

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 19

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS 18th Session

Bangkok, Thailand
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REPORT OF THE PRE-SESSION WORKING GROUP ON THE REVIEW OF CODEX STANDARDS FOR CONTAMINANTS

(Prepared by the Chair of the WG on the Review of Codex Standards for Contaminants, Canada)

BACKGROUND

1. In 2024, the 3-year trial period (2022-24) for evaluating the proposed approach to prioritizing existing Codex standards for review, which was agreed to by CCCF14 (2021)¹ and improved upon during the 3-year period,^{2, 3} came to an end.
2. CCCF17 (2024) agreed to maintain the prioritization of existing Codex contaminant standards for review as an annual CCCF agenda item and to solicit information annually via a circular letter (CL) prior to presenting recommendations to plenary. It also committed reconvening the working group, chaired by Canada, as needed. It also agreed to request input via the CL on the request from CCMAS to review the sampling plans in the *General Standard for Contaminants and Toxins in Food and Feed* (CXS 193-1995) to determine if they are within the revised *General Guidelines on Sampling* (CXG 50-2004) and if this work would best fit under this or another agenda item.⁴
3. This document summarizes comments received in response to CL 2025/08-CF and the discussions of the virtual working group (VWG) which met prior to CCCF18.

COMMENTS IN RESPONSE TO CIRCULAR LETTER (CL 2025/08-CF)

4. The circular letter (CL) issued in advance of CCCF18 (2025) requested recommendations regarding additional standards from Lists A and B for inclusion in the OHPL; standards already in the OHPL that could be considered overall highest priority for review; volunteers to lead or co-lead items in the OHPL; and input on whether this agenda item is the best place to capture the request from CCMAS42 to evaluate sampling plans in CXS 193-1995 to ensure alignment with the revised CXG 50-2004.
5. Nine (9) member countries provided comments in reply to CL 2025/08-CF: Canada, Chile, Egypt, Ghana, Japan, Kenya, Senegal, Singapore, and the United States of America. These comments are available on the CCCF18 website.⁵ Key comments are summarized below along with the chair's proposals of how to address these comments, when required.
6. Unclear or incomplete information was provided by some member countries when standards from List A and B were nominated to the OHPL and standards within the OHPL were nominated as highest priority for review. Note that:
 - a. The working group (WG) chair was unable to record any nominations or other relevant information in the OHPL if a specific standard (i.e. contaminant, food and type of standard (ML or CoP)) from one of the tracking lists was not cited.
 - b. Only some member countries specifically cited the established prioritization criteria⁶. Some also did not provide any rationale, or clear rationale, for their nominations, as per the instructions in the CL. When possible, the chair aligned the members' comments with the agreed-upon prioritization criteria for entry in the OHPL and included other comments that would aid in prioritization in the 'Other Comments or Information' column of the OHPL. These proposals are outlined in the following paragraphs.

¹ CX/CF 21/14/16; REP21/CF

² REP22/CF15

³ REP23/CF16

⁴ REP24/CF17

⁵ CX/CF 25/18/20

⁶ Prioritization criteria are provided in Annex IV of CL 2025/08-CF

- c. When no rationale or unclear rationale was provided for a nomination, member countries were not registered in the 'Recommended to List or Prioritized By' column of the OHPL.
7. The following standards from Lists A and B were nominated for inclusion in the OHPL (nominating member country(ies) in brackets) based on the following prioritization criteria which were proposed to be added to the OHPL:
 - a. Cadmium, ML – cereal grains (Kenya)
 - i. List A.2 (priority 2)
 - ii. Staple food (priority 1)
 - iii. Relevant to developing countries (priority 1)
 - b. Aflatoxins, total, MLs (x8) – i) maize destined for further processing (FFP); ii) maize flour, meal, semolina, flakes; iii) husked rice; iv) polished rice; v) sorghum FFP; vi) cereal-based foods for infants and young children (general) and vii) food aid-specific; viii) chili pepper & nutmeg (dried) (Kenya, Ghana (prioritized ML for maize only))
 - i. List B (priority 1)
 - ii. Staple food (priority 1)
 - iii. Relevant to developing countries (priority 1)
 - c. Ochratoxin A, CoP (CXC 69-2009) – coffee (Kenya)
 - i. List A.2 (priority 2)
 - ii. Relevant to developing countries (priority 1)
 - d. Polyaromatic hydrocarbons, CoP (CXC 68-2009) – Foods made from smoking and direct drying (Senegal, Kenya)
 - i. List A.2 (priority 2)
 - ii. Staple food (priority 1)
 - iii. Relevant to developing countries (priority 1)
 8. One (1) member nominated the inorganic arsenic ML in polished rice to the OHPL as it could be reviewed simultaneously with the ML for inorganic arsenic in husked rice. As the OHPL is intended to be populated using standards List A and B,⁷ and this ML is in neither list, it isn't a candidate for inclusion in the OHPL. The following comment is instead suggested to be added to the inorganic arsenic in husked rice ML entry in the OHPL: "Consider concurrent review of ML for inorganic arsenic in polished rice."
 9. Several members suggested standards already in the OHPL that they considered high(est) priority for review (nominating member country(ies) in brackets), based on the following prioritization criteria which were proposed to be added to the OHPL:
 - a. Aflatoxin B1, CoP – feedingstuffs for milk-producing animals (CXC 45-1997) (Kenya)
 - i. Technological advances and developments (priority 2)
 - b. Aflatoxins, ML – peanuts FFP
 - i. Staple food (priority 1) (Senegal)
 - ii. Relevant to developing countries (priority 1) (Ghana, Kenya, Senegal)
 - c. Cadmium, MLs (x3) – pulses, wheat, polished rice (Kenya)
 - i. Staple food (priority 1)
 - ii. Relevant to developing countries (priority 1)
 10. The following notes were added to the 'Other Comments or Information' column of the OHPL:
 - a. Arsenic, ML – edible fats and oils: (Canada)
 - i. "Review ML when CCFO refers question to CCCF as to whether the ML applies to new types of oils (e.g. microbial oils)"

⁷ CL 2025/08-CF, Annex II, "Note 2" at top of OHPL: "This list is populated based on recommendations from the pertinent CCCF working group, using standards from Lists A and B of Annex I."

- b. Arsenic, CoP – rice (CXC 77-2017): (Japan)
 - i. “Prioritize CoP when ML and CoP are both up for re-evaluation”
 - c. Tin, total, MLs (x5) – processed meats in containers other than tinplate (Kenya)
 - i. “New food contact materials such as plastics, glass, and composite packaging require updated risk assessments for tin migration and consumer exposure”
11. Five (5) members commented that this agenda item is best-placed to track the review of sampling plans to ensure alignment with the updated revised *General Guidelines on Sampling* (CXG 50-2004). Reviewing the sampling plans at the same time the associated ML is being updated was also recommended. As such, the following comment was proposed to be added to relevant ML entries in the OHPL’s ‘Other Comments or Information’ column: “Initiate concurrent review of sampling plan.” A tracking table was also proposed to be added as an annex to the annual CL for this agenda item. This tracking table will include all seven (7) sampling plans, including those that do not have an associated ML in the OHPL.
12. One (1) member country also shared the following editorial comments regarding List A.2, which were standards unintentionally omitted from this list which are now proposed for inclusion as they meet its criterion of being established or reviewed ≥ 15 and < 25 years ago (i.e. between 2000 and 2009):
- a. Aflatoxins, peanuts – CoP (CXC 55-2004)
 - b. 3-Monochloropropane-1,2-diol (3-MCPD), Acid-HVPs and Products that Contain Acid-HVPs – CoP (CXC 64-2008)
 - c. Ochratoxin A, wine – CoP (CXC 63-2007)
13. Volunteers to lead or co-lead items
- a. Inorganic arsenic, husked rice – ML:
 - i. Add to ‘Member Country Volunteer’ column of the OHPL: “Singapore (co-chair following JECFA evaluation)”
 - b. Source directed measures to reduce contamination of food (CXC 49-2001) – CoP
 - i. The United States of America (USA) indicated that it continues to support this work but cannot volunteer to chair it for 2026. They will continue to be registered in the OHPL as the member country volunteer and a reference to this most recent support will be recorded in that list.
14. Items were raised by two (2) different member countries that are somewhat outside of the scope of this agenda item; the chair proposes that both could be raised at CCCF18 under Agenda item 22, ‘Other business’:
- a. If the five (5) biotoxin MLs from the commodity standard (*Standard for Live and Raw Bivalve Molluscs* (CXS 292-2008)) should be moved to the *General Standard for Contaminants and Toxins in Food and Feed* (CXS 193-1995) (GSCTFF).
 - b. The entries for aflatoxins in tree nuts in the tracking lists for this agenda item use the wording “intended for further processing” when the correct wording is “destined for further processing.” The chair notes that the wording in the tracking lists reflect that used in the GSCTFF and also notes that “intended” FFP is used in GSCTFF in the aflatoxin ML listings for tree nuts and peanuts, as well as in the title of the aflatoxins in peanuts sampling plan.

CONFERENCE ROOM DOCUMENTS

15. Following the deadline for CL comments, no comments were received via conference room documents (CRDs) posted to the CCCF18 website (as of 18 June 2025).

DISCUSSION OF THE VIRTUAL PRE-SESSION WORKING GROUP

16. The VWG met on-line the week before CCCF18, on 16 June 2025. It was jointly chaired by Rosalie Awad (Canada) and Elizabeth Elliott (Canada), who also jointly served as rapporteurs. The key objectives of the VWG were to discuss and seek agreement on the following:
- a. Nominations of standards from Lists A and B to include in the OHPL
 - b. Additional prioritization criteria, rationale and other information to include in certain entries in the OHPL
 - c. Volunteers to lead or co-lead items in the OHPL

- d. How to track sampling plan re-evaluation to ensure alignment with the revised *General Guidelines on Sampling* (CXG 50-2004)
 - e. Recommendations to bring to CCCF18 for consideration
17. The VWG discussed the key changes proposed to the OHPL (paragraphs 7-10 and 13, above) during the slide show presentation and also viewed them directly using the 'track changes' function, along with the table proposed as a new annex to track sampling plans for review (paragraph 11, above).
 18. The editorial changes to List A.2 (paragraph 12, above) were not discussed during the slide show presentation but were viewed in List A.2 in 'track changes'; the VWG did not raise any concerns about these editorial updates to List A.2.
 19. All of the proposals outlined in paragraphs 7 to 12, above, were agreed to by the VWG with the exception of the nomination of the ML for aflatoxins in dried chili pepper and nutmeg to the OHPL (paragraph 7(b), above), based on the following rationale:
 - a. One (1) member questioned if rationale specific to the ML for spices was provided, as the information provided seemed to relate more to the MLs for aflatoxins in cereal grains which were also nominated by the same member country. They also noted the ML for aflatoxins in these two dried spices was just adopted in 2023.
 - b. Another member country supported the above intervention.
 - c. The WG chair confirmed that it was difficult to determine if rationale that explicitly aided in the prioritization of the spices ML was provided and suggested not including this ML in the OHPL; the VWG did not raise any concerns regarding this proposal.
 - d. The nominating member country did not share its views during the VWG meeting. The WG chair indicated that the nomination could be resubmitted next year via CL and reminded participants that all nominations must be supported by prioritization criteria or other clear rationale in order to be recorded in the OHPL.
 20. Volunteers for member countries to chair or co-chair agenda items were called for during the VWG. Based on these discussions, information in quotations, below, was agreed to be added to the 'Member Country Volunteer' column of the OHPL. The first item includes a minor update to the information in paragraph 13(a), above, and the other items reflect new information brought forward during the VWG:
 - a. Inorganic arsenic, husked rice – ML:
 - i. "Singapore (co-chair following JECFA 2025 evaluation and CCCF review of CoP for arsenic in rice)"
 - b. Arsenic in Rice – CoP:
 - i. "Japan (chair), Singapore (co-chair) following JECFA 2025 evaluation"
 - c. Ochratoxin A in Coffee – CoP (CXC 69-2009)
 - i. "Brazil (chair at a future date)"
 - d. Methylmercury in tuna – ML and concurrent review of sampling plan
 - i. New Zealand is willing to chair this work, starting with a possible discussion paper prepared for CCCF19, if there is capacity for additional work on the CCCF19 agenda
 - ii. New Zealand agreed that coupling the sampling plan review (paragraph 11, above) with the ML review seemed reasonable and agreed to take on that work when the ML review was initiated.
 - iii. The Codex Secretariat indicated that the capacity for this work can be discussed towards the end of CCCF18 plenary once there is a clearer idea of the forward agenda for CCCF19
 21. In regards to paragraph 14 a), above, the Codex Secretariat shared that the biotoxin MLs could be transferred from the commodity standard into the GSCTFF and that some investigation may first be needed to determine why the MLs were housed in the commodity standard initially. Further discussion at plenary may ensue within or outside this agenda item and at the discretion of the member country who raised the comment or the Codex Secretariat.
 22. The VWG did not have time to discuss the item raised in paragraph 14(b), above, or the WG chair's suggestion that the matter could be raised at CCCF18 under Agenda item 22, 'Other business'.

RECOMMENDATIONS

23. The VWG agreed to recommend the following to CCCF18:
- a. Add the following standards from Lists A and B to the OHPL, along with the agreed-upon prioritization criteria:
 - i. Cadmium, cereal grains – ML
 - ii. Aflatoxins, various cereals & cereal-based foods – MLs (x7) (see paragraph 7(b), above).
 - iii. Ochratoxin A in coffee – CoP (CXC 69-2009)
 - iv. PAHs in smoked and dried foods – CoP (CXC 68-2009)
 - b. Add additional prioritization criteria, rationale and other information to certain entries in the OHPL and make editorial changes to List A.2
 - c. Track sampling plan re-evaluation for alignment with the with *General Guidelines on Sampling* (CXG 50-2004) in the OHPL, when relevant, and in a new annex that will be circulated as part of the annual CL
 - d. Issue annual CL in advance of CCCF19
 - e. Discuss the possibility for new work next year to review the methylmercury ML in tuna and associated sampling plan (chaired by New Zealand), pending capacity in the forward CCCF19 agenda
24. Although the VWG did not discuss whether or not to hold a VWG in advance of CCCF19, the WG chair suggests that a VWG be held again next year based on the useful discussions this year and that it gives member countries an opportunity to consider and discuss their capacity to volunteer to take on new work to chair or co-chair existing Codex standards that have been prioritized for review.