



**FEFANA position regarding the draft Commission Regulation of defining acceptability criteria for detoxification processes in application of Article 8 of Directive 2002/32/EC of the European Parliament and of the Council of 7 May 2002 on undesirable substances in animal feed (SANCO/6448/2009 – revision 3)**

Dear Mr Verstraete,

FEFANA has held a first contemplation to digest this draft legal act. The proposed regulation is well appreciated by FEFANA as a new piece to ensure the safety of the whole feed chain and considers this purpose as important.

However, FEFANA understands that the proper implementation of this future law relies on the approval of detoxification processes at Member States level. FEFANA is in favour of a harmonised system at Community level for the evaluation and the acceptance of processes used for detoxification - and advocates the creation of a European procedure and guidelines for such authorisation.

FEFANA suggests that the use of chemical substances and microorganisms for detoxification of feed shall be part of the process evaluation (indeed, the substance used is part of the process) and therefore a reference to the authorisation of the substance for that purpose is not appropriate.

Finally, based on the practical experience, the detoxification processes should be limited to feed materials as defined in the Regulation No 767/2009. Indeed, the use of contaminated materials is not allowed to feed millers according to Directive 2002/32; feed materials should therefore be detoxified before being included in a compound feed.

FEFANA is continuing to discuss this purpose and will be delighted to soon come back to you with further concrete comments.

Yours sincerely

Didier Jans  
Secretary General  
FEFANA Asbl