EUROPEAN COMMUNITY COMMENTS ON

Codex Circular CL 2001/36-AF

Preparation for Task Force on Good Animal Feeding

The European Community would like to thank the drafting group led by the United Kingdom for the progress made in preparing this document. The European Community is generally satisfied with the proposed text, but there are some particular areas of concern which it feels need to be addressed in the document, namely:

- authorisation and labelling of genetically modified organisms (GMOs);
- establishment of a negative list of feed ingredients that must be banned in animal nutrition;
- status of veterinary medicines in this Code;
- implementation of GMP and HACCP at processing and farm level;
- requirements regarding labelling and traceability.

SECTION 1. INTRODUCTION

The following should be inserted in the second line after the words “animal health”:

“animal welfare”.

COMMENT: Issues relating to animal welfare should also be taken into consideration in order to minimise health risks to consumers.

2. - COMMENTS ON SECTION 2. PURPOSE AND SCOPE

The second paragraph should be replaced by the following:

“While recognising that, in its totality, a feed safety system would address animal health, animal welfare and environmental issues, in addition to consumer health, this Code of Practice, in fulfilling the Codex mandate of consumer protection, only addresses food safety. Notwithstanding this, best efforts have been made to ensure that the recommendations and practices in this Code of Practice will not be detrimental to the more general animal health, animal welfare and environmental aspects of animal feeding.”

COMMENT: The European Community proposes that the Task Force address issues relating to animal health, animal welfare and the environment with a view to detailed consideration by the Codex Committee on General Principles. Animal health, animal welfare and the
environment should be regarded as legitimate factors to be taken into consideration in the context of animal nutrition.

SECTION 4. GENERAL PRINCIPLES AND REQUIREMENTS

Point 4.1:- The title should be amended to read as follows:

“FEED AND FEED INGREDIENTS”

Point 4.1: The following paragraph should be added:

“Feed or feed ingredients consisting of or containing GMOs, or produced from GMOs, should be approved by the national authorities.”

Point 4.1:

- The European Community strongly believes that the Task Force should draw up a list, at international level, of feed ingredients that are banned in animal nutrition. This is crucial for the effective implementation of this code at international level. The European Community is particularly concerned about the possible use of certain ingredients that pose a risk to human health, such as mammalian protein in ruminants, urine, faeces or treated seeds.

- For countries wishing to draw up a positive list of ingredients (non-additives), appropriate criteria should be considered within the framework of the Task Force.

Point 4.2: All indents in this section are replaced by the following:

“– information about the species or category of animals for which the feed is intended, and its purpose;
– a full list of feed ingredients, including appropriate reference to additives, indicating where applicable the exact percentages with a tolerance level;
– trade name, where appropriate;
– the name and address of the producer or intermediates;
– registration or approval number of the feed businesses operator, if applicable;
– nutrition profile;
– directions and precautions for use and storage;
– lot identification;
– manufacturing date, and
– use-before or expiry date

Feed and feed ingredients consisting of, containing or produced from GMOs should be labelled with references to genetic modification.”

COMMENT:

- The first and second indents could be combined in order to simplify the layout.
- It should be possible to indicate the quantitative composition of the feed with a tolerance level, if applicable, in one member country. The same should apply as regards identifying the business operator.
Point 4.3: The first paragraph should be replaced by the following:

“Traceability of feed and feed ingredients, should be ensured through proper labelling and record keeping at all stages of production and distribution. This should facilitate the prompt trace-back or trace-forward of materials and products if any actual or potential health risks are identified, and prompt and complete withdrawal or recall of products where necessary. Records should be maintained and readily available regarding the production, distribution and use of feeds and feed ingredients for as long as appropriate to enable trace-back should a safety problem emerge, and representative samples of feed ingredients and feed produced should be kept for a suitable period of time if analysis becomes necessary.”

COMMENT:
- In the first line it is not necessary to refer to “additives” because the term “ingredients” already includes them.
- For the purposes of control and traceability, samples of feed ingredients and batches produced by the feed establishments should be kept for analysis, if necessary. This is a normal practice in the feed industry that should be incorporated into the code.

Point 4.4: The entire section should be replaced by the following:

“Feed and feed ingredient manufacturers, and other relevant parties in the feed chain, should practice self-regulation/auto-control to ensure compliance with required standards of production, storage and transport. It will be necessary for official competent authorities or delegated bodies (which have been officially authorised) to establish official regulatory programmes to check that feed and feed ingredients are produced, distributed and used in such a way that foods of animal origin intended for human consumption are both safe and wholesome. Inspection and control procedures should be used to help ensure that feeds meet requirements in order to protect consumers. The inspection system should be designed and operated on the basis of objective risk assessment appropriate to the circumstances\(^1\). The risk assessment methodology employed should preferably be consistent with internationally accepted approaches. Risk assessment should be based on current available scientific evidence.

Monitoring of feeds and feed ingredients should include inspection and sampling and analysis to detect unacceptable levels of undesirable substances and should be inspected, supervised and controlled by official inspection bodies or delegated bodies.”

COMMENT: The primary responsibility for ensuring food safety lies with companies and/or industry organisations via their own checks and controls. However, it is necessary for governments to have inspection procedures too. Inspection and control procedures may be applied either by the competent authority itself or another body which has been officially recognised.

Points 5.4.1, 5.4.2 and 5.4.3: References to points 5.4.1, 5.4.2 and 5.4.3 should be replaced by references to 4.5.1, 4.5.2 and 4.5.3 respectively.

Point 4.5: The first sentence should be deleted. This sentence is worthy but bland.

Point 4.5: See comments on 4.1 as regards the negative and positive lists of feed ingredients.

Point 5.4.1: All paragraphs in this section should be replaced by the following:

“Feed additives should be assessed for safety and used under stated conditions of use as pre-approved by national or international authorities. All feed additives should be received, handled and stored to maintain their integrity and to minimise misuse or unsafe contamination. Feed containing them should be used in strict accordance with clearly defined instructions for use.

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. Dividing-lines between feed additives and veterinary medicines must be clearly laid down in order to avoid misuse.

Antibiotics should not be used for growth promoting purposes.

For purposes other than growth promoters, antibiotics should not be used, in the absence of public health safety assessment. COMMENT: Although a reference to veterinary medicines could be accepted in this Code, the European Community would like to draw attention to the fact that the CODEX Committee of Residues of Veterinary Drugs in Foods has set out a “Recommended International Code of Practice for the Control of the Use of Veterinary Drugs”. This Code sets out guidelines on the prescription, application, distribution and control of drugs used for treating animals, preserving animal health or improving animal production. Veterinary products (including premixes for manufacture of medicated feedingstuffs) used in food-producing animals fall within the scope of this Code.

Point 5.4.2: The first sentence of this section should be replaced by the following:

“Feed and feed ingredients should be produced, marketed, used and stored under hygienic conditions. They should only be produced, marketed, used or stored if they are safe and wholesome and do not pose a danger to animal and human health or the environment.

In particular, feeds and feed ingredients contaminated with undesirable substances or pathogen microbes in excess of established national or international maximum levels should not be marketed or used.”

Point 5.4.3: This section should be replaced by the following:

“The presence in feed and feed ingredients of undesirable substances such as industrial and environmental contaminants, pesticides, radionuclides, persistent organic pollutants or microbial toxins, including mycotoxins, should be identified, controlled and kept to levels as low as can reasonably be achieved (ALARA). The risks of each undesirable substance to human and animal health should be assessed, which in turn may lead to the setting of maximum limits for feeds and feed ingredients or the prohibition of certain materials from animal feed.”

2 CAC/RCP 38-1993
3 WHO Global Principles for the Containment of Antimicrobial Resistance in Animals Intended for Food, June 2000, Geneva Switzerland.”
COMMENT:
- According to the definition of undesirable substances, “pathogenic microbes” are not included within its scope and should therefore be excluded.
- The ALARA principle seems appropriate here as it is widely used in food legislation.

SECTION 5. INDUSTRIAL PRODUCTION AND TRANSPORT OF ANIMAL FEEDINGSTUFFS.

The title of this section should be replaced by the following:

“INDUSTRIAL PRODUCTION TRANSPORT AND STORAGE OF ANIMAL FEEDINGSTUFFS”.

COMMENT: Aspects relating to transport are included in and relevant to this section, and the title should reflect this.

Section 5, first paragraph, third line: The following should be added after the word “manufactured”:

“or stored”.

Section 5, paragraph 1: This should be replaced by the following:

1. Buildings and equipment used to process feed and feed ingredients are constructed in a manner that permits ease of operation, maintenance and cleaning and prevent feed contamination. Process flow within the manufacturing facility should also be designed to avoid such potential;

Section 5, paragraph 11: This should be replaced by the following:

“11. Manufacturing strategies are used to prevent cross-contamination (for example by flushing, sequencing and physical clean-out) between batches of feed containing restricted or otherwise potentially harmful materials (such as certain animal by-product meals or additives). These procedures should also be used to prevent cross-contamination between medicated and non-medicated feeds. In cases where the risk linked to cross-contamination is high, completely separate production lines, and storage and transport, should be introduced;”

Section 5, a new paragraph should be added after paragraph 19:

“20.- Feed processing plants, storage facilities, and means of transport must be cleaned and disinfected as often as necessary to avoid the presence of insects and rodents. “

SECTION 7 METHODS OF ANALYSIS AND SAMPLING

The entire section should be replaced by the following:
7.1 National Feed Control authorities should define and use official rules for sampling procedures based on Codex sampling plans for the particular commodity/contaminant combination where available. In the absence of such rules, relevant methods of sampling as elaborated by international organisations, such as the International Standards Organisation (ISO), the European Committee for Standardisation (CEN) and AOAC International should be used. It is important to ensure that the sample taken is representative of the consignment or of the lot.  

7.2 Where samples are selected for analysis, standard methods of analysis or methods validated through appropriate protocols should be used. Official methods of analysis based on Codex principles and elaborated by the competent authorities should be used. In the absence of such methods, relevant methods elaborated by international organisations should be used. These include the ISO, CEN and AOAC International. Where no appropriate international analytical standard exists, other scientifically recognised rules can be used. The method selected should also be chosen on the basis of practicability, with preference given to those methods which are applicable for routine use, and of reliability. Analyses should be carried out in official or officially accredited laboratories which employ Good Laboratory Practice.  

COMMENT: Many countries have adopted official methods for sampling and analysis based on international principles that should be considered as the first option. This does not rule out the possibility that ISO, CEN or AOAC rules may apply in the absence of official methods.