codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 3 **CX/AF 03/4**
November 2002

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD-HOC INTERGOVERNMENTAL CODEX TASK FORCE ON ANIMAL FEEDING

Fourth Session

Copenhagen, Denmark, 25 - 28 March 2003

PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING

Comments at Step 3

Comments from: Australia, Canada, Egypt, New Zealand, Norway, Switzerland, United States, European Community, International Union of Microbiological Societies - International Committee on Food Microbiology and Hygiene(IUMS-ICFMH), International Dairy Federation (IDF) and International office of Epizootics (OIE) in response to CL 2002/26-AF, Part B

GENERAL COMMENTS

Australia

Australia encourages the development of a Code that adopts wide principles. This not only allows ease of compliance, but also allows individual states to further adopt more prescriptive regulation if they so desire.

It is important, in developing the code, to keep in mind that the measures to be put in place are primarily focused on food safety.

Australia supports the inclusion of HACCP, GMP and GAP in the code as appropriate. This is in recognition that in different situations, any one or all three may be the more appropriate mechanism to apply.

We hold the understanding that sections 5 and 6 of the Draft Code will be reorganised by the drafting group.

Norway

The term “livestock” should be replaced by “animal” since the code also includes fish. A revision of the code “on farm use” is necessary to make it more applicable to aquaculture. The term “veterinary drugs” is preferred instead of “medicaments”.

European Community

This code apply to all animals including fish, for this reason the term “livestock” should be replaced by “animal”.

The terms “veterinary drugs” should be used instead of “medicaments”.

IDF

Feed production is an integrated part of food production. The safety of food is the result of the continuum of control measures applied throughout the whole food chain, including the production of feeds and feed ingredients.

As is explained in our comments on the previous draft Code of Practise on Good Animal feeding in 2001, IDF is of the opinion that for the control of hazards that may occur in foods, GAP, GMP and HACCP are indispensable in the feed chain. For the primary production and on-farm processing and storage of crops, GAP and GMP codes should be established, which are developed by following the HACCP-principles.

On the other hand, IDF is aware that HACCP and GAP- and GMP-codes, which are based on the HACCP-principles, are difficult to implement under all production condition for feed and feeding ingredients in the world. The wording of the draft code in the paragraphs which deal with GAP, GMP and HACCP is apparently taking this limitation into account.

For the time being we therefore restrict ourselves to the following specific comments.

ICFMH/IUMS

The *ICFMH/IUMS* appreciates the considerable progress made with regard to hygienic safe feed manufactoring throughout the food chain, ultimately resulting in safer food.

SPECIFIC COMMENTS

SECTION 1 - INTRODUCTION (para. 1)

Canada

While the development of a feed safety system is intended to positively impact on food safety, the code being developed applies only to feed manufacture and subsequent animal feeding and does not cover the whole food chain. So that the introductory statement describes what the code does; not what it is intended to do, Canada suggests rewriting the first sentence as follows:

> *This code provides recommendations for the establishment and maintenance of a feed safety system for food producing animals which covers the whole feed chain (production and use), taking into account relevant aspects of animal health and the environment, in order to minimize risks to the health of consumers.*

SECTION 2 - PURPOSE AND SCOPE (paras. 2-5)

Norway

Norway supports the view that animal health, animal welfare, and the environment should be regarded as legitimate in the context of animal nutrition. Further cooperation with OIE should be considered.

SECTION 3 - DEFINITIONS (para. 6)

Canada

Products which are marketed "to improve animal performance" are considered veterinary drugs. Accordingly the definition of feed additive should be modified to remove the portion in square brackets as follows:

> ***Feed additives:*** Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has a nutritive value, which affects the characteristics of feed or animal products.

Given that many feeds are marketed in bulk and are not "labelled" in the traditional sense of the word, it may be useful to include a definition of a label in the Code. Canada proposes the following definition for a label:

> ***Label:*** includes any legend, word, mark, symbol or design applied or attached to, included in, belonging to or accompanying any feed or feed package.

Egypt

- Feed (feedingstuffs)

EOS inquires: what is the value of using "directly" in the definition of "feed"?.

- Feed Additives

EOS suggests the insertion of "positively" before "affects" to become as follows:

" .... which positively affects the characteristics of feed or animal products".

United States[1]

For the purpose of this Code:

> ***Feed additives:*** Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has a nutritive value, which affects the characteristics of feed or animal products ~~[or is intended to improve animal performance].~~

Rationale: Strike "or is intended to improve animal performance" because this claim included in medicated feed claims or veterinary drug claims.

SECTION 4 - GENERAL PRINCIPLES AND REQUIREMENTS (paras. 7-8)

United States[2]

> Feed and feed ingredients should be obtained and maintained in a stable condition so as to protect feed and feed ingredients from contamination by pests, or by chemical, physical or microbiological contaminants or other objectionable substances during production, handling, storage and transport. Feeds should be in good condition and meet generally accepted quality standards where appropriate good agriculture practices (GAPs), good manufacturing practices (GMPs), and/or hazard analysis and critical control point (HACCP) principles[2] ~~should be followed to control hazards that may occur in food~~ may be acceptable means for identifying, evaluating, and controlling hazards which are significant for food safety to protect consumer health. Potential sources of contamination from the environment should be considered.

Rationale: Strike "should be followed to control hazards that may occur in food" and add "may be acceptable means for identifying, evaluating, and controlling hazards which are significant for food safety to protect consumer health" to clarify the use of these practices. This is also language from Section III – *Primary Production* of the Recommended International Code of Practice General Principles of Food Hygiene CAC/RCP 1-1969, Rev. 3 (1997) amended 1999, Section 3.2, *Hygienic Production of Food Sources*.

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1 New additions are underlined; old parts are struck through; only changed sections are included

2 New additions are underlined; old parts are struck through; only changed sections are included

IDF

In the first para. (7) the sentence "where appropriate, GAPs, GMPs and/or HACCP principles should be followed to control hazards that may occur in food" is not entirely correct. HACCP can never replace GAPs or GMPs but can apply on top of these as a management system to focus on key issues. Consequently, the words "and/or" need be replaced with "and, where applicable,". The same applies to par. 29 and 30 of Section 5.

SECTION 4.1 - FEED INGREDIENTS (para. 9)

Australia

> 9. Feed Ingredients should be obtained from safe sources [and be acceptable, following a safety assessment where derived from new technologies].

Requirement for a safety assessment for ingredients derived from new technologies is not necessary. The first part of the sentence requires that food be derived from safe sources; accordingly, the second part of the sentence should be deleted.

New Zealand

New Zealand is opposed to the inclusion of the words in square brackets in paragraph 9. We believe that the opening sentence is clear enough. The critical requirement is that feed ingredients should be obtained from safe sources. The inclusion of the words in square brackets make the presumption that feed ingredients manufactured using new technologies are inherently unsafe. Such a requirement is inconsistent with the risk analysis framework of Codex.

New Zealand supports the rest of the paragraph.

Norway

Point 9

- A list of feed ingredients that are banned in animal nutrition should be established at the international level;
- Appropriate criteria for establishing a Positive List of ingredients should be considered;
- The wording “pathogens, mycotoxins, pesticides and contaminants” should be replaced by “undesirable substances”;
- The principles established in the Codex rules for risk analysis for food derived from new technologies, should apply also for feed as well as for feed additives.

United States[3]

> 9. Feed ingredients should be obtained from safe sources ~~[and be acceptable, following a safety assessment where derived from new technologies]~~. Manufacturers ……..

Rationale: Obtaining feed ingredients from safe sources implies that some ingredients may need a safety assessment before being used in feed, thus the phrase in brackets is not needed.

[3] New additions are underlined; old parts are struck through; only changed sections are included

European Community

The European Community strongly believes that the Task Force should draw up a list, at international level, of feed ingredients that are banned in animal nutrition. This is crucial for the effective implementation of this code at international level. Therefore the list included in Annex I is proposed. In line with its position as expressed in paragraph 75 of the report on the third session of the TFAF, the European Community would like to create a drafting group to draw up a negative list of feed ingredients banned in animal nutrition. The list proposed in Annex I, and any other proposals submitted by other member countries, may serve as a basis for drawing up such a list, which must contain some basic ingredients such as mammalian protein for feeding to ruminants and other products for which such a ban may be internationally acceptable.

For countries wishing to draw up a positive list of ingredients (non-additives), appropriate criteria should be considered within the framework of the Task Force. In this regard, the EC proposes the following criteria:

"Feed and feed ingredients must:

- *not have adverse effects on human health;*
- *not mislead the user;*
- *be clearly identified and defined."*

ANNEX I

1. Faeces, urine as well as separated digestive tract content resulting from the emptying or removal of the digestive tract, irrespective of any form of treatment or admixture.
2. Hide treated with tanning substances, including its waste.
3. Seeds and other plant propagating materials which, after harvest, have undergone specific treatment with plant protection products for their intended use (propagation), and any derived by-products.
4. Wood, sawdust and other materials derived from wood treated with wood protection products.
5. All wastes obtained from the various phases of the urban, domestic and industrial waste water (*) treatment process, irrespective of any further processing of these wastes and irrespective also of the origin of the waste waters.
6. Solid urban waste, such as household waste.
7. The packaging and parts of packaging from the use of products from the agri-food industry.
8. Protein derived from mammalian tissue as an ingredient in compound feeding stuffs for ruminants, excluding, those products that after risk assessment are considered safe.

Point 9: Replace the first sentence by the following:

"Feed ingredients should be obtained from safe sources.

Additives and ingredients from new technologies, including feeds derived from modern biotechnology, should follow risk assessment (which includes safety assessment). The risk analysis process should be consistent with the Codex Working Principles for Risk Analysis.

Regulatory authorities may conduct, for ingredients from new technologies, risk management measures that may include, as appropriate, conditions for marketing approvals and post-market monitoring"

Comment: The draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology, provides for risk analysis to assess potential risks for foods derived from modern biotechnology. The conduct of risk analysis is guided by the Codex Principles for Risk Analysis. In addition, the Draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology, states that regulatory authorities may also conduct risk management measures for these products.

For food additives, the Joint FAO/WHO Expert Committee on Food Additives (JECFA) has been meeting since 1956 to evaluate the safety of food additives. Although JECFA does not provide for the evaluation of feed additives, the Code of Practice on Good Animal Feeding should at least establish that Member Countries conduct safety evaluation for feed additives. Therefore, the same principles for food established in the Codex rules should apply for feeds derived from new technologies as well as for feed additives.

OIE

9. Feed Ingredients should be obtained from safe sources ~~[and be acceptable, following a safety assessment where derived from new technologies]~~. …….

ICFMH/IUMS

The joint FAO/WHO Expert Committee on Food Additives (JECFA) is providing information and setting limits for undesirable substances in food based on current available information on toxicity of the compound in question, dietary intake analyses and - much more - providing the society with unbiased information on high scientific level. The input from feed in the food chain is only partly covered by JECFA. Feed is the very first step in the food chain and the ICFMH/IUMS strongly supports activities whereby the input of unwanted substances is reduced in feed and thus also ultimately in foods. We for that reason fully endorse and support the short point five in the one page on "SUMMARY AND CONCLUSIONS", page iv of the Alinorm 03/38, as further reflected in paragraphs 29 and 75 – 77 of the report. It is an urgent matter to improve feed safety as related to safe food, which should be given high priority.

SECTION 4.2 - LABELLING (paras. 10-11)

Australia

10. Labelling or the accompanying documents, should contain, where appropriate:

- a list of feed ingredients, including appropriate reference to additives, in descending order of proportion,

There is a possible logistical issue with the requirement that the listing of feed ingredients be in descending order of proportion. Feed formulations change with the availability of raw materials and compliance with such a clause would be onerous, requiring the reprinting of labels for every formulation change.

It is preferred that labelling requirements accept lists of ingredients where raw materials are stated as 'Compounded from…'. That is, a list of ingredients which the feed may contain.

11. [Genetically modified organisms and derived products should be labelled].

Genetically modified organisms should not need to be specifically labelled, as there is no scientific evidence to suggest that they present a risk to food safety. This sentence should therefore be deleted.

Canada

Canada notes that some of the proposed labelling requirements are not related to the intent of the Code, i.e., to ensure that feed does not negatively impact on consumer health. In terms of food safety, products should be labelled to provide sufficient information for correct use, as well as to provide adequate information so that the product can be traced in the event of a recall.

Accordingly, this section should only list the information required on a label to meet the objective of food safety.

Canada proposes the label requirements be limited to:

- information about the species or category of animals for which the feed is intended,
- the purpose for which the feed is intended,
- contact information of manufacturer or registrant,
- registration number if available,
- directions and precautions for use,
- lot identification,

Given the use of least-cost formulation by the feed industry, the requirement for a list of ingredients on the label can be problematic. Further, since only ingredients approved by the competent authority may be used in feed, there is no additional consumer health benefit to requiring a list of ingredients on the label. Thus, the requirement for including a list of ingredients on feed labels should not be included in the Code.

The relationship between the requirement for a "use before or expiry dates" and consumer health is unclear. Thus, the requirement for including this information on feed labels should not be included in the Code.

The statement "[Genetically modified organisms and derived products should be labelled.]" should be removed from this section. As feed and feed ingredients derived from biotechnology would have undergone a review by the competent authority prior to their use, they would have demonstrated safety for the intended use in feed. Accordingly, highlighting presence of products of biotechnology in the feed, on the label, provides no additional consumer health benefit and should not be a requirement of the Code.

New Zealand

New Zealand's main concern relates to the absence of any clear statement regarding the purpose of labelling in the context of the Code. In this context the purpose of labelling is to ensure that animals consuming the feeds do not present a risk to human health. We suggest that the first sentence of paragraph 10 be amended as follows:

> "Labelling should be clear and informative as to how the user should handle, store and use feed and feed ingredients so that consumption of the animals or their products will not present a risk to human health."

Norway

Point 10

In the second sentence, feed ingredients should be added to cover labelling requirements of feed additives.

Point 11

Norway supports that regulatory authorities may conduct risk management that may include labelling of feed and feed ingredients derived from new technologies.

United States[4]

~~[Genetically modified organisms and derived products should be labelled.]~~

[4] New additions are underlined; old parts are struck through; only changed sections are included

Rationale: Strike the sentence "Genetically modified organisms and derived products should be labelled" because prior to marketing for this purpose feed and feed ingredients derived from modern biotechnology would have demonstrated safety for the intended use in feed. Further, a requirement for specific labeling would need to have a human safety objective while none is stated here. In the United States GMO or genetically enhanced products are statutorily approved for use based on assessments that consider human and animal health and safety.

European Community

Point 10. Replace the first paragraph by the following:

> *"10. Labelling should be clear and informative as to how the user handle, store and use feed and feed ingredients. Labelling should be consistent with any statutory requirements and should describe the feed or feed ingredient and provide instructions for use. Labelling or the accompanying documents, should contain, where appropriate:"*

Comment : The second sentence only refers to "feed" and is inconsistent with the rest of the paragraph that refers to "feed and feed ingredients". For this reason, propose to add the words "feed ingredients" that will cover also the labelling of feed additives.

Point 11. Replace this point by the following:

> *"Regulatory authorities may conduct, risk management measures that may include, as appropriate, labelling of feed or feed ingredients from new technologies. Regulatory authorities may decide that feed and feed ingredients consisting, containing or produced from GMOs should be labelled with references to the genetic modification.*

Comment: Draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology, states that regulatory authorities may also conduct risk management measures. The EC does not see the necessity to mention the Codex Committee on Food Labelling in relation to the labelling of feed derived from new technologies, as far as this Codex Committee deals only with food. It is preferable to leave this issue open to the regulatory authorities.

OIE

> 11. ~~[Genetically modified organisms and derived products should be labelled.]~~

ICFMH/IUMS

11. **"***Genetically modified organisms and derived products should be labelled"* is placed in square brackets. Delete the brackets. If it is safe to use there is no reason not to label the content, in so far as many consumers plead for openness on the issue.

SECTION 4.3 - TRACEABILITY (PRODUCT TRACING) AND RECORD KEEPING OF FEED AND FEED INGREDIENTS (paras. 12-13)

Australia

> 12. Traceability (product tracing) of feed and feed ingredients, including additives, should be enabled by proper labelling and record keeping at all stages of production and distribution.

We prefer the term product tracing as it maintains a focus on the food safety aspects of the code. Furthermore, it is a preferred term due to traceability currently being considered by the Codex Committee on General Principles and the Codex Committee on Food Import and Export Certification and Inspection Systems.

New Zealand

New Zealand welcomes the modifications to this paragraph at the 3rd session. In particular New Zealand supports the inclusion of the term "product tracing" as a more accurate term to describe the process of tracing products/ingredients where human health and safety concerns are clearly identified. New Zealand also suggests that any text in relation to product tracing should be qualified by references to work elsewhere in Codex, namely the Codex Committee on General Principles.

With regard to the words in square brackets "and representative samples of feed and feed ingredients should be kept where applicable", New Zealand believes that such a requirement is too prescriptive and impractical given the huge diversity of feeds and feed ingredients. Such a prescriptive requirement would also be inconsistent with the outcomes based approach being increasingly followed in Codex texts. For these reasons New Zealand suggests that the words in square brackets in paragraph 12 be deleted.

Norway

Representative samples of feed and feed ingredients should be kept where applicable, and the brackets should therefore be deleted.

United States[5]

> ~~[Traceability (product tracing) of feed and feed ingredients, including additives, should be enabled by proper labeling and record keeping at all stages of production and distribution. This should]~~ Systems should be in place to facilitate the prompt trace-back or trace-forward of materials and products if any actual or potential health risks are identified, and prompt and complete withdrawal or recall of products where necessary. Records should be maintained one step forward and one step back at all stages of the production and distribution chain, and readily available regarding the production, distribution and use of feeds and feed ingredients for as long as appropriate to enable trace-back should a human food safety problem emerge. ~~[and representative samples of feed and feed ingredients should be kept where applicable].~~

Rationale: We added the phrase "one step forward and one step back" to clarify the intent that the person receiving a product should know where it was obtained and to whom it was sold/given. We struck the phrase in brackets "and representative samples of feed and feed ingredients should be kept where applicable" because it is not practicable on-farm and because a specific human food safety objective is not identified.

The opening statement on "traceability (product tracing)" is deleted because specific work is underway in the Codex Committee on General Principles and the Codex Committee on Food Import and Export Certification and Inspections Systems should be allowed to define the topic of traceability (product tracing) for several Codex groups; no definition for traceability/product tracing exists. Therfore, it is premature to conclude that traceability/product tracing is a necessary component of feed production and distribution; traceback as detailed in the subsequent sentences will be adequate to manage a food safety issue that might arise.

European Community

Point 12. Remove the brackets and replace the sentence in brackets by the following:

> *"and representative samples of feed and feed ingredients should be kept where applicable for a suitable period of time".*

Comment: For the purposes of control and traceability, samples of feed ingredients and batches produced by the feed establishments should be kept for analysis, if necessary. This is a normal practice in the feed industry that should be incorporated into the code.

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5 New additions are underlined; old parts are struck through; only changed sections are included

OIE

12. ~~Traceability (product tracing) of feed and feed ingredients, including additives, should be enabled by proper labelling and record keeping at all stages of production and distribution~~. **Systems should be in place to** ~~This should~~ facilitate the prompt trace-back or trace-forward of materials and products if any actual or potential health risks are identified, and prompt and complete withdrawal or recall of products where necessary. Records should be maintained and readily available regarding the production, distribution and use of feed and feed ingredients for as long as appropriate to enable trace-back should a **human food** safety problem emerge, ~~[and representative samples of feed and feed ingredients should be kept where applicable].~~

SECTION 4.3.1 - SPECIAL CONDITIONS APPLICABLE TO EMERGENCY SITUATIONS (para. 14)

Norway

Norway supports the idea of establishing a rapid alert system for exchange of information on feedingstuffs that may pose a danger to human health. However, a more simplified notification system may be more realistic.

United States[6]

14. Certain additional actions may become necessary in an emergency situation or where high-risk ingredients are concerned. In such circumstances and in order to control the spread of specific pathogens or the presence of other undesirable substances ~~or products~~, it may be necessary to specify, for any feed ingredient, certain product-specific information such as the country of origin and species of animal and any treatment process used prior to purchase. Care should be taken to preserve the identity of such material after procurement to facilitate any ~~checking~~ inspection that might be required.

Rationale: The words "certain product-specific information such as" is added because the examples provided would not be useful in all cases nor would they necessarily be an exhaustive list. The removal of the words "or product" and "checking" and the addition of the word "inspection" increase the clarity of the section.

European Community

Point 14. Replace point 14 by the following:

"Operators should immediately inform the competent authorities in the member country if they consider or have reason to believe that a feed or feed ingredient does not satisfy the feed safety requirements established in this code. The information should be as detailed as possible and should at least contain a description of the feed or feed ingredient, the species for which it is intended, the lot number, the name of the manufacturer, the processing method and the country of origin. The competent authorities and operators should immediately take effective measures to ensure that those feeds or feed ingredients do not pose any danger to human health.

As soon as it becomes likely that a particular feed of feed ingredient is traded internationally and may pose a danger to human health, the competent authorities of the exporting member countries should notify, at least, the competent authorities of the relevant importing countries. The notification should be as detailed as possible and should at least contain the particulars indicated in the previous paragraph."

Comment: Some form of notification arrangement is necessary in order to warn and work together with authorities in other relevant member countries in international co-operation to combat potential threats to the ultimate food consumer via the feed and food chain.

6 New additions are underlined; old parts are struck through; only changed sections are included

OIE

14. (last sentence) Care should be taken to preserve the identity of such material after procurement to facilitate any ~~checking~~ **inspection** that might be required.

SECTION 4.4 - INSPECTION AND CONTROL PROCEDURES (paras. 15-16)

Australia

15. Feed and feed ingredients manufacturers and other relevant parts of industry should practice self-regulation/auto-control to secure compliance with required standards for production, storage and transport. It will also be necessary for official regulatory programmes to be established to check that feeds and feed ingredients are produced, distributed and used in such a way that foods of animal origin for human consumption are both safe and suitable.

The first sentence of this section refers to self-regulation and the second to official regulatory programmes. This is contradictory. Australia has moved to co-regulatory programmes for the feed industry in the last 10-15 years. The preferred wording of the second sentence would be;

"It may also be necessary for official regulatory or co-regulatory programmes to be established to check that feed and feed ingredients are produced, distributed and used in such a way that foods of animal origin for human consumption are both safe and suitable."

Canada

As contaminants are included in the definition of undesirable substances, Canada suggests rewriting paragraph 16 as follows:

16. Monitoring of feeds and feed ingredients, whether by industry of official inspection bodies, should include inspection and sampling and analysis to detect unacceptable levels of undesirable substances.

New Zealand

Again New Zealand is concerned about the potential impact and application of inspection and control procedures. In particular it is important that any inspection and control procedures are proportionate to the hazard. New Zealand would support the inclusion of a footnote reference clarifying that verification is about audit of systems and did not imply inspection of each lot as has been noted in para 54 of Alinorm 03/38.

Norway

Point 15

The text should be amended to stress the responsibility of the official authorities or delegated bodies to establish regulatory programmes on the safety of feed and feed ingredients.

United States[7]

16. Monitoring of feeds and feed ingredients, whether by industry of official inspection bodies, should include inspection and certification and/or sampling and analysis to detect unacceptable levels of ~~contaminants and other~~ undesirable substances.

Rationale: The words "certification and/or" are added because certification may obviate the need for sampling and analysis and is a component of other Codex texts to manage inspection and control issues. Strike "contaminants and other" because contaminants are included in undesirable substance.

[7] New additions are underlined; old parts are struck through; only changed sections are included.

OIE

16. Monitoring of feed and feed ingredients, whether by industry or official inspection bodies, should include inspection and sampling to detect unacceptable levels of ~~contaminants and other~~ undesirable substances.

SECTION 4.5.1 - FEED ADDITIVES AND VETERINARY DRUGS USED IN MEDICATED FEED (paras. 18-22)

Canada

Canada recommends referring specifically to withdrawal times in the last sentence of paragraph 21 as follows:

Feed containing them should be used in strict accordance with clearly defined instructions for use including adherence to required withdrawal times as appropriate.

New Zealand

New Zealand considers that paragraph 21 is too prescriptive and does not recognize the need to assess regulatory requirements on the basis of risk.

United States[8]

18. Feed additives and veterinary drugs medicines used in medicated feed should be assessed for safety and used under stated conditions of use as ~~pre-approved~~ authorized by the competent authorities.

Rationale: We have replaced "pre-approved" with "authorized" because some countries do not have data review or feed additives or veterinary drugs but rather accept another country's review for the safety and utility of the products and therefore do not pre-approve a product. Countries reviewing data for pre-approval also authorize the products use. Therefore, authorize better reflects all countries actions.

European Community

Point 22: the entire paragraph is replaced by the following:

"Antibiotics should not be used in feed for growth promoting purposes, in the absence of public health safety assessment[9]*. Competent authorities may decide not to allow antibiotics in feed for growth promoting purposes."*

OIE

18. Feed additives and veterinary drugs used in medicated feed should be assessed for safety and used under stated conditions of use as ~~pre-approved~~ **authorised** by the competent authority.

SECTION 4.5.2 - FEED AND FEED INGREDIENTS (paras. 23-24)

No comments

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8 New additions are underlined; old parts are struck through; only changed sections are included

9 *WHO Global Principles for the Containment of Antimicrobial Resistance in Animals Intended for Food, June 2000, Geneva Switzerland.".*

SECTION 4.5.3 - UNDESIRABLE SUBSTANCES (paras. 25-26)

Norway

Point 25

- "Competent authorities may ban systematic diluting of undesirable substances in feed" should be added to the present text.

Point 26

- A list should be made on feed ingredients that are banned in animal nutrition. This is crucial for an effective implementation of this code at the international level.

United States[10]

26. The risks of each undesirable substance to the health of consumers should be assessed and such assessment may lead to the setting of maximum limits in feeds and feed ingredients or the prohibition of ~~certain~~ unsafe materials from animal feeding.

Rationale: We have replaced "certain" with "unsafe" because feed ingredients prohibited form use in feed are by definition unsafe.

European Community

Point 25. a new paragraph is included after paragraph 25

"Competent authorities may ban systematic diluting of undesirable substances in feed."

Comment: The EC considers that the practice of diluting undesirable substances may led to high levels in some feeds. It is necessary to minimise undesirable substances entering the feed and food chain by avoiding unnecessary and potential cumulative effects on public health.

Point 26.

Comment: See comments in point 9.

IDF

In the first para. (25), the term "assessed" should be replaced with the term "validated". The difference between these two terms is significant: The use of the term "assessed" will be understood as the (passive) evaluation of the effect of the control measures, while the term "validated" will be understood as the (active) demonstration that the intended level of control can be achieved by the control measure. Guidelines for the validation of control measures are currently being developed by the Codex Committee on Food Hygiene.

Further, a risk management principle should be added to section 4.5.3, as follows:

"The control of undesirable substances, in particular human hazards that may occur in food, should be addressed along the whole food chain. Main efforts in their control should take place at the step(s) along the food chain, where control is possible and most cost-effective. Monitoring should be addressed throughout the food chain, as appropriate."

[10] New additions are underlined; old parts are struck through; only changed sections are included

ICFMH/IUMS

The committee is very firm in its position towards the possibilities for application of the dilution principle which the sentence *"Control measures applied to reduce unacceptable levels of undesirable substances should be assessed in terms of their impact on food safety",* opens up. It is unacceptable to apply dilution to reduce the levels of toxic components in a consignment of feed declared unfit as animal feed.

Detoxification may be used in some cases, e.g. if certain mycotoxins are present in unacceptable levels, provided that the detoxification does not lead to the formation of toxic metabolites, and provided a technique is available for the detoxification of the mycotoxin in question or of other components.

A consignment of feed should of course only be declared unfit if investigations using "Good Sampling Practice" and approved of methods of analysis proves this (ref. **Section 7).**

The application of dilution to reduce the level of a toxic components in feeds which exceed acceptable levels, whether it is toxins or chemicals, is ethically as wrong as can be. It would only lead to increased pressure on both the environment as well as the safety of food and is thus unacceptable.

The text of the paragraph therefore has to be modified to exclude the dilution possibilities.

SECTION 5 - INDUSTRIAL PRODUCTION OF FEEDS AND FEED INGREDIENTS SECTION (paras. 27-31)

Australia

> 30. (xi) …In cases where the risk linked to cross-contamination is high, completely separate production lines, and storage and transport, should be introduced.

This section should reflect that there are other methods of ensuring that risks are adequately controlled. Examples include proper sequencing or flushing.

Canada

The Canadian delegation is pleased to be a member of the drafting group charged with the reorganization of Section 5 to reflect the flow of feeds through the manufacturing process after the comments on CL 2002/26-AF have been received from all interested parties.

In addition to the reorganization of this Section, Canada suggests the following minor editorial changes to the provisions of this section:

> ii. Work and equipment areas are free of fertilizers, pesticides and other such materials not intended for use in feed in order to avoid the potential for *manufacturing errors* and cross-contamination;
>
> iv. Water used in feed manufacture meets hygienic standards and is of potable quality for animals. Conduits for water should be *constructed from materials fit for their intended use*;
>
> 31. Waste feed and other material containing hazardous levels of veterinary drugs, undesirable substances and any other hazards are not used as feed, and, are disposed of in an appropriate and, where applicable, statutory manner ~~and not used as feed~~.

New Zealand

Para 30 (iv): It is not clear what is meant by the words "of potable quality for animals'. New Zealand suggests the following alternative text:

> *"Water used in feed manufacture meets similar safety standards to other feed ingredients."*

Norway

The term "processing" should be included in the title, and in the following text in Points 27 and 28.

United States[11]

It is the understanding of the United States delegation that the 18 items in Section 5 will be organized and grouped by appropriate areas.

29. Where appropriate, the operators should follow ~~GAPs~~, GMPs, and/or HACCP principles to control hazards that may occur in food.

30. The effective implementation of ~~GAPs~~, GMPs, and/or HACCP principles should ensure in particular that:

Rationale: We have deleted the GAPs, good agricultural practices, from the above 2 sentences because both sentences refer to the production of feed and thus GMPs or HACCP principles are applicable but GAPs are not. In our view GMPs or HACCP principles apply when making feed, and GAPs apply when producing pastures, cereal grain and forage crops for use as feed.

ii. Work and equipment areas ~~are free of~~ do not contain chemical fertilizers, pesticides, and other such materials not intended for use in feed in order to avoid the potential for cross-contamination.

Rationale: We replace "are free of" with "do not contain" for clarity and because we believe that "do not contain" better describes what is attainable.

iii. Water used in feed manufacture meets hygienic standards and is of potable quality suitable for animals. Conduits for water should be of inert nature;

Rationale: We have added the word "suitable" because potable implies a human standard, and is not necessary for feed manufacture.

vi. Condensation is minimized in the manufacturing and processing facility.

Rationale: We have added "in the manufacturing and processing facility" for clarity.

vii. Sewage, waste and rain water is disposed of in a manner that ~~ensures that~~ minimizes contamination of equipment, feed and feed ingredients. ~~are not contaminated~~.

Rationale: We replaced "ensures that" with "minimizes contamination of" for clarity and because we believe that "minimizes contamination of" better describes what is attainable.

xiv. Feed and feed ingredients should be delivered and used as soon as possible after manufacture. Any feed and feed ingredients should be stored and transported in a manner, which ~~prevents~~ minimizes deterioration and contamination; and ~~ensures~~ enables ~~that~~ the correct feed ~~is~~ to be sent to the right animal group;

Rationale: The actions described in xiv can minimize deterioration but cannot prevent deterioration. The actions can enable the correct feed to be sent to the right animal group but it cannot ensure that the feed is sent to the right group.

xv. Containers and equipment used for transport, storage, conveying, handling and weighing are kept clean. Cleaning programmes should minimize ~~the use, and therefore any remaining~~ residues of detergents and disinfectants;

Rationale: Deleting the phrase "the use and therefore any remaining" clarifies the information.

[11] New additions are underlined; old parts are struck through; only changed sections are included

xvi. Pathogen control procedures, such as heat treatment or the addition of authorized chemicals, are used where appropriate and monitored ~~throughout the manufacturing process~~

Rationale: Delete the phrase "through out the manufacturing process" it is not needed and there is not point in checking the heat treatment beyond the heating process.

European Community

Title: the title should be replaced by the following:

" Production, processing, storage, transport and distribution of feeds and feeds ingredients"

Comment: The title should include also a reference to processing and transport.

Point 27 . Replace this paragraph by the following:

"Responsibility for the production, processing, storage, transport and distribution of safe and suitable feed and feed ingredients lies with all the operators of the feed chain. This responsibility should cover all of those activities which are under the direct control of the operator and includes farmers who should comply with any applicable statutory requirements"

Comment: Processors should be also responsible of the activities they perform. It is necessary to precise that operators are responsible of their activities and not in general.

OIE

29. Where appropriate, the operators should follow ~~GAPs,~~ GMPs and/or HACCP principles to control hazards that may occur in food.

30. The effective implementation of ~~GAPs,~~ GMPs, and/or HACCP principles should ensure in particular that:

xvii. Pathogen control procedures, such as heat treatment or addition of authorised chemicals, are used where appropriate and monitored ~~throughout the manufacturing process~~.

ICFMH/IUMS

Paragraph 29 – 30:

Application of GAP and GMP is a condition for the application of the HACCP principles. If GAP and GMP do not prevail, it serves no purpose to implement HACCP. For this reason, delete the *or* in *and/or*. To turn it around, HACCP can *not* remedy BMP (i.e. Bad Manufacturing Practice)!

SECTION 6 - ON-FARM PRODUCTION AND USE OF FEED (paras. 32-34)

Canada

The Canadian delegation is pleased to be a member of the drafting group that will help to revise this section so that Section 6 focuses on those areas unique to on-farm production and feeding.

Canada suggests minor editorial changes to the current provisions in this section as follows:

Canada recommends modifying the title of this section as follows so that it is clear that feed ingredients are covered by this Section:

Section 6. On-Farm Production and Use of Feeds and Feed Ingredients

References to physical contamination should be removed from this section unless a specific link can be made between consumer health and the contamination of feeds with broken needles, machinery and other foreign material.

New Zealand

While New Zealand welcomes the revision of this section made by the drafting group, we continue to have concerns about the intent and application of the Code to different farming systems. The section is still too prescriptive and with details that do not apply to all farming systems. We continue to believe that it may be more appropriate and pragmatic to focus in this section on the general principles that might be applicable across different farming systems. If detailed provisions relevant to particular farming systems are to be included it may be more appropriate to incorporate them as separate annexes. The task force also needs to have due regard for the practicalities of implementation of this code in different cultures, agricultural systems, and farming environments.

Norway

Norway has highlighted the importance of some adjustment to make the code more applicable to aquaculture. The Task Force has made some general comments on this and other issues in the further work on the reorganisation of Section 5 to possibly also include Section 6. More details on this will be presented in the drafting group led by Canada, where Norway also participates.

United States[12]

The United States appreciates the work the drafting group did on Section 6 at the meeting in June. We also realize that Section 6 as presented in ALINORM 03/38 is to undergo major revision by the drafting group and that Section 5 and 6 will be integrated where possible and that Section 6 will focus on those area unique to on-farm production and feeding. Therefore, we have limited our comments to those paragraphs that define the scope and to areas in which we believe the food safety aspects could be better emphasized.

Section 6. O-Farm Agricultural production and use of feed

Rationale: The addition of the word "Agricultural" helps to better identify the purpose of the section.

34. On-farm manufacturing of feed should follow the same principles as industrial feed production and adherence to good manufacturing practices (GMPs). ~~Where possible, GMPs are encouraged during all stages of on-farm manufacturing of animal feed for food producing animals, to help ensure the safety of animal origin food for human consumption.~~ To help insure the safety of foods used for human consumption, GAP principles should be applied during all stages of on-farm production of pastures, cereal grain and forage crops used as feed and feed ingredients for food producing animals. ~~Three~~ Two types of contamination represent hazards at most stages of on-farm production of feeds, namely;

Biological, such as bacteria, fungi and other microbial pathogens,

Chemical, such as residues of medication, pesticides, fertilizer or other agricultural substances.

~~Physical, such as broken needle, machinery and other foreign material~~.

Rationale: We believe that the proposed deletion and the replacement wording more clearly state the purpose of the section.

European Community

Point 34. In the second line the words "where possible" must be deleted.

12 New additions are underlined; old parts are struck through; only changed sections are included

Comment: GMP should apply at all stages of on-farm production and manufacturing of feed for food-producing animals; there would otherwise be an inconsistency with the first sentence of the paragraph.

OIE

> 34. On-farm manufacturing of feed should follow the same principles as industrial feed production and adhere to god manufacturing practices (GMPs). ~~Where possible, GMPs are encouraged during all stages of on-farm manufacturing of animal feed for food producing animals~~. **To** help ensure that safety of animal of animal origin food for human consumption, **GAP principles should applied during all stages of on-farm production of pastures cereal grains and forage crops used as feed and feed ingredients for food producing animals**. Three types of contamination represent hazards at most stages of on-farm production of feeds, namely:
>
> - biological, such as bacteria, fungi and **any** other ~~microbial pathogens~~ **pathogenic agents**,

ICFMH/IUMS

Dot 4: The same comment as in Section 5, paragraphs 29-30, applies.

Dot 4: It is unclear what is meant by *physical hazards.* Is it too high humidity with possibilities for mould and mycotoxin formation, is it the use of too high temperatures when pelletising or at extraction of fat which may have impact on the nutritional value of the feed, or what?

SECTION 6.1.1 - PRODUCTION OF PASTURES, CEREAL GRAIN AND FORAGE CROPS (para. 35)

IDF

Bedding material: Next to straw as bedding material are also sand, sawdust or mats available with very good hygienic properties. However these materials are not components of animal feed. Therefore a clearer wording will be necessary to ensure that the use of the above mentioned materials are not jeopardised.

SECTION 6.1.1.1 - MANURE FERTILIZER (paras. 36-37)

No comments

SECTION 6.1.1.2 - CHEMICAL FERTILIZER (para. 38)

No comments

SECTION 6.1.1.3 - PESTICIDES (paras. 39-41)

New Zealand

New Zealand suggests the revision of the last sentence of paragraph 39 as follows:

> *"If a regulatory system is in place, then any chemicals used must comply with the requirements of that system."*

This is to recognize the fact that certain categories of chemicals can be managed without registration.

United States[13]

41. Chemicals should be disposed of responsibility in a manner that will not lead to contamination of any water body, soil, feed or feed ingredients which may lead to contamination of foods of animal origin which adversely affect foods used for human consumption.

Rationale: The addition of the phrase "which may lead to contamination of foods of animal origin which adversely affect foods used for human consumption" links the need for responsible disposal to human food safety.

European Community

Point 39. Delete the words: "*who follow HACCP principles in the manufacture of their products"*.

Comment: this requirement is out of the scope of the Code.

6.1.1.4 - SITE SELECTION AND WATER USE (para. 42)

United States[14]

42. Land used for production of livestock feeds should not be located in close proximity to industrial operations where industrial pollutants from air, ~~or~~ ground water or runoff from adjacent land which could ~~would be expected to~~ result in the production of feed and feed ingredients used in the production of food producing animals, which may present a risk to food safety. ~~of foods of animal origin that may present a risk to food safety. Runoff from adjacent land and irrigation water should be free of any contaminants that may present a risk to food safety~~.

Rationale: The rewording of paragraph 42 clarifies the intent of the paragraph and better links the guidance on land use to human food safety.

6.1.2 - WATER (para. 43)

No comments

6.2 - MANUFACTURING OF FEED ON FARM

6.2.1 - FEED INGREDIENTS (paras. 44-45)

No comments

6.2.2 - MIXING (paras. 46-47)

No comments

6.2.3 - STORAGE (paras. 48-51)

Australia

50. Storage areas should be structurally sound, adequately maintained and kept clean, dry and at an appropriate temperature and humidity to minimise microbial growth.

13 New additions are underlined; old parts are struck through; only changed sections are included

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There is another possible logistical problem in regards to the requirement of storage areas being kept dry and at an appropriate temperature and humidity. In the northern Australian atmosphere this may require air-conditioned storage and, as there is no differentiation between storage of grains, bulk materials, finished feeds, feed additives or mediations, it could possibly require the air-conditioned storage of all of these items.

6.2.4 - MONITORING RECORD (paras. 52-53)

No comments

6.3 - GOOD ANIMAL FEEDING PRACTICE (para. 54)

No comments

SECTION 6.3.1 - PASTURE GRAZING (paras. 55-57)

No comments

SECTION 6.3.2 - DISTRIBUTION (para. 58)

Australia

> 58…Non-medicated feeds should be handled separately from medicated feeds to prevent contamination.

This sentence should be reworded to say 'Non-medicated feeds should be handled to prevent cross contamination from medicated feeds'. As it was, 'separately' could have been interpreted as separate delivery trucks that would be an onerous requirement.

SECTION 6.3.3 - FEEDING (paras. 59-61)

New Zealand

Again, the requirement of paragraph 61 is prescriptive and impractical and does not take into account the constraints of different farming systems. New Zealand suggests amending paragraph 61 as follows:

> *"Animals receiving medicated feeds should be individually identified or separately managed until withholding period (if any) has expired."*

SECTION 6.3.4 - STABLE FEEDING AND LOT/INTENSIVE FEEDING UNIT

SECTION 6.3.4.1 - LOCATION (para. 62)

Switzerland

> The animal production unit ..... that pose a risk to food safety *coming from animal feeding*.

Reason: Other risks related to location may influence food safety, e.g. polluted air or infectious diseases.

SECTION 6.3.4.2 - HYGIENE (paras. 63-65)

No comments

SECTION 6.3.5 - WATER (para. 66)

No comments

SECTION 7 - METHODS OF ANALYSIS AND SAMPLING

New Zealand

The text, as it is currently written does not adequately recognize that it may also be appropriate for countries to use methods of analysis and sampling developed at the national level where such methods and sampling protocols are more appropriate and suited to their systems and requirements. New Zealand recommends amending paragraphs 67 and 68 to reflect this situation.

Norway

Norway supports to include reference to Codex principles in the text for development of national control.

European Community

Comment: The Task Force on Animal Feeding should request that the terms of reference of the Codex Committee on Methods of Analysis and Sampling be extended. The Committee's terms of reference do not include the possibility of establishing reference methods of analysis and sampling for feed.

SECTION 7.1 - SAMPLING (para. 67)

Canada

Canada suggests reordering of this section so that the last sentence becomes the first. The revised paragraph would read as follows:

> *It is important to ensure that the sample taken is representative of the consignment or of the lot. National Feed Control authorities should use defined sampling procedures based on Codex sampling plans for the particular commodity/contaminant combination where available. Otherwise relevant official methods of sampling as elaborated by international organisations, such as the International Standards Organisation (ISO) and AOAC International, should be used.*

SECTION 7.2 - ANALYSIS (paras. 68-69)

Canada

Canada suggests rewording the fourth sentence in this Section as follows:

> Where no appropriate international analytical standard exists, methods should be developed using scientifically recognized principles and procedures.

Switzerland

> Analysis should be conducted *in officially accredited laboratories, or laboratories which employ Good Laboratory Practice.*

Reason: We think that at least an official accreditation is needed, but that not both, accreditation and GLP, should be required.

United States[15]

68. Where samples are selected for analysis, validated standard methods elaborated by competent authorities should be used. of analysis or methods validated through appropriate protocols should be used. Official methods of analysis elaborated by international organizations should be used. These include the ISO, European Committee for Standardisation (CEN) and AOAC International. Where no appropriate international analytical standard exists, methods should be developed using scientifically other scientifically recognized rules can principles and procedures be used. The method selected should also be chosen on the basis of practicability, with preference given to those methods that are reliable and applicable to routine use. which are applicable for routine use, and of reliability. Laboratories conducting routine analyses of feed and feed ingredients should ensure their analytical competency with each method used and maintain documentation according to good manufacturing procedures.

~~69. Analysis should be conducted in official or officially accredited laboratories, and which employ Good Laboratory Practice.~~

Rationale: We believe that our proposed changes in the wording of paragraph 68 and the deletion of paragraph 69 state what is the current capability and state of the industry. In support of this we offer the following analysis of the industry.

Good Laboratory Practice (GLP) is not appropriate for feed assays. Good Laboratory Practice requirements were originally only for studies submitted to regulatory authorities to support the safety of a product. Chemical and microbiological assays for quality control were not within the scope of GLP regulations. Many of the assays for feed are still microbiological. These assays are very old and would in many cases not meet today's standard for method validation, system suitability, etc.

To our knowledge, there are no procedures for designating an official laboratory or an accredited laboratory for feed assays. Furthermore, it is not clear how methods required by governmental regulatory agencies would apply.

European Community

Point 68 .The entire paragraph should be replaced by the following:

"Where samples are selected for analysis, standard methods of analysis or methods validated through appropriate protocols should be used. Official methods of analysis based on Codex principles and elaborated by the competent authorities should be used. In the absence of such methods, relevant methods elaborated by international organisations should be used. These include the ISO, CEN and AOAC International. Where no appropriate international analytical standard exists, other scientifically recognised rules can be used. The method selected should also be chosen on the basis of practicability, with preference given to those methods that are applicable for routine use, and of reliability. "

Comment: Many countries have adopted official methods for sampling and analysis based on international principles that should be considered as the first option. This does not rule out the possibility that ISO, CEN or AOAC rules may apply in the absence of official methods. This comment is also coherent with paragraph 67 that recognises that the national control authorities can define sampling procedures based in codex principles.

OIE

69. Analysis should be conducted in official or officially accredited laboratories, and which employ Good Laboratory Practice, **where appropriate**.

15 New additions are underlined; old parts are struck through; only changed sections are included