CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

E

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda item 3.1

CX/EXEC 25/89/3
September 2025

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

EXECUTIVE COMMITTEE OF THE CODEX ALIMENTARIUS COMMISSION

Eighty-ninth Session

FAO headquarters, Rome, Italy

3–7 November 2025

CRITICAL REVIEW - PART I[1]

Procedural background for the critical review

1. In line with Section 2.1 *Procedures for the elaboration of Codex standards and related texts* of the *Codex Procedural Manual*[2], paragraphs 2 and 3, and Part 2 Critical review (paragraphs 12-19), and taking into account the comments of the Chairpersons and the Codex Secretariat, CCEXEC is invited to critically:

- review standards and related texts submitted to the Commission for adoption*;*
- monitor the progress of standards development, also in accordance with the *Criteria to facilitate the conduct of monitoring progress of standards development*[3] (as agreed by CCEXEC58 [2006]); and
- review proposals for new work or revision of standards.

Ongoing development of the supporting documentation for the critical review

2. The documents to support the critical review have evolved over time with the aim of better supporting this task.
3. As indicated at CCEXEC86 (2024),[4] the Codex Secretariat is carefully reviewing the critical review documents to ensure a consistent approach including on the degree to which information from the committee reports should be included therein. This will continue to evolve as documents are developed for upcoming sessions of CCEXEC.
4. The Codex Secretariat, since CCEXEC87, has been presenting an overview of all new work proposals. For CCEXEC89, new work proposals are compiled in CX/EXEC 25/89/3 Add. 3.
5. CCEXEC88 (2025) based upon a request from CCEXEC87 (2024), discussed work management challenges related to the timeliness and translation of working documents. The current structure for the critical review focuses only on information that in addition to those found in the relevant committee report would contribute most consequentially to CCEXEC's preparations in advance of plenary sessions and which would also enable a more stringent word count.

Structure of appendices

6. The work of the different committees is addressed in separate appendices.
7. The current structure of the appendices for each committee is as follows:

A. General information on the committee and session

B. Status of work items (Overview) with explanatory notes as relevant from the Codex Secretariat and Chairperson's comments on specific work items

C. Chairperson's comments on the overall work of the committee in light of the purpose of the critical review)

List of appendices

Appendix 1: Codex Committee on Contaminants in Foods, 18th session (CCCF18)

---

[1] This document addresses the Codex Committee on Contaminants in Foods (CCCF).
[2] https://www.fao.org/fao-who-codexalimentarius/publications/procedural-manual/en/
[3] ALINORM 06/29/3A, paragraph 47.
[4] REP24/EXEC1, paragraph 11.

APPENDIX 1

A. General information on the committee and session

Committee	**Codex Committee on Contaminants in Foods (CCCF)**		
Host	The Netherlands	**Chairperson**	Dr Sally Hoffer
Co-host	Thailand	**Co-chairperson**	-
Session reported on	CCCF18	23-27 June 2025	
Next session	CCCF19	19-23 October 2026	
Report	REP25/CF18		

B. Status of work items (Overview)

Existing work item(s) for decision by the Commission (adoption, revocation, discontinuation)							
Topic	**Job number**	**Target year**	**Recommendation of the committee**	**Status of endorsement (where applicable)**	**Scientific advice (Available, on track, delayed, or N/A)**	**Reference**	**Explanatory notes (if any)**
1. Maximum level (ML) of 2.5 mg/kg for lead in spices, dried bark	N05-2019	2025	Adoption at Step 8	-	Available	REP25/CF18, paragraph 47(i)(a) and Appendix III	This ML was adopted at Step 5 by CAC47 (2024).
2. ML of 2.0 mg/kg for lead in culinary herbs, dried	N05-2019	2025	Adoption at Step 5/8	-	Available	REP25/CF18, paragraph 47(i)(b) and Appendix III	This ML was considered at Step 4 by CCCF18, along with the ML at Step 7 adopted at Step 5 by CAC47 (See point 6). CCEXEC may reassert the procedural clarification provided by the Codex Secretariat at CCCF18 as stated in REP25/CF18 paragraphs 34-35.
3. Revised *Code of practice for the prevention and reduction of aflatoxin*	N10-2024	2027	Adoption at Step 5/8	-	Available	REP25/CF18, paragraph 80(i) and Appendix V	-

contamination in peanuts (CXC 55-2004)							
4. Editorial amendment to CXS 193-1995: Removal of outdated content from Annex X - Scientific justification for the guideline levels for radionuclides in foods contaminated following a nuclear or radiological emergency	-	-	Adoption	-	N/A	REP25/CF18, paragraph 17(v) and Appendix II	-
5. Editorial amendment to CXS 193-1995: Inclusion of MLs for marine biotoxins (Section 1.5 of the *Standard for live and raw bivalve molluscs* [CXS 292-2008])	-	-	Adoption	-	N/A	REP25/CF18, paragraph 198	The editorial amendment will enable the listing of these MLs in CXS 193-1995, while maintaining them in CXS 292-2008. CAC can be informed accordingly. CCCF establishes safety levels for contaminants in food and feed and has a standing agenda item to keep Codex standards for contaminants up to date based on the availability of scientific advice as appropriate. The *Procedural Manual* recommends that commodity standards include a standard text under the section on contaminants, cross-referencing CXS 193-1995. CCEXEC may thus consider recommending the transfer of MLs for contaminants in commodity standards to CXS 193-1995 to ensure that: (a) CXS 193-1995

							remains the single authoritative reference for MLs for contaminants; (b) standards are consistent with the *Procedural Manual* recommendation that commodity standards include a standard text to cross-reference CXS 193-1995; (c) MLs stay up to date; (d) CAC and the relevant commodity committee (when active) could be informed; and (e) MLs related to standards developed by committees adjourned *sine die*, such as the Codex Committee on Fish and Fishery Products (CCFFP), could be updated.
6. ML of 2.5 mg/kg for lead in culinary herbs, dried	N05-2019	2025	Discontinuation	-	N/A	REP25/CF18, paragraph 47(ii) and Appendix III	This is the ML that was adopted at Step 5 by CAC47 (2024). It is discontinued since a new ML has been recommended for adoption (See point 2).
7. ML and associated sampling plan for total aflatoxins in ready-to-eat peanuts	N14-2014	2025	Discontinuation	-	N/A	REP25/CF18, paragraph 72(i)	-

Chairperson's comments on specific work items from the above in light of the purpose of the critical review

CCCF18 marked important progress toward strengthening Codex standards framework. A key achievement was the focused discussion on the MLs for lead in certain food categories. The outcomes bring this important topic to a conclusion. And it was agreed to discontinue work on the ML and the associated sampling plans for total aflatoxins in ready-to-eat (RTE) peanuts, noting that the data assessed was between 2014 and 2016, and no more recent data (between 2017 and 2024) had been considered. In addition, the establishment of an ML for RTE peanuts had been discussed over a long period without the required progress since this work was already extended for one year at CCCF17 to allow for its completion at CCCF18. Moreover, with the finalisation of the revised *Code of practice for the prevention and reduction of aflatoxin contamination in peanuts* at CCCF18, it was agreed to await the effects of its implementation before reconsidering new work. This additional time will allow the submission of more recent and geographically representative data, in line with the definition for RTE peanuts agreed at CCCF17.

New work proposals for approval by the Commission					
Topic	**Target year**	**Recommendation of the committee**	**Scientific advice (Available, on track, delayed, or N/A)**	**Reference**	**Explanatory notes (if any)**
8. New work on the revision of the *Code of practice for weed control to prevent and reduce pyrrolizidine alkaloid contamination in food and feed* (CXC 74-2014)	2028	Approval	N/A	REP25/CF18, paragraph 90(ii) and Appendix VI (Part I), project document available here	-
9. New work on the revision of the *Code of practice for the reduction of Aflatoxin B1 in raw materials and supplemental feedingstuffs for milk-producing animals* (CXC 45-1997)	2027	Approval	N/A	REP25/CF18, paragraph 102(ii) and Appendix VII, project document available here	Additional risk management practices will be sought through a circular letter (CL).
10. New work on the development of a code of practice for the prevention and reduction of tropane alkaloids in food and feed	2028	Approval	N/A	REP25/CF18, paragraph 106(ii) and Appendix VIII, project document available here	Additional risk management practices will be sought through a CL.

Chairperson's comments on specific new work proposals in light of the purpose of the critical review

Currently, much of the CCCF agenda is devoted to the development of CoPs. CoPs are at the core of CCCF work, as their effective implementation provides the necessary basis for establishing MLs and supports safe and sustainable food and feed production. The formalized working practice — where a discussion paper includes both the project document and a proposal for a new or revised CoP — enables CCCF to take up new work efficiently, such as the three CoPs now under consideration. The scope of each CoP was thoroughly discussed in CCCF18 and carefully considered before the project documents were approved for new work.

For information: Publication of information documents and other documents for endorsement by CCMAS		
Topic	**Reference**	**Explanatory notes (if any)**
11. Link to the IAEA document on Natural radioactivity in food, feed, and drinking-water on the Codex website, once available.	REP25/CF18, paragraph 28(iii)	-
12. Publication of the information document on guidance on data analysis for the development of maximum levels and for improved data collection (main text)	REP25/CF18, paragraph 123(i) and Appendix IX	-
13. Sampling plans and numeric performance criteria (NPC) for total aflatoxins and ochratoxin A in certain spices for inclusion in CXS 193-1995 and the *Recommended methods of analysis and sampling* (CXS 234-1999)	REP25/CF18, paragraph 62 and Appendix IV	For endorsement by CCMAS45 (2026) and adoption at Step 8 by CAC49 (2026). The NPC will be included in CXS 234-1999. The sampling plans will be located in CXS 193-1995 and will cross-reference the NPC in CXS 234-1999.
14. Revised numeric performance criteria for methods of analysis for total aflatoxins utilizing the sum of components concept in relevant sampling plans.	REP25/CF18, paragraph 133(i-iii) and Appendix X	For endorsement by CCMAS45, adoption by CAC49, and inclusion in CXS 234-1999. The sampling plans in CXS 193-1995 will be subsequently amended by cross-referencing to the NPC in CXS 234-1999.
For information: Ongoing work		
15. Code of practice for the prevention and reduction of cadmium contamination in foods	REP25/CF18, paragraph 52(i)	At Step 2/3
16. Discussion paper on the review of the *Code of practice for the reduction of acrylamide in foods* (CXC 67-2009)	REP25/CF18, paragraph 97(i)	-
17. Guidance on data analysis for the development of maximum levels and for improved data collection (Annexes I-VI)	REP25/CF18, paragraph 123(ii)-(iii)	-

18. Discussion paper on options for guidance on the application of maximum levels to spice mixtures	REP25/CF18, paragraph 143	-
19. Call for data for aflatoxins in cereal grains and cereal-derived products (Brazil/JECFA Secretariat for consideration by CCCF19)	REP25/CF18, paragraph 161(i)-(ii)	
20. Discussion paper on the review of data in the GEMS/Food database to assess the need for: ○ revising maximum levels for aflatoxins in cereal grains and cereal-derived products in CXS 193-1995; ○ considering the development of new maximum levels for specific cereals; and ○ evaluate the necessity to revise the *Code of Practice for the prevention and reduction of mycotoxin contamination in cereals* (CXC 51-2003) (For consideration by CCCF20)		-
21. Discussion paper on reviewing the maximum level for methylmercury in tuna and the associated sampling plan	REP25/CF18, paragraph 166(vi)	-
22. Discussion paper on T-2, HT-2, DAS and ergot alkaloids	REP25/CF18, paragraph 172(i)	-
23. Discussion paper on developing guidance related to food safety aspects of recycled plastics in food packaging	REP25/CF18, paragraph 189	-
24. Discussion paper on the development of a code of practice	REP25/CF18, paragraph 192	-

for the prevention and reduction of ochratoxin A contamination in dried fruits		
25. Discussion paper to identify methods or numeric performance criteria for maximum levels in CXS 193-1995 for which there are no methods in CXS 234-1999	REP25/CF18, paragraph 194	-
26. Review of Codex standards for contaminants	REP25/CF18, paragraph 166(v)	Standing item on the agenda of CCCF
27. Follow-up work on the outcomes of JECFA evaluations and FAO/WHO expert consultations	REP25/CF18, paragraph 172(ii)	Standing item on the agenda of CCCF
28. Priority list of contaminants for evaluation by JECFA	REP25/CF18, paragraph 183(ii)	Standing item on the agenda of CCCF

Chairperson's comments on specific issues for monitoring and information in light of the purpose of the critical review

I am pleased that CCCF will be developing a discussion paper focusing on T-2, HT-2, DAS, and ergot alkaloids. I have encouraged Members during several CCCF meetings to volunteer to carry out follow-up work with regard to the outcomes of the JECFA evaluations and FAO/WHO expert consultations (which also encompassed T-2, HT-2, DAS, and ergot alkaloids). Initiating consultations and evaluations without subsequent follow-up represents an inefficient use of valuable resources, and it is therefore essential to make full use of the scientific advice provided. It is encouraging that this follow up work will finally start.

CCCF18 agreed to integrate the C*ode of practice for the prevention and reduction of cadmium contamination in cocoa beans* (CXC 81-2022) into the broader code of practice for the prevention and reduction of cadmium contamination in foods, once the general provisions applicable to all foods are completed or near completion. This decision builds on the direction set at CCCF17 to avoid overlap, inconsistencies, and redundancies among CoPs, and provides a practical model for streamlining texts and enhancing coherence across Codex standards.

And I would like to note that at CAC45, Codex adopted MLs for total aflatoxins in certain cereals and cereal-based products. However, due to reservations expressed by several Members, CAC45 requested CCCF to review all MLs for these products in 5 years' time, which will be in 2027. At CCCF18 we discussed the preparation of a discussion paper to determine the feasibility of deriving revised MLs. For this discussion, JECFA prepared an analysis of occurrence data aflatoxins in cereals. CCCF18 agreed that a draft text for a call for data will be considered at CCCF19 and that an EWG, chaired by Brazil, will prepare a discussion paper for CCCF20 to assess the need for revising MLs for AFTs for cereal grains and cereal-derived products. I again encouraged CCCF-members for global sharing of occurrence data.

And CCCF has produced a document that provides practical guidance to EWGs performing data analysis for the development of MLs. Along with this guidance some specific recommendations were presented to WHO with regard to the GEMS database. The WHO JECFA Secretariat highlighted in plenary the importance of the GEMS/Food database for the work of CCCF and confirmed the feasibility of the changes proposed to the GEMS/Food database template. However, the secretariat noted that the changes could not yet be implemented due to a lack of resources and called upon the Member countries to support the work on the further development of the GEMS/Food database, as it would also benefit the work of CCCF.

C. Chairperson's comments on the overall work of the committee in light of the purpose of the critical review

CCCF18 held in Bangkok, Thailand was a great success. Co-hosting of CCCF sessions is for the Netherlands an important practice in order to promote regional collaboration, share responsibilities, and support capacity building, as it enables broader participation from delegations in the region. I am also pleased that during the meeting in Bangkok, Egypt has stepped forward to co-host CCCF19 in 2026.

As Chairperson, I kept track of the progress of EWGs during the year by consulting with the EWG chairs. I held additional sessions with those who requested further support, particularly in preparing for plenary discussions. In the plenary discussions, the influence of good work of the EWGs on a consensual outcome for discussions was again highlighted. It is important that Members understand the responsibilities of chair and co-chairs before taking on the leadership of an EWG. To support this, I organised a pre-session meeting on 22 June 2025, titled "CCCF Chair's Activity: Inspiration from EWG Chairs", which provided a platform for EWGs chairs to share experiences, lessons learned, and practical tips for future chairs. During this session, the Codex EWG handbook was also highlighted as a valuable reference tool.

For all the delegates, two pre-session meetings were organized focusing on key technical issues. These sessions were designed to deepen shared understanding and lay the groundwork for fruitful discussion in the plenary. Forward planning of work was again made explicit by presenting during the plenary meeting the draft agenda for CCCF19 with the EWGs and chairs under 'Other business and Future work'. And it was decided on the spot what could be done and which work could be postponed. This way of working gives a good overview of the work and helps also in managing the workload of the committee.

The host country secretariat also prepared a document entitled "Evaluation of the Codex Committee on Contaminants in Foods 2020-2023", which summarized feedback from post-meeting surveys over several years and outlined the follow-up to issues.

I would like to thank all participants for their active engagement and spirit of cooperation and especially our Thai collegues who made CCCF18 a wonderful experience. And I look forward to building on this momentum at CCCF19 in Cairo.