

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
FAO/WHO COORDINATING COMMITTEE FOR AFRICA

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Draft regional Standard for dried meat

Comments in reply to CL 2022/04/OCS-CCAFRICA

Comments of Malawi, Morocco, Nigeria, Somalia, South Africa, Uganda, Cuba, Egypt, India, and USA

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2022/04/OCS-CCAFRICA issued in April 2022. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

ANNEX 1

Text	Comment
General comment	
<p>The scope of this standard needs to be revised in order to become regional standard. Some animal meat species such as Donkeys and Horses are inedible to certain African communities.</p> <p>Animal slaughtering method should comply the Islamic law procedures to render the meat Halal.</p>	Somalia
SCOPE	
<p>The standard covers dried meat obtained from cattle, camel, sheep, goat, poultry, donkey, horse and farmed game intended for direct human consumption, [marketing] or for further processing.</p>	
<p>Cuba, agradece la oportunidad de enviar sus comentarios sobre la CL 2022/04/OCS-Africa, los cuales son</p> <p>En el proyecto de norma regional para la carne seca, son los siguientes:</p> <p>En 1. Ambito de aplicación, no somos del criterio de incluir en la carne seca a las aves de corral y las aves de caza.</p> <p>3.1.1 Carne magra cruda</p> <p>La carne cruda empleada para elaborar estos productos deberá proceder de un único tipo de carne y su sabor deberá ser característico de dicho tipo. Las materias primas a partir de las cuales se preparan los productos deberán ser inocuas aptas para el consumo humano. Quitar: . y estar libres de olores desagradables, cuerpos extraños, suciedad y signos de podredumbre.</p> <p>La carne cruda empleada para elaborar el producto deberá obtenerse de animales que hayan superado una inspección ante-mortem y post-mortem de una autoridad competente.</p> <p>En 6. Higiene, deben expresar RCP/CAC/ 58/2005 Código de Prácticas de Higiene para la Carne .</p>	Cuba
<p>The standard covers dried meat obtained from cattle, camel, sheep, goat, poultry, donkey, horse and farmed and wild game intended for direct human consumption, [marketing] or for further processing.</p>	Malawi
<p>Comment</p> <p>Poultry – is Ostrich included?, If not, please add ostrich</p> <p>Add pork</p> <p>Why is game limited to farmed? Responsible wild harvest must be included.</p>	South Africa
<p>The meat of the euidae (horse family) is not permitted for use in Egypt and many Islamic countries. Therefore, Egypt suggests that the text of the paragraph be as follows: “The standard covers dried meat obtained from animals- according to the each country legislations- intended for direct human consumption or for further processing”</p>	Egypt
<p>Remove word ‘marketing’</p> <p>Modify as follows:</p> <p>The standard covers dried meat obtained from cattle, camel, sheep, goat, poultry, donkey, horse and farmed game intended for direct human consumption, or for further processing</p> <p>Rationale:</p> <p>Marketing is one of the activity/unit of food business, that may not be appropriate to include in the scope</p>	India
<p>Comment:</p> <p>The text in square brackets i.e. [marketing] should be expunged.</p>	Nigeria

Text	Comment
Rationale: To align with other Codex texts. Perhaps, the 'marketing' of the product is still for human consumption or for further processing..	
<p>Need to rephrase the scope</p> <p>Justification: Editorial</p> <p>Marketing should be included in the scope,</p> <p>Justification:</p> <p>The product will end up in the market for consumer use</p> <p>The standard should remain as marketing tool</p> <p>Proposed change;</p> <p>The draft standard covers dried meat obtained from cattle, camel, sheep, goat, poultry, donkey, horse and farmed game intended for further processing and marketing for direct human consumption.</p>	Uganda
The standard covers dried meat obtained from <u>lean meat cuts prepared from</u> cattle, camel, sheep, goat, poultry, donkey, horse and farmed game intended for direct human consumption, [marketing] or for further processing.	Somalia
DESCRIPTION	
Dried meat products are a variety of dried, cured and/or smoked meat free from surface fat, bones, cartilage and tendons. They are typically made from raw meat which are cut into strips, and may be salted or spiced and then dried. The dried meat shall be clean, uniformly dried, cured, cooked and/or smoked and the product shall meet the requirements of this standard. This description does not include edible offal.	
Egypt proposes to add "heat" before "dried" because the Codex Standard CXS 92-1995 classified the dried meat to heated and non heated	Egypt
The document should clarify what is meant by "clean."	USA
<p>Need to rearrange the product process description</p> <p>Need to rename the clause to description and general requirements</p> <p>Justification:</p> <p>The clause contains provisions for general requirements</p>	Uganda
Include the techniques used in drying meat and remove cooking as a processing of drying meat.	Malawi
Delete the word strips from the sentence as the raw meat can also be in chunks or cut into pieces	Malawi
<p>Dried meat products are a variety of dried, cured and/or smoked meat free from surface fat, bones, cartilage and tendons. They are typically made from raw <u>lean</u> meat which are cut into strips, and may be salted or spiced and then dried. The dried meat shall be clean, uniformly dried, cured, cooked and/or smoked and the product shall meet the requirements of this standard. This description does not include edible offal.</p> <p>Comment</p> <p>what method of drying</p>	Somalia
3.1.1 Raw lean meat	
The document should include the fat content to clarify what is meant by "lean meat."	USA
<p>Raw lean meat</p> <p>Delete the word lean as not all dried meat products are made from raw lean meat</p>	Malawi

Text	Comment
The raw meat used for this processing shall be from one type of meat and its flavour shall be characteristic of that type. The raw materials from which the products are prepared shall be safe for human consumption and free from objectionable odours, foreign bodies, dirt and sign of rot.	Uganda
The raw meat used for processing the product shall be obtained from animals that have passed the ante-mortem and post-mortem inspection by a competent authority. <u>3.2 Optional ingredients These include curing agents consisting of food-grade salt, spices and condiments, and edible oil.</u>	Nigeria
The raw meat used for processing the product shall be obtained from animals that have passed the ante-mortem and post-mortem inspection <u>tests</u> by a competent authority.	Somalia
3.2- Essential 3 Quality Factors	Nigeria
<u>3.3.1</u> The ingredients shall be clean, of sound quality and fit for human consumption. They shall be handled in accordance with the latest edition of the Codex Alimentarius Codes of Hygienic Practice for the respective ingredients.	
The ingredients shall be clean, of sound quality and fit for human consumption. They shall be handled in accordance with the latest edition of the Codex Alimentarius Codes of Hygienic Practice for the respective ingredients. Comment Replace 'sound' with 'good' and delete the word " Codes of Hygienic Practice" and replace with 'standards' Delete the word 'latest edition of the' Justification:Need for clarity to the standards user Standards writing procedures	Uganda
3.2.1 Optional ingredients _	Nigeria
These include curing agents consisting of food grade salt, spices and condiments and edible oil.	
These include curing agents consisting of food grade salt, spices and spices, condiments and edible oil. Comment We recommend deleting the "and" in front of "condiments."	USA
These include curing agents consisting of food grade salt, spices and condiments and edible oil Comment Need to mention the applicable Codex standard as you cross reference to them.	Uganda
3.2.2 Quality Factors	Nigeria
<u>3.3.2</u> The dried meat shall comply with the requirements as given in Table 1.	
Characteristic Comment Table 1: The table should include the units for "edible salt" and "crude protein."	USA

Text		Comment	
Table 1 — Quality Requirements			
Characteristic	Limits for the final product		Nigeria
	Min	Max	
Moisture content (% m/m), <u>max</u>	40	{35} 30	
Water Activity (Aw), <u>max</u>	-	0.85	
Total Fat (% <u>m/m</u>), max	-	25	
Crude protein, (% <u>m/m</u>), <u>min</u>	20	48	
Edible Salt	-	13	
Ash Content (%)	-	{8} {14}	
<p>Moisture content (% m/m) <u>m/m</u> max</p> <p>Comment</p> <p>Moisture content should be a 'maximum' requirement rather than a range, in line with other Standards.</p> <p>In addition, moisture content for a category of products classified as dried meat (i.e Kilishi) in Nigeria can be as low as 5 – 8 %m/m</p> <p>However, a limit of 30 %m/m max is recommended to prevent quality deterioration (during storage) through enzymatic and microbiological spoilage, resulting to relatively reduction in short shelf life and consumer safety</p>			
Moisture content (% m/m), max [35]			
Moisture content (% m/m), max [35]		Morocco	
<p>Comment</p> <p>Après consultation avec les experts, le Maroc soutient cette valeur de 35%</p>			
<p>What is the justification of 8 and 14 as maximum limits terms of Science?</p> <p>Uganda proposes 8% for Total ash and 35% for moisture content</p> <p>Justification:</p> <p>FDEAS 1063: 2022, Dried meat – specification</p>		Uganda	
<p>Minimum values for the quality parameter, edible salt, is not provided but it is required</p> <p>Rationale:</p> <p>Minimum value is required in standards.</p>		India	
<p>Edible Salt - 13</p> <p>Comment</p> <p>Egypt proposes the salt is according to GMP , while it is related to the quality of the final product</p>		Egypt	
Ash Content (%) [8] [14]			
Egypt proposes the ash content shall be 14 % , while this percentage related to the percentage of protein 20-48 % and the percentage of salt 13 %		Egypt	
le Maroc maintient la valeur de 8 et suggère que le membre ayant proposé la nouvelle valeur de 14 est tenu de la justifier scientifiquement		Morocco	
FOOD ADDITIVES			
Antioxidants and preservatives used listed in accordance with the General Standard for Food Additives (CXS 192-1995) in <u>for</u> food category 08.2. "Processed meat,		Nigeria	

Text	Comment
poultry, and game products in whole pieces or cuts” are acceptable for use in foods conforming to this standard.	
Antioxidants and preservatives used in accordance with preservatives listed in the <i>General Standard for Food Additives</i> (CXS 192-1995) in food category 08.2. “Processed meat, poultry, and game products in whole pieces or cuts” are acceptable for use in foods conforming to this standard.	Nigeria
Antioxidants and preservatives used in accordance with preservatives listed in the <i>General Standard for Food Additives</i> (CXS 192-1995) in food category 08.2. “Processed meat, poultry, and game products in whole pieces or cuts” are acceptable for use in foods conforming to this standard.	Nigeria
Antioxidants and preservatives used in accordance with the <i>General Standard for Food Additives</i> (CXS 192-1995) in food category 08.2. “Processed meat, poultry, and game products in whole pieces or cuts” are acceptable for use in foods conforming to this standard.	
Delete the year of the cross referenced standard for food additives and rephrase according to standards writing rules	Uganda
<p>Les antioxydants antioxydants, conservateurs, régulateurs d'acidité, stabilisant et conservateurs séquestrant utilisés conformément à la <i>Norme générale pour les additifs alimentaires</i> (CXS 192-1995) dans la catégorie d'aliments 08.2 (Viande, volaille et gibier inclus, transformée, en pièces entières ou en morceaux) sont acceptables dans les aliments conformes à la présente norme.</p> <p>Comment</p> <p>les additifs alimentaires permis dans la catégorie d'aliments 08.2 de la norme générale pour les additifs alimentaires (CXS 192-1995) inclut également les régulateurs d'acidité, stabilisants, et séquestrant</p>	Morocco
<p>The flavourings used in products covered by this standard should comply with the <i>Guidelines for the Use of Flavourings</i> (CXG 66-2008).</p> <p>Comment</p> <p>Delete the year of the cross referenced standard for food additives and rephrase according to standards writing rules</p>	Uganda
<p>7.1 The products covered by this Standard shall comply with the maximum levels of the <i>General Standard for Contaminants and Toxins in Food and Feed</i> (CXS193-1995).</p> <p>Delete the year and rephrase the statement</p> <p>Justification: Standards writing procedures</p>	Uganda
CONTAMINANTS	
<p>7.2 The products covered by the provisions of this Standard shall comply with the <i>Maximum Residue Limits for Veterinary Drugs in Food</i> specified in (CXL 2-2015) and the maximum residue limits for pesticides set by the Codex Alimentarius Commission</p> <p>Comment</p> <p>Delete the year of the cross referenced standard for food additives and rephrase according to standards writing rules</p>	Uganda
<p>5.2 Les produits visés par les dispositions de la présente norme doivent respecter les <i>Limites maximales de résidus de médicaments vétérinaires dans les aliments</i> (CXL 2-2015) (CAC/MRL 2-2018) et les limites maximales de résidus de pesticides fixées par la Commission du Codex Alimentarius.</p> <p>Comments</p> <p>LIMITES MAXIMALES DE RÉSIDUS (LMR) ET RECOMMANDATIONS DE GESTION DES RISQUES (RGR) DES RÉSIDUS DES MÉDICAMENTS VÉTÉRINAIRES DANS LES ALIMENTS CAC/MRL 2-2018</p>	Morocco

Text	Comment
<p>It is recommended that the products covered by the provisions of this standard shall be prepared and handled in accordance with applicable sections of the <i>General Principles of Food Hygiene</i> (CXP 1-1969). The products should comply with any microbiological criteria established in accordance with the <i>Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods</i> (CXG 21-1997) and <i>Code of Hygienic Practice for Meat</i> (CXC 58-2005), the <i>Principles and Guidelines for the conduct of Microbiological Risk Management</i> (MRM) (CXG 63-2007) and <i>Code of Practice for Low-Moisture Foods</i> (CXC 75-2015).</p> <p>Comment</p> <p>Delete the years from the cross references</p> <p>Justification:- Standards writing procedures</p>	Uganda
HYGIENE	
<p>It is recommended that the products covered by the provisions of this standard shall be prepared and handled in accordance with applicable sections of the <i>General Principles of Food Hygiene</i> (CXP 1-1969). The products should comply with any microbiological criteria established in accordance with the <i>Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods</i> (CXG 21-1997) and <i>Code of Hygienic Practice for Meat</i> (CXC 58-2005), the <i>Principles and Guidelines for the conduct of Microbiological Risk Management</i> (MRM) (CXG 63-2007) and <i>Code of Practice for Low-Moisture Foods</i> (CXC 75-2015).</p> <p>Comment</p> <p>Delete the years from the cross references</p> <p>Justification: Standards writing procedures</p>	Uganda
<p>It is also recommended that animals should be slaughtered in accordance with the <i>Guidelines for the validation of food safety control measures</i> (CAC/GL 69 – 2008). <u>The Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011) and Guidelines for the Control of Nontyphoidal Salmonella spp. in Beef and Pork Meat (CXG 87-2016) where applicable should be followed during the drying process</u></p> <p>Comment</p> <p>this type of drying process has high risk with Salmonella if the lethality and drying are not done correctly. Minimizing Salmonella during slaughter can only help the issue.</p>	USA
<p>It is also recommended that animals should be slaughtered in accordance with the <i>Guidelines for the validation of food safety control measures</i> (CAC/GL 69 – 2008).</p> <p>Comment</p> <p>Delete the years from the cross references</p> <p>Justification:Standards writing procedures</p>	Uganda
7. PACKAGING AND LABELLING	
7.1 Labelling	
<p>The products covered by the provisions of this Standard shall be labelled in accordance with the <i>General Standard for the Labelling of Pre-packaged Foods</i> (CXS 1-1985). In addition, the following specific provisions apply:</p> <p>Delete the years from the cross references</p> <p>Justification - Standards writing procedures</p>	Uganda
<p>a) Name of the product shall state the type of meat used, as appropriate and the local/common name¹ . [Local name should be accompanied by the common name of the animal (e.g Segwapa- Goat)].</p>	
<p>Modify as: Name of the product shall be dried (type) meat and the local/common name .</p>	India

Text	Comment
a) Name of the product shall state the type of meat used, as appropriate and the local/common name ¹ – [Local name should be accompanied by the common name of the animal.] (e.g Segwapa- Goat).	Somalia
a) Name of the product shall state the type name of animal meat used, as appropriate and the local/common name ¹ . [Local name should be accompanied by the common name of the animal (e.g Segwapa- Goat)].	Somalia
Footnote [1] Some examples of local names for dried meat: Add the following name - Mukalo (Central Uganda)	Uganda
[b] L'étiquette doit comporter un dessin illustrant l'animal dont provient la viande de façon que le consommateur puisse facilement l'identifier.] Cette disposition n'est pas obligatoire conformément à la Norme générale Codex pour l'étiquetage des denrées alimentaires préemballées (CXS 1-1985) A cet effet, le Maroc suggère soit de supprimer cette disposition ou bien de remplacer « doit » par « peut »	Morocco
c) List of ingredients – the type of meat used shall be declared in the list of ingredients	
e) List of c) all ingredients – used in the preparation including the type of meat used shall be declared in the list of ingredients	Nigeria
c) List of ingredients – the type of <u>of</u> animal meat used shall be declared in the list of ingredients	Somalia
d) Best Before date. e) <u>Country of origin</u> It is a specific provision that should be included on the list in line with other Codex texts.	Nigeria
[7.2 Labelling of non-retail containers - The information required by this Standard and by Section 4 of the General Standard for the Labelling of Prepackaged Foods shall be given either on the container or in accompanying documents, except that the name of the product, the net weight of the product, date of manufacture, the production lot number as well as the name and address of the manufacturer, the packer, the distributor and/or importer shall appear on the container. However, lot identification, and the name and address of the manufacturer, packer, distributor, and/or importer may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents documents] Comment The text is relevant. Nigeria propose that the square brackets be removed.	Nigeria
[7.2 Labelling of non-retail containers - The information required by this Standard and by Section 4 of the General Standard for the Labelling of Prepackaged Foods shall be given either on the container or in accompanying documents, except that the name of the product, the net weight of the product, date of manufacture, the production lot number as well as the name and address of the manufacturer, the packer, the distributor and/or importer shall appear on the container. However, lot identification, and the name and address of the manufacturer, packer, distributor, and/or importer may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents]	
Comments and proposal Paragraph may be modified as: The labelling of Non Retail Container shall be in accordance with the General Standard for the Labelling of Non-Retail Containers of Foods (CXS 346-2021). Rationale: The information is already covered in the Codex document (CXS 346-2021).	India

Text	Comment
<p>[7.2 Étiquetage des emballages non destinés à la vente au détail – Les renseignements exigés par la présente norme et à la Section 4 de la Norme générale Codex pour l'étiquetage des denrées alimentaires préemballées doivent figurer sur le récipient ou dans les documents d'accompagnement, toutefois, le nom du produit, la masse nette du produit, la date de fabrication, l'identification du lot de même que le nom et l'adresse du fabricant, du conditionneur, du distributeur et/ou de l'importateur doivent figurer sur le récipient. Cependant, l'identification du lot, le nom et l'adresse du fabricant, du conditionneur, du distributeur et/ou de l'importateur peuvent être remplacés par une marque d'identification. <u>L'étiquetage des récipients non destinés à condition que cette marque puisse la vente au détail doit être clairement identifiée conforme à l'aide la norme générale sur l'étiquetage des documents d'accompagnement</u> récipients non destinés à la vente au détail.]</p> <p>Commentaire</p> <p>Selon l'amendement récent du Manuel de procédure (REP21/FL Annexe III, Section II page 52)</p>	Morocco
7.3 Packaging	
The product shall be packed in clean, hygienic, moisture-proof, and well-sealed containers food grade material made from suitable materials that have no adverse effect on product properties. It may also be vacuum packed.	
The product shall be packed in clean, hygienic, moisture-proof, and well-sealed containers <u>made from food grade material</u> made from suitable materials that have no adverse effect on product properties. It may also be vacuum packed.	Nigeria
<p>The product shall be packed in clean, hygienic, moisture-proof, and well-sealed containers food grade material <u>containers</u> made from suitable materials that have no adverse effect on product properties. It may also be vacuum packed.</p> <p>Comment</p> <p>Section 7.3 should be clarified as follows:</p> <p>The product shall be packed in clean, hygienic, moisture-proof, and well-sealed food grade containers food grade material made from suitable materials that have no adverse effect on product properties. It may also be vacuum packed.</p>	USA
This section says the product should be vacuum packaged but it doesn't provide for a handling instruction on storage of an opened package. If it is a single use package then fine, nothing more needed. But if it is a larger multi portion package then we should tell the consumer how to store the product once the vacuum seal has been broken which is typically refrigerate.	USA
<p>The product shall be packed in clean, hygienic, moisture-proof, and well-sealed containers food grade material made from suitable materials that have no adverse effect on product properties. It may also be vacuum packed.</p> <p>Comment</p> <p>Change packed to 'packaged'</p>	Uganda
The product shall be packed in <u>opaque</u> clean, hygienic, moisture-proof, and well-sealed containers food grade material made from suitable materials that have no adverse effect on product properties. It may also be vacuum packed.	Somalia
8. TRANSPORTATION AND STORAGE	
8.1 The transportation of the products shall be in accordance with the <i>Code of Hygiene Practice for the transport of food in bulk and semi-packed foods</i> (CAC/RCP 47-2001)	
Clause does not indicate any requirements on the storage of dried meat	Malawi
<p>Delete the year</p> <p>Justification:Standards writing procedures</p>	Uganda

Text	Comment
8.2 [Transport of slaughter animals should be carried out in a manner that does not have an adverse impact on the safety and suitability of meat and shall be in accordance of the Code of <i>Hygienic Practice for Meat</i> (CXC 58-2005)]	
<p>8.2 [Transport of slaughter animals should be carried out in a manner that does not have an adverse impact on the safety and suitability of meat and shall be in accordance of the Code of <i>Hygienic Practice for Meat</i> (CXC 58-2005)]</p> <p>Standard should remain focused on the transportation of the final product (dried meat) here, rather than the animals. The referenced Code is relevant, but has already been handled/ referenced under Clause 6 Hygiene.</p>	Nigeria
Delete the clause, reference a code of transport for final product, already captured in 8.1	Uganda
9 METHODS OF ANALYSIS AND SAMPLING	
9.1 METHODS OF ANALYSIS	
<p><i>Determination of water activity</i></p> <p>Egypt propose to add new method as follows :</p> <p>A.O.A.C 924.08 - Determination of crude protein</p>	Egypt
<p><i>Determination of water activity</i></p> <p>Identification of meat species and meat products by PCR assay or ELISA method for meat species identification.</p>	Somalia
9.1 Sampling	
<p>9.2 Sampling</p> <p>Sampling shall be in accordance with the Codex General Guidelines on Sampling (CAC/GL 50-2004)50-2004)</p>	Nigeria
<p>Sampling shall be in accordance with the Codex General Guidelines on Sampling (CAC/GL 50-2004)]</p> <p>Delete the year</p> <p>Justification: Standards writing procedures</p>	Uganda