CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 5, 8, 10

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

17th Session
15-19 April 2024

Comments submitted by Türkiye

Agenda Item 5: Maximum levels for lead in certain food categories (at Step 4)

Türkiye welcomes and appreciates the work on the maximum levels (MLs) for lead by the electronic Working Group chaired by Brazil.

Türkiye's comments are:

Commodity/ Product Name	Maximum Level (ML) mg/kg	Comment/Position
Spices, dried bark[a]	2,5	Türkiye supports the proposed ML of 2,5 mg/kg.
Spices, dried flowers[b]	0,4	Türkiye supports the proposed ML of 0,4 mg/kg.
Spices, dried floral parts[c]	~~2,5~~ 1,0	Türkiye would like to comment in favour of a lower ML of 1,0 mg/kg for all dried floral part spices. When APPENDIX III Table A is examined, it is seen that the P95 values of caper and saffron are in accordance with our recommendation. While the mean value for Clove is 0,45 mg/kg, the P95 value is 2,32 mg/kg. The large difference between the mean and P95 values indicates that the number of data to the right of the mean contains fewer and significant differences.
Spices, dried fruits and berries[d]	0,6	Türkiye supports the proposed ML of 0,6 mg/kg. However, for Sichuan peper, a different maximum limit has determined from the dried fruit and berries category, taking into account P95 (Appendix III, Table A). P95 levels for star anise, sumac and dried paprika in this category are 3,23; 0,80 and 0,73 respectively. Therefore, the exception made for Sichuan peper in the Notes/Remarks column can be made for star anise, sumac and dried paprika. "*The ML does not apply to sichuan pepper, star anise, sumac and dried paprika*"
Sichuan pepper and star anise	3,0	Türkiye supports the proposed ML of 3,0 mg/kg for sichuan pepper and star anise
Sumac and dried paprika	0,8	Türkiye would like to comment in favour of a ML of 0,8 mg/kg for sumac and dried paprika.
Spices, dried rhizomes, bulbs and roots[e]	2,0	Türkiye supports the proposed ML of 2,0 mg/kg.
Spices, dried seeds[f]	0,8	Türkiye would like to comment in favour of a lower ML of 0,9 mg/kg. The P95 level (Appendix III, Table A) is 1,47 and mean is 0,74 for Celery seeds.
Spices, dried aril[g]	0,9	Türkiye supports the proposed ML of 0,9 mg/kg.
a: Cinnamon, canella, cassia. b: Chamomile flower. c: Saffron, Cloves, Capers. d: ~~Star Anise~~, Cardamom, Cayenne, Black pepper, Green pepper, White pepper,		Türkiye recommends removing star anise, sumac and dried paprika from footnote d.

Pink pepper, Red pepper, ~~Paprika~~, Peppers chilli, Pimento, Tamarind, ~~Sumac~~, Vanilla. e: Ginger, Turmeric. f: Anise seed, Coriander seed, Cumin seed, Dill seed, Fenugreek seed, Fennel seeds, Mustard, Nutmeg. g: Mace	

Commodity/ Product Name	Maximum Level (ML) mg/kg	Comment/Position
~~Fresh culinary herbs~~	~~0,2~~	Türkiye would like to comment in favour of a ML of 2,5 mg/kg for fresh and dried culinary herbs (on dry matter). Türkiye recommend that the maximum level be determined in dry matter and that the maximum level be set as 2,5 mg/kg in a single line for fresh and dried culinary herbs. European Spice Association (ESA) recommeds dehydration factors beetween 3 and 13 for some culinary herbs. Considering these factors, a significant relationship is expected between fresh and dried culinary herbs. However, when Appendix III Table B is examined, we think that this significant relationship cannot be achieved due to insufficient data, especially for fresh products. For example, while the P95 for fresh bay leaves is 0,15 mg/kg, for dried it is 7,01 mg/kg. At the same time, results above 0,2 are encountered for fresh oregano, thyme, turmeric and ginger. In our country, the maximum limit for fresh turmeric and ginger is 0,8 mg/kg. For this reason, we recommend determining the maximum limit for fresh and dried culinary herbs in a single line on a dry matter basis.
Fresh and dried culinary herbs (on dry matter)	2,5	

Agenda Item 8: Sampling plans for total aflatoxins and ochratoxin A in certain spices (at Step 4)

Türkiye welcomes and appreciates the work done by India as chair of the Electronic Working Group to prepare the discussion paper CX/CF 24/17/08 on sampling plans for total aflatoxins and ochratoxin A in certain spices.

Türkiye's comments;

Türkiye is largely supportive of the sampling plan as presented in Appendix I but has following comments:

A) Spices with large particle size

- We recommend an incremental sample weight of 200 g to comply with Table 1.

  "*(*) The number of incremental samples of ~~100~~ 200 g to be taken depends on the weight of the lot, with a minimum of 10 and a maximum of 100*."

- In the aggregate sample column in Table 2; It is thought that the values to be obtained by multiplying the number of incremental samples and the weight of the incremental sample (200 g) should be included.

- Decision rules: Heterogeneous distribution increases especially in foods with large particle sizes. At the same time, in some foods, mycotoxins can develop on the surface, while in others, they can develop inside the food. In studies conducted on some foods with large particle sizes in our country, the rate of mycotoxin detected particles in the total was found to be 0,7%. The amount of mycotoxin in the detected particles was found to be quite different from each other. According to these findings, homogeneity will not be achieved by mixing the aggregate sample. In particular, laboratory samples prepared from lot containing mycotoxins at levels close to maximum limits may be found suitable in one laboratory and inappropriate in another laboratory, depending on chance. According to our country's official control data, this situation is at a level that cannot be ignored.

For these reasons, we present the following suggestion for your consideration.

"*Decision rule: If the aflatoxin test result of average of two laboratory samples in lots divided into two laboratory samples, or laboratory sample result in lots represented by a single laboratory sample is less than or equal to the ML, then accept the lot. Otherwise reject the lot.*"

B) Spices with small particle size

- it should be specified that the incremental sample size is 100 g.

Agenda Item 10: Discussion paper on pyrrolizidine alkaloids in food and feed

Türkiye welcomes and appreciates the work done by The European Union as chair of the Electronic Working Group to prepare the discussion paper CX/CF 24/17/10 on pyrrolizidine alkaloids in food and feed.

Türkiye supports the new work on updating the Codex Alimentarius Code of practice for weed control to prevent and reduce pyrrolizidine alkaloid contamination in food and feed (CXC 74-2014) and to complement the Code of Practice, if appropriate, with specific Annexes for tea, herbs, herbal infusions, food supplements and spices and agrees to forward the project document as outlined in Appendix II to CCEXEC and the CAC for approval as new work.

Türkiye supports the work on updating CXC 74-2014. However, due to the nature of beekeeping activity, it is considered that the terminology of "weed control" for honey will not be correct and it is considered that it would be appropriate to prepare a separate Code of Practice for honey. In our studies, it is understood that PAs risk is higher in honeys that have high pollen content and consist of many different types of pollen. In honey standards and our national honey legislation, it is stated that pollen is a part of honey and cannot be removed from honey except filtered honey. For this reason, it is considered that the study to be carried out for honey should be handled separately from the study to be carried out for other foods, which will accelerate the study.

Türkiye are in favour of preparing a document prepared by the EWG providing a guidance on sampling and analysis of the presence of pyrrolizidine alkaloids in feed and food for consideration by CCCF18 in view of issuing a future call for data on the presence of pyrrolizidine alkaloids in food and feed.