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-Add.1**
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

***AD-HOC* INTERGOVERNMENTAL CODEX TASK FORCE ON ANIMAL FEEDING**
First Session
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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 prepared by the Chairman of the *Ad Hoc* Intergovernmental Codex Task Force on Animal Feeding is an addition to CX/AF 00/4 and summarizes government comments submitted **after April 15, 2000** 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.

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

DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING

TITLE

The European Community believes that the scope of the Code needs to be more specific

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.

The European Community suggests that the Code should be clearly addressed to the whole feed chain, including producers, traders, transporters, processors and consumers (i.e. farmers) of compound feedingstuffs and feed materials. There should be a clear demarcation between the parts of the Code, which cover the manufacture of feeds, the use of feeds, and good feeding practices by farmers. The types and areas of risk could be more clearly specified in each case.

COMISA would like to compliment the Task Force on this initiative and supports, in principle, the general statements made in the Draft Code. At this time there is no major objection to the approach that is proposed.

IFIF had the following comments to the Code's Objective - One set of standards that apply equally to the production of all feedingstuffs no matter when or where they are produced - that is, in a purpose built factory or on-farm. The Code must meet all feed requirements based on the belief that all food produced from livestock must be safe.

Maroc suggests that the Code follow the drafting procedures for elaboration of Codex documents: scope, definitions, general principles etc.
The Code should cover all animals including poultry and aquatic cultures

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.[1]

[1] 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 European Community suggests that the Code should particularly stress the importance of implementing HACCP principles, as developed in Codex document "Recommended international code of practice general principles of food hygiene" [2] (1997) into the feed chain.

In order to make the meaning and the terminology of the Code clear and unambiguous, it is proposed define the types of products which are included (compound feedingstuffs, feed materials, additives, etc).

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 European Community suggests that the Code should also distinguish better between '*general management*' and '*general management of feeds*'.

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

COMISA believes that it is critical that there is the element of "traceability" imposed in the Code and recommends that this is inserted at the beginning of the third bullet point under "General management" in the document to read:

"For the purpose of traceability, records will be maintained…"

Maroc proposes to register all suppliers of raw materials, ingredients and animal feedingstuffs as well as the final users in order to secure traceability.

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.

The European Community proposes that **t**he Code should be more explicit with regard to the importance of labelling rules. For instance the European Community feedingstuffs legislation lays down rules on the labelling of feed materials and compound feedingstuffs, ensuring that feedingstuffs are used properly and that farmers receive the information they expect

[2] CAC/RCP 1-1969, Rev. 3, page 36 to 49

The Code should include the principle of minimising the presence of undesirable substances in feedingstuffs.

The Code should include a list of prohibited ingredients, i.e. substances which bear a general risk for human and animal health, in animal feed (‘*negative list’*).

The Code should emphasise the importance of auto-controls performed by the feed industry itself Good Manufacturing Practice (GMP).

The Code should mention that compliance with any mandatory rules should be checked by monitoring authorities at any stage of the manufacture of products intended for animal nutrition.
It should make clear that it must be embedded in legislative infrastructure.

The obligation foreseen by the Code to record all the ingredients should be modulated according to the type of ingredient, according to a risk analysis.

The provisions of the Code on the monitoring of raw materials of animal or vegetable origin for the detection of possible contaminants should be extended to all types of raw materials, including minerals.

The provisions on the methods of analysis and the need to respect acceptable levels for pathogenic agents and undesirable substances in raw materials should be extended to compound feedingstuffs and possibly to any other type of ingredient (additive or pre-mixture).

The Code should emphasise the need for good storage and handling of feeds and their ingredients in order to prevent the entry of pests and other sources of spoilage, for example moulds resulting from undue moisture.

IFIF discussed a global 'positive' list of feed raw materials against which all materials considered for use in animal feeds should be checked. Minimum limits should be avoided, as they would differ between raw materials, livestock species, regions and manufacturing equipment being used. Identifying undesirable substances and establishing maximum levels, if achievable, would be more useful to feed manufacturers.

A global Good Manufacturing Practices (GMPs) document should be ranked in order of priority: Food safety, science-based decisions, practical GMPs, uniform sampling/analysis (GAFTA contract procedures could be helpful here), variation limits and global tolerances for undesirable substances.

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.

The European Community suggests that the Code should mention the types of additive used in the manufacture of compound feeds, which are included in the scope of the Code.

The Code should clearly lay down the need for conditions of use of additives to be established and followed

in order to prevent negative effects for animal or human health.

There should not be any doubt that the additives, genetically modified Organisms (GMOs) and GMO-derived materials must have been assessed and approved against the basic criteria of safety (human, animal and environmental), controllability and effectiveness by national or other bodies. In this respect the European Community has clear rules concerning the use of additives in feeds, as well as measures covering bio-proteins.

The Code should not make reference to medicinal feedingstuffs.

5. GENERAL MANAGEMENT OF FEEDS

IFIF had the following comments:

5.1 "Cross contamination should be controlled"

5.7 should be redrafted: "Waste and unsaleable material should be isolated and identified and only recovered as feed after tolerance levels 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 tolerance levels from hazardous contaminants cannot be achieved the material should be destroyed"

5.8 should have the words deleted: "newly manufactured unless known to be"

Maroc finds that the Code should specify that packing material does not change the composition or stability of feedingstuffs.

Analysis of raw materials should be performed by reference methods.

Feedingstuffs must be stored under proper conditions to avoid detoriation and contamination.

Manufactured feedingstuffs must be stored and separated from raw materials, ingredients and packing material.

Heat treatment or treatment with organic acids to prevent growth of mould or bacteria should be performed under well-established conditions. The effect must be controlled and the result registered.

Labels must contain information about composition, animal category, intended use, preservation and storage conditions, and use-by date.

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 European Community suggests that the Code should define the term '*undesirable substances in feedingstuffs'* referring particularly to substances which might pose a risk for public health.
Codex should lay down a list of these undesirable substances. The Code should fix maximum authorised levels of these undesirable substances for compound feedingstuffs, feed materials and feed additives on the basis of a risk analyses inclusive the transfer rates. Pesticides should also be taken into account.

Feed additives: The Code should include conditions for allowing 'additives'. It should fix maximum limits for 'additives', if necessary with respect to human or animal health.

Microbial resistance: The Code should consider the prohibition of antibiotics in feedingstuffs for growth promoting purposes on the basis of scientific evidence.

Rapid alert system: The Code should consider a '*rapid universal warning system on the basis of a risk assessment in case other countries are involved*.

Codex *Animalium* Committee*:* FAO/WHO should examine the necessity of establishing a permanent world forum on the quality of animal feed (Committee for a Codex Alimentarius "*Animalium").*

[3]

[3] COMISA Animal Health Industry. Manufacturers of Veterinary Medicine
IFIF The International Feed Industry Federation