

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 (a), 10 (b), 13, 14, 15 and 18

CRD10

ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

14th Session

(virtual)

3-7 and 13 May 2021

Comments of Republic of Korea

Agenda Item 5

Republic of Korea supports establishing maximum levels of chocolates containing or declaring <30% total cocoa solids based on the ALARA principle. We would like to finalize the work on the establishing of MLs.

Agenda Item 6

Republic of Korea supports the cut-off value (less than 5% rejection rate) used by eWG to propose maximum levels of cadmium in "Chocolates with $\geq 30\%$ to <50% of total cocoa solids" and "cocoa powder with 100% cocoa solids". The approach of setting MLs should be consistent with approach already taken for setting Codex MLs for other category of chocolates and cocoa-derived products.

Agenda Item 7

Republic of Korea supports the proposed draft COP by eWG for the prevention and reduction of cadmium contamination in cocoa beans.

Agenda Item 8

Republic of Korea agrees with the establishing maximum levels for lead in certain food categories based on the ALARA principle. However, we would like to submit the following comments on the proposed draft MLs of lead in some products:

- Regarding the proposed MLs for lead in "Dried fruits and berries", we propose that the additional hypothetical MLs should be analyzed to cover the sample rejection rate in lower lead level than the proposed MLs of 0.6 mg/kg (Appendix II-Table 5). Therefore, additional data of dried fruits and berries should be presented for clearly consideration.
- We support the setting of MLs for lead in rhizomes, bulbs and roots excluding turmeric considering that lead chromate based yellow pigment was being added to turmeric during processing. we suggest that it is necessary to call for data on lead occurrence in turmeric and conduct the establishment of separate MLs for turmeric.

Agenda Item 9

Republic of Korea would like to submit the following comments:

- We support the proposed draft revision of COP for the prevention and reduction of lead contamination in foods which provides additional information on potential sources of lead in food and reflects new information available on measures to reduce lead.
- We support requesting CCFA for reviewing the lead specifications for diatomaceous earth and charcoal (activated carbon) and evaluating bentonite to determine if available data support development of a lead specification.

Agenda Item 10(a)

Republic of Korea would like to submit the following comments:

- We support to adopt the same cut-off value (less than 5% rejection rate) for grain and processed products to maintain consistency and would like to express its agreement with the proposed draft maximum levels (MLs):
 - Maize grain, destined for further processing** 15 µg/kg
 - Flour, meal, semolina and flakes derived from maize** 15 µg/kg
 - Husked rice** 15 µg/kg
 - Cereal-based Food for infants and young children** 1 µg/kg
- We support that food data intended for human consumption need to be analyzed to derive the maximum levels for maize grain.
- Considering that aflatoxins contamination of cereals does not follow a normal distribution due to environmental factors such as climate, we agree to include data outlier regarded as the result of actual contamination.

Agenda Item 10(b)

Republic of Korea would like to submit the following comments:

- We support simultaneous consideration of sampling plans and methods performance criteria with maximum levels for aflatoxins in cereal and cereal based products including foods for infants.
- Although it is desirable that the sampling plan should be aligned with the sampling plans already mentioned in the CXS 193 – 1995, it is necessary to improve by referring to international standards (ISO 24333:2009).
- We support requesting advice from CCMAS for establishment of sampling plans and methods performance criteria.

Agenda Item 13

Republic of Korea would like to submit the following comments:

a) Maximum levels for additional fish species

Republic of Korea agrees to postpone a year for additional data collection proposed by eWG, considering the lack of methylmercury data in Patagonian toothfish.

We suggest that work on the MLs for in Antarctic toothfish should be also discussed after further data collection for methylmercury.

b) Sampling plans

The maximum weight category (proposed as >0.5Mt) in the table 2 is too small compared to the sublots weight of ≥1500Mt group in table 1 which is 500Mt. If the selected samples are small and do not adequately represent the population, the actual methylmercury level might be underestimated. We agree to develop sampling plans based on the weigh/value approach in paragraph 75, but propose to modify table 2 as follows.

Table 2. Number of incremental samples to be taken depending on the weight of the lot/sublot

Lot/ subplot weigh t(MT)	Number of incremental samples	Minimum aggregate sample weight (kg)
≤0.05	3	1
>0.05-≤0.5	5	1
>0.5-≤500	10	1
>500	20	1

Agenda Item 14

Republic of Korea would like to submit the following comments:

- We support development of Code of practice for the prevention and reduction of mycotoxins contamination in cassava and cassava-based products with focus on aflatoxins and ochratoxin A
- We agree that additional data and information of HCN in cassava and cassava based-products should be reviewed to discuss the feasibility establishing MLs for cassava and cassava-based products.

Agenda Item 15

Republic of Korea would like to support the work for including quinoa in the maximum levels (MLs) for lead and cadmium in cereals in the *General Standard for Contaminants and Toxins in Food and Feed (GSCTFF)* (CXS 193-1995).

Agenda Item 18

Republic of Korea supports the implementation on trial basis of option proposed by the eWG for a period 3 years.