

To the  
President of the Council of Agriculture  
Rue de la Loi  
B-1047 Brussels

21.2.2003  
(03) INST 8

**REGULATION ON OFFICIAL FEED AND FOOD CONTROLS**  
**The way forward to rebuild confidence in the feed&food chain**

Dear President,

FEFAC representing the European compound feed manufacturers has strongly supported the Commission initiative to establish the legal framework for an integrated official feed and food control system. In our view this proposal is a milestone in the new EU policy on feed&food safety.

We would therefore welcome any efforts of the Council Presidency to allow this proposal to move forward as quickly as possible in the co-decision process with the European Parliament.

This approach has the objective to close the “loopholes” in the official feed&food control system, which have been identified in relation to past food and feed safety incidents.

However we would like to draw your attention to the need to extend this approach to the official controls carried out under the EU environmental&waste legislation, since many of the recent feed safety incidences (Dioxins, MPA) originated from environmental or industrial pollution outside the feed chain as well as from insufficient controls on waste disposal.

We strongly believe in the need for harmonisation as regards the presentation of results of official controls thus enabling to establish a clear and objective, transparent, fact-based picture of the situation at EU level. The principle of reporting based on common guidelines is essential. A key element for the reporting at EU level is the establishment of common protocols for official sampling and analysis so that results can be collated. National reports on the results of official food&feed controls should be made available to public as well as an annual European summary report.

We consider it is the role of the EU authorities to ensure European consumers that imported feed and food is as safe as home-produced food and feedstuffs, thereby guaranteeing to EU feed/food business operators a level playing field with third country operators. Since EU standards in terms of feed/food safety and animal welfare are well beyond standards in most third countries, it is essential to make sure that third country operators comply with EU standards for the products of animal origin they export to the EU which must be fed in compliance with EU legislation.

FEFAC therefore believes that a detailed list of EU legal texts should be established which the official feed and food controls in Member States and Third countries should check the compliance of the provisions. At present, it is not clear for example whether the legislation on medicated feeds (EU Directive 90/167/EU) falls under the scope of the present draft proposal.

We also do welcome the principles of on-the-spot checks as well as targeted inspections in third countries provided for in art. 49 including the supply of feedingstuffs, as well as the control plans and reports on the implementation of these control plans by third countries authorities as provided for by art. 50.

Finally, we support strongly the Commission statement concerning training of official inspectors as a strategic issue to ensure that official controls are carried out in a harmonised way and to promote a harmonised approach to food and feed safety throughout the European Union. In this context harmonised guidelines regarding the interpretation and presentation of control results are essential to ensure that this objective can be met.

We believe this is a key effort for European and national authorities on which will depend the credibility of the new integrated control system and the trust by feed&food business operators and ultimately the final consumer.

Thank you for taking our concerns into account,

Yours sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and lines, positioned above the typed name.

Y. Montecot  
FEFAC President