

**European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
10th Session**

Rotterdam, the Netherlands, 4 – 8 April 2016

Agenda Item 9

**Draft Revision of the Code of practice for the prevention and reduction of
mycotoxin contamination in cereals (CAC/RCP 51-2003)
(General Provisions) (at Step 7)**

(REP15/CF Appendix VII and CX/CF 16/10/10)

*Mixed Competence
Member States Vote*

The European Union and its Member States (EUMS) refer to the findings from the FAO/WHO project on mycotoxins in sorghum and the suggestions for inclusion in the Code of Practice as mentioned in §12 of document CX/CF 16/10/3 – Add 1. The EUMS suggest to include the information as regards the seeds in §14 of the draft Code of Practice and the information as regards immediate post-harvest practices in §28 of the draft Code of Practice.

§2 and rest of the document: the EUMS is of the opinion that it is most appropriate to use the term "mycotoxigenic fungi" throughout the document.

§9: besides the importance of education of producers it is also important to educate the collectors and the processors.

§9b: the EUMS are of the opinion that there are currently for most mycotoxins reliable test kits available and therefore the EUMS are of the opinion that the focus should be on the effective use of the test kits rather than then development and availability of these test kits.

Table 1: "alternariol methyl ether" instead of "methyl ether alternariol", "millet" instead of "milet"

§21: reference is made to mechanical drying equipment. It is important to highlight the need to use proper drying techniques in order to avoid contamination by contaminants generated by improper drying techniques such as polycyclic aromatic hydrocarbons (PAH), dioxins, ...

Furthermore, the EUMS would like to receive some clarification/explanation on the washing methods referred to in §28 and the reasons for application of washing methods or situations in which such washing methods are used. The EUMS note that drying of cereals after washing to sufficient low moisture content is a challenge being aware of the challenge to dry cereals to sufficient low moisture content in case of harvest in wet weather conditions.

In §30: it is also appropriate to refer to good drying practices (cf. comment on §21).

As regards §35, given the confusion and the different views on the appropriate moisture content for bagged cereals compared to bulk cereals, it is proposed to delete the last sentence (starting with "When stored by the conventional ...;") of §35.

§38 last sentence: when spoiled grain has been removed, it may be necessary to aerate the remaining grains to lower the temperature **and the moisture** to acceptable levels.

§39: The last sentence is confusing. The EUMS propose to replace it by "Extremely cold temperatures will also inhibit insect growth and reproduction, reducing risk of insect damage **and** in turn **limit** mould growth".

§42: the validated predictive models as such do not control fungal growth and mycotoxin production but the management measures taken based on these validated predictive models do. Therefore it is proposed to modify the last sentence as follows: "**Management measures taken by making use of** validated predictive models, when available, can control fungal growth and mycotoxin production during these procedures."

§46: it might be appropriate to mention that it is important that the short-term storage at the processors' level is performed under the same conditions / requirements as for long-term storage.

§47: the EUMS are of the opinion that it is important to refer to the proper implementation of sampling plans and analytical testing in order to provide accurate and representative results.

Furthermore, as regards the last sentence in §48, the EUMS would like to indicate that it is also important to monitor mycotoxin levels in the separated hulls and seed coat (bran layers) fractions when intended for feed. Therefore, it is suggested to change the last sentence of § 48 as follows: "*Where these fractions are to be used for **feed and food** use rather than being discarded, it is also important to monitor mycotoxin levels to ensure **feed and food** safety in the products as consumed **or fed** (or as used) ."*