

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda item 20

CX/CF 25/18/20

May 2025

ORIGINAL LANGUAGE ONLY

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON CONTAMINANTS IN FOODS**

**Eighteenth Session**

**23-27 June 2025**

**Bangkok, Thailand**

**REVIEW OF CODEX STANDARDS FOR CONTAMINANTS  
(Comments in reply to CL 2025/08–CF)**

*submitted by*

*Canada, Chile, Egypt, Ghana, Japan, Kenya, Senegal, Singapore  
and the United States of America (USA)*

**Background**

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2025/08–CF<sup>1</sup> issued in February 2025. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

**Explanatory notes on the appendix**

2. The comments submitted through the OCS are hereby annexed and presented in a tabulated format.

---

<sup>1</sup> <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>  
<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCCF>

## ANNEX

## GENERAL COMMENTS

COMMENT	MEMBER/OBSERVER
<p>I. Canada doesn't recommend additional standards to include in the OHPL. There are numerous standards in the OHPL that could be considered for review before more standards are added to it.</p> <p>II. Canada recommends that the ML for arsenic in edible fats and oils be reviewed once the JECFA evaluation of arsenic is complete (scheduled for October 2025). It's expected that CCFO will be referring a question to CCCF19 (or possibly CCCF18) as to whether the existing ML for arsenic in edible fats and oils would apply to microbial oils. The standard for arsenic in edible fats and oils meets several prioritization criteria, including that it's in List A.1. (established &lt;1980). Therefore, the ML is not only outdated but also appears to have been transferred from the commodity standards and may not have been established using risk-based, scientific rationale.</p> <p>III. Canada is already chairing the EWG on the review of the CoP on aflatoxins in feed (Agenda item 12), and this Agenda item (#19) on the review of Codex standards. Therefore, Canada will not be volunteering to lead any additional work at this time.</p> <p>IV. The prioritization criteria established to prioritize existing Codex contaminant standards for review do not apply to the review of contaminant sampling plans in the GSCTFF. Therefore, the framework established for this agenda item (#19) is not required for that work.</p> <p>Tracking the review of sampling plans could be done in a distinct agenda item specific to that work.</p>	Canada
<p>Chile está de acuerdo en que el tema 19 del programa "Trabajo Futuro; Revisión de las normas del Codex sobre Contaminantes" es el lugar más adecuado para recoger la solicitud formulada por el CCMAS42, de evaluar los planes de muestreo de la Norma general para los contaminantes y las toxinas presentes en los alimentos y piensos (CXS 193-1995) para garantizar la consonancia con las Directrices sobre muestreo (CXG 50-2004) revisadas.</p>	Chile
<p>Seven sampling plans are under consideration, as stated in paragraph 7 of the Circulated Letter (CL 2025/08-CF).</p> <p>CCMAS has endorsed all seven sampling plans, so there is no pressing need to align them with CXG 50-2004 at this time.</p> <p>Given that these sampling plans are closely linked to the values of the relevant maximum levels, it would be most reasonable to review the sampling plans in conjunction with the review of the relevant maximum levels.</p> <p>Accordingly, Japan proposes to explicitly state in the lists in Annexes I and II that the review of the sampling plans is included.</p>	Japan
<p><u>Comment:</u> Kenya supports the continued review of standards developed or last revised more than 15 years ago, particularly those related to staple foods and economically important commodities in the region. Kenya, take note of the recent updates to Lists A and B and the Overall Highest Priority List (OHPL) and strongly support the inclusion of updated aflatoxin-related standards, which are of particular relevance to Africa due to climatic and storage conditions that increase the risk of contamination.</p> <p>Kenya recommends the inclusion of the following contaminants in the final OHPL, prioritized as follows:</p> <ol style="list-style-type: none"> <li>1. Re-evaluation of Aflatoxins (Total) in: <ul style="list-style-type: none"> <li>o Maize grain (destined for further processing), maize flour/meal/semolina/flakes</li> <li>o Husked and polished rice</li> <li>o Sorghum grain (for further processing)</li> <li>o Cereal-based foods for infants and young children (both general and food aid-specific)</li> <li>o Chili pepper, dried nutmeg</li> </ul> </li> </ol>	Kenya

COMMENT	MEMBER/OBSERVER
<p><u>Rationale:</u> Maize, rice, sorghum, and cereal-based foods are staple foods in Kenya and widely consumed across the region. Aflatoxin contamination presents a serious public health risk, particularly for infants and young children due to their increased vulnerability. Kenya notes the conclusions of CAC45 and supports further Re-evaluation following recent calls for data.</p> <p>2. Re-evaluation of cadmium in polished rice, wheat, pulses, and cereal grains.</p> <p><u>Rationale:</u> These foods constitute a major portion of the Kenyan diet. Cadmium levels should be reassessed in light of changing agricultural practices, soil quality, and updated dietary exposure data. Existing MLs for cadmium in rice date back over 25 years and may not reflect current risks.</p> <p>3. Re-evaluation of Code of Practice (CoP) for Raw Materials and Supplemental Feeding Stuffs for Milk-Producing Animals (CXC 45-1997).</p> <p><u>Rationale:</u> The current CoP is outdated and does not adequately address emerging risks, new ingredients, or modern feed safety management practices. A revision is essential to ensure food safety at the farm level.</p> <p>4. Re-evaluation of CoP for Tin, Total – MLs in Containers Other Than Tinplate (CXC 60-2005).</p> <p><u>Rationale:</u> MLs for tin in non-tinplate containers were last revised in 1981. New food contact materials such as plastics, glass, and composite packaging require updated risk assessments for tin migration and consumer exposure.</p> <p>5. Re-evaluation of CoP for the Prevention and Reduction of Ochratoxin A (OTA) Contamination in Coffee (CXC 69-2009).</p> <p><u>Rationale:</u> Coffee is a major export crop in Kenya and the wider region. Post-harvest handling, storage, and transportation advances offer new opportunities to reduce OTA contamination. An updated CoP would ensure the incorporation of best practices based on the latest science.</p> <p>6. Re-evaluation of CoP for the Reduction of PAH Contamination from Smoking and Direct Drying Processes (CXC 68-2009).</p> <p><u>Rationale:</u> Traditional smoking and drying techniques remain prevalent in Kenya. While culturally important, these practices may contribute to PAH contamination. Revised guidance would help reduce PAH levels while respecting traditional food preparation methods. Kenya also supports the retention of the ML for aflatoxins in peanuts intended for further processing in the OHPL due to its ongoing public health significance and relevance to intra-regional trade.</p> <p>At this time, Kenya is not in a position to lead or co-lead any item on the OHPL. Still, it reaffirms its commitment to active participation in future discussions and working group efforts. Kenya remains open to collaboration with other Codex members and observers to advance shared priorities. Kenya extends its appreciation to the CCCF Secretariat and all members for their dedication to evidence-based standard-setting, which is vital for ensuring global food safety and consumer protection.</p>	
<p>Le Sénégal propose de considérer comme prioritaires:</p> <ul style="list-style-type: none"> <li>• La limite maximale (LM) pour les aflatoxines dans les arachides destinées à une transformation ultérieure (Liste A.2).</li> <li>• Le code d'usages pour la réduction de la contamination des aliments par les Hydrocarbures Aromatiques Polycycliques (HAP) issus des processus de fumage et de séchage direct (CXC 68-2009).</li> </ul> <p>Les arachides, ainsi que le poisson fumé et séché, sont largement consommés au Sénégal. Ils font partie des aliments de base du quotidien.</p>	Senegal
<p>Review of sampling plans</p> <p>Based on the available standing agenda items, Singapore considers the current agenda item on the “review of Codex standards for contaminants” to be the most appropriate to evaluate sampling plans for GSCTFF (CXS 193-1995).</p>	Singapore

COMMENT	MEMBER/OBSERVER
<p>The United States appreciates the opportunity to comment on CL 2025/08-CF.</p> <p>Codex members and observers are invited to:</p> <p>i. <i>Recommend additional standards from Lists A and B (Annex I) for inclusion in the OHPL (Annex II) based on the prioritization criteria (Annex IV) or other clear, reasonable rationale that aids in prioritization.</i></p> <p>U.S. Response:</p> <p>a. Arsenic in husked rice is currently on the OHPL. The United States recommends that arsenic in polished rice be added to the OHPL for simultaneous review with husked rice, but this work should await completion of the upcoming JECFA evaluation.</p> <p>b. CCCF can consider whether the marine biotoxin MLs in commodity standards should be moved to the GSCTFF.</p> <p>ii. <i>Recommend standards already in the OHPL (Annex II) that could be considered the overall highest priority for review based on the prioritization criteria (Annex IV) or other clear, reasonable rationale that aids in prioritization.</i></p> <p>U.S. Response:</p> <p>a. Regarding the revision of CXC 49-2001 (source-directed measures) in the OHPL, the United States supports this work but cannot chair it for 2026, given its involvement in other WGs.</p> <p>iii. <i>Indicate whether your country is willing to lead or co-lead any items presently listed or newly recommended for inclusion in the OHPL in response to this circular letter (Annex II).</i></p> <p>U.S. Response:</p> <p>a. As noted above, the United States supports revising CXC 49-2001 (source-directed measures) but is unable to chair the work for 2026 given its involvement in other WGs.</p> <p>iv. <i>Provide input on whether this agenda item is the best place to capture the request from CCMA542 to evaluate sampling plans in the General Standard for Contaminants in Food and Feed (CXS 193-1995) to ensure alignment with the revised Guidelines on Sampling (CXG 50-2004), or if this work is better captured under another existing agenda item or a separate, new agenda item, and any other comments on how this work could proceed.</i></p> <p>U.S. Response:</p> <p>a. This agenda item is an appropriate place to capture the request to evaluate sampling plans. We suggest that the sampling plans be evaluated on a plan-by-plan basis as CCCF initiates review of MLs on the OHPL.</p>	<p><b>USA</b></p>

## SPECIFIC COMMENTS

COMMENT	MEMBER/OBSERVER
<b>ANNEX I List A: Codex Contaminant Standards Established or Reviewed ≥25 or ≥15 and &gt;25 Years Ago</b>	
<p>Egypt appreciates the work which done by JACFA and approvals to give urgent priority to reviewing the maximum limits for each of (aflatoxins in peanuts intended for processing - arsenic - cadmium - mercury in table salt), while giving medium priority to the standards of each of (Code of Practices for Reducing Acrylamide in Foods - Code of Practices for Reducing Pollution with Polycyclic Aromatic Hydrocarbons - Maximum Limits for M1 Aflatoxins in Milk - Standards for Heavy Metals in Grains and Vegetables).</p>	<b>Egypt</b>
<p>Position: Ghana supports the ongoing annual review process and the integration of strategic foresight, public health impact, and technical feasibility in selecting and updating standards.</p> <p>1. Recommendations for Standards to Be Added to the OHPL (Annex I → Annex II)</p> <p>Aflatoxins in Maize and Groundnuts (Already in List A.1) – Recommend for OHPL Inclusion</p> <ul style="list-style-type: none"> <li>• <u>Rationale</u>: Aflatoxin contamination in maize and groundnuts remains a critical food safety and trade issue in Ghana and across West Africa.</li> <li>• <u>Public Health Justification</u>: Aflatoxins are classified as Group 1 carcinogens by IARC and are linked to liver cancer and stunted growth in children.</li> <li>• <u>Recommendation</u>: Include MLs for aflatoxins in maize and groundnuts in the Overall Highest Priority List (OHPL) for re-evaluation based on recent data and the regional burden.</li> </ul> <p>2. Reinforce Priority of Standards Already in OHPL</p> <p><u>Position</u>: 4. Sampling Plans – Support Retaining Within Existing Agenda Item</p> <p>Ghana supports maintaining the review of sampling plans within the ongoing CCCF agenda item on the review of Codex standards for contaminants (currently Agenda Item 18), for the following reasons:</p> <ul style="list-style-type: none"> <li>• <u>Efficiency</u>: Integrating this review avoids duplicative processes and aligns sampling revisions with standard revisions.</li> <li>• <u>Coherence</u>: The review of MLs and associated sampling plans should proceed concurrently to ensure scientific and regulatory consistency.</li> <li>• <u>Ghana's Input</u>: Ghana recognizes the importance of aligning sampling provisions in CXS 193-1995 with CXG 50-2004 and recommends involving regional laboratories and technical working groups in assessing feasibility and implementation capacity, particularly in low-resource settings.</li> </ul>	<b>Ghana</b>
<p><u>Aflatoxins, total for Peanuts intended for further processing</u></p> <p>There is an error in the reference number of the Code of Practice.</p> <p>Japan proposes to review the sampling plan in conjunction with the review of the MLs.</p> <p><u>Aflatoxins, total for tree nuts</u></p> <p>Japan proposes to review the relevant sampling plans in conjunction with the review of the MLs.</p> <p>Regarding tree nuts, based on the adopted sampling plan and the annotations in the GSCTFF, we believe that "destined for further processing" is the correct term rather than "intended for further processing."</p>	<b>Japan</b>

COMMENT	MEMBER/OBSERVER
<p><u>Aflatoxins, total for Peanuts</u></p> <p>The Code of Practice is included in the OHPL and is already under review; however, Japan proposes keeping it on list A until the review is completed.</p> <p><u>Chloropropanols</u></p> <p>Japan suggests adding the CoP (CXC 64-2008) of the same age with the corresponding ML as it is missing.</p> <p><u>Ochratoxin A</u></p> <p>Japan suggests adding the CoP for wine (CXC 63-2007) as it is missing.</p>	
CCCCF can consider whether the marine biotoxin MLs in commodity standards should be moved to the GSCTFF.	USA

COMMENT	MEMBER/OBSERVER
<b>ANNEX I List B: Codex Contaminant Standards Recommended for Re-Evaluation</b>	
<p><u>Aflatoxins total for cereals</u></p> <p>Japan proposes to review the relevant sampling plans in conjunction with the review of the MLs.</p> <p><u>Fumonisin</u></p> <p>Japan proposes to review the relevant sampling plan in conjunction with the review of the MLs.</p> <p><u>Methylmercury</u></p> <p>Japan proposes to review the relevant sampling plan in conjunction with the review of the MLs.</p>	Japan
Arsenic in husked rice is currently on the OHPL. The United States recommends that arsenic in polished rice be added to the OHPL for simultaneous review with husked rice, but this work should await completion of the upcoming JECFA evaluation.	USA

COMMENT	MEMBER/OBSERVER
<b>ANNEX II Overall Highest Priority List (OHPL) for Re-Evaluation of Codex Standards and Related Texts for Contaminants in Food and Feed</b>	
<p><u><i>Aflatoxins total</i></u> Japan proposes to review the relevant sampling plan in conjunction with the review of the MLs.</p> <p><u><i>Arsenic, COP for rice</i></u> As a possible follow-up to the JECFA evaluation, priority should be given to updating the COP rather than reviewing the ML for husked rice for the following reasons:</p> <ul style="list-style-type: none"> <li>• In general, when both an ML and a COP are listed in the OHPL for a specific contaminant/food combination, priority for re-evaluation should be given to the COP. This is because implementing a COP is generally more effective in reducing food contamination. Thus, the most efficient approach to improving food safety within the current CCCF workload is to update the COP first and subsequently review the corresponding ML based on occurrence data collected after the COP has been implemented.</li> <li>• New information on arsenic prevention measures may become available. Therefore, it could be worth considering whether there might be sufficient evidence to justify updating the COP by issuing a Circular Letter.</li> </ul> <p><u><i>Arsenic, inorganic, ML for husked rice</i></u> As a possible follow-up to the JECFA evaluation, priority should be given to updating the COP rather than reviewing the ML for husked rice for the following reasons:</p> <ul style="list-style-type: none"> <li>• In general, when both an ML and a COP are listed in the OHPL for a specific contaminant/food combination, priority for re-evaluation should be given to the COP. This is because implementing a COP is generally more effective in reducing food contamination. Thus, the most efficient approach to improving food safety within the current CCCF workload is to update the COP first and subsequently review the corresponding ML based on occurrence data collected after the COP has been implemented.</li> <li>• New information on arsenic prevention measures may become available. Therefore, it could be worth considering whether there might be sufficient evidence to justify updating the COP by issuing a Circular Letter.</li> </ul> <p><u><i>Cadmium</i></u> The CoP(CXC 77-2017) is for arsenic, not cadmium, so it should be deleted from the corresponding standard.</p> <p><u><i>Methylmercury, ML for tuna</i></u> Japan proposes to review the relevant sampling plan in conjunction with the review of the MLs.</p>	Japan
<p>Singapore appreciates Canada's leadership in this important work. Singapore has no new standards to recommend for inclusion in the Overall Highest Priority List.</p> <p>Singapore would like to volunteer as a co-lead to review inorganic arsenic standards in husked rice after JECFA completes the arsenic evaluation.</p>	Singapore
<p>The United States supports the revision of CXC 49-2001 (source-directed measures) in the OHPL but cannot chair the work for 2026 given its involvement in other WGs.</p> <p>As noted above, the United States supports revising CXC 49-2001 (source-directed measures) but cannot chair the work for 2026 given its involvement in other WGs.</p>	USA