

Developing national or regional positions and written comments -A case study from Japan-

Yoshiyuki TAKAGISHI

Associate Director

Food Safety Policy Division

Food Safety and Consumer Affairs Bureau



Ministry of Agriculture, Forestry and Fisheries (MAFF)
of Japan

OUTLINE OF MY PRESENTATION

1. Key considerations in developing a national/regional position and written comments, and reflecting them in discussions at Codex meetings
 - Share advantage of active participation with stakeholders
 - Base on science
 - Ensure consistency
 - Communicate with international colleagues
2. Examples on Japan's experiences on food safety related Codex Committees (CCFA, CCPR)
 - Establishment of the General Standard for Food Additives
 - Revision of Codex Classification for food and feed

Share advantage of participating in Codex work with stakeholders

= Codex standards for food safety

- According to the SPS Agreement:
 - "Members shall base their SPS measures on international standards..., where they exist...."
- If a member's situation is reflected in Codex standards,
 - Food safety standards/production practices in the member may become consistent with Codex standards
 - Food safety standards in other countries/regions may become consistent with those in the member
- For developing an effective national position, it is necessary to share advantage of participating in Codex work among the competent authority(ies) and stakeholders including industry

Base on science

■ “The food standards, guidelines and other recommendations of Codex Alimentarius shall be based on the principles of sound scientific analysis and evidence”

Reference: Statements of Principle Concerning the Role of Science in the Codex Decision-Making Process and the Extent to which other Factors are taken into Account



■ Need for preparing a scientifically sound national position/written comments



■ Competence development for delegates to understand principles for establishing relevant Codex standards

■ Preparing proposal with scientific rationale, preferably with the result of analysis of relevant data/information

- Collect and analyze the available data/information
- Consider what you can propose from them


Ensure consistency

- Consistency is the key to gaining trust of the Chair, Secretariat, members/observers.



- Preparation of a position/comments consistent with:
 - principles, rules and procedures
 - agreement/decision made at the past meetings
 - The relevant provisions in general standards and those in individual(commodity) standards
- In Codex meetings, consistent intervention throughout:
 - electronic/physical working group(s) to the plenary
 - agenda items

Communicate with international colleagues

- To facilitate adoption or amendments of standards by consensus, it is important to share members' positions before and during the session
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- Participation to informal face-to-face meetings of CCASIA members led by the Coordinator for Asia
 - Informal discussion with members/observers during coffee breaks
 - Identification of common interests and concerns among member countries (You can find “friends”)
 - Finding support from other members for mutually interested issues
 - Finding possible compromise to facilitate reaching consensus for controversial issues



Example 1 (CCFA)

Establishment of the General Standard or Food Additives

General Standard for Food Additive (GSFA)

- Contains:
 - The general principles for the use of food additives
 - Only those food additives for which Acceptable Daily Intakes (ADI) have been recommended by JECFA
 - Only technologically justified food additive uses
 - Maximum uses of food additives established for food categories
- Covers all foods (not only standardized foods but also non-standardized foods)

Active Participation of Japan

- Submission of comments on technological justification and maximum use levels to electronic working group if the food additive in question presents no appreciable health risk to consumers
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- Submission of comments
 - On the use of food additives in Japan consistent with the rule of procedure for establishing food additive provisions
 - for correctly listing the function of food additives
 - Voluntary check of the consistency with the food additive provisions of commodity standards to the relevant provisions of GSFA
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- increased confidence of intervention by Japan

Advantage of participating in the establishment of GSFA

- It will be easier for us to understand food additive provisions/standards in other countries/regions if we comprehend the content of the latest GSFA
- Food additive provisions/standards in other countries/regions may become consistent with those in Japan, if the use of food additives in Japan is reflected in the GSFA



- There is no need for Japanese manufacturers to change manufacturing procedure of foods for export

Example 2 (CCPR)

Revision of Codex Classification of Food and Feed (2014-)



Codex Classification of Food and Feed (CAC/MISC 4-1989)

- The classification is intended:
 - primarily to ensure the use of uniform nomenclature and;
 - secondarily to classify foods into groups and/or sub-groups for the purpose of establishing group maximum residue limits for commodities with similar residue potential
- CCPR started revision since 2006
- Submission of comments based on the analysis of relevant data/information for revision of some groups
 - Fruiting vegetables, cucurbits; legumes vegetables and pulses; cereal grains
- Increased confidence of intervention by Japan



Group 11 Fruiting vegetables, cucurbits

- establishment of subgroup -

- Issues: whether to separate fruits harvested immature (e.g. cucumber, summer squash) and those harvested mature (e.g. melon, winter squash)
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- Japan provided data/information on:
 - Difference of in residue potentials at the time of harvest arising from the different growth of fruits in weight
 - Difference in pre-harvest intervals
 - ✧ For cucumbers and summer squashes, fruits are continuously harvested when immature every day for a period of some months
 - ✧ For Melons and winter squashes, fruits are harvested at their maturity at the end of cultivation
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Agreed by CCPR to establish two subgroups

Group 11 Fruiting vegetables, cucurbits - establishment of subgroup -

Examples of the data on the period of growth and harvest

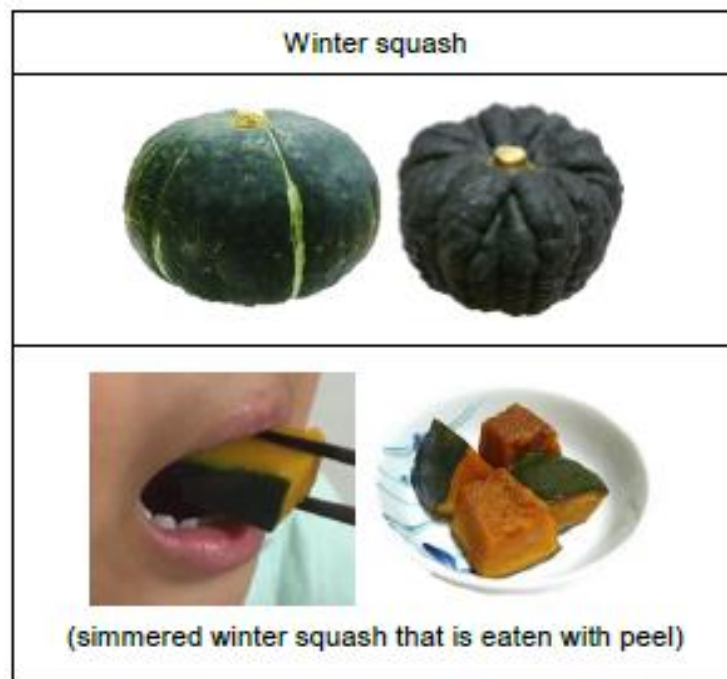
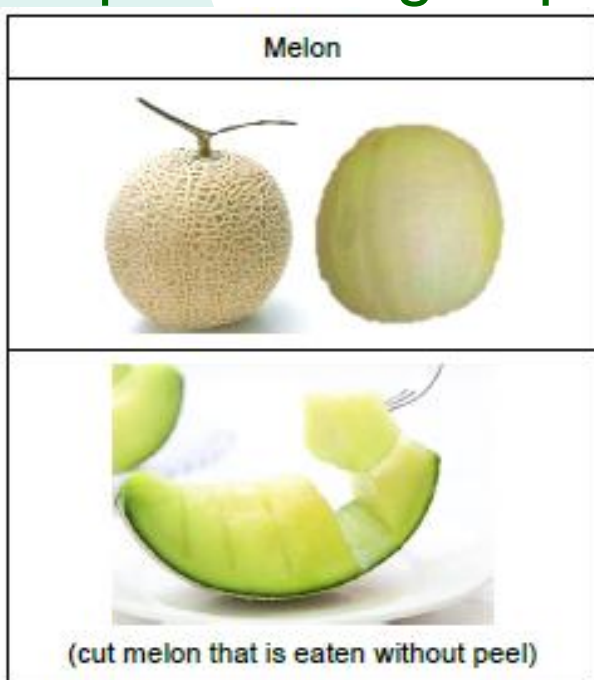
Crop (Variety)	Period of significant enlargement of fruit (days after flowering)	Time of harvest (days after flowering)	Fruit weight at harvest (g / fruit)
Cucumber (Tokiwa Hikari 3P)	3 – 15	10 – 12	100
Zucchini (Black Zucchini)	3 - 7	3- 5	100 – 300

Crop (Variety)	Period of significant enlargement of fruit (days after flowering)	Time when a fruit reaches full size (days after flowering)	Period when sugar ^a /starch ^b content of fruit increases (days after flowering)	Time of harvest (days after flowering)	Fruit weight at harvest (g per fruit)
Winter squash ⁴ (Ebisu)	< 25	25	25 – 40	40	1,800 - 2,500

(For further details, please refer to [CX/PR 15/47/7-Add.1](#))

Group 11 Fruiting vegetables, cucurbits - establishment of subgroup -

- Issues: whether the peels of fruits are edible (e.g. winter squash) or inedible (e.g. melon)
- Japan provided:
 - supporting pictures on differences in edible portions and processing required before consumption



(For further details, please refer to [CX/PR 16/48/8-Add.1](#))

Group 11 Fruiting vegetables, cucurbits - establishment of subgroup -

- Issues: whether the peels of fruits are edible (e.g. winter squash) or inedible (e.g. melon)
- Japan provided:
 - The explanatory text for insertion in the section of description of Group 11 for protecting consumer's health (as a compromise to classify melon and winter squash in the same subgroup)

“A number of varieties of winter squashes are eaten with peels, which needs to be considered in exposure assessment of these commodities to avoid underestimating the dietary intake of pesticide residues.”

Agreed by CCPR

(For further details, please refer to [CX/PR 16/48/8-Add.1](#))

Group 20 Cereal grains

- establishment of subgroup -

- Issues: whether to separate wheat and barley
- Japan provided data/information showing that:
 - Presence of husks during growing season and in traded commodities has significant impact on residue potential
 - ✧ For wheat, only kernels are distributed and traded
 - ✧ For barley, kernels with husks are distributed and traded (except some varieties)



(For further details, please refer to [CX/PR 16/48/9-Add.1](#))

Group 20 Cereal grains

- establishment of subgroup -

- Issues: whether to separate wheat and barley



- Japan provided data/information showing that:
 - Pesticide residue levels are higher in barley grains than those in wheat grains on the basis of analysis of the relevant residue data from JMPR Evaluations

Commodity	Use pattern					Supervised residue trials on crops					Codex MRL (mg/kg)
	Country	App. rate (kg ai/ha)	no.	BB CH	PHI (days)	Country	n	Residue data (mg/kg)	Range (mg/kg)	Median (mg/kg)	
Dicamba (extracted from 2010 JMPR Evaluation)											
Barley	US	0.14 (1st) 0.28 (2nd)	2		7	US	10	0.78, 1.1, 1.1, 1.5, 1.6, 1.6, 1.8, 2.7, 2.8, 5.0	0.78 - 5.0	1.6	7
Wheat	US	0.28 (1st) 0.28 (2nd)	2		7	US	20	0.05, 0.07, 0.08, 0.11, 0.11, 0.11, 0.16, 0.19, 0.19, 0.25, 0.29, 0.34, 0.35, 0.47, 0.53, 0.81, 0.84, 1.1	0.05 - 1.1	0.22	2

(For further details, please refer to [CX/PR 16/48/9-Add.1](#))

Group 20 Cereal grains

- establishment of subgroup -

- Issues: divergent opinions on whether to separate pseudocereals from other grains
 - Difference in botanical characteristics, growth habit, GAPs
 - No significant residue trials are expected for pseudocereals (minor crop)



- Japan proposed separating pseudocereals into two subgroups on the basis of whether or not the kernels are protected by husks during the growing season and whether or not the kernels are traded with husks
 - amaranth, quinoa → subgroup of wheat (without husks)
 - buckwheat → subgroup of barley (with husks)



Agreed by CCPR

(For further details, please refer to [CX/PR 16/48/9-Add.1](#))

Acknowledgement

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