

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 6, 11, 16

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ORIGINAL LANGUAGE ONLY

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

Bangkok, Thailand
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COMMENTS OF INSTITUTE OF FOOD TECHNOLOGISTS (IFT)

IFT thanks the CCCF for the opportunity to comment on agenda items 6, 11 and 16 in the 18th session of CCCF.

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

IFT supports the development of a Code of Practice for reducing and mitigating cadmium in foods. Since cadmium is a naturally occurring as well as anthropological contaminant, the use of the term “prevention” can be misleading, as naturally occurring cadmium in foods can be mitigated and reduced, while not prevented, whereas human environmental contamination can be prevented. IFT believes it would be prudent to change the terminology to “mitigation and reduction” versus the current “prevention and reduction” to be more accurate to the overall situation.

IFT would also like to highlight two additional considerations regarding cadmium mitigation in agriculture and manufacturing that are not explicitly mentioned in the current draft COP and that we would encourage them to be included. Within the agricultural mitigation practices, we would encourage inclusion of soil microbiome modification as a tool to use to promote mitigation. Technology now exists to enhance soil with microbes that can reduce cadmium uptake by a variety of cadmium uptake susceptible plants. Regarding the manufacturing/processing mitigation portion, IFT would encourage inclusion of sorting technologies (e.g., near infrared scanning) that food materials can be put through to enable identification and separation of higher cadmium content food material from lower content, thereby enabling either sorting or removal of high level cadmium content foods. This can be particularly beneficial in manufacturing foods likely to be consumed by the most vulnerable populations to cadmium health effects (infants, young children, pregnant women). IFT resources on heavy metals in food in support of these points:

[IFT Discusses How to Reduce Heavy Metals in Food in New White Paper - IFT.org](#)

[IFT Heavy Metals Content Collection - IFT.org](#)

Agenda Item 11: Review of the Code of practice for the reduction of acrylamide in foods (CXC 67-2009)

IFT supports the effort to update the COP for the reduction of Acrylamide in food, taking into account new learnings since the original adoption in 2009. Maintaining framing as a non-prescriptive guidance document is key, to ensure the most appropriate mitigation tools can be leveraged for the widely varying foods, and food production and preparation processes within different food categories. IFT believes the latest draft document is an improvement, focused on reduction tools and removing the word ‘prevention’ from the title, recognising that acrylamide is formed during usual cooking and preparation processes, and while it can be reduced it cannot be completely removed. As a further build, IFT would encourage the committee to consider in the COP the broader arena of foods prepared and cooked within food service establishments (restaurants, street vendors, etc.) and at home, also important components of acrylamide intake. These two areas have not been addressed explicitly in the COP and IFT would encourage discussion to address these important contributions to dietary exposure, where acrylamide development could be further mitigated. We see how large companies have leveraged mitigation tools, whereas smaller operators and establishments that locally prepare and cook foods may be unaware of acrylamide. Dietary exposure from those sources maybe more significant contributors for many consumers. Wider education would seem appropriate to further help mitigate risks from acrylamide in food.

Agenda Item 16: Application of maximum levels to multi-ingredient products

IFT has significant concerns about the approach being used to set ML's for multi-ingredient products. While the initial focus of the work has been aimed at spice blends, there are many other types of multi-ingredient foods that could be impacted by this work, as a precedent, that could make evaluation of ML's more complex. Therefore, IFT would like to see limitations set on the scope of work regarding multi-ingredient foods (e.g., limited to spice blends). IFT believes it is best in the case of multi-ingredient blends that the source country manufacturer adheres to the ML's for individual components as the primary mechanism for controlling against particular contaminants of concern. Additionally, we anticipate problems for enforcement, where the mechanism for analytical evaluation of a blend requires disclosure, regarding proprietary blend information. A methodology developed by CCMAS that does not require such disclosure would be needed to ensure proper enforcement, which in the case of blends could be difficult. Therefore, we continue to believe it is best for evaluation to be done by the manufacturer at the country of origin to adhere to the individual component Codex ML requirements and to stipulate that they have met them as part of certification process.