

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 4

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD-HOC INTERGOVERNMENTAL CODEX TASK FORCE ON ANIMAL FEEDING

Seventh Session

Berne, Switzerland, 4-8 February 2013

DRAFT GUIDELINES ON APPLICATION OF RISK ASSESSMENT FOR FEED

Comments at Step 6 (in reply to CL 2012/22-AF) of

India and OIE

INDIA (revised comments)

DEFINITIONS

The definition of “**Contaminant**” should be replaced as below:

“Contaminant means any substance not intentionally added to food or feed for food producing animals, which is present in such food or feed 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 feed, or as a result of environmental contamination. The term does not include insect fragments, rodent hairs and other extraneous matter.”

RISK ASSESSMENT IN THE CODEX RISK ANALYSIS FRAMEWORK

Paragraph 11: The text should be modified as below:

A risk assessment is commissioned by the risk manager. Preliminary risk management activities include identification of a food safety problem arising from feed; establishment of a risk profile; ranking of the hazard for risk assessment and risk management priority; determination of a risk assessment policy for the conduct of the risk assessment; commissioning of the risk assessment; and consideration of the result of the risk assessment. [~~Reference is made to the Proposed draft prioritised list of hazards in feed (ad hoc Intergovernmental Task Force on Animal Feeding)~~].

Rationale: The text refers to the prioritized list of hazards in feed which is a dynamic list and need not be referred in this document.

Paragraph 14: The text should be modified as below:

Experts responsible for risk assessment should be selected in a transparent manner on the basis of their expertise, experience and their independence with regard to the interests involved. The procedures used to select these experts should be documented and may include a public declaration of any potential conflict of interest. This declaration could also identify and detail their individual expertise, experience and independence.

Rationale: The procedures used to select the experts should include declaration of potential conflict of interest.

Paragraph 19: The text should be modified as below:

Feed additives and veterinary drugs [~~and pesticides~~] used in feed, which have been assessed for safety and which have been used under stated conditions of use as pre-approved by the competent authorities should not be prima facie considered as a hazard.

Rationale: Pesticides are not used in feeds.

Paragraph 22: The text should be modified as below:

{Factors to be considered which can markedly influence the occurrence of a given hazard in feed and which may be specific to a locale, country, or region, include environmental conditions and interactions with other

materials during growth, harvesting, drying, storage, handling and transport.}

Rationale: The guidance in the paragraph, on factors to be considered which can markedly influence the occurrence of a given hazard, is useful and acceptable.

Paragraph 32: The text should be modified as below:

Analytical laboratory methods should be validated using scientifically recognized principles and procedures in accordance with the { General Criteria for the Selection of Methods of Analysis Using the Criteria Approach (Codex Alimentarius Commission, Procedural Manual) }.

Rationale: The reference to the 'General Criteria for the Selection of Methods of Analysis Using the Criteria Approach' in the Codex Procedural Manual is useful and acceptable.

Paragraph 34: The text should be amended as below:-

*'Human exposure is considered under Risk characterization. **In respect of feed, the human exposure is estimated through animal exposure and transfer/transmission of contaminant from animal to edible product. This may require modeling of intake of relevant feed in animals and of foods and food groups in specified human groups.***

Rationale: To increase clarity and include relevant guidance related to estimation of human exposure.

Paragraph 41: The text should be modified as below:

Risk characterization considers the key findings from hazard characterization and exposure assessment to estimate the risk for a given population. Establishing the probability of occurrence and severity of an identified adverse effect is the expected result of risk characterization. {Feed exposure assessment considers hazards in edible products. Human exposure assessment is conducted during risk assessment for foods. ~~This may require modelling of dietary intake of relevant foods and food groups in specified human groups.~~ The results of such assessments are considered in setting limits for hazards in food, such as national or Codex maximum limits or levels. }

Rationale: The deleted sentence is proposed to be included in the paragraph 35 where it is more appropriate. Please see also the comment on Paragraph 35 above.

OIE

Paragraph 6. These guidelines are applicable.....Agents, which may adversely affect animal health but which have no impact on food safety, are not considered in these guidelines, as they are not within the scope of the Codex Alimentarius.

The OIE would like to propose that the following footnote be added to the last sentence of paragraph 6., i.e.

Footnote: 'for hazards in feed which may adversely affect animal health refer to the OIE *Aquatic Animal Health Code* and the *Terrestrial Animal Health Code* available at www.oie.int'

Rationale: Given the role of the OIE and Codex in the food continuum, this footnote provides a clear reference to relevant OIE international standards.