

**European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
9th Session**

New Delhi, India, 16 – 20 March 2015

Agenda Item 11

**Proposed draft Revision of the Code of Practice for the Prevention and
Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003)**

(CX/CF 15/9/10)

*Mixed Competence
Member States Vote*

The European Union and its Member States (EUMS) welcome and appreciate the work on the revision of the Code of practice for the prevention and reduction of mycotoxin contamination in cereals (CAC/RCP 51-2003) by the Electronic Working Group under the lead of Brazil and co-chaired by Nigeria and the United States of America.

The EUMS have no objection to include an Annex for ergot alkaloids but note that this was not discussed at the 8th Session of CCCF when the new work was agreed¹.

Therefore the EUMS support the opinion to elaborate first a discussion paper on the appropriateness of including an additional annex for ergot alkaloids and for other mycotoxins of relevance such as e.g. sterigmatocystin (put at the 8th Session of CCCF on the priority list for evaluation by JECFA).

As a general remark, the EUMS observe that it would have been helpful if besides the clean version also a track changes version with the current code CAC/RCP 51-2003.

This draft Revision integrates the Annex on the prevention and reduction of aflatoxins and OTA in sorghum. The EUMS note that in this revision the following two measures from the Annex 5 – prevention and reduction of aflatoxins and ochratoxin A contamination in sorghum and sorghum products are not included:

*“4. Do not grow sorghum in or close to cocoa trees, coffee bean plants or grape vines as these crops are highly susceptible to ochratoxigenic fungi and ochratoxin A contamination and thus will inoculate the soil with *Aspergillus ochraceus* or *Penicillium verrucosum* in tropical and temperate climates, respectively with consequent carryover to the sorghum grains.*

¹ REP14/CF , §§ 97-99

6. *If available and cost effective, extension officers should assist the farmers in procuring and releasing atoxigenic A.flavus and A.parasiticus into the agricultural environment to suppress the natural occurrence of the aflatoxigenic fungi following the instructions of the manufacturer.*”

On the use of atoxigenic strains several references are included in the reference list but the use is not mentioned in the proposed revision of the Code of practice.

Furthermore the EUMS have the following, including editorial, comments (**not exhaustive**)

- §5: in the second sentence, delete “and” between intermittent and presence.

- §9 (b):

As regards the first sentence, the EUMS does not see the relation between the need to make this Code available for producers/handlers/processors for accessing quick, affordable and accurate test kits and associated sampling plans (...)

The EUMS are of the opinion that this sentence might need to be reformulated highlighting that an access to affordable and accurate test kits are crucial for an effective implementation of this Code of Practice.

- Table 1 on page 3 is not exhaustive/complete:

- no mention is made of certain (emerging) mycotoxins such as e.g. sterigmatocystin, enniatins, beauvericin, sterigmatocystin, diacetoxyscirpenol, T-2 and HT-2 toxin.
- no mention is made of certain relevant fungi such as e.g. *Fusarium equiseti*, *Fusarium avenaceum*, *Fusarium langsethii*.

- §12: it is important to make reference to the use of seed that is certified and is free from mycotoxin

- §14: second sentence: suggest “Sow only those varieties (...)” instead of “Seed only these varieties (...)”

- § 25: The last sentence is not understandable as the word “separate” is missing “If possible, harvest grain in such field(s) shown to have a higher infection rate by *Fusarium* ear blight through preharvest monitoring or surveying of grain separate from fields with a lower infection rate. “

- §26: The first sentence is proposed to be reformulated as follows: “In transport in closed containers or trucks, grains with high moisture content should be avoided to remain long period in these conditions before drying.”

- §27: it is appropriate to add “If it is not possible to dry the commodities immediately, aerate them by forced air circulation and keep the period before drying as short as possible”.

- §28: However it is important that the grain is not be damaged”. Furthermore it might be appropriate to add that washing of grains should be avoided.

- §30: it is appropriate to add that grains should also during sun drying be protected from soil, pests and droppings from birds besides rain and dew
- §31: “ a_w ” instead of “aw”.
Instead of “(...) moisture content of grains during storage should not be higher than 15 %” it is better to say ““(...) moisture content of grains during storage should **be lower** than 15 %”
- §36: “relevant” instead of “warranted”
- §37: it is appropriate to add the sentence “Bags should not be reused” before the last sentence.
- §50: replace last sentence “Such containers must deter insect and rodent infestation” by “Such containers must deter insect and rodent infestation and should be subject to integrated pest control measures.
- Annex 1 on zearalenone, § 5: Suggestion to replace the first sentence with “Zearalenone risk in wheat increases with preharvest rainfall especially if harvest is then delayed”.
- Annex 3, §4: Crop lodging on the field can also result in the production of OTA in humid conditions.
- Annex 4 on Trichothecenes: It would be appropriate to mention in the Code of Practice what mycotoxins are covered by trichothecenes (e.g. in Table 1)