

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

4th Session
Izmir, Turkey, 26 – 30 April 2010

PROPOSED DRAFT MAXIMUM LEVELS FOR TOTAL AFLATOXINS IN BRAZIL NUTS (N11-2008)

Comments at Step 3 submitted by Argentina and Norway

ARGENTINA

Argentina appreciates the opportunity to put forward the following comments on this document.

Annex III:

BACKGROUND INFORMATION - INTRODUCTION

We think paragraphs 2 through 5 should be deleted since they offer very general information that is not relevant in a proposed draft for maximum levels.

Concerning paragraph 6, we consider it could be spelled out as follows:

6. Particularly, in the case of Brazil nuts, conditions in the Amazonian environment and the characteristics of its extractivism activity (collecting and primary handling) cannot be controlled, exerting direct or indirect effects on the toxigenic fungi and aflatoxin production.

AFLATOXINS ON BRAZIL NUTS

We think that in paragraph 30 there is a translation problem and that it should be revised as follows:

30. En su evaluación de la ~~ingestión~~ *ingesta* a través de los alimentos en su 68^a reunión, el JECFA utilizó datos sobre la contaminación por aflatoxinas de países productores. La concentración mediana del contenido total de aflatoxinas en las nueces del Brasil (sin cáscara) era de 20 µg/kg (FAO/OMS, 2008).

In paragraph 38 there is a translation problem as well, and the text should be:

38. Todas las muestras del proyecto Conforcast (con cáscara y los granos) fueron analizadas para el contenido de aflatoxinas B₁, B₂, G₁ y G₂ por HPLC-FL con derivatización post-columna utilizando una ~~célula~~ *celda* electroquímica, con criterios de rendimiento según la Norma de la Comisión Europea 401/2006.

NORWAY

Norway wishes to thank Brazil and the contributing delegations for preparing the paper on proposed draft maximum levels for total aflatoxins in Brazil nuts.

Aflatoxins pose a substantial hazard to human and animal health as they are genotoxic and carcinogenic. The European Food Safety Authority (EFSA) has stated that intake should be reduced to levels as low as reasonably achievable, and that priority should be given to reducing the numbers of highly contaminated foods reaching the market, irrespective of the commodity involved. JECFA has also noted that reduction of aflatoxin exposure is an important health goal.

Risk management of aflatoxins in Brazil nuts on the other hand seems to be a special case. Our understanding is that the Brazil nut tree only grows in the wild, and that extractivism is important for the native people, both social and economical. Nevertheless, good practice is very important, and we support the work already discussed in the *“Proposed draft revision of the code of practice for the prevention and reduction of aflatoxins in tree nuts (additional measures for brazil nuts)”*

The present document recommend three commodities for Brazil nuts in international trade: Shelled - ready to eat 10 µg/kg, shelled - for further processing 15 µg/kg and in-shell 20 µg/kg. Norway supports the proposed level of 10 µg/kg and 15 µg/kg for shelled nuts-ready to eat and shelled nuts -for further processing, respectively.

We do not support a separate maximum level for in-shell nuts. Other tree-nuts which have maximum levels in Codex (Almonds, Hazelnuts and Pistachios) are also traded internationally in-shell, with only two maximum levels: for further processing and ready-to-eat. The two maximum levels proposed for shelled Brazil nuts also apply for in-shell kernels, and we do not see the need for this extra maximum level for Brazil nuts. To maintain legislation consistency with other tree nuts would also aid international trade.

In addition, while some bad Brazil nut kernels may (or may not) be sorted out by the consumer, the burden of selecting good nuts should not as a principle be left to the consumers.

We look forward to discuss the topic further at the 4th session of the CCCF.