

## CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

5<sup>th</sup> Session

The Hague, The Netherlands, 21 – 25 March 2011

PROPOSED DRAFT MAXIMUM LEVELS FOR TOTAL AFLATOXINS IN DRIED FIGS  
(N11-2010)

*Comments at Step 3 submitted by Brazil, Costa Rica and Norway*

**BRAZIL**

Brazil supports the Maximum Level for Total Aflatoxins in ready-to-eat dried figs as proposed.

**COSTA RICA**

Costa Rica recognizes the opportunity to submit her comments on the document on the total ML of aflatoxins in dry figs.

In Costa Rica, processing of figs is artisanal and they are produced mainly in sugar and not dry. However, Costa Rica supports the proposal in the document to establish a maximum level of 10 µg/kg.

**Rationale:** In Costa Rica we don't have data on the occurrence of aflatoxins in this particular food. However, in the CCCF levels for the presence of aflatoxins in nuts ready to eat have been set with this same ML on the basis of data submitted by some countries and JECFA assessments, thus this level seems consistent for intake in a food that does not need further processing.

**NORWAY**

Norway wishes to thank Turkey and the members of the electronic working group for their extensive work on the document "Proposed draft maximum levels for total aflatoxins in dried figs". We also appreciate the opportunity to comment on this issue. Dried figs are imported to our country continuously throughout the year, with the highest amounts imported during the last three months of the year (in relation to Christmas).

We would like to draw the attention to the *Code of practice for the prevention and reduction of aflatoxin contamination in dried figs (CAC/RCP 65-2008)*. We believe that an assessment of the compliance and efficiency of this Code of practice should be further discussed before advancing the proposed maximum levels, to see whether all major steps of dried fig production already are in full compliance with the Code of practices. Priority should be given to an overall reduction of aflatoxins in dried figs.

In our national legislation, the existing maximum level for AFB1 in dried fruits direct for human consumption is 2 µg /kg and the maximum level for total aflatoxins is 4 µg /kg. Separate levels apply to dried fruit subjected to sorting or other physical treatment before consumption. These maximum levels are similar to the EU legislation. If one take into account the occurrence data, we question the need for having a maximum level as high as 10 µg /kg for total aflatoxins, see Table 1:

Table 1. Amount of dried figs within the existing and suggested maximum levels (in % of the total amount analysed)

	% with total aflatoxin $\leq 4 \mu\text{g/kg}$	% with total aflatoxin $\leq 10 \mu\text{g/kg}$	% with aflatoxin B1 $\leq 2 \mu\text{g/kg}$
EU data (2000-2006) <sup>1)</sup> (n=2067)	92.9	95.6	92.2
Turkish data – 2009 <sup>2)</sup> (n=6837)	93.75	97.16	92.63
Turkish data – 2010 <sup>2)</sup> (n=1512)	97.45	98.84	96.14

1) The EFSA Journal (2007) 446, pp 1-127

2) Turkish data, Table 8 in CX/CF 11/5/7

EU data from 2000-2006 show a compliance rate of 92% for the existing AFB1 maximum level, and 93% for the maximum level for total aflatoxins. Recent Turkish data suggest an even higher compliance rate ranging from 94-97% for the existing maximum level of 4  $\mu\text{g/kg}$  for total aflatoxins, and 93-96% for the existing maximum level for aflatoxin B1 of 2  $\mu\text{g/kg}$ . (Table 1).

Aflatoxins are genotoxic and carcinogenic and exposure to aflatoxins should therefore be as low as reasonable achievable. We are concerned that a major increase in maximum levels for total aflatoxins as proposed leads to an increased number of samples with higher levels of the toxins on the market. Given the high compliance rate for the maximum levels already in place in Norway and the EU, we will be very reluctant to increase the maximum levels as suggested in CX/CF 11/5/7, “proposed draft maximum levels for aflatoxins in dried figs”.