

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16

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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 South Africa

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

CULINARY HERBS AND SPICES

Support the proposed MLs for culinary herbs and spices, except for the following categories:

- spices, dried bark,
- Spices, dried floral parts, and
- Sichuan pepper.

Rationale: JECFA has not established a safe level of lead exposure. Considering the discussions held in CCCF15 regarding the establishment of MLs for Pb in dried spices and culinary herbs, there is a need to reduce Pb dietary exposure. Therefore, there is a need to further reduce the levels of Pb in the aforementioned categories of spices to 2mg/kg or lower to minimise dietary exposure and its impact on consumer health.

Agenda Item 6: Sampling plans for methylmercury in fish (at Step 4)

South Africa supports the proposed sampling plan for methylmercury in fish and the final adoption at Step 5/8.

Rationale: The South African fishing industry is using the EU sampling plan that is used as the basis for the proposed sampling plan for methylmercury in fish. The fact that the compositing of the incremental samples are allowed makes the plan economical and further tweaking of the sampling plan in terms of further stratification of the sampling process and the standardisation of length/weight classes and sorting criteria shall not impact the South African Industry because tight weight classes have been implemented already for shark, tuna and other large pelagic fish.

Agenda Item 7: Definition for ready-to-eat peanuts for the establishment of a maximum level for total aflatoxins in this product

South Africa Supports the definition of RTE peanuts and the recommendations by the EWG.

Rationale: The definition is sufficient and covers a wide variety of peanut products that are consumed in different forms such as raw in-shell peanuts and peanut butter.

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

South Africa supports the recommendations of the EWG.

Rationale: As indicated in the EWG there are technical issues that need further clarity before the advancement of the sampling plan for final adoption.

Agenda Item 9: Code of practice/guidelines for the prevention and reduction of ciguatera poisoning (at Step 4)

South Africa Supports the advancement of CoP.

Rationale: The CoP will help to reduce the risk of ciguatera poisoning from identified fish species.

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

South Africa supports that priority be first given to the development of a Code of Practices (CoP).

Rationale: The recommendations given by the EWG will help to clarify the scope of foods to be covered and to begin work on identifying foods that are at risk for pyrrolizidine alkaloid contamination, such as honey and tea. Additionally, the recommendations will clarify the scope of fully validated methods of analysis before requesting new data that could take several years to compile.

Agenda Item 11: Discussion paper on tropane alkaloids in foods

South Africa supports that priority be first given to revise the Code of Practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed (CXC 74-2014)

Rationale: A CoP which includes all steps of agricultural practices and transformation would be more useful for reducing TAs in food than MLs alone. Proper implementation of control measures will help to prevent contamination and can help in the detection of the source of TAs contamination in the supply chain.

Agenda Item 12: Discussion paper on acrylamide in foods

South Africa supports further work on the discussion paper.

Rationale: The data obtained from members will serve as a valuable tool in identifying and evaluating various risk management options that can be implemented to reduce the levels of AA in specific food categories.

Agenda Item 13: Request for comments on the recommendation for the establishment of maximum levels for cadmium and lead in quinoa

South Africa does not support the establishment of Maximum Limits (MLs) for Lead and Cadmium in quinoa.

Rationale: Based on the analysis performed by the JECFA Secretariat and data collected there is enough evidence to support not enforcing maximum levels for cadmium and lead in cereal grains quinoa because there is little impact on dietary exposure to the general population, compared with the current situation with no Codex ML. Establishing MLs for cadmium and Lead will have an impact on trade with the proportion of rejected quinoa cereal grains being approximately 5% with an ML of 0.1 mg/kg and 0.2% with an ML of 0.2 mg/kg unnecessarily.

Agenda Item 14: Review of the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004)

South Africa supports the revision of the COP.

Rationale: Due to the health risks associated with aflatoxin, the aim of the new work is to further minimize exposure by revising the existing CoP. The discussion paper in Appendix II provides new information that supports the need for this revision.

Agenda Item 15: Review of the Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feedingstuffs for Milk-Producing Animals (CXC 45-1997)

South Africa supports the revision and update of the CoP.

Rationale: New information on Aflatoxin prevention and reduction in animal feed, including feedingstuffs other than cereals, has become available since CXC 45-1997 was elaborated in 1997. Animal-derived milk is also a staple food in many countries therefore an update of the CoP is important.

Agenda Item 16: Development of a Code of practice for the prevention and reduction of cadmium contamination in foods

South Africa support the recommendations by the EWG.

Rationale: There is sufficient information available on cadmium sources and mitigation measures, based on the information provided in Appendices I and III and the development of the annexes to the CoP will assist in clarifying issues such as the different crops and aquatic species that have different propensities to uptake and accumulate cadmium. As a result, some mitigation methods are specific to particular crops, such as cocoa beans.