

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
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World Health
Organization

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON CONTAMINANTS IN FOODS
18th Session**

**Bangkok, Thailand
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COMMENTS OF EAST AFRICAN COMMUNITY (EAC)

The East African Community (EAC) Secretariat appreciates the opportunity to provide comments on the different agenda items to be discussed by the 18th session of the Codex Committee on Contaminants in Foods.

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

GENERAL COMMENT

The EAC notes the standards and related texts adopted at Steps 8 and 5/8 of the Codex procedure with respect to the Codex Committee on Contaminants in Foods (CCCF). The EAC also takes note of the discontinuation of work on MLs for lead in spices (dried flowers) and fresh culinary herbs, and acknowledges the strategic directions outlined in the Codex Strategic Plan.

SPECIFIC COMMENT

The EAC supports the recommendation to include EN 17641 as an example method in the numeric performance criteria table of the sampling plan for aflatoxins in certain cereals and cereal-based products, including foods for infants and young children, as outlined in the General Standard for Contaminants in Food and Feed (CXS 193-1995). The EAC agrees with the inclusion of the following footnote: *"The sampling plan specifies a test portion size of 25.0 g, and EN 17641 uses a test portion size of 5.0 g. No alternative method was found that meets the performance criteria. Therefore, EN 17641 is included as an example method, as it is the best possible method at this time. The smaller test portion size may introduce additional variation in the test result."* The EAC further requests that CCCF consider transferring all numeric performance criteria for analytical methods currently found in the sampling plans of CXS 193 to CXS 234, once the review of numeric performance criteria under CCCF is complete.

Moreover, the EAC supports the approach taken by CCMAS43 in advising CCCF to include an example method that meets the performance criteria for determining aflatoxin MLs in relevant cereal-based products, thereby enhancing clarity and harmonization across Codex texts. The EAC takes note of the other matters provided for information and appreciates the continued collaboration between CCCF and CCMAS to strengthen food safety standards globally.

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

GENERAL COMMENT

The EAC expresses its appreciation to FAO and WHO for their continued work in advancing food safety and Codex work. The EAC supports these efforts and remains committed to active participation, including the contribution of regional data to support risk assessments and early warning systems, particularly in areas such as mycotoxins, pesticide residues and microplastics. The EAC recognizes the importance of accessing and engaging with the wide range of technical publications made available on the FAO and WHO websites and encourages their use as reference tools to inform regional policy and regulatory decisions.

RATIONALE

The work of FAO and WHO contributes directly to the development of effective and efficient food control systems, which play a critical role in protecting consumer health and facilitating safe food trade. Scientific data and risk assessments generated through these global initiatives provide a solid foundation for evidence-based decision-making

and tailored food safety interventions at the regional levels. Importantly, as some of the data used in these assessments originate from within EAC countries, this reinforces the relevance and applicability of the outcomes to local contexts.

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

GENERAL COMMENT

The EAC appreciates the opportunity to provide comments on the proposed MLs for lead in spices (dried bark) and dried culinary herbs, as outlined in document CX/CF 25/18/5. The EAC commends the CCCF and the EWG for the technical work and data analysis undertaken to support the establishment of updated MLs. The EAC acknowledges that lead contamination in spices and herbs presents a significant public health concern, particularly in light of the widespread consumption of these products in traditional cuisines in East African countries as well as their growing use in processed foods.

Given the toxicological profile of lead and its severe health effects, especially on vulnerable populations including pregnant women, children under the age of six, malnourished children (notably those with calcium or iron deficiencies) and populations in low- and middle-income countries with limited regulatory oversight, the EAC strongly supports Codex's efforts to establish protective and evidence-based MLs.

The EAC emphasizes that Codex standards should balance public health protection with the realities of international trade and the capacities of food producers in different regions. Therefore, it is essential that proposed MLs be both scientifically justified and practically achievable, especially for smallholder producers and small and medium-sized enterprises (SMEs) in developing countries. In this context, the EAC supports the setting of MLs that are protective of health while also allowing for feasible implementation and market access for producers in the region.

SPECIFIC COMMENT

The EAC supports the discontinuation of the MLs for lead in dried bark spices and dried culinary herbs adopted by CAC47 (2024), in favour of the revised MLs proposed by the EWG.

The EAC recommends the advancement of the revised MLs to Step 5/8 for adoption by CAC48.. The EAC further notes that some of the proposed MLs are already aligned with values applied under domestic and regional food safety frameworks, as well as export quality standards.

RATIONALE

Data submitted to the GEMS/Food database is more representative and reflects improved global contamination profiles, enhanced analytical capabilities, and the adoption of better agricultural and processing practices.

Additionally, the principle of ALARA (As Low As Reasonably Achievable) aims at minimizing contaminant exposure while ensuring practical implementation. Available evidence shows that lead levels in most sampled commodities fall below the current limits, indicating minimal health risk at the proposed levels. The revised MLs are therefore appropriate and strike a balance between consumer protection and trade facilitation. Moreover, with estimated product rejection rates remaining below 5%, the proposed MLs are unlikely to result in significant trade disruptions and will help ensure harmonized and fair market access for producers in the EAC and beyond.

Agenda Item 6: Code of practice for the prevention and reduction of cadmium contamination in foods (at Step 4)

GENERAL COMMENT

The EAC welcomes the opportunity to provide comments on the proposed *Code of Practice (CoP) for the Prevention and Reduction of Cadmium Contamination in Foods* (CX/CF 25/18/6). We commend the CCCF and the EWG for their continued efforts to address chemical contaminants of global public health concern through practical, science-based, and globally relevant interventions.

Cadmium is a toxic heavy metal with cumulative health effects, especially on the kidneys and bones, and is associated with long-term dietary exposure through staple foods. The EAC considers the mitigation of heavy metal contamination a critical food safety priority, especially in widely consumed food categories such as cereal grains, pulses, leafy vegetables, and seafood. The EAC fully supports the development of a comprehensive and implementable Code of Practice that incorporates good agricultural practices, post-harvest handling procedures, environmental controls and feasible risk mitigation strategies applicable to both large-scale and smallholder production system. The EAC further underscore the importance of integrating region-specific risk management options that reflect local environmental conditions, agricultural practices, and dietary exposure patterns. In this regard, the EAC encourages the EWG to ensure inclusive and equitable regional participation particularly from Africa and other regions facing constraints related to data availability and implementation capacity. The EAC remains committed to contributing relevant data, experiences, and technical inputs and welcomes opportunities to engage in future consultations and discussions. The EAC supports

for the development of a practical, inclusive, and evidence-driven Code of Practice and looks forward to contributing to its finalization and implementation.

SPECIFIC COMMENT

The EAC finds the overall structure of the draft Code of Practice for the Prevention and Reduction of Cadmium Contamination in Foods (CX/CF 25/18/6) to be logical, coherent, and aligned with the format of other Codex Codes of Practice. The inclusion of general risk management principles followed by commodity-specific annexes is appropriate and supports practical implementation across different food sectors. The EAC recommends that the section on soil and water management be strengthened to include measures that are more actionable. Specifically, we propose the promotion of soil testing to identify cadmium accumulation in high-risk agricultural zones, the adoption of crop varieties with low cadmium uptake, and the application of phosphate fertilizers with minimal cadmium content, in accordance with national agricultural guidelines. Additionally, the CoP should include examples of low-cost, scalable practices that are suitable for small and medium-scale farmers in low-income countries, especially those operating in rain fed and peri-urban farming systems.

The EAC supports the development of both existing annexes and encourages the inclusion of additional practices such as periodic testing of irrigation water for cadmium contamination, the use of crop rotation with non-cadmium accumulating crops, and improved drainage systems to reduce cadmium solubility in flooded rice paddies. Furthermore, the EAC recommends developing additional annexes to cover priority commodities based on regional dietary exposure and cadmium occurrence. These include leafy vegetables such as spinach and amaranth, which are common in East Africa and prone to cadmium accumulation due to their high transpiration rates; pulses and legumes, which serve as essential protein sources in the region and are often grown in cadmium-prone soils; and wheat and maize, which are major dietary staples, East African countries, and crucial for regional food security.

The EAC also supports the integration of the *Code of Practice for the Prevention and Reduction of Cadmium Contamination in Cocoa Beans (CXC 81-2022)* into the general CoP as an annex. Consolidating relevant guidance in a single, harmonized document enhances accessibility and implementation, if the specific recommendations for individual commodities are preserved and updated as needed. In addition, the EAC supports the re-establishment of the EWG to continue developing and refining the Code of Practice. This includes completing and enhancing existing annexes, incorporating additional high-priority commodities, and ensuring broad regional participation. The EAC believes this continued work will support the development of a practical, inclusive, and science-based Code of Practice that addresses the global challenge of cadmium contamination in foods.

Agenda Item 7: Sampling plans for total aflatoxins and ochratoxin A in certain spices (at Step 7)

GENERAL COMMENT

The EAC would like to thank the Electronic Working Group chaired by Brazil for the preparation of sampling plans for total aflatoxins and ochratoxin A in certain spices for consideration by CCCF18.

SPECIFIC COMMENT

The EAC supports the recommendations of the Electronic Working Group as outlined in document CX/CF 25/18/8, specifically:

- i. Correct overlapping notations in tables (e.g., ">10–≤15" to ">10–<15")
- ii. Retain the current method performance criteria for precision at ≤44% and recovery at 60–115%.
- iii. The adoption of a separate ML for AFB₁ (15 µg/kg) in future discussions

Rationale

- i. The proposed notation correction removes ambiguity and aligns with standard scientific expression, improving clarity in data interpretation and regulatory use.
- ii. The recovery is good enough for low concentration. However, raising the concentration would demand a high recovery.
- iii. Supporting the consideration of a separate ML for AFB₁ reflects a refined and targeted approach to risk management. Given the higher toxicity of AFB₁ relative to total aflatoxins, this adjustment would enhance public health protection and align regulatory actions more closely with the toxicological profile of individual aflatoxins.

Appendix I, Table 5 & 6

The EAC proposes the minimum weight of aggregate samples to remain unchanged.

Rationale

Increase in initial weight of aggregate samples would demand increasing number/weight of incremental samples, which is disputed.

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

The EAC would like to thank the Electronic Working Group chaired by India and co-chaired by the United States of America for preparation of the document for consideration by CCCF18.

SPECIFIC COMMENT

The EAC supports the advancement of the maximum limit (ML) of 10 µg/kg for total aflatoxins in ready-to-eat peanuts to CAC48 for final adoption.

RATIONALE

Given that ready-to-eat peanuts are consumed without further processing, this limit is critical to reduce dietary exposure to aflatoxins-potent carcinogens with significant health risks, particularly in children and immunocompromised populations.

Further this is consistent with the Codex principle of ALARA (As Low As Reasonably Achievable).

Furthermore, this limit facilitates regional and international trade by aligning with the regulatory standards of major importing markets, minimizing the risk of border rejections and protecting producers' livelihoods. It complements the already adopted ML of 15 µg/kg for peanuts intended for further processing, offering a logical and protective framework for aflatoxin control.

Agenda Item 9: Review of the Code of Practice for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004) (at Step 4)**GENERAL COMMENT**

The EAC would like to thank the Electronic Working Group chaired by China, co-chaired by India for the efforts. The EAC supports the adoption of the revised Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004) and endorses its advancement through the Codex step procedure for final adoption by CAC48, once all the technical and editorial issues have been agreed to.

RATIONALE

Peanuts are important for food security and nutrition in East African region, serving both subsistence and commercial roles. They deliver essential nutrients and generate income for many smallholder farmers. As a staple in local diets and a significant export commodity, peanuts contribute significantly to regional economy.

Updating the Code of Practice to reflect the latest scientific evidence and best practices is critical to reducing aflatoxin contamination in peanuts. A revised Code will safeguard public health by ensuring food safety, facilitate domestic and international trade, protect consumers from exposure, and strengthen regulatory compliance across the peanut value chain.

SPECIFIC COMMENT**Appendix I, Scope**

The EAC proposes to rephrase the first sentence under scope to read "This document is intended to provide guidance for all parties involved in Pre and post-harvest handling of peanuts intended for food and feed".

Rationale

To broaden applicability and clarify stakeholder responsibilities.

Appendix I, Definitions

The EAC proposes to redefine the definition of moisture content to read "The total amount of water present in a material, expressed relative to either its dry basis or wet basis."

Rationale

To enhance clarity and ensure a more technically precise understanding of the term across scientific and regulatory contexts.

Appendix I, Definitions

The EAC proposes to rephrase the definition of water activity to read “Water that is not bound to food molecules that can support the growth of bacteria, yeasts, and fungi”.

Rationale

To enhance clarity and technical accuracy.

Appendix I, Paragraph 55

The EAC proposes to rephrase the last sentence to read “Organic supplements, such as composting manure and crop residues (i.e. non-aflatoxigenic fungi host), improve the soil's water-holding capacity, minimizing the effect of drought during plant development and reducing fungal infection and aflatoxin accumulation in the peanut seeds”.

Rationale

To address the risk that some crop residues may carry aflatoxigenic fungi.

Agenda Item 10: Review of the *Code of practice for weed control to prevent and reduce pyrrolizidine alkaloid contamination in food and feed (CXC 74-2014)* and Guidance on sampling and analysis performance characteristics for the collection of data for submission to the GEMS/Food database**GENERAL COMMENT**

The EAC welcomes the opportunity to provide comments on the proposed revision of CXC 74-2014 and the development of associated sampling and analysis guidance. The EAC acknowledges the growing international concern regarding pyrrolizidine alkaloids (PAs) due to their hepatotoxic and carcinogenic properties and the implications for both human and animal health. Although data on PA contamination in East Africa region remains limited, the EAC recognizes the potential risk posed by the diverse presence of PA-producing plants in rangelands, farmlands, and natural ecosystems, and the possibility of contamination in honey, herbal teas, leafy vegetables, and animal feeds. These risks are exacerbated by climate variability, limited awareness, and informal production and marketing channels. Therefore, the EAC supports the review of the Code of Practice for Weed Control to prevent and reduce Pyrrolizidine Alkaloid Contamination in Food and Feed (CXC 74-2014). The EAC further supports the development of guidance on sampling and analytical performance characteristics for data collection to be submitted to the GEMS/Food database, which will be incorporated into a JECFA call for data. Furthermore, The EAC supports the advancement of this work through the Codex stepwise process.

RATIONALE

Pyrrolizidine alkaloids (PAs) are toxins produced by an estimated 6000 plant species. More than 600 different PAs, mainly 1,2-unsaturated PAs, including their associated nitrogen oxides (N-oxides), are known, and new PAs continue to be identified in both new and previously studied plant species. PAs were assessed by the Joint Food and Agriculture Organization of the United Nations (FAO)/World Health Organization (WHO) Expert Committee on Food Additives (JECFA), at its 18th meeting, which took place in Rome, Italy, from 16 to 25 June 2015.

The Joint FAO/WHO Expert Committee on Food Additives (JECFA) has identified pyrrolizidine alkaloids (PAs) as toxins of concern. JECFA conducted a full risk assessment of PAs, recognizing their toxicity, including carcinogenic potential, primarily from 1, 2-unsaturated PAs found in many plants. Due to their genotoxic-carcinogenic nature, no safe threshold for 1,2-unsaturated PAs could be established, highlighting the need for minimizing exposure

PAs enter the food chain through contaminated plant material or transfer from animal feed to animal products. Pyrrolizidine alkaloids pose a significant health risk to humans, primarily through their toxic effects on the liver, immune suppression and potential to cause genetic damage and cancer. Exposure should be minimized, and contaminated food sources should be avoided. Children and individuals with compromised immune systems are particularly vulnerable. PAs contamination can also restrict trade; hence reducing its contamination is essential for safeguarding public health, ensuring food safety, and facilitating trade.

SPECIFIC COMMENT

The EAC recommends that the rationale presented in Appendix II be expanded to highlight the increasing global trade in herbal and traditional products, which may elevate consumer exposure to pyrrolizidine alkaloids (PAs), particularly in low- and middle-income countries (LMICs). The project document should also place greater emphasis on the importance of targeted risk communication and capacity building for regulatory authorities and producers in developing countries, to enhance awareness, monitoring, and control of PA contamination in such products.

RATIONALE

Highlighting the increased global trade in herbal and traditional products is critical, as it reflects the shifting consumption patterns and the growing availability of these products in LMICs, where regulatory systems may be less robust. In many LMICs, herbal products are widely used for cultural, medicinal, or nutritional purposes, often outside formal regulatory oversight. As noted in CX/CF 25/18/13, PAs pose serious health risks, including hepatotoxicity and potential carcinogenicity. Without targeted risk communication and capacity building, producers and consumers in these regions may remain unaware of contamination risks, and authorities may lack the tools or expertise to adequately monitor or mitigate exposure. Therefore, integrating a strong rationale that underscores these challenges will improve the global relevance and inclusiveness of the project.

SPECIFIC COMMENT

The EAC finds the proposed outline generally reasonable, with notable improvements in both structure and clarity. The inclusion of dedicated sections addressing control measures at the stages of primary production, processing, and distribution is particularly relevant. These enhancements align well with the food safety challenges experienced within East African regional informal markets and value chains.

To further strengthen the document, the EAC proposes the addition of a section focused on stakeholder education and public awareness. This section should target key actors such as producers, harvesters, and small-scale processors, who play a crucial role in the management of pyrrolizidine alkaloid (PA) contamination.

In addition, the EAC suggests incorporating content on the risks associated with traditional foods and herbal products, including specific guidance on safe sourcing and labelling practices. Given the growing consumption and trade of such products, clear recommendations are necessary to ensure consumer protection.

Lastly, the EAC recommends the inclusion of a subsection on climate change adaptation. This should acknowledge how changing rainfall and temperature patterns may contribute to the increased proliferation of PA-producing weeds, thereby influencing contamination risks. Addressing this emerging challenge would enhance the relevance and applicability of the revised guidance.

Agenda Item 12: Review of the *Code of practice for the reduction of aflatoxin B1 in raw materials and supplemental feeding stuffs for milk-producing animals (CXC 45-1997)*

GENERAL COMMENT

The EAC appreciates the efforts of the EWG and supports the initiation of new work to review the Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feed for Milk-Producing Animals. The EAC also endorses the advancement of this work through the Codex stepwise process.

Furthermore, the EAC fully supports the issuance of a Circular Letter after CCCF18 to request additional data and risk management practices from member countries. To enhance the relevance and inclusivity of the revised Code of Practice, the EAC recommends that the Circular Letter explicitly encourage contributions from LMICs, whose production environments may differ significantly from those of high-income countries. Additionally, the EAC supports the re-establishment of the EWG to lead the revision process, with active involvement of countries from aflatoxin-prone regions, including sub-Saharan Africa. The EAC is open to participating in the EWG and contributing technical expertise, surveillance findings, and practical experiences to ensure that the revised Code is both scientifically sound and practically applicable across diverse settings.

RATIONALE

Given the time elapsed since the development of CXC 45-1997, it is timely to revise the Code of Practice using emerging scientific evidence and practical experiences in aflatoxin management. Updating this guidance will strengthen efforts to ensure the safety of raw materials used in feed for milk-producing animals, thereby contributing to the production of safe milk for human consumption.

Aflatoxins present serious public health risks, including acute and chronic toxicity, liver damage, immune suppression, and increased risk of liver cancer particularly affecting vulnerable groups such as children and immunocompromised individuals. Contamination can also restrict trade, especially in regions like East Africa where enforcement capacities are variable. Encouraging data contributions from LMICs will help tailor the revised CoP to diverse production contexts and strengthen its global applicability. Additionally, harmonizing Codes of Practice across commodities will support consistent aflatoxin control and risk mitigation measures.

SPECIFIC COMMENT

The EAC recommends including in the rationale the increased detection of aflatoxin M1 in milk in Africa and the vulnerability of small-scale farmers who often rely on home-mixed or unregulated feeds.

Further in Section 2 (Relevance and Timeline), the EAC proposes the inclusion of climate variability as a significant factor contributing to increased aflatoxin contamination. This addition underscores the necessity to update the Code of Practice to address emerging challenges as proposed to read "The last sentence in Section 2 of the project document to read: "Furthermore, JECFA concluded at its 56th meeting in 2002 that aflatoxin M1 is a genotoxic carcinogen noting that also climate variability is a contributing factor to increased aflatoxin contamination, reinforcing the need to update the code of practice."

RATIONALE

Climate variability, encompassing alterations in temperature, precipitation patterns, and the frequency of extreme weather events, has been identified as a key driver of mycotoxin accumulation in agricultural systems. The FAO publication *Climate Change: Unpacking the Burden on Food Safety* (FAO, 2020) highlights several pertinent findings:

- **Increased Risk of Mycotoxin Accumulation:** Elevated temperatures and fluctuating precipitation levels can enhance the growth of mycotoxin-producing fungi, such as *Aspergillus flavus*, leading to higher aflatoxin levels in crops both pre- and post-harvest.
- **Impact on Mitigation Strategies:** Traditional methods for controlling mycotoxin contamination, including crop rotation and fungicide application, are becoming less effective due to the changing climate, necessitating the development of adaptive strategies.
- **Need for Enhanced Monitoring:** The publication emphasizes the importance of improved prediction and monitoring systems to detect mycotoxin presence and guide the responsible use of fungicides, ensuring food safety in the face of climate-induced challenges.

SPECIFIC COMMENT

The EAC supports the integration or cross-referencing of relevant Codex Codes of Practice to enhance harmonization and minimize duplication across standards. However, EAC expresses caution against merging texts in a manner that might dilute the specificity required for high-risk commodities such as dairy feed. The EAC therefore underscores the importance of maintaining focused guidance on dairy specific feed practices within the revised Code of Practice to ensure its continued effectiveness in supporting milk safety assurance systems.

The EAC considers the proposed outline of the revised Code logical and welcomes the inclusion of new sections on climate-smart aflatoxin management practices, feed quality control and traceability, and the integration of Hazard Analysis and Critical Control Points (HACCP) in feed production. Furthermore, the EAC recommends the addition of practical and regionally relevant elements such as low-cost storage solutions for smallholder farmers (e.g., hermetic bags or community silos), the regulated and evidence-based use of aflatoxin binders and feed additives, and the promotion of public-private partnerships to strengthen feed testing infrastructure.

SPECIFIC COMMENT

The EAC recommends that the revised CoP also address Capacity building needs for regulators farmers and feed manufacturers; consumer education on the risks of aflatoxins in milk; Promotion of regional harmonization of feed quality standards across Eastern Africa; and Sensitization on alternative uses of feeds contaminated with aflatoxins above allowable levels for different species.

RATIONALE

The inclusion of these additional elements will strengthen the practical applicability of the revised CoP and align it with the realities of aflatoxin control in sub-Saharan Africa and other low- and middle-income regions.

SPECIFIC COMMENT

The EAC recommends the consistent use of the term "fungi" throughout the document, instead of using "mold" and "fungi" interchangeably.

RATIONALE

This recommendation aims to improve clarity and consistency in terminology, thereby enhancing the scientific accuracy and understanding of the document.

Agenda Item 13: Development of a Code of practice for the prevention and reduction of tropane alkaloids in food and feed**GENERAL COMMENT**

The EAC supports the proposal for new work on the development of a Code of Practice for the Prevention and Reduction of Tropane Alkaloids Contamination in Food and Feed, and submission of the revised draft Code of Practice to the next session of the Codex Committee on Contaminants in Foods (CCCF18) for discussion.

The EAC also supports the re-establishment of the Electronic Working Group (EWG) to develop the draft CoP further, as this will provide an inclusive platform to integrate feedback from diverse production contexts, particularly from developing countries.

RATIONALE

The development of this code is important due to the serious public health risks posed by tropane alkaloids, which are naturally occurring toxins found in certain plants that may inadvertently contaminate food and feed during harvesting and processing.

A comprehensive code of practice will provide guidance on preventive measures, good agricultural and manufacturing practices, and appropriate control strategies throughout the food and feed supply chains.

SPECIFIC COMMENT

The EAC supports the project document and proposes the following refinement:

- Clarify the risk profile for LMICs: The rationale should explicitly highlight the increased vulnerability of LMICs to tropane alkaloid (TA) contamination. This vulnerability stems from factors such as widespread reliance on hand harvesting, limited access to advanced weed control technologies, and insufficient monitoring and analytical infrastructure. Emphasizing these contextual challenges will help ensure the project reflects the realities of LMICs and supports the development of targeted risk management strategies.

RATIONALE

Contextualizing the risks in LMICs ensures that mitigation strategies developed in the Code of Practice are inclusive, feasible, and responsive to on-the-ground challenges, thereby increasing the relevance and effectiveness of the guidance across diverse production systems.

SPECIFIC COMMENTS

The EAC finds the current structure of the CoP generally appropriate but recommends the inclusion of the following additional sections:

1. Section on Identification and Mapping of High-Risk Crops and Areas: Guidance should be provided for countries to identify crops and regions most at risk for TA contamination, based on environmental conditions and known prevalence of TA-producing weeds.

Rationale: Tailoring interventions requires targeted surveillance. This would support better resource allocation for mitigation and capacity building.

2. Section on Analytical Methods and Laboratory Capacity Needs: Include recommendations for tiered approaches to TA testing (e.g., basic screening and confirmatory testing), and reference international initiatives for laboratory support in developing countries.

Rationale: The countries under EAC, like many developing countries, faces challenges in TA detection due to limited access to specialized instrumentation. Including accessible methods and regional collaboration options will enhance implementation.

3. Section on Stakeholder Training and Public Awareness: Introduce a section focused on farmer education, extension services, and awareness for food and feed manufacturers about TA risks and mitigation techniques.

Rationale: Raising awareness at the farm level and along the feed value chain is critical in achieving meaningful reduction in TA contamination. The EAC's experience with aflatoxin control shows that behavioural change is essential for risk mitigation.

SPECIFIC COMMENT

The EAC recommends expanding guidance on integrated weed management, including culturally appropriate practices such as manual weeding and intercropping.

RATIONALE

Many EAC farmers rely on non-chemical methods. Practical, low-cost interventions need to be explicitly recognized and supported in the CoP.

SPECIFIC COMMENT

The EAC emphasize the importance of sorting and removal of weed seeds during threshing and storage, especially for small-scale operations

RATIONALE

Post-harvest contamination remains a concern in informal sectors where mechanized cleaning is limited.

Agenda Item 14: Guidance on data analysis for the development of maximum levels and for improved data collection**GENERAL COMMENT**

The EAC supports the endorsement of the main part of the Guidance on Data Analysis for Development of Maximum Levels as provided in Appendix I. The EAC further recommends the consolidation of Annex III and Annex V into a single, integrated annex within the Guidance on Data Analysis for Development of Maximum Levels

RATIONALE

The guidance will significantly enhance the quality and consistency of data collection, analysis, and interpretation processes that underpin the establishment of science-based MLs for contaminants and other substances in food. The structured analytical approach outlined in the main guidance promotes transparency, scientific robustness, and harmonized practices across risk assessment and risk management activities.

In this context, merging Annex III, which provides a step-by-step computational framework for estimating hypothetical MLs and Annex V, which presents the resulting outputs into a unified annex would improve the usability and coherence of the guidance. This integration would minimize redundancy, ensure logical continuity between input and output data, and promote greater clarity in documenting and interpreting analytical processes and results.

Agenda Item 15: Review of numeric performance criteria for methods of analysis for total aflatoxins utilizing the sum of components concept in relevant sampling plans**GENERAL COMMENT**

The EAC supports the adoption of the revised method performance criteria as proposed in the Appendix of CX/CF 25/18/16 for: peanuts intended for further processing, ready-to-eat tree nuts, tree nuts destined for further processing: almonds, hazelnuts, pistachios, and shelled Brazil nuts, dried figs. The EAC further supports the replacement of the current method performance criteria with these revised criteria in the corresponding sampling plans within the *General Standard for Contaminants and Toxins in Food and Feed* (CXS 193-1995).

However, the EAC wishes to raise a technical concern regarding using a fixed ratio of AFB1: AFB2: AFG1: AFG2 at 1:1:1:1 as assumed in some sampling plan applications or method validation discussions.

RATIONALE

Adopting a criteria-based approach for aflatoxin analysis ensures the required method performance, such as limits of quantification, recovery, and precision, without prescribing specific laboratory procedures. This flexibility allows laboratories to implement any validated or officially recognized method that meets the established criteria, accommodating technological advances without frequent method revisions. Most laboratories already employ standardized or validated assays for aflatoxin detection; aligning the numeric performance requirements in CXS 193 with CCMAS-endorsed criteria (CXS 234-1999) will streamline compliance, maintain analytical robustness, and improve consistency across regions.

Based on scientific evidence and regional surveillance data, the relative prevalence of individual aflatoxin subtypes, particularly AFB1, is highly variable across commodities and environmental conditions. AFB1 is frequently the dominant toxin detected in maize, groundnuts, and other staple crops, while AFB2, AFG1, and AFG2 may be absent or present in significantly lower concentrations.

The EAC therefore recommends that the performance criteria allow flexibility in the assumed ratios of aflatoxin subtypes used in method validation or interpretation of results. Specifically: -

- The 1:1:1:1 ratio should not be used as a default or expected distribution in routine monitoring and enforcement.

- Method validation should accommodate realistic concentration ranges and occurrence patterns of the individual aflatoxins, with particular attention to AFB1 as the most toxicologically significant and commonly detected subtype.
- Guidance or footnotes could be included in the performance criteria document to clarify that the ratio is not prescriptive and may vary based on commodity, region, and sampling conditions. Such an approach would better reflect real-world contamination profiles, improve method applicability across diverse settings, and support more accurate risk assessment and regulatory compliance, particularly in developing countries with aflatoxin-prone commodities.

Agenda Item 19: Review of Codex standards for contaminants

GENERAL COMMENT

The EAC acknowledges and supports the ongoing work of the CCCF to review and update standards and Codes of Practice that were adopted or last revised more than 15 years ago, particularly those related to staple foods and economically important commodities in the region. The EAC, take note of the recent updates to Lists A and B and the Overall Highest Priority List (OHPL) and strongly supports the inclusion of updated aflatoxin-related standards, which are of particular relevance to Africa due to climatic and storage conditions that increase the risk of contamination.

SPECIFIC COMMENT

The EAC recommends the inclusion of the following contaminants in the final OHPL, prioritized as follows:

1. Re-evaluation of total aflatoxins: Maize grain (destined for further processing), maize flour/meal/semolina/flakes , Husked and polished rice , Sorghum grain (for further processing), Cereal-based foods for infants and young children (both general and food aid-specific) , Chili pepper, dried nutmeg.

Rationale: Maize, rice, sorghum, and cereal-based foods are dietary staples in most African countries and are widely consumed across the East African region. Aflatoxin contamination in these commodities poses a significant public health concern, particularly for vulnerable populations such as infants and young children. In line with the conclusions of the CAC45 and the recent global call for data, the EAC supports further re-evaluation of total aflatoxins.

2. Re-evaluation of cadmium in polished rice, wheat, pulses, and cereal grains

Rationale: Polished rice, wheat, pulses, and cereal grains are staple foods in the East African region and form a significant part of the population's daily diet. Cadmium levels in these commodities should be re-evaluated in the context of evolving agricultural practices, changing soil conditions, and updated dietary exposure data. The current MLs, particularly for cadmium in polished rice, were established over 25 years ago and may no longer reflect the present-day risk profile. A reassessment is necessary to ensure continued consumer protection and alignment with the latest scientific evidence.

3. Re-evaluation of Code of Practice for the reduction of aflatoxin B1 in raw materials and supplemental feeding stuffs for milk-producing animals (CXC 45-1997).

Rationale: The existing CoP (CXC 45-1997) is outdated and does not adequately address current and emerging risks, including the use of new feed ingredients, climate change impacts on aflatoxin occurrence, and advancements in feed safety management practices. A thorough revision is necessary to incorporate updated scientific knowledge and practical approaches to aflatoxin control, thereby ensuring food safety at the farm level and protecting public health through the dairy value chain.

4. Re-evaluation of CoP for Tin, Total – MLs in Containers Other Than Tinplate (CXC 60-2005).

Rationale: MLs for tin in non-tinplate containers were last revised in 1981. New food contact materials such as plastics, glass, and composite packaging require updated risk assessments for tin migration and consumer exposure

5. Re-evaluation of CoP for the Prevention and Reduction of Ochratoxin A (OTA) Contamination in Coffee (CXC 69-2009).

Rationale: Coffee is a major export crop in East Africa region. Improvements in post-harvest handling, storage, and transportation offer significant opportunities to reduce contamination with Ochratoxin A (OTA). An updated CoP would help ensure the adoption of best practices aligned with the latest scientific developments, thereby enhancing food safety and protecting trade interests.

6. Re-evaluation of CoP for the Reduction of polycyclic aromatic hydrocarbons (PAH) Contamination from Smoking and Direct Drying Processes (CXC 68-2009).

Rationale: Traditional smoking and drying techniques remain prevalent in East African. While culturally important, these practices may contribute to PAH contamination. Traditional smoking and drying techniques remain widely used across East Africa. While these methods hold cultural significance, they have been associated with increased levels of PAHs, which pose food safety concerns. Revising the existing guidance would support the reduction of PAH contamination while acknowledging and accommodating traditional food preparation practices. Furthermore, The EAC supports the retention of the ML for aflatoxins in peanuts intended for further processing under the Overall Highest Priority List (the “OHPL”) category, due to its ongoing public health relevance and importance for intra-regional trade.

Agenda Item 21: Priority list of contaminants for evaluation by JECFA

GENERAL COMMENT

The EAC acknowledges the importance of regularly reviewing and updating the priority list of contaminants for evaluation by JECFA to ensure continued protection of public health and to facilitate fair practices in international food trade. The EAC supports prioritizing contaminants based on their public health relevance, data availability, potential trade impacts, and alignment with the Codex Strategic Plan and the terms of reference of both CCCF and JECFA. The EAC has no proposals but supports the existing contaminant priority list as concluded at CCCF17.

The EAC further requests that targeted support be provided through FAO/WHO initiatives, regional projects, or twinning arrangements with more experienced counterparts to enhance developing countries' ability to submit comprehensive dossiers. Such mechanisms would significantly improve these countries' capacity to contribute data and submit dossiers on contaminants of national and regional concern in future Codex engagements.