

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 7, 8, 9 and 10

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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)

Comments submitted by Thailand

Agenda Item 5: Maximum levels for lead in certain food categories (at Steps 4 and 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.

Soft brown and raw Sugar: Thailand supports the proposed ML of 0.15 mg/kg with an appropriate rejection rate of 3.7% and 1.3%, respectively.

Non-centrifuged sugar: Thailand has no objections to the proposed ML of 0.15 mg/kg.

Agenda Item 6: Code of Practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products (at Step 7)

Thailand would like to sincerely thank the EWG chaired by Nigeria and co-chaired by Ghana for their work in preparing draft Code of Practice (CoP) for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products. Thailand supports the CoP with clear scope, that is for cassava and cassava-based products intended for human consumption, and the practical recommended practices. Thailand agrees to forward the CoP for final adoption by Codex Alimentarius Commission.

Editorial comments: The word “within” in para. 24 are repeated.

Agenda Item 7: Sampling plans for total aflatoxins in certain cereals and cereal-based products including foods for infants and young children (At Step 4) Appendix I

Thailand appreciates the efforts of Brazil as Chair and India as co-Chair of the EWG in leading and preparing the sampling plans for analysis of total aflatoxins in certain cereals and cereal-based products including foods for infants and young children. Thailand has no objections to the proposed sampling plan for maize grain, destined for further processing with laboratory sample size of 5 kg and test portion size of 25 g because the information is very clear.

Agenda Item 8: Maximum level for total aflatoxins in ready-to-eat peanuts and associated sampling plan (at Step 4)

Thailand is of the view that if India as chair of the EWG, still shows his commitment to review and analyse ready-to-eat (RTE) peanut occurrence data for CCCF17 consideration in the next year. Thailand does not oppose to the postponement of the establishment of ML for total aflatoxins in RTE peanuts for one year.

For sampling plan, Thailand supports the development of the sampling plan for total aflatoxins in RTE peanuts which is aligned with the sampling plan for peanuts intended for further processing in CXS 193-1995.

Agenda Item 9: Maximum levels for total aflatoxins and Ochratoxin A in nutmeg, dried chili and paprika, ginger, pepper and turmeric and associated sampling plans (at Step 4)

Thailand would like to submit the following comments:

Total aflatoxins:

Thailand agrees with the proposed MLs for total aflatoxins in dried chilli and paprika, and nutmeg at 20 µg/kg with an appropriate rejection rate of 4.5% and 4.2%, respectively.

Thailand agrees that there is no need to establish the MLs for total aflatoxins in ginger, pepper and turmeric because aflatoxin contamination in these spices is not detected or very low.

Ochratoxin A:

Thailand agrees to the proposed ML of 20 µg/kg for ochratoxin A in nutmeg with a rejection rate of 4.5%.

Thailand agrees that there is no need to establish the MLs for ochratoxin A in ginger, pepper and turmeric because ochratoxin A contamination in these spices is not detected or very low.

Sampling Plan:

Thailand would like to suggest that the sampling plan should be developed when the MLs and types of spices are concluded and advanced for adoption by the CAC. Type, form and value of each spice should also be taken into consideration in the sampling plan.

Agenda Item 10: Discussion paper on the prevention or reduction of ciguatera poisoning

Thailand wishes to express its appreciation to the EWG chaired by the United State of America and co-chaired by the European Union on the establishment of a discussion paper on ciguatera poisoning. Principally, Thailand supports the establishment of a Code of practice (CoP) for the prevention and reduction of ciguatera poisoning as a new work. However, Thailand has some observations in the discussion paper of the CoP as follows:

- Thailand has not yet been carried out the surveillance and analyses of ciguatera poisoning.
- Now, there is no reference standard for analysis of ciguatera poisoning. Therefore, it is a limitation in development of analytical methods.
- Currently, there are various techniques developed for analysis of ciguatera poisoning. Each technique has different limitations in terms of sensitivity and accuracy. When the CoP is established, analytical methods for ciguatera poisoning should also be established as alternatives in choosing the suitable analytical method.
- Implementation of the principles of the Food Safety Management System (FSMS) based on the HACCP system may not be appropriate for small and medium-sized fishing businesses.