



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

16th Session

18-21 April 2023 (physical plenary meeting)

26 April 2023 (virtual report adoption)

Comments submitted by Panama

Agenda Item 2: Matters Referred to the Committee by the Codex Alimentarius Commission and/or Its Subsidiary Bodies

Panama appreciates the great efforts by the CAC and recognizes the objectivity of its decisions and recommendations, as well as the agreements presented in the CCEXEC Executive Committee.

Agenda Item 3: Matters of interest arising from FAO and WHO including JECFA

Panama wishes to thank the report and the record of informative support provided by FAO and WHO in matters that have been included for the evaluation of the JECFA Expert Committee, where they addressed the issues of residues of veterinary drugs and food additives, which have been widely debated within its committees.

We appreciate and welcome the publication of *Thinking About the Future of Food Safety: A Forward-Looking Report*, which examines some of the most important emerging issues in food and agriculture, focusing on the implications for food safety, including the climate change, changing consumer behaviour and food consumption patterns, new food sources and new food production systems (such as edible insects, jellyfish, seaweed, plant-based alternatives and cellular food production), technological innovations and scientific advances, microbiome science, circular economy and food fraud.

Underlining the importance of recommendations such as having detected the need to collect reliable information on food consumption, obtained on an individual basis, to calculate dietary exposure to chemical and biological agents in the general population and in vulnerable groups, which in turn will help address the problem of insufficient access to such data,

We acknowledge the extensive and sufficient work of FAO and WHO, who have continued to work on two tools that were started in 2014, whose objective is to serve in the development of global databases on food consumption.

Agenda Item 4: Matters of interest arising from other international organizations

Panama thanks other international organizations that continue to work together to provide updated information and that provide relevant data as technical support, which on many occasions are important tools to support new proposals within the committees.

Agenda Item 5: Maximum levels for lead in certain food categories

Panama agrees with the proposed limit for Brown Sugar, expressed for the crude and uncentrifuged product proposed in Appendix I to be 0.15 mg/kg.

In relation to ready-to-eat meals for infants and young children, Panama agrees with maintaining what was already accepted at the CCCF15 meeting, where it was recommended to establish a single maximum level of 0.02 mg/kg for the entire category.

Agenda Item 6: Code of Practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products

Panama wishes to thank the work carried out by Nigeria as Chair and Ghana as Co-Chair, we consider a very important work in relation to the reduction of mycotoxins in cassava and cassava-based products.

In paragraph 3, the project talks about inocula that are used in the Codes of Practice (CoP), to improve the syntax, it is advisable to use the word in plurality, therefore, innoculums must be innocula, so it is recommends using the word innocula in the text used.

Also in this same paragraph 3, it indicates ... Storage duration may play a role in mycotoxin production, as it is known that the risk of postharvest fungal infection and production of mycotoxins in stored grain increases with the storage duration as indicated in the Code of practice for the prevention and reduction of mycotoxin contamination in cereals... given that we consider the term know is not correctly used in the wording when translated into Spanish, therefore we recommend the word known be used.

...Length of storage may play a role in mycotoxin production as the risk of postharvest fungal infection and mycotoxin production in stored grain is known to increase with length of storage as outlined in the Code of Practice for the prevention and reduction of mycotoxin contamination in cereals...

In paragraph 18, there is a writing error for the word and possible which should read and possible rot. The amount of roots to be harvested should be determined based on market needs and demand, which in Spanish should say: ...The harvest must imply adequate planning to maintain quality and avoid harvest waste and possible rot. The amount of roots to be harvested must be determined based on the needs and market demand...

We wish to point out that in paragraph 22 indicating its approach to the Water Activity (AW) of the revised Code of Practice, it is detailed:

...Water activity (aw), commonly defined in foods as the water that is not bound to food molecules that can support the growth of bacteria, yeasts, and fungi...

...Water activity (aw), commonly defined in food as water that is not bound to molecules in food that can support the growth of bacteria, yeast and fungus...

We consider it should be said, as follows, that expressed in Spanish it would be better understood.

...Water activity (aw), is commonly defined in foods as the water that is not bound to food molecules that can support the growth of bacteria, yeasts, and fungi...

...Water activity (aw) is commonly defined in food as water that is not bound to molecules in food that can support the growth of bacteria, yeast, and fungus...

Panama recommends progress from step 7 to step 8 for approval in the next Codex Alimentarius commission, CAC46 in November 2023.

Agenda Item 7: Sampling plans for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children

Panama appreciates the extensive work carried out in this section and underlines what has been discussed for sampling plans and performance criteria for aflatoxins (AFB1+AFB2+AFG1+AFG2) in flour, semolina, semolina and corn flakes, it is not clear and it is confusing establish that in the sampling plan and performance criteria for aflatoxins AFB1+AFB2+AFG1+AFG2, in the decision-making function it indicates that if the laboratory result is equal to or less than 15 µg/kg, the lot is accepted, otherwise otherwise it will be rejected, since the maximum level is 10 µg/kg.

It also occurs in the section that focuses on husked and polished rice where it is indicated that the laboratory sample is equal to or less than 15 µg/kg, the lot is accepted. Otherwise, reject", in circumstances where the maximum level is 20 µg/kg, and if the laboratory sample is equal to or less than 15 µg/kg, the lot is accepted. of the

Otherwise, it was rejected, in circumstances that the maximum level is 10 µg/kg, respectively.

Panama suggests that this sequence of approach in the sampling plan be reviewed since a possible confusion to what is expressed in the text is evident.

In relation to sampling plans and performance criteria for aflatoxins (AFB1+AFB2+AFG1+AFG2) in cereal-based foods for infants and young children for food aid programs

It is important to note that infants and young children are more sensitive to certain foods early in life than in the early years of development, therefore the MRLs for aflatoxin should be the same in infant foods. and young children and in food destined for aid programs.

Agenda Item 8: Maximum level for total aflatoxins in ready-to-eat peanuts and associated sampling plan

Panama greatly appreciates the efforts and work carried out within the Electronic Working Group, and we greatly appreciate the recommendation that documents can be presented for debate, with the necessary data for this to happen (technical and scientific data), at the next meeting. of the CCCF in relation to aflatoxins from ready-to-eat peanuts, in such a way that it works for members by obtaining regional (country) specific data.

Agenda Item 10: Discussion paper on the prevention and reduction of ciguatera poisoning

Panama thanks the Presidency and the Co-Presidents of the Electronic Working Group, where a document focused on the reduction of ciguatera poisoning was discussed and developed in an important way. We know the importance of this topic and based on the knowledge of the limitations that occurred in relation to the lack of data.

Panama supports that the GTE can continue developing the possibility of presenting a Code of Practice for the reduction and prevention of possible causes of ciguatera poisoning, and that this be presented within the Committee on Food Contaminants, in the same way as similar instruments have been presented in other Codex Committees.

It is important that the Codes of Practice provide guidance to producers based on surveillance and monitoring data, identifying the aquatic species of interest. It is also very important that the Codes of Practice provide guidance to fishermen and processors on good practices for the elimination of ciguatoxic animals.

Agenda Item 12: Guidance on data analysis for development of MLs and for improved data collection

Panama reiterates the need to be able to count on advice in a practical way on the guidelines to be proposed and those already agreed upon, in addition to receiving advice on the quantity or number of samples necessary, a number of samples necessary to serve as a basis for the execution of the analyzes validation of the concepts that concern CCCF.

Agenda Item 13: Forward work-plan for CCCF: Review of staple food-contaminant combinations for future work of CCCF

Panama considers it important to be able to evaluate the existing works and their progress in order to positively start other new works. It should be noted that Panama would agree to participate in the Electronic Working Groups that may arise for the development of the new works that are proposed, underlining the necessary critical examination of considering the priority of many of these compared to the already existing works in within the CCCF.

The evaluation will allow us to decide between the options:

Option 1: Continue this work through a GTE, using the same methodology.

Option 2: Continue this work through a GTE, using a different methodology

Panama is inclined to appreciate option 2. Promoting a different analysis methodology, using a decision tree as has been done in other Codex Committees, for evaluation of new works.

Agenda Item 16: Priority list of contaminants for evaluation by JECFA

Panama does not have particular comments, however, we support continuing with the evaluations in relation to the priorities, since the information that will be obtained will be valued and analyzed, giving as an example some contaminants such as arsenic in rice. Provisions that will provide opening in the revision of the national legislation of each country and will be of great value and support for the nations.