

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3-6, 9, 11, 12, 17, 20.2, 21

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

39th Session

FAO Headquarters, Rome, Italy, 27 June – 1 July 2016

(COMMENTS OF EGYPT)

Agenda Item 3 - Final Adoption of Codex Texts at Steps 8, 5/8 and 5A

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES (CCNFSDU)

Additional or Revised Nutrient Reference Values for Labeling Purposes in the Guidelines on Nutrition Labelling (CAC/GL 2-1985) (Proposed Draft) (REP16/NFSDU, para. 52a, Appendix II, Part 1)

BACKGROUND

The Committee agreed to forward the new and revised NRVs-R for Copper, Iron (dietary description and footnote), Magnesium, Phosphorus, Vitamin E and Vitamin A (dietary equivalents and conversion factors) at Steps 5/8 (with the omission of Steps 6 and 7),

Egypt POSITION

Egypt supports adopting the draft additional or revised NRVs as proposed by the 37th CCNFSDU at Steps 5/8.

Amendment to the Annex of the Guidelines on Nutrition Labeling (CAC GL 2-1985) (Draft) (REP16/NFSDU, para. 52a, Appendix II Part 2)

BACKGROUND

The Committee agreed to forward the amendments to the Annex to the General Principles for Establishing Nutrient Reference Values for the General Population (para 2.5) for adoption by CAC39:

Egypt POSITION

Egypt supports adopting the proposed amendments.

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS (CCFICS)

Principles and Guidelines for the Exchange of Information between Importing and Exporting Countries to support the Trade of Food (Proposed Draft) (REP16/FICS, para 25, Appendix II)

BACKGROUND

This is concerning situations where exchange of information may be required between the competent authority of the importing and exporting country for the assessment of relevant component(s) of an exporting country's National Food Control System (NFCS) that may cover a product or products prior to the initiation or maintenance of trade.

The Committee agreed to forward the proposed draft Principles and Guidelines to CAC39 for adoption at Steps 5/8

Egypt POSITION

Egypt supports adopting the proposed draft text at Step 5/8.

Revision of the Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations (CAC/GL 19-1995) (Proposed Draft) (REP16/FICS, para 43, Appendix IV)

BACKGROUND

These Guidelines gives the required guidance in how to respond to food safety emergencies. However, The Guidelines do not cover import rejections caused by failure to comply with importing country requirements.

The Committee agreed to forward the proposed draft revised Principles and Guidelines to CAC39 for adoption at Step 5/8.

Egypt POSITION

Egypt supports adopting the proposed draft text at Step 5/8.

Revision of the Guidelines for the Exchange of Information between Countries on Rejections of Imported Food (CAC/GL 25-1997) (Proposed Draft) (REP16/FICS, para 48, Appendix V)

BACKGROUND

This provides guidance to the basis for structured information exchange on rejections of imported food where the reason for the rejection is related to food safety and fair practices in food trade.

The Committee agreed to forward the proposed revised Guidelines to CAC39 for adoption at Step 5/8

Egypt POSITION

Egypt supports adopting the proposed revised text at Step 5/8 as the use of this guidelines is intended to improve transparency whenever food is rejected.

CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING (CCMAS)

Methods of Analysis and Sampling in Codex Standards (REP16/MAS, para. 44, Appendix II)

BACKGROUND

Endorsed Methods & Sampling Plans:

Contaminants in Food:

- SAMPLING PLAN AND METHOD PERFORMANCE CRITERIA FOR FUMONISINS (FB1 + FB2) IN MAIZE GRAIN AND MAIZE FLOUR AND MAIZE MEAL
- SAMPLING PLAN AND METHOD PERFORMANCE CRITERIA FOR DEOXYNIVALENOL (DON) IN CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN; IN FLOUR, MEAL, SEMOLINA AND FLAKES DERIVED FROM WHEAT, MAIZE OR BARLEY; AND IN CEREAL GRAINS (WHEAT, MAIZE AND BARLEY) DESTINED FOR FURTHER PROCESSING

B. Fish and Fishery products

C. Nutrition and Foods for Special Dietary Uses (infant formula only)

D. Milk and Milk Products

- Update to the current list of recommended IDF/ISO methods in the section Milk and Milk Products of CODEX STAN 234

E. Fats and Oils

EGYPT POSITION:

EGYPT supports adoption of the endorsed analytical methods.

Amendments to the Procedural Manual (REP16/MAS, paras. 60 and 73, Appendix III)

BACKGROUND

The Committee agreed to amend the General Criteria for the Selection of Methods of Analysis section of the Procedural Manual and to send it to the 30th Session of the Committee on General Principles (CCGP) for endorsement and adoption by the 39th Session of the Commission.

Egypt POSITION

Egypt supports the proposed adoption to the General Criteria for the Selection of Methods of Analysis section of the Procedural Manual.

CODEX COMMITTEE ON FOOD ADDITIVES (CCFA)**Specifications for the Identity and Purity of Food Additives (REP16/FA, para. 30 (i), Appendix III, Part A)****Egypt Position:**

Egypt supports adopting the draft specifications.

Revision of Food Category 01.1 "Milk and dairy-based drinks" (renamed "Fluid milk and milk products") and its consequential changes (REP16/FA, para. 87, Appendix XII)**BACKGROUND**

The 48th Session of the Codex Committee on Food Additives (CCFA48) agreed:

- i) to revise the titles and descriptors of food categories 01.1, 01.1.1, 01.1.3, 01.1.4, to include a new food category 01.1.2 "Other fluid milks (plain)";

to include "Fermented milks (plain)" as they share the same food additive provisions according to the Standard for Fermented Milks).

The Committee noted that the scope of the renamed food categories (i.e. 01.1, 01.1.1, 01.1.3, 01.1.4) had not substantially changed and, therefore it was not necessary to revoke and/or discontinue the provisions currently included therein but only to verify their appropriateness. However, the Committee noted that the new food category 01.1.2 "Other fluid milks (plain)" needed to be populated.

PART I: Food Category System**01.0 Dairy products and analogues, excluding products of food category 02.0****01.1. Fluid Milk and Milk Products 01.1.1. Fluid Milk (plain)****01.1.2. Other Fluid Milk (plain)****01.1.3. Fluid Buttermilk (plain)****01.1.4. Flavored Fluid Milk Drinks**

The Committee requested that the e WG on the GSFA consider the appropriateness of food additive provisions (adopted and in the Step process) in the renamed food categories 01.1, 01.1.1, 01.1.3 and 01.1.4 for discussion at the next session.

Egypt POSITION

Egypt supports adopting the draft revision of Food Category 01.1. , Egypt also would like to participate in the EWG on the GSFA as the local legislation for Food Additives in Egypt is mainly referencing GSFA.

Food Additive Provisions of the General Standard for Food Additives (GSFA) at Step 8 and 5/8 (REP16/FA, paras 98(i) and Appendix VII, Parts A-F)

The Committee agreed to forward for adoption by the Commission the revision of the existing provision for Quillaia Extract (Type 1 and 2) :

<u>Quillaia Extracts</u>				
INS 999(i) Quillaia extract type I Functional Class: Emulsifier, Foaming agent				
INS 999(ii) Quillaia extract type 2 Functional Class: Emulsifier, Foaming agent				
<u>Food Cat. No.</u>	<u>Food Category</u>	<u>Max level</u>	<u>Notes</u>	<u>Step</u>
14.1.4	Water-based flavored drinks, including "sport," "energy," or "electrolyte" drinks and particulated drinks	50 mg/kg	132, 293	8

Note 132: Except for use in semi-frozen beverages at 130 mg/kg on a dried basis. Note 293: On the saponin basis.

Egypt Position : Egypt Supports the proposed revision for Quillia extract to Food Category 14.1.4

Food Category No. 14.1.4 Water-based flavoured drinks, including “sport,” “energy,” or “electrolyte” drinks and particulate drinks

Additive	INS	Step	Year	Max Level	Notes
BENZOATES 13 & 301	210-213		8	2016	250 mg/kg

Note 13: As benzoic acid.

Note 301: Interim maximum level until CCFA49

Egypt Position:

Egypt supports the proposed revision & propose to consider a grace period to comply with the new ML in case approved, In addition to reviewing any exceptions in this food category which might require higher limit of Benzoates to effectively preserve the drink & avoid microbial growth.

In addition to considering different Climatic & transport conditions in different regions that can affect the safety & stability of Beverages in case of lowering the preservative level.

Amendments to the International Numbering System for Food Additives (CAC/GL 36-1989) (REP16/FA, para. 110 and Appendix XIII)

EGYPT POSITION

Egypt supports adoption of the proposed amendments to the INS at Step 5/8.

Revision of Sections 4.1c and 5.1c of the General Standard for the Labeling of Food Additives When Sold as Such (CODEX STAN 107-1981) (REP16/FA, para. 155, Appendix XV)

BACKGROUND :

The CCFA48 agreed to make revisions to the flavor labeling provisions in the General Standard for the Labeling of Food Additives When Sold as Such and also to request CCFL to endorse them.

Egypt Position

Egypt supports adopting the proposed revision to the General Standard for the Labeling of Food Additives When Sold as Such.

Revised food additives section of the Standards for Coca Butter, Chocolate and Chocolate Products, Cocoa (Cacao) Mass (Cocoa/Chocolate Liquor) and Cocoa Cake and Cocoa Powders (Cocoas) and Dry Mixtures of Cocoa and Sugars (REP16/FA, para. 52(i), Appendix VI)

Egypt Position:

Egypt supports the proposed revision.

CODEX COMMITTEE ON CONTAMINANTS IN FOODS (CCCF)

Maximum levels of inorganic arsenic in husked rice (REP15/CF, para. 45, Appendix II)

BACKGROUND

The Committee agreed to advance the ML of 0.35 mg/kg for husked rice for adoption by CAC39

EGYPT POSITION :

Egypt Fully supports 0.25 mg/kg as ML for Arsenic in Husked Rice , Egypt would like to register reservation on the proposed limit of 0.35 mg/kgm .

Proposed draft revision of the maximum levels for lead in fruit juices and nectars ready-to- drink (inclusion of passion fruit in the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) (REP16/CF, para. 89 and Appendix III)

BACKGROUND

The proposed revision to include passion fruit juice in the MLs of 0.03 mg/kg for lead in fruit juices and nectars (excluding juices exclusively from berries and other small fruits).

Egypt Position :

Egypt fully supports the proposed inclusion of passion fruit juice in the ML of lead in juices and nectars (ready-to-drink) at 0.03 mg/kg.

Revised Code of Practice for Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003) (REP16/CF, para. 124, Appendix IV) & Proposed annexes on zearalenone, fumonisins, ochratoxin A, trichothecenes and aflatoxins to the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003) (REP16/CF, para. 128, Appendix IV)

BACKGROUND

This Code of Practice contains general principles for the reduction of various mycotoxins in cereals.

The Committee agreed that the draft revised COP can be submitted for adoption by the Commission.

Egypt Position:

Egypt supports the adoption of the revised COP.

Agenda Item 4 - Adoption of Codex Texts at Step 5

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS (CCFICS)

Guidance for Monitoring the Performance of National Food Control Systems (REP16/FICS, para. 32, Appendix III)

BACKGROUND

An effective national food control system (NFCS) is essential for ensuring the safety and suitability of food for consumers and ensuring fair practices.

This Proposed Guidelines presents a framework to support the monitoring and system review function of the NFCS. It also supports a common understanding of performance monitoring principles, terminology, and best practices.

The Committee agreed to forward the proposed draft Guidance to CAC39 for adoption at Step 5

Egypt Position

Egypt supports advancing the proposed Guidance to Step 5.

CODEX COMMITTEE ON FOOD LABELING (CCFL)

Proposed revision of the General Standard for the Labeling of Prepackaged Foods: Date marking (REP16/FL, para. 49, Appendix II)

BACKGROUND

CFL made additional revisions to the text (see REP16/FL) and supported moving the text to Step 5.

For use in Date Marking of prepackaged food:

“Date of Manufacture” means the date on which the food becomes the product as described. This is not an indication of the durability of the product.

“Date of Packaging” means the date on which the food is placed in the immediate container in which it will be ultimately sold. This is not an indication of the durability of the product.

“Best Before Date” or “Best Quality Before Date” means the date which signifies the end of the period, under any stated storage conditions, during which the unopened product will remain fully marketable and will retain any specific qualities for which implied or express claims have been made. However, beyond the date the food may still be acceptable for consumption.

“Use-by Date” or “Expiration Date” means the date which signifies the end of the period under any stated storage conditions, after which the product should not be sold or consumed due to safety and quality reasons.

The Committee concluded that the only outstanding issue that needed further consideration was the draft criteria for exemptions from date marking that will be discussed at the next session.

Egypt Position :

Egypt supports advancing the proposed changes to step 5.

CODEX COMMITTEE ON MILK and MILK PRODUCTS (CCMMP)

Proposed draft Standard for Dairy Permeate Powders (CL 2016/12-MMP)

BACKGROUND

Based on the outcome of the WG, for advancement of the proposed Draft Standard for Dairy Permeate Powders

Egypt Position

In general, Egypt agrees (with Canada, India, Mexico, Switzerland, USA & IDF) and supports the proposed draft standard for DPP prepared by New Zealand (Report on responses to CL 2016/12 – MMP).

In brief, some comments should be taken in consideration:

- Agree that drying technology varies and will develop with time and need not to be specified in the standards (Description Section).
- Anticaking agents are of great importance from the technological point of view for quality of DPP.

Agenda Item 5 - Revocation of Codex texts

CODEX COMMITTEE ON FOOD ADDITIVES (CCFA)

Specifications for withdrawal (REP16/FA, para. 30 (ii), Appendix III)

BACKGROUND

The 48th CCFA agreed to forward the following food additive specifications for withdrawal. The Committee agreed to request CAC39 to withdraw the specifications for aluminium silicate (INS 559), calcium aluminium silicate (INS 556) and glycerol ester of gum rosin (INS 445(ii)).

Egypt Position

Egypt agrees with the proposed revocations.

Agenda Item 6 - Proposals for New Work

CODEX COMMITTEE ON FOOD HYGIENE (CCFH)

Revision of the General Principles of Food Hygiene (CAC/RCP 1-1969) and its HACCP Annex (REP16/FH, para. 45 (c) and Appendix V)

Purpose and Scope of the new work

The General Principles of Food Hygiene (CAC/RCP 1-1969) and its Annex: Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application provide food business operators worldwide with the basis for producing food that is safe and suitable for consumption.

Egypt POSITION

Egypt supports the proposed new work.

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES (CCNFSDU)

Proposed guideline for ready to use therapeutic foods (RUTF) (REP16/NFSDU, para. 88 and Appendix IV)

Purpose and Scope of the new work

The scope of the work is to clearly define RUTF in terms of its composition and safety aspects related to suitable ingredients, incorporation of the nutritional composition as outlined in the 2007 Joint Statement by WHO, WFP, UNSCN and UNICEF, appropriate criteria and limits for relevant microbiological hazards and chemical contaminants (e.g. heavy metals, mycotoxins and pesticides) and labelling requirements respectively in order to provide protection to vulnerable consumers of RUTF.

Egypt POSITION

Egypt supports the proposed new work.

CODEX COMMITTEE ON FOOD LABELING (CCFL)

Guidance for the labeling of non-retail containers of food (REP16/FL, para. 54) and Appendix III)

Purpose and Scope of the new work

The proposal seeks to initiate work on development of guidance for labelling of non-retail containers of food that are not meant for direct sale to the consumer. The proposal does not seek to open discussion on labelling of pre-packaged food as outlined in Codex STAN 1-1985. The work will consider and seek to provide guidance to competent authorities, where appropriate, with regard to information provided business to business through

labelling of nonretail containers and other means with due regards to ensuring innovative practices and focusing on risk areas identified by the competent authority.

Egypt Position:

Egypt would like to support the idea of Guidance of labeling for Non-Retail container, through including this in the CXS 1-1985 as per the following proposal :

- Add a new definition item to clarify the types of Non-Retail containers
- Add a new sub item in item 6 "EXEMPTIONS FROM MANDATORY LABELLING REQUIREMENTS " as 6.2 to clarify what should be labelled & other items to be documented only.
- Egypt would like also to ensure that the proposed new guidelines will not create unintended consequences & affect the flow of business.

PROPOSAL BY NEW ZEALAND

Emerging Issues: A proposed risk management approach to address detection in food of chemicals of very low public health concern

Advanced analytical methods and testing technologies increasingly result in detections that are of very low exposure and very low potential public health concern but such detections can place unjustified strain on resources and cause unnecessarily negative impacts on trade.

The potential for trace levels of chemicals to inadvertently get into food at various stages of production and processing (e.g. cleaning agents) has long been recognized by regulatory authorities around the world. This potentiality is increasing as new technologies related to food production and processing are adopted and innovation in broader areas expands e.g. dealing with climate change and protection of the environment.

Purpose and Scope of the new work

The purpose and scope of this standard is to promote an internationally harmonized approach to addressing possible public health and trade issues arising from detections of traces of chemicals presenting very low exposure and very low potential public health concern that may inadvertently be present in food. The proposed new work:

- Excludes intentional and fraudulent addition of chemicals to foods; and
- does not cover any chemicals that are subject to prior regulatory approval requirements;

Egypt Position

- Egypt appreciates the proposal of New Zealand & supports the new work

Agenda Item 9 - Codex Work Management and Functioning of the Executive Committee

Egypt Position

- Egypt share many delegations the same concerns for the need of an internal review & also this may cause a potential negative impact on ongoing Codex work that could result from opening discussions on divisive issues that had previously been settled in Codex.

Agenda Item 11 - Codex work on anti-microbial resistance

- i. Start new work on:
 - The revision of the Code of Practice to Minimize and Contain Antimicrobial Resistance (CAC/RCP 61-2005) (project document: Appendix 1, Part 1); and
 - The development of Guidance on Integrated Surveillance of Antimicrobial Resistance (attached project document: Appendix 1, Part 2);
- ii. Establish a dedicated Task Force on AMR (attached draft TORs: Appendix 2) and identify a host country(ies);
- iii. Request FAO/WHO to provide scientific advice on AMR, in collaboration with OIE (attached draft TORs: Appendix 3).
- iv. Request FAO and WHO to develop a capacity development program to respond to the need identified.

Egypt Position

Egypt supports Initiation of new work.

Agenda Item 12 - Matters referred to the Commission by Codex Committees and Task Forces

CX/CAC 16/39/13

A. MATTERS FOR INFORMATION

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES (CCNFSDU)

Information documents (REP16/NFSDU)

- v. The Committee agreed to make available the recorded details of all NRVs-R as an information document, in accordance with the "Guidance on information documents"

CODEX COMMITTEE ON GENERAL PRINCIPLES (CCGP)

Consistency of risk analysis texts across relevant Codex Committees (REP16/GP)

The Committee agreed to recommend to the Commission that:

- CCNFSDU should revise the text on nutritional risk analysis and consider how to include JEMNU as a primary source of scientific advice.
- The Secretariat should address minor numbering issues in the texts for CCCF, CCRVDF and CCPR with the relevant Committees.

Egypt Position:

- Egypt agrees with the CCGP recommendations, especially asking CCNFSDU to revise the text on nutritional risk analysis and consider how to include the FAO/WHO Joint Expert Meeting on Nutrition (JEMNU) as a primary source of scientific advice to the Committee.

COMMITTEE ON SUGARS (CCS)

Report on the Draft Standard for Non-Centrifuged Dehydrated Sugar Cane Juice

1. The circular Letter CL2016/15-CS invited comments on the proposals and recommendations, prepared by Colombia, CCS host country, in regard to the draft Standard for Non-Centrifuged Dehydrated Sugar Cane Juice.
2. The proposals are:
 - Colombia, as host of the Committee on Sugars, recommends a physical meeting of the Committee on Sugars, taking into account that the aspects that are preventing consensus are few, but technically specific, meriting review and direct dialogue between the interested parties to achieve better understanding and real progress towards an agreement. In order to achieve this, Colombia formally requests that consideration be given to vital support from the Commission through the Codex Trust Fund or another multilateral financial mechanism to cover the incurred costs and expenses from holding a physical meeting.
 - Colombia states that at this time it is unable to offer any indication on the possibility of assuming some of the costs associated with holding the meeting. Colombia's course of action will depend on the Commission's decision on the raised proposal.
3. The recommendations were that CAC:
 - Note the review and proposals presented in CL 2016/15-CS;
 - Note that the comments submitted in response to CL 2015/19-CS highlight the continuing differences among members on the core issues relating to the name of the product, scope, chemical characteristics, labelling and methods of analysis;
 - Note that these differences are the very same issues that have previously impeded advancement of the standard; and
 - Consider the next steps in relation to this work taking into account the review and proposals presented in this document, the responses to CL 2015/19-CS, and the discussion and recommendation made at CAC38 in relation to further work on this standard (REP15/CAC, paragraph 48).

Egypt Position

Egypt appreciates the opportunity to comment further in response to CL 2015/19-CS, on the proposed Draft Codex Standard for Non-Centrifugal Dehydrated Sugar Cane Juice.

Specific Comments

- CL 2016/15-CS still refers to this product as juice, since it is in fact not juice, but a form of sugar. We believe that this product should be called “non-centrifugal cane sugar” or a variation of this term, such as “raw non-centrifugal cane sugar” or “unrefined non-centrifugal cane sugar.”
- FOA has defined sugar, non-centrifugal as “generally derived from sugar through traditional methods without centrifugation” under FAOSTAT code 0163. The committee should consider the term “non-centrifugal” (rather than “non-centrifuged”) as it is used by FAO for consistency
- This product is not juice, but a form of sugar (produced traditionally without centrifugation).
- The Codex Standard for Sugars (CODEX STAN 212-1999) defines “raw cane sugar” as “partially purified sucrose, which is crystallized from partially purified cane juice, without further purification, but which does not preclude centrifugation or drying, and which is characterized by sucrose crystals covered with a film of cane molasses.” As indicated in India’s comment on CL 2013/9-CS, the production of jaggery involves some processing of sugar cane juice and scum removal operations before actual evaporation. If work on the draft standard proceeds, it should be clear on how this product is different from “raw cane sugar” or if the sugar standard needs to be revised to modify “raw cane sugars”
- The term “raspadura” needs to be included. It is the name of the product in Panama and Cuba. The term “raspadura” is included but this is the Portuguese term used by Brazil.
- The international commission for uniform methods of Sugar Analysis (ICUMSA) analytical methods should be used, rather than only the Association of Official Analytical Chemist (AOAC) methods. This proposed standard does not take into account the ICUMSA methods and lists only AOAC methods.
- We recognize that the ICUMSA methods for iron and sulfite are for white sugars, so they may not work as well for this commodity. However, the ICUMSA conductivity ash method would work and is much quicker, easier, less cumbersome, less equipment intensive, and safer than the AOAC, ash method. In fact, ICUMSA did studies to show the equivalence of results between conductivity methods and ash methods. As far as we are aware, no studies were presented to show why the AOAC method should be preferred over the ICUMSA methods. Additionally, all of the AOAC methods require an advanced equipment, which would rarely be available in a factory that makes this product.

Egypt suggests that all of the analytical methods should be referred to the Codex Committee on Methods of Analysis and Sampling (CCMAS) for endorsement before further advancement of this document.

B. MATTERS FOR ACTION

CODEX COMMITTEE ON METHODS ON ANALYSIS AND SAMPLING (CCMAS)

Protein conversion factors (REP16/MAS)

The Committee noted that it was not in a position to reply to the question posed by CAC38 on the appropriate protein conversion factors for soy products as this was in the remit of other Codex Committees; and noted that it might be timely for FAO and WHO to convene an expert panel to review available literature to assess the scientific basis for protein conversion factors.

Egypt Position:

Egypt agrees with the CCMAS that it would be timely for FAO and WHO to convene an expert panel to review the available literature to assess the scientific basis for protein conversion factors.

The draft General Standard for Processed Cheese CAC has been asked to make a clear decision on the future of this work based on the key questions before the Commission:

- iii. Is “processed cheese” a product that is amenable to standardization?
- iv. What would be the rationale and justification for continuing work taking into account—
 - difficulties on securing consensus on core issues;
 - lack of evidence of trade problems;
 - absence of any food safety issues relating to this product;

- the Commission's broader commitment to give priority to food safety related work;
 - the Commission's recognition³ of the need to make a "final effort" to determine if the development of international standard(s) for processed cheese would be feasible; and
 - the resources required for any further physical working group or committee meetings?
- v. If there were to be no international standard, what are the alternative options open to members to deal with the diverse national preferences with regard to product composition and use of stabilizers and thickeners, bearing in mind the wide range of products in trade?

Egypt Position

First we would like to thank the delegations of New Zealand and Uruguay for leading the efforts on drafting a standard for processed cheese

As the Report CL 2016/6-MMP and analysis of responses for its conclusions & recommendations still clearly indicate that no consensus has been reached on core issues (Scope, product description, composition and food additives), these differences are the same issues that have previously impeded advancement of this standard at this step, however Egypt still supports that the committee complete the work to develop an international standard for processed cheese to solve the highlighted issues .

In case no consensus is to be reached, we would go for horizontal standards which is The General Standard for the Use of Dairy Terms and the General Standard for the Labelling of Prepackaged Foods provide guidance on the naming and labelling of processed cheese. These would be referenced in the General standard for processed cheese, as well as other relevant standards for food additives, contaminants and hygiene. Specific labelling requirements for processed cheese and named-variety processed cheese would be added.

We also recognize that the effort at developing an international standard for processed cheese might require a somewhat different approach to those adopted in the past and need to take account of the realities of international market and diversity of national standards and/or preferences.

Agenda Item 17 - Relations between CAC and other international organizations

CX/CAC 16/39/21

Background CAC 32—2009

Conclusions

267. The Commission noted that the proliferation of private standards was of significant concern to many members as compliance with and certification to these standards was difficult, especially for developing countries. The Commission also noted that for food safety matters there was no other international standard setting organization than Codex developing science-based standards in an open, democratic, inclusive and transparent forum. The Commission acknowledged that private standards existed and there was a need to see how they related to Codex standards. The Commission was of the opinion that Codex standards should be benchmarks for these private standards and that international harmonization of food safety provisions should be based on Codex standards.

269. The Commission agreed to monitor the developments on private standards on the basis of discussions in the WTO and that the Commission working in cooperation with the OIE and IPPC should consult on a common strategic position on this matter.

270. The Commission agreed that a study should be conducted to analyses the role, cost and benefits of private standards in a more critical manner especially with respect to the impact on developing countries for consideration by the Executive Committee and the Commission.

271. The Commission also agreed to request the Secretariat to prepare an analysis of the speed of the Codex standard-setting process for consideration by the Executive Committee

Egypt Position

WTO presentation:

Egypt is seeking update for the private standards situation according to the basics mentioned in CAC 32.

Agenda Item 20.2 - Visa issue for attendance at Codex meetings

Recommendation

The Commission is invited to take note of this matter and consider the possibility to appeal to host countries to grant visas on arrival at the airport to delegates from countries where there is no diplomatic representation of the meeting host.

Egypt Position

Egypt propose that FAO office in relevant countries or codex Secretary can send an e mail directly to the relevant embassy of the host country with the names of Delegates who have registered as well as passport number to grant them the visa entry taking into account resolving the challenges in setting appointment with the embassies, Long procedures as well as long timelines. Granting Visas on arrival at the airport might not be a visible solution as for some countries, upon departure the relevant Authorities check the validity of Visa entry to relevant destination.

Agenda Item 21 - Other Business

Halal Update Proposal by Egypt

Referring to the CCFL 43rd Session of the Codex Committee on Food Labelling,

- Based on 36th session of the Codex Alimentarius Commission, Egypt has been requested to prepare a proposal for new work aiming to revise the General Guidelines for Use of the Term "Halal" "CAC/GL 24-1997".
- On CCFL 43; Egypt has prepared a proposal to review and revise Codex General Guidelines For Use Of The Term "Halal", to be discussed as per agenda item 8.
- Through CCFL 43th; A few delegates mentioned that Halal standard should be updated on SMIC level as the right platform for discussing Halal by only Muslim countries (see the final report)
- Egypt would like to clarify the Following points:

According to the Codex procedural manual, section 1 (Rules of procedure of the Codex Alimentarius Commission)(Rule viii voting and procedure) (item 3 . At the request of a majority)

- It is apparent that Codex Guidelines For Use Of The Term "Halal", CAC/GL 24-1997 is International standard and doesn't belong to region or group of countries . Based on the foregoing, who claimed that this standard belongs to only Muslim countries, This is not accepted as the Halal standards is very widely used in International trade , so private standards can negatively impact fair trade & cause challenges to International trade .
- Egypt recognizes that regional standards other than Codex are "private Standards" that do not cover many issues specially:
 - Transparency/ Involvement of key stakeholders in decision-making
 - Stringency of requirements as compared with Codex
 - Costs of certification/ Requirement for multiple certifications
 - Impact on access to markets

Therefore, the Codex Committee on Food Labelling assumes its responsibility to clear those challenges.

The proposed Discussion paper by CCFL to cover consumer preference claims should not include Halal as Halal is a separate issue & not a claim, Halal is a group of procedures which upon fulfillment should be reflected on the labels.

The recommendation to review Codex Halal Guidelines comes originally from Codex Near East committee & was also recognized by Codex Commission

Egypt still highlights the importance of Halal updates in Codex platform as the only International platform to discuss this & clear the challenges for fair trade.