

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS



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Agenda Item 6

CX/FO 03/7-Add.2

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FATS AND OILS

Eighteenth Session

London, United Kingdom, 3 – 7 February 2003

### PROPOSED DRAFT LIST OF ACCEPTABLE PREVIOUS CARGOES

#### GOVERNMENT COMMENTS AT STEP 3

The following comments have been received from Brazil, Canada, France in response to CL 2001/4-FO and CL 2002/49.

#### BRAZIL

Brazil reiterates the comments already forwarded as an answer to the CL 2001/4-FO, annexed to Alinorm 01/17 and constants of the CX/FO 03/7, adding the following comment:

Brazil agrees with the Proposed Draft List of Banned Immediate Previous Cargoes ('negative list').

#### CANADA

Canada notes that the 23<sup>rd</sup> Session of the Codex Alimentarius Commission adopted the *Recommended International Code of Practice for the Storage and Transport of Edible Oils in Bulk*. The Commission also agreed that the *Code* would include two Appendices, one being a List of Acceptable Previous Cargoes and the other being a List of Banned Previous Cargoes.

The development of these Appendices as directed by the Commission may not be, in retrospect, the most efficient use of the CCFO's resources. The Committee would need to constantly review and revise the Appendices in order to ensure they remain current. Given the frequency of CCFO Sessions, this may not be practical. Furthermore, the existence of the two Appendices does not address the issue of how to deal with substances which are not on either list. This could lead to importing countries applying their own evaluation criteria which has the potential for creating unnecessary trade barriers.

Canada therefore recommends that the *Recommended International Code of Practice for the Storage and Transport of Edible Oils in Bulk* be revised by deleting the two Appendices.

It is Canada's opinion that it would be more appropriate for CCFO to develop applicable technical criteria which would provide guidance for the evaluation of previous cargoes. This criteria would facilitate consistent decision-making by competent authorities on the acceptability of previous cargoes and contribute to a more consistent level of consumer health protection while minimizing the creation of unnecessary trade barriers. Lists developed using CCFO criteria, if desired, could be maintained by recognized international bodies such as FOSFA and NIOP.

As we have indicated in previous comments, Canada is of the view that lists in and by themselves do not offer protection from contamination. Even substances which are "acceptable" previous cargoes can result in a health hazard to the consumer (e.g. substances known to be allergens) or can result in product degradation in the absence of effective cleaning. Lists of "acceptable" or "banned" previous cargoes are not substitutes for good cleaning practices

## FRANCE

France is proposing that the list of preceding cargoes authorised by the European Community should be fully adhered to. The following additional mentions should therefore be reproduced :

- Drinking water – acceptable only if the immediately preceding cargo is on this list (and not on “the list”)
- Solution of ammonium nitrate and urea – N° CAS : mixture of 57-13-6 (urea) and 6484-52-2 (ammonium nitrate)
- White mineral oils – provisionally accepted (N° CAS : 8042 – 47 – 5) which do not appear on the positive list of the EEC, must be removed.
- Dregs of wine (poor quality wines, argol, cream of tartar, potassium hydrogenotartrate, potassium bitartrate) N° CAS : 868-14-4.