

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Items 1, 4.1, 4.2, 4.3, 4.4, 4.5, 5

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

Forty-eighth Session

Rome, Italy

10-14 November 2025

## COMMENTS OF GHANA

### AGENDA ITEM 1

CX/CAC 25/48/1

#### Adoption of the agenda and methods of work for the session

**Position:** Ghana does not have any proposed changes to recommend on the provisional agenda.

### AGENDA ITEM 4.1

CX/CAC 25/48/3; CX/CAC 25/48/3 Add.1

#### Work of the Codex Committee on Fresh Fruits and Vegetables (CCFFV)

##### (i) Standard for Fresh Dates at Step 8

**Position:** Ghana supports the adoption of draft standard for fresh dates at Step 8.

**Rationale:** Outstanding issues relating to the provisions on food labelling and food additives have already been endorsed by CCFL and CCFA respectively.

##### (ii) Standard for Fresh Curry Leaves at Step 5/8

**Position:** Ghana supports the adoption of draft standard for fresh curry leaves at Step 5/8.

**Rationale:** All proposed editorial amendments and alignment by the In-session working group (IWG) have been incorporated.

### AGENDA ITEM 4.2

CX/CAC 25/48/4; CX/CAC 25/48/4 Add.1

#### Work of the Codex Committee on Food Additives (CCFA)

##### Part 1 – Standards and related texts submitted for final adoption

- (i) [Draft specifications for the identity and purity of food additives for inclusion in the List of Codex specifications for food additives \(CXA 6-2024\)](#)

**Position:** Ghana supports the recommendation by CCFA55 for the adoption of the specification by CAC at step 5/8.

**Rationale:** The food additives mentioned have undergone a comprehensive evaluation by the JECFA.

- (ii) [Draft revision of the Class names and the International Numbering System for food additives \(CXG 36-1989\)](#)

**Position:** Ghana supports the recommendation for the revision of CXG 36-1989 as recommended by CCFA55 - Appendix X of REP25/FA.

**Rationale:** The CXG 36-1989 will include: The new proposed INS number for Carbomer which is not duplicated since the Committee has allocated a new number for consideration. The term "jagua blue" as a synonym for Jagua (genipin-glycine) blue which is appropriate for labelling purposes since it is user friendly.

- (iii) [Draft food additive provisions of the General standard for food additives \(GSFA, CXS 192-1995\) and revisions to adopted provisions](#)

**Position:** Ghana supports the recommendation by CCFA55 for the adoption of the food additive provisions contained in Appendix VI, Part C.

**Rationale:** The use of these food additives in the specified food categories is technologically justified and they present no safety concerns when used at levels that are within the established maximum limits.

- (iv) [Revised food additive provisions of the GSFA in relation to the alignment of 5 for the CCASIA standards, 3 for the CCNE standards, 8 CCSCH standards, 1 CCFO standard and 1 CCCPL standard](#)

**Position:** supports the recommendation by CCFA55 for the adoption by CAC, the revised provisions of the GSFA in relation to the underlisted standards;

- a. The alignment of the five (5) CCASIA standards (Appendix VI, Part B.1).
- b. The alignment of the three (3) CCNE standards (Appendix VI, Part B.2).
- c. The alignment of the eight (8) CCSCH standards (Appendix VI, Part B.3).
- d. The alignment of the Standard for edible fats and oils not covered by individual standards (CXS 1981) (Appendix VI, Part B.4).
- e. The amendments of the food additive provisions due to the alignment of the Standard for rice (CXS 198-1995) (Appendix VI, Part B.5).

**Rationale:** To ensure alignment of the GSFA provisions with the regional and/or commodity standards and Codex Procedural Manual.

- (v) [Revision to the reference to commodity standards for the GSFA Table 3 additives for food category 12.2.1 "Herbs and spices \(ONLY SPICES\)"](#)

**Position:** Ghana supports the recommendation by CCFA55 to forward the adoption of revision to the reference to commodity standards for the GSFA Table 3 Additives for Food Category 12.2.1 "Herbs and Spices (ONLY SPICES)" (Appendix VI, Part B.3.3.1).

**Rationale:** The proposed revision will help clarify the category of foods excluded in the Annex to Table 3 additives.

- (vi) [Revised food additive sections of three CCASIA standards, three CCNE standards, eight CCSCH standards, and the Standard for rice \(CXS 198-1995\)](#)

**Background:** CCFA55 discussed and agreed to forward to CAC48, for adoption the revised food-additive sections of the following standards to CAC48:

- a. The three (3) CCASIA Standards - CXS 298R-2009, CXS 322R-2015, and CXS 355R-2023 (Appendix V, Parts A.1 - A.3).
- b. The three (3) CCNE Standards - CXS 257R-2007, CXS 258R-2007, and CXS 259R-2007 (Appendix V, Parts A.4 - A.6).
- c. The eight (8) CCSCH Standards - CXS 342-2021, CXS 343-2021, CXS 344-2021, CXS 345-2021, CXS 347 2019, CXS 351-2022, CXS 352-2022, and CXS 353-2022 (Appendix V, Parts A.7 to A. 14).
- d. The Standard for rice (CXS 198-1995) (Appendix V, Part A.15).

**Position:** Ghana supports the recommendation by CCFA55 for the adoption of the revised food additive sections of the above standards at step 5/8.

**Rationale:** Recommendations by CCFA55 is consistent with the Codex procedural manual.

- (vii) [Revised food additives provisions of the Standard for pickled cucumbers \(Cucumber Pickles\) \(CXS 115-1981\), Standard for canned stone fruits \(CXS 242-2003\); and Standard for jams, jellies and marmalades \(CXS 296 2009\)](#)

**Background:** CCFA55 discussed and agreed to forward to CAC48 for adoption the revised food additive provisions in the following standards which show consistence with GSFA:

- a. The CXS 242-2003- Standard for canned stone fruits - (Appendix V, Part B.3).
- b. The CXS 296-2009 - Standard for jams, jellies and marmalades (Appendix V, Part B2).
- c. The CXS 115-1981 - Standard for pickled cucumbers (Cucumber Pickles) to replace "oleoresin of paprika" with "Paprika extract (INS 160c(ii))" in the section for colouring matters, (Appendix V, Part B.1).

**Position:** Ghana supports the recommendation by CCFA55 for the adoption of the revised food additive provision contained in the above standards.

**Rationale:** The revision will ensure alignment of the adopted food additive provisions in the GSFA with the corresponding commodity standards. In the case of “oleoresin of paprika”, this will ensure alignment with the correct functional class, i.e. INS 160c(ii).

(viii) [Amendment to the Standard for food grade salt \(CXS 1501985\)](#)

**Background:** The Committee discussed the draft provisions relating to CXS 150 -1985. CCFA55 agreed to forward to CAC48 for adoption on the draft amendments to the labelling provisions of non-retail containers and the provision of the methods of analysis and sampling in the Standard for food grade salt (CXS 150-1985) (Appendix XII).

**Position:** Ghana supports the recommendation by CCFA55 for the adoption of the standard by CAC at step 5/8.

**Rationale:** This is consistent with the Codex procedural manual which makes reference for use of the CXS 234-1999 the single reference for methods of analysis and sampling; and also aligning with format for Codex Commodity Standards Section on labelling, as well as adoption of the General Standard for the Labelling of Non-Retail Containers (CXS 346-2021).

## Part 2 – Codex standards and related texts proposed for revocation

(i) [Specified draft food additive provisions of the GSFA \(CXS 192-1995\)](#)

**Background:** CCFA55 discussed various food additive provisions related to the GSFA and agreed to forward to CAC48 the food additive provisions of the GSFA for revocation (Appendix VII).

**Position:** Ghana supports the revocation of the use of the food additives in Appendix VII.

**Rationale:** During CCFA55 there was no technological justification for use of these food additives in the specified food categories

## Part 3 – Work proposed for discontinuation

(i) [Specified draft food additive provisions of the GSFA \(CXS 192-1995\)](#)

**Background:** CCFA55 discussed various food additive provisions related to the GSFA and agreed to forward to CAC48 the draft and proposed draft food additive provisions for discontinuation in the GSFA (Appendix VIII).

**Position:** Ghana supports discontinuation of work on the food additives as listed in appendix VIII.

**Rationale:** CCFA55 determined that there was a lack of sufficient information regarding the use of these additives and/or the absence of technological justification for their use in specific food categories.

## AGENDA ITEM 4.3

## CX/CAC 25/48/5; CX/CAC 25/48/5 Add.1

### Work of the Codex Committee on Methods of Analysis and Sampling (CCMAS)

#### Part 1 – Standards and related texts submitted for final adoption

(i) [Methods of analysis/performance criteria/sampling plans for provisions in Codex standards](#)

CCMAS44 considered and forwarded the following Methods of analysis to CAC48 for adoption:

- 1) Methods of analysis submitted by CCNFSDU;
- 2) Method for sodium chloride in food grade salt and the related sampling plan, at the request of CCFA;
- 3) Method for determining chloride as sodium chloride in dried meat, based on the response from CCAFRICA to a query from CCMAS42;
- 4) Methods for salt/sodium chloride in butter and cheese, to ensure they were up to date;
- 5) Numeric performance criteria (NPC) for sodium chloride and salt determined as chloride expressed as sodium chloride for selected fish and fishery products.
- 6) CCAS44 to agree to forward the method for determination of moisture content in whey powder with a footnote to CAC48 for adoption as a Type IV method

**Position:** Ghana supports analyzing and mapping methods that were endorsed or recommended for adoption against national capacities

**Rationale:** These methods are important in testing food quality, safety and nutrition parameters in the laboratories thus ascertaining fair trade and consumer protection.

**AGENDA ITEM 4.4****CX/CAC 25/48/6; CX/CAC 25/48/6 Add.1****Work of the Codex Committee on Contaminants in Foods (CCCF)****Part 1 – Standards and related texts submitted for final adoption**

- (i) [Maximum level \(ML\) of 2.5 mg/kg for lead in spices, dried bark for inclusion in the General standard for contaminants and toxins in food and feed \(CXS 193-1995\) at step 8 \(REP25/CF18\)](#)

**Position:** Ghana supports adoption of MLs for lead of 2.5 mg/kg for lead in spices, dried bark for inclusion in the General standard for contaminants and toxins in food and feed (CXS 193-1995) at step 8

- (ii) [ML of 2.0 mg/kg for lead in culinary herbs, dried for inclusion in CXS 193-1995 REP25/CF18 at step 5/8](#)

**Position:** Ghana supports adoption of MLs for lead in dried culinary herbs at 2.0mg/kg at step 5/8 skipping 6 and 7

- (iii) [Revised Code of practice for the prevention and reduction of aflatoxin contamination in peanuts \(CXC 55-2004\) REP25/CF18 at step 5/8](#)

**Position:** Ghana supports adoption at Step 5/8 of the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004).

**Rationale:** Aflatoxins causes acute and chronic toxicity, genotoxicity, carcinogenicity, and immune suppression. Several *Aspergillus* species produce aflatoxins under favorable conditions. Since the Code (CXC 55-2004) was adopted over 20 years ago, new practices and measures now exist to better prevent and reduce contamination. Supporting adoption of the revised Code will reduce population exposure to aflatoxins and enable countries to generate occurrence data to support establishing an MLs for total aflatoxins in ready-to-eat peanuts.

- (iv) [Editorial amendments to CXS 193-1995: Inclusion of MLs for marine biotoxins \(Section 1.5 of the Standard for live and raw bivalve molluscs \(CXS 292-2008\) REP25/CF18](#)

**Position:** Ghana supports inclusion of maximum levels (MLs) for marine biotoxins in Standard CXS 193

**Rationale:** These are toxins and their inclusion in CXS 193 will protect public health and facilitate consultation and future revisions.

**Part 2 – Work proposed for discontinuation:**

- (i) [ML of 2.5 mg/kg for lead in culinary herbs, dried REP25/CF18](#)

**Position:** Ghana support the discontinuation of work on the ML of 2.5 mg/kg for lead in culinary herbs, dried (at Step 7), and to inform CAC48 accordingly.

**Rationale:** Global data show that a 2.5 mg/kg ML corresponds to a 4% rejection rate (vs. 6.98% in PAHO region) and the 2 mg/kg ML (for herbs) was set on ALARA principles reducing intake by 12% while maintaining trade (rejection rate 1.7%).

- (ii) [ML and associated sampling plan for total aflatoxins in ready-to eat peanuts REP25/CF18](#)

**Position:** Ghana supports temporary suspension of work rather than permanent discontinuation to allow members to implement the revised Code of Practice and generate sufficient occurrence data for future reconsideration of an MLs for ready-to-eat peanuts as well as Implementation of the revised Code of Practice (CXC 55-2004).

**Rationale:** Permanent discontinuation would nullify over a decade of member efforts. Several data biases have existed which include:

- Incomplete datasets due to technical issues in GEMS/Food database.
- Non-compliance with Codex guidance on ML setting (rejection rate and exposure reduction).
- JECFA83 found no significant health benefit between 10 and 15 µg/kg; a 10 µg/kg ML would cause a 10% rejection rate and unnecessary trade losses especially for developing countries.

**AGENDA ITEM 4.5****CX/CAC 25/48/7 Rev.1; CX/CAC 25/48/3 Add.1****Work of the Codex Committee on Pesticide Residues (CCPR)****Part 1 – Standards and related texts submitted for final adoption**

- (i) [Maximum Residue Limits \(MRLs\) for different Combinations of Pesticide/Commodity \(ies\), Step 5/8](#)

**Position:** Ghana supports the proposed MRLs, but requests submission of toxicological data for chlorpyrifos and permethrin to enable JMPR establish ADI or ARfD for the pesticides that are due for periodic re-evaluation.

**Rationale:** Ghana recognizes the outcomes of the JMPR 2024 evaluations, which confirmed that there were no exceedances of the Acceptable Daily Intakes (ADIs) or the Acute Reference Doses (ARfDs) with the 5 proposed Maximum Residue Limits (MRLs). This finding underscores the protective nature of the established MRLs with respect to public health and will ultimately promote international trade.

- (ii) [Guidelines for monitoring the stability and purity of Reference Materials and related stock solutions of pesticides during prolonged storage step 8](#)

**Position:** Ghana supports the progression of work on the Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage through the Codex step procedure.

**Rationale:** The guidelines will help laboratories address challenges in monitoring the stability of pesticide reference materials during prolonged storage while improving reliability, efficiency and food safety in supporting regional and international trade.

- (iii) [Adoption of correction to the definition for “fat” in the classification of food and feed \(cxa4-1989\)](#)

**Position:** Ghana supports the amendments to section 4.8 and the correction to the definition of “fat”.

## **Part 2 – Approve revocation of Codex MRLS (CXLS) for different Combinations of Pesticide/Commodity(ies) as forwarded by CCPR56**

**Background:** Codex MRLs (CXLS) for certain combinations of pesticide/commodity(ies)- REP25/PR, paragraphs 217(i)(b) and 239(i), Appendix IV. CCPR56 Concluded by requesting revocation of CXLS for (Appendix IV) 30 pesticides for specific food commodities and further request CAC48 to revoke all CXLS for fenthion (39), parathion-methyl (59), dinocap (87), amitraz (122) and bitertanol (144) and the CXLS for 7 methamidophos (100) for cottonseed, fodder beet, potato, and sugar (Appendix IV), noting the reservation of Thailand on “amitraz”

**Position:** Ghana supports revocation of the compounds

## **Part 3: Discontinuation of Work in MRLS for different Combinations of Pesticide/Commodity(ies)**

**CCPR56 agreed that:**

- (i) MRLs for certain combinations of pesticide/commodity(ies) withdrawn from the step procedure REP25/PR, paragraph 217(ii)(a), Appendix V
- (ii) Noted that: 7 MRLs (Phosmet, Iprodione, Carbosulfan, Propiconazole, Fenpyroximate, Fipronil and Pydiflumetofen) applied to specific food commodities in the Step Procedure have been withdrawn (discontinuation of work) (Appendix V) and that CAC would be informed accordingly.

**Position:** Ghana supports discontinuation of the MRLs for different Combinations of Pesticide/Commodity(ies)

### **5(b) Insertion of a note to the CXL for Milk fats**

**Position:** Ghana thanks the Codex Secretariat for reviewing compounds with CXLS for both milk and milk fat and supports inserting the note: “for monitoring and regulatory purposes, whole milk is to be analyzed, and the result compared to the MRL for whole milk” in all relevant cases for fat-soluble pesticides. It also requests JMPR to apply this note consistently and highlights the need to build member capacity for methods to address challenges with intermediate fat-solubility pesticides.

**Rationale:** The insertion of the footnote to the schedule will help overcome the technical challenges faced by many laboratories using analytical methods that are not appropriate for separating fat from milk without also extracting residues from the non-fat portion of the sample being tested

## **AGENDA ITEM 5**

**CX/CAC 25/48/10**

### **Proposals for new work**

#### **New Work Proposals- (Development of a standard on fresh turmeric and fresh broccoli)**

**Position:** Ghana supports development of a standard on fresh turmeric and fresh broccoli as new work.

**Rationale:** There is a need to establish an international standard for fresh turmeric and standard for fresh broccoli as the proposed standards would address trade barriers, enhance exports, harmonize regulations and benefit producers by promoting fair trade practice.

Approval of the priority list of pesticides for evaluation by the FAO/WHO Joint Meeting On Pesticide Residues (JMPR)

- a. Confirmed registration for two New Compounds in 2026): Fenmezoditiaz and Metytetraprole
- b. New Uses: 27 nominations for new uses which included prioritization of top 20 compounds prioritized placing seven in 2026 RESERVE list.
- c. Periodic Review proposed for 7 compounds and confirmed support for Indoxacarb (216) and Maleic hydrazide (102)
- d. Support/data requested for Carbaryl (008), Methyl bromide (52), Disulfoton (74), Pirimiphos-methyl (86), Flumethrin (195).

**CCPR56 agreed to:**

- i. Indorse the priority list of pesticides for evaluation by the 2026 JMPR and submit it to CAC48 for
- ii. Approval (Appendix VIII); re-establish the EWG on schedules and priorities, chaired by Australia, working in English, to provide a report on the schedules and priority lists for consideration at the next meeting of CCPR;

**Position:** Ghana supports the proposed schedules and priority lists of pesticides provided on; New Compounds, New uses and Periodic review.

**Rational:**