Codex Alimentarius Commission
(31st Session)

Geneva
30 June - 4 July 2008

European Community Positions
Agenda item 3 - Amendments to the Procedural Manual

B. Proposed amendments to the “Format for the Commodity Standards” and to the “Relations between Commodity Committees and General Committees”.

1) Proposed Draft Provisions Applied to Contaminants in the "Relations Between Commodity Committees and general Committees" (for inclusion in the Procedural Manual) - Annex II

EC position: The MSEC support the proposed amendments

2) Proposed Draft "Amendments to the "Format for Codex Commodity Standards"" – Annex III

EC position: The MSEC support the proposed amendments and would like to make the following comments:

As regards the proposed amendments to Annex III under the heading Food Additives

“[Food Additive functional class] used in accordance with Tables 1 and 2 of the Codex General Standard of Food Additives in food category x.x.x.x [food category name] and/or listed in Table 3 of the General Standard for Food Additives are acceptable for use in foods conforming to this standard.”

The MSEC are of the opinion that the proposed change to insert the word "and" is not necessary and furthermore it could lead to a wrong interpretation that the food additive must be listed in all three Tables. This situation is not possible and therefore, the MSEC would prefer to maintain the original wording without adding the word "and".

3) Proposed Draft "Amendments to the "Relations between Commodity Committees and General Committees"" - Annex IV

EC position: The MSEC support the proposed amendments but are however of the opinion that the paragraph on methods of analysis of pesticide residues in food should be modified as follows:

Methods of analysis of pesticide residues, veterinary drugs and contaminants in food

The methods for determining the levels of pesticide residues, veterinary drug residues and contaminants in food need not be referred to the Committee on Methods of Analysis and Sampling for endorsement. The Committees on Pesticide Residues, Residues of Veterinary Drugs and Contaminants in Foods is are responsible for carrying out the steps of the Procedure.
C. Other Amendments

**Working Instructions for the Implementation of the Criteria Approach in Codex**

**EC position:** The MSEC support the proposed amendment to the Working Instructions for the Implementation of the Criteria Approach in Codex. However, the MSEC strongly recommend that the criteria for precision are further reviewed by CCMAS. The current version proposed for adoption establishes a fixed cut-off level for the precision criterion for levels below 0.1 mg/kg. In some cases for levels higher than 0.1 mg/kg a higher acceptable imprecision might be calculated from the given formula. It does not appear very logical that the criteria are stricter with regard to precision for lower than for higher levels. The MSEC therefore nourish concern that none of the currently approved Codex methods for trace elements might meet this criterion.

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**Agenda item 4 - List of Draft Standards and Related Texts submitted to the Commission for Adoption**

**CCPR: Draft Maximum Residue Limits for Pesticides in Foods and Feeds (Step 8, Appendix II)**

*European Community Competence*

**European Community Vote**

**EC position:** As already signalled at the previous session of the CCPR, the EC maintains its reservation for the adoption of the proposed MRLs for the following substances/commodities:

**CAPTAN (007):** (table) grapes, dried grapes, pome fruits and peaches

The EC does not support the advancement of the proposed MRL for table grapes, dried grapes, pome fruit and peaches because of acute dietary exposure concerns, even with an Acute Reference Doses (ARfD) of 0.3 mg/kg bw/d. Some existing MRLs (apple and pear), also give raise to acute intake problems.

**FENITHROTHION (037):** apples

The EC does not support the advancement of the proposed MRL for apples due to intake concerns.

**CCPR: Proposed Draft Maximum Residue Limits for Pesticides in Foods and Feeds (Step 5/8, Appendix III)**

*European Community Competence*

**European Community Vote**

**EC position:** As already signalled at the previous session of the CCPR, the EC maintains its reservation for the adoption of the proposed MRLs for the following substances/commodities:
**FENITHROTHION (037):** rice and wheat

The EC does not support the advancement of the proposed MRLs of 6 ppm for rice and wheat due to intake concerns.

**PHOSMET (103):** apricots, nectarines, pears and apples

The EC does not support the advancement of the proposed MRLs due to intake concerns.

**CYFLUTHRIN/BETA-CYFLUTHRIN (157):** citrus fruit and cauliflower.

The EC does not support the advancement of the proposed MRLs for citrus fruit and cauliflower due to intake concerns.

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**Agenda Item 5 - Proposed Draft Standards and Related Texts at Step 5**

**CCPR: Proposed Draft Maximum Residue Limits for Pesticides in Foods and Feeds**

**European Community Competence**

**European Community Vote**

**EC position:** The EC does not support adoption at Step 5 of the proposed draft MRLs due to acute intake concerns for the following substances/commodities:

- **Cyfluthrin/Beta-Cyfluthrin (157):** broccoli, head cabbage,
- **Triadimefon (133):** grapes
- **Flusilazole (165):** pome fruits, peach, nectarine and bovine edible offal

The EC would like to inform the CAC that as announced at the last session of the CCPR the concern forms for Triadimefon (133) and Flusilazole (165) have been sent to the Codex Secretariat and JMPR.
Agenda Item 7 – Amendments to the Codex Standards and Related Texts

PART I: EDITORIAL AMENDMENTS TO ADOPTED CODEX STANDARDS AND RELATED TEXTS

2.1.2 CODEX STAN 66-1981 (Table Olives)

The European Community and its Member States (ECMS) support changing footnote 2: “Governments, when accepting the standard, shall indicate the varieties of olives considered to be suitable” as follows: “The varieties of olives considered to be suitable should be indicated when the standard is used.”

However, the ECMS would like to reformulate text as follows: “The varieties of olives considered to be suitable should be identified when the standard is used.”

PART III: TEXTS FOR CONSIDERATION FOR REVISION OR REVOCATION

The ECMS are of the opinion that before revocation of the below mentioned texts a Codex Circular Letter could be sent to invite Codex Members and Organisations to comment on the use and validity of these documents.

- CAC/RCP 7-1974: System for the Description of Carcasses of Bovine and Porcine Species
- CODEX STAN 88-1981: Corned Beef
- CODEX STAN 89-1981: Luncheon Meat
- CODEX STAN 96-1981: Cooked Cured Ham
- CODEX STAN 97-1981: Cooked Cured Pork Shoulder
- CODEX STAN 98-1981: Cooked Cured Chopped Meat