ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 19th SESSION OF THE CODEX COMMITTEE ON CONTAMINANTS IN FOODS (CCCF19)

Prepared to Support the Participation of Codex Communities of Practice Supported by GFoRSS

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Disclaimer and Disclosure of Interest

It is important to note that the proposed analysis and associated conclusions and recommendations stem from the work of regional expert working groups. The analysis and associated recommendations or positions are presented as mere suggestions and should not be considered as a direction or final recommendation to the competent authority empowered to develop and endorse Codex positions.

Disclosure of Interest: *Some experts involved in the development of this analysis contribute to various food safety and nutrition regulatory capacity building initiatives funded by other Governments, aid agencies, industry and international organizations.*

OBJECTIVES

This document offers an analysis of priority agenda items to support participation in the 19th **session of the Codex Committee on Contaminants in Food (CCCF19)**, taking place in Cairo, Egypt, from **19 to 23, 2026**.

This document is intended for potential use by the Codex communities of practice promoted by the Global Food Regulatory Science Society (GFoRSS), as part of its contribution to the Arab Codex Initiative. This capacity-building effort seeks to enhance awareness, strengthen technical preparedness, and support effective and informed participation of representatives from Arab and CCNE Member Countries and Observers in international standard-setting processes, including Codex meetings.

This document provides an analysis of selected priority agenda items, identified through a scoring methodology applied by Arab and CCNE Member Countries, with the objective of supporting the development of national and regional positions. The analysis is indicative in nature and is intended for informational purposes only; it does not constitute, nor should it be interpreted as, an official position of the partner organizations, their memberships, or their management.

The analysis presented in this document provides a factual review of key agenda items of CCCF19, pertaining to:

Agenda Item 5.1: Code of practice for the prevention and reduction of cadmium contamination in foods (at step 4)

Agenda item 7.1: Code of practice for the reduction of Aflatoxin B1 in raw materials and supplemental feedingstuffs for milk-producing animals (CXC 45-1997) (revision) (at Step 4)

Agenda item 8.1: Code of practice for weed control to prevent and reduce pyrrolizidine alkaloid contamination in food and feed (CXC 74-2014) (revision) (at Step 4)

Agenda Item 9.1: Discussion paper - Review of the ML for methylmercury in tuna and the associated sampling plan

Agenda Item 10: Proposal for a JECFA call for data on total aflatoxins in cereals and cereal based foods

Agenda Item 12.1: Discussion paper - Development of a Code of practice for the prevention and reduction of ochratoxin A contamination in dried fruits

Agenda Item 14.1: Discussion paper - Development of guidelines on the safe use of recycled plastics in food packaging

Agenda Item 15: Discussion paper - Application of maximum levels to spice mixtures

Agenda Item 5: Code of Practice for the Prevention and Reduction of Cadmium Contamination in Foods

Document number: CX/CF 26/19/5

Status in Codex process: Step 4

Background

Committee / Year	Background and development of the work
CCCF17 – 2024	Agreed to establish an Electronic Working Group (EWG), chaired by the United States of America (USA), to develop a Code of Practice for the Prevention and Reduction of Cadmium Contamination in Foods for consideration by CCCF18. The scope was intended to cover scientifically supported measures to prevent or reduce cadmium contamination across relevant aspects of food production, including agricultural and aquacultural practices, source-directed measures addressing cadmium in soil and water, drinking water, food ingredients and processing, and food packaging and storage materials. The work builds on previous Codex work on cadmium, particularly CXC 81-2022 on cadmium contamination in cocoa beans.
CAC47 – 2024	Approved the new work, with completion expected in 2027.
CCCF18 – 2025	Reviewed the draft CoP and agreed to return it to Step 2/3 for redrafting and circulation for comments, with the intention of advancing it to Step 5 at CCCF19, based on available data and information.
CCCF18 – Further development of the CoP	Agreed to further develop the general provisions taking into account discussions and written comments submitted during CCCF18, and to further develop the annexes on rice and seaweed. Additional commodity-specific annexes could also be developed where specific mitigation measures are identified that are not adequately covered by the general provisions applicable to all foods.
CCCF18 – Request for additional information	Requested the Codex Secretariat to issue a Circular Letter seeking information on general and commodity-specific mitigation measures, including for cereals and cereal products (e.g., wheat and its derivatives and maize), vegetables including leafy vegetables, pulses and legumes, fruits, and shellfish.
CCCF18 – Integration of CXC 81-2022	Agreed that the Code of Practice for the Prevention and Reduction of Cadmium Contamination in Cocoa Beans (CXC 81-2022) should be integrated into the broader CoP once the general provisions applicable to all foods are completed or near completion.
Work towards CCCF19 – 2025–2026	The EWG continued development of the general provisions and the rice and seaweed annexes, taking into account CCCF18 discussions, written comments and additional information received. The work also considers whether available evidence supports additional commodity-specific guidance and how CXC 81-2022 should ultimately be incorporated into the broader Code.
CCCF19 – 2026	CCCF19 will consider the revised draft CoP at Step 4, including the completeness and practical applicability of the general provisions and the rice and seaweed annexes, the need for any additional commodity-specific provisions, and the future integration of CXC 81-2022 into the broader Code.
	The EWG proposes that CCCF19 consider: (1) whether the general provisions and the rice and seaweed annexes are sufficiently complete, and identify any additional issues requiring further work; (2) whether to not proceed, at this stage, with additional commodity-specific annexes, given the information currently available; (3) the future integration of CXC 81-2022 on cocoa beans into the broader Code, while determining whether cocoa-specific mitigation measures should be retained separately and without reopening the agreed technical content of CXC 81-2022; (4) alignment of definitions, where applicable, with terminology used in existing Codex standards and relevant international references; and (5) continuation/re-establishment of the EWG to finalize the general Code and annexes, integrate CXC 81-2022 and submit a revised document to CCCF20 (2027) for further advancement in the Codex Step Procedure.

Analysis

Key Points of Discussion

1. The general CoP and annexes (rice and seaweed) were further developed considering comments and new information on mitigation practices.
2. Information to support development of additional annexes was not received in response to CL 2025/66-CF, and therefore no additional annexes were developed.
3. One Member requested details regarding the integration of the Code of practice for the prevention and reduction of cadmium contamination in cocoa beans (CXC 81-2022) and the timeline for doing so. Per discussions at CCCF18, CXC 81-2022 will be integrated into the current CoP, "when the general provisions applicable to all foods in the main body of the CoP are completed or near completion."
4. Two Members suggested aligning the definitions in the CoP with language used in existing Codex standards and related international references to improve consistency. Another Member suggested changing the definitions integrated from CXC 81-2022. The EWG concluded that where applicable, definitions in the CoP should conform with language used in existing Codex standards and related international references; discussion of definitions from CXC 81-2002 can be addressed by the EWG following CCCF19, while keeping in mind the general agreement that discussion on CXC 81-2022 would not be reopened.
5. One Observer requested a restructuring of the document around a prioritized control framework based on the relative risk of potential sources and mitigation effectiveness to enable operationalization. The EWG did not make this change because this draft is structured like other Codex CoPs, including Code of practice on good animal feeding (CXC 54-2004), the Code of practice for the prevention and reduction of arsenic contamination in rice (CXC 77-2017), the Code of practice for the reduction of 3-monochloropropane-1,2-diol esters (3-MCPDEs) and glycidyl esters (GEs) in refined oils and food products made with refined oils (CXC 79-2019), Code of practice for the prevention and reduction of cadmium contamination in cocoa beans (CXC 81-2022), and the Code of practice for the prevention or reduction of ciguatera poisoning (CXC 83-2024).
6. One Member Organization noted that differences in bioavailability could affect cadmium uptake by humans. This is an issue that has been raised in the EWG previously, as the bioavailability of cadmium to humans consuming crops and terrestrial and aquatic species is an active and ongoing area of research. However, the purpose of the CoP is to identify practical cadmium mitigation methods. Also, bioavailability is not considered in JECFA risk assessments (JECFA73 2011; JECFA91 2021), which form the foundation for these mitigation effort

Recommendations

Considering the above analysis for Agenda Item 5, the following recommendations may guide the regional coordination and engagement at CCCF19:

- **Support** further advancement of the revised Code, while ensuring that the general provisions are applicable to the production systems and environmental conditions of CCNE countries.
- **Assess** the regional relevance of the proposed rice and seaweed annexes and identify whether CCNE countries have available occurrence data or practical experience with cadmium mitigation measures for these commodities.
- **Maintain** the possibility of developing additional commodity-specific annexes. The current lack of sufficient information should not be interpreted as demonstrating that no additional annexes are needed. CCNE countries could identify commodities of particular regional importance for which cadmium contamination and specific mitigation measures may warrant future consideration.
- **Identify** and share available national data on cadmium occurrence and sources of contamination, particularly information related to soil characteristics, irrigation water, fertilizers and soil amendments, agricultural practices and relevant food commodities.
- **Ensure** that mitigation measures remain applicable under CCNE production conditions, particularly in arid and semi-arid environments, where irrigation-water quality, soil characteristics and agricultural inputs may influence cadmium occurrence and uptake by crops.
- **Support** the integration of CXC 81-2022 on cocoa beans into the broader Code, while preserving commodity-specific measures that remain relevant and avoiding unnecessary reopening of already agreed technical provisions.

- **support** re-establishing the EWG and submitting the revised integrated document to CCCF20 (2027).

Overall, the region may support advancing the revised Code of Practice through the Codex Step Procedure, while taking into account the technical considerations identified above and ensuring that the outstanding issues are appropriately addressed.

Agenda Item 7: Code of Practice (CoP) for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feedingstuffs for Milk-Producing Animals

Document Number: CX/CF 26/19/7

Status in Codex process: Step 4

Background

Key points: The work aims to revise CXC 45-1997, a Code developed more than 25 years ago, in order to reflect current knowledge and strengthen measures for reducing aflatoxin B1 (AFB1) in feed for milk-producing animals and, consequently, aflatoxin M1 (AFM1) in milk. AFB1 present in feed is metabolized by milk-producing animals into AFM1 and transferred to milk. The revised approach therefore places greater emphasis on prevention and control throughout the feed chain, including production, harvesting, storage, feeding, monitoring and management of contaminated feed.

The 16th Session of the Codex Committee on Contaminants in Foods (CCCF16, 2023) agreed to establish an Electronic Working Group (EWG), chaired by Canada, to develop a discussion paper on the review of the Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feeding stuffs for Milk-Producing Animals (CXC 45-1997), based on the following prioritization criteria for the review of Codex standards and related texts for contaminants in food and feed:

- inclusion in List A.1 (more than 25 years old);
- aflatoxin M1 being a genotoxic carcinogen;
- milk being a staple food consumed in developing countries; and
- the related Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CXC 51-2003) having been updated without a concurrent review of CXC 45-1997.

CCCF17 (2024) agreed to re-establish the EWG, chaired by Canada and co-chaired by Saudi Arabia, to revise the discussion paper, propose revisions to CXC 45-1997, consider how other related Codex Codes of Practice could be integrated or merged to avoid overlap, inconsistencies and redundancies, and prepare a project document for new work.

CCCF18 (2025) supported the proposed direction for changes to the technical content, structure and approach to integrating Codex texts, and agreed to forward the proposal for new work (project document) to the 48th Session of the Codex Alimentarius Commission (CAC48, 2025), which approved the new work. It also agreed to re-establish the EWG, chaired by Canada and co-chaired by Saudi Arabia, to further revise the Code of Practice for consideration by CCCF19 (2026).

CCCF19 is invited to consider the proposed revisions to the Code of practice for the reduction of aflatoxin B1 in raw materials and supplemental feedingstuffs for milk-producing animals (CXC 45-1997), as presented in Appendix I, including whether the CoP can be forwarded to CAC49 for adoption.

Analysis

Key Points of Discussion

CXC 45-1997 has been significantly expanded from its original text, which was published in 1997 and has not been revised since then. An update to the Code of Practice's title is proposed. New topics are covered, including aflatoxin management in silage and the use of mycotoxin detoxifying agents. The following sections are new or have been revised to provide more detailed information:

- Purpose and scope
- Related Codex texts
- Definitions

- General recommendations
- Pre-planting and preparation for planting
- Pre-harvest
- Harvest (non-forage crops and forage crops)
- Preparation for storage (non-forage crops)
- Storage (non-forage crops, silage stored in silos, silage stored in bales, additives in silage and hay)
- Animal feeding (silage, mycotoxin detoxifying agents and dilution/blending)
- Treatment and disposal of contaminated feed

Various EWG members recommended removing prescriptive details from the revised Code, as it should provide general and overarching information that is widely applicable to Member Countries. Member Countries also suggested clarifying how certain information on feed production relates specifically to aflatoxin management.

Mixed opinions were expressed on whether information on dilution/blending of contaminated feed should be included and, if so, what information should be provided. Guidance was sought from the CCCF Chair on whether and how the Code should address blending. The proposed revisions do not endorse blending; rather, they encourage Member Countries to seek guidance from the competent authorities, as regulations or guidance concerning blending may exist at the national level.

A subsection on traceability was considered but has not been included in the revised Code. Instead, the Code of Practice on Good Animal Feeding (CXC 54-2004), which includes provisions on traceability, and the Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System (CXG 60-2006) are referenced in the section on related Codex texts. The principles in CXG 60-2006 are currently being revised and discussed at the 28th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS28) in 2026. As part of this update, consideration is being given to whether and how feed should be included in the guidance.

The proposed revision provides a comprehensive preventive approach and allows flexibility to accommodate differences in climatic, agricultural and technical conditions among countries. Analytical methods should be fit for purpose for the relevant feed matrices. Carry-over and concentration factors, particularly those affecting the transfer of AFB1 from feed to milk and its conversion to AFM1, are important when establishing monitoring strategies, interpreting contamination levels and assessing potential consumer exposure. Screening methods may be used where appropriate, while validated methods should be applied when results are intended to support regulatory decisions.

Revised code of practice (Appendix I): Summary of the main provisions

Main area	**Key provisions of the revised Code**
1. Prevention at source	Strengthening Good Agricultural Practices (GAP) and Good Manufacturing Practices (GMP), including crop selection, soil management, water stress reduction, pest control, and prevention of fungal contamination throughout agricultural production.
2. Harvesting and storage	Improving harvesting, drying, moisture control, silage fermentation, and storage conditions to minimize Aspergillus growth and AFB1 formation. Particular attention is given to silage management and aerobic stability.
3. Risk-based monitoring and surveillance	Promoting representative sampling, validated analytical methods, and targeted monitoring of AFB1 in animal feed and AFM1 in milk, considering geographical origin, climatic conditions, seasonal variability, and contamination history.
4. Animal feed management	Strengthening controls on high-risk feed ingredients and agricultural by-products, ensuring compliance with applicable regulatory limits, and prioritizing feed with the lowest possible AFB1 contamination for lactating animals.

5. Mycotoxin detoxification agents (MDAs)	Introducing provisions for two categories of agents: Adsorbing agents (clay minerals, yeasts, activated charcoal), which bind AFB1 and reduce its gastrointestinal absorption; and biotransformation agents (microbial or enzymatic preparations), which aim to degrade mycotoxins into non-toxic metabolites. Their use must be authorized by competent authorities and comply with approved conditions. MDAs must not replace preventive measures or justify non-compliance with applicable regulatory limits, unless otherwise authorized by competent authorities.
6. Blending and dilution	Introducing provisions under which blending contaminated feed with less contaminated or uncontaminated feed may be permitted, subject to authorization by competent authorities, compliance with applicable limits, and consideration of heterogeneous contamination.
7. Management of contaminated feed	Establishing provisions for the controlled treatment, detoxification, and disposal of feed exceeding permitted aflatoxin limits, including validation of treatment effectiveness and prevention of re-entry into human and animal food chains.

Key issues requiring particular attention at CCCF19

Issue	**Main concerns and proposed considerations**
Mycotoxin detoxification agents (MDAs)	The use of MDAs should be supported by scientifically demonstrated efficacy and safety, including evidence of reduced AFB1 bioavailability and, where relevant, reduced AFM1 carry-over into milk. Their application should be restricted to authorized uses and should complement, rather than replace, preventive measures. MDAs should not be used to justify non-compliance with applicable feed safety requirements.
Blending and dilution of contaminated feed	The proposed provision allowing blending or dilution under certain regulatory conditions warrants reconsideration. Dilution reduces AFB1 concentration in the resulting mixture but does not remove or destroy the toxin. Blending feed exceeding applicable AFB1 limits with compliant or uncontaminated feed for the purpose of achieving regulatory compliance should not be supported. This practice may introduce contaminated material into otherwise compliant feed, increase the volume of feed containing AFB1, and maintain a pathway for AFM1 transfer into milk. The Code should clearly distinguish dilution from validated detoxification and prioritize prevention, segregation, appropriate treatment, and controlled disposal of non-compliant feed.

Implications for CCNE countries: Key challenges and considerations

For CCNE countries, the revised Code is relevant to both the prevention of AFB1 contamination in animal feed and the reduction of AFM1 exposure through milk and dairy products.

Its effective implementation requires consideration of regional agricultural practices, climatic conditions, feed production and storage systems, analytical capacities, and national regulatory frameworks.

The proposed detoxification options and blending/dilution provision deserves particular attention because of its implications for food safety, regulatory consistency, and the management of non-compliant feed.

Issue / challenge	**Relevance and considerations for CCNE countries**
Food safety implications of blending/dilution	Blending contaminated feed with compliant or uncontaminated feed reduces the AFB1 concentration in the resulting mixture without eliminating the toxin. It should therefore not be considered equivalent to prevention or effective detoxification. The continued presence of AFB1 may contribute to animal exposure and subsequent AFM1 contamination of milk.

Management of non-compliant feed	Blending feed exceeding applicable AFB1 limits with compliant feed to achieve regulatory compliance may undermine the effective management of non-compliant material. A regional approach prioritizing segregation, authorized and validated treatment, or controlled disposal would provide a more precautionary basis for protecting animal and public health.
AFB1–AFM1 carry-over into milk	AFB1 ingested by milk-producing animals can be metabolized into AFM1 and transferred into milk. Feed management decisions therefore have direct implications for consumer exposure. This is particularly relevant where climatic conditions, feed storage practices, or dairy production systems increase the likelihood of contamination.
Sampling and heterogeneous contamination	Aflatoxin contamination is frequently heterogeneous within feed lots. Blending introduces additional challenges for representative sampling and reliable verification of contamination levels. Appropriate sampling plans and validated analytical methods are therefore essential for effective risk management.
Analytical and official control capacities	Effective implementation requires reliable AFB1 testing in feed and AFM1 monitoring in milk.
Traceability and regulatory enforcement	Permitting blending would require robust traceability, documentation, official supervision, and verification mechanisms to prevent repeated dilution or uncontrolled redistribution of contaminated feed. Avoiding blending as a corrective measure would reduce these additional enforcement challenges.
Prevention as the primary risk-management approach	The revised Code should maintain prevention at source as the cornerstone of AFB1 risk management, through GAP/GMP, appropriate harvesting, drying, storage, and risk-based monitoring. Permitting dilution to address non-compliance could weaken incentives to prevent contamination and encourage reliance on corrective practices rather than preventive controls.
Validated treatment and detoxification options	Where technically feasible and legally authorized, scientifically validated treatment or detoxification methods may provide alternatives for managing contaminated feed. Their effectiveness, safety, and potential impact on AFM1 transfer into milk should be demonstrated. Such measures should not be confused with simple dilution or the use of feed additives that reduce toxin absorption.
Regional regulatory consistency and trade	Divergent national approaches to blending/dilution could create inconsistencies in feed safety management and complicate regional trade. Greater coordination among CCNE countries on prevention, monitoring, management of non-compliant feed, and regulatory requirements could promote consistent health protection and facilitate trade.

Recommendations

The revision of CXC 45-1997 is relevant to the CCNE region because effective control of AFB1 in feed is a key preventive measure for reducing AFM1 contamination of milk and protecting public health.

CCNE countries could support the revision in principle, particularly its emphasis on preventive measures, risk-based monitoring, improved feed management, and scientifically validated risk-reduction approaches.

However, the provision allowing blending or dilution of contaminated feed should be reconsidered, particularly where it could permit feed exceeding applicable AFB1 limits to be mixed with compliant feed for the purpose of achieving regulatory compliance.

The proposed CCNE position should therefore emphasize:

1. Prevention at source as the primary strategy for reducing AFB1 contamination.

2. Scientifically validated and authorized detoxification measures, while maintaining preventive controls and regulatory compliance as the primary option.
3. Non-acceptance of dilution as a means of achieving compliance for feed exceeding applicable AFB1 limits.
4. Appropriate management of non-compliant feed, including segregation, authorized treatment where effective, and controlled disposal.
5. Strengthened regional coordination, particularly on occurrence data, sampling, analytical capacities, official controls, and harmonized risk-management approaches.

Overall, the region could support advancing the revised Code of Practice through the Codex Step Procedure, taking the above technical considerations into account

Agenda Item 8: Revision of the Code of Practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed

Document Number: CX/CF 26/19/8

Status in Codex process: Step 4

Background

Committee / Year	Main discussions, decisions and outcomes
CCCF15- 2022	Following the JECFA evaluation of pyrrolizidine alkaloids (PAs), CCCF15 agreed to reconvene the EWG, chaired by the European Union, to prepare a discussion paper assessing the feasibility of possible follow-up actions.
CCCF16- 2023	Agreed to request comments on the recommendations presented in the discussion paper and tasked the EU-chaired EWG with preparing a revised paper for CCCF17, taking into account the comments received.
CCCF17- 2024	Agreed to further develop the proposal to revise CXC 74-2014, including specific practices for honey production; prepare a project document; and develop guidance on sampling and analytical performance characteristics to support PA occurrence-data submissions to GEMS/Food. Established an EWG chaired by Turkey and co-chaired by the United Kingdom and the Netherlands.
CCCF18- 2025	Agreed to initiate new work on revising CXC 74-2014, subject to CAC48 approval, and forwarded the project document accordingly. Included guidance on sampling and analytical performance characteristics for future GEMS/Food data calls. Re-established the EWG to revise the CoP, expanding its scope to additional foods, beekeeping, integrated weed control, food/feed establishment practices, SME feasibility, pasture management, herbal supplements and naturally occurring PAs in plants.
CAC48 - 2025	Approved the revision of CXC 74-2014 as new work for CCCF, formally authorizing development of the revised Code of Practice.
EWG CCCF19 – 2026	The EWG developed a revised CoP incorporating member comments and technical discussions, addressing the principal elements mandated by CCCF18. The draft was considered sufficiently advanced for circulation for comments at Step 3 and consideration by CCCF19.
	CCCF19 is invited to review the revised CoP, consider outstanding technical issues and determine whether the text is sufficiently developed to be forwarded to CAC50 (2027) for adoption.

Key issue for discussion at CCCF19: To determine whether the revised CoP provides a scientifically sound, comprehensive and practically feasible framework for preventing and reducing PA contamination throughout food and feed chains, while ensuring risk-based implementation adapted to different production systems, national capacities and food safety priorities.

Analysis

The Electronic Working Group (EWG), chaired by Türkiye and co-chaired by the United Kingdom and the Netherlands, developed a revised Code of Practice (CoP) for the prevention and reduction of pyrrolizidine alkaloid (PA) contamination in food and feed, as presented in Appendix I (Part A) of CX/CF 26/19/8.

The revised CoP incorporates the recommendations of CCCF18, technical discussions and comments received from EWG members. It establishes a more comprehensive, preventive and risk-based framework addressing the main sources and pathways of PA contamination throughout the food and feed chains.

The principal outcomes include an expanded scope covering additional food commodities and production systems; strengthened measures for identifying and controlling PA-containing plants; specific guidance for beekeeping, honey and pollen; improved preventive practices during harvesting, processing and food/feed manufacturing; and risk-based approaches to sampling and analytical testing.

The EWG also addressed implementation feasibility, recognizing the need to adapt preventive and control measures to national circumstances, available technical resources and the operational capacities of small-scale producers and enterprises.

The EWG concluded that the revised CoP adequately addresses the main elements mandated by CCCF18 and is sufficiently developed for circulation for comments at Step 3 and consideration by CCCF19. The EWG invited CCCF19 to review the proposed text and consider whether it could be forwarded to CAC50 (2027) for adoption.

Summary of the Main Technical Provisions Developed by the EWG

Main areas	Key information and provisions in the revised CoP
1. Scientific basis and scope	Addresses toxic 1,2-unsaturated PAs and their N-oxides. Extends preventive measures to cereals, herbs, spices, teas, honey, pollen, food supplements and animal feed.
2. Identification and monitoring	Promotes identification, mapping and monitoring of PA-containing plants, supported by scientific guidance, training and awareness programs.
3. Primary production and weed management	Introduces risk-based assessment and integrated weed management, including preventive, mechanical, chemical and biological control measures adapted to local conditions.
4. Harvesting and post-harvest controls	Recommends field inspections, selective harvesting, sorting, cleaning, segregation and measures to prevent cross-contamination.
5. Pasture and livestock management	Addresses weed control in pastures, grazing practices, animal exposure and potential transfer of PAs into milk and edible animal tissues.
6. Beekeeping and bee products	Introduces apiary-site selection, monitoring of flowering periods, hive management and risk-based surveillance of PA contamination in honey and pollen.
7. Food and feed establishments	Integrates PA hazards into prerequisite programs (PRPs) and HACCP systems where necessary, including supplier verification, traceability and raw-material controls.
8. Processing effects	Addresses PA transfer and transformation during infusion, drying, fermentation and other processing operations, including possible conversion of PA N-oxides into more toxic free-base forms.
9. Sampling and analytical testing	Recommends representative, risk-based sampling, screening approaches and validated quantitative methods, particularly LC-MS/MS, with testing frequency adapted to the level of risk and effectiveness of preventive controls.
10. Botanical food supplements	Introduces botanical identification, supplier qualification, raw-material verification and risk-based controls throughout the supply chain.
11. Consumer protection	Provides guidance on consumer awareness, wild-collected plants, vulnerable populations and measures to reduce cumulative dietary exposure.
12. Implementation and feasibility	Recognizes the need for proportionate implementation adapted to national circumstances, available resources, production systems and the capacities of small-scale operators.

Analysis of the EWG Proposal in the CCNE Regional Context

The revised Code of Practice (CXC 74-2014) provides a scientifically justified and comprehensive framework for preventing and reducing pyrrolizidine alkaloid (PA) contamination in food and feed. Its emphasis on prevention at

source, integrated weed management and risk-based controls is particularly relevant to CCNE countries, considering the importance of culinary herbs, honey, botanical products in the region.

From a regional perspective, the following technical considerations merit particular attention:

Technical aspects	Analysis and implications for CCNE countries
Regional applicability of preventive measures	The proposed integrated weed management measures are appropriate but should be adapted to regional agricultural conditions, particularly arid and semi-arid environments, extensive farming systems and variations in weed prevalence.
Identification of PA-containing plants	Effective prevention requires knowledge of PA-producing plant species and their distribution. The availability of regional identification guides, mapping systems and monitoring data may be limited, affecting the implementation of targeted control measures.
Beekeeping and honey contamination	The proposed measures for apiary location, flowering-period monitoring and hive management are relevant to regional honey production. However, their feasibility for traditional and migratory beekeeping requires consideration.
Sampling and analytical testing	The heterogeneous distribution of PAs presents challenges for representative sampling. Risk-based testing using validated methods should be encouraged, while considering laboratory capacities, analytical costs and the feasibility of implementation by SMEs.
Botanical products and food supplements	Wild-collected plants, herbal preparations and food supplements may present specific contamination risks. Botanical identification, supplier verification and traceability are important, particularly where supply chains are fragmented or insufficiently documented.
Regional scientific evidence	Regional data on PA-containing plants, priority commodities, contamination pathways and mitigation effectiveness are needed to support evidence-based implementation.

Overall Assessment and Implications for CCNE

The EWG proposal constitutes a substantial improvement to the existing CoP and addresses important contamination pathways that are relevant to the CCNE region. However, three main considerations should guide the regional assessment:

1. Scientific relevance and effectiveness: Ensure that recommended preventive and mitigation measures are supported by sufficient evidence and adapted to the contamination pathways and commodities concerned.
2. Feasibility and proportionality: Maintain flexibility in implementation, particularly for small-scale producers, beekeepers and countries with limited surveillance and analytical capacities.
3. Regional evidence generation: Encourage identification and mapping of PA-containing plants, targeted occurrence monitoring and collection of representative data for priority food and feed commodities.

Recommendations

CCNE countries could support the revision of CXC 74-2014 in principle, recognizing its scientific basis and the importance of preventing pyrrolizidine alkaloid (PA) contamination at source. The revised CoP should allow flexible, risk-based and proportionate implementation, taking into account national conditions, agricultural practices and available technical capacities.

Recommendations for regional implementation and coordination:

- Identification and monitoring: Promote regional cooperation to identify and map PA-containing plants and strengthen targeted surveillance in agricultural, pastoral and beekeeping areas.
- Regional data generation: Encourage the collection and sharing of occurrence data on PAs in priority commodities, particularly cereals, herbs, spices, honey and botanical products, including submission to GEMS/Food where appropriate.
- Sampling and analytical capacity: Strengthen regional technical cooperation on representative sampling, validated analytical methods and risk-based testing strategies.

- Implementation support: Facilitate the exchange of good practices and practical guidance adapted to regional production systems, particularly for small-scale producers and beekeepers.
- Regional coordination: Encourage CCNE countries to share scientific information, monitoring results and implementation experiences to support harmonized, evidence-based approaches to PA risk management.

Agenda item 9.1: Discussion paper: Review of the ML for methylmercury in tuna and the associated sampling plan

Document Number: CX/CF26/19/9

Background

Key points: Codex work on methylmercury in fish was initiated through the review of the pre-existing guideline levels (GLs) for methylmercury in fish established in CXS 193-1995. The work subsequently led to the establishment of the current MLs for methylmercury for four fish groups: tuna 1.2 mg/kg; alfonsino 1.5 mg/kg; marlin 1.7 mg/kg; shark 1.6 mg/kg (using ALARA approach with the rejection rate less than 5%), followed by development of a sampling plan and, more recently, reconsideration of whether the ML and sampling provisions remain appropriate in light of new data. Tuna emerged as one of the priority fish groups because of its potential to accumulate methylmercury, its contribution to dietary exposure, its widespread consumption and its importance in international trade.

Committee / Year	Main decisions and outcomes
CCCF11 – 2017	General support for establishing MLs for methylmercury in tuna. Agreed not to establish MLs for canned tuna. Agreed to continue establishing MLs for methylmercury while using total mercury for screening. Higher MLs should be accompanied by additional risk-management measures, particularly consumer advice. CCCF also concluded that MLs should be accompanied by sampling plans.
CCCF12 – 2018	Considered a tuna ML initially based on the P95 (1.1 mg/kg). Due to concerns about a 5% rejection rate and different mercury levels among tuna species, 1.2 mg/kg was agreed as a compromise ML, based on data for all tuna species and a lower rejection rate. CCCF emphasized that future ML development should use data for both methylmercury and total mercury. A general sampling plan, based largely on EU Regulation (EC) No 333/2007, was considered and forwarded to CCMAS for endorsement and technical advice.
CCMAS39 – 2018	Endorsed the performance criteria for analytical methods for methylmercury, with amendments. It did not endorse the sampling plan, as several questions concerning variability between individual fish, sampling of large fish and selection of edible portions were considered outside CCMAS's remit. The sampling plan was returned to CCCF for further consideration.
CAC41 – 2018	Adopted the Codex ML of 1.2 mg/kg for methylmercury in tuna, while noting reservations from some members. Agreed that CCCF could reconsider the ML after three years in light of additional data.
CCCF13 – 2019	A revised sampling plan was not submitted for approval because of inconsistencies with other sampling plans in CXS 193-1995 and unresolved technical questions. CCCF agreed that the re-established EWG should examine contemporary scientific literature and national monitoring data and further consider sampling issues.
EWG / Circular Letter – 2020	Additional information was requested on the distribution of total mercury and methylmercury within different parts of fish muscle, particularly tuna. Relevant studies and information from members were collected through CL 2020/52-CF.
CCCF14 – 2021	Considered available evidence addressing the unresolved sampling questions. Recognized that additional information remained necessary. Agreed to continue development of the sampling plan, including consideration of different fish weight and export-value classes, while ensuring its practical applicability.
CL 2021/90-CF – 2021	As part of the review/prioritization of Codex standards, members were invited to comment on reconsideration of the tuna ML. Three members responded, with two highlighting the availability of new occurrence data potentially relevant to the review.
CCCF15 – 2022	Agreed to further develop the sampling plan using an approach incorporating fish weight and length and requiring confirmation of practicality by members. Monetary value was excluded from the plan. Agreed to collect information on national sampling plans and mercury distribution studies and to take account of CCMAS work on the General Guidelines on Sampling. Consideration of recommendations was deferred to CCCF17 (2024). Separate work on guidance for other risk-management measures was discontinued, although relevant measures could be incorporated into the sampling plan.

CCCF17 – 2024	Agreed to forward the sampling plan to CCMAS43 for endorsement and to CAC47 for adoption.
CCMAS43 – 2024	Endorsed the sampling plan for methylmercury in fish and agreed to forward it to CAC47.
CAC47 – 2024	Adopted the sampling plan, completing the Codex process for the general sampling approach associated with the methylmercury MLs in fish.
CCCF18 – 2025	CCCF considered the possible review of the existing ML of 1.2 mg/kg for methylmercury in tuna, in light of the availability of additional occurrence data since its adoption in 2018 (*it was included in the Overall Highest Priority List (OHPL) for review, based on its previous prioritization, new occurrence data, and links with ongoing sampling work. The review should also consider the 2023 FAO/WHO assessment of risks and benefits of fish consumption).* The Committee agreed to re-establish an EWG, chaired by New Zealand, to assess whether the available data provide a sufficient scientific basis to reconsider the current ML and to examine whether the existing Codex sampling plan is adequate for tuna or whether a tuna-specific sampling approach may be warranted. The EWG was requested to report its findings and recommendations to CCCF19 (2026).
EWG proposal for consideration at CCCF19	During CCCF19, delegates will examine the EWG proposal concerning the review of the ML for methylmercury in tuna and the associated sampling plan and determine the appropriate way forward. **Key point:** CCCF19 is invited to assess member countries' commitment to a call for data in late 2029 to support a meaningful re-evaluation of the maximum level (ML) for methylmercury in tuna, or alternatively defer the decision to CCCF20 (2027) to allow more time to assess data collection feasibility. Any future call should focus exclusively on fresh and frozen tuna, taking into account the additional conditions specified in Appendix I, paragraph 26. Development of a tuna-specific sampling plan should be postponed until the data call is issued, allowing relevant sampling information to be collected simultaneously.

Analysis

The EWG review indicates that the available contemporary data are not sufficiently robust and representative to support a reassessment of the current 1.2 mg/kg ML for methylmercury in tuna. Discussions therefore focused on the additional data needed, Members' capacity to generate them, and the timeframe for collection and submission to GEMS/Food.

- ✓ Additional data are needed. Priority should be given to paired total mercury (THg) and methylmercury (MeHg) measurements in fresh and frozen tuna, as THg data alone are not sufficient for reassessing the MeHg ML.
- ✓ Data quality and representativeness are critical. Future datasets should provide, where possible, information on tuna species, geographical origin/FAO fishing area, product form, fish size/weight, analytical method, sample type and paired THg/MeHg concentrations.
- ✓ Standardized data collection would improve consistency. A common template could facilitate harmonized reporting and submission to GEMS/Food, with priority given to commercially important species and representative harvesting, consuming and importing regions.
- ✓ A 2-3 year period for data generation was considered appropriate. Broad support was expressed for a JECFA call for data in late 2029, allowing Members time to identify existing data and conduct targeted surveys. If commitments at CCCF19 are limited, they could be reassessed through a Circular Letter or at CCCF20 (2027).
- ✓ No immediate basis for a tuna-specific sampling plan was identified. The general Codex sampling plan was only recently adopted, and no new evidence currently demonstrates the need for a separate tuna-specific approach. Relevant implementation experience could nevertheless be collected during the interim period.

Main country contributions proposed for data collection

Country	Available data / proposed contribution
Brazil	Total mercury data for fresh and frozen tuna available for submission.
Canada	Could generate 100-300 paired THg/MeHg samples by 2029, with species and origin recorded where available.
Chile	Total mercury data available for submission.
Japan	Data collection by 2029 targeting Pacific bluefin, bigeye, albacore, yellowfin and Southern bluefin tuna.
New Zealand	May collect data for several commercially important tuna species during the interim period.

Republic of Korea	Methylmercury data available in 2026.
Thailand	Willing to collect and submit data; scope not yet specified.
United Kingdom	May collect data, subject to funding and resources.

Implications for CCNE countries: Key challenges and issues

For CCNE countries, the key consideration is not only the future reassessment of the 1.2 mg/kg ML for methylmercury in tuna, but also the capacity to adopt and consistently implement the existing Codex standard and associated sampling provisions.

The main challenges relate to the availability of representative national data, analytical capacity for MeHg determination, interpretation of THg screening results, identification of tuna species, implementation of representative sampling, and consideration of regional consumption and trade patterns. These issues are also directly relevant to the ability of CCNE countries to contribute meaningful data to any future Codex review.

Issue / challenge	Relevance and considerations for CCNE countries
National occurrence data	Limited national MeHg data may constrain assessment of compliance with the existing ML and understanding of its implications for regional tuna products and trade.
MeHg analytical capacity	As MeHg determination is required to confirm compliance, countries relying mainly on THg monitoring may need to assess laboratory capacity, methods and quality assurance for MeHg analysis.
THg screening and interpretation	Clear national procedures are needed to ensure that THg is used as a screening tool and that results above the MeHg ML are appropriately confirmed by MeHg analysis.
Species identification	Differences in mercury occurrence among tuna species make reliable species identification important for monitoring, interpretation and risk management.
Sampling implementation	Applying the Codex sampling plan to large and high-value tuna may present practical challenges that should be documented through national implementation experience.
Regional consumption and trade	Countries should consider the relevance of the ML in relation to locally consumed, imported and exported tuna species, as well as national consumption patterns.
Data gaps and representativeness	Limited CCNE data may mean that regional conditions are insufficiently represented in the evidence used for future Codex decisions.
Regional harmonization	Coordination on sampling, analytical methods and data reporting could facilitate consistent implementation of the existing standard and improve comparability of CCNE data.

The proposed data-generation period provides an opportunity for CCNE countries to address these implementation gaps while building a stronger regional evidence base. Priority could be given to species-specific and paired THg/MeHg data, supported by harmonized reporting and adequate information on origin, product form and fish size/weight, for future submission to GEMS/Food.

Recommendations

Recommendations for CCNE Countries Regarding the EWG Proposals

The review of the maximum level (ML) for methylmercury in tuna and the associated sampling provisions is particularly relevant to the CCNE region, considering the importance of tuna in regional consumption and trade and its potential contribution to dietary exposure to methylmercury (MeHg).

CCNE countries could support maintaining the current ML of 1.2 mg/kg pending the availability of a sufficiently robust and representative dataset, while actively contributing to the proposed data-generation process. This approach would help ensure that any future Codex decision on methylmercury in tuna and associated sampling provisions is scientifically justified and adequately reflects regional consumption patterns, trade considerations and occurrence data. In this context, the following recommendations are proposed:

1. Support the proposed data-generation process, subject to confirmation of member countries' capacity and commitment to provide representative occurrence data for a potential JECFA call in late 2029. Alternatively,

support revisiting the matter at CCCF20 (2027) to allow countries additional time to assess the feasibility of data collection.

2. Endorse the proposed scope of the future data call, focusing exclusively on fresh and frozen tuna, in accordance with the EWG recommendations, while ensuring adequate identification of tuna species, geographical origin and paired MeHg/total mercury (THg) concentrations, where available.
3. Encourage regional data generation and consolidation by identifying existing national datasets, priority tuna species, analytical capacities and information gaps, with a view to improving the geographical representativeness of data submitted to GEMS/Food.
4. Support postponement of the development of a tuna-specific sampling plan until the future mercury data call, while encouraging CCNE countries to document their experience with existing Codex sampling provisions and collect relevant information on sampling practices.
5. Promote regional coordination through a common data-collection framework, harmonized reporting requirements and cooperation among competent authorities and laboratories to facilitate the future submission of reliable and comparable regional data.

Agenda Item 10: Proposal for a JECFA Call for Data on Total Aflatoxins in Cereals and Cereal-based Foods

Document Number: CX/CF 26/19/10

Background

The 17th Session of the Codex Committee on Contaminants in Foods (CCCF17, 2024) agreed that the JECFA Secretariat should issue a call for data on total aflatoxins in cereals and cereal-based products, including foods for infants and young children.

The request responds to the need for new occurrence data collected after the adoption of the relevant maximum levels and is intended to support a future scientific and regulatory review by JECFA and CCCF.

The commodities identified for the data call include maize grain; flour, meal, semolina and flakes derived from maize; husked and polished rice; sorghum grain destined for further processing; and cereal-based foods for infants and young children.

For Bahrain, the available analytical dataset covers samples collected from 2021 to date and provides a national evidence base for assessing the occurrence of total aflatoxins in cereals and cereal-based foods available in the market or otherwise sampled by the competent authority.

The Bahrain analysis should be interpreted alongside Codex data requirements, including commodity identity, country of origin for imported foods, state of food analysed, analytical method, LOD/LOQ, result qualifiers, and sufficient sample identifiers to support data quality and representativeness.

The Codex/JECFA data request highlights the following points:

- Use data collected with methods capable of reporting results at or below 5 µg/kg where the data are intended to inform the maximum level for cereal-based foods for infants and young children.
- Differentiate samples by commodity, processing form, intended use, country of origin, and state of food analysed, including raw, cooked, milled, dried or otherwise processed states as applicable.
- Submit complete analytical metadata, including the method used, LOD, LOQ, units, treatment of results below the reporting limit, sample identifiers, and any relevant notes on sampling and laboratory quality assurance.
- Use the Bahrain results to identify data gaps, strengthen national surveillance, and support timely submission of suitable records to the GEMS/Food database or other channels specified by the JECFA Secretariat.

Analysis

Key Points of Discussion

- ✓ The Bahrain dataset, collected from 2021 to date, is relevant to the CCCF19 discussion because it can provide recent national occurrence information on total aflatoxins in cereals and cereal-based foods.
- ✓ The analytical value of the dataset depends on documenting the number and type of samples, commodity and product categories, sampling locations and periods, country of origin, analytical methods, LOD/LOQ, and the distribution of quantified and non-quantified results.
- ✓ Priority should be given to mapping Bahrain records to the Codex/JECFA commodity categories: maize and maize-derived products, husked and polished rice, sorghum destined for further processing, and cereal-based foods for infants and young children.
- ✓ Where Bahrain data include additional cereals or cereal-based products, those records may still support national risk management and regional understanding, but they should be clearly separated from the core commodity categories requested for the JECFA call.
- ✓ Interpretation should distinguish results reported as detected, not detected, or below the LOQ, and should avoid treating censored values as zero. Summary statistics should be generated using a transparent approach consistent with Codex guidance on occurrence-data analysis.
- ✓ Bahrain and other regional members may benefit from coordinated data curation so that comparable records can be combined without losing information on sample origin, processing, method performance, or the year of collection.

Summary of Bahrain analytical results (2021–September 2026)

The supplied Bahrain records were summarized by year, reporting outcome, and HPLC analysis. For this summary, non-quantified results are classified as satisfactory and quantified results are classified as unsatisfactory. The results are descriptive and should not be interpreted as a population prevalence estimate because the sampling design and coverage are not fully specified in the workbook.

Table 1. Annual summary of Bahrain total-aflatoxin records analyzed using HPLC and classified by reporting outcome

Year	Records	Satisfactory (non-quantified)	Unsatisfactory (quantified)	Maximum quantified (ppb)
2021	19	19	0	—
2022	33	33	0	—
2023	18	18	0	—
2024	21	20	1	27.34
2025	15	15	0	—
2026 (Jan–Sep)	36	36	0	—

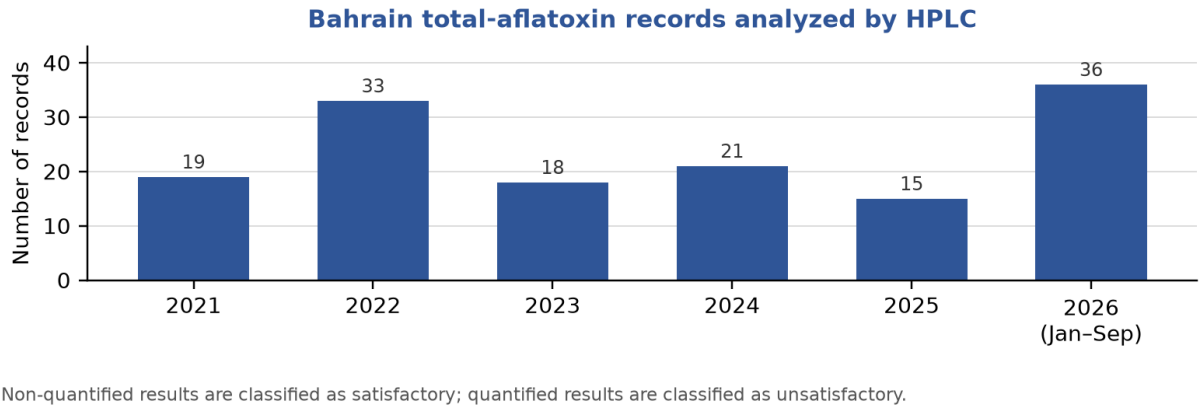


Figure 1. Annual number of Bahrain total-aflatoxin records analyzed using HPLC after excluding the maize flour quality-control sample; 2026 covers January–September.

Table 2. Quantified HPLC results in the supplied Bahrain dataset

Year	Sample / material	Method	Total aflatoxins (ppb)
2024	BROKEN RICE	HPLC	27.34

Source and interpretation: Bahrain laboratory records supplied in CEREALSSTAT.FROM2021-SEP.2026final.xlsx (142 records after excluding the maize flour test material used as a quality-control sample; January 2021–September 2026). All records are presented as analyzed using HPLC. Non-quantified results are classified as satisfactory, while quantified results are classified as unsatisfactory. "ND" and values reported below the applicable reporting limit are treated as non-quantified and are not converted to zero.

Recommendations

- ✓ Support the proposed JECFA call for data on total aflatoxins in cereals and cereal-based foods and recognize the potential value of Bahrain's national dataset collected from 2021 to date as a contribution to the evidence base.
- ✓ Prioritize the submission of recent, well-documented occurrence data that meet JECFA data-quality and analytical requirements, including clear information on commodity identification, country of origin, state of the food analyzed, analytical method, LOD/LOQ, result qualifiers and sample identification.
- ✓ Give particular attention to analytical sensitivity, especially for cereal-based foods for infants and young children. Data meeting the required LOQ, particularly an LOQ of 5 µg/kg or below for these foods, should be prioritized, while records not meeting this criterion should be transparently identified and documented.
- ✓ Ensure adequate representation of the CCNE region in the future dataset, particularly for under-represented commodities, countries, product forms, years and seasons, and for foods intended for infants and young children, given the particular vulnerability of this population group.
- ✓ Use Bahrain's 2021-to-date dataset as an initial contribution from the region, subject to verification of its completeness, analytical quality and compatibility with JECFA data-submission requirements, and encourage other CCNE countries to identify and submit comparable datasets.
- ✓ Identify remaining regional data gaps and, where necessary, address them through continued or targeted national surveillance, including gaps related to imported-product origins, relevant cereal commodities, product forms, temporal variability and foods for infants and young children.

Overall, the region may support the proposed JECFA call for data on total aflatoxins in cereals and cereal-based foods and encourage coordinated submission of recent, representative and analytically robust data from CCNE countries. Bahrain's 2021-to-date dataset could provide an initial regional contribution, subject to verification against JECFA data-submission requirements, while helping to identify remaining data gaps and priorities for future surveillance.

Agenda Item 12: Development of a Code of Practice (CoP) for the prevention and reduction of Ochratoxin A (OTA) contamination in dried fruits.

Document Number: CX/CF 26/19/12

Status in Codex process: Discussion paper

Background

The 18th Session of the Codex Committee on Contaminants in Foods (CCCF18, 2025) agreed to establish an Electronic Working Group (EWG) chaired by the Türkiye and co-chaired by United Kingdom to refine the discussion paper and the project document for the development of a Code of practice for the prevention and reduction of OTA contamination in dried fruits for consideration by CCCF19 as new work, highlighting that Codex maximum Levels (MLs) and codes of practice (CoPs) for the prevention and reduction of Ochratoxin A (OTA) contamination already existed for various food groups.

The proposed work is expected to commence following recommendation by CCCF in 2026 and approval as new work by CAC in 2027. Subject to the progress of the work, completion is anticipated by 2030.

In December 2025, EWG invited to suggest dried fruits for possible inclusion in the scope of the work and to provide relevant supporting information. In addition, with a view to facilitating the preparation of a proposed CoP, should

the work progress to that stage, members were invited to provide information on recommended practices applicable to the pre-planting, planting, pre-harvest, harvest, post-harvest, storage, packaging, and transportation stages that have been demonstrated to reduce or prevent OTA contamination, together with supporting scientific publications, studies, and relevant regional or national guidance documents.

Brazil, Cabo Verde, Ghana, and the International Nut and Dried Fruit Council (INC) provided useful information and scientific data relevant to the development of the discussion paper and project document.

To refine the discussion paper and the project document for the development of a CoP for the prevention and reduction of OTA contamination in dried fruits, a meeting was held in Türkiye in February 2026 with experts.

The first draft of the discussion paper, project document, and CoP was circulated to the EWG members in March 2026 for comments and suggestions.

Comments and suggestions were received from Argentina, Brazil, Cabo Verde, Canada, Indonesia, Japan, the United States of America, and INC.

The second draft of the discussion paper, project document, and proposed CoP was circulated to the EWG members in May 2026 for comments and suggestions.

Comments and suggestions were received from Argentina, Canada, Ghana, Indonesia, Iran, Japan, the United States of America, and INC.

CCCF19 is invited to :

- consider whether the data/information provided in the discussion paper (Appendix I) is sufficient to support new work on a Code of practice for the prevention and reduction of ochratoxin A contamination in dried fruits, and in the affirmative, to consider the points below.
- consider the project document in Appendix II and make any necessary adjustments to ensure a robust rationale for the development of the Code of practice (CoP) for the prevention and reduction of OTA contamination in dried fruits, with a view to forwarding it to CAC50 (2027) for approval as new work.
- review the outline for the proposed CoP as presented in Appendix III to guide an electronic working group (EWG) in developing the CoP following approval of new work by CAC50, in particular as to whether the structure and general content are reasonable and if further improvements could be made, e.g. addition of new sections, further development of current sections.
- establish an electronic working group to develop the CoP, for consideration by CCCF20 (2027).
- If the discussion paper needs further development, CCCF19 is invited to identify gaps and data/information in Appendix I that should be further developed for consideration of a revised discussion paper by CCCF20 (2027).

Analysis

Key Points of Discussion

1. Several members suggested expanding the scope of the proposed Code of practice to include additional dried fruits, such as dried mango, dried pineapple, and dried banana.
2. The EWG notes that the initial scope focused primarily on dried fruits predominantly produced using traditional sun-drying practices, where OTA contamination presents a greater challenge and where greater experience is available with commodity-specific prevention and reduction measures.
3. In response to members' comments, the EWG is prepared to include these additional commodities within the scope of the proposed CoP.
4. The revised discussion paper and project document are submitted for consideration by CCCF.

CONCLUSION

The revised discussion paper and project document, taking into account the comments received from members, are submitted for consideration by CCCF. The detailed comments received on the proposed CoP demonstrate the value of continuing to develop this work.

Recommendations

Considering the above analysis for Agenda Item 12, the following recommendations may guide the regional coordination & engagement at CCCF19:

- ✓ The Arab/CCNE countries strongly support the immediate approval of this new work.
- ✓ Proposed Regional Modifications: The Arab region request the incorporation of the following elements into Appendix III before it progresses:
- ✓ Section 6.3.2 (Sun-Drying Modification): Dehydration practices for specific tropical commodities require localized intervention. In many primary producing zones across the Near East, mature dates (Phoenix dactylifera) naturally shrivel, lose moisture, and drop to the ground as part of traditional cultivation techniques. This ground-collection phase exposes the fruit to extensive soil contact and dust dissemination—the primary environmental vectors for Aspergillus section Nigri spore dispersal. To bridge this critical sanitary vulnerability, The Code of Practice Adds specific protocols for low-cost dust mitigation tailored for dates that naturally drop to the ground, including the subsidized distribution of raised mesh trays or ground-covering nets.
- ✓ Section 6.3.2 (Sun-Drying Modification): Dehydration practices for specific tropical commodities require localized intervention. In many primary producing zones across the Near East, mature dates (*Phoenix dactylifera*) naturally shrivel, lose moisture, and drop to the ground as part of traditional cultivation techniques. This ground-collection phase exposes the fruit to extensive soil contact and dust dissemination—the primary environmental vectors for *Aspergillus section Nigri* spore dispersal. To bridge this critical sanitary vulnerability, The Code of Practice Adds specific protocols for low-cost dust mitigation tailored for dates that naturally drop to the ground, including the subsidized distribution of raised mesh trays or ground-covering nets.
- ✓ Confirm that, where applicable, definitions in the CoP should conform with language used in existing Codex Standards and related international references. Because different dried fruits vary considerably in their moisture retention capacities, drying kinetics, and vulnerability to fungal growth, a one-size-fits-all approach is insufficient. The guidelines should incorporate commodity-specific provisions alongside general recommendations to address the distinct physical and chemical characteristics of individual dried fruit products.
- ✓ It is critical that the Code of Practice establishes a clear distinction between the environmental conditions that support fungal proliferation and those that trigger **Ochratoxin A (OTA) biosynthesis**, given that these physiological thresholds are not necessarily identical. The guidelines must systematically account for these biological differences when developing risk-based recommendations across diverse commodities, production methods, and storage frameworks

Overall, the region could support advancing the revised Code of Practice through the Codex Step Procedure, taking the above technical considerations into account.

Agenda Item 14.1: Discussion Paper – Development of Guidelines on the Safe Use of Recycled Plastics in Food Packaging

Document: CX/CF 26/19/14

Status in Codex process: Discussion paper

Background/Context

Committee / Year	Main decisions and outcomes
CCEXEC85 – 2023	The United States of America, as Adviser to the Member for North America, introduced a proposal to explore the development of Codex guidance on food-safety considerations related to the use of recycled materials in food packaging. The proposal responded to the increasing use of recycled materials by member countries and the private sector and the potential food-safety concerns associated with their use.
CCEXEC85 / CAC46 – 2023	CCEXEC85 recommended that CAC46 request a Circular Letter (CL) to determine whether Codex members and observers considered new work on food-safety guidance for recycled materials in food packaging to be relevant, useful or necessary. CAC46 endorsed this recommendation.
CL 2024/20-CAC – 2024	The Codex Secretariat issued a Circular Letter requesting information on existing recycling guidance and views on possible Codex work. Twenty-six members, one member organization and 11 observers responded, with broad agreement on the importance of developing food-safety guidance for recycled materials used in food packaging.

CCEXEC86 – 2024	CCEXEC86 noted the interest expressed by members and observers in undertaking new work in this area, based on responses to the Circular Letter and previous discussions at CCEXEC85 and CAC46.
CAC47 – 2024	The United States informed the Commission of its intention to prepare a new-work proposal for guidance specifically addressing food-safety aspects associated with the use of recycled plastics in food packaging, for consideration by CCCF. The focus therefore evolved from recycled packaging materials generally to recycled plastics intended for food-contact applications.
CCCF18 – 2025	Recalling the general support expressed at CAC47, the United States reiterated its intention to submit a discussion paper and possible project document to CCCF19. CCCF18 also clarified that this work fell within the mandate of CCCF rather than CCFA.
CCCF18 – 2025: preparation for CCCF19	CCCF18 agreed that the United States, with assistance from Canada, the European Union, Japan and other interested members, would prepare a discussion paper on the development of guidance addressing food-safety considerations related to the use of recycled plastics in food packaging, for consideration at CCCF19.
Discussion paper for CCCF19 – 2026 (CX/CF 26/19/14)	The United States, Canada, European Union and Japan recommend that CCCF19: • Assess whether the information and evidence presented are sufficient to justify new Codex work on guidelines for the safe use of recycled plastics in food packaging. • Review and refine the project document (Appendix II), as necessary, with a view to forwarding it to CAC50 (2027) for approval as new work. • Review the proposed outline of the guidelines (Appendix III), including their structure, content and any additional sections needed, to guide subsequent drafting. • Establish an Electronic Working Group (EWG) to develop the proposed guidelines, taking into account the outline and discussions at CCCF19, for consideration by CCCF20 following approval of the new work by CAC50.

Analysis

Working process and summary

The United States prepared draft versions of the discussion paper and project document for the proposed guidelines and conducted two rounds of consultation with Japan, Canada and the European Union. The informal working group considered the format and target audience of the proposed guidelines, the existing regulatory landscape, relevant recycling processes, and the food-safety concerns associated with each recycling process.

The document includes three appendices:

Key point: The preparatory work combined a review of available information with consultation among interested members and resulted in a discussion paper, a formal proposal for new work, and a preliminary structure for the proposed Codex guidelines.

Annex	Main information presented	Key elements / findings
Appendix I : Discussion paper	Provides the technical and regulatory background relevant to the safe use of recycled plastics in food packaging.	• Information compiled mainly from available literature, responses to the Codex Circular Letter and contributions from countries participating in the informal working group. • Reviews the existing regulatory landscape. • Considers the recycling processes applicable to plastics intended for food packaging. • Identifies the food-safety concerns associated with the different recycling processes. • Considers the proposed format and intended audience of future Codex guidance. • Provides the evidence base for determining whether new Codex work is justified.
Appendix II: Project document / Proposal for new work	Presents the formal proposal for new Codex work on guidelines for the safe use of recycled plastics in food packaging.	• Provides the proposed justification for developing Codex guidelines. • Defines the proposed subject and scope of the new work. • Serves as the project document that CCCF19 is requested to review and adjust as necessary.

		• If supported by CCCF19, the project document would be forwarded to CAC50 (2027) for approval as new work.
Appendix III – Proposed outline of the guidelines	Presents the initial structure and general content envisaged for the future Codex guidelines.	• Provides a preliminary framework to guide future drafting. • Allows CCCF19 to assess whether the proposed structure and overall content are appropriate. • CCCF19 may propose additional sections or further develop existing sections. • Following approval of the new work by CAC50, the outline would guide an EWG in drafting the guidelines for consideration by CCCF20.

Implications for the CCNE Region

The proposed Codex work is relevant to the CCNE region, where countries may be at different stages in developing regulatory frameworks, recycling infrastructure and technical capacity for recycled plastics intended for food-contact applications. Future Codex guidelines could provide a common food-safety reference while allowing sufficient flexibility for implementation according to national circumstances.

Issue	Implications for CCNE
Regulatory framework	A common Codex reference could support development or strengthening of national requirements.
Source control & traceability	Effective control and separation of suitable recycling feedstock may represent an implementation challenge.
Process safety	Capacity to assess and validate decontamination processes, including challenge testing, may vary across countries.
Analytical capacity	Implementation may require adequate capacity for contaminant and migration testing.
Practical implementation	Guidance should be risk-based and sufficiently flexible to accommodate different national capacities and recycling systems.
Regional consistency	Codex guidance could support greater consistency in food-safety requirements and facilitate regional and international trade.

Key conclusions

The report identifies three principal elements supporting consideration of new Codex work: potential chemical contamination and migration from recycled plastics; significant differences between existing national regulatory approaches, and the absence of common international guidance for competent authorities.

The proposed guidelines would focus on preventive control of input materials, suitability of recycling technologies, validation of decontamination effectiveness, migration-related safety criteria and conditions of intended use.

An important point for CCCF19 is that Appendix III remains a preliminary outline, not an agreed Codex text. Its technical provisions, including migration thresholds, challenge-test requirements and additional subjects, remain open for discussion and refinement.

The document provides a basis for examining whether the proposed scope adequately addresses the principal food-safety concerns while remaining feasible for countries with different regulatory, analytical and recycling capacities.

Recommendations

CCNE countries may support the proposed new work, while emphasizing practical implementation, effective source control and traceability, validation of recycling processes, adequate analytical capacity, and flexibility to accommodate different national circumstances:

- ✓ Support the development of the proposed Codex Guidelines as new work and the establishment of an EWG, based on a science- and risk-based approach.
- ✓ Ensure that the Guidelines are practical and applicable to CCNE conditions, particularly where waste collection and sorting systems, recycling infrastructure, traceability and analytical capacities are still developing.

- ✓ Focus the technical guidance on key safety controls, including feedstock control and traceability, validation of recycling/decontamination processes, migration, functional barriers where appropriate, analytical verification and GMP. Different approaches may be needed for mechanical and chemical recycling technologies.

Practical action for CCNE

CCNE countries should be encouraged to participate in the EWG and share information on national regulations, recycling and waste-collection systems, food-contact applications and available analytical capacities, so that regional conditions and implementation constraints are adequately reflected in the future Guidelines.

Agenda Item 15: Application of Maximum Levels to Spice Mixtures

Document Number: CX/CF 26/19/15

Status in Codex Process: Step 3 / Discussion Paper & Proposed Guidance (For consideration by CCCF19).

Background

Session / Year	Main developments and decisions
CCCF17 – 2024: Initial consideration	Considered a discussion paper prepared by Brazil on establishing MLs for lead in certain food categories, including spices. Noted the absence of specific MLs for spice mixtures in CXS 193-1995 and the challenges arising from differences in ingredient composition and contamination profiles.
CCCF17 – 2024: Consultation of members	Requested comments on the application of MLs to multi-ingredient products, particularly where some ingredients have no established MLs or their proportions are unknown. Circular Letter CL 2024/03-CF was subsequently issued.
CCCF17 – 2024: Data analysis	Requested the JECFA Secretariat to analyse available GEMS/Food occurrence data on lead concentrations in spice mixtures to inform discussions at CCCF18.
CCCF18 – 2025: Review of findings	Jointly considered members' comments (CX/CF 25/18/17) and the JECFA data analysis (CX/CF 25/18/18). Noted limited support for establishing a single ML for lead in spice mixtures based solely on the available data analysis.
CCCF18 – 2025: Decision	Agreed to develop guidance specifically for spice mixtures rather than all multi-ingredient products. Established an EWG chaired by Japan and co-chaired by India, Panama and the USA to explore options for applying MLs and consider additional occurrence data.

Key issues for discussion at CCCF19: Reaching agreement on a harmonized, scientifically sound and practically applicable approach for assessing compliance with Codex maximum levels (MLs) in spice mixtures, particularly when ingredient proportions are unknown or certain ingredients lack established Codex MLs, while ensuring consistent regulatory decisions and adequate consumer health protection.

Committee / Year	The EWG recommends that CCCF19 consider the following points for discussion:
CCCF19 – 2026 (EWG proposals)	i. Confirming the scope of the guidance, including its expansion to mixtures containing culinary herbs and the treatment of seasonings and other products containing non-spice or non-herb ingredients in addition to spices and/or culinary herbs. This may include considering whether it is necessary to seek the views of CCSCH, as appropriate, on issues related to the definition and scope of mixtures of spices and culinary herbs. ii. Confirming whether the guidance is appropriately framed in a manner that is not limited to lead, while recognizing that it was developed with particular reference to lead in spices as a concrete starting point. iii. Considering whether and how the guidance should address mixtures containing one or more ingredients for which no ML has been established for the relevant contaminant, taking into account the absence of a specific approach proposed or supported by the EWG for such cases. CX/CF 26/19/15

	iv. Reviewing the results of further analysis of data on lead in spice mixtures, including newly submitted data, to be reported separately, and considering whether the outcome of such analysis has implications for the approaches described in the guidance. v. Reviewing the guidance proposed by the EWG in Appendix I, taking into account the considerations above, with a view to finalizing it at this session, and considering the appropriate status and possible placement of the guidance within the Codex framework, should it be finalized by CCCF19. vi. If further revisions to the guidance are required, re-establishing an EWG to further refine the guidance for consideration at CCCF20 (2027).

Absence of MLs for Multi-Ingredient Products: The General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995) establishes Maximum Levels (MLs) for contaminants (e.g., lead) in individual primary agricultural commodities, including ten specific spices and culinary herbs. However, CXS 193 does not contain MLs for multi-ingredient processed products, including spice mixtures.

Historical Progression in CCCF:

CCCF17 (2024): Discussion initiated following proposals for lead MLs in spices. The EWG and virtual meeting noted the lack of MLs for multi-ingredient foods.

Circular Letter CL 2024/03 CF was issued requesting member comments on guidance for multi-ingredient products. JECFA Secretariat was also requested to analyze lead occurrence data in spice mixtures from GEMS/Food (CX/CF 25/18/18).

CCCF18 (2025): Committee considered JECFA analysis and member comments. Broad support emerged for developing guidance specific to spice mixtures rather than broad multi ingredient foods, while rejecting a single generic ML for lead in spice mixtures.

An Electronic Working Group (EWG) chaired by Japan and co-chaired by India, Panama, and the USA was established. Work Process (2025–2026): The EWG (comprising 28 Member countries, 1 Member Organization, and 2 Observers) prepared two successive drafts. The scope was expanded beyond lead (Pb) to encompass other contaminants where mixture contamination originates from constituent ingredients (e.g., mycotoxins, toxic elements).

Analysis

The Electronic Working Group (EWG) prepared draft guidance aimed at harmonizing approaches for assessing compliance of spice and culinary herb mixtures with Codex maximum levels (MLs) for contaminants.

This work addresses the absence of specific MLs for lead in spice mixtures, despite the existence of MLs for certain individual spices and culinary herbs under CXS 193-1995. Differences in ingredient composition, variability in ingredient proportions and the frequent unavailability of detailed formulation information make the direct application of existing MLs to mixtures challenging.

The EWG proposes two main approaches, depending on the availability of information on ingredient proportions:

- When ingredient proportions are known: Derive a weighted reference level based on the proportions of individual ingredients and their corresponding MLs, and compare it with the measured contaminant concentration in the mixture.
- When ingredient proportions are unknown: Apply one of four screening options based on the lowest ingredient ML, the ML of the predominant ingredient, assumed equal proportions or indicative proportions derived from reliable information sources.

The draft guidance emphasizes that reference levels and screening criteria do not constitute new Codex MLs. In particular, exceeding a screening criterion should not automatically result in a determination of non-compliance; further assessment may be necessary.

Although developed primarily with reference to lead, the guidance could potentially be applied to other contaminants, including toxic elements and mycotoxins, subject to appropriate adaptations.

The EWG also recognizes methodological limitations, particularly where certain ingredients have no established MLs, ingredient proportions are estimated rather than known, or processing may affect contaminant concentrations.

Overall, the draft guidance seeks to provide competent authorities with practical compliance assessment tools while preserving their responsibility for final compliance determinations, taking into account available evidence, associated uncertainties and food safety considerations.

Summary of the Provisions Proposed in Appendix I

Proposed provisions	Main content and implementation considerations
Objective and purpose	Supplement the general principles of CXS 193-1995 with practical approaches for assessing compliance of spice and culinary herb mixtures. Lead serves as the reference contaminant, with potential application to other contaminants subject to appropriate adaptations.
Scope and product definition	Applies to dried mixtures consisting exclusively of two or more spices and/or culinary herbs. Excludes seasonings containing salt or other non-spice ingredients, as well as fresh herb mixtures.
General principles and access to information	Ingredients should comply with applicable MLs. Competent authorities may request information on ingredient composition and proportions from food business operators when necessary, while respecting commercial confidentiality.
Contamination prevention and processing effects	Emphasizes good agricultural practices (GAP), good manufacturing practices (GMP) and HACCP-based controls. Potential effects of processing on contaminant concentrations should be considered when applying the guidance.
Preliminary compliance assessment	If the measured concentration is at or below the lowest ML among the constituent ingredients, the mixture could generally be considered compliant. If it exceeds the highest ingredient ML, the mixture could generally be considered non-compliant. Intermediate concentrations may require further assessment. These interpretations remain subject to identified limitations and uncertainties.
Assessment when ingredient proportions are known	Derive a weighted reference level using ingredient proportions and their corresponding MLs, then compare it with the measured concentration. An alternative ingredient-by-ingredient attribution approach is also proposed, subject to uncertainty.
Assessment when ingredient proportions are unknown	Introduces four screening options (A–D), based on ingredient MLs and different assumptions regarding ingredient proportions.
Interpretation of screening results	A measured concentration at or below the screening criterion indicates likely compliance. Exceeding the criterion does not automatically establish non-compliance. Additional information may be requested to support further assessment.
Ingredients without established MLs	Acknowledges additional uncertainties where one or more ingredients lack an established ML for the contaminant concerned. Case-by-case assessment by competent authorities may be necessary.
Responsibility for final compliance decisions	Final compliance determinations remain the responsibility of competent authorities, taking into account applicable MLs, available information, uncertainties and relevant food safety considerations.
Illustrative examples	Provides for practical examples using lead as the reference contaminant to illustrate the proposed approaches.

Detailed Overview of the Four Screening Options When Ingredient Proportions Are Unknown

Option	Proposed approach	Conditions and limitations
Option A : Lowest ML	Apply the lowest ML among the constituent ingredients as the initial screening criterion.	A precautionary approach from a public health perspective, but potentially restrictive for certain mixtures.

Option B : Predominant ingredient	Apply the ML established for the first ingredient listed on the label.	Applicable only when it is confirmed that the first listed ingredient represents the predominant component of the mixture.
Option C : Equal proportions	Derive a mixture-specific reference level by assuming equal proportions of all listed ingredients.	A simplified assumption that may not reflect the actual formulation of the mixture.
Option D : Indicative proportions	Derive a reference level using estimated ingredient proportions based on standard recipes, published data or other recognized information sources.	Requires relevant and reliable information. Assumptions should be justified and associated uncertainties considered.

4. Key Elements for Consideration at CCCF19

The EWG proposal is structured around four main considerations:

1. Use existing ingredient-specific MLs as the basis for compliance assessment rather than establishing a single ML applicable to all spice mixtures.
2. Differentiate compliance assessment methods according to whether ingredient proportions are known or unknown.
3. Distinguish screening criteria from regulatory compliance determinations, avoiding automatic classification of a mixture as non-compliant solely because a screening criterion has been exceeded.
4. Recognize methodological limitations, particularly for mixtures containing ingredients without established MLs or where the exact composition is unavailable.

5. Technical Analysis of the EWG Proposal

The EWG proposal provides a useful framework for harmonizing the application of Codex maximum levels (MLs) to spice mixtures. The distinction between mixtures with known and unknown ingredient proportions is relevant and offers a practical starting point for competent authorities.

While the EWG proposal provides a useful framework for harmonizing the application of Codex maximum levels (MLs) to spice mixtures, several aspects require further clarification to ensure scientific consistency, practical applicability and reliable implementation by competent authorities:

1. Weighted reference-level approach: appears to be the most appropriate approach when reliable information on ingredient composition and proportions is available, provided that potential processing effects are considered.

2. Consistency of screening options: The four proposed options may produce different assessment outcomes for the same spice mixture, depending on the method applied. Without clear criteria for their selection and application, this could lead to divergent interpretations and inconsistent regulatory decisions among countries.

3. Ingredients without established MLs: The absence of Codex MLs for certain ingredients represents a significant methodological limitation, particularly when calculating reference levels or applying screening criteria.

4. Interpretation of screening results: Exceeding a screening criterion does not necessarily indicate non-compliance. Further assessment may be required, taking into account supporting information, analytical uncertainty and relevant food safety considerations.

5. Practical applicability: The absence of a clearly defined hierarchy of assessment methods and standardized decision criteria may limit consistent implementation, particularly during official and import controls. More practical examples using representative spice mixtures would help clarify the application and limitations of the proposed approaches.

Overall assessment: The proposal provides a relevant starting point, but further methodological clarification is needed to minimize divergent interpretations and ensure consistent, scientifically justified compliance assessments across competent authorities.

Recommendations

CCNE countries could support the EWG proposal in principle, recognizing the importance of developing harmonized guidance for assessing compliance of spice mixtures with Codex maximum levels (MLs). However, CCNE countries

could recommend further refinement of the draft guidance before finalization, taking into account the following considerations:

1. Consistency of assessment: The proposed screening options may lead to different assessment outcomes for the same spice mixture. Clear criteria for selecting and applying these options are therefore needed to avoid divergent interpretations and inconsistent regulatory decisions among countries.

2. Harmonization of approaches: A clear hierarchy of screening options should be established, with preference given to approaches based on reliable information on ingredient composition and proportions.

3. Ingredients without established MLs: Further guidance is needed on assessing mixtures containing ingredients for which no Codex MLs have been established.

4. Interpretation of screening results: Exceeding a screening criterion should not automatically result in a determination of non-compliance without further consideration of available evidence, analytical uncertainty and relevant food safety considerations.

5. Practical implementation: The proposed approaches should be supported by illustrative examples and practical case studies to demonstrate their consistency and applicability in official controls.

Accordingly, CCNE countries could support the continuation of the EWG's work to address these outstanding issues before finalizing the guidance, with a view to ensuring scientifically sound, practical and harmonized compliance assessments while protecting consumer health and facilitating fair international trade.