

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 7, 9, 13, 14, 15, 16

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON CONTAMINANTS IN FOODS

**17th Session
15-19 April 2024**

Comments submitted by International Union of Food Science Technology - IUFoST¹

The objective of this conference room document (CRD) is to offer comments on behalf of the International Union for Food Science and Technology (IUFoST) an observer organization of the Codex Alimentarius Commission on various agenda items tabled at the 17th Session of the Codex Committee on Contaminants in Food (CCCF17).

These comments were prepared by the Group of Experts of the Global Food Regulatory Science Society (GForSS), the Disciplinary Group for of the International Union of Food Science and Technology (IUFoST) and were endorsed by the Codex Committee of IUFoST.

The International Union of Food Science and Technology (IUFoST), and its membership from more than 100 countries, is the only representative of Food Science and Technology, elected by its multi-disciplinary peers as a full member in the International Science Council (ISC).

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

IUFoST would like to thank the Electronic Working Group (EWG) chaired by Brazil for preparing the document and offers the following comments:

- IUFoST supports the establishment of MLs for lead in Spices and Culinary Herbs given the frequent consumption of these commodities in several diets, and the potential detrimental health impact of lead.
- IUFoST supports efforts aiming to promote consensus at CCCF17, to reach MLs for lead in the food categories under discussion, to prevent the discontinuation of work.
- IUFoST supports the approach followed to reach the proposed MLs, aiming to lower the exposure to “as low as reasonably achievable” (ALARA) and guided by rejection rates of samples that would not exceed 5%.
- IUFoST notes that the ALARA is particularly relevant considering that there is no safe level established by JECFA for Lead. IUFoST also notes the robustness of the analysis developed to reach the proposed MLs, given that data extracted from the GEMS/Food database represented 6 regions (AFRO, EMRO, EURO, PAHO, SEARO, WPRO) and 35 countries, which can be considered as a high geographical representativeness.

IUFoST encourages the following future action by members of Codex and the overall food scientific community:

- To generate occurrence data for lead in culinary herbs and spices which would support future submissions to the GEMS Food database.
- To ascertain the achievability of the proposed MLs through on-going food monitoring activities at national levels.
- To ascertain consultation with the food production sector on the possible impacts of the proposed MLs, particularly in terms of availability and price of food products.

¹ This CRD was prepared by the Group of Experts of the Global Food Regulatory Science Society (GForSS), the Disciplinary Group for of the International Union of Food Science and Technology (IUFoST) and was reviewed and endorsed by the Codex Committee of IUFoST.

Agenda Item 6: Sampling plans for methylmercury in fish (at Step 4)

IUFoST would like to thank the EWG chaired by New Zealand and co-chaired by Canada and offers the following comments:

- A representative sample constitutes the basis for any accurate and precise analytical result. In this regard, IUFoST supports the adoption of the proposed sampling plan at Step 5/8 whilst noting that minor amendments are required for progressing the document further. In case significant technical challenges to implementation of the sampling plan are raised, an adoption at step 5 will allow time to address any remaining gaps.
- IUFoST encourages the food scientific community to collaborate in sharing data and research findings on methylmercury levels in fish species prevalent in their respective regions, particularly in relation with the distribution of this contaminant in fish.

Agenda Item 7: Definition for ready-to-eat peanuts for the establishment of a maximum level for total aflatoxins in this product

IUFoST would like to thank the EWG chaired by India on preparing this item and would like to note the following:

- The proposed definition for ready-to-eat (RTE) peanuts is well aligned with the definition previously adopted for RTE tree nuts. The proposed definition also offers examples of products that could be classified as RTE peanuts, thus bringing an additional level of clarification that would help data providers and data handlers to ensure a clear segregation of the data, where needed. The inclusion of peanut butter may require further discussion, as this product may deserve an individual category considering its different composition and consumption patterns.
- IUFoST supports the adoption of this new definition as it is necessary to enable moving forward with the establishment of the expected Maximum Level (ML) for AFT in RTE-peanuts, which constitute an important commodity for several producing and importing countries, where this contaminant needs to be managed and this ML would contribute to more predictable food regulatory measures.

Agenda Item 9: Code of practice/guidelines for the prevention and reduction of ciguatera poisoning (at Step 4)

IUFoST would like to thank the Electronic Working Group chaired by the United States of America and co-chaired by France, Panama, and Spain for preparing the Code of Practice for the prevention and reduction of ciguatera poisoning.

Ciguatera poisoning (CP) is supposed to be the most common type of food poisoning related to marine biotoxins. Currently, due to climate change and global trade of fish, CP illnesses seem to be of concern for a wider range of countries and are not limited anymore to the regions where toxic algae are known to accumulate in fish.

IUFoST supports the advancement of the work leading to the establishment of a CoP related to CP in the Codex step procedure.

Agenda Item 13: Request for comments on the recommendation for the establishment of maximum levels for cadmium and lead in quinoa

IUFoST would like to thank the JECFA secretariat for preparing this discussion paper. The methodology of work followed the previously agreed-upon approach aiming to achieve the “as low as reasonably achievable” (ALARA) principle and leading to rejection rates that do not exceed the cut-off of 5%.

- IUFoST considers that the discussion paper presents enough data-driven evidence supporting the establishment of MLs for both cadmium and lead in quinoa. Further efforts may however need to be deployed to generate and collect consumption data, in different regions of the world specific to this commodity.

IUFoST notes that the JECFA assessment concluded to the fact that, if established, MLs might not contribute significantly in the reduction of exposure to cadmium and lead, as quinoa is not considered to be a major source of exposure to these contaminants. However, IUFoST considers that adopting the proposed MLs of 0.1 mg/kg for lead and cadmium in quinoa (grain, seed and flour), would be an additional measure guiding countries to manage exposure to these heavy metals from various sources, including quinoa.

Agenda Item 14: Review of the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004)

IUFoST would like to thank the EWG chaired by Brazil for the preparation of the discussion paper. IUFoST supports the recommendations of the EWG to update the CoP with new scientific data and effective measures for aflatoxin management in peanuts, reflecting advancements in research and current applications.

Agenda Item 15: Review of the Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feedingstuffs for Milk-Producing Animals (CXC 45-1997)

IUFoST would like to thank the EWG chaired by Canada and co-chaired by Japan and the United States of America for the preparation of this discussion paper.

IUFoST supports this proposal, which will encompass updated information, incorporating recent scientific developments and practices. IUFoST supports the expansion of the CoP's scope to include non-cereal feeds, thereby covering all sources of aflatoxin contamination, while emphasizing the importance of clarifying definitions and terminology through standardized references to enhance understanding and implementation.

Agenda Item 16: Development of a Code of practice for the prevention and reduction of cadmium contamination in foods

IUFoST would like to thank the United States of America for the preparation of this discussion paper.

IUFoST supports the development of a CoP to prevent or reduce cadmium contamination in foods, considering that there is sufficient information available on cadmium sources and mitigation measures.

IUFoST supports the development of annexes that would contain commodity-specific recommendations, potentially enclosing the CoP for the Prevention and Reduction of Cadmium Contamination in Cocoa Beans.