

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda items 5, 6 and 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-third Session

Comments from Thailand

Agenda Item 5 Final adoption of Codex texts

CCFFV

Draft Standard for Ware Potatoes

According to the 21st session of CCFFV, the committee agreed to forward the draft standard for ware potatoes to CAC43 for adoption at step 8. However, Thailand reserved our position on the percentage of defective produce, by number or weight for “Extra Class” in the table of section 5.1 Quality Tolerance.

We still are of the view that “Extra Class” should be superior quality and total tolerance should not be allowed. Its quality must be better than produce in the other classes in order to justify the high price. Hence, it is not justified to make allowance for defects, decay, soft rot and/or internal break down, extraneous matter and soil, especially those that are not allowed in minimum requirements. We also would like to provide our comments on the following sections:

1. The scope highlights that “The purpose of the standard is to define the quality requirements for ware potatoes after preparation (e.g. brushing and/or washing) ...”. So, soil should not be found in the produce, especially in Extra class, after washing.

2. In the minimum requirement, the followings are not allowed:

- Green colouration; pale green flush exceeding one eighth of the surface area; o brown stains;
- cracks cuts, bruises or roughness exceeding 4 mm in depth;
- serious deformities; o grey, blue or black sub-epidermal stains; exceeding 5 mm in depth;
- hollow or black hearts and other internal defects;
- deep common potato scab and powdery potato scab3, of a depth of 2 mm or more
- superficial common potato scab, i.e. scab spots in all must not extend over more than a quarter of the surface of the tuber

So, the defects as above should not be found in the produce, especially “Extra Class”.

However, Thailand has no objection on the adoption at step 8, but we would like to express our reservation on the percentage of defective produce, by number or weight for “Extra Class”.

Draft Standard for Yam

Referring to the 21st session of CCFFV, Thailand reserved our position on the provision allowing a tolerance for decay in “Extra Class” as specified in Section 5.1.1.

Thailand is of the view that decay may also be serious defects affecting the quality of produce. It can be caused by diseases and serious injuries. However, the cause of the decay is difficult to determine. So, the produce in “Extra Class” should only be of superior quality. Its quality must be better than produce in the other classes in order to justify the high price. Consequently, it would not be justified to make allowance for decay in “Extra Class”.

So, Thailand has no objection on the adoption of the draft Standard for Yam at step 5/8 but reiterates its reservation on the issue concerning tolerance for decay in "Extra Class".

CCFH

Draft Code of Practice on Food Allergen Management for Food Business Operators

Thailand has no objection to the adoption of the Draft Code of Practice at Step 8.

Proposed Draft revision of the General Principles of Food Hygiene (CXC 1-1969)

Thailand supports the adoption of the Proposed Draft revision of the General Principles of Food Hygiene at Step 5/8.

CCNFSDU

Provision for xanthum gum (INS 415) and pectins (INS 440) in the Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants (CXS 72-1981)

Thailand does not oppose the adoption of the proposed use levels for xanthum gum (INS 415) and pectins (INS 440) in the infant formula and formulas for special medical purposes intended for infants.

CCPFV

Proposed draft general standard for dried fruits

Thailand supports the adoption of the proposed standard at Step 5/8.

Proposed draft general standard for canned mixed fruits

Thailand agrees with the adoption of the proposed standard at Step 5/8.

Agenda Item 6 Adoption of Codex texts at Step 5

CCFH

Proposed draft guidance for the management of biological foodborne outbreaks

Thailand has no objection to the adoption of the proposed standard at Step 5.

CCNFSDU

Review of the Standard for Follow-up Formula: Section B: Proposed draft scope, definition and labelling

Thailand does not oppose the adoption of the proposed draft revised standard for follow-up formula in scope, definition, and labelling in section B: Drink/Product for young children with added nutrients or Drink for young children at Step 5. However, we have two concerns on the proposed draft as the following:

Title of Section B

Thailand still has a concern related to the title of Section B to indicate the name for the product since there is time constraint during CCNFSDU 41.

The use of the name as "Drink / product for young children with added nutrients or drink for young children" may create confusion and misuse of food additives. According to General Standard for Food Additives (CXS 192-1995), this product is under food category 13 (food for infant and young children), while food category 14 covers water, sports drink and soft drinks. Thus, the word "Drink" might cause misleading for use of food additives. Also, this product is formulated to provide core and optional nutrients to fulfill requirements for

young children, therefore the name of the product shall emphasize on the true nature of the food as in 4.1 General Standard for the Labelling of Prepackaged Foods (CXS 1-1985).

Name of the product does not only affect the food category of the product and the related list of food additives, but it is also critical for consumer's perception and understanding. Without an appropriate name of the product, international trade may as well be affected.

Section 9.6.5

The other issue is that we are of the view that the similar text in Section 9.6.5, should be deleted since it is repetitive with the text in Section 9.6.4, as follows:

"9.6.4 The product as defined in Section 2.1 shall be distinctly labelled in such a way as to avoid any risk of confusion with infant formula, follow-up formula for older infants, and formula for special medical purposes intended for infants, in particular as to the text, images and colours used, to enable consumers to make a clear distinction between them.

9.6.5 The labelling of the product as defined in Section 2.1 shall not refer to infant formula, follow-up formula for older infants, or formula for special medical purposes intended for infants, including numbers, text, statements, or images of these products."

Therefore, we would like to suggest putting square brackets around the title of Section B including the related text in Section 9.1 "Drink/product for young children with added nutrients or Drink for young children" and Section 9.6.5 in order to further discuss in CCNFSDU42. So, CAC should be requested to note the needs on careful reconsideration of these issues at the next CCNFSDU.

TFAMR

Proposed draft revised Code of Practice to Contain and Minimize Foodborne Antimicrobial Resistance (CXC 61-2005) at Step 5

Thailand has already made a reservation at the 7th session of TFAMR concerning the Principles on the use of antimicrobials in specific circumstances, Principle 5 "...Antimicrobial agents that are not considered medically important should not be used for growth promotion unless potential risks to human health have been evaluated through procedures consistent with the Guidelines for Risk Analysis of Foodborne Antimicrobial Resistance".

Thailand would still like to ensure that antimicrobial agents are used prudently and responsibly. The use of antimicrobial growth promoters in the food-producing animals should not be used in any circumstance. Thus, we would like to express our reservation on Principle 5.

Agenda Item 8 Proposals for New Work

CCASIA

Proposal for the development of a regional standard for soybean products fermented with *Bacillus* species

Thailand agrees with the proposal for the development of a regional standard for soybean products fermented with *Bacillus* species.

Proposal for the development of a regional standard for quick frozen dumpling

Thailand agrees with the approval of the proposal for the development of a regional standard for quick frozen dumpling and is pleased to support information and comments.

Proposal for the development of a regional standard for cooked rice wrapped in plant leaves

Thailand supports the proposal for the development of a regional standard for cooked rice wrapped in plant leaves.

CCFH

New work on guidelines for the safe use and reuse of water in food production

Thailand has no objection for the new work on guidelines for the safe use and reuse of water in food production.

CCFFP**Proposal for the amendment of the Standard for Canned Sardines and Sardine-Type Products (CXS 94-1981): inclusion of *Sardinella lemuru* (Bali Sardinella) in the list of *Sardinella* species under sec. 2.1**

Thailand has no objection for the new work (proposed by the Philippines) on amending the “Standard for Canned Sardines and Sardine-Type Products (CXS 94-1981): inclusion of *Sardinella lemuru* (Bali Sardinella).

CCPR**Priority lists of pesticides for evaluation by JMPR in 2021**

In order to continue JMPR and CCPR works, Thailand therefore agrees with the Priority lists of pesticides for evaluation by JMPR in 2021.