

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of  
the United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

**Agenda Item 5**

**CX/CAC 13/36/4**

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**Original Language Only**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

**36<sup>th</sup> Session, FAO Headquarters**

**Rome, Italy, 1-5 July 2013**

### COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED TO THE COMMISSION FOR ADOPTION

**(Comments submitted by 10 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 Egypt*

*Comments of Egypt*

Egypt supports the adoption of the draft Standard at Step 8.

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 Egypt*

Egypt supports the adoption of the draft Provisions Standard at Step 8.

Egypt supports the adoption of the draft Provisions for Uniformity Rules and Other Size-Related Provisions (Sections 5.1 – Uniformity and 6.2.4 – Commercial Identification) in the draft Standard at Step 8. Draft Standard for Pomegranate, at Step 8 (REP13/FFV para. 53 and Appendix III)

*Comments of Egypt*

Egypt supports the adoption of the draft Standard at Step 8.

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 Egypt*

Egypt supports the adoption of the proposed draft Provisions, at Step 5/8.

**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 Cuba, Egypt, European Union, France*

**CUBA**

Cuba supports the adoption of the draft Standard at Step 8.

**EGYPT**

**1-SCOPE**

**The draft text (first line)**

This standard applies to smoked, smoke-flavored and smoke-dried fish prepared from fresh, chilled or frozen raw materials.

**The proposed statement.**

This standard applies to smoked, smoke-flavored and smoke-dried fish prepared from **fatty and semi-fatty** fresh, chilled or frozen raw materials.

**2- DESCRIPTION**

**The draft text (first line)**

Product and process definitions for smoked fish, smoke-flavored fish and smoke-dried fish are considered separately under this section.

**The proposed statement.**

Product and process definitions for **salted or unsalted** smoked fish, smoke-flavored fish and smoke-dried fish are considered separately under this section.

**2.1.2 process definitions under SMOKED FISH**

**The draft text (first line)**

"Smoking" is a process of treating fish by exposing it to smoke from smoldering wood or plant materials.

**The proposed statement.**

"Smoking" is a process of treating fish by exposing it to smoke from **incomplete combustion of** smoldering wood or plant materials.

**2.1.2 process definitions under SMOKED FISH**

**The draft text under hot smoking**

Hot smoking is generally sufficient to kill parasites, to destroy non-sporulated bacterial pathogens and to injure spores of human health concern.

**The proposed statement**

Hot smoking is generally sufficient to kill parasites, **and its larval stage** to destroy non-sporulated bacterial pathogens and to injure spores of human health concern.

**2.1.2 process definitions under SMOKED FISH**

**The draft text**

"Cold smoking" is a process of treating fish with smoke using a time/ temperature combination that will not cause significant coagulation of the proteins in the fish flesh

**The proposed statement**

"**Cold smoking**" is a process of treating fish with smoke using a time/ temperature combination that will not cause **complete** coagulation of the proteins in the fish flash

**2.1.2 process definitions under SMOKED FISH****The draft text**

"**Salting**" is a process of treating fish with salt of food grade quality

**The proposed statement**

"**Salting**" is a process of treating fish with salt (**sodium chloride or saline solution**) of food grade quality

**2.1.2 process definitions under SMOKED FISH****The draft text**

"**Drying**" is a process in which the moisture content in the fish is decreased to appropriate required characteristics

**The proposed statement**

"**Drying**" is a process in which the moisture content in the fish is decreased to **max. 0.85 water activity or to** appropriate required characteristics

**2.1.2 process definitions under SMOKED FISH****The draft text**

"**Storage**" is a process in which smoked fish is kept refrigerated or frozen.

**The proposed statement**

"**Storage**" is a process in which smoked fish is kept **under ambient condition for short time or** refrigerated or frozen.

**2.2.2 process definition under SMOKE-FLOVORD FISH****The draft text**

"**Smoke flavors**" are either smoke condensates or artificial flavor blend prepared by mixing chemically defined substances in known amounts or any combination of both

**The proposed statement**

"**Smoke flavors**" are either smoke condensates or artificial flavor blend prepared by mixing chemically defined substances in known **permitted** amounts or any combination of both

**2.2.2 process definition under SMOKE-FLOVORD FISH****The draft text**

"**Storage**" is a process in which smoked- flavored fish is kept refrigerated or frozen.

**The proposed statement**

"**Storage**" is a process in which smoked- flavored fish is kept **under ambient condition for short time or** refrigerated or frozen.

**2.2.2 process definition under SMOKE-FLOVORD FISH****The draft text**

"**Drying**" is a process in which the moisture content in the fish is decreased to appropriate required characteristics

**The proposed statement**

"**Drying**" is a process in which the moisture content in the fish is decreased to **max. 0.85 water activity or to** appropriate required characteristics

### 2.2.2 process definition under SMOKE-FLOVORD FISH

#### The draft text

"Salting" is a process of treating fish with salt of food grade quality

#### The proposed statement

"Salting" is a process of treating fish with salt (sodium chloride or saline solution) of food grade quality

### 2.3.2 process definition under SMOKE-DRIED FISH

#### The draft text

"Salting" is a process of treating fish with salt of food grade quality

#### The proposed statement

"Salting" is a process of treating fish with salt (sodium chloride or saline solution) of food grade quality

### 2.3.2 process definition under SMOKE-DRIED FISH

#### The draft text

"Storage" is a process in which smoke-dried fish is typically kept at ambient temperature in a way to assure its' safety and quality in conformity with section 3 and 6

#### The proposed statement

"Storage" is a process in which smoke-dried fish is typically kept at under ambient condition for short time, or kept refrigerated or frozen in a way to assure its' safety and quality in conformity with section 3 and 6.

### 3.3. Wood or other plant materials for generation of smoke

#### The draft text

Wood or other plant material used for the generation of smoke or smoke-condensates must not be toxic substances.

#### The proposed statement

Hard wood or other plant material used for the generation of smoke or smoke-condensates must not be toxic substances.

### 5.2. Polycyclic Aromatic Hydrocarbons (PAH)

#### The draft text

Smoking of fish should be done in a manner that minimizes the formation of polycyclic aromatic hydrocarbons (PAH).

#### The proposed statement

Smoking of fish should be done in a manner that minimizes the formation of polycyclic aromatic hydrocarbons (PAH) up to a limit not causes any hazards for human health, or up to a safe limit.

### 6.3. Parasites

#### The draft text

Products covered by this standard shall not contain living parasites and a particular attention needs to be paid to cold smoked or smoke-flavored products,

#### The proposed statement

Products covered by this standard shall not contain living parasites or its larva stages in fish muscles and a particular attention needs to be paid to cold smoked or smoke-flavored products,

## 6.7 other substances

### The draft text

The products shall not contain any other substance in amounts, which may present a hazard to health

### The proposed statement

The products shall not contain any other substance in amounts, which may present a hazard to human health

## 9.2. Parasites

### The draft text

The presence of two or more visible parasites per kg of the sample unit detected by the method described in 8.11 with a capsular diameter greater than 3mm or a parasite not encapsulated and greater than 10mm in length,

### The proposed statement

The presence of two or more visible parasites per kg of the sample unit detected by the method described in 8.11 with a capsular diameter greater than 3mm or a parasite not encapsulated and greater than 10mm in length. **(Visible parasites and its' larva not permitted in the fish muscles)**

## EUROPEAN UNION

The EU supports the adoption of the draft Standard for Smoked fish, Smoke-flavoured fish and Smoke-dried fish.

However, the EU would like to introduce its reservation to the use of Sunset Yellow FCF (INS 110); 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.

## FRANCE

Annexe 1 : procédures suffisantes pour tuer les parasites  
congélation à - x°C ~~au centre thermique~~ **à cœur** pendant x h

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 Cuba, Egypt, France*

Cuba supports the adoption of the Draft Standard at Step 8.

## EGYPT

### General comments :

Egypt appreciates the opportunity to comment on this document and wishes to present her comments as follows :

#### 1- Scope:

Egypt would like to ask if Roe of abalone is included with viscera or completely detached ?

#### \* Justification :

Roe of Abalone may be a source of Marine biotoxins that should be put in consideration during (Sampling , examination and analysis) I-8 .

1-2-1

Egypt's would prefer to add to the product definition that live Abalone are products that are alive immediately prior to direct consumption or further processing .

**\* Justification :**

For consistency with the scope that mentioned both cases direct consumption and further processing .

1-2-2

Egypt suggests to exchange the statement under item 1-2-2 :

To be : They may be purged in potable water or clean sea water and drained prior to packaging .

**\* Justification :**

Abalone is one of filter feeder mollusks that accumulate a lot of harmful substances with the potential to harm the consumer so, it is recommended to relay the abalone in clean water, sea water to be purified then drain as one of the controlling measures to reduce the risk .

- Under items : 1-3-1 & 1-3-2

It's Egypt's view to merge these two items in one item 1-3-1 & 1-3-2

**\* Justification :**

Both of these items are about the same thing without any difference between Abalone and final product, therefore keeping them as separate items would contribute to misleading .

- Under items 1-6-1 & 1-6-2

(1) Egypt proposes establishing limits for *vibrio parahaemolyticus* and *vibrio cholera* for the final product as E.coli & Salmonella Concerning (Codex standard 292-2008)

**\* Justification :**

*Vibrio parahaemolyticus* , *V.Cholera* are pathogens of public health importance that constitutes potential hazard to seafood consumers specially those products that are intended to be used raw or slightly cooked which in fact is common in such products .

- (2) under the same item (1-6)

Egypt would like to enquire information about (AVG) Abalone virus ganglioneuritis with regard to its zoonotic importance and if it influence the aquaculture.

1-2.3 Egypt considers establishing size grades for Abalone forward in both of 1-2.3 & 1-7.2 (content declaration )

**\* Justification :**

Such size grades as : very large , large medium, small or very small as established for some shrimp products would be of great help to assess the quality of the product and avoid fraud .

1.7-1.3 & II-7.1.3

Egypt finds the inclusion of the scientific name beside any common or traditional name is essential and to be declared on the label to prevent misleading .

1-7.2

If suggestion of size grading of Abalone is accepted , Egypt recommends attaching it to the label .

1.8 Egypt formally suggests determination of Biogenic amines (histamine ) in abalone samples (1.8.5)

**\* Justification :**

Abalone is one of the sea foods that has the risk of containing high levels of histidine that may be turned to histamin

Ref : ORA (Laboratory manual , FDA office of Regulatory affairs, office of Regulatory science . Vol. IV orientation & trainiy .

1.8 (Parasite )

Egypt suggest addition of new item 1.6.4

1.6.4 The final product must be free from parasites that poses threat to human health .

II.9 Egypt would like to draw the attention that distinct objectionable odour & flavor that indicate decomposition, rancidity or other odours & flavour, unfit for food should not be considered as defectives , but as sensory & quality criteria and therefore be classified as essential category. as that conflicts with both item II-6 & II- 3.1 .

#### **FRANCE**

##### II-2.2

On considérera que le procédé de surgélation n'est pas achevé tant que la température du produit n'a pas atteint une température inférieure ou égale à  $-18^{\circ}\text{C}$ , ~~au centre thermique à cœur,~~ après stabilisation thermique.

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

#### *Comments of Cuba, Egypt*

Cuba and Egypt supports the adoption of the Draft Amendment at Step 5/8.

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 Brazil, Cuba, Egypt*

Cuba supports the adoption of the Draft Revision at Step 5/8.

#### **BRAZIL**

**Suggestion:** Section 1. Scope. Brazil suggests to change the text as follow:

*“ This procedure for inclusion applies to the relevant standards falling within the mandate of the CCFFP. The aim of the procedure is to enable new species to be included in the existing standards following a simple and harmonised approach. This procedure does not apply to ~~species currently included in a standard or~~ species dedicated for the non-food industry”*

**Rationale:** As stated in Paragraph 104 from REP11/FFP: “substantial work had already been carried out on the revision and should not be discontinued as the current procedure was not adequate and it was essential to ensure the scientific basis of the process, as well as transparency and fairness to all member states, taking into account the importance of a well designed procedure for exporting countries.”. Therefore, these procedures should be applied even to reaffirm the species currently included in a standard.

#### **EGYPT**

Egypt agrees with addition of the following:

##### 2.1 PROPOSING MEMBER

- Proposes three species if available the most.....

##### 3-3 PRINCIPLES OF THE SENSORY EVALUATION PROCEDURE

.....the proposing member proposes the 3 species if available to be compared.....

**Committee on Processed Fruits and Vegetables**  
**Comité sur les fruits et légumes traités**  
**Comité sobre sobre Frutas y Hortalizas Elaboradas**

Proposed Draft Standard for Table Olives (revision of CODEX STAN 66-1981), at Step 5/8 (REP13/PFV para. 38, Appendix II)

*Comments of Egypt*

Egypt support the adoption of the draft Standard at Step 5/8.

**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 Brazil, Canada, Costa Rica, Egypt*

Brazil, Canada, Costa Rica and Egypt support the adoption of the draft Principles and Guidelines at Step 5/8.

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 Argentina, Brazil, Canada, Costa Rica, Egypt*

Canada, Egypt support adoption of the draft Annex at Step 5/8.

**ARGENTINA**

Argentina agrees with the main text of the document and we will only submit some specific comments.

(i) General comments:

- We suggest that the form of the verb *poder* “*podiera*” be replaced with “*podría*” (Condicional *simple*) throughout the Spanish version.
- We suggest to check the numbering system, since we note numbering inconsistencies: e.g. from 3.2 to 3.2.1.1, from 3.2.1.2 to 3.2.3, from 3.3.1 to 3.3.3, among others.

(ii) Specific comments:

In the **INTRODUCTION** we suggest the following changes in some terms and expressions, in order to achieve an appropriate wording and facilitate understanding of the Spanish text.

**Paragraph 1:** Los cultivos de bayas **presentan** cuentan con una gran diversidad geográfica y engloban a un amplio rango de **especies cuyas** frutas **tienen** con rasgos fenotípicos únicos. No sólo ~~tienen frutos~~ ~~son~~ **diversas** ~~diversos~~ tamaños, formas y colores ~~de sus frutos~~, sino también cuentan con una gran variedad ~~hortícola horticultural~~, desde las bayas que crecen **al ras del suelo** ~~raso~~ (por ej., las fresas), hasta las que crecen en arbustos pequeños (por ej., las zarzamoras, moras, frambuesas), en arbustos grandes (por ej., grosellas, uchuva). Todas son plantas perennes pero algunas son cultivadas como anuales (por ej., las fresas);

N.B.: In addition, we wish to clarify that the common name “moras” in Spanish is used for the fruit of the *Morus alba* species or white mulberry, which is a tree species. Therefore, we consider it appropriate to introduce this alternative.

**In Scope**

We suggest to consider only the genre of berries, since there are many species within it, some of them resulting from cases of out-crossed berries. Therefore, the wording should read as follows:



“This Annex encompasses all edible varieties of strawberries (i.e. *Fragaria spp.*), raspberries (i.e. *Rubus idaeus* L.), blackberries (i.e. *Rubus* spp.), mulberries (i.e. *Morus* L.), blueberries (i.e. *Vaccinium* spp.), currants and gooseberries and groundcherries (i.e. *Physalis peruviana* L.)”

### In 3.1.1 Location of the production site

We suggest that the term “cartografía” in Spanish be replaced with “topografía”, as the latter conveys the intended meaning:

Paragraph 1:...” Los productores deberían tomar medidas para reducir los riesgos asociados ~~con la escorrentía~~ **con el escurrimiento** y las inundaciones, por ej., la **topografía** ~~cartografía~~ del campo de producción, la construcción de terraplenes y zanjas poco profundas para prevenir que la escorrentía ingrese a los campos, etc.”

Paragraph 3: We suggest its deletion as it is not consistent with the heading of section 3.1.1.

### In 3.1.2 Wild and domestic animals and human activity

We suggest that the term “ingresos” be replaced with “insumos” and that the following amendments be made for better understanding of the text and better wording in Spanish.

Paragraph 1: “..... Los animales domésticos y silvestres así como la actividad humana presentan riesgos tanto debido a la contaminación directa del cultivo y de la tierra, como de la contaminación de fuentes de agua superficial y otros **insumos** ~~ingresos~~. ...”

Bullet point 3: “.....Cuando exista tal evidencia, los productores deberían evaluar los riesgos y determinar si la parcela **afectada debiera ser cosechada o no** ~~debiera ser cosechada~~ para el consumo directo.

### In 3.2 Hygienic primary production of berries

Paragraph 1: “Berries are pulpy fruits with high **water** ~~moisture~~ content and a soft skin, which makes them susceptible to physical damage that accelerates deterioration of berries by increasing water loss and provide conditions for contamination during production, harvest and transport. Physical damage to the berries may occur during harvesting from the use of sharp edged ~~storage~~ containers, improper field packing or through careless and poor handling.”

Paragraph 3: The following text is suggested:

**“Where different types of mulch (e.g., mould, straw, bark, plastic, etc.) are used in the plant row during growing, to minimize contact with the soil, it is recommended that they should be clean y that they should be used only once to prevent cross contamination”.**

~~Where materials are used under the berries during growing, to minimize contact with the soil, e.g. mulch or biodegradable materials or during harvest, e.g. plastic, to collect harvested fruits, it is recommended that:~~

- ~~Plastic should be clean and sanitary.~~
- ~~If biodegradable materials and/or mulch are used, they should be applied only once and not reused in order to prevent cross contamination.~~

In 3.2.1.2 Manure, biosolids and other natural fertilizers we believe the following change needs to be made in view of the hazardous nature of these inputs:

Paragraph 1: “**Avoid** the use of untreated manure and liquid manure ~~should be avoided to the extent possible~~. ....”

**3.2.3.2 Health Status** We recommend the following wording to involve not only growers but also lead hands or foremen who are in direct contact with workers in order to detect the symptoms. In addition, it is important for them to stay away from work and not to go back until discharge.

Bullet point 1: Growers **or lead hands noting** ~~should be encouraged to note~~ symptoms of diarrhoeal **or other typical symptoms of** ~~or~~ food-transmissible communicable diseases **should keep these workers away until they recover and prove that they are healthy** ~~and reassign agricultural workers as appropriate.~~

### 3.2.3.3 Personal cleanliness.

There is no need for a section for this paragraph, so we suggest that it be moved to section 3.2.3.2 with the following changes for better wording in Spanish:

“Cuando se permita que el personal continúe trabajando con cortadas o heridas cubiertas por vendajes a prueba de agua, entonces deberían **usar** ~~portar~~ guantes que los cubran, con lo que se proporcionaría una segunda barrera entre éstos y ~~la manipulación de las bayas.~~”

### 3.2.4 Equipment associated with growing and harvesting

We suggest the following amendment:

Bullet point 1 Containers used repeatedly during harvest should be cleaned (**and disinfected where appropriate**) after each load.

### 3.3 Handling, storage and transport

We suggest the following amendment:

(Spanish wording)

Los productores deberían **ejecutar** ~~poner en práctica~~ prácticas seguras en el manejo, transporte y almacenamiento de las bayas y enfriarlas inmediatamente luego de su cosecha.

Precooling (~~i.e., rapid removal of field heat~~) berries within the first 2 hours after harvesting is important to maintain freshness and quality and contributes to the control of foodborne pathogens. **The most appropriate precooling method should be used depending on the product. Where liquid or solid water (ice) is used, growers should use potable water for ice and hydrocooler when for precooling, water should be potable to minimize risks of contamination.**

In 4.2.1 Design and Layout we suggest explicit clarification of the separation of the dirty area (field fruit) from the clean area (already washed or processed fruit), so we suggest the following wording:

Paragraph 1: For berries that are washed (e.g., berries which will be frozen), premises and rooms should be designed to separate **the area for incoming berries from the field (dirty area) from the area for handling clean berries (clean area)** ~~areas for incoming soiled and outgoing washed berries.~~ This can be accomplished in a number of ways, including linear product flow.

In 5.2.2.1. Post-harvest water use we suggest explicit clarification of the need for microbiological testing for pathogens and other changes for better wording in Spanish.

(Spanish wording)

~~Después de su cosecha y~~ En general, la mayoría de las bayas destinadas al consumo directo no se lavan después de cosechadas, ~~Más~~ sin embargo, si se hiciera debería usarse agua limpia o de preferencia potable.

It is recommended that water used in pre-washing **of berries** and **washing of equipment and packing establishments** ~~tanks in packing establishments~~ be controlled and monitored, i.e. recording the pH and temperature, turbidity, water hardness, **testing for indicator microorganisms or pathogens** ~~and product throughput capacity.~~

In 5.3 Incoming material requirements we recommend the following:

- (...) that have visible signs of decay, ~~or~~ damage **or wounds** due to the increased risk of microbial contamination.
- Berries should be cooled **as soon as possible to reduce field heat, and processed** and stored ~~as soon as possible~~ under temperature controls ~~within the processes.~~

### BRAZIL

1. Brazil supports to forward the standard to Step 5/8, and would like to expand the list of Strawberry scientific names suggesting the replacement of the Species names *Fragaria grandiflora* L. and *Fragaria vesca* L., as listed in the current version of the document, by the genus *Fragaria* L. to the approved list of the Code in Section 2.1.

2. That amendment provides flexibility to the proposed Code of Practice and includes other produced strawberry cultivar in the world i.e. *Fragaria x ananassa* Duch, improving its application and use.

## SECTION 2 - SCOPE, USE AND DEFINITION

### 2.1 Scope

This Annex covers specific guidance related to all areas, from primary production to consumption, of berries that are intended to be consumed raw (e.g., fresh berries) and/or are processed without a microbiocidal step.

This Annex encompasses all edible varieties of strawberries (i.e. ~~*Fragaria grandiflora* L. and *Fragaria vesca* L.~~ ***Fragaria* L.**), raspberries (i.e. *Rubus idaeus* L.), blackberries (i.e. *Rubus* spp.), mulberries (i.e. *Morus* L.), blueberries (i.e. *Vaccinium* spp.), currants and gooseberries (i.e. *Ribes* L.) and groundcherries (i.e. *Physalis peruviana* L.).

### COSTA RICA

Costa Rica apoya remitir la norma al Trámite 5/8, Asimismo; propone ampliar la lista de los nombres científicos de fresa que sugieren la sustitución de la especie ***Fragaria grandiflora* L. y *Fragaria Vesca* L.**, enumeradas en la versión actual del documento, por el género *Fragaria* L. a la lista del Código en la sección 2.1 aprobada.

**Justificación:** Esta modificación proporciona flexibilidad al Código de Prácticas e incluye otro cultivo de fresa producida en el mundo, es decir *Fragaria x ananassa* Duch, mejorando su aplicación y uso.

## SECCIÓN 2 - ÁMBITO DE APLICACIÓN, UTILIZACIÓN Y DEFINICIONES

### 2.1 Alcance

Este anexo comprende orientación específica relacionada con todas las áreas, desde la producción primaria hasta el consumo, de las bayas que estén destinados a ser consumidas crudas (por ejemplo, frutas frescas) y/o están procesados sin un paso microbicida.

**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 Argentina, Australia, Brazil, Canada, Japan, Malaysia, Uruguay, United States of America*

Brazil, Canada, Japan, Malaysia support the adoption of the Draft Revised Guidelines at step 8.

### ARGENTINA

Argentina agradece la posibilidad de realizar los siguientes comentarios

En el documento en idioma español:

En el punto 4.1.2.1

Donde dice “Las legumbres frescas y secas tienen que ser elaboradas...”. Debe decir “tiene que ser tratadas” por ser la manera correcta de referirse.

En el punto 4.1.2.3

Donde dice gossipol debe decir gosipol por ser la correcta traducción del documento en inglés.

En el punto 5.3. 1 y 5.4.1

Donde dice dextrinización, debe decir dextrinización por ser la forma correcta de escritura

Con respecto a las semillas de sésamo y algodón en ambos casos sería más aconsejable usar harinas desgrasadas ya que los aceites pueden tener efectos negativos.

Fundamento: Otros componentes de los aceites vegetales pueden tener efectos adversos en lactantes y niños pequeños. Se ha informado que los ingredientes insaponificables del aceite de semillas de sésamo causan reacciones alérgicas y que los ciclopropenoides en el aceite de semilla de algodón afectan la desaturación de los ácidos grasos esenciales. Por lo tanto, el uso de ambos aceites en la producción de alimentos infantiles ha sido prohibido en Europa.

Necesidades lipídicas de los lactantes: implicaciones para la composición nutricional de los alimentos complementarios. Ricardo Uauy and Carlos Castillo. J. Nutr.133: 2962S-2972S, 2003.

En el punto 6.4.2

Donde dice acido alfa linoleico debe decir alfa-linolénico

En el punto 6.6.3.3

Donde dice “alimento empaquetado” debe decir “alimento envasado”, por ser la correcta traducción del documento en ingles

#### AUSTRALIA

Australia has no position on the Draft Revision of the Guidelines on Formulated Supplementary Foods for Older Infants and Young Children (CAC/GL 8-1991) (para. 41, Appendix II) but points out that there are minor editorial errors in the Annex to the Guidelines.

- a. The footnote identifier [#16 (incorrect footnote number)] attached to column 2 heading REFERENCE NUTRIENT INTAKE of the Table has lost its footnote. The most recent footnote wording in CCNFSU REP12 /Appendix IV (2011), which is consistent with paragraph 34 CCNFSU REP13, is: **“RNI or INL<sub>98</sub> from FAO/WHO Vitamins and Mineral Requirements in Human Nutrition. 2nd Edition. FAO/WHO 2004 (for all nutrients except copper, manganese and phosphorus).”**
- b. There is a duplicate footnote number #10

#### URUGUAY

ASUNTO: REP 13/CNFSU Apéndice II 48

Uruguay agradece la oportunidad de enviar comentarios sobre el texto propuesto como Anexo II en el Reporte 13 del CNFSU: **DIRECTRICES SOBRE PREPARADOS ALIMENTICIOS COMPLEMENTARIOS PARA LACTANTES DE MÁS EDAD Y NIÑOS PEQUEÑOS**

(Trámite 8) incluido en la CL 2012/42 – NFSU

	<b>COMENTARIOS DE URUGUAY</b>
<p><b>4.1.4 Alimentos de origen animal</b></p> <p>Los alimentos de origen animal, como la carne roja, el pescado, la carne de ave, los huevos, la leche y los productos lácteos, son alimentos con un alto contenido en nutrientes y buenas fuentes de proteínas y micronutrientes de alta calidad, y se anima a que se incorporen estos alimentos o sus concentrados proteínicos derivados a preparados alimenticios complementarios cuando lo permita la tecnología.</p>	<p>En concordancia con las Pautas del Alimentación del Niño dictadas por la Sociedad Uruguaya de Pediatría, Uruguay propone que se incluya la siguiente aclaración en el texto.:</p> <p>“En los niños atópicos el pescado se incorporará a partir de los 9 meses de edad”</p> <p>o la siguiente frase:</p> <p>“Los gobiernos podrán utilizar las pautas específicamente establecidas para ese país”.</p>
<p><b>6.3 Proteínas</b></p> <p>6.3.1 Las mezclas de cereales, leguminosas frescas o secas y/o harinas de semillas oleaginosas pueden constituir una fuente apropiada de proteínas con tal que las</p>	<p>En concordancia con las Pautas del Alimentación del Niño dictadas por la Sociedad Uruguaya de Pediatría, Uruguay propone que se incluya la siguiente aclaración en el texto.:</p> <p>“En los niños atópicos el pescado se incorporará a</p>

<p>proteínas contenidas en el preparado alimenticio complementario satisfagan los criterios que se indican más abajo. La calidad de las proteínas también se puede mejorar mediante la inclusión de productos de pescado, leche y productos lácteos u otros alimentos de origen animal.</p>	<p>partir de los 9 meses de edad” o la siguiente frase: “Los gobiernos podrán utilizar las pautas específicamente establecidas para ese país”</p>
<p><b>CUADRO</b></p> <p>Los valores de referencia INL98 incluidos en el cuadro proporcionan una orientación para la selección de las vitaminas y los minerales, y sus cantidades, al objeto de añadirse a los preparados alimenticios complementarios. La cantidad total sugerida de cada una de estas vitaminas y cada uno de estos minerales contenidos en una ración diaria del preparado alimenticio complementario es equivalente por lo menos al 50% de INL98.</p> <p>Vitamin D 5 microg Calcium 500 mg</p>	<p>La Sociedad Uruguaya de Pediatría, toma como referencia las pautas de la Academia Americana de Pediatría basadas en las recomendaciones de IOM en el 2010 y publicadas en el 2011 para Vitamina D y Calcio</p> <p>Las recomendaciones son las siguientes: Vit D 15 microg Calcio 700 mg</p> <p>Uruguay solicita que estos valores sean tenidos en cuenta em revisión de los mismos o bien se agregue una frase adicional que diga: “Los gobiernos podrán utilizar Valores de Referencia de Nutrientes diferentes, teniendo en cuenta factores específicos de su país o región”.</p>

#### UNITED STATES OF AMERICA

The United States of America supports adoption at Step 8 of the draft revision of the *Guidelines on Formulated Supplementary Foods for Older Infants and Young Children*.

#### Minor editorial comments:

1. In the Table in the Annex of Appendix II, the text that accompanies footnote 16 is missing. The most recent text for this footnote can be found in REP12/NFSDU, Appendix IV, p. 54 in Footnote 14, and simply identifies the source of the values in this column. This footnote reads:

“RNI or INL<sub>98</sub> from FAO/WHO Vitamins and Mineral Requirements in Human Nutrition. 2<sup>nd</sup> Edition. FAO/WHO 2004 (for all nutrients except copper, manganese and phosphorus).”

2. In another editorial comment, the U.S. notes that in the above FAO/WHO publication, the abbreviation “RNI” stands for “*recommended* nutrient intake” (See Section 1.2.2 , p.2), whereas this abbreviation is used in the Appendix II Annex to refer to “*reference* nutrient intake” which we interpret as a generic term without a definition in this FAO/WHO publication. Consequently to avoid possible confusion, the U.S. considers it may be preferable to use the generic term “reference nutrient intake” in both the table heading and associated footnote without an abbreviation.

With the above minor editorial changes, footnote 16 would be renumbered as footnote 14, and the footnote would read:

“**Reference nutrient intake** ~~RNI~~ or INL<sub>98</sub> from FAO/WHO Vitamins and Mineral Requirements in Human Nutrition. 2<sup>nd</sup> Edition. FAO/WHO 2004 (for all nutrients except copper, manganese and phosphorus).”

Draft Nutrient Reference Values (NRVs), at Step 8 (REP13/NFSDU para. 65, Appendix V)
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*Comments of Argentina, Australia, Brazil, Canada, Japan, United States of America*

Argentina, Australia, Brazil, support adoption of the draft Nutrient Reference Values at Step 8.

**CANADA**

Canada supports adoption of the proposed draft NRVs-NCD for sodium and saturated fat of 2000 mg and 20 grams, respectively. These values were derived based on the principles set out in the Draft *General Principles for Establishing Nutrient Reference Values for Nutrients Associated with Risk of Diet-Related Noncommunicable Disease for the General Population (NRVs-NCD)* forwarded by the CCNFSDU 34<sup>th</sup> session for adoption by the Commission at Step 5/8 (see item 3, below).

Saturated fat and sodium are now among the nutrients that must be declared in nutrition labelling. Adopting the NRVs-NCD for these nutrients permits the CCNFSDU to complete work undertaken in support of the WHO Global Strategy on Diet, Physical Activity and Health. Also, it will support official authorities in requiring the expression of the amounts of these nutrients on food labels in a manner that makes it easier for consumers to understand the significance of these amounts so that they can make healthier food selections and reduce their risk of diet-related non-communicable disease.

**JAPAN**

Japan supports Draft NRVs for saturated fatty acid and sodium.

However, Japan considers that in accordance with the agreement at the 30th CCNFSDU, Proposed Draft General Principles for establishing NRVs-NCD should be discussed and adopted in advance of the adoption of the Draft NRVs.

**UNITED STATES OF AMERICA**

The U.S. supports adoption at Step 8 of the following proposed draft Nutrient Reference Values for nutrients associated with risk of diet-related noncommunicable disease (NRVs-NCD) for the general population:

Saturated fatty acids	20 g
Sodium	2000 mg

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 Argentina, Australia, Brazil, Canada, Japan, United States of America*

Argentina, Australia, Japan, United State of America support adoption of the draft General Principles at Step 5/8.

**BRAZIL**

At the 34<sup>th</sup> Session of the CCNFSDU, Brazil expressed its reservation with regard to the use of the GRADE (Grading of Recommendations, Assessment, Development and Evaluation) approach in Section 3.1 to assess the quality of a body of evidence, because there was no time for consideration and consultation with national stakeholders. Thus, Brazil pointed out that the text in the first bullet point in Section 3.1 should be retained in square brackets for further consideration (paragraphs 48 and 49 of the Rep 13 NFSDU).

After evaluating the document “WHO Handbook for guideline development. Geneva, World Health Organization (WHO), 2012”, Brazil agrees with the GRADE approach. We understand that the comparable level to the convincing scientific evidence under the GRADE classification is the high quality evidence.

Therefore, Brazil agrees with the document.

**CANADA**

The consolidated Annex would be called, *General Principles for Establishing Nutrient Reference Values*. Canada continues to believe that when a nutrient is selected by Codex for the establishment of an NRV-NCD, the evidence for the nutrient-NCD relationship should be “convincing” or equivalent. The Proposed Draft adequately maintains this requirement for NRVs-NCD established by Codex and recommends this level be applied by Official Authorities establishing NRVs-NCD for their own jurisdictions.

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 Argentina, Australia, Brazil, Canada, Japan, Malaysia, United States of America*

Argentina, Australia, Brazil, Japan, Malaysia support adoption of the draft Additional or Revised Nutrient Reference Values at Step 5/8.

**CANADA**

The CCNFSDU 34<sup>th</sup> session proposed the adoption of additional or revised NRVs-R for several vitamins and minerals. Canada agrees that there is a high probability that the draft NRVs for Vitamin K, Thiamin, Riboflavin, Niacin, Vitamin B6, Folate, Vitamin B12, Pantothenate, Biotin, Calcium and Iodine are suitable given that these were found suitable using the FAO/WHO spreadsheet reference values and the Institute of Medicine reference values (the latter demonstrated by the US) as the comparators. Canada therefore supports the adoption of these values along with the conversion factors for Folate and Niacin and related footnotes.

**UNITED STATES OF AMERICA**

**General Comment:**

The U.S. calls the attention of other delegations to the final clause of the text of a note inserted beneath the table for “Conversion factors for niacin and folate equivalents” at the end of Appendix VII for the **Proposed Draft Additional or Revised Nutrient Reference Values for Labelling Purposes in the Codex Guidelines on Nutrition Labelling**. Here is the text of the note:

The conversion factors for vitamin equivalents in the Table provide supporting information for national authorities to enable national authorities to determine the application of NRVs at national level ~~and they are not intended as a harmonisation of the conversion factors per se.~~

The U.S. reiterates the position (expressed in REP13/CCNFSDU, para 97) that this final clause should not be included, and the U.S. strongly recommends ending the note after the words “national level” because the final clause (struck out, above) appears to be inconsistent with the harmonization goals of Codex, and it is potentially misleading. The final clause is unnecessary in view of the preceding text and the voluntary nature of documents adopted by the Commission.

Furthermore, the Preamble to the *General Principles for Establishing Nutrient Reference Values of Vitamins and Minerals for the General Population* (CAC/GL 2-1985) and the Preamble for the consolidated version of the *Proposed Draft General Principles for Establishing Nutrient Reference Values* (Item 3 of CL 2012/42) state clearly that governments may consider “additional factors specific to a country or region in establishing their own reference values for labelling purposes...”

More importantly, this superfluous text is potentially misleading by suggesting that there is something unreliable about the conversion factors that the Committee is proposing for adoption. Of course, should new scientific information come to light in the future, the Committee can consider revisions at that time, but there is no reason to cast doubt on the validity of the current proposal, which reflects the science available today and should not be delayed because of speculation about possible future developments.

With this minor adjustment, the U.S. supports the adoption of these vitamin and mineral NRVs at Step 5/8 (see Item 4, below, in “Specific Comments”). The U.S. is ready to work with other delegations to agree in advance on acceptable text so that the proposed draft revisions can be adopted without debate at the 36<sup>th</sup> Session of the Codex Alimentarius Commission.

**Specific Comment**

As noted in our General Comment (above), the U.S. supports adoption at Step 5/8 of the proposed draft additional or revised *Nutrient Reference Values for Labelling Purposes* in the *Guidelines on Nutrition Labelling* at Step 5/8 with the deletion of the text (struck, below) in the note at the bottom of the table on conversion factors for vitamin equivalents in Appendix VII:

The conversion factors for vitamin equivalents in the Table provide supporting information for national authorities to enable national authorities to determine the application of NRVs at the national level ~~and they are not intended as a harmonization of the conversion factors per se.~~

The U.S. considers this text inconsistent with Codex harmonization goals, potentially misleading because it implies that the proposal is of lesser value than other Codex texts, and unnecessary because the use of Codex provisions by governments is voluntary. This latter point is further emphasized in the Preamble to the *General Principles for Establishing Nutrient Reference Values of Vitamins and Minerals* (GL -1985, Annex).

**FAO/WHO Coordinating Committee for the Near East**  
**Comité FAO/OMS de coordination pour le Proche-Orient**  
**Comité Coordinador FAO/OMS para el Cercano Oriente**

Regional Standard for Date Paste, at Step 5/8 (REP13/NEA para. 89, Appendix III)

*Comments of Egypt, United States, IIF*

**EGYPT**

Item: 3.1.1 dates used for making date past shall be **according to Codex STAN 143/1985** and free from diseases and contain no parthenocarpic or unripe fruits

Item 3.2.4( to be deleted as item 4 is sufficient)

Item 3.2.6 It may be made from a single variety of dates or a blend of several varieties, provided to specify those varieties;**(on data label)**

Item 3.2.8( to be deleted as this item is stated in codex stan. 143/1985)

New item 5.3 the product included in this standard should abide to the Maximum levels for radiation contaminants issued bu codex .

The other comments on the rest items are relevant to Arabic version

السادة / أمانة هيئة الدستور الغذائي

....برنامج المواصفات الغذائية المشترك بين منظمة الأغذية والزراعة...

(FAO)

ومنظمة الصحة العالمية (WHO)

تحية طيبة وبعد ...

ايماء إلى كتاب سيادتكم (CL 2013/1-NEA) بشأن المسائل المطروحة على هيئة الدستور الغذائي للموافقة عليها في دورتها (36) التي ستعقد في روما – ايطاليا في الفترة من 1- 5 يوليو 2013 وبيانها على النحو التالي :

- مشروع مدونة الممارسات الإقليمية للأغذية التي تباع في الشوارع لدى الخطوة (8) من الإجراءات .

- مشروع المواصفة الإقليمية المقترحة لمعجون التمور لدى الخطوات (8/5) من إجراءات الكودكس.

أتشرف بالإحاطة بأن جمهورية مصر العربية توافق على مشروع مدونة الممارسات الإقليمية للأغذية التي تباع في الشوارع واعتمادها عند الخطوة (8) من إجراءات الكودكس .

- أما بخصوص مشروع المواصفة الإقليمية المقترحة لمعجون التمور فمرفق طيه ملاحظات مصر على المشروع المشار إليه .

لذا يرجى التفضل بالعلم والإحاطة والتنبيه باتخاذ ما يلزم ،

وتفضلوا بقبول فائق الاحترام ،،،

رئيس مجلس إدارة

الهيئة المصرية العامة للمواصفات والجودة

رئيس اللجنة المصرية لدستور الأغذية

د.مهندس. حسن احمد عبد المجيد



**UNITED STATES OF AMERICA****General comment:**

To facilitate consistency with other Codex Processed Fruit and Vegetables Standards and to facilitate greater international use and acceptance of this proposed standard, the United States recommends harmonizing the proposed Date Paste Standard with the existing Codex Standard Layout for Processed Fruit and Vegetables

**Specific Comments:****3. Quality Factors:**

The United States recommends placing all of the quality characteristics of the main ingredient (Dried dates) in Section 3.1 and those of the final product (Date Paste) in Section 3.2. In this regard Section 3.2.3 should be moved to become 3.1.3. Therefore, Section .1 would read as follows:

- 3.1. Dates used for making date paste shall be
  - 3.1.1 Free from diseases and contain no parthenocarpic or unripe fruits;
  - 3.1.2 Free from insects or insect fragments, eggs, larvae or frass.
  - 3.1.3 Free of dirt and foreign matter;

**INSTITUT INTERNATIONAL DU FROID (IIF)**

L'IIF salue l'important travail mené par le comité pour la région Moyen-Orient.

L'IIF souhaite soumettre les propositions de modifications et les commentaires suivants :

**7.4 Aliments non consommés**

Tous les aliments cuits et boissons préparées non vendus qui ne peuvent pas être conservés dans des conditions satisfaisantes doivent être éliminés à la fin de la journée.

*Commentaire : selon les conditions météorologiques, certains aliments qui ne peuvent être conservés dans de bonnes conditions peuvent devenir impropres à la consommation avant la fin de la journée*

**7.5.3** Les denrées périssables doivent être transportées sous contrôle de la température. Une attention particulière doit être apportée aux opérations de chargement et de déchargement, qui sont souvent les phases les plus critiques.

**7.6.6** Les réfrigérateurs et les congélateurs ne doivent pas être trop remplis et leurs températures doivent être respectivement maintenues entre 0 et 4° C et à - 18° C ou en-dessous.

*Commentaires :*

*1) s'agissant de températures à ne pas dépasser, l'expression « au moins » peut être ambiguë*

*2) sur le fond, les produits de la mer devraient être conservés à la température de la glace fondante et la viande hachée à 2 °C au maximum ; fixer une température maximale de 4°C pour tous les aliments réfrigérés a l'avantage de la simplicité, mais il faudrait alors fixer des durées maximales de conservation adaptées.*

**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)
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*Comments of Argentina, Brazil, Costa Rica, Egypt, India, Kenya*

Brazil, Costa Rica, India and Kenya support adoption of the draft Guidelines at Step 8.

**ARGENTINA****Comentarios generales:**

Argentina desea felicitar a la presidencia del Grupo de Acción por el gran trabajo que han realizado en un tema tan complejo y con múltiples aristas, pero deseamos realizar las siguientes observaciones:

**Comentarios específicos:**

**Párrafo 5:** Argentina no está de acuerdo en incluir dentro del apartado 5 de este documento, aquellos textos de Codex sobre Análisis de Riesgos que están destinados al proceso de análisis de riesgos en el Codex y no a los gobiernos. Por tal razón se sugiere mantener solamente los que en su ámbito están destinados a los gobiernos.

- *Principios Prácticos sobre el Análisis de Riesgos para la Inocuidad de los Alimentos Aplicables por los Gobiernos* (CAC/GL 62-2007)
- *Directrices para el Análisis de Riesgos de Resistencia a los Antimicrobianos transmitida por los Alimentos* (CAC/GL 77-2011);
- *Principios y Directrices para la Aplicación de la Evaluación de Riesgos Microbiológicos* (CAC/GL 30- 1999).

Atento a ello se deberían eliminar los siguientes documentos:

- Principios de Aplicación Práctica para el Análisis de Riesgos Aplicables en el Marco del Codex Alimentarius;
- Principios de Análisis de Riesgos Aplicados por el Comité del Codex sobre Aditivos Alimentarios y el Comité del Codex sobre Contaminantes en los Alimentos<sup>2</sup>;
- Principios para el Análisis de Riesgos Aplicados por el Comité del Codex sobre residuos de Plaguicidas<sup>2</sup>;
- Principios para el Análisis de Riesgos Aplicados por el Comité del Codex sobre Residuos de Medicamentos Veterinarios en los Alimentos;
- Adicionalmente debería eliminarse el último párrafo que dice lo siguiente: “Más información disponible en el documento Principios y Métodos de la OMS para la Evaluación de Riesgos de Sustancias Químicas en la Alimentación<sup>3</sup> y en la Serie FAO/OMS sobre Evaluación de Riesgos” Microbiológicos (ERM)<sup>4</sup>.

**Superadas estas cuestiones Argentina podría apoyar su aprobación en trámite 8**

**EGYPT****1. under definition :**

Egypt suggests to change the word “ **transparent**” to” **transparency**”

**2. Page 5 under hazard characterization****Number 32**

- **To refer to the reference in item 32 as usual and to be included in the margins below**
- <sup>7</sup> General Guidelines on sampling ( CAC/GL 50-2004)
- <sup>8</sup> General Criteria for the selection of methods of analysis using the Criteria Approach .

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

*Comments of Argentina, Brazil, Costa Rica, Egypt, India, Kenya*

India and Kenya support the adoption of the proposed draft Guidance at Step 5/8.

## ARGENTINA

### Comentarios Generales

Argentina desea ratificar la reserva que quedó plasmada en el párrafo 55 del Informe 13/7 AF, en cuanto a que debe eliminarse el Anexo de este documento con la lista de peligros. Dicha reserva fue acompañada por Brasil y Costa Rica. La preocupación sobre la inclusión del anexo son dos, la primera es que la lista no puede actualizarse con facilidad, de hecho originalmente fue considerada la lista de peligros de la consulta de Expertos de la FAO/OMS sobre el “Impacto de los Piensos en la Inocuidad de los Alimentos”, publicado en 2008, y abordaba los peligros en los piensos relevantes para la inocuidad de los alimentos, y por otra parte las autoridades competentes podrían malinterpretar el objetivo del anexo y utilizar la información allí incluida para establecer directamente requisitos sanitarios sin examinar su necesidad, lo cual sería contrario a los principios del comercio y resultar en restricciones indebidas. Por otra parte, el Anexo actual incluye otros peligros que no fueron considerados por los expertos.

Atento a ello, entendemos que dicho Anexo debería ser eliminado y solamente regularse medidas para el control de peligros que hayan sido sometidos a la evaluación de riesgos, cuando corresponda.

**Argentina apoya la aprobación de este documento en trámite 5 a la espera de que se resuelva el planteo sobre el anexo en cuestión.**

## BRAZIL

### General comments

Brazil regrets that the last version of the proposed draft on prioritizing hazards in feeds was distributed three days before the seventh session of the ad-hoc intergovernmental Codex Task Force on Animal Feeding, with the contents completely changed.

This proceeding greatly impaired the discussions and formulation of the Brazilian proposal. Brazil would like to point out that according to Codex Procedural Manual “Papers for a session should be sent by the chairperson of the Codex Committee concerned at least two months before the opening of the session”.

Brazil reaffirms that not following the Procedural Manual of Codex Alimentarius Commission prejudice the members, sets a precedent that discourages the participation of Codex members, particularly of developing countries, in Codex activities; represents a risk for the role of Codex as an international standard-setting body and outrages, weakens, and debilitates the multilateralism system of the countries; disable internal consultations to experts and cause instability in the country positions due to time constraints. (*See footnote 1: Note of the Codex Secretariat*).

References to the Codex Alimentarius documents are given below:

*The Procedural Manual of the Codex Alimentarius Commission states “Papers for a session should be sent by the chairperson of the Codex Committee concerned at least two months before the opening of the session to the following:*

*(i) all Codex Contact Points,*

*(ii) chief delegates of member countries, of observer countries and of international organizations, and*

*(iii) other participants on the basis of replies received. Twenty copies of all papers in each of the languages used in the Committee concerned should be sent to the Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, FAO, Rome”.*

The delegations of Argentina, Brazil and Costa Rica expressed their reservation to the inclusion of the Annex II – EXAMPLES OF HAZARDS IN FEED WITH POTENTIAL RELEVANCE FOR HUMAN HEALTH in the Guidance noting that: the Annex could not be easily updated; the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety, published in 2008, addressed feed hazards of relevance to food safety; and that competent authorities could misinterpret the purpose of the Annex and use the information therein as unnecessary sanitary requirements that could compromise trade.

In this sense, any example linked with the Codex document, publication in international organizations or such continuation could lead to misinterpretation by competent authorities and even result in the false perception and/or misunderstanding of the risk and thus compromise trade. Inclusion of such examples in a

Codex document could be understood by some countries that these examples have status in the context of the SPS Agreement.

### **Specific Comments**

#### **DEFINITIONS**

Feed additive: Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has nutritional value, that affects the characteristics of feed or animal products. Micro-organisms, enzymes, acidity regulators, trace elements, vitamins and other products fall within the scope of this definition depending on the purpose of use and method of administration.<sup>2</sup>

~~2 Codex Alimentarius Commission: Procedural Manual~~

2 Code of Practice on Good Animal Feeding (CAC/RCP 54-2004)

**Rationale:** Brazil suggests the correction of the reference to the Code of Practice of Good Animal Feeding (CAC/RCP 54-2004) and already mentioned in the Appendix III of the REP13/AF Report.

#### **~~ANNEX 2~~**

#### **~~EXAMPLES OF HAZARDS IN FEED WITH POTENTIAL RELEVANCE FOR HUMAN HEALTH~~**

Brazil requests the removal of Annex II, according to the reservation documented in the report of the meeting.

**Rationale:** These examples may not be relevant everywhere or at all times; they simply illustrate the range of hazards, feeds and edible products which may need to be considered in a given location at a given time. Rare and emerging hazards are not covered. It is difficult to update this data, which is already listed in Doc FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety published in 2008. The purpose of the Annex could be misunderstood by the competent authorities and their information used as unnecessary sanitary requirements that can compromise trade. Therefore, we ask that the examples are not considered at the same status of a Codex document and are instead made available in the FAO website thus dispensing the need to continue their revision or update by Codex.

In addition to these arguments, Brazil would like to highlight some examples of inconsistencies in the Annex II that substantiate the need for such removal.

Examples of toxins are given in Paragraph 18. It mentions they are rapidly metabolized and/or excreted by food producing animals and are therefore not major contaminants of edible products hence not part of the scope of this work.

Moreover, paragraph 25 of this Annex, may lead to misinterpretation as the type of cross-contamination mentioned may only be considered a hazard when the Good Manufacturing Practices are not adopted.

#### **COSTA RICA**

##### **General comments**

Brazil and Costa Rica, regrets that the last version of the proposed draft on prioritizing hazards in feeds was distributed three days before the seventh session of the ad-hoc intergovernmental Codex Task Force on Animal Feeding, with the contents completely changed.

This proceeding greatly impaired the discussions and formulation of the Brazilian and Costa Rica proposal. We would like to point out that according to Codex Procedural Manual “Papers for a session should be sent by the chairperson of the Codex Committee concerned at least two months before the opening of the session”.

Brazil and Costa Rica reaffirms that not following the Procedural Manual of Codex Alimentarius Commission prejudice the members, sets a precedent that discourages the participation of Codex members, particularly of developing countries, in Codex activities; represents a risk for the role of Codex as an international standard-setting body and outrages, weakens, and debilitates the multilateralism system of the countries; disable internal consultations to experts and cause instability in the country positions due to time constraints. (*See footnote 1: Note of the Codex Secretariat*).

References to the Codex Alimentarius documents are given below:

*The Procedural Manual of the Codex Alimentarius Commission states “Papers for a session should be sent by the chairperson of the Codex Committee concerned at least two months before the opening of the session to the following:*

*(i) all Codex Contact Points,*

*(ii) chief delegates of member countries, of observer countries and of international organizations, and*

*(iii) other participants on the basis of replies received. Twenty copies of all papers in each of the languages used in the Committee concerned should be sent to the Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, FAO, Rome”.*

The delegations of Argentina, Brazil and Costa Rica expressed their reservation to the inclusion of the Annex II – EXAMPLES OF HAZARDS IN FEED WITH POTENTIAL RELEVANCE FOR HUMAN HEALTH in the Guidance noting that: the Annex could not be easily updated; the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety, published in 2008, addressed feed hazards of relevance to food safety; and that competent authorities could misinterpret the purpose of the Annex and use the information therein as unnecessary sanitary requirements that could compromise trade.

In this sense, any example linked with the Codex document, publication in international organizations or such continuation could lead to misinterpretation by competent authorities and even result in the false perception and/or misunderstanding of the risk and thus compromise trade. Inclusion of such examples in a Codex document could be understood by some countries that these examples have status in the context of the SPS Agreement.

## Specific Comments

### DEFINITIONS

Feed additive: Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has nutritional value, that affects the characteristics of feed or animal products. Micro-organisms, enzymes, acidity regulators, trace elements, vitamins and other products fall within the scope of this definition depending on the purpose of use and method of administration.<sup>2</sup>

~~2 Codex Alimentarius Commission: Procedural Manual~~

2 Code of Practice on Good Animal Feeding (CAC/RCP 54-2004)

**Rationale:** Brazil and Costa Rica, suggests the correction of the reference to the Code of Practice of Good Animal Feeding (CAC/RCP 54-2004) and already mentioned in the Appendix III of the REP13/AF Report.

### ~~ANNEX 2~~

### ~~EXAMPLES OF HAZARDS IN FEED WITH POTENTIAL RELEVANCE FOR HUMAN HEALTH~~

Brazil and Costa Rica, requests the removal of Annex II, according to the reservation documented in the report of the meeting.

**Rationale:** These examples may not be relevant everywhere or at all times; they simply illustrate the range of hazards, feeds and edible products which may need to be considered in a given location at a given time. Rare and emerging hazards are not covered. It is difficult to update this data, which is already listed in Doc FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety published in 2008. The purpose of the Annex could be misunderstood by the competent authorities and their information used as unnecessary sanitary requirements that can compromise trade. Therefore, we ask that the examples are not considered at the same status of a Codex document and are instead made available in the FAO website thus dispensing the need to continue their revision or update by Codex.

In addition to these arguments, Brazil and Costa Rica would like to highlight some examples of inconsistencies in the Annex II that substantiate the need for such removal.

Examples of toxins are given in Paragraph 18. It mentions they are rapidly metabolized and/or excreted by food producing animals and are therefore not major contaminants of edible products hence not part of the scope of this work.

Moreover, paragraph 25 of this Annex, may lead to misinterpretation as the type of cross-contamination mentioned may only be considered a hazard when the Good Manufacturing Practices are not adopted.

### EGYPT

1) – **under introduction (page 1):**

Number 2 second line replace edible products to be “ **edible products of animal origin** “

2) **Under scope**

**Point 3 line 2**

Egypt suggests to exclude the whole statement between brackets to avoid duplication in definitions .

3- **Under definitions**

**Point carry over:** delete” feed or feed ingredient” stated in the definition as it was stated previously in the definitions to avoid unnecessary repetition .

4- **Under Definition:**

**Page 2 processing aid :**

Delete from to (not including .....to by itself.)

5- **step2 .Identification and definition of the criteria .**

Number 19 Egypt prefers to keep the original statement and add as well (**concentration of hazard**)

**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 Argentina, Brazil, Costa Rica, Colombia, Egypt, India, Kenya, Malaysia, Paraguay, United States of America*

Brazil, Costa Rica, Egypt, India, Kenya, Paraguay support the adoption of the Draft and Proposed Draft Principles and Guidelines at Steps 8 and 5/8.

### ARGENTINA

• **Comentarios Generales:**

Argentina agradece la posibilidad de realizar comentarios sobre este tema y aprovecha la oportunidad para felicitar a la presidencia y el secretariado de FICS por el importante trabajo realizado. Como hemos señalado en otras oportunidades creemos que este documento es un pilar importantísimo de la labor del Codex en cuanto a la protección de la salud pública en relación con la inocuidad de los alimentos, la prevención del fraude y la información al consumidor y nos complacería acompañar su aprobación al cumplirse el 50° Aniversario del Codex Alimentarius.

Dicho ello, Argentina desearía que sean tenidas en cuenta para su aprobación las siguientes observaciones.

• **Comentarios Específicos:**

- a. **Principio 4, Párrafo 12.** Argentina considera que se debe incluir el término “**transportista**” en la nota al pie numero 3, donde se detalla a quienes se considera “**operadores de la industria alimentaria**”, ya que el transporte es un eslabón fundamental de la cadena agroalimentaria para garantizar la inocuidad y calidad de los productos y precisa ser mencionado específicamente.
- b. **Párrafo 26 viñeta 3:** Argentina sugiere que en este párrafo en lugar de decir “**basados en la ciencia y el riesgo**”, diga “**basados en riesgos evaluados**” y se elimine la parte en donde dice “**para fomentar**”

**y promover resultados positivos en materia de inocuidad de los alimentos**”, creemos que no la mención a resultados positivos en este contexto puede dar lugar a confusión. Y que la intención de fomentar sistemas cada vez más eficientes se encuentra en otros párrafos.

- c. **Párrafo 31.** En la parte que enumera los factores a tener en cuenta en la toma de decisiones referentes a las políticas públicas, donde dice “**riesgos y/o beneficios**” debería decir: “**riesgos, costos y beneficios**”.

Examinar solamente los beneficios no es parte de un sistema realista, pues los costos en relación con los beneficios que se podrían obtener son un elemento fundamental a considerar al momento de definir una política.

- d. **Párrafo 33.** Argentina considera que en concordancia con otros documentos de Codex se deberían agregar “**los principios de Análisis de Riesgos**” al párrafo mencionado, para que quede de la siguiente manera: “...**los patrones de producción y consumo de alimentos, el perfil de riesgo, “los principios de Análisis de Riesgos...”**”

- e. **Párrafo 57. viñeta.1** Se propone el siguiente agregado a los efectos de contextualizar mejor el ámbito de competencia del sistema de control de alimentos, donde dice “que sean proporcionales al grado de riesgo para la salud pública, al fraude potencial o engaño del consumidor”, debería decir:

“que sean proporcionales al grado de riesgo para la salud pública **en relación con la inocuidad de los alimentos**, al fraude potencial o engaño del consumidor”

Se considera que el termino salud pública es una expresión demasiado amplia, alejándose de la competencia de las normativas alimentarias que regula el Codex Alimentarius. Con la redacción propuesta, se limita el alcance de la expresión a los objetivos de los sistemas nacionales de control de alimentos y se torna consistente con los objetivos duales del Codex.

## COLOMBIA

### SECCIÓN 3 PRINCIPIOS DE UN SISTEMA NACIONAL DE CONTROL DE LOS ALIMENTOS PRINCIPIO 4 FUNCIONES Y RESPONSABILIDADES

12. *Los operadores de la industria alimentaria tienen la responsabilidad fundamental de gestionar la inocuidad de sus productos y de cumplir con los requisitos relativos a todos los aspectos de los alimentos bajo su control.*

#### **PROPUESTA DE POSICIÓN:**

12. *Los operadores de la industria alimentaria tienen la responsabilidad fundamental de gestionar la inocuidad de sus productos y de cumplir con los requisitos relativos ~~a todos los aspectos de~~ a los alimentos bajo su control.*

#### **OBSERVACIONES O COMENTARIOS:**

Se sugiere eliminar la expresión “*a todos los aspectos de*” debido a que no es claro a que se refiere “*todos*”.

Consideramos que el párrafo queda suficientemente explícito de la siguiente forma:

12. *Los operadores de la industria alimentaria tienen la responsabilidad fundamental de gestionar la inocuidad de sus productos y de cumplir con los requisitos relativos a los alimentos bajo su control.*

### SECCIÓN 3 PRINCIPIOS DE UN SISTEMA NACIONAL DE CONTROL DE LOS ALIMENTOS

#### PRINCIPIO 4 FUNCIONES Y RESPONSABILIDADES

14. *Los consumidores también tienen la responsabilidad de gestionar los riesgos de inocuidad de los alimentos bajo su control, y donde sea pertinente, recibir información sobre la manera de lograrlo.*

#### **PROPUESTA DE POSICIÓN:**

14. *Los consumidores también tienen la responsabilidad de gestionar los riesgos de inocuidad de los alimentos bajo su control, y donde sea pertinente, recibir información **por parte de las autoridades competentes**, sobre la manera de lograrlo.*

**OBSERVACIONES O COMENTARIOS:**

Teniendo en cuenta que el ámbito de aplicación del documento hace referencia a proporcionar orientación a los gobiernos, es preciso aclarar quién es el encargado de brindar la información a los consumidores sobre sus responsabilidades

El párrafo 14 quedaría de la siguiente forma:

*14. Los consumidores también tienen la responsabilidad de gestionar los riesgos de inocuidad de los alimentos bajo su control, y donde sea pertinente, recibir información por parte de las autoridades competentes, sobre la manera de lograrlo.*

**SECCIÓN 3 PRINCIPIOS DE UN SISTEMA NACIONAL DE CONTROL DE LOS ALIMENTOS****PRINCIPIO 12 ARMONIZACIÓN**

*23. Al diseñar y aplicar un sistema de control de los alimentos, la autoridad competente debería considerar, según corresponda, las normas, recomendaciones y orientaciones del Codex como elementos de sus sistemas nacionales de control de los alimentos para proteger la salud del consumidor y garantizar prácticas leales en el comercio de alimentos. También podrían ser de utilidad las normas, recomendaciones y orientaciones de otras organizaciones intergubernamentales internacionales, cuya afiliación está abierta a todos los países.*

**PROPUESTA DE POSICIÓN:**

*23. Al diseñar y aplicar un sistema de control de los alimentos, la autoridad competente debería considerar, según corresponda, las normas, recomendaciones y orientaciones del Codex como elementos de sus sistemas nacionales de control de los alimentos para proteger la salud del consumidor y garantizar prácticas leales en el comercio de alimentos. También podrían ser de utilidad las ~~normas~~, recomendaciones y orientaciones de la **Organización Mundial de Sanidad Animal (OIE)** y la **Convención Internacional de Protección Fitosanitaria (CIPF)**, de conformidad con lo establecido en el **Acuerdo MSF de la OMC, numeral 3 del Anexo A, titulado "Normas, directrices y recomendaciones internacionales"**. ~~otras organizaciones intergubernamentales internacionales, cuya afiliación está abierta a todos los países.~~*

**OBSERVACIONES O COMENTARIOS:**

Se sugiere suprimir en el párrafo la expresión "normas" y precisar que a efectos de las medidas sanitarias y fitosanitarias, de acuerdo con el numeral 3 del Anexo A titulado "Normas, directrices y recomendaciones internacionales", las recomendaciones y orientaciones para los sistemas nacionales de control de los alimentos son las formuladas por las instituciones internacionales de normalización competentes, que corresponde a las "tres hermanas" y "otras organizaciones internacionales competentes" identificadas por el Comité MSF. Es preciso indicar que el Comité MSF todavía no ha identificado ninguna otra organización de normalización competente.

De tal forma que el párrafo 23 quedaría de la siguiente forma:

*23. Al diseñar y aplicar un sistema de control de los alimentos, la autoridad competente debería considerar, según corresponda, las normas, recomendaciones y orientaciones del Codex como elementos de sus sistemas nacionales de control de los alimentos para proteger la salud del consumidor y garantizar prácticas leales en el comercio de alimentos. También podrían ser de utilidad las recomendaciones y orientaciones de la **Organización Mundial de Sanidad Animal (OIE)** y la **Convención Internacional de Protección Fitosanitaria (CIPF)**, de conformidad con lo establecido en el **Acuerdo MSF de la OMC, numeral 3 del Anexo A, titulado "Normas, directrices y recomendaciones internacionales"**.*

**SECCIÓN 4 MARCO PARA EL DISEÑO Y FUNCIONAMIENTO DEL SISTEMA NACIONAL DE CONTROL DE LOS ALIMENTOS****SECCIÓN 4.3 IMPLEMENTACIÓN**

*74. Además se debería incentivar a los operadores de la industria alimentaria a que establezcan o proporcionen acceso a programas educativos y de capacitación pertinentes a sus actividades y responsabilidades. Dichos programas pueden incluir educación formal y/o estudios académicos, cursos de*



capacitación en la industria a nivel de organización o capacitación del personal a nivel de una industria en particular.

#### PROPUESTA DE POSICIÓN:

74. Además se debería incentivar a los operadores de la industria alimentaria a que establezcan o proporcionen acceso a programas educativos y de capacitación pertinentes a sus actividades y responsabilidades. Dichos programas pueden incluir educación formal y/o estudios académicos, ~~entrenamiento~~ ~~o cursos de capacitación en la industria a nivel de~~ **ofrecido por la misma organización o capacitación programas de formación conducidos del personal a nivel de una industria en particular por organismos externos.**

#### OBSERVACIONES O COMENTARIOS:

Se refiere a cambio de forma en la redacción, con el fin de no repetir expresiones dentro del mismo texto.

El párrafo quedaría de la siguiente manera:

74. Además se debería incentivar a los operadores de la industria alimentaria a que establezcan o proporcionen acceso a programas educativos y de capacitación pertinentes a sus actividades y responsabilidades. Dichos programas pueden incluir educación formal y/o estudios académicos, **entrenamiento ofrecido por la misma organización o programas de formación conducidos por organismos externos.**

### SECCIÓN 4 MARCO PARA EL DISEÑO Y FUNCIONAMIENTO DEL SISTEMA NACIONAL DE CONTROL DE LOS ALIMENTOS

#### SECCIÓN 4.3 IMPLEMENTACIÓN

75. Cuando una autoridad competente utilice los servicios de proveedores de tercera parte para aplicar los procedimientos de control, la evaluación de tales proveedores debería realizarse de conformidad con criterios objetivos y antes de estar acreditados a fin de asegurar su competencia. La autoridad competente debería evaluar periódicamente el desempeño de los organismos acreditados oficialmente. La autoridad competente debería iniciar procedimientos para subsanar deficiencias y, según corresponda, permitir que se retire la acreditación oficial.

#### PROPUESTA DE POSICIÓN:

75. Cuando una autoridad competente utilice los servicios de proveedores de tercera parte para aplicar los procedimientos de control, la evaluación de tales proveedores debería realizarse de conformidad con criterios objetivos ~~antes de estar acreditados~~ **ser autorizados** a fin de asegurar su competencia. La autoridad competente debería evaluar periódicamente el desempeño de los organismos ~~acreditados~~ **autorizados** oficialmente. La autoridad competente debería iniciar procedimientos para subsanar deficiencias y, según corresponda, permitir que se retire la ~~acreditación~~ **autorización** oficial.

#### OBSERVACIONES O COMENTARIOS:

Se formula el cambio de términos para ajustarlo al documento que se está elaborando. Ya que el término de “autorización oficial” es utilizado por las autoridades sanitarias para que un organismo desarrolle las actividades de evaluación de la conformidad para la demostración del cumplimiento de un reglamento técnico; mientras que la “acreditación” se refiere al proceso mediante el cual un organismo independiente reconoce la competencia técnica e idoneidad de organismo de certificación e inspección, laboratorios de ensayo y calibración.

El párrafo quedaría así:

75. Cuando una autoridad competente utilice los servicios de proveedores de tercera parte para aplicar los procedimientos de control, la evaluación de tales proveedores debería realizarse de conformidad con criterios objetivos **antes de ser autorizados** a fin de asegurar su competencia. La autoridad competente debería evaluar periódicamente el desempeño de los organismos **autorizados** oficialmente. La autoridad competente debería iniciar procedimientos para subsanar deficiencias y, según corresponda, permitir que se retire la **autorización** oficial.

## SECCIÓN 4 MARCO PARA EL DISEÑO Y FUNCIONAMIENTO DEL SISTEMA NACIONAL DE CONTROL DE LOS ALIMENTOS

### SECCIÓN 4.3 IMPLEMENTACIÓN

79. Según corresponda, la autoridad competente debería:

- *Comunicar a los interlocutores comerciales (autoridades competentes pertinentes) los asuntos e inquietudes en materia de inocuidad de los alimentos.*
- *Participar en intercambios bilaterales con (las autoridades competentes pertinentes), los interlocutores comerciales y las organizaciones internacionales con respecto a los reglamentos de inocuidad de los alimentos y su cumplimiento;*

#### **PROPUESTA DE POSICIÓN:**

79. Según corresponda, la autoridad competente debería:

- *Comunicar a los interlocutores comerciales (autoridades competentes ~~pertinentes~~) los asuntos e inquietudes en materia de inocuidad de los alimentos.*
- *Participar en intercambios bilaterales con (las autoridades competentes ~~pertinentes~~), los interlocutores comerciales y las organizaciones internacionales con respecto a los reglamentos de inocuidad de los alimentos y su cumplimiento;*

#### **OBSERVACIONES O COMENTARIOS:**

Consideramos que es suficiente con mencionar “autoridades competentes” dentro del texto del párrafo 79, para dar a entender que de acuerdo a sus funciones debe efectuar algunas medidas.

El párrafo quedaría así:

79. Según corresponda, la autoridad competente debería:

- *Comunicar a los interlocutores comerciales (autoridades competentes) los asuntos e inquietudes en materia de inocuidad de los alimentos.*
- *Participar en intercambios bilaterales con (las autoridades competentes), los interlocutores comerciales y las organizaciones internacionales con respecto a los reglamentos de inocuidad de los alimentos y su cumplimiento;*

## SECCIÓN 4 MARCO PARA EL DISEÑO Y FUNCIONAMIENTO DEL SISTEMA NACIONAL DE CONTROL DE LOS ALIMENTOS

### SECCIÓN 4.4. VERIFICACIÓN Y EXAMEN DEL SISTEMA

83. *Los programas de control deberían también ser objeto de un monitoreo continuo para asegurar que se alcanzan los objetivos en todas las etapas de la cadena alimentaria, incluida la producción, la manufactura, la importación, la elaboración, el almacenamiento, el transporte, la distribución y el comercio. La evaluación de los programas de control deberían incluir temas tales como:*

- *La eficacia de los procedimientos de control;*
- *La oportunidad de alcanzar los objetivos;*
- *Si el programa cubre las etapas pertinentes en la cadena de producción, tomando en cuenta los factores de riesgo; y*
- *La consideración de tendencias emergentes.*

#### **PROPUESTA DE POSICIÓN:**

83. *Los programas de control **derivados de los sistemas nacionales de control de los alimentos** deberían también ser objeto de un monitoreo continuo para asegurar que se alcanzan los objetivos en todas las etapas de la cadena alimentaria, incluida la producción, la manufactura, la importación, la elaboración, el almacenamiento, el transporte, la distribución y el comercio. La evaluación de los programas de control deberían incluir temas tales como:*

- *La eficacia de los procedimientos de control;*
- *La oportunidad de alcanzar los objetivos;*
- *Si el programa cubre las etapas pertinentes en la cadena de producción, tomando en cuenta los factores de riesgo; y*
- *La consideración de tendencias emergentes.*

#### OBSERVACIONES O COMENTARIOS:

Para mayor claridad, es preciso incluir que los programas de control dependen de los sistemas nacionales de control de los alimentos.

El párrafo quedaría así:

Debe aclararse que los programas 83. *Los programas de control derivados de los sistemas nacionales de control de los alimentos deberían también ser objeto de un monitoreo continuo para asegurar que se alcanzan los objetivos en todas las etapas de la cadena alimentaria, incluida la producción, la manufactura, la importación, la elaboración, el almacenamiento, el transporte, la distribución y el comercio. La evaluación de los programas de control deberían incluir temas tales como:*

- *La eficacia de los procedimientos de control;*
- *La oportunidad de alcanzar los objetivos;*
- *Si el programa cubre las etapas pertinentes en la cadena de producción, tomando en cuenta los factores de riesgo; y*
- *La consideración de tendencias emergentes.*

#### MALAYSIA

Malaysia supports the adoption of the Draft and Proposed Draft Principles and Guidelines for National Food Control Systems at Step 8 and 5/8 by the 36<sup>th</sup> Session of the Commission with the following further amendments:

#### **Principle 8, para 19:**

*19. To prevent and when necessary to respond to food safety incidents a national food control system should encompass the core elements of prevention, intervention and response.*

#### **Comments:**

We strongly feel that the original text “*To prevent or to react to food safety incidents a national food control systems should encompass the core elements of prevention, intervention and response.*” (previous draft in CX/FICS 13/20/3) is more appropriate, in view that food safety incidents should be given immediate attention and be addressed with urgency.

#### **Section 4.1, para 31:**

*31. Public policy decisions should take into account a broad range of factors and require a careful assessment of options. Governments should consider, among other things, stakeholder interests, how the food control system will relate to international and national standards, assessment of risks and/or benefits, effectiveness and efficiency of various controls and methods of oversight, existing and planned government structures, coordination among authorities along the food chain, technical and scientific information, the roles of government and food business operators, and best practices/models.*

#### **Comments:**

We propose to use the term ‘Policy’ instead of “Public policy” in this para and throughout the guideline, in view that policies are developed not only in the interest of the public. This is also for consistency with the Section title.

**Section 4.1, para 33:**

33. *National goals and priorities will ensure consumer protection by taking into account amongst other things, food production and consumption patterns, risk profile and consumer concerns in relation to food safety and fair practices in the food trade and also the preparedness and capability of the country.*

Malaysia's Comments:

We do not feel that the phrase "...and fair practices in the food trade and also the preparedness and capability of the country.", is relevant in this para since these have no direct relation with ensuring consumer protection.

**Section 4.2, para 62:**

62. *The national food control system should have procedures covering the prompt removal of unsafe food<sup>15</sup>. Setting up these procedures is the primary responsibility of food business operators and they should ensure that products that are deemed to be unsafe should be recalled, appropriately dealt with to ensure consumer protection. The competent authority should ensure appropriate consumer notification is carried out when distribution has occurred.*

**Comments:**

In our view, setting up of procedures for removal of unsafe food should be the responsibility of competent authorities, while food business operators are responsible for their execution.

**Section 4.2, para 63:**

Malaysia's Comments:

To insert the words 'food business operators...' for clarity and consistency. Therefore, para 63 will read as follows:

*63. Recall systems and other market withdrawal systems should be a coordinated effort between the competent authority and food business operators and be effective and enforceable. If the competent authority requires or requests a recall, food business operators should have an affirmative duty to give effect to established procedures to recover recalled products and to destroy or dispose of them properly. National laws should include penalties or sanctions for companies that fail to comply with recall requests.*

**UNITED STATES OF AMERICA**

The United States of America supports the adoption of the *Draft and Proposed Draft Principles and Guidelines for National Food Control Systems* at Steps 8 and 5/8. We believe the document provides very important information to countries in the design and implementation of national food control systems. We appreciate the work of CCFICS in developing this document that will be of significant importance in helping to ensure food safety.

**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 <i>Standard for Named Vegetable Oils</i> , at Step 5/8 (REP13/FO para. 89, Appendix III)
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*Comments of Egypt*

**EGYPT**

Egypt support the adoption of the Amendment to Parameters for Rice Bran Oil in the *Standard for Named Vegetable Oils*, at Step 5/8.

**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 Argentina, Costa Rica, Egypt, India*

Argentina, Egypt, India support the adoption of the draft Principles at Step 8

**COSTA RICA**

Costa Rica would like to propose the substitution throughout the document the phrase ~~specific methods~~ for **performance parameters**.

In this sense, Costa Rica, agree to the advancement of the document at Step 8.

**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 Costa Rica, Egypt, European Union, India, Kenya*

Costa Rica, Egypt, India and Kenya support the adoption of the Food Additive Provisions of the *General Standard for Food Additives* (GSFA) (CODEX STAN 192-1995), at Steps 8 and 5/8

**EUROPEAN UNION**

The EU supports the adoption of the food additive provisions of the General Standard for Food Additives. However, the EU would like to introduce a general reservation to the adoption of all the provisions for aluminium containing food additives and would like to stress the importance it attaches to further restricting the exposure to aluminium from food additive uses (including aluminium lakes of colours and food additives containing aluminium impurities). The EU would also like to stress the necessity to seek alternatives to aluminium as a food additive.

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 Colombia, Costa Rica, Egypt, India, Kenya*

Costa Rica, Egypt, India and Kenya support the adoption of the draft Amendments at Step 5/8.

**COLOMBIA**

Ante las propuestas de cambios y adiciones al SIN; Colombia presenta los siguientes comentarios:

Para la sección 3 y 4: SISTEMA INTERNACIONAL DE NUMERACIÓN DE ADITIVOS ALIMENTARIOS.

Parte 2. Adicionales funciones tecnológicas y eliminaciones. (Los cambios se indican en **negritas**, las eliminaciones en ~~tachado~~)

SIN	NOMBRE ADITIVO	COMENTARIOS
327	Lactato de calcio	Colombia sugiere la inclusión de la función tecnológica <b>acondicionador de masa</b> , pues se encuentra reportada en la monografía del JECFA y en el documento CAC/GL 36-1989.

		En cuanto a la función de agente endurecedor, Colombia está de acuerdo con dicha adición y sugiere la actualización de la monografía del JECFA para éste aditivo
330	Ácido cítrico	Colombia solicita aclaración con relación a la función tecnológica “agente de retención del color” para éste aditivo, ya que ni en el FCC, ni en la monografía del JECFA aparece listada.  Además, solicitamos se nos informe si al hacer referencia a esa función tecnológica se está contemplado la inhibición del pardeamiento enzimático en frutas y derivados.  Adicionalmente, sugiere la inclusión de la clase funcional y función tecnológica “secuestrante”.
555	Silicato de potasio y aluminio	Colombia sugiere revisar la NGAA pues dicho aditivo no se encuentra referenciado; sin embargo si cuenta con monografía del JECFA y recomendaciones de uso.
508	Cloruro de potasio	Si bien es cierto que ésta clase funcional no es aplicable para éste aditivo, a fin de armonizar la NGAA, el FCC y las especificaciones del JECFA, Colombia sugiere revisar la monografía del JECFA para éste aditivo, pues dicha función si aparece citada.

Specifications for the Identity and Purity of Food Additives arising from the 76<sup>th</sup> JECFA meeting, at Step 5/8 (REP13/FA para. 125, Appendix X)

*Comments of Costa Rica, Egypt, European Union, India, Kenya*

Costa Rica, Egypt, India and Kenya support the adoption of the Specifications at Step 5/8.

#### **EUROPEAN UNION**

The EUMS do not object to the adoption of the specifications for the identity and purity of food additives arising from the 76th JECFA meeting. However, the EUMS would like to express a general reservation to the JECFA 76 specifications as food additive specifications should be related to the substances and not to the preparations.

**Committee on Sugars  
Comité sur les sucres  
Comité sobre**

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

*Comments of Malaysia*

#### **MALAYSIA**

Malaysia has no objection to the adoption of the proposed draft Standard for Non-Centrifugated Dehydrated Sugar Cane Juice at Step 5/8 by the 36<sup>th</sup> Session of the Commission. Nevertheless, we wish to propose the following editorial amendments:

##### **3.1.1 Basic Ingredients**

Malaysia propose to replace “Sugar cane juice *Saccharum Officinarum L.*” to “(*S.officinarum L.*) juice”.

##### **3.2.4 Physical and chemical characteristics**

Malaysia recommends that the term “ashes” be replaced with the term “ash”.

**Table 1. Physical-chemical requirements for solid non-centrifugated dehydrated sugar cane juice.**

Requirement	Value	
	Min.	Max.
Moisture, mass fraction %	-	9.0
Ashes Ash, mass fraction %	0.8	-
Total sugars (saccharose), mass fraction %	75.0	83.0
Reducing sugars (glucose), mass fraction %	5.5	10.0
Protein % (N x 6.25)	0.2	-
Potassium mg/100g	100.0	-
Calcium mg/100g	10.0	-
Phosphorous mg/100g	5.0	-
Iron mg/100g	1.5	-

**Table 2. Physical-chemical requirements for granulated non-centrifugated dehydrated sugar cane juice.**

Requirement	Value	
	Min.	Max.
Moisture, mass fraction %	-	5.0
Ashes Ash, mass fraction %	1.0	-
Total sugars (saccharose), mass fraction %	84.0	93.0
Reducing sugars (glucose), mass fraction %	4.5	7.0
Protein % (N x 6.25)	0.2	-
Potassium mg/100g	100.0	-
Calcium mg/100g	10.0	-
Phosphorous mg/100g	5.0	-
Iron mg/100g	1.5	-

## 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 Egypt, France*

#### *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)*

##### EGYPT

Referring to your document "CL 2012/31-FFP October 2012 Amendments to the Standard for Live and Raw Bivalve Molluscs (292/2008) and the code of practice for Fish and Fishery products (52/2003) Appendix 11.

Egypt proposes that although only up to 2% of samples from areas managed for HDHC are tested as positive for salmonella and resulting in few outbreaks; which may involve relatively small numbers of consumers. But even with such relatively low probability of Salmonellosis, Egypt insists on carrying out the analysis for detection salmonella as that would add further protection to the consumer even with the existence of the wide umbrella that is provided with the shellfish sanitation programs that would detect unacceptable lots at ratio of 9.5% .

Accordingly, Egypt refuses to remove the detection of salmonella( the criterion for salmonella ) from section I-6.5 and I-8.5 , II-8.7 ; which constitutes added protection and avoid fraud for consumer .

#### *Amendments to 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)*

Egypt supports the adoption of amendments to Sections 7.1 and 7.2.2.2 to the Code of Practice for Fish and Fishery Products (CAC/RCP52 – 2003)

##### FRANCE

Section 7.1, par. 4 Afin de maîtriser les dangers, l'identification et la surveillance des zones conchylicoles sont très importantes pour **s'assurer de** la salubrité des mollusques bivalves.

[...] Si on détecte des biotoxines dans la chair des mollusques bivalves en quantités dangereuses, la zone conchylicole sera interdite pour la récolte jusqu'à ce ~~qu'une étude toxicologique~~ **que des analyses de toxicité** ait démontré clairement que la chair des mollusques ne contient pas de biotoxines en concentrations dangereuses.

Amendment to the *Standards for Certain Canned Citrus Fruits, Preserved Tomatoes and Processed Tomato Concentrates* (section 4 – food additives) (REP13/PFV paras 123-124, Appendix IV)

*Comments of Egypt*

Egypt support the adoption of the amendments to the standards for certain Canned Fruits, Preserved Tomatoes, and Processed Concentrates (Section 4 – food additives)



**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 Argentina, Brazil, Colombia, Costa Rica, Egypt, India, Kenya, Paraguay, United States of America*

Argentina, Brazil, Costa Rica, Egypt, India, Kenya, Paraguay and the United States of America support the adoption of the amendments.

**COLOMBIA**

Colombia manifiesta su adhesión, para que se realicen las enmiendas propuestas en la 20ª reunión del comité, plasmadas en el documento CX/FICS 13/20/6 y para su respectiva adopción en el Trigésimo sexto Período de Sesiones de la Comisión del Codex Alimentarius.

Colombia está de acuerdo en realizar las modificaciones al documento CAC/GL 19-1195, relativas a la aclaración del término pienso (como el que se refiere tanto a piensos (alimentos para animales) como a ingredientes de los piensos), tal y como se define en el Código de Prácticas para la Buena Alimentación Animal (CAC/RCP 54-2004)", y

Trasladar las enmiendas referentes a: la obligación de indicar la naturaleza específica del problema vinculado a los piensos y su efecto en la inocuidad de los alimentos (del párrafo 9 al 7a), y la obligación de identificar el pienso vinculado a la emergencia relativa a la inocuidad de los alimentos (del párrafo 12 al 9) del documento CAC/GL 19-1195.

Adicionalmente se recomienda tener en cuenta lo dispuesto en la NORMA GENERAL DEL CODEX PARA LOS CONTAMINANTES Y LAS TOXINAS PRESENTES EN LOS ALIMENTOS Y PIENSOS - CODEX STAN 193-1995 - *ÁMBITO DE APLICACIÓN* - *La presente Norma contiene los principios recomendados por el Codex Alimentarius en relación con los contaminantes y las toxinas presentes en los alimentos y piensos; se indican también los niveles máximos y planes de muestreo relacionados de los contaminantes y las sustancias tóxicas naturales que se encuentran en los alimentos y piensos que, por recomendación de la Comisión del Codex, deben aplicarse a los productos que circulan en el comercio internacional.*

*Esta norma comprende únicamente niveles máximos de contaminantes y sustancias tóxicas naturales que se encuentran en los piensos en los casos en que el contaminante en los piensos puede ser transferido al alimento de origen animal y que pueden ser pertinentes para la salud pública.*

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

Amendments to the *Standards for Edible Fats and Oils not Covered by Individual Standards* (CODEX STAN 19-1981), *for Named Animal Fats* (CODEX STAN 211-1999) and *for Olive Oils and Olive Pomace Oils* (CODEX STAN 33-1981) (REP13/FO paras 29-34, Appendix II)

*Comments of Egypt*

**EGYPT**

Egypt supports the proposed Amendments to the *Edible Fats and Oils not covered by Individual Standards* (CODEX STAN 19-1981), *for Named Animal Fats* (CODEX STAN 211-1999) and *for Olive Oils and Olive Pomace Oils* (CODEX STAN 33-1981)

Amendments to the lists of acceptable previous cargoes in the *Code of Practice for the Storage and Transport of Edible Fats and Oils in Bulk* (CAC/RCP 36-1987) (REP13/FO paras 22-24I)

*Comments of Egypt*

**EGYPT**

Egypt supports the proposed Amendments to the lists of acceptable previous cargoes in the *Code of Practice for the Storage and Transport of Edible Fats and Oils in Bulk*.

**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 Argentina, Argentina, Egypt, India*

Argentina, Egypt and India support other Amendments to Methods of Analysis in Codex Standards at Different Steps

Proposed Amendment to the Guidelines for Establishing Numeric Values for Method Criteria and/or Assessing Methods for Compliance Thereof in the Procedural Manual .

*Comments of Argentina, Egypt, India*

Argentina, Egypt and India support the proposed Amendments to the Guidelines.