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JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

**Thirty- Fifth Session
Arusha , Tanzania
17-21, March 2003**

Government of India position

ON

Agenda no. 7(c), 7(d), 10(a), 14(c), 15(b),16(a), 16(b), 16(f),16(g),16(f)

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Agenda Item 7(c)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

INDIA

Agenda Item 7 (c) – Proposed Draft Revised Food Category System of the Codex General Standard for Food Additives (CX/FAC 03/7):

India welcomes the inclusion of food products such as Lassi, Khoa, Traditional Milk-based Sweets, Tamarind concentrate, Tamarind powder, Fruit bars, Picked fruits and Pickled vegetables, Chilli paste, Paneer, Bhujjiya and Papad.

The general details of Standards/ Specifications for each of these products is given below:

1. *Lassi*: included in FCS – 01.1.2

- Liquid obtained by whipping curd from lactic acid fermentation of milk

Ingredients: Curd, water, sugar/ synthetic sweetener

Standards:

- (i). Shall be free from added foreign matter including starch except sugar and synthetic sweetener.
- (ii). The fat obtained shall conform to milk fat.
- (iii). Pesticide residue on fat basis shall conform to codex limit for milk on fat basis.

2. Khoa: included in FCS – 01.3.1

- Khoa is cow or buffalo milk concentrated by boiling

Ingredients: Milk, desiccated milk

Standards:

- (i). Milk fat not less than 30% on dry weight basis.
- (ii). Free from added starch.
- (iii). Free from added sugar.
- (iv). Free from colouring matter.
- (v). Pesticide residues below the limit under codex for milk on fat basis.
- (vi) Total solids %: Min. 65
- (vii) Fat % (on dry basis): Min. 30
- (viii) Free from pathogens and added colour.

3. *Traditional Milk-based Sweets:* such as Peda, burfi, milk cake, gulab jamun, rasagulla, rasamalai, basundi are included in FCS - 01.7

- a) Peda: Product obtained from Khoa, sweeteners and other optional ingredients like nuts, flavours and colours.

Standards:

- i. Shall be free from added starch
- ii. Shall contain only milk fat

b) Burfi/ Milk cake:

- A product obtained from khoa and sugar. It may contain preservatives and flavouring substances permitted under Codex for dairy products.

Standards:

- i. Total solids % by wt.: Min. 85
- ii. Total ash % by wt: 10
- iii. Ash % by wt.: Max. 3
- iv. Moisture, % by wt: Max. 15.0 (Mawa burfi and other types)
- v. Milk fat, % by wt.: Min. 12.5 (Mawa burfi) and 10.0 (other types)
- vi. Lactose, % by wt.: Min. 15.0 (Mawa burfi) and 12.0 (other types)
- vii. Sucrose (on dry basis) %: Max. 48.0 (Mawa burfi) and 40.0 (other types)
- viii. Acidity, percent by wt.: Max. 0.35 (Mawa burfi) and 0.45 (Other types)
- ix. Standard plate count per gm.: Max. 30000 (Mawa burfi and other types)

- x. Yeast and mould count per gm.: Max. 10 (Mawa burfi and other types)

c) Gulab jamun:

- shall be prepared from khoa, skimmed milk powder, milk powder, ghee, cream, butter or other milk solids. It may contain maida, citric acid and baking powder. It shall be free from dirt, insects and mould growth. The gulab jamun should be uniform in colour, shape and shall have good flavour and appropriate texture.

Standards:

- (i) Total solids % by wt.: Min. 70
- (ii) Fat% by wt.: Min. 8.00
- (iii) Protein% by wt.: Min. 8.00
- (iv) Free from pathogens, coliform, and added colour
- (v) Moisture % wt.: Max. 30.00
- (vi) Concentration of sugar in syrup % by mass: Min. 40.00

Note: All the requirements are on 'as is' – basis.

Standards for Gulab jamun syrup:

- i. Acidity of the syrup ml of 0.1N NaOH required to neutralize 100 ml of syrup: Max. 6.00
- ii. Concentration of syrup: Min. 62.4° Brix

d) Rasagulla:

-Product obtained from milk solids by acidification of milk.

Standards:

- i. Shall not contain any added starch.
- ii. Fat obtained from the product shall conform to milk fat
 - BRR at 40⁰ C: 40 – 45
 - RM value: Min. 24
 - FFA as Oleic acid: Max. 3.0 %
- iii. It may contain preservative permitted under codex for dairy products.
- iv. Shall be free from added colour
- v. Fat % by wt.: Min. 5.00
- vi. Total Solids % by wt.: 45
- vii. Protein % by wt.: Min. 5.00
- viii. Free from pathogens
- ix. Moisture % by wt.: Max. 55.00
- x. Sucrose % by wt.: Max. 45.00

Note: All the requirements are on 'as is' – basis.

Standards for Rasagulla Syrup:

Acidity ml of N/10 NaOH required to neutralize 100 ml of the syrup: Max. 6.00
Concentration of syrup: Max. 55° Brix
Bacterial Count/gm: Max. 500
Coliform Count/ gm: Nil

4. a) **Tamarind concentrate:** included in FCS – 04.1.2.8

The product shall be derived from tamarind fruits; the tamarind fruit extract shall be free from insects, fibres and seeds. The concentrate shall have characteristic flavour, free from burnt or any other objectionable flavour and taste.

Standards:

- i. Acidity as tartaric acid % by wt.: Min. 9.0.
- ii. Total soluble solids % by wt.: Min. 65.0
- iii. Free from moulds, insects, insect fragments

b) **Tamarind powder:**

- Prepared from tamarind fruit and edible starches like tapioca. It shall be free-flowing powder.

Standards:

- i. Acidity as tartaric acid % by wt.: Min. 9.0
- ii. Ash insoluble in dil. HCl % by wt.: Max. 0.50
- iii. Quantity of starch to be declared on the label.

c) **Fruit bars:**

- A mixture of fruits (mango, pineapple, guava) pulp mixed with sugar, flavours and preservatives and dried into a sheet.

Standards:

- i. Shall be free from added starch
- ii. Shall be free from pathogens

Additives: Permitted stabilizers, synthetic colours, synthetic sweeteners

5. **Pickled ginger, pickled garlic and chilli pickles:**
included in FCS – 04.2.2.3

- The pickles shall possess a good uniform colour and appearance, shall be practically free from defects shall possess a good texture and normal characteristic taste and flavour typical of the fruit.

Ingredients:

Vegetables

- i. Salt
- ii. Oil
- iii. Spices

Standards:

- i. Pickles in brine: Salt not less than 10.0% for pickles in brine, acidity as citric acid not less than 1.2% in pickles in citrus juice. Permitted preservatives allowed.
- ii. Pickles in vinegar: Acidity as acetic acid in covering liquid not less than 2.0%. Citric acid allowed, sugar, spice, dried fruits, green and red chillies, ginger, dry fruits. Drained weight not less than 60.0%. Free from copper, alum, mineral acid and added colours. Shall show no sign of fermentation and shall be reasonably free from sediment, permitted preservatives allowed.
- iii. Pickles in oil: Fruit/ vegetable content not less than 60.0%, pickle to be covered with oil.
Benzoic acid – 250 ppm
Or Sulphur dioxide – 100 ppm

6. **Chilli paste: included in FCS – 12.2**

- Dry red chillies soaked in water and ground to paste form along with salt and other spices.

Optional ingredients: Onion, garlic, salt, oil, pepper, mustard, cloves, cinnamon, etc.

The chilli paste shall be prepared and packed in hygienic conditions; it may contain permitted preservatives, processing aids, and antioxidants.

7. **Paneer: included in FCS – 12.9**

Paneer is a milk protein coagulated by the addition of citric acid from lemon or lime juice or of lactic acid from whey, that is strained into a solid mass, and is used in vegetarian preparations such as – aloo paneer, mutter paneer, and edible caseinates. Paneer shall be clear and free from dirt, surface discolouration, insects and moisture, with mild acidic flavour; it shall have closely knit smooth texture, firm, cohesive & spongy body.

The coagulate such as lactic acid, citric acid and their sodium and potassium salts shall be of food grade and free from toxic substances.

Preservatives:

Sorbic acid/ sorbates, propionic acid/ propionates may be added to the extent of 2000 mg/kg; nisin may also be added.

Standards:

- i. Moisture % by wt.: Max. 70.0
- ii. Milk fat (of dry matter): Min. 50.0

8. a) Bhujiya (Namkeen): included in FCS – 15.1

Deep fried and roasted or mixture thereof, of snack foods are popular in India. Namkeen are available in various forms and common names are: Bikaneri, bhujiya, aloo bhujiya, sev, moong dhal, dalmoth, kashmiri mixture, khatta meetha mixture, navaratan mixture, etc. Bhujiya is prepared by kneading besan with water and frying in suitable oil/ fat or combination thereof. Salts, spices and other optional ingredients are added either at the time of kneading or after frying. Salted and spiced fried dhal, chiwda are made by frying the rice flakes in vegetable oil/ hydrogenated fat.

Standards:

- i. Moisture % by wt.: Max. 5.0
- ii. Acid insoluble ash (dry basis) % by wt.: Max. 0.1
- iii. Fat (on dry basis) % by wt.: 15-45
- iv. Acid value of extracted fat: Max. 2.0
- v. Peroxide value: meq oxygen/kg fat: Max. 10
- vi. Total bacterial count per gm: Max. 50,000
- vii. Coliform count per gm: Max. 10
- viii. E.coli per gm: Absent
- ix. Salmonella per 25 gm: Absent
- x. Shigella per 25 gm: Absent

b) Papad: included in FCS – 15.1

Papads are prepared from soaked rice flour or from black gram or cow pea flour, mixed with salt and spices, and formed into flat cakes. Papads shall be manufactured and dried under hygienic conditions. Papads shall be in the form of thin circular discs having diameter ranging from 5 to 25 cm. The thickness shall be 0.3 to 1.2 mm for papads while for sago papads it shall be between 1.0 to 1.5 mm. Papads shall be of pleasant taste and smell, and shall be free from rancid or bitter taste and shall not crumble. They shall be free from broken or frayed edges, excessive number of holes, dirt or foreign matters, insect infestation or fungal growth. On frying, papad shall be brittle (break easily) and crispy to bite. They shall not give leathery, gritty, sticky or soggy mouth feel.

Standards:

- i. Moisture % by wt.: 12.5 – 15.0
- ii. Total ash (dry basis) % by wt.: Max. 12.0
- iii. Acid insoluble ash (dry basis) % by wt.: Max. 0.25
- iv. Alkalinity of ash as sodium carbonate (on dry basis) % by wt: Max. 2.3
- v. pH of water extract: Max. 8.5
- vi. Crude fibre (on dry basis) % by wt.: Max. 1.5
- vii. Fat % by wt. (dry basis): Max. 3.0

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Agenda Item 7(d)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

INDIA

Agenda Item 7 (d) - Comments Submitted on the Proposed Draft and Draft Revisions to Table 1 of the Codex General Standard for Food Additives in Response to CL 2002/10-FAC and CL 2002/44-FAC (CX/FAC 03/8):

India would like to mention that CCFAC in its 34th Session agreed that as a matter of principle, food additives assigned a numerical ADI by JECFA should have a numerical limitation in the GSFA. In the case of Carnauba wax, JECFA has fixed numerical ADI (0-7). However, in the draft GSFA table-1, maximum level for the use of carnauba wax on surface treated fresh fruit (04.1.1.2) and surface treated fresh vegetables (04.2.1.2) and similar other food categories has been mentioned as GMP. In the recommendations of Quality Control Working Group for Additives (Appendix II), maximum level of use of carnauba wax on the above food products has also been mentioned at GMP level. There should be consistency in approach and the additives, which are provided numerical ADI by JECFA should not be allowed to use as GMP level.

However, the methodology for the detection/determination of carnauba wax in presence of non-food grade waxes is not available. In view of this, India proposes for deferring the application of carnauba wax on fresh fruits & vegetables till data on full toxicological evaluation including those on hydrolysis products of the carnauba wax is made available.

In addition, India propose that the food products, which are included in Draft Food Category Descriptors, the following food additives mentioned in Table 1, may be permitted:

Sl. No.	Food Category Number	Food Products	Additives required/ Comments
1.	01.1.2	Lassi	a) Synthetic sweeteners mentioned in Table 1 may also be extended for Lassi as other food products in 01.1.2 are already permitted to contain synthetic sweeteners.
			b) Emulsifiers/ stabilizers/ thickeners mentioned in Table 1 may also be extended for Lassi as other food products in 01.1.2 are already permitted to contain these additives.
			c) Natural and synthetic food colours mentioned in Table 1 may also be extended for Lassi as other food products in 01.1.2 are already permitted to contain natural and synthetic colours.
			d) Preservatives like sorbates mentioned in Table 1 may also be extended for Lassi as other food products in 01.1.2 are already permitted to contain preservatives.
			e) Acidity regulators mentioned in group 01.1.1.2 may also be extended for Lassi in group 01.1.2 to regulate the acidity in Lassi.
2.	01.3.1	Khoa	a) Antioxidants like BHA, TBHQ, gallates may be permitted at 0.02 % on fat basis; this addition will prevent oxidative spoilage of the product.
3.	01.7	Traditional Milk-based sweets such as peda, burfi, milk cake, gulab jamun, rasagulla, rasamalai, basundi, etc.	a) Synthetic sweeteners mentioned in Table 1 may also be extended for traditional milk-based sweets as other food products in 01.7 are already permitted to contain synthetic sweeteners.
			b) Natural and synthetic food colours mentioned in Table 1 may also be extended for traditional milk-based sweets as other food products in 01.7 are already permitted to contain natural and synthetic food colours

			<p>c) Preservatives like benzoates and sorbates mentioned in Table 1 may also be extended for traditional milk-based sweets as other food products in Natural and synthetic food colours are already permitted to contain preservatives.</p> <p>d) Antioxidants like BHA, TBHQ, gallates may be permitted at 0.02 % on fat basis; this addition will prevent oxidative spoilage of the product.</p>
4.	04.1.2.8	Fruit Bars	<p>a) Synthetic sweeteners mentioned in Table 1 may also be extended for Fruit bars as other food products in 04.1.2.8 are already permitted to contain synthetic sweeteners.</p> <p>b) Emulsifiers/stabilizers mentioned in Table 1 may also be permitted for Fruit bars.</p>
			<p>c) Natural and synthetic food colours mentioned in Table 1 may also be extended for Fruit bars as other food products in 04.1.2.8 are already permitted to contain these additives.</p>
			<p>d) Preservatives like benzoates and sorbates mentioned in Table 1 may also be extended for Fruit bars as other food products in 04.1.2.8 are already permitted to contain these additives.</p>
5.	04.1.2.3	Pickled fruits (Lime – gooseberries) and pickled vegetables (ginger, garlic, chilli)	<p>a) Preservatives like benzoates and sorbates mentioned in Table 1 may also be extended for Pickles as other food products in 04.1.2.3 are already permitted to contain these additives.</p> <p>b) Antioxidants mentioned in Table 1 required for Pickles in oil, at 0.02% on fat basis</p>
6.	12.2	Chilli paste	<p>a) Preservatives like benzoates and sorbates mentioned in Table 1 may also be extended for Chilli paste as other food products in 12.2 are already permitted to contain these additives.</p> <p>b) Antioxidants mentioned in Table 1 required for Chilli paste at 0.02% on fat basis.</p>
7.	12.9	Paneer	<p>a) Preservatives mentioned in Table 1 like Nisin for 12.9 (for protein foods) at 200 mg/kg may be extended for Paneer.</p>

8.	15.1	Bhujiya (Namkeen)	a) Synthetic colours mentioned in Table 1 may also be permitted for Bhujiya as other food products in 15.1 are already permitted to contain synthetic colours .
			b) Antioxidants mentioned in Table 1 required for Bhujiya at 0.02% level on fat basis.
			c) Emulsifiers/stabilizers mentioned in Table 1 may also be extended for Bhujiya as other food products in 15.1 are already permitted to contain these additives.

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Agenda Item 10 (a)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

INDIA

Agenda Item 10 (a) – Draft Revised Codex General Standard for Irradiated Foods (CX/FAC 03/12):

2.1 (a) Cesium – 137 is doubly encapsulated in stainless steel pellets and further configured as pencils or cylindrical shape. Such sources are safe. Gamma rays from cesium source have half the energy (0.66 MeV) that of cobalt-60 (1.33 MeV). Therefore, they could be useful in making portable types of irradiators. Therefore, this source (137Cs) should be retained.

2.2 India proposes deletion of shaded lines. However, commodity-wise list proposing the minimum, maximum, overall average numerical dose of irradiation (KGY) may be developed for the guidance of the member countries, as the absorbed dose level will depend on the properties / composition of food commodities/products to be irradiated.

2.3.5 Food irradiation facilities are in public domain, and could be open to inspection on bilateral basis between trading partners. The word “facilities” could be retained.

4.1 The shaded lines under General Requirement should read as follows:

The irradiation of food should not be used as substitute for good hygienic and good manufacturing practices.

5.3 If CCFAC recommend the removal of upper dose limit, then this entire clause becomes redundant and should be deleted.

6.3.1 The shaded lines may be retained. However, the bulk containers need to be defined

6.4 This whole Para may be read as follows:

When required and where applicable, analytical methods for the detection of irradiated foods may be used to enforce authorization and labelling requirements. **The analytical methods used should be validated, accredited and accepted internationally.**

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Agenda Item 14 (c)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

INDIA

Agenda Item 14 (c) – Proposed Draft Principles for Exposure Assessment of Contaminants and Toxins in Foods (CX/FAC 03/19):

1. Para 7: It says that median/mean contaminant levels in foods should be used to generate dietary exposure estimates for regions in the world.

It would be appropriate if the data used for determining the mean/median were accessible to the member countries on request, to maintain the transparency. Therefore, it is proposed to amend para 7 as follows:

“Median/mean ----- submitted by countries and from other sources and accessible to the member countries upon request. These data are combined with ----- approach or exceed the tolerable intake.”

2. Para 8: It mentions that JECFA may use available national contaminant and/or individual food consumption data in some cases to provide more accurate estimates of total dietary exposure, particularly for vulnerable groups such as children.

Use of ‘*individual food consumption data*’ for vulnerable groups such as children and applying the standards so elaborated for general population is not acceptable. Such standards would always be more stringent than required for the general population and actions to meet them would add to the cost of such food products. It would unnecessarily tax the general population by forcing it to use costlier food products that are actually meant only for specific consumer groups. Providing estimates of total dietary exposure based on national contaminant and/or individual food consumption data may be justified for fixing of standards for foods meant only for special dietary uses. To bring out this aspect clearly into the text, it is proposed to amend para 8 as follows:

“In some cases of foods meant only for special dietary uses, available national contaminant and/or individual food consumption data may be used by JECFA to provide more accurate estimates of total dietary exposure, particularly for vulnerable groups such as children.”

3. Para 11, third criteria reads “Foods or food groups that may have a significant impact on exposure for specific groups of consumers, although exposure may not exceed 5% of the tolerable intake (or similar health hazard endpoint) in any of the GEMS/Food Regional diets. These would be considered on a case-by-case basis.”

The criterion is not clear and it has certain flaws as described below:

a) First part of the first sentence ‘Foods or food groups that may have a significant impact on exposure for specific groups of consumers’ contradicts its second part ‘although exposure may not exceed 5% of the tolerable intake’. If a food has ‘significant impact on exposure’, then it is bound to have a larger value (than 5%) of exposure for the concerned contaminant through diet for the concerned specific group of consumers.

b) If read as presently written, the criterion would apply to all foods as all major foods consumed by the general population are also consumed by specific groups of consumers like children. As there would not be any applicable minimum exposure level required through the diet, any of the foods or food groups could be considered by CCFAC for elaboration of standards. This makes application of the other two criteria given under para 11 redundant.

c) The standards fixed for foods applying this criterion would be appropriate for specific group of consumers. However, the criterion does not mention that such standards would be applicable only to the foods meant only for specific group of consumers and not to the general population.

Probably, the criterion is intended to be applied for only those foods that are meant only for specific groups of consumers like children, immuno-compromised people, old people etc. but the same is not correctly reflected by the text used. The text should be modified as follows:

“Foods or food groups that ~~may have a significant impact on exposure~~ are meant only for specific groups of consumers, although exposure may not exceed 5% of the tolerable intake (or similar health hazard endpoint) in any of the GEMS/Food Regional diets. These would be considered on a case-by-case basis.”

4. Para 12 subpara 2 says that CCFAC should take into account the distribution curves made by JECFA while proposing the lowest achievable levels for contaminants/toxins in food on a global basis.

Since JECFA is the risk assessing body, it would be appropriate if all the work involving/based on risk analysis were carried out by JECFA. Accordingly, JECFA should be responsible for elaboration of MLs, where it is found necessary after risk assessment. The CCFAC, as risk managers, should provide their decision whether an ML is required to be fixed or a guideline is to be elaborated. Thereafter, if it is

decided to fix an ML on the basis of risk assessment, the work should be delegated to the JECFA. This ensures rationality and science based outcomes. **Therefore, it is proposed to modify subpara 2 under para 12 as follows:**

“CCFAC will take this information into account when considering risk management options and for deciding whether an ML should be fixed or a guideline/ code of practice should be elaborated ~~proposing the lowest achievable levels for contaminants/toxins in food on a global basis.~~If requested by CCFAC to fix an ML, JECFA will take this information into account when proposing the ML for contaminants/toxins in food”.

5. Para 15 subpara 2 describes how the CCFAC and JECFA should work for refining the risk management decisions.

For the reasons given above (for para 12), subpara 2 of para 15 should be amended as follows to clearly reflect the division of responsibilities of the risk assessment and risk management between the JECFA and CCFAC respectively:

“Taking this information into account, CCFAC proposes risk management decisions. If it is decided to fix an ML, the CCFAC requests JECFA to perform a risk assessment and propose an ML. If it is decided to elaborate a guideline/ code of practice, the CCFAC requests the drafting group to do the job. To refine them, ----- developed by JECFA.”

Accordingly, figure in the Annex II should be corrected.

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Agenda Item 15(b)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

INDIA

Agenda Item 15 (b) – Comments Submitted on the Draft Maximum Level for Patulin in Apple Juice and Apple Juice Ingredients in Other Beverages Submitted in Response to CL 2002/10-FAC (CX/FAC 03/21):

India support the decision taken by CCFAC in its 34th Session on fixing of maximum levels for Patulin in apple juice and apple juice ingredients in other beverages at 50 ug per Kg. There is a need to collect more data on the level of Patulin from developing countries or a study may be conducted by FAO/WHO for collecting data from developing countries. As agreed by CCFAC, the possible reduction of maximum level of 50 ug per kg to 25 ug per kg may be considered after four years once the code of practice for reduction of patulin in apple juice had been implemented.

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Agenda Item 16 (a)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

INDIA

Agenda Item 16 (a) – Comments Submitted on the Draft Maximum Levels for Lead in Fish in Response to CL 2002/10-FAC (CX/FAC 03/26):

COMMENTS:

India propose that upper limit of lead to be fixed at 1.5 ppm for Fish .

BACKGROUND

The proposed maximum level (0.2 ppm) for lead in fish is too low and the proposal may be reviewed for the following reasons:

1. At the proposed 0.2ppm limit of lead in fish, the lead intake by maximum consumption of 100g of fish per day would be 20 mg/day for a body weight of 60Kg. This amounts to 0.33 mg/ day per kg b.w. and 2.31mg/kg bw. per week . This is 9 times lower than the PTWI (i.e. 20mg). If the lead level is fixed at 1.5ppm the intake through 100g of fish would be approximately 17.325 ug which is also below the PTWI fixed by codex i.e.20 ug. Therefore the limit of 1.5 ppm in fish for lead may be fixed.
2. The currently available data show that the lead content vary from species to species in fish and from varying environmental contamination especially water used for fish processing.
3. The contaminants like lead are due to natural processes and their levels in commodities like fish cannot be influenced. Therefore, assigning limits for contaminants below the natural levels will impede the growth of the industry.

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Agenda Item 16 (b)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

Agenda Item 16 (b) – Comments Submitted on the Maximum Levels for Lead in Milk and Milk Fat in Response to CL 2002/10-FAC (CX/FAC 03/27):

The levels of lead in milk and milk fat were proposed by 32nd CCFAC (ALINORM 01/12, Appendix XI) in March 2000 and adopted by 24th CAC (ALINORM 01/41, para 121) in July 2001. In the 24th CAC, the delegation of India had expressed its reservation at the fixing of these levels on the grounds that: (i) there was no JECFA evaluation; and (ii) there was no IDF standard which was claimed to be the basis on which the level had been recommended (ALINORM 01/41, para 122). At 34th CCFAC in March 2002, the delegation of India had expressed the opinion that since the maximum level for lead in milk had a footnote that a concentration factor applies, there was no need for a separate maximum level for lead in milk fat, as it may very often lead to two different values in milk-fat products (ALINORM 03/12, para 136). (copy of comments enclosed - Annexure-I).

a) For ML of lead in milk fat, **India maintains that since the maximum level for lead in milk has a footnote that a concentration factor applies, there is no need for a separate maximum level for lead in milk fat, as it may very often lead to two different values in milk-fat products. Therefore, the ML for lead in milk-fat should be revoked.**

b) For ML of lead in milk, in view of the fact that there is no JECFA evaluation for lead in milk, **it is proposed that the CCFAC should request JECFA to carry out evaluation to decide the need of fixing an ML for lead in milk. If it is required to fix an ML, JECFA should**

propose the ML on the basis of risk assessment. Till such evaluation is carried out by the JECFA and the results made available, the implementation of adopted level for lead in milk may be kept in abeyance.

ANNEXURE-I

India's proposal for revoking the ML for lead in Milk-fat

The Codex Alimentarius Commission in its 24th session held at Geneva during 2-7 July 2001 adopted maximum level for lead in milk of 0.02 ppm with a footnote that 'for dairy products, an appropriate concentration factor should apply' (ALNORM 01/12 Appendix XI, enclosed). The Commission also adopted ML for lead of 0.1 ppm in milk-fat.

In accordance with the decisions of the Commission, two different MLs for lead would be obtained for milk-fat products such as double cream, dairy spreads and butter-oil: one employing the ML for milk applying the concentration factor, and the other employing the ML in milk-fat.

For an instance, in the case of dairy spread (65% fat),

If concentration factor is applied : ML would be 0.288 ppm
(with concentration factor of 14.4)

If ML for milk-fat is applied : ML would be 0.065 ppm

Thus, two different MLs for lead in milk-fat products obtained by employing the presently approved document would present difficulties in implementation of Codex approved MLs.

Therefore, to ensure that the ML for lead in all dairy products, including milk-fat products, are consistent with Codex decision, it is proposed that the maximum level of 0.1 ppm lead in milk-fat be revoked.

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Agenda Item 16 (f)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

Agenda Item 16 (f) – Comments Submitted on the Proposed Draft Maximum Levels for Cadmium in Response to CL 2002/10-FAC (CX/FAC 03/31):

Comments

The CCFAC in its 34th Session agreed to request JECFA to

- i. To give distribution curve for the cadmium contamination levels for the food groups mentioned in the document
- ii. To perform an exposure and risk assessment for cadmium resulting from consumption of food in the above mentioned food groups taking into account three different levels i.e., the draft maximum level at step-3, one level lower and one level higher than the proposed draft maximum levels.

India proposes to postpone the decision on the fixing of maximum levels for cadmium till the information asked by CCFAC in its 34th Session is submitted by JECFA.

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Agenda Item 16 (g)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

INDIA

Agenda Item 16(g) – Position Paper on Dioxins and Dioxin Like PCBs, Including Information Submitted on Actual Levels and Methods of Analysis for Dioxin and Dioxin-Like PCBs in Response to CL 2002/10-FAC (CX/FAC 03/32):

COMMENTS:

The decision to set the maximum limits must be taken only after the scientific data is available.

BACKGROUND

Dioxins and dioxin like PCBs are persistent environmental contaminants. The major sources of dioxins entering the food supply include environmental reservoirs and waste incineration. Fish and fish products, meat and meat products, and milk and dairy products contribute to the dietary intake of dioxins. WHO has assigned 1-4 Pg. TEQ/kg b.w. for dioxins and Scientific Committee on Foods (SCF), taking into consideration, the long half-life in human body, has assigned a t-TWI of 7 Pg/kg b.w. Validated bio assay methods which are specific and targeted are required for detection of Dioxins at pico gram level. In view of this no upper limit at this point of time to be fixed. **The decision to be postponed to 2005 till all the methods to be validated and inputs from all the countries received.**

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Agenda Item 16 (j)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, Tanzania, 17 to 21st March, 2003

Government Comments

Agenda Item 16 (j) – Discussion Paper on Deoxynivalenol, Including Information and Data Submitted on the Occurrence of Deoxynivalenol in Cereals in Response to CL 2002/10-FAC (CX/FAC 03/35):

- Deoxynivalenol (DON) is not carcinogenic to animals/ man. International Agency for Research on Cancer (IARC) has classified it in Group 3.
- General toxicity and immunotoxicity are considered to be the critical effects. It inhibits DNA/ RNA and protein synthesis at the ribosomal level. It has a hemolytic effects on erythrocytes. Acute doses can induce vomiting in pigs.
- The NOAELS reported for DON vary between 0.04 to 0.375 mg/kg bw per day. But in much of these studies from which these NOAELS were derived the presence of other trichothecenes in the naturally contaminated feed were not taken into account. It was therefore decided to use the NOAEL (0.1 mg/kg bw per day) of only one chronic dietary study with mice and the application of an uncertainty factor of 100. A TDI of 1 µg/kg bw per day was thus derived.

The following points need consideration:

- i) A study conducted in India in 1989, reported human food poisoning caused by infected wheat. A NOAEL of 0.44 µg/kg b.w. was estimated using an average intake of 67 g wheat products and a mean b.w of 52 kg. However, it was found that the exposure was not limited to DON but included other toxins also which led to uncertainties in the estimated NOAEL. This data was also not considered for deriving the TDI by the CCFAC.

The TDI of 1 µg/kg b.w. per day which was accepted by Codex was derived from the data of only one chronic dietary study with mice. Therefore, this

determination of TDI is not justified. Further study needs to be conducted before fixing maximum levels of DON in cereals. Moreover, the possible reduction in DON during processing was also not taken into consideration by CCFAC. It is also not justified to fix the limit for DON alone as other trichothecenes like HT-2 toxin, T-2 toxin, Nivalenol also occur together in contaminated cereals. Some of the trichothecenes also have synergistic and antagonistic effects. These effects have to be studied completely before fixing limits.

ii) The proposed maximum levels for DON by CCFAC:

Raw cereal grain to be subjected for sorting or other physical treatments before human consumption – 2000 µg/kg

Cereals and derived products for direct human consumption – 500 µg/kg

Cereal-based infant foods – 100 µg/kg

iii) At present as per Indian food legislation, the max. limits for DON in wheat is fixed at 1000 µg/kg .

However, India propose that limits of 1000 µg/kg of DON may be laid down for raw cereal grains by CCFAC. With regards to cereals and derived products for direct human consumption and cereal based infants foods , India would like to mention that ML in these products will depend on the composition of the products and amount of cereal used . Therefore , before arriving at ay final decision, there is a need for collection of more global data so that ML can be fixed on scientific basis.
