

codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS WORLD HEALTH ORGANIZATION

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ALINORM 79/15

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX ALIMENTARIUS COMMISSION
Thirteenth Session, Rome, 3-14 December 1979

REPORT OF THE SECOND SESSION OF THE CODEX COORDINATING
COMMITTEE FOR ASIA
Manila, 20-26 March 1979

Introduction

1. The Codex Coordinating Committee for Asia held its Second Session in Manila from 20 to 26 March 1979 at the kind invitation of the Government of the Philippines. The meeting was chaired by the Coordinator for Asia Dr. Arsenio M. Regala, Food and Drug Administrator, Ministry of Health of the Philippines.
2. The session was attended by representatives of 11 countries of the Asian Region and by observers from 4 countries outside the Region and international organizations. The list of participants, including officers from FAO and WHO, is contained in Appendix I to this report.

Inaugural Address by the Minister of Health and Opening of the Session

3. The aims of the work of the Codex Alimentarius Commission were briefly outlined by Dr. R.K. Malik of FAO, who stressed the need for adequate international food regulations and standards to protect the consumer and to ensure fair trade practices. He underlined also the need for an appropriate food control infrastructure to implement these regulations. Dr. Malik extended the thanks of the Directors-General of the two Organizations, FAO and WHO, to the Government of the Philippines for kindly hosting the meeting. Dr. D.G. Chapman of WHO conveyed to the meeting the good wishes of the Director-General of WHO.
4. The second session of the Codex Coordinating Committee for Asia was formally opened with a speech by His Excellency Clemente S. Gatmaitan, Minister of Health, Government of the Philippines. On behalf of His Excellency, President and Prime Minister Ferdinand E. Marcos and of the People of the Philippines, the Minister of Health welcomed the delegates and observers to the meeting.
5. While emphasizing that food was one of the basic needs of man, the Honorable Clemente S. Gatmaitan drew attention to the fact that food did not only play an important role in health promotion and maintenance, but also served as a medium for transmission of disease in man. He stressed the great importance of international food standards for developing countries to protect their people against the import of substandard products and to ensure at the same time that exported products could find acceptance on the world market. Adequate food legislation and food control infrastructure at the national level was essential if these objectives were to be achieved. The text of the welcome address is attached as Appendix II.

Election of Vice-Chairman

6. The delegation of India, seconded by the delegation of the Philippines nominated Dr. Sabah Kachachi (Iraq) as Vice-Chairman of the session. The Committee unanimously concurred with this proposal.

Adoption of the Agenda

7. The Committee adopted the provisional agenda (CX/ASIA 79/1), with a slight rearrangement in the order of items to be discussed.

Matters of Interest Arising from the 12th Session of the Codex Alimentarius Commission, Codex Committees and related Activities

8. The Committee had before it document CX/ASIA 79/2 and Addendum 1 containing matters of interest to it.

Codex Alimentarius Commission (ALINORM 78/44)

9. The Committee noted that the 12th session of the Codex Alimentarius Commission, held in April 1978, had reviewed the work of the Commission and its working procedures, with a view to determining whether it was still in accordance with the needs of member countries including, in particular, developing countries. It was further noted that this matter would be discussed in detail under agenda item 9.

10. At the request of the delegation of India, the representative of FAO outlined the work and terms of reference of associate experts within the Associate Expert Scheme of FAO and the financial implications involved in it. It was pointed out that the actual procedure was to identify, as a first step, a post suitable for an associate expert and then approach the participant countries in the scheme for suitable candidates. The delegation of Japan stated that no decision had yet been taken by Japan on the matter of assigning associate experts in the area of food control and standards to the Asian Region.

11. The Committee was informed of the decision of the Commission to establish a Codex Committee on Cereals and Cereal Products with the terms of reference "to elaborate world-wide standards and/or codes of practice, as may be appropriate for cereals and cereal products". The Committee would be hosted by the United States and was scheduled to hold its first session in 1980. The view was expressed that countries of the Region of Asia have a great interest in standardization of products such as wheat flours, rice and other cereals which were of importance in the Region.

12. The Committee took note of developments in other Codex Committees and of the establishment of a new Committee on Vegetable Proteins. The delegation of the Philippines felt that vegetable protein derived from coconuts should also be mentioned within the terms of reference of the Committee on Vegetable Proteins. The Secretariat explained that this was not precluded and also undertook to bring this matter to the attention of that Committee.

ECE/Codex Alimentarius Group of Experts on Standardization of Fruit Juices (ALINORM 79/14)

13. The Committee was informed that the above Group had discussed a justification paper and first drafts of standards for mango juice and mango nectars. Specific attention was drawn to provision 7.1 concerning the name of the food and the proposed draft standard for mango nectar at Step 3. The Committee agreed with the delegation of India that a product containing more than 50% mango pulp could be called mango juice, a

denomination under which it was traditionally known in international and national trade, provided the label contained a complete list of ingredients.

14. The Committee was of the opinion, however, that this should not constitute a precedent for other products and agreed that decisions of this nature would have to be taken on a case by case basis.

15. The delegation of India pointed out that some analytical control was feasible to determine the proportion of fruit pulp in the product, including determination of certain components of the pulp and continuous inspection by government agencies.

16. The delegation of Malaysia referred to a paper on tropical fruit juices which it had undertaken to prepare for the Group of Experts. The above delegation proposed, and the Committee agreed, that due to work just started on draft Codex standards for guava and pineapple juices and/ or nectars there was at present no need to prepare such a document. The delegation of India offered its services for preparing a draft standard on guava juice and nectar.

Committee on Processed Fruits and Vegetables (ALINORM 79/20)

17. The Committee noted that at the 14th session of the above Committee work had commenced on proposed draft standards for canned mangoes and mango chutney and that these two standards had been submitted to governments for comments at Step 3.

18. The delegation of Iraq inquired whether it had been possible to settle the discrepancies existing as regards minimum requirements between the draft standards for dried fruit and nuts elaborated by the Codex Alimentarius Commission and by a Working Group of the UNECE. It was pointed out that at a recent meeting of the UNECE Group held in February 1979 many of these differences had been narrowed. The UNECE Group considered that there were good prospects of reconciling all the differences. The UNECE Group had recommended, therefore, that the adoption of the Draft Standard for Dried Apricots at Step 8 be deferred until all the differences had been resolved.

19. The delegation of India reiterated its proposal not to develop, at present, standards for pickles in vinegar and oil, since there was a wide variety with different composition of these products. The Committee agreed with this view.

References of Detection of Animal Body Fats and Vegetable Fats in Milk Products (Report of the 19th Session of Group of Experts on Milk and Milk Products)

20. Several delegations expressed their interest in the development of methods of analysis for the detection of animal body fat in milk derived products (butter, cheese) and vegetable fats in butter. The delegation of the Philippines pointed out that these methods were of special importance for the detection of coconut oil and maize oil. The delegation of India stated that much work in this field was being done in Indian laboratories and that the data obtained could be used in other countries.

Codex Committee on Fats and Oils (ALINORM 79/17)

21. Many delegations expressed the view that the use of colours and flavours in vegetable oils should be restricted, especially in virgin oils where these additives could not be justified on technological grounds. In certain cases, e.g. rapeseed oil and the more expensive mustard seed oil, addition of appropriate flavours and colours could be used to deceive the consumer, since it was difficult to distinguish chemically between these two oils. The Committee agreed that the use of colours and flavours in vegetable oils should be minimized and not be permitted for "cosmetic" purposes.

22. The delegation of India confirmed its interest in standards for vegetable ghee and not for mixed vegetable animal fats. The Committee agreed to this suggestion. It was pointed out that the term "vegetable ghee" was a misnomer and that it should be called "vanaspati" or hydro-genated vegetable oil. The delegation of India offered its services for the drafting of standards for hydrogenated vegetable oils.

Codex Committee on Methods of Analysis (ALINORM 79/23)

23. The Secretariat explained the revised terms of reference of the above Committee and outlined the current review of different methods.

Codex Committee on Foods for Special Dietary Uses (ALINORM 79/26)

24. The Committee had been requested specifically by the Committee on Foods for Special Dietary Uses to examine the Proposed Draft Standard for Follow-up or Supplementary Foods at Step 3, and to comment on the need for such a standard (CX/ASIA 79/2, Add. 1). The majority of the delegations expressed themselves in favour of a Codex Standard for foods to be used during the weaning period of infants as addition and supplement to breastmilk and for young children, as these products were of great importance in their countries.

25. The delegation of Thailand agreed in principle with the above proposed draft standard but considered the age limits set out within the scope and description sections as inadequate. The delegation proposed to recommend to amend the above sections to read "3 months and up" or "from 3 months onward" in view of the unsatisfactory quality of supplements now being used for feeding infants from about 2-1/2 months of age onward. The above delegation further proposed to lower the minimum content of protein to 2.5 grams (reference protein). Values for calcium and phosphorus should be lowered to 60 mg and 35 mg respectively. In Thailand no specifications were required for vitamin K, biotin, choline, magnesium, copper and zinc. Additional flavours such as banana and chicken flavour were permitted. The delegation of Thailand proposed to include in Section 7.2 (a) a provision to prescribe a total bacterial count of not more than 50,000 per gram. This proposal was supported by the delegation of Saudi Arabia, which proposed a limit of 20,000 per gram. The delegation of Indonesia stressed the need to set limits for all contaminants, not only for microbiological contamination.

26. The delegation of the Philippines pointed out that the feeding of supplementary foods should not be recommended for infants younger than 4 months as breastmilk could be considered to supply sufficient nutrients during that period. This was valid especially under inadequate hygienic conditions. Attention was drawn to the different units to which the nutrient content was related in different provisions of the standard, i.e. on essential composition and declaration of nutritive value. The delegation of the Philippines felt that the expression of nutrients related to 100 available calories might present difficulties for manufacturers and suggested therefore to express the requirements for essential composition as well as the declaration of nutritive value per 100 grams of the product.

27. In view of the use of protein sources other than milk the basis for the PER values should be reviewed and aligned to the composition of those other protein sources.

28. The view was expressed that consideration should be given to making available a pre-mix of minerals and vitamins at reduced cost to supplement the home prepared foods for infants during the weaning period. The delegation of the Philippines stated that zinc deficiencies could occur especially in rice-based diets.

29. The delegation of India reported that its country attached great importance to weaning foods and was considering national legislation for them. In no case should these foods be subjected to irradiation.

30. Several other delegations stated that their countries were considering the Proposed Draft Standard for Follow-up or Supplementary Foods and would submit their comments at a later date.

Report of the Second Joint FAO/WHO Expert Consultation on Methods of Sampling and Analysis of Contaminants (Rome, 27 February - 3 March 1978)

31. The Secretariat drew attention to the report of the above consultation. The consultation had, in particular, referred to the criteria for selection of analytical methods and recommended that it might not always be necessary to depend upon highly sophisticated instrumental analytical techniques. Quite often the needs of analysis could be met by using some of the simpler and traditional methods. Modern laboratory instruments were expensive and required considerable resources for maintenance and repairs. Most of the routine food control work could be carried out satisfactorily by using simpler but appropriate methods. It was pointed out that recently some further advances had been made in colorimetric and GLC techniques and they had good potential for exploitation in food control and food contaminants monitoring activities. In case information was available on any simpler method or technique for which work had been done in a developing country, the AOAC had offered to publish it in its journal and the member countries were free to communicate directly or through FAO with AOAC.

32. The delegation of India supported by the delegation of the Philippines referred to the difficulty in food exports where more sensitive methods were required because of the use of such methods by industrialized importing countries.

33. The delegate of Bangladesh sought information on simpler pesticide residue analysis methods. The delegate of Thailand referred to the need for a standard method for determining fat in baby foods. He also referred to the need for expediting the work of the Codex Committee on Methods of Analysis and Sampling. The Secretariat, while noting their remarks drew the attention of the Committee to the classification of methods into four types as defined by the Codex Committee on Methods of Analysis and Sampling. In this connection the delegation of India requested that, as far as possible, simple methods be included as reference methods in Codex standards.

FAO/WHO Food Control Strategy

34. The meeting had before it document HCS/78.1 (WHO) "FAO/WHO Consultation on Food Control Strategy". The document was introduced by the Secretariat. It stipulated a strategy to strengthen food control at national level and how FAO and WHO could assist countries to build up a food control system. The paper stated that sectorial approaches to develop food control should be discouraged and that food control should be implemented throughout the entire chain of food handling, from production, through processing, storage, transportation, retailing and the handling of food. Where feasible, authority for the implementation of food control should be located within one agency only. However, provisions should be made for an Advisory Board with membership from other concerned institutions, be they government bodies, producers, consumers or other bodies. With regard to inspection and surveillance, the need for adequate training in these fields was stressed, as well as the necessity to provide an appropriate status for the personnel within the food control system. For inspectorate and analytical services adequate facilities were requested. The document also stressed the aspect of public

education for both producer and consumer. Food control strategies for areas at different stages of development were outlined. The need for consumer protection in matters of food was universal and hence the food control system should be able to protect and guide populations in rural as well as urban areas, and both within subsistence and market economies.. Monitoring and education would appear to be the most important approaches that would help the rural populations, while various developmental as well as policing activities would be necessary in other situations i. e. those created by agricultural and industrial development, urbanization, etc. International cooperation and recommendations for action were discussed and suitable targets and target dates proposed for action at global, regional and national level.

35. The Committee welcomed and generally supported the strategies discussed in the document. It was agreed that a further increase of activities in the field of food control was necessary and that special emphasis should be given to training of personnel. In this connection, the delegation of Thailand informed the meeting about various training programmes sponsored by several industrialized countries on food production, processing and storage for the ASEAN countries. Under the ASEAN Australia Economic Cooperation Programme, Australia is sponsoring programmes for research into low-cost, protein-rich foods, into improved food storage, handling and transport techniques and into the management and utilization of food waste materials. The United States of America is sponsoring a programme for improvement of techniques in food processing, handling and storage, while Japan supports a Training Centre for Food Processing, for Indonesia, Thailand, the Philippines, Malaysia and Bangladesh.

36. In response to a question by the Philippine delegation, the meeting discussed ways and means to support small scale food processing factories in their quest to comply with rigorous standards for production. The meeting noted that training materials could be supplied by FAO and/or WHO for training in food control, and hygiene.

37. The delegation of India stressed the need for a change in the syllabus for training of food inspectors with a view to highlighting their role also as advisers to producers and consumers rather than merely as policing agents. The delegation informed the meeting about efforts of the Indian government in this regard.

38. With reference to the need for food control, hygiene and sanitation in rural areas, it was suggested to introduce mobile units for demonstration and on-the-spot-control. The meeting was informed about such units which were already successfully used in some ASEAN countries. Support from FAO and/or WHO in this field was sought.

39. The problem of overlapping fields of work in different UN organizations as well as in different ministries at national level was discussed. The Secretariat informed the meeting that an agreement existed between FAO and UNIDO defining the fields of work related to food quality control, standards and food processing. Due to the wide scope of problems covered, however, a duplication of efforts sometimes could not be avoided.

40. Likewise, at the national level, there sometimes existed a lack of communication between the different ministries amongst themselves and in their dealing with the different UN-agencies. To avoid such problems, it was suggested to set up a national body coordinating all activities in certain subject areas and this could help coordinating national inputs into various UN-activities. It was pointed out that such coordinating bodies were already working in some countries in the Region.

41. Since the working document under discussion had called for the establishment of reference centres for the microbiological aspects of food contamination, it was requested

by the delegation of Pakistan that consideration be given to the formation of such a reference centre in the National Health Laboratory at Islamabad, Pakistan. It was pointed out that a WHO reference centre on Viral Diseases was already in existence at that laboratory.

42. The meeting took note of a request by the observer representing IOCU to give further consideration to include consumers organizations in the Advisory Bodies on food control set up by the national governments.

43. The meeting discussed point 3 of the working document under review in detail. This point dealt with "policy considerations of components of national food control systems." The role of the Advisory Committees to the Governments was stressed once again and various delegations gave accounts of such bodies as functioning in their respective countries. It was emphasized that all parties concerned with quality and safety of food should be represented on such a body. Even though the specific functions of the respective Advisory Bodies varied slightly from country to country, the statements by the delegations made clear that this basic condition was fulfilled in almost all countries in the Region.

44. With regard to analytical facilities, the question arose whether or not to make use of private laboratories for the purpose of food control. It was generally agreed that legal food control work and laboratories belonging to the Government or local bodies should be used. Insofar as private laboratories were concerned, their main role could be to assist the food industry and trade in ensuring proper food quality control. In certain cases such laboratories could also be used in ensuring quality of exports, provided this was done within an established framework.

45. Following a recommendation in the working document under consideration, the delegation of India offered the analytical facilities available in their country for utilization as reference and/ or training laboratory for neighboring countries. The meeting took note of this offer.

Strengthening the Infrastructure for National Food Control Systems - Progress Report

46. The meeting had before it working document CX/ASIA 79/3 providing information on recent developments in assistance for food control efforts in the Asian Region. The document in particular intended to update information on projects planned or implemented since the first session of the Codex Coordinating Committee for Asia. Representatives of FAO and WHO in the secretariat presented the list of activities of their respective organizations. Whereas FAO gave priority to training programmes, development of infrastructure for food control, analytical facilities and/or monitoring programmes at national/regional level, WHO laid emphasis on food safety programmes through strengthening appropriate institutions and by conducting seminars and workshops at regional, national and local level.

47. At the request of various delegations the secretariat provided more detailed information on some of the projects mentioned in the document. A discussion evolved about the duplication of efforts of FAO and WHO. The meeting was informed of the close collaboration of the two agencies in this area, to avoid such duplication and also of further efforts in regular exchange of information. The secretariat took note of a proposal to keep informed the national Codex Contact Points about the FAO/WHO programmes related to food control and food safety.

48. In order to provide an example of the activities of an FAO short time consultant, the FAO consultant to the Government of Malaysia, who attended the meeting, gave a

short account of his activities during his assignment in Malaysia. The consultant worked with the Ministry of Health and other agencies to review the food legislation which is being up-dated, the food control organizations and co-ordination of activities, the programmes, the inspection staff required, the laboratory support services needed, management development needs, enforcement approaches, training requirements, and to make recommendations for improvement activities at the government and international level.

49. The meeting, while appreciating the efforts of FAO and WHO, again stressed that a very high priority should be given by the agencies to a further strengthening of food control infrastructures in the Region. Even though much had been done since the Joint FAO/WHO Food Standards Regional Conference for Asia in Bangkok in 1975, a consciousness and awareness of the problem still needed to be stimulated. The representatives of FAO and WHO assured the meeting that food control and food safety at national level would continue to receive a high priority within the programmes.

Regional Action Programme for Strengthening Food Control, Training and Assistance

50. The representative of FAO informed the Committee about the forthcoming technical consultation amongst developing countries of Asia on food control, needs and means. The consultation had emanated from the recommendations made at the first session of the Codex Coordinating Committee for Asia held in New Delhi.

51. The technical consultation will be held in Manila some time towards the end of August or September 1979. The main purpose of the consultation will be to discuss in detail the needs of various developing countries of the region in strengthening food control infrastructures and to consider various approaches that may be required to meet these needs. It was likely that the consultation would lead to the development of an umbrella action programme for countries of the Asian region. Such a programme could cover training in different aspects of food control i.e. food inspection, analysis, food contaminants control and monitoring; and also provide consultancy services in areas where guidance and assistance may be required by the individual countries. Any programme of this nature should make maximum use of the national institutions of the countries in the region and also experts from within the region wherever possible. The consultation will be held at a policy level, and with the support of the UNDP it will be possible to pay for the cost of travel etc. of one (1) participant from each country.

52. The Asian region of the Codex Alimentarius Commission covered the whole continent of Asia and extended beyond the FAO/UNDP Asia and Far East region. As FAO could not find resources for an inter-regional technical consultation from UNDP, it was decided to look into the possibility of having two separate meetings - one for Asia and the Far East and the other for the Near East. Funds have become available for the Asia and the Far East region and that meeting will be held accordingly. Efforts are being made to find resources for the meeting in the Near East.

53. The Committee welcomed the technical consultation by FAO/UNDP. On a question as to which of the national institutions would be involved in organizing training courses, it was informed that a detailed discussion on the subject would take place during the technical consultation itself. The delegation of India suggested that, if possible, more than one participant from any particular country should also be included.

54. As there was a great need for action at the national level to strengthen food control infrastructures and training was in fact a high priority area, the Committee fully

supported the proposed technical consultation and the development and implementation of a regional action programme.

55. It was reported by WHO that in October 1979, there would be held in Kuala Lumpur, Malaysia, a working group on food hygiene sponsored by the WHO Western Pacific Regional Centre for the Promotion of Environmental Planning and Applied Science (PEPAS). This working group will bring together participants from most WPRO Member States to discuss technical aspects of food hygiene, including the incidence of foodborne infectious diseases, control of meat and poultry products, enforcement programmes for fresh and frozen meats and the surveillance and control of biological and chemical pollutants in shellfish. It was also reported that in 1980, WPRO would hold a workshop on food safety in aviation.

56. The representatives of FAO and WHO informed the Committee that close cooperation between the two (2) agencies would be maintained during the technical consultation in Manila and the working group on food hygiene meeting in Kuala Lumpur. While the meeting in Manila would be at a policy level relating to food control action programmes, the one in Kuala Lumpur would be more on scientific and technical aspects of food hygiene. Moreover, the WHO Western Pacific covered only few countries of the Asia and Far East region of FAO.

57. The holding of the two (2) meetings within short intervals in the region should not therefore lead to duplication of efforts.

58. The Committee fully supported the proposal. Member countries may send their suggestions for discussion at the FAO proposed technical consultation by the end of June 1979.

Progress made in the adoption/adaptation of the Model Food Law by the Countries of the Region of Asia

59. The Committee had before it document CX/ASIA 79/4, which recalled the action which had been taken since the Model Food Law had been considered and generally approved by the Joint FAO/WHO Food Standards Regional Conference for Asia, held in Bangkok in December 1975. The Model Food Law had been further considered by the Coordinating Committee for Asia, at its first session, in the light of replies to a questionnaire issued to countries of the region.

60. Specific aspects of the Model Food Law considered by the Committee at its first session related to definitions, general provisions, warranty, regulations on food standards, administration and enforcement. The Committee concluded its deliberations on this subject at its first session by recommending continued favourable consideration of the Model Food Law by countries of the region and by requesting them to make available to the Secretariat information on action considered or taken "by them with regard to bringing the provisions of their national food law in line with the provisions of the Model Food Law. In addition to the countries which had replied to the questionnaire mentioned in para. 59 above, a reply had been received from Kuwait, which was attached as an Appendix to CX/ASIA 79/4.

61. The delegations present were invited to report verbally on steps being taken or contemplated in their countries as regards bringing their national food legislation into line with the Model Food Law, so far as substantive provisions were concerned.

62. The delegation of Bangladesh indicated that its current basic legislation included the Pure Food Ordinance 1959 and Pure Food Rules of 1967. The technical part of this

legislation covered all the aspects of standardization and quality control of food items and was being observed by food manufacturers. The delegation also indicated that the Pure Food Rules now needed some revisions and that national standards being developed were based to a large extent, on the recommended Codex standards. The delegation also mentioned that there was another law in Bangladesh which affected food - the Agricultural Produce (Grading and Marking) Act, 1937.

63. The delegation of India indicated that the basic food legislation in India was the Prevention of Food Adulteration Act 1954, as amended in 1964 and 1976 and that this legislation covered all of the provisions of the Model Food Law. The delegation of India referred to the Advisory Committee known as "Central Committee for Food Standards" under the Act and indicated that since 1976 there were five consumers organizations playing an important role in the work of the advisory committee. It was also stated that the Prevention of Food Adulteration Rules needed to be up-dated from time to time. In revising the standards full account was being taken of the recommended Codex standards. The standards could also be sent to other countries for comment. Guidelines for food inspectors and analysts were being revised to take into account technological and scientific developments. The quality of exports of processed foods like fish and fishery products, meat and meat products, fruits and vegetable products, etc. are subject to compulsory quality control under the Export Inspection Act.

64. The delegation of Indonesia indicated that it had no single basic food law, but that there were four Acts in force which provided the legal basis for food inspection and control. The delegation indicated that these items of legislation together contained all the substantive provisions of the Model Food Law. The main thing, the delegation stressed, was to improve manufacturing practices to achieve better quality food production, to improve distribution and infrastructure for food control. The delegation indicated that a basic food law was under preparation in Indonesia, but it would take some time before it was finalized and approved.

65. The delegation of Iraq stated that a new law was being proposed in Iraq which would be in line with the Model Food Law. It was also indicated that the Iraqi Organization for Standards was closely following Codex work.

66. The delegation of Japan recalled that it had previously made available information concerning food legislation in Japan, which was quite complex. There was a wide variety of regulations in Japan affecting food, including export inspection law.

67. The delegation of Kuwait indicated that the main law in Kuwait governing food control was largely in line with the Model Food Law, but there were some differences. This law - The Selling and Storage of Foods Act - was passed in 1977. The differences between the national food law and the Model Food Law would be examined with a view to bringing the national food law into conformity with the Model Food Law.

68. The delegation of Malaysia indicated that the main food law in Malaysia was the Sale of Food and Drugs Ordinance, 1952. This Ordinance was being reviewed with assistance from FAO and WHO and for this purpose the Model Food Law would be the basis for revision of the national law. The delegation stated that Malaysia was aiming to have a separate law for food only, i.e. distinct from the law relating to drugs. Rules and regulations under the law would also be reviewed and it was the intention to give more powers to inspectors. The delegation mentioned that there might be some difficulty, however, in respect of warranty.

69. The delegation of Pakistan indicated that the main food law in Pakistan was the Pure Food Act, 1965, which operates at the provincial level. The delegation indicated that it might require a change in the list of subjects as assigned between the centre and the provinces under the constitution to provide for the operation of a food law at the national level. The delegation also mentioned that it might be some time before it would be possible for Pakistan to have a food law along the lines of the Model Food Law. The delegation raised the question of how exports could be integrated into national food law. (See also para. 73).

70. The delegation of the Philippines informed the Committee that in the Philippines there was one national law which covered food, drug and cosmetics. The national law (Food, Drug and Cosmetics Act) had been enacted in 1963. To establish a national food law along the lines of the Model Food Law, other Ministries would have to participate and time would be needed to establish such a law. Food products for exportation were covered by the national law but were exempted from its provisions under certain circumstances ie. if (a) they conformed to the specifications of the foreign buyer, (b) were not in conflict with the laws of the importing country and (c) were labelled to show that they were, in fact, for export.

71. The delegation of Saudi Arabia indicated that in Saudi Arabia a law had been passed in 1965, which dealt with fraud and consumer protection and covered food standardization. At present efforts were being made to bring out a national food law in line with the Model Food Law. The Saudi Arabian Organization of Standards had been developing new food standards and was taking the recommended Codex standards into account.

72. The delegation of Thailand indicated that in Thailand there was a food law, with many regulations made under it. The food law was separate from the law governing drugs and cosmetics. The delegation indicated that Thailand was presently considering the revision of its food law and for this purpose would follow the Model Food Law as much as possible. Any revised food law would have to be adapted to Thai requirements. In Thailand the Ministry of Public Health was involved in all food products, including export foods, especially from the point of view of safety and consumer protection. For food exports where quality requirements and standards would be higher, it was the Ministry of Industry which was responsible. The Ministry of Commerce dealt with problems of consumer protection with regard to specific items. The delegation stated that the main problems for most developing countries were (i) lack of enforcement capabilities, (ii) the fact that there does not yet exist a code of ethics for the international trade in food, (iii) the fact that few of the importing and developing countries had accepted the recommended Codex standards. The delegation concluded by indicating that some 60 Thai food standards were similar to the recommended Codex Standards.

73. In general discussion which followed the country statements, the Secretariat indicated that the Model Food Law was intended to serve as a guide to governments, and individual Governments would be in the best position to decide how best to adapt it to their own legal and constitutional arrangements. The main aim was to provide an opportunity to Governments to see whether their own national food laws contained the same sort of substantive provisions as in the Model Food Law. Concerning the question which had been put by the delegation of Pakistan regarding exports, it was indicated that the Model Food Law was an enabling law and did provide for the possibility of controlling exports if the Government so desired. It would however, be a matter for each country to decide on the extent of and how such control should be exercised. Products for export would however, have to meet the standards or requirements of the importing countries

and it would be in the interest of exporting countries to have the power to make regulations governing food exports.

74. The observer from the Inter American Bar Association expressed the view that the Model Food Law would need to be up-dated from time to time and that it should be supplemented with guidelines. He also stated that the Model Food Law would need to be adopted or adapted in the light of national legal and constitutional requirements e. g. the Latin American approach to certain legal issues was different than the Anglo-Saxon.

75. The Committee concluded that certain positive steps were being taken and were contemplated by several countries in the region in order to bring national laws into line with the substantive provisions of the Model Food Law, taking into account the need for observing the different constitutional and legal arrangements in the different countries.

Consideration of the Problems which may be encountered in meeting the requirements in Codex Standards

76. The Coordinating Committee for Asia, at its first session, decided to include in the agenda for its second session the above-mentioned item. In order to provide the Committee with a good basis for its deliberations on this topic - more especially in view of the Commission's decision at its twelfth session to place more emphasis on the needs and concerns of developing countries - a consultant was engaged by FAO with the following terms of reference:

"To visit selected countries in Asia to determine specific problems if any in their accepting and implementing the recommended standards of the Codex Alimentarius Commission with particular emphasis on ascertaining whether, in the case of countries which export food products covered by the international standards, the standards present any difficulties for them; and

To prepare, for consideration by the Coordinating Committee for Asia, at its second session, a comprehensive report on the above topic which should also cover as appropriate:

(a) Steps being taken or which should be taken at the national level in order to be able to comply with the international standards, and

(b) Whether, from the point of view of the countries of the region, any of the provisions of the international standards are unrealistically difficult for them to meet. "

77. The countries visited by the consultant were Thailand, Malaysia, Indonesia, Philippines, India and Iraq, in that order. Because of constraints imposed by time and funds, only a limited number of countries in the region could be included in the survey. The basis for the selection of the above-mentioned countries was (i) significant food exports, and (ii) established and active interest and participation in Codex work.

78. The report of the consultant is attached as Appendix III to this report. The report was introduced by the consultant (Lt. Col. O.P. Kapur, India) who outlined its main features and gave a resumé of the results of his visit to the six countries mentioned, as well as explanations for the recommendations contained in his report. The consultant's report was divided into four parts, (a) background information leading to the terms of reference of the consultancy, (b) common observations of the countries visited, (c) specific observations of each country visited, and (d) summary and recommendations.

79. The Chairman invited general discussion on the report before proceeding to the consideration of the consultant's recommendations. The delegation of Thailand drew

attention to a serious problem which it was encountering, following its acceptance of the Recommended Standard for Canned Pineapple. Thailand had given Full Acceptance and the Recommended Codex Standard for Canned Pineapple was now the national standard in Thailand. Canned Pineapple had, therefore, to be produced in Thailand according to Codex specifications, and under the law in Thailand, no distinction was made between production for domestic consumption and production for export. The problem was that certain importing developed countries, which had not accepted the recommended Codex standard, imported canned pineapple which is not in conformity with the Codex standard. Although not compromising on food safety aspects, these importing countries had indicated that they do not require that the product meet certain quality requirements provided for in the Codex standard concerning details of style and types of pack, definitions of certain defects, etc. These particular importing countries were interested in importing canned pineapple not necessarily in conformity with all the detailed "aesthetic" quality requirements of the Codex standard, but at a suitable price. This placed Thailand in a difficult position, and the delegation of Thailand indicated that Thailand would have to consider whether in the circumstances, to withdraw its acceptance of the recommended Codex standard for canned pineapple.

80. The statement of the delegation of Thailand, together with a statement of the delegation of India referring also to difficulties encountered in exporting according to the Codex standards, as well as certain remarks of an observer in the delegation of the Philippines to the effect that exports must, of necessity, conform to the import requirements of the country in question and that the quality of a product for domestic consumption should not, necessarily have to be the same as for export, provided the product for domestic consumption was safe, gave rise to a statement from the Secretariat on the philosophy behind the methods of acceptance of Codex standards.

81. The Secretariat indicated that the objectives of the work of the Joint FAO/WHO Food Standards Programme were the protection of the consumer against possible health hazards in food and against fraud, the ensurance of fair practices in the food trade, and the facilitation of international trade through the removal of those non-tariff barriers to trade represented by differing national food standards and regulations. The aim was to establish, and have accepted by member governments of FAO and WHO, international standards for products of importance in international trade in substitution for national standards. It was inherent in the work of the Programme that governments would be asked to change their national regulations, or, where none existed, to enact national regulations in line with the international standards. Apart from the health protection aspects covered in the Codex standards through provisions on food hygiene, food additives, pesticide residues and other contaminants and the protection against fraud aspects through correct definition or description of the products and proper labelling, it was obvious that considerable trading benefits could accrue if internationally negotiated and accepted standards were to take the place of diverse national standards.

82. The rules governing acceptance of the standards had been developed after protracted discussions in several sessions of the Codex Committee on General Principles and of the Commission itself. The current rules were to be found in the Procedural Manual of the Codex Alimentarius Commission, 4th edition, in the chapter entitled "General Principles of the Codex Alimentarius". There were three methods of acceptance of recommended Codex commodity standards provided for, namely, Full Acceptance, Target Acceptance and Acceptance with Specified Deviations. A country giving Full Acceptance undertook to ensure that products in conformity with the Codex standard would be permitted to be distributed freely in its territorial jurisdiction. The

obligation resulting from acceptance related to products circulating in the national territory, be they imported or home-produced. A country giving Full Acceptance was not required, as a matter of obligation under this method of acceptance, to apply the Codex standard to exports, although it was obvious that if an importing country accepted the Codex standard, then, by that fact, the exporting country would have to apply the standard to exports also. The aim was to achieve world-wide harmonization of standards through gradual acceptance of the international standards by all - both importers and exporters. The reason countries were not asked, as a matter of obligation under the acceptance procedure, to undertake to apply the Codex standards to exports was that this could result in placing an exporting country which had accepted the Codex standard at a disadvantage vis-à-vis rival exporting countries which had not accepted the Codex standard in a situation where all of them were exporting to a country or countries which had not accepted the Codex standard. Under Codex methods of acceptance a lower level standard for domestic consumption was not provided for. Since the obligations under acceptance relate to products moving in trade in the national jurisdiction, be they home produced products or imported products, there could be only one applicable standard for the product, whether it was home-produced or imported. To countenance less stringent requirements for the home produced product, under this method of acceptance, would be to place the foreign competitor at a disadvantage vis-à-vis the domestic producer.

83. Target Acceptance was designed mainly to enable countries whose food industries were not yet sufficiently developed to have time in order to be in a position to implement the standards at a future date. Thus a country using this method of acceptance stated its intention to accept the standard at a future date when it would also be applied to home-produced products circulating in the country, but in the meantime undertook to permit the importation of products in conformity with the international standard. In this way international trade was facilitated.

84. Acceptance with Specified Deviations was intended to give countries which could accept most, but not necessarily all the provisions of a Codex standard, the opportunity of indicating their degree of acceptance.

85. Under the procedure, a country which felt it could not accept a Codex standard under any of the above methods of acceptance was required to indicate whether products in conformity with the Codex standard would be permitted to enter that country. This would be useful information for exporting countries and would, therefore, facilitate international trade.

86. The delegation of India indicated that the problem for developing countries which had accepted the Codex standards and were taking steps to gear their food industries to these standards was that, having made the necessary changes in legislation and in production arrangements, they would like to export in accordance with these international Codex standards. The difficulty was that the main importing and developed countries had as yet given very few acceptance to the standards. This was the crux of the problem. It was essential that the importing countries accept the Codex standards, and it was very discouraging for developing countries which were being asked to accept the standards and were showing willingness and readiness to do so, to be confronted with comparatively little positive action on the part of the developed countries.

87. The delegation of India indicated that under Indian legislation, it would not be possible for India to export products which fell below the national standards of hygiene. This thinking was in line with the thinking which inspired the draft Code of Ethics for the

International Trade in Food. It would be unethical to countenance the exportation abroad of food products classified in India as sub-standard. On this analogy, if India were to give Full Acceptance to a Codex standard and if the Codex standard were to become the Indian national standard, it would not be possible for India to permit the export of a product which fell short of the requirements of the Codex standard in the field of food hygiene, or which, in other words, was sub-standard.

88. The delegation of Saudi Arabia stated that the problem Saudi Arabia had to face was one of dumping of sub-standard food products, given its limited food control and inspection facilities. In reply, it was stated that it would be to the advantage of Saudi Arabia, as a mainly importing country, to accept the Codex standards and the measure of protection afforded by them. However, it would also be necessary to strengthen the food control facilities as rapidly as possible, in order to be able to protect it self fully against dumping. Reference was also made in this connection to the draft Code of Ethics for the International Trade in Food.

89. The delegation of Bangladesh indicated that in Bangladesh the recommended Codex standards were being taken very much into account in the development of national standards. It too was concerned at the possibility that having accepted Codex standards and working to implement them, it would be faced with difficulties concerning exports, arising from non acceptance as yet of the standards by the importing developed countries in general. The delegation of Bangladesh referred to certain problems which arose for it in connection with the export of frozen shrimps. The delegation of Bangladesh wished to have its view recorded as follows: Codex standards should be made applicable to products for export as well as to imported and home produced products moving in a country. The delegation stated that it had transpired during the course of the Committee's deliberations that there was a need for applying the Codex standards to exports as well as to imports/home consumption. The delegation also stated that it had been emphasized that it was vital for strengthening the infrastructure for national food control systems to export food items conforming to Codex standards. The delegation recommended, therefore, that Codex standards should be applicable to exports as well as imports.

90. The delegation of the Philippines indicated that in the Philippines the Codex standards were being used as a basis for national standards. The Codex standards were regarded as very good guidelines and the Philippines had given acceptance to several of them.

91. The delegation of Malaysia referred to difficulties which Malaysia had been experiencing in connection with the exportation of cooked peeled frozen prawns. A number of Malaysian consignments of this commodity had been rejected by developed countries. The delegation indicated that it would not be advantageous to accept Codex standards as long as the importing countries were not accepting them. The Secretariat drew the attention of the delegation of Malaysia to the microbiological specifications for precooked frozen prawns under development to be attached to the Code of Hygienic Practice for Frozen Shrimps or Prawns.

92. The delegation of Iraq expressed the view that the difficulties which had been raised, particularly as regards exports, were real problems. The delegation agreed with the views which had been expressed by the other delegations on this matter. The delegation thought that greater efforts should be made to achieve more cooperation and trade among the countries of the region itself and that for this purpose the Codex standards should be used. The delegation of Bangladesh supported this view.

93. The delegation of Kuwait stated that it was in the process of building up its food control infrastructure, but that this would take time. The delegation indicated that products in conformity with Codex standards would be permitted entry into Kuwait.
94. The delegation of Pakistan urged that the problem referred to concerning Codex standards and exports based on them be brought to the attention of the Commission. The problem could be solved only if the importing countries as well as the exporting countries accepted the standards.
95. The delegation of Japan indicated that it was in the process of examining the Codex standards to determine to what extent they could be accepted. The delegation stated that one of the difficulties was that in Japan there were already national food standards.
96. The delegation of Indonesia drew attention to certain corrections which needed to be made in the consultant's report on his visit to Indonesia.
97. The part of the consultant's report dealing with the problems for developing countries arising from the absence as yet of any significant number of acceptances from the importing developed countries, gave rise to most of the discussions on the report. However, the other aspects of the report were also considered and delegations expressed their views on them.
98. The delegation of Bangladesh stressed the importance of transfer of technology, as referred to in the consultant's recommendations. The delegation also stressed the great importance of strengthening food control facilities. The delegation of Bangladesh observed that participation in the Food Standards Programme needed to be encouraged. In order to achieve this objective, the delegation recommended that funds be made available - at least to LDCs (least developed countries) - for attendance at one or two important Codex meetings in a year.
99. The need for improving technology at the national level was stressed by the delegation of the Philippines. This view was supported by several delegations. The desirability of looking at technological alternatives was stressed by the delegation of Iraq, as for example, new packaging possibilities. Concerning the recommendation of the consultant on maximum levels for tin, there was general agreement that this figure should be 250 mg/kg in all canned fruits, vegetables and juices. This level would be reasonable, more especially in view of the conclusions of the 22nd session of the Joint FAO/WHO Expert Committee on Food Additives concerning toxicity of tin.
100. A suggestion was put forward that probably the problem of acceptances might be eased if the standards were less detailed in certain quality or aesthetic matters, or indeed if the standards were to be confined to food safety matters. The Committee was informed by the Secretariat that the question of simplified standards had already been considered by the Codex Committee on General Principles and that the matter would come up again for discussion at the next session of the Committee, which was expected to be held in Paris in October 1979. The prevailing view in the Committee on General Principles up to now has been that while simplified standards might gain many more acceptances, whether they would achieve the aim of facilitating international trade was doubtful, because countries would impose their own national requirements on quality matters, etc. The views of the Asian Committee would however be brought to the attention of the Codex Committee on General Principles as well as of the Commission.
101. The observer from IOCU commented that the consultant's report did not indicate any dialogue with IOCU member organizations in the countries he visited. It was

indicated that every effort had been made to contact the President of the IOCU, Mr. Anwar Fazal, Malaysia, but that this had not proved possible at the time. The Secretariat indicated that the greatest importance was attached to the contributions of IOCU to the work of the Programme. The IOCU was represented at Commission and at many Codex session and Mr. Fazal had been engaged as a consultant to draw up the Draft Code of Ethics for the International Trade in Food.

Consideration of Recommendations of the Consultant

102. The Committee considered the recommendations of the consultant as set forth in paragraphs 54 to 66 of his report (Appendix III). The Committee endorsed the statement contained in para. 54 of the consultant's report.

103. The Committee strongly endorsed the recommendation in para. 55 of the consultant's report that importing (developed) countries be urged to accept the Codex standards inter alia, so as to enable acceptance without adverse effects on developing countries. The Committee felt that this matter was so important that it should be brought specifically to the attention of the Commission.

104. The Committee considered the recommendation at the end of paragraph 55, that it might become necessary to accept Codex Standards in steps, impressing on all member countries and especially developing (exporting) countries that they should initially accept at the national and international levels the hygiene requirements laid down in Codex standards to protect consumers from health hazards. The Committee agreed that all countries, and particularly the exporting developing countries, should accept the hygiene requirements, but that as these were inseparable from other parts of the standards, such as essential composition, it would not be feasible to take the hygiene requirements in isolation. The Committee agreed, however, that secondary quality requirements, if it was necessary to stipulate them at all, should be made optional, subject to mutual agreement between importer and exporter. The Committee recommended therefore, that all member countries, including exporting developing countries, should consider the acceptance of all parts of Codex standards (not just the hygiene section) except those parts including the secondary quality requirements, as referred to in paragraph 56 of the consultant's report. The Committee agreed that these less essential requirements of the Codex standards might remain as goals to be reached over a period of time, with assistance from international agencies, such as FAO, and with transfer of appropriate technology.

105. As regards paragraph 57 of the consultant's report concerning the need for laying down microbiological limits for precooked frozen shrimps or prawns to prevent unfair rejections by importing countries, the Committee was informed that this matter would be considered by the Codex Committee on Fish and Fishery Products at its next session to be held in Bergen, Norway, from 7 to 11 May 1979.

106. Concerning paragraph 58 of the consultant's report with which the Committee agreed, the Committee, taking into account the remarks of the Joint FAO/WHO Expert Committee on Food Additives regarding tin toxicity, agreed that there was no good reason for not fixing the level of tin in Codex standards at 250 mg/kg. The Committee agreed that this matter should be brought to the attention of the Codex Commodity Committees concerned and the Codex Committee on Food Additives.

107. Concerning the general question of packaging and the question of standards for OTS Tin Plate and lacquers, the Secretariat indicated that the appropriate UN body to deal with packaging was UNIDO. The Committee was informed of the assistance being

given or proposed to be given by UNIDO in the field of packaging to several countries in the Region, namely India, Korea, Indonesia, Philippines, and also about the proposed meeting on packaging to be organized by UNIDO in collaboration with Yugoslavia. On the other hand, ISO seemed to be the most appropriate international body to deal with the question of standards for OTS tin plate and lacquer. The delegation of Thailand stated that the main interest of UNIDO was in flexible packaging and not so much in tinplate. The Committee agreed to request UNIDO to consider the feasibility of convening a working group from countries of the Asian region with a view to developing cooperation amongst those countries for the manufacture of the right quality of tin plate from indigenous sources and other appropriate and cheaper packaging materials. The Committee agreed to refer for consideration by the Commission the question of how to proceed with the development of standards for OTS tin plate and lacquer.

108. As regards paragraph 61 of the consultant's report, the Committee endorsed its consultant's recommendations, particularly the recommendations that the staffing of national Codex Contact Points needed to be strengthened.

109. The Committee endorsed the recommendations of the consultant in paragraph 62 of his report concerning the use of food additives, especially coal tar colours and synthetic flavours and agreed that this matter should be referred to the Codex Committee on Food Additives.

110. Concerning the recommendation on tropical fruit cocktail, the Committee noted that in addition to the recommended standard for Canned Fruit Cocktail, there was also a recommended standard for Tropical Fruit Salad. The Committee agreed to recommend to the Commission that the recommended standard for Tropical Fruit Salad be amended so as to allow this product to be designated 'Tropical Fruit Cocktail', as an alternative to Tropical Fruit Salad. The name of the food would then be 'Tropical Fruit Salad' or 'Tropical Fruit Cocktail'.

111. The Committee endorsed the consultant's recommendations in para. 64 of his report on the need to strengthen food control services.

112. As regards the specific standards listed in paragraph 65 of the consultant's report, the Committee agreed that the standards listed should be referred back to the Commodity Committees concerned for reexamination.

113. The Committee supported the concluding recommendation set out in paragraph 66 of the consultant's report, and particularly endorsed the recommendation concerning the strengthening of the Codex Secretariat and the use of consultants.

114. The Committee congratulated the consultant for the excellence of his report.

Consideration of Problems in meeting the Requirements for Tin Content in some Codex Standards for certain Canned Fruit Juices and Canned Fruits and Vegetables

115. The Committee, at its first session, requested the delegation of India to prepare a paper on the above subject for consideration at its second session. The paper, which is attached as Appendix IV to this report, was introduced by the delegation of India. The paper outlined the action which had been taken so far on this subject by the Joint ECE/Codex Alimentarius Group of Experts on Standardization of Fruit Juices, the Codex Committee on Processed Fruits and Vegetables and the Commission itself. In particular the Codex Committee on Processed Fruits and Vegetables drew attention to the work to be done on this topic by a Working Group set up by the Committee on Processed Fruits and Vegetables at its last session.

116. The observer from Australia indicated that many of the problems encountered in connection with tin content in canned fruit juices and canned fruits and vegetables were familiar to Australia, with its large tropical area. Australia noted that the current recommended maximum levels for tin were temporary only and subject to review. Australia had been appointed Chairman of the Working Party on Contaminants of the Committee on Processed Fruits and Vegetables, and would be circulating a questionnaire in April 1979 to Codex Contact Points. The full provision of instructions by Asian countries in response to the questionnaire would enable the working party to take Asian considerations fully into account in the preparation of its recommendations. The observer indicated that, if the Committee desired, Australia could collate the Asian data separately from the data from other countries.

117. As decided previously, the Committee agreed that the level of tin content should be fixed at 250 mg/kg until the completion of toxicological studies showed a need to do otherwise.

Specific Labelling Provisions for Processed Meat Products with regard to Islamic Religious Requirements

118. The Committee, at its first session, had agreed to include the above item on the provisional agenda of its second session and had requested the delegation of Malaysia to prepare a paper on this topic. The delegation of Malaysia introduced and outlined the main features of the paper which was a Conference Room Document.

119. The delegation of Malaysia made the point that the concept of consumer protection should not be confined to health and technical factors only but must also include the protection of the cultural values, traditions and attitudes of the consumer. The need to protect the Muslim consumers who have to abide by Islamic religious requirements is an example. The acceptance and inclusion of the cultural factor into the concept of consumer protection should be worldwide and not limited to national level only since it involves a large portion of world community. The delegation of Pakistan made the point that the issues covered in the paper were of importance to Muslim countries in general, and not just in the region of Asia. The delegation also indicated that the issues affected not only meat products but all foods which contain meat and meat products.

120. Several other delegations agreed that the issues contained in the Malaysian paper merited further study. The delegation of Saudi Arabia stated that it supported the principles of labelling all meat products (cattle, poultry, sheep, food products containing meat, etc.).

The delegation indicated that the format and the basis for this labelling would need to be defined by a Working Group composed of qualified (technically and religiously) experts from different Muslim countries. The delegation added that it would be desirable for the working group to be convened as soon as possible and report to the Codex Alimentarius Commission.

121. The Secretariat informed the Committee that the question of labelling of meat products to conform to Muslim requirements had been briefly discussed at one stage in the Codex Committee on Processed Meat and Poultry Products. The general consensus in that Committee at the time had been that this was a matter best left to national legislation in Muslim countries, as supplementary labelling requirements.

122. There was general support in the Committee for the above proposal of the delegation of Saudi Arabia and there was general agreement in principle with the aim of

the Malaysian paper. The delegation of Saudi Arabia was asked whether it would be willing to host the meeting of the working group in Saudi Arabia and to chair the session. The delegation stated that Saudi Arabia would be willing to host the meeting of the working group, but this would need to be confirmed with the appropriate authority in Saudi Arabia. As regards the chairing of the session, the delegation tentatively agreed to accept the chairmanship. It was understood that the delegation of Saudi Arabia would inform the Codex Secretariat in Rome as soon as it was definite that Saudi Arabia would host the meeting. Concerning the question of reporting on this topic to the Codex Alimentarius Commission, it was noted that the next session would be held in Rome from 3 to 14 December 1979.

123. The Secretariat indicated that as soon as it had definite information concerning the hosting of the meeting by Saudi Arabia, it would issue a circular letter (CL) to all Codex Contact Points throughout the world informing them about the meeting. The invitations to attend the meeting would, however, be a matter for Saudi Arabia, since the meeting was an ad hoc meeting of a Working Group for a particular purpose and not a Codex meeting. The delegation of Pakistan, Kuwait and India indicated the interest of their countries in participating in the meeting of the Working Group.

124. The Committee requested that the Codex Secretariat be represented in the meeting of the Working Group. The Committee decided that the Malaysian paper, which would be considered by the Working Group, should be attached to the Committee's report (see Appendix V).

Review of the Programme of Work and Priorities of the Codex Alimentarius Commission and of its Rules of Procedure and Working Procedures for the Development of Standards

125. The Committee, at its first session, decided to include the above item in the agenda of its present session. Among the Committee's priorities for future work, the Committee, at its first session, decided to review the programme of work and priorities of the Commission to determine to what extent they responded to the needs of the Region of Asia. To facilitate the Committee's deliberations, the Committee had before it a document prepared by the Secretariat entitled "Consideration of the Work of the Codex Alimentarius Commission" CX/ASIA 79/5. The document, which was introduced by the Secretariat, outlined all of the developments which had taken place at the 12th session of the Commission within the context of the Commission's decision to place more emphasis on the needs and concerns of the developing countries in the food standards and related fields.

126. The Secretariat drew particular attention to the document entitled "Review of the Direction of the Work of the Commission" (ALINORM 78/8), which had been prepared by the Secretariat, on the instructions of the Executive Committee of the Commission, and which formed the basis for the Commission's review of the general direction of its work. The Committee was informed that the Commission had carried out a very detailed review and assessment of its work, in order to determine whether all of it still responded adequately to the present needs of Member Governments and to consider whether some shifts in emphasis or changes in priorities might be needed.

127. The Committee took note of the Commission's decision concerning the adjournment sine die of certain Codex Committees and the creation of two new Committees of significance for developing countries. The Committee also took note of and agreed to the revised terms of reference proposed for the Coordinating Committees.

The Committee also noted the addition which had been made to the criteria for the establishment of work priorities.

128. The particular attention of the Committee was drawn to the Commission's decision to amend its Procedure for the Elaboration of Codex Standards, in order to enable not only technical comments to be made on the draft standards, but also comments on the economic implications of the standards. The Committee was informed that the mechanism for dealing with any trade impact statements received from Governments would be considered by the Codex Committee on General Principles at its next session in Paris, expected to be held in October 1979.

129. The Committee was also informed of the conclusions of the FAO Programme Committee and FAO Council concerning the work of the Commission, and noted that the policy reorientation of the Commission had been welcomed by both these bodies. The Committee requested that the relevant extract from the Report of the FAO Council be attached as an appendix to the present report. (Appendix VI).

130. Noting the action which had been taken by the Commission to make its work responsive to the needs of developing countries and to the increasing momentum in this direction in several Codex Committees, and noting also the views of the FAO Council, the Committee agreed that no further action was required at this time.

131. The Committee, at its first session, had decided to review the Rules of Procedures of the Commission and its working procedures for the development of standards, in order to see if they could be improved in the interest of, among other things, reducing the period of time required for the development of recommended Codex Standards.

132. The Secretariat outlined the procedures for the elaboration of standards and referred to the provisions therein permitting certain steps of the elaboration procedure to be omitted, thus accelerating the process of development of standards and reducing the period of time for their development. The delegation of India, which had expressed a keen desire to see the period of time required for the development of standards reduced, agreed that the procedures permitting omissions of steps might be a way for India to advance rapidly the development of standards. Other Business (including proposals from delegations for new standardization work)

133. The delegation of Thailand raised a question concerning the different approaches to date marking. The Secretariat referred to the guidelines on date marking for Codex Commodity Committees, which had been adopted by the Commission at its 12th Session. The Secretariat indicated that each Commodity Committee would have to consider what would be the most suitable kind of date marking for the products dealt with by it. In this connection, it would be of great assistance to Commodity Committees if Governments would send to them their views on date marking for the different kinds of products. The delegation of Malaysia indicated that there was a growing interest in Malaysia in date marking of foods. The Committee agreed to include in the agenda for its next session the subject of difficulties encountered from the different approaches of Codex Commodity Committees to the various kinds of date marking.

134. The delegation of Pakistan proposed that international standards be elaborated for carbonated soft drinks, particularly cola based drinks, as there were problems with these products in developing countries. The delegation considered that the elaboration of international standards for these products was an urgent matter. The Committee agreed to recommend to the Commission that international standards be developed for

these products. The delegation of Pakistan was requested to prepare a justification paper on this subject for consideration by the Commission at its next session. The Secretariat informed the Committee that there was in existence a Codex Advisory List of additives approved for use in soft drinks.

135. The observer from IOCU stated that there was a need for an international standard for filled milk, including labelling and tin and lead content. The Secretariat indicated that the subject of filled milk had been considered by the Joint FAO/WHO Committee of Government Experts on the Code of Principles concerning Milk and Milk Products, and that a report on action taken in that Committee would be made available to the Committee at its next session.

136. In reply to an inquiry from the observer from IOCU, the Secretariat indicated that there was a specification for monosodium glutamate developed by the FAO/WHO Joint Expert Committee on Food Additives and also that in the international Codex standards for baby foods the use of monosodium glutamate was not permitted. As a further clarification the Committee noted that the use of food additives in general was not recommended by the Joint FAO/WHO Expert Committee on Food Additives in the case of foods for infants under the age of 12 weeks.

137. The Committee noted that invitations to Codex sessions were sent to Ministries of Agriculture, Health and Foreign Affairs and Codex Contact Points. The delegation of Bangladesh referred to problems which arose from time to time in connection with the receipt of invitations to Codex Committee sessions and of Codex documents. The delegation felt that it would be helpful if the invitations to Codex Committee sessions indicated also the name and address of the Codex Contact Point in the country to which the invitation was sent. The Secretariat indicated that there would be certain difficulties with this proposal. A number of delegations indicated that they experienced similar problems to those mentioned by the delegation of Bangladesh. The Committee recommended that member countries in the region should review their Codex Contact Point arrangements and ensure internal coordination between the different Ministries in relation to invitations to Codex Committee sessions and Codex work generally. The Committee also recommended that countries in the region should strengthen their Codex Contact Points. The Committee further recommended that member countries which had not done so should establish National Codex Committees.

Nomination of Coordinator

138. The Secretariat explained to the Committee the rules governing the appointment and period of office of Coordinators, as laid down in the Rules of Procedure of the Commission. The present Coordinator for Asia, Dr. Arsenio M. Regala (Philippines), informed the Committee that as it was the view of the Philippine authorities that the position of Coordinator should rotate amongst the various countries of the region, he would not be going forward for a second term.

The Committee expressed its regret that Dr. Regala would not be available for a second term of office.

139. The delegation of Thailand proposed that Dr. D.S. Chadha (India) be appointed as Coordinator to serve from the end of the 13th to the end of the 14th session of the Commission, as Dr. Chadha had been associated with the Committee's work for a long time and had made useful contributions to the work of the Committee. This proposal, which was seconded by the delegation of Bangladesh, received the unanimous approval of the Committee.

140. The leader of the delegation of India (Mr. T.V. Antony), in replying to the above proposal, considered it to be an honour that a delegate from India should have been unanimously proposed to be the next Coordinator. As he, however, had no brief for selection of a particular person, he wished to place the matter before the Government of India for approval. He also indicated that the result of this consultation would be conveyed immediately to the Codex Secretariat in Rome which in turn, would inform member countries. Dr. Chadha expressed his appreciation to the Committee for having nominated him.

141. The Secretariat in commenting on the rules, mentioned that Coordinators were appointed in a personal capacity, and hence the name of the Coordinator had to be mentioned in making a proposal. If the present nomination was acceptable to the Government of India, it would be placed before the Commission at its next session for approval. In the normal course, such approval would present no difficulty. If, however, India suggested some other name, the same would also be considered by the Commission. The Committee also noted that it was possible for Coordinators to be nominated and appointed at sessions of the Codex Alimentarius Commission.

142. The Committee congratulated Dr. Regala for the particularly good preparation for the session, for the excellence of the actual arrangements for the session, and for the very efficient manner in which he had presided over the Committee's deliberations. The Committee also congratulated the Coordinator-designate (Dr. Chadha) on his nomination.

Date and Place of the Third Session of the Coordinating Committee for Asia

143. The Committee was informed that the next session would, in all probability, and subject to consultation with the host government and approval by the Codex Alimentarius Commission, be held towards the end of 1980 or very early in 1981.

Vote of Thanks to the Government of the Philippines

144. The Committee wished to place on record and to express to the Government of the Philippines its sincere appreciation of the Government's generosity in having kindly provided host facilities for the session. The Committee also wished to express its appreciation of the excellent arrangements for the session and for the very generous hospitality extended to delegates during the course of the session.

APPENDIX 1

LIST OF PARTICIPANTS (*) LISTE DES PARTICIPANTS LISTA DE PARTICIPANTES

(*) The Heads of Delegations are listed first.
Les chefs de délégations figurent en tête.
Figuran en primer lugar los Jefes -de las delegaciones.

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APPENDIX II

SPEECH BY
MINISTER CLEMENTE S. GATMAITAN
OPENING CEREMONY
CODEX COORDINATING COMMITTEE FOR ASIA
Midtown Ramada Hotel
Second Session, Manila 20-26 March 1979

Ladies and Gentlemen,

The Philippines is honoured and privileged to host the Second Session of the Codex Alimentarius Coordinating Committee for Asia, which is being sponsored jointly by the Food and Agriculture Organization and the World Health Organization. We are equally honoured by the presence of distinguished delegates, observers and guests who come from various countries of Asia and from other parts of the world, who share common interest in matters relating to food. On behalf of His Excellency, President and Prime Minister Ferdinand E. Marcos and of the Filipino people, I welcome you all to the Philippines.

The reason for our interest in this session springs from the fact that the issues involved relate to food, one of the basic needs of man, which not only plays an important role in health promotion and maintenance but also serves as a medium for transmission of disease in man and in line with WHO'S goal of achieving an acceptable level of health by the year 2000, one way of insuring the realization of this goal is to provide the world population with safe, wholesome and nutritious food.

The establishment of the Coordinating Committee for Asia, is indeed a laudable gesture of the Codex Alimentarius Commission. However, this creates a big challenge for us in this region in the field of international food trade.

In the face of present day economic problems, we in the Asian region should be more vigilant and prepared to face this challenge, which calls for a mobilization of human, intellectual and material resources in the field of food quality control and food legislation in order that we may achieve whatever infrastructural framework that may be needed to insure fairness and to eliminate fraudulent trade practices in food.

I note with interest that this session has included in its agenda such vital issues as strengthening of the infrastructure for national food control system, the reconsideration of specific problems encountered in Asia in the development and elaboration of Codex standards. I hope these subjects will merit the serious consideration and attention of the Asian countries.

I believe that international food standards have great economic implications for developing countries and we have to accept the concept that standards represent the best compromise between the exigencies of consumer quality and the limitation of production. The regional standardization exercise should look at the inclusion of Codex criteria in national legislation.

As we are all aware, some Asian countries are heavily dependent on imports for their food supply. In others, observations are that, the food distribution systems are still comparatively underdeveloped, and marketing, distribution facilities and arrangements are such that they may lead to spoilage, wastage, contamination and reduction in the quality of foods.

We should aim to stop any attempts to use our region as a dumping ground for sub-quality products, whether they are food items or other goods. We should see to it that the composition and quality of the foods which we import are commensurate with the amount of foreign exchange which we spend in importing them.

The protection of the consumer against the health hazards in food is so fundamental a need that governments everywhere subscribe to it. It is, however, not enough that a country should protect only its own citizens against the risks of using substandard quality foods produced in domestic markets or brought into the country through imports; it is also essential, in these times of international cooperation in trade, that we must insure that products exported to other countries do not carry health risks to the importing nations. Several countries in Asia are important exporters of primary foods and even processed foods. It is to our own interest, in order to increase our export earnings to see to it that we are capable of meeting international standards and we must have the means of ensuring compliance, through adequate food control services. Quality is an indispensable attribute to the product of any industry. Without it, no industry is really secure, much less can it be expected to prosper.

In a developing country like the Philippines where our concerted efforts are geared toward a more accelerated pace of industrialization, quality and quality control deserve timely emphasis if the industries we set up are to be made lastingly viable.

In the food industry, for instance, the need for quality control is all important. This call for comprehensive standardization of raw materials, production processes, equipment, tests and the product itself. Food should only be produced under conditions that would ensure their dependable and unchanging quality if we expect continued preference and patronage.

It is only through the cooperation of the manufacturer, the consumer and the government that quality consciousness can be developed. Failure to meet these requirements can result in serious economic loss.

This session is therefore called upon to look very closely at those issues that relate to Codex criteria as an essential ingredient in the elaboration of a Model Food Law and those that relate to the setting up of a stronger regional grouping to consolidate the work of the Coordinating Committee.

I am happy to learn that the Joint FAO/WHO Food Standards Programme will establish workshops and consultations concerning the training of food inspectors in the development of food control infrastructure in the region. The first kind of workshop as I was informed, will be held in the Philippines in August and will include participants from the Asian region.

The birth of the Coordinating Committee is favourable for Asia and it is our duty as members to nurse and nurture it. The process may call for the adoption of a mutually acceptable formula with the end in view of bringing up a functional and dynamic committee whose actions will not be characterized by just recommendations and hollow resolutions.

I believe that in the course of your deliberations you will consider thoroughly the need for an adequate food control infrastructure and the adoption and enforcement of food standards and other regulations, whether national or international. You, the experts, are in the best position to actively contribute to the efforts of the Commission along this line. The outcome of this session should result in better food legislations and standards tailored to the needs of the Asians.

I hope that I have succeeded in focusing your attention on matters to which serious thought should be given. Let me say in conclusion that the world is watching and listening as you deliberate. You must therefore aim at maximizing results.

It is therefore, with the feeling of great hope and expectation that I formally open this second session of the Coordinating Committee for Asia.

I wish you success in your deliberations and a very pleasant stay in Manila.

Agenda Item 10

JOINT FAO/WHO food standards programme

COORDINATING COMMITTEE FOR ASIA

Second Session Manila, 20 - 26 March 1979

CONSIDERATION OF PROBLEMS WHICH MAY BE ENCOUNTERED IN MEETING
THE REQUIREMENTS IN CODEX STANDARDS

(Paper prepared by Mr. O. P. Kapur, Consultant)

INTRODUCTION

Background of the Consultancy

1. During the First Session of the Codex Coordinating Committee for Asia (held in New Delhi from 10-16 January 1978), it was highlighted in the inaugural address of His Excellency, Shri Raj Narain, Union Minister of Health and Family Welfare, Government of India, that, concerning food exports, whether raw agriculture products or processed foods, in some cases the standards recommended by the Codex Alimentarius Commission might not, be fully attainable. However, the need for exported products to meet in particular the hygiene requirements of the importing countries was fully appreciated.
2. As a result of further discussion, the Codex Coordinating Committee for Asia agreed to discuss at its next (second) session, the following agenda item:
"Problems which may be encountered in meeting Codex standards"
3. Later on, during the Twelfth Session of the Joint FAO/WHO Codex Alimentarius Commission, held in Rome from 17-28 April 1978, attention was drawn to the discussion at the FAO Committee on Commodity problems and the FAO Council, when the following points had been suggested as criteria for re-examining Codex work with a view to its improvement:
 - (a) Consider the relevance of the standards from the point of view of the developing countries.
 - (c) Determine the impact of the standards on the growth of food industries in developing countries.
 - (d) Take account of the needs of emerging food industries in developing countries.
 - (e) Consider the effect of the standards on the export earnings of developing countries.
4. A Consultant was engaged to collect background information for the discussions at the second session of the Codex Coordinating Committee for Asia under the above-mentioned agenda item.
5. The terms-of reference for the consultancy were:
"To visit selected countries in ASIA to determine specific problems if any in their accepting and implementing the recommended international standards of the Codex Alimentarius Commission with particular emphasis on ascertaining

whether in the case of countries which export food products covered by the International Standards, the standards present any difficulties for them.

6. To prepare for consideration by the Codex Coordinating Committee for Asia at its Second Session a comprehensive report on the above topic which should also cover as appropriate:

- (a) steps being taken or which should be taken at the national level in order to be able to comply with international standards and
- (b) whether from the point of view of the countries in the region, any of the provisions of the international standards are unrealistically difficult for them to meet.

7. The following countries were visited:

- | | |
|----------------|---------------------|
| 1. Thailand | 25-31 January 1979 |
| 2. Malaysia | 1-6 February 1979 |
| 3. Indonesia | 7-11 February 1979 |
| 4. Philippines | 12-17 February 1979 |
| 5. India | 18-24 February 1979 |
| 6. Iraq | 25-28 February 1979 |

A list of persons met during the visit is given at Annex I to this paper.

8. A part, of the period of the consultancy was spent at FAO headquarters in Rome to discuss the terms of reference and review the background materials on the subject matter before undertaking the visits to selected countries referred to above, and after the visits, to finalize the present paper.

Common Observation by the Visited Countries

9. Various Recommended International Standards for Foods, Codex Maximum Limits for Pesticide Residues, Methods of Analysis and Recommended Codes of Hygienic and/or Technological Practice have proved very useful references and guidelines to frame National food standards in individual countries. The majority of the countries have prepared, or are in the, process of drafting a large number of national food standards based, on the data given in various published Codex standards..

10. Full Acceptance, Target Acceptance, or Acceptance with Specified Deviations, as envisaged in the General Principles of the Codex Alimentarius Commission, has not been implemented by the majority of the visited countries for they are in the process of drafting food regulations; including food standards, and establishing or strengthening the infrastructure necessary to implement these regulations.

11. There is general agreement that Recommended Codes of Hygienic Practice for food processing factories should be implemented at the national level. With the existing or strengthened infrastructure for food control, it should be ensured that the health of the consumer is protected against microbial contamination of food.

12. One main drawback to acceptance of Codex standards is seen in cases where some Codex standards have been accepted by the developing countries but the same have not, been accepted by importing (developed) countries. This causes two problems.

- (a) Developing countries are finding it difficult to export these products strictly conforming to Codex standards as certain importing countries can cut prices by 'importing some food products from other competing exporting countries by compromising in quality requirements such as grading, trimmings and other

minor deviations without affecting the hygiene requirements of the finished product.

- (b) Acceptance of Codex standards for a particular product at the national level implies that the product must conform to the laid down standard and, a sub-standard product produced lower than the laid down national standard is liable to be penalized in the country by the national food control authority.
13. There was a general consensus amongst the visited countries that Codex standards may be implemented in two steps, i.e.
- (a) The hygiene requirements laid down in Codex standards be adopted for acceptance by all member countries to protect the consumer from any health hazard.
 - (b) The quality requirements under Codex standards mainly of an aesthetic nature, regarding length and breadth of individual styles of product, type of pack, packing medium, definition of defects which are subjective in much fine detail and cannot be quantitatively measured by standard analytical methods, are not always necessary, and, if at all required, may be made optional subject to mutual acceptance by importer/exporter. In certain developing countries, they have not acquired the imported machinery to conform to certain specified sizes of the product as laid down in the Codex standards, but have to depend only upon available manual labour very often as a socio-economic measure to reduce the level of unemployment. At the same time, to achieve quality with regard to aesthetic aspects, the necessary transfer of technology to improve the quality levels of finished products may be made possible through support from international agencies, such as FAO, in gradual stages. '
14. As per existing practice in Codex standards, under "Hygiene and Handling, Requirements", it has been generally stipulated that:
- (a) the product shall not contain any pathogenic microorganisms and;
 - (b) shall not contain any substances originating from microorganisms in amounts which may represent a hazard to health.

It was the unanimous opinion of the visited countries that there was a need to lay down quantitative requirements in this regard, taking into account the available data with the national exporting authorities of developing countries. These requirements should be such that they are within the exporting countries means of achievement under existing conditions.

15. Bearing in mind the increased intake of cereals in developing countries, the maximum limits for pesticide residues in Indian Food Laws have been prescribed at 50% of the level recommended by Codex standards. At present there is limited information available on the level-of intake of contaminants in daily items of foods consumed in developing countries. Monitoring of food as well as basket surveys are being undertaken and data may be available within the next 2-3 years to enable developing countries to offer their considered comments on the subject.

16. The problem of meeting the tin content requirement in some Codex standards for canned fruit juices and canned fruits and vegetables was highlighted by the developing countries. It was pointed out that:

- (a) open top sanitary tin plate for processing food products is imported from developed countries ;

- (b) tropical climatic conditions prevalent during processing, storage of finished products before consumption under varying climatic conditions in the. developing countries have a bearing on the final leaching in the finished product.
- (c) there is so far no toxicological evidence to indicate the toxicity of tin. at the existing temporarily endorsed limit of 250 mg/kg.
- (d) storage studies data on tin pick-up in processed foods are under compilation in India for presentation at the forthcoming Manila meeting. The general consensus was to keep the tin content level at 250 mg/kg and in the meanwhile to make attempts to improve the existing processing techniques in developing countries by:
 - transfer of appropriate technology at a regional level through utilizing the available expertise in the region;
 - laying down international standards for OTS tin plate and suitable lacquer to reduce the intake of metallic contaminants, especially tin and lead in processed foods.

17. The packaging cost of processed foods in developing countries (mainly dependent upon imports from developed countries) is on the increase each year. In spite of this, developing countries are finding it difficult to procure the right quality of tin plate for various reasons and these countries - again for various reasons - are not 'always able to obtain first quality tin plate and have to live with second quality tin plate. This has caused some of the canneries to close down, being unable to meet the competitive prices in the world markets.

18. There was a unanimous opinion that countries of the Asian Region should get together in developing OTS tin plate and other cheaper packaging material, from their own resources so as to meet their own requirements and be able to compete in international markets for the sale of their canned products. From the initial available information gathered from the visited countries, it is understood that pooling of resources in the form of available black plate, tin and coating of tin plate facilities existing in individual countries is practicable. This will call for the appropriate participation of packaging experts from developing countries within the Asian Region and would enable them in the long run to meet the packaging material requirements for their vast available agriculture products at competitive prices.

19. The Codex Contact Points in developing countries need to be strengthened: FAO Representatives in each country can play a role. Some of the developing countries are not very much aware of the significance of Codex standards and advantages accruing there from in international trade as well as in improving the quality of food products.

20. Invitations to attend meetings of Codex Committees should be pursued through further follow-up by FAO Representatives at the appropriate level.

21. Meetings should be held in the Region to achieve the maximum attendance from developing countries.

22. The use of food additives especially coal tar colours and flavours should be restricted/discouraged as, far as practicable to enable:

- (a) developing countries to process natural products in their natural form as far as possible without lowering their nutritive value;

- (b) consumers to safeguard their interests and prevent the consumption of sub-standard products otherwise appearing attractive, through use of artificial colouring and flavouring agents;
- (c) improvement of nutritional standards.

23. International standards for tropical fruit cocktail should be developed to enable the utilization of tropical fruits like papaya, water, melon rambutan, banana, mango, guava, in addition to existing fruits laid down in fruit cocktail standards. The requirements of Various percentages of permitted fruits may be laid down as a guideline under quality requirements, subject to agreement between the importer and exporter. It was stated that the word 'salad' has a different connotation.

24. Recommended Codex standards should be reviewed periodically, after an interval of five years, based on practical experience gained by all member countries in implementing these' standards.

25. All the visited countries gave very high priority to FAO activities concerning strengthening food control services, training of personnel, and utilization of national institutes and experts from within the Region. It was pointed out that while it was easy to prepare or accept a standard, it served no purpose until and unless it was possible to enforce it with appropriate food control infrastructure which is lacking in most of the. developing countries.

Specific Observations Outlined by National Food Legislative and Inspection Authorities and Food Industries in the Countries Visited

THAILAND (25-31 January 1979)

26. Visit to the Thai Industrial Standards Institute. Ministry of Industry. From the discussions with Mr. Chaiwai Sangruji, the Director, the following points emerged. Technical Committees are constituted to cover each standard selected for drafting and at present there are 130 Technical Committees. Out of the 47 food standards developed at, the. national level, the 9 standards listed below are based on Codex standards:

- (1) Standards for Edible Fats and Oils
- (2) Standard for-Frozen Shrimps and Prawns
- (3) Standard for Canned Pineapple Juice
- (4) Standard for Canned Asparagus
- (5) Standard for Canned Tuna
- (6) Standard for Canned Tomatoes
- (7) Standard for, Canned Shrimps and Prawns
- (8) Standard for Canned Sardines
- (9) Standard for Canned Pineapple

The Thai Standards Institute checks the quality of the processed food products by utilizing the analytical facilities of the Government Laboratory of the Ministry of Public Health.

27. Compliance with the standard for canned pineapple, exports of which amount to 50 million US dollars at present, is mandatory. Acceptance has been given to the Codex standard for canned pineapple. However, exports of canned pineapple are being affected adversely, as certain importing developed countries which have not accepted Codex standards are importing canned pineapple not conforming to Codex standards. In order to encourage developing countries to convey their acceptance of Codex

standards, it is imperative that developed countries importing processed foods from developing' countries should accept Codex standards.

28. Visit to the Ministry of Industry - Codex Contact-Point

The consultant met Mr. Paprit Ha Nagara, Director-General, Department of Science, and Ms. S. Gongsakdi, Secretary, National Codex Alimentarius Committee. During discussions, it was pointed out that about seven years ago a Committee was established, with representatives from the Ministries of Agriculture, Health, Industry and Commerce, to evaluate and adopt Codex standards for various commodities. Recently, a separate division has been authorized by the Government to examine and adopt Codex standards as far as practicable. At the same time, it was pointed out that the following specific issues in accepting Codex standards need to be examined:

- (1) The maximum limits for pesticide residues are mainly based on data made available by the developed countries. Until such time as data are available from developing countries, by introducing monitoring programmes, it is not practicable for developing countries to accept these maximum limits.
- (2) Developed importing countries should be advised to accept Codex standards to enable developing countries to export food products conforming to Codex standards against competition from exporting countries which have not accepted Codex standards and are in a position to compromise in quality and price.
- (3) Specifications for canned sardines and sardine-type products do not include the species "Sardinella Longiceps" and SIRM, although approved by FAO to be called sardines.
- (4) Defect tables in certain Codex standards, such as those for Quick Frozen Shrimps and Prawns and Canned Prawns are too strict and unrealistic for implementation and need to be simplified.
- (5) Food Law enforcement machinery needs to be strengthened with regard to food inspection and quality control infrastructure to enable the implementation of accepted national food standards drawn up to protect local consumers from any health hazard, as well as to meet international commitments for exports according to Codex Standards.
- (6) Codex specifications for sweetened condensed milk -. the words "Unfit for infants" should be mentioned on the label.
- (7) The limit of 250 mg/kg for tin in canned products should be maintained in the absence of any toxicological evidence and in view of the climatic limitations prevailing in tropical countries during processing and storage by the food processing industry. Data from studies on storage with regard to tin content in canned food are being collated and will be available in a year's time.

29. Visit to the Ministry of Public Health

The Consultant met (1) Mr. Pora Tamprateep, Deputy Secretary-General, Food and Drug Administration; and (2) Mr. Theera Satasuck, Director, Food Control Division, Food and Drug Administration. About 26 food standards have been finalized by utilizing the references available from Codex, US-FDA/U.K./German and Australian food standards. A sub-committee consisting of representatives from the Department of Medical Science, Ministry of Industry and Agriculture, and the University is responsible for finalizing standards. The enforcement machinery for implementing food laws needs to be strengthened, as there is a shortage of trained food inspectors and trained food analysts.

With regard to acceptance of Codex standards, it was suggested that target acceptance be indicated by all member countries to enable the enforcement of Codex standards side by side with the strengthening of the necessary infrastructure to implement quality control at the national level. Due to non-receipt of invitations, it was not possible for their representative to attend Codex meetings for which budget commitments cannot be made in advance.

30. Visit to the Institute of Food Research and Product Development, Kasetsart University, Bangkok

The Consultant met (1) Prof. Amara Bhumiratana, Director, and (2) Dr. Sulhon Nimmannitaya, Food Technologist. The main points of discussion are given below:

(1) Thailand has given full acceptance to the Codex standard for canned pineapple and this standard is mandatory under their national food laws, but certain developed countries which are importing canned pineapple have not conveyed their acceptance of the Codex standard. This has resulted in unfair competition from exporting countries which have not accepted the Codex standard for canned pineapple as they are in a position to compromise on quality requirements regarding grading, trimming, and cores/eyes not properly removed so long as the price is reasonable. To enable the acceptance of Codex standards by exporting (developing) countries there is a need to advise that:

- (a) buyers. (importing countries) must accept. international codex standards;
- (b) effective enforcement machinery (with special emphasis on food inspection and quality control infrastructure) at the national level be developed to ensure the implementation of accepted national/international food standards. thereby protecting the average consumer from health hazards and substandard products.

(2) OTS Tin Plate Canneries

At present, black iron plate is imported and electrolytically coated with tin in Thailand. The cost of imported black iron plate is gradually rising every six months, with the result that it is becoming difficult for developing countries to process the raw agricultural products at competitive prices in the international market. Prof. Amara Bhumiritana was of the opinion that developing countries must, pool their resources to manufacture OTS tin plate to meet their requirements for the canneries, without depending upon imports from developed countries which were getting gradually more costly. This needs the transfer of available know how and technical expertise of packaging experts within the Region and regional institutes under UNIDO's transfer of technology programme..

(3) Tin Content in Canned Products.

The existing maximum specified limit of 250 mg/kg should be maintained in the absence of any toxicological evidence against it and in view of tropical climatic conditions of manufacture and storage of canned foods in developing countries. The tin container, including other packaging materials which will safeguard the hygienic and other qualities of the food, should be codified by laying down appropriate Codex standards so as to avoid complaints of rusting and increased leaching of contaminants in processed foods during processing and storage under tropical conditions in developing countries.

Through the kind assistance of Prof. Amara Bhumiritana, it was possible to visit one of Thailand's largest Thai-owned pineapple canneries, SIAM Food, at very short notice. The cannery began production in late 1972 and today its capacity of 2.5 million cases per year includes 300,000 gallons of concentrated fruit juice. SIAM Food has always aimed at production for export and its domestic production is only one percent of the total production. To maintain top quality control and hygiene requirements, the quality control laboratory is staffed by 50 qualified laboratory technicians, some of whom are trained in Australia to study the latest pineapple canning technology. Hygiene and high standards of cleanliness are observed all through the packing operations, with all workers in clean white overalls and caps. In addition, research work is being carried out on the possibility of canning protein food substitutes such as soya bean milk.

MALAYSIA (1-6

February 1979)

31. Visit-to Food Quality Control Unit at the Ministry of Health

The Consultant met (1) Dr. H.J. Wan Mahmud B. Othman, Assistant Director of Health, Food Quality Control Unit. (2) Dr. Aziz Harrison, Medical Officer of Health, Food Quality Control Unit, and (3) Ms. Norani Sudin, Food Technologist. The main food items of export from Malaysia were indicated as (i) palm oil, (ii) canned pineapple, (iii) frozen cooked prawns, (iv) pepper, (v) meat and its products. The Codex Contact Point is the Standard and Industrial Research Institute (SIRIM), "There are shortages of technical personnel to examine critically the Recommended Codex Standards to convey government recommendations on their acceptance. However, whenever new food standards are formulated or are under formulation, Codex standards are generally used as a reference standard in their final adoption-in national food regulations.

A tropical fruit cocktail standard based on tropical fruits like papaya, water melon, rambutan, banana, pineapple, litchis, guava and melon needs to be developed to utilize available' raw material in developing countries.

Cooked peeled frozen prawns A quality certificate is being issued for cooked prawns/shrimps intended for export to the U.S.A., U.K., Japan and EEC countries. The following microbiological standards for the exportation of frozen prawns/shrimps have been laid down:

- (a) Bacterial count up to 250,000 organisms/gramme
- (b) Salmonella absent in 50 grammes
- (c) Staphylococcus aureus under 1,000/gramme
- (d) E. Coli less than 10/gramme

At present, in the Codex standards for cooked peeled frozen shrimps or prawns there are no microbiological limits laid down but instead, para 5.4 under Hygiene and Handling reads as below:

"When tested by appropriate methods of sampling and examination, the heat treated product:

- (a) shall not contain any pathogenic organisms, and
- (b) shall not contain any substances originating from the microorganisms in amounts which may, represent a hazard to health".

In the absence of any internationally accepted microbial limits, there have been occasions when rejection of exported stocks has taken place in the importing country for

not meeting the laid down microbial limits of their national standard. It was emphasized that reasonable microbial Units' based on the data available from developing countries should be indicated under Hygiene and Handling Requirements of Codex standards.

32. Visit to the Agricultural Research and Development Institute

The Consultant met (1) Dr. Ahmed Zaharudin Bin Idrus, Head, Agricultural Product Utilization Division (APU) and (2) Ms. Chia Joo Suan, Officer-in-Charge, Chemical Analysis Laboratory, Quality Control Section. The Institute has a well-equipped chemical and microbiological analytical laboratory. The microbiological analysis of frozen prawns/ shrimps is being carried out. One of the analytical scientists from the laboratory is attending the second F.C.A. Course at Mysore ending 17 March 1979. They are undertaking monitoring of contaminants in various types of foods to: collect the relevant data under a national monitoring programme.

33. Visit to the Ministry of Agriculture

The Consultant met Dr. s. Thurai Singhan, Director General of Veterinary Services. Malaysia is exporting cured ham, meat and bacon products to Japan and EEC countries. The health of animals reared for slaughtering is good and free from foot and mouth disease. The need for laying down microbial limits for meat products was highlighted, as discussed earlier on the subject of laying down similar limits for frozen prawns/ shrimps. Different microbial standards are laid down by importing countries which vary from time to time based on trade factors such as price, time of procurement, availability and other requirements. Internationally accepted microbial limits in Codex standards will assist in solving international disputes. Dr. Thurai Singhan promised to forward the microbial limits laid down for exporting meat' products at the national level for examination by Codex Expert Committees on the subject, as the same was not readily available.

34. Dr. A. Balasubramanian, Secretary, Pesticide Board

The Pesticide Act, 1974, has been enforced in Malaysia to control the importation and manufacture of pesticides by registration and permit before the same can be used in the country. At present no work is being done to monitor pesticide residues in food and therefore no comments can be offered on Codex standards laying down maximum limits for pesticide residues. A Federal Republic of Germany Agency for technical cooperation is planning to provide aid to develop the pesticide laboratory by way of equipment, training of analysts and lending experts in the next five years.

35. Visit to standards and Industrial Research Institute. Malaysia. Ministry of Science Technology and Environment.

The Consultant met (1) Dr. Abdullah Din Mohamed Yusuf, Controller, (2) Mr. Lim Ho. Pheng, Director, and (3) Mr. Robert D. Pereira, Head, Industrial Liaison. There are 185 technical committees constituted for preparing and formulating national standards. The SIRIM quality mark on seven items of food, such as condensed milk,- butter, tea., sugar, flour, monosodium glutamate and, wheat flour is issued under SIRIM's certification, marking scheme. At present canned pineapple is produced in three grades called fancy, choice and standard type. However, the main difficulty in conveying acceptance of Codex standards is with regard to non-acceptance of these standards by importing developed countries. This issue has been highlighted earlier by the Representative from Thailand. It was pointed out during discussions that :

- (a) National standards are generally based on Codex standards;

- (b) Codes of hygienic and/or technological practice are good guidelines and generally acceptable;
- (c) separate Codex standards for tropical fruit cocktail should be prepared to include fruits from tropical countries, like papaya, water melon, rambutan, melon and bananas, being available in plenty;
- (d) the tin content as a contaminant in processed food should be retained at 250 mg/kg in the absence of any evidence of toxicological hazard;
- (e) no compromise on health safety and nutritional requirement is acceptable but quality parameters can be graded like fancy, choice and standard grades of canned pineapple as practiced in Malaysia. as certain importing countries are agreeable to compromise on quality at reduced price. Graded quality will prevent wastage of raw materials up to 40% to prepare fancy (Codex) grade of canned pineapple;
- (f) more emphasis should be laid' on available Codex methods of analysis to be followed 'by all member countries so that such referee methods are available to settle international disputes.

36. Visit to the Ministry of Primary Industries

The Consultant met	(1) Mr. Anha Buang (2) Mr. Annas Khatib Jafar (3) Mr. Hasim Hassan (4) Mr. Hassan Ismail (5) Mr. MG Hong Chai, Malaysian Pineapple Industries Board	Ministry of Primary Industries
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The Malaysian pineapple industries board, a semi-governmental organization, is responsible for providing pineapple to canneries which export about 30 million US \$ of canned pineapple. There are four big pineapple canneries:

- (a) Malaysian Pineapple Cannaries
- (b) Pineapple Canneries of Malaysia (largest government cannery)
- (c) Lee Pineapple Cannery
- (d) Lam Hoat Kupkee Cannery

The main role of the Malaysian pineapple industries board is to regulate the quality, grading, supply of fruit, production and marketing of the finished product. During discussion, it was brought out that the following stipulations under the Codex standard for canned pineapple are not realistic and practicable from the Malaysian industries point of view.

Para 1.3.6 Spears or fingers - Long, slender pieces cut radially and lengthwise of the cored pineapple cylinder, predominatly from 65 mm or longer. The prescribed national standard laid down 58 mm of longer as per existing practice.

Para 1.3.9 Dried or cubes - reasonably uniform, cube shaped pieces, predominantly 14 mm or less in the longest edge dimension. The national standard prescribes 19.08 to 25.4 mm based on the existing available machinery in the country.

Para 2.2.1.3 Excessive trim - regarding spiral slices - trim will 'be considered "excessive" if the portion trimmed away exceeds 5% of the apparent physical bulk of the perfectly formed unit. This is a very subjective check, as it is rather difficult to calculate the physical bulk of the perfectly formed unit In actual

practice nearly 15% of the trimming takes place to produce spiral slices instead of 5% laid down in the Codex standards

Para 2.2.5. Uniformity of size and shape - the Malaysian standards provide by dimensions and not by weight as laid down in the Codex standard.

Para 3. Food Additives - Use of natural fruit essences, mint flavour and anti-foaming agents should be restricted as they could disguise a substandard product and make it acceptable, which is contrary to the consumer's interests.

From the above-mentioned stipulations provided in the Codex standard for pineapple, it was emphasized that the foremost aim of Codex international standards should be to protect the consumer from any health hazard. As such it will be desirable that hygiene requirements be accepted by all countries, whereas the quality requirements laid down in Codex standards should be made voluntary for a period of 3-5 years till such time as industry in developing countries is able to come up to meet the laid down quality requirements. In the meantime, Codex standards which have been in existence for over 5 years should be re-examined in the light of the active interest shown by developing countries.

The tin content in processed food products should be maintained at 250 mg/kg in the absence of any toxicological evidence and; high storage temperature of processed products in tropical countries.

37. Visit to the Federation of Malaysian Manufacturers, Kuala Lumpur

The Consultant; met Mr. Lim Chong Keat, Deputy Director. The total export of frozen prawns had touched 80 to 90 million US \$ from 12 million US \$ in earlier years but due to glut and heavy rejections, it fell down in 1974-75. The main export of frozen prawns is to Japan, EEC Countries, Western Europe. U.S.A. and the Middle East. Certain countries demand grading in size but others are not particular about grading but reject on high bacterial count. In the absence of any limit of bacterial count in Codex standards, they have to follow national bacteriological limits laid down by the Ministry of Health as indicated earlier before allowing the export of cooked frozen prawns. The need for laying down microbiological limits under the hygiene requirements for Codex standards wherever these are not indicated was brought out on the basis of Malaysian standards, especially for cooked frozen prawns to solve international disputes.

Palm oil. The export of palm oil is carried out under the Palm Oil Registration and Licensing Authority (PORA) which came into existence only last year. A Palm Oil Research and Development Authority of Malaysia has also been set up. A cess of one million dollars per metric tons on production of palm oil is levied to regulate and upgrade the industry.

INDONESIA (7-12 February 1979)

38. Visit to the Ministry of Health.

The Consultant met (1) Dr. A. Heman, Director, Food Control, Directorate General for Food and Drugs Control, and (2) Dr. Simatu Pang, Microbiologist, Food Control Laboratory. During discussions, it was pointed out that since 1974 an Indonesian Food Codex Committee has been constituted to formulate national food standards. It is an APEX body which consists of technical representatives from the Ministries of Health, Industry, and Agriculture, provincial universities, the Bogor Institute of Agriculture and the National Atomic Energy Commission, There are eight sub-committees dealing with:

- | | |
|---------------------|--------------------------------------|
| (i) Terminology | (v) Hygiene and Microbiology |
| (ii) Technology | (vi) Chemistry and physico-chemistry |
| (iii) Composition | (vii) Packaging and storage, and |
| (iv) Food Additives | (viii) Labelling. |

357 food additive standards have been finalized based on Codex standards and are likely to be enforced by April 1979. 29 food commodity standards are under various stages of preparation and drafting as per the following procedure followed for formulating standards:

The Food Codex Committee lays down the programme for drafting food standards:

- Step I - Collection of data from (a) literature, and (b) field survey and laboratory examination. Thereafter proposed standard is prepared and sent for comments to the Food Codex /Committee member.
- Step II - Proposed standards with comments are examined and are thereafter termed proposed concept standards.
- Step III - Proposed concept standards are sent to manufacturers and consumers' organizations for comments before finalization for enforcement as a national standard.

At present, the following eight standards are under Step III;

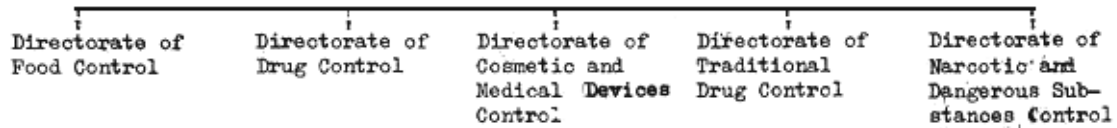
- (1) Canned Sardines
- (2) Powdered Milk
- (3) Evaporated Milk.
- (4) Sweetened condensed milk
- (5) Powdered skimmed milk
- (6) Skimmed sweetened condensed milk
- (7) Evaporated skimmed milk
- (8) Baby foods.

Food Control Legislation is based on:

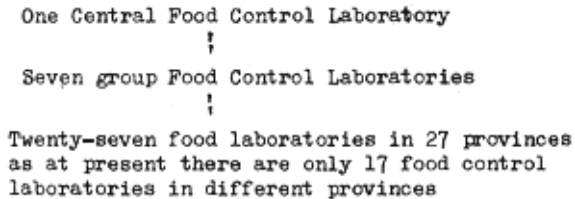
- (1) Basic health law 1960
- (2) Commodities law 1961
- (3) Hygiene of public enterprise law 1962
- (4) Hygiene law 1962

The Directorate General of Pharmacy was reorganized and a Directorate of food Control Was started during April 1975. The reorganized structure, is as follows:

Directorate General of Drug and Food Control



At present, there is only one central food control laboratory at Jakarta which is working jointly with the central drug control laboratory. There is a proposal to create separate food control laboratories on the following pattern:



There is a proposal under examination to constitute an Apex body called the National Standardization System where representatives from the Ministries of Trade, Industry, Health and Agriculture will be co-opted as members.

At present, the Ministry of Trade regulates the import and export of food products, whereas the Ministry of Health is the enforcement authority of national health laws in the country.

It was stated by Dr. Heman that the maximum use of Codex standards is being made as references in laying down specifications on food additives, sampling procedures and methods of analysis (depending upon availability of sophisticated equipment).

However, government policy regarding the notification of acceptance, target acceptance or acceptance with specified deviations of Codex standards has not been formulated, as most of the national food standards are still in the process of finalization as indicated in earlier paragraphs.

There is a shortage of technical staff to enforce national standards which need strengthening by adequate training at the national and international levels.

During discussions, it was pointed out that the invitation to attend the Manila meeting of the Coordinating Committee for Asia from 20-26 March 1979 had not reached the Codex Contact Point by 9 February 1979. Action was taken to send a formal invitation from the FAO Representative in Indonesia along with a copy of the agenda to enable timely attendance of an Indonesian delegation.

39. Visit to Ministry of Industry - Directorate General Multifarious Industries

The Consultant met Mr. J.F. Wattimena, Director for Planning and Programming. It was brought out that they were not aware of Codex Food Standards but showed a keen interest in acquiring them as their Ministry is responsible for regulating all types of industries, including food processing. They were advised to contact the Codex Contact Point, Ministry of Agriculture, as well as the FAO Representative in Jakarta for getting Codex food standards of interest to them.

40. Visit to Department of Trade - Directorate General of Foreign Trade

The Consultant met (1) Dr. N.A. Koescoe-Moredjo, Director for Standardization and Quality Control and (2) Dr. I.R. Ny Y. Darmawan. The Department, is responsible for formulating standards for various commodities such as rubber-tin and food products. At present, the export of frozen shrimps, frozen frog legs, palm oil, canned fish, meat and

green coffee beans, mushrooms is carried out to the U.S.A., Japan and in small quantities to France and Italy. An export "quality check is exercised on green coffee beans.

There are eight quality control laboratories for fisheries, out of which seven are regional laboratories and one central control laboratory.

It was brought out in the discussion that there is insufficient transmission of information on Codex standards from the Codex Contact Point to the Department of, Industry and Trade, presumably due to the lack of sufficient available staff in the Ministry of Agriculture.

This needs appropriate remedial measures by strengthening of the Codex Contact Point at the national level as well as making effective use of the FAO Representative in Indonesia, an office which has only recently been created as a separate entity.

PHILIPPINES (12-17 February 1979)

41. Visit to the Ministry of Health

The Consultant met (1) Mr. Arsenio M. Regala, Administrator, Food and Drug Administration; (2) Ms. Catalina C. Sanchez, Deputy Administrator, Food and Drug Administration; (3) Ms. Maria G. Yap, Chief Food Section, F.D.A. Laboratory; (4) Ms. Cecilia L. Gomez, Chief Research Bacteriologist, F.D.A. Laboratory; (5.) Mr. Iluminado F. Reyno, Chief Food inspector, F.D.A. Laboratory,

Diagrammatic sketch of Food and Drug Administration is given in Annex.

There are four main divisions, namely:

- (i) inspection and Licensing Division
- (ii) Laboratory Division
- (iii) Narcotic Drugs Division
- (iv) Administrative Division

Food Inspectors

For inspection, there are 14 food inspectors working under one Chief Food Inspector for visiting processing factories and markets for drawing food and drug samples. Two to three samples of food can be drawn per day. The basic qualification for food inspectors are graduate in science with degree in food chemistry, pharmaceutical and food technology, as they are also responsible for drawing drug samples. These inspectors are trained under local arrangements.

Laboratory Division

Approximately 2,000 food samples are examined annually. Export samples are brought by the exporters themselves for examination in the central laboratory and analytical report is given on payment of laid down analysis fee. Regarding inspection of local food samples, these are brought by food inspectors for examination.

In cases where samples are found to be not conforming to national standards, the analytical report is referred to the legal section. A notice is issued to the defaulter for hearing by the legal advisor. Based on the legal advice, the case is finally decided by the Administrator, F.D.A., as to whether it is a fit case for launching prosecution or whether issue of a warning will suffice in the first instance.

In addition, there are 12 regional laboratories under regional health directors in different provinces. However, the regional laboratories are only equipped to deal with routine analysis of food samples.

National Food Standards

Fifty national food standards have been finalized based on Codex standards and are duly enforced. In cases where national standards are not available, US F.D.A. standards are made applicable.

Date Marking of; Prepackaged Foods

Recently an administrative order has been issued under which certain selected processed foods will carry a "Consume before" date and specific storage instructions effective December 1979.

The "Consume before" date is the period after which the quality of the product or any specification (microbiological quality, nutritional value, physico-chemical and organoleptic properties) which the food tacitly or expressly claims to possess is significantly impaired.

Microbiological Standards for Frozen fish

It was stated that samples of frozen fish are examined for bacteriological examination before their export. The parameters laid down for all types of *frozen* fish are as hereunder:

- (a) Total count per gramme - not to exceed 100,000
- (b) Coliform organisms per gramme - not to exceed 100
- (c) Free from pathogenic organisms

During discussion, it was brought out that there is a need to lay down amounts in quantitative requirements of organisms under hygiene clause in Codex standards which may represent a health hazard bearing in mind the compatibility of exporting (developing) countries. This issue has been brought out earlier by Malaysian and Indonesian experts during my visit to those countries.

In addition it was felt that Codex standards be implemented in two steps, i.e.

- (a) hygiene requirements laid down in Codex standards be adopted for acceptance by all member countries to protect the consumer from any health hazard;
- (b) quality requirements mainly of aesthetic nature regarding size and shape, type of pack, packing medium, definition of subjective defects may be made optional subject to mutual acceptance by the importer and exporter.

The addition of food additives should also be reviewed and be restricted bearing in mind the low nutritional standards prevailing in the developing countries.

Food Control Services

FAO activities concerning strengthening food control services, training of personnel and utilization of national institutes and experts from within the Region be intensified so as to enable enforcement of national and international-standards by the developing countries.

Tropical Fruit Cocktail

National standards for tropical fruit cocktail on the format of Codex standards for fruit cocktail are under preparation wherein fruit ingredients like bananas, papaya, water melon and melon, etc. are being included to utilize these tropical fruits. It was brought out that terminology of the term "Fruit Salad" is quite distinct from cocktail.

Codex Contact Point

Needs to be strengthened at national level by requesting developing countries to make use of advantages accruing there from in international trade as well as improving the quality of food products at national level.

42. Visit to Department of Agriculture

The Consultant met: (1) Dr. S. Salvadore Escudero, Director and Chairman, National Meat Inspection Commission; (2) Dr. Prudencio L. Tamayo, Assistant Executive Director, and (3) Dr. Josefino Froyalde-Rialde, Chief of Regulations and Control Division, Bureau of Animal Industry.

It was agreed that hygienic requirements, codes of hygienic and/or technological practices laid down under Codex standards are useful references and guidelines for acceptance by all member countries.

The Model Food Law and enforcement machinery capable of ensuring quality checks, need to be strengthened by appropriate training of food inspectors and food analysts, to be pursued under international and national level in developing countries.

43. Visit to Industries

The Consultant met: (1) Mr. Carlos Villa-Abrille, Executive Vice-President, Amalgamated Creameries Manufacturing Corporation and President Philippines Chamber of Food Manufacturers, Manila; (2) Mr. Vicente H. Lim Jr., Philippines Packing Corporation, Manila (Del Monte); (3) Mr. Atty Sanson B. Turingan, Assistant Corporate Secretary (Del Monte); (4) Mr. Patrick O Ng, Division Manager, Universal Robena Corporation, Manila; (5) Mr. Mark H. Gosgriff, Technical Consultant Universal Robena Corporation, Manila.

Del Monte Cannery is utilizing about 300,000 tons of raw material yearly in producing pineapple and its products. An area of 10,000 hectares is being utilized for raw materials. Canned pineapple, frozen pineapple, concentrate juice is exported according to Codex standards. They were of the opinion that quality requirements regarding size, type of pack, need not be mentioned in Codex standards but left to importer and exporter of a particular product. Regarding tin content in canned product especially of acidic nature it should be maintained at 250 mg/kg for reasons already enumerated in earlier paragraphs.

C.F.C. Corporation are manufacturers of coffee, chocolate products, biscuits, ice cream, non-dairy creams, cocoa butter and chocolate products which are exported according to international Codex standards. The Philippines Government have already indicated their willingness to accept these standards after their national standards on these products are finalized for implementation.

Tin Content

Quality of tin plate available has been responsible for many technical problems in that it is not free from pin-holes, improper electrolytic tin coating and resulting in rust spots in finished products. The increasing packaging cost of tin plate has resulted in closure of some canneries at present.

44. Visit to Food and Nutrition Research Institute - National Science Development Board

The consultant met: (1) Ms. Benigna V. Roxae, Senior Research Supervisor, (2) Ms. Loreto M. Duma-Dang, Food Contaminant Section. The Institute has a Section on Microbiology working on monitoring of aflatoxin in rice, maize, and other cereals. Monitoring of heavy metals like mercury in fish is being carried out and has been reported within the existing limit of 0.05 mg/kg of mercury. Ms. Loreto M. Duma-Dang, a trainee from 1st F.C.A. course of Central Food technological Research Institute is doing monitoring work on food contaminants on cereals including corn.

(A) Industrial Research Centre - National Institute of Science and Technology

The Consultant met: (1) Ms. Olympia N. Gonzales, Officer-in-charge, Industrial Research Centre and (2) Ms. Mercedes R. Soriano, Officer-in-charge, Food Technology Research Division. The work on utilization of fresh fruit and vegetables using drying techniques is being carried out especially with mangoes.

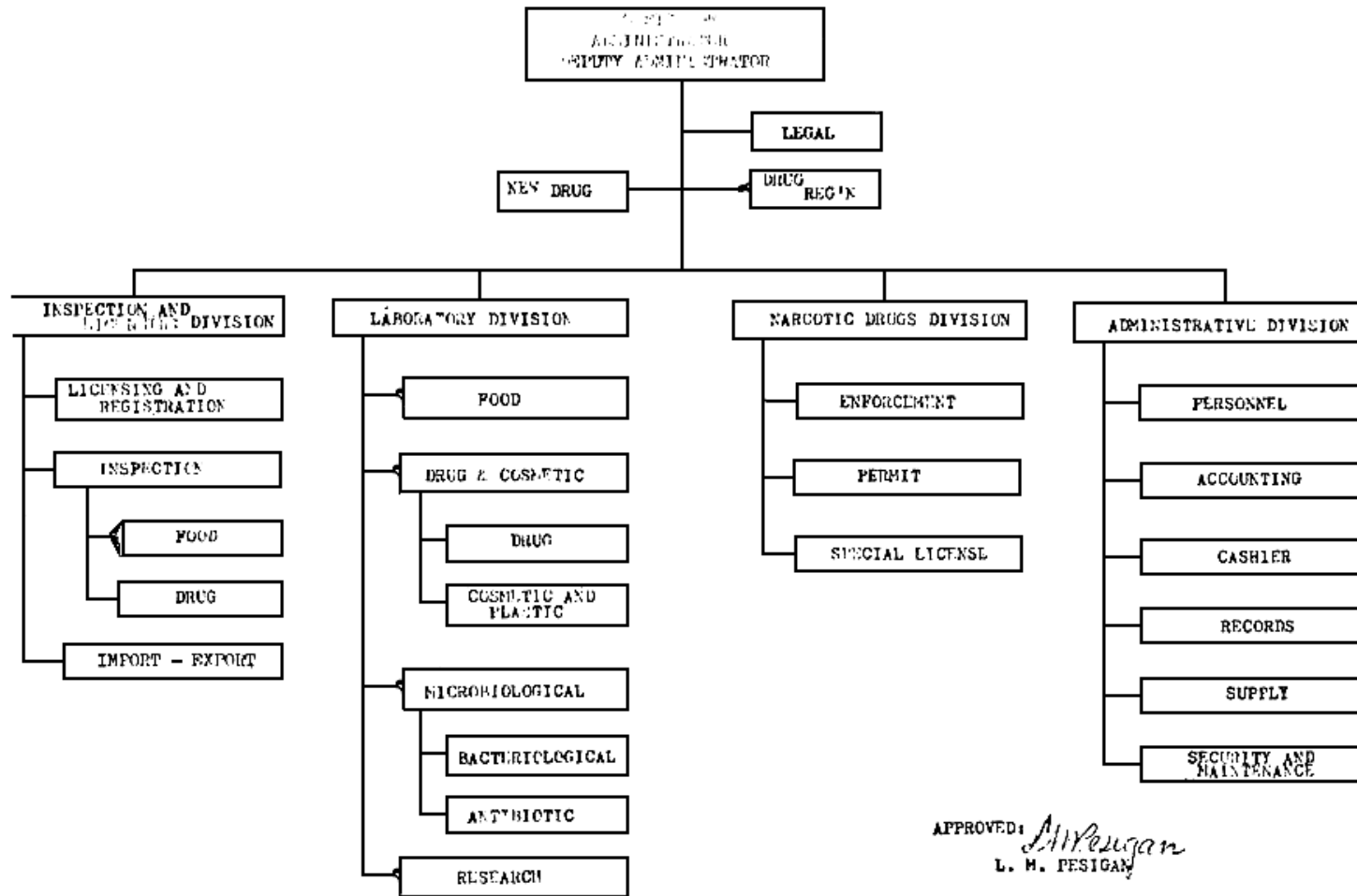
45. Visit to Bureau of Plant Industry, Manila

The Consultant met: (1) Ms. T. Alvarez-Antazo, Officer-in-charge, Pesticide Residue Laboratory; (2) Dr. Thomas Wireland, Consultant, Pesticide Residue Project (Frankfurt). It is a well equipped laboratory with latest equipment to carry out monitoring programme in pesticide residues in collaboration with the Federal German Government consultancy programme.

Fresh meat, vegetable oils, including coconut oil, fresh fish, tobacco, rice and mothers' milk has been monitored for pesticide residue and the analytical data is under statistical evaluation.

About 1,000 samples each year are examined which are received from 10 zonal stations situated throughout the country for pesticide residues evaluation. It was pointed out that about 6,000 tonnes of pesticides is used in a total population of 45 million people in Philippines which is quite low when compared to developed countries. However, fresh vegetables have shown excessive amount of insecticide residues beyond tolerance limit. Accordingly farmers are being advised to follow good agricultural practice regarding limited use of insecticides in fields. It was brought out by Federal German Government consultant that collaboration programme for monitoring of pesticide residues has been undertaken with 14 countries so far.

ANNEX



APPROVED: *L. M. FESIGAN*
L. M. FESIGAN

INDIA (18-24 February 1979)

46. Visit to the Ministry of Health

The Consultant met: (1) Mr. T.V. Antony, Joint Secretary; (2) Dr. Ranjitsen, Deputy Director General; (3) Mr. D.S. Chadha, Assistant Director General, Health Services and Liaison Officer, National Codex (Food Products' Standards) Committee; (4) Ms. Debi Mukerjee; Assistant Secretary, Central Committee for Food Standards.

During discussion it was pointed out that:

(a) A national Codex (Food Products Standards) Committee, under the chairmanship of Mr. R.C. Sud, Additional Secretary to the Government of India, with technical experts, has been established to examine Codex food standards for comments and implementation. This is a high-powered Committee consisting of 14 experts from the various fields of Dairy Plant Protection Adviser, Animal Husbandry, Fisheries, Oils and Fats, Agriculture Marketing Adviser, I.S.A., Processed Food Export Promotion Council and Food and Nutrition Board, Department of Food.

Sardine Species

(b) The non-inclusion of the species of Sardine Longiceps which falls within the scope of the Indian national standard but is not included in the Codex standard for sardines, fresh and canned. This point was previously made by Thailand, i.e. that Sardinella "SIM" has not been included in the standards.

Codex Fats and, Oils Standards

(c) These are generally acceptable except for the addition of colours and flavours which mask the poor quality of the product.

Pesticide Residues

(d) The limits are generally accepted in national standards except in respect of fruit and vegetable products. In the case of cereals, the limits laid down under Codex standards have been prescribed at 50 percent because of the high intake and consumption in India. However, more data on pesticide residues is likely to be collated by carrying out a monitoring programme in four regional central food laboratories.

Codes of hygienic practice

(e) They are being formulated on the guidelines issued by Codex.

Tropical Fruit Cocktail

(f) Standard to be prepared on the basis of data to be provided by the Philippines. Tin

Content of Processed Foods

(g). A technical paper on the subject will be presented by the Indian delegation to the Manila meeting.

47. Visit to the Ministry of Agriculture and Irrigation

The Consultant met: (1) Mr. R.C. Sood, Additional Secretary and Chairman, National Codex Committee (Food); (2) Mr. Kamala Prashad, Joint Secretary, Dept. of Food; (3) Dr. P.K. Kymal, Executive Director, Food and Nutrition Board; (4) Mr. P.J. Manohor Rao, Additional Chief Director, Directorate of Sugar; (5) Mr. M. Bathia, Deputy Director, Fruit and Vegetable Products; (6) Dr. Pahadia, Secretary Insecticide Board; (7) Dr. M.L. Saini, Central Insecticide Laboratory; (8) Dr. R.G. Gupta, Central Insecticide Laboratory.

During discussions, it transpired that 58 specifications for fruits and vegetable products have been finalized for adoption at the national level on the basis of Codex standards, except for the following main deviations:

- (i) The packing grades based on different sugar concentrations have not been incorporated as the industry is at present packing only one grade, and there is no internal demand for other grades of pack.
- (ii) The drained weight for different styles of pack is also not specified as at present only one drained weight for all categories of pack is in use.
- (iii) The acceptance limits for all products have not been incorporated, bearing in mind that the fruit and vegetable industry is still at the development stage.
- (iv) Use of vegetable gums, modified starch, artificial colours and flavours have not been included due to the policy decision made by the Ministry of Health at national level to restrict the use of such additives as far as possible in processed foods.
- (v) Canned mushrooms. The drained weight of the product has been prescribed at 50% instead of 53% as in Codex standards because the industry has expressed difficulty in packing button mushrooms at 53% drained weight.
- (vi) Mango nectar. The use of thickening and stabilizing agents such as carboxymethyl cellulose have not been agreed to as these additives will affect the quality of the product. At the same time, the percentage of fruit content has been laid down at 30% against mango juice having 50%.
- (vii) Fruit nectar. The minimum content of fruit ingredients has been classified in two groups with 50/30% of fruit content, with a view to partially meeting the nutritional requirements of the middle class consumers.
- (viii) The use of artificial colouring matters is not permitted in tomato products.

Sugar

Mr. Manohar Rao, Additional Chief Director of Sugar, pointed out that India produces about 6.5 million tons of plantation white sugar per year and is the third largest producer after Brazil and Cuba. The quality of white sugar produced generally conforms to the specifications laid down under Codex specifications "b" for white sugar. In India, sugar is purchased by visual appearance, i.e. colour, lustre and grain size. The Indian Sugar Standard (I.S.S.) consists of five grain sizes, i.e. A, B, C, D and E, where A is the boldest grain (0.8 to 2.00 mm) and E is the smallest grain (0.2 to 0.6 mm). The grades of colour are 30 and 29, with the former whiter than the latter.

India exports about 25,000 tonnes of raw sugar to EEC Countries and 650,000 tonnes of plantation white sugar to Middle East countries. There are about 300 sugar producing factories in India and about 30 of these factories use the double carbonation process, whereas in the others the double sulphitation method is employed. The latter method produces sugar with a residual sulphur dioxide content of up to 1.20 ppm against Codex standards limit of 70 ppm (mg/kg). Regarding the contaminants such as lead, arsenic and copper laid down in Codex standards, no data are available at present to enable comments to be made.

Tin Plate

The problem faced by the processing industry in procuring the right quality of O.T.S. tin plate at competitive prices was highlighted. Due to the non-availability and increasing cost of tin plate every year, canneries are finding it difficult to meet their internal and export commitments. In certain cases, a few canneries have had to close down due to non-availability of good quality tin plate, as well as complaints of rusting of finished

products from foreign buyers. The plate with differential tin coating, i.e. E 100:25 -E 100;50 against the availability of 1 lb tin coating and tried earlier has not been easily available. The use of differential tin coating tin plate has given rise to serious complaints from foreign buyers thereby affecting the export earnings as well as the utilization of available raw material in the country in the glut season. India is examining the laying down of national standards for O.T.S. tin plate in consultation with can manufacturers and canners in the country. It was felt that there is a need to establish Codex standards for O.T.S. tin plate and lacquer which are a part of the raw material used in the processing industry. At the same time, close collaboration between the developing countries should be brought about to produce O.T.S, tin plate from within their resources to cut down packaging costs.

Cooked Frozen Prawns (Shrimps)

The Indian Standards Institute has laid down the following microbiological requirements for frozen prawns (shrimps) before allowing export in two grades:

	<u>Grade I</u>	<u>Grade II</u>
1. Total bacterial count per g in the finished product (max.)	25,000	200,000
2. Escherichia Coli (max.)	nil	nil
3* Faecal streptococci count/g (max.)	nil	100
4. Coagulase positive (staphylococci/g max.)	nil	100
5. Salmonella	nil	nil

The need for laying down microbial limits in Codex standards for perishable food was stressed to define reasonable amounts on the analogy discussed earlier.

Pesticide and related problems

These were discussed with Dr. Pahadia, Secretary, Insecticide Board and his-scientific colleagues of the Central Insecticide Laboratory. It was brought out that 110 insecticides have been approved for use and a modified tolerance limit of 20 widely used pesticides has been enforced at the national level. A second list of 18 pesticides has been sent for publication in the Government Gazette These insecticides and their tolerance limits have been approved on the basis of data provided in Codex standards, U.S.A. and Federal Republic of Germany standards. Codex maximum limits for pesticide residues have been adopted except for malathion in cereals which has been prescribed at 4 ppm instead of 8 ppm because of the high consumption of cereals in this country. The monitoring of pesticide residues in various items of daily food will be carried out in Central and Regional Insecticide Laboratories to collect basic data as the same is not available at the national level due' to lack of resources in labour force and equipment. International organizations like FAO can provide assistance in training of personnel and the utilization of national institutions and exports from within the region.

48. Round Table Meeting with Industry and Government Representatives at the Codex Contact Point

The following invitees were present:

- (1) Mr. N.P.Bhargava, Director M/g Midland Private Ltd.;
- (2) Mr. A. Srinivasan, Secretary Export Promotion Council;
- (3) Mr. A.H. Behl, Deputy Marketing Manager, State Trading Corporation, New Delhi;
- (4) Mr. H. Bhatia Deputy Director, Fruit and Vegetable Products;
- (5) Dr. D.S. Chadha, ADG (PRA).

The following main observations were highlighted after considerable discussion:

- (i) The use of (C.M.O.) carboxymethyl cellulose in fruit and vegetables products should be restricted.
- (ii) Codex standards for (O.T.S.) open top sanitary cans and suitable lacquer for processing food be laid down to reduce contamination by lead and tin in processed foods.
- (iii) Codes of hygienic practice laid down *by Codex should be* implemented in all food processing factories. It was however pointed out by Dr. Chadha that the use of "water in canning factories conforming to the WHO International Standards may not be practicable in all factories.
- (iv) The existence of the tin content limit up to 250 ppm be maintained in absence of any toxicology data to the contrary and also tropical climatic conditions of processing "and storage.
- (v) The industry representative pointed out that effective exposure of Codex standards should be made to the industry by the national Codex Contact Point

IRAQ (25-28 February 1979)

49. Visit to Iraqi Organization for Standards - Planning Board

The Consultant met: (1) Dr. Sabah Kachachi, Secretary General; (2) Mr. Farid J. Sukkar, Head, Specification Division; (3) Mr. Yassin M. Al Rubae, Chief, Quality Control Division.

The main food items for export were reported to be dates, barley and wheat. The volume of the annual export of dates is of the order of 150,000 to 300,000 tonnes to Europe, U.S.A., Japan and Asian countries. The moisture content of dates is kept within 13 to 16%. About 100,000 tonnes is exported for industrial uses. The sugar content of dates varies from 65 to 68% which itself acts as a preservative. The proposed Codex standard for dates is generally acceptable at the national level. About 60 food standards are under formulation, mostly based on Codex standards. These are likely to be enforced within this year and are in Arabic since this is the national language. Once these standards are enforced, acceptance or acceptance with specified deviations will be communicated to the Codex Alimentarius Commission. However, the need was expressed to strengthen the enforcement machinery by training of food inspectors and food analysts to carry out inspection and sampling and analysis of food samples to maintain quality standards.

It has been felt necessary to have an Apex body for laying down national standards for foods as well as their enforcement, as at present the enforcement of food laws is carried out by the Ministry of Health.

50. Visit to the Ministry of Health

The Consultant met: (1) Dr. Felin Jorji, Director of Epidemiology and Quarantine, Directorate General of Preventive Health; (2) Dr. Falih Hassan Matar, Director of Baghdad City Health; (3) Dr. Riad Haider, Assistant General Director of Preventive Health; (4) Dr. A.N. Al Dulaimi, Central Public Health Laboratory, Food and Water Hygiene Department, Baghdad.

It was stated that the Central Public Health Laboratory in Baghdad examines samples of foods intended for import, export and domestic sale. The chemical and microbiological examination of food samples is carried out. A central insecticide laboratory is being planned which will carry out a monitoring programme of pesticide residues on food

items', in daily use. At present there is a special Committee consisting of technical representatives from the Ministries of Health, Agriculture, and Industry, to lay down maximum insecticide residue limits permissible in food. Most of the Codex standards have been adopted by re-arranging the order in Arabic language but meeting the main hygiene and quality requirements in line.

No data is available on aflatoxins and heavy metal contents in food products because of the lack of trained food analysts. An urgent need to provide analytical training in international courses, especially food contaminant analysis courses, was expressed. The general view was that:

- (a) Food additives be restricted as far as possible. If however these are used in certain selected food products, their name should be indicated on the label.
- (b) A certificate that the food exported by the exporting country is acceptable in that country to avoid dumping of substandard food in importing country.
- (c) Codes of hygienic practice; should be enforced in food processing factories initially with a further aim of improving quality requirements in gradual stages. The latter aim could be achieved by the transfer of technology, utilization of technical know-how available within the developing countries under FAO.
- (d) The tin content limit in processed food should remain at the existing level of 250 ppm for the reasons already indicated earlier.
- (e) Codex standards for O.T.S. tin plate and suitable lacquer be laid down, being a part of the raw material having a bearing on the finished food product.
- (f) Technical know how for the development of O.T.S. tin plate amongst the developing countries be developed by pooling of resources at regional level under FAO. In addition, Joint ventures could be made to develop other packaging material as the cost of imported O.T.S. tin plate is on the increase every year.
- (g) Microbiological limits under hygiene requirements of Codex standards should be indicated quantitatively for perishable foodstuffs to act as a guideline regarding their safety from any health hazard.

51. Visit to State Organization for Industries

The Consultant met: (1) Dr. Haba, Director for Research and Development; (2) Dr. Mahmoud M. Abbas, Chief Chemist.

It was pointed out that the majority of the food industries are nationalized by the government. An urgent need was stressed for the transfer of technology for rural improvements for farmers under FAO from the neighbouring countries. The training of food analysts capable of 'carrying out monitoring programmes on all items of food consumed every day with regard to contaminants like heavy metals, mycotoxins and pesticide residues was considered essential and imperative.

52. Visit to the Ministry of Agriculture and Agrarian Reform - Department of Planning

The Consultant met: (I) Dr. Samir H. Al Shakir, in-charge of FAO Affairs in Iraq and a Vice-Chairman of the Codex Alimentarius Commission.

The following main points emerged as a result of detailed discussion:

- (a) Codes of hygienic practice and hygiene requirements laid down by Codex should be accepted by all member countries to protect the consumer from any health hazards.

- (b) The development of effective food control services, training of personnel and the utilization of national institutes within the Asian Region be fully exploited under FAO.
- (c) Codex standards for O.T.S. cans and suitable lacquer be laid down to enable developing countries to use the correct type of packaging material to produce processed foods conforming to Codex standards.
- (d) Developing countries are finding it difficult to procure the right quality of tin plate for various reasons from developed countries. To enable developing countries to produce a standard O.T.S. tin plate, FAO may assist in pooling the resources in the form of available black plate, tin, coating of tin plate facilities existing in individual developing countries of the region by appropriate participation of packaging experts.
- (e) The need to organize Food Quality Control, Food Technology and Food Contaminant Analysis Courses under FAO was emphasized to enable the enforcement of national and international Codex food standards within the developing countries. These courses should be organized at appropriate national institutes having adequate facilities to run such courses.

SUMMARY AND RECOMMENDATIONS

53. Six developing countries in Asia were visited to examine the relevance and impact on growth of the food industry and on export earnings of the Recommended International Standards elaborated by the Codex Alimentarius Commission since the first standards were issued to governments for acceptance in 1970. The views and observations shared by several or all of the countries visited concern issues that are of great significance to the developing countries and fall within the revised terms of reference laid down by the Codex Alimentarius Commission for its Coordinating Committees for immediate implementation at the appropriate levels.

Codex Standards - General Remarks

54. It has been accepted by all the visited countries that various Recommended International Codex Standards for foods, Codex maximum limits for pesticide residues, methods of analysis and Recommended Codes of Hygienic and/or Technological Practice have proved very useful for references and as good guidelines in framing national food standards in individual countries.

55. The majority of the developing countries have prepared or are in the process of drafting a large number of national food standards based on data given in various published Codex standards. From the available records of the Codex Alimentarius Commission, it appears that notifications of Pull Acceptance, Target Acceptance or Acceptance with Specified Deviations, as envisaged in the General Principles of the Codex Alimentarius, has not yet been given widely. The reason is that many of the developing countries have not yet finalized their standards at the national level. However, a few of the countries visited which have accepted some Codex standards - to quote an example, the Codex Standard for Canned Pineapple - have indicated that a main drawback to acceptance of Codex commodity standards is that it has or can adversely affect their exports, for the same standards have not been accepted by importing (developed) countries for reasons already enumerated earlier under Common Observations of the Visited Countries (para 12 refers). It is therefore essential that importing (developed) countries be urged to accept Codex standards inter alia, so as to enable acceptance without adverse effects, also by exporting (developing) countries. At

the same time, it may become necessary to accept and adopt, Codex standards in steps, impressing on all member countries and especially developing (exporting) countries that they should initially accept at the national and international levels the hygiene requirements laid down in Codex standards to protect consumers from health hazards.

56. Secondary quality requirements (e.g. mainly of an aesthetic nature, length and breadths, and individual styles of products, type of pack, packing medium, definition of certain defects which are subjective in much of the fine details and cannot be quantitatively measured by standard analytical methods may often not be so necessary, and if they are stipulated at all they should be made optional,' subject to mutual agreement by importer and exporter. However, such less essential requirements of Codex standards may remain as goals to be reached over a period of time, with assistance from international agencies like FAO and with the transfer of appropriate technology.

Hygiene and Handling Requirements

57. The issue raised for laying down quantitative requirements of microbial limits in perishable items of foods, such as Quick Frozen Shrimps or Prawns, has been fully justified by developing countries to prevent unfair rejections by importing countries. It may not be always practicable to stipulate quantitative microbial limits for each item of perishable food but data presently available from the exporting countries can serve as a reasonable guideline for such limits in respect of Quick Frozen Shrimps or Prawns, as these are exported in considerable quantities to earn foreign exchange. It appears that the issue is already under active consideration by the Codex Committee on Food Hygiene and, concerning shrimps and prawns will be examined at the next session of the Codex Committee on Fish and Fishery Products. The aspects highlighted by the visited countries may be brought to their notice for its early finalization.

Tin Content

58. The issue of keeping the level of tin content at 250 mg/kg in a finished food product is fully justifiable owing to the following factors:

- (a) Open top sanitary cans needed for processing food are imported from developed countries. The developing countries have no effective control over the quality of the cans, due to lack of national standards for tin plate and lacquer for processing fresh fruits and vegetables and processed foods, etc.
- (b) Tropical climate conditions prevalent during processing; storage of finished product before its actual consumption under varying climatic conditions in the developing countries.
- (c) There is so far no toxicological evidence to confirm the toxicity of tin at the existing temporarily endorsed limit of 250 mg/kg. As such, there appears to be no reason for not endorsing the limit for tin at 250 mg/kg in Codex standards.

Accordingly, the tin content limit for apple juice and grape juice now temporarily endorsed at 150 mg/kg should be amended. In the meantime, efforts should be made to improve the processing techniques and quality of tin plate in the developing countries

- (a) transferring appropriate processing technology through utilizing the expertise available in the Region;

- (b) seeking international standards for OTS tin plate and suitable lacquer to reduce contamination of metallic contaminants especially tin and lead of processed foods.

Standards for OTS Tin Plate and Lacquer

59. There is no doubt that developing countries are experiencing great difficulties in procuring the right quality of OTS tin plate to meet not only the local but also export commitments for canning fruit and vegetable products, to earn foreign exchange. Due to the non-availability of the right quality tin plate, they have perforce to use second quality tin plate, resulting in complaints of rusting and leading to heavy rejections by importers, thus causing losses and closure of canneries.

60. It is therefore essential that a detailed specification for OTS tin plate with regard to the thickness of tin coating, grain size, base box weight, quality of lacquers to be used, should be specified. This will enable developing countries to exercise a quality check on the quality of the tin plate, which they need to import. It may be noted that this issue has been considered at an international consultation on packaging (Helsinki, 23-27 October 1978, Doc.. International Trade Centre UNCTAD/GATT/ITC/CONP/P/8 - November 1978) under coordination of and exchange of information;/on technical assistance programmes on packaging for developing countries. The Consultation made the recommendations? listed below for the attention of the appropriate international organizations concerned with follow-up action in these respects:

"The Consultation is of the opinion that establishing standards for packaging of specific products is of considerable importance to all countries because.

- (a) it should ensure optimum use of vital resources;
- (b) it should protect the consumer's interest;
- (c) It should contribute to an upgrading of technology within the country developing

Many/ countries do not possess the specialized knowledge and financial resources to develop standards related to packaging of specific products. The Consultation has recommended the initiation of a Project to identify such products having special importance for developing countries, e.g. fresh fruits and vegetables, and processed foods, etc. Based on the above recommendations made by an expert group on packaging and similar common observations reported by the countries visited, a coordinating role should be undertaken by FAO to bring countries of the Asian Region together in order to develop indigenous OTS tin plate and other cheaper packaging materials from their own resources by an appropriate TCDC programme. This will call for cooperation among packaging experts of developing countries within the Asian Region and should enable them in the long run to meet the packaging material requirements (for utilizing their vast available agriculture products) at competitive prices.

Codex Contact Points

61. At present Codex Contact Points are understaffed at the national level. This needs appropriate remedial measures at the national level to strengthen their resources as is being done in Thailand at present, where a separate division has been approved to examine and comment on Codex standards. The FAO Country Representatives can also play a useful role by appropriate follow-up action, as some of the developing countries are not sufficiently aware of the significance of Codex standards and the advantages

potentially accruing from their adoption in international trade, as well as in improving the quality of food products.

Food Additives

62. The use of food additives, especially coal tar colours and synthetic flavours, in Codex standards, wherever allowed, should be reviewed to restrict their usage unless absolutely necessary to enable:

- a) developing countries to process products in their natural forms as far as possible, without lowering their nutritive value;
- b) consumers to safeguard their interests and prevent consumption of substandard products that have been made attractive through the use of food additives such as artificial colouring and flavouring agents;
- c) to prevent fraudulent practices in trade by manufacturers in utilizing substandard products
- d) improvement of nutritional status of consumers.

Tropical Fruit Cocktail

63. The need to develop standards for fruit "cocktail" based on the use of tropical fruits like papaya, water melon, rambutan, banana, mango and guava, in addition to the fruits mentioned in the existing fruit "cocktail" standard is essential and justified. At present the finalized version of the standard for canned tropical fruit "salad" connotes a different meaning. vis-à-vis fruit "cocktail" as the latter is a universally accepted term and recognized by the average consumer for a mixture of different fruits (both small fruits and small pieces of fruits).

Food Control Services

64. The strengthening of food control services, training of personnel and utilization of national institutes and experts from within the region is a recognized urgent need of the developing countries. A timetable should be adopted to put developing countries in a position to have sufficient expertise by way of trained food inspectors and food analysts as well as adequately equipped laboratories to ensure enforcement of national and international food standards. FAO should make provision for the necessary assistance in its medium range programme, according to the main purpose of the Joint FAO/WHO Food Standards Programme, i.e. to protect the health of consumers and to ensure fair practices in the food trade both at national and international levels.

Codex Standards - Specific Remarks

65. Based on the common observations reported earlier by the countries visited, the following Codex standards being of economic interest to the developing (exporting) countries need reexamination at the appropriate level:

	<u>Codex Commodity Standard</u>	<u>Issues for Re-examination</u>
1.	Canned Pineapple	(Regarding quality requirements mainly of an aesthetic nature)
2.	Quick Frozen Shrimps or Prawns	(Regarding microbiological parameters and defects tables)
3.	Canned Sardines	(Regarding inclusion of species canned in Thailand and India and defect tables)
4.	Canned Mushrooms	(Regarding drained weight)
5.	Canned Fruit Cocktail	(Regarding inclusion of tropical fruits; colours and flavours)

- | | | |
|-----|--------------------------------------|---|
| 6. | Canned Pineapple Juice | (Regarding food additives - flavours) |
| 7. | White Sugar | (Regarding food additives - sulphur dioxide) |
| 8. | Canned Apple Juice | (Regarding Tin Contaminant and food additives - flavours) |
| 9. | Canned Matured Processed Peas | (Regarding food additives) |
| 10. | Canned Grape Juice | (Regarding Tin Contaminant and food additives) |
| 11. | Canned Green Peas | (Regarding Food Additives) |
| 12. | Edible Fats and Oils | (Regarding Food Additives) |
| 13. | Canned Tropical Fruit Salad | (Regarding its connotation vis-à-vis fruit cocktail) |

CONCLUSION

66. Before concluding my report, it is strongly recommended that regular dialogue be maintained between the Codex Secretariat, the Regional Coordinators of Codex Coordinating Committees and member nations, especially those from developing countries, which are at times unable to send their delegations to attend technical meetings, often on account of financial constraints at the national level. Such a dialogue can best be served by either strengthening the Codex Secretariat with more technical staff by utilization of part-time consultants to visit selected developing countries at intervals of say 1-2 years to explain the potential advantages of accepting Codex standards and implementing training and other programmes planned for strengthening food control infrastructure in developing countries under international organizations such as FAO.

Acknowledgements

67. The Consultant's thanks are due to all the staff of the national food legislative and inspection authorities, and the food industries, and of the United Nations Agencies in the countries visited for helpful information and the courtesies extended which enabled him to fulfill his terms of reference as a food standards consultant. The kind cooperation and assistance provided by the FAO/WHO Secretariat in Rome is also gratefully acknowledged.

ANNEX I

LIST OF PERSONS MET DURING THE VISIT:

THAILAND (Bangkok)

- A. Institute of Food Research and Product Development, Kasetsart University, Bangkok
1. Professor Amara Bhumi Ratana, Director
 2. Dr. Suchon Nimmannithya, Food Technologist
- B. Ministry of Industry
3. Mr. Paprit Na Nagara, Director General, Department of Science
 4. Ms. Sermsii Gongsakdi, Secretary, National Codex Alimentarius Committee
 5. Mr. Chriwai Sangruji, Director Thai Industrial Standards Institute
- C. Ministry of Public Health
6. Mr. Pora Tamprateep, Deputy Secretary General, Food and Drug Administration
 7. Mr. Theera Satasuk, Director, Food Control Division, Food and Drug Administration
- D. FAO Regional Office for Asia and the Far East
8. Dr. D.B. Reddy, Deputy Regional.. Representative.
 9. Dr. Qureshi, Rahmat U., Food Policy and Nutrition Officer
 10. Mr. W. Theis, Associate Expert, Regional Officer for Food Control and Standards

MALAYSIA (Kuala Lumpur.)

- A. Ministry of Health
1. Dr. H.J. Wanmahmud B. Othman, Assistant Director of Health, Food Quality Control Unit
 2. Dr. Aziz Harrison, Medical Officer of Health, Food Quality Control Unit
 3. Ms. Noraini Sudin, Food Technologist, Food Quality Control Unit
- B. Agricultural Research and Development Institute
4. Dr. Ahmed Zaharudin Bin Idrus, Head Agricultural Product Utilization Division (APU)
 5. Ms. Chia Joo Suan, Officer-in-charge, Chemical Analysis Laboratory, Quality Control Section (APU)
- C. Ministry of Agriculture.
6. Dr. S. Thurai Singham, Director General of Veterinary Services
 7. Dr. A. Bala Subramaniam, Secretary,. Pesticide Board
- D. Standard and Industrial Research Institute (SIRIM) - Ministry of Science, Technology and Environment
8. Dr. Abdullah Bin Mohamed Yusuf, Controller
 9. Mr. Lim Ho Phehg, Director
 10. Mr. Robert D, Pereira, Head, Industrial Liaison

E. Ministry of Primary Industries

11. Mr. Anna Buang
12. Mr. Annas Khatib Jafar
13. Mr. Hashin Hassan.
14. Mr. Hassan Ismail
15. Mr. Ng Hong Chai, Malaysian Pineapple Industries Board

F. Federation of Malaysian Manufacturers

16. Mr. Lim Chong Keat, Deputy Director G. United Nations Office
17. Mr. R.T. Batra, Deputy *Regional Representative, UNDP*
18. Mr. Devlin, FAO Consultant

INDONESIA (Jakarta)

A. Ministry of Health

1. Dr. A. Heman, Director, Food Control, Directorate General for Drugs and Food Control
2. Dr. Simatupang, Microbiologist, Food Control Laboratory

B. Department of Agriculture

3. Dr. Suwadi Sindurejo, Chief, Food and Nutrition Unit
4. Dr. Soeyono Surupati, Food and Nutrition Unit

C. Directorate General Multifarious Industries - Ministry of Industry

5. Ir. J.P. Wattimer, Director for planning and programming
6. Dr. N.A. Koesoe Mored Jo, Director for Standardization and Quality Control.
7. Dr. Ir. Ny Y. Darmawan

E. United Nations Office

8. Mr. J.G. Rumeau, FAO Representative in Indonesia

PHILIPPINES (Manila)

A. Department of Health

1. Mr. Arsenic M. Regala, Administrator, Food and Drug Administration
2. Ms. Catalina K. Sanchez, Deputy Administrator, Food and Drug Administration
3. Ms. Maria G. Yap, Chief, Food Section, F.D.A. Laboratory•
4. Ms. Cecilia L. Gomez, Chief, Research Bacteriologist, F.D.A. Laboratory
5. Mr. Iluminado P. Reyno, Chief, Food Inspector, F.D.A. Laboratory
6. Ms. Verena-Benabese, Executive Secretary

B. Department of Agriculture - National Meat. Inspection and Bureau of Animal Industry

7. Dr. S. Salvadore Escudero, Director and Chairman, National Meat Inspection Commission
8. Dr. Prudencio L. Tamayo, Assistant Executive Director
9. Dr. Josefino Froyalde Rialde, Chief of Regulations and Control Division, Bureau of Animal Industry

C. Industries

10. Mr. Carlos Villa-Abrille, Executive Vice-President, Amalgamated Creameries Manufacturing Corporation and former President Philippines Chamber of Food Manufacturers
11. Mr. Vioente H. Lim Jr., Philippines Packing Corporation, Manila
12. Mr. Atty Samson B. Turingan, Assistant Corporate Secretary
13. Mr. Patrick O Ng, Division Manager, Universal Robena Corporation, Manila
14. Mr. Mark H. Gosgriff, Technical Consultant, Universal Robena Corporation, Manila

D. Industrial Research Centre - National Institute of Science and Technology, Manila

15. Ms. Olympia N. Gonzales, Officer-in-charge, Industrial Research Centre
16. Ms. Mercedes R. Soriano, Officer-in-charge, Food Technology Research Division

E. Food and Nutrition Research Institute - National Science Development Board, Manila

17. Ms. Benigna V. Roxai, Senior Research Supervisor, Nutrition Biochemistry Division
18. Ms. Loreto M. Dumadang, Food Contaminant Section

F. Bureau of Plant Industry, Manila

19. Ms. T. Alvarez-Antazo, Officer-in-charge, Pesticide -Residue Laboratory
20. Dr. Thomas Wieland, Consultant Pesticide Residue Project ('Frankfurt)

G. United Nations Office

21. Mr. C.R. McCulloch, FAO Representative in the Philippines

INDIA (New Delhi)

A. Ministry of Health

1. Mr. D.S. Chadha, Assistant Director-General of Health Services and Liaison Officer National Codex, (Food Product Standards) Committee
2. Ms. Debi Mukerjee, Assistant Secretary, Central Committee for Food Standards
3. Mr. T.V. Antony, Joint Secretary
4. Dr. Ranjit Sen, Deputy Director-General Health Services

B. Ministry of Agriculture and Irrigation

5. Mr. R.C. Sood, Additional Secretary and Chairman national Codex Committee (Food)
6. Mr. Kamala Parashad, Joint Secretary, Dept. of Food
7. Dr. P.K. Kymal, Executive Director, Food and Nutrition Board, Dept. of Food
8. Mr. P.J. Manohar Rao, Additional Chief, Director Directorate of Sugar
9. Mr. A.K. Aggarwal, Agriculture Marketing Advisor, Dept. of Agriculture
10. Mr. M. Bathia, Deputy Director, Fruit and Vegetable Products, Dept. of Food
11. Dr. Pahadia, Secretary Insecticide Board

12. Dr. M.L. Saini, Central Insecticide Laboratory
13. Dr. R.C. Gupta, Central Insecticide Laboratory

C. Industry

14. Mr. N.P. Bhargava, Director N/s Midland Private, New Delhi
15. Mr. A. Srinivasan, Secretary, Export Promotion Council, New Delhi
16. Mr. A.K. Behl, Deputy Marketing Manager, State Trading Corporation, New Delhi

D. United Nations Office

17. Dr. A.S. Alwan, FAO Representative in India
18. Mr. Nicholas H.B. Hughes, Programme Officer (FAO)

IRAQ (Baghdad)

A. Iraqi Organization for Standards - Planning Board

1. Dr. Sabah Kachachi, Secretary General
2. Mr. Farid J. Sukkar, Head Specifications Division
3. Mr. Yassin M. Al Rubaei, Chief, Quality Control Division

B. Ministry of Health

4. Dr. Felix Jorji, Director of Epidemiology and Quarantine, Directorate General of Preventive Medicine
5. Dr. Riyadh Haider, Assistant Director General of Preventive Health
6. Dr. Falih Hasean Matar, Director of Baghdad City Health, Baghdad
7. Dr. A.N. Al Dulaimi, Central Public Health Laboratory, Food and Water Hygiene Department, Baghdad

G. State Organization for Industries

8. Dr. Haba, Director for Research and Development.
9. Dr. Mahmood M. Abbas, Chief Chemist

D. Ministry of Agriculture and Agrarian Reform

10. Dr. Samir H. Al Shakir, In-charge FAO Affairs in Department of Planning and Vice President Codex Alimentarius Commission

E. United Nations Office

11. Mr. N.D. Al Khalifa, FAO Representative in Iraq
12. Mr. Y. Joury, Resident Representative UNDP in Iraq.
13. Mr. K. Padma Nabhan, Assistant Resident Representative UNDP in Iraq
14. Mr. Abdullah Elah, FAO

PROBLEMS FOR MEETING THE REQUIREMENTS FOR TIN CONTENTS FOR SOME
CODEX STANDARDS OF CERTAIN CANNED FRUIT JUICES AND CANNED FRUITS
AND VEGETABLES - PAPER REGARDING

(Prepared by the Delegation of India)

1. In the First Session of the Codex Coordinating Committee for Asia, held in New Delhi from 10 to 16 January 1978, it was agreed that the agenda for the next session should include discussion on "problems encountered in meeting the requirements for tin contents in some Codex standards for certain canned fruit juices and canned fruits and vegetables." India was asked to prepare a working paper on the subject.
2. In the recommended International FAO/WHO Codex Standards for certain canned fruit juices and canned fruits and vegetables, the maximum level of tin as a contaminant has been provisionally endorsed at 250 mg/kg except in the case of apple juice, apple juice concentrate, grape juice, concentrated grape juice, sweetened concentrated Labrusca type grape juice and draft standards for non-pulpy black currant nectar packed in lacquered cans, wherein 150 mg/kg has been recommended.
3. In several meetings of the Codex Commodity Committees and Codex Commission, the representatives of Australia, Brazil, India, Mexico, Thailand, U.S.A., etc. had expressed their views that under tropical conditions of processing and storage, tin pick-up may go beyond 100 mg/kg after six months and beyond 200 mg/kg after one year of storage. Delegates from European countries like the Federal Republic of Germany, Norway, Poland, Sweden, etc. held the view that the limit of tin content in processed fruits and vegetables/fruit juices should not exceed 150 mg/kg.
4. In the 12th session of the Joint ECE/Codex Alimentarius Group of Experts on Standardization of Fruit Juices, held in Geneva from 19 to 23 July 1976, the Group considered the level of tin and lead in fruit juices in the light of technological information and data on consumption. The technological paper on tin emphasized the need for toxicological research as current data concerning the toxicity of tin was limited. It was further noted that the form of tin and tin compounds needed to be clearly identified in order that the Joint Expert Committee on Food Additives could make a toxicological evaluation in the light of further data.
5. During the discussion of the paper several delegations felt that there could be two approaches to the question of the level of tin in fruit juices. One could be from the purely toxicological side, i.e. the establishment of an ADI or weekly tolerated intake. On the other hand, the matter could be approached by an examination of manufacturing practices and by a serious endeavour to reduce as low as would be technologically possible the level of tin in the product. Ideally, both aspects must be taken into consideration.
6. The delegation of the United States of America supplied information on the tin levels found in fruit juices packed in various containers and kept under accelerated storage conditions i.e. 100°F. This information indicated that tin, whilst being a contaminant, also served a functional purpose in protecting the colour and flavour of the juice. The addition of stannous chloride had been also briefly examined but current information indicated that even when the product contained up to 250 mg/kg, it only retained an acceptable colour and flavour for a storage period of 3 months. The Group agreed that there was a need to stimulate more work to supply information for a

toxicological evaluation to be carried out by the Joint Expert Committee on Food Additives.

7. In the 12th session of the Codex Alimentarius Commission held in Rome from 17 to 28 April 1978, while discussing the draft standard for non-pulpy black currant nectar, several delegations including India pointed out that in this draft standard the maximum level of tin was set at 150 mg/kg whereas in other standards 250 mg/kg of tin were permitted. These delegations suggested establishing a tentative uniform level of tin of 250 mg/kg for fruit juices until a final decision could be taken, based on technological evaluation of tin compound by the Joint FAO/WHO Expert Committee on Food Additives. The Commission was informed by the Chairman that due to the nature of the product lacquered cans had to be used for non-pulpy black currant nectar and that therefore 150 mg/kg of tin was justified. In the case of fruit juices from tropical climates, however, higher limit for tin was required and maximum level of 250 mg/kg of tin had been incorporated in the relevant standards.

8. In the 11th session of the Codex Committee of Food Additives, held in the Hague between May 31 to June 6 1977, the delegation of the Federal Republic of Germany expressed the view that there were insufficient data available to decide whether or not to endorse limits of toxins in the food under consideration, and recommended that the Commodity Committee should supply appropriate data.

9. In the 14th Session of the Codex Committee on Processed Fruits and Vegetables, held in Washington from 26 to 29 September 1978, while discussing the draft standards for pickled cucumbers, delegations of the Federal Republic of Germany, the Netherlands and Poland reserved their position concerning the maximum level of 250 mg/kg tin which was in their opinion unduly high.

10. The Committee was informed that the Commission, at one of its recent sessions, had specifically recommended that the standards for processed fruits and vegetables should include a section on contaminants which would include other contaminants besides tin. The Committee attached particular importance to arriving at international limits for contaminants, especially tin, but also others such as lead and cadmium, in the interests of consumer protection and the facilitation of international trade.

11. In order to arrive at meaningful international limits, it was necessary for governments to make greater efforts to provide the Committee with the necessary data concerning limits needed in their countries, in order to enable the Committee to be in a position to propose, for consideration of the Codex Committee on Food Additives, maximum limits based on a discussion of actual data. At the same time, there was a need for the relevant toxicological data to be made available by governments to the Joint FAO/WHO Expert Committee on Food Additives.

12. The main problem was that not much data had been provided so far by governments and the Committee wished to bring this matter to the attention of the Commission. The Committee also wished to make known to the Commission its concern about the importance of this problem of contaminants and also about the need to make greater progress in this area, particularly as regards levels for tin. Priority needed to be given to this matter both by governments through the provision of data and also by the Joint FAO/WHO Expert Committee on Food Additives.

13. Concerning limits for tin in the standards for processed fruits and vegetables, it was noted that a provisional figure of 250 mg/kg had been accepted by the Commission, pending the outcome of toxicological studies. Although a number of delegations thought

the existing figure mg/kg for tin was much too high in several and indeed in most of the standards, nevertheless it was the majority view in the Committee that, as a general working principle, it would not be appropriate to change this figure at this time and that it would be better to await the outcome of the toxicological studies. However, this would not prevent the Committee from recommending whatever figures it thought proper concerning maximum limits for tin in the standards under discussion at the present session. The delegation of Mexico drew attention to the need for taking into account dietary patterns in each country.

14. As a practical step towards meeting this problem, the Committee decided to establish a Working Group from amongst the members of the Committee.

15. A Working Group consisting of representatives of Australia, Brazil, Canada, Federal Republic of Germany, India, Japan, Mexico, Poland, Thailand and USA was constituted for the purpose to obtain data on actual levels of contaminants in processed fruits and vegetables and *to make* recommendations to the Committee on maximum limits which may be included in standards for these products. The Chairman of the Working Group, vide his letter No. 305-12-456 dated 9-2-1979 has suggested that as a first step in obtaining the necessary data, it is proposed to circulate a questionnaire to all Codex Contact Points. A draft questionnaire based on the format of the information provided to the Committee by the Government of Poland on levels of arsenic, copper, lead, tin and zinc has been prepared. A copy of the draft questionnaire has been received for comments of the members of the Working Party. After finalizing the questionnaire the Chairman has proposed to circulate the same in early April, 1979. Member countries will be asked to complete the questionnaire and return to the Chairman of the Working Group not later than 1st September 1979. Reply to this questionnaire shall be compiled and discussed by the Working Group one day before the meeting of the Committee on Processed Fruits and Vegetables to be held in Washington in 1980.

16. In view of the foregoing, this Conference may recommend that status quo may be maintained in the various Codex Standards for contaminants till toxicological studies are completed.

APPENDIX V

SPECIFIC LABELLING PROVISION FOR PROCESSED MEAT PRODUCTS WITH REGARD TO ISLAMIC RELIGIOUS REQUIREMENTS

(Prepared by the Delegation of Malaysia)

1. Objective of Paper

This paper presents an overview of the labelling provision for processed meat products with regard to Islamic religious requirement in the context of Malaysia. It is hoped that this paper will serve as a guide to any nation wishing to have such labelling requirements in its country. Indeed it is imperative that subsequent discussion on this matter should generate interest in this session in the creation of cooperation among Asian Countries to formulate an exemplary labelling provision with regard to Islamic requirements which could be used as a model for any country.

2. Introduction

Arising from the report of the first session of the Codex Coordinating Committee for Asia in New Delhi, 10-16 January 1978, some delegates expressed the view that in order to respect certain religious beliefs Codex standards for processed meat products should contain labelling provisions concerning the type of meat and the manner of slaughter of the animals from which the meat was derived. It was pointed out that this could best be achieved on a national level by having specific labelling requirements for such products in the relevant legislation.

Food which is forbidden for consumption is a very personal and sensitive matter to a Muslim. According to Islamic religious requirement a Muslim is prohibited from consuming food which contains impurities and food which by its nature or origin is strictly forbidden according to the prescribed Islamic Laws. What are considered as impurities or what types of meat that cannot be eaten are very clear and are all regulated in the laws of Islam.

In Malaysia there are more than 5.8 million Muslims which form about 53% of the whole population. Islam is also the official religion of the country and is duly recognized by the Malaysian Constitution. From the viewpoint of the need to prevent misuse and exploitation by irresponsible elements, the Malaysian Government in 1975 took a step forward by declaring an order prescribing the use of labelling in processed meat product known as The Trade and Descriptions (Marking of Food) Order, 1975. (See Appendices I and II).

3. Salient aspects of the labelling provision

- (i) In Malaysia, all meat and offals including that of poultry which are:
 - (a) fresh, chilled or frozen;
 - (b) cooked, canned in any other manner preserved and such cooking, canning or in preservation which are "Halal" according to "Hukum Syarak" or Laws of Islam shall not be supplied unless they are marked by a label, tag or any other form of marking indicating that it is "Halal". In other words, only those processed meats that are Halal shall be labelled as such when such food is supplied in Malaysia. If the processed meat is not "Halal", the label "Halal" shall not be used.

- (ii) Malaysians normally label meat or food products with words such as "Halal", "Ditanggung Halal", or "Muslim Food". Their meanings are basically the same where the crucial term is "Halal" which signifies that the said food is fit for consumption by Muslims. These expressions when used in relation to such food in trade or business shall have the following meanings:
 - (a) neither is nor consists of or contains any part or matter of an animal that a Muslim is prohibited by Hukum Syarak to consume or that has not been slaughtered in accordance with Hukum Syarak (Laws of Islam);
 - (b) does not contain anything which is considered to be impure according to Hukum Syarak (Laws of Islam);
 - (c) has not been prepared, processed or manufactured using any instrument that was not free from anything impure according to Hukum Syarak (Laws of Islam) and
 - (d) has not in the course of preparation, processing or storage been in contact with or close proximity to any food that fails to satisfy paragraphs (a), (b) or (c) or anything that is considered to be impure according to Hukum Syarak.
- (iii) In the context of Malaysia "Hukum Syarak" means the Laws of Islam in the Mazhabs of Maliki, Hambali or Hanafi which are approved by the Yang di Pertuan Agong to be in force in the Federal Territory or the Ruler of any State to be in force in the State.
- (iv) What is impure or "najis" is an important aspect in the labelling provision. If food or meat products contain najis or impurities they are automatically forbidden for consumption by Muslims. The term "najis" is a religious term which encompasses such things as:
 - (a) all parts of the pig, the dog and their products
 - (b) Carcasses with the exception of fish and grasshopper
 - (c) blood, pus and the like with the exception of the heart
 - (d) Urine
 - (e) Faeces
 - (f) Vomitus
 - (g) Alcohol and other intoxicants
- (v) There are certain types of meat which are forbidden by Islam for consumption by a Muslim. They are as follows:
 - (i) animals which ordinarily can be consumed but are not slaughtered according to Islamic requirements. They are considered as carcasses. Carcasses are strictly forbidden to be consumed.
 - (ii) meat which is cut from an animal while it is alive cannot be consumed even if the said animal is permitted by Islam to be eaten. Similarly such meat products are considered as carcasses.
 - (iii) the pig, the dog and their issues.
 - (iv) wild animals which have claws such as tigers, lions, bear, etc.

- (v) birds which have huge claws and use them for the purpose of holding food like the eagles, bats and etc.
 - (vi) animals that are encouraged by Islam to be destroyed such as rats, scorpions etc.
 - (vii) animals which are forbidden to be destroyed such as ants, spiders and the like.
 - (viii) animals that are dangerous to human health and having distasteful look such as flies, worms and others.
 - (ix) animals whose principal food is animal and human faeces.
 - (x) animals which are venomous and dangerous to man.
 - (xi) animals that can survive or live on two habitats i.e. in water and land such as frogs, crocodiles, giant lizard and certain types of crabs. This provision is strictly adhered to by Muslims following the Mazhab Shafie.
- (vi) To meet Islamic religious requirements the slaughter house and instruments used must be free from all impurities. Slaughter houses in Malaysia in practice are separated into those that are used to slaughter animals permissible by Islam and those which are not. Goats, cattle and sheep are wholly slaughtered by Muslims and subscribe to the requirements of Islam. The manner for slaughter is embodied in Hukum Syarak (Islamic Laws) where the following condition must be adhered to:
- (a) The person who performs the slaughter must be a Muslim who is of sound mind and knows how to slaughter according to Islamic requirements.
 - (b) The animal must be alive and in the process of slaughtering the "halkum" (throat/gullet/oesophagus) and "mari" (windpipe) should be cut.
 - (c) The instruments used must be sharp and capable of cutting and not a derivative of bones.

Officers of the Ministry of Trade and Industry in Malaysia are entrusted with powers to enforce these labelling provisions. Any contravention or breach of the labelling provisions is punishable by a fine not exceeding \$5,000 (Malaysian) or 2 years jail or both. To ensure the term "Halal" is correctly used in the label, certain provisions are being considered for inclusion in the food laws.

Conclusion

It is undeniable that specific labelling for processed meat products with regard to Islamic religious requirements is an important development in Malaysia. Religious beliefs are deeply ingrained in the hearts of the Muslim in Malaysia and probably the whole world whose total Muslim population exceeds 800 million. The distribution of the Muslim population, although clusters around the Middle East, it has found its way to a greater part of Asia and is fast spreading in Africa and the West. The combined population of Muslim in Pakistan, Bangladesh, Indonesia, India and Malaysia alone is about 270 million.

Certainly the very fact that a huge population of the world community adhere to the Muslim religion and the general resurgence of Islamic consciousness among Muslims in this region, it is timely and wise that greater attention should be given to ensure that the processed meat products are fit for human consumption by Muslims. The Malaysian experience in providing labelling provision should serve only as a guide. There is much room for improvement.

Recommendation

It is hereby recommended that the Codex Coordinating Committee for Asia should consider the possibility of formulating ways and means to create a consciousness among nations to ensure that food labelling according to Islamic requirements becomes a reality. Recommendations detailing enforcements, techniques and regulations based on a formulated model law relating to labelling provisions according to Islamic requirements should also be seriously considered so that there is no room for undue exploitation and abuse in the use of the label.

Appendix I

TRADE DESCRIPTIONS ACT, 1972

Act 87. In exercise of the powers conferred by section II of the Trade Descriptions Act, 1972, the Minister hereby makes the following order:

- Citation. 1. This Order may be cited as the Trade Descriptions (Marking of Food) Order, 1975.
- Information to be supplied. P.U. (A) 237/75 2. (1) All food specified in the Schedule hereto which is Halal according to the Trade Description (Use of expression "Halal") Order, 1975 shall not be supplied unless it is marked by a label, tag or any other form of mark indicating that such food is halal.
(2) All uncooked meat and offals including that of poultry shall not be supplied unless it is marked by a label, tag or any other form of mark indicating that such meat or offal had or had not been chilled or frozen.

SCHEDULE

All meat and offals including that of poultry which is-

- (a) fresh, chilled or frozen;
- (b) cooked, canned or in any other manner preserved and such cooking, canning or preservation is done in Malaysia.

Made this 18th day of September, 1975
[PN. (PU2) 120; B. PGK. 0. 5001/3/32]

HAJI MOHAMED BIN YAACOB
Minister of Trade and Industry

TRADE DESCRIPTIONS ACT, 1972

In exercise of the powers conferred by section 10 of the Trade Descriptions Act, 1972, the Minister hereby makes the following order: Act 37

1. This Order may be cited as the Trade Descriptions (Use of Expression "Halal") Order, 1975 Citation
2. In this Order unless the context otherwise requires: Definition

"Hukum Syarak" means the Laws of Islam in the Mazhab Shafie or the Laws of the other Mazhabs of Maliki, Hambali or Hanafi which are approved by the Yang di Pertuan Agong to be in force in the Federal Territory or the Ruler of any State to be in force in the State.

3. When used in relation to food in any form whatsoever in the course of trade or business as or as part of, a trade description applied to the food, the expressions "Halal", "Ditanggung Halal" or "Makanan Islam" or any other expression indicating or likely to be understood as indicating that Muslims are permitted by their religion to consume such food such expression shall have the following meaning, that is to say the food in relation to which such expression or expressions are used -

- (a) either is nor consists of or contains any part or matter of an animal "Halal" that a Muslim is prohibited by Hukum Syarak to consume or that has defined not been slaughtered in accordance with Hukum Syarak;
- (b) does not contain anything which is considered to be impure according to Hukum Syarak;
- (c) has not been prepared, processed or manufactured using any instrument that was not free from anything impure according to Hukum Syarak; and
- (d) has not in the course of preparation, processing or storage been in contact with or close proximity to any food that fails to satisfy paragraph (a), (b) or (c) or anything that is considered to be impure according to Hukum Syarak.

Made this 29th day of July, 1975.

[PN. (PU2) 120; B. PGK. 0.5001/3/32]

DATUK HAJI HAMZAH BIN HAJI ABU SAMAR
Minister of Trade and Industry

EXTRACT FROM REPORT OF THE COUNCIL OF FAO
(Seventy-Fourth Session, 27 November-7 December 1978)

" Food Standards Matters and the Work of the FAO/WHO
Codex Alimentarius Commission

72. The Council had before it the response of the Joint FAO/WHO Codex Alimentarius Commission to a request from the Seventy-First Session of the Council (June 1977) that the Commission consider and report on certain matters concerning the economic implications of the international food standards for developing countries. It also had before it a report on changes in the content and direction of the work of the Commission designed to place increased emphasis and concentration on the needs and concerns of developing countries, as had been requested by the Nineteenth Session of the FAO Conference. The Council noted that these matters had been reviewed by the Programme Committee at its Thirty-First Session in October 1978. The Council generally agreed with the views and recommendations of the Programme Committee on these matters.

73. The Council welcomed the action which had been taken by the Commission to meet the needs and concerns of developing countries. In particular, it approved the policy and work reorientation by the Commission and the new procedures for the assessing of the economic impact of the international food standards, which were intended to benefit all countries. The Council agreed with the Programme Committee that the effectiveness of the new procedures would depend, to a large extent, on the mechanism evolved within the Commission and its Secretariat for dealing with trade impact statements from governments and decided that these matters should be followed by the Programme Committee and itself.

74. The Council agreed with the Commission's action in adjourning certain Codex Committees and in establishing a Codex Committee on Cereals and Cereal Products and a Codex Committee on Vegetable Proteins, as well as reactivating the Codex Committee on Meat Hygiene. The increased emphasis by the Commission on the importance and role of the Codex Regional Coordinating Committees for Africa, Asia and Latin America was also approved by the Council. The Council agreed with the Programme Committee that there would be a need to exercise caution in elaborating regional food standards since regional standards, if not confined to products moving solely in intra-regional trade, could possibly become barriers to world-wide trade. The Council also agreed with the Programme Committee that, in principle, the Commission should continue to give priority in its work to the development of food standards for finished products rather than for raw materials. The Council underlined the need for strengthening food control infrastructures in developing countries to assist them in implementing the recommendations of the Commission.

75. The Council stressed the value of the work of the Codex Alimentarius Commission to all countries and agreed with the Programme Committee that, in view of the importance of this work within the overall context of nutritional improvement, food production and food trade, the Council would follow general policy trends within the Commission."