CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 16 **CX/CF 23/16/14**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

16th Session

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REVIEW OF CODEX STANDARDS FOR CONTAMINANTS

Comments in reply to CL 2022/85-CF

submitted by
Comments of Canada, Ecuador, Egypt, Japan, Kenya, Iran, New Zealand, Peru, Republic of Korea, United States of America (USA), American Oil Chemists' Society (AOCS)

Background

1. This document compiles general and specific comments (Annexes I, II and IV of CL 2022/85-CF) received through the Codex Online Commenting System (OCS) in response to CL 2022/85-CF[1] issued in January 2023.

Explanatory notes on the Annex

2. General and specific comments submitted through the OCS are hereby annexed and presented in tabulated format.

[1] http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/
https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-circular-letters/en/?committee=CCCF

Annex

GENERAL COMMENTS

COMMENT	MEMBER
Canada provided a number of recommendations for standards to include in the Overall Highest Priority List for Re-Evaluation of Codex Standards and Related Texts for Contaminants in Food and Feed in advance of CCCF15 (2022). Canada has no new standards to recommend for inclusion in the Overall Highest Priority List this year. Canada does not volunteer at this time to lead or co-lead any of the items in the Overall Highest Priority List. Canada suggests the following changes to update and improve the clarity and conciseness of Lists: 1. A column should be added to Lists A and B to indicate if each standards is also included in the Overall Highest Priority List and the year it was added, if applicable. 2. The columns titled "Prioritization Criteria Cited" and "Other Comments or Rationale" can be removed from Lists A and B, as the standards are not being prioritized within these lists as agreed to by CCCF15 (Rep REP22/CF15, para 218 (b)). These columns can be retained and populated only in the Overall Highest Priority List which is where standards are being prioritized for review, as agreed to by CCCF15 (Rep REP22/CF15, para 218 (a)). 3. CCCF15 agreed to four new prioritization criteria (Rep REP22/CF15, para 218 (g)) relating to i) staple foods, ii) relevance to developing countries, iii) efficiencies with other work, and iv) member country volunteers. Therefore, for some of the standards in the Overall Highest Priority List, certain information in the "Other Comments or Rationale" column should now be moved to the "Prioritization Criteria Cited" column. 4. The first column titled "Contaminant" can be removed from Lists A, B and the Overall Highest Priority List, as it's redundant with the new row headings listing each contaminant name. 5. It would be useful if the ML value was included in the "Type of Standard" column in Lists A and B, as has been done in the Overall Highest Priority List. 6. The organization of standards within each list is unclear. Suggest to list all standards alphabetically in each Lists A.1, A.2 and B, as has been done in the Overall Highest Priority List. After the title of each list, the existing note can be modified to read: the standards within in this list are in alphabetical order and the lists are not presented in order of priority). 7. Additional standards should now be in List A.2 as this year they meet the date criterion for inclusion in this List, i.e. Established or reviewed ≥15 and <25 years ago (between 1998 and 2007): i) Arsenic in fat spreads and blended spreads; MLs, established in 2007. ii) Tin in canned foods; tin in canned beverages; MLs, established in 2007. 8. For previous revisions denoted in the Lists with the text "(revised)", the text in quotations can now be removed from the tables as the revisions were agreed to by CCCF15 in 2022. 9. In the Overall Highest Priority List, when it reads "see [X member country's] comments for [X standard]", for ease of comprehension, it would be useful if all pertinent prioritization-related information could be entered in the row for each standard.	**Canada**
En respuesta a la Carta Circular CL 2022/85-CF, Ecuador agradece al Grupo de Trabajo electrónico dirigido por Canadá por el trabajo realizado para el establecimiento de prioridades para la reevaluación de las normas y textos afines del Codex para contaminantes. Ecuador desea sugerir la siguiente lista de priorización de reevaluaciones, mismas que se remitirán por correo a la secretaría	**Ecuador**
Egypt agrees on the priority lists with no comments	**Egypt**

COMMENT	MEMBER
Japan appreciates the efforts of Canada in leading this important work. Japan is interested in leading or co-leading some items listed in the Overall Highest Priority List and will incidate specific items once agreement is reached among the relevant ministries/stakeholders.	**Japan**
Kenya Proposes for CCCF16 to consider giving priority to the following items in decreasing priority 1. ML for aflatoxins in peanuts intended for further processing (Priority 2). Rationale: since aflatoxins are genotoxic carcinogens, and there are possible defficiencies with other work Aflatoxins in Peanuts CoP (CXC 55-2004), where in List A.2 (Priority 2); CCCF is currently elaborating an ML for aflatoxins in RTE peanuts. 2. Aflatoxins in Peanuts CoP (CXC 55-2004) Rationale: CCCF is currently elaborating an ML for aflatoxins in RTE peanuts. 3. ML for Aflatoxin M1 in Milks Rationale: In List A.2 (Priority 2); aflatoxin M1 is a genotoxic carcinogen; possible efficiencies with other work – i) CoP for Raw Materials and Supplemental Feeding stuffs for Milk-Producing Animals (CXC 45-1997) in List A.2; ii) CoP for mycotoxins in cereals (CXC 51-2003) established in 2003 and since updated. 4. CoP for Raw Materials and Supplemental Feeding stuffs for Milk-Producing Animals (CXC 45-1997) Rationale: aflatoxin M1 is a genotoxic carcinogen; possible efficiencies with other work concerning CoP for Raw Materials and Supplemental Feeding stuffs for Milk-Producing Animals (CXC 45-1997) in List A.2. 5. Patulin in apple juice ML Rationale: In List A.2 (Priority 2); in revised List (Priority 2); dated JECFA evaluation (JECFA44, 1995) in 2007 as ML was established and not high priority (ALINORM 07/30/41, para. 127); possible defficiencies with other work-patulin in apple juice CoP (CXC 50-2003) in List A.2. 6. Patulin in apple juice CoP (CXC 50-2003) Rationale: dated JECFA evaluation (JECFA44, 1995) in 2007 as ML was established and not high priority (ALINORM 07/30/41, para. 127); possible efficiencies with other work – i) patulin in apple juice CoP (CXC 50-2003) in List A.2 7. Tin in canned foods [in tinplate cans] CoP (CXC 60-2005) In List A.2 (Priority 2); Rationale: Possible efficiencies with other work i) the two MLs for tin in foods and beverages packaged in tinplate packaging will be in List A.2 in 2023; there are 5 MLs for tin meats not packaged in tinplate cans in List A.1. 8. Cadmium in listed food commodities (certain cereal grains, legume vegetables, pulses, Brassica vegetables, bulb vegetables, fruiting vegetables, certain leafy vegetables, certain root and tuber vegetables, certain stalk and stem vegetables, wheat, cephalopods, marine bivalve molluscs, rice, polished): potential safety concern is moderate to high (priority level 1) – new occurrence data available, new dietary exposure data available, new health-based guidance value (HBGV), updated health risk assessment available from JECFA. 9. Fumonisins Rationale: MLs for maize is long overdue and necessary to protect consumer health, considering that maize is a staple food in most parts of the African continent. 10. Acrylonitrile & vinyl chloride Rationale: In List A.1 (Priority 1). For possible consideration for future topics for forward work planning, CCCF briefly discussed future food packaging and food contact materials, noting that these compounds are covered by the scope of the definition of a contaminant (CX/CF 19/13/18, Appendix D).	**Kenya**

COMMENT	MEMBER
New Zealand would like to indicate its agreement of the prioritization criteria and process for the revision of Standard and related texts for contaminants. New Zealand does not wish to add any prioritization criteria in Annex III , and doesn't have any comments or improvements on the prioritization process. New Zealand is willing to lead the re-evaluation of the ML for methylmercury in tuna	**New Zealand**
De acuerdo a lo solicitado, el Perú no cuenta con observaciones y/o comentarios	**Peru**
Among the priority categories indicated in Annex III, we consider that `staple food`and `efficiencies with other work`, this two criterias would be helpful to setting priorities. For the preparation of the Annex II list, we suggest to give priority a contaminant which is the highest priority(1) listed in Annex III (e.g.) A contaminant which is with staple food(1) + developing countries(1) + new occurrence data available(1) is processed first than other one with staple food(1) + developing countries(1) + expanded scope(3). [1=highest priority, 3=lowest priority]	**Republic of Korea**
i and ii. The U.S. suggests new work be prioritized for: • Cadmium COP (U.S. willing to chair or co-chair). o Relevant criteria: Staple food, developing countries, technological advances, expanded scope, member volunteer. • Source directed measures to reduce contamination of foods with chemicals COP (CXC 49-2001) (U.S. willing to chair or co-chair, depending on other projects). o Relevant criteria: Staple food, developing countries, technological advances, expanded scope, member volunteer. The U.S. also supports new work, with a lower priority, on: • ML for patulin in apple products other than apple juice. o Relevant criteria: Staple food, developing countries, expanded scope There do not appear to be sufficient recent data on acetylated deoxynivalenol derivatives in raw cereal grains in GEMS/Food to support work now. The U.S. FDA is not testing for these derivatives at this time. We suggest postponing new work for up to 3 years to allow time for data collection. The U.S. does not support prioritizing new work on a review of the ML for total aflatoxins in peanuts for further processing (FFP), as the Committee is currently struggling with data categorization for peanuts FFP and peanuts ready to eat (RTE). iii. To respond to questions about prioritization criteria, we identified candidates with a Priority 1 ranking in the OHPL. We reviewed these candidates and then identified those for which we saw reasons not to proceed with new work (see Table below). Based on this review, other criteria that may be useful to consider when placing candidates on the OHPL are: whether there are new occurrence data from the regions of concern and whether there are pending risk assessments or related work. Table: Review of Priority 1 candidates AFT M1 in milk ML Rationale for Priority 1 in OHPL: new occurrence data Possible reasons not to proceed with new work: JECFA did not support lower ML. Very sensitive methods required at 0.05 mg/kg.	**USA**

COMMENT	MEMBER
Arsenic in fats and oils ML Rationale for Priority 1 in OHPL: list A1 Possible reasons not to proceed with new work: Wait until JECFA completes new arsenic assessment Arsenic in husked rice ML Rationale for Priority 1 in OHPL: new occurrence data Possible reasons not to proceed with new work: Wait until JECFA completes new arsenic assessment Arsenic in husked rice ML Rationale for Priority 1 in OHPL: new occurrence data Possible reasons not to proceed with new work: Wait until JECFA completes new arsenic assessment As, Cd, Hg in salt MLs Rationale for Priority 1 in OHPL: list A1 Possible reasons not to proceed with new work: Wait until JECFA completes new arsenic assessment Fumonisins ML Rationale for Priority 1 in OHPL: new occurrence data Possible reasons not to proceed with new work: No information in CL on new occurrence data other than from Canada; occurrence data would be needed from Africa and Asia Methylmercury in tuna ML Rationale for Priority 1 in in OHPL: new occurrence data Possible reasons not to proceed with new work: Pending FAO/WHO assessment and sampling plan Tin MLs Rationale for Priority 1 in OHPL: list A1 Possible reasons not to proceed with new work: Higher tin MLs are in place for other foods	
It is surprising that Cadmium in chocolate is not under consideration.	**AOCS**

SPECIFIC COMMENTS

ANNEX I: TRACKING LISTS OF CODEX STANDARDS AND RELATED TEXTS FOR CONTAMINANTS PRIORITIZATION FOR POSSIBLE RE-EVALUATION

COMMENT	MEMBER
Aflatoxin B1 List A.2 (priority 2)HBGV cannot be established(priority 1) We propose a new general criteria as provided in Annex IV. List A.2 (priority 2)Stable food(priority 1) Milks are staple foods.	**Japan**
Arsenic, total Edible fats and oils List A.1 (priority 1)New occurrence data available(priority 1) The data used to establish the current ML is unknown and it is believed that there is new data created over the past 40 years. Japan submitted occurrence data to GEMS/Food on arsenic in edible oils and fats distributed in Japan in 2018. List A.1 (priority 1)New HBGV available(priority 1) JECFA72(2010) withdrew the previous PTWI. Salt, food grade List A.1 (priority 1)New occurrence data available(priority 1) The data used to establish the current ML is unknown and it is believed that there is new data created over the past 35 years. List A.1 (priority 1)New HBGV available(priority 1) JECFA72(2010) withdrew the previous PTWI.	
Cadmium List A.1 (priority 1)New HBGV available(priority 1) JECFA73(2010) withdrew the previous PTWI and established a new PTMI. List A.1 (priority 1)New occurrence data available(priority 1) The data used to establish the current ML is unknown and it is believed that there is new data created over the past 35 years.	

COMMENT	MEMBER
Mercury List A.1 (priority 1) (revised) (Canada, CX/CF 22/15/17)New occurrence data available(priority 1) The data used to establish the current ML is unknown and it is believed that there is new data created over the past 35 years. List A.1 (priority 1) (revised) (Canada, CX/CF 22/15/17)New HBGV available(priority 1)[A1] JECFA72(2010) withdrew the previous PTWI for total mercury and established a new PTWI for inorganic mercury.	
Tin, Total List A.1 (priority 1) List B (priority 2) (revised) (Canada, CX/CF 22/15/17)COP available(priority 2) We propose a new criteria for ML as provided in Annex IV. A new COP was established in 2005 and signficant reduction can be expected.	
Aflatoxins, total Peanuts COP 2004 ML List A.2 (priority 2) Developing countries (priority 2) Peanuts are produced all over the world, including in developing countries, and there are concerns about the spread of aflatoxin contamination due to climate change. HBGV cannot be established (priority 1) We propose a new general criteria as provided in Annex IV. Technological advance (priority 2) A sorting machine with much improved performance and other technics is now available.	

COMMENT	MEMBER
Efficiency with other work (priority 2) CCCF is currently elaborating an ML for aflatoxins in RTE peanuts. Comparable COP updata (priority 3) COP for treenuts was updated in 2010 and COP for cereals was revised in 2017. CoP ~~(CXC 59-2005)~~(CXC55-2004) Document number of the COP was corrected. List A.2 (priority 2) (revised) (Canada, CX/CF 22/15/17)COP available(priority 2) We propose a new criteria for ML as provide in Annex IV. A new COP was established in 2004 and signfican reduction can be expected. List A.2 (priority 2) (revised) (Canada, CX/CF 22/15/17)Efficiency with other work(priority 2) CCCF is currently elaborating an ML for aflatoxins in RTE peanuts. List A.2 (priority 2) (revised) (Canada, CX/CF 22/15/17)HBGV cannot be established(priority 1) We propose a new general criteria as provide in Annex IV.	
Aflatoxin M1 List A.2 (priority 2)COP available(priority 2) We propose a new criteria for ML as provided in Annex IV. The COP was established in 1997 and signficant reduction can be expected. List A.2 (priority 2)Stable food(priority 1) Milks are staple foods. List A.2 (priority 2)COP available(priority 2) We propose a new criteria for ML as provided in Annex IV. The COP was established in 1997 and signficant reduction can be expected. List A.2 (priority 2)HBGV cannot be established(priority 1) We propose a new general criteria as provided in Annex IV.	

COMMENT	MEMBER
Cadmium List A.2 (priority 2)New dietary exposure data available(priority 1) [substantive] JECFA91(2021) conducted a new exposure assessemt. List A.2 (priority 2)New occurrence data available(priority 1) Japan submitted occurrence data on cadmium in cereals, vegetables and vegetable products, fruits and fruits products, eggs, seaweed and green tea distributed in Japan in 2009-2019 in response to call for data by FAO/WHO in 2018. Japan can also submit new occurrence data on cadmium in several foods. List A.2 (priority 2)New HBGV available(priority 1) JECFA73(2010) withdrew the previous PTWI and established a new PTMI. List A.2 (priority 2)Stable food(priority 1) Cereals and vegetables are staple foods.	
Patulin Apple juice List A.2 (priority 2)New occurrence data available(priority 1) Japan can submit new occurrence data on patulin in apple juices. List A.2 (priority 2)COP available(priority 2) We propose a new criteria for ML as provided in Annex IV. The COP was established in 2003 and signficant reduction can be expected.	
Contamination (general) Arsenic, total ML for total arsenic in fat spreads is added because it was missing in list A.2. Fat spreads and blended spreads ML 2007 n/a List A.2 (priority 2) The ML was established in 2007 and met the criteria for established more than 15 years ago in 2022. New HBGV available (priority 1) JECFA72(2010) withdrew the previous PTWI.	

COMMENT	MEMBER
Contamination (general) Contamination (general) List A.2 (priority 2)Member volunteer(priority 2) USA has expressed a willingness to lead as shown in Annex II.	
Lead Milk Staple food(priority 1)New occurrence data available (priority 1) (Canada, CX/CF 22/15/17) Milk Recommendation for re-evaluation(priority 2)New occurrence data available (priority 1) (Canada, CX/CF 22/15/17) Japan proposes refinement of the criterion “Recommended for re-evaluation”as shown in Annex IV.	
Cereal grains Staple food(priority 1)New occurrence data available (priority 1) (Canada, CX/CF 22/15/17) Cereal grains Recommendation for re-evaluation(priority 2)New occurrence data available (priority 1) (Canada, CX/CF 22/15/17) Japan proposes refinement of the criterion “Recommended for re-evaluation”as shown in Annex IV.	
Table olives Recommendation for re-evaluation(priority 2) Japan proposes refinement of the criterion “Recommended for re-evaluation”as shown in Annex IV.	
Jams, jellies, marmalades Recommendation for re-evaluation(priority 2) Japan proposes refinement of the criterion “Recommended for re-evaluation”as shown in Annex IV.	
Acetylated Deoxynivalenol Derivatives Recommendation for re-evaluation(priority 2)New occurrence data available (priority 1) (European Union (EU), CX/CF 22/15/17) (Canada, CX/CF 22/15/17) (Japan, CX/CF 22/15/17) Japan proposes refinement of the criterion “Recommended for re-evaluation”as shown in Annex IV.	
Fumonisins (B1 + B2) COP available(priority 2)New occurrence data available (priority 1) (Canada, CX/CF 22/15/17) We propose a new criteria for ML as provide in Annex IV.	
Recommendation for re-evaluation(priority 2)New occurrence data available (priority 1) (Canada, CX/CF 22/15/17) Japan proposes refinement of the criterion “Recommended for re-evaluation”as shown in Annex IV.	

COMMENT	MEMBER
Arsenic Inorganic Arsenic "The Committee agreed to advance the ML of 0.35 mg/kg for husked rice for adoption by CAC39 on the understanding that the ML would be reviewed three years after the implementation of the CoP for the prevention and reduction of arsenic in rice (CXC 77-2017), and would take into account all available data to clearly lower the ML of 0.35 mg/kg." (REP16/CF10, para. 44)CAC39 adopted the proposed ML of 0.35 mg/kg for in-As in husked rice on the understanding that the ML would be reviewed three years after the implementation of the COP,as agreed by CCCF, and would tale into account all available data from all regions.(REP16/CAC, paras. 58-66) COP available(priority 2)New occurrence data available (priority 1) (EU, CX/CF 22/15/17) (Japan, CX/CF 22/15/17) We propose a new criteria for ML as provided in Annex IV. Recommendation for re-evaluation(priority 1)New occurrence data available (priority 1) (EU, CX/CF 22/15/17) (Japan, CX/CF 22/15/17) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV. Arsenic Recommendation for re-evaluation(priority 3)New information on prevention measures of arsenic contamination in rice (priority 2) (Japan, CX/CF 22/15/17) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Methylmercury Recommendation for re-evaluation(priority 1)New occurrence data available (priority 1) (EU, CX/CF 22/15/17) (Canada, CX/CF 22/15/17) (Japan, CX/CF 22/15/17) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Aflatoxin M1 Recommendation for re-evaluation(priority 1)List B (priority 2) (revised) (Canada, CX/CF 22/15/17) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Patulin Recommendation for re-evaluation(priority 1)List B (priority 2) (revised) (Canada, CX/CF 22/15/17) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Tin, total Recommendation for re-evaluation(priority 1)List B (priority 2) (revised) (Canada, CX/CF 22/15/17) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	

COMMENT	MEMBER
Aflatoxins, total Maize grain, destined for further processing ~~2022 (pending approval by CAC45, 2022)~~ 2022 ~~2027~~2025 (CCCF to consider if call for data should be issued in advance) "Diverse views were expressed on the proposed ML." (REP22/CF15, para. 116) "The Chair, noting the diverse views, proposed to consider an ML of 15 µg/kg as a compromise and noted that CCCF could review the ML within 5 years' time to see if it could be adjusted. She further noted that Members should continue to implement the CoP for the prevention and reduction of mycotoxin contamination in cereals (CXG 51 – 2003) and to generate and submit data to GEMS/Food for the later review of the ML. The other option was to discontinue work on this ML." "The JECFA Secretariat urged delegates to take into consideration that most health benefit would be achieved already by setting an ML of 20 µg/kg. While a comparatively lower ML of 15 or 10 µg/kg, respectively, would realize further incremental gains in its protective value for public health, the magnitude of those increments was considerably lower than and paled in comparison to the public health benefits that is realized by setting the ML at the higher end of the proposed values, compared to setting no ML […]" "The Representative of WHO expressed the view that while WHO would like to see an ML as low as possible for a potent genotoxic carcinogen such as aflatoxin he also noted the differences in views of which ML to establish. Therefore, in order to best protect public health under these circumstances, WHO informed CCCF that from a WHO perspective an ML for aflatoxins was better than no ML." (REP22/CF15, paras. 121-123) "CCCF [...] noted the reservations of Kenya, Rwanda and Uganda for the reasons expressed in paragraph 124." (REP22/CF15, paras. 129-133) (see REP22/CF15 paras. 116-128 for the full discussion and member country comments)CAC45 requested CCCF to undertake a review of all the MLs for total aflatoxins in three years' time, if sufficient data were submitted by Members through GEMS/Food, but in any event to undertake this review in no more than five years' time.(REP22/CAC, para. 72) Reflects a recommendation of the CAC45. Recommendation for re-evaluation(priority 1) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Flour meal, semolina and flakes derived from maize "Diverse views were expressed on the proposed ML." (REP22/CF15, para. 116) "Those not in favor of the ML, reiterated their views that MLs should be set as low as reasonably achievable. It was further noted that there was a large year-to-year variation in all regions of the world. Proposals were made for lower MLs of 2.5 µg/kg or 4 to 5 µg/kg. It was noted that an ML of 2.5 µg/kg, for example, would result in a significant reduction for human exposure to aflatoxins, with an acceptable rejection rate of 4%." "The Chair reiterated that data could be reviewed again within 5 years' time similar for the maize grain, to see if the ML could be adjusted and that Members were encouraged to continue to generate and submit data to GEMS/Food." (REP22/CF15, paras. 131-132) "CCCF […] noted the reservations of Egypt, EU and Kazakhstan for the reasons expressed in paragraph 131." (REP22/CF15, para. 133)CAC45 requested CCCF to undertake a review of all the MLs for total aflatoxins in three years' time, if sufficient data were submitted by	

COMMENT	MEMBER
Members through GEMS/Food, but in any event to undertake this review in no more than five years' time.(REP22/CAC, para. 72) Reflects a recommendation of the CAC45. Recommendation for re-evaluation(priority 1) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Husked rice "Those not in favor of the ML, expressed the view that: The ML should be set as low as reasonably achievable; high consumption of husked rice in their countries, particularly because of its promotion as part of a healthier diet coupled with such a high ML may pose a greater risk to their consumers; lower MLs were already implemented at country or regional level; it was difficult to distinguish rice destined for further processing from rice for direct consumption." "The Chair reminded CCCF that the ML under consideration was already a lower ML than the originally proposed ML of 25 µg/kg and that the ML could be reviewed in 5 years' time and that Members were encouraged to continue to generate and submit data to GEMS/Food." (REP22/CF15, paras. 135-136, 138) "CCCF […] noting the reservations of Egypt, EU, Kazakhstan, Kenya, Singapore and Sudan for the reasons expressed in paragraph 136." (REP22/CF15, para. 139)CAC45 requested CCCF to undertake a review of all the MLs for total aflatoxins in three years' time, if sufficient data were submitted by Members through GEMS/Food, but in any event to undertake this review in no more than five years' time.(REP22/CAC, para. 72) Reflects a recommendation of the CAC45. Recommendation for re-evaluation(priority 1) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Sorghum grain, destined for further processing "CCCF supported the ML, while noting that the data used to derive the ML was mainly from one country and ideally, MLs should be based on more representative data. A proposal was made to set the ML at 15 µg/kg at this time and that the ML should be reviewed in 5 years' time with more data from different regions, especially those with high consumption of sorghum." (REP22/CF15, para. 141) CAC45 requested CCCF to undertake a review of all the MLs for total aflatoxins in three years' time, if sufficient data were submitted by Members through GEMS/Food, but in any event to undertake this review in no more than five years' time.(REP22/CAC, para. 72) Reflects a recommendation of the CAC45. Recommendation for re-evaluation(priority 1) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Cereal-based foods for infants and young children (excluding foods for food aid programs) "Diverse views were expressed on the proposed ML." (REP22/CF15, para. 143) "Those opposed to the ML, expressed the views that: ML for aflatoxin should be set as low as reasonably achievable, in particular for foods destined for infants and young children; […] these foods played an important role in the complementary feeding period for infants and other than milk, exclusive feeding of the products, made infants even more vulnerable to the dietary risk of contaminated cereals; a lower ML was achievable by sourcing cleaner ingredients." "Those in favor of the ML expressed the following views: while they could not support the initial EWG proposal of 10 µg/kg, the current proposal was more acceptable and that it was better to have at least an ML rather than none; by already lowering the ML from 10 µg/kg to 5 µg/kg, there would be a significant protection of the health of infants and young children and could be reasonably achieved; the ML could be reviewed at a later stage to see if it could be adjusted." (REP22/CF15, para. 144-145)	

COMMENT	MEMBER
"CCCF […] noting the reservations of the Egypt, EU, Iran, Kenya, Kazakhstan, Russian Federation, Singapore, Uganda and the United Kingdom for the reasons expressed in paragraph 144." (REP22/CF15, para. 150) (see REP22/CF15 paras. 143-150 for the full discussion and food aid program comments)CAC45 requested CCCF to undertake a review of all the MLs for total aflatoxins in three years' time, if sufficient data were submitted by Members through GEMS/Food, but in any event to undertake this review in no more than five years' time.(REP22/CAC, para. 72) Reflects a recommendation of the CAC45. Recommendation for re-evaluation(priority 1) Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Cereal-based foods for older infants and young children for food aid programs (See above for Cereal-based foods for infants and young children (excluding foods for food aid programs)). "CCCF […] noting the reservations of the Egypt and EU consistent with their reservations on cereals-based foods for infants and young children." (REP22/CF15, para. 150)CAC45 requested CCCF to undertake a review of all the MLs for total aflatoxins in three years' time, if sufficient data were submitted by Members through GEMS/Food, but in any event to undertake this review in no more than five years' time.(REP22/CAC, para. 72) Reflects a recommendation of the CAC45. Recommendation for re-evaluation(priority 1)Japan proposes refinement of the criterion "Recommended for re-evaluation"as shown in Annex IV.	
Aflatoxin M1 Iran agrees to revise the limit of Aflatoxin M1 in milk and reduce it, because of genotoxic carcinogen properties of it and according to ALARA in foods the level should therefore be as low as reasonably achievable.	**Iran**

ANNEX II: OVERALL HIGHEST PRIORITY LIST FOR RE-EVALUATION OF CODEX STANDARDS AND RELATED TEXTS FOR CONTAMINANTS IN FOOD AND FEED

COMMENT	MEMBER
Aflatoxins (total) Peanuts intended for further processing Canada offers, for consideration, that the concurrent development of MLs for food commodities in different stages of processing helps ensure any MLs developed take into consideration relative proportionality to each other and the impacts of processing on contaminant concentrations. The CCCF's current agenda item to elaborate an ML for aflatoxins in RTE (ready-to-eat) peanuts provides an excellent opportunity to also review the existing ML for aflatoxins in peanuts for further processing (FFP). Elaborating MLs for both RTE and FFP peanuts at the same time would likely help in the development of reasonable, achievable and science-based ML values for peanuts in different stages of processing.	**Canada**
Methylmercury Aligns with ongoing CCCF work ~~to elaborate MLs for methylmercury in fish and developing~~ develop a sampling plan. (Canada, CX/CF 22/15/17) Elaboration of MLs for methylmercury in fish are no longer on the CCCF agenda. CCCF14 (2021) agreed to discontinue work to elaborate ML for methylmercury in fish except orange roughy and pink cusk eel (REP21/CF), and ML elaboration for orange roughy and pink cusk eel was completed by CCCF15 in 2022 (REP22/CF15).	
Cadmium Consider first drafting a CoP for the mitigation of cadmium in crops, followed by a data collection on products and possible review of the MLs after the application the CoP. (EU, CX/CF 22/15/17) eWe support the opinion of considering first elabolating a COP for the prevention and reduction of cadmium in cereals and vegetables. In that case, we believe that a review of MLs should be done after the dissemination and implementation of the COP.	**Japan**

ECUADOR

Lista general de máxima prioridad para la reevaluación de normas del Codex y textos afines para contaminación en alimentos y piensos

(se enlistan sin ningún orden de prioridad en particular)

Contaminante	Alimento (S)	Tipo de Norma (valor de NM/NR o N° de CdP)	Año de establecimiento	Normas correspondientes (Lista)	Criterios de priorización	Otros comentarios o información	Recomendado por (documento N°)	Voluntario
Cloruro de vinilo monómero y acrilonitrilo								
Cloruro de vinilo	Alimento	NR	1991	N/A	• Lista A.1 (prioridad 1) • Alimento básico • País en desarrollo		Canadá (CX/CF/ 22/15/17)	
Acrilonitrilo	Alimento	NR	1991	N/A	• Lista A.1 (prioridad 1) • Alimento básico • País en desarrollo		Canadá (CX/CF/ 22/15/17)	
Arsénico, total								
Arsénico, total	Sal, calidad alimentaria	NM	1987		• Lista A.1 (prioridad 1) • Alimento básico • País en desarrollo		Canadá (CX/CF/ 22/15/17)	
Arsénico	Arroz descascarillado	NM (0,35 mg/Kg)	2016 (recomendado para revisión en 2020)	CdP CXC 77-2017	• Lista B • Alimento básico • País en desarrollo	La revisión del NM debe esperar que el JECFA complete la evaluación (Japón, CX/CF 22/15/17)	UE (CX/CF/22/15/17)	

Contaminante	Alimento (S)	Tipo de Norma (valor de NM/NR o N° de CdP)	Año de establecimiento	Normas correspondientes (Lista)	Criterios de priorización	Otros comentarios o información	Recomendado por (documento N°)	Voluntario
Arsénico	Arroz	CdP CXC 77-2017	2017	NMs -arsénico en arroz pulido y descascarillado	• Lista B • Alimento básico • País en desarrollo • Nueva información sobre medidas de prevención de la contaminación por arsénico en arroz (prioridad 2)	La revisión del NM debe esperar que el JECFA complete la evaluación (Japón, CX/CF 22/15/17)	UE (CX/CF/22/15/17)	
Cadmio								
Cadmio	Sal, calidad alimentaria	NM	1987		• Lista A.1 (prioridad 1) • Alimento básico • País en desarrollo		Canadá (CX/CF/ 22/15/17)	
Aflatoxina								
Aflatoxinas, total	Maíz en grano destinado a una elaboración ulterior	NM	2022		• Lista B • Alimento básico • País en desarrollo	REP22/CF15, párras. 116-128		
Aflatoxina M1	Leches	NM (0.5 µg/Kg)	2001	CdP -CXC 45-1997	• Lista A2 (prioridad 2) • Alimento básico • País en desarrollo		UE, Canadá, Kenya (CX/CF/ 22/15/17)	
Aflatoxina B1	Materias primas y piensos para animales productores de leche (CXC 45-1997)	CdP	1997	CdP -CXC 45-1997	• Lista A2 (prioridad 2) • Alimento básico • País en desarrollo		UE, Canadá, Kenya (CX/CF/ 22/15/17)	

Contaminante	Alimento (S)	Tipo de Norma (valor de NM/NR o N° de CdP)	Año de establecimiento	Normas correspondientes (Lista)	Criterios de priorización	Otros comentarios o información	Recomendado por (documento N°)	Voluntario
Fumonisinas (B1 + B2)								
Fumonisinas (B1 + B2)	Harina y Sémola de maíz	NM (2000 µg/Kg)	2014 (recomendado para reevaluación en 2017)	CdP -CXC 51-2003	• Lista B • Nuevos datos de ocurrencia disponibles (prioridad 1) - Canadá, CX/CF 22/15/17) • Alimento básico • País en desarrollo •		Kenya (CX/CF 22/15/17)	
Plomo								
Plomo	Cereales en grano	NM (0,2 mg/kg)	2001 (revisado en 2013)	n/a	• Lista B • Alimento básico • País en desarrollo		República de Corea (CX/CF 22/15/17)	
Plomo	Leche	NM	2001 (revisado en 2013)	n/a	• Lista B • Nuevos datos de ocurrencia disponibles (prioridad 1) - Canadá, CX/CF 22/15/17)			

NM: nivel máximo (expresado en mg/Kg o en µg/Kg)

CdP: código de práctica

ANNEX IV: ADDITIONAL COMMENTS ON THE PRIORITIZATION CRITERIA AND PROCESS FOR THE REVISION OF STANDARDS AND RELATED TEXTS FOR CONTAMINANTS

COMMENT	MEMBER
General criteria or Japan proposes addition of the following criterion: HBGV cannot be established: Either JECFA or other relevant joint FAO/WHO expert consultations recognized by CCCF decided not to establish HBGV due to both genotoxicity and carcinogenicity, or other toxicity that does not support establishment of a threshold for the critical effect. (1- higheset priority) (rationale) The current criterion “a new health- based guidance value (HBGV) is available” covers a contaminant for which an existing HBGV was withdrawn as a result of re-evaluation by JECFA. The same level of attention should also be given to a contaminant for which a HBGV has not been established from the 1st evaluation by JECFA. Japan proposes refinement of the general criterion “Recommended for re-evaluation” by dividing this criterion into three levels of priority rankings depending on the weight of rationales as follows: 1. For a ML/GL/COP where revew is recommended based on the agreement by CAC, 1- highest priority should be given. 2. For a ML/GL/COP where review is recommended based on the agreement by CCCF, 2- medium priority should be given. 3. For a ML/GL/COP where review is recommended by a member country and not agreed by CAC or CCCF, 3- lowest priority should be given.	**Japan**
ML Japan proposes addition of the following criterion: Availability of COP: COP(s) is(are) available for the relevant contaminant food/food group and contaminant combination, and implemented by member countries. (2- medium priority) (rationale) If the COP is developed and implemented by member countries for a certain combination of contaminant and food, their concentrations are expected to have decreased over time, which could support a lower ML. If not , the concentrations may not have changed significantly.	
In the “overall highest priority list”, standards should be listed in descending order of the numbers of prioritization criteria they meet. While this order alone does not necessarily imply the order of priority for re-evaluation, it can be used as a guide for CCCF. Whether to initiate a new work for review of a standard should be decided by CCCF on a case-by-case basis taking into account the impact on consumers’ health, fair practice of food trade, and feasibility of the work. If both the ML and COP are listed in the “overall highest priority list” for a certain contaminant/food combination, priority for re-evaluation should be given to the COP as it is more effective to make the food safer.	