



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

**9<sup>th</sup> Session**

**New Delhi, India, 16 – 20 March 2015**

**PROPOSED DRAFT MAXIMUM LEVEL FOR TOTAL AFLATOXINS IN READY-TO-EAT PEANUTS AND  
ASSOCIATE SAMPLING PLAN**

**(Prepared by the Electronic Working Group led by India)**

*Comments submitted by Chile, Egypt, El Salvador, Ghana, Nicaragua, Thailand, USA and AU*

**CHILE**

Chile reviewed the document and accepts the recommendations in it, in particular the maximum level of 10 µg/kg for total AFs in peanuts RTE proposed in paragraph 5.

**EGYPT**

Egypt supports the low level to protect the health of consumers, so we propose the following maximum levels:  
- 2 µg/kg ML<sub>s</sub> of B<sub>1</sub> in ready-to-eat peanuts and 4 µg/kg ML<sub>s</sub> of total aflatoxins in ready-to-eat peanuts.

**EL SALVADOR**

El Salvador supports the adoption of the draft maximum level (ML) of 10 µg/kg for total aflatoxins in ready to eat peanuts, since it is in line with the MLs for aflatoxins in tree nuts of CODEX STAN 193-1995, which allows trade in ready to eat peanuts and provides opportunity to collect data that confirm the adoption of the ML for aflatoxins in ready to eat peanuts by the Codex Committee on Contaminants in Foods.

**GHANA**

**COMMENT**

Ghana supports setting the ML of 10 µg/kg for total aflatoxins in RTE peanuts. We also support the call for an exposure assessment of health impact based on proposed MLs by JECFA

**RATIONALE**

Majority of countries have enacted MLs for AFB<sub>1</sub>, total AF or both. However, these levels are not harmonized and an extremely wide range exists (for total AF between 4 µg/kg in the EU to 30 µg/kg in India). Codex has set an ML of 15 µg/kg for peanuts for further processing. There is considerable risk assessment data that demonstrates that removing heavily contaminated batches gives rise to maximum risk reduction. By comparison, MLs of 10 µg/kg or 20 µg/kg produce limited difference in liver cancer risk.

The acceptance of new MLs by Codex will require acceptance of a sampling plan specifically addressing the final ML agreed by consensus. In addition, trade in pre-packaged RTE peanuts will need to be accommodated.

**NICARAGUA**

Nicaragua appreciates the work accomplished by India in the electronic working group (EWG) of review of the conclusions and recommendations in the document, and we propose:

We support the work of the EWG concerning a ML for total AF (B<sub>1</sub>+B<sub>2</sub>+G<sub>1</sub>+G<sub>2</sub>) of 10µg/kg, as long as the ML for AFB<sub>1</sub> will be smaller or equal to 6 µg/kg.

Considering that there is no defined sampling method for the ready to consume product and the one the working group recommends would represent high costs for the industry owing to added value, it would be convenient to undertake a representative sampling of the raw materials before processing the product, taking into consideration Codex guidelines.

Once there is a final product ready for the consumer, there has to be a random control by lot to ensure quality and safety.

Ask the Codex Committee on Methods of Analysis and Sampling to propose a sampling procedure for consumption in its different presentations.

**THAILAND**

Thailand appreciates work of the electronic-working group led by India to prepare a proposal for MLs for total aflatoxins in ready-to-eat peanuts.

However, we believe that before the separated ML for “ready-to-eat peanuts” can be agreed, there should be a clearer definition of “ready-to-eat peanuts” to be clearly distinguish from “peanuts destined for further processing”. While the definition amended by the 8<sup>th</sup> Session of CCCF for “ready-to-eat” means “not intended to undergo an additional processing/treatment that has proven to reduce levels of aflatoxins before being used as ingredient in foodstuffs, otherwise processed or offered for human consumption”, the description of ready-to-eat peanuts in the project document can include raw shelled peanuts and raw in-shell peanuts. These peanuts are physically difficult to be identified as “ready-to-eat” or “destined for further processing”. The only way to distinguish between these 2 types of peanuts is to have them identified by the trading partners. We would suggest that raw peanuts going to international trade should be identified clearly as “destined for further processing” or “ready-to-eat”

For proposed MLs, we suggest that more occurrence data should be collected through GEMS/Foods for further consideration.

**USA**

- The U.S. believes the document does not provide adequate evidence to support establishing an aflatoxin ML for ready-to-eat (RTE) peanuts that would be more protective of consumer health compared to the existing ML for peanuts for further processing. As noted in para 4 under “Recommendations,” the eWG recommends that CCCF consider requesting JECFA to perform an exposure assessment for health impact based on proposed MLs for total aflatoxins in RTE peanuts.
- The U.S. believes data presented in the document do not show any meaningful difference from a food safety perspective, for example, between a standard of 20µg/kg and standards at lower levels. Part of the recommendation of a ML of 10µg/kg appears to be a desire to be consistent with the ML for tree nuts.
- The U.S. believes that, prior to progress on this agenda item, it is important for JECFA to conduct an update of its previous risk assessments, and it should include a specific focus on aflatoxin dietary exposure from RTE peanuts. We note that an update of the risk assessment for aflatoxins is on the JECFA priority list.
- The U.S. believes that, until JECFA has completed the risk assessment, as noted above, adoption of a draft ML for total aflatoxins in RTE peanuts is premature.
- The U.S. provides the following comments on paras 1 and 2 in Appendix I of the document:
  - We are not aware of any term or definition for RTE peanuts in the GSCTFF.
  - Para 2: We do not agree that raw in-shell and shelled peanuts are RTE peanuts.
  - To be consistent with the definition for RTE tree-nuts and RTE dried figs in the GSCTFF, we recommend the following definition for RTE peanuts: “peanuts, which are not intended to undergo an additional processing/treatment that has proven to reduce levels of aflatoxins.”

**AFRICAN UNION**

<b>RECOMMENDED AFRICAN POSITION</b>	<b>RATIONALE</b>
<p><b>AU supports the ML of 10 µg/kg for total aflatoxins in RTE peanuts.</b></p> <p><b>AU supports the call for an exposure assessment of health impact based on proposed MLs by JECFA.</b></p>	<p>AU supports the work on developing a harmonized ML for total aflatoxin in ready-to-eat (RTE) peanuts (groundnuts).</p> <p>The control and management of AF in peanuts is an important health concern. Consequently, the majority of countries have enacted MLs for AFB1, total AF or both. However, these levels are not harmonized and an extremely wide range exists (for total AF between 4 µg/kg in the EU to 30 µg/kg in India). Codex has set a ML of 15 µg/kg for peanuts for further processing. The wide range of MLs is disruptive of trade and a harmonized ML would be advantageous.</p> <p>The setting of an appropriate ML is of considerable importance to African countries, especially those currently exporting to markets with extremely low MLs, such as the EU. A number of African countries have either ceased to export or struggle to obtain entry into these markets.</p> <p>There is considerable risk assessment data that demonstrates the need to set MLs for AF and that demonstrates that removing heavily contaminated batches gives rise to the maximum risk reduction. By comparison, MLs of 10 µg/kg or 20 µg/kg produce limited difference in liver cancer risk.</p> <p>The proposed ML of 10 µg/kg for total AF is aligned with the Codex ML of 15 µg/kg already agreed for total AF in peanuts for further processing. Furthermore, it aligns with current MLs for total AF set in a number of African countries (Egypt, Mauritius, Mozambique, South Africa, Sudan, Tanzania and Uganda).</p>
<p>AU also agrees with the EWG's recommendation that existing Codex methods of sampling &amp; analysis (for unprocessed peanuts) currently being practiced may continue for the time being even for RTE peanuts, however, there would be a need for more work on appropriate sampling plan specific for total aflatoxin in RTE peanuts. This is particularly pertinent for RTE peanuts traded in packs.</p>	<p>The acceptance of new MLs by Codex will require acceptance of a sampling plan specifically addressing the final ML agreed by consensus. In addition, trade in pre-packaged RTE peanuts will need to be accommodated.</p>