

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 11

CRD37

ORIGINAL LANGUAGE

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

13<sup>th</sup> Session

Yogyakarta, Indonesia, 29 April – 3 May 2019

### Comments of the International Chewing Gum Association (ICGA)

#### AGENDA ITEM 11 – DISCUSSION PAPER ON THE ESTABLISHMENT OF NEW MAXIMUM LEVELS FOR LEAD IN COMMODITIES ACCORDING TO A PPRIORITAZION APPROACH

On behalf of all its member companies, the International Chewing Gum Association (ICGA) would like to thank Brazil and other countries party to the electronic working group which has worked out the prioritization criteria for future elaboration of maximum levels of lead in further food categories, as reflected in CCCF13's working document CX/CF 19/13/9 under agenda item 11.

ICGA would like to draw the attention of the Committee that the basis for the work performed by that electronic working group has been to look at consumption and chemical occurrence data primarily reported in WHO's GEMS/Food consumption database. We also note that such database is not detailed enough to approach the proposed new work in a refined manner. Indeed, the entry "Sugar confectionary and cocoa products" in the WHO GEMMS/Foods does not provide sufficiently refined dataset on the daily consumption patterns of subcategories, such as chewing gum. We believe that the WHO GEMMS/Foods should be further worked out itself to follow the food categorization system set in the Codex GSFA standard.

As such and at present, the WHO GEMMS /Foods database overestimates dramatically the contribution of chewing gum to dietary exposures to chemicals, including lead, which may be present at very low concentration levels on chewing gum products. Chewing gum products are highly regulated products, and almost all its compositional ingredients (e.g. additives, flavorings, sugars, etc.) are subject to specifications which are all setting at Codex Alimentarius and at national levels limits for lead in those ingredients.

ICGA is of the view, based on published data in the scientific literature, that chewing gum does not contribute any significantly to the dietary exposure to chemicals such as lead.

As such, ICGA submits that chewing gum should be specifically excluded from the reference to "Sugar confectionery" in that context.

Besides, it should be noted that customs data on "sugar confectionery" do not reflect properly a large part of chewing gum products as most of the internationally chewing gum traded products do not contain sugars any longer and therefore they do not fall in that customs code category nor trade statistics.

As such, ICGA requests the Committee to consider at its present 13<sup>th</sup> session, to exclude chewing gum from the "sugar confectionery category", in the context of the proposed new work on new MLs for Lead.

As such in paragraph 22 CCCF13's working document CX/CF 19/13/9, the entry "d. Sugars and confectionary, excluding cocoa" should rather read: "d. Sugars and confectionary, excluding cocoa **and chewing gum**". If such an approach is agreeable to the Committee, then a consequential change shall be made under Section 9 of the appended Project Document under "Work Package n°2", item j. to read: "j. Sugars and confectionary, excluding cocoa **and chewing gum**".

ICGA, as the unique trade association representing the chewing gum industry and its supply chain in the Codex Alimentarius Commission and its subsidiary bodies such as CCCF, and ICGA remains ready to provide more detailed information about chewing gum consumption patterns in major market countries and also contribute further to the work of the CCCF overall in the future.