

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 16

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

12th Session
Utrecht, The Netherlands, 12 - 16 March 2018

DISCUSSION PAPER ON THE DEVELOPMENT OF A CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF CADMIUM CONTAMINATION IN COCOA

Comment submitted by EU, Kenya, Uganda, USA and AU

EUROPEAN UNION (EU)

The European Union and its Member States (EUMS) welcome the work on the discussion paper on the development of a Code of practice for the prevention and reduction of cadmium contamination in cocoa by the electronic Working Group chaired by Peru.

The EUMS support the development of a code of practice for the prevention and reduction of cadmium contamination in cocoa and agree with the recommendation for a progressive implementation of available mitigation measures, for the improvement of the infrastructure and equipment for drying and fermentation processes and for further work on listing validated practices. Therefore the EUMS support the project document to continue the work on the development of guidance to Member States and the cocoa processing industry on the prevention and reduction of cadmium contamination in cocoa beans during the production and post-harvest process.

The EUMS would like to comment that in the conclusions the only points that should be listed are those which are relevant for the development of a code of practice for the prevention and reduction of cadmium contamination in cocoa. Therefore, the statement that 'human intake of cocoa is low, so health risks from exposure to cadmium through cocoa consumption are low and not considered to be a health concern' should be removed from the conclusions.

The EUMS would like to comment that under the chapter 'mitigation measures for post-harvest processing', besides fermentation and drying processes also other post-harvest processes need to be considered like e.g. deshelling.

The EUMS would like to ask clarifications as to why as a mitigation measure the reduction of application rates of zinc containing fungicides is recommended, as in paragraph 28 it is indicated that increasing the levels of zinc in the soil would lead to a reduction of cadmium accumulation in cocoa. Furthermore, it is not clear why avoiding the use of pesticides in general is put forward as a mitigation measure.

KENYA

COMMENT: We appreciate the work of the EWG and we have no objection for the work to proceed on.

Comment: We support the development of a Code of Practice for the prevention and reduction of cadmium contamination in cocoa for reasons given under agenda 6.

UGANDA

Uganda supports the development of the Code of Practice considering that cocoa beans are a key export commodity for the country. Although the data in Table 1 shows that the cadmium content of cocoa beans in Uganda is low, it is desirable to keep them as low as reasonably achievable. Case studies will be conducted with in Uganda's cocoa value chain following the various mitigation measures provided by the EWG. The findings will be shared with the EWG.

UNITED STATES OF AMERICA (USA)

- The U.S. supports the development of this Code of Practice.
- The U.S. supports the recommendation to conduct a survey about validated practices for the prevention and reduction of cadmium contamination in cocoa among Codex cocoa producing country members prior to starting new work on the development of a Code of Practice.

AFRICAN UNION (AU)

Position 1: African Union supports the development of a Code of Practice for the prevention and reduction of cadmium contamination in cocoa

Issue & Rationale: Cocoa is a valuable commercial crop that contributes to the economies of several developing countries including Cote d'Ivoire, Ghana, Nigeria and Cameroon. Cadmium levels in cocoa has attracted attention lately such that Codex is currently in the process of proposing MLs for cadmium in chocolates and cocoa-derived products. The 11th CCCF (2017) agreed to the development of a discussion paper by an EWG led by Peru for consideration and discussion at the 12th session with the view to commencing new work on this issue. The EWG was further charged to prepare a project document on the opportunity to develop the COP and outline the the risk mitigation measures available that would support the development of the COP.

This Code of Practice is expected to provide technical guidance to member countries and the cocoa production industry on the prevention and reduction of cadmium contamination in cocoa beans during production and post-harvest processing.

Position 2: African Union supports the risk mitigation measures currently available and listed by the EWG to support the COP.

Issue and Rationale: The EWG has outlined various risk mitigation measures which can be used as a starting point for the development of the COP. The main categories of mitigation measures provided by the EWG include the following:

- Identification of sources of contamination
- Agricultural practices to reduce Cd uptake
- Mitigation measures for post-harvest processing
- Other mitigation measures

Current available information can be used to develop the COP and the document improved later when new information become available.