



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

**13th Session
Yogyakarta, Indonesia, 29 April – 3 May 2019**

**DISCUSSION PAPER ON THE DEVELOPMENT OF A CODE OF PRACTICE FOR THE PREVENTION
AND REDUCTION OF CADMIUM CONTAMINATION IN COCOA**

Comments submitted by European Union, Switzerland, United States of America

European Union

The EUMS support the development of the code of practice because sufficient information on mitigation measures is available for field production and post-harvest processes.

The EUMS would like to comment on the suggested option under paragraph 7 of the project document of requesting new work by JECFA for developing a new risk analysis based on the tolerable weekly intake of cadmium in chocolate and cocoa derived products. The EUMS question the usefulness of such request, as this should only be considered when new toxicological data have become available.

Switzerland

Switzerland appreciates the work of the electronic Working Group (EWG) chaired by Peru on the discussion paper on the development of a code of practice for the prevention and reduction of cadmium contamination in cocoa. Switzerland supports the development of a code of practice, as several practices for the prevention and reduction of cadmium contamination in cocoa have been collected and reported by the EWG.

United States of America

- The United States supports development of a Code of Practice for the Prevention and Reduction of Cadmium Contamination in Cocoa and agrees with the EWG recommendations in the discussion paper (paragraph 14).
- The United States provides the following comments on the Project Document:
 - Section 2. Relevance and timeliness
 - Third paragraph should include JECFA's conclusion that intake of cadmium from cocoa and cocoa-derived products is not a health concern.
 - Last paragraph: CCCF establishing MLs for cadmium in chocolate and cocoa-derived products should be cited instead of EU regulations.
 - Section 4. General criterion
 - Remove the phrase "to levels that are safe for human beings."
 - Section 6. Information on the relationship between the proposal and other existing Codex documents
 - Current work on the development of MLs for cadmium in chocolate and cocoa-derived products should be mentioned in this section.
 - Section 7. Identification of any requirement for and availability of expert scientific advice
 - JECFA77 concluded that intake of cadmium from cocoa and cocoa-derived products is not a health concern. Therefore, a new evaluation by JECFA is not needed.