

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 2, 5, 7, 8

CRD18

ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

13th Session
Yogyakarta, Indonesia, 29 April – 3 May 2019

Comments of India

AGENDA ITEM 2 - MATTERS REFERRED TO CCCF BY CAC AND/OR ITS SUBSIDIARY BODIES

The 75TH Session of the Executive Committee of the Codex Alimentarius Commission (CCEXEC75)

Guidelines for the management of (micro)biological foodborne crises/outbreaks

Comments: India supports the view of CCEXEC and the need for developing guidelines for the management of foodborne crisis/outbreaks arising due to chemical contaminants..

Rationale: In the past, there have been some instances of foodborne crisis/outbreaks arising due to chemical contaminants.

The 39th Session of the Committee on Methods of Analysis and Sampling (CCMAS39)

Sampling plans for MLs for methylmercury in fish

1. Section: Treatment of the sample as received in the laboratory

Comments: The text under this section may be modified as “The complete aggregate sample (**edible part**) should be finely ground.....”

2. Section: Fitness-for-purpose’ Approach: Bullet no. 2

Comment: In the second bullet, there is a mention of “point C.3.3.1”, however, the reference to point C.3.1.1 is not available in this document.

3. Table 7 Performance criteria for methods of analysis of methylmercury

i. Column “LOD”

Comment : For All tuna, the LOD mentioned is 0.12mg/kg. However, as per the performance criteria mentioned in the Table 5, the LOD should be 3/10th of LOQ. i.e. it should ideally be 0.072mg/kg. The same is observed for all the LODs mentioned in the table and hence need to be modified.

ii. Column “Precision (%) Not more than ”

Comment: The text in the 7th cell in the top row of table 7 may be modified as follow:

“Precision (%) Not more than **RSD R** (%)”

iii. Columns “Examples of Applicable method that meet the Criteria” and “Principle”

Comment: For “all tuna” under column “Examples of Applicable method that meet the Criteria”, the AOAC 988.11 method should be included and accordingly, GC-electron capture should be included in column “Principle”.

4. Section: Applicability

Comment: The text may be modified as_“The present interpretation rules should apply for the analytical result obtained on the sample for enforcement. In case of analysis for defence or reference purposes, the ~~locally applicable~~ **national** rules should apply”.

AGENDA ITEM 5 - PROPOSED DRAFT MLS FOR LEAD IN SELECTED COMMODITIES IN THE GSCTFF (CXS 193-1995) (AT STEP 4)

Proposed draft MLs for lead in selected commodities in the GSCTFF (CXS 193-1995) (at Step 4)

Comment: India proposes an ML of 0.15 mg/kg for lead in both Wine and fortified or liqueur wines.

Rationale: India has submitted occurrence data for lead in wines to GEMS/Food database which is supportive of an ML of 0.15 mg/kg (4.2 % trade rejection) or more. However, at an ML of 0.1 mg/kg and 0.05 mg/kg there will be 12.5% and 50% trade rejections respectively.

AGENDA 7 - DRAFT CODE OF PRACTICE FOR THE REDUCTION OF 3-MCPDES AND GES IN REFINED OILS AND FOOD PRODUCTS MADE WITH REFINED OILS (AT STEP 7)

Specific Comments: We propose to modify the text in Introduction clause No. 3 as follow:

"3-MCPDE and 3-MCPD have toxic effects on the kidney and male reproductive organs, and 3-MCPD is a non-genotoxic carcinogen. GE and glycidol are **probably** genotoxic carcinogens".

Rationale: Since the genotoxicity and carcinogenicity for GE and glycidol is not proven (or proven on rodent models), therefore it is better to write GE and glycidol are probably carcinogenic to humans.

AGENDA 8 - PROPOSED DRAFT ML FOR TOTAL AFLATOXINS IN READY-TO-EAT PEANUTS AND ASSOCIATED SAMPLING PLAN (HELD AT STEP 4)

Comment: India supports the recommendation of establishing an ML of 10µg/kg for AFT in RTE Peanuts.

Rationale: In the EWG established last year which was chaired by India, it was observed that there was general consensus for establishing 10 µg/kg ML for AFT in RTE Peanuts and therefore, EWG recommended an ML of 10 µg/kg for AFT in RTE Peanuts. In line with recommendation of EWG and to address immediate trade concerns, it would be appropriate even if the 10 ppb of AFT in RTE peanuts be established in the Committee.

Additionally, India has submitted the occurrence data for AFT specifically in RTE peanuts after implementation of the COP which also does not support any ML lower than 10µg/kg.