

**European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
12th Session**

Utrecht, the Netherlands, 12-16 March 2018

Agenda Item 16

**Request for comments on the discussion paper on the development of a
Code of practice for the prevention and reduction of cadmium
contamination in cocoa
(CX/CF 18/12/16)**

*Mixed Competence
Member States Vote*

The European Union and its Member States (EUMS) welcome the work on the discussion paper on the development of a Code of practice for the prevention and reduction of cadmium contamination in cocoa by the electronic Working Group chaired by Peru.

The EUMS support the development of a code of practice for the prevention and reduction of cadmium contamination in cocoa and agree with the recommendation for a progressive implementation of available mitigation measures, for the improvement of the infrastructure and equipment for drying and fermentation processes and for further work on listing validated practices. Therefore the EUMS support the project document to continue the work on the development of guidance to Member States and the cocoa processing industry on the prevention and reduction of cadmium contamination in cocoa beans during the production and post-harvest process.

The EUMS would like to comment that in the conclusions the only points that should be listed are those which are relevant for the development of a code of practice for the prevention and reduction of cadmium contamination in cocoa. Therefore, the statement that 'human intake of cocoa is low, so health risks from exposure to cadmium through cocoa consumption are low and not considered to be a health concern' should be removed from the conclusions.

The EUMS would like to comment that under the chapter 'mitigation measures for post-harvest processing', besides fermentation and drying processes also other post-harvest processes need to be considered like e.g. deshelling.

The EUMS would like to ask clarifications as to why as a mitigation measure the reduction of application rates of zinc containing fungicides is recommended, as in paragraph 28 it is indicated that increasing the levels of zinc in the soil would lead to a reduction of cadmium accumulation in cocoa. Furthermore, it is not clear why avoiding the use of pesticides in general is put forward as a mitigation measure.