

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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Comments of Dominica

FINAL ADOPTION OF CODEX TEXTS – COMMENTS (CX/CAC 17/40/3) CCSCH - Standard for Thyme (Draft)

Dominica thanks the Committee for the work done on this proposed Standard.

Dominica has concerns as it relates to 3.2.3 Physical Characteristics, more specifically Table 1 -Physical requirements for dried thyme (allowable tolerances for defects). Like Mexico, we believe that Table 1, in its current state, as it appears in the Standard, provides the same requirements to all Thyme presentations; Whole, broken and ground. We believe that the requirements per parameter should vary based on the level of processing undertaken as per Clause 2.2.

We also suggest the Rodent Contamination should be separated from the Dead insects and Insect fragments parameters. Rodent contaminants (also a pathway for Zoonotics) are not visible; however, Dead insects and Insect fragments maybe visible but presents very minimal risk for transmission of Zoonotics. Therefore in the interest of food safety and consumer protection we wish to suggest the following:

Parameter	Requirements		
	Whole/intact	Crushed/rubbed:	Ground:
Extraneous vegetable matter ¹ , maximum % mass fraction	1	1	1
Foreign matter ² content, maximum % mass fraction	0	0.5	0.5
Mould visible, maximum % mass fraction	0	0	0
Insect damaged leaves/ flowers, maximum % mass fraction	1	1	1
Dead insects, maximum count per Kg	1	0.5	0.5
Insect fragment, maximum count per mass	1	1	1
Rodent contaminant, maximum % mass fraction	0	0	0
Live insects	0	0	0
Mammalian ³ excreta maximum (mg/Kg)	0.25	0.25	0.25

¹Vegetative matter associated with the plant from which the product originates - but is not accepted as part of the final product”

² Any visible objectionable foreign detectable matter or material not usually associated with the natural components of the spice plant; such as sticks, stones, burlap bagging, metal etc”.

³ Mammalian excreta: waste from the body such as feces, saliva or urine eliminated from the body. This category does not include rodents

Like the US, Dominica also believes that defects for “Dead insects” and “insect fragment” should be indicated separately from each other and measured by count per kilogram measured by count per mass, respectively.

Dominica would suggest more technical review should be conducted on this aspect. We support approval of the Standard at Step 8 with the exception of Clause 3.2.3. Clause 3.2.3 should be kept should be held back a Step 5 to enable further discussion.

CCCF - Amendment to the MLs for lead and arsenic in edible fats and oils (fish oils) (CODEX STAN 193-1995)

Dominica supports the approach in aligning the ML for lead (Pb) in fish oils to that of lead (Pb) in edible fats and oils. As reflected in REP17/CF, para 16 Dominica further supports the approach to add a reference to the Standard for Fish Oils to the remarks column of the ML for lead (Pb) in edible fats and oils once the standard is adopted.

Dominica also supports the approach in aligning the ML for arsenic (As) in fish oils to that of the current ML for arsenic (As) in edible fats and oils. The discussion on the subject matter as reflected in REP17/CF, paras 17-18 highlights the concern, and in this regard Dominica considers it appropriate to indicate the ML for fish oils to be specific to inorganic arsenic and to apply a note that total arsenic could be used for screening purposes.

CCCF- MLs for lead in selected processed fruits and vegetables (pulses, jams, jellies and marmalades, preserved tomatoes, canned chestnuts and canned chestnuts puree) (CODEX STAN 193-1995) (Proposed draft and draft)

Dominica thanks the Commission for the opportunity to provide comments.

Dominica maintains its position as reflected in CF11/CRD30. In addition, the subject discussion as reported in REP17/CF, paras 41-89 reiterates the comment that in order to meaningfully contribute to the ML standard setting process, Dominica would need to increase its efforts to undertake and initiate product sampling and analysis as a tangible means of generating much needed data. Nonetheless, it is observed that the general trend is to lower and/or maintain the MLs to limits that would not significantly affect and distort international trade. However, in the absence of data which can be submitted to the GEMS/Food database, Dominica recognizes that it is limited in its ability to participate in the areas of interest to include new proposed MLs for fruit juices and nectars, canned fruits, jams, jellies and marmalades. Notwithstanding the aforementioned, Dominica recognizes that there is wide support to continue working on new MLs for lead (Pb) for a range of categories e.g. tea, herbal infusions, spices, vegetable juices and nectars, etc. In this regard Dominica recognizes and is in support of the importance of this work and the steadfast approach.

CCCF - COP for the prevention and reduction of arsenic contamination in rice (Proposed draft)

Dominica supports the work in developing MLs for Arsenic (As) in rice and pays particular attention to the developing work from a regional perspective since the country is not a producer per se but depends on a sister Caribbean Community (CARICOM) nation for imports through the CARICOM regional treaty on trade¹. Dominica fully participated in the discussion aimed at improving the text of the proposed draft COP and some concerns raised were indeed addressed at the plenary session [CF11/CRD25]. In this regard Dominica supports the move to forward the proposed draft COP for adoption at step 5/8 (with omission of steps 6 and 7).

CCCF - Annex on ergot and ergot alkaloids in cereal grains (annex to the Code of practice for the prevention and reduction of mycotoxin contamination in cereals (CAC/RCP 51-2003))

Dominica has no objections to the adoption of this Standard.

CCCF - COP for the prevention and reduction of mycotoxin contamination in spices (Proposed draft)

Dominica supports the adoption of the proposed draft Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Spices (at Step 5/8). Dominica fully participated in the plenary session as reflected in CF11/CRD30. In this regard documents in circulation to date [CX/CF17/11/11 and CL2017/28-CF] have been reviewed and comments and recommendations captured in [CF11/CRD33 and CF11/CRD26] reflect the EWG recommendations to the CCCF as agreed by all Codex members with the exception of one. Furthermore REP17/CF, para 115 “The Committee agreed to advance the proposed draft COP for the

¹Trade Policy in CARICOM: An overview of the main trade policy areas. http://www.google.dm/url?sa=t&rct=j&q=&esrc=s&source=web&cd=8&ved=0ahUKEwi4kresjrvUAhVKNiYKHf1RDwEQFgHMAc&url=http%3A%2F%2Frepository.cepal.org%2Fbitstream%2F11362%2F3249%2F1%2FLCcarG591_en.pdf&usq=AFQjCN E81bbphUEFeGz9oIS_eoujDF9-cA

prevention and reduction of mycotoxins contamination in spices for adoption at Step 5/8 by CAC40 (Appendix VI) and to discontinue work on specific annexes” and para 116 “The Committee agreed to discontinue work on annexes until further information on management practices specific spices became available” expresses the general sentiment in moving forward.

http://www.google.dm/url?sa=t&rct=j&q=&esrc=s&source=web&cd=8&ved=0ahUKEwi4kresjrvUAhVKNiYKHf1RDwEQFgHMAc&url=http%3A%2F%2Frepositorio.cepal.org%2Fbitstream%2F11362%2F3249%2F1%2FLCcarG591_en.pdf&usg=AFQjCN E81bbphUEFeGz9oIS_eoujDF9-cA