

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 7(b/c)

CX/PR 22/53/7-Add.1

PART I: CLASS B (Agenda Item 7a)

PART II: CLASS E (Agenda Item 7b)

June 2022

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDES

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4-8 and 13 July 2022

CLASS B – PRIMARY FOOD COMMODITIES OF ANIMAL ORIGIN (ALL TYPES) (AT STEP 4)

CLASS E - PROCESSED FOODS OF ANIMAL ORIGIN (ALL TYPES) (AT STEP 4)

Comments in reply to CL 2022/35-PR

*Comments of Canada, Egypt, European Union (EU), Kenya, Philippines, Thailand,
United States of America (USA)*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2022/35-PR¹ issued in May 2022. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached in the **Annex** and are presented in table format.

¹ Codex circular letter, including CL 2022/35-PR, are available on the Codex webpage/Circular Letters:

<http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>

or on the dedicated Codex webpage/CCCF/Circular Letters:

<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCPR>

Annex**GENERAL COMMENTS**

COMMENT	MEMBER / OBSERVER
<ol style="list-style-type: none"> 1. Canada acknowledges the work of the EWG on Classification of Food and Feed in revising Class B and E and supports the overall approach to the revisions. 2. Canada thanks the EWG for including honey and other bee products and supports the proposed revisions to Class B, including the additional commodities and subgroups. Canada supports the proposed revisions to Class E, including the additional commodities and subgroups. 3. Thus Canada supports the advancement of the revised Class B and Class E in the Step Procedure. 	Canada
Egypt appreciates the work done in the document and agrees on it	Egypt
The European Union (EU) would like to thank the Electronic Working Group (eWG) on the revision of the Classification of food and feed chaired by the United States of America and co-chaired by the Netherlands for the preparation of the draft on the revision of the Codex Classification of Foods and Animal Feeds.	EU
The Philippines generally agrees with the overall proposed revision for the Classification of Food and Feed: Class B – Primary Food Commodities of Animal Origin and Class E - Processed Foods of Animal Origin (All Types), i.e., inclusion of additional commodities, creation of subgroups, new group & type, and supports the advancement of the revised Class B and Class E to the next Step procedure. The Philippines acknowledges these revisions will enable easier facilitation of categorizing both primary food and processed food commodities of animal origin.	Philippines

PART I: CLASS B (Agenda Item 7a)**CLASS B PRIMARY FOOD COMMODITIES OF ANIMAL ORIGIN**

COMMENT	MEMBER / OBSERVER
<p>The EU acknowledges the consideration given by the eWG to the list of products of animal origin presented in 'Annex I' of Regulation (EC) No 396/2005 of the European Parliament and of the Council, and welcomes the efforts made by the eWG to harmonise the list of products presented in 'Annex I' with those present in Class B, Primary Food Commodities of Animal Origin.</p> <p>The EU has no comments to the revised Class B as presented in the Appendix I of the document and agrees that the proposed changes will be implemented in the Codex database.</p>	EU
<p><u>Comment:</u> Kenya appreciates the Electronic Working Group chaired by the United States of America and co-chaired by the Netherlands and is in support of the reclassification and addition of groups and subgroups of commodities as was highlighted.</p>	Kenya
<p>According to the consideration during CCRVDF25 about how skin would be treated and situation where skin is consumed separately from the muscle, and considered as edible offal, we observed that only poultry skin (PO113) is listed as edible offal in Group 038. Edible skin from other animals, which are also significantly consumed and traded internationally, should be included in the group of edible offal. Thus, we propose to add pig skin in Subgroup 032G (Swine edible offal) and fish skin, e.g. salmon skin, in Subgroup 043B (Edible offal of fish).</p>	Thailand
<p>The United States would like to provide the following General Comments on Class B-- Primary Food Commodities of Animal Origin (All Types) and on Class E- Processed Foods of Animal Origin (All Types).</p> <p><u>CLASS B:</u> According to the working document for this agenda item (CX/PR 22/53/7), the Electronic Working Group recommends that the revised Class B include additional commodities and that several subgroups be created within existing groups. A new group 'Insects and spiders' has been created and a new type 'MISCELLANEOUS PRIMARY FOOD COMMODITIES OF ANIMAL ORIGIN' has been added for the inclusion of honey and other bee products. The United States supports the proposed revisions to Class B, including the additional commodities and subgroups.</p> <p><u>CLASS E:</u> According to the working document for this agenda item (CX/PR/22/53/8), the EWG recommends the inclusion of additional commodities and three subgroups for Group 080, the use of Reserved Group 081 to create Group 081 Dried meat and avian products (that would include seven avian processed commodities) and dividing Group 085 into four subgroups. The United States supports the proposed revisions to Class E, including the additional commodities and subgroups.</p>	USA

PART II: CLASS E (Agenda Item 7b)**CLASS E PROCESSED FOODS OF ANIMAL ORIGIN****General Comments**

COMMENT	MEMBER / OBSERVER
<p>The EU has no comments to the information presented in the Appendix I of the document and agrees that the proposed changes will be implemented in the Codex database, following the agreement on the revised classification of the Types 06, 07, 08, 09 and the newly proposed Type xx for “Miscellaneous Primary Food Commodities of Animal Origin”.</p>	EU
<p>Comment: Kenya appreciates the Electronic Working Group chaired by the United States of America and co-chaired by the Netherlands and is in support of the reclassification and addition of groups and subgroups of commodities as has been highlighted.</p>	Kenya
<p>As the addition of insect in a new group: Insects and spiders, within Type 10 (Invertebrate animal Groups) of Class B, the processed insect commodities should be incorporated in Class E:</p> <ol style="list-style-type: none"> 1. dried whole insect, with and without seasoning 2. fried insects, with and without seasoning 3. insect powder <p>In addition, we propose to include dried edible bird’s nest (EBN) which is the saliva of swiftlets in Class E; as follows:</p> <ol style="list-style-type: none"> 1. dried edible bird’s nest 2. edible bird’s nest’s products, e.g. bird's nest drinks https://en.wikipedia.org/wiki/Edible_bird%27s_nest <p>Edible bird’s nest (EBN): salivary secretion from avian species</p> <p>Edible bird’s nest (EBN), or cubilose, is a health food supplement originated from salivary secretion by specific swiftlets, mainly from <i>Aerodramus fuciphagus</i> and <i>Aerodramus maximus</i> (Kang et al., 1991). Southeast Asian countries, including Indonesia, Malaysia, Vietnam, and Thailand, are the major exporting countries of EBN (C.-F. Wong et al., 2017).</p>	Thailand

Specific comments

COMMENT	MEMBER / OBSERVER
<p>Group 080 Dried meat and fish products</p> <p>Comment: Kenya Proposes to include dried and smoked fish from Fresh Water. Justification: Kenya trades in dried and smoked fish of fresh water origin that are not covered in this classification as referenced in Group 040.</p>	Kenya
<p>Group 081 Dried meat and avian products</p> <p><u>Comment 1</u>: Kenya proposes to revise the title to read; Avian Products <u>Justification</u>: For clarity as dried meat is a product of avian origin. Dried meat should be a subgroup with a code under the listed commodities <u>Comment 2</u>: Kenya proposes to add more products to the subgroups including; pasteurized liquid egg (yolk, egg white and scrambled) and in dried form. <u>Justification</u>: These products are already in the market.</p>	Kenya
<p>FA 0142 Processed Fat (Blubber), of Whales, Dolphins and Seals</p> <p>Editorial comment: Seals</p>	Kenya
<p>FM XXXX Caprine milk fat</p> <p><u>Comment 1</u>: Kenya notes that below Caprine milk fat is where goat milk fat should appear and therefore suggest the use scientific names and relevant examples given below them. This is as given in Ovine milk fat and where sheep milk fat is indicated below. <u>Justification</u>: To maintain consistency within the document, this also applies to other misplaced examples given in the document. <u>Comment 2</u>: Kenya proposes the use of scientific names after adoption. <u>Justification</u>: For clarity.</p>	Kenya
<p>Subgroup 032G Swine edible offal</p> <p>We propose to add pig skin in Subgroup 032G (Swine edible offal).</p>	Thailand
<p>Group 039 Eggs</p> <p>Comment: Kenya proposes to include guinea fowl and turkey eggs. Justification: These species have been covered in group 039 as avian which also lay edible eggs.</p>	Kenya
<p>Group 042 Marine fish</p> <p><u>Comment</u>: Kenya proposes the need to consider classification and addition of Siganus Argentius (rabbit fish) <u>Justification</u>: This species is common in marine cage farming in Kenya. Reference from FAO Handbook.</p>	Kenya

COMMENT	MEMBER / OBSERVER
<p>Fish roe (including milt = soft roe) and edible offal of fish</p> <p><u>Comment</u>: Kenya proposes the addition of fish maw (swim bladder). <u>Justification</u>: This is an edible fish offal delicacy widely consumed and traded.</p>	Kenya
<p>Subgroup 043B Edible offal of fish</p> <p>We propose to add fish skin, e.g. salmon skin, in Subgroup 043B (Edible offal of fish).</p>	Thailand
<p>Group 0xx <i>Miscellaneous primary food commodities of animal origin</i></p> <p><u>Comment</u>: Kenya proposes to add propolis under honey. <u>Justification</u>: Propolis is a honey byproduct that is traded and consumed mainly as a food supplement and/or for its medicinal purposes.</p>	Kenya