

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 11

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ORIGINAL LANGUAGE ONLY

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

DISCUSSION PAPER ON MAXIMUM LEVELS FOR MYCOTOXINS IN SPICES

Comments submitted by Ecuador, EU, Kenya, Peru, Republic of Korea and AU

ECUADOR

Ecuador agradece a la India y a la Unión Europea por el desarrollo del documento de debate sobre Niveles Máximos para las micotoxinas en las especias, al respecto a Ecuador le gustaría mencionar lo siguiente:

(i) Comentarios Generales:

Ecuador apoya el criterio de que se trabaje sobre Niveles Máximos para especias en aflatoxinas totales y en Ocratoxina A, esto en vista de que las aflatoxinas totales incluyen el estudio y análisis de la aflatoxina B1.

Dicho lo anterior, Ecuador considera que es necesario cambiar el nombre del documento:

- ~~DOCUMENTO DE DEBATE SOBRE NIVELES MÁXIMOS PARA LAS MICOTOXINAS EN LAS ESPECIAS.~~
- **DOCUMENTO DE DEBATE SOBRE NIVELES MÁXIMOS PARA AFLATOXINAS TOTALES Y OCRATOXINA A EN LAS ESPECIAS.**

Justificación: Se propone este cambio en vista de que el documento considera el análisis aflatoxinas totales y Ocratoxina A, mientras que si se mantiene el nombre del documento bajo el término "micotoxinas", eventualmente podría abarcar la gama de otras micotoxinas.

Con estas consideraciones, Ecuador apoyaría el avance del trabajo.

EU

The European Union (EU) welcomes and appreciates the work done by the electronic Working Group chaired by India and co-chaired by the European Union on the discussion paper on the development of maximum levels for mycotoxins in spices.

The EU wishes to refer to the conclusions agreed at the 10th session of CCCF in 2016 (REP16/CF, §148) and to provide comments to which extent the discussion paper CX/CF 17/11/3 addresses the agreed terms of reference.

"The Committee agreed that further work was needed to expand on the MLs through an EWG chaired by India and co-chaired by the EU, working in English only with the following terms of reference:

- *provide a rationale for selection of spices (chilli, paprika, ginger, nutmeg, pepper, turmeric)*
- *provide rationale for selection of total aflatoxins and ochratoxin A (OTA)*
- *take into account the outcome of JECFA evaluation of 2016*
- *consider trade aspects of existing national standards*
- *prepare a Project document for new work with proposals for MLs for spices. "*

The EU is of the opinion that the discussion document sufficiently provides for the rationale for the selection of spices.

As regards the rationale provided for the selection of total aflatoxins and OTA: the EU notes the following inconsistencies in document CX/CF 17/11/11 :

- § 9 refers to possible maximum levels (MLs) for total aflatoxins and ochratoxin A
- § 9 and Annex V to Appendix I (table 17) mention that MLs will be established for aflatoxin B1, total aflatoxins and OTA.

- Appendix II, project document, under point 3 "main aspects to be covered" mentions the establishment of MLs for aflatoxins (for aflatoxin B1, total aflatoxins) and for OTA.

The EU is of the opinion that the discussion paper does not provide convincing evidence to change the conclusion agreed at CCCF10, i.e. to consider the establishment of MLs for total aflatoxins only and OTA.

As regards the JECFA evaluation in 2016, JECFA updated the aflatoxin risk assessment at its 83rd session in 2016 but based on the available information (summary and conclusions) did not assess specifically the possible health risk related to the presence of aflatoxins in spices.

The EU is of the opinion that the discussion paper provides sufficient information as regards trade aspects of existing national standards.

The EU notes that the draft project document for new work as provided in Appendix II of the discussion paper does not provide for proposals for MLs for spices.

In addition to the abovementioned general comments, the EU wishes to make following specific comments to the discussion paper, in particular to the conclusions and recommendations in §6 to §9 and to the project document in Appendix II.

Conclusions and recommendations in §6 to §9:

§ 6: The EU has established MLs for identified individual spices for aflatoxins and OTA, although the same ML for aflatoxin B1 and aflatoxin total is established for the different individual spices and for OTA, only for *Capsicum spp.* a different ML from the other identified individual spices was established.

§ 8: The EU can agree on the setting of MLs for individual spices but is of the opinion that the lack of consumption data for individual spices cannot serve as the justification for that choice.

§ 9: The EU is of the opinion that the discussion paper does not provide the justification for the suggested maximum levels.

Table 17: aflatoxin B1 should be deleted from the mycotoxins for which MLs will be established (see comments made above).

Project document in Appendix II:

Point 1: aflatoxin B1 should be deleted (see comments made above).

Point 2: JECFA evaluated aflatoxins also at its 83rd meeting, so this should be included.

Point 3: aflatoxin B1 should be deleted (see comments made above).

Point 5, goal 2: the establishment of MLs is not only to be based on exposure assessment by JECFA but has to take into account all the criteria for the establishment of maximum levels in food and feed mentioned in point 1.3.3. and elaborated in more detail in the Annex I of the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995)

Point 9: this has to be reformulated as the project document to be presented for approval of new work to the 40th meeting of Codex Alimentarius Commission in July 2017 should refer to CCCF12.

KENYA

COMMENT

- Support for the setting of MLs for Total aflatoxins and OTA in spices in chili, paprika, ginger, nutmeg, pepper. Note that Aflatoxin B1 is customarily regulated through the ML for Total Aflatoxins
- Request JECFA to evaluate for appropriateness of each of OTA and aflatoxins in the spices categories

Rationale:

Data from Africa demonstrate clearly that aflatoxins and ochratoxin A are the major mycotoxins of concern in the spices.

PERU**OBSERVACIONES GENERALES:**

De la revisión de la información estadística sobre exportaciones de especias, según partidas arancelarias, que tiene como fuente al Anuario de Comercio Exterior Agrario 2014 del Ministerio de Agricultura y Riego de Perú, permite concluir:

a.- Sobre Volúmenes:

- El primer lugar es ocupado por la **PAPRIKA (*Capsicum annuum L.*)**: triturado, pulverizado.
- En segundo lugar de exportación lo tiene el Pimiento Piquillo (***Capsicum annuum***).
- El tercer lugar por el jengibre sin triturar ni pulverizar.

b.- Sobre Países de destino y volúmenes:

- El primer lugar es ocupado por España con la especia Pimiento Piquillo (***Capsicum annuum***)
- El segundo lugar es ocupado por Estados Unidos de Norteamérica con la especia PAPRIKA: ***Capsicum annuum L.*** triturado, pulverizado.

El Laboratorio del Centro de Control de Insumos y Residuos Tóxicos del Servicio Nacional de Sanidad Agraria - SENASA, acreditado por la ANSI-ASQ National Accreditation Board con la Norma Internacional ISO/RIEC 17025:2005, efectuó análisis de Aflatoxinas y Ocratoxina A en paprika en el marco de los Planes Anuales de Monitoreo de Contaminantes mediante Cromatografía Líquida acoplada a espectrometría de masa en Tándem (LC/MS/MS). Los resultados indican una ligera tendencia a la presencia de Aflatoxina B₁ y Ocratoxina A.

OBSERVACIONES ESPECÍFICAS:

Se propone establecer límites máximos para paprika y pimientos rojos (red chilli pepper), que no se encuentran incluidos en el documento de debate.

Consideramos que no es necesario establecer niveles máximos tanto para Aflatoxinas totales como para la Aflatoxina B₁, ya que sólo bastan los niveles máximos permisibles de Aflatoxinas totales, las cuales incluyen a la Aflatoxina B₁.

Se debe determinar los niveles de Ocratoxina A por ser una potente nefrotoxina que causa tanto efectos agudos como crónicos en los riñones de todas las especies de mamíferos ensayados.

REPUBLIC OF KOREA

The Republic of Korea supports the establishment of maximum levels for total aflatoxins, aflatoxins B₁ and ochratoxin A for the priority list of spices.

AU

Position: AU supports the continuation of work for the establishment of MLs for aflatoxin B₁, total aflatoxins and ochratoxin A in dried and dehydrated group of spices comprising of nutmeg, chilli and paprika, ginger, pepper and turmeric.

Rationale: Spices are traded and widely consumed in Africa. Africa will continue to support setting of MLs because the MLs will provide a means of protecting public health and ensuring fairness in international trade of spices. AU will continue to support establishment of limits as long as the proposed limits are achievable.