

**European Union comments on  
Codex Circular Letter CL 2010/08 - CAC**

**Subject: Report of the electronic Working Group on Animal Feeding (to be considered at the 33<sup>rd</sup> Session of the Codex Alimentarius Commission)**

**1. Background**

This document is the response of the European Union and its Member States (EUMS) to Codex Circular Letter CL 2010/08-CAC of March 2010 requesting comments on the report of the Electronic Working Group on Animal Feeding. The deadline for comments is 15 May 2010.

The EUMS would like to thank Codex and the electronic Working Group, in particular its host and co-chair countries, for their substantial efforts in undertaking this work which has resulted in some extremely valuable outputs with limited resources used.

**2. Overarching statement and review of existing documents.**

The EUMS support the overarching statement in the report. It is necessary to clarify that the Codex documents reviewed apply to both feed and feed ingredients as they impact food safety. It is also necessary to clarify that the term "food chain" includes feed inputs. It is also important to clarify that the terms "animal feed" and "feed" when used in Codex Alimentarius texts refer only to feed for food producing animals and that feed for pet animals are outside the scope of Codex Alimentarius. It is also essential to clarify that feed trade as such is outside the scope of Codex Alimentarius, without prejudice to the statutes of Codex Alimentarius<sup>1</sup>.

The overarching statement and the suggestions for modification of the reviewed Codex documents should be sent for consideration to the relevant existing Codex Committees (CCCF, CCRVDF, CCFA).

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<sup>1</sup> Section I –Foundation Texts and Definitions, Statutes of the Codex Alimentarius Commission, Procedural Manual, Eighteenth Edition, Rome, 2009.

### **3. Amending and adding new definitions to the Procedural Manual**

The EUMS support the transmission of the proposed amendments and new definitions in the report to the Codex Committee on General Principles and the relevant existing committees for endorsement. The information to be sent should include the report of the electronic Working Group.

### **4. Coverage of residues of different feed additives within the Codex definitions of contaminants or food additives**

This matter requires further consideration.

### **5. Overview of all Codex documents related to feed**

This additional task mentioned during the deliberations of the electronic Working Group, namely to prepare an overview document of all Codex documents related to feed. This would focus on whether all aspects of food safety risk analysis relating to feed addresses food/feed production, use, hygiene, and whether it needs further consideration. The Codex documents and the Code of Good Animal Practice will clearly form the main basis of the review, but there may be other additional documents relevant to animal feeding and thus an overview document along the lines we are suggesting could prove to be most useful.

### **4. Suitable and specific mechanisms for addressing the identified tasks**

The EUMS believe that the identified tasks should be addressed as soon as possible in an appropriate manner. The EUMS have stated in the past that a time limited ad hoc Codex Task Force on Animal Feeding is a suitable mechanism in particular, in those areas where Codex has not started work on feed. The Task Force would allow considering all identified feed related issues in a holistic manner and would make efficient use of the available expertise and resources at its disposal. However, the EUMS could consider assigning permanently all future tasks relating to animal feeding to an existing Codex Committee and are of the opinion that if such an approach is followed, then the Codex Committee on Contaminants in Foods (CCCF) would be the most appropriate body as its terms of reference already contain provisions in relation to feed. The CCCF has already finalized work on animal feed, for instance on melamine, most incidents with animal feed to date concerned contaminants, and the gathered experience would benefit the work in other feed areas. Moreover, the expertise would still be centralized, facilitating the participation of feed experts.