CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

**Agenda Item 8** **CX/CF 18/12/8-Add.1**
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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON CONTAMINANTS IN FOODS**

**12th Session**
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# PROPOSED DRAFT REVISION OF THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF DIOXINS AND DIOXIN-LIKE PCBs IN FOOD AND FEED

*Comments submitted at Step 3 by Brazil, Canada, Cuba, Egypt, EU, Kenya, USA and AU*

## BRAZIL

~~Cooking practices~~ **Food preparation**

51. Food selection, preparation, and cooking practices can reduce exposure to dioxins and PCBs.

~~52. Dioxins and PCB levels in green vegetables can be reduced by washing and during cooking. Consequently, normal cooking processes can be expected to reduce dioxins and PCB levels in these foods.~~

~~53. Selecting low fat foods (lean cuts of meat, low fat dairy products), cooking foods and removing the fat portion of the foods during food preparation can significantly reduce dioxin and PCB levels~~

54. ~~Household~~ food preparation and cooking methods such as washing green vegetables, skinning, trimming the fat, in addition to the disposing of pan drippings and poaching/boiling liquids~~)~~ are practical approaches to reduce exposure to dioxins and PCBs ~~from fish. Although removal of fat can reduce dioxin and PCB levels significantly, such practices also reduce fat-soluble nutrients and other beneficial compounds (such as omega-3 fatty acids). Therefore, it is essential to carefully consider both risks and benefits in any public health message regarding food consumption.~~

**Risk communication**

**National or relevant food control authorities could consider sharing information on risks and benefits of consuming fat foods among stakeholders in the light of dioxin concentrations and nutrient components, considering both concerns regarding dioxin concentrations and the nutritional benefits (fat soluble and others).**

## CANADA

Canada wishes to express its appreciation to the European Union for leading the electronic Working Group (eWG) on the *Proposed Draft Revision of the Code of Practice for the prevention and reduction of dioxin and dioxin-like PCBs in food and feed*. Canada would like to express its agreement with the proposed guidance presented in Appendix I of this documento.

## CUBA

En respuesta a la carta circular CL 2018/4-CF Anteproyecto de revisión del Código de prácticas para prevenir y reducir la contaminación en alimentos y piensos por dioxinas y bifeniles policlorados (BPC) análogos a las dioxinas (CXC 62-2006), Cuba en prinicipio apoya el document.

## EGYPT

We would like to thank the electronic Working Group on this great work, and note that Egypt agrees the "Proposed draft revision of the Code of practice for the prevention and reduction of dioxins and dioxin-like PCBs in food and feed".

## EUROPEAN UNION (EU)

The European Union and its Member States (EUMS) welcome and appreciate the work on the revision of the Code of practice for the prevention and reduction of dioxins and dioxin-like PCBs in food and feed by the electronic Working Group led by the European Union.

The EUMS have following comments on the proposed draft Code of practice for the prevention and reduction of dioxin and PCB contamination in food and feed as presented in Appendix I of CX/CF 18/12/8

As regards §39: In addition to "*the purchaser and user should pay attention to*" it could be stipulated that the "the purchaser and user should request guarantees from their supplier as regards the origin and compliance with guideline levels or maximum levels.

As regards §41: the first sentence should be deleted.

As regards §42 the following sentence could be considered to be added after the first sentence: "In case of elevated levels, decontamination by e.g. use of active carbon, should be considered."

As regards §46: it is proposed to replace "fatty acid and deodorizer distillates" by "fatty acid distillates and deodistillates". "refingin" should read "refining".

As regards §69: there is no evidence that chlorine containing cleaning agents can result in additional dioxin contamination. Therefore this paragraph has to be deleted.

As regards §83: it is proposed to use the wording "informing their employees" instead of the wording "educating their employees"

As the document was only made recently available, the EUMS wish to point out that the above comments are not exhaustive and additional comments may be made at the meeting of CCCF.

**KENYA**

***GENERAL COMMENT***

We support the revision of the CoP for the prevention and reduction of dioxins and dioxin-like PCBs to include additional measures and to include the nondioxin-like PCBs. Dioxins are pervasive environmental pollutants and resistant to both physicochemical and biological degradation decompose very slowly and remain in the environmental for a long time because of their chemical stability. Once dioxin entered in biological organisms including humans, it accumulate in the fat tissues affects number of organs and systems.

The COD of practice will include GAP,GAF ( good animal feeding Practice)and GMP, will give guidelines levels for dioxin in soil and water ,avoid areas with increased dioxin contaminants due to local emission for grazing for production of feed crops; identified possible feed and control critical feed manufacturing process such as artificial drying heat.

**UNITED STATES OF AMERICA (USA)**

The U.S. appreciates the work that the European Union has done in preparing the draft revision of the Code of Practice and supports the draft revision of the Code of Practice and advancement in the Step process.

**AFRICAN UNION (AU)**

**Position:** African Union supports the revision of the CoP for the prevention and reduction of dioxins and dioxin-like PCBs to include additional measures and to include the nondioxin-like PCBs.

**Issue & Rationale:** Polychlorinated biphenyls (PCBs) are widespread persistent environmental pollutants. They are members of the group known as Persistent Organic Pollutants (POPs) due to their long term survival in the environment. They have a wide range of adverse health effects including endocrine disruption, dermal toxicity and chloracne, and neurocognitive development problems in children. They are classified as human carcinogens (Group 1) by the International Agency for Research on Cancer (IARC). Other than occupational exposure, exposure is mainly via food (90%), especially meat, dairy, fish and shellfish where they accumulate in the lipid components. Cereals, fruits and vegetables contain only low levels, whereas infants are exposed via breast milk.

The PCBs are chemically stable aromatic chlorinated hydrocarbons previously manufactured for their many industrial applications. The chlorination of the parent compound, biphenyl, can produce a total of 209 congeners, ranging from singly chlorinated to fully chlorinated structures. Although PCBs as a group are classified as POPs, some of the less substituted compounds exhibit a degree of biodegradation. Stereochemically, the PCBs fall into two distinct groups, namely those in which rotation around the bond linking the two phenyl rings of the parent structure occurs and those in which this rotation is hindered by the pattern of chlorine substitution. The former congeners are able to form a planar structure like polychlorinated dibenzo-*p*-dioxins (PCDDs) and act toxicologically as PCDDs and are hence termed dioxin-like PCBs. The congeners that are unable to form the planar structure akin to PCDDs form a group termed nondioxin-like PCBs. The 57$^{th}$ JECFA established a joint provisional maximum tolerable monthly intake (PMTMI) of 70 pg/kg body weight for dioxins, furans and dioxin-like PCBs. Exposures were widely found to be near or over this level. The 80$^{th}$ JECFA evaluated the nondioxin-like PCBs and concluded that based on Margin of Exposure (MoE) estimates, exposure for adults and children were unlikely to be a health concern. For breast-fed infants, the MoEs were lower (greater exposure), but considered not sufficient to outweigh the benefits of breast feeding.