

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 7, 11, 17

CRD19

ORIGINAL LANGUAGE

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

13th Session
Yogyakarta, Indonesia, 29 April – 3 May 2019

Comments of Thailand

AGENDA ITEM 7 - DRAFT CODE OF PRACTICE FOR THE REDUCTION OF 3-MCPDES AND GES IN REFINED OILS AND FOOD PRODUCTS MADE WITH REFINED OILS

Thailand would like to sincerely thank the eWG led by the United States of America, Malaysia and the European Union for their work in preparing draft COP. Thailand wishes to provide the following specific comments for consideration.

Specific comments

Recommended Practices Based on Good Agricultural Practices (GAP) and Good Manufacturing Practices (GMP): Obviously, there are only recommended practices for vegetable oil in this section; however, Thailand would also like to seek recommended practices for decreasing 3-MCPDE and GE on raw material handling until the step of fish oil refining. Thailand suggests adding their practices in the section if there is available information.

Paragraph 22: Thailand proposes deleting this paragraph as there are limited varieties of low lipase palm oil as well as its sources and distributors.

Paragraph 23: Thailand would like to make it clear that the “oil seeds” stated in this paragraph mean either seeds for planting or seeds for milling. If oil seeds represent seeds for planting, Thailand is of the view that keeping seeds in cool temperature is not related to the decrease in 3-MCPDE and GE, and is not practical for tropical climate countries.

Paragraph 28: Thailand proposes deleting the words [or water/alcohol (ethanol) mixtures]. In view of washing crude vegetable oil with free-chlorine water, it is an appropriate and good practice. Hence, using ethanol or water/alcohol mixtures is not necessary and cost-consuming.

Paragraph 30: For assessment of precursors, Thailand suggests adding other compounds relating to the occurrence of precursors such as FFA. In practice, most manufacturers assess FFA as an indicator of oil quality. Moreover, the method of analysis is very simple and timesaving.

Paragraph 35: Increasing the amount of bleaching clay will affect the cost of clay and oil. Therefore, Thailand suggests deleting this paragraph.

Paragraph 37: Thailand proposes deleting this sentence “For example, it has been suggested to conduct deodorization at 190-230 °C for vegetable oils and less than 190°C for fish oils.” because the specific temperature will limit the practice and may result in inappropriate quality of such oils.

Paragraph 47: Thailand proposes deleting this paragraph because the recommendation to decrease 3-MCPDE and GE by reducing the amount of refined edible oils in finished product is not a reasonable practice. Moreover, this recommendation makes it difficult to change the formulation in the finished product.

AGENDA ITEM 11- ESTABLISHMENT OF NEW MLS FOR LEAD IN COMMODITIES ACCORDING TO A PRIORITIZATION APPROACH

Thailand would like to thank the eWG led by Brazil for analyzing data as well as preparing the discussion paper.

According to occurrence data of lead concentration as indicated in Table A2 of CX/CF 19/13/9, it shows that the mean of lead contamination in algae and seaweeds is moderately high compared with other food categories. Consequently, the percentage of the contribution of algae and seaweeds to the reference values to decrease the IQ point in children (Table A3 of CX/CF 19/13/9) is 19.1% in cluster diet G10, where it

is considered as a high impact of lead exposure leading to an intake more than 10% of the tolerable intake in one of the GEMS/Food Consumption Cluster Diets. Although this category does not have consumption data in the GEMS/Food Cluster Diets database, children that is the more susceptible group consume this category as snacks. Thailand is of the view that the category of "algae and seaweeds" should elevate to a high priority. Hence, Thailand agrees with the recommendation of the eWG to consider individual countries' consumption data for food categories that have high occurrence levels as the approach to prioritize the food category to establish the MLs for lead.

AGENDA ITEM 17-ESTABLISHMENT OF MLS FOR TOTAL AFLATOXINS IN CEREALS (WHEAT, MAIZE, SORGHUM AND RICE), FLOUR AND CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN

Thailand wishes to express its appreciation to the eWG led by Brazil on the discussion paper as well as take this appropriate opportunity to assert comments on this issue.

Thailand realizes that the occurrence data of aflatoxin in cereals and cereal products (Table 1 of Appendix II of CX/CF 19/13/9) used to estimate the aflatoxin exposure fall heavily on few regions where most data are mainly obtained from 3 countries, namely, the European Union, Canada and Singapore. Considering the data especially husked rice and polished rice, it illustrates that the 95th percentile is lower than the mean. When using the mean with outliers for estimation, this makes the exposure for aflatoxin very high in rice; thus, the result and conclusion may not be correct. However, Thailand does not oppose the proposal of new work on the establishment of MLs for total aflatoxins in the category of cereal listed as follows:

- 1) Maize grain, destined for further processing
- 2) Semolina and flakes derived from maize
- 3) Husked rice
- 4) Polished rice
- 5) Wheat grain, destined for further processing
- 6) Semolina and flakes derived from wheat, excluding whole wheat flour
- 7) Cereal-based Food for infants and young children

More importantly, Thailand is of the view that the proposed MLs for aflatoxin in each food category are premature at this stage since the proposed MLs should take into account the data with adjusted outliers for calculating the exposure.

For the new work for establishment of ML of aflatoxin for rice flour, Thailand does not agree with this recommendation as the estimation shows low impact of exposure.

For the new work for establishment of ML of aflatoxin for sorghum, Thailand agrees to include sorghum in the food categories selected for the new work. This is because the evaluation of JECFA shows that the dietary exposure of aflatoxins for sorghum contributed 16-59% in 6 GEMS/Food clusters, which meets the criteria ML established as a significant contributor to total dietary exposure for consumer as food categories for consumer.