

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda item 4.4

CX/CAC 25/48/6 Add.1

October 2025

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-eighth Session

FAO headquarters

Rome, Italy

10-14 November 2025

COMMENTS ON THE DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 18TH SESSION OF CODEX COMMITTEE ON CONTAMINANTS IN FOODS FOR ADOPTION BY THE 48TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

BACKGROUND

1. This document compiles the comments on the standards and related texts submitted to CAC48 for final adoption, as indicated in the relevant circular letter (CL 2025/64-CAC). The comments include those received through the Codex Online Commenting System (OCS)¹, or via email by the time this document was issued. The comments are as shown in Appendix I.

EXPLANATORY NOTES ON APPENDIX I

2. The comments received are presented in a table format, with two columns as follows:
 - **First column** – Presents the comments with the rationale.
 - **Second column** – Presents the provider of the comments (name of Member or Observer).

¹ OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

Appendix I

COMMENTS IN REPLY TO CL 2025/64-CAC

Submitted by

Costa Rica, Cuba, Egypt, Iraq, New Zealand, Paraguay, United States of America (USA), Zambia

COMMENT	MEMBER / OBSERVER
Adoption at Step 8: Maximum level (ML) of 2.5 mg/kg for lead in spices, dried bark for inclusion in the General standards for contaminants and toxins in food and feed (CXS 193-1995), REP25/CF18, paragraph 47(i)(a), Appendix III Adoption at Step 5/8: ML of 2.0 mg/kg for lead in culinary herbs, dried for inclusion in CXS 193-1995, REP25/CF18, paragraph 47(i)(b), Appendix III.	
Costa Rica supports.	Costa Rica
Cuba agradece la oportunidad de poder emitir sus criterios a esta carta circular y en principio apoyamos los niveles máximos de plomo en especies y corteza , así como en hierbas culinarias	Cuba
Egypt appreciates the work and efforts done in this document by CCCF and in this regard we have some comments related to the following ; Firstly ; For MLs for contaminants in foods : Egypt imports significant quantities of spices, particularly dried bark spices (cinnamon) and dried culinary herbs include celery, dill, mint, thyme, among others, and noting that many consumers use those spices as hot beverages, Egypt recommends the following ML: Dried Bark: The maximum level (ML) for lead in this type of spices is reduced to 2.0 mg/kg. Dried Culinary Herbs: The maximum level (ML) for lead in these products is reduced to 1.5 mg/kg. Scientific reasons: 1. High and direct consumption, as these food products are consumed directly and in large quantities and are added to different food items by wide segments of the population, including children and the elderly. 2. Any increase in the limits will lead to higher daily exposure to lead, posing a significant health risk, especially with lead accumulation in the body and its adverse effects on the nervous system and mental development of children. 3. The World Health Organization (WHO) and international bodies affirm that there is no completely safe level of lead exposure, and that any reduction in exposure has a positive impact on public health.	Egypt
Agree with MLs for contaminants in foods i & ii	Iraq
New Zealand supports the adoption of the ML of 2.5 mg/kg for lead in spices, dried bark (at Step 8), and the ML of 2.0 mg/kg for lead in culinary herbs, dried (at Step 5/8) for inclusion in the General standards for contaminants and toxins in food and feed (CXS 193-1995);	New Zealand
The United States supports adoption at step 8 of the ML of 2.5 mg/kg for lead in spices, dried bark. The United States supports adoption at step 5/8 of the ML of 2.0 mg/kg for lead in culinary herbs, dried.	USA

Zambia supports the adoption at Step 8 of the ML of 2.5 mg/kg for lead in spices and dried bark under CXS 193-1995 and adoption at Step 5/8: ML of 2.0 mg/kg for lead in culinary herbs, dried for inclusion in CXS 193-1995, REP25/CF18, paragraph 47(i)(b), Appendix III. Zambia recognizes the adoption at Step 8 of the Maximum Level (ML) of 2.5 mg/kg for lead in spices and dried bark for inclusion in the Codex General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995) as an important milestone for both public health protection and facilitation of international trade. Public Health protection Lead is a toxic heavy metal with no safe level of exposure, which has been linked to serious health effects including neurological impairment in children, reduced cognitive development, among other effects. Spices and dried bark are commonly consumed in Zambia, making them a potential source of chronic lead exposure. Adoption of the ML will protect consumer health by ensuring that spices available in both domestic and international markets meet acceptable safety levels. Trade and Economic reasons Zambia is committed to expanding its agricultural exports, including spice products, to regional and international markets. Codex-aligned MLs will promote harmonization of standards, reduce technical barriers to trade, and improve Zambia's competitiveness in global markets. Adoption of these MLs will minimize the risk of export rejections due to contamination, protect the reputation of Zambian products and supporting smallholder farmers who depend on spice cultivation. Regulatory Benefits The MLs will provide Zambia with a clear regulatory benchmark for monitoring and controlling lead levels in spices and dried bark. They will also strengthen enforcement capacity and align with Zambia's commitment to Codex standards as a basis for food safety regulation. Further, it will encourage Good Agricultural and Good Manufacturing Practices (GAP/GMP) among producers, contributing to safer food systems and sustainable agricultural development. Zambia supports the adoption at Step 5/8 of the Maximum Level (ML) of 2.0 mg/kg for lead in dried culinary herbs for inclusion in the Codex General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995) (REP25/CF18, para. 47(i)(b), Appendix III). Public Health Protection Lead is a toxic heavy metal with no safe level of exposure, especially harmful to children and vulnerable populations. Culinary herbs are widely used in Zambian household diets and food processing, making them a potential route of chronic lead exposure if not controlled. Setting an ML ensures safer food supplies and aligns with Zambia's priority to reduce population exposure to contaminants. Trade and economic reasons Zambia is working to expand its agricultural exports, including herbs and related products. A Codex ML provides a harmonized international benchmark, reducing risks of trade disputes and rejected consignments in importing markets. It will also strengthen Zambia's competitiveness and protect the reputation of its products in regional and global markets. Regulatory Benefits The standard offers a clear enforcement tool for monitoring and controlling lead contamination in dried herbs by food inspectors across the country. It encourages GAP/GMP within Zambia's food value chains, supporting safer production and compliance with international requirements	Zambia
---	----------------------

COMMENT	MEMBER / OBSERVER
Adoption at Step 5/8: Revised Code of practice for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004), REP25/CF18, paragraph 80(i), Appendix V.	
Costa Rica supports.	Costa Rica
además apoyamos la adopción en el tramite 5/8 del Código de prácticas para prevenir y reducir la contaminación en el maní por aflatoxinas (CXC 55-2004), REP25/CF18, párrafo 80 i), Apéndice V.	Cuba
secondly , For the Code of Practice : Egypt agrees to advance this draft for final adoption by the CAC48.	Egypt
agree to adoption at step 5/8 : Revised Code of practice for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004), REP25/CF18, paragraph 80(i), Appendix V.	Iraq
Supports the adoption of the revised Code of practice for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004) at Step 5/8.	New Zealand
Paraguay apoya la adopción de la Revisión del Código de prácticas para prevenir y reducir la contaminación del maní (cacahuete) por aflatoxinas (CXC 55-2004).	Paraguay
The United States supports adoption at step 5/8 of the revised Code of practice for the prevention and reduction of aflatoxin contamination in peanuts (CXC 55-2004).	USA
Aflatoxin contamination in peanuts is a serious food safety concern in Zambia with public health and trade implications. Zambia recognizes the importance of strengthening preventive measures throughout the production, storage, and distribution chain to reduce contamination risks. Public Health protection Aflatoxins are potent carcinogens and can cause liver cancer, immune suppression, and stunted growth in children. Peanuts are widely consumed in Zambia as a staple food, particularly among vulnerable populations and it is mostly used to mix with porridge for children as supplementary food. Therefore, adoption of the revised Code of Practice provides updated and science-based guidance to minimize exposure and protect consumers' health. Trade and economic reasons Zambia seeks to expand peanut production for both domestic consumption and export markets. Aflatoxin contamination is a major barrier to trade, with strict limits imposed by importing countries, especially in the EU and regional markets. Implementing the revised COP will help Zambia's peanut sector meet international safety requirements, thereby reducing rejection of exports and improving market access. Regulatory Benefits The revised COP provides a comprehensive framework for best practices covering production, harvesting, post-harvest handling, storage, and processing. It supports capacity building for farmers, processors, and regulators, fostering compliance with Codex standards. Therefore, adoption of this COP will align Zambia's national policies with Codex guidance, strengthening the country's food safety system and supporting small	Zambia