codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 5 (a) **CX/AF 02/6**
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

***AD HOC* INTERGOVERNMENTAL CODEX TASK FORCE ON ANIMAL FEEDING**

Third Session
Copenhagen, Denmark, 17 - 20 June 2002

PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING (with the exception of Section 6 "On-farm Production and Use of Feedingstuffs")

COMMENTS FROM GOVERNMENTS AND INTERESTED ORGANISATIONS AT STEP 3 (in response to CL 2001/36-AF)

The present document contains the revised text of the Proposed Draft Code of Practice on Good Animal Feeding with summarised comments submitted by governments and interested international organisations at step 3 in response to CL 2001/36-AF requesting proposals for additions or amendments to the Proposed Draft Code of Practice on Good Animal Feeding. The text of the Proposed Draft Code of Practice on Good Animal Feeding (excluding section 6 "On Farm Production and Use of Feedingstuffs") and the comments are submitted to the Task Force **for consideration at step 4** of the *Codex Uniform Procedure for the Elaboration of Codex Standards and Related Texts* (see Procedural Manual of the Codex Alimentarius Commission, 12th Edition, pages 21-23)

Comments from:

Australia; Argentina; Brazil; Canada; Egypt; Hungary; Malaysia; Moldavia; New Zealand; Norway; Poland; Senegal; Switzerland; Turkey; USA; European Community; CEFS (Comité Européen des Fabricants de Sucre)**; FEFAC** (Fédération Européenne des Fabricants D'aliments Composes); **IDF** (International Dairy Federation); **ICFMH/IUMS** (International Committee on Food Microbiology and Hygiene/International Union of Microbiological Societies); **OIE** (Office International des épizooties).

COMMENTS FROM GOVERNMENTS AND INTERESTED ORGANISATIONS ON THE REVISED PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING[1] (excluding section 6)

GENERAL COMMENTS

- **Australia** supports the general principles of the draft code as it is currently written for the manufacture, handling and storage of feeds for farm animals because it sets a framework for good practice and allows the variability of country specific regulations.

  Labelling:
  The current draft however is prescriptive in relation to labelling requirements. Australia believes good labelling practice guidelines should be provided, rather than describing precisely what should appear on the label.

- **Canada:** Canada is pleased to offer the following comments on the Proposed Draft Code of Practice on Good Animal Feeding (with the Exception of Section 6), CL 2001/36-AF.

- **Malaysia:** in general agrees on the Proposed Draft Code of Practice on Good Animal Feeding (including Section 6 of the Code) with some comments as follows.

- **Republic of Moldova:** agrees with the proposed Draft Code of Practice on Good Animal Feeding (at step 3 of the procedure) and has no comments to it.

- **New Zealand:** New Zealand congratulates the drafting group on the excellent task of revising the draft Code of Practice for Good Animal Feeding (with exception of Section 6). We submit the following suggestions to further strengthen and clarify the document.

- **Norway:** Welcomes the proposed draft and would like to express gratitude to all those who have contributed to the present proposal. This code will represent an important measure in the efforts made to secure consumers safety. Norway is generally satisfied with the text. There are, however, some areas of concern which we feel should be addressed in the document.

  - authorisation and labelling of genetically modified organisms (GMO);
  - establishment of a negative list of feed ingredients;
  - requirements regarding labelling and traceability.

  There is an urgent need to adjust the text in relation to aquaculture.

- **Poland:**

  - Having regard to safety of foodstuffs, HACCP and other alternate testing relating to feedingstuffs should be stronger underlined. HACCP intended for small farms should be also taken into account. These procedures would minimize or eliminate undesirable substances in feedingstuffs.
  - It is important to bring into practice a definition of slaughterhouse offal with the statement of risk level – special risk and high risk – in aspect of application in feedingstuffs.
  - It is important to assign a place for probiotics in feedingstuffs.
  - International validated list of analysis and sampling methods of feedingstuffs should be implemented.

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1 *How to read this document:*

The text of the Code is placed in boxes

- **Country / Organisation:**

Comments immediately follow the previous text.

- **Turkey** mentions that the proposed Draft Code of Practice on Good Animal Feeding (CL 2201/36-AF) is overall understandable and practical.

- **United States:** appreciates the opportunity to comment on CL 2000/36 AF, dated October 2001, Request for Comments on the Revised Proposed Draft Code of Practice on Good Animal Feeding (with the exception of Section 6).

- **European Community:** The European Community would like to thank the drafting group led by the United Kingdom for the progress made in preparing this document (CL 2001/36-AF). The European Community is generally satisfied with the proposed text, but there are some particular areas of concern which it feels need to be addressed in the document, namely:

  - authorisation and labelling of genetically modified organisms (GMOs);
  - establishment of a negative list of feed ingredients that must be banned in animal nutrition;
  - status of veterinary medicines in this Code;
  - implementation of GMP and HACCP at processing and farm level;
  - requirements regarding labelling and traceability.

- **CEFS:** (Comité Européen des Fabricants de Sucre), on the behalf of all sugar EU manufacturers plus Switzerland and Hungary, would like to present comments on the proposed draft Code of Practice on Good Animal Feeding. The sugar industry is producing feed materials. It is for this reason that we submit the following comments to you.

- **FEFAC:** The European compound feed manufacturers, as represented by FEFAC, would like to congratulate the draftsmen attempting to complete the draft Codex code of practice on good animal feeding for their constructive contribution in the present consultation documents.

  We feel that the working papers are comprehensive, well balanced and structured could greatly facilitate the discussion at the forthcoming Task Force meeting in Copenhagen in June 2002 allowing the proposals to move forward in the stepwise procedure of CODEX Alimentarius.

- **IDF:** wishes to thank the drafting group for the constructive work in revising the first draft Code (with the exception of Section 6) on the bases of the numerous comments and of the discussions in the Ad Hoc Intergovernmental Codex Task Force.

  The working papers are well structured and shall be a good basis for the discussion in the forthcoming Task Force meeting.

  General comments:

  Reference to national standards and regulations should be avoided.

  We recommend that the dialogue along the feed/food chain be extended within the Code in order to reduce the need to refer to national standards and regulation.

  The unusual number of references to national jurisdiction may be a hindrance to the international acceptance of the Code as it is not clear what level of safety is provided. Examples of such references include, e.g.

  - that “feed ingredients should meet defined standards” – the Code does not provide such standards (section 4.1).
  - that ”all feed and feed ingredients should meet minimum safety standards” – the Code does not provide such standards (Section 4.5)
  - that “veterinary medicines and feed additives should be pre-approved by national or international authorities” – reference should only be made to MLs and MRLs established by Codex (section 5.4.1)

  Food safety involves knowledge of intended use, real use, routes of contaminating food, transfer rates from feed to food, etc. In this respect, a comprehensive reliance on nationally established requirements

may not always assure the feed/food safety as national conditions may not be representative for the international situation.

Control of feed production is an integrated part of the control of animal food production.

The procurement and manufacture of animal feeds are very important links in the animal production chain: the conditions in this branch of trade directly influence the quality and safety of foods of animal origin, including dairy products. The animal feed sector and the preceding links of raw materials suppliers and transporters can therefore be considered as an integral part of the food industry. In this respect the principle, emphasized in the second paragraph of the introduction to Section 4, is essential: it is important that the players along the food chain collaborate with the aim to identify potential hazards and their control throughout the food chain.

The following principles should prevail:

"If levels are not controllable at a later stage in the food chain, the control has to take place in the manufacture and distribution of feed/feed ingredients."

Food safety is the result of the continuum of control measures applied throughout the food chain. Risk management activities, if they have to be effective, needs to be carried out by addressing the whole continuum and not by addressing individual parts of the food chain in isolation. It should be taken into account that the food manufacturer, as being the last link in the food chain, has the responsibility for the food safety (both stated in most food regulations as well as in product liability laws). Consequently, the responsibility for the efficiency of the continuum from feed production, in principle, also lies with the food manufacturer. Problems occur, if there are gaps in the continuum. As feed and food regulations have been typically developed following separate paths and procedures, such gaps do exist. Such gaps should be avoided, also in this Code.

Application of HACCP-based approach in the feed chain is indispensable

Food safety affairs with animal products in the last years have demonstrated that a proactive approach is necessary to control the hazards that may occur in the production of feeds and feed ingredients. The application of legal standards and GMP-guidelines or codes alone is not enough to prevent environmental and process contamination. Systematic hazard assessments of the actual process and the establishment of specific control measures and corrective actions to prevent unforeseen contamination sources, is necessary. This is especially important for the production and distribution of by products of the agro-food industry, which are used in feeds, the manufacturing of feeds on the farm and the feeding itself. All these activities should be submitted to a thorough hazard assessment.

In our opinion the HACCP system is an excellent tool to establish control systems that focus on prevention, as it is a well-structured systematic procedure, which is guided by scientific evidence.

The draft Code of practice on good animal feeding (Section 1, Introduction makes reference to the Codex Alimentarius Recommended International Code of Practice - General Principles of Food Hygiene (GPFH). The current version of the GPFH (CAC/RCP 1-1969, Rev. 3 (1997), Amended 1999) states that: … "… *The document provides a base-line structure for other, more specific, codes applicable to particular sectors. Such specific codes and guidelines should be read in conjunction with the GPFH and Hazard Analysis and Critical Control Point (HACCP) Systems and Guidelines for its Application*".

In the GPFH the principles of the HACCP-system are described and guidelines for the application of these principles. The guidelines should be applied by the business itself and are developed for medium and large-scale industries. Therefore these guidelines may readily be applied by the industries dealing with the collection, processing, transportation and distribution of feeds and feed ingredients.

The guidelines are not suitable for small-scale businesses like farming and on-farm manufacturing of feed. Yet, the GPFH states that a HACCP-based approach may also assist in taking measures to minimize the probability of contaminants in primary production activities (GPFH, par. 3.2). The IDF supports this view, with the understanding that the HACCP-stepwise approach could be used to develop codes of good practice for the primary production of feed ingredients and for the manufacturing of feeds on the farm. In this case the HACCP-principles should be the basis for the application of the HACCP-system, and not the guidelines.

TITLE: PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING

- **IDF:** The title refers to the feeding only. In order to cover the content of the Code as a whole, we recommend the title be amended into *"Code of Practice on Good Animal Feed and Feeding"*.

SECTION 1. INTRODUCTION

This code is to establish a feed safety system for food producing animals which covers the whole food chain, taking into account relevant aspects of animal health and the environment in order to minimize risks to the health of consumers. This code applies in addition to the principles of food hygiene already established by the Codex Alimentarius Commission[2], taking into account the special aspects of animal feeding.

- **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. In addition, the introductory statement should describe what the code does; not what it is intended to do. Accordingly, 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."

- **Egypt (EOS):** It is much better to add "*feed quality and safety system"* (line 1) instead of "*this code is to establish a feed safety system"* because the practice of good animal feeding include both quality and safety.

  Such addition is not required to be repeated in section 1 and/or section 2 because the input of both quality and safety GMP's will ensure the safety of food for human consumption (line 6, section 2. "Purpose and Scope".)

- **Norway:** The code should be extended to also include animal welfare.

- **European Community:** The following should be inserted in the second line after the words *"animal health"*: *", animal welfare"*.

SECTION 2. PURPOSE AND SCOPE

This Code of Practice applies to the production and use of all materials destined for animal feed at all levels whether produced industrially or on farm. It also includes grazing or free-range feeding, forage crop production and aquaculture. The objectives of the Code are to encourage adherence to Good Animal Feeding Practice at the farm level and Good Manufacturing Practice (GMP) during the procurement, handling, storage, processing, and distribution of animal feedingstuffs for food producing animals in order to help ensure the safety of food for human consumption. Those issues of animal welfare other than food safety related animal health are not covered. Environmental contaminants should be considered where the level of such substances in the feed could present a risk to consumer health from the consumption of foods of animal origin.

- **Australia** proposes that while "On farm production and use of feedingstuffs" is addressed in a separate paper, a new sentence should be inserted after the first sentence that says *"Where there are differences between industrial and on farm practices separate sections have been included"*. The additional sentence makes it clear that unless there are separate sections all provisions relate to both industrial and on farm production practices.

[2] Codex Recommended International Code of Practice – General Principles of Food Hygiene (CAC/RCP 1 – 1969, Rev. 3 (1997).

- **Hungary:** The practice of good animal feeding is covering the quality issues, beside the safety issues. We are accepting food production from the animal so we should feed them only with good quality and healthy feedingstuffs.

  The quality and safety is inseparable in the practice of good animal feeding. Whereas the practice on good animal feeding is generally covers the whole animal feeding field, therefore beyond the material-, technological conditions the personal conditions are very important because only with harmonised different professions can achieve the goal.

  New Zealand: New Zealand believes that the format of this section will help to structure the Code. We suggest, however, that the object of the Code, as noted in the third sentence, should be the opening paragraph of this section for clarity of purpose reasons. The objective as currently drafted discusses the means of achieving a food safety outcome and is not explicit as to purpose nor clear on the chain between animal feed and human food safety. We suggest the following:

  *"The **object** of th**is** Code **of Practice is to help ensure the safety of food of animal origin for human consumption by managing feed-borne risks through** encourag**ing** good animal feeding practice at the farm level and good manufacturing practice during **the production**, storage, and distribution of animal feedingstuffs for food producing animals."*

  The unchanged first two sentences of the original paragraph 1 could then form a new second paragraph in this section. These sentences currently read:

  "This Code of Practice applies to the production and use of all materials destined for animal feed at all levels whether produced industrially or on farm. It also includes grazing or free-range feeding, forage crop production and aquaculture."

  The last two sentences of the original paragraph 1 beginning *"Those issues ..."* should form a third paragraph in this section. We have suggested the addition of the word *"only"* in relation to environmental contaminants as this limits consideration of such contaminants to those that have a demonstrable link between the environment AND animal feeds AND human food safety. The paragraph would then read:

  *"Those issues of animal welfare other than food safety related animal health are not covered. Environmental contaminants should **only** be considered where the level of such substances in the feed could present a risk to consumer health from the consumption of foods of animal origin."*

- **Norway:** Norway strongly supports that the code on good animal feeding should include aquaculture, as this constitutes an integrated part of an important food production chain.

  A specific "Code of practice for fish and fishery products" is under preparation in the Codex Committee for Fish and Fishery products (CCFFP). This code intends to cover industrialised and commercial aquaculture production of fish and crustaceans for international trade, but will not cover extensive fish farming systems or integrated livestock and fish culture systems. Food safety in the less intensive and local production needs therefore to be covered by the "on farm code".

  Both codes should take into account possible impact on animal health, animal welfare, and the environment in the addition to the main objective of food safety.

- **Switzerland:** Question for clarification: Are beekeeping and honey production covered by this text?

- **United States:** Proposes the first paragraph to read as follows:

  *"This Code of Practice applies to the production and use of all materials destined for animal feed at all levels whether produced industrially or on farm. It also includes grazing or free-range feeding, forage crop production and aquaculture. The objectives of the Code are to encourage adherence to Good Animal Feeding Practice at the farm level and Good Manufacturing Practice (GMP) during the procurement, handling, storage, processing, and distribution of animal feed~~ingstuffs~~ for food producing animals in order to help ~~ensure~~ **maximize** the safety of food for human consumption. Those issues of animal welfare other than food safety related animal health are not covered. Environmental contaminants should be considered where the level of such substances in the feed could present a risk to consumer health from the consumption of foods of animal origin."*

Rationale**:** Strike "ingstuffs" to keep consistent with definitions in third sentence. Strike the word "ensure" and replace with "maximize" in the first paragraph. Ensure guarantees certainty, which is difficult in this case.

- **IDF:** As section 6, "On farm production and use of feedingstuff" is added, it should be made clear that, unless there are separate sections, all provisions relate to both industrial and on farm production practices. Therefore we propose to add the following new sentence after the first sentence:

  "Where there are differences between industrial and on farm practices separate sections have been included".

- **OIE:** Suggest to divide the first paragraph into three paragraphs for better clarity, selecting third sentence as lead paragraph:

  "The objectives of the Code ***is to contribute to ensuring the safety of animal feed destined for food producing animals by encouraging*** *adherence to Good Animal Feeding Practice at the farm level and Good Manufacturing Practice (GMP) during the procurement, handling, storage, processing, and distribution of animal feedstuffs.*

  This Code of Practice applies to the production and use of all materials destined for animal feed at all levels whether produced industrially or on farm. It also includes grazing or free-range feeding, forage crop production and aquaculture.

  Those issues of animal welfare other than food safety related animal health are not covered. Environmental contaminants should ***only*** *be considered where the level of such substances in the feed could present a risk to consumer health from the consumption of foods of animal origin."*

While recognizing that, in its totality, a feed safety system would address animal health and environmental issues, in addition to consumer health, this Code of Practice, in fulfilling the Codex mandate of consumer protection, only addresses food safety. Notwithstanding this, best efforts have been made to ensure that the recommendations and practices in this Code of Practice will not be detrimental to the more general animal health and environmental aspects of animal feeding.

- **New Zealand:** We consider the final paragraph of this section should be a simple statement of the Codex mandate and read as follows:

  "This Code of Practice, in fulfilling the Codex mandate of consumer protection, only addresses food safety."

- **European Community:** This paragraph should be replaced by the following:

  "While recognising that, in its totality, a feed safety system would address animal health, ***animal welfare*** *and environmental issues, in addition to consumer health, this Code of Practice, in fulfilling the Codex mandate of consumer protection, only addresses food safety. Notwithstanding this, best efforts have been made to ensure that the recommendations and practices in this Code of Practice will not be detrimental to the more general animal health****, animal welfare*** *and environmental aspects of animal feeding".*

  COMMENT: The European Community proposes that the Task Force address issues relating to animal health, animal welfare and the environment with a view to detailed consideration by the Codex Committee on General Principles. Animal health, animal welfare and the environment should be regarded as legitimate factors to be taken into consideration in the context of animal nutrition.

- **OIE:** The second paragraph of this section should be limited to the second sentence:

  "This Code of Practice, in fulfilling the Codex mandate of consumer protection, only addresses food safety." (delete the other two sentences).

SECTION 3. DEFINITIONS

For the purpose of this Code;

Feed (Feedingstuffs): Any single or multiple material whether processed, semi-processed or raw, which is intended to be fed directly to food producing animals.

Feed Ingredient: A component part or constituent of any combination or mixture making up a feed, whether or not it has a nutritional value in the animal's diet, including feed additives. Ingredients are of

Plant, animal or aquatic origin, and are organic or inorganic substances.
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].

- **Brazil:** For Brazil it is important to include "pastoreo" and "pastoreo en liberdad" (in Spanish) or "grazing" or "free-range feeding" (in English) definitions in this section.

  Justification – these expressions have different meanings in Spanish and English. In Portuguese and Spanish, both "pastoreo" and "pastoreo en liberdad" have the same meaning, which is animal in the grassland (grazing).

  For Brazil it is necessary to establish which substances are considered "Feed additive", in order to avoid doubts about these substances, and to check the necessity of inclusion of new definitions to identify groups or substances according its characteristics or activities, mainly those ones with the purpose to improve feed efficiency and animal performance.

- **Switzerland:** In the definition of "Feed Additives", proposal: Remove brackets. Proposal: Add: *"…improve animal performance **or has an environmental impact**"*. (Risks to the health of consumers may be reduced be certain additives.)

- **United States:**

  *"**Feed Ingredient:** A component part or constituent of any combination or mixture making up a feed, whether or not it has a nutritional value in the animal's diet, including feed additives. Ingredients are of plant, animal or aquatic origin, and are organic or inorganic substances."*

  *"~~**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: Combine "Feed Ingredient" and "Feed Additives" definitions under the "Feed Ingredient" term. The focus of this draft code is consumer health and safety. The two definitions are essentially the same. It is understood the purpose of feeding animals is to improve their performance. With the combination of these two definitions the term "Feed Additives" will need to be stricken from the following text – Section 4.3 Traceability and Record Keeping, 4.5.1 Veterinarian Medicines, and 5.0 Industrial Production of Animal Feeding. Our recommendation for the "Feed Ingredient" definition is as follows:

  *"**Feed Ingredient:** A component part or constituent of any combination or mixture making up a feed, whether or not it has a nutritional value in the animal's diet~~, including feed additives~~. Ingredients are of plant, animal or aquatic origin, and are organic or inorganic substances."*

- **CEFS:** Processing aids are used in the production of certain feed materials and are not defined in the draft Code of Practice on Good Animal Feeding. Codex (see in Food Labelling – Complete texts, 2001) and national legislations recognise that processing aids are not additives.

  Consequently, we propose to include in the definition of feed additives the following sentence: *"Technically unavoidable residues of processing aids necessary for the manufacture of feeds and feed ingredients and not intended to have an effect in the final product or on animal health are not considered as feed additives."*

- **OIE:** ***"Feed Ingredients"*****:** modification to last sentence:

  "Ingredients are of plant or ~~aquatic~~ animal origin, and are organic or inorganic substances." (The inclusion of "aquatic" makes no sense in this sentence!)

Medicated feedingstuffs: Any feed which contains veterinary drugs as defined in the Codex Alimentarius Commission Procedural Manual.

- **Canada:** The term medicated feedingstuff does not appear in the code. Rather, "medicated feed" is referred to in Section 5, number 11. Accordingly, Canada suggests that the current definition for *"medicated feedingstuff"* be renamed as *"**medicated feed**"*.

- **Egypt (EOS):** All the 5 definitions included in this section are clear enough and well defined.

- **United States:**

  *"**Medicated feed~~ingstuffs~~:** Any feed which contains veterinary drugs as defined in the Codex Alimentarius Commission Procedural Manual."*

  Rationale: Strike "ingstuffs". The word "feedingstuffs" is not consistent with the other definitions. The only reference to "medicated feed" is in Section 5, number 11.

- **ICFMH/IUMS:** mentions as follows: As mentioned in 5.4.1., there are difficulties in distinguishing between the definitions of "Feed additives" and "Medicated feedingstuffs". Some additives may have dual purposes in the feed, such as the addition of vitamins which may have physiological impact on the performance of the animals but also may be added with the purpose to improve the colour of the animal product, e.g. eggs and farm fish. If the last sentence in square brackets in the definition of "Feed additives" is maintained, then the important issue of Growth promoters clearly will fall under the definition but it also naturally falls under the definition of "Medicated feedingstuffs" in which is mentioned "veterinary drugs" as defined in the Codex Procedural manual, p. 47.

  In order to clarify the borderline between the different definitions and to improve easier understanding of the different concepts, it is proposed to include the definition of "Veterinary Drugs" in the Procedural manual in the present text. In this definition is included: "…modification of physiological functions or behaviour" and this might cover also growth promoters.

  Editors comment:

  The definition of Veterinary Drugs in the Procedural Manual, 12th edition, p. 42-43, is as follows: "***Veterinary drug*** *means any substance applied or administered to any food producing animal, such as meat or milk producing animals, poultry, fish or bees, whether used for therapeutic, prophylactic or diagnostic purposes or for modification of physiological functions or behaviour."*

Undesirable substances: Contaminants and other substances, which are present in and/or on the product intended for animal feeding and which constitute a risk to the health of consumer, including food safety related animal health issues.

- **Canada:** Given that many feeds are marketed in bulk and are not "labelled" in the traditional sense of the word, it may be useful to define a label as follows:

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

- **Senegal:** (In the comments to section 4.2 "Labelling" Senegal mentions the following concerning definitions.)

  It appears that certain frequently appearing terms, which are admittedly not used in this pre/draft, are not defined. To the extent that they could appear during the drawing up of this code of usage, we propose the following definitions:

*"**SIMPLE FOODSTUFFS***

Simple foodstuffs are taken to mean the different materials made up of vegetable or animal products in their natural state, fresh or preserved, and the derivatives of their industrial processing, as well as the different organic and non-organic substances for use as such in animal foodstuffs to be administered orally."

*"**COMPOUND FOODSTUFFS***

Compound foodstuffs are taken to mean simple mixtures of foodstuffs, with or without additives, for use in animal feeds, and which can be divided into:

- *Complete compound foodstuffs*
- *Complementary compound foodstuffs*
- *Mineral compound foodstuffs*
- *Molassed compound foodstuffs."*

*"*** Complete compound foodstuffs** are mixtures of animal feeds the composition of which can ensure the animals' daily food intake."*

*"*** Complementary compound foodstuffs** are simple foodstuffs the composition of which means that they should be associated to other feeds to ensure the animals' daily food intake."*

*"*** Mineral compound foodstuffs** are complementary foodstuffs mainly made up of minerals (generally more than 40% of ash by gross weight)."*

*"*** Molassed compound foodstuffs** are complementary foodstuffs prepared using molasses and containing a significant proportion of total sugars expressed in saccharose."*

*"**FOOD PRE-MIXES***

By food pre-mixes we mean a mixture of one or more additives that may or may not be accompanied by minerals."

- **ICFMH/IUMS:** mentions contaminants, and proposes to include a reference to the Procedural manual, if the definition of contaminants in the Procedural manual apply in the same manner as the reference to the manual under "Medicated feed".

  Editors comment:

  The definition of "Contaminant" in the Procedural Manual, 12th edition, p. 41, is as follows:

  *"**Contaminant** means any substance not intentionally added to food, which is present in such food as a result of the production (including operations carried out in crop husbandry, animal husbandry and veterinary medicine), manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food or as a result of environmental contamination. The term does not include insect fragments, rodent hairs and other extraneous matter."*

SECTION 4. GENERAL PRINCIPLES AND REQUIREMENTS

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 GMP, and where at all possible Hazard Analysis and Critical Control Point (HACCP) principles[3], should be followed. Potential sources to contamination from the environment in certain localised areas should be considered.

- **Argentina:** Correct the first paragraph:

  "Foodstuffs and ingredients of foodstuffs must be obtained and stored in stable conditions so that they may be protected ~~to protect them~~ from contamination by pests or by ……." (This is repeated)

- **Brazil:** *"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. Feed should be in good …"*

  Comments…

  Brazil proposes to add the word *"utilization"* at the end of the first paragraph, to read as follows: *"…during the production, handing, storage ~~and~~ ,transport **and utilization**. Feed…"*.

- **Canada:** In the first paragraph, Canada requests clarification of those situations where environmental contamination should be considered and proposes amending the last sentence of the first paragraph as follows:

  "When potential sources of contamination from the environment could result in the production of foods of animal origin that would present a risk to consumer health, they should be considered."

- **ICFMH/IUMS:** Feed Additives and Medicated feeds should logically also be mentioned in this section, since what is mentioned, applies equally and even more to these substances. It is partly mentioned under 5.4.1. but not in the same manner and not so explicit.

- **IDF:** Section 4 – general: The general principles are valid for both the production of feed ingredients and feeds and for feed use. However, the target of some of the sub-sections in Section 4 relates merely to industrial manufacture of feed, such as labelling. Consequently, section 4 need be revised with regard to identifying which of the individual text is generally applicable and which are meant for specific segments of the feed chain.

  As is explained in the general comments, we are of the opinion that GMP and HACCP (or a comparable approach based on the principles of HACCP) is appropriate and possible in each link of the feed (ingredient) chain. Therefore we propose that the last two sentences of the first paragraph read as follows:

  *"Feeds **and feed ingredients** should be in good condition and meet generally accepted quality standards. **GAP, GMP and the Hazard Analysis and Critical Control Point (HACCP) system should be followed. Where appropriate comparable HACCP-based approaches may be followed".***

- **OIE:** Change first sentence: *"Feed and feed ingredients should be obtained and **properly** maintained as to protect ~~feed and feed ingredients~~ **them** from ~~contamination by~~ pests, ~~or by~~ chemical**s**, physical or microbiological ~~contaminants~~ **contamination** or any other objectionable substances during production, handling, storage and transport."*

[3] Hazard Analysis and Critical Control Point, as defined in the Annex to the Recommended International Code of Practice on General Principles of Food Hygiene (CAC/RCP 1 – 1969, Rev. 3 (1997))

Parties that produce feed ingredients or feeds, those that rear animals for use as food and those that produce such animal products need to collaborate to identify potential hazards and their levels of risk to human health. Such collaboration will enable the development and maintenance of appropriate risk management options and safe feeding practices.

- **Senegal:** Add the following to the end of section 2: *"Parties producing ingredients for animal foodstuffs or the foodstuffs themselves must inform users as to the nature of the ingredients used and entering into the composition of such foodstuffs"*

4.1. FEED INGREDIENTS

Feed Ingredients should be obtained from safe sources, and should meet defined standards. Manufacturers of feed additives in particular should provide clear information to the user to permit correct and safe use. Monitoring of feed ingredients should include inspection and sampling and analysis for contaminants using risk based protocols. Feed ingredients should meet acceptable, and if applicable, statutory standards for levels of pathogens, mycotoxins, pesticides, and contaminants that may give rise to consumer health hazards.

- **Australia:** Suggests that the defined standards (first sentence) be either referenced or defined. Finds that the statement "manufacturers should provide clear information to users to permit correct and safe use" (second sentence) will be difficult in certain circumstances. For instance, in the case of meat meal, it is unlikely a meat renderer will know the product range the feed manufacturer will use the constituent meat meal for.

- **Brazil:** *"Feed Ingredients should be obtained from safe sources, and should meet defined standards. Manufacturers of feed additives in particular should provide clear information to the user to permit correct and safe use. Monitoring of feed ingredients should include inspection and sampling and analysis for contaminants using risk based protocols. Feed ingredients should meet acceptable, and if applicable, statutory standards for levels of pathogens, mycotoxins, pesticides and contaminants that may give rise to consumer health hazards."*

  Comments:

  Concerning this item, Brazil proposes that the Committee elaborate specific norms about pathogenic agents, mycotoxins, pesticides and contaminants in animal food.

- **Canada:** To be more consistent with the Codex definition of hazard, Canada suggests revising the latter part of the last sentence as follows:

  "…. statutory standards for levels of pathogens, mycotoxins, pesticides and contaminants that may ***adversely effect consumer health****."*

- **Norway:** The title should be amended to *"FEED AND FEED INGREDIENTS"*.

  - A negative list of feed ingredients, which are prohibited for use in animal nutrition should be established.
  - Feed and feed ingredients consisting of or containing GMO, or produced from GMO, should be approved by the national authorities.
  - For countries wishing to draw up a Positive list of ingredients (non-additive), appropriate criteria should be considered within the framework of the Task Force.

- **United States:** (Second sentence)

  "~~*Manufacturers of feed additives in particular should provide clear information to the user to permit correct and safe use*~~." – "*Feed ingredient manufacturers should provide instructions for correct and safe use."*

  Rationale: "Feed ingredients" includes the term "feed additives" in its existing definition.

  Reword the second sentence to correspond definition with 4.1 Feed Ingredient section as denoted.

- **European Community:** The title should be amended to read as follows; *"FEED AND FEED INGREDIENTS"*.

  The following paragraph should be added: *"Feed or feed ingredients consisting of or containing GMOs, or produced from GMOs, should be approved by the national authorities"*.

  - 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. The European Community is particularly concerned about the possible use of certain ingredients that pose a risk to human health, such as mammalian protein in ruminants, urine, faeces or treated seeds.
  - 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.

- **ICFMH/IUMS:** Why are additives and medicated feedingstuffs omitted? Is it not necessary to obtain these from safe sources etc.?

- **IDF:** As is commented in Section 4 general, the production and handling of feed ingredients should be based on GAP and GMP. Besides, businesses dealing with the collection, processing, distribution and transportation of feed ingredients should in our view apply the HACCP-system. The primary production of (raw materials for) feed ingredients should preferably be based on codes of GAP, which are developed according tot the principles of HACCP (see comments section 6.1.1. and 6.2.1).

  The statement that manufacturers should provide clear information to users to permit correct and safe use will be difficult in certain circumstances. For instance, in the case of meat meal, it is unlikely a meat renderer will know all the product range the feed manufacturer will use the constituent meat meal for. Therefore we propose that add to following wording to the second sentence:

  ''Manufacturers of ***feed ingredients and*** *feed additives in particular should provide clear information to users to permit correct and safe use****, if the purpose for which the ingredient is intended is indicated.***''

  The defined standards (first sentence) should be either referenced to international standards or defined. As is said in the general comments references to national standards and regulation should be avoided.

4.2. LABELLING

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 statutory requirements and should describe the feed and provide instructions for use. Labelling, or the accompanying documents, should contain:

- Information about the species or category of animals for which the feed is intended,
- the purpose for which the feed is intended,
- a [full] list of feed ingredients, including appropriate reference to additives,
- trade name where appropriate,
- the name and address of the producer or intermediates,
- registration number if available,
- nutrition profile,
- directions and precautions for use,
- lot identification,
- manufacturing date, and
- use before or expiry date.

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

- **Argentina:** Delete the paragraph in square brackets.

  Add a last paragraph as follows:

  "The own producer or producer of foodstuffs at the farms (Section 6) shall be exempt from the requirement to label the finished or ready-to-eat product".

- **Australia:** Pursuant to the comments already made (in the general comments) nutritional profile, directions and precautions for meat meal is unwarranted, as having both the lot identifications and manufacturing date, when one or the either would suffice. The point "a [full] list of feed ingredients, including appropriate references to additives" (3rd indent), should have added "***in descending order of proportion***" to be consistent with Codex Labelling Standard.

- **Brazil:**

  "Labelling should be clear and informative as to how the user ……. Labelling, or the accompanying documents, should contain:

  - *information about the species or category of animals for which the feed is intended,*
  - *the purpose for which the feed is intended,*
  - *a {~~full~~} list of feed ingredients, including appropriate reference to additives,*
  - *trade name where appropriate,*
  - *the name and address of the producer or intermediates,*
  - *registration number if available,*
  - ~~*nutrition profile*~~ ***guaranteed levels***
  - *directions and precautions****, conservation*** *for use ,*
  - *lot identification,*
  - *……."*

  Comments:

  Change the bullet point number 3, to replace the word *"~~full~~"* by: *"one list of feedstuffs levels with additive reference*". Replace the words *"~~nutritional profile~~"* by *"guaranteed levels"* in bullet point number 7.

  Justification – In practice, animal food do not have constant nutritional composition because variations occur according to the feedstuffs used in each lot. Therefore, minimum quality standard requirement will

be met if required to put minimum and maximum guaranteed levels of the different nutrients. Add the word *"conservation"*, in bullet point number 8.

- **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,*
  - *the name and address of the* ***manufacturer****,*
  - *directions and precautions for use,*
  - *lot identification* ***information (e.g., date of manufacture, lot number, registration number, etc.) which would allow the product to be traced in the event of a recall****,*
  - *trade name where appropriate."*

  The requirement for a list of ingredients on the label is problematic given the use of least-cost formulation by the feed industry. With a few exceptions, feed labels in Canada are not required to contain a list of ingredients provided they contain the statement that a list of ingredients can be obtained from the manufacturer. 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.

  The relationship between the requirement for a "use before or expiry date" and consumer health is also unclear.

  The issue of labelling of foods obtained from biotechnology is still being considered by the Codex Committee on Food Labelling (CCFL). The Task Force should not attempt to predetermine the outcome of the CCFL discussions by mandating the labelling of genetically modified organisms (GMO) and their products in feeds.

- **Malaysia:** 3rd indent: Suggests that *"- a [full] list of feed ingredients, including appropriate reference to additives,"* replaced with: *"- a list of feed ingredients ....."*.

  COMMENT: Allowable nutrient additives and other analyses are usually not mentioned in practice due to trade confidentiality.

  6th indent: Suggests that *"- nutrition profile,"* replaced with: *"- nutrition profile* ***must include proximate analysis, calcium and phosphorus contents****."*

  COMMENT: The statement *"- [Genetically modified organisms and derived products should be labelled.]"* would imply practical difficulties of testing and enforcing the regulations to GMO. Should leave it to national regulatory authorities of individual countries to institute control on GMO.

- **New Zealand:** Suggests adding the following words to the end of the first sentence so that consumer protection remains a key objective and puts the responsibility on the user to follow and maintain good practices:

  "Labelling should be clear and informative as to how the user should handle, store and use feed and feed ***ingredients so that animals consuming the feeds will not present a risk to humans eating them or their products****."*

- **Norway:** The proposed requirements for labelling are generally supported. The list of feed ingredients should indicate where applicable, the exact percentage with a tolerance level. Information of GMO should be mandatory if such ingredients are present.

- **Senegal:** User information must also be provided, especially in the case of the possible presence of genetically modified organisms.

  We propose therefore to add to the end of the subsection: *"Foodstuffs in which at least one of the ingredients has been obtained by genetic engineering must carry specific information, through labelling and/or specific accompanying documents".*

- **Switzerland:** 3rd indent: Proposal for new wording: *"- a list of feed ingredients, including feed additives if statutory required".*

  GMO (last sentence): Remove brackets and delete *"...~~and derived products~~ ...".*

- **United States:**

  "~~Labelling should be clear and informative so 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:"

  ~~- information about the species or category of animals, for which the feed is intended,~~

  ~~- the purpose for which the feed is intended,~~

  ~~- a [full] list of feed ingredients, including appropriate reference to additive,~~

  ~~- trade name where appropriate,~~

  ~~- the name and address of the producer or intermediates,~~

  ~~- registration number if available,~~

  ~~- nutrition profile,~~

  ~~- direction and precautions for use,~~

  ~~- lot identification,~~

  ~~- manufacturing date,~~

  ~~- use before or expiry date~~

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

  Rationale: In the first paragraph, strike the first sentence since it is a repeat of the second, which describes the intended meaning of food safety and product traceability.

  We propose to replace the above list by listing items that are required to meet the objective of food safety:

  - *feeding directions that provide sufficient information for correct use (i.e. intended species)*
  - *appropriate cautions and warnings (as warranted, i.e. certain medications)*
  - *information (i.e. date of manufacture, lot number, registration number, etc.) which allows the product to be traced in the event of a recall*
  - *contact information of manufacturer or registrant"*

  The following items should be struck: "full labelling of ingredients", "trade name", "nutrition profile", and "use before or expiry date" since these are factors irrelevant to food safety.

  Strike the "Genetically modified organisms and derived products should be labelled" sentence since this subject is being handled by another Codex task force and this draft should wait for their recommendation before commenting. 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:** All indents in this section are replaced by the following:

  - "*information about the species or category of animals for which the feed is intended****, and its purpose****;* (second indent is deleted)
  - *a **full** list of feed ingredients, including appropriate reference to additives****, indicating where applicable the exact percentages with a tolerance level****;*
  - *trade name, where appropriate;*

- *the name and address of the producer or intermediates;*
- *registration* ***or approval*** *number* ***of the feed businesses operator,*** *if applicable,*
- *nutrition profile;*
- *directions and precautions for use* ***and storage****;*
- *lot identification;*
- *manufacturing date, and*
- *use-before or expiry date*

Feed and feed ingredients consisting of, containing or produced from GMOs should be labelled with references to genetic modification."

COMMENT:

- The first and second indents could be combined in order to simplify the layout.
- It should be possible to indicate the quantitative composition of the feed with a tolerance level, if applicable, in one member country. The same should apply as regards identifying the business operator.

- **ICFMH/IUMS:** The requirements are to some extent desirable and seem to be inspired from labelling of foods. It is however suggested to modify and amend the text to meet the special requirements in agriculture in order to make it realistic. What is the expiry date of cereals – impossible to set? Take a consignment of e.g. hay or straw purchased between farmers and explain how many of the eleven strokes are necessary.

  Who can predict the expiry date of beets for feeding, mask from sugar or beer production? Nobody. So on and so fort. The eleven strokes apply best to feed additives and medicated feedingstuffs but certainly not to most of the single raw materials of feeds.

  To set up requirements which are impossible to fulfil will have the effect of weakening the whole paper. Modifications are thus urgently needed.

- **IDF:** Pursuant to the comments for section 4.1, nutritional profile, directions and precautions for meat meal is only warranted if the purpose for which the ingredient is intended is indicated.

  If the ''use before'' or expiring date is indicated, the labelling of the manufacturing date is superfluous. To be consistent with the Codex labelling standard, the point ''a [full] list of feed ingredients, including appropriate reference to additives'', should have added:

  *"****in descending order of proportion****."*

- **OIE:** Modify first sentence: *"Labelling should be clear and informative as to how the user should handle, store and use feed and feed ingredients* ***so that animals consuming the feed will not present a risk to humans eating them or their products.****"*

  Modify the third bullet:

  "- a full list of feed ingredients, including appropriate reference to additives, ***and animal species of origin,****"*

  Remove sentence on GMO under square parenthesis!

4.3. TRACEABILITY AND RECORD KEEPING

Traceability 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 feeds and feed ingredients for as long as appropriate to enable trace-back should a safety problem emerge.

- **Canada:** Canada is of the opinion that any work on traceability needs to be done in the context of the instructions arising from the 49th Session of the CCEXEC and shares the view of CCEXEC that, as a priority, CCGP should discuss as to when and to what extent traceability should be considered as a risk management option within the *Codex Working Principles for Risk Analysis*. Canada notes that initial guidance from the CCGP should be forthcoming after its meeting in April 2002. Canada supports work by the Ad hoc Task Force on traceability issues related to the identification and withdrawal of products that represent a consumer health hazard.

  Canada recognizes the importance ascribed by Member governments and Non-Governmental Organizations to issues such as the use of GMOs. Canada strongly supports the need for a safety assessment, with respect to food safety and consumer health, of GMOs and GMO derived materials used in feeds.

  Canada notes that the 24th Session of the Commission adopted the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods, Livestock and Livestock Products which provide specific criteria for feedstuffs including the absence of genetically engineered/modified organisms and products thereof.

  Canada suggests that the Code of Practice on Good Animal Feeding could reference the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods, Livestock and Livestock Products and include a recommendation that, where a manufacturer produces feedstuffs in accordance with the requirements of the Guidelines, the information necessary to demonstrate that the feedstuffs satisfy those requirements be available to farmers, feedlot operators and other users. This would include, for organic producers and other producers with similar concerns, information regarding the inclusion or not of GMO ingredients.

- **Norway:** In addition to records, samples of feed ingredients and feed produced should be kept for analysis if necessary.

- **United States:**

  *"**To the extent practicable**, traceability of feed and feed ingredients~~, including additives,~~ should be ~~enabled~~ **maximized** 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 feeds and feed ingredients for as long as appropriate to enable trace-back should a safety problem emerge."*

  Rationale: Traceability of raw materials may be difficult or even impossible for certain type of feed ingredients, particularly bulk ingredients that are commingled. Also, to provide dedicated bulk ingredient handling systems to allow for on-farm traceability would take an enormous amount of finances and time to implement for little benefit.

  The Codex Committee on General Principles should be allowed to define the topic of traceability for several Codex groups before the Task Force on Animal Feeding continues its efforts on this subject.

  First paragraph, first sentence, add "To the extent practicable," to be realistic about the ability to trace all feed ingredients. Strike "enabled" and replace with "maximize". Enabled guarantees certainty, which is difficult. Also, strike "including additives" since it will not be needed if the suggested combining of "feed ingredient" and "feed additive" definitions are accepted.

- **European Community:** The first paragraph should be replaced by the following:

  *"Traceability of feed and feed ingredients, should be **ensured through** 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 feeds and feed ingredients for as long as appropriate to enable trace-back should a safety problem emerge**, **and representative samples of feed ingredients and feed produced should be kept for a suitable period of time if analysis becomes necessary.***"

  COMMENT:

  - In the first line it is not necessary to refer to "additives" because the term "ingredients" already includes them.
  - 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.

- **FEFAC:** proposes to replace the mentioning of "for as long as appropriate" in the last phrase with the term "over a fixed time period, as appropriate …" to read: *"Records should be maintained and readily available regarding the production, distribution and use of feeds and feed ingredients **over a fixed time period, as appropriate**, to enable trace-back should a safety problem emerge"*

Feed manufacturers should keep records containing full details of the supplier and the 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 in voices on received goods), flow diagrams, master formulae, mixing sheets, daily production logs, files of complaints, files of manufacturing errors and corrective actions taken, analytical results and investigations of out-of-tolerance sample results, records respecting the disposition of returned and recalled feeds, records of the disposition of flushed or recovered material, records of mixer validation and scale/metering device verification, etc.

- **Argentina:** Add a last paragraph as follows:

  "For the own producer or producer of foodstuffs at the farms (Section 6) it may not be necessary to maintain most or all of these registers as long as constant formulas are used that include a follow-up on the animal itself."

- **Australia:** mentions that a problem arises when bulk ingredients stored in silos have further suppliers added of the same ingredient, but from a different source, as significant mixing occurs. The list of records should be captured under the sentence; *"These records could include **but are not limited to**:"*

- **United States:**

  "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), ~~flow diagrams~~, master formulae, mixing sheets, daily production logs, files 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, records of the disposition of flushed or recovered material, records of mixer validation and scale/metering device verification, ~~etc~~."

  Rationale: Strike "flow diagrams", and "etc." as they are not necessary for either animal or human health safety.

- **FEFAC:** proposes to insert the term "formula alterations" in the first indent after …"master formula, …" to read: *"- inventory records …, master formula, **formula alterations,** …"*.

- **IDF:** Effective traceability is related to organization and management, while labelling and record keeping are means to assist in traceability. Labelling does not constitute traceability.

  The list of records should in our view be captured under the sentence: "***If appropriate**, these records **should** include, **but are not limited to**:*"

3.4.1. Special Conditions Applicable to Emergency Situations [to be developed]

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, 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 that might be required.

- **Malaysia:** *"3.4.1."* (typo) should be *"4.3.1. Special Conditions Applicable to Emergency Situations [to be developed]"*

  COMMENTS: The whole of Section 4.3 should be under square bracket since discussions on traceability are yet to be concluded at the various other Codex meetings.

- **Switzerland:** *"4.3.1"* (instead of *"3.4.1"*) [to be developed]

- **United States:**

  *"~~**3.4.1**~~ **4.3.1** Special Conditions Applicable to Emergency Situations [to be developed]"*

  Rationale: Strike "3.4.1" and replace with "4.3.1" for consistent numbering.

4.4. INSPECTION AND CONTROL PROCEDURES

Feed and feed ingredient manufacturers and other relevant parts of industry should practice selfregulation/autocontrol to secure compliance with required standards for production, storage and transport. It will mostly 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 wholesome. Inspection and control procedures should be used to encourage that feeds meet requirements in order to protect consumers against food-borne hazards[4]. Inspection system should be designed and operated on the basis of objective risk assessment appropriate to the circumstances[5]. Preferably the risk assessment methodology employed should be consistent with internationally accepted approaches. Risk assessment should be based on current available scientific evidence.

- **Argentina:** Change the paragraph as follows:

  "manufacturers of animal feeds and ingredients for these feeds, as well as other appropriate industrial groups, must adopt self-regulation/self-control systems in order to ensure that standards laid down for production, storage and transport of these products are respected. In most cases it will also be necessary to establish official regulation systems to check that production, distribution and use of feeds and ingredients thereof are carried out in such a way that animal-based foodstuffs for human consumption are both safe and harmless. Inspection and control procedures shall be applied in order to encourage compliance with the requirements laid down for feeds, in order to protect human health against dangers transmitted by foodstuffs.

  Inspection systems …….. at the moment."

[4] Principles for Food Import and Export Inspection and Certification (CAC/GL 20-1995)
[5] Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems (CAC/GL 26-1997)

- **Australia:** In the sentence "Inspection and control procedures ….." in line 5, the following words "the production of feeds" should be inserted and the word "feeds" after the words "encourage that" should be deleted. The sentence then reads as follows: *"Inspection and control procedures should be used to encourage **the production of feeds** that meet requirements in order to protect consumers against food-borne hazards."*

- **Canada:** Canada suggests rewriting the first paragraph as follows:

  "Official regulatory programmes should be established to verify that feeds and feed ingredients meet requirements in order to protect consumers against food-borne hazards. Inspection systems should be designed and operated on the basis of objective risk assessment appropriate to the circumstances. The risk assessment methodology employed should be based on the currently available scientific evidence and consistent with internationally accepted approaches. Feed and feed ingredient manufacturers and other relevant parts of industry should implement monitoring activities to ensure compliance with required standards for production, storage and transport."

- **Norway:** The Code should encourage the establishment of self-supervision programmes and quality assurance systems. Monitoring and control should only be carried out by official competent authorities or delegated bodies which have been officially recognised.

- **Switzerland:** 2nd sentence: delete *"... ~~mostly~~ ..."*.

- **United States:**

  *"Feed and feed ingredient 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 ~~mostly 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 wholesome. Inspection and control procedures should be used to encourage that feeds meet requirements ~~in order to protect consumers against food borne hazards~~. Inspection system should be designed and operated on the basis of objective risk assessment appropriate to the circumstances. Preferably the risk assessment methodology employed should be consistent with internationally accepted approaches~~. **and** ~~Risk assessment should~~ be based on current available scientific evidence."*

  Rationale: Strike "mostly also" to clarify second sentence first paragraph. Strike " in order to protect consumers against food borne hazards" since it is stated in the Section 2 Purpose and Scope.

- **European Community:** The entire section should be replaced by the following:

  *"Feed and feed ingredient manufacturers, and other relevant par**ti**es **in the feed chain**, should practice self-regulation/auto-control to **ensure** compliance with required standards of production, storage and transport. It will ~~mostly also~~ be necessary **for official competent authorities or delegated bodies (which have been officially authorised) to establish** official regulatory programmes to check that feed and feed ingredients are produced, distributed and used in such a way that foods of animal origin **intended** for human consumption are both safe and wholesome. Inspection and control procedures should be used to **help ensure** that feeds meet requirements in order to protect consumers ~~against food-borne hazards~~. **The** inspection system should be designed and operated on the basis of objective risk assessment appropriate to the circumstances*.. ~~Preferably~~ The risk assessment methodology employed should **preferably** be consistent with internationally accepted approaches. Risk assessment should be based on current available scientific evidence.*

  *Monitoring of feeds and feed ingredients ~~whether by industry or official inspection bodies~~, should include inspection and sampling and analysis to detect unacceptable levels of ~~contaminants and other~~ undesirable substances **and should be inspected, supervised and controlled by official inspection bodies or delegated bodies**."*

  Footnote:"Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems (CAC/GL 26-1997), **5 CL 2001/36-AF."***

COMMENT: The primary responsibility for ensuring food safety lies with companies and/or industry organisations via their own checks and controls. However, it is necessary for governments to have inspection procedures too. Inspection and control procedures may be applied either by the competent authority itself or another body, which has been officially recognised.

- **IDF:** The sentence that starts with "Inspection and control procedures should….." (line 5), should in our view read:

  "Inspection and control procedures should be used to encourage that ***the production of feed ingredients and feeds meet requirements in order*** *….. etc."*

- **OIE:** Modify second sentence:

  *"**It is recommended that*** ~~*will mostly also be necessary for*~~ *official 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 wholesome."*

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

- **United States:**

  "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 contaminants and other undesirable substances."*

  Rationale: Strike "and" and insert "comma" to clarify second paragraph.

4.5. HEALTH HAZARDS ASSOCIATED WITH ANIMAL FEED

All feed and feed ingredients should meet minimum safety standards. It is essential that levels of undesirable substances are sufficiently low that their concentration in food for human consumption is consistently below the level of concern. Maximum residue limits, such as those established by the Codex Alimentarius Commission, may be useful in determining minimum safety standards.

- **Australia:** Finds that in this section it should be noted participating countries are able to set their own safety standards.

- **New Zealand:** New Zealand suggests that reference to the maximum residue limits should be to foods of animal origin rather than to animal feed, and therefore proposes deleting the third sentence.

- **Norway:** Norway supports the establishment of maximum limits for undesirable substances or products.

- **Switzerland:** Last sentence: delete *"... ~~may be useful in~~ ..."*; write *"**should be considered in**"*….

- **United States:**

  "All feed and feed ingredients should meet minimum safety standards. It is essential that levels of hazardous substances are sufficiently low that their concentration in food ~~*for human consumption*~~ *is consistently below the level of concern for that hazard. Maximum residue limits, such as those established by the Codex Alimentarius Commission, may be useful in determining minimum safety standards."*

  Rationale: Strike "for human consumption" as it is not necessary for the meaning of the sentence and is stated in Section 2 Purpose and Scope.

- **European Community:** The first sentence should be deleted. This sentence is worthy but bland. See comments on 4.1. as regards the negative and positive lists of feed ingredients.

5.4.1. Veterinary Medicines and Feed Additives

Veterinary medicines and feed additives should be assessed for safety and used under stated conditions of use as pre-approved by national or international authorities. Only veterinary medicines legally authorised for administration to food producing animals should be included in feed. Borderlines between feed additives and veterinary medicines must be set to avoid misuse. All veterinary medicines and feed additives should be received, handled and stored to maintain their integrity and to minimise misuse or unsafe contamination. Feed containing them should be used in strict accordance with clearly defined instructions for use.

Antibiotics in particular should not be used in feedingstuffs in the absence of public health safety assessment.[6]

- **Argentina:** Regulation of the use of antibiotics is outside the scope of this Working Group. It would be more appropriate to express the Working Group's concern for the use of antibiotics in animal feeds and thus recommend the following:

  "Approval of the use of an antibiotic by a national health authority, which may be administered through foodstuffs for therapeutic, preventive or growth stimulation reasons, must follow a structured approach involving a prior analysis of harmlessness for public health, as well as the appropriateness of its use, the species authorised, dosage, metabolic age, restrictions, periods of withdrawal (deficiency periods), etc."

  In this connection, and in order to maintain a degree of consistency, the following sentence should be replaced:

  "~~In particular, antibiotics should not be used in feeds without a prior study being carried out to prove their harmlessness to public health~~"

  The following should be inserted:

  "Antibiotics that can be used in feeds should be officially authorised for use in the animal species in question in the doses and metabolic age agreed and under the supervision of a veterinary surgeon."

- **Brazil:** *"Veterinary medicines and feed additives should be assessed for safety and used under stated conditions of use as pre-approved by national or international authorities(5). Only veterinary medicines legally authorized to administration to food producing animals should be included in feed. Borderlines ……misuse of unsafe contamination. Feed containing them should be used strict accordance with clearly defined instructions for use."*

  "~~Antibiotics in particular should not be used in feedingstuffs in the absence of public health safety assessment(5)~~"

  Comments:

  Exclude the last paragraph " in particular, do not use antibiotics in animal food…".

  Justification – the first phrase of the first paragraph is more complete and includes the same purpose, so we consider that only the addition of number "5" in the baseboard after the word *"authorities"* is necessary.

- **Canada:** The statement*: "Borderlines between feed additives and veterinary medicines must be set to avoid misuse."* does not appear to be related to the protection of consumer health. The linkage should be demonstrated or the statement should be deleted from the code.

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

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

[6] WHO Global Principles for the Containment of Antimicrobial Resistance in Animals Intended for Food, June 2000, Geneva, Switzerland.

- **Norway:** Reference should be made to the "Recommended International Code of Practice for the Control of the Use of Veterinary Drugs" set out by the CODEX Committee of Residues of Veterinary Drugs in Food.

- **Switzerland:** *"4.5.1."* instead of *"5.4.1."*.

  Last sentence: replace *"Antibiotics"* by *"**Antimicrobials**"* ...;add: "***and in the absence of veterinary prescription.**"*

- **United States:**

  "~~5.4.1~~ 4.5.1. Veterinary Medicines ~~and Feed Additives~~"

  Rationale: Strike "5.4.1" and replace with "4.5.1" to provide consistent numbering.

  "Veterinary medicines ~~and feed additives~~ should be assessed for safety and used under stated conditions of use as pre-approved by national or international authorities. ~~Only veterinary medicines legally authorised for administration to food producing animals should be included in feed. Borderlines between feed additives and veterinary medicines must be set to avoid misuse~~. All veterinary medicines and feed additives should be received, handled and stored to maintain their integrity and to minimise misuse or unsafe contamination. ~~Feed containing them should be used in strict accordance with clearly defined instructions for use~~."

  "Antibiotics ~~in particular~~ should not be used in feedingstuffs in the absence of public health safety assessment."

  Rationale: Strike the second sentence "Only veterinary medicines legally authorised for administration to food producing animals should be included in feed." as it is redundant information to the first sentence. Strike the third sentence "Borderlines between feed additives and veterinary medicines must be set to avoid misuse." This sentence is ambiguous and does not follow the definition of a feed additive or feed ingredient as set forth in this draft code. Strike the last sentence "Feed containing them should be used in strict accordance with clearly defined instructions for use." This information is covered in Section 4.2 Labelling and by the phrase "used under stated conditions of use as pre-approved by national and international authorities" in the first sentence of this section.

  Strike "and feed additives" throughout the text if the two definitions – "feed ingredients" and "feed additives" are combined as suggested.

- **European Community:** The reference to point 5.4.1. should be replaced by reference to 4.5.1. All paragraphs in this section should be replaced by the following:

  "*Feed additives should be assessed for safety and used under stated conditions of use as pre-approved by national or international authorities. All feed additives should be received, handled and stored to maintain their integrity and to minimise misuse or unsafe contamination. Feed containing them should be used in strict accordance with clearly defined instructions for use.*

  *Veterinary medicines incorporated into feed should comply with the provisions of the Recommended International Code of Practice for the Control of the Use of Veterinary Drugs**. Dividing-lines between feed additives and veterinary medicines must be clearly laid down in order to avoid misuse.*

  Antibiotics should not be used for growth promoting purposes.

  *For purposes other than growth promoters, antibiotics should not be used, in the absence of public health safety assessment***."*

  *Footnote:"** CAC/RCP 38-1993"*

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

  COMMENT: Although a reference to veterinary medicines could be accepted in this Code, the European Community would like to draw attention to the fact that the CODEX Committee of Residues of Veterinary Drugs in Foods has set out a "Recommended International Code of Practice for the Control of the Use of Veterinary Drugs". This Code sets out guidelines on the prescription, application, distribution and control of drugs used for treating animals, preserving animal health or improving animal production.

Veterinary products (including premixes for manufacture of medicated feedingstuffs) used in food-producing animals fall within the scope of this Code.

- **ICFMH/IUMS:** Substitute "Medicine" by *"Drugs"*, the word used in other parts of the draft as well as in other Codex documents.

  The last two lines run as follows: "*Antibiotics in particular should not be used in feedingstuffs in the absence of public health safety assessment.*" From this principle can of course not be deviated.

  Attention is however called to the wording in the Proposed draft code of hygienic practice for fresh meat (CX/MPH 02/4, October 2001), to be discussed at a meeting of the Codex Committee in Wellington, February this year. The wording in this draft runs as follows: *"*Due to possibility of development of antimicrobial resistant strains of pathogens, the competent authority should have an active strategy for the proper use of antibiotics as growth promoters." This important issue might also be included in feed draft.

  When quoting the draft code of hygienic practice for fresh meat, attention is also called to the following wording in the section 5.4 of that code, "Hygiene of feedingstuffs: Animals should not be fed feedingstuffs that: are recognised as likely to introduce zoonotic agents to the slaughter population;" there is a similar formulation related to "Chemical substances".

  This is a very clear statement, which one from a food safety point can recommend also to be adapted in the code of good animal feeding.

- **OIE:** At the bottom of page 5, remove reference #5. This is not necessary and there are other more relevant references on this subject.

5.4.2. Feed and feed ingredients

Feed and feed ingredients should only be marketed or used if they are safe and wholesome, and do not represent a danger to animal or human health or the environment. In particular, feeds and feed ingredients contaminated with undesirable substances in excess of national or international maximum levels should not be marketed or used. As indicated under 4.4, monitoring of feeds and feed ingredients should include inspection and sampling and analysis to detect unacceptable levels of undesirable substances.

Feeds and feed ingredients should not be presented or marketed in a manner liable to mislead the user.

- **Brazil**: *"Feed and feed ingredients should only be marketed or used if they are safe and wholesome, and do not represent a danger to animal or human health or the environment. ~~In particular~~, **F**eeds and feeds ingredients contaminated with undesirable substances in excess of established national or international maximum levels should not be marketed or used. As indicated ……."*

  Comments:

  Exclude the expression *"~~In particular~~"* in the second phrase in the first paragraph, and begin the phrase as follows: *"Feeds and feeds ingredients …"*.

- **New Zealand:** New Zealand suggests that maximum residue limits are only applicable where the safety of human food produced from the animals are in question.

- **Switzerland:** *"4.5.2."* instead of *"5.4.2."*.

- **United States:**

  "~~5.4.3~~ 4.5.2. Feed and Feed Ingredients"

  Rationale: Strike "5.4.2" and replace with "4.5.2" for consistent numbering.

  *"~~Feed and feed ingredients should only be marketed or used if they are safe and wholesome, and do not represent a danger to animal or human health or environment. In particular, **F**feeds and feed ingredients contaminated with undesirable substances in excess of established national or international maximum levels should not be marketed or used. As indicated under 4.4~~, monitoring of feeds and feed*

ingredients should include inspection and sampling to detect any unacceptable levels of contaminants and other undesirable substances."

"Feed and feed ingredients should not be presented or marketed in a manner liable to mislead the user."

Rationale: Strike first sentence of first paragraph as it is a repeat of the second sentence. Strike "In particular," as it will not be needed if the first sentence is stricken. Strike "As indicate under 4.4" as it is not needed to make reference to another section.

- **European Community:** The reference to point 5.4.2. should be replaced by reference to 4.5.2.

  The first two sentences of this section should be replaced by the following.

  "*Feed and feed ingredients should ~~only~~ be **produced**, marketed, used and **stored under hygienic conditions**. They should only be **produced**, marketed, used or **stored** if they are safe and wholesome and do not **pose** a danger to animal and human health or the environment.*

  *In particular, feeds and feed ingredients contaminated with undesirable substances **or pathogen microbes** in excess of established national or international maximum levels should not be marketed or used..*"

- **ICFMH/IUMS:** See comments under 4.1 "Feed ingredients". The same apply.

  The words "safe and wholesome" are used. This has in the Codex general standard for food hygiene been replaced by "safety and suitability" to meet modern concepts of risk assessment and risk communication utilised in the WTO SPS Agreement, and should also be used in the present text.

  "Wholesome" is a very ill defined concept.

  OIE: Modify first sentence:

  "Feed and feed ingredients should only be marketed or used if they are safe and wholesome, and do not represent a danger to animal or human health or the environment."

5.4.3. Undesirable Substances

The presence in feed and feed ingredients of undesirable substances such as industrial and environmental contaminants, pesticides, radionuclides, persistent organic pollutants, pathogenic microbes and microbial toxins including mycotoxins should be identified, controlled and minimised. The risks of each undesirable substance to human and animal health should be assessed and such assessment may lead to setting of maximum limits for feeds and feed ingredients or the prohibition of certain materials from animal feeding.

- **Brazil:**

  *"The presence in feed and feed ingredients of **undesirable substances such as industrial an environmental** contaminants, pesticides, radionuclides, persistent organic pollutants, pathogenic microbes and microbial toxins including mycotoxins should be identified, controlled and minimized. The risks of each……"*

  Comments:

  Brazil emphasizes the necessity of elaborating specific norms for undesirable substances such as industry and environment contaminants, pesticides, radionuclides, persistent organic pollutants, pathogenic microbes and microbial toxins including mycotoxins in animal food.

- **Canada:** To ensure consistency with the intent of the code, Canada suggests that the last sentence in the first **paragraph** be modified to remove the reference to animal health as follows:

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

- **Norway:** According to the definition "pathogenic microbes" are not covered by the definition, and should therefore be deleted. Reference to OIE should be considered.

- **Switzerland:** *"4.5.3."* instead of *"5.4.3."*.

- **United States:**

  "~~5.4.3~~ 4.5.3. Undesirable Substances"

  Rationale: Strike "5.4.3" and replace with 4.5.3 to ensure consistent numbering.

  "The presence in feed and feed ingredients of undesirable substances such as industrial and environmental contaminants, mycotoxins, pesticides, radionuclides and persistent organic pollutants should be identified, controlled and minimized. The risks of each undesirable substance to human ~~and animal~~ health should be assessed and such assessment could lead to the setting of maximum limits in feeds and feed ingredients or the prohibition of certain materials from animal feeding."

  Rationale: Strike "and animal" from the second sentence. The focus of this code is consumer health and safety.

- **European Community:** The reference to point 5.4.3. should be replaced by reference to 4.5.3.

  This section should be replaced by the following:

  "*The presence in feed and feed ingredients of undesirable substances such as industrial and environmental contaminants, pesticides, radionuclides, persistent organic pollutants* ***or*** *microbial toxins, including mycotoxins, should be identified, controlled and* ***kept to levels as low as can reasonably be achieved (ALARA)****. The risks of each undesirable substance to human and animal health should be assessed,* ***which in turn*** *may lead to the setting of maximum limits for feeds and feed ingredients or the prohibition of certain materials from animal feed*."

  COMMENT:

  - According to the definition of undesirable substances, "pathogenic microbes" are not included within its scope and should therefore be excluded.
  - The ALARA principle seems appropriate here as it is widely used in food legislation.

- **IDF:** It must be emphasized that a contaminated feed ingredient must not be "diluted" by being mixed with pure parties. Contamination from e.g. mycotoxins is often not even distributed in a party of the feed ingredients, but can be found in high values in minor parties, which may lead to high levels in the end products.

  It should also be noticed that contamination of mycotoxin forming microbes/fungi could be trapped in the feed chain if the cleaning procedures of the feed chain is insufficient.

SECTION 5. INDUSTRIAL PRODUCTION OF ANIMAL FEEDINGSTUFFS

Responsibility for the production of safe and wholesome feed lies with the producer or manufacturer who should produce feeds that comply with any applicable statutory requirements. Feed and feed ingredients should not be manufactured in facilities where other incompatible operations are undertaken.

- **Canada:** Canada recommends modifying the title of this section as indicated below to promote the use of consistent terminology throughout the code.

  "Industrial Production of ***Feeds and Feed Ingredients****"*

- **Norway:** The title of this section should be amended to also include transport of animal feedingstuffs.

- **European Community:** The title of this section should be replaced by the following:

  "INDUSTRIAL PRODUCTION ***TRANSPORT AND STORAGE*** *OF ANIMAL FEEDINGSTUFFS"*.

  COMMENT: Aspects relating to transport are included in and relevant to this section, and the title should reflect this.

  Third line: The following should be added after the word "manufactured": *"or stored"*.

- **IDF:** This section is also applicable for the industrial manufacturing of feed ingredients. We therefore recommend that title be amended into:

  *''Industrial production of **feed ingredients and feeds**.''*

  As is commented above, the application of the HACCP-system in the feed chain is an indispensable to prevent unforeseen contamination sources. Therefore we propose to delete the words *''where appropriate''* in the last sentence of the second paragraph. The sentence should than read:

  ''The HACCP system, as annexed to the Codex Alimentarius "Recommended International Code of Practice - General Principles of Food Hygiene" should be followed.''

- **OIE:** Modify second sentence of first paragraph:

  "Feed and feed ingredients should not be manufactured in facilities where ~~other~~ incompatible operations are undertaken".

The producer or manufacturer should establish quality assurance systems based on the principles of Good Manufacturing Practice (GMP). The HACCP principles, as annexed to the Codex "Recommended International Code of Practice – General Principles of Food Hygiene" should be followed where appropriate".

- **Norway:** The principles for Good Manufacturing Practice (GMP), should be followed by establishing a quality assurance system. Implementation of GMP and HACCP should be compulsory at all stages excluding the primary production.

- **FEFAC:** proposes to ad the phrase "*The producer or manufacturer should be subject to a statutory approval/registration system*" to this paragraph to read: "*..The HACCP principles .....should be followed where appropriate.* ***The producer or manufacturer should be subject to a statutory approval/registration system***."

The effective implementation of GMP protocols should ensure that: Buildings and equipment used to process feed and feed ingredients are constructed in a manner that permits ease of operation, maintenance and cleaning and minimises the potential for feed contamination. Process flow within the manufacturing facility should also be designed to minimise such potential;

- **European Community:** Paragraph 1: This should be replaced by the following:

  *"1. Buildings and equipment used to process feed and feed ingredients are constructed in a manner that permits ease of operation, maintenance and cleaning and **prevent** ~~the potential for~~ feed contamination. Process flow within the manufacturing facility should also be designed to **avoid** such potential;"*

- **OIE:** Modify the first bullet of GMP:

  *"1. Buildings and equipment used to process feed and feed ingredients are constructed in a manner that permits ease of operation, maintenance and cleaning and minimizes the potential for ~~feed~~ contamination **and cross-contamination of feed**."*

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 cross-contamination;

- **Australia:** Suggests the sentence in point 2 be re-worked to *"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 cross contamination".* The reason for omitting the word fertilizer is that some renderers produce meat meal for use as both a feedingstuff and as a fertilizer.

- **IDF:** Regarding the list of conditions, we suggest in point 2 to omit the word fertilizers because some renderers produce meat meal for use as both a feeding stuff and as a fertilizer. The sentence should than be re-worded to:

  "Work and equipment areas are free of pesticides and other such materials not intended for use in feed in order to avoid the potential for cross contamination."

1. All plant personnel involved in the manufacture of feed and feed ingredients are adequately trained and aware of their role and responsibility in protecting feed and feed ingredients from contamination;

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

- **ICFMH/IUMS:** Point no 4. The use of water "of potable quality for animals" in feed manufacture is unacceptable from a public health point of view. We have at earlier stage of the draft called attention to this important issue. Water from e.g. streams, rivers or water downstream from purification plants, might very well be potable for animals, even carrying high number of zoonotic agents like "salmonella" and "campylobacter", the animal are silent excretors usually not being taken ill themselves. As the wording runs, the possibility for using such water for cleaning purposes also exists. Is cleaning, even wetcleaning as mentioned under 5, not part of "feed manufacture"? The section covers industrial production and it seems pertinent to require the water to be "of potable quality" to humans.

3. Machinery coming into contact with dry feed is dried following any wet cleaning process:

4. Condensation is minimised;

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

6. Feed processing plants, storage facilities and their immediate surroundings are kept clean and effective pest control programmes are implemented;

7. All scales and metering devices used in the manufacture of feeds are appropriate for the range of weights and volumes to be measured, and are tested regularly for accuracy;

8. All mixers used in the manufacture of feeds are appropriate for the range of weights or volumes being mixed and are capable of manufacturing suitable homogeneous mixtures and homogeneous dilutions;

9. Manufacturing strategies are used to avoid cross-contamination (for example by flushing, sequencing and physical clean-out) between batches of feed containing restricted or otherwise potentially harmful materials (such as certain animal by-product meals, certain additives). These procedures should also be used to minimise cross-contamination between medicated and non-medicated feeds. In cases where the risk linked to cross-contamination is high, completely separate production lines, and storage and transport, should be introduced;

- **European Community:** Paragraph 11: This should be replaced by the following:

  *"11. Manufacturing strategies are used to ~~avoid~~ **prevent** cross-contamination (for example by flushing, sequencing and physical clean-out) between batches of feed containing restricted or otherwise potentially harmful materials (such as certain animal by-product meals or additives). These procedures should also be used to ~~minimise~~ **prevent** cross-contamination between medicated and non-medicated feeds. In cases where the risk linked to cross-contamination is high, completely separate production lines, and storage and transport, should be introduced;"*

- **FEFAC:** proposes to insert "according to the ALARA principle" at the end of the second phrase in point 11 to read: *"These procedures should also be used to minimise cross-contamination between medicated and non-medicated feeds **in accordance with the ALARA principle**".*

FEFAC proposes to delete the last phrase in point 11 commencing "~~*In cases where the risk linked to cross-contamination is high, completely separate production lines, and storage and transport, should be introduced.*~~"

FEFAC would like to point to the fact that in many regions with low-density livestock populations, separation or dedication of production lines, transport and storage is not an economically feasible option for multi-purpose compound feed plants, due to prohibitive transport costs for the distribution of compound feed. FEFAC proposes to insert an equivalent provision in Section 6 under subsection 6.2 "Manufacturing of Feed On-Farm" in order to address the risk of cross-contamination at farm level in mixed livestock holdings.

10. Records and other information are maintained as indicated at 4.3 in this Code to include the identity and distribution of feeds so that any feed considered to pose a threat to animal or human health can be rapidly removed from the market and that animals exposed to the relevant feed can be identified;

11. The presence of undesirable substances is monitored and controlled;

- **FEFAC:** holds the view that cross-contamination may occur along the whole production chain for animal feed and indeed the production of animal products. Separation of production lines, transport and storage is only one of several risk management options in cases of cross-contamination which may present a risk to public health. FEFAC would therefore recommend to put more emphasis on source-directed measures attempting to minimise the presence of undesirable substances in feed and feed ingredients. FEFAC therefore proposes to insert the following phrase under point 13 to read: Point 13.*"The presence of undesirable substances is monitored and controlled.* ***Sourcing and manufacturing strategies are used to minimise the presence of undesirable substances in feed and feed ingredients in accordance with the ALARA principle;****"*

12. Feeds are delivered and can be used as soon as possible after manufacture. Any feed ingredients and manufactured feeds should be stored and transported in a manner which prevents deterioration and contamination;

- **Switzerland:** *"14. Feeds are delivered and ~~can~~* ***should*** *be used ...."*.

13. Processed feeds are separated from unprocessed feed ingredients, including additives, and appropriate packaging materials are used;

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

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

- **Switzerland:** *"17. Pathogen control procedures, such as heat treatment or the addition of authorised chemicals, are used where appropriate and monitored throughout the* ***feed*** *manufacturing process;"*.

16. Dry feeds and feed ingredients are kept dry in order to limit fungal and bacterial growth. Care should be taken to prevent, so far as reasonable practicable, deterioration and spoilage at all stages of handling, storage and transports of feeds;

- **Switzerland:** *"Dry feeds and feed ingredients are kept dry in order to limit fungal and bacterial growth. Care should be taken to prevent, so far as reasonable practicable, deterioration and spoilage at all stages of handling, storage and transports of feeds* ***and feed ingredients****;"*

17. 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.

- **Canada: S**uggests minor editorial changes to the GMP provisions and reorganization of this section as follows *(existing numbers are used in parenthesis as a reference only)*:

*"**5.1 Premises***

Buildings and equipment used to process feed and feed ingredients are constructed in a manner that permits ease of operation, maintenance and cleaning and minimises the potential for feed contamination. Process flow within the manufacturing facility should also be designed to minimise feed contamination; (1)

*Water used in feed manufacture meets hygienic standards and is of potable quality for animals. Conduits for water should be of **constructed from materials fit for their intended use**;* (4)

Sewage, waste and rain water is disposed of in a manner that ensures that equipment, feed and feed ingredients are not contaminated. (7)

5.2 Receiving, Storage and Transportation

*Processed feeds are **stored separately** from unprocessed feed ingredients, including feed additives, and appropriate packaging materials are used;* (15)

*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;* (2)

*The presence of undesirable substances **in feeds and feed ingredients** is monitored and controlled;* (13)

Feeds are delivered and used as soon as possible after manufacture. Any feed ingredients and manufactured feeds should be stored and transported in a manner which prevents deterioration and contamination; (14)

*Dry feeds and feed ingredients are kept dry in order to limit fungal and bacterial growth. Care should also be taken to ~~prevent, so far as reasonably practicable~~ **minimise** deterioration and spoilage at all stages of handling, storage and transport of feeds. **Condensation should also be minimised;*** (18) and (6)

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~~. (19)

5.3 Personnel Training

All plant personnel involved in the manufacture of feed and feed ingredients are adequately trained and aware of their role and responsibility in protecting feed and feed ingredients from contamination. (3)

5.4 Sanitation and Pest Control

Feed processing plants, storage facilities and their immediate surroundings are kept clean and effective pest control programmes are implemented; (8)

*Containers and equipment used for transport, storage, conveying, handling and weighing are kept clean. Cleaning programmes should **be effective and** minimise ~~the use, and therefore any remaining~~ residues of detergents and disinfectants.* (16)

5.5 Equipment Performance and Maintenance

All scales and metering devices used in the manufacture of feeds are appropriate for the range of weights and volumes to be measured, and are tested regularly for accuracy; (9)

All mixers used in the manufacture of feeds are appropriate for the range of weights or volumes being mixed and are capable of manufacturing suitable homogeneous mixtures and homogeneous dilutions. (10)

5.6 Manufacturing Controls

*Manufacturing ~~strategies~~ procedures are used to avoid cross-contamination (for example by flushing, sequencing and physical clean-out) between batches of feed containing restricted or otherwise potentially harmful materials (such as certain animal by-product meals, ~~certain additives~~ **veterinary drugs**). These procedures should also be used to minimise cross-contamination between medicated and nonmedicated feeds. In cases where the ~~risk linked to~~ **likelihood of** cross-contamination is high, completely separate production lines, and storage and transport, ~~should be introduced~~ are recommended;* (11)

*Pathogen control procedures, such as heat treatment or the addition of authorised chemicals, are used where appropriate and monitored ~~throughout~~ **at the applicable steps in** the manufacturing process;* (17)

Machinery coming into contact with dry feed is dried following any wet cleaning process. (5)

5.7 Recalls

Records and other information are maintained as indicated at 4.3 in this Code to include the identity and distribution of feeds so that any feed considered to pose a threat to ~~animal or human~~ consumer health can be rapidly removed from the market and that animals exposed to the relevant feed can be identified." (12)

- **Egypt (EOS):** Item (19) *"Waste Feed and other material …"* is not a clear definition, it is supposed to be *"**Wastes resulting from feed manufacturing and processing …**"*.

- **United States:**

"SECTION 5. INDUSTRIAL PRODUCTION OF ANIMAL FEED~~INGSTUFFS~~"

Rationale: Strike "ingstuffs" from the title to provide definition consistency.

Reorganize the following protocols into logical categories with the addition of a consistent numbering system as follows (existing numbers are used in parenthesis as a reference only and are expected to be deleted once organization is accepted):

"5.1 Premises"

"(1) 5.1.1 Buildings and equipment used to process feed and feed ingredients are constructed in a manner that permits ease of operation, maintenance and cleaning and minimises the potential for feed contamination. Process flow within the manufacturing facility should also be designed to minimise such potential;"

"(20) 5.1.2 ***Feed processing and storage facilities should be constructed and securely maintained in such a manner as needed to*** *prevent accidental* ***or intentional tampering or contamination of feed, feed*** *ingredients****, used in their manufacturing, processing, and storage****."*

Rationale: (20) Add 5.1.2 to emphasis the need to protect against attacks against the feed and food supply.

"(4) 5.1.3 Water used in feed manufacture meets hygienic standards and is of potable quality for animals. Conduits for water should be of inert nature;"

*"(7) 5.1.4 Sewage, waste and rain water is disposed of in a manner that ~~ensures~~ **minimize** that equipment, feed and feed ingredients are not contaminated;"*

Rationale: (7) Strike "ensure" and replace with "minimize" since ensure is considered a definite guarantee that is difficult to adhere to in this case.

"(15) 5.1.5 Processed feeds are separated from unprocessed feed ingredients, ~~including additives~~, and appropriate packaging materials are used;"

Rationale: (15) Strike "Processed feeds are separated from unprocessed feed ingredients, including additives, and appropriate packaging materials are used" since it is irrelevant to consumer food safety.

"5.2 Receiving, Storage and Transport"

*"(2) 5.2.1 Work and equipment areas are free of fertilizers, pesticides, **treated seed** and other such materials not intended for use in feed in order to avoid the potential for cross-contamination."*

Rationale: (2) Add "treated seed" to make this section consistent with section 6.2.2

"(13) 5.2.2 The presence of undesirable substances is monitored and controlled;"

"(14) 5.2.3 Feeds are delivered and ~~can be~~ used as soon as possible after manufacture. Any feed ingredients and manufactured feeds should be stored and transported in a manner, which prevents deterioration and contamination;"

Rationale: (14) Strike "can be" to strengthen intention of sentence.

"(18) 5.2.4 Dry feeds and feed ingredients are kept dry in order to limit fungal and bacterial growth. Care should also be taken to prevent, so far as reasonably practicable, deterioration and spoilage at all stages of handling, storage and transport of feeds;"

*"(19) 5.2.5 Waste feed and other material containing **potentially** 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~~."*

Rationale: (19) Add "potentially" to clarify that hazardous materials may be unknown in waste feed and other material.

"5.3 Personnel Training"

"(3) 5.3.1 All plant personnel involved in the manufacture of feed and feed ingredients are adequately trained and aware of their role and responsibility in protecting feed and feed ingredients from contamination;"

"5.4 Sanitation and Pest Control"

"(8) 5.4.1 Feed processing plants, storage facilities and their immediate surroundings are kept clean and effective pest control programmes are implemented;"

"(16) 5.4.2 Containers and equipment used for transport, storage, conveying, handling and weighing are kept clean. Cleaning programmes should be effective and minimize ~~the use, and therefore any remaining~~ residues of detergents and disinfectants;"

Rationale: (16) Strike "the use, and therefore any remaining" since it is not necessary to the meaning of the sentence.

"(5) 5.4.3 Machinery coming into contact with dry feed is dried following any wet cleaning process;"

~~"(6) 5.4.4 Condensation is minimised;"~~

Rationale: (6) Strike "Condensation is minimised" protocol since the concept of keeping ingredients and feeds dry is already covered in point #18 of the draft.

"5.5 Equipment Performance and Maintenance"

"(9) 5.5.1 All scales and metering devices used in the manufacture of feeds are appropriate for the range of weights and volumes to be measures, and are tested regularly for accuracy;"

"(10) 5.5.2 All mixers used in the manufacture of feeds are appropriate for the range of weights or volumes being mixed and are capable of manufacturing suitable homogeneous mixtures and homogeneous dilutions;"

"5.6 Manufacturing Controls"

*"(11) 5.6.1 Manufacturing strategies are used to avoid cross-contamination (for example by flushing, sequencing and physical clean-out) between batches of feed containing restricted or otherwise potentially harmful materials (such as certain animal by-product meals, certain ~~additives~~ **feed ingredients**). These procedures should also be used to minimize cross-contamination between medicated and nonmedicated feeds. In cases where the risk linked*

to cross contamination is high, completely separate production lines, and storage and transport, should be introduced;"

Rational: (11) Strike "additives" and replace with "feed ingredients" to keep consistent with proposed definitions in first sentence.

"(17) 5.6.2 Pathogen control procedures, such as heat treatment or the addition of authorised chemicals, are used where appropriate and monitored ~~throughout the manufacturing process~~;"

Rationale: (17) Strike "through out the manufacturing process" as it is not needed to check heat treatment beyond the heating process.

"Recalls

(12) 5.7.1 Records and other information are maintained as indicated at 4.3 Traceability and Record Keeping section in this Code to include the identity and distribution of feeds so that any feed considered to pose a threat to animal or human health can be rapidly removed from the market and that animals exposed to the relevant feed can be identified;"

- **European Community:** A new paragraph should be added after paragraph 19:

  "20.- Feed processing plants, storage facilities, and means of transport must be cleaned and disinfected as often as necessary to avoid the presence of insects and rodents."

SECTION 7. METHODS OF ANALYSIS AND SAMPLING

7.1. Sampling

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. It is important to ensure that the sample taken is representative of the consignment of the lot.[7]

- **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."

- **European Community:** The entire section should be replaced by the following:

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

  *Footnote: **** "Working Group draft has been modified by the Codex Secretariat to delete references to regional organisations."*

  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.

[7] Working Group draft has been modified by the Codex Secretariat to delete references to regional organizations.

7.2. Analysis

Where samples are selected for analysis, standard methods of analysis or methods validated through appropriate protocols should be used. Official methods of analysis elaborated by international organisations should be used. These include the ISO 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 which are applicable for routine use, and of reliability.[6]

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

- **Egypt (EOS):** It is much better to delete the word *"~~Official~~"* in the last sentence, and the proposed sentence is: *"Analysis should be conducted in officially accredited laboratories, and which employ GMP"*, this deletion will encourage the official labs to ensure quality assurance and accreditation programs, besides avoiding and/or minimizing the unconfirmed data and results.

- **European Community:** The entire section should be replaced by the following:

  "*7.2. 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* ~~*international organisations*~~ *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 which are applicable for routine use, and of reliability.* ***Analyses should be carried out in official or officially accredited laboratories which employ Good Laboratory Practice****.*"

  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.