



Verband Deutscher Landwirtschaftlicher Untersuchungs- und Forschungsanstalten

Fachgruppe VI Futtermitteluntersuchung

European Commission
EURL, Feed Additives
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only by mail

Working group "Enzymes"

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Opinion on the current situation of harmonization of the methods in the authorization process of enzymes in feed

Dear Sir or Madam,

the consideration and implementation of published harmonized analytical methods is a major concern worldwide. This concern is claimed specifically from the official control laboratories for the process of the authorization of feed additives as well. Due to the variety of authorization methods it is impossible to guarantee an effective surveillance.

In collaboration with the leading enzyme producers and official control laboratories the determination of the phytase activity in feed has been harmonized within the framework of the second mandate (M 382) within CEN/TC 327/WG 3. This was a very labor-intensive process with financial support of the EC over a couple of years which finally ended in the publication of the method as ISO EN 30024 "Determination of phytase in animal feed" in 2009. This standard has the highest legal priority for official control and worldwide respectively. Until now no case is known in which the EN ISO 30024 could not measure the phytase activity.

Currently, a number of new registrations of phytases use methods that do not comply with the EN ISO 30024 standard.

An example of this problem is the enzyme product "Optiphos": Although both the 'Optiphos method' and the EN ISO 30024 standard use the same substrate, the same incubation temperature and the same pH for the enzyme reaction, but the measured activities are not the same. This is caused in the different reaction and measurement conditions.



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Different defined enzyme activities lead to confusion and deception for the end users (farmers) but are also a challenge for the official laboratories because the EN ISO 30024 cannot be used. In times of scarce financial resources allocated to official control authorities, it is not possible to establish different methods for the same parameter. Additionally in some cases the necessary product information of samples for official control are not available for the laboratories in order to deviate from the European standards of highest priority.

In order to give the official laboratories the possibility to apply the EN ISO 30024, the EURL is planning a ring test to derive an appropriate conversion factor from EN ISO 30024 to the 'Optiphos authorization method'.

From the point of view of the working group "enzymes" of Section VI of the VDLUFA this approach sends the wrong message to producers and to future applicants. For official control but also for the authorization of feed additives the method cascade of the Regulation (EC) No 882/2004 Article 11 is mandatory. Otherwise the situation will create distortions of competition for those, which has followed the convention (application of the European standards) in the authorization procedure.

The activity of phytases cannot be predicted in animals (in vivo) with any currently available methods. Accordingly, it should be possible to use the EN ISO 30024 which is worldwide valid or binding in Europe, in the same way for the quantification of all phytases and for the determination of the enzyme units.

The EURL for feed additives should not support the establishment of conversion factors between the authorization methods and the valid standards (ISO), but - from the point of view of the working group "enzymes" - it is necessary that the EURL demands the application and compliance of published harmonized standards in the authorization process of feed additives.

Yours faithfully,

DI Irmengard Strnad
(Chairperson)