

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 4.2, 4.5, 4.6 and 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-fifth Session

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Comments of India

AGENDA ITEM 4.2: CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES.

Part-1- Draft Guidelines for Ready-to-Use Therapeutic Foods (RUTF)

Comments: India would like to thank and appreciate to the CCNFSDU for the outstanding work done. However, we would like to give the following comments:

On the preamble:

- Inclusion of reference to the International Code of Marketing of Breast milk Substitutes and subsequent relevant WHA resolutions preamble.

On the nutrients table:

- If the use of RUTF in national/sub-national programme for the management of Severe Acute Malnutrition is approved by the national authorities, these formulations should meet the relevant country specific recommendations for Essential composition as specified by the National Authorities. Therefore, it is suggested that a footnote should be inserted under the recommendations for Nutrient (macronutrients as well as micronutrients).

The text of the footnote is "*Competent national and/or regional authorities may recommend own nutrients levels, as appropriate for the nutritional needs of their population.*"

Rationale:

- The recommendation for free sugar in RUTF as per these guidelines is "should not exceed 20%" whereas WHO Guidelines for Sugar intake for adults and children recommend this to be not more than 10% and hence India is of the opinion that free sugars should be limited and should not exceed 10% of total energy.
- The proposed energy density (5.2 - 5.5 kcal per gram) is very high and may not be required for community-based feeding. The energy requirement for catch-up growth during rehabilitation of children with SAM is based on several considerations, viz., desired composition of weight gain (Fat free mass: Fat Mass ratio of 70:30 or 50:50) and rate of catch-up growth (5-10 g/kg/day).
- The limit of sodium is also high which is against the policy to reduce the sodium intake.

AGENDA ITEM 4.5: CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Part 1 – Standards and related texts submitted for final adoption

Maximum levels for lead in cereal-based foods for infants and young children, white and refined sugar, corn and maple syrups, honey and sugar-based candies.

Comments:

India support the adoption of the MLs as proposed except in case of lead in sugar.

Rationale:

- India does not support the proposed ML of 0.1mg/kg for Lead in sugar as our data supports the ML of 0.35mg/kg.
- This proposed ML would be very stringent and will have impediments in the international trade as most of the international and national standards have established an ML of 0.5 mg/kg and 0.2 mg/kg for white and refined sugars based on the national data.
- More data would be needed to set an ML that is geographically representative to ensure global achievability.
- Further, the implementation of the recently revised Code of practice for the prevention and reduction of lead contamination in foods (CXC 56-2004) would further assist in reducing lead contamination sources and allow for the establishment of lower ML. after a period of five years.
- Hence we request the commission not to adopt the said ML and the may be returned for considering more geographically representative data.

Maximum levels for total aflatoxins in maize grain, destined for further processing; flour meal, semolina, and flakes derived from maize; husked rice; polished rice; sorghum grain, destined for further processing; cereal-based food for infants and young children (excluding foods for food aid programs), and cereal based food for infants and young children for food aid programs.

Comments:

India support the adoption of the of MLs as proposed except in case of aflatoxin in polished rice.

Rationale:

- India is not in favour of adopting the proposed ML of 5 ppb for aflatoxin in polished rice as it did not covers the data of rice producing countries which represents geographically.
- As per the report of EWG Most samples analysed came from three countries: Thailand (38.8%), the European Union (21.7%) and USA (14.2%) and it did not represent the more rice producing countries. From that only one country is major rice producing country and others are less or importer of the polished rice.
- Data from rice producing countries is almost negligible. Data from tropical countries representing various agro climatic regions which are major rice producers should be considered since the agro climatic conditions for production and post-harvest storage are significant deciding factors for aflatoxins levels. The proposed levels of MLs for aflatoxins, based on non-representative data set, may lead to serious trade implications.
- Hence we request the commission to consider the proposed ML of 5 ppb for aflatoxin in polished rice should be returned or adopted at step 5 to allow additional more data from the rice producing countries and to have geographical representation. Such decision of recommending to step 5 also taken in case of Maximum level for lead in ready-to-eat meals for infants and young children due to more clarity.

Part 2 – Standards and related texts submitted for adoption at Step 5

- Maximum level for lead in ready-to-eat meals for infants and young children Code of practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products**
- Code of practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products**

Comments: India supports the proposed texts at step 5 for adoption.

AGENDA ITEM 4.6: CODEX COMMITTEE ON PESTICIDE RESIDUES

Part 1 – Standards and related texts submitted for final adoption

- Guidelines for the recognition of active substances or authorized uses of active substances of low public health concern that are considered exempt from the establishment of Codex MRLs or do not give rise to residues**
- MRLs for different combinations of pesticide/commodity(ies)**
- Revision of Classification of Food and Feed (CXA 4- 1989): definitions for edible offal, fat, meat and muscle, including the definitions for the portion of the commodity to which MRLs apply**

and which is analyzed for fat and muscle Revision of the Classification of Food and Feed (CXA 4- 1989):

- D. Consequential amendment to Class D, Processed Food of Plant Origin. Inclusion of additional commodities for citrus fruits pulps (dried) and oils (edible) and soya flour

Comments:

India supports the adoption of these documents at step 8 and 5/8.

Part 3 – Codex standards and related texts proposed for revocation:

- A. CXLs for different combinations of pesticide/commodity(ies) proposed for revocation.

Comments:

- India does not support the revocation of the pesticide *Chlorpyrifos*.

Rationale:

- At present the production and use of this pesticide for various crops are more and also used in control of Locusts.
- The revocation of this pesticide will have an impact on the global trade and issues concerning trade of various commodities including the food security.
- There will be a great commercial loss to the country in terms of foreign exchange (Rs 600 – 700 crores) and also to the technical manufacturers, formulators, retailers, distributors, workers/laborers and the farmers to the tune of Rs 1400 – 1500 crores.
- In this regard, India has submitted the toxicological data to the JMPR for evaluation and consideration for the upcoming meeting of JMPR probably on December and hence till the outcome of evaluation, the revocation of the MRL of the pesticide *Chlorpyrifos* should be deferred.
- It is agreed that the public health concern is there, however, there should be transition time to avoid major losses and global trade implication.

AGENDA ITEM 6: OTHER MATTERS RELATED TO CODEX SUBSIDIARY BODIES

A. Revision of the Standard for Kimchi (CXS 223-2001)

India supports the proposal for revision of the Standard for Kimchi (CXS 223-2001) as the existing standard for Kimchi is old (Adopted in 2001 and Amended in 2017). We support further revision of the standard considering innovations and latest update in the field of Food Technology.

We wish to propose while supporting the document, we request the Committee to reactivate CCPFV which is currently adjourned sine die to work on this new work proposal as well as the two work proposals (viz. Cashew kernels and dried sweet potatoes) which were already approved by CAC.

B. Proposed amendment of the General Standard for Fruit Juices and Nectars (CXS 247-2005)

India supports the proposal for amendment of the General Standard for Fruit Juices and Nectars (CXS 247-2005) and same may be taken up at the CCPFV.

C. Proposal for revision of the Standard for Milkfat Products (CXS 280-1973)

India does not support either Option 1 or Option 2 proposed by Iran. It is proposed to not make any changes to the Standard for Milkfat Products (CXS 280-1973).

The Standard for Milkfat Products (CXS 280-1973) has a section in Appendix – Additional Information with the heading “2. Other Contaminants” and that this section sets out limits for copper and iron in Anhydrous Milkfat, Milkfat, Anhydrous Butter Oil, Butter Oil, and Ghee.

The explanatory text for the Appendix reads as follows:

The additional information below does not affect the provisions in the preceding sections which are those that are essential to the product identity, the use of the name of the food and the safety of the food.

This text explains that these limits are not mandatory limits. Therefore, there is no issue of non-compliance if these limits are not met. The new work proposal refers to non-compliance of these limits and hence appears to presume that these are mandatory.

These limits are quality factors that provide guidance for the quality of milkfat products. Oxidation of milkfat results in a deterioration of flavour. Iron and copper are well-known to catalyze the oxidation of milkfat and hence these limits may be retained.