

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Sixth Session

Maastricht, The Netherlands, 26 – 30 March 2012

PROPOSED DRAFT MAXIMUM LEVELS FOR TOTAL AFLATOXINS IN DRIED FIGS
INCLUDING SAMPLING PLANS

Comments at Step 3 submitted by Costa Rica, European Union, Kenya and USA

COSTA RICA

Costa Rica welcomes the opportunity to provide comments on document CX/CF12/6/10 Proposed Draft Maximum Levels for Total Aflatoxins in dried figs including sampling plans, detailed below:

Costa Rica continues to support the setting of a maximum level of 10 µg/kg for aflatoxins in dried figs, as well as the associated sampling plans.

Justification

In Costa Rica, figs processing is artisanal and figs are processed mainly in sugar, not dry, nor do we have data for aflatoxins in this particular food. However, the CCCF has established levels for aflatoxins in ready to eat nuts with the same NM, based on data submitted by countries and on evaluations by JECFA, considered therefore a consistent level of intake for a food that requires no further processing. Moreover, we deem appropriate the sampling plans presented by the Electronic Working Group.

EUROPEAN UNION

MAXIMUM LEVEL

- The EU has since 1999 a maximum level of 4 µg/kg aflatoxin total in ready-to-eat figs in place. Aflatoxins are amongst the most potent mutagenic and carcinogenic substances known and are genotoxic carcinogens, therefore possible maximum levels must be set at a level as low as reasonable achievable. Any increase of the maximum level has to be fully justified to ensure that the level under consideration reflects the lowest level achievable by applying good practices.

- Following the discussions at the 5th session of CCCF last year and further consideration of the proposed maximum level of 10 µg/kg aflatoxin total in ready-to-eat dried figs, the EU is in a position to accept the proposed maximum level only on the condition that it is combined with a strict sampling plan minimizing the consumers' risk. Furthermore, the EU is of the opinion that the maximum level of 10 µg/kg aflatoxin total proposed for ready-to-eat figs can be applied by the member countries to all dried figs in trade.

- The CCCF has decided to establish a maximum level only for aflatoxin total. The EU is of the opinion that considering that aflatoxin B1 is the most potent carcinogen within the group of aflatoxin compounds, the setting of a separate maximum level for aflatoxin B1, corresponding to the maximum level of 10 µg/kg for aflatoxin total, contributes to the protection of public health and is not in contradiction with the Codex maximum level of 10 µg/kg aflatoxin total.

SAMPLING PLAN

- Dried figs have a significantly larger particle size than other food commodities for which a maximum level for aflatoxin total has been established at Codex level (such as almonds, hazelnuts, pistachios and peanuts). Therefore, in order to achieve an equivalent level of representativeness, a larger sample is required for dried figs than for tree nuts and peanuts for the same lot size.

- Therefore the EU is proposing a sampling procedure whereby for a typical lot of 15 tonnes, 100 incremental samples of about 300 grams have to be taken throughout the lot, resulting in a 30 kg sample. This 30 kg sample has to be divided into 3 laboratory samples of 10 kg each to be homogenised and analysed separately. A lot is considered to be compliant with the maximum level only if all three laboratory samples are compliant with the Codex maximum level. The figure 2.5 on page 15 of document CX/CF 12/6/10 shows that with such a sampling procedure the consumers' risk is minimized while still maintaining an acceptable level of producers' risk

- Consequently the EU cannot agree on the proposed sampling plan for the control of aflatoxins in dried figs based on 100 incremental samples of about 200 grams resulting in an aggregate sample of 20 kg to be divided into 2 laboratory samples of 10 kg each to be homogenised and analysed separately whereby both laboratory samples have to be compliant with the Codex maximum level.

KENYA

Comments on the proposed draft Maximum Level for Total Aflatoxins (Annex I) and the Proposed draft Associated Sampling Plans (Annex II).

Kenya which was part of Electronic Working group supports the proposed ML of 10 µg/kg however, we would like the Committee to consider taking European Sampling plan as a base/draft to develop Sampling plan.

The EU Sampling plan has been operational for some time and it will be easier to use it than re-inventing the wheel.

USA

- The U.S. commends Turkey for conducting a sampling study to develop a method to evaluate the performance of aflatoxin sampling plan designs for dried figs. Since sampling plans are closely linked with MLs, it is important that the sampling plan is designed for a maximum level for total aflatoxins in dried figs that the Committee agrees to adopt.
- The U.S. can support the sampling plan for the proposed ML of 10 µg/kg and recommends that the proposed ML as well as the sampling plan be advanced to the next Step.