

**CODEX COMMITTEE ON CONTAMINANTS IN FOOD
18th Session**

Bangkok, 23-27 June 2025

European Union comments on

CL 2025/03-CF

Request for comments on on the application of maximum levels to multi-ingredient products.

*European Union Competence
European Union Vote*

The European Union (EU) would like to comment on the request for comments of the Codex Secretariat on the necessity and content of further guidance for multi-ingredient products.

The EU is of the opinion that further guidance on the application of the ML for multi-ingredient products could be useful. The EU is of the opinion that such guidance could be included in Annex I of CXS 193-1995 section on the establishment of maximum levels considering the scenarios given in paragraph 5 of the Annex to CL 2025/03-CF.

The EU proposes to delete example (i) in the annex of the CL 2025/03-CF for a mixture with only one ingredient for which an ML is set, because this is a hypothetical case, as MLs are proposed for most spices. Furthermore the calculated ML is not correct:

- (a) Should the relative proportion of spice A be 1/3 of the whole mixture, an ML of $\frac{1}{3} * 2 = \mathbf{0.67}$ mg/kg can be applied for the whole mixture.

For mixtures for which only for one or a few ingredients an ML is set, an estimate should be made of the proportion on this/these ingredient(s) for estimating the ML. The following alternative example illustrates this:

A mixture is made of components A, B and C in unknown relative proportions. Component A has an ML of 2 mg/kg, and components B and C have no MLs. It is assumed by default that all components are present in the mixture in equal amounts. In this example this means $\frac{1}{3}$ of the mixture. Following this estimate, the ML of $2 \text{ mg/kg} * \frac{1}{3} = 0.67 \text{ mg/kg}$ can be applied to the whole mixture. The mixture can be considered compliant, if the analysed concentration is below 0.67 mg/kg. If the ML of 0.67 mg/kg is exceeded, the exact proportions of the ingredients should be determined, in order to calculate the correct ML, see example (ii) in the annex of the CL 2025/03-CF. For the ingredients for which no ML is set, a zero concentration should be calculated.

However the EU considers that the guidance should be restricted to mixtures, which contain mainly ingredients for which an ML is set. Such guidance will be useful for the vast majority of spice mixtures.

The EU can agree with example (ii) of application included in the Annex to CL 2025/03-CF.

The EU could agree to adding the below text to Annex I of CXS 193-1995.

If relative proportions of the mixture ingredients are unknown, and guidance of CXS 193-1995 on MLs for multi-ingredient products cannot be applied, countries or importers may decide to apply for **mixtures that contain mainly ingredients for which an ML is set**, the lowest ML of the mixture ingredients to the whole mixture. If the concentration of the contaminant is below or equal to this ML, no further testing is required, and the sample is determined to be compliant with the ML. If the contaminant concentration is above the lowest ML, follow-up inquiries on the relative proportions of ingredients shall be conducted to determine if the contaminant concentration is compliant.