

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 2

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON SPICES AND CULINARY HERBS

Second Session

Goa, India, 14 – 18 September 2015

MATTERS REFERRED BY THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES

Comments of India

A. MATTERS ARISING FROM THE 37TH AND 38TH SESSIONS OF THE CODEX ALIMENTARIUS COMMISSION

MATTERS FOR ACTION

Codex Strategic Plan 2014 – 2019

The Committee would like to submit the following replies to the activities of relevance of the Codex Strategic Plan:

Strategic Goal	Objective	Activity	Expected Outcome	Measurable Indicators/Outputs
1: Establish international food standards that address current and emerging food issues.	1.1: Establish new and review existing Codex standards based on priorities of the CAC	1.1.1: Consistently apply decision-making and priority-setting criteria across Committees to ensure that the standards and work areas of highest priority are progressed in a timely manner.	New or updated standards are developed in a timely manner.	- Priority setting criteria are reviewed, revised as required and applied. - # of standards revised and # of new standards developed based on these criteria.
<p>Question to the Committee: Is this activity relevant to the work of the Committee? YES Does the Committee use any specific criteria for standards development? CCSCH uses the “Criteria for the Establishment of Work Priorities” and “Format for Codex Commodity Standards” as per the Codex Procedural Manual. In its work on development of Standards for spices and Culinary herbs, the Committee prioritizes the new work proposals based on the criteria mentioned in the Procedural Manual. Does the Committee intend to develop such criteria? No as of now. In the first session of the CCSCH, it was decided that there is no need for any specific criteria for CCSCH other than the one provided for in the Codex Procedural Manual.</p>				
	1.2: Proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.	1.2.1: Develop a systematic approach to promote identification of emerging issues related to food safety, nutrition, and fair practices in the food trade.	Timely Codex response to emerging issues and to the needs of Members.	- Committees implement systematic approaches for identification of emerging issues. - Regular reports on systematic approach and emerging issues made to the CCEXEC through the Codex

<p>Question to the Committee: Is this activity relevant to the work of the Committee? YES How does the Committee identify emerging issues and members needs? The Members submit the new work proposals including the emerging issues related to spices and herbs. In addition, other committees or FAO/WHO could refer any emerging issues to the Committee. Is there a systematic approach? Is it necessary to develop such an approach? Currently, there is no systematic approach, however, there may be a need to develop one should the current process be found insufficient.</p>				
		1.2.2: Develop and revise international and regional standards as needed, in response to needs identified by Members and in response to factors that affect food safety, nutrition and fair practices in the food trade.	Improved ability of Codex to develop standards relevant to the needs of its Members.	- Input from committees identifying and prioritizing needs of Members. - Report to CCEXEC from committees on how standards developed address the needs of the Members as part of critical review process.
<p>Included in question to 1.2.</p>				
2: Ensure the application of risk analysis principles in the development of Codex standards.	2.1: Ensure consistent use of risk analysis principles and scientific advice.	2.1.1: Use the scientific advice of the joint FAO/WHO expert bodies to the fullest extent possible in food safety and nutrition standards development based on the "Working Principles of Risk Analysis for Application in the Framework of the Codex Alimentarius".	Scientific advice consistently taken into account by all relevant committees during the standard setting process.	- # of times the need for scientific advice is: identified, requested and, utilized in a timely manner.
<p>Question to the Committee: Is this activity relevant to the work of the Committee? YES Does the committee request scientific advice in course of its work, how often does it request such advice? Does the committee always use the scientific advice, if not, why not? CCSCH is a newly established Committee and has initiated the process of developing standards based on the proposals made by the members. It has not utilized the scientific advice from FAO/WHO Expert Bodies to-date. However, as and when the work of the Committee increases and wherever required scientific advice will be requested for.</p>				
		2.1.2: Encourage engagement of scientific and technical expertise of Members and their representatives in the development of Codex standards.	Increase in scientific and technical experts at the national level contributing to the development of Codex standards.	- # of scientists and technical experts as part of Member delegations. - # of scientists and technical experts providing appropriate input to country positions
<p>Question to the Committee: Is this activity relevant to the work of the Committee? YES How do members make sure that the necessary scientific input is given into country positions and that the composition of the national delegation allows to adequately present and discuss this position? What guidance could be given by the Committee or FAO and WHO? The Members are encouraged to involve their technical and scientific experts when submitting a new work proposals, reviewing the agenda and while submitting their comments in the working Groups.</p>				

		2.1.3: Ensure that all relevant factors are fully considered in exploring risk management options in the context of Codex standard development.	Enhanced identification, and documentation of all relevant factors considered by committees during the development of Codex standards.	- # of committee documents identifying all relevant factors guiding risk management recommendations. - # of committee documents clearly reflecting how those relevant factors were considered in the context of standards
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Question to the Committee:

Is this activity relevant to the work of the Committee? **Yes**

How does the Committee ensure that all relevant factors have been taken into account when developing a standard and how are these documented? **The Committee has begun the process of standard setting and the principles of risk analysis as laid down in the Codex Procedural Manual will be applied.**

		2.1.4: Communicate the risk management recommendations to all interested parties.	Risk management recommendations are effectively communicated and disseminated to all interested parties.	- # of web publication/communications relaying Codex standards. - # of media releases disseminating Codex standards.
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Question to the Committee:

Is this activity relevant to the work of the Committee? **Yes**

When taking a risk management decision, does the committee give guidance to members how to communicate this decision? Would more consideration of this be helpful to members? **The Committee has begun the process of standard setting and once they are adopted, they will be published as per the laid down procedure including publication on Codex website.**

Strategic Goal	Objective	Activity	Expected Outcome	Measurable Indicators/Outputs
3: Facilitate the effective participation of all Codex Members.	3.1: Increase the effective participation of developing countries in Codex.	3.1.5: To the extent possible, promote the use of the official languages of the Commission in committees and working groups.	Active participation of Members in committees and working groups.	- Report on number of committees and working groups using the languages of the Commission

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Is the use of official languages in working groups of the committee sufficient? **Development of standards has just started and it is may not be possible to assess the use of official languages in working groups.**

What are the factors determining the choice of languages? How could the situation be improved? **The Committee determines the choice of language based primarily on the availability of resources and on the host of the working group. The Committee mainly uses English for electronic working groups, but has used Spanish as well when resources allowed.**

	3.2: Promote capacity development programs that assist countries in creating sustainable national Codex structures.	3.2.3: Where practical, the use of Codex meetings as a forum to effectively conduct educational and technical capacity building activities.	Enhancement of the opportunities to conduct concurrent activities to maximize use of the resources of Codex and Members.	- # of activities hosted on the margins of Codex meetings.
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Question to the Committee:
 Is this activity relevant to the work of the Committee? **YES**
 Does the Committee organize technical capacity activities or other activities in the margins of Committee sessions? If yes
 – how many and with which topics have been organized in the past? If no – could this be useful and what topics could be addressed? **Workshops are conducted for the first -time delegates on the sidelines of committee meetings. The Committee can definitely look for options to conduct capacity development programs in the future.**

4: Implement effective and efficient work management systems and practices.	4.1: Strive for an effective, efficient, transparent, and consensus based standard setting process.	4.1.4: Ensure timely distribution of all Codex working documents in the working languages of the Committee/Commission.	Codex documents distributed in a more timely manner consistent with timelines in the Procedural Manual.	- Baseline Ratio (%) established for documents distributed at least 2 months prior to versus less than 2 months prior to a scheduled meeting. - Factors that potentially delay the circulation of documents identified and addressed. - An increase in the ratio (%) of documents circulated 2 months or more prior to meetings.
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Question to the Committee:
 Is this activity relevant to the work of the Committee? **YES**
 Does the Committee have a mechanism in place to ensure timely distribution of documents? What could be done to further improve the situation? **The Committee Secretariat and the National Codex Contact Point in close coordination with the Codex Secretariat follow up work on the work of the electronic working groups and timely distribution of documents.**

Strategic Goal	Objective	Activity	Expected Outcome	Measurable Indicators/Outputs
		4.1.5: Increase the scheduling of Work Group meetings in conjunction with Committee meetings.	Improved efficiency in use of resources by Codex committees and Members	- # of physical working group meetings in conjunction with committee meetings, where appropriate.

Question to the Committee:
 Is this activity relevant to the work of the Committee? **YES**
 Does the Committee hold physical working groups independent of Committee sessions? If yes – why is this necessary? **NO. The Committee agreed to schedule an In Session Working Group at its first session to review all the new work proposals and establish priorities.**

	<p>4.2: Enhance capacity to arrive at consensus in standards setting process.</p>	<p>4.2.1: Improve the understanding of Codex Members and delegates of the importance of and approach to consensus building of Codex work.</p>	<p>Members and delegates awareness of the importance of consensus in the Codex standard setting process improved.</p>	<ul style="list-style-type: none"> - Training material on guidance to achieve consensus developed and made available in the languages of the Commission to delegates. - Regular dissemination of existing material to Members through Codex Contact Points. - Delegate training programs held in association with Codex meetings. - Impediments to consensus being achieved in Codex identified and analyzed and additional guidance developed to address such impediments, if necessary.
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Question to the Committee:
 Is this activity relevant to the work of the Committee? **YES**
 Are there problems with finding consensus in the Committee? If yes – what are the impediments to consensus? What has been attempted and what more could be done? **The Committee has not faced such a situation yet. However, it is expected that the Committee may at times experience difficulties in finding consensus when developing standards and obtaining agreement on new work. Therefore, it has been decided an in-session working group would be established for each session to prioritise the proposals for new work.**

B. MATTERS ARISING FROM OTHER CODEX COMMITTEES AS RELATED TO THE WORK OF CCSCH MATTERS FOR ACTION

70th Session of the Executive Committee (CCEXEC70)

It is observed that CCFH had adopted a process by which the Committee will undertake its work, process for prioritizing new work proposals (including the review of Codes of Hygienic Practice and previous proposals for new work not yet acted upon) giving weightage to Public Health risk, impact of trade on the public health risk, current information available, duplication of or inconsistency with existing Codes and revision of Codes more than five years since implementation, last review and/or last consideration by the Committee.

The CCSCH in its first session deliberated on a discussion paper prepared by a member, where a similar attempt was made to develop multi-criteria for prioritization of new work proposals for CCSCH, giving weightage to certain criteria, however, the Committee considered it not necessary to develop specific criteria for prioritizing their work. It was also noted that the proposed multi-criteria ranking system needed further elaboration and that it would be difficult to reach consensus on the score assigned to each criterion. The Committee decided to consider prioritization of the new work proposals as per the Procedural Manual (REP14/SCH paragraph 45-49).

However, since the CCSCH is in its initial stage of setting standards, as the work increases, in future it may consider/re-consider developing procedure by which the Committee will undertake its work and process for prioritizing new work proposals.

47th Session of the Committee on Food Additives (CCFA47)

The CCFA47 asked CCSCH to clarify whether the following uses were technologically justified:

- The general use of antioxidants in herbs and the specific use of ascorbic acid, L- (INS 300) and sodium ascorbate (INS 301) in herbs (as antioxidants); and
- The general use of anticaking agents and the specific use of silicon dioxide amorphous (INS 551) and sodium carbonate (INS 500(i)) in herbs (as anticaking agents).

It is observed that, Ascorbic acid- L (INS 300, Synonym-Vitamin C) is having antioxidant property in addition

to acidity regulator and is added to foodstuffs during processing or before packing to protect color, aroma and nutrient content.

Sodium Ascorbate (INS 301) is a sodium salt of Ascorbic Acid, widely used as antioxidant in food and beverage industries.

Silicon dioxide amorphous (INS 551) is used as an anticaking agent in powdered mixes, seasonings and coffee whiteners.

Sodium carbonate (INS 500(i), synonym- soda ash) is also used as anticaking agent and acidity regulator in seasonings and condiments.

As per Codex GSFA, Ascorbic acid- L, Sodium Ascorbate, Silicon dioxide amorphous and Sodium carbonate are food additives that are included in Table 3 of the GSFA and may be used in certain category of foods under the condition of Good Manufacturing Practices (GMP) as outlined in the Preamble of the Codex GSFA. Although not listed, the above additives could be used in heat-treated butter milk of food category 01.1.1 and **spices of food category 12.2.1.**

Further it is noted that JECFA evaluations of the above additives shows Acceptable Daily Intake (ADI) as “not specified”.

However, the CCSCH is relatively new and therefore has not gained adequate experience on the use of food additives in its standard setting work, hence this matter may require a case by case approach, i.e. a specific food additive in a kind of specific herb.