



Divisie Consument & veiligheid

Date
27 August 2012

Our ref
NVWA/2012/3463

ANNEX 1: comments on the draft report

Comments with regards to the translation into Dutch

- Page 2, point 4, second to last sentence. 'een bestanddeel dat het later gebruik van het mengsel in veevoeder uitsluit' should be translated as 'een bestanddeel dat het gebruik van het mengsel voor voederdoeleinden uitsluit'.
- Page 2, point 5.1, bevindigen: 'divisie Consumenten en veiligheid' should be 'Divisie Consument en Veiligheid'.
- Page 3, point 5.2, bevindingen. In the first paragraaf hit says 'tijdelijke erkenningen'. This should be 'voorwaardelijke erkenningen'.
- Page 3, point 5.2, 5th indent: in the text the words 'vleesmeel' and 'vleesbeendermeel' are used. This is not correct and should be: 'verwerkte dierlijke eiwitten' given the fact that is handles on material derived from cat. 3 material. Processed proteins derived form act. 2 or cat. 1 material must be named 'vleesbeendermeel'.
- Page 6, point 5.4.1., first indent: change the words 'voerden aan' into 'verklaarden'.
- Page 9, 2nd intend: typo in the 3rd sentence. 'dag' should be 'dat'.
- Page 9, 4th indent. Change 'omdat deze' into 'die'.
- Page 10, point 5.6, 2nd indent. Change the word 'vleesbeendermeel' into 'verwerkte dierlijke eiwitten'.

Comments with regards to the English draft report

- Executive summary, 6th paragraph: please change 'a number of recommendations' into 'three recommendations'.
- Page 2, point 5.1, findings. The explanation about the activities of the Criminal Investigation Division is not entirely correct. I would propose to change this into: "The Criminal Investigation Division (NVWA – Inlichtingen- en Opsporingsdienst) deals with complicated fraude cases including criminal investigations and the legal proceedings. If necessary they are assisting with the prosecution of recurrent violators." See also page 10, point 5.6, first indent to change the wording.
- Page 3, point 5.2, findings, 3rd intent. Change 'eight' into '8' (consistency).
- Page 3, point 5.2, 5th indent: in the text the words 'meat meal' and 'meat and bone meal' are used. This is not correct and should be: 'processed animal proeetins' given the fact that is handles on material derived from cat. 3 material. Processed proteins derived form act. 2 or cat. 1 material must be named 'meat and bonemeal'. See also page 10, point 5.6, 2nd indent.
- Page 6, point 5.4.2, first indent. The sentence 'However, no indications....the mixture for feeding purposes. 'is not entirely correct. The FVO inspector was offered the report on which the 60% manure is recommended to the Dutch Ministry of EL&I, but didn't find it necessary to see it. So the assessment that 'no indications were provided' is not correct. The FVO inspector cannot know this, because he hasn't seen the report.
- Page 9, point 5.5, 2nd indent. This sentence is not entirely correct: Omdat de NVWA zag dag de voorschriften goed werden nageleefd, is het aantal GTH-monsters de afgelopen jaren gereduceerd en werd het werkterrein van verwerkingsbedrijven verlegd naar de distributie van verwerkte dierlijke eiwitten om te waarborgen dat geen vlees- en beendermeel van categorie 1 en categorie 2 in verwerkte dierlijke eiwitten voorkomt. We



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did not reduce the amount of GTH samples at the rendering plant, but we are taking more samples further along the production chain, such as storage facilities (risk based).

- Page 9, point 5.5, 4th indent. The text in this indent is not very clear. We propose this: producers do not comply with the requirements with regards to the mixing component due to the nature and mixing concentrations of the mixing component laid down in Dutch legislation, because this would destroy their products.