

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 10

CX/CF 16/10/11-Add.1
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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

PROPOSED DRAFT ANNEXES TO THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF MYCOTOXIN CONTAMINATION IN CEREALS (CAC/RCP 51-2003)

Comments at Step 3 submitted by Canada, Colombia, Costa Rica, Ecuador, Indonesia, Iran, Kenya, Sudan and AU

CANADA

Canada thanks Brazil for leading the electronic working group (eWG), which was co-chaired by Canada and the United States.

Canada provided comments as part of the eWG on the annexes for zearalenone, ochratoxin A, and the tricothecenes (including DON), which included comments from industry and government stakeholders. Minor suggestions were also submitted regarding the fumonisin and aflatoxin annexes.

Canada supports the adoption of the Annexes to the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003) and thanks the eWG for incorporating the comments provided by Canada.

COLOMBIA

Colombia is glad to submit its position of agreement concerning the document PROPOSED DRAFT ANNEXES TO THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF MYCOTOXIN CONTAMINATION IN CEREALS (CAC/RCP 51-2003), in the sense of expressing our support to the advancement of this item in the Steps procedure in the Codex Alimentarius.

The recommendations in the five (5) annexes concerning the implementation of good agricultural practices (GAP) and good manufacturing practices (GMP), especially for Ochratoxin A, Zearalenone, Fumonisins and Tricothecenes, are considered to contribute to preventing and reducing mycotoxins in cereals.

The use of seeds that have been approved for each agroecological zone, the obligation to use improved seeds with treatments to eliminate or reduce fungi in seeds, and management of tolerance levels of contaminating fungi in national or imported food products, could be considered to be included in the document.

Colombia is interested in having the annexes in order to develop, whenever necessary, interventions in the different grains production phases, taking into consideration the impact of the thermal gap (day/night) on the incidence of fungi in cereal grains, along with government policies in the land management plans for the different regions.

COSTA RICA

Costa Rica appreciates the work done and has no comments to the proposal.

ECUADOR**(I) General Comments:**

Ecuador appreciates the efforts made by Brazil, Canada and the United States for the development of the proposed draft Annexes to the Code of Practice for the prevention and reduction of mycotoxin contamination in cereals, and in this regard wishes to submit the following comments:

Domestic cereal production of Ecuador covers a total of 3,149,009 tonnes (t) (INEC, 2014); this production is used for domestic consumption, however it does not supply the demand of the country; for this reason Ecuador is a grain importer country (1,015,328.66 t - according to data reported by the Central Bank of Ecuador in 2015).

While in Ecuador have not been reported problems of mycotoxin presence in cereals, the country is implementing as a mitigation measure Good Agricultural Practices and monitoring processes and control of contaminants in agricultural products; for this reason and in order to allow trade flow with other countries and protect the health of Ecuadorian consumers, Ecuador would support the continuation of the proposed draft annexes to this code of practice.

Finally, Ecuador would like to indicate that once this proposed draft standard is approved the country will adopt the recommended measures and incorporate them into their Good Agricultural Practice guides and manuals on Applicability.

INDONESIA

The followings are Indonesia comments:

Proposed Draft Revision Of The Code Of Practice For The Prevention And Reduction Of Mycotoxin Contamination In Cereals (CAC/RCP 51-2003) (Step 5)	Indonesia comments
<p>Harvest</p> <p>25. During the harvesting operation, the moisture content should be determined in several spots of each load of the harvested grain since the moisture content may vary considerably within the same field. As far as possible, avoid harvesting grain with high moisture contents due to precipitation or morning dew and late afternoon as it takes a longer time to dry. If possible, harvest grain in such field(s) as shown to have a higher infection rate by <i>Fusarium</i> ear blight through preharvest monitoring or surveying of grain separate from fields with a lower infection rate.</p>	<p>Indonesia proposes to add new sentences as follows:</p> <p>25. During the harvesting operation, the moisture content should be determined in several spots of each load of the harvested grain since the moisture content may vary considerably within the same field. As far as possible, avoid harvesting grain with high moisture contents due to precipitation or morning dew and late afternoon as it takes a longer time to dry <u>and avoid temperature increase by controlling the height of grain load.</u> If possible, harvest grain in such field(s) as shown to have a higher infection rate by <i>Fusarium</i> ear blight through preharvest monitoring or surveying of grain separate from fields with a lower infection rate.</p>

IRAN

1-Annex 1, clause 5: It is recommended that: weather forecast' in parallel with predictive modeling for risk of *Fusarium* infection is added for planning the harvest.

2-Annex 3, clause 8: It is recommended somewhat change in the below sentence:

“the grain to a moisture content corresponding to a water activity of less than 0.70 (preferably 0.65).

3-Annex 5, clause 8: above suggestion is recommended too.

4-Annex 5, clause 10: It is recommended that safe level is mentioned.

KENYA**SPECIFIC COMMENT**

We have gone through the document and finds it acceptable. We recommend its advancement for adoption

SUDAN

Sudan suggested (CX/CF 15/9/10-Add.10) the use of the terms “strain”, “race”, “infection”, and “contamination” following the definitions of The British Technical Subcommittee of the Federation of the British Plant Pathologists. Paper No: 17.Commonwealth Mycological Institute.

Brazil in this document, in an attempt to avoid confusion regarding the use of the same terms, proposed definitions based on: the Dictionary of Fungi and communication with Dr John Pitt.

No matter whether the definitions cited from the above different sources agree or otherwise, the wording may lead to different interpretation and the confusion remains.

The status of the association of the toxigenic fungus with the crop may be saprophytic. In this case it is regarded as a contaminant such as *Aspergillus flavus* (aflatoxin); or pathogenic which is regarded infective such as *Claviceps Africana* (ergot alkaloids).Also the fungus may have a saprophytic and pathogenic status such as *Fusarium graminearum* (DON).

Similarly the status determines at what stage (pre or post-harvest) the crop becomes contaminated with the mycotoxin and consequently on the recommendations regarding the COP and annexes.

Conclusion: In view of the fact that the terms mentioned in the foregoing paragraphs are key words in the COPs and their ANNEXES development, and the possible differences in the interpretation of definitions. Sudan suggests CCCF takes the appropriate step towards an endorsed definition of the terms: strain, race, infection, contamination, infestation and inoculation for the purposes of Codex Alimentarius so that it can be included in **CODEX ALIMENTARIUS COMMISSION –PROCEDURAL MANUAL** and all to be abide with.

Secretariat’s Note: PLEASE NOTE THAT THE COMMENTS ABOVE ARE ALSO APPLICABLE TO AGENDA ITEM 9

Sudan is happy to express a high consideration for the effort put in this document by Brazil, Canada, the United States of America and the rest of the members of the EWG.Following are comments on some points in the document

Annex 1:

Para 1: line2: botanical names of fungi to be written in *italic* e.g. *F.graminearum* etc.

Last line: add the relevant before *Fusarium* to read: the relevant *Fusarium spp.*

Para 4: 1st line: add: toxigenic before *Fusarium* to read toxigenic *Fusarium* infection...

Annex 2:

Para 1: Line 2: botanical names of fungi to be written in *italic*

Annex 3:

Para 1: Lines 1,2 and 3: botanical names of fungi to be *italicized*.

Annex 4:

Para. 1 Line 1 insert:trichothecenes producing before *Fusarium* to read: trichothecenes producing *Fusarium spp...*

Same para. amend the last sentence to read as follows:

The more common trichothecenes are deoxynevalenol (DON)(produced mainly by *F.graminearum* and *F.culmorum*),T-2 and HT-2 (produced by several *F. spp.* e.g *F.sporotrichioides* and *F. poae*), diacetoxyscirpenol (DAS) (produced by *F.equisiti*, *F. poae*,*F. acuminatum*.) strigmatocystine (STC) (produced by *Aspergillus nidulans*, *A.vesicolor* and other related species)and nivalenol (NIV).(produced by *F.nivale*, *F.poa*,*F.culmorum* and *F.graminearum*.)

Annex 5:

Para. 1 botanical names of fungi mentioned in this para. to be *italicized*.

Para. 3 line 2: italicize the botanical names of fungi. Add races after *parasiticus*.

Last line replace fungi by races to read: the aflatoxigenic races following....

Para. 5 line 1 to read: Biological methods can be used for the control of aflatoxins.....

Last line: replace plant pathogen by: toxin producing fungi.

AFRICAN UNION (AU)

Position: AU supports the work on the separate Annexes and their adoption at Step 4.

Editorial Comment:

1. In Appendix 1, para 1 it should state pre-harvest infection, not pre-harvest infestation.
2. In Appendix 1, para 11 replace the word corn with the word maize as used elsewhere in the document.

Issue & Rationale: The Annexes submitted to CCCF9 were returned for further development and comment at step 2/3, particularly for new developments related to deoxynivalenol (DON). These issues are of particular interest to the African situation and the development of Annexes should include the latest information available on mycotoxin control.