

EU Legislation on Animal Feed and Safety of Animal Products

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What is safe feed?

Safe for humans consuming livestock products

Safe for the animals

Safe for the environment

... BSE, dioxins, nitrofen, mycotoxins, heavy metals, salmonella, pharmaceutical waste,...

What lessons have been learnt from the food scares?

What are the causes of Food & Feed to be unsafe?

■ **Ignorance**

- Not aware of the hazards

■ **Incompetence**

- Ineffective control systems and procedures

■ **Irresponsible acts**

- Intentional breaches of good practice

■ **Illegal acts**

- Breach of statutory regulations knowingly or otherwise

Principles of the new structure

- Integrated feed & food legislation
- Full recast of the feed legislation
- All texts undergo co-decision procedure (i.e. Council and European Parliament)
- Directly applicable Regulations rather than Directives
- Recast started in 2000 and completed by 2007

EU feed legislation: new structure

General food law Regulation
178/2002

Feed Hygiene Reg.
(next to Food hygiene)

Feed & food official controls

GM feed&food Reg.
1829/2003

Undesirable Directive
2002/32

Medicated feed Directive
90/167

Feed Additives Reg.
1831/2003

Marketing of feed

Animal by-products Reg.
1774/2002

BSE Reg.
999/2001

Principles of the adaptation of the EU feed legislation

- General principles of EU food law (Regulation 178/2002)
 - “Feed is for Food”
 - Responsibility for the safety of food & feed products rests with operators (feed or food business operators)
 - Traceability systems together with recall procedures and notification to public authorities
 - Date of Application: **1.1.2005**

Definition of feed business (Reg. (EC) n°178/2002)

- « **Feed** » (or « **feedingstuffs** ») means any substance or product, including additives, whether processed, partially processed or unprocessed, intended to be used for oral feeding to animals;
- « **Feed business** » means any undertaking, whether for profit or not and whether public or private, carrying out any operation of production, manufacture, processing, storage, transport or distribution of feed, including any producer producing, processing or storing feed for feeding to animals on his own holding;
- « **Feed business operator** » means the natural or legal persons responsible for ensuring that the requirements of food law are met within the feed business under their control.

Harmonisation

- Harmonisation of codes of good practices

Currently a plethora of codes & schemes by feed manufacturers, feed material suppliers, retailers, processors, livestock groups
→ increased complexity and cost

- Legislation

- Feed Hygiene Regulation EC183/2005

Note: The credibility of the Feed Hygiene Regulation depends on the EU authorities insistence on the implementation of equivalent measures in Third Country feed & food establishments exporting livestock products to the EU

- Codex Alimentarius –

Code of Practice on Good Animal Feeding

**Feed Hygiene Regulation
and
Industrial Codes of Practice**

EU 'Regulation laying down requirements for Feed Hygiene'

- Implementation 1st January 2006
- Many features included in earlier legislation
- Objective is protection of human health, animal health, animal welfare and the environment, and to ensure full traceability of feed

1. Scope

- Applies to all feed business operators from primary production to placing of the feed on the market
- It also applies to the feeding of food producing animals and to imports of feed and feed materials from third countries

2. Obligations - general

- Feed business operators shall ensure that all stages of production, processing and distribution shall be carried out in a hygienic way.
- When feeding food producing animals the risk of biological, chemical & physical contamination of feed, animals & animal products is minimised.

2a. Requirements of feed businesses at the level of primary production

- These follow those of the Codex 'Code of Practice for Good Animal Feeding'
- GAP should be applied during all stages of on-farm production of feed for food producing animals

Requirements of feed businesses at the level of primary production (Cont'd)

- 3 types of contamination hazards are identified:
 - biological, such as bacteria, fungi, etc.
 - chemical, e.g. medicine, pesticides, etc
 - physical, such as broken needles, etc.
- Additionally:
 - (a) National or Community programmes for animal health surveillance and reduction of zoonotic pathogens must be followed

(b) Guides to good practice must be followed to control hazards. These should cover:

- (1) the control of environmental contamination in such forms as mycotoxins, heavy metals, radio-active material, etc.
- (2) the use of water, organic waste & fertilizers
- (3) the correct and appropriate use of pesticides and their traceability
- (4) the preparation, storage & traceability of feed ingredients
- (5) the proper disposal of dead animals, waste and litter

- (6) procedures, practices and methods to ensure that feed is produced, prepared, packed, stored and transported under appropriate hygienic conditions, including effective cleaning and pest control.
- (7) the record keeping
- (8) information on hazards, including protective measures, to prevent disease & to ensure hygienic conditions of feed production

2b. Requirements for feed businesses other than at the level of primary production

- These follow the Codex 'Code of Practice for Good Animal Feeding'
- Additionally:
 - (a) An organisation chart must be drawn up
 - (b) A more detailed quality control programme must be followed
 - (c) All complaints must be recorded
 - (d) HACCP principles must be applied to all procedures

Good animal feeding

- This section follows the Codex 'Code of Practice for Good Animal Feeding' which states

Good Animal Feeding Practice

- This should ensure proper use of the feed whilst minimising biological, chemical and physical risk to consumers
- Water should be of suitable quality
- Grazing should minimise the risk of contamination of food
- Where agri-chemicals are used, withholding periods should be observed

Good animal feeding practice (Cont'd)

- The correct feed should be given to the correct animals
- Contamination should be minimised during feeding
- Animals receiving medicated feed should be identified and withholding periods observed
- Vehicles and equipment should be cleaned after being used for medicated feed

2d. Other obligations of all feed business operations

- (a) to comply with microbiological criteria
- (b) to take measures and adopt procedures to comply with the Regulation
- (c) they may use Guides to comply with the Regulation

4. Official control, registration and approval

- Feed businesses must be registered if they are making and marketing additives, proteins derived from bacteria, yeast, etc, amino acids and co-products and hydroxy analogues of amino acids, or premixtures containing antibiotics, coccidiostats, etc. growth promoters, Vitamins A & D, copper or selenium, or compound feeds containing antibiotics, coccidiostats, etc. or growth promoters.
- All other feed businesses must be registered.

5. Guides to Good Practice

- Member States must encourage the development of Guides to Good Practice, whose use by feed businesses is encouraged but voluntary.
- These Guides may be developed by industry but must be assessed by the authorities. Copies must be forwarded to the Commission.
- Community-wide Guides may be developed (FEFAC).
- These Guides must have regard to Codex Codes of Practice.

6. Imports

Imports of feed, feed materials or additives can only be made from third countries if:

- (a) the third country and the establishment of dispatch is on a list of those countries from which feed imports are permitted
- (b) The feed was obtained or prepared in:
 - (i) the establishment of dispatch
 - (ii) another establishment on the list
 - (iii) the feed satisfies this Regulation & other Community feed hygiene rules

Financial Guarantees

- To cover cost of withdrawal, treatment and/or disposal of faulty feed or food

(This section has not yet been brought into operation)

GM feed & food Regulation 1829/2003

- Principles
 - Authorisation procedure for all GM feed & food (including certain feed additives)
 - Labelling of feed materials and compound feed containing GM feed materials
 - Threshold of 0.9% for labelling
 - No labelling of animal products from animals fed on GM feed
 - Notification of « existing products » before 18 October 2004
 - Publication of a register of authorised GM feed&food in April 2005
- Published on 18.10.2003
- Application from **18.04.2004**

Feed labelling - New GM labelling rules

Problems:

- Scope: which additives are falling under Regulation 1829/2003
- Analytical problems: absence of analytical means

Undesirable substances Directive

- Principles
 - Ban on dilution
 - Extension to feed additives
 - Extension of the list of contaminants
 - PCB-like dioxins by the end of 2004
 - New pesticides (2005)
 - New mycotoxins (2006)
 - Medicinal substances and coccidiostats in feed for non target species (2005)
- Adopted in August 2002
- Entry into force on 1 August 2003

Feed additives Regulation 1831/2003

- Principles
 - Replaces Directive 70/524
 - Includes amino acids and silage agents
 - Brand specific approval for coccidiostats
 - Withdrawal of antibiotics growth promoters by 1.1.2006
 - Notification of existing feed additives by 7 November 2004
 - Re-evaluation of all feed additives every 10 years
- Adopted in October 2003
- Came into force on 18 October 2004

Issue of orphan additives

- Background
 - Some generic feed additives may be lost overnight if no producing company is willing to bear the re-evaluation costs
- Solution
 - Co-operation with producers of feed additives to coordinate the notification process and re-evaluation
 - Establishment of a list of candidate « orphan additives » by FEFAC

Industry's response to feed/food scares

- Since the advent of BSE, the compound feed industry has taken a much stronger view as to how animal feed fits into the food chain
- This has resulted in the industry in individual Member States developing Codes of Practice to improve and as far as possible ensuring feed safety
- Most problems have originated in feed materials, often due to fraud
- Compounders & feed material suppliers working together
- European-wide Codes now being developed in conjunction with the Commission
- Independent audit is essential

Conclusions

- ❖ Feed safety problems have occurred
- ❖ On occasions danger is exaggerated by the media
- ❖ Most of the problems have originated in feed materials
- ❖ Industry and authorities have responded
- ❖ Animal feed in the EU is safer than it has ever been
- ❖ **Safe** feed means **safe** animal products