ICCO Workshop on Cd
Industry perspective on ongoing discussions to establish potential Cd limits in cocoa products
3-4 May 2012
CAOBISCO is the European Association for chocolate, biscuits and confectionery industries of Europe.

Through its National Associations CAOBISCO represents about 2000 companies in Europe.

In terms of raw materials usage we represent over 50% of world cocoa consumption, 30% of EU sugar consumption and are the major users of dairy and cereals. CAOBISCO industries are involved at all levels and with many stakeholders in working towards a sustainable cocoa economy. Our commitment covers the three pillars of sustainable development, economic, environmental and social.
The European Cocoa Association is a trade association representing the European cocoa sector and regrouping the major companies involved in the cocoa bean trade and processing, in warehousing and related logistical activities. Together, ECA Members represent over two-thirds of Europe’s cocoa beans grinding, half of Europe's industrial chocolate production and 40% of the world production of cocoa liquor, butter and powder.
EU procedure for setting maximum limits for contaminants & residues

Legislation proposed by the **EU Commission** (based on EFSA exposure assessment)

Proposal discussed in **EU contaminants working group** i.e. National Health Ministries + EU Commission Chair

**Decision** made by the **Standing Committee** on Food and Animal Chain (EU Commission & Member States at political level)

Information of All SPS national contact points (at WTO) of the newly adopted EU rules with 3 months to comment. Cocoa Producing Countries through SPS are consulted during the commenting period.
What is Cadmium?

- **Heavy metal**
- **Sources**: found in the *nature, from industrial and agricultural sources.*
- **Foodstuffs** are the main source for consumers
- **Other sources** include, eg cigarettes
- **Health risks**: retained and long lasting in the *kidney and liver* (kidney failure and cancer).

**Background: Cadmium in food**

- EFSA opinions issued as of 2009 on Cadmium in food, *including cocoa-based products* (chocolate & cocoa powder...). EFSA established a tolerable weekly intake (TWI) for cadmium of 2.5 µg/kg body weight (b.w.) in 2009.
- EU Commission takes EFSA opinions into account when taking decisions
Joint Caobisco/ECA research on Heavy Metals in cocoa

- Project: “a programme to characterize, evaluate and inform on the status of cadmium and other heavy metals in the cocoa plant and the soils it grows in”
- Duration: from March 2008 to June 2010
- Jointly funded by the The Netherlands Ministry of Agriculture, Nature and Food Quality (LNV) and Cocoa/Chocolate Industry
- Leading Research Institute: CABI, an international not-for-profit science based information and development organisation
- Partner national research institutes in origin countries
  - Detailed presentation provided by CABI, lead research institute
“Variation in uptake and partitioning of Cadmium within contrasting cocoa genotypes and methods of reducing Cadmium accumulation”

- **Background:** In other crops, Cadmium accumulation known to be affected by soil factors and variety but this information is lacking for cocoa. Breeding tree crops is a slow process but new techniques eg genetic marker assisted selection can accelerate progress.

- **Objective:** To gain a better understanding of the genetic and soil/root factors affecting Cd uptake and distribution with the cocoa plant and develop molecular tools to help breeders select varieties less likely to accumulate Cd in their seeds even when grown on Cd rich soils.

- **Approach:** controlled greenhouse studies of effect of soil conditions eg pH and nutrients on Cd-uptake and physiology of different varieties
Current status of Cadmium Maximum Residue Level (MRL) setting in final cocoa products:

- Technical discussions on a draft Regulation that contains a revision of cadmium maximum levels (amendment of Regulation (EC) No 1881/2006) including values for cocoa based products final stage - Note that Cd levels are under discussion for many foodstuffs (in order to reduce overall intake of Cd)
- Internal procedures (other Commission DG comments)
- Initially due to be voted on 27th Feb (@ Standing Committee), but vote postponed to after April 2012
Cd in cocoa: Industry position

- **Proposed workable levels for cocoa producing countries:**
  - 0.3 ppm for all chocolate with cocoa solids < 43%
  - 0.6 ppm for all chocolate and cocoa powder as consumed* with cocoa solids ≥ 43%

- **Our view on the EU Commission proposal:**
  - Suggested level is far too low (i.e. 0.1 mg/kg in milk chocolate)
  - Percentage is not in accordance with Chocolate Directive

- **EU-suggested levels will have a significant impact on:**
  - Imports of cocoa beans into the EU
  - Origin chocolate market (milk & dark) & cocoa powder
  - Organic chocolate
  - Fair trade products

* cocoa powder as consumed means cocoa powder sold (as a single product) to the final consumer.
What has industry done so far?

- **Industry** sent 2200 monitoring data entries from all cocoa producing countries to the EU

- **Industry outreach:**
  - Commissioner Dalli of DG SANCO + his services
  - Government Rep. of Health Ministries (UK, France, Italy, Spain, Belgium, The Netherlands...)
  - Issue flagged to the Cabinet of Trade Commissioner De Gucht
  - ICCO - International Cocoa Organisation
  - COPAL (Cocoa Producing Countries Alliance)

- **Support received from some EU Member States such as France and Sweden**
What can be done now?

- **by cocoa producing countries**
  - Contact various **EU Member States**
  - **Provide data** on cadmium in their cocoa beans – including data on organic and fairtrade filiere (request from the EU Commission!)
  - Contact DG Trade and other DGs (Dev, Agri…)

- **COLEACP offer to provide assistance**
  - Coordination of **data collection**
  - **Scientific assessment of the data**
  - **Submission & dialogue** with DG Health and EU member states

**Timeline:** Submit data by end of May
When discussing maximum levels for contaminants/residues in cocoa products, all parties, including the origin countries and related organisations, the industry, scientific institutes, the EU Commission and the EU Member States, should strive to set reasonable maximum levels so that both the consumer’s health and economic growth are secured.
• If you have any questions please contact:
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