



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Seventh Session

Moscow, Russian Federation, 8 – 12 April 2013

PROPOSED DRAFT REVISION OF GUIDELINE LEVELS FOR RADIONUCLIDES IN FOODS

Comments at Step 3 submitted by Costa Rica, European Union, Ghana, India, USA and African Union

COSTA RICA

Costa Rica welcomes the opportunity to provide comments on document CX/CF 13/7/6 Proposed draft revision of guideline levels for radionuclides in foods.

Costa Rica supports the recommendation of the electronic Working Group about not changing the current approach of guideline levels (GLs) for groups of radionuclides which are assessed independently without changing the current values.

In the same way, Costa Rica supports the discussion of the GLs for potable water in emergency situations.

EUROPEAN UNION

The European Union (EU) would like to thank the Netherlands and Japan for leading the work on the guideline levels for radionuclides. The EU would like to submit the following comments.

The EU agrees with the conclusion of the eWG that there is no need to change the current Guideline Levels into Maximum Levels and that a risk assessment by JEFCA is not needed. The EU considers that the set of GLs adopted in 2006 remains robust and agrees with the conclusion of the eWG to maintain the current GLs, food categories and groups of radionuclides. The EU therefore supports the recommendation of the eWG to discontinue the work on the revision of the GLs for radionuclides in the GSCTFF.

The EU agrees with the approach to exclude radionuclides of natural origin from the setting of guideline levels. However the EU is of the opinion that it is appropriate to continue monitoring the presence of radionuclides of natural origin and to assess the potential risk for public health.

Concerning the recommendation to discuss the inclusion of GLs for drinking water, the EU considers that drinking water as such (except bottled water) does not represent a real problem for international trade. In fact, for many countries a substantial fraction of drinking water originates as ground water and will not suffer direct contamination from fallout. In addition, the grid of interconnection between reservoirs would provide in most cases for switching to supply uncontaminated water to any region which has been affected by a nuclear accident. Thus, it is more likely that there would be no general contamination of supplies. The EU therefore does not see a need for establishing GLs for drinking water.

With regard to the recommendation of the eWG not to change the annexes to the current GLs but to develop guidance to facilitate the interpretation and implementation of the Codex GLs, the EU agrees with this way to go forward. The principles developed in Chapter 6 of ICRP¹ Publication 111² on the "Management of contaminated foodstuffs and other commodities" could be a good basis for the revision of the current "Fact Sheet of the Codex Secretariat of May 2011".

GHANA

Comment: Ghana is in support of the recommendation that the Committee should consider discontinuing the work on the revision of GLs for radionuclides in the GSCTFF.

¹ *International Commission on Radiological Protection*

² *ICRP Publication 111 "Application of the Commission's Recommendations to the Protection of People Living in Long-term Contaminated Areas after a Nuclear Accident or a Radiation Emergency"*

We also support the suggestion that the concept of GLs for potable (drinking) water in emergency situations should be discussed at the next CCCF session.

Ghana supports the opinion that the next CCCF session should continue the work on the guidance to facilitate the interpretation and implementation of the Codex GLs on radionuclides.

We would also like to propose that chronic situations that are likely to contaminate the environment and hence the food chain should receive some attention and possible guidance on intervention measures.

INDIA

- The recommendation of eWG not to change the current GLs of radionuclides in foods into MLs, and not to change the present approach using GLs for group of radionuclides to be assessed independently, and not to change the current values, is acceptable. Further, it is noted that IAEA Secretariat has proposed to establish a working group for developing a Technical Document (TECDOC), as a step toward harmonized information on existing National and International Standards on radioactive substances in food & drinking water. This proposed document will be able throw light on associated risks & availability of data for risk assessment for radionuclides and will be helpful in scientifically assessing the requirements of revision of GLs & change to MLs.
- Recommendations of eWG under bullet 2&3 of para 27 are also acceptable.

USA

- The US agrees with recommendations of the eWG:
 - Not to change current Guideline Levels (GLs) to Maximum Levels (MLs) for radionuclides in foods because GLs provide countries flexibility to determine whether and under what conditions food can be distributed within their territory or jurisdiction,
 - Not to change the current approach using GLs for groups of radionuclides to be assessed independently, and
 - Not to change the current values.
- Agrees with the recommendation of the eWG to discontinue work on revision of GLs for radionuclides in the GSCTFF because no changes are needed.
- Agrees with the recommendation of the eWG not to revise annexes in the General Standard for Contaminants and Toxins in Food and Feed but to use the Fact Sheet on Codex Guidelines Levels for Radionuclides in Foods Contaminated Following a Nuclear or Radiological Emergency prepared by the Codex Secretariat³ as a guidance document, modified as necessary, to provide assistance to countries for interpreting and implementing the use of Codex GLs (e.g., clarification of basic choices and constants, better define minor foods).
- Supports the use of WHO Guidelines for Drinking Water Quality, not Codex GLs, to assess the safety of radionuclides in drinking water.

AFRICAN UNION

<p>African Union did not have access to the draft guideline levels but support the review of the current guideline levels for radionuclides in food and provision of a clear guidance on the interpretation and application of the guideline levels.</p> <p>However, when the document is uploaded, we recommend that NCCP should consider it in consultation with Atomic Energy Agencies or relevant bodies of their countries.</p>	<p>The present guideline does not include all radionuclides. It includes only 20 radionuclides contained in nuclear installations or used as radiation source which can be accidentally discharged into the environment in large quantities and consequently raising levels in foods. Meanwhile, the ubiquitous radionuclides of natural origin are completely excluded in the document. Similarly in the formulation of the guideline, foods consumed in small quantities were not taken into cognisance.</p> <p>Consequently, the document provides guidance for food destined for human consumption contaminated by radionuclides from nuclear and radiological emergency and is therefore not applicable to normal situations and foods eaten in small quantities such as spices. The revision of the guideline will be beneficial to Africa as we are exposed mostly to radionuclides of natural origin.</p>
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³ Fact Sheet on Codex Guidelines Levels for Radionuclides in Foods Contaminated Following a Nuclear or Radiological Emergency- Prepared by Codex Secretariat (2 May 2011). Available at: <http://www.fao.org/crisis/27242-0bfef658358a6ed53980a5eb5c80685ef.pdf>