E

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

CL 2017/26-CF
March 2017

TO	Codex Contact Points Contact Points of international organizations having observer status with Codex
FROM	Secretariat, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme
SUBJECT	**REQUEST FOR COMMENTS AT STEP 3 ON THE PROPOSED DRAFT MAXIMUM LEVEL FOR TOTAL AFLATOXINS IN READY-TO-EAT PEANUTS**
DEADLINE	**25 March 2017**
COMMENTS	Codex Contact Point The Netherlands Email: info@codexalimentarius.nl
Copy to:	Codex Secretariat Joint FAO/WHO Food Standards Programme Codex Alimentarius Commission E-mail: codex@fao.org

BACKGROUND

1. At the 7th Session of the Committee on Contaminants in Foods (CCCF07) (April 2013), India presented a proposal for new work on the establishment of maximum levels (MLs) for total aflatoxins (AFs) in ready-to-eat (RTE) peanuts and methods of sampling. Many delegations supported the proposal and indicated that they would provide data to support the work. Some other delegations, while not opposed to the establishment of MLs in principle, proposed that a discussion paper be developed to provide an overview of the concern with RTE peanuts and to assemble data on consumption and aflatoxin levels in RTE peanuts in international trade, to allow the Committee to make a more informed decision on new work. Such data would be useful for JECFA should they conduct a risk assessment. Further proposals were made to consider Aflatoxin B_1 (AFB_1) rather than total aflatoxins as this aflatoxin was considered the most widespread and toxic compound among aflatoxins. The Committee agreed to establish an electronic working group (EWG) lead by India, to prepare a discussion paper for consideration at CCCF08 that defines the issue, identifies the available data and specifies data requirements for establishing MLs of AFs in RTE peanuts.[1]

2. CCCF08 (April 2014) considered the discussion paper prepared by the EWG led by India agreed to initiate new work on establishing MLs for total AFs (AFT) in RTE peanuts. The Committee agreed to establish a EWG led by India to prepare a proposal for MLs for AFT in RTE peanuts, for comments and consideration at CCCF09.[2] The 37th Session of the Codex Alimentarius Commission (CAC37) (July 2014) approved new work on establishing MLs for Total AFs in RTE peanuts[3].

3. At CCCF09 (April 2015), India, as Chair of the EWG, summarized the discussion and recommendations[4] of the EWG as follows: Codex members and observer who participated in the EWG submitted data on MLs of total AFs in RTE peanuts. Hence MLs for total AFs at 10 µg/kg in RTE peanuts in line with tree nuts may be recommended for consideration by CCCF09. Existing Codex methods of sampling as given in the General Standard for Contaminants and Toxins in Food and Feed (GSCTFF) (CODEX STAN 193-1995), Schedule-I, Annex-I currently being practiced may continue for the time being even for RTE peanuts, however, there will be a need to review the method of sampling of RTE peanuts traded in all packs. With regards to identification of requirements for expert scientific advice and risk assessment by JECFA; CCCF should consider requesting JECFA to perform an exposure assessment for health impact based on proposed MLs for total AFs in RTE peanuts. Therefore, the EWG recommended an ML of 10 µg/kg of total AFs in RTE peanuts in line with tree nuts for consideration by CCCF.

---

[1] REP13/CF, paras. 149 - 151
[2] REP14/CF, paras. 115-120, Appendix X
[3] REP14/CAC, Appendix VI
[4] CX/CF 15/09/09, paras. 4-6, Appendix I (paras.16 and 19)

4. The Committee agreed to request JECFA to conduct an exposure assessment for health impact and calculate violation rates based on the hypothetical MLs of 4, 8, 10 and 15 µg/kg for total AFx in RTE peanuts. The Committee further agreed that work on the ML for totals AFs in RTE peanuts would be undertaken when the results of the JECFA impact assessment became available.[5]

5. CCCF10 (April 2016) recalled that the MLs for total AFs in RTE had been held pending the outcome of the JECFA exposure assessment for health impact. Noting that this would be addressed at the JECFA83 meeting, the Committee agreed that India would prepare proposals for MLs taking into account the outcomes of the JECFA83 meeting for consideration by CCCF11.

6. The Committee endorsed the priority list of contaminants and naturally occurring toxicants for the JECFA evaluation and agreed to consider at its next session proposed draft MLs for total AFs in RTE peanuts following the JECFA83 evaluation.[6]

SAMPLING PLANS

7. Currently, General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) and Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CAC/RCP 55-2004) are available. Aflatoxins in peanuts are heterogeneously distributed, which makes representative sampling extremely difficult. Therefore, considerable care and planning are needed in sampling to ensure the accuracy of the estimated levels of aflatoxins. Currently non-destructive methods are not available for measuring aflatoxin contents in peanuts. A typical analytical method for the determination of aflatoxins in peanut kernels includes sampling, milling and homogenization. Therefore, for a precise determination of representative (average) value of aflatoxin load in an individual consignment/lot, the entire consignment/lot needs to be ground for analysis which is impractical. The existing Codex methods of sampling currently being practiced is comprehensive hence may continue for RTE peanuts. Method of sampling could be reviewed for RTE peanuts traded in all packs, if required, in due course.[7]

JECFA83 EVALUATION

8. On request of CCCF, JECFA performed an impact assessment of different MLs for RTE peanuts and concluded that enforcing a maximum limit (ML) of 10, 8 or 4 µg/kg for ready-to-eat peanuts would have little further impact on dietary exposure to AFT for the general population, compared with setting an ML of 15 µg/kg. At an ML of 4 µg/kg, the proportion of the world market of ready-to-eat peanuts rejected would be approximately double the proportion rejected at an ML of 15 µg/kg (about 20% versus 10%).

RECOMMENDATIONS

9. Based on the JECFA83 evaluation, it is proposed that an ML of 15 µg/kg of AFT in RTE peanuts be considered by the Committee.

[5] REP15/CF, paras. 92-100
[6] REP16/CF, paras. 170, 171, 173, Appendix VI
[7] CX/CF 15/09/09, Appendix I (para. 16)