

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 3, 4, 6, 9, 11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

39th Session

FAO Headquarters, Rome, Italy, 27 June – 1 July 2016

(Comments of Gambia)

GENERAL COMMENT

Gambia appreciates the opportunity to comment on the following agenda items.

Agenda Item 3 Final adoption of Codex texts at Steps 8, 5/8 and 5A

Part 1 – Standards and related texts submitted for adoption:

(I) PROPOSED DRAFT STANDARD FOR AUBERGINES FOR ADOPTION AT STEP 5/8 (WITH OMISSION OF STEP 6/7) (PARA 51 AND APPENDIX III)

COMMENT:

Gambia supports adoption the proposed draft standard at step 5/8.

RATIONALE

- Allowances for decay, soft rot and/or internal breakdown in the three quality classes i.e. “Extra” Class, Class I and Class II are necessary for the realistic application of the standard in international trade
- Inclusion of allowances for decay, soft rot and/or internal breakdown in the three quality classes reflects current industry and trade practices for international trade of fresh fruits and vegetables
- The proposed tolerances for decay, soft rot and/or internal breakdown of 1% in “Extra” Class and 1% in Class I applies to different percentages of tolerances for the whole lot i.e. 5% of produce not satisfying the requirements of “Extra” Class and 10% of produce not satisfying the requirements of Class I respectively and therefore, there was a distinction between the allowances for decay in “Extra” Class and Class I
- Fresh fruits and vegetables are perishable produce subject to long distance transportation and storage, which may result in a certain degree of decay mainly due to enzymatic reactions in the produce that should not lead to the rejection of the lot
- Minimum tolerances for decay are a common industry and trading practice, however, the absence of such tolerances in an international standard like Codex would imply “zero” defect is the acceptable norm and this could create technical barriers to trade while the objective of Codex standards is to facilitate trade in food
- Phytosanitary and food safety rules will always overrule agricultural quality standards especially when the tolerated decay is mainly caused by inherent enzymatic reactions (and some non-pathogenic micro-organisms) and **not** pathogenic microbial reactions.

(II) Sampling Plans (Para. 8) And Amendments to The Food Additive Provisions of Several Standards for Fish And Fishery Products (Para. 56, Appendix VI); (II) Section 7.4.

COMMENT:

Gambia supports this recommendation

RATIONALE

The Committee did not accept the sampling plans as proposed by CCMAS, noting that it was difficult to understand and use hence requested CCMAS to elaborate simpler guidelines including sampling plan.

(III) Estimation of Fish Content of the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter (Codex Stan 166-1989) (Para. 63, Appendix VII); And (Iii) Section 11 – Processing of Salted and Dried Salted Fish of the Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003) (Para. 66a, Appendix VIII).

COMMENT:

Gambia supports the adoption of the amendment and discontinuation of work on Appendix 1-11 to the code of practice for Fish and Fishery Products.

(IV) Proposed Draft Guidelines for The Control of Non-Typhoidal Salmonella Spp. In Beef and Pork Meat (Para. 22 And Appendix II)

COMMENT:

Gambia supports adoption of the proposed draft guidelines for the Control of Non-typhoidal Salmonella spp. in Beef and Pork Meat at Step 5/8 (with the omission of Step 6/7)

RATIONALE

Document was extensively discussed at PWG with no outstanding issues; Comprehensive, user friendly and addresses key issues of food safety. Hazard-based and GHP-based control measures for non-typhoidal *Salmonella* Spp have been adequately addressed to protect public health and safety.

(V) Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of Foodborne Parasites (Para. 30 And Appendix III)

COMMENT:

Gambia supports adoption of the proposed draft guidelines on the Application of General Principles of Food Hygiene to the Control of Foodborne Parasites at Step 5/8 (with the omission of Step 6/7)

RATIONALE

Extensive discussions and consensus reached by EWG and plenary (CCFH47). No outstanding issues. Guidelines not a standalone document and must be used in conjunction with other documents such as WHO Guidelines for drinking water. Anisakis allergenicity was well addressed providing information on consumer education for protection of public health and safety.

(VI) Proposed Draft Annex III “Spices and Dried Aromatic Herbs” to The Code of Hygienic Practice for Low Moisture Foods (Para. 41 And Appendix IV).

COMMENT:

Gambia supports adoption of the proposed text on Annex III (Spices and dried aromatic herbs).

RATIONALE

The document is now an Annex to the Code of Hygienic Practice for LMF.

(VII) DRAFT STANDARDS AND RELATED TEXTS AT STEP 5/8 OF THE PROCEDURE: AMENDMENTS TO THE ANNEX OF THE GUIDELINES ON NUTRITION LABELLING (CAC/GL2-1985) (PARA. 52A), APPENDIX II, PART II);

COMMENT:

Gambia supports their adoption

RATIONALE

The footnote as amended will add clarity to the table and ensure consistency in the guidelines and enhances common understanding for the terminology.

(VIII) MAXIMUM LEVEL FOR INORGANIC ARSENIC IN HUSKED RICE AT STEP 8 (PARA. 45, APPENDIX II);

COMMENT:

Gambia agrees to continue supporting the compromise ML value of 0.35 mg/kg for inorganic arsenic in husked rice.

RATIONALE

Rice is a major staple food in several African countries and protection of human health is of utmost importance. It should however be noted that ML established may affect availability of rice significantly. From this point of view, it is not appropriate to allow a high violation rate.

(IX) MAXIMUM LEVELS FOR LEAD IN FRUIT JUICES AND NECTARS, READY-TO-DRINK (INCLUSION OF PASSION FRUIT); CANNED FRUITS (INCLUSION OF CANNED BERRIES AND OTHER SMALL FRUITS); CANNED VEGETABLES (INCLUSION OF CANNED LEAFY VEGETABLES AND CANNED LEGUME VEGETABLES); JAMS, JELLIES AND MARMALADES (LOWER ML AND INCLUSION OF MARMALADES); PICKLED CUCUMBERS (LOWER ML); PRESERVED TOMATOES (LOWER ML AND NOTE ON THE APPLICATION OF A CONCENTRATION FACTOR); AND TABLE OLIVES (LOWER ML) AT STEPS 5/8 (PARA. 89, APPENDIX III);

COMMENT:

Gambia supports adoption of lowering the standard of lead.

(X) REVISED CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF MYCOTOXIN CONTAMINATION IN CEREALS (CAC/RCP 51-2003) (GENERAL PROVISIONS) AND ITS ANNEXES ON ZEARELENONE, FUMONISINS, OCHRATOXIN A, TRICHOHECENES AND AFLATOXINS, AT STEPS 8 AND 5/8 (SPECIFIC PROVISIONS) (PARAS. 124 AND 128, APPENDIX IV).

COMMENT:

Gambia supports the adoption of a revised Code of practice.

(XI) PROPOSED DRAFT ANNEXES ON ZEARELENONE, FUMONISINS, OCHRATOXIN A, TRICHOHECENES AND AFLATOXINS (SPECIFIC PROVISIONS) AT STEP 8 AND STEP 5/8 RESPECTIVELY (PARAS. 124 AND 128, APPENDIX IV)

COMMENT:

Gambia supports the adoption of the proposed draft annexes on zearalenone, fumonisins, ochratoxin A, trichothecenes and aflatoxins (specific provisions).

RATIONALE

The Annexes submitted to CCCF9 were returned for further development and comment at step 2/3, particularly for new developments related to deoxynivalenol (DON). These issues are of particular interest to the African situation and the development of Annexes should include the latest information available on mycotoxin control.

Part 2 – Standards and related texts held at Step 8 by the Commission**PROPOSED DRAFT MRLS FOR RECOMBINANT BOVINE SOMATOTROPINS (RBSTs) FOR ADOPTION AT STEP 8 BY CAC39****Comment:**

Having reviewed the report based on the questions forwarded to JECFA 78 by CAC35, Gambia supports adoption of rbSTs at step 8.

RATIONALE

Based on a systematic review of the literature published since the last evaluation, JECFA reaffirmed its previous decision on the ADI “not specified” for somagrebove, sometribove, somavubove and somidobove. Following are questions forwarded by the 35th CAC to JECFA on rbSTs Matters which in our opinion have been adequately addressed.

Agenda Item 4 Adoption of Codex texts at Step 5**PROPOSED DRAFT STANDARDS FOR GARLIC AND KIWI FRUIT FOR ADOPTION AT STEP 5 (PARAS 70, 76 AND APPENDICES IV AND V RESPECTIVELY****COMMENT:**

Gambia supports adoption of the proposed draft standards for Garlic and Kiwifruit for adoption at Step 5.

Agenda Item 6 Approval of New Work

APPROVAL FOR NEW WORK - GUIDELINE FOR READY TO USE THERAPEUTIC FOOD” (RUTF) (PARAS 87-88 AND APPENDIX IV)

COMMENT:

Gambia supports the development of a Codex guideline rather than a Codex Standard.

RATIONALE

Gambia recognizes the important role of RUTF in the management of SAM (Severe Acute Malnutrition), however, to ensure sustainability and acceptance, these products should be based on locally available foods mainly due to cultural preferences in foods and normal feeding patterns to as much extent possible. In addition, a guideline will assist the African governments as an advisory document to develop appropriate strategies especially in the management of SAM but also putting in place mechanism to prevent their occurrence through appropriate feeding practices. Current RUTF are costly and not affordable compared to local foods.

Agenda Item 9 Codex work Management and Functioning of the Executive Committee

CODEX WORK MANAGEMENT AND FUNCTIONING OF THE EXECUTIVE COMMITTEE (REP 16/GP APP.II, CX/CAC 16/39/10)

SECTION 2 - Review Framework

COMMENT:

With regards to the purpose of the review, Gambia supports the option in bullet 2 i.e.

“Assess the efficiency and effectiveness of Codex work management practices according to SG4 of the Codex Strategic Plan (2014-2019)”

RATIONALE

Within the Codex Strategic Plan 2014-2019, there are adequate inbuilt continuous progress monitoring mechanism to ensure that Codex processes run smoothly and efficiently. In fact, Strategic Goal 4 (SG4) which reads *“Implement effective and efficient work management systems and practices”* provides the means for evaluating the efficiencies or inefficiencies in Codex work management practices. SG4 therefore captures exactly the intent of the Codex Secretariat led-internal review. Conducting the review according to SG4 will ensure that the CAC focuses on the significant issues relevant to the improvement in the effectiveness and efficiency of Codex work. Consequently we support the inclusion of the first bullet under section 2.2 i.e. scope.

SECTION 3 - REVIEW METHODOLOGY

COMMENT:

Gambia supports the inclusion of the bracketed word *“validate”* as indicated in the text below:

Before beginning its work the Secretariat will provide Members with an opportunity to review [and validate] the materials to be used

RATIONALE

- Validation of the review materials is necessary to ensure that Codex members have a common understanding of issues which will be raised in the review material, hence lead to the provision of appropriate responses.
- As a major proponent of inclusiveness in standard-setting process, the Commission has an obligation to ensure that all Codex members are involved in the review process from the onset. Providing members with an opportunity to validate the review materials clearly will contribute to ensuring that Codex members own the review process.

CONSISTENCY OF THE RISK ANALYSIS TEXTS ACROSS THE RELEVANT COMMITTEES

COMMENT:

Gambia supports the recommendations to the Commission that with regard to the Consistency of the Risk Analysis Texts across the Relevant Committees:

- i. CCNFSU should revise the text on nutritional risk analysis and consider how to include JEMNU as a primary source of scientific advice; and
- ii. The Secretariat should address minor numbering issues in the texts for CCCF, CCRVDF and CCPR with the relevant Committees.

RATIONALE

This is necessary to ensure consistency in all risk analysis text used by relevant Codex Committees.

Agenda Item 11 Codex work on antimicrobial resistance**FUTURE WORK OF CODEX ON ANTIMICROBIAL RESISTANCE (CX/CAC 16/39/12)**

Gambia noted the important decisions taken by the Governing bodies of FAO and WHO namely:

- i. The WHO Global Action Plan on Antimicrobial Resistance
- ii. FAO Resolution of Antimicrobial Resistance

Considering the serious challenges which AMR presents to humans, animals and the environment it is important to have coordinated efforts at the national and international level to address issues related to AMR. Through the support of FAO, WHO and OIE several strategies are being established in the African region to address AMR threat. One key area is the development of national Action Plans on AMR. The decisive steps taken by FAO and WHO would contribute immensely in providing focused guidance to countries on preventing or reducing AMR.

Concerning the recommendations as set out in Section 5, para 49 – Recommendations, the following are our comments:

i. Start new work on:

- a. The revision of the *Code of Practice to Minimise and Contain Antimicrobial Resistance* (CAC/RCP 61-2005) and
- b. The development of Guidance on Integrated Surveillance of Antimicrobial Resistance;

COMMENT:

Gambia supports the start of new work on the revision of CoP and Guidance on Integrated Surveillance of AMR

RATIONALE

There has been new developments in the area of AMR since the standard (CoP) was developed in 2005 hence a revision would help address gaps and incorporate these new developments to make the standard relevant in a field where new issues are emerging rapidly.

ii. Establish a dedicated Task Force on AMR and identify a host country(ies)**COMMENT:**

Gambia supports this recommendation and look forward to discussing the Terms of Reference for a Task Force on AMR

RATIONALE

Gambia believes that given the global nature of the problem of AMR and that fact that various international organizations are involved in tackling the threat to AMR, it is prudent to ensure wider consultation on the ToR for the Task Force to be established. This is necessary to avoid duplication of work and ensure that global efforts to address AMR are complementary.

iii. Request FAO/WHO to provide scientific advice on AMR, in collaboration with OIE**COMMENT:**

Gambia supports the request to FAO/WHO to provide scientific advice on AMR in collaboration with OIE.

RATIONALE

Codex standards must be based on sound science reflecting current developments. Gambia considers the following key questions (Appendix III of CX/CAC 16/39/12) for which scientific advice would be sort as critical to the revision of existing text on AMR and development of guidance on integrated surveillance of AMR.

- Undertake a review of new data relevant to the development and transmission of antimicrobial resistance through the food chain
- With particular reference to the WHO and OIE lists of Critically Important Antimicrobials, existing Codex MRLs and the most recent scientific information on resistance and its occurrence in the food chain

- Provide advice on alternatives to antimicrobials, in particular value chains, which would support behaviour change and encourage the implementation of practices aimed at addressing AMR, considering the challenge faced by the food and agriculture sector to change practices as well as meet the global food needs.

iv. Request FAO and WHO to develop a capacity development programme to respond to the need identified.

COMMENT:

Gambia supports the recommendation on the need for FAO/WHO to develop capacity building programmes. Specific areas of concern which should be addressed include but not limited to the following:

- Inadequate knowledge and expertise for conducting risk analysis of foodborne AMR
- Weak or non-existing regulatory framework on AMR
- Absent or ineffective national monitoring and control programmes on the use of antimicrobials