CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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**Agenda Items 6, 8, 9, 10, 12, 14** **CF18/CRD37**

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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 ZAMBIA

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

**Background:**

The 17th Session of the Codex Committee on Contaminants in Foods established an Electronic Working Group (EWG) to prepare a Code of Practice (CoP) for preventing and reducing cadmium contamination in foods. The Electronic Working Group (EWG) was established to review comments and scientific information on CL 2024/26-CF1 and drafts of the CoP, involving input from various countries. The CoP addresses mitigation measures in agriculture, aquaculture, drinking water, food ingredients, processing, packaging, and consumer practices, with unique information presented in annexes. This work builds on previous cadmium work, specifically the Code of Practice for cocoa bean contamination prevention, following EU and Japan's recommendations to consider a code of practice before reviewing cadmium maximum levels.

The EWG incorporated information into the CoP, suggesting risk management practices and developing commodity-specific mitigation measures, including rice and seaweed annexes, with further discussion needed. CCCF17 is working on a CoP to address cadmium levels in seafood, recommending regional mitigation measures, consumer advice, and regional standards.

The CCCF is requested to review the proposed CoP for reducing cadmium contamination in foods, assess seaweed and rice annexes, explore other commodities, and consider converting the Code of Practice for cocoa beans into an Annex.

**Position:**

Zambia thanks the United States for leading this work and supports the continued development and refinement of the draft Code of Practice (CoP) for the Prevention and Reduction of Cadmium Contamination in Foods and offers the following Positions:

1. Structure and Content of the CoP:

   Zambia welcomes the comprehensive structure and science-based content of the draft CoP. It provides a practical and harmonized framework for managing cadmium risks in food, which is relevant to National context. We support the integration of additional data and proven risk management practices, particularly those adaptable to small- and medium-scale producers.

2. Development of Annexes on Seaweed and Rice:

   Zambia supports the continued development of the annexes on seaweed and rice, noting the growing importance of these commodities in Zambian diets and economies. We encourage further incorporation of regionally relevant data and mitigation practices to ensure the annexes are globally applicable and effective across production scales.

3. Zambia supports the conversion of the Code of Practice for the Prevention and Reduction of Cadmium Contamination in Cocoa Beans (CXC 81-2022) into an annex under the broader Code of Practice on cadmium contamination in foods. This approach will enhance coherence and ensure that all commodity-specific guidance is housed within a unified framework.

4. Re-establishment of the Electronic Working Group (EWG):

   Zambia supports re-establishing the EWG to continue refining both the general provisions and commodity-specific annexes. This will allow for the integration of additional data, technical inputs from diverse regions, and alignment with best practices.

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

**Position**

Zambia acknowledges and appreciates the efforts of the Electronic Working Group (EWG) led by India and the United States in preparing the draft proposal on a maximum level (ML) and associated sampling plan for total aflatoxins in ready-to-eat (RTE) peanuts.

While Zambia shares the objective of protecting public health and promoting fair trade, it recognizes the concerns also raised by other members regarding the data limitations, concerns related to methodological transparency, and potential trade implications of the proposed ML of 10 µg/kg for total aflatoxins in RTE peanuts.

Zambia proposes the following:

1. Defer adoption of the 10 µg/kg ML until:
   - The revised Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004) is finalized and implemented.
   - New comprehensive occurrence data (2017–2024) are collected and analyzed, including from all Codex regions.
   - A more representative data analysis is completed in line with the guidance in CX/CF 25/18/15.
2. Mandate the EWG to continue its work, with clear guidance to:
   - Broaden geographic representation in data collection.
   - Clarify the inclusion criteria for RTE products.
   - Develop a clear, fit-for-purpose sampling plan.
3. Encourage the submission of national data to the GEMS/Food database,

**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**

Zambia the adoption and advancement of the revised *Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004)* through the Codex step process towards final adoption by CAC48. Peanuts are a key food and cash crop in Zambia contributing significantly to nutrition, food security, livelihoods, and trade. Aflatoxins pose serious public health risks and trade barriers, particularly for smallholder producers. The revised CoP, which is based on updated scientific evidence and best practices, will enhance national capacities to manage aflatoxin risks across the peanut value chain. Its adoption will support public health protection, facilitate market access, and promote regulatory compliance.

**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**

Zambia supports the review and revision of the Code of Practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid (PA) Contamination in Food and Feed (CXC 74-2014), and endorses the development of guidance on sampling and analytical performance characteristics for submission of data to the GEMS/Food database.

Pyrrolizidine alkaloids are genotoxic and potentially carcinogenic compounds found in many plant species, posing serious public health risks and food safety challenges. Contamination can occur across various food chains, including honey and animal products, and has implications for both domestic safety and international trade. African Union acknowledges the importance of minimizing exposure to PAs, especially for vulnerable populations such as children. The proposed revisions and analytical guidance, which is aligned with JECFA's risk assessment will strengthen national monitoring, enhance data quality, improve Codex standard development, and support safe trade. Zambia therefore supports advancing this work through the Codex stepwise process.

**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**

Zambia supports the initiation of new work to revise the Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feed for Milk-Producing Animals (CXC 45-1997) and endorses its advancement through the Codex stepwise process. Given the time since its adoption, the revision is timely and necessary to reflect updated scientific knowledge and improved mitigation practices. The presence of aflatoxin B1 in animal feed can lead to contamination of milk with aflatoxin M1, posing serious risks to public health—particularly for vulnerable populations such as children.

Zambia also supports efforts to harmonize this Code with other Codex Codes of Practice for aflatoxins in cereals, peanuts, and tree nuts, to avoid redundancy and ensure consistency in aflatoxin control measures across feed-related commodities. This will strengthen food and feed safety, support trade, and enhance confidence in regulatory frameworks.

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

**Position**

Zambia supports the development of a *Code of Practice (CoP) for the Prevention and Reduction of Tropane Alkaloids (TAs) in Food and Feed* and endorses the advancement of this work through the Codex stepwise process.

Tropane alkaloids are naturally occurring plant toxins found in species such as *Datura*, pose serious health risks including anticholinergic effects that can impact the central nervous system. Contamination can occur during harvesting, processing, and storage, particularly in cereals, herbal products, and animal feed. Given the limited data on post-harvest and preprocessing contamination, developing a CoP that promotes good agricultural and feed management practices is timely and essential.

Zambia recognizes the need for robust control measures to minimize TA contamination and protect vulnerable populations, especially children and individuals consuming herbal and plant-based products. The inclusion of feed control measures is also critical to prevent carryover into animal-derived foods.

Zambia supports the re-establishment of the Electronic Working Group (EWG) to continue this work, with attention to regional data gaps and practical guidance applicable to small- and medium-scale producers. The development of this CoP will support public health protection, enhance food and feed safety, and facilitate compliance with international standards.