

## COMMITTEE ON TOXICITY OF CHEMICALS IN FOOD, CONSUMER PRODUCTS AND THE ENVIRONMENT

### Review of the potential risks from $\alpha$ -, $\beta$ - and $\gamma$ -hexachlorocyclohexanes in the diet of children aged 1-5 years

#### Introduction

1. A previous COT statement (COT, 2014) gave an overview of potential risks from occurrence of,  $\alpha$ -,  $\beta$ - and  $\gamma$ -hexachlorocyclohexanes (HCHs) in the infant diet. Paper TOX-2019-53 was discussed by the Committee in October 2019 and provided an updated overview, focusing on children aged 1-5 years, addressing any changes to health-based guidance values (HBGVs), as well as new exposure and toxicity data. The COT considered paper TOX-2019-55 at the October meeting and requested additional information and revisions to the tables of exposure assessment. The revised paper was circulated in advance of this meeting to allow the opportunity for Members to comment in time to draft text for the overarching addendum to be discussed later in the meeting.

#### Background

2. The chemical structures of  $\alpha$ -,  $\beta$ -, and  $\gamma$ -HCH are shown in Figure 1. Due to their lipophilic properties and persistence in the environment,  $\beta$ -HCH, and to a lesser extent,  $\alpha$ -HCH and  $\gamma$ -HCH, bioaccumulate and biomagnify in the food chain. They are distributed globally, with transfer from warmer to colder regions through evaporation and condensation (EFSA, 2005).

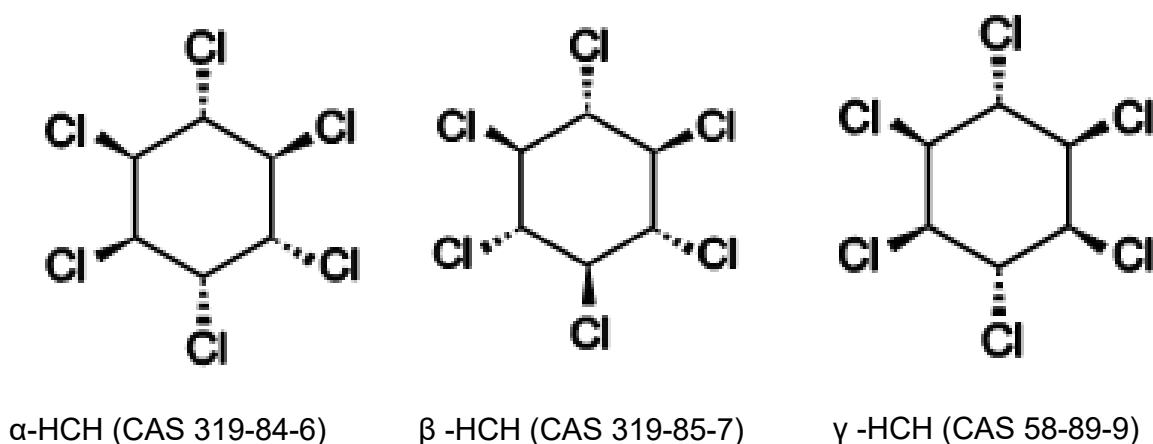


Figure 1. Chemical structures of  $\alpha$ -,  $\beta$ -, and  $\gamma$ -HCH

3. HCHs have been used as pesticides. The term “lindane” has been commonly used for HCH mixtures used as pesticides in which  $\gamma$ -HCH was >99% of total HCH, and throughout this statement the term is used only with that meaning (elsewhere “lindane”, has sometimes also been used as a synonym for  $\gamma$ -HCH).

4. Pesticidal use of products in which  $\gamma$ -HCH made up less than 99.0 % of all HCHs was banned in the EU by Council Directive 79/117/EEC of 21 December 1978. Authorisation for use of lindane as a pesticide in the EU was withdrawn by Commission Decision 2000/801/EC of 20 December 2000. This action was taken primarily because of concerns about its safety for operators, the fate and behaviour of  $\gamma$ -HCH in the environment and effects on non-target organisms.

5. The maximum levels of pesticides that are currently permitted in the EU in foods sold for infants are set out in Directive 2006/141/EC on infant formula and follow-on formula, and Directive 2006/125/EC on processed cereal foods and baby foods for infants and young children. The maximum permitted levels in other food products are described in Directive 2005/396/EC. A general maximum residue level (MRL) (0.01 mg/kg) is applicable ‘by default’ in all cases where an MRL has not been set specifically for a product or product type. This default applies to HCHs in infant and follow-on formula and in processed cereal foods and baby foods for infants and young children. As regards other food products for human consumption, several different MRLs apply depending on the HCH isomer and the food commodity in question, although for most, the default MRL applies. MRLs range from 0.004 to 0.2 mg/kg for  $\alpha$ -HCH, from 0.003 to 0.1 mg/kg for  $\beta$ -HCH, and from 0.001 to 1 mg/kg for  $\gamma$ -HCH (Directive 2013/212/EC).

## **$\gamma$ -HCH**

6. The gamma isomer ( $\gamma$ -HCH) is considered first in this statement, because more extensive toxicological data are available for the compound, and there is some scope for extrapolation to the alpha and beta isomers.

## ***Toxicity of $\gamma$ -HCH***

7. The previous COT statement discussed observations of neurotoxicity and renal toxicity in several animal studies and concluded that the mode of action of renal toxicity in rats was irrelevant to humans (COT, 2014). However, effects of paraesthesia of the face and extremities, headaches, vertigo, abnormal EEG patterns, seizures and convulsions have been reported in humans occupationally exposed to  $\gamma$ -HCH (ATSDR, 2005).

8. Other findings noted in the previous statement include immunological toxicity and endocrine disruption potential in animal studies. More recent findings have indicated altered immunological function of human lymphocytes treated with  $\gamma$ -HCH (Michałowicz *et al.*, 2013). As well as increases in luteinizing hormone and follicle stimulating hormone alongside decreased testosterone in men occupationally exposed to  $\gamma$ -HCH (ATSDR, 2005). Negative correlations ( $r = -0.500$ ) between  $\gamma$ -HCH and Insulin-like growth factor 1 levels in females has also been noted (Bapayeva *et al.*, 2016).

9. The association between lindane and endometriosis remains inconclusive and there is inconsistency in reports of  $\gamma$ -HCH's reproductive toxicity. Epidemiology studies not reported in the prior statement identified a 2.53-fold increased risk of neural tube defects compared to controls (Ren *et al.*, 2011). Also, strong negative associations were found between  $\gamma$ -HCH and sperm counts in infertile patients with reduced sperm motility, although these effects were not significant in fertile men (Khan *et al.*, 2010).

10. The COT previously agreed that  $\gamma$ -HCH is unlikely to be a human liver carcinogen and there is weak epidemiological evidence of associations between  $\gamma$ -HCH and non-Hodgkin lymphoma (NHL) (COT, 2014). However, the International Agency for Research on Cancer (IARC) stated there was sufficient evidence in humans for the carcinogenicity of  $\gamma$ -HCH for NHL after review of several studies. The IARC then categorised  $\gamma$ -HCH as "carcinogenic to humans" (Group 1) (IARC, 2015). Since the IARC evaluation, a prospective study identified a non-significant increased risk of NHL from lindane use in females (Louis *et al.*, 2017). Furthermore, the Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment (COC) concluded that  $\gamma$ -HCH does not have in vivo oestrogenic activity (COC, 2004). As for prostate cancer, only one study in the previous COT statement reported a positive exposure relationship (Mills and Yang, 2003). Since then later studies have identified significantly higher mean levels of  $\gamma$ -HCH in blood of prostate cancer patients compared to controls (Kumar *et al.*, 2010 study; Pi *et al.*, 2016).

11. With regards to genotoxicity, JMPR regarded lindane as not genotoxic (FAO/WHO, 2002) and the COT concluded that  $\gamma$ -HCH is not mutagenic (COT, 2014).

12. Differing findings on the association between  $\gamma$ -HCH and Parkinson's disease (PD) were formerly reported by COT (COT, 2014). More recently, a case control study found non-significant increased risks of PD from  $\gamma$ -HCH exposure in participants whose residence were within 0-1000m of crop cultivation. Additionally, exposure to participants in the year 1990 and onwards was found to significantly increase the risk of PD. Although, this study is not without limitations, researchers acknowledged a spatio-temporal model with lack of validation and a retrospective exposure assessment method with low specificity was used to estimate exposures (Brouwer *et al.*, 2017).

### **Health-based guidance values (HBGVs)**

13. HBGVs are presented in Table 1, the previous evaluation (COT, 2014) used the tolerable daily intake (TDI) value of 0.04  $\mu\text{g}/\text{kg}$  bw based on the LOAEL from the study by Meera *et al.* (1992).

Table 1. ADIs, TDIs and RfD proposed for  $\gamma$ -HCH.

<b>Source of HBGV</b>	<b>HBGV (<math>\mu\text{g}/\text{kg}</math> bw/day)</b>	<b>Critical effect and species NOAEL/LOAEL in mg/kg bw/day</b>	<b>Uncertainty factor</b>	<b>Study selected to derive HBGV</b>
Health Canada (1992), cited in EFSA (2005)	Group TDI 0.3 for all HCH		Unknown	Unknown
RIVM (2001)	TDI 0.04	Immunotoxicity in female rats LOAEL 0.012	300	Meera et al., 1992
JMPR (FAO/WHO, 2002)	ADI 5	Decreased survival, liver and spleen effects in rats NOAEL 0.47	100	Amyes, 1990
JMPR (FAO/WHO, 2002)	ARfD 60	Increased fore-limb grip strength and decreased grooming behaviour NOEL 6	100	
Health Canada (2010)	ADI 0.5	Decreased survival, liver and spleen effects in rats NOAEL 0.47	1000	Amyes, 1990
Integral Consulting (2011c)	RfD 0.01	Immunotoxicity in female rats LOAEL 0.012	1,000	Meera et al., 1992

## **Sources of $\gamma$ -HCH and occurrence levels**

### ***Breast Milk***

14. The previous COT statement (COT, 2014) reflects the most recent data on  $\gamma$ -HCH in human breast milk in UK populations, where  $\gamma$ -HCH was detected in breast milk at mean and maximum concentrations of 0.8 and 7.7  $\mu\text{g}/\text{kg}$  milk fat (Kalantzi *et al.*, 2004). As previously reported by the COT, 2014, levels of  $\gamma$ -HCH in UK breast milk samples have declined since it was banned in 2000. Despite no further UK

studies having been published it assumed that levels of  $\gamma$ -HCH are lower than they were in 2003.

### *Infant formula*

15. Infant formulae are included in the UK national monitoring programme for pesticide residues in food, which is overseen by the Expert Committee on Pesticide Residues in Food (PRiF). Infant formulae were last surveyed between January and February 2014 and  $\gamma$ -HCH was not detected at or above the reporting limit<sup>1</sup> of 0.01 mg/kg, i.e. the current MRL (PRiF, 2014a).

16. Recent monitoring of the wider UK food supply in July to September 2018 did not identify  $\gamma$ -HCH in retail samples of milk at or above the reporting limit of 0.002 mg/kg, indicating that levels in infant formula produced from cows' milk produced in the UK are likely to be well below 0.01 mg/kg (PRiF, 2018c). Soya milk, soya tofu and soya pieces have not been included in the UK pesticide monitoring programme since 2006, where the previous statement (COT, 2014) reported that  $\gamma$ -HCH was undetected at its reporting limit of 0.002 mg/kg and is likely to be well below 0.01 mg/kg.

17. In 2016 60% of infant food (including infant formulae) was imported to the UK is from Ireland (AHDB, 2017). The previous statement (COT, 2014) includes the most recent data on  $\gamma$ -HCH reported in a survey by the Food Safety Authority of Ireland in 2004;  $\gamma$ -HCH was not detected at a limit of quantification (LOQ) of 0.001 mg/kg for reconstituted formula. Also,  $\gamma$ -HCH was also not detected above the LOD of 0.0007 mg/kg for cows' milk in an Irish total diet study conducted during 2001-2005.

### *Complementary food*

18. Animal based infant foods containing meat, fish, eggs and cheese were last surveyed by PRiF between January and September 2014 (PRiF, 2014b).  $\gamma$ -HCH was not identified in the infant food samples at or above reporting limits of 0.01 mg/kg.

19. Cereal based infant foods were last surveyed between January and February 2013 and fruit and vegetable based infant foods were last surveyed between February and March 2013.  $\gamma$ -HCH was undetected in either of these infant foods at or above their reporting limits of 0.01 mg/kg (PRiF, 2013).

20. Recent monitoring of the wider UK food supply between January and September 2018 did not identify  $\gamma$ -HCH to be over its reporting limits ranging from 0.01 mg/kg for most commodities such as fruits, vegetables and cereals to 0.002 mg/kg in meats, milk, cheese and eggs. Collectively there were 2,329 samples for a range of commodities surveyed and  $\gamma$ -HCH did not exceed its MRL of 0.01 mg/kg in any (PRiF, 2018a, b, c).

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<sup>1</sup> The reporting limit is the lowest calibrated level employed during analysis to detect residues. The reporting limit may vary slightly from laboratory to laboratory depending on the equipment available and operating procedures used.

21. The health and safety executive (HSE) have supplied the following data from their database regarding the presence of  $\gamma$ -HCH in various foods. In 2006 one sample of chorizo from Spain and one sample salami from Switzerland  $\gamma$ -HCH was found at concentrations of 0.006 and 0.005 mg/kg respectively (HSE, 2019).

22. An EFSA report analysed pesticide occurrence data obtained from 30 reporting countries (including the UK) in 2017. The analysis included 88,247 samples from 12 food products (oranges, pears, kiwi fruits, cauliflowers, onions, carrots, potatoes, beans (dried), rye grain, husked rice grain, poultry fat and sheep fat). The results showed that  $\gamma$ -HCH was quantified below or equal to its MRL (0.01 mg/kg) in 0.59% of samples of animal origin (poultry fat and sheep). Only one sheep fat sample from Spain (accounting for 0.3% of all samples) exceeded the MRL for  $\gamma$ -HCH (EFSA, 2019).

## Exposure

### Breast Milk

23. Estimates of  $\gamma$ -HCH exposure from breast milk were based on the mean concentration (0.8  $\mu$ g/kg milk fat, 0.028  $\mu$ g/kg whole milk) from the most recent UK study (Kalantzi *et al.*, 2004). It was assumed that the fat content of breast milk was 3.5% (COT, 2014). Table 2 presents the exposure of  $\gamma$ -HCH from breast milk to children aged (12 to 15 months).

Table 2. Chronic consumption of Breastmilk and  $\gamma$ -HCH exposure to UK infants and Young children (DH, 2013)

Age group (months)	Consumption of breast milk (g/kg bw/day)		Exposure of $\gamma$ -HCH ( $\mu$ g/kg bw/day)	
	Mean	97.5 <sup>th</sup> Percentile	Mean	97.5 <sup>th</sup> Percentile
12 to 15	29	75	0.00082	0.0021
15 to 18	25	52	0.000709	0.0015

### Infant formula

24. An exposure assessment for  $\gamma$ -HCH in infant formula and cow's milk was not performed, as  $\gamma$ -HCH could not be detected at or above many of the reporting limits/LOQs described in paragraphs (15-16).

## *Complementary foods*



25. The latest pesticide residues in food report by JMPR (FAO/WHO, 2002) that included review of  $\gamma$ -HCH was published in 2015. As lindane is no longer used as a pesticide the JMPR considered monitoring data, and based on these, advised on the setting of extraneous maximum residue limits (EMRLs) and conducted dietary risk assessments. MRLs, supervised trials median residue levels (STMRs) and highest residue levels (HRs) previously estimated by the JMPR from supervised field trials in 2003, when lindane was used as a pesticide, were either maintained or lowered based on decreases in residue levels shown by the monitoring data. For example, in the case of poultry and mammalian meats, monitoring data from various European countries, India and the USA showed that residues had declined 10-fold, and therefore the JMPR recommended an EMRL 10-fold lower than the previous MRL and also reduced the STMR and HR 10-fold for use in dietary risk assessments of chronic and acute exposure, respectively. In the case of cereal grains, the JMPR recommended the EMRL be the same as the existing MRL and therefore the same STMR and HR were used in the dietary risk assessments as previously estimated by the JMPR from field trials.

26. For the GEMS/food cluster diet; G07 (which includes the UK) (WHO, 2012), JMPR estimated  $\gamma$ -HCH intakes based on estimated STMR values ranging from 0.00002 – 0.005 mg/kg (

27.

28. Table 3). Various population groups were used to estimate  $\gamma$ -HCH intakes for a range of commodities presented in (Table 3). All children aged 1-6 years were included, with the exception of “cereal grains” and “milks, raw or skimmed”. The following cereal commodities: barley, rye and triticale included populations >10 years old, 2-4 years old and 14-80 years old respectively. As for “milks, raw or skimmed” this included infants and children aged 8-20 months (FAO/WHO, 2015).

Table 3. Estimated intake values of  $\gamma$ -HCH for GEMS/food cluster diet; G07 (Adapted from FAO/WHO, 2015)

<b>Commodity</b>	<b>STMR (mg/kg)</b>	<b>Consumption (g/person/day)</b>	<b>Estimated intake (<math>\mu</math>g/person/day)</b>	<b>Estimated intake (<math>\mu</math>g/kg bw day)*</b>
Cereal grains, raw (incl processed)	0.005	345.63	1.73	0.029
MEAT FROM MAMMALS other than marine mammals, raw (incl prepared meat) -80%	0.00007	112.02	0.01	0.00017

This is a draft paper for discussion and does not reflect the views of the Committee.

as muscle				
MEAT FROM MAMMALS	0.000 5	28.01	0.01	0.000 17

other than marine mammals, raw (incl prepared meat) - 20% as fat				
Edible offal (mammalian), raw	0.000 02	15.17	0. 00	0.00
Milks, raw or skimmed (incl. dairy products)	0.000 03	388.92	0. 01	0.000 17
Poultry meat, raw (incl prepared) - 90% as muscle	0.000 6	66.38	0. 04	0.000 67
Poultry meat, raw (incl prepared) - 10% as fat	0.000 8	7. 38	0. 01	0.000 17
Eggs, raw, (incl dried)	0.000 7	25.84	0. 02	0.000 33
<b>Total intake</b>			<b>1. 8</b>	<b>0.030 7</b>

**\*Bodyweight per person = 60 kg**

29. The Food Standards Agency's (FSAs) exposure assessment team have also provided estimated  $\gamma$ -HCH intakes for the commodities listed above, using consumption data of 1.5 to 5 year olds from the National Diet and Nutrition Survey (NDNS) results (

30. Table 4). The highest dietary exposures are estimated for cereal grains, although these exposure estimates are likely to be conservative, as the STMR values used were estimated from field trials of lindane use when lindane was used as a pesticide. The JMPR recommended the same EMRL be set for  $\gamma$ -HCH in cereal grains as the existing MRL and therefore used the same STMR and HR as estimated previously from field trials in the exposure assessment. However, based on the monitoring data from European countries the JMPR concluded that at least 99.8% of residues will be below the EMRL with 99% confidence, so the STMR, which is half of the EMRL, might be an overestimate of the current average residue level in cereals.

Table 4. Estimated intake values of  $\gamma$ -HCH in children aged 1.5 to 5 years using NDNS consumption data Years 1-8 (Bates et al., 2014; Bates et al., 2016) and estimated STMR values by JMPR (FAO/WHO, 2015)

Commodity	STMR (mg/kg)	Con-sump-tion (g/kg bw/day)		Estimated intake ( $\mu$ g/kg bw/day)	
		Mean	97.5 <sup>th</sup> percentile	Mean	97.5 <sup>th</sup> percentile
Cereal grains, raw (incl processed)	0.005	4.4	8.8	0.022	0.044
MEAT FROM MAMMALS other than marine mammals, raw (incl prepared meat) - 80% as muscle	0.00007	2.5	6.7	0.00017	0.00047
MEAT FROM MAMMALS other than marine mammals, raw (incl prepared meat) - 20% as fat	0.0005	0.6	1.7	0.00031	0.00084
Edible offal (mammalian), raw	0.00002	0.7	2.0	0.000014	0.00004
Milks, raw or skimmed (incl. dairy products)	0.00003	20	55	0.0006	0.0017
Poultry meat, raw (incl prepared) - 90% as muscle	0.0006	0.9	2.9	0.00055	0.0017
Poultry meat, raw (incl prepared) - 10% as fat	0.0008	0.10	0.32	0.000081	0.00025
Eggs, raw, (incl dried)	0.0007	1.2	3.6	0.00084	0.0025
<b>Total intake</b>				<b>0.025</b>	<b>0.051</b>

### ***Risk characterisation***

31. Estimated mean and 97.5<sup>th</sup> percentile intakes for breast milk are below the TDI (0.04  $\mu$ g/kg bw) (FAO/WHO, 2002) (Table 1) and are therefore not of toxicological concern to children aged 12 to 18 months.

32. Results from a long-term dietary risk assessment performed by JMPR indicate that consumption of commodities presented in (

33.

34. Table 3) are not of toxicological concern to various population groups. The estimated daily intakes of  $\gamma$ -HCH reported by JMPR were 0 - 73% of the TDI (0.04  $\mu\text{g}/\text{kg}$ ) (FAO/WHO, 2015).

35. Results from a long-term dietary exposure assessment by EFSA expressed  $\gamma$ -HCH intakes as 4.5% and 0.002% of an ADI of 0.005 mg/kg bw/day in upper and lower bound scenarios respectively, suggesting that long-term intake of residues from food of animal and plant origin described in paragraph 21 are unlikely to be a cause for concern to European consumers (EFSA, 2019).

36. Estimated mean and 97.5<sup>th</sup> percentile intakes for all commodities, except the 97.5<sup>th</sup> percentile intakes for cereal grains were below the TDI (0.04  $\mu$ g/kg bw) (FAO/WHO, 2002) (Table 1), The 97.5<sup>th</sup> percentile exposure group for cereal grains marginally exceeded the TDI by 1.1 fold (

37. Table 4). Given that this exceedance is marginal and that this is a conservative assessment, intakes values are likely to be overestimates, implying there is no appreciable health risks for 1-5-year olds.

## **$\alpha$ -HCH**

### ***Toxicity of $\alpha$ -HCH***

38. The previous COT statement reported evidence of immunosuppression, hepatotoxicity (liver hypertrophy) and neurotoxicity (stimulation of the nervous system and inhibition of gamma-aminobutyric acid-mediated chloride ion uptake) in animal studies. As for reproductive toxicity no evidence was previously reported, although potential reproductive toxicity was noted in a study that identified significantly higher levels of  $\alpha$ -HCH in maternal and cord blood in the small for gestational age cases compared to control cases (Chand *et al.*, 2016).

39. Evidence of  $\alpha$ -HCH's genotoxicity has been inconclusive, with findings of non-genotoxic mechanism of tumorigenicity and negative Ames test results. Other studies reported increases in micronuclei and DNA breakage compared to controls. A more recent study identified  $\alpha$ -HCH as a non-genotoxic agent (Ennaceur, 2016). With regards to carcinogenicity, it was concluded that  $\alpha$ -HCH is likely to be a non-genotoxic liver carcinogen in rodents with a MOA not relevant to humans.

### **Health-based guidance values (HBGVs)**

40. The COT previously agreed that none of the HBGVs identified in literature were to be used for risk characterisation, as the human relevance of the critical effects used to derive the HBGVs were questionable, and the toxicity of  $\alpha$ -HCH is not well characterised. Although, a NOAEL of 0.1 mg/kg bw day was used as part of the risk characterisation, which has been cited in earlier and recent EFSA publications (EFSA, 2005, 2019). This NOAEL was based on liver hypertrophy and hence its use in risk characterisation would have been conservative.

### ***Sources of $\alpha$ -HCH***

#### ***Breast milk***

41. The previous statement (COT, 2014) reflects the most recent data on  $\alpha$ -HCH in human breast milk in UK populations;  $\alpha$ -HCH was not detected at an LOD of 0.01 mg/kg milk fat in samples collected between 2001 and 2002. No further studies analysing  $\alpha$ -HCH in UK breast milk samples have been performed, but it is expected that current levels remain below LOD.

#### ***Infant formula***

42. Infant formulae are included in the UK national monitoring programme for pesticide residues in food, which is overseen by the PRiF. Infant formula was last surveyed between January and February 2014;  $\alpha$ -HCH was not detected at or above the reporting limit of 0.01 mg/kg, i.e. the current MRL (PRiF, 2014a).



43. Recent monitoring of the wider UK food supply in July to September 2018 did not identify  $\alpha$ -HCH in retail samples of milk at or above their reporting limit of 0.002 mg/kg, indicating that levels in infant formula produced from cows' milk produced in the UK are likely to be well below 0.01 mg/kg (PRiF, 2018c). Soya milk, soya tofu and soya pieces have not been included in the UK pesticide monitoring programme since 2006, where the previous statement (COT, 2014) reported  $\alpha$ -HCH was undetected at its reporting limit of 0.002 mg/kg and is likely to be well below 0.01 mg/kg.

44. As previously mentioned much of the infant formula consumed in the UK is imported from Ireland. The previous COT statement includes the most recent survey data on  $\alpha$ -HCH reported by the Food Safety Authority of Ireland in 2004;  $\alpha$ -HCH was not recorded with LOQs of 0.001 mg/kg for reconstituted formula and 0.007 mg/kg for cows' milk (COT, 2014).

### *Complementary foods*

45. Animal based infant foods containing meat, fish, eggs and cheese were last surveyed by PRiF between January and September 2014 (PRiF, 2014b).  $\alpha$ -HCH was not identified in the infant food samples at or above their reporting limits of 0.01 mg/kg.

46. The presence of  $\alpha$ -HCH in cereal and vegetable based infant foods is unknown as in the most recent survey (PRiF, 2013) and in earlier surveys  $\alpha$ -HCH was not examined in these infant food samples.

47. Recent monitoring of the wider UK food supply between January and September 2018 did not identify  $\alpha$ -HCH to be over its reporting limits ranging from 0.01 mg/kg for most commodities such as fruits, vegetables and cereals to 0.002 mg/kg in meats, milk, cheese and eggs. Collectively there were 2,329 samples for a range of commodities surveyed and  $\alpha$ -HCH did not exceed its MRL of 0.01 mg/kg in any (PRiF, 2018a, b, c).

48. A survey by the Safety Authority of Ireland in 2006 included 19 samples of vegetable/meat based infant foods, 13 samples of fruit-based infant food and 11 cereal-based infant foods.  $\alpha$ -HCH was not detected in any samples at a LOQ of 0.001 mg/kg (FSA Ireland, 2006).

49. The HSE have informed that from 2008 onwards there were no positive results for  $\alpha$ -HCH in baby/infant food in their database (HSE, 2019).

50. In an EFSA report (paragraph 21) presenting results on pesticide residues in food samples taken from various reporting countries (including the UK) in 2017. It was found that  $\alpha$ -HCH was quantified below or equal to its MRL (0.01 mg/kg) in 0.9% of samples of animal origin (poultry fat and sheep) (EFSA, 2019).

### **Exposure**

### *Breast milk*

51. An exposure assessment for  $\alpha$ -HCH in breast milk was not performed, as it was not detected at the LOD of 0.01 mg/kg fat and is therefore considered unquantifiable (Woolridge *et al.*, 2004).

### *Infant formula*

52. An exposure assessment for  $\alpha$ -HCH in infant formula and cow's milk was not performed, as it could not be detected at or above many of the reporting limits/LOQs described in paragraphs (42-43) and is therefore considered unquantifiable.

### *Complementary foods*

53. An exposure assessment for  $\alpha$ -HCH in complementary food was not performed as the 2015 pesticide residues in food report by JMPR described in (paragraph 25) did not include  $\alpha$ -HCH. Furthermore,  $\alpha$ -HCH could not be detected at or above the reporting limits/ LOQs in the surveys described in paragraphs (45-47). Other data provided in an EFSA report (paragraph 21 and 49) reporting food samples containing of  $\alpha$ -HCH are insufficient to conduct a meaningful exposure assessment.

### ***Risk characterisation***

50.  $\alpha$ -HCH was not detected in samples of breast milk, cow's milk and infant formula, and complementary foods hence does not pose a toxicological concern to children aged 1-5 years old.

### **$\beta$ -HCH**

#### ***Toxicity of $\beta$ -HCH***

51. The previous statement (COT, 2014) presented findings of hepatotoxicity (increased liver weight, hyalinization and CYP induction) and a toxic effect in the thymus, testes and ovaries in animal studies. There are no recent epidemiological findings of hepatotoxicity in humans, and with regards to endocrine disrupting potential there has been conflicting findings on the association of  $\beta$ -HCH and endometriosis.

52. Other results from animal studies reported evidence of neurotoxicity (ataxia and reduced nerve tail conduction velocity) and associations between  $\beta$ -HCH and PD in humans were considered inconclusive (COT, 2014).

53. Reproductive effects of infertility were previously reported in animal studies and it was also concluded that  $\beta$ -HCH is not mutagenic (COT, 2014). With regards to carcinogenicity, the COT determined that findings of  $\beta$ -HCH causing liver tumours in rodents was via non-genotoxic mechanisms and is irrelevant to humans. Other conclusions were that evidence of associations between  $\beta$ -HCH and NHL are inconsistent, and studies showed no evidence of increased risk of breast cancer.

## Health-based guidance values

54. In the previous evaluation none the HBGVs identified in literature were used as the human relevance of the critical effects used to derive the HBGVs were questionable, and the toxicity of  $\beta$ -HCH is not well characterised (COT, 2014). Alternatively, a margin of exposure (MOE) approach was used and will be used in this current evaluation. The previous evaluation used a LOAEL of 0.18 mg/kg based on centrilobular hypertrophy as a reference point (COT, 2014). In a recent EFSA publication a NOAEL of 0.1 mg/kg for  $\beta$ -HCH was cited in earlier and recent EFSA publications (EFSA, 2005, 2019). Although, this NOAEL was based on liver hypertrophy and its use in risk characterisation will be conservative.

### Sources of $\beta$ -HCH

55. The Kalantzi *et al.*, 2004 study remains the most recent source of UK data on  $\beta$ -HCH in breast milk,  $\beta$ -HCH was detected in breast milk at mean and maximum levels of 15 and 1500  $\mu$ g/kg milk fat in samples collected between 2001 and 2003. Although, the distribution of  $\beta$ -HCH levels in breast milk reported in this study was much larger in comparison to other studies discussed in the earlier statement (COT, 2014). This earlier statement also demonstrated a historical decline of  $\beta$ -HCH levels in breast milk between 1963-2003 (COT, 2014).

### Infant formula

56. Infant formulae are included in the UK national monitoring programme for pesticide residues in food, which is overseen by PRiF. Infant formula was last surveyed between January and February 2014;  $\beta$ -HCH was not detected at or above the reporting limit of 0.01 mg/kg, i.e. the current MRL (PRiF, 2014a).

57. Recent monitoring of the wider UK food supply in July to September 2018 did not identified  $\beta$ -HCH in retail samples of milk at or above their reporting limit of 0.002mg/kg, indicating that levels in infant formula produced from cows' milk produced in the UK are likely to be well below 0.01 mg/kg (PRiF, 2018c). Soya milk, soya tofu and soya pieces have not been included in the UK pesticide monitoring programme since 2006, where the previous statement (COT, 2014) reported  $\beta$ -HCH was undetected at its reporting limit of 0.002 mg/kg and is likely to be well below 0.01 mg/kg.

58. As previously mentioned much of the infant formula consumed in the UK is imported from Ireland. The previous COT statement includes the most recent data on  $\beta$ -HCH reported in a survey by the Food Safety Authority of Ireland in 2004.  $\beta$ -HCH was not detected at a LOQ of 0.001 mg/kg for reconstituted formula or above the LOD of 0.0007 mg/kg for cow's milk in an Irish total diet study conducted during 2001-2005 (COT,2014).

### Complementary food

59. Animal based infant foods containing meat, fish, eggs and cheese were last surveyed by PRiF between January and September 2014 (PRiF, 2014b).  $\beta$ -HCH was

not identified in the infant food samples at or above their reporting limits of 0.01 mg/kg.

60. Presence of  $\beta$ -HCH in cereal and vegetable based infant foods is unknown, as in the most recent survey (PRiF, 2013) and in earlier surveys  $\beta$ -HCH was not examined in these infant food samples.

61. Recent monitoring of the wider UK food supply between January and September 2018, where 2,329 samples were surveyed,  $\beta$ -HCH was not identified to be over its reporting limits ranging from 0.01 mg/kg for most commodities such as fruits, vegetables and cereals to 0.002 mg/kg in meats, milk, cheese and eggs. Collectively, there were 2,329 samples for a range of commodities surveyed and  $\beta$ -HCH did not exceed its MRL of 0.01 mg/kg in any (PRiF, 2018a, b, c).

62. The HSE have supplied the following data regarding the presence of  $\beta$ -HCH in various foods. In 2008 one sample of whitebait from Bulgaria at 0.01 mg/kg and in 2015 one sample of feta cheese from Greece at 0.005 mg/kg (HSE, 2019).

63. In an EFSA report (paragraph 21) presenting results on pesticide residues in food samples taken from various reporting countries (including the UK) in 2017. It was found that  $\beta$ -HCH was quantified below or equal to its MRL (0.01 mg/kg) in 1.2% of samples of animal origin (poultry fat and sheep) (EFSA, 2019).

## **Exposure**

### *Breast milk*

64. Estimates of exposure from breast milk were based on the mean concentration of 15  $\mu$ g/kg milk fat (equivalent to 0.525  $\mu$ g/kg whole milk) from the most recent UK study Kalantzi et al., 2004. Although, as previously mentioned the distribution of  $\beta$ -HCH levels in breast milk was much larger compared to other HCH isomers. It was assumed that the fat content of breast milk was 3.5%).

65. Table 5 presents the exposure of  $\beta$ -HCH from breast milk to children aged (12 to 18 months).

Table 5. Chronic consumption of Breastmilk and  $\beta$ -HCH exposure to UK infants and Young children (DH, 2013)

Age group (months)	Consumption of breast milk (g/kg bw/day)		Exposure of $\beta$ -HCH ( $\mu$ g/kg bw/day)	
	Mean	97.5 <sup>th</sup> Percentile	Mean	97.5 <sup>th</sup> Percentile
12 to 15	29	75	0.015	0.039
15 to 18	25.3	51.8	0.013	0.027

#### *Infant formula*

66. An exposure assessment for  $\beta$ -HCH in infant formula and cow's milk was not performed, as  $\beta$ -HCH could not be detected at or above many of the reporting limits/LOQs described in paragraphs (56-57).

#### *Complementary food*

67. An exposure assessment for  $\beta$ -HCH in complementary food was not performed as the 2015 pesticide residues in food report by JMPR described in (paragraph 25) did not include  $\beta$ -HCH. Furthermore,  $\beta$ -HCH could not be detected at or above the reporting limits/LOQs described in paragraphs (59-60).

#### **Risk characterisation**

68.  $\beta$ -HCH could not be detected in samples of infant formula and complementary food, and therefore consumption of these foods do not pose a toxicological concern to children aged 1-5 years.

69. The MOEs for potential exposure to  $\beta$ -HCH from breast milk were calculated with a NOAEL of 0.1mg/kg bw day and are show in Table 6.

Table 6. MOEs calculated from comparison of potential exposures from breast milk in children aged 12 to 18 months to  $\beta$ -HCH with the reference point of 0.1 mg/kg bw/day.

Consumption group	Age	
	12-15 months	15-18 months
Mean	>6600	>7600
97.5 <sup>th</sup> percentile	>2500	>3700

70. The MOEs for children aged 12-18 months in the mean consumption group ranged from >6,000 to 7,600 and >2500 to >4700 for children in the 97.5<sup>th</sup> percentile

consumption group. Taking into account the use of the conservative NOAEL and unusually large distribution of  $\beta$ -HCH levels used in the exposure assessment for breast milk, these MOEs do not indicate toxicological concern for breastfed children.

## Overall Conclusions

71. Dietary exposure of  $\gamma$ -HCH in children aged 1-5 years is unlikely to be of toxicological concern as all dietary exposure estimates were in line with HBGVs, with the exception of cereal grains. However, this is likely to be an overestimate as explained in paragraph 29. As for  $\alpha$ -HCH, its dietary concentrations were lower than many of its reporting limits, implying exposure is insignificant and not of toxicological concern. Additionally,  $\beta$ -HCH had large MOE values for breast milk indicating risk of appreciable health effects are very low, additionally its presence in infant formula and complementary food were lower than its reporting limits further indicating risk of appreciable health effects to be low. Despite the lack of UK data presenting current levels of HCHs, the evidence of historical decline formely presented by the COT (COT, 2014) and its absence of use imply exposure is expected to be lower than previously reported.

### Questions to be asked to the committee

- i) Do the committee consider it sufficient to include the key points (i.e. HBGVs, exposure, conclusions) in the addendum, or wish to request a full discussion paper on the potential risk from  $\alpha$ -,  $\beta$  and  $\gamma$ -HCH in the diet of children aged 1 to 5?
- ii) Do the committee agree that exposures to  $\alpha$ -,  $\beta$  and  $\gamma$ -HCH in the diet are not of toxicological concern to 1 to 5-year olds?
- iii) Do members have any other comments?

**Secretariat**  
**October 2019**



### **Abbreviations**

ADI	Acceptable daily intake
ARfD	Acute reference dose
bw	Body weight
COC	Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment
COT	Committee on Toxicology, Consumer Products and the Environment
CYP	Cytochrome P450
DH	Department of Health
DNSIYC	Diet and Nutrition Survey of Infants and Young Children
EEG	Electroencephalogram
EFSA	European Food Safety Authority
EMRL	Extraneous maximum residue limits
FAO	Food and Agricultural Organisation of the United Nations
FSA	Food Standards Agency
GEMS	Global Environment Monitoring System
HBGV	Health based guidance value
HCH	Hexachlorocyclohexane
HR	Highest residue
HSE	Health and safety executive
IARC	International Agency for Research on Cancer
JMPR	Joint FAO/WHO Meeting on Pesticide Residues
LOAEL	Lowest observed adverse effect level
LOD	Limit of detection
LOQ	Limit of quantification
MOE	Margin of exposure
MRL	Maximum residue limit
NDNS	National Diet and Nutrition Survey
NHL	Non-Hodgkin Lymphoma
NOAEL	No observed adverse effect level

This is a draft paper for discussion and does not reflect the views of the Committee.

PD	Parkinson's disease
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PRiF	Expert Committee on Pesticide Residues in Food
RfD	Reference Dose
RIVM	Rijksinstituut Voor Volksgezondheid En Milieu, the Dutch National Institute for Public Health and the Environment.
STMR	Supervised trials median residue
TDI	Tolerable daily intake
WHO	World Health Organisation

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