

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 5, 6, 7, 8, 9, 15, 16

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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 Ghana*

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

Commodity/ Product Name	Maximum Level (ML) mg/kg	Portion of the Commodity/Product to which the ML applies	Remarks/Position
Spices, dried barka (Cinnamon, canella, cassia)	2.5	whole, ground, powder, crushed	Ghana does not support adoption of the ML of 2.5mg/kg. We support ML of 2mg/kg or lower given the public health concern of lead
Spices, dried flowers (Chamomile flower)	0.4	whole, ground, powder, crushed	Ghana supports adoption of the proposed ML
Spices, dried floral parts (Saffron, Cloves, Capers)	2.5	whole, ground, powder, crushed	Ghana does not support adoption of the ML of 2.5mg/kg. We however support ML of 2mg/kg or lower given the public health concern of lead
Spices, dried fruits and Berries (Star Anise, Cardamom, Cayenne, Black pepper, Green pepper, White pepper, Pink pepper, Red pepper, Paprika, Peppers chilli, Pimento, Tamarind, Sumac, Vanilla)	0.6	whole, ground, powder, crushed	Ghana supports adoption of the proposed ML
Sichuan pepper	3.0	whole, ground, powder, crushed	Ghana recommends that the ML be held at step 4 due to lack of geographical representativeness of the data used to derive this ML. More data is required to enable the establishment of ML that is geographically representative.
Spices, dried rhizomes, bulbs and roots (Ginger, Turmeric)	2.0	whole, ground, powder, crushed	Ghana supports adoption of the proposed ML
Spices, dried seeds (Anise seed, Coriander seed, Cumin seed, Dill seed, Fenugreek seed, Fennel seeds, Mustard, Nutmeg)	0.8	whole, ground, powder, crushed	Ghana supports adoption of the proposed ML

Spices, dried aril (Mace)	0.9	whole, ground, powder, crushed	Ghana supports adoption of the proposed ML
Fresh culinary herbs	0.2	Whole commodity	Ghana supports adoption of the proposed ML
Dried culinary herbs	2.5	Whole commodity	Ghana does not support adoption of ML of 2.5mg/kg. We however support ML of 2mg/kg or lower given the public health concern of lead

**Rationale:** Ghana's support for a lower range of Maximum Levels is due to significant health risks associated with Lead exposure and poisoning on public health and the impact thereof. Our national standards do not support maximum levels greater than 2mg/kg.

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

**Position:** Ghana supports adoption of the sampling plans at Step 5 to offer opportunity to other members to provide necessary information and data that will aid in arriving at a comprehensive sampling plan.

**Rationale:** By developing a well-designed sampling plan for Methyl Mercury in fish, there could be an effective monitoring of contamination levels, assessment of potential risks to human health and environment and implementation of appropriate mitigation measures to protect public health and ensure Food Safety.

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

**Position:** Ghana supports the revised definition of peanut which is as follows: Ready-to-Eat Peanuts is a product intended for direct human consumption, not intended to undergo an additional processing/treatment that has proven to reduce levels of aflatoxins, before being used as ingredients in foodstuffs, otherwise processed, packed in all types of packaging such as consumer or bulk, labeled as 'RTE Peanuts'. Includes, but not restricted to: (i) raw shelled peanuts, (ii) raw in-shell peanuts, (iii) roasted in-shell peanuts, (iv) roasted/blanched shelled peanuts, (v) fried shelled peanuts with or without skin, (vi) coated peanuts, (vii) seasoned peanuts, (viii) smoked peanuts, (ix) salted and cooked peanuts, (x) peanut butter.

Ghana also agrees with the following recommendations of the EWG:

- CCCF should consider and agree on the proposed definition for RTE Peanuts (Appendix I) considering the discussions and rationale of the EWG;
- request the GEMS/Food administrator to issue a call for AFT occurrence data in RTE Peanuts as defined; and
- re-establish the EWG, chaired by India, to further elaborate the ML for AFT in RTE peanuts as defined (in accordance with phase 2 of the work on MLs for AFT in RTE peanuts).

**Rationale:** Peanuts play an important food security and nutritional role in Ghana. They are grown in several African countries and are important for both subsistence and commercial purposes providing nutrition and income for many farmers across the continent. Peanuts are used in various dishes and products in Ghana and they also play a significant role in our local economy through exportation. Therefore, it is imperative that appropriate definition and limits are set to protect the health of the consumers while facilitating fair trade. Overall, setting limits for aflatoxins is essential to safeguard public health, ensure Food Safety, facilitate trade and protect consumers from harmful effects of these toxins and also for regulatory compliance.

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

**Position:** Ghana supports progression of the document to Step 5 to allow more time to review the document and provide the additional information to refine the plan.

**Rationale:** We support the progression of the document to Step 5 to allow other countries to review the document and provide comments and make more observations.

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

**Position:** Ghana supports the adoption of the Code of Practice for the prevention or reduction of Ciguatera poisoning. Ghana also supports its advancement in the step-wise procedure.

**Rationale:** Ciguatera poisoning has become a global health issue and is increasing in prevalence due to factors that include climate change. Coastal communities that rely on fishing as source of food supply and income are mostly at risk from increasing occurrences of ciguatera poisoning.

Hence developing a CoP on the prevention or reduction of ciguatera poisoning will protect human health and promote trade.

**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)**

**Position:** Ghana supports new work on the Code of Practice for the reduction of Aflatoxin B1 in raw materials and supplemental feeding stuffs for milk-producing animals and also support its advancement in the step process.

**Rationale:** Aflatoxins can significantly impact public health, Aflatoxins contamination can also restrict trade, hence reducing its contamination is essential for safeguarding public health, ensuring food safety, and facilitating trade.

**Agenda Item 16: Development of a Code of practice for the prevention and reduction of cadmium contamination in foods**

**Position:** Ghana supports the development of the CoP for the Prevention and Reduction of Cadmium contamination in foods.

**Rationale:** Development of the Code of practice for prevention and reduction of cadmium contamination in foods will complement the already existing code of practice on prevention and reduction of cadmium in cocoa. This work is important for Ghana since it will strengthen the current measures in ensuring protection of the consumer health and facilitation of trade.