

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 13 (b)

CX/FAC 04/36/16-Add.1
March 2004
(original language only)

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-sixth Session

Rotterdam, The Netherlands, 22 -26 March 2004

**SCHEDULE 1 OF THE CODEX GENERAL STANDARD FOR CONTAMINANTS AND TOXINS IN
FOODS**

COMMENTS

The following comments have been received from: Canada, Poland and International Federation of Fruit Producers

CANADA:

With regard to the five discussion points related to Schedule I:

1. General format and structure of Schedule I.

In the event that the Committee decides to remove quality parameters from Schedule I, Canada would like to suggest that it be clearly stated that the MLs/GLs contained therein are for safety parameters only and that the Schedule contains no levels related to quality parameters. Perhaps reference to the appropriate schedule or annex could be made indicating where any levels related to quality parameters may be found.

2. Maximum levels for copper, iron and zinc.

Canada would not object to the removal of quality standards from Schedule I, which would then contain only those MLs/GLs that have been adopted by CAC for safety parameters. However, we would suggest that any quality standards be retained and clearly identified for information in Annex IV, or other appropriate annex.

3. Commodity-based presentation in Schedule IIA.

The contents of Schedule IIA present another very useful way of presenting MLs/GLs. If quality standards are not retained in these tables, then the introduction should clearly indicate the annex or standard where any existing quality standards may be found.

4. Lack of commodity codes for some existing commodities with contaminant MLs.

No comment.

5. Multiple levels for one contaminant in a food commodity.

Canada agrees with the identified need to discuss the issue of inconsistency between MLs/GLs developed by CCFAC and those developed by Commodity Committees (e.g. lead in fruit juices and in meat products). Canada believes that more recent safety-based MLs developed by CCFAC should be given precedence over older ones developed by Commodity Committees.

With regard to Annex IV:

Canada supports the maintenance of Annex IV as an important reference tool to CCFAC and Commodity Committees when they are developing standards and considering new proposed MLs.

POLAND:

In tables concerning mycotoxins (pages 60 – 67) maximum level given in mg/kg should be replaced by µg/kg.

INTERNATIONAL FEDERATION OF FRUIT PRODUCERS (IFU):

Generally speaking we can still accept the limits of the various contaminants in fruit juices and nectars. However, most of these limits are originating from the existing standards for various fruit juices and nectars. As these standards will be revoked once the new general standard for fruit juices and nectars is finally adopted, some minor corrections will be necessary.

Lead

The levels of 0,3 mg/kg for fruit juices and fruit nectars are the values of the existing standards and have been replaced by the new level of 0,05 mg / kg. The old levels can be deleted.

Tin

The different levels for various fruit juices and nectars should be deleted and replaced by an uniform level. We propose 200 mg/kg for all fruit juices and nectars in cans.

Cu, Fe, and Zn

The levels of these three contaminants for fruit juices and nectars are also originating from the existing standards and are still acceptable for the fruit juice industry. However, the opinion on these elements is no more the same as it was when the old standards were established. To a certain extent these minerals are considered today also as nutrient. Who is deciding, whether we are still speaking about contaminants or about nutrients? Is it a question of quantity?