CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 8

CX/CF 23/16/8-Add.1
March 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)

MAXIMUM LEVEL FOR TOTAL AFLATOXINS IN READY-TO-EAT PEANUTS AND ASSOCIATED SAMPLING PLAN (AT STEP 4)

Comments in reply to CL 2023/23-CF
submitted by
Canada, Chile, Kenya, Peru, Singapore, United States of America (USA)
and American Herbal Products Association (AHPA)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/23-CF[1] issued in February 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections. For this CL only general comments have been requested.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby annexed and presented in tabulated format.

[1] https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/
https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCCF

Annex

GENERAL COMMENTS

COMMENT	MEMBER/ OBSERVER
At this time, all available Canadian occurrence data for "Ready-to-Eat" (RTE) peanuts have been uploaded to the GEMS/Food Database. There are a few additional samples that are expected to become available later this year that, once received, will also be submitted to the database. We would further clarify that all peanut data submitted by Canada represent RTE peanuts purchased at consumer-facing grocery stores (none are destined for further processing or for use as an ingredient in commercial products). Canada is supportive of India re-submitting their 8802 samples of aflatoxins in RTE peanuts to the GEMS/Food Database. Canada agrees with re-examining the 102 data points with LODs above 4 µg/kg, particularly if there are positive samples (i.e. quantified values) that were previously inadvertently excluded. The text for this recommendation states "below 4 µg/kg" but should instead indicate "above 4 µg/kg." Canada supports the proposal to present a discussion paper at CCCF17 (2024) on a Maximum Level for Total Aflatoxins in RTE Peanuts and Associated Sampling Plan. We would further suggest, for consideration, that this agenda item could be combined with work to review the existing ML for aflatoxins in peanuts for further processing (FFP), which has been flagged in the Codex Standard Review (in List A.2 Established or reviewed ≥15 and <25 years ago (between 1998 and 2007) and Overall Highest Priority List for Re-Evaluation of Codex Standards and Related Texts for Contaminants in Food). Elaborating MLs for both RTE and DFP peanuts at the same time would help in the development of reasonable, achievable and science-based ML values for peanuts in different stages of processing. It would also help ensure any MLs developed are consistent with each other and take into account the impacts of processing on contaminant concentrations (e.g. presumably the ML for RTE peanuts would be lower relative to the ML for DFP peanuts).	**Canada**
Chile agradece la oportunidad de presentar observaciones sobre las recomendaciones para un nivel máximo para el total de aflatoxinas en el maní (cacahuete) listo para el consumo y plan de muestreo asociado. Al respecto, y considerando los argumentos entregados en el documento CX/CF 23/16/8, Chile quisiera comentar lo siguiente: - Chile está de acuerdo con que la India pueda volver a presentar los 8802 datos sobre la presencia de aflatoxinas en el maní (cacahuete), en el entendido que los datos mal ingresados serán eliminados de la plataforma. - Chile está de acuerdo con volverán a examinar los 102 puntos de datos relacionados con el límite de detección inferior a 4 µg/kg.	**Chile**
Kenya appreciates the work done by the EWG chaired by India and co-chaired by Senegal and takes note of the recommendations.	**Kenya**
El Perú desea agradecer a la Secretaría de la Comisión del Codex Alimentarius, Programa Conjunto FAO/OMS sobre Normas Alimentarias, respecto a la solicitud de observaciones sobre las recomendaciones para un nivel máximo para el total de aflatoxinas en el maní (cacahuete) listo para el consumo y plan de muestreo asociado. En esta ocasión, consideramos la siguiente observación: - Que el Grupo de trabajo por medios electrónicos presente un documento en la 17.ª reunión del CCCF (2024) teniendo en cuenta los datos sobre la presencia de aflatoxinas en el maní (cacahuete) listo para el consumo desglosados por país/región geográfica proporcionados por el administrador de SIMUVIMA/Alimentos de la OMS	**Peru**

COMMENT	MEMBER/ OBSERVER
Singapore supports the recommendations and will continue to support the work by submitting occurrence data to GEMS/Food, noting the need to distinguish RTE peanuts from peanuts for further processing.	**Singapore**
• The United States supports ongoing submission of new or corrected data to GEMS/Food. If work continues, it should include the most recent and accurate data available. • The United States requests, for any further work, that the EWG follow the recommendations in Paragraph 177 of REP22_CF15: that EWG members should be consulted on data review, on what should be considered RTE, and on which data should be considered in the data analysis; also, that there should be at least two rounds of comments in the EWG on the Codex Forum. • The United States suggests that any further work be considered at CCCF18 (2025) or CCCF19 (2026) instead of CCCF17 (2024) to allow adequate time for member countries to collect new occurrence data on AFT in RTE Peanuts with geographical representation and to submit the data to GEMS/Food. The EWG could prepare a discussion paper for CCCF17 that discusses the definition of RTE peanuts and what data should be considered in the data analysis for CCCF18 or CCCF19.	**USA**
AHPA encourages the addition of a statement in all documents relevant to total aflatoxin limits, placed as appropriate, to clarify that total aflatoxin (AFT) is operationalized as the sum of AFB1, AFB2, AFG1 and AFG2.	**AHPA**