

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

Utrecht, the Netherlands, 12-16 March 2018

Agenda Item 5

**Request for comments at steps 3 and 6 on proposed draft and draft
maximum levels of lead in selected commodities in the General Standard
for Contaminants and Toxins in food and feed
(CX/CF 18/12/5)**

*European Union Competence
European Union Vote*

The European Union (EU) welcomes and appreciates the work on the revision of the maximum levels for lead by the electronic Working Group led by the United States of America.

In general, the EU considers that the MLs should be lowered wherever possible. In addition, the EU would like to see a reduction of the number of very specific entries in the GSCTFF.

As regards the proposed actions for the individual commodities, the EU would like to present the following position:

For **grape juice**, the EU can support the ML of 0.04 mg/kg for grape juice.

For **processed tomato concentrates**, the EU considers that the proposed ML of lead in processed tomato concentrates should be consistent with the maximum level established for fresh tomatoes of 0,05 mg/kg. The Standard for processed tomato concentrates (Codex Stan 57-1981) foresees that tomato concentrates include “tomato puree” or “tomato paste”.

- Tomato puree contains no less than 7% but less than 24% of natural soluble solids;
- Tomato paste contains at least 24% of natural soluble solids.

If fresh tomatoes are considered to contain 6% of natural soluble solids, the theoretical lead content in tomato concentrates is:

- between 0,06 mg/kg and 0,2 mg/kg for tomato purees;
- greater than or equal to 0.2 mg for tomato pastes.

As a result, a tomato concentrate, made from compliant fresh tomatoes, may be declared non-compliant. Therefore the EU cannot support the proposed ML of 0.08 mg/kg and proposes to investigate what would be the maximum lead content in highly concentrated tomato pastes, on the basis of tomatoes containing lead levels of 0.05 mg/kg. However, in order to reduce the number of entries in the GSCTFF, the EU prefers not to set an ML for processed tomato concentrates and to apply the ML for fresh tomatoes to this commodity, taking into account a processing factor.

The note in the GSCTFF for processed tomato concentrates on the adjustment of the ML, to take into account the concentration of the product, needs to be deleted.

For **mango chutney**, in view of reducing the number of very specific entries, the EU considers that it would be preferable to combine "mango chutney" with "jams (fruit preserves) and jellies". However the ML of 0.3 mg/kg for mango chutney can be supported.

For **canned Brassica vegetables**, the EU would like to comment that the ML for canned vegetables should be in line with the one for fresh vegetables. As a Codex ML of 0.3 mg/kg is set for leafy Brassica vegetables, it is proposed not to apply the ML of 0.1 mg/kg for canned Brassica vegetables to leafy canned Brassica vegetables. The EU can support to extend the current ML of 0.1 mg/kg in canned vegetables to canned Brassica vegetables, excluding canned leafy Brassica vegetables.

For **fresh farmed mushrooms** the EU can support the ML of 0.2 mg/kg with a specification in the GSCTFF of the species to which this ML applies, because for enforcement purposes it is difficult to distinguish between farmed and wild mushrooms.

For **wine**, the EU would like to comment that the data, taken into account by the electronic working group, include data on beverages other than grape wines. For the setting of MLs, the specific characteristics of certain types of wines should be considered, like the fruit which was used and whether it concerns regular or liqueur wines. The International Organisation on Vine and Wine could contribute useful data for a new lowered ML. In view of the specificities of the production process of liqueur wines, the concentration effect, and the low consumption of these wines, only by adults, the new ML should not apply to liqueur wine. The new ML should only be set for wine, excluding liqueur wine, produced from grapes harvested after the modification of the ML, in view of the long aging period and shelf life of these wines. At this stage the European Union cannot support the proposed ML of 0.05 mg/kg for wine.

However the EU can support an ML of 0.15 mg/kg for wines, produced from grapes, harvested after the modification of the ML, excluding liqueur wines.

For **salt**, the EU would like to comment that the proposed ML wouldn't cover the levels of lead present in salt from marshes. Therefore the EU can only support an ML of 1 mg/kg for salt, excluding salt from marshes

For **spreads and blended spreads** the EU can support an ML of 0.04 mg/kg.

For **edible fats and oils** the EU can support an ML of 0.07 mg/kg.