

# codex alimentarius commission

FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD HEALTH  
ORGANIZATION

JOINT OFFICE: Via delle Terme di Caracalla 00100 Rome Tel.: 39.06.57051 Telex: 625825-625853 FAO I E-mail Codex@fao.org Facsimile:39.06.5705.4593

---

**Agenda Item 10 B**

**CX/FAC 02/12 - Add. 1**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS**

**Thirty-fourth Session**

**Rotterdam, The Netherlands, 11-15 March 2002**

### **PROPOSED DRAFT REVISED RECOMMENDED INTERNATIONAL CODE OF PRACTICE FOR RADIATION PROCESSING OF FOOD**

The following comments have been received from USA:

#### **USA**

This is in response to CX/FAC 02/12, which requests comments at Step 3 on the Revised Proposed Draft Recommended International Code of Practice for Radiation-Processing of Food. The United States of America appreciates the opportunity to provide comments for consideration by the 34<sup>th</sup> Session of the Codex Committee on Food Additives and Contaminants (CCFAC).

We believe that the proposed draft revision reflects the discussion of the 33<sup>rd</sup> session of the CCFAC and are pleased to offer the following comments.

#### 2.3 Definitions

In the definition of Food Irradiation, the term “electron beams” is employed. We suggest replacing this with “accelerated electrons,” as used in the first line of 2.1 (Scope).

We also propose deleting the expression “Authorization of Facility to Irradiate Food”. We believe that such an expression does not require a definition and, further, the expression is not employed anywhere in the document. It follows that the phrase “and expressions” in the first line of 2.3 should also be deleted.

#### 5.1 Design and Layout

In the last line of the third paragraph, the word “dose” should be inserted in front of “uniformity” in order to conform to that term defined in 2.3.

#### 6.3 Dosimetry

We suggest revising the second paragraph to read:

“Various techniques for dosimetry pertinent to radionuclide and machine sources are available for measuring absorbed dose in a quantitative manner. Relevant ISO/ASTM Standard Practices and Guides for dosimetry in food irradiation facilities have been developed and should be consulted.”

---

We recommend deleting footnote 5 until the revision of the 1977 reference becomes available. Additionally, we find footnote 6 not to be particularly informative. We suggest either deleting it or improving it (which we prefer) by citing specific ISO/ASTM Standards. Here are the three most relevant:

ISO/ASTM 51204 - Standard Practice for Dosimetry in Gamma Irradiation Facilities for Food Processing.

ISO/ASTM 51431 - Standard Practice for Dosimetry in Electron and Bremsstrahlung Irradiation Facilities for Food Processing.

ISO/ASTM 51261 - Standard Guide for Selection and Calibration of Dosimetry Systems for Radiation Processing.

#### 6.4 Dosimetry systems

Footnote 7: We recommend this footnote be changed by deleting the 1977 reference until the new revision is published and by updating the citation of the second reference to “ISO/ASTM 51261 - Standard Guide for Selection and Calibration of Dosimetry Systems for Radiation Processing.”

#### 6.5 Dosimetry and process control

Footnote 8: The citations need to be updated to “ISO/ASTM 51204 - Standard Practice for Dosimetry in Gamma Irradiation Facilities for Food Processing” and “ISO/ASTM 51431 - Standard Practice for Dosimetry in Electron and Bremsstrahlung Irradiation Facilities for Food Processing.”

### 9. COMPETENCY

We recommend deletion of this paragraph. We do not see that this paragraph adds anything new to what has been said earlier. The reference to “adequate, trained, and competent personnel” is already stated in 5.3.2 (Requirements for staff). We suggest moving footnote 10 into 5.3.2.