

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

**Agenda Item 3**

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**AD-HOC INTERGOVERNMENTAL CODEX TASK FORCE ON ANIMAL FEEDING**  
**Fourth Session**  
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**PROPOSED DRAFT CODE OF PRACTICE ON GOOD ANIMAL FEEDING**

**REPORT OF THE DRAFTING GROUP ON REVISION OF SECTION 6-7 AND REORGANIZATION OF SECTION 5**

Comments have been received from Australia, Colombia, Egypt, Switzerland, United States, European Community<sup>1</sup>, FEFAC (European Feed Manufacturers Federation) and IFIF (International Feed Industry Federation)

**GENERAL COMMENTS**

**Australia**

Australia encourages the development of a Code that adopts wide principles. This not only allows ease of compliance, but also allows individual states to further adopt more prescriptive regulation if they so desire.

It is important, in developing the code, to keep in mind that the measures to be put in place are primarily focused on food safety.

Australia supports the inclusion of HACCP, GMP and GAP in the code as appropriate. This is in recognition that in different situations, any one or all three may be the more appropriate mechanism to apply.

**Colombia**

Con respecto al presente documento que se expondrá en la 4ª Reunión del Grupo Intergubernamental Especial de Alimentación Animal, la delegación de Colombia se permite hacer algunos comentarios, los cuales se encuentran resaltados en color rojo a reglón seguido del párrafo original.

**Switzerland**

We think the work of the Drafting Group makes the text of Sections 5 and 6 better understandable. Therefore we only have some minor comments.

**United States**

The Drafting Group is to be commended for the greatly improved document in our view the document is in need

<sup>1</sup> European Community's comments are also available in French and Spanish (CRD 6)

of only minor revisions. The United States has reviewed the Proposed Draft and would like to make the following suggestions for amending the draft.

### **European Community**

The European Community welcomes the work carried out by the Drafting Group led by Canada with the assistance of other countries and international organisations.

The European Community is satisfied in general with the proposed draft, although it would like to propose a few changes to improve and give consistency to the current text.

#### **1. General comment regarding points: 34,35,38,39,42, 49 and 58**

Include the term “feed ingredients” in the following paragraphs as indicated:

34. “ .....*intended for use in feed and feed ingredients should be stored.....”.*

35 “ *Processed feeds or feed ingredients should be stored .....*”

38 “ *Care should be taken to minimise deterioration and spoilage at all stages of handling, storage and transport of feeds and feed ingredients. Special .....*”

39 “ *Waste feed and feed ingredients and other .....*”

42 “ *Feed and feed ingredients processing plants, storage facilities...”*

49 “ .....*between batches of feed and feed ingredients containing restricted.....”*

58 ”.....*contamination of feed and feed ingredients and food.....”*

COMMENT: according to the definitions laid down in Section 3 the term “feed” does not cover “feed additives”.

### **FEFAC**

We would like to thank you again for investing so much time and efforts to achieve the right balance regarding the planned adoption at step 5 of the draft Codex Code of Practice on Good Animal Feeding,. We thank you also for giving the floor to observer members, as we believe this code is a key step towards harmonisation of rules in terms of feed-safety related human health issues at international level.

You will find attached our comments on section 5, 6 and 7 of the draft code.

### **SPECIFIC COMMENTS**

#### **SECTION 5: PRODUCTION, PROCESSING, STORAGE, TRANSPORT AND DISTRIBUTION OF FEEDS AND FEED INGREDIENTS (PARAS. 27-30)**

##### **Egypt**

(Paragraph 27) - We suggest that the abbreviation is not identified, so it is not desired.

(Paragraph 28) - Feeds and Feed ingredients should not be produced, processed, stored, transported or distributed in facilities or using equipment where operations may affect their safety and lead to indirect adverse effects on the health of consumers.

The application of GMP and GAP principles should be followed in both aquaculture and terrestrial-based production.

##### **United States<sup>2</sup>**

27. The production, processing, storage, transport and distribution of safe and suitable feed and feed ingredients

<sup>2</sup> New additions are underlined; old parts are struck through

is the responsibility of all participants in the feed chain, including farmers, feed compounders, transporters, ~~truckers~~, etc. Each participant in the feed chain is responsible for all activities which are under their direct control including compliance with any applicable statutory requirements.

*Rationale:* Transporters is more accurate than truckers because it includes all types of transportation.

28. Feeds and feed ingredients should not be produced, processed, stored, transported or distributed in facilities or using equipment where incompatible operations may lead to adverse effects on ~~the health of consumers~~ consumer health. Due to the unique characteristics of aquaculture, the application of these general principles must consider the differences between aquaculture and terrestrial-based production.

*Rationale:* The term consumer health is used in the Purpose and Scope section of the document and is a more accurate description.

29. Where appropriate, operators should follow GMPs and/or HACCP principles to control hazards that may ~~occur in food. The aim is to prevent contamination of~~ contaminate animal feed and food of animal origin as far as this is reasonably achievable, recognising that total elimination of hazards is often not possible.

*Rationale:* Clearer and more concise.

*Comment:* Paragraph 29 is the first mention of HACCP. HACCP is not mentioned in the Codex Procedural Manual (12<sup>th</sup> Edition) but is addressed in the General Principles of Food Hygiene. A reference to the General Principles of Food Hygiene should be included in the text or as a footnote.

30. The effective implementation of GMPs and/or HACCP ~~based approaches~~ principles should ensure, in particular, that the following areas are addressed.

*Rationale:* Consistent with the other uses regarding HACCP language throughout the document (see paragraph 29).

## **European Community**

### **Point 29**

Replace the point by the following:

*“Where appropriate operators should follow GMPs and/or HACCP principles to control hazards that may affect food safety. The aim is to ensure feed safety and in particular to prevent contamination of animal feed and food of animal origin as far as this is reasonable achievable, recognising that total elimination of hazards is often not possible.”*

COMMENT: GMP and/or HACCP are not only to prevent (cross-)contamination. They also cover safety in the broader sense.

## **IFIF**

Fourth paragraph - In the listing following: “The effective implementation of GAPs, GMPs and/or HACCP principles should ensure ...”

## **SECTION 5.1 - PREMISES (PARAS. 31-33)**

### **United States**<sup>3</sup>

33. Sewage, waste and rain water are disposed of in a manner that ~~avoids~~ minimizes contamination of facilities, equipment, feed and feed ingredients.

*Rationale:* The word minimizes more accurately describes what is achievable.

<sup>3</sup> New additions are underlined; old parts are struck through

**IFIF**

ii “Work and equipment areas ...”

Replace the words “... are free of ...” to “... do not contain ...” and leave the remainder of the sentence in tact.

iv “Water used ...”

Replace the words “... and is of potable quality for animals ” with “ and is suitable to the animals being fed.”

**Section 5.2 - Receiving, Storage and Transportation (paras. 34-40)****Australia**

37. Feeds and feed ingredients should be delivered and used as soon as possible. All feeds and feed ingredients should be stored and transported in a manner which minimises deterioration and contamination and enables the correct feed to be sent to the right animal group.

In order to maintain separation of products it is essential they be appropriately identified, therefore insert **identified**, before **stored**.

40. By-products from wild fish and aquaculture should only be used in aquaculture feed when regarded as safe by national experts based on facts given by competent authorities on the animal health status in the country.

This wording implies an active approval system for the use of fish by-products in aquaculture. To account for the absence of such a system in some countries, reword with:

By-products from wild fish and aquaculture **may** be used in aquaculture feed **unless** regarded as **unsafe** by national experts based on facts given by competent authorities on the animal health status in the country.

**Colombia**<sup>4</sup>**5.2 Recepción, almacenamiento y transporte**

35. Los piensos elaborados deberán ser almacenados separadamente de los ingredientes de piensos no elaborados, y se deberán utilizar materiales de envases apropiados.

Los piensos elaborados deberán ser almacenados separadamente de los ingredientes de piensos no elaborados, y se deberán utilizar para este propósito materiales de empaque apropiados.

37. Se deberá minimizar la condensación de la instalaciones de producción y elaboración de piensos e ingredientes para piensos.

Se deberá minimizar la condensación en la instalaciones de producción y elaboración de piensos e ingredientes para piensos.

**United States**<sup>5</sup>**5.2 Receiving, Storage and Transportation**

~~40. By products from wild fish and aquaculture should only be used in aquaculture feed when regarded as safe by national experts based on facts given by competent authorities on the animal health status of the country.~~

*Rationale:* Paragraph 40 should be moved to the Aquaculture Section 6.5 since it more appropriate aquaculture-specific issues.

<sup>4</sup> Comentarios se encuentran “underlined”seguido del párrafo original.

<sup>5</sup> New additions are underlined; old parts are struck through

**European Community****Point 35**

Add the following sentence to point 35:

*“Feed and feed ingredients containing feed ingredients that could be harmful to specific animal species or cause harm to food safety should be handled, stored and transported separately in order to avoid contamination”.*

**Point 38**

The words *“for aquaculture”* should be deleted.

COMMENT: The requirements set out in the second sentence in point 38 apply to all moist and semi-moist feed.

**Point 40**

COMMENT: This requirement should be further clarified. The epidemic control requirements apply to all types of feed.

**IFIE**

vi “Condensation is minimised”

Expand this sentence to include “.. in process and manufacturing facilities.”

**SECTION 5.3 - PERSONNEL TRAINING (PARA. 41)****European Community**

Replace the point by the following:

*“All personnel involved in the manufacture, storage and handling of feed and feed ingredients should be adequately trained and aware of their role and responsibility in protecting feed safety”*

**SECTION 5.4 - SANITATION AND PEST CONTROL (PARAS. 42-45)****Egypt**

Paragraphs 44-45 - Machinery should be kept clean and dry after operations and processing all time.

**SECTION 5.5 - EQUIPMENT PERFORMANCE AND MAINTENANCE (PARAS. 46-48)****Egypt**

Paragraphs 47-48 - the 2 paragraphs can be merged together as follows:

All mixture and other equipment used in manufacture of feed and feed ingredients should be tested regularly to verify their performance.

**United States<sup>6</sup>****5.5 Equipment Performance and Maintenance**

48. All other equipment used in the manufacture of feeds and feed ingredients are appropriate for the range of weights or volumes being processed, ~~and tested regularly to verify their performance.~~

*Rationale:* Not clear what the deleted phrase means. Mixers or measuring devices can be tested to verify performance but most other equipment cannot.

**SECTION 5.6 - MANUFACTURING CONTROLS (PARAS. 49-50)**

<sup>6</sup> New additions are underlined; old parts are struck through

**Australia**

49. Manufacturing procedures should be used to avoid cross-contamination (for example flushing, sequencing and physical clean-out) between batches of feed containing restricted or otherwise potentially harmful materials (such as certain animal by-products, veterinary drugs). These procedures should also be used to minimise cross-contamination between medicated and non-medicated feeds and other incompatible feeds. In cases where the food safety risk associated with cross-contamination is high and the use of proper flushing and cleaning methods is deemed insufficient, consideration should be given to the use of completely separate production lines, transfer, storage and delivery equipment.

Sentence 1 – Since the second sentence specifically refers to medicated feeds, the reference to vet drugs (, **veterinary drugs**) should be deleted.

**United States**<sup>7</sup>

50. Pathogen control procedures, such as heat treatment or the addition of authorised chemicals, ~~should be~~ are used where appropriate, and monitored at the applicable steps in the manufacturing process.

*Rationale:* The phrase “should be” suggests a requirement to use heat or an authorised chemical; “are” suggests that the manufacturer has a choice, based on his needs.

**European Community****Point 49.**

The second sentence is replaced by the following:

*“These procedures should also aim to prevent cross-contamination between medicated and non-medicated feed or feed ingredients, and other incompatible feed or feed ingredients.”*

COMMENT: the proposed wording is in line with paragraph 29 which *expresses “the aim to prevent”* instead of “*minimise*” contamination.

**FEFAC**

Par 49

After this section and before Recalls, a new section should be added to cover quality control checks, sampling and sample retention. This would become even more essential if the reference to sample retention in par. 12 should not be kept.

**SECTION 6 - ON-FARM PRODUCTION AND USE OF FEED AND FEED INGREDIENTS (PARAS. 52-54)****Switzerland**

54. Good Agricultural Practice (GAP) needs a definition. We do not know any GAP principles that could be applied in this context.

~~Two~~ *Three types of contamination ...*

- *Biological, ...*
- *Chemical, ...*
- *Physical, such as broken needles, other foreign material and radioactive irradiation*

Comment: The third type of contamination should not be removed from the list. Radioactive irradiated feeds were a big problem for several years after the nuclear accident of Chernobyl.

<sup>7</sup> New additions are underlined; old parts are struck through

**United States**<sup>8</sup>**Section 6 - On-Farm Agricultural Production and Use of Feed and Feed Ingredients**

*Rationale:* Section 6.1 refers to Agricultural Production of Feed. Adding the word agriculture to the title of the Section better describes the Section and also makes it consistent with sub-headings used later in the Section.

**European Community****Point 54**

A new indent should be added to include “- *Physical contamination*”

COMMENTS: this was included in an earlier draft but has now been deleted. It is applicable and would include debris in fields, tractor batteries etc...

**FEFAC**

Par. 54

Physical contaminants should be reinserted. For instance, broken needles, bits of metal or glass, etc. can cause gut damage leading to ulceration and septicaemia which could make meat products dangerous to human health

**Section 6.1 - Agricultural production of Feed (paras. 55- 62)****Australia****Section 6.1.4**

62. Chemicals should be disposed of responsibly in a manner that will not lead to contamination of any body of water, soil, feed or feed ingredient that may lead to the contamination of foods of animal origin which could adversely affect food safety.

The use of **responsibly** together with **in a manner...** is tautology. **Responsibly** should be deleted.

**Colombia**<sup>9</sup>**6.1 *Producción de piensos en la agricultura***

55. La mayor parte del ganado consumirá parte de su lecho. Los cultivos que producen tal material o materiales para el lecho como p. Ej. Paja o virutas de madera, deberán ser manejados como ingredientes para piensos. Deberán aplicarse prácticas de ordenación de pastos, tales como pastoreo rotatorio y dispersión de excrementos para reducir de esta manera la contaminación cruzada entre grupos de animales.

Es posible que los que el ganado consuma parte de su lecho, por lo tanto los cultivos que producen tal material o materiales para el lecho como p. Ej. paja o virutas de madera, deberán ser manejados como ingredientes para piensos. Deberán aplicarse prácticas de manejo de praderas, tales como rotación de potreros y dispersión de excrementos para reducir de esta manera la contaminación cruzada entre grupos de animales.

**6.1.1 *Selección del sitio***

56. El suelo utilizado para la producción de piensos no deberá estar ubicada demasiado cerca de actividades industriales donde se podría esperar que contaminantes del aire atmosférico o del suelo o escorrentías de tierra contigua resultaran en la producción de alimentos de origen animal con riesgos para la inocuidad alimentaria. Las escorrentías de suelo contiguo y el agua de irrigación no deberán contener contaminante alguno.

El terreno utilizado para la producción de piensos, no deberá estar ubicado demasiado cerca de donde se desarrollan actividades industriales, dado que se podría esperar que contaminantes atmosféricos, del suelo, de aguas subterráneas o escorrentías en terrenos contiguos, resultaran en la producción de alimentos de origen

<sup>8</sup> New additions are underlined; old parts are struck through

<sup>9</sup> Comentarios se encuentran “underlined”seguido del párrafo original.

animal con riesgos para la inocuidad alimentaria. Las escorrentías de los terrenos contiguos o adyacentes y el agua de irrigación no deberán contener contaminante alguno.

#### **6.1.4. Pesticidas**

60. En la medida de lo posible se deberán aplicar pesticidas procedentes de suministradores acreditados.

En la medida de lo posible, se deberán aplicar pesticidas suministrados por proveedores acreditados.

Es importante que los agricultores observen escrupulosamente las instrucciones de empleo de los productores.

Es importante que los agricultores observen escrupulosamente las instrucciones de empleo proporcionadas por los fabricantes y consignadas en la etiqueta de los productos.

### **Switzerland**

#### **6.1.3 Chemical fertilizers**

*... so that they do not negatively impact on the safety of foods of animal origin. e.g., ~~cadmium content should be monitored.~~*

Comment: Monitoring of heavy metal content in fertilizers may be difficult on a single farm level.

### **United States**<sup>10</sup>

#### **6.1.1 Site Selection**

~~56. Land used for production of animal feeds~~ Animal feeds ~~should not be located produced in close proximity to industrial operations where industrial~~ where pollutants from air or ground water would be expected to result in the production of foods of animal origin that may present a food safety risk. Runoff from adjacent land and irrigation water should be free of any contaminants that may present a risk to consumer food safety.

*Rationale:* The revised wording is more concise and better states the concerns when selecting a site for production of animal feed crops.

#### **6.1.2 Manure Fertilizer**

57. Where manure fertilisation of crops on pastures is practised, an appropriate handling and storage system should be in place and maintained to minimise environmental contamination, which could negatively impact on the safety of foods of animal origin. ~~There should be adequate time between applying the manure and grazing, to allow the manure to decompose and to minimize contamination.~~

*Rationale:* The information in the deleted sentence is covered in paragraph 72 that deals with pasture grazing and is more appropriate in that paragraph.

#### **6.1.3 Chemical Fertilizers**

59. Chemical fertilizers should be handled, stored and applied so that they do not negatively impact on the safety of foods of animal origin, ~~e.g., cadmium content should be monitored.~~

*Rationale:* Examples are not given in other Sections of the Code and giving an example here serves no apparent purpose. There are many components besides cadmium that may be of concern.

#### **6.1.4 Pesticides and Agricultural Chemicals**

*Rationale:* Section 6.1.4 discusses both pesticides and agricultural chemicals, thus the title should indicate this.

61. Agricultural chemicals should be stored and used in accordance with Good Agricultural Practice for Use of Pesticides (GAP) as outlined on page 42 of the 12<sup>th</sup> edition of the Codex Alimentarius Commission's Procedural Manual.

<sup>10</sup> New additions are underlined; old parts are struck through



Comment: The use of the term GAP appears first in Section 4. We suggest adding the reference to GAP (Good Agricultural Practice for Use of Pesticides (GAP) as outlined on page 42 of the 12<sup>th</sup> edition of the Codex Alimentarius Commission's Procedural Manual) in Section 4, either directly in the text or as a footnote.

## **European Community**

### **Point 57**

Replace the last sentence by the following:

*“There should be an adequate time between applying the manure and grazing or forage harvesting (ensilaging and haymaking) to allow the manure to decompose and to minimise contamination.”*

## **SECTION 6.2 - MANUFACTURING OF FEED ON-FARM (PARAS. 63-68)**

### **Australia**

#### **Section 6.2.2**

66. In particular, feed should be mixed in a manner that will minimise the potential for cross-contamination between feeds or feed ingredients that may have an effect on the safety, or withholding period for the feed or feed ingredients. Manufacturing procedures should be used to avoid cross-contamination (for example flushing, sequencing and physical clean-out) between batches of feed containing restricted or otherwise potentially harmful materials (such as certain animal by-product meals, veterinary drugs). These procedures should also be used to minimise cross-contamination between medicated and non-medication feeds and other incompatible feeds.

Since the third sentence specifically refers to medicated feeds, the reference to vet drugs (**, veterinary drugs**) should be deleted.

### **Switzerland**

#### **6.2 On-Farm Manufacturing of Feed** (instead of *Manufacturing of Feed On-Farm*)

### **United States**<sup>11</sup>

#### **6.2.2 Mixing**

65. On-farm feed manufacturers should follow the applicable guidelines established in Section 5 of this code. Particular attention should be given to Subsection 5.6-~~4~~ of this code.

*Rationale:* The correct reference is 5.6.

66. ~~In particular~~, Feed should be mixed in a manner that will minimise the potential for cross-contamination between feeds or feed ingredients that may have an effect on the safety, or withholding period for the feed or feed ingredients. Manufacturing procedures should be used to avoid cross-contamination (for example flushing, sequencing and physical clean-out) between batches of feed containing restricted or otherwise potentially harmful materials (such as animal by-product meals, veterinary drugs). These procedures should also be used to minimise cross-contamination between medicated and non-medicated feeds and other incompatible feeds.

*Rationale:* Deleting “in particular” makes the sentence clearer.

#### **6.2.3 Monitoring Records**

67. Appropriate records of feed manufacturing procedures followed by on-farm feed manufacturers should be maintained to assist investigations ~~of possible feed related contamination or disease events.~~ should a safety problem emerge.

<sup>11</sup> New additions are underlined; old parts are struck through

*Comment/Clarification:* We have deleted the phrase “of possible feed related contamination or disease events” because it was not clear whether “disease events” refers to animal or human disease or to both animal and human disease. We believe the phrase “should a safety problem emerge” more clearly describes the scope the deleted phrase was attempting to describe.

## **European Community**

### ***Point 65***

The reference to “5.6.1” should be replaced by a reference to “5.6”.

### ***Point 66***

The second and third sentences of the paragraph should be deleted.

COMMENTS: Those sentences are also included in paragraph 49 of section 5. As section 5 is also applicable for manufacturing on-farm it is not necessary to repeat

## **SECTION 6.3 - GOOD ANIMAL FEEDING PRACTICE (PARAS. 69-75)**

### **Australia**

#### **Section 6.3.2**

73. Where agricultural chemicals are used, operators should ensure that the required withholding periods are observed.

This paragraph or an additional paragraph should include a statement that **Agricultural chemicals not approved for treatment of pasture or crops to be grazed should not be used.**

### **Colombia**<sup>12</sup>

#### ***6.3.1 Agua***

El agua potable y el agua destinada a la acuicultura deberá ser de la calidad necesaria para los animales o los peces producidos.

El agua destinada a la ganadería y a la acuicultura, deberá ser de la calidad necesaria para los animales y peces producidos.

Las instalaciones, recipientes y equipos empleados en el almacenamiento y distribución del agua, deben ser elaborados con materiales que no generen riesgo de contaminación química, ni conlleven efectos secundarios para la salud de los animales y los consumidores.

*Nota:* En algunos países la provisión de agua estrictamente potable es muy limitada y se destina fundamentalmente a la población humana, luego estimamos que conveniente recomendar que para la producción animal en general, se emplee agua con la calidad necesaria para garantizar la inocuidad de los alimentos obtenidos de los animales.

#### ***6.3.2 Pastoreo***

72. En los casos que sea procedente, se deberá dejar pasar el lapso de tiempo necesario antes de permitir el pastoreo del ganado en áreas de pastos, cultivos y residuos de cultivos, así como en rotaciones de pastoreo, para minimizar la contaminación cruzada ocasionada por el abono.

En los casos que sea procedente, se deberá dejar pasar el lapso de tiempo necesario antes de permitir el pastoreo del ganado en áreas de pastos, cultivos y residuos de cultivos, así como en rotaciones de pastoreo, para minimizar la contaminación cruzada ocasionada por abonos o fertilizantes químicos.

73. Si se utilizan productos químicos agrícolas, los operadores deberán asegurar la observación de los períodos

<sup>12</sup> Comentarios se encuentran “underlined”seguido del párrafo original.

de retirada requeridos.

Si se utilizan productos químicos como plaguicidas agrícolas, los agricultores deberán asegurar la observación de los periodos de retirada requeridos.

### Switzerland

#### 6.3.3 Feeding

75. *Animals receiving medicated feeds should be identified ~~or~~ and managed separately ....*

Comment:

We think both measures, identification and separation are needed.

### United States<sup>13</sup>

#### 6.3.2 Pasture Grazing

73. ~~Where agricultural chemicals are used, operators should ensure that the required withholding periods are observed.~~

*Rationale:* Delete paragraph 73 because it is covered in paragraph 61.

#### 6.3.3 Feeding

75. ~~Animals receiving medicated feeds should be identified or managed separately until the correct withholding period (if any) has been reached and records of these procedures must be maintained. Procedures to ensure that medicated feeds are transported to the correct location and are fed to animals that require the medication should be followed. Feed transport vehicles and feeding equipment used to deliver and distribute medicated feed should be cleaned after use, if a different medicated feed or non-medicated feed or feed ingredient is to be transported next.~~

*Rationale:* Deleting the word “separately” allows flexibility for the proper management or identification of animals based on different production systems.

### **Section 6.4 - Stable Feeding and Lot/Intensive Feeding Units (paras. 76-79)**

#### Australia

##### **Section 6.4.1**

78. A pest control system should be put in place to control the access of pests to the animal production unit to minimise potential hazards to food safety from feed and bedding materials or culture units.

As feed *per se* does not pose a hazard to food safety, insert **contamination of** before **feed**.

79. Operators and employees working in the animal production unit should observe appropriate hygiene standards to minimise potential hazards to food safety from feed.

As for paragraph 78, insert **contamination of** before **feed**.

### United States<sup>14</sup>

#### **6.4 Stable feeding and lot/intensive feeding units**

76. The animal production unit should be located in an area that does not result in the production of foods of

<sup>13</sup> New additions are underlined; old parts are struck through

<sup>14</sup> New additions are underlined; old parts are struck through

animal origin that pose a risk to food safety. ~~Care should be taken to avoid animal access to contaminated land, and to facilities with lead-based paint and other potential sources of toxicity~~

*Rationale:* The thought behind the second sentence is covered in paragraph 56 and many other examples could be used. It is unclear why lead-based paints are highlighted.

#### 6.4.1 Hygiene

58. A pest control system should be put in place to control the access of pests to the animal production unit to minimise potential hazards to food safety. ~~from feed and bedding materials or culture units.~~

*Rationale:* The phrase was deleted because it was not clear.

#### FEFAC

Par 77

In the last line, the word “storage” should be inserted before “and feeding areas”.

### SECTION 6.5 - ON-FARM PRODUCTION AND USE OF FEED IN AQUACULTURE (PARAS. 80-82)

#### Colombia<sup>15</sup>

##### *6.5 Producción de piensos en las fincas y utilización de piensos en la acuicultura*

80. Esta diversidad se refleja también en la fases desde la larva hasta el adulto, lo que requiere piensos diferentes así como métodos de cultura diferentes.

Esta diversidad se refleja también en la fases desde la larva hasta el adulto, lo que requiere piensos diferentes así como métodos culturales diferentes.

Para asegurar la inocuidad alimentaria se deberían tomar las medidas necesarias respecto a métodos de cultura, áreas de cultura, tecnologías, materiales y piensos empleados para minimizar la contaminación.

Para asegurar la inocuidad alimentaria se deberían tomar las medidas necesarias respecto a métodos de cultivo, áreas de cultivo, tecnologías, materiales y piensos empleados para minimizar la contaminación.

Merece especial atención la calidad del agua utilizada en área de cultura y del agua utilizada para la producción de piensos en las fincas.

Merece especial atención la calidad del agua utilizada en áreas de cultivo y del agua utilizada para la producción de piensos en las fincas.

#### United States<sup>16</sup>

##### **6.5 On-Farm Production and Use of Feed in Aquaculture**

*Comment:* The United States believes that paragraph 80 should be deleted as it is an explanation of aquaculture and is not needed. No other production system is explained.

81. ~~To ensure food safety, necessary precautions should be taken regarding culturing methods, culturing sites, technologies materials and feed used to minimize risk of contamination. Special attention should be paid to the water quality for culturing sites and water used in the production of feed on farms.~~

*Rationale:* The first sentence in paragraph 81 was moved to the end of paragraph 82 because it expanded on what was already in paragraph 82. The second sentence was removed because it is covered in paragraph 70.

82. A Code of Practice for Fish and Fishery Products is currently being developed by the Codex Committee on Fish and Fishery Products. Aquaculture producers should refer to relevant sections of that Code for additional

<sup>15</sup> Comentarios se encuentran “underlined”seguido del párrafo original.

<sup>16</sup> New additions are underlined; old parts are struck through

information. To ensure food safety, necessary precautions should be taken regarding culturing methods, culturing sites, technologies materials and feed used to minimize risk of contamination.

*Rationale:* See explanation for paragraph 81.

40. By-products from wild fish and aquaculture should only be used in aquaculture feed when regarded as safe by national experts based on facts given by competent authorities on the animal health status of the country.

*Rationale:* Paragraph 40 was moved to the Aquaculture section because it is more appropriate in Section 6.5 which is specific for aquaculture.

## SECTION 7 - METHODS OF ANALYSIS AND SAMPLING

### Colombia<sup>17</sup>

#### 7.1 *Muestreo*

83. Es importante asegurar que las muestras sacadas sean representativas del envío o del lote.

Es importante asegurar que las muestras obtenidas sean representativas del envío o del lote.

#### 7.2 *Análisis*

84. Al seleccionar las muestras para su análisis, deberán utilizarse métodos de análisis convalidados que estén basados en principios del Codex y elaborados por autoridades competentes.

Para analizar las muestras seleccionadas, deberán utilizarse métodos de análisis validados, basados en principios del Codex y elaborados por autoridades competentes.

### United States<sup>18</sup>

#### 7.1. Sampling

83. It is important to ensure that the sample taken is representative of the consignment or of the lot. All sampling should be performed using defined sampling procedures based on Codex sampling plans, where available, for the particular commodity/contaminant combination ~~where available~~. Otherwise relevant official methods of sampling as elaborated by international organisations, such as the International Standards Organisation (ISO) and AOAC International, should be used. Where no appropriate international standard exists, sampling methods should be developed and validated using scientifically recognized principles and procedures.

*Rationale:* We suggest moving “where available”. It is more appropriate to place the phrase after “sampling plans.”

## IFIF

### Section 7: Analysis

We feel that it is “... quality control ...” and not “... National Authority Control ...” This Codex document fails to make clear the responsibility of feed manufacturers and others to sample correctly and to carry out quality control in addition to legal controls. Section 7 only refers to work carried out by “control authorities”. There needs to be reference in Section 5/6 to quality control and respective sampling and analysis. Reference to rapid analysis (NIR for example) and sampling systems, while less accurate but rapid, effective and least costly should be referred to within the Code and in Section 5/6 in particular.

<sup>17</sup> Comentarios se encuentran “underlined”seguido del párrafo original.

<sup>18</sup> New additions are underlined; old parts are struck through