

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 5

CAC/40 CRD/3

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

40th Session

CICG, Geneva, Switzerland

17 - 22 July 2017

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

Comments of Ecuador, Qatar, Iran, Nicaragua, Nigeria, El Salvador, Tanzania, India and African Union

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

Proposed draft MRLs for lasalocid sodium, ivermectin and teflubenzuron
(REP 17/RVDF Paras 60, 62, 66 Appendix IV)

Comments of El Salvador, Nigeria, Tanzania and African Union

EL SALVADOR

El Salvador apoya la adopción final en el trámite 5/8 para los siguientes documentos:

- Límites máximos de residuos (LMR) para el lasalocid sódico (riñón, hígado, músculo y piel + grasa de pollo/gallina, pavo, codorniz y faisán) (78.^a reunión del Comité Mixto FAO/OMS de Expertos en Aditivos Alimentarios [JECFA]), la ivermectina (grasa, riñón, hígado y músculo de bovino) (81.^a reunión del JECFA) y el teflubenzurón (filete y músculo de salmón) (81.^a reunión del JECFA). REP17/RVDF Párrs. 60, 62 y 66, Apéndice IV.

NIGERIA

General Comment on CCRVDF MRLs for ivermectin (cattle fat, kidney, liver, muscle) (81st JECFA); teflubenzuron (salmon fillet, muscle) (81st JECFA):

Nigeria took note of the information provided on the proposed draft MRLs for Ivermectin and Teflubenzuron supports the advancement proposed MRLs of these veterinary drugs to the next step.

Rationale

New risk assessment and recommendations by JECFA on these drugs with respect to the cattle fat, kidney liver and muscle indicated no adverse effects in humans at the MRLs

Tanzania

Position: Tanzania supports the adoption of the MRLs of lasalocid, ivermectin and teflubenzuron at step 5/8.

Rationale: Risk assessment by JECFA did not indicate intake concerns from dietary exposure to the three veterinary drugs.

AFRICAN UNION

BACKGROUND

- 81st JECFA reaffirmed the proposed MRL recommended by the 78th JECFA for lasalocid sodium in Chicken, turkey, quail and pheasant kidney, muscle, skin + fat)
- The 81st JECFA recommended MRL for ivermectin in cattle fat, kidney, liver muscle
- The 81st JECFA recommended MRL for teflubenzuron in salmon fillet, muscle

POSITION: **African union** supports the adoption of the MRLs of lasalocid, ivermectin and teflubenzuron at step 5/8.

RATIONALE: Risk assessment by JECFA did not indicate intake concerns from dietary exposure to the three veterinary drugs.

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

Revision of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003)
(REP 17/FH Para 36 Appendix III)

Comments of El Salvador, Nicaragua, Nigeria, Tanzania and African Union

EL SALVADOR

El Salvador apoya la adopción final en el trámite 5/8 para los siguientes documentos:

- Revisión del Código de Prácticas de Higiene para las Frutas y Hortalizas Frescas (CAC/RCP 53-2003) (anteproyecto). REP17/FH Párr. 36, Apéndice III.

NICARAGUA

Nicaragua apoya la aprobación definitiva de los siguientes textos del Codex:

-Revisión del Código de prácticas de higiene para las frutas y hortalizas frescas (CAC/RCP 53-2003) (anteproyecto)

NIGERIA

Nigeria supports the adoption of the proposed draft revision of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) at step5/8.

Rationale

All outstanding issues have been addressed. The Code also addresses Good Agricultural Practices (GAPs) and Good Hygienic Practices (GHPs) for controlling microbial, chemical and physical hazards associated with all stages of the production of fresh fruits and vegetables, from primary production to consumption.

Tanzania

Background: The CCFH noted that all outstanding issues including amendment to paragraph 36: "Agricultural workers applying agricultural chemicals should receive training on appropriate application and safety procedures " were finalized.

Position: Tanzania supports the adoption of the Code of Practice at Step 5/8.

Rationale: The Code addresses Good Agricultural Practices (GAPs) and Good Hygienic Practices (GHPs) for controlling microbial, chemical and physical hazards associated with all stages of the production of fresh fruits and vegetables, from primary production to consumption.

AFRICAN UNION

BACKGROUND: CCFH (2016) addressed all outstanding issues related to the Code of Practice (CoP) The Committee therefore agreed to recommend the adoption of the CoP at Step 8.

POSITION: African Union supports the adoption of the Code of Practice at Step 5/8

RATIONALE: The Code addresses Good Agricultural Practices (GAPs) and Good Hygienic Practices (GHPs) for controlling microbial, chemical and physical hazards associated with all stages of the production of fresh fruits and vegetables, from primary production to consumption.

- **Coordinating Committee for Latin America and Caribbean**
Comité FAO/OMS de coordination pour l'Amérique Latine et les Caraïbes
Comité Coordinador FAO/OMS para América Latina y el Caribe

Proposed draft Regional Standard for Yacon (REP 17/LAC Para 123 Appendix III)

Comments of Nicaragua

NICARAGUA

Nicaragua apoya la aprobación definitiva de los siguientes textos del Codex:

Norma Regional para el Yacón

- **Committee on Nutrition and Food for Special Dietary Uses**
Comité sur la nutrition et les aliments diététiques ou de régime
Comité sobre Nutrición y Alimentos para Regímenes Especiales

NRV—R for vitamins D and E and the conversion factors for vitamin E equivalents
 (REP 17/NFSDU Para 26, 28 and 36 Appendix III)

Comments of El Salvador, Nigeria, Tanzania and African Union,

EL SALVADOR

El Salvador apoya la adopción final en el trámite 5/8 para los siguientes documentos:

Valores de referencia de nutrientes necesidades (VRN-N) para vitaminas D y E y factores de conversión de los equivalentes de la vitamina E a efectos del etiquetado en las Directrices sobre el etiquetado nutricional (CAC/GL 2-1985). REP17/NFSDU Párrs. 26, 28 y 36, Apéndice III.

NIGERIA

Nigeria supports the adoption of NRV-R for vitamins D and E and the conversion factors for vitamin E equivalents for labelling purposes in the Guidelines on Nutrition Labelling (CAC/GL 2-1985) at step 5/8 and 8.

Rationale

The recent values prescribed reflect current state of the knowledge/facts.

TANZANIA

CAC39 adopted the NRV for vitamin E at step 5 noting the need to agree on conversion factors before finalization of NRVs. CCNFSDU30 adopted NRV for vitamin E of 9 mg per day and proposed a conversion factor of 1mg of α -tocopherol as a vitamin-equivalent (vitamin) for vitamin E.

CCNFSDU38 adopted NRV-R for Vitamin D of 5-15 μ g/day with a footnote ("based on minimal sunlight exposure throughout the year") that leaves it to the competent national authorities to determine the appropriate NRV-R based on exposure to the sun.

Position and Rationale: Tanzania supports the adoption of NRV-R for Vitamin D and E as these values reflect current state of the knowledge.

AFRICAN UNION

BACKGROUND

CAC39 adopted the NRV for vitamin E at step 5 noting the need to agree on conversion factors before finalization of NRVs. CCNFSDU30 adopted NRV for vitamin E of 9 mg per day and proposed a conversion factor of 1mg of α -tocopherol as a vitamin-equivalent (vitamin) for vitamin E.

CCNFSDU38 adopted NRV-R for Vitamin D of 5-15 μ g/day with a footnote ("based on minimal sunlight exposure throughout the year") that leaves it to the competent national authorities to determine the appropriate NRV-R based on exposure to the sun.

POSITION AND RATIONALE: African Union supports the adoption of NRV-R for Vitamin D and E as these values are important for nutritional labelling.

Coordinating Committee for Africa
Comité FAO/OMS de coordination pour l'Afrique
Comité Coordinador FAO/OMS para África

Proposed draft Regional Standard for Unrefined Shea Butter,
(REP 17/AFRICA Para 78, Appendix III)

Comments of Nigeria, Tanzania and African Union

NIGERIA

Nigeria supports the adoption of the proposed draft Regional Standard for Unrefined Shea Butter at step 5/8.

Rationale

The standard will facilitate intra-regional trade of Shea Butter in Africa. The product is widely traded in Africa. Regional standards for Shea Butter will therefore facilitate and boost intra-regional trade.

TANZANIA

Position: Tanzania supports the adoption at Step 5/8 of the three standards

Rationale: The products are widely traded in Africa. Regional standards for these commodities will therefore facilitate and boost intra-regional trade.

AFRICAN UNION

BACKGROUND: The 22nd Session of CCAFRICA recommended the following standards for adoption by CAC40:

Regional Standard for Unrefined Shea Butter (Proposed Draft) (REP17/AFRICA, Para. 78, Appendix III) at Step 5/8

POSITION: African Union supports the adoption at Step 5 of the standard for unrefined shea butter.

RATIONALE: The product is widely traded in Africa. Regional standards for these commodities will facilitate and boost intra-regional trade.

Committee on Spices and Culinary Herbs
Comité sur les épices et les herbes culinaires
Comité sobre Especies y Hierbas Culinarias

Draft Standard for Cumin (REP 17/SCH Para 29 Appendix II)

Comments of Nigeria, Tanzania and African Union

NIGERIA

Nigeria supports the adoption of the standard for cumin at Step 8.

TANZANIA

Tanzania supports adoption of the standard for Cumin at Step 8.

This Standard applies to cumin offered for direct consumption, as an ingredient in food processing, or for repackaging if required. It excludes cumin intended for industrial processing.

AFRICAN UNION

BACKGROUND: This Standard applies to cumin offered for direct consumption, as an ingredient in food processing, or for repackaging if required. It excludes cumin intended for industrial processing.

POSITION: African Union does not object to the adoption of the standard for cumin at Step 8.

Draft Standard for Thyme (REP 17/SCH Para 38 Appendix III)

Comments of Nigeria, Tanzania and African Union

NIGERIA

Nigeria supports the adoption of the standard for thyme at Step 8.

TANZANIA

Tanzania supports adoption of the standard for Thyme at Step 8.

This Standard applies to dried thyme offered for direct consumption, as an ingredient in food processing or for repackaging if required. It excludes dried thyme intended for industrial processing.

AFRICAN UNION

BACKGROUND: This Standard applies to dried thyme offered for direct consumption, as an ingredient in food processing or for repackaging if required. It excludes dried thyme intended for industrial processing. It excludes cumin intended for industrial processing.

POSITION: African Union does not object to the adoption of the standard for thyme at Step 8.

Proposed draft Standard for Black, White and Green Pepper
(REP 17/SCH Para 42 Appendix IV)

Comments of Nigeria, Tanzania and African Union

NIGERIA

Nigeria supports the adoption of the standard for black, white and green pepper at Step 5/8.

TANZANIA

Tanzania supports adoption of the standards for black, white and green pepper at Step 5/8.

This standard applies to Black, White and Green peppers (abbreviated as BWG) offered for direct consumption, as an ingredient in food processing or for repackaging if required. It excludes BWG peppers intended for industrial processing.

AFRICAN UNION

BACKGROUND: This standard applies to Black, White and Green peppers (abbreviated as BWG) offered for direct consumption, as an ingredient in food processing or for repackaging if required. It excludes BWG peppers intended for industrial processing.

POSITION: African Union does not object to the adoption of the standard for black, white and green pepper at Step 5/8.

**Committee on Fats and Oils
Comité sur les graisses et les huiles
Comité sobre Grasas y Aceites**

Proposed draft Revision to the Standard for Olive Oils and Olive Pomace Oils (CODEX STAN 33-1981):
Revision of the limit for Campesterol (REP 17/FO Para 34 Appendix IV)

Comments of Nigeria

NIGERIA

Nigeria supports the adoption of Revision to the Standard for Olive Oils and Olive Pomace Oils (CODEX STAN 33- 1981) at step 5/8.

Amendment to the *Standard for Named Vegetable Oils* (CODEX STAN 210-1999), (Sections 2, 4.1)(Para 13 (iii), Appendix II, Part B; Para 48, Appendix VI; Para 82, Appendix IX)

Comments of Nigeria

NIGERIA

Nigeria also support the adoption of Revision to the Standard for Named Vegetable Oils (CODEX STAN 2101999) at step 5/8.

**Committee on Food Additives
Comité sur les additifs alimentaires
Comité sobre Aditivos Alimentarios**

Proposed draft Specifications for the Identity and Purity of Food Additives: Amendment to *List of Codex Specifications for Food Additives* (CAC/MISC 6) (REP 17/FA Para 41, Appendix III, Part A)

Comments of El Salvador, Tanzania and African Union

EL SALVADOR

El Salvador apoya la adopción final en el trámite 5/8 para los siguientes documentos:

Especificaciones de identidad y pureza de aditivos alimentarios (anteproyecto) enmiendas a la Lista de especificaciones del Codex para aditivos alimentarios (CAC/MISC 6) REP17/FA Párr. 41, Apéndice III, Parte A.

TANZANIA

Position: Tanzania supports the adoption at CAC40.

Rationale: JECFA as the risk assessment body for the CAC on food additives, contaminants and residues of veterinary drugs in food conducted evaluations on the additives and advised that they were of adequate food grade quality.

AFRICAN UNION

BACKGROUND: The CCFA is submitting proposed draft specifications for identity and purity of food additives arising from the 82nd JECFA meeting to CAC40 for adoption at Step 5/8.

POSITION: African Union supports adoption of the specifications in REP17/FA PARA. 41, APPENDIX III.

RATIONALE: JECFA as the risk assessment body for the CAC on food additives, contaminants and residues of veterinary drugs in food conducted evaluations on the additives and advised that they were of adequate food grade quality.

Draft and proposed draft food additive provisions of the *General Standard for Food Additives* (GSFA): (CODEX STAN 192-1995)(REP17/FA Paras 72 and 108 (i), Appendix VI, Part A)

Comments of Tanzania and African Union

TANZANIA

Position: Tanzania supports the adoption of the draft and proposed draft food additives provisions.

Rationale: JECFA as the risk assessment body for the CAC on food additives, contaminants and residues of veterinary drugs in food conducted an assessment and advised that the food additives did not present dietary intake concerns.

AFRICAN UNION

BACKGROUND: JECFA assigned acceptable daily intake and international numbering systems to various food additives for inclusion in the General Standard for Food Additives (GSFA). The additive provisions are

being proposed for adoption at Step 8 and Step 5/8 by CAC40 for their subsequent inclusion in the GSFA. The GSFA is recognized as the single most authoritative reference for all food additives.

POSITION: African Union supports the adoption of the draft and proposed draft food additives provisions.

RATIONALE: JECFA as the risk assessment body for the CAC on food additives, contaminants and residues of veterinary drugs in food conducted an assessment and advised that the food additives did not present dietary intake concerns.

Proposed draft revision of the *Class Names and the International Numbering System for Food Additives* (CAC/GL 36-1989) (REP 17/FA Para 117(i), Appendix X)

Comments of El Salvador, Tanzania and African Union

EL SALVADOR

El Salvador apoya la adopción final en el trámite 5/8 para los siguientes documentos:

Revisión del documento Nombres genéricos y sistema internacional de numeración de aditivos alimentarios (CAC/GL 36-1989) (anteproyecto). REP17/FA Párr. 117 i), Apéndice X.

TANZANIA

Background: The CCFA agreed to forward the proposed draft amendments to the INS to CAC40 for adoption at Step 5/8 (Appendix X). The INS provides a unified and simple coding system for identifying food additives that may be food in the list of ingredients. .

Position: Tanzania supports the adoption at step 5/8 of amendments to INS by CAC 40.

Rationale: To ensure harmonization of class names and INS for food additives.

AFRICAN UNION

BACKGROUND: The CCFA (2017) agreed to forward the proposed draft amendments to the INS to CAC40 for adoption at Step 5/8 (Appendix X). The INS provides a unified and simple coding system for identifying food additives that may be food in the list of ingredients. .

POSITION: African Union supports the adoption at step 5/8 of the amendments to INS.

RATIONALE: To ensure harmonization of class names and INS for food additives.

Revised food additives sections of several Codex commodity standards
(REP 17/FA Para 55(i),point a, b, Appendix V)

Comments of Nicaragua, Tanzania and African Union

NICARAGUA

Nicaragua apoya la aprobación definitiva de los siguientes textos del Codex:

Revisión de las disposiciones relativas a aditivos alimentarios de la NGAA en relación a las disposiciones sobre el etilendiaminotetracetato de la Norma para los camarones en conserva (CODEX STAN 37-1981).

Revisión de las secciones sobre aditivos alimentarios de la Norma para los tomates en conserva (CODEX STAN 13-1981), la Norma para los concentrados de tomate elaborados (CODEX STAN 57-1981), la Norma para pescados no eviscerados y eviscerados congelados rápidamente (CODEX STAN36-1981), la Norma para los camarones congelados rápidamente (CODEX STAN 92-1981), la Norma para langostas congeladas rápidamente (CODEX STAN 95-1981), la Norma para bloques de filetes de pescado congelados rápidamente (CODEX STAN 165-1989), la Norma para los filetes de pescado congelados rápidamente (CODEX STAN 190-1995), la Norma para barritas, porciones y filetes de pescado empanados o rebozados congelados rápidamente (CODEX STAN 166-1989) y la Norma para productos de pectínidos frescos y pectínidos crudos congelados rápidamente (CODEX STAN315- 2014).

TANZANIA

Background: The CCFA revised the food additives provisions in food category 9.2.1 and 9.2.1. to align the additives provisions in these commodity standards with the GSFA.

Position: Tanzania supports adoption of the revisions by CAC 40.

Rationale: Alignment is necessary for making GSFA the single reference point for all food additives.

AFRICAN UNION

BACKGROUND: The CCFA (2017) revised the food additives provisions in food category 9.2.1 and 9.2.1. to align the additives provisions in these commodity standards with the GSFA.

POSITION: African Union supports the adoption of the revised food additives provisions.

RATIONALE: Alignment is necessary for making GSFA the single reference point for all food additives.

**Committee on Contaminants in Foods
Comité sur les contaminants dans les aliments
Comité sobre Contaminantes de los Alimentos**

Amendment to the MLs for lead and arsenic in edible fats and oils(fish oils)(CODEX STAN 193-1995) (REP17/FC Para 16 and 18, Appendix II)

Comments of Nicaragua

NICARAGUA

Enmienda a los niveles máximos (NM) para el plomo y el arsénico en grasas y aceites comestibles (aceites de pescado) (CODEX STAN 193-1995).

Proposed draft & draft maximum levels for lead in certain processed fruits and vegetables (REP17/FC Para 88 and 89, Appendix II)

Comments of Nicaragua, Nigeria, Tanzania and African Union

NICARAGUA

NM para el plomo en algunas normas del Codex para frutas y hortalizas elaboradas (legumbres; confituras, jaleas y mermeladas; tomates en conserva; castañas en conserva y puré de castañas en conserva)(CODEX STAN 193-1995)

NIGERIA

Adoption of proposed draft MLs for lead

In respect of recommendation for the adoption of proposed draft MLs for lead in selected processed fruits and vegetables (pulses, jams, jellies and marmalades, preserved tomatoes, canned chestnuts and canned chestnuts puree) at step 8, Nigeria express its reservation on the lowering of maximum levels for lead in the selected fruits and vegetables and other food categories without lead occurrence data from Africa.

Rationale

Nigeria noted that the MLs were not geographically representative, even though not objecting to the adoption of the MLs but do request for revision of the MLs when occurrence data from Africa becomes available.

TANZANIA

BACKGROUND: Based on new toxicological evaluation of lead in food conducted by the Joint Expert Committee on Food Additives (JECFA) at its 73rd meeting, the CCCF decided to review the ML for lead in various food products. Following the evaluation, JECFA withdrew provisional tolerable weekly intake (PTWI) of 25 µg/kg bw for lead, indicating that it was not possible to establish a new PTWI that would be considered to be health protective.

Position and Rationale: We wish to express our reservation on the lowering of maximum levels for lead in the selected fruits and vegetables and other food categories without lead occurrence data from Africa. We

consider the MLs as not geographically representative. We will however, not object to the adoption of the MLs but request for revision of the MLs when occurrence data from Africa becomes available.

AFRICAN UNION

BACKGROUND: Based on new toxicological evaluation of lead in food conducted by the Joint Expert Committee on Food Additives (JECFA) at its 73rd meeting, the CCCF decided to review the ML for lead in various food products. Following the evaluation, JECFA withdrew provisional tolerable weekly intake (PTWI) of 25 µg/kg bw for lead, indicating that it was not possible to establish a new PTWI that would be considered to be health protective.

POSITION AND RATIONALE: African Union wishes to express reservation on the lowering of maximum levels for lead in the selected fruits and vegetables and other food categories without lead occurrence data from Africa hence African Union considers the MLs as not geographically representative. African Union will however, not object to the adoption of the MLs but request for revision of the MLs when occurrence data from Africa becomes available.

Annex on prevention and reduction of contamination by ergot and ergot alkaloids in cereal grains (Annex 6) to the Code of Practice for the prevention and reduction of mycotoxin contamination in cereals (CAC/RCP 51-2003) (REP 17/CF Para 111, Appendix V)

Comments of Nigeria, Tanzania and African Union

NIGERIA

Adoption of the draft annex on ergot and ergot alkaloids

Nigeria support the adoption at Step 5/8 of the draft annex on ergot and ergot alkaloids in cereal grains and recommend.

Rationale

Its adoption will serve as means of reducing ergots and ergot alkaloids in small grains. Most importantly, due to the CCCF's decision to develop a new annex on ergot and ergot alkaloids for inclusion in the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals. It is important to note that crops that are most susceptible to ergot sclerotia are rye, triticale, sorghum and pearl millet although there may be emerging issues also in wheat. The development of Annex on ergot and ergot alkaloids in cereal grains is justified on the basis of advancing Good Agricultural Practices including methods to reduce *Claviceps* (mainly *C. purpurea*) infection and ergot alkaloid (related to ergotism) contamination of cereals during crop growth and development, harvest, storage, transport and processing.

TANZANIA

BACKGROUND: The CCCF recognized that the Code of Practice for the Prevention and Reduction of mycotoxin contamination in cereals did not fully address control measures for the prevention and reduction of ergot and ergot alkaloids in cereal grain. Hence this annex is being developed to provide specific control measures applicable to ergot and ergot alkaloids. The Annex sets out recommended practices and GAPs for reducing *Claviceps* (mainly *C. purpurea*) infection and ergot alkaloid (related to ergotism) contamination of cereals during crop growth and development, harvest, storage, transport and processing.

Position: Tanzania supports the adoption at Step 5/8 of the draft annex in order to reduce ergots and ergot alkaloids in small grains and therefore be protective of public health.

Rationale: Tanzania supported the CCCF's decision to develop a new annex on ergot and ergot alkaloids for inclusion in the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals. The crops most susceptible to ergot sclerotia are rye, triticale, sorghum and pearl millet although there may be emerging issues also in wheat. The development of Annex on ergot and ergot alkaloids in cereal grains is justified on the basis of advancing Good Agricultural Practices including methods to reduce *Claviceps* (mainly *C. purpurea*) infection and ergot alkaloid (related to ergotism) contamination of cereals during crop growth and development, harvest, storage, transport and processing.

AFRICAN UNION

BACKGROUND: The CCCF recognized that the Code of Practice for the Prevention and Reduction of mycotoxin contamination in cereals did not fully address control measures for the prevention and reduction of ergot and ergot alkaloids in cereal grain. Hence this annex is being developed to provide specific control measures applicable to ergot and ergot alkaloids. The Annex sets out recommended practices and GAPs for reducing *Claviceps* (mainly *C. purpurea*) infection and ergot alkaloid (related to ergotism) contamination of cereals during crop growth and development, harvest, storage, transport and processing.

POSITION: African Union supports the adoption at Step 5/8 of the draft annex and recommend its adoption as it will reduce ergots and ergot alkaloids in small grains and therefore be protective of public health.

RATIONALE: African Union supported the CCCF's decision to develop a new annex on ergot and ergot alkaloids for inclusion in the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals. The crops most susceptible to ergot sclerotia are rye, triticale, sorghum and pearl millet although there may be emerging issues also in wheat. The development of Annex on ergot and ergot alkaloids in cereal grains is justified on the basis of advancing Good Agricultural Practices including methods to reduce *Claviceps* (mainly *C. purpurea*) infection and ergot alkaloid (related to ergotism) contamination of cereals during crop growth and development, harvest, storage, transport and processing

Proposed draft Code of Practice for the prevention and reduction of mycotoxins in spices
(REP 17/CF Para 115, Appendix VI)

Comments of Nigeria, Tanzania and African Union

NIGERIA

COP for the prevention and reduction of mycotoxin contamination in spices

Nigeria support the adoption at Step 5/8 of the Code of practice for the prevention and reduction of mycotoxin contamination in spices.

RATIONALE: The proposed draft COP covers GAP, GMP and GSP, and have addressed the comments and recommendations of CCCF10 by including packaging technologies and smoke drying practices (which is a common African practice). The standard will provide guidance towards management of food safety risks associated with mycotoxin contamination in spices. Hence, protect consumer health and enhance international trade.

TANZANIA

BACKGROUND: This Code of Practice establishes specific Good Agricultural Practices (GAPs), Good Manufacturing Practices (GMPs) and Good Storage Practices (GSPs) required for the prevention and reduction of mycotoxins in spices in order to attain as low as reasonably achievable level of these toxins.

Position: Tanzania supports the adoption at Step 5/8 of the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Spices.

Rationale: The proposed draft COP covers GAP, GMP and GSP, and have addressed the comments and recommendations of CCCF10 by including packaging technologies and smoke drying practices (which is a common African practice). The standard will provide guidance towards management of food safety risks associated with mycotoxin contamination in spices. Hence, protect consumer health and enhance international trade.

AFRICAN UNION

BACKGROUND: This Code of Practice establishes specific Good Agricultural Practices (GAPs), Good Manufacturing Practices (GMPs) and Good Storage Practices (GSPs) required for the prevention and reduction of mycotoxins in spices in order to attain as low as reasonably achievable level of these toxins.

POSITION: African Union supports adoption at Step 5/8 of the Code of practice for the prevention and reduction of mycotoxin contamination in spices.

RATIONALE: The proposed draft COP covers GAP, GMP and GSP, and have addressed the comments and recommendations of CCCF10 by including packaging technologies and smoke drying practices (which is a common African practice). The standard will provide guidance towards management of food safety risks associated with mycotoxin contamination in spices hence, protect consumer health and enhance international trade.

Committee on Pesticide Residues
Comité sur les Résidus de Pesticides
Comité sobre Residuos de Plaguicidas

MRLs for different combinations of pesticide/commodity(ies) proposed for adoption
 (REP 17/PR Para 110 Appendix II and III)

Comments of Tanzania and African Union

TANZANIA

Background: According to the Codex Procedural Manual, the JMPR evaluates residue and toxicology studies for the establishment of Codex MRLs. Every year, countries submit active molecules that should be scheduled for the JMPR priority list for new evaluation, re-evaluation and periodic reviews.

The chemicals listed in the schedule of priority for 2016 were as follows:

New evaluations: Acibenzolar-S-methyl, Oxathiapiprolin, Imazethapyr, Isofetamid, Pendimethalin and Pinoxaden,

New use and other evaluations: Benzovindiflupyr, Fipronil, Biprofezin, Chlorantraniliprole, Deltamethrin, Dimethomorph, Fluazifop-P-butyl, Bixafen, Fluensulfone, Flupyradifurone, Methoprene, Metrafenone, Saflufenacil, Spiromesifen, Sulfoxaflor and Tolfenpyrad.

Periodic Re-evaluations: Fenpropimorph, Penconazole and Teflubenzuron,

Position: Tanzania supports the adoption, at step 5 and step 5/8, of proposed draft and draft MRLs for different combinations of pesticide/commodity(ies).

Rationale: The low percentage of long and short term dietary exposure to the residues of the chemicals does not present any public health concern and therefore is unlikely to impede trade in the above commodities.

AFRICAN UNION

BACKGROUND: According to the Codex Procedural Manual, the JMPR evaluates residue and toxicology studies for the establishment of Codex MRLs. Every year, countries submit active molecules that should be scheduled for the JMPR priority list for new evaluation, re-evaluation and periodic reviews.

The chemicals listed in the schedule of priority for 2016 were as follows:

New evaluations: Acibenzolar-S-methyl, Oxathiapiprolin, Imazethapyr, Isofetamid, Pendimethalin and Pinoxaden,

New use and other evaluations: Benzovindiflupyr, Fipronil, Biprofezin, Chlorantraniliprole, Deltamethrin, Dimethomorph, Fluazifop-P-butyl, Bixafen, Fluensulfone, Flupyradifurone, Methoprene, Metrafenone, Saflufenacil, Spiromesifen, Sulfoxaflor and Tolfenpyrad.

Periodic Re-evaluations: Fenpropimorph, Penconazole and Teflubenzuron,

POSITION: African Union supports adoption at step 5 and step 5/8, of the proposed draft and draft MRLs for different combinations of pesticide/commodity(ies).

RATIONALE: JMPR risk assessment indicated low percentage of long and short term dietary exposure to the residues of the chemicals, hence they do not present public health concern and therefore are unlikely to impede trade in the above commodities.

Revision of the Classification of Food and Feed and revision and examples of representative
 commodities(vegetables)
 (REP 17/PR Paras 115, 127 and 140 Appendix VIII, XI)

Comments of Tanzania and African Union

TANZANIA

Background: Discussion on the revision of the Codex Classification of Food and Feed took place in the years 2010-2016 the Committee reached agreement for all ten crop groups of vegetables. The CCPR48 concluded discussions on the vegetable commodity groups and requested the EWG to compile all vegetable commodity groups finalized by CCPR to ensure consistency throughout the groups in order to send the entire vegetable commodity group to CAC40 (2017) for final adoption.

Position: Tanzania supports the adoption at Step 8 and Step 5/8 of the vegetable commodity Group together with the proposed consequential amendments to the fruit group related to the words “sub group of” and the changes to the CXLs.

Rationale: The commodities have (i) similar potential for pesticide residues; (ii) similar morphology; (iii) similar production practices, growth habits, etc.; (iv) similar edible portion; (v) similar GAP for pesticide uses; (vi) similar residue behaviour. The group also provides flexibility for setting (sub) group tolerances.

AFRICAN UNION

BACKGROUND: The CCPR48 concluded discussions on the vegetable commodity groups and requested an eWG to compile all vegetable commodity groups finalized by CCPR to ensure consistency throughout the groups in order to send the entire vegetable commodity group to CAC40 (2017) for final adoption.

POSITION: African Union supports adoption at Step 8 and Step 5/8 of the vegetable commodity Group together with the proposed consequential amendments to the fruit group related to the words “sub group of” and the changes to the CXLs.

RATIONALE: The commodities have (i) similar potential for pesticide residues; (ii) similar morphology; (iii) similar production practices, growth habits, etc.; (iv) similar edible portion; (v) similar GAP for pesticide uses; (vi) similar residue behaviour. The group also provides flexibility for setting (sub) group tolerances.

Proposed Draft Tables - Examples Of Selection Of Representative Commodities (Vegetable And Other Commodity Groups) (For Inclusion In The Principles And Guidance For The Selection Of Representative Commodities For The Extrapolation Of Maximum Residue Limits For Pesticides To Commodity Groups Rep17/Pr Para. 140, Appendix Vii Part B

Comments of Tanzania and African Union

TANZANIA

Background: During the 48th Session of the CCPR, the committee agreed to hold the tables at Step 2/3 for further discussion, comments and consideration at its 49th Session. CCPR49 adopted the proposed draft tables and recommended their adoption by the Commission at Step 5/8.

Position: Tanzania supports the adoption of the proposed draft Table 2 on Examples of selection of representative commodities (vegetable groups) and Table 3 on Examples of selection of representative commodities (grass groups) and its subsequent inclusion in the *Principles and guidance for the selection of representative commodities for the extrapolation of maximum residue limits for pesticides for commodity groups* (CAC/GL 84-2012).

Rationale: This will ensure consistency in the terminology and coding system and their location in the relevant tables for representative commodities including the allocation of some additional commodities as appropriate.

AFRICAN UNION

BACKGROUND: CCPR (2016), agreed to hold the tables at Step 2/3 for further discussion, comments and consideration at its 49th Session (2017). CCPR49 adopted the proposed draft tables and recommended their adoption by the Commission at Step 5/8.

POSITION: African union supports the adoption of the proposed draft Table 2 on Examples of selection of representative commodities (vegetable groups) and Table 3 on Examples of selection of representative commodities (grass groups) and its subsequent inclusion in the *Principles and guidance for the selection of representative commodities for the extrapolation of maximum residue limits for pesticides for commodity groups* (CAC/GL 84-2012).

RATIONALE: To ensure consistency in the terminology and coding system and their location in the relevant tables for representative commodities including the allocation of some additional commodities as appropriate.

Proposed Draft And Draft Revision Of The Classification Of Food And Feed: Grasses

Comments of Tanzania and African Union

TANZANIA

Grasses of cereal grains

Background: CCPR48 agreed on the grouping of Group 020–Grasses of Cereal Grain as follows: subgroups 020A Wheat; 020B Barley; 020C Rice; 020D Maize, Grain Sorghum and Millet and 020E Sweet Corn, with pseudo-cereals separated into either subgroup 020A Wheat or subgroup 020B Barley). Based on this agreement, the Committee agreed to send the Group 020 to the 40th Session of the Codex Alimentarius Commission (CAC40) for adoption at Step 5/8 and 8

Position: Tanzania supports adoption at Step 8 the draft and the proposed draft grass commodity group grasses of cereal.

Rationale: The commodities have (i) similar potential for pesticide residues; (ii) similar morphology; (iii) similar production practices, growth habits, etc.; (iv) similar edible portion; (v) similar GAP for pesticide uses; (vi) similar residue behaviour. The group also provides flexibility for setting (sub) group tolerances.

Grasses for sugars or syrup production

Background: The 48th Session of CCPR (CCPR48) agreed that the Electronic Working Group on the revision of the Classification chaired by the United States of America and co-chaired by the Netherlands would continue to work on Group 021 Grasses for Sugars or Syrup Production to look into the possible expansion and grouping of this Group including the possibility for multiple entries of commodities in different groups of the Classification and report back at the next session with a proposal for consideration. The Electronic Working group proposed to include a new group for “Tree Sap producers” and proposed the inclusion in the renamed type “Nuts, seeds and saps” or to create a new type for the new group.

Position: Tanzania supports the adoption at step 5/8 of the draft and the proposed draft grasses for sugars or syrup production of the classification of Food and Feed.

Rationale: The commodities have (i) similar potential for pesticide residues; (ii) similar morphology; (iii) similar production practices, growth habits, etc.; (iv) similar edible portion; (v) similar GAP for pesticide uses; (vi) similar residue behaviour. The group also provides flexibility for setting (sub) group tolerances.

AFRICAN UNION

BACKGROUND: CCPR48 agreed on the grouping of Group 020–Grasses of Cereal Grain as follows: subgroups 020A Wheat; 020B Barley; 020C Rice; 020D Maize, Grain Sorghum and Millet and 020E Sweet Corn, with pseudo-cereals separated into either subgroup 020A Wheat or subgroup 020B Barley). Based on this agreement, the Committee agreed to recommended adoption of Group 020 at Step 5/8 and 8.

POSITION: African Union supports adoption of the draft and the proposed draft grass commodity group i.e. Grasses of cereal grains at step 8.

RATIONALE: The commodities have (i) similar potential for pesticide residues; (ii) similar morphology; (iii) similar production practices, growth habits, etc.; (iv) similar edible portion; (v) similar GAP for pesticide uses; (vi) similar residue behaviour. The group also provides flexibility for setting (sub) group tolerances.

Guidelines on Performance Criteria for Methods of analysis for the
Determination of Pesticide Residues in Food and feed
(REP 17/PR Para 140 Appendix XI Part B)

Comments of Qatar, Tanzania and African Union

QATAR

MOPH have no comments or suggestions.

TANZANIA

Background: During the CCPR48(2016), there was general agreement on the proposed draft Guidelines on Performance Criteria for Methods of Analysis for the Determination of Pesticide Residues in Food. However,

it was noted that in light of the changes that had been made in the draft, delegations should reconsider the document at the next session (CCPR49) for finalization. At CCPR49, the committee agreed with the structure of the revised draft guidelines after incorporating additional changes. The Committee further agreed to forward the draft Guidelines to CAC40 for adoption at Step 8.

Position: Tanzania supports the adoption of the draft guidelines on the performance criteria for methods of analysis for the determination of pesticide residues in food and feed.

Rationale: The Guidelines define and describe the performance criteria which should be met by methods used to evaluate pesticide residues in food and feed for either domestic monitoring and/or international trade.

AFRICAN UNION

BACKGROUND: CCPR48 (2016), achieved consensus on the proposed draft Guidelines on Performance Criteria for Methods of Analysis for the Determination of Pesticide Residues in Food. However, it was noted that in light of the changes that had been made in the draft, delegations should reconsider the document at the next session (CCPR49) for finalization. CCPR (2017), achieved consensus on the structure of the revised draft guidelines after incorporating additional changes. Noting that all outstanding issues had been addressed, CCPR49 agreed to forward the draft Guidelines to CAC40 for adoption at Step 8.

POSITION: **African Union** supports the adoption of the draft guidelines on the performance criteria for methods of analysis for the determination of pesticide residues in food and feed.

RATIONALE: The Guidelines define and describe the performance criteria which should be met by methods used to evaluate pesticide residues in food and feed for either domestic monitoring and/or international trade.

Committee on Food Import and Export Inspection and Certification Systems
Comité sur les systèmes d'inspection et de certification des importations et des exportations alimentaires
Comité sobre Sistemas de Inspección y Certificación de Importaciones y Exportaciones de Alimentos

Draft Principles and Guidelines for monitoring the performance of National Food Control Systems (REP 17/FICS Para 18, Appendix II)

Comments of Nigeria, Tanzania and African Union

NIGERIA

Nigeria supports CCFICS recommendation for the adoption the draft principles and guidelines for monitoring the performance of national food control systems at Step 8.

Rationale

The draft principles and guidelines contains performance metrics that will enable countries to undertake self-assessment of the effectiveness of their NFCS or the NFCS of their trading partners in achieving food safety objectives and promoting trade.

TANZANIA

BACKGROUND: This guidance complements the Principles and Guidelines for National Food Control Systems (CAC/GL 82-2013). The draft principles and guidelines contain information on the purpose of performance monitoring; definitions; and sets out principles and performance monitoring logical framework for national food control systems (NFCS)

Position:Tanzania supports adoption at Step 8 the draft principles and guidelines for monitoring the performance of national food control systems.

Rationale:The draft principles and guidelines contains performance metrics that will enable countries to undertake self-assessment of the effectiveness of their NFCS or the NFCS of their trading partners in achieving food safety objectives and promoting trade.

AFRICAN UNION

BACKGROUND: This guidance complements the Principles and Guidelines for National Food Control Systems (CAC/GL 82-2013). The draft principles and guidelines contain information on the purpose of

performance monitoring; definitions; and sets out principles and performance monitoring logical framework for national food control systems (NFCS)

POSITION: African Union supports the adoption at Step 8, the draft principles and guidelines for monitoring the performance of national food control systems.

RATIONALE The draft principles and guidelines contain performance metrics that will enable countries to undertake self-assessment of the effectiveness of their NFCS or the NFCS of their trading partners in achieving food safety objectives and promoting trade.

**Committee on Methods of Analysis and Sampling
Comité sur les méthodes d'analyse et d'échantillonnage
Comité sobre Métodos de Análisis y Toma de Muestras**

Proposed draft and draft Methods of analysis for provisions in Codex standards
(for inclusion in CODEX STAN 234-1999)"

Comments of Ecuador and Tanzania and African Union

AFRICAN UNION

BACKGROUND: CCMAS agreed to replace Recommended Methods (RM-methods) for quick frozen vegetables, CAC/RM34, 43, and 54, with AOAC 963.26, AOAC 932.12 and AOAC 971.33, respectively. These RM methods for quick frozen vegetables were revoked as a result of their replacement with new methods.

POSITION: African Union supports the adoption of the proposed new recommended methods for quick frozen vegetables.

RATIONALE: To ensure the use of state of the science method to facilitate food control.

ECUADOR

Ecuador supports the list of recommended methods of analysis, reason that after the respective review were not issued comments

TANZANIA

CCMAS agreed to replace Recommended Methods (RM-methods) for quick frozen vegetables, CAC/RM34, 43, and 54, with AOAC 963.26, AOAC 932.12 and AOAC 971.33, respectively. These RM methods for quick frozen vegetables were revoked as a result of their replacement with new methods.

Position: Tanzania supports the adoption of the proposed new recommended methods for quick frozen vegetables.

Rationale: This is to ensure the use of state of the science method to facilitate food control.

**Coordinating Committee on Near East
Comité Coordinador FAO/OMS para el Cercano Oriente
Comité FAO/OMS de coordination pour le Proche-Orient**

Proposed Draft Regional Standard for Doogh (REP 17/NE Para 65, Appendix III)

Comments of Iran

IRAN

The new comments :

1- In section 2 and 3 , the word yoghurt is correct.

2- For section 4.1 the table below(with footnote) would be replaced.

Additive class	Un-heat treated doogh		Heat treated doogh	
	Plain	Plain	Plain	Plain
Carbonating agents	x(a)	x(a)	x(a)	x(a)
Emulsifiers(b)	x	x	x	x
Packaging gases	x	x	-	-
Preservatives	x	x	-	-
Stabilizers	x	x	x	x
Thickeners	x	x	x	x

(a) use of carbonating agents is technologically justified in Drinks based on Fermented Milk only. Carbon dioxide may incorporated by cold injection or fermentation (yeast and/or mesophilic bacteria).

x The use of additives belonging to the class is technologically justified. In the case of flavoured products, the additives are technologically justified in the dairy portion.

– The use of additives belonging to the class is not technologically justified.

Emulsifiers, packaging gases and preservatives listed in Table 3 of the General Standard for Food Additives (CODEX STAN 192-1995) are acceptable for use in Doogh categories as specified in the Table above.

3- Please edit for section 8.1.2 as highlighted changes: The descriptions of 'Carbonated/Uncarbonated' and/or 'Heat treated/Un-heat treated' shall be used in conjunction with the word 'Doogh'. For carbonated Doogh, the terms 'Doogh carbonated by fermentation' or 'Doogh carbonated by injection

**Codex Alimentarius Commission
Commission Du Codex Alimentarius
Comisión Del Codex Alimentarius**

Draft MRLs for Bovine Somatotropin (ALINORM 95/3, APPENDIX II)
Held At Step 8 By 23rd Cac, (ALINORM 03/41, PARA. 34)

Comments of African Union and El Salvador

AFRICAN UNION

BACKGROUND: The 35th Session of the Commission agreed to request JECFA to re-evaluate recombinant bovine somatotrophin (rBST) and to continue holding the draft MRLs for bST at Step 8, pending JECFA re-evaluation and CCRVDF recommendations (Ref. REP12/CAC paras 67-86).

CAC38 (2015) recognized the validity of JECFA's risk assessments as the sound scientific basis for its deliberations on rbSTs. However, the Commission, as the international risk management body recognized that consensus had not been reached on the adoption of the draft MRLs. In light of this, the Commission agreed to hold the draft MRLs for rbSTs at Step 8 to provide further time to facilitate a possible consensus and that the draft MRLs would continue to be on the agenda of the CAC and open to discussion (Ref. REP15/CAC paras 49-63).

POSITION: African Union supports adoption of the MRLs for rBST at Step 8.

RATIONALE: All the questions and concerns forwarded by CAC to JECFA was addressed by JECFA78. Based on a systematic review of the literature published since the last evaluation, JECFA reaffirmed its previous decision on the ADI "not specified" for somagrebove, sometribove, somavubove and somidobove. Following are questions forwarded by the 35th CAC to JECFA on rbSTs Matters which in our opinion have been adequately addressed:

- **Update the toxicological evaluation:** No new toxicological studies were available. Owing to structural differences between bovine and human somatotrophins, species-specific receptor binding of somatotrophins and lack of bio-activity of rbSTs following oral intake, the Committee concluded that if any rbST residues are present in milk or tissues, they would pose a negligible risk to human health.

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

The Committee also concluded that the literature did not support a link between exposure to IGF-I in milk from rbST-treated cows and an increased risk of cancer.

- **Consider new data and information related to the potential effects of rbSTs on the expression of certain viruses in cattle:** There was no new information on the link between rbSTs use and either potential stimulation of retrovirus expression or prion protein expression in cattle. The Committee considers that the position expressed by the previous Committee remains valid.

Consider new data and information related to the possible increased use of antimicrobials to treat mastitis in cows and aspects of antimicrobial resistance associated with the use of rbSTs in relation to human health: The Committee concluded that there was no evidence to suggest that the use of rbSTs would result in a higher risk to human health due to the possible increased use of antimicrobial agents to treat mastitis or the increased potential for non-compliant antimicrobial residues in milk. The Committee found no specific studies linking the use of rbSTs with the development of antimicrobial resistance. The Committee considers that the previous position remains valid.

EL SALVADOR

El Salvador apoya la adopción final en el trámite 8 para el siguiente documento:

- Proyecto de LMR para la Somatotropina Bovina. ALINORM 95/31, Apéndice II

**Committee on Milk and Milk Products
Comité sur le lait et les produits laitiers
Comité sobre la Leche y los Productos Lácteos**

Draft standard for dairy permeate powders (CX/CAC 17/40/3 Add.1, Annex 2)

Comments of India

INDIA

Since the initial stages of the development of this standard, India has been suggesting that its name should reflect the main characteristics of the high lactose content in dairy permeate powders. This concern was included in an earlier draft of the standard (CL 2015/28-MMP) but was removed subsequently. Thereafter, we have been continuously providing detailed justification for the reinsertion of this provision. However, each time a different reason has been cited for its non-inclusion in the standard. At the last CAC (2016) as well, while supporting adoption of the standard at Step 5, India had re-iterated that the name of the product should be revisited so as to reflect its true nature on the label. Such a provision will allow use of names that are understood by consumers in the developing countries where the term 'permeate' may not be prevalent and hence not correctly understood. There is precedence to this approach in the development other standards as well. Reference may be made to our comments at different stages for the related details. An important point to be noted is that the requested provision does not prevent use of the names like 'whey permeate powder' or 'dairy permeate powder', where these are well understood by the consumer and the industry. The resistance to the proposal, therefore, appears to be completely unwarranted.

The previous draft of the standard (CL 2016/46-MMP) included a provision for use of anticaking agents but the latest draft of the standard proposes that no additives are permitted for these products. We have also noted the interest of New Zealand and Australia in allowing use of anticaking agents in dairy permeate powders.

The provision to allow use of anticaking agents will be useful to those countries that may not currently have the technology to convert lactose to non-hygroscopic state before drying dairy permeates. On the other hand, removal of the provision has the potential to create non-tariff barriers to trade, especially of developing countries that may in future intend to manufacture dairy permeate powders, as they will find it difficult to manufacture/store good quality product without use of anticaking agents. The standard appears to favour those countries that are currently able to manufacture permeate powders without the use of anticaking agents.

It also needs to be recalled that this draft standard has been developed without any physical meeting of the relevant committee (CCMMP) and has, therefore, not had the benefit of discussions in a plenary, where more members could have participated and voiced their concerns.

In view of the above, it is not possible to support adoption of the standard at Step 8 in its current form.