

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
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World Health
Organization

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Agenda Item 5

CF12/CRD07

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

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PROPOSED DRAFT AND DRAFT MAXIMUM LEVELS OF LEAD IN SELECTED COMMODITIES IN THE *GENERAL STANDARD FOR CONTAMINANTS AND TOXINS IN FOOD AND FEED (CODEX STAN 193-1995) (AT STEPS 7 AND 4)*

Comment submitted by China, EU, Uganda and AU

CHINA

China would like to thank the US delegations for the proposed draft and draft MLs of lead in selected commodities, and we appreciate the opportunity to provide the following comments in respond to the circular letter CL 2018/1-CF.

Regarding the fresh farmed mushrooms, China would like to propose a ML of lead at 0.3 mg/kg. If the ML is set at the hypothetical level of 0.2 mg/kg, 4% of the samples in international trade will be eliminated. In the case of China, over 6% mushrooms will be rejected (Table 1). Considering the mushroom was not a relevant contributor to lead exposure. We believe it would be more appropriate to establish a ML of 0.3 mg/kg, which would just eliminate 2% of the samples in international trade.

Table 1 Occurrence of Lead in three kinds of fresh farmed mushrooms in China (mg/kg)

Food	N	Mean	P50	P90	P95	P97.5	Max	the proportion of samples exceeding the proposed MLs		
								0.1	0.2	0.3
shiitake mushrooms (<i>Lentinula edodes</i>)	1502	0.056	0.017	0.160	0.250	0.354	0.575	18.2	7.6	3.6
oyster mushrooms (<i>Pleurotus</i>)	1254	0.054	0.014	0.160	0.244	0.336	0.580	18.0	6.9	3.4
common mushrooms (<i>Agaricus bisporus</i>)	178	0.054	0.016	0.170	0.251	0.471	0.548	16.9	7.3	3.4

EUROPEAN UNION (EU)

The European Union (EU) welcomes and appreciates the work on the revision of the maximum levels for lead by the electronic Working Group led by the United States of America.

In general, the EU considers that the MLs should be lowered wherever possible. In addition, the EU would like to see a reduction of the number of very specific entries in the GSCTFF.

As regards the proposed actions for the individual commodities, the EU would like to present the following position:

For **grape juice**, the EU can support the ML of 0.04 mg/kg for grape juice.

For **processed tomato concentrates**, the EU considers that the proposed ML of lead in processed tomato concentrates should be consistent with the maximum level established for fresh tomatoes of 0,05 mg/kg. The Standard for processed tomato concentrates (Codex Stan 57-1981) foresees that tomato concentrates include "tomato puree" or "tomato paste".

- Tomato puree contains no less than 7% but less than 24% of natural soluble solids;
- Tomato paste contains at least 24% of natural soluble solids.

If fresh tomatoes are considered to contain 6% of natural soluble solids, the theoretical lead content in tomato concentrates is:

- between 0,06 mg/kg and 0,2 mg/kg for tomato purees;
- greater than or equal to 0.2 mg for tomato pastes.

As a result, a tomato concentrate, made from compliant fresh tomatoes, may be declared non-compliant. Therefore the EU cannot support the proposed ML of 0.08 mg/kg and proposes to investigate what would be the maximum lead content in highly concentrated tomato pastes, on the basis of tomatoes containing lead levels of 0.05 mg/kg. However, in order to reduce the number of entries in the GSCTFF, the EU prefers not to set an ML for processed tomato concentrates and to apply the ML for fresh tomatoes to this commodity, taking into account a processing factor.

The note in the GSCTFF for processed tomato concentrates on the adjustment of the ML, to take into account the concentration of the product, needs to be deleted.

For **mango chutney**, in view of reducing the number of very specific entries, the EU considers that it would be preferable to combine "mango chutney" with "jams (fruit preserves) and jellies". However the ML of 0.3 mg/kg for mango chutney can be supported.

For **canned Brassica vegetables**, the EU would like to comment that the ML for canned vegetables should be in line with the one for fresh vegetables. As a Codex ML of 0.3 mg/kg is set for leafy Brassica vegetables, it is proposed not to apply the ML of 0.1 mg/kg for canned Brassica vegetables to leafy canned Brassica vegetables. The EU can support to extend the current ML of 0.1 mg/kg in canned vegetables to canned Brassica vegetables, excluding canned leafy Brassica vegetables.

For **fresh farmed mushrooms** the EU can support the ML of 0.2 mg/kg with a specification in the GSCTFF of the species to which this ML applies, because for enforcement purposes it is difficult to distinguish between farmed and wild mushrooms.

For **wine**, the EU would like to comment that the data, taken into account by the electronic working group, include data on beverages other than grape wines. For the setting of MLs, the specific characteristics of certain types of wines should be considered, like the fruit which was used and whether it concerns regular or liqueur wines. The International Organisation on Vine and Wine could contribute useful data for a new lowered ML. In view of the specificities of the production process of liqueur wines, the concentration effect, and the low consumption of these wines, only by adults, the new ML should not apply to liqueur wine. The new ML should only be set for wine, excluding liqueur wine, produced from grapes harvested after the modification of the ML, in view of the long aging period and shelf life of these wines. At this stage the European Union cannot support the proposed ML of 0.05 mg/kg for wine.

However the EU can support an ML of 0.15 mg/kg for wines, produced from grapes, harvested after the modification of the ML, excluding liqueur wines.

For **salt**, the EU would like to comment that the proposed ML wouldn't cover the levels of lead present in salt from marshes. Therefore the EU can only support an ML of 1 mg/kg for salt, excluding salt from marshes

For **spreads and blended spreads** the EU can support an ML of 0.04 mg/kg.

For **edible fats and oils** the EU can support an ML of 0.07 mg/kg.

UGANDA

Uganda proposes that the revision of MLs for the selected fruits and vegetables should be postponed to CCCF13 to allow collection and evaluation of new data on lead contamination in the respective commodities. This is because lowering the MLs could have serious impacts on trade.

AFRICAN UNION (AU)

Position 1: African Union expresses reservation on the continuous lowering of maximum levels for lead in selected fruits and vegetables and other food categories without data from African Countries.