



# **Feed production from EU perspective**

## **Legislation and trends**

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**Žitna konferenca  
Ljubljana, 13 november 2013**





# FEFAC in a nutshell

- Created in 1959 – 50th Anniversary in 2009
- Represents industrial compound feed and premixtures manufacturers
- 29 Members:
  - 23 Member Associations from 22 EU Member States
  - 3 Observer Members (Turkey, Serbia, Russia)
  - 3 Associate Members (Switzerland, Norway, EMFEMA)
- 153 mio. t of industrial compound feed in EU-28 in 2012
- 7 Technical Committees to assist the FEFAC Council
  - Animal Nutrition
  - Industrial Compound Feed Production
  - Premix & Mineral Feed
  - European Feed Manufacturers Guide (EFMC)
  - Fish Feed
  - Milk Replacers
  - Sustainability



# FEFAC Membership 2013

## Active Members

VFÖ	Austria	1995 (1964)
APFACA/BEMEFA	Belgium	1959
BFMA	Bulgaria	2013
CFIA	Croatia	2013 (2008)
CFA	Cyprus	2004 (2003)
CMSOZZN	Czech Republic	2004 (2000)
DAKOFO	Denmark	1973
FFDIF	Finland	1995 (1993)
SNIA	France	1959
DVT	Germany	1959
HGFA	Hungary	2012
ASSALZOO	Italy	1959
IGFA	Ireland	1973
LGPA	Lithuania	2005
NEVEDI	The Netherlands	1959
IZP	Poland	2004 (2001)
IACA	Portugal	1986 (1976)
APFWTC	Slovakia	2004 (2003)
GZS	Slovenia	2004
CESFAC	Spain	1986
FS	Sweden	1995
LANTMÄNNEN	Sweden	1995
AIC	United Kingdom	1973

[observer as from ...]

## Observer Members

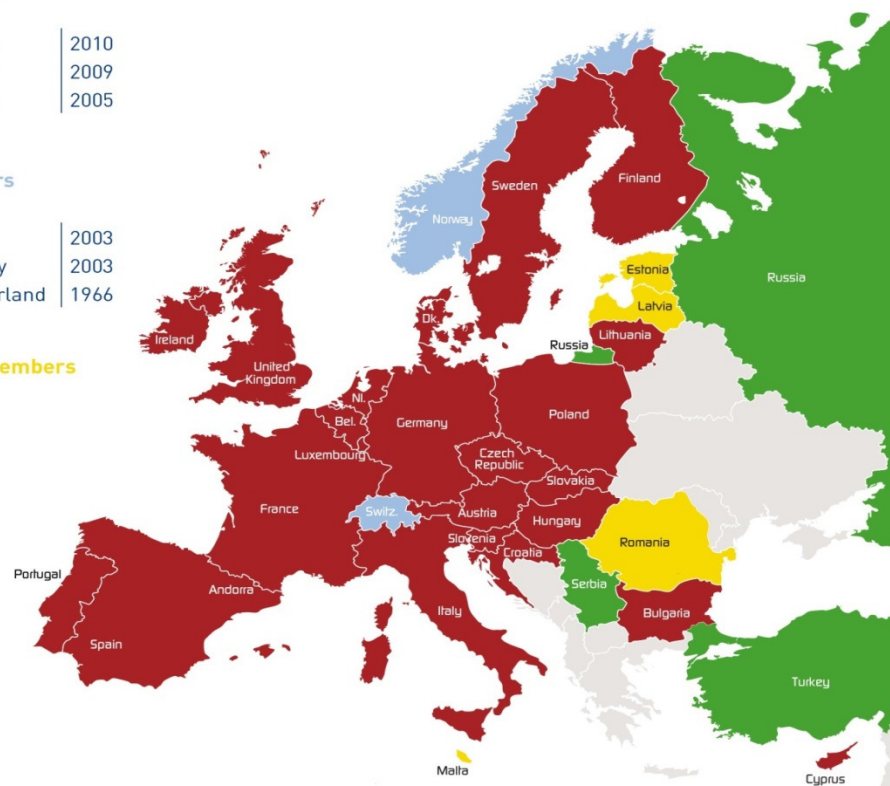
RUFM	Russia	2010
SFMA	Serbia	2009
TURKIYEM	Turkey	2005

## Associate Members

EMFEMA		2003
FHL	Norway	2003
VSF	Switzerland	1966

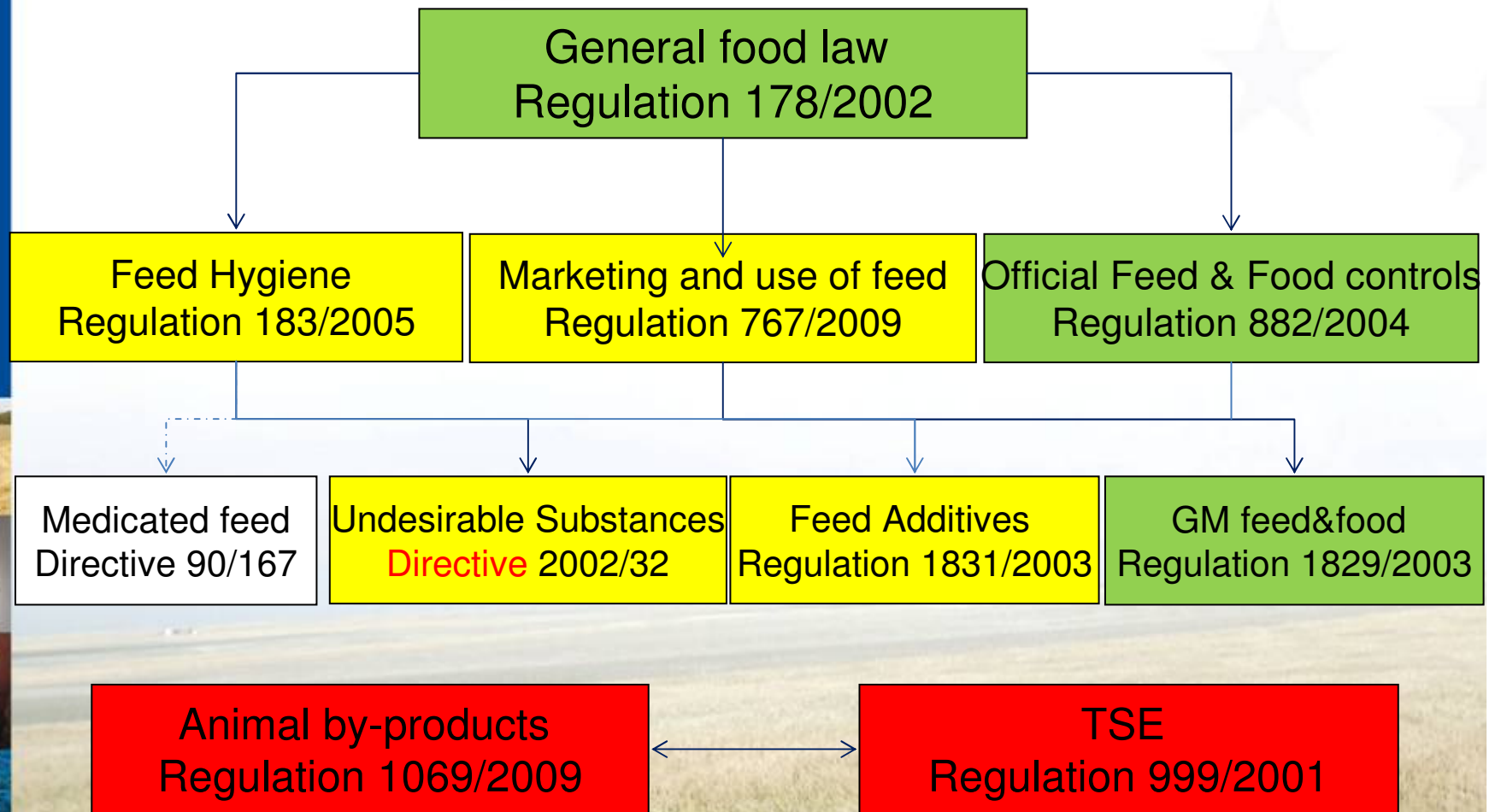
## Potential Active Members

Estonia
Latvia
Malta
Romania

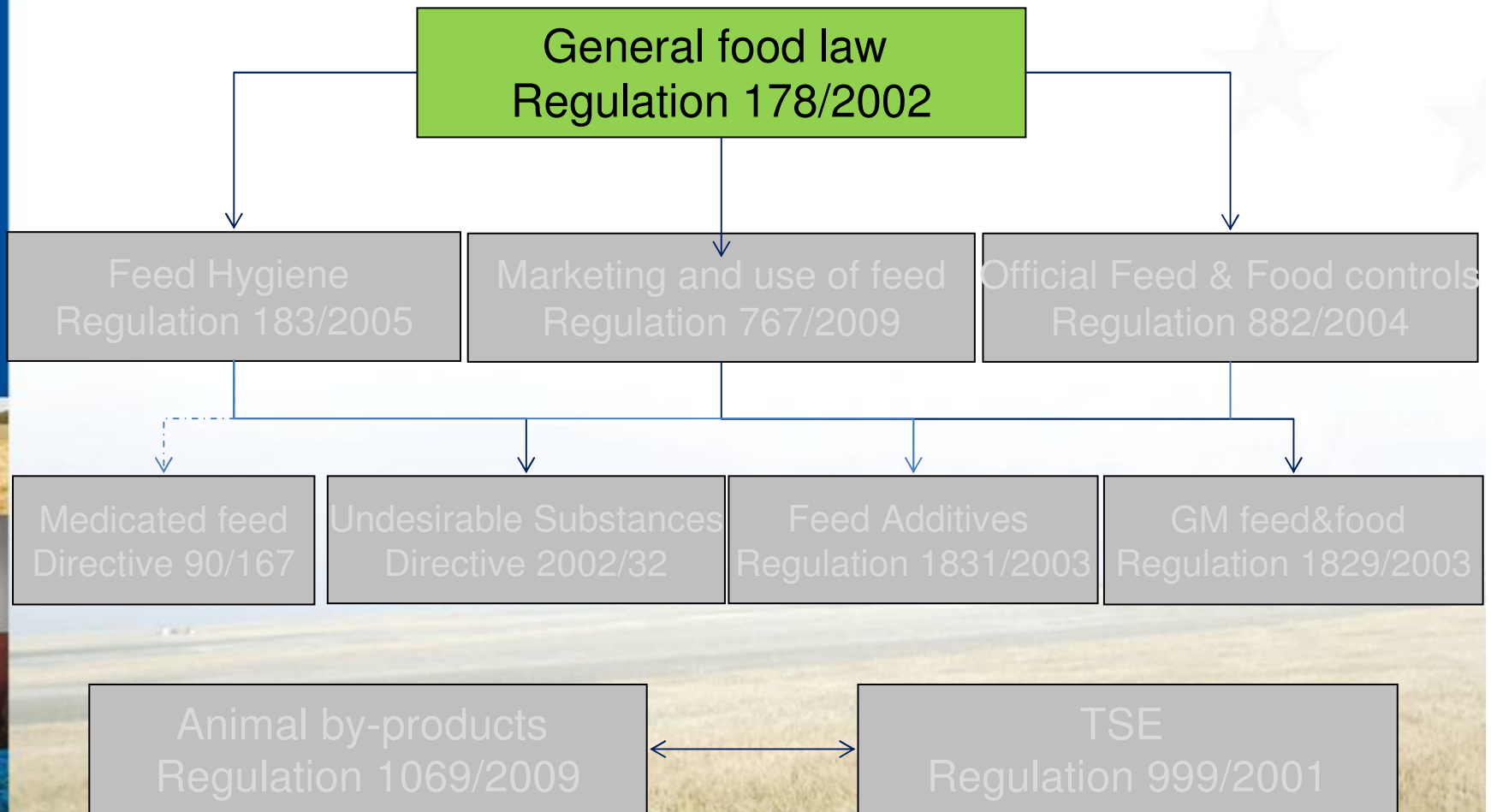


Situation on 1 July 2013

# Structure of EU feed legislation



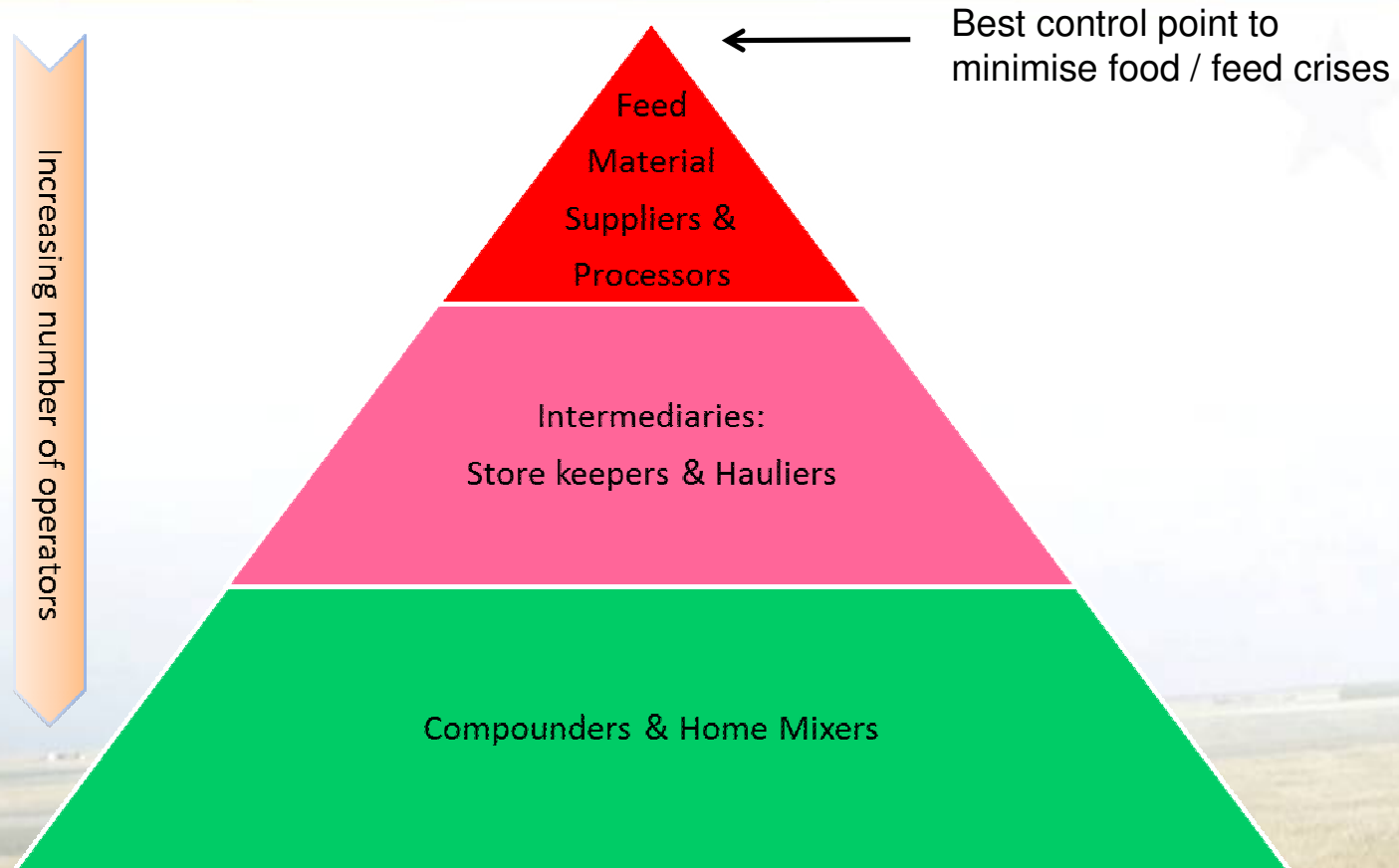
# Structure of EU feed legislation



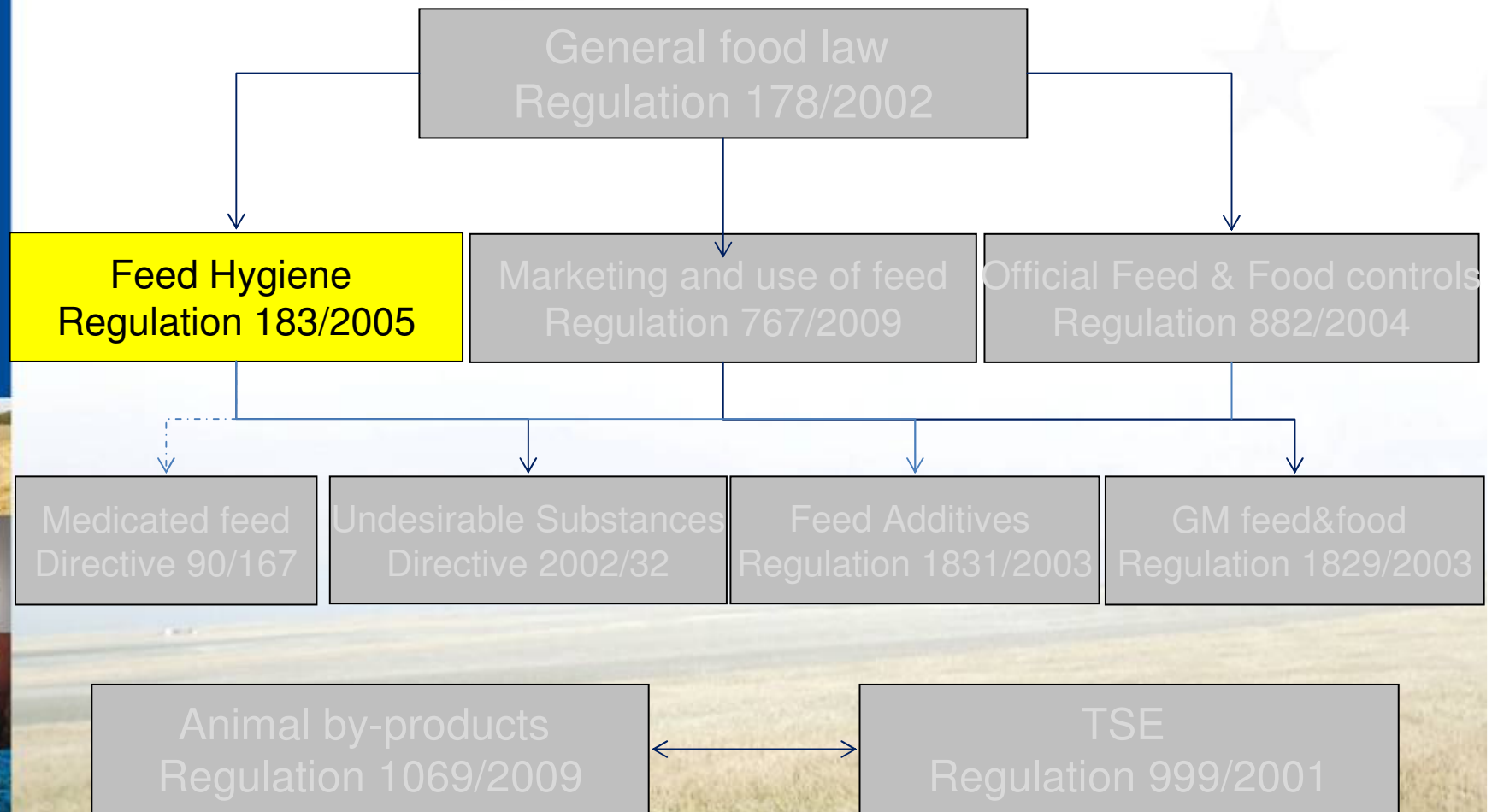
# General food law

- No change foreseen
  - Implementation:
    - responsibility of individual operators: art. 17
- “Food and feed business operators at all stages of production, processing and distribution within the businesses under their control shall ensure that foods or feeds satisfy the requirements of food law which are relevant to their activities and shall verify that such requirements are met.”
- « Top-of-the-pyramid » concept

# Supply chain pyramid: primary testing at supplier level



# Structure of EU feed legislation





# Feed Hygiene

- Implementation
  - Update of guides to Good Hygiene Practice (EFMC - Salmonella risk management)
- Future work
  - Review of Dioxin monitoring (Regulation (EC) 225/2012)
  - Approval of former foodstuffs processors



# Regulation (EU) No 225/2012

- **Approval (Reg. (EC) No 183/2005) of**
  - Processors of crude oil
  - Oleochemical industry for the manufacturing of fatty acids
  - Manufacturing of biodiesel
  - Fat blending
- **Mandatory monitoring programme for dioxins**
  - For oils and fats and their derivatives
  - Taking into account the risk profile
  - Integrating the “top-of-the-pyramid” approach
- **Entry into application on 16 September 2012**
- **Review of the dioxin testing requirements by 16 March 2014**

# FEFAC action plan

To prepare for the revision of the dioxin monitoring requirements from 225/2012

- Meeting with feed oils&fats chain on 16 October
  - Update on risk assessment for the different products at stake
  - Identification of practical problems with implementation of the monitoring requirements and necessary amendments
- Meeting with SCoFCAH early 2014 (tbc)



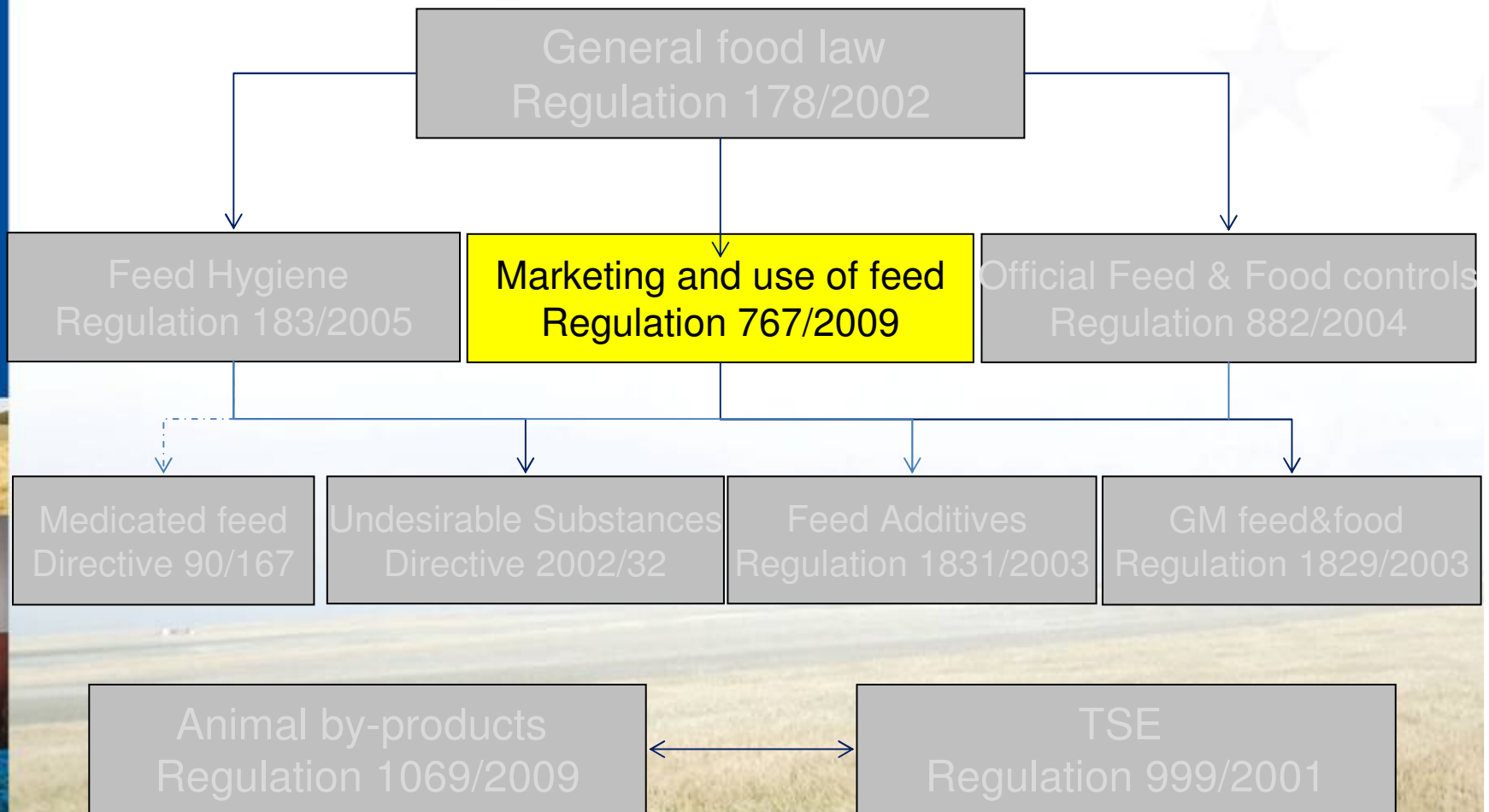


# Review of dioxin monitoring FEFAC wish list

- Clarification of the exemption for oilseed meal feed / stocks
- The compound feed manufacturers should be exempted completely from testing.
- The nature of the evidence should be clarified, i.e. the results of analysis. If the results of the monitoring cannot be clearly linked to a batch (in case e.g. of continuous production processes), then the customer should have access to the results of the continuous monitoring.
- Need for a good correspondance between the dioxin monitoring requirements and the catalogue of feed materials to allow easily the customer to clearly know from the labelling, whether he should expect an evidence of testing or not.
- The monitoring requirements for imported products should be clarified.



# Structure of EU feed legislation



# Marketing and use of feed

- Implementation
  - Code of Good Practice (incl. Claims)
- Future work
  - Review of Annex VI and VII (declaration of feed additives)
  - New update of the EU Catalogue of feed materials (2014?)



# Review of Annex VI and VII FEFAC wish list

- To limit the declaration of feed additives to those with a maximum limit for target species (instead of any species)
- To allow for abbreviations of feed additives names
- To allow declaration of trace-element compounds by the amount of the element (e.g. copper (copper sulphate): X mg of copper

# Declaration of TE compounds

## State of implementation in Oct 2013

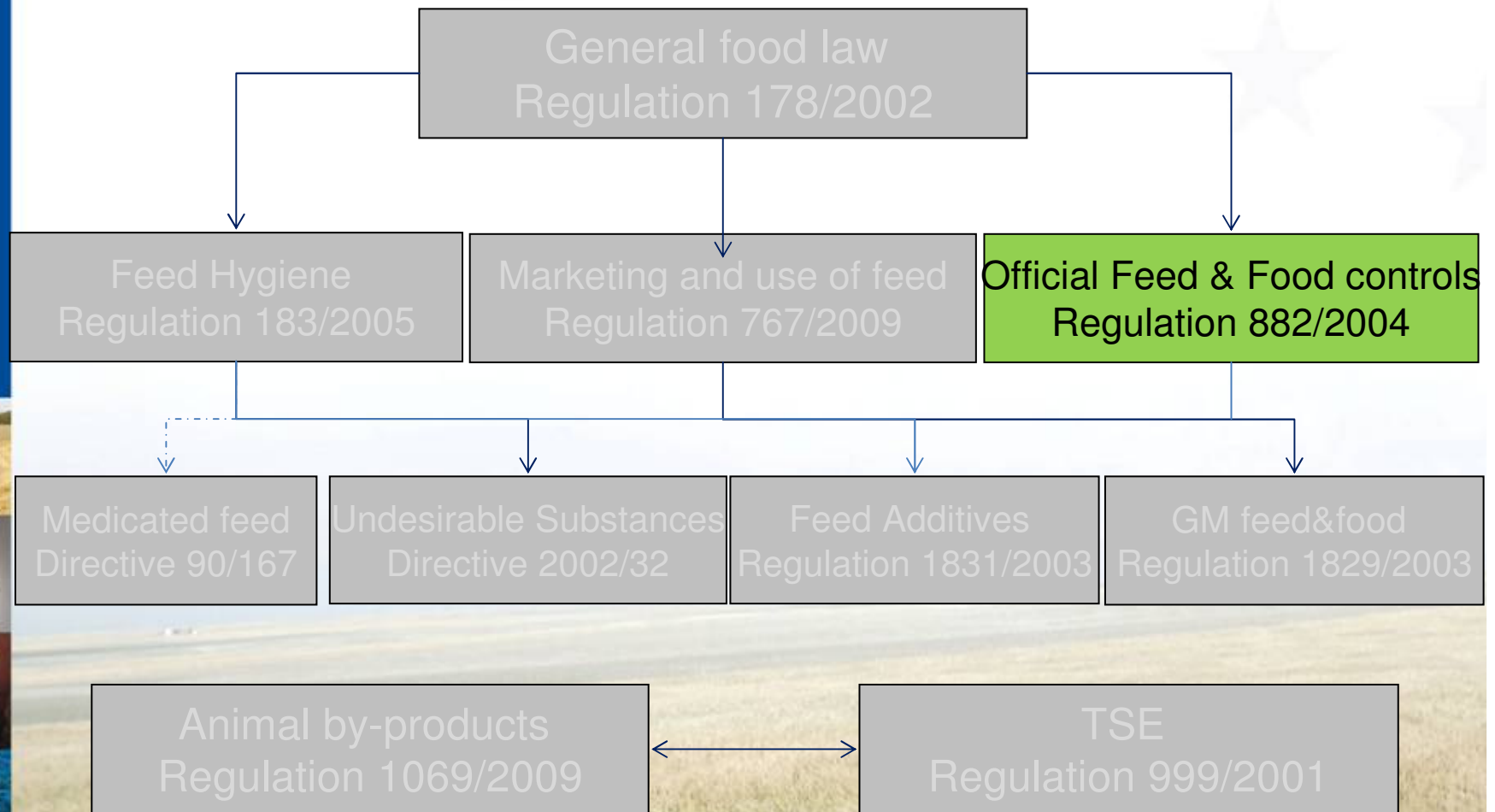
(source: FVO reports, FEFAC experts)

- Declaration by the amount of the compound:  
Italy, UK, Ireland, Denmark
- Declaration by the amount of the TE: France, Germany, Belgium, Spain, Portugal, The Netherlands, Austria, Czech Republic, Estonia, Bulgaria, Finland, Hungary, Latvia, Slovakia, Sweden
- Slovenia?





# Structure of EU feed legislation



# Official controls

- Implementation
  - FVO inspection reports
- Future work
  - Recasting of regulation (EC) No 882/2004



# Overview of results 2006-2011: FVO mission on official feed controls

- The requirements for designation of the competent authorities carrying out official controls in the feed sector and the resources at their disposal were largely met;
- Deficiencies in the cooperation between different competent authorities affected official controls in the feed chain;
- Limited level of expertise of feed inspectors, notably as regards HACCP and cross-contamination;
- While inspection and sampling programmes were largely risk-based, this approach did not take into account the **reliability of operators' own checks**;



# Overview of results 2006-2011: FVO mission on official feed controls

- Official controls on imported feed were not satisfactorily complied with, where certain risks posed by imported products were not adequately taken into account;
- Requirements for antibiotics, coccidiostats and histomonostats as feed additives and for undesirable substances were largely met;
- In many Member States, **measures to avoid or minimize cross-contamination, as well as HACCP-based procedures were deficient**, with poor controls on these topics.
- Requirements concerning **maximum permitted levels of residues of coccidiostats in non-target feed and for prohibited packaging material were not fully met.**





# FVO workshop on feed hygiene

## Conclusions

- Contacts between the feed industry and the competent authorities should be encouraged for the purpose of building mutual confidence and to promote the exchange of data;
- Access to aggregated data on the results of monitoring activities carried out by industry would be useful to establish trends that could allow better targeting of official monitoring programmes;
- Share risk based approach methodology in order to identify best practices and facilitate the drawing up of a formal system in those cases where it is not in place;
- Share information on the issue of cross-contamination is approached in the respective countries, as well as supporting technical documentation.





# Official controls – Main proposed changes

- Extension of scope (e.g. plant health)
- Full control cost recovery (incl. routine controls) except micro-enterprises
  - Flat rate by sectors with malus system
  - Actual costs
- Classification of operators
- Possibility to publish results of controls of individual operators





# Official controls – Basic FEFAC position

- Supports more harmonisation, more efficiency, more risk orientation
- On fees
  - Against 100% funding by companies
  - Supports a bonus system taking into account own controls system and company's performance
  - Exemption of micro-enterprises is unfair
- On other aspects
  - Supports publication of controls results but warns against risk misperception (« name and shame »)
  - Need for improved cooperation between authorities and operators





# Characteristics of EU feed safety assurance schemes

- Built on the basis of the existing Guides to Good Hygiene Practice
- Include additional modules:
  - Generic Risk Assessment
  - Monitoring Programme
  - More detailed guidance on HACCP
  - Early warning systems
- Certified by third party





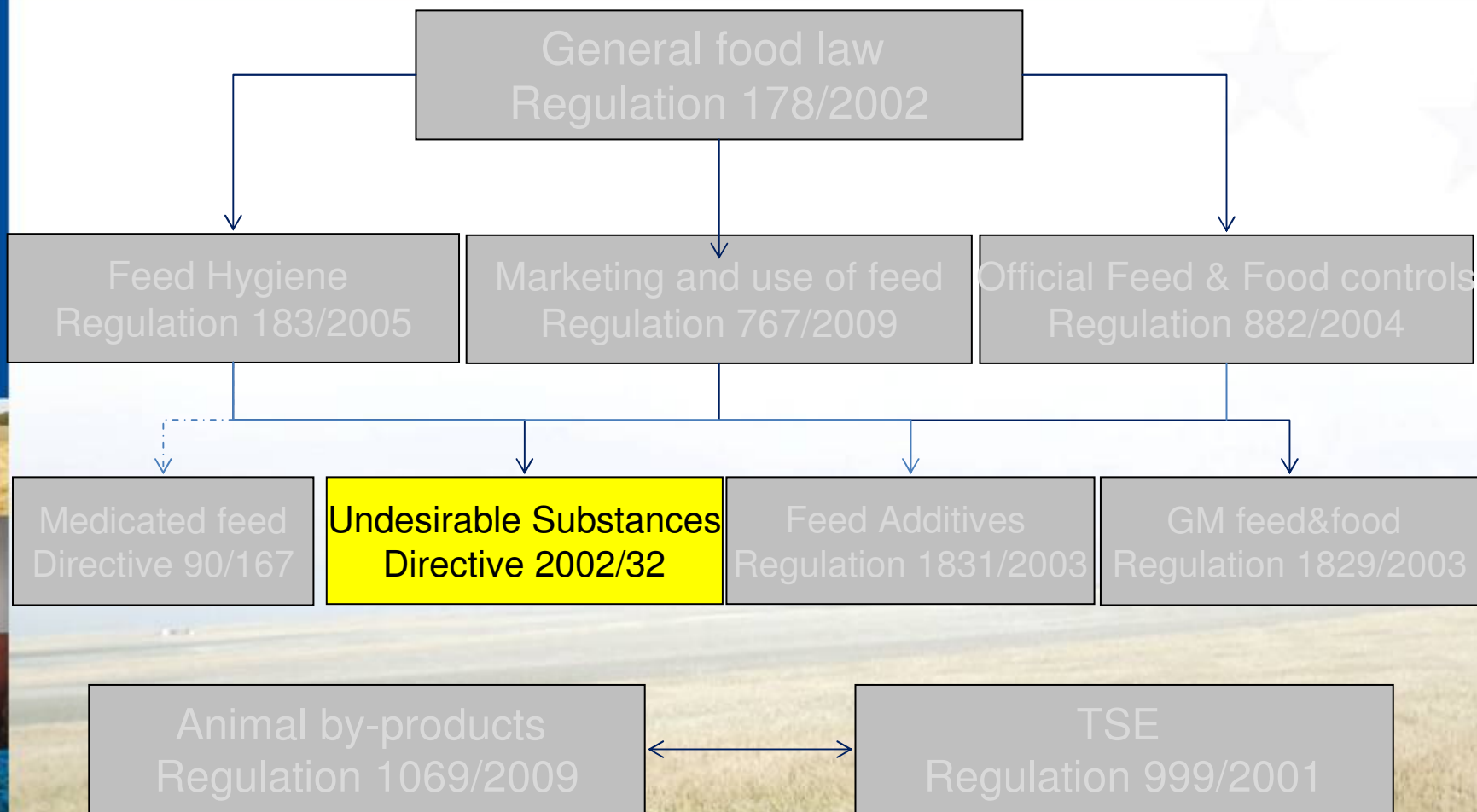


# What can Feed Safety Assurance Schemes contribute to?

- Understanding and identifying the risks better
  - Use of EU and international alert systems for new and emerging risks as they arise
  - Generic risk assessment facilitating risk management by companies
  - Collective monitoring
- Better co-ordination of follow-up to emerging feed safety risks
  - More rapid and efficient information exchange between feed chain partners
  - More timely response to competent authorities



# Structure of EU feed legislation



# Contaminants

- Implementation
  - EU Commission guidelines for aflatoxin
  - EU guidance on monitoring of T2-HT2
  - Emerging issue: max limit for pesticides
- Future work
  - Towards new guidance values for more mycotoxins?
  - Detoxification criteria



# Issues

- Heterogeneous distribution of the aflatoxin contamination and representativeness of the samples taken (especially of large lots) → variability of the aflatoxin results
  - Between several samples taken from the same (large) lot
  - Between samples taken from the same lot (or parts of the lot) but at different stages in the distribution chain
- transparency of the findings on a lot in the distribution chain // non-timely notification of non-compliance by the operators in the chain.



# DG SANCO action plan on aflatoxins

- To draft a technical note on the practical implementation of the different sampling methods, together with information on management of consignments based on analytical results; input from GAFTA and ISO was requested to explain how the private sampling schemes operate;
- To draft good practices for the management of highly contaminated but compliant consignments;
- To discuss with Member States how to improve Early Warning System (pre-and post-harvest) and communication with stakeholders.



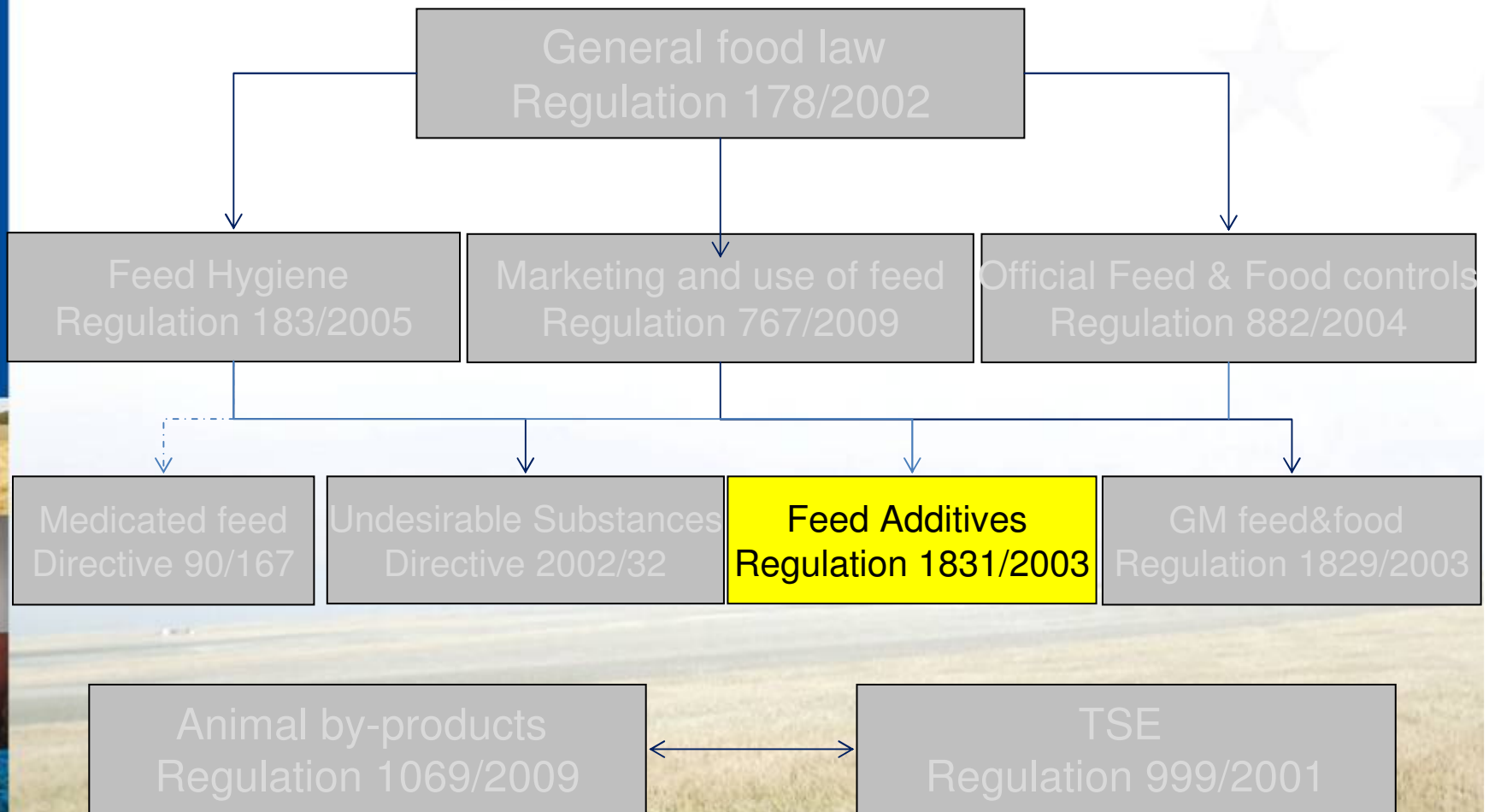
# Elements of possible EU guidance

- Managing variability of results for compliant lots
  - Importance of representative sampling.
  - Lots with significant presence of aflatoxins at levels compliant with legislation (i.e. between 5 and 20 ppb aflatoxin B1), it is recommended to use this maize preferably for production of feed for non-dairy animals or only at low incorporation rates in feed for dairy animals.
- Non compliant lots
  - Detoxification possible but it is prudent not to use the decontaminated maize for the production of feed for dairy animals
  - In the case of non-compliance of very large lots of maize, if in case following an intensive sampling procedure it can be demonstrated that certain parts of the large consignment are compliant with EU legislation, this part can be following agreement by the competent authority be used for the production of feed.
  - Also in these cases it is prudent to use this maize for the production of feed of non-dairy animals or to use it only at low incorporation rates in feed for dairy animals.

# FEFAC approach of the management of the Aflatoxin risk

- Top-of-the-pyramid principle shall apply
- Whenever contamination is detected, the contaminated lot shall be isolated and traceability ensured
- Need to reconsider contractual aspects to secure:
  - Compliance of delivery with legal limits
  - Representative sample (sampling procedure)
  - Analysis by independent accredited lab
  - Transmission to buyer of analytical results when above 5 ppb
  - Right to reject
  - Financial liability

# Structure of EU feed legislation





# Feed additives legislation

- Implementation
  - Re-authorisation of feed additives
  - Use of feed additives in water (feed vs. biocides)
- Future work
  - New functional group for hygienic feed additives (e.g. formaldehyde)
  - Abbreviations for names of categories/functional groups
  - Review of feed labelling rules along the chain (?)

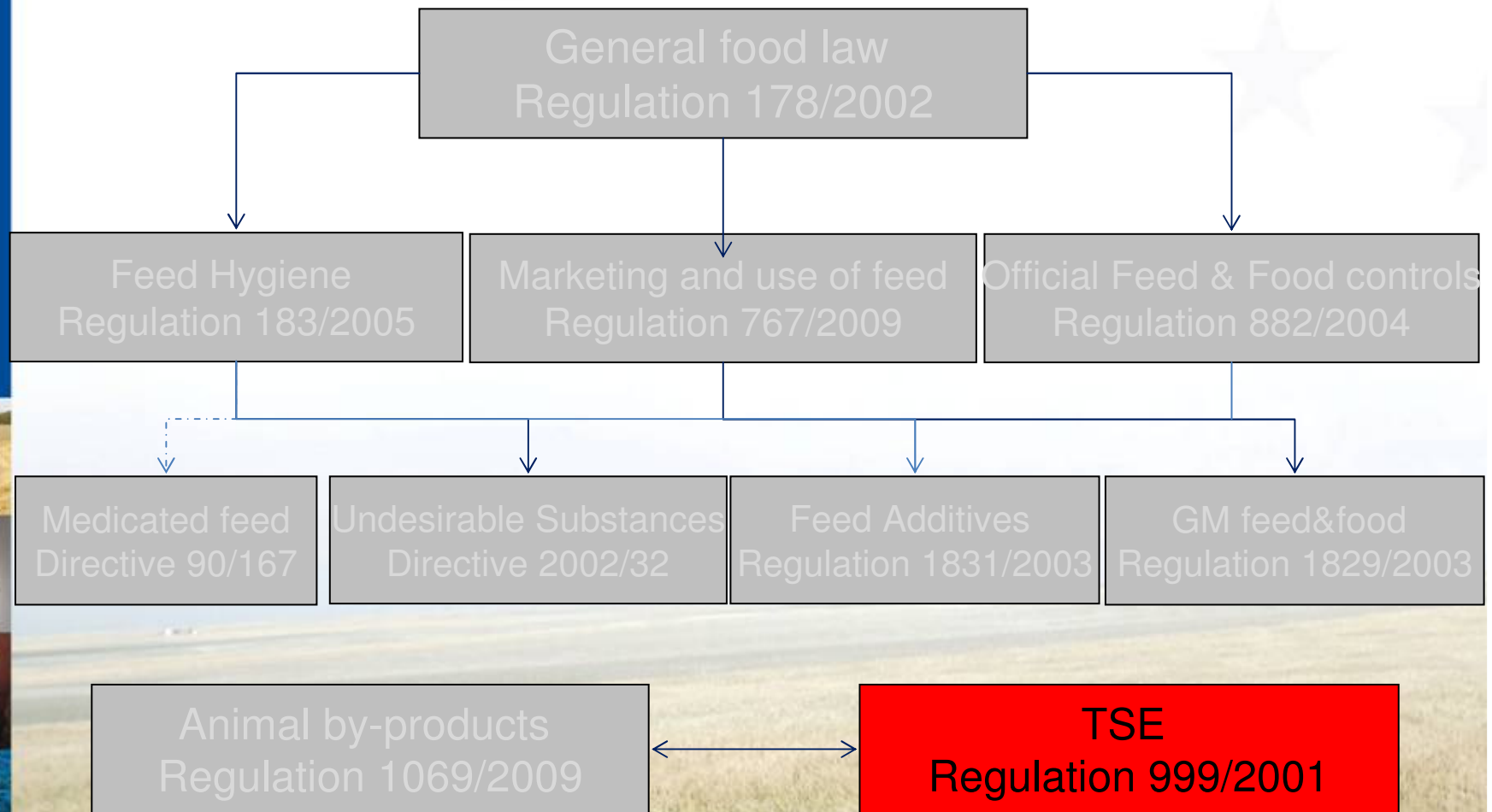




# Re-authorisation of feed additives: Cobalt compounds

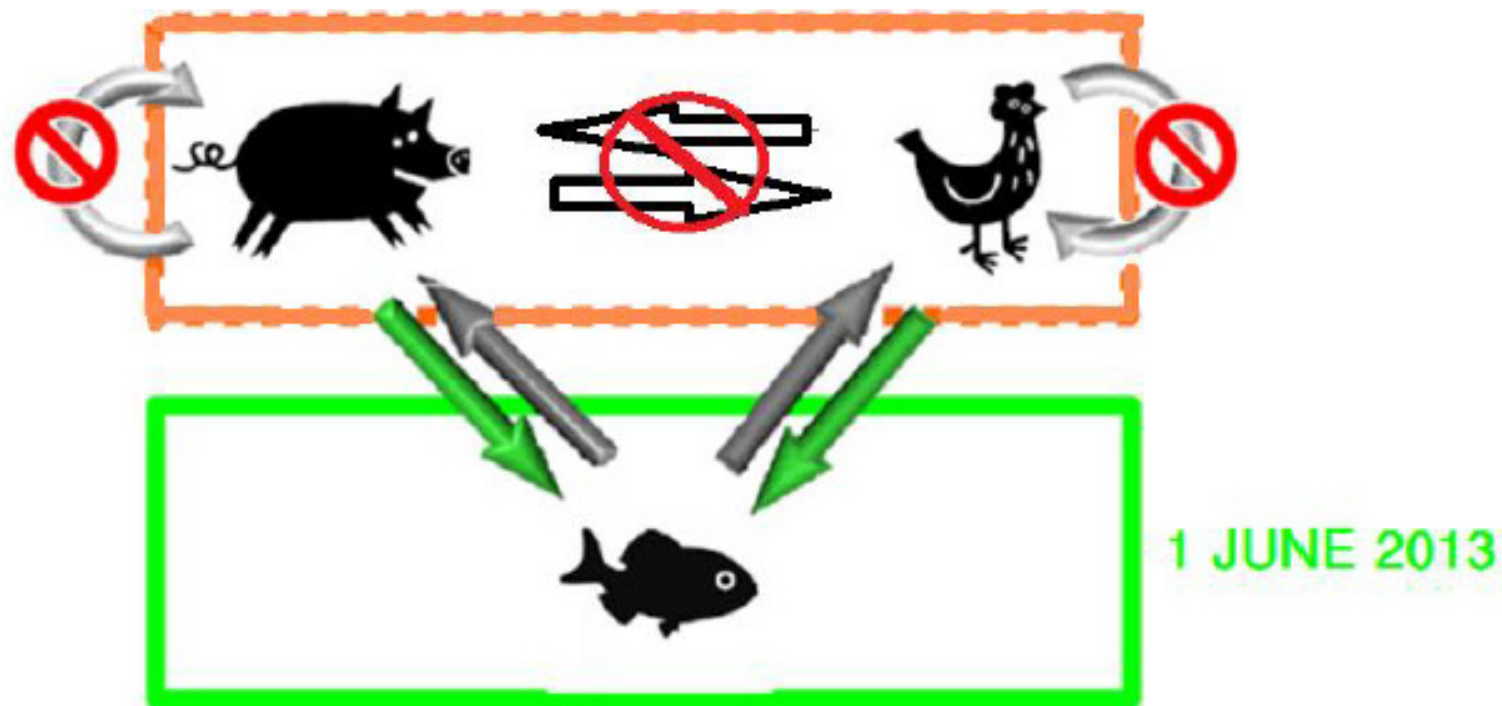
- Regulation 601/2013 requires that feed containing certain cobalt compounds shall be pelleted - entry into application on 15 January 2014
- Problem: mineral feed are not pelleted
- Co-ordinated FEFAC /EMFEMA lobbying plan to obtain the revision of the Regulation
- Study from EMFEMA in August 2013 showing low exposure from feed containing cobalt carbonate
- Discussion re-opened at SCOFCAH level
- Alternative requirement considered: « Appropriate measures shall be taken to reduce the cobalt emission of compound feed containing the additive to max. 0.1  $\mu\text{g Co/m}^3$ ”
- Vote in December – publication in January
- Transition measures

# Structure of EU feed legislation



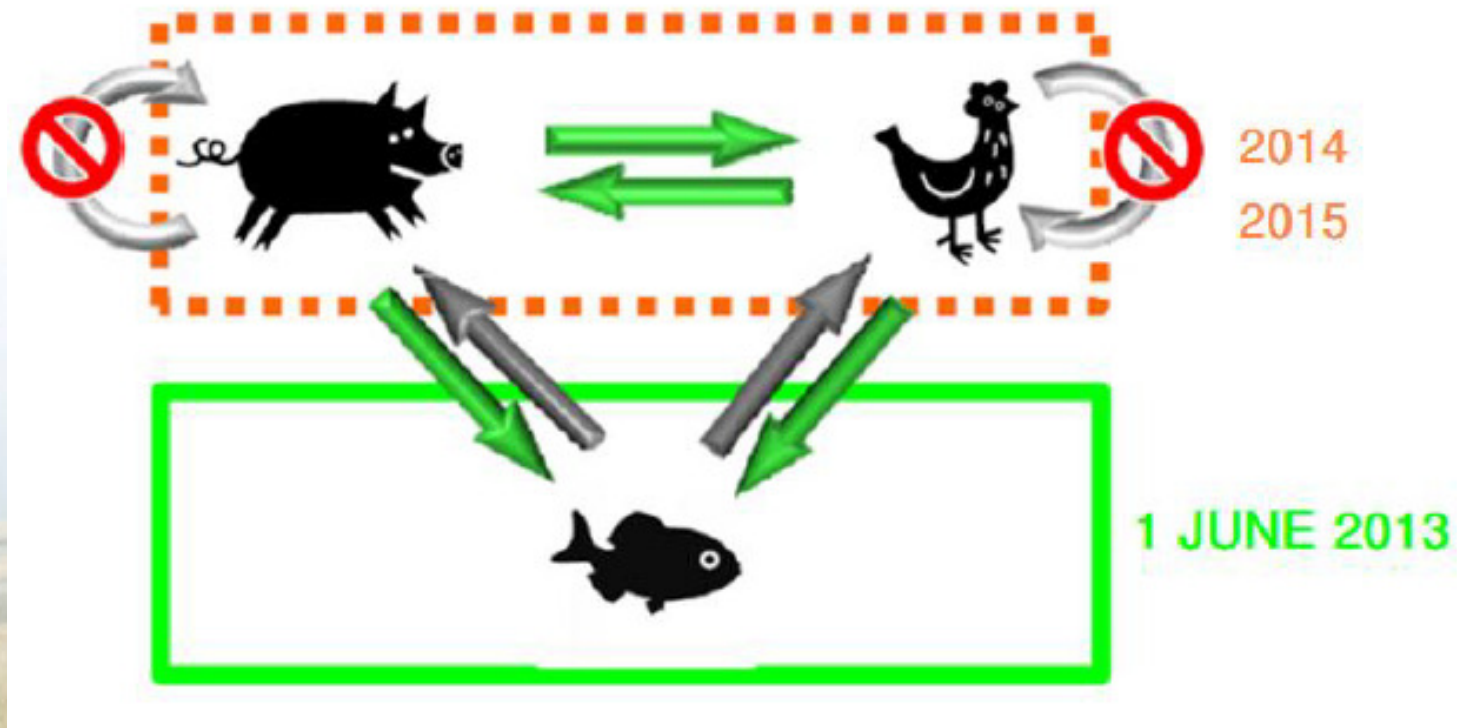
# Review of the feed ban

- Re-authorisation of non-ruminant PAPs in fish feed from 1 June 2013



# Feed ban next steps

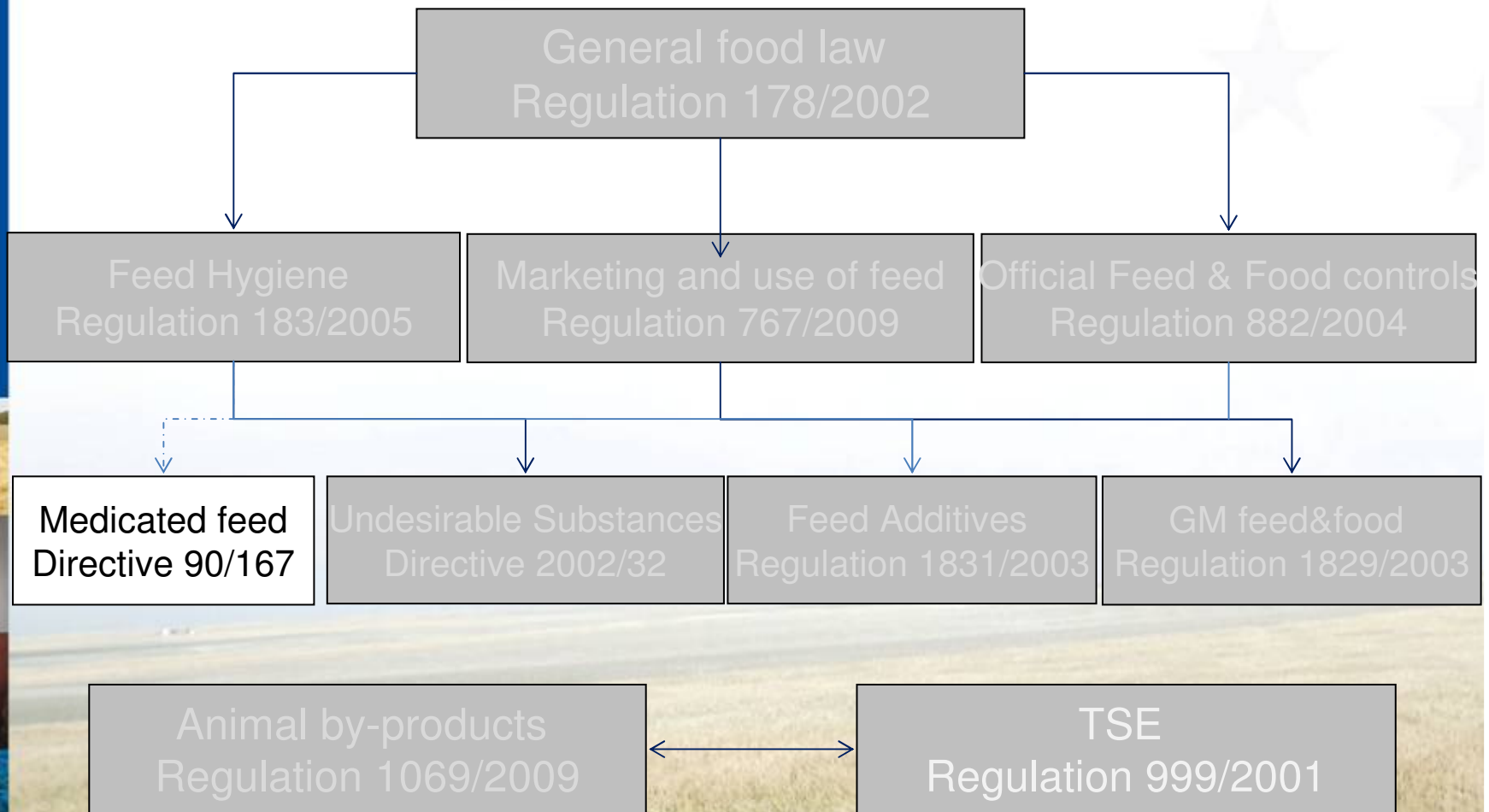
- Re-authorisation of poultry PAPs in pig and pig PAPs in poultry: 2014? 2015? 2016? Later? ... Never?



# Feed ban next steps

- Re-authorisation of poultry PAPs in pig feed:
  - To be used only in dedicated pig feed mills
  - No tolerance for pig PAPs in pig feed
  - Discussion postponed until autumn 2014 (Delay in development of correct PCR method for pork)
  - In application not before 2016
- In the meantime:
  - Authorisation of processed insect proteins in non-ruminant feed

# Structure of EU feed legislation





# Review of medicated feed legislation

- Regulation with
  - clarifications of the **scope**
  - **precise EU standards for manufacturing** of MF in terms of mixing technology, **homogeneity** and **inclusion rates** of incorporation of veterinary medicinal products into feed
  - **anticipated** MF production, mobile and on farm mixing will be authorised in the EU
  - EU **maximum residues levels of VMPs in feed** will be established based on an assessment of the risk for the animals and the humans with regard to the different types of active substances, taking into account the issue of antimicrobial resistance
- Cross reference to voluntary guides to good hygiene practice
- Publication of proposal likely in autumn 2014
- Adoption in autumn 2016?



# In short

- Mandatory dioxin monitoring will continue in 2014, hopefully clarified
- Code of practice for compound labelling to be (soon?) adopted - should be helpful for claims
- Dispute on declaration of trace elements compounds still not solved. In 2014?
- EU Commission proposal to make companies pay for 100% official control costs – may come into application in 2016
- Vigilance required for aflatoxin in maize – guidance from EU Commission expected in coming months
- Cobalt: towards a pragmatic solution
- Use of poultry PAPs in pig feed: unlikely before 2016
- Medicated feed: towards the end of the 0-tolerance for residues of VMD in non-target feed in 2017

**Thank you for your  
attention**

**Questions?**

[www.fefac.eu](http://www.fefac.eu)

**FEFAC**

Fédération Européenne des  
Fabricants d'Aliments Composés

Europäischer Verband  
der Mischfutterindustrie

European Feed  
Manufacturers' Federation

