

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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(COMMENTS OF UNITED STATES PHARMACOPEIAL CONVENTION)

Comments Submitted by USP on CRD 26—Proposal on new work on Food Integrity/Food

The U.S. Pharmacopeial Convention (USP) believes that these subjects, particularly when these issues are manifested as Food Adulteration, are extremely important issues that affects trade between countries, consumer confidence in foods, and, most importantly, food safety and public health.

Because of these reasons, we believe that this is a subject on which Codex should consider new work. We recognize, however, the complexity of the subject and are aware that perhaps no single Codex committee has either the mandate or the expertise to completely address the subject.

Key Considerations

USP has had a long standing role in establishing standards for food ingredients. Since 2006, USP has been responsible for establishing food ingredient standards published in the *Food Chemicals Codex*, a compendium of standards that was initiated in 1961 under the leadership of the United States Food and Drug Administration and the Institute of Medicine of the U.S. National Academy of Science. In addition to developing many standards for food ingredients, USP has established several Expert Panels working on various aspects of food adulteration/food fraud since 2009, composed of international experts drawn from industry, academia, and government organizations with expertise in food production, food regulations, auditing, and food analysis. These Expert Panels have produced a Guidance Document on Food Fraud Mitigation, analytical methods to detect fraud in milk powders and other fraud vulnerable food ingredients, guidance on screening methods for detecting food adulteration, and have helped develop the most comprehensive database of known historical and suspected episodes of food fraud. Links to many of these tools can be found at the USP website <http://www.foodfraud.org>.

Based on our previous experience and current insights in this subject we would like to offer these general comments:

1. There are many types of food fraud, but the type that is perhaps of the greatest impact on consumer confidence and public health is the intentional and economically motivated adulteration (EMA) of foods. EMA is defined as the fraudulent addition of non-authentic substances or removal or replacement of authentic substances without the purchaser's knowledge for economic gain of the seller. This is the type of food fraud that has led to the adulteration of milk and protein powders with melamine, the adulteration of fruit juices and honey with lower value constituents, and the adulteration of edible oils with a variety of dangerous industrial chemicals.
2. Mitigation of risks from food fraud requires a collaborative approach throughout the supply chain between all disciplines that are involved in buying, selling, producing, and testing foods.
3. There are no foods that are immune from the risks of fraud, but some foods are more vulnerable due to various factors. These factors include:
 - Supply chains that are more complex and that offer the opportunity for adulteration;
 - Lack of transparency about sourcing, production, or distribution;
 - The failure of auditing systems to account for the vulnerability to food adulteration;
 - The routine use of analytical methods that are not suitable for the detection of food adulteration; and
 - Product shortages and price fluctuations that make food adulteration attractive.

These points and others are covered in great detail in our Guidance Document.

USP Position

Because of the importance of mitigating the risk of food fraud to global trade and public health, USP strongly supports Codex undertaking new work in this area. We have delineated above some of the factors that contribute to vulnerability of food to adulteration. Because vulnerability depends on the interdependence of most of those factors, and because the factors will likely require input from multiple Codex committees, we suggest that Codex consider whether the initial work could be assigned to a Task Force composed of representatives with expertise in methods of analysis, inspection, and food production or assigned jointly to a group of Committees.

Regardless of the course that Codex decides to pursue on the subject of food fraud, USP would be pleased contribute our expertise to this effort.