

**European Union comments on
Codex Circular Letter CL 2014/11-CF**

**PART I: MATTERS FOR ADOPTION BY THE 37TH SESSION OF THE
CODEX ALIMENTARIUS COMMISSION**

**Proposed draft standards and related texts at Step 8 and 5/8 of the
Procedure**

European Union Competence

European Union Vote

**Proposed draft maximum levels for lead in infant formula and formula for special
medical purposes intended for infants and follow up formula (as consumed) (para 33,
Appendix II)**

The CCCF agreed to an ML for lead of 0.01 mg/kg in infant formula "as consumed".

The EU would like to reiterate its concerns already expressed at the CCCF Session. Taking into account the conversion/dilution factors, a level of 0.01 mg/kg in infant formula as consumed would imply that levels up to 0.08 mg/kg in powdered formula as sold would be tolerated.

Current occurrence data demonstrates that lower levels for powdered formula as sold are already achieved (0.05 mg/kg), which would allow for lower levels of lead in the product as consumed.

Therefore the EU would like to reiterate its reservation on the proposed ML for lead of 0.01 mg/kg in infant formula "as consumed".

The EU requests that this reservation is included in the report of the CAC 37.