

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4, 5, 7

CAC/42 CRD19
Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-second Session

CICG, Geneva, Switzerland, 8 - 12 July 2019

Comments of Uganda

Agenda Item 4: FINAL ADOPTION OF CODEX TEXTS

CODEX COMMITTEE ON SPICES AND CULINARY HERBS

Proposed draft standard for dried or dehydrated garlic REP19/SCH Para. 47, Appendix IV, Step 8

Uganda appreciates the work done by CCSC in advancing work for products already in trade. We take note of the exhaustive discussions undertaken at the Committee and alignment of text in the proposed draft to the agreed layout. Considering the significant volumes of international trade for the commodity, Uganda supports the adoption of the proposed standard for dried or dehydrated garlic.

CODEX COMMITTEE ON FOOD ADDITIVES

Proposed draft Specifications for the Identity and Purity of Food Additives arising from the 86th JECFA meeting REP19/FA Para. 26, Appendix III Part A at Step 5/8

Uganda notes the progress made by CCFA in relation to development of specifications for the identity and purity of food additives. Uganda supports the adoption at step 5/8 of the full food additive specifications as recommended by CCFA following robust scientific evaluation conducted by JECFA which demonstrated no adverse health effects of the additives.

Draft and proposed draft food-additive provisions of the General Standard for Food Additives (GSFA) (CXS 192- 1995) REP19/FA Para. 137 (i), Appendix VI Part A Step 8 and 5/8

Whereas Uganda supports adoption of draft provisions for the specified commodities as well as colours in the step process for the specified food categories, we do not support the provision for trisodium citrate in FC 01.1.1 (Fluid milk (plain)) as the addition of additives in the food category is not technologically necessary and may result in changing the nature of the product. The treatment during the processing of milk is sufficient hence limiting the need to use acidity regulators.

Uganda further does not support inclusion of the additives listed in FC 01.1.2 (other fluid milks (plain)). Our position is premised on the fact that addition of additives in these food categories could potentially mislead the consumer as the additives could also have other technological functions such as thickening properties.

CODEX COMMITTEE ON PESTICIDE RESIDUES

MRLs for different combinations of pesticide/commodity(ies) for food and feed proposed by adoption by CCPR49, REP19/PR Para. 145, Appendix II, Step 5/8

Uganda notes that a number of compounds (Diquat (21), Imazalil (110), Oxamyl (126), Propamocarb (148), Propiconazole (160), Profenofos (171) Bentazone (172), Abamectin (177), Fenpyroximate (183), Kresoxim-Methyl (194), Pyroproxyfen (200) Cyprodinil (207), Pyraclostrobin (210), Fludioxonil (211), Mandipropamid (231), Spinetoram (233) Floupyram (243), Sulfoxaflor (252), Chlorfenapyr (254), Fluxapyroxad (256), Benzovindiflupyr (261) Cyantraniliprole (263), Cyazofamid (281), Lufenuron (286), Isofetamid (290), Oxathioprolin (291) Ethiofoprole (304), Fenpoxamid (305), Norflurazon (308), Pydiflumetofen (309), Pyriafenone (310) Tioxaxafen (311)) were evaluated by JMPR. It is further noted that the estimation of the MRLs were generally based on residue data set obtained from trials conducted according to Good Agricultural Practices (GAP). Uganda supports the adoption of the Proposed draft MRLs at Step 5/8 considering that the dietary exposure levels of the compounds were below the respective Acceptable Daily Intake (ADI) or Acute Reference Dose (ARfD).

Revision of the Classification of Food and Feed (CX/M 4-1989): Miscellaneous commodities not meeting the criteria for crop grouping, REP19/PR Para. 156, Appendix VII, Step 5/8 and 8

Uganda appreciates the effort of CCPR with regard to revision of the classification of food and feed for miscellaneous commodities not meeting the criteria for crop grouping as this has been a standing agenda item. Uganda takes note of the progress made thus far and supports the adoption for Class A: Type Miscellaneous - Primary Food Commodities of Plant Origin as proposed by CCPR51. This will enable the setting of MRLs in this class not meeting the criteria related to similar potential for pesticide residues, morphology, production practices, edible portion, residue behavior and flexibility to set sub group MRLs.

CODEX COMMITTEE ON CONTAMINANTS IN FOODS**Proposed draft revised MLs for lead in selected commodities in the General Standard for Contaminants and Toxins in Food and Feed (CXS 193- 1995), REP19/CF Para. 44, Appendix II, Step 5/8**

Uganda appreciates the extensive work that has been undertaken by CCCF on MLs for lead in specific commodities with scientific support from JECFA. Uganda supports the recommendation of lowering the maximum levels for lead in wines considering that the data available in country for the products is below the proposed values.

Draft Code of practice for the reduction of 3- monochloropropane1,2-diol esters (3- MCPDEs) and glycidyl esters (GEs) in refined oils and food products made with refined oils, REP19/CF Para. 79, Appendix IV, Step 8

Uganda supports the adoption of the Code of Practice for 3-MCPDE and GEs in refined oils and food products made with refined oils considering that the document has been modified to incorporate all refined oils including fish oil. The code will go a long way in supporting the oil refineries with regard to reduction of 3-MCPDEs and GEs.

Agenda Item 5: ADOPTION OF CODEX TEXTS AT STEP 5**CODEX COMMITTEE ON SPICES AND CULINARY HERBS****Proposed draft standard for dried basil, REP19/SCH Para. 66(i), Appendix V, Step 5**

Uganda takes note of the ongoing developments in the CCSCH towards progressing the draft standard for dried basil. Uganda associates itself with the steps being taken in advancing this important work through the codex process. As a producer and exporter of basil, Uganda is keen on the outcomes of the process and it will enhance the trade of the product which meets international quality and safety standards. With that foregoing background, Uganda supports the adoption of the proposed draft standard for dried basil at Step 5.

Agenda Item 7: PROPOSALS FOR NEW WORK**CODEX COMMITTEE ON FOOD HYGIENE****New work on development of guidelines for the control of Shiga toxin-producing *Escherichia coli* (STEC) in beef, unpasteurized milk and cheese produced from unpasteurized milk, leafy greens, and sprouts, REP19/FH Para 76, Step 2/3**

Uganda welcomes the efforts being made by CCFH seeking to develop guidelines for the control of Shiga toxin producing *Escherichia coli* (STEC) in beef, unpasteurized milk and cheese produced from unpasteurized milk, leafy greens and sprouts. Given the priority commodities being considered and the public health burden posed by the bacteria, Uganda supports the new work and we are keen to actively follow and participate in the developments.

CODEX COMMITTEE ON FOOD LABELLING**Proposals for New Work on Internet Sales/e-Commerce : REP19/FL para 86 - 66**

Uganda takes note of the interest to start new work on the development of guidance document on internet sales by CCFL. This effort is timely and responds to the rapid development globally and e-commerce sector currently undergoing a major technological disruption including but not limited to the Internet of Things. Uganda supports the proposal which aims to develop text that will provide Governments, the food Industry and consumers with clear and transparent guidance on the labelling of foods sold through the internet sales/e-commerce. This effort buttresses ongoing efforts and has potential to contribute to ensuring food safety, protecting consumers from food fraudulent practices and promoting fair trade globally.

CODEX COMMITTEE ON PESTICIDE RESIDUES**Proposed new work to develop guidelines for compound of low public health concerns that could be exempted from the establishment of CXLs**

Uganda supports the development of guidelines for compounds of low public health concern considering that there are no available international guidelines for pesticides of low public health concerns and yet there is growing use of such products. These guidelines will assist countries in the development of national guidelines/regulations for similar compounds.

Establishment of Codex schedules and priority lists of pesticides for evaluation by JMPR REP/PR19 App. X para. 250, New work

Uganda supports the approval of the compounds to be evaluated for recommendation of MRLs by JMPR schedule of pesticides for evaluation by the JMPR considering that establishment of the Codex MRLs will facilitate trade in various crop commodities which are of significant economic importance.

CODEX COMMITTEE ON CONTAMINANTS IN FOODS**Establishment of ML for total aflatoxins in wheat maize, rice, flour and cereal based foods for young children, REP19/CF, APPVIII**

Scientific findings have demonstrated that Aflatoxins are among the most potent mutagenic and carcinogenic substances. This situation is worsened considering that most of the susceptible commodities are staple foods such as maize, wheat and rice. Establishment of MLs for Aflatoxins in the specified commodities and products will hence significantly contribute to the protection of public health while rendering fair practices in international food trade. It is against the foregoing background that Uganda supports the recommendation to approve the new work on the establishment of MLs for Aflatoxins in cereal and cereal based products.