

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 4, 5, 6, 7, 8, 10**

**CAC/42 CRD25**  
**Original Language Only**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

#### Forty-second Session

CICG, Geneva, Switzerland, 8 - 12 July 2019

*Comments of Liberia*

#### **1. Standard/Committee/Step Codex Committee on Food Hygiene (CCFH)**

##### **Adoption at Step 8**

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

Control Guidance REP19/FH Para. 38, Appendix II,

**Background/Issue** Main  
issues are:

The histamine control guidance developed by CCFH was adopted by CAC41.

At the 50th session, the committee was to identify an appropriate place for the control guidance in CXC 52-2003, and to consider whether the inclusion of the new guidance would require amendment of other sections of CXC 52-2003, which contain technical guidance on histamine. The Committee agreed with the proposed alignment by the EWG with minor editorial changes, and a change proposed by Norway in a salt fish step.

##### **Recommended Position for CAC42**

Liberia supports the placement of the proposed histamine control guidance in Code of Practice of Fish and Fishery Products(CXC 52-2003)

##### **Rationale (provide scientific justification for the position)**

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

##### **Adoption at Step 5**

Proposed Draft Code of Practice on Food Allergen Management for Food Business Operators, REP19/FH Para. 56, Appendix III,

**Background/Issue** Main  
issues are:

CCFH49 agreed to start new work on management of food allergens, with Australia, the United Kingdom (UK) and the United States as co-leads. At CCFH50, Australia introduced the revised proposal prepared by the co-chairs based on written comments received from EWG. The main issues addressed were:

- thresholds for allergens,
- allergen risk assessment methods
- the use of precautionary allergen labeling (e.g., "may contain").

##### **Recommended Position for CAC42**

Liberia supports;

- the use of precautionary level for allergen management
- request for scientific advice from FAO/WHO related to thresholds and risk assessment to support decisions for allergen management

##### **Rationale (provide scientific justification for the position)**

The use of precautionary allergen labeling is appropriate particularly when it is not considered as replacement for implementation of measures necessary to prevent or minimize the presence of undeclared allergens.

The proposed code establishes the principles of allergen identification and sources of risk rather than providing prescriptive guidance. This will allow flexibility in its implementation and practices.

### **Adoption at Step 2/3**

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,

### **Background/Issue**

According to FAO/WHO JEMRA report on STEC commissioned by CCFH47 (2015), STEC poses significant public health burden worldwide as well as the risk management challenges and trade.

During CCFH 50, United States and Panama co-chaired the PWG on CCFH Work Priorities and introduced the discussion paper and project document submitted by the United States, Chile and Uruguay on "Control of Shiga Toxin-Producing *Escherichia coli* (STEC) in Beef, Unpasteurized Milk and Cheese produced from Unpasteurized Milk, Leafy Greens, and Sprouts as new work. The Committee agreed to establish an EWG chaired by Chile and the United States to prepare draft guidelines for consideration at the next session

### **Recommended Position for CAC42**

Liberia supports new work on STEC and agrees that beef and leafy greens should be considered the first priority commodities due to public health burden and impact on global trade.

### **Rationale (provide scientific justification for the position)**

The STEC guidance document will complement already existing codex guidance (e.g control of salmonella in meat) to enable countries better manage microbiological contamination of food with STEC

### **Discontinuation of Work**

Postponement of the development of sampling plan for histamine in eleven commodity standards for fish and fishery products (CXC 52-2003)

### **Background/Issue**

United States and Japan as co-chairs of the EWG revised the draft sampling guidance based on comments received. The terms of reference were to develop sampling plans for different purposes that would be practical and feasible while ensuring food safety using a risk-based approach.

Two sampling plans for different purposes were presented, one for suspect lots (e.g., unknown origin, unreliable controls) and one for firms or countries using Good Manufacturing Practices (GMPs)/HACCP, which allowed the EU3 class plan

### **Recommended Position for CAC42**

Liberia supports the postponement of work on the development of sampling plan for histamine in fish until the revision of the General Guidelines on Sampling (GL50) is completed.

### **Rationale (provide scientific justification for the position)**

- The guidance on sampling plans for fish based on GMPs/HACCP was ambiguous and would lead to confusion
- The plan for suspect lot which specified 59 samples would be costly and too stringent. It could be inferred based on the number of samples that histamine was a serious hazard when indeed histamine was a moderate hazard that rarely caused illness or death.

## **2. Standard/Committee/Step Codex Committee on Food Labelling (CCFL)**

### **Adoption at Step 5**

Proposed draft guidance for the labeling of non-retail containers: REP19/FL para 31 -66,

### **Background/Issue**

These Guidelines apply to the labelling of non-retail containers of food, including the information provided in the accompanying physical documents or by other means, and the, presentation thereof (excluding food additives and processing aids) not intended to be offered directly to the consumer

**Recommended Position for CAC42**

Liberia supports adoption of the proposed draft guidance but recommends the amendment of the definition of “food business” to include “harvesting” the definition will read as follows:

“Food Business” means an entity or undertaking, carrying out one or more activity(ies) related to any stages of production, **harvesting** processing, packaging, storage and distribution (including trade) of food.

**Rationale (provide scientific justification for the position)**

The food value chain does not always start with farmed produce (production), but could start with raw materials that are harvested from the wild e.g. Baobab fruits and Shea nuts. A case which is common in Africa.

**Proposals for New Work on Internet Sales/e-Commerce: REP19/FL para 86 – 66****Background/Issue**

This work has been necessitated by the need to provide international guidance on labelling aspects of e-commerce/internet sales due to the fact that globally, there is a growth and increasing diversification of e-commerce/internet sales. However, there is no international guidance.

**Recommended Position for CAC42**

Liberia supports approval for new work on guidance for Internet Sales/e-Commerce.

**Rationale (provide scientific justification for the position)**

The proposal aims to develop a text that will provide Governments, the food Industry and consumers with clear and transparent guidance on the labeling of foods sold through the internet sales/e-commerce. This will contribute to ensuring food safety, protecting consumers from food fraudulent practices and promoting fair trade globally.

**Proposal for New Work:**

Revision to the General Standard for the Labelling of Prepackaged Foods: allergen labelling and guidance on precautionary allergen or advisory labelling, REP19/FL para 91 – 97

**Background/Issue**

CCFL45 supported the new work due to the fact that among others, currently there is a need: -

- i) to clarify the listed food and ingredients known to cause hypersensitivity and update the current list to include new food and ingredients that have been found to cause hypersensitivity as well.
- ii) to provide more technical specifications for the food industry on how allergens should be presented on food labels to ensure consumer protection. Noting that the current allergen labelling provisions in the standard are considered to lack useful clarity and details for Industry.
- iii) to look into and review allergen labeling information guidance, aiming at making it clearer and more understood by consumers. Noting that currently there is an increase in the use of precautionary or advisory labelling and “free from” claims that lead allergen labelling not always clear and not understood by the consumer.

**Recommended Position for CAC42**

Liberia supports approval of the Project document on allergen labelling and guidance on precautionary allergen advisory labelling

**Rationale (provide scientific justification for the position)**

The proposal aims to review and clarify the provisions relevant to allergen labelling in GSFLPF and provide consistent allergen information for consumers. Noting that it will help to ensure food safety, protect a consumer from consuming food/ingredients of which they might be allergic to; and promote fair trade.

**3. Standard/Committee/Step Codex Committee on Food Import and Export Inspection and Certification Systems****Adoption at Step 5**

Draft Principles and guidelines for the assessment and use of voluntary Third-Party Assurance (vTPA) programmes, REP19/FICS Para. 53, Appendix III,

**Background/Issue**

The proposed guidelines are intended to assist competent authorities in the effective assessment and transparent use of reliable voluntary third-party assurance, information/data in support of their NFCS objectives.

Its focus is the structure, governance and components of Voluntary Third-Party Assurance (vTPA) programmes that align and support NFCS objectives relating to protecting consumer health and ensuring fair practices in food trade

### **Recommended Position for CAC42**

Liberia does not support the adoption at step 5, of the draft principles and guidelines for the assessment and use of voluntary Third-Party Assurance (vTPA) programmes, REP19/FICS Para. 53, Appendix III.

### **Rationale (provide scientific justification for the position)**

Africa reiterates her concerns which have been expressed severally in different fora including the Codex Alimentarius Commission that Third Party Assurance programmes, are private standards and do not take into account the unique circumstances of producers in developing countries. We are concerned about their risk to the creation of a dual certification systems at the national level. Besides questions still remain about the legitimacy of these vTPA programme, as they are not developed in a broad-based inclusive manner and their affordability for small and medium-sized food businesses.

It is worth noting that most developing countries are still at the stage of basic food control schemes under pre-requisites requirements for food safety and product certification as per ISO Standards as enshrined in our various national food laws. This regime which has worked well for many countries. We do not think integrating vTPA programmes into governmental food control schemes is the way to go. This will be an unnecessary layer of control that will affect our producers and potentially could lead to trade barriers.

We are aware that the STDF recently initiated projects in some developing countries to test and assess how voluntary Third-Party Assurance (TPA) programmes may be used in practice by government authorities in developing countries to improve food safety outcomes. We understand that the outcome of this project will further inform the current ongoing work on Principles and guidelines for the assessment and use of voluntary Third-Party Assurance (vTPA) programmes. This further supports the evidence in most developing countries, that Third Party Assurance programmes (private standards) are not the basis for food control in most developing countries. Africa wishes to remind that the Codex Alimentarius Commission is an intergovernmental standard setting body. Developing Codex guidelines to assess the performance of voluntary third-party assurance programmes developed by some private entities does not fall in the mandate of the CAC.

### **Adoption at Step 2/3**

Project document for new work on the consolidation of Codex Guidelines related to equivalence, REP19/FICS Para 32 (ii) and (iii) (b), Appendix II

### **Background/Issue**

The proposed draft guidance on the use of systems equivalence includes a significant number of concepts that overlap or duplicate existing Codex Guidelines, especially the Guidelines on the Judgment of Equivalence of Sanitary Measures Associated with Food Inspection and Certification Systems (CAC/GL 53-2003) and the Guidelines for the Development of Equivalence Agreements Regarding Food Imports and Export Inspection and Certification Systems (CAC/GL 34-1999).

### **Recommended Position for CAC42**

Liberia supports consolidation of all guidelines related to equivalence.

### **Rationale (provide scientific justification for the position)**

The consolidation is necessary remove overlapping documents on equivalence. This could potentially prevent confusion especially where countries have to consult several documents in the process of equivalence determination.

## **4. Standard/Committee/Step Codex Committee on Nutrition and Foods for Special Dietary Uses**

### **Adoption at Step 8**

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

**Background/Issue** eWG chaired by India, presented it report. The Committee considered the proposed draft standard section by section, aligned its provisions with the draft CCSCH layout template and relevant sections of existing CCSCH Standards, made editorial corrections and took the following decisions:

- Section 2 - Product definition:
- Section 3 – Composition:
- Other sections: to align provisions on food additives, contaminants, hygiene, weights and measures, labelling and methods of analysis and sampling in accordance with the decisions taken with regard to the draft standard for dried or dehydrated ginger (see Appendix III), and in addition: deleted the hygienic requirements for packaging to avoid duplication with existing Codex texts; and inserted methods for “insect fragments” and “mold damage” under Section 9.
- Annex I: The Committee discussed and agreed on all values and deleted a superfluous footnote.
- Annex II: The Committee discussed and agreed on parameters, inserting “Excreta, mammalian”, and agreed on all values.

The Committee, noting that all outstanding issues had been resolved, agreed to forward the proposed draft standard for dried or dehydrated garlic to CAC42 for adoption at Step 5/8

#### **Recommended Position for CAC42**

Liberia supports adoption of the proposed draft standard for dried or dehydrated garlic

#### **Rationale (provide scientific justification for the position)**

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.

#### **Adoption at Step 5**

Proposed draft standard for dried oregano, REP19/SCH Para. 30(i), Appendix II

#### **Background/Issue**

Turkey chaired the EWG for the development of the proposed draft standard. The Committee noted that consensus had been reached on all provisions except those parameters in square brackets, which required further consideration by the Committee.

Recalling that the item had been under consideration since the Committee's first session, the Chairperson urged the Committee to take an expeditious approach with a view to advancing the work.

The Committee considered the proposed draft standard section by section; made editorial corrections and further amendments for alignment with the draft CCSCS layout template and existing CCSCS Standards.

The committee also agreed to forward the provisions on food additives, labelling and methods of analysis and sampling to the appropriate committees for endorsement. The Committee agreed to forward the proposed draft Standard for dried Oregano to CAC42 for adoption at Step 5 (Appendix II) and extension of the timeline for completion until CCSCS5

#### **Recommended Position for CAC42**

Liberia supports the adoption of the proposed draft standard for dried oregano

#### **Rationale (provide scientific justification for the position)**

Establishing international standard for dried oregano will contribute to safe trade in this product

#### **Adoption Step 5**

Proposed draft standard for dried roots, rhizomes and bulbs — dried or dehydrated ginger,

REP19/SCH Para. 39(i), Appendix III

#### **Background/Issue**

This work was led by Nigeria which underscored that the draft text had been prepared using the standard CCSCS group template, and highlighted the pending issues to be discussed. The Committee considered the proposed draft standard section by section, making editorial corrections and the amendments on.

- Section 2 Product definition
- Section 8 Labelling,
- Section 9.1 Methods of analysis
- Annex I, Annex II

The Committee agreed to forward the proposed draft standard for dried roots, rhizomes and bulbs — dried or dehydrated ginger to CAC42 for adoption at Step 5

### **Recommended Position for CAC42**

Liberia supports adoption of the proposed draft standard for dried or dehydrated ginger

#### **Rationale (provide scientific justification for the position)**

Dried roots, rhizomes and bulbs – dried or dehydrated ginger are important agricultural commodities world-wide and especially in Africa (Nigeria, Kenya, Uganda, Togo, Senegal, Ghana, Cameroon etc). Having international standard for this product will contribute to and facilitate safe trade.

#### **Adoption at Step 5**

Proposed draft standard for dried basil, REP19/SCH Para. 66(i), Appendix V,

#### **Background/Issue**

This work was chaired by Egypt. The Committee agreed to consider the draft standard section by section, made editorial corrections and amendments for clarity and consistency, and agreed on the provisions for:

- Product definitions
- Styles
- Quality factors
- Odour, flavour and colour
- Classification of defectives and lot acceptance
- Other sections
- Annex I – Chemical properties for dried basil
- Annex II – Physical properties of basil

The committee also agreed to forward the provisions on food additives, labelling and methods of analysis to the relevant committees for endorsement; and agreed forward the proposed draft standard for dried basil to CAC42 for adoption at Step 5.

### **Recommended Position for CAC42**

Liberia supports adoption of the proposed draft standard for dried basil

#### **Rationale (provide scientific justification for the position)**

Dried basil is an important spice that is traded widely with significant economic importance to Africa (Egypt) in particular. Having international standard for this commodity will contribute to and facilitate safe trade.

#### **Adoption at Step 5**

Proposed draft standard for dried floral parts – dried cloves, REP19/SCH Para. 88(i), Appendix VI

#### **Background/Issue**

Nigeria as EWG Chair introduced the item, outlined the process followed by the EWG to develop the standards and noted that the draft had been prepared in accordance with the draft CCSC layout template for group standards. The Committee considered the draft standard section by section, made editorial corrections and amendments for clarity and consistency, and agreed on the following sections:

- Scope
- Styles
- Essential composition and quality factors
- Other sections
- Annex I – Chemical characteristics for dried floral parts (Cloves)
- Annex II – Physical characteristics for dried floral parts (Cloves)

The committee also agreed to forward the provisions on food additives, labelling and methods of analysis to the relevant committees for endorsement; and recommended the adoption of the proposed draft standard for cloves to CAC42 for adoption at Step 5. The Committee agreed to

forward the proposed draft standard for dried floral parts – dried cloves to CAC42 for adoption at Step 5 (Appendix VI)

#### **Recommended Position for CAC42**

Liberia supports adoption of the proposed draft standard for dried cloves

#### **Rationale (provide scientific justification for the position)**

Dried cloves are an important spice that is traded widely with significant economic importance to Africa in particular. Having international standard for this commodity will contribute to and facilitate safe trade.

#### **Adoption at Step 5**

#### **Proposed draft standard for saffron**

#### **REP19/SCH Para. 95(i), Appendix VII**

#### **Background/Issue**

This work was chaired by the Islamic Republic of Iran. The Committee considered the proposed draft standard and made amendments for consistency and alignment with other CCSCCH texts (Appendices II, III, IV, V, VI), and took the following additional actions:

- deleted the provisions under Section 3.2 “Quality factors” regarding infestation and adulteration and aligning Sections 3.2.1 “Odour, flavour and colour” and 3.2.3 “Chemical and physical characteristics” for linguistic consistency;
- agreed that “No food additives are permitted for use in products covered by this standard”;
- deleted the hygienic requirements for packaging to avoid duplication with existing Codex texts; and iv. deleted the draft sampling plans pending the provision of the relevant template by CCMAS.

The Committee recommended to forward the proposed draft standard for saffron to CAC42 for adoption at Step 5 (Appendix VII)

#### **Recommended Position for CAC42**

Liberia supports adoption of the proposed draft standard for dried cloves

#### **Rationale (provide scientific justification for the position)**

Saffron is an important spice that is traded widely with significant economic importance. Establishing international standard for this commodity will contribute to and facilitate safe trade.

### **5. Standard/Committee/Step Codex Committee on Food Additive**

#### **Adoption at Step 5/8**

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

#### **Background/Issue**

CCFA 51 agreed to forward the following full specifications for food additives to CAC42 for adoption at Step 5/8 following JECFA evaluations.

- a) 5 food additives specifications designated as full (FAO JECFA Monographs 22, Rome, 2019)
- b) 24 new specifications for flavouring agents (FAO JECFA Monographs 22, Rome, 2018)
- c) 3 Flavouring agents considered for revision of specifications only

consequential amendment to the list of codex specifications of food additives (CXM 6-2018) removal of Red 2 G and to change the name for INS 160a(iv) from “Carotenes, beta-, algae” to “β-carotene-rich extract from *Dunaliella salina*”

#### **Recommended Position for CAC42**

Liberia supports the recommendations.

**Rationale (provide scientific justification for the position)**

Scientific evaluations conducted by JECFA indicated no adverse health effect of the additives

**Adoption at Step 8 and 5/8**

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

**Background/Issue****CCFA51 recommended adoption of the following food additive provisions at steps 8 and 5/8 by CAC 42**

Proposed draft provisions for tamarind seed polysaccharide (INS 437) and gum ghatti (INS 419) in Table 3 for adoption at Step 5/8)

Draft and proposed draft provisions for colours in the Step process in food categories 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (nonfruit) and sweet sauces

Provision for trisodium citrate in FC 01.1.1 Fluid Milk (plain) -For adoption at Step 8

Proposed draft provisions related to FC 01.1.2 (Other fluid milks (plain)) with the technological function of emulsifier and stabilizer (For adoption at Step 5/8)

e) Provisions in Table 1 and 2 of the GSFA in food categories 14.1.4 and 14.1.5 (For adoption at Step 8)

f) Food Category No. 14.1.4 Water-based flavoured drinks, including "sport," "energy," or "electrolyte" drinks and particulate drinks

g) Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0, with the exception of those additives with technological functions of colour (excluding those provisions discussed in point (i)) or sweetener, adipates, nitrites and nitrates, the provisions in food category 14.2.3 and its subcategories, and provisions awaiting a reply from CCSC, CCPFV or CCFO2 (For adoption at Step 5/8 and 8)

**Recommended Position for CAC42**

Liberia supports adoption at step 5/8

Liberia Union support adoption

Liberia does not support the use of trisodium citrate in fluid milk (plain)

Liberia does not support inclusion of the additives listed in FC 01.1.2 (Other fluid milks (plain)).

Liberia supports adoption of provisions in Table 1 and 2 of the food categories

**Rationale (provide scientific justification for the position)**

The respective commodity standards contained a reference to Table 3 of the GSFA on either a general basis or for specific functional classes hence the two can be classified as ADI not specified.

The adoption of this provision at GMP does not constitute a guarantee for prevention of the entry of these categories of products in a country where there is no capacity for verification

Addition of additives in these food categories could mislead the consumer as the additives can also have the thickener properties

Available data indicate no safety concerns

**Adoption at Step 5/8**

Revision of the Class Names and the International Numbering System for Food Additives (CXG 36-1989) (Proposed draft) REP19/FA Para. 149 (i), Appendix IX Part, ongoing work,

**Background/Issue**

At CCFA51 an in-session working group on INS made recommendations on: removal of four additives from the INS; changes to Functional Classes and Technological Purposes for Additives in the INS; assignment of an INS Number to  $\beta$ - carotene- rich extract from *Dunaliella salina* hence revision in section 3 and 4

- a) Deletion of INS names and numbers ie. 128 Red 2G and 1411 Distarch glycerol
- b) Changes to the functional classes and technological purposes for Methacrylate copolymer, basic INS No. 1205 from glazing agent to carrier or encapsulating agent.
- c) Change of name of carotenes algae to  $\beta$ -carotene- rich extract from Dunaliella salina INS 160a(iv)

#### **Recommended Position for CAC42**

Liberia supports the proposed draft revisions

#### **Rationale (provide scientific justification for the position)**

Red 2G does not have a JECFA ADI and as such, all provisions for Red 2G in the step process in GSFA would be discontinued

**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, REP19/FA Para. 57 (ii)a, Appendix VI Part B1-B3, New work**

#### **Background/Issue**

An EWG, chaired by Australia and co-chaired by the United States of America and Japan, and working in English only, to consider:

a. the alignment of the following commodity standards listed in the forward workplan: with the assistance of IDF, the following milk and milk commodity standards including finishing the cheese standards: CXS 208-1999, CXS 221-2001, CXS 250-2006, CXS 251-2006, CXS 2522006, CXS 273-1968, CXS 275-1973, CXS 278-1978 and CXS 283-1978; plus additional commodity standards CXS 19-1981, CXS 33-1981, CXS 210-1999, CXS 2111999, CXS 256-

2007, CXS 326-2017, CXS 327-2017, CXS 328-2017 and CXS 329-2017;

b. Consider how future divergence of the GSFA and the commodity standards can be avoided as the commodity committees amend or develop new food-additive provisions; and

c. Revise the food additive section of the commodity standards as indicated CRD2 Annex 1 Part A to include tamarind seed polysaccharide (INS 437) under the appropriate functional class header with a maximum use level (ML) of Good Manufacturing Practice (GMP)

(ii) request CCNFSDU consider the appropriate food-additive provisions and maximum levels for commodity standards CXS 181-1991 (Standard for Formula Foods for Use in Weight Control Diets) and CXS 203-1995 (Standard for Formula Foods for Use in very Low Energy Diets for Weight Reduction).

#### **Recommended Position for CAC42**

Liberia supports approval of this new work

#### **Rationale (provide scientific justification for the position)**

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), REP19/FA Para. 57 (ii)b,**

#### **Appendix VI Part B4**

#### **Background/Issue**

CCFA51 considered recommendations of the physical working group convened by CCFA50 on alignment of food additive provisions in the standard 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).

#### **Recommended Position for CAC42**

Liberia supports the adoption of the revisions on alignment of food additive provisions.

#### **Rationale (provide scientific justification for the position)**

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.

### **Revised food-additive provisions of the GSFA in relation to the replacement notes to Note 161, REP19/FA Para. 119 (i), Appendix VI Part C**

#### **Background/Issue**

CCFA50 established an eWG to develop wording for an alternative to note 161 (Subject to national legislation of the importing country aimed, in particular, at consistency with Section 3.2 of the Preamble) relating to the use of sweeteners.

Two alternative notes (Note A and Note B) were agreed upon at CCFA51.

**A. Note for provisions for additives with the function of sweetener but not the function of flavour enhancer:** “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.”

**B. Note for provisions for additives with both sweetener and flavour enhancer functions:** “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. This limitation may not apply to the appropriate use as a flavour enhancer.”

It was also agreed 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 (i.e. sweetener function only or sweetener and flavour enhancer functions).

Consequently, adopted provisions with Note 161 attached to them are presented in the format of Table 2 of the GSFA in Appendix VI part C of REP 19/FA and differentiates which alternative Note for Note 161 is proposed for each adopted provision. CAC 42 is requested to adopt these provisions ie from Food Category No. 01.1.4 (Flavoured fluid milk drinks) through to Food Category No. 14.1.5 (Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages, excluding cocoa)

#### **Recommended Position for CAC42**

Liberia 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 (provide scientific justification for the position)**

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 that 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 thirteen standards for milk and milk products (ripened cheese)**

**Background/Issue**

Following the on-going alignment of the food additive provisions in the GSFA, there was need to amend the food additive sections of the following thirteen standards for milk and milk products (ripened cheese) i.e. Standards for Cheddar (CXS 263- 1966); Danbo (CXS 264-1966); Edam (CXS 265- 1966); Gouda (CXS 266-1966); Havarti (CXS 267- 1966); Samsø (CXS 268-1966);

Emmental (CXS 269-1967); Tilsiter (CXS 270- 1968); Saint-Paulin (CXS 271-1968); Provolone (CXS 272-1968); Coulommiers (CXS 274-1969); Camembert (CXS 276-1973); and Brie (CXS 277-1973), REP19/FA Para. 57 (i)a, Appendix V Part A, ongoing work

**Recommended Position for CAC42**

Liberia supports the adoption of the amendments.

**Rationale (provide scientific justification for the position)**

There is need to amend the old food additive sections of the respective standards, once alignment of the provisions in the GSFA has been completed

**Revised food-additive sections of the three standards for cereals, pulses and legumes and three standards for vegetable proteins, REP19/FA Para. 57 (i)c, Appendix V Part C, ongoing work****Background/Issue**

Following the on-going alignment of the food additive provisions in the GSFA, there was need to amend the food additive sections of the following 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) as listed in Appendix V, part C of REP19/FA. CAC 42 is requested to adopt the revised sections of the respective standards.

**Recommended Position for CAC42**

Liberia supports the adoption of the amendments of the food additives sections of the listed standards.

**Rationale (provide scientific justification for the position)**

There is 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

**Discontinuation of Work****General Standard for Food Additives CXS 152-1985 REP 19/FA Paragraph 137(iii) and Appendix VIII****Background/Issue**

The PWG prior to CCFA51 recommended discontinuation of the following provisions

- a) Draft and proposed draft provisions for colours in the Step process in food categories 05.2 (Confectionery including hard and soft candy, nougats, etc. other than food categories 05.1, 05.3 and 05.4), 05.3 (Chewing gum), 05.4 (Decorations (e.g. for fine bakery wares), toppings (non-fruit) and sweet sauce
- b) Provisions in Table 1 and 2 of the GSFA in food categories 14.1.4 and 14.1.5
- c) Draft and proposed draft provisions in Table 1 and 2 of the GSFA in food categories 01.0 through 16.0, with the exception of those additives with technological functions of colour (excluding those provisions discussed in point (i)) or sweetener, adipates, nitrites and nitrates, the provisions in food category 14.2.3 and its subcategories, and provisions awaiting a reply from CCSC, CCPFV or CCFO
- d) Provisions of Red 2G in Step Process

**Recommended Position for CAC42**

Liberia supports the discontinuation of work

**Rationale (provide scientific justification for the position)** CCFA51 could not reach consensus on adoption of these provisions.

No exposure assessment data provided.

No exposure assessment data provided.

## **6. Standard/Committee/Step 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, ongoing work. The compounds include Diquat (21), Imazalil (110), Oxamyl (126), Propamocarb (148), Propioconazole (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), Oxathipiprolin (291)

Ethioprole (304), Fenpioxamid (305), Norflurazon (308), Pydiflumetofen (309), Pyriafenone (310)

Tioxaxafen (311)

### **Background/Issue**

The following compounds have been evaluated by JMPR and the CCPR is recommending their adoption during CAC42.

### **Recommended Position for CAC42**

Liberia supports the adoption of Proposed draft MRLs at Step 5/8 REP19/PR Para. 145, Appendix II

### **Rationale (provide scientific justification for the position)**

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) ]

### **Adoption at Step at Step 5/8 and 8**

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, Class A: Type Miscellaneous Primary Food Commodities of Plant Origin

### **Background/Issue**

The revision of the classification of food and feed has been a standing agenda item of CCPR. CCPR51 is recommending for adoption by CAC42 the new classes for Miscellaneous Commodities not meeting the criteria for crop grouping, proposed groupings (including any possible impact of the types on CXLs)

### **Recommended Position for CAC42**

Liberia 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 (provide scientific justification for the position)**

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 behavior
- Flexibility to set subgroup MRLs

## **CXLs for Pesticides Recommended for Revocation for approval by CAC 42**

### **Azinophos-Methyl (2)**

### **Background/Issue**

Azinophos-Methyl is an unsupported compound due to public health concerns. CCPR51 is proposing to CAC42 the deletion of existing CXLs except for spices

**Recommended Position for CAC42**

Liberia supports the deletion of the existing CXLs for this compound

**Rationale (provide scientific justification for the position)**

Public health concerns have been registered for this compound and is unsupported by the sponsor **Diquat (31)**

**Background/Issue**

Diquat has been evaluated under new use and other evaluation. The CCPR51 is proposing to CAC42 the revoking of the CXLs of the following commodities: Beans, dry, Peas (dry) and Soya bean (dry).

**Recommended Position for CAC42**

Liberia supports the deletion of the existing CXLs for this compound

**Rationale (provide scientific justification for the position)**

New subgroup MRLs are being proposed replacing the individual commodity MRLs

**Phosalone (60)****Background/Issue**

CCPR51 is proposing to CAC42 the deletion of existing CXLs except for spices

**Recommended Position for CAC42**

Liberia supports the deletion of the existing CXLs for this compound

**Rationale (provide scientific justification for the position)**

Public health concerns have been registered for this compound and is unsupported by the sponsor

**Imazalil (110), Oxamyl (126), Propamincarb (148), Propiconazole (160), Bentazone (172), Abamectin (177), Fenpyroximate (193), Kresoxim-Methyl (199), Pyraclostrobin (210), Fludioxonil (211), Mandipropamid (231), Spinetoram (233), Fluopyram (240), Sulfoxaflor (252), Fluxapyroxad (256), Benzovindiflupyr (261), Cyantraniliprole (263), Lufenuron (286), Oxathiapiprolin (291)**

**Background/Issue**

The compounds have been evaluated under new use and other evaluation, hence CCPR51 is recommending to CAC42 the deletion of existing CXLs

**Recommended Position for CAC42**

Liberia supports the deletion of the existing CXLs for these compounds

**Rationale (provide scientific justification for the position)**

Proposed new work to develop guidelines for compound of low public health concerns that could be exempted from the establishment of CXLs

**Background/Issue**

During CCPR50 members states noted that there was increasing application of compounds of low public health concerns and that there were no international guidelines on how to use these compounds. The CCPR51 is therefore proposing this new work for approval by CAC42.

**Recommended Position for CAC42**

Liberia supports the development of guidelines for compound of low public health concerns

**Rationale (provide scientific justification for the position)**

Currently there are no 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 on compound of low public health concerns.

The proposal is also in line with the Codex Strategic plan.

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

**New compound evaluation:**

Pyridate, Pyrasulfutole, Teraniliprole  
Pyraziflumid, Flulianil, BAS 759 F Mefentrifluconazole

**Background/Issue**

The compounds have been registered, both toxicological and residue data have been provided by the sponsor. They are therefore being recommended for approval by CAC42

**Recommended Position for CAC42**

Liberia supports the approval by CAC42 of the compounds to be evaluated for recommendation of MRLs by JMPR

**Rationale (provide scientific justification for the position)**

The evaluation of toxicological and residue data package for will result in the recommendation of MRLs. Establishment of Codex MRLs will facilitate trade in various crop commodities which are of economic importance to Africa.

**New compounds on reserve list.**

Ethiaflurali, Inpyrfluxam, BCS-C555621, Spiropidion, isoflucypram,

**Background/Issue**

The compounds have been registered, however both toxicological and residue data submissions are still ongoing.

**Recommended Position for CAC42**

Liberia supports the approval by CAC42 of the compounds on the reserve list for the new compounds.

**Rationale (provide scientific justification for the position)**

The data package and the other requirements are incomplete. Submission of the data package is contemplated to enable the establishment of MRLs.

**New uses and other use**

Trinexpac, Isoxalutole, Teboconazole  
Trifloxystrobin, Prothioconazole, Bixafen, Isoprothioline, Pyraclostrobin, Thiamethoxam, Chlorothionil,  
Quinchlorac, Difenoconazole, Fenbuconazole, Indoxacarb, Flutriafol,  
Fenpyroximate, Chloropyrifos, Imodchlorprid, Spiromesfen, Profenofos

**Background/Issue**

The compounds have been registered for follow-up evaluation by JMPR. Toxicological, new residue data or new label information are being recommended for approval by CAC42.

**Recommended Position for CAC42**

Liberia supports the approval of the MRLs of the compounds for new uses and other uses

**Rationale (provide scientific justification for the position)**

Establishment of new Codex MRLs will facilitate trade in various crop commodities which are of economic importance to Africa.

**Periodic review**

Aldicarb (117), Metalaxyl-M (212),  
Metalaxyl (138), Diazinon (22), Fipronil (202), Prochloraz (142), Methidathion (51), Qinozozene  
(64), Ethoxiquin (36)

**Background/Issue**

The compounds are being reviewed under the 15year rule for new toxicological and residue data package. The CCPR51 is proposing to CAC42 for approval of this compound to be evaluated under the periodic review.

**Recommended Position for CAC42**

Liberia supports the approval by CAC42 of the compounds recommended for periodic review.

**Rationale (provide scientific justification for the position)**

Public health concerns have been sighted by countries due to exceedance of both acute and longterm reference doses.

**7. Standard/Committee/Step Codex Committee on Methods of Sampling and Analysis****Preamble and document structure for the General Standard on Methods of Analysis and Sampling, REP/MAS 19 para 61, Appendix III****Background/Issue**

The General standard is being revised to include a preamble to state that “all Codex methods can be used for any purpose (including trade disputes when relevant parties agree)”.

The revised structure of CXS 234 also lists all methods of analysis and uses hyperlinks to display those Codex methods (CX/RM) that should be described in the CXS 234 and method performance criteria (MPC) associated with a provision in a Codex standard. A searchable database on methods of analysis and sampling will also be developed by the Codex Secretariat and be made available on the Codex website.

**Recommended Position for CAC42**

Liberia supports the newly introduced preamble and the revised structure of the General Standard on Methods of Analysis and Sampling

**Rationale (provide scientific justification for the position)**

The introduction of preamble is necessary to clarify the role of Codex methods in trade. The revised structure will improve the clarity and accuracy of the text.

**Adoption at Step 5**

Guidelines on Measurement Uncertainty, RE/MAS19 para 66, Appendix IV

**Background/Issue**

Analytical measurement results in food control are used to assess whether food products meet relevant specifications. However, the accuracy of measurement results are affected by various error components, and it is important to ensure these errors are properly considered. The guideline covers general aspects of measurement uncertainty for quantitative analysis, provides definitions of measurement uncertainty and related terminology and clarifies the role of measurement uncertainty in the interpretation of test results and the relationship between measurement uncertainty and sampling plans.

**Recommended Position for CAC42**

Liberia supports the adoption of the guidelines on measurement uncertainty at Step 5

**Rationale (provide scientific justification for the position)**

The guidance provided in the document will facilitate estimation of measurement uncertainty which is a critical element in the establishment of metrological traceability of the measurement results. This will assist countries to make a more scientifically-based judgement on the acceptance or rejection of food products in accordance with applicable specifications

**8. Standard/Committee/Step Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)****Review of the Standard for Follow-up Formula:****Proposed draft Scope, Description and Labelling for follow-up formula for older infants. REP19/NFSDU, 57 and App.III****Background/Issue**

The discussions on the standard for follow-up formula has mainly focused on:

- Section A: follow-up formula for older infants: scope, product definition and labelling.
- Section B [Product] for young children: scope, product definition and labelling.
- Options for the structure of the Standard and the preamble

The review process involves a sequential order of first discussing and agreeing on the scope of the Standard before discussion on the structure and the preamble. At

CCNFSDU40 agreed section A with regards to the scope, product definition and referred the section on labelling to CCFL for endorsement. CCNFSDU40 however, have not been able to reach consensus on section B due to divergent opinion on product definition.

CCNFSDU40 is recommending that Section A be adopted at step 5

#### **Recommended Position for CAC42**

Liberia supports adoption of Section A: follow-up formula for older infants: scope, product definition and labelling.

#### **Rationale (provide scientific justification for the position)**

The provisions are necessary to enable countries better regulate follow-up formula for older infants

#### **Revocation of Codex text REP19/NFSDU para 10**

##### **Background/Issue**

In response to the recommendation from CCFA50, the Committee agreed to revoke the provisions for monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)) and dipotassium tartrate (INS 336(ii)) in the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) due to the lack of JECFA specifications.

#### **Recommended Position for CAC42**

African Union supports the decision of the Committee on the revocation of the provision for these additives.

#### **Rationale (provide scientific justification for the position)**

There is lack of JECFA specifications

#### **Discontinuation of work on NRV-NCD for EPA and DHA long chain omega-3 fatty acids – par 94**

##### **Background/Issue**

The Committee decided to discontinue the work on NRV-NCD for EPA and DHA long chain omega-3 fatty acids

#### **Recommended Position for CAC42**

Liberia supports the decision of the CCNFSDU to discontinue work on NRV-NCD for EPA and DHA long chain omega-3 fatty acids.

#### **Rationale (provide scientific justification for the position)**

CCNFSDU noted that it was premature to set NRV-NCD for EPA and DHA at this point in light of the fact that the overall conclusion of the NUGAG analysis did not change even after including the data from three recently conducted trials. The work could be reconsidered when new body of evidence become available in the future.

### **9. Standard/Committee/Step Codex Committee on Contaminants in Foods**

#### **Adoption at Step 5/8**

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 **Background/Issue**

In 2010 JECFA73 withdrew the PTWI for lead of 25 µg/kg bw and could not establish a new PTWI that would be considered health protective. Exposure to lead is associated with various neurodevelopmental effects making fetuses, infants and children most sensitive to lead poisoning In order to protect the vulnerable groups, it was agreed at the 6th session of CCCF in 2012 that the maximum levels (MLs) for lead in various foods in the General Standard for Contaminants and Toxins in Food and Feed (GSCTFF) be revised. Since then lead in foods, including fruit juices, milk and milk products, infant formula, canned fruits and vegetables, fruits, and cereal grains (except buckwheat, cañihua and quinoa) have already been revised

- Lower ML from 0.2 mg/kg to 0.1 mg/kg for wines • Establish a ML of 0.15 mg/kg for fortified / liqueur wines
- Cattle: From 0.5 mg/kg to 0.2 mg/kg.
- Pig: From 0.5 mg/kg to 0.15 mg/kg.
- Poultry: From 0.5 mg/kg to 0.1 mg/kg

#### **Recommended Position for CAC42**

Liberia 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 (provide scientific justification for the position)** The approved MLs for wines are achievable.

South Africa is the biggest producer and exporter of wine in Africa and results of analysis of lead in 39 non fortified wine samples of vintage (2000-2013) had lead concentrations between the range of 0.008mg/l and 0.033 mg/l which are below the 0.05 mg/l recommended by the EWG. Similarly, data generated by the Uganda on Lead between 2017 and 2019 showed that all 50 samples of both imported and locally produced wines (Red wines -12, Still table wines -33, Fortified wines -4 and Sparkling wine -1) had levels below 0.05mg/l. The MLs for edible offal were proposed without data from Africa 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.

#### **Adoption at Step 5/8**

Proposed draft ML for cadmium for chocolates containing or declaring, REP19/CF Para. 56, Appendix III

#### **Background/Issue**

Cadmium can accumulate in kidneys leading to irreversible renal tubular dysfunction. High cadmium intake is also associated with the formation of kidney stones as well as problems with the skeletal and respiratory systems. Cadmium is abundant in nature and can be released to the environment in different ways including natural activities such as volcanic activities and through anthropogenic activities such as mining and smelting of ores containing zinc, burning of fossil fuels and emissions from discarded batteries. About 72% of the world supply of cocoa beans comes from West Africa, especially Cote d'Ivoire, Ghana, Nigeria and Cameroon. Other cocoaproducing countries include Ecuador, Brazil, Peru, Indonesia and Papua New Guinea. Cadmium levels in cocoa beans can vary considerably between regions with West Africa having the lowest concentration.

Exposure assessment by JECFA (77th Meeting in 2013) concluded that total cadmium exposure for high consumers of cocoa and cocoa products was not a health concern. CCCF 8 (2014) however decided that the lack of MLs could threaten the exports of some member countries thus the decision to set MLs for cadmium. CAC41 adopted the following MLs:

ML of 0.8mg/kg for chocolate containing or declaring  $\geq 50\%$  to  $<70\%$  total cocoa solids on a dry matter basis.

1.0mg/kg for chocolate containing or declaring  $\geq 70\%$  total cocoa solids on a dry matter basis.

#### **Recommended Position for CAC42**

Liberia 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 (provide scientific justification for the position)**

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  $\mu\text{g} / \text{kg bw}$  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.

#### **Adoption at Step 8**

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,

#### **Background/Issue**

Both 3-MCPDE and GE are produced during oil refining and have toxic effects on kidney and male reproductive organs, whereas their non-esterified forms are carcinogenic. They are formed during the heating process. Previously Codex established a COP (CAC/RCP 64-2008) which addresses mitigation measures for 3-MCPD (the non-esterified moiety) formation in acidhydrolyzed vegetable proteins.

**Recommended Position for CAC42**

Liberia supports the adoption of the Code of Practice for 3-MCPDE and GE

**Rationale (provide scientific justification for the position)**

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. REP19/CF,****Appendix V para. 87****Background/Issue**

The guidelines apply to unregulated contaminants for which no Codex or national standards exist and is aimed at providing risk assessors and risk managers with guidance on ensuring the safety, while minimizing disruption or wastage, of the food supply. They apply in situations where a rapid risk assessment is required and little or no toxicological data or a health-based guidance value is available. The guidelines rely on the Threshold of Toxicological Concern (TTC) approach with a derived "cut-off value", which is a contamination level below which no adverse health concern is generally recognized. The TTC is an exposure level below which mutagenic or carcinogenic compounds are expected to have no health concern.

This exposure is then used to calculate the "cut-off value" with assumptions on food intake of the affected commodity. The standard "cut-off value" of 1 µg/kg is thus obtained, but may need to be adjusted in cases where the affected commodity is consumed at a greater percentage of the diet than the value of 10% assumed in the standard calculation (for example, infant foods).

**Recommended Position for CAC42**

Liberia supports the adoption of the Guidelines

**Rationale (provide scientific justification for the position)**

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.

**Revocation of MLs for lead in wines and offals****Background/Issue**

New MLs for lead in wines and offals have been proposed hence the old levels are being revoked

**Recommended Position for CAC42**

Liberia supports the revocation of the MLs for lead in wines and offals as a result of the consequential establishment of new MLs for these commodities

**MLs for lead in in certain food categories (food for infant and young children, eggs, egg products), REP19/CF, APPVI****Background/Issue**

In 2010 JECFA73 withdrew the PTWI for lead of 25 µg/kg bw and could not establish a new PTWI that would be considered health protective. Exposure to lead is associated with various neurodevelopmental effects making fetuses, infants and children most sensitive to lead poisoning. In order to protect the vulnerable groups, it was agreed at the 6th session of CCCF in 2012 that the maximum levels (MLs) for lead in various foods in the General Standard for Contaminants and Toxins in Food and Feed (GSCTFF) be revised. Since then the MLs for several food categories have been revised. This new work is a continuation of the revision provision

**Recommended Position for CAC42**

Liberia supports approval for new work on MLs for lead

**Rationale (provide scientific justification for the position)**

This work will ensure public health protection by harmonizing the level of lead in food categories not included in the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995) (GSCTFF) and ensure fair practices in international food trade.

**Revision of the Code of Practice for the Prevention and reduction of lead contamination in Foods, REP19/CF, APPVII****Background/Issue**

This work is part of the effort to prevent and reduce lead in food.

**Recommended Position for CAC42**

Liberia recommends approval for new work to revise the Code of Practice for the Prevention and reduction of lead contamination in Foods

**Rationale (provide scientific justification for the position)**

Revision of the COP would complement ongoing work by CCCF on lead, including revision of maximum levels (MLs) for lead in selected commodities in the General Standard for Contaminants and Toxins in Food and Feed (GSCTFF) and a discussion paper on future work on MLs for lead for inclusion in the GSCTFF.

**Development of a code of practice for the reduction and prevention of cadmium contamination in cocoa beans, REP19/CF, APPVIII****Background/Issue**

This work is part of the effort to prevent and reduce lead in food.

**Recommended Position for CAC42**

Liberia recommends approval for new work to develop a code of practice for the reduction and prevention of cadmium contamination in cocoa beans

**Rationale (provide scientific justification for the position)**

Cocoa is a valuable commercial crop that contributes to the economies of several developing countries including Cote d'Ivoire, Ghana, Nigeria, Sierra Leone and Cameroon. Cadmium levels in cocoa has attracted attention lately and the CAC has already adopted MLs for cadmium in chocolates and cocoa-derived products.

The Code of Practice (COP) will provide guidance to Member States and the cocoa production industry on the prevention and reduction of cadmium contamination in cocoa beans during production and post-harvest processing: fermentation, drying and storing.

**Establishment of ML for total aflatoxins in wheat maize, rice, flour and cereal based foods for young children, REP19/CF, APPVIII****Background/Issue**

Toxicological data and human dietary exposure to aflatoxins (AFs) were evaluated by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) at its 49th and 83rd meetings. The findings showed that AFs are genotoxic human liver carcinogens, being among the most potent mutagenic and carcinogenic substances known so far.

**Recommended Position for CAC42**

Liberia recommends approval for new work on the establishment of MLs for total aflatoxins in wheat maize, rice, flour and cereal based foods for young children

**Rationale (provide scientific justification for the position)**

This work will contribute to protecting public health and fair practices in the international food trade by establishing MLs for aflatoxins in cereal and cereal-based products.