

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 15 (g)

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

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POSITION PAPER ON DIOXINS AND DIOXIN LIKE PCBs - COMMENTS

The following comments have been received from: Germany and Japan.

GERMANY:

Germany thanks the Netherlands for reviewing the document.

Under the heading "Eggs of free range chickens" (paragraphs 35 and 36) Germany asks for the following text to be added:

In anticipation of the maximum level for dioxins (PCDD/PCDF) in hen eggs from extensive forms of keeping (free range and semi-intensive eggs¹) of 3 pg WHO-PCDD/F-TEQ/g fat valid EC wide as of 01 January 2004, the German Federal Office of Consumer Protection and Food Safety collected existing data between April and July 2003 on the dioxin content in extensive hen eggs from the Länder (federal states) who are responsible for the official control of food safety. It was found that the maximum level of 3 pg WHO-PCDD/F-TEQ/g fat for dioxins in hen eggs from extensive forms of keeping valid as of 01 January 2004 or the action level of 2 pg WHO-PCDD/F-TEQ/g fat pursuant to the Commission Recommendation of 4 March 2002² had been exceeded in some cases. These were, however, only few cases giving no reason for concern, the exceedance of the values giving no reason for concern, either. A thorough estimate of the proportion of hen eggs from extensive forms of keeping in Germany which could potentially exceed the maximum level as of 1 January 2004 in their dioxin content cannot be given due to the fact that the present data is not representative.

JAPAN:

1. We thank Netherlands for its effort in compiling and summarizing dioxins and dioxin-like PCBs data in foods and feeds submitted by many countries in the Position Paper. We apologize for the late submission but would like to provide data of surveillance conducted in Japan on dioxins and dioxin-like PCBs in foods.

¹ Free range and semi-intensive eggs as defined in Article 18 of Regulation (EEC) No. 1274/91 of the Commission (Official Journal L 121 of 16/5/1991, p.1), as amended by Regulation (EC) No. 1651/2001 of the Commission (Official Journal L 220 of 15/8/2001, p5).

² Recommendation 2002/201/EC of the Commission of 4 March 2002 on the reduction of the presence of dioxins, furans and PCBs in feedingstuffs and foodstuffs (Official Journal L67 of 9/3/2003, p. 67-73).

2. The attached table contains results of the surveillance as follows:

- Analysis of commodities sampled at the market in 1998-2000 (including imported commodities sampled at the time of quarantine inspection);

- Analysis of domestically produced commodities sampled before being set to the market (e.g. at the time of harvest; and at slaughter house, fishing port, wholesale market and manufacturers) in 1999-2002.

Values in the table were calculated on lower-bound levels, using the WHO-TEF (1997)

Comments on the Position Paper

3. The basis of calculation and expression of dioxins and dioxin-like PCBs in each food group should be clarified in the Position Paper, i.e., lower-bound, medium-bound or upper-bound and products base or fat base.

4. Data are compiled for a group of vegetables, fruits and cereals in the OCCURRENCE IN FOOD but not for individual groups of vegetables, fruits or cereals. Although we agree that dioxins and dioxin-like PCBs in fish and meat are more important in dietary exposure than those in cereals, pulses, vegetables and fruits, the data of Japan indicate that the background levels of dioxins and dioxin-like PCBs in leafy vegetables tend to be higher than those of cereals, pulses, other vegetables and fruits. Taking into consideration different consumption levels of vegetables and cereals, pulses and fruits, we believe that when estimating background levels of dioxins and dioxin-like PCBs for food commodities, it is necessary to examine data for dioxins and dioxin-like PCBs compiled separately for food groups as contained in the attached table.

5. The 3rd bullet in the 9th paragraph on Asia in DIETARY INTAKE should be replaced by the following:

- Data from 2001 show an average daily intake of 129.7 pg TEQ/day (2.59 pg TEQ/kg bw/day) for dioxins and dioxin-like PCBs, with an average of 64.8 pg TEQ/day for dioxins and an average of 64.9 pg TEQ/day for dioxin-like PCBs, based on “medium-bound” levels. The “lower-bound” estimate was 81.5 pg TEQ/day (1.63 pg TEQ/kg bw/day) as the sum of 27.0 pg TEQ/day of dioxins and 54.5 pg TEQ/day dioxin-like PCBs. The most relevant food group was fish and shellfish, with a contribution of 52% and 75% on “medium-bound” and “lower-bound” levels, respectively. The differences in estimates calculated from “lower-bound” and “medium-bound” levels were mainly due to the great proportions of non-quantified congener in the analysis of several food groups (rice, cereals and potatoes etc).

Table: Occurrence of dioxins and dioxin like PCBs in various groups of foodstuffs in Japan

	PCDD and PCDF pg TEQ/g product	Dioxin like PCBs pg WHO-TEQ/g product	Dioxins and dioxin-like PCBs pg TEQ/g product	
Eggs	0.005 - 0.144	0.003 - 0.229	0.035 - 0.361	(1)
	0.005 - 0.144	0.003 - 0.229	0.009 - 0.361	(2)
Beef	0.0001 - 1.627	0.0001 - 0.357	0.0003 - 1.999	(1)
	0.005 - 1.575	0.0007 - 0.357	0.006 - 1.999	(2)
Poultry	0.0001 - 0.262	0.0001 - 0.240	0.0001 - 0.379	(1)
	0.00001 - 0.156	0.0005 - 0.240	0.0007 - 0.352	(2)
Pork	0.0001 - 0.221	0.0001 - 1.218	0.0001 - 1.85	(1)
	0.00002 - 0.178	0.0002 - 0.028	0.0004 - 0.185	(2)
Fish	<0.0002 - 10.9	0.00001 - 22.436	0.00002 - 25.720	(1)
	<0.0002 - 10.9	0.00001 - 9.22	0.00002 - 16.2	(2)
Milk and dairy product	0.0002 - 0.401	0.0003 - 0.639	0.0004 - 1.037	(1)
	0.0002 - 0.401	0.0003 - 0.112	0.0004 - 0.589	(2)
Cereals	<0.001 - 0.08	<0.001 - 0.011	<0.001 - 0.08	(1)
Cereals*	<0.001 - 0.08	<0.001 - 0.004	<0.001 - 0.08	(2)
Pulses**	<0.001 - 0.06	<0.001 - 0.001	<0.001 - 0.06	(2)
Vegetables, Fruits	<0.001 - 0.51	<0.001 - 0.130	<0.001 - 0.55	(1)

Leafy Vegetables ***	<0.001 - 0.51	<0.001 - 0.074	<0.001 - 0.55	(2)
Other Vegetables ****	<0.001 - 0.06	<0.001 - 0.029	<0.001 - 0.08	(2)
Fruits *****	<0.001 - 0.07	<0.001 - 0.014	<0.001 - 0.08	(2)

(1) : Aggregate of all surveillance data

(2) : Analysis of sampling domestically produced commodities at places sampled before being sent to the market retailing (e.g. place of at the time of harvesting crops,; and at slaughter house, fishing port, wholesale market, and manufacturers) in 1999-2002.

* : Rice (husked) and Wheat (grain)

** : Soya bean (dry) and Adzuki bean (dry)

*** : Komatsuna, Lettuce (head), Spinach, Garland Chrysanthemum, Jew's marrow, Chinese cabbage

**** : Onion (bulb), Onion (Welsh), Broccoli, Cabbage (head), Winter squash, Watermelon, Egg plant, Okra, Peppers (sweet), Sweet corn, Tomato, Common bean, Garden pea, Soya bean (immature seeds), Taro, Sweet potato, Carrot, Potato, Radish, Yams, Lotus root, Ginger (root), Strawberry

***** : Ponkan orange, Mandarin orange, Apple, Nashi pear, Apricot (Japanese), Peach, Japanese persimmon