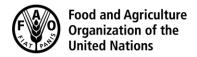
## CODEX ALIMENTARIUS COMMISSION





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Agenda Items 6 and 9

CRD34 April 2023 ORIGINAL LANGUAGE ONLY

## 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 the Institute of Food Technologists (IFT)

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

IFT supports the implementation of the Code of Practice regarding mycotoxin prevention and reduction for cassava that is now at step #7.

However, IFT would like to highlight some recommended changes to the wording of the document:

- 1. IFT is unaware of evidence supporting inclusion of *A. nomius* as a producer of aflatoxins in foods (it produces them in other situations).
- 2. IFT would like to highlight that porcine nephropathy is not relevant in humans. Ochratoxin A has been ruled out as a possible causative agent for BEN it is now known to be caused by aristolochic acid.

Lastly, IFT would remind the committee of the challenge growers and harvesters face in following all the recommended practices found in this code of practice (pre-planting, planting, and harvesting stages). Farmers are to be encouraged, by sustainability and agronomical knowledge, to rotate cassava and maize if there is an issue with disease, as well as cassava and legume crops (such as groundnut) for improving soil fertility and prevent erosion. Therefore, it is not simple to agree on all agricultural practices for every situation, especially for different crop backgrounds and regions. All the elements of this code of practice should not be seen as prescriptive but set as guidance for relevant measures to be applied as appropriate considering the situation.

## Agenda Item 9: Maximum levels for total aflatoxins and ochratoxin A in nutmeg, dried chili and paprika, ginger, pepper and turmeric and associated sampling plans (at Step 4)

IFT agrees with and supports the proposed MLs in Appendix I on total aflatoxins and ochratoxin A in dried chili pepper and nutmeg. It is important to recognize such MLs to safeguard the food supply and public health. We also encourage the adoption of similar MLs for other spices including ginger, black & white pepper, and turmeric. While the occurrence of mycotoxins is less common with them, spices other than dried chili pepper and nutmeg are also known to be contaminated with aflatoxins and ochratoxin A according to the literature. It is particularly true when we consider climate variability that may affect spice product fungal infection and growth, as well as mycotoxin contamination in unpredictable ways, depending on the sourcing region and climatological variability. Hence, establishing an ML for the aflatoxins and ochratoxin A in spices other than chili pepper and nutmeg will bring positive impact on safe food trade worldwide.

Additionally, the existing data (i.e., reported as ND and low rejection rates) may need to be further examined for the origin of the samples and the sampling location (e.g., drawn from trading distribution and not necessarily considering either point of origin or point of sale/retail market). Also, if it is truly not a significant concern (i.e., reported as ND and low rejection rates), adopting an ML will not impair industry and trade. IFT believes that further safeguarding public health is worth the extra effort to put them in place versus not having any ML's.