

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 17

CX/CF 22/15/16

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ORIGINAL LANGUAGE ONLY

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

15th Session

Virtual

9-13 and 24 May 2022

FORWARD WORK PLAN FOR CCCF:

REVIEW OF STAPLE FOOD-CONTAMINANT COMBINATIONS FOR FUTURE WORK OF CCCF

Comments in reply to CL 2021/87-CF

*Comments of Australia, Canada, Chile, Cuba, Egypt, European Union, Kenya,
New Zealand, Republic of Korea, Saudi Arabia, United Kingdom, United States of America (USA)*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2021/87-CF¹ issued in November 2021. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are attached in the **Annex** and are presented in table format.

¹ Codex circular letter, including CL 2021/87-CF, are available on the Codex webpage/Circular Letters: <http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/> or on the dedicated Codex webpage/CCCF/Circular Letters: <http://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCCF>

Annex**GENERAL COMMENTS**

COMMENT	MEMBER / OBSERVER
<p>Canada suggests that while it is important to identify staple foods and potential contaminants present in them, forward work planning should first consider the following principles outlined in the GSCTFF (page 6) that relate to the prioritization of contaminant and food combinations for ML elaboration:</p> <ul style="list-style-type: none"> - contaminant and food combinations should present a significant risk to public health - contaminant and food combinations should present a known or expected problem in international trade - the food is significant for the total exposure of the consumer to the contaminant <p>Canada suggests that an important part of forward work planning should involve soliciting ongoing feedback from member countries, the host country as well as the Codex and JECFA Secretariats with respect to food contaminants that meet one or more of the above criteria. Staple foods that are traded internationally that are raised as part of these discussions could be prioritized for future work.</p> <p>Canada is of the opinion that a working group or other type of forum that allows for regular dialogue on this topic would be of benefit to the forward work planning of the CCCF.</p>	Canada
<p>A framework is proposed that is run through using 20 staple food groups. The examples considered are sorghum, soya bean and yams. With these three crops then being expanded upon for relevant contaminants through CCCF/GEMS datasets and literature review to identify a list of interest. Going forward, significance to human health, trade barriers and contribution to the total exposure to the contaminant, should be incorporated in the prioritisation of the staple food and contaminant combination.</p> <p>New Zealand is of the opinion that an EWG would be the best mechanism to work through the questions asked. In order to maintain the prioritisation list, or the ability to change in prioritisation to deal with the changes in the food safety environment, a mechanism should be available to add staple food and contaminant combinations, or make changes to the priority list through period updates, for example at annual CCCF meetings.</p>	New Zealand
<p>The UK can support, in general, the approach that is outlined within the working document and we would like to make the following general comments.</p> <p>There is a continued shift and trend towards consumption of more plant-based diets and higher consumption of different plant based staple foods which is a factor that would need to be considered in terms of exposure to a number of contaminants.</p> <p>There would be a need to consider how widely traded the specific commodities are and whether the issue is local/regional or is a widely traded commodity. This would be in line with the existing criteria for identifying foods/food groups contributing significantly to total dietary exposure of the contaminant or toxin within CCCF is set out in the Codex Procedural Manual in paragraphs 10 and 11 on pages 143 and 144.</p> <p>The UK recognises that a literature search and evaluation would be subjective in nature, but careful consideration would need to be given to the criteria for acceptance of papers as an evidence base for use in the overall assessment.</p>	United Kingdom

COMMENT	MEMBER / OBSERVER
<p>The United States appreciates the work by the Host Country, JECFA, and Codex Secretariats in preparing the discussion paper, which has initiated an important conversation about staple food-contaminant combinations. Although the framework is very useful, we do not support the use and operation of this framework as is. Instead, we suggest that the framework can be examined by a Working Group, which can take into account the heavy workload of the committee, other sources of information on new work, and factor in ad hoc suggestions and the ongoing Codex standards review.</p> <p>One approach would be to incorporate relevant food-contaminant topics into a “list of interest,” similar to the list that will be maintained as part of the pilot for the review of Codex standards for contaminants in foods (i.e., the in-session working group (ISWG) on Codex standards review). Items for the list of interest could initially be solicited through a Circular Letter; an EWG could be formed to develop prioritization criteria, or ideally this work could be folded into the work of the standards review ISWG. This work should consider both the human health impact and possible trade disruptions when prioritizing food-contaminant pairs.</p> <p>In addition to using the “list of interest” for selecting new topics for future work, it could be used as one source of information to weigh the priority of competing ad hoc proposals, e.g., establishing an ML for roquefortin A in blue cheese versus aflatoxin in grains. This should be considered further in the EWG or ISWG.</p>	<p>USA</p>

SPECIFIC COMMENTS

1. **Whether the list of staple foods (see Table 2 of CX/CF 21/14/7 for the list of interest of staple foods) should be further developed by CCCF, if so how.**
 - 1.1 Which other staple foods to include.
 - 1.2 How to refine of the current broad categories.
 - 1.3 If this work should be part of a separate paper developed by an EWG.
 - 1.4 Other aspects not considered above.

COMMENT	MEMBER / OBSERVER
<ol style="list-style-type: none"> 1.1 Possibly other pulses such as chickpeas, broad beans, lentils and/or lupins. 1.2 Refinement could be based on direct evidence of harm, consumption (or trade as an indirect measure) or so-called 'high-risk' commodities – i.e. those containing multiple (related) contaminants. 1.3 No. The work undertaken by the Codex/Host secretariat is sound. Perhaps more specific refinements or detailed analysis of particular contaminant/commodity combinations could be undertaken by an EWG on a needs basis. 1.4 In the absence of a comprehensive/robust dataset, direct evidence of adverse effects (acute) or negative public health outcomes from the consumption of a particular commodity/contaminant combination could help refine the list – e.g. hospitalizations, poisonings, death etc. Only a single or few case reports could help sharpen the relative priority of a particular commodity/contaminant combination. 	Australia
<p>Respecto a si el CCCF debería seguir desarrollando la lista de alimentos básicos, en base a la información revisada, Chile considera que el enfoque presentado en el documento (CX/CF 21/14/17) proporciona un marco adecuado para identificar nuevas combinaciones de alimentos básicos y contaminantes para un posible trabajo futuro, y por lo tanto, no habría necesidad de un mayor desarrollo de la lista de alimentos básicos en esta primera instancia.</p>	Chile
<ol style="list-style-type: none"> 1.1 No 1.2 Based on each regional priority 1.4 None 	Egypt
<ol style="list-style-type: none"> 1.1 It would be appropriate to consider the food categories referred to in §13 of the document CX/CF 21/14/17 and the following food categories. They are maybe not to be considered as “staple foods” but they might be relevant for international trade and/or significant for exposure and/or frequently contaminated at high levels by certain contaminants of relevance for public health <ul style="list-style-type: none"> - fruits - nuts - fruiting vegetables - oil fruits - teas, coffee, herbal infusions, cocoa (relevant for international trade) - herbs and spices (relevant for international trade) 1.2 Within each category, the foods relevant for international trade and/or significant for exposure could identified. This could be function of the contaminant under consideration. 1.3 This work could be part of a separate paper developed by an EWG. 1.4 Within each food group, besides aspects of international trade and consumption, certain foods within the same food category can be less or more relevant for possible contamination by a certain contaminant (to be considered when a specific food category/contaminant is selected for further work). 	European Union

COMMENT	MEMBER / OBSERVER
<p>The list of interest of staple foods should be further developed by CCCF</p> <p>The other staple food which can be included is arrow roots</p>	Kenya
<p>1.1 - It is necessary to add other staple foods that are not listed based on humun consumption and trade volume.</p> <p>- It is necessary to further review the staple food-contaminant combinations that are managed as the standards in other countries but are not existing Codex standards.</p> <p>1.2 The current broad categories can be refined by specification.</p> <p>1.3 It should be developed as a separate document and reviewed by an EWG</p> <p>1.4 Consideration should be given to how this work can be done with other similar works: update of previous combinations of staple foods-contaminants, priority list, etc.</p>	Republic of Korea
<p>Saudi Arabia suggest to include ML of arsenic in fish.</p>	Saudi Arabia
<p>The United States does not consider that the list of staple foods used in the approach outlined in the CX/CF 21/14/17 needs to be further developed. The work can be taken up at this time by an EWG or in the ISWG.</p> <p>The work can be developed further by a working group such as the ISWG on standards review.</p>	USA

2. If screening of publications provides sufficient information on contaminants in staple foods for prioritizing work:

2.1 If not, please indicate what should be changed or added. Note that in-depth analysis hampers the ability to screen large numbers of publications.

COMMENT	MEMBER / OBSERVER
As a screen, the approach used by the Codex/Host secretariat is appropriate. It is likely there are significant data held by government and national testing programs, and industry, that are unpublished or not readily accessible. Strategies need to be developed to access and screen these data too – perhaps via targeted calls-for-data or direct approaches to governments or industry following the initial screen of GEMS/published scientific literature.	Australia
Yes	Egypt
For prioritizing work, known adverse health effects and / or problems in international trade are important elements to be taken into account in addition to information that results from screening of publications.	European Union
Publications provide informations necessary to evaluate whether certain staple food-contaminant needs to be considered.	Republic of Korea
We do not consider that screening of publications provides sufficient information on contaminants in staple foods for prioritizing work. Not every contaminant-commodity combination cited in the literature may be equally important in terms of public health and trade, therefore a means to prioritize literature findings is key. Also, contaminants such as PAHs or mycotoxins, that occur as different isomers, will likely result in a greater number of “hits,” skewing screening results.	USA

3. How the 'list of interest' should be compiled:

- 3.1 How to weigh results for combinations resulting from the different sources, i.e. results from CCCF work and GEMs/Food Contaminants database (with bias) against results from articles.
- 3.2 Whether the number of records in the GEMs/Food database can be used as additional consideration for certain contaminants.
- 3.3 Which criteria to use for selection of staple food-contaminant combinations to be included in the list.
- 3.4 Other aspects not considered above.

COMMENT	MEMBER / OBSERVER
<p>3.1 All data should be judged on its scientific merits – sample/study design, the use of validated methods, consistency of results across multiple analyses etc. The aim should be to combine datasets where appropriate, or if that is not possible, to observe consistent, corroborating patterns across different information sources.</p> <p>3.2 Yes, the size of the dataset is important to increase confidence/certainty.</p> <p>3.3 Consumption/trade; public health risk; evidence of an increased trend over time; high-risk commodities.</p> <p>3.4 Use of intelligence to help refine the 'list of interest' – often the emergence of a new contaminant/commodity combination will not coincide with a perfect dataset. Flexibility is needed to incorporate qualitative data or expert judgement/opinion into the weight-of-evidence.</p>	Australia
<p>Respecto al modo en que debería compilarse la "lista de interés", Chile considera que, el número de registros (es decir, la disponibilidad de datos) en la base de datos de SIMUVIMA/Alimentos debiera tener preponderancia al proponer nuevos trabajos sobre NM.</p>	Chile
<p>3.1 By comparing results using (Matching / Propensity weighting)</p> <p>3.2 Yes, as an additional source of data</p> <p>3.3 Quality checks</p> <p>3.4 None</p>	Egypt
<p>3.1 Results from CCCF work, results from GEMs/food Contaminants database, known health problems and trade issues should have higher weight than the outcome of screening of articles (although they can be complementary and screening from articles can provide additional information on results from CCCF / GEMs/Food Contaminants database / known adverse health effects or trade issues). This would be addressed by the proposed EWG/ISWG. However, a list should be one source of information for new work, along with standards review and ad hoc proposals. Interest in pursuing a topic among member countries should also be a factor.</p> <p>3.2 This could be taken into account as for any future regulatory work sufficient occurrence data are necessary. But this is to be taken with caution, as it is acknowledged that available data on food/contaminant combinations that are not yet under discussion in CODEX or not yet regulated at national/regional level might be limited because no occurrence data have yet been generated or available data have not yet been submitted to GEMs/Food Contaminants database.</p> <p>3.3 Known adverse health effects, presence in certain foods of possible public health concern taking into account JECFA or other international risk assessments and known international trade issues are important criteria to use for selection of (staple) food-contaminant combinations.</p> <p>3.4 - Frequent findings of high levels of presence of a certain contaminant in a food could be an important aspect to consider. - Availability of JECFA risk assessments or FAO/WHO expert consultations (or national/regional risk assessments in the absence of a JECFA assessment).</p>	European Union

COMMENT	MEMBER / OBSERVER
<p>3.1 Presence of data in database indicates that contaminations have been occurred, while publication results are not likely accompanied by occurrence data. Therefore, database results should be weighed more than the publication results.</p> <p>3.2 The more records in a database for a certain contaminant, the higher occurrence frequency for the contaminant. Therefore, the number of records in the GEMS/Food database can be used as additional consideration.</p>	Republic of Korea
<p>This would be addressed by the proposed EWG/ISWG.</p> <p>However, a list should be one source of information for new work, along with standards review and ad hoc proposals. Interest in pursuing a topic among member countries should also be a factor.</p> <p>3.2 Although the number of records (i.e., availability of data) in the GEMS/Food database is an important consideration when proposing new work on MLs, the number of records does not necessarily provide an indication of relevant human health impact.</p> <p>3.3 It is not clear how consideration of trade was addressed in the current proposal.</p>	USA

4. How the 'list of interest' should be used:

- 4.1 If the list should be developed further before choosing combinations for follow-up, and if so, how.
- 4.2 How to select new topics from the list to be explored, i.e. which other factors to take into account (see examples in Section 7.3 of CX/CF 21/14/17).
- 4.3 What an appropriate follow-up should be for such combinations, e.g. develop a discussion paper in an EWG.

COMMENT	MEMBER / OBSERVER
<p>4.1 This would be dependent on sourcing additional data/information – perhaps Codex could 'call-for-comment' on the proposed combinations across governments and industry to help identify refinements to the list.</p> <p>4.2 Selection should be by CCCF.</p> <p>4.3 The rationale for follow-up needs to be clearly articulated, including a discussion of the different sources of data/information and the relative priority of the work (i.e. in the context of a public health concern). The preparation of a discussion paper by an EWG would be a practical and familiar process to CCCF.</p>	Australia
<p>- Respecto de cómo debería utilizarse la "lista de interés", Chile considera que se debe usar la lista como una fuente de información preponderante, al momento de priorizar el trabajo del comité.</p>	Chile
<p>4.1 Yes</p> <p>4.2 Based on the prioritization of CCCF work</p> <p>4.3 Develop a discussion paper in an EWG</p>	Egypt
<p>4.3 When a certain food /contaminant is identified as possible new work within CCCF, the list of interest could be used as a tool</p> <ul style="list-style-type: none"> - in case this food/contaminant is found relevant for new work, to verify if other foods (relevant for occurrence, consumption and trade) have to be included in the discussion. - in case there are doubts about the relevance of launching new work, to verify if other foods/contaminant combination would be more relevant for new work, given the limited resources available. - for a selected food/contaminant combination, a discussion paper should be developed in an EWG to provide more information on the food/contamination combination as regards occurrence, possible adverse health effects, international trade and to identify possible follow-up actions to be decided by CCCF. 	European Union
<p>4.1 More combinations need to be developed to complete the potential list.</p> <p>4.2 - To select a topic from the list, the list can be made with work order. Work order needs to be separately determined by considering consumption of staple foods, trade, or risks assessment through the consumption of contaminants after identifying hazards of contaminants.</p> <ul style="list-style-type: none"> - It is necessary to consider whether evaluation of priority list should be requested to JECFA. <p>4.3 - EWG can be established to prepare a discussion paper.</p> <ul style="list-style-type: none"> - It is necessary to review in detail how many follow-up work will be performed in a period. 	Republic of Korea
<p>By the ISWG or EWG as a springboard for discussion, but not as a determinant.</p> <p>4.1. No, this should be left to the ISWG or EWG.</p>	USA

5. How the 'list of interest' should be maintained:

- 5.1 If there should be periodic updates or is a single exercise sufficient.
 5.2 Who should maintain this list.
 5.3 Other aspects to be considered.

COMMENT	MEMBER / OBSERVER
5.1 Periodic updates – every 3 years. This seems like a reasonable period of time to detect emerging patterns/trends in food/contaminant combinations. This would also allow CCCF to assist with refining the methodology/approach during the intervening period. 5.2 Codex/host secretariat. 5.3 Nil response.	Australia
Respecto de cómo se debería mantener la “lista de interés, Chile apoya la idea de realizar actualizaciones periódicas. La forma de definir esta periodicidad podría ser estudiada por medio de un Grupo de Trabajo Electrónico.	Chile
5.1 periodic updates EWG 5.2 Codex secretariat 5.3 None	Egypt
5.3 The list could be periodically updated (every 3-5 years). The list could be updated by the re-establishment of the working group (composed of representatives of the Host Country, JECFA and Codex secretariats) that have developed the initial paper.	European Union
5.1 There should be periodic updates	Kenya
5.1 - The list needs to be regularly updated. Update period needs to be determined. - If updates are needed, it should be also discussed whether combinations that have existed for long-term period should be reviewed in the list For a task to maintain the list for long time, Codex secretariats would be suitable. When the list needs to be updated by schedule, Codex secretariats can bring the issue as an agenda to CCCF	Republic of Korea
This would be addressed by the proposed ISWG/EWG. 5.1 This exercise is sufficient to raise the issue of staple food-commodity contaminant combinations. We have proposed an ISWG or EWG for further work. 5.2 This would be addressed by the proposed EWG/ISWG.	USA

6. Other aspects not covered by points 1-5 above that may be of interest/concern.

COMMENT	MEMBER / OBSERVER
<p>Where data are limited, and commodities are similar in terms of production, consumption etc, perhaps data or information could be pooled, or an adequately representative commodity within a staple food group used as a surrogate.</p> <p>The analysis of radionuclides should be excluded from the analysis (see Table 2 in CX/CF 21/14/17) given the decision of CCCF14 not to pursue the establishment of standards for radionuclides in non-emergency situations due to the absence of public health and safety issues. Pesticides (e.g. atrazine) should also be excluded.</p> <p>Perhaps the draft 'list of interest' could be hosted on the Codex website with the functionality that Codex members and observers can add additional information in real-time. This information is not the polished, validated data that would be submitted to GEMS but rather more qualitative or preliminary data that would still inform and value-add to decisions on future work priorities.</p>	Australia
None	Egypt