codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

CX 2/7.2 **CL 2008/40-CAC Addendum**
January 2009

TO: Codex Contact Points
Interested International Organizations

FROM: Secretary,
Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme,
Viale delle Terme di Caracalla,
00153 Rome, Italy

SUBJECT: **Addendum to CL 2008/40-CAC "Request for comments on proposals for the Scope and Terms of Reference of Future Work on Animal Feeding and Suitable Mechanisms for Codex to Carry out this Work (to be considered at the 32nd Session of the Codex Alimentarius Commission)"**

Addendum à la CL 2008/40-CAC « Demande de observation sur les propositions concernant le champ d'application et le cadre de référence des travaux futurs sur l'alimentation animale et sur les mécanismes appropriés qui permettraient au Codex d'effectuer ces travaux (pour examen à la trente-deuxième session de la Commission du Codex Alimentarius) »

Addendum a la CL 2008/40-CAC « Recabado de observaciones sobre propuestas relativas al alcance y el mandato de los futuros trabajos sobre alimentación animal y sobre mecanismos apropiados para que el Codex realice este trabajo (para examen por parte de la Comisión del Codex Alimentarius en su 32º período de sesión)"

BACKGROUND

Please find attached Annexes II and III of the report of the Electronic Working Group on Animal Feed. Annexes II and III include respectively the English, French and Spanish version of first draft and second draft prepared by the e-WG along with comments submitted.

INFORMATIONS GÉNÉRALES

Veuillez trouver ci-joint les Annexes II et III du rapport du Groupe de travail électronique sur l'alimentation animale. Les Annexes II et III comprennent respectivement la version en anglais, français et espagnol du premier et deuxième avant-projet rédigés par le Groupe de travail électronique ainsi que les observations soumises.

ANTECEDENTES

Sírvase encontrar adjunto los Anexos II y III del informe del Grupo de trabajo por medios electrónicos sobre alimentación animal. Los Anexos II y III incluyen respectivamente las versiones en inglés, francés y español del primer y segundo borradores preparados por el Grupo de trabajo por medios electrónicos junto con las observaciones presentadas.

Annex II

Codex Electronic Working Group
on Animal Feed

1st draft document (Spanish/French/English) and comments received to this document

Comments from: Argentina, Australia, Brazil, Canada, France, Germany, Iran, Ireland, Netherlands, New Zealand, Norway, Thailand, United Kingdom, United States, European Community, European Feed Manufacturers' Federation (FEFAC), International Dairy Federation (IDF), International Feed Industry Federation (IFIF), World Renderes Organisation (WRO)

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WORKING DOCUMENT

Proposal for the scope and terms of reference of future work on animal feeding

At the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007) it has been pointed out that current Codex Food Safety Risk Assessment Methodology is not adequate to address food safety-related feed-safety issues. Producers around the world face the reality that different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Based on the deliberations and recommendations made by the experts in Rome, the report issued by FAO on February 2008, and accordingly to the agreement reached at 31st CAC in Geneva, Switzerland, an *Ad Hoc* Intergovernmental Task Force on Animal Feeding (TFAF) should be established in order to:

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks.
- Work on harmonisation of risk management tools in order to ensure safe food and fair trade.

The terms of reference for the TFAF should be to:

1. Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients. The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis[1] and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment[2]; the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods[3].**(ii)**

2. Develop standards for feed and feed ingredients with respect to food safety. In doing so the working group should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety[4] and countries specific needs for further evaluation on specific hazards by international scientific expert committees.**(iii)**

3. a) Review the existing Codex Codes[5] regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety. In doing so the working group should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed. Furthermore the working group should list all available options on risk management tools and make proposals for risk-proportionate risk management measures. **(x)**

   b) Establish criteria for the identification of emergency situations. Such criteria is essential in systems by which to exchange information on feed safety emergency situations (e.g. INFOSAN) *(see page 3 "FAO iniciative" – third bullet).*

   c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards *(see page 3 "FAO iniciative" – third bullet),*

4. Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals[6], which also encompasses feed, in order to include specific provisions related to feed safety. **(iv)**

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[1] FAO/WHO, 2006. *Codex Alimentarius Commission procedural manual,* Seventeenth edition. Joint FAO/WHO Food Standards Programme. Rome. (Available at ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17e.pdf).

[2] FAO/WHO, 2001. *Principles and guidelines for the conduct of microbiological risk assessment.* Food and nutrition/Codex Alimentarius – Joint FAO/WHO Food Standards Programme, Rome. (Available at http://www.codexalimentarius.net/download/standards/357/CXG_030e.pdf).

[3] FAO/WHO. 2007. *Codex Alimentarius principles for risk analysis,* (Procedural manual of the Codex Alimentarius Commission), Seventeenth edition. Joint FAO/WHO Food Standards Programme. Rome. (Available at ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17e.pdf).

[4] FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety.* Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf)

[5] *Principles and guidelines for the exchange of information in food safety emergency situations* (CAC/GL 19-1995) (Available at http://www.codexalimentarius.net/download/standards/36/CXG_019e.pdf). *Guidelines for the exchange of information between countries on rejection of imported food* (CAC/GL 25-1997) (Available at www.codexalimentarius.net/download/standards/353/CXG_025e.pdf). *Principles for traceability/product tracing as a tool within a food inspection a certification system* (CAC/GL 60-2006) (Available at www.codexalimentarius.net/download/standards/10603/CXG_060e.pdf).

[6] FAO/WHO. 2001. *Code of practice for source directed measures to reduce contamination of food with chemicals* (CAC/RCP 49-2001). Rome. (Available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf).

5. The working group should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.

Considering the recommendations, the following issues should be analyzed under the scope of the specific Committees:

CCMAS (vi) should develop inexpensive and accurate screening methods for the detection and quantification of dioxins, dibenzofurans and dioxin-like PCBs in feed and feed ingredients.

CCMAS (vii) should develop rapid and semi-quantitative screening methods for detection of aflatoxin B1 in both feed and feed ingredients. The methods should be simple enough for use by non-technical personnel and inexpensive so as to encourage their use.

Research by Experts from FAO and WHO should be focused on:

1. Research on rates of transfer and accumulation of dioxins, dibenzofurans, and dioxin-like PCBs from feed to edible tissue in animal-derived products and management measures should be continued. **(v)**
2. Determining the fate and residual concentration of aflatoxin B1 and any antibiotics used to control unwanted microbial growth during the biofuels fermentation process. Research is also needed to evaluate the risk of residual levels of methanol in glycerol from biodiesel production when it is used as a feed ingredient, particularly in dairy production. **(ix)**

FAO iniciative (training, capacity building, etc.)

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks. **(i)**
- Communication should be improved to raise the awareness among biofuel (e.g. ethanol and biodiesel) processors, livestock producers and the feed industry of the need for safety assessments prior to the use in animal feeds of by-products from the production of biofuels. **(viii)**
- The international emergency notification system for food (INFOSAN) should be expanded in collaboration with the OIE to consider linkages between food and feed emergencies and to incorporate appropriate changes to include feed emergency notifications. **(xi)**
- Emergency response systems for feed and food should be developed at the national and regional levels to contribute to food safety. FAO and WHO should assist in the development and application of such systems. **(xi)**
- Training for regulators, inspectors, all sectors of the feed manufacturing and distribution chain, the livestock industry, farmers and other stakeholders relating to the production of safe feed should be carried out where possible using existing training materials, i.e. guidelines and manuals. FAO, WHO and other organizations should assist in the development of training methods. **(xii)**
- FAO and WHO should convene regular expert meetings and other fora to continue monitoring the situation, update information on the impact of feed on food safety, foster dialogue among partners and identify areas needing attention. **(xiii)**

Relevant literature

FAO/WHO. 2004. Code of practice on good animal feeding, (CAC/RCP 54-2004). Rome. (www.codexalimentarius.net/download/standards/10080/CXC_054_2004e.pdf).

FAO/WHO. 2001. Code of practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001). Rome. (available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety*. Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf).

The numbering **(i), (ii)…..(xi)..(xiii)** *that appears in nearly all sections of the document refers to the recommendations in the report on Animal Feed Impact on Food Safety.*

DOCUMENT DE TRAVAIL

Proposition concernant le champ d'application et le cadre de référence des travaux futurs sur l'alimentation animale

Lors de la réunion d'experts mixte FAO/OMS sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires (Rome, Italie, octobre 2007), il a été souligné que la méthodologie actuelle appliquée par le Codex pour évaluer les risques liés à la sécurité sanitaire des denrées alimentaires ne permettait pas d'aborder les problèmes de sécurité sanitaire des aliments pour animaux liés à la sécurité sanitaire des denrées alimentaires. Pour les producteurs du monde entier, la réalité est telle que les différentes méthodologies d'évaluation des risques appliquées par les membres du Codex peuvent engendrer des résultats largement différents et donc des décisions contradictoires pour le contrôle des risques, au détriment du commerce international et de la sécurité des consommateurs.

Sur la base des délibérations et des recommandations des experts à Rome, du rapport publié par la FAO en février 2008 et, en conséquence, du consensus atteint lors de la 31e session de la CAC à Genève (Suisse), un groupe intergouvernemental *spécial* sur l'alimentation animale (GSAA) devrait être constitué en vue de :

- promouvoir l'application du Code d'usages du Codex pour une bonne alimentation animale en vue de réduire les risques au minimum ;
- œuvrer à l'harmonisation des outils de contrôle des risques en vue de garantir des denrées alimentaires sûres et un commerce équitable.

Le GSAA devrait avoir pour mandat de :

1. élaborer des principes généraux et des directives pour l'évaluation des risques pour les ingrédients des produits d'alimentation animale ou pour les catégories d'ingrédients. Ces principes et directives devraient être développés sur la base des principes du Codex pour l'analyse des risques[7] et en tenant compte des textes applicables du Codex tels que les principes et directives régissant la conduite de l'évaluation des risques microbiologiques[8]; les principes d'analyse des risques appliqués par le Comité du Codex sur les résidus de pesticides, les principes d'analyse des risques observés par le Comité du Codex sur les résidus des médicaments vétérinaires dans les aliments, et les principes d'analyse des risques appliqués par le Comité du Codex sur les additifs alimentaires et par le Comité du Codex sur les contaminants dans les aliments[9] ; **(ii)**

2. élaborer des normes pour les aliments pour animaux et leurs ingrédients en termes de sécurité alimentaire. À cet égard, le groupe de travail devrait tenir compte, d'une part, de la liste, dressée par la réunion d'experts FAO/OMS sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires, par ordre de priorité, des risques liés aux aliments pour animaux et à leurs ingrédients susceptibles de présenter un danger pour la sécurité sanitaire des aliments à l'échelle internationale[10] et, d'autre part, des besoins spécifiques des pays en vue d'une évaluation plus approfondie de risques spécifiques par des comités internationaux d'experts scientifiques ; **(iii)**

3. a) réviser les codes actuels du Codex[11] relatifs aux situations d'urgence, qui englobent également les aliments pour animaux, afin d'y inclure des dispositions spécifiques sur les urgences liées à l'alimentation animale en rapport avec la sécurité sanitaire des denrées alimentaires. À cet égard, le groupe de travail devrait envisager si les autorités et organes de réglementation internationaux actuels (tels que le JECFA) sont suffisants pour la prise en charge de l'évaluation des risques en matière de sécurité sanitaire des aliments pour animaux, ou si de nouvelles compétences d'évaluation des risques s'imposent. En outre, le groupe de travail devrait établir une

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[7] FAO/OMS, 2006. *Commission du Codex Alimentarius, Manuel de procédure*, dix-septième édition. Programme mixte FAO/OMS sur les normes alimentaires, Rome (disponible à l'adresse ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17f.pdf).

[8] FAO/OMS, 2001. *Principes et directives régissant la conduite de l'évaluation des risques microbiologiques.* Alimentation et nutrition/Codex Alimentarius (CAC/GL 30) – Programme mixte FAO/OMS sur les normes alimentaires, Rome (disponible à l'adresse http://www.codexalimentarius.net/download/standards/357/CXG_030f.pdf).

[9] FAO/OMS. 2007. *Principes du Codex pour l'analyse des risques* (manuel de procédure de la Commission du Codex Alimentarius), dix-septième édition. Programme mixte FAO/OMS sur les normes alimentaires, Rome, (disponible à l'adresse ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17f.pdf).

[10] FAO/OMS, 2007. Rapport de la *réunion d'experts sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires*, Rome (disponible à l'adresse http://www.fao.org/ag/againfo/resources/documents/A1507F.pdf).

[11] *Principes et directives pour l'échange d'informations dans les situations d'urgence en matière de sécurité sanitaire des aliments* (CAC/GL 19-1995) (disponible à l'adresse http://www.codexalimentarius.net/download/standards/36/CXG_019f.pdf *Directives concernant les échanges d'informations entre pays sur les rejets de denrées alimentaires à l'importation* (CAC/GL 25-1997) (disponible à l'adresse www.codexalimentarius.net/download/standards/353/CXG_025f.pdf). *Principes applicables à la traçabilité/au traçage des produits en tant qu'outil d'un système d'inspection et de certification des denrées alimentaires* (CAC/GL 60-2006) (disponible à l'adresse www.codexalimentarius.net/download/standards/10603/CXG_060f.pdf).

liste de toutes les options disponibles pour des outils de contrôle des risques et élaborer des propositions de mesures de contrôle proportionnelles aux risques ; **(x)**

b) élaborer des critères d'identification des situations d'urgence. De tels critères sont essentiels dans des systèmes d'échange d'informations sur les situations d'urgence en matière de sécurité sanitaire des produits pour animaux (par exemple, INFOSAN) *(cf. section « Initiatives de la FAO » à la page 3, troisième point).*

c) préparer une proposition pour un système de traçabilité/traçage des produits en vue de l'identification de la source des risques *(cf. section « Initiatives de la FAO » à page 3, troisième point)* ;

4. réviser le Code d'usages actuel du Codex en matière de mesures prises à la source pour réduire la contamination des denrées alimentaires par des substances chimiques[12], qui englobe également les aliments pour animaux, afin d'y inclure des dispositions spécifiques relatives à la sécurité sanitaire des aliments pour animaux ; **(iv)**

5. tenir pleinement compte des travaux effectués par les comités du Codex pertinents et par d'autres organes internationaux pertinents, dont la FAO, l'OMS, l'OIE et la CIPV, et collabore à ces travaux.

Sur la base des recommandations, les aspects suivants devraient être analysés dans les limites des compétences des comités spécifiques :

Le **CCMAS (vi)** devrait mettre au point des méthodes économiques et précises de détection et de quantification des dioxines, des oxydes de dyphénylène et des PCB de type dioxine dans les aliments pour animaux et leurs ingrédients.

Le **CCMAS (vii)** devrait élaborer des méthodes rapides et semi-quantitatives pour le dépistage de l'aflatoxine B1 tant dans les aliments pour animaux que dans leurs ingrédients. Les méthodes devraient être assez simples pour être utilisées par le personnel non technique et peu onéreuses pour en promouvoir l'usage.

Les recherches des experts FAO et OMS devraient être axées sur :

1. la réalisation de recherches sur les taux de transfert et d'accumulation de dioxines, d'oxydes de dyphénylène et de PCB de type dioxine, depuis les aliments pour animaux vers les tissus comestibles des produits d'origine animale, et poursuite de l'application de mesures de contrôle ; **(v)**

2. la réalisation de recherches complémentaires sur le devenir et la concentration résiduelle de l'aflatoxine B1, et des antibiotiques utilisés pour contrôler la croissance microbienne indésirée durant le processus de fermentation des biocarburants. Il faudrait également mener des recherches afin d'évaluer le risque de niveaux résiduels de méthanol dans le glycérol résultant de la production de biodiesel lorsqu'il est utilisé comme ingrédient des aliments pour animaux, notamment dans la production laitière. **(ix)**

Initiatives de la FAO (formation, renforcement des capacités, etc.)

- Promouvoir l'application du Code d'usages du Codex pour une bonne alimentation animale en vue de réduire les risques au minimum. **(i)**

- Améliorer la communication afin de sensibiliser les transformateurs de biocarburants (éthanol et biodiesel, par exemple), les éleveurs et l'industrie de l'alimentation animale sur la nécessité de procéder à des évaluations de sécurité sanitaire avant d'utiliser des sous-produits issus de la production de biocarburants dans les aliments destinés aux animaux. **(viii)**

- En collaboration avec l'OIE, élargir le Réseau international des autorités de sécurité sanitaire des aliments (INFOSAN) afin d'étudier les liens entre les situations d'urgence en matière de sécurité sanitaire de l'alimentation humaine et animale, et d'intégrer les changements appropriés, y compris les déclarations d'urgence relatives aux aliments pour animaux. **(xi)**

- Élaborer des plans d'intervention à mettre en œuvre aux niveaux national et régional en cas d'urgence lorsque des aliments et des aliments pour animaux présentent des risques pour la sécurité sanitaire. La FAO et l'OMS devraient concourir au développement et à l'application de ces plans. **(xi)**

- Formation, partout où cela est possible, de responsables, d'inspecteurs, de tous les secteurs de l'industrie de l'alimentation animale et de la chaîne de distribution, de l'industrie des productions animales, des éleveurs et autres parties concernées dans le domaine de la production d'aliments sains pour animaux à l'aide du matériel pédagogique disponible, tel que principes directeurs et manuels. La FAO, l'OMS et d'autres organisations devraient contribuer à l'élaboration des méthodes de formation. **(xii)**

[12] FAO/OMS. 2001. *Code d'usages en matière de mesures prises à la source pour réduire la contamination des denrées alimentaires par des substances chimiques* (CAC/RCP 49-2001), Rome (disponible à l'adresse www.codexalimentarius.net/download/standards/373/CXP_049f.pdf).

- Organisation périodique, par la FAO et l'OMS, de réunions d'experts et d'autres rencontres afin d'assurer le suivi de la situation, d'actualiser l'information sur l'impact des aliments pour animaux sur la sécurité sanitaire des aliments, de promouvoir le dialogue entre partenaires et d'identifier les domaines auxquels il faut accorder une attention particulière. **(xiii)**

Références utiles

FAO/OMS, 2004. Code d'usages pour une bonne alimentation animale (CAC/RCP 54-2004), Rome (www.codexalimentarius.net/download/standards/10080/CXC_054_2004f.pdf).

FAO/OMS, 2001. Code d'usages en matière de mesures prises à la source pour réduire la contamination des denrées alimentaires par des substances chimiques (CAC/RCP 49-2001), Rome (disponible à l'adresse www.codexalimentarius.net/download/standards/373/CXP_049f.pdf).

FAO/OMS, 2007. Rapport de la *réunion d'experts sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires*, Rome (disponible à l'adresse http://www.fao.org/ag/againfo/resources/documents/A1507F.pdf

Les chiffres **(i), (ii).....(xi)..(xiii)** *figurant dans pratiquement toutes les sections du document font référence aux recommandations formulées dans le rapport sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires.*

DOCUMENTO DE TRABAJO

Propuesta del alcance y mandato de los trabajos futuros en alimentación animal

En la reunión de expertos de FAO/WHO Sobre el impacto de la alimentación animal en la seguridad y sanidad de los alimentos (Roma, Italia, octubre de 2007) se hizo notar que la actual metodología del Codex para la evaluación de riesgos en piensos y su repercusión en la sanidad de alimentos no es adecuada para abordar los problemas sanitarios derivados de la alimentación animal. Los productores alrededor del mundo hacen frente a la realidad de que los países miembro de Codex Alimentarius aplican diversas metodologías para el análisis de riesgos en piensos, lo que trae como consecuencia resultados altamente diversos y conlleva a una toma de decisiones contradictorias para el manejo de riesgo, afectando el comercio internacional sin ninguna ventaja para la seguridad del consumidor.

De acuerdo con las deliberaciones y las recomendaciones hechas por el grupo de expertos en Roma, el informe publicado por FAO en febrero de 2008, y al acuerdo alcanzado durante la 31ª Reunión de la Comisión de Codex Alimentarius (CAC) en Ginebra, Suiza, se debe establecer un grupo de trabajo intergubernamental en alimentación animal (TFAF) con la finalidad de:

- Promover el uso del Código de Prácticas sobre Buena Alimentación Animal del Codex Alimentarius con la finalidad de reducir al mínimo riesgos derivados de los piensos.
- Trabaje en la armonización de las herramientas para el manejo de riesgos para asegurar alimentos seguros y prácticas comerciales justas.

El mandato para el TFAF debe incluir los siguientes puntos:

1. Desarrollo de los principios generales y las guías para la evaluación de riesgos de los ingredientes utilizados en la alimentación animal o de categorías de ingredientes. Los principios y las guías se deben desarrollar en base de los principios del Codex para el análisis de riesgo[13] , así como tomar en cuenta los textos relevantes del Codex, por ejemplo: Principios y Directrices para la Aplicación de la Evaluación de Riesgos Microbiológicos[14]; Principios para la Gestión de Riesgos Microbiológicos[15]; Principios y Directrices para la Aplicación de la Evaluación de Riesgos en los residuos de plaguicidas; principios de análisis de riesgo sobre los residuos de medicamentos veterinarios; y los principios de análisis de riesgo sobre aditivos alimenticios y el comité del Codex sobre contaminantes en alimentos[16].**(ii)**
2. Desarrollo de estándares para piensos y sus ingredientes en relación con la seguridad de los alimentos. Al realizar esto, el grupo de trabajo deberá tomar en consideración la lista de peligros priorizados por su relevancia internacional, tal y como se recomendó en la reunión de expertos de FAO/WHO Sobre el impacto de la alimentación animal en la seguridad y sanidad de los alimentos (Roma, Italia, octubre de 2007)[17], así como las necesidades específicas de los países para una posterior evaluación de riesgos específicos por el comité de expertos. **(iii)**
3. a) Revisar los códigos existentes[18] en el marco del Codex referentes al manejo de situaciones de emergencia, que también abarcan la alimentación animal, para incluir provisiones específicas en las emergencias de de piensos relacionadas con la seguridad de alimentos. El grupo de trabajo deberá considerar si las autoridades reguladoras y los organismos internacionales actuales (tales como JECFA) son suficientes llevar a cabo el análisis de riesgo de la sanidad de la alimentación animal, o si es necesaria la creación de un nuevo organismo. Además el grupo de

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[13]FAO/WHO, 2006. *Manual de Procedimientos de la Comisión del Codex Alimentarius.* 17ª. Edición. Rome.(Disponible en ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17s.pdf).

[14] FAO/WHO, 2001. *Principios y Directrices para la Aplicación de la Evaluación de Riesgos Microbiológicos* (Disponible en: http://www.codexalimentarius.net/download/standards/357/CXG_030s.pdf)

[15] FAO/WHO, 2001. *Principios para la Gestión de Riesgos Microbiológicos.* Food and nutrition/Codex Alimentarius – Joint FAO/WHO Food Standards Programme, Rome. (Disponible en http://www.codexalimentarius.net/download/standards/357/CXG_030s.pdf)

[16] FAO/WHO. 2007. *Codex Alimentarius principles for risk analysis,* (Manual de procedimiento – Comisión del Codex Alimentarius), Decimoséptima edición. Programma Conjunto FAO/OMS sobre Normas Alimentarias. (Disponible en ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17e.pdf)

[17] FAO/WHO, 2007. *Informe de la reunión de expertos sobre impacto del pienso en seguridad del alimento*. Roma. (Disponible en ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf)

[18] *Principios y directrices para el intercambio de información en situaciones de emergencia relacionadas con la inocuidad de los alimentos* (CAC/GL 19-1995) (Disponible en http://www.codexalimentarius.net/download/standards/36/CXG_019s.pdf). *Directrices para el intercambio de información entre países sobre casos de rechazo de alimentos importados* (CAC/GL 25-1997) (Disponible en www.codexalimentarius.net/download/standards/353/CXG_025s.pdf). *Principios para la rastreabilidad/rasterode productos como herramienta en el contexto de la inspevvión y certificación de alimentos* (CAC/GL 60-2006) (Disponible en www.codexalimentarius.net/download/standards/10603/CXG_060s.pdf).

trabajo debe enumerar todas las opciones disponibles para la gestión de riesgos y hacer propuestas para la aplicación de la gestión de riesgo. **(x)**

b) Establecer los criterios para la identificación de las situaciones de la emergencia. Tales criterios son esenciales en los sistemas de intercambio de información sobre situaciones de emergencia (e.g. INFOSAN) (véase la página 3 "Iniciativas de FAO" – tercera viñeta).

c) Preparar una propuesta para un sistema de trazabilidad/rastreabilidad de producto para la identificación de la fuente de los peligros (véase la página 3 "Iniciativa de FAO" – tercera viñeta)

4. Revisar el Código de Prácticas sobre Medidas Aplicables en el Origen para Reducir la Contaminación de los Alimentos por Productos Químicos del Codex[19], para incluir las provisiones específicas relacionadas con la seguridad de la alimentación animal y su repercusión en la sanidad de los alimentos. **(iv)**
5. El grupo de trabajo debe considerar por completo, la interacción con otros comités del Codex, así como otros organismos internacionales dentro de FAO, WHO, OIE e IPPC.

Considerando las recomendaciones del grupo de expertos, los siguientes puntos se deben analizar bajo alcance de los comités específicos:

CCMAS (vi) debe desarrollar métodos analíticos baratos y exactos para la detección y la cuantificación de dioxinas, dibenzofuranos y derivados, como PCBs, para la determinación en piensos e ingredientes de los mismos.

CCMAS (vii) debe desarrollar los métodos de detección rápidos y semicuantitativos para la detección de aflatoxina B1 en piensos e ingredientes de los mismos. Los métodos deben ser bastante simples para uso de personal no técnico, así como baratos para incentivar su uso.

La investigación por los expertos de FAO/WHO se debe enfocar en:

1. Índices de transferencia y acumulación de dioxinas, dibenzofuranos, y derivados, como PCBs, de la alimentación al tejido comestible en productos animales, y continuar con la gestión de medidas. **(v)**
2. Determinar la concentración residual de la aflatoxina B1 y de cualquier antibiótico usado para controlar crecimiento microbiano indeseado durante el proceso de fermentación de los biocombustibles. Es necesaria también la investigación para evaluar el riesgo de niveles residuales del metanol en glicerol derivado de la producción del biodiesel cuando se utiliza como ingrediente de la alimentación animal, particularmente en la producción de lácteos. **(ix)**

Iniciativas de FAO (entrenamiento, desarrollo de infraestructura y capacidad, etc.)

- Promover el uso del código de prácticas en la buena alimentación animal para reducir al mínimo los riesgos. **(i)**
- Mejorar la comunicación sobre la necesidad de la evaluación de la sanidad previo a la producción de alimentos para animales derivados de la producción de biocombustibles, hacia los productores de biocombustibles (e.g. procesadores del etanol y del biodiesel), productores del ganado y la industria de la alimentación animal. **(viii)**
- El sistema internacional de la notificación de la emergencia para alimentos (INFOSAN) debe de ampliarse en colaboración con la OIE para considerar las interacciones existentes entre los piensos y los alimentos en las emergencias, de modo tal que se realicen los cambios y adecuaciones necesarias para que el sistema considere las emergencia de los piensos. **(XI)**
- Los sistemas de respuesta a emergencias para piensos y alimentos deben ser desarrollados a nivel nacional y regional para contribuir a la seguridad de los alimentos. FAO y WHO deben de brindar asistencia en el desarrollo y uso de tales sistemas. **(XI)**
- Se debe realizar el entrenamiento para los reguladores, los inspectores, todos los sectores de la cadena productiva y de distribución de alimentos para animales, la industria del ganado, los granjeros y otros actores involucrados en la producción de alimentos para animales seguros usando, en lo posible, los materiales existentes como guías y manuales. FAO, WHO y otras organizaciones deben apoyar el desarrollo de los métodos de entrenamiento. **(XII)**
- FAO y WHO deben convocar a reuniones de expertos regulares, así como a otros foros para continuar supervisando la situación, poner al día la información del impacto de la alimentación animal en la seguridad de los alimentos, fomentar el diálogo entre socios y para identificar las áreas que necesitan atención. **(xiii)**

[19] FAO/WHO. 2001. *Códicade prácticassobre medidas aplicables el origin para reducer la contaminación de los alimentos con sustancias químicas* (CAC/RCP 49-2001). Rome. (Disponible en www.codexalimentarius.net/download/standards/373/CXP_049s.pdf).

Literatura relevante:

FAO/WHO. 2004. Código de la práctica en la buena alimentación animal, (CAC/RCP 54-2004).Roma. (Disponible en (www.codexalimentarius.net/download/standards/10080/CXC_054_2004s.pdf)

FAO/WHO. 2001. El código de la práctica para la fuente dirigió medidas de reducir la contaminación del alimento con los productos químicos (CAC/RCP 49-2001). Roma. (disponible en www.codexalimentarius.net/download/standards/373/CXP_049s.pdf).

FAO/WHO, 2007. Informe de la reunión de expertos sobre impacto del pienso en seguridad del alimento. Roma. (Disponible en ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf)

El número romano que aparece en casi todas las secciones del documento refiere a las recomendaciones en el informe sobre impacto del pienso en seguridad del alimento.

COMMENTS

ARGENTINA

Argentina agradece la posibilidad de realizar los siguientes comentarios.

COMENTARIOS GENERALES

Argentina desea destacar que, aún considerando la importancia del reinicio de los trabajos de este grupo, resulta prioritario todavía ampliar la aplicación en los países del Código de Prácticas sobre Buenas Alimentación Animal (CAC/RCP 5 – 2004).

Por otro lado, y poniendo en consideración la futura capacidad de trabajo de este Grupo Intergubernamental Especial, Argentina interpreta que sería de gran utilidad priorizar en primera instancia el trabajo vinculado a este Código, la generación de anexos o la revisión de otros códigos existentes, antes de iniciar nuevos trabajos más específicos.

Asimismo, Argentina desea manifestar el apoyo a todas aquellas iniciativas de la FAO vinculadas con el fortalecimiento del trabajo en la temática y la asistencia en cooperación brindada.

COMENTARIOS ESPECÍFICOS

Argentina considera importante recordar que los trabajos de este Grupo Intergubernamental Especial deberá mantenerse en el marco del uso de los piensos, tal y como son definidos en el Código de Buena Alimentación Animal.

i - Uso del Código de Prácticas sobre Buena Alimentación Animal del Codex con la finalidad de reducir al mínimo riesgos derivados de los piensos.

Argentina ha venido trabajando en la implementación progresiva del Código, lo que ha permitido también que algunas empresas elaboradoras de alimentos para animales desarrollen sus propios sistemas de buenas prácticas de fabricación armonizados con los principios de inocuidad de este Código.

Argentina considera primordial contar con más tiempo para ampliar la aplicación del Código. Asimismo, sugiere que los futuros trabajos aborden el desarrollo de Anexos que involucren procedimientos de aplicación práctica u otras cuestiones asociadas, tal que se facilite la lectura unificada de toda la normativa relacionada. En este sentido, Argentina desea remarcar la importancia de tener en consideración las diversas modalidades y sistemas productivos de las distintas regiones del mundo.

Al respecto, se considera oportuno que la FAO, y otras organizaciones internacionales de referencia en la materia, promuevan y apoyen la aplicación práctica del Código a través de entrenamiento para los reguladores, los inspectores y todos los sectores de la cadena productiva y de distribución de alimentos para animales.

ii- Trabajar en la armonización de las herramientas para el manejo de riesgos para asegurar alimentos seguros y prácticas comerciales justas.

- Resulta primordial garantizar que las exigencias que deriven de las normativas emergentes a nivel internacional sean proporcionales al riesgo. Asimismo, deberá tenerse en consideración las características propias de los sectores productivos involucrados de manera que las especificaciones normativas que se establezcan no deriven en requisitos excesivos o injustificados de difícil cumplimiento, en particular para los países en desarrollo.
- Argentina coincide en la necesidad de desarrollar principios generales y guías de análisis de riesgos aplicados por este Grupo Intergubernamental Especial. En esta tarea deben contemplarse todos los textos relevantes del Codex, entre ellos los Principios de Análisis de Riesgos para el Codex, los Principios y Directrices para la aplicación de la evaluación de riesgos microbiológicos, los Principios para la gestión de riesgos microbiológicos, para residuos de plaguicidas, residuos de medicamentos veterinarios, aditivos alimenticios y sobre contaminantes, tal de obtener un documento de aplicación práctica para los gobiernos y/o la industria. Tanto la evaluación como la gestión de riesgos debe considerar específicamente cuestiones vinculadas a los piensos, tal y como se define en el ámbito del Codex.
- Argentina considera que es válida la necesidad de desarrollar estándares para “piensos” y sus ingredientes, siempre que este específicamente relacionado con los riesgos priorizados en las recomendaciones del Grupo de Expertos de FAO/WHO, y cuando no existan otras normas que los contemplen. Al respecto, es importante manifestar la necesidad de trabajar de manera integrada con la OIE, y de tener en cuenta las características particulares de las diferentes regiones a nivel mundial.
- Con relación a la revisión de códigos existentes en el marco del Codex o la realización de evaluaciones de riesgos, se considera que los órganos auxiliares de la Comisión del Codex Alimentarius actualmente existentes son suficientes, entendiéndose en esto a los Comités técnicos a los cuales solicitar comentarios (CCRVDF, CCPR, CCMAS, etc.) o los Grupos de Expertos (JECFA, JEMRA y JMPR). Sin embargo, Argentina considera que quizás se debería revisar los alcances de las actuaciones de grupos de expertos, de manera de contemplar el análisis de

riesgo según las necesidades de la elaboración de los "piensos". Asimismo, resulta importante contar con la más amplia participación de actores y con un trabajo integrado con otros organismos internacionales (OIE/ IPPC) en las revisiones o nuevos trabajos que se inicien.

- Argentina coincide en la necesidad de contemplar y establecer criterios para la identificación de las situaciones de emergencia, esenciales en el intercambio de información sobre situaciones de emergencia, para incluirlas en INFOSAN, teniendo en consideración aspectos de la trazabilidad enunciados en la Guía OIE sobre el tema (un paso adelante – un paso atrás).

  Al respecto resulta fundamental tener en consideración la norma elaborada en el marco del CCFICS sobre los Principios y Directrices para el Intercambio de Información en Situaciones de Emergencia relacionadas con la Inocuidad de Alimentos (CAC/GL 19 – 1995), y recordar que en el marco del Acuerdo sobre Medidas Sanitarias y Fitosanitarias de la OMC (SPS-WTO) existe un procedimiento para la notificación de las medidas de emergencias adoptadas por los países en el marco de la protección de la salud.

- Argentina también apoya la necesidad de desarrollo de métodos sensibles, específicos y económicos aplicables a nivel mundial, teniendo en consideración para priorizar estos trabajos las recomendaciones emanadas de los grupos de expertos en base a una evaluación de riesgos que contemple las particularidades de cada región.

- Argentina entiende que la participación de FAO resulta de vital importancia a los efectos de complementar las acciones de capacitación, asistencia técnica y promoción de la aplicación del Código de Prácticas sobre Buena Alimentación Animal, al igual que de otras normativas emergentes, promoviendo la interacción entre los ámbitos públicos y privados.

- Finalmente, Argentina desea poner en consideración la importancia de evaluar el costo – beneficio de las medidas implementadas, desde una perspectiva de "proporcionalidad" entre la medida y el riesgo real para la salud del consumidor. Asimismo, y con especial atención en los países en desarrollo, resulta importante considerar los impactos económicos que devienen de la implementación de nuevas normativas en la materia.

ARGENTINA (English version)

Argentina thanks the opportunity of making the following comments.

GENERAL COMMENTS

Argentina wishes to emphasize that, even considering the importance of the reestablishment of the Task Force on Animal Feeding, it is still a priority to extend the application in the countries of the Code of Good Practices on Feeding Animal (CAC/RCP 5 - 2004).

On the other hand, and considering the possible capacity of the *Ad hoc* Intergovernmental Task Force, Argentina believes that it would be very useful to prioritize in first instance the work linked with this Code, the generation of annexes or even the review of other existing codes, prior to initiating new more specific works.

Also, Argentina wishes to show the support to all those FAO-coordinated initiatives that are being done in order to fortify the work made, as well as the assistance offered.

SPECIFIC COMMENTS

Argentina considers important to remember that the terms of reference of this *Ad hoc* Intergovernmental Task Force will have to stay within the framework of the use of the feed, as defined by the Code of Good Feeding Animal.

i - Use of the Code of Practices on Good Feeding Animal of the Codex with the purpose of minimizing the risks derived from feed

Argentina has been doing a progressive implementation of the Code, which has also allowed that some feed production industries develop their own systems of good manufacture practices, harmonized with the safety principles of this Code.

Argentina considers fundamental to have more time to extend the application of the Code. Also, suggests that any future work should approach the development of Annexes that involve procedures of practical application or other associated issues, in order to facilitate a common understanding of all related regulation. In this sense, Argentina wishes to remark the importance to consider the diverse modalities and productive systems from different regions of the world.

It is considered that FAO, along with other international organizations of reference matter, promote and support the practical application of the Code through training for the regulators, the inspectors and all the sectors of the productive and distribution chain of feed.

ii - Work in the harmonization of risk management tools to assure practical safe foods and commercial equity.

- It is fundamental to guarantee that the exigencies derived from emergency standards at international level are proportional to the risk associated. Also, the specific characteristics involved in productive sectors must be

considered so that the technical specifications settled do not present excessive or unjustified requirements difficult to fulfill, mainly for developing countries.

- Argentina agrees with the need to develop to general principles and guidelines for risk analysis applied by this *Ad hoc* Intergovernmental Task Force. This task should consider all relevant Codex Documents, such as the Principles for Risk Assessment of the Codex, the Principles and Directives for the application of the evaluation of microbiological risks, the Principles for the management of microbiological risks, pesticide and veterinary drug residues, food additives and contaminants, in order to obtain a document for the practical application by the governments and/or the industry. Risk analysis as well as risk management, should both consider feed concerns, as it is defined in the scope of the Codex.
- Argentina considers valid the need to develop feed and feed ingredient standards, whenever it is specifically related to the risks prioritized in the recommendations of the Group of Experts of FAO/WHO, and whenever there is a lack of other standards. On the matter, it is important to express the necessity to work in an integrated manner with the OIE, as well as to consider the specific characteristics from different regions of the world.
- In relation to the revision of existing codes within the framework of the Codex or the accomplishment of risks evaluations, it is considered that the existing auxiliary bodies of the Commission are sufficient, being understood within these the technical Committees (CCRVDF, CCPR, CCMAS, etc.) or the Groups of Experts (JECFA, JEMRA and JMPR). Nevertheless, Argentina considers that perhaps it would feasible to review the performance of such groups of experts, to contemplate the risk analysis according to the necessities of the elaboration of feed. Also, it is important to count on the amplest participation of involved parties and on a work integrated manner with other international organisms (OIE/IPPC) in the reviews or establishment of new works.
- Argentina agrees with the necessity to contemplate and to establish criteria for the identification of emergency situations, essential for the exchange of information on emergency situations, to include them in INFOSAN, considering traceability aspects stated in the OIE Guidelines on the subject (a step forward - a step back). On the matter it is fundamental to have in consideration the standard elaborated within the framework of the CCFICS on the Principles and Directives for the Exchange of information in Emergency Situations related to Food Safety (CAC/GL 19 - 1995), and to remember that within the framework in the Agreement on Sanitary and Phitosanitary Measures of WTO (SPS-WTO) there is a procedure for the notification of the emergency measures adopted by the countries in order to protect health.
- Argentina also supports the need of development of sensitive, specific and economic methods of analysis, applicable world-wide, having in consideration the recommendations emanated from the group of experts in order to prioritize these works, on the basis of risk evaluation that contemplates the singularities of each region.
- Argentina understands that the participation of FAO is of vital importance to the effects of complementing the training actions (capacity building), technical assistance and promotion of the application of the Code of Practices on Good Animal Feeding, as well as other emergent standards, promoting the interaction between the scopes public and private sectors.
- Finally, Argentina wishes to put in consideration the importance of evaluating the cost - benefit of the measures implemented, from a perspective of “proportionality” between the actual measure and the real risk for the health of the consumer. Also, and with special attention in the developing countries, it is important to consider the economic impacts that derived from the implementation of new standards or regulations.

AUSTRALIA

Australia wishes to apologise for its late submission of comments to the electronic working group however, as you are aware there has been some technical difficulty in receiving the correspondence regarding the document.

Australia agrees with Canada, the European Commission and Brazil that the CAC did not agree to establish a task force, rather it agreed to establish an electronic working group to prepare:

i) a proposal for the scope and terms of reference for future work on animal feeding, in doing so the working group should take into consideration the conclusions and recommendations of the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety; and

ii) a proposal as to suitable mechanisms for Codex to carry out this work, including, but not limited to, the establishment of an Ad Hoc Intergovernmental Task Force.

It is important that the role of the electronic working group be clarified in the working document.

Australia believes that countries still need time to implement the existing Codex Code of Practice on Good Animal Feeding and that efforts should be focused on supporting countries in doing this. It is possible that some of the work outlined in the proposed scope and terms of reference will support countries in implementing and complying with this Code and Australia supports any such work that will do this.

Australia supports the proposal to develop risk assessment guidance for hazards in animal feed if current Codex risk assessment and risk analysis documents are deemed inadequate in this area. However, Australia agrees with Canada and New Zealand that further guidance on traceability may not be needed as this has been covered through the adopted Principles which have been completed by CCFICS and the current Code.

Australia does not agree that a new task force is necessarily the best mechanism to progress any required work. In this matter Australia agrees with Canada, Norway and Brazil that if additional topics relating to animal feed warrant consideration Codex should first consider whether such work could be assigned to existing Codex subsidiary committees, thus avoiding the need for a task force, which would require the use of valuable Codex resources. For instance, The Codex Committee on Contaminants in Food (CCCF) is already amending the General Standard on Contaminants and Toxins in Foods to specifically include feeds and CCCF should be the Committee that reviews the Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals which it was responsible for developing. In addition, some of the work regarding emergency situations could best be accommodated by expanding the INFOSAN network. As stated by New Zealand, other mechanisms to undertake the work need to be explored as they are essential in providing the CAC with the information it needs to make a decision on this work.

BRAZIL

BRAZIL COMMENTS ON THE WORKING DOCUMENT – FIRST DRAFT PROPOSAL ON THE TERMS OF REFERENCE FOR FUTURE WORK ON ANIMAL FEEDING

Brazil welcomes the work done by the Coordination of the Electronic Working Group and would like to present the following remarks:

General comments:

- According to the decision of its 31st Session (paragraph 175 of Alinorm 08/31REP) the Commission agreed to postpone decision of possible new work on animal feeding until its 32nd Session.
- The mandate of the EWG was to prepare a proposal for the scope and terms of reference of future work on animal feeding and take into consideration the conclusions and recommendations of the FAO/WHO Expert Meeting on Animal Feeding Impact on Food Safety. The EWG should also prepare a proposal as to suitable mechanisms for Codex to carry out this work, including, but not limited to, the establishment of an Ad hoc Intergovernmental Task Force.
- In order to facilitate the discussion, and considering the conclusions and recommendations of the FAO/WHO Expert Meeting, Brazil understands that the EWG should focus on the identification of the issues mentioned on item 4.2 of the expert meeting report (Selection of undesirable substances and micro-organisms of concern), which have not been addressed by the existing Codex Committees.
- Brazil does not agree that at this moment there is enough support or justification for the establishment of an Ad hoc Task Force. The EWG should evaluate the issues of concern and then proceed on the identification of the possible mechanisms to address these issues.

Considering that it is of utmost importance the involvement of the member countries in these discussions, Brazil is of the opinion that it should be avoided the establishment of new task forces with mandate that overlaps the mandates of the existing Codex Committees. For example, the issues related to contaminants should be directed to the Committe on Contaminants in Food and so on.

Specific Comments:

Regarding the terms of reference for the TFAF, Brazil would like to point out the following:

1. The promotion of the application of the Codex Code of Practice on Good Animal Feeding is an activity of responsibility of the member countries;
2. The countries face different situations and Brazil would prefer work with the concept of equivalence, which is recognized by the SPS Agreement, rather than work on harmonization of risk management tools.

Regarding Code of Practices review:

It is reasonable to think about the gaps, but it is premature to propose the revision of Codex Codes of Practice recently approved. The countries need some time to implement these codes before thinking on revising them.

CANADA

Canada would like to thank Denmark and Mexico for preparing the Working Document and is pleased to offer the following comments for the Electronic Working Group's consideration:

GENERAL COMMENTS

- A number of food contaminants (e.g., dioxins, heavy metals) enter the food chain via feed and generally cannot be removed or destroyed during food processing. Thus, the establishment of feed controls is often the only mean to minimize the presence of these contaminants in food. We believe that the consideration of future work on animal feeding by Codex is important and should result in better addressing issues of food safety resulting from feed by preventing contamination events at source, prior to their introduction into the food chain.
- We note that the second paragraph in the Working Document indicates that an agreement was reached at the 31st CAC that a Task Force should be established to promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risk, and work on harmonization of risk management tools in order to ensure safe food and fair trade. Canada is of the view that this paragraph may lead to confusion as it seems to imply that a decision was taken at the 31st CAC to establish a Task Force, and thus, to presume the outcomes of the E-WG discussions and final recommendations at the 32nd CAC.

  We suggest that this paragraph be amended in the Working Document to carefully reflect the decisions of the 31st CAC with respect to future work on animal feeding. Specifically, the Commission agreed to postpone a decision on possible new work on animal feeding until its 32nd session (ALINORM 08/31/REP) and, in order to facilitate discussion and decision, it also agreed to establish an electronic working group, hosted by Denmark and co-chaired by Mexico, to prepare:

  (i) a proposal for the scope and terms of reference of future work on animal feeding. In doing so the working group should take into consideration the conclusions and recommendations of the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety; and

  (ii) a proposal as to suitable mechanisms for Codex to carry out this work.
- We support careful consideration of the recommendations of the FAO/WHO Expert Meeting to identify those that are within the mandate of Codex and further define those that would be considered a priority for further work on animal feeding within Codex.
- Canada notes that, in order to assist the 32nd CAC in its decision-making, the report of the E-WG should provide very clear rationale for its recommendations, whether it is the establishment of a Task Force or other suitable mechanisms to carry out future work on animal feeding.
- Should the E-WG identify the need for future work related to animal feeding, it will be important to determine whether such work can be undertaken by existing Codex subsidiary bodies or through a Task Force. In addition, any new work proposal will need to be examined within the context of the CAC's critical review process and competing work priorities, and taking into consideration the challenges faced by Member countries in their capacity to participate in existing or new Codex fora.
- When developing the proposal for the scope and terms of reference of future work on animal feeding, clear rationale and justification for new work should be provided and, most importantly, the limited lifespan of a Task Force should be taken into consideration so that any new work proposals/Terms of Reference are both feasible and likely to succeed.

SPECIFIC COMMENTS

On the Proposed Terms of Reference of a Task Force on Animal Feeding:

1. *Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients. The principles and guidelines should be developed […].*

Canada is of the view that the development of a "general principles and guidelines" document has merit. It should be a high level guidance in order to address the various types of hazards that can be present in feed. We note that several documents have been developed in the Codex system providing broad guidance for "science-based risk assessment". However, there are differences in the conduct of risk assessment for animal feeds as they impact food safety, i.e., there is a need to consider the potential transfer of residues from feed to edible animal products (meat, milk, eggs) that would justify the development of this guidance. Thus, we would call for careful consideration of existing texts, identification of gaps in relation to feed considerations and clear articulation of the scope of proposed work in this area.

2. *Develop standards for feed and feed ingredients with respect to food safety. In doing so the working group should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety and countries' specific needs for further evaluation on specific hazards by international scientific expert committees.*

We have serious reservations whether such work could be completed within the limited lifespan of a Task Force, particularly considering the different priorities of member countries as well as the emergence of new hazards. As indicated above, we believe it would be more appropriate and useful to consider the development of guidelines to

establish/assess contaminant limits in feed as they impact on food safety. Such guidelines would be of use to member countries in their respective assessments and to expert bodies that may be convened to conduct risk assessments on specific contaminants in feed/establish standards for feed and feed ingredients, as they impact food safety.

Furthermore, and should a decision be taken to reestablish a Task Force on Animal Feeding, one of its work assignments could be to review the list of prioritized hazards of international relevance established by the FAO/WHO Expert Meeting and identify/nominate substances/hazards that should be forwarded to the CCCF, whose Terms of Reference include feed aspects, for priority consideration and assessment. This process would provide a forum for all member countries to discuss and identify/agree on substances/hazards of highest concern. Once this list is completed, it could be referred to the CCCF via a recommendation to the CAC to give these substances a high priority, thus making use of existing Codex fora and processes (i.e., CCCF and JECFA). Should work relating to the impact of contaminants in animal feed on food safety be undertaken in the CCCF and related expert bodies (e.g., JECFA), it will be important to ensure that appropriate feed expertise is called upon within those fora.

We note that the Codex Committee on Food Contaminants, in its first session in 2007 (Alinorm 07/30/41), reviewed its Terms of Reference and reaffirmed its responsibilities to consider contaminants and naturally occurring toxicants in food as well as feed. With respect to the submission of substances for assessment, there are existing processes and criteria within CCCF to prioritize contaminants for consideration by JECFA. Specifically, a Circular Letter (CL) is issued by the Codex Secretariat to request comments and nominations for the priority list of contaminants and naturally occurring toxicants for evaluation by JECFA. This CL includes an Annex listing the type of information and criteria required for the nomination of new substances for the Priority List. In order to be placed on the JECFA priorities, a candidate contaminant in food or feed should meet the following criteria:

- Commodities potentially affected by this contaminant are in international trade and represent a significant portion of the diet;
- The occurrence of the compounds in commodities will have potential to cause public health impacts and/or trade problems;
- Commitment that a dossier (as complete as possible) will be made available for evaluation by JECFA.

Comments and new nominations are consequently considered by an in-session physical working group meeting which reviews and prioritizes substances for assessment. Therefore, Member countries may also use the existing procedure to propose that specific contaminants in feed be placed on the priority list, as per the criteria established by the CCCF.

3. *a) Review the existing Codex Codes regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety. In doing so the working group should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed. Furthermore the working group should list all available options on risk management tools and make proposals for risk-proportionate risk management measures.(x)*

We find that Item 3.a) of the proposed Terms of Reference includes three distinct ideas/proposals, specifically:

i) The review of existing Codex Codes regarding emergency situations in order to include specific provisions on feed emergencies related to food safety;

ii) Whether there is sufficient existing international capacity for the conduct of feed safety risk assessments;

iii) Listing all available options for risk management tools and making proposals for risk-proportionate risk management measures.

The proposal contained in item i) has merit, particularly when considering that several food emergency situations have occurred as a result of feed contamination events. We note that the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) has developed guidance on the exchange of information in food safety emergency situations or cases of rejection of imported food, specifically, the Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations (CAC/GL 19-1995, Rev.1-2004), and the Guidelines for the Exchange of Information Between Countries on Rejections of Imported Foods (CAC/GL 25-1997). We would support careful examination of those texts to identify any gaps, in relation to feed-related food safety issues. Should gaps be identified in existing texts, it may be considered to develop similar guidelines/principles for feed or revise/strengthen existing guidelines to recognize and include feed considerations. We suggest that the Commission may wish to consider either (1) forwarding a recommendation/request to CCFICS to consider the issue and recommend the best approach to carry out this work, or (2) recommending that such work be undertaken by a Task Force.

With respect to item ii), we suggest that it should be a separate recommendation from the E-WG to the CAC and FAO/WHO and not linked to a proposed Term of Reference since there are no specific deliverable related to this proposal that could be accomplished either by a Task Force or in an existing Committee.

As for item iii), we have serious reservations whether it would be feasible or appropriate for a Task Force with a limited lifespan to consider and list all options for risk management tools. Risk management measures will vary depending on several factors, including the specific risk under evaluation, the specific situation of the member country managing the risk, etc.

> *b) Establish criteria for the identification of emergency situations. Such criteria is essential in systems by which to exchange information on feed safety emergency situations (e.g. INFOSAN) (see page 3 "FAO iniciative" – third bullet).*

Canada is of the view that this proposal overlaps/complements the recommendation in bullet 3 about INFOSAN under "FAO initiative (training, capacity building, etc.)" and should be consolidated with the proposed recommendations to the FAO/WHO.

> *c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards (see page 3 "FAO iniciative" – third bullet),*

The CCFICS has developed Principles for Traceability / Product Tracing as a Tool Within a Food Inspection and Certification System (CAC/GL 610-2006). At its 16th Session in November 2007, the CCFICS established an electronic working group to consider whether further guidance was needed in the area of Traceability/Product Tracing (T/PT). The working group has recently completed its work and concluded that it could not identify conclusively that there is a need for further guidance at this time and recommended referring further discussion on the need for additional guidance on T/PT to Regional Coordinating Committees. This recommendation will be discussed at the upcoming session of the CCFICS in November 2008; thus, we are of the view that it would be preliminary to recommend the development of feed-related T/PT guidance, and suggest that it would be timely and appropriate to refer discussion on the need for feed-related T/PT, as an element of the discussion that may be held in Regional Coordinating Committees, should that be the recommendation at the upcoming CCFICS.

4. *Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed, in order to include specific provisions related to feed safety.*

Canada recalls that this Code was developed by the Codex Committee on Food Additives and Contaminants and thus, we suggest that a recommendation should be made to the CCCF to review the document and determine the need for its revision to further develop its feed-related aspects. Should such a revision be deemed useful, it could be undertaken by the CCCF or the development of additional material specific to feed considerations as they impact food safety could be mandated to a Task Force.

5. *The working group should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.*

Canada supports this proposal.

With respect to the recommendations made in the Working Document:

Recommendation to CCMAS on the development of methods of analysis:

The recommendations relating to CCMAS in the Working Document are beyond the mandate of this Committee. The CCMAS can endorse methods relating to specific standards and suggested by the relevant Codex Committees/Task Forces, and can recommend that methods developed by appropriate bodies (e.g., ISO, AOAC) be adopted as reference methods for Codex standards; however, CCMAS is not mandated to develop methods of analysis.

Research by experts from FAO and WHO:

We are uncertain whether the role of FAO and WHO is to conduct research activities in the areas highlighted in the Working Document. These recommendations should be referred back to the FAO & WHO for further clarification as to whether they fall within the scope of activities of these organizations.

FAO initiatives (training, capacity building, etc.):

- Bullet 1: While FAO/WHO capacity building activities may assist in the application of the Codex Code of Practice on Good Animal Feeding, we suggest that it is primarily the role of member countries to promote the application of the Code within their jurisdictions;
- Bullet 2: As above, it is primarily the role of member countries to raise awareness among its industry as to the need for safety assessments prior to the use of food or industrial by-products in animal feed;
- Bullets 3 to 6: we support these recommendations but would note that the role of national governments should also be emphasized in these activities.

FRANCE

Proposition concernant le champ d'application et le cadre de référence des travaux futurs sur l'alimentation animale

Lors de la réunion d'experts mixte FAO/OMS sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires (Rome, Italie, octobre 2007), il a été souligné que la méthodologie actuelle appliquée par le Codex pour évaluer les risques liés à la sécurité sanitaire des denrées alimentaires ne permettait pas d'aborder les problèmes de sécurité sanitaire des aliments pour animaux liés à la sécurité sanitaire des denrées alimentaires. Pour les producteurs du monde entier, la réalité est telle que les différentes méthodologies d'évaluation des risques appliquées par les membres du Codex peuvent engendrer des résultats largement différents et donc des décisions contradictoires pour le contrôle des risques, au détriment du commerce international et de la sécurité des consommateurs.

Sur la base des délibérations et des recommandations des experts à Rome, du rapport publié par la FAO en février 2008 et, en conséquence, du consensus atteint lors de la 31e session de la CAC à Genève (Suisse), un groupe intergouvernemental *spécial* sur l'alimentation animale (GSAA) devrait être constitué en vue de :

- promouvoir l'application du Code d'usages du Codex pour une bonne alimentation animale en vue de réduire les risques au minimum ;
- œuvrer à l'harmonisation des outils de contrôle des risques en vue de garantir des denrées alimentaires sûres et un commerce ~~équitable~~ loyal.

Le GSAA devrait avoir pour mandat de :

1. élaborer des principes généraux et des directives pour l'évaluation des risques pour les ingrédients des produits d'alimentation animale ou pour les catégories d'ingrédients. Ces principes et directives devraient être développés sur la base des principes du Codex pour l'analyse des risques et en tenant compte des textes applicables du Codex tels que les principes et directives régissant la conduite de l'évaluation des risques microbiologiques; les principes d'analyse des risques appliqués par le Comité du Codex sur les résidus de pesticides, les principes d'analyse des risques observés par le Comité du Codex sur les résidus des médicaments vétérinaires dans les aliments, et les principes d'analyse des risques appliqués par le Comité du Codex sur les additifs alimentaires et par le Comité du Codex sur les contaminants dans les aliments ; **(ii)**

2. élaborer une liste prioritaire des dangers associés aux ~~des normes pour les~~ aliments pour animaux et leurs ingrédients, en particulier les matières premières les plus échangées au niveau international, en termes de sécurité alimentaire. Ces dangers pourraient faire l'objet de standards le cas échéant. À cet égard, le groupe de travail devrait tenir compte, d'une part, de la liste, dressée par la réunion d'experts FAO/OMS sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires, par ordre de priorité, des risques liés aux aliments pour animaux et à leurs ingrédients susceptibles de présenter un danger pour la sécurité sanitaire des aliments à l'échelle internationale et, d'autre part, des besoins spécifiques des pays en vue d'une évaluation plus approfondie de risques spécifiques par des comités internationaux d'experts scientifiques ; **(iii)**

3. a) réviser les codes actuels du Codex relatifs aux situations d'urgence, qui englobent également les aliments pour animaux, afin d'y inclure des dispositions spécifiques sur les urgences liées à l'alimentation animale en rapport avec la sécurité sanitaire des denrées alimentaires. [NDR : hors champ du groupe de travail]. ~~À cet égard, le group de travial devrait envisager si les autorités et organes de réglementation internationaux actuels (tels que le JECFA) sont suffisants pour la prise en charge de l´évaluation des resques en matière de sécurité sanitaire des alimentes pour animaux, ou se de nouvelles compétences d´évaluation des resques s´imposent.~~ En outre, le groupe de travail devrait établir une liste de toutes les options disponibles pour des outils de contrôle des risques et élaborer des propositions de mesures de contrôle proportionnelles aux risques ; **(x)**
   b) élaborer des critères d'identification des situations d'urgence. De tels critères sont essentiels dans des systèmes d'échange d'informations sur les situations d'urgence en matière de sécurité sanitaire des produits pour animaux (par exemple, INFOSAN) *(cf. section « Initiatives de la FAO » à la page 3, troisième point).*
   c) préparer une proposition pour un système de traçabilité/traçage des produits en vue de l'identification de la source des risques *(cf. section « Initiatives de la FAO » à page 3, troisième point)* ;

4. réviser le Code d'usages actuel du Codex en matière de mesures prises à la source pour réduire la contamination des denrées alimentaires par des substances chimiques, qui englobe également les aliments pour animaux, afin d'y inclure des dispositions spécifiques relatives à la sécurité sanitaire des aliments pour animaux ; **(iv)**

5. tenir pleinement compte des travaux effectués par les comités du Codex pertinents et par d'autres organes internationaux pertinents, dont la FAO, l'OMS, l'OIE et la CIPV, et collabore à ces travaux.

[NDR : hors champ du groupe de travail].

~~Sur la base des recommandations, les aspects suivants devraient être analysés dans les limites des compétences des comités spécifiques :~~

~~Le **CCMAS (vi)** devrait mettre au point des méthodes économiques et précises de détection et de quantification des dioxines, des oxydes de dyphénylène et des PCB de type dioxine dans les aliments pour animaux et leurs ingrédients.~~

~~Le **CCMAS (vii)** devrait élaborer des méthodes rapides et semi quantitatives pour le dépistage de l´aflatoxine B1 tant dans les aliments pour animaux que dans leurs ingrédients. Les méthodes devraint être assez simples pour être utilisées par le personnel non technique et peu onéeuses pour en promovoir l´usage.~~

- **Les recherches des experts FAO et OMS devraient être axées sur :les dangers définis comme prioritaires par le présent groupe de travail.**
- ~~La réalisation de reserches sur les taux de transfert et d´accumulation de dioxines, d´oxydes de dyphénylène et de PCB de type dioxine, depuis les aliments pour animaux vers les tissus comostibles des produits d´origine animale, et poursuite de l´application de mesures de contrôle ; **(v)**~~
- ~~la réalisation de recherches complémentaires sur le devenir et la concentration résiduelle de l´aflatoxine B1, et des antibiotiques utilisés pour contrôler la croissance microbienne indésirée durant le processus de fermantation des biocarburants. Il faudrait également mener des recherches afin d´évaluer le risque de niveaux résiduels de méthanol dans le glycérol résultant de la production de biodiesel lorsqu´il est utilisé comme ingrédient des alminets pour animaux, notamment dans la production lairière. **(ix).**~~ les dangers défines comme prioritaires par le présent groupe de travail.

Initiatives de la FAO (formation, renforcement des capacités, etc.)

- Promouvoir l'application du Code d'usages du Codex pour une bonne alimentation animale en vue de réduire les risques au minimum. **(i)**
- Améliorer la communication afin de sensibiliser les transformateurs de biocarburants (éthanol et biodiesel, par exemple), les éleveurs et l'industrie de l'alimentation animale sur la nécessité de procéder à des évaluations de sécurité sanitaire avant d'utiliser des sous-produits issus de la production de biocarburants dans les aliments destinés aux animaux. **(viii)**
- En collaboration avec l'OIE, élargir le Réseau international des autorités de sécurité sanitaire des aliments (INFOSAN) afin d'étudier les liens entre les situations d'urgence en matière de sécurité sanitaire de l'alimentation humaine et animale, et d'intégrer les changements appropriés, y compris les déclarations d'urgence relatives aux aliments pour animaux. **(xi)**
- Élaborer des plans d'intervention à mettre en œuvre aux niveaux national et régional en cas d'urgence lorsque des aliments et des aliments pour animaux présentent des risques pour la sécurité sanitaire. La FAO et l'OMS devraient concourir au développement et à l'application de ces plans. **(xi)**
- Formation, partout où cela est possible, de responsables, d'inspecteurs, de tous les secteurs de l'industrie de l'alimentation animale et de la chaîne de distribution, de l'industrie des productions animales, des éleveurs et autres parties concernées dans le domaine de la production d'aliments sains pour animaux à l'aide du matériel pédagogique disponible, tel que principes directeurs et manuels. La FAO, l'OMS et d'autres organisations devraient contribuer à l'élaboration des méthodes de formation. **(xii)**
- Organisation périodique, par la FAO et l'OMS, de réunions d'experts et d'autres rencontres afin d'assurer le suivi de la situation, d'actualiser l'information sur l'impact des aliments pour animaux sur la sécurité sanitaire des aliments, de promouvoir le dialogue entre partenaires et d'identifier les domaines auxquels il faut accorder une attention particulière. **(xiii)**

Références utiles

FAO/OMS, 2004. Code d'usages pour une bonne alimentation animale (CAC/RCP 54-2004), Rome (www.codexalimentarius.net/download/standards/10080/CXC_054_2004f.pdf).

FAO/OMS, 2001. Code d'usages en matière de mesures prises à la source pour réduire la contamination des denrées alimentaires par des substances chimiques (CAC/RCP 49-2001), Rome (disponible à l'adresse www.codexalimentarius.net/download/standards/373/CXP_049f.pdf).

FAO/OMS, 2007. Rapport de la *réunion d'experts sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires*, Rome (disponible à l'adresse http://www.fao.org/ag/againfo/resources/documents/A1507F.pdf

Les chiffres **(i), (ii).....(xi)..(xiii)** *figurant dans pratiquement toutes les sections du document font référence aux recommandations formulées dans le rapport sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires.*

FRANCE (English version)

Proposal for the scope and terms of reference of future work on animal feeding

At the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007) it has been pointed out that current Codex Food Safety Risk Assessment Methodology is not adequate to address food safety-related feed-safety issues. Producers around the world face the reality that different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Based on the deliberations and recommendations made by the experts in Rome, the report issued by FAO on February 2008, and accordingly to the agreement reached at 31st CAC in Geneva, Switzerland, an *Ad Hoc* Intergovernmental Task Force on Animal Feeding (TFAF) should be established in order to:

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks.
- Work on harmonisation of risk management tools in order to ensure safe food and fair trade.

The terms of reference for the TFAF should be to:

1. Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients. The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment; the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.**(ii)**
2. ~~Develop standards~~ Establish a prioritized list of hazards associated with feed and feed ingredients, in particular internationally most traded raw materials, with respect to food safety. If necessary such hazards could be covered by standards. In doing so the working group should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety and countries specific needs for further evaluation on specific hazards by international scientific expert committees.**(iii)**
3. 3. a) Review the existing Codex Codes regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety. ~~In doing so the working group should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed.~~ [out of working group's scope of work) Furthermore the working group should list all available options on risk management tools and make proposals for risk-proportionate risk management measures. **(x)** b) Establish criteria for the identification of emergency situations. Such criteria is essential in systems by which to exchange information on feed safety emergency situations (e.g. INFOSAN) *(see page 3 "FAO iniciative" – third bullet).*c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards *(see page 3 "FAO iniciative" – third bullet),*
4. Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed, in order to include specific provisions related to feed safety. **(iv)**
5. The working group should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.

[Out of working group's scope of work]

~~Considering the recommendations, the following issues should be analyzied under the scope of the specific Committees:~~

~~**CCMAS (vi)** should develop inexpensive and accurate screening methods for the detection and quantification of dioxins, dibenzofurans and dioxin like PCBs in feed and feed ingredients.~~

~~**CCMAS (vii)** should develop rapid and semi quantitative screening methods for detection of aflatoxin B1 in both feed and feed ingredients. The methods should be simple enough for use by non technical personnel and inexpensive so as to encourage their use.~~

Research by Experts from FAO and WHO should be focused on:

- ~~Research on rates of transfer and accumulation of dioxins, debenzofurans, and dioxin like PCBs from feed to edible tissue in animal derived products and management measures should be continued **(v)**~~
- ~~Determining the fate and residual concentration of aflatoxin B1 and any antibiotics used to control unwanted microbial growth during the biofuels fermentation process. Research is also needed to evaluate the risk of~~

~~residual levels of methanol in glycerol from biodiesel production when it is used as a feed ingredient, particularly in dairy production.~~ **~~(ix)~~** the hazards listed as priorities by this working group.

FAO iniciative (training, capacity building, etc.)

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks. **(i)**
- Communication should be improved to raise the awareness among biofuel (e.g. ethanol and biodiesel) processors, livestock producers and the feed industry of the need for safety assessments prior to the use in animal feeds of by-products from the production of biofuels. **(viii)**
- The international emergency notification system for food (INFOSAN) should be expanded in collaboration with the OIE to consider linkages between food and feed emergencies and to incorporate appropriate changes to include feed emergency notifications. **(xi)**
- Emergency response systems for feed and food should be developed at the national and regional levels to contribute to food safety. FAO and WHO should assist in the development and application of such systems. **(xi)**
- Training for regulators, inspectors, all sectors of the feed manufacturing and distribution chain, the livestock industry, farmers and other stakeholders relating to the production of safe feed should be carried out where possible using existing training materials, i.e. guidelines and manuals. FAO, WHO and other organizations should assist in the development of training methods. **(xii)**
- FAO and WHO should convene regular expert meetings and other fora to continue monitoring the situation, update information on the impact of feed on food safety, foster dialogue among partners and identify areas needing attention. **(xiii)**

Relevant literature

FAO/WHO. 2004. Code of practice on good animal feeding, (CAC/RCP 54-2004). Rome. (www.codexalimentarius.net/download/standards/10080/CXC_054_2004e.pdf).

FAO/WHO. 2001. Code of practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001). Rome. (available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety*. Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf).

The numbering **(i), (ii)…..(xi)..(xiii)***that appears in nearly all sections of the document refers to the recommendations in the report on Animal Feed Impact on Food Safety.*

GERMANY

Texts from E-mail: "….I fully support the approach of this document…"

WORKING DOCUMENT

Proposal for the scope and terms of reference of future work on animal feeding

At the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007) was identified different areas for further work on animal feed in relation to food safety.

In particular the experts ~~is has been~~ pointed out that current Codex Food Safety Risk Assessment Methodology is not adequate to address food safety-related feed-safety issues. Producers around the world face the reality that different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Based on the deliberations and recommendations made by the experts in Rome, the report issued by FAO on February 2008, and accordingly to the agreement reached at 31st CAC in Geneva, Switzerland, an *Ad Hoc* Intergovernmental Task Force on Animal Feeding (TFAF) should be established in order to:

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks.
- Work on harmonisation of risk management tools in order to ensure safe food and fair trade.

The terms of reference for the TFAF should be to:

1. Develop general principles and guidelines for the assessment of risk for feed ingredients ~~or categories o fingredients~~ including additives. The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment; the Risk Analysis Principles applied by the Codex Committee on Pesticide

Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.**(ii)**

2. Develop standards for feed and feed ingredients with respect to food safety. In doing so the ~~working group~~ TFAT should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety . If necessary ~~and countries specific needs~~ the TFAF should identify the need for further evaluation on specific hazards by international scientific expert committees (e.g.JECFA).**(iii)**

3. a) Review the existing Codex Codes regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety ~~In doing so the working group should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed. Furthermore, the working group should list all available options on risk management tools and make proposals for risk proportionate risk management measures~~ **(x)**
   b) Establish criteria for the identification of emergency situations. Such criteria is essential in systems by which to exchange information on feed safety emergency situations (e.g. INFOSAN)

4. *(see page 3 "FAO iniciative" – third bullet).*
   c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards *(see page 3 "FAO iniciative" – third bullet),*

5. Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed, in order to include specific provisions related to feed safety. **(iv)**

6. The ~~working group~~ TFAF should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.

Considering the recommendations of the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety, the following issues should be analyzed under the scope of the specific Committees:

CCMAS (vi) should develop inexpensive and accurate screening methods for the detection and quantification of dioxins, dibenzofurans and dioxin-like PCBs in feed and feed ingredients.

CCMAS (vii) should develop rapid and semi-quantitative screening methods for detection of aflatoxin B1 in both feed and feed ingredients. The methods should be simple enough for use by non-technical personnel and inexpensive so as to encourage their use.

Research by Experts from FAO and WHO should be focused on:

- Research on rates of transfer and accumulation of dioxins, dibenzofurans, and dioxin-like PCBs from feed to dible tissue in animal-derived products and management measures should be continued. **(v)**
- Determining the fate and residual concentration of aflatoxin B1 and any antibiotics used to control unwanted microbial growth during the biofuels fermentation process. Research is also needed to evaluate the risk of residual levels of methanol in glycerol from biodiesel production when it is used as a feed ingredient, particularly in dairy production. **(ix)**

FAO iniciative (training, capacity building, etc.)

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks. **(i)**
- Communication should be improved to raise the awareness among biofuel (e.g. ethanol and biodiesel) processors, livestock producers and the feed industry of the ne
- ed for safety assessments prior to the use in animal feeds of by-products from the production of biofuels. **(viii)**
- The international emergency notification system for food (INFOSAN) should be expanded in collaboration with the OIE to consider linkages between food and feed emergencies and to incorporate appropriate changes to include feed emergency notifications. **(xi)**
- Emergency response systems for feed and food should be developed at the national and regional levels to contribute to food safety. FAO and WHO should assist in the development and application of such systems. **(xi)**
- Training for regulators, inspectors, all sectors of the feed manufacturing and distribution chain, the livestock industry, farmers and other stakeholders relating to the production of safe feed should be carried out where possible using existing training materials, i.e. guidelines and manuals. FAO, WHO and other organizations should assist in the development of training methods. **(xii)**

- FAO and WHO should convene regular expert meetings and other fora to continue monitoring the situation, update information on the impact of feed on food safety, foster dialogue among partners and identify areas needing attention. **(xiii)**

Relevant literature

FAO/WHO. 2004. Code of practice on good animal feeding, (CAC/RCP 54-2004). Rome. (www.codexalimentarius.net/download/standards/10080/CXC_054_2004e.pdf).

FAO/WHO. 2001. Code of practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001). Rome. (available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety*. Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf).

The numbering **(i), (ii)…..(xi)..(xiii)***that appears in nearly all sections of the document refers to the recommendations in the report on Animal Feed Impact on Food Safety.*

IRAN

Codex Electronic Working Group on Future work on Animal Feeding

Islamic republic of Iran (IRR.), would like to thanks the Chair and co-chairs of the Electronic working group for preparing the Working Document and is pleased to offer the following comments to the proposed terms of reference for future work on animal feeding:

1-we believe that existing risk-assessment procedural manual which is developed by Codex provide a sufficient basis for evaluating animal feed hazards. We support utilizing these established Codex standard to develop risk-assessment criteria to apply to feed ingredients or categories of ingredients.

2-we believe that use of safe feed ingredients will lead to produce safe feed, so we are agree to develop standards for feed ingredients that may have potentially hazards(like heavy metals, biologic toxins,…) impact on food safety.

3- Iran does not see the need for additional work on traceability/product tracing specifically for animal feeds. We believe that Codex texts already provide sufficient generic and specific guidance on traceability/product tracing.

In summary, IRR suggests that the Electronic working group give priority to the proposed Item NO **2 : *"Develop standards for feed and feed ingredients with respect to food safety***".

Islamic republic of Iran hopes the above comments are helpful for the further development of the document.

IRELAND

Text from E-mail: "…I have examined your draft proposal for terms of reference for future work by CODEX on animal feed and would agree with the suggestions contained therein. I welcome that you have taken into consideration the conclusions and recommendations of the FAO/WHO Expert Meeting on 'Animal Feed Impact on Food Safety'. In addition, the majority of the collective inputs from EU Member States contained in the Commissions submission appear to have been taken into account.

While not explicit in the terms of reference, what I would hope is that there will be a focus on the reduction (minimisation) of the impact on animal feeds from the presence of Undesirable Substances and Products. If not already envisaged, the outcome should include international standards for tolerable maximum limits for contaminants in feed (similar to the EU USP legislation). This work should include a standardisation of methods of analysis applied and tolerances (both analytical and sampling) allowable.

The work should also include the development of guidelines on the use of HACCP in the production and use of animal feed and the facilitation of training in HACCP for stakeholders / regulators.

While it would be desirable, but in practice impossible, to achieve a consistent approach on GM issues, consideration might however be given to the potential impact of other emerging technologies, e.g. Nanotechnology, on feed safety…."

NETHERLANDS

Text from E-mail: "… I support your suggestions for future work of TFAF.

With regards to the recommendations about development of screening methods (top of page 3) I want to comment that, as far as I am aware, until now CCMAS is not involved in methods of analysis for feed and feed ingredients and for this reason I think it is very important that for this purpose CCMAS should take full account of, and collaborate with other

international organizations already involved in standardization of methods of analysis for feed, viz. ISO, AOAC International and CEN. I have included my suggestions with track changes in the ToR …"

WORKING DOCUMENT

Proposal for the scope and terms of reference of future work on animal feeding

At the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007) it has been pointed out that current Codex Food Safety Risk Assessment Methodology is not adequate to address food safety-related feed-safety issues. Producers around the world face the reality that different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Based on the deliberations and recommendations made by the experts in Rome, the report issued by FAO on February 2008, and accordingly to the agreement reached at 31st CAC in Geneva, Switzerland, an *Ad Hoc* Intergovernmental Task Force on Animal Feeding (TFAF) should be established in order to:

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks.
- Work on harmonisation of risk management tools in order to ensure safe food and fair trade.

The terms of reference for the TFAF should be to:

1. Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients. The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment; the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.**(ii)**
2. Develop standards for feed and feed ingredients with respect to food safety. In doing so the working group should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety and countries specific needs for further evaluation on specific hazards by international scientific expert committees.**(iii)**
3. a) Review the existing Codex Codes regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety. In doing so the working group should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed. Furthermore the working group should list all available options on risk management tools and make proposals for risk-proportionate risk management measures. **(x)**
   b) Establish criteria for the identification of emergency situations. Such criteria is essential in systems by which to exchange information on feed safety emergency situations (e.g. INFOSAN) *(see page 3 "FAO iniciative" – third bullet).*
   c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards *(see page 3 "FAO iniciative" – third bullet),*
4. Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed, in order to include specific provisions related to feed safety. **(iv)**
5. The working group should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.

Considering the recommendations, the following issues should be analyzed under the scope of the specific Committees:

CCMAS (vi) should develop inexpensive and accurate screening methods for the detection and quantification of dioxins, dibenzofurans and dioxin-like PCBs in feed and feed ingredients.

CCMAS (vii) should develop rapid and semi-quantitative screening methods for detection of aflatoxin B1 in both feed and feed ingredients. The methods should be simple enough for use by non-technical personnel and inexpensive so as to encourage their use.

For this purpose CCMAS should take full account of, and collaborate with other international organizations involved in standardization of methods of analysis, viz. ISO, AOAC International and CEN.

Research by Experts from FAO and WHO should be focused on:

- Research on rates of transfer and accumulation of dioxins, dibenzofurans, and dioxin-like PCBs from feed to edible tissue in animal-derived products and management measures should be continued. **(v)**

- Determining the fate and residual concentration of aflatoxin B1 and any antibiotics used to control unwanted microbial growth during the biofuels fermentation process. Research is also needed to evaluate the risk of residual levels of methanol in glycerol from biodiesel production when it is used as a feed ingredient, particularly in dairy production. **(ix)**

FAO initiative (training, capacity building, etc.)

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks. **(i)**
- Communication should be improved to raise the awareness among biofuel (e.g. ethanol and biodiesel) processors, livestock producers and the feed industry of the need for safety assessments prior to the use in animal feeds of by-products from the production of biofuels. **(viii)**
- The international emergency notification system for food (INFOSAN) should be expanded in collaboration with the OIE to consider linkages between food and feed emergencies and to incorporate appropriate changes to include feed emergency notifications. **(xi)**
- Emergency response systems for feed and food should be developed at the national and regional levels to contribute to food safety. FAO and WHO should assist in the development and application of such systems. **(xi)**
- Training for regulators, inspectors, all sectors of the feed manufacturing and distribution chain, the livestock industry, farmers and other stakeholders relating to the production of safe feed should be carried out where possible using existing training materials, i.e. guidelines and manuals. FAO, WHO and other organizations should assist in the development of training methods. **(xii)**
- FAO and WHO should convene regular expert meetings and other fora to continue monitoring the situation, update information on the impact of feed on food safety, foster dialogue among partners and identify areas needing attention. **(xiii)**

Relevant literature

FAO/WHO. 2004. Code of practice on good animal feeding, (CAC/RCP 54-2004). Rome. (www.codexalimentarius.net/download/standards/10080/CXC_054_2004e.pdf).

FAO/WHO. 2001. Code of practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001). Rome. (available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety*. Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf).

The numbering **(i), (ii)…..(xi)..(xiii)***that appears in nearly all sections of the document refers to the recommendations in the report on Animal Feed Impact on Food Safety.*

NEW ZEALAND

Codex Electronic Working Group on Future work on Animal Feeding

New Zealand comments on the draft working document on the scope and terms of reference of future work on animal feeding.

New Zealand thanks the Chair and co-chairs of the Electronic working group for preparing the working document and would like to make the following comments:

New Zealand would like to draw attention to the mandate of the working group is to define the scope and terms of reference for future Codex work on animal feeding taking into account the conclusions and recommendations of the FAO/WHO Expert meeting on Animal feed impact on food safety; and

Prepare a proposal as to suitable mechanisms to advance any new work in this area. It is important that the working group approach two areas of it mandate sequentially. The current draft does not contain any analysis of the different options for advancing the work in this area.

Scope of new work

In New Zealand's view the scope of any new work in the area of animal feeding should be to facilitate the implementation of the Codex Code of Practice on Good Animal Feeding through the development of further specific guidance risk assessment and risk management of hazards associated with feed and feed ingredients. It is important that any new work in the area of animal feeding is closely linked to the code of practice and is developed to help countries with the effective its effective implementation.

Terms of Reference

New Zealand supports the first proposal in general but believes that it needs to be reworded as follows:

Develop general principles and guidelines for the risk assessment of hazards in feed and feed ingredients' to make it clear that the emphasis of this work is on the hazards associated with feed and feed ingredients used in food production.

New Zealand does not see the need for additional work on traceability/product tracing specifically for animal feeds. We believe that Codex texts already provide sufficient generic and specific guidance on traceability/product tracing.

With regard to proposal 2 New Zealand believes that the proposal as currently drafted is by no means clear. If the proposal is to develop risk management guidelines for individual feeds it would entail a substantial amount of work and the scope of any such work will need further clarification.

Options for advancing new work on animal feeding

New Zealand believes that the working document should include some analysis and comment on the various mechanisms available to advance any future work on animal feeding. It may well be that a new task force on Animal feeding is the most efficient and expeditious way of advancing any new work but such a recommendation must be made after due consideration of alternative mechanisms.

As regards further research by FAO and WHO it is not clear if these are directly linked to the ToR/work proposals. Any recommendations for further scientific work should be linked more closely with specific work proposals and also picked up in project documents.

FAO capacity building initiatives - This may well be important but does not belong in this document.

New Zealand hopes the above comments are helpful for the further development of the document.

NORWAY

Norway would like to thank you for this opportunity to submit comments to the proposed terms of reference for future work on animal feeding. We appreciate the work done on this draft, which in a proper way reflects the different ideas that has been put forward in the report from the FAO/WHO Expert meeting, and from the 31st session in CAC.

It is important that the terms of reference on future work on animal feeding falls within the scope of the Codex Alimentarius mandate, the goals of the Codex Alimentarius Commission Strategic Plan 2008 – 2013 and that the workload for the Task Force is manageable.

Therefore, Norway recommends that the EWG looks into the proposed draft Terms of Reference and decides which issues are to be given priority and suggests that the following subjects are given priority in future work:

1. Development of general principles and guidelines for the assessment of risk for feed ingredients or category of ingredients as tool for evaluation of contaminants and other undesirable substances in feed, and possible carry over to food (Terms of Reference 1).
    a. Falls within the scope of Goal 1.1 in the Strategic Plan. *The CAC will develop international standards, guidelines and recommendations based on scientific principles for the reduction of health risk along the entire food chain, including feed when appropriate.*
    b. General principles and guidelines for feed ingredients or categories of ingredients are needed to give a framework and form a basis when performing risk assessment, this especially in regard to possible carry over to food. The impact on feed and food safety of feed contaminated with dioxins and related substances are examples experienced.
2. Develop a prioritized list of hazards as outlined in the recommendation from the FAO/WHO Expert group (Terms of Reference 2).
    a. This falls within the scope of the CAC to protect the health of consumers and ensuring fair practices in the food trade.
    b. The safety of animal feed must be assessed prior to its feeding to animals. The report from the FAO/WHO Expert meeting especially points out animal feed as an important route by which hazards can enter into the food chain, and the complexity of both the consideration of the safety of animals and the safety of humans. Therefore we feel that developing a list of hazards related to undesirable substances in feed with relevance to public health absolutely should be a topic for priority.

3. Establish criteria for identification of emergency situations (Terms of Reference 3b).
    a. As mentioned in the proposal such criteria are essential in a system for exchange of information on feed safety emergency situations
    b. Revision should be considered to better reflect the influence of feed on food safety. Although this topic is partly covered by the existing Codes, establishing criteria for notification will be a step forward.

To give some examples which support the need for further work we would like to mention that new sources of feed like co-products from bio fuel industry are becoming more available. The fish farming industry is looking for new protein sources as the present supply of fish protein is limited.

In general we would like to underline that the global trade of feed and feed ingredients are increasing, and the role of feed in production of safe food is recognized worldwide. Recent events have shown its impact on public health, food security and feed and food trade.

Norway further urges that the EWG be aware of existing and ongoing work on OIE guidelines on control and animal feed hazards (aquatic animal feed published, terrestrial animal feed still under consideration).

To conclude, Norway suggests that the Terms of Reference for the Future Task Force on Animal Feeding give priority to the proposed draft **Terms of Reference 1, 2 and 3b.**

THAILAND

Thailand would like to give comments on **the terms of reference for the TFAF** as follows**:**

Item 2

We are of the opinion that in addition to standards, Code of Practice is also useful for potential hazard control. Apart from the Code of Practice on Good Animal Feeding which has already been established by Codex, the Task Force on Animal Feeding may consider developing other Code of Practice for specific feed or feed ingredients.

Moreover, we are of the opinion that the reference to international scientific expert committees may be redundant to the first part which has already mentioned to the international organization, we propose to amend the sentence as follow:

"Develop standards *and/or Code of Practice* for feed and feed ingredients with respect to food safety. In doing so the working group should take into consideration the prioritized list *and/or countries specific needs* of hazards *by recognized* ~~of~~ international ~~relevance as recommended by the~~ *organization such as* the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety[4] ~~and countries specific needs for further evaluation on specific hazards by international scientific expert committees.(iii)~~"

Item 3 a)

The last sentence of 3 a) which reads "Furthermore the working group should … and make proposals for risk-proportionate risk management measure." is not so clear to us particularly the phrase "make proposals for risk-proportionate risk management measures". We would appreciate clarification as well as example of such cases.

Item 4

As the scope and terms of reference of the Task Force on Animal Feeding should include food-safety related feed-safety issues which falls within the scope and mandate of Codex, we propose to amend the last part of the sentence as follows:

"Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemical[6], which also encompasses feed, in order to include specific ~~provisions related to feed safety~~ *provision to address food safety related to feed safety*. (iv)"

UNITED KINGDOM

Text from E-mail:

"*1. Many thanks for forwarding the draft working paper to me for comments.*

2. I fully support all of your suggestions for future work and consider the following should be included in future priority work areas for the Codex Task Force on Animal Feeding:

guidelines for science-based risk management;

worldwide classification and standardisation of feed;

global system for exchange of information in feed control emergency

situations and in cases of rejected imported feed;

minimisation of the presence of undesirable substances; and

hazards associated with co-products (e.g. from the biofuels industry).

I believe these suggestions will go a long way to enhancing public and animal health throughout the world if acceptable to, and taken forward by, the wider Codex membership.

3. The Code of Practice on Good Animal Feeding was adopted by Codex in 2004. Since then there has been a substantial increase in the worldwide

trade in feed and feed ingredients. This trend is forecast to continue and, in view of differences of approach in respect of feed safety controls, there is an increased risk of resulting trade obstacles.

4. No other Codex Committee routinely discusses animal feed issues, and since these are many and varied there is a pressing need for work to resume in the Task Force on Animal Feeding. Animal feed is the first part of the human food chain throughout the world; therefore, for an organisation like Codex to be seen to continue to stall work in such an important area leaves it open to criticism. I am sure most informed members of the global feed sector would agree that the majority of the problems they encounter are in respect of feed materials that are traded internationally. It is essential that Codex does not lose this unique opportunity to build on the excellent work that the Task Force on Animal Feeding has done to date. If Codex does not grasp this opportunity, other international fora for taking forward this valuable work should be explored.

5. I have taken the liberty of making some editorial suggestions in the form of tracked changes on the draft working document (please see the attachment).

6. I look forward to working with you and other members of the Electronic Working Group in the weeks and months ahead."

WORKING DOCUMENT

Proposal for the scope and terms of reference of future work on animal feeding

At the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007) it was pointed out that current Codex Food Safety Risk Assessment Methodology is not adequate to address food safety-related feed-safety issues. Different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Based on the deliberations and recommendations made by the experts in Rome, the report issued by FAO on February 2008, and accordingly to the agreement reached at 31st CAC in Geneva, Switzerland, an *Ad Hoc* Intergovernmental Task Force on Animal Feeding (TFAF) should be established in order to:

- promote and build upon the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks; and
- work on harmonisation of risk management tools and consistency of approach in order to ensure safe food and fair trade throughout the world.

The terms of reference for the TFAF should be to:

1. Develop general principles and guidelines for the assessment of risk for feed ingredients. The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment; the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.**(ii)**
2. Develop standards for feed and feed ingredients with respect to food safety. In doing so, TFAF should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety and member countries' specific needs for further evaluation on specific hazards by international scientific expert committees.**(iii)**
3. a) Review the existing Codex Codes regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety. In doing so, TFAF should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed. Furthermore, TFAF should list all available options on risk management tools and make proposals for risk-proportionate risk management measures. **(x)**
   b) Establish criteria for the identification of emergency situations. Such criteria are essential in systems in order to exchange information on feed safety emergency situations (e.g. INFOSAN - *see page 3 "FAO initiative" – third bullet).*

c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards *(see page 3 "FAO initiative" – third bullet).*

4. Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed, in order to include specific provisions related to feed safety. **(iv)**

5. The working group should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.

As regards, the recommendations, the following issues should be analyzed under the scope of the specific Committees:

CCMAS (vi) should develop inexpensive and accurate screening methods for the detection and quantification of dioxins, dibenzofurans and dioxin-like PCBs in feed and feed ingredients.

CCMAS (vii) should develop rapid and semi-quantitative screening methods for detection of aflatoxin B1 in both feed and feed ingredients. The methods should be simple enough for use by non-technical personnel and inexpensive so as to encourage their use.

Research by Experts from FAO and WHO should be focused on:

- Research on rates of transfer and accumulation of dioxins, dibenzofurans, and dioxin-like PCBs from feed to edible tissue in animal-derived products and management measures should be continued. **(v)**
- Determining the fate and residual concentration of aflatoxin B1 and any antibiotics used to control unwanted microbial growth during the biofuels fermentation process. Research is also needed to evaluate the risk of residual levels of methanol in glycerol from biodiesel production when it is used as a feed ingredient, particularly in dairy production. **(ix)**

FAO initiative (training, capacity building, etc.)

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks. **(i)**
- Communication should be improved to raise awareness among biofuel (e.g. ethanol and biodiesel) processors, livestock producers and the feed industry of the need for safety assessments prior to the use in animal feeds of by-products from the production of biofuels. **(viii)**
- The international emergency notification system for food (INFOSAN) should be expanded in collaboration with the World Organisation for Animal Health (OIE) to consider linkages between food and feed emergencies and to incorporate appropriate changes to include feed emergency notifications. **(xi)**
- Emergency response systems for feed and food should be developed at national and regional levels to contribute to food safety. FAO and WHO should assist in the development and application of such systems. **(xi)**
- Training for regulators, inspectors, all sectors of the feed manufacturing and distribution chain, the livestock industry, farmers and other stakeholders relating to the production of safe feed should be carried out where possible using existing training materials, e.g. guidelines and manuals. FAO, WHO and other organizations should assist in the development of training methods. **(xii)**
- FAO and WHO should convene regular expert meetings and other fora to continue monitoring the situation, update information on the impact of feed on food safety, foster dialogue among partners and identify areas needing attention. **(xiii)**

Relevant literature

FAO/WHO. 2004. Code of practice on good animal feeding, (CAC/RCP 54-2004). Rome. (www.codexalimentarius.net/download/standards/10080/CXC_054_2004e.pdf).

FAO/WHO. 2001. Code of practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001). Rome. (available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety.* Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf).

The numbering **(i), (ii)…..(xi)..(xiii)** *that appears in nearly all sections of the document refers to the recommendations in the report on Animal Feed Impact on Food Safety.*

UNITED STATES

On behalf of the government of the United States, the U.S. delegate to the Electronic Working Group on Animal Feeding submits these comments on the draft proposal for scope and terms of reference of future work on animal feeding by the Codex Alimentarius Commission (Codex).

The U.S. delegate appreciates the efforts of the Co-Chairs in preparing the draft proposal. The United States concurs with the drafters that the scope and terms of reference for any future work by Codex should mirror the recommendations emanating from the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety. During this meeting, international experts representative of Codex-member countries conducted a comprehensive review of current knowledge on animal feed and its impact on food safety and international food and feed trade. As noted in the consensus report produced from the FAO/WHO Expert Meeting, these experts discussed a diverse list of hazards that present human health risk and disrupt trade, and recognized the need to improve access to affordable protein for growing populations in many countries that are chronically short of food by enhancing the efficiency of animal production.

Based upon its careful analysis, the United States believes that many of the recommendations contained in the report emanating from FAO/WHO Exert Meeting fall outside the scope of Codex.

Consistent with that finding, the U.S. delegate believes the draft terms of reference prepared by the Co-Chairs, while well-intentioned, far exceed what is appropriate, advisable or achievable by a future Codex *Ad Hoc* Intergovernmental Task Force on Good Animal Feeding. Additionally, the draft terms of reference are so broad that it is difficult to envision what the output from the *Ad Hoc* Intergovernmental Task Force on Good Animal Feeding would be. The initial Task Force began its work with equally broad and unfocused terms of reference, and spent the majority of the first two meetings refocusing the terms of reference. The Task Force eventually produced an excellent document; however, this accomplishment required that the Task Force be extended well beyond the original time allotted by the Secretariat. The United States is very concerned that the broad scope of these draft terms of reference will lead to the same difficulties that were experienced by the first Task Force.

As an alternative, the United States recommends that the draft scope and terms of reference of future work on animal feeding be revised to focus on recommendations of the FAO/WHO Expert Meeting that we believe may warrant attention within a Codex task force framework – namely, develop criteria to apply to contaminants that will enable countries to prioritize the risk associated with the contaminants based upon local conditions, use, and exposure of animals; prioritize a list of hazards (contaminants) of international relevance that may warrant future attention; and recommend criteria for notification of trading partners of emergency situations involving feed or feed ingredients. The USG recommendations have drawn from the draft terms of reference numbers 1, 2, and 3b. The following are more specific comments on the draft terms of reference document.

Comments on Draft EWR Proposal for Scope and Terms of Reference

As stated previously, the United States believes the current draft proposal for scope and terms of reference of future work on animal feeding being reviewed by the Electronic Working Group (EWG) exceeds what is appropriate, advisable or achievable by a future Codex feed task force. We offer the following specific comments concerning the proposed terms of reference:

1. **Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients:** The United States believes that existing risk-assessment methodologies that have been adopted and implemented by Codex provide a sufficient basis for evaluating animal feed hazards that may warrant consideration. We support utilizing these established Codex methodologies to develop science-based risk-assessment criteria to apply to feed contaminants that will enable countries to prioritize the risks based upon local conditions, use, and exposure of animals, and the resultant impact, if any, on human health. The United States is concerned with the reference in the draft terms of reference to microbial risks. This was not specifically cited in the FAO/WHO Expert Meeting report. The U.S. government notes that a direct relationship between microbial risks in feed of food-producing animals and disease in humans consuming food of animal origin is poorly documented.

2. **Develop standards for feed and feed ingredients with respect to food safety:** The United States points out that this proposed term of reference exceeds the recommendation emanating from the FAO/WHO Expert Meeting. The FAO/WHO Expert Meeting clearly focused on developing a prioritized list of hazards of international relevance, and its recommendation predicates any potential development of standards upon the completion of such a prioritization exercise. The United States supports work by the Task Force to prioritize a list of hazards (contaminants) of international relevance that may warrant future attention.

   Developing feed and feed ingredient standards for food safety would be a monumental task given the thousands of feed ingredients utilized in feed manufacturing around the world, many in localized circumstances. As noted in #1 above, the United States believes this is well beyond the ability of this Task Force, and does not support this undertaking.

   The United States believes the development of safety standards for feed and feed ingredients is more appropriately a function for national governments to pursue, based upon the use of prudent scientific risk-assessment principles applied to specific feed hazards that may warrant consideration. The U.S. Food and Drug Administration, as part of an ambitious Animal Feed Safety System initiative, is in the process of developing process-control regulations applicable to feed and feed ingredients in the United States. But a necessary first step in this initiative is a scientific

risk-assessment and prioritization of feed hazards. The United States recommends that the EWG confine this term of reference to a discussion focusing on a prioritization of hazards of international relevance – consistent with the recommendation of the FAO/WHO Expert Meeting.

3. **Review existing Codex Codes regarding emergency situations…to include specific provisions on feed emergencies related to food safety; establish criteria for identification of emergency situations; and prepare a proposal for a traceability/product-tracing system for identification of source hazards:** The United States believes this is a task best accomplished within existing Codex committees, and not by a time- and finance-limited animal feeding task force. The USG supports this being made a recommendation to the Secretariat, and that the Secretariat charge each Codex committee with reviewing the appropriate Code and reporting its applicability to animal feed and feed ingredients. Further, the United States points out that the existing Code of Practice on Good Animal Feeding already includes specific provisions on Traceability/Product Tracing (Section 4.3), which includes language on recordkeeping sufficient to allow for prompt trace-back of feed and feed ingredients to the immediate previous source and trace-forward to the next subsequent recipients if known or probable adverse effects on consumers' health are identified. This same section of the existing Code of Practice on Good Animal Feeding also includes provisions *[Section 4.3.1]* on Special Conditions Applicable to Emergency Situations involving feed and feed ingredients. The USG believes this section needs more clarification and supports recommending criteria for notification of trading partners of emergency situations involving feed or feed ingredients.

   In summary, the United States recommends that:

   - Term of reference 3a be revised to be a recommendation to the Codex Secretariat;
   - Term of reference 3b be accepted; and
   - Term of reference 3c be stricken for the reasons stated above, and because the work on traceability is handled most appropriately elsewhere within Codex.

4. **Review existing Codex Code of Practice for Source-Directed Measures to Reduce Contamination of Food with Chemicals…to include specific provisions related to feed safety:** The United States recommends that this term of reference be deleted, and that the EWG recommend that the Codex committee that developed the Code of Practice for Source-Directed Measures to Reduce Contamination of Food with Chemicals be charged with reviewing the potential application of this code to animal feed.

5. **Collaborate with other Codex committees and other international bodies within FAO, WHO, OIE and IPPC:** This far-reaching term of reference clearly is beyond the reach of a time- and financially limited Codex animal feed task force. It envisions the establishment of a permanent committee within Codex, which far transcends the charge of the Codex ALINORM that authorized the EWG. Further, the United States believes this is a function of the Codex Secretariat to direct. As such, the United States urges that this draft term of reference be deleted. The United States recognizes the value of collaboration, and believes that it will be important for the Task Force to consider and build upon all of the work undertaken by other Codex committees, as well as other international bodies, when developing terms of reference for the Task Force so as not to reinvent – or contradict – what has been accomplished already.

Other Recommendations

The United States appreciates the work of Denmark and Mexico in developing the draft terms of reference and the transparency in which they addressed the FAO/WHO experts report. However, since this is a terms of reference, we believe it is inappropriate for the document to include recommendations regarding specific issues that should be analyzed under the scope of specific committees, research recommended by the FAO/WHO experts, or specific FAO actions (training, capacity building, etc). Therefore, the United States recommends that the section on page 3 that begins with the phrase "Considering the recommendations…." and continues on page 4 until the reference to "Relevant Literature" should be deleted from this document.

As a member of the EWG, I again express the appreciation of the United States to the Co-Chairs for their work in preparing this draft. We urge that the recommendations contained herein be incorporated into the draft scope and terms of reference. I am pleased to provide any further information that you may require.

EUROPEAN COMMUNITY

1. Introduction

At the 31st CAC held in Geneva in June-July 2008, it was agreed to establish an electronic working group to prepare:

1. A proposal for the scope of and the terms of reference for future work in animal feeding. The proposal should take into consideration the conclusions ands recommendations of the FAO/WHO Expert Meeting on Animal Feeding Impact on Food Safety.

2. a proposal for suitable mechanisms for Codex to carry out this work, including but not limited to the establishment of an Ad Hoc Intergovernmental Task Force.

At the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2008), it was pointed out that general principles and guidelines for the assessment of risks from feed ingredients or categories of ingredients should be developed. The current Codex Food Safety Risk Assessment methodologies need to be applied and adapted to better address the particular situation of food safety-related feed-safety issues. ~~Producers around the world face the reality that different~~ Different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

The future work on animal feeding in Codex should have the following objectives:

- Further promote and build upon the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks.
- Further work on harmonisation of risk management tools ~~in order~~ at Codex level to contribute to ensure safe food and fair trade.

The electronic working group proposals take into account the recommendations of the above mentioned expert meeting. When these recommendations are used they are referenced in bold in brackets in the text.

2. Scope and terms of reference for ~~the TFAF should be to~~ future work on animal feeding

1. Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients. The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment; the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.**(ii)**

   The general principles and guidelines should also include consideration of the need to address the establishment of rates of transfer and accumulation from feed to edible tissues in animal-derived products according to the characteristics of the hazard.

2. Identify a list of hazards or feeds and feed ingredients of international relevance that should be subject to the development of standards.

3. Review and propose if necessary amendments to the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed, in order to include more clearly relevant specific provisions related to feed safety. **(iv)**

4. Regarding information exchange concerning emergency situations relating to feed:

   a) Review and propose if necessary amendments to the existing Codex Codes regarding food safety emergency situations, which also encompass feed, in order to include more clearly relevant specific provisions on feed emergencies related to food safety. The TFAF should list all available options on risk management tools and make proposals for risk-proportionate risk management measures. **(x)**
   b) Establish criteria for the identification of emergency situations to be notified internationally. Such criteria are essential for the efficacy of systems of exchange of information about feed safety emergency situations c) Prepare a proposal for a traceability/product tracing system for the identification of the sources of hazards

5. The ~~working group~~ TFAF should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC. . The TFAF should also consider previous work carried out at Codex regarding Animal Feeding including the report of the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2008).

3. Suitable mechanisms

To carry out effectively the proposed work the electronic working group considers that the best option is to establish an *ad hoc* Intergovernmental Task Force.

Relevant literature

1. FAO/WHO. 2004. Code of practice on good animal feeding, (CAC/RCP 54-2004). Rome. (www.codexalimentarius.net/download/standards/10080/CXC_054_2004e.pdf).

2. FAO/WHO. 2001. Code of practice for source directed measures to reduce contamination of food with chemicals

(CAC/RCP 49-2001). Rome. (available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

3. FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety.* Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf).

EUROPEAN FEED MANUFACTURERS' FEDERATION (FEFAC)

Please find hereafter the comments of FEFAC, the European compound feed and premix manufacturers federation on the working document.

Please note the FEFAC entirely supports the position of IFIF, the International Feed Industry Federation on the working document. Our comments should be seen as complementary to the IFIF position, providing an additional viewpoint from the European feed manufacturers resulting from experience with Risk assessment and Risk management decisions at European level with regard to feed safety

In this context we are most grateful to the chair and co-chair who reflected on some of our earlier remarks and suggestions in the framework of the present working document (cf FEFAC comment to CODEX circular letter CL 2007/19-CAC). We would also like to express again our gratitude to the FAO expert group on animal feed impact on food safety, which has delivered an excellent report with pertinent and practical recommendations on how to move forward on the issue of global feed safety standardization.

We were truly impressed by the large consensus established among governments at the 31st CAC meeting in July recognizing the importance of animal feed safety for food safety of foodstuffs of animal origin and the willingness to continue work on animal feeding at CODEX level. The high number of governments participating in the E-WG is a perfect illustration of this consensus.

FEFAC therefore remains fully confident in the Electronic working group capacity and competence to develop a practical proposal for the draft terms of reference for a future task Force for animal feed and indeed recommendations on how to address more systematically feed safety related issues falling in the mandate of existing permanent CODEX committees. In this context we like to raise a request for clarification with the Chair and co-chair whether the present working mandate for the E-WG would also cover potential recommendations to review, ie improve the legibility of the CODEX procedural manual as regards references to feed and feed safety in the standardization work of CODEX.

FEFAC remains fully committed to provide the European industry expertise required by the Electronic working group to fulfil its mandate. We look forward to the contributions of governments and other stakeholders to the Electronic working group and an interactive exchange of views and debate on the way forward on development and harmonization of global feed safety standards which ultimately will benefit to consumers of foodstuffs of animal origin but also facilitate global trade with safe feedingstuffs.

WORKING DOCUMENT

Proposal for the scope and terms of reference of future work on animal feeding

At the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007) it has been pointed out that current Codex Food Safety Risk Assessment Methodology is not adequate to address food safety-related feed-safety issues. Producers around the world face the reality that different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Based on the deliberations and recommendations made by the experts in Rome, the report issued by FAO on February 2008, and accordingly to the agreement reached at 31st CAC in Geneva, Switzerland, an *Ad Hoc* Intergovernmental Task Force on Animal Feeding (TFAF) should be established in order to:

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks.
- Work on harmonisation of risk management tools in order to ensure safe food and fair trade.

The terms of reference for the TFAF should be to:

1. Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients. The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment; the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.**(ii)**

FEFAC position : this is the key recommendation by the FAO expert group as harmonised Risk assessment guidance provides the basis for future standardization work. The absence of feed safety specific risk assessment guidance has led often to diverging risk management measures both by competent control authorities and feed safety assurance systems

2. Develop standards for feed and feed ingredients with respect to food safety. In doing so the working group should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety and countries specific needs for further evaluation on specific hazards by international scientific expert committees.**(iii)**

FEFAC position : we fully support this recommendation if the key focus is directed towards hazards of international relevance is connected to feedstuffs traded at global level. We fully support the FAO expert view that particular attention should be given to feed safety hazards linked to co-products from the Biofuel industry.

3. a) Review the existing Codex Codes regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety. In doing so the working group should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed. Furthermore the working group should list all available options on risk management tools and make proposals for risk-proportionate risk management measures. **(x)**
   b) Establish criteria for the identification of emergency situations. Such criteria is essential in systems by which to exchange information on feed safety emergency situations (e.g. INFOSAN) *(see page 3 "FAO iniciative" – third bullet).*
   c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards *(see page 3 "FAO iniciative" – third bullet),*

FEFAC position :

a) we fully supports this recommendation as it is crucial to address the present gaps in the CODEX system linked to feed safety standardisation work.

b) we welcome this proposal as a global exchange information system on emergency situation will be of direct benefit to competent control authorities and operators by reducing reaction time and implementation of corrective measures.

c) This point is closely connected to b) FEFAC supports this approach which should lead to closer cooperation between operators and competent control authorities regarding the identification of the source of emerging hazards.

4. Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed, in order to include specific provisions related to feed safety. **(iv)**

FEFAC position : we consider the CODEX code a useful document and welcome it's review in order to identify the need for potential inclusion ie, update of feed safety related specific provisions

5. The working group should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.

Considering the recommendations, the following issues should be analyzed under the scope of the specific Committees:

CCMAS (vi) should develop inexpensive and accurate screening methods for the detection and quantification of dioxins, dibenzofurans and dioxin-like PCBs in feed and feed ingredients.

CCMAS (vii) should develop rapid and semi-quantitative screening methods for detection of aflatoxin B1 in both feed and feed ingredients. The methods should be simple enough for use by non-technical personnel and inexpensive so as to encourage their use.

FEFAC position : recognizes the urgent need to clarify the role and competences of intergovernmental bodies with regard to feed safety standardization work and in particular the role and compentences of the standing committees with CODEX, such as CCMAS. Development and Standardisation of analytical methods at international level is of crucial relevance to ensure the functioning of international trade of feedingstuffs. Feed business operators are facing multiple challenges as competent authorities use different methods and sampling plans.

We would recommend however to carry out a systematic review of all standing CODEX Committee mandates in the light of the recent restructuring and assignment of new competences.

Research by Experts from FAO and WHO should be focused on:

- Research on rates of transfer and accumulation of dioxins, dibenzofurans, and dioxin-like PCBs from feed to edible tissue in animal-derived products and management measures should be continued. **(v)**

FEFAC position : we consider the issue of transfer rates from feed to food to be a of key importance for developing a harmonised Risk assessment methodology. FEFAC would recommend to consider the establishment a FAO data base collecting this information from governments and stakeholders and identifying information gaps to encourage data generation.

- Determining the fate and residual concentration of aflatoxin B1 and any antibiotics used to control unwanted microbial growth during the biofuels fermentation process. Research is also needed to evaluate the risk of residual levels of methanol in glycerol from biodiesel production when it is used as a feed ingredient, particularly in dairy production. **(ix)**

FEFAC position : welcomes the recommendation to determine residual levels of antibiotics used during the biofuels fermentation process in particular with a view to the recent RASFF alerts on Monensin residues in deactivated dried yeasts from the Brazilian cane ethanol industry. We support the review of all feed safety hazards linked to co-products from the Biofuel industry used in all relevant feeding systems (not only dairy feed).

FAO iniciative (training, capacity building, etc.)

FEFAC , as member of IFIF, supports all the below-listed FAO initiatives and is willing to actively cooperate with FAO by providing expertise and experts to implement them. IFIF expects the FAO/IFIF manual on good animal feeding to be published shortly following its successful peer review by WTO and FAO. FEFAC has proposed to IFIF to take up the issue of hazard characterization of co-products of the Biofuel sector as a key discussion point for the second IFIF feed regulators meeting on 26 January 2009 in Atlanta.

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks. **(i)**
- Communication should be improved to raise the awareness among biofuel (e.g. ethanol and biodiesel) processors, livestock producers and the feed industry of the need for safety assessments prior to the use in animal feeds of by-products from the production of biofuels. **(viii)**
- The international emergency notification system for food (INFOSAN) should be expanded in collaboration with the OIE to consider linkages between food and feed emergencies and to incorporate appropriate changes to include feed emergency notifications. **(xi)**
- Emergency response systems for feed and food should be developed at the national and regional levels to contribute to food safety. FAO and WHO should assist in the development and application of such systems. **(xi)**
- Training for regulators, inspectors, all sectors of the feed manufacturing and distribution chain, the livestock industry, farmers and other stakeholders relating to the production of safe feed should be carried out where possible using existing training materials, i.e. guidelines and manuals. FAO, WHO and other organizations should assist in the development of training methods. **(xii)**
- FAO and WHO should convene regular expert meetings and other fora to continue monitoring the situation, update information on the impact of feed on food safety, foster dialogue among partners and identify areas needing attention. **(xiii)**

Relevant literature

FAO/WHO. 2004. Code of practice on good animal feeding, (CAC/RCP 54-2004). Rome. (www.codexalimentarius.net/download/standards/10080/CXC_054_2004e.pdf).

FAO/WHO. 2001. Code of practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001). Rome. (available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety*. Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf).

The numbering **(i), (ii)…..(xi)..(xiii)***that appears in nearly all sections of the document refers to the recommendations in the report on Animal Feed Impact on Food Safety.*

INTERNATIONAL DAIRY FEDERATION (IDF)

IDF welcomes and supports the proposed scope and terms of reference of future Codex work on animal feeding, dated 12 September 2008.

We would like to note that:

- IDF had suggested at the 4th Session of the Ad Hoc Intergovernmental Codex Task Force on Animal Feeding (in 2003) that consideration be given to the development of an Annex to the existing Codex Code of Practice on Good Animal Feeding (CAC/RCP 54-2004) on application of HACCP principles in feed production.

[ref. Codex ALINORM 03/38A, para. 3 and CRD 4 prepared by the International Dairy Federation (IDF), in consultation with Comité du Commerce des Céréales, Aliments du Bétail, Oléagineux, Huiles et Graisses et Agrofournitures de l'Union Européenne (COCERAL), Consumers International (CI), the European Feed Manufacturers' Federation (FEFAC), the Grain and Feed Trade Association (GAFTA), and the International Feed Industry Federation (IFIF)]

The electronic Working Group may wish to consider our earlier proposal in light of its current relevance and by taking into account the conclusions and recommendations from the most recent FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety.

- IDF would like to strongly support the proposal of the International Feed Industry Federation (IFIF) with regard to the development of Codex Guidelines for Feed Safety Risk Assessment. We would like to thank the Chair for having incorporated the proposal in the proposed Terms of Reference (first bullet point).

- IDF would like to draw attention to the Terms of Reference of the Codex Committee on Contaminants in Foods (CCCF) and the Codex Committee on Methods of Analysis and Sampling (CCMAS) [ref. Codex Alimentarius Commission Procedural Manual, seventh edition, pages 157 and 161].

The development of new methods is outside the current role and remit of CCMAS. The current Terms of Reference of CCCF include "consideration and elaboration of methods of analysis and sampling for the determination of contaminants and naturally occurring toxicants in food and feed".

INTERNATIONAL FEED INDUSTRY FEDERATION (IFIF)

IFIF appreciates the opportunity to participate in the Codex Electronic Working Group on Future Work on Animal Feeding (EWG) which is charged with bringing forward, for Codex Commission consideration, proposed Terms of Reference (TORs) for possible future work in addition to suggesting ways Codex might deal with feed and feed-related matters.

In response to the Working Document received on September 12, 2008 from the EWG, IFIF wishes to make the following comments in regard to selected paragraphs:

Bullet Point:

• Work on harmonisation of risk management tools in order to ensure safe food and fair trade.

IFIF wishes to highlight the difference between risk management and risk assessment. The inclusion of risk management at this point would significantly expanding the work of a Codex Task Force, should it be included in the TORs. Risk assessments are carried out under feed safety assurance in all major F4 countries (Europe, USA, Brazil and China). Such risks assessments are not carried out in a consistent manner due to the absence of guidance from Codex and conflicting national rules, which lead to trade impediments. Restricting the TORs to risk assessment would keep the work of a second Feed Task Force focused and manageable.

The terms of reference for the TFAF should be to:

1. Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients.The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment ; the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.(ii)

IFIF sees this as a key recommendation: providing Codex guidance on risk assessment as the basis for future standardization work. In itself, this objective might not necessitate the full force of a second Feed Task Force, however, combined with other objectives it would. We have examples of where individual feed industries have adapted risk assessment in their quality assurance schemes (see our comment under FAO Initiatives below) with regard to raw materials and which should be considered. We request that the guidance provided meets the requirements of all feed production methods including home mixing.

Note: IFIF points out that the reference to microbial risks is not specifically sited in the FAO/WHO Expert Meeting Report and that there is not good documentation to support a direct relationship between microbial risks in feed, for food producing animals, and disease in humans consuming animal protein food.

2. Develop standards for feed and feed ingredients with respect to food safety. In doing so the working group should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety and countries specific needs for further evaluation on specific hazards by international scientific expert committees. (iii)

IFIF fully supports the need for this recommendation, particularly hazards of international relevance, but recognises the enormity of the task given the hundreds of ingredients utilised in feed manufacturing. Codex might like to request FAO undertake a first step by developing a common nomenclature for all major ingredients. The prominent issue for feed safety is the likelihood of contaminants. We ask that nutritional feed standards already available, such as NRC, AAFCO and FEDIAF, etc, be taken into consideration. While many of the issues raised by the Joint Expert Meeting may be worthwhile, much of the work could be done through existing Codex Committees. If that should be the case, then the

remaining portion is either not sufficient to form another committee or is not appropriately charged to a second Codex Feed Task Force.

a) Review the existing Codex Codes regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety. In doing so the working group should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed. Furthermore the working group should list all available options on risk management tools and make proposals for risk-proportionate risk managementmeasures. (x)

b) Establish criteria for the identification of emergency situations. Such criteria are essential in systems by which to exchange information on feed safety emergency situations (e.g. INFOSAN) (see page 3 “FAO initiative” - thirdbullet).

c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards (see page 3 “FAO initiative” - third bullet),

IFIF supports these recommendations as they addresses present gaps in the Codex system linked to feed safety standardisation work and would establish a global information exchange system for emergency situations, directly benefiting competent control authorities and operators by reducing reaction time and implementation of corrective measures. Care should be taken to ensure this measure does not impact inadvertently on business efficiency and lead to job losses and trade restrictions. We consider the statement: “Furthermore, the working group should list all available options on risk management tools and make proposals for risk-proportionate risk management measures.(x)” is stepping outside the scopemission of the working group. We recommend a review of existing alert systems that operate at national level to provide useful background information. Finally, traceability/product tracing systems might be more suitably handled elsewhere in Codex and this should be considered by the EWG.

3. Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals , which also encompasses feed, in order to include specific provisions related to feed safety. (iv)

IFIF considers the Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals should include feed; The Code should be reviewed to assess that it does and should set maximum levels implemented at national levels when they do exist (for feed and food). However, this could be performed after risk assessment has been completed and may more appropriately be handled by the committee that developed the Code of Practice for Source – Directed Measures to Reduce Contamination of Food with Chemicals.

4. The working group should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.

Collaboration with international quality assurance schemes, standards, etc is to be supported.

Considering the recommendations, the following issues should be analyzed under the scope of the specific Committees:

CCMAS (vi) should develop inexpensive and accurate screening methods for the detection and quantification of dioxins, dibenzofurans and dioxin-like PCBs in feed and feed ingredients.

CCMAS (vii) should develop rapid and semi-quantitative screening methods for detection of aflatoxin B1 in both feed and feed ingredients. The methods should be simple enough for use by non-technical personnel and inexpensive so as to encourage their use.

IFIF would recommend a systematic review of all standing Codex Committees in the light of the recent restructuring and assignment of new competencies. However, we would be concerned with the focus on dioxins, as this appears to be a waning issue in the global scientific community. Also there are a lot of quick tests for aflatoxin on the market. Measuring B1 - the most toxic - as a quick test seems to add little value to current testing technology. However, advancement of spectral analysis to identify chemical hazards is important. Research by Experts from FAO and WHO should be focused on:

- Research on rates of transfer and accumulation of dioxins, dibenzofurans, and dioxin-like PCBs from feed to edible tissue in animal-derived products and management measures should be continued. (v)

The issue of transfer rates from feed to food is of critical importance for developing harmonised risk assessment methodology.

- Determining the fate and residual concentration of aflatoxin B1 and any antibiotics used to control unwanted microbial growth during the bio fuels fermentation process. Research is also needed to evaluate the risk of residual levels of methanol in glycerol from biodiesel production when it is used as a feed ingredient, particularly in dairy production. (ix)

The feed industry would welcome the recommendation to determine residual levels of antibiotics used during the biofuels fermentation process. We support the review of all feed safety hazards linked to co-products from the Biofuel industry.

FAO initiative (training, capacity building, etc.)

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks. (i)

Overall, IFIF supports all the listed FAO initiatives under this heading and is willing to actively co-operate with FAO by proving expertise and experts to implement them. The feed industry has made significant progress in adopting the Codex Code of Practice on Good Animal Feeding since its launch in mid-2004. All the Federation's national feed associations (which together represent approximately 80% of compound feed produced) have adopted the Code. For example, our F4 member associations (which account for approximately 70% of all compound feed produced) produced according to professional guidance issued by Sindiraçoes (through its F&FSP programme), AFIA (SFSF programme), FEFAC (EFMC programme) and CFIA (HACCP programme) - all are compliant with the Codex Code.

- Communication should be improved to raise the awareness among biofuel (e.g. ethanol and biodiesel) processors, livestock producers and the feed industry of the need for safety assessments prior to the use in animal feeds of byproducts from the production of bio fuels. (viii)

IFIF believes it has a central role in communicating greater awareness of issues to industry stakeholders. The focus on topical ingredients such as feed-safety hazards linked to co-products from the biofuels industry, is of concern due to on-going work at many of the world's universities. However, these issues should be the primary concern of countries producing these products. Better communication among feed-chain stakeholders should be encouraged in order to better understand the multitude of sanitary regulations as well as allowable MRLs where appropriate.

- The international emergency notification system for food (INFOSAN) should be expanded in collaboration with the OIE to consider linkages between food and feed emergencies and to incorporate appropriate changes to include feed emergency notifications. (xi)

- Emergency response systems for feed and food should be developed at the national and regional levels to contribute to food safety. FAO and WHO should assist in the development and application of such systems. (xi)

- Training for regulators, inspectors, all sectors of the feed manufacturing and distribution chain, the livestock industry, farmers and other stakeholders relating to the production of safe feed should be carried out where possible using existing training materials, i.e. guidelines and manuals. FAO, WHO and other organizations should assist in the development of training methods. (xii)

IFIF supports the expansion of the INFOSAN or the setting up of a similar project as a global early-warning system in which the feed industry is involved. The recent experience with Monensin residues in Brazilian dried deactivated yeast from cane ethanol production and the resurgent issue on melamin contamination are a clear illustration for the need for a more effective global warning system to allow competent control authorities and the feed industry to stay 'on top of events' and define early on adequate risk management responses to ensure effective damage limitation or even damage prevention.

The soon-to-be-published FAO/IFIF Feed Manual on Good Animal Feeding, must be considered as one of the central training tools available to the feed industry. It has been funded by STDF (FAO, OIE, WHO, WTO and the World Bank) and promotes the adoption of the Codex Code of Practice on Good Animal Feeding. IFIF is working with universities to establish a degree and continuing education programmes.

- FAO and WHO should convene regular expert meetings and other fora to continue monitoring the situation update information on the impact of feed on food safety, foster dialogue among partners and identify areas needing attention. (xiii)

IFIF has established an annual International Feed Regulators Meeting. IFIF is working with FAO in developing the effectiveness and reach of this meeting and wishes to bring this initiative to the attention of the EWG when reviewing this point.

Finally, IFIF asks that the EWG re-examines the recommendations contained in the report of FAO/WHO Expert Meeting and mentioned above to ensure that those identified fall within the scope of the Codex mandate.

WORLD RENDERERS ORGANISATION (WRO)

WORKING DOCUMENT : ***Agreed areas of action by WRO [09.10.2008]***

Proposal for the scope and terms of reference of future work on animal feeding

At the Joint FAO/WHO Expert meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007) it has been pointed out that current Codex Food Safety Risk Assessment Methodology is not adequate to address food safety-

related feed-safety issues. Producers around the world face the reality that different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Based on the deliberations and recommendations made by the experts in Rome, the report issued by FAO on February 2008, and accordingly to the agreement reached at 31st CAC in Geneva, Switzerland, an *Ad Hoc* Intergovernmental Task Force on Animal Feeding (TFAF) should be established in order to:

- Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks.
- Work on harmonisation of risk management tools in order to ensure safe food and fair trade.

The terms of reference for the TFAF should be to:

1 Develop general principles and guidelines for the assessment of risk for feed ingredients or categories of ingredients. The principles and guidelines should be developed on the basis of the Codex Principles for Risk Analysis and considering the relevant Codex texts such as: the Principles and Guidelines for the Conduct of Microbiological Risk assessment; the Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; the Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods; and the Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.**(ii)**

2 Develop standards for feed and feed ingredients with respect to food safety. In doing so the working group should take into consideration the prioritized list of hazards of international relevance as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety and countries specific needs for further evaluation on specific hazards by international scientific expert committees.**(iii)**

3 a) Review the existing Codex Codes regarding emergency situations, which also encompass feed, in order to include specific provisions on feed emergencies related to food safety. In doing so the working group should consider whether current international regulatory authorities and bodies (such as JECFA) are sufficient to take care of feed safety risk assessment, or whether new risk assessment capacity is needed. Furthermore the working group should list all available options on risk management tools and make proposals for risk-proportionate risk management measures. **(x)**
b) Establish criteria for the identification of emergency situations. Such criteria is essential in systems by which to exchange information on feed safety emergency situations (e.g. INFOSAN) *(see page 3 "FAO iniciative" – third bullet).*
c) Prepare a proposal for a traceability/product tracing system for the identification of the source of hazards *(see page 3 "FAO iniciative" – third bullet),*

4 Review the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed, in order to include specific provisions related to feed safety. **(iv)**

5 The working group should take full account of, and collaborate with, other Codex committees and other international bodies within FAO, WHO, OIE and IPPC.

Considering the recommendations, the following issues should be analyzed under the scope of the specific Committees:

CCMAS (vi) should develop inexpensive and accurate screening methods for the detection and quantification of dioxins, dibenzofurans and dioxin-like PCBs in feed and feed ingredients.

CCMAS (vii) should develop rapid and semi-quantitative screening methods for detection of aflatoxin B1 in both feed and feed ingredients. The methods should be simple enough for use by non-technical personnel and inexpensive so as to encourage their use.

Research by Experts from FAO and WHO should be focused on:

- ***Research on rates of transfer and accumulation of dioxins, dibenzofurans, and dioxin-like PCBs from feed to edible tissue in animal-derived products and management measures should be continued. (v)***
- Determining the fate and residual concentration of aflatoxin B1 and any antibiotics used to control unwanted microbial growth during the biofuels fermentation process. ***Research is also needed to evaluate the risk of residual levels of methanol in glycerol from biodiesel production when it is used as a feed ingredient, particularly in dairy production. (ix)***

FAO iniciative (training, capacity building, etc.)

- ***Promote the application of the Codex Code of Practice on Good Animal Feeding in order to minimize risks. (i)***

- ***Communication should be improved to raise the awareness among biofuel (e.g. ethanol and biodiesel) processors, livestock producers and the feed industry of the need for safety assessments prior to the use in animal feeds of by-products from the production of biofuels. (viii)***
- The international emergency notification system for food (INFOSAN) should be expanded in collaboration with the OIE to consider linkages between food and feed emergencies and to incorporate appropriate changes to include feed emergency notifications. **(xi)**
- Emergency response systems for feed and food should be developed at the national and regional levels to contribute to food safety. FAO and WHO should assist in the development and application of such systems. **(xi)**
- ***Training for regulators, inspectors, all sectors of the feed manufacturing and distribution chain, the livestock industry, farmers and other stakeholders relating to the production of safe feed should be carried out where possible using existing training materials, i.e. guidelines and manuals. FAO, WHO and other organizations should assist in the development of training methods. (xii)***
- FAO and WHO should convene regular expert meetings and other fora to continue monitoring the situation, update information on the impact of feed on food safety, foster dialogue among partners and identify areas needing attention. **(xiii)**

Relevant literature

FAO/WHO. 2004. Code of practice on good animal feeding, (CAC/RCP 54-2004). Rome. (www.codexalimentarius.net/download/standards/10080/CXC_054_2004e.pdf).

FAO/WHO. 2001. Code of practice for source directed measures to reduce contamination of food with chemicals (CAC/RCP 49-2001). Rome. (available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety*. Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf).

The numbering **(i), (ii)…..(xi)..(xiii)** *that appears in nearly all sections of the document refers to the recommendations in the report on Animal Feed Impact on Food Safety.*

Annex III

Codex Electronic Working Group

on Animal Feed

2nd draft document (Spanish/French/English) and comments received to this document

Comments from: Canada, Germany, Netherlands, Norway, United Kingdom, United States, Euroepan Community, International Feed Industry Federation, World Renderers Organisation (WRO)

Contents

Working document 2. DRAFT

Background

At the 31st CAC held in Geneva in June-July 2008, it was agreed to establish an electronic working group (E-WG) to prepare:

1. A proposal for the scope and terms of reference of future work on animal feeding. In doing so the working group should take into consideration the conclusions and recommendations of the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety[20]; and
2. A proposal as to suitable mechanisms for Codex to carry out this work, including, but not limited to, the establishment of an Ad hoc Intergovernmental Task Force.

At the Joint FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007), it was pointed out that general principles and guidelines for the assessment of risks from feed ingredients or categories of ingredients should be developed. The current Codex Food Safety Risk Assessment methodologies need to be applied and adapted to better address the particular situation of food safety-related feed-safety issues. Different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Animal feed is the first part of the human food chain throughout the world. The majority of food safety problems encountered are in respect of feed materials that are traded internationally. In addition, attention should be paid to the facts that:

1. The food chain is becoming increasingly complex;
2. The demand for food of animal origin is strongly increasing, especially in less developed countries; and
3. International trade in feeding stuffs is the largest global feed and food commodity trade by volume and it is still expanding.

All the food scares and incidents that occur with food products of animal origin, especially including those deriving from animal feed, demonstrate the need for standards to follow a comprehensive and integrated approach throughout the food chain.

After careful consideration of the recommendations of the FAO/WHO Expert Meeting, the E-WG has identified those that are within the mandate of Codex. These issues, more or less, deal with prevention of contamination at the source (feed), prior to their introduction into the food chain, and the E-WG believes these issues to be of major importance in future Codex work on animal feeding. The areas of priority, as identified by the E-WG, are as follows:

A prioritized list of hazards.

The E-GW believes that it is of major importance to follow the recommendation of the FAO/Expert Meeting on Animal Feed Impact on Food Safety to develop a list of hazards (contaminants in feed ingredients/feed additives) of international relevance that may warrant future attention. In developing such a list it is important to take into account the opinions of the individual Codex members in order to ensure that the prioritization of hazards is developed with due concern to the various local conditions and the problems that may follow from contamination of feed ingredients intended for international trade.

The E-WG is fully aware that the expert meeting mentioned above did not address microbial risks.

Criteria for the identification of emergency situations

The E-GW recognizes the need to ensure exchange of information in emergency situations. The development of criteria to identify and categorize such emergency situations is an important precondition for already existing systems of exchange of information, such as INFOSAN, to function efficiently.

Criteria for specific science-based risk assessment

Establishing specific science-based criteria would be an important step forward as they will be a valuable tool, that will enable countries to prioritize the risks based upon local conditions, use, and exposure of animals, and the resultant impact, if any, on human health.

[20] FAO/WHO, 2007. Report of the *Expert Meeting on Animal Feed Impact on Food Safety*. Rome. (Available at ftp://ftp.fao.org/docrep/fao/010/a1507e/a1507e00.pdf)

Existing Codex texts – possible gaps in relation to feed-related food safety issues

Principles and guidelines covering important areas regarding food safety already exist within the Codex framework. The E-WG agrees with the opinion stated by the FAO/WHO Expert Meeting that it should be examined to which extend the existing Codex texts concerning risk analysis principles; exchange of information concerning emergency situations and rejection of imported food; and Source Directed Measures to Reduce Contamination of Food with Chemicals are directly applicable to feed issues.

The E-WG believes that addressing the issues mentioned above would constitute a great step forward for Codex in the area of feed related food safety, as well as a valuable asset in implementing the Code of Practice on Animal Feeding[21] .

Proposal for the scope and terms of reference of future work on animal feeding

The items below includes the issues that the E-WG believes would be of major importance of future Codex work on animal feeding:

(The items below are not listed in order of priority)

1. Examine the existing Codex texts concerning risk analysis principles:
   a. Working Principles for Risk Analysis for Application in Framework of the Codex Alimentarius[22];
   b. The Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods[23] ;
   c. The Risk Analysis Principles applied by the Codex Committee on Pesticide Residues[24]; and
   d. Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods[25].
   e. Principles and Guidelines for the Conduct of Microbiological Risk assessment[26].
2. Examine the existing Codex texts on exchange of information concerning emergency situations and rejection of imported food:
   a. Codex Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations[27]; and
   b. Guidelines for the Exchange of Information between Countries on Rejection of Imported Food[28].
3. Examine the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals[29] , which also encompasses feed.

The Codex texts mentioned in item 1, 2 and 3 should be examined in order to identify possible gaps in relation to feed-related food safety issues. The outcome of the examination on existing gaps, if any, should be passed on to the Codex Commission for further consideration.

4. Develop a guideline on how to apply the existing Codex risk assessment methodologies to the various types of hazards related to contaminants that can be present in feed ingredients including feed additives used for food

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[21] FAO/WHO, 2004. *Code of Practice on Good Animal Feeding*, (CAC/RCP 54-2004). Rome. (available at http://www.codexalimentarius.net/download/standards/10080/CXP_054e.pdf)

[22] FAO/WHO, 2006. *Working Principles for Risk Analysis for Application in Framework of the Codex Alimentarius.* Codex Alimentarius Commission procedural manual, Seventeenth edition. Joint FAO/WHO Food Standards Programme. Rome. (Available at ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17e.pdf).

[23] FAO/WHO. 2007. *Risk Analysis Principles Applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods.* Codex Alimentarius Commission Procedural manual, Seventeenth edition. Joint FAO/WHO Food Standards Programme. Rome. (Available at ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17e.pdf).

[24] FAO/WHO. 2007. *Risk analysis Principles Applied by the Codex Committee on Pesticide Residues*, Codex Alimentarius Commission Procedural manual, Seventeenth edition. Joint FAO/WHO Food Standards Programme. Rome. (Available at ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17e.pdf)

[25] FAO/WHO. 2007. *Risk analysis Principles Applied by the Codex Committee on Residues of Veterinary Drugs in Foods.* Codex Alimentarius Commission Procedural manual, Seventeenth edition. Joint FAO/WHO Food Standards Programme. Rome. (Available at ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17e.pdf)

[26] FAO/WHO. 2001. *Principles and Guidelines for the Conduct of Microbiological Risk Assessment,* (CAC/GL 30). (Available at http://www.codexalimentarius.net/download/standards/357/CXG_030e.pdf)

[27] *Principles and guidelines for the exchange of information in food safety emergency situations* (CAC/GL 19-1995) (Available at http://www.codexalimentarius.net/download/standards/36/CXG_019e.pdf)

[28] *Guidelines for the exchange of information between countries on rejection of imported food* (CAC/GL 25-1997) (Available at www.codexalimentarius.net/download/standards/353/CXG_025e.pdf)

[29] FAO/WHO. 2001. *Code of practice for source directed measures to reduce contamination of food with chemicals* (CAC/RCP 49-2001). Rome. (Available at www.codexalimentarius.net/download/standards/373/CXP_049e.pdf)

producing animals. The guideline should include specific science-based risk assessment criteria to apply to feed contaminants. These criteria should be developed utilizing the established Codex methodologies.

The guideline should also include consideration of the need to address the establishment of rates of transfer and accumulation from feed to edible tissues in animal-derived products according to the characteristics of the hazard.

The guideline should enable countries to prioritize the risks based upon local conditions, use, and exposure of animals, and the impact, if any, on human health.

5. Develop a prioritized list of hazards (contaminants in feed ingredients including feed additives) of international relevance that may warrant future attention.

   In doing so, due consideration should be given to the prioritized list of hazards as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety. The prioritization of hazards should take account of the potential transfer of contaminants/residues from feed to edible animal products (meat, fish, milk, eggs).

   The list including hazards of high priority could be forwarded to the Codex Committee on Contaminants in Foods for further consideration.

6. Establish criteria for the identification of emergency situations to be notified internationally. Such criteria are essential for the efficacy in already existing systems by which to exchange information about food and feed safety emergency situations such as e.g. INFOSAN that might be expanded to also cover feed.

Proposal as to suitable mechanisms for Codex to carry out this work

The E-WG has considered suitable ways for Codex to proceed with the six issues above, either in one or more of the existing Codex Committees or in an ad hoc Intergovernmental Task Force on Animal Feeding.

Some members prefer that the work should be carried out by the already existing Codex Committees. Other members have pointed out that, although it is possible to address animal feeding issues within a number of the existing Codex committees, none of the committees routinely discuss animal feed issues. Feed experts do not normally attend meetings in the Codex Committees and consequently the committees may not have sufficient expertise in the feed area.

However, after giving thorough consideration to the comments from the various members of the E-WG, it is recommended that the examination of the different Codex texts mentioned in item 1, 2 and 3 above should be dealt with by the different Codex Committees that originally developed these texts.

With regard to a Task Force, there is no clear indication for or against. Some members are against, some are for, and others are partly for a Task Force if certain conditions are meet, e.g. that the scope is limited to only a few issues appropriate and achievable by a future Codex Task Force on Feed. In conclusion it is recommended that the work concerning item 4, 5 and 6 should be carried out by a new Task Force on Animal Feed. A dedicated Task Force could provide Codex with the necessary expertise on feed, and grouping related identified activities about animal feeding may be more effective and may ensure also more consistency, both in terms of content and in terms of timing.

Document de travail 2. AVANT-PROJET

Contexte

Lors de la 31e session de la Commission du Codex Alimentarius, qui s'est tenue à Genève en juin-juillet 2008, il a été convenu de constituer un groupe de travail électronique en vue de préparer :

1. une proposition concernant le champ d'application et le cadre de référence des travaux futurs sur l'alimentation animale. À cet égard, le groupe de travail devrait tenir compte des conclusions et des recommandations de la réunion d'experts FAO/OMS sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires[30] 11 ;
2. une proposition sur les mécanismes appropriés qui permettraient au Codex d'effectuer ces travaux, y compris, mais sans s'y limiter, la création d'un Groupe intergouvernemental spécial.

Lors de la réunion d'experts mixte FAO/OMS sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires (Rome, Italie, octobre 2007), il a été souligné que des principes généraux et des directives devraient être élaborés pour l'évaluation des risques issus d'ingrédients des produits d'alimentation animale ou de catégories d'ingrédients. Il est indispensable que les méthodologies actuelles appliquées par le Codex pour évaluer les risques liés à la sécurité sanitaire des denrées alimentaires soient appliquées et adaptées afin de mieux tenir compte des problèmes particuliers de sécurité sanitaire des aliments pour animaux liés à la sécurité sanitaire des denrées alimentaires. Les différentes méthodologies d'évaluation des risques appliquées par les membres du Codex peuvent engendrer des résultats largement différents et donc des décisions contradictoires pour le contrôle des risques, au détriment du commerce international et de la sécurité des consommateurs.

Les aliments pour animaux constituent le premier maillon de la chaîne d'alimentation de l'Homme dans le monde entier. La majorité des problèmes rencontrés en matière de sécurité sanitaire des denrées alimentaires concernent les matières premières échangées au niveau international. En outre, il convient de noter ce qui suit :

1. la chaîne alimentaire gagne sans cesse en complexité ;
2. la demande en aliments d'origine animale est en forte hausse, notamment dans les pays moins développés ;
3. le commerce international des aliments pour animaux est le plus important commerce international de produits d'alimentation animale et humaine en termes de volume, et il poursuit son expansion.

Tous les incidents et crises alimentaires liés à des denrées alimentaires d'origine animale, notamment ceux dérivés de l'alimentation animale, montrent la nécessité d'établir des normes en vue de garantir une approche globale et intégrée tout au long de la chaîne alimentaire.

Après s'être minutieusement penché sur les recommandations de la réunion d'experts mixte FAO/OMS, le groupe de travail électronique a identifié celles qui relèvent du mandat du Codex. Les questions concernées portent, plus ou moins, sur la prévention des contaminations à la source (aliments pour animaux), préalablement à leur introduction dans la chaîne alimentaire. Le groupe pense que ces questions sont d'une importance capitale pour les futurs travaux du Codex sur l'alimentation animale. Les domaines prioritaires identifiés par le groupe de travail électronique sont les suivants :

Liste prioritaire des dangers.

Le groupe de travail électronique est d'avis qu'il est primordial de suivre la recommandation de la réunion d'experts FAO/OMS sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires, visant à élaborer une liste des dangers (contaminants dans les ingrédients/additifs d'aliments pour animaux) présentant un intérêt à l'échelon international et susceptibles d'exiger une attention particulière à l'avenir. Lors de l'élaboration d'une telle liste, il est important de tenir compte des avis des différents membres du Codex afin de garantir que l'ordre de priorité des dangers est défini dans le respect des conditions locales et des problèmes pouvant découler d'une contamination des ingrédients d'aliments pour animaux destinés au commerce international.

Le groupe de travail électronique est parfaitement conscient que la réunion d'experts indiquée ci-dessus n'a pas abordé les risques microbiens.

Critères d'identification des situations d'urgence

Le groupe de travail électronique reconnaît la nécessité d'assurer l'échange d'informations dans les situations d'urgence. L'élaboration de critères d'identification et de classement de telles situations est une condition sine qua non au bon fonctionnement des systèmes d'échange d'informations actuels, tels que INFOSAN.

[30] FAO/OMS, 2007. Rapport de la *réunion d'experts sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires,* Rome (disponible à l'adresse ftp://ftp.fao.org/docrep/fao/011/a1507f/a1507f00.pdf)

Critères pour une évaluation des risques basée sur des informations scientifiques spécifiques

L'élaboration de critères basés sur des informations scientifiques spécifiques constituerait une avancée importante, car ces critères seraient un précieux outil permettant aux pays de classer les risques par ordre de priorité sur la base des conditions locales, de l'application, de l'exposition des animaux et, le cas échéant, de l'impact résultant sur la santé humaine.

Textes actuels du Codex – lacunes éventuelles par rapport aux problèmes de sécurité sanitaire des denrées alimentaires liés aux aliments pour animaux

Il existe déjà, dans le cadre du Codex, des principes et des directives couvrant d'importants domaines liés à la sécurité sanitaire des denrées alimentaires. Le groupe de travail électronique se rallie à l'avis formulé par la réunion d'experts FAO/OMS, selon lequel il conviendrait de déterminer dans quelle mesure les textes actuels du Codex concernant les principes d'évaluation des risques, l'échange d'informations dans les situations d'urgence et les rejets de denrées alimentaires à l'importation ainsi que les mesures prises à la source pour réduire la contamination des denrées alimentaires par des substances chimiques sont directement applicables aux problèmes relatifs à l'alimentation animale.

Le groupe de travail électronique est d'avis que la prise en charge des problèmes ci-dessus constituerait un pas important pour le Codex en matière de sécurité sanitaire des denrées alimentaires liée aux aliments pour animaux, ainsi qu'un précieux atout dans la mise en œuvre du Code d'usages pour une bonne alimentation animale[31] .

Proposition concernant le champ d'application et le cadre de référence des travaux futurs sur l'alimentation animale

Les éléments ci-dessous incluent les questions qui, selon le groupe de travail électronique, sont d'une importance capitale pour les futurs travaux du Codex sur l'alimentation animale :

(Les éléments ci-dessous ne sont pas classés par ordre de priorité)

1. Examiner les textes actuels du Codex concernant les principes d'évaluation des risques :
    a. Principes de travail pour l'analyse des risques destinés à être appliqués dans le cadre du Codex Alimentarius[32] ;
    b. Principes en matière d'analyse des risques appliqués par le Comité du Codex sur les additifs alimentaires et le Comité du Codex sur les contaminants dans les aliments[33] ;
    c. Principes pour l'analyse des risques appliqués par le Comité du Codex sur les résidus de pesticides[34];
    d. Principes pour l'analyse des risques appliqués par le Comité du Codex sur les résidus de médicaments vétérinaires dans les aliments[35].
    e. Principes et directives régissant la conduite de l'évaluation des risques microbiologiques[36].
2. Examiner les textes actuels du Codex sur l'échange d'informations dans les situations d'urgence et les rejets de denrées alimentaires à l'importation :
    a. Principes et directives du Codex pour l'échange d'informations dans les situations d'urgence en matière de sécurité sanitaire des aliments[37];

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[31] FAO/WHO, 2004. *Code d'usages pour une bonne alimentation animale*, (CAC/RCP 54-2004). Rome. (disponible à l'adresse http://www.codexalimentarius.net/download/standards/10080/CXP_054f.pdf)

[32] FAO/OMS, 2006. *Principes de travail pour l'analyse des risques destinés à être appliqués dans le cadre du Codex Alimentarius.* Commission du Codex Alimentarius, manuel de procédure, dix-septième édition. Programme mixte FAO/OMS sur les normes alimentaires, Rome (disponible à l'adresse ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17f.pdf)

[33] FAO/OMS, 2007. *Principes en matière d'analyse des risques appliqués par le Comité du Codex sur les additifs alimentaires et le Comité du Codex sur les contaminants dans les aliments.* Commission du Codex Alimentarius, manuel de procédure, dix-septième édition. Programme mixte FAO/OMS sur les normes alimentaires, Rome (disponible à l'adresse ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17f.pdf).

[34] FAO/OMS, 2007. *Principes pour l'analyse des risques appliqués par le Comité du Codex sur les résidus de pesticides.* Commission du Codex Alimentarius, manuel de procédure, dix-septième édition. Programme mixte FAO/OMS sur les normes alimentaires, Rome (disponible à l'adresse ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17f.pdf)

[35] FAO/OMS, 2007. *Principes pour l'analyse des risques appliqués par le Comité du Codex sur les résidus de médicaments vétérinaires dans les aliments.* Commission du Codex Alimentarius, manuel de procédure, dix-septième édition. Programme mixte FAO/OMS sur les normes alimentaires, Rome (disponible à l'adresse ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17f.pdf)

[36] FAO/OMS, 2001. *Principes et directives régissant la conduite de l'évaluation des risques microbiologiques.* Alimentation et nutrition/Codex Alimentarius (CAC/GL 30) – Programme mixte FAO/OMS sur les normes alimentaires, Rome (disponible à l'adresse http://www.codexalimentarius.net/download/standards/357/CXG_030f.pdf).

b. Directives concernant les échanges d'informations entre pays sur les rejets de denrées alimentaires à l'importation[38].

3. Examiner le Code d'usages actuel du Codex en matière de mesures prises à la source pour réduire la contamination des denrées alimentaires par des substances chimiques[39], qui englobe également les aliments pour animaux.

Les textes du Codex indiqués aux points 1, 2 et 3 devraient être examinés en vue d'identifier d'éventuelles lacunes par rapport aux problèmes de sécurité sanitaire des denrées alimentaires liés aux aliments pour animaux. Les résultats de cet examen devraient être transmis à la Commission du Codex en vue d'un examen plus approfondi.

4. Élaborer une directive stipulant comment appliquer les méthodologies actuelles du Codex en matière d'évaluation des risques aux différents types de dangers liés aux contaminants susceptibles d'être présents dans les ingrédients d'aliments pour animaux, y compris leurs additifs, utilisés pour nourrir des animaux dont les produits sont destinés à la consommation humaine. Cette directive devrait inclure des critères d'évaluation des risques basés sur des informations scientifiques spécifiques à appliquer aux contaminants des aliments pour animaux. Ces critères devraient être définis au moyen des méthodologies actuelles du Codex.

   En outre, la directive devrait prendre en compte la nécessité d'envisager la mise en place de taux de transfert et d'accumulation depuis les aliments pour animaux vers les tissus comestibles des produits d'origine animale conformément aux caractéristiques du danger.

   La directive devrait permettre aux pays de classer les risques par ordre de priorité sur la base des conditions locales, de l'application, de l'exposition des animaux et, le cas échéant, de l'impact résultant sur la santé humaine.

5. Élaborer une liste prioritaire des dangers (contaminants présents dans les ingrédients d'aliments pour animaux, y compris leurs additifs) présentant un intérêt à l'échelon international et susceptibles d'exiger une attention particulière à l'avenir.

   À cet égard, il convient de tenir compte de la liste prioritaire des dangers recommandée par la réunion d'experts FAO/OMS sur l'impact de l'alimentation animale sur la sécurité sanitaire des denrées alimentaires. Le classement des dangers par ordre de priorité devrait tenir compte du transfert potentiel de contaminants/résidus depuis les aliments pour animaux vers les produits d'origine animale comestibles (viande, poisson, lait, œufs).

   La liste comprenant les dangers hautement prioritaires pourrait être transmise au Comité du Codex sur les contaminants dans les aliments en vue d'un examen plus approfondi.

6. Définir des critères d'identification des situations d'urgence à signaler à l'échelon international. De tels critères sont essentiels pour garantir l'efficacité des systèmes actuels d'échange d'informations concernant les situations d'urgence liées à la sécurité sanitaire des denrées alimentaires et des aliments pour animaux, tels que INFOSAN, qui pourraient être élargis à l'alimentation animale.

Proposition sur les mécanismes appropriés qui permettraient au Codex d'effectuer ces travaux

Le groupe de travail électronique a envisagé des moyens appropriés qui permettraient au Codex de traiter les six éléments ci-dessus au sein soit d'un ou plusieurs Comités du Codex, soit d'un Groupe spécial intergouvernemental sur l'alimentation animale.

Certains membres préfèrent que les travaux soient effectués par les comités actuels du Codex. D'autres ont souligné que, s'il est possible d'aborder des questions liées à l'alimentation animale au sein de plusieurs Comités actuels du Codex, aucun d'entre eux ne débat toutefois systématiquement de telles questions. Des experts en la matière n'assistent normalement pas aux réunions des Comités du Codex, lesquels, par conséquent, ne disposent pas nécessairement de toute l'expertise requise dans le domaine des aliments pour animaux.

Quoi qu'il en soit, après avoir minutieusement étudié les commentaires de ses différents membres, le groupe de travail électronique recommande que les textes du Codex mentionnés aux points 1, 2 et 3 ci-dessus soient examinés par les différents Comités du Codex à l'origine de ces textes.

S'agissant d'un Groupe spécial, rien ne va dans le sens ni à l'encontre de la création d'un tel groupe. Certains membres s'y opposent, d'autres préconisent cette idée et d'autres encore sont partiellement en faveur de la création d'un Groupe

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[37] *Principes et directives pour l'échange d'informations dans les situations d'urgence en matière de sécurité sanitaire des aliments* (CAC/GL 19-1995) (disponible à l'adresse http://www.codexalimentarius.net/download/standards/36/CXG_019f.pdf)

[38] *Directives concernant les échanges d'informations entre pays sur les rejets de denrées alimentaires à l'importation* (CAC/GL 25-1997) (disponible à l'adresse www.codexalimentarius.net/download/standards/353/CXG_025f.pdf)

[39] FAO/OMS, 2001. Code d'usages en matière de mesures prises à la source pour réduire la contamination des denrées alimentaires par des substances chimiques (CAC/RCP 49-2001), Rome (disponible à l'adresse www.codexalimentarius.net/download/standards/373/CXP_049f.pdf)

spécial si certaines conditions sont remplies (par exemple, à condition que le champ soit exclusivement limité à un petit nombre de questions appropriées et pouvant être débattues par un futur Groupe spécial sur les aliments pour animaux). En conclusion, il est recommandé que les travaux liés aux éléments 4, 5 et 6 soient effectués par un nouveau Groupe spécial sur les aliments pour animaux. La création d'un Groupe spécial dédié pourrait apporter au Codex l'expertise nécessaire en matière d'alimentation animale. De même, le regroupement d'activités identifiées apparentées sur l'alimentation animale pourrait être plus efficace et garantir une plus grande cohérence, tant en termes de fond que de timing.

Documento de Trabajo Segundo Borrador

Antecedentes

Durante la pasada 31va. Reunión de la Comisión del Codex Alimentarius (CAC), llevada al cabo en Ginebra en Junio-Julio de 2008, la Comisión acordó establecer un grupo de trabajo de trabajo electrónico (E-WG) para preparar:

1. Una propuesta sobre el alcance y el mandato del grupo de trabajo ad hoc intergubernatmental. Al hacer ésto, el E-WG debe tomar como referencia las deliberaciones y recomendaciones hechas durante la reunión de expertos de FAO/WHO Sobre el impacto de la alimentación animal en la seguridad y sanidad de los alimentos (Roma, Italia, octubre de 2007)[40] ; así como

2. Una propuesta en cuanto a los mecanismos convenientes para que el Codex realice este trabajo, incluyendo, pero no limitado, el establecimiento de un Grupo de acción ad hoc intergubernamental.

Durante la reunión de expertos de FAO/WHO Sobre el impacto de la alimentación animal en la seguridad y sanidad de los alimentos (Roma, Italia, octubre de 2007), se hizo notar que la actual metodología del Codex para la evaluación de riesgos en piensos y su repercusión en la sanidad de alimentos no es adecuada para abordar los problemas sanitarios derivados de la alimentación animal. Las metodologías actuales sobre análisis de riesgo para la sanidad de los alimentos del Codex necesitan ser aplicadas y ser adaptadas para que establezcan y aborden de una mejor manera los problemas que hay en la sanidad de los alimentos derivados de la alimentación animal.

Los países miembro de Codex Alimentarius aplican diversas metodologías para el análisis de riesgos en piensos, lo que trae como consecuencia resultados altamente diversos y conlleva a una toma de decisiones contradictorias para el manejo de riesgo, afectando el comercio internacional sin ninguna ventaja para la seguridad del consumidor.

El pienso es la primera parte de la cadena de la alimentación humana a través del mundo. La mayoría de problemas de sanidad de alimentos encontrados encuentran su origen en los materiales de la alimentación/piensos que son comerciados internacionalmente. Además, la atención se debe prestar a los siguientes hechos:

4. La cadena alimenticia es cada vez más compleja;

5. La demanda para el alimento del origen animal está aumentando fuertemente, especialmente de países menos desarrollados; y.

6. El comercio internacional piensos y sus ingredientes representa el volumen de intercambio comercial más grande y global en materia de alimentos, y tiende a seguir creciendo.

Todas las alertas e incidentes de alimentos que ocurren con los productos alimenticios de origen animal, especialmente incluyendo ésos que derivan del pienso, demuestran la necesidad de que los estándares internacionales deben de tener un enfoque comprensivo e integral de toda la cadena.

Después de una consideración exhaustiva y cuidadosa sobre las recomendaciones de la reunión de expertos del FAO/WHO, el E-WG ha identificado aquellas que están dentro del mandato del Codex. Estos problemas, en forma más o menos cercana, tienen que ver con la prevención de la contaminación en la fuente (piensos), antes de su introducción en la cadena alimenticia, y el E-WG cree que estos problemas son los más importantes a ser considerados en el trabajo futuro del Codex sobre alimentación animal. Las áreas prioritarias, identificadas por el E-WG, son como sigue:

Una lista priorizada de peligros.

El E-GW cree que es de suma importancia elaborar una lista de los peligros de importancia internacional (contaminantes presentes/añadidos en ingredientes de los piensos o en los piensos) para seguir las recomendaciones de los expertos de la FAO/WHO Sobre el impacto de la alimentación animal en la seguridad y sanidad de los alimentos. Durante el desarrollo de esta lista es importante considerar las opiniones de los miembros individuales del Codex para asegurarse de que priorización de peligros está en línea con la preocupación debida a las varias condiciones locales y a los problemas que pueden seguir de la contaminación de los piensos o sus ingredientes en el comercio internacional.

El E-WG está completamente enterado que la reunión de expertos mencionada arriba no abordó riesgos microbianos.

Criterios para la identificación de las situaciones de la emergencia

El E-GW reconoce la necesidad de asegurar el intercambio de información durante situaciones de emergencia. El desarrollo de criterios para identificar y para categorizar tales situaciones de emergencia es una condición previa importante para el funcionamiento eficiente de los sistemas ya existentes de intercambio de información, tal como INFOSAN.

[40] FAO/WHO, 2007. *Informe de la reunión de expertos sobre impacto del pienso en seguridad del alimento*. Roma. (Disponible en ftp://ftp.fao.org/docrep/fao/011/a1507s/a1507s00.pdf)

Criterios para la evaluación específica de riesgos basada en ciencia

Contar con criterios científicos específicos para la evaluación de riesgos sería un gran paso adelante ya que permitiría a los países contar con una herramienta valiosa, que les permitiera dar la prioridad a los riesgos basándose en las condiciones locales, usos y costumbres, y exposición de animales, y el impacto resultante, si lo hay, en salud humana.

Textos existentes del Codex, posibles vacíos en lo referente a alimentación animal y su relación con la sanidad de los alimentos

Actualmente existen en Codex guías y directrices relacionadas con la sanidad y seguridad de los alimentos. El E-WG está de acuerdo con la opinión indicada por la reunión de expertos del FAO/WHO que debe ser examinado el alcance y objetivos de los textos existentes en el marco del Codex, entre los textos que podrían estar ligados a los piensos, encontramos, los referentes a principios del análisis del riesgo; intercambio de información referente a situaciones de emergencia y el rechazo de importaciones de alimentos; y Medidas dirigidas a la fuente para reducir la contaminación del alimento con productos químicos.

El E-WG cree que el resaltar los problemas arriba mencionados constituiría un gran avance para el Codex en el área del impacto de la alimentación animal en la seguridad y sanidad de los alimentos, así como un activo valioso en la implantación del Código de Buenas Prácticas en Alimentación Animal[41] .

Propuesta para el alcance y mandato del trabajo futuro en alimentación animal

Los artículos siguientes incluyen las consideraciones y preocupaciones resaltadas por el E-WG que serían de importancia para los trabajos futuros en Alimentación Animal del Codex:

(La lista no se encuentra en orden de prioridades)

1. Examinar los textos existentes del Codex referentes a principios del análisis del riesgo:
    a. Principios de trabajo para el análisis del riesgo para el uso en el marco del Codex Alimentarius[42;]
    b. Aplicación de los principios del análisis del riesgo por el comité del Codex sobre los aditivos alimentarios y el comité del Codex sobre contaminantes de alimentos[43] ;
    c. Aplicación de los principios del análisis de riesgo por el comité del Codex sobre residuos de plaguicidas[44]; y
    d. Aplicación de los principios del análisis del riesgo por el comité del Codex sobre los residuos de drogas veterinarias en alimentos[45] .
    e. Principios y directrices para la conducción del asesoramiento de riesgos microbiológicos[46.]
2. Examinar los textos existentes del Codex para el intercambio de información referente a situaciones de emergencia y el rechazo de alimentos importados:
    a. Principios y directrices del Codex para el intercambio de la información en situaciones de emergencia derivadas de la sanidad de los alimento[47]; y
    b. Directrices para el intercambio de información entre los países involucrados en el rechazo de alimentos importados[48].

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[41] FAO/WHO, 2004. *Código de Prácticas sobre Buena alimentación Animal (CAC/RCP 54-2004).* Rome. (Disponible en http://www.codexalimentarius.net/download/standards/10080/CXP_054s.pdf)

[42] FAO/WHO, 2006. *Principios de aplicación prática para el análisis de riegos aplicables en el marco de Codex Alimentarius.* Manual de Procedimientos de la Comisión del Codex Alimentarius, 17ª. Edición. Rome. (Disponible en ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17s.pdf)

[43] FAO/WHO. 2007. *Principios para el análisis de riegos aplicados el Comité de Codex sobre aditivos alimentarios y y del Comité del Codex sobre contaminantes de los alimentos.* Manual de Procedimientos de la Comisión del Codex Alimentarius, 17ª. Edición. Rome. (Disponible en ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17s.pdf

[44] FAO/WHO. 2007. *Principios para el análisis de riegos aplicados de Codex sobre residuos de plaguicidas*. Manual de Procedimientos de la Comisión del Codex Alimentarius, 17ª. Edición. Rome. (Disponible en ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17s.pdf)

[45] FAO/WHO. 2007. *Principios para el análisis de riegos aplicados de Codex sobre residuos de medicamentos veterinarios en los alimentos* . Manual de Procedimientos de la Comisión del Codex Alimentarius, 17ª. Edición. Rome. (Disponible en ftp://ftp.fao.org/codex/Publications/ProcManuals/Manual_17s.pdf)

[46] FAO/WHO, 2001. *Principios para la Gestión de Riesgos Microbiológicos.* Codex Alimentarius, Rome. (Disponible en http://www.codexalimentarius.net/download/standards/357/CXG_030s.pdf)

[47] *Principios y directrices para el intercambio de información en situaciones de emergencia relacionadas con la inocuidad de los alimentos* (CAC/GL 19-1995) (Disponible en http://www.codexalimentarius.net/download/standards/36/CXG_019s.pdf)

3. Examinar el código de prácticas existente en el Codex dirigido a medidas para reducir la contaminación del alimento con productos químicos, que también abarca la alimentación animal[49] .

   Los textos del Codex mencionados en los puntos 1, 2 y 3 se deben examinar para identificar posibles vacíos referente la sanidad de los piensos y su impacto en la sanidad y seguridad de los alimentos. El resultado de dicho análisis sobre los posibles vacíos existentes, deberá enviarse a la Comisión del Codex para su consideración.

4. Desarrollar guías sobre la aplicación correcta de las metodologías de Codex para el análisis de riesgos derivados de diferentes peligros asociados a los contaminantes que pueden estar presentes en la alimentación animal. Las guías deberán incluir análisis de riesgos basados en ciencia, así como los criterios para su aplicación en contaminantes de piensos. Estos criterios deberán desarrollarse utilizando las metodologías del Codex.

   La directriz debe incluir también la consideración de la necesidad de tratar el establecimiento de índices de la transferencia y de la acumulación de la alimentación animal hacia los tejidos comestibles en productos de origen animal según las características del peligro.

   Las directrices deben permitir a los países priorizar los riesgos basándose en las condiciones locales, el uso, y la exposición de los animales, y su posible impacto en la salud humana.

5. Desarrollar una lista priorizada de los peligros de importancia a nivel internacional presentes en la alimentación animal (contaminantes presentes/añadidos a piensos o sus ingredientes), de modo tal que se faciliten los trabajos futuros.

   Al hacer esto, se debe considerar lo recomendado por la reunión de expertos del FAO/WHO sobre impacto del pienso en seguridad y sanidad de los alimentos. La priorización de peligros debe tomar cuenta la transferencia potencial de contaminantes/residuos de la alimentación a los productos animales comestibles (carne, pescados, leche, huevos).

   La lista incluyendo peligros priorizados se podía remitir al comité del códice sobre los contaminantes en los alimentos para la consideración adicional.

6. Establecer los criterios para la identificación de las situaciones de la emergencia que se notificarán internacionalmente.

   Tales criterios son esenciales para la eficacia en los sistemas ya existentes por los cuales intercambiar la información sobre situaciones de la emergencia de la seguridad del alimento y de la alimentación tales como e.g. INFOSAN que se pudieron ampliar a también cubren la alimentación.

Propuesta para los mecanismos adecuados para que el Codex realice los trabajos futuros en Alimentación Animal

El E-WG ha considerado las maneras más convenientes para que el Codex proceda con los seis puntos arriba mencionados, evaluando las posibilidades de realizarlos en uno o más de los comités existentes dentro del Codex, o bien, mediante un grupo intergubernamental ad hoc sobre la alimentación animal.

Algunos miembros prefieren que el trabajo sea realizado por los comités ya existentes. Otros miembros han precisado que, aunque es posible tratar las preocupaciones relacionadas con los piensos dentro de un número de comités existentes, ninguno de ellos discute rutinariamente estos temas. Por otro lado es necesario resaltar que los expertos en alimentación animal no asisten normalmente a las reuniones de los comités del Codex y por lo tanto los comités pueden no tener suficientes conocimientos en el área de la alimentación animal.

Sin embargo, después de la evaluación cuidadosa a la consideraciones expresadas por varios de los miembros del E-WG, se recomienda que la revisión de los diversos textos del Codex mencionados arriba en los puntos 1, 2 y 3 deben de examinarse a través de los diversos comités del Codex que desarrollaron originalmente estos textos.

Con respecto a un grupo de trabajo especial, no hay una indicación clara ya sea a favor o en contra de su establecimiento. Algunos miembros están contra, algunos están a favor, y otros estarían dispuestos a apoyar su establecimiento sólo si ciertas condiciones son fijadas, por ejemplo, que el alcance sea limitado solamente a algunos problemas claramente delimitados y realizables dentro de los ámbitos del Codex. En conclusión, se recomienda que el trabajo referente a los puntos 4, 5 y 6 se debe realizar por un nuevo grupo de trabajo especial para alimentación animal. Un grupo de trabajo especial, proveería al Codex con los conocimientos necesarios en alimentación animal, así como enfocaría los esfuerzos sobre ciertas actividades y podría asegurar también más consistencia, en términos de contenido y en términos de sincronización.

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[48] *Directrices para el intercambio de información entre países sobre casos de rechazo de alimentos importados* (CAC/GL 25-1997) (Disponible en www.codexalimentarius.net/download/standards/353/CXG_025s.pdf)

[49] FAO/WHO. 2001. *Códicade prácticas sobre medidas aplicables el origin para reducer la contaminación de los alimentos con sustancias químicas* (CAC/RCP 49-2001). Rome. (Disponible en www.codexalimentarius.net/download/standards/373/CXP_049s.pdf

COMMENTS

CANADA

Canada would like to thank Denmark and Mexico for preparing the revised draft of the Working Document. We are pleased to offer the following comments for the Electronic Working Group's consideration:

GENERAL COMMENTS

- Following a review of the comments submitted by the participants, we believe that the draft report identifies the essential elements for potential future work on animal feeding. However, we are of the opinion that some revisions and clarifications to the proposals are necessary to facilitate decision-making at the 32nd CAC and to ensure that a Task Force with a limited lifespan can accomplish the work in a timely manner, should it be decided that such work is to be done in a Task Force.
- We suggest that the section entitled "Proposal for the scope and terms of reference of future work on animal feed" should be re-structured so as to clearly present:
    - a proposed Scope; and,
    - proposed Terms of Reference for future work on animal feeding.
- The proposals presented in the document should be further clarified with the inclusion of potential/anticipated outcomes.
- We are of the view that Proposals 4 and 5 should be emphasized as the key priorities for any future work on animal feeding and it should be clearly indicated that the purpose of proposal 4 if to develop guidelines intended for Governments.

SPECIFIC COMMENTS

Background

- Fifth (5) paragraph on page 1, starting with "Animal feed is the first part of the human food chain….". It is indicated in the second sentence of this paragraph that the majority of food safety problems encountered are in respect to feed. However, information and evidence are not provided in support of this statement and thus, Canada suggests that it be revised as follows:

    "There have been a number of global food safety problems which have occurred as a result of feed contamination events. Furthermore, attention should be paid to the facts that:…."

Proposal for the scope and terms of reference of future work on animal feed

- As indicated above, we suggest that a Scope should be included in this section for consistency with its title and to facilitate the discussion and decision-making at the Commission, and the proposals should be revised to include potential outcomes. Some suggestions are provided below:
- Proposal one (1) on the review of existing texts is an important undertaking and it would be useful to clarify the anticipated outcomes of such a review and identify/propose a suitable mechanism to facilitate it. Hence, we suggest that it may be more effective for a group of experts (including those with feed expertise) to undertake this review (e.g., via an electronic working group), and:
    - Identify gaps (if any) and make recommendations to the relevant committees to facilitate and inform their consideration and review of existing texts, as to whether the risk analysis principles that are used by the Committees (e.g., CCRVDF, CCCF) enable them to consider feed safety issues as they impact food safety,
    - Inform the development of a guidance document intended for Governments on feed safety risk assessment as it impacts on food safety (i.e., Proposal 4) and to ensure that any new guidance is consistent and complementary to existing guidance. In this respect, we note that the texts listed in Proposal one (1) of the Working Document are intended for Codex Committees to guide their work and not for Governments. Thus, in finalizing the Working Document, care should be taken not to confuse guidance and principles that are developed to guide a Codex Committee's work with guidance and principles intended for Member Governments.
    - The Working Principles for Risk Analysis for Food Safety for Application by Governments (CAC/GL 62-2007) should be added to the list of texts to be considered/reviewed.
- Proposals two (2) and three (3): as for proposal one (1), we suggest that it may be more effective to propose a mechanism and outcome, i.e., that a group of experts (including feed experts) or a Task Force (should a decision be made to establish one) undertake a review of those texts in order to identify gaps (if any) and make

recommendations and referrals to the CCFICS and the CCCF to facilitate their review and revision of the texts, as appropriate.

- Proposal four (4): we agree with this proposal but would further recommend that it be revised to indicate that the guidance is intended for governments, as follows:

  "Develop a guideline for Governments on ~~how to apply the existing Codex~~ risk assessment methodologies to evaluate the various types of hazards related to contaminants that can be present in feed ingredients including feed additives used for food producing animals, as they impact food safety. The guideline should include specific science-based risk assessment criteria to apply to feed contaminants. These criteria should be consistent with ~~developed utilizing the~~ ~~established~~ existing Codex methodologies.

  The guideline should also include consideration of the need to address the establishment of rates of transfer and accumulation from feed to edible tissues in animal-derived products according to the characteristics of the hazard.

  The guideline should enable countries to prioritize and assess the risks based upon local conditions, use, and exposure of animals, and the impact, if any, on human health."

- Proposal five (5): we agree with this proposal and suggest that it should be further expanded to indicate that clear criteria should be used to prioritize the list of hazards, as was done by the FAO/WHO expert meeting on Animal Feed Impact on Food Safety;

- Proposal six (6): we believe that WHO/INFOSAN has developed criteria for the identification of food safety emergency situations and suggest that this proposal be referred to the WHO as a recommendation to develop criteria for the identification of feed emergency situations as they impact on food safety.

GERMANY

Text from E-mail:

"…I have no additional comment to the Working document 2.draft. In my opinion this document covers all important issues of the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety.

For future work we could also add the work on sampling and analysis methods.

I hope that all members of the E-WG agree with the conclusion of this Working document. If so, it could be useful to have a concrete proposal for the terms of reference of the Task force in the final version of the document."

NETHERLANDS

Thank you for the second draft on future Codex work on feed. Our sincere apologies for the late response.

We would like to express our appreciation for the work done by Denmark and Mexico on this draft. We consider the work on feed by Codex as very important and we support in general the second draft, which we find gives very good proposals for doing so. We do suggest to include some clarifications, which we specify below.

We would like to emphasize that proposals 1, 2 and 3 (work for Codex Committees) give necessary information for the other proposals and should be conducted before starting the work on 4, 5 and 6.

As regards proposal 4, the current wording of proposal 4 of the second draft proposal may imply that a Task force would define feed risk assessment on a detailed level. We would like to draw your attention to the fact that the current electronic Working group for Revision of the Preamble of the General Standard for Contaminants and Toxins in Foods of the CCCF, mandated by the 31st CAC, will detail provisions for establishing maximum levels for contaminants and toxins in feed, as advice to Codex members. As it is described now, the work under 4 might overlap with the work done on the GSCTF. In our view a Task Force should define general guidelines and a framework for feed risk assessment, whereas the detailed risk assessment should be defined by the Codex Committees which have feed in their Terms of Reference. It might therefore be good to include the identification of existing Codex activities/mechanisms for feed other than the mentioned Codex texts under proposal 1, 2 and 3, to prevent overlap.

Also, we would like to highlight that CCCF (as well as other relevant committees) has a physical working group on priorities for evaluation by JECFA, where members can already include their priority hazards in feed. However, we clearly see the benefit of a Task Force creating a first priority list for hazards in feed to give the work a head start, where after the work could be continued in the priorities working groups in the respective Committees.

We agree with other working group members to specify the Terms of reference and defining the output in the next draft.

Again, our apologies for the late delivery of our response. I hope you will still find this information helpful for the further discussion on future Codex work on feed.

NORWAY

Thank to Denmark and Mexico for the revised proposal which outline the challenge we are faced with respect to feed, in order to improve food safety issues. The background description point out specific areas for further examination which is described more in detail under the proposal for scope and terms of reference.

We apologize for the late answer.

In general Norway support the ideas put forward on future work and would stress the importance on cooperation with other Codex Committees.

Norway prefers that the items 4, 5 and 6 should be carried out by a new Task Force on Animal feed. The Terms of reference in proposal 4 should probably indicate more clear that the guidelines is primarily for governmental use at a national level.

UNITED KINGDOM

Background

At the 31st CAC held in Geneva in June-July 2008, it was agreed to establish an electronic working group (E-WG) to prepare:

1. a~~A~~ proposal for the scope and terms of reference of future work on animal feeding. In doing so the working group should take into consideration the conclusions and recommendations of the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety; and
2. a proposal as to suitable mechanisms for Codex to carry out this work, including, but not limited to, the establishment of an Ad hoc Intergovernmental Task Force.

At the Joint FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety (Rome, Italy, October 2007), it was pointed out that general principles and guidelines for the assessment of risks from feed ingredients or categories of ingredients should be developed. The current Codex Food Safety Risk Assessment methodologies need to be applied and adapted to better address the particular situation of food safety-related feed-safety issues. Different national feed safety assessment methodologies applied by Codex members may lead to highly different risk assessment results and in consequence, to contradictory risk management decisions, which affect international trade without any benefit for consumer safety.

Animal feed is the first part of the human food chain throughout the world. The majority of feed~~ood~~ safety problems encountered are in respect of feed materials that are traded internationally. In addition, attention should be paid to the facts that:

1. The food chain is becoming increasingly complex;
2. The demand for food of animal origin is strongly increasing, especially in less developed countries; and
3. International trade in feedingstuffs is the largest global feed and food commodity trade by volume and it is ~~still~~ expanding.

All the food scares and incidents that occur with food products of animal origin, especially including those deriving from animal feed, demonstrate the need for standards to follow a comprehensive and integrated approach throughout the food chain.

After careful consideration of the recommendations of the FAO/WHO Expert Meeting, the E-WG has identified those that are within the mandate of Codex. These issues, more or less, deal with prevention of contamination at the source (feed), prior to their introduction into the food chain, and the E-WG believes these issues to be of major importance in future Codex work on animal feeding. The areas of priority, as identified by the E-WG, are as follows:

A prioritized list of hazards.

The E-GW believes that it is of major importance to follow the recommendation of the FAO/Expert Meeting on Animal Feed Impact on Food Safety to develop a list of hazards (contaminants in feed ingredients/feed additives) of international relevance that may warrant future attention. In developing such a list it is important to take into account the opinions of the individual Codex members in order to ensure that the prioritization of hazards is developed with due concern to the various local conditions and the problems that may follow from contamination of feed ingredients intended for international trade.

The E-WG is fully aware that the expert meeting mentioned above did not address microbial risks.

Criteria for the identification of emergency situations

The E-GW recognizes the need to ensure exchange of information in emergency situations. The development of criteria to identify and categorize such emergency situations is an important precondition for already existing systems of exchange of information, such as INFOSAN, to function efficiently.

Criteria for specific science-based risk assessment

Establishing specific science-based criteria would be an important step forward as they will be a valuable tool, that will enable countries to prioritize the risks based upon local conditions, use, and exposure of animals, and the resultant impact, if any, on human health.

Existing Codex texts – possible gaps in relation to feed-related food safety issues

Principles and guidelines covering important areas regarding food safety already exist within the Codex framework. The E-WG agrees with the opinion stated by the FAO/WHO Expert Meeting that it should be examined to which extend the existing Codex texts concerning risk analysis principles; exchange of information concerning emergency situations and rejection of imported food; and Source Directed Measures to Reduce Contamination of Food with Chemicals are directly applicable to feed issues.

The E-WG believes that addressing the issues mentioned above would constitute a great step forward for Codex in the area of feed related food safety, as well as a valuable asset in implementing the Code of Practice on Animal Feeding

Proposal for the scope and terms of reference of future work on animal feeding

The items below include the issues that the E-WG believes would be of major importance in ~~of~~ future Codex work on animal feeding:

(The items below are not listed in order of priority)

1. Examine the existing Codex texts concerning risk analysis principles:
   a. Working Principles for Risk Analysis for Application in Framework of the Codex Alimentarius;
   b. The Risk Analysis Principles applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods;
   c. The Risk Analysis Principles applied by the Codex Committee on Pesticide Residues; and
   d. Risk Analysis Principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods.
   e. Principles and Guidelines for the Conduct of Microbiological Risk Aassessment.
2. Examine the existing Codex texts on exchange of information concerning emergency situations and rejection of imported food:
   a. Codex Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations; and
   b. Guidelines for the Exchange of Information between Countries on Rejection of Imported Food.
3. Examine the existing Codex Code of Practice for Source Directed Measures to Reduce Contamination of Food with Chemicals, which also encompasses feed.

The Codex texts mentioned in item 1, 2 and 3 should be examined in order to identify possible gaps in relation to feed-related food safety issues. The outcome of the examination on existing gaps, ~~if any,~~ should be passed on to the Codex Alimentarius Commission for further consideration.

4. Develop guidelines on how to apply the existing Codex risk assessment methodologies to the various types of hazards related to contaminants ~~that can be present~~ in feed ingredients, ~~including~~ and feed additives used in feedingstuffs for food producing animals. The guideline should include specific science-based risk assessment criteria to apply to feed contaminants. These criteria should be developed utilizing ~~the~~ established Codex methodologies.

   The guidelines should also include consideration of the need to address the establishment of rates of transfer and accumulation from feed to edible tissues in animal-derived products according to the characteristics of the hazard.

   The guidelines should be drawn up in such a way as to enable countries to prioritize the risks based upon local conditions, use, exposure of animals and the impact, if any, on human health.

5. Develop a prioritized list of hazards (contaminants in feed ingredients ~~including~~ and feed additives) of international relevance that may warrant future attention.

   In doing so, due consideration should be given to the prioritized list of hazards as recommended by the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety. The prioritization of hazards should take

account of the potential transfer of contaminants/residues ~~from~~ in feed to edible animal products (e.g. meat, fish, milk, and eggs).

The list including hazards of high priority could be forwarded to the Codex Committee on Contaminants in Foods for further consideration.

6. Establish criteria for the global identification and notification of emergency situations affecting the feed sector (and ultimately the food sector). ~~To be notified internationally.~~ Such criteria are essential for the ~~efficacy in already~~ efficient operation of existing systems ~~by which to~~ regarding the exchange of information about food ~~and feed~~ safety ~~emergency situations such as~~ (e.g. INFOSAN) that might be expanded to ~~also~~ cover feed.

Proposal as to suitable mechanisms for Codex to carry out this work

The E-WG has considered suitable ways for Codex to proceed with the six issues above, either in an ad hoc intergovernmental Task Force on Animal Feeding, or in one or more of the existing Codex Committees. ~~or in an ad hoc Intergovernmental Task Force on Animal Feeding.~~

Some members prefer that the work should be carried out by ~~the already~~ existing Codex Committees. Other members have pointed out that, although it is possible to address animal feeding issues within a number of the existing Codex committees, none of the committees routinely discuss animal feed issues. Feed experts do not normally attend meetings ~~in the~~ of these Codex ~~C~~committees and consequently the committees ~~may~~ do not have ~~sufficient~~ relevant expertise in the feed area.

However, after giving thorough consideration to the comments from the various members of the E-WG, it is recommended that the examination of the different Codex texts mentioned in item 1, 2 and 3 above should be dealt with by the different Codex Committees that originally developed these texts.

With regard to a Task Force, there is no clear ~~indication~~ consensus for or against. Some members are against, some are for, and others are ~~partly for~~ in favour of a Task Force if certain conditions are met, e.g. where ~~that~~ the scope is limited to only a few issues appropriate and achievable within the life of a ~~by a~~ future Codex Task Force on Feed. In conclusion, it is recommended that the work concerning items 4, 5 and 6 should be carried out by a new Task Force on Animal Feed. A dedicated Task Force could provide Codex with the necessary expertise on feed, and grouping related identified activities about animal feeding may be more effective and may ensure also ~~more~~ greater consistency, both in terms of content and in terms of timing.

UNITED STATES OF AMERICA

On behalf of the government of the United States, the U.S. delegate to the Electronic Working Group on Animal Feeding submits these comments on the revised draft proposal (Working document2.doc) for scope and terms of reference of future work on animal feeding by the Codex Alimentarius Commission (Codex). The U.S. delegate appreciates the efforts of the Co-Chairs in preparing the draft proposal.

General Comments

1. The current draft is significantly improved and more focused than the original draft.
2. We have reviewed the comments submitted by the participants of the EWG and believe the draft report accurately captures the comments and identifies potential future work on animal feed. However, we still remain concerned whether the proposed work could be accomplished within the limited lifespan of a Task Force and believe additional clarification is needed to assist the 32nd CAC with a decision regarding the need for a Task Force.
3. To facilitate the decision of the 32nd CAC we suggest that the next draft contain:
   - the proposed Scope of Work and proposed Terms of Reference for the future work of a Task Force on animal feeding;
   - a separate section in the document that addresses the expected output and outcome from each term of reference;
   - a statement indicating by whom the output of the work is expected to be implemented (animal producers, animal feeders, governments, international organizations, etc.). We believe this is particularly important since tasks 1, 2, and 3 are work directed to Codex committees and could result in changes in the scope of work for these committees, tasks 4 and 5 are directed at governments, and potentially producers and feeders of animals, and task 6 is directed toward WHO/FAO and governmental bodies. Without a clear indication of who will be responsible for implementing the output, the work of the Task Force and output could become unfocused because it would try to address too many different groups.

Specific Comments

Background

- Beginning with the fifth paragraph on page 1 starting with "Animal feed is the first part of the human…." and ending at the end of the sixth paragraph with "comprehensive and integrated approach throughout the food chain." Information supporting the statements in these paragraphs is not provided and the paragraphs are very similar. We suggest revising and combining the paragraphs as follows:

  "Throughout the world in every society, animal feed is the first part of the human food chain and important to the safety of food of animal origin. There have been a number of food safety problems that have involved feed contamination. It is therefore important that feed and feed ingredients be included in a comprehensive and integrated approach to food safety." It is important to note that:

  1. The food chain is becoming increasingly complex;
  2. The demand for food of animal origin is strongly increasing, especially in less developed countries; and
  3. International trade in feeding stuffs is the largest global feed and food commodity trade by volume and is still expanding.

Proposal for the scope and terms of reference of future work on animal feeding.

- The USG supports the work outlined under items 1, 2 and 3 and agrees that this work should be carried out by the existing committees and prior to the work outlined in items 4, 5, and 6. If gaps relating to feedingstuffs are identified this information should be shared with the Codex Commission for further consideration.
- During the reviews discussed above we urge members to have a feed expert attend existing committee meetings and where this is not possible for delegates to meet with their national feed experts prior to existing committee meetings.
- The USG supports the work outlined in 4 and 5 provided the issues we have raised under points 2 and 3 under general comments are addressed.
- For item 5 under the scope of terms of reference, we suggest revising the first sentence in 5 to read "Develop a prioritized list of hazards ~~(contaminants~~ in feed ingredients including additives of international relevance and that are reasonably likely to occur and that may warrant future attention." We suggest deleting "contaminants" because there are hazards in feeds other than contaminants that can cause problems. We have added "reasonably likely to occur" to assist in focusing the list of hazards on those that are likely to occur rather than on those that might occur.
- For item 5 under the scope of terms of reference we suggest revising the last sentence in 5 to read "The list including hazards of high priority could be forwarded to the appropriate Codex Committee for ~~on Contaminants in Foods for~~ further consideration." We suggest this revision because there are more Codex committees that deal with potential hazards in food then just the Committee on Contaminants in Food.
- In our initial comments we supported item 6 as being potential work for a Task Force. After further discussion we believe the work could better be carried out by WHO and FAO. We still support the need for criteria, but we raise the question of whether Codex is the appropriate body to establish these criteria.

As a member of the EWG, I again express the appreciation of the United States to Denmark and Mexico as the Co-Chairs for their work in preparing this draft. I am pleased to provide any further information that you may require.

EUROPEAN COMMUNITY

Text from E-mail: "…The comments expressed in this document do not prejudice the coordinated position officially and finally taken by the European Community when requested by the Codex Secretariat…"

Comments of the Delegate of the European Commission in response to the second draft proposal for scope and terms of reference of future work on animal feeding submitted by the Chair to the electronic Working Group established by the Codex Alimentarius Commission in 2008.

The comments expressed in this document do not prejudice the coordinated position officially and finally taken by the European Community when requested by the Codex Secretariat.

The accomplishments of the Chair of the electronic Working Group as synthesized in the much improved second draft, the clearer description of the tasks enumerated, their better alignment with existing Codex documents and structures and the proposals regarding the suitable mechanisms to carry out the activities identified are very much appreciated.

Many of the comments submitted seem to concur to support those recommendations from the FAO/WHO Expert Meeting on Animal Feed Impact on Food Safety (Rome, October 2007) which fall within the remit of the scope of Codex and therefore those represent a core to pursue future activities in Codex.

Activities proposed and mechanism to achieve them

The six activities enumerated in the proposal seem to be best undertaken by concentrating the existing expertise (of the Member States and the stakeholders) in specific meetings on animal feeding. It seems much more slow, costly and inefficient when related activities are spread among existing Codex Committees requiring the available experts to contribute to this work when the agendas and working programs of the relevant committees allow for it. Besides, contributing to these activities through this latter manner means usually for animal feeding experts to attend more meetings, as usually it is less efficient to contribute effectively at several day meetings with long agendas just for a discussion on one single point, taking into account that the meetings may likely be unconnected. This may represent an additional hindrance in advancing in those identified activities if carried out that way.

The previous experience of the development of the Code of Good Animal Feeding seems to point that work such as that can be achieved very well using specific meetings.

Additional remarks

It might be appropriate to reflect in the paper from the group the different positions expressed and reflect the reasoning for them. The physical limitations of an electronic Working Group may prevent reaching a consensus proposal.

Specific wording comments

In addition to the above mentioned comments I would like to offer the following wording comments:

Proposal for alternate wording of area of activity "criteria for the identification of emergency situations" in the background:

The e-WG recognizes the need to ensure exchange of relevant and accurate information in emergency situations. The development of criteria to identify and categorize when to transmit this data and the data itself to be transmitted about such emergency situations is an important precondition for any systems of exchange of information to function efficiently.

Corresponding wording of proposal of activity number 6:

Establish criteria to identify and categorize when to transmit information about emergency situations and the nature of the data itself. Such criteria are essential for the efficacy of systems of exchange of information. The experience of INFOSAN and other systems should be considered.

INTERNATIONAL FEED INDUSTRY FEDERATION (IFIF)

IFIF appreciates the opportunity to respond to the Codex Electronic Working Group's second draft of Terms of Reference (TORs) for possible future work. Within the 'Background' section we would like to make two observations:

1) Paragraph 5 (page 1): “Animal feed …”. IFIF would caution against suggesting the majority of food safety problems relate to internationally-traded feed ingredients. They may be identified more readily when moved into international trade, but most are contaminated locally through poor storage, poor handling and/or deliberate adulteration and used locally prior to entering the feed industry at international level.

2) Paragraph 9 (page 1): “All the food scares and incidents …”. IFIF would like to see this statement modified to demonstrate the need to actively counter miss-selling and fraud through greater standardisation and integration of existing control systems throughout the food chain.

Within the 'Proposal for the scope and terms of reference of future work on animal feeding' we would like to make the following recommendations for inclusion:

1) TORs 1-3: “To examine existing Codex texts …”.

Our industry agrees with all three proposals but would like to see the words “with regard to their relevance to animal feeding:” included at the end of each introductory sentence rather than separately at the end to emphasis their aim and objective.

This work could be undertaken by a new Task Force on Animal Feed or through either existing Codex Committees or a specifically-convened expert group qualified to make an assessment and to bring forward a report for the Commission to consider concurrently to the work of the new Task Force on Animal Feed.

2) TOR 4: “Develop a guideline …”.

IFIF is in full support of this TOR, but would like to ensure its practical application by adding an additional paragraph: “The guideline should outline how to apply existing Codex Risk Assessment Guidelines to animal feeding.”

3) TOR 5: “Develop a prioritized list of hazards …”.

IFIF supports this TOR and offers assistance in disseminating this information to industry.

4) TOR 6: “Establish criteria for the identification of emergency situations …”.

IFIF would suggest that an additional first step be developed in the identification process whereby “emerging feed safety risks” can be identified and action taken before they develop into “emergency situations”. Therefore, we recommend altering the first sentence to read: “Establish criteria for the identification of emerging feed safety risks prior to them developing into emergency situations to be notified internationally.”

Within the 'Proposal as to suitable mechanisms for Codex to carry out this work', IFIF would like to express its support for the EWG's draft findings and recommendations.

WORLD RENDERERS ORGANISATION (WRO)

The WRO have considered the topics proposed for discussion by are convened task force and consider them to be of interest.

Guidelines for the application of risk assessment to feeds would be helpful. Risk assessment of hazards to human health which may arise from feed or feed ingredients has been difficult if not impossible. This is because of the lack of knowledge about how hazards may make their way from feed ingredients to feed to animals and finally to people. A Task Force is not likely to fill in the knowledge gaps but some guidelines about how to relate hazards in feed to the risk of hazards to people could help in making slightly more objective risk assessment of hazards in feed.

Development of a prioritized list of hazards sounds like a difficult task but if the list is genuinely scientifically based it should help to focus on what are the major feed issues related to human food safety.

Notification of emergency situations related to feed should be a more straightforward task. Notification systems for food exist and presumably the Task Force would define the criteria for linking feed emergencies to the food notification systems.

As a result of these considerations, the WRO can support the proposals from the E-WG on animal feeding.