

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

## Agenda Item 12

### JOINT FAO/WHO FOOD STANDARDS PROGRAMME

#### CODEX ALIMENTARIUS COMMISSION

##### *Thirty-first Session*

*International Conference Centre, Geneva (Switzerland), 30 June - 4 July 2008*

#### **MATTERS ARISING FROM THE REPORTS OF THE COMMISSION, CODEX COMMITTEES AND TASK FORCES**

**Matters Arising by 15 March 2008**

#### **I. MATTERS FOR ACTION BY THE COMMISSION**

##### THE 29<sup>TH</sup> SESSION OF THE CODEX ALIMENTARIUS COMMISSION

##### **Future Work on Animal Feeding <sup>1</sup>**

1. The 29<sup>th</sup> Session of the Commission agreed to defer its discussion on the timing and the work of the future Task Force on Animal Feeding until 2008. It also agreed that a Circular Letter asking proposals for new future work by Codex, preferably in the form of project documents, and information on the national experience in the implementation of the Code of Practice on Good Animal Feeding be issued after the 30<sup>th</sup> Session of the Commission in 2007 in order to allow further consideration of the issue at the 31st Session of the Commission.
2. In July 2007, a Circular Letter<sup>2</sup> was issued in order to request for proposals for future work by Codex on animal feeding and information on the national experience in the implementation of the Codex Code of Practice in Good Animal Feeding.
3. Comments were received from Canada, Czech Republic, European Community, Iran, Norway, United States of America, FEFAC, IFAH and IFIF. These comments are presented in the Annex to this document.
4. The Commission is hereby requested to determine, in the light of the comments received, whether new work is necessary in the area of animal feeding.

<sup>1</sup> ALINORM 06/29/41, paras 170-174

<sup>2</sup> CL 2007/19-CAC.

## THE 39<sup>TH</sup> SESSION OF THE CODEX COMMITTEE ON FOOD HYGIENE (CCFH)

### **The Use of the Lactoperoxidase System for Milk and Milk Products in International Trade<sup>3</sup>**

5. The 19<sup>th</sup> Session of the Commission adopted the Guidelines on the Use of the Lactoperoxidase System for Milk and Milk Products in International Trade (CAC/GL 13-1991) at Step 8 and **agreed to emphasize** that the lactoperoxidase system should not be used for products intended for international trade and should never be used a substitution for refrigeration.
6. The 27<sup>th</sup> Session of the Commission adopted the draft Code of Practice for Milk and Milk Products at Step 8, with the amendment to add the following text to the end of footnote 9 of Appendix II of the draft Code: “The use of the lactoperoxidase system for milk and milk products in international trade will be reexamined by the Committee on Food Hygiene (CCFH) after completion of an expert review by FAO and WHO of available data and considering the FAO Lactoperoxidase Expert Group report about potential risks and benefits of lactoperoxidase system. CCFH will then review the issue in 2006”.<sup>4</sup>
7. The 38<sup>th</sup> Session of the Committee reexamined the issue based on the conclusions and recommendations by the FAO/WHO expert meeting on the benefits and potential risks of the lactoperoxidase system of raw milk preservation. However, noting that there was no consensus on the removal of restriction on the use of the Lactoperoxidase System in milk and milk products intended for international trade, the Committee decided to refer this matter to the Commission for guidance on how to proceed.
8. The 30<sup>th</sup> Session of the Commission, in view of the diversity of views and lack of consensus, agreed to refer the matter back to the Committee and to request, by Circular Letter, government comments that would facilitate the identification of additional information regarding the potential risks in respect of the lactoperoxidase system, for consideration by the Committee.
9. The Committee agreed to inform the Commission that it had considered further new information, but could not reach consensus on the lifting of the restriction. However, the Committee noted the value of the system, particularly in developing countries and in those situations where technical, geographical, economical and/or practical reasons do not allow the use of refrigeration. Therefore, the Committee requested that the Commission should consider clarifying the statement regarding the restriction of the use of the LPS to explain that the restriction on the use of the LPS for milk in international trade in no way precluded the use of the system by countries at the national level.
10. The Commission is hereby invited to consider the request by the CCFH to clarify the statement regarding the restriction of the use of the LPS and to explain that the restriction on the use of the LPS for milk in international trade in no way precludes the use of the system by countries at the national level.

## **II. MATTERS FOR INFORMATION TO THE COMMISSION**

### STRATEGIC PLAN 2008-2013 OF THE CODEX ALIMENTARIUS COMMISSION

11. Several Committees had reviewed the Strategic Plan 2008-2013 adopted by the 30<sup>th</sup> Session of the Commission, in particular the relevant Activities in Part II “Programme Areas and Planned Activities 2008-2013”, and provided comments and/or observations as follows.

#### ***The 17<sup>th</sup> Session of the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF)<sup>5</sup>***

12. The Committee drew its attention to Activities 1.1, 1.6, 2.2, 2.3 and 3.3 of the Strategic Plan 2008-2013, which identified the CCRVDF as one of the responsible parties for implementation.

---

<sup>3</sup> ALINORM 08/31/13, paras 173-180

<sup>4</sup> ALINORM 04/27/41, paras 45-46.

<sup>5</sup> ALINORM 08/31/31, para. 9

13. With regard to Activity 3.3, the Committee noted that this Activity required that decision making and priority setting criteria be completed by 2008 and agreed to refer to the Executive Committee and the Commission the outcome of its discussion under Agenda Item 8 “Priority List of Veterinary Drugs Requiring Evaluation or Re-evaluation”<sup>6</sup> and Agenda Item 10 “Discussion Paper on Risk Management Topics and Options for the CCRVDF”<sup>7</sup>.

***The 39<sup>th</sup> Session of the Codex Committee on Food Hygiene (CCFH)***<sup>8</sup>

14. The Committee noted that assignments given by the Commission in relation to the implementation of the Strategic Plan 2008-2013 of the Codex Alimentarius Commission such as the review and development of Codex standards and related texts for food safety was ongoing work; or the development of committee-specific decision making and priority setting criteria had already been successfully completed and was used in practice by the CCFH and that Activity 2.2 Review of risk analysis principles would need to be completed by 2013.

***The 29<sup>th</sup> Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)***<sup>9</sup>

15. The Committee noted that assignments given by the Commission in relation to the implementation of the Strategic Plan 2008-2013 of the Codex Alimentarius Commission such as the review and development of Codex standards and related texts for food safety was ongoing work and that Activity 2.2 Review of risk analysis principles would be taken on Item 7 while considering the elaboration of application of risk analysis principles by the Committee on Nutrition and Foods for Special Dietary Uses.

***The 16<sup>th</sup> Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS)***<sup>10</sup>

16. The Committee noted that the Commission had adopted the Strategic Plan 2008-2013 and that activities 1.4, 2.5 and 3.3 were relevant to the work of the Committee.

***The Eighth Session of the Codex Committee on Milk and Milk Products (CCMMP)***<sup>11</sup>

17. The Committee noted that Activities 1.1, 1.2, 2.5, 3.3, 4.1, 5.5 and 5.6 of the Strategic Plan 2008-2013 identified the CCMMP as one of the responsible parties for implementation.

***The 29<sup>th</sup> Session of the Codex Committee on Fish and Fishery Products (CCFFP)***<sup>12</sup>

18. The Committee noted the Activities 1.1, 1.2, 2.5, 3.3, 4.1, 5.5 and 5.6 of the Strategic Plan 2008-2013, and in particular noted that the assignments given in relation to the implementation of the Strategic Plan such as the review and development of Codex standards and related texts for food safety and for food quality were ongoing work.

***The 29<sup>th</sup> Session of the Codex Committee on Methods of Analysis and Sampling (CCMAS)***<sup>13</sup>

19. The Committee noted that Activities 1.4, 2.5, 3.3, 4.1, 5.5 and 5.6 of the Strategic Plan 2008-2013 were of specific relevance to the Committee.

---

<sup>6</sup> ALINORM 08/31/31, paras 83-94 and Appendix VII

<sup>7</sup> ALINORM 08/31/31, paras 127-136

<sup>8</sup> ALINORM 08/31/13, para. 8

<sup>9</sup> ALINORM 08/31/26, para. 8

<sup>10</sup> ALINORM 08/31/30, para. 7

<sup>11</sup> ALINORM 08/31/11, para. 9

<sup>12</sup> ALINORM 08/31/18, paras 10-11

<sup>13</sup> ALINORM 08/31/23, para. 7

## REVIEW OF CODEX COMMITTEE STRUCTURE AND MANDATES OF CODEX COMMITTEES AND TASK FORCES

20. The 30<sup>th</sup> Session of the Commission considered 11 Proposals as contained in Circular Letter CL 2006/29-CAC. The Commission:

- agreed to invite Codex committees to consider adopting a longer inter-session interval with the understanding that a structured, effective inter-session working mechanism should then be put in place in accordance with the Guidelines on Physical Working Groups and on Electronic Working Groups (*Proposal 3* (interval of meetings))<sup>14</sup>; and
- agreed that the duration of a Codex session should be kept within seven days, including the pre-session meetings of working groups, if any, in order to keep its proceedings well focused, ensure transparency, and facilitate effective participation of the members, with the understanding that a certain margin of flexibility should be allowed, depending on the workload of each subsidiary bodies (*Proposal 4* (duration of meetings))<sup>15</sup>.

21. Several committees considered these decisions of the Commission as follows.

### ***The 17<sup>th</sup> Session of the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF)***<sup>16</sup>

22. The Committee noted that the decision made by the Commission on Proposal 3 (interval of meetings) and Proposals 4 (duration of meetings) would be taken into account when considering Agenda Item 12 “Date and Place of Next Session”.

### ***The 39<sup>th</sup> Session of the Codex Committee on Food Hygiene (CCFH)***<sup>17</sup>

23. The Committee accepted the proposal of the Chairperson and agreed that, if the Committee retains five substantial items on its agenda, to hold five day meetings instead of six.

### ***The 16<sup>th</sup> Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS)***<sup>18</sup>

24. the Committee briefly discussed the possibility of adopting a longer interval of meetings. The Committee noted that under the current arrangements CCFICS had worked efficiently and effectively since its establishment. Some delegations expressed concern that a longer interval could lead to a proliferation of physical working groups which could be difficult to attend especially by delegations from developing countries. The Delegation of Australia, as host country to the CCFICS, explained that the current arrangements were more suitable to ensure the Government’s funding of the meetings. The Committee agreed to conclude this discussion under Agenda Item 10 (Date and Place of Next Session) on the basis of the workload of the Committee.

### ***The Eighth Session of the Codex Committee on Milk and Milk Products (CCMMP)***<sup>19</sup>

25. The Committee was of the view that the current interval and duration of the sessions of this Committee were appropriate.

### ***The 29<sup>th</sup> Session of the Codex Committee on Fish and Fishery Products (CCFFP)***<sup>20</sup>

26. The Committee confirmed that the interval between meetings was suitable and that the next session would take place over 5 days preceded by 2 days for the physical working groups established.

---

<sup>14</sup> ALINORM 07/30/REP, paras 151-154

<sup>15</sup> ALINORM 07/30/REP, para. 155

<sup>16</sup> ALINORM 08/31/31, para. 12

<sup>17</sup> ALINORM 08/31/13, para. 11

<sup>18</sup> ALINORM 08/31/30, para. 8

<sup>19</sup> ALINORM 08/31/11, para. 11

<sup>20</sup> ALINORM 08/31/18, para. 178

ANNEX**Comments Received in Response to CL 2007/19-CAC:****“Request for Proposals for Future Work by Codex on Animal Feeding and Information on the National experience in the Implementation of the *Codex Code of Practice in Good Animal Feeding (CAC/RCP 58-2004)*”**CANADA

Canada is pleased to submit the following comments in response to CL 2007/19-CAC:

With respect to information on the national experience in the implementation of the Codex Code of Practice on Good Animal Feeding, many of the elements in the Codex Code of Practice on Good Animal Feeding were already covered by existing Canadian legislation at the time it was adopted. Since then, Canada has been working on modernizing its animal feed control programs to further enhance human health and food safety.

The most significant change to date was the introduction of enhancements to Canada’s 1997 ruminant feed ban on July 12, 2007. The enhanced feed ban controls for bovine spongiform encephalopathy (BSE) are intended to more quickly eliminate bovine BSE from Canada and include banning the use of specified risk material (SRM, i.e., tissues where BSE is concentrated) in all animal feeds, pet foods and fertilizers, and establishing requirements for recall procedures.

To improve the overall management of veterinary drugs in feed manufacturing, Canada is currently drafting the Medicated Feed Regulations (MFR). The MFR are a set of HACCP-based Good Manufacturing Practices for the manufacture of medicated feeds that will apply to all manufactures of medicated feed. The MFR include the process controls contained in the Codex Code of Practice on Good Animal Feeding, with some additional measures to take account of Canadian requirements.

Canada is also working with the commercial feed industry on the application of HACCP principles for feed manufacturing. Canada has developed a Generic HACCP model and the necessary prerequisite programs, based on the Codex *Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application* (Annex to the International Code of Practice – General Principles of Food Hygiene, CAC/RCP 1-1969, Rev. 4 (2003)), and is currently evaluating a feed industry third party audit protocol.

In relation to future work by Codex on animal feeding, Canada recognizes the work undertaken by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety. Canada supports careful consideration of the recommendations of the meeting as an initial point for discussion to determine if new work is required and whether Codex is the appropriate forum to pursue such work. Should there be a consensus to establish a new Task Force on Animal Feeding, very clear mandate and Terms of Reference will need to be developed.

CZECH REPUBLIC

In elaborating a position on the Codex Alimentarius Commission request, background materials were requested from Competent Authorities in the sphere of feed and animal nutrition (State Veterinary Administration-SVA, Central Institute for Supervising and Testing in Agriculture-CISTA), as well as from scientific institutions and universities. The proposals for a further deepening of activities in the sphere of feed production and safety was built on the **report of the FAO/WHO Expert Meeting “Animal Feed Impact on Food Safety”** (FAO Headquarters, Rome, 8–12 October 2007).

The position of Ministry of Agriculture (MA) with respect to the **Codex Circular Letter CL 2007/19-CAC** contains:

- A) Experience with the application of good practice principles in animal feeding in the Czech Republic in the previous time-period,
- B) The results of monitoring of risk-involving substances in feed and verification of feed materials produced by new technologies,
- C) Proposals for the focusing of activities concerning feed safety and for deepening the principles of practice on good animal feeding CAC/RCP 54-2004.

**AD A)**

The Czech Republic, as a European Union member state, applied the CAC/RCP 54-2004 principles of good manufacturing practice when complying with the requirements of the Regulation of the European Parliament and Council (EC) No. 183/2005, laying down requirements for feed hygiene.

In the previous time-period, farmers and industrial feed producers were informed about the principles of the Code of Practice on Good Animal Feeding and on the Use of Feed for Food Producing Animals (CAC/RCP 54-2004). The Ministry of Agriculture in cooperation with the Agricultural Chamber, Private Farmers' Association, and the Czech-Moravian Association of Agricultural Supply and Purchasing Organisations, and with the specialists of several research institutions, has organised several training events informing farmers and producers about the principles of good practice on animal feeding and GMP and HACCP for the production of compound feed and premixtures.

In 2007, a large GMP and HACCP manual for the production of compound feed and premixtures was published with the support of the MA (The Code of Good Manufacturing and Hygiene Practice for the Manufacturers of Premixtures and Compound Feedingstuffs), as well as the manual for Good Manufacturing and Distribution Practice in Manufacturing and Distribution of Medicated Feedingstuffs, elaborated by the Czech-Moravian Association of Agricultural Supply and Purchasing Organisations (a FEFAC member) – the English version is available at [www.cmsozn.cz](http://www.cmsozn.cz). In cooperation between the MA and the Agricultural Chamber and the Animal Production Research Institute, a manual of good practice for animal feeding and breeding at farms was also published. All of these manuals are based on the principles embodied in CAC/RCP 54-2004, which was published on the MA website.

**AD B)**

The Czech Republic fully complies with EC legislation which set limits as to the contents of undesirable substances in feed, and lay down a list of ingredients whose circulation and use in animal nutrition is prohibited (Directive of the European Parliament and Council 2002/32/EC on undesirable substances in animal feed and Commission Decision 2004/217/EC). In conformity with the Commission's recommendations, competent authorities – the State Veterinary Administration (SVA) and the Central Institute for Supervising and Testing in Agriculture (CISTA) monitor the potential occurrence of an above-the-limit content of undesirable substances in feed, non-authorized prohibited additives (e.g., antibiotics), and prohibited substances, which also include prohibited animal proteins (PAP). Monitoring focuses primarily on the substances and products which represent the greatest potential risk in the Czech Republic or on feed imported from third countries (risk of the occurrence of aflatoxin, Cd, melamine, etc.). If a risk is detected, the RASFF system is used within the EU.

The year's results and evaluation of feed examinations for the presence of residues and contaminants, carried out by the SVA in national monitoring programme according Council Directive 96/23/EC, are available on the official website of the SVA ČR [www.svscr.cz](http://www.svscr.cz).

In monitoring programme and by official controls, the CISTA studies the presence of dibenzo-p-dioxins, dibenzofuran, polychlorinated biphenyls with a dioxin effect, mycotoxins, heavy metals, and organochlorine pesticides in feed. Furthermore, it studies the occurrence of prohibited and undesirable substances. The results of those studies in 2006 and 2007 are shown in the table below:

Parameter	2006		2007	
	Number of samples	Number of non-compliant samples	Number of samples	Number of non-compliant samples
Processed animal proteins	255	2	255	2
Heavy metals (As, Pb, Cd, Hg, F)	80	1	80	0
Persistent organic pollutants	25	0	26	0
Dioxins and PCBs	50	4	60	2
Mycotoxins <sup>+</sup> )	200	0	42	0
Zn and Cu contents in compound feed for pigs	50	4	50	2
Cross contamination (carry-over), prohibited growth promoters	261	1	272	2
<b>Total</b>	<b>921</b>	<b>10</b>	<b>785</b>	<b>6</b>

+ The monitoring of the occurrence of selected mycotoxins in feed focused primarily on checking for the presence of T-2 and HT-2 toxins in feed materials at compound feed manufacturers and in various crops (silage, hay) in primary production. Because no maximum limits have yet been set of T2 and HT2 toxins, the values ascertained serve primarily for data collection. For other mycotoxins (deoxynivalenol, zearalenon, fumonisines B1 and B2 and ochratoxin), so called action levels have been set by the Commission's Recommendation 2006/576/EC.

**In relation to the production of bio-fuel in the Czech Republic**, there is pressure for using the **by-products of that production as feed materials for livestock**. One of the by-products in the production of bio-diesel is **glycerol**. If there is the possible risk of the use of this glycerol in the nutrition of bovine cattle and monogastric animals (as a source of energy), the CISTA took ten samples of glycerol from bio-diesel production plants in the Czech Republic in October 2007. The analysis of these samples, focused on risk-involving substances – methanol, heavy metals, insoluble impurities and methyl esters of oleic acid –, showed that the composition of products from various plants is not balanced and is highly risky due to high methanol content.

In 2008, the CISATA will carry out further targeted checks at bio-diesel production plants, aiming to take some 40 samples of glycerol to verify risk-substance content.

Another feeding ingredient arising from the production of bio-fuel is **dried stillage as a bioethanol production by-product**.

In 2007, the CISTA verified these products in four repeated group comparison tests in the feeding of chicken-broilers and duck-broilers. Dried stillage (dry matter 85.0%, protein 25.1%, ash 3.19%, fibre 14.1%) were included in compound feed at gradating levels, with the maximum contents checked being 15%.

The conclusions of biological testing using dried stillage:

a) In tests in the feeding of chicken broilers, it was ascertained that with the inclusion of dried stillage in the test compound feed BR 1 starter - 3% and 6% and BR 2 finisher - 5% and 10%, a statistically significant increase in live weight occurred in the monitored groups (2<sup>nd</sup> and 3<sup>rd</sup> group), with an index of 117.0 and 116.8. The inclusion of stillage in a BR 1 and BR 2 compound feed in group 4, in the volume of 9% and 15%, showed a depression in growth and feed conversion. **On the basis of these results, the inclusion of dried stillage can clearly be recommended in compound feed for chicken broilers, in the following volumes: for BR 1 (0-14 days old) up to 6% and for BR 2 (15 – 35 days old) up to 10%.**

b) Tests in the feeding of duck broilers showed that the inclusion of dried stillage in compound feed for duck broilers (VKch) for group 3 led to highly statistically significant increases in growth, but only in the category of 0-28 day-old ducks, and in group 4, with 15% of dried stillage, there also was a significant increase in live weight, but again only in the category of 0-28 day-old ducks. In other age categories of ducks, regardless of the volume of dried stillage included, no positive or negative statistically significant results were found. We may logically **infer** that – with a potential further confirmation of the results of this test – **the inclusion of dried stillage of up to 15% could be recommended**. The production efficacy of compound feed have a decreasing tendency with the increasing share of stillage.

c) This June, comparative testing using dried stillage in compound feed for laying hens, which are currently under way, will be completed.

## **AD C)**

### **1. Proposals for the focus of further activities concerning feed safety**

#### a) Risks of contamination

Feedingstuffs contain a number of contaminants and toxins from antropogenous activities and from natural sources. It is important to evaluate the significance of heavy metals, radionuclides, mycotoxins, plant toxins, antibiotics and microbiological pathogenic substances in grain products, complete compound feed and in various crops. Their impact on livestock production and on the safety of products of animal origin must be taken into account.

For example, the assessment of the transfer of chemicals from feed to animal products we can use a transfer factor for the risk-assessment. The risk assessment should be a three-stage process:

(i) It should be based on *literary knowledge* obtained by scientific institutions and on this basis a palette of substances should be identified and supplemented, as well as new feeding products should be monitored.

Not only the transfer of the contaminant itself into animal products should be taken into account, but also the transfer of possible metabolites. Groups of risk-involving contaminants should be identified and defined (e.g., pesticides, hormones - melengestrol, antibiotics – avermectines, tetracyclines, sulphadimethoxin, etc., nitrosamines, and other compounds which do not belong in any of the groups specified).

(ii) The second stage would be represented by the *outcome of contaminants' monitoring in the food chain*, which is carried out by competent authorities (in the Czech Republic: SVA, CISTA, SZPI).

(iii) The third level would include the *assessment of the risk for humans*.

If livestock receives contaminated feed, it would be desirable to estimate what risks their products involve for humans. Given that xenobiotics do not deposit at the same rate in all tissues, there could be an assessment of the “burden” in muscles (meat), entrails/offal (liver, kidneys, etc.), fat, milk (full-fat, skim), and eggs.

*The risk assessment* may be limited due to the absence of relevant information.

#### b) Risks involved in feed materials produced by new technologies

The “Animal feed impact on food safety” expert report (p. 25) mentioned **glycerol** (glycerine) as the by-product of bio-fuel production. In terms of its chemical properties it is a trihydric alcohol. It is generated in the greatest volume as a by-product of the production of methyl ester (bio-diesel, bio-fuel). About 100 kg of raw glycerol are generated in the production of 1,000 kg of bio-diesel. About 40% of the world's production of glycerol is generated in the production of bio-fuel and it is expected that by 2010, its share will grow to 65%, in proportion to the increasing production of methyl ester. These trends in the production of glycerol lead to an increasing problem of its further use. Animal production seems to be one of the promising consumers, where glycerol can be used in high volume as a good high-energy feed material.

In the Czech Republic, a technological process was developed to remedy the present technological shortcomings. This technological process is protected by a Czech patent and patent applications have been submitted in Slovakia and Hungary. Among others, it simplifies and speeds up production and reduces costs due to a quantitative transfer of the KOH catalyser from a reactive mixture to the glycerol layer, with a reduced consumption of catalyser, absence of technological waste water, a fast and quantitative separation of canola oil methyl ester from the glycerine layer, and a rational use of methanol, where non-reacted methanol returns into production without any further treatment.

Attention must be paid to the possibility of feeding glycerine phase and to its standardisation for use as a feed material. It would therefore be purposeful to introduce a harmonised precisely defined process of methyl ester production such that the originating glycerine phase would meet the requirements for use in animal nutrition. The risk of glycerol contamination by residual methanol must be eliminated, as it is the main problem hindering its use as feed.

There are many questions related to the use of glycerol in animal nutrition, on which intensive research should focus, focusing on the assessment of the risk of methanol residues in glycerol from the production of bio-diesel used in feeds, primarily for dairy cows. They must be answered, among others, by animal tests that will include an assessment of the direct and indirect risks (of metabolite residues) that could have a secondary impact on animal health and on the quality or wholesomeness of animal foods.

The Czech Republic expects that given the present possibilities, the results of biological tests of the use of glycerol from the production of biodiesel in the feeding of pigs and dairy cows should be available in 2010-2011. The tests should be carried out by CISTA.

## 2. Proposals for deepening the principles of practice on good feeding CAC/RCP 54-2004.

### a) Managing risks in the use of feed additives in animal nutrition

Presently there is a risk in the Czech Republic as well as in some other Member States and third countries in animal nutrition, of the supply of so-called complementary feeds with high concentrations of certain critical feed additives to primary production (to farmers). These “complementary feed” are practically of the nature of premixtures. They are referred to as the “grey zone”. Their supply as complementary feed for primary production is enabled by missing criteria in EC legislation that could distinguish them from premixtures. Hence legal prosecution (sanctions) of these supplies is difficult. The matter should be resolved by a new EC regulation for marketing feed that is being prepared. The present risk involved in the use of such “feed” in primary



production lies not only in the easy possibility of overdosing and non-homogenous mixing, but also in the carry-over of certain additives which will become an undesirable contaminating element in another kind of animal.

The next CAC/RCP 54-2004 revision should focus on this issue, so that risk management principles in this area could be integrated in good practices on the national level. In essence, such good practices on feeds should replace the application of HACCP principles in primary production.

In the Czech Republic there scientific institutions contribute their knowledge to the elaboration of background materials for risk management and the development of good practices, and also the results of monitoring carried out by competent authorities are taken into account.

- b) Risk of occurrence of undesirable substances, prohibited substances, mycotoxins, PCBs, and similar contaminants in feed

This area is defined in detail by the limits set by the applicable EC legislation, into which belong the monitoring programmes carried out and followed by member states. Provisions have also been set for reducing or limiting risks according to the Commission Recommendation. The Czech Republic participates in them.

In terms of the global application of the CAC/RCP 54-2004 and with a view to international trade in feed, it would be desirable primarily for less-developed areas to recommend the adoption of standard limits applicable in the EU and set by EC legislation.

### **Conclusion:**

In its position elaborated on the basis of a Codex Alimentarius Commission CL 2007/19-CAC request, the Czech Republic built on the Report of the FAO/WHO Expert Meeting October 2007, concerning the issues of the reduction and prevention of risks arising from feed for food production animals. We consider that report to be of a great benefit for ensuring the safety of the food chain and a foundation for further work of competent authorities and scientific institutions.

The Code of Practice in Good Animal Feeding CAC/RCP 54-2004 should be further developed and specialised in parts that would supplement the good practices with the identification and management of risk where it arises, primarily in primary feed production. It would be important to approximate the requirements as to the maximum limits of all undesirable substances and contaminants in feed such as to ensure that their occurrence does not prevent international trade in feed. Those requirements should be contained in new chapters supplementing the present CAC/RCP 54-2004.

In concluding the Czech Republic notes that as an EU member state it supports the EUROPEAN COMMUNITY COMMENTS position presented as the EU response to the Code Circular Letter CL 2007/19-CAC.

## **EUROPEAN COMMUNITY**

### **1. Background**

This document is the European Community response to Codex Circular Letter CL 2007/19-CAC with a request for proposals for future work by Codex on Animal Feeding and information on the national experience in the implementation of the Codex Code of Practice in Good Animal Feeding (CAC/RCP 54-2004) to be considered at the 31st Session of the Codex Alimentarius Commission in July 2008. The deadline for comments is 31 March 2008.

The aim of food standards and other related text adopted by the Codex Alimentarius is to protect consumer health and to ensure fair practices in the food trade. The food chain is becoming increasingly complex. Every part of the chain must be as strong as the others if we want to adequately protect human health. It is essential to assess and monitor the risks to consumer health associated with the use of different feed ingredients as well as those associated with feed processing, feed production and trading practices.

All the food scares and incidents that occur with products of animal origin, and especially those deriving from animal feed, demonstrate that Codex standards should follow a comprehensive and integrated approach throughout the food chain. Feed is an important element in the food chain, and needs to be addressed at the same level as any other elements. The safety of foods of animal origin, their potential risk to consumer health and fair practices in the food trade must be fully considered. There is no internationally uniform legislation or sets of controls in this area. Harmonisation of controls and good practices is to be encouraged and developed.

The Codex Code of Practice on Good Animal Feeding, adopted by Codex in 2004 was a major step in this area and after four years since its adoption and use by Members, it is now desirable to continue this work into other important areas.

In reply to the Circular Letter 2007/19-CAC, the European Community proposes to Codex to undertake work in this area in accordance with the project document described in Annex I.

In addition, the European Community describes experience in the implementation of the Codex Code of Practice of Good Animal feeding both at European Community level and its Member States in Annex II.

**Annex I**

## **PROJECT DOCUMENT**

### **DEVELOPMENT OF SCIENCE BASED GUIDANCE REGARDING ANIMAL FEEDING SUPPLEMENTING THE CODEX CODE OF GOOD ANIMAL FEEDING**

#### **1. Purpose and scope of the proposed work**

The purpose of the work is to develop scientific and technical guidance allowing the development of standards, guidelines, codes or recommendations, as appropriate, for feeds to supplement the Code of Practice of Good Animal Feeding. This focuses on three particular areas, on the basis of scientific evidence, risk analysis and having regard to other legitimate factors relevant to the health of consumers and to ensure fair practices in the food and feed trade.

#### **2. Relevance and timeliness of new work**

The Code of Practice on Good Animal Feeding was adopted by Codex in 2004. The Codex members are implementing this code. The Code of Practice was developed on the basis of an ad hoc Intergovernmental Codex Task Force on Animal Feeding (2000-2004).

During the last few years there has been a substantial increase in the worldwide trade in feeds and feed ingredients, this trend is very likely to continue. Differences regarding feed safety in the international trade and gaps in the current Code of Practice in Good Animal Feeding may result in trade obstacles.

The aim of the future work should be to ensure that such work is in step with other developments in Codex and makes a major contribution to the safety of the feed sector for which other committees have not developed specific standards. The work will focus on the development of additional complementary guidance in the interest of increased feed and food safety, rather than rewriting or updating the current Code.

#### **3. Main aspects to be covered**

- (a) minimisation of the presence of undesirable substances (contaminants) in animal feed:
- to identify known or emerging risks/hazards related to the presence of contaminants which are a risk for human consumers of livestock products in main feed ingredients in international trade
  - to suggest work priorities with regard to specific contaminants. As a starting point, the following non-exhaustive list can be considered: lead, cadmium, arsenic, mycotoxins (aflatoxins, ochratoxin A, ...), dioxins and PCBs.
  - to develop sound methodology for the development of maximum limits for contaminants in feed. This should address e.g. the suitability of the establishment of maximum tolerable levels of intake of contaminants by different animal categories or species in order to ensure that maximum limits in food are not exceeded.
  - to develop new or update existing more specific Codes of Good Practice to minimise or eliminate the presence of specific contaminants in feed complementary to the Code of Practice of Good Animal Feeding;
- (b) to supplement the Code of Practice for Good Animal Feeding to develop guidelines on HACCP (Hazard Analysis and Critical Control Points);
- (c) to develop detailed rules for a global system for exchanges of information in feed control emergency situations or cases of rejection of imported feed. This should focus in particular in the setting of criteria for notification and minimum information required in a notification;

- (d) to develop general principles and guidelines for science based risk assessment and safety criteria of feed ingredients or categories of ingredients;
- (e) when addressing these aspects the work should take full account of, and collaborate with, other Codex committees. In particular for the activities mentioned in letter (a) the work should ensure full collaboration with the Codex Committee on Contaminants in Foods (CX-735) and in particular take into account existing codes of practice such as CAC/RCP 45-1997, CAC/RCP 51/2003 and CAC/RCP 62-2006. As regards the activity mentioned in letter (b), the work should ensure collaboration with the Codex Committee on Food Hygiene (CX-712). As regards the activities mentioned in letter (c), the work should ensure full collaboration with the Codex Committee on Food Import and Export Certifications and Inspection Systems (CX-733). The work should also take full account of and collaborate with other relevant international bodies within FAO, WHO, OIE and IPPC.

#### **4. Assessment against the criteria for the establishment of work priorities in Codex**

- (a) Consumer protection from the point of view of health and fraudulent practices.

The Code of Practice on Good Animal Feeding is a good instrument aimed at improving food safety. Nevertheless, it is not comprehensive and it is desirable to address additional issues in order to strengthen consumer protection and ensure fair trade.

The FAO/WHO expert consultation of October 2007 identified various groups of substances that have a direct impact on human health and for which maximum levels should be considered for substances such as heavy and other metals (e.g. cadmium and lead); toxins (e.g. mycotoxins); dioxins, furans and dioxin-like PCBs. Many of these substances are hazardous because of their high persistence, bioaccumulation and toxicity.

Specific HACCP systems have been designed for the food chain, and the guidelines for implementation of HACCP principles have mainly focused on the food industry. Codex should encourage developments towards the application of HACCP principles along the different steps of the feed chain. Section 4 of the Code of Practice on Good Animal Feeding emphasises the importance of the application of HACCP principles in feed manufacture.

- (b) Diversification of national legislations and apparent resultant or potential impediments to international trade.

As the proposed topics are not included in any international standards, guidelines or recommendations, absence of international harmonisation activity could lead to divergent national standards which might represent undue potential barriers to international trade of feed. Many countries have established limits for the contaminants mentioned above.

This proposed new work would provide internationally-recognized guidance on the areas defined in this scope which national/regional authorities may use. Such internationally-agreed guidance can help to ensure consistent approaches to food safety as regards the specific aspect of feed.

- (c) Scope of the work and establishment of priorities between the various sections of the work.

The scope of the work relates to work previously undertaken by Codex.

- (d) Work already undertaken by other international organisations in this field.

This proposed new work is an extension of work previously carried out by several Codex Committees. It is intended to build and be consistent with work undertaken within WHO, FAO and OIE

#### **5. Relevance to the Codex strategic objectives**

The new work proposed would contribute both to the safety of human health and to ensuring fair practices in the feed trade by satisfying specially the following goals in the CAC Strategic Plan 2008-2013.

- Goal 1: Promoting sound regulatory frameworks.
- Goal 2: Promoting widest and consistent application of scientific principles and risk analysis.
- Goal 3 Promoting cooperation between Codex and Relevant International Organisations.

#### **6. Information on the relationship between the proposal and other existing Codex documents**

The proposed document will fully take into account the provisions in the Code of Practice on Good Animal Feeding. (*CAC/RCP 54-2004*).

The document should address the need to clarify the extension and applicability of the Code of Practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001) to animal feed.

Feed-specific HACCP guidelines will help improve feed hygiene conditions, increase confidence in the food and feed supply chain and reduce barriers to international trade. Often feed materials that are safe *per se* may undergo processing, transport, storage, etc under poor hygienic conditions and become unsafe. The Codex Committee on Food Hygiene (CCFH) only covers in its terms of reference the aspects related to food hygiene; therefore it is wholly justified that the new Task Force should develop minimum standards for feed hygiene. Other committees have stressed the importance of aspects related to feed hygiene in the context of food safety.

The Task Force should perform this task in line with the work already performed by the Codex Committee on Food Import and Export Certification and Inspection Systems (CCFICS), in particular the Guidelines for Exchange of Information between Countries on Rejection of Imported Food and the Guidelines for Exchange of Information in Food Control Emergency Situations. The CCFICS has focused on food, therefore aspects related to feed should be developed by a Task Force in collaboration with CCFICS.

The Task Force should perform this task in line also with the work already performed by the former Codex Committee on Food Additives and Contaminants (CCFAC) in particular in identifying known or emerging risks/hazards related to presence of contaminants which are a risk for human consumers of livestock products.

The proposed document/s will fully take into account the new work being developed by the Task Force on Antimicrobial Resistance (TF AMR) if endorsed by the CAC in the three proposed areas:

- Science-based Risk Assessment (regarding food borne antimicrobial resistant – micro organisms);
- Risk Management to contain food borne antimicrobial resistant micro organisms, and
- Risk Profiles for food-borne antimicrobial resistant micro organisms

A system to provide control authorities with an effective tool for exchange of information on measures taken to ensure food safety can be very effective in protecting public health. Guidance to exchange information is not new in the food sector but it has not been developed in the case of feed. The development of a global system to exchange information is critical for limiting the spread of a food safety problem and to allow the implementation of appropriate measures in a timely fashion. A Task Force should take into consideration at least the following elements: scope, objectives, criteria for notification and types of notification, establishment of official contact points; and minimum information required in a notification.

### **7. Identification of availability of expert and scientific advice**

FAO/WHO organised an expert consultation meeting from 8-12 October 2007. The conclusions, suggestions for further work and recommendations from this expert consultation are an important contribution for considering future work in this area of feed related food safety within Codex.

There are also other international activities which need be taken into consideration. The most relevant ones are:

- The OIE has developed a section about feed safety regarding animal health in its Terrestrial Code.
- The International Feed Industry Federation (IFIF) is finalising a document entitled "Good practices for the animal feed industry" implementing the Codex Code of Good Animal Feeding. This is a very ambitious document encompassing many areas relating to the feed industry.

### **8. Identification of any need for technical input to the standard from external bodies so that this can be planned for**

If required, additional input may be requested including from FAO/WHO/OIE to establish an expert consultation to provide additional technical advice.

### **9. Proposed time line**

In order to develop the proposed new work, a Task Force shall complete its work within four years (one session per year). The first session of the Task Force will be convened the year (during the last quarter) following the decision by the CAC to approve the new work. Adoption at step 5 will be at the latest at the third session of the Task Force, with adoption at step 8 by the CAC the following year.

**Annex II****EXPERIENCE IN IMPLEMENTING THE CODEX CODE OF PRACTICE IN GOOD ANIMAL FEEDING**

As regards European Community legislation, the principles and philosophy of the Code of Good Animal Feeding is used whenever modifying existing EC legislation relating to feed.

Annexes I – III of Regulation (EC) 183/2005 laying down requirements for feed hygiene, contain many of the provisions of the Codex Code of Good Animal Feeding. The Regulation itself and additional information can be found at:

[http://ec.europa.eu/food/food/animalnutrition/feedhygiene/index\\_en.htm](http://ec.europa.eu/food/food/animalnutrition/feedhygiene/index_en.htm)

Regulation 183/2005 introduced the concept of voluntary Community and national guides to good practice in feed production. Guidelines for the development of such Community guides to good practice have been prepared together with the Member States.

At present, the following Community guides to good practice have been already assessed according to Article 22 of the Regulation 183/2005:

- Community guide to good practice for the EU industrial compound feed and premixtures manufacturing sector for food-producing animals. Ref.: European Feed Manufacturers Guide FEFAC. [www.fefac.org](http://www.fefac.org), version 1.0, Jan 2007.
- Community guide to good practice for feed additive and premixture operators. Ref: FAMI-QS – European Association for Feed Additives and Premixtures Quality System. [www.fami-qs.org](http://www.fami-qs.org), version 2, 17 Jan 2007.
- Guide to good practice for the manufacture of safe pet foods. Ref: FEDIAF –European Pet Food Industry Federation. [www.fediaf.org](http://www.fediaf.org), Rev 8, Nov 2006.

Additional information on these guides can be found at:

[http://ec.europa.eu/food/food/animalnutrition/feedhygiene/guide\\_goodpractice\\_en.htm](http://ec.europa.eu/food/food/animalnutrition/feedhygiene/guide_goodpractice_en.htm)

In addition, and concerning in particular traceability, the provisions of Article 18 of Regulation (EC) 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety contains similar requirements to the Code. Details of the traceability aspects as well as information on this Regulation can be found at:

[http://ec.europa.eu/food/food/foodlaw/traceability/index\\_en.htm](http://ec.europa.eu/food/food/foodlaw/traceability/index_en.htm)

In addition to these measures, EU Member States have taken actions in relation with the implementation of the Codex Code in areas such as training sessions for farmers and feed manufacturers on good practices of animal feeding and GMP and HACCP for manufacturing feed and dissemination of detailed information leaflets and other materials on the different aspects of the Code of good animal feeding.

**1. Experience by EU Member States****1.1. Czech Republic**

During the last few months farmers and industrial producers of the Czech Republic were trained in the principles and philosophy of the Codex Code of Practice on Good Animal Feeding (in the final version CAC 54-2004). The trainings were organised by Agrarian Chamber, Association of Private Farmers of the Czech Republic and Bohemian-Moravian Association of Agricultural Supply and Purchasing Organisations (member of FEFAC). The main topics were Codex of principles of good practices on animal feeding for farmers and GMP and HACCP for manufacturers of premixtures and compound feed.

In 2007 the manual of good practice on feeding and breeding for farmers was published in cooperation of the Ministry of Agriculture, the Agrarian Chamber and the Research Institute for Animal Production. At the end of 2007 the Bohemian-Moravian Association of Agricultural Supply and Purchasing Organisations published a new large manual of good practices and HACCP principles for industrial producers. The requirements of this manual correspond with requirements laid down in the FEFAC Code “EFMC” mentioned above. The control of feed manufacturers with a view to keeping of HACCP system principles and good practices application is in process.

## 1.2. Germany

In addition to the Community legislation, Germany has developed national manuals for the implementation of the Regulation (EC) No 183/2005. These manuals are published at:

[http://www.bvl.bund.de/cln\\_007/nn\\_491320/DE/02\\_Futtermittel/05\\_FuttermBetriebe/futtermittelBetriebe\\_node.html\\_nnn=true](http://www.bvl.bund.de/cln_007/nn_491320/DE/02_Futtermittel/05_FuttermBetriebe/futtermittelBetriebe_node.html_nnn=true).

The Ministry of Food, Agriculture and Consumer Protection has published rules for development and evaluation of national guides to good practice according to Regulation (EC) No 183/2005.

Germany has published an orientation scheme with requirements for suitable quality of drinking water for animals as recommendation for farmers. This orientation scheme is published at:

[http://www.bmelv.de/cln\\_045/nn\\_753016/DE/07-SchutzderTiere/Futtermittelsicherheit/Orientierungsrahmen-Traenkewasser.html\\_nnn=true](http://www.bmelv.de/cln_045/nn_753016/DE/07-SchutzderTiere/Futtermittelsicherheit/Orientierungsrahmen-Traenkewasser.html_nnn=true)

## 1.3. Sweden

Sweden has not implemented the current Codex Code as such, since it is well reflected by the EU legislation.

Sweden has experienced that the most important trade obstacles are related to requirements in the field of contaminants/undesirable substances, feed hygiene, GMO and feed additives and in those areas there are gaps in the current Code on Good Animal Feeding.

## 1.4. United Kingdom

During the drafting of the Codex Code of Practice on Good Animal Feeding, the Food Standards Agency ensured that all interested parties in the UK were consulted and that their views were sought on the scope and provisions to be included in the Code. The main methods by which the guidance in the Code have been adopted or promoted are set out on the following pages.

### 1.4.1. ACAF Review of on-farm feeding practices.

The Advisory Committee on Animal Feedingstuffs (ACAF) is an independent committee which advises the UK government on the safety and use of animal feeds and feeding practices, with particular emphasis on protecting human health and with reference to new technical developments. The Committee carried out a review of on-farm animal feeding practices and in September 2003 published its report containing recommendations on the identification of hazards and the minimization of risks associated with the use of feeds at farm level. During its review the Committee was made aware of the contents the draft Codex Code of Practice on Good Animal Feeding. The recommendations and advice in the Committee's report reflects and supplements the provisions in Section 6 of the Codex Code, and is intended to assist farmers comply with the requirements of the EC Feed Hygiene Regulation (183/2005).

As the ACAF review reflects the basic guidance that is contained in the Codex Code, it has also been used as the basis to promote good practices on farm. The ACAF review also forms part of the study materials for officers enforcing feed hygiene legislation. (ACAF Report in <http://www.food.gov.uk/multimedia/pdfs/farm.pdf>)

### 1.4.2. Industry Codes

The Food Standards Agency has assisted the UK agriculture industry in developing a voluntary code of practice for use by farmers mixing or otherwise using feeds. The Assured Food Standards (AFS) *Code of Practice for on farm Feeding* was published in August 2006 (Ref [http://www.redtractor.org.uk/download/rt\\_code\\_farm\\_feeding.pdf](http://www.redtractor.org.uk/download/rt_code_farm_feeding.pdf))

The AFS Code of Practice reflects provisions in the Codex Code of Practice on Good Animal Feeding, the ACAF Report (referred to above) and the provisions of EC Regulation 183/2005. AFS, a major farm food/feed industry assurance scheme requires its members to comply with the requirements of the *Code of Practice for on-farm Feeding*.

This AFS Code has been submitted to COPA/COGECA for that organisation to consider submitting it to the European Commission for recognition as a Community Guide under Article 22 of EC Regulation 183/2005.

The National Association of Agricultural Contractors (NAAC) has drawn up an assurance scheme for mobile feed mixers. (Ref: <http://www.naac.co.uk/ALBC/AlbcFeed.aspx>). The scheme's requirements reflect, as appropriate, the provisions of the Codex Code and ACAF's recommendations.

### 1.4.3. Publicity/Training on Good Animal Feeding

An eye-catching A3 poster containing key messages on good feeding practices has been produced and distributed to on-farm mixers and farming organisations throughout the UK. A copy of the poster is available.

In Great Britain (England, Scotland and Wales) legislation on the marketing and composition of animal feed is enforced by local authorities. In Northern Ireland the legislation is enforced by the Department of Agriculture and Rural Development. A programme of training courses is currently being delivered to enforcement officers to explain the requirements of the EC Feed Hygiene Regulation. This includes the requirements in relation to good animal feeding.

A video entitled 'Feed for Thought' was also produced and distributed to enforcement officers. This shows examples of good and bad on-farm feeding practices.

### 1.4.4. Legislative Measures

In addition to the Community legislation mentioned above, the UK has made national Regulations to enforce these Regulations and produced material to publicise the requirements of the legislation. <http://www.food.gov.uk/foodindustry/farmingfood/animalfeed/animalfeedlegislation>

Article 20 of EC Regulation (EC) 1831/2003 specifies that Member States should encourage, where necessary, the development of national guides to good practice to help feed business operators comply with the requirements of the Regulation. This includes the requirements of Annexes I-III. The Food Standards Agency has drawn-up and published guidelines for the development of national voluntary guides to good hygiene practice and the application of HACCP principles. (Ref: <http://www.food.gov.uk/multimedia/pdfs/feednvgaugust07.pdf>)

There are several assurance schemes managed by trade associations in the UK which provide assurance in the feed and food supply chains. These schemes were developed to help prevent major feed and food safety incidents and recognise consumer, industry, government and stakeholder requirements. Examples include: a) the Universal Feed Assurance Scheme (UFAS) which covers the production, selling and haulage of compound feeds and feed materials to farms; b) the Trade Assurance Scheme for Combinable Crops (TASCC) which provides advice on the handling of grains, pulses and animal feed, materials in the supply chain beyond the farm gate; and c) the Feed Materials Assurance Scheme (FEMAS) which covers the supply of feed materials from the vast array of supply sources to their point of use.

## **2. Examples of additional voluntary guides to good hygienic practice relating to feed and animal production in Member States**

The following are some examples of additional voluntary guides of good hygienic practices existing at present in several Member States:

### **2.5.1. Belgium**

#### 2.5.1.1. Feed

Autocontrolegids Dierenvoeders / Guide autocontrôle alimentation animale / Autocontrol Guide for Feed. Reference: Overlegplatform Voedermiddelenkolom / Plate-forme de Concertation de la Filière Alimentation Animale (OVOCOM) Rev 0.0 dd, 15/12/2005, [www.ovocom.be](http://www.ovocom.be)

### **2.5.2. Czech Republic**

#### 2.5.2.1. Medicated Feedingstuffs

Správná výrobní a distribuční praxe při výrobě medikovaných krmiv. (Good Manufacturing and Distribution Practice in Manufacturing and Distribution of Medicated Feedingstuffs). Reference: Českomoravské sdružení organizací zemědělského zásobování a nákupu (Bohemian and Moravian Union of Organizations for Agriculture Supply and Purchase) dec-05, [www.mze.cz](http://www.mze.cz).

### **2.5.3. Denmark**

#### 2.5.3.1 Farms

"Nye regler om foder og fødevarer – Vejledning i god produktionspraksis i primærproduktionen – en branchekode" (Guide to Good Manufacturing Practice on farm). Ref.: Danish Agriculture & Danish Agricultural Advisory Service, December 2005. ISBN 87-87323-04-4 – [http://www.lr.dk/kvaeg/diverse/branchekode\\_pjece.pdf](http://www.lr.dk/kvaeg/diverse/branchekode_pjece.pdf).

#### 2.5.3.2. Transport of feed



”Branchevejledning for transport af foder” (Guideline for transport of feed). Ref.: International Transport Danmark (ITD) [www.itd.dk](http://www.itd.dk) & Dansk Transport og Logistik (DTL) [www.dtl-dk.dk](http://www.dtl-dk.dk) , November 2005.

#### **2.5.4. Finland**

##### 2.5.4.1 Cereals

2.5.4.1.1. Viljan hyvät tuotanto- ja varastointitavat (Guide to Good Practise for the production and storaging of grains). Ref: Vilja-alan yhteistyöryhmä 2006.

2.5.4.1.2. Viljelytekniset toimenpiteet hometoksiiniriskin pienentämiseksi (Cultivation techniques in reducing risks for mycotoxins). Ref: Vilja-alan yhteistyöryhmä/Turvallisuustyöryhmä 2007

##### 2.5.4.2 Feed industry code

Hyvät teollisen rehunvalmistuksen toimintatavat -ohjeisto ja rehuteollisuuden HACCP -ohjeisto (Finnish feed manufactures code and HACCP. This code is prepared by the industry and awaiting for the assessment by the Finnish authorities.

#### **2.5.5. France**

All guides below were prepared by the industry and are awaiting validation by the French authorities.

##### 2.5.5.1. Compound feed

Guide de bonnes pratiques d'hygiène de la fabrication d'aliments composes pour animaux (Guide for Good Hygiene Practice for compound feed). Ref; Syndicat National des Industries de la Nutrition Animale(SNIA) et COOP de France

##### 2.5.5.2. Mineral feed

Guide de bones pratiques d'hygiène de la fabrication d'aliments minéraux pour animaux (Guide for Good Hygiene practice for mineral feed). Ref: Association Française de compléments pour l'Alimentation Animale).

##### 2.5.5.3. Premixtures

Guide de bonnes pratiques pour la fabrication d'aliments pour animaux (Guide for Good Hygiene Practice for premixtures). Ref: SNIA COOP de France- Nutrition animale, AFCA-CIAL.

##### 2.5.5.4. Ruminants

Guide de bonnes pratiques d'hygiène en élevage de ruminants (Guide for good Hygiene Practice for ruminants livestock). Ref.: Confédération National de l'élevage (CNE)

##### 2.5.5.5. Pigs

Guide de bonnes pratiques d'hygiene en élevage de porcs (Guide for Good Hygiene Practice for pigs livestock). Ref: Institut du Porc (IFIP).

#### **2.5.6. Germany**

##### 2.5.6.1. Handling and storage of grain, feed and oilseeds

Leitlinie “Umschlag und Lagerung von Getreide, Futtermitteln und Ölsaaten” (Guide to good practice of handling and storage of grain, feed and oilseeds) Ref: [www.zds-seehaefen.de/information](http://www.zds-seehaefen.de/information)

#### **2.5.7. Lithuania**

##### 2.5.7.1. Milling production

Geros higienos praktikos taisyklės grūdų suprikimo, paruošimo ir saugojimo įmonėms (Guide to Good Hygiene Practice for grain preparation and storage establishments). Ref.: PATVIRTINTA, Ministry of Health of the Republic of Lithuania, 2004, [www.sam.lt](http://www.sam.lt)

#### **2.5.8. The Netherlands**

##### 2.5.8.1. Cereals, seeds and vegetables

Hygiëncode voor de graan-, zaden- en peulvruchten collecterende, verwerkende en afleverende industrie. (Guide to Good Hygiene Practice for the collecting, processing and supplying of grains, seeds and legumes). Ref: aug-05, [www.graan.com.nl](http://www.graan.com.nl).



## 2.5.9. Slovakia

### 2.5.9.1. Feed

In January 2006 the Code of Slovak Feed Producers was published in Bulletin of the Ministry of Agriculture. The document corresponds with the requirements laid down in the FEFAC Code of European Feed Manufacturers Code and HACCP Codex Alimentarius manuals. The national code was prepared by the Association of Feed Manufacturers, Storage Units and Business Companies Zvaz krmiv, skladovatelov a obchodnych spolocnosti - [www.zvazpolnonakupu.sk](http://www.zvazpolnonakupu.sk)). A workshop on good manufactory practice principles and HACCP for feed producers is being prepared. Ref: Křížna 52, 821 08, Bratislava, Nov-05., [www.zvazpolnonakupu.sk](http://www.zvazpolnonakupu.sk)

## 2.5.10 Spain

### 2.5.10.1. Laying Hens

2.5.10.1.1. Guía de buenas prácticas de higiene en granjas avícolas de puesta (Guide for Good Hygiene Practice for laying hens). Ref: Ministerio de Agricultura, Pesca y Alimentación, INPROVO 2004 251-04-071-2.

2.5.10.1.2. Guía de Buenas Prácticas de Higiene en explotaciones avícolas de puesta (Good Hygiene Practice Guide in Layings hens). Ref: ELIKA, Basque Food Safety Authority, Department of Agriculture, Fisheries and Food, Basque Government (DAPA), juin-05 ISBN:84-457-2415—0, [www.elika.net](http://www.elika.net).

## 2.5.11. Sweden

In Sweden it has been introduced, by the associations in cooperation with the Competent Authority, voluntary guides to good hygienic practice in the primary dairy milk production (on-farm feeding practices) and almost finished are guides on the trade and processing of feed materials (industrial codes).

## IRAN

National codex committee of Iran, welcomes the opportunity to provide comments on CL-2007/19-CAC: *Request for proposals for future work by codex on Animal Feeding and information on the national experience in the implementation of the Codex Code of Practice in Good Animal Feeding (CAC/RCP 54-2004)*:

### **1-National experience in the implementation of CAC/RCP 54-2004:**

1-1-This standard is translated into Persian and published in a hand book and also as a national standard. The documents were distributed in major feed industries, governmental authorities and non governmental organizations.

1-2-Two successful training courses and an international workshop were held on the principles of good animal feeding in 2007. Representatives of industries, government and non governmental organizations, and other users were attended.

### **2-Proposals for future work:**

The following proposals are offered by Islamic republic of Iran for future work by codex:

2-1-developing a global standard as named "*Glossary of terms and definitions of feed stuffs and feed industries*".

Iran, is ready to provide a proposal draft of this recommended standard.

2-2-Developing a standard as "*Guideline on good quality protection of feed*" this standard may includes such steps as: production, processing, transport, storage and use of feed and feed ingredients.

## NORWAY

Norway would like to thank you for this opportunity to respond to the above mentioned Circular Letter on future work within the Task Force on Animal Feeding. The Codex Code of Practice on Good Animal Feeding, adopted by Codex in 2004, was a major step forward to secure safe feed and food. Thus, we feel that - four years after its adoption - now is the time to continue work in this task force in other important areas. We, therefore, welcome new work.

Norwegian legislation on feeding stuffs is in line with that of the EU; we have not implemented the current Codex Code as such, but its principles and philosophy are taken into consideration whenever existing legislation relating to feed is to be modified.

As the food chain has become increasingly complex, every part of the chain must be as strong as the others if we want to adequately protect human health. It is essential to assess and monitor the risks to consumer health associated with the use of different feed ingredients as well as those associated with feed processing, feed production and trading practices.

**With regard to relevance to Codex strategic objectives**, new work would contribute both to the safety of human health and to ensure fair practice in the food and feed trade by meeting the objectives of the CAC Strategic Plan 2008-2013.

As to the availability of expert (scientific) advice, we look upon the conclusions, suggestions for further work and recommendations from the FAO/WHO expert consultation 8-12 October 2007 as important contributions for considering future work. There are also other international activities which need to be taken into consideration (OIE, IFIF).

We have listed the main aspects we suggest to be covered by new work in line with this:

- (a) Minimisation of the presence of undesirable substances (contaminants) in animal feed.
- (b) Guidelines on HACCP (Hazard Analysis and Critical Control Points)
- (c) Detailed regulations for a global system for exchange of information in feed control emergency situations or cases of rejection of imported feed. This should include the setting of criteria for notification and minimum information required in a notification.
- (d) General principles and guidelines for science based risk assessment of feed ingredients or categories of ingredients

When addressing these aspects, we are also looking forward to collaborate with, other Codex committees.

Finally, apologising for not presenting any project document, we would like to underline our support for new work to supplement the Code of Practice for Good Animal Feeding.

#### **UNITED STATES OF AMERICA**

The United States respectfully submits the following comments in response to **CL 2007/19, request for proposals for future work by Codex on Animal Feeding and information on the national experience in the implementation of the Codex Code of Practice in Good Animal Feeding (CAC/RCP 58 – 2004)**.

The United States recognizes the Code of Practice on Good Animal Feeding as a real achievement that embodies sound science-based principles. We believe that the Code provides guidance to all sectors of the feed, feed ingredient and feeding continuum involved in the production of food-producing animals, and is consistent with Codex's mandate to protect human health.

While the United States believes that the work of the Task Force on Animal Feeding is important to consumers, we believe that this task force should not undertake any new work until countries have had the opportunity to implement the Code. We would point out that a Compliance Manual is in the process of being finalized by the International Feed Industry (IFIF) in concert with the Food and Agriculture Organization (FAO). Additionally, IFIF and FAO are collaborating on information and education initiatives in foreign countries to acquaint them with the Code and its recommendations. Only after sufficient time has been allowed for these efforts to work, can a thorough evaluation be made in order to identify areas where additional work may be needed. After countries gain experience using the Code, there will be opportunities for a "gap analysis" and that analysis could be used to determine if there was a need for additional work by the task force.

In regards to the recommendations made by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety, we are not convinced that the Task Force on Animal Feed is the right venue for this work. In fact, some of the work involved in these recommendations is outside the remit of Codex, and could be done by other organizations. For example, recommendation xi, which concerns expanding INFOSAN in collaboration with OIE, could be done by WHO. In other cases, some of the work is already being handled by other Codex Committees or could be done on a cross cutting basis by other Codex Committees which have the expertise that the Task Force Animal Feed does not have.

Finally, we would like to note that when the task force was initially formed, a considerable amount of time was devoted to determining the scope and agenda for the task force. If, the Commission determines that the Task Force on Animal Feeding should undertake new work, we believe that the TORs should be very narrowly defined.

With respect to the circular letter's request for information on the national experience in implementing the Code of Practice in Good Animal Feeding, we would like to report the following:

1. The United States has implemented current good manufacturing practice (CGMP) regulations for medicated feed that apply to commercial and on-farm feed manufacturers.
2. The U.S. Food and Drug Administration (FDA) has undertaken a comprehensive, science-and-risk based Animal Feed Safety System initiative to identify and assess physical, chemical and microbiological hazards that may exist in feed and feed ingredients and announced its intent to develop process-control regulations where warranted to mitigate the adverse effects of such hazards.
3. FDA has implemented facility registration and recordkeeping requirements under the Bioterrorism Act of 2002 that, among other things, require product tracing consistent with the Code's recommendation (immediate previous source and immediate subsequent recipient, as well as the transporter utilized).
4. The Association of America Feed Control Officials – the professional organization of federal and state feed regulatory agencies – is finalizing CGMPs for non medicated feed and feed ingredients.

The United States thanks the Commission in advance for consideration of their comments.

### **FEFAC**

FEFAC, representing 25 national compound feed manufacturers associations in 20 EU Member States and in neighbouring countries (Switzerland, Norway, Turkey and Croatia), would like to offer its comments and proposal regarding the CODEX request for comments on future areas of work in animal feeding as well as information on the implementation of national codes of practices based on the Codex Code of Practice in animal feeding.

Many of our comments will reiterate our observations made in our communication (05) 11 to the Codex Secretariat on CL2004/33-CAC. However we have also taken into consideration the recommendations laid down in the Report of the FAO/WHO Expert meeting "Animal feed impact on Food safety" which took place in the FAO Headquarters, Rome, 8-12 October 2007.

#### **1. General comment on the role of Codex regarding the development of global feed safety standards**

We believe that the further development of global feed safety standards is fully consistent with the mission of CODEX to ensure a safe food supply of animal origin to consumers while fostering international trade in feed ingredients. Repeated incidents of feed-safety related food contamination and the work of the previous ad-hoc intergovernmental CODEX Task Force on Animal Feed have clearly established the fact that feed safety standards should be seen as essential and integral part for a safe supply of food products of animal origin.

International trade in feedingstuffs is the largest global feed and food commodity trade by volume. The European Union alone imports more than 50 Mio tons of feedingstuffs annually due to its huge deficit in vegetable proteins (app. 80%). Global feed safety standards are thus an essential prerequisite for the sustainable development of international trade in feedingstuffs.

From our experience with the present working structure of the Codex Alimentarius Commission and its subsidiary Committees, we have noted that the main Standing Committees, which are mandated to develop feed safety standards (CCCF, CCFH CCVRDF) were not sufficiently equipped to deal with arising feed safety issues in a consistent manner. We believe this may be due to a lack of feed regulatory expertise at the level of the chair and in the national delegations, which are largely dominated by food regulators with no or limited experience in feed production methods.

We do recognise that the first ad-hoc Intergovernmental CODEX Task Force on Animal Feeding did gather the best available feed regulatory expertise at global level for the purpose of developing the Codex code of practice on good animal feeding, but fear that this expertise may continue to be unavailable to CODEX unless national delegations are prepared to integrate this expertise systematically in their delegations.

Given the close interaction of food and feed production, with animal feed providing a key market for food co-products, CODEX needs to take due account of the impact of any food standard setting activity on safe feed supply. Otherwise food safety standards may be developed to the detriment of feed safety ultimately endangering the safe supply of foodstuffs of animal origin.

We consider that the FAO-WHO expert group meeting in Rome in October 2007 has provided valuable guidance to feed and food regulators to prioritize work with regard to harmonisation of feed safety standards at international level.

In the following we would like to highlight areas of particular interest for the European feed industry following the review of the FAO/WHO report.

## **2. Future areas of CODEX work on animal feeding**

On the basis of our general comments and observations regarding the current working procedures and priorities at CODEX level, taking into consideration the key conclusions and identification of relevant areas for further work on animal feed in relation to food safety, we would therefore strongly welcome continued CODEX standardisation activities in the following feed safety related areas :

- The development of guidance on Feed safety Risk assessment methodology

FEFAC considers the absence of a harmonised approach on feed safety risk assessment of feed ingredients as one of the key factors why feed business operators are confronted with widely diverging risk management approaches and feed safety targets regarding the control and management of feed hazards. FEFAC therefore fully supports the development of general principles and guidelines in this area as advocated by the FAO/WHO expert group

- The development of guidance on risk-proportionate Risk Management tools for feed safety

FEFAC considers that many currently used Risk management tools by feed regulators are disproportionate or inadequate to reduce the risk involved for food safety due to the lack of knowledge regarding transfer rates of certain contaminants from feed to food. We therefore strongly support the FAO/expert group recommendation to develop international standards for undesirable substances based on the TDI approach which must be developed on a species approach. This work should include the review of the CODEX code on source-directed measures to reduce contamination in food with Chemicals (CAC/RCP 49-2001) to include feed related recommendations including criteria and methods for effective decontamination methods

- Development of rapid and economical methods of analysis for screening of feed and feed ingredients

FEFAC experts consider this area as one of the top priorities for a new CODEX Task Force which could assist CCMAS in identifying effective methods of analysis capable of detecting undesirable substance in the complex feed matrixes for which most of the currently used food testing methods have proven to be of no or only limited value. In this context we noted with interest the European Community mandate to the CEN TC327 to develop methods of analysis for feedstuffs. We believe that rapid, robust, reliable, and reproducible testing methods are a key to overcome current trade problems with feedstuffs often resulting from highly variable, unreliable, inaccurate analysis carried out by official control laboratories.

- Expanding the global exchange information system to emerging feed safety incidents according to the existing CODEX guidelines for Exchange of Information in Food control emergency Situations.

FEFAC highly welcomes an integrated approach at CODEX level regarding the notification and exchange of information on emerging feed safety risks. We believe this would be a crucial instrument to reduce response time both by feed regulators and operators on such emerging risks thus effectively limiting exposure of farm animals and the final consumer to feed borne food safety risks. FEFAC's experiences with the EU RASFF notification system listing separately feed safety hazards have been highly encouraging, after some initial start-up difficulties, as this information provides a useful benchmark for industry to concentrate its efforts to further improve its feed hygiene management on recurring feed safety incidents.

We are fully aware about the continued need for close cooperation between CODEX, OIE, WHO and the IPPC in areas where feed safety may be linked directly or indirectly to animal health issues, food-borne epidemics and environmental safety. We would strongly encourage CODEX to take a proactive role to facilitate such cooperation where appropriate as recently demonstrated on the issue of the use of antimicrobial substances in food animal production as recently demonstrated by the CODEX Task Force on antimicrobial resistance.

### 3. FEFAC experience with the implementation of the Codex Code of practice for good animal feeding

As a response to the BSE crisis, FEFAC started work in 1998 to develop harmonised European guidelines for the development of national codes for compound feed and premix manufacturers. In the wake of the Dioxin crisis, FEFAC introduced the HACCP principles in its guidelines in 2001. As active observer in the 1st Codex Task Force on animal feed, FEFAC provided its expertise to the Task Force and the development of the Codex Code of practice adopted in 2004. In the same year FEFAC moved from a guidelines approach to a European code of practice, the European feed manufacturer's code, EFMC endorsing the CODEX recommendations and submitted it for assessment to the European Commission in 2005. Following the adoption of the new EU feed hygiene regulation encouraging the feed business operators to develop European guides, the European Commission and Member States successfully reviewed the EFMC which was published in March 2007 as Community guide to good practice for the EU industrial compound feed and premixtures manufacturing sector for food-producing animals — European Feed Manufacturers Guide.

The response by FEFAC members was highly positive, with 18 national codes adopted (cf. attached list) and further codes under preparation, covering approximately 90 % of the commercial compound feed and premix production in the EU-27 and candidate countries.

FEFAC has established an EFMC Committee which monitors the development of national codes and reviews regularly the content of the EFMC. Currently FEFAC has submitted a new chapter for medicated feed production to the European Commission for assessment following its request for further improvement.

In addition FEFAC has carried out more than a dozen feed hygiene, EFMC related training courses mainly in the new EU Member States, but also in Turkey and Croatia, and for the EU feed inspectors in the Food and Veterinary Office, with the help of EU and national authorities as well as the FAO who presented the CODEX code of practice at some of these events. Many of the national association members have integrated a feed hygiene and feed safety assurance training activity in their annual work programme.

FEFAC has also actively contributed to the joint FAO/IFIF manual on good animal feeding (to be published shortly), integrating the Codex code with additional practical information for feed business operators and feed industry associations. Its experts participated in subsequent training workshops in developing countries open to feed business operators and feed regulators.

#### LIST OF NATIONAL GUIDES TO GOOD PRACTICE BASED ON THE EFMC

- **Portugal (IACA):** [Guia de Boas Práticas para os Industriais de Pré-Misturas e de alimentos compostos para animais destinados à produção de géneros alimentícios](#)
- **The Netherlands (Productschap Diervoeder):** [GMP+-certificatieschema diervoedersector 2006 – Productie & bewerking diervoeders voor lanbouwhuisdieren – GMP+ standaard B1](#) (EN)
- **Belgium (OVOCOM):** [Code GMP général pour le secteur de l'alimentation animale](#) (NL)
- **Luxembourg (OVOCOM):** [Code GMP général pour le secteur de l'alimentation animale](#)
- **Italy (ASSALZOO):** [Codex-Assalzo di buone pratiche per la produzione e la commercializzazione di alimenti composti per animali da reddito](#)
- **France (SNIA/SYNCO PAC):** Guide de Bonnes Pratiques de la Fabrication des Aliments Composés pour Animaux (contact [SNIA](#) for more information)
- **Germany (QS):** [QS Leitfaden für die Futtermittelwirtschaft](#)
- **UK (AIC):** [Universal Feed Assurance Scheme](#) (UFAS) - Code of Practice for the Manufacture of Safe Compound Animal Feedingstuffs
- **Spain (CESFAC):** [Alimentacion Animal Certificada](#)
- **Czech Republic (CMSO ZZN):** Code of good manufacturing and hygiene practice for the manufacturers of premixtures and compound feedingstuffs containing premixtures or complementary feedingstuffs for farm animal nutrition (contact [CMSO-ZZN](#) for more information)
- **Denmark (DAKOFO):** EFMC has been translated in the national language and will serve as the reference code for the organization members (contact [DAKOFO](#) for more information)

- **Ireland:** [Irish Feed Assurance Scheme](#) - Code of Practice for the Manufacture of Safe Compound Animal Feedingstuffs
- **Austria (VFÖ):** Austrian Feed Manufacturers Code (contact [VFÖ](#) for more information)
- **Slovenia (GZS):** Slovenian Feed Manufacturers Code (contact [GZS](#) for more information)
- **Poland (IZBA Gospodarcza):** EFMC has been translated in the national language and will serve as the reference code for the organization members (contact [IZBA](#) for more information)
- **Slovakia (AFPWTC):** Slovak Feed Manufacturers Code (contact [AFPWTC](#) for more information)
- **Finland (FFDIF):** Finish Feed Manufacturers Code (contact [FFDIF](#) for more information)
- **Switzerland (VSF):** SFPS Schweizerischer Futtermittel Produktions-Standard (Leitlinien für eine gute Verfahrenspraxis für die Herstellung von Futtermitteln) (contact [VSF](#) for more information)

### **IFAH**

The International Federation for Animal Health (IFAH) appreciates the opportunity to address the Codex Alimentarius Commission's request for comments in Circular Letter 2007/19-CAC on proposals for future work on animal feeding.

The Code of Practice on Good Animal Feeding that was adopted in 2004 after five years of arduous deliberations by the Ad Hoc Intergovernmental Task Force represented a landmark achievement. The Code embodies sound, science-based feed safety principles to be observed by all stakeholders involved in the production of food-producing animals, and are consistent with Codex's mandate to protect public health of the consumers and ensure fair practices in the food trade.

IFAH recommends the Codex Alimentarius Commission defer consideration of proposals for future work on animal feeding for the following reasons:

1. First and foremost, it is premature to consider such proposals because the process of implementing the new Code just now is beginning. The first tangible document to assist Codex member nations in implementing the new Code worldwide – a Compliance Manual – is being finalized this spring by the International Feed Industry Federation (IFIF) in concert with the Food and Agricultural Organization (FAO). In addition, IFIF and FAO are collaborating on information and education initiatives in foreign countries to acquaint various world governments and affected feed and feeding sectors about the Code and its recommendations. Sufficient time is needed to allow member countries to develop a sufficient feed safety code after these information and educational efforts have been given an opportunity to work. We submit that it is premature to develop additional terms of reference with respect to this Code of Practice until such time as it has been implemented and a more thorough evaluation can be made of what, if any, shortcomings may exist.
2. We believe it is inappropriate for Codex to expend scarce financial resources of member countries on additional animal feeding-related activities, particularly before the new Code has been given a chance to be implemented and work in a representative array of countries. This is especially true given the fact that there are other Codex activities already underway which need that funding.
3. IFAH has evaluated carefully the final “Report of the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety” issued in January 2008, and believes that its recommendations support the position that reestablishment of a task force on animal feeding is unnecessary at this time. Indeed, the Expert Panel's first recommendation is that the existing Code of Practice on Good Animal Feeding be “promoted in order to minimize risks,” which is precisely the objective of the joint IFIF-FAO Compliance Manual and education/information initiatives referenced previously. Most other recommendations in the FAO/WHO Expert Panel's report are outside the scope of Codex. But even the few recommendations that reference Codex – such as the development of a Code of Practice for exchanging information during feed safety incidents – are more appropriately a function of FAO since they address when incidents should be reported to the competent government national authority by the affected feed and feeding entities within their respective countries.
4. IFAH believes Codex should evaluate fully the cross-cutting work of other Codex committees and task forces that may have application or relevance to animal feed safety before authorizing new terms of reference on animal feeding.

5. Anticipated proposals or project documents that may be posited by other countries – on such issues as genetically modified organisms, low-level antimicrobial growth promotants and other issues related to feed – already are being addressed by other standing Codex committees.

IFAH also would like to take this opportunity to reiterate its previously opposition to proposals from other countries that we anticipate may resurface in response to CL 2007/19-CAC:

- **Developing Negative List of Feed Ingredients Unacceptable in Animal Feeding within CODEX:** The maintenance of positive and negative lists demands resources that generally are unavailable to Codex committees. Lists are particularly inappropriate within Codex committees and task forces that are of limited duration. To adhere to a science-based process, Codex committees also must have access to appropriate authoritative bodies for risk analysis. Consequently, lists within Codex should only be established after: 1) a clear set of evaluation criteria can be established, with the understanding that these criteria are to be subject to revision as scientific and technical advances dictate; 2) a clear and transparent process for undertaking risk evaluation or risk assessment is set forth; 3) an expert body is identified with the appropriate expertise and objectivity to conduct such evaluations based upon sound science; and 4) a timely process for modifying lists (i.e., adding or removing substances to positive and negative lists) is established to quickly react to new scientific information.
- **Developing Detailed Rules for Rapid Alert Systems in Feeds:** The development of Rapid Alert Systems is outside the scope of Codex. This subject should continue to be addressed by country-to-country arrangements through agreed-upon certification and inspection systems.
- **Lists of Undesirable Substances, Such As Heavy and Toxic Metals, Mycotoxins, Dioxins, Furans and Dioxin-Like PCBs, Pesticides and Zoonotic Pathogenic Agents:** During the deliberations of the Ad Hoc Intergovernmental Task Force on Animal Feeding, the Codex Secretariat informed the delegates that many of the suggested undesirable substances are addressed by other Codex committees, such as Pesticide Residues and Food Additive and Contaminants. We continue to support allowing existing Codex committees to complete this work.
- **Applying HACCP Systems in the Processing of Feed and Feed Ingredients:** Codex previously has taken a position that HACCP principles are one of several approaches that may be applied to produce safe feed for food-producing animals. The Code of Practice on Good Animal Feeding provides for the use of good manufacturing practices (GMPs) and, “where applicable” HACCP principles” to control “to the extent reasonably achievable” hazards that may affect the safety of foods from animal origin. [Emphasis added.] No other standing committee or task force of the Codex Alimentarius Commission includes a HACCP annex; instead, these bodies reference the General Principles of Food Hygiene. Thus, we believe the additional HACCP Annex is unnecessary and inconsistent with Codex practices.

Thank you for considering IFAH’s views in opposing the resumption of work within Codex on good animal feeding practices at this time.

### **IFIF**

In the event that the Codex Alimentarius Commission decides to set up a new Task Force on Animal Feeding, IFIF would recommend to the Commission that it includes within the terms of reference of the Task Force the following two points:

- 1) Development and harmonization of an internationally-accepted Feed Safety Risk Assessment Methodology:

Justification – currently agreed Codex Food Safety Risk Assessment Methodology is not adequate to address food safety-related feed-safety issues as identified by the FAO report of February 2008. IFIF members today face the reality that different national feed safety assessment methodologies applied by Codex members lead to highly different risk assessment results and subsequently to contradictory risk management decisions. These differences hamper international trade in feedstuffs without any associated benefit for consumer safety. This work involves answering the question whether current international regulatory authorities and bodies are sufficient to take care of feed safety risk assessment (such as JECFA, etc) or whether new risk assessment capacity is needed?

- 2) Work on harmonisation of risk management tools

Justification – feed manufacturers and livestock farmers are confronted with very different national requirements regarding risk management tools, which in turn hampers the global trade in feedstuffs. The Task Force on Animal Feed should therefore be requested to list all available options on risk management tools and to make proposals for risk-proportionate risk management measures.

IFIF informs the Codex Commission that it is commencing work on the establishment of an international list of globally-traded feed ingredients under its own responsibility.