

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 2, 8, 10(a), 14 and 15

CRD09

ORIGINAL LANGUAGE

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

14<sup>th</sup> Session

(virtual)

3-7 and 13 May 2021

Comments of India

### Agenda Item 2: CX/CF 21/14/2

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

##### Standard on General Methods of Analysis for Contaminants (CXS 228-2001):

**Comments:** India proposes to include ICP-MS as an alternative detection method in the CXS 228-2001 as it is more efficient than AAS

### Agenda Item 8: CX/CF 21/14/8

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#### MAXIMUM LEVELS FOR LEAD IN CERTAIN FOOD CATEGORIES

**General Comment:** India does not support the proposed MLs for Spices and Culinary Herb as it has been observed that many spices producing countries have not submitted the data; hence the data considered is not enough geographical representation of spice producing countries. Also, India wishes to submit fresh data for all categories of spices and culinary herbs before establishing MLs. Therefore, the limits maybe reworked after collecting more data from primary producer countries.

The data submitted by India recently also does not support the proposed levels for Rhizomes, bulbs and roots; fruits and berries. Further, data pertaining to other category is not significant enough to drive any conclusion. Therefore, we wish to generate more data on other categories as well.

#### Specific Comments:

- a. Whether different rejection rates should be established for different types of products and contaminants other than the already agreed rejection rate of 5% currently being applied: -

**Comment:** A different rejection rate will be more appropriate rather than a flat rejection rate of 5% based on some specified criteria which should take into account the consumption pattern of that food product. E.g. in case of spices and herbs, the consumption of this commodity is much lesser than others and hence should be taken into account while fixing its acceptable rate of rejection.

- b. If an ML should be established in dried spices and culinary herbs or whether to use concentration factors from the fresh products and assume the same MLs for lead in leafy vegetables: -

**Comment:** India is of the view that an ML should be established differently for different dried spices and culinary herbs without the use of conversion factor because the post-harvest processing and storage will have an impact on the MLs. Also, the post-harvest processing practices including the cleanliness of the environment, inputs/materials used etc. can have a bearing.

- c. If it should be established a 2.0 mg/kg ML for all dried rhizomes, bulbs and roots: -

**Comment:** As stated earlier, India does not agree with the proposed MLs for the aforementioned reasons. Further, Commodity adulteration should not be accounted for while establishing MLs as adulteration is an intentional addition while contaminants come in the food unintentionally through various environmental and processing factors.

- i. To set an ML for cereal-based food for infants and young children “as is” or “as consume”:-

**Comment:** An ML for cereal-based food for infants and young children should be set “as is” since “as is” is easier to be implemented by the regulator and moreover “as consumed” definition differs from individual to individual.

- ii. Whether to set an ML for lead in herbal tea specific for infant and young children or for lead in teas

and herbal teas (solid, dried):

**Comment:** India supports to set an ML for lead in teas and herbal teas (solid, dried) only, since herbal teas are not specifically meant for consumption of infants and young children.

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**Agenda Item 10(a): CX/CF 21/14/10-Part I**

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**MAXIMUM LEVELS FOR TOTAL AFLATOXINS IN CERTAIN CEREALS AND CEREAL-BASED PRODUCTS INCLUDING FOODS FOR INFANTS AND YOUNG CHILDREN**

**Comment:** India proposes that final MLs need to be set after analysing more data from different geographies while taking in to account all the environmental stress factors at different climatic conditions worldwide. However, in the lack of representative data and to address the immediate concern of trade, India strongly supports proposal 1 for all categories of cereal and cereal based products as all rejection levels are well below 5% which is acceptable.

**Rationale:**

- i. For finalising the MLs, data needs to be compiled while take into consideration both tropical and temperate climatic conditions as the risk of aflatoxin contaminations increases with hot and dry climates.
- ii. Since, the data considered was submitted mainly by European Union and the USA, hence it is not geographically representative of producing countries

Considering above two facts, it will be appropriate to establish more relaxed MLs with least trade restrictions/rejections in order to address the issue of climatic conditions of those geographical regions who are not able to submit the data and might have impacts on aflatoxins levels.

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**Agenda Item 14: CX/CF 21/14/12**

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**HYDROCYANIC ACID AND MYCOTOXIN CONTAMINATION IN CASSAVA AND CASSAVA-BASED PRODUCTS**

**Comment:** India proposes to submit occurrence data for HCN in Cassava and Cassava based products for an informed decision to be taken based on occurrence data so that smooth trade of cassava products can take place.

**Rationale:** There have been rejections in Tapioca chips and other cassava and cassava based products from India to Australia and Middle Eastern countries therefore, India wish to submit data so that informed decision could be taken while establishing MLs.

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**Agenda Item 15: CX/CF 21/14/13**

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**DISCUSSION PAPER ON CADMIUM AND LEAD IN QUINOA**

**Comment:** India proposes that MLs for Cadmium and lead should be established separately based on the available scientific data specific to it only.

**Rationale:** Quinoa is a pseudocereal and the conditions for growing it is different from other cereals. It is known that cereal crops are necessarily grasses, a composite term which refers to monocot plants under the family Poaceae or Gramineae. However, the pseudocereals or pseudograins are not grasses. They include members of the families Amaranthaceae (amaranths), Chenopodiaceae (goosefoot) and Polygoniaceae (smartweed). Hence, it would be appropriate to consider quinoa separately and an ML for lead & Cadmium in this commodity should essentially be based on the data specific to it.