

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 2, 3.1, 4 and 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME FAO/WHO COORDINATING COMMITTEE FOR THE NEAR EAST

Eleventh Session

Rome, Italy, FAO Headquarters

18 - 22 September 2023

Comments submitted by Egypt

Agenda Item 2: Keynote address: “Transformation of Food Systems for Sustainable Food for Better Health”

Egypt thanks CCNE Coordinator and the Regional Coordinator and the FAO and WHO Regional Offices for preparing this document. As the urgent need for reshaping the food systems at a national level in a face of the rising burden of non-communicable diseases worldwide from both the public health and economic perspectives and as we strive towards accelerating the achievement of the Sustainable Development Goals by 2030 has become evident as per the WHO direction, Egypt aims to protect the consumer's health by setting up national food regulation and standards:

- Egypt addresses a technical regulation for special foods that can contribute to the prevention of nutritional deficiencies and diet-related non-communicable diseases including Food Labelling (CCFL) sets standards and guidelines for nutrition information on food packages enabling consumers to make informed food choices in alignment with Codex direction.
- On other hand Egypt tackles the Metabolic risk factors that increase the risk of NCDs mainly hyperlipidemia (high levels of fat in the blood), we adopt the direction to decrease the fatty acids especially trans one by:
- Issuing technical regulations to specify the maximum limits of Trans Fatty Acids (TFA) in food.
- Another decree is issued discussing the mechanism of dealing with oils, fats and food greases used in food production.
- A lot of other efforts done different initiatives and programs to tackle the Metabolic risk factors: raised blood pressure; overweight/obesity; hyperglycemia (high blood glucose levels); and hyperlipidemia (high levels of fat in the blood) in a harmony between legislative food bodies and ministry of health.
- In the same approach, Egypt launches One Health National Strategic Framework 2023-2027, as a joint roadmap for One Health in cooperation with the World Health Organization (WHO) in Egypt and the United Nations Food and Agriculture Organization (FAO) in Egypt. The One Health approach recognizes the close connection between human, animal and environmental health, and aims for joint action between these sectors to achieve better health outcomes that can effectively contribute to preventing, predicting and responding to global health threats such as the COVID-19 pandemic.

Agenda Item 3.1: Alignment of the Food Additive provisions of Regional Standards and relevant provisions of the GSFA

Egypt appreciates the work done by the EWG led by Saudi Arabia for preparing this document. And suggest the following modifications.

Item 3.4: Tehena (CXS 259R-2007)

Reviewing and update of the group item in the General Standard for Food Additives (CODEX STAN 192-1995) that cover the specification of **Tehena** as a “product obtained by grinding mature, roasted and husked

sesame seeds of the species *Sesame indicum* L.”, so that Tehena manufactured from sesame seeds is not part of group 04.2.2.6 but a type of prepared foods

Also reviewing and update the group item which meet the specification of **Halawa Tehnia** as a “product designates a heat-processed food product made of tahina, natural sugars and other ingredients with the composition provided for in Section 3. Its texture is consistent or crumbly (Fibrous Halwa).”

So that, It will be better to consider Halawa Tehnia as Prepared food more than soft candy.

Also to establish a new sub group in CXS 192 to cover the nature and specialty of the regional products as follow:

PART I: Food Category System:

16. Prepared foods

16.1 Tehena

16.1.1 Halawa Tehenia

PART II: Food Category Descriptors

16.1 Tehena

Tehena is a product obtained by grinding mature, roasted and husked sesame seeds of the species *Sesame indicum* L.

16.1.1 Halawa Tehenia

‘Halwa Tehenia’ designates a heat-processed food product made of tahina, natural sugars and other ingredients with the composition provided for in Section 3. Its texture is consistent or crumbly (Fibrous Halwa).

ANNEX TO TABLE THREE

Food Categories or Individual Food Items Excluded from the General Conditions of Table Three

The use of additives listed in Table Three in the following foods is governed by the provisions in Tables One and Two.

16.1	Tehena (CXS 259R-2007)
	No food additives are permitted in Tehena” in the commodity standard, and request CCFA to make changes to GSFA to reflect this.
References to Commodity Standards for GSFA Table 3 Additives²	
16.1.1	Halawa Tehenia (CXS 309R-2011)
	Only acidity regulators and emulsifiers listed in Table 3 of the General Standard for Food Additives (CODEX STAN 192-1995) are acceptable for use in foods conforming to this Standard.

Agenda Item 4: Proposed Draft Standard on Maamoul

Egypt appreciates the work done in the document, and suggests the following:

- 1- Postponing the adoption of Proposed Draft Standard on Maamoul (at Step 3) due to the draft of standard need more study to add new criteria related to product safety & quality also to protect the consumer from food fraud such as: The acidity of the extracted fat - total ash & acid insoluble ash - moisture content - fat content - etc.
- 2- Adding new clauses as follows:
 - Clause no. 3.1.1.6: Raising Materials: Baking powder, active baking yeast and any permitted raising materials in accordance with CXG 192.
 - Clause no. 3.1.1.7: Dough Improvers: proteolytic enzyme, amylase enzyme...etc. and any permitted dough improvers in accordance with CXG 192.

– Clause no. 9: METHODS OF SAMPLING AND ANALYSIS

For checking the compliance with this standard, the methods of analysis and sampling contained in the Recommended Methods of Analysis and Sampling (CXS 234-1999) relevant to the provisions in this standard, shall be used.

- 3- In addition to the previous comments, taking into consideration the editorial comments which were entered on OCS.

Agenda item 6: Codex work relevant to the region

Egypt would like to thank the Coordinator of CCNE for the good work which done in this document and in light of what was approved by the CCNE10 regarding the codex work relevant to the region, and the recommendations contained in this document regarding the following:

1- Consider the above information and discuss the issues as proposed;

Regarding the item 3.2 ongoing standard setting work of relevance to the region

Table 1: Non-exhaustive list of ongoing Codex work of special interest to CCNE

A. CCFFV - Proposed draft standard for fresh dates.

Now, The Work is going on through the Arab Codex Initiative of the Global Food Regulatory Society (GFORss), with the participation of a group of Arab countries, including Egypt, in the EWG concerned with collecting and analyzing data on the percentage of moisture in fresh dates in the Arab region.

B. CCFO - discussion paper to address the possible work that CCFO could undertake to reduce TFAs or eliminate PHOs.

Egypt replied to the discussion paper submitted by the CCFO, regarding the work that can be provided to reduce (TFAs) or eliminate PHOs, and presented its proposals regarding adding some definitions and some items to the standards of oils and fats. (Egypt's comments is attached)

2- Consider if the matters identified at CCNE10 are still relevant and provide further information accordingly;

A. CCPR - Priority lists of pesticides for evaluation/re-evaluation by JMPR

Egypt replied to the document no. CL2023/26-PR regarding Request for comments on the establishment of Codex schedules and priority lists of pesticides for evaluation / re-evaluation by JMPR , by approving the proposed priorities with some recommendations , through the working group that was established in this concern by CCPR (Egypt's comments are available [here](#)).

B. CCRVDF- Priority list of veterinary drugs for evaluation/re-evaluation by JECFA

Egypt has previously submitted a list of veterinary drug residues in camels (milk and tissues). It is also participated in the EWG proposed by the CCRVDF, which is concerned with extrapolation of MRLs for residues of veterinary drugs in offal tissues, where Egypt supported the necessity for further discussions during the CCRVDF26 on how to extrapolate MRLs for residues in edible offal tissues other than kidney and liver.

3- Prioritize the issues of greatest interest to the region and consider means to ensure the views of the region are transmitted in the related discussions

- a. Egypt proposes that the MLs of aflatoxins in peanuts are a priority for the countries of the CCNE. In this concern, Egypt is chaired and the Republic of Sudan is co-chaired of EWG that emanating from the Arab Codex Initiative, with partnership of some Arab countries of common interest in the same issue, to coordinate to prepare a unified Arab position on the borders Maximum levels of aflatoxins in peanuts for direct consumption. This position will prepare based on data and principles of risk analysis, to establish an international standard for the MLs of aflatoxins in peanuts ready for direct consumption in Arab countries.
- b. Supporting the developing of standards for products that help introduce and promote food and agricultural materials specific to the region, in order to contribute to their definition, support proper production methods for them, and also support their entry into regional and international markets.

Egypt comments on the Draft discussion paper and project document on possible CCFO work related to reducing Trans Fatty Acids

Egypt suggests adding the following points:

1- The following definitions:

“Saturated Fatty Acids” shall mean fatty acids in which all the carbon atoms are saturated with hydrogen, and the general formula is $\text{CH}_3(\text{CH}_2)_n\text{COOH}$, when n is between 2 and 10, the fatty acid is a short-chain fatty acid, and when n is greater than 11, the fatty acid is a long-chain fatty acid.

“Unsaturated Fatty Acids” shall mean fatty acids containing at least one double bond between two carbon atoms.

“Trans Fatty Acids” shall mean unsaturated fatty acids that have been partially or fully hydrogenated to convert from a liquid to a semi-solid state.

“Partially Hydrogenated Oils” shall mean fats and oils that have been hydrogenated, but not fully hydrogenated, i.e. have not reached full saturation, provided that the iodine number value is greater than 4 grams of iodine / 100 grams of oil or fat.

“Fully Hydrogenated Oils” shall mean the result of the full hydrogenation of one or more vegetable oils suitable for human consumption to convert them from a liquid state to a semi-solid state for use in the food industries so that the iodine number has a value of 4 grams of iodine/100 grams or less of oil or fat.

“Iodine Number” shall mean the amount of iodine absorbed in grams/100 grams of oil or fat, and the iodine number is used as a measure of the level of unsaturation.

2- It should add the following items to all oils standards:

- FBOs shall be prohibited to use partial hydrogenation or to handle or use partially hydrogenated oils and fats in food processing.
- FBOs shall comply with the following requirements and conditions:
 - a. The content of saturated fat and the percentage of trans fatty acids shall be written on the label of food products containing oils and vegetable fats.
 - b. The maximum limits for industrial trans fatty acids present in food, other than the fatty acids naturally present in fats of animal origin, whether for direct final consumption, as a production input, or for indirect consumption provided that such industrial trans fatty acids do not exceed 2 grams/100 grams of oils and fats in food prepared for the final consumer and food prepared for retail.
 - c. Suppliers who supplied quantities not intended for the final consumer to other FBOs shall provide information on the amount of trans fatty acids other than the trans fatty acids that are naturally present in fats of animal origin, as the amount of trans fatty acids may not exceed 2 grams/100 grams of oil or fat.