



Communiqué on Alternaria

June 2023

TomatoEurope, the federation regrouping the European tomato processors, has been since its existence continuously striving to make the most qualitative tomato products while applying the highest phyto-sanitary requirements. The members of TomatoEurope are hence committed to deliver healthy and thoroughly verified products devoid of any possible harmful effects to human or animal health.

In this spirit, TomatoEurope applies uncompromising vigilance when it comes to the possible presence of contaminants in its products. This is certainly the case for the levels of the much-debated **Alternaria toxins** in tomato-based processed products. Nevertheless, in spite of this strong commitment and the clarification made by **Recommendation (EU) 2022/553 of 04/05/22**, it is true that difficulties persist in the relationship with our customers, especially German and organic customers, now mainly for media reasons.

We sincerely regret this especially given that Recommendation 2022/553 establishes only 'Indicative Levels' for these toxins (not corresponding to food safety levels). Beyond this point, only investigations should be carried out on the factors determining the presence of Alternaria toxins or on the effect of the transformation of foods, which for us obviously means the effect of concentration (Processing Factors)¹. These indicative levels should be applied while considering the significant differences in concentration among them.

As such, a lot of concerns could be dispelled based on this Processing Factor which should be considered when applied to final processed products versus fresh tomato products. In the General Assembly of our European Organization (TomatoEurope) on 11 May 2023, all the delegates thus agreed to appeal to the processing companies in all EU countries not to commercially accept mandatory limits for Alternaria toxins, because they are absolutely not justified and justifiable.

Moreover, it should be mentioned that the monitoring Recommendation invites Member States, with the active participation of Food Sector Operators (FBOs), to monitor the presence of Alternaria toxins also in processed tomato-based products and to send the results of the monitoring activities to EFSA by 30th June each year. Consequently, our industry is committed to apply the aforementioned recommendations and fully collaborates with the European food safety authority. Hence, data collection action is in progress at European level.

¹ Processing factor (Pf): Calculated as the ratio of the residue concentration in the processed product and the residue concentration in the relevant unprocessed product covered by Annex I using the residue definition for enforcement given in Regulation (EC) No 396/2005.

Therefore, in the case of Italy, on June 8, 2022, Anicav representatives met directors from the Italian *Istituto Superior di Sanità* and the Ministry of Health, to whom TomatoEurope presented the results of the analyses of the 2021 crop. This is the report made on that occasion by the Ministry of Health:

The trade association represented some critical issues encountered before the EU recommendation 2022/553 and related to the distorted use of the indicative limits by other Member States. On the merits, it was clarified that these are indicative levels, not safety levels, the exceeding of which only implies carrying out investigations in order to understand the cause of the contamination. The Association has also communicated that it has undertaken a collaboration with universities in order to understand the origin of these toxins, as well as that it has data collected in the past and transmitted to EFSA, with LOQ (limit of quantification) values different from those indicated in the recommendation, which it intends to make available to the Ministry/Higher Institute of Health. In conclusion, the Association intends to undertake monitoring for different types of tomato processing (conventional and organic production) and to make these data available to the Ministry/ISS. In the same way, the Association will make the relative transformation/processing factors available. In support of the sampling, the Ministry has undertaken to provide the draft revision of the EC regulation 401/2006, which will be discussed on June 15th. Consequently, during the 2022 season the Italian associations have collected data from more than 1,300 analyses at most Italian companies, both private and cooperative, data that we will enter into the EFSA database by June. Anicav and ConfCooperative presented these data to the Ministry of Health on March 15th 2023.

From the analysis of the 2022 dataset, the following considerations have emerged: (1) *the use of Processing Factors would lead to a significant reduction in the percentage of observed cases compared to the indicative levels of Recommendation 2022/553*; (2) *the products with the highest incidence of toxin contamination are concentrated in double concentrate paste and tomato puree (clearly due to the higher concentration)*. However, more information needs to be gathered on other types of products² and (3) *there was a greater incidence of contamination by Alternaria toxins on organic products*. This information has been shared with European associations and stakeholders.

In consequence, we at TomatoEurope have an unwavering commitment to produce safe and healthy processed tomato products. In recent years, the discovery of Alternaria variants contaminants has naturally increased our vigilance on food safety matters. In this respect, we are fully cooperating with European and national food safety agencies in scientific data collection as well as analyses and benchmarking. In this latter instance we want to emphasize again that the EU has not issued any safety levels and that any LOQ³ or LMR should be counterbalanced with the well-known correct Processing Factors. Although, as research indicates, the processing of tomatoes actually decreases exposure to Alternaria variants, we will continue to work with the best technical and scientific solutions to reduce in the future any positive incidences to zero.

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² With a lower set of concentration we still need to carry out further research.

³ LOQ is the limit of quantification and LMR *limites maximales de résidus* or maximal residual limits.