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From
Director-General, Food Safety and Consumer Affairs Bureau
Ministry of Agriculture, Forestry and Fisheries (MAFF)

To
Director, Japan Feed Trade Association

Subject: Establishment of New Guidelines for Prevention of Intermixing of Animal
Origin Proteins in Ruminant Feeds

The “Guidelines for Prevention of Intermixing of Animal Origin Proteins in Ruminant Feeds” (Notification No. 13 *Sei-Chiku* 1366 by Director-General, Agricultural Production Bureau, MAFF, dated June 1, 2001; hereinafter referred to as “Old Guidelines”) were originally established to strictly prevent the occurrence of bovine spongiform encephalopathy (BSE). The Ministry's goal in issuing these guidelines was the total prevention of the intermixing of animal proteins originating from ruminants and other animals in feed meant for ruminants (meaning cattle, sheep, goats and deer: and this meaning hereinafter) at formula feed manufacturing plants. The Ministerial Ordinance Concerning Standards for the Components of Feeds and Feed Additives (Ordinance No. 35, MAFF, 1976; hereinafter referred to as “the Ministerial Ordinance”) has been partly amended to separate the production process of ruminant feeds from the production process of feedstuffs containing protein of mammalian origin. In line with this amendment, the New Guidelines on Prevention of Intermixing of Animal Origin Proteins in Ruminant Feeds, given in the Annexure, have recently been established. The Ministry requests the assistance of all concerned parties in ensuring that the New Guidelines become widely known.

Under the New Guidelines, feed manufacturers currently producing ruminant feeds using production processes that are also used for production of feedstuffs containing animal origin proteins are permitted to follow the old guidelines until March 31, 2005. However, to take all possible measures for the prevention of BSE and related diseases, it is desirable to advise the concerned parties to comply with the New Guidelines as soon as possible.

Annexure

Guidelines for Prevention of Intermixing of Animal Origin Proteins in Ruminant Feeds

I Objective

These are basic guidelines on management measures to prevent intermixing of animal origin proteins with ruminant feeds, at various stages of production, importation, distribution, storage, feeding, and handling of feeds and feed additives (hereinafter referred to as “feedstuffs”), so that everything possible is done to prevent the occurrence of transmissible spongiform encephalopathies such as bovine spongiform encephalopathy (BSE) and related diseases.

II Definitions

Except for the terms defined below, the definitions of terms used in these guidelines are the same as those in the Law Concerning Safety Assurance and Quality Improvement of Feed (Law No. 35 of 1953, hereinafter referred to as “the Law”) and related laws and regulations.

1. Category A Feed

Feedstuffs and their raw materials that are intended to be fed, or that may possibly be fed, to ruminants (meaning cattle, sheep, goat and deer; and this meaning hereinafter), are to be handled in a manner to prevent intermixing of any animal origin protein or related material.

2. Category B Feed

Feedstuffs and their raw materials, other than those designated as Category A Feeds.

3. Animal Origin Protein

This category includes those listed below. However, the following are excluded: milk and milk products, eggs and egg products; gelatin and collagen approved by the Minister, MAFF; fats not originating from ruminants; and specific animal origin fats specified in attached table 1-4(1) of the Ministerial Ordinance.

- (1) Protein originating from mammals
- (2) Protein originating from poultry
- (3) Protein originating from fish and shellfish
- (4) Animal fat
- (5) Animal origin protein sourced from food residues
- (6) Feed additives (limited to those containing substances listed under (1) to (5) above)

4. Containers

Holds of ships, barges, cargo containers, bulk carts, transport bags, shovels, buckets, PP bags, paper bags, and other containers that come into direct contact with feedstuffs and their raw materials, which are used for their transportation or storage.

5. Cleaning

- (1) Cleaning by sweeping
The procedure of removing residues from a facility, installation, implement, or

the like, cleaning it, and confirming, by visual inspection, swabbing, or other methods, that no residues remain.

(2) Cleaning by washing

The procedure of removing residues from a facility, installation, implement, or the like, cleaning and washing it (washing with a cleaning solution or washing to achieve an equivalent effect), and confirming, by visual inspection, swabbing, or other methods, that no residues remain.

6. Conveyance

The moving of feedstuffs and their raw materials within the premises of a facility or between facilities, using different modes of conveyance.

7. Sub-dividing

Sub-dividing feedstuffs and their raw materials, and changing the packaging to suit the needs of consumers.

III Basic Guidelines

In order to do everything possible to prevent BSE and related diseases, it is necessary to take measures to ensure that no feed containing animal origin protein is fed to ruminants. On the other hand, it is very difficult to avoid giving feeds that contain animal origin protein to animals other than ruminants. Therefore, it was decided to adopt suitable means, such as ensuring the isolation of Category A and Category B feeds by appropriate methods, to effectively and efficiently prevent intermixing of animal origin protein in Category A feed at each stage of feed production and use, i.e., production, importation, distribution, storage and feeding.

If a person/party who manufactures, imports, distributes, stores, or provides such feedstuffs does not carry out the actions described in Guidelines 1 and 2 above, but instead commissions some other party to do so, said person/party should enter into an agreement with the party actually undertaking the work to ensure implementation of the necessary measures, and regularly check and verify that the agreement is adhered to.

1. General Rules

- (1) Adopt suitable measures so that no Category B feed, or animal origin protein is intermixed with feedstuffs to be used as Category A feed at any stage of production, importation, distribution, storage, or feeding.
- (2) If Category B feed, or animal origin protein is intermixed with feedstuffs to be used as Category A feed, or if there is a possibility that such intermixing may have occurred, recall and appropriately repurpose or discard the feedstuffs to ensure that they are not used as Category A feed.
- (3) Adopt suitable measures so that no meat-and-bone meal derived from ruminants or the like is contained or intermixed with feedstuffs to be used as Category B feed at any stage of production, importation, distribution, storage, or feeding.

- (4) If Category B feed, or animal origin protein is packed in containers intended for use with Category A feed, clean the containers by washing without delay.
- (5) If Category B feed, or animal origin protein is passed directly through a site where Category A feed is handled, clean the site by washing without delay.
- (6) Regularly clean, inspect and test the facilities, installations, premises, machines, devices and environments where feedstuffs or their raw materials are handled.
- (7) After workers have handled Category B feed, or animal origin protein, ensure that they change their clothes or use air blowers or other means to remove any residue adhering to their hands, feet, clothing, or footwear before they handle Category A feed.
- (8) When facilities, equipment, or machinery that has previously been used for handling Category B feed, or animal origin protein is to be converted for use with Category A feed, implement the following procedures:
 - Clean by washing.
 - After cleaning by washing, check that no animal origin protein is contained in the first lot of Category A feed handled by the facility, equipment, or machinery
- (9) Always use a washing method whose cleansing efficacy has previously been thoroughly verified.

2. Detailed Rules

1) Conveyance

- (1) See that the conveyance route of Category A feed is not common with the conveyance route of Category B feed, or of animal origin protein.
- (2) Use exclusive containers for conveying Category A feed, and in principle make the conveyance system an enclosed system, by providing, for example, a suitable cover over the conveyance route. If the system needs to be left open for any reason, take measures to prevent intermixing of Category B feed, or animal origin protein.
- (3) Rules (1) and (2) above are not applicable to facilities from which Category B feed alone is shipped, nor to farms where no ruminants are raised.

2) Production, Sub-dividing, etc.

a. Facilities for production, etc.

In principle, make production and handling systems for Category A feed enclosed systems, and when they need to be left open for any reason, take measures to prevent intermixing of Category B feed, or animal origin protein. When it is impossible to make production and handling systems for Category A feed enclosed systems, set them up at locations sufficiently removed, or separated by a wall or partition, from facilities handling Category B feed, or animal origin protein to prevent intermixing.

b. Packaging facilities, etc.

- (1) Make sure that packaging facilities for Category A feed are not common with those of Category B feed, or animal origin protein.
- (2) Set up packaging facilities for Category A feed sufficiently away, or separated by a wall or partition, from packaging facilities handling Category B feed, or animal origin protein to prevent intermixing.
- (3) Use exclusive containers for packaging Category A feed products.
- (4) With all packaged feedstuffs, confirm that the containers used for packaging have no tears or other damage.

3) Transportation

- (1) For transporting Category A feed, use exclusive containers that bear displays stating that they are exclusively meant for Category A feeds or ruminant feeds. In the case of containers such as bulk-loading ships, marine containers, barges, and the like where exclusive use is not possible, clean by sweeping before loading Category A feed. Moreover, if some residue of Category B feed, or animal origin protein is noticed, take preventive measures against intermixing, such as cleaning by washing, before use.
- (2) With regard to containers used for Category A feed, store transportation bags and other containers that are reused separately from containers used for transporting Category B feed, and clean by sweeping or washing regularly, as well as before use.

4) Receiving

- (1) When receiving Category A feed, confirm by checking the bill of lading or other documentation that the feed concerned has indeed been handled as Category A feed.
- (2) Minimize the scattering of dust and particulate matter.
- (3) Do not receive Category A and Category B feed simultaneously or one immediately after the other.
- (4) Keep the receiving point (meaning chute, unloading dock, or other offloading point; and this meaning hereinafter) of Category A feed away from receiving points for Category B feed, or animal origin protein. However, this rule need not be applied if packaged feedstuffs are received without opening the seal and the unloading site for Category A feed is clearly separated from that of Category B feed, or animal origin protein.
- (5) Make containers used for receiving the feed, as well as implements such as brooms that come into direct contact with Category A feed, exclusive. Clean by washing before using unloading devices and other equipment that cannot be made exclusive.
- (6) (1) to (5) above are not applicable to facilities from which only Category B feed is shipped, nor to farms where no ruminants are raised.

5) Storage

- (1) Use exclusive containers or exclusive storage locations for storing Category A feed.

- (2) Adopt suitable measures such as color-coding or the use of signage displaying target animals to eliminate human error during shipping and handling operations at feed storage sites and other facilities.
- (3) (1) and (2) above are not applicable to facilities from which only Category B feed is shipped, nor to farms where no ruminants are raised.

6) Shipping

- a. Shipping and handling of unpackaged products
 - (1) Use exclusive outlets for loading loose Category A feeds into containers such as bulk carts used for transportation.
 - (2) Keep outlets for Category A feed sufficiently away from outlets for Category B feed, and animal origin protein, or separate them by a wall or partition to prevent intermixing.
- b. Shipping and handling of packaged products
 - Ship packaged Category A products separately from Category B feed, and animal origin protein.

7) Feeding

- (1) Do not feed Category B feed to ruminants.
- (2) Use exclusive implements for feeding Category A feed to ruminants.

IV Management system

1. Management of Business Operations

- (1) Formulate Feed Operation Management Rules and document them in order to effectively and efficiently implement the basic guidelines stipulated in 1. and 1) to 6) of 2.
- (2) Maintain detailed records of management operations relating to Feed Operation Management Rules and their verification, and store the records for 8 years.
- (3) The Feed Production Controller stipulated in Article 25 of the Law should manage practical implementation so that operations are managed according to the Feed Operation Management Rules.
- (4) In plants where a Feed Production Controller is not required, designate a person to be in charge of measures to prevent intermixing, and ensure that the designated person manages operations according to Feed Operation Management Rules.
- (5) (1) to (4) above are applicable to manufacturers and dealers.

2. Quality control

- (1) Regularly test whether there is any intermixing of animal origin protein or related materials with Category A feed to verify that the management of operations is effective, and to control the quality of the Category A feed.
- (2) Formulate Feed Quality Control Rules for (1) above and document them.
- (3) Maintain detailed records of management operations relating to Feed Quality Control Rules and their verification, and store the records for 8 years.

- (4) Designate a person to be in charge of quality control, and ensure that the designated person manages the quality control procedures according to the Feed Quality Control Rules.
- (5) (1) to (4) above are applicable to manufacturers of feed and related products.

V Interim measures

Feed manufacturers who currently manufacture ruminant feeds using the same process used to produce feeds containing protein originating from mammals, poultry, fish and shellfish are permitted to continue to follow the Old Guidelines until March 31, 2005.