SUPPLEMENTARY INTERPRETATION GUIDELINE FOR APPLICANTS AND AUDITORS

Amendment to BAP Feed Mill Standard Issue 2.1 (23 May 2017)

Applicable to shrimp hydrolysates only

The BAP Feed Mill Standard (Issue 2.1, 23 May 2017) includes various requirements that are stated as either HACCP Process Controls, or as Good Manufacturing Practices. One of these relates to practices aimed at preventing transmission of diseases to farmed animals via feeds. The requirement is stated in the BAP Feed Mill Standard as follows:

“The refeeding of a given species back to the same or closely related species in the form of processed and/or non-processed aquaculture feeds shall be avoided to block this possible route for the spread of disease.

Feed Mill Standard clause 6.14: The applicant shall respect prohibitions of the refeeding of ingredients from like aquaculture organisms to prevent transmission of disease.”

There are related clauses in two other BAP standards, the Finfish and Crustacean Farm Standard (FCFS), and the Finfish, Crustacean and Mollusk Hatcheries and Nurseries Standard (HS):

**FCFS 15.8:** For feed suppliers that are not BAP-certified, statements are required attesting to the application of production procedures that exclude proactively prohibited drugs, **by-products from same species**, unsafe levels of heavy metals and physical or other contaminants.

**HS 7.6:** No feeds that contain **material derived from the flesh or carcasses of the same species** that is reared in the facility shall be used, even if such materials have supposedly been disinfected by cooking or other treatment.

BAP has adopted a change to this general policy, specifically concerning by-products from shrimp, and the following amendment is hereby made to the BAP Feed Mill Standard Issue 2.1, and by extension the amendment is to be applied also to the 2 clauses cited above from the FCFS (15.8) and the HS (7.6).
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As an exception to the prohibition (of clause 6.14) on refeeding of ingredients from like aquaculture organisms, hydrolyzed shrimp head products subjected to heat*, chemical and enzymatic treatments shall be permitted as long as the process** can be clearly shown*** to meet criteria for regulatory control and include safeguards such that there is functionally no risk of transmission of bacteria, viruses, specific shrimp pathogens**** or biologically infectious agents.

* the necessary heat treatment shall be defined in terms of time and temperature

** the production process shall be managed according to a written HACCP Plan that includes enzymatic hydrolysis and heat treatment as Critical Control Points.

*** an independent annual audit of the production unit, the production process, the HACCP Plan and its effective implementation and outcomes (as verified by pathogen tests) shall be conducted annually by a food or feed safety auditor with qualifications and training meeting the GAA norms defined in Sections 3.63 and 3.64 of the CB Requirements Document:


**** the shrimp pathogens listed by OIE

http://www.oie.int/index.php?id=171&L=0&htmfile=titre_1.9.htm

The burden of proof of compliance with the requirements stated in this Amendment rests with individual ingredient manufacturers, who must provide feed mills and BAP with documentation that clearly demonstrates that they have applied all the treatment processes specified above as being necessary to ensure consistent control of potential disease risks.

Please contact BAP with any questions related to this policy.