

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Items 5, 6, 7, 8, 9, 11, 13, 14, 15, 17, 18

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

**17th Session
15-19 April 2024**

Comments submitted by India

Agenda Item 5: Maximum levels for lead in certain food categories (at Step 4)

India appreciates the work done by Brazil as the chair of the EWG. India would like to propose evaluation of MLs considering the whole category or only specific spices for which data is available in the GEMS/ Food database. India suggests for consideration of call for additional data for the following reasons:

1. Inclusion of data from producing countries i.e. Geographically representation data
2. Increase the number of samples for consideration in establishment of ML

Rationale:

India would like to highlight the following points regarding the proposed MLs in paragraph 1.1 of the Appendix I:

1. Data considered for the establishing ML is majorly from importing countries rather than the producing countries.
2. The submitted data is having limited geographical representation
3. Number of samples considered for each type of spices is very small
4. There is lack of occurrence data in specific spices

Agenda Item 6: Sampling plans for methylmercury in fish (at Step 4)

India appreciates and supports the work done by Nea Zealand and Canada as the chair and Co-chair of the EWG respectively in the preparation of the Sampling plans for methylmercury in fish.

Agenda Item 7: Definition for ready-to-eat peanuts for the establishment of a maximum level for total aflatoxins in this product

India expresses its sincere gratitude to the chair and EWG members for their contribution and supports the proposed definition for ready-to-eat peanuts for the establishment of a maximum level for total aflatoxins in this product.

Agenda Item 8: Sampling plans for total aflatoxins and ochratoxin A in certain spices (at Step 4)

India expresses its sincere gratitude to the chair and EWG members for their contribution and supports the proposed sampling plans for total aflatoxins and ochratoxin A in certain spices.

Agenda Item 9: Code of practice/guidelines for the prevention and reduction of ciguatera poisoning (at Step 4)

India welcomes and supports the work done by chair of the EWG United States of America and Co-chairs - France, Panama and Spain for drafting the Code of practice/guidelines for the prevention and reduction of ciguatera poisoning.

Agenda Item 11: Discussion paper on tropane alkaloids in foods

India appreciates the work done by the China as chair and Saudi Arabia as Co-chair of the EWG. India would like to support the recommendation of revising the existing Code of practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed (CXC 74-2014) to extend the scope to include Tropane Alkaloids as the Good Agricultural Practices are common for alkaloids producing weeds.

Agenda Item 13: Request for comments on the recommendation for the establishment of maximum levels for cadmium and lead in quinoa

India appreciates the work done by JECFA Secretariat. India supports the recommendation of extending the current MLs for cadmium and lead in cereal grains to quinoa. Thereafter, the same may be reviewed based on the risk assessment.

Agenda Item 14: Review of the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004)

India appreciates the work done by Brazil. However, India proposes that the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004) may be revised after the establishment of ML for RTE Peanuts.

Agenda Item 15: Review of the Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feedingstuffs for Milk-Producing Animals (CXC 45-1997)

India welcomes the work done by Canada as chair and Japan and United States of America as Co-chair of the EWG in the revision 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). India proposes to delete the term “animal-derived” and the same should be corrected wherever used in the document.

Rationale:

The usage of the term “animal derived milk and milk products” implies that there would be possibility of using the term non-animal derived milk and milk products which would contradict the definition of milk. The Codex General Standard for the Use of the Dairy terms (CXS 206-1999) defines milk as the normal mammary secretion of milking animals obtained from one or more milkings without either addition to it or extraction from it, intended for consumption as liquid milk or for further processing.

Agenda Item 17: Guidance on data analysis for development of maximum levels and for improved data collection

India appreciates the efforts made by European Union as chair and Japan, the Netherlands and United States of America as co-chair in developing the Guidance on data analysis for development of maximum levels and for improved data collection. India suggests that the data from the imported samples should not be considered as geographically representative data and should not be included in the data analysis while establishing the ML.

Rationale:

Data from import sample may not be geographically representative as the FBO should have done all regulatory confirmative measures so as to comply with the regulatory requirements of importing country and its analytical data would reflect very low levels of contaminants.

Agenda Item 18: Review of Codex standards for contaminants

India does not support the inclusion of Aflatoxin M1 in milk in the overall highest priority list (OHPL).

Rationale:

The outcome of the JECFA evaluation of Aflatoxin M1 in 2001 states that:

“Using worst-case assumptions, the additional risks for liver cancer predicted with use of proposed maximum levels of aflatoxin M1 of 0.05 and 0.5 µg/kg are very small. The potency of aflatoxin M1 appears to be so low in HBsAg- individuals that a carcinogenic effect of M1 intake in those who consume large quantities of milk and milk products in comparison with non-consumers of these products would be impossible to demonstrate.”

In this regard, a ten times reduction in the ML of Aflatoxin M1 in milk would have no advantage in terms of food safety. However, reduction in the ML may become a trade barrier and it would also be an undue burden on the time and resource available with the CCCF. Therefore, India proposes not to include Aflatoxin M1 in Milk in the priority list of contaminants to be reviewed in future.