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ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 16th SESSION OF THE CODEX COMMITTEE ON CONTAMINANTS IN FOOD (CCCF16)

18 to 21 April 2023 (physical plenary meeting)

26 April 2023 (virtual report adoption)

AGENDA ITEM 8: MAXIMUM LEVEL FOR TOTAL AFLATOXINS IN READY-TO-EAT PEANUTS AND ASSOCIATED SAMPLING PLAN (AT STEP 4)

OBJECTIVES

This document offers a review and analysis of the agenda items planned for discussion at the 16th session of the **Codex Committee on contaminants in Foods (CCCF16)**, scheduled to take place face to face from 18 to 21 April 2023 (physical plenary meeting) and 26 April 2023 (virtual report adoption). This document is intended for possible use by the Codex communities of practice, promoted by [GForSS](#) and [PARERA](#), as part of their contribution to enhancing awareness and supporting effective participation in international food standard setting meetings (Codex meetings) by representatives from members and observers.

The analysis provided in this document offers a factual review of agenda items, their background and a discussion of some considerations. This analysis is indicative in nature and does not represent an official position of the organizations mentioned above ([PARERA](#) and [GForSS](#)), their membership or their management. It provides a synthesis and analysis of the work currently under discussion by the CCCF, which may be useful for delegations from Arab countries to prepare their positions considering the needs and specificity of the region and the potential impact of the proposed food standards.

This analysis is prepared as part of the **Codex Initiative for the Arab Region: Arab Codex Initiative**, implemented by [PARERA](#) and [GForSS](#), hosted and coordinated by the [Arab Industrial Development, Standardization and Mining Organization \(AIDSMO\)](#) and funded by the US Codex Office, US Department of Agriculture.

**It is important to note that experts – members of the Expert Working Group (EWG) – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the EWG proceedings is based on each expert's own credentials and experience which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

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

Document

- ❖ CX/CF 23/16/8

CCCF16 is invited to postpone this agenda item to CCCF 17(2024) for further consideration

Background

- ❖ JECFA83 (2016) considered that enforcing an ML of 10, 8 or 4 µg/kg would have little further impact on reducing dietary exposure to aflatoxins in the general population as compared to an ML of 15 µg/kg; and that the recommendations were consistent with the approach taken for the ML for AFT in RTE peanuts (10 µg/kg) and peanuts for further processing (15 µg/kg), i.e., a lower ML for the RTE than for the commodity intended for further processing.
- ❖ CCCF12 (2018) had agreed to hold the proposed ML of 10 µg/kg at Step 4 to ensure implementation of the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55 – 2004) and to issue a call for data in three years' time.
- ❖ At CCCF14 (2021), the committee agreed to re-establish the EWG led by India to reconsider new/additional GEMS Food data and to prepare revised proposal for an ML for RTE peanuts and associated sampling plans for consideration by CCCF15 (2022) considering the new and old datasets available on GEMS/Food.
- ❖ At CCCF15 (2022) agreed : (i) to return the maximum level (ML) and associated sampling plan to Step 2/3 for further consideration; (ii) to re-establish the electronic working group (EWG) chaired by India and co-chaired by Senegal to prepare: (a) new proposal for an ML for total aflatoxins (AFT) in ready-to-eat (RTE) peanuts; and (b) an associated sampling plan applying the same principles for the sampling plan for peanuts intended for further processing in the Standard for Contaminants in Food and Feed (CXS 193-1995).

Analysis

- ❖ The scope of the EWG was to recommend ML of AFT in RTE Peanuts based on segregated data points available in GEMS/Food after implementation of the Code of practice for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004).
- ❖ Segregated GEMS/Food data was provided by the WHO GEMS/Food Administrator to the EWG mentioning that only 250 data points available in GEMS/Food database would be suitable for RTE Peanuts ML setting. The analysis of the 250 data points could not be carried out as member country/ geographical region wise break up of AFT occurrence in RTE Peanuts shared by WHO was unavailable and the majority of the occurrence data was excluded.
- ❖ CCCF16 is invited to consider the following: (i) Member countries to submit RTE Peanut AFT occurrence data to GEMS/Food after implementation of the Code of practice for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004) for the years 2019 onwards, if not yet submitted, to enable the WHO GEMS/Food Administrator to provide segregated RTE Peanut occurrence data country/geographical region wise.

Comments and Considerations raised during CCCF15

- ❖ Those delegations opposed to the proposed ML of 10 µg/kg made proposals for either a lower ML or an ML of 15 µg/kg (the same ML for peanuts intended for further processing).
 - **Those in favor of a lower ML than 10 µg/kg** made the following observations:
 - There was already an ML of 15 µg/kg for peanuts intended for further processing and in view of the effective sorting and cleaning procedures as well as other physical treatments a lower ML than 10 µg/kg could be achieved in the interest of public health.
 - An opinion of EFSA issued in 2018 on the health impact if the current level in the EU of 4 µg/kg were revised upwards to 10 µg/kg that this would result in an increase in cancer risk for the European population.

- The ALARA approach should be followed especially for a carcinogen such as aflatoxin.
- Peanuts were widely consumed in their countries, especially also by children and a higher level would put vulnerable consumers at risk.
- **Those in favor of an ML of 15 µg/kg** expressed the following views:
 - The current data supported an ML of 15 µg/kg, and an ML of 15 µg/kg is health protective,
 - The ML of **10 µg/kg would result in a rejection rate of 8.9%** exceeding the acceptable rejection rate of 5% or lower, as opposed to **the rejection rate of 5.1% for an ML of 15 µg/kg**, (add reference) and a lower ML would have no reduction in exposure according to JECFA83.

Conclusion and Recommendations

- ❖ EWG could not determine a workable conclusion and recommendation to be presented at CCCF16.
- ❖ EWG will present a proposal at CCCF17 (2024) taking into consideration the segregated RTE Peanut AFT occurrence data country/geographical region wise provided by the WHO GEMS/Food Administrator.
- ❖ Monitoring data from Arab countries related to AFT in RTE peanuts should be submitted on Gems/Food database to be considering during the establishment of the ML.
- ❖ Some Arab Countries (e.g., Egypt, Sudan) are producers of peanuts and RTE peanuts. It would be important for these countries to make available monitoring data for the occurrence of AFL in their products and study the impacts that any of the proposed MLs would have on their exports.
- ❖ A possible workable solution could be proposed by Arab delegations as a compromise with the adoption of a value of 10 µg/kg of AFL in RTE peanuts, which would offer a level reduced in comparison to the raw commodities (accounting for some gain in exposure reduction as a result of processing), would in line with ALARA principle and would offer a satisfactory health protection as per the JECFA assessment. (This proposal needs to be validated for its suitability to protect Arab countries exports)