



Comments to the Working document of the Scientific Panel on Additives and Products or Substances used in Animal Feed on the development of an approach for the environmental risk assessment of additives, products and substances in animal feed – Document for public consultation

**Panel on animal feed of
The Norwegian Scientific Committee for Food Safety
31st of October 2006**

The Panel on Animal feed of the Norwegian Scientific Committee for Food Safety considers the document a comprehensive and a novel approach to environmental risk assessment of additives, products and substances in animal feed. The inclusion of the methodology for the risk assessment of additives in fish feed is particularly of interest for Norway considering the relative commercial importance of this type of farming in Norway.

The Panel has a few specific questions and comments to the document:

P36. The reasoning for the PEC calculation for cage farming not including the water fraction could be better explained in the document.

The table on p36:

- What is the source of the conversion factor (4.3) – is there a reference for this?
- There is a footnote According to Corner et al – what is this referring to?
- The Table gives “Cfeedadditive” whereas the calculation gives “Cadditives”, similarly it gives “DEPTHsed” instead of DEPTHsediment” – we suggest to harmonise the two. Also in the Table at the top of p37 – “PECswt” in the table and PECsw” in the calculation.

In line 1180 and in the top line of the second Table on p37 it says “For feed consumption” is this not “feed conversion”?

Please provide references for the values given for the different feed conversion factors in the second table on p37.

Definitions appear to be missing for the calculation for degradation in sediment on p38.

In line 1225 it should read Appendix III rather than Appendix II