



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-fifth Session

FAO Headquarters, Rome, Italy

21-25 November and 12-13 December 2022

Conference Room Document from the Institute of Food Technologists (IFT) regarding the November 21, 2022 CAC Discussion

November 21, 2022

Summary of IFT's Position

The Institute of Food Technologists (IFT), an individual scientific member organization comprised of over 12,000 persons across 95 countries and a Codex Observer organization of over 30 years, would like to provide input to the discussion on aflatoxins in cereals and cadmium in cocoa powder. IFT recognizes the importance of minimizing the consumption of food contaminants. Likewise, IFT also understands that it is impossible to completely eliminate such contaminants in the food supply, as the USA FDA has recognized with its Closer to Zero program aimed at a continuous process to minimize the impact of toxic elements in food. Therefore, it is crucial to both set limitations on the amounts of known harmful contaminants as well as strive for continuous reduction in such contaminants over time for the beneficial health impact.

IFT believes the following points are important to consider regarding the two topics that the CAC members, the FAO Food Safety representative and CCCF chairperson contributed during the Monday session:

For both aflatoxins in cereals and cadmium in cocoa powder:

- It is most crucial to minimize the consumption of aflatoxins and cadmium for the most vulnerable, infants and young children, by virtue of their low body mass and high food intake rates. Hence, ML's for them should generally be set lower than for the general population.
- The JECFA assessments for both topics are well grounded scientifically, and should be respected as a basis for setting ML's for the general population.
- As no ML's exist currently in either case, IFT agrees with the CCCF Chairperson position that it is imperative to take this opportunity to set an ML for these products with the understanding that it will be reviewed at some fixed point in time in the future (e.g., 5 years or less) or as significant new scientific information becomes available for a renewed JECFA assessment.
- Sending the issue back to CCCF for a review will delay the setting of an ML minimally by 1-2 years and therefore does not help protect anyone in the member countries during that time period. IFT believes it is better to adopt the current proposal with the acknowledgement that it should undergo additional review over some agreed upon timeframe that CAC 45 members can align around to reduce levels of these contaminants in global trade.
- Member countries can certainly enforce more stringent standards than the Codex limits within their countries/regions if desired. Not enacting the current proposal allows continued global trade with no globally aligned ML's.

Specific to Aflatoxins

- IFT agrees that high consumption frequency (e.g., maize in some countries, husked rice in others) is a concern, but that it has been taken into account per JECFA in their assessment.
- The separate, higher ML for use in product for food aid is practical if the food aid period is less than 12 months. Beyond that, food aid delivered to the same locale becomes an increasingly heightened risk versus the nutritional support benefit. Therefore, IFT believes a limit on the length of time food aid is delivered at a higher aflatoxin level might be advisable.
- As more scientific research is conducted regarding aflatoxin impact on infants and young children and new health impact data becomes available, IFT believes it would be useful for CCCF to revisit the topic.

Specific to Cadmium in Cocoa Powder

- IFT would remind the CAC members that the variation in soil from various regions is a primary cause of differences in cadmium levels in cocoa powder and puts some regions at risk for cocoa production if too stringent a ML is sought. Hence, the proposed ML takes this issue into consideration as the FAO representative explained with the ALARA guidance.
- Cadmium has a very long retention time in the human body (studies indicate 15+ years) and has the most negative health impact on infants and young children. Therefore, IFT recommends products designed for this most vulnerable demographic would benefit from implementation of the proposed standard versus there being none. Additionally, IFT would recommend that CCCF consider development of a more stringent standard for cocoa powder used in products for this most vulnerable age range.
- While cadmium in cocoa powder is a concern due to the popularity of cocoa/chocolate and the globally significant trade related to it, the quantity of cadmium ingested via other food sources in the diet is also a major concern for CCCF to continue to address.

Overall, IFT supports moving forward with the proposed standards for aflatoxins in cereals and for cadmium in cocoa powder, as IFT believes that not proceeding with the proposals is of more detriment to global food safety than the difference in ML levels being discussed. Again, for both aflatoxin and cadmium in cocoa powder, IFT would suggest setting a timeframe for reviewing new data on the topics to ensure Codex standards for global food trade in these products moves forward with a continuous effort to re-evaluate and reduce health risks based on new scientific data.

IFT thanks the Codex Secretariat and Chair for inclusion of this CRD for consideration by CAC 45.