CODEX ALIMENTARIUS COMMISSION E

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 5 **CX/CF 15/9/5-Add.1**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

9th Session

New Delhi, India, 16 – 20 March 2015

DRAFT AND PROPOSED DRAFT REVISION OF MAXIMUM LEVELS IN SELECTED COMMODITIES IN THE GENERAL STANDARD FOR CONTAMINANTS AND TOXINS IN FOOD AND FEED (CODEX STAN 193-1995)

(Prepared by the Electronic Working Group led by United States of America)

Comments submitted at Step 3 and 6 by Argentina, Chile, Egypt, Ghana, Thailand, USA, AU and ICBA

ARGENTINA

Argentina has reviewed the text and has no comments to make on this document

CHILE

Chile supports the reduction and control of lead in food. However, we consider there is a need for more background information in order to establish such maximum levels, and thus we suggest keeping the document at Step 3.

EGYPT

Egypt supports the recommendations of EWG which protects the health of consumers.

GHANA

COMMENT

Ghana does not support the lowering of maximum levels of lead in the selected commodities without data from Africa.

RATIONALE

In preparing this document the EWG proposed MLs that will provide the highest level of reduction in lead level without having too significant adverse impact on international trade. The recommended MLs were not based on exposure or consumption rates. Of the 20, 285 set of raw data and 17221 of LOQ-limited dataset used in arriving at these proposed MLs, absolutely none is from Africa.

THAILAND

Thailand appreciates the works done by the United State of America and would like to submit comments to the draft and proposed draft revision of the MLs for lead in selected commodities as follows:

We can agree to the draft MLs for lead in commodities as followed:

- Fruit juices and nectar, ready-to-drink (excluding juices from berries and other small fruits) at 0.03 mg/kg;
- Canned fruits (excluding berries and other small fruits) at 0.1 mg/kg;
- Canned vegetables (excluding canned brassica, leafy, and legume vegetables at 0.1 mg/kg;
- Berries and other small fruits at 0.1 mg/kg.

Also, we think that if the Committee could reach an agreement to lower the MLs of berries and other small fruits to 0.1 mg/kg, the MLs of juices from berries and other small fruits should be reviewed as well for consistency due to the fact that the MLs for lead in fruit juice is related to fresh fruit.

For the recommendations for lowering the MLs in legume vegetables; brassica vegetables; fruiting vegetables, cucurbits; and fruiting vegetables, other than cucurbits, we would like to request the electronic working group to break down the occurrence of lead in each commodities in order to support decision made by the Committee.

USA

- The U.S. agrees with the recommendations made by the eWG to revise or maintain maximum levels (MLs) as follows:
    - Fruit juices and nectars, ready-to-drink (excluding juices from berries and other small fruits): Consider lowering the ML to 0.03 mg/kg from 0.05 mg/kg.
    - Canned fruits (excluding berries and other small fruits) and canned vegetables (excluding canned brassica, leafy, and legume vegetables): Consider lowering the MLs to 0.1 mg/kg from 1.0 mg/kg.
    - Berries and other small fruits: Consider lowering the ML to 0.1 mg/kg from 0.2 mg/kg. Consider whether the existing ML should be retained for certain berry types (cranberry, currant, elderberry).
    - Legume vegetables: Consider lowering the ML to 0.1 mg/kg from 0.2 mg/kg.
    - Brassica vegetables: Consider lowering the ML to 0.1 mg/kg from 0.3
    - 2 mg/kg.
    - Fruiting vegetables, cucurbits: Consider lowering the ML to 0.05 mg/kg from 0.1 mg/kg.
    - Fruiting vegetables, other than cucurbits: Consider lowering the ML to 0.05 mg/kg from 0.1 mg/kg, but excluding fungi and mushrooms.

AFRICAN UNION

RECOMMENDED AFRICAN POSITION	RATIONALE
AU DOES NOT SUPPORT THE LOWERING OF MAXIMUM LEVELS OF LEAD in the selected commodities without data from Africa. The following were the recommended MLs: 0.03mg/kg for fruit juices and nectars, ready-to-drink (excluding juices from berries and other small fruits); 0.1mg/kg for canned fruits (excluding berries and other small fruits) and canned vegetables (excluding canned brassica, leafy, and legume vegetables): and 0.1mg/kg for Berries and other small fruits. Others include 0.1mg/kg for both legume and brassica vegetables and 0.05mg/kg for both fruiting vegetables cucurbits and other than cucurbits excluding mushroom and fungi.	For reminder, the work on revision of MLs started at the 6th session of CCCF in 2012 where it was agreed that the maximum levels (MLs) for lead in fruit juices, milk and milk products, infant formula, canned fruits and vegetables, fruits, and cereal grains (except buckwheat, cañihua and quinoa) in the General Standard for Contaminants and Toxins in Food and Feed (GSCTFF) be revised. The Committee also agreed to consider consolidating the MLs for canned fruit and vegetable products. Subsequently, the 7th and 8th sessions retained MLs in the commodities but demanded for the revision of MLs for lead in fruit juice and nectars, canned fruits and vegetables, berries and small fruits, legume vegetables, brassica vegetables, fruiting vegetables (cucurbits) and fruiting vegetables (other than cucurbits) for consideration at the 9th session. The current document was therefore prepared by an EWG led by United States of America. In preparing this document the EWG proposed MLs that will provide the highest level of reduction in lead level without having too significant adverse impact on international trade. The recommended MLs were not based on exposure or consumption rates. Of the 20, 285 set of raw data and 17221 of LOQ-limited dataset used in arriving at these proposed MLs, absolutely none is from Africa. The reason for setting MLs is to protect the health of the consumer worldwide but when occurrence data used to revise MLs have narrow geographical representation then the objective of setting world standards is defeated.

ICBA

ICBA comments concern the proposed revised maximum level (ML) for lead in fruit juice and nectars.

Para 44. Recommendation 1:

Fruit juices and nectars, ready-to-drink (excluding juices from berries and other small fruits): Consider lowering the ML to 0.03 mg/kg.

ICBA agrees with the recommendation and supports lowering the maximum level to 0.03 mg/kg in fruit juices and nectars, ready-to-drink (excluding juices from berries and other small fruits for which the current ML of 0.05 mg/kg would remain).