

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 5-10, 12, 19, 20

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ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON CONTAMINANTS IN FOODS

15th Session

Virtual

9-13 and 24 May 2022

Comments of Uganda

#### Agenda Item 5: CX/CF 22/15/5

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Uganda has a reservation on the proposed limits as it is generating data on MLs for Cadmium in 100% total cocoa solids on a dry matter basis.

#### Agenda Item 6: CX/CF 22/15/6

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Uganda appreciates the ongoing work on Code of practice for prevention and reduction of Cadmium contamination in cocoa beans.

Uganda therefore, supports the progression of the code to the next step and we express interest in adopting the code after its final development stage.

#### Agenda Item 7: CX/CF 22/15/7

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Uganda proposes postponement of the set maximum limits on basis of first drafting and implementing a code of practice for prevention and reduction of lead contamination in eggs, culinary herbs and spices.

#### Agenda Item 8: CX/CF 22/15/8

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Uganda appreciates work done by the EWG and has no objection on work progressing to the next step.

Uganda however, has a reservation on the proposed maximum limits for methyl-mercury and sampling plan for the species (Orange roughy and caskeel) and setting MLs for methyl mercury for Patagonian tooth fish.

#### *Justification*

No available country data on MLs for methyl-mercury and sampling plan for the Orange roughy and cask-eel fish species. In addition to the fish species being a rare variety, Uganda does not trade in the fish species.

#### Agenda Item 9: CX/CF 22/15/9

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Uganda proposes maximum limits for total aflatoxin as 10 µg/kg AFT for cereals and 2 µg/kg AFT for cereal based products for infants and young children.

#### *Justification*

Due to repeated exposure in consumption of the food category on regular basis, this could subject high risk to consumers in Uganda. This is because the cereals and cereal-based foods are staple food consumed in Uganda by all age groups on a daily basis thus need for lower limits of AFT.

Vulnerability of the target population (infants and young children) that possess it to a high risk of aflatoxin toxicity effects, if the infants and young children consume foods contaminated with aflatoxins hence a much lower ML needed for this category of food.

#### Agenda Item 10: CX/CF 22/15/10

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Uganda to seeks clarity on the terms "shell, testa and husk" from the EWG.

Uganda further proposes adoption of maximum levels of 10 µg/kg aflatoxin in ready to eat peanut.

#### *Justification*

The available limited data in Uganda supports the set limit of 10 µg/kg in according to the East African Community standard for peanut thus the proposed limit is implementable/achievable.

**Agenda Item 12: CX/CF 22/15/12**

Uganda appreciates work-done by the EWG on development of the Code of practice for prevention and reduction of mycotoxin contamination in cassava and cassava products. Uganda notes that the code is implementable. However, Uganda has some input in the code as follows under different paragraphs.

**Section 1: para 4**

Need to rephrase the rates of medium varieties in terms of taste for example to consider; '≤ 50 mg/kg as sweet cassava and ≥ 50 mg/kg as bitter cassava'.

**Justification**

The range between 51 mg/kg to 99 mg/kg is not classified yet is supposed to be bitter and cassava under this category needs to be detoxified prior to consumption.

**Section 2.2: para 11**

Need to insert the 'use of inorganic fertilizers' as well in the paragraph.

**Justification**

Inorganic fertilizers are also applied during cassava farming.

**Section 2.3: para 12**

Need to include the issue of responding to eating market, Uganda has a huge market for both processed and unprocessed cassava. The market faces a challenge on which variety is good for making snacks or other foods thus need to include a bullet under the paragraph on:

- 'Eating quality traits for both the processed and unprocessed food market for cassava'.

Need to rephrase bullet one and change the word 'germinate' to 'sprout' in the document.

**Justification**

- Cassava is not propagated by seed

**Section 3.1: para 13**

Need to consider recent research on plant spacing and include other spacing, for example use of 0.8 m x 1m in addition to 1m x 1m.

**Section 4.1: para 22**

There are harvesting situations in Uganda, where cassava is harvested during different seasons when the soil is soft or hard. Uganda proposes to the EWG to consider including;

Cassava roots should be harvested all through the different seasons to meet the market demand, however use of practices/ mechanisms that prevent damage or injury to the roots during the dry season when the soils are hard.

Cassava roots should be harvested with minimum amount of soil remaining on the roots to prevent contamination during processing stage.

**Section 4.3: para 25**

Need for clarity on the storage time in reference to cassava varieties and shorten time between harvesting and processing since after harvesting, the deterioration process immediately starts.

**Section 5.1: para 26**

Need to revise the processing period to 'within 24 hours' and not 8-12 hours.

**Justification**

12 hours not achievable for some farmers in Uganda

**Section 5.2: para 32**

Need to emphasize use of clean and dry surfaces when sun-drying cassava verses the listed examples of drying surfaces.

**Para 33**

Need to include the grated/mushed cassava

**Section 5.2.1: para 35**

Need to rewrite the sentence starting with;

'The fermentation of cassava is meant for further cyanide elimination, flavour development and product stability. Fermentation of cassava for traditional food processing is usually allowed to take a natural course, some optimization research has been carried out to the effect of using selected starter cultures. However, this method is not widely used. The sack in which the grated pulp or the container in which the peeled root will be kept, allowing for 2-5 days fermentation should be kept clean at all times and especially well cleaned before use, to ensure it does not become a natural source of inoculum'.

**Justification**

There is an editorial error at the start of the paragraph

**Agenda Item 19: CL 2021/89-CF**

Uganda proposes to prioritize the items as below, main basis is on criteria for the Establishment of Work Priorities as well as the relevant sections of the Risk Analysis Principles applied by CCCF.

1.2 Tropane alkaloids

2.2 Pyrrolizidine alkaloids

2.1 Ergot alkaloids

1.1 Marine biotoxins – Ciguatoxins

**Justification**

Uganda considers reports on early exposure of Tropane alkaloids toxicological effects to its people in Karamajo due to consuming super cereals contaminated with Tropane alkaloids, thus Uganda considers this as a first priority for country.

Uganda would also like to propose pyrrolizidine alkaloids second priority because of its available in many plants species in Uganda for-example tea.

**Agenda Item 20: REP21/CF14, Appendix VIII**

Uganda would like to propose inclusion of maximum limits for Cadmium in processed root vegetable juice (Beetroots and carrots) as a new work item for JECFA consideration.

**Justification**

Root vegetables such as carrots and beetroots are exported to countries within the East African region and beyond the region.

Root vegetables are the main raw materials used in production of the processed root vegetable juice that would cause toxicological effects on repeated consumption/exposure to the consumers.

Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade.

The needs and concerns of developing countries.