

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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Agenda Item 16 B

CX/FAC 03/27  
February 2003

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

Thirty-fifth Session

Arusha, United Republic of Tanzania, 17 - 21 March 2003

#### COMMENTS SUBMITTED ON THE MAXIMUM LEVELS FOR LEAD IN MILK AND MILK FAT IN RESPONSE TO CL 2002/10-FAC

The following comments have been received from Denmark, New Zealand:

#### **DENMARK:**

In Codex, ML's on milk (0,02 mg/kg) and milk fat (0,1 mg/kg) have been adopted but with a footnote saying that "for dairy products, an appropriate concentration factor should apply".

The problem raised at the CCFAC meeting in 2002 was that the concentration factor between milk and milk fat is approximately 20 whereas the factor between the two ML's is only 5.

In Denmark we usually find contents of lead in milk below 0,005 mg/kg. However, the ML was set at 0,02 mg/kg due to discussions on detection limits on available methods of analysis. Therefore, there is the proper factor between the limit for milk fat and the content of lead in milk, but the limit for lead in milk was set quite high compared to the lead content in milk but due to analytical problems.

Therefore, Denmark is of the opinion that one of the following two solutions would be best:

1. To **keep the ML's for milk and milk fat** as they are but delete the footnote on concentration factor. To **keep the ML for milk** and delete the ML for milk fat and the footnote with the argument that milk fat does not contribute significantly to the intake of lead.

#### **NEW ZEALAND:**

We would support the view that no separate specification for milk fat needs to be elaborated as long as we state to the effect that the threshold for lead in processed products takes into account the concentration factors from the raw milk incurred during the processing to the final product in which the lead is measured. The wording of the footnote conveys this requirement.