

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 5-11

CRD24

May 2022

ORIGINAL LANGUAGE ONLY

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

15th Session  
Virtual  
9-13 and 24 May 2022

Comments of India

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

**Comments:** India appreciates the work done by the Chair and co-chairs of the EWG for establishing maximum levels of Cadmium in cocoa powder.

With regard to the proposed MLs, India supports the lower limit of ML, 2mg/kg as per the global data set and rejection rate i.e below 5%.

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

**Comments:** India appreciates the work done by the Chair and co-chairs of the EWG.

India supports the final adoption of the CoP by CAC45.

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

**Comments:** India appreciates and congratulates Brazil for the work done in MLs for lead in various categories.

- India supports the proposal of “**not to establish Maximum Level (ML) for Lead for Fresh egg**”

**Rationale:** Keeping in view of low occurrence level and low relevance of Lead for fresh eggs in international trade and Residue Monitoring Plan (RMP) for egg and egg products

- India does not support the **proposed ML @ 0.06 mg/kg for Lead for Honey**

**Rationale:** (i) The proposed ML appears to be on stringent side because the lowest current limit in the international trade for lead in Honey is 0.1 mg/kg and any limit below it may have negative impact on international trade. (ii) Data set given in table C1 may not be considered as global representative data as data from major producing/exporting countries (like China, New Zealand, India etc.) is not represented. (iii) During three years i.e. 2018-19, 2019-20 and 2020-21, total 119, 168 and 209 samples of honey were tested for lead and out of these 02, NIL and 02 respectively were found non-compliant (against limit of 0.1mg/kg) as per Residue Monitoring Plan data.

Therefore, India proposes the ML of 0.1ppm for honey instead of 0.06ppm.

- India does not support the **proposed ML @ 0.1mg/kg for Lead for Sugar**

**Rationale:** The available data in India supports ML of 0.35mg/kg for lead in sugar, therefore India does not support the set limit of 0.1mg/kg.

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

**Comments:** India supports and agrees with recommendation of the of the EWG in the agenda item

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

**Comments:** India appreciates the work done by the Chair and co-chairs of the EWG. India supports and agrees with the recommendation of EWG except the ML for Polished rice for which India proposes the ML of 8 µg/kg as per the earlier recommendation.

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

**Comments:** India supports and agrees with recommendation of the EWG.

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

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**Comments:**

- India supports setting MLs of Total Aflatoxins for Chillies and Nutmeg at 20 ug/kg and Setting MLs of Ochratoxin A for Chillies and Nutmeg at 20 ug/kg. The MLs shall be considered for adoption at step 5/8.

**Rationale:** Non- harmonized MLs of Total Aflatoxins and Ochratoxin A across various countries for spices and its significant rejections/restrictions are impediment to the spices trade. Therefore, considering the facts that the spices are consumed in very less amount, lesser impact on public health and the significant rejections in the trade , a harmonized ML as proposed by the EWG would help the global spices trade and ensure fair trade practices .

- India is of the view that ISO 948 may be used as a reference sampling plan.