

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5-12, 15

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

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Comments of Thailand

Agenda Item 5: CX/CF 22/15/5

Thailand would like to submit comments to the proposed ML for cadmium in cocoa powder category (100% total cocoa solids on a dry matter basis) ready for consumption as follows:

Thailand supports the ML range of 2.0-3.0 mg/kg since the lower ML of 2.0 mg/kg would potentially affect the rejection rate of Latin America region. While the ML of 3.0 mg/kg is very high, it represents a relatively small intake reduction.

Agenda Item 6: CX/CF 22/15/6

Thailand would like to sincerely thank the EWG chaired by Peru and co-chaired by Ecuador and Ghana for their work in preparing draft Code of Practice (COP) for the prevention and reduction of cadmium contamination in cocoa beans. Thailand wishes to provide the following comments for consideration.

Specific Comments

Paras 11 & 23:

Thailand is of the view that the practices still emphasise soil analysis, whether physical or chemical examination. In practice, soil analysis is necessary when the assessment demonstrates a risk of excessive Cd in the area. Furthermore, the practice too focuses on the method of soil analysis and the performance of the laboratory and its efficiency in the analysis, such as accredited laboratories, validated methods and certified reference materials. All of the aforementioned laboratory performances, Thailand believes they would be appropriate for food analysis rather than soil.

Para 18:

Thailand would like to seek clarification on the planting area's recommendation **to be located far from the road** which may reduce the exposure of cadmium from engine combustion. Thailand has an opinion that the combustion engines, e.g. in vehicles can lead to emissions of heavy metal content like Lead. Thailand would like to ask for supported studies to ensure that Cd could contaminate the area specified in this paragraph.

Para 46:

Thailand has an opinion that the recommended mucilage draining time should be clearly defined as the time when the concentration of Cd can be reduced without affecting the organoleptic qualities of cocoa. However, if the period of mucilage draining is not a significant factor in reducing the level of Cd in cocoa, it is not necessary to prescribe.

Agenda Item 7: CX/CF 22/15/7

Thailand wishes to express its appreciation to the EWG chaired by Brazil on the establishment of MLs for lead in certain food categories as well as take this appropriate opportunity to assert comments on this issue.

Eggs (fresh eggs (chicken and ducks)): Thailand does not oppose the proposed ML of 0.25 mg/kg for chicken eggs and duck eggs.

Culinary herbs (fresh) (except Rosemary): Thailand believes that the ML for culinary herbs (fresh) should be set at 0.3 mg/kg, the same as for leafy vegetables. Because of the practical difficulties for competent authorities in determining the significance of overlapping fresh herbs and leafy vegetables.

Rosemary (fresh): Due to an appropriate sample rejection, Thailand does not oppose the proposed ML of 0.5 mg/kg.

Culinary herbs (dried): According to the principal, the proposed ML shows a higher rejection rate (5%) and it is a food category with a low dietary consumption. As a result, Thailand recommends an ML of 2.5 mg/kg, with an appropriate rejection rate of 2.8%.

Dried spices - Aril: Thailand does not oppose if no proposal for ML for aril is made due to a lack of data to analyze in order to set up the ML.

Dried spices - Floral parts (cloves, excluding saffron): Thailand has no objections to the proposed ML of 2.5 mg/kg for cloves because its rejection rate is less than 5%. However, Thailand believes that the ML should be established for saffron so that it can be used as a criterion for trade inspection. In particular, the proposed ML for saffron might analyze its data or combine saffron and cloves data.

Dried spices - Fruits and berries spices (excluding star anise and sumac): Thailand agrees that the proposed ML of 0.8 mg/kg is appropriate for fruits and berries spices. Thailand also does not oppose the recommendation if no ML for sumac is established due to a lack of data. Thailand, on the other hand, proposes that the ML for star anise be determined because there is sufficient data (n=83), and so the ML for star anise be set at a level greater than 0.8 mg/kg, such as 1.0 mg/kg.

Dried spices - Garlic: Thailand does not object to the proposed ML of 0.4 mg/kg, which represents a rejection rate of 2.38%.

Dried spices - Bark: Thailand has no objections to the proposed ML of 2.5 mg/kg, which has a rejection rate of 4.7%.

Dried spices - Seeds spices (excluding, carom, celery, dill, mahlab, mustard and poppy): Thailand does not oppose the proposed ML of 0.8 mg/kg, which has a rejection rate of 2.0%.

Dried spices - Celery seeds: Thailand is not opposed to the proposed ML of 1.5 mg/kg, which has a rejection rate of 4.2%.

Sugar, white and refined: Thailand has no objections to the proposed ML of 0.1 mg/kg for Lead in white and refined sugar.

Sugar, brown and raw: Thailand could not agree on an ML of 0.1 mg/kg, which is the same as the ML for white and refined sugar. Thailand believes that raw sugar, which is a high-value commodity in international trade, requires further processing before consumption. As a result, raw sugar is likely to contain more lead than white or refined sugar. Hence, Thailand suggests that a higher ML level of 0.1 mg/kg, such as 0.2 mg/kg or 0.15 mg/kg be set.

Honey: Thailand would like to suggest using a higher ML than 0.06 mg/kg, such as 0.1 mg/kg, because it has a low rejection rate (1.8%) and no significant difference in intake reduction.

Corn and maple syrups: Thailand has no objections to the proposed ML of 0.1 mg/kg, based on a rejection rate of 2.99%.

Sugar-based candies: Thailand suggests that a single ML for hard candies and soft sweets be set at 0.07 mg/kg for both due to a lack of clarity in the hard and soft candy product descriptions.

Cereal-based products for infant and young children, expressed "as is": Thailand does not oppose the proposed ML of 0.05 mg/kg.

Ready-to-eat meal for infant and young children: Thailand does not oppose the proposed ML of 0.05 mg/kg.

Agenda Item 8: CX/CF 22/15/8

Thailand wishes to express its appreciation to the EWG chaired by New Zealand and co-chaired by Canada on the establishment of ML for methylmercury in certain fish species as well as take this appropriate opportunity to assert comments on this issue.

Orange roughy: Thailand supports the proposed ML of 0.8 mg/kg for methylmercury in orange roughy, stating that the rejection rate is less than 5% (both in methylmercury contamination data and modelled dataset).

Pink cusk-eel: Thailand does not oppose the proposed ML of 1.0 mg/kg for methylmercury in pink cusk-eel.

Sampling plan: Thailand notes the progress further development of the sampling plan and supports the EWG continues to work on the sampling plan.

Agenda Item 9: CX/CF 22/15/9

Thailand would like to thank the EWG chaired by Brazil and co-chaired by India for preparing the establishment of ML for total aflatoxins in certain cereals and cereal-based products. Thailand would like to submit our comments as follows:

Maize grain, destined for further processing: Thailand has no objections to the proposed ML of 30 µg/kg, which demonstrates a reasonable rejection rate.

Flour, meal, semolina and flakes derived from maize: Thailand has no objections to the proposed ML of 20 µg/kg, which has a reasonable rejection rate consistent with the proposed ML of 30 µg/kg for maize grain destined for further processing. In general, the ML of a processed product is lower than that of raw materials such as cereals.

Husked rice: Thailand has no objections to the proposed ML of 25 µg/kg.

Polished rice: Thailand has no objections to the proposed ML of 5 µg/kg.

Sorghum grain, destined for further processing: Thailand has no objections to the proposed ML of 15 µg/kg which as an appropriate rejection rate.

Cereal-based Food for infants and young children: The proposed ML of 10 µg/kg is too high for infants and young children compared to other commodities for consumers, such as husked rice (a proposed ML of 5 µg/kg). Furthermore, the proposed ML of 10 µg/kg only reduces intake by 10.4% and has a relatively low sample rejection rate (0.14 %). As a result, to achieve a higher intake reduction, Thailand proposes a lower ML than the EWG proposal.

Sampling Plan: Thailand believes that the sampling plan should be in accordance with *CXS 193-1995*, which already has detailed information on certain commodities, such as maize. However, more information is required for other crops for which the sampling plan has not yet been set, such as rice since they are probably different from maize.

Agenda Item 10: CX/CF 22/15/10

Thailand appreciates the efforts of India in leading the EWG for preparing the proposed ML for total aflatoxins in ready-to-eat peanuts. Thailand would like to provide the following comments:

Proposed ML: Thailand is of the view that consideration should follow the principle that the ready-to-eat peanut should have a lower ML than peanut destined for further processing. Furthermore, the new data represented by EWG shows acceptable levels of 10 and 12 µg/kg since there is no significant difference in rejection rates. However, it is necessary to assess whether the country of production is feasible and whether it can be operated.

Sampling plan: Thailand does not oppose the recommendations from EWG either using the same sampling plan of peanut destined for further processing regarding *CXS 193-1995* or consulting with the CCMAS.

Agenda Item 11: CX/CF 22/15/11

Thailand would like to submit the following comments:

Proposed MLs for total aflatoxins: Thailand agrees to the proposed ML for total aflatoxins by dividing the MLs into two groups:

1) the ML for dried chilli and paprika, nutmeg, and ginger at 20 µg/kg. We note that at an ML of 20 µg/kg, nutmeg has a rejection rate of over 5%; and

2) the ML for dried pepper, and turmeric at the lower of 20 µg/kg.

Proposed MLs for ochratoxin A: Thailand agrees to the proposed ML of 20 g/kg for ochratoxin A in nutmeg, ginger, pepper, and turmeric. Furthermore, we suggest re-evaluating the statistics for dried chili and paprika. Thailand founds that rejection rates for dried chili and paprika were exceptionally high in 2018-2021 and 2011-2021, respectively, at 16.6% and 20.1%. As a result, Thailand suggests analyzing the data in order to propose an ML of greater than 20 µg/kg.

Sampling Plan: Thailand would like to suggest that the EWG continue working on the sampling plan. Thailand believes that the ISO 948 (Spices and Condiments – Sample) sampling plan is inadequate for food safety. Therefore, Thailand proposes that more data be collected in order to determine the best sampling plan for mycotoxin analysis.

Agenda Item 12: CX/CF 22/15/12

Thailand would like to thank the EWG chaired by Nigeria and co-chaired by Ghana for preparing the draft COP for prevention and reduction of mycotoxin contamination in cassava and cassava-based products. Thailand wishes to provide the following comments for consideration.

General Comments

The draft COP contains general good practices for cassava planting, but certain unclear practices in terms of how they relate to preventing and reducing mycotoxin contamination. Furthermore, some recommendations are excessively comprehensive, rendering them impracticable.

Specific Comments

Scope: To clarify the COP, this COP is for cassava and cassava-based products intended for human consumption. Therefore, Thailand suggests the following amendment: "This Code of Practice intends to provide...to prevention and reduction of mycotoxin in cassava and cassava-based products **for human consumption.**"

Section 2 – Section 5 (Recommended practices applicable to pre-planting stage, planting and pre-harvest stage, harvest stage, post-harvest stage): Some of the practices are mostly on general cassava planting information. Some practices are questionable in their ability to prevent and reduce mycotoxin, and they are also highly specific in terms of their application. As a consequence, Thailand requests that the following issues be reviewed:

- Uncertain practices in terms of how they relate to preventing and reducing mycotoxin contamination. For example, the recommendation for soil tests (para 10), the determination of the range (up to 0.75 m - 1 m) of ridges or mounds when applying organic fertilizers (para 11), and other aspects that are not related to preventing and reducing mycotoxin from fungi, such as achieving maximum yield (paras 12, 13, 15), and cost-effectiveness (para 20).
- The practices are too specific and may not be relevant to preventing and reducing mycotoxin from fungi, such as the recommendation of stem cutting length at 25 cm (para 13), fertilizer application (para 17), and the need to use predictive weather models to schedule pesticide use (para 18).
- Some recommendations include information that is not necessary, such as the A_w value (para 24).
- Some practices may be difficult to implement, such as the recommendation to begin processing cassava after harvesting (8-12 hours) (para 26), and the recommendation that determines the drying temperature of the sun and solar dryer, which may be difficult to control (para 38).

Section 8 and Section 9 (Transportation and Personnel hygiene): The practices may not be related to preventing and reducing mycotoxin from fungi. The guidelines could specifically refer to the Codex Standard, which is the *General Principles of Food Hygiene (CXC 1-1969)*.

Agenda Item 15: CX/CF 22/15/14

Thailand wishes to provide the following comments for consideration.

1. With regard to **Section F)-subsection 1)**, Thailand disagrees with the use of the phrase "...usual rejection rate of 5%," as the CCCF considers rejection rates to be between 0 and 5%. As a result, the usual rejection rate of 5% should not be interpreted. Therefore, we propose that the text be amended to "...usual rejection rate ~~of 5%~~ **in the range of 0 to 5%.**"
2. According to **Section F)**, Thailand agrees to define possible elements. In addition, Thailand proposes other key factors for rejection rate consideration as follows:
 - *Dietary consumption*, such as for commodities with high consumption, a low rejection rate will lead to high ML, which will result in food safety (thus intake reduction is important). On the other hand, commodities with low consumption, such as herbs and spices, could select a low rejection rate and accept a high ML, which has less impact on exposure.
 - *The value and volume of international commodity trading*: Suppose a commodity, such as sugar, has a high volume and value in international trade. In that case, an acceptable rejection rate of about 5% for ML establishment will significantly impact sample rejection.
 - *Distribution of geographical representative data*: If the data distribution is unbalanced, the level of rejection rate may be taken into account, since the ML trend will follow the selected rejection rate.
 - *Worldwide dataset*: When considering a global dataset with a rejection rate of less than 5%, it is occasionally necessary to evaluate a regional dataset as well, because the chosen rejection rate may impact the commodity in that region.