

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 9, 10 and 12

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Comments of Iran (Islamic Republic of)

AGENDA ITEM 9

Food additive provisions for the Regional Standard for Doogh

Para. 3.2 (i) Based on the descriptors of food categories in the GSFA, Doogh (plain, not heat treated) is under FC 01.2.1.1, Doogh (Regional Standard) (plain, heat treated) is under FC 01.2.1.2 and Doogh (flavoured, heat treated and not heat treated) is under FC 01.1.4.

Para. 3.2 (ii) FC 01.2 is listed in the annex to table three which means the use of the food additives in this food category is governed by the provisions in Tables One and Two; however, as indicated in the footnote in the annex, ~~acidity regulators~~ packaging gases, stabilizers and thickeners listed in Table 3 are acceptable for use in fermented milks, heat treated after fermentation, as defined in the Standard for Fermented Milks (CXS 243-2004) that correspond to food category 01.2.1.2 "Fermented milks (plain), heat treated after fermentation".

Para. 3.3 (i) Make a general reference to the GSFA as follows: ~~Acidity regulators, colours, emulsifiers, [Glassing agents/carbonating agents, preservatives, stabilizers, sweeteners and thickeners used in accordance with Tables 1 and 2 of the General Standard for Food Additives (CXS 192-1995) in food categories 01.1.4 (Flavoured fluid milk drinks), 01.2.1.1 (Fermented milks (plain), not heat-treated after fermentation) and 01.2.1.2 (Fermented milks (plain), heat-treated after fermentation) or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.~~

Flavorings

The flavorings used in products covered by this standard should comply with the Guidelines for the Use of Flavorings (CXG 66-2008).

Please note that natural flavour (mint, thyme) and nature identical can be used for this product. The table on page 3 of document CX/NE 19/10/12 should consequently be deleted.

AGENDA ITEM 10

Draft regional standard for mixed zaatar

Iran thanks Lebanon for preparing the draft regional standard for mixed (CX/NE 19/10/13). The submitted draft was reviewed and the following suggestions are made:

- Wrong title selected. Selecting this title seems to include a mixture of different species of Zaatar, while being mixed with other plant species and food additives according to section 2.2 and 3.1.2. It is suggested that the title changes to Zaatar flavouring mix.
- Please delete phrase "such as Lebanese mankoushe, etc."
- The type of product is not clear, it seems to be the type of powder, so it should be explicitly stated in the title.
- In section 1, because of pointed to purpose and application, it suggested that the title of this section changes to "purpose and scope".
- Section 1, it is better to change to: "The purpose of this standard is to determine the characteristics, analysing, sampling, packaging and marking of Zaatar which is used as flavouring."
- In section 2.1, it is better to explain a little about the plant of Zaatar.

- Please change the section 2.1.1 with 2.1.2, it is better first explain about raw Zaatar then mixed Zaatar.
- In section 2.2.4, “any form of the product” is unclear. If it means 3 kinds of classifications, this section must be deleted.
- In section 2.1, it is better to point to foreign material (belong to environment and plant) and Unacceptable and explain about them.
- In section 3.2.1, it is better to have 2 sub-section: 3.2.1.1 taste and 3.2.1.2 color.
- In section 3.2.1, it is better to have a footnote about food color:” Adding any artificial color is not allowed. ”
- In section 3.2.2.1.1, it is better to have 4 sub-section, because they are very important: 3.2.2.1.1.1 raw material, 3.2.2.1.1.2 unacceptable, 3.2.2.1.1.3 appearance and 3.2.2.1.1.4 foreign material.
- In table 1, in row 2, please delete “total table” from phrase “total table salt”, it is better changes to “salt”, because we determine salt by chlorimetry method, but if there is a method that determine only added salt it is Ok.
- In section 4.1, “No food additives are permitted” is wrong because salt is a kind of food additive that is permitted in premium and extra type according to section 2.2.1 and 2.2.2.
- In section 4.2, salt must be added to table with maximum level of 7% or 70 g/kg.
- In section 4.2, the table must have the title and number.
- In section 7.1.1, the name is wrong, it must be changes to Zaatar flavouring.
- Section 7.1.3 must be deleted because in section 2.1.2 clearly point to different kinds of species.
- The title of section 7.1 must be changes to “Labelling of retail packages”, then point to name of product, ... as sub-sections.
- Please include a section to refer to the storage conditions.
- The table in section 8.1 must have the title and number.
- In the table of the section 8.1, pointed to “water insoluble ash” while in table 1, there is no quantity for it.
- In the table 1, pointed to basic components, while there is no method for examine it.
- In the section 8, it is better to explain the methods of examination because of Lack of access to the sources cited.
- It should be clear Isomer type (D or L-malic acid) of Malic acid. also the rate of malic acid to citric acid should be mentioned.

AGENDA ITEM 12

Discussion paper on the development of a standard for halal products

The Islamic Republic of Iran would like to express its appreciations for Egypt active participation at Codex in both regional and global levels. with regard to the discussion paper on the development of a standard for Halal Products CX/NE 19/10/15- Agenda Item 12, that prepared by Egypt , we would like again to draw your attention to the following points:

- Halal Standards are not regional standards. At the moment, there are 57 members of the Organization of Islamic Cooperation, while only 17 of them are members of CCNEA, that means majority of Muslim countries are out of our region and having the right to be involved. So regional approaches to determining of the criteria for Halal will open doors of disagreements between different regions and endanger the integrity and convergence towards reaching a unified global Halal standard.
- Based on CCFL43 Report it was noted that codex is not a right platform for developing religious standards particularly Halal standards, while the proper platform was expressed by a number of delegations as the Standards and Metrology Institute for the Islamic Countries (SMIIC).
- Any work in Codex on halal food should take into account the standards and related texts developed at the level of Islamic countries in particular the Organization of Islamic Cooperation (OIC) / Standards and Metrology Institute for Islamic Countries as reference (SMIIC) as reference documents. Iran strongly believes that development of any halal standards at Codex should be halted and be developed solely at SMIIC.