CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Items 5, 6, 7, 8 and 9 **CRD15**

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

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Comments submitted by Rwanda

Agenda Item 5: Maximum levels for lead in certain food categories (at Steps 4 and 7)

Page 6 Appendix 1 of the CX/CF 23/16/5	Rwanda supports the proposed MLs of 0.15mg/Kg for sugars.	We have supported the proposed MLs based on the relevance of sugar in international trade and considering also that MLs more than 0.15mg/kg could increase the rejection rates. Moreover, even if there is no toxicological information at codex level, this limit seems to be protective at the level of consumption of sugar recommended by WHO.
Page 7 Appendix 1 of the CX/CF 23/16/5	Rwanda supports 0.03mg/kg for whole commodity	The support of this limit is based on the fact that products for infants and young children are most of the time used as complementary food and the level of consumption with this limit may not cause risk.

Agenda Item 6: Code of Practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products (at Step 7)

Introduction paragraph 1	Indicate also other fungus that can cause mycotoxin and ochratoxin A, even if they are of small importance.	Mentioning other species provide good information to the user of the standards mainly for those involved in research and other root cause analysis activities.
Introduction paragraph 4	Indicate the growth stage(s) at which the provided levels of hydrocyanic are referred to	This to avoid confusion
	The presence of certain mycotoxins in cassava and cassava-based products destined for human food and animal feed use is not unexpected. Need to use simple language and use 'is expected'	For easy of understanding
	"as indicated in the Code of practice for the prevention and reduction of mycotoxin contamination in cereals (CXC 51-2003)". Need to delete the above text because someone may think that the provisions that we have in CXC 52 are applicable	This to avoid confusion in the implementation of this document

Paragraph 9	Paragraph 9 should be preceded by title otherwise it is hanging. Add 2.1 Site selection	To keep consistence of the structure throughout the whole document
	As it was done for susceptible crops, there is a need to provide an example of crops which are resistant to mycotoxin/ochratoxin A producing fungi to be recommended for rotation	To guide the implementers of the standards
	"Proper planning for crop rotation in successive seasons" This part should be more elaborated by providing key factors to consider for proper rotation (previous crop, level of contamination of the previous crop, characteristic of the growing season.	To provide guidance to the farmer
2.2 cassava varieties selection	In addition to the selection of varieties, the paragraph includes the selection of seeds. Amend the title to include seeds to read "cassava varieties and seeds selection" It is not only fungus that affect the seeds, the last statement to include also bacteria and viruses	Quality of seeds is key for the future of the crop being produced.
Paragraph 13	The provision in paragraph 13 to be deleted	It is a repetition of what is in paragraph 9
Propose new clause under clause 3	Add a sub-clause on fertilization to guide the user on the selection of appropriate fertilizer both mineral and organic which are acceptable in regards to the contaminants	Fertilizers are important to improve and maintain the vigour of the plant, thus the resistance to pests and diseases.
Paragraph 17	In addition to the quantity of water, need to provide recommendation on the quality of water for irrigation which has to be appropriate in regard to the contaminants, acidity and minerals or any other relevant parameters.	The quality of water for irrigation is very important as it may bring substances that may increase the stress to plant
4.1 harvesting	Additional paragraph to be added to recommend adoption of harvesting practice and care that will avoid injuries to cassava tubers	Injured tubers increase the contamination by fungus
Paragraph 22	"Water activity (aw), commonly defined in foods as the water that is not bound to food molecules that can support the growth of bacteria, yeasts, and fungi" If the intention of this statement is to provide definition, it should be amended and put as a footnote	The statement does not provide any recommendation but a definition.

Paragraph 36	"The milling machine should be cleaned and washed after use". Washing to be removed from this recommendation and remain with cleaning only. Appropriate method for cleaning should be adopted	Washing implies the use of water and it may be difficult to wash some machines depending on their design and materials. Washing may lead to rusting if the used material is not stainless.
Paragraph 39	Cleaning only may not be enough, a statement on fumigation by using appropriate fumigants and by competent staff should be added	Cleaning is not effective to remove fungus and all insects
Paragraph 40	"The bags should facilitate aeration and be made of non-toxic food-grade materials that do not attract insects or rodents and are sufficiently strong to allow storage for longer periods as indicated in the Code of practice for the reduction of mycotoxin contamination in cereals (CXC 51-2003)". Better to refer to a specific clause of the CXC 51 or borrow the relevant provision	For ease of the implementation of the standard
Paragraph 41	A new statement recommending regular inspections of the store for moisture content of the stored products, insects' infestation or rodents is needed.	Delay in taking appropriate and timely intervention may happen when there is no regular inspection of the stored products.
Clause 7	Packaging should come before storage	For a good flow of provisions
Paragraph 42	It is important to recommend to check the moisture content before packaging and recommended the appropriate moisture content instead of water activity	Only dried product shall be packaged. Guiding on the level of moisture content will help the implementer of the standard to make a decision. Moisture content is more common and easy to understand, and most measurement devices provide moisture content reading.

Agenda Item 7: Sampling plans for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children (At Step 4)

Appendix 1	The table providing sampling plans needs to be numbered for reference	This is for easy of reference
Appendix 1	Link Table 3 and table 4 with how to get incremental samples as described in the sampling plans for: a) Aflatoxin (AFB1+AFB2+AFG1+AFG2) in maize grain, destined for further processing b) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in flour meal, semolina and flakes derived from maize	• Current drafts of sampling plans are silent on the number of incremental samples depending on the size of the lot. • Some sampling plans do not consider the lots having less than 0.5MT. • The other have provided fixed number of incremental samples and size of each incremental sample (10x100g)

	c) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in husked rice d) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in polished rice e) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in sorghum f) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in cereal-based food for infants and young children g) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in cereal-based food for infants and young children destined for food aid programs	
Appendix 1	Match Maximum levels and Decision rules of sampling plans for: a) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in flour meal, semolina and flakes derived from maize b) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in husked rice c) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in polished rice d) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in sorghum e) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in cereal-based food for infants and young children f) for aflatoxin (AFB1+AFB2+AFG1+AFG2) in cereal-based food for infants and young children destined for food aid programs	Decision should be taken based on the adopted maximum levels
Table 1 last column.	Specify the type of the sample indicated in the title of the last column "**minimum sample size'**; whether it means an aggregate sample or a laboratory.	For clarification and consistence in terminology used.
SAMPLING PLAN DESIGN CONSIDERATIONS	Test portion Indicated size of the laboratory sample 25g should instead be for the test	For consistency with sampling plans under appendix 1, a test portion is 25g

Paragraph 20	portion instead of it being for the laboratory sample.	
SAMPLING PLAN DESIGN CONSIDERATIONS Paragraph 20	**HOMOGENIZATION - GRINDING** The statement "If the laboratory sample is prepared using a liquid slurry, the slurry should contain 25 g of sample mass" is confusing. Specify how appropriate preparation by using slurry has to be done.	laboratory sample preparation using a slurry needs further clarifications to avoid interference with test results.
	There is a need to keep consistency and coherence within codex documents in regard to the recommendations on test methods for total aflatoxin in cereals and derived products.	In regard to the test method in every sampling plan and in paragraph 22, performance criteria-based approach was recommended when selecting the test method while Codex stan 234 recommends ISO 16050 as a test method for total aflatoxin on cereal and derived products.

Agenda Item 8: Maximum level for total aflatoxins in ready-to-eat peanuts and associated sampling plan (at Step 4)

Members to relook at 102 data points related to limit of detection (LOD) below 4 µg/kg. This recommendation is not clear to allow members to provide their position.

- Considering what we have in CX/CF 23/16/8, paragraph 4, which indicates that 102 data points rejected were related to LOD exceeding 4µg/kg, recommending relooking 102 data points related to LOD below 4µg/kg is misleading.
- The 102 data points and their related LOD were not shared with members.
- The LOD of 4µg/kg may not be helpful since we may consider the level of rejection based on a hypothetical limit below 4µg/kg.

Agenda Item 9: Maximum levels for total aflatoxins and Ochratoxin A in nutmeg, dried chili and paprika, ginger, pepper and turmeric and associated sampling plans (at Step 4)

CX/CF 23/16/9 Appendix 1, Part I	**F**or Dried chilli pepper and nutmeg, Rwanda is supporting the established MLs of 20µg/kg	This support is based on the data on rejection rate presented in the document. On the other hand, the level of consumption for these products is too comparing to other food products
CX/CF 23/16/9 Appendix 1, Part I	For Ginger, Black & White pepper, Rwanda proposes to set MLs of 10µg/kg	Considering the recommendation in Codex Stan 193 on toxicological guidance, where it is recommended to reduce the Aflatoxin intake as lower as possible, given that there is no major concern of rejection, setting 10µg/kg, will reduce the contribution of these products to the total intake of aflatoxin and will also encourage the producers/processors/manufacturers to adopt good practices which can reduce the level of contamination Turmeric was removed because the occurrence data do not go beyond 10µg/kg.
CX/CF 23/16/9 Appendix 1, Part I	Considering the range of Ochratoxin A reported in Black and White pepper-Table 1 (0.44-910 µg/kg) from submitted data (paragraph 16)	The range of Ochratoxin A in Black and White pepper is much greater than the range found in samples of nutmeg from which the ML was established as shown in the same table(table1).
	We propose to establish the ML of 20 µg/kg Ochratoxin A in black and white pepper	In addition, the majority of samples were not reported ND and percentage of rejection at ND is 75.

CX/CF 23/16/9 Appendix 1, Part II	**Sampling plans, Part I and Part II** Provide a sampling plan with considerations of static and dynamics lots	Align the sampling plan with procedures used in CXS 193 in provisions in Annex 1 paragraph 8 and paragraph 17
CX/CF 23/16/9 Appendix 1, Part II	Provide statements of introduction and definitions	Facilitating users of documents and overcome the confusions of used terms (considering the format of CXS 193 in Annex 1
CX/CF 23/16/9 Appendix 1, Part II in table 2	Clarify the meaning of **8 (- < 12 kg)** used in table 2-page 11	This figure is not clear for users. If it is indicating the range of application, why not apply the same approach to other aggregate weights.
CX/CF 23/16/9 Appendix 1, Part II	Describing or differentiating in specific way, with examples the terms: **Spices with large particle size** and **Spices with small particle size**	This may confuse the users practically during implementation: at which level the spices can be considered as with large particle size or small particle size
CX/CF 23/16/9 Appendix1 Part II table 1	Borrowing the ranges used in the second and third columns table 1 Subdivision of lots into sublots depending on product and lot weight in appendix 1 on page11 of CX/CF 23/16/9, from table 1 (the second and third columns). Subdivision of large lots into sublots for sampling in annex 1 page 15 of CXS 193-1995	More clarifications to users
CX/CF 23/16/9 Appendix1 Part II table 1	Rwanda proposes to insert the new range between 15-25 (as sublot 1) in the column of lot weight for the table 3 and table 5 to be written as >15 and≤25. The ranges shall be as follow: >25 ≥15 and≤25 <15	This proposal shall address the confusion caused when practically subdividing into sub-lots the lot weight between 15 and 25 tonnes