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## CODE OF CONDUCT

On an

### EARLY WARNING SYSTEM (EWS)

**For undesirable substances in Feedstuffs and Animal Feed/Pet Food in South Africa**

**For members of:**

**Animal Feed Manufactures Association (AFMA) and  
Pet Food Industry (PFI)**

This protocol is based on the EWS protocol of the Dutch GMP+ Certification Scheme for the Feed Sector 2006 2 of 10 Appendix 5: (Minimum requirements for EWS (version 1 November 2007/corr. 27 October 2008) © PDV)

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**Animal Feed Manufacturers Association Reg. No. 1988/005169/08**

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## TABLE OF CONTENT

1.	INTRODUCTION.....	2
2.	WHY AN EARLY WARNING SYSTEM (EWS)? .....	2
3.	WHO SHOULD REPORT? .....	2
4.	WHAT IS TO BE REPORTED UNDER EWS?.....	3
Note:	(See the attached Appendix 1 - Document G-I001-02-20-02 - Guidelines list of Hazardous Materials).....	3
5.	WHEN TO REPORT? .....	3
6.	CENTRAL EWS REPORTING CENTRE FOR THE ANIMAL FEED SECTOR.....	5
7.	METHOD OF REPORTING .....	5
8.	WHAT WILL BE DONE WITH THE REPORT? .....	6
	APPENDIX 2: OBSERVATION REPORT FORM.....	8

## 1. INTRODUCTION

The purpose of the Early Warning System (EWS) for animal feed and pet food is to provide the industry with an effective tool for the exchange of information on measures taken to ensure food safety. It is imperative that the animal feed and pet food industries act responsibly towards the well-being of the industry as well as the consumer (human and animal), as far as hazardous materials are concerned. Materials such as melamine and heavy metals are examples of hazardous materials that entered the international and South African markets with potential devastating consequences to the food chain. Although individual companies have their own GMP and ISO procedures in place, this EWS aims at compulsory reporting of such hazards to protect the whole industry and the role-players and consumers in the food chain.

If there is a potential hazard which cannot be controlled by the participant and which may also cause damage to others, then the participant is obliged to inform AFMA who will appoint an independent body to investigate the potential hazard.

**The aim is to assure Consumers that contaminated or suspicious products, subject to an alert notification, have been withdrawn or are in the process of being withdrawn from the market and that measures are in place to prevent them re-entering the food chain.**

A further aim will be to have this Code incorporated into the GMP - Good Manufacturing Practice for the Animal Feed Industry, by the South African Bureau of Standards (SABS).

## 2. WHY AN EARLY WARNING SYSTEM (EWS)?

The objective of an early warning and response system is the early detection and reporting of irregularities in raw materials and ingredients for use in animal feeds and pet foods and to enable a rapid response and efficient communication throughout the animal production chain, with the aim of preventing or limiting the harmful consequences for man, animals and the environment.

***EWS is required to prevent the possible harmful effects of potential irregularities. This means preventing or limiting crises and incidents.***

## 3. WHO SHOULD REPORT?

All members of AFMA and the PFI are obliged to report. A number of organisations that are not AFMA or PFI members, may report within the framework of the EWS, namely animal science practitioners, veterinarians, feed companies, pet food manufacturers, laboratories, provincial and/or national departments of agriculture and health, sector organisations, procurement agencies, feed ingredient / raw material suppliers, commercial livestock producers, Inspection agencies, dairy-, meat- and egg processors, foodstuffs industry, agricultural consultants, as well as other role-players in the Animal and Pet industries.

#### 4. WHAT IS TO BE REPORTED UNDER EWS?

Irregularities that may occur in the product or in the production process, as well as inexplicable events or suspicions which might have consequences on feed safety must be reported. Irregularities that can be fixed or controlled by the party involved should also be reported. A list of substances is given in **(Appendix 1)** but reports under the EWS should not be limited only to this list. Constant additions will be made on new hazards as the industry becomes aware of local and/or international alerts through different local and/or international alert channels.

This also involves a learning opportunity for others.

**Note: (See the attached Appendix 1 - Document G-I001-02-20-02 - Guidelines list of Hazardous Materials).**

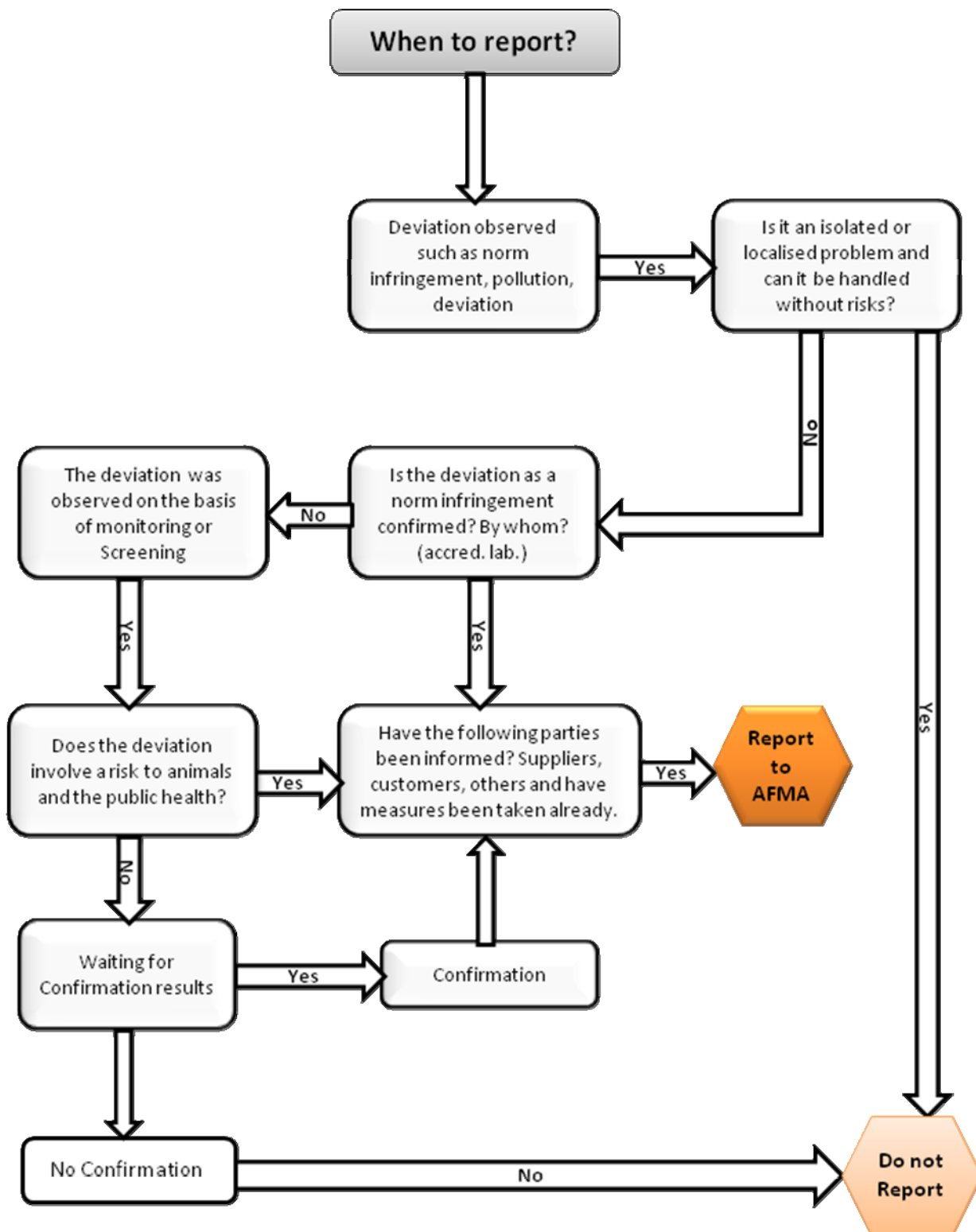
##### Examples

- Matters directly observable in the product, macro- or microscopically (odour, colour and other organoleptic anomalies, for example a strong odour of petrol);
- Analytical results falling outside standards or specifications (exceeding agreed action limits, standards or tolerances, or extremely high values in the absence of standards);
- Abnormal illness/death of animals;
- Rejected consignments of goods;
- Unusual or inexplicable occurrences.

#### 5. WHEN TO REPORT?

The reporting party decides whether or not the observation needs to be reported to the EWS Reporting Point. Where an anomaly cannot be rectified internally by means of control measures, or where the consequences threaten to pass beyond the bounds of the business, the anomaly must be reported directly to the EWS Reporting Point (see the following decision tree).

When it is decided to compile a report then the reporter must provide as much information as possible about the matter to the EWS Reporting Point.



## 6. CENTRAL EWS REPORTING CENTRE FOR THE ANIMAL FEED SECTOR

Reporting point will be as follows:

### 1. AFMA

Contact person : Executive Director (Mr De Wet Boshoff)  
Physical Address : Embankment Park, 194 Kwikkie Crescent, Centurion  
Postal Address : P.O. Box 8144, Centurion, 0046  
Telephone : +27 (0)12 663 9097  
Fax Number : +27 (0)12 663 9612  
E-mail : [admin@afma.co.za](mailto:admin@afma.co.za)

### 2. PFI

Through their Executive Director to AFMA

**Investigating agency:** AFMA will appoint an independent investigating agency that have the necessary capacity and skills to speedily perform a successful investigation, The Agency will only report back to the executive director of AFMA.

## 7. METHOD OF REPORTING

Before submitting a report it is important to assemble all details in relation to the irregularity detected.

### Reporting on the basis of analysis results

When a report is compiled to AFMA on the basis of laboratory result for example a norm infringement then account should be taken of:

- Measuring inaccuracies;
- The analysis methods to be used for confirmation these can only be accredited methods;
- Repeatability / reproducibility. For example in the event of fluorine determinations in molasses repeatability is moderate.

The reporter should make use of the Observation Reporting Form (Appendix 2) in order to be aware of which information to collect so as to compile as comprehensive a report as possible.

## 8. WHAT WILL BE DONE WITH THE REPORT?

AFMA and the Investigating Agency are obliged to handle the data in confidence.

- a. All reports will be treated in confidence, also with respect to the anonymity of individuals that report. No business-specific information will be provided to third parties without the permission of the reporting body.
- b. Despite the requirements of point 1, the requirement to report to the official body remains in force, where there is the possibility of a legal infringement.
- c. AFMA will allocate an anonymous serial number to the report so that the report may be discussed anonymously (where possible).
- d. The information provided will be available only to the AFMA and the investigating agency.
- e. The reporting party will be informed of the outcome of the assessment.
- f. AFMA will only issue information to third parties in the form of an EWS report after prior notification to the relevant the reporter and any other third parties involved. AFMA, however have the sole right to publish such an EWS report and the reporter and/or any third party have no authority to prevent such publication.
- g. An EWS report will only be published when sufficient reliable information is available.
- h. The EWS report will be published to all members of AFMA; PFI and Act 36 of 1947 as an ALERT that states:
  - What has been observed (context of the problem)?
  - Product/ ingredient / raw material involved;
  - Batch numbers;
  - Quantity/size of the batch involved;
  - Origin of the goods (country and/or supplier);
  - In the case of sea transport: Is the name of the vessel known? If so, which?
  - Is the batch part of a larger unit and if so is it known how big this is and where the other products are?
  - Other information necessary.

- i. The EWS registers are accessible only to AFMA and the PFI. Third parties will only have access with the permission of the Executive Director of AFMA.

This protocol has been drawn up in order to assure you that the information reported will not be used against the reporting body. This may include “competition” (economic disadvantage), fines, etc.

**GUIDELINE LIST OF HAZARDOUS MATERIALS FOR EWS REPORTING**

<b>APPENDIX 2: OBSERVATION REPORT FORM</b>		<i>No.:</i>
<b>Date and time of the observation:</b>	.....	
<b>Reported by:</b>	..... ..... ..... (contact person, organisation)	<i>Code:</i> (anonymous)
<b>Telephone number:</b>	.....	
<b>E-mail address:</b>	.....	
<b>Nature of report:</b>	..... ..... ..... <ul style="list-style-type: none"> <li>• What does the observation refer to?</li> <li>• What has been observed, and what is the context of the problem?</li> <li>• What is the (probable) cause date?</li> <li>• What products or raw materials are involved?</li> <li>• What anomalies, contaminants or hazards have been observed?</li> <li>• Has there been an analysis (screening or confirmation)</li> <li>• By whom? (accredited lab.)</li> <li>• How was the sample taken?</li> <li>• Which analysis method was used? (bundle method)</li> <li>• What is the possible cause? Is this confirmed or only suspected?</li> <li>• What other information is available?</li> </ul>	
<b>Origin of the goods: / Explanation relating to supplier of the goods:</b>	..... ..... <ul style="list-style-type: none"> <li>• What is the origin of the goods?</li> <li>• In the case of sea transport: Is the name of the vessel known? If so, which?</li> <li>• Quantity/size of the batch involved?</li> <li>• Is the batch part of a larger unit and if so is it known how big this is and where the other products are?</li> <li>• Where is the reported batch at this time?</li> </ul>	
<b>Products or raw materials already been delivered or blocked</b>	..... ..... (Information required to implement isolation of the relevant links in the supply chain)	
<b>What measures have already been taken?</b>	Measure 1:..... ..... Measure 2:..... ..... .....	