

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

CRD25

ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

13th Session

Yogyakarta, Indonesia, 29 April – 3 May 2019

Comments of Uganda

AGENDA ITEM 5 - PROPOSED DRAFT MLS FOR LEAD IN SELECTED COMMODITIES IN THE GSCTFF (CXS 193-1995) (AT STEP 4)

Uganda supports the lowering of MLs for lead in wines and edible offal from cattle, pig and poultry from:

- 0.2 mg/kg to 0.05 mg/kg and 0.15 mg/kg for non-fortified and fortified wines, respectively; and
- 0.5 mg/kg to 0.15 mg/kg for edible offal from cattle and pig and 0.1 mg/kg for edible offal from poultry.

Rationale: Analysis of lead contamination data for samples of both imported and locally (Uganda) produced wines between 2017 and 2019 indicated that all the wines had lead contamination levels below the ML proposed for fortified wine, 0.05mg/l.

For edible offal from cattle, pig and poultry, no data was considered for Uganda. Considering the report of the EWG, based on the WHO GEMS/Food database, and the ALARA principle the proposed MLs would provide adequate consumer protection and as well facilitate trade.

AGENDA ITEM 6 - PROPOSED DRAFT MLS FOR CADMIUM IN CHOCOLATE AND COCOA-DERIVED PRODUCTS (AT STEP 4)

Uganda supports the proposed draft MLs for cadmium in chocolate and cocoa-derived products.

Rationale: Data collected from various cocoa growing regions of Uganda between 2016 and 2018 indicate that total cadmium content of dried cocoa beans ranges from 0.065 – 0.355 mg/kg; below the MLs proposed for different chocolate and cocoa-derived products.

AGENDA ITEM 7 - DRAFT CODE OF PRACTICE FOR THE REDUCTION OF 3-MCPDES AND GES IN REFINED OILS AND FOOD PRODUCTS MADE WITH REFINED OILS (AT STEP 7)

Uganda supports the adoption of the COP by CAC42 at step 8.

Rationale: 3-MCPDE and 3-MCPD have toxic effects on kidneys and male reproductive organs, and 3-MCPD is a non-genotoxic carcinogen. GE and glycidol are genotoxic carcinogens. It is therefore necessary to promote best practices to minimise occurrence of these contaminants in foods.

AGENDA ITEM 8 - PROPOSED DRAFT ML FOR TOTAL AFLATOXINS IN READY-TO-EAT PEANUTS AND ASSOCIATED SAMPLING PLAN (HELD AT STEP 4)

Uganda supports setting the ML for total aflatoxins in ready-to-eat peanuts at 10 µg/kg.

Rationale: The ML of 10 mg/kg is already adopted and harmonised in the East African Community (For example: EAS 57-2, *Groundnuts (peanuts) — Specification Part 2: Roasted groundnuts (peanuts)*).

An ML of 15 mg/kg is established for peanuts for further processing (*Unless specified, seed or kernels, after removal of shell or husk*) in the GSCTFF. Processing technologies such as blanching, roasting, manual and electronic sorting have been reported to reduce aflatoxin contamination in peanuts. Colour sorting, combined with blanching have been shown to reduce aflatoxin contamination by as much as 90%. Therefore, taking into consideration the ALARA principle, the ML of 10 mg/kg provides good consumer protection from aflatoxicosis and facilitates trade.

AGENDA ITEM 9 - PROPOSED DRAFT MLS FOR TOTAL AFLATOXINS AND OCHRATOXIN A IN NUTMEG, DRIED CHILI AND PAPRIKA, GINGER, PEPPER AND TURMERIC AND ASSOCIATED SAMPLING PLANS (HELD AT STEP 4)

Uganda aligns itself with the conclusions at CCCF13:

- a) to suspend the work and to hold the ML of 20/30 µg/kg for AFT and 20 µg/kg for OTA in nutmeg, chili and paprika, ginger, pepper and turmeric, respectively, at Step 4 so that Members are given time to implement the Code of Practice for the prevention and reduction of mycotoxins in spices (CXC 78-2017);
- b) JECFA issues a call for data in three-years' time; and
- c) an EWG is re-established once the data are submitted to prepare a proposal for consideration by a future CCCF.

Rationale: Mycotoxin and ochratoxin contamination as a public health risk from spices is limited because of the very low levels of dietary exposure. It is rather a trade issue. The MLs should therefore be informed by occurrence data obtained after following good practices.