

**CODEX COMMITTEE ON CONTAMINANTS IN FOOD
16th Session**

Utrecht, 18-21 and 26 April 2023

EU comments on

Agenda Item 5:

**Request for comments on maximum levels for lead in certain food
categories at steps 4 and 7.**

(CX/CF 23/16/5 and CL 2023/18-CF)

*European Union Competence
European Union Vote*

The European Union (EU) welcomes and appreciates the work on the maximum levels (MLs) for lead by the electronic Working Group chaired by Brazil.

For **brown sugar, raw cane sugar and non-centrifuged sugars** the EU can support the proposed ML of 0.15 mg/kg.

For **ready-to-eat meals for infants and young children**, the EU considers that, because children are a more vulnerable consumer group, ingredients of these foods should be selected, to ensure that the lead content is as low as reasonably achievable. Therefore, a rejection rate above 5.3% for this category would be acceptable, because once the ML is established, through the appropriate sourcing of ingredients, the rejection rate will become lower than 5%. Because at CCCF15 an ML of 0.02 mg/kg was agreed for cereal-based foods for infant and young children, this shows that it is possible to achieve concentrations of lead below 0.020 mg/kg in cereals used for foods for infants and young children. Therefore, it would not be appropriate to establish a higher ML for ready-to-eat meals for infant and young children, containing cereals or to establish a higher ML for all ready-to-eat meals for infants and young children, in order to ensure a higher compliance rate for the cereal-based ones. On the basis of the available LOQ corrected data for the entire group of ready-to-eat meals for infants and young children, an ML of 0.020 mg/kg would result in a rejection rate of 5.3%, which would be acceptable. Therefore, the EU supports a lower ML of 0.02 mg/kg in order protect children, which are a vulnerable consumer group.