

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 14

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

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MYCOTOXINS CONTAMINATION IN CASSAVA AND CASSAVA-BASED PRODUCTS

Comments in reply to CL 2020/51/OCS-CF:

Request for comments on future work on a

code of practice for mycotoxins contamination in cassava and cassava-based products

Australia, Chile, Colombia, Egypt, European Union (EU), Thailand, Uganda, United States of America (USA)
and the International Union of Food Science and Technology (IUFoST)

GENERAL AND SPECIFIC COMMENTS

Member / Observer	Comments
Australia	<p>The Circular Letter requests the following:</p> <p>5. Codex members and observers are invited to submit comments on the development of a Code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products as follows:</p> <ol style="list-style-type: none"> a. Whether there is a need to develop a code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava products, if so, b. Whether it is feasible to develop such a COP based on the management practices available to date, if so, c. Whether there is room for the EWG to further develop the discussion paper, and if so, d. Provide information on good management practices currently available that are proven to be effective and applicable worldwide to control mycotoxin contamination in cassava and cassava-based products to supplement the information provided in Appendix I to CX/CF 20/14/12. <p>Such considerations may be: Identification of key points to consider for the development of the COP (e.g. scope and relevant mycotoxins based on management practices available); key Codex texts that should be referenced to complement the application of the this COP; any other key points Codex members / observers consider relevant for the development of the COP.</p> <p>Response to 5.</p> <p>As far as we are aware, Australia does not grow or export cassava and cassava products but instead imports it and/or for further processing.</p> <ul style="list-style-type: none"> • Although the Australia New Zealand Food Standards Code includes maximum levels for HCN, it does not include maximum levels for mycotoxins (including aflatoxin and ochratoxin) in cassava and cassava products. • For these reasons Australia does not have further comments to add other than identification of good manufacturing practices may assist in developing a Code of Practice for risk management purposes, in preference on establishing maximum limits.
Chile	<p>Chile has reviewed the recommendations made in this circular letter and its comments are as follows:</p> <ul style="list-style-type: none"> • Chile supports the development of a code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products. • Chile agrees with the recommendation made by the EWG and supports awaiting the availability of more data and information to reassess the need and viability of setting a maximum level for hydrocyanic acid (HCN) in cassava and cassava-based products.
Colombia	<p>With regard to the work in relation to mycotoxin contamination in cassava and cassava-based products, Colombia reports that after reviewing its data and that of the industry, it has no comments on this circular letter and therefore has no objections to this project.</p>
Egypt	<p>Egypt supports the development of the Code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products.</p>
European Union	<p>Mixed Competence Member States Vote</p> <p>COMMENTS ON THE CONSIDERATIONS OUTLINED IN § 5 OF THE DOCUMENT</p> <ol style="list-style-type: none"> a) The EU and its Member States (EUMS) are of the opinion that it is appropriate to develop a code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava products. b) The EUMS are of the opinion that it is feasible to develop a Code of Practice based on the practices available to date, taking into account the information available on recommended practices applicable to pre-planting stage, to planting and pre-harvest stage, to harvest stage and post-harvest stages (§2 - §33 of CX/CF 20/14/12). If needed, the Code of Practice could be updated in a few years' time if new information on management practices becomes available in the meantime.

	<p>c) The EUMS are of the opinion that there is no need to further develop the discussion paper as regards the management practices to prevent and reduce presence of mycotoxins in cassava and cassava products and that the work on the elaboration of the code of Practice can be initiated.</p> <p>d) The EU region lacks experience as cassava is not grown in the EU and we can therefore unfortunately not provide information on good management practices.</p> <p>e) It is the understanding of the EUMS that the scope of the code of practice relates to the prevention and reduction of in particular aflatoxins and ochratoxin A in cassava and cassava products. This should be clarified in the scope of the code of practice in case the title of the code refers still to mycotoxins in general.</p>
Thailand	<p>Thailand wishes to provide the following specific comments for consideration.</p> <p>Mycotoxin contamination in cassava and cassava products</p> <p>Thailand supports the development of a Code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products due to the available sufficient data provided in the discussion paper.</p> <p>Levels of HCN in cassava and casava products</p> <p>Thailand agrees to await availability of further sufficient data and information. In addition, we are of the view that the data collection on types of cassava and cassava-products that shows the risk of HCN contamination which significantly affects to human health should be addressed.</p>
Uganda	<p>a) YES, Uganda agrees that there is need to develop a code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava products.</p> <p><u>Justification:</u></p> <ul style="list-style-type: none"> • Uganda is a major producer of cassava crop and has high levels of casava products industrialization and consumption rate. However, there are safety and quality issues with cassava hindering its trade thus need for development of a code of practice to manage the practices that could lead to cassava and cassava products contamination. • Availability of data for mycotoxin contamination for mishandled cassava and cassava products. • Cassava products are used as components/ raw materials in composite flours and other foods for vulnerable groups, thus its contamination can affect the final product safety hence compromising the consumer health and safety. • Cassava and cassava products are also affected by other contaminants which cause toxicological adverse effects thus need for a code of practice to prevent any form of contamination in the product. • Existence of a large national and international market for food, animal feeds and industrial products for cassava in case it is of good quality. <p>b) Uganda agrees, it is feasible to develop a COP for cassava and cassava products at pre and post-harvest handling stage.</p> <p><u>Justification:</u></p> <p>Existence of comparison data for cassava and cassava products with mycotoxin contamination when a good Code of management practices is followed and when the COP is uncomplished with.</p> <p>c) YES. To include particular issues that are of concern to Uganda</p>
USA	<p>The United States appreciates the opportunity to provide comments in response to CL 2020/51/OCS-CF, which requests input on (a) whether there is a need to develop a code of practice (COP) for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products, if so, (b) whether it is feasible develop such a code of practice based on the management practices available to date, if so, (c) whether there is room for the electronic working group (EWG) to further the discussion paper, and if so, (d) provide information on good management practices currently available that are proven to be effective and applicable worldwide to control mycotoxin contamination in cassava and cassava-based products to supplement the information provided in Appendix I to CX/CF 20/24/12.</p> <ul style="list-style-type: none"> • The United States supports development of a COP for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products because of the importance of cassava as a food crop and the health concerns posed by mycotoxins.

	<ul style="list-style-type: none"> • The United States, however, does not believe sufficient information was provided in the discussion paper (CX/CF 20/14/12) on the mitigation practices for mycotoxins that are currently available and proven to be effective for developing a COP. <ul style="list-style-type: none"> ○ The United States believes more information on currently available mitigation practices that are proven to be effective specifically for aflatoxins and ochratoxin A (OTA) in cassava is needed for developing a COP. The report of CCCF13 (REP 19/CF, paragraph 141) stated, “It would be helpful to target on reduction and prevention of aflatoxins and OTA, which could be beneficial for the reduction of other mycotoxins in cassava and cassava fermented products.” • The United States also believes it is important to identify the different types of cassava-based products (e.g., fufu vs gari) that are more susceptible to mycotoxin contamination than others for focusing mitigation practices in a COP. <p>In summary, the United States recommends the EWG continue further development of the discussion paper that will provide more information on currently available mitigation practices that are proven to be effective, especially for aflatoxins and OTA, that is sufficient for proposing new work on developing a COP at CCCF14 in May 2021.</p>
<p>IUFOST</p>	<p>IUFOST strongly supports work on a code of practice for controlling or eliminating mycotoxins in cassava and cassava products. Cassava and cassava products are important foods and feed ingredients in many tropical countries, and the possibility of contamination with several different mycotoxins at significant levels is great. Better crop and food handling is needed and a COP will be helpful to all concerned with cassava production and utilization.</p>