codex alimentarius commission





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Agenda Item 7

CX/CF 10/4/7 Add.2 March 2010

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

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

PROPOSED DRAFT REVISION OF THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF AFLATOXIN IN TREE NUTS (ADDITIONAL MEASURES FOR BRAZIL NUTS) (N12-2009)

Comments submitted by Japan and Thailand

JAPAN

Japan appreciates the efforts of Brazil to prepare the Proposed draft Revision of the Code of Practice for consideration at the forthcoming 4th Session of the Codex Committee on Contaminants in Foods (CCCF).

Japan, generally supporting the proposed draft revision of the Code of Practice, would like to seek clarification on the expression "a safe moisture level" in Paragraph 8 of Annex I. As humidity is one of the critical environmental factors for fungal growth, especially in the rain forest environment, a required target level of the product moisture should be specified to facilitate management conforming to the Code. Such level should be corresponding to an appropriate level of water activity, which is probably below 0.70, in accordance with the note of justification for Paragraph 8 of Annex II.

From this perspective, Japan would appreciate if clarification on the relevance of "a water activity below 0.70" referred in Paragraph 11 were made.

THAILAND

Thailand would like to express our appreciation to the electronic working group led by Brazil for the success in revision of the Appendix on Additional Measures for the Prevention and Reduction of Aflatoxin in Brazil nuts. Our comments on the document are as followings:

- paragraph 8

It should be identified clearly what is the safe moisture level mentioned in this paragraph. In fact, the level of available water is the most important factor for aflatoxin producing fungi. We are of the view that this paragraph should provide clear figures on both safe moisture and water activity (A_w) to ensure that it is in the range that aflatoxin producing fungi can not grow or not produce the toxin. In addition, we would like to seek for clarification whether the recommended period of 10 days is based on any scientific data.

- paragraph 9

For consumer protection, the recommended storage practice should be followed by processor level as well as community level. So, the last sentence "This recommendation applies specially to the processor level, considering that is very difficult to achieve it at community level" should be deleted or amended to be interpreted that both level have to implement this recommendation but with some flexibility.

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- paragraph 11

As mentioned in paragraph 8, the water activity $(A_{\mbox{\tiny w}})$ should be accompanied with moisture content to facilitate practice.