

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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

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Comment submitted by Ghana on agenda items 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16 and 17

GHANA

AGENDA ITEM 5: Proposed draft and draft maximum levels for lead in selected fruits and vegetables (fresh and processed) and other selected food categories in the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) (at Step 7 and 4)

SALT:

POSITION: Ghana supports the lowering of the level of lead from 2 mg/kg to 1 mg/kg.

RATIONALE: The level can be detected easily and the health of consumers will be protected without affecting trade.

AGENDA ITEM 6: PROPOSED DRAFT MAXIMUM LEVELS FOR CADMIUM IN CHOCOLATES AND COCOA-DERIVED PRODUCTS (AT STEP 4)

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

AGENDA ITEM 7: PROPOSED DRAFT MAXIMUM LEVELS FOR METHYLMERCURY IN FISH INCLUDING ASSOCIATED SAMPLING PLANS (AT STEP 4)

POSITION: Ghana supports the setting of ML of 1.4 mg/kg for tuna as group of fish.

More work is however required in order to determine the MLs of other fish species since the number of samples used is too small and their geographical distribution is limited. Ghana also supports the proposal of sending the sampling plan to the Committee on Methods of Analysis and Sampling (CCMAS) for endorsement

AGENDA ITEM 8: PROPOSED DRAFT REVISION OF THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF DIOXINS AND DIOXIN-LIKE PCBs IN FOOD AND FEED (AT STEP 4)

POSITION: Ghana supports the revision of the Code of Practice for the prevention and reduction of dioxins and dioxin-like PCBs to include additional measures and to include the nondioxin-like PCBs.

RATIONALE: Polychlorinated biphenyls (PCBs) have adverse health effects on humans, they are carcinogenic and persist in the environment for long.

AGENDA ITEM 9: PROPOSED DRAFT CODE OF PRACTICE FOR THE REDUCTION OF 3-MONOCHLOROPROPANE-1,2-DIOL ESTERS (3-MCPDE) AND GLYCIDYL ESTERS (GE) IN REFINED OILS AND PRODUCTS MADE FROM REFINED OILS, ESPECIALLY INFANT FORMULA (AT STEP 4)

POSITION: Ghana supports the development of the Code of Practice

RATIONALE: The heating process of refining oil produces 3-monochloropropane-1,2-diol esters (3-MCPDE) and glycidyl esters (GE) which are toxic to

the kidneys and the male reproductive organs. The CoP will provide guidance on 3-MCPDE and GE in refined oils.

AGENDA ITEM 10: PROPOSED DRAFT MAXIMUM LEVEL FOR TOTAL AFLATOXINS IN READY-TO-EAT PEANUTS AND ASSOCIATED SAMPLING PLAN (AT STEP 4)

POSITION: Ghana supports the setting of ML of 10 ppb for total aflatoxins in ready-to-eat peanuts.

RATIONALE: This level will protect consumers from the harmful effects of aflatoxin without affecting trade.

AGENDA ITEM 11: PROPOSED DRAFT MAXIMUM LEVELS FOR TOTAL AFLATOXINS AND OCHRATOXIN A IN NUTMEG, CHILI AND PAPRIKA, GINGER, PEPPER AND TURMERIC AND ASSOCIATED SAMPLING PLANS (AT STEP 4)

POSITION: Ghana supports the setting of ML for aflatoxins in all the five (5) spices at 30 ppb to promote trade since dietary exposure to mycotoxins as a result of spices consumption is insignificant.

Ghana is also in favour of the postponement of the submission of proposed draft ML for OTA in spices to CCCF 13 since limited data were used to arrive at the decision on OTA. Ghana also supports the revision of MLs and possibly establishes MLs for specific spices based on new available occurrence data after three years of implementing of the code of practice. This is because the code of practice was adopted in 2017 and it will be premature to set MLs after a year of adopting a COP. Comparative analysis of occurrence data generated before and after the implementation of the COP will not only be an assessment of the effectiveness of the COP but will lead to setting of better health and trade protective limits.

AGENDA ITEM 12: PROPOSED DRAFT GUIDELINES FOR RISK ANALYSIS OF CHEMICALS INADVERTENTLY PRESENT IN FOOD AT LOW LEVELS (AT STEP 4)

POSITION: Ghana supports the establishment of the Guidelines for risk analysis of chemicals inadvertently present in food at low levels and the recommendation made thereof, namely

- Agree to the definition of an emerging contaminant
- The use of a cut-off value as an initial risk management step,
- The use of an internationally agreed rapid risk assessment methodology,
- That feed is excluded from the proposed draft guidelines

Ghana also supports the EWG recommendation to CCCF12 to seek scientific advice from JECFA on the following:

- The criteria for establishing appropriate cut-off values, with the specific questions developed and timeframes,
- The role of JECFA in identifying and reviewing an internationally agreed rapid risk assessment methodology.

Since JECFA is the body responsible to provide scientific advice on international issues on food contaminants.

AGENDA ITEM 14: DISCUSSION PAPER ON FUTURE WORK ON MAXIMUM LEVELS FOR LEAD FOR INCLUSION IN THE GENERAL STANDARD FOR CONTAMINANTS AND TOXINS IN FOOD AND FEED

POSITION: Ghana agrees with prioritization criteria and list of foods identified for establishment of MLs for lead that are not included in the General Standard for Contaminants and Toxins in Food and Feed (GSCTFF). However Ghana does not support the commencement of new work for setting of MLs for food categories not included in the GSCTFF in CCCF 13 in 2019 since work on establishment of MLs for lead in the food commodities listed in the GSCTFF is not yet concluded and there are other works ongoing on the prioritized food categories that need to be completed before commencement of new work on same products.

AGENDA ITEM 15: DISCUSSION PAPER ON AFLATOXINS AND STERIGMATOCYSTIN CONTAMINATION IN CEREAL

POSITION: Ghana supports further discussion on aflatoxin and sterigmatocystin contamination and exposure in order to understand fully the appropriate measures to be taken. We also support establishment of a validated method for determination of sterigmatocystin in food and the generation of STC data to evaluate impact of MLs.

RATIONALE: Sorghum is an important staple food in Africa and it is advisable to take deliberate efforts to prevent and reduce sterigmatocystin contamination in it, through a code of practice and development of a validated method for determination of STC in foods. Although analytical methods for STC based on chromatographic techniques are available there is no internationally validated analytical method nor certified reference materials available for STC in cereals. Also data with a good geographical distribution is required in the setting of international standard.

AGENDA ITEM 16: DISCUSSION PAPER ON THE DEVELOPMENT OF A CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF CADMIUM CONTAMINATION IN COCOA

POSITION: Ghana supports the development of a Code of Practice for the prevention and reduction of cadmium contamination in cocoa. Ghana is a major cocoa producing country and the COP 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.

AGENDA ITEM 17: PRIORITY LIST OF CONTAMINANTS AND NATURALLY OCCURRING TOXICANTS FOR EVALUATION BY JECFA

POSITION: Ghana supports the priority list for evaluation by JECFA since the chemicals are relevant to Africa and they are contaminants in most of our staple foods such sorghum, rice and maize.