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# FEFAC VISION ON FEED SAFETY MANAGEMENT

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Sharing responsibility for feed safety along the chain

Feed Safety must be a given. FEFAC believes in the capacity of the feed chain to manage feed safety risk collectively, efficiently and in close cooperation with authorities. To this end, actions are needed at all levels operators, organisations and Institutions in three main areas:

- Capacity building
- Optimisation of risk management along the chain
- Cooperation between operators and control authorities

FEFAC vision on animal feed industry:  
*A knowledge driven, reliable partner of a competitive livestock sector*

FEFAC vision on feed safety management:  
*Sharing responsibility for feed safety along the chain*

FEFAC vision on animal nutrition:  
*A multifunctional science, delivering solutions to a sustainable livestock sector*

FEFAC vision on sustainability:  
*A responsible and resource-efficient feed industry*

## FEFAC VISION ON FEED SAFETY MANAGEMENT

The premixture & compound feed manufacturing industry is an essential element of the feed chain, sourcing ingredients from a large spectrum of suppliers and delivering to millions of farmers a compound feed which is expected to be safe.

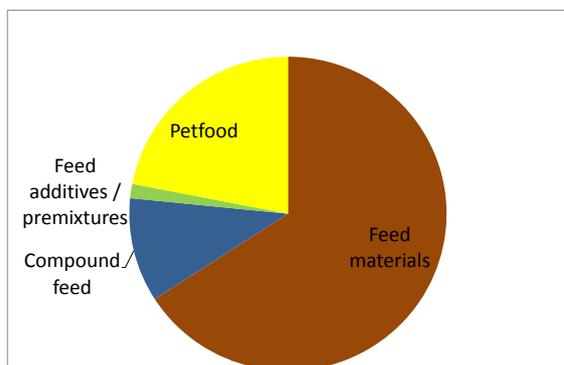
### Drivers for change

A number of feed safety crises in recent years proved how vulnerable the livestock chain can be in case of shortcoming at the level of feed supply. Several elements have contributed to this increased vulnerability.

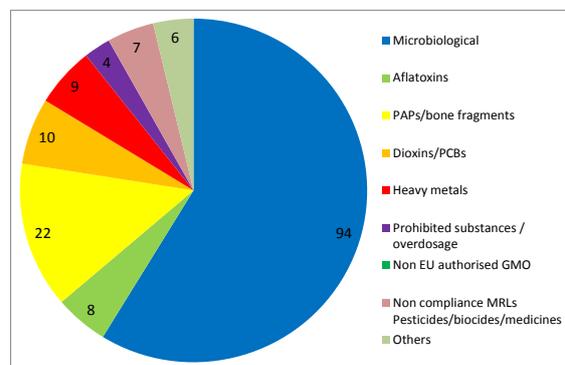
- Most contaminants in feed find their origin at the earliest stages of the feed chain (see figures 1 and 2) and the risk profile of feed ingredients is continuously changing: climate change has e.g. a clear impact on the occurrence of mycotoxins in cereals;
- Competition for resources: the increasing demand for food and the development of non-feed/food uses for crops drove feed manufacturers to look for alternative resources which have not (yet) been fully explored. This includes for example former foodstuffs, algae and also by-products from different industries; these new ingredients have specific risk profiles which often remain to be established;
- Need to reduce waste: the industry (food or non-food) is asked to limit as much as possible wastage of resources, which also encourages them to look for outlets for products that would then avoid classification as waste: the feed outlet is one of these but non-feed industry often has little knowledge of feed safety requirements;
- The legislation is also changing: standards are always more demanding, while (new) technologies still face political and societal distrust;
- With the development and introduction of ever more accurate analytical methods, the level of detection is decreasing and compliance with 0-tolerance policy has become more and more challenging;
- On the other hand, methods of sampling do not improve much and obtaining a representative sample remains a permanent challenge, especially for non-homogenously dispersed contaminants.

All these challenges contributing to make the livestock chain even more vulnerable than before call on all operators involved in the feed chain, including authorities, to join efforts for an optimised feed safety risk management. FEFAC, as responsible organisation of the feed chain, wants hereby to share its vision of an efficient, safety risk controlled feed chain.

**Figure 1:** Origin of incidents by category of feed in 2015



**Figure 2:** Feed RASFF notifications per hazard in 2015



## Foundations of the vision

The principles established under the General Food Law shall remain the pillars of the European Feed Safety risk management policy, i.e.:

- **Responsibility** lies with individual feed business operators for the safety of the feed they place on the market; this element shall be acknowledged by all partners of the feed chain.
- **Traceability** of products shall be ensured, one step back – one step forward.

In addition, FEFAC would like to have the following principles also recognised by all parties:

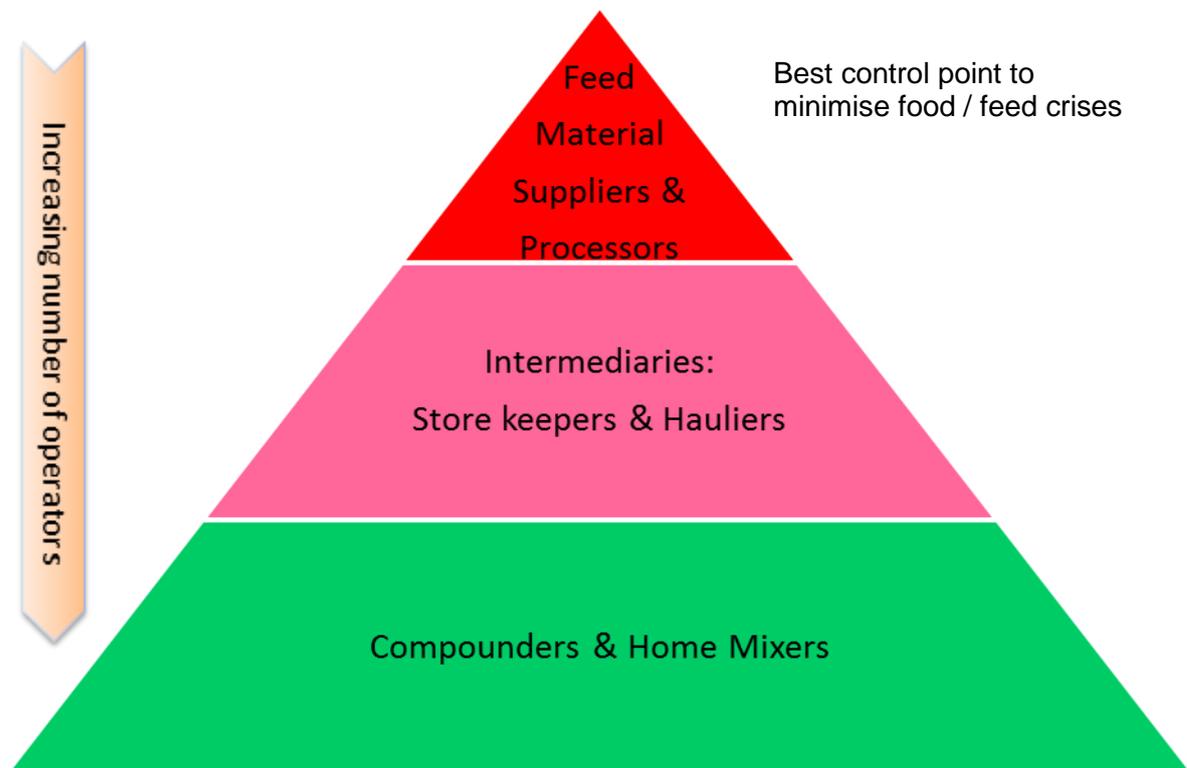
- **Feed safety is non-competitive**: feed safety is a must; any information on emerging risks that can help the chain better manage the risk should be transmitted along the chain and across operators of the same sector;
- **Transparent co-operation between all parties, i.e. authorities and operators should be encouraged**: operators have knowledge about the risk of products under their control, whereas authorities have information on risk profiles of all sectors of the feed chain. Information sharing between authorities and operators has the potential to benefit all.

## Vision

- FEFAC believes in the capacity of the feed chain to manage feed safety risk collectively, efficiently and in close cooperation with authorities. To this end, actions are needed at all levels operators, organisations and Institutions.
- **Efficient feed safety risk management must be implemented at each level of the feed chain**. Delegating responsibility to the next level of the chain can only result in lower efficiency. To this end,
  - o Feed business operators shall not only register as feed business operators, but also **feel like feed business operators**, i.e. co-responsible for the safety of the final feed, animal health and safety of animal products;
  - o An integrated HACCP-based risk management approach must be the method of choice for the hazard control;
  - o Collective data **information exchange among operators of the same sector** should be promoted to facilitate development and maintenance of feed safety risk management systems at individual operator level, in compliance with anti-trust rules.
- The feed chain should aim at **optimising monitoring resources** in a chain perspective. This means:
  - o **Non-compliant feed shall be intercepted at the earliest stage as possible along the “top-of-the-pyramid”** principle (figure 3): experience proves that the later in the chain a contamination case is identified, the more difficult and costly it will be to manage it correctly; this does not exempt downstream parts of the chain to implement controls/monitoring for verification purposes.
  - o **Transmission of information voluntarily along the chain** is a factor of risk management efficiency: the ability to safely use contaminated but compliant consignments of feed ingredients is key to optimise agricultural resources;<sup>1</sup> transmission from supplier to purchaser of monitoring results when available is a factor of optimisation of risk management along the chain.
- Trade organisations shall continue to provide operators and public authorities with **essential tools and generic information**, helping implementation of risk-based management systems; such tools are:
  - o Good hygiene practice
  - o HACCP plan examples (not generic since each individual operator has its own risk profile requiring a specific HACCP)
  - o Geographical mapping (e.g. mycotoxins in grain harvest)
  - o Early warning systems and Incident Management
  - o Collective monitoring schemes
  - o Databases for risk characterisation

<sup>1</sup> For example, a consignment of maize containing aflatoxin at 15 ppb is compliant with EU law; it can be used without specific precautions in pig feed but may only be used at low inclusion rates in dairy feed. If the level of contamination is known by the supplier, the information may be useful for the customer.

Figure 3: "Top-of-the-pyramid" principle



- In addition to facilitating dissemination of good risk management practices along the chain, **Feed safety assurance schemes** are also extremely useful tools for the management of hazard transmission along the chain; their implementation should be further encouraged, although not to be used as a barrier to trade; in this sense, mutual recognition shall remain a key objective;
- **Co-operation between operators and competent control authorities** is essential to achieve efficient, cost effective control systems in the feed chain; control authorities are required to adopt a risk-based approach for official controls; to do so, they should take into account not only the track-records of compliance but also own controls that individual operators are bound to perform as part of their feed business obligations. More co-operation between operators would allow:
  - o Authorities benefiting from the information generated by operators as part of their own controls, possibly collected/collated in a private collective database;
  - o Operators benefiting from the knowhow of the control authorities, in particular as regards the risk profile of chain partners, which is an important element for the design of an efficient monitoring plan;
- Co-operation between all interested parties in case of feed safety incidents is required; this should involve operators of the sectors at stake and their organisations, as well as control authorities and EU decision makers; this allows both operators and authorities to react more rapidly in case of incidents, in particular to measure the magnitude of a problem so as to adopt the most appropriate, proportionate risk management options and corrective measures.
- Further harmonisation of feed safety standards will contribute to secure imports of feed from third countries, as well as imports of animal products fed in third countries; with a significant dependency on the global market for protein sources and feed additives, the promotion of EU standards and methods for risk management is key to secure EU supply.

## What is FEFAC doing?

FEFAC has developed an action plan based on three pillars: Capacity building, Optimisation of risk management along the chain and Co-operation between operators and control authorities.

### **Capacity building**

- Maintaining European Feed Manufacturing Guide (EFMC);
- Contribution to International Standardisation via the drafting of Technical Specifications concerning PRPs in the feed sector (ISO 22000 series);
- Dedicated meetings with FEFAC member organisations (e.g. with Southern, Central and South-Eastern EU countries);
- Monitoring of feed safety incidents, facilitation of information sharing and assistance to national associations where required via the FEFAC Feed Safety Incident Management Team;
- Inventory, characterisation and dissemination of existing best practices / tools for risk analysis, including Feed Safety Assurance Schemes, collective monitoring systems and contaminant databases;
- Facilitation of exchanges among database owners.

### **Optimisation of risk management along the chain**

- Information exchange with key EU organisations of suppliers on feed safety (FEFANA, COCERAL, FEDIOL, Copa-Cogeca, etc.);
- Assessment of suppliers guides to good hygiene practice;
- Encouraging interaction and exchange among feed safety assurance scheme owners on risk analysis and monitoring programmes;
- Develop relevant professional recommendations regarding the sourcing of safe feed ingredients.

### **Co-operation with authorities**

- Co-ordinating data collection from contaminant databases owners, in particular on emerging hazards;
- Co-ordinating transmission of information from the chain to authorities in case of incidents;
- Support to DG SANTE Directorate on “Health and Food audits and analysis” to foster dialogue among national control authorities and with industry;
- Inventory and promotion of good practices for co-operation between operators and control authorities.