

European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
13th Session

Yogyakarta, Indonesia, 29 April – 3 May 2019

Agenda Item 17

**Discussion paper on the establishment of maximum levels for total
aflatoxins in cereals (wheat, maize, sorghum and rice), flour and cereal-
based foods for infants and young children**
(CX/CF 19/13/15)

European Union Competence
European Union Vote

The European Union (EU) welcomes and appreciates the work done by electronic Working Group chaired by Brazil to prepare the discussion document CX/CF 19/13/15 related to the establishment of maximum levels (MLs) for total aflatoxins in cereals (wheat, maize, sorghum and rice), flour and cereal-based foods for infants and young children.

1) As regards the recommendations provided in §17 of CX/CF 19/13/15, the EU

- can agree with the selected food categories for which a possible ML for total aflatoxin should be considered;
- does not agree with the exclusion of whole wheat flour;
- is of the opinion that rice flour should be included and that it can possibly be grouped with polished rice;
- is of the opinion that parboiled rice should not be excluded at this stage; if following the call for data it is confirmed that the aflatoxin contamination in parboiled rice is very low, it can then be decided to no longer pursue the possible setting of a maximum level in parboiled rice;
- is of the opinion that sorghum should be included given its contribution to the exposure to aflatoxins in several GEMS/Food clusters;
- agrees with a call for data on total aflatoxin occurrence for the selected food categories (taking into account the comments above).

2) The **project document provided in Appendix I** should be updated in accordance with the decisions taken as regards food categories to be covered, **in particular the food categories mentioned in point 2 of the project document.**

3) **The text under point 3 of the project document** has to be deleted and be replaced by the following:

“MLs for aflatoxins in cereals and cereal products, considering

- the Policy of the Codex Committee on Contaminants in Foods for exposure Assessment of Contaminants and Toxins in Foods or Food Groups (Procedural Manual Section IV); and
- the criteria for the establishment of maximum levels in food and feed established in Annex I of General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995) .

4) **In point 5 of the Project document** it is indicated that *“The establishment of MLs for AFs in cereal and cereal-based products will contribute to the reduction of AFs intake what was already indicated as mandatory in the risk assessment performed by JECFA.”*. This sentence might be confusing as it could be understood that the establishment of MLs was indicated as mandatory in the risk assessment performed by JECFA. This is not correct as JECFA recommended *“that efforts continue to reduce aflatoxin exposure using valid intervention strategies, including the development of effective, sustainable and universally applicable preharvest prevention strategies”*.

Therefore, it is proposed to replace the last sentence under point 5 by the following:

“JECFA recommended that that efforts continue to reduce aflatoxin exposure using valid intervention strategies, including the development of effective, sustainable and universally applicable preharvest prevention strategies.

The establishment of MLs for AFs in cereal and cereal products will contribute to the protection of consumers’ health.”

5) **As regards the table provided in §16 of the background document** in Appendix II of CX/CF 19/13/15, the EU wishes to make the following comments:

- It is unclear why there is no ML for aflatoxin total suggested for sorghum and cereal based foods for infants and young children.
- It is not appropriate to suggest the same ML for whole wheat flour as for wheat grain destined for further processing, given that cereals destined for further processing have to undergo an additional treatment/processing that has proven to reduce the level of aflatoxins before being used as ingredients in foodstuffs, otherwise processed or offered for human consumption. The EU is of the opinion that it is appropriate at this stage to suggest for whole wheat flour the same ML as for flour, meal, semolina and flakes derived from wheat.