

European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
13th Session

Yogyakarta, Indonesia, 29 April – 3 May 2019

Agenda Item 16

Discussion paper on maximum level(s) for hydrocyanic acid and mycotoxin contamination in cassava and cassava-based products

(CX/CF 19/13/14)

European Union Competence
European Union Vote

The European Union (EU) welcomes and appreciates the work done by the electronic working group chaired by Nigeria and the update performed by Nigeria as chair of the electronic working group to elaborate the discussion paper on maximum level(s) for hydrocyanic acid in cassava and cassava-based products and occurrence of mycotoxins in these products.

The EU notes that no information is provided on the issue of harmonizing the expression of HCN levels, i.e. free or total HCN while this is considered important. The EU is of the opinion that it would be appropriate that all maximum levels established for hydrocyanic acid refer to total hydrocyanic acid, i.e. hydrocyanic acid, including hydrocyanic acid bound in cyanogenic glycosides.

The EU is of the opinion that based upon the data provided in the discussion paper it is not appropriate to extend the ML of 2 mg/kg for free hydrocyanic acid in gari to all fermented products. However, given the high levels found, it might be appropriate to consider a maximum level for fermented cassava-products other than gari.

However, no information is provided if the data provided on the presence of HCN in the discussion paper relate to free or total hydrocyanic acid. The EU is of the opinion that it is most probable that the reported data refer to total hydrocyanic acid. Therefore, conclusions as regards compliance of reported levels of HCN for fermented products such as gari with the ML expressed as free HCN for gari has to be considered with caution.

Therefore, the EU is of the opinion that it is necessary to first harmonise the expression of HCN levels, i.e. free or total HCN, and to clarify if the data reported in the discussion paper refer to free or total hydrocyanic acid.

In case it is concluded to express the maximum level on total hydrocyanic acid, it has to be considered if this requires a change of the ML of HCN for gari, currently expressed as free hydrocyanic acid. Subsequently, the setting of a maximum level for HCN in other fermented cassava products can be considered.

As regards the presence of mycotoxins in cassava and cassava products, the EU is of the opinion that, from a public health point of view, it would be appropriate to continue considering the need to set a possible maximum level for aflatoxin total and ochratoxin A in cassava and cassava based products. It is therefore suggested that a discussion paper is elaborated related to the presence of aflatoxin total and ochratoxin A in cassava and cassava products for consideration at the 14th session of the CCCF.