

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 13

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Twenty-eighth Session

FAO Headquarters, Rome, 4 – 9 July 2005

MATTERS ARISING FROM REPORTS OF CODEX COMMITTEES AND TASK FORCES

Matters Arising by 19 March 2005

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Clarification of the Reference to “A Reasonable Interval” in the Codex Guidelines for Food Import Control Systems

1. The Committee agreed to recommend to the 28th Session of the Commission to footnote to paragraph 35 of the *Codex Guidelines for Food Import Control Systems* the reference to the WTO Decision WT/MIN (01)/17 in order to clarify the term. (ALINORM 05/28/30, para. 114)
2. The Commission is invited to adopt the addition of the footnote above at Step 8, as amendment of an editorial nature¹.

Proposed Draft Appendices to the Guidelines on the Judgement of Equivalence of Sanitary Measures Associated with Food Inspection and Certification

3. The Committee agreed that work on the appendices to the *Codex Guidelines on the Judgement of Equivalence of Sanitary Measures Associated with Food Inspection and Certification* (CAC/GL 53-2003) should be carried out in a step-wise prioritized fashion.

¹ See paragraph 2 of the *Guide to the Procedure for the Revision and Amendment of Codex Standards, Procedures for the Elaboration of Codex Standards and Related Texts* (Procedural Manual, 14th Edition).

4. It agreed that a Working Group would prepare proposed draft Appendices on “Documentation for evaluation of submissions of requests for equivalence determinations”; “Determining an ‘objective basis of comparison’”; and, “More details on the process of judging equivalence” for consideration at its next session. The development of Appendices on “Assessing which measures are to be the subject of an equivalence determination” and “Terms for on-site visits by importing country authorities undertaking a determination of equivalence” would be carried upon completion of the first three appendices. As regards the Appendix on “Information relating to the need for technical assistance and cooperation between the importing countries to exporting countries”, the Committee agreed that the United States would prepare a discussion paper with a view to identifying which requirements could be developed by the Committee in this regard for consideration at its next Session. (ALINORM 05/28/30, paras 23-25)

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

Risk Management Methodologies, including Risk Assessment Policies in the CCRVDF

5. The Committee recalled the request of the Commission for Codex Committees to complete their work on guidelines on risk analysis in their respective areas and agreed that the discussion paper should be redrafted as a working document for inclusion in the Procedural Manual, with a view to its finalization at the next session. The Committee agreed that the document was being developed in response to a direct request of the Commission and did not need to go through the Step Procedure. (ALINORM 05/28/31, para. 152)

FAO/WHO COORDINATING COMMITTEE FOR LATIN AMERICA AND THE CARIBBEAN

Standard for Canned Sardines and Sardine-Type Products

6. The Committee agreed to communicate to the Executive Committee its concern about the lack of compliance with established procedures and at the same time urged the Commission to approve the inclusion of *Clupea bentincki* among sardine species at its next session. It was also noted that a similar position on this matter had been taken by the Coordinating Committee for North America and the South West Pacific. (ALINORM 05/28/36, para. 113)

Elaboration of a Codex Standard for Parmesan Cheese

7. The Committee agreed that the request for elaboration of a Codex standard for parmesan cheese met all the criteria established by the Committee on Milk and Milk Products (CCMMP) for the elaboration of standards for cheeses, and the criteria for new work specified in the Procedural Manual. The Committee therefore recommended that the 28th Session of the Commission approve as new work the elaboration of a standard for parmesan cheese in the CCMMP. (ALINORM 05/28/36, para. 119)

FAO/WHO COORDINATING COMMITTEE FOR NORTH AMERICA AND SOUTH WEST PACIFIC

Elaboration of a Codex Standard for Parmesan Cheese/ Standard for Canned Sardines and Sardine-Type Products

8. The Committee supported the development of a new Standard on Parmesan cheese and encouraged the Commission to adopt the amendment of the Codex Standard for Canned Sardines and Sardine-Type Products. (ALINORM 05/28/32, para. 105)

FAO/WHO COORDINATING COMMITTEE FOR NEAR EAST

Proposed Draft Standards for Canned Humus with Tehena (Processed Chick Peas with Tehena), Canned Foul Medames (Processed Fava Beans) and Tehena

9. The Committee agreed to finalize the standards for Canned Humus with Tehena (Processed Chick Peas with Tehena), for Canned Foul Medames (Processed Fava Beans) and for Tehena as regional standards and to consider preparing proposals for new work on their conversion to international standards at a later date. (ALINORM 05/28/16, paras 20-22)

THE 27TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

Future Work on Animal Feeding in Codex

10. The 27th Session of the Codex Alimentarius Commission adopted the Code of Practice on Good Animal Feeding and confirmed the dissolution of the *ad hoc* Task Force on Animal Feeding, which had completed its work. The Task Force, while noting that it completed the work on the Draft Code of Practice, agreed that further work in the area of animal feed was needed and that specific project proposals for new work should be prepared and submitted to the Commission for consideration (ALINORM 04/27/38, para. 35).

11. The Commission also endorsed the recommendations of the 54th Session of the Executive Committee (June 2004) that a Circular Letter be prepared to request the views of governments on the areas where future work would be desirable, so that the Commission, at its next Session, could determine whether additional work should be required by Codex on animal feeding and if so, what mechanisms would be most appropriate. (ALINORM 04/27/41, para. 171)

12. In accordance with the decision of the Commission, a Circular Letter was issued (CL 2004/33-CAC "Request for comments on future areas of work on Animal Feeding"). The comments were received from Australia, Canada, Egypt, European Community, New Zealand, Switzerland, United States, Venezuela, EFRA, FEFAC, ICFMH/IUMS and OIE. These comments are reproduced in Annex 1. The Commission is invited to determine whether additional work is required by Codex on animal feeding and if so, what mechanisms would be most appropriate.

THE 55TH SESSION OF THE CODEX EXECUTIVE COMMITTEE

Antimicrobial Resistance

13. The 55th Session of the Executive Committee of the Codex Alimentarius Commission (February 2005) recalled that the 27th Session of the Codex Alimentarius Commission requested its advice on how to deal with antimicrobial resistance related to non-human use of antimicrobials. It noted that the Codex Secretariat had distributed a Circular Letter 2004/32-EXEC requesting comments on what should be achieved by Codex on the issues of antimicrobial resistance and on the mechanisms that should be used to achieve these outcomes. The responses from Members and Observers underlined the increasing risk arising from the non-human use of antimicrobials due to the widespread use of antimicrobials in livestock, aquaculture and horticulture, and were generally supportive of activities aimed at preventing or reducing antimicrobial resistance. While urging the Commission to undertake work on this matter, they however diverged on which mechanisms should be used by Codex.

14. The Executive Committee noted that Codex subsidiary bodies, such as CCRVDF, CCFH and *ad hoc* Task Force on Animal Feeding, had looked at certain aspects of antimicrobial resistance within their respective mandate and that there was a need to establish a mechanism to deal with this matter in a consistent and efficient way.

15. The Executive Committee recommended that the Commission adopt the Code of Practice to Minimize and Contain Antimicrobial Resistance prepared by the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF) and the Guidelines for Cooperation with International Intergovernmental Organizations prepared by the Codex Committee on General Principles (CCGP).

16. The Executive Committee strongly supported Codex work on antimicrobial resistance; it recognised that this work should be undertaken in a holistic manner, should take into account the work already undertaken at national and international level and should be done in close collaboration with the OIE, FAO and WHO.

17. The Executive Committee could not come to a conclusion on the best mechanism to deal with this matter and whether an *ad hoc* Task Force or a joint Working Group of relevant Codex Committees and Task Forces would be more appropriate. It considered that the establishment of an *ad hoc* Task Force would imply a formal decision of the Commission and the allocation of additional resources to the Codex budget. However, such a decision could be made at the next session of the Commission, thereby ensuring timely initiation of work.

18. The Executive Committee agreed that the scope and expected outcome of Codex work on antimicrobial resistance should clearly be delineated before a decision on the procedure can be taken by the Commission.

19. The Executive Committee agreed that the Secretariat, with the contribution of FAO and WHO, would prepare a document containing an analysis of the comments received and the main issues raised, proposals for terms of reference and description of specific work to be carried out; and practical options to achieve this objective, in particular a new Task Force or an Inter-Committee Working Group, for consideration by the next sessions of the Executive Committee and the Commission. (ALINORM 05/28/3, paras 42-52)

20. The Commission is hereby invited to decide on how best to progress work on this subject, taking into account the proposals in Annex 2.

ANNEX 1**Comments Received in Reply to CL 2004/33-CAC
“Request for Comments on Future Areas of Work on Animal Feeding”****AUSTRALIA**

Australia welcomes the opportunity to provide comments for consideration on future areas of work on animal feeding as requested in CL 2004/33-CAC.

Australia was an active contributor to the development of the Codex Code of Practice on Good Animal Feeding, which was adopted last year by the Codex Alimentarius Commission (27CAC July 2004). While the Code took one year longer to complete than originally envisaged, the final product provides a good basis for countries to review and refine their risk-based approach to the management of food safety risks associated with animal feeds.

Australia, like many countries, is presently reviewing its animal feed risk management framework and is using the new Codex Code of Practice as a reference document. The review is being conducted in close consultation with State and Territory Governments and with industry. Given the complexity of the issues associated with animal feeds and the need for full stakeholder engagement, it will be some time before the review process is completed.

In view of the above, Australia believes that further work in Codex on animal feeds is probably premature and that countries should be given time to implement the Codex Code on Good Animal Feeding before embarking on new work in this area.

CANADA

At the 27th Session of the Codex Alimentarius Commission (CAC), the Code of Practice on Good Animal Feeding was adopted. Canada is pleased with the achievement of the Task Force on Animal Feeding and considers the adoption of the Code (CAC/RCP 54-2004) as a significant international development. We note that the Code contains a number of important recommendations to consider in establishing feed safety systems for food producing animals in order to minimize risks to consumers' health.

Canada, as many other Member countries, is currently implementing recommendations consistent with the Code, with a view to enhancing feed safety practices covering the whole food chain. Canada believes that the current focus should be the implementation by Member countries of the recommendations contained in the Code. We consider that it is premature to initiate new and more detailed work in this field as countries are gaining experience in implementing practices consistent with the Code for their own circumstances.

Based on the experience gained by Member countries, and on any new relevant information, the CAC may consider at a later date the opportunity to initiate new work. However, Canada does not support undertaking new work at this time.

EGYPT

Referring to CL 2004/33-CAC, among the areas where future work on animal feeding would be desirable:

- i. Acceptable Limits of different mycotoxins;
- ii. GMOs – Feedingstuffs
- iii. Alternative for Antibiotics as feed additives;
- iv. Acceptable limits for heavy metals in feeds;
- v. Acceptable limits for pesticides residues.

EUROPEAN COMMUNITY

In response to Codex Circular Letter 2004/33-CAC “*Request for comments on future areas of work on Animal feeding*”, the European Community is pleased to offer the following proposal:

1. The purpose and the scope of the Task Force

To develop standards, guidelines, codes or recommendations, as appropriate, for feeds, on the basis of scientific evidence, risk analysis and having regard to other legitimate factors relevant to the health of consumers and to ensure fair practices in the food trade.

2. Its relevance and timeliness

The aim of the Task Force will be to ensure that the proposed future work fits well with other developments in Codex and makes a major contribution to the safety of the feed sector for which other committees have not developed specific standards.

The ad hoc Intergovernmental Codex Task Force on Animal Feeding (2000-2004) produced the draft Code of Practice on Good Animal Feeding. The fifth session of the Task Force forwarded the remaining issues of the draft Code of Practice on Good Animal Feeding to the 27th Session of the Codex Alimentarius Commission for adoption at step 8 and inclusion in the above referred Draft Code. The Task Force, while noting that it had completed the work on the Draft Code of Practice on Good Animal Feeding, agreed that further work in the area of animal feed was needed and that a specific project proposal for new work should be prepared and submitted to the Commission for consideration. The Task Force agreed to refer the above discussion to the Commission with the understanding that it would provide clarification on how to proceed in this regard. In view of these proposals, and of views expressed in the final session of the Task Force, it is essential to continue with further work on animal feed and present a project proposal for discussion to the 27th session of the Codex Alimentarius Commission.

3. The main issues to be covered

The new Task Force should have a lifespan of four years to ensure completion of its work within a reasonable timeframe.

Keeping the scope of the work science-based, the Task Force should focus on three specific topics:

The three topics to be addressed are as follows:

- a) application of the HACCP system for feed and feed ingredients in relation to the principles set up in Section 4 of the Code of Practice on Good Animal Feeding²;
- b) development of detailed rules for a global system for exchanges of information in feed control emergency situations or on rejection of imported feed; and
- c) minimisation of the presence of undesirable substances in animal feed: establishment of maximum levels and development of Codes of Good Practice.

This will facilitate the achievement of the goal of the new Task Force in producing useful outputs within the limited resources.

4. An assessment against the criteria for the establishment of work priorities

The food standards adopted by the Codex Alimentarius aim to protect consumer health and ensure fair practices in the food trade. The food chain is becoming increasingly complex. Every part of the chain must be as strong as the others if we want to protect human health. It is essential to assess and monitor the risks to consumer health associated with the use of different feed ingredients as well as those associated with feed processing, feed production and trading practices.

² CAC/RCP 54-2004

All the food scares with products of animal origin, especially those deriving from animal feed, demonstrate that Codex standards should follow a comprehensive and integrated approach along the food chain. Feed is an essential element in the food chain that needs to be addressed as comprehensively as any other. The safety of foods of animal origin, their potential risk to consumer health and fair practices in the food trade must be fully considered. There is no internationally uniform national legislation in this area. Therefore this proposal is consistent with the Criteria for the Establishment of Work Priorities as set out below.

Criteria applicable to general subjects

- (a) Consumer protection from the point of view of health and fraudulent practices.

The current draft Code of Practice on Good Animal Feeding is a good instrument aimed at improving food safety. Nevertheless, some aspects are not covered by the Code and need to be properly addressed in order to strengthen consumer protection and prevent the introduction and development of fraudulent practices.

Specific HACCP systems have been designed for the food chain, and the guidelines for implementation of HACCP principles have mainly focused on the food industry. Codex should encourage developments towards the application of HACCP principles in the feed sector along the different steps of the feed chain. Section 4 of the Code of Practice on Good Animal Feeding emphasises the importance of the application of HACCP principles in feed.

Feed-specific HACCP guidelines will help improve feed hygiene conditions, increase confidence in the food supply and reduce barriers to international trade. Often feed materials that are safe *per se* may undergo processing, transport, storage, etc under poor hygienic conditions and become unsafe. The Codex Committee on Food Hygiene (CCFH) only covers in its terms of reference the aspects related to food hygiene; therefore it is wholly justified that the new Task Force should develop minimum standards for feed hygiene. Other committees have stressed the importance of aspects related to feed hygiene in the context of food safety: for example, in the tenth session of the Codex Committee on Meat Hygiene (CCMH) the Codex Working Group endorsed the proposal to insert a reference to the last CCMH report: ALINORM 04/27/16 Appendix II Page 37:

“29. There is a need for collaboration between all parties involved in feed production, feed manufacturing and use so as to establish any linkage between identified hazards and level of risk to consumers that may result from transmission through the food chain”

The feed sector requires a system that will provide the control authorities with an effective tool for exchange of information on measures taken to ensure food safety. The development of a global system to exchange information is critical for limiting the spread of a food safety problem and to allow the implementation of appropriate measures in a timely fashion. The Task Force should take into consideration at least the following elements: scope, objectives, criteria for notification and types of notification, establishment of official contact points; and minimum information required in a notification.

Guidance to exchange information is not new in the food sector but it has not been developed in the case of feed. The Task Force should perform this task in line with the works already performed by the Codex Committee on Food Import and Export Certification and Inspection Systems (CCFICS), in particular the Guidelines for Exchange of Information between Countries on Rejection of Imported Food³ and the Guidelines for Exchange of Information in Food Control Emergency Situations⁴. The CCFICS has focused on food, therefore aspects related to feed should be developed by the Task Force in collaboration with CCFICS.

A working group created by the Task Force on Animal Feeding identified various groups of substances that have direct impact on human health and for which maximum levels should be established for toxic substances such as heavy and other metals (e.g. cadmium and arsenic); toxins (e.g. mycotoxins); dioxins, furans and dioxin-like PCBs; and maximum limits for pesticide residues. Many of these substances are hazardous because of their high persistence, bioaccumulation and toxicity.

³ CAC/GL 25-1997

⁴ CAC/GL 19-1995

The Global Stockholm Convention has recognised some persistent organic pollutants that, amongst others, can be present in animal feed. Other international organisations, such as the United Nations Economic Commission for Europe, have also developed the Protocol to the Convention on Long-range Transboundary Air Pollution, which refers to different substances that may be present along the food chain.

The Task Force should therefore focus on these substances which are of the greatest concern and develop Codes of Good Practice to facilitate the implementation of appropriate measure to minimise their presence.

In the report of the third session of the Task Force it was noted that most of the data presented by the relevant Codex committees, in particular maximum levels for contaminants, did not refer to feed and feed ingredients. Since its first session in 1964, the Codex Committee on Food Additives and Contaminants (CCFAC) has only discussed the presence of dioxins in feed. The Task Force would use its expertise to establish MRLs/EMRLs for feed and report to the relevant Codex committees.

- (b) Diversification of national legislation and apparent resulting or potential impediments to international trade.

As the proposed topics are not included in any international standards, guidelines or recommendations, there would be divergent national standards which could be potential impediments to international trade of feed.

- (c) Scope of the work and establishment of priorities between the various sections of the work.

The scope of the work is mentioned in section 2 of this document. The main aspects that need to be covered are also referred in section 3 of this document. The Task Force in its first session should decide on the prioritization of the work.

- (d) Work already undertaken by other international organisations in this field.

There is no global organisation that produces international standards for animal feed. The work performed in this field by other international organisations, such as the FAO, does not address the proposed topics.

5. Relevance to the Codex strategic objectives

The new work proposed would contribute to the safety of human health and to ensuring fair practices in the feed trade by satisfying the following objectives in the “Strategic objectives and Priorities” (CAC Strategic Framework 2003-2007).

- | | |
|--------------|---|
| Objective 1: | Promoting sound and regulatory frameworks. |
| Objective 2: | Promoting widest and consistent application of scientific principles and risk analysis. |
| Objective 3 | Promoting linkages between Codex and other Multilateral Regulatory Instruments and conventions. |
| Objective 4 | Enhancing capacity to respond effectively and expeditiously to new issues, concerns and developments in the food sectors. |
| Objective 6: | Promoting maximum application of Codex standards. |

The previous Task Force left unaddressed several important aspects that need to be addressed by the new Task Force.

6. Information on the relationship between the proposal and other existing Codex documents

The previous Task Force produced the draft Code of Practice on Good Animal Feeding. The texts expected to be drafted by the new Task Force will also be developed in a similar manner and build upon the good work already completed.

The proposal identified in item 3 covers various areas of work for which it is necessary to take full account of, and collaborate with, other Codex committees or international bodies. As regards Codex Committees, the work done by CCFH, CCMH and CCFICS is of particular importance.

7. Identification of any requirement for, and availability of, expert scientific advice.

An FAO/OIE/WHO expert consultation may be required, depending upon the detailed aspects to be covered by the new work that will be identified at the first Task Force meeting. The organisations cited undertake some activities related to animal feeding and their appropriate and timely scientific input might be required.

8. Identification of any need for technical input to the Task Force from external bodies so this can be planned for.

See item 7

9. The proposed time-line for completion of the new work, including the start date, the proposed date for adoption at step 5 and the proposed date for adoption by the Commission; the time frame for developing a standard should not normally exceed five years.

The proposed time frame is 4 years (one session per year). The first session of the Task Force will be convened the following year (during the last quarter) after the decision to approve the new work is taken by the CAC. Adoption at step 5 will be at the latest at the third session of the Task Force, with adoption at step 8 by the CAC the following year.

For the sake of coordination it is proposed, where applicable, to submit the proposed drafts at step 4 of the procedure to other relevant Codex committees

Draft terms of Reference for the project proposal for the new *Ad Hoc* Intergovernmental Task Force on Animal Feeding**Objectives**

To develop standards, guidelines, codes or recommendations, as appropriate, for feeds, on the basis of scientific evidence, risk analysis and having regard to other legitimate factors relevant to the health of consumers and to ensure fair practices in the food trade.

Time frame

The Task Force shall complete its work within four years.

Terms of reference

- (a) to extend the Code of Practice for Good Animal Feeding to develop guidelines on HACCP (Hazard Analysis and Critical Control Points);
- (b) development of detailed rules for a global system for exchanges of information in feed control emergency situations or on rejection of imported feed;
- (c) minimisation of the presence of undesirable substances in animal feed: to establish maximum limits in feed for undesirable substances which are transferable to the ultimate human consumer and are carcinogenic, mutagenic and/or bio-accumulative or otherwise injurious to health; and to develop Codes of Good Practice.
- (d) to take full account of, and collaborate with, other Codex committees and relevant international bodies, including FAO, WHO, OIE and IPPC.

NEW ZEALAND

The New Zealand Government would like to make the following comments:

New Zealand considers that, given the lack of technically sound information on the adverse impact of many substances in feed commodities on the safety of foods, it is premature to initiate new work in the area of animal feeding. The Commission has only recently adopted the Code of Practice on Good Animal Feeding and members need more time to build up experience in the implementation of the Code before embarking on the development of further guidance. Countries are still assessing their present systems and response to the new Code of Practice on Good Animal Feeding.

New Zealand also considers that the Commission already has a heavy workload and its first priority must be to focus on critical food safety issues before embarking on new work in the animal feeds area. It is also important to ensure that the Commission's priorities in the area of animal feeding are determined in consultation with the OIE priorities.

SWITZERLAND

1. The purpose and the scope of the Task Force

To develop standards, guidelines, codes or recommendations, as appropriate, for feeds, on the basis of scientific evidence, risk analysis and having regard to other legitimate factors relevant to the health of consumers and to ensure fair practices in the food trade.

2. Its relevance

There is no international organization that develops world wide standards for animal feeding. Therefore, the work within the Codex Alimentarius about feed and feed ingredients is very important and will set international standards. The aim of the new Task Force will be to ensure that the proposed future work fits well with other developments in Codex and that it makes a major contribution to the safety of the feed sector for which other committees have not developed specific standards.

3. The main issue to be covered

The new Task Force should complete its mandate within a limited time frame of not more than four years. Switzerland proposes that the new Task Force should cover the topic of the application of the HACCP system for feed and feed ingredients. The HACCP system should be based on the principles set up in Section 4 of the Code of Practice on Good Animal Feeding (CAC/RCP54-2004).

UNITED STATES OF AMERICA

The United States appreciates the opportunity to address the Codex Alimentarius Commission's request for comments on possible future work on animal feeding (CL 2004/33).

The U.S. notes that the 54th Session of the Executive Committee recommended that the Commission at its 28th Session determine whether additional work would be required and what mechanisms would be most appropriate.

Considering that countries are still assessing their present systems and responses to the recently adopted Codex Code on Good Animal Feeding, the U.S. feels that the Commission should allow more time for member countries to investigate their current situation relative to the Code. Also Codex should carefully evaluate the priority of work on animal feed against other more pressing food safety issues.

If additional topics relating to animal feeding warrant consideration, Codex should consider whether such work could be assigned to existing Codex subsidiary bodies, thus avoiding the need for a Task Force, which would require the use of valuable Codex resources.

In response to suggested topics that surfaced during the previous Task Force's deliberations the U.S. offers the following comments:

1. Application of HACCP Systems in the Processing of Food and Feed Ingredients

HACCP is one of several approaches that can be used to produce safe feed for food-producing animals. The current Code of Practice references HACCP as defined in the Annex to the Recommended International Code of Practice on General Principles of Food Hygiene. The proposed Annex to the Feed Code of Practice would essentially be a duplication, replacing "food" references with "feed and feed ingredient" and "consumers and consumption" with "animals". No other standing Codex Committee or Task Force has included a HACCP annex; rather they reference the General Principles of Food Hygiene. The U.S. does not believe that it would be time or money well spent to use a Task Force to develop a HACCP-related document for use in the processing of food and feed ingredients.

2. Development of Detailed Rules for Rapid Alert Systems in Feed

This subject should be addressed by country-to-country arrangements through agreed upon certification and inspection systems. The U.S. notes that the Codex Alimentarius Commission, at its 27th (2004) Session, based on work carried out by Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS), adopted a revision to the Codex *Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations*. This revision extends the scope of the document to cover feeding stuffs for food producing animals. The U.S. believes this revision adequately addresses concerns relating to a rapid alert system for feed. However, should any additional work be considered necessary, such work would appropriately be undertaken by CCFICS.

3. Minimization of Undesirable Substances, such as heavy and toxic metals, mycotoxins, dioxins, furans and dioxin like PCBs, pesticides and zoonotic pathogenic agents

Many of these suggested undesirable substances are being addressed by existing Codex Committees such as Pesticide Residues and Food Additive and Contaminants. The U.S. recommends that the existing committees continue their work on these substances. Additional work can be considered by these committees, as appropriate, on a case-by-case basis, based on their overall priority with respect to the work of Codex. The Commission could encourage research into hazard/negative effects associated with animal feeding that affect the safety of food.

VENEZUELA

Venezuela wish to continue work to complete and extend the Code of Practice on Good Animal Feeding. Venezuela proposes to extend the study on the toxicological effects of aflatoxins contamination of animal feed.

EFPPRA (EUROPEAN FAT PROCESSORS AND RENDERERS ASSOCIATION)

EFPPRA, the European Fat Processors and Renderers Association, has carefully examined the European Community comments and has come to the conclusion that it fully endorses them.

We trust that the Codex Alimentarius Commission will give the European Community's comments their positive consideration.

FEFAC (FÉDÉRATION EUROPÉENNE DES FABRICANTS D'ALIMENTS COMPOSÉS / EUROPEAN FEED MANUFACTURERS FEDERATION)

FEFAC, representing 22 national compound feed manufacturers associations in 21 EU Member States, would like to offer its comments and proposal regarding the Codex request for comments on future areas of work in animal feeding.

1. General comment on the role of Codex regarding the development of global feed safety standards

We believe that the further development of global feed safety standards is fully consistent with the mission of Codex to ensure a safe food supply to consumers while fostering international trade. Repeated incidents of feed-safety related food contamination and the work of the previous ad-hoc intergovernmental Codex Task Force on Animal Feed have clearly established the fact that feed safety is essential for a safe supply of food products of animal origin.

International trade in feedingstuffs is the third largest global commodity trade after mineral oil and coal by volume. The European Union alone imports more than 50 Mio tons of feedingstuffs annually due to its ever increasing deficit in vegetable proteins (> 80%). Global feed standards are thus an essential prerequisite for the sustainable development of international trade in feedingstuffs.

From our experience with the present working structure of the Codex Alimentarius Commission and its subsidiary Committees, we have noted that the main Standing Committees, which are seconded to develop feed safety standards (CCFAC, CCVRDF) were not well equipped to deal with arising feed safety issues in a consistent manner. We believe this may be due to a lack of feed regulatory expertise at the level of the chair and

in the national delegations, which are largely dominated by food regulators with no or limited experience in feed production methods.

We do recognise that the ad-hoc Intergovernmental Codex Task Force on Animal Feeding did gather the best available feed regulatory expertise at global level for the purpose of developing the Codex code of practice on good animal feeding, but fear that this expertise may be lost to Codex unless national delegations are prepared to integrate this expertise systematically in their delegations.

Given the close interaction of food and feed production, with animal feed providing a key market for food co-products, Codex needs to take due account of the impact of any food standard setting activity on safe feed supply. Otherwise food safety standards may be developed to the detriment of feed safety ultimately endangering the safe supply of foodstuffs of animal origin.

To provide only one example of the current biased food safety standard setting activity at Codex level we may refer to the Codex discussion on reducing maximum levels for lead content in potatoes, which is technically possible due to better cleaning methods of potatoes (brushing and peeling processes). This discussion ignored the fact the “brush and peel” of potatoes will end up in animal feed with an increased contamination load of lead, which could lead to exceeding the limits for meat products due to high carry over from feed to food in the absence of Codex guidance on maximum limits for lead in feed.

We therefore call upon Codex to review its risk assessment methodology used by JECFA towards an integrated risk assessment, which takes into account feed safety as well as food safety concerns.

2. Future areas of Codex work on animal feeding

On the basis of our general comments and observations regarding the current working procedures and priorities at Codex level, we would therefore strongly welcome continued Codex standardisation activities in the following areas :

- Setting of maximum limits and development of codes for practices for the source-oriented reduction of contaminants present in the feed supply chain with an established carry over from feed to food (e.g. POP's, certain mycotoxins, heavy metals, arsenic and fluorine etc).
- Development of specific food and feed sector guidance for the implementation of minimum standards for feed hygiene: every food producer is also a feed supplier, either in supplying food co-products or “out of specification” products to the feed chain, often to farmers who have no analytical means to check safety of their feed supply. These food producers must be made aware of specific feed safety risks (contaminants, pathogens or presence of certain food additives, which may be a risk to certain animal species) and the need to implement adequate HACCP-based feed safety assurance systems. We also recognise the need for a continued review and update of the existing Codex code of good practice for animal feeding for which currently no mandate is provided by the CAC to any standing committee (CCFH only deals with food hygiene).
- Expanding the global exchange information system to emerging feed safety incidents according to the existing Codex guidelines for Exchange of Information in Food control emergency Situations.

We are fully aware about the continued need for close cooperation between Codex, OIE, WHO and the IPPC in areas where feed safety may be linked directly or indirectly to animal health issues, food-borne epidemics and environmental safety. We would strongly encourage Codex to take a proactive role to facilitate such cooperation where appropriate as recently demonstrated on the issue of the use of antimicrobial substances in food animal production.

3. FEFAC proposal for the setting up of a CODEX Task Force on animal feeding

For the above-mentioned reasons, FEFAC endorses the proposal of the European Community (CX 2/7) inviting Codex to consider setting up of new Task Force on animal feeding, which should deal with the identified work items.

We would like to stress again however our preference for a permanent forum for discussion of global feed safety standards at Codex level to ensure that feed safety issues are part of an integrated risk assessment approach at JECFA level and the subsequent risk management decision at Codex Committee level. This could be achieved in our opinion, by reviewing and possibly extending the current mandate of existing Standing Codex Committee, in particular for CCFH, CCMH and CCGP.

IUMS (INTERNATIONAL UNION OF MICROBIOLOGICAL SOCIETIES)

ICFMH, on behalf of IUMS, supports and encourages continuation of the work of the *ad hoc* Task Force on Animal Feeding.

In ALINORM 04/27/38, para 35, in the Report of the *fifth* session of the *ad hoc Intergovernmental Codex Task Force on Animal Feeding*, items are outlined for future work:

Application of the HACCP system in the processing of feed and feed ingredients

- Drawing up of a negative list
- Development of detailed rules for a global rapid alert system for feed; and
- Minimisation of undesirable substances.

All of the mentioned subjects are indeed very important for the manufacture of safe food and very relevant to the *Purpose and Scope* as formulated in the *Code of Practice on Good Animal Feeding*.

Justification for future work is hardly necessary. But it might be mentioned that feed has been a source of some of the most spectacular outbreaks of disease both in man and animals over half a century. In 1959, a singular event occurred which initiated the international interest in mycotoxins, being the cause of death of several thousands of turkey poults. Today we know this was caused by aflatoxin present in groundnut meal used as protein supplement in the pelleted feed.

Mycotoxins in feed still remain a major threat to food safety, and many details need to be elucidated e.g. prevention by application of the HACCP principle, detoxification possibilities, etc., etc.

Change in the technology of the manufacturing of meat and bone meal caused the bovine BSE epidemics in the UK and Europe and the subsequent discovery that vCJD in young adults and teenagers was caused by BSE exposure.

Feed remains an important source of *Dioxins* in the food supply and the relative importance of feed needs to be clarified. Dioxin formation during feed processing has resulted in low levels in animal feed mineral supplements formed during heating processes justifying continuous interest in the technology applied in feed manufacturing.

The importance of feed in the epidemiology of salmonellosis in both man and animal is well established and it still constitutes a threat to man. Less well known is the importance of feed in the epidemiology of several other zoonotic agents such as *Listeria*, *Campylobacter* and several others.

The same philosophy may apply to contagious animal diseases. Silage of poor hygienic quality has for example been shown to cause not only animal disease but also to be responsible for an increased prevalence of *Listeria* in raw meat.

The above mentioned details are far from complete, but only serve as examples of the need for future work.

The last of the four issues (“items”) listed above ought to be extended to cover not only undesirable substances but also to include minimisation of microbial agents of importance for disease in man and animal.

ICFMH is of the opinion that there is both a need and scientific justification for the establishment of a new *Codes Committee on Animal Feed*.

The farm-to-fork concept is well recognised in our contemporary world, and feed is indeed one the most important links within the concept. A new Codex Committee on Animal Feed would be just as important as the presently existing and well established Codex Committees.

OIE (WORLD ORGANIZATION FOR ANIMAL HEALTH)

Introduction

The need to cover the entirety of the food chain, from the animal production phase to the consumer with a global approach, is acknowledged by all Member Countries of the OIE and *Codex Alimentarius*. As a result the OIE has focused on the animal production phase of the food chain for animals and animal products, in coordination with *Codex Alimentarius*. This contribution includes the OIE participation in the work of the *ad hoc* Task Force on Animal Feeding. This collaboration was necessary in order to avoid adopting contradictory standards, to close any remaining gaps in existing standards and to work together to obtain input from the widest possible networks of experts.

The OIE has recently renewed its formal agreements with both FAO and WHO in order to facilitate coordination with *Codex Alimentarius'* parent organisations. Our collaboration with *Codex Alimentarius* is currently coordinated by the OIE "Working Group on Animal Production Food Safety". The Chairperson and the Secretary of the *Codex Alimentarius* Commission, Dr Stuart Slorach and Dr Kazuaki Miyagishima, as well as the Chairperson of the Committee on Meat Hygiene, Dr Andrew McKenzie, are members of this Working Group, which also includes four high level national members working in the Veterinary Services of OIE Member Countries in Africa, the Americas, Europe and the Middle East, as well as a representative of the WHO (the Director of the Food Safety Department).

This OIE "Working Group on Animal Production Food Safety" has produced a draft Guide to Good Farming Practices which addresses all hazards, both public health and animal health, present during the animal production phase. This draft has been circulated for OIE Member Countries' comments.

The development of a guidance document for the OIE Director General on the dual functionalities of Veterinary Services in both animal and public health throughout the food chain has been undertaken. This paper provides Governments and Veterinary Services with a bridge between the implementation of standards of both the OIE and *Codex Alimentarius* relating to microbiological safety and hygiene of animal products, because there is a worldwide continuing need to meet both animal and public health objectives. This is being followed by a paper providing more detailed guidance on the development of a new approach to *ante-* and *post-mortem* inspection.

OIE Position

The OIE has actively contributed to all meetings of the *Codex Alimentarius ad hoc* Task Force on Animal Feeding and welcomes the adoption by the *Codex Alimentarius* Commission (CAC) of the Code of Practice on Good Animal Feeding.

This Code of Practice fulfils the objectives of the Task Force. Indeed it helps to ensure the safety and quality of foods of animal origin by addressing public health issues linked with animal feeding. Therefore, the OIE does not believe there is any need for further work on animal feeding by *Codex Alimentarius*.

Although the assignment was successfully completed, the animal health aspects of animal feeding were not considered, due to the difference in competences between *Codex Alimentarius* and the OIE. To fulfil the mandate received from its 167 Member Countries, the OIE is addressing both public health and animal health issues present during the animal production phase of the food and feed chain for animals and animal products. As mentioned before, the draft Guide to Good Farming Practices, being produced by the OIE "Working Group on Animal Production Food Safety", will also cover those aspects, complementing the work of CAC. In its work the "Animal Production Food Safety Working Group" is mindful of the progress done by other relevant bodies, notably *Codex Alimentarius* committees and working groups, and cross-references are made between OIE and *Codex Alimentarius* International Standards. This has already been done in the Draft Code of Hygienic Practice for Meat by the CCMH. In the spirit of avoiding gaps and duplications, this practice should continue in both standard setting organisations.

ANNEX 2**Proposals for the Terms of Reference and Expected Outcomes of Codex Work on Antimicrobial Resistance and Practical Options to Achieve it****(Prepared by the Secretariat with the Contribution of FAO and WHO)*****A. Purpose***

1. Codex should develop science-based guidance to reduce the risks to human health associated with the presence in food and the transmission through food of antimicrobial resistant microorganisms and antimicrobial resistance genes.

B. Scope

2. The outcome of Codex work in this area would be guidance in the form of principles, guidelines and other recommendations to reduce the risks of anti-microbial resistance related to food including specific management options for risk reduction, based on the risk assessment provided by FAO/WHO through JEMRA, with the support of the OIE expertise. This could include management strategies to prevent the emergence and dissemination through food of microorganisms resistant to - or genes conveying resistance to - critically important antimicrobials for the treatment of human disease.

3. To achieve this outcome, a first step would be the preparation of a Risk Profile enabling definition of the purpose and scope of one or several specific anti-microbial resistance risk assessments to be executed by JEMRA (Joint FAO/WHO Expert Meeting on Microbiological Risk Assessment) with the support of OIE expertise. This should include the review and consolidation of existing documents and available relevant data. The Risk Profile should address both antimicrobial resistant microorganisms and antimicrobial resistance genes in food. It would include preliminary consideration of data on antimicrobial use and prevalence of bacterial species with significant anti-microbial resistance in primary food production (animals and crops) and in food at the retail level as well as documentation of potential links to human disease outcome. The Risk Profile, as well as additional inputs, e.g. WHO, FAO and OIE inputs related to critically important antimicrobials, would lead to a suggested scope for risk assessment work.

4. The second step would be the definition of a Risk Assessment Policy for antimicrobial resistance, including the development of a specific Codex guideline for risk assessment of antimicrobial resistant microorganisms based on the existing Codex microbiological risk assessment guidelines as well as OIE guidance for risk assessment.

5. The third step would be the commissioning of the risk assessment or risk assessments to be performed by JEMRA.

6. The fourth and final step would be the development of specific risk management guidance (including as appropriate principles, guidelines and other recommendations) in order to reduce the risk relative to the emergence and dissemination of antimicrobial resistant in microorganisms through food, taking into account the outcome of the risk assessment(s) provided by JEMRA.

C. Activities

7. The activities required will include the following:

(Preparatory stage)

- Produce a Risk Profile to be used to define and focus work towards the areas of highest public health importance and/or highest potential for prevention;
- Define a Risk Assessment policy for use by FAO and WHO (JEMRA) for the area;
- Assign a specific task for one or several anti-microbial resistance risk assessments as appropriate to be performed by JEMRA, combined with additional expertise as appropriate;
- Define the need for data to be collected and analyzed to carry out risk assessments.

(Output stage)

- Based on the outcome of the risk assessments, as well as ongoing work from OIE, FAO and WHO on critically important antimicrobials, Codex should develop appropriate guidelines and/or other documents to achieve set targets on reduction of risk.

D. Possible options to undertake proposed work

(1) Task Force Option

Timeline:

8. A Codex “Task Force on Antimicrobial Resistance as it Relates to Food” could be established for a four-year period and would work with the support of OIE expertise. The modalities for a Codex Task Force are as defined in the Procedural Manual⁵ and the suggested timeline is dependent on a decision at the present session of the Commission and the acceptance by a Government to host this Task Force⁶.

Possible implications:

9. The creation of this new Task Force while facilitating a focus on the issue of antimicrobial resistance by Codex, would mean the establishment of an additional subsidiary body of the Commission, with its consequences in terms of workload for the Secretariat and travel to meetings for the delegates. It would also have a definite financial impact which need to be considered against other priorities.

(2) Inter-Committee Working Group Option

Timeline:

10. An Inter-Committee Working Group could be set up between CCFH, CCRVDF and CCPR. It would be supported by OIE expertise. The decision to establish such a Working Group may be taken directly by the Commission. The Working Group would have a lifespan of approximately four years (divided possibly in two periods of two years each) and would report back to the Commission through the Committee(s). Although there is no defined protocol in the Procedural Manual for an Inter-Committee Working Group, the modalities for the work of this Working Group should follow relevant guidelines for working groups⁷. The Commission may request the host government secretariat of one of the Committees involved to arrange for the initiation of work and for the operation of the Working Group.

Possible Implications:

11. This option while less costly (if meeting of the Working Group are held in conjunction with regular sessions of the relevant Committees), may create additional burden to the relevant Committees, especially the host government. Also, the fact that the Committees in question have different timing and frequency of meetings and relatively long agendas may delay the process. To minimize such delay, one Committee could be designated as the lead Committee to advance the work, while the others would be invited to comment on the draft text(s) at appropriate stages. It should, however, be considered whether the working modalities of a Working Group could support the full scope of work as outlined in this document, specifically the need for interaction between risk assessors and risk managers in this specific area.

⁵ Section II “Guidelines for Codex Committee and Task Forces” and “Criteria for the Establishment of Subsidiary Bodies of the Codex Alimentarius Commission” (Procedural Manual, 14th Edition).

⁶ The 27th Session of the CAC noted that the Republic of Korea offered its services to host this Task Force if it was to be established in the future. Prior to formally establishing a Codex Task Force, its objectives, terms of reference and time frame need to be approved by the Commission.

⁷ Draft Guidelines for Physical Working Groups and draft Guidelines for Electronic Working Groups (ALINORM 05/28/33, Appendices V and VI).