

# codex alimentarius commission



FOOD AND AGRICULTURE  
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## Agenda Item 6

**CX/CF 08/2/6**  
December 2007

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON CONTAMINANTS IN FOODS  
Second Session  
The Hague, the Netherlands, 31 March - 4 April 2008**

**DRAFT MAXIMUM LEVELS FOR 3-MCPD IN LIQUID CONDIMENTS CONTAINING ACID-  
HYDROLYZED VEGETABLE PROTEINS (ACID-HVPs) (EXCLUDING NATURALLY  
FERMENTED SOY SAUCE)  
(N08-2004)**

*Comments at Step 6, in response to Circular Letter CL 2007/29-CF, submitted by Brazil, Cuba, Japan, Uruguay, EUVEPRO and IHPC*

### **BRAZIL**

According to the stated previously, Brazil agrees with the proposed draft maximum level of 0.4 mg/kg for 3-MCPD in liquid condiments containing Acid-hydrolyzed Vegetable Proteins (excluding Naturally Fermented Soy Sauce).

### **CUBA**

Cuba agrees with the maximum level of 0.4 mg/kg recommended by the CCCF in April 2007.

### **JAPAN**

#### ***Comments***

1. The Government of Japan supports the advancement of the Draft Maximum Level for 3-MCPD in Liquid Condiments Containing Acid-Hydrolyzed Vegetable Proteins (Excluding Naturally Fermented Soy Sauce) at 0.4 mg/kg in light of the data available to the Codex Committee on Contaminants in Foods (CCCF).

2. We, however, consider it necessary and useful for the CCCF and countries producing liquid condiments containing acid-hydrolyzed vegetable proteins to finalize and implement, as a matter of priority, the Code of Practice for the Reduction of 3-Monochloropropane-1,2-diol (3-MCPD) during the Production of Acid-Hydrolyzed Vegetable Protein(Acid-HVPs) and Products that Contain Acid-HVPs in view of the production conditions in many of producing countries and need for detailed data reflecting them.

#### ***Rationale***

3. We provided the CCCF at its last session with data of surveillance conducted in Japan on 3-MCPD in acid-HVPs and soy sauces containing them. Applying the ALARA principle as described in the GSCTF (the 2nd bullet on page 9, Annex 1 of the GSCTF, Codex STAN 193-1995, Rev.2-2006) to the Japanese data indicates that the draft ML of 0.4 mg/kg for 3-MCPD is appropriate in liquid condiments containing acid-HVPs(CRD 9 for the 1st CCCF).

Second bullet on page 9 of Annex I of the GSCTF states as follows:

“MLs shall be set as low as reasonably achievable. Providing it is acceptable from the toxicological point of view, MLs shall be set at a level, which is (slightly) higher than the normal range of variation in levels in foods that are produced with current adequate technological methods, in order to avoid undue disruptions of food production and trade. Where possible, MLs shall be based on GMP and/or GAP considerations in which the health concerns have been incorporated as a guiding principle to achieve contaminant levels as low as reasonably achievable.”

4. GSCTF also states, “Proposals for MLs in products shall be based on data from at least various countries and sources, encompassing the main production areas/processes of those products, as far as they are engaged in international trade.” However, data from main production countries other than Japan may not seem to be sufficient for setting an internationally applicable maximum level.

5. Since adequate technological measures to reduce acid-HVPs levels may not seem to have been taken efficiently in some of these producing countries, the acid-HVPs levels may be reduced. Accordingly, it is of concern that setting the ML at 0.4 mg/kg only based on a limited data set including data from Japan, without taking into account data from other main producing countries may cause undue disruptions of international food trade. The First Session of CCCF considered these issues and agreed that the Draft Maximum Level for 3-MCPD in Liquid Condiments Containing Acid-HVPs should be further considered in light of finalization and implementation of the Code of Practice (ALINORM 07/30/41, para. 88.).

Therefore, while we support the ML of 0.4 mg/kg, we think it preferable to set the ML after the Code of Practice is finalized and implemented in those countries which have not implemented effective measures to reduce 3-MCPD and data are collected.

#### **URUGUAY**

The subcommittee in Uruguay agrees to the ML of 0.4 mg/kg for 3-MCPD.

#### **EUVEPRO**

EUVEPRO, the European Vegetable Protein Federation, has no remarks to the proposed text, which reaches Step 6.

#### **IHPC**

IHPC fully supports the proposed maximum level (ML) of 0.4 mg/kg of 3-MCPD in liquid condiments containing acid-HVPs, excluding naturally fermented soy sauce. We believe the proposed ML is warranted by JECFA’s recent thorough evaluation of the provisional maximum tolerable daily intake (PMTDI) for 3-MCPD and the remedial action performed by acid-HVP and soy sauce manufacturers to date.