



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FATS AND OILS

Twenty-Eighth Session

Kuala Lumpur, Malaysia

19-23 February 2024

REVIEW OF THE *LIST OF ACCEPTABLE PREVIOUS CARGOES* (APPENDIX II TO CXC 36-1987)

(Comments of Burundi, Ghana, Peru, Russian Federation, United Arab Emirates, United Republic of Tanzania and FOSFA)

Burundi

General comment: Burundi thanks the Electronic Working Group chaired by Malaysia for their good work and supports the work and recommendations of the EWG that CCFO28 considers and adopts the recommendations.

Ghana

Position: Ghana has no objection to the EWG recommendations.

Peru

POSICIÓN PAÍS PERÚ

Nombre de la Comisión Técnica Nacional: Comisión Técnica Nacional sobre grasas y aceites

Nombre del documento en consulta: CL 2023/63/OCS-FO Solicitud de observaciones sobre la propuesta de examen de la Lista de cargas anteriores aceptables (CXS 36-1987, Apéndice 2)

Plazo para remitir respuesta a la Secretaría: 12 de enero de 2024

Plazo para remitir al Pleno: 19 de enero de 2024

Plazo Codex internacional: 19 de enero de 2024

Comentario General:

Perú agradece el trabajo realizado por el grupo de trabajo electrónico [GTE] presidido por Malasia y las recomendaciones contenidas en el CX/FO 24/28/10.

Comentarios Específicos:

- Perú ha tomado nota de que las sustancias propuestas, o sea, bebidas alcohólicas y no alcohólicas, productos lácteos, glucosa y lecitina, se consideran alimentos y, por lo tanto, no es necesario incluirlas en la Lista de cargas anteriores aceptables, según la Sección 2.1.3, Notas (1) y el Criterio 3 del Apéndice 2 del documento CXC 36-1987: Lista de cargas anteriores aceptables.
- Perú ha examinado las recomendaciones y concluimos en:
 - Perú está de acuerdo en no considerar la inclusión de las cinco sustancias nuevas, esto es, solución de sulfato de amonio, ciclohexagenol, ciclohexanona, yodo del vino y urea, propuestas en el Apéndice 2 de la Lista de cargas anteriores aceptables hasta que no se proporcione la información pertinente al Comité.
 - Perú esta de acuerdo con asignar los números CAS a las sustancias siguientes:
 - Fructosa: 57-48-7

- b) Peróxido de hidrógeno: 7722-84-1
- c) Solución de nitrato amónico de urea (UAN): 15978-77-5

Russian Federation

The Russian Federation considers it appropriate:

- not to include alcoholic and nonalcoholic beverages, dairy products, glucose and lecithin in the List of Acceptable Previous Cargoes, because they are foodstuffs.
- to provide adequate and relevant information on the ammonium sulfate solution, wine iodines and urea before their inclusion in Appendix 2: List of Acceptable Previous Cargoes. Not to include cyclohexanol and cyclohexanone in Annex 2 due to their genotoxic and carcinogenic potential.
- to support the inclusion of fructose, hydrogen peroxide and urea ammonium nitrate solution in Appendix 2.

United Arab Emirates

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The proposed substances, (Namely drinks, alcoholic and non-alcoholic, dairy products, glucose, and lecithin) are regarded as foodstuffs and thus, do not need to be included in the List of Acceptable Previous Cargoes in relation to Section 2.1.3, Notes (1) and Criterion 3 of Appendix 2: List of Acceptable Previous Cargoes of CXC 36-1987.

- Cargoes not included in the list are only acceptable if they are agreed upon by the competent authorities of the importing country.

United Republic of Tanzania

General comment: Tanzania thanks the Electronic Working Group chaired by Malaysia for their good work. Tanzania supports the work and recommendations of the EWG that CCFO28 considers and adopts the recommendations.

FOSFA

FOSFA International would like to thank Malaysia for preparing the report on the Review of the list of acceptable previous cargoes on fats and oils - CXC 36-1987, Appendix 2 (CX/FO 24/28/10).

The two lists CODEX ALIMENTARIUS LIST OF ACCEPTABLE PREVIOUS CARGOES (Appendix 2) and the CODEX ALIMENTARIUS LIST OF BANNED IMMEDIATE PREVIOUS CARGOES (Appendix 3) are separate and independent from each other, and therefore, information for both lists should be as clear as possible for users to understand the requirements for each list individually. Users may not take the requirements for the CODEX ALIMENTARIUS LIST OF BANNED IMMEDIATE PREVIOUS CARGOES (Appendix 3) into account when they use the CODEX ALIMENTARIUS LIST OF ACCEPTABLE PREVIOUS CARGOES (Appendix 2).

Consequently, information on restrictions beyond the immediate previous cargoes must be made clear for both lists individually.

1. Although this topic had been discussed at the previous CCFO27 meeting, it is important to further clarify and elaborate. Leaded products are extremely toxic and persistent and are not permitted as an immediate previous cargo for both the LIST OF BANNED IMMEDIATE PREVIOUS CARGOES as well as the LIST OF ACCEPTABLE IMMEDIATE PREVIOUS CARGOES. However, currently the restrictions for leaded products beyond the immediate previous cargo to the 2nd and 3rd previous cargoes are only listed in the LIST OF BANNED IMMEDIATE PREVIOUS CARGOES as seen in the entry in the table in Appendix 3:

“Leaded products (shall not be carried as three previous cargoes)”.

Although according to the LIST OF ACCEPTABLE IMMEDIATE PREVIOUS CARGOES leaded products cannot be carried as the first immediate cargo, no mention is made in Appendix 2 that leaded products shall not be carried as the 2nd and 3rd immediate previous cargoes.

Relying on the entry in Appendix 3 on the restriction of leaded products for the 2nd and 3rd previous cargo to apply to Appendix 2 is unsafe and can easily be overlooked when the user will be considering Appendix 2.

Hence, the Committee is asked to consider the following recommendation:

To include under the “Notes” for Appendix 2 that reads:

“Leaded products shall not be carried as the 2nd and 3rd previous cargoes”.

2. In addition, as reflected in the footnote in Appendix 3 CODEX ALIMENTARIUS LIST OF BANNED IMMEDIATE PREVIOUS CARGOES, Ethylene dichloride (EDC; 1,2-dichloroethane; ethylene chloride) and Styrene monomer (SM) (vinyl benzene; phenyl ethylene; cinnamene) are banned as 1st and 2nd previous cargoes in organic coated tanks:

“Banned as any one of the last two cargoes in organically coated tanks and as the last cargo in stainless steel and inorganically coated tanks”.

EDC and SM are also extremely toxic and persistent, and our experience at FOSFA International has demonstrated that these two substances are readily absorbed into the coating of organic coated tanks and traces of these two substances can be detected in up to the third cargo (and sometimes beyond) carried after EDC or SM have been carried in organic coated tanks.

Therefore, the Committee is requested to consider the following recommendations:

- an entry is included under the “Notes” for Appendix 2 that reads:

“Ethylene Dichloride and Styrene Monomer shall not be carried as the 2nd and 3rd previous cargoes in organic coated tanks”.
 - the footnote in Appendix 3 should be amended to clarify that the restrictions for SM and EDC applies up to the 3rd previous cargo:

“Banned as the three previous cargoes in organically coated tanks and as the last cargo in stainless steel and inorganically coated tanks”.
3. A correction in a link in the Bibliography (Appendix 4) is needed. The link in the reference to “*Federation of Oils, Seeds and Fats Associations (FOSFA International). 2021. In: FOSFA. London. FOSFA International List of Banned Immediate Previous Cargoes. [NOVEMBER 1999 \(fosfa.org\)](#)” takes the user to the FOSFA List of Acceptable Previous cargoes instead of the List of Banned Immediate Previous Cargoes. The link should be corrected, or the text should be changed. Preferably links to both lists should be included.*

The Committee is asked to consider the following correction and update:

Federation of Oils, Seeds and Fats Associations (FOSFA International). In: FOSFA. London. FOSFA International List of Banned Immediate Previous Cargoes & FOSFA International List of Acceptable Immediate Previous Cargoes. [Carriage Of Oils And Fats | FOSFA International](#)