

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 5

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

First Session

Beijing, China, 16 - 20 April 2007

PROPOSED DRAFT REVISION OF THE PREAMBLE OF THE GENERAL STANDARD FOR CONTAMINANTS AND TOXINS IN FOOD (GSCTF) (N04-2006)

Comments at step 3 submitted by Japan

JAPAN

First of all, we wish to thank the European Community for being the lead in preparing the document. We would like to provide some additional comments in order to contribute in the revision and inclusion of some parts of the Preamble in the Procedural Manual.

1. We confirm our agreement with the principles of the revision shown in paras. 6(a), 6(b) and 6(c). Those texts and provisions only relevant for the CAC and its subsidiary bodies should be transferred to the Procedural Manual. Only those parts that constitute recommendations to Codex Members should remain in the Preamble.

2. We strongly support the addition of an Annex to the "Risk Analysis Principles Applied by the Codex Committee on Food Additives and Contaminants" as in Appendix II of the document. The current Preamble of the GSCTF includes procedures and criteria for establishing standards for contaminants and toxins used by CCCF. They can be categorized as risk management policies which CCCF refers to for consistent and transparent decision making on risk management measures (e.g., Maximum level). We believe it very useful for Codex members to compile all the risk management policies so far agreed to and used by CCCF and to attach them as an annex to the Risk Analysis Principles Applied by the Codex Committee on Food Additives and Contaminants in the Procedural Manual.

3. We think the section, "1.4 Codex Procedure for Establishing Standards for Contaminants and Toxins in Foods" should be deleted from the Preamble because all the texts in Section 1.4 are relevant only to CCCF and therefore should not remain in the Preamble. If this section is deleted, then the following sections, i.e., sections 1.5 and 1.6, should be re-numbered accordingly.

4. Taking into consideration on-going elaboration of the risk analysis working principles for Codex members by CCGP, the term "in accordance with" in the following occurrences should be replaced with "taking into consideration".

- In the second line of the first paragraph and the third line of the second paragraph in section 1.3.2 in page 6 of the draft text; and

- In the first line of the first paragraph in page 11 of the draft text.