



FoodDrinkEurope comments on the proposed MLs for DON and T-2 / HT-2

Alejandro Rodarte

Manager Food Policy, Science and R&D

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FoodDrinkEurope



25 National Federations

27 EU Sector Associations



23 Liaison Companies



The EU food and drink manufacturing industry

EU food and drink industry figures

TURNOVER

€1,192 billion

Largest manufacturing sector in the EU

VALUE ADDED

2.1%

of EU gross value added

CONSUMPTION

13.8%

of household expenditure on food and drink products

EMPLOYMENT

4.72 million people

Leading employer in the EU

NUMBER OF COMPANIES

294,000

R&D

EXPENDITURE

€2.9 billion

SALES WITHIN THE SINGLE MARKET

91%

of food and drink turnover

SMALL AND MEDIUM-SIZED COMPANIES

47.5%

of food and drink turnover

60.8%

of food and drink employment

EXTERNAL TRADE

€110 billion

Exports

€74 billion

Imports

€36 billion

Trade balance

19%

EU share of global exports

An EU feed and food chain reflection on mycotoxin risk management



copa*cogeca
european farmers european agri-cooperatives

euromaisiers



European
Flour
Millers

FEFAC
Experts in Animal Nutrition

FOODDRINK
EUROPE

FRUCOM

Primary
Food
Processor!

unistock Europe
Association of Professional Potstill Workshops in the Food and Feed Chain

1. Prevention

2. Optimised
management of
contaminated crops

3. Setting of
standards

More effective solutions that can deliver better food and food safety while optimising resources, other than regulating based on strict regulatory standards

General comments on the DON and T-2/HT-2 proposals

- Risk management based on mitigation measures, instead of MLs:
 - Development and implementation of Code of Practices
 - For control, the use of indicative values or action limits
- A holistic approach for the management of contaminants is imperative
- Year-to-year and region-to-region variation is a fact
- ML offer little flexibility for review in light of geographical and annual variation.
- Setting of MLs for both raw materials and final products is counter-productive.

Specific comments on the DON proposal

- The proposed DON levels in unprocessed oats are especially challenging for the northern Member States.
- Significantly lower MLs for DON are proposed for cereal products than for the raw materials -> this does not reflect the effects from processing for many finished products.

Specific comments on the T-2/HT-2 proposals

- We therefore strongly suggest to reconsider setting of MLs but instead continue with the current approach of indicative levels..
- In case MLs are set, they should be established at the stage of entry of the mycotoxins in the supply chain -> We are therefore in favour of Option B for category 3.3.



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