

DRAFT EC REGULATION - AFLATOXIN CONTROL

Submission by Brazil

The following communication was received from Brazil on 18 February 1998.

Comments from Brazil on Aflatoxin

1. In order to safeguard the health of consumers, Brazil reviews, when the case so warrants, the maximum levels of aflatoxin. These revisions are invariably based on sufficient scientific evidence and are conducted in such a way as to avoid turning a legitimate and justifiable concern with public health into an illegitimate and unjustifiable barrier to trade.
2. The EC measure, which intends to reduce the maximum limit of aflatoxin to 10 micrograms per kilo, seems based on insufficient scientific evidence and, as such, could result in an unjustifiable barrier to trade. The following should be stressed: the lack of sufficient data to justify the alleged benefit to the consumer as a result of the reduction of maximum levels of aflatoxin currently allowed in foodstuffs and (ii) the inadequacy of the statistical data utilized by the European Communities concerning the potential cancer hazard of aflatoxin. In this respect, it should be pointed out that, although the EC interest in combatting cancer may be legitimate, aflatoxins cannot be singled out as the only source of cancer, a disease with multiple origins.
3. The sampling methods proposed by the European Commission do not represent a favourable alternative to the consumer compared with the methods adopted by FAO. They may, consequently, entail higher processing costs for exports to the European Communities.