codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 4 **CX/AF 00/4**
May 2000

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

***AD-HOC* INTERGOVERNMENTAL CODEX TASK FORCE ON ANIMAL FEEDING**
First Session
Copenhagen, Denmark, 13-15 June 2000

CONSIDERATION OF THE PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING AND MATTERS REGARDING OTHER ASPECTS OF FOOD SAFETY IN ANIMAL FEEDING IN ADDITION TO CURRENT CODE OF PRACTICE

1. This document summarizes government comments submitted in response to CL 1999/28-AF requesting proposals for additions or amendments to the Proposed Draft Code of Practice on Good Animal Feeding and comments in relation to the food safety issues identified by the Codex Alimentarius Commission in the Terms of Reference.

2. At its 23rd Session, the Codex Alimentarius Commission noted that recommendation of the 46th Session of the Executive Committee concerning the urgent need for the Commission to develop international guidelines or recommendations which addressed all the issues relating to animal feeding and that the new mechanism of an *ad hoc* Intergovernmental Codex Task Force would be an appropriate means of achieving this goal. The Commission agreed to designate the Government of Denmark to be responsible for appointing the Chairman of the Task Force in compliance with Rule IX.10 of its Rules of Procedure (ALINORM 99/37, para. 230).

3. In order to cover the majority of concerns of the Member Governments, the Chairman of the *Ad-Hoc* Intergovernmental Codex Task Force on Animal Feeding requested Member Governments and interested International Organizations to provide proposals for additions or amendments to the Proposed Draft Code of Practice on Good Animal Feeding and comments in relation to the food safety issues identified by the Codex Alimentarius Commission in the Terms of Reference of this Task Force. The document was prepared by the Chairman of the *Ad Hoc* Intergovernmental Codex Task Force on Animal Feeding. Additional proposals and comments submitted in response to CL 1999/28-AF are contained in document CX/AF 00/4-Add. 1.

4. Due to the diversities of opinions expressed by Member Governments, the document contains the original text of the Proposed Draft Code of Practice on Good Animal Feeding with summarized comments submitted by governments and interested international organizations. The text of the Proposed Draft Code of Practice on Good Animal Feeding and the comments are submitted to the Task Force **for consideration**.

GOVERNMENT COMMENTS ON THE PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING

DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING

TITLE

Australia belives, that the title of the code should be revised to read “Draft Code of Practice for Good Manufacture, Handling and Storage of Feeds for Farm Animals.” They would support a separate Code of Practice to be developed to cover the Practice of Good Animal Feeding. Australia supports the general principles of the draft code as it is currently written for the manufacture, handling and storage of feeds for farm animals because it is not too prescriptive and encompasses the variability of individual country regulations.

U.S. recommends that the title of the Code be revised to read " Draft Code of Practice for Good Animal Feed Manufacturing".

IDF suggests including production and processing into the title of the Draft Code.

1. INTRODUCTION

1.1. This code of practice applies to feed manufacturing and to the use of all feeds, other than those consumed while grazing free range. The objective of the code is to encourage adherence to Good Manufacturing Practice (GMP) during the procurement, handling, storage, processing (however minimal), and distribution of feed for food producing animals. A further objective is to encourage good feeding practices on the farm.

Australia would support a separate Code of Practice to be developed to cover the Practice of Good Animal Feeding. Australia supports the general principles of the draft code as it is currently written for the manufacture, handling and storage of feeds for farm animals because it is not too prescriptive and encompasses the variability of individual country regulations.

Canada recommends including grazing free range into the code.

Denmark suggests that the code include production of ingredients, trade, manufacture of feedingstuffs and the use at farm level.

The code should be supervised by national surveillance and control systems. It is essential to establish a food safety system, which covers the whole production chain from farm to table.

Traceability of feed ingredients, feedingstuffs and additives in feedingstuffs should be established.

A universal warning system with procedures for withdrawal of feedingstuffs from the market where there is a risk to animals and the consumers should be established.

The Netherlands proposes that the Code be addressed to the whole feed chain including producers, traders, transporters, processors and consumers of animal feed.

The Code should be included in countries infrastructure or feed information.

U.S. supports development of a separate reference document by Codex relating to on farm feeding. The report of the FAO Expert Consultation on Animal Feeding and Food Safety (Rome, 10-14 March 1997) focused on feed manufacturing and the hazards associated with feed ingredients. The U.S. would support a separate reference document, similar to the "Animal Feeding and Food Safety - Report of the FAO Expert Consultation"[1], with the Code.

CI finds it necessary to develop standards beside the Code of Practice to ensure safety of animal feedingstuffs on TSEs, antimicrobials, chemical and microbial contamination and residues of veterinary drugs. Appropriate Codex standards or guidelines on animal feedingstuffs will protect the consumers.

FEFAC has submitted the FEFAC guidelines for the implementing of a code of practice for the manufacturing of safe animal feed as a contribution for the Ad-Hoc Task Force work on the completion of the Draft Code of Practice for Good Animal Feeding.

FEFAC finds that the introduction should distinguish more clearly between manufactured animal feed and farm-produced animal feed. FEFAC does support an all-embracing approach towards the establishment of internationally recognised code of practices for animal feed whether produced by manufacturers or on-farm. From an animal and public health perspective, it is important to know the potential hazards and measures of their control of all feedingstuffs which “go down an animal’s throat”.

IDF suggests that the Codex International Code of Practice - General Principles of Food Hygiene should serve as a model for processing of feed. The HACCP approach should be recommended.

Traceability of feed material and ingredients are important product information.

Labelling of feed supplies, including trade name, name and address of the producer, ingredients, direction for use, precautions, lot identification, expiry date and certificate of origin

Handling of feed at farm level, in particular provisions related to cleaning, pest control and transportation should also be covered.

Feeding practice, feed supplies and provisions concerning use of sewage or manure on grazing fields should be included into the Code.

IFIF suggests that the code only should cover " Draft Code of Practices for Good Animal Feed Manufacturing", they do not want to include animal husbandry or broad feeding practice into the code. IFIF wants to include model language on GMP in member countries as well as risk assessment data available on certain ingredients.

1.2 There are potential risks to human health associated with the contamination of feed with chemical or biological agents. This code outlines the means by which these hazards can be controlled by adopting appropriate processing, handling and monitoring procedures. The principle approaches required for assessing foodborne hazards to human health have been outlined elsewhere.[2]

Belgium proposes to include the definitions on animal feedingstuffs, animals, complementary feedingstuffs, premixes and feed ingredients into the Code.

1 Animal Feeding and Food Safety, Report of an FAO Expert Consultation, Rome, 10-14 March 1997 ; FAO Food and Nutrition Paper (FNP) 69.

2 Application of Risk Analysis to Food Standards Issues, Report of the Joint FAO/WHO Expert Consultation, Geneva, Switzerland, 13-17 March 1995 (WHO/FNU/FOS/95.3).

The maximum level of cross-contamination by additives and feed ingredients (animal meal) should be established.

Establishing a positive list of raw materials and their possible contaminants.

The Netherlands: In order to minimize or avoid undesirable substances and products in animal feed, it is nesessary to expand the list of undesirebles, avoid dilution of contaminants and to introduce HACCP requirements on production, transport, storage and processing feed materials.

It is recommendet to introduce GMP rules for the industry and to include HACCP systems for audit and inspections by the governments. A uniform control system should be included into the code.

Sweden would like to stress the urgent need for further steps in order to introduce more specific recommendations such as maximum limits of undesirable substances, positive list of additives, hygiene requirements regarding e.g. salmonella, negative list of feed materials etc. The draft code should cover both fields and at specific parts a distinction should be made between farm level and commercial levels.

"Traceability of raw material, additives and compound feedingstuffs should be ensured by labelling of the feedingstuffs, records/register at the establishments and by reporting to the surveillance authorities."

2. GENERAL REQUIREMENT

2.1. The ultimate responsibility for the production of safe and wholesome feed lies with the producer or manufacturer who should produce feeds with as low a level of hazard as possible and complies with any applicable statutory requirements.

The **U.S.** would not support the revision of the Code to be more prescriptive.

FEFAC would propose to replace "*with as low a level of hazard as possible*" by with *as low a level of hazard as reasonably achievable*" in order to ensure consistency with the CODEX approach towards food contaminants based on the ALARA principle.

2.2. The effective implementation of GMP protocols will ensure that:

FEFAC would suggest distinguishing between general horizontal principles which should guide the production of safe feed and GMP protocols. These principles could be derived and adapted from the CODEX General Principles of Food Hygiene (1985) in order to ensure consistency within the feed and food chain.

The appropriateness of separate GMP protocols for manufactured animal feed and for farm-produced animal feed should be discussed.

FEFAC would propose a separate GMP protocol for industrially manufactured animal feed to cover the following activities:

The sourcing of safe feed materials;
The production of safe feed in general
The use of additives and veterinary medicinal substances in feed in particular

It should be clearly specified in the protocol that industrial feed manufacturers can use it to compare the

methods and practices as laid down with their own production methods and plant management and, when necessary, improve or adapt these. Specific conditions in each plant will determine the way in which manufacturers adapt and transpose the provisions laid down in the present guidelines to establish practical rules, procedures and working instructions. These objectives can also be achieved under ISO 9000 –9002 certification or other quality assurance programmes incorporating HACCP principles.

- buildings and equipment, including processing machinery, will be constructed in a manner which permits, case of operation, maintenance and cleaning;

Argentina: Buildings and equipment, including machinery for preparation, fragmentation and packaging, should be constructed in such a way that their operation, maintenance and cleaning are easy and practical.

sewage, waste and rain water should be eliminated so that the equipment, ingredients, food and environment remain free of contaminants.

- staff will be adequately trained and that training is kept up to date;

- records, will be maintained concerning source of ingredients, formulations including details and source of all additives, date of manufacture, processing conditions and any date of dispatch, details of any transport and destination;

Argentina. When laboratory tests are carried out, they should be undertaken by standardised methods.

Canada suggests the following wording: "records are maintained concerning sources of all ingredients (including additives), detailed formulations including, date of manufacture, processing conditions and date of dispatch, details of any transport and destination"

- water used in feed manufacture is of potable quality;

- machinery coming into contact with feed is dried following any wet cleaning process;

- condensation is minimised;

- sewage, waste and rain water is disposed of in a manner that ensures that equipment, ingredients and feed are not contaminated; and

- feed processing plants storage facilities and their immediate surroundings are kept clean and free of pests.

Canada suggests to replace "free of pests" with "that there are effective pest control programs in place"

Canada suggests adding additional bullets

- all scales and metering devices used in the manufacture of feeds are appropriate for the range of weights or volumes to be measured. In addition, GMP protocols will require that all scales and metering devices be tested for accuracy at the time of installation, and as frequently as necessary to ensure proper function, but not less than once a year.

- all mixers used in the manufacture of feeds should be appropriate for the range of weights or volumes being mixed, and should be capable of manufacturing homogeneous mixtures. In addition, GMP protocols will require that the functioning of all mixers be verified at the time of installation; and as frequently as necessary to ensure proper functioning, but not less than once a year.

- all feed ingredients should meet minimum safety standards (e.g., heavy metal levels in minerals, maximum mycotoxin levels in grains, etc.).

- the proper use of feed additive medications; including manufacturing strategies to avoid cross-contamination (flushing, sequencing, and physical cleanout).

- the proper use of animal byproduct meals; including manufacturing strategies to avoid cross-contamination (flushing, sequencing, and physical cleanout) between batches of feeds containing ruminant meat and bone meal and feeds destined for feeding to ruminants.

- the medicated feeds and medicating ingredients used in the manufacture of feeds be received, inspected, identified, handled and stored in such a manner that their potency and purity are preserved.

- a regular (daily) accurate inventory of medicated feeds and medicated ingredients used in the manufacture of medicated feeds are maintained.

- procedures are in place, which allow the rapid recall of any feed, which is determined to pose a threat to animal and/or human health.

3. RAW MATERIALS OF ANIMAL AND PLANT ORIGIN

3.1. Raw materials of animal and plant origin should be obtained from reputable sources, preferably with a supplier warranty. Monitoring of ingredients should include inspection and sampling of ingredients for contaminants using risk based protocols. Laboratory testing, where undertaken, should be by standard methods. Ingredients should meet acceptable, and if applicable, statutory standards for levels of pathogens, mycotoxins, herbicides, pesticides and other contaminants which may give rise to human health hazards.

Denmark suggests the following amendments to the draft code:

Prohibiting the use of antibiotics in animal nutrition for growth promoting purposes

Establishing a global list of materials which are forbidden to use in animal feedingstuff production (seed treated with fungicides, waste, byproducts from the food industry, the stomach content of slaughter animals, animal manure etc.)

Developing standards relating to the use of meat and bone meal from ruminants (BSE/TSE) and fallen stock

Establishing of guidelines for the content of chemical contaminants, mycotoxins and residues of pesticides

Establishing common rules for the quality of fat

Establishing of guidelines for decontamination of ingredients

Establishing transfer rates for toxins and chemical contaminants (dioxin, PCB, pesticides and heavy

metals) from feed to food.

Establishing a labelling system with open declaration of ingredients, additives and the chemical composition

Establishing labelling rules for genetic modified organisms (GMO products)

Limiting zoonoses and microbiological contamination's of feedingstuffs

Including feeding standards for animal production in relation to the environment and animal welfare into the draft code

Sweden proposes that:

”Feedingstuffs containing not permitted level of contaminants should not be diluted in order to decrease the level of the contaminant. Such material should be destroyed or decontaminated by a safe method.”

Feedingstuffs should on a regularly basis be monitored by documentary and physical controls in particular as regards safety. Concerning residues even indirectly by foodstuffs control as well. The manufacturer should have a system of documentation designed to define and ensure mastery of the critical points in the manufacturing process and to establish and implement a quality control plan.” *Comment*: Quite a lot of the contents in Council Directive 95/69/EC in particular of chapter I in the annex am applicable.

”Collection systems of by-products and waste materials for recovery should be strictly controlled and secured by appropriate measures as regards the risk of cross-contamination, e. g to avoid that, by mistake, hazardous materials not fit for animals will be mixed with feed materials fit for animals.”

”Additives, specific feed materials and GMO should be scientifically assessed and approved according to basic criteria of safety such as toxicity, environmental/ecological impact and controllability. In addition there should be clear rules concerning the labelling and the use.”

WHO proposes to include the recommendations from aWHO consultation held in Geneva on June 5-9, 2000 on prudent use of antimicrobials in food-producing animals. The consultation is an integrated WHO activity entitled the "WHO global strategy for the cantainment of Antimicrobial resistance".

CI proposes to include standards based on Risk Analysis into the code, agreed maximum contents for contaminants (incl. heavy metals).

CI asks for a discussion of the following items: a definition of "waste" and its recovery in feedingstuffs, the use of GMOs, labelling requirements to ensure traceability for all animal feedingstuffs including full labelling of ingredients and declaration of any genetically modified derived ingredients, the use of permitted additives, matters relation to organic produced feed, monitoring programs for contaminants and nutrition profile, including labelling and assessment of consequences for human and animal health.

CI wants, consistent with a policy of risk analysis the priority given to issues like TSEs and antimicrobial substances used in animal feedingstuffs (special paper with comments to CCRVDF 1998 on TSEs and use of antibiotics. No part or product of any animal showing signs of TSE should enter any food chain (human or animal). Antibiotics should not be used in animal feedingstuffs for growth-promotion purposes)

IDF finds it important that the GMPs specified by the Code are ultimately targeted towards food safety and suitability, such as assisting in food complying with any relevant criteria, ML and MRL (standards) as established by Codex. It should cover general principles for controlling the hazards and contamination routes from feed to food.

IDF recommends that the sources are traceable and from suppliers who have a quality system. Laboratory analysis should be performed by validated methods (Codex requirements for validation of analytical

methods) Plant alkaloids and phytotoxins (algeal) should be included into the list of health hazards.

IDF finds that production (use of fertilizers and pesticides) and storage of raw material, as well as control of pests, fungus and pathogens for feed animals or intended for further processing by the feed industry the existing GMP for production and use of specific feed ingredients such as feed additives, functional ingredients (e.g. pre-probiotics) and veterinary drugs, should be referred to.

Procurement of feed material and ingredients according to usual Quality Assurance approach including auditing of suppliers, product specifications and sampling and testing procedures.

Water used as an ingredient in feed should be mentioned.

3.2. In order to control the spread of specific pathogens it may be necessary to specify, for any given ingredient, the country and species of origin and any treatment process used. prior to purchase. Care should be taken to preserve the identity of such material after procurement to facilitate any tracking that might be required.

Argentina on RUMINANT FEED :

In this connection, we wish to state that in our country there is legislation regulating ruminant feed as a safety measure in relation to the disease Bovine Spongiform Encephalopathy (BSE). More specifically, Resolution 611/96 of SENASA (of 2/10/96) establishes:

A ban on the administration for purposes of feeding or supplementing proteins of ruminant origin (bone flour, meat flour, meat and bone flour, crushed digested bone, flour made of organs and any other product which may contain them) to ruminants, either as the only ingredient or mixed with other products. (Art. 1).

The exception to the previous ban for lactic proteins produced by ruminants. (Art. 2).

The authorisation to use bone ash from ruminant animals, as a mineral contribution (calcium and phosphorous) of animal origin to supplement ruminant feed. This bone ash should be obtained by subjecting the bones to a temperature not lower than 600°C for a period of not less than one hour, and the absence of proteins must be verified. (Arts 3 and 4).

In view of these circumstances, Argentina proposes that a specific item be included in the said Code to cover the above situation.

Canada suggests adding the following restrictions: "To control the spread of TSEs, animal manure must not be used in the preparation of feed for ruminants." Special problem with poultry manures.

Sweden proposes that:

1. ”High risk animal waste (according to the definition of Council Directive 90/667/EEC) should not be used for animal feeding.”

2. ”Salmonella in feedingstuffs should be controlled in the manufacturing process of raw materials, both of animal and plant origin, and compound feedingstuffs.”

3. ”Indirect drying technique should be applied instead of direct drying processes in order to eliminate the impurities from the combustion. At least solid fuel or heavy fuel oils should not be used.”

FEFAC : Establishing a list of priorities regarding health hazards and risks associated with animal feed or feeding practices taking into account the WHO reports on food borne hazards.

Codex member delegations should carry out a risk evaluation of the most relevant feed related hazards in the different world regions and countries. a) PCB/Dioxin and b) Heat treatment or chemical treatment to kill

salmonella etc. FEFAC raised the question to the item new technologies. It refers to plant biotechnology in wider sence. Toxic substances linked to pollution from environmental contamination, recycling or process water is important.

4. MINERALS, SUPPLEMENTS, VETERINARY DRUGS AND OTHER ADDITIVES

4.1 .Minerals, supplements, veterinary drugs and other additives should be obtained from reputable manufacturers who guarantee the concentration and purity of ingredients and provide instructions for correct use.

Argentina - Any minerals, supplements, veterinary medicines and other additives which may be used in the preparation of animal feed must be duly registered with the competent official body in accordance with current legislation in order to guarantee the concentration and purity of their components and/or active principles and must provide instructions for their correct use.

Canada suggests the following additional detail is recommended: "Monitoring of ingredients should include inspection and sampling of ingredients for contaminants using risk based protocols. Laboratory testing, where undertaken, should be by standard methods. Ingredients should meet acceptable, and if applicable, statutory standards for levels of heavy metals and other contaminants which may give rise to human health hazards."

Denmark suggests:

All additives in feedingstuffs should be approved with conditions for use

Clarification on the use of different categories in animal nutrition (feed ingredients, additives and veterinary medicine) in order to avoid dual uses.

Sweden suggests that "Antibacterials should not be used in feedingstuffs for growth promoting purposes."

Minerals (macro- and microminerals) used as feedingstuffs should in principle be free of impurities such as heavy metals, dioxins etc.

Labelling of feedingstuffs should include clear instructions for use and when appropriate safety instructions as well."

FEFAC would propose to complete these two chapters in specifying the purchase and delivery conditions for feed materials, premixes and/or additives and veterinary medicinal substances. Their monitoring at plant level should ensure that these products are:

Traceable;
Of conform quality;
Delivered in conditions allowing these to be used for the manufacture of premixes and/or compound feeds in agreement with the legal safety requirements and the quality objectives of the plant concerned;
Delivered by an approved supplier where raw materials production is covered by an approval legislation.

In order to control the safety and quality of animal feeds, each plant shall have a standard specification mentioning the characteristics – including bacteriological quality – required for each feed material, additive and veterinary medicinal substance and/or premix bought outside. When Codex Alimentarius Standards are in place (e.g. Aflatoxin B1 in certain feed materials and animal feed), the production standards cannot drop below the adopted Codex standards.

A record shall be kept of the origin of each ingredient. Each feed material must have a written specification, which is regularly updated. In addition to the nutritional and analytical characteristics of the feed material, this written specification should include a list of approved origins and sources, details of any processing that

the material has undergone, types of feedingstuffs in which use it is approved, notes on any hazards or limitations (anti-nutritional factors) and any special characteristics of the feed material.

Each batch of additives and veterinary medicinal substances and premixes delivered to the plant must be traceable according to the procedure used in the company. A system of silo allocation shall be put in place so as to ensure that additives and veterinary medicinal substances, as well as premixes, are safely stored, guaranteeing that they are to be easily identified, to avoid being mixed up with other additives and veterinary medicinal substances or premixes and to comply with the first-in-first–out principle, using the ultimate date of incorporation as criteria.

Sampling and analyses plans must be established to cover all incoming ingredients.

IDF wants the woording reputable deleted and GMP rules inserted.

5. GENERAL MANAGEMENT OF FEEDS

FEFAC considers that this chapter needs a complete overhaul to become meaningful and applicable by operators.

The following approach has been laid down in the FEFAC guidelines for the implementation of a code of practice for the manufacture of animal feedingstuffs (cf. Annex to our letter (99) 54 sent to Codex Secretariat on 22 December 1999). This approach may serve as a platform or model for the discussions of the Codex task force.

General and specific requirements should be laid down for the following activities & functions carried out and involved in the safe production of animal feed:

Production facilities and equipment
Personnel
Documents and records
Feed formulation
Production (Weighing, grinding, Mixing, pelleting/Heat treatment, Cooling, Storage, Product returns)
Transport and storage of finished products
Complaints and product recall

5.1. Feeds should. be stored so as to prevent deterioration and contamination.

Argentina - The feed must be stored under adequate hygienic and sanitary conditions in order to prevent its deterioration and contamination.

5.2. Processed feeds should be separated from unprocessed ingredients.

Argentina – Finished products (prepared feed) must be separated from the ingredients and/or raw materials sector and the preparation sector.

Canada proposes: "Processed feed should be stored separately from unprocessed ingredients".

5.3. Containers and equipment used for transport, storage, conveying handling and weighing should be kept clean.

Argentina – The equipment used for transport, storage, transfer, handling and weighing must be kept under hygienic sanitary conditions.

5.4. Equipment should be 'flushed' with 'clean' feed material between batches of different formulations to control cross contamination.

Australia suggests the following :

Equipment should be subjected to effective procedures between batches of different formulations to control cross contamination.

Labels should be consistent with any statutory requirements and should describe the feed, specify the type of animals the feed is intended for and provide instructions for use.

We also suggest that an additional sentence as follows be added to this section;

" Effective recall procedures should be in place in cases where a hazardous risk has been identified in a product."

Canada suggests revising the wording:

"Equipment should be subjected to reasonable and effective procedures between batches of different formulations to control cross contamination, including physical means (vacuuming, sweeping, washing) and/or flushing and/or sequential production of feed, or other equally effective procedures."

5.5. Pathogen control procedures, such as pasteurization or the addition of an organic acid to inhibit mould growth, should be used where appropriate and results monitored.

U.S. support the use of pasteurisation (heat treatment) and organic acids when appropriate but opposed the required use of either without a documented need.

5.6. Apart from feeds fed moist, such as silage and by-products of brewing, ingredients and feeds should be kept dry to limit fungal and bacterial growth. This may necessitate ventilation and temperature control.

5.7. Waste and unsaleable material should be isolated and identified, and only recovered as feed after freedom from hazardous contamination has been assured. Waste and unsaleable material containing hazardous levels of veterinary drugs, contaminants or any other hazards should be disposed of in an appropriate and, where applicable, statutory manner and not used as feed. If freedom from hazardous contaminants cannot be established, the material should be destroyed.

Argentina – The word "waste" means something that no longer serves any purpose, which is why this point needs to be clarified where it is specified that it is recuperated as feed.

Canada suggests the following additional detail:

"Feeds containing medications may only be used as an ingredient in a feed containing the same medication and that feeds containing ruminant meat and bone meal may only be used as an ingredient in feeds intended for feeding to non-ruminants."

5.8. Packaging materials should be newly manufactured unless known to be free of hazards that might become feedborne.

Argentina – The packaging used for preparing the feed must be in use for the first time.

Canada suggests the following additional detail:

"Packaging materials previously used for medicated feeds should only be re-used bags used to package feeds containing the same medication and that packaging materials previously used for non-ruminant feeds only be re-used for packaging non-ruminant feeds."

5.9. Labels should be consistent with any statutory requirements and should describe the feed and provide instructions for use.

Argentina – The tags and/or labels must comply with all regulatory requisites and must provide a description of the feed and instructions for use.

5.10. Feeds should be delivered and used as soon as possible after manufacture.

Argentina – The feed must be consumed before the expiry date specified on the packaging

Canada suggests insertion of a new section:

Records

"Feed manufacturers should maintain records including master formulae, mixing sheets, daily production logs, inventory records, labels, invoices, file of complaints, file on manufacturing errors and corrective actions taken, analytical results and investigations of out of tolerance sample results, records respecting the disposition of returned and recalled feeds, records of the disposition of flush or recovered material**,** records of mixer validation and scale/metering device verification, etc**.**"

6. PERSONNEL

6.1. All plant personnel should be adequately trained and should work to GMP standards.

IDF proposes that personnel should be familiar with the GMP Code. Staff should have appropriate qualifications and be trained and accredited in any procedure.

GOVERNMENT COMMENTS IN RELATION TO THE FOOD SAFETY ISSUES IDENTIFIED BY THE CODEX ALIMENTARIUS COMMISSION IN THE TERMS OF REFERENCE

MATTERS REGARDING OTHER ASPECTS OF FOOD SAFETY IN ANIMAL FEEDING IN ADDITION TO CURRENT CODE OF PRACTICE

The Netherlands is of the opinion that FAO/WHO should be invited to examine the necessity of establishing in due time a more permanent world forum on the quality of animal feed e.g. a special Committee for the Codex Alimentarius "Animalium"

The U.S. finds it important that all appropriate NGOs participate in the work of this task force**.**

The U.S. requests that the Chairman consider including a copy of this Expert Consultation in his pre-meeting working document. This Expert Consultation contains much of the detail and explicit advice that is absent from the Draft Code. They also support inclusion of model language for GMPs and/or references to publications from associations representing the feed industry in various countries.

The U.S. believes that it is vitally important for the success of the efforts of the Working Group to clearly define, prior to the meeting in Copenhagen, whether the focus of the document will bee feed manufacturing and hazards associated with feed or on-farm animal feeding practices, to enable the participating countries to have the correct group of experts present at the meeting.

The U.S. also encourages the inclusion of basic information on assessing the risk associated with products used in feed manufacturing in an accompanying document.

[3]

[3] IDF International Dairy Federation
IFIF The International Feed Industry Federation
CI Consumers International
FEFAC Fédération Européenne des Fabricants d'Aliments Composés