

07/04/2020

**European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
14th Session**

TBD

Circular Letter CL 2020/22-CF:

Request for comments at step 3 on the proposed draft revision of the code of practice for the prevention and reduction of lead contamination in foods (CXC 56-2004)

(CX/CF 20/14/9)

*Mixed Competence
Member States Vote*

The European Union and its Member States (EUMS) welcome the work on the revision of the code of practice for the prevention and reduction of lead contamination in foods by the electronic Working Group chaired by the United States and the United Kingdom.

The EUMS would like to share the following comments:

Mitigation measures

- Paragraph 12: it is propose to state ‘using detection (for example X-ray detection) to identify and facilitate removal of lead shot.

Appendix I

- Paragraphs 4, 6, 7, 10, 12, 18, 20, 46, 47, 52: this code of practice mentions uses of lead, which have been phased out over the last decades. This includes leaded gasoline, lead-soldered cans, lead foil capsules on wine bottles, the use of lead arsenate as a pesticide. Therefore, it would be appropriate to add a chapter with “phased out uses” to highlight that these uses should not occur anymore, but that there might be remaining environmental contamination from these uses or remaining products on the market like very old wines.

-Paragraph 19: also standards set by regional authorities should be mentioned.

-Paragraph 25: it is proposed to specify 'adjusting the soil pH' in more detail by specifying the pH and possible soil amendments to achieve this e.g. increasing the soil pH through liming.

-Paragraph 25: the phrase 'add phosphate amendments to reduce the bioavailability of lead' seems contradictory to paragraph 20 on avoiding the use of lead-containing phosphate fertilisers. The text should specify in more detail which phosphate amendments are recommended, in order to avoid a misinterpretation of the recommended increased use of phosphate fertilisers, as this not only can result in an increase of the lead concentrations in the soil, but also in an increase of the cadmium concentrations. In case paragraph 25 intends to recommend an increased use of phosphate fertilisers; it is proposed to delete the sentence.

- Paragraph 44 refers to filtration aids, which are processing aids. Therefore reference should be made to the "Guidelines on substances used as processing aids 'CAC/GL 75-2010'. and in particular it should be recommended to comply with the statement under point 3.4 of these Guidelines : *Substances used as processing aids should be of food grade quality. This can be demonstrated by conforming to the applicable specifications of identity and purity recommended by the Codex Alimentarius Commission or, in the absence of such a specification, with an appropriate specification developed by responsible national or international bodies or suppliers.*"

Different types of filtration aids contain different concentration of lead for example for diatomaceous earth, the JECFA specification for lead is below 10 mg/kg and for charcoal (activated carbon) it is below 5 mg/kg. Therefore, a ranking of filtration aids, according to their lead levels, should be made.

It case that the JECFA specification is considered not strict enough to ensure low levels of lead in fruit juices, wine and beer a recommendation should be made to update the specification.

-Paragraphs 45 and 63: When discussing lead shots/bullets for wild game, it should be mentioned that there will be deposits of the shots / bullets in the shooting channel in the animal and it should be recommended that this meat should be cut off and rejected.

-Paragraph 45: Metal detectors and x-rays can be used in slaughterhouses and fish processing facilities. As the detection of lead shots in wild game is normally done at the cutting plant or in the meat processing establishment, please add also cutting plants and meat processing establishments. Furthermore it is noted that the use of metal or X-ray detectors in fish processing plants is a heavy investment to detect fishing sinkers.

The EUMS support the proposed draft revision of the code of practice.