

# 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, 15, 16, 18, 19, 20**

**CRD15**

**April 2024**

**ORIGINAL LANGUAGE**

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON CONTAMINANTS IN FOODS**

**17th Session  
15-19 April 2024**

*Comments submitted by Singapore*

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

Singapore notes that all of the MLs proposed are health-protective against levels of lead that would cause acute lead poisoning. However, we are concerned that the large number of categories proposed for dried spices, each having a different ML, could be challenging to implement for the following reasons:

- Prevalence of products consisting of a mixture of dried spices from multiple categories being traded and sold.
- Difficulty distinguishing and separating spice parts especially if the spice is the ground, powder or crushed form.

For these reasons, Singapore would like to propose for harmonised MLs for dried spices in line with the approach for dried and fresh culinary herbs i.e. to have a single category and ML for dried spices.

Considering that lead is ubiquitous in the food supply, dried spices contribute minimally to the total dietary exposures to lead due to their relatively low consumption by weight. Hence, some flexibility on the 5% rejection rate guideline can be tolerated in lieu of a harmonised, enforceable ML for dried spices. This ensures that the ML can be implemented reasonably and remains aligned with the principle of ALARA.

Comments specific to document CX/CF 24/17/5, Appendix I, para 1.1 (page 5)

Singapore would also like to suggest clarification that the spices listed in the footnotes are examples of dried spices and the ML applies to the entire category dried spices.

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

Singapore appreciates the work done by New Zealand as chair, and Canada as co-chair of the electronic working group to prepare the draft sampling plan for methylmercury in fish. Singapore supports the advancement of the draft sampling plan to step 5/8 for final adoption.

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

Singapore supports the proposed definition for RTE Peanuts except peanut butter. Peanut butter is a composite food that can consist of peanuts as low as 90% and other ingredients which could dilute the contamination levels from peanuts.

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

Singapore supports the consultation of other expert bodies and suggestions from CCMAS, particularly on the definition of spices considered as large and small.

Following the definition of large and small particle sizes, Singapore suggests the alignment of the sampling plan using FAO's Mycotoxin Sampling Tool (<http://tools.fstools.org/mycotoxins/>)

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

Singapore appreciates the work done by USA as chair, and France, Panama and Spain as co-chairs of the electronic working group to prepare the draft “Code of Practice/Guidelines for the prevention or reduction of ciguatera poisoning”. Singapore supports the advancement of the draft COP to Step 5 of the step procedure and wishes to provide the following comments:

- Para 21: based on the current phrasing, it is unclear if the paragraph is a recommendation of the CoP or for information. In addition, Singapore suggests the exclusion of imposing size limits on the fish in the CoP as such a practice could lead to unnecessarily significant rejections with little impact on reducing CP. Singapore recognises that countries imposing size limits on species of fish may have considered bioaccumulation factors, Singapore thinks that environmental factors and fish species are the more dominant factors for the occurrence of CTX.
- Para 38 “CTXs are known to concentrate in fish viscera, liver, heads and roe... recommended that this organs or parts from fish species linked to CP are not consumed...”: this paragraph describes an advisory for consumers. Singapore suggests transferring the paragraph under the section “Advice to Consumers and Healthcare Professionals”.
- Para 42 to 48: The CoP recommends advice to healthcare professionals and consumers but listed only one advisory, “CTXs may be transmitted through breastfeeding and unprotected sexual intercourse ... refrain from these activities.” For consistency, Singapore suggests the inclusion of other advisories in the section such as paragraph 4 in the introduction that describes the symptoms of CP.

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

Singapore appreciates the work done by EU as chair of the EWG to prepare the discussion paper on pyrrolizidine alkaloids.

Singapore does not object to the commencement of new work to update CXC 74-2014 including complementing the code with specific annexes for tea, herbs and herbal infusions, and spices. However, Singapore wishes to provide the following comments on the discussion paper:

- Clarification if the recommendation is to split the work into three EWGs working in parallel on the following:
  - Update of CoP for weed control to prevent and reduce PA contamination in food and feed (CXC 74-2014), excluding honey
  - Discussion paper for new CoP on prevention and reduction of PA in honey
  - Discussion paper on guidance for sampling and minimum analytical requirements for PA occurrence data.
- The recommendation and justification to develop a separate CoP for honey is insufficient. Singapore suggests considering the work as an annex under the revised CXC 74-2014 as this reduces redundancies in Codex texts. Alternatively, Singapore suggests that the discussion paper be revised to include a more thorough assessment on potential mitigating measures for honey sufficient to warrant a separate CoP. A brief search of the literature did not reveal many options beyond weed control:
  - <https://www.fao.org/3/cb5353en/cb5353en.pdf>
  - [https://www.sciencedirect.com/science/article/pii/S0924224422000073?ref=pdf\\_download&fr=RR-9&rr=8681bd6f3e796017](https://www.sciencedirect.com/science/article/pii/S0924224422000073?ref=pdf_download&fr=RR-9&rr=8681bd6f3e796017)
  - <https://www.tandfonline.com/action/showCitFormats?doi=10.1080/10942910600981708>
- On guidance for sampling, Singapore would like to clarify if this was to support the CoP (which could be included in the work to revise the CoP) or to support future calls for data.
- On analytical requirements, Singapore suggests alignment with the ongoing work on “Guidance on data analysis for development of maximum levels and for improved data collection” where the general principles were discussed. Singapore also suggests that the purpose of data calls be considered (e.g. to address data gaps for further risk assessments by JECFA or development of the revised CoP or future setting of MLs).
- Singapore suggests that a standalone document may not be necessary as analytical requirements for data can be specified during call for data exercises.
- In addition, CCCF should also consider if occurrence data should be as a sum of PAs or individual PAs, and if individual PAs, agreement on the relevant PAs to analyse.

**Agenda Item 11: Discussion paper on tropane alkaloids in foods**

Singapore supports the commencement of new work to develop a CoP to prevent and reduce tropane alkaloid contamination in food and feed.

Singapore does not support the inclusion of tropane alkaloids to the CoP for “Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed” (CXC 74-2014) as there are additional risk management measures recommended by the FAO/WHO expert group including monitoring, raw material source selection, improved grain cleaning and extra precautions for processed cereal-based food for infants and young children specific to tropane alkaloids and prevention of tropane alkaloid poisoning incidents.

**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)**

Singapore appreciates the discussion paper developed by Canada as chair and Japan and USA as co-chairs of the electronic working group and supports the review of this CoP as it will help with the implementation of good practices globally and subsequently lead to prevention and reduction of aflatoxin contamination in milk and milk products.

Singapore also supports the recommendation to merge CXC 45-1997 with CXC 51-2003 and the inclusion of animal feed in reviews of CoPs for the reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004) and Tree Nuts (CXC 59-2005). Singapore agrees with the discussion paper’s assessment that control measures for aflatoxins in cereals are based on GAP and GMP consistent with HACCP along the cereal value chain; these measures would not distinguish between grains for human or animal consumption. Singapore also agrees that the practice of food to feed diversion (and vice versa) further justifies having a single CoP for food and feed. The merger of the CoPs is in line with CAC’s recommendation to reduce redundancies in Codex texts.

Singapore notes that the review of CXC 55-2004 is discussed in CX CF 24/17/14 and suggests that the EWG to review CXC 55-2004 consider the recommendations presented in herein.

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

Singapore appreciates the work of the USA in developing the discussion paper presented. Singapore supports the development of the CoP and the development of annexes containing commodity-specific recommendations.

Singapore recalled that in JECFA’s assessments of cadmium, rice, wheat, root vegetables, tuber vegetables, leafy vegetables, other vegetables and molluscs – contributed significantly to the total mean dietary exposures to cadmium. Singapore suggests that the annexes should include these major food groups.

On whether the CoP for the “Prevention and Reduction of Cadmium in Cocoa Beans” (CXC 81-2002) should be maintained as a separate document or adapted as an annex, Singapore prefers the merging of both texts as this would reduce the number of closely related CoPs.

In addition, Singapore suggests, where necessary, that the recommended practices to reduce cadmium contamination should also consider that the levels of other heavy metals do not correspondingly increase (e.g. growing rice in anaerobic soil reduces cadmium levels but increases arsenic levels <https://link.springer.com/article/10.1007/s11104-019-04374-6>).

**Agenda Item 18: Review of Codex standards for contaminants**

Singapore supports the updates and revisions made by Canada as WG chair. Singapore has no new standards to recommend for inclusion in the Overall Highest Priority List.

**Agenda Item 19: Follow-up Work to the outcomes of JECFA evaluations and FAO/WHO expert consultations**

Singapore supports the commencement of new work and will be happy to support the chair of the EWG in the development of discussion papers for ergot alkaloids and/or T-2, HT-2 and DAS.

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**Agenda Item 20: Priority list of contaminants for evaluation by JECFA**

Singapore appreciates the efforts of member countries in gathering the information for the proposed hazards and USA in leading this important work. Singapore agrees with the current list of contaminants recommended for evaluation by JECFA.