

DIOXIN CRISIS MANAGEMENT BY THE EU FEED INDUSTRY

19-20 October 2011

Alexander DÖRING
FEFAC Secretary General





Agenda

- **General information about FEFAC**
- **Context**
 - RASFF feed results
 - FVO findings on Feed Hygiene implementation
- **FEFAC Action plan**
- **Key recommendations**



Active Members

VFÖ	Austria	1995 (1964)
APFACA/BEMEFA	Belgium	1959
CFA	Cyprus	2004 (2003)
CMSOZZN	Czech Republic	2004 (2000)
DAKOFO	Denmark	1973
FFDIF	Finland	1995 (1993)
SNIA	France	1959
DVT	Germany	1959
SEVIZ	Greece	1989
ASSALZOO	Italy	1959
IGFA	Ireland	1973
LGPA	Lithuania	2005
NEVEDI	The Netherlands	1959
IZP	Poland	2004 (2001)
IACA	Portugal	1986 (1976)
AFPWTC	Slovakia	2004 (2003)
GZS	Slovenia	2004
CESFAC	Spain	1986
FS	Sweden	1995
LANTMÄNNEN	Sweden	1995
AIC	United Kingdom	1973

(observer as from ...)

Observer Members

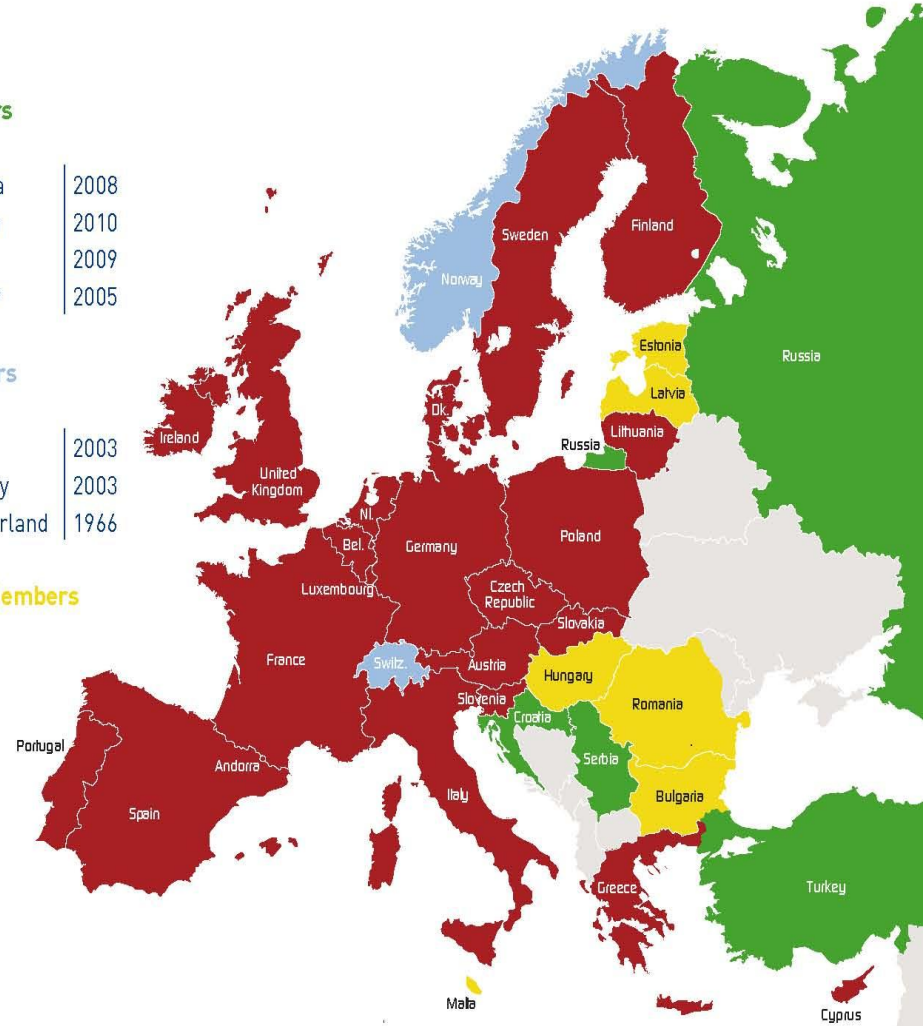
CFIA	Croatia	2008
RUFM	Russia	2010
SFMA	Serbia	2009
TURKIYEM	Turkey	2005

Associate Members

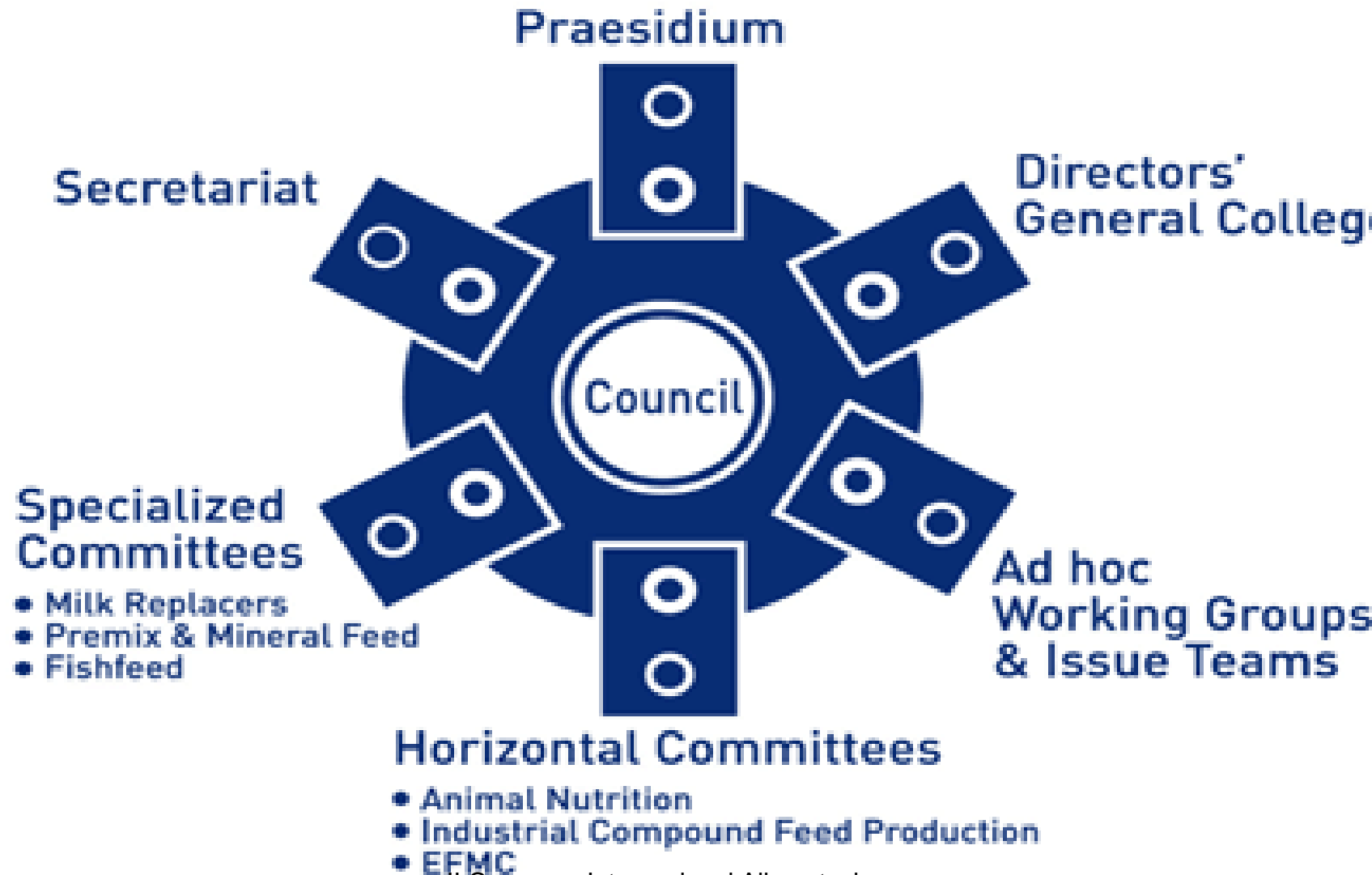
EMFEMA		2003
FHL	Norway	2003
VSF	Switzerland	1966

Potential Active Members

Bulgaria
Estonia
Hungary
Latvia
Malta
Romania



Organisation Chart



FEFAC Structure - Committees

Animal Nutrition

Chairman: E. Dam Jensen (DAKOFO)

Vice-Chair: P. Radewahn (DVT)

Industrial Compound Feed Production

Chairman: A. Sebastia (CESFAC)

Vice-Chair: J. Piçarra (IACA)

Milk Replacers

Chairman: G. Kleinhout (SNIA)

Vice-Chair: H. Boeve (NEVEDI)

Premix and Mineral Feed

Chairman: R. Sijtsma (NEVEDI)

Vice-Chair: J.F Labarre (SNIA)

Fish Feed

Chairman: A. Allodi (ASSALZOO)

Vice-Chair: K. T. Maeland (FHL)

EFMC

Chairman: S. Ferrari (ASSALZOO)

Vice-Chair: Y. Dejaegher (BEMEFA)



Praesidium members

Patrick Vanden Avenne	APFACA	President
Aurelio Sebastia Aguilar	CESFAC	Deputy President
Adolphe Thomas	SNIA	Treasurer
Ad Hectors	NEVEDI	
Marek Kumprecht	CMSO ZZN	
Helen Raine	AIC	
Dietrich Schwier	DVT	
Torben Harring	DAKOFO	
Giordano Veronesi	ASSALZOO	



Issue Team “Dioxin”

Leader Helen Raine AIC (UK)

Experts

Patrick Vanden Avenne	FEFAC (BE)
Yvan Dejaegher	APFACA-BEMEF A (BE)
Peter Radewahn	DVT (DE)
Manfred Hessing	NEVEDI (NL)
Erik Dam Jensen	DAKOFO (DK)
Lucile Talleu	SNIA (FR)
Deirdre Webb	IGFA (IE)

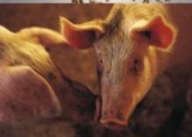


FEFAC

Context

RASFF feed results

**FVO findings on Feed Hygiene
implementation**

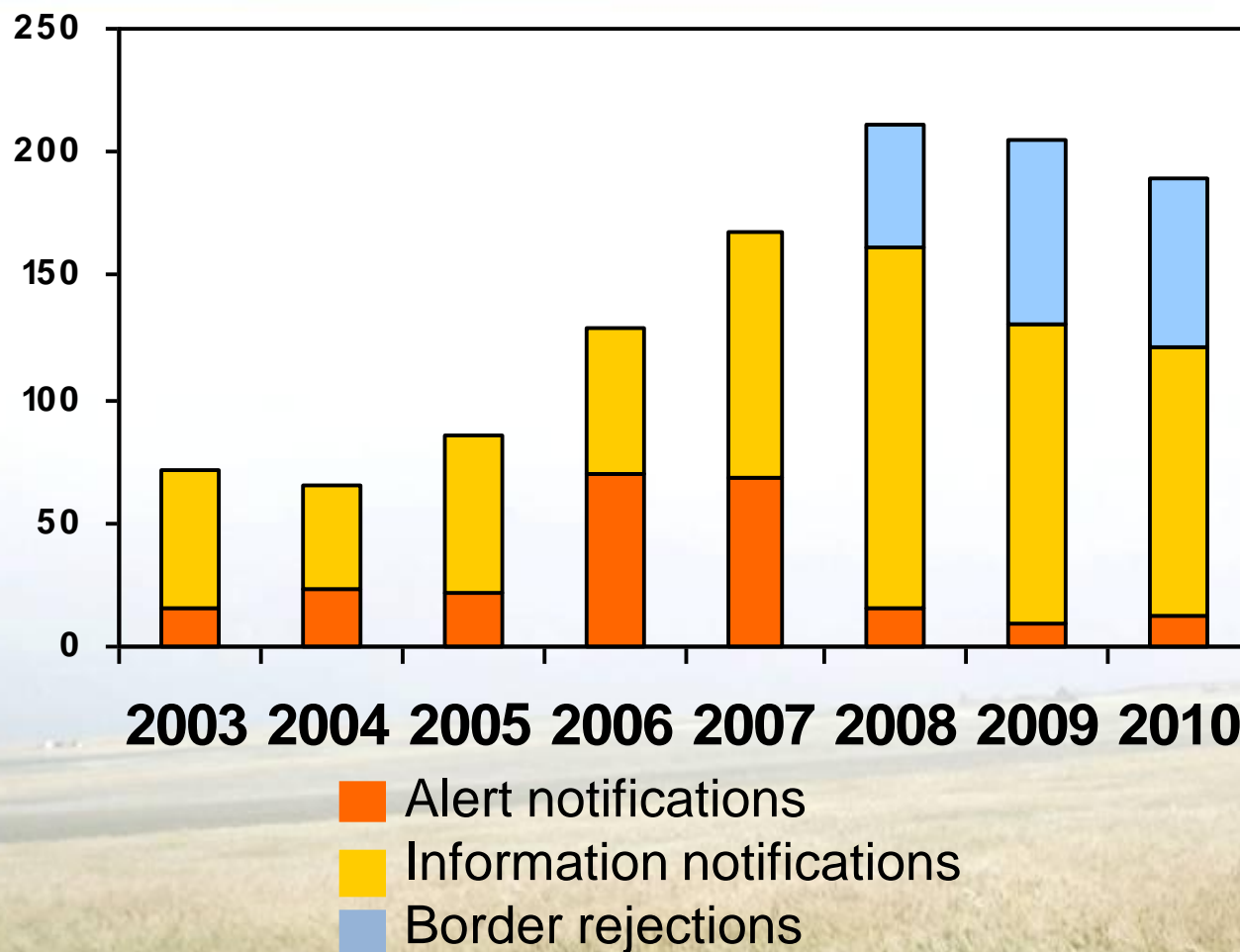


Feed notifications to RASFF

Key findings for 2010

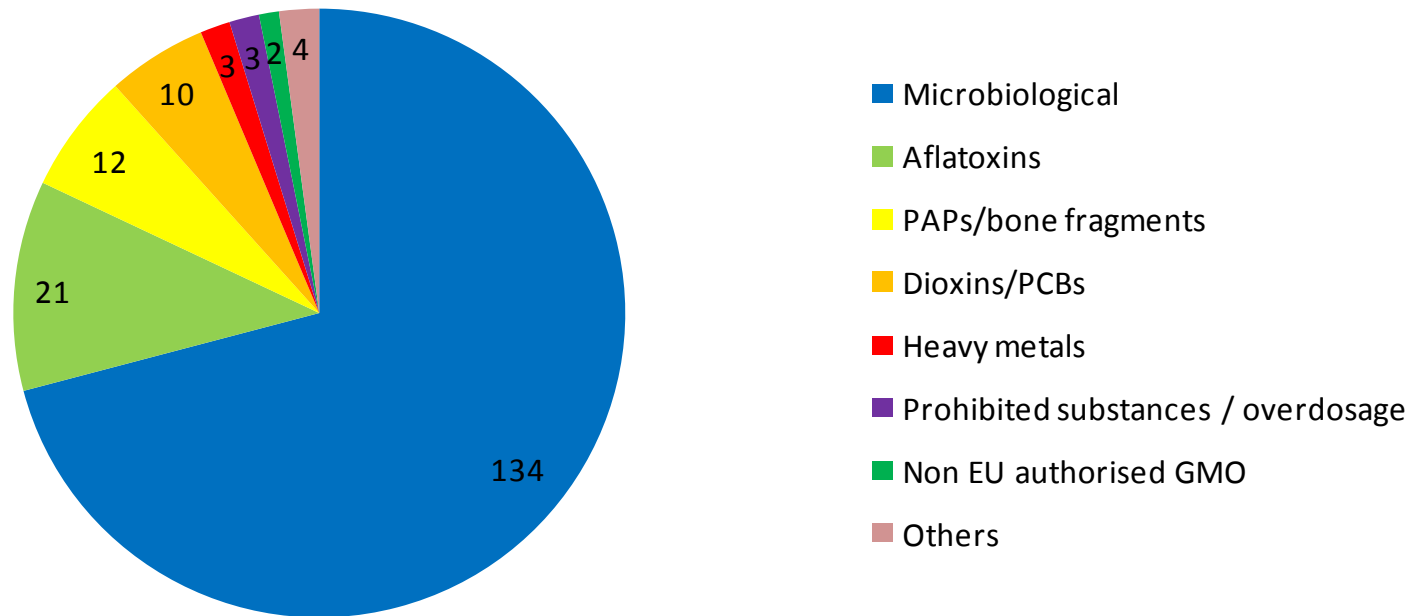
- -8% number of notifications for feed (incl. petfood) (+4% for food notifications)
- 70% notifications relate to Salmonella in feed materials or petfood (134 notifications; +26% vs. 2009)
- Rest (30%) represents 55 notifications (-56% vs. 2009)
- 12 alerts, thereof 6 for PCBS/dioxins in feed materials, 1 for heavy metals and 5 for Salmonella contamination in petfood;
- Contamination with traces of GM events not yet approved in the EU (linseed) remains a standing issue, with 2 notifications.

Feed notifications to RASFF



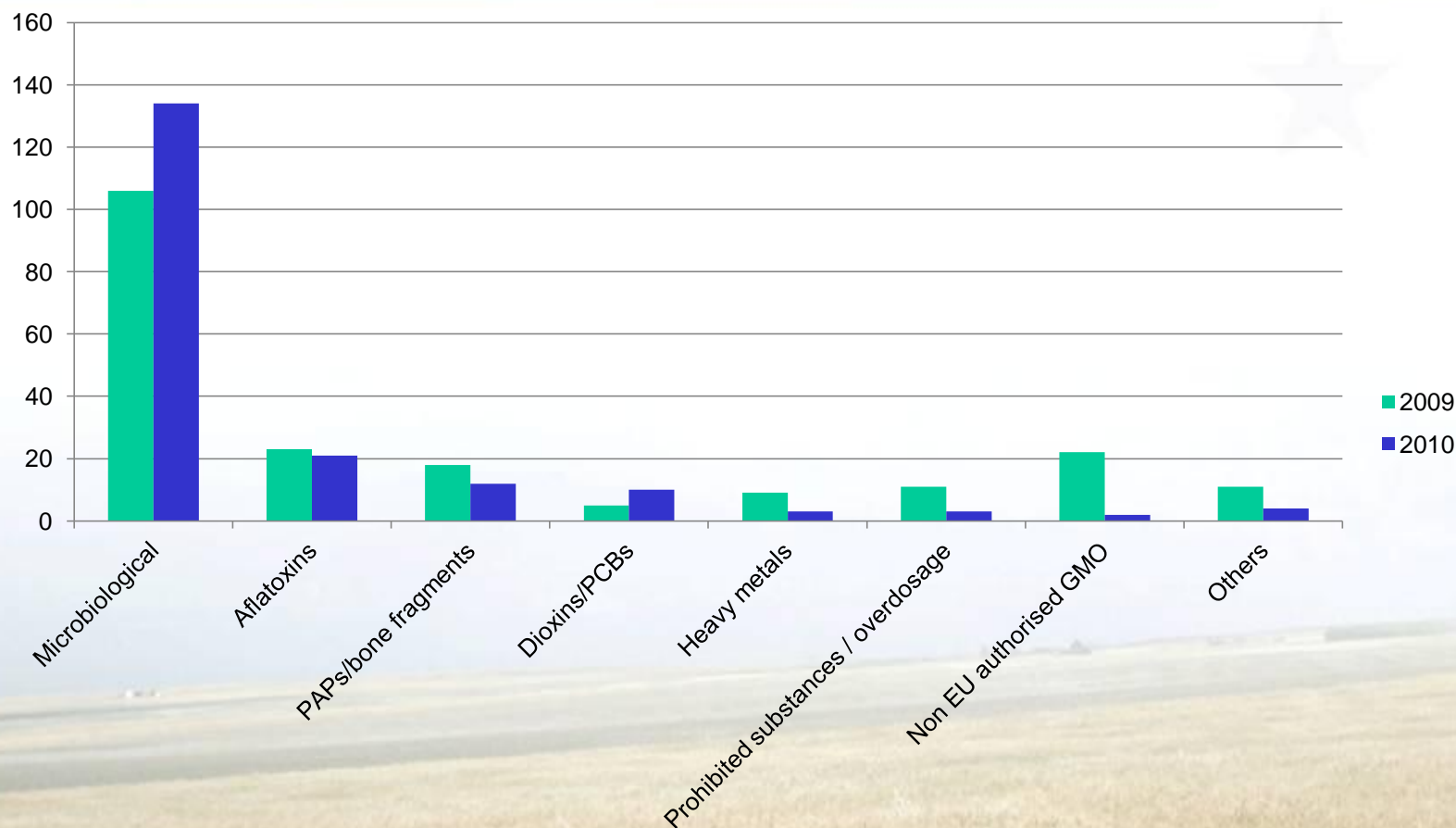
Feed notifications by categories

Notifications in 2010 by type of contaminant



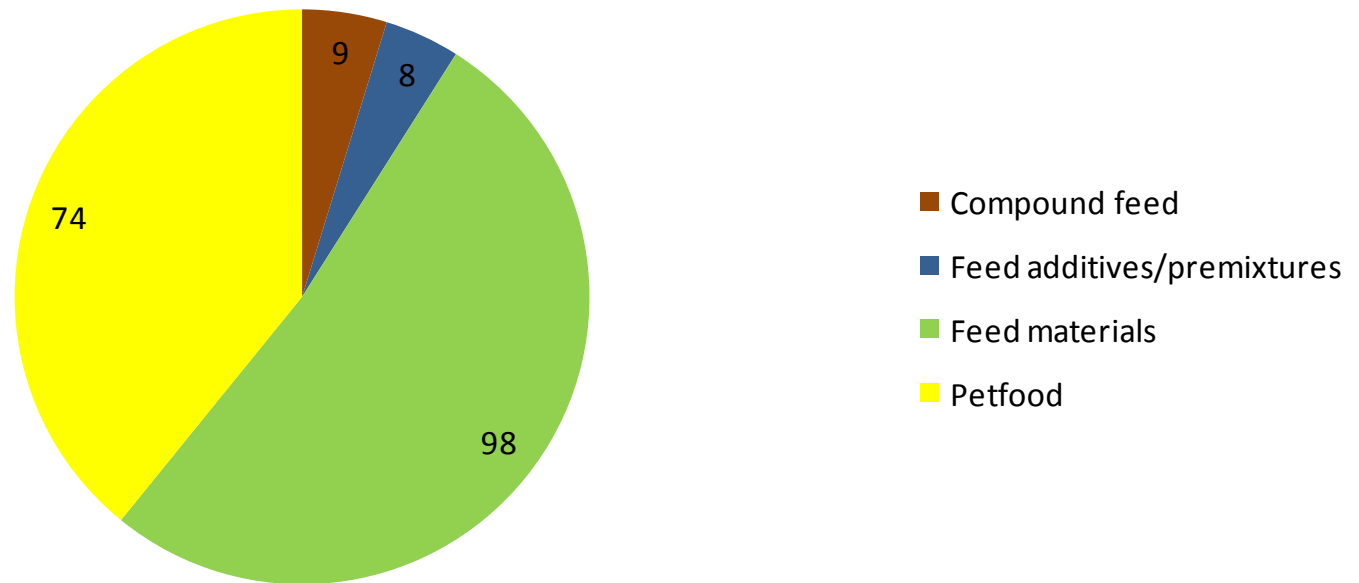


Feed notifications in 2009 and 2010 by contaminants (incl. Petfood)



Feed notifications by type of feed

Notifications in 2010 by type of feed



Implementation of Annex II + HACCP

Results of FEFAC enquiry 2011

- Market driven voluntary feed safety standards and control already in place in several MS before 2005
- Extra costs usually not estimated for implementation and maintenance
- Limited use of external assistance for implementation and training of staff and not at all today
- The systematic hazard analysis made us more aware of possible risks
- Authorities in most cases not participating in or supporting the HACCP implementation process
- In general feed material suppliers had a slow start but are catching up

Overview of results 2006-2010: FVO mission on official feed controls

- Always in place
- Guidance & check-lists used for implementation
- In some cases, risk based approach affected:
 - limited assessment of own-checks
 - limited knowledge of some feed operators
 - no proper history of compliance
- In few cases, only “classical” operators covered, in other ones no control yet at primary producers
- In some (recent) cases, intensity of controls reduced due to limited resources (impact of cut-backs on public expenditure) and low priority given to feed controls
- Limited used of registers of feed operators

Overview of results 2006-2010: feed hygiene (I)

- Approval finalised in most cases (although some shortcomings were noted in few cases)
- Registration on-going (rarely completed)
- Difficulties:
 - primary production
 - food operators
 - “Annex II” farms
 - transporters
 - new activities ...

Overview of results 2006-2010: feed hygiene (II)

- Primary producers:
 - in principle good level of compliance
 - uneven official controls and mostly focused on “Annex I” requirements
- Feed operators:
 - premises and equipment OK
 - records and recall procedures OK
 - limited used of register for safe sourcing

Overview of FVO results 2006-2010: feed hygiene (III) – quality control and HACCP

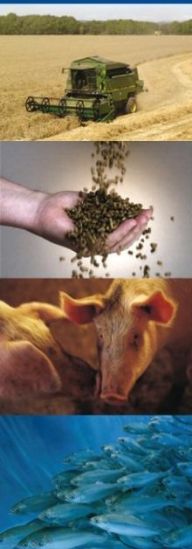
- Weaknesses in the design and implementation of HACCP:
 - lack of adaptation (generic HACCP)
 - definition of CCPs
 - validation of controls
 - HACCP at small scale businesses
- Control of cross-contamination deficient in some cases (non-target species used for flushing)
- Above issues overlooked during official controls in many cases
- Situation prior dioxin incident vs post incident

Dioxin/PCBs - Some examples of contamination cases in the EU

Year	Product	Origin
1998	Dioxin in Citrus pulp pellets	Process (contaminated limestone)
1999	Feed fats	Fraud (disposal of waste oil in UCO container)
1999	Kaolinitic clays	Natural (prehistoric fire)
2000	Choline chloride	Process (use of treated wood as carrier)
2002	Carbosan copper	Process
2003	Dried fodder	Process (direct drying with treated wood)
2004	Potato pulp	Process (use of contaminated clay)
2005	Pig bone fats	Process (use of contaminated HCL)
2008	Bread meal	Process (direct drying with contaminated fuel oil)
2010	Feed fats	Process/Fraud ? (under investigation)



FEFAC Action Plan



Action plan (1)

- EU Feed Hygiene Workshop with COPA/COGECA – 18 February 2011

- DG SANCO feed fat chain stakeholder consultations
 - 5 January 2011
 - 30 January 2011
 - 7 June 2011

- EFMC Committee meeting – 17 February 2011

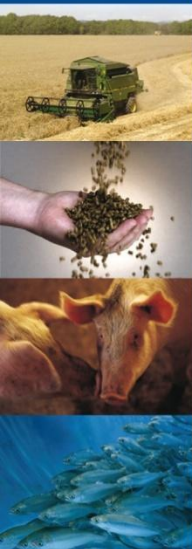
- EFMC/IFSA Workshop – 6 May 2011

Action plan (2)

- Press releases
- Review of feed safety risk assessment with EU feed fat supply chain partners & feed safety assurance systems (GMP+, QS, FEMAS, OVOCOM) : February-July 2011 (ongoing)
- Review of EFMC guidelines & feed safety assurance systems requirements (GMP+, QS, FEMAS, OVOCOM) (ongoing)



Key recommendations



Key recommendations

- FEFAC letters to DG SANCO (February, April, June, July, September 2011)
- Pillar I recommendation: Approval of feed fat establishments
- Pillar II recommendation: Monitoring programme
- Accompanying measures



Pillar I recommendation / Approval

- Extension of approval to all feed fat chain establishments
 - Key step to reduce likelihood of fraud or gross negligence / on-site audits by official control
 - Focus on critical processes in feed fat production
 - Ensure safety of feed fat during storage, transport and handling operations
 - Prevent/ avoid any cross-contamination of feed fats with “technical fats” on production site

Pillar II recommendation / Monitoring

- Focus on « top of the pyramid » of the feed fat chain
- First placer on the market must be responsible for testing and transmission of results to final user along the whole distribution chain
- Opposition to mandatory monitoring of compound feed
 - Not a risk proportionate measure
 - Against HACCP principles laid down in Feed Hygiene Regulation 183/2005
 - Diverting scarce resources from monitoring of other feed safety risks

Pillar II recommendation / Monitoring (2)

- Annual review of the monitoring results at SCoFCAH level with feed chain stakeholders
- Revision of risk assessment of feed fats



Accompanying measures

FEFAC supports

- Revision of feed catalogue
- Revision of negative list
- Inclusion of risky feed fats in list of risk products under Regulation (EC) No 882/2004



**Thank you for your
attention**

FEFAC

Fédération Européenne des
Fabricants d'Aliments Composés

Europäischer Verband
der Mischfutterindustrie

European Feed
Manufacturers' Federation

