

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 1, 5, 6, 7, 8, 9, 10 and 16

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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 India*

### **Agenda Item 1: Adoption of Agenda**

India supports the adoption of the provisional agenda. Also, India would like to propose the inclusion of Acrylamide in the priority list of contaminants for evaluation by JECFA under the Agenda item 16 and the same may also be discussed in the other business.

### **Agenda Item 5: Maximum levels for lead in certain food categories**

India appreciates the work done by Brazil as the chair of the EWG in setting the MLs for Lead in certain food categories.

- **Soft brown, raw and non –centrifuged sugars:** India supports the ML of 0.15 mg/kg as proposed by the EWG.
- **Ready-to-eat meals for infants and young children:** India supports a single ML of 0.03 mg/kg as proposed by the EWG.

### **Agenda Item 6: Code of Practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products**

India appreciates and supports the work done by the EWG Chair, Nigeria and co-chair, Ghana in drafting the Code of Practices for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products

### **Agenda Item 7: Sampling plans for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children**

India as the co-chair of the EWG supports the work done by Brazil as the chair in preparing the sampling plans for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children

### **Agenda Item 8: Maximum level for total aflatoxins in ready-to-eat peanuts and associated sampling plan**

India as the chair of the EWG expresses its sincere gratitude to the co-chair of the EWG, Senegal and all the EWG members for participating in the process of establishing the MLs for total aflatoxins in ready-to-eat peanuts and associated sampling plan.

India would like to add the following as a new para at Point 4:

The categorization of RTE Peanut has also been mentioned as a concern for data retrieval by the WHO GEMS/Food Administrator. However, as the scope of RTE Peanut has been defined in the discussion paper placed before the 8th Session of CCCF, the same may be taken up in throughout the work which is reproduced as follows:

“The scope of RTE peanuts includes raw shelled peanuts, raw in-shell peanuts, roasted in-shell peanuts, roasted/blanched shelled peanuts, fried shelled peanuts with or without skin, coated peanuts in all types of packaging (consumer or bulk) and any other products having preparation of more than 20% of peanuts.”

### **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**

India as the chair of the EWG expresses its sincere gratitude to the EWG members for their contribution in setting up the MLs for total aflatoxins and ochratoxin A in nutmeg, dried chili and paprika, ginger, pepper and turmeric and associated sampling plans.

### **Agenda Item 10: Discussion paper on the prevention and reduction of ciguatera poisoning**

India appreciates and supports the work done by United States of America as EWG Chair and European Union as EWG Co-chair in drafting the discussion paper on the prevention and reduction of ciguatera poisoning.

**Agenda Item 16: Priority list of contaminants for evaluation by JECFA****1. Required information**

**1.1 Proposal for inclusion submitted by:** India

**1.2 Name of compound; chemical name(s):** Acrylamide

**1.3 Identification of (additional) data (toxicology, metabolism, occurrence, food consumption) which could be provided to JECFA:**

Food Safety and Standards Authority of India (FSSAI) conducted a Pan-India survey for Trans-Fat and Acrylamide Content during the year 2021. In the survey, 3142 samples from three different categories (i.e.) Fried Foods, Bakery and Confectionery products and Composite foods were analysed for the acrylamide content. It was found that 22% samples had more than 0.1 ppm, 3% samples had more than 1 ppm and 0.32% samples had more than 2 ppm acrylamide content. Also, FSSAI is planning to conduct surveys dedicated to acrylamide content in different product categories.

**1.4 List of countries where surveillance data are likely to be available, and if possible, name of contact person who could provide such data, including quality assurance information on the data:**

European union – European Food safety Authority (EFSA)

United States of America – Food & Drug Administration (FDA)

**1.5 Timeline for data availability:** Data expected to be available within in a year

**2. Optional detailed information**

**2.1 Whether or not the occurrence of the compound in commodities will have potential to cause public health and/or trade problems:**

There are literatures supporting the excessive consumption of foods containing acrylamide can cause human health concerns. Also, acrylamide is identified as a probable carcinogen for humans. Therefore, the acrylamide in food may have the potential to cause public health and trade problems

**2.2 Whether or not commodities containing the compound are in international trade and represent a significant portion of the diet:**

The foods majorly contain acrylamide are fried potatoes, potato chips, bakery and snack products, breakfast cereals and coffee. These foods constitute a significant part in the human diet throughout the global and found predominantly in the international trade.

**2.3 Commitment that a dossier (as complete as possible) will be available for evaluation by the JECFA.**

Yes

**2.4 Relevant justification and information on the following prioritization criteria**

**2.4.1 Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade;**

The higher dietary exposure of acrylamide in human diet may lead to safety and health concerns which also affects the food trade significantly.

**2.4.2 The needs and concerns of developing countries**

Presence of acrylamide is found in food products commonly available in both developing and developed countries.

**2.4.3 The diversity of national legislations and any apparent impediments to international trade;**

There are no national legislations developed maximum limits for acrylamide so there may not be any impediments to international trade.

**2.4.4 Work already undertaken by other international organisations**

EFSA and US FDA undertook the work for establishing the dietary exposure, risk assessment and toxicology of acrylamide in foods.

**2.4.5 The prospect of completing the work in a reasonable period of time**

The work is expected to be completed within one year of time

**2.4.6 The impact on international trade (i.e. magnitude of the problem in international trade)**

The detrimental effects of the acrylamide in foods were established. The occurrence of acrylamide in the food products may have a significant effect in the international trade.

**2.4.7 Compliance with the Codex Alimentarius Commission's Strategic Plan and its relevant plans of work**

The inclusion of acrylamide in the priority list of contaminants will contribute to the achievement of the Goal 1 (Establish international food standards that address current & emerging food issues) and Goal 2 (Ensure the application of risk analysis principles in the development of Codex standards) of CAC's Strategic Plan`

**2.4.8 The quality, quantity, adequacy, and availability of data pertinent to performing a risk assessment, including data from developing countries**

Additional data from developing and developed countries may be obtained to support the inclusion of acrylamide in the priority list of contaminants.

**2.4.9 Compliance with CCCF's Terms of Reference:** Yes

**2.4.10 Compliance with JECFA's Terms of Reference:** Yes

**2.5 Additional data/information to complement what is provided in this template: Note that this point does not replace the submission of the template through the OCS. This point is complementary to the data/information provided in points 1 – 2.4.**