

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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Agenda Item 5 (b)

CX/AF 02/7  
May 2002

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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

#### Third Session

Copenhagen, Denmark, 17 - 20 June 2002

### CONSIDERATION AT STEP 4

#### SECTION 6 "ON-FARM PRODUCTION AND USE OF FEEDINGSTUFFS" (of the proposed draft Code of Practice on Good Animal Feeding)

#### COMMENTS FROM GOVERNMENTS AND INTERESTED ORGANIZATIONS AT STEP 3 (in response to CL 2001/37-AF)

The present document contains the text of the Section 6 "On-farm Production and Use of Feedingstuffs" 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 2001/37-AF requesting proposals on the section. The text of section 6 "On Farm Production and Use of Feedingstuffs" of the Proposed Draft Code of Practice on Good Animal Feeding 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, 12<sup>th</sup> Edition, pages 21-23

Comments submitted by : **Argentina, Brazil, Canada, Malaysia, New Zealand, Norway, Poland, Switzerland, Turkey**, the **United States**, the **European Commission**, the **European Feed Manufacturers Federation (FEFAC)**, the **International Dairy Federation (IDF)**, the **International Office of Epizootics (OIE)**, and the **International Union of Microbiological Societies/International Committee on Food Microbiology and Hygiene (ICFMH/IUMS)**.

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**COMMENTS FROM GOVERNMENTS AND INTERESTED ORGANISATIONS  
ON THE REVISED SECTION 6 “ON-FARM PRODUCTION AND USE OF FEEDINGSTUFFS” OF  
THE PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING<sup>1</sup>**

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**GENERAL COMMENTS**

**CANADA**

In keeping with the objective of the Task Force, the purpose of the Codex Alimentarius Commission and the conclusions from the 1<sup>st</sup> and 2<sup>nd</sup> Sessions, Canada requests those general references to animal health and the environment be removed from this Section of the Code of Practice. Further, to ensure that the code remains true to the mandate of Codex, we believe that it is necessary to ensure that each of the proposed production practices contributes to the protection of consumer health. In the event that we are not able to identify linkages between the contaminants’ presence in the feed and a risk to consumer health, it should not be included in the code.

Many of the requirements listed in Section 6.2 Manufacturing of Feed On-Farm are those that would also be necessary for the manufacturing of feed for sale. It may be preferable to modify Section 5 of the code so that it applies generically to all feed manufacturers, whether the feed is manufactured industrially for sale or on farm (not intended for sale) and have a separate section that lists the additional requirements for industrial production of feed rather than duplicating these requirements in two separate sections of the code.

Canada believes that it is necessary to use consistent terminology throughout the code, e.g., we have defined feed and feed ingredient and these terms should be used rather than feedingstuff throughout the document.

**MALAYSIA**

Malaysia in general agrees on the Proposed Draft Code of Practice on Good Animal Feeding (including Section 6 of the Code).

**NEW ZEALAND**

New Zealand considers that this section is out of proportion to the bulk of the draft Code in terms of scope, depth and detail. New Zealand is concerned that this section is overly prescriptive which is against the decision of Codex to move towards developing more outcome based standards. New Zealand therefore considers the section needs to be revised so as to complement the Code, not to dominate it.

New Zealand also suggests that the purpose, scope and vocabulary of this section fails to distinguish on-farm risks under various systems from general systematic problems (e.g., irrigation water, farm environments) which are usually beyond local control.

New Zealand suggests that this section should distinguish between:

- Farm enterprises that bring in all or some manufactured feeds and/or transported fodders;
- Farm enterprises that produce feed ingredients for further manufacture or use elsewhere;
- Farm enterprises where feeds are made up on-farm using on-farm or imported ingredients or where there is on-farm fodder production; and
- Farms which do not use imported feeds at all such as pastoral/grazing systems, intensive grazing, extensive farming, peasant husbandry and nomadic practices.

The risks in each of these four farming enterprises is different and should be taken in risk order taking account of different risk and exposure profiles. By combining all these farm types and attempting to find common requirements for risk management across all, the requirements appear to be excessive to the risks presented by each farm type.

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<sup>1</sup> *How to read this document:*

The text of the Code is placed in boxes
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**COUNTRY / ORGANISATION:**

Comments immediately follow the previous text.

New Zealand believes that as currently drafted, compliance with this section for both least developed and developing countries will be a problem. Compliance may also be problematic for some developed countries.

#### **NORWAY**

Norway generally supports the comprehensive proposal made by the drafting group chaired by Australia. The introduction declares that this section also includes aquaculture. As the aquaculture production includes a wide range of management-systems some adjustments of the text is necessary.

GMP should also apply at all stages of on-farm production. HACCP should be implemented where appropriate.

#### **POLAND**

Having regard to safety of foodstuffs, HACCP and other alternative testing relating to feeding stuffs should be stronger underlined. HACCP for small farms should also be taken into account. These procedures would minimize or eliminate undesirable substances in feedingstuffs.

#### **TURKEY**

The proposed Draft Code of Practice on Good Animal Feeding is overall understandable and practical (CL 2001/36-AF).

It is thought that Section 6 of this Code “On-Farm Production and Use of Feedingstuffs” is logical and reasonable in terms of good animal feeding but not practical yet in Turkey for the following reasons: It will take time to implement section 6.

- a) Legislative deficiency of Pasture Management: Almost all pasture lands belong to government. Their usage and management are under provincial administration and not well designed. Only small number of Farmers have their own pasture lands which are no big enough to apply rotational grazing.
- b) Farmers’ Knowledge: Farmers are not well educated to apply the rules of section 6 on their on lands.
- c) THA Structure of Animal Husbandry: THA structure of many farms is like a small animal unit and they are quite scattered. Therefore it is hard to register and control them.
- d) Insufficient Feed Sources and Technological Deficiency: Although farmers are willing to realise good agricultural practice, most farmers have not been able to apply it because they don’t have modern agricultural tools. On the other hand, because of limited feed sources, particularly insufficient forage sources, farmers don’t pay attention of feed quality and they use any kinds of feeds to feed their animals.

#### **UNITED STATES**

The United States appreciates the opportunity to comment on CL 2000/37 AF, dated November 2001, Request for Comments on Section 6 of the Proposed Draft Code of Practice on Good Animal Feeding :”On-Farm Production and Use of Feedingsstuffs.”

The United States has reviewed the Proposed Draft Code of Practice on Good Animal Feeding “On-Farm Production and us of Feedingstuffs, CL 2001/37-AF and would like to make the following suggestions for amending the document.

#### **EUROPEAN COMMUNITY**

The European Community would like to thank the drafting group led by Australia for the presentation of this draft for section 6. The draft contains very detailed rules for on-farm production and in many cases takes environmental implications into consideration.

#### **INTERNATIONAL DAIRY FEDERATION (IDF)**

The new Section 6 of the code on “On-farm production and the use of feeding stuffs” is a valuable extension of the code and the efforts of the group which made the first draft is very much appreciated.

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

#### 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.

#### **INTERNATIONAL UNION OF MICROBIOLOGICAL SOCIETIES/INTERNATIONAL COMMITTEE ON FOOD MICROBIOLOGY AND HYGIENE (ICFMH/IUMS)**

One of the most important food safety and public health aspects of feeds, the use of mouldy feeds, whether grain cereals or e.g. mouldy silage containing mycotoxins, is very poorly handled in **Section 6**. Reference to GAP and GNP is made but that seems to be all. This important issue needs to be addressed directly. Mouldy feed *is mentioned* but only in the context of left over feed when feeding the animals (6.3.3.2 Hygiene, paragraph 4).

#### **INTERNATIONAL OFFICE OF EPIZOOTICS - OIE**

This section is overly prescriptive, it should be redrafted as to be outcomes-based. In terms of risks, this form of production should pose less risks to human health and therefore the recommendations should be adjusted accordingly.

Furthermore, recommendations in this section as made as if “on-farm production” were just one. There are many different conditions, from those using strictly pastoral and grazing, to the more elaborate manufacturers of feed. The recommendations should address these different conditions and levels of risk separately.

OIE is willing to work with new drafting team on this section and reserves specific comments on the text for that time.

**SPECIFIC COMMENTS****SECTION 6 - ON-FARM PRODUCTION AND USE OF FEEDINGSTUFFS**

This section applies to farm level production, procurement, handling, storage, processing and distribution of feed and feed ingredients, and the proper use of feedingstuffs for food producing animals, including aquatic animals.

On-farm manufacturing of feedingstuffs should follow the same principles as industrial feed production and adherence to Good Manufacturing Practice (GMP). Where possible, GMP is encouraged during all stages of on-farm manufacturing of animal feed for food producing animals, to help ensure the safety of animal origin food for human consumption. Three types of contamination represent hazards at most stages of on-farm production of feeds, namely;

**biological**, such as bacteria, fungi and other microbial pathogens,

**chemical**, such as residues of, medication, pesticides, fertilizer or other agricultural substances,

**physical**, such as broken needles, machinery and other foreign material.

**COMMENTS:****BRAZIL**

Brazil suggests following modification:

“  **chemical**, such as residues of, medication, pesticides and fertilizer and other ~~agricultural~~ substances “

**CANADA**

Canada recommends modifying the title of this section as indicated above to promote the use of consistent terminology throughout the code.

Canada suggests minor rewording of this section which includes the uniform use of terminology. The reference to physical contamination should be removed unless a specific link can be made between consumer health and the contamination of feeds with broken needles, machinery and other foreign material.

*This section applies to farm level production, procurement, handling, storage, processing and distribution of feeds and feed ingredients, and their proper use for food producing animals, including aquatic animals. On-farm manufacturing of feeds should follow the same principles as industrial feed production as outlined in Section 5 of this code including adherence to Good Manufacturing Practices (GMP). Where possible, GMP is encouraged during all stages of on-farm manufacturing of animal feed for food producing animals, to help ensure the safety of foods of animal origin. Two types of contamination represent hazards at most stages of on-farm production of feeds, namely:*

- *biological, such as bacteria, fungi and other microbial pathogens; and*
- *chemical, such as residues of, medication, pesticides, fertilizer or other agricultural chemicals.*

**SWITZERLAND**

- **chemical**, such as residues of medication, pesticides, fertilizer or other [delete *agricultural*] substances

- **physical**, such as ... and other foreign effects. [Radioactivity has also to be considered]

**UNITED STATES**

Modify Section 6 to read as follows:

*This section applies to the production, processing, manufacturing, distribution, storage, and use of feeds and feed ingredients on livestock and aquatic animal farms (on-farm). Its purpose is to help ensure that feeds and feed ingredients are produced, manufactured, stored, transported and used on-farm in ways that minimize the risk of the feedingstuffs becoming sources of biological, chemical and physical hazards to livestock and humans. The hazards of concern include the following:*

- *biological, such as bacteria, fungi and other microbial pathogens,*
- *chemical, such as residues of medications, pesticides, fertilizers or other agricultural chemicals,*

- *physical, such as broken needles, machinery parts and other foreign material.*

**Rational:** The wording used in the proposed modification is clearer and more concise.

#### EUROPEAN COMMUNITY

**First paragraph, first line:** The following should be inserted after the words “*applies to*”  
“*grazing or free-range feeding, forage crop production and to*”

**Second paragraph, second line:** The words “*where possible*” should be deleted.

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

#### INTERNATIONAL UNION OF MICROBIOLOGICAL SOCIETIES/INTERNATIONAL COMMITTEE ON FOOD MICROBIOLOGY AND HYGIENE (ICFMH/IUMS)

**Physical**, such as broken needles. Does this refer to injections using syringes? If this is the case, it has no relation to feeds. Which kind of broken needles is meant? Explanation is needed to avoid misunderstanding.

#### 6.1 AGRICULTURAL PRODUCTION OF FEED

##### 6.1.1 Production of pastures, cereal grain and forage crops

Adherence to Good Agricultural Practice (GAP) is encouraged in the production of natural, improved and cultivated pastures, forage and cereal grain crops used as feed or feed ingredients for food producing animals. Following GAP standards will minimise the risk of biological, chemical and physical contaminants entering the food chain. If non-food crop residuals and stubbles are grazed after harvest, or otherwise enter the food-chain, they should also be managed as livestock feed. Most livestock will consume a portion of their bedding and crops that produce bedding material should also be managed as a livestock feed. Good pasture management practices, such as rotational grazing and dispersion of manure droppings, should be used to reduce biological cross-contamination between groups of animals. On farm feed needs to be properly conserved to avoid the occurrence of rodent filth and pathogen cycling.

#### **COMMENTS:**

##### NORWAY

The term “livestock” should be replaced by the term “animal” which is more general and covers all food producing species.

##### UNITED STATES

Modify the title of Section 6.1 to read as follows:

6.1 *PRODUCTION OF FEEDS ON-FARM*

6.1.1 *Production of pastures, cereal grain and forage crops*

##### CANADA

As per our comment regarding the introduction, Canada suggests deleting the reference to physical contaminants in the second sentence and adding the words “via feeds and feed ingredients” to the end of the sentence. The sentence would read as follows:

*Following GAP standards will minimise the risk of biological and chemical contaminants entering the food chain via feeds and feed ingredients.*

##### SWITZERLAND

1<sup>st</sup> line: *Good Agricultural Practice* needs a definition or a reference.

2<sup>nd</sup> line: ..., forage and cereal grain and other crops used as ...

**UNITED STATES**

Modify Section 6.1.1 to read as follows:

*6.1.1. Production of pastures, forages, and cereal grains*

*Adherence to Good Agricultural Practice (GAP) is encouraged in the production of all types of pastures, forages and cereal grains that are intended for use as, or in feed, bedding or litter. Following GAP standards will minimize the risk of pastures, forages, and cereal grains becoming vehicles of transmission or conveyance of biological, chemical, and physical contaminants to livestock and humans. The practice should include good cultivation and pasture management practices like crop rotation, rotational grazing and others that reduce the chances of cross-contamination between groups of animals.*

Rational: The wording used in the proposed modification is clearer and more concise.

**EUROPEAN COMMUNITY**

The second sentence should be replaced by the following:

*“By adhering to GAP standards, the risk of biological, chemical and physical contaminants entering the food chain will be kept to levels as low as can reasonably be achieved. If non-food crop residues and stubbles are grazed after harvest, or otherwise enter the food-chain, they should also be managed as animal feed.”*

The word “livestock” should be replaced by “animal” (in this as well as other points).

COMMENT: This code applies to all animals, including fish. The term “animal” is more general and covers all possible species.

In the ninth line, the word “droppings” should be deleted.

In the final sentence, the word “conserved” should be replaced by “stored”.

**INTERNATIONAL DAIRY FEDERATION (IDF)**

The general understanding is that the guidelines for the application HACCP-principles, as provided in the Annex to the Codex Alimentarius Recommended International Code of Practice - General Principles of Food Hygiene (Annex to CAC/RCP 1-1969, Rev.3 (1997) are applicable to medium and large-scale businesses. They may not be suitable for application at small business and dairy farms.. However, the systematic stepwise approach of the HACCP *principles* is very suitable to assess the hazards of a primary production process and to establish corrective actions and control measures. Starting point in this procedure is a description of the product and a flow diagram of the operation, which is representative for the sector as a whole. This can be accomplished by a multidisciplinary team, which includes experts and farmers. The results could be incorporated in a code of GAP.

Therefore we propose to edit this paragraph as follows:

“Adherence to codes of Good Agricultural Practice (GAP) should be encouraged in the production and on farm processing and storage of crops used as feed and feed ingredients for food producing animals. In these codes corrective actions and control measures could be incorporated which are established on the basis of a hazard assessment of a representative production process by following established HACCP principles. The GAP standards, which are thus developed, would 1 minimise the risk of biological, chemical and physical contaminants entering the food chain. If non-food crops ....etc.”

**INTERNATIONAL UNION OF MICROBIOLOGICAL SOCIETIES/INTERNATIONAL COMMITTEE ON FOOD MICROBIOLOGY AND HYGIENE (ICFMH/IUMS)**

The incorporation of bedding materials to be managed as livestock feed is very sound proposal.

**6.1.1.1 Manure Fertilizer**

Where manure fertilisation of crops on pastures is practised, an appropriate manure handling and storage system should be in place and maintained to minimise environmental contamination, particularly to ground water and waterways through run-off. There should be adequate time between applying the manure and grazing, to allow the manure to decompose and to minimise biological contamination. Similarly, manure applied to ponds to enhance productivity should be composted for an adequate period prior to use to attenuate human pathogens.

The systems must comply with any local regulatory requirements in place. Manure, compost and other plant nutrients should be properly used and applied to croplands, pastures and ponds to minimise biological and chemical contamination of crops and the environment.

The source and safety of manure or sludge sourced off-farm should be assured of quality by appropriate means.

## **COMMENTS:**

### **CANADA**

Canada suggests that the first sentence of this section be deleted as the impact of environmental contamination of ground water caused by improper manure fertilization on the health of consumers of animal products is not clearly established. As indicated in our general comments, if there is no clearly established linkage between the hazard being controlled by the recommended production practice and consumer health, they are outside the mandate of the Task Force and Codex and should not be included in the code.

The reference to the environment should also be deleted from the second sentence of the second paragraph for the same reason.

### **NORWAY**

- The use of manure to enhance productivity on ponds needs further explanation.
- Particular consideration should be given to the presence of metals, including those found in animal manure, where trace and other metals are not biologically available to animals.

### **SWITZERLAND**

The use of sewage sludge as a fertilizer should be regulated.

### **UNITED STATES**

Modify Section 6.1.1.1 to read as follows:

*Steps should be taken to prevent manure-fertilized pastures, forages or croplands from becoming sources of biological or chemical contamination of crops grown on the lands. Steps should also be taken to ensure that run-off from fertilized lands does not contaminate surface or underground waterways. The steps should include the establishment and use of appropriate manure handling, curing (composting), storage and application systems, and the allowance for an adequate length of time between application of manure and the initiation of grazing. Similarly, manure applied to ponds to enhance productivity should be composted for an adequate period prior to use to attenuate human pathogens.*

*The systems must also comply with local regulatory requirements designed to ensure the safe use of manure.*

*Where the quantity of manure generated on-farm is not enough to satisfy the demand for its use as a fertilizer, steps should be taken to ensure that any needed extra manure is obtained or purchased off-farm only from a reliable source with a quality product.*

Rational: The wording used in the proposed modification is clearer and more concise.

### **EUROPEAN COMMUNITY**

In the second paragraph: the word “*pond*” requires further explanation. The significance of this paragraph is unclear.

The following should be inserted after the third paragraph:

*“Particular consideration should be given to the presence of metals, including those found in animal manure, where trace and other metals are not biologically available to the animals”.*

The word “*sourced*” should be replaced by “*on- or*”.



### 6.1.1.2 Chemical Fertilizers

Appropriate handling, storage and application systems should be in place and maintained to minimise environmental contamination, particularly to ground water and waterways through run-off and drift during application. The systems must comply with any local regulatory requirements in place.

#### COMMENTS:

##### CANADA

While these agricultural practices are laudable, the reference to environmental contamination does not clearly demonstrate how these contaminants could become incorporated in feed so as to present a risk to consumer health from the consumption of foods of animal origin. A linkage could be made to inadvertent contamination of crops or water to be used in the production of feed.

##### UNITED STATES

Modify Section 6.1.1.2 to read as follows:

*Appropriate handling, storage, and application systems for chemical fertilizers should be in place and maintained to minimize environmental contamination, particularly to surface and underground waterways through run-off or drift during application. The system must comply with local regulatory requirements designed to ensure the safe use of chemical fertilizers.*

Rational: The wording used in the proposed modification is clearer and more concise.

##### EUROPEAN COMMUNITY

The following should be added as the first paragraph:

*“Fertilisers should be obtained from reputable suppliers and should be stored safely and separately from animal feed and water used for watering animals.”*

### 6.1.1.3 Agricultural Chemicals

Where possible, agricultural chemicals should be obtained from reputable suppliers who follow HACCP principles in the manufacture of their products. If regulatory system is in place, then those chemical used must be registered with that agency

Agricultural chemicals should be stored safely in clearly labelled, secure containers in clean, dry areas separate from other inputs and livestock feed. Herbicides, pesticides, fertilizers and other agricultural chemicals should be used for the purpose indicated, applied at the rates, frequencies and in the manner indicated in the instructions for use. Records of the application should be maintained, including the name and content of the chemical used, when and how they were applied.

Withholding periods for harvesting, stocking, feeding or grazing should be strictly observed.

Chemicals should be disposed of responsibly in a manner that will not lead to contamination of any water body, soil, feed or feed ingredients.

#### COMMENTS:

##### CANADA

Canada recommends providing a list of examples in the first sentence of the second paragraph in this section to better define what is meant by the term “inputs” as follows:

*Agricultural chemicals should be stored safely in clearly labelled, ... other inputs (e.g., herbicides, pesticides, fertilizers) and livestock feed.*

##### SWITZERLAND

Delete *When possible ...* at the beginning of the 1<sup>st</sup> sentence.

**UNITED STATES**

Modify Section 6.1.1.3 to read as follows:

*Where possible, agricultural chemicals other than fertilizers should be obtained from reputable suppliers who follow HACCP principles in the manufacture of their products. If regulatory system is in place, only chemicals registered with the appropriate regulatory agency should be used.*

*Agricultural chemicals should be stored safely in clearly labelled, secure containers in clean, dry areas separate from feeds, fertilizers and other inputs. Herbicides, pesticides and other agricultural chemicals should only be used for the purposes indicated, and applied at the rates, frequency and manner indicated in the instructions for use. Records of the application should be maintained, and should include the name of the chemicals, the amounts used, and the date and mode of application.*

*Withholding periods for harvesting, stocking, feeding, or grazing should be strictly observed.*

*Chemicals should be disposed of in a manner that will not lead to contamination of any water body, soil, feed, or feed ingredients.*

Rational: The wording used in the proposed modification is clearer and more concise.

**EUROPEAN COMMUNITY**

The first sentence should be replaced by: *Agricultural chemicals should be obtained from reputable suppliers.*

COMMENT: This requirement is outside the scope of this code.

**EUROPEAN FEED MANUFACTURERS FEDERATION (FEFAC)**

FEFAC proposes to insert "... and their containers..." in the last phrase of 6.1.1.3 to read :

"Chemicals *and their containers* should be disposed of responsibly in a manner that will not lead to contamination of any water body, soil, feed or feed ingredients."

**6.1.1.4 Site Selection and water use**

Land used for production of livestock feeds should not be located in a proximity to industrial operations where industrial pollutants from air or ground water would be expected to contaminate the pastures, harvested crops or crop residuals. Runoff from adjacent land and irrigation water should be free of any biological or chemical contaminants that may present a risk to food safety.

**COMMENTS:****NORWAY**

The first sentence should start with "Land and water used for production of animal feeds--," to include seaweed and other aquatic organisms used as feed.

**SWITZERLAND**

Delete 1<sup>st</sup> sentence! Industrial pollutants have to be reduced so that livestock production not necessarily has to move.

**UNITED STATES**

See comments for Section 6.2

**EUROPEAN COMMUNITY**

In the first line, the words "*and water*" should be added after "*land*", and the words "*high density traffic motorways or to*" should be added after "*proximity to*".

COMMENT: Some feedingstuffs, such as seaweed, are produced in water.

### 6.1.2 Water

Water for irrigation should not contain any biological or chemical contaminants that have the potential to be ingested in significant quantities by animals that consume the products of the irrigation.

#### COMMENTS:

##### NORWAY

The introduction should be amended to “Water for irrigation and aquaculture should not contain any biological or chemical contaminants --,”. By the end “- or by fish” should be added.

##### SWITZERLAND

Water for irrigation should not contain any biological, chemical *or physical* [e.g. radioactivity] contaminants that have the potential to be ingested in significant *quantities* by ....

##### UNITED STATES

Modify and renumber section 6.1.1.4 and section 6.1.2 ; add section 6.1.4 as follows:

##### 6.1.2 *Water for irrigation (old 6.1.2)*

*Water used to irrigate pastures, forages and croplands should not contain any biological or chemical contamination that could be transferred to livestock grazing on, or ingesting crops grown on the irrigated lands.*

##### 6.1.3 *Site selection*

*Lands used for rearing livestock and producing feeds for those livestock should not be located in the proximity of industrial operations where air and water-borne industrial pollutants could contaminate pastures, forages, and crops grown on the lands. The slope of the land should not favor the accumulation of run-offs from adjacent lands.*

##### 6.1.4 *Harvesting and storage*

*Hay, grains and other crops produced on-farm should be harvested and stored for future use in ways that minimize the accumulation of physical contaminants, limit access to rodents, and prevent the proliferation of molds and other pathogenic microbes. Seeds intended for use in producing the next generation of crops should be stored separately and preserved, as needed, only with chemicals approved for that purpose.*

Rational: The wording and the organization used in the proposed modification are clearer and more concise. In our view the harvesting and storage of crops needed to be addressed.

##### EUROPEAN COMMUNITY

This section should be amended to read as follows:

*“Water for irrigation and aquaculture should not contain any biological or chemical contaminants that have the potential to be ingested in significant quantities by animals that consume the products of the irrigation or by aquaculture animals.*

##### INTERNATIONAL UNION OF MICROBIOLOGICAL SOCIETIES/INTERNATIONAL COMMITTEE ON FOOD MICROBIOLOGY AND HYGIENE (ICFMH/IUMS)

This is far better formulated than in **section 5**<sup>2</sup>, and similar words might be adapted in that section. Many countries, e.g. Denmark, have legislation covering this aspect. Why not add the use of water containing biological or chemical contaminants agents should conform with local regulationsto strengthen up the food safety aspects of text somewhat.

<sup>2</sup> See relevant comment in CX/AF 02/4

## 6.2 MANUFACTURING OF FEED ON-FARM

### 6.2.1 Production

On-farm mixing or production of feedingstuffs should be conducted in accordance with HACCP or GMP principles.

As HACCP principles have been scientifically demonstrated, farmers may have the option to follow GMP or HACCP principles.

#### COMMENTS:

##### **BRAZIL**

Brazil suggests following modification:

“ On-farm mixing or production of feedingstuffs should be conducted in accordance with ~~HACCP or GMP~~ GMP or HACCP principles.””

Brazil suggests adding the following sub-sections:

##### **Buildings and Grounds**

Buildings used for production shall provide adequate space for equipment, processing and storage. Areas shall include access for routine maintenance and cleaning of equipment as well as, medicated feeds should be stored in specific areas. Buildings are to be constructed and maintained in a manner to minimize pest infestation and birds access.

##### **Equipment**

Should be capable of producing normal and medicated feed of intended potency and maintained in ordered and clean way. Scales, metering devices, grinders, mixers shall be accurate and of suitable size, design and precision for the intended purposes. All equipment shall be installed and maintained to facilitate inspection and clean-out procedure.

##### **Working area**

Agri-chemicals (e.g. pesticides, rodenticides, herbicides, fungicides, fertilizers, insecticides) not intended to use in feed manufacturing should be stored in a separated area. An area for additives and drugs intended for use in the feed should be available. Working area and equipment for feed manufacturing and storage is to be available.

##### **CANADA**

Canada recommends the removal of the second sentence as the first sentence adequately addresses this subject.

##### **NORWAY**

The title should be changed to “Manufacturing”.

In the text it should be more clearly stated that production on farm should be conducted in line with the principles of GMP. HACCP should be followed where appropriate, according to the code already established for “Food hygiene”.

##### **SWITZERLAND**

GMP and/or HACCP procedures will be very difficult to fulfil in various countries, not only in developing countries.

##### **UNITED STATES**

Modify Section 6.2.1 to read as follows:

*On-farm mixing or production of feeds should be conducted in accordance with HACCP or GMP principles.*

Rational: The concept of the second sentence is covered in the first sentence and the second sentence is not clear in its meaning. GMP’s may be technically more appropriate for on-farm feed mills than HACCP.

**EUROPEAN COMMUNITY**

The title should be changed to:

*“6.2.1 Manufacturing”*

COMMENT: Issues relating to feed production are already set out in 6.1.

Both paragraphs in this section should be replaced by:

*“On-farm mixing or manufacturing of feedingstuffs, including preservation, should be conducted in line with 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”.*

**EUROPEAN FEED MANUFACTURERS FEDERATION (FEFAC)**

FEFAC proposes to insert a new paragraph in order to establish equivalency between section 5 (point 11) and 6 on the issue of cross-contamination to read :

Last phrase (new) : *Farmers should use mixing or production strategies to avoid cross-contamination between batches of feed containing restricted or otherwise harmful materials (certain animal meal by-products, certain additives or veterinary drugs). [In case where the risk linked to cross-contamination is high, farmers should separate feed mixing and handling equipment, storage, housing and transport ].*

**INTERNATIONAL DAIRY FEDERATION (IDF)**

As pointed out before, the guidelines for the application HACCP-system of the Codex Alimentarius may not be suitable for small businesses and farms. However the application of the HACCP *principles* is very useful to develop codes of good practice for the manufacturing of feeds on the farm. This can be accomplished in the same way as is proposed under section 6.1.1.

Therefore we propose to edit this paragraph as follows:

*“On-farm mixing or production of feeding stuffs should be conducted in accordance with GMP-codes.*

*In these codes corrective actions and control measures should be incorporated which are established on the basis of a hazard assessment of a representative production process by following established HACCP principles.”*

**6.2.2 Ingredients**

Feed ingredients produced on the farm should be produced in accordance with good agricultural practice (subsection 6.1).

Sowing seed treated by chemicals other than approved grain protectorants should not be used.

Feed ingredients from off the farm should be sourced from reputable suppliers and should be inspected at delivery to detect any contaminants that may present a risk to food safety. Rejected feed ingredients should be clearly identified and promptly returned to the supplier.

Waste and contaminated or spoiled materials should be safely disposed of to avoid contamination of the feed and feed ingredients, water supply and other feed sources.

Only approved/registered veterinary chemicals and feed additives should be used.

**COMMENTS:****BRAZIL**

Brazil suggests adding the following sub-sections:

**Lab analysis**

All ingredients should be inspected periodically to evaluate their quality. This may include sensorial (visual inspection, color, odor, particle size) and proximate analysis. Medicated feed, as well additives included in the formulae shall contain identity, concentration, purity and intended using level according to labelling directions. Adequate procedures shall be established to avoid cross contamination of feeds (sequencing of production, flushing, physical cleanout) between medicated and non-medicated feeds.

**Labels**

Feed ingredients should be labeled, handled and stored in a manner that prevents label mix-up and assures that the correct ingredients/labels are used to the medicated feed. Feed mix should be delivered to specific storage bins immediately after mixing in order to avoid mistaken of phases feeding. Feed on bags shall be identified with a code by phase according to a master formula recorded on the files.

**CANADA**

Neither waste nor contaminated feed ingredients have been defined. The Task Force had agreed, at the 2<sup>nd</sup> Session, not to use the term “waste” in the code without a definition. Further, depending on the definition of these products there may be situations when they might be safely used as feed ingredients at a low inclusion rate without any adverse effect on consumer health, e.g., grains containing mycotoxins. This concept is recognized in Section 5.4.3 of CL 2001/36-AF. Accordingly, Canada suggests a rewording of this sentence as follows:

*Where supported by an assessment of the risk to consumer health, contaminated feed ingredients can be safely used at acceptable levels in feed. Otherwise, they should be disposed of in a manner to avoid contamination of other feeds and feed ingredients or the water supply.*

**SWITZERLAND**

3<sup>rd</sup> paragraph: What does *inspection at delivery* mean? Farmers normally don't dispose on equipment needed for the detection of contaminants.

Last paragraph: replace ...*veterinary chemicals* ... by ...*veterinary drugs* ...

**UNITED STATES**

Modify Section 6.2.2 to read as follows:

*Only feed ingredients produced in accordance with good agricultural practices (see subsection 6.1) should be used in on-farm manufacture of feeds. Ingredients should be purchased only from reputable sources off-farm, and carefully inspected and tested (samples collected for analyses) at delivery to ensure the absence of biological, chemical, or physical contaminants that could pose a risk to food safety. Feed ingredients that are deemed to be unsatisfactory and are rejected, should be clearly identified and promptly returned to the supplier.*

*Waste and contaminated or spoiled materials should be safely disposed of to avoid contamination of the feed and feed ingredients, water supply and the farm environment.*

*Only approved/registered veterinary drugs and feed additives should be used.*

**Rational:** The wording and the organization used in the proposed modification are clearer and more concise.

**EUROPEAN COMMUNITY**

This section should be amended to read as follows:

*“Feed ingredients produced on the farm should be produced in accordance with good agricultural practice (section 6.1).*

*Chemically treated sowing seed should not be used for the production of feed.*

*Off-farm feed ingredients should be sourced from suppliers meeting the requirements of this code and should if necessary be inspected and analysed on delivery to detect any undesirable substances. Special care should be taken when changing or purchasing from different suppliers of feed materials to ensure that no hazards are introduced. Additional checks should be considered in this respect. Additional controls, especially related to transport conditions, should be taken into account.*

*The traceability of off-farm feed ingredients should be ensured.*

*Rejected feed ingredients should be clearly identified and promptly returned to the supplier, destroyed or put to uses other than feed production, and reported to the competent authorities.*

*Waste and contaminated or spoiled materials should be safely disposed of to avoid contamination of feed and feed ingredients, water supply and other feed sources.*

*Only authorised feed additives should be used.”*

**COMMENT:**

- This section should draw attention to the possible risks involved when changing supplier.
- A provision should be included for the safe disposal of rejected feed ingredients, since disposal may in some cases be more appropriate than returning the feed to the supplier.

**6.2.3 Mixing**

Mixing and processing premises should be kept as clean and as free of pests as practicable and should be designed and maintained to prevent water damage of feed ingredients and feed. Mixing machinery should be appropriate, easily operated, cleaned and maintained. Entry of personnel and animals, including pets, into the premises should be controlled.

Feed should be mixed in a manner that will minimise the potential for cross-contamination between ingredients and feed or other products that may have an effect on the safety, efficacy or withholding period for the feed. Medicated feeds should be accurately and adequately mixed so that the correct level of veterinary drug and/or food additive is supplied to livestock in a manner that is representative. Only approved veterinary drugs and feed additives should be used.

Mixing machinery should be cleaned after a run to prevent cross-contamination between batches.

**COMMENTS:****BRAZIL**

Brazil suggests deleting last sentence :

~~“Mixing machinery should be cleaned after a run to prevent cross-contamination between batches.”~~

**CANADA**

Canada suggests rewording of the second paragraph as follows to simplify the second sentence and remove the last sentence as the use of approved ingredients is required under Section 6.2:

*Feed should be mixed ... withholding period for the feed. Medicated feeds should be accurately and adequately mixed so that the correct level of veterinary drug and/or feed additive is supplied to livestock.*

Canada suggests that additional detail on equipment cleanout methods be added to the last sentence in this section as follows:

*Mixing machinery should be cleaned (via sequencing, flushing, or physical means) after a run of feed containing certain veterinary drugs or feed additives to prevent unintentional cross-contamination between batches which could negatively affect consumer health.*

**NORWAY**

Incorporation of veterinary medicine should comply with the code already established for such products.

**SWITZERLAND**

2<sup>nd</sup> paragraph, 4<sup>th</sup> line: replace ... *food* additive ... by ... feed additive ...

**UNITED STATES**

Modify Section 6.2.3 to read as follows:

**6.2.3. *Mixing of feed ingredients***

*The premises on which mixing is carried out should be kept as clean and as free of pests as practicable, and should be designed and maintained to prevent water damage of feed ingredients and feed. Mixing machinery should be appropriate, easily operated, cleaned and maintained. Entry of personnel and animals, including pets, into the premises should be controlled.*

*Feed should be mixed long enough to ensure the proper blending of the various ingredients. When adding drugs or food additives to the mixture, care should be taken to ensure that the correct level of drug and/or food additive is added and that the combination is mixed thoroughly enough to assure a uniform distribution*

*of medication or additive throughout the mixture. Only approved veterinary drugs and feed additives should be used.*

*Mixing machinery should be cleaned/flushed after a run to prevent cross-contamination. Alternately, feed mixing may be sequenced to prevent cross-contamination between batches.*

Rational: The wording and the organization used in the proposed modification are clearer and more concise.

#### **EUROPEAN COMMUNITY**

The second and third paragraphs should be replaced by:

*“Feed should be mixed in a manner that will prevent cross-contamination between ingredients and feed or other products that may have an effect on the safety, efficacy or withholding period for the feed.*

*Mixing machinery should be cleaned after a run in order to prevent cross-contamination between batches, where necessary.”*

The following should be inserted after the third paragraph:

*“Inspections and control procedures laid down in section 4.4. of this code should be applicable to mixing and processing of feed on-farm”.*

#### **6.2.4 Storage**

Feed and feed ingredients should be clearly identified and be stored separately to preserve their identity and prevent cross-contamination, including with medicated feeds. Feed ingredients that may require analysis to ensure food safety should be adequately identified and isolated until approval for their use is obtained.

Feed and feed ingredients should be stored in a manner so that rotation of stock occurs, preferably on a “first in first out” basis, to discourage microbial growth of contaminants and to ensure the proper activity of feed additives, including medicaments.

Storage areas should be structurally sound, adequately maintained and kept clean, dry and at an appropriate temperature and humidity to minimise microbial growth. Where appropriate, pathogen control procedures should also be used. Effective pest control regimes should be implemented. Access by wildlife and other animals should be minimised.

Buildings and storage containers should be well ventilated and monitored to minimise contamination or deterioration of feed and feed ingredients.

#### **COMMENTS:**

##### **CANADA**

Canada suggests rewording and combining the single sentence in the second paragraph and the first sentence of the third paragraph to simplify the first sentence and to remove the requirement for temperature and humidity controls for on farm feed storage from the second as this is neither necessary or practical. The suggested revised text is as follows:

*Feed and feed ingredients should be stored in a manner so that rotation of stock occurs to minimise microbial growth and to ensure the proper activity of feed additives, including veterinary drugs. Storage areas should be structurally sound, adequately maintained and kept clean and dry to minimise microbial growth.*

##### **SWITZERLAND**

2<sup>nd</sup> paragraph, last word: replace ... *medicaments* by ... veterinary drugs.

##### **UNITED STATES**

Modify Section 6.2.4 to read as follows:

*Feed ingredients and feeds, including medicated feeds, should be clearly identified and stored separately to preserve their identity and prevent cross-contamination. If there are doubts about the safety of a feed or feed*



*ingredient and samples of it are collected for analysis to confirm or eliminate the doubts, the suspect feed or ingredient should be adequately identified and isolated until after the receipt of the results of the analysis.*

*Feed and feed ingredients should be stored in a manner that facilitates their use on a "first in first out" basis, to discourage microbial growth of contaminants and to ensure the proper activity of feed additives, including medicaments.*

*Storage areas should be structurally sound, adequately maintained and kept clean, dry and at an appropriate temperature and humidity to minimize microbial growth. Where appropriate, pathogen control procedures should be used. Effective pest control regimes should be implemented. Access by wildlife and other animals should be minimized.*

*Buildings and storage containers should be well ventilated and monitored to minimize contamination or deterioration of feed and feed ingredients.*

**Rational:** The wording and the organization used in the proposed modification are clearer and more concise.

#### **EUROPEAN COMMUNITY**

The second paragraphs should be replaced by :

*“Feed and feed ingredients should be stored in such a manner that:*

- *rotation of stock occurs, preferably on a “first in first out” basis;*
- *feed and feed ingredients prohibited for certain species or categories of animals should be handled, stored, transported and kept separately from feed authorised for those species or categories .*

*Storage areas should be structurally sound, adequately maintained and kept clean, dry and at an appropriate temperature and humidity to prevent microbial and fungal growth. Where appropriate, pathogen control procedures should also be used. Effective pest control regimes should be implemented. Access by wildlife and other animals should be prevented.”*

#### **EUROPEAN FEED MANUFACTURERS FEDERATION (FEFAC)**

FEFAC proposes to replace “minimised” by “prevented” as the last word of the last sentence in paragraph 3 to read :

*“Access by wildlife and other animals should be **prevented**”.*

#### **6.2.5 Monitoring**

Appropriate records of GMP or HACCP procedures followed by on-farm feed mixers should be maintained to assist investigations of possible feed related contamination or disease events.

#### **COMMENTS:**

##### **SWITZERLAND**

... should be maintained where possible to assist investigations ...[as in 6.3.2.1]

Where record keeping is required, time period should be defined.

##### **UNITED STATES**

Modify Section 6.2.5 to read as follows and delete 6.2.5.1. since it is incorporated into modified 6.2.5:

6.2.5. *Record keeping* (titled changed from Monitoring)

*Appropriate records of GMP or HACCP procedures followed by on-farm mixers should be maintained to assist investigations of possible feed-related contamination or disease events.*

*Records should be kept of incoming feed ingredients. The records should include the dates of receipt and the batch or batches of feed in which they are used. A regular inventory of feed ingredients should be carried out to ensure that the correct feed ingredients have been used in the correct quantities. In some production systems, general feeding plans may be more appropriate.*

*Records should be kept of master formulas and mixing instructions and the dates on which feeds were mixed and used. The on-farm distribution of each batch of feed and the animals fed should also be recorded. Where veterinary drugs or feed additives are used, a record of procedures for adding these should be kept to promote accuracy. Records of the use of veterinary drugs in feed mixes should be kept to prevent contamination of other feed mixes.*

Rational: The wording and the organization used in the proposed modification are clearer and more concise.

#### **6.2.5.1 Records**

Records should be kept of incoming feed ingredients, date of receipt and batches of feed produced. A regular inventory of feed ingredients should be carried out to ensure that the correct feed ingredients have been used in the correct quantities. In some production systems, general feeding plans may be more appropriate.

Records should also be kept of master formulas and mixing instructions and the dates on which feeds were mixed and used. Where veterinary drugs or feed additives are used, a record of procedures for adding these should be kept to promote accuracy and prevent contamination of other feed mixes. Records of the use of veterinary drugs in feed mixes should be kept.

#### **COMMENTS:**

##### **CANADA**

Canada suggests rewording of the second paragraph as follows:

*Records should also be kept of master formulae, mixing instructions and the dates on which feeds were mixed and used. Where veterinary drugs or feed additives are used, a record of procedures for adding these should be kept to verify composition. Records of the use of veterinary drugs in feed mixes should be kept to prevent the potential for contamination of other feed mixes and facilitate tracebacks if required.*

##### **UNITED STATES**

See comments for Section 6.2.5.

##### **EUROPEAN COMMUNITY**

In the first sentence, the following should be inserted after the word “*produced*”:

*“and the name and address of the supplier.”*

In paragraph 2, second sentence, the words “*veterinary drugs or*” should be deleted.

The third paragraph should be deleted.

##### **EUROPEAN FEED MANUFACTURERS FEDERATION (FEFAC)**

FEFAC proposes to insert “formula alterations”, “and incoming feed ingredients”, and “including means to identify which livestock received the feed” in the first phrase of the second paragraph to read : “Records should also be kept of master formulas, *formula alterations*, and mixing instructions and the dates on which feeds *and incoming feed ingredients* were mixed and used *including means of identifying which livestock received the feed*”.

#### **6.3 GOOD ANIMAL FEEDING PRACTICE**

Good Animal Feeding Practice helps ensure the proper use of feed and feed ingredients on-farm while minimising the possible biological, chemical and physical risks to food animals and to consumers of this product.

#### **COMMENTS:**

##### **CANADA**

Canada suggests removing the reference to physical risks and rewording this section to clarify the linkage to consumer health as follows:

*Good Animal Feeding Practice helps ensure the proper use of feeds and feed ingredients on-farm while minimising the biological and chemical hazards which could impact negatively on consumers of food products of animal origin.*

#### **NORWAY**

Provisions for aquaculture need to be established. This must be co-ordinated with the present revision on the aquaculture code made by CCFFP. Norway would like to offer their assistance to this subject.

#### **UNITED STATES**

Modify Section 6.3 to read as follows :

##### **6.3. GOOD FEEDING PRACTICE**

*Feeds and feed ingredients should be used on-farm in ways that minimize their risk of serving as sources of biological, chemical and physical hazards to food animals and to consumers of food animals.*

Rational: The wording and the organization used in the proposed modification are clearer and more concise.

#### **EUROPEAN COMMUNITY**

GENERAL COMMENT: This section should contain provisions covering aquaculture.

##### **6.3.1 Pasture grazing**

The grazing of pastures, croplands or of ponds or other water bodies should be managed in a way that minimises the contamination of livestock by biological and chemical food safety hazards.

Where appropriate, an adequate rest period should be observed before allowing livestock to graze on pasture, crops and crop residuals and between grazing rotations to minimise biological cross-contamination from manure, where such a potential problem exists and to ensure that the withholding periods for agricultural chemical applications are observed.

#### **COMMENTS:**

#### **NORWAY**

The reference to “ponds” needs further clarification.

#### **SWITZERLAND**

1<sup>st</sup> paragraph: ... biological, chemical and physical [e.g. radioactivity] food safety hazards.

#### **UNITED STATES**

Modify Section 6.3.1 to read as follows :

##### **6.3.1. Grazing and foraging of pastures and croplands**

*The grazing and foraging of pastures and croplands should be managed in a way that minimizes the risk of the pastures and forages becoming sources of biological and chemical contaminants that are of food safety concern.*

*The management should include allowing an adequate rest period for a pasture or forage area between grazing or foraging groups of animals, and taking steps to ensure that the withholding periods for agricultural chemical applications are observed.*

Rational: The wording and the organization used in the proposed modification are clearer and more concise.

#### **EUROPEAN COMMUNITY**

The reference to “ponds” needs further clarification..

### 6.3.2 Feeding Manufactured feed

This section refers to feed manufactured both off-farm and on-farm.

#### 6.3.2.1 Off-farm Production

Feed and feed ingredients purchased should contain minimal chemical and biological residues and should be obtained from reputable suppliers who follow GMP or HACCP principles where possible. Feed blocks and salt licks should be used as recommended by the manufacturer.

#### COMMENTS:

##### **BRAZIL**

Brazils suggests amending the text as follows:

#### **“ 6.3.2 Feeding Manufactured feed**

~~This section refers to feed manufactured both off farm and on farm.~~

#### **6.3.2.1 Off-farm Production**

Feed and feed ingredients purchased should contain minimal chemical and biological residues and should be obtained from reputable suppliers who follow GMP or HACCP principles where possible. Feed blocks and salt licks should be used as recommended by the manufacturer”.

##### **CANADA**

Canada suggests that this section be deleted as this area is already adequately covered in Section 6.2.2.

##### **UNITED STATES**

Modify Section 6.3.2.1 to read as follows :

*Feed and feed ingredients purchased should contain minimal chemical and biological residues and should be obtained from reputable suppliers who follow GMP or HACCP principles where possible.*

Rational: The sentence “Feed blocks and salt licks should be used as recommended by the manufacturer.” does not relate to on-farm production and is inappropriate for this section.

##### **EUROPEAN COMMUNITY**

In the first sentence, the words “*reputable suppliers*” should be replaced by:

*“suppliers complying with the requirements of this code”.*

The second paragraph should be replaced by:

*“Compound feed and in particular premixtures of additives, mineral feed, feed blocks and salt licks should be used in accordance with the manufacturer's recommendations in order to avoid incorrect dosage etc.”*

The following should be inserted after the second paragraph:

*“Records should be kept of the receipt of produced feed, including the date, its supplier and manufacturer, and the purpose and time of feeding”*

##### **EUROPEAN FEED MANUFACTURERS FEDERATION (FEFAC)**

FEFAC proposes to insert “Feed and feed ingredients including ...” in the second phrase of paragraph 1 to read : **“Feed and feed ingredients including** feed blocks and salt licks should be used as recommended by the manufacturer”.

### 6.3.2.2 Distribution

The on-farm feed distribution system should ensure that the correct feed is sent to the right animal group. During distribution and feeding, feed should be handled so that biological and chemical contamination does not occur from contaminated storage areas and equipment. Non-medicated feeds should be handled separately from medicated feeds to prevent contamination.

#### COMMENTS:

##### **BRAZIL**

Brazils suggests merging sub-section 6.3.2.2 “Distribution” and 6.3.2.3 “Medicated Feeds” and revising sub-section heading, as follows:

#### **“ 6.3.2.2 1 On-farm feed distribution and care with medicated feeds”**

The on-farm feed distribution system should ensure that the correct feed is sent to the right animal group. During distribution and feeding, feed should be handled so that biological and chemical contamination does not occur from contaminated storage areas and equipment. Non-medicated feeds should be handled separately from medicated feeds to prevent contamination.

Ensure that medicated feeds are transported to the correct location and are fed to animals that require the medication. To prevent unsafe medication residues in animal products, use feed that does not contain drugs and chemicals. Where medicated feeds are used, that could produce residues in food, correct withholding periods must be maintained and records kept. Feed transport vehicles and feeding equipment used to deliver and distribute medicated feed should be cleaned after use, if a different medicated feed or undedicated feed is to be transported next.

Animals receiving medicated feeds should be identified until the withholding period has expired”.

##### **CANADA**

Canada recommends rewording this section as follows to include information in Section 6.3.2.3 related to cleanout procedures for equipment used to distribute medicated feeds:

*The on-farm feed distribution system should ensure that the correct feed is sent to the intended animal group. Feed transport vehicles and feeding equipment used to deliver or distribute medicated feeds, containing veterinary drugs that could produce residues in foods of animal origin, should be cleaned prior to being used to deliver or distribute a different medicated feed or unmedicated feed.*

##### **SWITZERLAND**

... so that biological, chemical and physical contamination ...

##### **UNITED STATES**

Modify Section 6.3.2.2 to read as follows :

*The on-farm feed distribution system should ensure that the correct feed is sent to the intended animal group. During distribution and feeding, manufactured feed should be handled so that biological and chemical contamination does not occur from contaminated storage areas and equipment. Non-medicated feeds should be handled separately from medicated feeds to prevent cross-contamination.*

Rational: The wording and the organization used in the proposed modification are clearer and more concise.

### 6.3.2.3 Medicated Feeds

Ensure that medicated feeds are transported to the correct location and are fed to animals that require the medication. To prevent unsafe medication residues in animal products, use feed that does not contain drugs and chemicals. Where medicated feeds are used, that could produce residues in food, correct withholding periods must be maintained and records kept. Feed transport vehicles and feeding equipment used to deliver and distribute medicated feed should be cleaned after use, if a different medicated feed or undedicated feed is to be transported next.

Animals receiving medicated feeds should be identified until the withholding period has expired.

#### COMMENTS:

##### CANADA

Canada suggests rewording this section such that it focuses on veterinary drugs which are recognized as having the potential to negatively impact on consumer health and also recommends the prudent use of all veterinary drugs. It may also be helpful to refer the reader to an appropriate document on prudent use if one exists. The revised text would read as follows:

*Prudent use of veterinary drugs is recommended to minimise the potential risks to consumers of food products of animal origin. Where feeds contain veterinary drugs, that could produce residues in foods of animal origin, correct withholding periods for the animals consuming the feed must be respected and the associated records kept. Animals receiving medicated feeds, containing veterinary drugs that could produce residues in foods of animal origin, should be identified until the withholding period has expired.*

##### NORWAY

A reference should be made to the established code of Veterinary drugs.

##### SWITZERLAND

1<sup>st</sup> paragraph, sentence 2 and 3: To prevent potentially unsafe medication residues in animal products, only approved veterinary drugs should be utilised. Statutory withholding periods must be observed and treatment records correctly kept.

Last sentence: ..., if a different medicated feed unmedicated feed is ...

##### UNITED STATES

Modify Section 6.3.2.3 to read as follows :

*Ensure that medicated feeds are transported to the correct location and fed to animals that require the medication. When medicated feeds are used, observe the specified withholding/withdrawal periods and keep appropriate records. Feed transport vehicles and feeding equipment used to deliver and distribute medicated feed should be cleaned after use, if a different medicated feed or unmedicated feed is to be transported next.*

*Animals receiving medicated feeds should be identified until the withholding/withdrawal period has expired.*

Rational: The wording and the organization used in the proposed modification are clearer and more concise. In addition, the sentence “To prevent unsafe medication residues in animal products, use feed that does not contain drugs or chemicals.” makes no sense in section addressing the use of medicated feeds; it is understood that if a feed does not contain a medication or chemical the feed cannot cause a residue in the animal.

**EUROPEAN COMMUNITY**

This section should be replaced by:

*“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<sup>3</sup>.”*

**6.3.3 Stable feeding and lot/intensive feeding unit**

**COMMENTS:****NORWAY**

The section should be revised to also include aquaculture.

**UNITED STATES**

Modify Section 6.3.3 to read as follows :

*Feeding of animals in stables, feedlots, aquaculture tanks or other intensive feeding units*

Rational: The proposed heading more accurately describes the section.

**EUROPEAN COMMUNITY**

The title should be changed to:

*“6.3.3. Hygiene of the animal production unit”*

**6.3.3.1 Location**

The animal production unit should be located in an area that does not expose the animals and their end-products to the risk of biological and chemical contamination.

**COMMENTS:****EUROPEAN COMMUNITY**

The title “6.3.3.1. Location” should be deleted.

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<sup>3</sup> CAC/RCP 38-1993

### 6.3.3.2 Hygiene

The livestock production unit should be designed so that it can be adequately cleaned. The livestock production unit and feeding equipment should be thoroughly cleaned regularly to prevent build-up of biological and chemical hazards. Chemicals used for cleaning and sanitising should be used according to instructions, labelled and stored away from feed and feeding areas.

A pest control system should be put in place to control the access of pests to the animal production unit to minimise the possibility of biological contamination of feed and bedding materials or culture units.

Buildings and feeding equipment should be kept clean. Systems should be put in place to regularly remove manure, waste material and other possible sources of biological contamination of feed.

Ensure that feed and bedding material used in the animal production unit is frequently changed and is not allowed to become mouldy and that mouldy feed and bedding material is not consumed by animals.

Operators and employees working in the animal production unit should observe appropriate hygiene standards to minimise the possibility of biological cross-contamination of feed.

#### **COMMENTS:**

##### **ARGENTINA**

Replace the 4<sup>th</sup> paragraph with the following:

*On farms it is necessary to check that animal feeding and bedding materials are changed frequently or that their use is prolonged through the application of good management practices or suitable products, approved by the competent authorities. Furthermore it is necessary to ensure that they do not become mouldy and that animals do not eat mouldy feed or bedding materials.*

This is based on the consideration that in poultry husbandry, the “bed” of chickens and hens is reused several times through the application of different techniques and products. This is a usual and well accepted practice among the major producing countries, incorporating best practice in animal production.

##### **BRAZIL**

Brazils suggests amending first paragraph as follows:

“The livestock production unit should be designed so that it can be adequately cleaned without compromising the environment with unwanted residuals. The livestock production unit and feeding equipment should be thoroughly cleaned regularly to prevent build-up of biological and chemical hazards. Chemicals used for cleaning and sanitising should be used according to instructions, labelled and stored away from feed and feeding areas

##### **CANADA**

Canada suggests that the last paragraph in this section be deleted as there does not appear to be a linkage between personal hygiene of employees and consumer health.

##### **SWITZERLAND**

4<sup>th</sup> paragraph: delete ... *is frequently changed and ...* Modern systems allow a long term utilisation of bedding material without a risk of mouldy material.

##### **UNITED STATES**

Modify Section 6.3.3.2 to read as follows :

*The livestock production unit should be designed so that it can be adequately cleaned. The livestock production unit and feeding equipment should be thoroughly cleaned on a regular basis to prevent build-up of biological and chemical hazards. Chemicals used for cleaning and sanitizing should be used according to instructions on the label. When not in use, the chemicals should be stored in clearly labelled containers away from feed and feeding areas.*



*A pest control program should be put in place to keep rodents and other pests out of the animal production unit, and minimize the risk of biological contamination of feeds and bedding materials or aquaculture units.*

*Manure, waste material and other possible sources of biological contamination of feed should be removed on a regular basis.*

*Ensure that feed is not allowed to become moldy, and that bedding materials and litter are frequently changed and not allowed to become moldy.*

*Operators and employees working in the animal production unit should observe appropriate hygiene standards to minimise the possibility of biological cross-contamination of feed.*

Rational: The wording and the organization used in the proposed modification are clearer and more concise.

#### **EUROPEAN COMMUNITY**

The title “6.3.3.2. *Hygiene*” should be deleted.

#### **6.3.4 Water**

Drinking and water for aquaculture should be of adequate quantity and quality for animals. Where there is reason to be concerned about biological or chemical contamination of livestock through drinking water, or through direct contact of aquatic animals, measures should be taken to evaluate and minimise the hazards. Watering systems should be cleaned and monitored regularly, where possible.

#### **COMMENTS:**

#### **UNITED STATES**

Modify Section 6.3.4 to read as follows :

*Drinking and water for aquaculture should be of adequate quantity and quality for animals. Where there is reason to be concerned about biological or chemical contamination of livestock through drinking water, or through direct contact of aquatic animals, measures should be taken to evaluate and minimise the hazards. Watering systems should be cleaned and monitored regularly.*

Rational: If it is not possible to regularly monitor a water source/system for contaminants then water from that source should not be used. Therefore the words “where possible” should be removed.

#### **EUROPEAN COMMUNITY**

At the end of the paragraph, the words “*where possible*” should be replaced by: “*where necessary*”.

#### **INTERNATIONAL UNION OF MICROBIOLOGICAL SOCIETIES/INTERNATIONAL COMMITTEE ON FOOD MICROBIOLOGY AND HYGIENE (ICFMH/IUMS)**

Under 6.3.4 Water is dealt with drinking water. It might be better to write Drinking water for animals and water for aquaculture”. the paragraph seems to reflect what is applicable in good farming practice.