



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
FAO/WHO COORDINATING COMMITTEE FOR ASIA
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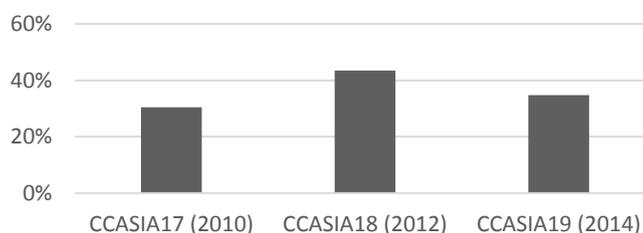
USE OF CODEX STANDARDS IN THE REGION

(Prepared by the Codex Secretariat)

BACKGROUND

1. Information on the national use of Codex standards and related texts was collected in the past via a circular letter and the information was utilised as the basis for discussion in all Regional Coordinating Committee (RCC) meetings.
2. In FAO/WHO Coordinating Committee for Asia (CCASIA) and other RCCs the reply rates to the circular letter were generally low (36 % on average as of 2010). In addition, members often made oral reports during sessions, which further complicated the analysis and the preparation of meaningful conclusions on the overall picture. As shown in **Figure 1**, replies to the question on the use and relevance of Codex standards and related texts (hereafter “Codex standards”) over the past five years have never exceeded 43 percent of the CCASIA membership. At CCASIA19 for example, only six out of a possible 23 members replied to the circular letter while two more submitted relevant information as conference room documents, constituting an overall response rate of only 35 percent.

Figure 1: Percentage of CCASIA members that informed about the national use and relevance of Codex standards in writing



3. After the discussion on the revitalization of the RCCs it was decided to terminate the use of the circular letter and to replace it with a system to continuously collect data online for all six Coordinating Committees. As an initial step towards a more systematic approach to the questions on the use of Codex standards and in an attempt to enhance the related data collection system, the Codex Secretariat developed a survey in cooperation with FAO and WHO for distribution to all RCCs. In the case of CCASIA, the survey was sent out on 22 March 2016.
4. The survey was conducted online using the software SurveyMonkey which allows for easier data analysis and representation. A separate translation in Chinese was also made available and members were given a period of two months to provide answers.
5. Given that questions on the general use of Codex standards had in the past not led to any comparable or representative data it was decided to focus on specific standards that would be widely known and representative for their respective categories (i.e. numerical standards, general subject standards and general principles). Based on this assumption the survey covered:
 - i. The use of Maximum Residue Levels (MRLs) for pesticides in food and feed;
 - ii. The use of three general subject standards (Food Additives STAN 192-1995, Contaminants and Toxins in Food and Feed STAN 193-1995, Labelling of Prepackaged Foods STAN 1-1985); and
 - iii. The use of General Principles of Food Hygiene (CAC/RCP 1 -1969).

In addition, members were asked about difficulties related to the general use of Codex standards and were informed that other specific standards could be covered in future rounds to build up over time a representative data set on the use of Codex texts worldwide.

ANALYSIS AND DISCUSSION SURVEY RESULTS

6. The survey on the use of Codex standards obtained a response rate of 61 percent (14 countries) in the Asia region (as of June 2016). **Figure 2** marks all respondents in the region in black.

Figure 2: Geographic overview of respondents to the 2016 survey on use of Codex standards



7. The full survey results can be found in Appendix I and a summary in the following.
- i. *Use of Codex MRLs for pesticides in food and feed*: Around half of the respondents stated that they apply or are in the process of adopting Codex MRLs for all pesticides regulated or registered in the country. The other half uses Codex MRLs at least for some of the pesticides regulated in the country.
 - ii. *Use of the General Standard for Food Additives (Codex STAN 192-1995)*: The technical content, structure and wording of the national regulation(s) are in over 60 percent of the responding countries comparable to the Codex standard or only contain minimal editorial changes for the regulated additives. The remaining respondents answered that they have partially adopted the standard, which means that only parts of their national standards or regulations are identical with the Codex standard or that their national texts contain some technical deviations from what is stipulated in the Codex standard (e.g. for some additives).
 - iii. *Use of General Standard for Contaminants and Toxins in Food and Feed (Codex STAN 193-1995)*: The standard is fully adopted by over 70 percent of the respondents. The remaining countries have partially adopted the standard.
 - iv. *General Standard for the Labelling of Pre-packaged Foods (Codex STAN 1-1985)*: As in the case of 7(iii), the standard is fully adopted by over 70 percent while the rest of respondents have a partial adoption of the standard in place.
 - v. *Use of General Principles of Food Hygiene*: All survey respondents have national legal requirements for good hygienic practices related to food and have aligned their legislation with the Codex General Principles of Food Hygiene (CAC/RCP 1-1969). While around 40 percent also require the application of the Hazard Analysis and Critical Control Point (HACCP) system in their country and align their respective legal requirements with Codex provisions (i.e. Annex 1 to CAC/RCP 1-1969), the remaining 60 percent of the respondents have optional or no implementation of the HACCP system.
 - vi. *Difficulties with regards to the use of Codex provisions*: Around half of the members of the Asia region have identified their biggest difficulties with regards to the use of Codex standards and related texts. These can be group as follows:¹
 - (1) too high resource investments combined with unavailability of local implementation capacity;
 - (2) adaptation of Codex standards to the national context/reality;
 - (3) duration of the Codex standard development and implementation process which sometimes leads to a decrease in the relevance of the final product;

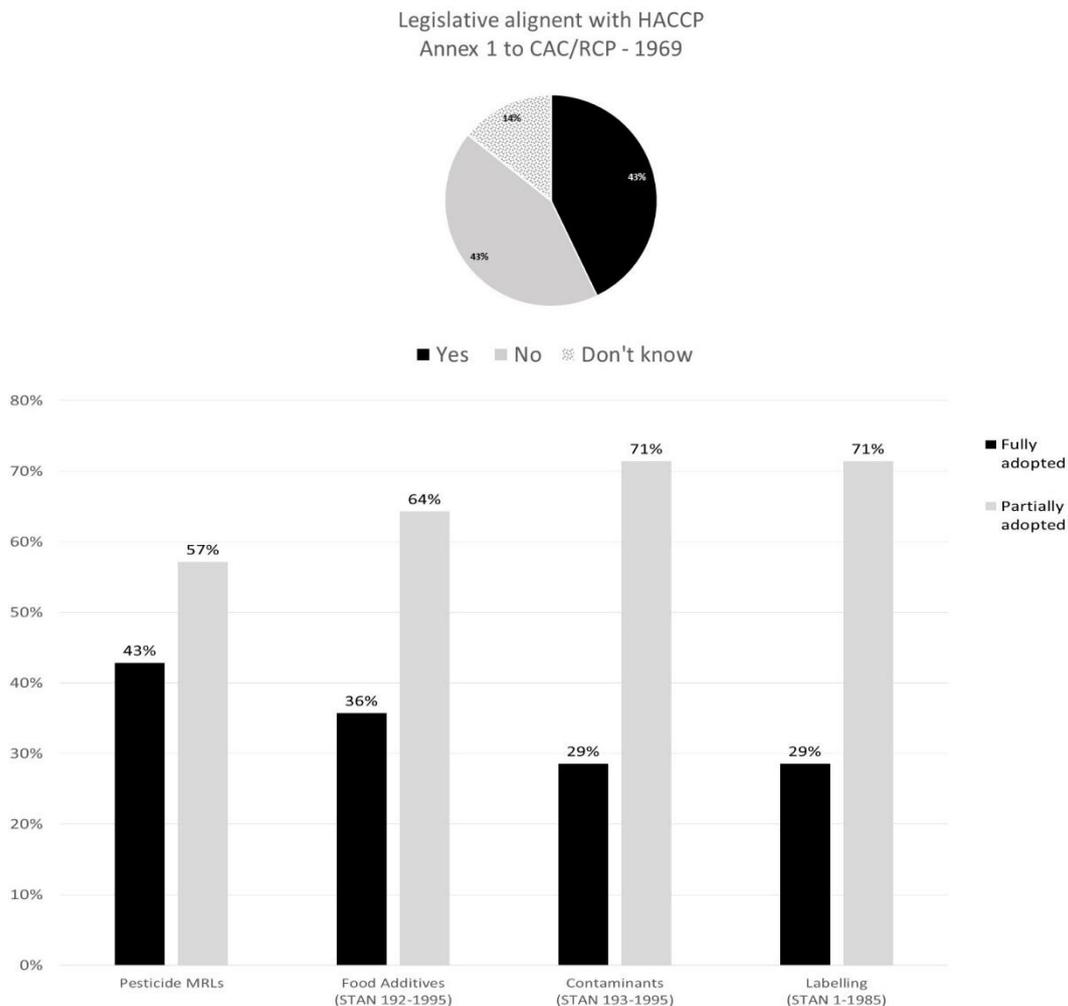
¹ Points (1) – (3) are difficulties stated by more than one country, while points (4) – (6) are only stated by one country each.

- (4) a lack of basic national food safety laws;
- (5) the challenge to catch up with frequent changes in Codex MLs and MRLs; and
- (6) a lack of awareness of Codex provisions in the industry (particularly primary production).

8. Overall, the survey on use of Codex standards obtained a high completion rate of 61 percent and respondents generally judged the survey as easy and well explained. The survey results are thus considered representative for the Asia region.

9. Codex general principles for food hygiene are broadly used in the region. As far as the application of the HACCP system is concerned, 43 percent of respondents have aligned their legislation with Codex provisions. Furthermore, members are either fully or partially adopting Codex provisions for pesticide MRLs, food additives, contaminants and toxins in food and feed as well as for labelling of pre-packaged foods. For the latter two standards full adoption is lowest (29 percent) as shown in **Figure 3**.

Figure 3: Use of Codex standards and related texts in Asia



10. The majority of difficulties regarding the use of Codex standards in Asia relate to a lack of national resources and capacity. In addition, the duration of the standard development and the subsequent national implementation process in some cases lowers the actual relevance of the standard for the recipient country.

CONCLUSIONS AND RECCOMENDATIONS

Conclusion

11. The survey results indicate that in the CCASIA region, the national food legislations of members are aligned to the Codex General Principles of Food Hygiene and legal requirements related to Good Hygienic Practices exist. However, there are varying degrees of adoption of other horizontal standards on food safety and consumer protection (i.e. labelling of pre-packaged foods, general standard for contaminants and toxins in food and feed; general standard for food additives and MRLs for pesticides).

Recommendation

12. The survey provides useful information that could support future national assessments and actions in the region. CCASIA is requested to take note of the results of the survey and to provide inputs on the following questions that could guide future action by the Codex Secretariat in this area:

- (a) *Format and approach*: Are you satisfied with the design of the survey? Do you agree with the approach chosen and explained in paragraph 5?
- (b) *Use of the results*: Do you consider the results useful? If so, would you like to have the information stored online (i.e. embedded in the Codex website) providing an opportunity to update national information and review the information of other countries?
- (c) *Scope of next survey*: Which areas of Codex work would you like to see covered in future (if any)?

APPENDIX I – SURVEY QUESTIONS AND ANSWERS**Question 1. To what extent are Codex MRLs for pesticides in food and feed adopted in your country?**

Fully adopted	6	43%
Partially adopted	8	57%
Not used at all	0	0%
don't know	0	0%
	14	100%

Question 2. Please use this field to provide any additional comments or explanations (max. 100 words).

The Codex MRLs are actually used in almost all regulated pesticides in food and feed in the country. There is a government agency that handles this specific concern. However it is not appropriate to say full adoption at this stage.
Pesticides are been evaluated by a committee to adopt the standards
officially we have not yet adopted the standard, but we refer to codex standards and we are in the process of adapting the standard
Some of the MRLs have been adopted, and the process is ongoing at the moment. However we are establishing the MRLs based on our domestic situation.
In the phase of the implementation, the analytical methods for the MRLs are very important. Recommendations of the analytical methods accompanying with the MRLs will be very useful.
Some Codex MRLs that have intake concern for the national population will not be adopted to be used as national MRLs.
Our country has adopted CAC/MRL_1 Maximum Residue Limits (MRLs) for Pesticides in 2008 as a national standard and has not updated since and CAC/MRL_2 Maximum Residue Limits for Veterinary Drugs in Food in 2009 as a national standard and also has not updated since then. CAC/MRL_3 Extraneous Maximum Residue Limits (EMRLs) has not adopted

Question 3. To what extent is the General Standard for Food Additives (CODEX STAN 192-1995) adopted in your country?

Fully adopted	5	36%
Partially adopted	9	64%
Not used at all	0	0%
don't know	0	0%
	14	100%

Question 4. Please use this field to provide any additional comments or explanations (max. 100 words).

There are some food additives which are not registered with the country's Food and Drug Administration and therefore, are not adopted.
Additives relevant to our country are been adopted
Methods of analysis and sampling and food labelling have been fully adapted and food additives, contaminants in food and feed and nutrition and foods for special dietary use are in the process of adaptation.
In case of food additives in which the exposures exceed the ADI, especially, sweeteners, colours, and preservatives, we establish our own MLs.
We have initially adopted General Standard for Food Additives in 2007 and updated on 2015.

Question 5. To what extent is the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) adopted in your country?

Fully adopted	4	29%
Partially adopted	10	71%
Not used at all	0	0%
don't know	0	0%
	14	100%

Question 6. Please use this field to provide any additional comments or explanations (max. 100 words).

Some national MLs are equivalent to Codex MLs while some other MLs are established using Codex MLs as a guideline.

We have initially adopted General Standard for Contaminants and Toxins in Food and Feed in 2007 and started updating but has fully adopted yet.

Question 7. To what extent is the General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985) adopted in your country?

Fully adopted	4	29%
Partially adopted	10	71%
Not used at all	0	0%
don't know	0	0%
	14	100%

Question 8. Please use this field to provide any additional comments or explanations (max. 100 words).

There are some specific provisions that are not applicable to the country and therefore not included in the national regulations

Labelling and advertising regulation is in force

We have included some extra points relevant to our national requirements and adapted this standard.

The part of "date marking" should be stated more clearly.

Some provisions are different from our national standard for labelling.

Country has adopted General Standard for the Labelling of Prepackaged Foods in 2007 as a national standard but has not updated since then

Question 9. Do you have legal requirements for good hygienic practices (GHP) related to food in your country?

Yes	14	100%
No	0	0%
Don't know	14	100%

Question 10. If yes, is your legislation aligned with the General Principles of Food Hygiene (CAC/RCP 1 -1969)?

Yes	14	100%
No	0	0%
Don't know	0	0%
	14	100%

Question 11. Do you have legal requirements for the application of the Hazard Analysis and Critical Control Point (HACCP) system in your country?

Yes	6	43%
No	8	57%
Don't know	0	0%
	14	100%

Question 12. If yes, is your legislation aligned with the HACCP system and guidelines for its application (Annex 1 to CAC/RCP 1 -1969)?

Yes	6	43%
No	6	43%
Don't know	2	14%
	14	100%

Question 13. Please use this field to provide any additional comments or explanations (max. 100 words).

HACCP implementation is optional.
We do have HACCP requirements as a voluntary standard for the food business operators who are willing and ready to implement.
We have approved new Food LAW and Food SAFETY LAW in 2012 and it has sanctioned that any food producers must implement good practices starting from January 2014. Accordingly we have developed regulations of implementing good practices and based on Codex texts. We have adopted General Principles of Food Hygiene standard in 2003 as a national standard. Several good practices standards are adopted as a national standard, however, there is a need to update it and adopt remaining standards.

Question 14. Where do you see the biggest difficulties with regards to the use of Codex standards and related texts?

Not all codex standards and related texts can be applied to the national context
To integrate Codex standards in local context
The requirement of translating Codex standards being voluntary to be adopted as mandatory regulatory standards. The process required delays immediate implementation. Too high resource investment.
Partially developed food control system
Lack of food law in the country
The Codex standards and related texts sometimes do not match the domestic standards/situation. They may sometimes be more stringent than the existing standards with respect to the contaminants and pesticides. In case of commodity standards some of the provisions are not practically implementable and therefore cannot be enforced as such.
Some of the Codex standards were developed in the last century and among them, several standards need to be updated. Besides that, the long process and speed of food standard development might prevent the widely utilization of the Codex standards.
Related texts not sufficiently responding to national needs
Unavailable human resource skills
The cost of implementation is the biggest difficulties in the use of Codex text since the practices. For example, HACCP requires the personnel who understands the principles and willingness to improve of the food business operator.
The process of development of Codex standards are slow. Number of commodity standards are limited. The MLs and MRLs provisions change frequently
Lack of awareness on Codex standards and texts in primary production and most of the time too high resource investments derives; Lack of human and financial resources for adequate implementation; Lack of national scientific data; Language difficulties when translating.

Question 15. Please use this field to provide any additional comments on the use of Codex standards and texts (max 100 words).

Codex standards are very useful as a reference standards, however sometimes the standards may not be acceptable to the industry so government has to make compromises to be able to implement mandatory regulatory standards effectively. Codes of practice seem to be general and sometimes interpretation of the written guidelines differ from among the regulators.

Codex standards and texts are used. However no system is developed to do risk management approach.

Question 16. Were the survey explanations and choices adequate for you to answer the survey questions?

Yes	13	93%
No	1	7%
Don't know	0	0%
	14	100%

Question 17. On a scale of 1- 5 how difficult was it for you to answer this survey (1 being very easy, 5 very difficult)?

1	2	3	4	5	Total
1	10	2	0	1	14