CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX ALIMENTARIUS COMMISSION
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COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED TO THE COMMISSION FOR ADOPTION AT STEP 5

(Comments submitted by 15 June 2017)

This document compiles the comments on the Draft Standards and Proposed Draft Standards, at Step 5 of the Procedure, submitted through the Codex Online Commenting Systems (OCS). The comments are as shown in the Appendix.

The Online Commenting System (OCS) is an online tool that enables contact points to submit comments on draft texts in a standardised way thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016) OCS has been used for different Codex Committees.

EXPLANATORY NOTES ON THE APPENDIX

Structure of Comments

The Comments submitted have been presented in a table format, with each Table divided into two (2) columns:

First Column – Provides the proposed changes made by contact points on the text, and is divided into general comments and comments specific to a paragraph.

Second Column – Provides the rationale (explanation) of the comment, and its author. For general comments, only the author of the comment is included.

APPENDIX

TABLE OF CONTENTS

Committee on Residues of Veterinary Drugs in Foods
Comité sur les résidus de médicaments vétérinaires dans les aliments
Comité sobre Residuos de Medicamentos Veterinarios en los Alimentos

Proposed draft RMR for gentian violet (REP17/RVDF Para 50, Appendix II)

Comments of: Bolivia (Plurinational state of), Chile, Canada, Egypt, European Union, Kenya, Peru,

Text	**Comment/Justification**
Kenya accepts the proposed draft risk management recommendation for Residues of Veterinary drugs(Gentian Violet) at step 5 of the elaboration procedure.	*Kenya*
El Perú está de acuerdo de mantener el apoyo a la redacción propuesta para la medida de gestión de riesgos para la violeta de genciana, en relación a lo siguiente: “En vista de las conclusiones del JECFA basadas en la información científica disponible, no existe un nivel seguro de residuos de violeta de genciana o de sus metabolitos en los alimentos que represente un riesgo aceptable para los consumidores. Por esta razón, las autoridades competentes deberían prevenir la presencia de residuos de violeta de genciana en los alimentos. Esto puede lograrse evitando utilizar el violeta de genciana en los animales destinados a la producción de alimentos.” La decisión de tal medida se sustenta en la necesidad de que si bien es cierto no se tiene la certeza de los posibles riesgos que puede traer el uso de violeta de genciana en animales de producción de alimentos, como medida de cautela o precaución el Perú debe adoptar medidas provisionales que prohíban el uso de la mencionada sustancia en animales destinados a la producción de alimentos.	*Peru*
Perú apoya la redacción propuesta por el Codex, como medida recomendada para la gestión de riesgos para el violeta de genciana	*Peru*
The European Union supports the proposed risk management recommendation forwarded to CAC 40 for adoption at step 5 (REP17/RVDF, para.50 and Appendix II) as stated below: GENTIAN VIOLET (antibacterial, antifungal and anthelminthic agent) JECFA evaluation: 78th (2013) JECFA Recommended risk management measures In view of the JECFA conclusions on the available scientific information, there is no safe level of residues of gentian violet or its metabolites in food that represents an acceptable risk to consumers. For this reason, competent authorities should prevent residues of gentian violet in food. This can be accomplished by not using gentian violet in food producing animals.	*European Union*
Egypt agrees with forwarded the proposed draft Risk Management Recommendation (RMR) for gentian violet to CAC40 for adoption at Step 5	*Egypt*
Bolivia no tiene comentarios al documento, luego del analisis realizado en el comité espejo.	*Bolivia (Plurinational State of)*

ANTEPROYECTO DE RECOMENDACIONES SOBRE LA GESTIÓN DE RIESGOS PARA RESIDUOS DE MEDICAMENTOS VETERINARIOS Chile apoya el avance de la recomendación sobre la gestión de riesgos (RGR) para el violeta de genciana	*Chile* Justificación: Este tipo de recomendación, ya ha sido apoyado en otros productos como son el: Carbadox, Cloranfenicol, Clorpromazina, Estilbenos, Furazolidone, Nitrofural, Olaquindox y Verde de Malaquita, presentes en el CAC/MRL 2-2015.
In view of the JECFA conclusions on the available scientific information, there is no safe level of residues of gentian violet or its metabolites in food that represents an acceptable risk to consumers. For this reason, competent authorities should prevent residues of gentian violet in food. This can be accomplished by not using gentian violet in food producing animals	
In view of the JECFA conclusions on the available scientific information, there is no safe level of residues of gentian violet or its metabolites in food that represents an acceptable risk to consumers. For this reason, competent authorities should prevent residues of gentian violet in food~~. This can be accomplished by not using gentian violet in food producing animals.~~ .	*Canada* Canada appreciates the opportunity to comment on the Codex Circular letter arising from the work of the 23rd Session of the Codex Committee on Residues of Veterinary Drugs in Foods. Regarding the risk management recommendation for residues of gentian violet in food, Canada agrees that as the safety of residues of gentian violet in food cannot be assured, competent authorities should prevent residues of gentian violet in food. However, Canada considers that the last sentence of the recommendation “This can be accomplished by not using gentian violet in food producing animals” is rather redundant. The final risk management recommendation for the Committee to consider could therefore be as follows: “In view of the JECFA conclusions on the available scientific information, there is no safe level of residues of gentian violet or its metabolites in food that represents an acceptable risk to consumers. For this reason, competent authorities should prevent residues of gentian violet in food.”

Coordinating Committee for Africa
Comité FAO/OMS de coordination pour l'Afrique
Comité Coordinador FAO/OMS para África

Proposed draft regional standard for fermented cooked cassava based products (REP17/AFRICA Para 74, Appendix II)

Comments of of Egypt, Albania, Benin, Bolivia(Plurinational State of), Syrian Arab Republic and Kenya

Text	**Comment/Justification**
Egypt supports the draft regional standard for fermented cooked cassava based products proposed from (Africa) to be adopted at Step 5	*Egypt*
OK.	*Albania*
The document is well written. However the scientific names should be in italic throughout the entire document. For example Manihot esculenta Crantz should be Manihot esculenta Crantz **Paragraph 2: Description,** line 2. These products are obtained from fresh cassava roots, peeled, cut, soaked in water for fermentation and pressed and dried before packaging and cooking. I propose having two sentences to read as follow: These products are obtained from fresh cassava roots, peeled, cut, soaked in water for fermentation. Thereafter, pressed, dried before packaging and cooking	*Benin* Paragraph 2: Description, line 2, the sentence is too long and I propose having two sentences
Paragraph 5: Contaminants. The products covered by this Standard shall comply with the Maximum Levels of the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995).	*Benin* I propose the above sentence be deleted from the standard. This sentence refers mainly to mycotoxin in food and feed. Research works have proved that cassava and cassava based products are not prone to mycotoxin contamination. A list of scientific publications below provide the scientific basis. Further, it is important to note that processed cassava based products, in this case fermented cooked cassava product, even after opening at household level could be spoiled by fungi (hygienic matter that is addressed in paragraph 6 of the document) but the mycotoxin cannot be produced. Yann C Adjovi, Sylviane Bailly, Benoit Gnonlonfin, Souria Tadrist, Arlette Quérin, Ambaliou Sanni, Isabelle P.Oswald, Olivier Puel, Bailly Jean-Denis. Analysis of the contrast between natural occurrence of toxigenic Aspergilli of the Flavi section and Aflatoxin B1 in cassava. 2014. Food Microbiology Journal, 38, 151-159. • G.J. Benoit Gnonlonfin, Leon Brimer. Cassava (Manihot esculenta Crantz) as a source of chemically safe food: a critical review. 2014, as a chapter in book. NOVA Sciences Publishers, online publication, https://www.novapublishers.com/catalog/product_info.php?products_id=39978&osCsid=c27d631644f806b2eff90cb63b927896 • G.J. B. Gnonlonfin, Y. Adjovi, David R. Katerere, Gordon S. Shephard, A. Sanni and L. Brimer. Mycoflora and absence of aflatoxin in commercialized cassava chips in Benin, West Africa. 2012. Food Control 23, 333-337.

	• G.J. Benoit Gnonlonfin, Ambaliou Sanni and Leon Brimer. Review Scopoletin – a coumarin phytoalexin with medical properties. 2012. Critical Reviews in Plant Sciences 31 (1), 47-56 • G.J.B. Gnonlonfin, Y. Adjovi, F. Gbaguidi, J. Gbenou, L. Brimer and A. Sanni. Scopoletin in cassava products as an inhibitor of aflatoxin production. 2011. Journal of Food Safety. doi: 10.1111/j.1745-4565.2011.00334.x • Manjula, K., Hell, K., Fandohan, P., Abass, A. and Bandyopadhyay, R. (2009). Aflatoxin and fumonisin contamination of cassava products and maize grain from markets in Tanzania and republic of the Congo. Toxin Rev. 28: 63–69. • Rafiatou Ba, Fernand Gbaguidi, Gouton Alban Houngbeme, Justin Kohoude, Gbemenou Joselin Benoit Gnonlonfin, Fatiou Toukourou and Lamine Baba-Moussa. Influence of the drying on the scopoletin induction of cassava chips produced in Benin. 2016. International Journal of Applied Biology and Pharmaceutical Technology, 7, 235-242.
No tenemos comentarios al documento.	*Bolivia (Plurinational State of)*
We want to add the following parameters to quality factors: - fat - protein - starch - total sugars	*Syrian Arab Republic* There are alot of studies about cassava, so we want to provide you with the following study: Oyewole, O.B and Alolami, O.A.2001. Quality and preference of different cassava varieties for “lafun”production. The Journal of Food Technology in Africa. vol. 6 no.1, 27-29. On the other side this draft has not mentioned the other methods of fermentation like utilization of RHIZOPUS ORYZAE
OK.	*Albania*
3.~~2~~ 2 Specific Quality ~~Factors~~ Factors We propose the adoption of the values of the table 3.2 and therefore open the brackets. The values of the parameters provided are maximum.	*Kenya* Kenya proposes and supports the adoption of the Proposed Draft Regional Standard for Fermented Cooked cassava Based Products(AFRICA) at step 5 with the specific comments below. Rationale: Above 35% water content, there is a higher probability of spoilage in the product. The crude fibre and ash content are inherent in cassava and therefore are indicators of state of maturity of the cassava.

Proposed draft Regional Standard for *Gnetum Spp* leaves (REP 17/AFRICA Para 83, Appendix IV)

Comments of of Egypt, Albania, Syrian Arab Republic and Bolivia(Plurinational State of)

Text	**Comment**
Egypt supports the draft regional standard for leaves of gnetum spp. proposed from (Africa) to be adopted at Step 5	*Egypt*
OK.	*Albania*
No comments	*Syrian Arab Republic*
No tenemos comentarios al documento.	*Bolivia (Plurinational State of)*
Appendix IV	*Somalia* The data in appendix IV lacks the source of reference method used during the product compositional analysis of the metals and the determination of crude composition of the other non-metal parameters.
DRAFT REGIONAL STANDARD FOR FRESH WHOLE AND SLICED LEAVES OF *GNETUM spp*. (AFRICA)	*Somalia*
ok.	*Albania*
~~APPENDIX~~APPENDIX 1	*Kenya*
Metal composition of Gnetum africanum	*Kenya* Kenya proposes the adoption of the draft Regional Standard for leaves of Gnetum spp at step 5 with the following additions outlined. However, we note that the table on ‘‘mineral composition’’ in appendix 1 in the standard would be worked out by the eWG re-established during the CCAFRICA 22 meeting as per the report(REP17/AFRICA para 82.(c))
~~Metal~~ mineral composition of Gnetum africanum	*Kenya*

Committee on Fats and Oils
Comité sur les graisses et les huiles
Comité sobre Grasas y Aceites

Proposed Draft Revision to the *Standard for Named Vegetable Oils: Addition of Palm Oil with high Oleic Acid (OxG)* (CODEX STAN 210-1999)
(REP17/FO Para 43, Appendix V)

Comments of Albania, Canada, Colombia, Costa Rica, Cuba, Ecuador, Egypt, Kenya, Peru, and Syrian Arab Republic,

Text	**Comment/Justification**
OK.	*Albania*
Kenya accepts the proposed revision to the standard for named vegetable oils (CODEX STAN 210-1999). Part 1- addition of palm oil with high oleic Acid (OXG) we uphold our previous submission at step 3; that the definition of palm oil is acceptable since its specific to the hybrid palm fruit OxG and therefore agree to the opening of the square brackets.	*Kenya*
1) REP17/FO- Rev Appendix V (on pages 33-35) <u>– Proposed Addition of Palm Oil with High Oleic Acid (OXG) at Step 5</u> [CL 2017/42/OCS-FO PART 1: Addition of Palm oil with High Oleic Acid (OXG) (in section 2.1 – Product definition and in section 3.1, Table 1), at Step 5] Under Section 2.1, the proposed definition states: [Palm oil – high oleic acid (high oleic acid palm oil) is derived from the fleshy mesocarp of hybrid palm fruit OxG (Elaeis oleifera x Elaeis guineensis).]	*Canada* Canada notes that the 25th session of CCFO agreed to request CCFL advice on what might constitute high and mid oleic acid in vegetable oils. Canada reiterates its position that it may be more appropriate to name this oil as “palm oil – mid oleic acid (mid-oleic acid palm oil)” as the content of oleic acid is more consistent with other oils of this category in the Standard for Named Vegetable Oils. Under Section 3.1, Table 1: Canada agrees with the changes proposed in this section, noting that this has been discussed at the 25th session of the CCFO where there appears to be consensus among the other delegations, and that the needs of all member countries were considered when the levels for the various parameters were set.
No comments	*Syrian Arab Republic*
Colombia apoya que la definición del producto quede como está planteada en el anteproyecto “aceite de palma- alto ácido oleico (aceite de palma con alto contenido de ácido oleico)”. Lo anterior teniendo en cuenta: - Dentro de la Norma para aceites vegetales especificados CODEX STAN 210-1999, no existe clasificación de los aceites que permitan determinar si son de alto, medio o bajo contenido de ácido oleico. Es por esto, que se considera que la comparación no debe hacerse sobre el porcentaje (%) de ácido oleico con otros aceites similares dentro de la norma (por ejemplo: el aceite de semilla de girasol y aceite de semilla de cártamo) donde en el perfil de ácidos grasos, se tienen rangos diferentes mostrando incluso valores de ácido oleico del 70%. - Consecuentemente con esta apreciación, Colombia considera que no se puede comparar el porcentaje de este ácido graso (numerado como C18:1 en el Stand) de este aceite, con otros	*Colombia*

aceites provenientes de especies vegetales diferentes, sino que debe realizarse con el contenido del aceite de palma. a. En los análisis realizados a las semillas hibridas OxG en el país, los datos del contenido de ácido oleico (C18:1) han arrojado valores superiores a los obtenidos para el aceite de palma.	
Perú no tiene observaciones al documento	*Peru*
Cuba no tiene comentarios que añadir	*Cuba*
PART 1 – ADDITION OF PALM OIL WITH HIGH OLEIC ACID (OXG) .	*Egypt* Egypt disagrees with the proposed of addition of palm oil with high oleic acid (at step 5) and submit the conclusion of The twenty-fifth Session of the Codex Committee on Fats and Oils (CCFO) was held in Kuala Lumpur, Malaysia, from 27 February to 3 March 2017 , the fallowing paragraphs: 42. The Committee noted that substantial progress had been made on the proposed draft revision (Section 3) and that the use of the term “high oleic acid palm oil” under product definition needed further consideration 43. The Committee agreed to: (i) Place the product definition in section 2.1 in square brackets; (ii) Forward the proposed draft revision to the Standard for Named Vegetable Oils (CODEX STAN 210-1999): Addition of Palm Oil with high Oleic Acid (OXG) (Appendix V) to CAC40 for adoption at Step 5. (iii) Request CCFL advice on what might constitute high and mid oleic acid in vegetable oils. The Committee agreed to: (i) Place the product definition in section 2.1 in square brackets; (ii) Forward the proposed draft revision to the Standard for Named Vegetable Oils (CODEX STAN 210-1999): Addition of Palm Oil with high Oleic Acid (OXG) (Appendix V) to CAC40 for adoption at Step 5. (iii) Request CCFL advice on what might constitute high and mid oleic acid in vegetable oils
PARTE 1 – ADICIÓN DE ACEITE DE PALMA CON ALTO CONTENIDO DE ÁCIDO OLEICO (OXG)	**Ecuador** El Ecuador agradece a los países que lideran la elaboración de la PROPUESTA DE REVISIÓN DE LA NORMA referente a la ADICIÓN DEL ACEITE DE PALMA CON ACIDO OLEICO ALTO (OXG); y al respecto se señala lo siguiente: El Ecuador reconoce la importancia del tema y comprende las diferentes realidades de los países y sus relaciones comerciales, sin embargo considera que se debería tomar en cuenta que el aceite de palma hibrido OXG ecuatoriano contiene en su composición mayor índice de ácidos grasos insaturados y un mayor valor de índice de yodo, por tal motivo, debería considerase como tal; por su naturaleza es un aceite de alto contenido oleico y no debería ser comparado con aceites de mediano contenido oleico. En este sentido, el país guarda su reserva en el avance de esta

	Norma y solicita a la comisión del Codex Alimentarius se revise a profundidad este proyecto al Comité de Grasas y Aceites - CCFO.
Costa Rica agradece la oportunidad de emitir comentarios. En este sentido, expresamos nuestro apoyo al documento en el trámite 5.	**Costa Rica**
(50 °C/water ~~a~~ at 20 ºC)	Kenya

Committee on Contaminants in Foods
Comité sur les contaminants dans les aliments
Comité sobre Contaminantes de los Alimentos

Proposed draft maximum levels for lead in certain processed fruits and vegetables (REP17/FC Para 88, Appendix II)

Comments of Albania, Canada, Costa Rica, Ecuador, Egypt, Indonesia, Kenya,

Text	**Rationale**
General comments	
OK	**Albania**
Canada would like to express its support for the lead MLs and their position in the Codex step procedure as outlined in Appendix II of REP17/CF: pulses (0.1 mg/kg, step 5/8); jams, jellies and marmalades (0.4 mg/kg, step 5/8); canned brassica vegetables (0.1 mg/kg, step 5), preserved tomatoes (0.05 mg/kg, step 8); processed tomato concentrates (0.05 mg/kg, step 5); and canned chestnuts and canned chestnut puree (0.05 mg/kg, step 5/8). Canada would like to express its support for the additional text or other information included in the Notes/Remarks section of the draft entry to the GSTCFF as outlined in Appendix II of REP17/CF	**Canada**
Costa Rica apoya su adopción.	**Costa Rica**
Egypt supports the following: * Maximum Levels for Arsenic and Lead in Edible Fats and Oils * REVISION OF THE MLs FOR LEAD IN CERTAIN PROCESSED FRUITS AND VEGETABLES To be adopted at step 5, 5/8 and 8	**Egypt**
• Indonesia supports ML of 0.4 mg/kg for jams, jellies and marmalades • Indonesia supports ML of 0.1 mg/kg for canned brassica • Indonesia supports to add a reference to Standard for Fish Oils to the remarks column of the ML for lead in edible fats and oils	**Indonesia**
Kenya has no objection for standards which are at steps 5, 8 and 5/8 for approval by CAC-40.	**Kenya**

Coordinating Committee for Near East
Comité FAO/OMS de coordination pour le Proche-Orient
Comité Coordinador FAO/OMS para el Cercano Oriente

Proposed draft Regional Standard for mixed Zaatar (REP17/NE Para 85, Appendix IV)

Comments of Albania, Syrian Arab Republic, Mexico, Egypt, Jordan

Text	**Rationale**
General comments	
OK.	**Albania**
No comments on the draft.	**Mexico**
Thanks for your efforts you have mentioned in the section 2.2.3 (regular mixed zaatar) that the maximum level of citric acid is 4%, then in section 5.2 you have set the maximum level with 4mg/kg, and we think it is more logical than 4% for the percent of salt, we think that the percent of 6% and 7% is very high, so we suggest it to be 2% maximum	**Syrian Arab Republic**
Specific comments	
PROPOSED DRAFT REGIONAL STANDARD FOR ~~MIXED ZAATAR~~ZAATAR MIXTURE	**Egypt**
1. Scope This Standard determines the requirements and characteristics that shall be present in mixed zaatar with other herbs and ingredients (husk of sumac and sesame seeds, to which other ingredients may be added) intended for direct human consumption and used in many food preparations such as Lebanese mankoushe, etc.	**Egypt**
2. Description **2.1 Definition** **2.1.1 Mixed zaatar** It is the mix consisting of dried 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 zaatar shall be as shown in Section 2.2.	**Jordan**
2. Description **2.2 Classification** **2.2.1 "Premium"Mixed zaatar** It shall consist of at least 25% of raw broadleaf zaatar mixed exclusively with: sesame seeds and sumac husk, with the possibility of adding salt by ~~6%~~ 4% maximum.	**Jordan**
It shall consist of at ~~least 25%~~ least 40 % of raw broadleaf zaatar mixed exclusively with: sesame seeds and sumac husk, with the possibility of adding salt by 6% maximum.	**Jordan**
2.2.2 "Extra"Mixed Zaatar It shall consist of at least 20% of raw zaatar or raw broadleaf zaatar mixed with: sesame seeds and sumac husk, with the possibility of adding grains, nuts, spices and condiments, as well as salt by ~~6%~~ 4% maximum.	**Jordan**

Text	Rationale
2.2.3 "Regular" Mixed Zaatar It shall consist of at least 15% of raw broadleaf zaatar or raw zaatar mixed with sesame seeds and sumac husk which should be added by at least 5%, in addition to the following possible ingredients: legumes, aromatic grains and herbs ~~,~~ spices, condiments (cumin…), pomegranate molasses, vegetable oil, nuts, wheat bran and sesame seed hull, provided they all meet the good manufacturing practices, with the possibility of adding salt by ~~7%~~ 4% maximum and citric acid by 4% maximum, provided they are indicated on the label.	**Jordan**
3. Essential composition and quality factors **3.1 Composition** **3.1.1 Basic Ingredients** dried zaater, sumac, and sesame seeds.	**Jordan**
3.1.2 Optional Ingredients: Salt	**Jordan**
3.2 Quality Factors **3.2.2 Chemical and physical characteristics** **3.2.2.1 Requirements and characteristics** **3.2.2.1.2 Chemical requirements - Table 1**	
Moisture % (m/m) maximum	
Premium Mixed Zaatar ~~12~~ – **10**	**Jordan**
Premium Mixed Zaatar ~~12~~ – **4**	
Extra Mixed Zaatar ~~12~~ - **10**	
Regular Mixed Zaatar ~~12~~ - **10**	
Total table salt % (m/m based on the dry matter) maximum	
Premium Mixed Zaatar ~~6~~ - **4**	**Jordan**
Extra Mixed Zaatar ~~6~~ - **4**	
Regular Mixed Zaatar ~~7~~ - **4**	
Malic acid/citris acid proportion, minimum	
Regular Mixed Zaatar ~~0.14~~ - **1**	**Jordan**