KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ

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Konu : Alternaria Toksinler ile İlgili Olarak Frucom Tarafından AB Komisyonuna Gönderilen Mektup (Fındık ve Mamulleri)

E-POSTA

KARADENİZ İHRACATÇI BİRLİKLERİ ÜYELERİNE SİRKÜLER
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İlgi: 04/04/2025 tarih 2025/216 sayılı sirkülerimiz.

Sayın üyemiz,

Bilindiği üzere, gıdalarda alternaria toksinlerinin mevcudiyetinin takip edilmesine yönelik olarak AB Komisyonunun 2022/553 sayılı öneri kararı 06/04/2022 tarihli AB Resmi Gazetesinde yayımlanarak konuya dair sektör paydaşları tarafından elde edilen dataların paylaşılması tavsiye edilmiş ve söz konusu öneri kararında, fındığının da dahil olduğu Tree Nuts kategorisine yönelik sadece Tenuazonic Acid (TeA) için 100 µg/kg gösterge limiti belirlenmiştir.

Öte yandan, AB'nin ilgili mevzuatında Alternaria Toksinler için halihazırda belirlenmiş bir maksimum limit bulunmamakta olup, belirlenecek maksimum limitin sektöre zarar vermemesi için FRUCOM tarafından yürütülen çalışmalara Birliğimizce de destek verilmektedir. Bu bağlamda, 04/04/2025 tarih 2025/216 sayılı sirkülerimiz ile üyelerimizden elde edilen veriler ve görüşlerimiz FRUCOM ile paylaşılmıştır.

Hal böyle olmakla beraber, Tenuazonic Acid (TeA) açısından AB'nin belirttiği gösterge limitinin üstünde olması nedeniyle 2025 yılı başından itibaren toplam 4 Türk fındığı partisinin RASFF bildirimine konu edildiği de bilinmektedir.

Bu bağlamda, yürüttükleri veri toplama süreci sonrasında FRUCOM tarafından AB Komisyonuna gönderilen öneri mektubu ve elde edilen analiz sonuçlarının yer aldığı tablo ilişik bulunmaktadır. İncelendiğinde de görüleceği üzere, FRUCOM tarafından, **fındık özelinde Tenuazonic Acid (TeA) için 1.670 µg/kg** seviyesinde bir maksimum limit uygulanması hususu AB Komisyonuna tavsiye edilmiştir.

Bilgilerinize sunarız.

e-imzalıdır
Sertaç Ş. TORAMANOĞLU
Genel Sekreter

Ek: Frucom Mektubu ve Analiz Sonuçları Tablosu

Analiz Sonuçları Tablosu için lütfen tıklayınız.

Sertaç Ş. TORAMANOĞLU tarafından 5070 sayılı kanun gereğince güvenli elektronik imza ile imzalanmıştır.

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Brussels, 06/August/2025

To: Frans Verstraete, Directorate General for Health and Food Safety
E-mail: Frans.Verstraete@ec.europa.eu

Subject: Proposals for New Indicative Levels for Tenuazonic Acid (TeA) in Sesame Seeds, Tree Nuts and Figs

1. Introduction

FRUCOM represents European traders, importers, agents and brokers across a wide range of agricultural commodities, including dried fruit, tree nuts, oilseeds and processed products. We welcome the opportunity to engage in the discussion of new EU indicative levels for the Alternaria toxin Tenuazonic acid (TeA). Based on the substantial FRUCOM dataset (2019–2025) and the EFSA 2016 Alternaria assessment, we would like to highlight a possible issue with the indicative levels for TeA for three key commodity groups; **sesame seeds**, **tree nuts** and **dried figs**. These thresholds, while intended to protect consumer safety, risk becoming commercially unfeasible. We therefore propose a reassessment of the indicative levels, taking into account our collected occurrence data and the toxicological profile of TeA.

2. Regulatory Context

- **Current Situation:** Current EU values for TeA were based on limited data. In case these levels would become de-facto maximum levels, it would be causing unnecessary trade restrictions.
- **EFSA 2016 Conclusion:** The CONTAM Panel used a Threshold of Toxicological Concern (TTC) approach and concluded that for **non-genotoxic Alternaria toxins (TeA and TEN)**- TTC = 1 500 ng/kg bw per day- "exposure estimates were unlikely to be a human health concern".
- **Limited Data Basis:** It is important to note that the current indicative levels were derived from a relatively small occurrence dataset available at the time.
- **Need for Commodity-Specific Levels:** The FRUCOM dataset (2019–2025) includes extensive TeA measurements for sesame seeds, tree nuts, and dried figs, showing that many results exceed current indicative levels. These indicative levels, based on limited data, risk unjustly penalising products that pose no realistic health risk. While this does not in itself justify higher limits, it highlights the need for a full risk assessment, incorporating toxicology and consumption data, to determine whether revised, commodity-specific levels are warranted and proportionate.

3. FRUCOM Data Overview

-Total Data Points (2019–2025): 1 545 Alternaria analyses of which 712 were TeA measurements.

-Samples by Commodity:

- **Sesame seeds:** 66 total (21 quantified, ≈ 32 %)

- **Tree nuts:** 173 total (104 quantified, ≈ 60 %)
  - Hazelnut: 152 (94 quantified, ≈ 62 %)
  - Almond: 71 (1 quantified, ≈ 1 %)
  - Pistachio: 30 (9 quantified, ≈ 30 %)
- **Figs (dried):** 39 total (20 quantified, ≈ 51 %)

4. Human Health Considerations (EFSA 2016)

In its 2016 opinion, EFSA's CONTAM Panel applied a TTC of 1 500 ng of TeA/kg bw per day, on the basis that TeA is non-genotoxic, and concluded that even for vulnerable groups, such as toddlers at the 95th percentile of intake based on data from the EFSA (5.9g/day hazelnuts, 12.09g/day figs for toddler), Comprehensive European Food Consumption Database, the exposure remains below or very close to this TTC. "Normal dietary pattern" in this context refers to actual consumption patterns recorded in national dietary surveys compiled in the EFSA Comprehensive Database, which includes data from over 90 000 individuals across EU Member States. In practical terms, raising the indicative levels for sesame seeds and tree nuts would not drive consumer exposure near the TTC, but would better reflect the naturally occurring and commodity-specific background presence of TeA as evidenced in the FRUCOM dataset, a representation that accounts for natural variability and practical detection limits rather than idealised thresholds. This adjustment would help avoid unnecessary product rejections or market withdrawals without compromising consumer safety.

However, the 90th-percentile level of 4 700 µg/kg for dried figs cannot exclude the possibility of exceeding the TTC, particularly for high-consumption toddlers, where theoretical exposure could approach three times the safe intake. While this cannot exclude the possibility of a health risk, it may be preferable to grant additional time for a refined exposure assessment and the development of targeted risk-mitigation strategies, rather than trigger immediate market recalls.

5. TeA Concentration Distributions, 90th and 95th Percentiles FRUCOM data

Commodity	n (TeA samples)	Median (µg/kg)	Mean (µg/kg)	Current Indicative Level (µg/kg)	Exceedance of the Indicative Level (%)	90th Percentile (µg/kg)	95th Percentile (µg/kg)
All TeA samples	712	218.0	1012.8	-	26.7	-	-
Sesame seeds	76	57.4	90.5	100	28.0	156.4	195
Tree nuts	337	185.9	697.7	100	30.9	1500	4900
-Hazelnut alone	221	285	833.3	100	42.5	1670	4900
-Almond alone	82	14.2	67.9	100	1.2	56.4	120
-Pistachio alone	34	110	187.3	100	26.5	359.6	-
Figs (dried)	112	1400.0	2384.0	1 000	56.3	4729	7040

6. Advantages of the 90th-Percentile Approach

Adopting the 90th-percentile thresholds ensures consumer safety while allowing most lots to stay on the market. For producers, sesame seeds at 160 µg/kg mean that roughly 72% of lots avoid unnecessary recalls. The current indicative level for tree nuts should be revised for hazelnuts and pistachios; regarding almonds, there are no issues related to the current indicative level. However, these values must be evaluated

alongside typical consumption volumes to confirm whether they pose any real risk. By publishing a clear, data-driven 90th-percentile indicative level, the EU would ensure both food safety and market stability. In the case of dried figs, we are proposing the 90th percentile and that EU would investigate this issue further.

7. Fungal Activity and Best Practices

Alternaria fungi are found in soil and on crops worldwide and tend to proliferate under warm, humid conditions, posing particular challenges for food produced in hot and humid climates. This is the case for figs, sesame seeds and tree nuts. To mitigate contamination, the industry should adopt best practices, including:

- Strict field hygiene and crop rotation to reduce soil-borne inoculum.
- Optimised harvest timing and rapid drying to minimise fungal growth.
- Controlled storage environments with low relative humidity and temperature.
- Regular monitoring of moisture levels and routine mycotoxin testing along the supply chain.

7. Recommendations

FRUCOM respectfully asks the Commission to:

1. **Adopt the 90th-Percentile TeA Levels:**
    - Sesame seeds: 160 µg/kg.
    - Tree nuts, except hazelnuts: 1 500 µg/kg.
    - Hazelnuts: 1 670 µg/kg.
    - Figs (dried): 4 700 µg/kg.

Conclusion

Based on robust FRUCOM occurrence data (2019–2025) and the EFSA CONTAM Panel's finding that TeA exposures are unlikely to present a human health concern at normal consumption levels, FRUCOM would propose the 90th-percentile TeA indicative levels of **160 µg/kg** for sesame seeds, **1 500 µg/kg** for tree nuts, **1 670 µg/kg** for hazelnuts and **4 700 µg/kg** for dried figs. These thresholds strike the appropriate balance between protecting public health and preserving commercial viability for European producers and importers in the case of sesame seeds, tree nuts and hazelnuts. For dried figs, this level would give industry time to figure our best practices, the authorities time to assess Alternaria toxins more in detail and avoid market disruptions.

We stand ready to provide any further information or clarification.

Sincerely yours,

Anna Boulova

FRUCOM Secretary General