

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

17th Session
15-19 April 2024

Comments submitted by Burundi

The Republic of Burundi appreciates the opportunity to provide comments on different agenda items to be discussed by the 17th Session of the Codex Committee on Contaminants in Foods.

Agenda Item 3: Matters of interest arising from FAO and WHO including the Joint FAO/WHO Expert Committee on Food Additives

Comment: Burundi thanks the joint FAO/WHO JECFA Secretariat on their work. Burundi further lauds the information published on the Global Food Consumption Databases and ongoing activities to support countries to generate and to use data for risk analysis purposes. Burundi also notes the concern on the quality of data submitted by members and recommends that FAO and WHO should continue with capacity building that will improve the quality of data submitted by countries to the GEMS Food data base. Addressing these concerns requires coordinated efforts from governments, international organizations, and the private sector. Investing in data infrastructure, capacity building can help improve the quality, reliability, and accessibility of data from countries, enabling more informed decision-making and better public health outcomes.

Rationale: This will significantly reduce costs of research in our developing countries

Agenda Item 5: Maximum levels for lead in certain food categories (at Step 4)

Comment: Burundi supports the lower range of maximum levels of 2mg/kg in Spices, dried bark of Cinnamon, canella, cassia and Spices, dried floral parts of Saffron, Cloves, Capers. Burundi further supports the Maximum levels provided for other 5 spices, seeds and culinary herbs and supports recommendation of these MLs to step 5/8.

Rationale: Considering data/information provided under the key points of discussion and Appendices II and III. Also, they will be protective of our health and trade

Comment: For Sichuan pepper, Burundi proposes that the standard be held at step 4.

Rationale: to allow more time for additional data/information from other countries to be provided since the data provided was not geographically representative.

Agenda Item 6: Sampling plans for methylmercury in fish (at Step 4)

Comment: Burundi notes that significant amount of work has been put in by the EWG chaired by New Zealand and co-chaired by Canada. Burundi supports adoption of the sampling plans at Step 5 to offer opportunity to members to provide necessary information and data that will facilitate in arriving at comprehensive sampling plan.

Rationale: There is insufficient information to support progression to Step 5/8. This particularly relates to the need for more data on methylmercury distribution in fish tissues and the practicality of the sampling plan. Moving the standard to Step 5 will allow for more research to be done and for members to provide more information. It will further help in harmonizing the data that is generated during the period the standard will be at Step 5.

The sampling plan should be further developed in order to continue considering aspects raised in paragraphs 32, 55 and 56 (Appendix III). By developing a well-designed sampling plan for Methyl Mercury in fish, Members can effectively monitor contamination levels, assess potential risks to human health and environment and implement appropriate mitigation measures to protect public health and ensure Food Safety.

Agenda Item 7: Definition for ready-to-eat peanuts for the establishment of a maximum level for total aflatoxins in this product

Comment: Burundi supports the following revised definition for RTE peanuts: Ready-to-Eat Peanuts is a product intended for direct human consumption, not intended to undergo an additional processing/treatment that has proven to reduce levels of aflatoxins, before being used as ingredients in foodstuffs, otherwise processed, packed in all types of packaging such as consumer or bulk, labeled as 'RTE Peanuts'. Includes, but not restricted to : (i) raw shelled peanuts, (ii) raw in-shell peanuts, (iii) roasted in-shell peanuts, (iv) roasted/blanched shelled peanuts, (v) fried shelled peanuts with or without skin, (vi) coated peanuts, (vii) seasoned peanuts, (viii) smoked peanuts, (ix) salted and cooked peanuts, (x) peanut butter.

Burundi further supports the issue of generation of additional data to help in the definition of Ready-to-Eat Peanuts which is important for segregation of data. Burundi agrees with the following recommendations of the EWG:

- CCCF should consider and agree on the proposed definition for RTE Peanuts (Appendix I) considering the discussions and rationale of the EWG;
- request the GEMS/Food administrator to issue a call AFT occurrence data in RTE peanuts; and
- re-establish the EWG, chaired by India, to further elaborate the ML for AFT in RTE peanuts as defined (in accordance with phase 2 of the work on MLs for AFT in RTE peanuts).

Rationale: Peanuts play an important food security and nutritional role in Burundi and many parts of Africa. They are grown in Burundi and in several African countries and are important for both subsistence and commercial purposes providing nutrition and income for many farmers across the continent. Peanuts are used in various dishes and products in Burundi cuisine and they also play a significant role in local economies through exportation. Therefore, it is imperative that appropriate definition and limits are set to protect the health of the consumers while facilitating fair trade. Overall, setting limits for aflatoxins is essential to safeguard public health, ensure Food Safety, facilitate trade and protect consumers from harmful effects of these toxins and also for regulatory compliance.

Agenda Item 8: Sampling plans for total aflatoxins and ochratoxin A in certain spices (at Step 4)

General comment: Burundi welcomes the effort of the Electronic Working Group in preparing this document. Burundi supports progression of the document to Step 5 to allow more time to review the document and provide the additional information to refine the plan.

Rationale: The support for the document to progress to Step 5 is to allow more members to review the document and provide comments and make more observations. This is against the background that the document was received late and there was not enough time to review and provide comments. The preliminary review indicates that there are issues that need clarification by the EWG before the document can progress for final adoption.

Agenda Item 9: Code of practice/guidelines for the prevention and reduction of ciguatera poisoning (at Step 4)

Comment: Burundi supports to consider the CoP as set out in Appendix I and determine its readiness for advancement in the step procedure. Burundi supports the work to progress to Step 5

Rationale: This will help in controlling and reducing the incidence of foodborne illnesses and also enhance trade opportunities by ensuring compliance with international food safety standards. Providing a Code of Practice for the Prevention and Reduction of ciguatera poisoning is an important public health measure which can contribute to protecting the health and wellbeing of consumers mitigate the economic losses and support livelihood of fishermen and seafood businesses.

Agenda Item 13: Request for comments on the recommendation for the establishment of maximum levels for cadmium and lead in quinoa

Comment: Burundi appreciates and welcomes the work done by the JECFA secretariat. Burundi does not support the establishment of specific ML for Cadmium and Lead in Quinoa at this present time on account of insufficient evidence. Continuous engagement with JECFA on the matter may be useful in finding a practical solution in the future.

Rationale: Based on available data and consumption pattern for quinoa, establishing ML will have minimal impact on dietary pattern and there is no strong scientific evidence to warrant establishment of ML for Lead and Cadmium. Furthermore, the availability of ML in cereals which are in similar class as quinoa provides the relief of safety for human consumption of quinoa.

Agenda Item 15: Review of the Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feedingstuffs for Milk-Producing Animals (CXC 45-1997)

Comment: Burundi supports new work on the code of practice for the reduction of Aflatoxins B1 in raw materials and supplemental feeding stuffs for milk-producing animals. Burundi also supports the advancement of the work in the step process.

Rationale: Aflatoxins can significantly impact public health and there is also new scientific data/information to support this work. Aflatoxins can cause acute and chronic health effects, including liver damage and immune suppression and increased risk of liver cancer. Children and individuals with compromised immune systems are particularly vulnerable. Aflatoxins contamination can also restrict trade; hence reducing its contamination is essential for safeguarding public health, ensuring food safety, and facilitating trade.

Agenda Item 16: Development of a Code of practice for the prevention and reduction of cadmium contamination in foods

Comment: Burundi appreciates the work done by the United States of America and supports the Proposal for new work on a Code of Practice for the Prevention and Reduction of Cadmium Contamination in Foods to be considered.

Rationale: Development of the Code of practice for prevention and reduction of cadmium contamination in foods will complement the already existing code of practice on prevention and reduction of contaminants in cocoa. This work is important for Burundi as it will strengthen the current measures in ensuring protection of the consumer health and facilitation of trade.

Agenda Item 18: Review of Codex standards for contaminants

Comment: Burundi supports work done by the Working group and notes the importance of the review of contaminants including the work on Aflatoxins and heavy metals which are among the priorities many countries.

Rationale: The re-evaluation of standards is a normal and standard process in the Codex standard development process. The working group emphasized the long time it takes for some standards before consideration for re-evaluation or placing on priority list. This hence calls for members to support this work.