

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Items 4.4, 4.5, 4.7, 4.12, 11, 13

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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COMMENTS OF RUSSIAN FEDERATION

The Russian Federation requests to take into account the position presented in this document on some issues of the agenda of the 47th Session of the Codex Alimentarius Commission:

Agenda Item 4.4: Codex Committee on Contaminants in Foods

MLs for lead in spices, dried aril; dried seeds (including a separate ML for celery seeds); dried rhizomes and roots; dried floral parts; and spices, dried fruit and berries (including separate MLs for Sichuan pepper, star anise, paprika and sumac) for inclusion in the General standard for contaminants and toxins in food and feed (CXS 193-1995):

We do not support the adoption of the MRL for lead for spices: dried seeds (0.9 mg/kg), dried celery seeds (1.95 mg/kg), dried rhizomes and roots (2.0 mg/kg), dried flower parts (2.5 mg/kg), dried fruits and berries (0.6 mg/kg), Sichuan pepper (3.0 mg/kg), star anise (3.0 mg/kg), paprika and sumac (0.8 mg/kg).

Standardization of lead content in food products varies in different regions and countries. In particular, in the technical regulations of the Customs Union "On the safety of food products" (TR CU 021/2011), the uniform MRL for lead in spices, seasonings and herbs is 5 mg/kg. An assessment of the risk to public health from consumption of food products containing lead in accordance with the standards proposed by the Codex Alimentarius Commission showed that the establishment of more stringent standards may be an excessive measure and have an impact on international trade.

Agenda Item 4.5: Codex Committee on Food Additives

Food-additive provisions and revisions to adopted provisions (CXS 192-1995, GSFA):

We do not support the inclusion of dimethyl dicarbonate (INS 242) in categories 14.1.2 Fruit and vegetable juices and 14.1.3 Fruit and vegetable nectars. The use of INS 242 in these types of beverages results in the formation of significant quantities of methanol, which may cause adverse effects on the health of the consumer. We also do not support the inclusion of methacrylate copolymer (INS 1205) in categories 06.1 Whole, broken or flake grains, including rice, 11.1.1 White sugar, 11.1.2 Powdered sugar, dextrose powder and 11.2 Brown sugar, except for products of food category 11.1.3. In our opinion, there is no technological need for the use of this food additive in these food categories.

Agenda Item 4.7: Codex Committee on Pesticide Residues

MRLs for different combinations of pesticide/commodity(ies):

We would like to take a reserve. We do not support an increase in the fluopyram MRL (243) for the items GC 0640 Barley - 0.4 mg/kg and GC 0647 Oats - 0.4 mg/kg). The current Codex MRL (0.2 mg/kg) was approved in 2017 based on the median residue of the active substance obtained in controlled studies at 0.17 mg/kg. In this case, an increase in the Codex MRL is not scientifically justified.

Agenda Item 4.12: Codex Committee on Residues of Veterinary Drugs in Foods

Russia does not support the adoption of MRLs for clopidol residues (kidneys, liver, muscle tissue, and skin/fat of chickens), imidacloprid residues (fillets and/or muscle tissue of bony fish), lufenuron residues (fillets of bony fish), emamectin benzoate (muscle tissue and fillets of bony fish), and ivermectin residues (milk).

The Russian side cannot support the proposed MRLs due to the lack of data at the EAEU level. In addition, a review of the documents of the Joint FAO/WHO Expert Committee on Food Additives (JECFA) showed that JECFA used a simplified approach to assessing the risks of residues of these drugs without conducting

reproductive efficacy studies. We believe that the JECFA report can be supplemented with reproductive toxicity studies for the proposed MRLs of veterinary drugs. We believe that a decision on advancing the standard to the next step is possible only after the publication and discussion of these additions.

Agenda Item 11: Codex strategic plan 2026-2031

The text of the document distinguishes between a "strategic objective" and a "functional objective". This approach creates uncertainty.

Proposals for promoting the One Health approach within the framework of the Codex work have not been developed. This approach is interdisciplinary and not the only mechanism for eliminating risks associated with food safety, its use cannot play a decisive role in combating health threats. Attempts to impose a corresponding mechanism on countries duplicate the work within the Quad with other international organizations.

Agenda Item 13: Potential webcasting of the Executive Committee

Russia supports the organization of webcasts of the sessions of the Executive Committee of the Codex Alimentarius Commission. Coverage of the activities of the Executive Committee will increase the transparency of the work of the Committee, which acts on behalf of the Commission between meetings. This will allow for a better understanding of the recommendations of the Executive Committee. The meetings of other working bodies of the Codex are already broadcast on the Internet.