



POSITION PAPER

Limit in trace elements proposal

The Feed Additive Industry is not in favour of the possible setting of a maximum level of 30 ppm for arsenic in additives belonging to the functional group of compounds of trace elements.

As there are no safety issues regarding arsenic level in additives, FEFANA considers that undesirable substance limits for feed additives should be fixed through the Directive 2002/32/EC on undesirable substances in animal feed only if there are “urgent” safety issues.

For the rest, the Feed Additive Regulation should take over as soon as possible, and fix safety-based limits additive by additive as requested by risk assessment.

Besides, unlike other impurities like e.g. lead, the level of arsenic in most trace elements cannot be influenced by production technology. The exclusive way to control it is by raw material selection. Only if the availability of the right quality raw materials in sufficient quantities is secured, it is assured that there will not be a shortage of the final product.

According to FEFANA, the proposed maximum level of 30 ppm could be suitable concerning some additives except for certain Copper, Iron, Manganese and Zinc sources. Regarding Copper Sulphate, Iron carbonate, Manganous oxide and Zinc oxide, our industry considers that this limitation would lead to a high problem in supplying the market requirements. FEFANA is convinced that the suggested limit of 30 ppm is too ambitious.

Either a much higher general limit for arsenic should be fixed or specific limits taking into account the “nature” of the different trace element sources should be set.

Specific limits could also be fixed in connection with re-evaluation of the trace-elements.

Our industry, as important users of trace elements, considers the following limits proposal as realistic:

Coppersulphate:	max.100ppm
Copperoxide:	max.100ppm
Iron carbonate:	max. 50ppm
Zincoxide:	max. 150 ppm - 250 ppm
Manganous oxide:	max. 100ppm
Other trace elements:	< 30ppm