



FEFANA contribution to the European Food Safety Authority consultation on Environmental Risk Assessment

FEFANA welcomes the consultation with stakeholders on such an important subject, and in particular being given the opportunity to comment on the harmonised approach.

FEFANA believes that the development of guidance documents, such as the proposed Environmental Risk Assessment, should be intrinsically linked to the requirements described in the Guidelines for the evaluation of feed additives (Reg. 1831/2003). Since these Guidelines are currently under discussion in the Standing Committee on the Food Chain and Animal Health, it is clearly premature to develop any such guidance documents without first defining their scope. As such FEFANA believes that it would be redundant to consider or evaluate such guidance notes until the regulatory framework is defined clearly. Whilst the proactive approach of EFSA is much appreciated, it is essential that the roles of the Commission and EFSA defined under the Food Law as far as the authorisation process of feed additives is concerned are separate and do not conflict.

We therefore recommend that this draft document is kept on hold until the Guidelines are produced by the European Commission and Standing Committee.

Without entering into detailed analysis of the document, because of the reasons mentioned above, FEFANA believes that the following elements included in the draft proposal should be embedded in future environmental risk assessment:

- the use of a tiered approach to evaluate environment exposure for terrestrial animals, allowing to progressively refine the risk assessment scenario;
- exemption for additives which are physiological/natural substances;
- the exemption for further testing if a negligible impact can be shown;

We are however very concerned about certain other suggested requirements such as:

- the evaluation of risk on the environment at the level of detailed target animal categories;
- the testing of the effect of the additive in both freshwater and marine water for additives authorised for all animal categories.

FEFANA is willing and interested to co-operate with EFSA on the possible development of environmental risk assessment guidance for feed additives, in light of the Guidelines foreseen by Regulation 1831/2003.