

RESPONSE OF THE FEED INDUSTRY ON THE REQUIREMENTS OF SAFE FEED AND FOOD PRODUCTION IN EUROPE

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The new General Food Law of the European Union is in place since 1 January 2004. In the framework of this GFL the European Parliament adapted the Feed and Food Hygiene Regulation coming in place from 1 January 2006 onwards. Responsibility for food safety for all partner in the feed and food chain is the bases of this regulation. All operations should apply the HACCP principles to define . Transparency and traceability are required to inform the competent authorities about the product streams.

Above all, traceability in the feed chain is FEFAC's aim to ensure the safety of feeds for the benefit of consumers (of products of animal origin), animals and the environment.

The key to success: a feed legislation embracing the overall feed chain

The General Food Law Regulation (EC) No 178/200 together with the regulations on Feed Hygiene and the regulation on Feed and Food official controls are the main pillars for developing a feed legislation embracing the overall feed (and food) chain and ensuring adequate traceability systems to ensure feed safety. The General Food Law Regulation mirrors the farm to table approach ("feed is for food") and manifests that the responsibility for the safety of food & feed products rests with feed and/or food business operators. Furthermore, it establishes traceability systems to be in place from 1 January 2006 on, recall procedures and notification to public authorities.

In the General Food law, traceability "means the ability to trace and follow a food, feed, food-producing animal or substance intended to be, or expected to be incorporated into a food or feed, through all stages of production, processing and distribution" (Art. 3).

In the daily feed industry quality management, traceability plays an essential role and is realised via record keeping i.e. documentation and registration. For more than 15 years, EU feed compounders have developed individual traceability systems in accordance with the requirements of international quality assurance standards such as ISO 9000.

A clear example of the complexity of traceability in the food to feed chain is demonstrated by the medroxyprogesteronacetat (MPA) affaire in 2002 in Belgium and the Netherlands.

The EU-Directive on the approval and registration of feed establishment (Directive 95/69/EC) already includes provisions regarding traceability. The new legal framework mirroring the “stable to table” approach intends to further develop the traceability systems in the feed chain with a view to embracing all operators in the chain. From a professional angle, traceability is the backbone of codes of good practice and also subject to FEFAC harmonising efforts to ensure the most efficient and transparent quality assurance system.

The Implementation of traceability is defined as follows: “2. (Food and) feed business operators shall be able to identify any person from whom they have been supplied with [...] a feed or any substance intended to be, or expected to be, incorporated into a [...] feed. 3. (Food and) feed business operators shall have in place systems and procedures to identify the other businesses to which their products have been supplied” (Art. 18). In other words, the scope of traceability is meant to cover one step back, one step forward.

The new proposal on Feed hygiene, adopted in April 2003, now represents the “missing link” for a feed legislation covering the whole feed chain, replacing Directive 95/69/EC on the approval of feed establishments and laying down, a.o. the general legal framework on traceability in the feed chain. The proposal mainly mirrors the food hygiene proposal and applies to the production of feed at all stages, including primary production.

Feed business operators - other than primary producers - have to implement an HACCP system to ensure feed safety and operators must respect the hygiene requirements defined in the Annexes to the Regulation.

Furthermore, mandatory registration of all feed businesses (primary producers, feed material suppliers (incl. food businesses), traders, compound feed manufacturers, livestock holders) is requested by competent authorities. In contrast to the food hygiene proposal, also a financial guarantee is foreseen to cover the costs of risks linked to feed business operations. The development of voluntary codes of practices both nationally and at EU level is encouraged, which may be subject to standardisation.

Once adopted, the new feed hygiene Regulation will then become the future legal reference of the FEFAC Action plan for feed safety.

FEFAC response: The development of a European Quality Assurance Programme for animal feed

Several years ago, fefac decided to establish an action plan to develop a european quality assurance programme for animal feed. The aim was and is to evaluate and harmonise existing national quality assurance systems and to support the development of this sytems in other eu-countries.

In 1998, FEFAC drew up the first **FEFAC guidelines** for the implementation of national codes of practices for manufacturing of compound feed. They contain a set of principles covering the sourcing of quality feed materials, production, storage, transport and delivery of quality feed as well as the use of additives and veterinary medicinal substances in feed. One main requirement is also the record keeping ensuring an adequate traceability system.

In April 2001, the FEFAC guidelines were reviewed and the undertaking of a risk analysis based on HACCP principles, an authorisation procedure for the purchase of feed materials and a contingency procedure in case of contamination were introduced as new requirements to ensure feed safety. So far, eight National Codes of compound feed manufacturing practice have been developed along the FEFAC guidelines in the Netherlands, Belgium, the United Kingdom, Italy, Portugal, France and Germany. Other codes are currently under development in Sweden, Ireland and Austria.

The HACCP module in the Assurance System forces the individual feed companies to discovery and register the critical control points in there production process and to monitor the process on critical risk factors.

For this reason f.i. in the Dutch Good Manufacturing Practice System (GMP+) regular monitoring does take place on Salmonella incidence. The results of this monitoring in animal feed is presented in table 1.

Table 1. Monitoring of Salmonella incidence in animal feed in 2003 and 2004

<i>Feed</i>	<u>2003</u>		<u>2004</u>	
	<i>N</i>	<i>% pos.</i>	<i>N</i>	<i>% pos.</i>
Cattle	1375	0.7	2188	0.4
Pigs	2857	0.8	3048	0.6
Poultry				
Breeding	413	0.0	298	0.0
Multipliers	916	0,5	789	0,5
Broilers	1818	0.4	2753	0.3
Laying hens	2262	0.4	3037	1.0
Turkeys	324	0.0	145	0.7
Feed Ingredients	14903	3.6	19361	4.7

Salmonella typing from the positive samples in 2004 resulted in the following findings:

Poultry: 8x Senftenberg; 8x Agona*; 6x Mbandaka; 3x Virchov*; 2x Lexington; 2x Infantis*; 2x Java; 1x Enteritidis; 1x Montevideo; 1x Panama; 1x Yoruba

Cattle: 2x Tennessee; 2x Lexington; 1x Montevideo; 1x Mbandaka; 1x Havanna:

Pigs: 3x Wortinton; 3x Agona*; 2x Montevideo; 2x Typhimurium* ; 1x Senftenberg; 1x Mbandaka ; 1x Minnesota; 1x Livingstone; 1x Kentucky ; 1x Llandoff

The * marked Salmonella types are considered by the EU as risk factor for human health

Stepwise development of the European Feed Manufacturers Code

In 2002, the FEFAC guidelines have been further developed towards a «FEFAC benchmark standard». This document has been used to perform an independent benchmarking of each existing national Code of Good Practices for feed manufacturing with the aim to get an overview of the status of European Quality Assurance in the compound feed sector, with a view to facilitate mutual recognition and convergence of national schemes. One main pillar of the benchmarking study was the demand for a full traceability system including a detailed record keeping procedure as a Quality management requirement. The benchmarking study was carried out by the independent certification body SGS at the end of 2002 and its results presented in February 2003. The outcome of the benchmarking study showed that there were too many codes and too many certification systems, little consistency and limited mutual recognition between schemes. Therefore, in order to reach more convergence of national codes of practice for compound feed manufacturing and to reach out to the whole supply chain, FEFAC has started the second stage of its Benchmarking project.

The second step of the FEFAC Benchmarking project embraces two objectives.

First priority was to establish a European Feed Manufacturers Code(EFMC), which covers all feed safety issues and also aims at harmonisation of independent (accredited) certification processes inside the feed production plants. However, national Codes will continue to exist to address specific national quality requirements or contractual provisions. The finalisation of the EFMC including an International Feed Material Standard (see B) did take place in September 2004 and was aofficially approved by the FEFAC Council in October 2004. The next step is to implement the EFMC in the national codes. This has to be finished by the end of 2005 by independent approval of the national code. FEFAC did present the EFMC to the European Commission for endorsement in the scope of art. 22a of the Feed Hygiene Regulations.

Second part of the benchmarking project is the parallel development of an International Feed Ingredient Standard together with International Rules of Certification. This development does take place in the International Feed Safety Alliance (IFSA) where FEFAC cooperates with 4 standard owners for feed ingredients. The aim is to develop a basic harmonised core standard for feed materials and feed additives, which then could be completed step by step through sector notes with specific criteria for products and product categories. The final draft for the IFSA- Feed Ingredient Standard and the IFSA- Rules of Certification will be finished on 1 September 2005 and presented to the national, European and International supplier organisations and companies.

Conclusion: Safety in the feed chain - increasing operators' awareness and responsibilities

Feed safety is an essential part of food safety. Feed and food business operators have to recognise their shared responsibility and overcome mistrust among partners in the chain. In the feed sector, there is an ongoing implementation of codes of practice but still a lack of harmonisation. Therefore, FEFAC did develop the European Feed Manufacturers Code connected to the International Feed Ingredient Standard to ensure an increased level of feed safety in the compound feed industry in Europe in an harmonised way. This standards will contribute to avoid feed related health risks to a minimum and to an effective risk management in case of an feed related incident.