

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5-11, 13

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

15th Session

Virtual

9-13 and 24 May 2022

Comments of AIDSMO

The objective of this conference room document is to offer comments on behalf of the Arab Industrial Development, Standardization and Mining Organization (AIDSMO), an observer organization of the Codex Alimentarius Commission, on various agenda items tabled at the 15th Session of the Codex Committee on Contaminants in Food (CCCF15).

These comments were developed by an Expert Group of the Arab Codex Initiative and with consultation of Codex contact points of countries from the Arab and their stakeholders.

These comments should not be considered as an official position in lieu of the official position of country delegations, members of the League of Arab states, represented at the CCCF15.

Agenda Item 5: CX/CF 22/15/5

AIDSMO offers the following comments:

- It would be recommended that the proposed MLs stemming from the proportional approach include a multiplication factor of two to account for the fact that Cadmium is found in the nonfat solids portion of cocoa, which typically represents about 45% of the composition of Chocolate. A compromise position for a ML at 2 mg/kg would fulfill this reasoning and would align with the lower interval of the values derived through the analysis of the GEMS/Food data, with an estimated global rejection rates of 4.39% (lower than 5%).
- Should consensus on this value be not achieved during CCCF15, it may be advised to suspend the work on the development of this standard, until the adoption and implementation of the relevant Code of Practice - COP (discussed under agenda item 6 of CCCF15).
- The committee suggest removing the statement "sold for final consumption" from the way the ML would be listed. Rather, the ML would apply to the ingredient 100% Cocoa powder.

Agenda Item 6: CX/CF 22/15/6

AIDSMO supports the adoption of this COP at Step 8, with the following clarifications to be made during the CCCF15 discussions:

- Better, qualify the practices that have been proven to be effective and their performance and distinguish them from experimental measures. The former practices could be listed first in the COP.
- The COP could address agricultural realities and recommend mitigation measures that are practical and achievable for farmers and producers. Options listed in the current draft of the COP, which would be considered experimental, should be deleted or identified clearly as such under a separate heading.
- The COP could identify mitigation measures that are applicable in the short-term and that are readily available to producers for implementation.
- Long-term mitigation measures identified in the COP might need to be characterized for their achievability to avoid committing to measures that might be difficult for farmers or producers to comply with, in the future.

Agenda Item 7: CX/CF 22/15/7

- This item is considered of a great interest for the Arab region, since numerous food commodities under consideration are produced and consumed in Arab countries.
- Reduction of exposure to lead through food remains of the utmost importance to the Arab region and the rest of the world.
- Some recommended MLs offer sufficient rationale to be considered for adoption such as for corn and maple syrups (0.1 mg/kg), molasses (0.3 mg/kg), candy (0.1 mg/kg), powder candy (0.2 mg/kg), cereal-based products for infants and young children, expressed "as is" (0.05 mg/kg).
- Of particular interest, levels of honey (from data not provided to GEMS / Food) were consistently found above 0.06 ppm, may not be achievable for the vast majority of producing countries in the region.
- Others such as the proposed ML for honey, spices and aromatic herbs will need to be further considered, along with the identification of the root cause for possible lead contamination and whether existing mitigation measures would help achieve proposed MLs.
- As a result, the proposed MLs for commodities, where impact was not fully characterized, could be considered to return to step two of the Codex procedure to enable countries of the Arab region to contribute with more data and therefore better characterize their impacts.

Agenda Item 8: CX/CF 22/15/8

- The work conducted thus far is very important to support reduction of foodborne exposure to methyl mercury. It is therefore recommended that further work be carried out to ensure the practicality of the proposed sampling plan.
- More clarification is also needed with regards to trade data and criteria for Orange roughy and pink cusk-eel.
- Unless clarifications are provided during CCCF15, it is recommended that this standard be returned to Step 2.

Agenda Item 9: CX/CF 22/15/9

AIDSMO observes that data submitted and included in Appendix II of working document CX/CF 22/15/9 do not offer a good geographic representation from various regions of the world.

AIDSMO supports Arab countries continued consideration and submission of data to the GEMS/ Food Program in general, and particularly in this instance where this standard would offer a contribution towards reduction of exposure to Aflatoxins from commodities of high relevance to the Arab region: cereals and cereal-based products.

Most MLs proposed would be considered acceptable, in that they would offer a contribution to reduction of exposure to Aflatoxins from the targeted commodities. However, some MLs may gain to be further reduced, because of the potential higher level of achievability (e.g. Maize grain, destined for further processing) or the fact that the commodities are directed to more vulnerable groups.

For example:

- The proposed ML for Maize grain destined for further processed would gain to be set at 20 µg/kg or lower.
- Reduced, because of the public health impact of these toxins and the contribution of this commodity to the overall exposure for this sub-category of the population. Values lower than 5 or 2.5 µg/kg could be considered.
- Similarly, the discussion on sampling plan may need to be adjourned, since its establishment is intimately linked to the MLs to be agreed upon.

Agenda Item 10: CX/CF 22/15/10

AIDSMO notes that the data submitted and included in Appendix II of document CX/CF 22/15/10 does not contain any input from the Arab region, whereas the region is a substantial consumer of ready-to-eat peanuts with some countries even contributing to the production and trade of this commodity.

In view of the conclusion made by JECFA that there was no major additional public health benefit resulting from the adoption of a ML lower than 15 µg/kg, AIDSMO suggests to adopt the value recommended by JECFA, i.e. 15 µg/kg of total aflatoxins in ready-to-eat peanuts as the Codex ML.

This would help address the current uncertainties related to the estimation of the rejection rates anticipated from other values, based on the GEMS/Food data, which offer a limited representation from developing countries.

Agenda Item 11: CX/CF 22/15/11

AIDSMO wishes to note the late publication of the documents associated with this codex text, and recommends to postpone the discussion on this item, until the next session of CCCF (CCCF16).

Agenda Item 13: CX/CF 22/15/8

- Considering the limited data received, despite no less than 2 rounds of calls for data, we suggest that the establishment of a ML for Patagonian tooth fish be suspended until such time that more meaningful data becomes available.
- AIDSMO also notes the on-going efforts to develop guidance for the management of methylmercury in fish and recommends the inclusion of such guidance as part of the guidance being considered on the sampling plan.