

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 1, 2, 3, 5, 6, 7, 8, 9, 10 and 14

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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 the United Republic of Tanzania

Agenda Item 1: Adoption of Agenda

GENERAL COMMENT

The United Republic of Tanzania (URT) support the adoption of the Provisional Agenda items as was circulated.

Agenda Item 2: Matters referred to the Committee by the Codex Alimentarius Commission and/or its subsidiary bodies

GENERAL COMMENT

The United Republic of Tanzania (URT) takes note of the Standards and related texts adopted at Steps 8 and 5/8 of the Procedure including consequential amendments by CAC45.

Agenda Item 3: Matters of interest arising from FAO and WHO including the Joint FAO/WHO Expert Committee on Food Additives

GENERAL COMMENT

The United Republic of Tanzania (URT) would like to thank the joint FAO/WHO JECFA Secretariats on their work: the Joint FAO/WHO Expert Committee on Food Additives has addressed issues on residues of veterinary drugs and food additives; while the WHO work on dioxin and dioxin-like compounds and the recommendations on updating the REP database indicated a need to re-evaluate the 2005 WHO TEF values for dioxins, furans and dioxin-like PCBs is welcome.

The United Republic of Tanzania (URT) further lauds the reliable information published on the Global Food Consumption Databases and ongoing activities to support countries to generate and to use data for risk analysis purposes, as this will significantly reduce costs of research in developing countries.

Agenda Item 5: Maximum levels for lead in certain food categories (at Steps 4 and 7)

The URT would like to appreciate the Electronic Working Group chaired by Brazil for their good work.

SPECIFIC COMMENT

Appendix I on Soft brown, Raw and non-centrifuged sugars

The URT support the adoption of ML of 0.15 mg/kg for Soft brown, Raw and non-centrifuged sugars

Appendix I on Ready-to-eat meals for infants and young children

The URT supports the adoption of a single ML of 0.03 mg/kg for the whole category of ready-to-eat meals for infants and young children

Justification

Provides opportunity to regulate cereal-based products for infants and young children.

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

The United Republic of Tanzania (URT) would like to thank the Electronic Working Group chaired by Nigeria and co-chaired by Ghana for their good work to come up with this draft code of practice for the prevention and reduction of mycotoxin contamination in cassava and cassava-based products

SPECIFIC COMMENT**Paragraph 17**

The United Republic of Tanzania (URT) proposes the second sentence of paragraph 17 to read “Excess precipitation during root maturation provides favourable condition for fungal infections”.

Justification

Fungal contamination through anthesis is not relevant in cassava.

Paragraph 21

The URT proposes the paragraph 21 to read, “Containers and conveyances (e.g., trucks) used for collecting and transporting the harvested roots from the field to processing and storage facilities, should prevent mechanical damage to cassava roots and be cleaned, sanitized and dried”.

Justification

Sanitization and cleaning involve removal of residues and all adhering dirty.

Paragraph 23

The URT proposes the paragraph 23 to be rephrased to read, as “Cassava roots should be stored in a suitable storage room. Enhanced storage methods of fresh cassava roots, such as storing in low temperatures in combination with fungicide treatment or waxing, can help extend shelf life of fresh roots by 2 to 6 weeks. This practice is suitable for storing or exporting large amounts of roots. Food handlers that can afford specialized equipment with the necessary technical skills may use improved storage methods to store fresh roots for preservation”.

Justification

To improve clarity

Paragraph 27

The URT proposes the paragraph 27 to be rephrased to read “For fresh boiled cassava, boiling should be done immediately after peeling and washing. This will expose any fungus to temperatures they cannot survive. If not used, immediately, adequate care should be taken to prevent fungal re-contamination”.

Justification

To improve clarity

Paragraph 29

The URT proposes the paragraph 29 to be rephrased to read, “Where cassava chips or slices are dried at farm level or in a processing facility, the chips or slices should be dried on cleaned, dry, raised platforms and at appropriate distance away from probable sources of contamination, such as refuse dumps”. When sun drying is carried out, it should be done on raised platforms that would ensure good hygienic practice

Justification

To improve clarity

Paragraph 30

The URT proposes the paragraph 30 to read, “If chips or slices are dried artificially, the dryers’ thermostat should be optimally maintained to achieve the acceptable moisture content of the cassava and cassava based products at the right time to prevent mold growth”.

Justification

To improve clarity

Paragraph 31

The URT proposes the paragraph 31 to be placed after paragraph 24 and reads “Unhygienic practices at this stage could serve as potential sources of fungal inoculum. Therefore, the environment and all tools used should be kept clean in all steps of processing”.

Justification

For logical flow

Paragraph 32

The URT proposes the paragraph 32 to be rephrased to read, “The fermentation of cassava roots is primarily used for further cyanide reduction, flavour development and product stability. All equipment used in fermentation should remain clean at all times to ensure they do not become a natural source of inoculum. Fermentation typically takes 2 to 5 days”.

Justification

To improve clarity

Paragraph 35

The URT proposes the paragraph 35 to be rephrased to read, “Cassava should be dried to acceptable moisture content to prevent fungal growth and subsequent mycotoxins production. High microbial loads may be caused by use of unclean drying surfaces and materials so care must be taken to clean surfaces. Granules or chips should be properly spread per square meter of drying surface and should not be overloaded to allow for air circulation. Platforms for drying should be raised to prevent contamination such as dust, animals, and pests. Batches of granules not adequately dried should be spread out in a ventilated room until the products are dried. Drying surfaces and materials should be clean”.

Justification

To improve clarity

Paragraph 36

The URT proposes the word washing to be removed from the statement “The milling machine should be cleaned and washed after use”

Justification

Washing implies the use of water and it may be difficult to wash some machines depending on their design and materials. Washing may lead to rusting if the used material is not stainless steel

Paragraph 39

The URT recommends changing the first sentence in paragraph 39 to include disinfection. The sentence should read ‘Storage facilities should be cleaned and disinfected with approved fumigants and pesticides before materials are brought in, to remove dust, fungal spores, crop residues, animal and insects droppings, soil, insects and foreign materials (e.g., stones, metal and broken glass, and other sources of contamination).

Justification

Cleaning is not effective to remove fungus and all insects

Section 6 and 7

The URT proposes the rearrangement of section 6 to be 7 and section 7 to be 6

Justification

For logical flow

Paragraph 40

The URT proposes the paragraph 40 to be rephrased to read, “Packaged cassava and cassava-based products should be stored in dry and cool conditions. Prevent direct contact with the floor or walls”

Justification

To improve clarity. Other statements fit more in packaging section.

Paragraph 42

The URT proposes to rephrase paragraph 42 to read “Moisture content of cassava-based products mainly in form of flour and granules shall be monitored before packaging to avoid packing a product that will favour the growth of micro-organisms. Cassava and cassava-based products should be packaged in food grade materials. Packaging materials should be made of materials, which should not absorb moisture when packed and sealed. Where necessary packaging technologies such as vacuum and modified atmosphere packaging can be applied”

Justification

To improve clarity. In addition, some statements fit more in storage section

Paragraph 43

The URT proposes to rephrase the first sentence of paragraph 43 to read, “Transport containers, including vehicles such as trucks and railway vessels, boats and ships should be clean (free of old crop dust, visible fungal growth, musty odour, insects and any contaminated material that could contribute to mycotoxin levels in lots and cargoes of cassava and cassava-based products) and dry to prevent fungal growth and cross contamination”.

Justification

To improve clarity.

Paragraph 43

The URT proposes the sentence that reads, “The use of registered fumigants or insecticides may be useful” to be deleted

Paragraph 45

The URT proposes to rephrase the paragraph 45 to read, “Avoid pest infestation during transport by the use of pest proof containers”.

Justification

To improve clarity

Paragraph 46

The URT proposes the sentence in paragraph 46 that reads, “Educators should create awareness on product stacking in storage areas to avoid increased humidity and temperature, which encourage fungal growth” to be deleted.

Justification

To improve clarity

Section 9

The URT proposes the title of section 9 to read “Product information and consumer awareness”

Justification

To improve clarity

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)**GENERAL COMMENT**

The United Republic of Tanzania (URT) appreciates the work done by the EWG chaired by Brazil and co-chaired by India and supports the proposed sampling plan for total aflatoxins in the selected food.

SPECIFIC COMMENTS**Page 4-7**

The URT proposes that the decision rule in page 4-7 should reflect the adopted ML of the respective product

Justification

The decision rules in the tables in pages 4-7 contradicts with the maximum level for URTh products

Appendix I

The URT proposes to link Table 3 and Table 4 with how to get incremental samples as described in the sampling plans

Justification

To avoid interference with the results as different solvents are used in slurry preparation

Paragraph 20

The URT proposes to rephrase the paragraph 20 to read “If the laboratory sample is prepared using a liquid slurry, the slurry should be made from an appropriate solvent and contain 25 g of sample mass”

Justification

To avoid interference with the results as different solvents are used in slurry preparation.

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

The URT appreciates the work done by the EWG and support the recommendation that a paper on a proposes ML for total aflatoxins in RTE peanuts and associated sampling plan be presented at CCCF17 (2024).

Justification

To facilitate establishment of relevant ML taking into consideration data from geographically diverse regions.

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)**GENERAL COMMENT**

The URT appreciates the work done by the EWG and proposes the work to be held at step 4 to allow incorporation of data from Africa so as to set a realistic ML for all spices

Justification

To facilitate establishment of relevant ML taking into consideration data from geographically diverse regions. Available data from URT will be presented for inclusiveness

SPECIFIC COMMENTS**Appendix 1, Part II**

The URT recommends provision of a sampling plans with inclusion of dynamic lots

Justification

Align the sampling plan with procedures used in CXS 193 in provisions in Annex 1 paragraph 8 and paragraph 17

Appendix 1, Part II

The URT proposes to include introduction and definitions section

Justification

Facilitating users of documents and overcome the confusions of used terms (considering the format of CXS 193 in Annex 1

Appendix 1, Part II in table 2

The URT requests a clarification of 8 (- < 12 kg) used in Table 2-page 11

Justification

This figure is not clear for users.

Appendix 1, Part II in table 1

The URT recommends borrowing the ranges used in the second and third columns Table 1 Subdivision of lots into sub-lots depending on product and lot weight in Appendix 1 on page11 of CX/CF 23/16/9, from Table 1 (the second and third columns). Subdivision of large lots into sub-lots for sampling in annex 1 page 15 of CXS 193-1995.

URT also proposes to insert a new range between 15-25 tons (as sub-lot 1) in the column of lot weight for Table 3 and Table 5 to be written as >15 and<25 tons.

The ranges shall be as follow:

>25 t

>15 and<25 t

<15 t

Justification

For clarity also this proposal shall address the confusion caused when practically subdividing into sub-lots the lot weight between 15 and 25 tonnes

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

The URT appreciates the work done by the EWG chaired by the United States of America and co-chaired by the European Union and recommends the EWG to revise the discussion paper for consideration by CCCF17.

Justification

To fill the gaps that have been observed in the existing discussion paper.

Agenda Item 14: Review of Codex standards for contaminants

GENERAL COMMENT

The URT appreciates and took note comments on the priority submitted by Comments of Canada, Ecuador, Egypt, Japan, Kenya, Iran, New Zealand, Peru, Republic of Korea, United States of America (USA), American Oil Chemists' Society (AOCS). The URT proposes the following priority list;

1. ML for aflatoxins in peanuts intended for further processing (Priority 2).

Rationale: since aflatoxins are genotoxic carcinogens, and there are possible deficiencies with other work Aflatoxins in Peanuts CoP (CXC 55-2004), where in List A.2 (Priority 2); CCCF is currently elaborating an ML for aflatoxins in RTE peanuts.

2. Aflatoxins in Peanuts CoP (CXC 55-2004)

Rationale: CCCF is currently elaborating an ML for aflatoxins in RTE peanuts.

3. ML for Aflatoxin M1 in Milks

Rationale: In List A.2 (Priority 2); aflatoxin M1 is a genotoxic carcinogen; possible efficiencies with other work – i) CoP for Raw Materials and Supplemental Feeding stuffs for Milk-Producing Animals (CXC 45-1997) in List A.2; ii) CoP for mycotoxins in cereals (CXC 51-2003) established in 2003 and since updated.

4. CoP for Raw Materials and Supplemental Feeding stuffs for Milk-Producing Animals (CXC 45-1997)

Rationale: aflatoxin M1 is a genotoxic carcinogen; possible efficiencies with other work concerning CoP for Raw Materials and Supplemental Feeding stuffs for Milk-Producing Animals (CXC 45-1997) in List A.2.

5. Patulin in apple juice ML

Rationale: In List A.2 (Priority 2); in revised List (Priority 2); dated JECFA evaluation (JECFA44, 1995) in 2007 as ML was established and not high priority (ALINORM 07/30/41, para. 127); possible deficiencies with other work-patulin in apple juice CoP (CXC 50-2003) in List A.2.

6. Patulin in apple juice CoP (CXC 50-2003)

Rationale: dated JECFA evaluation (JECFA44, 1995) in 2007 as ML was established and not high priority (ALINORM 07/30/41, para. 127); possible efficiencies with other work – i) patulin in apple juice CoP (CXC 50-2003) in List A.2

7. Tin in canned foods [in tinplate cans] CoP (CXC 60-2005) In List A.2 (Priority 2);

Rationale: Possible efficiencies with other work i) the two MLs for tin in foods and beverages packaged in tinplate packaging will be in List A.2 in 2023; there are 5 MLs for tin meats not packaged in tinplate cans in List A.1.

8. Cadmium in listed food commodities (certain cereal grains, legume vegetables, pulses, Brassica vegetables, bulb vegetables, fruiting vegetables, certain leafy vegetables, certain root and tuber vegetables, certain stalk and stem vegetables, wheat, cephalopods, marine bivalve molluscs, rice, polished): potential safety concern is moderate to high (priority level 1) – new occurrence data available, new dietary exposure data available, new health-based guidance value (HBGV), updated health risk assessment available from JECFA.

9. Fumonisin

Rationale: MLs for maize is long overdue and necessary to protect consumer health, considering that maize is a staple food in most parts of the African continent.

10. Acrylonitrile & vinyl chloride

Rationale: In List A.1 (Priority 1). For possible consideration for future topics for forward work planning, CCCF briefly discussed future food packaging and food contact materials, noting that these compounds are covered by the scope of the definition of a contaminant (CX/CF 19/13/18, Appendix D).