

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 20

CX/CF 22/15/19

April 2022

ORIGINAL LANGUAGE ONLY

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

15th Session

Virtual

9-13 and 24 May 2022

PRIORITY LIST OF CONTAMINANTS FOR EVALUATION BY JECFA

Comments in reply to CL 2021/88-CF

Comments of Canada, Chile, Colombia, Egypt, Kenya, Peru, Saudi Arabia, Uganda, United States of America (USA)

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2021/88-CF¹ issued in December 2021. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are attached in the **Annex** and are presented in table format.

¹ Codex circular letter, including CL 2021/88-CF, are available on the Codex webpage/Circular Letters: <http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/> or on the dedicated Codex webpage/CCCF/Circular Letters: <http://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCCF>

Annex**GENERAL COMMENTS**

COMMENT	MEMBER/ OBSERVER
Canada would like to indicate its agreement and support of the current list of contaminants and naturally occurring toxicants recommended for evaluation by JECFA. Canada does not nominate any additional substances to be considered for the JECFA priority list at this time.	Canada
Chile agradece la oportunidad de presentar observaciones sobre la lista de prioridades de contaminantes para su evaluación o reevaluación por el JECFA. Al respecto, Chile quisiera ofrecer datos de presencia de arsénico total y arsénico inorgánico en algas, crustáceos, gasterópodos, moluscos bivalvos y pescados de talla pequeña, correspondientes a estudio realizado entre los años 2019 y 2020. Por lo anterior, Chile solicita indicar forma de compartir los datos a coordinación nacional del CCCF a través del Punto de Contacto del Codex: codex@achipia.gob.cl	Chile
Colombia considera que las lista relacionadas en los anexos, se ajustan a las prioridades que deben ser revisadas en el próximo comité Codex, por lo anterior no presenta observaciones a la lista de revisión de contaminantes.	Colombia
<p>Sodium metabisulfite also called sodium pyrosulfite (Na₂S₂O₅)</p> <p><u>Rationale:</u> It is In the JECFA list Codex Stan 192 but not covering meat and poultry. The current MRLs covers only fish (shrimps, prawns and lobsters.)</p> <p>Its widely used in Kenya as a food preservative but without MRLs in meat. Cap 254 of Kenya allows its use in sausage while in the Kenya Meat Control act it allows its use in other processed meat products but Codex has not offered guidance on safe limits of its use.</p> <p>Kenya imports processed meat/poultry products from countries whose laws might permit its use, and without guidance from codex on acceptable MRLs she may be exposing her population to unsafe levels of sodium metabisulfite.</p> <p>The countries that Kenya trades with may not be contravening any Codex MRLs in terms of fair trade practices. However, Kenya having no National legislation on the compounds' use in meat and poultry and Codex has not provided on guidance, the consumer is at risk of exposure to unsafe levels.</p> <p>The gap in National laws of various countries on this compound may allow a window of its usage in some of them and not in others. There is need to come up with its MRLs.</p> <p><u>Justification:</u></p> <ol style="list-style-type: none"> 1. In compliance with Codex 2020-2025 strategic plan Goal 1 and Goal 2. 2. Complies with TOR (a) to establish or endorse permitted maximum levels or guidelines levels for contaminants and naturally occurring toxicants in food and feed; 3. In Compliance with TORs for JECFA as a contaminant where; the Committee <ul style="list-style-type: none"> (i) elaborates principles for evaluating their safety and for quantifying their risks; (ii) conducts toxicological evaluations and (v) assesses dietary exposure of populations to chemical substances in food 	Kenya

COMMENT	MEMBER/ OBSERVER
En esta ocasión, el Perú no cuenta con observaciones sobre la Lista de prioridades de contaminantes para su evaluación o reevaluación por el Comité Mixto de Expertos FAO/OMS en Aditivos Alimentarios (JECFA).	Peru
<p>Comments on item 1 " required information" as the following:</p> <p>Item 1.1: Saudi Arabia</p> <p>Item 1.2: Dioxins, Dioxin-Like Pcb</p> <p>Item 1.3: Dioxin as a chemical name that found throughout the world in the environment and they accumulate in the food chain, mainly in the fatty tissue of animals</p> <p>Item 1.4: N/A</p> <p>Item 1.5: N/A</p>	Saudi Arabia
<p>Uganda proposes inclusion of maximum limits of Cadmium in processed root vegetable juice for JECFA evaluation.</p> <p>A completed nomination form will be submitted to the Chairperson of the EWG.</p> <p style="text-align: center;">NOMINATION OF CONTAMINANTS FOR EVALUATION OR RE-EVALUATION BY JECFA</p> <p>1. <u>Required information</u></p> <p>1.1 Proposal for inclusion submitted by: Uganda</p> <p>1.2 Name of compound; chemical name(s): Cadmium: maximum limits of Cd in processed root vegetable juice (Beetroots and carrots)</p> <p>1.3 Identification of (additional) data (toxicology, metabolism, occurrence, food consumption) which could be provided to JECFA:</p> <p>Occurrence: The chemical has been found in processed fruit and vegetable juices at the following concentrations: 0.52 mg/L (mixed fruit juice), 0.63 mg/L (Beetroot juice) and 1.08 mg/L (fruit juice)</p> <p>1.4 List of countries where surveillance data are likely to be available, and if possible, name of contact person who could provide such data, including quality assurance information on the data: Uganda</p> <p>1.5 Timeline for data availability: January,2023</p> <p>2. <u>Optional detailed information</u></p> <p>2.1 Whether or not the occurrence of the compound in commodities will have potential to cause public health and/or trade problems:</p> <p>Heavy metals can be the cause of many chronic diseases whose symptoms are different depending on the level of toxicity of an element, as well as the duration and level of exposure. In the human body, Cadmium most often causes damage to organs, like the testicles, lungs and bones. In addition, it causes a carcinogenic effect, initiating cancers of the prostate, kidneys, pancreas and testicles. This element negatively affects the function of the skeletal system by disturbing the metabolism of calcium, magnesium, zinc, copper and iron ions.</p>	Uganda

COMMENT	MEMBER/ OBSERVER
<p>2.2 Whether or not commodities containing the compound are in international trade and represent a significant portion of the diet; Root vegetables such as carrots and beetroots are exported to countries within the East African region and beyond the region. Root vegetables are the main raw materials used in production of the processed root vegetable juice that would cause toxicological effects on repeated consumption/exposure to the consumers.</p> <p>2.3 Commitment that a dossier (as complete as possible) will be available for evaluation by the JECFA.</p> <p>2.4 Relevant justification and information on the following prioritization criteria¹:</p> <p>2.4.1 Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade;</p> <p>2.4.2 The needs and concerns of developing countries;</p> <p>2.4.3 The diversity of national legislations and any apparent impediments to international trade;</p> <p>2.4.4 Work already undertaken by other international organisations;</p> <p>2.4.5 The prospect of completing the work in a reasonable period of time;</p> <p>2.4.6 The impact on international trade (i.e. magnitude of the problem in international trade);</p> <p>2.4.7 Compliance with the Codex Alimentarius Commission's Strategic Plan¹ and its relevant plans of work;</p> <p>2.4.8 The quality, quantity, adequacy, and availability of data pertinent to performing a risk assessment, including data from developing countries;</p> <p>2.4.9 Compliance with CCCF's Terms of Reference¹;</p> <p>2.4.10 Compliance with JECFA's Terms of Reference²; and</p> <p>2.5 <u>Additional data/information to complement what is provided in this template:</u> Note that this point does not replace the submission of the template through the OCS. This point is complementary to the data/information provided in points 1 – 2.4.</p> <p>2.5.1 Provide relevant links through the OCS (most preferable option):and/or</p> <p>2.5.2 If the information is only available as single files, please send the files separately to the Chair of the Working Group on Priorities, United States of America (lauren.robin@fda.hhs.gov) with a copy to the US Codex Office (codex@fao.org) and the Codex Secretariat, as the files cannot be submitted through the OCS (less preferable option).</p>	
<p>The United States has no nominations to the JECFA priority list and provides the following information relevant to arsenic on the current Priority List:</p> <ul style="list-style-type: none"> • Flanigan, Timothy J.; Ferguson, Sherry A.; Law, Charles D.; Rosas-Hernandez, Hector; Cuevas-Martinez, Elvis; Fitzpatrick, Suzanne; Shen, Andrew N. 2022. "Neurobehavioral and Neurochemical Effects of Perinatal Arsenite Exposure in Sprague-Dawley Rats," Neurotoxicology and Teratology. 90:107509 • Shen, Andrew N. and Newland, Christopher M. 2021, "Methylmercury Exposure and its Implications for Aging," Chapter 20 n: Assessments, Treatments and Modeling in Aging and Neurological Disease. Elsevier Inc. pp. 213-224. • Doerge, Daniel R.; Twaddle, Nathan C.; Churchwell, Mona I.; Beland, Frederck A. 2020. "Reduction by, Ligand Exchange among, and Covalent Binding to Glutathione and Cellular Thiols Link Metabolism and Disposition of Dietary Arsenic Species with Toxicity," Environment International. 144:106086 	USA