

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 20

CRD13

ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

13th Session

Yogyakarta, Indonesia, 29 April – 3 May 2019

DISCUSSION PAPER ON A FORWARD WORKPLAN FOR THE CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Comments submitted by European Union

European Union

The European Union and its Member States (EUMS) welcome and appreciate the discussion paper on a forward workplan prepared by the Host Country, JECFA and the Codex secretariats.

As regards Appendix A – Identification of key staple food – contaminant combinations

The EUMS note **some inconsistencies and inaccuracies** in the information provided

- Millet and sorghum are identified as important staples but finally not mentioned under the most important staples.
- Barley and rye are not identified as staple foods but are mentioned in the table providing an inventory on existing MLs and COPs for staple foods.
- In the table, the acronym FFP is used and it is not clear what it stands for. In case it stands for “For Further Processing” it should be deleted as the heading for the cereals refers to “raw grains”.
- The maximum level of cadmium for rice is for polished rice and for inorganic arsenic in polished rice and husked rice (not for raw grains). The maximum level for arsenic in rice is for inorganic arsenic.

As regards the **recommendation** referred to in Appendix A, the EUMS consider the approach an adequate framework to identify important topics of work for CCCF from a public health perspective, to be taken up in the forward plan for future work.

Although not being identified as a major staple food, the EUMS are of the opinion that oilseeds and derived products (vegetable oils) could be considered in this approach.

As regards Appendix B: Review of existing CCCF standards that may need revision

The EUMS are in favor of developing a structured approach to identify the need to review existing standards.

A possible structured approach could be to issue a **Circular Letter** (frequency to be determined: yearly, two-yearly) requesting Codex members to indicate which standards (maximum levels, sampling plans or Codes of Practice) should be considered by CCCF for review and this based on one of the following criteria (non-exhaustive list)

- Availability of a new risk assessment providing evidence that a certain contaminant is of higher risk for public health in comparison with previous risk assessments and therefore it is appropriate to review the existing maximum levels to provide a high level of human health protection.
- Availability of new occurrence data, eventually following the implementation of a Code of Practice, providing evidence that it is appropriate to review an existing maximum level.
- Availability of new significant information on prevention, reduction and mitigation of a contaminant, necessitating the update/review of an existing Code of Practice.

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In addition, a list of standards (maximum levels, sampling plans, Codes of Practice) which have not been subject of a review in the past 10 years, should be provided in Annex to the Circular Letter. Codex members are invited to provide, if appropriate, comments and/or information on the listed standards in view of consideration by CCCF on the need to review the concerned standard in the light of the information provided.

The abovementioned suggested approach follows largely the approach currently followed by CCCF to update and propose new substances for inclusions in the Priority list of contaminants and naturally toxicants for evaluation by JECFA.

As regards Appendix C: Evaluation of implementation of CCCF COPs – proposed STDF project

The EUMS agree on the major importance of the effective implementation of the CCCF COPs for preventing and reducing the presence of contaminants in the feed and food supply. Therefore, the EUMS agree with a structured approach as the evaluation of implementation of CCCF COPs.

The EUMS refer to the discussions that have taken place at the 31st Session of the Codex Committee on General Principles (CCGP), in particular on an Observation structure for the application of Codex standards. (REP19/GP, §§ 73 – 81). The discussion was initiated as it was noted that Codex standards could be used in many ways and that more information on how they were used could contribute to the development of more effective and useful standards. It was concluded at CCGP31 that, taking into account the discussions that had taken place at the meeting, a discussion paper on the monitoring of the use of Codex standards should be prepared for consideration/discussion at CCGP32.

The EUMS are of the opinion that the evaluation of the implementation of CCCF COPs should be integrated into this overall reflection/discussion on the application/implementation of the Codex standards, currently undertaken in CCGP.

Therefore, the EUMS propose to await further development of this project as described in the Appendix C of CX/CF 19/13/18 until the discussion on an overall approach on the application/implementation of the Codex standards is more advanced. This is important to ensure that any action agreed by CCCF as regards the evaluation of implementation of CCCF COPs fits within/is in line with the overall Codex approach on the application/implementation of the Codex standards. As the reflections outlined in the Appendix C could be useful for the overall discussion, the EUMS suggest that CCCF informs CCGP thereof.

As regards Appendix D: Possible other future topics for CCCF

The EUMS are of the opinion that several topics could be the subject of new work such as identification of key feed commodity – contaminant combinations (short term), plant toxins (short term), marine biotoxins (short term) and new developments in food production (longer term).

While the EUMS acknowledge that the area of packaging or more in general Food Contact Materials are important from a public health point of view, the EUMS are of the opinion that this is such a vast area that it is not possible to include this in the work of CCCF in a comprehensive way. Alternatively, the EUMS could agree to consider within CCCF specific topics/substances whereby their presence in food is related to, but not necessarily solely from food contact materials (e.g. mineral oils, phthalates, ...) (short term)