

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Items 3(a)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME FAO/WHO COORDINATING COMMITTEE FOR ASIA

*Seventeenth session
Yogyakarta, Indonesia, 22-26 November 2010*

INDIA'S COMMENTS

Agenda Item No. 3 (a): Proposed Draft Standard for edible sago flour (N06-2007)

The Agenda covers a proposed draft standard for sago flour, which is at step 6, has been examined and the following comments are proposed by NCCP for consideration by the 17th session of CCASIA.

Description (section 2), Product definition (subsection 2.1):

India like to suggest this new product definition:

“ Edible sago Flour is the product derived from the pith or soft core of sago palm tress (Metroxylon sp.) through the process of extraction, purification and dehydration”.

Rationale:

The process definition mentioned in the agenda includes mechanical process which is now replaced by commercial process in many countries, therefore, the use of term extraction, refinement and dehydration is more generalized.

Essential Composition and Quality Factors (section 3), Quality Criteria- General (subsection 3.1):

India would like to propose the following new text:

- It shall be free from added colour and flavour.

Rationale:

The explanation includes all the specific terms related to quality criteria of the product.

Subsection 3.1.2.

India proposes to delete 3.1.2 as modified point is well explained in 3.1.1

Quality Criteria Section 3.2.

Although, standards for Sago flour are not prescribed in our National standards but the standards are specified for Sago, which is a related product. India proposes the Ash content to be 2.0% maximum as sago flour is rich in starch and have the same thickening ability as tapioca flour.

Parameters	Proposed Codex Standards	PFA	PFA (Related product SAGO)
Moisture Content	13% m/m max	Non-existent	
Ash Inorganic extraneous matter	0.5% m/m max	Non-existent	Not more than 0.4%
Acidity (ml NaOH 1 N/100 g)	4 max	Non-existent	
Starch content	60% m/m min	Non-existent	
Crude fiber	0.10%	Non-existent	
Particle size	not less than 95% flour shall pass through a 100 mesh sieve	Non-existent	
Other starches	0	Non-existent	
Total insoluble ash (dil HCl)	Not mentioned	Non-existent	Not more than 0.1%

As per the 42nd session of CCFA, the maximum level of treatment of chlorine dioxide in sago flour should be 30 mg/kg to be consistent with JECFA evaluation.

Agenda Item No. 4 (b): Proposed Draft Regional Standard for chili sauce (N05-2007)

India would re-iterate its stand to calculate TSS and various methods have been made available to determine TSS in chilli sauce as Total soluble solids is important in determining the consistency of the product. The TSS content has been specified in our National standard for chilli sauce.

Agenda Item No. 5: Status of implementation of the strategic plan for the CCASIA 2009-2014

India would like to extend its thanks to Malaysia for preparing the draft strategic plan for CCASIA.

India is of opinion that strategic plan for CCASIA is in line with the objectives of the agenda and further strengthens the effectiveness of the FAO/WHO coordinating committees for ASIA in fulfilling its responsibilities to its member countries and its contribution to the work of the Codex Alimentarius Commission.

The draft has considered the diverse needs of developing countries and prioritises them in strengthening the capacity building programmes through technical exchange programmes, trainings, seminars, workshops etc.

The draft as a whole provides an insight to all the developing countries who wishes to start a National Codex Contact Point, strategies to develop learning materials, strengthening scientific and technical committees to provide comments, promotion of use of codex standards, developing or reviewing codex standards, e-communication etc.

Agenda item No. 7: National Food Control Systems and consumer participation in Food Standard Setting (CL 2010/17-ASIA)

Annex 1

Template for the submission of information on National food control systems and consumer participation in food standard setting of CCASIA countries

Question 1: Strengthening National Food Regulatory Systems

Structure and organization responsible for National Food Control System is Food Safety and Standards Authority of India under Ministry of Health and Family Welfare, Government of India. The consultative structures Codex matters includes government organizations in the field of Agriculture, Commerce, Food Processing, Consumer Affairs, Women and Child Development, Science and Technology, Indian industries with increased involvement and participation of consumer organizations such as VOICE and other stakeholders.

There is a need for capacity building and training to strengthen the national food control system and promotion of good import practice in the country so as to facilitate trade of safe and quality food as well as more efficient networking of the Food Safety surveillance systems in the country.

Question 2: Promotion of Codex Standards and related texts

In India, developments in Codex have always been considered as a valuable guiding factor in developing our national standards/regulatory approach. There has been a growing trend in Codex meetings to organise meetings of the different working groups and to hold informal meetings for reaching consensus on complex issues and issues of countries economic interest. India has been endeavoured to participate in these meetings which has facilitated in validating country stand.

The Codex Standards and related texts are always taken into consideration before finalization of any National standard, new or amended, with due attempt towards harmonization of national standards with that of Codex. Non harmonization of National Standards with that of Codex is only considered when there are adequate scientific justifications and rationale e.g. the consumption pattern of Indian population.

No significant difficulties are encountered in the use or application of Codex Standards or related text so long the scientific basis and rationale are considered valid by the Scientific Expert Groups in the country responsible for formulating the standards of food.

Question 3: Strengthen Communication and Coordination

This is carried out by holding series of shadow committee meetings among members including consumers on issues related to Codex matters in order to rationalise India's view points at national level as well as interaction international level. Evaluation data on pesticide residues of various food commodities were sent to JMPR e.g residues of Fenprothrin in Tea. Interactive meetings have also been held at country level on some contentious issues e.g. unduly stringent level of pesticide residues in food adopted by certain countries contrary to the principle of ALOP.

The participation brought back many useful inputs from the sessions so as to rationalize formulation of National Guidelines.

There are number of technical expert groups on various food safety issues, horizontal as well as vertical who are participate in the meetings under the Central Committee of Food Standards (CCFS). During these meetings issues related to harmonization of national standards with that of Codex are also deliberated alongwith the national data generated by relevant experts in the country.

Question 4: Training and Capacity Building

There is an urgent need to conduct various training and capacity building programmes in order to strengthen the functioning of Codex and make consumers too aware of various up-coming food standards. The following training programmes can be conducted:

1. Fortification regulation
2. HACCP with implementation of various code of Practices
3. SPS capacity building programmes
4. Food Labels and Health claims
5. Food Safety Promotion Network
6. Food inspection

Question 5: Regional Strategic Plan- Priority Areas for Implementation

Question 6: Codex Standards-National Priorities, Interests and Training Needs

There is a need for capacity building and training to strengthen the national food control system and promotion of good import practice in the country so as to facilitate trade of safe and quality food as well as more efficient networking of the Food Safety surveillance systems in the country.

Question 7: Any Other Matters

Agenda Item 10: Use of Codex standards at national and regional level (CL 2010/14-ASIA, Part A)

PART A. USE OF CODEX STANDARDS AT NATIONAL AND REGIONAL LEVEL

i. Use of Codex standards and related texts at the national and regional level

The codex standards have proven to be very useful especially as a point of reference in developing national standards. India believes that harmonisation of national food standards with that of codex is the key to facilitate international trade along with protection of the health of the consumers. The Codex Standards and related texts are always taken into consideration before finalization of any National standard, new or amended, with due attempt towards harmonization of national standards with that of Codex .

ii. Non-use of Codex standards and related texts at the national and regional level, with reasons where applicable

Non harmonization of National Standards with that of Codex is only considered when there are adequate scientific justifications and rationale e.g. the consumption pattern of Indian population.

iii. Difficulties encountered in the use or application of Codex standards and related texts at the national and regional level

No significant difficulties are encountered in the use or application of Codex Standards or related text so long there is valid scientific basis and rationale by the Scientific Expert Groups in the country responsible for formulating the standards of food.

iv. Relevance of Codex standards and related texts as a basis for harmonization of legislation and regulations, including in the perspective of economic integration

Codex has always been of prime importance to developing countries like- India for developing national standards/regulatory approach. There has been a growing trend in Codex meetings to organise meetings of the different working groups and to hold informal meetings for reaching consensus on complex issues and issues of countries economic interest. India has been endeavoured to participate in these meetings which has facilitated in validating country stand.

India strongly believes that Codex standards and related text are relevant as a basis for harmonisation of legislation and regulations. The Codex standards and related text have been formally recognized by the World Trade Organization (WTO) as the international reference points for resolving food trade disputes in international trade. The dual mandate of Codex, i.e. consumer safety and facilitation of food trade, emphasize the need for harmonization of legislation and regulations. India is

one of the few countries to move forward with the implementation of nutritional labelling based on the initiatives taken in sessions of Codex Committee on Food Labelling.

v. Any other health and/or trade problems related to standardization at the national or regional level

The Trade problems associated with standardization of national and regional level are reviewed in a timely manner and requisite amendments if needed are incorporated in the standards so as to reduce the trade barrier.

Agenda Item 11: Nutritional issues within the region (CL 2010/14-ASIA, Part B)

Interactive meetings with various stakeholders viz. various ministries, industries and consumer organization are held with the issues that are included in the agenda for the regional committee meeting as well as in the international organizations. For instance currently Ministry of Health and Family Welfare has introduced mandatory nutrient declaration on pre-packaged foods to include nutrients of concern in order to comply with the WHO Strategy towards prevention of non-communicable diseases i.e Obesity, type 2 diabetes and cardio vascular diseases.