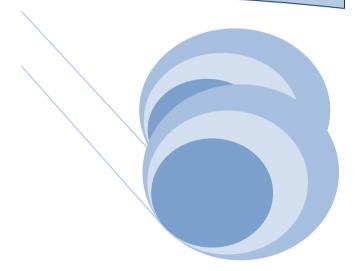
#### CN28: Conditions and Guidelines for Registered Transporters of Animal By-Products and Derived Products

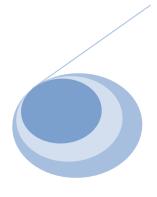


# CONDITIONS AND GUIDELINES FOR REGISTERED TRANSPORTERS OF ANIMAL BY-PRODUCTS AND DERIVED PRODUCTS



#### GOVERNING EU AND NATIONAL LEGISLATION:

The European Union (Animal By-Products) Regulation 2014 (S.I. No. 187 of 2014) and in accordance with Regulation (EC) No. 1069 of 2009 and Regulation (EU) No. 142 of 2011.



Issued 10<sup>th</sup> May 2016 Milk & Meat Hygiene/ABP/TSE Division

#### CN28: Conditions and Guidelines for Registered Transporters of Animal By-Products and Derived Products

#### CONDITIONS AND GUIDELINES FOR REGISTERED TRANSPORTERS OF ANIMAL BY-PRODUCTS AND DERIVED PRODUCTS

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#### **GLOSSARY OF TERMS**

#### A

'Animal By-Products' (ABP) means entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen.

#### D

- 'DAFM' means the Department of Agriculture, Food and the Marine;
- **'Derived products**' means products obtained from one or more treatments, transformations or steps of processing of animal by-products;

#### Ε

**'Establishment**' or '**plant**' means any place where any operation involving the handling of animal by-products or derived products is carried out, other than a fishing vessel;

'EU' means the European Union.

#### E

'MBM' means meat and bone meal.

#### 0

'Operator' means the natural or legal persons having an animal by-product or derived product under their actual control, including carriers, traders and users.

#### <u>P</u>

'PAP' means processed animal protein.

#### **SECTION 1**

#### GENERAL INFORMATION AND REQUIREMENTS

#### 1.1 GENERAL INFORMATION AND REQUIREMENTS

- An operator involved in the collection and transport of animal by-products (ABP) and derived products, must be registered by the Department of Agriculture, Food and the Marine (DAFM) and the registration must be in date in accordance with Article 23 of Regulation (EC) No. 1069/2009 and Regulation 11 of SI 187/2014.
- The operator must comply with all relevant requirements set out in Regulation (EC) No. 1069/2009 and Commission Regulation (EU) No.142/2011 and all other relevant EU and National Legislation, in particular S.I No. 187 of 2014.
- The operator must notify DAFM immediately if they cease to transport ABP or derived products. The receptacles must be decommissioned at this time and prior to use for any other activity. The decommissioning procedure can be found in Section 3.1.2. (b) on page 3 of this document.
- The operator must put in place, implement and maintain a system of own checks to monitor compliance with the legislation.

#### 1.2 BACKGROUND

EU Legislation (Regulation (EC) No. 1069/2009 and Commission Regulation (EU) No. 142/2011) lay down the hygiene requirements for the collection, transport and identification of ABP and derived products. In particular point (3) of, Chapter I, Annex VIII of Regulation (EU) No. 142/2011 provides that reusable containers must be dedicated to the carriage of a given category of ABP and derived product to prevent cross-contamination. This is important in the context of TSE controls and, in particular, the need to ensure that ABP and derived products do not enter the food or feed chain.

An operator involved in the collection and transport of animal by-products (ABP) and derived products, must be registered by the Department of Agriculture, Food and the Marine (DAFM) and the registration must be in date in accordance with Article 23 of Regulation (EC) No. 1069/2009 and Regulation 11 of SI 187/2014.. An operator from another Member State must be registered in their own jurisdiction.

#### **SECTION 2**

#### REGISTRATION

#### 2.1 Application for Registration

A person wishing to register to transport ABP and/or derived products must apply using application form 'AP28', which can be obtained by contacting the ABP section of DAFM on 0761 064440 or by email: AnimalByProducts@agriculture.gov.ie (Full contact details can be found on page 6 of this document).

#### 2.2 Animal by-products transport register

The ABP section maintains a register of all transporters of ABP and derived products as required by Article 23 of (EC) Regulation No. 1069/2009. This register is updated on a regular basis and is available for reference on the DAFM web site at Section XII at the following link:

http://www.agriculture.gov.ie/agri-foodindustry/animalbyproducts/euapprovedabpplants/

#### **SECTION 3**

#### CONDITIONS FOR OPERATING AS A TRANSPORTER

#### 3.1 RECEPTACLE REGISTER (FORM TR2)

Each transporter must maintain a register of the receptacles used to transport ABP and derived products from the point of loading to their respective points of destination. This should contain information on all skips, tipper trailers, fixed bodied trucks, road tankers, dedicated blood tankers, demountable tankers and any other type of vehicle intended for use in the transportation of ABP and derived products

#### 3.1.1 Description of the register

Every receptacle must be entered in the register under the following headings:

- i. Numerical identification (see Section 3.2 (a) on page 4 of this document)
- ii. The receptacle chassis number (if applicable)
- iii. Category of ABP or derived product for transportation
- iv. Registered owner

#### 3.1.2 Alteration to the register

Following initial registration, if a transporter wishes to add a receptacle to the receptacle register:

#### a) Adding a receptacle

• In advance of the new receptacle being used, the transporter must advise in writing of their intention and submit a copy of the updated register to the ABP Section of the Department. ABP Section will issue an amended Form TR2.

#### b) Decommissioning of a receptacle

If a transporter wishes to delist/decommission a receptacle then

- The receptacle must be washed and disinfected in accordance with DAFM instructions.
- A copy of the cleaning and disinfections certificate (Clean Form 3 see ABP trader notice TN 7/2016 (Appendix I) or an equivalent clean certificate must be obtained from an authority approved in advance by DAFM and kept by the transporter and be available for inspection by a DAFM Officer when required.
- The date of delisting and of cleaning and disinfection as indicated on the cleaning certificate must be entered in the receptacle register
- The transporter must advise in writing and supply a copy of the updated receptacle register to the ABP Section of the Department.

#### 3.1.3 Change from transport of ABP to derived product

If a transporter wishes to change the use of a receptacle from carrying ABP to derived products then

- The receptacle details must be altered in the register.
- The receptacle must be washed and disinfected in accordance with DAFM procedures.

#### 3.2 RECEPTACLE IDENTIFICATION

The identification of receptacles used in the transportation of ABP and derived products must consist of the following:

#### a) Numerical Identification

This identification number will consist of:

- a letter or letters corresponding to the transporter's company name or the processing company if it is the active transporter, e.g. *John Smith Transport*, *JST*. **The ABP** Section will assign this code to each transporter, and
- the transporter will then assign the numerical identification number to each of the receptacles, e.g. *JST001*, *JST002* etc.

#### b) Category description

In accordance with Chapter II of Annex VIII of 142/2011, all receptacles must be clearly marked as follows:

- Category 1 For Disposal Only
- Category 2 Not for Animal Consumption
- Category 3 Not for Human Consumption

All signs must be attached on both sides of the receptacle i.e. bolted, welded or riveted. It will not suffice to have the signs attached with glue magnets or slide in slots. The signs must be clearly legible and visible.

It is the responsibility of each transporter to put in place a system that ensures the receptacles recorded on their receptacle register are not involved in the transport and contamination of food, feed, the ingredients of food or feed and synthetic or organic fertilisers.

#### 3.3 GENERAL HYGIENE REQUIREMENTS

Chapter I & II of annex VIII of 142/2011 lays down the hygiene requirements for receptacles including

- All receptacles must be maintained in a clean condition
- The receptacles must be covered when transporting ABP or derived products and should show no evidence of leakage or damage.
- Consignments of animal by-products are kept separate and identifiable

#### 3.4 DOCUMENTATION REQUIRED DURING TRANSPORTATION

- a) Movement within Ireland
  - All ABP and derived products that are transported within Ireland must be accompanied by a commercial document in accordance with ABP trader notice TN

01/2015 (Appendix II). It is mandatory that the commercial document accompany the load at all times from the point of origin as specified on the commercial document.

- b) Movement to other countries within the European Union
  - All ABP and derived product transported within the European Union must be accompanied by a commercial document in accordance with ABP trader notice TN 01/2015. It is mandatory that the commercial document accompany the load at all times from the point of origin as specified on the commercial document.
  - For certain ABP material, as detailed in under Article 48, of Regulation (EC) No. 1069/2009, the competent authority at the place of origin must inform the competent authority of the place of destination of each consignment by means of the TRACES system,.
- c) Colour coding of receptacles used to transport ABP to other Member States. From the 1 July 2008 EU regulations introduced additional requirements for the marking of ABP being transported between EU Member States. ABP and derived products that are dispatched to other Member States must be in packaging, containers or vehicles that are labelled in accordance with ABP trader notice TN 02/2008. These requirements do not apply to ABP being transported within Ireland.

#### **SECTION 4.**

# SPECIFIC REQUIREMENTS FOR THE TRANSPORTATION OF MBM, TALLOW AND PAP

Trader Notice 02/2017 sets out specific requirements for Trailers used for the transport of MBM, Tallow and PAP.

Receptacles should be dedicated to category 1 or category 3 respectively.

#### 4.1 REGISTER OF TRAILERS

The management of each processing plant must maintain a register of the trailers used to transport the MBM, tallow and PAP produced at that plant from the point of loading to its point of destination. This includes the transport of MBM, tallow and PAP to and from storage plants.

Under no circumstances can MBM, tallow or PAP be dispatched from a processing/storage facility except in a trailer whose identification is recorded on the processing plant trailer register (which contains the following information):

- Numerical identification
- The receptacle chassis number
- Authorised category of MBM, tallow or PAP for transportation
- Owner
- Date of listing
- Date of delisting
- Date of cleaning and disinfection as indicated on the cleaning cert at the time of delisting (see ABP trader notice TN 7/2016)

An up-to-date register must be made available to DAFM staff for the processing plant and each storage plant being used by the company when requested.

#### 4.2 TRACEABILITY

For traceability reasons, operators dispatching material derived from category 1 and category 2 animal by-products must inform their own competent authority and the competent authority of the Member State of destination. The material must be transported directly to the point of destination, which must be registered or approved in accordance with Articles 23, 24 and 44 of Regulation (EC) No. 1069/2009.

#### 4.3 BACKLOADS

Under certain circumstances, trailers will be allowed to transport "inert" materials on a return journey.

If a processing company or a haulage company wishes to carry back loads of non-MBM/PAP material, it must apply in writing to: Animal By-Products Section, Department of Agriculture, Food and the Marine Grattan House, Grattan Business Centre, Dublin Road, Portlaoise, Co. Laois, R32 RY6V

The company must receive approval in advance from DAFM.

Inert materials include coal, quarried stone, etc. Upon application to DAFM the proposed material to be transported must be stated for consideration by DAFM and approval will be based upon only the material declared in the application.

Trailers carrying a back load must meet the following conditions:

- The trailer must be cleaned at the point of unloading of the MBM/PAP gross clean (all visible material removed)
- The weighbridge docket at the point of loading of the back load and the weighbridge docket at the point of unloading must be kept by the haulier and accompany the back load at all times. These documents must be stored in the trailer document box.

#### 4.4 CHANGE OF CATEGORY

Where for commercial reasons it is required to change the category transported in a trailer, the following requirements apply in the various circumstances prior to the intended date of change:

Change from Category 3 PAP to Category 1 MBM

• Amend the trailer register to reflect the trailer's new status

Change from Category 1 MBM to Category 3 PAP

- Amend the trailer register to reflect the trailer's new status
- A cleaning and disinfections certificate or an equivalent clean certificate must be issued to the veterinary inspector in charge of the processing plant.

It is the responsibility of each processing company to put in place a system that ensures the trailers recorded on their trailer register are not involved in the transport and contamination of food, feed, the ingredients of food or feed and synthetic or organic fertilisers.

#### 4.5 DAFM SUPERVISION

A DAFM officer will randomly check trailers involved in transport of MBM/PAP.

The dispatch of all processed product is to be recorded by plant staff in the processing plant/storage plants and be available to the DAFM officer for verification purposes. The following information, as a minimum, should be recorded:

- Date
- Weight consigned
- Associated weight docket number
- Trailer identification number
- Commercial document serial number

#### 4.6 SEALS

Measures must be taken by operators to enhance traceability and reduce the risk of tampering with containers transporting meat and bone meal, tallow and processed animal protein.

As detailed in Trader Notice 01/2017, operators must:

- Provide their own seals
- Nominate persons responsible for sealing containers
- Maintain a record of seals used and make it available upon request to DAFM staff
- Record seal numbers on the commercial document accompanying the consignment

#### **SECTION 5.**

#### TRANSPORTATION OF FALLEN ANIMALS

#### a) General hygiene requirements

In the case of operators registered to transport category 2 material in the form of fallen animal carcases from farm to category 2 establishment, a knapsack containing an appropriate disinfectant should be carried on each vehicle for the cleaning and disinfection of wheels prior to leaving each collection point i.e. farm.

#### b) Collector criteria

In order to be registered to transport category 2 ABP in the form of fallen animal carcases, a person must either:

- Be the owner/proprietor of an approved category 2 establishment
- Be in the employment of an approved category 2 establishment for the purposes of collecting carcases,
- If not an employee they must collect/transport on behalf of an approved category 2 establishment

#### c) Destination criteria

In all cases carcases must be delivered to one specific approved category 2 establishment plant that shall be named on the registration application. Therefore it is not possible for a registered transporter to deliver category 2 material to a plant other than that named on his/her registration application.

Where a fallen animal collector is not the owner or an employee of an approved category 2 establishment, it is the responsibility of the owner of the approved category 2 establishment plant to ensure that any person collecting/transporting carcases on his/her behalf abides by the terms and conditions of his/her establishment plant approval and the terms and conditions of the subsidy for TSE testing.

#### CONTACT DETAILS

For further information contact:

Department of Agriculture, Food and the Marine, Milk and Meat Hygiene/ABP/TSE Division, (Animal By-Product Section), Grattan House, Grattan Business Centre, Dublin Road, Portlaoise, Co. Laois R32 RY6V

Phone Number: 0761 064440

Fax Number: 057-8694386

Email Address: AnimalByProducts@agriculture.gov.ie

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#### APPENDIX I - TRADER NOTICE: ABP NO. 7/2016

#### Department of Agriculture, Food and the Marine

Trader Notice: ABP No. 7/2016

To: Operators of approved category 1 and category 3 rendering plants and

meat and bone meal (MBM) stores

Subject: Cleaning of vehicles in accordance with EU Regulations 1069/2009 and

142/2011, so as to alter carriage from raw products to derived products or

alter the designated ABP category of the vehicle

#### **Background**

- 1. Regulation (EU) 142/2011 (Annex VIII, Chapter I) sets out the dedication, disinfection and cleaning requirements of vehicles and containers used to transport animal by-products (ABP) and derived products.
- 2. This trader notice lays down the cleaning procedure that must be carried out when trailers are being rededicated for carriage and should be read in conjunction with the licensing conditions for hauliers of animal by-products.

#### **Location of cleaning**

- 3. Facilities where trailers transporting category 1 or category 2 ABP or derived products are cleaned must have a 6mm grid in place to capture material prior to entry to the waste water system.
- 4. Material collected in these grids must be disposed of in approved facilities in accordance with EU legislation.

#### Cleaning procedure

- 5. The following steps must take place during cleaning:
  - a) Visual assessment
    - A visual assessment of each trailer to establish the physical condition of the container.
  - b) Gross material
    - Any gross material must be removed from the trailer.
  - c) Wet cleaning
    - All surfaces must be washed using a high-pressure/low-volume water spray heated to 80°C to remove any residual MBM.

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d) Disinfection

- All surfaces must be sprayed using a standard disinfectant approved by the Department of Agriculture, Food and the Marine (DAFM) (see Animal Health & Welfare → Disease Control → Disinfectants on the DAFM website) with ingredients with proven efficacy against prions (Appendix 1 lists these ingredients and their concentrations).
- All surfaces must be rinsed down with the minimum amount of water and allowed to dry naturally.

Note: the choice of disinfectant must take account of the end use of the material to be transported – feed grade disinfectants should be considered in the case of category 3 material destined for use in feed or pet food.

#### e) Confirmation

A completed cleaning and disinfection form (Appendix 2) must be provided by the cleaning facility to the operator responsible for the trailer or container confirming that the procedure has been carried out. The form must be retained on file for a minimum of three years.

#### Vehicle canopies

- 6. Canopies must be cleaned and disinfected as outlined above.
- 7. Because of the difficulty in adequately disinfecting some receptacle canopies, and because of the nature of concurrent wear and tear that makes disinfection procedures difficult, it may be considered following inspection of the canopy that it be disposed of when a category change occurs or when the vehicle or container is rededicated from transport of raw ABP to derived products or vice versa. Evidence must be retained of the safe disposal of the old canopy.

DATE OF ISSUE: 12 DECEMBER, 2016

#### MILK AND MEAT HYGIENE/ABP/TSE DIVISION.

(ANIMAL BY-PRODUCT SECTION), GRATTAN HOUSE, GRATTAN BUSINESS CENTRE, DUBLIN ROAD, PORTLAOISE, CO. LAOIS R32 RY6V

PHONE: 0761 064440

FAX: 057 8694386

EMAIL: <u>ANIMALBYPRODUCTS@</u>AGRICULTURE.GOV.IE

#### Appendix 1

# Ingredients Demonstrating Efficacy Against Prions and Ingredients Demonstrating Less Efficacy

# 1. EFFECTIVE (>3 LOG10 REDUCTION WITHIN 1 HOUR AT TEMPERATURES OF 20C-55C)

Alkaline detergent (specific formulations)

Chlorine, 11,000 ppm

Copper, 0.5 mmol/L, and hydrogen peroxide, 100 mmol/L

Enzymatic detergent (specific formulations)

Guanidine thiocyanate, 13 M

Hydrogen peroxide, 59%

Peracetic acid, 0.2%

Phenolic disinfectant (specific formulation), 10.9%

Quaternary ammonium compound (specific formulation)

Sodium dodecyl sulfate, 2%, and acetic acid, 1%

Sodium hydroxide, x1 N

Sodium metaperiodate, 0.01 M

# 2. INEFFECTIVE (<3 LOG10 REDUCTION WITHIN 1 HOUR AT TEMPERATURES OF 20C-55C)

Acetone

Alcohol, 50%-100%

Alkaline detergent (specific formulations)

Ammonia, 1.0 M

Chlorine dioxide, 50 ppm

Enzymatic detergent (specific formulations)

Formaldehyde, 3.7%

Glutaraldehyde, 5%

Hydrochloric acid, 1.0 N

Hydrogen peroxide, 0.2%, 3%, 6%, 30%, 60%

Iodine, 2%

Ortho-phthalaldehyde, 0.55%

Peracetic acid, 0.2%-19%

Phenol/phenolics (concentration variable)

Potassium permanganate, 0.1%–0.8%

Quaternary ammonium compound (specific formulation)

Sodium dodecyl sulfate, 1%–5%

Sodium deoxycholate 5%

Tego (dodecyl-di[aminoethyl]-glycine), 5%

Triton X-100, 1%

Urea, 4-8 M

### **Appendix 2**

#### **Cleaning and Disinfection Form/Clean Form 3**

3. OWNER/NAME OF COMPANY 5.	4.	
6. ADDRESS OF COMPANY		
7. APPROVAL NO OF COMPANY (IF APPLICABLE)	8.	9.
10. CATEGORY OF MATERIAL	11.	
CURRENTLY TRANSPORTED	12.	13.
(DESCRIPTION)		13.
,	14.	
15. TRAILER / CONTAINER	16.	17.
IDENTIFICATION NUMBER		
<b>18.</b> DATE CLEANED AND		
DISINFECTED		
19. LOCATION OF CLEANING	I .	
20. CANOPY; PLEASE COMMENT (IF A 21. 22.	APPLI	CABLE)
23.		
24. I AM SATISFIED THAT THIS VEHIC WITH THE PROCEDURES SET OUT		IAS BEEN CLEANED IN ACCORDANCI RADER NOTICE: ABP NO. 7/2016.
1.24.1.1.1. Cleaning Facility Personnel or		
2.24.1.1.1. Authorised Officer's Signature		

3.24.1.1.1. Date

SAMPLE COMMERCIAL DOCUMENT

#### APPENDIX II - SAMPLE COMMERCIAL DOCUMENT

Company Logo/Name		SAMPLE COMMERCIAL DOCUMENT  Commercial Document for the transportation within Ireland of animal by- products and derived products not intended for human consumption in accordance with Regulation (EC) No 1069/2009		Serial Number		
1	Consignor	(sende	's name and address in full and, if	2	Consignee (receiver's name and	address in full and, if
-			number of the plant of origin)		appropriate, approval number of the	
3	Carrier, m	eans	of transport	4	Quantity/Identification of o	consignment
3.1	Carrier (haulier's name and address in full)			4.1	Weight of ABP's (kgs) or m	
				4.2	heads) Date of despatch:	
				4.3	Container Number (if applicab	
3.2	Registration 1	numb	r of vehicle	4.4	Number of seals (if applicab	•
5 5.1			e animal by-products or de nimal by-products or derived			
		) Ca	egory 1 Material -	'For	Disposal Only	
		) Ca	egory 2 Material -	'Not	For Animal Consumption'	
		Э ма	nure and Digestive Tract Con	itent - 'Mai	nure'	
5.2	The descrip		egory 3 Material - f animal by-products or deriv		For Human Consumption' g. rendered fats, processed animal	protein, etc:
5.3			-		d for use as feed, the species from	
5.4	In the case products an a) Parts o b) Parts o In the case following d	of ani e deri f slau f slau of (a) of Ca etails	mal by-products for use as rav yed from, (DELETE AS APF ghtered animals fit for human ghtered animals unfit for hum or (b), please specify nature a egory 1 material, dispatched t	w petfood or in PROPRIATE) a consumption a consumption and method of the from a Category or TSE testing?	feed for fur animals, please state caccording to Article 10a of Reg. 1 according to Article 10(b)(i) of treatment:	where the animal by- 069/2009 Reg. 1069/2009
5.4	In the case of products and a) Parts of b) Parts of In the case of following d	of ani e deri f slau f slau of (a) of Ca mate	mal by-products for use as raw red from, (DELETE AS APF ghtered animals fit for human ghtered animals unfit for hum or (b), please specify nature a egory 1 material, dispatched to ial eligible for the subsidy for e skip/container contain BSE	w petfood or in PROPRIATE) consumption a lan consumption and method of the from a Category TSE testing?	feed for fur animals, please state caccording to Article 10a of Reg. 1 according to Article 10(b)(i) of treatment:	where the animal by- 069/2009 Reg. 1069/2009
5.4	In the case of products and a) Parts of b) Parts of In the case of following discounts of the case of	of ani of slau f slau of (a) of Ca etails mate	mal by-products for use as raw red from, (DELETE AS APF ghtered animals fit for human ghtered animals unfit for hum or (b), please specify nature a regory 1 material, dispatched in tial eligible for the subsidy for e skip/container contain BSE the Consignor. I, the consign	w petfood or in PROPRIATE) I consumption a lan consumption and method of t from a Categor  r TSE testing?  positive water?  or, declare that ported in accor	feed for fur animals, please state caccording to Article 10a of Reg. 1 n according to Article 10(b)(i) of treatment: y 1 or Category 2 Intermediate Pl Yes No	where the animal by- 069/2009 Reg. 1069/2009
5.4	In the case products are a) Parts o b) Parts o In the case following d  Declaration correct and	of ani of slau f slau of (a) of Ca etails mate	mal by-products for use as raw red from, (DELETE AS APF ghtered animals fit for human ghtered animals unfit for hum or (b), please specify nature a regory 1 material, dispatched in tial eligible for the subsidy for e skip/container contain BSE the Consignor. I, the consign	w petfood or in PROPRIATE) consumption a nan consumption und method of t from a Categor r TSE testing? positive water?	feed for fur animals, please state concording to Article 10a of Reg. 1 according to Article 10(b)(i) of treatment:	where the animal by- 069/2009 Reg. 1069/2009
5.4 5.5	In the case products an a) Parts o b) Parts o In the case following d Is  Declaration correct and 1069/2009	of ani e deri f slau f slau of (a) of Ca etails mate oes th	mal by-products for use as ray red from, (DELETE AS APP ghtered animals fit for human ghtered animals unfit for hum or (b), please specify nature a regory 1 material, dispatched f rial eligible for the subsidy for re skip/container contain BSE re Consignor. I, the consign re consignment is being trans  (signature)	w petfood or in PROPRIATE) I consumption a lan consumption and method of t from a Categor TSE testing? positive water? or, declare that ported in accor	feed for fur animals, please state concording to Article 10a of Reg. 1 according to Article 10(b)(i) of treatment:  y 1 or Category 2 Intermediate Pl Yes No	where the animal by- 069/2009 Reg. 1069/2009  ant, please supply the  in sections 1 to 5 is egulation (EC) No
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