

Ad-Hoc Intergovernmental Codex Task Force on Animal Feeding
(6th Session)

Berne, Switzerland, 20-24 February 2012

**European Union comments on the
Revised document
Proposed draft guidelines on application of risks assessment for feed**

(Agenda Item 4, CX/AF 12/6/4 Add.2)

***European Union Competence
European Union Vote***

The European Union (EU) would like to congratulate Switzerland for the excellent work with the revised document which substantially clarifies many aspects of the discussion and takes into account the different comments sent. The EU would like to submit the following comments to the revised document. The previous EU comments on the first version of the document are to be considered still valid.

Specific comments

The EU comments below are listed according to the paragraphs and the headings used in the Codex draft document.

Throughout the document it is itself referred as guideline, guidelines and guidance. It should be preferably used a single wording such as guideline.

Heading: definitions

Definition of feed. The EU would like the definition of feed to be consistent with the definition in the Codex code of Good Animal Feeding.

The additional sentence added ("in this guideline includes water") should be deleted. Water for drinking could be mentioned as such wherever in the document this is relevant.

Point 18. The guidelines are addressed to national governments and therefore the last sentence of this paragraph concerning the participation of experts from different parts of the world is not relevant and should be deleted.

Heading: Risk assessment in the Codex Risk analysis framework

Heading: Hazard identification

Point 22. The EU would propose the following alternative wording:

Hazards in feed can include biological agents (viruses, bacteria, endoparasites and prions), chemical substances (such as “heavy metals”, dioxins, excessive levels of pesticides, veterinary drugs and additives), radionuclides and other undesirable substances.

The definition of undesirable substances from the Code of Good Animal Feeding should be included in the list of definitions in the corresponding section.

Point 34. Besides the hazard level in feed it is necessary to know the intake of feed by the animal and the duration of the intake.

The fate of the hazard in the animal should be more clearly considered. The suggestion by Canada in Document CX/AF/12/6/4 Add 1 to consider taking elements of the relevant section of the FAO/WHO Expert meeting of 2007 may be useful in this regard.

Point 35. The references to the concepts of pKa/pKb and log Kow should be explained further if included.

Point 38. The EU would prefer to delete the reference to animal fats in brackets because there is no reason to single out animal fats as a specific example.

Point 41. The term “output” could be replaced with the term “format of the output”.
