COMMON ISSUES UNDER DISCUSSION ACROSS DIFFERENT CODEX COMMITTEES

Background

Of late, working of the Codex has assumed greater importance especially for the developing countries like India because of the hidden agenda of some of the developed countries to some how reduce access to their market. In almost all the Codex Committees, there are number of areas/issues of India's export or import interest that need to be articulated appropriately. India has been participating in meetings of various Codex Committees and composition of the Indian delegation has been based on the involvement of various officials in the related work. Quite often the members of the delegation have not been aware of discussions taken place in our Codex Committees. Resultantly, similar issues discussed in other committees are not within the domain of knowledge of such officials. Moreover, basic issues such as *"Appropriate Level of Protection (ALOP)"*, *"Principles of Risk Analysis"*, *"Traceability"*, *"Precautionary principle"*, etc., which have been discussed in CCGP meeting and have implications in other Codex Committees need to be known to officials participating in such committees. It has also been observed that the process of finalisation of India's comments for participation in different committees is not being uniformly applied across different Shadow Committees. With this in view, it has been felt necessary that a paper should be prepared covering issues, which have implications across different Codex Committees. It is expected that this paper should help in the understanding of certain positions that have been taken by India especially in the core committees like CCGP, CCFH, CCFICS, CCFAC, etc. and the approach taken by India. It is necessary that the Indian position on policy issue taken in one Codex Committee should get reflected in the other. While it may not be possible to cover all horizontal issues in this paper, an attempt has been made to cover all the major issues.

1) Working of Shadow Committees

A manual has recently been prepared by the National Codex Contact Point in the Ministry of Health spelling out the terms of reference and the steps that need to be taken by the various Shadow Committees. It became necessary because different Shadow Committees have been

working in different directions. Some of them initiate preparatory work only a month or two before the meeting of the Codex Committee. It is necessary for the Shadow Committees to evaluate areas of priority for India well in advance and see how these can be brought into the agenda of the committee. Interaction with other related Govt. organisations and trade bodies is necessary before any views are presented in the Codex Committee meeting. Consideration of any data that has been generated or needs to be generated which is relevant to the particular issue also need to be evaluated before a position is taken in the Codex Committee.

Some others do not carry out regular follow up on action points which are required to be completed before the next Codex Committee meeting or for sending interim comments to Working Groups or Drafting Groups which get formulated during the course of the meetings. In certain cases minutes of the Shadow Committee meetings are not prepared and some times the delegation does not even submit its report. It is necessary that the chairman of different Shadow Committees personally ensure that the terms of reference specified in the manual are followed and the procedures mentioned above are meticulously followed. This would bring about continuity in the working of the committee even though the dealing officials might have got transferred. In this context, it is important to assign specific tasks to members of the Shadow Committee and the identified members of the Indian delegation. There may be need to collect data, interact with trade and industry, research departments, State Govts. and laboratories before finalising the comments. This process would involve a few months of preparation and, therefore, needs to be started at least 6-8 months before meeting of the Codex Committee. Institutions like NIN, ICAR, ICMR, CFTRI would need to be consulted and associated on a regular basis for information collection and interpretation. There is also a need to identify resource persons in all such organisations for the sake of continuity and focus.

2) Principles of Risk Analysis

There are four basic subsets of this principle. These are risk identification, risk assessment, risk communication and risk management. It has been understood under the SPS Agreement and, therefore, in the Codex working that protections instituted by different countries should not exceed the "*appropriate level*" and should be based on the four principles of risk analysis. In this context, it is clear that protection should be with respect to a particular identified risk and should not exceed the level necessary to overcome that risk.

Further, there should be no negative trade effects, the options available should be technically and economically feasible and special attention would need to be given to the conditions prevailing in developing countries. In doing so the technical and economic needs of these countries would have to be addressed to achieve the appropriate level of protection. During the CCGP meeting in 2001, India presented a paper on the procedure that should be uniformly followed by the Codex while elaborating a product standard. These steps are outlined below and most of these components have already been incorporated in the draft principles of risk analysis currently under discussion in the CCGP. It is necessary that the different Shadow Committees should understand this broad structure and efforts should be made that these steps do get followed during discussions at the Codex Committee meetings.

(a) The risk assessment exercise should be initiated by an expert committee, such as JECFA, JMPR or a consultation group, etc., concerned with human health and food safety at the stage, when a new subject is taken up for consideration by a codex committee.

(b) The step for collection of data from all the member countries to carry out risk assessment should be made a part of the standard setting procedure. This data should include epidemiological surveillance information and exposure studies. For the sake of convenience, a proforma for providing data could be provided and a time frame could be stipulated for this purpose.

(c) The data submitted by member countries should specify the method of sampling followed for collection of samples and also clearly specify the method of estimation and their detection level.

(d) The traditional/cultural practices, economic feasibility of the risk management options in developing countries and the need for flexibility in establishment of standards, guidelines and codes should be taken into consideration.

(e) Before completion of the risk assessment exercise, the data should be circulated to member countries and an opportunity be given to them to comment.

(f) For collection of data and attending meetings where risk assessment studies are considered, funds should be made available to developing countries.

The exact wordings of relevant paras relating to "W*orking Principles of Risk Analysis*" as incorporated in the document at our instance during the CCGP meeting held in 2002, are as follows :

Para 10 – When there is evidence that a risk to human health exists but scientific data are insufficient or incomplete, the Codex Alimentarius Commission should not proceed to elaborate a standard but should consider elaborating a related text, such as a code of practice, provided that such a text would be supported by the available scientific evidence.

Para 12 - The needs and situations of developing countries should be specifically identified and taken into account by the responsible bodies in the different stages of the risk analysis process.

Para 19 – Expert bodies and consultations should ensure effective participation of experts from different parts of the world, including experts from developing countries.

Para 23 – Risk assessment should seek and incorporate data from different parts of the world, including that from developing countries. These data should particularly include epidemiological surveillance data and exposure data. Where relevant data are not available from developing countries, the Commission should request the FAO/WHO to initiate time-bound studies for this purpose. The conduct of the risk assessment should not be inappropriately delayed pending receipt of these data; however, the risk assessment should be reconsidered when such data are available.

Para 30 – The Codex Alimentarius Commission and its subsidiary bodies, acting as risk managers, in the context of these Working Principles should ensure that the conclusion of the risk assessment is presented before making final proposals or decision on the available risk management options, in particular in the setting of standards or maximum levels, bearing in mind of the guidance given in para 10.

Para 36 – Risk management should take into account the economic consequences and the feasibility of risk management options. Risk management should also recognize the need for alternative options in the establishment of standards, guidelines and other recommendations, consistent with the protection of consumers' health. In taking these elements into consideration, risk managers should give particular attention to the circumstances of developing countries. One of the best examples of developing countries successfully having the revised limits of

aflatoxin M_1 in Milk fixed. The details of which have been included in Codex Evaluation Report.

3) Principles and Guidelines for the Conduct of Microbiological Risk Management

The document, under discussion in CCFH, has been drafted by a working group led by France and takes into account issues like Appropriate Level of Protection, Food Safety Objectives and the Precautionary Principle. All these issues have been under major discussion in CCGP.

India has, generally, been of the view that economic consequences and feasibility of risk management options in developing countries must be taken into account. It was also stated the guidelines should more thoroughly address other legitimate factors and promote fair trade practices.

In view of the fact that some of the issues are currently under debate in CCGP, the committee decided that the drafting group should reconsider the document and present it at the next CCFH meeting. With regard to the Guidelines for Implementation of Microbiological Risk Management decisions and Monitoring & Review, extensive revision of the sections was required.

With regard to India's viewpoint, there is, now, a change in the thinking with regard to the issue of fair trade practices. It is proposed to oppose the concept as it might cover issues like environment, labour etc., unless precisely defined. This may have to be kept in mind by Indian delegations participating in CCFH & CCGP meetings.

4) Elaboration of Codex standards should be based only on application of risk analysis.

The issue of application of risk analysis is presently under consideration in the CCGP, as a part of the Draft Working Principles for Risk Analysis (Draft is currently at Step 3). It came up for consideration in the 16th Session of CCGP. The CAC mandated CCGP to complete the Proposed Draft Working Principles for Risk Analysis within Codex as a high priority for adoption in 2003. In 17th Session of CCGP, in April 2002, India's paper on Criteria for application of risk analysis in elaboration of Codex standards was considered.

India raised this issue also in the 13th Session of the Regional Coordinating Committee for Asia, held in September 2002. This issue is relevant to other Codex Committees like CCFFP, CCPFV that establish the levels of food additives/contaminants in food commodities. It is also a core issue for CCFAC, CCPR & CCRVDF that establish the levels for food additives & contaminants, based on the evaluation/toxicology carried out by JECFA & JMPR. India has generally maintained that fixation of very stringent limits more than the minimum necessary levels not based on risk analysis are against the spirit of the SPS agreement and, hence, not required.

There is a need for generating toxicological data and safety levels taking into account, the monitoring data on different food additives/contaminants and the geographic food consumption pattern through supervised trials. The data should be generated by the concerned institutes/organisations and regulatory agencies such as NIN, ITRC, ICMR, CFL, CFTRI and these organisations need to be entrusted with this job. The funding support for such studies would need to come from export promotion organisations, Ministry of Health, Ministry of Food Processing Industries, etc.

5) Precautionary Principle

This principle has application across all Codex Committees. The vision statement prepared by Codex Sectt. was discussed at the last CAC meeting (July, 2001). The document sought to achieve the highest attainable level of consumer protection through Codex working. A number of countries opposed the term "*highest attainable*" as this could lead to unnecessary non-tariff barriers. Finally, consensus was reached at the following formulation :

"*In case, where scientific data on risk is insufficient or incomplete, risk managers should not proceed to elaborate a standard but should consider elaborating a code of practice, provided that such a text is not supported by available scientific evidences*".

In spite of the above decision taken in the CAC meeting, the current trend of developed countries is to continue with the precautionary principle approach on the plea that the above decision is for the Codex working and not for member Govts. Moreover, the easy way out found is to adopt this principle by arguing that where data in quantitative terms is not available, then qualitative data should be taken into account. This approach is reflected in the most recent document on "*Draft Principles and Guidelines for the Conduct of*

Microbiological Risk Management" going to be discussed in the CCFH meeting in January, 2003. These approaches which are contrary to the spirit of the decision taken in CAC meeting will need to be opposed at all Codex meetings.

6) Fair Trade Practices and Other Legitimate Factors

These issues have been under discussion in CCFH meeting as well as in CCGP under the agenda item "*Working Principles of Risk Analysis*". Several delegations opposed inclusion of "*fair trade practices*" as its definition was not precise and, in any case, had no bearing on risk analysis. It was felt that this should be covered under "*other legitimate factors*" and would need to be taken into account in the course of the establishing an appropriate standard. The CCFH, therefore, agreed on a compromise text and came to the conclusion that all issues contained in the proposed paragraph were treated more precisely in other paragraphs and sections of the document, and, therefore, agreed to delete the paragraph.

7) Traceability

The subject of Traceability has been discussed in various committees such as CCFFP; Task force on animal feeding, task force on foods derives from biotechnology, CCGP, CCFICS, CCFH and the Executive Committee. In the EC meeting held in 2001, it was agreed to have term "*product tracing"* in the title rather than using the word "*traceability"*. The EC also agreed to mandate the subject to CCGP to consider traceability from two aspects, namely, having a food safety objective (SPS measure), and having a legitimate objective as a TBT measure.

This issue has also been under discussion in the CCFICS where the discussions were generally with regard to development of procedures for the application of traceability in the context of import and export certification of food products. The CCFICS set up a working group under Switzerland to develop guidelines with regard to traceability. Most of the members were of the view that this subject should first be discussed and concluded in the CCGP before taking up work under CCFICS. India has been of the view that if the principles of traceability get established under CCGP, then these would be applicable to all other Codex Committees across the board and may lead to complications. India, therefore, has been supportive of discussion within the framework of CCFICS so that it had a restrictive

role to food inspection and certification. During the CCGP meeting in April, 2002 it was decided that the Regional Committees should discuss this matter and present their views to the Codex Sectt. which would then prepare a paper for discussion at the next CCGP meeting.

India participated in the CC-Asia meeting in September, 2002 where the Indian delegation took the position as approved the Ministry of Commerce and added that traceability should be considered on a case-to-case basis after taking into account the following five criteria:

(a) The nature and extent of risk has to be determined on the basis of a specific risk assessment and only after this assessment should a product be considered for traceability.

(b) There should be a clear demonstration of the fact that the related risk can be managed by the use of traceability and that there is no other feasible alternative to manage that risk.

(c) The extent of application of traceability in the value chain should be clearly listed out on the basis of the risk assessment, practical applicability and cost effectiveness.

(d) The cost benefit analysis should be worked out in advance before traceability is considered for a particular product.

(e) There should be clear demonstration of the fact that this principle will not be used as a technical barrier to trade.

It was also stated that there was a need to examine whether traceability was at all required as all the countries and Codex Committees had an in-built procedure to recall products from the market in case found to be injurious to human health. The delegation added that the code of traceability should be well defined and it should be applicable to only to processed foods and should exclude primary foods and processes. Further, it should be required only for the purposes of recall as a management option and the manner of implementation should be left to the regulatory authorities of the exporting country in such cases whether the food has been found to have caused a health hazard.

There was no opposition to the Indian viewpoint. The Codex Sectt. appreciated India's comments and mentioned that there were several elements in the Indian paper which could be used by the Sectt. for preparing a paper on traceability for discussion at the next CCGP

meeting. India would need to take uniform position in all Codex meetings where the subject of traceability is to be discussed.

8) Involvement of International Inter-Governmental Organizations, UN/ECE, etc.

This matter has been under discussion in CCGP and CCFFV meetings where has been a move for involvement of group of countries forming an organization with a view to generate support for issues of interest to certain countries. With regard to fresh fruits and vegetables, the CCFFV-2002 and CAC-2001 endorsed the view of Executive Committee that CCFFV was recognized as the international body responsible for drafting standards for fresh fruits and vegetables. They emphasized the need to draw upon and develop on the experience and expertise of specialized bodies in this field. CCFFV-2002 expressed the view that Codex and UN/ECE should continue to cooperate and coordinate work on fresh fruits and vegetables without duplication of efforts.

Article 1(b) of the Procedural Manual provides for a general framework for co-operation with other international standardization organizations in line with this, the work on elaboration of guidelines for co-operation with international inter-governmental organizations was entrusted to CCGP. During the meeting of CCGP-2002, Malaysia expressed the view that the interpretation of Article-1(b) should not be construed as allowing work to be undertaken by bodies other than Codex subsidiary bodies, not even at Step-2 as it would result in an unnecessary burden on developing countries. The delegation drew attention of the Commission that it was main body responsible for elaborating international food standards. Many delegations supported this view. In this meeting, India highlighted the critical nature of disadvantages over the advantages. India pointed out the burden on developing countries due to limited resources and added that it would also increase the workload on technical agencies and Codex authorities at national level and the co-ordination required between them. The Secretariat suggested that necessary amendments to the Uniform Elaboration Procedure contained in the Procedural Manual. This was however, not agreed to by the Committee which accepted that this stage was premature. Since, some delegations felt that the standards developed by inter-governmental organizations could be used as reference only at step-3 not beyond that, the Secretariat was requested to draft specific guidelines to define more precisely the modalities of co-operation between CAC and other international inter-governmental and non-governmental organizations for elaboration of standards and related texts.

India would need to examine the guidelines and take a view, as it would have a bearing on standards to be applied for export purposes.

9) Code of Hygienic Practices for Primary Production of Fresh Fruits and Vegetables

This code is a subject of discussion in CCFH and CCFFV. One of the paras of the code states that contamination through direct or indirect means should be avoided. India's position has been that contamination only through direct contacts should be stated in the code. This is because of the working conditions in developing countries where some contamination through indirect means cannot be avoided. The CCFH decided that the code should be aligned with "Recommended International Code of Practice General Principles of Food Hygiene" which uses the phrase, "*those who come directly or indirectly into contact with food"*. In view of the prevailing conditions in developing countries and also in India, we should argue against it. This issue will come up for adoption at step 8 at the CAC session in 2003. In case, it gets adopted, it will also get adopted in CCFFV and will have a bearing on trade in fruits and vegetables.

10) Code of Practice for Quality Inspection for Fresh and Vegetables

This code has been under discussion in CCFFV and Canada is redrafting the document for discussion. However, the previous drafts have been discussed and the Committee noted that most of the aspects contained in the code are covered by different texts elaborated by CCFICS. Because of this, the Committee decided to discontinue the consideration of the main body of the draft code. However, the Annexes – I to IV are being redrafted by Canada, and in doing so it would take into account aspects covered under texts elaborated by CCFICS and international organizations involved in the elaboration of texts concerning the quality inspection and certification of fresh fruits and vegetables (UN/ECE, OECD, ISO).

The Indian delegations working on CCFFV and CCFICS will have to study the codes together to identify if there are any inconsistencies or are against the general positions taken by India on such issues.

11) Code of Hygienic Practice for Fish and Fishery Products

(a) This code was under discussion in three Codex Committees, namely, CCFH, CCFFP as well as CCGP. Its relationship with CCGP is in the context of traceability. According to Norway, traceability of products up to the catch area was not impractical. The CCFH, under which the code has been drafted, has noted that traceability was important since the catch area could be within the contaminated waters or from areas where regulations concerning the use of veterinary drugs could differ from other areas. The CCFH generally endorsed the code. These comments will also be taken up for consideration in CCFFP.

(b) The draft code of hygienic practices for processing of quick frozen foods was discussed in the Codex Committee on Fish and Fishery Products (CCFFP) in June 2002 and has been forwarded to CAC for adoption in July 2003. However, discussion on important issues such as risk assessment of *vibrio cholerae* in shrimps and *vibrio parahaemolyticus* in oysters are likely to be concluded only in the next session of CCFH. In this context, there is a need to evaluate the document with respect to its impact on our economy. If adopted, our own regulations would need to be modified. India has participated in this meeting held in June 2002. However, report of the Indian delegation was not available due to which it was not possible to evaluate the comments made by the Indian delegation in CCFFP.

12) Code of Hygienic Practice for Milk and Milk Products

This code has been formulated by a drafting group led by USA and has been under consideration by CCFH. The code is being redrafted at Step –2. It will have implications in the CCMMP. In the CCFH meeting, many delegations supported combining of all three annexes into one document. India and South Africa opposed this approach stating that combining of the annexes will not enable accommodation of the diverse situations of small and large producers. The committee noted that more work was required to ensure consistency with the General Principles of Food Hygiene, proposed draft principles and guidelines for the conduct of microbiological risk management & other Codex standards.

13) Codex Guidelines for preservation of raw milk by use of lacto peroxidase system

Use of lacto peroxidase system for preservation is required when refrigeration facilities are not available. Under CCMMP, it was noted

that these guidelines were not intended for products entering in international trade. The matter was, therefore, referred to the Executive Committee (EC) to decide on the need for revision of the

guidelines under Codex or outside the Codex and, if so, which body should do it. In the EC meeting of Codex, it was decided to ask CCFH to consider this matter. The EC also noted that the initial evaluation by JECFA covered the process, but that the chemical used would require a further evaluation. Therefore, it asked JECFA to undertake a new risk assessment of lacto peroxidase system in order to ensure an updated scientific basis for further decision.

In view of the above, India would need to take a view whether to support development of such guidelines and permission to use such system for products moving into international trade and present the same in both CCFH as well as in CCMMP in a common manner.

14) Standards for fermented milk products

Under the issue of labeling regarding use of non-nutritional sweetness in milk products, India along with France, Italy and EC raised the issue of indication of non-suitability of such sweeteners for children and persons with specific disorders on the labels. This matter is common to both CCFL and CCMMP.

15) Maximum limit of lead in butter

This is a subject of discussions in CCMMP & CCFAC. A maximum level of 0.05 mg/kg of lead has been adopted. However, due to an observation made by the Indian delegation and the request of Codex Alimentarius Commission to re-evaluate the level of lead in milk fat, the CCMMP decided to delete the maximum level in milk butter. The CCFAC has, however, decided to request comments from member countries on the need for a separate maximum level for lead in milk fat. The Shadow Committees would need to keep track of developments on this issue with mutual consultation.

16) Model Export Certification for Milk & Milk Products

In the CCFICS meeting it was brought out that while the animal and plant health status attestation may be contained in the export certification, there was no need for specifying the health requirements

in the document as these are contained in the OIE/IPPC guidelines. India also took this view. On similar lines, under CCMMP, India may propose deletion of animal health requirements in the export certificate.

17) Method of sampling for Aflatoxin in groundnut.

This issue was under consideration in CCMAS and CCFAC. Since the report of Indian delegation for participation in CCMAS 2001 was not available, it was not possible to understand what discussions took place in the meeting on this agenda. However, as per the Codex report of CCMAS, it seems that all lab samples obtained from the aggregate sample would need to be examined. The Indian suggestion of dividing the aggregate sample into two sub-samples of 10 kg each and be separately homogenised (sub-samples to be analysed and average to be taken to decide acceptance of the lot), was not agreed to. CCMAS expressed that such major change could not be considered at this stage as the Indian delegation had sufficient opportunity to present its views at the CCFAC.

This is a point which merits consideration. The lessons to be learnt here are that, firstly, the Indian delegation must be clear about what to say and what not to say. This should be based on elaborate discussion with the concerned trade agencies of the county including the private sector who are directly involved in business. Secondly, we need to keep ourselves alive to discussions taking place on the issue in other Codex Committees. Thirdly, we need to present our views at all Codex Committees where discussions on a same issue take place.

18) Maximum levels of Additives, Contaminants and Pesticides

Different product and other Codex Committees (CCFAC, CCPR, etc.) have been discussing maximum levels of additives, contaminants (metallic, microbiological, etc.) and pesticides in food products. Some of the items drawing major attention are levels of Aflatoxin, Ochratoxin, Patulin, lead and cadmium. The Shadow Committees where such issues are being considered must meet together to consider levels of such items and adopt a common approach for discussion at the Codex Committees. During such discussions, officials of NIN, ICMR, ITRC and CFTRI must be invited so that views

can be finalised. Meetings on these issues must be held at regular intervals.

19) Issues relating to labeling of food products

Issues relating to labeling have a bearing on all different products and their standards covered by different Codex Committees, more importantly, CCFL. Therefore, in this paper the major issues are being listed below for common understanding and applicability in other Codex Committees. These are as follows :

(a) Labeling of GM Foods : There has been a lot of discussion on the terminology to be used in case of GM foods. The Cartagena Protocol suggested use of the term "*Modern Biotechnology*" whereas many countries were of the opinion that the words "*Foods derived through certain technologies of genetic modification/genetic engineering for Foods & Food Ingredients*" should be used as these are not equivalent to conventional foods. India has taken the position that there should be comprehensive labeling and all foods derived from biotechnology or the ingredients derived from biotechnology be labeled as such. The words "*modern biotechnology*" may not be well understood by the consumers. India is also of the view that such labeling should be mandatory.

(b) Nutritional Labeling : There has been a general view of different countries that nutritional labeling should provide information on the following :

- Carbohydrates
- Dietary fiber
- Proteins (The proposal is to indicate source of protein, eg. fish protein, wheat protein, etc.)
- Fat content of which saturated, trans fatty acids and poly unsaturated fats be indicated separately (information on trans fatty acids should be given where a claim is made about the cholesterol or poly unsaturated fatty acid content)
- Sodium, Potassium, etc.
- Minimum energy value

Codex provides different levels of nutrients to claim that a product is of low, medium or high nutritional value. India's view is that disease and diet relationship should be established to support claims. The words "*reduction of disease on risk factors claim*" is also under discussion. India needs to formulate its final view as soon as possible.

(c) Class Names : There was a proposal that a product containing minimum 30% or 35% milk protein should be labeled as "*Milk protein product*" and a product containing 50% or more milk protein should be labeled as "*milk protein*". It was also to be considered whether "*coagulating enzymes*" should be treated as a separate class because some of these may be derived from GMO (e.g., rennet). It was, however, decided not to have separate class names. India's view is to have a single class of a milk product with a minimum level of 30% milk protein.

(d) Quantitative Declaration : The proposal is that a food product containing 5% or more of an ingredient must give the percentage of the ingredient used. Many countries are not in favour of this in view of its analytical problems, etc. India's view is that providing of the Quantitative Ingredient Declaration (QUID) will be a inhibiting factor to product innovation.

(e) Vegetarian Labeling : The issue is whether products of vegetable origin be labeled as vegetarian. A special task force was constituted for the purpose with South Africa and India as the members. In view of the difficulty in defining the term "*vegetarian*" (whether milk and milk products are vegetarian foods), the task force decided to dispense with vegetarian labeling.

(f) Labeling of Allergens : The proposal is to mention categorically certain ingredients, which may be allergic to human beings, on the labels. Examples of such allergens are refined peanuts, Soya beans and addition of sulphites. India needs to formulate its views on this issue.

(g) Organically Produced preparations : Homeopathic preparations were included in the permitted list of substances for use in organic agriculture but Ayurvedic products were not included. Potential use of Ayurvedic preparations in organic agriculture (Neem, etc.) needs to be stressed. Further, the Codex Committee on Food Labeling has proposed certain criteria to include new

substances in the permitted list for organically produced foods. The criteria and list need to be reviewed and updated by India.

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