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 - www.codexalimentarius.org

Agenda Items 5,6,7,8,10a, 10b,13 and 14 **CRD06**

ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON CONTAMINANTS IN FOODS
14th Session
(virtual)
3-7 and 13 May 2021
Comments of Uganda

Agenda Items 5 and 6: Maximum level for cadmium in chocolates containing or declaring <30% total cocoa solids on a dry matter basis (at Step 7) and Maximum levels for cadmium in chocolates 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)

Uganda suggests that ML for Cd in Cocoa and chocolate products should be specified as a "maximum limit" and not a range; a maximum limit is suggested since cadmium is a heavy metal contaminant. The range is not practical, based on our data we suggest;

9.1) Uganda agrees to retain the ML of 0.3 mg/kg for chocolates containing or declaring <30% total cocoa solids on a dry matter basis at Step 7.

9.2) Uganda supports 0.5 mg/kg Maximum limits for ≥30% to <50% total cocoa solids on a dry matter basis as per JECFA evaluation.

Uganda has a reservation on the set limits from JECFA evaluation on cocoa powder with 100% total cocoa solids on a dry matter basis.

Justification: Basing on Uganda's laboratory data on presence of Cd in Cocoa, ML of 0.3 mg/kg is a benchmark for most of the samples obtained from different regions of the country. However, Uganda supports 0.5 mg/kg Maximum limits for ≥30% to <50% total cocoa solids on a dry matter basis as per JECFA evaluation. Uganda recommends that setting of ML category for 100% total cocoa solids be postponed until the implementation of COP and its impacts are determined and generation of more data.

Agenda Item 7: Code of practice for the prevention and reduction of cadmium contamination in cocoa beans (at Step 4)

Uganda appreciates the work done and willing to participate actively during sub-sequate stages of COP development.

Agenda Item 8: Maximum levels for lead in certain food categories (at Step 4)

Uganda proposes 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 Items 10a) and 10b): Maximum levels for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children (at Step 4) and Sampling plans and performance criteria for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children

10a) Maximum levels of aflatoxins

Uganda proposes need to consider adoption of maximum levels for aflatoxins for Maize grain destined for further processing, Husked rice, polished rice, Flour, meal, semolina and flakes derived from maize based on harmonised East African standards for example; (10 µg/kg AFT and 5 µg/kg B_1 for maize grains, Milled maize products, whole sorghum grains and paddy rice).

Uganda agrees with the maximum levels of 2 µg/kg AFT for cereal-based foods for infants and young children.

Justification: For consumer safety and health, 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.

10b) Table 1. Subdivision of maize sub lots according to lot weight;

Uganda proposes need to include a note that ''100 increment is based on the sub lots, for example; when you sub lot, samples must be taken from all the sub lots.

Table 3. Performance criteria for Total Aflatoxins;

Uganda proposes need to adjust minimum applicable range to commensurate with the respective ML suggested as per the changed maximum limits for aflatoxin in East African products standards (10 µg/kg AFT and 5 µg/kg B_1) as per the EAC existing standards.

Uganda seeks for clarity on the double commodities naming under table 3, both having sample commodity name but different MLs and other parameters.

Uganda seeks for clarity on detection methods used, the LOD is too high. That would mean the method is not a good one (cannot easily detect aflatoxins) yet there are methods that can detect as low as 0.01 µg/kg (ppb).

Justification: For clarity to the standard users.

Agenda Item 13: Methylmercury in fish

Uganda has a reservation on the maximum limits for methyl-mercury and sampling plan for the two species (Orange roughy and cask eel).

Justification; No available country data on MLs for methyl-mercury and sampling plan for the Orange roughy and cask eel fish species. In addition, these are rare species that we currently do not trade in.

Agenda Item 14: Hydrogen cyanide and mycotoxin contamination in cassava and cassava-based products

Uganda proposes postponement of work on maximum levels of HCN in cassava and cassava-based products and to await availability of further data and information to re-assess the need and feasibility to establish MLs for cassava and cassava-based products.

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

a)YES, Uganda agrees that there is need to develop a code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava products.

Justifications:

- Uganda is a major producer of cassava crop and has high levels of cassava products industrialization and consumption rate. However, there are safety and quality issues with cassava hindering its trade thus need for development of a code of practice to manage the practices that could lead to cassava and cassava products contamination.
- Availability of data for mycotoxin contamination for mishandled cassava and cassava products.
- Cassava products are used as components/ raw materials in composite flours and other foods for vulnerable groups, thus its contamination can affect the final product safety hence compromising the consumer health and safety.
- Cassava and cassava products are also affected by other contaminants which cause toxicological adverse effects thus need for a code of practice to prevent any form of contamination in the product.
- Existence of a large national and international market for food, animal feeds and industrial products for cassava in case it is of good quality.

b) Uganda agrees, it is feasible to develop a COP for cassava and cassava products at pre and post-harvest handling stage.

Justification: Existence of comparison data for cassava and cassava products with mycotoxin contamination when a good Code of management practices is followed and when the COP is un complied with.

c)YES. To include particular issues that are of concern to Uganda

Uganda's additional comments on Agenda Item 14 - COP for prevention of mycotoxins in cassava and cassava products discussion Paper.

Question #	Description	Responses/Comments
c)	Whether there is room for the EWG to further develop the discussion paper	• The discussion paper dwells more on product and processing literature from West Africa even though cassava is a major crop in all regions. The relevance of the COP could be increased if context-specific information is included. • For instance, inclusion of local products for example. "Chwada", a cassava bread made from either fermented or unfermented cassava flour to Table 1 (Pages 10 – 12) could be interesting. It is commonly consumed in Eastern and Northern Uganda.
d)	Provide information on good management practices currently available that are proven to be effective and applicable worldwide to control mycotoxin contamination in cassava and cassava-based products to supplement the information provided in Appendix I to CX/CF 20/14/12. If such information is available from the website, please provide links. If the publication can be provided as an attachment, please send the file directly to the EWG Chair: adegboye.a@nafdac.gov.ng cc to codexsecretariat@son.gov.ng and codex@fao.org.	• The discussion on prevention of mycotoxins contamination is exhaustive, Uganda appreciates. However; • A number of good agricultural practices exist and farmers are being trained in their use. These include site selection, land preparation, planting, weeding and harvesting. Ridging has been recently introduced and has preliminary findings from farmer observations have indicated they assist in having robust growth. However, there is need to assess these practices in as far as preventing or reducing mycotoxin in cassava is concerned. • Uganda has a number of improved cassava varieties in terms of yield and disease resistance. Over 20 improved varieties have been released by the National Agricultural Research Organization (NARO). Their resistance to fungal attack needs to be validated. In addition to the improved varieties, there are landraces that are market preferred. These too need to be analyzed. • During harvesting, cassava should not be injured as this accelerates the spoilage and possible contamination. This practice however is easier during the wet season as the soils are soft. • Several drying methods are currently in use. They include sun-drying, solar drying, flush drying. All these methods reduce moulds infestations in cassava. However, the efficiency of these methods needs to be analyzed. • Two categories of cassava exist in Uganda such as bitter and sweet. Different processing methods are in application in order to process cassava flour that is safe. Also, both fermented and unfermented products are processed.

Question #	Description	Responses/Comments
e)	Provide other considerations as may be appropriate. Such considerations may be: Identification of key points to consider for the development of the COP (e.g. scope and relevant mycotoxins based on management practices available); key Codex texts that should be referenced to complement the application of this COP; any other key points Codex members / observers consider relevant for the development of the COP.	• Following a review of the discussion paper, we find limited discussions on HCN levels in deep fried cassava products. Fried cassava is a common form in which cassava is consumed in Uganda, a snack at schools and a major street food. • Most strategies discussed in the paper rely on the high solubility of cyanides in water to remove or reduce their concentration. The low solubility in fats/oils result in retention of HCN in fried cassava chips and crisps. • There is literature that highlights concern over the safety of fried cassava products. The following are some of the studies that reported high cyanogenic glycosides retention in fried cassava products. o Bandna, C. (2019). Effect of processing on the cyanide content of cassava products in Fiji. *Journal of Microbiology, Biotechnology and Food Sciences*, *2019*, 947-958. o Ginting, E. (2013). Cyanide reduction in cassava root products through processing and selection of cultivars in relation to food safety. *Buletin Palawija*, (25), 26-36. • Do we assume that the varieties used for such products are not the bitter (high CN-) kind? Proposed scope can also cover; • This Code of Practice intends to provide guidance on how to produce cassava and cassava products with safe levels of mycotoxins and affatoxins. The scope should include issues along the entire cassava value chains. Another area of investigation is the issue of optimum maturity levels in as far as such time could impact on the vigour of growth.