

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Tenth Session

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(Comments submitted on by Peru, Thailand and USA)

Proposed draft Code of practice for the prevention and reduction of mycotoxin contamination in spices

PERU

OBSERVACIONES GENERALES:

Es importante diferenciar a las especias de los Capsicum: Al respecto en el documento: La clasificación del Codex de Alimentos y Piensos (FAO-WHO) Roma 1993 define a las siguientes **Especias como Alimentos de la Clase A (Alimentos Primarios de Origen Vegetal), Tipo 05 (hierbas y especias) Grupo N° 028** de canela, brotes de clavo de olor, semilla de cilantro, semilla de eneldo, raíces de helenio, semilla de hinojo, fenogreco, rizomas de jengibre seco rojo o azul, raíz de jengibre, pimienta de guinea, rábano rusticano, bayas de enebro, regaliz, raíz de regaliz, levístico o apio de monte, macis, vaina de capuchina, nuez moscada, pimienta negra, blanca, pimiento largo de rues, pimienta dioica, semilla de amapola (adormidera), semilla de ajonjolí, tamarindo, frijol de tonka, raíz de cúrcuma y vainas de vainilla. **Debe notarse que en dicho grupo no se menciona a los alimentos primarios de origen vegetal del género *Capsicum***, mientras que esto sí se reportan en los **Alimentos de la clase A (alimentos primarios de origen vegetal), Tipo 02 (hortalizas) Grupo N° 012 – Hortalizas de frutos distintos a las cucurbitáceas – Código de letra VO**, enumerándose entre otros: **Paprika**, peppers chili, long, sweet, y pimento o pimienta.

ESPECÍFICAS:

Punto 5.b

Se debe tener presente que el envasado en atmosfera modificada es eficaz impidiendo el desarrollo de bacterias nocivas estrictamente aeróbicas, pero otras bacterias que provocan intoxicaciones alimentarias como *Clostridium sp.*, *Campylobacter sp.* y *Listeria monocytogenes* no se ven afectadas por el envasado en atmosfera modificada.

Apéndice 1, punto 7:

Se debe incluir como definiciones al envasado y embalaje, pues son dos términos diferentes y aparentemente se les da igual tratamiento en el Apéndice.

Definiciones a tener en cuenta:

ENVASE: Es el recipiente de cualquier material que sea y cualquiera sea la forma que adopte, está destinado a contener mercancías, para su empleo a partir del mismo y destinado a individualizar, dosificar, conservar, presentar y describir unilateralmente las mercancías, pudiendo estar confeccionando con uno o más materiales distintos.

EMBALAJE: Recipiente, generalmente grande, en el que se introducen productos envasados, envueltos y/o unidos, así como sueltos (a granel), para su embarque y distribución. También llamado envase terciario.

Fuente: Envases y embalajes para la exportación. Junio 2009. UE-PE-PENX. Ministerio de Comercio Exterior y Turismo/Delegación de la Comisión Europea en el Perú/SGS, a ser tenidas en cuenta.

Punto 11.a.

En cuanto a la estructura general a seguir se debería incluir:

- Prácticas recomendadas antes, durante el desarrollo del cultivo y en la etapa de post cosecha.
- Prácticas después del secado: selección y envasado (párrafos 46 y 47).

THAILAND

Thailand appreciates the great efforts of Spain as chair and India and the Netherland as co-chairs of the EWG in preparing the draft Code of Practice for the prevention and reduction of mycotoxin contamination in spices. We would like to submit comments as follows:

General comments:

The draft COP is developed on the basis of the information on protecting and reducing mycotoxin contamination in spices. When the scope of the draft COP is extended to recommended practices for spices and dried aromatic herbs. So, some measures are not related to dried aromatic herbs. It should be indicated that measures are general information or specific for spices or dried aromatic herbs.

Moreover, some measures of the main body of the draft COP are specific for certain groups of spices. They should be moved to the Annexes.

Specific comments:

Main body

2.1 Pre-harvest agricultural conditions

- *Para 19*: we think that the sentence "Spray irrigation should be avoided during the flowering period" is recommended for spices which is not related to herbs and some spices in bulbs such as garlic.

- *Para 22*: we would like to amend the sentence as follows:

"The use of treated organic waste is encourage in order to improve soil fertility and increase competitive fungi. Also, it is recommended..."

2.2.3 Storage (fresh product)

- *Paras 32, 33, 34*: Text in these paragraphs are not suitable for fresh product, for example, adequate drying to less than 10% moisture, the use of fumigants or insecticides, and treatments with chemical. Due to fresh product are stored in a short period of time prior to further process. We suggest to remove them to other appropriate sections.

2.3.2 Processing

- *Para 39*: we request the clarification on a safe moisture level to prevent mycotoxin production in spices, which is indicated that spices should be dried to achieve a water activity (A_w) below 0.60. The existing Codex COP, for example, the COP for the prevention and reduction of aflatoxin contamination in peanuts and the COP for the prevention and reduction of mycotoxins contamination in cereals recommend A_w of less than 0.70.

- *Para 43*: we suggest to move this paragraph to section **2.2.3 Storage (fresh product)** because the text is related to fresh spices which should be processed as quickly as possible and not be stored for long period of time.

- *Para 44, 1.(c), (d)*: we suggest to move these two bullet points to specific Annexes of the COP. Because the text specifically for drying practices of spice groups of fruits or leaves such as the layer thickness and raking time.

- *Para 44, 2.(v)*: we think that the detail in para. 44, 2.(v) is too prescriptive. We would like to suggest the deletion of this paragraph.

- *Para 44 3.(b)*: we suggest to move this bullet point to specific Annexes of the COP because smoke drying is specific for certain spices and dried aromatic herbs.

- *Para 47*: we suggest to delete the example of fumigants such as ethylene oxide because this substance is not permitted in the pesticide list of CCPR.

2.3.4.1 Preventing moisture contamination

- *Para 62*: we think that the specification of temperature and humidity sensors inside the containers is too stringent and not suitable and unnecessary for all transportation. We suggest to revise the sentence to specifically cover the product that requires a long period of transportation time as following.

~~“...Temperature and humidity sensors should be used inside the containers in order to detect fluctuations that might cause mold growth during transportation. For product that requires a long period of transportation, temperature and humidity should be monitored, where appropriate. Spices absorb moisture quickly...”~~

2.3.4.2 Hygiene practices during transportation

We suggest to delete this section because this COP should focus on measures to prevent and reduce mycotoxin contamination other than hygienic practices. Some measures in the Section are also redundant with the Code of Hygienic Practice for Spices and Dried Aromatic Herbs of CCFH.

2.3.5 Packaging and 2.3.6 Labelling and distribution/information to consumers

We suggest to revise the text to be flexible and relevant to the scope indicated for the prevention and reduction mycotoxins contamination.

Annexes

We support the recommendation of the EWG to develop specific annexes for each group of spices.

However, we propose to separate the group of Dried fruits and Berries into 2 Groups as Dried Fruits and Dried Berries because the product in these two groups are both traded predominantly in international market. Also, measures to prevent and reduce mycotoxin in group of Dried Fruits such as dried chilli are different from group of Dried Berries such as dried pepper.

Furthermore, we propose to add the Annex of the group of Dried Aromatic Herbs in which measures are different from spices. This type of product is harvested fresh and then dried to required moisture content.

USA

The United States supports the development of a COP as it would be helpful to governments, farmers, industry and consumers in reducing mycotoxin levels in spices. We agree with the five recommendations listed under paragraph 6 of the document. The United States does not agree with establishing different annexes for each group (Group 1 and Group 2) of spices, with each annex covering both aflatoxin and ochratoxin A, and recommends instead the following options for proceeding with the work on annexes:

- Develop annexes for each mycotoxin, as in the *Code of Practice for Prevention and Reduction of Mycotoxin Contamination in Cereals*, or
- Develop annexes for each spice/mycotoxin combination outlined in the Priority List of Spices, ANNEX VI, Discussion Paper on Mycotoxin Contamination in Spices (prioritization for potential work on maximum levels for mycotoxins in spices), CX/CF 15/9/15 February 2015.