

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 3,4,5,6,7,8,10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

40th Session

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(Comments of Gambia)

GENERAL COMMENT

Gambia appreciates the opportunity to comment on the following agenda items.

Agenda Item 3 Reports of the FAO/WHO Coordinating Committees REP/17/AFRICA

BACKGROUND: The 22nd Session of CCAFRICA recommended the following standards for adoption by CAC40:

- Regional Standard for Unrefined Shea Butter (Proposed Draft) (REP17/AFRICA, Para. 78, Appendix III) at Step 5/8
- Regional Standard for Fermented Cooked Cassava Based Products (Proposed Draft) (REP 17/AFRICA, Para. 74, Appendix II) at Step 5
- Regional Standard for Gnetum Spp leaves (Proposed Draft) (REP17/AFRICA Para. 83, Appendix IV) at Step 5

COMMENT:

Gambia supports the adoption at Step 5/8 and Step 5 of the three standards.

RATIONALE: The products are widely traded in Africa. Regional standards for these commodities will therefore facilitate and boost intra-regional trade.

Agenda Item 4(CX/CAC 17/40/2) Amendments to the Procedural Manual

Principles for the Establishment of Codex Methods of Analysis REP17/MAS para. 36, Appendix III

BACKGROUND: CCMAS is proposing to amend Note 2 in the Principles for the Establishment of Codex Methods of Analysis (Codex Procedural Manual, Section II, p. 80 in the 25th Ed.) by adding the statement:

There are numerous ways in which methods and limits that involve a sum of components can be converted into methods performance criteria, but this should be undertaken with care on a case-by-case basis.

COMMENT:

Gambia recommends that CAC40 approves amendment to Note 2 in the Principles for the Establishment of Codex Methods of Analysis (Codex Procedural Manual, Section II, p. 80 in the 25th Ed.) to include provision on how “sum of components” could be converted to performance criteria.

RATIONALE: This will provide uniform guidance to countries on how performance criteria for sum of components can be derived.

Agenda Item 5(CX/CAC 17/40/3) Final adoption of Codex Texts

Part 1 – Standards and related texts submitted for adoption

Draft standards and related texts submitted at Step 8

STANDARD FOR CUMIN (DRAFT) (REP17/SCH PARA. 38, APPENDIX II) STEP 8

BACKGROUND: This Standard applies to cumin offered for direct consumption, as an ingredient in food processing, or for repackaging if required. It excludes cumin intended for industrial processing.

POSITION: Gambia does not object to the adoption of the standard for cumin at Step 8.

STANDARD FOR THYME (DRAFT) (REP 17/SCH PARA. 38, APPENDIX III) STEP 8

BACKGROUND: This Standard applies to dried thyme offered for direct consumption, as an ingredient in food processing or for repackaging if required. It excludes dried thyme intended for industrial processing. It excludes cumin intended for industrial processing.

POSITION: Gambia does not object to the adoption of the standard for thyme at Step 8.

Proposed draft standards submitted at Step 5 with the recommendation of the subsidiary body concerned for the omission of Steps 6 and 7 (Step 5/8).

PROPOSED DRAFT MRLS FOR: LASALOCID SODIUM (CHICKEN, TURKEY, QUAIL AND PHEASANT KIDNEY, LIVER, MUSCLE, SKIN+FAT) (78TH JECFA); IVERMECTIN (CATTLE FAT, KIDNEY, LIVER, MUSCLE) (81ST JECFA); TEFLUBENZURON (SALMON FILLET, MUSCLE) (81ST JECFA); REP 17/RVDF PARAS. 60, 62, AND 66, APPENDIX IV) STEP 5/8

BACKGROUND

- 81st JECFA reaffirmed the proposed MRL recommended by the 78th JECFA for lasalocid sodium in Chicken, turkey, quail and pheasant kidney, muscle, skin + fat)
- The 81st JECFA recommended MRL for ivermectin in cattle fat, kidney, liver muscle
- The 81st JECFA recommended MRL for teflubenzuron in salmon fillet, muscle

POSITION: The Gambia supports the adoption of the MRLs of lasalocid, ivermectin and teflubenzuron at step 5/8.

RATIONALE: Risk assessment by JECFA did not indicate intake concerns from dietary exposure to the three veterinary drugs.

PROPOSED DRAFT REVISION OF THE CODE OF HYGIENIC PRACTICE FOR FRESH FRUITS AND VEGETABLES (CAC / RCP 53-2003) (REP 17/FH, PARA. 36, APPENDIX III) STEP 5/8

BACKGROUND: The CCFH noted that all outstanding issues including amendment to paragraph 36: "Agricultural workers applying agricultural chemicals should receive training on appropriate application and safety procedures"

POSITION: Gambia supports the adoption of the Code of Practice at Step 5/8

RATIONALE: The Code addresses Good Agricultural Practices (GAPs) and Good Hygienic Practices (GHPs) for controlling microbial, chemical and physical hazards associated with all stages of the production of fresh fruits and vegetables, from primary production to consumption.

NRV-R FOR VITAMINS D AND E AND CONVERSION FACTORS FOR VITAMIN E EQUIVALENTS FOR LABELLING PURPOSES IN THE GUIDELINES ON NUTRITION LABELLING (CAC / GL 2-1985 (REV 1-1993) REP17/NFSDU PARAS. 26 and 28, 36, Appendix II at Step 5/8 and 8

- CAC39 adopted the NRV for vitamin E at step 5 noting the need to agree on conversion factors before finalization of NRVs. CCNFSDU30 adopted NRV for vitamin E of 9 mg per day and proposed a conversion factor of 1mg of α -tocopherol as a vitamin-equivalent (vitamin) for vitamin E.
- CCNFSDU38 adopted NRV-R for Vitamin D of 5-15 μ g/day with a footnote ('based on minimal sunlight exposure throughout the year') that leaves it to the competent national authorities to determine the appropriate NRV-R based on exposure to the sun.

POSITION AND RATIONALE: The Gambia supports the adoption of NRV-R for Vitamin D and E as these values reflect current state of the knowledge.

STANDARD FOR BLACK, WHITE AND GREEN (BWG) PEPPER (PROPOSED DRAFT) (REP 17/SCH PARA. 42, APPENDIX IV) STEP 5/8

BACKGROUND: This standard applies to Black, White and Green peppers (abbreviated as BWG) offered for direct consumption, as an ingredient in food processing or for repackaging if required. It excludes BWG peppers intended for industrial processing.

POSITION: Gambia does not object to the adoption of the standard for black, white and green pepper at Step 5/8.

SPECIFICATIONS FOR THE IDENTITY AND PURITY OF FOOD ADDITIVES (PROPOSED DRAFT): AMENDMENTS TO THE LIST OF CODEX SPECIFICATIONS FOR FOOD ADDITIVES (CAC/MISC 6) (REP17/FA PARA. 41, APPENDIX III, PART A) STEP 5/8

BACKGROUND: The CCFA is submitting proposed draft specifications for identity and purity of food additives arising from the 82nd JECFA meeting to CAC40 for adoption at Step 5/8.

POSITION: Gambia supports the adoption at CAC 40.

RATIONALE: JECFA, as the risk assessment body for the CAC on food additives, contaminants and residues of veterinary drugs in food, conducted evaluations on the additives and advised that they were of adequate food grade quality.

DRAFT AND PROPOSED DRAFT FOOD ADDITIVE PROVISIONS OF THE GENERAL STANDARD FOR FOOD ADDITIVES (GSFA) AT STEPS 8 AND 5/8 (REP 17/FA PARAS. 72, 108(I) AND APPENDIX VI PART A) STEPS 8 AND 5/8

BACKGROUND: JECFA assigned acceptable daily intake and international numbering systems to various food additives for inclusion in the General Standard for Food Additives (GSFA). The additive provisions are being proposed for adoption at Step 8 and Step 5/8 by CAC40 for their subsequent inclusion in the GSFA. The GSFA is recognized as the single most authoritative reference for all food additives.

POSITION: The Gambia supports the adoption of the draft and proposed draft food additives provisions

RATIONALE: JECFA as the risk assessment body for the CAC on food additives, contaminants and residues of veterinary drugs in food conducted an assessment and advised that the food additives did not present dietary intake concerns.

PROPOSED DRAFT REVISION OF THE CLASS NAMES AND THE INTERNATIONAL NUMBERING SYSTEM FOR FOOD ADDITIVES (CAC/GL 36-1989) (REP17/FA PARA. 117(I), APPENDIX X) STEP 5/8

BACKGROUND: The CCFA agreed to forward the proposed draft amendments to the INS to CAC40 for adoption at Step 5/8 (Appendix X). The INS provides a unified and simple coding system for identifying food additives that may be food in the list of ingredients.

POSITION: The Gambia supports the adoption at step 5/8 of amendments to INS by CAC 40.

RATIONALE: To ensure harmonization of class names and INS for food additives.

Part 2 – Standards and related texts held at Step 8 by the Commission

DRAFT MRLS FOR BOVINE SOMATOTROPIN (ALINORM 95/3, APPENDIX II), HELD AT STEP 8 BY 23RD CAC, (ALINORM 03/41, PARA. 34)

BACKGROUND: Following the request made at the thirty fifth session of the CAC regarding the re-assessment of rbSTs, JECFA conducted an extensive literature review. According to the JECFA report, there would be no more cases of mastitis in cows treated with rbSTs than those untreated. It was recalled that Codex should base its decisions on sound science and that, in the case of rbSTs, all available scientific information had been properly considered by JECFA.

POSITION: Having reviewed the report based on the questions forwarded to JECFA 78 by CAC35, The Gambia supports adoption of rbSTs at step 8.

RATIONALE: Based on a systematic review of the literature published since the last evaluation, JECFA reaffirmed its previous decision on the ADI “not specified” for somagrove, sometribove, somavubove and somidobove.

Agenda Item 6 (CX/CAC 17/40/5) ADOPTION OF CODEX TEXTS AT STEP 5

PROPOSED RMR FOR GENTIAN VIOLET (PROPOSED DRAFT) REP17/RVDF PARA. 50, APPENDIX II) STEP 5

BACKGROUND: CCRVDF22 recommended the establishment of a Risk Management Recommendations (RMR) for gentian violet following risk assessment by the 78th JECFA (2013). However, there were divergent views as to whether the inclusion of the last sentence of the RMR on the example of a risk mitigation measure to prevent residues of gentian violet in food (e.g. the non-use of this compound in food producing animals) should be part of the RMR. In view of this, the Committee circulated both options (i.e. with and without the example) at Step 3 for further consideration at CCRVDF23 (2016).

POSITION: The Gambia supports the proposed risk management recommendation presented as Option 1 in Codex document REP15/RVDF (Appendix III) as follows:

In view of the JECFA conclusions on the available scientific information, there is no safe level of residues of gentian violet or its metabolites in food that represents an acceptable risk to consumers. For this reason, competent authorities should prevent residues of gentian violet in food. This can be accomplished by not using gentian violet in food producing animals.

RATIONALE: JECFA 78th concluded that it was inappropriate to set an ADI for Gentian Violet because it is genotoxic and carcinogenic. Gentian Violet is structurally related to malachite green. Consequently, the Committee could not recommend MRLs, as it was not considered appropriate to establish an ADI. JECFA 78th also noted that there was limited information on residues. Gambia concurs with JECFA 78th recommendations of no ADI and MRLs for Gentian Violet and should be treated the same way as Malachite Green.

Agenda Item 7 (CX/CAC 17/40/7) Revocation of Codex Texts

CODEX RECOMMENDED METHODS IN CODEX STANDARDS REP17/MAS, PARA 28, APPENDIX II (PART 2) REVOCATION OF CODEX TEXT (AGENDA ITEM 7, CX/CAC 17/40/7 ADD1)

BACKGROUND: The recommended methods for quick frozen vegetables CAC/RM34, 43, and 54 were revoked as a result of their replacement with new methods.

POSITION: The Gambia supports the revocation of the methods.

Agenda Item 8 (CX/CAC 17/40/8) Proposals for New Work

PROJECT PROPOSALS FOR NEW WORK - PROPOSAL FOR NEW WORK ON STANDARDS FOR SPICES AND CULINARY HERBS SUBMITTED TO CAC40 FOR APPROVAL (REP 17/SCH APPENDIX V-XI):

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

POSITION AND RATIONALE: The Gambia supports approval for new work on Codex standards for dried or dehydrated ginger, dried garlic, chili peppers and paprika. These spices are internationally traded hence there is need to establish an internationally harmonized commodity standards covering the safety, quality, hygiene and labeling in order to facilitate trade.

Agenda Item 10 (CX/CAC 17/40/10) Amendments to Codex Standards and Related Texts

EDITORIAL AMENDMENTS TO THE GUIDELINES ON NUTRITION LABELLING (CAC/GL 2-1985) REP17/NFSDU Para. 12 (ii)

BACKGROUND: CCNFSDU38 noted the existing inconsistencies in sections 3.1 and 3.2 in the Guidelines on Nutrition Labelling (CAC/GL 2 -1985) arising out of further amendments to the definition of Recognized Authoritative Scientific Bodies (RASB) in section 2.5 of the guidelines and proceeded with a consequential amendment.

POSITION: Gambia supports the adoption of the amendment.

EDITORIAL AMENDMENTS TO VARIOUS CCNFSDU STANDARDS: FLAVOURINGS, I.E., STANDARDS FOR CANNED BABY FOODS (CODEX STANDARD 73-1981), PROCESSED CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN (CODEX STANDARD 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)(REP 17/NFSDU, PARA. 16, APPENDIX 11)

CCNFSDU38 (2016) agreed to the proposals from CCFA on the editorial amendments related to the appropriate use of the term flavourings in the following standards:

- Standard for "baby foods" (CODEX STAN 73-1981) Standard for processed cereal-based foods for infants and young children (CODEX STAN 74-1981),
- Standard for follow-on formulas (CODEX STAN 156-1987),
- Guidelines for the development of supplementary food preparations for elderly infants and young children (CAC / GL 8-1991).

POSITION AND RATIONALE: Gambia supports the proposed editorial modifications to ensure coherence and alignment between the different texts of Codex.

DRAFT AND PROPOSED REVISION OF THE CLASSIFICATION OF FOOD AND FEED: VEGETABLE COMMODITY GROUPS REP17/PR, PARA. 115, APPENDIX VIII PART A STEPS 8 AND 5/8

BACKGROUND: Discussion on the revision of the Codex Classification of Food and Feed took place in the years 2010-2016. The Committee reached agreements for all ten crop groups of vegetables. The CCPR48 concluded discussions on the vegetable commodity groups and requested the EWG to compile all vegetable commodity groups finalized by CCPR to ensure consistency throughout the groups in order to send the entire vegetable commodity group to CAC40 (2017) for final adoption.

POSITION: Gambia supports the adoption at Step 8 and Step 5/8 of the vegetable commodity Group together with the proposed consequential amendments to the fruit group related to the words “sub group of” and the changes to the CXLs.

RATIONALE: The commodities have (i) similar potential for pesticide residues; (ii) similar morphology; (iii) similar production practices, growth habits, etc.; (iv) similar edible portion; (v) similar GAP for pesticide uses; (vi) similar residue behaviour. The group also provides flexibility for setting (sub) group tolerances.