

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 - www.codexalimentarius.org

Agenda Item 4.1, 4.2, 4.4, 4.5, 5

CAC48/CRD31

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-eighth Session

Rome, Italy

10-14 November 2025

COMMENTS OF AFRICAN UNION

AGENDA ITEM 4.1

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

Standard for Fresh Dates at Step 8

Background

At CCFFV23, India, as Chair of both the EWG and IWG presented the key outcomes. The main point of contention was the 1% tolerance for decay in "Extra" Class dates, with some members advocating for 0% to align with class specifications. The session agreed to retain the 1% tolerance, while noting the EU's reservation. CCFFV23 endorsed forwarding the draft standard for fresh dates to CAC48 for adoption at Step 8, with labelling and additive provisions already cleared by CCFL and CCFA.

Position: African Union supports adoption of the draft standard for fresh dates at Step 8.

Rationale: Labelling and food additive provisions have been endorsed by CCFL and CCFA, resolving key outstanding issues.

Standard for Fresh Curry Leaves at Step 5/8

Background: At CCFFV23, India, as Chair of the EWG and IWG, introduced the draft standard. The main issue raised was whether the indication of "no food additives permitted" required referral to CCFA. The Codex Secretariat clarified that, per the Procedural Manual, all food additive provisions, whether permitted or not, must be referred to CCFA for endorsement. Accordingly, CCFFV23 agreed to forward the standard to CAC for adoption at Step 5/8, pending endorsement of the food additive and labelling provisions by CCFA and CCFL, respectively.

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

AGENDA ITEM 4.2

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

Part 1 – Standards and related texts submitted for final adoption

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

Background: During the 99th JECFA concluded on specifications for the identity and purity of food additives for three (3) food additives and ten (10) flavouring agents. CCFA55 agreed to forward revised and new full specifications for food additives to CAC48 for adoption at Step 5/8 (Appendix III).

Position: African Union supports the adoption of the specification by CAC48 at step 5/8 based on JECFA's evaluation.

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

Background: CCFA55 discussed various food additive provisions related to the GSFA and agreed to forward the draft and proposed draft food additive provisions of the GSFA to CAC48 for adoption at Steps 8 and 5/8, as well as revisions to the adopted provisions (Appendix VI, Part C).

Position: African Union supports 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 has been evaluated to be technologically justified and they present no safety concerns when used at levels that are within the established maximum limits.

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

Background: CCFA55 discussed and agreed to forward to CAC48 for adoption, the revised provisions of the GSFA in relation to:

- 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 19-1981) (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).

Position: African Union supports the adoption of the revised provisions of the GSFA in relation to the above-mentioned standards.

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

Revision to the reference to commodity standards for the GSFA Table 3 additives for food category 12.2.1 “Herbs and spices (ONLY SPICES)”

Background: CCFA55 agreed to forward to CAC48 for adoption the 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).

Position: African Union supports the recommendation by CCFA55.

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

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: African Union supports the adoption of the revised food-additive sections of the above-mentioned standards at step 5/8.

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

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: African Union supports the adoption of the revised food additive provision contained in the above-mentioned 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).

Amendment to the Standard for food grade salt (CXS 150-1985)

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: African Union 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 refers 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).

AGENDA ITEM 4.4

CX/CAC 25/48/6, CX/CAC 25/48/6 Add.1

Revised Code of Practice for the prevention and reduction of Aflatoxin contamination in Peanuts (CXS 55-2004), Step 5/8

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

Part 1: Standards and related texts submitted for final adoption and discontinuation

Background: At CCCF18, Brazil, serving as Chair of the Electronic Working Group (EWG), presented the final draft Maximum Levels (MLs) for lead in spices, dried bark, and culinary herbs. The presentation was based on updated data collected through a new JECFA call in early 2025, which specifically excluded entries linked to economic adulteration. The EWG reviewed all background information, methodological considerations, and responses to Circular Letter CL 2025/09-CF. Sensitivity analyses were carried out to compare full dataset vs. dry-weight-only data, and to assess trends between older and newly submitted data.

Key Issues and Positions:

- One Member supported 3.0 mg/kg for spices and dried bark, but objected to the proposed 2.5 mg/kg for culinary herbs, citing insufficient data. They recommended using the P95 percentile only where sufficient data were available.
- Another Member supported both 3.0 mg/kg (spices) and 2.5 mg/kg (herbs), arguing these values produced acceptable rejection rates based on national monitoring data.
- A third Member preferred a more conservative limit of 1.5 mg/kg for herbs.
- A Member Organization emphasized the need to use global rather than regional data to ensure harmonized international standards. They proposed 2.5 mg/kg for spices and 2.0 mg/kg for herbs, expressing concern that reliance on PAHO data may not reflect higher lead levels observed in other regions.

CCCF Decision and Justification:

CCCF considered the arguments and the technical justification presented by the EWG. It agreed to:

- Adopt a final ML of 2.5 mg/kg for spices and dried bark.
- Adopt 2.0 mg/kg for dried culinary herbs, recognizing that global and regional P95 values support this level, especially after exclusion of samples with high limits of quantification (LOQs).
- Maintain the footnote referencing the derivation of MLs for fresh herbs based on moisture content, though this note was later recommended for deletion by the EWG.

Further Clarifications by EWG Chair:

- The EWG reported that lead levels in new submissions were not lower than older data, suggesting that previous datasets were not distorted by adulteration and could be retained.
- For culinary herbs, samples with high LOQs were excluded, and both global and regional P95 values were compared against proposed MLs to validate them.
- The EWG proposed removing the note on extrapolating MLs for fresh herbs from dried samples, concluding that it was unnecessary given the revised methodology.

CCCCF18 agreed to:

- Forward to CAC48 the following (Appendix III):
 - an ML of 2.5 mg/kg for lead in spices, dried bark for adoption at Step 8, noting the reservations of China and India as expressed in paragraphs 37 and 39; and
 - an ML of 2.0 mg/kg for lead in culinary herbs, dried for adoption at Step 5/8 (with the omission of Steps 6 and 7), with the explanatory note for fresh culinary herbs as indicated in paragraph 46, noting the reservations of China and India as expressed in paragraphs 37 and 39.
- Discontinue work on the ML of 2.5 mg/kg for lead in culinary herbs, dried (at Step 7), and to inform CAC48 accordingly.

Position: African Union supports adoption of MLs for lead in dried culinary herbs at 2.0mg/kg at step 5/8 and MLs for dried barks at 2.5mg/kg at step 8 and discontinuation of work on the ML at 2.5 mg/kg for lead in culinary herbs, dried (at Step 7).

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%).

AGENDA ITEM 4.5

CX/CAC 25/48/7, CX/CAC 25/48/7 Add.1

Partie 1 : Normes et textes connexes soumis pour adoption finale

➤ **Limites maximales de résidus (LMR) pour différentes combinaisons, pesticide/produits**

Contexte :

Sur la base du rapport de la réunion du JMPR tenue en 2024 et en tenant des réserves exprimées par certains membres, une liste de LMR pour différentes combinaisons pesticide/produits a été transmise à la CAC48 pour adoption à l'étape 5/8.

Position :

Le Sénégal soutient l'adoption des LMR retenues pour différentes combinaisons pesticide/produits tout en encourageant la fourniture de données concernant certaines matières actives et leurs métabolites pour une évaluation plus complète des risques liés à leur ingestion par voie alimentaire.

Justification :

Les limites maximales de résidus ont été retenues suite à un travail rigoureux d'évaluation des risques par le JMPR sur la base de données fiables et des approches. Cependant, certaines LMR devraient être basées sur les niveaux de consommation les plus élevés surtout en ce qui concerne les céréales (propiconazole, fenbufenozide, Fosetyl AL).

➤ **Lignes directrices pour la surveillance de la stabilité et de la pureté des matériaux de référence et des solutions mères de pesticides pendant un stockage prolongé**

Contexte :

Un groupe de travail électronique établi par le CCPR55 et présidé par l'Inde, a révisé les lignes directrices sur la base des commentaires écrits et soumis à la session en réponse à la circulaire CL 2025/38PR, y compris les documents de réflexion (CRD). Les lignes directrices révisées ont été présentées dans le document CRD04 pour examen lors du CCPR56 au cours duquel, le président du groupe de travail électronique avait rappelé la décision du CCPR55 d'élargir le champ d'application des lignes directrices aux solutions étalons mixtes de pesticides. Il a souligné les principaux points clés examinés lors de la révision des lignes directrices par le groupe de travail intégré, en particulier l'inclusion d'une méthode supplémentaire (méthode 3.3) dans l'approche 3 conformément à la norme ISO 33405 pour la vérification de la stabilité des solutions étalons de pesticides mixtes de matériaux de référence. Le CCPR56 a été invité à examiner l'avancement des lignes directrices dans la procédure par étapes. Il a pris note du soutien apporté aux lignes directrices et a apporté quelques corrections éditoriales à des fins de clarté ou de cohérence avec les décisions

antérieures et a convenu que les lignes directrices étaient prêtes à être avancées dans la procédure par étapes.

Position :

Le Sénégal soutient l'adoption à l'étape 8 des Lignes directrices pour la surveillance de la stabilité et de la pureté des matériaux de référence et des solutions mères de pesticides pendant le stockage prolongé (Annexe VII) à la CAC48

Justification :

Les matériaux de référence et les solutions mères de pesticides étant très coûteux et en général importés, l'adoption de ces lignes directrices permettra de réduire les pertes et d'optimiser les ressources limitées des laboratoires des pays en développement. Elle contribuera à garantir la validité des données issues des laboratoires et renforcera leur capacité à participer à la génération de données acceptées par les comités d'experts de la FAO et de l'OMS.

Partie 2 : Liste prioritaire des pesticides proposée pour évaluation par la JMPR pour approbation

Contexte :

Sur la base du rapport du JMPR de 2024, une liste prioritaire des pesticides pour évaluation par la JMPR a été transmise à la CAC48 pour approbation.

Position :

Le Sénégal soutient l'adoption de la liste prioritaire des pesticides pour évaluation par la JMPR telle que proposée dans l'annexe VIII (REP25/PR, paragraphe 279(iii)).

Justification :

Les pesticides retenus présentent un intérêt majeur (nouveaux composés, nouveaux usages, besoins de réévaluation périodique) pour les pays producteurs de céréales et de légumineuses comme le Sénégal. De plus cette évaluation va renforcer la protection des consommateurs.

Partie 3 : Normes du Codex et textes apparentés proposés pour révocation

➤ **LMR du Codex (CXL) pour certaines combinaisons de pesticides/produit(s)**

Contexte :

Sur la base du rapport de la réunion du JMPR tenue en 2024, une liste de LMR pour différentes combinaisons pesticide/produits a été transmise à la CAC48 pour révocation.

Position :

Le Sénégal soutient la révocation des LMR du Codex (CXL) retenues pour certaines combinaisons de pesticides/produit(s) à l'exception de l'amitraz.

Justification :

Des LMR ont été proposées pour ces combinaisons de pesticides/produit(s) alors qu'en ce qui concerne l'amitraz, aucune proposition de LMR n'a été faite et que ce produit est encore utilisé en élevage dans certains pays.

AGENDA ITEM 4.5

CX/CAC 25/48/7, CX/CAC 25/48/7 Add.1

Maximum Residue Limits (MRLs) for different Combinations of Pesticide/Commodity (ies), Step 5/8

Background: A Joint Meeting by FAO Panel of Experts and WHO Core Assessment Group on Pesticide Residues was held on 17–26 September 2024 in Rome with extra virtual session on 9 October 2024. The expert Committee undertook an evaluation of 37 pesticides on Maximum Residue Levels (MRLs) to support the Codex Committee on Pesticide Residues (CCPR). The Supervised Trials Median Residues (STMR) and Highest Residues (HR) dietary exposure assessments and indicated that new Acceptable Daily Intakes (ADIs) and Acute Reference Doses (ARfDs) where needed. During 56th Session of the Codex Committee on Pesticide Residues there was a consensus to forward 29 out of 37 pesticides in different food commodities MRLs for adoption at Step 5/8 to CAC48. Refer to Appendix III on Maximum Residue Limits for Pesticides (At Step 5/8) (For adoption by CAC).

Position: African Union supports the proposed MRLs whose risk assessment outcome indicate no public health concerns. These MRLs will promote trade in food commodities. African Union also looks forward to further discussions on the MRLs for Chlorpyrifos and permethrin once toxicological data is submitted to enable JMPR establish ADI or ARfD.

Guidelines for monitoring the stability and purity of Reference Materials and related stock solutions of pesticides during prolonged storage step 8

Position: African Union supports the adoption of the Guidelines for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage at step 8.

AGENDA ITEM 5

CX/CAC 25/48/10

No.	Committee / Proposer	New Work Proposal	Rationale for African Union's Support
1	CCAFRICA	Regional Standard for Braised or Boiled, Salted and Unsalted, Dried Fish (Africa)	This standard addresses a widely traded and culturally significant food product across Africa. Establishing a harmonized regional standard will enhance intra-African trade, promote consumer safety, and support compliance with AfCFTA sanitary and phytosanitary requirements.
2	CCNASWP	Regional Standard for Galip Nut	African Union supports new work on this proposal
3	CCNASWP	Regional Standard for Breadfruit Flour	Breadfruit is nutritionally important in food security contexts. African Union supports this initiative as it reinforces Codex's role in standardizing climate-resilient crops
4	CCFFV	Standard for Fresh Turmeric	Turmeric is increasingly produced in parts of Africa and is traded both regionally and internationally. A Codex standard will support market access, improve quality assurance, and align with Africa's ambitions to diversify horticultural exports.
5	CCFFV	Standard for Fresh Broccoli	With growing demand for broccoli in African urban markets and increasing regional cultivation, African Union supports this standard as a step towards diversifying safe, fresh vegetable trade and promoting healthy diets.
6	CCCF	Revision of the Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feeding Stuffs for Milk-Producing Animals (CXC 45-1997)	Aflatoxin control is a critical public health and trade priority in Africa. Supporting this revision aligns with Africa's ongoing efforts to improve feed safety, reduce contamination in milk and dairy chains, and meet international SPS standards.