CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 7 **CX/CF 14/8/7**
February 2014

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Eighth Session
The Hague, The Netherlands, 31 March – 4 April 2014

DRAFT MAXIMUM LEVELS FOR DEOXYNIVALENOL (DON) IN CEREALS AND CEREAL-BASED PRODUCTS AND ASSOCIATED SAMPLING PLANS (AT STEP 7)

Comments at Step 6 in reply to CL 2013/24-CF submitted by Brazil, Costa Rica, Japan and Kenya

BRAZIL

(i) General Comments:

First of all, Brazil would like to stress the importance to have limits to protect human health and facilitate the international trade. It is important to have limits for raw cereals, considering that they account for the greatest volume of international trade; however it should be clear that the limits apply only to those intended for human consumption, unless the established levels also apply to animal feed.

We also suggest clarifying or removing the expression “prior to sorting and removal of damaged kernels”, because when the issue was discussed in the CCCF the meaning was the limit applying to the lot as it is. In the report, outside the context of the discussion, the meaning was confused. We consider that if the DON content is higher than the maximum level there is the possibility to reprocess the lot to achieve the standard or intend for another purpose, such as animal feed to more resistant species.

We recommend that the maximum level for DON in cereal-based food for infants and young children should apply in “dry matter”, considering the products covered by CODEX/STAN 74- 1981.

COSTA RICA

Costa Rica appreciates the opportunity to provide comments on circular letter CL 2013/24-CF for the establishment of maximum levels for DON in the foods referred to in the preceding paragraph.

Comment

Although Costa Rica does not have data to submit, we support the proposed levels by the working group for the following groups:

PRODUCT	MAXIMUM LEVEL	COMMENTS
Cereal-based foods for infants and young children*	0.2 mg/kg	ML applies to the commodity as consumed

* All cereal-based foods intended for infants (up to 12 months) and young children (12 to 36 months)

PRODUCT	MAXIMUM LEVEL	COMMENTS
Raw cereal grains (wheat, maize and barley)	2 mg/kg	ML applies to raw cereal grains prior to sorting and removal of damaged kernels. Associated sampling plan.
Flour, semolina, meal and flakes derived from wheat, maize or barley	1 mg/kg	

Justification:

Costa Rica is a country with a diet in which high amounts of cereal-based commodities, such as wheat and maize, are consumed and this is a concern for the protection of public health. Therefore, Costa Rica supports the proposed MLs for raw cereals and derivatives, and the different ML for infants and young children, because of the vulnerability of this population.

JAPAN

1. Japan would like to stress that CCCF should elaborate MLs based on sound science and in accordance with the Codex principles and policies.

   - The Risk Analysis Principle Applied by the Codex Committee on Contaminants in Foods in the Procedural Manual stipulates as follow:
     - CCCF's risk management recommendations to the CAC with respect to contaminants and toxins shall be guided by the principles described in the Preamble and relevant annexes of the Codex General Standard for Contaminants and Toxins in Food and Feed (GSCTFF)
   - The criteria for the establishment ofmaximum levels in food and feed in Annex I of GSCTFF stipulates in the 10th bullets of second paragraph of "Establishment of maximum levels"as follows:
     - The product as it should be analyzed and to which the ML applies, should be clearly defined.
     - In general,MLs are set on primary products.
     - Preferably the product should be defined as it moves in trade, with provisions wherenecessary for the removal of inedible parts that might interfere with the preparation and the analysis of thesample.

2. Since raw cereal grains are the most traded cereal products internationally on a weight basis,establishment of anMLfor raw cereal grains should be justified on the basis of above criteria.Japan supportsthe draft ML for DON in raw cereal grains (maize, wheat and barley).

3. The 4th CCCF (2010)agreed to restart work on MLs for DON and its acetylated derivativesin cereals and cereal based-products in view of the availability of sufficient occurrence data and the outcomes of 72nd JECFA, and it was clarified that these MLs for DON are to be applied to cereal commodities for human consumption not use as feed.Therefore, current notes and remarks on the MLs should be amend based on this fact as follows:

Product name	Maximum level (mg/kg)	Notes/Remarks
Raw cereal grains (wheat, maize and barley)	2	ML applies to raw cereal grains prior to sorting and removal of damaged kernels, except for products intended for animal feed
Flour, semolina, meal and flakes derived from wheat, maize or barley	1	Except for products intended for animal feed
Cereal-based foods for infants and young children*	0.2	ML applies to the commodity as consumed

* All cereal-based foods intended for infants (up to 12 months) and young children (12 to 36 months)

KENYA

We support the limits mentioned herein and the sampling plan.