

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 3.1, 3.3 and 4

ASIA21/CRD11

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### FAO/WHO COORDINATING COMMITTEE FOR ASIA

#### Twenty-first Session

Goa, India 23 - 27 September 2019

#### Comments of India

### AGENDA 3.1: EMERGING ISSUES IN FOOD SAFETY AND QUALITY IN COUNTRIES OF THE REGION

1. **General comments:** India appreciates the work done by the FAO and WHO highlighting the concerns on the emerging issues in countries of the region. The feedback from participating countries on this topic of emerging issues, as well the approaches followed to ensure these consultations are welcome approach to help Member countries in assessing their food control systems including capacity to identify emerging issues. Further, the publication of the FAO/WHO Food Control System Assessment Tool, which can be used by the Member countries in identifying and addressing key issues.

#### 2. Specific comments:

The committee while deliberating these issues should also prioritise emerging issues identified through this survey particularly the veterinary drug residues and AMR, pesticide residues, food fraud and authenticity, online sale of food and climate change and the same may be informed to the CAC 43.

1. While the use of antimicrobials on the farm helps reduce the prevalence of pathogenic microorganisms, it also creates antimicrobial resistance among some of these pathogens with negative consequence on public health including difficulties for patients to be treated for conditions that need antibiotics. To address this issue
  - the regulatory authorities should have robust regulatory systems to better control over use, misuse and abuse of antimicrobial substances in humans, animals and plants.
  - The One Health approach to address AMR needs to be emphasised across the regions
  - Regional/ National surveillance program for AMR.
2. Presence of pesticide residues above MRLs is a legitimate concern. To address this issue, a collaborative approach including development of network among relevant ministries; development of GAP including integrated pest management (IPM) and strengthening of legal and regulatory frameworks should be followed.
3. Food fraud misleads the consumer causing the sale of poor quality goods and ultimately posing risks to human health. as well as business losses. Countries should identify such activities particularly with the food products which are vulnerable. India had conducted such assessments under the FAO project and identified the vulnerable food sector. Basis the report, suitable amendments in the Act have been proposed to have the stringent penalties for possessing the adulterants and making the food unsafe.
4. As captured in the report, online sale of food i.e. e-commerce platforms now a day a major concern in the regulatory ecosystems. In India, e-commerce businesses have been defined and covered under the regulatory framework through the mandatory requirements of licensing/ registration, responsibilities like displaying / listing of food products along with their licence number and also to ensure the remaining shelf-life of at least 30% at the time of delivery.

### AGENDA 3.3: FOOD SAFETY AND QUALITY SITUATION IN THE COUNTRIES OF THE REGION- USE OF THE ONLINE PLATFORM FOR INFORMATION SHARING ON FOOD SAFETY CONTROL SYSTEMS; STATUS OF INFORMATION AND FUTURE PLANS/PROSPECTS

#### General comment:

We understand that the platform has been built so that information shared by members is available to other members and it serves as a global source of information. However, it seems that the information shared by

the other members are not accessible by other members. Therefore, we would like to seek clarification, as to whether the information will be accessible by other members in the future.

We would also like to highlight that at Annex 2, information with respect to “**National capacity in food safety**”, India has completed this information at the time of submission of its response to the survey, however, it appears as “NA” in the entry corresponding to India.

#### **Specific comments:**

#### **Paragraph 5: RECOMMENDATIONS**

5.1 (a) Is the online platform considered fit for purpose?

**Comment:** Yes, the platform is a useful tool to share information regarding national food control systems and should be continued.

(b). What issues prevent Member Countries from uploading information to the platform?

**Comment:** None

d. How can the online platform be improved to better serve its purpose?

**Comment:** India suggests that this platform should also include components on regulatory compliance and emergency response systems.

#### **Agenda 4: USE OF CODEX STANDARDS IN THE REGION**

**Paragraph 4: RECOMMENDATION:** 4.2 CCASIA is further requested to provide inputs on the following questions to guide future action by the Codex Secretariat in this area:

1. *Next survey:* Would you like to see a continuation of the survey? If so, which areas of Codex work would you like to see covered in future surveys on the use of Codex standards?

**Comment:** Yes, we would like the survey to be continued, since it serves the purpose of assessment of the national systems with respect to the application of the codex texts. We recommend including following Codex texts for the next survey:

- i. The use of standards and guidelines under the Codex Committee on Methods of Analysis and Sampling
- ii. General Guidelines on Claims (Food Labelling)
- iii. Principles of National Food Control Systems (Food Import Export Inspection and Certification Systems)

2. *Evaluation of Codex standards:* How feasible do you consider responding to annual surveys on use of Codex standards? Which actions should be taken to increase survey response rates? Are there any national or regional efforts ongoing to assess the level of use of Codex standards?

**Comment:** “Monitoring the use of Codex standards” is also under discussion in the Codex Committee on General principles (CCGP), which is looking at possible ways to address this issue. Therefore, we suggest awaiting CCGPs decision on this matter.

Yes, we are assessing the level of harmonization with Codex texts continuously and efforts are being made to align national legislation with those of Codex standards where feasible.