

Vienna, November 28, 2019

**Strict levels for ergot alkaloids from 1 July 2020
with a further reduction of the levels from 1 July 2022:**

**POSITION PAPER of the Federal Wholesalers Association (grain, seed and feed)
and the Austrian Association of Food Crafts**

At European level, a draft by the EU Commission is currently discussing possible maximum levels for ergot and ergot alkaloids in unprocessed cereal grains and flour-based products. In the new draft, the future levels for wheat and spelt products will be, for the first time, differentiated over ash content and two binding maximum levels for the EU-wide implementation will be set from July 1, 2020 and July 1, 2022, with a further significant reduction of the limit values.

Internal quality controls at Austrian grain traders and flour mills already show a clear challenge in dealing with ergot alkaloids, despite meticulous compliance with good hygiene practice (GHP) guidelines and the application of HACCP principles in flour mills (*Austrian Decree BMGFJ-75220/0007-IV / 7/2008*).

“The **European Grain Monitoring**”, conducted by the European Flour Millers, also **shows regional differences**. Furthermore, climatic conditions, agricultural factors and weather-related influential factors play a significant, and not-to-be underestimated role for the occurrence of ergot alkaloids and these can naturally be different in each crop year.

Other **current studies** (e.g. *Max-Rubner Institute in Detmold, KWS Lochow GmbH, Austrian Agency for Health and Food Safety Ltd.*) **show** that the **toxicity** of ergot sclerotia in the presence of alkaloids in ergot also **varies widely**. We would like to emphasize that no correlation between ergot sclerotia and their alkaloid contents has been found so far. For grain traders and flour mills, this means that, even if they are using “good professional practice” in grain intake and state-of-the-art cleaning technology (*Recommendations of the Max Rubner Institute in Detmold for minimizing ergot sclerotia and ergot alkaloids in dialogue with the grain value chain*), it can hardly be guaranteed that the required alkaloid level in grain or flour will be met in the future. In addition, there are currently no rapid tests for alkaloid measurements in cereals available that could be used at the grain intake.

Out of these considerations, the **Federal Wholesalers Association (grain, seed and feed) and the Austrian Association of Food Crafts**, as well as the **Bavarian Muellerbund e.V.**, **vehemently oppose to fixing for even lower levels of ergot sclerotia and ergot alkaloids** in unprocessed cereal grains and cereal milling products. The implementation of the proposed maximum levels from July 1, 2020 means facing serious difficulties, as these levels cannot be observed with the necessary degree of certainty using the available technical possibilities. As a result, the levels starting from July 1, 2022, are simply impossible to meet.

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