



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON CONTAMINANTS IN FOODS**

**Eleventh Session
Rio de Janeiro, Brazil, 3 – 7 April 2017**

To be held at the Windsor Marapendi Hotel, Rio de Janeiro, Brazil

**MATTERS REFERRED TO THE COMMITTEE BY THE CODEX ALIMENTARIUS COMMISSION AND/OR
ITS SUBSIDIARY BODIES**

Comments submitted by EU, Kenya and AU

EU

**Proposed Draft Regional Standard for Fermented Cooked Cassava Based Products (§18 and §19 of
CX/CF 17/11/2)**

Hydrocyanic acid

The EUMS are of the opinion that before being able to take an informed decision on the request to the existing maximum level (ML) of 2 mg/kg for hydrocyanic acid in gari to cover also fermented cassava-based products or to consider whether another ML could be developed for these products, it is necessary to have information on:

- the occurrence of hydrocyanic acid in fermented cassava –based products; and
- the influence of fermentation and cooking process on the levels of hydrocyanic acid (levels of hydrocyanic in fresh cassava, in peeled cassava, after fermentation and after cooking).

Therefore, it would be appropriate to elaborate a discussion paper containing this information.

Mycotoxins

The EUMS are of the opinion that it would be appropriate to elaborate a discussion paper containing all available information as regards presence of mycotoxins in cassava and cassava-based products in order to be able to take an informed decision on the appropriateness to consider the establishment of an ML for certain mycotoxins in cassava.

The EUMS have few data on the presence of mycotoxins (aflatoxins, ochratoxin A, ergot alkaloids, alternaria toxins, several *Fusarium* toxins) in cassava and cassava-based products. No mycotoxins were found to be present in quantifiable levels.

Matters arising from the Committee on Fats and Oils (CX/CF 17/11/2-Add.1)

The European Union (EU) considers that the maximum levels for arsenic and lead for edible fats and oils as listed in the General Standard for Contaminants and Toxins can be applicable to fish oils. The EU is not aware of specific problems related to arsenic and lead in fish oils.

However, in relation to arsenic, the EU considers that the notes / remarks applicable to husked rice and polished rice¹ could be added for edible fats and oils specifying that these would be applicable for fish oils.

¹ "The ML is for inorganic arsenic (As-in).

Countries or importers may decide to use their own screening when applying the ML for As-in in rice by analysing total arsenic (As-tot) in rice. If the As-tot concentration is below the ML for As-in, no further testing is required and the sample is determined to be compliant with the ML. If the As-tot concentration is above the ML for As-in, follow-up testing shall be conducted to determine if the As-in concentration is above the ML."

KENYA**A. MATTERS ARISING FROM THE CODEX ALIMENTARIUS COMMISSION****MATTERS FOR ACTION**

FAO/WHO Coordinating Committee for Africa

Proposed draft Regional Standard for Fermented Cooked Cassava Based Products

Section 4 – Contaminants: The Coordinating Committee:

Hydrocyanic acid

(i) considered whether the existing provision for maximum levels of hydrocyanic acid content for gari in the GSCTFF (i.e. 2 mg/kg as hydrocyanic acid in the free-state) was applicable to fermented cooked cassava based products.

(ii) was explained that while both gari and fermented cassava-based products are derived from cassava, their production processes were different. Fermented cassava-based products were foodstuffs obtained from fresh cassava roots which are peeled, cut, dipped in water for fermentation for 3 to 5 days, then pressed prior to packaging into natural leaves and finally cooked. Sometimes, for commercial reasons, the fresh packaged products are stored at freezing or deep-freezing temperature before cooking which would extend the shelf life (from 3 to 6 months).

(iii) agreed to request the CCCF to consider if the existing maximum levels for hydrocyanic acid in gari (less than or equal to 2 mg/kg as hydrocyanic acid in the free state) could be extended to fermented cassava based products and if so, to consider extending this ML to cover also fermented cassava-based products or to consider whether another ML could be developed for these products.

COMMENTS

*We propose that the maximum level for hydrocyanic acid for gari can be adopted for **Proposed draft Regional Standard for Fermented Cooked Cassava Based Products pending further data from JECFA. The CCAFRICA members to submit the data to JECFA for analysis within one year, if need be.***

GEREAL COMMENTS

Kenya would like to bring to your attention that the reason why we would prefer the maximum limits of hydrocyanic acid for gari (2 mg/kg as hydrocyanic acid) to be used in the Fermented cooked cassava based products is because there is very little difference between these products. All the products are from the Cassava, and fermented.

Gari and fermented cooked cassava based products definition :

Gari is the finished product obtained by artisanal or industrial processing of cassava tubers (*Manihot esculenta* Crantz). The processing consists of peeling, washing and grating of the tubers, followed by fermentation, pressing, fragmentation, granulation, drying if necessary, sifting and suitable heat treatment.1 Gari is presented as flour of variable granule size. It has a moisture content of 12% and yet **Fermented cooked cassava based** is defined as foodstuffs obtained from fresh cassava roots which are peeled, cut, dipped in water for fermentation for 3 to 5 days, then pressed prior to packaging into natural leaves and finally cooked with water content of 35% .

Mycotoxins

(i) noted that there were no established maximum levels for mycotoxins for this product in the GSCTFF. Some delegations expressed the view that there was no need to establish the MLs for this product as fermented cooked cassava based products were not susceptible to mycotoxin contamination, and that fermentation was one of the ways to reduce mycotoxins. It was further noted that mycotoxin contamination normally occurred at household level after the product has been opened.

(ii) further noted that there was a gap in this regard and agreed to request CCCF to consider if these products were susceptible to mycotoxin contamination; and if so, to consider if an ML could be developed for this product.10

COMMENT

Fermented cassava-based products were foodstuffs obtained from fresh cassava roots which are peeled, cut, dipped in water for fermentation for 3 to 5 days, then pressed prior to packaging into natural leaves and finally cooked. However there is need to do some further studies to confirm that there is no contamination along the entire chain if need be.

ANNEX
EXERCPT FROM CRD20
JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX ALIMENTARIUS COMMISSION

39th Session FAO Headquarters, Rome, Italy, 27 June – 1 July 2016

Emerging Issues: A proposed Risk Management Approach to Address Detection in Food of Chemicals of Very Low Public Health Concern

(Proposal from New Zealand)

Recommendation

22. It is recommended that the Executive Committee:

- a. **Note** the issues raised in this paper and the potential problems in international food trade arising from the inadvertent presence and detection of traces of chemicals in food that are of very low public health concern;
- b. **Endorse, in principle**, new work by Codex to develop risk management guidelines to address detection in food of trace levels of chemicals of very low exposure and very low potential public health concern;
- c. **Decide** on an appropriate Codex process to pursue the new work, including the option of referral to the CCCF; and
- d. **Note** the proposal for an *ad hoc* expert consultation (with support from interested members) at an early stage to support the proposed new work.

COMMENT

Kenya agrees and endorses the recommendations of New Zealand on this new emerging areas as presented to the Executive committee.

AU

2.3 A proposed risk management approach to address detection in food of chemicals of very low public health concern, based on a conference room document (CRD20) prepared by New Zealand

Position: AU supports the formation of an ad-hoc expert consultation, under the auspices of FAO/WHO, that would clarify the nature and extent of the problems and issues raised in this paper and review current approaches to risk assessment and risk management of chemicals of very low exposure and very low public health concern and provide recommendations regarding possible harmonized approaches for consideration at the international level.

Rationale: The matter was raised by New Zealand following challenges facing regulatory authorities in dealing with foods containing traces of chemicals that are determined to be of very low public health concern. Currently the Threshold of Toxicological Concern (TTC) approach appears to have significant international attention as one possible approach. The TTC approach has been recently reviewed by an expert consultation convened by the European Food Safety Authority (EFSA) and the World Health Organization (WHO), with the participation of the US Food and Drug Administration (FDA) to update and extend the TTC framework. The report of this consultation recommends a globally harmonized decision tree framework for the application of the TTC in the risk assessment of chemicals. The recommendation is based on the fact that TTC approach is not applicable when compound specific assessment and toxicity data are available or are required under existing regulations. The trace chemical data are increasingly being required by regulatory authorities because there are advanced analytical methods and testing technologies enabling detection of trace chemicals that are of very low exposure and very low potential public health concern.