



GMP+ Feed Safety Assurance scheme

Feed Materials Cultivation

GMP+ B6

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INDEX

| | | |
|----------|--|-----------|
| 1 | INTRODUCTION | 4 |
| 1.1 | GENERAL | 4 |
| 1.2 | STRUCTURE OF THE GMP+ FEED SAFETY ASSURANCE SCHEME | 4 |
| 1.3 | SCOPE AND APPLICATION OF THIS STANDARD | 5 |
| 1.4 | THE STRUCTURE OF THIS STANDARD | 6 |
| 1.5 | EXCLUSION OF REQUIREMENTS | 6 |
| 2 | NORMATIVE REFERENCES | 7 |
| 2.1 | GMP+ DOCUMENTS | 7 |
| 2.2 | LEGAL COMPLIANCE | 7 |
| 3 | TERMS AND DEFINITIONS | 8 |
| 4 | MANAGEMENT RESPONSIBILITY | 9 |
| 5 | MANPOWER AND MATERIALS | 10 |
| 5.1 | BIRDS, PETS AND VERMIN | 10 |
| 5.2 | MAINTENANCE OF RECORDS | 10 |
| 6 | PROCESS CONTROL | 11 |
| 6.1 | CULTIVATION | 11 |
| 6.2 | HARVEST AND MILLING | 12 |
| 6.3 | STORAGE | 13 |
| 6.3.1 | Storage at own company | 13 |
| 6.3.2 | Storage at third parties | 13 |
| 6.4 | SIMPEL PHYSICAL HANDLING OF OWN CROP | 14 |
| 6.4.1 | Drying | 14 |
| 6.4.2 | Silage / making bales | 14 |
| 6.5 | TRANSPORT | 15 |
| 6.5.1 | Own delivery | 15 |
| 6.5.2 | Delivery by third parties | 16 |
| 7 | AGRICULTURAL CONTRACTORS | 17 |
| 8 | EMERGENCIES | 18 |
| | APPENDIX 1: RELEVANT FEED LEGISLATION | 19 |
| | APPENDIX 2: PERMITTED FUELS | 22 |
| | APPENDIX 3: FORBIDDEN FUELS | 23 |
| | APPENDIX 4: OBSERVATION REPORT FORM | 24 |

1 Introduction

1.1 General

The GMP+ Feed Safety Assurance Scheme (GMP+ FSA scheme) was initiated and developed in 1992 by the Dutch feed industry in response to various more or less serious incidents involving contamination in feed materials. Although it started as a national scheme, it has developed to become an international scheme that is managed by GMP+ International in collaboration with various international stakeholders.

The GMP+ FSA scheme is a complete scheme for the assurance of feed safety in all the links of the feed chain. Demonstrable assurance of feed safety is a 'license to sell' in many countries and markets and participation in the GMP+ FSA scheme can facilitate this excellently.

The basic principle of the GMP+ FSA scheme is that the feed chain is part of the food production chain. Proper quality assurance of feed safety throughout the feed chain has a high priority. It is important that companies take their responsibilities in this respect by responding in a proper and convincing way to the need for safe feed materials in the food production chain.

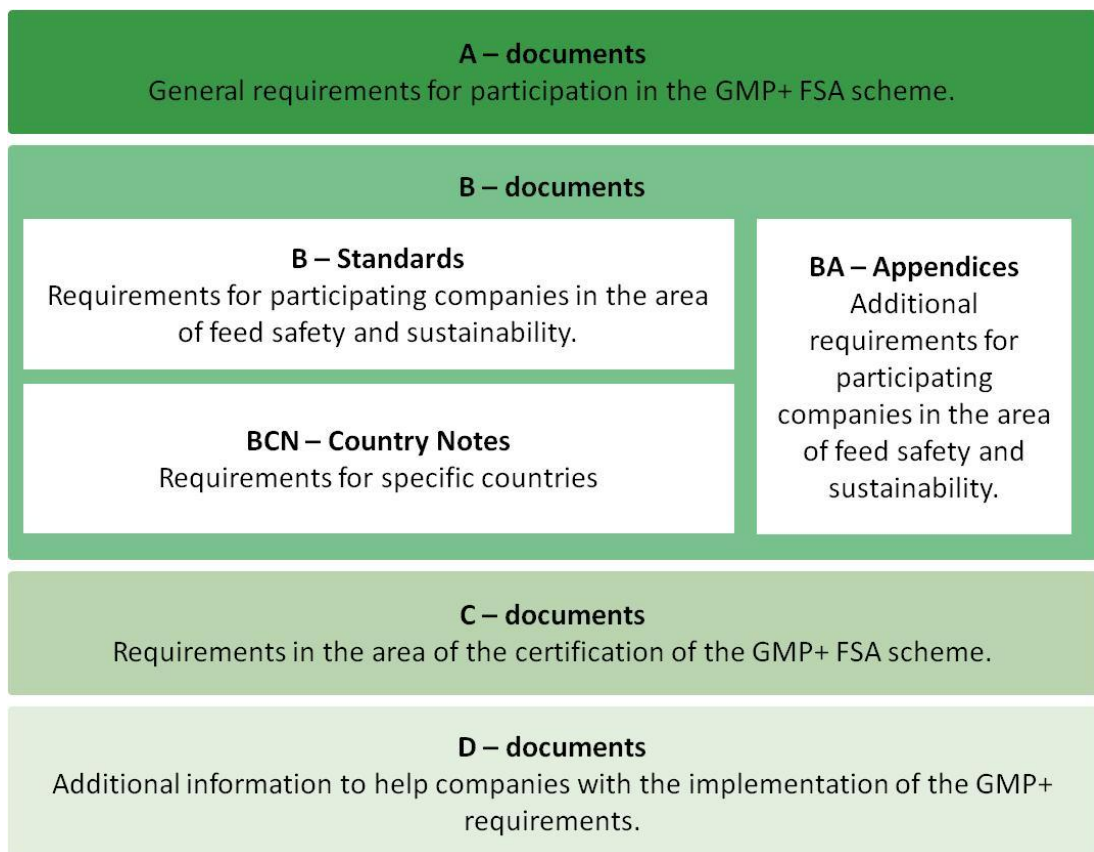
Based on needs in practice, multiple components have been integrated into the GMP+ FSA scheme, such as requirements for the quality management system (ISO 9001), HACCP, product standards, traceability, monitoring, prerequisites programmes, chain approach and the Early Warning System.

Together with the GMP+ partners, GMP+ International transparently sets clear requirements so that feed safety is guaranteed and certification bodies are able to carry out GMP+ certification independently.

GMP+ International supports the GMP+ participants with useful and practical information by way of its various databases, newsletters, Q&A lists and seminars.

1.2 Structure of the GMP+ Feed Safety Assurance scheme

The documents within the GMP+ FSA scheme are subdivided into a number of series. The next page shows a schematic representation of the contents of the GMP+ FSA scheme:



All these documents are available via the website of GMP+ International (www.gmpplus.org).

This document is referred to as GMP+ B6 *Feed Materials Cultivation* and is part of the GMP+ FSA scheme.

1.3 Scope and application of this standard

This standard contains the conditions and requirements for the feed safety assurance of cultivation of feed materials

The requirements of this GMP+ standard apply to:

- a. businesses which produce primary products (feed materials) for (sale to) businesses which intend the products for use in feed
- b. businesses which produce primary products (feed materials) for feeding to animals within their own company.

By primary production is understood: *all activities which take place at the primary company from sowing to harvesting and associated actions such as the transport, storage and use of primary products at the place of production and the transportation with a view to delivery of primary products from the place of production to the customer.*

This also includes simple physical treatments such as drying, silage and chopping. This is referred to hereafter as 'primary production'.

The requirements of this standard apply to organisations, irrespective of their type or size, which carry out activities which are covered within the scope of this stan-

dard. It is not important whether a company carries out these activities on its own account or as a (sub) contractor ('service provider').

Each participant must establish the company-specific hazards relating to the safety of feeds and analyse and control them by applying HACCP principles. This standard describes as accurately as possible for activities or feeds which are covered within the scope of this standard what the requirements are with respect to the various risks and what the associated control measures are. A participant may make these control measures part of a prerequisites programme or may implement them as specific measures for controlling a particular critical control point. This standard also provides requirements for inspections and audits.

If a participant carries out activities with feeds which are outside the scope of this standard then it may be necessary to apply another GMP+ standard instead of, or in addition to, this standard.

For exact details is referred to *GMP+ C1 Approval Requirements and Procedure for Certification Bodies*, Appendix 1

The participant remains responsible at all times for the safety of the feeds and activities associated with them, as well as for checking on compliance with the requirements. This must be done by the participant himself. By complying with the requirements of this standard and by being certified accordingly, the participant can demonstrate the safety and quality of his services or feeds to third parties.

Irrespective of the obligations arising from this standard, the participant will only place on the market feeds which are healthy, sound and of normal trading quality.

The participant may not introduce any feeds to the market which represent a danger to the health of humans or animals or to the environment. The participant must also avoid introducing feeds into the market in a way which could be in any way misleading.

1.4 The structure of this standard

This standard is structured in a specific way.

GMP+ Appendices (GMP+ BAxx), to which there are also references, are separate GMP+ documents within the B series which are not attached to this standard. If there is a reference then it applies within the framework of this standard. See also Chapter 2.

1.5 Exclusion of requirements

It is possible that certain requirements do not apply to a participant. A participant may exclude these requirements. Exclusions must, however, be justified and recorded. The exclusions may in any event not lead to the participant supplying feeds which do not comply with feed safety as defined in the GMP+ FSA scheme.

No requirements may be excluded because the participant finds them to be not relevant such as because customers do not ask for them or because compliance with these requirements is not a legal obligation or because the company is small.

2 Normative references

2.1 GMP+ Documents

In addition to the requirements listed in this GMP+ standard, the participant must also comply with the requirements included in the GMP+ Appendices (GMP+ BAxx) to which reference is made in this standard.

The participant must also comply with the relevant requirements as recorded in the GMP+ A-documents.

These documents can be found on the GMP+ International website (www.gmpplus.org)

2.2 Legal compliance

Special attention was paid when drawing up this standard to the inclusion of the relevant requirements in the feed legislation. Compliance with this standard does not however guarantee that there is compliance with all the legal requirements or mean that feed legislation can then be ignored. It is the participant's own responsibility to comply with the relevant feed legislation.

3 Terms and definitions

| | |
|--|--|
| Simple physical handling | Examples are the following operations or treatments: drying, cleaning, silage, making bales/packaging, chopping. |
| GMOs | A genetically-modified organism |
| Plot | is a piece of agricultural land intended for the cultivation of a crop with the same crop treatment, provided with a unique name or plot code. This is also the unit for which details are recorded (registration unit). |
| Primary production of feeds (see 183/2005) | the production of agricultural products including cultivation, harvesting, milking, breeding of animals (prior to slaughter) or fishing where only products are obtained which are not subject to any other treatment after harvesting, collection or catching than a simple physical handling. |
| Farm | The farm where the crops are cultivated. This is usually an agricultural farm. This also include the activities which are carried out by third parties (for example agricultural contractors) for this grower in agricultural cultivation, harvesting, simple physical handling (for example drying, silage / bales, beating, chopping, etc.), transport and storage for which this grower is responsible. |
| Grower | The primary producer of the agriculturally-cultivated crops. |

4 Management responsibility

The primary producer must always be aware of his responsibility for the safety of the primary product being cultivated during the period in which he grows the products on his farm, harvests them and stores, keeps, subjects them to simple treatment and delivers them. The primary producer must be aware that he is the first link in the feed chain and is also part of the food production chain.

The primary producer should ensure that activities are controlled and carried out such that hazards which could impinge on feed safety are eliminated or kept to a minimum.

The primary producer also ensures that, to the extent possible, primary products which are produced, prepared, cleaned, packaged, stored or transported under his responsibility are protected against contamination and decay.

By implementing the requirements from this GMP+ standard he is showing that feed safety is being assured in accordance with the Feed Hygiene Regulation.

5 Manpower and materials

5.1 Birds, pets and vermin

The company should prevent the presence of domestic animals, birds, vermin and insects and their excreta. The company should take the following control measures into consideration in this respect:

- a. Prevent contact between birds and domestic animals and their excreta and the stored product, as well as their nesting among it (including closing doors and windows and covering the product);
- b. Prevent vermin through the use of mesh screens at inlet and outlet hatches;
- c. Stocks of pesticides should be stored separate from the product ;
- d. Place traps for vermin if necessary (in safe places).

5.2 Maintenance of records

The primary producer will maintain records of the measures taken to control hazards.

In addition, feed materials should be traceable from the purchase of the raw materials (including auxiliary substances such as crop protection agents, fertilisers, etc.) through to sale, including transportation.

The primary producer must record the following information in his administrative system, as a minimum:

- a. which plots are used for the primary production of foodstuffs and feed materials for the feed sector **(for example: Area application = McSharry application)**;
- b. The source and quantity of each feed and feed additive (such as silage agent) that may enter the farm **(For example: Tax records)**;
- c. The use of (genetically-modified) seed **(For example: Tax records)**;
- d. Purchased crop protection agents and biocides **(For example: Tax records)**;
- e. Purchased fertilisers **(For example: Tax records)**;
- f. for each crop (by plot if necessary), the date of treatment, the treatment used (including quantity and type of crop protection and fertiliser agent) as shown in the farm's own administrative records, **(for example their Crop spraying book)**
- g. names of customers and quantity of product delivered **(for example: the tax records)**
- h. The presence of diseases which could threaten the safety of the primary products
- i. Records of checks and inspections and also analysis results and certificates.

The storage period for records amounts to at least three years unless a longer storage period is required under legal or other regulations. The documents should be kept in such a way that they are easily accessible and can be made available to the competent authorities on request.

6 Process control

6.1 Cultivation

a. Selection of raw materials

1. In grain cultivation preferably use 100% decontaminated seed (to prevent moulds).

b. GMOs

1. Cultivation of GMO varieties is permissible only where these meet the legal requirements;
2. the use of GMO varieties is to be agreed with the customer / service provider;
3. maintenance of records of GMO varieties used (see 5.2).

c. Plot

1. Cultivation on contaminated plots is prohibited (for example sludge, glass, oil, dioxin, heavy metals, etc.). Mandatory removal of contaminants (extra attention to glass and plastic, plots alongside roads);
Indisputable history of the use of the plot. This means:
2. no cultivation on plots which have been contaminated in the last three years by the production of prohibited substances. In case of doubt relating to the history of the plot, the soil should be analysed for, among other things, heavy metals by a laboratory certified in the soil investigation field (e.g. Oosterbeek);
3. if a plot has been in Agricultural use for less than 5 years then the history of the plot must be known for the last 7 years and supported by soil analyses by a certified laboratory in the field of soil investigation (e.g. Oosterbeek).

d. Use of crop protection agents / grain decontamination agents / biocide

1. Use only legally registered agents, with permission for
The crop in question (**checking of agents is possible at: www.ctb-wageningen.nl**)
2. Apply the agents in accordance with the legal prescription and the instructions on the packaging;
3. Maintenance of an administrative system of the agents used (including after harvest (see 5.2), as specified in their own administrative system (**For example: the spraying book**);
4. Make use of a properly adjusted and properly operating spray and, if applicable, an approved nozzle and spraying permit.

e. Fertilisers

1. Follow fertiliser recommendations (preferably by means of analysis results);
2. for GFT compost, compost from roadside cuttings, purification sludge and/or black soil there must be an analysis report in accordance with Article 8 of the BOOM decisions¹ and proof of delivery, so that there is no case of contamination with heavy metals in excess of the legally permitted level.
And analysis shows that the product is virtually free of glass; Glass norm: maximum 0.2% (m/m, by dry substance) and a maximum particle size of 20 mm.

1. Decision on quality and use of other organic fertilisers. This decision is Dutch legislation implementing European Directive 86/278/EEG.

3. *use of fertilisers on the basis of animal proteins is not permitted. On the plot there may have been none of the specified fertilisers in the last 3 years;*
4. *make use of a properly operating and, if necessary, approved spreader;*
5. *maintain administrative records of the fertilisers used (see 5.2) (for example the tax records).*

f. Fungal infections

In the event of the presence of (fungal) infections the primary producer should:

1. *Make a note in his administrative records (see 5.2) and*
2. *inform the customer / service provider.*

g. Undesirable substances

1. *Report any contamination with weed seed, false flax or black mustard to the customer / service provider;*
2. *remove green potato's.*

h. Water

1. *Only use (rain)water of good quality; well, mains and rain water is presumed to be clean;*
2. *surface water that is used for crops must be clean.*

In the event of uncertainty about the suitability of the surface water

The company should obtain information from the competent authorities (Water-board or Plants Disease Service). The company should be aware that a sewer flood in the event of an unusually large rainstorm can seriously contaminate the surface water.

6.2 Harvest and milling

Damage to the product during harvesting and milling and the introduction of foreign materials (such as glass, stones, machine parts due to wear, GMO products should be prevented by:

- a. *Only make use of well-maintained, clean machines, transportation and storage facilities (kippers, boxes, etc.)*
- b. *No use of faulty means of transport (including oil and fuel leakages or broken glass)*
- c. *No use of faulty storage facilities (kippers, boxes, etc.)*
- d. *Cover products in the event of rain. Mandatory use of tarpaulin on kippers and grinding equipment if rain is threatened.*
- e. *No use of machines which were in contact during the season with GMO products unless they have been thoroughly cleaned.*

6.3 Storage

6.3.1 Storage at own company

Where products are placed in interim storage prior to delivery, the company layout should be such that loss of quality, cross-contamination and/or (hazardous) contamination is prevented.

This means:

General:

- a. *Storage must take place in clean and dry areas (clean storage area all year round)*
- b. *Storage area must be properly maintained (roof, walls, etc.)*
- c. *No use of broken wooden boxes, broken planks in walls to be replaced*
- d. *Storage area should be clearly separated from machinery stores and the workshop*
- e. *If lights are above the stored product then the protective plate must be present, the lights must be shatterproof or there must be plastic foil*
- f. *Use shatterproof thermometers without mercury*

GMO

- g. *No use of storage areas or boxes in which GMO products have been placed during the growing year unless very thoroughly cleaned*

Heating:

- h. *Aim for optimum climate control*
- i. *Condition product sufficiently (temperature, damp, ventilation)*
- j. *Prevent condensation and mould (due to the possible formation of mycotoxins), watch product quality*
- k. *Well-maintained cooling equipment provided with a STEK report, must have a cover plate above the product*

Waste and toxic materials

- l. *Store waste and toxic materials (including crop protection agents, cleaning agents, pesticides, fertilisers, etc.) separately from the product*
- m. *Preparation of these toxic materials not to be in the vicinity of the harvested product*

6.3.2 Storage at third parties

Note: The requirements in this section are not requirements from the Feed Hygiene Regulation but are part of the GMP+ Feed Safety Assurance scheme. No approval will be requested for these sections from the Dutch Minister of Agriculture.

Products which are not placed into interim storage on the own farm must be stored by a business which

- n. *Is certified for GMP+B1, GMP+B5 or GMP+B6, or*
- o. *Is certified in accordance with an equivalent scheme*

A copy of the certificate should be present in the administrative records. For GMP+ FSA certified companies this is not necessary if the company is included in the GMP+ International companies database, see www.gmpplus.org

6.4 Simpel physical handling of own crop

6.4.1 Drying

- a. *Specification of the quality of the fuels as well as the agreements with the suppliers, on the basis of a risk assessment. The basic assumption is that fuels demonstrably contain no undesirable substances which may enter the feed material (in the event of direct drying). In principle only fuels such as those in appendix 2 are acceptable. All other fuels are not permitted unless it is shown by way of a risk analysis that there is no risk to the safety of the feed material. In any event the fuels in appendix 3 are not permitted.*
- b. *Specification of control measures to prevent contamination of fuels during storage and transport*
- c. *Specification of checks on the quality of the fuels*
- d. *Specification of the settings for the burner and dryer installations so as to prevent the formation of undesirable substances.*

6.4.2 Silage / making bales

If the silage takes place under the responsibility of the grower then at least the following control measures should be taken into consideration:

Silage must be done properly to achieve the best possible silage quality.
Heating (mould) should be prevented.

General silage quality:

- a. *The pH is a good indicator of silage quality, the target value lies between 4.5 and 5.4 but depends on the silage circumstances*
- b. *The silage contains as little oxygen as possible to impede the growth of moulds*
- c. *If the sugar level is too low, the silage is too wet or too dry then the additives to retard heating may be added to the silage (sugars, salt, micro-organisms, ureum). Only silage agents may be used which are permitted, see EU Reg. 1831/2003. See Group 1K of the list of permitted feed additives which can be consulted via <http://europa.eu.int/comm/food/food/animalnutrition/feedadditives/registeradditives> .*

Silage and coverage

- d. Use sufficient foil*
- e. To prevent damage to the plastic use protection (for example a protective canvas or soil)*
- f. Check the plastic regularly for damage and repair if necessary*

Removal:

- g. Removal of places with visible heating or mould-forming*
- h. Limit the storage period of feed removed from the silage (maximum 1 week, preferably 2-3 days); for example by removing less material from the silage each time.*

Storage of packaged bales (such as grass seed straw):

- i. Preferably on a hardened surface (especially on non-soil surfaces)*
- j. Use sufficient foil layers*
- k. Take precautionary measures not to damage the foil in transport (for example the use of a special bale clamp)*
- l. Prevent damage by birds by, for example, covering the bales with a net This applies particularly if there is a nuisance from birds*
- m. Regular checking of the packaged bales (check round about). If there are visible, accessible holes in the foil of the packaged bales then repair them.*

6.5 Transport

6.5.1 Own delivery

Ingress of water and contamination by bird droppings must be prevented. In addition, the load space and the technical tools on the transport used must be clean. This means:

- a. The load must be covered during removal from storage and transportation to the customer*
- b. Remove all products which do not meet the requirements of this GMP+ standard on delivery*
- c. Only clean and properly maintained equipment must be used which is:
 - 1. free from residues and odour from previous loads*
 - 2. free from residues from cleaning and/or disinfection agents*
 - 3. dry.**
- d. The primary producer is responsible for this and for supervision of loading of the correct batch.*

Cleaning of the transport (including vehicle / equipment / packaging) must take place in accordance with the following cleaning and decontamination regime:

Following transport of:

| Product | Cleaning instruction |
|--------------------------------------|---|
| a. <i>animal feed raw materials:</i> | <i>sweeping</i> |
| b. <i>packaged products:</i> | <i>sweeping</i> |
| c. <i>earth/stones:</i> | <i>high pressure water cleaning</i> |
| d. <i>artificial fertilisers:</i> | <i>clean with water</i> |
| e. <i>Dry stackable fertiliser</i> | <i>cleaning and disinfection</i> |
| f. <i>Wet fertiliser</i> | <i>cleaning, disinfection and release after external inspection by an ISO17020-accredited inspection agency</i> |

6.5.2 Delivery by third parties

Note: The requirements in this section are not requirements from the Feed Hygiene Regulation but are part of the GMP+ Feed Safety Assurance scheme. No approval will be requested for these sections from the Dutch Minister of Agriculture.

Where the transport is provided on the orders of the primary producer by an external (transport) company, this company must demonstrably meet the standards contained in the GMP+ standard for transport.

- a. *The transport company must have a GMP+ International certificate, and*
- b. *a copy of this must be held in the primary producer's administrative records. This is not necessary if the transporter is included in the GMP+ International Company's database, see www.gmpplus.org.*

7 Agricultural contractors

The work carried out by an agricultural contractor should be carried out in accordance with the following requirements or by an agricultural contractor who is certified under the Feed Quality Contracting standard (VKL).

- a. *The primary producer is responsible for ensuring that the contractor works in accordance with the requirements, and must supervise this*
- b. *The administrative records must show what work (activities and date) has been carried out by the contractor;*
- c. *The primary producer is responsible for ensuring that the same records are kept to cover the contractor's activities.*

If use is made of VKL-certified contractors then:

- d. *a copy of the VKL certificate should be present in the administrative records of the primary producer. This is not necessary if the contractor is specified on the site www.vkl.nl.*

8 Emergencies

In the case of emergencies on the farm or in the immediate environment, the risks to the feed materials must be assessed.

In all cases the business must:

- a. *Record what has happened in the case of fire, accidents or the discovery of possible asbestos, glass, oil, chemicals, radioactivity, organisms subject to quarantine etc.*
- b. *Take corrective measures*
- c. *record the corrective measures taken.*
- d. *Report the emergency to the GMP+ International using the form in appendix 4 and discuss whether this has consequences for the batch in question*
- e. *Consult the reporting indicator of the VWA (Dutch Food and Consumer Product Safety Authority, see www.vwa.nl) for whether a report must be made.*

Appendix 1: Relevant feed legislation

1. Introduction

Under the GMP+ Feed Safety Assurance scheme, primary producers, among others, are asked to comply with the requirements which apply to them in the feed legislation which are related to the safety of humans, animals and the environment.

2. Types of legislation

The feed legislation is largely a conversion of rules which are set at the EU level. This legislation has now mostly been incorporated in the so-called Dutch Animal Feed Outline Act. This act falls within the competence of the Ministry of Agriculture, Nature and Food Quality which is the competent authority. To a large extent the EU legislation for the feed sector is based on the General Food Law. There are also various Community veterinary regulations which also apply to the feed sector. Because it is not feasible to summarise all the relevant national legislation, only the European legislation will be specified in this document. A distinction has been made between, on the one hand, directives and, on the other hand, regulations and decisions. Decisions and regulations have a direct effect and are binding from their effective date. Directives, on the other hand, must in principle first be converted into national legislation by national governments.

3. Changes to legislation

Existing European legislation is regularly changed. These changes are made by way of amending regulations, amending directives and amending decisions. This amending legislation never contains the new, complete section of law but usually contains just information about what has changed and where in which legislation. It is therefore up to the user to read in all relevant changes to the original text. Use can be made for this of so-called consolidated sections of law in which these changes have been incorporated. These consolidated versions have, however, no official status and are generally not updated to include the latest change to the law. An indication is given, however, at the beginning of the consolidated text of which changes have been incorporated. For the sake of clarity only the original legislation is specified in this document and not the amending legislation.

4. Applicable legislation

Among the relevant community feed legislation related to the safety of humans, animals and the environment must in any event be counted the following regulations and decisions.

| <i>Number</i> | <i>Subject indication</i> | <i>Official title</i> |
|------------------------|---------------------------------------|---|
| 178/2002 | General Food Law | Regulation (EC) no. 178/2002 of the European Parliament and the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety |
| 183/2005 | Animal Feed Hygiene Regulation | Regulation (EC) no. 183/2005 of the European Parliament and the Council of 12 January 2005 laying down requirements for feed hygiene |
| 1831/2003 ¹ | Feed additives (incl. silage agents) | Regulation (EC) no. 1831/2003 of the European Parliament and the Council of 22 September 2003 on additives for use in animal nutrition |
| 396/2005 | Maximum residues of pesticides | Regulation (EC) no. 396/2005 of the European Parliament and the Council of 23 February 2005 on maximum levels of pesticides in or on food and feed of plant of animal origin |
| 2160/2003 | Salmonella control | Regulation (EC) no. 2160/2003 of the European Parliament and the Council of 17 November 2003 on the control of salmonella and other specified food-borne zoonotic agents |
| 767/2009 | Placing on the market and use of feed | Regulation (EC) No 767/2009 of the European Parliament and of the Council of 13 July 2009 on the placing on the market and use of feed, amending European Parliament and Council Regulation (EC) No 1831/2003 and repealing Council Directive 79/373/EEC, Commission Directive 80/511/EEC, Council Directives 82/471/EEC, 83/228/EEC, 93/74/EEC, 93/113/EC and 96/25/EC and Commission Decision 2004/217/EC |
| 2004/217 | List of prohibited feed materials | Decision No. 2004/217/EC of the Commission of 1 March 2004 adopting a list of materials whose circulation or use for animal nutrition purposes is prohibited |

The national animal feed legislation related to the safety of humans, animals and the environment includes, in any event, the national legislation implementing the following directives.

¹ On the basis of article 23 of Regulation (EC) no. 1831/2003, Directive 70/524/EEG has been formally withdrawn. The requirements set in this directive still, however, apply on the basis of article 10 of the regulation, to additives which are put on the market under this directive and which are not yet permitted under the new regulation.

| <i>Number</i> | <i>Subject indication</i> | <i>Official title</i> |
|---------------|---------------------------------------|---|
| 96/25/EG | Circulation and use of feed materials | Directive 96/25/EG of the Council of 29 April 1996 on the circulation and use of feed materials |
| 2002/32/EG | Undesirable substances | Directive 2002/32/EG of the European Parliament and the Council of 7 May 2002 on undesirable substances in animal feed |
| 2003/99/EG | Salmonella Monitoring | Directive 2003/99/EG of the European Parliament and the Council of 17 November 2003 on the monitoring of zoonoses and zoonotic agents |

Appendix 2: Permitted fuels

Permitted are:

1. Gaseous fuels:

- Natural Gas – NG (“Natural Gas”) or CNG (“Compressed Natural Gas”)

2. Liquid Natural Gas – LNG (“Liquid Natural Gas”):

- Bio-gas (“Land Fill Gas”)
- Liquefied Petroleum Gas (LPG or refinery gas)

3. Liquid fuels:

- Petroleum
- Light fuel oil
- Diesel oil
- Heavy fuel oil if it complies with the statutory norms (which are not uniform in Europe).

4. Solid fossil fuels:

- Thermal coal
- Metallurgical coal
- Anthracite
- Coal products for domestic use including briquettes.

5. Bio fuels:

- Non-fossil products of animal or vegetable origin such as straw, (clean) wood chips, coconut husks and cacao shells, bagasse. In some areas (including Brazil) “fuel wood” is grown on a large scale and used in the agro-industry.
These types of fuels can be characterised as vegetable / fibrous / wooden with respect to their structure and composition. If these fuels are clean and dry then the risk is relatively low.
- Vegetable and animal fats

Appendix 3: Forbidden fuels

The following fuels are forbidden on the basis of scientific research into the drying processes

- 1. Petcoke:**
This is a residue of distillation from the petroleum refinery. It is unsuitable as a fuel for direct dryers
- 2. Lubricating oil, engine oil and hydraulic oil:**
These are not intended for use as fuel. Not as such and not as “waste oil”
- 3. Recycling oils (used oils, etc.):**
These are often mixes of unknown origin and with an unknown composition. Deliberate mixing with combustible chemical residues was observed regularly in the past (including the TCR affair).
- 4. Mixed urban waste, mixed industrial waste and dried purification sludge:**
These are and continue to be formally waste products (report “Refuse Derived Fuel; current practice and perspectives, 2003). Member states of the EU may only issue a licence in special cases and for specific purposes to use this as fuel. These waste materials may unintentionally have high levels of persistently contaminating substances. The use of these in a direct way, because of the risks and also from the point of view of GMP and HACCP, may not be tolerated.
- 5. Recycling products:**
These include, for example, preserved wood and demolition wood. Vegetable materials contaminated with preservation agents, insecticides or which are contaminated with oil or chemicals (for example sawdust).

Appendix 4: Observation Report Form

| Observation Report Form | |
|---|--|
| Date and time of the signal: | |
| Reported by: | (contact person, organisation) |
| Telephone number: | |
| E-mail address: | |
| Nature of report: | <ul style="list-style-type: none"> • What has been observed, and what is the context of the problem? • What products or raw materials are involved? • What anomalies, contaminants or hazards have been observed? • Details of the observation? • What is the possible cause, is this confirmed or only suspected? • What other information is available? |
| Origin of the goods: | <ul style="list-style-type: none"> • What is the origin of the goods? • Quantity/size of the batch involved? • Where is the batch at this time? |
| Have products or raw materials already been delivered? | (Information required to implement isolation of the relevant links in the supply chain) |
| What measures have already been taken? | Measure 1: Measure 2: |
| What measures have been taken by the reporter in the short term? | Measure 1: Measure 2: |
| Agreed follow-up action: | (Any follow-up action agreed between the reporter and the staff-member at the reporting centre; when (after what period) will the reporter be called back?) |
| Has there been discussion with others? | If so, with whom? |
| Date: | |
| Signature: | |