GRAIN TRADE AUSTRALIA

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DISCUSSION PAPER ON AFLATOXINS IN CEREALS

1. About Grain Trade Australia

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain.

GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules.

GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, human and stock feed milling.

GTA also attracts membership from organisations to the side of the value chain in related commercial activities such as financial (banking, stock exchanges etc), communications, grain advisory services, and professional services (e.g. solicitors and accountants).

Within this context, GTA provides comment on the abovementioned document.

2. General Comments

a. Aflatoxins in Australian Exports

Aflatoxins in general are arguably the most widely named mycotoxin in trading contracts for cereals exported from Australia. Generally most cereals contracts specify a limit for Aflatoxins in total, although reference may be made to specific Aflatoxins such as B1, B2, G1 and G2.

As no international limits for Aflatoxins in cereals exist at the Codex level, contracts either specify limits set by the importing country Government or a level set by the importer based on a range of factors.

While weather impacts may adversely affect the quality of the Australian crop, Australia is fortunate that the incidence of mycotoxin contamination of cereal exports is generally low. Other than maize and sorghum, there is a relatively low risk of the presence of Aflatoxin in many of the main cereals exported.

Exporters of Australian grain rely on rigid quality standards to maintain the integrity of the exported crop combined with best management practices for the storage and handling of cereals. These standards and practices assist to minimise the potential presence of mycotoxins such as Aflatoxin in exported grain.

Nevertheless, there are instances where Aflatoxins have been detected in the harvested grain, requiring the Australian supply chain to implement measures to meet relevant contractual specifications and ensure the grain exported meets the market requirement for "fit for consumption". To assist in these instances, industry implements sampling and testing programs to determine the presence and levels of any mycotoxins that may be present.

In addition, measures as outlined in various reference materials may also be undertaken, including the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003).

b. Recommendations

1. The discussion paper reaches its conclusions based on data from 48 countries. Australian data is not included in that analysis. As Australia is a large exporter of cereal grains, it is recommended that Australian data is reviewed to determine the impacts of any potential Maximum Levels (MLs) that may be considered or adopted by Codex on Australian exports.

2. While processing has been shown to have an impact on reducing mycotoxin levels in the finished product, this is frequently not reflected in the contractual specifications required to be met in export cargoes. Should a limit be set for example for a wheat fraction such as flour, this would be expected to be specified in the contract for the exported whole wheat grain. Therefore it is important that any limits set reflect supply of the whole grain. We note the discussion paper does not include data on processed food.

3. The data in the discussion paper indicates, and is verified by previous sampling and testing programs conducted by individual companies in Australia, that different cereals have a greater or lesser risk of contamination with mycotoxins such as Aflatoxin. It is essential that any MLs developed internationally at Codex reflect the risk of contamination and any food safety concerns. It is recommended that MLs be set for individual cereal grains. Adopting a single limit for all cereals based on the "highest risk grain" may unnecessarily restrict trade in those cereal grains where limits may reasonably be set at a higher level due to a lesser food safety concern.

4. Determining the level of mycotoxin contamination in a parcel of grain is problematic. Mycotoxins, including Aflatoxins are often not homogenous throughout the grain parcel and representative sampling is often difficult. In addition, prior experience in Australia is that extensive sampling and testing may only occur when the risk of contamination or presence of Aflatoxin is considered or known to be high. This data may therefore not represent the "normal level of Aflatoxin in each cereal commodity in Australian exports". Note that the data in the discussion paper may also be similarly distorted.

5. The two recommendations of the discussion paper are supported, requiring the collection and provision of further raw data to determine the mycotoxin status on cereal products worldwide.

6. It is recommended that Australian data is collected and provided to assist in the analysis and development of any future MLs. GTA will assist in this task where possible. The Grains Research and Development Corporation may also be of assistance in this regard. Data could be obtained from a range of sources, including Government testing (e.g., National Residue Survey or Market Basket Surveys), individual companies and industry associations on behalf of its members. It should be noted that other industry organisations should also be approached to obtain any data on specific commodities, such as:
    a. Maize Industry Association for maize
    b. SunRice for rice

    As there are a number of commercial and Government interests in maintaining the integrity and validity of that data, it is recommended that Government assist in the compilation and analysis of that data on behalf of industry.

7. While Codex may choose to pursue development of MLs, individual exporters will continue to sample and test grain for mycotoxins such as Aflatoxins as required in order to meet commercial trade specifications. Sampling and testing will be done by commodity through risk profiling of markets based on the real versus perceived risk by commodity. GTA considers that there is a need for ongoing information sharing with Government for Codex discussions, potentially setting Australian standards and industry in general to understand the risks for feeding to livestock or exporting cereals. The potential exists to develop a central database provided data was confidential, the meaning behind the data was fully transparent (i.e., targeted programs means that results may not be representative of the crop) and all industry contributed. We look forward to further discussions on this topic to address the effective and ongoing input of the Australian industry into developing Australia's position on this item in future.

3. Specific Comments

There are no specific comments on the document.

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Sincerely
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