CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Eleventh Session
Rio de Janeiro, Brazil, 3 – 7 April 2017

To be held at the Windsor Marapendi Hotel, Rio de Janeiro, Brazil

Comments by India on agenda item 2, 3, 5, 6, 7 and 12

Agenda item- 2 CX/CF17/11/2-add.1

MATTERS REFERRED TO THE COMMITTEE BY THE CODEX ALIMENTARIUS COMMISSION AND ITS SUBSIDIARY BODIES MATTERS ARISING FROM THE COMMITTEE ON FATS AND OILS

Specific Comment: MLs of lead and arsenic specified in edible fats and oil in GSCTFF may also be followed for fish oil at present. This may be reviewed later based on the occurrence data that becomes available from various member countries.

Agenda item- 3 CX/CF17/11/3- Add.2

MATTERS OF INTEREST ARISING FROM FAO AND WHO (INCLUDING JECFA)
UPDATE ON RELEVANT WORK TO BE CONSIDERED FOR CIGUATOXINS

General Comments:

1. India supports the establishment of maximum limits for C-CTX-1 and P-CTX-1 and development of Risk Management Guideline. India proposes that an ML for I-CTX (Indian Ocean Ciguatoxin) may also be established.
2. Committee may consider collection of data on the same.
3. India also supports to seek scientific advice from FAO/WHO for carrying out risk assessment of CTX and review of existing analytical methods for ciguatoxin detection and quantification.

Rationale: India recognises ciguatoxin contamination as potential food safety threat. It is to be noted that C-CTX and P-CTX refers to Caribbean and Pacific ciguatoxin respectively. As CFP (Ciguatera Fish Poisoning) events have also occurred in Indian Ocean, work related to ciguatoxin should also include characterization and fixation of ML for Indian Ocean Ciguatoxin (I-CTX). India has faced some rejections from European Union due to presence of ciguatoxin in Barracuda and Caranx.

Agenda item- 5 CL 2017/23-CF

PROPOSED DRAFT REVISION OF MAXIMUM LEVELS OF LEAD IN SELECTED FRUITS AND VEGETABLES (FRESH AND PROCESSED) IN THE GENERAL STANDARD FOR CONTAMINANTS AND TOXINS IN FOOD AND FEED (CODEX STAN 193-1995)

Specific Comments:

1. **Jams (fruit preserves) and jellies**

India reaffirms its position to lower the ML for lead in jams, jellies and marmalades from the current 1mg/kg to 0.5 mg/kg.

Rationale: This is based on the new data that was made available by India recently and the proposed level of 0.5 mg/kg would ensure compliance of at least 97% of the samples that were considered in the dataset for the purpose of this review of ML.

2. Mango Chutney:

1. India supports to maintain mango chutney as a standalone category only and not to combine it with jams, jellies and marmalades for the following reasons:

1.1. The mango chutney differs from jam, jellies and marmalades based on its ingredients, texture and use. The basic ingredients required for mango chutney are sweeteners, honey, mango fruit (not less than 40 % in the finished product), other fruits and vegetables, salt , spices and condiments (such as vinegar, onion, garlic and ginger) and other suitable food ingredients, while Jams, jellies and marmalades have fruits, sugar, acid and pectin.

1.2. It also differs in total soluble solids content. In mango chutney, it is not less than 50% m/m while in jams, jellies and marmalades it is 60%-65% or greater.

1.3. No coloring agent, flavouring agent and antifoaming agents are used in mango chutney while in jams, jellies and marmalades they are used.

Based on the above points, it is clear that the ingredients and the composition of mango chutney are different from the jams, jellies and marmalades which may have lead occurring at levels different from the jams, jellies and marmalades. Therefore, it is not justifiable to combine these categories.

2. India does not support the establishment of an ML of 0.1mg/kg as it is proposed on the basis of 34 samples only which cannot be considered as representative data to establish an international ML.

3. Since mango chutney is composed of various ingredients like sweetener, salts, spices and condiments in which higher MLs for lead have been specified (eg. 2mg/kg of lead is permitted in salt), India proposes to retain the current ML of 1mg/kg for lead in mango chutneys.

Agenda item- 6 CL 2017/24-CF

Proposed draft maximum levels for cadmium in chocolate and cocoa-derived products

General Comments:

India appreciates the work done by the EWG and support the proposed MLs specified for cadmium in chocolate and cocoa-derived products.

Agenda item- 7 CL 2017/25-CF

THE PROPOSED DRAFT CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF ARSENIC CONTAMINATION IN RICE

Section 3 Definition

Para 3.6 Inorganic arsenic

Comment: India supports the retention of the text mentioned in the square bracket

Para 3.8 Aerobic condition

Comment: The sentence may be modified as:

Aerobic condition of soil in a paddy field is a condition where the soil in the paddy field is non-flooded, non-puddled, non-saturated and well drained.

Para 3.10 Production under irrigation

Comment: Sentence may be deleted as it is not mentioned anywhere in the document.

Section 4 MEASURES TO PREVENT AND REDUCE ARSENIC CONTAMINATION

Para 4.1

Comment: Sentence may be retained

Para 4.3.2 Soil

Comment: The word 'inorganic' in the sentence may be retained

Para 4.4.5 may be modified as under:

Comment: National or relevant food control authorities may identify rice cultivars **with low arsenic uptake** and encourage public research institute and/or private nursery developer to develop **such** rice cultivars. Producers could select such rice cultivars, if available and suitable.

Rationale: For better clarity because the current text gives meaning of identification of rice cultivars that can absorb arsenic even if it is present at low concentration in soil or water rather than feature of poor uptake of rice cultivar for arsenic.

Section 5 Monitoring

Para 5.1

Comments - Sentence may be as :The effectiveness of measures should be monitored to assess arsenic concentration in rice.

Para 5.2

Comment- The word Historical may be deleted**.**

Section 6 RISK COMMUNICATION

Para 6.1

Comment-

Sentence [noting that there are health benefits associated with consumption of husked rice] may be deleted.

However sentence [considering concerns regarding arsenic concentrations and the nutritional benefits of rice consumption] may be retained.

Para 6.2

Comment- The first option in the bracket may be deleted. Remaining sentence in the second option may be modified as above.

Polished rice contains less inorganic arsenic than husked rice, because polishing removes inorganic arsenic in the bran layer. Thus, husked rice containing high concentration of arsenic may be appropriately processed into polished rice and thereafter, distributed and safely consumed.

Agenda item- 12 CX/CF 17/11/12

DISCUSSION PAPER ON MAXIMUM LEVELS FOR METHYLMERCURY IN FISH (Comments by India)

Specific Comments:

1. India supports analysis of total mercury for screening purposes and stetting MLs based on total mercury.
2. India is of the view that there should be an uniform ML for total mercury/ methylmercury for all tuna species, considering the voluminous international trade of tuna. Therefore India supports 1.2mg/kg of methyl mercury in all tuna species.
3. India also supports the establishment of an ML of 2 mg/kg of methyl mercury in swordfish.

Rationale: Analysis of total mercury is more cost effective than analysis of methyl mercury. And, uniform ML for all tuna species will avoid confusion and ambiguity in species authentication of processed products.