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European Union comments for the

CODEX COMMITTEE ON CONTAMINANTS IN FOOD
10th Session

Rotterdam, the Netherlands, 4 – 8 April 2016

Agenda Item 12

Discussion paper on an annex for ergot and ergot alkaloids to the Code of Practice for the prevention and reduction of mycotoxin contamination in cereals (CAC/RCP 51-2003)

(CX/CF 16/10/13)

Mixed Competence
Member States Vote

The European Union and its Member States (EUMS) welcome and appreciate the work done by Germany on the discussion paper on an annex for ergot and ergot alkaloids to the Code of Practice for the prevention and reduction of mycotoxin contamination in cereals.

The EUMS wish to make following comments:

Comments on the introduction

§3: it is suggested to add at the end of the paragraph: *"Ergot sclerotia contain significant levels of toxic ergot alkaloids (EAs) which cause a number of harmful effects in humans and animals."*

§5: it is suggested to change the structure of the 2nd and 3rd sentences starting with *"Moreover, in sorghum ergot (…)"* and ending with *"(…) and the geographical location (Lorenz 1979)."* into *"In addition, dihydro-ergosine and related alkaloids are also significant components of sorghum ergot (Blaney et al. 2010). Depending on the fungi species, the host, the weather conditions and the geographical location, sclerotia contain different amounts of EAs (Lorenz 1979)."*

§6: first sentence: it is proposed to change the word "*ubiquitous*" into "*regularly occurring"*. Second sentence the word "*respectively"* is superfluous.

§10 and §11: it is proposed to combine both paragraphs as they are both related to the BfR assessment as regards the potential health risks of the presence of ergot alkaloids in cereal products in Germany.

§11: It is proposed to replace the second sentence *"Moreover, ergot alkaloids contents are believed to remain constant during processing (Fajardo 2012)"*into *"The behaviour of ergot alkaloids during processing and a possible decrease is still part of research activities and not yet clarified (Fajardo et al. 1995, EFSA 2012).*

Reasoning while *Fajardo et al.* ***1995*** (publication was in 1995 and not in 2012) no decrease of ergot alkaloids could be observed during processing, in the EFSA opinion it is indicated that during processing, in particular baking, the total amount of ergot alkaloids decreases. Furthermore new studies (not yet published) could not confirm a decrease of ergot alkaloids during processing.

It is furthermore proposed to delete the last sentence of §11 (starting with *"Thus the level of 64 µg/kg (…),* as it is not relevant to the context of the Code of Practice.

§12: It is proposed to also make reference to the maximum level established for ergot in wheat and durum wheat in the Codex Standard for Wheat and Durum Wheat (CODEX STAN 199-1995) of 0.05 % m/m in wheat and of 0.5 % m/m in Durum Wheat (the latter possibly being an error and needs also to be 0.05 % m/m)
Furthermore, it is proposed to replace the last sentence by the following: "Maximum levels for ergot alkaloids in processed cereal products might be set in the future after more occurrence data on EA content in these food products have been collected".

§14: the requirement of ploughing of the soil should be considered in the light of other requirements for soil conservation such as minimum tillage or the use of cover crops. So in case the advice is not to plough or to cultivate, growers should be made aware of the risk and e.g. to use cover crops encouraging early germination of the ergot sclerotia so that they do not coincide with crop or grassweed anthesis.

In the list of literature references, the publication year of the article of *Fajardo et al.* has to be changed from 2012 to 1995.

Furthermore, it might be appropriate to also refer to the information sheet 33 on "ergot in cereals" from the UK Agriculture and Horticulture Development Board (AHDB) which is available at http://cereals.ahdb.org.uk/media/487937/is33-ergot-in-cereals.pdf and to the information sheet published by ARVALIS (France) at http://www.arvalis-infos.fr/file/galleryelement/pj/6e/10/36/e1/vf_3019_cereales_a_paille_et_ergot7131400996353361252.pdf.

Comments on the Appendix – recommended practices based on GAP and GMP

§1: it might be appropriate to indicate that these recommended practices are in principle relevant/applicable for all cereals but in particular relevant/applicable to the most sensitive crops such as rye, triticale, sorghum and pearl millet.

§3: Reference is made to the comment on §14 of the introduction.
In addition, in case the field has been ploughed to avoid that ergot sclerotia remain on the field at surface level, it should be advised that no ploughing should take place in the year thereafter as research has shown that this second ploughing could bring back about 60 % of the ergot sclerotia in the upper layers of the soil and the ergot sclerotia may have maintained their germinating power.

§7: it is suggested to replace the recommendations in §7 by the following (additions/deletions highlighted): "*Combat inferior/**weed** grasses within the cereal under cultivation **with appropriate crop management procedures including crop protection products where necessary** and also employ a higher level of crop hygiene at the field's edge; **These crop management procedures to combat the inferior/weed grasses in the field and on the field's edge have to be continued for at least two years after a contamination by ergot has occurred on a field;** Ensure effective care of the margin **through close control of weed grasses/host plants around hedges and trees**; combat host plants by ~~cutting~~ **controlling** them before ~~blossoming~~ **flowering** of the crop."*

The addition of the requirement to continue to control inferior /weed grasses for at least two years after ergot contamination is very important as the presence of inferior/weed grasses maintain the inoculum present in the soil and the infection potential of the field.

There is no §12.

§21: Besides mentioning the scrubbing, brushing or peeling as "white-cleaning" process, it is appropriate to add scouring and air-aspiration as possible with cleaning process.

Referring to the comment made for §1 of the Appendix, it might be appropriate to mention that the white-cleaning process might not be applicable to all grains. For e.g. the "white cleaning" process may cause processing anomalies in malting barley by damaging the husk or may not be allowed on grain for distilling under the e.g. Scotch Whisky regulations.