



FEFANA position on the EFSA opinion on “Consequence for the consumer of the use of Vitamin A in animal nutrition”

Summary.

- Possible endpoint is a reduction of bone density in ageing women
 - Relationship with high Vitamin A exposure is suggested but not demonstrated
 - Population at potential risk is consumers of high amounts of liver highly concentrated in Vitamin A
 - Current feed levels in Vitamin A not seen to have an impact on livers with high Vitamin A concentration; reduction of feed levels cannot be seen as adequate precautionary measure
 - Possible cause suggested is uncoordinated use of multiple sources
 - FEFANA proposal is to keep limits unchanged and impose labeling constraints on complementary feed in order to avoid excessive exposure through multiple sources
 - If labeling proposal is not retained, FEFANA proposes a much more pragmatic revision of the feed limit than currently tabled.
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- Evaluation of vitamin A should preferably be part of the re-authorisation process under Article 10 of 1831/2003 (November 2010), in order to get a complete evaluation taking all aspects into account. No safety issue requiring urgent action was identified
 - The potential risk identified in the EFSA opinion is the possible relation between high vitamin A intake and decreased bone density in women. However, all evaluations carried out up to now, including the EFSA opinion, agree that there is not sufficient scientific evidence to conclude that a high vitamin A intake causes low bone density.
 - The FEEDAP reports highlights that the possible concern lies with high liver consuming population consuming livers highly concentrated in Vitamin A.
 - The Feedap confirmed that average exposure was not a cause for concern. One should furthermore pinpoint the fact that the Feedap report did not address potential low intake of Vitamin A (below dietary recommended dose) by a significant proportion of the population, which could be equally detrimental to the population as a high intake (Figure 1).
 - While implicitly recognizing that it shall have no impact on the high-exposure population at stake, the FEEDAP recommends as a precautionary measure to decrease the maximum permitted levels of vitamin A in complete feeds. It provides no risk assessment analysis and makes no recommendation as regards the (ca. 3%) high-exposure population. Before taking any radical measures EFSA should carry out studies to explain the source of the high vitamin A content in some livers, in order for the risk managers to be able to identify measures that will indeed have impact on consumer intake of vitamin A.

- Rather than setting new limits on weak grounds, a more appropriate measure would be to impose an additional mandatory labelling of complementary feeds. One of the reasons for higher intake is seen by the FEEDAP as being the uncoordinated use of multiple sources/types of feed containing vitamin A. This perception looks plausible to FEFANA. All complementary feed should be labeled with the percentage of the maximum allowed amount of vitamin A in complete feed when used at the recommended inclusion rate. The farmer can then easily assure that the max level of vitamin A is never exceeded in the total diet given to the animal. FEFANA believes that this measure may decrease the amount of livers with very high vitamin A content and so be an adequate precautionary measure.

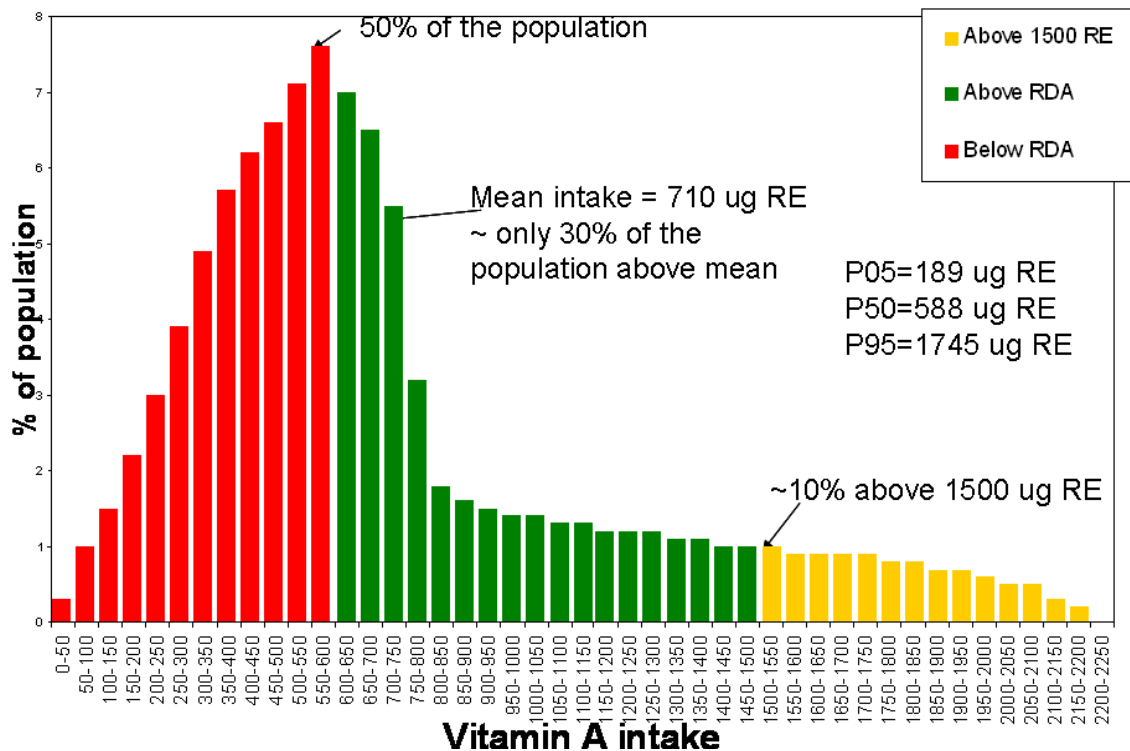


Figure 1. Shows a distribution curve corresponding to the data of vitamin A intake of German women reported in the yet unpublished ILSI report. The figure illustrates that a) the median intake of the population is very different from the mean b) 50% of the population has an intake of preformed vitamin A below the recommended daily allowance (RDA). Decreasing the max content of vitamin A in feeds will most likely decrease the vitamin A intake coming from milks and eggs, which most likely is the primary source of preformed vitamin A in the part of the population already eating below RDA. i.e. to protect a small part of the population against a possible risk 50% are put at a potential risk of getting too little vitamin A.

- Should the Standing Committee however decide to proceed instead with the revision of the limits in complete feed FEFANA is strongly opposed to departing from the animal categories system put in place under Regulation 1831/2003 and 429/2008 (e.g. creating new categories as chicken up to 14 days etc.) to multiplying the number of categories subject to specific restrictions.

- In the perspective of such a revision of the limits FEFANA would recommends a much more pragmatic approach using one value covering the need for all animal categories (429/2008 annex IV) that enter the food chain, and with an exemption for the young animals as also mentioned in the current authorisation (70/524). This would at least help to solve practical implementation problems for both premixtures and feed products

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