

4 June 2003

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 6

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Twenty-sixth Session, FAO Headquarters, Rome, Italy, 30 June - 7 July 2003

PROPOSED DRAFT STANDARDS AND RELATED TEXTS AT STEP 5

COMMENTS ON PROPOSED DRAFT STANDARDS AND RELATED TEXTS SUBMITTED AT STEP 5

FAO/WHO COORDINATING COMMITTEE FOR ASIA

Instant Noodles (Standard) - ALINORM 03/15; Appendix II, para(s) 74

No comments received as at 30/05/2003

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Risk Analysis Principles (Advisory text) - ALINORM 03/12A; Appendix IV, para(s) 28

No comments received as at 30/05/2003

Food Category System of the General Standard for Food Additives (Standard) - ALINORM 03/12A; Appendix II, para(s) 51

No comments received as at 30/05/2003

Principles for Exposure Assessment of Contaminants and Toxins in Foods (Advisory text) - ALINORM 03/12A; Appendix VIII, para(s) 119

AUSTRALIA

Australia would like to submit the following comment on the proposed draft CCFAC Policy for Exposure Assessment of Contaminants and Toxins in Foods or Food Groups.

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W0000

In relation to Paragraph 7, Australia suggests that the first sentence be rewritten and the words "...for analytical laboratories system..." be removed as it is not clear what these words mean. The sentence should read "JECFA uses available data from member countries and from the GEMS/Food Operating Program on contaminant levels in foods and the amount of foods consumed to estimate total dietary exposure to a contaminant or toxin."

In Annex I, under "JECFA" column, Australia suggests that the second box should read "Perform a risk assessment - optional if required by CCFAC".

In Annex I, under "Member States" column, first box should read "Identification of a potential health risk for a contaminant".

In Annex I, under "Member States" column, 4th box down, the words should read "propose risk management options (ML's or/and codes of practice)".

In Annex I, under "Member States" column, 4th box down, there should be a dotted line from the box containing the words "Propose risk management options (ML's or/and codes of practice)" and the box below containing the words "Elaborate risk management decisions for main contributors and discuss proposed draft ML's".

Prevention and Reduction of Aflatoxin Contamination in Peanuts (Code of Practice) - ALINORM 03/12A; Appendix XI, para(s) 136

No comments received as at 30/05/2003

Maximum Levels for Cadmium in various Commodities (Maximum Levels) - ALINORM 03/12A; Appendix XIV, para(s) 165

JAPAN

The 33rd CCFAC advanced the draft guideline level for cadmium in cereals, pulses and legumes (excluding wheat, rice, soybeans and peanuts) to Step 8 and all the proposed draft maximum levels for cadmium under consideration to Step 5 (ALINORM 01/41, paras. 168-169). The 24th Codex Alimentarius Commission adopted the draft guideline level as a maximum level (ALINORM 01/41, para. 133) but the 49th Executive Committee decided to return all of the proposed draft maximum levels to Step 4 in view of the need to consider overall dietary intake data (ALINORM 03/3, para.20). The 34th CCFAC also returned those maximum levels to Step 3. The Committee agreed to request JECFA to perform an exposure and risk assessment for cadmium resulting from consumption of foods for which the maximum levels were proposed. There was no discussion about those maximum levels, except those proposed for discontinuation, at the 50th Executive Committee or 51st Executive Committee.

The 35th CCFAC advanced the proposed draft maximum levels for cadmium in fruits; wheat grain; meat of cattle, pigs, sheep and poultry; horse meat; potato; stem and root vegetables (excluding celeriac and potato); leafy vegetables, herbs; fungi, edible; celeriac; other vegetables (excluding fungi and tomato) for adoption by the 26th Commission at Step 5, while it returned the proposed draft maximum levels for rice(polished), soya bean(dry), mollusks (including cephalopods) and peanuts at Step 3. (ALINORM 03/12A, para.165)

Japan believes that CCFAC shall base draft maximum levels on JECFA's risk assessments as stipulated in Section 3.3 of the Codex General Standard for Contaminants and Toxins in Foods. Since Japan had submitted data to the 61st JECFA to be held in June this year for conducting a risk assessment, we are of the opinion that the 35th CCFAC should have returned all the proposed draft maximum levels to Step 3 pending the risk assessment of cadmium by the 61st JECFA.

In addition, we should pay attention to the fact that the maximum level for cereals, pulses and legumes was adopted without clear indication of what commodities are covered by this maximum level, which requires some clarification, such as adding relevant commodity codes. As a consequence to this, the CCFAC may need reconsider and amend the code numbers included in "other vegetables".

Conclusion

For the reasons above, we consider that the Commission should:

- return the proposed draft maximum levels for cadmium in fruits; wheat grain; meat of cattle, pigs, sheep and poultry; horse meat; potato; stem and root vegetables(excluding celeriac and potato); leafy vegetables, herbs; fungi, edible; celeriac; other vegetables (excluding fungi and tomato) to Step 3 pending risk assessment by the 61st JECFA; and
- request the CCFAC to clarify to what food commodities each maximum level applies (not only for cadmium maximum levels but also for other contaminants).

We are willing to undertake work, if the CCFAC proceeds with adding food commodity codes to maximum levels.

Prevention and Reduction of Lead Contamination in Food in Food (Code of Practice) - ALINORM 03/12A; Appendix XII, para(s) 152

No comments received as at 30/05/2003

CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Model Certificate for Fish and Fishery Products (Advisory text) - ALINORM 03/18; Appendix V, para(s) 101

IRAN

5.2.7 Lot identifier /Date code

Due to the number of lots in one consignment it would be too difficult to include all of the content ALINORM03/18 Appendix V/Annex 1 of the certificate form for the fish products to be included in the fourth column of the lot identifier date code .Then it is suggested that the phrase "Lot identifier "or "Container "be included in the column so that which ever is practical be included in the table.

Quick Frozen Lobsters (Amendment) (Standard) - ALINORM 03/18; Appendix VI, para(s) 115

IRAN

2.2 Process Definition

The sentence " that the range of temperture of maximum crystallization is passed quickly", brought in the "Process definition " section ,looks ambiguous as neither the adverb "quickly "nor the phrase "Range of temperture of maximum Crystallization"has been elaborated more.so they are suggested to be modified as :

The freezing process shall be carried out in the appropriate in such way that the range of maximum Crystallization[-1(-5) oC]is 2 hours or less.the quick freezing process shall not be regarded as complete unless and until the product temperature has reached -18 0C or colder thermal centre after thermal stabilization .the product shall be kept deep frozen so as to maitain the quality during transportation ,storage and distribution .

Of course it was also acceptable to pass through from -1 oC to-5 oC in more than 2 to 8 hours ,but in it is advised that in labelling process "quick frozen " be replaced by only "frozen".

UNITED STATES

Proposed Draft Model Certificate for Fish and Fishery Products

The United States supports the adoption of the sanitary certificate as the default certificate.

Proposed Draft Amendment to the Standard for Quick Frozen Lobsters

The United States supports the addition of the Squat lobster to the Standard for Quick Frozen Lobsters if derived from the species of *Pleuroncodes monodon* and *Cervimundia johni* at Step 5. Additionally, the United States notes that the Draft Standard for Quick Frozen Lobsters may need to be further amended to include other species of lobsters such as *Pleuroncodes planipes* that are internationally traded on a large scale

CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES

Table Grapes (Standard) - ALINORM 03/35; Appendix VI, para(s) 103

No comments received as at 30/05/2003

CODEX COMMITTEE ON FOOD HYGIENE

Code of Hygienic Practice for Milk and Milk Products (Code of Practice) - ALINORM 03/13A; Appendix III

EGYPT

Introduction

Egypt suggests the following:

- To replace the first sentence of the second paragraph “All foods have no exception“ with “All foods, especially milk and milk products have the potentiality to cause food borne illness”

To add the words “and the HACCP” at the end of the following sentence:

- “This document is formatted in accordance with the Recommended International Code of Practice – General Principles of Food Hygiene, CAC/RCP 1-1969, Rev. 3, 1999.”

Egypt finds that the contaminants can include other sources of contamination. Therefore, it proposed to amend the sixth sentence of the second paragraph as follows:

- “Potential also exists for the contamination of milk with the residues of veterinary drugs, pesticides, aflatoxins and the maximum limits of heavy metals and radio nuclides”.

2-Scope and the use of the document

2.1 Scope

Egypt suggests to insert (,) between the words “production processing” in the first line to be as follows: “production, processing”

2.5 Definitions

Egypt recommends to add the definition of “Hazard” to the list of definitions

Shelf life

It is proposed to add the following wording “and remains acceptable in flavour after packaging” after the word “suitability” for clarification.

Establishment of Shelf Life

Egypt suggests the insertion of “and handling conditions” after “storage conditions” because handling conditions such as distribution and transport conditions affect the shelf life of the products.

As regards the establishment of the product shelf life in Egypt, it is the responsibility of the manufacturer, but under the supervision of the competent authority i.e. Egyptian Organization for Standardization and Quality Control (Egypt), in which the manufacturers are participants in its committees.

B.1 Pasteurization of milk and fluid milk products

B.1.2 Process management

Process criteria

Egypt comments on the second paragraph as follows:

Processing at temperature above 72° c is validated now and there is no need for any current revision by experimental techniques. Therefore, Egypt suggests the inclusion of the following schedule of temperature-time combination that are considered equivalent to pasteurization.

Temperature	Time	Temperature	Time
89° c	1s	96° c	0.05 s
90° c	0.5 s	100° c	0.01 s
94° c	0.1 s		

As regards the changes in the composition of the product as in cream, Egypt would like to inform the Committee on Food Hygiene that the minimum temperature-time conditions for pasteurization of cream were approved at the 64th annual meeting of IDF in 1980. Examples of these temperature-time combination are as follows:

- The fat content of cream is 18%, to be pasteurized at 75° c for 15 seconds.
- The fat content of cream is 35% or more, to be pasteurized at 80° c for 15 seconds.

UNITED STATES

The United States supports the preliminary adoption of the Proposed Draft Code of Hygienic Practice for Milk and Milk Products at Step 5. The United States notes that the current Proposed Draft Code reflects the obligations of countries under WTO agreements (particularly the SPS Agreement), incorporates an outcome-based approach and is designed to allow sufficient flexibility to meet the needs of both developed and developing countries with regard to primary production conditions and manufacturing requirements of the many types of dairy products produced around the world.

INTERNATIONAL COUNCIL OF GROCERY MANUFACTURERS ASSOCIATIONS - ICGMA

ICGMA Supports the document forwarded by CCFH at Step 5

AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON FRUIT AND VEGETABLE JUICES

Proposed Draft Minimum Brix Levels for Reconstituted Juice and Reconstituted Purée and Minimum Juice and/or Purée Content for Fruit Nectar (5 v/v) – grape, guava, mandarine, mango, passion fruit and tamarind (Indian date) juice (Proposed Draft General Standard for Fruit Juices and Nectars at Step 5/8) - ALINORM 39A; Appendix III, para(s) 88

Comments received will be summarised on a separate document (ALINORM 03/26/8A, Add. 1) as dateline for comments to CL 2003/19-FJ, Item A2 is 20 June 2003.

CODEX COMMITTEE ON FOOD LABELLING

Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods: Section 5 - Permitted Substances: Annex 2 (Guidelines) - ALINORM 03/22A; Appendix VI

Comments received will be summarised on a separate document (ALINORM 03/26/8A, Add. 1) as dateline for comments to CL 2003/18-FL, Item A5 is 10 June 2003.

CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

Guidelines on Sampling (Guidelines) - ALINORM 03/23; Appendix IV

BRAZIL

We suggest in all the tables have specified their origin sources

In English version must follow the rules of the language for example: “6,5” to correct to “6.5”

1- Title p.38 after sampling

To put underwritten asterisk in the word “sampling” and footnote: see item 1.4

1- Item 1.4 second para. first line p.38

To change “homogeneous good” to “homogeneous characteristic of goods and/or lot”

2- Footnote p. 42

To move it to item 1.5 after second para.

3- Item 2.1.2 p. 43 third para. 12th line

To take out the text in parenthesis to be coherent with second para in the item 2.2.2 p. 44

3- Item 2.1.2 p.43 third para 15th line

To take out the point between “sample” and “may”

4- Item 2.2.11 third para. p. 46

To change the text of class A to: Critical nonconformities can produce dangerous or unsafe conditions to whom utilize or maintain an unity of product or, can impede the performance of the important function of unity product.

To change the text of class B to: No critical nonconformities don't reduce the utility of product for purpose that it is intended for or don't change the effective use or operation.

5- Item 2.2.18 p. 49

To take out the point after LQ = 12,9 %) and put “where c = acceptance number

6- Item 2.3.3 7th para. p. 50

To put “considering the characteristic to be accessed” after heterogeneous

9- Item 2.4 first para. p. 51

To put footnote: Precision – the closeness of agreement between independent tests results obtained under stipulated conditions.

Accuracy – the closeness of agreement between a test result and accepted reference value.

10- General case p. 52

In the parenthesis to put “if” between e.g., and analytical

Clarification if there is difference between measurement error and analytical error

11- Conclusion p. 56

To change “table 3” to “table 4”

12- Item 2.5.1.3 second para., in first frame and second frame p.59

To review what the number is really right 36,9; 30 or 36,5 %

13- Item 2.6 first para. 4th line p. 63

To take out the point between “losses” and “for”

14- Item 2.6 second and fourth para. p. 63

Note of the consumers' risk (P_{10}) must be different of percentile

15- Table 9 third row p. 71

To go down P_{95}

16- p. 71

To put footnote to P_{95} as of the p. 78

17- Item 4.2.2 first para. p. 73

To correct "simple sampling plans" for "Single sampling plan by attribute"

18- Table 10 p. 74

To correct the title to "Single sampling plan by attribute"

19- Table 10 12th line first row p. 74

To correct "1320" to "3200"

20- Table 10 13th line first row p. 74

To correct "1321" to "3201"

21- Table 10 13th line third row p. 74

To correct "0" to "1"

22- Table 11 p. 75

To include "Example of" before "Probability" and to correct "attribute sampling plans" to "sampling plan by attribute"

23- Figure 6 p. 76

To correct "attribute sampling plans" to "sampling plan by attribute"

24- Table 12 p. 77

To correct "attribute sampling plans" to "sampling plan by attribute", to take out "AQL" =2,5 and to bold the values in fourth line relatives for 2,5 % defective rates in the lots

25- Table 13 p. 78

To take out "AQL = 6,5" to clarify about the values 50 % in third and fourth rows in seventh line

26- Item 4.2.2.4 p. 80

To correct all references "ISO 2859-1:1989" to "ISO 2859-1:1999".

27- Item 4.3.1.2 take out the brackets p.81.

28- Table 14 p. 82 replace the expression "Variable sampling plan" by "Sampling plan by variable"

29- Table 15 p. 83 take out from table the mention AQL = 0,65 %.

30- Table 15 p. 84 take out from table the mention AQL = 0,65 %.

31- Table 16 p. 86 take out from table the mention AQL = 0,65 %.

32- Table 16 p. 87 take out from table the mention AQL = 0,65 %.

33- Table 17 p. 90 replace the expression "Variable sampling plan" by "Sampling plan by variable".

34- Table 18 p. 91 take out from table the mention AQL = 0,65 %.

35- Table 18 p. 92 take out from table the mention AQL = 0,65 %.

36- Table 19 p. 94 take out from table the mention AQL = 2,5 %.

37- Table 19 p. 95 take out from table the mention AQL = 2,5 %.

UNITED STATES

The United States supports the adoption supports the adoption of the Proposed Draft General Guidelines on Sampling at Step 5 by the Commission (Ref. CL 2002/53-MAS, Items A5).

Measurement Uncertainty (Guidelines) - ALINORM 03/23; Appendix V

BRAZIL

“Brazil supports this document and proposes the changing of the nomenclature the measurement uncertainty to uncertainty of measurement to be consistent with the International Vocabulary on Metrology (VIM, 1995).”

Brazil proposes to change

“The following recommendations are made to governments” change to “the following recommendations are made to members countries.”

UNITED STATES

The United States supports the adoption supports the adoption of the the Proposed Draft Guidelines on Measurement Uncertainty, at Step 5 by the Commission (Ref. CL 2002/53-MAS, Items A6).

CODEX COMMITTEE ON MEAT AND POULTRY HYGIENE

Code of Hygienic Practice for Meat (Code of Practice) - ALINORM 03/16A; Appendix III

No comments received as at 30/05/2003

CODEX COMMITTEE ON PESTICIDE RESIDUES

Pesticides: Maximum Residue Limits (MRLs) - ALINORM 03/24A; Appendix V

No comments received as at 30/05/2003

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Veterinary Drugs: Maximum Residue Limits (MRLs) - ALINORM 03/31A; Appendix V

UNITED STATES

Cefuroxime – The U.S. supports the adoption of the temporary MRL for cefuroxime.

EUROPEAN COMMUNITY/ COMMUNAUTÉ EUROPEENE/ COMUNIDAD EUROPEA

ENGLISH

The European Community would like to make the following comments regarding acceptance of MRLs proposed at step 5 (appendix V):

The draft MRLs proposed for cefuroxime proposed at step 5 can be accepted, under the condition that the concerns expressed by the European Community in its previous comments are fully considered by JECFA. It should be underlined that the agreement to advance substance to step 5 does not mean that the European Community will agree to further advancement. Any such agreement would depend on the outcome of further evaluation and discussion by JECFA and CCRVDF on this substance. The European Agency for Evaluation of

Medicinal Products will submit the detailed scientific considerations on the evaluation of cefuroxime to the JECFA secretariat.

FRENCH

La Communauté européenne souhaite formuler les observations suivantes quant à l'acceptation des limites maximales de résidus (LMR) proposées respectivement à l'étape 5 (annexe V):

Les LMR pour la cyhalothrine proposées à l'étape 5 peuvent être acceptées à condition que le Comité mixte d'experts sur les additifs alimentaires (CMEAA) tienne pleinement compte des préoccupations exprimées par la Communauté européenne dans ses observations précédentes. Il conviendrait de souligner que l'accord visant à faire passer la substance à l'étape 5 n'implique pas que la Communauté européenne acceptera ultérieurement un tel passage. Cet accord dépendra des résultats des évaluations et discussions ultérieures menées par le CMEAA et le Comité du Codex Alimentarius sur les résidus de médicaments vétérinaires dans les aliments (CCRVDF) sur cette substance. L'Agence européenne pour l'évaluation des médicaments vétérinaires présentera des observations scientifiques détaillées sur l'évaluation de la céfuroxime au secrétariat du CMEAA.

SPANISH

La Comunidad Europea desea formular las observaciones siguientes respecto a la aceptación de los LMR propuestos en el trámite trámite 5 (apéndice V):

Los LMR propuestos para el cefuroxime en el trámite 5 son aceptables siempre que el JECFA tenga plenamente en cuenta las preocupaciones expresadas por la Comunidad Europea en sus observaciones anteriores. Cabe subrayar que la aprobación del paso de esta substancia al trámite 5 no significa que la Comunidad Europea vaya a aprobar tal paso. Tal aprobación dependerá de los resultados de nuevas evaluaciones y debates sobre esta substancia en el JECFA y el CCRVDF. La Agencia Europea para la Evaluación de Medicamentos presentará a la secretaría del JECFA una serie de consideraciones científicas sobre la evaluación del cefuroxime.