



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-fifth Session

FAO Headquarters, Rome, Italy

21-25 November and 12-13 December 2022

Comments from the United Republic of Tanzania

Agenda 4.5 Codex Committee on Contaminants in Foods

Maximum levels for total aflatoxins in maize grain, destined for further processing; flour meal, semolina and flakes derived from maize; husked rice; polished rice; sorghum grain, destined for further processing; cereal-based food for infants and young children (excluding foods for food aid programs), and cereal based food for infants and young children for food aid programs

Position 1: Tanzania does not support adoption of the ML of 15 µg/kg proposed for maize grain for further processing and proposes the adoption of 10 µg/kg

Rationale: In Tanzania, a huge proportion of maize grain is sold as such for direct human consumption. It may be recalled that at CCCF14, it was accepted that it would be difficult to segregate data for maize for human consumption intended for direct human consumption or animal feed, as its intended purpose was not always indicated on the lot. Given this acceptance, CCCF14 directed that consideration should be given to establishing an ML only for ready-to-eat maize based on the whole dataset. This was more suitable for human health protection especially in the African region where maize was a staple food and was traded as maize regardless of whether it would be going for further processing or was meant for direct human consumption.

In the same context, Tanzania as members of the East African Community, 7-member Partner States have already adopted 10 µg/kg for maize grains regardless of whether it is destined for further processing or human consumption. This approach is taken to protect the people in Tanzania consuming maize grains without further processing or where maize grain is processed using dry milling (a common practice in most African Countries) which does not reduce aflatoxin contamination.

Position 2: Tanzania does not support adoption of the ML of 20 µg/kg for husked rice and proposes the adoption of 10 µg/kg

Rationale: Tanzania, through the African Standardization Organization (ARSO) and African Regional Standardization such as the East African Community Standards Committee have already adopted 10µg/kg for rice regardless of whether it is polished or not. This approach is taken to protect the people in Tanzania consuming rice as staple, whether polished or husked.

Position 3: Tanzania does not support the adoption of the ML 5 µg/kg proposed for total aflatoxins in cereal-based food for infants and young children and proposes the adoption of 3 µg/kg.

Rationale: Infants and young children are very vulnerable to aflatoxin exposure and there is no safe limit for aflatoxins exposure as these are confirmed carcinogens and genotoxins.

Position 4: Tanzania does not support the adoption of the ML of 10 µg/kg proposed for cereal-based foods for infants and young children destined for food aid programs and proposes the adoption of uniform limits of 3 µg/kg for infants and young children regardless of purpose of product.

Rationale: Good regulatory practice requires Codex to adopt the same limit of aflatoxins in cereal-based foods for infants and children regardless of whether the foods are for the general purpose or for food aid programs.

As previously explained, infants and young children are very vulnerable to aflatoxin exposure and there is no safe limit for aflatoxins exposure as these are confirmed carcinogens and genotoxins. Furthermore, food aids are destined to infants whose health condition is already compromised..