

FAMI-QS Revision and Regulatory Developments in USA

STATUS OF THE FAMI-QS REVISION

FAMI-QS is undertaking the exciting task of fully revising its System, in order to keep it technically fit to meet the challenges ahead of us.

1. FAMI-QS Code Version 6, Draft 0 document had its structure based on the **ISO High Level Structure**. The latest version of the applicable accreditation standards were incorporated: **ISO 17021; ISO/TS 22002; ISO/TS 22003**.
2. The Expert Group revised the document and provided their input - FAMI-QS Code Version 6, Draft 1.
3. The FAMI-QS Code Version 6, Draft 1 was distributed among the Local Working Groups (LWG) created in order to assess **at local level** the revision of the FAMI-QS certification System. **We had 4 LWG: Europe – USA – China – Brazil**
4. The comments from the LWG were assessed by the Expert Group - FAMI-QS Code Version 6, Draft 2.
5. The FAMI-QS Code Version 6, Draft 2 was distributed among our Board of Directors, Expert Group, Local Working Groups, Certification Bodies and Partners for comments. These comments were assessed in May 2016.
6. The comments shall be incorporated and the Code shall be harmonized - FAMI-QS Code Version 6, Draft 3. **By December 2016, the document will be ready for public consultation and will be made available on our website for comments, for a period of three months.**

Regulatory Developments in USA

A significant change in the global feed legislation, is currently on-going and the new requirements will further support the production of safe feed ingredients. The regulatory developments in the U.S., namely the **FDA Food Safety Modernization Act (FSMA)** and **cGMP animal food** rules will also be integrated and taken into account in our Revision Process.

The FDA Food Safety Modernization Act (FSMA), signed into law in 2011, enables the **FDA to focus its food safety efforts on preventing problems** rather than relying primarily on reacting to problems after they occur.

Both FAMI-QS and FSMA rule share a common philosophy of a “Risk based and system based approach” and the overarching policy requirement for staff and management commitment to food safety. All the applicable requirements were incorporated into our revision.

Focus on Copper Chemicals: Know your Copper Source?

This article was written to give an insight into the sources of Copper used to produce Copper chemicals and in particular Copper Sulphate. It sets out to demonstrate there are potential risks which are often over-looked by stakeholders & auditing processes alike, due to a limited understanding of the production processes. The testing regimes currently employed by most producers are not rigorous enough to detect out-of-specification material.

As a consequence, contaminated products could enter finished feed and eventually end-up in the food chain.

This article is not comprehensive or intended to cover all aspects of Copper sources, risks and production processes, but is rather designed to raise awareness of potential issues that are not currently considered.

Quite clearly Copper chemicals need a source of Copper in order to be produced. Sources typically include Copper Ore, Copper Electrolyte, Copper Cathode, Copper Shot and Copper Etchant. The most common source however, is Copper Scrap. Copper Scrap can be used to produce other sources of metallic Copper such as cathode and the same considerations apply.



High Voltage Copper Cable is considered to contain 50% Copper.

Copper Scrap comes in many forms but typically Operators do not delve further into the type of Copper scrap used, how the different types are handled, separated or cleaned. There are numerous categories of Copper scrap, perhaps 15 -20, and terms that metal merchants use are based on the purity and mix that Copper Scraps contain. For example, Bright Copper Wire is uncoated, un-alloyed and un-insulated. The wire is free from tarnish and other impurities. Copper No. 2 is miscellaneous pipe, wire and comprises other solids that may contain solder, paint or enamel. There are a range of other sources too, but for Copper chemistry the most common source of Copper Scrap are varieties of Cable.

Cables come in numerous sub-categories defined by the typical Copper content and the amount of other materials included in the cables such as Insulation, Plastic, Rubber, Tin, Plugs, Glass, Silver and Nickel. Copper content can be as low as 40%. The Insulation & Plastic materials are sources of Dioxins, PCB's & non-Dioxin like PCB's, the other materials are sources of unwanted physical contamination including Heavy Metals.

It is extremely important that these sources of raw materials are adequately prepared and cleaned before they are used as a raw material to produce Copper chemicals. The Operator should know this part of the process in order to make a risk assessment. Each consignment of Copper Scrap received by a chemical producer is different and should therefore be handled in the most appropriate way. A number of questions arise at this stage of the production process:

- How is the Copper Scrap separated from the other materials?

- How is the Copper Scrap cleaned?
- How many times can the cleaning solutions be used before becoming saturated?
- How is contamination from the cleaning solutions prevented from entering the production process?
- How does the batch numbering system work?
- Are batches based on each lot of Copper Scrap?
- How many times are final batches of chemicals tested?
- How does the testing of finished product relate to the batches of raw material?
- Can you be assured that the testing regime detects issues?

The question is, how can we be certain that Copper Sulphate produced this way is safe? The testing regime is not comprehensive enough to guarantee the quality of such a variety of Copper scrap sources without knowing what those sources are. Many good batches may be produced which, in a composite sample, may dilute the undesirable substances of the "bad" batch. The "bad" batch wouldn't then be identified and could easily end up being used in Premix without being detected.

It should be considered that the Copper Sulphate or Copper chemicals produced from Copper Scrap warrant closer attention, especially the batch numbering, traceability and Quality Assurance.

Furthermore, the testing regimes employed should be more robust to eliminate the risk of "bad" batches filtering through to end-users and ensure Feed Safety.

Other zootechnical additives (reduction of urinary pH)

[Commission Implementing Regulation \(EU\) 2016/1007 of 22 June 2016 concerning the authorisation of ammonium chloride as a feed additive for ruminants other than lambs for fattening, cats and dogs \(holder of the authorisation Latochema Co. Ltd\)](#) (OJ L 165, 2016-06-23)

Recommendation - Nickel

[Commission Recommendation of 28 June 2016 on the monitoring of the presence of nickel in feed](#) (OJ C 235, 2016-06-29)

Official Controls

The legislative procedure launched by Commission proposal in 2013 is reaching its end after thorny discussions, mainly due to transition to fee-funded checks in the food sector. The last changes made in the trilogue negotiations are summarized in [this document](#). The text of the new Regulation can be found [here](#).

Timetable for the adoption of the new Regulation:

- July 2016: European Parliament's Environmental Committee (ENVI) will vote on the draft Regulation as it stands now;
- September 2016: European Parliament will endorse the text;
- October 2016: expected for publication to become effective after a three-year transition period.

[Commission Implementing Regulation \(EU\) 2016/1024 of 24 June 2016 amending Regulation \(EC\) No 669/2009 implementing Regulation \(EC\) No 882/2004 of the European Parliament and of the Council as regards the increased level of official controls on imports of certain feed and food of non-animal origin](#)

MISCELLANEOUS

FUTURE EVENT: AWARENESS IN FEED SAFETY - TRAINING FOR INDUSTRY

FAMI-QS will organize a 2-day training session for the Industry of Specialty Feed Ingredients on the 4th and 5th of October 2016.

WHY ATTEND THIS TRAINING?

The aim of the training is to provide the necessary information to the participants regarding:

- FAMI-QS certification process;
- Requirements of the FAMI-QS Code;
- Interpretation of the Code;
- Feed safety;
- EU feed legislation.

PRACTICAL INFORMATION

[VENUE] BRUSSELS (exact location to be confirmed)

[ADMISSION FEE] 450€

[BINDING REGISTRATION] 1ST OF SEPTEMBER 2016

"An industry-driven, sector-specific quality system, with unrivalled value on the global certification market."

Each participant will receive a certificate of participation.

In case you are interested in participating, please contact Ms. Aleksandra Jankowska (aleksandra@fami-qs.org)

BREXIT FALLOUT

The vote on departure of the United Kingdom from the European Union has no immediate legal consequences for UK feed law or the trade in feedstuffs between the UK and the EU.

The UK is still subject to its legal obligations to the EU and vice versa, until an exit is formally concluded. The timetable for this, and any transitional regime that goes with it, will only start to emerge over time. Insofar as UK food law flows from EU directives, leaving the EU has little impact as the underlying UK laws which have implemented those directives will still remain. This is different where feed law is derived from directly applicable EU regulations where they are not copied out in national law (which is the case for most relevant EU laws). The UK legislator will need to redraft these laws which may result in considerable change. However, that will not happen for some time and the EU laws stand until the UK decides to legislate. But it will be interesting to observe how, in the long run, a national variant of feed law is emerging on the basis of Community law as it stands today. What will happen in the more immediate future is that the Commission will refrain from intervening on issues where the UK already deviates for the European straight-and-narrow like it does in food law with the UK 'traffic light scheme' or a national sugar tax.

Official EU reaction to the BREXIT:

[http://europa.eu/rapid/press-release STATEMENT-16-2329_en.htm](http://europa.eu/rapid/press-release_STATEMENT-16-2329_en.htm)

[http://europa.eu/rapid/press-release MEMO-16-2328_en.htm](http://europa.eu/rapid/press-release_MEMO-16-2328_en.htm)



About FAMI-QS

FAMI-QS Asbl is the management and coordination centre for the FAMI-QS code of practice. It is the only certifiable code specifically aimed at Specialty Feed Ingredients and Their Mixtures (feed additives, functional feed ingredients, premixtures, specialty complementary feed, and specialty complementary dietetic feed) for animal nutrition. The code addresses safety, quality and regulatory compliance in order to minimize the risk that unsafe specialty feed ingredients enter the food and feed chain. It offers independent certification for all operators placing these products on the market. Based on partnership with international certification bodies and third countries institutional partners, it includes more than 850 certified sites spread across more than 52 countries. The current FAMI-QS President is Dr. Dieter Greissing, Evonik Industries AG.

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