

Agricultural and Vegetable Oils Bulletin

Edible Cereals, Grain, Pulses, Seeds, Sugar, Oils and Fats Fit for Human Consumption Statements	Bulletin 11-01 Rev. 5 - 0
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In the international commodity trade of cereals, seeds, vegetable oils, etc. it is often written into contracts and/or Letters of Credit, and therefore in principals’ instructions, that inspection companies should provide certificates that not only report specific quality parameters and results but also provide broad statements of condition. One of these is “fit for human consumption”.

Historically, inspection companies have complied with requests for ‘fit for human consumption’ statements even when there has been no generally accepted specification of what tests should be undertaken in order to support such a statement. There has therefore been considerable variation in the range of tests required.

TIC Council’s Guidelines state that any statement made by Members with regard to fitness for any particular purpose should be based on relevant analysis. Inspection companies have a duty to perform their work with due care and skill; and this includes exercising reasonable care and diligence in the choice of tests which should be undertaken before making such statements as “fit for human consumption”, so as to protect both the inspection company and its client from risks and liabilities.

TIC Council member companies are not in a position to judge what makes a product “fit for human consumption” as an inherent value, but can only assess the conformity of test results to specified criteria. In instances where it is believed that insufficient analysis and/or instructions have been made, TIC Council member companies will therefore propose to their principals additional testing or procedures so that they can make the required statement regarding the condition of the product with confidence, and referring to such tests. Where this proposal is not followed, the member company may have no option but to decline to make the necessary statement or qualify the statement in such a way as to reflect the analysis actually performed.

To offer some consistency in this approach, TIC Council members have together considered current industry practices in defining the minimum testing requirements to support the issuance of certificates stating “fit for human consumption”. This has resulted in the table attached as appendix “A” to this bulletin.

This table identifies eight categories of commodity and specifies the analyses that are considered necessary to support the statement “fit for human consumption” for each, referring to the tests performed. This is broadly based on the requirements of the CODEX Alimentarius and the World Health Organisation.

The listing is not exhaustive and additional analysis may be necessary. Individual contractual requirements and statutory regulations, provided they are made known, take precedence over the minimum analyses proposed in the table. However, where any

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customer requirement falls short of the analyses shown in the table, TIC Council members will draw this to their principals' attention, and may qualify any statement made or decline to issue certificates stating "fit for human consumption" unless appropriate analyses have been performed.

The table does not seek to establish what limits are acceptable for the analyses listed. TIC Council member companies will normally work to the limits required in the declared country of destination or, if such are not available, in the country of origin, or Codex Alimentarius.

This bulletin pertains only to Edible Cereals, Grains, Seeds, Pulses, Sugar, Oils and Fats, in their raw state, and is not applicable to any food product

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Appendix "A" to TIC Council Agricultural and Vegetable Oils Committee Bulletin 11-01 Rev 5

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MINIMUM TESTING REQUIREMENTS FOR "FIT FOR HUMAN CONSUMPTION" STATEMENTS
(From CODEX Alimentarius and WHO)

ANALYSES	COMMODITIES										
	wheat	maize	barley/ cereals	rice	pulses	sugar	oilseeds	liquids/oils	coffee	tea	cocoa
Pesticides											
Pesticide screening (incl. at least organochlorine compounds, organophosphorus compounds, pyrethroids, and carbamates)	X	X	X	X	X		X	X	X	X	X
Heavy metals											
Lead	X	X	X	X	X	X	X	X	X	X	X
Cadmium	X	X	X	X	X	X	X	X	X	X	X
Arsenicum				X			X				
Mycotoxins											
Ochratoxin	X	X	X	X	X		X		X		X
Deoxynivalenol	X	X	X				X				
Zearalenone		X									
Aflatoxin B1		X		X	X		X			X	X
Aflatoxin Total		X		X	X		X			X	X
Fumonisin B1/B2		X									
Poisonous seeds	X	X	X	X	X		X		X	X	X
Radioactivity (if origin Russia/Ukraine)	X	X	X	X	X	X	X	X	X	X	X
Ergot	X		X								
Organoleptical aspects											
Odour	X	X	X	X	X		X		X	X	X
Visual appearance	X	X	X	X	X		X		X	X	X
Sulphur dioxide						X					