

comisión del codex alimentarius



ORGANIZACIÓN DE LAS NACIONES
UNIDAS PARA LA AGRICULTURA
Y LA ALIMENTACIÓN

ORGANIZACIÓN
MUNDIAL
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Tema 5 del programa

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**PROGRAMA CONJUNTO FAO/OMS SOBRE NORMAS ALIMENTARIAS
GRUPO DE ACCIÓN INTERGUBERNAMENTAL ESPECIAL DEL CODEX
SOBRE BUENA ALIMENTACIÓN ANIMAL
Segunda reunión
*Copenhague, Dinamarca, 19-21 de marzo de 2001***

**EXAMEN, EN EL TRÁMITE 4, DEL ANTEPROYECTO REVISADO DE CÓDIGO
DE PRÁCTICAS SOBRE BUENA ALIMENTACIÓN ANIMAL**

1. En el presente documento se resumen observaciones adicionales de los gobiernos y organismos interesados en respuesta a la circular CL 2000/30-AF sobre el Anteproyecto Revisado de Código de Prácticas sobre Buena Alimentación Animal.
2. En el documento las observaciones se presentan en orden alfabético de países.

Observaciones de:

NORUEGA, COMUNIDAD EUROPEA, COCERAL (Comité de Comercio de Cereales, Semillas Oleaginosas, Piensos, Aceites y Grasos y Suministros Agropecuarios de la Unión Europea).

OBSERVACIONES RELATIVAS AL ANTEPROYECTO REVISADO DE CÓDIGO DE PRÁCTICAS SOBRE BUENA ALIMENTACIÓN ANIMAL

NORUEGA**PREPARATION FOR TASK FORCE ON GOOD ANIMAL FEEDING**

Norway appreciates the opportunity to comment on the revised draft code of practice on good animal feeding (CL 2000/30-AF).

PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING

Norway welcomes the proposed draft code of practice on good animal feeding. We fully support the need to establish a feed safety system from farm to table in order to eliminate the potential risks to human health, animal health, and the environment.

The Norwegian legislation is almost fully harmonized with the EU legislation on feedingstuffs. The comments made by the EU therefore give information about the Norwegian situation.

COMMENTS ON SECTION 2 “PURPOSE AND SCOPE”

The code is proposed to also include aquaculture. This is strongly supported.

COMMENTS TO SECTION 3 “DEFINITIONS”.

Terms such as “ingredients” and “raw materials” should not be used since they are not clearly defined and may cause confusion.

The definition of feedingstuffs should be replaced by:

“Feedingstuffs: Various products of vegetable or animal origin, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing additives, which are intended for use in oral animal feeding, either directly as such or after processing, in the preparation of compound feedingstuffs or as carriers of premixtures.”

The definition of feed additives should be replaced by:

“Feed Additives: Substances or preparations used in animal nutrition in order to affect favourably the characteristics of feed materials, feedingstuffs or animal products or to satisfy nutritional needs or improve animal production or to meet specific nutritional needs of animals at a particular time or to reduce the harmful effect of animals excretion or to improve the animal environment.”

A definition of premixtures should be included after the definition of additives.

The definition of medicated feedingstuffs should be replaced by the following:

“Medicated feedingstuffs: Any mixture of a veterinary medicinal product or products and feed, which is readily prepared for marketing and intended to be fed to animals without further processing, because of its curative or preventive properties or other properties as a medicinal product.”

The definition of undesirable substances should be extended also to products. The following definition is proposed to replace it.

Undesirable substances or products: undesirable substance or product means any substance or product, with the exemption of pathogenic micro-organisms, which is present in or on the product intended for animal feeding and which constitutes a potential danger to animal or human health or the environment or could negatively affect livestock and/or aquaculture production.”

After the definition of “undesirable substances or products” a definition on “circulation” should be included.

“Circulation: The holding of feed materials, additives, premixtures or compound feedingstuffs for the purposes of sale, including offering for sale, or any other form of transfer, whether free or not, to third parties, and the sale and other forms of transfer themselves.”

COMMENTS TO SECTION 4 “GENERAL PRINCIPLES AND REQUIREMENTS”

4.1. Raw materials, minerals, vitamins and feed additives

The title of point 4.1 should be replaced by the following:

“Feed materials and feed additives”

In the text it is necessary to stress that feed materials and additives should be authorised for use in feedingstuffs only if they represent no danger to animal or human health or to the environment.

In the text the term herbicide should be deleted as it is covered by pesticides.

4.2. Labelling

The objectives of the feed labelling should be more clearly defined. A list explaining the information required on the label or the accompanying document is necessary.

Feedingstuffs consisting of or containing GMO should be labelled as such.

Special methods of production such as organic production should be indicated on the label.

4.3. Traceability and record keeping

A traceability system should be implemented at all stages of circulation of feed materials, additives and compound feedingstuffs. Proper labelling and a system of record keeping are necessary parts of such a system. A harmonised system at international level for record keeping and traceability should be established.

The wording “master formulae”, should be clarified/defined (under section 2).

4.4 Inspection and control procedures

The aim of the official control programmes should be more clearly defined.

A more detailed guide on how to perform inspections would be useful.

The manufacturers should implement good manufacturing practices (GMP) and a hazard analysis and critical control point system (HACCP).

The necessity to exchange information in feed control emergency situations where there is a clearly identified risk for human or animal health or the environment should be underlined.

Bodies responsible for the assessment of laboratories should be designated. Such bodies shall comply with the criteria for laboratory accreditation bodies. The validation of methods of analysis used in the context of official controls of feedingstuffs should be ensured.

4.5. Health hazards associated with animal feed.

The presence of undesirable substances or products (e.g. pesticides, mycotoxins, radionuclides, industrial chemicals) in feed materials, feed additives, and compound feedingstuffs should be minimised.

The establishment of maximum limits for undesirable substances or products at international level is supported.

Feed materials

Feed materials should be put into circulation only if they are sound, genuine and of merchantable quality. When put into circulation or used they should not represent any danger to animal or human health or to the environment and not be presented or circulated in a manner liable to mislead.

All fallen stock and condemned material should be excluded from the feed chain.

A negative list of prohibited feed materials, should be developed in the short term. Annex I includes a proposal for a list of prohibited feed materials.

5. INDUSTRIAL PRODUCTION OF ANIMAL FEEDINGSTUFFS.

Comments to the implementation of GMP protocol:

In paragraph 6 “*ingredients*” should be replaced by “*feed materials, additives*”.

Paragraph 10 should underline the use of manufacturing strategies to minimise cross contamination (flushing, sequencing, and physical cleanout). Special attention should be paid to certain feed materials or additives. In cases where the risk linked to cross-contamination is high, separate production lines should be introduced.

In paragraph 18 the term “*ingredients*” should be replaced by “*feed materials, additives*”.

In paragraph 19 the term “*contaminants*” should be replaced by “*undesirable substances or products*”.

Paragraph 20 should include requirements for cleaning and disinfecting programmes.

A new paragraph on sampling procedures is desirable. Provisions for transport should be added.

SECTION 6. “ON-FARM PRODUCTION AND USE OF FEEDINGSTUFFS”

This part should not include HACCP provisions. At the level of the farm Good Production Practices (GPP) should apply.

SECTION 7. “METHODS OF ANALYSIS AND SAMPLING”

Laboratories entrusted with the official control of feedingstuffs should comply with the general criteria for the operation of testing laboratories laid down in International Standards e.g. ISO/IEC 17025 on General requirements for the competence of testing and calibration laboratories.

As regards sampling, it would be useful to develop an international method for sampling taking into account the particularities of the feed sector. In this connection FAO/Codex has elaborated certain sampling methods for contaminants in food. In general, the same analytical methods (possibly with some adjustment) should be used for the analysis of feedingstuffs as for the analysis of foods. Quite often the sample matrix for feedingstuffs and food is comparable. For microbiological analysis NMKL and ISO has lately frequently included feedingstuffs when revising methods that previously just included food.

Examples of analytical methods:***Salmonella* spp:**

NMKL No 71, 5. ed., 1999. *Salmonella*. Detection in foods.

Or:

ISO/DIS 6579 (last ed. 2000: draft). Microbiology of food and animal feeding stuffs – Horizontal method for detection of *Salmonella* spp.

Mould and yeast:

NMKL No 98, 3 ed., 1995. Mould and yeasts. Determination in food.

Heavy metals

NMKL No 161, 1998. Metals. Determination by atomic absorption spectrophotometry after wet digestion in microwave oven.

According to this method Pb, Cd, Cu, Zn and Fe can be determined, and with some adjustment it is also possible to detect Hg, Mn, Co, Mo and Cr.

Mycotoxins

Actual parameters for mycotoxins would be aflatoxins, ochratoxin A, zeralenone, and trichothecener type A + B. Several methods for determination of mycotoxins in food can also be used for feed additives and feedingstuffs, although some adjustment might be necessary.

AFATOXINS B1, B2, G1 AND G2 IN FEEDINGSTUFFS

Method for the determination of aflatoxin BG in figs, pistachios, peanut butter and paprika powder. Validated method in the SMT project CT96-2045 for validation of analytical methods for Mycotoxins (1997-1998).

TRICHOTHECENER TYPE A+B

No international validated method. An ongoing project in EU:
“EU-SMT 4-CT96-2047. Intercomparison of trichothecene analysis and feasibility to produce certified standards and reference material”.

Zeralenone

As far as we know there is no international validated method based on modern analytical principles. One method is dominant, and there is a project going on in EU: EU-SMT4-CT98-2228.

Reference:

ZeralaTest Instruction Manual from Vicam L.P., Watertown, MA, USA
Schuhmacher et al: Fresenius J. Anal. Chem. (1997) 359: 510-515.

Ochratoxin A

There is one method validated for barley. The method is validated in a EU-project CT96-2045 in 1998. This method should also be applicable for feedingstuffs.

Reference:

Method for the determination of ochratoxin in barley. Validated method in the SMT project CT96-2045 for validation of analytical methods for Mycotoxins (1997-1998).

Annex I

1. Faeces, urine, as well as separated digestive tract content resulting from the emptying or removal of the digestive tract, irrespective of any form of treatment or admixture.
2. Hide treated with tanning substances, including its waste.
3. Seeds and other plant propagating materials which, after harvest, have undergone specific treatment with plant protection products for their intended use (propagation), and any derived by-products.
4. Wood, sawdust and other materials derived from wood treated with wood protection products.
5. All wastes obtained from the various phases of the urban, domestic and industrial waste water (*) treatment process, irrespective of any further processing of these wastes and irrespective also of the origin of the waste waters.

The term “waste water” does not refer to “process water”, i.e. water from independent conduits integrated in food or feed industries; where these conduits are supplied with water, this must be wholesome and clean water (**). In the case of fish industries, the conduits concerned might be also supplied with clean seawater (***). Process water shall only carry feedingstuffs or foodstuffs material and shall be technically free from cleaning agents, disinfectants or other substances not authorised by the animal nutrition legislation.

Materials of animal origin in the process water shall be treated in accordance with Council Directive 90/667/EEC.

(*) As defined in Article 2 of Council Directive 91/271/EEC of 21 May 1991 concerning urban waste water treatment;

(**) As specified in Article 4 of Council Directive 98/83/EC of 3 November 1998 concerning the quality of water intended for human consumption.

(***) As defined in Article 2 of Council Directive 91/493/EEC of 22 July 1991 laying down the health conditions for the production and the placing on the market of fishery products.

6. Solid urban waste, such as household waste.
7. Untreated waste from eating places, excluding foodstuffs of vegetable origin considered unsuitable for human consumption for reasons of freshness.
8. The packaging and parts of packaging from the use of products from the agri-food industry.

The list may be extended relative to new information.

COMUNIDAD EUROPEA

{Nota de la Secretaría: Véase Sección 4.5.2 *Materiales para piensos* (CX/AF 1/5). Apéndice I mencionado como referencia.}

Anexo I

1. Materias fecales, orina y el contenido aislado del aparato digestivo, obtenido al vaciar o separar el aparato digestivo, con independencia de cualquier tipo de tratamiento o mezcla realizados.
2. Cueros tratados con sustancias de curtido, incluidos sus residuos.
3. Semillas y otros materiales para la propagación de vegetales que, tras la cosecha, hayan recibido un tratamiento específico con productos fitosanitarios por el uso al que se destinan (propagación), y todos sus subproductos.
4. Madera, serrín y subproductos de la madera que hayan sido tratados con productos fitosanitarios.
5. Todos los residuos obtenidos en las distintas fases del proceso de tratamiento de aguas residuales urbanas, domésticas e industriales ^(*), independientemente de cualquier proceso posterior al que se sometan dichos residuos e independientemente también del origen de las aguas residuales.

El término "aguas residuales" no hace referencia a las "aguas de proceso", es decir, el agua procedente de conductos independientes integrados en industrias alimentarias o de fabricación de piensos; cuando estos conductos se abastezcan de agua, ésta deberá ser salubre y limpia ^(**). En el caso de las industrias pesqueras, los conductos podrán también abastecerse de agua de mar limpia ^(***). Las aguas de proceso sólo pueden contener materias procedentes de piensos o productos alimenticios y deben estar técnicamente libres de agentes limpiadores, desinfectantes u otras sustancias no autorizadas por la legislación sobre alimentación animal.

Las materias de origen animal presentes en las aguas de proceso se tratarán de acuerdo con lo dispuesto en la Directiva 90/667/CEE del Consejo.

6. Residuos sólidos urbanos, tales como las basuras domésticas.
7. Residuos no tratados procedentes de establecimientos de restauración, salvo los productos alimenticios de origen vegetal que se consideren inapropiados para el consumo humano por no estar frescos.
8. Envases y partes de los envases procedentes de la utilización de productos de la industria agroalimentaria
9. Proteínas animales elaboradas: la harina de carne y huesos, la harina de carne, la harina de huesos, la harina de sangre, el plasma seco u otros productos derivados de la sangre, las

^(*) Según lo definido en el artículo 2 de la Directiva 91/271/CEE del Consejo, de 21 de mayo de 1991, sobre el tratamiento de las aguas residuales urbanas;

^(**) Según se especifica en el artículo 4 de la Directiva 98/83/CE, de 3 de noviembre de 1998, relativa a la calidad de las aguas destinadas al consumo humano.

^(***) Según lo definido en el artículo 2 de la Directiva 91/493/CEE, de 22 de julio de 1991, por la que se fijan las normas sanitarias aplicables a la producción y a la puesta en el mercado de los productos pesqueros.

proteínas hidrolizadas, la harina de pezuñas, la harina de astas, la harina de desechos de aves de corral, la harina de plumas, los chicharrones desecados y otros productos similares, incluidas las mezclas, los piensos, los aditivos destinados a la alimentación animal y las premezclas, que contengan estos productos.

10. La harina de pescado para rumiantes.
11. La gelatina de origen animal, excepto la gelatina derivada de animales no rumiantes para el recubrimiento de aditivos.
12. Las grasas derivadas de rumiantes, salvo si están purificadas de modo que los niveles máximos de los residuos totales de impurezas no solubles no sobrepasen el 0,15% del peso.

COCERAL

- **Point 4.1 Raw materials, minerals, vitamins and feed additives**

“Raw materials of animal, plant and/or marine origin should be obtained from **reputable** sources, preferably with a supplier **warranty**.”

After consultation of COCERAL members we would like to propose the following wording of the sentence:

“Raw materials of animal, plant and/or marine origin should be obtained from **safe** sources, preferably working on the basis of a **code of good practice**.”

We would like in this context to draw your attention to the European Code of Good Trading Practice elaborated by COCERAL members, which we also enclose to this letter.