

FEDIOL code of practice on the safety of vegetable fats and oils in feed with regard to dioxin and dioxin-like PCBs

FEDIOL and its members respond herewith to the call by the Commission services to develop an approach on enhanced monitoring of dioxin and dioxin-like PCBs in oils and fats products for feed application.

FEDIOL's objective is to keep confidence by demonstrating control of dioxin levels in products resulting from crushing and refining processes and by thus confirming the risk assessments of the various product/process combinations as laid down in the FEDIOL risk assessments. These assessments are an integral part of the EU Guide to good practice for the industrial manufacture of safe feed materials as recognized by the Standing Committee on the Food Chain and Animal Health in July 2010.

The most recent dioxin contamination in vegetable feed fats for pigs and poultry in Germany called on feed chain partners to verify the systems in place and to identify possible gaps to be addressed either by the industry itself or by public authorities. It must be noted that the precise contamination pathway is still under investigation.

The FEDIOL voluntary Code covers the crushing of oilseeds and refining of vegetable oils, the process which is outlined in the chart under **Annex III**. FEDIOL represents 85% of EU's crushing and refining capacities.

This approach is consisting of the elements as listed below:

1. Enhanced monitoring scheme on dioxins and dioxin-like PCBs

The enhanced monitoring scheme for the analysis of samples taken in the vegetable oilseed crushing and vegetable oil refining industry is contained in **Annex I**. The first evaluation of this scheme will be after three months and will be followed by an evaluation frequency of at least once a year.

2. Precautionary exclusion of products for use in feed

Annex I indicates which products are voluntarily banned by Fediol companies from the use for feed applications, because their feed safety cannot be guaranteed.

3. Products requiring additional processing

Annex I also indicates which products require an additional cleaning step before they can be applied for feed or food.

4. Clear product labelling

FEDIOL proposes a uniform and clear approach to the labelling of vegetable oils and fats (/products) in order to ensure proper handling in the supply chain and to minimize risk (**Annex II**).

Annex I: Enhanced monitoring scheme on dioxins and dioxin-like PCBs¹

Scope

The monitoring scheme covers the oils and fats products from oil seed processing and vegetable oil refining applied for feed.

Analysis

Analysis should be performed by officially recognized methods of analysis as laid down in Commission Directive 2002/70/EC (as amended by Directive 2005/7/EC) establishing requirements for the determination of levels of dioxins and dioxin-like PCBs in feeding stuffs and as laid down in the Directive on dioxin screening (Directive 2009/152).

The laboratory performing the analysis should be accredited by ISO 17025 with oil, fats and fatty acids (/distillates) as scope.

Monitoring frequency

Companies will apply 100% monitoring on products in which dioxins may have been concentrated during processing.

Companies will conduct at least a quarterly monitoring on products where dioxin and dioxin like PCBs is not found to exceed the legal limit as shown by monitoring.

Data collection

All monitoring results will be collected by FEDIOL.

Evaluation

Three months after date of entry of this monitoring plan, the risk classification thus also the analysis frequency will be subject to evaluation.

Alignment on the monitoring with regard to implementation will be sought with other feed chain sectors and such date of implementation will anyhow be set at 1 April 2011.

¹ This monitoring scheme has been drawn up in liaison with the Dutch Product Board MVO, the latter which carried out a wider plan for the Dutch fats and oil sectors

1 Crushing of oil seeds and refining of oils		Palm	Palm kernel	Rape seed	Soya bean	Sunflower seed	Coconut ²	Groundnut	Linseed	Maize	Shea kernel	Safflower	Sesame	Walnut	Cottonseed	Castor bean
Processes and products ¹	Description															
Pressing and extraction																
Crude oil/fat	Oils and fats from pressing/extraction	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Degumming																
(partially) degummed oil/fat	Oils treated to remove gums/lecithin			X	X	X		X	X			X	X	X	X	X
Lecithin				X	X	X		X	X			X	X	X	X	X
Storage																
Tank bottom	Viscous, solid remains on the bottom of a tank	T	T	T	T	T	T	T	T	T	T	T	T	T	T	T
Physical refining																
Refined oil/fat and other edible products	Oils/fats treated to remove colour, odour and off taste	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Fatty acid distillates ⁴	Distillate from deodorization of physical refining	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Hydrogenated palm fatty acid distillates	Palm fatty acid distillate, hydrogenated	X														
Chemical refining																
Refined oil/fat and other edible products	Oils/fats treated to remove colour, odour and off taste	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Soap stock and acid oils	Caustic soda refining and soap stock splitting	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Deodistillates ³	Distillate from deodorization after chemical refining	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F

- ¹ In case of mixing of products (for instance by products from physical and chemical refining) the monitoring regime of the fraction with the highest monitoring frequency applies

- ² Based on actual monitoring results, low levels of dioxin could be present in crude coconut oil. The source can be environmental pollution.

- ³ The EU Guide to good practice for the manufacture of safe feed materials, oilseed crushing and oil refining lays down that deodistillates from chemical refining are not to be sold for feed applications without further processing

- ⁴ FEDIOL makes a distinction between two different types of fatty acid distillates: manufactured with and manufactured without a validated dioxin removal step

- X = Products for use in feed; T = Products which should not be in the Food/Feed chain; F = Products which requires further processing before being applied for feed

Monitoring frequency:	Not allowed for feed	Dioxin possible: 100% monitoring	Dioxin highly unlikely: once every three months
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Annex II Labelling of vegetable oils and fats (/products) sold to third parties by oilseed crushing and oil refining companies

The labelling of oils and fats products as referred to below is to appear on all relevant documents, including contracts and shipping documents.

A. Not be used in the Food/Feed Chain

These products refer to those indicated with a "T" in the monitoring table.

"Name of Product" and in addition the notice "not suitable for use in the Food or Feed Chain" and at a minimum batch/lot number & Manufacturer's name and address.

Contracts should refer to the following: The goods described under and sold pursuant to this contract of sale are not for "food" or "feed" purposes. The Buyer hereby agrees not to use the goods in any food or feed application, either directly or after any further processing of the goods. In case of resale of the goods, buyer agrees to include this clause in any contract for the sale of all or any of such goods including this obligation.

The requirements under REACH and CLP regulations when selling products for non-food, non-feed applications are to be met as well.

B. Further processing required to comply with Food/Feed Law

These products refer to those indicated with a "F" in the monitoring table.

"Name of Product" and in addition the notice "requires further processing to meet EU Feed/Food Law requirements".

Contracts should refer to the following: The goods described under and sold pursuant to this contract of sale are not "food" or "feed". The Buyer hereby agrees not to use the goods in any food or feed application, either directly or without further processing of the goods. In case of resale of the goods, buyer agrees to include this clause in any contract for the sale of all or any of such goods including this obligation.

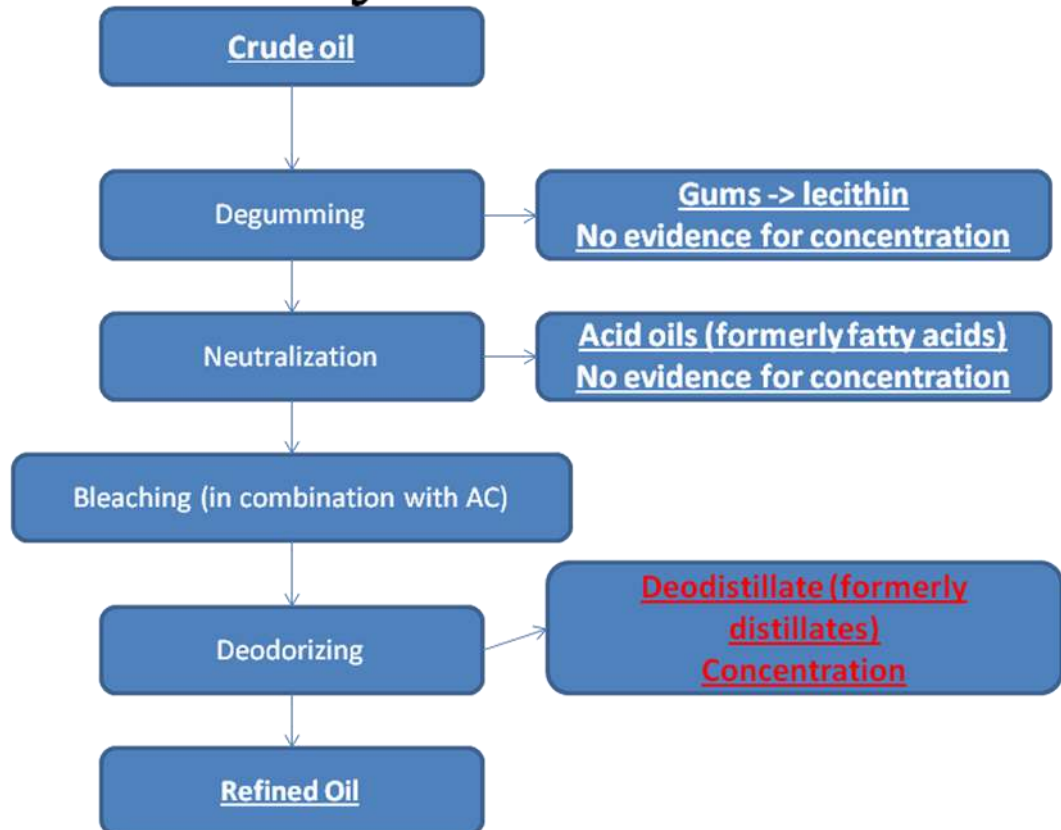
C. Feed

- "Name of Product" as listed under the EU Feed Catalogue and in addition the term "Feed Material" plus all relevant labelling information required under Regulation N° 767/2009

Implementation of labelling provisions will be sought as soon as contracts and IT modifications allow. Members to inform the FEDIOL secretariat in case they will implement the labelling provisions at a later date than 1 April 2011.

Annex III Flow charts refining; chemical and physical

Refinery - Chemical



Refinery - Physical

