CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 5 **CX/CAC 13/36/4 -Add.1**
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED TO THE COMMISSION FOR ADOPTION AT STEP 8 AND 5/8 OF THE PROCEDURE

(Comments submitted by 20 June 2013)

PART 1 - STANDARDS AND RELATED TEXT SUBMITTED FOR ADOPTION

Committee on Fresh Fruits and Vegetables
Comité sur les fruits et légumes frais
Comité sobre Frutas y Hortalizas Frescas

Draft Standard for Avocado (revision of CODEX STAN 197-1995) at Step **8** (para. 42 and Appendix II).

Comments of Philippines

PHILIPPINES

The Philippines supports the adoption of draft standard for avocado at Step 8.

Rationale:

The Philippines supports the provision that the minimum requirements for avocado should have reached a stage of physiological development which ensures the completion of the ripening process. A maturity index being considered by the Philippine Hass avocado industry has a 23% dry matter content at harvesting time which is within the minimum requirement that the fruit have a dry matter content of 21% for Hass variety and 20% for other varieties.

Draft Provisions for Uniformity Rules and other Size-Related Provisions (Sections 5.1 – Uniformity and 6.2.4 – Commercial Identification) in the Draft Standard for Avocado, at Step 8 (REP13/FFV para. 42 Appendix II)

Comments of Philippines

PHILIPPINES

The Philippines supports the adoption of the Draft Provisions for Uniformity Rules and Other Size-Related Provisions (Sections 5.1 – Uniformity and 6.2 – Commercial Identification) in the Draft Standard for Avocado.

Rationale:

The Philippines is of the view that the contents of each package must be reasonably uniform and contain only avocados of the same origin, variety, quality and size for the purpose of fair trade. Furthermore, the visible part of the contents of the package must be a representation of the entire contents and shall be in compliance with the Recommended International Code of Practice for Packaging and Transport of Fresh Fruits and Vegetables (CAC/RCP 44-1995).

Draft Standard for Pomegranate, at Step 8 (REP13/FFV para. 53 and Appendix III)

Comments of Philippines

PHILIPPINES

The Philippines supports the adoption of the draft Standard for Pomegranate at Step 8.

Rationale:

The Philippines supports the use of the term "arils" as the correct term to describe the edible part of the pomegranates and be applied across the standard where appropriate.

Proposed Draft Provisions for Sizing and Uniformity Rules (sections 3 and 5.1) (Draft Standard for Pomegranate), at Step 5/8 (REP13/FFV para. 53 and Appendix III)

Comments of Philippines

PHILIPPINES

The Philippines supports the adoption of the Proposed Draft Provisions for Sizing and Uniformity Rules (Sections 3 and 5.1) (Draft Standard for Pomegranate) at Step 5/8.

Rationale:

The Philippines is of the view that the use of sizing table for sizing pomegranate by weight or diameter will be a useful guide for commercial trading. Likewise, each sales package must take into consideration that it contains only pomegranates of the same origin, variety, quality and size.

Committee on Fish and Fish Products
Comité sur les poissons et les produits de la pêche
Comité sobre Pescado y Productos Pesqueros

Draft Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish, at Step 8 (REP13/FFP para. 40, Appendix III)

Comments of Norway, Philippines

NORWAY

Norway supports the adoption of the Draft Standard for Smoked Fish, Smoke Flavoured Fish and Smoke Dried Fish; however we would like to give our reservation to the use of Sunset Yellow FCF (INS 110). The reason for this is that the European Food Safety Authority has decreased the ADI which might be exceeded taking into account all other provisions for this food additive in the General Standard for Food Additives.

PHILIPPINES

The Philippines supports the adoption of the Draft Standard for Smoked Fish and Smoked Dried Fish at Step 8, with the exception of the provision on Food Additives which was returned to Step 6.

Rationale:

The standard will serve as an important tool to further enhance the quality, and thus the competitiveness of the of our smoked fish products. Last year, the Philippines had exported some 3,250 MT of dried and smoked fish products valued at US$14.7M.

Draft Standard for Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing, at Step 8 (REP13/FFP, para. 83, Appendix IV)

Comments of Phllippines

PHILIPPINES

The Philippines supports the adoption of the Draft Standard for Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing at Step 8.

Rationale:

Though the country has not provided relevant inputs in the final drafting of this standard, the adoption of this document is timely in as much as the technology of farming abalone in our waters had greatly improved over the years.

Proposed Draft Amendment to the Standard for Quick Frozen Fish Sticks, at Step 5/8 (REP13/FFP para. 108, Appendix V)

Comments of Phllippines

PHILIPPINES

The Philippines supports the adoption of the Proposed Draft Amendment to the Standard for Quick Frozen Fish Sticks at Step 5/8.

Rationale:

The amendment is specific for the inclusion of an additional species (South Atlantic Hake with a Nitrogen Factor of 2.45. The said species is not available in the country, hence no comment was given. Hopefully, the proposed research work for N-factor for Philippine fish species used for fish sticks will be undertaken soonest in order for these species to be considered in the said table.

Proposed Draft Revision of the Procedure for the Inclusion of Additional Species in Standards for Fish and Fishery Products, at Step 5/8 (REP13/FFP para. 128, Appendix VI)

Comments of Philippines

The Philippines supports the adoption of the Proposed Draft Revision of the Procedure for the Inclusion of Additional Species in Standards for Fish and Fishery Products at Step 5/8.

Rationale:

The said document will provide important basis in developing guidelines for commercially-important species that may have export potential. This is also helpful in justifying the need for continuous studies on fishery resource stock assessment.

FAO/WHO Coordinating Committee for Asia
Comité FAO/OMS de coordination pour l'Asie
Comité Coordinador FAO/OMS para Asia

Proposed Draft Regional Standard for Tempe, at Step 5/8 (REP 13/ASIA para. 117, Appendix II)

Comments of Philippines

PHILIPPINES

The Philippines supports the adoption of the standard at step 5/8

Rationale:

No local food establishment registered. For regulatory purposes on possible imports, a standard is vital.

Committee on Food Hygiene
Comité sur l'hygiène alimentaire
Comité sobre Higiene de los Alimentos

Proposed Draft Principles and Guidelines for the Establishment and Application of Microbiological Criteria, at Step 5/8 (REP13/FH para. 56, Appendix III)

Comments of Phillippines

PHILIPPINES

The Philippines supports the adoption of the Proposed Draft Principles and Guidelines for the Establishment and Application of Microbiological Criteria for Foods at Step 5/8.

Rationale:

The Philippine supports the adoption of the proposed draft since it will serve as a guidance and easy reference at national level for the establishment and application of Microbiological Criteria for Foods

Proposed Draft Annex on Berries to the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003), at Step 5/8 (REP13/FH para. 118, Appendix IV)

Comments of Philippines

PHILIPPINES

The Philippines supports the adoption of the Proposed Draft Annex on Berries to the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) at Step 5/8.

Rationale:

The Philippines supports the adoption of the proposed draft. To provide examples of biodegradable materials (e.g. rice straw, paper and banana leaves) used during growing and harvesting by small farmers which is being used in the Philippines.

Committee on Nutrition and Food for Special Dietary Uses
Comité sur sur la nutrition et les aliments diététiques ou de régime
Comité sobre Nutrición y Alimentos para Regímenes Especiales

Draft Revised Guidelines on Formulated Supplementary Foods for Older Infants and Young Children, at Step 8 (REP13/NFSDU para. 41, Appendix II)

Comments of Philippines

PHILIPPINES

The Philippines supports the revision of the current Guidelines particularly updating of specific provisions made to description, raw materials and ingredients, nutritional composition and quality factors and labeling.

Rationale:

The Philippines supports the revision of the current Guidelines because nutrition and science have evolved since its adoption in 1991. The revised draft is based on current scientific evidence reflecting the current dietary patterns of older infants and young children. We are of the view that the revised Guidelines was able to address issues to ensure that complementary foods are nutritionally adequate, safe and appropriate to older infants and young children to meet this group's energy and nutrient needs.

Draft Nutrient Reference Values (NRVs), at Step 8 (REP13/NFSDU para. 65, Appendix V)

Comments of Philippines

PHILIPPINES

Philippine Position on the Draft Nutrient Reference Values (Saturated Fat) proposed for adoption at Step 8 at the 36th CAC

Nutrient	NRV-NCD
Saturated Fat	20 g

The Philippines does not support the above proposed Nutrient Reference Value for diet related Non-Communicable Diseases (NRV-NCD) of 20 g for saturated fatty acids (SFA) at the 36th CAC.

Rationale:

Following is the basis for this position:

1) The 35th CAC returned the NRV-NCD for saturated fat to the Codex Committee on Nutrition and Foods for Special Dietary Uses at Step 5 **to await the outcome of the systematic review. The 36th CAC should remain consistent with this agreement.**

The results of the systematic review of the 5th Meeting of the WHO Nutrition Guidance Expert Advisory Group (NUGAG) Subgroup on Diet and Health on saturated fatty acids and trans-fatty acids are not yet available. **Adoption of the NRV at the 36th CAC is thus premature and should wait for the results of this review.**

2) Many scientific studies indicate that there is no sufficient evidence to draw conclusions on the risks of saturated fat in *all* diet-related non-communicable diseases.

- The meta-analysis by Siri-Tarino, et al 2010a showed that:

  There is insufficient evidence from prospective epidemiologic studies to conclude that dietary saturated fat is associated with an increased risk of CHD, stroke, or CVD.

- Considering the changing landscape of CVD risk factors and the increasing importance of the atherogenic dyslipidemia associated with obesity, insulin resistance, and type 2 diabetes:

  The relative effect of dietary saturated fat on CVD risk requires re-evaluation (Siri-Tarino, et al 2010b).

- Multivariate analyses showed that:

  Saturated fat intake was not associated with risk of myocardial infarction compared with carbohydrate consumption (Jakobsen,et al, 2010).

  Studies have not shown a clear association between saturated fat intake to the outcomes of obesity, and incidence of cancer and osteoporosis (Astrup, et al, 2011).

- **Studies have also shown that even if diets enriched in saturated fat and cholesterol increase LDL-cholesterol concentrations it also increases HDL-cholesterol concentrations (good cholesterol)**. This may serve as a precaution that:

  Population-wide recommendations for all persons at all ages and circumstances to reduce their intake of saturated fats may be premature due to lack of a scientific, mechanistic understanding of these relations. (German and Dillard, 2004). Lawrence (2013) also called for:

  Re-evaluation of existing dietary recommendations that focus on minimizing dietary SFAs, for which mechanisms for adverse health effects are lacking.

- Dietary recommendations should be considered carefully since:

  Post-hoc meta-regression indicated that neither low fat diet nor high fat diet showed definite beneficial effects on blood lipids. (Schwingshackl and Hoffman, 2012).

- **Restrictions in total and saturated fat has spurred a compensatory increase in consumption of refined carbohydrates and added sugars—a dietary shift perceived to contribute to the current twin epidemics of obesity and diabetes in the US population**. (Hu, 2010). In addition,

  Replacement of SFA by carbohydrates provides no benefit in terms of CHD risk (Uauy, 2009) **and for reducing CVD risk** (Smit et al 2009).

- **Replacement of SFA in foods with other macronutrients may have negative effects on incidence of coronary heart disease (CHD)**. While substitution of SFAs with polyunsaturated fatty acids (PUFAs) in dietary intake has been claimed to lower CHD risk, this has also been associated with an increase in inflammatory diseases and the metabolic syndrome, particularly in the case of high linoleic acid (omega-6) consumption (Martinelli et al., 2008).

- **An updated meta-analysis of linoleic acid intervention trials showed no evidence of cardiovascular benefit** (Ramsden et al., 2013). Thus, the benefit of replacing saturated fat with omega-6 rich fat is not supported by current evidence.

- **In some non-westernized populations myocardial infarction, stroke and metabolic syndrome and obesity are rare, yet these groups obtain about 17% of their calories from saturated fat** (comment quoted by Nettleton et al, 2011).

3) **The concern with saturated fat started in the 1950's when studies claimed that saturated fat led to high serum cholesterol and that high serum cholesterol led to cardiovascular disease**. From this, it was

concluded that saturated fats caused cardiovascular disease (Keys, 1980). **However, this conclusion was based on a very limited survey of only seven countries, which included the US and five European countries, which consume primarily saturated long-chain fats from animal sources**. On the other hand, a number of other studies on tropical countries which consume a diet based on coconut oil do not support this purported link between saturated fat (from coconut oil), cholesterol, and cardiovascular disease (Prior,1973; Prior et al., 1981; Florentino and Aguinaldo, 1987; Kumar, 1997; Lipoeto et al., 2004).

Otto et al (2012) also did not observe any association between saturated fat from plant or butter and CVD risk. Further, recent data from the WHO (2010) on 192 countries did not show any correlation between total serum cholesterol and deaths from cardiovascular disease.

4) Furthermore, a guideline that will cover all saturated fats could be uncalled for since some saturated fats, like those in coconut oil, may have different effects on NCDs.

A cohort study of Feranil et al (2011) of 1,839 Filipino women (age 35-69 years) found that dietary coconut oil intake was positively associated with high density lipoprotein cholesterol especially among pre-menopausal women, suggesting that coconut oil intake is associated with beneficial lipid profiles.

Reiser's review as cited in Blackburn, et al (1990) showed that in human studies, data do not demonstrate that coconut oil is hypercholesterolemic but rather, it is neutral.

The available population studies in Polynesia, Philippines and Sri Lanka indicated that dietary coconut oil does not lead to high serum cholersterol, CHD or mortality rate (Kaunitz and Dayrit, 1992). Moreover, coconut oil consumption was not significantly associated with low density lipoprotein cholesterol or triglyceride values.

In fact, several recent analyses indicated that saturated fat particularly in dairy products and coconut oil can improve health (Lawrence, 2013). Lastly:

Intake of virgin coconut oil significantly increased the good cholesterol in blood of the trial participants in a clinical study (UST Research Center for the Natural and Applied Sciences, 2012).

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Proposed Draft General Principles for Establishing Nutrient Reference Values (NRVs-NCD) for the General Population; and Consolidated Version of the *General Principles for Establishing Nutrient Reference Values*, at Step 5/8 (REP13/NFSDU para. 51, Appendix III para. 59, Appendix IV)

Comments of Philippines

PHILIPPINES

The Philippines supports the retention of the new underlined text in brackets in the statement "Governments are encouraged to use the NRVs-NCD, or alternatively, consider the suitability of the general principles below [including the level of evidence required,] and additional factors specific to a country or region in establishing their own reference values for labelling purposes, for nutrients associated with diet-related non communicable diseases." in the Preamble only.

Rationale:

The Philippines reiterates its previous position of supporting the use of convincing/generally accepted scientific evidence as the sole basis for establishing Codex nutrient reference values for nutrients associated with diet related non-communicable diseases. The use of convincing evidence is consistent with 2002 FAO/WHO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases. In retaining the

bracketed text [including the level of evidence required] in the Preamble, we are of the opinion that this would give enough flexibility to national government to consider the level of evidence other than convincing/generally accepted evidence in establishing NRV-NCD. However, we believe that the bracketed text in the Preamble is sufficient without specifying consideration of other evidences in *other* sections.

In the General Principles 3.1 Criteria for Selection of Nutrients, the Philippines supports retention of the bracketed text "Relevant convincing generally accepted scientific evidence for the relationship between a nutrient and non-communicable disease risk, including validated biomarkers for relevant disease risk [for at least one major segment of the population (e.g., adults).]

Rationale:

Adult population should be the reference population since this clarifies the fact that the level of evidences could be different according to the studied populations, but need to be, at least convincing for one major part of the population which is the adult population. Scientific evidence relating a nutrient to diet related NCD should be with the adult population. Adult population and their exposure to risk factors was used as set of indicators for global monitoring of progress towards reducing the impact of NCD (2012 Revised WHO Discussion Paper).

Proposed Draft Additional or Revised Nutrient Reference Values for Labelling Purposes in the *Guidelines on Nutrition Labelling*, at Step 5/8 (REP13/NFSDU para. 103, Appendix VII)

Comments of Philippines

PHILIPPINES

The Philippines supports the proposed Suitable Nutrient Reference Values (Vitamin K, Thiamine, Riboflavin, Niacin, Vitamin B6, Folate, Vitamin B12, Panthothenate, Biotin, Calcium and Iodine.

Rationale:

The Philippines finds the proposed NRVs for the above vitamins and minerals as suitable since most of the values of these nutrients are similar, if not closely similar with the values of the Philippine Recommended Energy and Nutrient Intake (RENI) for these nutrients.

Task Force on Animal Feeding
Groupe spécial intergouvernemental sur l'alimentation animale
Grupo de Acción Intergubernamental Especial sobre Alimentación Animal

Draft Guidelines on Application of Risk Assessment for Feed, at Step 8 (REP13/AF, para. 27, Appendix II)

Comments of Philippines

PHILIPPINES

The Philippines supports the Draft Guidelines on Application of Risk Assessment for Feed at Step 8.

Rationale:

The draft will be a very useful guide for the risk manager in conducting risk assessment in feeds and feed ingredients. It is especially useful in the Philippines considering that we have not conducted any risk assessment in feeds before. The draft explains the risk assessment procedure using the Codex risk analysis framework and that risk assessment should be a science-based process and should be based on all relevant available scientific data which takes into account qualitative information.

Proposed Draft Guidance on Prioritizing Hazards in Feed, at Step 5/8 (REP13/AF para. 62, Appendix III)

Comments of Philippines

PHILIPPINES

The Philippines supports the proposed draft Guidance on Prioritizing Hazards in Feed to the 36th Session of the Commission for adoption at Step 5/8.

Rationale:

It identifies the different steps in prioritizing hazards in feeds and feed ingredients which are very useful to regulatory officers in determining priority feed hazards under local conditions.

Committee on Food Import and Export Inspection and Certification Systems
Comité sur les systèmes d'inspection et de certification des importations et des exportations alimentaires
Comité sobre Sistemas de Inspección y Certificación de Importaciones y Exportaciones de Alimentos

Draft and Proposed Draft Principles and Guidelines for National Food Control Systems, at Step 8 and 5/8 (REP13/FICS para. 38, Appendix II)

Comments of Philippines

PHILIPPINES

The Philippines supports the proposal for Sections 1 and 3 for adoption at step 8 and Section 4 at Step 5/8.

Rationale:

The Philippines has contributed in the drafting and actively participated in eWGs created and during deliberations of Sections 1 to 3 for 3 consecutive CCFICS Sessions. We believe that the document will be very good reference/guidance in the operations of the Philippine national food control system.

Committee on Fats and Oils
Comité sur les graisses et les huiles
Comité sobre Grasas y Aceites

Proposed Draft Amendment to Parameters for Rice Bran Oil in the *Standard for Named Vegetable Oils*, at Step 5/8 (REP13/FO para. 89, Appendix III)

Comments of Philippines

PHILIPPINES

The Philippines supports the draft amendment to parameters for rice bran oil in the Standard for Named Vegetable Oils at Step 5/8.

Rationale:

Rice bran, a by-product of rice milling is an under-utilised ingredient with significant potential as a source of nutritional components, rice bran oil being one of these. Currently, because rice bran deteriorates rapidly right after milling, the ingredient is rendered as waste material and not fit to use as food, both for human and animals. Aware of the significant potential of rice bran, the Department of Science and Technology (DOST) is providing financial support to R&D projects geared towards the stabilisation of rice bran.

Committee on Methods of Analysis and Sampling
Comité sur les méthodes d'analyse et d'échantillonnage
Comité sobre Métodos de Análisis y Toma de Muestras

Draft Principles for the Use of Sampling and Testing in International Food Trade, at Step 8 (REP13/MAS para. 73, Appendix III)

Comments of Philipines

PHILIPPINES

The Philippines supports the adoption of the Draft Principles for the Use of Sampling and Testing in International Food Trade at Step 8.

Rationale:

Sampling and testing procedures are utilized to determine if foods in trade are compliant with particular specifications. Hence, these procedures establish the level of protection afforded to exporters and producers

and importers and consumers. To ensure the validity of the sampling and testing procedures, they should be based on scientific and internationally accepted principles that can be applied fairly.

Committee on Food Additives
Comité sur les additifs alimentaires
Comité sobre Aditivos Alimentarios

Food Additive Provisions of the *General Standard for Food Additives* (GSFA) (CODEX STAN 192-1995), at Step 8 and 5/8 (REP13/FA para. 101, Appendix VI)

Comments of Norway and Philippines

NORWAY

Provisions for aluminium containing food additives for adoption on Step 5/8 and Step 8 of the Procedure

Norway supports reducing the use and the MLs of aluminium containing food additives. However, we are concerned as the content of Al-lakes in colours is not taken into account, the PTWI (provisional tolerable weekly intake) may still be exceeded. We would therefore like to make a general reservation to adoption of aluminium containing food additives until the content of aluminium in aluminium containing food colours is taken into account.

PHILIPPINES

The Philippines supports the adoption of the following food additives provisions:

Food category No.	Additive	INS	Max Level	Final Position
01.4.1 (Pasteurized cream (plain)	Carrageenan	407	GMP	Philippines supports the adoption at GMP – corresponds to CODEX STAN 288-1976 Rationale:Allowed in CODEX STAN 288-1976
	Processed Eucheuma Seaweed (PES)	407a	GMP	Philippines supports the adoption at GMP – corresponds to CODEX STAN 288-1976 Rationale: Allowed in CODEX STAN 288-1976
01.4.2 Sterilized and UHT creams, whipping and whipped creams, and reduced fat creams (plain	Carrageenan	407	GMP	Philippines supports the adoption at GMP – corresponds to CODEX STAN 288-1976 Rationale: Allowed in CODEX STAN 288-1976
	Processed Eucheuma Seaweed (PES)	407a	GMP	Philippines supports the adoption at GMP – corresponds to CODEX STAN 288-1976 Rationale: Allowed in CODEX STAN 288-1976
04.2.2.7 (Fermented vegetable (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera), seaweed products, excluding fermented soybean products of food categories 06.8.6, 06.8.7, 12.9.1, 12.9.2.1 and 12.9.2.3	Carrageenan	407	GMP	Philippines supports the adoption at GMP – corresponds to CODEX STAN 288-1976 Rationale: Allowed in CODEX STAN 223-2001

Proposed Draft Amendments to the *International Numbering System (INS) for Food Additives* (CAC/GL 36-1989), at Step 5/8 (REP13/FA para. 116, Appendix IX)

Comments of Philippines

PHILIPPINES

The Philippines supports the proposed draft amendments to the *International Numbering System* (INS) *for Food Additives* (CAC/GL 36-1989) at Step 5/8.

Rationale:

Proposals for changes to the INS are supported by justifications and INS functional classes are updated based on the 2012 version of CAC/GL 36-1989

Committee on Sugars
Comité sur les sucres
Comité sobre Azucar

Proposed Draft Standard for Non-centrifugated Dehydrated Sugar Cane Juice, at Step 5/8 (CL 2013/09-CS)

Comments of Brazil,Costa Rica, Kenya and United States of America

BRAZIL

Brazil recognizes that the present version of the Document elaborated by Colombia incorporated some improvements, but some adjustments are needed for a better understanding as well as its future application

In that sense we would like to express disagreement to the advancement of the document to Step 5/8 without incorporating the necessary adjustments to overcome bias and to reflect our most exported non centrifugal sugar – açúcar mascavo, and would like to present some general and specific comments for consideration.

General comments:

As previously said in our response to CL 2012-35, amending the title of the proposed Draft from "Codex Standard for Panela" to "Codex Standard for Non-Centrifugal Sugars" brings flexibility to the Standard, but may encompass a broad range of products that need to be suited and/or differentiated in the Standard to avoid bias.

We strongly suggest this differentiation to develop the standard for "Panela" as well as other products that may be loosely and/or wrongly related with "Panela", but do not share the same provisions and/or processing steps that need to be listed in the proposed Draft.

This is in line with other comments that mentioned the specificities and complexity of standardizing artisanal products as well as other comments that mentioned products not fitted in the provisions and/or product definition.

In that sense we would like to reassess the particularities of sugar process, and highlight that at this time Non-Centrifugal Sugars provisions should be better illustrated/detailed to reflect not only panela (solid and/or ground), but also sugars that have differentiated processing steps.

Specific Comments:

Current provision at the Proposed Draft Standard
1. **SCOPE** This standard applies to non-centrifugated dehydrated sugar cane juice, as defined in section 2, intended for human consumption, including for catering purposes or re-packaging if required, as well as to the product intended for further processing, where indicated.
Proposal
1. **SCOPE** This standard applies to non-centrifugated dehydrated sugar ~~cane juice~~, as defined in section 2, intended

for human consumption, including for catering purposes or re-packaging if required, as well as to the product intended for further processing, where indicated. **This Standard does not cover products obtained from the reconstitution of sugars.**

Rationale

Proposed changes are editorial but aligned with recent standards approved by other Codex Commodity Committees to keep text simple. Coverage and exempts of the Standard need to be listed at the Scope.

Non centrifugal sugars may be related with other raw material (e.g. Chilean Chancaca from *Beta vulgaris*).

Current provision at the Proposed Draft Standard

2. **PRODUCT DEFINITION**

"Non-centrifugated dehydrated sugar cane juice" is defined as the product, in any form or presentation, obtained from the evaporation of sugar cane juice *Saccharum officinarum L.*, which contains amorphous subhedral or anhedral microcrystals, invisible to the naked eye, which maintains its constituent elements, such as saccharose, glucose, fructose and minerals, and which is not obtained from the reconstitution of its elements (sugars).

Proposal

"Non-centrifugated dehydrated sugar ~~cane juice~~" is ~~defined as~~ the product ~~in any form or presentation,~~ obtained from the evaporation of sugar ~~cane~~ juice ~~*Saccharum officinarum L.*~~, **without centrifugation and non sulphited,** which contains ~~amorphous subhedral or anhedral~~ microcrystals, invisible to the naked eye, ~~which~~ **and** maintains its constituent elements, such as saccharose, glucose, fructose and minerals~~, and which is not obtained from the reconstitution of its elements (sugars)~~.:

(1) cooled without agitation and presented in solid form such as solid and/or compact rectangular cakes or chunks of variable sizes, and/or grinded to granulated form of presentation, e.g. Chancaca (Chile, Ecuador y Perú); Gur o Jaggery (India); Jaggery y Khandsari (Asia del Sur); Kokutou y kurozatou (Japón); Mascabado (Filipinas); Panela (Bolivia, Colombia, Honduras, Nicaragua, Panamá y otros); Papelón (Venezuela y algunos países de América Central); Piloncillo (México); Rapadura (Brasil y Cuba); Tapa de Dulce, Dulce Granulado (Costa Rica).,

(2) thoroughly agitated whilst cooling and presented in granulated form of presentation, e.g. açúcar mascavo (Brazil).

Rationale

Technical - Suggestion to Remove a provision

removal of "~~*Saccharum officinarum L.*~~," – as other species may be adopted to produce non centrifugal sugars. This is in line with Codex Stan 212-1999 that is not related with any raw material.

Editorial:

removal of "~~defined as~~" – as not a Codex language and already covered by the title of section 2 - Product definition.

Technical - Suggestion to Remove a provision

removal of "~~in any form of presentation~~" for clarity.

Technical - Suggestion to Insert a provision

Insert "**without centrifugation and non sulphited,"** to explicitly specify that non-centrifugal sugars do not undergo centrifugation and are not sulphated during process. Sulphite addition is not a processing step of non-centrifugal sugars and this should be highlighted on the proposed standard.

Technical - Suggestion to Remove a provision

removal of "~~amorphous subhedral or anhedral~~" to keep the standard simple, to reinforce the final statement of the Scope (as suggested bellow) not to allow reconstitution of the product from sugars and not to make

any confusion with CODEX STAN 212-1999, more related with the crystallized forms of Sugars. reallocation of "and is not obtained from the reconstitution of its elements (sugars)" to the Scope as this is more related to the limits of the Standard. Technical - Suggestion to Insert a provision to be more specific to the different processes that exist, differentiating such forms of presentation and those products related. Products from different products may need to be distributed in (1) or (2) as appropriate. Insert "**(1) cooled without agitation and presented in solid form such as solid and/or compact rectangular cakes or chunks of variable sizes, and/or grinded to granulated form of presentation, e.g. Chancaca (Chile, Ecuador y Perú); Gur o Jaggery (India); Jaggery y Khandsari (Asia del Sur); Kokutou y kurozatou (Japón); Mascabado (Filipinas); Panela (Bolivia, Colombia, Honduras, Nicaragua, Panamá y otros); Papelón (Venezuela y algunos países de América Central); Piloncillo (México); Rapadura (Brasil y Cuba); Tapa de Dulce, Dulce Granulado (Costa Rica).,** **(2) thoroughly agitated whilst cooling and presented in granulated form of presentation, e.g. açúcar mascavo (Brazil).**"

Current provision at the Proposed Draft Standard
3.2.1 **Colour** "Non-centrifugated dehydrated sugar cane juice" may exist in various colours characteristic of the product, depending, among other aspects, on the sugar cane variety, the agro-ecological conditions of cultivation and the technologies of the manufacturing process.
Proposal
3.2.1 **Colour** "Non-centrifugated dehydrated sugar cane juice" may **be light or dark brown to golden yellow in colour** ~~exist in various colours characteristic of the product,~~ depending, among other aspects, on the sugar cane variety, the agro-ecological conditions of cultivation and ~~the technologies of~~ the manufacturing process.
Rationale
To be more specific.

Current provision at the Proposed Draft Standard
3.2.4 **Physical and chemical characteristics** "Non-centrifugated dehydrated sugar cane juice" shall fulfil the conditions shown in tables 1 and 2, as appropriate.
Proposal
3.2.4 **Physical and chemical characteristics** "Non-centrifugated dehydrated sugar cane juice" shall **fulfill** the conditions shown in tables ~~1 and 2~~ **1, 2 and 3**, as appropriate.
Rationale
For consistency with our previous comments.

Current provision at the Proposed Draft Standard
Table1. Physical-chemical requirements for solid "non-centrifugated dehydrated sugar cane juice"
Table2. Physical-chemical requirements for solid "non-centrifugated dehydrated sugar cane juice"

granulated
Proposal
Table1~~.~~ Physical-chemical requirements for solid "non-centrifugated dehydrated sugar ~~cane juice~~" cooled without agitation **Table2~~.~~ Physical-chemical requirements for solid "non-centrifugated dehydrated sugar ~~cane juice~~" cooled without agitation and granulated** **Table3~~.~~ Physical-chemical requirements for solid "non-centrifugated dehydrated sugar ~~cane juice~~" thoroughly agitated whilst cooling and granulated**
Rationale
For consistency with our previous comments.

Table 1. Physical-chemical requirements for solid "non-centrifugated dehydrated sugar" cooled without agitation

	Current provision as Presented	Proposal
Ashes, mass fraction %	0.8 (mín)	**0.7** (mín)
Potassium mg/100 g	100.0 (mín)	**60.0** (mín)
Rationale		
Proposed values are needed to encompass Brazilian Rapadura. Besides that, we would like to propose that the units for Polarization should be expressed in °Z Total Sugars, Reducing sugars (glucose) and Ashes in %m/m Colour ICUMSA in UI		

Table 3. Physical-chemical requirements for solid "non-centrifugated dehydrated sugar" thoroughly agitated whilst cooling and granulated

	Mín	Máx
Moisture, Mass fraction%	--	5.0
Ashes, mass fraction %	1.0	2.4
Non-reducing sugars, mass fraction%	85 °Z (90%)	--
Reducing sugars, mass fraction%	2.0	6.0
Proteins% (N ×6.25)	0.2	--
Potassium mg/100 g	60.0	400
Calcium mg/100 g	50.0	350
Phosphorous mg/100 g	30.0	80.0
Iron mg/100 g	4.0	10.0
Rationale		
Proposed values are needed to encompass Brazilian Açúcar Mascavo. Besides that, we would like to propose that the units for Polarization should be expressed in °Z Total Sugars, Reducing sugars (glucose) and Ashes in %m/m // Colour ICUMSA in UI We reassess (for all tables) that the provisions should be based on ICUMSA methods and reinforce other country comments that setting only minimum values is not a current Codex procedure.		

Current provision at the Proposed Draft Standard		
5. PROCESSING AIDS		
Brazil would like to present for inclusion a suggestion for acidity regulators which are needed and currently used as processing aids for both rapadura and açúcar mascavo:		
4.1 ACIDITY REGULATORS INS No.	***Name of food additive***	***Maximum level***
INS 529	*Calcium oxide*	*GMP*
INS 170(i)	*Calcium carbonate*	*GMP*
INS 500 (i)	*Sodium carbonate*	*GMP*
INS 500 (ii)	*Sodium hidrogen carbonate*	*GMP*

COSTA RICA

Costa Rica, desea externar su agradecimiento a Colombia por el excelente trabajo realizado y agradece la oportunidad de emitir los siguientes comentarios:

1. Costa Rica propone las siguientes modificaciones al Cuadro 2. Requisitos físico químicos para el "jugo de caña de azúcar deshidratado no centrifugado" granulado, de la siguiente manera:

Requisito	**Min.**	**Max.**
Humedad, fracción en masa en %	-	5,0
Cenizas, fracción en masa en %	~~1,0~~ 0,5	-
Azucares totales (sacarosa) fracción en masa en %		93,0
Azucares reductores (glucosa) fracción en masa en %	3,0	7,0
Proteínas en % (Nx 6,25)	0,2	-
Potasio en mg/100g	50	-
Calcio en mg/100g	10,0	-
Fósforo en mg/100g	5,0	-
Hierro en mg/100g	1,5	-

Justificación: Estos valores son considerados importantes para Costa Rica, dado que son aportados por análisis realizados por la industria.

2. Costa Rica no estaría de acuerdo en eliminar la presentación granulada de la tapa dulce.

Justificación:

- tapa dulce granulada y la sólida, es el mismo producto sólo que llevan procesos diferentes para que las partículas de azúcar se solidifiquen y así se hace el producto granulado, pero parten de una misma materia prima. No se debe dejar el producto granulado por fuera de la norma ya que muchos países lo elaboran, incluyendo CR.

3. Uso de aditivos alimentarios:

- Costa Rica considera importante que se haga referencia a la Norma General de Aditivos del Codex.

KENYA

Kenya supports the adoption of the Standard at Step 5/8

UNITED STATES OF AMERICA

General Comments

At this time, the United States does not support the adoption of this document through the accelerated Step 5/8 process. We believe that there was not substantial consensus reached on the provisions of this document that would warrant an accelerated process of Step 5/8. Consequently this document, while a good effort by Colombia to meet the terms of reference, does not yet reflect a consensus document. Therefore, we propose retaining the document at Step 5 for further consideration and comment.

Specific Comments

Several countries, including the United States, submitted comments on various aspects of this standard that were not addressed in this document. These items are still of concern. Specifically:

- ***The International Commission for Uniform Methods of Sugar Analysis (***ICUMSA) analytical methods should be used. A number of countries, including the United States, commented that ICUMSA methods should be used rather than the Association of Official Analytical Chemists' (AOAC) methods. This proposed standard did not take into account the ICUMSA methods and lists only AOAC methods. The United States notes that comments were received relative to ICUMSA methods from the United States, Philippines, India, Chile, and Australia.

- We recognize that the ICUMSA methods for iron and sulfite are for white sugars, so they may not work as well for panela. However, the ICUMSA conductivity ash method would work and is much quicker, easier, less cumbersome, less equipment intensive, and safer than the AOAC ash method. In fact, ICUMSA did studies to show the equivalence of results between conductivity methods and ash methods. As far as we are aware, no studies were presented to show why the AOAC methods should be preferred over the ICUMSA methods. Additionally, all of the AOAC methods require a fair amount of advanced equipment which would rarely be available in a factory that makes panela. The United States suggests that this analytical methods issue should be referred to the Codex Committee on Methods of Analysis and Sampling (CCMAS) before further advancement of this document.

- The United States does not believe that a "granulated" form should be identified, that there should be two tables containing separate and different specifications for a "solid" and a "granulated" form, or that there should be a requirement for labeling panela as "solid" or "granulated" in Section 7.1. Specific forms appear for the first time in the headings of Tables 1 & 2 and there is no rationale for why there should be different specifications according to the form. The United States had previously recommended that the form "granulated" be removed. It would appear that the mere fact of being "granulated" contradicts the essential description that says the crystals are invisible to the naked eye. Granulated usually means the product is crystalline. Non-refined granulated sugars on the market today are called muscovado and demerrara, but do not have a standard by Codex. This could be confusing for producers and importers of those products.

- The United States notes that the two tables specify identical levels of protein, potassium, calcium and phosphorous for the "solid" and "granulated" forms and questions why these items are identical while sugar and moisture content are different. There is no discussion of any manufacturing process that would account for identical specifications in these parameters but with differing specifications in the other parameters. Since the levels of protein, potassium, calcium and phosphorous are not under the control of the manufacturer, we see no need for specifications for these items. With respect to the other items, we note that Table 1 contains a minimum level of iron for "solid" panela, while Table 2 for "granulated" panela contains no specification for iron. We question the reason for the difference. We also note that Table 2 contains a minimum "moisture, mass fraction %' for "granulated" panela while Table 1 for "solid" panela does not. We question the reason for the difference. These differences point out an issue with specifying different forms and having different specifications for each form.

- Since the standard covers product "in any form or presentation," there is no need for tables to specify different maximum and minimum characteristics for two and only two forms, i.e. "solid" and "granulated." There should be a single table that covers minimum and maximum values applicable to all panela in whatever form it appears.

- We note that there is an analytical method specified in Section 8 (Methods of Analysis Section) for sulfites. However, there are no specifications in the standard for maximum sulfite levels, nor is there any provision for the use of sulfites to make the product. Consequently, there should be no sulfites in the product. Absent any specification that would require an analysis for sulfite, a method for sulfites should not be specified in the analytical methods section.
- Several countries, including the United States, commented that the color section should identify the characteristic color as brown to golden brown.
- The term "raspadura" needs to be included. It is the name of the product in Panama and Cuba. The term "rapadura" is included but this is the Portuguese term used by Brazil.
- The term, "Non-Centrifugated Dehydrated Sugar Cane Juice." is excessively long and is not a common name for this sugar. It would be preferable to use the term "non-centrifugal sugar" as a name for this food. In any case, the term "centrifugated" is not an English term. This term should be replaced with the word "centrifuged" or "centrifugal" wherever it appears in the document.
- We also note that there is a section numbering issue beginning with Section 8 labeling. The subheadings in Section 8 should be labeled as 8.1 etc. rather than 7.1, etc. This continues to the methods section which should be labeled as Section 9 rather than Section 8.

Based on the above observations, we propose retaining the document at Step 5 for further consideration and comment.

Committee on Contaminants in Foods
Comité sur les contaminants dans les aliments
Comité sobre Contaminantes en los Alimentos

Proposed Draft Maximum Levels for Lead in Fruit Juices and Nectars, Ready-to-drink; Canned Fruits; and Canned Vegetables, at Step 5/8 (REP13/CF para. 42, Appendix II)

Comments of Costa Rica and FoodDrinkEurope

COSTA RICA

Costa Rica supports the adoption of the draft Maximum Levels for Lead at Step 5/8

FOODDRINKEUROPE

1. FoodDrinkEurope is concerned that for canned mushrooms, especially wild, the proposed 0.1ppm limit could create problems (the previous level of course being 1ppm). Mushrooms are a particular product absorbing much more than other products, moreover they are not cultivated (for cultivated products controls are easier). In the EU a maximum lead level has been set for cultivated mushrooms (Regulation 1881/2006, *Agaricus bisporus* (champignon de Paris), *Pleurotus ostreatus*, *Lentinula edodes* (Shiitake)) of 0.3 ppm; while for other mushrooms there is no limit. With this said, we would stress the need for an MRL of 0.3ppm.

2. Furthermore FoodDrinkEurope notes that tinned vegetables and non-tinned vegetables should have a harmonized Maximum Level since tin should no longer effect the level of lead contamination in foods.

Proposed Draft Maximum Level for Deoxynivalenol (DON) in Cereal-based Foods for Infants and Young Children, at Step 5/8 (REP13/CF para. 70, Appendix III)

Comments of Costa Rica and Norway

COSTA RICA

Costa Rica supports the adoption of the draft Maximum Level for DON at Step 5/8

NORWAY

Norway expressed our reservation to the proposed maximum level for DON at the 7th session of CCCF. We would like to reiterate our strong opposition to adopting this maximum level for DON. Our opposition is based on the following concern:

The proposed draft maximum level for deoxynivalenol (DON) in cereal-based foods for infants and young children is 0,2 mg/kg. **We recall it was proposed in the very late minute of the discussion** that this ML should apply to the commodity **as consumed,** whereas the ML proposed by the eWG at the 7th CCCF meeting, was given as 0.5 mg/kg **dry matter.**

In order to see the full consequence of what is now being proposed at step 5/8 we have made some calculations:

Using porridge as an example of cereal-based food as consumed, our estimations show that the proposed ML of 0,2 mg/kg **product as consumed** will correspond to an ML of approximately 1,0 mg/kg **dry matter**.

The Codex ML for DON in cereal-based foods for infants and small children (12-36 months) is thus twice as high as the ML proposed by the eWG and five times as high as the ML which according to the eWG, would be readily achievable. Based on available data on occurrence of DON in cereal-based infant foods, the eWG found that a very low percentage of the samples would exceed an ML set at 0.2 mg/kg dry matter.

Infants and young children are considered the most vulnerable group of the population in regards DON exposure in terms of the critical chronic toxicological effect of reduced growth/growth retardation and therefore it has been concluded that a lower level should be established. And we understand that this was the intention of CCCF as well.

We also question if the sampling plan is applicable for ready to eat products (not dry matter).

To conclude:

If the intention of having a separate ML for DON in cereal-based foods for infants and young children is to give this group extra protection, this will evidently not be achieved by the ML proposed for products as consumed. This ML gives the same level in the cereal based food ready to eat as the proposed draft ML for flour, semolina, meal, flakes (and possibly grits and starch) derived from wheat, maize or barley at step 5. And based on this we strongly oppose this ML and would suggest that CAC sends this proposal back to the CCCF to give the committee a chance to discuss the consequences of setting the ML "as consumed".

Background

The Norwegian Scientific Committee for Food Safety (VKM) published a comprehensive risk assessment on Mycotoxins in cereal grain 9 April 2013. http://www.vkm.no/dav/eee04d10c4.pdf The Scientific Committee found that even with concentrations, much lower than the MLs now proposed by CCCF, there is reason to be concerned about the intake of DON, in particular the intake among children.

Proposed Draft Code of Practice for the Prevention and Reduction of Ochratoxin A Contamination in Cocoa, at Step 5/8 (REP13/CF para. 79, Appendix IV)

Comments of Colombia and Costa Rica

Costa Rica supports the adoption of the draft Code of Practice at Step 5/8

COLOMBIA

Colombia tiene el agrado de presentar los siguientes comentarios:

Se sugieren cambios de redacción y/o digitación en los textos de los siguientes párrafos del documento:

Párrafo 15. La pulpa y las semillas de cacao son microbiológicamente estériles ~~con relación a los hongos productores de OTA~~ cuando están dentro de una vaina de cacao sana. La contaminación ~~de~~ con esporas de ~~hongos~~ mohos que pueden producir OTA se ~~produce~~ origina durante el proceso de apertura de la vaina de cacao y en los procesos posteriores.

Observación. Las semillas de cacao y su pulpa son microbiológicamente estériles cuando la vaina está intacta no solo para hongos sino otros patógenos.

Párrafo 18. Los frutos del cacao deberán cosecharse tan pronto como estén maduros. La recolección debe llevarse a cabo todas las semanas durante los períodos de máxima actividad y cada dos semanas en los períodos de actividad menor. Del mismo modo, es importante hacer una ronda de la higiene de la granja todas las semanas para eliminar los frutos de cacao enfermos con un machete, "bolo" o media luna, que sólo

se utilizan para ese fin**, el cual deber ser lavado y desinfectado posterior a su uso.** Sepárense las vainas enfermas de las sanas en el campo para evitar la contaminación durante el transporte y el almacenamiento.

Observación. Es importante aplicar medidas de desinfección para reducir la posibilidad de contaminación a través de las herramientas de corte a frutos de cacao sanos por contacto con frutos enfermos.

Párrafo 26. Las semillas de cacao con la pulpa se colocarán en cajas, canastas, bandejas o plataformas adecuadas, razonablemente limpias y secas para la fermentación. **Adicionalmente, se recomienda que las cajas, canastas o bandejas tengan orificios en el fondo para la salida de los lixiviados que se desprenden del mucílago. Estos cajones deben colocarse a unos 10 a 15 centímetros por encima del suelo para facilitar el drenaje de estos líquidos.** Se tendrá cuidado de evitar que los granos de cacao entren en contacto con agua durante la fermentación.

Observación. Estas medidas favorecen la eliminación de lixiviados productos de la fermentación y reducen condiciones de humedad en los contenedores para la formación de hongos ocratoxigénicos. A su vez, no se recomienda el uso de recipientes de materiales plásticos durante la fermentación ya que no permiten la adecuada aireación de los granos.

Ítem. 4.6. Almacenamiento, transporte y comercialización de los granos secos de cacao.

Se recomienda establecer un límite máximo de contenido de moho en los granos de cacao a almacenar; para el caso de Colombia es del 2% en Cacao Corriente.

Observación. El establecimiento de este límite máximo de contenido de moho en los granos de cacao a almacenar reduce la formación de hongos ocratoxigénicos.

Párrafo 45. "Los granos de cacao deben ser envasados en sacos limpios que son suficientemente fuertes y debidamente cosidos o sellados para soportar el transporte y almacenamiento y que son adecuados para su uso en contacto con alimentos y desalentar la infestación de plagas."

Comentario. Vale la pena complementar que los sacos deben permitir el intercambio gaseoso para lo cual se utiliza sacos de fique o yute. No pueden ser completamente sellados.

Proposed Draft Code of Practice for the Reduction of Hydrocyanic Acid in Cassava and Cassava Products, at Step 5/8 (REP13/CF para. 92, Appendix VI)

Comments of Costa Rica

COSTA RICA

Costa Rica supports the adoption of the draft Code of Practice at Step 5/8

Committee on Pesticide Residues
Comité sur les résidus de pesticides
Comité sobre Residuos de Plaguicidas

Draft Maximum Residue Limits for Pesticides, at Step 8 and 5/8 (REP13/PR paras. 17-90, Appendices II and III)

Comments of Canada, Colombia, Costa Rica, European Union and Norway

Canada and Costa Rica support the adoption of the Draft Maximum Residue Limits for Pesticides at Step 8 and 5/8

COLOMBIA

En la tabla adjunta Colombia presenta reserva con relación a los LMR en la combinación ingrediente activo – alimento con base en la estimación de la ingesta de la población colombiana, basada en los datos reportados en la Encuesta Nacional Sobre la Nutrición en Colombia (ENSIN), año 2005 y el Perfil Nacional de Consumo de Frutas y Verduras 2013, desarrolladas por el Instituto Colombiano de Bienestar Familiar y el Ministerio de Salud y Protección Social, respectivamente.

PLAGUICIDA	Alimento	MRL (mg/kg)	consumo g/dia/ persona	IDA mg/kg pc	peso corporal kg	DOSIS MAXIMA SEGURA mg	exposicion por consumo mg/persona	% IDA
diclorvos	arroz	7	189,4	0,004	65	0,26	1,3258	509,9%
Chlorothalonil	banano	15	113,1	0,02	65	1,3	1,6965	130,5%
	acelga	50	20				1	76,9%
phorate	papa	0,3	230,8	0,0007	65	0,0455	0,06924	152,2%
Fenvalerate	mango	1,5	174,7	0,02	65	1,3	0,26205	20,2%
Cyfluthrin/beta-cyfluthrin	carne	0,2	58	0,04	65	2,6	0,0116	29,0%
Glufosinate-Ammonium	carne	0,05	58	0,01	65	0,65	0,0029	29,0%
	cebolla cabezona	0,05	31,8				0,00159	15,9%
	arroz	0,9	189,4				0,17046	26,2%
Cycloxydim	huevos	0,15	64,8	0,07	65	4,55	0,00972	13,9%
	lechuga	1,5	12				0,018	25,7%
	maiz	0,2	87,5				0,0175	25,0%
	arveja seca	30	48,9				1,467	32,2%
	papa	3	230,8				0,6924	15,2%
	arroz	0,09	189,4				0,017046	24,4%
Methoxyfenozide	carne	0,3	58	0,1	65	6,5	0,0174	17,4%
Fluopyram	banano	0,8	113,1	0,01	65	0,65	0,09048	13,9%
	leche	0,3	235,2				0,07056	10,9%
Sulfoxaflor	repollo	0,4	16,5	0,05	65	3,25	0,0066	13,2%
	huevos	0,1	64,8				0,00648	13,0%
	pollo	0,1	68				0,0068	13,6%
Penthiopyrad	zanahoria	0,6	16,7	0,1	65	6,5	0,01002	10,0%
	cucurbitaceas	0,5	49,1				0,02455	24,6%
	papa	0,05	230,8				0,01154	11,5%
Dinotefuran	repollo	2	16,5	0,2	65	13	0,033	16,5%
	cucurbitaceas	0,5	49,1				0,02455	12,3%
	leche	0,1	235,2				0,02352	11,8%
	arroz	8	189,4				1,5152	11,7%
Fluxapyroxad	leche	0,02	235,2	0,02	65	1,3	0,004704	23,5%

Lo anterior soportado en que la evaluación de la exposición para los consumos nacionales de los diferentes alimentos son superiores a los establecidos en las dietas promediadas del SIMUVIMA, y por lo tanto los LMR propuestos no se consideran seguros, presentándose así una preocupación para la salud pública de la población colombiana.

Finalmente, se debe tener presente que Colombia está suscribiendo acuerdos comerciales con otros países aumentando la probabilidad de que ingresen productos de alto consumo nacional tales como arroz, papa, tomate, entre otros; que aún en cumplimiento de los LMR propuestos por Codex Alimentarius para estos plaguicidas, en su conjunto, podrían superar la ingesta diaria admisible.

EUROPEAN UNION

DRAFT MAXIMUM RESIDUE LIMITS FOR PESTICIDES AT STEP 8 (Paras 17-90 and Appendix II of REP 13/PR)

The EU supports the adoption of all the draft MRLs in Appendix II of REP 13/PR with the exception of the draft MRLs for the substances/commodities below for which the EU requests that its reservations are included in the report of CAC 36.

- **130 Diflubenzuron**: The EU does not support the adoption of the draft MRLs due to potential carcinogenicity and genotoxicity of certain metabolites of diflubenzuron for which reason the substance is subject to re-assessment in the EU.
- **176 Hexythiazox**: The EU does not support the adoption of the draft MRL for **strawberry** because of concerns regarding the toxicological profile of metabolite PT-1-3 and the behaviour of metabolites during processing.

PROPOSED DRAFT MAXIMUM RESIDUE LIMITS FOR PESTICIDES AT STEP 5/8 (with omission of Steps 6/7) ((Paras 17-90 and Appendix III of REP 13/PR)

The EU supports the adoption of all the proposed draft MRLs in Appendix III of REP 13/PR with the exception of the draft MRLs for the substances/commodities below for which the EU requests that its reservations are included in the report of CAC 36.

- **25 Dichlorvos**: The EU does not support the adoption of proposed draft MRLs for **eggs; poultry, edible offal of; poultry fats; poultry meat; rice and wheat** because of a methodological disagreement about the use of human studies for deriving the ADI and ARfD, a missing metabolism study in poultry reflecting oral exposure and because JMPR did not assess the nature of residues in processed commodities. For rice and wheat, the proposed drafts MRLs also raise intake concerns.

- **26 Dicofol**: The EU does not support the adoption of proposed draft MRL for **tea, green, black** because of the possible generation **of** chloroform in tea infusions.
- **81 Chlorothalonil**: The EU does not support the adoption of proposed draft MRLs for **banana and chard** because there is no information on the concentration of the SDS-3701 metabolite which has significantly lower ARfD than the parent compound.
- **112 Phorate**: The EU does not support the adoption of proposed draft MRL for **potato** because of the possible presence of formaldehyde as a degradation product.
- **119 Fenvalerate**: The EU does not support the adoption of proposed draft MRL for **Chinese broccoli** because of acute intake concerns considering the consumption of broccoli, which is the crop to which the MRL would apply at EU level.
- **169 Cyromazine**: The EU does not support the adoption of proposed draft MRLs for **chick-pea (dry); lentil (dry); and lupin (dry)** because of the possible presence of metabolite melamine and a missing metabolism study on a third representative crop group, e.g. pulses. A separate risk assessment for melamine is required.
- **173 Buprofezin**: The EU does not support the adoption of proposed draft MRL for **tea, green** because of insufficient number of residue trials and the potential formation of degradation products in tea infusions.
- **175 Glufosinate-Ammonium**: The EU does not support the adoption of proposed draft MRLs for the **assorted tropical and subtropical fruits, edible peel; assorted tropical and subtropical fruits, inedible peel** because according to extrapolation rules agreed by CCPR the data would not be sufficient to set a MRL for the whole group. The EU does not support the adoption of proposed draft MRL for **currants, black, red, white** because the data package used to derive the MRL proposals is very inconsistent. The EU does not support the adoption of proposed draft MRL for **potato** because the residue trials reflecting alternative GAPs differed significantly and acute intake concerns were identified in certain cases. The EU does not support the adoption of proposed draft MRL for **stone fruits** because the data package would allow deriving lower MRLs for certain individual crops (cherries and peaches/nectarines).
- **179 Cycloxydim**: The EU does not support the adoption of proposed draft MRL for **brassica (cole or cabbage) vegetables, head cabbage, flowerhead brassicas** because the available data would allow deriving lower MRLs for certain individual crops (flowering brassica and head brassicas). The EU does not support the adoption of proposed draft MRL for **eggs** because a lower MRL would be derived from the feeding study.
- **206 Imidacloprid**: The EU does not support the adoption of proposed draft MRL for **celery** due to acute intake concerns.
- **209 Methoxyfenozide**: The EU does not support the adoption of proposed draft MRL for **fruiting vegetables, cucurbits** because the dataset did not fulfil the principles for the use of the proportionality concept.
- **233 Spinetoram**: The EU does not support the adoption of proposed draft MRLs for **celery and spinach** due to acute intake concerns. The EU does not support the adoption of proposed draft MRL for **brassica vegetables** because of uncertainties caused by extrapolation.
- **251 Saflufenacil**: The EU does not support the adoption of proposed draft MRL for **pulses** because sufficient data are available to establish separate MRLs at a lower level for different types of pulses.
- **252 Sulfoxaflor**: The EU does not support the adoption of proposed draft MRLs because the substance is still under evaluation in the EU.
- **253 Penthiopyrad**: The EU does not support the adoption of proposed draft MRLs for **flowerhead brassicas; stone fruits; and leafy vegetables (except brassica leafy vegetables)** because of a methodological disagreement concerning extrapolation and an acute intake concern for scarole in the group of leafy vegetables.

- **255 Dinotefuran**: The EU does not support the adoption of proposed draft MRLs for **brassicas; fruiting vegatables, cucurbits; fruiting vegetables other than cucurbits and leafy vegetables except water cress** because of a methodological disagreement concerning extrapolation.
- **256 Fluxapyroxad**: The EU does not support the adoption of proposed draft **stone fruits group MRL** because of a methodological disagreement concerning extrapolation.
- **260 Ametoctradin**: The EU does not support the adoption of proposed draft MRLs for **brassica (cole or cabbage) vegetables, head cabbage, flowerhead brassicas; leafy vegetables** because of a methodological disagreement concerning extrapolation. The EU does not support the adoption of proposed draft MRL for **spring onion** because of inadequate number of field trials.

NORWAY

Draft Maximum Residue limits for Pesticides at step 8 (Appendix II)

Norway supports the adoption at step 8 of all draft MRLs in appendix II of REP 13/PR with the exception of the Draft MRLs for:

- Diflubenzuron (130)
- Hexythiazox (176) for strawberry

Draft Maximum Residue limits for Pesticides at step 5/8 (Appendix III)

Norway supports the adoption at step 5/8 of all draft MRLs in app III of REP 13/PR, with the exception of the Draft MRLs for

- Dichlorvos (025) for eggs; poultry, edible offal of; poultry fats; poultry meat; rice and wheat.
- Dicofol (026) for tea, green, black.
- Chlorothalonil (081) for banana and chard.
- Phorate (112) for potato.
- Fenvalerate (119) for chinese broccoli
- Cyromazine (169)
- Buprofezin (173) for tea, green.
- Glufosinate-Ammonium (175) for the assorted tropical and subtropical fruits, edible peel; assorted tropical and subtropical fruits, inedible peel; currants, black, red, white; potato and stone fruits.
- Cycloxydim (179) for brassica (cole or cabbage) vegetables, head cabbage, flowerhead brassicas and eggs.
- Imidacloprid (206) for celery.
- Methoxyfenozide (209) for fruiting vegetables, cucurbits.
- Spinetoram (233) for celery; spinach and brassica vegetables.
- Saflufenacil (251)
- Sulfoxaflor (252)
- Penthiopyrad (253) for flowerhead brassicas; stone fruits; and leafy vegetables (except brassica leafy vegetables).
- Dinotefuran (255) for brassicas; fruiting vegatables, cucubits; fruiting vegetables other than cucurbits and leafy vegetables.
- Fluxapyroxad (256) for the stone fruits group MRL.
- Ametoctradin (260) for brassica (cole or cabbage) vegetables, head cabbage, flowerhead brassicas; leafy vegetables and spring onion.

PART 2 - OTHER STANDARDS AND RELATED TEXTS SUBMITTED FOR ADOPTION

Committee on Fish and Fish Products
Comité sur les poissons et les produits de la pêche
Comité sobre Pescado y Productos Pesqueros

Amendments to sections I-6.5, I-8.5 and II-8.7 of the *Standard for Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008) and Sections 7.1 and 7.2.2.2 to the *Code of Practice for Fish and Fishery Products* (CAC/RCP52 – 2003) (REP13/FFP paras 12 and 40, Appendix II)

Comments of Philippines

PHILIPPINES

The Philippines supports the amendments to the *Standard for Live and Raw Bivalve Molluscs* (sections I-6.5, I-8.5 and II-8.7) and the *Code of Practice for Fish and Fishery Products* (section 7.2.2.2) to the 36th Session of the Commission for adoption.

Committee on Food Import and Export Inspection and Certification Systems
Comité sur les systèmes d'inspection et de certification des importations et des exportations alimentaires
Comité sobre Sistemas de Inspección y Certificación de Importaciones y Exportaciones de Alimentos

Amendments to *Guidelines for the Exchange of Information in Food Safety Emergency Situations* (CAC/GL 19-1995) (REP13/FICS para. 58, Appendix III)

Comments of Philippines

PHILIPPINES

The Philippines supports the Committee decision to forward the draft amendments to the 36th CAC Session for adoption.

Rationale:

The Philippines believes that Codex concern for feeds should only be related to food safety.

Committee on Methods of Analysis and Sampling
Comité sur les méthodes d'analyse et d'échantillonnage
Comité sobre Métodos de Análisis y Toma de Muestras

Methods of Analysis in Codex Standards at Different Steps (REP13/MAS para. 16-54, Appendix II)

Comments of Philippines

PHILIPPINES

The Philippines supports the adoption of the Methods of Analysis at Different Steps of the Procedure.

Committee on Contaminants in Foods
Comité sur les contaminants dans les aliments
Comité sobre Contaminantes en los Alimentos

Consequential Amendments to the *Standards for Edible Cassava Flour, Gari* and *Sweet Cassava* (REP13/CF para. 88, Appendix V)

Comments of Costa Rica

COSTA RICA

Costa Rica supports the consequential Amendments to the Standards

Committee on Pesticide Residues
Comité sur les résidus de pesticides
Comité sobre Residuos de Plaguicidas

Consequential Amendments to the Maximum Residue Limits for Pesticides for Fruit Commodity Groups due to Revision of the *Classification of Food and Feed* as per these Commodity Groups (REP13/PR Para. 110, Appendix XIII)

Comments of Canada

CANADA

Canada supports the adoption of the consequential Amendments to the Maximum Residue Limits for Pesticides

Committee on Food Labelling
Comité du Codex sur l'étiquetage des denrées alimentaires
Comité del Codex sobre Etiquetado de los Alimentos

Draft amendments to the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997) concerning Non-Addition of Sodium Salts (Para. 41, and Appendix II) at Step 8

Comments of Costa Rica

COSTA RICA

Costa Rica supports the adoption of the Amendments to the Guidelines at Step 8

Proposed Draft amendments to the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods concerning use of ethylene as sprouting inhibitor for Onions and Potatoes (Para. 69 and Appendix IV) at Step 5/8

Comments of Costa Rica

COSTA RICA

Costa Rica supports the adoption of the Amendments to the Guidelines at Step 5/8.