

CER(09)730:1

For the attention of Mr Frans Verstraete

For the attention of the experts in the
Agricultural Contaminants Group and the Food
Chain Committee

EUROPEAN COMMISSION
DG SANCO
200, rue de la Loi
1049 – BRUSSELS

Brussels, 6 February 2009

Re: Forum on fusarium toxins on 9 and 10 February 2009 – Copa-Cogeca remarks

Dear Mr Verstraete,
Dear members of the Agricultural Contaminants Group

First of all, we would like to thank you for organising this forum, which allows active organisations such as Copa and Cogeca to take part. This is an important event for us. It offers us the opportunity to clearly state our views on the various issues addressed and to share with you information that we gather once a year at each harvest thanks to the technical institutes that support our producers.

As with previous forums, we think it is important to reiterate our remarks and put them in writing.

1- General remarks regarding the European arable crop sector

Let us recall the importance of this sector and the increasingly difficult constraints faced by producers and their cooperatives:

- The EU is a key player. In 2008, almost 311 million tonnes of cereals were produced in the Europe of 27 (see appended table), or approximately 18% of world production. Cereals are produced in very different climates, from the north to the south.
- Producers are faced with the challenge of climate change and are the first to suffer the consequences through extreme events such as floods and droughts, inter-seasonal and inter-annual rain levels that influence crop cycles and the emergence of new plant diseases. This situation means there is a greater risk of low agricultural yields, at a time when the global context requires much more food to be produced for a population with ever-increasing purchasing power and keen to eat more meat, particularly in the Asian economies.

- At the same time, the EU has just decided to reduce the number of plant protection products available, thus raising fears that plants will become resistant if only one product is available, and above all, increasing the risk that mycotoxins will develop if some substances (triazoles) disappear.
- Furthermore, the EU is pursuing its policy of not allowing EU producers access to new GM varieties which help control the development of mycotoxins on a case by case basis while encouraging imports of GMOs. All of this against a backdrop of market liberalisations.
- **The last two points are essential to bear in mind for a group like yours: reducing the presence of mycotoxins while at the same time taking away producers' ability to control them and denying them access to new tools is a real concern.**
- Finally, the cost of energy and inputs (fertilisers), particularly this year, has caused production costs to grow in a context where prices paid to producers have fallen to 2006 levels, i.e. below the cost of producing most cereals.

2- Specific remarks

a. T-2, HT-2 (see our presentation)

There are a certain number of concerns regarding oats and barley in particular. We share the concerns raised by key players in the sector.

- SANCO questionnaire (see responses in our presentation):

From our point of view, the questionnaire is incomplete and does not address the issues of toxicity and consumer exposure. These are essential issues which must be addressed before any discussion on the value of regulating these toxins. In our opinion, we do not have enough specific and recent information to clearly indicate the Tolerable Daily Intake (TDI) for consumers. The same holds true for exposure studies: rare and old, they were conducted using analysis methods with overly-high detection limits.

As long as this information has not been acquired, it is too early to move towards regulation. Moreover, given the lack of current data over a significant period, we believe it is too early to set thresholds for these toxins, even for oats or barley. A guide to good practice for producers is needed, **but not currently possible for want of valid recommendations that are genuinely useful for prevention.**

In addition, it would seem that our knowledge of other toxins does not apply to toxins T-2 and HT-2 (cf. Commission recommendation of 17 August 2006 on the prevention and reduction of mycotoxins); this makes it all the more necessary to keep working and to gather field data over significant periods.

Under these conditions, it is important not to start introducing systematic batch tests because they are expensive for the sector and for producers while providing no guarantees that the market will take these constraints into account.

b. ANALYSIS AND SAMPLING METHODS: still a priority (see presentation made jointly with COCERAL)

We wish to reiterate that before maximum limits are put in place it is essential to have access to safe, quick and inexpensive analysis and sampling methods which can be complied with, in particular for large volumes of cereals. Such methods are a prerequisite to the legislation's implementation. They are a necessary tool. It is worth noting that this dossier, presented as a priority from the very first forum, has not moved forward.

It is important to avoid creating unjustified extra costs for European agriculture which harm competitiveness. These methods must not lead to legal uncertainty: on the contrary, they must allow safe commercial transactions to be carried out. As such, analysis and sampling method uncertainty must be taken into account to reassure consumers that the legislation is being correctly applied.

c. MYCOTOXINS WITH THRESHOLDS (see presentation)

Copa – Cogeca can only reiterate its earlier positions, presented at previous forums, and highlight the difficulty of complying with existing thresholds in the event of climate conditions, uncontrollable by definition, which foster the development of mycotoxins, as was the case in 2007 and 2008.

d. ANIMAL FEED

Copa – Cogeca is in favour of maintaining recommendations and does not have any particular remarks to make (earlier positions remain unchanged).

We are available to respond to any questions your group may have. Thank you in advance for your consideration of our presentations and main messages.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Pekka Pesonen', with a long horizontal stroke extending to the right.

Pekka Pesonen
Secretary General

Appendix: EU cereals production in 2007 and 2008 – source DG AGRI – December 2008

