

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 18

CX/CF 24/17/18

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

17th Session

15-19 April 2024

Panama City, Panama

REVIEW OF CODEX STANDARDS FOR CONTAMINANTS

Comments in reply to CL 2023/83-CF

submitted by

Canada, Chile, Egypt, Iraq, New Zealand, Peru, Saudi Arabia, United States of America (USA)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/83-CF¹ issued in November 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections. This document only compiles general comments.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby annexed and presented in tabulated format.

¹ <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCCF>

ANNEX I**GENERAL AND SPECIFIC COMMENTS**

Question 1: Indicate support of the updates and revisions made by Canada, as WG Chair, as described in points 3-7, or otherwise provide a rationale for any alternate suggestions.

Question 2: Recommend standards already in the OHPL (Annex II) that could be considered overall highest priority for review based on the prioritization criteria (Annex III) or other clear, reasonable rationale.

Question 3: Recommend additional standards from Lists A and B (Annex I) for inclusion in the OHPL (Annex II) based on the prioritization criteria (Annex III) or other clear, reasonable rationale.

Question 4: Indicate whether your country is willing to lead or co-lead any items presently listed, or newly recommended for inclusion in (i.e. in response to this circular letter), the OHPL (Annex II).

Question 5: Provide editorial or any other feedback on:

(i) Lists A and B (Annex I)

(ii) the OHPL (Annex II)

(iii) the prioritization criteria (Annex III), including proposals for any new criteria

(iv) the process by which the trial period is proceeding, as these are all open to adjustments during the 3- year trial period (2022-2024) 13.

Question 6: Other considerations not covered by the above points.

COMMENT	MEMBER/OBSERVER
<p>Q1 - Canada supports the annual updates and revisions made by Canada to List A, List B and the OHPL.</p> <p>Q3 - Canada does not recommend additional standards from Lists A and B (Annex I) for inclusion in the OHPL (Annex II) based on the prioritization criteria (Annex III) or other rationale.</p> <p>Q4 - Canada is already leading the work to determine the need to update the Code of Practice for Raw materials and supplemental feedingstuffs for milk-producing animals (CXC 45-1997) and does not volunteer to lead any other new work at this time.</p> <p>Q5 - Canada does not have any editorial or any other feedback on: (i) Lists A and B (Annex I) (ii) the OHPL (Annex II) (iii) the prioritization criteria (Annex III) and agrees with the changes proposed by the WG Chair.</p> <p>Q6- Canada has no additional comments that are not covered by the above points.</p>	<p>Canada</p>
<p>Luego de revisar los criterios de priorización, así como los anexos I y II incluidos en esta carta circular, no tiene objeciones y apoya y agradece las actualizaciones realizadas por Canadá. Revisado el Anexo II en cuanto a las normas que ya figuran en la Lista general de máxima prioridad, Chile considera que la priorización reflejada en este anexo es la correcta y no tiene comentarios. Chile quisiera resaltar que asume que aquellas normas que cuentan en el anexo con un país miembro voluntario para su revisión serían las primeras en la lista de actualización en ser revisadas y apoya esta alternativa como una forma de priorización.</p>	<p>Chile</p>

COMMENT	MEMBER/OBSERVER
<p>Q3: Egypt suggests to re-evaluate cadmium in food due to the following Information: Cadmium Overview: Cadmium (Cd) is a heavy metal present in the environment due to natural factors and industrial/agricultural activities, with food as the primary source. Key food groups contributing to dietary cadmium exposure include cereals and cereal products, vegetables, nuts, pulses, starchy roots or potatoes, meat, meat products, bivalve molluscs, and wild mushrooms. Health Impacts: Cadmium is toxic to the kidneys, potentially leading to renal failure, and can cause bone demineralization. It is classified as a Group 1 human carcinogen based on occupational studies. Recent data indicate an elevated risk of cancer, particularly in the lung, endometrium, bladder, and breast. Regulatory Considerations: To potentially reduce dietary exposure to cadmium, there is a need for the re-evaluation of maximum levels for cadmium in food. The European Food Safety Authority (EFSA) plays a crucial role in this context, establishing a Tolerable Weekly Intake (TWI) for cadmium, currently set at 2.5 µg/kg bw per week.</p>	<p>Egypt</p>
<p>Agree</p>	<p>Iraq</p>
<p>New Zealand would like to indicate its agreement of the updates and revisions made by Canada, as WG Chair, as described in points 3-7 of CL2023/83-CF. New Zealand does not wish to add standards from Lists A and B (Annex I) for inclusion in the OHPL (Annex II), nor wish to recommend the highest priority for review. New Zealand doesn't have any comments on the Annexes of CL2023/83-CF or the prioritization process.</p>	<p>New Zealand</p>
<p>De acuerdo al documento remitido, expresamos nuestro apoyo a las actualizaciones y revisiones realizadas por Canadá, en su calidad de Presidente del GT, tal como se explican en los puntos 3 a 7</p>	<p>Peru</p>
<p>Q1: We fully support the updates and revisions made by Canada as the WG Chair, as described in points 3-7.</p> <p>Q2: Upon careful consideration, we have reviewed the standards outlined in Annex II of the OHPL. However, based on the prioritization criteria and after considering other clear, reasonable rationales, we do not have any specific recommendations for review at this time</p> <p>Q3: After careful consideration, we have identified the following standards that we believe warrant high priority for review:</p> <ul style="list-style-type: none"> - 3-MCPD in infants formula and foods, prioritization criteria: <ul style="list-style-type: none"> o List A.1 (priority 1) <ul style="list-style-type: none"> Staple food (priority 1) New occurrence data available (priority 1) New HBGV available (priority 1) Relevant to developing countries (priority 1) <p>Q4: Yes, Saudi Arabia is willing to lead or co-lead any items presently listed or newly recommended for inclusion in the OHPL</p>	<p>Saudi Arabia</p>

COMMENT	MEMBER/OBSERVER
<p>The United States appreciates the opportunity to comment on CL 2023/83.</p> <p>Paragraph 8 (Q1)</p> <ul style="list-style-type: none"> The United States supports the revisions made by Canada as described in paragraphs 3-7. <p>Paragraphs 9-11 (Q2/3/4)</p> <ul style="list-style-type: none"> The OHPL includes a comment regarding cadmium MLs: “Consider first drafting a CoP for the mitigation of cadmium in crops, followed by a data collection on products and possible review of the MLs after the application the CoP. (EU, CX/CF 22/15/17) (Japan, CX/CF 23/16/14),” but does not mention a member country volunteer. We note that the United States will be presenting a Discussion Paper proposing a draft Code of Practice for the Prevention and Reduction of Cadmium in Foods at CCCF17. Regarding revision of CXC 49-2001 (source directed measures) in the OHPL, the United States supports this work, but cannot volunteer to chair the work for 2025. Regarding patulin in the OHPL, the United States would be willing to chair a discussion paper for CCCF18 or CCCF19 on patulin in products other than apple juice, depending on new data being provided to GEMS/Food. <p>Paragraph 12 (Q5)</p> <ul style="list-style-type: none"> For clarity, consider amending the title of List A as follows (changes underlined): List A: Codex Contaminant Standards Established or Reviewed Either <u>≥25 Years Ago</u> or <u>≥15 and <25 Years Ago</u>. <p>Paragraph 14</p> <ul style="list-style-type: none"> For future CLs on this agenda item, it may be helpful to include a table/list of compounds evaluated by JECFA for which CCCF has not started risk management work. Alternatively, the CL could include a table of compounds evaluated by JECFA and status of RM activities. 	<p>USA</p>