

14 March 2014

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON CONTAMINANTS IN FOOD**

**Eighth Session The Hague, The Netherlands, 31 March – 4 April 2014**

**CX/CF 14/8/12 Editorial Amendments to the General Standard for Contaminants and  
Toxins in Food and Feed**

**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 the abovementioned document to be tabled at the CCCF meeting in April 2014.

**2. Discussion Point Page 4, item no.18  
Editorial changes to the provisions on ochratoxin A**

We note *“The views as regards if wheat covers only common wheat or if wheat includes common wheat, durum wheat, emmer and spelt were divergent in the eWG. The majority of views expressed agreed that the ML for “wheat” applies only to raw common wheat.”*

In general terms, wheat may refer to raw common wheat and other commodities such as durum. However in most commercial dealings within the grain industry (i.e., standards, contracts etc) in Australia and when exporting:

- A reference to wheat implies raw common wheat only
- Where commodities such as durum are traded, reference is specifically made to durum

GTA supports the view that “wheat” only applies to raw common wheat. Separate references should be made (with separate MLs as required) to other commodities such as durum, emmer, spelt etc, as differentiated by the genus and species names.

**3. Discussion Point Page 5, item no.21**  
**Editorial changes to the provisions on cadmium**

We agree with the editorial changes for cadmium.

**4. Discussion Point Page 9, section 1.2.2**  
**Definition of contaminant**

We agree with the editorial changes for the definition of a contaminant.

Yours faithfully

A handwritten signature in black ink, appearing to read 'G Honey', is positioned above the printed name.

Geoff Honey  
Chief Executive Officer

