



feedback

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PDV chairman on tightening of sanction policy: "Exclude cheats for life"

Since the 1st of July this year, animal feed companies risk losing their GMP+-certificate immediately if they intentionally contravene GMP+- or other legislation. Measures will also be imposed if companies are negligent in carrying out recall procedures or lack a proper awareness of quality. "Undesirable practices must be eliminated from the sector," says PDV chairman Theo Meijer.

From now, companies can lose their GMP+-certificate immediately for a year if they breach important GMP+-

or other obligatory legislation. The product board will however continue to intensify the sanctions. Meijer: "We are currently modifying the rules surrounding sanctions to make it possible to revoke a GMP+-certificate for life from now on. We are also investigating the possibility of imposing financial sanctions. And the fines will be so high that companies will really feel it in their pockets."

Extra audits

This intensification also includes the possibility of additional audits. In a calamity, the product board can carry out extra audits immediately using an audit team assigned by the PDV. This

team may consist of auditors from the certification bodies, external experts and experts from the product board. In addition, the functioning of certification bodies will be further improved by differentiating in the findings discovered at companies and the measures to



Theo Meijer wants to eliminate undesirable behaviour from the sector

be taken. Inspections of road transport of feed materials will also be modified, including more controls when the products enter the buyer's premises. PDV and Transport and Logistiek Nederland will shortly be running a pilot of this system.

Damaged image

Part of the reason behind these measures is the experience of the past two years. According to Meijer, the current measures could not have prevented these incidents, but they considerably reduce the risk of them occurring. "By not ignoring undesirable behaviour, we show companies our zero tolerance towards fraudulent practice. Companies that deliberately breach the regulations or show gross negligence, cause so much damage to the image of the animal feed sector, that they must be punished and excluded from the sector."

GMP+ complements EU-regulations

GMP+ is a good foundation for adherence to the EU-regulation relating to animal feed hygiene. This is the conclusion reached by the Agricultural Economics Research Institute (LEI) in an article in Agri-Monitor, a publication released periodically by the research institute. The EU-regulation will be enforced from 1 January 2006. The regulation means that companies will have to accept more accountability.

The LEI article was written in response to a workshop about the practical difficulties involved with risk management in the animal feed chain. Participants in the workshop included representatives from the animal feed sector and researchers at Wageningen UR.

Increased differentiation

For the sake of transparency there is an urgent need for international standardisation of quality demands and audits within quality assurance systems and on companies concludes the LEI in the article. They also state that a solid inspection and sanction policy is "absolutely essen-

tial". In order to monitor observance of the new animal hygiene regulation the demands laid down must be clear, specifically defined, measurable and realistic. Auditors must be independent and expert. They recommend introducing greater differentiation into the sanctions imposed in the event of non-observation. For lighter 'offences' mild sanctions, for heavier 'offences', stricter sanctions. They also advise introducing a bonus-malus system with differences in inspection frequency. Companies with sound quality assurance systems, would be subjected to fewer audits and therefore pay less.

"Everyone must accept responsibility"

The sector meeting of the Product Board Animal Feed on 24th May in Rotterdam received a lot of attention. There were more attendees than expected and discussions during the meeting were frank and open. The topic quality assurance in chain driven production was obviously a popular choice for the more than 240 directors and quality managers from the animal feed sector.

The aim of the second sector meeting was exchanging knowledge and experience relating to quality assurance in the animal feed sector. Quality assurance begins with GMP+ and although the system has been intensified, there were critical notes. Particularly about double audits by various companies. According to PDV General Secretary Johan den Hartog work is in progress on better harmonisation of audits, a single - international - certificate and an arrangement with the government ensuring that government inspections take the efforts of businesses into



Discussions during the meeting were open and frank

account. PDV and the German QS system have already taken a step in this direction. "The pressure from the government to carry out inspections will however remain and will not lessen, until such a stage that all in the sector have proved that they are bearing enough responsibility regarding quality and safety", according to Den Hartog.

Failure to understand

The way in which politics and the media deal with crises within the sector was a hot item during the afternoon. Information given is often misinterpreted and incorrectly reported to consumers. And the general public is highly susceptible to media signals, as we know. Consumers have short memories, but remember incidents. The fear of BSE, salmonella and the MPA affair is still alive and kicking in the collective memory. Many of those present failed to understand why the media in these cases often only concentrate on the animal feed sector. However, little attention was paid to why this actually happens to the

Revised GMP+ more efficient

From 1st January 2006 the Product Board Animal Feed will apply an entirely revised GMP+-system for the animal feed sector (GMP+ 2006). The most important changes are simplification for companies, more effective sanctions, standardisation of audits, reduction of the number of obligatory procedures and international accreditation of certifying bodies.

The new quality assurance system is more transparent thanks to the harmonisation of various standards. Imposing measures and sanctions will now also be simpler thanks to a better structure, comparable to IKB-regulations. In addition, the PDV can now give binding advice to certification bodies if they suspect that companies are infringing regulations - for instance by calling for an immediate audit.

The revised GMP+-system also simplifies procedures, as the standards for production of compound feeds, pre-mixes, feed materials and additives have been integrated into a single new standard. This means less obligatory paperwork for companies that are active on several fronts. This reduction in procedures was achieved by removing double procedures and

bundling the conditions for purchasing. This last also applies to the safety demands placed on products and the monitoring conditions.

International harmonisation

The revised GMP+-system complies with the latest demands for quality management, risk assessment and European legislation. The quality assurance system is adapted to the new HACCP-certification scheme for the food production industry. The EU animal hygiene regulations, which come into force as per 1st January, have also been integrated in the system. This means participants in the GMP+ 2006 new style automatically comply with the demands of the animal hygiene regulations. The system also reacts to the implementation of the IFSA standard for the production of feed materials. This international, joint standard will replace the current standard within GMP+. From now on, European instead of national legislation will be referred to in the certification scheme.



Speaker Johan den Hartog

animal feed sector. According to Den Hartog, in the past the sector allowed incidents to happen without reacting quickly enough. With the current sector image as a result. The only correct response is not to complain, but to shoulder the responsibility for actions as a sector and as individual companies. This action has been taken with the intensification of the GMP+-regulations. In addition, companies must stay alert and react to situations adequately. Unloading responsibility onto preceding or subsequent links in the chain doesn't help. Imposing sanctions on offenders and speaking with one voice to the media does. Research shows that transparency

and honesty have a positive influence on the consumers' perception.

Positive talk

The image also received positive impulses as the sector has paid great attention to international quality assurance. The PDV is lobbying on a global scale for feed safety and better harmonisation using, for instance, the European standard for the production of feed ingredients (International Feed Safety Alliance IFSA) and the General Food Law. However, quality is only as good as the weakest link in the chain. And now is the time to reinforce those links. In the meantime, the animal



The sector meeting was well attended

feed sector can maybe tread into the spotlights a little more often as far as consumers are concerned, stated PDV chairman Theo Meijer in his closing speech. "And be more positive about itself."

GMP for forage products

The cultivation of forage has been certified. Since 1st July GMP+-certified companies can buy forage that has been grown according to GMP 11-conditions either from growers certified in compliance with GMP 11 or from growers complying with GMP-worthy standards.

Forage sown before 1 July 2005 may be bought from growers with whom a contact has been made. GMP 11 is the GMP+-standard for the cultivation of forage. This will become obligatory from June 2006 and the entire harvest will be fully certified (from the purchase of seeds/plants). This obligation to only buy from GMP 11-certified growers will also be included in the IKB/KKM programmes.

Demonstrable assurance

During an audit, buyers of (unprocessed) forage must be able to demonstrate that the purchased goods are GMP+-worthy. This can be done by buying from GMP 11-certified companies or by the buyer - in consultation with grower - showing which quality assurance system is used by the grower (the so-called gate keeper principle). A risk assessment must obviously have been run on the purchased product (at the grower from sowing up to and including harvesting, including any further processing, storage and/or transport). There must also be an adequate incoming control



programme in place. The procedure must be defined in a contract with the grower. In this situation the final responsibility for the (quality of the) supplied product rests with the grower.

For more information and example contracts see the Question & Answer list Feed materials and Feed additives (question 15) at www.pdv.nl.

Transparency

Transparency in the chain supplies a wealth of information interesting to both the animal feed and the food branch. Transparency appears essential in view of the crisis situations that have occurred in both sectors over the past years. The question is, however, where do we set our limits as a governmental institute and the business world. Businesses have the right to a certain degree of 'privacy' and the government has the right to correct information. A good compromise must be found, to the satisfaction of both parties.

The Product Board Animal Feed has set an example in this respect, which I am quite happy with. As IFF we produce flavours, mainly for the food industry. IFF also supplies residual products to the animal feed industry. In my opinion, PDV's website is an example of a good form of transparency in the chain. IFF is also listed on the site with the name, address and risk analysis of the residual product.

At a recently held symposium about the rights and obligations of regulatory bodies and companies chain transparency was discussed in depth. What I noticed was that the speakers from the Food and Consumer Product Safety Authority (VWA) and other participants did not enter the discussions wholeheartedly. During the symposium I was surprised that governmental institutions apparently had to be made aware of the experience the PDV has with transparency. Instead of which, the VWA admitted it had carried out in-depth research in Denmark. Why isn't the available knowledge and experience benefited from more efficiently - there's no need to reinvent the wheel!

The PDV website provides information about products and companies. This is absolutely no problem, as long as you don't create a 'black list' which can be used to sanction companies, for example by publishing audit reports and discrepancies. Aspects should also be taken into account such as agreements made with companies concerning the publication of irrelevant matters.

The impression I was given was not one of well-intentioned information provision during the lecture given by the VWA at the symposium. The image lingers of people who are looking for mistakes made by the competitors and the flare up of a competitive battle between companies caused by the 'transparency' on the VWA's website. Transparency as a means of providing information is fine. Transparency as a means to sanction companies is, however, completely unacceptable!

ing. **Brenda Kerkdijk**
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Joint approach agricultural dust problem

The Product Board Animal Feed has joined forces with other product boards to help reduce exposure to agricultural dust and the subsequent damaging effects. Project worker Jessika van Leeuwen explains how she can help companies.

Jessika van Leeuwen visits companies where agricultural dust occurs on behalf of employer organisations and trade unions. She says: "Research shows that there is high exposure to agricultural dust within the arable, horticultural, cattle and meat and egg production sectors. Breathing in too much agricultural dust poses a health risk, as the dust contains bacteria and mould particles. The dust is generated when working with crops or animals, during transport, processing and production of grains and animal feed, for example. But agricultural dust is also present in the mist produced by process water. Breathing in too much dust or mist or exposure for lengthy periods can lead to respiratory problems. Symptoms begin as seemingly innocent coughing and sneezing, but can turn into chronic complaints such as bronchitis, breathing difficulties and even asthma."

Practical solutions

The aim of the project is to prevent problems by reducing the level of exposure to agricultural dust. A checklist will be made available so companies can easily identify the risk areas. The checklist offers practical solutions for dust management. Van Leeuwen also visits companies where exposure is high to stimulate the introduction of

measures aimed at improving the situation. "Every improvement is a step in the right direction". The solutions are often practical ones, such as vacuuming up dust instead of blowing it away, placing extraction units and job rotating so the same worker is not exposed to dust the whole time." She emphasises that employers and employees share a joint responsibility in limiting health risks. "Employers are responsible for the health of their employees and have to implement

Safe Feed Safe Food

The Product Board Animal Feed uses the GMP+ system to facilitate an animal feed quality guarantee worthy of HACCP throughout the entire chain, from raw material to transport and livestock farming. Inspection and certification are carried out by independent organisations.

measures to safeguard this. Employees are responsible for observing these measures and for pointing out potential risks to their employer. We want to raise people's awareness, but ultimately they have to take steps to limit the risks of agricultural dust."

For more information or free advice about dust management in your company, mail: arbeid@hpa.agro.nl.



Jessika van Leeuwen (l) during a company visit

PDV recognises VKL-contract workers demands

Forage growers who use contract workers with a VKL-certificate (Food Quality Contractors), comply since 1st July with the contract workers standards of the GMP+-standard cultivation feed materials. The Product Board Animal Feed and the Pro aCt foundation, developers of the VKL-standard, have agreed this. Growers often contract out work to contract workers. They are unable to be awarded a GMP-certificate, but can obtain VKL-certification, which includes standards for fertilisers, crop protection, the use of well-maintained, clean machinery and what to do in the event of calamities.

Less paperwork

Thanks to the GMP+-acceptation, growers using VKL-certified contract workers can rest assured that the forage is cultivated correctly and safely. This acceptation also means less paperwork for growers, as they now only have to prove that they work with VKL-certified contract workers. It suffices to keep a copy of the VKL-certificate in the paperwork or by mentioning the VKL-certified contract worker on the website www.vkl.nl. This site also contains more information about the VKL-certificate.

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