

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 7, 11, 12, 14, 15

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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 the Russian Federation

The Russian Federation requests to take into account the position presented in this document on some issues of the agenda of the 17th Session of the Codex Committee on Contaminants in Foods:

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

We consider it appropriate to discuss the establishment of different lead MRLs for different categories of spices. In addition, we support the division of herbs into dried and fresh.

We consider it necessary to continue the discussion of the MRLs for lead in spices and culinary herbs, given that the content of lead in food products differs in different countries. Establishing more stringent standards may be an excessive measure.

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

We consider the adoption of the document at step 5/8 to be premature. There is a lack of understanding on some issues, particularly the selective monitoring of mercury in large fish, where fish length and lot size vary widely.

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

WE welcomes the work of India as chair of the Electronic Working Group to prepare the definition for ready-to-eat peanuts for the establishment of a maximum level for total aflatoxins in this product.

We consider it necessary to continue discussions of the definition in the working group.

It is not clear why the definition includes a provision on the labeling "Ready-to-eat peanuts"; we consider this unnecessary. The presence of such a provision in the definition may cause a conflict in the future; if the batch is not labeled "Ready-to-eat Peanuts," then the MRLs will not apply to it. Is that so?

There is also concern about the uncertainty regarding peanut processing processes.

We do not support including peanut butter in the definition of ready-to-eat peanuts.

Agenda Item 11: Discussion paper on tropane alkaloids in foods

We supports the elaboration of a Code of Practice to prevent and reduce the presence of tropane alkaloids in food.

Agenda Item 12: Discussion paper on acrylamide in foods

Taking into account that the current version of the discussion document isn't completed, we consider it possible to continue the work of the electronic working group on its development. Perhaps further discussion should take into account JECFA's expert opinions.

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

We consider it possible to support the start of new work to revise document CXC55-2004 “Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts”. The changes proposed by the e-working group will help prevent or reduce aflatoxins in peanuts.

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)

Taking into account the new information proposed for inclusion by the electronic working group, we consider it possible to revise the document.