

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
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World Health  
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Agenda Item 4,5,6,8

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ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

Forty-third Session

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(Comments from Thailand)

#### AGENDA ITEM 4 REVISED DOCUMENT OF THE PROPOSED DRAFT REVISION OF THE GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS: ORGANIC AQUACULTURE

##### Foreword, paragraph 7

Thailand does not agree with the addition of the issue regarding the guarantee of safe product because organic production is certified as a system, not product. Therefore if this issue is inserted, it could complicate not only the certification but also the practices of farmers. Moreover, this issue is not in the aim of these guidelines in Foreword paragraph 2.

##### Scope

###### 1.1 a)

Thailand proposes adding “aquatic plant” in the scope in order to explicitly mention all products covered by this guideline.

- Regarding the word “their products” after algae, Thailand does not object its reintroduction. However, it should be made clear that 1.1a) is about the “unprocessed” produce. Some products obtained from algae, such as carrageenan, are extracted from algae, passing the extraction process, will lie under 1.1b). Therefore if there is any unprocessed algae product available, then “their products” after algae can be reinserted.

###### 1.1b)

It should be noted that now the scope of this draft includes the production of organic feed, hence the name of this guideline should be amended accordingly to include the production of both organic food and feed.

Moreover, Thailand proposes a clearer indication whether “animal” in 1.1b) refer specifically to food producing animal or any animal which would include pets, like cats and dogs.

Another point we would like to make is whether or not Annex 1 clearly identify the requirements for animal feed production. If not, then this has to be considered which may not be out of the scope of TOR to work on the revision of this guideline to include the section on organic aquaculture.

#### SECTION 2 DESCRIPTION AND DEFINITIONS

##### Clean water

We recognize that the term “clean water” is also mentioned in RCP 52 therefore we propose, if this term to be defined in this guidelines, it should be defined the same as in RCP 52. However, we note that the term “clean water” is mentioned once in Section of Harvesting and Transport, thus it may be appropriate to use the wording defining clean water and cooperate into the relevant Section and delete this definition.

##### Food product/product of [agricultural/ agroforestry] or aquatic origin

For the proposal of adding the term “agroforestry”, although this guidance also mention about the wild harvest produce, using the term may cover too wide varieties of produces. Thus we do not agree with the use of such term.

## Section 5

We noticed that the criteria for evaluating chemicals are not well sequenced. We propose that after this section and the related Annex have been agreed then the sequence of the criteria should be rearranged accordingly.

## Section 6, Inspection and Certification Systems

Thailand proposes addition of some flexibility to this requirement by replacing the word “has to” or “must” with “should”.

We also would like to use the term such as “organic plan” or “organic production plan” as the term “management” implies a rather complicated and very detailed plan which may not be suitable for some farmers.

## Annex 1, A2 Aquatic Plants, Algae and Their Products

### General comments

We note that this section does not provide a clear distinction between the requirements for aquatic plants and seaweed as well as between wild and cultivated seaweed. We, therefore, would like to propose revision of this section to address each commodity clearly. Moreover the definition of aquatic plant is not very clear, therefore it may be easier for many countries to use this guideline if the definition of the aquatic plant is made clear.

### Specific comments

Paragraph 1: In this paragraph, there is a reference to “principles of organic farming”. Thailand is not certain to which section this reference is made to. Should it refer to any section of this guideline, the wording of the related text should be amended to clearly identify that the details in such section is the principles of organic farming.

Paragraph 2: Thailand recognized that this paragraph is one of the main principles of organic production and also mentioned in Foreword paragraph 7, it may be worthwhile to be repeated again to emphasise the importance of the maintenance of biodiversity and the quality of surrounding water.

However if consider this statement as a requirement, it is difficult to inspect whether or not the biodiversity of the aquatic environment is maintained. Therefore we propose to delete this paragraph or amend it to be more specific as a requirement.

Paragraph 7: We propose some amendment to the sentence in the square bracket to be as follows, “[The application of supplementary fertilizer, i.e. those listed in **Annex 2, Table 1B**, ~~using natural organic compounds~~ to the growing area should be restricted to pond cultivation.]”.

Rationale: The wording, “using national organic compounds”, is proposed to be deleted as the details in Table 1B clearly show the organic and inorganic substances permitted for use in aquaculture ponds. Also we propose not to abbreviate “Annex 2” as it may be confused with the Section “A2. Aquatic plants, Algae and their products”.

## Annex 1, B2 Aquaculture Animals and Their Products

### General comments

We propose that the use of the words “must” or “shall” should be restricted only to the requirements that can affect the organic integrity. As the Codex document is aimed to be used as an instrument or guidance for member countries to develop national regimes thus it may not be necessary to amend some requirements that do not affect the organic status of the products to be compulsory.

### Specific comments

Paragraph 1: This is the same case as paragraph 1 of Section A2 Aquatic Plants, Algae and Their Products. In this paragraph, there is a reference to “principles of organic farming”. Thailand is not certain to which section this reference is made to. Should it refer to any section of this guideline, the wording of the related text should be amended to clearly identify that the details in such section is the principles of organic farming.

Paragraph 2: This is the same case as paragraph 2 of Section A2 Aquatic Plants, Algae and Their Products. Thailand recognized that this paragraph is one of the main principles of organic production and also mentioned in Foreword paragraph 7, it may be worthwhile to be repeated again to emphasise the importance of the maintenance of biodiversity and the quality of surrounding water.

However if consider this statement as a requirement, it is difficult to inspect whether or not the biodiversity of the aquatic environment is maintained. Therefore we propose to delete this paragraph or amend it to be more specific as a requirement.

Paragraph 7: Thailand is of the opinion that buffer zone can be established by either competent authority or certification body depending on the production systems. In case of open production system, which the water from production unit connect with surrounding water, buffer zone is compulsory and shall be established by competent authority. On the other hand, in case of closed production unit, which the water from production unit is limited to connect with surrounding water, buffer zone may be applied and, if applied, can be established by certification body, or farmers, in the condition that the water system is clearly separated between the organic farming and conventional farming or open water.

Paragraph 8: Thailand is of the opinion that the exemption of conversion period for some cases may not be appropriate as there may still be some residues from the previous production, especially in the case of soil pond. We support the conversion period of at least one production cycle of the stock aquatic species for all cases.

Paragraph 16:

Regarding the use of synthetic amino acids:

Thailand agrees with the prohibition of the use of synthetic amino acids in feed as they are used to enhance the growth of aquatic animals thus incompatible with organic principle.

Regarding the limit of whole fish in feed for carnivorous aquaculture animals

Thailand supports the removal of “at an inclusion limit up to 60%”. We are of the opinion that the limit is not necessary as the amount of whole fish to be used as feed is already limited by being “caught in sustainable fisheries as determined by the competent authority”

Paragraph 20

Thailand would like to propose additional condition for the use of parasite treatments, for instance “parasite treatments may be used if no alternative permitted treatment or management practice exists”. In our practice, if stock is treated with parasiticides, it loses its organic status. However, if this guideline will permit its use, the treatment should be strictly controlled.

Paragraph 22

Thailand notes that the word, “clean water” only appears in this paragraph thus it may not be necessary to define it in Section 2 Description and Definition. Therefore we propose removing the word, “clean water” in Section 2. For this paragraph, we propose amending the text by modifying its definition appropriately and delete “clean water”.

## **AGENDA ITEM 5 DATE MARKING (REVISION OF THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS)**

### 2. Definition of Terms

Thailand agrees with the terms, their synonyms and their definitions as agreed in CCFL 42.

### 4.7 Date marking and storage instructions

#### 4.7.1 (i)

Thailand agrees with the amendment made by CCFL 42 however we are of the opinion that clarification is needed for the footnote.

## 4.7.1 (iii)

Thailand agrees with amendment made by CCFL 42.

## 4.7.1 (iv)

Thailand proposes amendment to this paragraph to be as follows:

“The day and year ~~shall~~ **may** be declared by uncoded numbers numerical sequence except that with the year to be denoted by 2 or 4 digits, and the month ~~shall~~ **may** be declared by letters or characters or numbers. Where only numbers are used to declare the date or where the year is expressed as only two digits, the sequence of the day month year must be given by appropriate abbreviations accompanying the date mark. (e.g. DD/MM/YYYY)

Rationale: 1. The day and year must be declared by uncoded numbers in all cases in order to accommodate consumers in understanding the numbers displayed.

2. The month can be declared by letters or characters or numbers depending on the practices of different countries thus the options should be opened by using the word “may”.

3. The example of date mark should be “DD/MM/YY” to be consistent with the requirement which states that “where the year is expressed as only two digits”.

## 4.7.1 (v)

- Thailand supports the list of food items as it has been used for many years and easily understood by many countries. However this list should be amendable as appropriate.

- For the sub-paragraph we propose some amendment as follows:

“Where a product is not required to bear a date mark in accordance with provision the “Date of Manufacture” or the “Date of Packaging” ~~may/shall~~ be used.”

Rationale: we supports the use of the word “may” to allow flexibility of using Date of Manufacture” or the “Date of Packaging” of these foods to facilitate stock rotation and to provide information to consumers.

We propose that this sentence should be made clear that to which provision this sentence is referring to.

## 4.7.1 (x)

Thailand support voluntary use of more than one type of date mark with clear indication of each type to avoid consumer confusion. Thus this sentence in square bracket should be deleted.

## **AGENDA 6 LABELLING OF NON-RETAIL CONTAINERS (DISCUSSION PAPER)**

Thailand does not object the proposal to revise Codex Stan 1-1985 to include the requirements for the labeling of non-retail containers. However we propose that the section for non-retail containers should be separated from the pre-packaged food.

## **AGENDA 8 PROPOSAL TO REVISE THE GENERAL GUIDELINES FOR THE USE OF THE TERM “HALAL”**

Thailand does not object the proposal to revise the General Guidelines for the Use of the Term “Halal”. This could enhance the harmonization of standards related to the use of term “Halal” of different countries.