

**European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
11th Session**

Rio de Janeiro, Brazil, 3 – 7 April 2017

Agenda Item 5

Proposed draft and draft maximum levels for lead in selected fruits and vegetables (fresh and processed) and other selected food categories in the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) (at Steps 7 and 4)
(CL 2017/23 CF)

*European Union Competence
European Union Vote*

The European Union (EU) welcomes and appreciates the work on the revision of the maximum levels for lead by the electronic Working Group led by the United States of America.

In general, the EU considers that the MLs should be lowered wherever possible. In addition, the EU would like to see a reduction of the number of very specific entries in the GSCTFF.

As regards the proposed actions for the individual commodities, the EU would like to present the following position:

For **juices and nectars from berries and other small fruits**, the EU considers that the ML should not be lowered to 0.03 mg/kg but remain at 0.05 mg/kg. As regards the label of this category, the EU considers that in line with REP 15/CF adopted by CAC38, it should be referred to as "*Fruit juices **EXCLUSIVELY** from berries and other small fruits*". This should also be reflected in the exclusion for "*Fruit juices*".

For **preserved tomatoes and processed tomato concentrates**, the EU agrees with the proposed approach.

For **jams (fruit preserves) and jellies**, the EU agrees to revise the ML for jams & jellies to 0.2 mg/kg. If no agreement could be reached on an ML of 0.2 mg/kg, the EU would prefer to revoke the current ML of 1.0 mg/kg for this commodity as it is inconsistent with other MLs for lead in the GSCTFF. If this entry is maintained, the EU considers that in line with REP 16/CAC, para 74, it should be referred to as "*Jams, jellies AND MARMELADES*".

For **mango chutney**: in view of reducing the number of very specific entries and taking into account the limited availability of data, the EU considers it would be preferable to combine "mango chutney" with "jams (fruit preserves) and jellies". In case the ML for jams & jellies would be revoked, the same logic should be applied to mango chutney.

For **canned chestnut and chestnut puree**, the EU considers that it would be preferable to combine this entry with "canned fruits" at 0.1 mg/kg. In case no such agreement could be reached, the EU would prefer to revoke the current ML of 1.0 mg/kg for canned chestnut and chestnut puree as it is inconsistent with other MLs for lead in the GSCTFF.

For **canned brassica vegetables**, the EU agrees to extend the current ML of 0.1 mg/kg in canned vegetables to canned brassica vegetables.

For **fungi and mushrooms**: the EU regrets that the available data have not permitted a further subdivision within this group. The EU considers the proposed ML of 0.6 mg/kg too high for a number of the most frequently consumed mushrooms in Europe such as the common mushroom (or *Agaricus bisporus*), the oyster mushroom (or *Pleurotus ostreatus*) and the shiitake mushroom (or *Lentinula edodes*). For these mushrooms, the EU considers that sufficient data are available for each of those to justify the ML of 0.3 mg/kg applicable in the EU. In case no further subdivision would be possible, the EU would prefer not to establish a generic ML for lead for all fungi and mushrooms.

For **pulses**, the EU considers that the ML for pulses can be lowered from 0.2 mg/kg to 0.1 mg/kg.

For **fish**, the EU can agree to maintain the ML for lead in fish at 0.3 mg/kg.

Finally, the EU considers that the ML for lead in canned vegetables is applicable to kale. The EU also sees no need for the development of a concentration factor for dried fungi and mushroom.