

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 9

CX/CF 21/14/9-Add.1

April 2021

ORIGINAL LANGUAGE ONLY

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON CONTAMINANTS IN FOODS**

14th Session

(virtual)

3-7 and 13 May 2020

**REVISION OF THE *CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION
OF LEAD CONTAMINATION IN FOODS (CXS 56-2004)***

(at Step 4)

Comments at Step 3 submitted by Australia, Canada, Chile, Cuba, Ecuador, Egypt, European Union (EU),
Iraq, Japan, United States of America (USA), Thailand and
the International Union of Food Science and Technology (IUFOST)

Background

1. This document compiles comments received in response to CL 2021/14/OCS-CF issued in March 2021.

Explanatory notes on the Annex

2. The comments are hereby compiled in the Annex and are presented in table format.

**COMMENTS AT STEP 3 ON REVISION OF THE
CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF
LEAD CONTAMINATION IN FOODS (CXS 56-2004)**

GENERAL AND SPECIFIC COMMENTS

COMMENTS	MEMBER/OBSERVER
Australia does not have any comments on this Circular Letter.	Australia
Canada is of the opinion that the CoP is ready for final adoption by CAC44 (2021). Canada supports CCCF asking CCFA to request JECFA to review the lead specifications for diatomaceous earth and charcoal (activated carbon), and to also evaluate bentonite to determine if available data support development of a specification for lead.	Canada
Chile agradece la oportunidad de presentar observaciones al trabajo sobre la revisión del Código de prácticas para la prevención y reducción de la presencia de plomo en los alimentos (CXC 56-2004). Chile revisó las recomendaciones de esta carta circular y sus comentarios se exponen a continuación: Chile no tiene comentarios generales ni específicos que requieran de mayor desarrollo en el CDP y considera que está listo para avanzar y presentar al CAC esta actualización.	Chile
En la REVISIÓN DEL CÓDIGO DE PRÁCTICAS PARA LA PREVENCIÓN Y REDUCCIÓN DE LA PRESENCIA DE PLOMO EN LOS ALIMENTOS (CXC 56-2004) (en el trámite 4), Cuba agradece y apoya el documento preparado por el Grupo de trabajo por medios electrónicos dirigido por los Estados Unidos de América y copresidido por el Reino Unido y el Japón, y no presenta observaciones sobre el Código de Práctica.	Cuba
Ecuador agradece al Presidente y Copresidente del Grupo de Trabajo por Medios Electrónicos - Gte por preparar y presentar la revisión del código de prácticas para la prevención y reducción de la presencia de plomo en los alimentos. Ecuador desea comunicar que no posee observaciones generales al código de prácticas, y que dado el extenso trabajo realizado, este código estaría listo para su adopción final (en el trámite 5/8 con omisión del trámite 6/7) por parte de la Comisión del Codex Alimentarius en su 44.º período de sesiones (2021). Ecuador considera pertinente que el CCCF realice la recomendación al Comité de Códex sobre Aditivos Alimentarios para que el JECFA realice las revisiones correspondientes de las especificaciones de plomo para la tierra diatomácea y el carbón vegetal (carbón activado). Así mismo por su relevancia en el procesamiento de alimentos, se evalúe la bentonita.	Ecuador
Egypt has no comments on the document.	Egypt
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 co-chaired by the United Kingdom and Japan. The EUMS thank the electronic Work Group for taking into account their comments on CX/CF 20/14/9. The EUMS suggest replacing in paragraphs 7 and 54 'food contact substances' with 'food contact materials'.	EU

COMMENTS	MEMBER/OBSERVER
<p>The EUMS support the proposed draft revision of the code of practice and consider that is ready for final adoption by the CAC44 (2021).</p> <p>The EUMS agree to recommend the Codex Committee on Food Additives (CCFA) to request JECFA:</p> <ul style="list-style-type: none"> -to review the lead specifications for diatomaceous earth and charcoal; -to evaluate bentonite to determine if available data support the development of a lead specification. 	
Agree	Iraq
<p>Japan would like to welcome and appreciate the work on the revision of the Code of Practice (CoP) for the prevention and reduction of lead contamination in foods by the electronic working group chaired by the United States of America and co-chaired by the United Kingdom and Japan.</p> <p>Japan supports advancement of the proposed draft revision of the CoP for final adoption at Step 5/8 by the CAC44 (2021) because the COP now includes new information on sources of lead and additional mitigation measures after six rounds of comments and subsequent revisions over the last two years.</p> <p>Japan agrees to recommend CCFA to request JECFA to:</p> <ol style="list-style-type: none"> a. review the lead specification for diatomaceous earth and charcoal; and b. evaluate bentonite to determine if available data support development of a lead specification. 	Japan
<p>As this paragraph covers the practice of contaminated soils, adding the word "particularly..." could mean that the farmers should test all soil for lead levels. To make it clear that farmers should test lead levels only in soils that are near contaminated sources. Thus, Thailand proposes deleting the word "particularly for farm" Therefore, this paragraph should read as follows:</p> <p>“Where possible, farmers should test lead levels in soils that are near lead sources or that are suspected of having elevated lead levels to determine if lead levels exceed recommendations for planting by national or local authorities.”</p>	Thailand
<ul style="list-style-type: none"> • The United States, as Chair of the electronic working group (EWG), thanks the Co-Chairs, Japan and the United Kingdom, and all members of the EWG for their contributions to the revision of the Code of practice (COP) for the prevention and reduction of lead contamination in foods (CX 56-2004). • The United States supports advancement of the COP for final adoption at Step 5/8. • Since 2019, there have been six rounds of revisions, resulting in incorporation of extensive new information on lead reduction techniques used worldwide. • Compared with the current COP, the draft revised COP provides additional information on sources of lead that include corrosion of lead pipes, damaged or unused fencing batteries, consumption of waterfowl that have ingested lead pellets, and lead contaminated agricultural water ingested by livestock. • The COP provides additional information on measures to reduce lead that include: <ul style="list-style-type: none"> o Securing fencing and housing for livestockProtecting aquaculture farms from agricultural and industrial lead sources o Considering testing soil if gardens are located in areas with potentially high lead levels, and increasing soil pH through liming o Ensuring that filtration aids for processing beverages comply with the Guidelines on Substances Used as Processing Aids (CXG 75-2010), and o Using an alternative water source for food preparation that does not contain lead. 	USA

COMMENTS	MEMBER/OBSERVER
<ul style="list-style-type: none">• The United States supports CCCF recommending CCFA to request JECFA to:<ul style="list-style-type: none">a. Review the lead specifications for diatomaceous earth and charcoal (activated carbon), andb. Evaluate bentonite to determine if available data support development of a lead specification.	
IUFOST supports the revised Code of Practice and agrees that all steps needed to reduce or eliminate lead in basic food production and processing should be followed.	IUFOST