

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 9, 10, 12, 13, 15

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ORIGINAL LANGUAGE ONLY

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

Bangkok, Thailand
23-27 June 2025

COMMENTS OF GHANA

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

Position:

Ghana supports the New MLs for lead in dried bark and in dried culinary herbs at 2.5 mg/kg at Step 5 as proposed by the Electronic Working Group

Rationale:

- i. The new MLs are based on the ALARA principle to ensure public health protection with minimal impact on trade, as rejection rates for the proposed MLs are less than 5%, the cut-off level agreed upon by CCCF
- ii. The new MLs are based on data available in the GEMS/Food database, including a considerable amount of additional data submitted in response to the JECFA call for data issued in June 2024
- iii. The new MLs take into consideration recommendations made by CCCF17, especially the inclusion of some missing data in CX/CF 24/17/53, exclusion of the outlier and the comparison between the 8 data submitted after the last JECFA call for data on June 2024. It further considers data submitted before that to assess the possibility to identify adulterated results, as well as broad discussions around MLs for lead in dried spices and culinary herbs.
- iv. The new MLs aim to reduce lead exposure in diet and support fair trade practice

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

Position:

Overall Structure and Content of the CoP:

Ghana endorses the CoP's comprehensive approach, which integrates risk management practices from soil testing to post-harvest handling to prevent cadmium entry into the food chain. Annex on Seaweed (Annex I) and Rice (Annex II):

Ghana supports developing Annex I, provided the availability of relevant data: In coastal regions (e.g., West and East Africa), seaweed is an emerging food source given that seaweed is an emerging food source in some African countries.

Ghana further supports the development of an Annex on reduction of cadmium contamination in rice. Cocoa Beans CoP (CXC 81-2022) as Annex: Ghana does not oppose converting the CoP for the reduction of cadmium contamination in cocoa provided the technical content of the document is not changed.

Re-establishment of the EWG:

Ghana supports re-establishing the EWG to refine both the general CoP and commodity-specific annexes.

Rationale:

Cadmium contamination poses a significant health risk in many African communities, particularly through staple crops such as rice and maize, as well as emerging commodities like seaweed. A harmonized, evidence-based Code of Practice (CoP) with both general provisions and commodity-specific annexes will help African producers adopt realistic mitigation measures across all production scales, from smallholder farms to medium-sized processors.

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)

Position:

Ghana acknowledges and appreciates the efforts of the Electronic Working Group (EWG). Ghana 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 many African countries, 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 economies.

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.

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

Position:

Ghana 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). Ghana 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, Ghana 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) 12 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.

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)*

Position:

Ghana appreciates the efforts of the Electronic Working Group (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. Ghana also endorses the advancement of this work through the Codex stepwise process. Additionally, it advocates for the integration of related Codes to prevent overlap, inconsistencies, and redundancies.

Rationale:

Given the time elapsed since the development of CXC45, it is timely to update the standard with emerging information on aflatoxins management. This revision will help ensure the safety of raw materials used in feed for milk-producing animals, ultimately contributing to the production of safe milk for human consumption. Aflatoxins can significantly

impact public health and there is also new scientific data/information to support this work. Aflatoxins can cause acute and chronic health effects, including liver damage and immune suppression and increased risk of liver cancer. Children and individuals with compromised immune systems are particularly vulnerable. Aflatoxins contamination can also restrict trade, hence reducing its contamination is essential for safeguarding public health, ensuring food safety, and facilitating trade. Harmonization of the CoPs fosters consistent aflatoxins control across commodities.

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

Position:

Ghana supports the development of a Code of Practice for tropane alkaloids 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.

Rationale:

Tropane alkaloids (TAs) such as atropine and scopolamine are highly toxic contaminants in cereals, spices, and related foods, originating from co-harvested weeds. The 2020 FAO/WHO Expert Meeting highlighted acute health risks at very low exposure levels and noted inconsistencies in sampling and detection methods. A harmonized Code of Practice will provide standardized guidance on farm-level weed control, validated sampling and analytical protocols, processing steps to reduce TAs, and risk communication for traders and regulatory authorities. Submitting this revised draft Code to the CCCF is the necessary step to establish maximum levels, align with Codex standards, and ensure consistent implementation across countries.

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

Position:

Ghana supports the replacement of the current method of performance criteria in the sampling plans for peanuts destined for further processing, ready-to-eat nuts, and nuts intended for further processing: almonds, hazelnuts, pistachios, shelled Brazil nuts, and dried figs with the standard for contaminants from the General Standard for Contaminants in Foods for Human and Animal Consumption (CXS 193-1995). Continue the work and provide more details on the sum of component (1:1:1:1) must consider the health impact, for example, the LM for AB1 should not be equal to the others.

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. These 16 flexibilities allow 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.