

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, 8 and 9

CRD16(Rev.)

April 2023

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

16th Session

18-21 April 2023 (physical plenary meeting)

26 April 2023 (virtual report adoption)

Comments submitted by The Philippines

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

On the proposed ML for lead of 0.15 mg/kg for soft brown, raw, and non-centrifuged sugars, the Philippines finds the proposed ML as acceptable in providing an appropriate level of consumer protection based on the very conservative assumptions in estimating the Margin of Exposure (MOE) of lead from brown sugar consumption in the Philippines.

Rationale: Dietary exposure to lead from brown sugar consumption was assessed based on the mean body weights of the different population groups, mean brown sugar consumption of 2-4g/day, and the proposed ML of 0.15 mg/kg. The conservative risk estimate using the MOE approach was computed to be ≥ 10 across all population groups, which is interpreted as “no appreciable risk of a clinically significant effect on Systolic Blood Pressure (SBP) and Intelligence Quotient (IQ)”.

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

General comments: The Philippines supports the final adoption of this document with some specific comments based on our national standards on Good Agricultural Practices (GAP) for cassava (PNS/BAFS 150:2020).

Specific Comments:

| Existing Codex Text | Philippine position/ comments | Reason/ Rationale |
|--|---|--|
| 2. Recommended Practices Applicable to Pre-Planting Stage, paragraph 9, page 4 | The farmer should avoid planting in valleys, to avoid pooling water and flooding. <u>Soil drainage should be considered in site selection to avoid waterlogging.</u> Water can transport fungal inoculums. | Well-drained area is recommended to avoid waterlogging which may promote the growth of mycotoxin-producing fungi. |
| 2.1 Farmland clearing and operation, paragraph 10, page 4 | Farmers are encouraged to adopt good agricultural practices <u>GAP</u> . | Acronym was indicated in paragraph 8, last sentence. |
| 2.2 Cassava variety (cultivar) selection, paragraph 11, page 4 | Selection and use of healthy, pest and <u>disease-free</u> cassava stems are important for good planting. <u>Pre-planting treatment for pest control may be applied, if necessary.</u> The ability to resist fungi and other plant pathogens should be considered when selecting cassava varieties. | Pre-planting treatments may be considered as an option to keep a pest-free cassava stem as planting material which in turn affects its health. |

| Existing Codex Text | Philippine position/ comments | Reason/ Rationale |
|---|---|---|
| 3.2 Weed control, paragraph 14, page 4 | Certain weeds can harbour toxigenic fungi and compete for moisture, light and nutrients thereby stifling cassava plant development. <u>Prior to planting, appropriate cultural practices such as proper land preparation, proper use of chemical inputs, off-barring and hilling-up should be practiced to control the weeds. During planting, e</u> Either manual or mechanical approaches can be used for weed control. <u>A</u> -approved herbicides could also be used. | To indicate that cultural practices may be done to prevent control weeds prior to planting and during production site preparation. |
| 3.3 Pesticide use, paragraph 16, page 4 | Approved pesticides <u>by the competent authority</u> could be used to minimize insect damage and fungal infection in the soil or around the crop. | To emphasize that competent authorities of national governments are those only authorized to approve pesticides for use in cassava. |
| 4.1 Harvesting, paragraph 19, page 5 | Cassava should be harvested when the soil is slightly soft and not overly saturated, in order to easily remove soil from the roots and avoid fungal contamination during peeling. <u>Freshly harvested cassava should be sorted separating damaged tubers.</u> | Damaged tubers may be a source of mycotoxin contamination. |
| 4.1 Harvesting, paragraph 20, page 5 | However, to meet market demand, cassava roots may be harvested all through the different climatic seasons. As such, it is necessary that measures be taken to prevent or reduce damages to harvested cassava roots, especially for hard soils, to prevent fungal growth after damage. <u>Care should be taken so as not to injure cassava tubers when harvesting as this will lead to contamination from the soil.</u> | To include additional provision on preventing contamination of cassava tubers with the soil which can be a source of mycotoxin. |

Reference: Philippine National Standard (PNS/BAFS 150:2020, ICS 67.2020). Good Agricultural Practices (GAP) for Cassava. Bureau of Agriculture and Fisheries Standards.

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

Position: The Philippines fully supports the recommendation of the Electronic Working Group (EWG) led by India to submit the Ready-to-eat (RTE) Peanut aflatoxin total occurrence data to GEMS/ FOOD for the years 2019 onwards. With this, the Philippines would like to confirm that we have already submitted/ uploaded the necessary data to GEMS/ FOOD.

Reason/Rationale: Submission of data to GEMS/FOOD will provide segregated RTE peanut occurrence data that is country/ geographical region-wise. In addition, it will help the Committee in developing targeted interventions and strategies to reduce the risk of Aflatoxins including establishment of Maximum Limit (ML).

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)

Position: The Philippines supports the following proposed MLs as presented by the Electronic Working Group (EWG) led by India, based on the data and information provided:

Total Aflatoxin:

Dried Chili Pepper and Nutmeg: 20 ug/kg

Ochratoxin A:

Dried Chili Pepper and Nutmeg: 20 ug/kg

Reason/Rationale: The acceptable rejection rate, which is below 5%, indicates that the recommended MLs of Total Aflatoxins and Ochratoxin A in Dried Chili and Nutmeg is practical and achievable, while still providing adequate protection for public health. Additionally, the low consumption of these spices, which is about 2.6g/ day worldwide (2g/day in the Philippines), means that the overall exposure is relatively low.

Reference: Philippine Nutrition Facts and Figures (2022). 2018-2019 Expanded National Survey (ENNS). Food Consumption Survey