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FOOD AND AGRICULTURE
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Agenda Item 13 (a)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

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PROPOSED DRAFT APPENDIX TO THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF AFLATOXINS CONTAMINATION IN TREE NUTS

Comments at Step 3 by European Community and Kenya

EUROPEAN COMMUNITY

The European Community and its Member States (ECMS) support the development of additional measures for the Prevention and Reduction of Aflatoxin Contamination in Brazil nuts.

Given the toxicity of aflatoxins, their presence in Brazil nuts should be avoided as much as possible in order to protect public health. Significant levels of aflatoxins in Brazil nuts have been observed in the European Union. Consignments of Brazil nuts, which are not complying with the EU legislation on aflatoxins, are rejected or destroyed, involving economic losses.

It is therefore of major importance for the protection of public health but also to avoid economic losses, that these measures for the prevention and reduction of aflatoxin contamination in Brazil nuts are effectively applied to avoid as much as possible the presence of aflatoxins.

As regards the Code of practice the ECMS wish to make the following comment as regards § 6. It is important for the prevention of contamination that nuts are not damaged. Therefore it is appropriate to add in § 6 that pods have to be opened in such a way that damage to the nuts is avoided as much as possible. In addition a number of editorial comments are proposed. In the attached Code of Practice, the proposed modifications are highlighted.

INTRODUCTION

1. The formulation and acceptance of an appendix to the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Tree Nuts will provide uniform guidelines for producing countries ~~to consider~~ in attempting to control and manage contamination ~~by aflatoxins~~ of Brazil Nuts ~~by aflatoxins~~. In order for these measures to be effective, it will be necessary for collectors, processors and other members of the production ~~on~~ chain to consider the general principles established by the Code, while taking into account the ~~extractivistic practices associated with~~ fact that the Brazil nuts tree (*Bertholletia excelsa*) ~~is not cultivated~~. This species exists all over the Amazon Region, however the largest concentrations ~~s of trees~~ are in ~~the~~ Brazilian Amazon.

2. This appendix applies only to Brazil nuts, given the very specific conditions related to their collection and processing.

RECOMMENDED PRACTICES BASED ON GOOD EXTRACTIVISTIC PRACTICES (GEP)

PRE-COLLECTING

3. Before the start~~ing~~ of the crop season extractivists should clear the area under the Brazil nut trees, removing residual pods and nuts from the former crop. Pods left from the last crop season must never be mixed with pods from the present crop season, as they represent a potential focus of contamination with *Aspergillus*.

COLLECTION

4. Collection of Brazil nuts should begin as soon as most of the pods have fallen from the trees to minimize problems involving *Aspergillus* contamination. A certain delay in the collection is expected because during the crop season remaining pods may fall ~~from up to 60m height trees~~, posing a risk to the lives of the collectors.

POST-COLLECTION

5. The pods should be sorted to remove broken and damaged ones, and gathered in piles or preferentially in thin layers, for ~~the~~ only a short period of time.

6. Pods should be opened as soon as possible after collection, with the nuts being removed from the pods and placed ~~in~~ on clean flooring or plastic canvas in good condition, ~~to~~ avoid~~ing~~ contact with the soil. During the opening of the pods, care should be taken to avoid damage to the nuts as much as possible. The nuts should be sorted to remove damaged, rotten, empty, and rancid ones.

7. ~~First~~The transportation of the nuts, from the forest to a storage facility, should occur as soon as possible, using containers that are clean, dry and protected against rain and insects, to the greatest extent possible.

8. At the location of the primary storage, nuts must be dried to a safe moisture content to prevent mould growth and possible aflatoxin contamination during storage. ~~submitted to a reduction of their original/primary humidity.~~ For this purpose nuts should be spread out in thin layers, in open air, on clean surfaces, above ground level, and ~~exposed to~~ sun dried~~ing~~ and/or a natural air circulation, with ~~a~~ regular turning~~revolving~~. The nuts should be protected against rain and animals~~pests~~, such as birds, rodents and insects.

9. After ~~primary~~ drying, the nuts should be placed in a storage facility that has floors that are at least 50 cm above ground level; protected against rain and ~~pests~~animals and allows good air circulation. For the purpose of identification and traceability nuts, in bulk or in bags, from different origins and/or days of collection, ~~in bulk or in bags~~, should be handled separately and kept separated until the final processing and packaging.

10. During the~~Second~~ transportation ~~(ground or water)~~ of the nuts from the primary storage facility, ~~should be~~ in bulk or in bags, either to an intermediary location or to a processing facility, the nuts should be ~~done~~ separated from other goods, in containers that are clean, dry, protected against humidity and free ~~from~~ insects and visible fungal growth. Conveyances for transporting nuts should be made of material that will permit thorough cleaning and maintenance so as not to constitute a potential source of contamination for the Brazil nuts.

11. If the nuts are stored at an intermediat~~ery~~ary location, before reaching the processing facility, the ~~warehouses~~ storage facility should have the following ~~characteristics~~:

(a) ~~protected~~ from rain and animals;

(b) ~~a~~ washable and impermeable floor;

(c) ~~allow~~ drainage ~~for~~ ground water;

(d) ~~good~~ air circulation;

~~1.~~ (e) ~~sufficient~~enough area and proper divisions to keep lots separated.

~~keep lots separated.~~

GENERAL RECOMMENDATIONS

12. National, State and local governments, as well as Non Governmental Organizations –NGOs and trade associations ~~or~~ and cooperatives should provide basic education and update information on the hazards associated with aflatoxin contamination to the extractivists and other agents involved in the Brazil nuts production ~~one~~ chain.

13. Personnel involved in collecting pods should be regularly trained in personal hygienic and sanitary practices that must be implemented in the pre-collection ~~ing~~, collection ~~ing~~, post-collection ~~ing~~ and in processing facilities throughout the crop season.

KENYA

1.0 General comments

1.2 Kenya proposes that the format of presentation be revised such that the main clauses are given the numerical values while the current numbered paragraphs assumes the sub clauses to the respective main clause for ease of reference.

1.2 It is proposed that the word ‘extractivists’, which is believed to refer to the collections of the fallen nuts, be replaced with ‘collectors’, which is a better term than the prior.

2.0 Specific comments

2.1 Introduction

An additional paragraph was proposed to read as, “*The collectors should wear protective gear such as gloves, head gear and boots to reduce the risk of injury from the falling nuts.*” This is derived from the fact that during collection of the nuts there is a possibility of more to fall and hence by accident they may fatally hit the collectors

2.2 Collection

Collection of Brazil nuts should begin as soon as most of the pods have fallen from the trees to minimize problems involving *Aspergillus* contamination. ~~A certain delay in the collection is expected because during the crop season remaining pods may fall from up to 60m height trees, posing a risk to the lives of the collectors.~~

It is strongly felt that the striked part will add no value to the document especially if the proposal to have an extra paragraph under the introduction is adopted

2.3 Post-Collection- Kenya proposes the following editorial changes in the respective paragraph where the italicized refers to additions while the strikes are the proposed deletion to improve on the simplicity and ease of understanding the contents of the standard.

2.3.1 The pods should be sorted to remove broken and damaged ones, and gathered in piles or preferentially in thin layers, for ~~the~~ only a short period of time.

2.3.2 Pods should be opened as soon as possible after collection; with the nuts being removed from the pods and placed in clean *dry* floor or *hygienic* plastic canvas in good condition, avoiding contact with the soil. The nuts should be sorted to remove damaged, rotten, empty, and rancid ones.

2.3.3 ~~First~~ *Initial* transportation of the nuts, from the forest to a storage facility, should occur as soon as possible, using containers that are clean, dry and protected against rain and insects, to the greatest extent possible.

2.3.4 At the location of the primary storage, nuts must be *partially dried*. ~~submitted to a reduction of their original/primary humidity.~~ For this purpose nuts should be spread out in thin layers, in open air, on clean surfaces, above ground level, and exposed to sun drying and/or a natural air circulation, with a regular ~~revolving~~ *turning*. The nuts should be protected against rain and animals, such as birds, rodents and insects *and any other contamination.*

2.3.5 After *the* primary drying, the nuts should be placed in a storage facility that has floors that are at least 50 cm above ground level; protected against rain and animals and allow good air circulation. For the purpose of identification and traceability nuts from different origins and/or days of collection, in bulk or in bags, should be handled and kept ~~separated~~ *separately* until the final processing and packaging.

~~2.3.6 Second transportation (ground or water) of the nuts, should be in bulk or in bags, either to an intermediary location or to a processing facility, should be done separated from other goods, in containers that are clean, dry, protected against humidity and free of insects and visible fungal growth. Conveyances for transporting nuts should be made of material that will permit thorough cleaning and maintenance so as not to constitute a source of contamination for the Brazil nuts.~~

This paragraph was rephrased to read as, ” *During subsequent transportation of the nuts, to either a transit storage warehouse or to a processing facility, the nut should be in bulk containers or unitized bags which are clean, dry and without any visible fungal growth. The containers should be water tight, insect and vermin proof and transported separately from other goods.*

2.3.7 If the nuts are stored at ~~an intermediary location~~ *transit warehouse*, before reaching the processing facility. The *transit* warehouses should have the following characteristics: protected from rain, rodents vermin and other animals; washable and impermeable floor; ~~allow~~ *adequate* drainage of ground water; ~~good air circulation~~ *well ventilated*; ~~enough area~~ *sufficient space* and proper divisions to keep lots separated.

2.4 General recommendation

Personnel involved in collecting pods should be regularly trained in personal hygienic and sanitary practices that must be implemented in the pre-collecting, collecting, post-collecting and in processing facilities throughout the ~~crop season~~ *production chain*.