

**European Union comments for the**  
**CODEX COMMITTEE ON CONTAMINANTS IN FOOD**  
**13<sup>th</sup> Session**

**Yogyakarta, Indonesia, 29 April – 3 May 2019**

**Agenda Item 15**

**Request for comments on the discussion paper on the establishment of**  
**maximum levels for methylmercury in additional fish species**  
**(CX/CF 19/13/13)**

*European Union Competence*  
*European Union Vote*

The European Union (EU) welcomes and appreciates the work on the discussion paper on the establishment of maximum levels (MLs) for methylmercury in additional fish species by the electronic Working Group led by New Zealand and Canada.

For EU consumers, it appears that the 95<sup>th</sup> percentile dietary exposure for mercury is close to or above the tolerable weekly intake (TWI) for all age groups and that high fish consumers can be exposed to up to 6 times the TWI, which might include pregnant women, making unborn children the most vulnerable group for health risks related to mercury. In view of the public health risks related to the consumer exposure to mercury, the EU believes that it is not appropriate to state that only species with an average methylmercury concentration greater than 0.3 mg/kg present a risk of an exceedance of the PTWI, as also species containing lower methylmercury concentrations add to the overall dietary exposure.

As regards the prioritisation of species for which work should be started for the development of new MLs, the EU supports to focus on species with an average methylmercury concentration greater than or equal to 0.3 mg/kg and a production exceeding 9000 tonnes. The EU agrees with the work programme which is proposed between 2019 and 2022, the consideration of MLs for the identified species and the further collection of data on the ratio of methylmercury to total mercury for the listed species. Furthermore, the EU supports the recommendation of further data collection for the species listed in paragraph 24 of the discussion paper.