GRAIN TRADE AUSTRALIA

Grain Trade Australia Limited
PO Box R1829 Royal Exchange NSW 1225
Phone: +61 2 9235 2155 Fax: +61 2 9235 0194
Email: admin@graintrade.org.au Web: www.graintrade.org.au

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOOD

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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, grain for the human consumption and stock feed milling industries.

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 for consideration by Codex Australia on various documents to be tabled at the CCCF meeting in April 2014.

2. PROPOSED DRAFT ANNEX FOR THE PREVENTION AND REDUCTION OF AFLATOXINS AND OCHRATOXIN A CONTAMINATION IN SORGHUM (CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF MYCOTOXIN CONTAMINATION IN CEREALS (CAC/RCP 51-2003)) (AT STEP 4) CX/CF 14/8/10

a) Throughout the Annex, various grammatical errors occur and should be changed for clarity.

b) Paragraph referencing requires altering:
- To reference each paragraph where no numbering exists
- To correctly reference paragraphs (e.g., paragraph 21 incorrectly references itself)

c) Harvest: Paragraph 10 – "*Plants damaged and/or infested by pests should be harvested separately.*
Avoid stacking the harvested produce including the panicle for unduly long periods to prevent fungal growth as spores from panicle will serve as inoculums".

Sorghum grain may be "stacked" in any location or by any means prior to storage for extensive periods without any damage provided the moisture content is within safe levels. To reflect this, the last sentence should be altered to refer to "Avoid stacking ~~the~~ harvested produce with a high moisture content including the panicle for unduly long periods to prevent fungal growth as spores from panicle will serve as inoculums".

3. DISCUSSION PAPER ON AFLATOXINS IN CEREALS CX/CF 14/8/15

a) GTA agrees with recommendations 1, 3 and 4 as listed in the discussion paper, being:

- *Country members should provide additional data to GEMS/Food on AFs, especially for wheat, maize and sorghum. Countries where these cereals are important in their diet are highly encouraged to submit data.*
- *Further work should include additional data on cereal grains and processed commodities provided to GEMS/Food.*
- *The Committee should take into account the annex on aflatoxins that will be included in the Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003) and the proposed revisions to the general part of the Code.*

b) Regarding recommendation 3 "*The Committee should decide whether it is appropriate to start a discussion on a ML for AFs in rice and associate sampling plan or wait until a larger database is available for considering whether MLs are needed for all cereals*":

    - To re-iterate previously supplied comments, GTA recommends MLs be considered for individual cereal grains. Therefore we recommend that in the absence of a sufficiently large database on each cereal, the committee commence review of the data supplied on rice to determine if the data is sufficient to develop an ML and sampling plan.

4. DISCUSSION PAPER ON THE POSSIBLE REVISION OF THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF MYCOTOXIN CONTAMINATION IN CEREALS (CAC/RCP 51-2003) CX/CF 14/8/14

a) In general GTA supports the revisions made to the discussion paper.

b) Harvest – paragraph 17 "*Containers (e.g., wagons, trucks) to be used for collecting and transporting the harvested grain from the field to drying facilities, and to storage facilities after drying, should be clean, dry and free of old grain, grain dust, insects and visible fungal growth before use and re-use*".

This paragraph should be altered to reflect that harvested grain may be transported from the field direct to storage without the need for or undergoing drying. Suggested wording is "*Containers (e.g., wagons, trucks) to be used for collecting and transporting the harvested grain from the field to storage facilities, from the field to drying facilities~~,~~ and to storage facilities after drying, should be clean, dry and free of old grain, grain dust, insects and visible fungal growth before use and re-use*".

5. PROPOSED DRAFT MAXIMUM LEVELS FOR ACETYLATES DERIVATIVES (DON) IN CEREALS AND CEREAL-BASED PRODUCTS CX/CF 14/8/8

a) The GTA position as indicated in our response of 2013 has not altered, in that we support the ML for raw cereals (maize, wheat and barley) of 2 mg/kg.

b) We note the lack of data on acetylated derivatives however "*Acetylated DON concentrations typically account for a relatively small fraction (according to the data from Canada and Japan, 10% or less) of the overall DON concentration and would not be expected to have a significant impact on achieving the proposed MLs. As such, based on the low impact on the achievability of the proposed MLs and thus a low impact on trade, it is recommended that the CCCF extend the proposed MLs for DON to include the acetylated DON derivatives.*"

c) On the basis of the information provided in the discussion paper, we support extending the DON MLs to include acetylated DON derivatives. Note that grain contracts do not stipulate a distinction between DON and its derivatives.

d) However, for scientific validity, we do not oppose waiting to consider extending the MLs for DON to include the acetylated DON compounds until additional data is collected and evaluated for various commodities.

6. CX/CF 14/8/9 Proposed Draft Maximum Levels for Fumonisins in Maize and Maize Products and associated sampling plans

a) As an exporter of Australian maize for human consumption to markets such as Japan, Korea, Taiwan and Vietnam the Australian maize industry must adhere to both current domestic and importing countries MLs.

b) Currently Japan and Korea apply an ML of 4ppm for Fumonisin. As these are the main export markets for Australian Human Consumption maize, the implementation of those MLs should be considered.

c) The GTA Prime maize standard (used for human consumption) does stipulate a Fumonisin level of 4ppm. Maize in Australia is generally bought under this standard as it conforms to both the Korean and Japanese requirements. While acknowledging the Codex proposed MLs it would assist trade if the reduced level of 4ppm be considered in deliberations.

d) Additionally, or as an alternative should the proposed ML of 4ppm not be "considered", GTA would seek guidance on the reasoning behind the current Japan and Korean ML with a view to those markets adopting any proposed international ML.

Yours faithfully

Geoff Honey
Chief Executive Officer