

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8

CAC/40 CRD/06

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

40th Session

CICG, Geneva, Switzerland

17 - 22 July 2017

COMMENTS ON PROPOSALS FOR NEW WORK

(Comments of Nigeria, the Philippines, Tanzania and African Union)

Committee on Processed Fruits and Vegetables Comité sur les fruits et légumes traités Comité sobre Frutas y Hortalizas Elaboradas

Proposal for New Work on Standard for Cashew Kernels (CL 2017/07-PFV and CX/CAC
17/40/8 Add1 Annex I)

Comments of Nigeria

NIGERIA

Nigeria supports adoption of proposals from the CCPFV to commence new work on Standard for Cashew Kernel and Standard for Dried Sweet Potato.

Rationale: There is need to establish a worldwide quality standard for these commodities in order to protect health of consumers and prevent trade disputes.

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

Priority list of veterinary drugs requiring evaluation or re-evaluation by JECFA (REP17/RVDF
Paras 113 and 138, Appendix VI Part A)

Comments of the Philippines

PHILIPPINES

The Philippines supports the proposed Priority List of Veterinary Drugs for Evaluation or Re-Evaluation by JECFA with emphasis on Halquinol and Ethoxyquin.

1. Requesting the CCRVDF to include the veterinary drug product Halquinol 60% in the priority list of veterinary drugs requiring evaluation by JECFA. Attached is the completed Template for information necessary for prioritization by CCRVDF.
2. The Philippines through the Bureau of Animal Industry, Department of Agriculture was able to keep in touch with companies manufacturing Ethoxyquin but said companies failed to submit required information or packaged data. Henceforth, requesting the 23rd CCRVDF Session for the retention of Ethoxyquin in the priority list until such time that concerned companies complies with the requirements.

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

The project documents for new work (dehydrated ginger, dried garlic, dried chili peppers and paprika, basil, saffron, nutmeg and cloves) (REP17/SCH Para 82, Appendices V-XI)

Comments of Nigeria, Tanzania and the African Union

NIGERIA

Nigeria supports adoption of proposals from the CCSCCH to commence new work dehydrated ginger, dried garlic, dried chili peppers and paprika, basil, saffron, nutmeg and cloves.

Rationale: These spices are internationally traded hence there is need to establish an internationally harmonized commodity standards covering the safety, quality, hygiene and labeling in order to facilitate trade

TANZANIA

Development of Codex standards for dried or dehydrated ginger, dried garlic, chili peppers and paprika.

Position: Tanzania supports approval for new work on Codex standards for dried or dehydrated ginger, dried garlic, chili peppers and paprika as agreed and proposed by the delegations during the 3rd Session of the CCSCCH under the following leadership: Codex Standard for dried or dehydrated ginger (Chaired by Nigeria, co-chaired by India & Mali); Codex Standard for dried garlic (Chaired by Nigeria, co-chaired by India & Mali); and the Codex Standard for dried chili peppers and paprika (Chaired by India, co-chaired by Argentina).

Rationale: These spices are internationally traded hence need to establish internationally harmonized commodity standards covering the safety, quality, hygiene and labeling in order to facilitate trade.

AFRICAN UNION

BACKGROUND: The Codex Committee on Spices and Culinary Herbs (CCSCCH) is proposing the development of Codex Standard for dried or dehydrated ginger (Chaired by Nigeria, co-chaired by India & Mali); Codex Standard for dried garlic (Chaired by Nigeria, co-chaired by India & Mali); and the Codex Standard for dried chili peppers and paprika; (Chaired by India, co-chaired by Argentina). The respective project documents were accepted by delegations present at the 3rd Session of CCSCCH.

POSITION: African Union supports approval for new work on Codex standards for dried or dehydrated ginger, dried garlic, chili peppers and paprika.

RATIONALE: These spices are internationally traded hence there is need to establish an internationally harmonized commodity standards covering the safety, quality, hygiene and labeling in order to facilitate trade.

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

Revision of the *Standard for Named Vegetable Oils* (CODEX STAN 210-1999): Replacement of acid value with free fatty acids for virgin palm oil and inclusion of free fatty acids for crude palm kernel oil (REP17/FO Para 77, Appendix VIII)

Comments of the Philippines

PHILIPPINES

The Philippines, having read and perused the discussion paper prepared by Malaysia, fully supports the proposal as New Work.

Rationale:

The replacement of Acid Value with Free Fatty Acids for Virgin Palm Oils (and all supposedly Vegetable Virgin Oils) is more scientifically relevant. Proposed value for FFA content of virgin palm oils, expressed as palmitic acid and inclusion of acidity for crude palm kernel oils, expressed as FFA content expressed as lauric acid will be incorporated under the section Quality Characteristics in the Appendix of the Standard for Named Vegetable Oils (CODEX STAN 210-1999) and consequential changes to Section 5 on Method of Analysis and Sampling.

Revision of the *Standard for Olive Oils and Pomace Olive Oils* (CODEX STAN 33-1981) (REP17/FO Para 89, Appendix X)

*Comments of the Philippines***PHILIPPINES**

The Philippines supports the Conclusion and Recommendations of the e-Working Group on the Proposed draft revision to the Standard for olive Oils and Olive Pomace Oils (CODEX STAN 33-1981): Revision of the Limit for Campesterol, that is to continue with the discussion during the Committee Meeting to agree on the best option for the amendment to Section 3 of the Standard for Olive Oils and olive Pomace Oils (CODEX STAN 33-1981) and complete the work. The Philippines supports the recommendation as New Work.

Rationale:

The Philippines has been importing most of its olive oils from Spain. The cost of importing olive oil from Spain is about \$ 558.88/30kg (Philippine Bureau of Customs, 2014).

Also, the average composition of edible vegetable oil as to their fatty acids and other components is a reliable tool in fighting fraud and ensuring that every consumer gets the right requirements. The composition may sometimes vary with soil and climatic conditions plus the specific variety of plant. This is very especially true with olive oils and its authenticity is determined through its composition as campesterol and stigmasterol which would become its quality marker.

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

MLs for total aflatoxins and ochratoxin A in nutmeg, chili, paprika, ginger, pepper and turmeric
(REP17/CF Para 122, Appendix VII)

*Comments of Nigeria, Tanzania and the African Union***NIGERIA**

Nigeria support the proposal to commence new work on MLs for AFT and OTA in nutmeg, chilli and paprika, ginger, pepper and turmeric. However, different tolerance levels for aflatoxins and ochratoxin A in spices exist for many countries of the world and this could potentially impede international trade in spices. Even though development of Codex MLs for spices will ensure harmonization of diverse national legislation in different countries and therefore promote trade in spices, the Working Group should ensure that the MLs are been established, it should however be geographically representative.

TANZANIA

BACKGROUND: The CCCF11 agreed to start new work on MLs for AFT and OTA in nutmeg, chilli and paprika, ginger, pepper and turmeric.

Position: Tanzania supports the establishment of MLs for mycotoxins in spices.

Rationale: Development of Codex MLs for spices will ensure harmonization of diverse national legislation in different countries and therefore promote trade in spices. However, MLs established should be geographically representative.

AFRICAN UNION

BACKGROUND: The CCCF11 agreed to start new work on MLs for total aflatoxins (AFT) and ochratoxins A (OTA) in nutmeg, chilli and paprika, ginger, pepper and turmeric.

POSITION: African Union supports new work on development of MLs for mycotoxins in spices.

RATIONALE: Different tolerance levels for aflatoxins and ochratoxin A in spices exist for many countries of the world. This could potentially impede international trade in spices. Development of Codex MLs for spices will ensure harmonization of diverse national legislation in different countries and therefore promote trade in spices. MLs established should however be geographically representative.

MLs for methylmercury in fish species (REP17/CF Para 141, Appendix VIII)

Comments of Nigeria, Tanzania and the African Union

NIGERIA

In respect of the proposal to commence new work on MLs for fish (tuna, alfonso, kingfish/amberjack, marlin, shark, dogfish and swordfish, Nigeria will like to recommend to commission the need to conduct a trade impact assessment of this work and for JECFA to conduct exposure assessment of methylmercury in fish with occurrence data from Africa before MLs are established.

RATIONALE: Despite the fact that contamination of methylmercury in fish may have public health concerns, the potential trade and economic impacts that may be associated with the establishment of MLs have not been adequately articulated. In order for codex to achieve its dual mandate of protecting public health and promoting trade, Nigeria therefore call on the Commission to ensure that trade impact associated with the setting of ML for methylmercury in fish is assessed before the standard is established.

TANZANIA

BACKGROUND: This work aims to establish Maximum Levels (MLs) for methyl mercury in fish, including associated sampling plans. The current MLs for methyl mercury in fish (1 mg/kg for predatory fish and 0.5 mg/kg for other fish species) were adopted in 1991. In 2003, the Joint FAO/WHO Expert Committee on Food Additives (JECFA) revised the provisional tolerable weekly intake (PTWI) for methyl mercury to 1.6 µg/kg body weight from 3.3 µg/kg body weight, based on the most sensitive toxicological end-point (developmental neurotoxicity) in the most susceptible species (humans). The Codex Committee on Contaminants in Foods therefore intends to start new work on MLs for fish (tuna, alfonso, kingfish/amberjack, marlin, shark, dogfish and swordfish.

Position: Tanzania wish to reiterate comments made during the 11th Session of the Codex Committee on Contaminants in Foods on the need to conduct a trade impact assessment and for JECFA to conduct exposure assessment of methylmercury in fish with occurrence data from Africa before MLs are established.

Rationale: Whilst noting that contamination of methylmercury in fish may have public health concerns, the potential trade and economic impacts that may be associated with the establishment of MLs have not been adequately articulated. In fulfilment of its dual mandate of protecting public health and promoting trade, we call on the Commission to ensure that trade impact associated with the setting of ML for methylmercury in fish is assessed before the standard is established.

AFRICAN UNION

BACKGROUND: This work aims to establish Maximum Levels (MLs) for methylmercury in fish, including associated sampling plans. The current GLs for methylmercury in fish (1 mg/kg for predatory fish and 0.5 mg/kg for other fish species) were adopted in 1991. In 2003, the Joint FAO/WHO Expert Committee on Food Additives (JECFA) revised the provisional tolerable weekly intake (PTWI) for methylmercury to 1.6 µg/kg body weight from 3.3 µg/kg body weight, based on the most sensitive toxicological end-point (developmental neurotoxicity) in the most susceptible species (humans). The Codex Committee on Contaminants in Foods therefore intends to start new work on MLs for fish (tuna, alfonso, kingfish/amberjack, marlin, shark, dogfish and swordfish

POSITION: African Union wishes to reiterate our comments made during the 11th Session of the Codex Committee on Contaminants in Foods on the need to conduct a trade impact assessment and for JECFA to conduct exposure assessment of methylmercury in fish with occurrence data from Africa before MLs are established.

RATIONALE: Whilst noting the public health concerns associated with contaminations of methylmercury in fish is well documented, the potential trade and economic impacts that may be associated with the establishment of MLs have not been adequately articulated. In fulfilment of its dual mandate of protecting public health and promoting trade, African Union request the Commission to ensure that trade impact associated with the setting of ML for methylmercury in fish is assessed before the standard is established.

Revision of the *Code of Practice for the Prevention and Reduction of Dioxin and Dioxin-like PCB Contamination in Foods and Feeds* (CAC/RCP 62 – 2006) (REP17/CF Para 146, Appendix IX)

Comments of Tanzania and the African Union

TANZANIA

Background: The purpose of the proposed new work is to provide to member countries and the food and feed producing industry, guidance to prevent and reduce non dioxin-like (NDL) polychlorinated biphenyl (PCB) contamination in food and feed.

Position: Tanzania supports approval for revision of the Code of Practice for the Prevention and Reduction of Dioxin and Dioxin-like PCB Contamination in Food and Feeds (CAC/RCP 62-2006) to include non-dioxin-like PCBs (NDL-PCBs) in its scope as new work for approval by CCEXEC/CAC.

Rationale: The revision aims at preventing dietary exposure to NDL-PCBs, by limiting contamination of the food-chain, including exposure of food-producing animals to PCBs. Polychlorinated biphenyls (PCBs) are widespread persistent environmental pollutants. They belong to the class of Persistent Organic Pollutants (POPs) due to their long-term survival in the environment and have a wide range of adverse health effects including endocrine disruption, dermal toxicity and chloracne, and neurocognitive development problems in children. They are classified as human carcinogens (Group 1) by International Agency for Research on Cancer (IARC). Other than occupational exposure, exposure is mainly via food (90%), especially meat, dairy, fish and shellfish where they accumulate in the lipid components. Cereals, fruits and vegetables contain only low levels, whereas infants are exposed via breast milk.

AFRICAN UNION

BACKGROUND: The purpose of the proposed revision is to widen the scope of CAC/RCP 62-2006) to include guidance for the prevention and control of non-dioxin like (NDL) polychlorinated biphenyl (PCB) contamination in food and feed.

POSITION: African Union supports approval for the revision of the Code of Practice for the Prevention and Reduction of Dioxin and Dioxin-like PCB Contamination in Food and Feeds (CAC/RCP 62-2006) to include non-dioxin-like PCBs (NDL-PCBs) in its scope as new work for approval by CCEXEC/CAC.

RATIONALE: The revision aims at preventing dietary exposure to NDL-PCBs, by limiting contamination of the food-chain, including exposure of food-producing animals to PCBs. Polychlorinated biphenyls (PCBs) are widespread persistent environmental pollutants. They belong to the class of Persistent Organic Pollutants (POPs) due to their long-term survival in the environment and have a wide range of adverse health effects including endocrine disruption, dermal toxicity and chloracne, and neurocognitive development problems in children. They are classified as human carcinogens (Group 1) by International Agency for Research on Cancer (IARC). Other than occupational exposure, exposure is mainly via food (90%), especially meat, dairy, fish and shellfish where they accumulate in the lipid components. Cereals, fruits and vegetables contain only low levels, whereas infants are exposed via breast milk.

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

Guidance on the use of systems equivalence (REP17/FICS Para 47, Appendix III)

Comments of Tanzania and the African Union

TANZANIA

BACKGROUND: The proposed guidance will complement the guidance in the three CCFICS texts that make reference to equivalence, that is:

- i. Principles and Guidelines for the Exchange of Information between Importing and Exporting Countries to Support the Trade in Food (CAC/GL 89-2016)
- ii. Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems (CAC/GL 26-1997) and the
- iii. Guidelines on the Judgement of Equivalence of Sanitary Measures associated with Food Inspection and Certification Systems (CAC/GL 53-2003).

Although three Codex texts make reference to equivalence, these documents do not focus on guidance on processes and procedures that could assist countries in approaching systems equivalence.

Position: Tanzania supports the approval of this Proposed Guidance on the Use of Systems Equivalence.

Rationale: This Codex standard will provide guidance to competent authorities of importing and exporting countries on the use of systems equivalence recognition as a means to further facilitate protection of the health of consumers and ensuring fair practices in the food trade.

AFRICAN UNION

BACKGROUND: The proposed guidance complements the already existing CCFICS guidance that make reference to equivalence, that is:

- Principles and Guidelines for the Exchange of Information between Importing and Exporting Countries to Support the Trade in Food (CAC/GL 89-2016)
- Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems (CAC/GL 26-1997) and the
- Guidelines on the Judgement of Equivalence of Sanitary Measures associated with Food Inspection and Certification Systems (CAC/GL 53-2003).

Although three Codex text make reference to equivalence, these documents do not focus on guidance on processes and procedures that could assist countries in approaching systems equivalence.

POSITION: African Union supports the approval of this proposal for new work on Proposed Guidance on the Use of Systems Equivalence.

RATIONALE: The new Codex standard to be developed will provide guidance to competent authorities of importing and exporting countries on the use of systems equivalence recognition as a means to further facilitate protection of the health of consumers and ensuring fair practices in the food trade.

Guidance on paperless use of electronic certificates (Revision of *Guidelines for Design, Production, Issuance and Use of Generic Official Certificates*) (REP17/FICS Para 53, Appendix IV)

Comments of Tanzania and the African Union

TANZANIA

BACKGROUND: The purpose and scope of the work is to develop a framework with guidance to assist the competent authority (ies) to develop and implement paperless electronic certification exchanges in food. It is expected that such harmonized guidance would allow broader participation, promote consistency, and simplify the development process for countries developing electronic certification solutions.

Position: Tanzania supports the move to e-certificates while looking for flexibility with the use of paper certificates which is still the predominant form of certification in most National Food Control Systems.

Rationale: Member States are at different levels of technological capabilities, resource needs, and different levels of implementation of paperless certification.

Moreover, as far as practicable, any Codex guidance on e-certification should be harmonized with existing e-certification models or concepts from other international standards setting organizations such as the IPPC and OIE in order to facilitate trade.

AFRICAN UNION

BACKGROUND: The purpose and scope of the work is to develop a framework with guidance to assist competent authority (ies) to develop and implement paperless electronic certification exchanges in during food control. It is expected that such harmonized guidance will promote consistency and simplify the development process for countries developing electronic certification solutions.

POSITION AND RATIONALE: We note that paper certificate is still the predominant form of certification in most National Food Control Systems although the use of e-certification is gaining momentum. Recognizing that countries are at different levels of technological capabilities, resource needs, and different levels of implementation of paperless certification, there is need to ensure flexibility with the use of both paper certificates and e-certificates. Moreover, as far as practicable, any Codex guidance on e-certification should be harmonized with existing e-certification models or concepts from other international standard setting organizations such as the IPPC and OIE in order to facilitate trade.

Guidance on regulatory approaches to third party assurance schemes in food safety and fair practices in the food trade (REP17/FICS Para 62, Appendix V)

Comments of Nigeria, Tanzania and the African Union

NIGERIA

As regards CCFICS proposed new work on Guidance on regulatory approaches to third party assurance schemes in food safety and fair practices in the food trade, Nigeria noted that there is an existing International Organization for Standardization (ISO) standards on third party schemes that are currently being implemented in several countries.

Even though Nigeria does not object to the approval of this new work, it is a bit concerned on possible duplication of standards on this subject area. Proliferation of third party assurance schemes is trade limiting and has negative economic impact especially on exporting developing countries.

TANZANIA

BACKGROUND: The purpose of this new work is to provide Codex members with guidance on the assessment and use of third party assurance schemes by competent authorities with the objective of promoting a harmonized and robust approach in countries' consideration of third party assurance schemes. This is expected to enhance countries' regulatory arrangements and delivery of official controls within the national food control system (NFCS).

Position: Tanzania supports the approval of new work on Regulatory Approaches to Third Party Assurance Schemes in Food Safety and Fair Practices in Trade provided that the scope does not duplicate what has already been undertaken by other international standards setting bodies.

Rationale: The International Organization for Standardization (ISO) has already developed standards on third party schemes that are currently being implemented in several countries. Therefore, care needs to be taken to avoid duplication of standards on this subject area.

Proliferation of third party assurance schemes is trade limiting and has negative economic impact especially on exporting developing countries.

AFRICAN UNION

BACKGROUND: The purpose of this new work is to provide Codex members with guidance on the assessment and use of third party assurance schemes by competent authorities with the objective of promoting a harmonized and robust approach in countries' consideration of third party assurance schemes. This is expected to enhance countries' regulatory arrangements and delivery of official controls within the national food control system (NFCS).

POSITION AND RATIONALE: African Union notes that the International Organization for Standardization (ISO) has already developed standards on third party schemes that are currently being implemented in several countries. Whilst we do not object to the approval of new work on Regulatory Approaches to Third Party Assurance Schemes in Food Safety and Fair Practices in Trade, we are concerned that there is the potential for duplication of standards in this subject area. Proliferation of third party assurance schemes is trade limiting and has negative economic impact especially on exporting developing countries.

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

Establishment of Codex Schedules and Priority List of Pesticides

Comments of Tanzania and the African Union

TANZANIA

Background: The committee agreed to forward the proposed Schedule of Priority Pesticide for evaluation by JMPR to CAC40 for adoption as follows:

1) **New Compounds for Evaluations (10)**

Chlorfenapyr, Ethiprole, Pyrifluquinazon, XDE-777, Norflurazon, Pydiflumetofen, Tioxazafen and its metabolite benzamidine, Fluazinam, Pyriofenone (R) and Mandestrobin (R)

2) **New Uses and Other Evaluations (20)**

Cyantraniliprole, Isoxaflutole, Cyazofamid, Abamectin, Fludioxonil, Lufenuron, Metalaxyl-M, Diquat, Oxathiapiprole, Pyraclostrobin, Isofetamid, Mandipropamid, Profenofos, Fluxapyroxad, Bentazone, Propamocarb, Spiromesifen, Lambda-cyhalothrin, Pyriproxyfen and Sulfoxaflor

3) **Periodic Review (6)**

Imazalil, Flumethrin, Metalaxyl, Clethodim, Kresoxim-methyl and Bromopropylate

Position: Tanzania recommends the adoption of the proposed Schedule of Priority Pesticide for evaluation by JMPR by CAC40.

Rationale: This list of pesticides will be evaluated by the JMPR to establish MRLs for public health protection and to facilitate trade.

AFRICAN UNION

BACKGROUND: CCPR49 (2017) agreed to forward the proposed Schedule of Priority Pesticide for evaluation by JMPR to CAC 50 for approval. The schedule includes new compound evaluations, new uses and periodic review of existing compounds as follows:

NEW COMPOUND EVALUATIONS (10)

Chlorfenapyr, Ethiprole, Pyrifluquinazon, XDE-777, Norflurazon, Pydiflumetofen, Tioxazafen and its metabolite benzamidine, Fluazinam, Pyriofenone (R) and Mandestrobin (R)

NEW USES AND OTHER EVALUATIONS (20)

Cyantraniliprole, Isoxaflutole, Cyazofamid, Abamectin, Fludioxonil, Lufenuron, Metalaxyl-M, Diquat, Oxathiapiprole, Pyraclostrobin, Isofetamid, Mandipropamid, Profenofos, Fluxapyroxad, Bentazone, Propamocarb, Spiromesifen, Lambda-cyhalothrin, Pyriproxyfen and Sulfoxaflor

PERIODIC REVIEW (6)

Imazalil, Flumethrin, Metalaxyl, Clethodim, Kresoxim-methyl and Bromopropylate

POSITION: African Union supports adoption of the proposed Schedule of Priority Pesticide for evaluation by JMPR by CAC 40.

RATIONALE: This list of pesticides will be evaluated by the JMPR to establish MRLs for public health protection and to facilitate trade.