

**COCERAL**

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**FIFTH FUSARIUM FORUM
10th-11th January 2008****COCERAL Position Paper**

COCERAL is the acronym for "Comité du Commerce des céréales, aliments du bétail, oléagineux, huile d'olive, huiles et graisses et agrofournitures" and is considered as the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

The members of COCERAL are the national trade organizations of most of the EU-27 Member States, who for their part represent collectors, distributors, exporters, importers and agribulk storers of the above mentioned commodities. The members are composed of essentially private traders and in some countries also farmers' cooperatives.

COCERAL makes the following contribution to the European Commission and national experts for this «Mycotoxins» Forum of 10/10 January 2008 organized by DG SANCO.

COCERAL confirms that trade is fully aware of its responsibilities in the management of mycotoxins in the food and feed chain, with the objective of protecting consumer health.

1. The management of mycotoxins in food and feed chain: the need for recognised and certified technical protocols.

Traders - collectors and importers / exporters - are directly affected by the regulations about mycotoxins. So far, despite the publication of the Regulation on official controls, there are no technically validated protocols for efficient sampling and analysis in place. This deficiency can lead to disputes during official controls organized by the member states. This situation could lead to the unjustified withdrawal of lots and have major economic consequences for our companies. It is therefore important that in all member states companies subject to controls

and controllers themselves can in future use the same protocols and that these protocols meet the time and cost demands of the commercial world.

In addition, those traders who advise and distribute agro-supplies will both provide technical advice to farmers and encourage the following of Good Agricultural Practice in order to limit the presence of mycotoxins (eg. variety, tillage, previous crop).

> *COCERAL demands that the European Commission and Member States:*

- *recognize the **lack of validated, operational protocols** for companies directly affected by these European regulations,*
- *identify **useful protocols for sampling and rapid analysis methods applicable in companies**, with the support of any professional or sector organizations,*
- *accelerate the **standardization of reference analysis protocols** used by the laboratories, in conjunction with the European Committee for Standardization (CEN).*

These issues are prerequisites for controlled companies and the national public controllers to use the same protocols. These conditions are valid for controls of goods coming from third countries into EU for intra-Community trade between Member States.

2. Regarding toxins T2/HT2:

T2/HT2 toxins are field mycotoxins, which affect certain crops on farms. To date there are no rapid test kits which are available for use by companies for these particular toxins. Accordingly the trade is not able to produce representative data on these toxins for this Forum. The few data available today are those from basic research projects or from particular markets where these are the mycotoxins of primary concern.

> *In recalling the demands referred to in section 1, COCERAL therefore requests that the European Commission should recognize: **inadequate rapid analysis** in field and silo,*

- *the **lack of representative data** collected on toxins T2/HT2 (including upstream of the food and feed chain),*
- *the need for the **European Food Safety Authority (EFSA)** to provide an opinion on T2/HT2 toxins for human consumption,*

- *the need to **identify the products most affected (barley, oats)**, according to the average consumer's exposure to T2/HT2 toxins.*

These issues are prerequisites to pursue the establishment of maximum regulatory limits on T2/HT2 toxins for food consumption.

3. On the recommendation Mycotoxins in animal feed:

In accordance with the recommendation CE/576/2006 of June 16, 2006, traders have integrated recommended guidance values in their HACCP system. Monitoring is carried out using the appropriate sampling and rapid analysis methods currently available to the company. In the case of the guidance value recommended for animal feed being exceeded, traders will notify their customers who can then decide the conditions of use of the batch.

> In recalling the demands referred to in section 1, COCERAL demands that the European Commission and Member States:

- ***keep the recommendation** as it stands,*
- *perform a **specific evaluation of the conditions of implementation** of this recommendation by operators and inspectors in the Member States in relation to the objectives originally set,*
- *In advance of any proposal which might suggest a move from a guidance level to regulatory limits, launch a **study on the legal impact and the economic consequences** such a move would bring: *the legal status of non-conforming lots in particular would need to be addressed.**

Fur further details please contact

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