



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Seventh Session

Moscow, Russian Federation, 8 – 12 April 2013

PROPOSED DRAFT MAXIMUM LEVELS FOR HYDROCYANIC ACID IN CASSAVA AND CASSAVA PRODUCTS

Comments at Step 3 submitted by Costa Rica, European Union, Ghana, India, Kenya, Philippines, Russian Federation and African Union

COSTA RICA

Costa Rica welcomes the opportunity to provide comments on document CX/CF13/7/10 Proposed Draft Maximum Levels for Hydrocyanic Acid in Cassava and Cassava Products.

Comment:

Costa Rica does not have comments on the document. It agrees with the conclusion of the working group that the development of maximum levels for hydrocyanic acid in cassava and cassava products is not currently justified.

We would support the development of a code of practice that would lead to a reduction in exposure to HCA as a good risk management measure.

EUROPEAN UNION

The European Union (EU) welcomes and appreciates the good work performed by the electronic Working Group under the lead of Australia, co-chaired by Nigeria on the elaboration of draft maximum levels for hydrocyanic acid in cassava and cassava products.

The EU agrees with the conclusions and wishes to make the following comments on the recommendations:

- The EU is of the opinion that it is necessary to use a common approach for expressing MLs related to hydrocyanic acid generated from naturally occurring cyanogenic glycosides. The EU is in favour of amending the ML for gari to express it in terms of total hydrocyanic acid, by converting the current ML of 2 mg/kg of free hydrocyanic acid into a value reflecting the total hydrocyanic acid.
- The EU stresses the importance of a suitable analytical technique whereby the total hydrocyanic acid is determined by converting all contributing compounds to hydrocyanic acid (acid or enzymatic hydrolysis). The EU therefore encourages further validation work for the used analytical methods to measure total hydrocyanic acid.
- The EU is of the opinion that it would be appropriate to integrate the maximum levels of hydrocyanic acid established in commodity Codex standards for sweet cassava (CODEX STAN 238-2003), for edible cassava flour (CODEX STAN 176-1989) and for gari (CODEX STAN 151-1989) in the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995).

GHANA

Comment: Ghana does not support the proposal to amend the existing MLs for:

- Sweet Cassava < 50mg/kg;
- Edible cassava flour, not more than 10mg/kg and
- Gari, not more than 2mg/kg, expressed as free HCN

We support the recommendation that the development and implementation of a Code of Practice should be prioritised. Additionally, further data should be collected after the Code of Practice is put in place and its effectiveness should be evaluated before consideration is given to setting new MLs.

Rationale: Using the current Codex standards for cassava flour, there are no available estimates of dietary exposure that exceed the ARfD (for cyanide equivalents derived from cyanogenic glycosides of 0.9 mg/kg body weight (equivalent to 0.09 mg/kg body weight as cyanide) or PMTDI (PMTDI of 0.02 mg/kg bw cyanide (JECFA, 2012). There is therefore no justification to review the existing MLs at this stage.

INDIA

India support the recommendation of eWG for developing and implementing code of practice to reduce HCN at this stage as without sufficient data on concentrations of HCN in Cassava and Cassava based products, effects of processing and consumption pattern, rushing for MLs may not be a scientific approach and may not be practically feasible also.

KENYA**COMMENT:**

For ready to eat product we can maintain **10mg/kg** and for raw cassava sweet we accept **<50mg/kg levels** which are recommended by WHO and FAO for safety purposes.

PHILIPPINES

The Philippines, as a member of the EWG led by Australia, concurs with the recommendations of the EWG on the following specific issues:

1. Prioritize the development and implementation of a Code of Practice and collect further data before consideration is given to setting new MLs;
2. Encourage countries to collect data on concentrations of total HCN in cassava and cassava-based products, methods of preparation and consumption; and
3. Collect analytical methods used for HCN in Codex member countries and requests CCMAS to adopt proposed methods. A variety of fit-for-purpose analytical methods may be used to determine levels for total HCN in cassava and cassava-products until a validated analytical method to measure total HCN is established.

RUSSIAN FEDERATION**Position:**

We consider it is possible to agree with proposed draft MLs for hydrocyanic acid in cassava flour – 10 mg/kg and cassava products – 2 mg/kg.

However, we consider it is necessary to apply measures (approaches) proposed in document CX/CF 13/7/11 to household activities as well. We consider as appropriate the elaboration of national program of educating population on prevention and reduction of the level of hydrocyanic acid in cassava and cassava products.

We consider the proposed HPLC analytical method of determination of hydrocyanic acid derived from cassava cyanogenic glycosides as specific and having satisfactory limit of quantification. It would be reasonable to specify the detection limit of TLC screening method as well.

AFRICAN UNION

<p>African Union supports the recommendation that there is no justification for amending the existing MLs (For Sweet Cassava < 50mg/kg; edible cassava flour, not more than 10mg/kg and gari, not more than 2mg/kg, expressed as free HCN).</p> <p>We further support the recommendation that at this stage, priority should be given to the development of a Code of Practice.</p>	<p>Using the current Codex standards for cassava flour, there are no available estimates of dietary exposure that exceed the ARfD (for cyanide equivalents derived from cyanogenic glycosides of 0.9 mg/kg body weight (equivalent to 0.09 mg/kg body weight as cyanide) or PMTDI (PMTDI of 0.02 mg/kg bw cyanide (JECFA, 2012), there is therefore no need to amend the current ML.</p>
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