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Technical Barriers to International Trade

4th global feed and food congress South Africa 2013

Organiser: IFIF Feed the world

Technical Support: FAO Fiat Panis

Host: AFMA Safe Feed for Safe Food

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ASOCIACIÓN DE LAS INDUSTRIAS DE ALIMENTACIÓN ANIMAL DE AMÉRICA LATINA Y CARIBE

Technical barriers to international trade of feed

4th Global Feed & Food Congress, Sun City, 10-12 April 2013

Antonio R. Chagas Lima, DVM

Technical barriers to trade:

According to World Trade Organization:

- Technical regulations and product standards may vary from country to country. Having many different regulations and standards makes life difficult for producers and exporters. If regulations are set arbitrarily, they could be used as an excuse for protectionism.
- The Agreement on Technical Barriers to Trade tries to ensure that regulations, standards, testing and certification procedures do not create unnecessary obstacles, while also providing members with the right to implement measures to achieve legitimate policy objectives, such as the protection of human health and safety, or the environment.

Regulations for a feed ingredient

Different requirements to register a feed additive in Latin America

Most common Requirements:

To register a Nutritional feed additive

- Product specifications;
- Composition;
- Manufacturing process;
- Stability data;
- Method of analysis;
- Safety data sheet;

Most common Required Documents:

To register a Nutritional feed additive

- FSC:
  - ✓ Legalized or not;
  - ✓ With product composition or not;

- Letter of Authorization (leg. or not);
- License of the producer;
- Certificate of Origin (leg.);
- Original labels;
- Certificate of Analysis:
  - ✓ Copy or original, signed and notarized;

Special Requirements:

To register a Nutritional feed additive

- Sanitary or Veterinary Certificate;
  - ✓ Products that contain animal by products in its composition
- GMP Certificate;
  - ✓ FAMI-QS or Official Certificate or Regulation (EC 183/2005)
- Product Samples:
  - ✓ Active ingredient;
  - ✓ Final product;
- Product Monograph:
  - ✓ Each page signed and stamped by an official authority

Special Requirements:

To IMPORT a Nutritional feed additive

- Sanitary or Veterinary Certificate;
  - ✓ Products that contain animal by products in its composition
  - ✓ For each invoice, according to the respective batches
  - ✓ Legalized

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Proposal for Documents:

To register a Nutritional feed additive

- Free Sales Certificate, which includes:
  - ✓ Name of the product; (composition in the PDS)
  - ✓ Complete name and address of the producer; (replaces CoO)
  - ✓ States the manufacturer is duly approved to produce the product (replaces official License);
  - ✓ The producer is also duly authorized to export;
  - ✓ The producer complies with the GMP to assure quality principles (replaces official certificate) or accepts international recognized certificates;
- Letter of Authorization;
- Original labels;
- Certificate of Analysis; (copy)

Proposal for Documents:

To register a Nutritional feed additive

- Sanitary/Veterinary Certificate just for the **registration** process, when the product contains any animal by-product in its composition.

- Legalization of the documents should follow the “reciprocity policy” among the countries.

Proposal for Documents:

To avoid more red tape:

- Understand and carefully evaluate current outbreaks of diseases and contaminants issues, to avoid new unnecessary documents!
  - ✓ BSE;
  - ✓ FMD;
  - ✓ Acute Respiratory Syndrome;
  - ✓ Swine Influenza;
  - ✓ Poultry Influenza;
  - ✓ Dioxin residues;
  - ✓ Melamine residues, etc.

New Products, grey zone?

How to classify a “Different” feed additive/ingredient?

- Lack of some categories to include new products (feed additives), according to its claims (not zootechnical), origins and functions:
  - Herbal extracts;
  - Fungi;
  - Yeast;
  - Eubiotics;
  - Not Vet products !!;
- Marketing is always a step ahead: we must update the classification to get a harmonization.

New Legislations

TRENDS:

- Trend to be more restrictive and demanding, emphasizing:
  - ✓ Traceability;
  - ✓ GMP;
  - ✓ Residues;
  - ✓ Contaminants;
  - ✓ Responsible use of antibacterials as growth promoters;

- This can be audited in practice, not through documents (more red tape);
- Stronger influence of International Organizations;

Main Global Regulators

WHO

World Health Organizazion

FAO

Food and Agriculture Organization of the United Nations

FAO/ WHO Food Standards

CODEX alimentarius

- Food standards, guidelines and related texts

JECFA

- Joint FAO/WHO Expert Committee on Food Additives
- Independent Scientific Advice on Safety of Food Additives

U.S. Food and Drug Administration

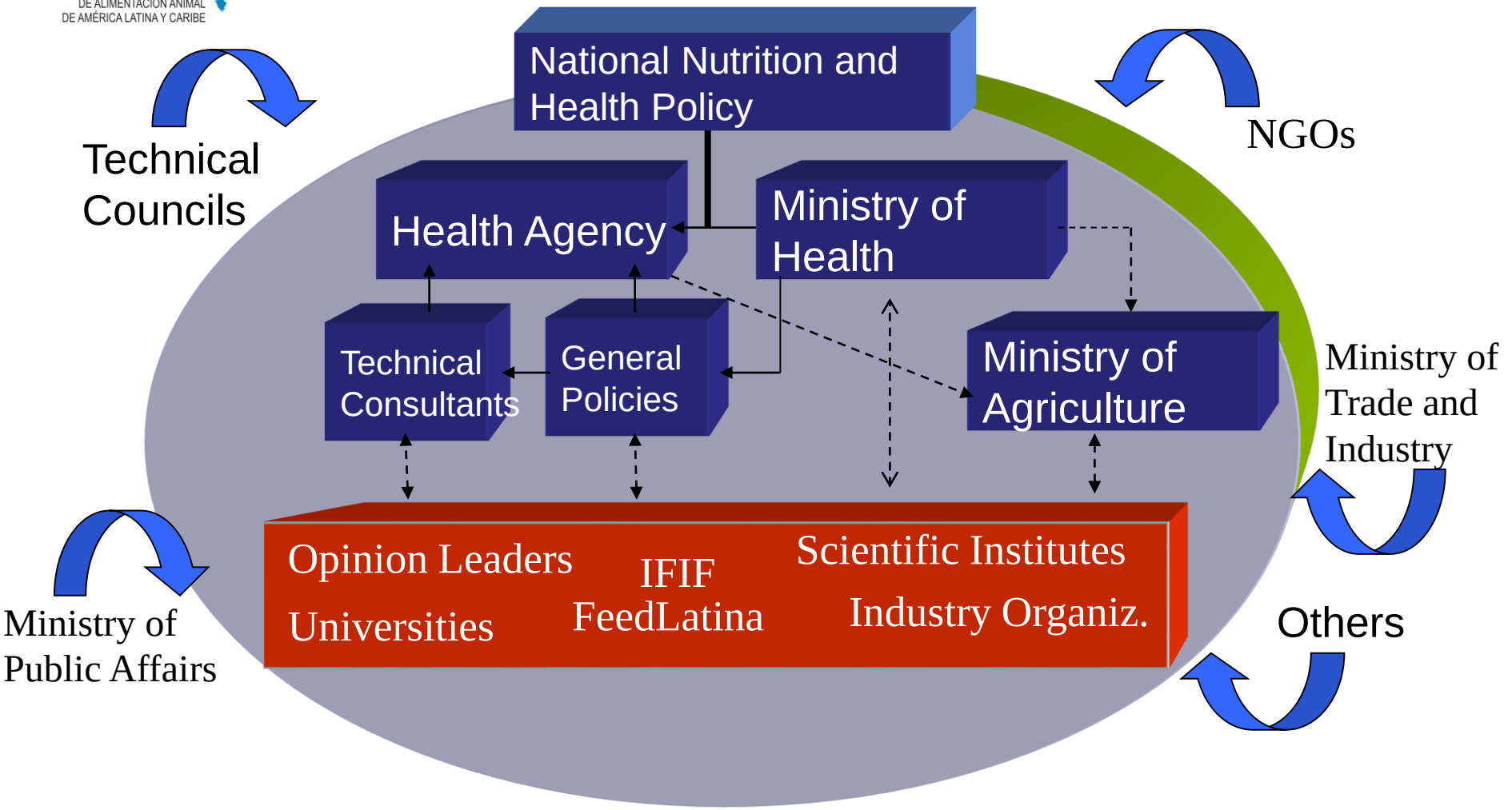
European Union Directives

efsa

European Food Safety Authority

- Keystone of European Union (EU) risk assessment regarding food and feed safety
- Independent scientific advice and clear communication on existing and emerging risks

General Regulatory Environment: Major players



What do we need ?

Medium to long term:

- Anticipate the trends;
- Understand the motives and fears of the authorities;
- Work together and negotiate with the authorities;
- Find reasonable solutions;
- Mutually satisfactory solutions;
- Valid for long time periods;

What do we need ?

Medium to long term:

- Documents harmonization;
- Avoid too many different certificates;
- Less bureaucracy, like notarization, stamps, legalization…
- Recognition of the product's registration among countries, for import and export processes;

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THANK YOU !!!!