

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CL 2021/90-CF
December 2021

TO: Codex Contact Points
Contact Points of international organizations having observer status with Codex

FROM: Secretariat, Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme

SUBJECT: Request for comments (prioritization) on the review of Codex standards and related texts for
contaminants in food and feed

DEADLINE: 25 March 2022

BACKGROUND

1. For background information on the systematic review of Codex standards and related texts to determine the need for their revision, please refer to the discussion held and decisions made at the 14th Session of the Codex Committee on Contaminants in Foods (2021)¹ available in the report of the 14th Session of the Committee on the CCCF14 webpage².

REQUEST FOR COMMENTS

2. Codex members and observers are invited to provide comments on the tracking lists in Annex I using the prioritization criteria in Annex II. In providing comments on the tracking list in order to prioritize Codex standards and/or related texts for review by CCCF, Codex members and observers are invited to also take into account the following circular letters:
 - CL 2021/87-CF on the approach/methodology for the review of contaminant/staple food combinations for future work of CCCF (Forward work-plan for CCCF),
 - CL 2021/88-CF on the prioritization of contaminants for evaluation and/or re-evaluation by JECFA, and
 - CL 2021/89-CF on the follow-up to the outcomes of JECFA evaluations and FAO/WHO expert meetings

Comments on the tracking lists (Annex I) that also consider the above CLs will assist CCCF in better assessing its future work vis-à-vis ongoing work and to more strategically address on new work on Codex standards and related texts for contaminants in food and feed.

3. Comments submitted in reply to this Circular Letter will be considered by the Working Group on the “Review of Codex standards and related texts” that will meet prior to CCCF15 (2022) to prepare recommendations for consideration by CCCF15.

GUIDANCE ON THE PROVISION OF COMMENTS

4. Comments should be submitted through the Codex Contact Points of Codex members and observers using the OCS.
5. Contact Points of Codex members and observers may login to the OCS and access the document open for comments by selecting “Enter” in the “My reviews” page, available after login to the system.
6. Other OCS resources, including [Frequently Asked Questions \(FAQ\)](#), as well as the user manual and short guide, can be found at the following link: <http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>.
7. For questions on the OCS, please contact Codex-OCS@fao.org.

¹ REP21/CF, paras. 211-218

² <https://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCCF&session=14>

ANNEX I**TRACKING LISTS OF CODEX STANDARDS AND RELATED TEXTS¹ FOR CONTAMINANTS
PRIORITIZATION FOR POSSIBLE REVIEW****For comments**

1. Please prioritize contaminants listed in Lists A and B and include the rationale for such prioritization based on the information presented in the lists below and the criteria provided in Annex II of CL 2021/90-CF as follows:
 - i. Priority for review for contaminants established or reviewed ≥ 25 years ago (1996 and earlier) (List A.1)
 - ii. Priority for review for contaminants established or reviewed ≥ 15 and < 25 years ago (between 1997 and 2006) (List A.2)
 - iii. Priority for review for contaminants recommended for re-evaluation (List B)
 - iv. Priority for review for contaminants in food and feed: Based on the prioritization proposed under points i to iii, above, please provide a single list of prioritized contaminants for review by CCCF.
2. Please indicate whether your country is willing to lead or co-lead some of the items identified as priority (if appropriate).

¹ All Codex standards and related texts for contaminants are available on the Codex webpages:

Codex webpage/Codex texts:

<https://www.fao.org/fao-who-codexalimentarius/codex-texts/en/>

Codex webpage/CCCF/Related standards:

<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-standards/en/?committee=CCCF>

List A: Codex Contaminant Standards Established or Reviewed ≥25 and ≥15 and >25 Years Ago

Contaminant	Food(s) ^a	Type of Standard ^b	Year Established ^c	Corresponding Standard ^b	
A.1 Established or Reviewed ≥25 years ago (1996 and earlier)					
Vinyl chloride monomer	Food	GL	1991	n/a	
Acrylonitrile	Food	ML	1991	n/a	
Arsenic, total	Edible fats and oils	ML	<1980	n/a	
	Fat spreads and blended spreads	ML	2007		
	Salt, food grade	ML	1987		
Cadmium	Salt, food grade	ML	1987	n/a	
Tin, total	Cooked cured chopped meat	ML	1981	CoP: CXC 60-2005	
	Cooked cured ham	ML	1981		
	Cooked cured pork shoulder	ML	1981		
	Corned beef	ML	1981		
	Luncheon meat	ML	1981		
A.2 Established or Reviewed ≥15 and <25 years ago (between 1997 and 2006)					
Aflatoxin M ₁	Milks	ML	2001	CoP: CXC 45-1997	
Cadmium	Cereal grains	ML	2001	n/a	
	Legume vegetables	ML	2001		
	Pulses	ML	2001		
	Cadmium	Brassica vegetables	ML	2005	n/a
		Bulb vegetables	ML	2005	
		Fruiting vegetables	ML	2005	
		Leafy vegetables	ML	2005	
		Root and tuber vegetables	ML	2005	
		Stalk and stem vegetables	ML	2005	
		Wheat	ML	2005	
		Cephalopods	ML	2006	
		Marine bivalve molluscs	ML	2006	
		Rice, polished	ML	2006	
Patulin	Apple juice	ML	2003	CoP: CXC 50-2003	
Aflatoxin B ₁	Raw Materials and Supplemental Feedingstuffs for Milk-Producing Animals (CXC 45-1997)	CoP	1997	ML	
Contamination (general)	Concerning Source Directed Measures to Reduce Contamination of Foods with Chemicals (CXC 49-2001)	CoP	2001	n/a	
Patulin	Apple Juice and Apple Juice Ingredients in Other Beverages (CXC 50-2003)	CoP	2003	ML	
Aflatoxin	Peanuts (CXC 55-2004)	CoP	2004	ML	
Tin, inorganic	Canned Foods (CXC 60-2005)	CoP	2005	MLs	

n/a – not applicable

a - Refer to GSCFF for specific exclusions and other details.

b - Standards referred to include: Maximum Level (ML); Guideline Level (GL); Code of Practice (CoP); relevant Codex commodity standards are not included.

c - The year the standard was initially established, and, if applicable, most recently reviewed by CCCF. A 'review' involves a full assessment of available data and information, which may or may not result in the standard being changed; a review would not include several standards being consolidated or when a standard is discussed, moved (e.g. from a commodity standard into the GSCFF), its description is edited for clarity, etc.

List B: Codex Contaminant Standards Recommended for Re-Evaluation

Contaminant	Food	Type of Standard ^a	Year Established ^b	Year of Recommended Re-Evaluation ^c	Rationale for Re-Evaluation
Lead	Milk	ML	2001 (reviewed in 2013)	Not specified	“The Committee agreed to retain the current MLs of 0.02 mg/kg (milks) and 0.2 mg/kg (cereals). The Committee noted that the ML for milk might be reviewed in future when new data became available and might be revised in light of the review of the MLs for milk products. The Committee also noted that if different MLs would be considered for cereal grains in future, stricter MLs could be applied to certain cereal grains in light of available data.” (REP13/CF, para. 28-29)
	Cereal grains	ML	2001 (reviewed in 2013)	Not specified	
	Table olives	ML	2016	Not specified	“The Committee agreed to lower the ML from 1 mg/kg to 0.4 mg/kg; to re-evaluate table olives in future when more data became available, and to revoke the previous ML.” (REP16/CF, para. 77)
	Jams, jellies, marmalades	ML	2017	Not specified	“The Committee thus agreed to lower the ML to 0.4 mg/kg and to re-evaluate jams, jellies and marmalades in [the] future when more data became available.” (REP17/CF, para. 61)
Acetylated Deoxynivalenol Derivatives	Cereals & cereal-based products	ML	2015	Not specified	“The Committee...agreed that it was premature to continue with work on the extension of the MLs for DON in cereals and cereal products to its acetylated derivatives. The Committee encouraged members to continue collecting and submitting data on occurrence of acetylated DON to GEMS/Food and noted the need for development of an internationally validated method for analysis of acetylated DON. The Committee agreed that...when further information became available, it could be considered as part of the discussion on the MLs for DON in cereals and cereal-based products.” (REP 14/CF, para. 61-62)
Fumonisin	Maize flour & maize meal	ML	2014	2017	<p>“...the Committee agreed that the ML of 4 000 µg/kg for raw cereal grains and 2 000 µg/kg for maize flour and maize meal were ready for adoption by the Commission. In relation to the ML for maize flour and maize meal, the Committee agreed that these would be advanced for adoption with the understanding that exposure and impact assessment should be undertaken by JECFA within three years for reconsideration of the levels.” (REP14/CF, para. 71)</p> <p>“The Committee [JECFA] reviewed the studies that have become available since the previous evaluation in 2011, and concluded that they would not change the overall toxicological assessment performed previously by the Committee. Thus, the previously established group PMTDI of 2 µg/kg bw for FB1, FB2 and FB3, alone or in combination, was retained by the current Committee. The Committee noted that the international exposure estimates for FB1 and total fumonisins were lower than those estimated by the Committee at its seventy-fourth meeting in 2011. In the current assessment, a larger part of the occurrence data was from countries belonging to the WHO European Region compared with 2011, resulting in lower overall fumonisin levels in maize.</p>

Contaminant	Food	Type of Standard ^a	Year Established ^b	Year of Recommended Re-Evaluation ^c	Rationale for Re-Evaluation
					In the current assessment, no information on fumonisin levels in maize was available from countries belonging to the African, Eastern Mediterranean or South-East Asia regions, where higher fumonisin concentrations are typically detected." (JECFA/83/SC) "The Committee agreed to...call upon countries belonging to the African, Eastern Mediterranean or South-East Asia regions to provide to GEMS/Food contaminants database information on fumonisin levels in maize and to record this in the report of the meeting." (REP17/CF para. 151)
Inorganic Arsenic	Husked rice	ML	2016	2020	"The Committee agreed to advance the ML of 0.35 mg/kg for husked rice for adoption by CAC39 on the understanding that the ML would be reviewed three years after the implementation of the <i>Code of Practice for prevention and reduction of arsenic in rice</i> [CXC 77-2017], and would take into account all available data to clearly lower the ML of 0.35 mg/kg." (REP16/CF, para. 44)
Methylmercury	Tuna	ML	2018	2021	"The Commission adopted the proposed MLs [for methylmercury in tuna, alfonsino, marlin and shark], noting the reservations expressed by Cuba, Colombia, Ecuador, EU, Norway, Senegal and Switzerland, and agreed that CCCF could consider revising the ML for tuna in the light of additional data after three years." (REP18/CAC, para. 39)
Arsenic	Rice	CoP: CXC 77- 2017	2017	2019	"A delegation stated that they did not have any objections to the adoption of the COP. However, as the results of several ongoing studies would be available in 2019, the additional information gained from these studies might need to be added to this COP in order to make it more understandable and more practical. Thus, the delegation noted that there would be a need to revise the COP in 2019 when the outcome from ongoing studies became available."(REP17/CF, para. 102)

a - ML: Maximum Level; GL: Guideline Level; CoP: Code of Practice

b - The year the standard was initially established, and, if applicable, most recently reviewed by CCCF. A 'review' involves a full assessment of available data and information, which may or may not result in the standard being changed; a review would not include several standards being consolidated or when a standard is discussed, moved (e.g. from a commodity standard into the GSCTFF), or its description is edited for clarity, etc.

c - May represent the year that the item is brought forward for new work to CCCF and not necessarily the year the re-evaluation should be initiated.

ANNEX II
PRIORITIZATION OF CRITERIA FOR IDENTIFYING CODEX STANDARDS FOR REVIEW

For information

(To support comments on prioritization of Codex standards and related texts for contaminants for possible review as presented in Annex I)

Criteria ¹ for identifying Codex standards for review	Likelihood of indicating a potential safety concern ^b	Overall proposed prioritization for review by CCCF 1 – highest priority 2 – medium priority 3 – lowest priority
Criteria for Maximum levels, Guideline Levels and Codes of Practice		
Established or Reviewed ≥15 and <25 years ago ^c	Low to moderate	2
Established or Reviewed ≥25 years ago ^c	Moderate to high	1
Recommended for re-evaluation by CCCF, CAC or a member country within a certain period of time or at an unspecified future date.	Low to Moderate	2
New occurrence data are available: Occurrence data identified by CCCF or its member countries and/or submitted to the GEMS/Food database are significantly different ^d across two or more regions or markets than those used to establish the existing ML or GL.	Moderate to high	1
New dietary exposure data are available: CCCF, JECFA, or other relevant joint FAO/WHO expert consultations recognized by CCCF developed new dietary exposure estimates or revised existing estimates that are significantly different ^d than the previous estimates that were used to establish the existing ML or GL.	Moderate to high	1
A new health-based guidance value (HBGV) is available: Either JECFA, upon request by CCCF, or other relevant joint FAO/WHO expert consultations recognized by CCCF developed a new HBGV, revised an existing HBGV that is significantly different ^d than the previous HBGV that was used to establish the existing ML or GL, or withdrew an existing HBGV.	Moderate to high	1
A new or updated health risk assessment is available from JECFA or other relevant joint FAO/WHO expert consultations recognized by CCCF and the conclusions are significantly different ^b than the previous evaluation.	Moderate to high	1
Additional Criteria for Maximum Levels		
Codex commodity standards: Significant ^d revisions have been made to the commodity standards for relevant foods or food groups for which MLs are established.	n/a	3
Codex Classification of Food and Feed (CXM 4-1989): Significant ^d revisions have been made to this document for relevant foods or food groups for which MLs are established.	n/a	3
Trade disruptions: An existing ML for a certain food and contaminant combination is responsible for disruptions in international trade.	n/a	2 1 – when involving a trade disruption of a staple food
Additional Criteria for Codes of Practice		
Technological advances and developments: Significant ^d new information is available on contamination sources or processes, and/or agricultural, production and manufacturing practices related to food or feed contaminant management and control.	n/a	2

Criteria ¹ for identifying Codex standards for review	Likelihood of indicating a potential safety concern ^b	Overall proposed prioritization for review by CCCF 1 – highest priority 2 – medium priority 3 – lowest priority
Expanded scope: CoP could include other contaminants or toxins, or food or feed, with comparable contamination sources or processes, and/or agricultural, production and manufacturing practices.	n/a	3
Comparable CoP updated: Updates to a CoP for a similar food or feed and contaminant combination may be transferable to another CoP or make an existing CoP redundant.	n/a	3

n/a – not applicable

a - Certain criteria may overlap, particularly those relating to the various elements of a health risk assessment.

b - Potential safety concern would be determined once any new data and scientific information are assessed.

c - The year the standard was initially established, and, if applicable, most recently reviewed by CCCF. A 'review' involves a full assessment of available data and information, which may or may not result in the standard being changed; a review would not include several standards being consolidated or when a standard is discussed, moved (e.g. from a commodity standard into the GSCTFF), or its description is edited for clarity, etc.

d - The significance would be determined on a case-by-case basis by CCCF.