

CODEX COMMITTEE ON CONTAMINANTS IN FOOD
16th Session

18-21 April 2023 (physical plenary meeting)
26 April 2023 (virtual report adoption)

EU comments on

Agenda Item 14

Review of prioritisation for re-evaluation of Codex standards and related texts for contaminants

(CX/CF 23/16/14 and CL 2022/85-CF)

Mixed Competence
European Union Vote

The European Union and its Member States (EUMS) welcome and appreciate the work done by Canada on a structured approach to review the Codex standards and related texts for contaminants in feed and food and wishes to provide following comments:

The EUMS agree with the prioritisation criteria and the process for the revision of Codex Standards and related texts for contaminants. As regards the highest priority list for the evaluation of Codex Standards and related texts in that list, the EU would like to share the following considerations on the topics as listed in Annex II of CL 2022/85-CF that the EU wishes to maintain on the overall highest priority list.

Concerning the topics which are not mentioned in this position paper, the EU is of the opinion that there is no need to keep these topics on the overall highest priority list for re-evaluation of Codex Standards and Related Texts for Contaminants in Feed and Food

- ML acetylated deoxynivalenol derivatives. Given that the acetylated deoxynivalenol derivatives have the same toxicological potency as the parent compound and that the presence of acetylated deoxynivalenol derivatives compared to the parent compound can it is appropriate to consider as moderate to high priority to consider the inclusion of the acetylated deoxynivalenol derivatives into the ML for deoxynivalenol.

- ML aflatoxin M1 in milk: due to the potential safety concerns (genotoxic carcinogen) and the newly available occurrence data, the EUMS consider the revision of this ML as a moderate to high priority. In connection with the review of the ML, it might be appropriate to simultaneously discuss the need to update of the Code of Practice “Raw Materials and Supplemental Feedingstuffs for Milk-Producing Animals (CXC 45-1997)” – new occurrence data available, technological advances and developments to reduce presence of aflatoxin M1 in milk.

- aflatoxin B1 CoP on raw materials and supplemental feedingstuffs for milk producing animals: see comments aflatoxin M1
- ML inorganic arsenic in husked rice: due to the potential safety concerns (genotoxic carcinogen) and the newly available occurrence data, the EUMS consider the revision of this ML as a moderate to high priority. This work should be combined with work on the revision of the CoP on arsenic in rice.
- CoP arsenic in rice: the EUMS are in favour of a revision of this Code of Practice, as new information on mitigation measures is available.
- ML total arsenic in salt: the EUMS are of the opinion that it would be good to check whether on the basis of the most recent data, there is margin to lower the ML for total arsenic in salt.
- MLs cadmium in salt, legume vegetables, pulses, wheat, cephalopods, marine bivalve molluscs and polished rice: the EUMS are of the opinion that, as new maximum levels should reflect concentrations in crops, which were produced taking into account good practices for the mitigation of cadmium, it could be considered to first draft a general code of practice for the mitigation of cadmium in agricultural crops, followed by a data collection on products to which these good practices were applied. Those data could then be used at a later stage for a possible review of the MLs. Priority could be given for a review of the MLs for legume vegetables, pulses, wheat, cephalopods, marine bivalve molluscs and rice, polished
- ML lead in cereal grains: the EUMS could support a revision of the ML for lead cereal grains on the basis of newly available occurrence data and because cereal grains are a staple food. It should be checked whether for specific cereal grains the ML could be lowered. As in the EU new occurrence data are available, this work could be listed as priority 1
- ML mercury in salt: the EUMS are of the opinion that it would be good to check whether on the basis of the most recent data, there is margin to lower the ML for total methylmercury in salt.
- ML methylmercury in tuna: the EUMS are of the opinion that due to potential safety concerns and the availability of new occurrence data, it would be good to check whether the current Codex ML can be lowered. This work aligns with ongoing CCCF work on the development of a sampling plan for mercury in fish.
- ML tin in total in cured chopped meat, cured ham, cured pork shoulder, corned beef and luncheon meat: the EUMS can support to start work on these tin MLs. As the MLs for tin in canned foods and canned beverages are in List A2 since 2023, also these MLs should be revised together with the meat MLs.
- CoP tin inorganic in canned foods: in case work is started on the tin MLs, The EUMS are of the opinion that also work on the Code of Practice should be taken along.

The EUMS have no further suggestions for standards to be added to the highest priority list for the evaluation of Codex Standards and related texts.