

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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CODEX ALIMENTARIUS COMMISSION

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

(Comments¹ submitted by 23 June 2017)

Committee on Processed Fruits and Vegetables

Comité sur les fruits et légumes traités

Comité sobre Frutas y Hortalizas Elaboradas

Annex on Canned Pineapples (for inclusion in the Standard for Certain Canned Fruits
(CODEX STAN 319-2015) (REP 17/PFV Para 26, Appendix II)

Comments of Philippines

PHILIPPINES

The Philippines supports the proposed draft Standard for Canned Pineapples that is Annex to Codex Standard for Certain Canned Fruits to the Commission for adoption at Step 5/8.

The Philippines would like to extend its appreciation to the Electronic Working Group led by Thailand and Co-chaired by the EU for the revision / preparation of this 2ND Revised Draft Annex on Canned Pineapples (Draft Standard for Certain Canned Fruits) and taking into consideration this Philippine Position.

The Philippines is in favor for the deletion of the term "Dessert bit" in the whole draft, that is supposedly intended to refer to Tidbits characteristics, "dessert bit" is not commonly used as a pineapple style whether cored or uncored.

Specific Comments:

1. Section 2.2.2.1 Cored Pineapples (f) Cubes or diced

The Philippine supports Option 1 under Section 2.2.2.1 Cored Pineapples (f) Cubes or diced.

Option 1: (a) not more than 10% of the drained weight of pineapple in the container may consist of units of such size that they will pass through a screen that has square openings of 8 mm;

(b) not more than 15% of the drained weight of pineapple in the container may consist of pieces which weight more than 3 g each.]

Rationale:

This is the current practice/ applied by the canned pineapple industry to maintain the pack quality of cubed pineapples.

2. Defects

The Philippines support with the new proposal by Thailand and the US to improve text as "12.5% by total number of units over 32 per can".

3. Section 3 Food Additives

The Philippine supports Option 2.

¹ This document compiles comments which were submitted through the email system.

Option 2:

3.1 Acidity regulator

Only the acidity regulator listed below is permitted for use in canned pineapples.

INS No.: 330

Name of the Food Additive: Citric acid

Max. Level: GMP

3.2 Antifoaming Agent

Only the antifoaming agent listed below is permitted for use in canned pineapples.

INS No.: 900a

Name of the Food Additive: Dimethylpolysiloxane

Max. Level: 10mg/kg

3.3 Antioxidant

Only the antioxidant listed below is permitted for use in canned pineapples.

INS No.: 300

Name of the Food Additive: Ascorbic acid, L-

Max. Level: GMP

Rationale:

These are the only acidity regulator, antifoaming agent, and antioxidant, and their maximum levels, currently being used by the canned pineapple industry, respectively.

3.4. The Philippine position with regards to its concern for the inclusion of Sweeteners as an allowed food additive for canned P/A stays.

- Sweeteners primarily function as it is in this product as a SWEETENER over and more than that as to reduce energy or sugar
- The application of the sweetener is specifically for canned pineapple in light or extra light syrup (which still meet the packing media requirement for canned fruits) and still being a regular product; to compensate for the lack of sweetness in light syrup while at the same time retaining the °Bx requirement of 10 to 14 in a light syrup, for example.
- With regards to health and safety of consumer, this is not compromised since sweeteners are as listed with its max levels in the GSFA
- On the overall, exclusion of sweeteners in the standard would be trade problem on the acceptance of products with sweeteners despite of it having met the quality criteria established in this Draft Standard; and
- With the proposed revision of the General Standard for Canned Fruits as follows:

This Standard does not apply to:

1. products which are clearly intended or labelled as intended for special dietary use;
2. reduced sugar products or those with a very low sugar content;
3. products where the foodstuffs with sweetening properties have been replaced wholly or partially by food additive sweeteners.

This would mean that products with added sweeteners may not be required to comply with the minimum criteria in Weights and Measures in Section 4 of the Standard, specific to the drained weight.

Such that, with the light syrup and in regular pack, for example, current industry practice would add more pineapples in a product to meet the % Minimum drained weight requirement in Section 4.2. Thus, exclusion for this regular product with sweetener from the standard as proposed would free the industry to comply with the drained weight requirement which would be detrimental to the consumers.

As previously raised, we are revising and updating the old Canned Pineapple standard to accommodate current industry practice and improvements since the 1980s standard, and that these should be reflected in this new proposed standard.

To align with the General Provisions on the Standard for Canned Pineapples, Section 4.1, that states that “only food additives listed in this Standard and its Annexes are allowed....”

Thus, Section 3.4 should be included as read:

“Sweeteners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives* (CODEX STAN 192-1995) in Food Category 04.1.2.4 (Canned or bottled (pasteurized) fruit) or listed in Table 3 of the General Standard are acceptable for use for foods conforming to this Annex.” ~~The use of sweeteners should be limited to energy reduced or no-added sugar products.~~

**Coordinating Committee for Asia
Comité FAO/OMS de coordination pour l'Asie
Comité Coordinador FAO/OMS para Asia**

Proposed Draft Regional Code of Hygienic Practice for Street-Vended Food in Asia,
(REP 17/ASIA Para 98 Appendix V)

Comments of Philippines

PHILIPPINES

Philippines supports the adoption at Step 5/8 of Proposed Regional Code of Hygienic Practice for Street-Vended Foods in Asia, having been part of the physical working group and major Philippine comments accepted by CCASIA

For the record, the Specific Comments during 2016 CCASIA 2016 are as follows:

Specific Comments

1. Section 2

2.1 Scope

4. This Code defines the general hygienic practices required to be followed to make the street foods safe. It ~~will~~ covers the food preparation/handling/display/serving/storage; location and facility (design, structure); equipment and appliances; maintenance and sanitation; education and training as well as be useful for all the responsibilities of the three major stakeholders (Vendors/ cooks/ other food handlers, consumers and the relevant authorities) in managing/handling street-vended foods to ensure food hygiene. who need to be involved to make street foods hygienic.

Rationale:

The provision in Section 2.1 is on scope or coverage/extent of the Code rather than the usefulness of the Code. The scope covers 1) practices; 2) location and facility (design, structure); 3) equipment and appliances; 3) maintenance and sanitation; 4) education and training; and 5) stakeholders responsibilities. “Useful” concern may be more suitable under the succeeding item i.e. 2.2 Use

2.2 Use

Philippine Position (under 2.2) was accepted by CCASIA as follows:

1. Changed the phrase “has been prepared” to “is intended”
2. The word “beverages” was remove having been covered in STAN 1-19851

Rationale:

“intended for use” may be more meaningful over “prepared for use” as the latter phrase even without mentioning in the text is an inherent part of actions in crafting the Code. Likewise, ensure and maintain are preferred over “improve” to emphasize the deeper purpose of the Code and to qualify the desired outcome.

Further, the word “beverages” may not need to mention for two (2) reasons: 1. For consistency with the title of this Code; and 2. It is part of “food” as defined in the codex standard (CODEX STAN 1-19851, General Standard for the Labelling of Prepackaged Foods) to wit: “Food” means any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drinks, chewing gum and any substance which has been used in the manufacture, preparation or treatment of “food” but does not include cosmetics or tobacco or substances used only as drugs.) Reference: CODEX STAN 1-19851, General Standard for the Labelling of Prepackaged Foods.

2.3 Definitions

Philippine Position (under 2.3) was accepted by CCASIA.

The words “Plastic jars” were added as part of food grade containers.

For the purposes of this Code of Hygienic Practice, the terms used herein have the following definitions:

- Sealed Container ²

Food grade containers such as:

- Hermetically sealed containers;
- Sealed jars, with anchor and crown type closures;
- Milk bottles sealed with aluminium caps;
- Glass jars and bottles with screw caps; and
- Cans and suitable racks or cases should be provided for multi-use containers or bottles with seals.

Rationale: Plastic bottles and paper cups etc. are being used in local areas.

2. Section 4 STAKE HOLDERS IN STREET FOOD VENDING

4.1 Street Food Vendor

Philippine Position under 4.1 was accepted changing the word “visiting” to “using” the toilets

10. Every street food vendor, during conduct of business should observe the following:

- Hygienic behaviour: Eating, strenuous talking with uncovered mouth in front of food, chewing, smoking and nose blowing should be avoided while handling food. Refrain from any unhygienic practices such as spitting, cleaning nose, ears or any other body orifice, touching any body part, touching mobile phone, currency etc. while handling food. Should not sneeze or cough over or onto the food. Should wash hands thoroughly with soap and clean water before and after handling food, after ~~visiting~~ using the toilets, after activity like sneezing, touching any surface
- Health of the street food vendors: Any street food vendor, assistant or food handler, showing any of the following symptoms: jaundice, diarrhoea, vomiting, fever, sore throat with fever, discharge from ear, frequent and rapid coughing with or without fever, eye and nose, visibly infected lesions (boils, cuts, etc.) should not be involved in any food handling activity.

Rationale:

Strenuous talking with uncovered mouth in front of food (Under Hygienic behavior) may drizzle saliva causing biological hazards while rapid frequent coughing may be a sign of unhealthy condition (Under Health of the street food vendors). In several definitions, word “using” involves touching parts of the toilet while “visiting” may not.

4.3 Authorities

17. The authorities should :

- Be ~~aware~~ knowledgeable of food safety regulations.

Rationale:

Difference of knowledge and awareness: Knowledge is acquisition of facts. Awareness is being informed. The word “knowledgeable” incorporates deeper understanding of food safety. Continuous update/gaining facts is important to keep abreast on latest development for effective monitoring

3. Section 6 MAINTENANCE AND SANITATION

6.2 Water Supply and Quality

Vendors should have access to clean water. Local body/municipality should provide clean source of water and hand washing facility accessible to vendors

Rationale:

This is within the territorial jurisdiction of municipality.

4. Section 8 FOOD PREPARATION, HANDLING, DISPLAY AND STORAGE

8.1 Raw Materials/Ingredients and Packaging

40. Transportation, storage of food should be carried out in a hygienic manner and preferably should be consumed within specified shelf-life.

Rationale:

The word “preferably” is suggested to be deleted as it opens for options. To ensure food safety, a single choice is suggested i.e. stick to the stability study/shelf-life of the food.

8.2. Preparation/ Cooking

Philippine Position was accepted (under 8.2) adding the improved phrase “If this is not possible, knives and cutting boards should be washed after every use”

45. To avoid cross-contamination, raw and cooked food should be handled separately.

For this, separate sets of knives and cutting boards (which are coded for identity) should be used, otherwise, the knives and cutting boards should be washed and cleaned after every use.

Rationale:

There may be cases when separate kitchen devices are inadequate

48. Avoid reused, use of reused and recycled of cooking oil. ~~It is ideal to use oil once only, if possible~~

Rationale:

Both reused and recycled may affect the fatty acid composition and may open for onset of free radicals

Philippine Position was accepted by CCASIA adding the phrase “Keep hot foods hot and cold foods cold”

49. Where a food is to be served hot, it should be maintained at a temperature above 60°C. Keep hot foods hot and cold foods cold.

Rationale:

Basic principles of food safety

51. All perishable food not ~~se~~ sold within 2 hours⁷ should be thoroughly heated before serving. However, unsold food beyond 4 hours⁷ should be disposed of.

Rationale:

Word editorial

8.3 Handling and Storage

57. Leftovers and unsold perishable food should be disposed of hygienically and not used or recycled or resold (Rationale: so as not to compromise food safety)

59. Seasoning and sauce should be stored at ~~appropriate~~ refrigerated temperature

Rationale:

For clarity, needs to be very specific in storage condition

62. Fuel, detergents, soap etc. should be stored in dedicated containers away from the food handling zone. After handling such these items, hands should be thoroughly washed before handling food.

Rationale:

Transfer item 63 in item 62 as they are connected with each other

5. Section 9 EDUCATION AND TRAINING

64. Every street food vendor, helper, cook or food handler shall undergo basic food hygiene training. Viewed from a general perspective, most foodborne hazards may be prevented by thorough cooking, hot handling, rapid cooling, cold storage, avoidance of cross-contamination or combination of these. Training is to be conducted by the relevant authority or other institutions recognized or ~~approved~~ accredited by the relevant authorities. Street Food Vendors should also be made aware of their responsibility to consumers.

Rationale:

The use of “accredited” over “approved” accompanied by a set of guidelines/criteria to be crafted locally by national authorities is preferred in consideration of equivalence to safety standards among countries

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 Philippines

PHILIPPINES

The Philippines support for the advancement of the proposed draft MRLs for Ivermectin (Cattle Fat, Kidney, Liver, Muscle) to Step 5/8 as recommended by JECFA's new assessment (81st JECFA).

Cattle fat	400 µg/kg
Kidney	100 µg/kg
Liver	800 µg/kg
Muscle	30 µg/kg

The Philippines support for the advancement of the proposed draft MRLs for Lasalocid Sodium in (Chicken, Turkey, Quail, and Pheasant Kidney, Liver, Muscle, Skin + Fat) to Step5/8 as recommended by 78th JECFA:

Species	Skin + fat (µg/kg)	Kidney (µg/kg)	Liver (µg/kg)	Muscle (µg/kg)
Chicken	600	600	1200	400
Turkey	600	600	1200	400
Quail	600	600	1200	400
Pheasant	600	600	1200	400

Rationale:

JECFA evaluation justifies the establishment of MRLs for which newer studies were accounted and considered to be informative for the evaluation of ivermectin and lasalocid sodium.

The Philippines supports the advancement of the proposed draft MRLs (78thJECFA) for Lasalocid sodium at Step 5/8 with the following justifications:

1. Since 2005, Lasalocid sodium has been a duly registered in-feed anti-coccidial in the Philippines through the Bureau of Animal Industry with 7 days withdrawal period (WDP). Lasalocid sodium is also registered elsewhere in over 50 countries.
2. Being a coccidiocidal (vs. a coccidiostat) antiparasitic agent, and being the only divalent polyether ionophore, it had been relied upon by veterinarians for the effective poultry health management programs vs. coccidiosis, particularly without having any concern of incompatibility with tiamulin, another widely used anti-mycoplasmal drug for poultry.
3. Complementing the drug's efficacy and compatibility with other widely-used medicaments in poultry, is its wide margin of safety, with studies and in-field experience showing that Lasalocid is non-toxic, producing no adverse effects in poultry when used as directed.
4. Lasalocid produces no violative residues in meat when used as directed.

The Philippines supports for the advancement of the proposed draft MRLs (81st JECFA) for Ivermectin at Step 5/8. Ivermectin residues have no adverse effects in humans.

**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 Philippines, Singapore

PHILIPPINES

General Comments

The Philippines supports the proposed draft Revision of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) to the Commission for adoption at Step 5/8. As member of the EWG, majority of the Philippine comments were accepted by the CCFH.

The Philippines supports the recommendation of the EWG on the following:

1. Avoid duplication or repetition of paragraphs or provisions with those found in the specific Annexes or in other Codex guidelines such as on antimicrobial resistance;
2. Ensure consistency with the General Principles of Food Hygiene;
3. Request for scientific advice from FAO/WHO on the quality of water for different uses (i.e. clean water, potable water); and
4. Non-inclusion of Annexes on carrots, tomatoes, and hydroponics in the draft, since this will require further discussions with the Committee as possible new work proposals.

Specific Comments:

Annex I, page 22, Title of the Document

Philippine position not carried in the Title of the document but was instead carried in the Introduction as indicated in paragraph 1.

Rationale:

1. Inclusion of "(RTE)" after "Ready-to-Eat". In food technology and food service, RTE is an acceptable acronym for "ready-to-eat".
2. Annex I, page 22, Introduction, paragraphs 2 and 3

Para 2 and 3 are the same paragraphs, the Philippines proposed to delete para 3. Philippine position was carried.

3. Annex I, page 22, Scope, paragraph 7, last sentence

Philippine position was carried as indicated in Scope, paragraph 6.

Rationale:

For consistency.

4. Annex I, page 23, Section 2.3 Definitions

The Philippine position was not carried as paragraph 17 was on control of certain pathogens which may be a concern in relation to RTE, fresh, pre-cut low acid fruits and vegetables packaged in a modified atmosphere, and not MAP per se.

Rationale:

The term was mentioned in paragraph 17 and should be clearly defined.

5. Annex I, page 23, Section 4, Heading

The Philippine position was carried. However, the Committee later on decided to delete the word "packing" in the section headings on Establishment as control should not be limited to the "packing establishment" only but in all facilities of the establishment.

Rationale:

For consistency with other part of the document.

6. Annex I, page 23, 4.4.2 Drainage and waste disposal, paragraph 14

The Philippine position was carried.

7. Annex II, page 29

The Philippine position was carried.

8. Annex II, page 29

The Philippine position was carried. However, the Committee later on decided to delete Section 5.5.1.2, Initial Rinse, paragraphs 39 and 40 as details in said paragraphs should be covered by GHP.

SINGAPORE

Singapore thanks the Committee for the revision of the Code of Hygienic Practices for Fresh Fruits and Vegetables. Singapore supports the adoption of the proposed draft, as the revised Code would provide a level playing field for hygienic practices to be adopted.

**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**

Editorial amendments to various CCNFSDU standards: flavourings, i.e. Standards for Canned Baby Foods (CODEX STAN 73-1981), Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74- 1981), Follow-up formula (CODEX STAN 156- 1987), and Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CAC/GL 8- 1991)

Comments of Philippines

PHILIPPINES

The Philippines supports the proposed editorial amendments to various CCNFSDU standards: flavourings Standards for Canned Baby Foods (CODEX STAN 73-1981), Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74- 1981), Follow-up formula (CODEX STAN 156- 1987), and Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CAC/GL 8- 1991).

Rationale:

The use of the term “Flavourings” is consistent with the use of JECFA and other internationally recognized authoritative scientific bodies and internationally recognized dictionaries.

Draft and Proposed NRV—R for vitamins D and E and the conversion factors for vitamin E equivalents for labelling purposes in the Guidelines on Nutrition Labelling (REP 17/NFSDU Para 26, 28 and 36 Appendix III)

Comments of Malaysia, Philippines, Singapore

MALAYSIA

Malaysia does not support the adoption of the 1 mg α -tocopherol (1mg RRR- α -tocopherol) as the dietary equivalent for vitamin E at Step 5/8. Malaysia and Indonesia have recorded reservation to the above decision at the last CCFNSDU38.

Malaysia would like to reiterate our positions at previous meetings, namely CCFNSDU37, CAC39, and CCFNSDU38 that Malaysia strongly objects to recognising α -tocopherol as the only form of vitamin E when establishing the NRV-R for vitamin E. Malaysia does not have the intention to open up a technical discussion on this matter in this session but seeks an opportunity to allow for another round of discussion considering the evidence on vitamin E provided by Malaysia.

At the last CCFNSDU38, Malaysia had presented CRD 6 (1) during Agenda Item 4 which provided a comprehensive justification and evidence that clarifies that other forms of vitamin E besides α -tocopherol do exhibit vitamin E activities for the Committee's consideration. Unfortunately this was not fully considered.

Therefore, having to proceed with the adoption of only alpha-tocopherol as the contributor of vitamin E activity especially as the dietary equivalent of vitamin E, would unjustifiably disregard the valuable contributions of other isomers of vitamin E.

Moreover, the global market of natural sources of vitamin E is segmented into three product types – tocopherols, tocotrienols and others. The market is classified into five regions - North America, Europe, Asia Pacific, Middle East and Africa, and Latin America. Tocotrienols are already used heavily in Asia Pacific, where it has become part of the diet. Other regions are quickly noticing the benefits of including tocotrienols as a part of the diet as well (2).

According to the Grand View Research, the international market for tocotrienol is expected to reach USD 387.6 million by 2024. The global tocotrienol market demand is projected to reach 986.9 kilo tons by 2024, growing at a CAGR of 7.2% from 2016 to 2024. The market of tocotrienols is growing in the pharmaceutical industry owing to their properties as antioxidants such as anti-cancer, lowering cholesterols and lowering triglyceride (3, 4). Foods containing tocotrienols include rice bran oil, wheat germ oil and palm oil.

In view of this, the adoption of the draft standard in its current text will have a huge economic implications to the countries already producing the tocotrienols as isomers of vitamin E as it will affect the global trade of these products already in the market. On these grounds, Malaysia urges the Commission to adopt the current document on conversion factor and Nutrient reference value at Step 5 only to allow for another round of discussion at the next Session of the CCFNSDU on the technical aspects of the different isomers of vitamin E considering the evidence as provided by Malaysia especially to ensure that the activities of other isomers of vitamin E besides α -tocopherol are not ignored and be given its due recognition.

Consequently Malaysia does not support the adoption of 9mg/d of alpha-tocopherol as the NRV for vitamin E at step 8 as these values were based on the contributions of alpha-tocopherol alone.

References:

1. CRD6, Agenda Item 4, CCFNSDU38 (attached as separate document)
2. <http://www.futuremarketinsights.com/reports/tocotrienol-market>, retrieved on 19/6/2017, Tocotrienol Market : Global Industry Analysis and Opportunity Assessment , 2017 – 2027
3. <http://www.grandviewresearch.com/press-release/global-tocotrienol-market> dated 19/6/2017 , Tocotrienol Market Size To Reach \$387.6 Million By 2024, retrieved on 19/6/2017
4. <http://www.reportlinker.com/p04155650/Natural-Source-Vitamin-E-Market-Global-Industry-Analysis-Size-Share-Growth-Trends-and-Forecast.html>, retrieved on 19/6/2017, Natural Source Vitamin E Market - Global Industry Analysis, Size, Share, Growth, Trends and Forecast 2016 – 2024

PHILIPPINES

The Philippines could support the NRV Range of 5-15 ug/day with the footnote

“The value of 15 µg is based on minimal sunlight exposure throughout the year. Competent national and/or regional authorities should determine an appropriate NRV-R that best accounts for population sunlight exposure and other relevant factors “

The Philippines supports the proposed Nutrient Reference Value for Vitamin E (9 mg) the value of this nutrient is identical, if not closely similar with the value of the Philippine Dietary Reference Intakes (PDRI) for this vitamin.

Rationale:

We are in agreement with the conversion factors on Vitamin Dietary equivalents for Vitamin E 1 mg α-tocopherol = 1 mg RRR-α-tocopherol (d-α-tocopherol). This recommendation was also based on the average Acceptable Intakes from a number of Recognized Authoritative Scientific Bodies (RASBs).

SINGAPORE

Singapore supports the adoption of the NRV-R for vitamins D and E; and the conversion factors for vitamin E equivalents. These are essential nutrients for maintenance of health for the general population. The proposed values also took into consideration the General Principles for establishing NRVs for the General Population, and the recommendations made by the recognised authority scientific bodies (RASB), which are based on more recent evidence.

**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 Iran, United States of America

IRAN

- a) In table 1 foreign matter grade(II),(III) must be zero.
- b) Insect-damaged for all grade must be zero.
- c) In part labeling grade/class must be specified on the packaging.

UNITED STATES OF AMERICA

The United States appreciates the opportunity to provide comments in response to the Circular Letter (CL 2017/32-SCH) on the Proposed Draft Standard for Cumin.

General Comments:

Although we appreciate the substantial progress that was made to advance the proposed draft Standard at the 2017 Session of the Codex Committee on Spices and Culinary Herbs (CCSCH), we believe there are some issues related to defect levels that need further work in the Committee. Specifically, the United States noticed some technical errors within the text of Section 3.2: Quality Factors, in the Proposed Draft Standard for Cumin. In preparing our comments in response to this CL, the United States reviewed over twenty published standards from national authorities, commodity exchanges, international spice trade associations and other trading standards for cumin. From this review, it is clear that some additional work is warranted to ensure that the Codex standard does not lead to a decrease in the quality of spices in trade by allowing for higher levels of defects than current practice. We do not believe that this was the Committee's intention.

We believe this issue can be handled by the Committee without delaying adoption of the rest of the standard. While, at this time, the United States cannot recommend that the full standard be adopted by the CAC, we recommend retaining only Section 3.2 (Quality Factors) at Step 5 for further review by the Committee. We would support final adoption of all other sections of this standard for cumin at Step 8.

Specific Comments:

During the plenary discussions at the 2017 CCSCS Session, many substantial edits were made to the text; however, the Committee eventually agreed to forward the proposed Draft Standard for Cumin to the Codex Alimentarius Commission (CAC) 40 for adoption at Step 8. Unfortunately, although advance copies of the final text were requested, they were not made available until the morning of the report adoption as an appendix to the draft CCSCS 3 report. With the number of changes made during the plenary discussions, the CCSCS

needed to look at a clean version of the proposed standard (including all tables) to make sure everything was accurately captured.

Codex Procedures do not allow additional opportunities for further plenary or working group discussions at the report adoption. As a result, the current standard as proposed for final adoption is problematic. Specifically, with regard to Section 3.2, Quality Factors, Table 1, Physical requirements (Allowed tolerances for defects), within the current table for whole cumin/cracked cumin, it implies that if the maximum limit of each defect with m/m requirement allowed in each class is attained, and then combined, the Total Tolerance for defects will be the following:

- Class I/ Grade I: 6.7%
- Class II/ Grade II: 9.0%
- Class III/ Grade III: 10.0%

The current text in Section 3.2 Quality Factors of this draft standard has the following issues:

- includes higher or lower individual defect levels than what is currently accepted in international trade;
- combines some defects and accompanying tolerances that are tallied independently in trade;
- establishes a quality factor parameter (moisture content) that should be listed as a chemical characteristic in Table 2. This would be consistent with the format of the other proposed standards; and
- omits some defects that are allowed or not allowed by trade and regulatory agencies.

In the case of the draft standard for cumin, the current text in Section 3.2, Quality Factors, allows for higher levels of defects than are currently accepted in international trade.

With regard to the Table Layout and Method of Measuring Defects, the Physical Requirements table should differentiate between defects that affect eating quality (mold, foreign matter, rodent/animal anther contaminants) and those that affect physical appearance (size, color and broken/pieces). Such differentiation would facilitate the correct scoring of defects during application of the standard.

In the draft standard for cumin there is a single tolerance for dead insects, insect fragments, and rodent contamination; whereas in trade they are separated and therefore scored independently and differently. In trade, they are separated as follows:

- Defects for “Whole dead insects” are indicated independently and measured by count per kilogram not by mass fraction. (Whole insects are more easily identified.)
- Defects for insect fragments are indicated independently and measured by count per mass, i.e., number of pieces per 25 grams. (Insect fragments vary in size and are more difficult to identify.)

Paragraphs 14 c, d and e of the CCSCH 2017 report discusses infestations in Section 3.2.2 of the proposed draft standard for cumin, stating that the Committee:

- “c) Noted that this section covered more than one parameter i.e. it covered live insects as well as dead insects, insect fragments and rodent contamination generally considered collectively as filth; and that these aspects and mammalian excreta could be included in Table 1 as defects; and that only parameters measured by the naked eye apply.
- d) Further observed that the term “practically free” in case of defects was subjective; that cumin should not contain live insects as required by international Protocols; and that this was an important aspect for inspection of food commodities;
- e) Agreed to transfer the remaining requirements in section 3.2.2 (infestations) to Table 1.”

This paragraph is not fully captured in the Table 1. Furthermore, a tolerance was established for the number of dead insects, insect fragments, and rodent contamination, yet there is no record for the establishment of a tolerance level in the Committee report.

Table 1. Physical requirements for whole cumin/cracked cumin (Allowed tolerances for defects)

Parameter	Class/Grade		
	I	II	III
*Extraneous vegetable matter content, maximum, (% mass fraction)	1	2	3
*Foreign matter content, maximum, (% mass fraction)	0.1	0.5	0.5
*Mould visible, maximum, (% mass fraction)	1.0	1.0	1.0
*Proportion of damaged/defective fruits maximum, (% mass Fraction)	5.0	5.0	5.0
*Dead insects, insect fragments, rodent contamination max (% mass fraction)	0.1	0.5	0.5
*Insect-damaged matter, maximum, (% mass fraction)	0.5	1.0	1.0
*Live insects	0	0	0
Mammalian excreta (mg/kg)	1	1.0	1.0
*TOTAL DEFECTS ALLOWED per (% mass fraction)	6.7	9	10

The United States is concerned that if corrections are not made in this standard, its application would allow the distribution and sale of spices that are extremely tainted by defects. At such high defect levels, it would be very difficult to trade in such products that are extremely adulterated with insect and other filth, offering little consumer protection.

In the future we hope the texts of the draft standards for adoption will be circulated prior to the final session of plenary to facilitate in-depth technical review and further discussion if needed to prevent similar situations.

In summary, at this time, the United States cannot recommend that the full standard be forwarded for final adoption at the CAC. Instead, the United States recommends retaining Section 3.2- Quality Factors at Step 5 for further work, while allowing all other sections of this standard for Cumin to advance for final adoption at Step 8.

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

Comments of Iran, Philippines, United States of America

IRAN

1. Total ash, **14** % mass fraction (dry basis), maximum is suggested
2. We support all items of draft standard for dried thyme but in table 1: dried thyme must be free of insect and mold and foreign matters and then their must be zero.

PHILIPPINES

The Philippines supports the proposed draft standard for dried Thyme.

Rationale:

Since dried thyme is highly accepted and recommended as herb spice in different food recipes. Aside from it being an additive, previous studies showed that it prevents food poisoning and even decontaminates contaminated food. In addition, Thyme is known as a medicinal plant that helps combat various diseases.

UNITED STATES OF AMERICA

The United States appreciates the opportunity to provide comments in response to the Circular Letter (CL 2017/33-SCH) on the Proposed Draft Standard for Dried Thyme.

General Comments:

Although we appreciate the substantial progress that was made to advance the proposed draft Standard at the 2017 Session of the Codex Committee on Spices and Culinary Herbs (CCSCH 3), we believe there are some issues related to defect levels that need further work in the Committee. Specifically, the United States noticed some technical errors within the text of Section 3.2: Quality Factors, in the Proposed Draft Standard for Dried Thyme.

In preparing our comments in response to this CL, the United States reviewed published standards from national authorities, commodity exchanges, international spice trade associations and other trading standards for dried thyme. From this review, it is clear that some additional work is warranted to ensure that the Codex standard does not lead to a decrease in the quality of spices in trade by allowing for higher levels of defects than current practice. We do not believe that this was the Committee's intention.

We believe this issue can be handled by the Committee without delaying adoption of the rest of the standard. While, at this time, the United States cannot recommend that the full standard be adopted by the CAC, we recommend retaining only Section 3.2 (Quality Factors) at Step 5 for further review by the Committee. We would support final adoption of all other sections of this standard for dried thyme at Step 8.

Specific Comments:

During the plenary discussions at the 2017 CCSCCH Session, many substantial edits were made to the text; however, the Committee eventually agreed to forward the proposed Draft Standard for Dried Thyme to the Codex Alimentarius Commission (CAC) 40 for adoption at Step 8. Unfortunately, although advance copies of the final text were requested, they were not made available until the morning of the report adoption as an appendix to the draft CCSCCH 3 report. With the number of changes made during the plenary discussions, the CCSCCH needed to look at a clean version of the proposed standard (including all tables) to make sure everything was accurately captured.

Codex Procedures do not allow additional opportunities for further plenary or working group discussions at the report adoption. As a result, the current standard as proposed for final adoption is problematic. The current text in Section 3.2, Quality Factors, of this draft standard has the following issues:

- includes higher or lower individual defect levels than what is currently accepted in international trade;
- combines some defects and accompanying tolerances that are tallied independently in trade;
- establishes a quality factor parameter (moisture content) that should be listed as a chemical characteristic in Table 2. This would be consistent with the format of the other proposed standards; and
- omits some defects that are allowed by trade and regulatory agencies.

This is exemplified by the error in Table 1 (below) which published a level of 1.0 mg/kg (maximum) for mammalian excreta, whereas paragraph 34a of the CCSCCH 2017 report sets the value at 11 mg/kg. Compare these numbers to two existing published standards which set this value at 2.2 mg/Kg. In addition, as is evident in Table 1 below, at 1% mass fraction, the amount of dead insects, insect fragments, and rodent contamination is an excess amount and far exceeds anything currently in trade.

With regard to the Table Layout and Method of Measuring Defects, the Physical Requirements table needs to differentiate between defects that affect eating quality (mold, foreign matter, rodent/animal and other contaminants) and those that affect actual physical appearance (size and color). Such differentiation would facilitate the correct scoring of defects during application of the standard. There is also confusion in Table 1 because, according to current industry and trade practices, rodent contamination includes both rodent hair and rodent (mammalian) excreta. In the table, two different values are associated with the same defect, which will cause confusion in trade. We also believe a value for the maximum total level of adulteration needs to be established.

Table 1. Physical requirements for dried thyme (allowable tolerances for defects)

Parameter	Requirement
Extraneous vegetable matter ¹ , maximum % mass fraction	0.5
Foreign matter ² content, maximum % mass fraction	0.5
Mould visible, maximum % mass fraction	1.0
Insect damaged leaves/ flowers, maximum % mass fraction	1.0
Dead insects, Insect fragments and rodent contaminant, maximum % mass fraction	1.0
Live insects	0
Mammalian excreta maximum (mg/Kg)	1.0

¹ Vegetative matter associated with the plant from which the product originates - but is not accepted as part of the final product"

² Any visible objectionable foreign detectable matter or material not usually associated with the natural components of the spice plant; such as sticks, stones, burlap bagging, metal etc".

In the draft standard for dried Thyme there is a single tolerance for dead insects, insect fragments, and rodent contamination, whereas in trade, they are separated and scored independently and differently. In trade, they are divided as follows:

- Defects for “Whole dead insects” are indicated independently and measured by count per kilogram not by mass fraction. (Whole insects are more easily identified.)

Defects for insect fragments are indicated independently and measured by count per mass i.e., number of pieces per 25 grams. (Insect fragments vary in size and are more difficult to identify.) The United States is concerned that if corrections are not made in this standard, its application would allow the distribution and sale of spices that are extremely tainted by defects. At such high defect levels, it would be very difficult to trade in such products that are extremely adulterated with insect and other filth, offering little consumer protection.

In the future we hope the texts of the draft standards for adoption will be circulated prior to the final session of plenary to facilitate in-depth technical review and further discussion if needed to prevent similar situations.

At this time, the United States cannot recommend that the full standard be forwarded for final adoption at the CAC. Instead, the United States recommends retaining Section 3.2- Quality Factors at Step 5 for further work, while allowing all other sections of this standard for Dried Thyme to advance for final adoption at Step 8.

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

Comments of Iran, United State of America

IRAN

- a) In table 2 physical characteristics foreign matter and insect and mold must be zero.
- b) In part labeling must be determined production date and consumption date

UNITED STATE OF AMERICA

The United States appreciates the opportunity to provide comments in response to the Circular Letter (CL 2017/34-SCH) on the Proposed Draft Standard for Black, White and Green (BWG) Peppers.

General Comments:

Although we appreciate the substantial progress that was made to advance the proposed draft Standard at the 2017 Session of the Codex Committee on Spices and Culinary Herbs (CCSCH 3), we believe there are some issues related to defect levels that need further work in the Committee. Specifically, the United States noticed some technical errors within the text of Section 3.2: Quality Factors, in the Proposed Draft Standard for BWG Peppers. In preparing our comments in response to this CL, the United States reviewed over 40 published standards for black pepper (whole or ground) and at least 20 for white pepper from national authorities, commodity exchanges, international spice trade associations and other trading standards. From this review, it is clear that some additional work is warranted to ensure that the Codex standard does not lead to a decrease in the quality of spices in trade by allowing for higher levels of defects than current practice. We do not believe that this was the Committee’s intention.

We believe this issue can be handled by the Committee without delaying adoption of the rest of the standard. While, at this time, the United States cannot recommend that the full standard be adopted by the CAC, we recommend retaining only Section 3.2 (Quality Factors) at Step 5 for further review by the Committee. We would support final adoption of all other sections of this standard for BWG Peppers at Step 8.

Specific Comments

During the plenary discussions at the 2017 CCSCH Session, many substantial edits were made to the text; however the Committee eventually agreed to forward the proposed Draft Standard for BWG Peppers to the Codex Alimentarius Commission (CAC) 40 for adoption at Step 8. Unfortunately, although advance copies of the final text were requested, they were not made available until the morning of the report adoption, as an appendix to the draft CCSCH 3 report. With the number of changes made during the plenary discussions, the CCSCH needed to look at a clean version of the proposed standard (including all tables) to make sure everything was accurately captured.

Codex Procedures do not allow additional opportunities for further plenary or working group discussions at the report adoption. As a result, the current standard as proposed for final adoption is problematic. The current text in Section 3.2 Quality Factors of this draft standard has the following issues:

- includes higher or lower individual defect levels than what is currently accepted in international trade;
- combines some defects and accompanying tolerances that are tallied independently in trade;
- establishes a quality factor parameter (moisture content) that should be listed as a chemical characteristic in Table 2. This would be consistent with the format of the other proposed standards; and

- omits some defects that are allowed by trade and regulatory agencies. In the proposed draft standard for BWG, a review of Table 2. Characteristics For BWG Whole Peppers implies that if the maximum limit of each defect with m/m requirement allowed in each class is attained and then combined, the Total Tolerance for defects per class/ color is as follows:

Table 2. Physical characteristics for BWG whole peppers

Physical characteristics	Requirements								
	Black			White			Green		
	Class I/ Grade I	Class II/ Grade II	Class III/ Grade III	Class I/ Grade I	Class II/ Grade II	Class III/ Grade III	Class I/ Grade I	Class II/ Grade II	Class III/ Grade III
Bulk density, (g/l), min.	550	500	400	600	600	550	NA	NA	NA
**1 Light berries, % (m/m) max.	2.0	5.0	10.0	1.0	2.0	2.0	NA	NA	NA
**2 Extraneous vegetable matter, % (m/m), max.	1.0	2.0	2.0	1.0	1.5	2.0	0.5	1.0	1.2
**3 Foreign matter, % (m/m), max.	0.1	0.5	0.5	0.1	0.5	0.5	0.1	0.5	0.5
*Black berries/corns % (m/m), max.	NA	NA	NA	5.0	7.5	10.0	Nil	Nil	5.0
*Broken berries, % (m/m), max.	NA	NA	NA	2.0	3.0	3.0	1.0	3.0	10.0
*Mouldy Berries % (m/m), max.	1.0	2.0	3.0	1.0	2.0	3.0	Nil	1.0	2.0
*Insect defiled berries /Corns, % (m/m), max.	1.0	1.0	2.0	1.0	1.0	2.0	0.5	1.0	2.0
Mammalian or/and other excreta, (mg/kg), max.	1.0	1.0	2.0	1.0	1.0	2.0	1.0	1.0	2.0
**4 Pinheads for black pepper, % (m/m), max.	1.0	2.0	4.0	NA	NA	NA	NA	NA	NA
*TOTAL DEFECTS ALLOWED per (% mass fraction)	6.1	12.5	19.5	11.0	17.5	22.5	2.1	6.5	21.7
NA – NOT APPLICABLE									
<i>1* Light berries (in Black and White peppers only) - Generally immature berries without kernel with an apparent density lower than 0.30g/mL or 300 g/L</i>									
<i>2* Extraneous vegetative matter - Vegetative matter associated with the plant from which the product originates - but is not accepted as part of the final product". Light berries, pinheads or broken berries are not considered as extraneous matter.</i>									
<i>3* Foreign matter - Any visible objectionable foreign detectable matter or material not usually associated with the natural components of the spice plant; such as sticks, stones, burlap bagging, metal</i>									
<i>*4 Pinheads – Developed from unfertilized flowers, berries with a diameter of less than 2 mm with more angularity than normal berries, they have soft texture (collapse under heavy pressure) and have less odour and flavour than pepper</i>									

At such high defect levels, it would be very difficult to trade in such products, and the standard would offer little consumer protection.

With regard to the Table Layout and Method of Measuring Defects, the Physical Requirements table should differentiate between defects that affect eating quality (mold, foreign matter, rodent/animal anther contaminants) and those that affect physical appearance (size, color and broken/pieces). Such differentiation would facilitate the correct scoring of defects during application of the standard. In addition, paragraph 41c of the CCSC 2017 report states, "Section 3.2.2 Infestation – transferred the requirements on "free from live insects" and from dead insects, insect fragments and rodent contamination to the Table 2 on Physical characteristics for BWG whole peppers." However, this has not been incorporated into the final version of the draft standard.

Unlike other proposed standards, this standard does not set any limits on the number of dead insects, insect fragments, or rodent contamination. In trade, they are separated as follows:

- Defects for “Whole dead insects” are indicated independently and measured by count per kilogram not by mass fraction. (Whole insects are more easily identified.)
- Defects for insect fragments are indicated independently and measured by count per mass, (i.e., number of pieces per 25 grams. (Insect fragments vary in size and are more difficult to identify.)
- Rodent contamination is stated as the number of rat/mouse hairs found by count per mass (i.e., number per 25 gm).

The United States is concerned that if corrections are not made in this standard, its application would allow the distribution and sale of spices that are extremely tainted by defects. At such high defect levels, it would be very difficult to trade in such products that are extremely adulterated with insect and other filth, offering little consumer protection.

In the future we hope the texts of the draft standards for adoption will be circulated prior to the final session of plenary to facilitate in-depth technical review and further discussion if needed to prevent similar situations.

In summary, at this time, the United States cannot recommend that the full standard be forwarded for final adoption at the CAC. Instead, the United States recommends retaining Section 3.2- Quality Factors at Step 5 for further work, while allowing all other sections of this standard for BWG Peppers to advance for final adoption at Step 8.

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

Draft Standard for Fish Oils (REP 17/FO Para 28 Appendix III)

Comments of india

INDIA

Section 3.3.1

India proposes to increase the Peroxide Value to 10 milliequivalent of active oxygen/kg oil or more.

Rationale:

The Peroxide value of 5 milliequivalent in the draft Codex Standard as proposed is stringent and thus may exclude a large quantum of the commercial products normally found having a peroxide value of 10 milliequivalent of active oxygen/kg oil or more. Besides, higher peroxide values have already been specified by Codex in respect of refined oils upto 10 milliequivalent of active oxygen/kg oil and in Cold pressed & virgin oils upto 15 milliequivalent of active oxygen/kg oil.

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 Philippines

PHILIPPINES

The Philippine supports the adoption of the Proposed Draft Revision to the Standard for Olive Oils and Olive Pomace Oils (CODEX STA 33-1981): Revision of the Limit for Campesterol(N12-2015) at Step 5/8.

Rationale:

The Philippines has been importing most of its olive oils from Spain and this is being used in most of our fine cuisines and food preparations. The cost of importing olive oil from Spain is quite expensive, thus, the country must be ensured for the right quality of our imported olive oil.

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 specially true with olive oils and its authenticity is determined through its composition as campesterol and stigmasterol which would become its quality marker.

From the IOC (international Olive Oil Commission) Study on the Authentic Olive Oils, the limit of campesterol is ≤ 3.3 , however for stigmasterol, it is $\leq 1.4\%$.

Amendment to Section 2 in the Appendix of the Standard for Named Vegetable Oils
(CODEX STAN 210-1999): fatty acid range of crude rice bran oil
(REP 17/FO Para 82 Appendix IX)

Comments of Philippines

PHILIPPINES

Philippines supports the adoption of the AMENDMENT TO THE STANDARD FOR NAMED VEGETABLE OILS (CODEX STAN 210-1999)

Rationale:

The fatty acid profile of certain vegetable oil whether crude or refined will be the same. At present, rice bran is not yet introduced as food, however, to be able to enter world market, the proposal of India (the major producer of rice bran oil), should be considered.

The Philippines is supporting the inclusion of foot note to Table 1 of the Standard for Named Vegetable Oils (CODEX STAND 210-1999). In our country, there will be a condition that we will be able to produce rice bran oil, knowing that our staple food is rice.

**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 Philippines

PHILIPPINES

The Philippines supports the adoption of the specifications designated as “Full” for the following food additives:

1. Allura Red AC (INS No. 129) (R)
2. Acetylated oxidized starch (INS No. 1451) (R)
3. Aspartame (INS No. 951) (R)
4. Carob bean Gum (INS No. 410) (R)
5. Citric and fatty acid esters of glycerol (INS No. 472c) (R)
6. Lutein esters from *Tagetes erecta* (R)
7. Octanoic acid (R)
8. Octenyl succinic acid (OSA)–modified gum Arabic (INS No. 423) (R)
9. Oxidized starch (INS No. 1404) (R)
10. Pectins (INS No. 440) (R)
11. Quinolone Yellow (INS No. 104)
12. Starch acetate (INS No. 1420) (R)
13. Tartrazine (INS No. 102) (R)
14. Xanthan gum (INS No. 415) (R)

Rationale:

Based from the 82nd JECFA meeting last 7-16 June 2016, these food additives were evaluated toxicologically and concluded that dietary exposure to these additives do not present any health concern for any age group and were also evaluated by JECFA for specifications.

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 the Philippines

PHILIPPINES

The Philippines supports the food additive provisions of the General Standard for Food Additives (GSFA) (Draft and Proposed Draft): (CODEX STAN 192-1995) REP17/FA Paras 72 and 108 (i), Appendix VI, Part A as follows:

Part A.1 - Proposed draft and revision of adopted provisions in Tables 1 and 2 related to FC 01.2 (excluding FC 01.1.2) through FC 08.4

Additives	INS	Max Level	Notes	Philippine Position For The 39 th CAC
Food Category No. 01.2.1.1 Fermented milks (plain), not heat-treated after fermentation				
PROPYLENE GLYCOL ALGINATE	405	5000 mg/kg	234 & 235	Philippine supports proposal to adopt 5000 mg/kg max level with notes 234 and 235, its use is technologically justified. GMP is not appropriate for additives with numerical ADI.
Food Category No. 01.2.1.2 Fermented milks (plain), heat-treated after fermentation				
PROPYLENE GLYCOL ALGINATE	405	5000 mg/kg	234	Philippine supports proposal to adopt 5000 mg/kg max level with notes 234, its use is technologically justified. GMP is not appropriate for additives with numerical ADI.
Food Category No. 01.3.2 Beverage whiteners				
TOCOPHEROLS 5/8 2017	307a, b, c	200 mg/kg	XS250 & XS252	Philippine supports proposal to adopt [200 mg/kg with Note XS250 & XS252.

Part A.4 - Proposed draft and revision of adopted provisions in Tables 1 and 2 related to FC 01.1, 01.1.1, 01.1.3 and 01.1.4

Additives	INS	Max Level	Notes	Philippine Position For The 39 th CAC
Food Category No. 01.1.4 Flavoured fluid milk drinks				
ANNATTO EXTRACTS, BIXIN-BASED	160b(i)	20 mg/kg	8 & 52	The Philippines supports adoption of 20 mg/kg max level. (Adopted at Step 5/8)
ANNATTO EXTRACTS, NORBIXIN- BASED	160b(ii)	10 mg/kg	52 & 185	The Philippines supports adoption for use in products conforming to CS 243-2003 (Adopted at Step 5/8)
ASPARTAME	951	600 mg/kg	161, 191 & NN16	The Philippines supports adoption with new note for use in products conforming to CS 243-2003. (Adopted at Step 8)
AZORUBINE (CARMOISINE)	122	150 mg/kg	52	The Philippines supports adoption as the level conforms to CS 243-2003 (Adopted at Step 8)
BRILLIANT BLACK (BLACK PN)	151	150 mg/kg	52	The Philippines supports adoption as the level conforms to CS 243-2003 (Adopted at Step 8)
BROWN HT	155	150 mg/kg	52	The Philippines supports adoption as the level conforms to CS 243-2003. (Adopted at Step 8)

Additives	INS	Max Level	Notes	Philippine Position For The 39 th CAC
CAROTENES, BETA-, VEGETABLE	160a(ii)	1000 mg/kg	52 & NN12	The Philippines supports adoption with new note for use in products conforming to CS 243-2003. (Adopted at Step 8)
CAROTENOIDS	160a(i), a(iii),e,f	150 mg/kg	52 & NN13	The Philippines supports adoption with new note for use in products conforming to CS 243-2003 (Adopted at Step 8)
CURCUMIN	100(i)	150 mg/kg	52 & NN13	The Philippines supports adoption with new note for use in products conforming to CS 243-2003 (Adopted at Step 8)
DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL	472e	5000 mg/kg	NN10	The Philippines supports adoption with new note for use in products conforming to CS 243-2003 (Adopted at Step 8)
GRAPE SKIN EXTRACT	163(ii)	100 mg/kg	52, 181 & NN13	The Philippines supports adoption with new note for use in products conforming to CS 243-2003 (Adopted at Step 8)
INDIGOTINE (INDIGO CARMINE)	132	300 mg/kg	52 & NN13	The Philippines supports adoption with new note for use in products conforming to CS 243-2003 (Adopted at Step 8)
IRON OXIDES	172(i)-(iii)	20 mg/kg	52 & NN13	The Philippines supports adoption with new note for use in products conforming to CS 243-2003 (Adopted at Step 8)
LUTEIN FROM TAGETES ERECTA	161b(i)	100 mg/kg	52 & NN11	The Philippines supports adoption with new note for use in products conforming to CS 243-2003, (Adopted at Step 5/8)
PHOSPHATES	338; 339(i)-(iii); 340(i)-(iii); 341(i)-(iii); 342(i)-(ii); 343(i)-(iii); 450(i)-(iii),(v)-(vii), (ix); 451(i),(i i); 452(i)-(v); 542	1500 mg/kg	33, 364 & NN10	The Philippines supports adoption at 1000 mg/kg, singly or in combination, as phosphorus for use in products conforming to CS 243-2003. (Adopted at Step 8)
POLYGLYCEROL ESTERS OF FATTY ACIDS	475	2000 mg/kg		The Philippines supports adoption with new note for use in products conforming to CS 243-2003. (Adopted at Step 8)
SACCHARINS	954(i)-(iv)	80 mg/kg	161 & NN13, NN17	The Philippines supports adoption with new note for use in products conforming to CS 243-2003. (Adopted at Step 8)
SORBITAN ESTERS OF FATTY ACIDS	491-495	5000 mg/kg		The Philippines supports adoption as the level conforms to CS 243-2003 and is technologically justified. (Adopted at Step 8)

Additives	INS	Max Level	Notes	Philippine Position For The 39 th CAC
STEVIOL GLYCOSIDES	960	200 mg/kg	26 & XS243	The Philippines supports adoption of the new additive that can be used as an additional option by the Industry. (Adopted at Step 8)
SUCRALOSE (TRICHLOROGALAC TOSUCROSE)	955	300 mg/kg	161 & NN15	The Philippines supports adoption with new note for use in products conforming to CS 243-2003. (Adopted at Step 8)
SUCROGLYCERIDES	474	5000 mg/kg	348	The Philippines supports adoption as the level conforms to CS 243-2003. (Adopted at Step 8)
SUCROSE ESTERS OF FATTY ACIDS	473	5000 mg/kg	348	The Philippines supports adoption as the level conforms to CS 243-2003. (Adopted at Step 8)
TARTRAZINE	102	300 mg/kg	52	The Philippines supports adoption as the level conforms to CS 243-2003. (Adopted at Step 8)
ZEAXANTHIN, SYNTHETIC	161h(i)	100 mg/kg	52 & NN11	The Philippines supports adoption with new note for use in products conforming to CS 243-2003. (Adopted at Step 5/8)

Part A.5 – Revision of the provision for benzoates in FC 14.1.4

Additives	INS	Max Level	Notes	Philippine Position For The 39 th CAC
Food Category No. 14.1.4 Water-based flavoured drinks, including “sport”, “energy”, or “electrolyte” drinks and particulated drinks				
BENZOATES	210, 211, 212, 213	250 mg/kg	131 & 301	The Philippines supports 250 mg/kg as max level for Benzoates (INS 210-213) in food category 14.1.4 with Note 13 (as benzoic acid) and Note 131 (interim max level until CCFA50).

Note 8 As bixin.

Note 26 As steviol equivalents.

Note 33 As phosphorus.

Note 42 As sorbic acid.

Note 45 As tartaric acid.

Note 52 Excluding chocolate milk.

Note 131 For use as a flavour carrier only.

Note 161 Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble.

Note 181 As anthocyanin.

Note 185 As norbixin.

Note 191 If used in combination with aspartame-acesulfame salt (INS 962), the combined maximum use level, expressed as aspartame, should not exceed this level.

Note 234 For use as a stabilizer or thickener only.

Note 235 For use in reconstituted and recombined products only.

Note 281 For use in fresh minced meat which contains other ingredients apart from comminuted meat only.

Note 301 Interim maximum level until ~~CCFA49~~ CCFA50.

Note 348 Singly or in combination: Sucrose esters of fatty acids (INS 473), sucrose oligoesters, type I and type II (INS 473a) and sucroglycerides (INS 474).

Note 364 Singly or in combination.

Note XS243 Excluding products conforming to the Standard for Fermented Milks (CODEX STAN 243).

Note XS250 Excluding products conforming to the Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat (CODEX STAN 250-2006).

Note XS252 Excluding products conforming to the Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat (CODEX STAN 252-2006).

Codex Standard 243-003- Codex Standard For Fermented Milks

Codex Stan 250-2006 - Standard For A Blend Of Evaporated Skimmed Milk And Vegetable Fat

Codex Stan 252-2006 - Codex Standard For A Blend Of Sweetened Condensed Skimmed Milk And Vegetable Fat

- **Revised food additives sections of the Standards for Preserved Tomatoes (CODEX STAN 13-1981), Processed Tomato Concentrates (CODEX STAN 57-1981), Quick Frozen Fin-Fish, Uneviscerated and Eviscerated (CODEX STAN 36-1981), Quick Frozen Shrimps or Prawns (CODEX STAN 92- 1981), Quick Frozen Lobsters (CODEX STAN 95- 1981), Quick Frozen Blocks of Fish Filets (CODEX STAN 165-1989), Quick Frozen Fish Fillet (CODEX STAN 190-1995), Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded and in Batter (CODEX STAN 166-1989), and Fresh and Quick Frozen Raw Scallop Products (CODEX STAN 315-2014) REP17/FAPara. 55 (i) point a,b, Appendix V**

Philippines supports the eWG's proposed amendments to the Food Additive provisions of the Codex Commodity Standards for Frozen Fish Standards for alignment such as the deletion of the Food Additives List in the Codex Commodity Standard for: *Quick Frozen Finfish, Uneviscerated and Eviscerated*(CODEX STAN 36-1981); *Quick Frozen Shrimps or Prawns* (CODEX STAN 92-1981); *Quick Frozen Lobsters* (CODEX STAN 95-1981); *Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh* (CODEX STAN 165-1989); *Quick Frozen Fish Sticks (Fish Fingers), Fish portions and Fish Fillets-Breaded and in Batter* (CODEX STAN 166-1989); *Quick Frozen Fish Fillets* (CODEX STAN 190-1995); *Quick Frozen Raw Squid* (CODEX STAN 191 -1995); *Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008); *Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing* (CODEX STAN 312-2014); and *Fresh and Quick Frozen Raw Scallop Products* (CODEX STAN 315-2014) described in Appendix 2.

Rationale:

The proposed amendment recognizes the GSFA as the single reference point for food additives within CODEX while taking into account food additive provisions in the commodity standards for frozen fish products under food categories 9.2.1 and 9.2.2, thus simplifying the Commodity standards.

**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 Canada, European Union, United States of America

CANADA

Canada has no objection to the proposed draft and draft MRLs at Steps 5/8 and 8.

EUROPEAN UNION

The European Union (EU) supports the adoption of all the proposed draft MRLs in Appendix II (step 8) and III (step 5/8) of REP 17/PR with the exception of the draft MRLs for the substances/commodities below for which the EU requests that its **reservations** are included in the report of CAC 40.

The EU has a policy in place whereby EU MRLs will be aligned with Codex MRLs if three conditions are fulfilled: (1) that the EU sets MRLs for the commodity under consideration, (2) that the current EU MRL is lower than the CXL, and (3) that the CXL is acceptable to the EU with respect to areas such as consumer protection, supporting data, and extrapolations. Reservations address the cases where the EU considers the third criterion

not to be met, with the aim of increasing transparency and predictability regarding the impact of the work of the Codex Alimentarius Commission on EU legislation.

CHLORPYRIFOS-METHYL (90): The EU confirms its reservation for the proposed draft MRLs for barley; wheat; wheat bran unprocessed; and wheat germ as the compound is currently the subject of an ongoing review.

METHOPRENE (147): The EU confirms its reservation for the proposed draft MRLs for oilseed, except peanut as a chronic dietary exposure concern had been identified for European consumers and that studies investigating the metabolic behaviour following post-harvest treatment and on the nature and magnitude of the residues in processed products were not available.

BUPROFEZIN (173): The EU confirms its reservation for the proposed draft MRLs for avocado, basil and soya bean (dry) because of health concern arising from the potential presence of aniline under high temperature processing conditions.

PENCONAZOLE (182): The EU confirms its reservation for all the proposed draft MRLs as the compound is currently the subject of an ongoing review.

TEFLUBENZURON (190): The EU confirms its reservation for the proposed draft MRLs for apples on the methodological concerns, and for the meat MRLs due to different policies on the setting of MRLs for muscle and fat for fat soluble pesticides.

FIPRONIL (202): The EU confirms its reservation for the proposed draft MRL for Basil due to a different residue definition for enforcement.

CHLORANTRANILIPROLE (230): The EU confirms its reservation for the proposed draft MRL for poultry meat due to their different policy on setting MRLs for muscle and fat for fat soluble pesticides.

SAFLUFENACIL (251): The EU confirms its reservation for all the proposed draft MRLs due to a different enforcement residue definition. An ARfD has been established in the EU and a potential acute dietary exposure concerns has been identified for edible offal (mammalian).

BENZOVINDIFLUPYR (261): The EU confirms its reservation for the proposed draft MRLs for Fruiting vegetables, Cucurbits, due to a different policy on setting crop group MRLs; on proposed draft MRLs for meat due to a different policy on setting MRLs for muscle when considering fat soluble residues.

BIXAFEN (262): The EU confirms its reservation for the proposed draft MRLs for meat (from mammals other than marine mammals) and poultry meat due to a different policy on setting MRLs for muscle and fat for fat-soluble pesticides.

FLUENSULFONE (265): The EU confirms its reservation for all the proposed draft MRLs, as the residue definitions are questioned. The metabolism studies are not representative for the residue behaviour observed in the residue trials. In addition the EU is of the opinion that the genotoxic potential of MeS cannot be excluded and that further genotoxicity tests would be needed to follow up on the positive results in vitro.

FLONICAMID (282): The EU confirms its reservation for the proposed draft MRLs for food commodities of plant origin because of a different residue definition for enforcement.

FLUAZIFOP-P-BUTYL (283): The EU confirms its reservation for the proposed draft MRLs for cabbages, head; tomato; beans, except broad bean and soya bean (green pods and immature seeds); peas, shelled (succulent seeds); beans (dry); carrot; potato; swede; turnip, garden; sunflower seed; meat (from mammals other than marine mammals); mammalian fats (except milk fats); edible offal (mammalian); milks; poultry meat; poultry fats; poultry, edible offal of; eggs due to acute exposure concerns and different policies in setting MRLs for muscle when considering fat soluble residues.

FLUPYRADIFURONE (285): The EU confirms its reservation for all the proposed draft MRLs due to a different residue definition for enforcement.

ACIBENZOLAR-S-METHYL (288): The EU confirms its reservation for the proposed draft MRLs for brassica (Cole or cabbage) vegetables, head cabbages, flowerhead brassicas; brassica leafy vegetables; and fruiting vegetables, cucurbits (due to a acute dietary exposure concern for EU consumers) and for citrus fruits; and kiwi fruit (due to lack of metabolism studies reflecting soil treatment).

IMAZETHAPYR (289): The EU confirms its reservation for all the proposed draft MRLs pending the outcome of the ongoing evaluation of an import tolerance request in the EU.

ISOFETAMID (290): The EU confirms its reservation for the proposed draft MRLs for animal commodities due to their different residue definition for enforcement.

OXATHIPIPROLIN (291): The EU confirms its reservation for all the proposed draft MRLs. For plant commodities, the reservations are due to the lack of information on concentrations of metabolites included in the residue definition for dietary risk assessment, in commodities from treated crops. For commodities of animal origin, the presentation of the assessment of animal products did not allow to verify the validity of the proposed MRLs.

PENDIMETHALIN (292): The EU confirms its reservation for the proposed draft MRLs for brassica leafy vegetables, except kale because of a different scientific methodology as regards the extrapolation from residue trials; meat (from mammals other than marine mammals) and poultry meat because of a different policy to set MRLs for muscle for fat soluble pesticides., and welsh onion and spring onion because of an insufficient number of trials.

PINOXADEN (293): The EU confirms its reservation for all the proposed draft MRLs due to a different residue definition for enforcement.

SPIROMESIFEN (294): The EU confirms its reservation for all the proposed draft MRLs due to a different residue definition for enforcement.

UNITED STATES OF AMERICA

The United States supports the advancement of the proposed draft and draft MRLs for pesticides in food and feed at Steps 5/8 and 8 of the Codex Procedure. Specifically, CCPR 2017 agreed to forward 4 MRLs at Step 8 and 484 MRLs at Step 5/8 for final adoption by the Codex Alimentarius Commission (CAC). This is an unprecedented number of MRLs moving forward in one CCPR session; fewer than 400 MRLs were adopted in 2016. These MRLs are associated with 26 pesticides; 358 of the MRLs are for plant commodities, while 130 are for animal commodities. Crop Group and Subgroup MRLs accounted for 73 of the 488 MRLs forwarded for adoption. The United States would like to commend the CCPR in its use of the criteria for decision-making in Codex and the accelerated procedure (Step 5/8) to bring such great success at its recent session.

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

Comments of Canada, United States of America

CANADA

Canada supports the revised vegetable commodity groups (Type 02) of the Classification of Food and Feed, and is also in agreement with the adoption of proposed draft examples of representative commodities for vegetables (Table 2) and grasses (Table 3).

Canada has no objection to the proposed draft revised Group 024 (Seeds for beverages and sweets) of the Classification of Food and Feed with no additional comments on this group at this time.

UNITED STATES OF AMERICA

In recent years, the Codex Committee on Pesticide Residues (CCPR) has agreed to revise all of the crop groups in the Food and Animal Feeds Classification. The request for comments in this CL covers a part of this ongoing effort. The United States has co-chaired or chaired the electronic Working Group from the start of this effort, has provided much of the documentation for the proposed crop groups, and strongly supports this project.

The United States supports the advancement of the revised vegetable commodity groups, Group 20 (Grasses of Cereal Grains) and Group 021 (Grasses for Sugar or Syrup Production), as well as Tables 2 (Examples of representative commodities for vegetable commodity groups) and Table 3 (Examples of representative commodities for grasses) for final adoption.

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 Canada, Egypt, United States of America

CANADA

In general, Canada supports the final adoption of the Guidelines at Step 5/8 with some minor changes or corrections as noted below. Canada also noted that food and feed are very different matrices but agrees with the adoption of the current version of Guidelines at the present time.

Paragraph 34 line 3-4:

The samples and at least 5 matrix blanks **are** from different sources (e.g. obtained from different markets or different agricultural fields, etc.).

Paragraph 47 e line 1-2:

All measured reagent and matrix blank samples should be free of carry-over, contamination, **or** interferences with a response $\leq 20\%$ of the LOQ. For **some** matrix blank samples, $\leq 30\%$ of **the** LOQ may be acceptable.

Paragraph 49 line 1-3:

Methods based on high-resolution mass spectrometry are considered to provide improved reliability through accurate measurement of the mass/charge of the ion that cannot otherwise be obtained using unit-resolution mass spectrometry techniques.

EGYPT

Egypt supports the proposed draft Guidelines on performance criteria for methods of analysis for the determination of pesticide residues in food and feed (CL 2017/64-PR) to be adopted in CAC 40 at Step 5/8.

UNITED STATES OF AMERICA

The United States, as the lead country in the drafting and development of this guidance document, is pleased with the progress at recent CCPR sessions. In an effort to finalize the document, at the May 2017 session, the Committee formed an in-session Working Group to consider written comments submitted and viewpoints of the participating Members and Observers. After incorporating changes to improve the clarity and consistency of the text and reaching a consensus on extending the scope to cover “feed” in addition to “food,” the CCPR agreed to forward the proposed guidance to the CAC for final adoption.

The United States supports final adoption at Step 8 of the proposed guidance on performance criteria for methods of analysis for the determination of pesticide residues in food and feed. We would also like to acknowledge the contributions of India and China, as co-authors, on this document.

**Coordinating Committee for Near East
Comité de Coordination pour le Proche-Orient
Comité Coordinador para el Cercano Oriente**

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

Comments of Iran, the International Dairy Federation (IDF)

IRAN

PROPOSED DRAFT REGIONAL STANDARD FOR DOOGH

1. SCOPE

This standard applies to Doogh for direct consumption or for further processing, in conformity with the definitions in Section 2 of this Standard. This Standard should be read in conjunction with the Standard for Fermented Milks (CODEX STAN 243-2003).

2. DESCRIPTION

Doogh is a ‘Drink based on Fermented Milk’ as defined in Section 2.4 of the Standard for Fermented Milks (CODEX STAN 243-2003), obtained by mixing **yoghurt** as defined in Sections 2.1 and 3.3 of the same standard, **with potable water and regularly edible salt or mixing milk with potable water and regularly edible salt** prior to heat treatment and fermentation to give an end product with similar character as the product under the provisions of this standard. When Doogh is produced by mixing milk with potable water, edible salt may be added before or after fermentation.

The milk used for production of Doogh may have been manufactured from products obtained from milk as specified in Section 2.1 of the Standard for Fermented Milks, with or without the compositional modification as limited by the provision in Section 3.3.

In production of Doogh, other non-dairy ingredients than potable water as well as various dairy ingredients/dairy products are used, according to Sections 3 and 4.

The typical starter microorganisms used in production of Doogh are traditional **yoghurt** bacteria: *Streptococcus thermophilus* and *Lactobacillus delbrueckii* ssp. *bulgaricus*. Other microorganisms than those constituting the specific starter cultures may be added. If the product is heat treated after fermentation, the requirement for viable microorganisms does not apply. Heat treatment after fermentation does not apply for 'probiotic' Doogh (Doogh containing probiotic microorganisms).

Doogh without adding flavorings/flavor is so-called 'plain Doogh'. Doogh with flavors in the form of essences or extracts (such as mentol, ziziphore or wild thyme, pennyroyal and cucumber) or with different natural flavorings such as aromatic herbs, spices and condiments is known as 'flavored Doogh'. 'Carbonated/Uncarbonated' and 'Heat treated/Un-heat treated' Dooghs represent those contain/does not contain carbon dioxide and those with heat treatment/without heat treatment after fermentation, respectively. Doogh may be produced and displayed as powder (dried Doogh) for special applications and demands.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1. Raw Materials

- **Yoghurt** (in mixing **yoghurt** with potable water) or milk (in mixing milk with potable water). **Yoghurt** should conform to Standard for fermented Milks (CODEX STAN 243-2003).
- Potable water for dilution of **yoghurt** or milk, and probably for the use in reconstitution or recombination (if milk is prepared by reconstitution or recombination).

3.2. Permitted Ingredients

- 3.2.1 Starter culture of harmless microorganisms including typical Doogh starters, as described in Section 2 of this standard;
- 3.2.2 Other harmless and suitable microorganisms (**bacteria or yeast**) as starter- or non-starter microorganisms for the functions of acidification, aroma production, fermenting carbonation, texture improvement, health promotion, and improving other functional aspects of product;
- 3.2.3 Sodium chloride, in accordance with the Standard for Food Grade Salt (CODEX STAN 150-1985);
- 3.2.4 Natural flavoring substances such as fine particles of aromatic vegetables and herbs, and spices and/or flavours, as specified in Section 2.3 of the Standard for Fermented Milks (CODEX STAN 243-2003);
- 3.2.5 **Nutraceutical ingredients such as dietary fibers;**
- 3.2.6 Dairy ingredients or dairy products obtained from milk such as milk proteins, milk powders, milk fat (butter fat or cream), buttermilk and whey products. For Milk powders this would be the Standard for Milkfat Products (CODEX STAN products 280-1973) and Cream as is defined in Section 2.1 of the Standard for Cream and Prepared Creams (CODEX STAN 288-1976).
- 3.2.7 **Potable water**

3.3. Composition

pH	Max: 4.5
Lactic acid (%m/m)	Min: 0.3
Milk solid non-fat (MSNF)	Min: 3.0
Milk protein^(a) (%w/w)	Min: 1.08%
Sum of microorganisms constituting the starter culture defined in Section 2 (cfu/g, total count) ^(b)	Min: 10⁷
Labelled microorganisms ^(c) (cfu/g, each strain)	Min: 10⁷

^(a) Protein content is '6.38 multiplied by the total Kjeldahl nitrogen determined'. **Partial or full replacement milk protein with other sources of non-dairy fat or non-dairy protein shall not be allowed.**

^(b) This requirement does not apply to products 'heat treated after fermentation'. The microbiological criteria in the product are valid up to the 'date of minimum durability' under the storage conditions specified in the labeling.

^(c) Applies when claimed microorganisms (as specified in Section 2 of this standard) are added to the product. The microbiological criteria in the product are valid up to the 'date of minimum durability' under the storage conditions specified in the labeling.

4. FOOD ADDITIVES

4.1. Only those additives classes indicated in the Table below may be used for the product categories specified. Within each additive class, and where permitted according to the Table, only those individual additives listed may be used and only within the limits specified.

In accordance with Section 4.1 of the Preamble to the *General Standard for Food Additives* (CODEX STAN 192-1995), additional additives may be present in the flavored doogh as a result of carry-over from non-dairy ingredients.

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 be 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.

INS No.	Name of additive	Maximum level
Carbonating agents		
290	Carbon dioxide	GMP
Stabilizers and Thickeners		
170(i)	Calcium carbonate	GMP
331(iii)	Trisodium citrate	GMP
338	Phosphoric acid	1000 mg/kg ,singly or in combination, as phosphorus
339(i)	Sodium dihydrogen phosphate	
339(ii)	Disodium hydrogen phosphate	
339(iii)	Trisodium phosphate	
340(i)	Potassium dihydrogen phosphate	
340(ii)	Dipotassium hydrogen phosphate	
340(iii)	Tripotassium phosphate	

INS No.	Name of additive	Maximum level	
341(i)	Monocalcium dihydrogen phosphate		
341(ii)	Calcium hydrogen phosphate		
341(iii)	Tricalcium orthophosphate		
342(i)	Ammonium dihydrogen phosphate		
342(ii)	Diammonium hydrogen phosphate		
343(i)	Monomagnesium phosphate		
343(ii)	Magnesium hydrogen phosphate		
343(iii)	Trimagnesium phosphate		
450(i)	Disodium diphosphate		
450(ii)	Trisodium diphosphate		
450(iii)	Tetrasodium diphosphate		
450(v)	Tetrapotassium diphosphate		
450(vi)	Dicalcium diphosphate		
450(vii)	Calcium dihydrogen diphosphate		
451(i)	Pentasodium triphosphate		
451(ii)	Pentapotassium triphosphate		
452(i)	Sodium polyphosphate		
452(ii)	Potassium polyphosphate		
452(iii)	Sodium calcium polyphosphate		
452(iv)	Calcium polyphosphate		
452(v)	Ammonium polyphosphate		
542	Bone phosphate		
400	Alginate acid		GMP
401	Sodium alginate		
402	Potassium alginate		
403	Ammonium alginate		
404	Calcium alginate		
405	Propylene glycol alginate		
406	Agar		
407	Carrageenan		

INS No.	Name of additive	Maximum level	
407a	Processed eucheama seaweed (PES)		
410	Carob bean gum		
412	Guar gum		
413	Tragacanth gum		
414	Gum Arabic (Acacia gum)		
415	Xanthan gum		
416	Karaya gum		
417	Tara gum		
418	Gellan gum		
425	Konjac flour		
440	Pectins		
459	Cyclodextrin, -beta		5 mg/kg
460(i)	Microcrystalline cellulose (Cellulose gel)		GMP
460(ii)	Powdered cellulose		
461	Methyl cellulose		
463	Hydroxypropyl cellulose		
464	Hydroxypropyl methyl cellulose		
465	Methyl ethyl cellulose		
466	Sodium carboxymethyl cellulose (Cellulose gum)		
467	Ethyl hydroxyethyl cellulose		
468	Cross-linked sodium carboxymethyl cellulose (Cross-linked cellulose gum)		
469	Sodium carboxymethyl cellulose, enzymatically hydrolyzed (Cellulose gum, enzymatically hydrolyzed)		
470(i)	Salts of myristic, palmitic and stearic acids with ammonia, calcium, potassium and sodium		
470(ii)	Salts of oleic acid with calcium, potassium and sodium		
471	Mono- and di- glycerides of fatty acids		

INS No.	Name of additive	Maximum level
472a	Acetic and fatty acid esters of glycerol	
472b	Lactic and fatty acid esters of glycerol	
472c	Citric and fatty acid esters of glycerol	
508	Potassium chloride	
509	Calcium chloride	
511	Magnesium chloride	
1200	Polydextrose	
1400	Dextrins, roasted starch	
1401	Acid treated starch	
1402	Alkaline treated starch	
1403	Bleached starch	
1404	Oxidized starch	
1405	Starches, enzyme treated	
1410	Mono starch phosphate	
1412	Distarch phosphate	
1413	Phosphated distarch phosphate	
1414	Acetylated distarch phosphate	
1420	Starch acetate	
1422	Acetylated distarch adipate	
1440	Hydroxypropyl starch	
1442	Hydroxypropyl distarch phosphate	
1450	Starch sodium octenyl succinate	
1451	Acetylated oxidized starch	

4.2. Flavorings

The flavorings used in Doogh covered by this standard should comply with the Guidelines for the use of flavorings (CAC/GL 66-2008).

5. CONTAMINANTS

5.1. The milk used in the manufacture of the products covered by this Standard shall comply with the maximum levels of the *General Standard for Contaminants and Toxins in Food and Feed* (CODEX STAN 193-1995).

5.2. The milk used in the manufacture of the products covered by this Standard shall comply with the maximum residue limits for pesticides and veterinary drugs established by the Codex Alimentarius Commission.

6. HYGIENE

- 6.1. It is recommended that the products covered by the provisions of this Standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CAC/RCP 1-1969), the Code of Hygienic Practice for Milk and Milk Products (CAC/RCP 57-2004) and other relevant Codex texts such as codes of hygienic practice and codes of practice.
- 6.2. The products should comply with any microbiological criteria established in accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria related to Foods (CAC/GL 21-1997).

7. PACKAGING AND STORAGE

- 7.1. The product shall be packed in containers which preserve the hygienic quality and the other qualities of the food.
- 7.2. Doogh shall be stored under appropriate conditions, e.g. refrigerated.

8. LABELLING

In addition to the provisions of the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985) and the General Standard for the Use of Dairy Terms (CODEX STAN 206-1999), the following specific provisions apply:

8.1. Name of the Food

- 8.1.1 The name of the food shall be 'Doogh'.
- 8.1.2 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' shall be applied before the word 'Carbonated' in product designation to represent the source of carbonation.
- 8.1.3 The designation of 'Flavored Doogh' shall be used as the name of product if any flavoring substance is added.
- 8.1.4 For Doogh powder, the name 'Doogh powder' or 'Dried Doogh' shall be inserted in marking.

8.2. Declaration of Fat Content

If the consumer would be misled by the omission, the milk fat content shall be declared in a manner acceptable in the country of sale to the final consumer, either as (i) a percentage of mass or volume, or (ii) in grams per serving as qualified in the label, provided that the number of servings is stated. Any labeling should be in accordance to the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997).

8.3. Labelling of Non-Retail Containers

Information required in Section 8 of this Standard and Sections 4.1 to 4.8 of the General Standard for the Labelling of Pre-packaged Foods, and, if necessary, storage instructions, shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and address of the manufacturer, packer, distributor or importer, as well as storage instructions, shall appear on the container. However, lot identification, and the name and address of the manufacturer, packer, distributor or importer may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.

9. METHODS OF ANALYSIS AND SAMPLING

For checking the compliance with this Standard, the methods of analysis and sampling for fermented milks contained in the Recommended Methods of Analysis and Sampling (CODEX STAN 234-1999) relevant to the provisions in this standard, shall be used.

INTERNATIONAL DAIRY FEDERATION (IDF)

The International Dairy Federation (IDF) would like to thank the Islamic Republic of Iran as chair of the CCNEA and former eWG chair, for leading the work on the draft Standard for Doogh. We welcome the opportunity to comment on the latest draft as outlined in CL 2017/58/OCS-NEA.

IDF recognizes and appreciate that many of our comments made have been taken into account. We would like to make following editorial comments to draft standard outlined in CL 2017/58/OCS-NEA.

- IDF notes that the word yogurt is used throughout the Standard, which is not consistent with the Codex Standard for Fermented Milks (Codex Stan 243-2003) where the word yoghurt is used throughout.

In section 3.3 composition IDF would like to mention that in Codex Standard of Fermented Milks (Codex Stan 243-2003) **titratable acidity expressed as lactic acid (% m/m)** is the parameter used.

- In section 4. Food Additives we believe the headings of the table should be reversed. We believe the headings should be as follows:

	Non-heat treated Doogh		Heat treated Doogh	
Additive class	Plain	Flavoured	Plain	Flavoured

- In section 8.1.2 we would suggest rewording the carbonated products to the following “Doogh Carbonated by Fermentation” and “Doogh Carbonated by Injection”.
- Unlike in CS 243-2003, the draft does not have the provisions for food additives in the Functional Classes of Acidity Regulators, Colours, Emulsifiers, Packaging gases and Preservatives in Table 3 being allowed, in addition to the specific additives listed in the long table. IDF suggested, in earlier comments to CL 2017//08-NE, the inclusion of the following amended text (based on that in CX 243-2003), that

“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”.

This would have covered their position by omitting acidity regulators, but retaining the other 3 functional classes. We wish to mention that there are some consequences of not including the proposed wording. For example, no Packaging Gases are listed as permitted, although the functional class is allowed, based on the table in the Table. Furthermore, propionates (as preservatives in Table 3 of the GSFA) are not permitted and similarly, some widely used Table 3 emulsifiers, e.g. INS 471 Mono- and di-glycerides of fatty acids permitted.

We provide this comment for consideration; we do not necessarily request inclusion of the above proposal, just to point out consequences of its non-inclusion.

With these comments for your further consideration, IDF would support the adoption of the standard of Doogh at step 5/8.

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 Ecuador

ECUADOR

Ecuador agradece el trabajo realizado por el Grupo de trabajo electrónico, presidido por Dinamarca, y una vez realizado el análisis correspondiente al PROYECTO DE NORMA PARA nLOS PERMEADOS LÁCTEAS EN POLVO, el país, no tiene observaciones al documento; en este sentido apoya el avance del mismo, al siguiente trámite.