

European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
13th Session

Yogyakarta, Indonesia, 29 April – 3 May 2019

Agenda Item 11

Request for comments on the discussion paper on the establishment of new
maximum levels for lead in commodities according
to a prioritisation approach
(CX/CF 19/13/9)

European Union Competence
European Union Vote

The European Union (EU) welcomes the work by the electronic Working Group chaired by Brazil on the establishment of new maximum levels (MLs) for lead in commodities according to a prioritisation approach.

The EU would like to comment on the fact that the prioritization methodology considers relative lead exposure against toxicological end-points, which do not include safety factors as typically applied to the establishment of health-based guidance values (such as a tolerable intake). Especially in view of the fact that JECFA stated that no safe level of lead has been identified, it would be more appropriate to consider the exposure of consumers as a criterion for prioritisation, instead of the intake, expressed as a percentage of the toxicological end-points.

In general, the EU agrees with the prioritisation criteria of exposure in line with the CCCF policy and with the proposed prioritisation list of foods, included in the discussion paper. The EU agrees to start new work on MLs for the priority food categories mentioned in paragraph 21, but would like to comment that for reasons of clarity, foods for infants and young children, should be included at the top of the priority list, instead on mentioning them in a separate paragraph.

As the category 'Sugars and confectionary, excluding cocoa' is an extremely broad category, the EU recommends to identify subcategories of products which may contribute in significant amount to lead exposure and to only start work on MLs for the relevant confectionary subcategories. Subsequently, a ML should be discussed for those identified subcategories, which may present a high lead contamination.

The EU agrees with a call for data for the food categories identified as priorities, but would like to point to some aspects relevant for the data collection for food for infants and young children:

-It is proposed to collect separate data for infant and follow-on formulae, instead of including them in the category 'ready to eat meals for infants and young children', as milk or soy based preparations could show a different lead content compared to foods prepared on the basis of fruits and vegetables. Furthermore, it would be appropriate to distinguish between products marketed as powder or as liquids.

-For herbal teas for infants and young children, a distinction needs to be made between products sold as liquids and products sold in a dry form, to be prepared by infusion or decoction.

The EU proposes to rephrase paragraph 3 of the project document in appendix 1 as follows: 'MLs for lead in the following food categories and the relevant subgroups of those food categories, taking into account the policy of the CCCF:

-Food for infants and young children

-Eggs and egg products

-Cereal flours and starch

-Sugars and confectionary, excluding cocoa

-Seafood

-Teas and herbal teas

-Cocoa and cocoa products

-Processed fish, excluding frozen and sliced'

The EU proposes to delete the different aspects, currently listed in paragraph 3, as they are covered by the term 'policy of the CCCF'.