

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX ALIMENTARIUS COMMISSION
Forty-third Session
PROPOSALS FOR NEW WORK

FAO/WHO Coordinating Committee for Africa
Comité FAO/OMS de coordination pour l'Afrique
Comité Coordinador FAO/OMS para África

Proposal for new work to elaborate guidelines for supporting the development of harmonised food laws for the CCAFRICA region

Comments from Mali and Nigeria

Mali

Position du Mali: Le Mali soutient la proposition de nouveaux travaux.

Justification: Compte tenu de la diversité des instruments législatifs et des systèmes juridiques dans les pays de la région, des différents niveaux de développement de la législation sur la sécurité sanitaire des aliments, ainsi que des capacités de mise en œuvre dans les pays reconnaît la nécessité d'élaborer des " directives relatives l'harmonisation de la législation sur denrées alimentaires dans la région couverte par le CCAFRICA". L'élaboration de directives contribuera à faciliter le commerce entre les pays africains.

Nigeria

Nigeria supports proposal to commence new work to elaborate Guidelines for Supporting the Development of Harmonised Food Laws for the CCAFRICA Region.

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

- Proposal for the development of a regional standard for soybean products fermented with *Bacillus* species (REP20/ASIA, Para. 97 (i), Appendix V)
- Proposal for the development of a regional standard for quick frozen dumpling (REP20/ASIA, Para. 102 (i), Appendix VI)
- Proposal for the development of a regional standard for cooked rice wrapped in plant leaves (REP20/ASIA, Para. 112 (i), Appendix VII)

Comments from Philippines

The Philippines supports the proposal for the development of regional standards for these three new works as these commodities are marketed in the country.

**Committee on Food Hygiene
Comité sur l'hygiène alimentaire
Comité sobre Higiene de los Alimentos**

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

Comments from Mali and Philippines

Mali

Position du Mali: Le Mali soutient la proposition de nouveaux travaux sur les directives de sécurité sanitaire pour l'utilisation et le recyclage de l'eau dans la production des aliments.

Justification: L'eau est un élément essentiel dans la production et la transformation des aliments, elle peut être utilisée comme ingrédient, pour laver les aliments et dans de nombreuses autres applications. Si l'eau n'est pas salubre, elle peut être un vecteur de transmission d'agents pathogènes et d'autres contaminants, d'où son impact potentiel sur la santé publique.

L'utilisation judicieuse d'une eau saine et de qualité est essentielle pour garantir la santé publique et la durabilité de la production alimentaire. D'où la nécessité d'un document harmonisé et l'importance de directives relatives à la sécurité sanitaire dans l'utilisation de l'eau le long de la chaîne alimentaire.

The Philippines

The Philippines supports to forward the project document on guidelines for the safe use and reuse of water in food production as New Work.

**Committee on Fish and Fishery Products
Comité sur les poissons et les produits de la pêche
Comité sobre Pescado y Productos Pesqueros**

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

Comments from Morocco and Philippines

Morocco

Le Maroc propose :

- La demande d'inclusion de *Sardinella lemuru* dans la norme sur les sardines et produits du type sardines en conserve (CXS 94-1981) doit se faire dans le respect strict des dispositions de la procédure d'inclusion de nouvelles espèces dans les normes pour les poissons et les produits de la pêche (section II) du manuel de procédure du Codex Alimentarius (page 76 - 27ème Edition) ;
- La réactivation du Comité du Codex sur le poisson et les produits de la pêche (CCFFP) qui peut évaluer si la norme sur les sardines et produits du type sardines en conserve (CXS 94-1981) peut être amendée de façon à y inclure *Sardinella lemuru* (sardinelle de Bali) dans la liste d'espèces de sardinelles inscrites à la section 2.

Philippines

The Philippines proposes to amend the Standard for Canned Sardines and Sardine-Type Products (CXS 94-1981). The purpose of the amendment is to provide the member countries and the sardine canning industry (producers and traders) a revised list of sardine-type fishes authorized for the preparation of canned sardine and sardine type products to include *Sardinella lemuru* or Bali Sardinella.

The scope of the amendment shall focus on the inclusion of *S.lemuru* in the list of sardine-type fishes authorized for the preparation of canned sardine and sardine-type products taking into account the issue on fair trade practice. Product authenticity, traceability and sustainability of their sources shall be addressed to

ensure compliance of the requirements in the international markets. The proposal intends to revise Section 2.1 of the Codex standard for canned sardine and sardine-type products, CXS 94-1981.

General Comments

The Philippines would like to express appreciation for the support of Australia, Canada, Cuba, Iraq, Mexico, Morocco, Norway, Thailand, USA and CCTA on the proposed amendment of the Standard for Canned Sardines and Sardine-Type Products to add *Sardinella lemuru* to the list of species under Section 2.1

Specific Comments

Australia

Labelling

xx.The proposed amendment seeks to add the species *S. lemuru* to the list of species that are covered by the Codex standard and use the term ‘X sardines’ on the labelling of canned product. Where “X” is the name of a country, geographic area, the species, or the common name of species, or any combination of these elements in accordance with the law and custom of the country in which the product is sold, and in a manner not to mislead the consumer. xx

The Philippines supports the suggestion of Australia and proposes the name: “PHILIPPINES SARDINES”

This is to ensure compliance of the requirements in the international markets taking into account the product authenticity, traceability and sustainability of the resources.

Brazil and Chile*

Sensory Evaluation

According to the Procedural Manual, the proposing member must propose the sensory evaluation of the final product with the required species by comparing it with three of the most representatives species on the market as well as three laboratories to accomplish the three sensory evaluation. Only after the availability of these results it will possible to Brazil to present a position. xx

The Philippines supports the recommendation of Brazil and Chile and provides available sensory evaluation data on *S. lemuru* and other species listed in CXS 94-1981. Sec 2.1.1.

1. Cooked (steamed) whole fish

The colour of *S. lemuru* is brownish cream which is similar to *S. gibbosa*.

In terms of texture, both samples of *S. lemuru* and *S. gibbosa* are firm and juicy.

There is no significant difference ($\alpha=0.05$) detected in other attributes of *S. lemuru* and *S. gibbosa* (Table 1)

Table 1. Rated attributes and mean scores (source: DA-NFRDI, Philippines)

Parameter	<i>S. lemuru</i>	<i>S. gibbosa</i> (1)	<i>S. gibbosa</i> (2)
Discoloration	0.9	0.9	1
Fresh fish odor**	0.4	0.5	0.6
Fishy-like odor	2.5	2.1	2.1
Sour-like odor	0	0	0
Off-odor	0	0	0
Fresh fish flavor**	0.9	0.9	1.1
Fishy-like flavor	1.9	1.2	2.1
Sour-like flavor	0	0	0
Off-flavor	0	0	0

**seaweed-like

0 = None; 1 = Threshold; 2 = Very slight; 3 = Slight; 4 = Slight-moderate; 5 = Moderate; 6 = Moderate-strong; 7 = Strong

2. Canned *S. lemuru* in tomato sauce

All brands (A,B,C) have firm and slightly juicy texture

There is no significant difference ($\alpha=0.05$) detected in other attributes of brands of canned *S. lemuru* in tomato sauce (Table 2).

Table 2. Rated attributes and mean scores (source: DA-NFRDI, Philippines)

Parameter	Brand of canned <i>S. lemuru</i> in tomato sauce		
	A	B	C
Characteristic sardine in tomato sauce odor	3.8	3.9	3.6
Fishy-like odor	0.5	0.1	0.5
Other off-odors	0	0	0
Characteristic sardine in tomato sauce flavor	3.8	4	4
Fishy-like flavor	0.4	0.2	0.6
Itchy mouthfeel	0	0	0
Off-flavor	0	0	0

0 = None; 1 = Threshold; 2 = Very slight; 3 = Slight; 4 = Slight-moderate; 5 = Moderate; 6 = Moderate-strong; 7 = Strong

*Similar comment from Chile in Spanish as interpreted by Codex Secretariat

Brazil

Sustainable Fishing

xx concerned that this species is a sustainable fishing, given the information about the decrease in catches of this species that led to the Philippine Government's determination of a defense period from 2011.

The Philippines promotes sustainable fishing on sardines given the following stocks indicators and government interventions:

1. Impact of Management Measures

Since the Philippine government's implementation of the closed fishing season for sardines which began in 2011, there are indications that the stocks have already increased. An independent impact assessment study showed positive effects of the yearly, three month closure (during the sardines' spawning season) as there were increases in the landed catch of sardine species, high value non-sardine species, and of income of fishing crew and canning factory workers (Rola et al., 2018).

2. Exploitation value

The Exploitation values for *S. lemuru* were computed at **0.51**, below the recommended **0.6** threshold (Santos et al., 2017).

3. Sardine Management related policies/Plan

As cited in Sec. 3.1b para 2 of the project document, the Philippine Government has introduced management measures to ensure the sustainability of sardine production in the country, namely:

- Joint Administrative Order No 1 s 2011. A three-month per year closed fishing season particularly during the spawning months has been imposed in major sardine fishing areas such as Sulu Sea, Basilan Strait and Sibuguey Bay in Mindanao;
- Fisheries Administrative Order 255 s. 2014. Establishing Closed Season for the Conservation of Sardines in East Sulu Sea, Basilan Strait and Sibuguey Bay (Mindanao);
- Memorandum Circular 2008-59. Policies and Guidelines on the Regulation and Monitoring of Fishery Activities in Municipal Waters;
- Fisheries Administrative Order No 155. Regulating the use of fine mesh nets in fishing;
- Fisheries Administrative Order No 155-1. Amending Section 2 of FAO No 155, regulating the use of fine mesh net in fishing;
- Fisheries Administrative Order No 167 (1-3). Establishing a close season for the conservation of sardines and herrings and mackerels in the Visayan Sea;
- Fisheries Administrative Order No 198. Rules and Regulations on Commercial Fishing. Requirement for a Catch Documentation;
- Fisheries Administrative Order No 201. Ban on Fishing with Active Gears; and
- Fisheries Administrative Order No 233/BFAR Circular No 253. Moratorium on the issuance of new Commercial Fishing Vessel and Gear License as part of a precautionary approach to fisheries management.

In addition to the implementation of strict regulations toward responsible fishing, the draft National Management Framework, 2019-2024 (DA-BFAR, 2020) has been approved and is currently being implemented with the following goals:

- Improved Science –based indicators for the sustainability of sardine stocks;
- Improved distribution of benefits among sardine fisherfolk and communities; and
- Strengthened science-based management for sustainable sardine fisheries.

European Union and Chile*

Volume of fish stocks

xx. The EU considers that before proceeding with the proposed in the above mentioned CL, in accordance with the procedure for the inclusion of additional species in Codex standards for the fish and fishery products, the Philippines should provide an estimate of the volume of stocks present in the natural environment. This is particularly relevant, since *Sardinella lemuru* is included in the “IUCN Red List of Threatened Species”. xx

The Philippines supports the recommendation of EU and Chile. In lieu of the estimate on the volume of sardine stocks in the natural environment, the Philippines uses other forms of *Reference Points* to monitor the stock including Catch Per Unit Effort (CPUE), species composition, Spawning Potential Ratio (SPR), Catch-Maximum Sustainable Yield (CMSY), etc. as per Republic Act 10654**.

Reference Points – means benchmark values often based on indicators such as fishery stock size or the level of fishing that serves as standard to compare estimates of a fishery stock size and fishing mortality over time depending on the biological characteristics of the species. Reference points can mark: (a) a *limit* or a level that should be avoided; (b) a *target*, which should be achieved and maintained; or (c) a *trigger* that signals the need to take prescribed actions.

In addition to sec 3.1b paragraph 2 of the project document, updated figures of the Philippine Statistics Authority, PSA (DA-BFAR, 2020) have shown stability after management interventions, i.e. Seasonal Closure in Zamboanga Peninsula, the leading producer of sardines (Figure 1).

*Similar comment from Chile in Spanish as interpreted by Codex Secretariat

**Republic Act 10654 An act to prevent, deter and eliminate illegal, unreported and unregulated fishing, amending Republic Act. 8550, Otherwise known as “The Philippine Fisheries Code of 1998,” and for other purposes.

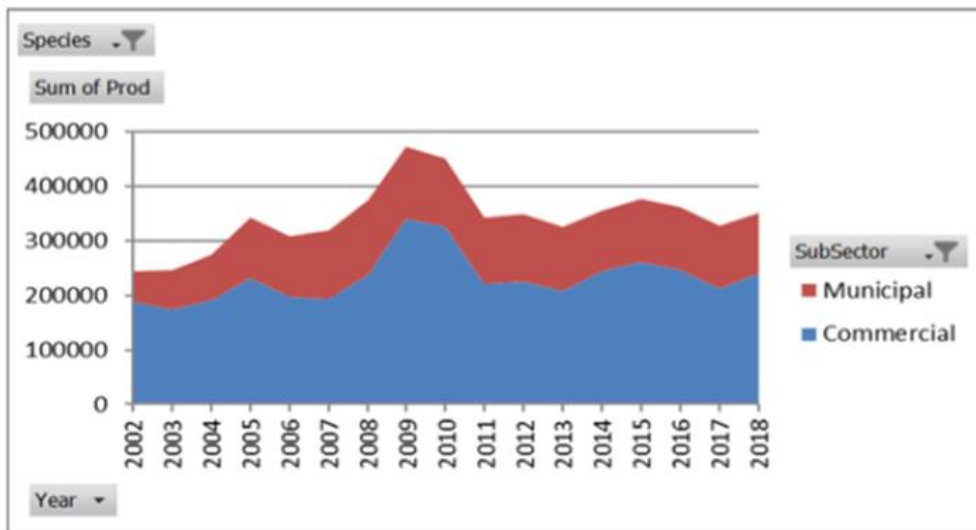


Figure 1. Commercial and Municipal Sardine Production 2002-2018

The latest results of the National Stock Assessment Program (NSAP) in Zamboanga attest to the stability of sardine production (Figure 2)

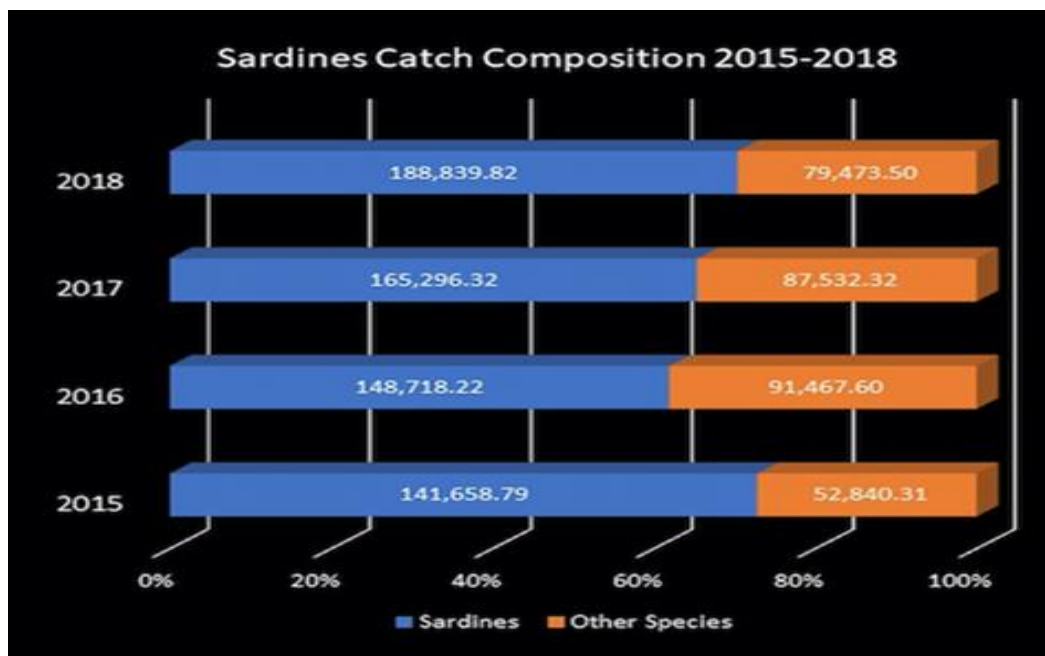


Figure 2. Sardine Production in Zamboanga 2015-2018.

IUCN Report

It is important to note that the IUCN Red List assessment was conducted in 2017 and failed to cover 2018 statistics which showed significant yearly increase in sardine production from 2015.

Increase in canned sardine production

A number of positive indicators have been observed in the sardine stocks since 2017 up to the present including increased capacity in canning from 1 Million cans/day during its peak season in 2011 to 5 Million cans/day during peak season in 2019 (pers. Comm., Edgar C. Lim, Manager, Permex Producer and Exporter Corporation, Zamboanga City, Philippines).

European Union

Total Fat, Flavour and Size

xx. Equally, information should be given on the fat content, taste and size of *S. lemuru*, as these parameters should not differ from ones of the approved species of sardines currently listed in the relevant Codex standard.

The Philippines provides information on the total fat content, flavour and sizes of *S. lemuru* which are comparable with other species listed in the CXS 94-1981 sec 2.1.1

Table 3. Total Fat Content of *Sardinella* Species

<i>Sardinella</i> spp.	Mean Total Fat (%)	Reference
<i>S. lemuru</i>	4.7	DOST-FNRI, 1997)
<i>S. gibbosa</i>	4.3	Suseno SH, et al. (2014)
<i>S. gibbosa</i>	5.8	Vijayakumar N, et al. (2014)
<i>S. longiceps</i>	6.3	Vijayakumar N, et al. (2014)
<i>S. longiceps</i>	11.7	Sudhakaran R, et al. (1985)
<i>S. longiceps</i>	10.30	Krishnakumar S, et al. (1985)
<i>S. longiceps</i>	7.0	Bykov VP. (1985)
<i>S. longiceps</i>	6.0	Palanikumar M, et al. (2014)
<i>S. longiceps</i>	10.1	Bahurmiz OM, et al. (2017)
<i>S. aurita</i>	1.24	Diouf N, et al. (1982)
<i>S. aurita</i>	1.2-19.7	Bykov, VP (1985)
<i>S. aurita</i>	3.4	Bykov, VP (1985)
<i>S. aurita</i>	3.3	Christiansen SM. (2018)
<i>S. maderensis</i>	2.3	Christiansen SM. (2018)

Steamed *S. lemuru* is comparable with *S. gibbosa* in terms of **fresh fish flavour** (seaweedy-like), with mean scores of 0.9 and 1.0, respectively, interpreted as threshold - just detectable/not readily recognizable (source: DA-NFRDI, Philippines)

Table 4. Average length of *Sardinella* Species

<i>Sardinella</i> spp.	Average length (cm)	Reference
<i>S. lemuru</i>	12.74 – 15.31	Ignacio D. (2019)
<i>S. lemuru</i>	20.0	Willette et al. (2011)
<i>S. lemuru</i>	13.6	Palermo et al. (2020)
<i>S. lemuru</i>	9.7-20.2	Pertami et al. (2018)
<i>S. gibbosa</i>	15.0	Willette et al. (2011)
<i>S. gibbosa</i>	10.8	Stern et al. (2015)

<i>S. aurita</i>	13.1	Ofori-danson et al. (2018)
<i>S. aurita</i>	21.5	Amponsah et al. (2017)
<i>S. maderensis</i>	15.1	Patrick et al. (2018)
<i>S. maderensis</i>	23.6	Amponsah et al. (2018)
<i>S. maderensis</i>	12.1	Ogunola and Onada (2017)
<i>S. longiceps</i>	16.0 – 20.0	Deshmukh et al. (2010)
<i>S. longiceps</i>	12.0-20.0	Thomas and Hridayanathan (2002)

Egypt

xxEgypt would like to express the opposition of including *S. lemuru* (Bali sardinella) in the list of sardinella species under Sec. 2.1.1 in the Codex Standard for canned sardines and sardine-type products (CXS 94-1981).

The Philippines would like to make inquiry on the specific reasons why Egypt opposes the proposal.

CCTA

Editorial work done on the manuscript.

The Philippines appreciates and supports the editorial work made by the CCTA.

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Committee on Pesticide Residues
Comité sur les résidus de pesticides
Comité sobre Residuos de Plaguicidas

Priority lists of pesticides for evaluation by JMPR in 2021 (CX/PR 20/52/19, Appendices I and II, CX/EXEC 20/79/2-Add.1, Appendix 3

Comments from Philippines

The Philippines supports to undertake the proposals for new work to conduct evaluation of following specific compounds/pesticides in the priority lists for evaluation by JMPR in 2021 and elaborate new standards and related texts.

1. afidopyropen

2. azoxystrobin
3. benzovindiflupyr
4. benzpyrimoxan
5. bifenthrin
6. broflanilide
7. chlormequat
8. cyprodinil
9. dinotefuran
10. ethiprole
11. famoxadone
12. fenazaquin
13. fenhexamid
14. fluazaindolizine
15. fludioxonil
16. fluindapyr
17. fluopyram
18. flutriafol
19. imazalil
20. indoxacarb
21. isoflucypram
22. mancozeb
23. mandipropamid
24. mefentrifluconazole
25. methoxyfenozide
26. pendimethalin
27. piperonyl butoxide
28. pyrethrins
29. quinoxifen
30. spinetoram
31. tricyclazole

The Philippines will not support the JMPR review of the following compounds in 2021 such as clofentezine, pyraclostrobin and hexythiazox.

Rationale

There are many pesticide active ingredients in the priority lists for 2021 JMPR for evaluation that are not registered in the Philippines since these compounds are new and still subject for application process at the Fertilizer and Pesticide Authority to be registered for use in the Philippine agriculture as shown in the Table 1 below. The results of said evaluation could be used by the Philippines as basis whether a certain pesticide active ingredient will be safe to be used in the Philippine agriculture. The following are the status of pesticide registration in the Philippines at the Fertilizer and Pesticide Authority that are included in the priority lists of pesticides for evaluation by JMPR in 2021.

Table 1. Status of Registration of Pesticide in Priority Lists

Pesticide	Status of Registration in the Philippines (Yes/No)
afidopyropen	No
benzovindiflupyr	No
benzpyrimoxan	No
broflanilide	No
chlormequat	No
cyprodinil	No
ethiprole	No
fenhexamid	No
fluazaindolizine	No
fludioxonil	No
fluindapyr	No
isoflucypram	No
mefentrifluconazole	No
methoxyfenozide	No
Piperonyl butoxide	No
pyrethrins	No
quinoxifen	No
tricyclazole	No

The Philippines poses no objection for the JMPR review in 2021 of the following compounds that are already registered in the country as shown in Table 2 below.

Table 2. Status of Registration of Pesticide in Priority Lists

Pesticide	Status of Registration in the Philippines (Yes/No)
azoxystrobin	Yes
bifenthrin	Yes
dinotefuran	Yes
famoxadone	Yes
fenazaquin	Yes
fluopyram	Yes
flutriafol	Yes
imazalil	Yes
indoxacarb	Yes
mancozeb	Yes
mandipropamid	Yes

pendimethalin	Yes
spinetoram	Yes

The possible 2021 JMPR evaluation reports on MRLs for those compounds in the Priority list of pesticides for new uses and other evaluations are important scientific data to be used as the allowable crop-pesticide residues for the purpose of pesticide product registration and safety consideration. This is also in line with the provisions stated under the Philippines governing law for pesticide registration. Pursuant to Pesticide Regulatory Policies and Implementing Guidelines pesticide registration shall not be granted without a proposed MRL to cover residues of the pesticides in each commodity for which registration is requested. In the absence of local MRLs, the agency shall adopt the CODEX MRLs or other internationally accepted standards.

The Philippines will not support the JMPR review of the following compounds in 2021 such as clofentezine, pyraclostrobin and hexythiazox. In reference to the CAC43 agenda item no. 9, these three (3) compounds are under the priority lists that have been submitted with pesticide trials for their MRLs with three specific crops. The Clofentezine residue will be evaluated with hops. The Pyraclostrobin residue is nominated to be evaluated with ginseng. The Hexythiazox residue will be evaluated with raspberry. The pesticide-crop combination review of these three (3) compounds are irrelevant to the Philippines unless they will be imported and there will be significant dietary risk for consumers arising from the consumption of those crops, or products derived from them.