01/08

To: Mr. F. Verstraete,
DG SANCO E3
EU Commission
200, rue de la Loi
1049 Brussels

Brussels, 9 January 2008

Dear Mr Verstraete,

As you know, Euromaisiers will not be making a verbal presentation at the mycotoxin forum on 10 January 2008. Nevertheless we have prepared the attached briefing note which might be useful to member states and delegates attending the meeting.

Naturally we are at your disposal should you require further information and will in any event be represented at the forum.

Kind regards

Alexander Waugh
Euromaisiers Vice Chairman
& Technical Committee President

01/08 9 January 2008

FIFTH FUSARIUM FORUM
10th-11th January 2008

Euromaisiers Position Paper

T2 and HT2 toxins

Euromaisiers members have carried out a limited amount of monitoring for the mycotoxins T2 and HT2 over the past few years. The data have been collected from several companies using maize from different geographic locations and over several different harvest years. The main sources relate to maize from France, Argentina and to a lesser extent Italy.

In general the levels found have been low – the overwhelming majority below the limit of quantification. Results are summarised below.

T2 + HT2 combined (LOQ 50ppb combined; 50ppb for T2; and 10ppb for HT2)

Harvest year	Total samples	Maize				Maize Grits		Maize flour		Animal feed	
		<50ppb	50-100 ppb	100-200 ppb	200-300 ppb	<50 ppb	50-100 ppb	<50ppb	50-100 ppb	<50ppb	50-100 ppb
1999-2003	188	[a]47	-	-		[c]51	-	[c]56	-	[b]34	-
2004	64	18	4	2		19	-	20	1		
2005	105	52	2	2		23	-	20	-	1	5
2006	227	121	4	3	2	49	-	45	1	1	1
2007	32	13	2	-		7	-	10	-		
Total		251	12	7	2	149	-	151	2	36	6

Notes: [a] I sample contained HT2 at a level 10-20ppb
[b] 3 samples contained HT2 at a level between 10-20ppb
[c] No samples contained HT2 >10ppb

Although some data were collected in paired samples, the presence of T2 and HT2 was not sufficiently high to make any assessment of the effect of processing. Nevertheless, looking at the dataset overall, there appears to be a tendency towards higher level in the animal feed co-product stream, which would suggest that the milling process concentrates mycotoxins in this stream. Whilst this would be consistent with observations for other mycotoxins, the data

are not sufficiently robust to quantify this effect. Levels in the human food components (grits and flour) appear to be consistently low.

Conclusions and recommendations

In the view of Euromaisiers members, the data do not at this stage justify the establishment of maximum limits for T2 and HT2 in maize or maize products.
In any event, consumer exposure would appear to be low.

Implementation of existing limits in regulation 1881/2006

Euromaisiers was pleased that, after lengthy discussion in the months after the 2007 mycotoxin forum, the Commission and Member States agreed to revised maximum levels for fusarium mycotoxins in maize and maize products, notably Zearalenone and Fumonisins.

It would appear that the 2007 harvest poses less of a problem for these mycotoxins than the previous years; therefore we have not been able to make a full assessment of the impact of the new regulation in relation to our sector.

There are however a few matters of principle that should be taken into account in any future discussion of these limits:

1. Although data on the effects of processing have been provided over the last few years – and more will no doubt become available in the coming months – the limits established in regulation 1881 do not in fact reflect these data. In general, the regulation over-estimates reductions in mycotoxin levels associated with processing. This means that in order to ensure compliance with the final product limits many manufacturers are specifying maximum levels in their raw materials below those set in the regulation. In a more challenging year, this will cause significant supply problems.

2. The point of control for mycotoxins is in the field and in grain storage. Codes of practice have been developed in order to minimise the risk of fusarium growth and toxin production. However, time is needed for these to be adopted and implemented effectively. Moreover, weather conditions play a big part in the growth of fusarium and formation of mycotoxins. Therefore there will inevitably be a different pattern and risk from year to year.

3. Maize is supplied to the dry milling sector on identity preserved contracts in order to meet customer requirements for non-GMO supplies. Therefore there is little flexibility to switch to an alternative supplier should there be a seasonal problem with mycotoxins. As a result, there has been a cost increase for the sector associated with the new regulation, in addition to the cost of testing, rejection etc. This cost increase would be still greater in more difficult years.