CODEX ALIMENTARIUS COMMISSION





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

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To be held at the Windsor Marapendi Hotel, Rio de Janeiro, Brazil

Comments submitted by Ghana on agenda items 6, 7, 8 and 9

Agenda Item 6: Proposed draft maximum levels for cadmium in cocoa and cocoa-derived products (at Step 4)

Ghana wishes to commend the eWG on development of maximum levels for cadmium in cocoa and cocoaderived products. We support the proposed classification for chocolates as well as the MLs for cadmium in chocolate and cocoa-derived products.

AGENDA ITEM 7: Proposed draft Code of practice for the prevention and reduction of arsenic contamination in rice (at Step 4)

Position: Ghana supports the development of a Code of Practice (COP) for the prevention and reduction of arsenic contamination in rice. However, we wish to propose the following revision to the text in para 3.6, 3.8, 5.1, 5.2 and 6.1 of Appendix1to ensure clarity.

- 3.6 [Inorganic arsenic is considered the significant toxic form of arsenic. in rice]
- 3.8 Aerobic condition of soil in a paddy field where rice is grown is {a condition that a paddy field is more aerobic than flooded condition.} [in well drained, [non-paddled][non-flooded] and unsaturated soils]
- 5.1 The effectiveness of measures should be monitored [by][measuring to assess] arsenic concentration in rice.
- 5.2 non-point source or [past] [historical] activities,
- 6.1 National or relevant food control authorities should share information on risks benefits of consuming polished rice among stakeholders in the light of arsenic concentrations and nutrient components **taking into consideration the health benefits risk associated with the consumption of husked rice.**[noting that there are health benefits associated with the consumption of husked rice][considering concerns regarding arsenic concentrations and the nutritional benefits of rice consumption]

AGENDA ITEM 8: Proposed draft maximum level for total aflatoxin in ready-to-eat peanuts (at step 4)

Ghana supports the setting of ML for total aflatoxin in ready-to-eat peanuts. We however propose an ML of 8.0 ppb for total aflatoxin in ready-to-eat peanuts.

RATIONALE: A maximum level of 8 ppb for total aflatoxin in ready-to-eat peanuts should not be too difficult to meet taking in to consideration a level of 4 ppb set in Europe. This level would ensure a reduction in the dietary consumption of aflatoxin without having significant impact on international trade in ready-to-eat peanut.

AGENDA ITEM 9: Proposed draft annex on ergot and ergot alkaloids in cereal grains (Annex to the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003)) (at Step 4)

Ghana supports the proposed draft Annex and its inclusion in the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals.