

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 3.1

CX/FO 24/28/3 Add.1

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FATS AND OILS

Twenty-eight Session

Kuala Lumpur, Malaysia

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### COMMENTS ON THE RECOMMENDATIONS OF JECFA90 AND JECFA91 ASSESSMENT OF SUBSTANCES PROPOSED AS PREVIOUS CARGOES

#### Comments in reply to CL 2022/81/OCS-FO

*Comments of Brazil, Ecuador, European Union, Iran, Iraq, Kenya, Norway, Peru and Sierra Leone*

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to [CL 2022/81/OCS-FO](#) issued in December 2022. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

#### Explanatory note on the appendix

2. The comments submitted through the OCS are hereby attached as **APPENDIX I** and are presented in table format.

## APPENDIX I

## COMMENTS ON THE RECOMMENDATIONS OF JECFA90 AND JECFA91 ASSESSMENT OF SUBSTANCES PROPOSED AS PREVIOUS CARGOES

<b>GENERAL COMMENTS</b>	
<p>Kenya appreciates the work done by the JECFA expert committee and supports the recommendations of the JECFA90 and JECFA91 reports on the assessment of substances proposed as previous cargoes.</p> <p>However, Kenya seeks clarification from JECFA on their assessment of mineral oil products due to issues of cross-contamination, and the fact that the evaluation assumed that mineral oil products shipped as previous cargoes are highly refined food-grade products free of Mineral Oil Aromatic Hydrocarbons (MOAH.)</p> <p>Rationale: There is a possibility of cross-contamination of mineral oil products during transportation.</p> <p>Additionally, the report states that the evaluation of mineral oils assumed that mineral oil products shipped as previous cargoes are highly refined food-grade products free of Mineral Oil Aromatic Hydrocarbons (MOAH).</p>	<b>Kenya</b>
Brazil thanks the Codex Secretariat for advising CCFO Members about the availability of the reports of 90th and 91st of the Joint FAO/WHO Expert Committee on Food Additives meetings. Brazil would like to express its position below.	<b>Brazil</b>
<p>The EU further supports proposals of the 90th and 91st JECFA for new listings for acceptable previous cargoes with the following comments:</p> <ul style="list-style-type: none"> <li>• The EU can accept to add tridecyl alcohol, myristyl alcohol and unfractionated fatty alcohols to the list of acceptable previous cargoes provided that it is specified that their sources are edible types of fats and oils</li> <li>• The EU can accept to add mineral oil, medium and low viscosity, classes II and III to the list of acceptable previous cargoes provided that it is specified that no quantified concentrations of aromatic mineral oil hydrocarbons should be present.</li> </ul>	<b>European Union</b>
Ecuador is grateful for the work carried out and, with regard to the request made in document "RECOMMENDATIONS OF JECFA90 AND JECFA91 ASSESSMENT OF SUBSTANCES PROPOSED AS PREVIOUS CARGOES", the country would like to communicate that it does not have available any chemical or toxicological information on the proposed substances, i.e. montan wax, calcium lignosulfonate liquid, acetic anhydride and cyclohexane, for evaluation as previous cargoes. However, we encourage the continuation of this work and look forward to any future requests, for which we may have more information.	<b>Ecuador</b>
Sierra Leone is in agreement with the document and supports its ratification.	<b>Sierra Leone</b>
Agree, with no comments	<b>Iraq</b>
Since this issue is based on knowledge, we agree to carry out it	<b>Iran</b>
<b>SPECIFIC COMMENTS ON THE RECOMMENDATIONS OF THE NINETIETH REPORT (JECFA90)</b>	
<i>Recommendation 1 - CCFO revise criterion no. 2 in CXC 36-1987 as adopted by CAC34 (2011)</i>	
<p>1) The Committee recommended that the Codex Committee on Fats and Oils (CCFO) consider revising Criterion no. 2 in CXC 36-1987 as adopted by CAC34 (2011).</p> <p>Answer: Peru agrees with revising Criterion no. 2 in standard CXC 36-1987, last amended in 2022.</p>	<b>Peru</b>
1) Brazil agrees with the proposal of an updated, more conservative generic human exposure value of 0.3 mg/kg bw per day for the revision of criterion no. 2 of CXC 36-1987, as proposed by JECFA on the 90th meeting report;	<b>Brazil</b>
The European Union (EU) supports amending criterion 2 in CXC 36-1987 as recommended by the 90th and 91st JECFA.	<b>European Union</b>
<i>Recommendation 2 - To conduct an evaluation of montan wax for acceptability as a previous cargo</i>	

<p>2) To conduct an evaluation of montan wax for acceptability as a previous cargo, data from toxicological testing of appropriate test substances that are sufficiently representative of the forms of montan wax that are shipped as a previous cargo are needed, taking into account variability due to source, region and degree of refinement.</p> <p>Answer: At present, Peru does not have available any studies on the degree of refinement or chemical constituents of montan wax, or any repeat dose toxicological data on representative products in a relevant animal model for said wax.</p>	<b>Peru</b>
<p>2) Brazil does not have information to provide about the substances montan wax, calcium lignosulfonate liquid and acetic anhydride and cyclohexane.</p>	<b>Brazil</b>
<p><i>Recommendation 3 bullet 1 – Make available sufficient chemical and toxicological information that allows the evaluation of calcium lignosulfonate</i></p>	
<p>3) The Committee recommended that sufficient chemical and toxicological information that allows the evaluation of calcium lignosulfonate liquid as shipped are made available prior to the next evaluation. At a minimum this information should address the following:</p> <p>Answer: At present, Peru does not have available any studies about the chemical component identification of calcium lignosulfonate liquid, or any toxicological data on said substance.</p>	<b>Peru</b>
<p><b>bullet 1</b> - Molecular weight range(s), chemical component identification and relative composition;</p> <p>It is hereby confirmed that the sponsor is ready to submit data for further evaluation.</p> <p>They have data that summarize the chemical identity of the calcium lignosulfonate as shipped together with a description of the manufacturing process, and the physical and chemical composition, including impurities and molecular weight determination.</p>	<b>Norway</b>
<p><b>bullet 2</b> - Toxicological data on representative products.</p> <p>It is hereby confirmed that the sponsor is ready to submit data for further evaluation.</p> <p>They have data on representative products for the endpoints acute toxicity, effects on eyes and skin, allergenicity and genotoxicity. Regarding genotoxicity, new test data are available for the product as shipped and for a new representative isolated low molecular weight fraction (1kDa cut off membrane).</p>	<b>Norway</b>
<p><b>SPECIFIC COMMENTS ON THE RECOMMENDATIONS OF THE NINETY-FIRST REPORT (JECFA91)</b></p>	
<p><i>Recommendation 1 - Consider revising Criterion no. 2 in CXC 36-1987</i></p>	
<p>1) The Committee reiterated the recommendations made at the ninetieth meeting that the Codex Committee on Fats and Oils (CCFO) consider revising Criterion no. 2 in CXC 36-1987 as adopted by CAC34 (2011).</p> <p>Answer: Peru agrees with revising Criterion no. 2 in standard CXC 36-1987, last amended in 2022.</p>	<b>Peru</b>
<p><i>Recommendation 2 - Make available sufficient chemical information that allows the evaluation of acetic anhydride and cyclohexane</i></p>	
<p>2) The Committee recommended that sufficient chemical information that allows the evaluation of acetic anhydride and cyclohexane transported as previous cargoes be made available prior to the next evaluation. At a minimum this information should address the following:</p> <p>Answer: At present, Peru does not have available any studies on product grade(s) and composition of acetic anhydride or cyclohexane, or about levels of impurities arising from the manufacture of said substances.</p>	<b>Peru</b>