



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
FAO/WHO COORDINATING COMMITTEE FOR NEAR EAST**

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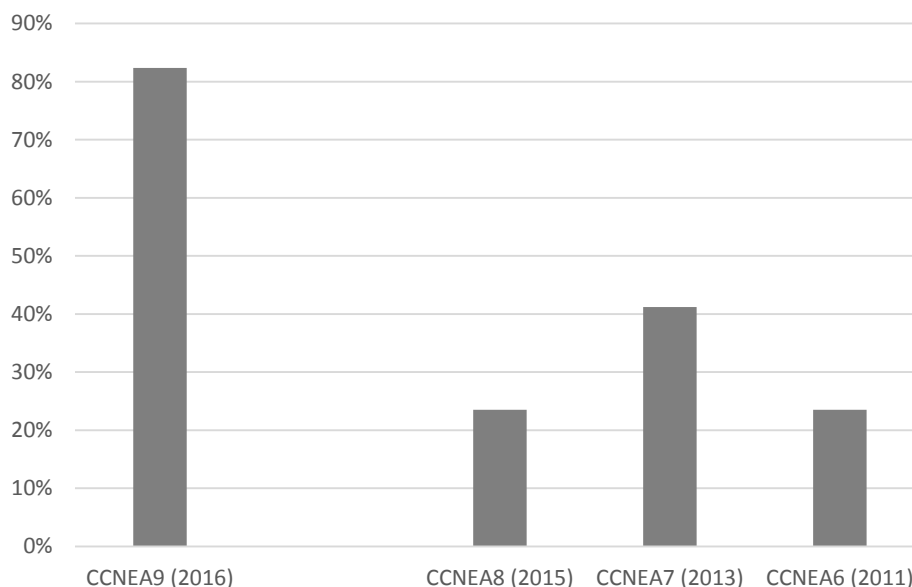
USE OF CODEX STANDARDS IN THE REGION

(Prepared by the Codex Secretariat)

BACKGROUND

1. Information on the national use of Codex standards and related texts was collected in the past via a circular letter and the information was utilised as the basis for discussion in all Regional Coordinating Committee (RCC) meetings.
2. In FAO/WHO Coordinating Committee for Near East (CCNE) and other RCCs the reply rates to the circular letter were generally low. In addition, members often made oral reports during sessions, which further complicated the analysis and the preparation of meaningful conclusions on the overall picture. As shown in **Figure 1**, replies to the question on the use and relevance of Codex standards and related texts (hereafter "Codex standards") in the past decade have never exceeded a level of 50 percent of the CCNE membership. At CCNEA8 for example, only three out of a possible 17 members replied to the circular letter while one more submitted relevant information as a conference room document, constituting an overall response rate of 24 percent.

Figure 1: Percentage of CCNE members that informed about the national use and relevance of Codex standards in writing since 2011



3. After the discussion on the revitalization of the RCCs it was decided to terminate the use of the circular letter and to replace it with a system to continuously collect data online for all six Coordinating Committees. As an initial step towards a more systematic approach to the questions on the use of Codex standards, and in an attempt to enhance the related data collection system, the Codex Secretariat developed a survey in cooperation with FAO and WHO for distribution to all RCCs. In the case of CCNE, the survey was sent out on 25th August 2016.
4. The survey was conducted online using the software SurveyMonkey which allows for easier data analysis and representation. Separate translations into French and Arabic were also made available and members were given a period of seven months to provide answers.

5. Given that questions on the general use of Codex standards had in the past not led to comparable or representative data it was decided to focus on specific standards that would be widely known and representative for their respective categories (i.e. numerical standards, general subject standards and general principles). Based on this assumption the survey covered:
- The use of Maximum Residue Levels (MRLs) for pesticides in food and feed;
 - The use of three general subject standards *General Standard on Food Additives* (CODEX STAN 192-1995), *Contaminants and Toxins in Food and Feed* (CODEX STAN193-1995), *Labelling of Prepackaged Foods* (CODEX STAN 1-1985); and
 - The use of *General Principles of Food Hygiene* (CAC/RCP 1-1969).
6. In addition, members were asked about difficulties related to the general use of Codex standards and were informed that other specific standards could be covered in future rounds to build up, over time, a representative data set on the use of Codex texts worldwide.

ANALYSIS AND DISCUSSION SURVEY RESULTS

7. The survey on the use of Codex standards obtained a response rate of 82 percent (14 out of a possible 17 member countries) in the NE region (as of March 2017), which is the highest level achieved up to now. **Table 1** below marks all respondents in the region in bold.

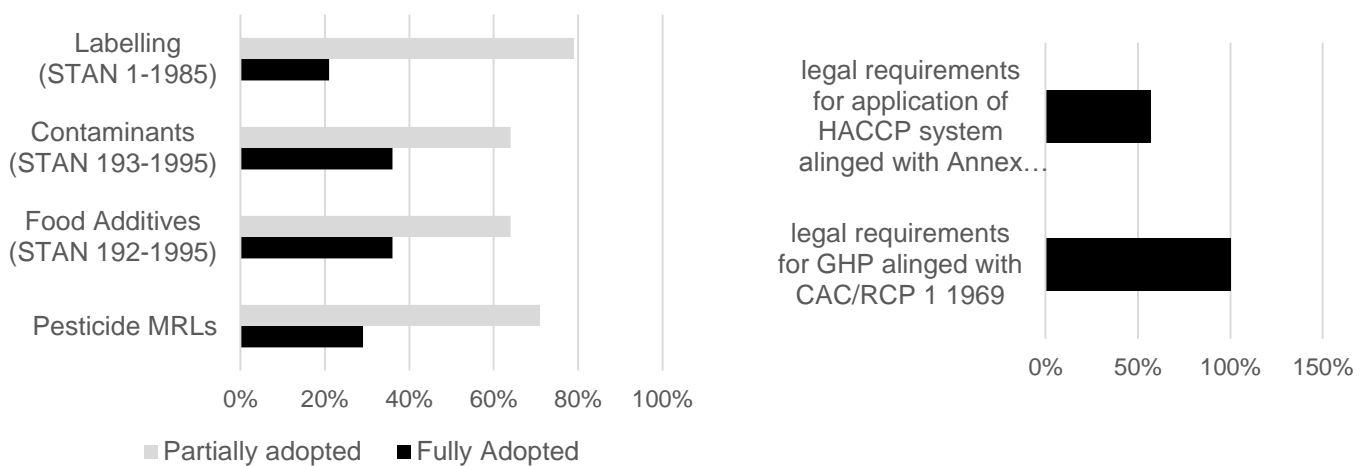
Table 1: Overview of respondents in the Near East to the 2016 survey on use of Codex standards (respondents are in bold)

Algeria	Kuwait	Sudan
Bahrain	Lebanon	Syrian Arab Republic
Egypt	Libya	Tunisia
Iran (Islamic Republic of)	Oman	United Arab Emirates
Iraq	Qatar	Yemen
Jordan	Saudi Arabia	

8. The full survey results can be found in the Appendix (in original language). The following is a summary.
- i. *Use of Codex MRLs for pesticides in food and feed*: While 29 percent of the respondents fully adopted Codex MRLs for all pesticides regulated at national level, the majority of countries (71 percent) partially use them, but clearly reference them in national legislation.
 - ii. *Use of the General Standard for Food Additives (Codex STAN 192-1995, GSFA)*: The technical content, structure and wording of the national regulation(s) are in 36 percent of the countries comparable to the GSFA or only contain minimal editorial changes for the regulated additives. 64 percent of respondents answered that they have partially adopted the GSFA, which means that only parts of their national standards or regulations are identical to the GSFA or that their national texts contain some technical deviations from what is stipulated in the GSFA (e.g. Codex MLs for some additives). Several countries also stated to use food additive provisions set by EU along with the Codex standard.
 - iii. *Use of General Standard for Contaminants and Toxins in Food and Feed (Codex STAN 193-1995, GSCTFF)*: The standard is fully adopted by 36 percent and partially adopted by 64 percent of the respondents. As in the case of the GSFA some countries are combining reference to the Codex standard with reference to EU provisions for contaminants.
 - iv. *General Standard for the Labelling of Pre-packaged Foods (Codex STAN 1-1985)*: The standard is partially adopted by 79 percent of countries in the region, while the remaining respondents have a full adoption of the standard in place.
 - v. *Use of General Principles of Food Hygiene*: All respondents stated to have national legal requirements for Good Hygienic Practices related to food in their country and aligned their legislation with the *General Principles of Food Hygiene* (CAC/RCP 1-1969). In addition, 64 percent also have requirements for the application of the Hazard Analysis and Critical Control Point (HACCP) system in their country which, in all but one case, are according to Codex provisions (i.e. Annex 1 to CAC/RCP 1-1969). Others countries stated to have voluntary provisions in place that reference Codex and ISO.

- vi. *Difficulties with regards to the use of Codex provisions:* The most frequently stated difficulty regards the adaptation of Codex standards to the national context, in particular in underdeveloped areas. Other difficulties stated were:
- Insufficient local local capacity and institutional knowledge of Codex standards;
 - Inexistence of Codex standards or differences between Codex and EU or FDA standards;
 - Language barriers as most of the guidance is not available in the national language or the translation quality is insufficient to serve as a basis for the elaboration of national regulations;
 - Insufficient resources to participate in standard setting process leading to lack of national ownership and awerness; and
 - Lack of political understanding of Codex among decision-makers as well as a lack of interest from donors.

Figure 2: Use of Codex standards and related texts in the Near East region



CONCLUSIONS AND RECOMMENDATIONS

ConclusionS

- Overall, the survey on the use of Codex standards obtained a relatively high completion rate of 82 percent and respondents generally judged the survey as easy to complete and well explained. The information is thus considered representative for the region.
- As shown in **Figure 2**, all surveyed Codex standards are used in the region and Codex standards are an essential reference point for the national legislation. Full adoption is highest in the case of the standards for contaminants and toxins in food and feed and food additives. The general principles for food hygiene (GPFH) are adopted in all of the responding countries and more than half of them have also adopted the HACCP system in their legislation according to Codex guidance.
- For many countries in the Near East region difficulties in the use of Codex standards are related to their adaptation to the national context, in particular in underdeveloped areas, followed by the resource investments and capacity building required in order to use Codex standards.

Recommendation

- The survey provides information that could support future national assessments and actions in the region. CCNE is requested to take note of the results of the survey and to provide inputs on the following questions that could guide future action by the Codex Secretariat in this area:
 - Format and approach:* Are you satisfied with the design of the survey? Do you agree with the approach chosen and explained in paragraphs 5 and 6?
 - Use of the results:* Do you consider the results useful? If so, would you like to have the information stored online (i.e. embedded in the Codex website) providing an opportunity to update national information and review the information of other countries?
 - Scope of next survey:* Which areas of Codex work would you like to see covered in future (if any)?

**APPENDIX
ORIGINAL LANGUAGE ONLY
– SURVEY QUESTIONS AND ANSWERS**

Question 1. To what extent are Codex MRLs for pesticides in food and feed adopted in your country?

Fully adopted	4	29%
Partially adopted	10	71%
Not used at all	0	0%
Don't know	0	0%
	14	100%

Question 2. Please use this field to provide any additional comments or explanations (max. 100 words).

<p>Our national MRL standard is based on risk assessment, by considering consumption of any crops, kind of pesticide which are recommended and applied on any crops. For those new imported commodities Codex MRLs are applicable by considering the list of registered pesticides in our country. We have used codex MRLs for most pesticides. For some compound we have calculated based on TMDI.</p>
<p>Codex MRLs are used and considered in imported and exported grains, wildlife feed and silage, straw, lay green, forages and oil seed crops. There are difficulties to determine the exact limit and to provide a certificate due to unaccredited laboratories. A specialized laboratory for pesticide residue analysis is not available, some equipment is located in the laboratories of universities, agriculture research centers and the federal ministry of health.</p>
<p>We dont have a standard for pesticides in food and feed maximum levels, but we have technical legislation issued by the ministry of agriculture partially dependent on the maximum levels of codex MRLs</p>
<p>There is a ministerial decree of Minister of Trade and Industry no. 244/2016 referenced to Codex MRLs, beside full adoption of Codex MRLs as a standard.</p>
<p>The current standard related to food additives is going to be revised and considered as an old standard that has not been revised since 1995, keeping in mind those standards that are up for revision or approval must consider the nation's privacy as well as CODEX STAN 192-1995 and the European directive.</p>
<p>في غياب تنظيم وطني أو مواصفة وطنية متعلقة بالحدود القصوى لمخلفات المبيدات في الأغذية فإنه يعتمد على مواصفات الدستور الغذائي في هذا المجال. كما نشير أن المرسوم التنفيذي رقم 366-14 المؤرخ في 15 ديسمبر 2014 المحدد للشروط و الكيفيات المطبقة في مجال الملوثات المسموح بها في المواد الغذائية يحيل إلى عدة نصوص تطبيقية منها تحديد القوائم و الحدود القصوى لبقايا الملوثات (بما فيها بقايا المبيدات) المسموح بها في المواد الغذائية.</p>
<p>For some MRL we follow the European norms as EU is our export market.</p>

Question 3. To what extent is the General Standard for Food Additives (CODEX STAN 192-1995) adopted in your country?

Fully adopted	5	36%
Partially adopted	9	64%
Not used at all	0	0%
Don't know	0	0%
	14	100%

Question 4. Please use this field to provide any additional comments or explanations (max. 100 words).

Some additives are permitted in some food and vice versa, for example, the use of color in dairy products is not allowed. Sometimes the amount of use permitted by this standard is different and generally considered to be less than it is associated with the consumption culture or the possibility of monitoring the intake of food so the contents of this national standard will be based on different items.
The general standard for food additives are well adopted as far as the categories and notes are concerned, however food additives which originated from pigs and other members of the pig family, in addition to alcoholic sources and those soluble only in alcohols are banned due to religious faith and concerns.
We have a package of standards for food additives based on Codex 192-1995 and European legislations/ our standardization organization has issued many standards for food additives, some of them fully adopted from CODEX STAN 192-1995, while others like (preservatives and sweeteners) adopted from European legislations
There is a ministerial decree of Minister of Health and Population no. 204/2015 referenced on Codex STAN for Food Additives
The current Tunisian standard related to food additives is going to be revised and considered as an old standard that has not been revised since 1995, keeping in mind those standards that are up for revision or approval must consider the nation's privacy as well as CODEX STAN 192-1995 and the European directive.
*فيما يخص الإضافات الغذائية الموجهة للإستهلاك البشري، يستند التنظيم الوطني أساساً على مواصفات الدستور الغذائي المتعلقة بالمضافات السائلة الذكر مع الأخذ بعين الاعتبار ببعض التعديلات، لاسيما المقترحة من طرف وزارة الصحة والسكان وإصلاح المستشفيات. *التنظيم الساري المفعول المتعلق بالمضافات الغذائية الموجهة للإستهلاك البشري يرتكز على المرسوم التنفيذي رقم 214-12 المؤرخ في 15 مايو 2012 المحدد لشروط وكيفيات استعمال الإضافات الغذائية في المواد الغذائية الموجهة للإستهلاك البشري وكذا ملاحقه، كما يتم تكييف هذا التنظيم وفق مواصفة الدستور الغذائي.
For additives which are not yet in the Codex list we follow other standards using a trial tree for this subject.

Question 5. To what extent is the *General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995)* adopted in your country?

Fully adopted	5	36%
Partially adopted	9	64%
Not used at all	0	0%
Don't know	0	0%
	14	100%

Question 6. Please use this field to provide any additional comments or explanations (max. 100 words).

Being a member of the international standards organization and Codex, we follow the latest international scientific protocols as well as taking the country's special needs into account. About food contaminants there are national standards including guidelines for prevention and reduction of contaminants such as Mycotoxins, PAH, Dioxin, Nitrate and Heavy metals in food and feed, standard for maximum limits of contaminants in food and feed, test methods and sampling method for determination of some contaminants and HACCP. Many of these standards (guidelines and sampling) are according to Codex if they have been developed by Codex. Test methods are according to ISO or CEN method and maximum limit have been set up by using Codex standard or based on national risk assessment.

We full adopted the relevant standards and code of practices according to our agriculture production and manufacturing system. Aflatoxin in different animals in feed range between 20ug/kg; Lead 5 mg/kg, Cadmium 0.3mg/kg, Arsinic 1.0mg/kg, Mercury 0.5 mg/kg, Floride 350 mg/kg
We only use the standard for heavy metals
We depend on combining references of Codex and EU regulation
A decision was made concerning this subject and this decision was is in line with the provisions of CODEX STAN 193-1995 and the European Legislation: the CE 1881/2006 Law. Some revisions and amendments will be made regarding this resolution.
فيما يخص الملوثات المسموح بها في الأغذية فإن المرسوم التنفيذي رقم 366-14 المؤرخ في 15 ديسمبر 2014 يحدد الشروط و الكيفيات المطبقة في مجال الملوثات المسموح بها في المواد الغذائية يستمد مبادئه الأساسية من هذه المواصفة وكذا المواصفات الأخرى لهيئة الدستور الغذائي.
Sometimes we follow the Market demand for example limit of aflatoxin.

Question 7. To what extent is the *General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985)* adopted in your country?

Fully adopted	3	21%
Partially adopted	11	79%
Not used at all	0	0%
Don't know	0	0%
	14	100%

Question 8. Please use this field to provide any additional comments or explanations (max. 100 words).

There is national standard No.4470 about it that has written in 1988 and recently we revised it too, is available.
Due to the fact that there are no national standards for labeling, The codex standards are partially adopted beside other standards, for example ISO standards.
The concerned ministries rendered a joined decision in 2008 based on the Codex standards. It is now in the process of revision on the basis of the updated version of the Codex standard on food labelling that in based on the European legislations.
يستمد التنظيم الساري المفعول و المتمثل في المرسوم التنفيذي رقم 378-13 المؤرخ في 9 نوفمبر 2013 المحدد للشروط و الكيفيات المتعلقة بإعلام المستهلك لاسيما فصوله الأول و الثاني و الثالث و السادس من مواصفة الدستور الغذائي المتعلقة بوسم الأغذية المعبئة مسبقا.

Question 9. Do you have legal requirements for Good Hygienic Practices (GHP) related to food in your country?

Yes	14	100%
No	0	0%
Don't know	0	0%
	14	100%

Question 10. If yes, is your legislation aligned with the *General Principles of Food Hygiene (CAC/RCP 1 -1969)*?

Yes	14	100%
No	0	0%
Don't know	0	0%
	14	100%

Question 11. Do you have legal requirements for the application of the Hazard Analysis and Critical Control Point (HACCP) system in your country?

Yes	9	64%
No	4	29%
Don't know	1	7%
	14	100%

Question 12. If yes, is your legislation aligned with the HACCP system and guidelines for its application (Annex 1 to CAC/RCP 1 -1969)?

Yes	8	57%
No	4	29%
Don't know	2	14%
	14	100%

Question 13. Please use this field to provide any additional comments or explanations (max. 100 words).

There is legal requirement and it is included in the related standards. There are legal requirements for specific products to be exported (e.g. fish) based on CAC/RCP 1-1969. Food manufacturing companies may voluntarily apply HACCP.
We have issued national standard for HACCP but it is not obligatory.
There is a standard which is 100% equal to CAC/RCP-1-1969, but its application is not compulsory. However, there are special provisions related to certain fields such as foods of animal origin, tourist hostel kitchens which imposes the need to create a system of risk analysis and critical control points as set forth in the Codex or ISO22000 standard. Also, we prepared a project regarding a law on food safety which is considering these principles. This (draft) law is in the process of approval.
يجدر الذكر أن المرسوم التنفيذي رقم 82-04 المؤرخ في 18 مارس 2004 المحدد لشروط و كفاءات منح الإعتماد الصحي للمنشآت التي يرتبط نشاطها بالحيوانات و المنتوجات الحيوانية وذات المصدر الحيواني و كذا نقلها المعدل بالمرسوم التنفيذي رقم 90-10 المؤرخ في 10 مارس 2010 قد أدرج في أحكامه إلزامية وضع نظام تحليل المخاطر و نقاط المراقبة الحرجة قصد الحصول على الإعتماد الصحي (HACCP).
يتم حاليا إعداد مشروع مرسوم تنفيذي يحدد شروط عرض المواد الغذائية الموجهة للاستهلاك البشري (شروط النظافة) و هذا تطبيقا لأحكام المادة 6 من القانون رقم 03-09 المؤرخ في 25 فيفرا بر 2009 و المتعلق بحماية المستهلك و قمع الغش والذي من خلاله ستعمم إلزامية تطبيق نظام تحليل المخاطر السالف الذكر على كل المنشآت. كما سيسمح لجمعيات المهنيين بإعداد دليل الطرق الحسنة للنظافة حسب كل شعبة على أن تكون هذه الدليل مستمد من الخطوط التوجيهية للنظافة لهيئة الدستور الغذائي و كذا مشروع المرسوم و هذا بعد المصادقة عليه من طرف القطاعات الوزارية المعنية.
Generally most of our standards based on international standards, such as the Codex and the ISO. Codex Standards are the main references to the elaboration of national legislation. We adopt most Codex Standards and code of practices and even general guidelines. But sometimes there are some parts of the Codex standards that cannot be applied because they do not comply with the national reality.

Question 14. Where do you see the biggest difficulties with regards to the use of Codex standards and related texts?

<p>Maybe difficulties in the use of c codex standards are related to limitation for adapting text. Adoption of texts are based on trade issues. For those compound that Codex has no Limits. Some codex standards have big difference with the other standards like EU.</p>
<p>There are no difficulties regarding the use of codex standards and related texts. • Some communication issue related to the internet • Difficulties usually arise when adopting the specifications and consulting the recent codex -Stan issues, The biggest difficulties are that new issues don't state clearly on the fate of previous additives, which are allowed formerly wither they are maintained or omitted, realizing that they are not mentioned in the new issue for the same product for which they were allowed.</p>
<p>1- text of standard in Arabic 2- unavailable human resource skills for adequate implementation or standards and related texts not sufficiently responding to national needs. 3- too high resource investments deriving from their adoption</p>
<p>It depends on the standard, for example, some times the related texts are not sufficiently responding to national needs.</p>
<p>in implemting the codex standards in small establishments, and the difficult current situations nowadays. we need to participate in codex meetings to set our opinions. /we have difficulties in implemting Codex standards and related texts in small and non developed establishments, in addition to the current crisis in our country which afecting badlly on the sector of food industry. from other side we have missed alot of expert persons in our country.</p>
<p>There are many challenges we are facing with regards to the implementation of Codex standards most notably lack or limintation of human resources and training on Codex standards.</p>
<p>Arabic translation of Codex text</p>
<p>Legislative laws all over Tunisia are consistent with Codex standards and provisions, unless there is a slight difference from the European standards, which, in some cases poses more constraints than Codex. In this case, the European legislations are taken into account for commercial purposes.</p>
<p>Training to interpret the requirements of the standard. Persons/companies normally require the NSB's to go through the standard and explain the requirements. Taking into account that Codex standards remain the first resource when requests for food based standards are made.</p>
<p>Lack of political understanding of Codex among decision-makers. Lack of interest of donors.</p>
<p>نسجل بعض الصعوبات في مجال المواصفات المتعلقة بالمضافات الغذائية بالنظر لأن بعض المواصفات الخاصة بالمنتجات تحدد المضافات المسموح بها والتي هي محددة بمواصفة عامة. غياب بعض المواصفات مثل تلك المتعلقة بالجبن الذائب. الخبرة في مجال بقايا المبيدات و بقايا الأدوية البيطرية.</p>
<p>The main problem regards products where there are no codex standards and the main difficulties is the difference between Codex standards and EU an FDA standards.</p>

Question 15. Please use this field to provide any additional comments on the use of Codex standards and texts (max 100 words).

<p>There is a need to translate all codex standard and code of practices to have an Arabic language version to harmonize the terms and language between Arab countries. On the issue of labeling, the expiry date and recommended storage conditions are suggested to be included in permission for the use of food additives, and not leaving that for the manufactures. The use of codex standards is the most important and widely used in the preparation of national standards.</p>
<p>we need to re participate in codex meetings to give our view points about codex standards to remove any obstacles to implemnt them</p>

It is a good idea to have such this survey, but we looking for more awarnes, training etc.as the regional level which it can help to improve and implementation our work closely with codex Standards in different sectors.

We note that the Codex Standards form the fundamental basis in preparing the regulation on food safety in Algeria, but it remains to take advantage of the Codex Alimentarius Commission experts in the field of composition of the persons concerned by matching the applicable standards of food regulation with the Constitution, more than urgent.

نشير أن مواصفات الدستور الغذائي تشكل القاعدة الأساسية في إعداد التنظيم المتعلق بسلامة الأغذية في الجزائر، إلا أنه تبقى الاستفادة من خبراء هيئة الدستور الغذائي في مجال تكوين الأشخاص المعنيين بمطابقة التنظيم الساري المفعول مع مواصفات الدستور الغذائي، أكثر من ملحة.

Question 16. Were the survey explanations and choices adequate for you to answer the survey questions?

Yes	14	100%
No	0	0%
Don't know	0	0%
Total	14	100%

Question 17. On a scale of 1- 5 how difficult was it for you to answer this survey (1 being very easy, 5 very difficult)?

1	2	3	4	5	Total
6	3	4	0	0	13