

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 17 (f)

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ORIGINAL LANGUAGE ONLY

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

Thirty-seventh Session

The Hague, the Netherlands, 25 – 29 April 2005

DISCUSSION PAPER ON CHLOROPROPANOLS

COMMENTS

The following comments have been received from: Australia, Cuba and USA

Australia:

At the 36th Session of CCFAC it was agreed that a working group under the direction of the UK with assistance from Australia and other countries and the IHPC would prepare an updated discussion paper on chloropropanols with proposals for maximum levels for 3-MCPD in acid-HVPs and food containing HVP for circulation, comment and consideration at the 37th Session of CCFAC.

Australia welcomes the paper and considers it a useful and well-balanced document, which will facilitate discussion at this years CCFAC meeting. As a member of the working group, Australia supports the work done so far and facilitated the working group by submitting a Technical paper on chloropropanols (detailing Australian exposure to chloropropanols) to the UK for consideration in updating the current discussion paper.

Australia would like to submit the following comments:

Australia established maximum limits (MLs) of 0.2 mg/kg for 3-MCPD and 0.005 mg/kg (Limit of Detection) for 1,3-DCP in order to protect public health and safety of Australian consumers based on the Joint Expert Committee on Food Additives (JECFA) (2001) risk assessment of chloropropanols, and at a level that was considered achievable for manufacturers of soy and oysters sauces in order to keep levels to as low as reasonable achievable (ALARA) and to encourage industry to continue their efforts of minimisation of chloropropanols in the food supply.

Australia supports the establishment of MLs for HVP on the principle that setting limits in raw materials is an appropriate means for establishing limits for downstream foods produced from the raw material. Australia also supports establishment of MLs for soy and oyster sauces, as Australian survey data has found that the level of acid-HVPs is highly variable, these commodities move significantly in international trade, and there are still concerns that labelling of these products cannot be relied upon in terms of excluding 'naturally fermented' products.

However, Australia does **not** agree that an exposure assessment should be performed at only a level of 0.02 mg/kg for 3-MCPD, as this would appear to be too low, considering that an exposure assessment performed for Australian consumers demonstrated that a level of 0.2 mg/kg was adequate in protecting public health without major disruptions in trade of food products containing chloropropanols. Australia suggests that CCFAC request JECFA to conduct an exposure assessment on a range of MLs above and below the MLs that currently exist in member countries (0.02 to 1.0 mg/kg) for 3-MCPD in acid-HVP and products made by vegetable protein hydrolysis and other significant contributors to dietary intake of chloropropanols.

Australia agrees that a Code of Practice for the production of soy sauce and processed vegetable proteins using acid hydrolysis would be useful.

Cuba:

In our opinion the document provides very valuable information and we have no new comments concerning it.

USA:

The United States supports the recommendation (para. 36) to request the Joint FAO/WHO Expert Committee on Food Additives (JECFA) to conduct an exposure assessment for 3-MCPD based on a range of maximum levels below and above the existing national maximum levels reported in the discussion paper. We note, however, that before requesting JECFA to conduct such an exposure assessment, CCFAC needs to agree on the food products that JECFA should consider. Based on JECFA's previous recommendations, the United States of America recommends that CCFAC request JECFA to conduct an exposure assessment on liquid condiments (e.g., soy sauces and similar products) containing acid hydrolyzed protein added directly or produced during manufacturing.

The United States supports, as new work, the elaboration of a code of practice for reducing chloropropanol levels in the production of liquid condiments containing acid hydrolyzed protein added directly or produced during manufacturing.