

**European Union comments on**  
**Circular letter CL 2021/87-CF (REV1)**

**Request for comments on the approach/methodology for the review of  
contaminant/staple food combinations for future work of the Codex  
Committee on Contaminants in Foods (Forward workplan for CCCF)**

*Mixed Competence  
European Union Vote*

The European Union and its Member States (EUMS) welcome and appreciate the work done by the Host Country, JECFA and Codex secretariats on the discussion paper on the review of staple food-contaminant combinations for future work of CCCF (CX/CF 21/14/17) and wishes to provide following answers/comments to the questions in Annex to the above mentioned circular letter.

*1. Whether the list of staple foods (see Table 2 of CX/CF 21/14/7 for the list of interest of staple foods) should be further developed by CCCF, if so how:*

**1.1 Which other staple foods to include.**

It would be appropriate to consider the food categories referred to in §13 of the document CX/CF 21/14/17 and the following food categories. They are maybe not to be considered as “staple foods” but they might be relevant for international trade and/or significant for exposure and/or frequently contaminated at high levels by certain contaminants of relevance for public health

- fruits
- nuts
- fruiting vegetables
- oil fruits
- teas, coffee, herbal infusions, cocoa (relevant for international trade)
- herbs and spices (relevant for international trade)

**1.2 How to refine of the current broad categories.**

Within each category, the foods relevant for international trade and/or significant for exposure could identified. This could be function of the contaminant under consideration.

**1.3 If this work should be part of a separate paper developed by an EWG.**

This work could be part of a separate paper developed by an EWG.

#### **1.4 Other aspects not considered above.**

Within each food group, besides aspects of international trade and consumption, certain foods within the same food category can be less or more relevant for possible contamination by a certain contaminant (to be considered when a specific food category/contaminant is selected for further work).

#### **2. If screening of publications provides sufficient information on contaminants in staple foods for prioritizing work:**

##### **2.1 If not, please indicate what should be changed or added. Note that in-depth analysis hampers the ability to screen large numbers of publications.**

For prioritizing work, known adverse health effects and / or problems in international trade are important elements to be taken into account in addition to information that results from screening of publications.

#### **3. How the 'list of interest' should be compiled:**

##### **3.1 How to weigh results for combinations resulting from the different sources, i.e. results from CCCF work and GEMs/Food Contaminants database (with bias) against results from articles.**

Results from CCCF work, results from GEMs/food Contaminants database, known health problems and trade issues should have higher weight than the outcome of screening of articles (although they can be complementary and screening from articles can provide additional information on results from CCCF / GEMs/Food Contaminants database / known adverse health effects or trade issues).

##### **3.2 Whether the number of records in the GEMs/Food database can be used as additional consideration for certain contaminants.**

This could be taken into account as for any future regulatory work sufficient occurrence data are necessary. But this is to be taken with caution, as it is acknowledged that available data on food/contaminant combinations that are not yet under discussion in CODEX or not yet regulated at national/regional level might be limited because no occurrence data have yet been generated or available data have not yet been submitted to GEMs/Food Contaminants database.

##### **3.3 Which criteria to use for selection of staple food-contaminant combinations to be included in the list.**

Known adverse health effects, presence in certain foods of possible public health concern taking into account JECFA or other international risk assessments and known international trade issues are important criteria to use for selection of (staple) food-contaminant combinations.

### **3.4 Other aspects not considered above.**

- Frequent findings of high levels of presence of a certain contaminant in a food could be an important aspect to consider.
- Availability of JECFA risk assessments or FAO/WHO expert consultations (or national/regional risk assessments in the absence of a JECFA assessment).

### **4. How the 'list of interest' should be used:**

#### **4.1 If the list should be developed further before choosing combinations for follow-up, and if so, how.**

#### **4.2 How to select new topics from the list to be explored, i.e. which other factors to take into account (see examples in Section 7.3 of CX/CF 21/14/17).**

#### **4.3 What an appropriate follow-up should be for such combinations, e.g. develop a discussion paper in an EWG.**

When a certain food /contaminant is identified as possible new work within CCCF, the list of interest could be used as a tool

- in case this food/contaminant is found relevant for new work, to verify if other foods (relevant for occurrence, consumption and trade) have to be included in the discussion.
- in case there are doubts about the relevance of launching new work, to verify if other foods/contaminant combination would be more relevant for new work, given the limited resources available.
- for a selected food/contaminant combination, a discussion paper should be developed in an EWG to provide more information on the food/contamination combination as regards occurrence, possible adverse health effects, international trade and to identify possible follow-up actions to be decided by CCCF.

### **5. How the 'list of interest' should be maintained:**

#### **5.1 If there should be periodic updates or is a single exercise sufficient.**

#### **5.2 Who should maintain this list.**

#### **5.3 Other aspects to be considered.**

List could be periodically updated (every 3-5 years). The list could be updated by the re-establishment of the working group (composed of representatives of the Host Country, JECFA and Codex secretariats) that have developed the initial paper

### **6. Other aspects not covered by points 1-5 above that may be of interest/concern.**

None