

REPORT OF THE  
INDIAN DELEGATION TO THE  
37<sup>TH</sup> SESSION OF THE  
CODEX COMMITTEE ON FOOD HYGIENE  
BUENOS AIRES, ARGENTINA  
MARCH 14 - 19, 2005

ATTENDED BY

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2. Shri S.K. Srivastava, Director (Trade), Department of Animal Husbandry & Dairying, Ministry of Agriculture, New Delhi.
3. Shri S. Dave, Director, Agricultural and Processed Food Products Export Development Authority, New Delhi.
4. Shri Sunil Bakshi, Senior Manager (QPM), National Dairy Development Board, Anand.

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## 1. EXECUTIVE SUMMARY

- I. The 37<sup>th</sup> Session of the Codex Committee on Food Hygiene (CCFH) was held in Buenos Aires, Argentina during 14 – 19 March 2005. The Session, jointly hosted by USA and Argentina, was attended by 179 delegates from 58 member countries and 38 participants from several international organizations/NGOs and others. The Indian Delegation comprised four members.
- II. During the Session, the Committee considered five Draft Codes at Step 4 and six Discussion Papers, among other items. The Committee advanced three draft Codes (The Proposed Draft Principles and Guidelines for the Conduct of Microbiological Risk Management, Proposed Draft Revision of Code of Hygienic Practice for Eggs and Egg Products and Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods) to Step 5 and returned the Proposed Draft Revision of the Recommended International Code of Practice for Food for Infants and Children and draft Guidelines for the Validation of Food Control Measures to Step 2 for revision. One discussion paper pertaining to the management of the work of the Committee was forwarded to CCGP for advice. The committee agreed to place the five discussion papers to the Committee's work management system and identified Sweden, United States, New Zealand and The Netherlands to prepare written proposals in respect of subjects proposed by them.
- III. An important Agenda Item was Discussion Paper on the Management of the Work of the Committee (Agenda Item 3). The Committee agreed to forward the amended "Proposed Process by which the CCFH will undertake its work" to CCGP for advice on its consistency with established procedures in Codex. The Committee also decided to immediately begin to use this process on an interim basis for the management of its work.
- IV. The "Proposed Draft Revision of the Recommended International Code of Practice for Food for Infants and Children" (Agenda Item 4) was discussed at Step 4 and was returned to Step 2 for further revision by the Drafting Group.
- V. The "Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods" (Agenda Item 5) was discussed at Step 4, and was advanced to Step 5 for adoption by the Commission.
- VI. The proposal Draft Guidelines for the validation of Food Hygiene Control Measures (Agenda Item 7) could not be taken up for discussion due to paucity of time.

- VII. The Agenda Item 8, "Proposed Draft Revision of Code of Hygienic Practice for Eggs and Egg Products", having high importance for India was discussed at Step 4. The Committee agreed to advance it to Step 5 for adoption by the Commission at its next meeting in June 2005. With India's consistent efforts in this Committee and earlier working groups, the draft code provides the required flexibilities for the small holder backyard poultry farming. Environmental hygiene, a major concern for the small poultry farmers, has now been well addressed in the code.
- VIII. Under Agenda Nos. 10, 11, 12 and 13 there were five discussions papers on the Risk Based Control of *Salmonella spp.* in Poultry and Enterohemorrhagic *E. coli* in Ground Beef and Sausages, Risk Management Options for *Campylobacter* in Broiler Chicken, Risk Profile for *Vibrio spp.* in Seafood and Viruses in Foods. The committee agreed to place these work areas to Committee's work management system and identified Sweden, United States, New Zealand, United States and The Netherlands, respectively, to prepare written proposals in respect of subjects proposed by them.
- IX. The next meeting of the CCFH is scheduled for 14-19 November 2006 in Washington D.C., USA.

## 2. INTRODUCTION

- 2.1. The 37<sup>th</sup> Session of the Codex Committee on Food Hygiene (CCFH) was held in Buenos Aires, Argentina during 14 March - 19 March 2005. The Session was chaired by Dr. Karen Hulebak, Deputy Administrator, Office of Public Health and Science, USDA with Ms. Andrea N. Calzetta Resio of Argentina functioning as Co-Chair.

The Indian delegation comprised of the following:

1. Shri Tapes P. Pawar, Joint Secretary (A&IC), Department of Animal Husbandry & Dairying, Ministry of Agriculture, New Delhi.
  2. Shri S.K. Srivastava, Director (Trade), Department of Animal Husbandry & Dairying, Ministry of Agriculture, New Delhi.
  3. Shri S. Dave, Director, APEDA, New Delhi.
  4. Shri Sunil Bakshi, Senior Manager (QPM), NDDDB, Anand.
- 2.2 Before and during the Sessions, the Indian Delegation interacted especially with the delegates of other Asian countries (Indonesia, Japan, China, Thailand, Korea and Malaysia) and some Latin American Countries (Argentina and Brazil) and it was agreed to support each other on points of common interest.

India was successful in getting its viewpoints on important matters accepted by the Committee. It is noteworthy that reference to precautionary principle and traceability were strongly opposed by India and there was enough support from Argentina and Brazil on this issue. Hence, such proposals, wherever mentioned, were placed in square brackets. On a general basis, it was agreed that reference to traceability would remain square brackets until a document on its application was elaborated by the CCFICS.

- 2.3. During the Session, the Committee considered 12 work items, among other businesses that included five Draft Codes at Step 4 and six Discussion Papers. The Committee advanced three draft codes (The Proposed Draft Principles and Guidelines for the Conduct of Microbiological Risk Management, Proposed Draft Revision of Code of Hygienic Practice for Eggs and Egg Products and Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods) to Step 5 and returned two Codes to Step 2 for revision. One Discussion Paper pertaining to the management of the work of the Committee was forwarded to CCGP for advice. The committee agreed to place five other Discussion Papers to the Committee's work management system and identified Sweden, United States, New Zealand and The Netherlands to prepare written proposals in respect of subjects proposed by them.

2.4. In short, the decisions of the Committee are given in following table :

Agenda Item	Particulars	Decision Taken
3.	Discussion Paper on the Management of the Committee	Referred to CCGP for advice on consistency with the established procedures in Codex. Decided to immediately begin to use this process on an interim basis for the management of its work.
4.	Proposed Draft Revision of the Recommended International Code of Practice for Food for Infants and Children (at step 4)	Returned to Step 2
5.	Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of <i>Listeria monocytogenes</i> in Foods (at step 4)	Advanced to Step 5
6.	Proposed Draft Principles and Guidelines for the Conduct of Microbiological Risk Management (at step 4)	Advanced to Step 5
7.	Proposed Draft Guidelines for the Validation of Food Hygiene Control Measures (at step 4)	Could not be discussed. Returned to step 2
8.	Proposed Draft Revision of the Code of Hygienic Practice for Egg Products (at step 4)	Advanced to Step 5
9.	Reports of the Ad Hoc Expert Consultations on Risk Assessment of Microbiological Hazards in Foods and Related Matters	It was only for discussion
10.	Discussion Paper on the Guidelines for the Application of the General Principles of Food Hygiene to the Risk Based Control of <i>Salmonella</i> spp. in Broiler Chicken.	The committee agreed to place these work areas (Discussion Papers) to Committee's work management system and identified Sweden, United States, New Zealand, United States and The Netherlands, respectively, to prepare written proposals in respect of subjects proposed by them.
11.	Discussion Paper on the Guidelines for the Application of the General Principles of Food Hygiene to the Risk Based Control of Enterohemorrhagic <i>Escherichia Coli</i> in Ground Beef and Fermented Sausages	
12.	Discussion Paper on the Guidelines for the Risk Management Options For <i>Campylobacter</i> in Broiler Chicken.	
13. a.	Risk Profile of <i>Vibrio</i> spp. in Seafood	
b.	Discussion Paper on Viruses in Food	
13. c.	Draft Terms of Reference for the FAO/WHO Expert Consultation on the Use of Active Chlorine.	The Committee formulated and agreed to attach the terms of reference for the FAO/WHO Expert Consultations on the use of active chlorine.

### 3. IMPORTANT PROCEEDINGS OF THE MEETING

#### 3.1 Discussion Paper on the Management of the Work of the Committee (Agenda Item 3)

The Drafting Group led by USA met immediately prior to the beginning of the current CCFH Session and further revised the consolidated document which was earlier prepared by merging three different documents (process for undertaking work, criteria to establish priorities, and cross-committee interaction process) as per the decision of the 36th Session of the CCFH (March-April 2004). The revised document was presented as CRD 54 for discussion during the Session. The document outlined a detailed process for management of the Committee's work, including setting up of an *ad-hoc* Working Group at each Session of the Committee for carrying out the designated work till the next session of the Committee. The *ad-hoc* Working Group would be responsible for evaluating all new work proposals/prioritizing Committee's work and making recommendations to the Committee appropriately for its consideration at the following Session. The proposed document is slated for adoption by the Codex Alimentarius Commission without going through the routine 8-Step procedure.

In the revised document the reference to FAO/WHO providing scientific advice to the Committee was deleted at many places. Additionally, the document also included a reference related to the CCFH seeking such scientific advice from scientific bodies other than FAO/WHO, e.g International Commission on Microbiological Specifications for Foods (ICMSF). India strongly objected to the above changes in light of the fact that FAO/WHO have a transparent process of making available scientific advice to Codex. Following our intervention, the reference to FAO/WHO was restored at all the places in the document. However, the Committee did not agree to our proposal to delete the text, appearing at one place in the document, pertaining to the CCFH seeking such advice from scientific bodies other than FAO/WHO also. Our reservation on the issue has been recorded in the Report.

The Committee amended and forwarded the document to Codex Committee on General Principles (CCGP) for its advice on the consistency of the document with established procedures in Codex.

The Committee also decided to begin use of the process on an interim basis for the management of its work. It also decided to convene an *ad-hoc* Working Group, chaired by Australia, before its next Session to develop recommendations for consideration by the CCFH on the acceptance, revision and/ or rejection of the new work proposals at the 38<sup>th</sup> Session.

3.2 Proposed Draft Revision of the Recommended International Code of Practice for Food for Infants and Children (Agenda Item 4).

The Committee discussed the Draft Revised Code, prepared by a Working Group led by Canada, at Step 4.

On the basis of the recommendation by the Drafting Group the Committee agreed to rename the document as '*Code of Practice for Powdered Formula for Infants and Young Children*'. With reference to the scope of the Code, delegations expressed two divergent views- a) either to focus on a few products only, e.g. powdered infant formulae, and the risks arising from *Enterobacter sakazakii* and *Salmonella* contamination, or b) to focus on powdered formula for infant and young children and the risks arising out of *Enterobacter sakazakii*, *Salmonella* and other microbial contamination. On the basis of the discussions, the Committee agreed to broaden the scope of the Code and restructure the same to address all types of powdered formula for infants, including infants at greatest risk, and young children in the light of the fact that *Enterobacter sakazakii* and *Salmonella* were causing diseases in all age groups.

Additional advice from FAO / WHO on *Enterobacter sakazakii* and other microorganisms in powdered infant formula was also sought to address some specific issues.

The Committee agreed to return the Code to Step 2 for revision by Working Group taking into account the decisions regarding the scope and structure of the Code.

3.3 Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods (Agenda Item 5).

This document was discussed by the Committee at step 4. After detailed discussions the Committee agreed to forward the Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Ready to eat Foods, including Annex I for adoption by the Commission in its next Session. The Annex II attached to this document was returned at step 2 for revision by the Working Group led by Germany.

3.4 Proposed Draft Principles and Guidelines for the Conduct of Microbiological Risk Management (Agenda 6).

The document was revised in a meeting of the Drafting Group immediately prior to the beginning of the current session of the CCFH. The revised document was presented as CRD 36 and discussed at Step 4 by the Committee. Overall, the major concerns of India, expressed during the 36<sup>th</sup> Session of the Committee (March-April

2004) as well as in the subsequent meeting of the Drafting Group (September-October 2004), were addressed appropriately in the revised document. However, some additional submissions made by India are as follows:

India made the following major interventions:

#### Para 4. General Considerations

During the drafting group meeting held in September 2004 at Brussels, India had raised apprehensions about inclusion of certain words in the document as these have much broader implications. In line with our views, India proposed that the second para be modified. This proposal was not agreed to by the Committee. However the words, "to the extent feasible" were added to provide flexibility in the case of domestic and imported products in considering means for controlling the public health risks associated with them. Further, the Committee was reminded of the decisions taken by the Drafting Group meeting held in September 2004 with regard to ALOP and that there should not be any further changes in the formulation as it was in line with the SPS agreement. On the insistence of India, the new formulation was reversed to the earlier one as follows:

*"MRM should address the food chains as individual continuums, taking into account relevant ~~ecological~~ and ~~environmental~~ conditions, primary production (~~including feed~~), product design and processing, transport, storage, distribution and handling practices used throughout the food chain, ~~including imported products.~~"*

#### Para 5.1 Identification of a Microbiological Food Safety Issue

In the third para there was a reference to 'barriers to trade, etc.'. This phrase cannot provide information that might be required to identify a food safety issue. It was, therefore, proposed to delete the text reading 'barriers to trade, etc.'. This was agreed to.

In the last para, India proposed to delete a paragraph referring to application of provisional decisions when scientific knowledge is insufficient, this being a precautionary approach. The Committee, however, agreed to retain the entire text in square brackets.

In the text pertaining to identification and selection of MRM options by the Codex, the Committee agreed to our suggestion to align the wording in the existing text on precautionary approach with the one decided in the 24<sup>th</sup> Session of the CAC (ALINORM 01/41).

#### Para 5.4 Microbiological Risk Assessment

India also proposed to delete the provision of deciding on provisional Microbiological Risk Management (MRM) options in the event of some elements of MRA requiring further study. Our position was supported by Argentina also. The Committee, however, agreed to keep the phrase 'decision on provisional MRM options' in square brackets.

#### Para 6.1.2 Countries

India, supported by Argentina, proposed to keep the phrase 'traceability/traceability systems', wherever appearing in the document, in square brackets as no principles or guidelines for such system have been elaborated by the Codex so far. Some delegations were not in favour of doing so. However, on the basis of some further clarifications from the Codex Secretariat, the Committee agreed to our proposal.

#### Para 6.2.2 Risk-based MRM options

In the second line of the sixth paragraph, there is a phrase reading, "reasonable certainty of no harm". In the drafting group meeting held in September, 2004, it was agreed that the word, 'certainty' would read as 'assurance'. However, this suggestion was not agreed to during the CCFH meeting.

#### Para 7 IMPLEMENTATION OF MRM OPTIONS

##### Para 7.3 Industry

In line with our suggestion under para 6.1.2 above, India again proposed that the words, 'traceability/product tracing' be placed in square brackets. This was agreed to.

#### ANNEX I: Overall framework for managing food borne risks

The Committee accepted our viewpoint that immediate and / or provisional MRM decisions should be applicable only in situations of immediate public health concern. Accordingly, in the diagram on overall framework for managing food borne risks the phrase 'immediate and /or provisional MRM decision' was delinked as a possible follow up of a risk profile, except in situations of immediate public health concern.

After discussion and necessary amendments, the Committee decided to advance the document, except Annex III, to Step 5 for preliminary adoption by CAC. The Annex III pertaining to examples of the use of

new food safety system concepts, like Food Safety Objective (FSO) / Performance Objective (PO) / Performance Criterion (PC)/ Microbiological Criteria / Process and Product Criteria, would be further developed at Step 2 by a Working Group led by United States.

### 3.5 Proposed Draft Guidelines for the Validation of Food Hygiene Control Measures (Agenda Item 7)

The Committee could not discuss the document due to time constraints and decided to return it to Step 2 for redrafting by a Working Group led by United States.

### 3.6 Proposed Draft Revision of the Code of Hygienic Practice for Eggs and Egg Products (Agenda Item 8)

This document was discussed by the Committee at step 4. After detailed discussions the Committee agreed to forward the "Proposed Draft Revision of the Code of Hygienic Practice for Egg Products" for adoption at step 5 by the Commission at its next Session.

India made the following major interventions:

#### Para 2 SCOPE AND USE OF THE DOCUMENT

##### Para 2.1 Scope

In the first paragraph the last sentence reads '*The code is relevant to all egg producers and processors, regardless of size or production method.*' This sentence was deleted at the instance of India. Similarly, the second paragraph reading, '*This code applies to products in international trade. It may also serve as a basis for national legislation.*' was deleted as these did not fall within the scope of this document. It was argued that this code need not necessarily form the basis for national legislation as the governments may choose to decide whether to introduce legislation or guidelines for producers and processors.

##### Para 2.3 Principles Applying to the Production, Handling and Processing of all Eggs and Egg Products

It was suggested that in the first principle, the word, 'shown' in the second line should be replaced by the word, 'intended' to make it simpler and appropriate.

In the second principle, the words, 'and practicable' were inserted before the words, 'hygienic practices' so as to make this principle consistent with the explanatory narrative in the second paragraph.

### Para 3 Primary Production

The title of the second principle was considerably modified as the latter portion was only a matter of procedure and not a principle and because India argued that environmental sources need not be brought into the principle as some flexibility was required for developing countries. Accordingly, this principle was modified as follows :

*"Contamination of eggs ~~from personnel and animal and environmental sources~~ during primary production should be minimized through good flock management and egg production practices"*

#### Para 3.1 Environmental Hygiene

India again explained that enough flexibility was required in case of developing countries where poultry farming is done on an open house system (availability of enough ventilation and sunshine) and free range foraging (intensive and controlled housing environment) is not economical. Moreover, there are thousands of small farmers operating at different locations and it is not possible to evaluate the land or environment in the surrounding agricultural fields. Therefore, making identification of parameters such as previous use of land, presence of contaminants, polluted surface water, potential microbial and chemical hazards from contamination by faeces and other organic waste may not be completely possible in developing countries.

The subsequent paras and bullet points further emphasise on identification of potential sources of contamination from egg laying establishment, environment and previous uses. The requirements indicated in these paras and bullet points are not possible to monitor in developing countries because of the presence of very small poultry farmers. In many cases, the farmers also do mixed farming, whereby, they keep the cattle on the ground floor and poultry birds on the floor above. Acceptance of requirements suggested in the draft code would mean that the small farmers would have to close down their business. It is only in the developing countries where there are very few farmers doing poultry farming on a large scale with automatic feeding, watering, collection and packaging systems.

India further pointed out that there is already a lot of controversy over free range foraging as this system leads to recurrence of many bacterial and parasitical diseases because of the fact that birds have a direct contact with the floor. Moreover, this system leads to low productivity of flocks compared to caged birds, and as per calculations, the cost increases by two times because the birds need more space and different nutritional requirements. Therefore, free-range foraging system will not be technically and economically viable in developing countries.

India was, therefore, of the view that the above concerns should be taken into consideration while drafting the subsequent paragraphs. Accordingly flexibility was provided to the texts by changing the word, "should" to "could" at the relevant places.

#### Para 3.2.1 Flock Management and Animal Health

In the second indent of the sixth bullet, India suggested that reference to Codex standards on MRLs should be incorporated with respect to use of veterinary drugs, which was agreed to.

#### Para 3.5 Documentation and Record Keeping

At the intervention of India, the reference to Traceability was placed under square brackets.

The committee also agreed that the document on "Consideration in Establishing Effective Microbiological Treatments, including pasteurization, for table eggs and egg products" would be developed as an Annex to the Code. USA would be the leader of the Drafting Group.

#### 3.7 Discussion Paper on the Guidelines for the Application of the General Principles of Food Hygiene to the Risk Based Control of *Salmonella spp.* in Poultry (Agenda Item 10)

Discussion Paper on the Guidelines for the Application of the General Principles of Food Hygiene to the Risk Based Control of Enterohemorrhagic *E. coli* in Ground Beef and Sausages (Agenda Item 11)

Discussion Paper on the Guidelines for Risk Management Options for *Campylobacter* in Brioler Chicken (Agenda Item 12)

Risk Profile of *Vibrio spp.* in Sea Food (Agenda Item 13a)

Discussion Paper on the Viruses in Food (Agenda Item 13b)

Due to time constraints, there was a quick discussion on the above and all these documents were combined for discussion. The following countries were identified to prepare written proposals on each of these:

- (a) Sweden : Guidelines for the Application of the General Principles of Food Hygiene to the Risk Based Control of *Salmonella spp.* in Poultry.
- (b) USA : Guidelines for the Application of the General Principles of Food Hygiene to the Risk-Based Control of Enterohemorrhagic *E. coli* in Ground Beef & Sausages.

- (c) New Zealand : Guidelines for Risk Management Options for *Campylobacter* in Broiler Chicken.
- (d) USA : *Vibrio spp.* in Seafood.
- (e) The Netherlands: Viruses in Food.

### 3.8 Draft Terms of Reference for the FAO/WHO Expert Consultation on the Uses of Active Chlorine (Agenda Item 13c)

There was no major intervention on the part of India on this document. The Committee formulated and agreed to attach the terms of reference for the FAO/WHO expert consultation.

## 4. Observations and Action Points

1. India has often been seen as an emerging leader of the developing countries in Codex discussions. This time, Argentina and Brazil supported India on many points and *vice versa*. We had some good discussion on different agenda items. On the contrary, the Asian countries seemed to be scattered and there was hardly any exchange of notes. India tried with Korea to convene a meeting of the Asian countries. They even discussed with other members but there was only a luke warm response. Hence, no meeting of the Asia group was held. Japan appeared to be taking the side of the developed countries on many occasions. India and Indonesia did support each other on a few points.
2. In light of the fore going and since it was also observed that Latin American Countries were more cohesive (alike EU countries), in consultation with the leader of the Indian delegation, we have informally extended an invitation to Argentina (who is also the Chair of CCLAC) to bring a delegation of 2 – 3 persons from South America to India who could be given a flavour of the efforts being made by the developing countries like India and the problems that are being faced. The idea is to lobby with them as there is a need for more cooperation with them in Codex meetings.
3. As a result of India's interventions, our main concerns were largely and suitably addressed in most of the Agenda Items. While it is important to ensure that these are retained and not diluted in their subsequent stages, our reservation on the issue of CCFH seeking scientific advice from bodies other than FAO/WHO also needs to be taken up during the CCGP meeting when the document (Agenda Item 3), referred by CCFH for advice, is taken up there.

4. Agenda documents circulated to member countries for their comments are now frequently revised/amended by drafting groups immediately before the Committee sessions. The member country delegations then find it difficult to go through the revised documents during the Committee's plenary sessions and react to the changes. It is, therefore, important that documents that have been circulated to member countries for comments should be revised/amended only after discussions in the plenary. The issue needs to be appropriately raised in the next session of the CCFH and CCGP.
5. The positive relationship that the Indian delegation has developed with the Chairperson of CCFH Dr. Karen Hulebak over the last three CCFH meetings has been immensely helpful in steering through India's points of concerns on most of the agenda items. This has also been possible because of continuity of participation in the CCFH and consistency in our approach.
6. The following documents have been progressed to subsequent steps and two of these will be presented to the CAC for adoption
  - a) Discussion paper on the management of the Committee: This document is being forwarded to CCGP for its advice on the consistency of the document with the established procedures of Codex. It is necessary that India's concerns are retained at the CCGP. It is unlikely that this document would be discussed at the CCGP session being held in April 2005 but will certainly be discussed at the CCGP session in 2006. Before that, the CCFH is likely to present this document at the CAC session in June, 2005 for discussion.
  - b) Draft Principles and Guidelines for the Conduct of the Microbiological Risk Management: This document has been forwarded to the CAC session in June 2005 for adoption at Step-5.
  - c) Draft Revision of Code of Hygienic Practices for Egg Products : This document has been forwarded to the CAC session in June, 2005 for adoption at Step – 5.

It is extremely important that the Indian delegation to the CAC session in June, 2005 ensures that India's comments are not diluted during the discussions.

7. A decision needs to be taken whether India should participate in the drafting group to develop the document on "Consideration in Establishing Effective Microbiological Treatments, including Pasteurization, for Table Eggs and Egg Products". This document would be developed as an annex to the Code of Hygienic Practices for Eggs and Egg Products under the leadership of USA with the assistance of Argentina, Australia, Denmark,

Japan, Sweden, Thailand, New Zealand, ALA and ICMSF. India has been a member of the Drafting Group for developing the Code and in light of this it is recommended that India should also be a member of the new Drafting Group.

8. With regard to the "Discussion paper on Management of the Committee", it was observed that USA was very keen to push its agenda to establish the Committee's own procedures for the management of its work. While this document will be discussed in the CCGP as mentioned above, it has also been decided that the CCFH would convene an *ad hoc* Working Group chaired by Australia to develop recommendations for consideration by the CCFH on the acceptance, revision and/or rejection of new work proposals. A decision needs to be taken whether India needs to be a part of this group. It is recommended that India may be a part of this Working Group as there are number of points in this document that are of concern to India.
9. India has been considering to suggesting that the 39<sup>th</sup> Session of the CCFH in 2007 may be held in India. Ministry of Health is aware of the suggestion, which emerged from the Shadow Committee. In case the session is to be held in India, a decision would need to be informally communicated as soon as possible to the US Codex office. In case there is a positive feed back, then it could be formally communicated.

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