

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 prioritised list of hazards in feed
(Agenda Item 5, CX/AF 12/6/5 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 this revised document. Many of the previous EU comments on the first version of the document are to be considered still valid.

(i) General comments

The EU welcomes that the revised document expands the section on the criteria for prioritizing hazards, as requested in the terms of reference.

The section on the potential feed hazards in this revised document presents the series of factors and criteria in more condensed and general terms than the previous version. In its present state it does not seem very clear in providing advice on developing a prioritised list of hazards. The EU considers that it is worth considering how best to fulfill more completely the terms of reference given to the Task Force, i.e. *to develop a prioritised list of hazards in feed ingredients and feed additives for governmental use. The list should contain hazards of international relevance that are reasonably likely to occur, and are thus likely to warrant future attention.* The EU concurs with Canada that this document could represent a significant step in helping identifying relevant hazards in animal feed and serve as an important tool in the development of a prioritised list of hazards.

(ii) Specific comments

Table of contents

The references to the tables 1, 2, and 3 are not clear and the page numbers not included.

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 it is relevant.

The definition of "processing aid" in page 6 which is the standard in Codex could be adapted in this case to the situation in feed by replacing the word "food" with "feed".

Definition of contaminants. The final sentence regarding its applicability should read "For the purposes of this document the term food in the definition of contaminant should be taken as referring to "feed and food".

Heading: Relevance to human health

Point 16. 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 22. The references to the concepts of pKa/pKb and log Kow should be more explained if included.

Point 29. It should be clarified that the "appended tabulated summaries" mentioned in the second sentence refer presumably to both the two Tables 1 and 2.

Point 33. It states that the list is not exhaustive. Therefore, "The following are examples only" in point 70 should be deleted, because it is valid for all the other paragraphs in between.

Point 35. Salmonella. The EU would suggest to delete the last sentence. Justification: a wide range of serotypes frequently cause diseases in humans and thus are of public health significance. Although some serotypes are rarely reported in human cases, all the serotypes may be regarded as a hazard for public health.

Point 41 states that the risk of virus can be minimized by respecting good food hygienic practice (last sentence). This is valid for other hazards also and should be mentioned there too, or should be included in a general statement in point 33.

Point 59. From the second sentence onwards, the text could be replaced with: Dioxins in feed may arise by contamination, for example roughages and pasture exposed to combustion sources (e.g waste incineration plants, fossil fuel power stations, bush fires, exhaust gases), feed ingredients subject to a direct fuel combustion drying process, food co- and by-products (such as fish meal and fish oils) from contaminated environments. Dioxins may also arise in mineral feeds, such as clays, recuperated copper sulphate, zinc oxide.

Point 62, last indent: It is a little difficult to connect the Terms of reference of CCFA with "Residues of feed additives and other residues of certain processing aids".

Point 72. Figure 2 should have attached a more detailed explanation regarding its connection with Tables 1 and 2 and how it would work in practice. What is the relationship between the boxes in the figure? Is there a sequence of flow in the figure? Should there not be arrows in that case?

The factors and the criteria used in the figure could be better separated, as there is no distinction among them in the figure.

Heading: Table 1: factors affecting occurrence of hazards in feed and feed ingredients

Row "plant feed or feed ingredient". It should be clarified why the words "pathogenic bacteria" are put in brackets.

Column "feed or feed ingredient".

There may be feed ingredients which do not fall under any of the subheadings foreseen of plant origin, of (terrestrial or aquatic) animal origin, of mineral origin or from fermentation origin, such as synthetic products. An explanation such as "Feed or feed ingredients of none of these origins are not considered" could be mentioned.

Column "Risk Factor":

- The term cross-contamination is mentioned in three places. If both the new definitions of cross-contamination and the one on carry-over are maintained, this latter term carry-over should also be added in this table.
- In the row "Fat/oil", "manufacturing" should be added.

Row "plant feed or feed ingredient". The fourth sub-row under the column "risk factor", "Treatment to eliminate toxins or for conservation" is not a risk factor but on the contrary results in a reduction of the risk. Therefore, this sub-row should be deleted.

Row "land animal and milk products". Possibly it is meant "land animal products and derived products".

Row risk factor "livestock conditions". Under the column hazard the items: "residues of veterinary drugs, heavy metals, residues of feed additives" should be added.

Row risk factor "Condition of storage,...". The term cross contamination should be added in the brackets for transport and under the column hazard prions, viruses and endoparasites should be added.

In addition, the three risk factors in the second column are related to these products and therefore the cells of the table in the first column should be merged (separating lines to be deleted).

Table 1, row "fish, other marine animals". May be it should be "aquatic animals" instead of "marine animals", as there are also fresh water animals.

In addition, the three risk factors in the second column are related to these products and therefore the cells of the table in the first column should be merged (separating lines to be deleted).

Table 1, row Minerals: Authorization is mentioned as a risk factor. This should be clarified.

Heading: Table 2: Factors affecting occurrence of hazards in edible products

The second column "feed sources and risk factors" is not very clear as it puts together the two concepts. Possibly the sources and the factors could be better separated in two different columns.

Row mycotoxins. They can also appear in kidney and therefore this should be added in the column edible products.

Row "Other alkaloids". Botanical impurities can also occur in grains and not only in forages and therefore "grains" could be added in the second column.

Rows "dioxins" and "veterinary drug, pesticide, processing aid residues". Under the column "edible products" fatty fish and products should be added.

Row "dioxins". The use of a chemical step process could have a concentrating effect so this factor could also be added.

Row "organochlorine pesticides", the edible products should be the same as for dioxins.

Row "veterinary drug, pesticide, processing aid residues" should be completed with feed additive residues.

The sorting of the rows concerning the chemical hazards in this table could be reconsidered as the criteria used in their sorting is not clear.