At the 37th session of the Codex Committee on Food Additives and Contaminants, the European Community expressed a reservation on the proposed maximum level for cadmium in rice. The European Community wishes to maintain its reservation, that the proposed level of 0.4 mg/kg could result in certain groups of the population exceeding safe thresholds of dietary intake for cadmium and that a lower level is achievable. Data submitted to CCFAC have shown that rice in international trade does not contain such high levels. Further details are provided below:

1. The assessment by 64th JECFA shows the impact on dietary intake by eating rice containing average levels of cadmium. This gives a limited picture as it does not address the impact on dietary intake for high level consumers who are more likely to consume products containing the higher levels of cadmium. The PTWI could be exceeded by high level consumers in regions where rice tends to contain higher levels of cadmium or brand-loyal consumers who may choose to regularly eat a brand with cadmium up to 0.4 mg/kg.

2. The report from the 61st meeting of JECFA indicates that toxic effects are possible in humans at the PTWI of 7 µg/kg body weight, with no safety margin. In view of the large contribution towards the PTWI if rice were to regularly contain levels above 0.2 mg/kg, the EC could not support a maximum level of 0.4 mg/kg. Also, if a high maximum level of 0.4 mg/kg were set this could result in more rice being grown on contaminated soils which would lead to increased dietary intake of cadmium from rice.

3. Maximum levels are set by Codex to apply to foods in international trade, as described in the Codex General Standard for Contaminants and Toxins in Food (‘Proposals for MLs in products shall be based on data from at least various countries and sources, encompassing the main production areas/ processes of those products, as far as they are engaged in international trade’). No data has been provided to indicate that rice in international trade contains cadmium up to 0.4 mg/kg. Japan appears to have a limited regional issue with some rice containing cadmium up to 0.4 mg/kg, being influenced by geological factors. It appears that such rice is not exported, in which case it should be possible to set the original proposed level of 0.2 mg/kg for rice on the basis that this level is achievable for products in international trade.