CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 5 **CX/AF 13/7/5 Add.2**
January 2013
Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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

Seventh Session
Berne, Switzerland, 4-8 February 2013

PROPOSED DRAFT GUIDANCE FOR USE BY GOVERNMENTS IN PRIORITIZING THEIR NATIONAL FEED HAZARDS

Comments at Step 3 of India, IFIF and OIE

INDIA

Annex 2 (Example of the Prioritization Process)

Steps 4 and 5 have not been completed. It would be useful if an example on aggregation of scores using one of the methods listed in Annex 3 is also included in Step 4 and an example of reporting is included in Step 5.

Rationale: This would complete the example and would improve understanding of the reader about the process of prioritization of hazards in feed.

On behalf of the International Feed Industry Federation (IFIF) I would like to submit IFIF's comments the on the *draft guidance for use by governments in prioritizing the national feed hazard (TF AF*), (now at step 3) of the Task Force on Animal Feeding.

IFIF

(i) IFIF general Comments

IFIF appreciates very much the effort made by the Swiss chair of the CODEX Task Force to clarify the process of prioritising the hazards in the different CODEX Member States. The new document proposes a better insight of how the prioritisation should be done and introduces the concept of Multi-Criteria Assessment, used in some countries for decision-making. Finally, IFIF supports the view that the prioritisation process should be transparent, documented and consistent, as allowed by the proposed process.

IFIF recognizes that the proposed 5-step prioritisation process would allow Risk Managers to base their risk management decisions on an objective, transparent and science based process.

IFIF welcomes in particular the listing of the risk-profiling step as an essential step, which should provide the necessary information to risk managers on how to characterize and classify an emerging feed safety hazard.

IFIF considers the proposed Multi-criteria decision analysis as an innovative concept with a high potential to improve the efficacy and quality of future risk-proportionate management decisions. We consider it however as necessary to further discuss this approach in order to assess its practicalities and potential limitations possibly by extending further the list of practical examples given in annex II.

(ii) IFIF specific Comments

- *Para 16*. When knowledge gaps prevent identification of a clear association between a hazard/feed/edible product combination and a food safety problem, the risk manager ~~should~~ **may** include the combination in the next step (risk profiling) to obtain additional information.

- Step 3: Establishment of the criteria applicable to the hazard/feed/edible product combinations for prioritization

COMMENT: Should this area include some mandatory criteria to ensure a quality Risk Profiling and prioritization process?

- *ANNEX 1, para 3*: The primary microbiological hazards in feed that transfer to edible products of food-

producing animals are zoonotic microorganisms which contaminate ~~animal and vegetable protein meals~~ **plant or animal feed ingredients (*COMMENT: Should be broader that one group of raw materials*)** fed to animals. They may be introduced into feed crops, forages and water from contaminated pasture land, may be present in animal materials which are used for feed, and may be introduced to feed by cross-contamination or carry- over during processing, transport, and storage.

- ANNEX 1: ~~Viruses~~

COMMENT: As there is no example of relevance for viruses providing a hazard for the feed/edible product combination, and as it is stated that this is outside the scope of this guidance, we recommend Viruses be deleted.

~~7. Some viruses such as hepatitis E are pathogenic to both food-producing animals and humans (Hepatitis E. WHO Fact sheet N°280. Revised July 2012; http://www.who.int/mediacentre/factsheets/fs280/en/). Viral contamination of feed is possible via body fluids of infected animals. The most likely route of contamination of edible products of food-producing animals is probably external, by contamination with virus-containing faeces, which is outside the scope of this guidance.~~

- TABLE 1: Mycotoxins

Produced by carbohydrate-catabolising fungi in high humidity conditions on cereals (e.g. wheat, sorghum, maize, rice, oats), in oilseeds (e.g. groundnut, ~~soybean~~, sunflower, cotton) and silage.

- TABLE 1: ~~Pyrrizolidine alkaloids~~, terpenes, glycosides

COMMENT: There is no scientific basis on the exposition of humans to pyrrizolidine alkaloids.

- ANNEX 2 EXAMPLE OF THE PRIORITIZATION PROCESS

COMMENT: The examples and details given are very general and do not give a clear understanding why or why not a decision has been taken. Example is: why only one shipment was sufficient to consider cadmium as a hazard to prioritize? It may give the idea that only one incident is sufficient to prioritize a hazard or maybe there were other information that the country was taking into account.

The text should give all the considerations raised as to show how process is to be conducted.

- Step 5. Reporting

COMMENT: Although references are given in Annex 3, a model (maybe simple) should be used here as to complete the exercise.

This is the most important step in the whole process.

COMMENT: The statement does not give any contribution to the explanation of this step. The minimum content of the report should be exemplified.

OIE

Paragraph 5. ‘Agents which may adversely affect animal health, but which have no impact on food safety, are not considered.

The OIE would like to propose that the following footnote be added to paragraph 5., 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.