

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 4**

**CX/CAC 19/42/4 Add.1**  
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**Original Language Only**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX ALIMENTARIUS COMMISSION**

**42<sup>nd</sup> Session**

**CICG, Geneva, Switzerland, 8 - 12 July 2019**

**FINAL ADOPTION OF CODEX TEXTS <sup>1</sup>**

## **BACKGROUND**

This document compiles the comments on the Draft Standards and Proposed Draft Standards, at Step 8 and Step 5/8 of the Procedure, submitted through the Codex Online Commenting Systems (OCS) or received via email by the time this document was issued. The comments are as shown in the Appendix I and Appendix II

Appendix I is the compilation of comments through the OCS. The Online Commenting System (OCS) is an online tool that enables contact points to submit comments on draft texts in a standardised way thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

### EXPLANATORY NOTES ON THE APPENDIX I

Structure of Comments

The Comments submitted have been presented in a table format, with each Table divided into the following two Columns as follows:

**First Column** – Provides comments with the rationale.

**Second Column** – Provides comments provider(name of country or observer)

Appendix II is the compilation of comments received via email.

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<sup>1</sup> This document compiles comments submitted through OCS, and via email by the time this document was issued, in reply to CL 2019/59-MAS and CL 2019/60-MAS.

## Appendix I

**Committee on Methods of Analysis and Sampling**  
**Comité sur les méthodes d'analyse et d'échantillonnage**  
**Comité sobre Métodos de Análisis y Toma de Muestras**

**Methods of analysis / performance criteria for provisions in Codex standards**  
**In reply to CL 2019/59-MAS**

*Comments of Peru and Uruguay*

COMMENTS	NAME of Country
<p><b>Observaciones generales</b></p> <p>Perú agradece a la secretaría de la Comisión del Codex Alimentarius por la CL 2019/59/OCS-MAS Solicitud de comentarios. Métodos de análisis para su inclusión en la Norma General para Métodos de Análisis y Muestreo (CXS 234 - 1999).</p> <p>Perú ha revisado las recomendaciones sobre los métodos de análisis propuestos para aprobación y otros asuntos relacionados y considera que están listos para su adopción.</p> <p><b>Observaciones específicas</b></p> <p>El Perú en el marco del Codex Alimentarius con relación a la solicitud contenida en la CL 2019/59/OCS-MAS, no tiene comentarios específicos.</p>	<b>Peru</b>
<p>In Appendix II</p> <p>PART 3. Editorial amendments of METHODS OF ANALYSIS FOR ADOPTION BY CAC42 there are some notes missing: In fact, as indicated in para 17 REP19/MAS1, CCMAS agreed to request that further review of method ISO 5537/IDF 26 should apply to all matrixes. This was included in App II REP 19/MAS as a note in Page 40 for the following commodities: Blend of skimmed milk and vegetable fat in powdered form (water) and Reduced fat blend of skimmed milk powder and vegetable fat in powdered form (water). However, this note shall be also included in the following commodities that appear in page 37 and 38: Blend of skimmed milk and vegetable fat in powdered form (milk protein in MSNF) and reduced fat blend of skimmed milk powder and vegetable fat in powdered form (milk protein in MSNF).</p> <p>1 Paragraph 17 of REP 19/MAS indicates: Concerns were raised on the inclusion of ISO 5537   IDF 26 as the methodology required for determination of moisture was sophisticated, was limited to do analysis in powders, and that other methods were available for such determinations for which validation data were available. To address this concern, CCMAS agreed to request that the further review of methods for moisture should be applicable to all milk and milk products. Further consideration would be given to ISO 5537   IDF 26 method in the next round of the review of the dairy workable package and the table listing those methods requiring review was amended accordingly.</p>	<b>Uruguay</b>

**Preamble and document structure for the General Standard on Methods of Analysis and Sampling (CODEX STAN 234-1999)**

**In reply to CL 2019/60-MAS**

**Comments of Costa Rica, Ecuador, Mexico and Peru**

<b>COMMENTS</b>	<b>NAME of Country</b>
Costa Rica agradece la oportunidad de emitir comentarios. En ese sentido, desea expresar su apoyo al avance del documento.	<b>Costa Rica</b>
Ecuador agradece el trabajo realizado por el Grupo de Trabajo Electrónico y considera apoyar al documento, a fin de que sea remitido a la CAC para su aprobación en su 42° período de sesiones y así poder contar con una norma que proporcione una referencia única de los métodos de análisis y muestreo de alimentos adoptados por la Comisión del Codex Alimentarius, lo que permitirá a las autoridades la selección de métodos apropiados para el análisis y muestreo, así como, la verificación de las disposiciones, criterios o características encontradas en las normas del Codex.	<b>Ecuador</b>
Refer to the ISO / IEC 17025 as standard "ISO / IEC 17025 standard" or "ISO / IEC 17025 current standard".	<b>Mexico</b>
<p><b>Observaciones generales</b></p> <p>Perú agradece a la secretaría de la Comisión del Codex Alimentarius por la CL 2019/60/OCS-MAS Solicitud de comentarios en la etapa 5/8 sobre el anteproyecto de preámbulo y la estructura del documento de la Norma General para Métodos de Análisis y Muestreo (CXS 234 - 1999).</p> <p>Perú ha revisado las recomendaciones del CCMAS contenidas en el párrafo 61 del REP19/MAS y considera que están listos para su adopción en etapa 5/8 el Preámbulo y la estructura de CXS 234 contenido en el Anexo III del REP19/MAS.</p> <p><b>Observaciones específicas</b></p> <p>El Perú en el marco del Codex Alimentarius con relación a la solicitud contenida en la CL 2019/60/OCS-MAS, no tiene comentarios específicos.</p>	<b>Peru</b>

**Committee on Food Hygiene  
Comité sur l'hygiène alimentaire  
Comité sobre Higiene de los Alimentos**

**Alignment of the Code of Practice for Fish and Fishery Products (CXC 52- 2003) with  
Histamine Control Guidance**

***Comments of Ghana, India, Senegal and Tanzania***

**GHANA**

**Position:** Ghana supports the inclusion of the proposed histamine control guidance in Code of Practice of Fish and Fishery Products (CXC 52-2003)

**Rationale:** The amendments and editorial corrections in CXC 52-2003 will provide consistency with the histamine control guidance adopted by CAC41.

**INDIA**

**Comment:** India supports the final adoption of this CoP.

**SENEGAL**

**Contexte:** Les orientations sur la maîtrise de l'histamine élaborées par CCFH ont été adoptées par CAC41.

À la 50<sup>e</sup> session, le comité devait identifier un emplacement approprié pour les orientations sur la maîtrise dans CXC 52-2003 et examiner si l'inclusion d'une nouvelle orientation nécessiterait une modification d'autres sections du CXC 52-2003 qui contiennent des orientations techniques sur l'histamine.

Le comité a approuvé la proposition d'alignement du GTE avec des modifications rédactionnelles mineures et une modification proposée par la Norvège concernant le poisson salé.

**Position:** Le Sénégal appuie l'insertion du projet d'orientation sur le contrôle de l'histamine dans le Code d'usages pour les poissons et les produits de la pêche (CXC 52-2003).

**Justificatif :** les modifications et les corrections éditoriales faites dans CXC 52-2003 assureront la cohérence avec les orientations sur la maîtrise de l'histamine adoptées par la CAC41.

**TANZANIA**

**Position:** Tanzania supports the placement of the proposed histamine control guidance in Code of Practice of Fish and Fishery Products(CXC 52-2003).

**Rationale:** The amendments and editorial corrections in CXC 52-2003 will provide consistency with the histamine control guidance adopted by CAC41.

**Committee on Spices and Culinary Herbs  
Comité sur les épices et les herbes culinaires  
Comité sobre Especies y Hierbas Culinarias**

**Proposed draft Standard for dried or dehydrated garlic**

***Comments of Ghana and Tanzania***

**GHANA**

**Position:** Ghana supports adoption of the proposed draft standard for dried or dehydrated garlic

**Rationale:** Garlic is one of the most widely used spices in the world. Having international standard for this product will contribute to safe trade in dried or dehydrated garlic.

**TANZANIA**

**Position:** Tanzania supports adoption of the proposed draft standard for dried or dehydrated garlic.

**Rationale:** Garlic is one of the most widely used spices in the world. Having international standard for this product will contribute to safe trade in dried or dehydrated garlic.

**Committee on Fats and Oils  
Comité sur les graisses et les huiles  
Comité sobre Grasas y Aceites**

**Proposed draft revision to the Standard for Named Vegetable Oils (CXS 210-1999): Applicability of the fatty acid composition of other oils listed in Table 1 in relation to their corresponding crude form and consequential deletion of an equivalent note for rice bran oil**

*Comments of India*

**INDIA**

Comment: India supports the proposal for the final adoption.

**Proposed draft revision to the Standard for Named Vegetable Oils (CXS 210-1999): Inclusion of Free Fatty acids as quality characteristic criteria for refined rice bran oil**

*Comments of India*

**INDIA**

Comment: India supports the proposal for the final adoption.

**Proposed revision to the Standard for Named Vegetable Oils - Replacement of Acid Value with free fatty acids for Virgin Palm oil and inclusion of Free fatty Acids for Crude Palm Kernel Oils**

*Comments of India*

**INDIA**

Comment: India supports the proposal for the final adoption.

**Committee on Food Additives  
Comité sur les additifs alimentaires  
Comité sobre Aditivos Alimentarios**

**Proposed draft Specifications for the Identity and Purity of Food Additives arising from the 86th JECFA meeting**

*Comments of Ghana*

**GHANA**

**Position:** Ghana supports the recommendations.

**Rationale:** Scientific evaluations conducted by JECFA indicated no adverse health effect of the additives.

**Draft and proposed draft food-additive provisions of the General Standard for Food Additives (GSFA) (CXS 192- 1995)**

*Comments of Senegal*

**SENEGAL**

**Contexte :** Le CCFA51 a recommandé l'adoption des dispositions suivantes relatives aux additifs alimentaires aux étapes 8 et 5/8 par la CAC 42

- Avant-projet de dispositions pour les graines de tamarinier polysaccharide (SIN 437) et la gomme de ghatti (SIN 419) dans le tableau 3 pour adoption à l'étape 5/8

- Projet et avant-projet de dispositions relatives aux colorants dans le processus par étapes dans les catégories d'aliments 05.2 (Confiseries, y compris les bonbons durs et moelleux, nougats, etc. autres que celles mentionnées aux catégories 05.1, 05.3 et 05.4), 05.3 (Gomme à mâcher), 05.4 (Décorations (par ex. pour boulangerie fine), nappages (autres que celles à base de fruits) et sauces sucrées
- Dispositions dans les tableaux 1 et 2 de la NGAA dans les catégories d'aliments 14.1.4 et 14.1.5 (pour adoption à l'étape 8)
- Catégories d'aliments no 14.1.4 Boissons aromatisées à base d'eau, y compris les boissons pour "sportifs", les boissons "énergétiques" ou "électrolytes", et les boissons concentrées

Projet et avant-projet de dispositions dans les tableaux 1 et 2 de la NGAA dans les catégories d'aliments 01.0 jusqu'à 16.0 à l'exception des additifs ayant des fonctions technologiques de colorant (à l'exclusion des dispositions débattues au point (j)) ou d'édulcorant, adipates, nitrites et nitrates, les dispositions de la catégorie alimentaire 14.2.3 et ses sous-catégories, et les dispositions dans l'attente d'une réponse du CCSC, CCPFV ou CCFO2 (pour adoption à l'étape 5/8 et 8).

**Position:** Le Sénégal appuie les propositions d'adoption de ces dispositions.

**Justificatif :** Les normes de produit se référant au tableau iii de la NGAA sont classées comme ayant une DJA non spécifiée, les données disponibles pour les autres produits n'indiquent aucun problème de sécurité.

**Revision of the Class Names and the International Numbering System for Food Additives (CXG 36-1989) (Proposed draft)**

**Comments of Ghana and Senegal**

**GHANA**

**Position:** Ghana supports the proposed draft revisions.

**Rationale:** Red 2G does not have a JECFA ADI and as such, all provisions for Red 2G in the step process in GSFA should be discontinued.

**SENEGAL**

**Contexte :** Lors du CCFA51 un GT de la session sur le SIN a formulé des recommandations sur le retrait de quatre additifs du SIN; la modification de catégories fonctionnelles et des objectifs technologiques des additifs du SIN; l'attribution d'un numéro du SIN à l'extrait riche en  $\beta$ - carotène de *Dunaliella salina* donc la révision des sections 3 et 4

1. Sup. des noms et des num du SIN ex. 128 Rouge 2G et 1411 glycérol de di-amidon
2. Modifications des catégories fonctionnelles et des objectifs technologiques du copolymère méthacrylate basique, no SIN 1205 de l'agent de glaçage à l'agent d'enrobage ou de transport.
3. Changement du nom des carotènes d'algue à extrait riche en  $\beta$ -carotène de *Dunaliella salina* SIN 160a(iv)

**Position :** Le Sénégal soutient les révisions proposées.

**Justificatif:** Le BMC permet d'encapsuler un large éventail de micronutriments dans un revêtement protecteur qui empêche la dégradation pendant la cuisson et le stockage.

Le BMC prévient également l'interaction entre les micronutriments qui pourrait réduire leur efficacité.

Le Rouge 2G n'a pas une DJA de la JECFA et, à ce titre, toutes les dispositions sur le Rouge 2G dans le processus par étape devraient être interrompues.

**Revised food-additive provisions of the GSFA in relation to the alignment of the thirteen standards for milk and milk products (ripened cheese), two standards for sugars, two standards for natural mineral waters, three standards for cereals, pulses and legumes and three standards for vegetable proteins**

**Comments of Tanzania**

**TANZANIA**

**Position:** Tanzania supports the adoption of this item.

**Rationale:** The work is necessary to ensure alignment of the food additives provisions of commodity standard with the GSFA as the single authoritative reference document for food additives.

**Revised food-additive provisions of the GSFA in relation to the alignment of provisions for ASCORBYL ESTERS (ascorbyl palmitate (INS 304) and ascorbyl stearate (INS 305)) and the Standards for Infant Formula and Formula for Special Dietary Purposes Intended for Infants (CXS 72-1981) and Follow-up Formula (CXS 156-1987)**

*Comments of Ghana and Tanzania*

**TANZANIA**

**Position:** Tanzania supports the adoption of the revisions on alignment of food additive provisions.

**Rationale:** All the food additive provisions in all the CODEX commodity standards should always refer to the respective provisions in the GSFA as the single reference source.

**GHANA**

**Position:** Ghana supports the adoption of the revisions on alignment of food additive provisions.

**Rationale:** The food additive provisions in all the CODEX commodity standards should always refer to the respective provisions in the GSFA as the single reference source.

**Revised food-additive provisions of the GSFA in relation to the replacement notes to Note 161*****Comments of Ghana and Tanzania*****GHANA**

**Position:** Ghana supports the adoption of the proposed Note A if it will directly refer to consistency with Section 3.2 on the justification for use of food additives which could bring about alignment of standards especially to special dietary needs.

**Rationale:** The original text of Note 161 has an important element referencing consistency with Section 3.2 as a whole to guide Codex members on the justification for use of food additives. This important element has been lost in the proposal. Since the issue in question was on the phrase “subject to national legislation of the importing country” then consistency to 3.2 remains important.

Proposal ii) of the committee states “that the alternative notes would be considered for both the adopted provisions and provisions in the step procedure and subject to the intended function of the additive. This aspect “subject to the intended function of the additive” is missing in the proposed note.

**PROPOSED REVISED TEXT****Recommendation 1**

**“Consistent with Section 3.2 of the preamble, to provide for the intended function of the additive,** some Codex members allow use of additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars”.

**NOTE B**

Adoption of the proposed Note B can NOT be supported as it provides for use of additive with sweetener function and flavor enhancer function. This poses a high risk of bringing about inconsistency with Section 3.2 on the justification for use of food additives especially to special dietary needs.

Both Note A and Note B are meant to bring about compromise for those objecting removal of Note 161. The aspect of special dietary needs is very crucial especially for developing countries where consumers still need protection from regulatory bodies to make right choices of what they need to take.

**TANZANIA**

**Position:** Tanzania support adoption of the proposed Note A if it will directly refer to consistency with Section 3.2 on the justification for use of food additives which could bring about alignment of standards especially to special dietary needs.

**Rationale:** The original text of Note 161 has an important element referencing consistency with Section 3.2 as a whole to guide Codex members on the justification for use of food additives. This important element has been lost in the proposal. Since the issue in question was on the phrase “subject to national legislation of the importing country” then consistency to 3.2 remains important.

Proposal ii) of the committee states “that the alternative notes would be considered for both the adopted provisions and provisions in the step procedure and subject to the intended function of the additive. This aspect “subject to the intended function of the additive” is missing in the proposed note.

**PROPOSED REVISED TEXT****Recommendation 1**

**“Consistent with Section 3.2 of the preamble, to provide for the intended function of the additive,** some Codex members allow use of additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars”.

**NOTE B**

Adoption of the proposed Note B can NOT be supported as it provides for use of additive with sweetener function and flavor enhancer function. This poses a high risk of bringing about inconsistency with Section 3.2 on the justification for use of food additives especially to special dietary needs.



Both Note A and Note B are meant to bring about compromise for those objecting removal of Note 161. The aspect of special dietary needs is very crucial especially for developing countries where consumers still need protection from regulatory bodies to make right choices of what they need to take.

**Revised food-additive sections of the three standards for cereals, pulses and legumes and three standards for vegetable proteins, i.e. Standards for Wheat flour (CXS 152-1985); Couscous (CXS 202-1995); and Instant noodles (CXS 249-2006); and Wheat protein products including wheat gluten (CXS 163-1987); Vegetable protein products (VPP) (CXS 174- 1989); and Soy protein products (CXS 175-1989)**

### *Comments of Ghana*

#### **GHANA**

**Position:** Ghana supports the adoption of the amendments of the food additives sections of the listed standards.

**Rationale:** There is the need to amend the old food additive sections of the respective standards, once alignment of the provisions in the GSFA has been completed for consistency.

**Committee on Pesticide Residues  
Comité sur les Résidus de Pesticides  
Comité sobre Residuos de Plaguicidas**

**MRLs for different combinatins of pesticide/commodity(ies) for food and feed**

### *Comments of European Union and Ghana*

#### **EUROPEAN UNION**

##### **General comment**

The European Union (EU) supports the adoption of all the proposed draft MRLs in Appendix II of REP 19/PR with the exception of the draft MRLs for the substances/commodities below for which the EU requests that its **reservations** are included in the report of CAC 42.

The EU has a policy in place whereby EU MRLs will be aligned with Codex MRLs if three conditions are fulfilled: (1) that the EU sets MRLs for the commodity under consideration, (2) that the current EU MRL is lower than the CXL, and (3) that the CXL is acceptable to the EU with respect to areas such as consumer protection, supporting data, and extrapolations. Reservations address the cases where the EU considers the third criterion not to be met, with the aim of increasing transparency and predictability regarding the impact of the work of the Codex Alimentarius Commission on EU legislation.

##### **Diquat (031)**

Reservation of the EU on the advancement of the proposed MRLs for barley; chick-pea (dry); dry beans (subgroup); dry peas (subgroup); mammalian fats (except milk fats); poultry fats; rye; and triticale because of toxicological concerns on metabolites.

##### **Imazalil (110)**

Reservation of the EU on the advancement of the proposed MRLs for lemons and limes (subgroup); oranges, sweet, sour (subgroup); banana; potato; and edible offal (mammalian), pending the outcome of their ongoing evaluation of toxicological properties of several metabolites and because they had identified an acute consumer risk for potato.

##### **Propamocarb (148)**

Reservation of the EU on the advancement of the proposed MRLs for edible offal (mammalian); mammalian fats (except milk fats); meat from mammals (other than marine mammals) and milks due to the different residue definition for enforcement.

##### **Propiconazole (160)**

Reservation of the EU on the advancement of all the proposed MRLs since propiconazole had not been approved in the EU due to toxicological data gap for several metabolites.

**Bentazone (172)**

Reservation of the EU on the advancement of the proposed MRLs for dry beans, subgroup of; dry peas, subgroup of; edible offal (mammalian); mammalian fats (except milk fats); meat (from mammals other than marine mammals); milks due to the different residue definition for plant and animal commodities for enforcement in the EU.

**Abamectin (177)**

Reservation of the EU on the advancement of the proposed MRLs for cane berries (subgroup), grapes, green onions (subgroup) and herbs (subgroup excluding mints) due to the different residue definition for enforcement in the EU.

**Pyraclostrobin (210)**

Reservation of the EU on the advancement of the proposed MRLs: for lettuce, head and pome fruits due to acute risk concern; for edible offal (mammalian); mammalian fats (except milk fats); meat (from mammals other than marine mammals) and milks since a feeding study should have been considered, and for tea, green, black (black, fermented and dried) due to insufficient number of residue trials.

**Fludioxonil (211)**

Reservation of the EU on the advancement of the proposed MRLs for celery; green onions (subgroup); leaves of Brassicaceae (subgroup); pineapple and pomegranate, pending the outcome of the ongoing periodic re-evaluation in the EU.

**Fluopyram (243)**

Reservation of the EU on the advancement of the proposed MRL for rice, husked, due to the ongoing MRL review in the EU and the insufficient number of processing studies.

**Chlorfenapyr (254)**

Reservation of the EU on the advancement of all the proposed MRLs for food commodities except peppers, chili, dried due to the different risk assessment approach regarding the use of correction factors to estimate metabolite residue levels, and because of their acute intake concern for tea.

The EU requests clarification on the MRL for chlorfenapyr in fruiting vegetables, cucurbits at 0.3 mg/kg proposed for adoption at Step 5/8, which is missing from the JMPR 2018 Report and whether this proposed MRL should be adopted by CAC42 at all.

**Cyazofamid (281)**

Reservation of the EU on the advancement of the proposed MRL for green onions as the EU extrapolation policy supported an MRL of 2 mg/kg for the subgroup of green onions (subgroup except chives), and 6 mg/kg for chives only.

**Oxathiapiproline (291)**

Reservation of the EU on the advancement of the proposed MRLs for all primary food commodities of plant origin pending the outcome of their ongoing evaluation of the toxicological properties of metabolite IN-WR791 and the advancement of the proposed MRLs for animal commodities because of their different livestock dietary burden estimation.

**Ethiprole (304)**

Reservation of the EU on the advancement of the proposed MRLs for coffee beans; edible offal (mammalian); eggs; mammalian fats (except milk fats); meat (from mammals other than marine mammals); milks; poultry meat; poultry, edible offal of; poultry fats; and rice, husked due to the ongoing EU assessment of toxicological data.

**Norflurazon (308)**

Reservation of the EU on the advancement of the proposed MRLs for edible offal (mammalian); eggs; mammalian fats (except milk fats); meat (from mammals other than marine mammals); milks; poultry fats; poultry meat; poultry, edible offal of, due to the overall poor quality of the toxicological studies, the lack of data on the genotoxic potential of metabolite (NOA-452075) and the lack of a reliable calculation of the livestock dietary burden.

**Pydiflumetofen (309)**

Reservation of the EU on the advancement of the proposed MRL for small fruit vine climbing, pending the outcome of the ongoing evaluation in the EU.

**Tioxazafen (311)**

Reservation of the EU on the advancement of the proposed MRLs for cotton seed; edible offal (mammalian); eggs; maize; mammalian fats (except milk fats); meat (from mammals other than marine mammals); milks; poultry meat; poultry, edible offal of; poultry fats; and soya bean (dry) pending the outcome of the ongoing evaluation in the EU.

**GHANA**

**Position:** Ghana supports the adoption of Proposed Draft MRLs at Step 5/8 REP19/PR Para. 145, Appendix II

**Rationale:** Estimation of MRLs were based on residue data set obtained from trials conducted according to GAP. Dietary exposure levels of the compound were below the respective Acceptable Daily Intake (ADI) or Acute Reference Dose (ARfD)

**Revision of the Classification of Food and Feed (CXM 4-1989): Miscellaneous commodities not meeting the criteria for crop grouping**

***Comments of Ghana***

**GHANA**

**Position:** Ghana supports the proposal by CCPR51 for the adoption by CAC42 Class A : Type Miscellaneous Primary Food Commodities of Plant Origin and the proposed format and codes

**Rationale:** This will enable the setting of MRLs for the commodities in this class not meeting the following criteria:

- Similar potential for pesticide residues
- Similar morphology
- Similar production practices
- Similar edible portion
- Similar residue behaviour
- Flexibility to set subgroup MRLs

**Committee on Contaminants in Foods**  
**Comité sur les contaminants dans les aliments**  
**Comité sobre Contaminantes de los Alimentos**

**Proposed draft revised maximum levels for lead in selected commodities in the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995)**

***Comments of Ghana and Senegal***

**GHANA**

**Position:** Ghana supports the recommendation of lowering the maximum levels for lead in wines and edible offal from cattle, pig and poultry, as proposed by CCCF13.

**Rationale:** The approved MLs for wines are achievable, available data indicate that levels of lead in wines are far below 0.05mg/L. Lowering the levels would protect the health of consumers without affecting trade.

The maximum levels for edible offal were proposed without data from Ghana but considering the significant import of edible offal to Africa and the need to promote public health and facilitate international trade, we support the proposed limits.

**SENEGAL**

**Contexte:** Le CCCF 13 a formulé pour adoption les propositions suivantes :

- Réduire la LM de 0,2 mg/kg à 0,1 mg/kg pour les vins
- Etablir une LM de 0, 15 mg/kg pour les liqueurs/ vins fortifiés
- Réduire les LM des abats comestibles de:
  - bovin : 0,5 mg/kg à 0,2 mg/kg
  - cochon: 0,5 mg/kg à 0,15 mg/kg
  - volaille: 0,5 mg/kg à 0,1 mg/kg

**Position :** le Sénégal soutient les LM proposées par le Comité pour adoption.

**Justificatif :** Les LMs pour les produits ciblés sont réalisables pour le Sénégal et peuvent contribuer à protéger la santé publique.

**Proposed draft maximum level for cadmium for chocolates containing or declaring <30% total cocoa solids on a dry matter basis at Step 5/8**

***Comments of Ghana***

**Position:** Ghana does not support adoption of ML of 0.3 mg/kg for chocolate products containing or declaring <30% total cocoa solids on a dry matter.

**Rationale:** Cadmium contamination in food is a concern in many countries. The metal can accumulate in the kidneys leading to irreversible tubular renal dysfunction. Although JECFA indicated that cadmium in cocoa and cocoa based products could not pose a health concern, it still estimated a PMTDI for cadmium of 25 µg / kg bw per month. Cadmium content in the data from Africa used for the analysis of occurrence of cadmium in chocolates (<30% of total cocoa solids) ranged from 0.01 - 0.02 mg/kg.

The low levels of cadmium in chocolate from Africa, reflects the use of good agricultural practices, good manufacturing practices and good hygienic practices.

Setting an ML of 0.3 mg / kg, which is 15 folds higher than the highest (0.02mg/kg) determined in chocolates from Africa, will jeopardize the efforts by African countries. Since Africa accounts for 75% of global production for cocoa and 93% of cocoa imports to Europe, adopting such a higher limit will consequently discourage efforts to prevent cadmium contamination in cocoa in Africa and in the long run be detrimental to African countries.

**Draft Code of practice for the reduction of 3-monochloropropane-1,2-diol esters (3-MCPDEs) and glycidyl esters (GEs) in refined oils and food products made with refined oils (at Step 8)**

***Comments of Ghana***

**GHANA**

**Position:** Ghana supports the adoption of the Code of Practice for 3-MCPDE and GE.

**Rationale:** The draft code has been modified to include all refined oils (including fish oil) and not only vegetable oils. Further changes were made based on technical submissions and in addition, some editorial changes were introduced. The COP is relevant to African refiners and should be adopted.

**Draft Guidelines for rapid risk analysis following instances of detection of contaminants in food where there is no regulatory level (at Step 8)**

***Comments of Ghana***

**GHANA**

**Position:** Ghana supports the adoption of the Guidelines.

**Rationale:** The draft guidelines have been extensively clarified and improved and the current document is readily understandable. The decision tree is also easy to follow. All reference to the term “emerging” has been removed and the chemicals to which the guidelines apply are clearly delineated, as are those excluded. The derivation of the “cut-off value” at 1 µg/kg is also clearly explained and justified by example.

**Committee on Cereals, Pulses and Legumes (CCCPL)  
Comité du Codex sur les céréales, les légumes secs et les légumineuses  
Comité del Codex sobre Cereales, Legumbres y Leguminosas**

**The draft two sections in the Standard for Quinoa**

***Comments of India, Peru and Uruguay***

**INDIA**

**Comment:** India supports the final adoption of the draft two sections of the standard for Quinoa.

**PERU**

**PROYECTO DE LA SECCIÓN 3.2.1. CONTENIDO DE HUMEDAD Y LA SECCIÓN 3.2.7. TAMAÑO DE LA NORMA PARA LA QUINUA (Ref.: CL 2019/42-CPL Anexo 2, en el trámite 8)**

El Perú expresa su conformidad con la adopción del contenido de humedad de un 13,0 %. Asimismo, expresa su conformidad con la eliminación de la disposición sobre el tamaño del grano.

Perú agradece a los Estados Unidos de América, como país anfitrión del Comité del Codex sobre Cereales, Legumbres y Leguminosas (CCCPL), por el informe sobre la elaboración de las dos secciones de la norma para la quinua, así como la recomendación (párrafo 14 de la CL 2019/42-CPL):

*“Se recomienda que la CAC, en su 42.º período de sesiones, adopte el contenido de humedad de un 13,0% con la nota que reza: “Para determinados destinos, por razones de clima, duración del transporte y almacenamiento, deberían requerirse límites de humedad más bajos. Se pide a los gobiernos que acepten esta Norma que indiquen y justifiquen los requisitos vigentes en su país” en el trámite 8 y se suprima la disposición sobre el tamaño del grano como se indica en los párrafos 9, 10 y 12.”*

**Importancia de la quinua y las secciones pendientes de elaboración**

La quinua es una planta andina cuya mayor diversidad genética se encuentra en la cuenca del lago Titicaca, ubicado entre el Perú y Bolivia. A la fecha este grano andino es ampliamente reconocido a nivel mundial por su rusticidad agronómica y alto valor nutricional, siendo cultivado en la actualidad en América, Europa, Asia y África. El Perú es el primer exportador mundial de granos de quinua, con un crecimiento sostenido desde el año 2005. El año 2018 se exportaron más de 50 000 toneladas de granos de quinua, equivalentes a más de

US\$ 121 millones, lo cual representa el 42 % de la participación en las exportaciones mundiales. En el 2018 nuestros principales destinos de exportación de granos de quinua fueron los Estados Unidos, Canadá, Países Bajos, Reino Unido, Francia, Italia, España, Alemania, Brasil, Chile, Australia, Israel, Rusia, Bélgica, México, entre otros.

Es importante recordar que la finalidad de las normas de Codex Alimentarius es proteger la salud del consumidor, así como favorecer su armonización y, de esta forma, facilitar el comercio internacional. Por ello, la norma Codex de Quinua debe proteger la salud de los consumidores y facilitar el comercio de la Quinua a nivel internacional. En ese sentido, el requisito de tamaño no es el factor crucial relacionado con la inocuidad alimentaria. El tamaño específico de la quinua podría ser abordado por el contrato comercial entre las partes, razón por lo cual el Perú está de acuerdo con su eliminación.

## **URUGUAY**

**Comment:** PROYECTO DE LA SECCIÓN 3.2.1. CONTENIDO DE HUMEDAD Y LA SECCIÓN 3.2.7. TAMAÑO DE LA NORMA PARA LA QUINUA

Respecto a los dos puntos en consulta sobre la NORMA PARA LA QUINUA, Uruguay considera:

Compartimos la propuesta de redacción del punto 3.2.1 – Contenido de Humedad,

Respecto al punto 3.2.7 Tamaño, consideramos que debe incluirse en la norma la tabla de tamaños tal como esta propuesta.

Tamaño del grano	Rango mm
Extra grande	Mayor de 2,0 mm
Grande	Mayor de 1,7 hasta 2,0 mm
Mediano	De 1,4 a 1,7 mm
Pequeño	Menor de 1,4 mm