CCFICS – Food Fraud EWG – Animal Feed Options

Section 2, Paragraph 8 of the current draft guideline circulated to the CCFICS Food Fraud EWG contains the following text:

> 8. The purpose is to provide guidance to competent authorities and FBOs on the prevention, detection, mitigation, and control of food fraud to help protect the health of consumers, and to ensure fair practices in food trade, **[including, as appropriate, feed for food producing animals.]** Aspects related to food fraud are already addressed through many existing Codex texts; this guidance is intended to support or supplement existing Codex texts by providing additional guidance specific to food fraud that can be considered within NFCS. Issues related to intellectual property are not included in this document.

Question to EWG:

> *Should this guideline on the prevention and control of food fraud include or make reference to "feed for food producing animals"?*
>
> *Please feel free to choose one of the three options below and provide a rationale for your answer. If your preference is not represented by one of the three options, then please provide an alternative path forward along with a rationale for your answer.*

Proposals from the EWG Chair and Co-Chairs for consideration by the EWG:

> **Option 1: Keep 'as appropriate' (or use 'when applicable') in the text.** (Keep 'As is' or minor modification to current text.)
>
> **Option 2: Add a footnote to the first use of FBO that references the definition of FBO from CXC 1-1969**.
>
> > The footnote would read: "*FBO as defined in the 'General Principles of Food Hygiene (CXC 1-1969)': Food business operator (FBO): "The entity responsible for operating a business at any step in the food chain."*
>
> **Option 3: Remove the reference in the text all together**.

CCFICS – Food Fraud EWG – April 2026 Animal Feed Responses

Member Countries: Costa Rica, Mexico, Republic of Korea, Japan, EU, New Zealand, Spain, Germany, Argentina, US, France, Thailand, Canada, United Kingdom, Brazil, Norway, Indonesia, Australia
Observer Organizations: ICBA, THIE, IFIF

	Response	Chair/Co-Chair Comments
Codex Member Countries		
	SUMMARY Member Country Responses received (total) = 18 • **Option 1** = ~~IIII~~ IIII + Modifications to Option 1 = II • **Option 2** = II • **Option 3** = ~~IIII~~ Out of the 15 member countries that responded, 11 members showed preference for **Option 1** as written or with slight modifications.	

	Response	Chair/Co-Chair Comments
	Members in favor of Option 1, note that fraud affecting feed may have a significant impact on food of animal origin and directly impact the safety of the final food product and the health of consumers and so should be included in this guidance document. However, a high level is sufficient and more detail could be found in Codex text specific to animal feed. **Option 2** was supported by 2 member countries. Partial support was noted by two other members with either modifications to the footnote or in the instance where the reference within the text is deleted. Some members included comments stating that the definition of FBO may not be clearly understood or defined as including feed businesses. **Option 3** was supported by 5 members. Members in favor of Option 3, note issues of including animal feed as creating overlap with existing standards and creating ambiguity regarding the scope and responsibilities of competent authorities and food business operators. An alternative offered was to make a reference to existing Codex text on feed in the preamble. Current Codex text on animal feed was also referenced as providing sufficient guidance by addressing adoption of good practices, addressing ingredients for animal feed, and labeling.	
Costa Rica	**Option 3** Costa Rica considers that it is not necessary to include a reference to feed for food producing animals within the scope of this guideline. While feed may have an indirect impact on food safety, this aspect is already addressed through existing Codex texts and other relevant international frameworks. Including feed within this guideline could create overlap, increase complexity, and go beyond the intended scope of the work) Costa Rica emphasizes that the primary focus of this guideline should remain on food intended for human consumption, in line with the Codex mandate on food fraud, which is centered on consumer protection and fair practices in food trade. While it is recognized that feed may have indirect implications for food safety, these aspects are already comprehensively addressed through existing Codex texts (e.g. CXC 54-2004, CXG 80-2013, CXG 81-2013) and other relevant international frameworks. Including feed within this guideline could create overlap with existing standards, increase complexity, and potentially generate ambiguity regarding the scope and responsibilities of competent authorities and food business operators. However, Costa Rica acknowledges that some Members consider feed relevant in the context of food safety. In this regard, if deemed necessary, a general reference to existing Codex texts on feed could be included in the preamble for contextual purposes, without expanding the scope of the guideline.	

	Response	Chair/Co-Chair Comments
	Ensure that the guideline remains focused on food fraud affecting products intended for human consumption. • Removing the reference provides a clear and well-defined scope, facilitating consistent implementation by competent authorities and food business operators. • **Operational feasibility:** A more focused scope supports better application within national food control systems without creating regulatory overlaps across different domains.	
Mexico	With regards to Para. 8, **maintain the text "…including, as appropriate, feed for animals intended for food production…**". It may be useful to include a mention of the need for coordination/ collaboration between public health and animal health authorities. Feed intended for food producing animals is part of the food production chain and may be vulnerable to fraudulent manufacturing and marketing. This possibility should be considered when developing policies and procedures for food fraud control, highlighting the need for coordination and collaboration among authorities.	
ROK (Korea)	ROK supports **option 2**, that suggest adding a footnote to the first use of FBO that references the definition of FBO from CXC 1-1969. Rationale: In the spirit of consensus, referring to the FBO definition would help clarify the scope of the guidelines. Unless there is a specific need to emphasize 'feed,' we believe it is appropriate to use this more inclusive definition.	
Japan	As Japan reiterates, feed is relevant to this guideline only when it has an impact on food safety and claims on food. If the scope is expanded to include feed, it should be limited within the necessity to protect the health of consumers. The current term 'as appropriate' sounds vague to clarify this point, so we suggest adding some words for further clarification, such as **'including feed for food producing animals, when it has an impact on food safety'**. Japan does not prefer option 2, as it seems not evident in CXC 1-1969 whether feed business is included in FBO or not. As long as we understand, 'food chain' is not clearly defined in CXC 1-1969. Therefore, adding reference to CXC 1-1969 may not help clarification on whether feed is included in the scope or not.	New text suggested: The purpose is to provide guidance to competent authorities and FBOs on the prevention, detection, mitigation, and control of food fraud to help protect the health of consumers, and to ensure fair practices in food trade, [**including feed for food producing animals, when it has an impact on food safety**].
European Union	*Please note that the comments of the EU as a member of this electronic working group do not prejudice the coordinated position officially and finally taken by the EU when requested by the Codex Secretariat* The European Union believes that **option 1** is the most appropriate one: Either as it is now on the text or by replacing 'as appropriate' by 'if applicable'. **Rationale**:	

	Response	Chair/Co-Chair Comments
	This guideline must include feed for food producing animals into the scope of document. Current food fraud frameworks typically focus on products intended for direct human consumption. However, modern food safety and integrity systems adopt a holistic approach, recognizing that risks introduced at early stages of the food chain, including feed, can propagate to food of animal origin. Whilst ensuring consumers' safety is a major objective of the Codex Alimentarius, fraud on feed for food producing animals may have an impact on the products thereof e.g. meat or milk and be a threat for food safety as a result. Feed supply chains are vulnerable to frauds, including substitution of declared ingredients with lower-value materials; dilution with non-compliant or contaminated substances; or misrepresentation of origin or composition. Such practices may be economically driven but can introduce chemical or biological hazards into the food chain and have also serious implications for animal health, and consumer trust. Fraud in feed can directly affect food safety through carry-over of contaminants (e.g., mycotoxins, dioxins) into meat, milk, and eggs; introduction of unauthorized substances that may persist in edible tissues; or compromised traceability, hindering risk management and recalls. Feed represents a foundational input in livestock production. Its omission would disrupt end-to-end traceability. Frauds at feed level can also invalidate authenticity claims for downstream products (e.g., organic, non-GMO, origin labelling). **Excluding feed creates a critical control gap in food fraud mitigation.** **Excluding feed would leave a significant upstream vulnerability unaddressed, undermining the effectiveness of the overall food fraud framework.** Please see below some publicly reported cases: - One of the most significant incidents occurred in Belgium in 1999, known as the **Dioxin Affair**. This crisis involved the contamination of animal feed with polychlorinated biphenyls (PCBs), which are dioxin-like compounds. The contamination was traced back to an oil-and-fat-recycling company that had included transformer oil in the feed, leading to widespread contamination of eggs, chickens, and other animal products. The company involved used falsified documents and improper labeling to disguise the presence of these harmful substances. Please find more information here:	

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<tr><th></th><th>Response</th><th>Chair/Co-Chair Comments</th></tr>
<tr><td></td><td>

- Organic fraud in the feed sector in the USA, impacting both consumer trust and food safety. In 2019, a major case involved a farmer from Missouri who was sentenced to 10 years in prison for masterminding the largest known organic food fraud scheme in U.S. history. He sold non-organic grains as organic, defrauding customers of millions of dollars. Fraudulent Organic Grain Imports: Investigations have revealed that fraudulent organic grains, particularly corn and soybeans, have been imported from countries like Turkey and Ukraine. These grains were sold as organic but did not meet the required standards. Please see more information here.

- Other examples identified by GMP+, some of which with indirect incidence on food safety:

<table>
<tr><td>Substitution</td><td></td></tr>
<tr><td>Sunflower oil diluted with mineral oil in Ukraine</td><td>Sunflower article</td></tr>
<tr><td>Crude sunflower diluted with refined poultry oil in Ukraine (EWS GMP+)</td><td>Sunflower poultry oil EWS 2015.11.17</td></tr>
<tr><td>Animal fat diluted with technical fat in Belgium</td><td>article
article</td></tr>
<tr><td>Substitution of fish meal with feather meal</td><td>MANCP Multi-year Annual Control Plan Netherlands, annual report 2013</td></tr>
<tr><td>Concealment</td><td></td></tr>
<tr><td>Absence of L-lysine in feed additives</td><td>RASFF 2011.1184</td></tr>
<tr><td>Absence of choline chloride</td><td>RASFF 2011.0727</td></tr>
<tr><td>Selling first production start-up product with a low quality as normal product</td><td></td></tr>
<tr><td>Mislabeling</td><td></td></tr>
<tr><td>False declaration of geographic, species, botanical or varietal origin: e.g. origin unclear of fish meal declared as from Latvia</td><td>RASFF 2015.0489</td></tr>
<tr><td>Technical casein labelled as feed-grade casein</td><td>RASFF 2007.CRV</td></tr>
<tr><td>Unauthorized use of specific quality certificate / logo (e.g. GMP+ logo) but not produced according to these quality standard</td><td>Newsletter 2015-01-29</td></tr>
<tr><td>Improper health certificate fish meal</td><td>RASFF 2012.BEH</td></tr>
<tr><td>Unapproved addition</td><td></td></tr>
<tr><td>Melamine added to soybean meal</td><td>RASFF 2008.1480</td></tr>
<tr><td>Addition of urea to yeasts</td><td>RASFF 2016.0160</td></tr>
</table>

Comment on Option 2:

Feed is critical to food safety and food fraud but not embedded in the “food chain” definition. Codex does not explicitly define “food chain” as including feed. Adding a footnote linked to “food chain” would constrain later interpretation. Within the General Principles of Food Hygiene (CXC 1-1969), the food chain is described in terms of: production, processing, distribution and consumption of food.

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<tr><td>New Zealand</td><td>New Zealand supports Option 3: Remove the reference in the text all together.

Rationale: While animal feed may have been referenced in some other Codex text this has been with a limitation to where it impacts food safety to bring it into the mandate of Codex. The impact on food safety aspect is therefore covered in the current draft and does not require further reference.</td><td></td></tr>
<tr><td>Spain</td><td>Spain believes that Option 1 is the most appropriate one. Either as it is now on the text or by replacing ‘as appropriate’ by ‘if applicable’.</td><td></td></tr>
</table>

	Response	Chair/Co-Chair Comments
	Rationale: Spain considers that feed for food-producing animals should be included within the scope of the guidelines. Although food fraud frameworks often focus on products intended for direct human consumption, fraud affecting feed may have a significant impact on food of animal origin, such as meat, milk or eggs. Feed is an essential input in livestock production and risks or fraudulent practices introduced at this stage may affect food safety, product quality, traceability, authenticity claims and consumer trust. Feed supply chains may be vulnerable to practices such as substitution of declared ingredients with lower-value materials, dilution with non-compliant or contaminated substances, or misrepresentation of origin or composition. These practices may have consequences not only for animal health, but also for food safety, for example through the carry-over of contaminants or unauthorised substances into products of animal origin. Spain therefore considers that excluding feed would create an upstream control gap and would weaken the effectiveness of the overall food fraud framework. In this regard, Spain recalls that the European Union's official control framework, in particular Regulation (EU) 2017/625, covers both food and feed law, reflecting an integrated approach to controls across the food chain.	
Germany	For **Option 1**, agree with this suggestion.	
Argentina	Argentina supports **Option 1**. We believe that the reference to "feed for food-producing animals" should be kept in the text. From a veterinary and food safety perspective, the integrity of the food chain is a continuum. Fraud in animal feed can directly impact the safety of the final food product and the health of consumers. Therefore, its inclusion is essential for a comprehensive approach.	
France	The French authorities thank the Chair and Co-Chairs of the eWG for the work on the draft guideline on Food Fraud prevention, and the opportunity to answer regarding the reference of "feed" in this guidance. The French authorities, as previously mentioned during the first round of consultation, consider **that feed for producing animals should be included in these guidelines, and are in favor of the 1st option**. Indeed, ensuring the consumers safety is a major objective of the Codex Alimentarius, and feed frauds may have an impact on the products of animal origin (meat, milk) and therefore cause threats for consumers, from a food safety point of view.	

	Response	Chair/Co-Chair Comments
	Thus, to ensure the global safety of the food chain and tackle the growing concerns regarding food fraud, from farm to fork, addressing fraud in feed is necessary. Regarding the 2nd option, generally speaking, the French authorities **support the addition of this footnote**, as a fact, regardless of the reference of "feed" in the scope of the guideline. ⇨ The French authorities support the addition of this footnote, whether feed is mentioned or not. ⇨ The French authorities do not support the 3rd option.	
United States	The United States' preference is for **Option 3.** The United States does not believe the bracketed text is necessary to include and proposes to remove it because it does not appear to add further clarification to the text. However, if the consensus from the members is to include some type of reference to animal feed within this document, in the spirit of compromise, the United States can agree to Option 1, ***as long as*** the phrase "as appropriate" continues to be included. The phrase provides the necessary flexibility for competent authorities.	
Thailand	As this document provides guidance on the prevention and control of food fraud and focuses on food, the inclusion of feed for food-producing animals should be limited to cases where it has an impact on food safety or claims on food. We therefore propose revising the text as follows: "[including, as appropriate, feed for food producing animals ***where it impacts food safety or claims on food***]"	New: The purpose is to provide guidance to competent authorities and FBOs on the prevention, detection, and mitigation, and control of food fraud to help protect the health of consumers, and to ensure fair practices in food trade, [including, as appropriate, feed for food producing animals [**where it impacts food safety or claims on food**.]
Canada	Canada's preferred option is ***Option #3*** *"Remove the reference in the text all together"*. Canada considers that an explicit reference to feed is not technically necessary, as the root causes of food fraud - whether related to feed or other food inputs - are already de facto addressed and implied throughout the guidance. In particular, the types of food fraud under section 4 of the document include "*Misrepresentation: Labelling or marketing a food product in a manner that is false, misleading, or deceptive*." This category would encompass fraudulent claims on food products resulting from feed-related fraud (for example an organic claim on meat derived from an animal fed non-organic feed). In addition, food	

	Response	Chair/Co-Chair Comments
	safety aspects associated with feed are addressed in CAC/RCP 54-2004 (CODE OF PRACTICE ON GOOD ANIMAL FEEDING). With respect to Option #2, "*Add a footnote to the first use of FBO that references the definition of FBO from CXC 1-1969*," it is unclear whether the bracketed text would be retained or removed upon insertion of the proposed footnote. Should the bracketed text be deleted, and should this option sufficiently address the EWG members' concern regarding the implied inclusion of feed within the scope of the guidance, Canada would also support Option #2.	
United Kingdom	**Option 1** The UK supports Option 1, retaining the reference to feed for food-producing animals within the scope of the draft food fraud guidance. The UK notes that other members have already provided examples of fraud in the animal feed sector that have materialized as risks to food safety and/or authenticity; accordingly, UK comments focus on the rationale for supporting the inclusion of feed within scope. This approach, including the qualifier "as appropriate", reflects the integral role of feed as an upstream component of the food chain, while maintaining flexibility for proportionate, risk-based regulatory oversight through joined-up working where responsibilities for feed and food sit with different departments or agencies. The UK also notes the intention for the food fraud guidance to be applied horizontally, rather than to replace or duplicate existing Codex texts. This is explicitly confirmed in the draft purpose and scope, which states that *the guidance is intended to support or supplement existing Codex texts by providing additional guidance specific to food fraud that can be considered within national food control systems* (NFCS). In this context, the UK further notes that the **Code of Practice on Good Animal Feeding (CXC 54-2004)** focuses on feed safety and, while it helpfully incorporates traceability, is silent on food fraud. The UK therefore views the inclusion of feed within the scope of the food fraud guidance as an opportunity to close this upstream gap, without the need to reopen or amend existing Codex texts. It is also relevant to consider the wider impacts of food fraud originating upstream in the feed sector, including how such incidents can affect consumer confidence and trust in foods of animal origin, undermine confidence in the food industry's own controls and assurance systems, and negatively affect trade where confidence in the effectiveness of a country's NFCS to prevent, detect and mitigate food fraud is weakened. **Option 2** The UK considers Option 2 to be sub-optimal, as reliance on a footnoted definition of *food business operator (FBO)* from CXC 1-1969 introduces ambiguity, particularly as it is unclear whether "any step in the food chain" would consistently be interpreted as capturing upstream inputs such as animal feed.	

	Response	Chair/Co-Chair Comments
	The UK could, however, support this option if the footnote were expanded to clarify that, for the purposes of this guidance only, this includes feed for food-producing animals. The UK notes that there is precedent within CCFICS for this approach, where explicit clarification has been provided to ensure feed is captured where relevant, rather than relying solely on general Codex definitions (e.g. **CXG 89-2016**). A suitably revised footnote is shown below: • ***For the purposes of this guidance only*, food business operator (FBO), as defined in the *General Principles of Food Hygiene (CXC 1-1969)*, includes feed for food-producing animals.** **Option 3** The UK does not support Option 3. Removing the reference to feed from the scope of the guidance would create an upstream gap in the scope of the guidance by excluding an important stage of the food chain where fraudulent practices may originate and where risks to food safety, integrity and authenticity can be introduced or amplified. This would reduce clarity for competent authorities and undermine joined-up working, particularly where responsibilities for feed and food are divided across different departments or agencies, as prevention strategies that do not consider vulnerabilities along the entire chain are inherently less effective. This would run counter to the stable-to-table, risk-based approach embedded within national food control systems.	
Brazil	Brazil would like to thank the chair and co-chairs of Food Fraud EWG for Consultation 2 Brazil considers that is more suitable **option 3**: Remove the reference in the text all together **Rational** The removal of the reference is supported by the mandate and the comprehensive scope of the Codex Alimentarius, as well as the principles established in its Procedural Manual. The Codex has the statutory objective (Mandate) of protecting consumer health and ensuring fair practices in food trade, covering the entire food chain, "from production to consumption." In this context, aspects related to animal feed are already addressed, when relevant and pertinent to human health issues. And, therefore, also in relation to food fraud, respecting the scope of the Codex. It is important to highlight that there are already Codex texts that specifically address animal feeding in this regard, such as the Code of Practice on Good Animal Feeding (CXC 54-2004), which already establishes the adoption of good practices for animal feeding, aiming at the safety of food for human consumption. It also addresses ingredients	

	Response	Chair/Co-Chair Comments
	for animal feed and labeling, therefore covering general aspects that may influence issues affecting products intended for human consumption. It can be understood that issues of animal feeding in relation to aspects of fraud, as defined within the scope of Codex, are included in the mandate, without the need to explicitly mention them in the text or in a footnote. Additionally, the Codex Procedures Manual establishes that new texts must have a clear scope and avoid unnecessary duplication with existing standards. Thus, the explicit mention of animal feed in the present text does not appear necessary, since any potential impacts of animal feed on food integrity, including regarding potential fraud, are already implicitly covered in the current Codex regulatory framework. The inclusion of this reference could generate redundancies or restrictive interpretations of the scope of the document, contrary to the principles of clarity, coherence, and efficiency that guide the development of standards within the Codex. The removal of the reference, therefore, contributes to coherence with the Codex mandate, prevents regulatory overlap, and keeps the text focused on its main objective, without compromising the proper consideration of relevant risks throughout the food chain.	
Norway	Should this guideline on the prevention and control of food fraud include or make reference to "feed for food producing animals"? **Norway response to General Question:** Yes, we agree that this guideline should include "feed for food producing animals" in its scope. It is highly relevant for the issue at hand. Feed for food producing animals is covered by the codex mandate and already included in several texts under CCFICS. We support the text in square brackets and suggest deleting the brackets. Please feel free to choose one of the three options below and provide a rationale for your answer. If your preference is not represented by one of the three options, then please provide an alternative path forward along with a rationale for your answer. Proposals from the EWG Chair and Co-Chairs for consideration by the EWG: 1. **Keep 'as appropriate' (or use 'when applicable') in the text.** (Keep 'As is' or minor modification to current text.) **Norway response to Option 1:** Norway supports this option, retaining feed for food-producing animals within the scope of the draft guidance. Feed is an integral upstream component of the food chain and highly relevant in cases of food fraud, as illustrated by examples provided by other members. 2. **Add a footnote to the first use of FBO that references the definition of FBO from CXC 1-1969**.	

	Response	Chair/Co-Chair Comments
	The footnote would read: "FBO as defined in the 'General Principles of Food Hygiene (CXC 1-1969)': Food business operator (FBO): "The entity responsible for operating a business at any step in the food chain." **<u>Norway response to Option 2:</u>** Norway considers that this proposal would require further clarification, reflection and additional discussion. 3. **Remove the reference in the text all together**. **<u>Norway response to Option 3:</u>** Norway does not support this option.	
Indonesia	Indonesia supports **Option 2** namely **add a footnote to the first use of FBO that references the definition of FBO from CXC 1-1969**. Indonesia considers that feed is already addressed in separate Codex texts, and that an explicit reference in this guideline may create unnecessary overlap with existing provisions. In addition, feed-related activities may already be covered under the broad definition of FBO as an entity operating at any step in the food chain. Therefore, the footnote approach would provide sufficient clarity while maintaining the focus on coherence of the guideline.	
Australia	Australia can support ***Option 1****: keep 'as appropriate' in the text. (Keep 'As is')* Australia is of the view that it would be acceptable for the guidance to incorporate feed as presented in Option 1. It provides sufficient recognition of the relevance and importance of feed in national food control systems and the risk that fraud in feed may pose to the health of consumers. This high-level reference to feed is consistent with the approach taken to date in CCFICS guidance and does not require further expanding upon throughout the guidance. The food fraud text is intended to provide high level guidance on preventing and minimizing food fraud risk using existing controls and mitigation measures available to countries through their National Food Control Systems (NFCS) or by adopting new measures, if necessary. If additional measures are required within a national food control system to address fraud in feed, appropriate guidance on animal feed controls exists in CXC 54-2004 *Code of Practice on Good Animal Feeding*, CXG 80-2013 *Guidelines on the Application of Risk Assessment for Feed*, and CXG 81-2013 *Guidance for Governments on Prioritizing Hazards in Feed*. These texts recognize that there are special aspects to animal feeding and provide detailed guidance for members to ensure animal feed systems and oversight support food safety for consumers.	

	Response	Chair/Co-Chair Comments
Codex Observer Organizations		
	SUMMARY Three Codex Observer Organizations submitted a response to this round. Each had a different option preference. Observer organizations did not deem necessary to focus on one step of the food chain in the text, did not believe the text itself even with the reference to animal feed would help with the prevention of fraud in the feed industry, and noted adding animal feed could duplicate the considerations of existing animal feed standards.	
ICBA (International Council of Beverages)	ICBA supports **Option 2** as it appropriately captures the full scope of the food chain without focusing specifically on any one aspect or step.	
THIE (Tea & Herbal Infusions Europe)	THIE favours **Option 3**, i.e. to remove the reference to feed from the *Guideline on the prevention and control of food fraud* based on the fact that this guidance should not attempt to incorporate feed systems into the text and duplicate the considerations of existing animal feed standards.	
IFIF (International Feed Industry Federation)	**Option 1.** The International Feed Industry Federation (IFIF) supports this approach, although we consider that the risk of food fraud as stated in the document would cover food prepared and consumed by a human consumer and would not help the prevention of fraud in the feed industry.	