

16 December 2019

## **MAC LETTER**

### **Testing for Cadmium levels in Brown Crab exported to People's Republic of China**

On 3 September 2019, at the Working Group 3 meeting on 'EU Controls and Sanitary Issues and Consumer Rules', an issue was raised by a MAC member in relation to a problem which the European exporters of live and processed brown crab are experiencing on Asian markets, including the People's Republic of China (PRC), due to a difference in application of testing live crab and crab products for levels of cadmium. Basically, the same procedure is applied in both the EU and the PRC but in the EU is carried out on the white meat (claws and appendages) while the PRC tests samples of equal amounts of white meat and brown meat (hepatopancreas). Due to the physiological make up of all crustacean species and their complex chemical process of shell-building, there are instances of cadmium levels above the current PRC standard which would be quite acceptable in the EU. Currently, EU exporters are experiencing consignments being destroyed or transported back to Europe at enormous financial loss.

Levels of contaminants, such as cadmium, have been subject to EU regulation for more than two decades and, in addition to setting maximum levels in foodstuffs, have issued detailed guidance on how such levels can be evaluated. For instance, EC Regulation No 1881/2006 specifically states cadmium levels in crustaceans are derived from crab tissue "excluding brown meat of crab" and amended by EC Regulation No. 420/2011 with more detailed direction on testing with "Crustaceans: muscle meat from appendages and abdomen ( 44 ). In case of crabs and crab-like crustaceans (Brachyura and Anomura) muscle meat from appendages.". This approach to the testing of crustacean species for cadmium levels was necessary as there was wide variation in the testing protocols giving rise to some very restrictive and disruptive market access throughout Europe. Assessing cadmium levels for the brown meat was replaced by individual countries providing consumer advice tailored to the existing exposure of the local population to such contaminants which was established by a comprehensive monitoring exercise carried out EU-wide in 2009/2010.

It is important to note that there is no evidence of environmental contamination in the areas where European brown crab is fished and no health issues for the Chinese population over and above that being experienced by European



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consumers. High levels of cadmium recorded in rice and vegetable associated with industrial pollution have made the Chinese authorities very sensitive to such contaminants but in European fisheries where such contamination does not exist there is no significant threat posed by the consumption of relatively low levels of European seafood.

Representatives of the food safety agencies in the PRC have visited the designated national laboratories in the various crab-producing countries in the EU; they are well aware that testing of contaminants is taken very seriously and carried out meticulously in such establishments.

The MAC would very much appreciate if you could liaise with your technical counterparts in the PRC on this issue to try to reach a consensus to adopting the EU approach to testing levels of cadmium in brown crab imported from EU fisheries. Adopting such an approach by the PRC would not increase the threat to their consumers.

Best regards,  
Guus Pastoor

A handwritten signature in black ink that reads 'G. Pastoor'. The signature is written in a cursive style and is positioned above a long, horizontal, slightly wavy line that serves as a decorative underline.

Chair of the Market Advisory Council