

# codex alimentarius commission



FOOD AND AGRICULTURE  
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Agenda Item 11

CX/CF 07/1/14 Add.1  
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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

First Session  
Beijing, China, 16 - 20 April 2007

### PROPOSED DRAFT CODE OF PRACTICE FOR THE REDUCTION OF 3- MONOCHLOROPROPANE-1,2-DIOL (3-MCPD) DURING THE PRODUCTION OF ACID- HYDROLYSED VEGETABLE PROTEINS (ACID-HVPs) AND PRODUCTS THAT CONTAIN ACID-HVPs (N09-2005)

Comments at step 3 submitted by Japan and AIIBP/FAIBP

#### JAPAN

Japan greatly appreciates the efforts of the United Kingdom in preparing the proposed draft Code of Practice. As a member of the working group, Japan had submitted comments and information. We would like to provide some comments which we would like to be reflected in the draft Code of Practice.

#### Paragraph 7 sub paragraph i)

The last sentence may give rise to some misunderstanding among readers that no detection of 3-MCPD is a reflection of the application of reduction measures. Therefore, we consider that it should be deleted at this stage.

As we think that it is premature to agree on conclusion, the following points should be considered:

- The SCOOP data consists of many analyses of which the limit of quantification (0.006 – 5 mg/kg) varies with most of them being 0.02 mg/kg or higher. The limit of quantification should have been lower in order to consider the actual concentration of 3-MCPD in products.
- No consideration is given to raw materials and production methods of the products tested. In order to consider appropriate code of practice, these factors should also be considered.
- The Japanese surveillance data shows that while the concentrations of 3-MCPD in 93 of 104 samples of traditionally fermented soy sauce were less than the limit of quantification (0.004 mg/kg), those in 119 of 120 samples of soy sauce prepared using acid-HVPs from well-controlled production processes to minimize 3-MCPD or other processes were higher than 0.004 mg/kg. The Japanese data clearly shows that almost all soy sauces made with acid-HVP may contain quantifiable concentrations of 3-MCPD, despite the efforts to minimize 3-MCPD.

Annex Paragraph 12

For consideration, we would like to offer the following new information about production methods of acid-HVPs:

- Time of hydrolyzation can be up to 35 hours;
- Time of neutralization of hydrolysate can be up to 900 minutes; and
- The products can be stored as a liquid with 30 to 50 % dry matter.

Annex Paragraph 14

Japan submitted some detailed information about commercial-scale measures for the reduction of 3-MCPD which have been adopted in Japan. However, this draft Code of Practice only deals with the information available in the public domain and some parameters (pH, temperature and time) detailed in paragraph 15 and 16 are different from those in Japan. We propose that in order to avoid misleading, it should be stressed in the Code of Practice that the information in paragraphs 15 and 16 is advice of general nature.

Annex Paragraph 21

The phrase “an international survey” in the last sentence should be replaced with “a Japanese survey” because this survey was conducted on domestic products in Japan.

**AIIBP/FAIBP**

AIIBP was listed as a member of the electronical working group in the last session of the Codex Committee on Contaminants in Foods in The Hague on 24-28 April 2006, but has not been mentioned as a member of the working group in the document CX/CF 07/1/14, although comments were given by e-mail of 20 November 2006. These comments reflect the experience of the European producers of acid-hydrolysed vegetable protein in respect of reducing 3-MCPD in the product. In general, we would like to point out that it would be fair to state, that producers in Europe control the 3-MCPD formation and reduction making their products completely food safe and that their knowledge is a part of this document. Moreover, it would be interesting to mention already in the introduction (rev. 2) that high levels of 3-MCPD are also found in breast milk (naturally occurring or formed in the stomach, according to Prof. Velisek who originally discovered chloropropanoles in acid-HVP) and that HVP, produced enzymatically, may form 3-MCPD during storage.

Further remarks:

- In § 14 some parts are more personal views or opinions from the author and give the impression that more information should be released. This does not belong to the Code of Practice which already concludes that there is no single route to lowering 3-MCPD. We suggest the following text:

§ 14

Manufacturers should consider the three options below and decide which are most suitable for their method of acid-HVP production. The three approaches are detailed in the following paragraphs, with specific examples given. [These approaches are based on a limited amount of information that is available in the public domain; therefore, it has not been possible to provide a full account of how to manufacture low 3-MCPD acid-HVP]. The information that follows is general advice, which [may] needs to be adapted to suit the individual needs of manufacturers. [Any further information on the production of low 3-MCPD acid-HVP would be very welcome.]

- In § 16 sodium carbonate should not be mentioned, since it cannot be used given its lower neutralization impact and its solubility at the given PH 9 to 13.

We would very much appreciate if you take these remarks into account which are based on the knowledge of the European producers of HVP, who have already all the knowledge the draft Code of Practice shall give.