

## **Replacement of the current annex to Directive 2002/32/EC on undesirable substances in feed integrating all amendments since 2002**

### **FEFANA Position**

- According to FEFANA, each undesirable substance maximum content related to feed additives should be dealt by the feed additive authorisation itself.

- FEFANA welcomes the more appropriate use of products' description in line with legal definitions foreseen within Regulations (e.g. term « additives » is replaced by « feed additives »; term « feedingstuffs » is replaced by « feed materials »).

- In previous versions, all feed additives belonging to the functional groups of binders and anti-caking agents had a maximum limits established for sum of dioxins and dioxin-like PCBs. Now, the maximum limit is restricted to concrete feed additives (kaolinitic clay, calcium sulphate dihydrate, vermiculite, natrolitephonolite, synthetic calcium aluminates and clinoptilolite of sedimentary origin) and FEFANA welcomes this new approach.

- "Feed" is subject to maximum limits for the following undesirable substances: aldrin and dieldrin chlordane, DDTs, endosulfan, endrin, heptachlor, HCB, alpha-isomers of HCH and gamma-isomers of HCH and the whole section VI (botanical impurities).

As the term "Feed" also refers to feed additives and premixtures, we would like to make sure that it is the intention of the legislator to set up maximum limits of these substances for feed additives and premixtures. There are no rapports of these undesirable substances in feed additives and premixtures, thus FEFANA wonder if it should be precised which specific categories of feed are subjected to maximum limits of undesirable substances in these cases.

-Use of footnote:

The footnote should be at the end of each section.

Regarding the table with the TEF (toxic equivalency factors) values, FEFANA would prefer not to have this table included in the document, as it makes it cumbersome. The reference laboratories that control the feedingsutffs are aware of this reference factors and there is no need to include them in the Directive. It would be better to have in the footnote a reference to the analytical method to be used for control for a matter of clarity and transparency.