



## Mr Joel Newman

Chairman, IFIF Policy Committee

**The role of industry support in the development of standards: the IFIF Comparison Project on “Approval process and risk assessment procedures for feed ingredient”**



Organiser



Technical Support



Host

IFIF

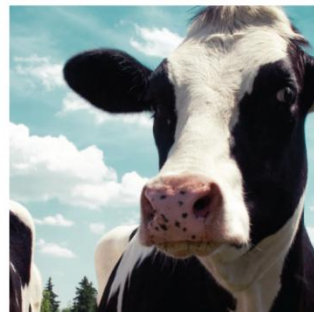


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# Industry Role in Standard Development

6th IFRM | Joel Newman, Chairman IFIF  
Policy Committee



# Agenda

- I. Industry Contributions in Process
- II. Examples of Where Contributing
- III. IFIF Project Overview
- IV. Summary of Feed Additive Comparison Project
- V. Feed Product Comparison Update

# Role in Standard Setting

## Contribution of Industry Involvement

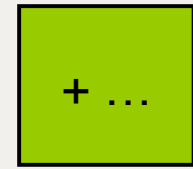
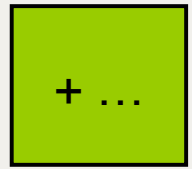
- Standards are based on sound science
- Industry capabilities are understood
- Consistency between Codex and other bodies
- Recognition of regional differences:
  - » Models
  - » Hazards

## IFIF & Industry Involved in Several Aspects

- Codex Task Force on Animal Feed & Committees (as they relate to feed)
- IFIF Feed LCA Project
- IFIF Specialty Feed Ingredients Sustainability Project
- Feed Additive Risk Analysis & Approval Comparison – Phase 2
- Feed Product Approval Comparison – Phase 1



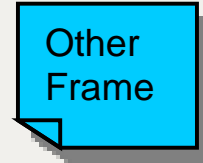
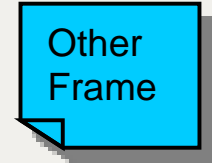
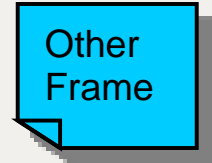
Step 1



Step 2



Step 3



# IFIF Feed Additive Comparison

## **Project Deliverables:**

- Education document for industry
- Reference for regulators to work towards better convergence or equivalency
- Platform for further project work

## **Distribution:**

- Available on IFIF website [www.ifif.org](http://www.ifif.org)

# Feed Additive Comparison

## **Step 1-Phase 1 (February, 2011)**

- Risk Assessment and Approval Process comparison for 3 jurisdictions: Canada, European Union, and United States
- Report identified similarities: risk assessment requirements for human (consumer) safety, target animal safety, intended use, environmental concerns, manufacturing controls, and ingredient identification.



# Feed Additive Comparison

## **Step 1-Phase 1, Significant Differences:**

- Terminology,
- Permitted intended use for ingredients,
- Specific data requirements,
- Regulations of products derived from genetic engineered sources,
- Proprietary nature, and
- Authorization periods.

# Feed Additive Comparison

## Step 1-Phase 2 (April, 2013)

- Expand to 7 jurisdictions: Brazil, Canada, China, European Union, Japan, South Africa, and United States
- Expand the comparison to include Regulatory Management of authorized ingredients as well as Risk Assessment/ Approval Process for new ingredients.

# Feed Additive Comparison

## Step 1, Phase 2 – Report

- 100 page report provides a detailed comparison of specific aspects of management of authorized ingredients and approval requirements for ingredients.
- Each jurisdiction has an appendix that covers the regulatory term definition and authorization submission requirements.
- Report will be available on IFIF website.

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# REPORT HIGHLIGHTS



## Report Content

- Common (CODEX) definitions used in the report.
- A series of tables that follow the questionnaire was developed
- Table of specific example to highlight the differences between jurisdictions
- Comparison of jurisdiction requirements for two simple feed ingredient authorization
- Summary of comparisons
- Linkable (when available) list of references to each jurisdiction's laws and regulations



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## Report Content cont.

### **APPENDICES**

- For each jurisdiction there is an appendix that provides the regulatory definitions and submission requirements for authorities' review of feed ingredients that require authorization

# Feed Additive Comparison

## PROPRIETARY NATURE OF FEED INGREDIENTS

- Non-Proprietary: U.S. , Japan, some EU and some Canadian ingredients
- Proprietary: Brazil, China, South Africa, some EU and some Canadian ingredients



## Use of Positive List

- Jurisdictions that have a positive list:
  - Canada, Brazil, China, and
  - South Africa (under development)
- Jurisdictions that DO NOT use a positive list
  - EU has a list of authorized feed additives, and a non-exhaustive catalog of feed materials
  - Japan has a complete list of feed additives, but not feed ingredients
  - U.S. has a near complete list of ingredients in the AAFCO OP, but it does not include common feed ingredients and all GRAS substances



# Feed Additive Comparison

## LENGTH OF AUTHORIZATION

- **China, Japan, U.S., and Canada** (for non-proprietary ingredients) have an unlimited authorization period.
- **Brazil** authorization period is 5 years
- **Canada** authorization period is 3 years (for proprietary ingredients)
- **EU** feed additive authorization period is 10 years
- **South Africa** authorization period is 3 years

# Feed Ingredients Manufactured Using Genetic Engineering

- **Brazil, China, EU, Japan, and South Africa** have specific laws or regulations that describe the regulation and/or labeling of feed ingredient manufactured using genetically modified organisms or plants.
- **Canada and U.S.** have no specific laws or regulations for these products. They rely on laws/regulations that cover all feed ingredients.

## Feed Additive Comparison

### Claims of Animal Production (growth, feed efficiency) for Feed Ingredients

- **Brazil, Canada, China, EU, and Japan** permit animal production claims for feed ingredients (some require special testing).
- **South Africa** and **U.S.** do not permit animal production claims for feed ingredients.

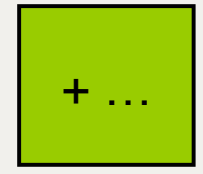
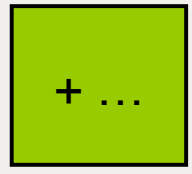


## Authorisation Requirements for new Ingredients

- In all jurisdictions, most new feed ingredients are subject to premarket authorization. Submissions cover the safe manufacture, the safety of the ingredient to the target animal and the human consumer, and the efficacy or utility of the ingredient.
- In all regulatory jurisdictions the submission requirements vary as related to composition of the new additive, intended use, species, and the method of manufacture



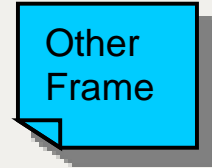
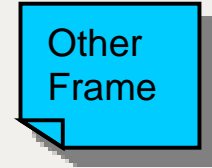
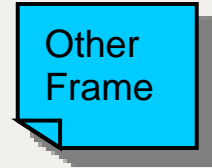
Step 1



Step 2



Step 3





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# Feed Products Comparison

## Step 2 Phase 1

- Review of Products approved in EU, USA and Canada
- In-depth comparison of assessment and approval process / requirements for same product



Lysine	EU	US	CA
Lys HCL	>98%	>95%	>95%
Liq Lys	>50%	>50%	>50%
Lys SO4	>40%	>50%	>45%
No viable cells	✓	✓	✓
Specified Bact. (species A)	✓	✓	✓
<b>Species B</b>	Application	Application	Application
<b>GMO</b>	✓		

**Biomass**

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Thank you!  
Discussion