

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 2, 4.5, 4.8, and 4.9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-fifth Session

FAO Headquarters, Rome, Italy

21-25 November and 12-13 December 2022

Comments from Uganda

Agenda Item 2: Report by the Chairperson on the 82nd and 83rd Sessions of the Executive Committee

CCEXEC SUBCOMMITTEE ON THE APPLICATION OF THE STATEMENT OF PRINCIPLES (SoP) CONCERNING THE ROLE OF SCIENCE

Uganda appreciates the work done by the CCEXEC Subcommittee on the application of the statement of principles (SoP) concerning the role of science. We note that the text in the current form provides significant practical guidance that should be available for use by the Chairperson's of subsidiary bodies as it provides an excellent opportunity to test and deploy the current provisions in real Codex activities.

CCEXEC SUBCOMMITTEE ON NEW FOOD SOURCES AND PRODUCTION SYSTEMS

Uganda welcomes the effort undertaken by the Subcommittee and the wealth of input that was submitted by Members on the subject of New Food Sources and Production Systems. A number of items that formed the subject of engagement such as edible insects are widely consumed in substantial quantity in the Country and present potential Food Safety issues which could be addressed through regional and international standards. We further note that Codex has existing structures and mechanisms of addressing new priorities that may be submitted by members and these could be leveraged on to provide the needed standards related solutions.

CCEXEC SUBCOMMITTEE ON THE FUTURE OF CODEX

Uganda is keen on the ongoing developments in this Subcommittee noting that the COVID-19 pandemic presented challenges, which affected the smooth undertaking of usual Codex business. We believe the lessons are important in informing how Codex may operate in the future. We further recognize that the virtual meetings opened opportunities for many members to participate in Codex work, which is a substantial gain we should not lose out as normalcy returns. The possibility of convening Codex sessions through hybrid means to a great extent provides the much needed flexibility to engage in Codex activities and we support such progressive endeavours. Additionally, it should be possible in the future to consider reviewing some of the specific procedures that would offer certainty and predictability within the Codex system when faced with unforeseen disruptive challenges. We believe this is one of the ways of ensuring sustainability and ultimately securing the future of Codex.

Agenda Item 4: FINAL ADOPTION OF CODEX TEXTS

4.5 Codex Committee on Contaminants in Foods (CCCF)

Proposed draft MLs for total aflatoxins in maize grain, destined for further processing; flour meal, semolina and flakes derived from maize; husked rice; polished rice; sorghum grain, destined for further processing; cereal-based foods for infants and young children (excluding foods for food aid programs), and cereal-based foods for infants and young children for food aid programs (CXS 193-1995) at Step 5/8

Uganda appreciates the extensive work that was done by the Committee supported by the relevant risk assessment bodies. Noting that the commodities in question are heavily staple products consumed in

significant quantities, the proposed Maximum Limits for Aflatoxins should provide the necessary level of health protection without hindering trade. It is on this premise that we do not favour adoption of MLs for Aflatoxins in maize grain, destined for further processing at 15 µg/Kg. We believe, as raised in the Codex Committee on Contaminants in Food that a lower ML of 10 µg/Kg would be protective enough and as well facilitate trade. Additionally, the justification that was advanced for separate MLs for cereal-based foods for infants and young children for the general population (at 5 µg/Kg) and that for food aid programs (at 10 µg/Kg) is not fully reflective of the realities. Uganda would favour providing similar MLs for Aflatoxins in cereal-based foods for infants and young children regardless of the use.

4.8 Codex Committee on Residues of Veterinary Drugs in Foods

Uganda would like to recall the extensive discussions held on the issue of MRLs for Zilpaterol hydrochloride (cattle fat, kidney, liver, muscle) at CCEXEC82 and CAC44 and the resulting innovative mechanisms that were established to seek for possible consensus on the matter. We note the robust scientific evaluation that was undertaken by JECFA and the conclusion that there were no public health concerns regarding the proposed MRL. Uganda supports the potential progression in the Codex step-wise process on account of the solid and robust scientific basis. We believe that science is key anchoring element within the Codex infrastructure and lasting pillar within the Codex mandate.

4.9 FAO/WHO Regional Coordinating Committees

FAO/WHO Coordinating Committee for Africa (CCAFRICA)

- **Draft Regional Standard for dried meat at Step 8**
- **Proposed draft Guidelines for developing harmonized food safety legislation for the CCAFRICA region at Step 5/8**

Uganda supports final adoption of the two regional texts having resolved all the outstanding issues on the documents. We believe the standard and guideline are timely and important for the effective implementation of the African Continental Free Trade Area as they would contribute to enhancing intra-Africa trade. Specifically, we believe that the completion of the guideline presents an excellent opportunity to further engage the members in the region to foster effective deployment and application that is important in developing or updating Food Safety legislation along the food chain including food traded nationally, regionally and internationally. We believe the region could be supported using the guideline as a main reference through the potential development initiatives in order to continue with the momentum already generated in development of the guideline.