Conclusions of the FLEP workshop „What can we learn from the Belgium dioxin case“?

Working Party “Dioxin”

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Status and work of laboratories

1. On April 26, the first results demonstrated high dioxin contamination. These results were performed in an institute which was formerly completely governmental and is now half privatized. The analyses were done for a private customer, thus giving the laboratory not the possibility to inform the government officially. As in general for private laboratories, the results from samples from private customers can be used or passed forward to the competent authorities only with permission of the customer. This caused later severe problems in public discussions, because an obvious governmental laboratory could not inform the government officially. Thus, we observe that mixed structures of laboratories with governmental and private activities can cause severe problems for the government if the laboratory finds alarming results from private activities but is not allowed to inform their government. As a result, these structures have to be considered.
2. Private industry and private laboratories should be obliged to inform the government if they learn about severe problems for public health, because e.g. contaminants in high amounts enter the food chain as feedstuff or food. Then, official samples must be taken immediately.
3. Official samples can be analyzed either in official or private labs; however the government bears the responsibility for publication of the results. Thus, only accredited and specified laboratories should be used. It seems recommendable to have qualified official labs available. The official authorities should have an idea on the quality of the labs. Besides accreditation, staff and equipment, some minimum validation data on the analytical performance must be available. In the case of residue analysis (including dioxin analyses), the limit of determination should be in the range of one fifth of the tolerance. Spiking experiments should prove the suitability of the applied methods on the following levels: ½ tolerance, 1x tolerance, 2x tolerance. The coefficient of variation should be determined and be in accordance to recommended ranges for different levels of pesticides or contaminants.

Amendment of feed control

1. Feed products must be controlled more intensely for contaminants. A monitoring system should be introduced or intensified to detect general changes on different stages (raw material, end products). The feedstuff control should make sure that sufficient frequencies of inspection and sampling is guaranteed. Monitoring and enforcement should be harmonized on a higher level.
2. These controls must include dioxins, as dioxins are taken up to 95 % via food, from this to 90 % via food of animal origin. Generally, the content of persistent contaminants in food of animal origin is the result of the contamination of the feedstuff.
3. In 1998, WHO proposed an ADI of 1 to 4 pg WHO-TEQ/kg bw/day for dioxins and dioxinlike PCBs. This ADI should be adopted for calculations of tolerances to make sure that harmonized tolerances are on the basis of the same toxicological evaluation.
4. The HACCP concept should be brought into the feeding industry.

5. The list of forbidden products included in Commission decision 91/516 should be permanently updated according to scientific progress.
6. The right for intervention already in the case of suspicion and information duties related to the Commission and other member states should be adopted as it is established for food control. A rapid alarm system should be included.
7. Harmonized limits for all feeding stuffs for dioxins, PCBs and other contaminants as PAH's and mycotoxins must be laid down. The principle of singular regulations should be replaced by general regulations for all feeding stuff.
8. To be checked by the feedstuff authorities: Is there a need for improvement of labelling of components (complete qualitative and quantitative labelling or sufficient to trace it back on request?)

Crisis procedures

1. Experts from all kinds of professions are needed to recognize the variety of possible problems. As soon as a serious problem is recognized, a coordinating committee should be determined.
2. Standard procedures for emergency crisis should be laid down describing the actions to be taken and listing possible experts and persons available and to be involved. These procedures should be available on governmental level as well as on feedstuff industry level.
3. Crisis management should set priorities according to the percentage of suspicious components in processed food.
4. Feedstuff industry should have a recall procedure.

Tracing and tracking, certification

1. Tracing and tracking should be improved to get the origin of the food. It would be helpful to be able to trace back a product to the producer.
2. The certification system for every single product (certificate to be free of contamination) seems to be a too demanding issue and should be reconsidered in preparation of future crisis.