

GMP+ Feed Safety Assurance scheme

Evaluatie van het broodmeelin- cident 2003

GMP+ D4.7

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1 Introduction

1.1 General

The GMP+ Feed Safety Assurance scheme (GMP+ FSA) has been developing since 1992. This scheme was been administered from 1992 up until 2009 by the Product Board Animal Feed and, with effect from 2010, this will be administered by GMP+ International.

The GMP+ Feed Safety Assurance scheme (GMP+ FSA) is a complete scheme for assuring feed safety in all the links in the feed chain. It is also a scheme which can be used internationally.

The establishment and development of the scheme was primarily the result of demand from the subsequent links in the feed production chain for better control of feed safety. Another contributory factor was the damage caused by contamination incidents which were more serious and less serious.

In the initial phase the demand arose for better differentiation in an increasingly saturated European sales market for animal products. Since 1999, food safety has been a top issue internationally both politically and commercially because of serious incidents in the feed sector. Because of this, demonstrable assurance of feed safety has become a sales prerequisite.

The basic principle of the GMP+ Feed Safety Assurance scheme (GMP+ FSA) is that the feed chain is part of the animal production column. Proper quality assurance of feed safety worldwide has a high priority. Companies must live up to their responsibilities and respond properly and convincingly to the needs of food production. The GMP+ Feed Safety Assurance scheme (GMP+ FSA) is an aid to the realisation of this.

1.2 Structure of the GMP+ Feed Safety Assurance scheme

The documents within the GMP+ Feed Safety Assurance scheme (GMP+ FSA) are subdivided into a number of series. A diagram follows of these:

A
General (framework) documents

These documents contain the requirements for participation in the certification scheme for companies and certification bodies (framework regulation, the use of logo's, etc.). This series also includes a general list of definitions and abbreviations.

B
Normative documents

These documents contain the international standards and additional country notes for use by companies with respect to the various feed products and production phases including cultivation and industrial production, treatment and processing, collection, trade, means of transport, storage and transshipment.

C
Certification requirements

These documents contain the Rules of Certification including those for the approval of certification bodies and auditors, the frequency of audits, minimum audit time, assessment criteria, checklists, etc. There is also an explanation of how the supervision by certification bodies is implemented and of how GMP+ International supervises the certification process.

D
Interpretations and
accompanying texts

In addition to the above-mentioned normative documents, there are also supporting documents in the D series including a list of frequently-asked questions, manuals and guidance with additional information.

Document	Code	Name
	GMP+ Dx.x	e.g. GMP+ D4.7 Evaluation of the 2003 bread meal incident

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

This document is designated as the standard GMP+ D4.7 *Evaluation of the 2003 bread meal incident* and is part of the GMP+ FSA schema. It is not a norm document but research carried out in collaboration with the Product Board Animal Feed. Use is made in this document of the original text of the report. The information in this research can be used to give a better implementation of the GMP+ FSA norms.

2 Introduction

At the beginning of February 2003, the Dutch feed sector, livestock farming and the processing sectors were confronted with a number of consignments of bread meal containing dioxin which came from a German company. Although it was relatively limited in scope, this incident, following the MPA affair in 2002, once again showed how vulnerable the feed sector and the subsequent links in the animal production chain are.

This evaluation memorandum shows how, during the incident, the discussions and the actions taken by the government and businesses - in as far as the PDV was involved - proceeded.

This evaluation is primarily intended for the board of the Product Board Animal Feed.. It also offers a basis for external support for the action taken by the PDV with respect to the cause of and the approach to the contaminated German bread meal.

3 Facts, actions and results

3.1 TRACK 1 notification, distribution

On 10 February 2003, the Product Board Animal Feed was informed by the Dutch government that, since the beginning of December 2002, bread meal contaminated with dioxin was being brought into the Netherlands from Germany. The bread meal came from the German company Trockenwerk Thüringen GmbH, in Apolda, in the German state of Thüringen. According to reports from the German authorities, the cause was the use of wet woodchips and an incorrect setting for a drying plant from the beginning of December 2002.

This company, which had been drying the bread meal directly since the beginning of December 2002, had problems with the drying plant so that dioxin was able to be created.

The GMP-certified company Velthof Veevoeders BV of Borne had imported 4 batches, in total about 100 tons, of the contaminated bread meal into the Netherlands between the end of December 2002 and the end of January 2003. This company, invoicing in the name of Velthof Export B.V., then delivered about 75 tons of these raw materials (via Cebeco Veevoeders B.V.) to the following compound feed manufacturers: Coöperatie Arkervaart of Markelo, Coöperatie Arkervaart of Nijkerk, Coöperatie de Valk of Lunteren and Olde Elberink of Geesteren.

These compound feed manufacturers had processed most of these batches into compound feeds for various types of animal and delivered these to a total of 142 livestock farms.

In addition, Velthof had delivered a batch of 25 tons directly to the calf fattening company Luyerink (Overdinkel) .

3.2 Initial statutory measures

As a precaution the minister of agriculture, nature management and fisheries adopted, on 11 February 2003, the 'Regulatory Measures for Cattle, Dioxin in Compound Feed' which included a ban on the removal of animals and animal products. This ban applied from 14 February to all livestock farms to which these raw materials or compound feeds had been delivered or where this was suspected.

The Product Board Animal Feed had already imposed a period of temporary restriction order (TBH) on 10 February 2003 under the PDV Regulation for the Control of the Feed Sector 1998 for the bread meal and the compound feeds containing these products which were still available. This initially applied to the feed companies specified above but on 12 February 2003, TBHs were also imposed on the feeds found in the livestock companies.

The blocked feeds which were stored at the livestock farms could be taken back by the compound feed company and the feeds were then blocked again. A total of 25 tons of bread meal and 200 tons of compound feeds was blocked.

Under the applicable legislation the products in question, both the bread meal and also the compound feeds, could not be given as feed. The Product Board drew up a policy guideline at the end of March 2003 for the Removal for Destruction of Contaminated Feed under the PDV Regulation for the Control of the Feed Sector 1998.

3.3 Measures within the framework of the GMP Feed Sector Regulation

On 11 February 2003, the Dutch Animal Feed Inspection Service (KDD) initiated an investigation of the firm Velthof Veevoeders B.V. under the GMP Regulation for the Animal Feed Sector. On the same day, the GMP certification of the company (MH, TV, GH and HACCP) was suspended when it appeared that the supplier of the bread meal had not applied quality assurance worthy of the GMP. From the audit data from the previous year, 2002, it appeared that the German company was at that point not a supplier to the firm of Velthof Veevoeders B.V. was. An investigation was also carried out at Cebeco Veevoeders B.V. This was the broker for the raw materials for the 3 compound feed companies (4 sites).

Investigation at Cebeco Veevoeders B.V. showed that this company had discharged its duty by ensuring that deliveries of products by Velthof Export B.V. had actually taken place under the GMP regime of Velthof Veevoeders B.V. although the invoicing took place via Velthof Export B.V. This was not compliance with the GMP requirements in the formal sense but it was materially and this resulted in a warning to the company involved.

The PDV then published again on the website, on 19 February 2003, the GMP and QC control measures relating to products to be dried and to drying equipment in three languages.

3.4 TRACK 2 notification

On 12 February 2003, it appeared that a number of batches of bread meal and biscuit meal from Trockenwerk Thüringen GmbH in Germany had also been sold in December 2002 via Velthof Veevoeders B.V. in the Netherlands (TRACK 2). It was eventually established that this involved a total of about 125 tons on top of the previous quantity (total 225 tons).

These batches were delivered via Cebeco Veevoeders B.V. to the compound feed manufacturers specified above.

Measures were then taken by the Ministry of Agriculture, Nature and Food Quality so that the removal of animals and animal products was no longer possible from the companies involved. At the same moment the Product Board Animal Feed blocked the feeds at the compound feed companies and at the livestock farms.

Due to this another 95 livestock farms were blocked on 14 February 2003 so that the total number of blocked companies was 237. These included companies with pigs, broilers, mink, ducks and cattle. No dairy cattle farms were involved.

3.5 Release of companies

With effect from 14 February 2003, the blocked livestock farms were partly released on the basis of the analysis results at the compound feed companies for samples of the bread and biscuit meal and the recipe used (8 ng/ TEQ/kg). This initially involved the mink, duck and poultry companies which had obtained feed via the compound feed company Coöperatie de Valk in Lunteren.

The dioxin staff of the Ministry of Agriculture, Nature Management and Fisheries reported that the compound feed companies had not retained the necessary samples. The Animal Feed Inspection Service (KDD) started an investigation into this. On 18 February 2003 it was apparent that the compound feed companies had in fact taken samples of the feeds.

On 18 February 2003, the blocked cattle and calves companies which had received feed via the compound feed company (Olde Elberink) were released on the basis of the analysis findings.

This also applied to a number of companies which had received the mixed feed via the compound feed company Arkervaart (Nijkerk and Markelo). The analysis results for the bread meal varied from 2 to 8.1 ng TEQ/kg

On 18 February 2003, it was clear that on the basis of the dioxin level for the bread and biscuit meal and/or the recipe used that no extra companies could be released. The analysis results for the bread / biscuit meal varied from 5.8 to 11.5 ng TEQ/kg. Only on the basis of trial killings could it be clear whether the dioxin level in the animals was raised or not. It was decided to sample a number of companies (animals) which were representative of the whole group of companies. Based on this, if the dioxin level of the representative company did not exceed the maximum norm, then a whole cluster of companies could be released. No compound feed samples were examined. After all, on the basis of the mixing percentages it could be assumed in these cases that the dioxin levels would go beyond the maximum permitted norm.

A large part of the companies were released in this way between 24 February and 6 March 2003. Finally, at the end of March 2003, the last companies (with sows and piglets) were released.

3.6 Legal procedure against suspension of the GMP certificate

Velthof Veevoeders B.V. has submitted a request (together with Velthof Export B.V.) to the Regulatory Industrial Organisation Appeals Court for a temporary judgement with respect to the suspension of its GMP certification by the Product Board. The hearing was on 7 March 2003 and on 14 March 2003 the preliminary relief court passed judgement (procedure no. AWB 03/225 VV).

In the judgement the preliminary relief court did not allow the the request with respect to the suspension of the GMP certification for trade in feed materials (raw materials). The preliminary relief court was of the opinion that, in view of the fact that feed materials were obtained from a German supplier who did not comply with the QC standard, the Product Board rightly had taken the point of view that there was no compliance (in any event) with that which is stated in Appendix V, sec. 4.6.1 of the GMP Regulation for the Animal Feed Sector. That an ISO certification of the supplier was not sufficient for GMP was, according to the preliminary relief court, apparent from the protocol for GMP equivalence for suppliers of feed raw materials and feed additives. This showed that the GMP requirements were considerably stricter than the requirements for ISO certification. In the opinion of the preliminary relief court, a professional player in the market could be expected to be aware of this difference.

The preliminary relief court saw no basis for the judgement of the company that the PDV should first have instituted a recovery period before proceeding to suspension. The regulation does not oblige the Product Board to do this. Also taking into account that quality assurance of (foreign) suppliers is a significant part of the GMP instructions, the suspension is in the judgement of the preliminary relief court is also not in contravention to the duty of care principle and/or the principle of proportionality.

With respect to the suspension of GMP certification for trade in mixed feeds, for HACCP and for transport, the preliminary relief court was of the judgement that the regulation does not state in so many words that a particular GMP certification also effects all other GMP certifications. The provision in question would only relate to the application for and provision of a certification where there has to be compliance with the GMP requirements for all activities. In view of this and of the fact that it was also not shown that the company had contravened any regulation relating to these certifications, the preliminary relief court decided that the decision to suspend the GMP certificates in question was suspended until six weeks after the day that the Product Board made known the decision with respect to the appeal.

3.7 German government investigation and RASFF report

The first report from the German government came in on 10 February 2003 via the Rapid Alert System Feed & Food of the European Union. At the beginning of December 2002, a routine sample was taken at Trockenwerke Thüringen. The analysis was made available on 15 January 2003; 13 ng/kg was found.

According to the drier in question, a total of 20 tons of contaminated material was involved which was supplied to a pig farm in Hermsted (Thüringen). Trial killings showed 2.1 and 2.6 pg WHO-TEQ/kg fat (norm is 1 pg/kg fat).

Examination of the retention samples by the German authorities finally established on 7 February 2003 that for the whole period from 20 November to 23 December 2002 the dioxin levels in the products supplied were too high.

On 10 February 2003, the German government reported that a total of four consignments of contaminated batches of bread meal of about 25 tons were delivered to the Netherlands in the period between the end of December 2002 and the end of January 2003. Only at a later stage (12 February 2003) did it appear that there were also contaminated batches in that period (total 125 tons) of bread and biscuit meal supplied.

4 Quality assurance system

4.1 Analysis

Various GMP-certified companies were involved in the bread meal incident. The question is why GMP quality assurance was insufficient to prevent this contaminated product from entering the food materials chain (feedingstuff).

There are legal restrictions on the publication of the details of the company involved. Firstly, the Product Board is obliged under the Industrial Organisation Act to handle company-specific data in confidence. Secondly, legal proceedings have been instituted against the Product Board.

The following **observations** can be made:

- a. A raw material was bought by a company at the beginning of the feed chain from a company which had no GMP-level quality assurance of GMP standard for the product.
- b. The 4 feed companies bought the raw material from the company referred to under point a. (GMP-level at the time).
- c. The report of the contamination made by the German government and also by the company involved to its customers was particularly late. At the middle of January 2003, when the very high level was shown in bread meal, the customers for the bread meal ought to have been informed.
- d. The PDV immediately suspended the GMP certificates of the non-GMP-level company within the framework of risk management. The court (Regulatory Industrial Organisation Appeals Court) agreed in a summary procedure to this immediate suspension on the condition that this only applied to raw material trading activities. The suspension which applied to the transport and compound feed trading activity was upheld.
- e. The PDV communicated the essential elements with respect to drying equipment within the framework of GMP risk communication.
- f. Thanks to the presence of a number of samples of the contaminated raw material which were taken on receipt at the compound feed company, it could be established quite quickly using a limited number of analyses and the mixing percentages in the mixing feed which livestock farms should be blocked or that many blocked farms could be released quite quickly. If only the mixing feed samples had been available then it would have taken longer before the analyses were published to enable the release of the blocked companies.
- g. A bottleneck was that not all the UBN (unique company number) numbers of the livestock farmers were present at the feed supplier. A problem was that these numbers were not public and not all livestock farmers wanted to inform their suppliers of them.

- h. In view of the fact that drying equipment such as this is available abroad, it is important that GMP-certified companies do purchase 'blindly' from companies but always make sure that the drying process is quality assured.

Finally, it is important to continue to realise that there are limits to what is possible with a quality assurance system. Not every problem can be prevented by GMP⁺ or HACCP.

4.2 Conclusions

The following can be concluded on the basis of the analysis referred to above:

- a. The incident was not primarily caused by defects in the current system or the standard but by the way in which it was implemented by a participating GMP+ certified company.
- b. The focuses which were chosen in 1999 for the improvement of quality assurance (GMP plus) in the feed sector – application of the HACCP principle and also demonstrable quality assurance in the raw materials chain – are all the more applicable because of this affair.
- c. At one company there was a discrepancy between, on the one hand, the importance attached to quality assurance and compliance with the GMP regulations and, on the other hand, the quality requirements which the market sets for animal products. Because of this it was possible for a raw material for which the risks had not been properly estimated from a non-GMP-level company could get into a closed chain system. It is extremely regrettable that this still occurs even after the lessons learned from the MPA affair in 2002.
- d. The animal feed sector can definitely no longer permit such incidents in view of the very great risks involved for the sales of animal products. In view of these risks, the follow-up actions which were taken on the basis of the MPA affair were proper.
- e. It continues to be important to emphasise that every business in the feed chain puts the required quality assurance into daily practice. This requires not only professionalism but also integrity from businessmen.
- f. The core of this approach is that the animal feed companies only work with known raw materials which are approved on the basis of a risk assessment of the production process and where the source of the risks is known and demonstrably controlled. This requires that each link in the chain has insight into and an assurance of the quality assurance of the supplier(s).
- g. Because there were still raw materials samples available at the companies, a large number of companies could be released at an early stage on the basis of the analysis results and the mixing percentages. It is therefore advisable to include in the GMP standard the obligation for sampling by producers and recipients of feed raw materials. Currently this only applies to critical raw materials.
- h. It is urgently desirable that the regulations (from the Ministry of Agriculture, Nature and Food Quality) make it possible for the feed suppliers to have available the UBN livestock farms in order to link these to their customer numbers. The effectiveness of the measures to be taken can then be increased.
- i. The German authorities reported the dioxin in the bread and biscuit meal at a very late stage. As a result, a lot of compound feed had already been delivered and provided as feed at the livestock farms.

By then attempting to obtain a great degree of transparency, this resulted in unevenly negative media attention and damage to the image of the Dutch feed and animal production sectors. In such cases it is necessary for the government and the Dutch feed sector to publish the facts clearly so that it is precisely clear where the irregularities have occurred and that this does not have consequences for the whole feed sector. In addition it would be good to appeal to the media to observe a degree of proportionality in their reporting.

4.3 Improvement measures

The incident in question confirms the importance of implementing improvement measures relating to the GMP regulation such as those already taken or detailed and implemented within the framework of the MPA affair.

To summarise, the proposed improvements amounted to the following:

- a. Emphasis on the individual responsibility and liability of businesses for the quality assurance of their company products and indemnification from (generic) measures for companies which are not involved in an affair.
- b. Improvement of the effectiveness of quality assurance through the strengthening of requirements where necessary.
- c. Strengthening of preventive and repressive controls and supervision.
- d. Strengthening of the sanctions policy.

In addition, consideration may be given to the following:

- a. inclusion in the GMP regulation of the obligation on producers and recipients to take samples of batches which are supplied or received so that the (precautionary) measures in the subsequent links (blocking of companies) remain as limited as possible
- b. that the Ministry of Agriculture, Nature and Food Quality makes it legally possible in the short term for feed suppliers to obtain the current UBNs in order to increase the effectiveness of the precautionary measures.

5 Meetings of the Ministry, Product Boards and businesses

During the bread meal affair, the PDV was, from 11 February 2003, part of the dioxin staff established by the Ministry of Agriculture, Nature and Food Quality and the General Inspection Agency (AID). The crisis staff informed the involved parties (feed companies and livestock farms) about the measures taken, the blockade and the release of companies. In the summary below the focus is particularly on the involvement of the PDV with the dioxin staff.

Chronological overview of the events related to a report of bread meal contaminated with dioxin, 10 February 2003.

Below, in chronological order, are the actions and developments relating to the report that bread meal had been delivered containing dioxin to 3 compound feed companies and one fattening company. This fact sheet is focused on the Dutch situation.

This sheet is based on collected documents and data.

Date	Document	Development / action
7 February	RVV (National Inspection Service for Livestock and Meat)	The RVV informed one of the companies involved about deliveries (from Germany) of bread meal contaminated with dioxin.
10 February 2003	Report by Dutch authorities	The German company had delivered bread meal contaminated with dioxin to three Dutch compound feed companies and one livestock farmer (fattening steer and rose calves). The German company dried the bread meal using direct drying whereby the flue gases could come into contact with the bread meal. About 100 tons of contaminated bread meal was delivered to the Dutch companies.
10 February 2003	AID trace test	On 10 February 2003, the AID visited the four Dutch companies and took samples from the possibly contaminated feeds.
10 February 2003	PDV	The possibly contaminated batches were blocked. This applied to both the contaminated bread meal and also to the feeds which contained the bread meal.

Date	Document	Development / action
10 February 2003	Meeting with the Ministry of Agriculture, Nature and Food Quality	<p>The following agreements were made.</p> <p>PDV imposed a temporary restriction order on the bread meal and on the feeds. PDV requested the list of customers, the type of feed and the mixing percentage.</p> <p>The animals on the farms which had received contaminated feed were blocked (AID, RVV)</p> <p>The lists of clients (+ UBN numbers) were made known via PVE and COV to the slaughterhouses so that they could block these meat products.</p>
10 February 2003	PDV	At the three compound feed companies and the livestock farm which had received and/or processed the bread meal a temporary restriction order was imposed. The list of customers was also requested.
10 February 2003	Communication	The CKD (Feed Sector Committee for Quality Issues) was informed.
11 February 2003	KDD (Animal Feed Inspection Service)	The KDD initiated an investigation at the recipient of the German bread meal.
11 February 2003	PDV	The certification of the Dutch company which had delivered the bread meal was suspended.
11 February 2003	PDV, LNV	The PDV and the LNV (Ministry of Agriculture, Nature and Food Quality) tried to find out from the German government whether there was really more in the Netherlands (via German traders for example)
11 February 2003	PDV	The customer lists flowed in
11 February 2003	Communication	The CKD (Feed Sector Committee for Quality Issues) was informed.
11 February 2003	PDV	The first provisional list of livestock farms which would be blocked was sent to the slaughterhouses in order to prevent further spreading of products contaminated with dioxin.

Date	Document	Development / action
12 February 2003	PDV, LNV	<p>The PDV and AID customer lists were compared. There appeared to be about 140 livestock farms blocked for the removal of animals and for the contaminated feed.</p> <p>Reports from the suspended Dutch company and the results from the AID and the KDD investigation made it clear that, in December 2002, there were also a number of consignments of bread meal and biscuit meal transported to the Netherlands from the same German company.</p>
13 February 2003	PDV, LNV, AID, VWA, RVV	<p>The release protocol was drawn up and discussed. On the basis of the dioxin results from the contaminated feed materials together with the mixing percentage of the feed material in the compound feed, it could be determined whether the compound feed exceeded the maximum norm or not. The release protocol was discussed on the Friday in the crisis staff</p>
14 February 2003	LNV, PDV	<p>The German government indicated that the December deliveries by the German company may also have been contaminated with dioxin.</p> <p>This bread and biscuit meal was delivered to two Dutch compound feed companies. The meal was processed in compound feed. At the livestock farms the removal of animals was blocked and a temporary restriction order was imposed for the remaining feed present.</p>
14 February 2003	LNV, RVV	<p>The first results came in. It appeared that there was 2.2 ng/kg of dioxin present in the bread meal supplied to the livestock farm. The norm was 0.75 ng/kg. In one of the bread meal samples there was 8 ng/kg present. A calculation could be made on the basis of the mixing percentages of whether companies could be released.</p> <p>It was reported to the crisis staff that not all the compound feed companies had samples in stock. An investigation was started by PDV to see to what extent this report was true.</p>
15 February 2003	LNV, LTO, PDV	<p>An information meeting was to be held in Deventer for the livestock farmers involved. An explanation of the source of the contamination and the actions taken by the LNV, VWA, AID, RVV and PDV. A lot of attention was also to be paid to the release protocol. It was made clear that the feed (bread meal, compound feed) which was to be restricted would continue to be blocked.</p> <p>A number of broiler farms were released.</p>

Date	Document	Development / action
17 February 2003	LNV, AID, PDV	<p data-bbox="703 297 1477 427">A number of duck farms were released. Legal advice was taken on what to do with the blocked compound feed in which there was a raw material with an excess level of dioxin had been incorporated but where the level of dioxin was far below the norm.</p> <p data-bbox="703 472 1477 674">The investigation by the Animal Feed Inspection Service (KDD) showed that at 2 out of the 3 compound feed companies there were samples available of the contaminated compound feeds. The GMP regulation states that a sample must be kept of all compound feeds produced. For raw materials verification must take place of the raw materials (on the basis of the purchasing specifications and the risk analysis).</p>

Date	Document	Development / action
18 February 2003	LNV	<p>A number of livestock farms were released on the basis of the test results.</p> <p>The results for the bread meal in the contaminated 100 tons (1st track) indicated that there was contamination with dioxin in the range 2 to 8,1 ng TEQ/kg.</p> <p>The analysis results for the bread / biscuit meal from the 2nd track (125 tons, December deliveries) varied between 5.8 and 11.5 ng TEQ/kg.</p> <p>Based on the mixing percentages it could be calculated whether the compound feed was under the maximum norm for compound feed. If it was under the norm then the livestock farms could be released as far as the removal of their animals was concerned. The compound feed continued to be blocked.</p> <p>Based on the above, 40 companies were released by 18 February (from both track 1 and track 2).</p> <p>On the basis of the analysis results from a trial killing of calves (which had been fed a lot of the contaminated feed and feed with a high mixing percentage), nine companies were released for the removal of the animals. The compound feed continued to be blocked.</p> <p>In total about another 200 companies would be blocked for the removal of their animals (mostly pig farms) because the bread / biscuit meal was mixed in such a high percentage that the compound feeds eaten by these animals was above the maximum norm.</p> <p>From these 200 companies a selection was made on 19 February 2003 of those companies which had eaten the contaminated feed for the longest time and to the greatest extent. A trial killing was made from these on Thursday, 20 February 2003, and the analysis results were expected on Monday, 24 February 2003.</p> <p>If the results were negative (or remained under the maximum norm for pig meat) then the companies which belonged to that group could be released.</p> <p>The farms where the piglets had eaten contaminated feed could stay as they were. On the basis of a risk assessment (carried out by RIKILT and RIVM) it could be seen that these animals would in time no longer have raised levels of dioxin.</p>

Date	Document	Development / action
19 February 2003	PDV	The Product Board Animal Feed drew up a policy guideline for the removal of locked and recalled feed. The policy guideline was sent to the Ministry of Agriculture, Nature and Food Quality for assessment.
24 February to 6 March 2003	LNV, AID	Blocked farms were being released on a regular basis on the basis of the results of the trial killings.
6 March 2003	LNV, AID	Eight farms remained blocked (with sows and piglets). At a later time, fat samples would be collected from these farms and analysed for the presence of dioxin.
11 March 2003	PDV, LNV	The Ministry of Agriculture, Nature and Food Quality could still not give advice with respect to policy guideline which had been drawn up for the removal of the blocked and recalled compound feed.
13 March 2003	LNV	The Ministry of Agriculture, Nature and Food Quality indicated that due to the characteristics of dioxin (no degradation possible) and the policy that no deliberate contamination could take place of the environment there was only one possibility left with respect to the removal of the contaminated products and this was incineration.
24 March 2003	PDV	The bread meal evaluation was sent to the Feed Sector Committee for Quality Issues (CKD)

Appendix 1 Feed tracks (status 21 March 2003)



