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, 7, 8, 9, 11, 12, 13, 15, 16, 17, 18 CRD……

FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON CONTAMINANTS IN FOODS
18th Session
23/06/2025 - 27/06/2025

Comments submitted by the International Union of Food Science and Technology (IUFoST)

The objective of this Conference Room Document (CRD)[1] is to provide comments on behalf of the International Union of Food Science and Technology (IUFoST), an observer organization of the Codex Alimentarius Commission, on agenda items tabled at the 18th Session of the Codex Committee on Contaminants in Foods (CCCF18).

The International Union of Food Science and Technology (IUFoST) represents the largest gathering of food science and technology scientists from around the world, made of over 300,000 scientists from more than 100 countries.

Agenda Item 5: Maximum Levels for Lead in Certain Food Categories

IUFoST would like to thank the Electronic Working Group (EWG) chaired by Brazil for preparing the document and offers the following comments:

- IUFoST supports the establishment of maximum levels (MLs) for lead in these widely consumed commodities, recognizing the significant health risks associated with exposure to lead, and emphasizes the importance of the ongoing efforts at CCCF18 to achieve consensus on finalizing these maximum levels (MLs), considering their importance in reducing exposure to lead: a key food safety challenge.
- IUFoST supports the application of the ALARA (As Low As Reasonably Achievable) approach to reduce exposure to lead, guided by a target sample rejection rate not exceeding 5%. This approach is particularly important given that JECFA has not established a safe level for lead. IUFoST also commends the use of robust and geographically diverse data sets from the GEMS/Food database covering five WHO regions.

Moreover, IUFoST encourages Codex members and the global food science community to invest in continuous and enhanced data collection on lead occurrence in various food products including in culinary herbs and spices to support future GEMS/Food database updates. It also recommends evaluating the achievability of the proposed maximum levels (MLs) through ongoing national monitoring programs and continuous engagement with the food production sector.

[1] This CRD was prepared by the Group of Experts of the Global Food Regulatory Science Society (GFoRSS), the Disciplinary Group of the International Union of Food Science and Technology (IUFoST).

Agenda Item 7: Sampling Plans and Numeric Performance Criteria for Methods of Analysis for Total Aflatoxins and Ochratoxin A in Certain Spices

IUFoST would like to thank the Electronic Working Group (EWG) chaired by India for preparing the document and acknowledges the significant progress made in the development of harmonized sampling plans for total aflatoxins and ochratoxin A in spices.

IUFoST offers the following recommendations:

1. **Encourage continuous engagement** of member countries, especially those from regions with high spice production and consumption to address unresolved technical issues, including the sampling of powdered spices and numeric performance criteria for analysis.
2. **Promote data collection and sharing** on spice handling, processing, and sampling practices, particularly focusing on powdered spices, to enhance the robustness and representativeness of the sampling plan.
3. **Align national standards** with Codex and ISO definitions related to particle size and sampling procedures to ensure consistency and facilitate international trade.

IUFoST reaffirms its commitment to supporting Codex efforts in developing science-based, practical, and harmonized sampling plans that safeguard public health and promote fair trade globally.

Agenda Item 8: Maximum Level and Associated Sampling Plan for Total Aflatoxins in Ready-to-Eat Peanuts (at Step 4)

IUFoST acknowledges the importance of Codex efforts to establish and revise maximum levels (MLs) for aflatoxins, wherever relevant, to protect public health and support fair trade.

IUFoST appreciates the efforts deployed by the Electronic Working Group (EWG) members towards the development of the Maximum Level for Total Aflatoxins in Ready to Eat (RTE) Peanuts.

However, considering the late availability of the EWG report in support to the discussion of this agenda item, as well as the fact that the data submitted to date, as presented in the report, may require further in-depth analysis, IUFoST considers that the recommendation advanced by the report would require further substantiation and more time to be considered.

Also, and considering the availability of an adopted Codex ML for Aflatoxins in Peanut destined for further processing, the fact that this item has been on the agenda of CCCF for an extended period of time and should the continued challenges to reach consensus persist, IUFoST supports suspending further work on this ML.

The matter may be further revisited in the future with a longer period being given to the implementation of the Code of Practice (CoP) to reduce Aflatoxins in Peanut and the possible availability of new data generated and recorded in accordance with the definition proposed for RTE peanut, at CCCF17.

IUFoST re-emphasizes the importance of data submission to the GEMS/Food database on a regular basis by member countries, supported by their stakeholders. IUFoST remains committed to contributing technical expertise and fostering collaboration to ensure that future decisions are science-based and reflect real-world conditions in production settings.

Agenda Item 9: Revision of the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts

IUFoST welcomes the progress made by the Electronic Working Group (EWG) chaired by Brazil and co-chaired by India on revising the Code of Practice (CoP) for the prevention and reduction of aflatoxin contamination in peanuts.

IUFoST supports advancing the revised CoP to CAC48 for final adoption, given its alignment with the latest scientific developments and practical experiences across regions, and encourages all countries to:

- Use the CoP as a reference for national aflatoxin control programs.
- Apply risk-based measures across the supply chain, with attention to smallholders' practices.
- Invest in training and capacity building for producers and regulators.
- Strengthen infrastructure for drying and storage to reduce contamination risks.
- Promote regional cooperation and data sharing opportunities, related to the implementation of this CoP.
- Support research and innovation to adapt CoP practices to local conditions.

IUFoST reaffirms its support for science-based Codex guidance such as this revised CoP and encourages its adoption and implementation across regions to reduce exposure to aflatoxins, enhance food safety, and promote fair trade.

Agenda Item 11: Review of the Code of Practice for the Reduction of Acrylamide in Foods

IUFoST appreciates the work of the Electronic Working Group (EWG) chaired by India and co-chaired by Saudi Arabia to develop the rationale for the revision of the *Code of Practice (CoP) for the Reduction of Acrylamide in Foods*, in light of recent scientific and technological advancements.

IUFoST supports:

- The revision of the current CoP, in view of the availability of updated mitigation strategies and the technological progress achieved,
- Forwarding the project document for approval as new work to CAC48.
- Re-establishing an EWG to develop a revised, science-based, practical, and widely applicable CoP across diverse food sectors.

Moreover, IUFoST encourages:

- Broad stakeholder engagement, including input from industry and academia, in the revision process.
- Inclusion of regionally adaptable measures to ensure global relevance and feasibility, particularly for small- and medium-sized enterprises.

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

IUFoST supports the new work to revise the Code of Practice for the Reduction of Aflatoxin B1 in Animal Feed, recognizing the importance of integrating new scientific data and improved risk management approaches.

IUFoST emphasizes that advancing this work is crucial to safeguarding public health and supporting international trade through improved aflatoxin control, ensuring it remains relevant, effective, and

harmonized globally. As such IUFoST supports the re-establishment and active participation in the Electronic Working Group (EWG) to refine the revised Code based on current scientific evidence

Further, IUFoST continues to support

- All efforts that may lead to availability of updated national and regional data to strengthen the Code's applicability and robustness.
- collaboration and information exchange to accelerate consensus and practical implementation of the CoP
- capacity-building efforts to facilitate adoption of the revised Code and enhance aflatoxin management across feed supply chains.

Agenda Item 13: Development of a Code of Practice for the Prevention and Reduction of Tropane Alkaloids in Food and Feed

Tropane alkaloids (TAs), such as atropine and scopolamine, pose a food safety risk due to contamination from TA-producing weeds, especially in commodities like herbal infusions, cereals, legumes, and spices, all important worldwide.

IUFoST encourages all stakeholders to actively support and engage in the development of the Code of Practice for the Prevention and Reduction of TA Contamination, emphasizing the need to:

- Develop and/or strengthen monitoring programs to generate region-specific occurrence data, addressing current data gaps.
- Document and share of regional mitigation practices to inform globally relevant and practical guidance.
- Advocate for inclusive, geographically representative data to ensure Codex guidance applies worldwide.
- Invest in Capacity-building efforts to improve detection and analysis of TAs in national food safety laboratories.

These actions will help ensure the Code of Practice is evidence-based, globally relevant, and feasible for implementation, enhancing food safety and protecting consumers internationally.

Agenda Item 15: Review of Numeric Performance Criteria for Methods of Analysis for Total Aflatoxins Utilizing the Sum of Components Concept in Relevant Sampling Plans

IUFoST supports the adoption of the proposed method performance criteria to harmonize aflatoxin testing globally, noting that:

- The commodities covered are highly relevant to many countries due to their production, trade, and consumption patterns.
- The precision and recovery targets are appropriate; however, they may present challenges for laboratories with limited resources, though they remain generally achievable.
- This provision will strengthen regulatory alignment and facilitate trade by reducing non-compliance risks.
- Capacity gaps exist in some regions. Therefore, phased implementation, investment in equipment and training, and regional cooperation are essential.

- Active engagement in Codex committees (CCCF, CCMAS) is encouraged to ensure regional perspectives are included.

By adopting these criteria and addressing capacity gaps, countries can enhance food safety monitoring, promote trade, and protect consumer health.

Agenda Item 16: Application of Maximum Levels to Multi-Ingredient Products

IUFoST thanks JECFA for their rigorous scientific assessment and valuable proposals, which provide a strong foundation for harmonized, practical, and risk-based food safety standards that benefit regulators, producers, and consumers globally.

IUFoST emphasizes the need for scientifically robust and practical methodologies to apply Maximum Levels (MLs) to multi-ingredient products such as spice mixtures. Given the complexity of variable ingredient proportions, IUFoST supports the development of harmonized analytical and risk assessment approaches that account for typical ingredient composition and exposure.

The methodology should be flexible enough to balance accuracy with feasibility, especially for small-scale producers, while ensuring consumer safety.

IUFoST encourages regional data collection and methodological research to refine the ML application IUFoST also supports capacity building for laboratories and regulatory authorities to implement these methods effectively.

Agenda Item 17: Analysis of the Occurrence Data of Lead in Spice Mixtures

IUFoST thanks JECFA for their sound risk assessment using global data and high-consumer exposure estimates, highlighting significant lead exposure from spice mixtures, especially in children. While the proposed MLs (1–2 mg/kg) balance safety and practicality, regional data gaps remain a challenge.

IUFoST encourages countries to:

- Continue to develop and share regional data on spice consumption and contamination.
- Collaborate regionally to address data gaps.
- Advocate for clear Codex guidance on MLs in multi-ingredient foods.
- Balance health protection with trade realities in the region.

This will ensure effective, harmonized standards that protect consumers and support fair trade.

Agenda Item 18: Analysis of the Occurrence Data of Aflatoxins in Cereals

IUFoST would like to acknowledge JECFA's efforts and offers its thanks for JECFA's rigorous scientific assessment and risk-based approach in proposing updated maximum levels for aflatoxins in cereals. We recognize the importance of this work in addressing a critical public health concern, especially in regions where cereals are dietary staples and where aflatoxin exposure contributes significantly to disease risk.

IUFoST supports JECFA's recommendation to review and revise aflatoxin MLs in cereals to better protect consumers, while emphasizing the need for flexibility to accommodate regional differences in consumption, food security requirements, and testing capacity.

IUFoST encourages all countries to:

- Engage actively in Codex discussions informed by JECFA's findings.
- Strengthen national aflatoxin monitoring and reporting systems.
- Invest in laboratory capacity and regional cooperation to support implementation.
- Promote phased enforcement strategies that balance health protection with practical feasibility.

IUFoST would like to thank JECFA for its continued leadership in providing scientific guidance that underpins international food safety standards and supports public health worldwide.