



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Items 2, 3.1, 3.2, 3.3, 4, 6, 7.1, 7.2 and 10

CX/NE 19/10/CRD5

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
FAO/WHO COORDINATING COMMITTEE FOR THE NEAR EAST
Tenth Session**

FAO Headquarters, Rome, Italy, 11-15 November 2019

Comments of Egypt (Arab Republic of)

AGENDA ITEM 2

Keynote address and discussion: Chemicals in food - the invisible challenge, when do we need to be worried and what do we need to know?

Egypt supports the recommendations of this document and wishes to stress the following:

1. The importance of promoting and supporting the use of Codex codes of practice and standards in the countries of the region, particularly with respect to the reduction of the risk of chemicals in food.
2. The inclusion of the risks of chemicals, particularly those contaminating food through water or soil, for example, in the Codex Strategy of the region.
3. Collaboration among all sectors in order to raise awareness on the collection of data available for food contaminants and to assess consumer patterns.
4. Cooperation with initiatives launched by international organizations such as FAO and WHO on the reduction and prevention of food contamination by chemicals.

AGENDA ITEM 3.1

Food safety and quality situation in the countries of the region: current and emerging issues in the region

Egypt thanks the efforts made by the Codex Alimentarius through the questionnaire sent to identify current and emergency issues of importance to food safety, and is of the view that:

1. The results of the questionnaire should be distributed after compiling them to make them available to all the countries in the region and enable them to benefit from them.
2. A follow-up on the results of the questionnaire should be conducted, while focusing on the important joint issues, through more detailed questionnaires.

AGENDA ITEM 3.2

The future of food safety: Outcome of the first FAO/WHO/AU International Food Safety Conference and the International Forum on Food Safety and Trade - What's next?

With respect to this document, Egypt would like to propose the following:

Areas for actions are required	Member States (individually or regional grouping)	FAO/WHO	Other stakeholders	Timeline
Raise the awareness of the food facility operators on the importance of adhering to food safety standards - especially in the informal sector	Conduct national workshops in the capitals, cities and villages to raise awareness on the importance of food safety	<ul style="list-style-type: none"> - Provide educational tools - Contribute to the organization of workshops 	Formal sector for food facilities	Mid-2020
Increase the efficiency of food inspectors and the control system based on risk assessment	Organize training sessions for food inspectors and examiners (in the local market) and (on the borders)	<ul style="list-style-type: none"> - Conduct training sessions - Provide inspection and sampling tools - Standardize the control system 	All departments working in the control and inspection system	Mid-2020

Areas for actions are required	Member States (individually or regional grouping)	FAO/WHO	Other stakeholders	Timeline
Develop a national risk management and risk reduction system	<ul style="list-style-type: none"> - Support a high-level national risk management system - Prepare a national technical manual - Conduct trainings on integrated risk management procedures 	<ul style="list-style-type: none"> - Provide experts - Conduct training sessions - Transfer the experiences of developed countries 	Risk analysis and communication stakeholders	3 rd quarter of 2020
Develop a national pollution control system across the food chain	Provide training for an individual from each stage along the entire food chain	<ul style="list-style-type: none"> - Set the priorities - Provide experts - Conduct training sessions 		3 rd quarter of 2020
Raise awareness of food operators on the importance of recycling waste (Biotechnology / biofuels) to preserve the environment, reduce climate change and maintain sustainability	<ul style="list-style-type: none"> - Study national resources and study the current situation. - Contribute to the formulation of an integrated plan for the recycling of food waste 	<ul style="list-style-type: none"> - Provide educational tools - Raise awareness at all levels - Conduct workshops - Engage consumers 	<ul style="list-style-type: none"> - Participation, upon invitation. - Community organizations - Ministries of Environment and Energy 	End of 2020

AGENDA ITEM 3.3

Food safety and quality situation in countries in the region: Use of the online platform for information sharing on food safety control systems - status of information and future plans/prospects

Egypt's observations on the questions raised in this document are as follows:

a. Do countries confirm the value of exchanging information on their national food control systems?

- Yes, so that countries benefit from each other, and as an attempt to harmonize regulations with each other, which supports food control systems and facilitates trade movement.

b. If yes, is the online platform considered fit for purpose?

- The platform is not considered sufficient, especially as it is unknown and needs to be advertised extensively.

c. What are the issues preventing some 40 percent of Near East Member Countries from submitting information on their national food control systems?

As far as Egypt is concerned, it has completed its data, but the reasons could be as follows:

- The Codex Alimentarius has discontinued following on this issue for the past two years and many are unaware of it.
- The low level of responsiveness of the national authorities who do not provide the contact point with information.
- The existence of multiplicity and overlap in national systems, which makes it difficult to portray and formulate the tasks of the entire system clearly.

d. What are the reasons that make it difficult for Member Countries to share information regarding risk assessments?

For Egypt, the risk assessment system is not operational at the national level, although it was recently provided for in the national legislation. The following reasons may be preventing information sharing on risk assessment:

- The lack of studies on risk assessment infrastructure that would be represented through a clear management, structure and tasks.
- The absence of national databases.

- The existence of individual risk assessment studies that do not represent the national level.

e. What could be improved and how?

- Sending periodic reminders about the questionnaire through periodic Codex Circular Letters (CL).
- Publication of the questionnaire link on the pages of the Member State on the website of FAO, WHO and others.

f. How can FAO, WHO and the Regional Coordinator support countries to upload and utilize information on the online platform?

- By providing support to countries that were not responsive in terms of information compilation to determine the reasons behind this attitude, and by offering support in the evaluation of their national systems, and strengthening the capacities of focal points to enable them to carry out their tasks in coordination with the various bodies to collect the required data.

g. What additional questions on aspects of food control systems may be included, if further developed?

- What are the most important issues and critical points related to food safety at the national level?

AGENDA ITEM 4

Use of Codex standards in the region

Responses to the following questions to guide the future work of the Codex Secretariat in this area:

1- Next survey: Would you like to see a continuation of the survey? If so, which areas of Codex work would you like to see covered in future surveys?

Yes, and we would like to see food additives and contaminants included in future surveys.

2. Evaluation of Codex standards: How feasible do you consider responding to annual surveys on use of Codex standards? Which actions should be taken to increase survey response rates? Are there any national or regional efforts ongoing to assess the level of use of Codex standards?

- We consider that the survey is well answered, and Egypt believes that it needs to be well coordinated with the bodies concerned with its subject in order to obtain a response within the specified period.
- Concerning actions that should be taken to increase survey response:
- Organizing training courses for passive contact points.
- Raising awareness on the importance of using Codex standards.
- Coordinating between the different bodies and supporting the National Codex Committee (if any).

Ongoing national or regional efforts to assess the level of use of Codex standards:

There is no specific project in this regard, but currently in Egypt a project to support the Codex capacities at the national level is being developed, in coordination with the Codex Alimentarius Committee in Egypt and in collaboration with the Food and Agriculture Organization (FAO). The project relies on the diagnostic tool developed by FAO and WHO, which includes the collection of national-level data on the use of Codex standards. Egypt considers that it is necessary and important to have a specialized support team for a national project in this field.

AGENDA ITEM 6

Codex work relevant to the region

Egypt believes that the challenges that prevent members from stronger engagement in activities that are considered useful to them are as follows:

- The lack of financial resources, which reduces the actual participation in meetings.
- The poor capacities and databases available for electronic participation.
- The poor coordination between the concerned authorities.
- The lack of national awareness of the importance of participation in Codex work.

AGENDA ITEM 7.1

Implementation of the Codex Strategic Plan 2014-2019 (including Strategic Plan for CCNE 2014-2019)

Recommendations on the implementation of the Codex Strategic Plan (2014-2019):

- Egypt supports the adherence to the Codex Strategic Plan 2020-2025;

- Egypt considers that a separate plan for the Near East needs to be developed to monitor the activity and effectiveness of the countries of the Near East in implementing the activities of the Global Codex Strategic Plan based on the priorities of the region, since the assessment presented in the document shows a decrease in the effective participation of Near East countries in the Codex meetings.
- Egypt agrees on the need to establish a suitable mechanism to monitor progress or obstacles in relation to the implementation of the Codex Strategic Plan activities.

Strategy for monitoring Electronic Working Groups (EWGs):

1. What are your criteria for selecting EWGs?

- The importance of the subject of the working group for Egypt and its impact on the health of citizens.
- The importance of the commodity associated with the working group in terms of the economy and trade exchange.
- The existence of available capacities and capabilities (experts - laboratories - references)

2. What is your strategy for monitoring which EWGs are established by CAC or its subsidiary bodies? How do you monitor new developments in EWGs you signed up to?

- The procedures are outline in the answer to the next question.

3. How are you organized internally for participating in an EWG (e.g. work flow, authorization, collaboration)?

- The Egyptian Codex Contact Point (CCP) receives invitations to Electronic Working Groups and sends them immediately upon receipt to the relevant expert who in turn presents them to the technical committees concerned with the subject of the working group.
- Working groups are selected and approved internally according to the above criteria and then the expert sends a confirmation to the Egyptian Contact Point to register participation in the working group.
- A response is sent through the national contact point to the International Codex Secretariat to inform it of the Groups for which registration was made, based on the invitation.
- The expert will study the communication received from the working groups through the ad hoc technical committees and will prepare the response that is approved by the concerned department before sending it through the online forum of the working groups and then via the national contact point for information.
- Responses of working groups are compiled at the level of the national contact point through which evaluation and monitoring are conducted annually.

4. In which cases were you not able to participate in an EWG on a priority subject for your country? Why was this?

- Egypt is keen to participate in all the Electronic Working Groups that are of importance to Egypt and the region. It has already found some mistakes during the participation in the working groups, especially on the online forum and it has contacted the Secretariat to address the issue.
- Weak coordination between the various parties concerned with the subject of the working group.
- Lack of available data on important topics, despite their relevance.

5. How successful do you think your participation in EWGs is, and why?

- As previously mentioned, Egypt is keen to participate in Electronic Groups for all important priority issues. Egypt is successfully chairing an Electronic Working Group on "dried leaves" through the CCSC (Codex Committee on Spices and Culinary Herbs), with the participation of Sudan.

6. Which actions do you think are needed to enhance your participation in EWGs on priority subjects for your country?

- Improving the Electronic Groups online forum.
- Coordinating between different parties to raise awareness on the importance of participation in the subjects of the Electronic Working Groups.
- Identifying subject-matter experts from all fields concerned with Codex to invite them to participate in the discussion of topics of relevance for Egypt.

AGENDA ITEM 7.2**Codex Codex Strategic Plan 2020-2025 - Roadmap to implementation**

With regards to the priority goals and objectives on which the region will focus its contributions to the implementation of the Strategic Plan (2020-2025) for the next two years (2020-2021):

Egypt would like to propose the following:

Goal	Objectives	Activities	Means of contribution
3. Increase impact through the recognition and use of Codex standards	<ul style="list-style-type: none"> - Raise the awareness of Codex standards - Support initiatives to enable the understanding and implementation/ application of Codex standards - Recognize and promote the impact of Codex standards 	<ul style="list-style-type: none"> - Identification of initiatives directly supporting standards setting work and strengthening coordination among these to develop strong national infrastructures. - Identification of priority standards for Members and focusing on their use to address specific food safety and/or quality issues. 	These goals and objectives will contribute to raising awareness on the Codex Alimentarius, thereby achieving universal use of Codex standards as a reference for food safety and fair practices in the food trade.
4. Facilitate the participation of all Codex Members throughout the standard setting process	- Enable sustainable national Codex structures in all Codex Member Countries	Commitment to use the Codex diagnostic tool.	National evaluation of Codex regulations, identification of weaknesses, strengths and gaps and addressing these gaps
	- Increase sustainable and active participation of all Codex Members	<ul style="list-style-type: none"> - Prioritization of work areas of interest and following on the related standard setting work through all virtual opportunities provided. - Commitment from experienced countries and those who have benefitted from project support to provide mentoring to less experienced countries. 	Identification of priorities and experience-sharing on important issues for countries related to food safety
	Reduce barriers to active participation by developing countries	Identify 1-2 priority areas/barriers to focus on over the next 2 years, including proposed actions.	More effective and wider participation in Codex activities

AGENDA ITEM 10**Draft regional standard for mixed zaatar (step 6)**

Egypt approves the proposed draft and proposes the following:

2.1.1 Mixed Zaatar

It is the mix consisting of raw zaatar and broadleaf zaatar, as defined below, and the husk of sumac and sesame seeds, to which other ingredients may be added. The classification of mixed zaatar shall be as shown in Section 2.2.

3.2.1 Taste and Colour

Zaatar contained in the product must have a special flavour and smell and be free of any extraneous odours and flavours, including rancidity and mouldiness, as well as of any extraneous substances.

The product must have a normal colour and a consistency that is typical of such kind of products.

- Egypt would like to note that we need a clear identification of the color.

3.2.2.1.1 General Requirements

The following characteristics shall be observed in mixed zaatar:

All the ingredients used in the preparation of the mixed zaatar shall be in conformity with their corresponding Codex Alimentarius standards.

It shall be free of living insects and spiders, practically free of any visible moldiness, dead insects and

parts thereof, contamination by rodents, birds and snails waste (and magnification might be used for detection in some cases, provided and the magnifying power used should be indicated in the test results report).

The final product shall not be in a powder form in order to ensure its main ingredients are recognizable by microscopic inspection (leaves, blossoms, straws...) or visible to the naked eye, to avoid fraud and concealing of impurities therein, and to ensure that higher levels of volatile oils are maintained. The straws, if any, must not be longer than 10 mm and more than 2 mm in diameter, and must not make up more than 5% (mass/mass) of the product.

Any extraneous substances of non-vegetable origin found in the product, such as pebbles, soil, sand, dust, etc. or of non-food vegetable origin, such as wood, dry leaves, must not make up more than 1% (mass/mass) of the product.

- Egypt comment: it's better to put the previous points into a separated table titled (Physical characteristics) similar to the template of CCSC standards.

Table (1): Chemical Requirement

- Egypt requires identification of (Maximum superoxide number) for Premium Mixed Zaatar and Extra Mixed Zaatar.

4.1 RAW ZAATAR, "PREMIUM" MIXED ZAATAR AND "EXTRA" MIXED ZAATAR

- No food additives are permitted in particular colouring matters, except what shown in section 4.2.