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**European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
9th Session**

New Delhi, India, 16 – 20 March 2015

Agenda Item 7

**Proposed draft maximum levels for inorganic arsenic in husked rice
(CX/CF 15/9/7)**

*European Union Competence
European Union Vote*

The European Union (EU) welcomes and appreciates the work on the maximum level for inorganic arsenic in husked rice by the electronic Working Group led by China and co-chaired by Japan.

The EU remains supportive of a maximum level of 0.25 mg/kg for husked rice, as higher maximum levels would not result in significant reduction of dietary exposure. Based on the occurrence data obtained on rice from many countries outside Europe collected by the EU, a maximum level of 0.25 mg/kg would result in a violation rate of less than 6 %.

Regarding the inclusion of a footnote on the analysis of total arsenic as a screening tool, the EU considers that the footnote applicable to the maximum level for inorganic arsenic in polished rice can easily be extended to husked rice.

As for the guidance on the application of the maximum levels, the EU considers the maximum level applicable to the processing state in which the commodity will be sold to the final consumer should apply. However, the EU considers that national legislation is more suited than the General Standard for Contaminants and Toxins in Food and Feed for such additional provisions.

In view of the wide seasonal variation, the limited geographical origin of the occurrence data and especially of the wide variation of the ratios inorganic to total arsenic, the EU sees no advantages in the calculation of a processing factor or in the development of a polishing procedure. The development of a polishing procedure is even more compromised by the need for specific polishing equipment in all laboratories involved in analysis of arsenic in rice.

Concerning the method of analysis, the EU agrees to request the CCMAS to convert one of the three analytical methods mentioned in the document into criteria in line with the current CCMAS work.

Taking into account that husked rice is not a major component in the consumption of cereals, not even in the clusters with higher husked rice consumption and that international trade in husked rice is only 10 % of the total rice trade, the EU considers that if CCCF is unable to reach a consensus on a maximum level for inorganic arsenic in husked rice, work on maximum levels for inorganic arsenic in husked rice should be temporarily discontinued until the work on the Code of Practice for the prevention and reduction of arsenic contamination in rice is finalised.

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