



Animal Feed Working Group

Update on Nitrite in Feed Materials & Other Contaminants

**CEFS Board Meeting – General Affairs Committee
Dubrovnik, 8 June 2017**



Nitrite in feed materials: background

Nitrite in feed materials

- Current situation: **temporary** exemption from maximum level (ML) for CEFS

February 2014:

UK position paper questioning the need for nitrite ML

December 2014:

SCoPAFF discussed the possible deletion of nitrite ML

MS asked to assess the risk of nitrite on human & animal health

March 2015:

MS in agreement to delete ML

Discussion on a possible Commission Recommendation

February 2017:

First draft of the EC Recommendation on Nitrites & Nitrate



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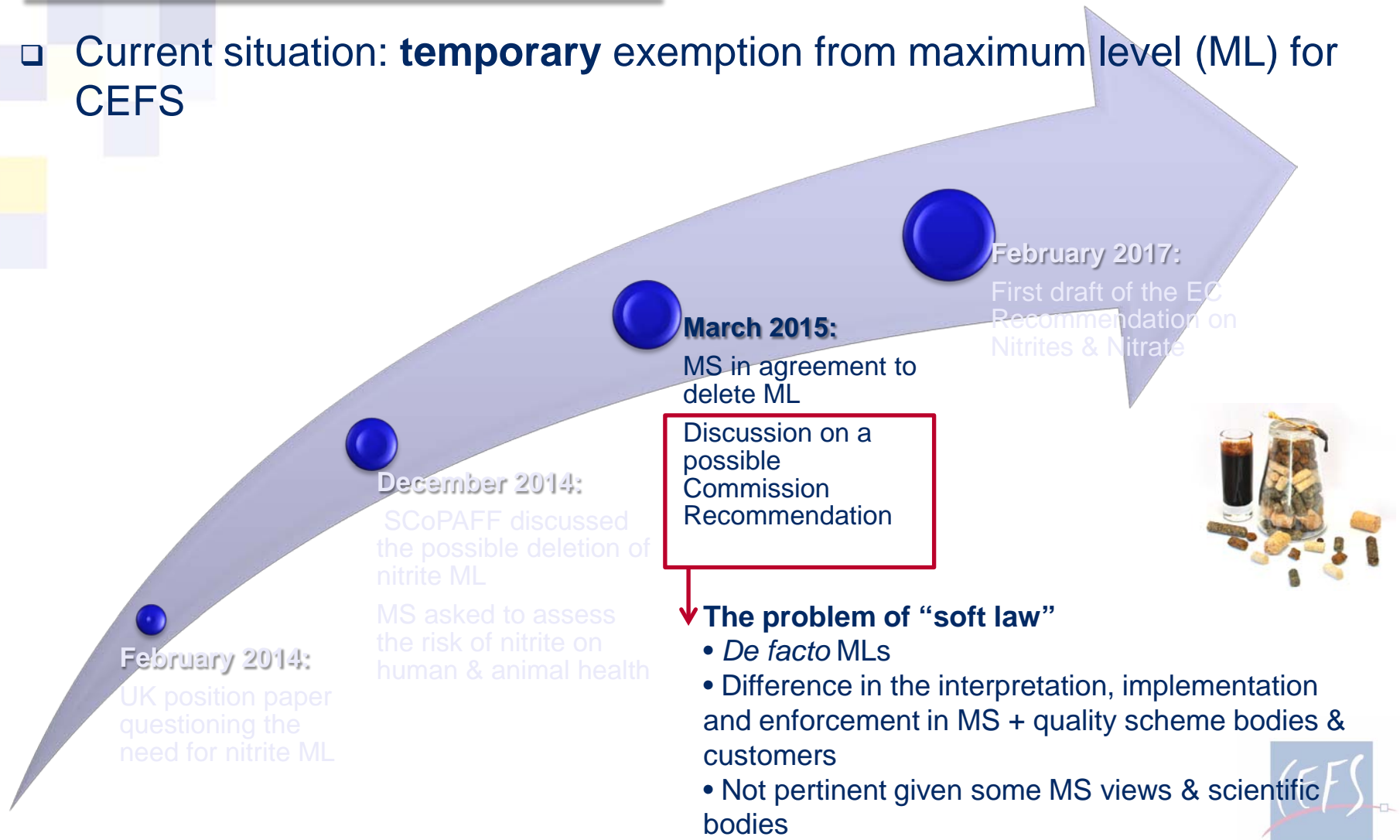
ANSES report :

- Nitrite and nitrate MLs not needed
- In line with UK position

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Nitrite in feed materials: EC Recommendation

- Very preliminary document divided into two parts:
 - Preamble
 - Annex
 - Good practices
 - Recommended levels



Nitrite in feed materials: EC Recommendation

- Very preliminary document divided into two parts:
 - Preamble:
 - High levels of nitrite in products and by-products from sugar beet and sugarcane and from the starch and alcoholic drink production
 - No reliable analytical results with method of analysis
 - EFSA conclusion: No concern for human health from presence of nitrite in animal products
 - Led to temporary exemption of products and by-products from sugar beet and sugarcane and from the starch and alcoholic drink production
 - Presence of nitrate has impact on nitrite exposure
- ➔ **Appropriate to recommend good practices to keep the level of nitrites and nitrates in feed as low as reasonably achievable**

Nitrite in feed materials: EC Recommendation

- Very preliminary document divided into two parts:
 - Annex
 - Good practices:
 - Focusing only on mitigation measures for nitrate
 - For nitrite: *“Particular attention is to be paid when using products and by-products from sugar beet and sugarcane and from starch and alcoholic drink production as they may contain high levels of nitrite.”*
 - Recommended levels - nitrites

8. Following levels of nitrite (expressed in mg/kg on a 88% dry matter basis) are to be used as guidance to avoid any possible adverse health effect as the consequence of the presence of nitrites in feed

	(mg/kg)
Feed materials (except fishmeal and silages)	15
Products and by-products from sugar beet and sugarcane and from starch and alcoholic drink production.	50
Complete feed for food producing animals	15

Nitrite in feed materials: EC Recommendation

- Very preliminary document divided into two parts:
 - Annex
 - Recommended levels – nitrates (2 options)

7. Following levels of nitrate (expressed in mg/kg on a 88% dry matter basis) are to be used as guidance to avoid any possible adverse health effect as the consequence of the presence of nitrates in feed

Nitrate (mg/kg)	Comment
0-4500	Safe to feed
45000-9000	Caution in particular when fed to pregnant animals.
>9000 – 16000	Not safe to feed pregnant animals Only safe to feed to other animals if limited to < 30 % of the ration.
>16000	Not safe to feed

- Acceptable levels
- Not an issue for CEFS
- ➔ No action needed

Nitrite in feed materials: impact on CEFS (1)

- 2003: SCAN opinion
 - “[Nitrites] natural levels in feedingstuffs have not been reported to cause intoxication of farm animals. As a consequence, **retaining limit for nitrites in feedingstuffs appears to serve no practical purpose**”
- 2009: EFSA opinion
 - “**the presence of nitrite in animal products does not raise any concern for human health**”
- 2014: ANSES opinion:
 - nitrite in feed materials **does not represent a health** risk for animals and humans
 - **nitrite maximum limits** in feed materials and compound feed **can be suppressed**

Nitrite in feed materials: impact on CEFS (2)

- University of Leuven Study (2015)
 - Review of toxicological database on nitrite in ruminants of EFSA opinion
 - Conclusions based on assumptions
 - Acute studies commissioned with high physiological doses in cannulated cows
 - Repeated feeding of 7.5 mg nitrite/kg bw did not result in adverse effects
 - Equivalent to 5.5 g nitrite/day
 - Such a level would cover a nitrite concentration of 500 mg/kg molasses on top of an otherwise 10 mg nitrite/kg compound feed

Nitrite in feed materials: impact on CEFS (3)

	FRESH MOLASSES			
	Jan. 2011	Oct. 2011	Nov, 2011	Dec, 2012
Number of samples	173	53	55	60
Nitrite as NaNO₂ (mg/kg) at 12% moisture				
<50	49,1%	66,0%	65,5%	71,7%
50-100	8,1%	13,2%	9,1%	11,7%
100-200	16,8%	11,3%	14,5%	8,3%
200-300	11,6%	5,7%	1,8%	3,3%
300-400	4,0%	3,8%	3,6%	3,3%
400-500	3,5%	0,0%	1,8%	1,7%
500-600	0,6%	0,0%	0,0%	0,0%
600-700	1,2%	0,0%	0,0%	0,0%
700-800	0,6%	0,0%	0,0%	0,0%
800-900	2,9%	0,0%	0,0%	0,0%
900-1000	0,6%	0,0%	0,0%	0,0%
> 1000	1,2%	0,0%	1,8%	0,0%

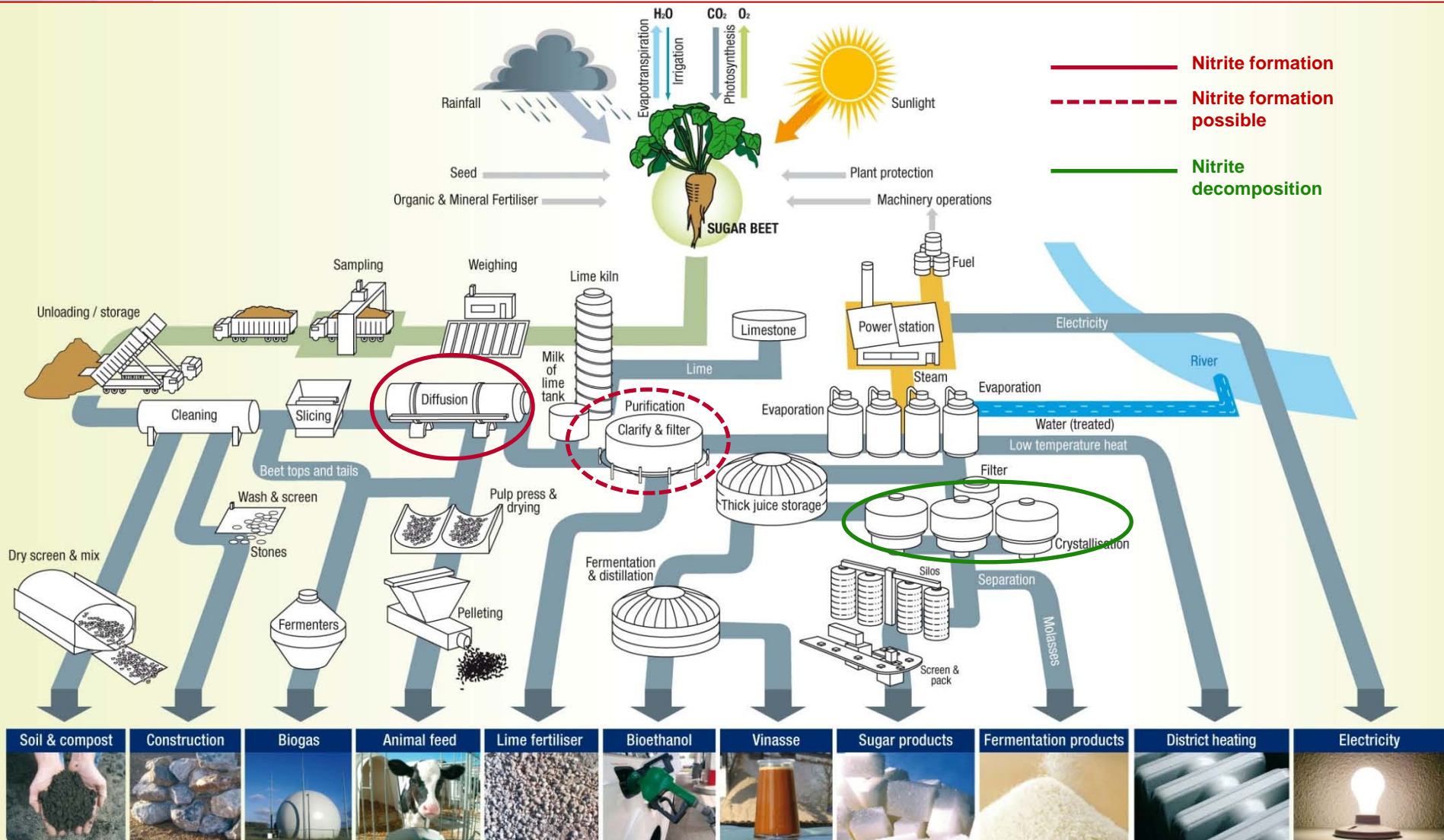


Nitrite in feed materials: impact on CEFS (4)

- Nitrite content **does not depend on the geographical location** of the factory
- Nitrite content **varies from one campaign to another**
- Concrete examples (nitrite levels in mg/kg):

			October 2011	November 2011	December 2012
Country 1	Country 2	Country 3			
Factory A1			239	423	35
Factory B1			30	28	295
Factory C1			<8	15	13
Factory D2			81	205	12
Factory E3			<8	16	3

Nitrite in feed materials: impact on CEFS (5)



Nitrite in feed materials: next steps in procedure

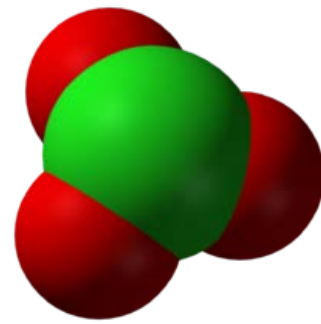
□ Next steps:

- EC Recommendation discussed in SCoPAFF on 23-24 May 2017
- Should be followed by a stakeholders consultation
- Vote in SCoPAFF (date not known) requiring qualified majority

Nitrite in feed materials: CEFS' actions so far

- ❑ Drafting of a position paper on the EC Recommendation
- ❑ Meeting with Frans Verstraete (DG SANTE) on 12 April ahead of SCoPAFF of 22-24 April
 - Progress on best practice with lower nitrite expected
 - Informed him on efforts of sugar industry
- ❑ Data/information provided to SCoPAFF showing why the Recommendation is not acceptable + method of analysis
- ❑ Template letter to help members contact national authorities ahead of SCoPAFF of 23-24 May
- ❑ Joint letter with SpiritsEurope, Starch Europe and the Brewers of Europe to DG SANTE, DG AGRI and DG GROW

Other contaminants issues



□ Multiple use/source substances

- View of the Commission: substances which were used in the past as PPP or which have currently dual uses → under the remit of Reg. 396/2005
 - Interim policy approach on biocide MRL setting (adopted)
 - Chlorate issue (on-hold)
 - Fitness check of Reg. 396/2005 (upcoming)



THANK YOU !

