

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 4.4

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 17TH SESSION OF THE CODEX COMMITTEE ON CONTAMINANTS IN FOODS FOR ADOPTION BY THE 47TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

BACKGROUND

1. This document compiles the comments on the draft standards submitted at Step 5/8 and Step 5 of the Procedure and other matters as indicated in the relevant Circular Letter ([CL 2024/77-CAC](#)). The comments are those received through the Codex Online Commenting Systems (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.

**REQUEST FOR COMMENTS
ON THE STANDARDS AND RELATED TEXTS SUBMITTED BY THE 17TH SESSION OF THE CODEX
COMMITTEE ON CONTAMINANTS IN FOODS FOR ADOPTION BY THE 47TH SESSION OF THE
CODEX ALIMENTARIUS COMMISSION**

(STEP 5/8 AND STEP 5)

COMMENTS IN REPLY TO CL 2024/77-CAC

*Comments by Chile, Costa Rica, Ecuador, Egypt, European Union, Iraq, New Zealand, Paraguay, Peru,
United Arab Emirates, United States of America and Zambia*

COMMENT	MEMBER / OBSERVER
<p>Chile agradece la oportunidad de presentar observaciones sobre las normas y textos afines presentados por el Comité del Codex sobre Contaminantes de los Alimentos, en su 17.^a reunión, con miras a su adopción por la Comisión del Codex Alimentarius en su 47.^o período de sesiones.</p> <p>Chile revisó los asuntos planteados por esta carta circular y al respecto, quisiera emitir el siguiente comentario:</p> <ul style="list-style-type: none"> - Chile considera que los niveles máximos, el código de prácticas y los planes de muestreo mencionados en la carta circular CL 2024/77-CAC están listos para su adopción por la Comisión del Codex Alimentarius en su 47.^o período de sesiones, considerando que hubo amplio consenso en la plenaria sostenida por el CCCF17. 	<p>Chile</p>
<p>Adopción en el trámite 5/8: Plomo en especias, arilo seco; semillas secas (incluido un NM separado para las semillas de apio); rizomas y raíces secos; partes florales secas; y especias, frutas secas y bayas (incluidos NM separados para la pimienta de Sichuan, el anís estrellado, el pimentón dulce y el zumaque), REP24/CF17, párrafo 61 i), incisos a-d, f-i, Apéndice II.</p> <p>Costa Rica apoya el avance al trámite 5/8</p> <p>Adopción en el trámite 5: Plomo en corteza seca y hierbas culinarias secas, REP24/CF17, párrafo 61 i), incisos e, j, Apéndice II.</p> <p>Costa Rica apoya el avance al trámite 5</p> <p>Adopción: Plomo y cadmio en la quinua, REP24/CF17, párrafo 119, Apéndice VII.</p> <p>Costa Rica apoya la adopción.</p> <p>Adopción en el trámite 5/8: Plan de muestreo de metilmercurio en el pescado ratificados por el Comité del Codex sobre Métodos de Análisis y Toma de Muestras en su 43.^a reunión¹, párrafos 12 i) y 20 i), y Apéndice II de REP24/MAS43.</p> <p>Costa Rica apoya la adopción al trámite 5/8</p> <p>Adopción en el trámite 5: Planes de muestreo para las aflatoxinas totales y la ocratoxina A en algunas especias (chile y pimentón dulce secos, y nuez moscada) REP24/CF17, párrafo 92 i), Apéndice IV.</p> <p>Costa Rica apoya el avance al trámite 5</p>	<p>Costa Rica</p>
<p>En respuesta a la CL 2024/77-CAC, y en concordancia a la 17ma reunión del Comité del Codex sobre Contaminantes de los Alimentos, Ecuador desea agradecer el trabajo realizado y apoya la adopción de un NM de 0,15 mg/kg para el cadmio y de 0,2 mg/kg para el plomo en la quinua (producto entero), es importante tomar en cuenta que en el Comité hubo apoyo general al establecimiento de NM para el cadmio y el plomo separados de los cereales</p>	<p>Ecuador</p>

<p>en grano; considerando que la norma del Codex para productos pertinente es la CXS 333-2019</p> <p>Adopción en el trámite 5/8: Código de prácticas para prevenir y reducir la intoxicación ciguatera, REP24/CF17, párrafo 97 i), Apéndice V.</p> <p>En respuesta a la CL 2024/77-CAC, y en concordancia a la 17ma reunión del Comité del Codex sobre Contaminantes de los Alimentos, Ecuador desea agradecer el trabajo realizado y apoya remitir el Código de prácticas para prevenir y reducir la intoxicación ciguatera, para su adopción en el trámite 5/8.</p>	
<p>MLs for contaminants in foods Egypt agrees with the document, and suggests the following MLs : 1.5 mg/kg for dried rhizomes and roots and 1.0 mg/kg for dried floral parts.</p> <p>Adoption at Step 5/8: Code of practice for the prevention and reduction of ciguatera poisoning, REP24/CF17, paragraph 97(i), Appendix V Egypt agrees to adopt the code of practice by CAC 47</p> <p>Adoption at Step 5/8: Sampling plan for methylmercury in fish as endorsed by the 43rd Session of the Codex Committee on Methods of Analysis and Sampling, REP24/MAS43², paragraphs 12(i) and 20(i), Appendix II of REP24/MAS43.</p> <p>Egypt agrees to adopt of the sampling plans by CAC 47</p>	Egypt
<p>Adoption at Step 5/8: Lead in spices, dried aril; dried seeds (including a separate ML for celery seeds); dried rhizomes and roots; dried floral parts; and spices, dried fruit and berries (including separate MLs for Sichuan pepper, star anise, paprika, and sumac), REP24/CF17, paragraph 61(i)(a-d, f-i), Appendix II.</p> <p>The European Union (EU) reiterates its reservations expressed in CCCF17 concerning certain MLs for lead in spices:</p> <ul style="list-style-type: none"> Spices, dried celery seeds: 1.5 mg/kg The EU cannot agree on this ML as a lower ML (0.9 mg/kg) would be more appropriate based on the As Low as Reasonably Achievable (ALARA) principle and the relevant available data. Spices, dried rhizomes, and roots (including galangal): 2.0 mg/kg The EU cannot agree on this ML as, considering the ALARA principle and with a view of protecting consumer health, a lower ML of 1.5 mg/kg would be more appropriate on the basis of available data. Spices, dried floral parts: 2.5 mg/kg The EU cannot agree on this ML considering the ALARA approach and that, based on the relevant available data for saffron and capers, an ML of 1.0 mg/kg would be more appropriate. According to EU data the concentration of lead in cloves appears to be below 0.5 mg/kg, so the few samples with concentrations above 2 mg/kg can be considered to be outliers. Spices, dried Sichuan pepper and star anise: 3.0 mg/kg The EU cannot agree on this ML, noting that based on data available in the EU, a lower ML of 0.6 mg/kg for star anise could be established 	European Union
<p>Agree with the proposal</p>	Iraq
<p>New Zealand supports the adoption of the MLs for contaminants in foods, the code of practice and the sampling plans (REP24/CF17, Appendix II, IV, V, VII, and Appendix II of REP24/MAS43).</p>	New Zealand
<p>Paraguay apoya la adopción final y la adopción en trámite 5 de los documentos mencionados en la CL 2024/77.</p>	Paraguay

Perú expresa su apoyo para la adopción en el trámite 5/8.	Peru
<p>Regarding the invitation to provide comments on the standards and related texts submitted by the CCCF17 for adoption by CAC47, United Arab Emirates UAE considered the below mentioned MLs, code of practice, and sampling plans:</p> <ul style="list-style-type: none"> - MAXIMUM LEVELS FOR LEAD IN CERTAIN FOOD CATEGORIES - MAXIMUM LEVELS FOR LEAD AND CADMIUM IN QUINOA - CODE OF PRACTICE FOR THE PREVENTION OR REDUCTION OF CIGUATERA POISONING - SAMPLING PLAN FOR METHYLMERCURY CONTAMINATION IN FISH - SAMPLING PLAN FOR TOTAL AFLATOXINS AND OCHRATOXIN A IN NUTMEG, DRIED CHILLI AND PAPRIKA <p>are ready for adoption, with general proposed comment regarding the differentiation between the terms dried and dehydrated, since they are not synonymous, especially regarding the maximum allowed limits of moisture, therefore it is suggested to define each term separately in the 1.4 METHODS FOR DETECTION OF IRRADIATED FOODS, for example to mention that the term dried means that the product with no more than % Moisture, while the term dehydrated means that the product with no more than % Moisture.</p>	United Arab Emirates
<p>Adoption at Step 5/8: Lead in spices, dried aril; dried seeds (including a separate ML for celery seeds); dried rhizomes and roots; dried floral parts; and spices, dried fruit and berries (including separate MLs for Sichuan pepper, star anise, paprika, and sumac), REP24/CF17, paragraph 61(i)(a-d, f-i), Appendix II. The United States supports final adoption of the MLs at Step 5/8.</p> <p>Adoption at Step 5: Lead in dried bark and dried culinary herbs, REP24/CF17, paragraph 61(i)(e, j), Appendix II. The United States supports interim adoption of MLs of 2.5 mg/kg for lead in spices, dried bark, and lead in dried culinary herbs at Step 5.</p> <p>Adoption: Lead and cadmium in quinoa, REP24/CF17, paragraph 119, Appendix VII. The United States supports adoption of the MLs.</p> <p>Adoption at Step 5/8: Code of practice for the prevention and reduction of ciguatera poisoning, REP24/CF17, paragraph 97(i), Appendix V The United States supports final adoption of the Code of Practice at Step 5/8 and publication of the information document on the Committee website.</p> <p>Adoption at Step 5/8: Sampling plan for methylmercury in fish as endorsed by the 43rd Session of the Codex Committee on Methods of Analysis and Sampling, REP24/MAS43², paragraphs 12(i) and 20(i), Appendix II of REP24/MAS43. The United States supports final adoption of the sampling plan with the revised decision rule at Step 5/8.</p> <p>Adoption at Step 5: Sampling plan for total aflatoxins and ochratoxin A in certain spices (dried chili pepper and paprika, and nutmeg), REP24/CF17, paragraph 92(i), Appendix IV The United States supports interim adoption of the sampling plan at Step 5 and extension of the timeline for completion of the work.</p>	USA

<p>i. Zambia supports the lower range of maximum levels of 2mg/kg in Spices, dried bark of Cinnamon, canella, cassia and Spices, dried floral parts of Saffron, Cloves, Capers and further supports the Maximum levels provided for other spices, seeds and culinary herbs. Lead is metal of serious public health concern and the setting of maximum levels will ensure protection of the consumer from adverse health effects. For Sichuan pepper, Zambia is expresses concern that the data submitted did not have geographical representation. Therefore , we propose that standards be held at step 5 to allow other countries to submit more data.</p> <p>ii. - Zambia proposes that the standards be held at Step 5 to allow for more data to be submitted by countries and data submitted was not representative of the members especially those producing spices.</p> <p>iii. Zambia does not consume Quinoa in such high amounts, however, there is still need to have ML for quinoa, except it may just need to be added to the already existing group of cereals to which MLs already exist considering quinoa is in the group of cereals. There maybe considering for data generation from countries producing quinoa.</p> <p>Code of Practice Zambia proposes adoption of the standard at step 5/8 as this is important to ensure safe food. Zambia not only produces fish but also imports from various regions. Having a code of practice will also strengthen surveillance and ensure prevention measures are put in place.</p> <p>Sampling plans</p> <p>i. Zambia proposes that the standards be adopted at step 5 and further requests that there be call for data. This is because the data submitted was not sufficient and there is need to have more information and more research to be done</p> <p>ii Zambia proposes adoption of the standard at step 5 to allow submission of more data to support scientific evidence</p>	<p>Zambia</p>
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