

Official controls in feed establishments concerning Reg. (EU) Nr 999/2001

Checks and controls with regards to feed ban requirements in feed establishments

Drs. K. Zwaagstra Dutch Consumer Product Safety Authority16-9-2015



Team Animal Feed and Animal Byproducts Dutch Consumer Product Safety Authority NVWA

- In 2015 we inspected 43 plants (mostly fishmeal related).
- Inspections 999/2001 are once a year.
- Inspections are combined with other inspections.
- Re-inspections asap but at the least after 4 months.
- List of approved companies 2014
- Sampling for national plan animal feed



Locations of inspections

- Production locations of ruminant feed.
- Production locations of non-ruminant feed.
- Production location of feed for aquaculture animals.
- Transporters.
- Farmers, mixing of feed for the exclusive use in their own holdings (they use fishmeal).



Points of attention during a control are in particular:

- transport of fishmeal to the plant
- storage of fishmeal at the plant
- operating system of the plant concerning the control and cleaning of storage facilities/ transport prior to use for other purposes
- cross contamination in the production line
- stock management/inventory
- system for tracking and tracing of Animal Proteins (AP's)



Does the plant has the right registration/approval/permission?

At least 3:

- Registration/approval according to 183/2005
- Approval according to 999/2001
- Permission according to 999/2001 (separation of lines)



Which products does the plant purchase regarding Reg. 999/2001

- Fishmeal
- Processed animal proteins
- Di- and tri-calcium phosphate from animal origin
- Blood products or bloodmeal derived from nonruminants



Separation between feedstuffs for ruminants and non-ruminants (1)

Reg 999/2001, Annex IV

- Chapter III, part B, 1 and 2a (use of fishmeal)
- Chapter IV, part D, d, i) (aquaculture)
- Chapter IV, part E, c (fishmeal in milkreplacers)

This applies for the entire production proces!

(production, storage, packaging, bagging, transport (bulk) and administration)



Separation (2)

General rules:

- total separation of establishments for producing ruminant feed and non-ruminant feed
- dedicated establishments for feed for aquaculture

Exception:

Total physical separation of the facilities within the establishment (after permission of the CA)











Regular sampling and analysis of the compound feed has been carried out by the plant?

Total absence of unauthorised constituents of animal origin!

- methods of analysis for the determination are based on Reg. 152/2009.
- the frequency of sampling and analysis shall be determined on the basis of a risk assessment carried out by the operator as part of its procedures based on HACCP principles
- The administration shall be kept available to the competent authority for a period of at least 5 years.

Reg. 999/2001: Ch III, B, c - Ch IV, D, d, i and E, c), iv



NL Policy regarding the occurrence of bone fragments in plant products

Upon the discovery of a bone fragment in plant products intended for feeding ruminants (depending on the status of the bone fragment) we use a PCR technique in order to investigate if it originates from ruminants. Based on the results we decide what to do with the concerning batch.

(Reg 999/2001, Annex IV, Chapter II, point e))



Is the origin of the incoming feedmaterials identifiable and traceable?

Tracking and tracing of the material

- 1. The company checks if the products originate from authorized species or origin?
- 2. The company carries out verification on this?



The fishmeal originates from aquatic animals except sea mammals

- Reg. 142/2011, Annex I, point 7
- Reg. 999/2001, Annex IV, part A, a)
- Reg. 999/2001, Annex IV, part E, a)



The labels and the accompanying commercial document or health certificate, as appropriate are according to 999/2001?

1

- **Fishmeal** and compound feed containing fishmeal and any packaging containing such products must be clearly marked with the words 'contains fishmeal shall not be fed to ruminants'.
- Compound feed containing di/tri Ca phosphates and any packaging of such products shall be clearly marked with the words

'contains dicalcium/tricalcium phosphate of animal origin — shall not be fed to ruminants'.



Labeling (2)

- Of **blood products**, compound feed containing blood products and any packaging of these products must be clearly marked with the words: 'contains blood products shall not be fed to ruminants'.
- Compound feed containing **processed animal protein** shall be clearly marked with the following words: 'processed animal protein derived from non ruminants shall not be used for the production of feed for farmed animals except aquaculture animals and fur animals'.
- milk replacers containing fishmeal, intended for unweaned farmed animals of the ruminant species, and any packaging containing such milk replacers, must be clearly marked with the words:

'contains fishmeal — shall not be fed to ruminants except unweaned ruminants'



Spot-checks of a few labels



Controls on transport (1)

General rule: dedicated transport vehicels and containers

Exception:

Vehicles and containers which have been previously used for the transport of the animal products and feed for non-ruminants and aquaculture listed in 999/2001,

may be used for the transport of feed intended for ruminants and aquaculture provided that they are cleaned beforehand in order to avoid cross-contamination, in accordance with a documented procedure which has been given prior authorisation by the competent authority.

Annex IV, Chapter III, Section A



Controls on transport (2)

In case the company uses own transport facilities, they clean their verhicles and containers according to a approved cleaning procedure,

& keep their transport administration available at the minimum of 2 years?

During intake of material, proof of cleaning and previous cargo's of transportvehicles and containers are checked by the plant?



The company can prove that the suppliers are approved according Reg. 1069/2009?

Info needed for: traceability



Is it possible to track and trace the total available amount of AP's at the plant?

Make a request at the start of the control for a T&T because the company may need some time for it... Check e.g the last quarter in a year:

- •The stock of AP's and the stock of compound feed produced with AP's at the first day
- •The amount of AP's which have been used during this quarter
- •The amount of compound feed (CF) which has been produced with these AP's
- •The stock of remained AP's and CF on the last day



The administration must be kept available to the competent authority for a period of at least five years.

- •Reg 999/2001, Annex IV
- Chapter III, B, 2c
- Chapter IV, D, d, (i), 4th indent
- Chapter IV, E, c, iv



Final judgement

- The omissions identified, are a (in)direct threat to feed safety?
- •Did you have to make specific arrangements with the company?
- •Which action need to be taken for enforcing the law?
- Is a re-inspection necessary?



Inspection results from the last couple of years: the most common infringments:

- No approved control system for cleaning/no cleaning
- Lack of specification sheets from the purchased products regarding 999/2001
- The company cannot demonstrate that the products result from non-ruminants
- The company does not know whether the customers have ruminants at the same location
- Silos/transport facilities are being used since last visit for purposes other than according. Reg 999/2001



Positive:

The tracking and tracing in all companies comply.



List of options for use feedstuff of animal origin.

Relevant Legislation:

Reg. (EG) 999/2001

Reg. (EG) 1069/2009

Reg. (EG) 142/2011

Definitions:

- **Reg. (EG) 142-2011** Annex I contains definitions of rendered fats, fishoil, collagen, gelatin, hydrolysed proteins, PAP's,fishmeal, bloodproducts and catering waste.
- **Reg (EG) 999-2001** Annex I refers to these definitions insofar as this Regulation relates to the products listed.
- <u>Catering waste</u> means all waste food, including used cooking oil originating in restaurants, catering facilities and kitchens, including central kitchens and household kitchens.
- Rendered fats and fishoil: according to Reg. (EG) 183-2005 these products must be monitored for <u>Dioxine</u>.



Gebruik in voeding voor...

Voedermiddelen of mengvoeders die deze producten bevatten:	Herkauwers	Niet-gespeende herkauwers	Niet-herkauwers	Aquacultuur- dieren	Vleesetende pelsdieren	Gezelschaps- dieren
Gesmolten vetten/ visolie	Zie 1	Zie 1	Zie 1	Zie 1	Zie 1	Zie 1
Melk, biest en producten pf derivaten o.b.v. melk of biest						
Eieren en eiproducten						
Collageen en gelatine	Zie 2	Zie 2	Zie 2	Zie 2		
Gehydrolyseerde eiwitten	Zie 3	Zie 3	Zie 3	Zie 3		
Di- en tricalciumfosfaat (dierlijke oorsprong)			Zie 4	Zie 4		
Verwerkte dierlijke eiwitten m.u.v. vismeel				Zie 5		
Vismeel		Zie 6	Zie 7	Zie 8		
Bloedproducten			Zie 9	Zie 9		
Plantaardige voedermiddelen met botfragmenten	Zie 10	Zie 10	Zie 10	Zie 10	Zie 10	
Voormalige voedingsmiddelen	Zie 11	Zie 11	Zie 11	Zie 11	Zie 12	Zie 13
Keukenafval en etensresten cat. 3					Zie 12	



Legal basis of prohibitions:

Reg. (EG) 999/2001, art 7, 1 and 2

Reg. (EG) 999/2001, Annex IV, Ch 1

Reg. (EG) 1069/2009, art 11, 1 a, 1 b and 1 d

In the NL: penalisation is regulated in in the legal act 'Animals'

