EUROPEAN COMMUNITY COMMENTS

Request for proposals for future work by Codex on Animal Feeding and information on national experience in implementing the Codex Code of Practice in Good Animal Feeding (CAC/RCP 58-2004) (to be considered at the 31st session of the Codex Alimentarius Commission)

CL 2007/19-CAC

1. Background

This document is the European Community response to Codex Circular Letter CL 2007/19-CAC with a request for proposals for future work by Codex on Animal Feeding and information on the national experience in the implementation of the Codex Code of Practice in Good Animal Feeding (CAC/RCP 54-2004) to be considered at the 31st Session of the Codex Alimentarius Commission in July 2008. The deadline for comments is 31 March 2008.

The aim of food standards and other related text adopted by the Codex Alimentarius is to protect consumer health and to ensure fair practices in the food trade. The food chain is becoming increasingly complex. Every part of the chain must be as strong as the others if we want to adequately protect human health. It is essential to assess and monitor the risks to consumer health associated with the use of different feed ingredients as well as those associated with feed processing, feed production and trading practices.

All the food scares and incidents that occur with products of animal origin, and especially those deriving from animal feed, demonstrate that Codex standards should follow a comprehensive and integrated approach throughout the food chain. Feed is an important element in the food chain, and needs to be addressed at the same level as any other elements. The safety of foods of animal origin, their potential risk to consumer health and fair practices in the food trade must be fully considered. There is no internationally uniform legislation or sets of controls in this area. Harmonisation of controls and good practices is to be encouraged and developed.

The Codex Code of Practice on Good Animal Feeding, adopted by Codex in 2004 was a major step in this area and after four years since its adoption and use by Members, it is now desirable to continue this work into other important areas.

In reply to the Circular Letter 2007/19-CAC, the European Community proposes to Codex to undertake work in this area in accordance with the project document described in Annex I.

In addition, the European Community describes experience in the implementation of the Codex Code of Practice of Good Animal feeding both at European Community level and its Member States in Annex II.
1. Purpose and scope of the proposed work

The purpose of the work is to develop scientific and technical guidance allowing the development of standards, guidelines, codes or recommendations, as appropriate, for feeds to supplement the Code of Practice of Good Animal Feeding. This focuses on three particular areas, on the basis of scientific evidence, risk analysis and having regard to other legitimate factors relevant to the health of consumers and to ensure fair practices in the food and feed trade.

2. Relevance and timeliness of new work

The Code of Practice on Good Animal Feeding was adopted by Codex in 2004. The Codex members are implementing this code. The Code of Practice was developed on the basis of an ad hoc Intergovernmental Codex Task Force on Animal Feeding (2000-2004).

During the last few years there has been a substantial increase in the worldwide trade in feeds and feed ingredients, this trend is very likely to continue. Differences regarding feed safety in the international trade and gaps in the current Code of Practice in Good Animal Feeding may result in trade obstacles.

The aim of the future work should be to ensure that such work is in step with other developments in Codex and makes a major contribution to the safety of the feed sector for which other committees have not developed specific standards. The work will focus on the development of additional complementary guidance in the interest of increased feed and food safety, rather than rewriting or updating the current Code.

3. Main aspects to be covered

(a) minimisation of the presence of undesirable substances (contaminants) in animal feed:

- to identify known or emerging risks/hazards related to the presence of contaminants which are a risk for human consumers of livestock products in main feed ingredients in international trade

- to suggest work priorities with regard to specific contaminants. As a starting point, the following non-exhaustive list can be considered: lead, cadmium, arsenic, mycotoxins (aflatoxins, ochratoxin A, …), dioxins and PCBs.

- to develop sound methodology for the development of maximum limits for contaminants in feed. This should address e.g. the suitability of the establishment of
maximum tolerable levels of intake of contaminants by different animal categories or species in order to ensure that maximum limits in food are not exceeded.

- to develop new or update existing more specific Codes of Good Practice to minimise or eliminate the presence of specific contaminants in feed complementary to the Code of Practice of Good Animal Feeding;

(b) to supplement the Code of Practice for Good Animal Feeding to develop guidelines on HACCP (Hazard Analysis and Critical Control Points);

(c) to develop detailed rules for a global system for exchanges of information in feed control emergency situations or cases of rejection of imported feed. This should focus in particular in the setting of criteria for notification and minimum information required in a notification;

(d) to develop general principles and guidelines for science based risk assessment and safety criteria of feed ingredients or categories of ingredients;

(e) when addressing these aspects the work should take full account of, and collaborate with, other Codex committees. In particular for the activities mentioned in letter (a) the work should ensure full collaboration with the Codex Committee on Contaminants in Foods (CX-735) and in particular take into account existing codes of practice such as CAC/RCP 45-1997, CAC/RCP 51/2003 and CAC/RCP 62-2006. As regards the activity mentioned in letter (b), the work should ensure collaboration with the Codex Committee on Food Hygiene (CX-712). As regards the activities mentioned in letter (c), the work should ensure full collaboration with the Codex Committee on Food Import and Export Certifications and Inspection Systems (CX-733). The work should also take full account of and collaborate with other relevant international bodies within FAO, WHO, OIE and IPPC.

4. Assessment against the criteria for the establishment of work priorities in Codex

(a) Consumer protection from the point of view of health and fraudulent practices.

The Code of Practice on Good Animal Feeding is a good instrument aimed at improving food safety. Nevertheless, it is not comprehensive and it is desirable to address additional issues in order to strengthen consumer protection and ensure fair trade.

The FAO/WHO expert consultation of October 2007 identified various groups of substances that have a direct impact on human health and for which maximum levels should be considered for substances such as heavy and other metals (e.g. cadmium and lead); toxins (e.g. mycotoxins); dioxins, furans and dioxin-like PCBs. Many of these substances are hazardous because of their high persistence, bioaccumulation and toxicity.

Specific HACCP systems have been designed for the food chain, and the guidelines for implementation of HACCP principles have mainly focused on the food industry. Codex should encourage developments towards the application of HACCP principles along the different steps of the feed chain. Section 4 of the Code of Practice on Good Animal Feeding emphasises the importance of the application of HACCP principles in feed manufacture.
(b) Diversification of national legislations and apparent resultant or potential impediments to international trade.

As the proposed topics are not included in any international standards, guidelines or recommendations, absence of international harmonisation activity could lead to divergent national standards which might represent undue potential barriers to international trade of feed. Many countries have established limits for the contaminants mentioned above.

This proposed new work would provide internationally-recognized guidance on the areas defined in this scope which national/regional authorities may use. Such internationally-agreed guidance can help to ensure consistent approaches to food safety as regards the specific aspect of feed.

c) Scope of the work and establishment of priorities between the various sections of the work.

The scope of the work relates to work previously undertaken by Codex.

d) Work already undertaken by other international organisations in this field.

This proposed new work is an extension of work previously carried out by several Codex Committees. It is intended to build and be consistent with work undertaken within WHO, FAO and OIE.

5. Relevance to the Codex strategic objectives

The new work proposed would contribute both to the safety of human health and to ensuring fair practices in the feed trade by satisfying specially the following goals in the CAC Strategic Plan 2008-2013.

Goal 1: Promoting sound regulatory frameworks.

Goal 2: Promoting widest and consistent application of scientific principles and risk analysis.

Goal 3 Promoting cooperation between Codex and Relevant International Organisations.

6. Information on the relationship between the proposal and other existing Codex documents

The proposed document will fully take into account the provisions in the Code of Practice on Good Animal Feeding. (CAC/RCP 54-2004).

The document should address the need to clarify the extension and applicability of the Code of Practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001) to animal feed.

Feed-specific HACCP guidelines will help improve feed hygiene conditions, increase confidence in the food and feed supply chain and reduce barriers to international trade. Often feed materials that are safe *per se* may undergo processing, transport, storage, etc under poor hygienic conditions and become unsafe. The Codex Committee on Food Hygiene (CCFH)
only covers in its terms of reference the aspects related to food hygiene; therefore it is wholly justified that the new Task Force should develop minimum standards for feed hygiene. Other committees have stressed the importance of aspects related to feed hygiene in the context of food safety.

The Task Force should perform this task in line with the work already performed by the Codex Committee on Food Import and Export Certification and Inspection Systems (CCFICS), in particular the Guidelines for Exchange of Information between Countries on Rejection of Imported Food[1] and the Guidelines for Exchange of Information in Food Control Emergency Situations[2]. The CCFICS has focused on food, therefore aspects related to feed should be developed by a Task Force in collaboration with CCFICS.

The Task Force should perform this task in line also with the work already performed by the former Codex Committee on Food Additives and Contaminants (CCFAC) in particular in identifying known or emerging risks/hazards related to presence of contaminants which are a risk for human consumers of livestock products.

The proposed document/s will fully take into account the new work being developed by the Task Force on Antimicrobial Resistance (TF AMR) if endorsed by the CAC in the three proposed areas:

- Science-based Risk Assessment (regarding food borne antimicrobial resistant – micro organisms;
- Risk Management to contain food borne antimicrobial resistant micro organisms, and
- Risk Profiles for food-borne antimicrobial resistant micro organisms

A system to provide control authorities with an effective tool for exchange of information on measures taken to ensure food safety can be very effective in protecting public health. Guidance to exchange information is not new in the food sector but it has not been developed in the case of feed. The development of a global system to exchange information is critical for limiting the spread of a food safety problem and to allow the implementation of appropriate measures in a timely fashion. A Task Force should take into consideration at least the following elements: scope, objectives, criteria for notification and types of notification, establishment of official contact points; and minimum information required in a notification.

7. Identification of availability of expert and scientific advice

FAO/WHO organised an expert consultation meeting from 8-12 October 2007. The conclusions, suggestions for further work and recommendations from this expert consultation are an important contribution for considering future work in this area of feed related food safety within Codex.

There are also other international activities which need be taken into consideration. The most relevant ones are:

- The OIE has developed a section about feed safety regarding animal health in its Terrestrial Code.

- The International Feed Industry Federation (IFIF) is finalising a document entitled "Good practices for the animal feed industry" implementing the Codex Code of Good
Animal Feeding. This is a very ambitious document encompassing many areas relating to the feed industry.

8. **Identification of any need for technical input to the standard from external bodies so that this can be planned for**

If required, additional input may be requested including from FAO/WHO/OIE to establish an expert consultation to provide additional technical advice.

9. **Proposed time line**

In order to develop the proposed new work, a Task Force shall complete its work within four years (one session per year). The first session of the Task Force will be convened the year (during the last quarter) following the decision by the CAC to approve the new work. Adoption at step 5 will be at the latest at the third session of the Task Force, with adoption at step 8 by the CAC the following year.
EXPERIENCE IN IMPLEMENTING THE CODEX CODE OF PRACTICE IN GOOD ANIMAL FEEDING

As regards European Community legislation, the principles and philosophy of the Code of Good Animal Feeding is used whenever modifying existing EC legislation relating to feed. Annexes I – III of Regulation (EC) 183/2005 laying down requirements for feed hygiene, contain many of the provisions of the Codex Code of Good Animal Feeding. The Regulation itself and additional information can be found at:
http://ec.europa.eu/food/food/animalnutrition/feedhygiene/index_en.htm

Regulation 183/2005 introduced the concept of voluntary Community and national guides to good practice in feed production. Guidelines for the development of such Community guides to good practice have been prepared together with the Member States.

At present, the following Community guides to good practice have been already assessed according to Article 22 of the Regulation 183/2005:


Additional information on these guides can be found at:

In addition, and concerning in particular traceability, the provisions of Article 18 of Regulation (EC) 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety contains similar requirements to the Code. Details of the traceability aspects as well as information on this Regulation can be found at:

http://ec.europa.eu/food/food/foodlaw/traceability/index_en.htm

In addition to these measures, EU Member States have taken actions in relation with the implementation of the Codex Code in areas such as training sessions for farmers and feed manufacturers on good practices of animal feeding and GMP and HACCP for manufacturing feed and dissemination of detailed information leaflets and other materials on the different aspects of the Code of good animal feeding.
1. Experience by EU Member States

1.1. Czech Republic

During the last few months farmers and industrial producers of the Czech Republic were trained in the principles and philosophy of the Codex Code of Practice on Good Animal Feeding (in the final version CAC 54-2004). The trainings were organised by Agrarian Chamber, Association of Private Farmers of the Czech Republic and Bohemian-Moravian Association of Agricultural Supply and Purchasing Organisations (member of FEFAC). The main topics were Codex of principles of good practices on animal feeding for farmers and GMP and HACCP for manufacturers of premixtures and compound feed.

In 2007 the manual of good practice on feeding and breeding for farmers was published in cooperation of the Ministry of Agriculture, the Agrarian Chamber and the Research Institute for Animal Production. At the end of 2007 the Bohemian-Moravian Association of Agricultural Supply and Purchasing Organisations published a new large manual of good practices and HACCP principles for industrial producers. The requirements of this manual correspond with requirements laid down in the FEFAC Code “EFMC” mentioned above. The control of feed manufacturers with a view to keeping of HACCP system principles and good practices application is in process.

1.2. Germany

In addition to the Community legislation, Germany has developed national manuals for the implementation of the Regulation (EC) No 183/2005. These manuals are published at: http://www.bvl.bund.de/cln_007/nn_491320/DE/02__Futtermittel/05__FutternBetriebe/futtermittelBetriebe__node.html__nnn=true.

The Ministry of Food, Agriculture and Consumer Protection has published rules for development and evaluation of national guides to good practice according to Regulation (EC) No 183/2005.

Germany has published an orientation scheme with requirements for suitable quality of drinking water for animals as recommendation for farmers. This orientation scheme is published at: http://www.bmelv.de/cln_045/nn_753016/DE/07-SchutzderTiere/Futtermittelsicherheit/Orientierungsrahmen-Traenkewasser.html__nnn=true

1.3. Sweden

Sweden has not implemented the current Codex Code as such, since it is well reflected by the EU legislation.

Sweden has experienced that the most important trade obstacles are related to requirements in the field of contaminants/undesirable substances, feed hygiene, GMO and feed additives and in those areas there are gaps in the current Code on Good Animal Feeding.

1.4. United Kingdom

During the drafting of the Codex Code of Practice on Good Animal Feeding, the Food Standards Agency ensured that all interested parties in the UK were consulted and that their
views were sought on the scope and provisions to be included in the Code. The main methods by which the guidance in the Code have been adopted or promoted are set out on the following pages.

1.4.1. ACAF Review of on-farm feeding practices.

The Advisory Committee on Animal Feedingstuffs (ACAF) is an independent committee which advises the UK government on the safety and use of animal feeds and feeding practices, with particular emphasis on protecting human health and with reference to new technical developments. The Committee carried out a review of on-farm animal feeding practices and in September 2003 published its report containing recommendations on the identification of hazards and the minimization of risks associated with the use of feeds at farm level. During its review the Committee was made aware of the contents the draft Codex Code of Practice on Good Animal Feeding. The recommendations and advice in the Committee’s report reflects and supplements the provisions in Section 6 of the Codex Code, and is intended to assist farmers comply with the requirements of the EC Feed Hygiene Regulation (183/2005).

As the ACAF review reflects the basic guidance that is contained in the Codex Code, it has also been used as the basis to promote good practices on farm. The ACAF review also forms part of the study materials for officers enforcing feed hygiene legislation. (ACAF Report in http://www.food.gov.uk/multimedia/pdfs/farm.pdf)

1.4.2. Industry Codes

The Food Standards Agency has assisted the UK agriculture industry in developing a voluntary code of practice for use by farmers mixing or otherwise using feeds. The Assured Food Standards (AFS) Code of Practice for on farm Feeding was published in August 2006 (Ref http://www.redtractor.org.uk/download/rt_code_farm_feeding.pdf).

The AFS Code of Practice reflects provisions in the Codex Code of Practice on Good Animal Feeding, the ACAF Report (referred to above) and the provisions of EC Regulation 183/2005. AFS, a major farm food/feed industry assurance scheme requires is members to comply with the requirements of the Code of Practice for on-farm Feeding.

This AFS Code has been submitted to COPA/COGECA for that organisation to consider submitting it to the European Commission for recognition as a Community Guide under Article 22 of EC Regulation 183/2005.

The National Association of Agricultural Contractors (NAAC) has drawn up an assurance scheme for mobile feed mixers. (Ref: http://www.naac.co.uk/ALBC/AlbcFeed.aspx). The scheme’s requirements reflect, as appropriate, the provisions of the Codex Code and ACAF’s recommendations.

1.4.3. Publicity/Training on Good Animal Feeding

An eye-catching A3 poster containing key messages on good feeding practices has been produced and distributed to on-farm mixers and farming organisations throughout the UK. A copy of the poster is available.
In Great Britain (England, Scotland and Wales) legislation on the marketing and composition of animal feed is enforced by local authorities. In Northern Ireland the legislation is enforced by the Department of Agriculture and Rural Development. A programme of training courses is currently being delivered to enforcement officers to explain the requirements of the EC Feed Hygiene Regulation. This includes the requirements in relation to good animal feeding.

A video entitled ‘Feed for Thought’ was also produced and distributed to enforcement officers. This shows examples of good and bad on-farm feeding practices.

1.4.4. Legislative Measures

In addition to the Community legislation mentioned above, the UK has made national Regulations to enforce these Regulations and produced material to publicise the requirements of the legislation.

http://www.food.gov.uk/foodindustry/farmingfood/animalfeed/animalfeedlegislation

Article 20 of EC Regulation (EC) 183/2005 specifies that Member States should encourage, where necessary, the development of national guides to good practice to help feed business operators comply with the requirements of the Regulation. This includes the requirements of Annexes I-III. The Food Standards Agency has drawn-up and published guidelines for the development of national voluntary guides to good hygiene practice and the application of HACCP principles. (Ref: http://www.food.gov.uk/multimedia/pdfs/feednvgaugust07.pdf)

There are several assurance schemes managed by trade associations in the UK which provide assurance in the feed and food supply chains. These schemes were developed to help prevent major feed and food safety incidents and recognise consumer, industry, government and stakeholder requirements. Examples include: a) the Universal Feed Assurance Scheme (UFAS) which covers the production, selling and haulage of compound feeds and feed materials to farms; b) the Trade Assurance Scheme for Combinable Crops (TASCC) which provides advice on the handling of grains, pulses and animal feed, materials in the supply chain beyond the farm gate; and c) the Feed Materials Assurance Scheme (FEMAS) which covers the supply of feed materials from the vast array of supply sources to their point of use.

2. Examples of additional voluntary guides to good hygienic practice relating to feed and animal production in Member States

The following are some examples of additional voluntary guides of good hygienic practices existing at present in several Member States:

2.5.1. Belgium

2.5.1.1. Feed

2.5.2. Czech Republic

2.5.2.1. Medicated Feedingstuffs

2.5.3. Denmark

2.5.3.1 Farms

2.5.3.2. Transport of feed

2.5.4. Finland

2.5.4.1 Cereals
2.5.4.1.1. Viljan hyvät tuotanto- ja varastointitavat (Guide to Good Practise for the production and storing of grains). Ref: Vilja-alan yhteistyöryhmä 2006.

2.5.4.1.2. Viljelytekniset toimenpiteet hometoksiiiniriskin pienentämiseksi (Cultivation techniques in reducing risks for mycotoxins). Ref: Vilja-alan yhteistyöryhmä/Turvallisuustyöryhmä 2007

2.5.4.2 Feed industry code
Hyvä teollisen rehunvalmistuksen toimintatavat -ohjeisto ja rehuteollisuuden HACCP -ohjeisto (Finnish feed manufactures code and HACCP. This code is prepared by the industry and awaiting for the assessment by the Finnish authorities.

2.5.5. France

All guides below were prepared by the industry and are awaiting validation by the French authorities.

2.5.5.1. Compound feed
Guide de bonnes pratiques d'hygiène de la fabrication d'aliments composes pour animaux (Guide for Good Hygiene Practice for compound feed). Ref; Syndicat National des Industries de la Nutrition Animale(SNIA) et COOP de France

2.5.5.2. Mineral feed
Guide de bonnes pratiques d'hygiène de la fabrication d'aliments minéraux pour animaux (Guide for Good Hygiene practice for mineral feed). Ref: Association Française de compléments pour l'Alimentation Animale).

2.5.5.3. Premixtures
Guide de bonnes pratiques pour la fabrication d'aliments pour animaux (Guide for Good Hygiene Practice for premixtures). Ref: SNIA COOP de France - Nutrition animale, AFCA-CIAL.

2.5.5.4. Ruminants
Guide de bonnes pratiques d'hygiène en élevage de ruminants (Guide for good Hygiene Practice for ruminants livestock). Ref: Confédération National de l'élevage (CNE)

2.5.5.5. Pigs
Guide de bonnes pratiques d'hygiène en élevage de porcs (Guide for Good Hygiene Practice for pigs livestock). Ref: Institut du Porc (IFIP).

2.5.6. Germany

2.5.6.1. Handling and storage of grain, feed and oilseeds
Leitlinie “Umschlag und Lagerung von Getreide, Futtermitteln und Ölsaaten” (Guide to good practice of handling and storage of grain, feed and oilseeds) Ref: www.zds-seehaefen.de/information

2.5.7. Lithuania

2.5.7.1. Milling production

2.5.8. The Netherlands

2.5.8.1. Cereals, seeds and vegetables

2.5.9. Slovakia

2.5.9.1. Feed
In January 2006 the Code of Slovak Feed Producers was published in Bulletin of the Ministry of Agriculture. The document corresponds with the requirements laid down in the FEFAC Code of European Feed Manufacturers Code and HACCP Codex Alimentarius manuals. The national code was prepared by the Association of Feed Manufacturers, Storage Units and Business Companies Zvaz krmiv, skladovatelor a obchodnych spolocnosti -
www.zvazpolnonakupu.sk. A workshop on good manufacture practice principles and HACCP for feed producers is being prepared. Ref: Križna 52, 821 08, Bratislava, Nov-05., www.zvazpolnonakupu.sk

2.5.10 Spain

2.5.10.1. Laying Hens


2.5.11. Sweden

In Sweden it has been introduced, by the associations in cooperation with the Competent Authority, voluntary guides to good hygienic practice in the primary dairy milk production (on-farm feeding practices) and almost finished are guides on the trade and processing of feed materials (industrial codes).