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Overview on the notifications to the Rapid Alert System for Food and Feed in 2018

The European Commission publishes every year its report on the functioning of the Rapid Alert System for Food and Feed (RASFF) containing a detailed analysis of alerts, information & border rejections notifications for food and feed for the calendar year (see http://ec.europa.eu/food/food/rapidalert/index_en.htm).

In parallel to the publication of the official annual report, FEFAC provides a more detailed report focusing on animal feed related notifications. Here is the report for 2018. Please note that the RASFF portal should by no means be regarded as a fair representation of the actual state of feed safety in the EU. It can nevertheless provide some interesting elements for the upgrade of private and public control programmes.

Key findings for 2018

- 313 feed related notifications were sent to the RASFF in 2018, thereof 59 % for feed for farmed animals and 41% for petfood. This is 31% more than in 2017 and represents 8.5% of all notifications to the RASFF (feed & petfood and food).
- Among the 186 notifications for feed for farm animals, 8% triggered alerts, whereas 72% gave rise to information and 20% to border rejections. Microbiological contamination is statistically speaking the most frequent motivation for notification to the RASFF in the area of feed for farm animals (more than 60% of all notifications).
- 92% of notifications for feed for farm animals concern feed ingredients, thereof 85% for feed materials and 7% for feed additives. This shows the importance of the detection of contaminants at the earliest stage of the chain, in line with the “top-of-the-pyramid” principle promoted by FEFAC in its [vision paper](#) on feed safety management.
- The main characteristic of the 2018 RASFF notification pattern is the dramatic increase (+47%) of the number of notifications concerning microbiological contamination of feed for food producing animals, mostly Salmonella, after 4 years of steady decrease. It remains to be seen whether this is an exceptional situation or a reversion of a trend.
- To be noted also in 2018 the emergence of new “compliance” issues, with the detection of recombinant DNA in a consignment of vitamin B2 from China (1 notification by Belgium) and the detection of foreign bodies in fish meal from Chile and Mauritius (6 notifications by Italy).
- 58% of the notifications concerning feed for food producing animals present on the EU market result from own-checks perform by operators. This is more than in 2017 (58% vs. 50%) and remains well above the proportion 10 years ago (20%), showing an increasing reliability of private controls and responsibility of operators notifying incidents to their authorities.

Overview on the notifications to the Rapid Alert System for Food and Feed in 2018

I. General overview

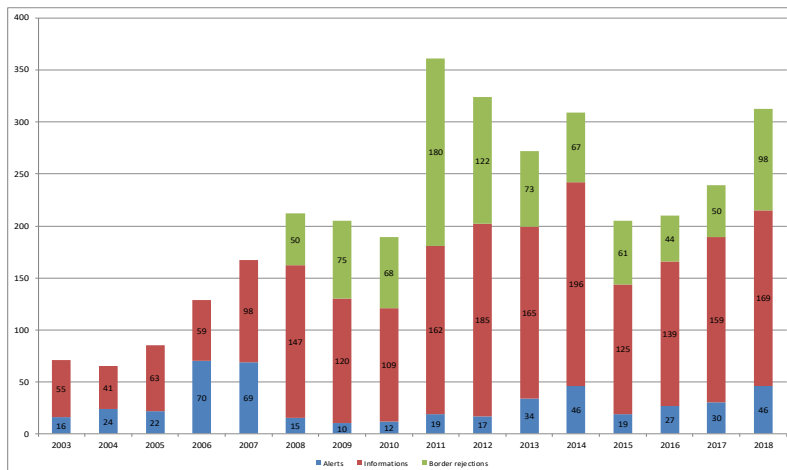
The total number of notifications for feed (incl. petfood) reached 313 in 2018, i.e. 8.5% of all RASFF notifications. This is 31% more than in 2017 and 14% more than the average 2011-2017 period.

These 313 notifications consisted in 46 alert notifications, 169 information notifications and 98 border rejections, thereof resp 15, 133 and 38 for feed for food producing animals. 41% of the notifications related to petfood (compound pet food and feed materials for use by pets). As regards feed for farmed animals, contamination of premixtures & feed additives and feed materials triggered resp. 14 and 158 notifications, whereas compound feed represented 14 notifications. In practice, the proportion of notifications due to contamination of feed ingredients is higher since most notifications related to compound feed are actually linked to contamination of feed ingredients (e.g. ruminant DNA detected in compound feed for fish because of the presence of the ruminant DNA in the ingredients).

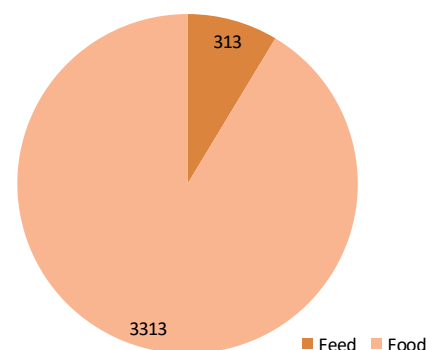
When border rejections are not taken into consideration, 58% of the notifications for feed for food producing animals were issued further to own-checks by companies (against 27% for the whole of the feed & food sector). This illustrates the effectiveness of own controls and responsible behaviour of feed business operators in case of positive result.

5 countries represent together 2/3 of the notifications: Germany recorded the highest number of notifications for all types of feed (69), then come Belgium (47), UK (36), Italy (31) and The Netherlands (27). Most of these notifications are information for attention or for follow-up or border rejections and concern for a large part Salmonella contamination. In terms of origin of contaminated products, it is well balanced between EU and Third Countries (166 vs. 147), with Gambia, China and USA being the most sensitive origins with resp. 22, 19 and 17 notifications triggered.

Overview of feed (incl. petfood) notifications from 2003 to 2018



Notifications in 2018



Number of notifications	2010	2011	2012	2013	2014	2015	2016	2017	2018
Feed + petfood	189	361	324	272	309	205	210	239	313
Food	3,107	3,355	3,107	2,863	2,787	2,611	2,715	3,525	3,313
Total	3,296	3,716	3,431	3,135	3,096	2,816	2,925	3,764	3,626
Proportion Feed+ petfood	6.4%	5.7%	9.7%	9.4%	8.7%	10.0%	7.3%	7.2%	8.6%

II. Analysis by type of contaminations/products for feed for farmed animals:

- 186 notifications related to feed for farmed animals¹, thereof 15 alerts, 38 border rejections and 133 information for follow-up or attention.
- Out of the 15 alerts issued, 5 related to botanical contaminants (ragweed) and 5 to dioxins and DL PCBs (thereof two involving sunflower meal and fatty acids from Ukraine) and 2 for aflatoxin.
- The number of notifications regarding feed for farmed animals related to microbiological contamination (mostly Salmonella) in feed materials increased by 47% compared to 2017 and represents almost 2/3 of the notifications. It must be reminded that, at the present stage, there is no EU harmonised legal standard for microbiological contaminants in feed (except for processed animal proteins), which means that the vast majority of notifications on microbiological contamination relate to non-compliance with national standards. This explains also why the 79 notifications for Salmonella contamination of feed for food producing animals other than from animal origin are made by 12 EU countries only, thereof more than half by Germany and Finland.
- When excluding microbiological contamination, 70 notifications related to feed for farmed animals were made in 2018, vs.66 in 2017. The difference is mainly due to an increase in the number of notifications for the presence of ruminant DNA in processed animal proteins (13 against 9) although this remains far below the figure reported in 2015 (22). The number of non-compliance with pesticide MRLs has also increased (4 in 2018). On the other hand, no notification of suspicion of fraud regarding addition of urea in yeasts biomass was reported in 2018, against 17 in 2017. This suggests that this fraud has stopped.
- Since September 2012, oils and fats and their derivatives are subject to intensive monitoring for dioxins, with the most at-risk products subject to 100% control. The RASFF is therefore exhaustive in terms of non-compliances for the most “at-risk” feed materials. In 2018, out of the 13 notifications made for too high levels of dioxins/PCBs, only one concerned a product subject to 100% monitoring (sunflower fatty acids), which proves that the chain has achieved an excellent level of control of the dioxin risk in oils and fats and their derivatives. Significant progress was also achieved in terms of prevention of the risk of dioxin formation during drying in certain Third Countries (no notification concerning dried herbs from India this year vs. 4 in 2017) but not all: Ukraine remains an at-risk origin for e.g. oilseed / oilseed meals. Other incidents with dioxins concerned feed additives (trace element compounds and bentonite) and compound feed.
- The number of notifications concerning heavy metals (9) is stable vs. previous years, whereas that related to prohibited substances (2) remains very low and concerns the unauthorised presence of coccidiostats and unauthorised use of pesticides.
- No case of non-EU authorised GM crop was reported in 2018. However, recombinant DNA from a GM microorganism was detected in a consignment of vitamin B2 from China (see chapter III).

¹ Based on available information on their nature and available information in the RASFF, feed materials were classified either as feed materials for farmed animals or for petfood. In case of doubt or absence of information, the feed materials have been considered by default as being destined to farmed animals.

III. Focus on specific issues

The Feed Safety Incidents Management Team established by FEFAC in 2014 monitors all feed safety/non-compliance incidents reported in the RASFF, evaluating their severity and magnitude and, in certain cases, investigating further in the origin and measures required to properly manage the risk with contaminated products and control the occurrence of the related hazards in the future.

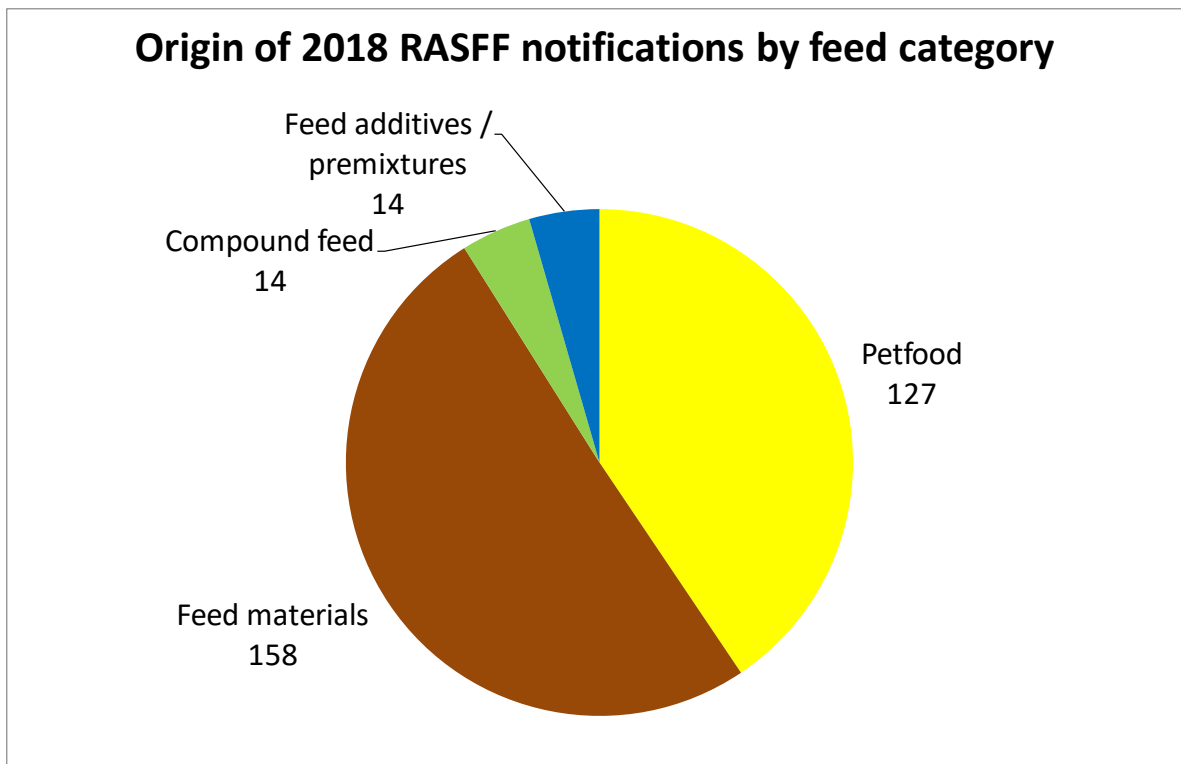
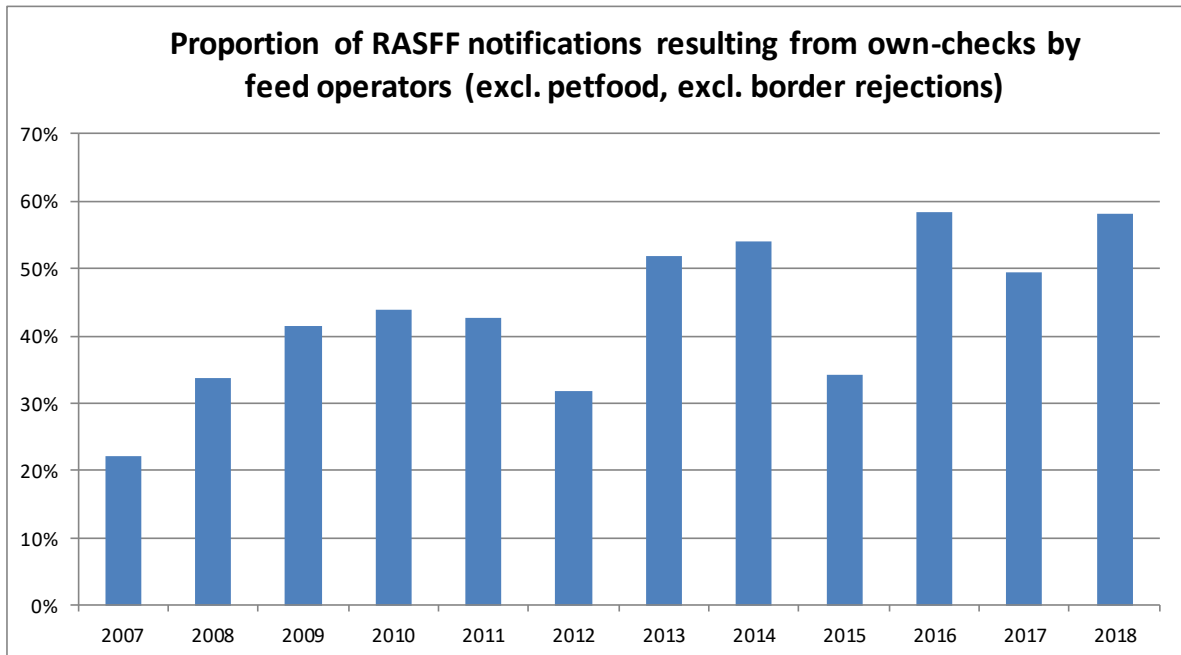
In 2018, the Feed Safety Incidents Management Team worked especially on one issue, i.e. the presence of recombinant DNA in a consignment of vitamin B2 imported from China (unlike mentioned in the RASFF, no living microorganism was actually detected). Although there was only one notification in October 2018 and feed safety was not at stake, FEFAC experts took this notification very seriously because of the potential economic impact on the market of such incidents. A consignment of 10 t (which is relatively modest in size) can be incorporated in 1 to 2 million tonnes of compound feed and therefore withdrawal costs can become quickly huge. In the case of October 2018, the impact was limited because about half of the 8 t constituting the consignment was blocked and most of the compound feed containing the other half had been used up. The main issue for feed business operators is the lack of analytical means to allow proper monitoring of consignments. FEFAC initiated several actions: vis-à-vis EU authorities to allow operators to get access to methods of analysis and, meanwhile, to obtain from control authorities that official checks are performed at the earliest stage of the chain to stop as early as possible any risk of contamination further down the chain. FEFAC contacted also supplier organisations to obtain information on the efficiency of purification processes implemented in the fermentation industry in the EU and Third Countries. The objective of FEFAC in 2019 will be to obtain from suppliers of feed additives by fermentation more guarantees as regards the control of their purification process and agree on an analytical standard for the testing of fermentation feed additives for the absence of recombinant DNA.

The FEFAC Feed Safety Incident Management Team continued monitoring the potential origins for the presence of ruminant DNA in feed destined to aquaculture. This recurrent problem emerged in 2013, further to the re-authorisation of non-ruminant PAPs in fish feed (from 1 July 2013 on). New Standard Operating Procedures involving a very sensitive method for ruminant DNA testing for the control of the implementation of the feed ban was introduced with a strict 0-tolerance policy. As from the second half 2013, a number of notifications were issued by national authorities further to controls on feed materials of animal origin and fish feed. In the vast majority of cases, the detection of DNA was close to the cut-off value, meaning extremely low levels. RASFF notifications relate to non-compliance with the 0-tolerance principle laid down in the EU “feed ban” legislation and do not trigger any safety concern. Investigations were launched to identify the source of the presence of recombinant DNA, which sometimes could be clearly linked to incorrect practices in the chain, but sometimes was also due to the presence of permitted ingredients such as milk. FEFAC asked the EU Commission for the establishment of an action limit to facilitate the interpretation of results close to the cut-off value of the method and facilitate thereby Risk Management decisions. EFSA issued an opinion on the establishment of such action limit in summer 2018.

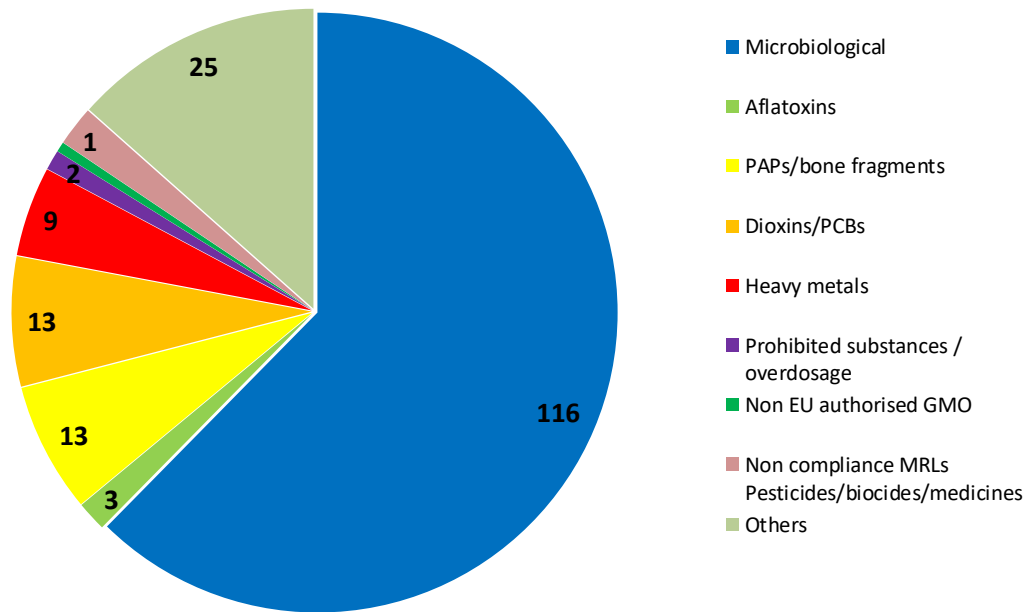
The Feed Safety Incidents Management Team continued also to explore and map the risks with pesticide residues, the purpose being to anticipate potential risks of non-compliance due to decreases of pesticides MRLs in the EU or elimination of Import Tolerances for substances falling in the scope of the cut-off criteria.

In 2019, the Feed Safety Incidents Management team will pay special attention to the Salmonella contamination incidents to check whether the 2018 increase is confirmed and can be also observed in official and private monitoring programmes. If this is the case, the Feed Safety Incidents Management Team will investigate in the root causes of this evolution and the extent to which it can be linked with the fact that formaldehyde can no longer be used to control microbial contamination of feed.

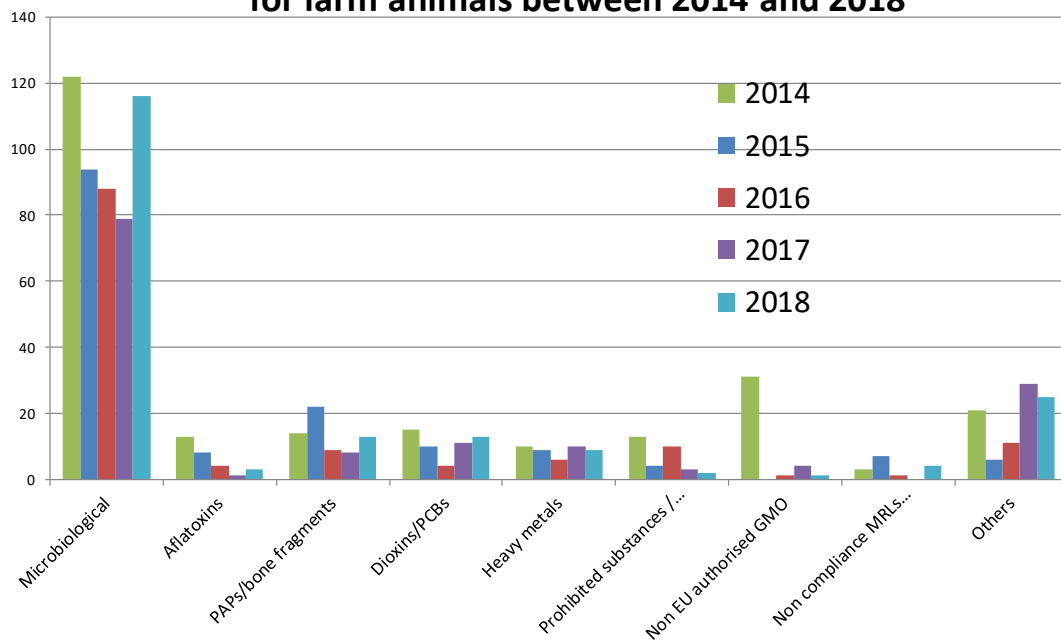
IV. Charts



Notifications in 2018 by type of contaminant for farm animals



Evolution of total notifications by type of contaminants for farm animals between 2014 and 2018



Breakdown of feed notifications per notifying country

Member States	Alert notification (AN)	Information notification (IN)	Border rejections (BR)	Pet food (AN+IN+BR)	TOTAL
Germany	7	31	11	20 (9 + 5 + 6)	69
Belgium	1	23	0	23 (4 + 11 + 8)	47
UK	0	2	2	32 (2 + 5 + 25)	36
Italy	1	10	6	14 (2 + 9 + 3)	31
Netherlands	5	4	1	17 (0 + 2 + 15)	27
Austria	0	13	0	9 (9 + 0 + 0)	22
Finland	0	14	2	0	16
Greece	0	1	8	2 (0 + 1 + 2)	11
Spain	0	8	2	0	10
Sweden	0	6	0	3 (2 + 0 + 1)	9
France	0	4	1	1 (0 + 0 + 1)	6
Latvia	0	4	0	0	4
Poland	0	1	2	1 (0 + 1 + 0)	4
Czech republic	0	2	0	1 (0 + 1 + 0)	3
Denmark	0	0	0	2 (2 + 0 + 0)	2
Croatia	0	2	0	0	2
Ireland	0	2	0	0	2
Malta	0	1	0	1 (0 + 1 + 0)	2
Hungary	0	1	1	0	2
Portugal	0	0	2	0	2
Iceland	1	0	0	0	1
Lithuania	0	0	0	1 (1 + 0 + 0)	1
Cyprus	0	1	0	0	1
Luxembourg	0	1	0	0	1
Slovakia	0	1	0	0	1
Switzerland	0	1	0	0	1
Total EU+EEA	15	133	38	127 (31+36+60)	313