

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 12

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Tenth Session
Rotterdam, The Netherlands, 4-8 April 2016

(Comments submitted on by European Flour Millers')

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)

EUROPEAN FLOUR MILLER'S (EFM)

The European Flour Millers' association is the voice of the European flour milling industry. It gathers the national associations from 28 European countries. They represent 3 800 companies, most of which are SMEs, employing 45 000 people. With some 45 million t of agricultural raw materials processed in the EU each year, the sector is the largest single user of EU domestic wheat, rye & oat for the food industry.

We would like to suggest the following changes to the proposed draft discussion paper prepared by Germany:

Introduction, Paragraph 4: “[...]. A contamination of the harvested product with ergot and the toxic compounds – ergot alkaloids (EA) – can occur. [...]”

We suggest removing this sentence. Why? *Claviceps purpurea*, *Claviceps Africana*, *Claviceps fusiformis* do grow only in the field. A post-harvest development of ergot is botanically impossible. As far as we know, grain lot contamination with ergot alkaloids can only take place when a lot with sclerotia and a lot without are mixed.

Paragraph 19: “[...] *The adhering dust on the grain surface can be removed by cleaning the surface of the kernels e.g. via scrubbing, brushing or peeling. [...]*”

We suggest removing this sentence. Why? This is not true. Ergot dust is very sticky, fatty. It cannot be removed completely by scrubbing, brushing or peeling. We suggest replacing it by *Part of the reduction process is cleaning the surface of the kernels, e.g. via scrubbing, brushing or peeling.*

Conclusions, Paragraph 22 (c): “A group tolerable daily intake (TDI) and a group acute reference doses (ARfD) value have been defined.”

We suggest removing this sentence. Indeed, a previous German BfR document made the assumption that small children of 2-3 years old age would eat 2-4 slices of rye bread. Based on the normal body weight of these children, they felt under the scope of their recommendation. The food report stating this number of slices did mention only “bread”, not rye bread. We believe rye bread is definitively not eaten in this quantity by children of that age. The BfR asked VDM, the German Milling Association, to provide new and more accurate data, which they could not provide though.

Are still missing in the proposed draft discussion paper the following aspects:

1. There is no approved test kit yet available to test the quantity of ergot alkaloids. As far as we know, it is the European Commission's intention to foster the development of a rapid test before enforcing Maximum Limits (ML) for Ergot Alkaloids;
2. The draft discussion paper does not mention the ergot alkaloids to be regulated through a ML;
3. We definitely need more data to find out to what extent this ergot dust might add to the ergot alkaloid content of the grain;
4. A feasible ML should allow sustainable production of rye flour and consumption of rye bread;
5. Progress in breeding for resistance to ergot in rye is necessary and should be fostered by public authorities;