

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4.2

CAC/44 CRD/12
Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX ALIMENTARIUS COMMISSION Forty-fourth Session

Work from the Codex Committee on Contaminants in Food (CCCF) for adoption or approval by the Commission

Standards and related texts submitted for final adoption

Proposed MLs for cadmium in chocolates containing or declaring <30% total cocoa solids on a dry matter basis (CXS 193-1995)

Comments of El Salvador and Ghana

El Salvador

El Salvador apoya la adopción en trámite 8 y 5/8 respectivamente de las siguientes disposiciones:

- Niveles máximos (NM) de cadmio propuestos en chocolates que contienen o declaran <30 % del total de sólidos de cacao sobre la base de materia seca (CXS 193-1995)

Ghana

Position: Ghana supports the adoption of proposed draft ML of 0.3mg/kg for cadmium in chocolates containing or declaring <30% total cocoa solids on a dry matter basis.

Rationale: JECFA 91 (2021) evaluation of the GEMS/Food contaminants database showed that of the 4008 records for chocolates it was only possible to establish percentage cocoa solids for 638 (15.9%). Of this number, 114 samples of chocolate contained less than 30% total solids on a dry weight basis. Using the proposed ML of 0.3mg/kg, a rejection rate of 2.6% was obtained which is well below the 5% normally accepted in Codex. CCCF14 (2021) therefore agreed to advance the ML of 0.3mg/kg to Step 8 for adoption by CAC44 (Appendix II), noting the reservations of the European Union, Norway and Egypt to this decision. Based on this low rejection rate of 2.6% and the fact that no new information has been brought forward to justify a change in the ML by CCCF14, Ghana supports that CAC44 adopts the ML of 0.3mg/kg for cadmium in chocolates containing or declaring <30% total cocoa solids on a dry matter basis at Step 8.

Proposed MLs for cadmium in chocolates containing or declaring $\geq 30\%$ to <50% total cocoa solid on a dry matter basis (CXS 193-1995)

Comments of El Salvador and Ghana

El Salvador

El Salvador apoya la adopción en trámite 8 y 5/8 respectivamente de las siguientes disposiciones:

- NM de cadmio propuestos en chocolates que contienen o declaran entre $\geq 30\%$ y <50 % del total de sólidos de cacao sobre la base de materia seca (CXS 193-1995)

Ghana

Position: Ghana supports the adoption of the proposed draft ML of 0.7mg/kg for cadmium in chocolates containing or declaring $\geq 30\%$ to $< 50\%$ total cocoa solid on a dry matter basis

Rationale: JECFA91 (2021) has further confirmed that the presence of cadmium in chocolate was not a significant public health concern. The ranges of MLs (0.5 – 0.6mg/kg; 0.6 – 0.7mg/kg proposed for this category of chocolates were all protective of consumers' health on a global basis and therefore the focus was on considering an ML with a minimum negative impact on trade that could best accommodate all regions concerned. The ML of 0.7mg/kg accounts for rejection rates of 5.7% (worldwide basis) and 7.3% (Latin America and the Caribbean) and 0% (Africa) which gives a reasonable compromise both globally and regionally bearing in mind that a rejection rate of 5% is what is usually acceptable in Codex.

Amendment to the MLs for lead in fruit juices (CXS 193-1995)

Comments of GhanaGhana

Position: Ghana supports the proposed text of clarification to be included in General Standard for Contaminants in Food and Feeds.

Rationale: The data provided did not support the proposed change from current limits to 0.02 mg/kg as proposed by EU. It will be important to gather necessary supportive data before such variation is introduced.

Revision of the Code of practice for the prevention and reduction of lead contamination in foods (CXC 56-2004)

Comments of GhanaGhana

Position: Ghana supports revisions to the Code of Practice for the Prevention and Reduction of Lead Contamination in foods (CXS 56-2004). The revision was comprehensive enough for the revised CoP to be considered for adoption at step 5/8.

Rationale: The discussion paper which was submitted at CCCF 13 provided enough additional information available on lead sources and mitigation strategies to justify the revision of the 15-year-old COP. The additional sources of exposure to lead and mitigation strategies identified in the document are applicable and achievable in Africa. Invariably, the implementation of the revised COP will be protective of public health and international trade of the continent.

Standards and related texts submitted for adoption at Step 5

Proposed draft Code of practice for the prevention and reduction of cadmium contamination in cocoa beans

Comments of PhilippinesPhilippines

The Philippines supports the advancement to Step 5 of the proposed Code of practice for the prevention and reduction of Cadmium contamination in cocoa beans.

Rationale:

The Philippines is one of the top cocoa-producing country and this Code of Practice will be helpful in the reduction of Cadmium in our cocoa products.

The Philippines will further discuss its detailed comments at the next CCCF session.

Proposals to elaborate new standards and related texts

Proposal for new work on MLs for methylmercury in orange roughy and pink cusk eel (CXS 193-1995)

Comments of Ghana and Philippines**Ghana**

Position: Ghana supports the proposal for new work on the establishment of MLs for methylmercury in orange roughy and pink cusk eel.

Rationale: CCCF12 (2018) agreed that consistent with the approach taken for the establishment of MLs for lead, the methylmercury ML proposal that would be agreed upon would be those based on the next higher ML resulting in a trade rejection rate lower than 5%. Having established the criteria for development of ML, based on ALARA principle and considering the trade volumes of this species on the international market, it is important to prioritize establishment of the ML in the species.

Philippines

The Philippines supports the establishment of MLs for methylmercury in orange roughy and pink cusk eel as new work.

Rationale:

The Philippines has a proposed research project on the establishment of the ML of methyl mercury in seafoods (snapper, cuttlefish and catfish). This new work proposal on MLs for methylmercury in orange roughy and pink cusk eel (CXS 193-1995) can serve as an additional data for comparison on the contaminant levels among seafoods.

Proposal for new work on development of a Code of practice for the prevention and reduction of mycotoxins contamination in cassava and cassava-based products

Comments of Ghana, Philippines and Thailand**Ghana**

Position: Ghana supports the proposal for new work on the development of Code of Practices (CoP) for the prevention and reduction of mycotoxins in cassava and cassava based products.

Rationale:

Aflatoxins are known hepatotoxins causing the death of people and have been documented as naturally occurring carcinogens, which are primarily associated with high incidence of liver cancer. Aflatoxin B1 has particularly been identified as causative factor in the development of hepatocellular carcinoma, an emerging chronic disease of global concern.

The toxicity of ochratoxin A (OTA) has been reviewed by the International Agency for Research on Cancer (IARC), which classified OTA as a possible human carcinogen (Group 2B) and also by the Joint FAO/WHO Expert Committee on Food Additives (JECFA). OTA is a mycotoxin that occurs naturally worldwide in food commodities including roots and tubers and their products. In roots and tubers, *Fusarium* species have been implicated as pre-harvest fungi that produce mycotoxins, while *Aspergillus* and *Penicillium* species have been implicated as post-harvest fungi that produce mycotoxins, when conditions are favourable.

Hence the need to support the development of the CoP.

Philippines

The Philippines supports the new work on the development of Code of practice for the prevention and reduction of mycotoxins contamination in cassava and cassava-based products.

Rationale:

Philippines, being both a producer and consumer of cassava and cassava-based products, recognizes the benefits on the development of code of practice for the prevention and reduction of mycotoxins contamination.

Thailand

Thailand has no objection with the proposal to undertake this new work on development of Code of practice for the prevention and reduction of mycotoxins contamination in cassava and cassava-based products. For Section 1 Purpose and scope of the new work in the project document, we would like to seek a clarification whether or not the scope of this new work includes cassava intended for feed production since a large amount of cassava is used as feed for food-producing animal. The scope of this new work should be clear in order to recommend appropriate practices for managing the risk of mycotoxins associated with this commodity. Also, there might be some differences in processing of cassava used as food and feed.