

**European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
12th Session**

Utrecht, The Netherlands, 12-16 March 2018

Agenda Item 12

**Proposed draft Guidelines for risk analysis of chemicals inadvertently
present in food at low levels**

(CX/CF 18/12/12)

*Mixed Competence
European Union Vote*

The European Union and its Member States (EUMS) welcome and appreciate the work on the draft Guidelines for risk analysis of chemicals inadvertently present in food at low levels by the electronic Working Group chaired by New Zealand and co-chaired by the Netherlands.

The EUMS wish to make the following comments on the document:

- In relation to §18 - Recommendations to CCCF: While the EUMS agree to have feed for the time being not specifically addressed in the proposed draft guidelines, the EUMS are of the opinion that it is not appropriate to explicitly exclude feed from the scope of the proposed draft guidelines and refers to the conclusion mentioned as regards the reply to Question 6, that there might be value in considering extrapolation of any cut-off values resulting from the application of these guidelines to feed, in particular for "double-use" commodities such as cereals, oilseeds, ...

As regards Appendix I:

- Point 3. Scope

- In (iii) it is proposed to delete "food crop" before phytotoxins
- In (iv) it is proposed to delete corrosion inhibitors as example of environmental contaminants.

- Point 5. Principles

- In (c) as the cut off value is dependent on the characteristics of the contaminant (cf. e.g. the Cramer classification scheme) it is appropriate to replace "A cut-off value(s) of no public health concern ..." by "An appropriate cut-off value(s) (taking into account the characteristics of the compound) of no public health concern ..."

- Point 8. Application of the decision tree for risk management decision making

- It is more accurate to refer to "Annex 1 of Appendix 1" instead of to "Appendix 1"
- Point 8.2: In order to avoid confusion with point 8.4, it is proposed to replace "and their submission for rapid evaluation as soon as possible" by "and **their intention to submit** all available information for rapid evaluation as soon as possible".
- Point 8.7, third paragraph: It is more accurate to refer to "Annex 3 of Appendix 1" instead of to "Appendix 3".

- Point 11. Training

- It is proposed to replace "it is likely that the risk assessors will be employees of the competent authority" by "it is likely that the risk assessors will be employees of the competent authority or government body/agency".

- Annex 1 of Appendix I: Decision tree

Step 2: In line with the comment on point 5 (c) it is proposed to replace "Apply the cut-off value" by "Apply the appropriate cut-off value"

The boxes (2) referring to "formal risk assessment" should be in blue or should be replaced by "request formal risk assessment" (in the latter case the boxes can remain in black).

There should be also an arrow directly from the two boxes "risk management decision" (end of the decision tree) to the box "Notify exporting country". Consequently, the dotted arrows from box "No food safety concern" and "Formal risk assessment" to the box "Notify exporting country" should be deleted.