

codex alimentarius commission

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FOOD AND AGRICULTURE
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JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 10

CX/CF 07/1/13 Add.1
April 2007

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

First Session
Beijing, China, 16 - 20 April 2007

DISCUSSION PAPER ON CHLOROPROPANOLS DERIVED FROM THE MANUFACTURE OF ACID-HVP AND THE HEAT PROCESSING OF FOODS

Comments to the Discussion Paper submitted by the European Community and Norway

This document contains late submissions of comments received after the deadline, but those were submitted before 1 April 2007.

EUROPEAN COMMUNITY

At the 38th session of the Codex Committee on Food Additives and Contaminants (CCFAC) the Committee agreed to maintain the proposed draft Maximum Level of 0,4 mg/kg¹ at Step 4.

The European Community (EC) refers to its comments as mentioned in CX/FAC 06/38/32 and CX/FAC 06/38/32 Add. 1.

The EC notes that a draft Code of Practice for the Reduction of 3-MCPD in acid hydrolysed vegetable protein (HVP) and products that contain acid-HVPs is currently under discussion at CCCF.

The EC has operated a maximum level of 0.02 mg/kg¹ for 3-MCPD in HVP and soy sauce since April 2002. This level was set using the principle of ALARA (as low as reasonably achievable) when 3-MCPD was originally considered to be a genotoxic carcinogen. Subsequent risk assessments have concluded that 3-MCPD is carcinogenic, but not genotoxic. The maximum level was reviewed. However, enforcement activities showed that 3-MCPD levels above this value tend to be very much higher and appear to be a result of bad practice.

At the 67th meeting of the Joint FAO/WHO Expert Committee on Food Additives (JECFA 2006) the Committee retained the previously established PMTDI of 2 µg/kg bw for 3-chloro-1,2-propanediol as no new pivotal toxicological studies had become available. The Committee noted that reduction in the concentration of 3-MCPD in soy sauce and related products made with acid-HVP could substantially reduce the intake of this contaminants by certain consumers of this condiment.

Taking into account the comments made by other member countries, the discussion paper on chloropropanols (CX/CF 07/1/13) and the new data provided by Japan on acid-HVPs from well-controlled production processes (CX/FAC 06/38/32 Add.1), the EC is in a position to **accept a level of 0.1 mg/kg¹** for 3-MCPD in liquid condiments containing HVPs.

¹ Referring to the liquid product containing 40% of dry matter

This maximum level will significantly reduce the intake from soy sauce and acid-HVP containing foods and dietary exposure of 3-MCPD for adults and children is well below the PMTDI of 2 µg/kg.

It is recognised that whilst it is technically possible to reduce 3-MCPD levels to below **0.1 mg/kg**, the organoleptic properties of such products can be adversely affected and that implementing manufacturing procedures to reduce the levels of 3-MCPD can be technically difficult and expensive.

However, for any level **higher than 0.1 mg/kg** for 3-MCPD in liquid condiments containing HVPs which is put forward for consideration at CCCF, the EC is of the opinion that it is necessary to demonstrate that such a higher level is the lowest reasonably achievable by applying good practices, without unduly compromising organoleptic properties and with reasonable costs.

For reasons outlined in the document CX/FAC 06/38/32, the exception clause “excluding naturally fermented soy sauce” should be deleted.

NORWAY

Norway would like to submit the following comments regarding ALINORM 06/29/12 para 177 and Appendix XXVII, Agenda Item 10.

Norway is in favour of a maximum level of 0.1 mg/kg for 3-MCPD in liquid condiments containing HVPs. Information given in the discussion paper (CX/CF 07/1/13) and comments from other member countries as well as industry indicate that such a level is technically feasible.

Applying a maximum level of 0.1 mg/kg would significantly reduce the exposure of 3-MCPD from soy sauce and related products containing acid-HVP and intake for both adults and children would be well below the PMTDI of 2 µg/kg bw.