



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Seventh Session

Moscow, Russian Federation, 8 – 12 April 2013

**PROPOSED DRAFT CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION
OF OCHRATOXIN A CONTAMINATION IN COCOA**

*Comments at Step 3 submitted by Brazil, Costa Rica, European Union, Ghana, India, Philipines, Russian Federation
and African Union*

BRAZIL

Brazil thanks Ghana for the excellent work and support advance of the COP to be adopted by the Commission.

COSTA RICA

Costa Rica welcomes the opportunity to provide comments on document CX/CF13/7/9 Proposed Draft Code of Practice for the Prevention and Reduction of Ochratoxin A Contamination in Cocoa.

Comment:

Costa Rica is a small cocoa producer and understands that this is an issue of great importance for the protection of public health, especially because of the fact that many cocoa-derived products have children and teenagers as target population. Therefore we support the development of the code of practice. We do not have comments on the document.

EUROPEAN UNION

The European Union and its Member States (EUMS) welcome and appreciate the good work performed by the electronic Working Group under the lead of Ghana on the elaboration of a draft Code of Practice for the prevention and reduction of ochratoxin A contamination in cocoa.

The EUMS have no comments and would agree to forward the proposed draft Code of Practice for the prevention and reduction of ochratoxin A contamination in cocoa to the 36th Session of the Codex Alimentarius Commission for adoption at Step 5/8 (with omission of Steps 6 and 7), if this would be found appropriate.

GHANA

Ghana with support from other member countries led the development of this Code of Practice. The following omissions have been identified and we wish to submit accordingly.

Comment 1: Figure 1b – Longitudinal section of a cocoa seed

Change the label 'Rootlet' to 'Radicle'.

Rationale: 'Rootlet' connotes a germinating part, which is normally not expected in a cocoa seed

Comment 2: Figure 2 – Cocoa value chain

- Change 'Figure 2.2' to 'Figure 2.0'
- We have noticed that the word 'processors' is missing from the penultimate process/activity and suggest that it is written next to the word 'Cocoa'. The phrase 'Resale to Cocoa' should therefore read 'Resale to Cocoa **Processors**'.
- For the last process/activity; a space should be put in between the symbol '&' and the word 'processing'.

INDIA**Section 4.5: Drying Process**

Paragraph 32: The text may be modified as follows:

The drying process could be done by direct sunlight or artificial drying or a combination of both. A moisture content of ~~6-8%~~ **lessthan8%** in cocoa beans is considered optimal in order to avoid growth of microorganisms and for good storage.

Rationale: *The recommended code of practice shouldn't be very prescriptive in its approach. Hence, specifying a very narrow range of moisture content may turn it into an impractical document at field level, especially in developing countries.*

Paragraph 35: The layer of drying cocoa beans should not exceed 6 cm thick, which corresponds to 40kg of wet cocoa beans per square meter of drying area to avoid slow or inadequate drying that may lead to mould growth.

The above text may be changed as follows:-

“Thickness of layers of cocoa beans should be such that it avoids slow or inadequate drying, which may lead to mould growth. Cocoa bean layers having thickness of less than 6cm (approximately corresponding to 40kg of wet cocoa beans per square meter of drying area) are generally recommended.”

Rationale: *The modified text provides a principle and an example to apply the principle. This makes the recommended code of practice less prescriptive in its approach and broad based.*

Section 4.6: STORAGE, TRANSPORTATION AND TRADING OF DRIED COCOA BEANS

Paragraph 44: The text should be modified as under:

The dried cocoa beans that will be stored must be properly identified by lots, at the farm level or in out-of-farm warehouses, in bulk or in clean bags under appropriate storage conditions as prescribed in paragraph 43. **Bags used in storage and transport of cocoa beans need to be free of noxious substances such as mineral oils**

Rationale: *This will bring in more clarity regarding the conditions of storage of cocoa beans.*

Paragraph 47: The text should be modified as under:

During the entire process, the cocoa beans must also be protected from re-wetting, degradation and cross-contamination. In long term storage conditions, humidity should be ~~kept below 70%RH kept under strict control (less than 70%RH)~~ **kept below 70%RH**. Appropriate storage facilities should follow the use of good storage practice and conduct regular monitoring in order to prevent or reduce mould growth.

Rationale: *Use of words “strict control” may give an impression that very sophisticated automated systems are expected to be put in place. This would be impractical, especially in farm level operations in developing countries.*

RUSSIAN FEDERATION**Position:**

We agree with the approach proposed in the document CX / CF 13/7/9 for the prevention and reduction of ochratoxin A contamination of cocoa.

PHILIPPINES

The Philippines congratulates the Electronic Working Group led by Ghana on the latest proposed draft code. The Philippines, as a member of the Electronic Working Group, provided its comments during the initial drafting of the code based on our national Code of Practice for Philippine Cacao Beans. We therefore propose that this current draft be forwarded to Step 5.

AFRICAN UNION

<p>African Union strongly supports the adoption of the proposed code of practice for the prevention and reduction of ochratoxin A in cocoa by Codex Alimentarius Commission.</p>	<p>The proposed COP is attainable in both developing and developed countries and the recommended practices have been demonstrated as effective intervention strategies for prevention and control of ochratoxin A in cocoa (Amezqueta <i>et al.</i> 2009)*. Additionally, this will be the first global document prepared for the mitigation against the nephrocarcinogenic toxins in cocoa.</p> <p>*Amezqueta, S., Gonzalez-Penas, E., Murillo-Arbizu, M. and Lopez de Cerain, A (2009). Ochratoxin A decontamination: A review. <i>Food Control</i> 20: 327-331</p>
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