

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 Items 4.1, 4.2, 4.3, 4.4, 4.5

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx ALIMENTARIUS COMMISSION

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COMMENTS OF EGYPT

AGENDA ITEM 4.1

CX/CAC 25/48/3; CX/CAC 25/48/3 Add.1

Egypt appreciates the work which done in the documents and agrees to adoption of the documents presented by CCFV.

AGENDA ITEM 4.2

CX/CAC 25/48/4; CX/CAC 25/48/4 Add.1

Egypt appreciates the work which done in the documents and agrees adoption of all the provisions presented by CCFA at step 8, 5/8

AGENDA ITEM 4.3

CX/CAC 25/48/5; CX/CAC 25/48/5 Add.1

Egypt supports the adoption of the proposed methods of analysis, performance criteria, and sampling plan for provisions in Codex standards.

AGENDA ITEM 4.4

CX/CAC 25/48/6; CX/CAC 25/48/6 Add.1

Egypt appreciates the work which done in the documents and in this regard, Given that 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 request the following:

Dried Bark: Egypt recommends that the maximum level (ML) for lead in this type of spices be reduced to 2.0 mg/kg.

Dried Culinary Herbs: Egypt request that the maximum level (ML) for lead in these products be 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 increased daily exposure to lead, posing a significant health risk, especially with lead accumulation in the body and its negative effects on the nervous system and mental development of children.
3. The World Health Organization (WHO) and international bodies confirm that there is no completely safe level of lead exposure, and that any reduction in exposure has a positive impact on public health.

AGENDA ITEM 4.5

CX/CAC 25/48/7 Rev.1; CX/CAC 25/48/7 Add.1

Egypt appreciates the work which done in the documents and in this regard, Egypt maintains its reservation on the proposed MRLs for Fipronil (202) (wheat) and Propiconazole (160) (rice), due to the following reasons:

1- For Fipronil (202) in Wheat

- Fipronil is a broad-spectrum insecticide characterized by its persistence and potential accumulation in the environment and food chains.
- Recent scientific evaluations , including those from the European Food Safety Authority (EFSA) , have indicated possible chronic dietary exposure concerns, particularly for cereals and cereal-based products, due to the stability of Fipronil residues during processing and storage .

- Given that wheat and its products represent a major component of the Egyptian diet , even low residue levels could result in higher cumulative exposure among consumers.

Therefore, Egypt recommends further toxicological and residue studies , especially on processing factors and long-term dietary exposure , before advancing or adopting new CXLs for Fipronil in wheat.

2- For Propiconazole (160) in rice:

- Propiconazole undergoes extensive metabolic transformation in plants and may produce several metabolites whose toxicity profiles are not fully characterized .
- Available toxicological data appear insufficient to conclusively assess the potential genotoxicity and chronic dietary risk of these metabolites, as highlighted in other international assessments.
- Since rice and rice-based products are a dietary staple in Egypt, even limited uncertainties regarding the long-term exposure to residues or metabolites could have significant implications for public health.

Therefore, Egypt recommends that the proposed MRL for Propiconazole in rice be reconsidered and lowered, taking into account the current uncertainties regarding the identity, levels, and toxicity of major metabolites in cereals. Egypt further recommends conducting additional toxicological and residue studies to ensure that the established MRL adequately protects consumers from potential long-term dietary exposure