

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4(b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fiftieth Session

ALIGNMENT OF THE FOOD ADDITIVE PROVISIONS OF COMMODITY STANDARDS: REPORT OF THE EWG ON ALIGNMENT

Comments of Norway, Philippines and Thailand

Norway

We would like to comment upon agenda Item 4b on the agenda of CCFA 50th session 2018. Our comment relates to paragraph 13 and note 120 ((except for use in caviar at 2500 mg/kg).

The name “caviar”

We would like to underline that the Standard CX 291 – 2010 specifically explains the name of the standardized food to be “caviar” or “caviar completed with the usual name” (see below and the reference to section 7)). Therefore, in our understanding from discussions in the Committee on Fish and Fishery Products (CCFFP), the use of the term “caviar” is to be understood as products covered by this standard.

The Standard for Sturgeon Caviar (CODEX STAN 291-2010) applies to granular sturgeon caviar of the fish of the Acipenseridae family.

The name of the food is regulated in section 7 in the standard:

7.1 NAME OF THE FOOD

*7.1.1 For the Acipenseridae family, the name of the food shall be “caviar” or “caviar” completed with the usual name (Beluga for *Huso huso*, Ossetra for *Acipenser guldenstaedtii* and *Acipenser persicus*, Sevruga for *Acipenser stellatus*), in accordance with the law and custom of the country in which the product is sold, in a manner not to mislead the consumer.*

The use of note 120 and XS 291

As explained above, the term “caviar” is used for products under the standard. As the question relates to benzoate provisions for food category 09.3 and the alignment with CX 291 – 2010, we would like to suggest keeping the notes XS291 and 120 and amend the wording of note 120. Our proposal would be to change note 120 to “except for use in caviar substitutes at 2500 mg/kg”.

Reason;

The Food Category Hierarchy of FC 9.3 includes FC 9.3.3 “Salmon substitutes, caviar, and other fish roe products” and define both caviar and caviar substitute; the term “caviar” refers only to the roe of the sturgeon species (e.g. beluga). Caviar substitutes are made of roe of various sea and freshwater fish (e.g., cod and herring) that are salted, spiced, dyed and may be treated with a preservative.

Philippines

Appendix 2: Proposed Amendments to the Food Additive Provisions of the Codex Commodity

Standards for Fish and Fish Product Standards

Comments:

The Philippines supports proposed amendments to the food additive provisions of the codex commodity standards for fish and fish product standards:

Canned Salmon (CXS 3-1981);

Canned Shrimps or Prawns (CXS 37-1991);

Canned Tuna and Bonito (CXS 70-1981);
Canned Crab Meat (CXS 90-1981);
Canned Sardines and Sardine-Type Products (CXS 94-1981);
Canned Finfish (CXS 119-1981);
Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes (CXS 167-1989);
Dried Shark Fins (CXS 189-1993);
Crackers from Marine and Freshwater Fish,
Crustacean and Molluscan Shellfish (CXS 222-2001);
Boiled Dried Salted Anchovies (CXS 236-2003);
Salted Atlantic Herring and Salted Sprat (CXS 244-2004);
Sturgeon Caviar (CXS 291-2010); Fish Sauce (CXS 302-2011) and
Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish (CXS 311-2013).

Rationale:

The proposed amendments to include a general reference to the GSFA in Section 4 of the commodity standards for fish and fish products, recognizes the GSFA as the single reference point for food additives within CODEX.

ThailandSpecific comments:Appendix 2 and 3:

Thailand principally supports proposals of the eWG on the amendments to the food additive section of the 14 codex commodity standards for fish and fish products and the relevant provisions of the GSFA in food category 09.2, 09.2.5, 09.3, 09.3.3, 09.4 and 12.6 contained in Appendices 2, and 3 of CX/FA 18/50/6.

Appendix 4:

We support proposals of the eWG on the amendments to the food additive section of Standard for Certain Canned Fruits (CODEX STAN 319-2015) and the provisions of the GSFA in food category 04.1.2 "Processed fruit" and 04.1.2.4 "Canned or bottled (pasteurized) fruit" contained in Appendices 4 of CX/FA 18/50/6.

Appendix 5:

We do not oppose the proposal of eWG for the revised approach to listing corresponding commodity standards in Table 3 of GSFA.

Appendix 6:

Generally, Thailand supports the principle of "Guidance to Commodity Committee on the Alignment of Food Additive Provisions". We are of the opinion that this guidance would assist the commodity committees to undertake their work on alignment. The guidance also addresses the clear roles and responsibilities for commodity committees and CCFA which can improve the management of the alignment workload and accelerate the work on alignment.