codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 3 **CX/AF 04/5/4**
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD-HOC INTERGOVERNMENTAL CODEX TASK FORCE ON ANIMAL FEEDING

Fifth Session

Copenhagen, Denmark, 17 - 19 May 2004

CONSIDERATION ON DEFINITION OF "FEED ADDITIVES", PARAGRAPHS 11, 12 AND 13 OF THE DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING

Comments at Step 6

Comments from: Argentina, Australia, Canada, Egypt, Japan, New Zealand, Paraguay, South Africa, Switzerland, Thailand, United States, European Community, EuropaBio, European feed Manufacturers Federation (FEFAC) in response to CL 2003/22-AF

GENERAL COMMENTS

AUSTRALIA

Australia welcomes the opportunity to provide comments for consideration on the definition of "feed additives" and paragraphs 11, 12 and 13 of the draft Code of Practice on Good Animal Feeding (ALINORM 03/38A, Appendix II) as requested in CL 2003/22-AF.

CANADA

Canada is pleased to offer the following comments on the *Proposed Draft Code of Practice on Good Animal Feeding (*definition of "feed additives" and paragraphs 11, 12 and 13*), CL 2003/22-AF*.

EGYPT

Referring to CL 2003/22-AF dated 07-2003 concerning the draft Code of Practice on Good Animal Feeding (ALINORM 03/38A, Appendix II), I would like to inform you that EOS approves the definition of "feed additives" and paragraphs, 11, 12 and 13 of the above mentioned draft.

SOUTH AFRICA

South Africa would like to express its support for the compromise wording as proposed during the 26th Session of the CAC (paragraph 40, ALINORM 03/41) with a few minor amendments as stipulated below.

SWITZERLAND

We thank you for giving us the opportunity to submit our comments on the CL 2003/22 regarding the Draft Code of Practice on Good Animal Feeding at step 6, as follows:

UNITED STATES

The United States welcomes the opportunity to provide comments for consideration on the definition of "feed additives" and paragraphs 11, 12 and 13 of the Draft Code of Practice on Good Animal Feeding as requested in CL 2003/22-AF.

EUROPEAN COMMUNITY

The European Community (EC) welcomes the proposed Draft Code of Practice on Good Animal Feeding and is satisfied with the current drafting.

With a view to get a consensus on the outstanding issues the EC will accept the proposal (with a small drafting change) supported by various delegations at the 26th Session of the Codex Alimentarius Commission. The proposal is hereunder enclosed.

The EC regrets that issues relating to traceability and record keeping that achieved a large measure of consensus during the discussions in the Task Force were raised at the very last moment in the 26th Session of Codex Alimentarius Commission.

The EC considers it is important that the principles of traceability and record keeping are included in the Code while details for implementation are developed by the Member Countries. Traceability and record keeping are used for various important purposes along the food and feed chain. In the context of this Draft Code, the EC believes that traceability and record keeping is a fundamental tool to ensure food safety.

EUROPABIO

In response to the request for comments on the "Draft Code of Practice on Animal Feeding" (CL 2003/22-AF) and following EuropaBio comments from 28th May 2003, EuropaBio has further considered what could be an appropriate text.

EuropaBio supports the compromise text proposed by the Unites States (CAC/26 LIM.16) from paragraph 11 to 13 of the Code of Practices on Animal Feeding (ALINORM 03/38A Appendix II).

SPECIFIC COMMENTS

SECTION 3 – DEFINITIONS – DEFINITION OF "FEED ADDITIVES"

ARGENTINA

The Working Group on Animal nutrition proposed the following definition of Additive for feeds: Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has a nutritional value, which affects the characteristics of feed or animal products.

In Argentina's opinion, the definition to be adopted is that of additives as appears in the Manual of Procedures of the Codex (12th edition, page 47), with the specific amendments needed to bring it in line with feeds intended for animal consumption.

In light of the terms of the definition, the text should read as follows:

Feed Additive: any substance not normally consumed as a food by itself and not normally used as a typical ingredient of the food, whether or not it has nutritive value, **added without a specific nutritional aim** the intentional addition of which to food for a technological (including organoleptic) purpose in the manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food results, or may be reasonably expected to result, (directly or indirectly) in it or its by-products becoming a component of or otherwise affecting the characteristics of such foods. This definition does not include "contaminants" or substances added to the feed to maintain or improve its nutritional qualities.

AUSTRALIA

For the definition of **feed additive** the wording proposed is: *'any intentionally added ingredient not normally consumed as feed by itself, whether or not it has nutritional value, which affects the characteristics of feed, or animal products (1)'. (1) microorganisms, enzymes, acidity regulators, trace elements, vitamins, and similar products fall within the scope of this definition depending on the purpose of use and way of administration.*

Australia understands that the above wording is based on a compromise position agreed between the US and EU prior to the Codex Commission meeting in July this year. As such, Australia supports this compromise and believes it offers a constructive solution to this outstanding matter in order to facilitate adoption of the draft Code by the Commission.

CANADA

Canada recognizes the concerns raised by member countries regarding the current definition for **"feed additives"** in the proposed Code. Canada is pleased to support the addition of a footnote providing clarification as to the types of feeds covered by the term "feed additive." The revised definition would read as follows:

> ***Feed additive*** *(1): Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has nutritional value, which affects the characteristics of the feed or animal products.*
>
> *(1) Microorganisms, enzymes, acidity regulators, trace elements, vitamins and similar products fall within the scope of this definition depending on the purpose of use and the mode of administration.*

JAPAN

Japan proposes to replace the current definition of **feed additives** in the Draft Code with the following:

> ***Feed Additive***: Any intentionally added ingredient **in feed for healthy animals** not normally consumed as feed by itself, whether or not it has **direct or indirect** nutritional value, which affects the characteristics of feed, animal products **or animal production;**

Rationale:

1. The current definition as accepted in the Draft Code of Practice does not cover the use of substances to improve the animal performance (*e.g.*, vitamins, trace elements, microorganisms, etc.), which are classified as feed additives in many countries.
2. In the 26th Session of the Codex Alimentarius Commission, the delegation of the USA proposed an amendment of the definition of feed additives by adding the following footnote leaving the text unchanged.

   Microorganisms, enzymes, acidity regulators, trace elements, vitamins and similar products fall within the scope of this definition depending on the purpose of use and way of administration.

   This proposal, while some other countries supported, implicates a few problems as follows:

   1) It shows only a few examples of feed additives and is not a comprehensive list. It does not clarify the general criteria of classification into feed additives; and

2) "The purpose of use and the way of administration" which determines the classification of certain substance as in feed additives is not shown.

3. It should be noted that there are different regulatory systems all over the world for the classification of feed ingredients, feed additives and veterinary drugs. The definition in the Code of Practice should be applicable to all of these systems.

4. In order to address the issue above, we wish to propose the text above that provides sufficient clarity and applicability.

PARAGUAY

In the wording of the concept of **feed additive** we suggest a change of form, so that the wording in Spanish is clearer and more legible, as follows:

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

SOUTH AFRICA

South Africa is of the opinion that the definition of **feed additives** is not complete and would prefer the inclusion of reference to "animal performance". The rationale being that certain additives (e.g., enzymes, prebiotics, probiotics, organic acids, etc.) will / may enhance animal performance.

The wording proposed is as follows:

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

SWITZERLAND

As it seems to be excluded to achieve consensus on formulations like … *animal performance* … or … *positive environmental impacts* … Switzerland supports the introduction of a footnote, as proposed by EC:

Feed additive [(1)]: Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has nutritional value, which affects the characteristics of feed or animal products.

[(1)] Micro organisms, enzymes, acidity regulators, trace elements, vitamins, and similar products fall within the scope of this definition depending on the purpose of use and method of administration.

THAILAND

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

Comment: We support this definition.

UNITED STATES

The United States supports the addition of a footnote providing clarification as to the types of additives covered by the term "feed additive."

Feed Additive: *Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has nutritional value, which affects the characteristics of feed, or animal products (1)*

1) Microorganisms, enzymes, acidity regulators, trace elements, vitamins, and similar products fall within the scope of this definition depending on the purpose of use and method of administration.

EUROPEAN COMMUNITY

Include a footnote in the definition of **feed additive** as follows:

> Feed additive [(1)]: Any intentionally added ingredient not normally consumed as feed by itself, whether or not it has nutritional value, which affects the characteristics of feed, or animal products.
>
> [(1)] Microorganisms, enzymes, acidity regulators, trace elements, vitamins, and similar products fall within the scope of this definition depending on the purpose of use and method of administration.

FEFAC

Definition of **feed additives**: we think that the proposed definition laid down in ALINORM 03/38A, Appendix II is acceptable, with reference made to a footnote clarifying the scope of the feed additives definition, which would read: "(*): Microorganisms, enzymes, acidity regulators, trace elements vitamins and similar products fall within the scope of this definition depending on the purpose of use and way of administration. "

SECTION 4 – GENERAL PRINCIPLES AND REQUIREMENTS (PARA. 11)

ARGENTINA

As to the wording proposed by the Working Group for **paragraph. 11** that states: "Competent authorities may decide that feed and feed ingredients consisting, containing or produced from GMOs should be labelled with references to the genetic modification as a risk management measure.", Argentina wishes to make the following comments:

- To date, the Codex Alimentarius Food Labelling Committee has not been able to define whether foodstuffs for human consumption will be labelled according to the method of production, indeed there are very conflicting positions on whether there is a scientific justification to validate this discrimination. In light of the above, we consider that it would be premature for this document to state an opinion on the subject.
- Secondly, the intention here is to establish provisions in an ambit which is not the competence of the Codex, since the Codex should deal with matters affecting food safety and provide information to the consumer on the product on the shelf. There is no scientific evidence that would lead one to believe that a feedstuff or ingredient consisting of, containing or produced using genetically modified organisms and part of the diet of an animal for human consumption, leads to changes in the product or by-product of animal origin for human consumption.

In light of the above, Argentina does not agree with this paragraph and suggests it be deleted.

AUSTRALIA

Australia proposes that **paragraph 11** be deleted with a note added in subsection 4.2 *'this sub-section does not apply to issues related to GM labelling (1). (1) whether and how to label animal feeds consisting of, containing or produced from GMO's awaits developments on food labelling being considered by the Codex Committee on Food Labelling.*

Australia understands that the above wording is based on a compromise position agreed between the US and EU prior to the Codex Commission meeting in July this year. As such, Australia supports this compromise and believes it offers a constructive solution to this outstanding matter in order to facilitate adoption of the draft Code by the Commission.

CANADA

Canada supports the deletion of **paragraph 11** from the draft Code and inclusion of the following text at the end of Section 4.3:

This sub-section does not apply to issues related to labelling of GM feeds, i.e., those feeds consisting of, containing or produced from Genetically Modified Organisms[(1)].

[(1)] Whether and how to label GM feeds awaits developments on food labelling, being considered by the Codex Committee on Food Labelling."

NEW ZEALAND

New Zealand made comments to the Codex Alimentarius Commission regarding **paragraph 11** of the draft Code of Practice in response to CL 2003/14-AF. We would like to resubmit our position as set out in our previous comments, as follows.

The labelling provision in paragraph 11 does not clearly spell out the purpose for labelling and could lead to widely divergent application of labelling provisions. While the current draft contains reference to "risk management measures", it does not link risk management to a risk assessment from a food safety/health protection perspective. The approach being taken in this paragraph is, therefore, inconsistent with the approach being adopted in other areas of Codex and should be modified accordingly.

PARAGUAY

In relation to paragraph 11 ***"Competent authorities may decide that feed and feed ingredients consisting, containing or produced from GMOs should be labelled with references to the genetic modification as a risk management measure."***, we suggest **DELETING THIS PARAGRAPH**, since it is inconsistent with the principal of the Codex that states that the work of the CODEX must be based upon scientific principles, for the reason that labelling, as a part of risk management should always be based upon a strict risk assessment, and carried out on the basis of solid scientific evidence; indicating the presence of GMO's or their derivatives on the label is not a question of safety, and is not consistent with the aim of the Code. It is also worth pointing out that the Labelling "in general" of Foods and food ingredients obtained through certain techniques of genetic modification/genetic engineering", is being dealt with by the Codex Committee on Food Labelling (CCFL), and to date no significant progress has been made, nor has any agreements been made on this matter.

SOUTH AFRICA

South Africa is of the opinion that the labelling of products containing GMOs in this Code is premature and should await the outcome of discussions at the Codex Committee on Food Labelling (CCFL). It is thus proposed that **paragraph 11 be deleted** and be replaced with a sentence that reads:

"This subsection does not apply to issues related to GM labelling[1]"

The footnote should read as follows:

"Whether and how to label animal feeds consisting of or produced from GMOs awaits developments on food labelling, being considered by the CCFL"

SWITZERLAND

We propose to maintain **paragraph 11** unchanged, but to add a footnote, in the sense that … *further development concerning GMO labelling on food emerging from CCFL should be considered* …

UNITED STATES

The United States proposes to delete **paragraph 11** with a note added to subsection 4.2

This subsection does not apply to issues related to GM labelling (1)

1) *Whether and how to label animal feeds consisting of, containing, or produced from GMOs await developments on food labelling being considered by the Codex Committee on Food Labelling*

EUROPEAN COMMUNITY

Delete the **paragraph 11** and include the following in subsection 4.2:

"*This sub-section does not apply to issues related to GM labelling (1).*

(1) Whether and how to label animal feeds consisting of, containing or produced from GMOs, awaits developments on food labelling being considered by the Codex Committee on Food Labelling. "

EUROPABIO

4.2 LABELLING

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

- *• information about the species or category of animals for which the feed is intended;*
- *• the purpose for which the feed is intended;*
- *• a list of feed ingredients, including appropriate reference to additives, in descending order of proportion;*
- *• contact information of manufacturer or registrant;*
- *• registration number if available;*
- *• directions and precautions for use;*
- *• lot identification;*
- *• manufacturing date; and*
- *• use before or expiry date.*

This sub-section does not apply to issues related to GM labelling (1)

(1): whether and how to label animal feed consisting of or produced from GMOs awaits developments on food labelling, being considered by the Codex Committee on food Labelling

EuropaBio also believes that any future policy to be developed for the labelling of foodstuff by CCFL is not automatically relevant for feedstuff.

FEFAC

Para 11: we hold the view that it may be premature to adopt definitive provisions with regards to GM feed labelling before the Codex Committee on Food labelling has not come up yet with definitive conclusions. We would therefore recommend the following alternative:

- Delete para.11;
- Insert in subsection 4.3 the following sentence: "This sub-section does not apply to issues related to GM labelling" with reference to a footnote;
- Insert a footnote, which would read: "Whether and how to label animal feeds consisting of, containing or produced from GMOs awaits developments on food labelling being considered by the Codex Committee on Food Labelling."

SECTION 4 – GENERAL PRINCIPLES AND REQUIREMENTS (PARA. 12 AND 13)

ARGENTINA

With respect to the wording proposed by the Working Group for **paragraph. 12**, which states: "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. 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 safety problem emerge, and representative samples of feed and feed ingredients should be kept where applicable for a suitable period of time." In respect of this, Argentina wishes to make the following remarks:

1. Traceability / product tracing has been discussed recently at the CCFICS and the Members agreed not to pursue any new work before the Committee on General Principles defines what is meant by traceability / product tracing and its scope of application. In light of that, such a procedure should not be defined in this document until this question of substance has been defined.
2. Secondly, we reiterate the comments made on the labelling of feeds, underlining once again that it is important to bear in mind the situation of countries with extensive livestock rearing practices mainly involving pasture, in which there can be seasonal variations in the availability of forage crops, which means that producers are obliged to supplement animal diets. In these cases gross purchases of raw materials and ingredients are made in bulk or are part of the production of the holding, which is why information on such raw materials could be documented but not necessarily through labelling.
3. Finally, Argentina considers that this paragraph is to be resolved as a prior step to resolving the issues mentioned above, paragraph 12 should be worded as follows:

Paragraph 12: "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 recall or restrict their use should a safety problem emerge, and representative samples of feed and feed ingredients should be kept where applicable for a suitable period of time.."[1]

[1] In preferentially pasture-based systems, industrialised feed plants for animals for human consumption should maintain, documentary information for identifying trace-back or trace-forward in the process of feed use.

With regard to **paragraph 13.** we feel it should be deleted, since the information required in that paragraph has been broken down in other parts of the document.

AUSTRALIA

Australia proposes that **paragraphs 12 and 13** on traceability and record keeping be replaced by one paragraph along the following lines: *'Traceability/product tracing of feed and feed ingredients, including additives, should be enabled by product identification and appropriate record keeping which will facilitate timely and efficient withdrawal or recall of products when consumer health risks are identified. Records should be maintained and readily available regarding the production, distribution and use of feed and feed ingredients that will facilitate the prompt trace-back of feed and feed ingredients to the immediate previous source and trace-forward to direct recipients of the products.(1)' (1) detailed measures on traceability/product tracing and record keeping shall be developed pending the discussion at the Codex Committee on Certification and Inspection Systems and the Codex Committee on General Principles.*

CANADA

Canada recognizes the concerns expressed by several member countries regarding the prescriptive nature of **Paragraphs 12 and 13**. Accordingly, Canada supports the replacement of paragraphs 12 and 13 of the draft Code with the following text:

Traceability/product tracing of feed and feed ingredients, including additives, should be enabled by product identification and appropriate record keeping which will facilitate timely and efficient withdrawal or recall of products when consumer health risks are identified. Records should be maintained and readily available regarding the production, distribution and use of feed and feed ingredients that will facilitate the prompt trace-back of feed and feed ingredients to the immediate previous source and trace-forward to direct recipients of the products.

PARAGUAY

Likewise, we feel it is appropriate to **DELETE** paragraphs 12 and 13. First of all we should point out the difficulty facing developing countries in implementing the practices established in both paragraphs, as they are extremely restrictive and difficult to apply and furthermore they are not related to the aim of the Code of Practice. Secondly, when speaking of the traceability/product tracing of feed, it refers to terms that are not even defined in the scope of the CODEX, thus it is totally inappropriate to include such terminology, a possible definition for which is being studied and analysed by the Codex Committee on General Principles (CCGP). Nor has it been agreed in the CCFICS to begin any new work on Traceability, until the definition by the CCGP has been clarified.

SOUTH AFRICA

South Africa is of the opinion that extensive detailed requirements for traceability/product tracing is premature as this is still under discussion in the CCGP and CCFICS. Thus it is proposed that in order to still meet the intent of this section, that the more general requirements be retained (paragraph 12), but that the detailed requirements in paragraph 13 be deleted. It is further proposed that in order to keep further developments on traceability open in this document pending the outcome of discussions at CCGP and CCFICS that a sentence to this effect be added as a footnote to paragraph 12 or as a new paragraph 13.

It is proposed that paragraph12 / 13 should read as follows:

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. 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 is appropriate to enable trace-back, should a safety problem* ***emerge and representative samples of food and feed ingredients should be kept where applicable for a suitable period of time.***

13. *Measures on traceability/product tracing and record keeping may be developed pending discussions at the CCGP and CCFICS.*

SWITZERLAND

Both paragraphs could be replaced by the following text, as proposed by EC:

12. Traceability/product tracing of feed and feed ingredients, including additives, should be enabled by proper record keeping at all stages of production and distribution. 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 is appropriate to enable trace-back, should a safety problem emerge [(1)].

[(1)] Measures on traceability/product tracing and record keeping may be developed pending the discussions at the CCFICS and CCGP.

THAILAND

Para 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. 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 product where necessary. Record 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 safety problem emerge, and representative samples of feed and feed ingredients should be kept where applicable for a suitable period of time.*

Comment: Delete the third sentence **"***~~Record should be maintained~~ ….~~for a suitable period of time .~~*" to avoid duplication with the first sentence.

Para 13 *Feed manufacturers should keep records containing full details of the supplier and date of receipt of feed ingredients, of the manufacturing process and the destination of all feed. These records could include:*

- *inventory records(including labels and invoices on received goods), actual formulae, mixing sheets, daily production logs, riles of complaints, files 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 and feed ingredients, records of the disposition of flushed or recovered material, records of mixer validation and scale/metering device verification, etc.*

Comment : The detail statement in the bullet point under Para 13 "These records could include……. and scale/metering device verification, etc." should dominate due to detail of records required or clearly stated in the first sentence then there is no need of examples explaining in this bullet point as "full details of the supplier and date of receipt.

UNITED STATES

Similar to the issue of GMO labelling, development on traceability/product tracing is under active discussion in two Committees, the Codex Committee on General Principles (CCGP) and the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS). The United States proposes to replace **paragraphs 12 and 13** with the following:

12. Traceability/product tracing of feed and feed ingredients, including additives, should be enabled by proper recordkeeping for timely and efficient withdrawal or recall of products if consumer health risks are identified. Records should be maintained and readily available regarding the production, distribution and use of feed and feed ingredients to facilitate the prompt trace-back of materials and products to the immediate previous source and trace-forward to the next subsequent recipients if consumer health risks are identified.

[1] Development of detailed measures on traceability/product tracing should await the conclusion of discussions on traceability/product tracing in CCFICS and CCGP.

EUROPEAN COMMUNITY

Replace **paragraph 12 and 13** by the following:

12. Traceability/product tracing of feed and feed ingredients, including additives, should be enabled by proper record keeping at all stages of production and distribution. 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 is appropriate to enable trace-back, should a safety problem emerge (1).

(1) Measures on traceability/product tracing and record keeping may be developed pending the discussions at the CCFICS and CCGP.

EUROPABIO

12. Traceability/product tracing of feed and feed ingredients, including additives, should be enabled by proper record keeping at all stages of production and distribution. 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 safety problem emerge (1).

(1): measures on traceability/product tracing and record keeping may be developed pending discussions at the CCFICS and CCGP.

FEFAC

Para. 12: we can accept the deletion of the last sentence of para.12 and the deletion of **para. 13**, although we consider that sampling is an important risk management tool for operators of the feed chain. Hence, we would like to stress the necessity to come back to this question in the next future, and in particular once detailed measures on traceability/product tracing and record keeping have been developed by the CCFICS and the CCGP.