

# codex alimentarius commission

FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD HEALTH  
ORGANIZATION

JOINT OFFICE: Via delle Terme di Caracalla 00100 Rome Tel.: 39.06.57051 Telex: 625825-625853 FAO I E-mail Codex@fao.org Facsimile:39.06.5705.4593

**Agenda Item 16 D**

**CX/FAC 02/26 – Add. 1**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS

#### Thirty-fourth Session

Rotterdam, The Netherlands, 11-15 March 2002

### POSITION PAPER ON DIOXINS AND DIOXIN LIKE PCBs, INCLUDING METHODS OF ANALYSIS FOR DIOXINS AND DIOXIN LIKE PCBs

The following comments have been received from Brazil, Germany, Australia and EC

#### **BRAZIL**

**Information on Methods of Analysis for Dioxins and Dioxin Like PCBs** (para. 176). The Committee requested delegations to submit all available information on methods of analysis for dioxins and dioxin like PCBs in foods and feedingstuffs to the delegation of the Netherlands.

Brazilian Position: **No Comments**

#### **GERMANY**

Germany thanks the Netherlands for the review of the document. Germany asks for the following text to be added at the end of paragraph 43 under the bullet point "Tolerable intake":

Germany is of the opinion that in the medium term not only the 14pg WHO-TEQ/kg body weight per week proposed as the tolerable weekly human intake for dioxins by the Scientific Committee for Food (SCF) in its opinion of 30 May 2001 should be kept, but be further reduced to under 7 pg WHO-TEQ/kg body weight per week. The Federal Environmental Agency as the subordinate authority of the German Environment Ministry plans to hold a public hearing with the participation of SCF, WHO, EPA, and other experts in mid 2002 at which the different positions will be discussed.

## AUSTRALIA

In reference to CCX/ FAC 02/26, - Position Paper on Dioxins and Dioxin-Like PCBs, Including Methods of Analysis for Dioxins and Dioxin-like PCBs, Australia wishes to provide the following comments.

### BACKGROUND

At the 31st and 32nd Session of the CCFAC the Netherlands presented a Discussion Paper on Dioxins. The paper described the risk assessment of polychlorinated dibenzo-p-dioxins (PCDDs) and dibenzofurans (PCDFs) (further referred to as 'dioxins') and dioxin-like PCBs. It summarised results from recent activities gathering information on the occurrence of dioxins and dioxin-like PCBs in the general environment and the possible health risks of exposure to these substances through consumption of foods.

The 32nd Session of the CCFAC decided that this Discussion Paper should be used as a basis for the elaboration of an additional Position Paper on Dioxins and Dioxin-like PCBs. This Position Paper should include:

- potential range of levels in the food products of interest (including feed stuffs),
- information on available methods of analyses and
- exploration of the arguments for and against setting maximum limits

The 33rd Session of the CCFAC agreed that the delegation of the Netherlands would revise the Position Paper on dioxins and dioxin-like PCBs, for circulation, comments and consideration at the 34th CCFAC Session, taking into account the comments and data received, as well as the results of the JECFA evaluation on dioxins and dioxin-like PCBs in June 2001. The Committee also requested governments to submit all available information on methods of analysis for dioxins and dioxin like PCBs in foods and feedingstuffs to the delegation of the Netherlands (ALINORM 01/12A, paras. 176-177).

### COMMENT ON THE POSITION PAPER ON DIOXINS AND DIOXIN-LIKE PCBs

Australia recognises the public health and safety issues associated with persistent environmental pollutants, such as dioxins and dioxin-like PCBs, and the need to minimise exposure of the animal and human population to these contaminants. There is general agreement that the major sources of contamination are industrial activities, such as incinerating processes. Natural disasters, such as forest fires, may also be major source of emissions of dioxins and dioxin-like PCBs in Australia.

Australia agrees that the most effective risk management option, as previously discussed at CCFAC meetings, is the need for source directed measures such as control of incineration processes. There is ample evidence that such measures have been effective to decrease emissions of dioxins into the environment, with concomitant reduction of residues accumulating in the food chain. This has in turn resulted in decreased exposure in humans and animals to these residues via foods and animal feed. Reducing residue levels in food can only be achieved over the long-term through changes to industrial practices.

To best ensure that an appropriate level of protection is achieved for human health, CCFAC should consider obtaining additional information through a risk assessment on intake before any decision to reduce intake below the PTMI recommended by JECFA. Long-term goals would be best discussed after adequate information has been obtained on the current situation globally. Information on the impact of any goals on local production of food will need to be obtained and analysed. Obtaining the necessary information needed for implementation and/or evaluation of any future risk management measures is fundamental to best managing dioxins and dioxin-like PCBs in food.

Australia supports the results of the JECFA evaluation of dioxin and dioxin-like PCBs recommended to CCFAC in June 2001. The position paper developed by the Netherlands does not raise any issues which would effect the PTMI of 70 pg TEQ/kg bw/month recommended by JECFA.

Australia is not convinced by the argument presented by the Netherlands in the Position Paper that MLs in food (and feed) will stimulate and support all involved parties (feed- and food industry, environmental authorities, incinerators and other emission sources) to take steps or continue efforts towards a decrease of emissions. The major producers of dioxins such as incinerators, cement kilns and power stations have no link with food or animal feed production, and so it is unlikely that setting MLs for dioxins in feed and food will provide any incentive to industry or have any effect on sources of emissions.

Australia has reservations that the proposal to set MLs for dioxins and dioxin-like PCBs might not meet the criteria for setting a Codex ML for a contaminant<sup>1</sup>. Specifically, that MLs shall only be set for those foods where the contaminant may be found in amounts significant for total exposure, and (subject to toxicology) shall be set at levels that are slightly higher than the normal range of variation. At present, there is not enough global data to know what the normal range of variation is, and not enough to say for sure what foods are significant in terms of exposure. These state that MLs shall be set:

- a. Only for those contaminants that present both a significant risk to public health and a known or expected problem in international trade;
- b. Only for those foods that are significant for the total exposure of the consumer to the contaminant;
- c. As low as reasonably achievable. Providing it is acceptable from the toxicological point of view, MLs shall be set at a level which is (slightly) higher than the normal range of variation in levels in foods that are produced with current adequate technological methods, in order to avoid undue disruptions of food production and trade.

<sup>2</sup>Australia does not support the setting of maximum levels (MLs) of dioxins and dioxin-like PCBs for animal feed and foodstuffs on the basis that:

1. The proposal to set MLs for dioxins and dioxin-like PCBs might not meet the criteria for setting a Codex ML for a contaminant
2. There is currently a lack of sufficient data in many Codex member countries on which to base MLs for dioxins and dioxin-like PCBs;
3. Dioxins and dioxin-like PCBs are spread across a broad range of foods – controlling the levels in particular foods may be ineffective in significantly reducing dietary intake;
4. Setting of MLs for dioxins and dioxin-like PCBs will not achieve a significant reduction of intake of these contaminants without significant disruption in the food supply;
5. The required technical expertise to measure dioxins and dioxin-like PCBs is not available in all the Codex member countries,

Monitoring of maximum limits for dioxins is very expensive and the costs of enforcement would outweigh the benefits of setting the MLs;

## EUROPEAN COMMUNITY

### 3) Information on Methods of Analysis for Dioxins and Dioxin-like PCBs

The European Community is currently discussing a set of requirements to be applicable in the European Community and with which the used methods of analysis have to comply. These requirements are subdivided into two different parts: a set of requirements for methods of analysis used for screening purposes (cell-based bioassays and kit-based bioassays, as well as GC/MS, TMS, ...) and for confirmatory purposes (HRGC-HRMS). Once finalised, the European Community will submit this set of requirements to the Netherlands.

---

<sup>1</sup> Preamble to the Codex General Standard for Contaminants and Toxins in Foods – Codex Standard 1923-1995 (rev. 1 – 1997).