



FEFAC

# Implementation of the FEFAC Feed safety action plan

# Overview of the presentation

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- I. Introduction to FEFAC
- II. Establishment and review of the EFMC
- III. Implementation of the EMFC: does it work in practice?
- IV. Future feed safety challenges



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# FEFAC introduction



# National Associations joining FEAC

## Active Members

VFÖ	Austria	1995 (1964)
APFACA/BEMEFA	Belgium	1959
CFA	Cyprus	2004 (2003)
CMSOZZN	Czech Republic	2004 (2000)
DAKOFO	Denmark	1973
FFDIF	Finland	1995 (1993)
SNIA	France	1959
DVT	Germany	1959
SEVIZ	Greece	1989
ASSALZOO	Italy	1959
IGFA	Ireland	1973
LGPA	Lithuania	2005
NEVEDI	The Netherlands	1959
IZP	Poland	2004 (2001)
IACA	Portugal	1986 (1976)
AFPWTC	Slovakia	2004 (2003)
GZS	Slovenia	2004
CESFAC	Spain	1986
FS	Sweden	1995
LANTMÄNNEN	Sweden	1995
AIC	United Kingdom	1973

(observer as from ...)

## Observer Members

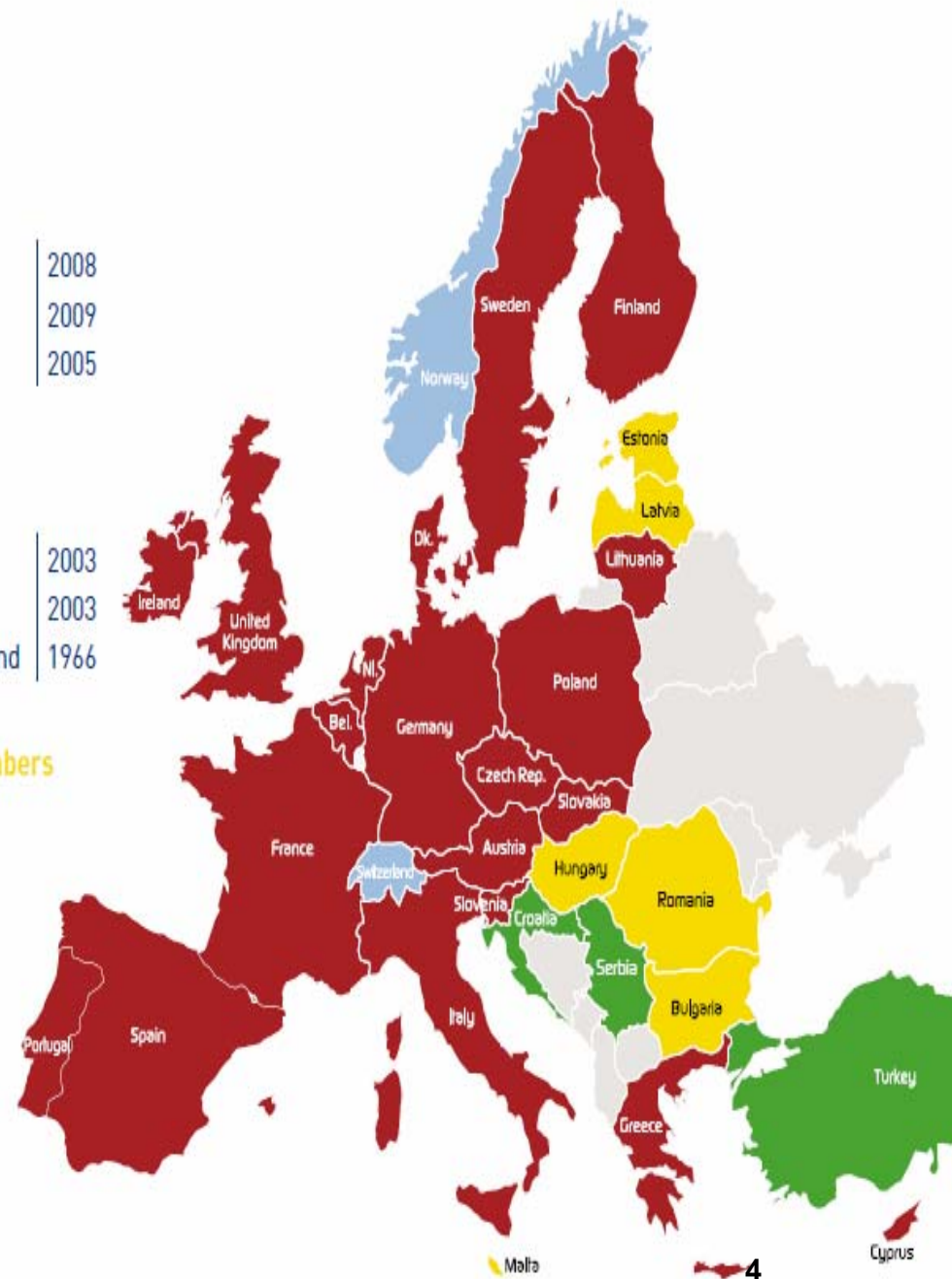
CFIA	Croatia	2008
SFMA	Serbia	2009
TURKIYEM	Turkey	2005

## Associate Members

EMFEMA		2003
FHL	Norway	2003
VSF	Switzerland	1966

## Potential Active Members

Bulgaria
Estonia
Hungary
Latvia
Malta
Romania



# FEFAC committees

## **Animal nutrition**

Chairman: K. Larsson (SLR)

Vice-Chair: P. Radewahn (DVT)

## **Industrial compound feed production**

Chairman: A. Sebastia (CESFAC)

Vice-Chair: J. Piçarra (IACA)

## **Milk replacers**

Chairman: G. Kleinhout (SNIA)

Vice-Chair: H. Boeve (NEVEDI)

## **Premix and mineral feed**

Chairman: R. Sijtsma (NEVEDI)

Vice-Chair: J.F. Labarre (SNIA)

## **Fish feed**

Chairman: A. Allodi (ASSALZOO)

Vice-Chair: K. T. Maeland (FHL)

## **EFMC**

Chairman: S. Ferrari (ASSALZOO)

Vice-Chair: Y. Dejaegher (BEMEFA)

# Role of FEFAC – long term lobbying and communication strategy

## Food & feed safety

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<b>Objective</b>	Continuous move to pro-active position through comprehensive and consistent communication strategy at European/national level with objective to promote the feed industry's image in a positive manner to stakeholders
<b>Problem</b>	The prevailing negative image of the feed industry in public opinion and at the level of EU decision-makers means that the EU legislator may continue to impose stricter rules on industrial feed compared to food production
<b>FEFAC lobby approach</b>	<b>Implementation and further upgrading of the EFMC guide for compound feed, premixes and medicated feed as key communication tool</b> Promotion of new Feed Hygiene Regulation Maintain formal consultation status at EU level for any future feed safety related EU legislation initiative Ensure effective international representation via IFIF and contribution to int. organisations like Codex Alimentarius, FAO/WHO/WTO and OIE dealing with global harmonisation of feed safety standards
<b>Action</b>	<b>Fastest possible adoption of core EFMC principles and distribution to feed ingredient suppliers; recognition by stakeholders</b>

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# Establishment and review of the EFMC



# The EFMC ....

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- Is the first Community guide to good practice for the EU industrial compound feed and premixtures manufacturing sector for food-producing animals
- Meets the demands of EU Feed/Food legislation harmonisation (Jan. 2006, Feed Hygiene Reg. (EC) No 1831/2003)
- Only covers safety related issues
- Help ensure safety of food through adherence to good Manufacturing practice during purchase, handling, storage, processing and distribution of feed for food producing animals

# The EFMC ...

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- Covers all stages for manufacturing of premixtures, compound feedingstuffs and medicated feed from intake of feed ingredients to distribution of final products
- Provides practical information for benchmarking of Codes of Practice to facilitate mutual recognition of national Codes of Practice
- Ensures that coexistence of nationally developed Quality Assurance Systems does not lead to unjustified EU trade barriers

# European Feed Manufacturers Guide

## Key points

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- Building up an HACCP-based QA system all along the feed chain:
  - Scope
  - Full traceability
  - Recall procedure
  - Sourcing of feed materials
  - System certified by an independent body
- Making sure that all operators in the feed chain are under control (role of the legislator)
- Collaboration with downstream partners
- Collaboration with upstream partners

# Development of the European Feed Manufacturers Code (EFMC)

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- **November 2005** – Public launch event of EFMC with participation of European Commission (DG SANCO)
- **April/May 2006** – Preliminary report from Standing Committee on the Food Chain and Animal Health
- **January 2007** – EFMC positive assessment by Standing Committee
- **March 2007** – Publication of the EFMC in the OJ C 64 (2007)
- **As from November 2007** – Ongoing review of the EFMC along the principles and views presented by the Standing Committee experts

<b>Country (association)</b>	<b>Scope of national scheme *</b>	<b>Accreditation possible</b>	<b>Certification system available</b>	<b>Governmental endorsement</b>
<b>Austria (VFÖ)</b>	<b>M</b>			<b>YES</b>
<b>Belgium (OVOCOM)</b>	<b>PM, RM, M, T, FA</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>
<b>Croatia (CFIA)</b>	<b>M, PM</b>			
<b>Cyprus (CFA)</b>				
<b>Czech Republic (CSMO ZZN)</b>	<b>PM, M</b>			<b>YES</b>
<b>Denmark (DAKOFO)</b>	<b>M</b>			<b>Yes</b>
<b>Finland (FFDIF)</b>	<b>M</b>			
<b>France (SNIA/SYNCO PAC)</b>	<b>M</b>			<b>YES</b>
<b>Germany (QS)</b>	<b>M, T, RM</b>	<b>YES</b>	<b>YES</b>	<b>YES</b>
<b>Ireland (IGFA) – integration of UK's code</b>	<b>M, PM, RM, T</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>
<b>Italy (ASSALZOO)</b>	<b>M, PM, T</b>	<b>NO</b>	<b>March 2008</b>	<b>YES</b>

\* M = Feed manufacturing PM = Pre-mixtures RM = Raw materials T= Transport FA = Feed additives

<b>Country (association)</b>	<b>Scope of national scheme *</b>	<b>Accreditation possible</b>	<b>Certification system available</b>	<b>Governmental endorsement</b>
<b>Lithuania (LGPA)</b>				
<b>Luxembourg (OVOCOM)</b>	PM, M, T	YES	YES	
<b>Netherlands (PDV)</b>	RM, PM, M, T	YES	YES	YES
<b>Poland (IZBA Gospodarcza)</b>	M			
<b>Portugal (IACA)</b>	PM, M			YES
<b>Slovakia (AFPWTC)</b>	M			YES
<b>Slovenia (GZS)</b>	M			YES
<b>Spain (CESFAC)</b>	PM, M	YES	YES	YES
<b>Sweden</b>	Code not requested at the moment	–	–	–
<b>Switzerland</b>	M, PM, RM, T	YES		YES
<b>United Kingdom (AIC)</b>	M, PM, RM, T	YES	YES	YES

# Hygiene requirements for the manufacturing of medicated feed: 2 sets of legal provisions

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- Feed Hygiene Regulation (EC) No 1831/2003:
  - Regulation covering ...
  - common feed safety/hygiene requirements, with ...
  - voluntary ...
  - European / national...
  - Guides to good practice
- Medicated Feed Directive 90/167/EEC:
  - Directive covering ...
  - medicated feed, with ...
  - mandatory compliance with ...
  - national ...
  - Good Practice rules

# Principles of the new EFMC version regarding medicated feed

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- Introduction:
  - Medicated feed is a feed (ref. to summary record of the Veterinary Pharmaceutical Committee – 20 March 2007)
  - National codes of practice take precedence over EFMC
- Core part of EFMC:
  - Withdrawal of all references to medicated feed from the previous version of the core part of EFMC
- New Annex 1: Sector note medicated feed
  - Development of a specific annex mirroring the structure of the EFMC and providing specific requirements for medicated feed

# Sector note on medicated feed: key principles

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- Based on existing national good practices for medicated feed
- In case provisions in national implementing rules are significantly divergent or the Directive leaves it to MS to derogate from basic rules, the wording of the Directive was used, e.g.:
  - Derogation for intermediate products,
  - Storage of medicated feed and premixtures,
  - Derogation for manufacturing before emission of a prescription,
  - Period of validity of the prescription (max 3 months),
  - Derogation for medicated feed produced from several medicated premixtures,
  - Rules for medicated feed for placing on the market of another MS,
  - Period of record keeping (at least three years),
  - Derogation for delivery via retailers,
  - Transport of medicated feed

# Further EFMC developments on Standing Committee request

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- **Practical examples of HACCP** in feed production
- Reference to the **responsibilities of feed business operators** in terms of general requirements of food law
- **Risk-based analysis of best practice** to ensure effective tracing of products
- **Other hazards**, such as fertilisers and plant protection products

# FEFAC approach on the future EFMC developments (1)

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- application of HACCP principles
  - Reviewed section A of EFMC and suggest producing a separate Guide to assist operators in applying a HACCP system
  - Suggest detailing principles and not examples
  - Operators must apply the principles to every different application
  - Training is the key to successful HACCP

# FEFAC approach on the future EFMC developments (2)

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- Responsibilities of feed business operators
  - Inclusion in the introduction of the Guide, of an explicit reference to the General Food Law guidance document and in particular on article 17 dedicated to the responsibilities of Feed Business Operators
  - Believe that a Code of Practice should not repeat the law (but require compliance to it)

# FEFAC approach on the future EFMC developments (3)

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- Risk-based analysis of best practice to ensure effective tracing of products
  - EFMC already requires product traceability
  - HACCP deals with cross contamination
  - Internal traceability provisions in the EFMC should be further improved
  - Specific requirements will be added to each relevant chapter of EFMC

# FEFAC approach on the future EFMC developments (4)

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- Other hazards, such as fertilisers and plant protection products
  - EFMC Requires
    - Raw Material Approval
    - Raw Material Supplier Evaluation
    - Raw Material Checking at Intake
    - HACCP
  - Together these requirements should address “other hazards” (pesticides mentioned in guidance for HACCP)



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# Implementation of the EFMC: does it work in practice?

# Contamination incidents

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- 1998 - Dioxins in citrus pulp pellets - Brazil
- 1999 - PCBs in feed fats - Belgium
- 1999 - Dioxins in kaolinitic clays and dried fodder - Germany
- 2000 - Dioxins in choline chloride - Spain
- 2002 - Dioxins in carbosan copper - USA
- 2002 - Chloramphenicol in skimmed milk powder - Russia and Ukraine
- 2002 - MPA hormones in glucose syrup – Ireland
- 2002 - Nitrofen in wheatfeed – Germany
- 2003 - Dioxins in dried grass pellets - Germany
- 2004 - Dioxins in potato pulp - The Netherlands
- 2004 – Bone fragments in EU sugar beet pulp & USA maize products
- 2006 - Cadmium in zinc sulphate - China
- 2007 - Melamine in wheat and maize gluten feed – China
- 2008 – Monensin in dried deactivated yeast, Brazil
- 2008 - Melamine in organic soya expeller – China
- 2008 - Dioxins in breadmeal - Ireland

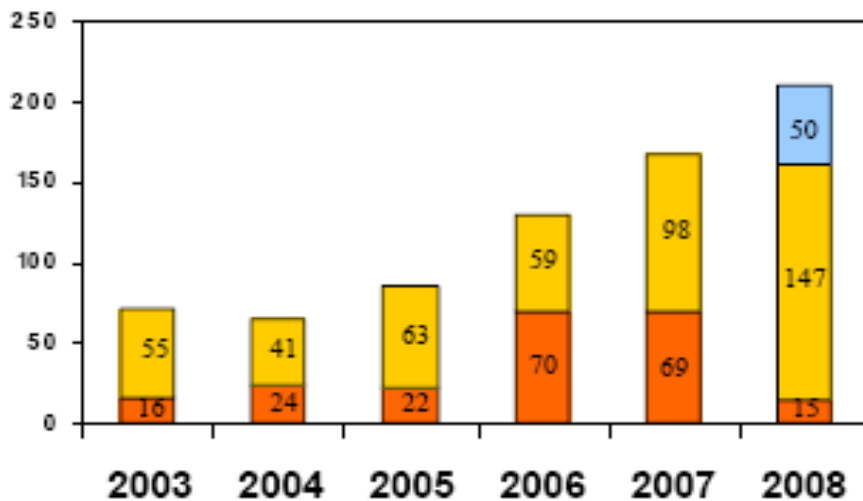
# Rapid Alert System for Food and Feed in 2008

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- **Constant increase of notifications** for feed in general (+20.8%) with a **relatively low number of alerts** (15);
- Presence of **salmonella in feed materials** remains in statistical terms the **most frequent incident** in 2008 with 81 notifications;
- Presence of **prohibited substances** (melamine from China and monensin from Brazil) constitute the **two key incidents** of the year;
- the **dioxin/PCB contamination** of pigmeat and beef in Ireland, although linked to feed (bread meal), triggered notifications for animal products but not for feed and is therefore **not accounted in the feed notifications**;
- Presence of **cadmium and lead** in feed materials or in feed additives still represents a **recurrent issue**.

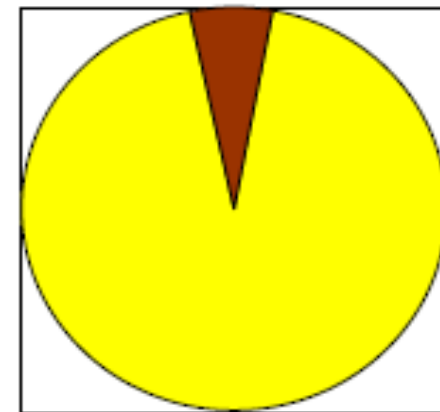
# Rapid Alert System for Food and Feed in 2008

Overview on the notifications from 2003 to 2008



- Alert notifications
- Information notifications
- Border rejections

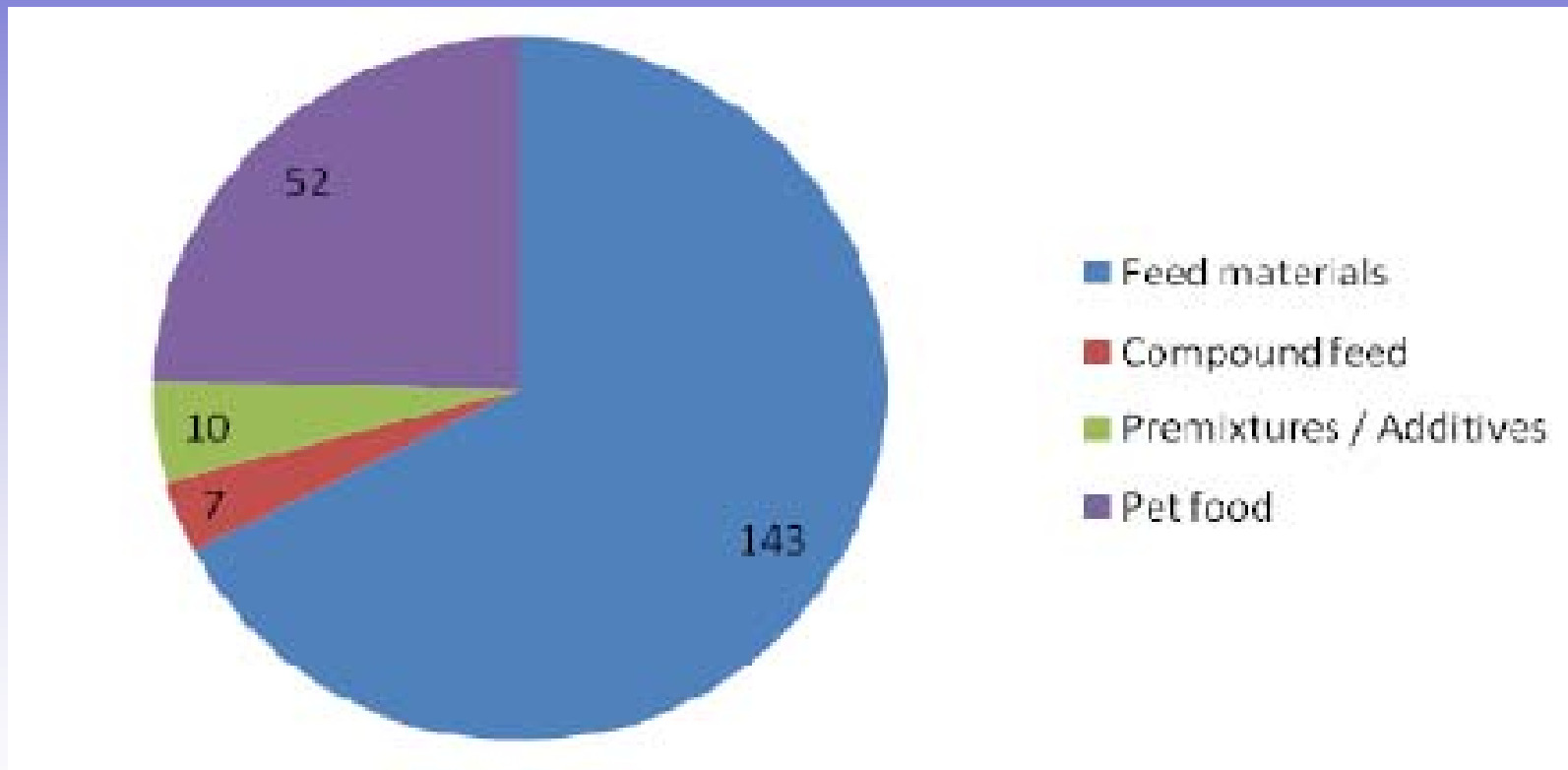
Notifications in 2008



- Feed = 212 → 6.82 %
- Food = 3104 → 93.18%

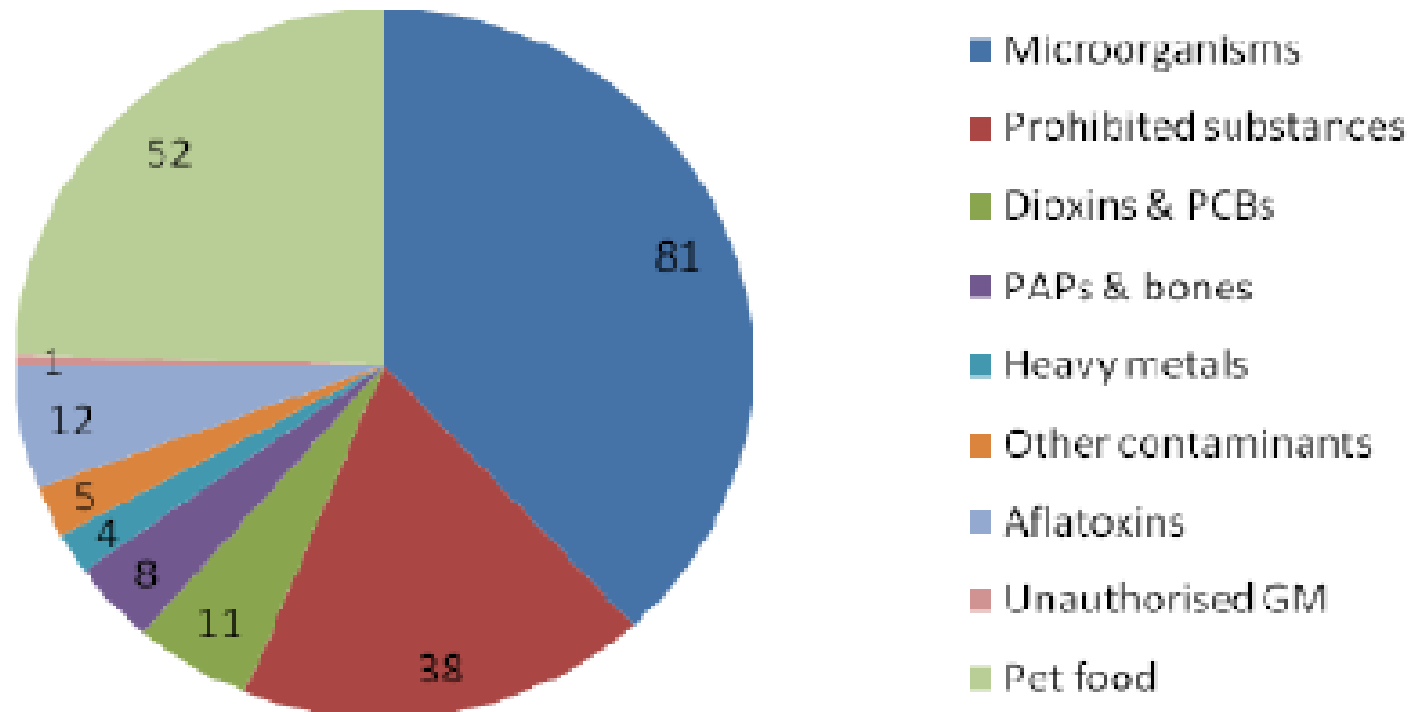
# RASFF in 2008

## Contaminations by product type



# RASFF in 2008

## Types of Contaminations



# FVO missions on the implementation of feed hygiene legislation

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- Objectives and scope:
  - Registration and approval
  - Requirements for primary producers and other feed operators
  - Quality control and HACCP
- Feed safety audits carried out:
  - 2006 --> 4 MS
  - 2007 --> 7 MS
  - 2008 --> 6 MS
  - 2009 --> 12 MS planned

# Key findings of FVO missions on the implementation of feed hygiene legislation

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- **Approval finalised in most cases**
- **Registration on-going (rarely completed) but difficulties:**
  - primary production
  - food operators
  - transporters
  - new activities
- **Transitional period used in most cases**
- **Primary producers: good level of compliance in principle but uneven official controls**
- **Feed operators: premises and equipment (OK) / Records and recall procedures (OK)**
- **Weaknesses in the design and implementation of HACCP**
  - Lack of adaptation (generic HACCP)
  - Definition of CCPs
  - Validation of controls
- **Control of cross-contamination deficient in some cases**

# EU feed safety workshop

## FEFAC recommendations

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- Commission report on implementation of feed hygiene (DG SANCO)
- Examination of specific approval conditions for drying plants (ex of German legislation) (DG SANCO/SCoFCAH)
- HACCP guidance on fuel sources (DG SANCO)
- Guidance to good practice for primary production and on-farm mixing
- HACCP guidance for surplus foods from second transformation

# EU feed safety workshop

## Commission conclusions

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- Increased vigilance when there is a change in the production process and a change of supplier;
- Pro-active approach : due to melamine carry-over, particular attention should be paid to the presence of melamine in fish and fish products;
- Regular monitoring on the presence of undesirable substances through a reliable screening methodology is needed;
- Thorough knowledge of the food production process to assess the possible risks related to by-product;
- Direct heating: a clear focus should be given to the risk inherent to the heating process (specific approval process)



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# Future feed safety challenges

# Key conclusions of the FAO/WHO report on Animal Feed Impact on Food Safety

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- Minimum safety criteria for the safe use of feed ingredients are needed;
- Criteria and methods for decontamination, disinfection and cleaning of feed should be developed;
- Rapid and economical analytical methods should also be developed;
- Rapid notification of the competent authorities about feed safety incidents is of key importance
- Training of regulators, inspectors, feed and livestock industry personnel and farmers are required

# CODEX electronic working group on animal feed safety

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- Key recommendations of the CODEX EWG I:
  - Risk assessment guidelines
  - Global list of feed hazards
  - Extension of INFSAN to feed
- Electronic working group consultation in November 2008
- Discussion paper for public consultation in January 2009
- 2<sup>nd</sup> IFIF feed regulators meeting in Atlanta on 26 January 2009 focusing on hazards linked to by-products of biofuels industry

# International Network of Feed Safety Incidents (INFSI)

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## Objectives:

- To improve coordination of follow-up on emerging feed safety risks.
- To build up a more efficient and rapid information exchange between feed chain partners.
- To enable a better and more timely feed industry response to competent authorities.

## Composition:

- FEFAC Members
- Scheme owners (FEMAS, OVOCOM, PDV and QS)
- FAMI-QS and GMP+
- IFIF

# International Network of Feed Safety Incidents (INFSI)

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## Practical modalities: current basis:

- Agreement on “trigger” mechanism: official information notified in national, European (and future international (INFOSAN)) rapid alert systems.
- Mutual links to existing internal rapid alert system operated by scheme owners
- Inspiration of the International Food Safety Authorities Network (INFOSAN) developed by WHO in cooperation with FAO

## Issues to be discussed:

- Need for a formal agreement between Task Force participants with a clear mandate
- Inclusion of the pet food sector ?
- Scope: to be extended ?



**FEFAC**

**Thank you for your attention!**

[www.fefac.org](http://www.fefac.org)

