food safety and quality reasons to start new work, there may not be enough quorum interest and information for reactivating CCPFV to undertake this new work on kimchi.

The United States notes that within the Project Document, Section 3 - The Main Aspects to be Covered, Subsection 4 -Set Out the Upper Limit of Acidity Value of Kimchi, the Republic of Korea requests member countries “to collect the related data from industries of each country and to set out a new standard for acidity for kimchi.” By stating this, the Republic of Korea acknowledges that additional time is needed for research/studies on acidity in kimchi before revising the standard. It is customary and advised that countries requesting revision of a Codex standard should have provided all the necessary information supporting the request. The request for data currently indicates that there is insufficient data to undertake the revision of the standard in a timely manner and therefore poses the challenge of a prolonged revision process.

USA

附件 II

《果汁和果蜜的通用标准》（CXS 247-2005）拟议修订

附件

20°C 条件复原果汁和复原果泥的最低白利糖度以及果蜜中的果汁和/或果泥最低含量 (% V/V)

植物学名称	水果通用名称	复原果汁和复原果泥的最低白利糖度	果蜜中的果汁和/或果泥最低含量(% v/v)
<i>Vitis vinifera</i> L.或其杂交种	葡萄	16.0	50.0
<i>Vitis labrusca</i> 或其杂交种		<u>14.0</u>	

附件 III

C. 《果汁和果蜜的通用标准》（CODEX STAN 247-2005）修订提案

1. 标准的范围和范围：

Vitis vinifera 与 *Vitis labrusca* 所生产的葡萄汁大为不同，含糖量是重要参数之一。实际生产场景中收集的数据表明，*V. labrusca* 果汁含糖量始终低于 CXS 247/2005 的最低白利糖度 16.0。也就是说，除因含糖量低在营养方面有积极影响外，*V. Labrusca* 葡萄汁的甜度和酸度也较为平衡，受到消费者喜爱。

拟议修订的目的是在《果汁和果蜜的通用标准》（CXS 247/2005）附件中添加对 *V. labrusca* 及其杂交种的具体限量，从而提高《标准》精确度，准确反映用 *V. labrusca* 及其杂交种生产的复原葡萄汁的最低白利糖度水平。

提案建议将上述品种葡萄汁的单一白利糖度分成两组：一组为 *V. vinifera* 及其杂交种，最低白利糖度仍为 16.0；。另一组为 *V. labrusca* 及其杂交种，最低白利糖度建议设为 14.0。

提案符合 CXS 247/2005 所述现行标签规定，尤其是第 8.1.1.1 和 8.1.2.4 节，以及第 9 节中列出的真实性方法。

此外，拟议修订旨在涵盖各成员国葡萄汁产业的不同情况，可提高《标准》的准确性和覆盖面，从而便于在葡萄汁贸易中推广使用和提高透明度。此外，修订的另一目的是推动国际贸易，促进各地区供应葡萄汁，符合可持续发展目标 2（粮食安全和更好营养）以及可持续发展目标 2（负责任消费和生产）。

2. 相关性和及时性：

由于葡萄酒和其他葡萄产品的经济价值，葡萄种植十分广泛。葡萄浆果富含类黄酮，保健功效得到研究。近年来，全球范围内无酒精葡萄产品领域的科学研究进一步加强。

2019 年，国际葡萄和葡萄酒组织在巴西代表团首先倡议下，在鲜食葡萄、葡萄干和未发酵葡萄产品分委会启动复原葡萄汁定义研究（临时决议草案 VITI-SCRAISIN 20-678B）。目前，经过工作组多轮讨论，并与国际葡萄和葡萄酒组织成员国探讨，项目尚未统一最低白利糖度，因巴西代表团指出 *V. labrusca* 及其杂交种葡萄的白利糖度应为 14.0，而非 16.0（CODEX STAN 247 2005 建议值）。由于该组织和成员国希望与国际标准统一，鲜食葡萄、葡萄干和未发酵葡萄产品分委会上届会议时，小组主席提议将决议文件推进至第 7 步；尽管如此，该文件能否在国际葡萄和葡萄酒组织进一步推进仍取决于食品法典复原葡萄汁最低白利糖度现行标准能否修订。

巴西表示愿意提请食品法典委员会执行委员会注意该情况，原因是：应当评价现行标准是否应进行审查，进而为成员国和葡萄汁行业提供更好的指导意见，且考虑到为两种葡萄品种设定单一最低白利糖度无法涵盖所有葡萄品种，影响 *V. labrusca* 及其杂交种，因此应该修订附件相应内容。

3. 主要内容：

食典委政府间水果及蔬菜汁规范特设工作组第四届会议（2004 年 10 月 11-15 日，巴西福塔雷萨）期间，工作组同意保留 16.0 的最低白利糖度，该建议在会上提出，并通过确定葡萄汁国际平均白利糖度的计算表格予以确认。

修订工作目的在于更新 247/2005 标准（果汁和果蜜）附件中复原葡萄汁和复原果泥的最低白利糖度，提议将单一值分为两组：第一组 *V. vinifera* 及其杂交种，最低白利糖度仍为 16.0；第二组 *Vitis. labrusca* 及其杂交种，最低白利糖度设为 14.0。

此外，考虑到尽可能提高标准包容性的建议，修订工作将使《标准》更加清晰，明确《标准》与其附件所列葡萄品种之间的关联性。

4. 对照《确定工作重点的标准》开展的评估：

国际葡萄和葡萄酒组织（2022 年）指出，2021 年全球葡萄园占地面积据估计为 730 万公顷。全球 91 个国家进行商业化葡萄生产（粮农组织统计数据库，2020 年）。葡萄在全球各地均有分布，可直接食用，也可用于生产无酒精和含酒精产品。粮农组织统计数据库数据（2020 年）显示，2020 年全球葡萄汁出口总量为 643,079 吨，出口额达 697,749,000 美元。因此，食典委葡萄汁标准修订提案符合《食品法典委员会程序手册》中《确定工作重点的标准》，尤其是以下标准：

- i. 各国的生产量和消费量，以及各国之间的贸易量和贸易格局；
- ii. 国际和区域市场潜力。

5. 与法典战略目标的相关性

拟议修订符合《2020-2025 年食典战略计划》目标 1 和目标 2 所列标准，即：

目标 1.2：食典委及时应对新出现问题以及成员需要。通过及时解决上述现有问题，食典委能够促进为进入国际贸易的食品建立健全的全球监管体系，从而有效并迅速作出调整和应对。

目标 2.2：推动提交和利用具有全球代表性的数据，制定和审议法典标准。标准及时更新并反映全球所有产品规格，能够促进食典委标准应用。食品法典委员会通过拟议更新等有效应对措施能够协调全球性工作，提供包容性文件。

6. 关于提案与其他现有食典文件以及其他正在开展的工作之间关系的信息：

本提案与食典《果汁和果蜜的通用标准》（CXS 247-2005）相关。

7. 明确关于提供专家科学建议的要求：

由于预期变动十分及时且旨在提高一致性，因此无需提供科学建议。

8. 确定是否需要外部机构对标准提供技术意见：

无。

9. 拟议工作完成进度：

根据《程序手册》第二章中“食品法典标准和相关文本的制定程序”，食典委预计将在考虑执行委员会开展的严格审查之后接受修订决定。建议向成员国发出通函，要求就附件 1 拟议修订是否可通过提出反馈意见。

Annex IV
Original Language Only

**REPLIES TO CL 2022/58/OCS-EXEC - Request for comments on the Proposal for revision of
the *Standard for Milkfat Products* (CXS 280-1973)**

COMMENT	MEMBER/OBSERVER
<p>At this time, Canada does not believe there is justification to support the proposal for new work. We believe the project document could benefit from further detail on the assessment against the criteria for the establishment of work priorities.</p>	Canada
<p>Colombia apoya la modificación que propone la República Islámica de Irán (ver justificación en la carta circular), y es ajustar los NM de Fe y Cu de acuerdo con la CXS 210-1999. Los NM de cobre y hierro de los aceites comestibles refinados de origen vegetal que son de 0,1 mg/kg y 1,5 mg/kg, respectivamente</p>	Colombia
<p>Cuba agradece la oportunidad de expresar sus comentarios a la CL 2022/58/OCS-CCEXEC y en principio apoya la propuesta de nuevo trabajo de revisión de la norma para los productosa base de grasade leche(CXS-280-1973 en los aspectos que se plantean en el documento de proyecto.</p>	Cuba
<p>Egypt does Not support the Two introduced proposals (revising the limits for copper and iron in CXS 280-1973 to align with those in CXS 210-1999; or to deleting copper and iron content from the “Other contaminants” listed in the Appendix-additional information to CXS 280-1973 for ghee and butter oil as in other milk products), and support maintaining the maximum amount of copper (Cu) and iron (Fe) in those products at 0.05 and 0.2 mg/kg, respectively that mentioned in CXS 280 -1973, (Standard for Milkfat Products)</p> <p>We see that the key issue with aligning with those limits mentioned in CXS 210-1999 is that Iron and Copper catalyse the oxidation process leading to faster deterioration of the Milk Fat products. Also, as part of the refining process; antioxidants are added to the Vegetable oils, and thus they have some ability to withstand their impact. While some Milk Fat Products doesn't have antioxidants added, and then depending only on their natural antioxidants.</p> <p>Up on CXS 280 -1973 the Maximum peroxide value (milli-equivalents of oxygen/kg fat) is 0.3 for Anhydrous milkfat / Anhydrous butter oil, so Depending upon whether this needs to be met at time of manufacture or time of use, removal of copper/iron limits will impact the ability of those products to meet this limit at time of use and then shorten shelf life.</p> <p>Finally, We support to maintain the dairy limit mentioned in CXS 280 -1973 and not compare with the limits mentioned in CXS 210-1999 for vegetable oil OR delete those limits</p>	Egypt
<p>The EUMS support the proposal for new work to revise the maximum levels for iron and copper in <i>Standard for Milkfat Products</i> (CXS 280-1973). To facilitate the work, Iran is invited to share the data, which would justify the need to change or delete the maximum levels for copper and for iron in ghee (CXS 280-1973).</p>	European Union
<p>Kenya suggests that the committee consider seeking scientific advice from the relevant FAO/WHO scientific body.</p> <p>Justification Codex Standards are developed based on sound science and therefore the contribution of a scientific body would be necessary to ensure safe levels are considered. Different food components interact differently</p>	Kenya

<p>within different types of foods and therefore a specific assessment should be done for a specific food product/ food category.</p>	
<p>New Zealand does not support either proposal (option 1 or option 2) to change the values for copper and iron as set out in the proposed standard. We consider the standard should be retained as it is.</p> <p>We suggest there has been a misunderstanding in the interpretation of the Standard for milk fat products. The Standard for milk fat products does not set maximum limits for copper and iron for safety reasons (as are set out in the other standards they are being compared with). Given they are not maximum limits they should not be treated as such. While values for copper and iron are included, the Standard explicitly notes that these are not mandatory limits. Instead they are voluntary, and are only included for quality purposes (not compliance).</p> <p>The rationale for the proposed Standard therefore does not apply. Making the proposed changes would in fact be disharmonious and not facilitate fair practice in food trade.</p>	<p>New Zealand</p>
<p>The United States does not support this proposal to revise the <i>Standard for milkfat products</i> (CX 280-1973). We do not support the proposed options to either align the maximum limits for heavy metals with those of other edible fats and oils in Codex standards or to remove the limits of copper and iron residues in milkfat in CXS 280-1973.</p> <p>Copper and iron are essential micronutrients for dairy cows. Their content in milk fluctuates depending on the diet of the cows; however, there are quality reasons for maintaining limits of these micronutrients. Excessive amounts of copper and iron will negatively impact the oxidative stability of milkfat and may contribute to off-flavour and other defects in milkfat products. The establishment of the limits of copper and iron in milkfat requires a fine balance between dietary needs and the oxidative stability of milkfat. The necessary level of copper and iron in different commodities are not comparable. It is not appropriate to align their contents in the respective fat product.</p> <p>The United States does not support the removal of the limits in milkfat to prevent excessive amounts of copper and iron which could damage milkfat quality. Although these limits are not mandatory, they serve as a reference for quality control. (CXS 192-1995 <i>General Standard for Food Additives</i>).</p> <p>Also, according to Codex standard (CXS 280-1973), these limits on copper and iron are not mandatory as noted in the explanatory text in the appendix. Exceeding these limits will not be considered as non-compliance per se.</p>	<p>USA</p>
<p>IDF does not support either Option 1 or Option 2 proposed by Iran as we believe that there is no need to align the limits nor to remove them. Our preference would be to not proceed with any changes to the <i>Standard for Milkfat Products</i> (CXS 280-1973).</p> <p>The limits on copper and iron are for guidance and quality purposes only, rather than mandatory contaminant limits. There are also valid technical reasons for maintaining the limits for copper and iron in the Standard as they currently stand.</p> <p>We note a possible concern that these limits could be misunderstood to be mandatory contaminant limits. However, we believe the Standard already explains that this is not the case.</p> <p>The nature of the limits in question We recognise that the <i>Standard for Milkfat Products</i> (CXS 280-1973) has a section in Appendix – Additional Information with the heading “2. Other Contaminants” and that this section sets out limits for copper and</p>	<p>IDF/FIL</p>

<p>iron in Anhydrous Milkfat, Milkfat, Anhydrous Butter Oil, Butter Oil, and Ghee.</p> <p>We would like to call attention to the explanatory text for the Appendix: The additional information below does not affect the provisions in the preceding sections which are those that are essential to the product identity, the use of the name of the food and the safety of the food. This text explains that these limits are not mandatory limits. Therefore, there is no issue of non-compliance if these limits are not met. We note that the new work proposal refers to non-compliance and wonder whether there is some misunderstanding of the nature of these limits. These limits are quality factors that provide guidance for the quality of milkfat products and are helpful to retain in the Standard.</p> <p>Food quality reasons for maintaining the limits and explanation of misalignment between commodity standards</p> <p>Flavour is a key valuable attribute of milkfat products. Oxidation of milkfat results in a deterioration of this flavour. Iron and copper are well-known to catalyse the oxidation of milkfat (Kehagias & Radema, 1973) and increasing the maximum allowable level of copper and iron in milk fat products will lead to an increase in oxidation, and a deterioration in milk fat quality.</p> <p>For anhydrous milkfat in particular, it is important to control the copper and iron levels as antioxidants are not permitted to be added into anhydrous milkfat (CXS 192-1995 <i>General Standard for Food Additives</i>). Therefore, it is more important in anhydrous milkfat to have lower copper and iron levels than in products conforming to other commodity standards.</p> <p>Analytical methods</p> <p>Test results on copper and iron in butter and butterfat obtained through applying an ICP-MS method were all below the maximum limits of 0,2 mg/kg for iron and 0,05 mg/kg for copper. Therefore, IDF deems the current MLs in CXS 280-1973 feasible.</p>	
--	--