CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 7, 8, 10(b), 13, 14 and 15 **CRD08**

ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON CONTAMINANTS IN FOODS
14th Session
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Comments of Thailand

Agenda Item 7: Code of practice for the prevention and reduction of cadmium contamination in cocoa beans (at Step 4)

Thailand would like to sincerely thank the EWG chaired by Peru and co-chaired by Ecuador and Ghana for their work in preparing draft Code of Practice (COP) for the prevention and reduction of cadmium contamination in cocoa beans. Thailand wishes to provide the following comments for consideration.

General comments

Thailand is of the view that the draft COP presents too descriptive detail and explanation, specifically the requirements under Section 4. "Recommended Practices to Prevent and Reduce Cd Contamination in Cocoa Bean", such as paragraphs 11, 12, 20, and 21, emphasize soil analysis. In practice, it should first evaluate the risk of planting area located in the environment causing contamination of cadmium; if necessary, the laboratory analysis would apply when the risk could occur. Section 4.2.1 "Strategies to Immobilize Cadmium in the Soil" should mention that "For only in case of the area evaluated and found the high concentration of cadmium in soil and farmers could not avoid using that area." The farmer who falls under this condition must follow the requirements. Moreover, some requirements present too detail or research data. For the COP, it should conclude all data and provide only the recommendations for the practices, which have precise scientific data showing the ability of the practice to prevent and reduce cadmium contamination.

Specific comments

Paragraph 15: Thailand would like to seek for clarification whether the scientific data prove any significant contamination of cadmium related to the area for the plantation that recommends being far from the road to reduce the exposure of the cacao plantations to gas emission which generally concern only lead contamination. If there is not enough clear data, Thailand suggests that the above-mentioned recommendation should be excluded.

Paragraph 20: Regarding the recommended method of analysis or requirement of soil analysis with the Accredited Laboratory ISO/IEC 17025: 2017, Thailand believes the matter should focus on the analysis in the food rather than soil. Hence, Thailand believes that determining the soil analysis method is not necessary for the requirement under Section 4.2 "From the Production to the Harvesting Phase."

Paragraph 43: This requirement is too detailed. It should summarize the data to be relevant to what the recommendation of Mucilage draining is. Thailand is of the view that there is no need to provide the detailed study result.

Paragraph 48: Thailand would like to seek for clarification how the fermentation process at 80% is measured and how it is considered.

Section 1.4 Transport phase: Some practices may not involve cadmium contamination, such as protection against rain, covering with absorb-condensation materials, and ventilation holes in containers which are other matters that should not include. Hence, Thailand proposes that the requirements should prescribe only practices related to cadmium contamination.

Agenda Item 8: Maximum Levels for lead in certain food categories (at Step 4)

Thailand wishes to express its appreciation to the EWG chaired by Brazil on the establishment of MLs for lead in certain food categories as well as take this appropriate opportunity to assert comments on this issue.

General comments

In general, Thailand noted that the establishment of MLs for lead in selected commodities considered using the ALARA principle and the sample rejection (range between 2%-5%), which depends on the types of products. Other factors such as safety effect, impact on trade, and population in some regions will also be considered case by case. For example, to set up the ML for lead in culinary herbs and spices, which has a small consumption quantity, an acceptable ML may have a low rejection rate that has a more negligible effect on intake reduction. As CCCF will consider this matter in Agenda Item 17 Guidance on data analysis for development of maximum levels and for improved data collection, it would be helpful to consider the ML establishment.

In terms of the ML establishment for preserved eggs, we would like to inform that the General Standard for Food Additives (CODEX STAN 192-1995) includes the alkaline egg under *Food Category 10.3 Preserved egg, including alkaline, salted, and canned eggs*. Therefore, the alkaline egg data should be analyzed as preserved egg for establishing ML.

Importantly, regarding the call for data requested by JECFA on 21st July 2020, Thailand submitted the lead concentration data in alkaline eggs (299 samples) and fresh herbs (546 samples) to GEMS/Food. However, we could not find our above-mentioned data in Table A.1 and B.1, respectively. Therefore, we would like to ask an Electronic Working Group (EWG) to review the data for re-consideration.

Specific comments

If the Committee decides to consider the proposed MLs for the different food categories, Thailand would like to provide our comments as following:

Eggs: Thailand does not object to the proposed ML for lead of 0.1 mg/kg. However, Thailand would like to ask the EWG whether the proposed ML at 0.1 mg/kg for lead in duck egg, shown in Table 1, provides a rejection rate of 0% is correct. Hence, we would like to request the EWG to re-consider and adjust the above-mentioned rejection rate.

Preserved egg: As noted in the general comments, according to the preserved egg data presented in Table A.1, the results did not yet contain the submitted alkaline egg data from Thailand. Therefore, we would like to ask the EWG whether the data was included in the analysis.

Additionally, to set an ML for lead in preserved eggs, it is obvious that preserved eggs show a significantly high lead concentration comparing with other eggs, and there are available sufficient data from other countries to consider.

Fresh culinary herbs: According to fresh herbs data presented in Table B.1, the results did not contain the submitted fresh herbs data from Thailand. Thus, Thailand would like to ask the EWG whether the data was included in the analysis.

Regarding the alignment of the ML for fresh herbs by assuming the same MLs (at 0.3 mg/kg) for lead in leafy vegetables, it is noticed, in Table 4, that related data and rejection rate for the consideration on assumed MLs not provided yet.

Dried culinary herbs: Thailand does not object to the proposed ML for lead of 2 mg/kg with an intake reduction of 73.9% and a rejection rate of 1.7% as an acceptable level.

Dried fruits and berries spices: As a small consumption quantity in spices, the ML that provides a low rejection rate is acceptable. Moreover, there are no significant differences between the percentages of intake reductions at the ML 0.8 mg/kg and 0.6 mg/kg as 41.4% and 44.8%, respectively. Hence, Thailand agrees to establish the ML at 0.8 mg/kg as it provides a rejection rate of 2.8%

Dried rhizomes, bulbs and roots spices: Thailand believes that it is inappropriate to take into account the proposed ML by using data of dried rhizomes, bulbs, and roots spices excluding turmeric data (340 samples) as it could not identify that whether any samples contain lead chromate, whereas lead may occur in turmeric. The dried turmeric data, in Table B.1, represents the highest lead concentration at 135.7 mg/kg. Therefore, Thailand would like to ask the EWG to cut outlier, which is probably less than 340 samples, and re-analyze the data.

Dried bark spices: As a small consumption quantity in spice, the ML that provides a low rejection rate is acceptable. Therefore, Thailand agrees to establish the proposed ML at 3.0 mg/kg due to an appropriate rejection rate of 3.9%

Dried floral parts spices: Thailand does not object to the proposed ML for lead of 0.7 mg/kg, which provides an acceptable intake reduction of 27.9% and a rejection rate of 3.5%, respectively.

Dried seeds spices: As a small consumption quantity in spices, the ML that provides a low sample rejection rate is acceptable. Therefore, Thailand agrees to establish the proposed ML at 0.8 mg/kg due to an appropriate rejection rate of 2.0%

White and refined sugar: Sugar is a major food category and of importance for global production and international trade. Also, there are some national standards for sugar established mostly the ML for lead in sugar at either 0.5 mg/kg or 1 mg/kg. Therefore, analyzing and proposing the hypothetical ML at 0.1 mg/kg or lower as presented in Table 6 of CX/CF 21/4/8, may be inappropriate. By excluding the identification of higher hypothetical ML could result in insufficient and unclear information to decide for ML. Hence, Thailand would like to suggest re-analysing and re-evaluating further data which represent higher hypothetical ML such as 0.2 mg/kg, 0.5 mg/kg, and 1.0 mg/kg to obtain effect of sample rejection and intake reduction. If possible, we would also like to ask the EWG to call for further data.

Raw and brown sugars: Thailand does not object combining the data of raw sugar and brown sugar in order to propose the same ML. However, Thailand would like to suggest the EWG to re-evaluate the effects of the implementation of hypothetical MLs for lead on combined data of raw and brown sugars at 0.2 mg/kg up to 1.0 mg/kg with its sample rejection and intake reduction. It may be useful to compare the proposed ML for white and refined sugar with that of the raw and brown sugar since they have higher lead occurrence than the white and refined sugar. Moreover, Thailand noted that raw sugar has very high-volume international trade. Thus, the amount of data should be greater and sufficient to support the establishment of ML.

Honey: Thailand would like to propose the ML for lead of 0.1 mg/kg, which has an appropriate rejection rate of 1.4%

Syrup and molasses: Thailand does not object to the proposed ML for lead of 0.1 mg/kg, which has an acceptable rejection rate of 3.6%.

Candies: Thailand believes it is important to restrict the establishment of ML for lead in candies as children consume in great quantities. Therefore, mainly considering on intake reduction, the ML at 0.2 mg/kg (12.0% intake reduction; 1.1% rejection rate) and the ML at 0.15 mg/kg (33.2% intake reduction; 4.7% rejection rate) present the rejection rate between 2%-5%. However, the ML at 0.15 mg/kg is more appropriate because it shows the lower intake reduction from 12% to 33.2%

Fruit juices for infant and young children: Thailand potentially agrees with the recommendation from the EWG to establish the MLs for lead aligned with the existing MLs for lead in fruit juice that already established in the GSCTFF.

Cereal-based product for infant and young children: Thailand does not object to the proposed ML for lead of 0.04 mg/kg, which has a rejection rate of 4.7% in the range of protecting infant and young children's health.

Ready-to-eat meals for infant and young children: Thailand does not object to the proposed ML for lead of 0.03 mg/kg, which has a rejection rate of 2.8% in the range of protecting infant and young children's health.

Agenda Item 10(b): Sampling plans and performance criteria for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children

Thailand appreciates the efforts of Brazil and India in leading the EWG for preparing the proposed sampling plans and performance criteria for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children. Thailand would like to provide the following comments:

Thailand supports the EWG recommendations that it is premature to start considering sampling plans at the CCCF-14 until there is the finalize ML. We also agree with the establishment of the EWG to continue work on the establishment of sampling plans for the ML and requesting the CCMAS to consult regarding the establishment of performance criteria for a sum of AFB1, AFB2, AFG1, and AFG2.

Agenda Item 13: Discussion Paper on Methylmercury in fish

Thailand wishes to express its appreciation to the EWG chaired by New Zealand and co-chaired by Canada on the discussion paper as well as take this appropriate opportunity to assert comments on this issue.

1. Thailand does not object the establishment of MLs for Methylmercury in orange roughy, Patagonian toothfish, and pink cusk-eel as a new work.

2. Thailand does not object discontinuing the review of MLs for any other additional fish species.

3. Thailand agrees with the recommended sampling plans based on general provisions around length/weight approach; however, it needs to be discussed in detail.

4. Thailand agrees to undertake a literature review for assessing the feasibility of developing guidance for the management of methylmercury in fish.

5. Thailand agrees to re-establish the EWG to continue the work as above-mentioned recommendations.

Agenda Item 14: **Discussion Paper on Hydrogen cyanide and mycotoxin contamination in cassava and cassava-based products**

Thailand would like to thank the EWG chaired by Nigeria and co-chaired by Ghana for preparing the discussion paper.

1. Thailand agrees to develop the COP for the prevention and reduction of mycotoxins contamination in cassava and cassava-based products with focus on alfatoxins and ochratoxin A and to re-establish the EWG to develop the COP.

2. Thailand agrees to discontinue work on establishing the ML for HCN for cassava and cassava-based products due to insufficient and unclear data. Also, the HCN contamination could be currently controlled by the processing.

Agenda Item 15: Discussion Paper on Cadmium and lead in quinoa

Thailand would like to submit comments to the proposed MLs for cadmium and lead in quinoa as follows:

Thailand dose not object the proposed MLs for cadmium and lead in quinoa at 0.1 mg/kg and 0.2 mg/kg, respectively. Moreover, we do not object to the proposed approach to establish the MLs either extend the MLs for cadmium and lead in cereal grains to quinoa by adjusting a note in the CXS 193-1995 or separate MLs for cadmium and lead in quinoa.