



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

Comments submitted by Dominica on agenda item 5, 6, 10 and 12

### Agenda Item 5

#### **PROPOSED DRAFT AND DRAFT MAXIMUM LEVELS FOR LEAD IN SELECTED FRUITS AND VEGETABLES (FRESH AND PROCESSED) AND OTHER SELECTED FOOD CATEGORIES IN THE GENERAL STANDARD FOR CONTAMINANTS AND TOXINS IN FOOD AND FEED (CODEX STAN 193-1995) (AT STEPS 7 AND 4)**

Dominica welcomes work in this area and commends the committee for its proactive nature in addressing the concern.

However due to the lack of available occurrence data Dominica is not in a position to meaningfully comment on the proposed MLs and is guided by the comments and data set analysis as is provided by CCCF.

### Agenda Item 6

#### **PROPOSED DRAFT MAXIMUM LEVELS FOR CADMIUM IN CHOCOLATE AND COCOA-DERIVED PRODUCTS (AT STEP 4)**

Dominica recognizes the importance of this work and thanks the EWG for its steadfast approach.

More importantly Dominica recognizes that it needs to strengthen its sampling and analytical capabilities as the lack of nationally determined ML for Cd for chocolate and cocoa derived products could threaten cocoa exports.

However Dominica also recognizes that the approved work is specific to MLs for Cd content in chocolate and cocoa derived products as agreed for the following food categories: intermediate products i.e. cocoa liquor and cocoa powder cake; and finished products based on total cocoa solids content (%), i.e. chocolate and cocoa powder ready-for-consumption.

This is of concern to small infant producers such as Dominica because the lack of clear guidelines with regards to Cd concentrations in cocoa beans could potentially hinder exports in terms of the international cocoa bean market. However the evaluations from Lee & Low (1985) are noteworthy. In addition, the criteria from the GEMS/Food platform with the inclusion of cocoa beans as a named food further highlights the concern of clarity regarding the cocoa bean as a relevant source of Cd. Hence it may still be appropriate to consider what was described in the 10<sup>th</sup> Meeting of the CCCF and the necessity to propose a classification based on the data from GEMS/Food. This is most relevant and rightly noted based on the classifications that can become very scattered according to the market of origin. Hence although cocoa beans were not considered for ML establishment, it was rightly noted that the information on Cd concentrations in cocoa beans could help show that processing cocoa beans to obtain cocoa powder and cocoa butter influences the distribution of Cd.

### Agenda Item 10

#### **PROPOSED DRAFT CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF MYCOTOXIN CONTAMINATION IN SPICES (AT STEP 4)**

Dominica supports the work on the COP for the reduction of mycotoxins in spices.

Dominica, would like to highlighted the summary report [2.ii] in respect to paragraph 19 (reference to the term compost), consideration should be given to expand and/or define properly treated organic waste, to include for consideration: aerobic fermented compost teas, effective microorganisms cultures, biogas leachate, fermented urine as examples which could bring about improved soil fertility and increase soil microbial activity.

### Agenda Item 12

#### **DISCUSSION PAPER ON METHYLMERCURY IN FISH**

Dominica supports the committee work on developing MLs for Methylmercury in fish recognizing the importance of fish consumption in the national diet to include patterns of fish consumption and types of fish consumed, as well as new and emerging opportunities for international trade. However it should also be noted that due consideration should be given in setting different MLs for different species of tuna in the first

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instance. In this regard consideration has to be given to the migratory nature of fish to include pelagic, demersal and reef fish.