

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Items 5,6,7,8,9,10(a),11,12,13,14,18, and 20

CRD02

ORIGINAL LANGUAGE

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**CODEX COMMITTEE ON CONTAMINANTS IN FOODS**  
**14<sup>th</sup> Session**  
**(virtual)**  
**3-7 and 13 May 2021**

**Comments of Tanzania**

The United Republic of Tanzania (URT) Secretariat appreciates the opportunity to provide comments on the different agenda items to be discussed by the 14<sup>th</sup> session of the Codex Committee on Contaminants in Foods.

**Agenda Item 5: CX/CF 20/14/5**

**DRAFT ML FOR CADMIUM FOR CHOCOLATES CONTAINING OR DECLARING <30% TOTAL COCOA SOLIDS ON A DRY MATTER BASIS (AT STEP 7)**

**GENERAL COMMENT**

The URT would like to thank the Electronic Working Group chaired by Ecuador and co-chaired by Brazil and Ghana to prepare a work on MLs for the category of chocolates containing or declaring <30% total cocoa solids on a dry matter basis for consideration by CCCF14.

**SPECIFIC COMMENT**

The URT supports the adoption of 0.3 mg/kg ML of cadmium for chocolates containing or declaring <30% total cocoa solids on a dry matter basis.

**Justification**

Based on JECFA opinions on conducted risk assessment for cadmium; there is very low risk which is associated with cadmium in cocoa derived products such as chocolates (JECFA 77 of 2013). The level is also based on proportionality principle and can be achievable globally.

**Agenda Item 6: CX/CF 20/14/6**

**PROPOSED DRAFT MLs FOR CADMIUM IN CHOCOLATE AND CHOCOLATE PRODUCTS CONTAINING OR DECLARING ≥30% TO <50% TOTAL COCOA SOLIDS ON A DRY MATTER BASIS; AND COCOA POWDER (100% TOTAL COCOA SOLIDS ON A DRY MATTER BASIS) (AT STEP 4)**

**GENERAL COMMENT**

The URT would like to thank the Electronic Working Group chaired by Ecuador and co-chaired by Ghana to prepare a work on MLs for the categories of chocolate and chocolate products containing or declaring ≥30% to <50% (total cocoa solids on a dry matter basis) and cocoa powder (100% total cocoa solids on a dry matter basis) for consideration by CCCF14 using a proportional approach.

**SPECIFIC COMMENT**

**1. Chocolate and chocolate products containing or declaring ≥30% to <50% total cocoa solids on a dry matter basis**

The URT recommends 0.5 mg/kg ML of cadmium for chocolate and chocolate products containing or declaring ≥30 % to <50 % total cocoa solids on a dry matter basis.

**Justification**

According to the JECFA ninety-first meeting report, at 0.5 mg/kg ML the rejection rate is 2.1%.

## **2. Cocoa powder (100 % total cocoa solids on a dry matter basis)**

The URT recommends postponement of the development of ML of cadmium for Cocoa powder (100 % total cocoa solids on a dry matter basis) ready for consumption pending the implementation of the COP and generation of more data.

### **Justification**

The URT recommends that setting of ML for this category adjourned until the implementation of COP and its impacts are determined. The URT calls for JECFA's toxicological evaluation on the maximum limit of cadmium contaminant.

### **Agenda Item 7: CX/CF 20/14/7**

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## **PROPOSED DRAFT CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF CADMIUM CONTAMINATION IN COCOA BEANS (AT STEP 4)**

### **GENERAL COMMENT**

The URT would like to thank the Electronic Working Group chaired by Peru and co-chaired by Ecuador and Ghana for the development of a Code of Practice (COP) to guide Member States and the cocoa production industry in preventing and reducing cadmium (Cd) contamination in cocoa beans during the production and processing phases.

### **SPECIFIC COMMENTS**

#### **Clause 1, paragraph 1**

The URT proposes this paragraph to read as follows:

*"The objective of this proposed draft Code of Practice (COP) is to provide guidance to member states and the cocoa production industry on the prevention and reduction of cadmium (Cd) contamination in cocoa beans during production and post-harvest processing: fermentation, drying, storage including during any transportation that might be involved."*

#### **Justification**

Transportation could be a source of cross contamination of cadmium if not properly handled. In the least developed countries, transport of food products including cacao could be mixed with other materials (e.g. gasoline or soil) which are potential sources of cadmium

#### **Clause 1, paragraph 3**

The URT proposes to include the sentence that describe the toxic effects of Cadmium and to read as follows:

*'Cadmium exposure is associated with kidney, skeletal and lung diseases/disorders, and cancer'.*

#### **Justification**

To clarify the statement stating that cadmium is toxic.

#### **Paragraph 6**

The URT proposes to replace Cd<sup>+2</sup> with Cd<sup>2+</sup> in the paragraph.

#### **Justification:**

It is a standard way of presenting oxidation state of metal ions.

#### **Paragraph 9**

The URT proposes to add the letter "s" in a word source to read "sources".

#### **Justification:**

It is a grammatical error.

### **SPECIFIC COMMENT**

#### **Clause 2, Scope**

The URT proposes the scope to include the transport aspect and therefore to read as follows:

*"The scope of this Code of Practice is to provide guidance on recommended practices to prevent and reduce Cd contamination in cocoa beans before planting or for new plantations and during production stage through the harvest and post-harvest phase including during any transportation that might be involved."*

#### **Justification**

Transportation could be a source of cross contamination of cadmium if not properly handled. Including transport in the scope puts more emphasis on this part of the chain, which is not given the required attention by smallholder farmers and traders.

**SPECIFIC COMMENTS****Clause 3, definition of Sea-salt aerosols**

The URT proposes the definition to rephrase to be clear and read as *“The suspension of fine solid particles or liquid droplets in air originating from sea salt.”*

**Justification**

To improve clarity.

**Clause 3, definition of Phytoremediation**

The URT proposes to delete the term “bioremediation” from the definition to read, *“It is a process that uses various types of plants to remove, transfer, stabilize, and/or destroy contaminants in the soil and groundwater”*.

**Justification**

To improve clarity.

**Clause 3, definition of Bioavailability**

The URT proposes to delete the word “in nutrition” in the definition and the rest of the texts after the first sentence of definition. The definition of Bioavailability to read, *“Bioavailability of a mineral can be defined as its accessibility to normal metabolic and physiological processes”*.

**Justification**

To improve clarity.

**Clause 3, definition of Adsorption, Absorption and Desorption**

The URT proposes the definitions of Adsorption, Absorption and Desorption to be separated and defined independently as follows:

- (i) The definition of Adsorption to read *“Physical, chemical or exchange adsorption is a concept that refers to the attraction and retention that a body makes on its surface of ions, atoms or molecules that belong to a different body”*.
- (ii) Definition of Absorption to read *“is a term that refers to the attraction developed by a solid on a liquid with the intention that its molecules penetrate into its substance; to the ability of a tissue or a cell to receive a material that comes from its outside”*.
- (iii) Definition of Desorption to read *“is the process of removing an absorbed or adsorbed substance”*.

**Justification**

The terms are proposed to be separated because they have different meaning and for uniformity and clarity.

**Clause 3, definition of Cation Exchange Capacity (CEC)**

The URT proposes the definition of Cation Exchange Capacity (CEC) to be refined to read, *“It is a measure of the soil’s ability to hold positively charged ions. It is a very important soil property influencing soil structure stability, nutrient availability, soil pH and the soil’s rURTtion”*.

**Justification**

To improve clarity.

**Clause 3, definition of redox rURTtion**

The URT proposes the definition of redox rURTtion to be refined to read, *“Is the rURTtion in which oxidation and reduction occur simultaneously”*.

**Justification**

To improve clarity.

**Clause 3, definition of Complexation rURTtion**

The URT proposes the definition of complexation rURTtion to be rephrased to read, *“It is a rURTtion that forms a complex compound. A complex compound is composed of a central metal ion to which other groups are covalently bonded”*.

**Justification**

To improve clarity.

**Clause 3, definition of Electrical conductivity**

The URT proposes the definition of Electrical conductivity to be refined to read, *“Is a fundamental property of a material that quantifies how strongly it resists or conducts an electric current”*.

**Clause 3, definition of drying process**

The URT proposes the definition to be rephrased to read *“Is a process used to reduce the moisture content of cocoa beans with methods such as sun drying, mechanical/solar drying (or a combination of both)”*.

**Justification**

To improve clarity and not to limit the technology.

**Clause 3, definition of validation**

The URT proposes the definition to be rephrased to read *“Obtaining evidence that a control measure or combination of control measures are effective.”*

**Clause 3, definition of pruning**

The URT proposes to delete the word “annually” from the definition.

**Justification**

Pruning can be done several times and not only annually as pointed out.

**SPECIFIC COMMENT****Clause 4.1**

The URT proposes this paragraph to include more sources of cadmium as appears in the second paragraph of the introduction section. Therefore, this paragraph is proposed to read:

*“Install plantations in areas far from roads or take measures to reduce the exposure of the cacao plantations to gases emitted by the combustion of vehicles because they may contain Cd (roads should be spaced 200 meters away from the cacao plantation). Likewise, they should be located in areas separated from dumps in cities, mining areas, smelting areas, industrial wastes, sewage and household waste water.”*

**Justification**

For clarity and accommodation of potential sources that may need intervention to reduce cadmium exposure.

**Clause 4.2**

The URT proposes this section to include a paragraph that touches on fertilizers used in cocoa plantations. The proposal to read as follows:

*“The fertilizers applied during production should meet the specified criteria in relation to cadmium levels”*.

**Justification**

Fertilisers could be potential sources of cadmium contamination.

**Paragraph 14**

The URT proposes the scientific name (Erythrina sp.) in the paragraph to be italicized and improved to read *“Erythrina spp”*.

**Justification**

Its typographical and the standard way of writing scientific names.

**Paragraph 23**

The URT recommends having consistency in use of the words “sulphate” versus “sulfate” in the document.

**Justification**

To ensure consistency.

**Paragraph 37**

The URT proposes the genus name Streptomyces to be italicized and the letter “p” added to read *“Streptomyces spp.”*

**Justification**

It is typographical and the standard way of writing the scientific names.

**Paragraph 45**

The URT proposes the scientific name for *Saccharomyces cerevisiae* to be italicized to read "*Saccharomyces cerevisiae*".

**Justification**

It is the standard way of writing the scientific names.

**Agenda Item 8: CX/CF 20/14/8**

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**PROPOSED DRAFT MLs FOR LEAD IN SELECTED COMMODITIES FOR INCLUSION IN THE GSCTFF (CXS 193-1995) (AT STEP 4)****GENERAL COMMENTS**

The URT would like to thank the Electronic Working Group chaired by Brazil for the good work and commitment to come up with the proposals for MLs for lead in eggs and egg products; aromatic herbs and spices; food for infant and young children; sugar and confectionery, excluding cocoa, for members' comments to protect the health of consumers and facilitate trade globally.

**SPECIFIC COMMENT**

The URT recommends postponement of the process of setting the MLs for lead in eggs, culinary herbs and spices until the data from all regions in the world and assessment of impacts of the revised COP are taken into consideration.

**Justification**

The proposed levels have not taken into consideration data from all regions of the world including Africa. Consideration of data from the affected regions in the world including Africa will help to set reasonable MLs that reduce rejection rates to acceptable levels. The application of the COP will surely make our commodities compliant to the proposed limits while inclusion of data from Africa will make the MLs geographically representative.

**Agenda Item 9: CX/CF 20/14/9**

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**PROPOSED DRAFT REVISION OF THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF LEAD CONTAMINATION IN FOODS (CXS 56-2004) (AT STEP 4)****GENERAL COMMENTS**

The URT would like to thank the Electronic Working Group chaired by the United States of America, co-chaired by the United Kingdom and Japan for the work done to come up with the revised Code of Practice for the Prevention and Reduction of Lead Contamination in Foods for members' comments to protect the health of consumers and facilitate trade globally.

The URT also proposes to include a section of interpretation or definition of terminologies used in the COP.

**SPECIFIC COMMENT****Clause 1, Paragraph 4**

The URT proposes to add the words "solid wastes" as among the sources of lead contamination in soil.

**Justification**

Solid wastes are composed of different materials including batteries, packaging materials, paints' containers, construction and demolition, which can be sources of lead contamination in the soil.

**SPECIFIC COMMENT****Clause 1.2, Paragraph 13**

The URT proposes to add a sentence that read as follows:

*"Soils determined to contain high levels of lead should not be used for farming food crops which may accumulate lead unless appropriate interventions to reduce lead availability are applied"*

**Justification**

To complement the information provided in that section/paragraph and guide on what to be done in case the soil is found to contain high levels of lead.

**Clause 1.2, Paragraph 26**

The URT proposes this paragraph to include Agricultural water for animals to read as follows:

*"Agricultural water for livestock consumption should be protected from sources of lead contamination and monitored for lead levels to prevent or reduce lead contamination of livestock products (milk, meat and eggs). For example, well water/river sources used for direct livestock consumption/farming should be properly protected to prevent contamination and the water should be routinely monitored"*

**Justification**

Water could be contaminated with lead, which may subsequently contaminated crops; therefore, it should be protected from any potential sources.

**Clause 1.2, Paragraph 32**

The URT proposes to add “or the latest version” to the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995).

**Justification**

To accommodate any future updates of the stated standard because standards are revised regularly.

**Agenda Item 10(a): CX/CF 20/14/10**

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**PROPOSED DRAFT MLs FOR TOTAL AFLATOXINS IN CERTAIN CEREALS AND CEREAL BASED PRODUCTS INCLUDING FOODS FOR INFANTS AND YOUNG CHILDREN (AT STEP 4)****GENERAL COMMENT**

The URT would like to thank the Electronic Working Group chaired by Brazil and co-chaired by India for preparation of proposals for MLs for total AFs in maize grain destined for further processing, flour, meal, semolina and flakes derived from maize, husked and polished rice (excluding parboiled rice), cereal-based food for infants and young children and sorghum for members' comments to protect the health of consumers and facilitate trade globally.

**SPECIFIC COMMENT**

1. The URT does not support the proposed maximum levels for total aflatoxins in certain cereals and cereal based products (at Step 4). The harmonized limit set for the East African community standards is 10 µg/kg for total aflatoxins and 5 µg/kg for aflatoxin B1.

**Justification**

MLs should be established based on the ALARA (as low as reasonably achievable) principle. The ML for aflatoxins should be as low as possible due to their genotoxicity. Consideration needs to be given to population groups that are extremely vulnerable.

2. The URT supports the adoption the maximum level of 2 µg/kg total aflatoxins for cereal-based foods for infants and young children.

**Justification**

Infants and young children are vulnerable group, there is need to protect them against aflatoxin exposure.

**Agenda Item 11: REP18/CF, para. 115**

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

The URT would like to thank the Electronic Working Group chaired by India to prepare a work on MLs for the category of chocolates containing or declaring <30% total cocoa solids on a dry matter basis and cocoa for consideration by CCCF14.

**SPECIFIC COMMENT**

The URT supports the setting of a ML for total aflatoxins in ready-to-eat (RTE) peanuts and associated sampling plan (Held at Step 4) at 10 µg/kg.

**Justification:**

The URT recommends that the setting of MLs at 10 µg/kg should be established on the basis of the ALARA (as low as reasonably achievable) principle, ML for RTE peanuts should be lower than that set for peanuts for further processing (15 µg/kg) as this implies that processing can further reduce the contamination level. The approach for setting ML for RTE peanuts should be comparable to those used to set MLs for almonds, Brazil nuts, hazelnuts and pistachios in which there is a distinction between RTE and further processing. The ML for aflatoxins should be as low as possible due to their genotoxicity and consideration needs to be given to population groups that are extremely vulnerable.

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**Agenda Item 12: REP18/CF, para. 119 Appendix VIII**

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**PROPOSED DRAFT MLs FOR TOTAL AFLATOXINS AND OCHRATOXIN A IN NUTMEG, DRIED CHILI AND PAPRIKA, GINGER, PEPPER AND TURMERIC AND ASSOCIATED SAMPLING PLANS (HELD AT STEP 4)****GENERAL COMMENT**

The URT would like to thank the Electronic Working Group chaired by India to prepare a work on MLs total aflatoxins and ochratoxin a in nutmeg, dried chili and paprika, ginger, pepper and turmeric and associated sampling plans for consideration by CCCF14.

**SPECIFIC COMMENT**

The URT recommends for postponement of the setting of maximum levels for total aflatoxins and ochratoxin A in nutmeg, dried chili and paprika, ginger, pepper and turmeric and associated sampling plans (Held at Step 4) to allow for inclusion of data from more codex members and data on the implementation of the revised Code of Practice. URT supports the revision of MLs and possibly establish MLs for specific spices based on new data generated after three years of implementing the COP.

**Justification**

URT recommends that the setting of the MLs be postponed to allow more data from all regions of the globe and implementation of the revised code of practice. The application of the COP will surely make our commodities compliant to the proposed limits while inclusion of data from Africa will make the MLs geographically representative. The code of practice was adopted in 2017. It is premature to set MLs after a year of adopting a COP. Comparative analysis of occurrence data generated before and after the implementation of the COP will not only serve as an assessment of the effectiveness of the COP but also will lead to setting of better health and trade protective limits.

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**Agenda Item 13: CX/CF20/14/11**

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**DISCUSSION PAPER ON MAXIMUM LEVELS FOR METHYLMERCURY IN ADDITIONAL FISH SPECIES****GENERAL COMMENT**

The URT would like to thank the Electronic Working Group chaired by New Zealand and co-chaired by Canada for the work done on the preparation of discussion paper on establishing MLs for additional fish species for members' comments to protect the health of consumers and facilitate trade globally.

**SPECIFIC COMMENT**

The URT supports the recommendations for the CCCF to consider establishment of MLs for methylmercury for additional species identified in the list (Appendix I, CX/CF 20/14/11) and for further data collection and potential inclusion at a later stage.

**Justification**

Fish contributes to methylmercury exposure, which affects human health. The toxicity of methylmercury may have reproductive consequences. Pregnant women who eat fish and seafood contaminated with methylmercury may have the increased risk of having miscarriage, or having babies with deformities or severe nervous system diseases.

Getting data from Africa will provide more insight on safety of the fishes and possibility of establishing new MLs.

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**Agenda Item 14: CX/CF20/14/11**

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**DISCUSSION PAPER ON MLs FOR HCN IN CASSAVA AND CASSAVA-BASED PRODUCTS AND COP FOR THE PREVENTION AND REDUCTION OF MYCOTOXIN CONTAMINATION IN CASSAVA AND CASSAVA-BASED PRODUCTS****GENERAL COMMENT**

The URT would like to thank the Electronic Working Group chaired by Nigeria and co-chaired by Ghana to prepare a discussion paper establishing maximum level for HCN in cassava and cassava-based products and COP for the prevention and reduction of Mycotoxin contamination in cassava and cassava-based products for members' comments to protect the health of consumers and facilitate trade globally.

**SPECIFIC COMMENT**

Tanzania supports the following recommendations made by the EWG as follows:-

(a) *To await for availability of further data for HCN in cassava and cassava products to re-assess the need and feasibility to establish MLs for cassava and cassava products.*

**Justification**

To generate enough information to come up with evidence-based MLs for HCN in cassava and cassava products

*(b) To develop a Code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava products.*

**Justification**

To prevent and reduce mycotoxin contamination in cassava and cassava products along the value chain.

**Agenda Item 18: CX/CF 20/14/16**

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**DISCUSSION PAPER ON THE APPROACH TO IDENTIFY THE NEED FOR REVISION OF STANDARDS AND RELATED TEXTS DEVELOPED BY THE CODEX COMMITTEE ON CONTAMINANTS IN FOODS**

**GENERAL COMMENT**

The URT would like to thank the Electronic Working Group (EWG), chaired by Canada and co-chaired by Japan and the United States of America (USA), working in English, to prepare a proposal for an approach to identify the need for review of existing CCCF standards for consideration at CCCF14.

**SPECIFIC COMMENT**

The URT supports the proposal and the on-going work of development of a work plan to strategically establish or prioritize items within its workload by the CCCF.

**Justification**

Having a longer-term forward planning has value to identify areas of concern for public health with trade implications, thus allowing for data gathering well in advance to inform JECFA evaluation or re-evaluation, and to update/supplement existing standards.

**Agenda Item 20: Rep19/CF-Appendix X**

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**PRIORITY LIST OF CONTAMINANTS AND NATURALLY OCCURRING TOXICANTS FOR EVALUATION BY JECFA GENERAL**

**GENERAL COMMENT**

The URT would like to thank the Codex Secretariat with the assistance of the JECFA and Host Country Secretariats to come up with the recommendations made in relation to the priority list and the follow-up to the outcomes of JECFA evaluations for consideration by CCCF14.

**SPECIFIC COMMENT**

The URT supports the idea of developing priority lists of contaminants and naturally occurring toxicants for evaluation by JECFA.

**Justification**

The naturally occurring chemicals in the priority list (dioxins and dioxin-like PCBs, Arsenic (inorganic and organic arsenic), scopoletin, ergot alkaloids, trichothecenes (T2, HT2) are relevant to Africa.