

Ministry of Food, Agriculture and Fisheries of Denmark

The Danish Veterinary and Food Administration



European Commission
Directorate-General Health & Consumers
B - 1049 Brussels
Belgium

Date: 19 November 2014
Case no. 2014-29-29-00566
Ref.: fvst/bbj
Tel: +45 72276900
Mail: 29@fvst.dk

Dear Ladislav Miko,

Referring to our constructive meeting on 8 July 2014 I want to remind you of the Danish concern about the widespread use of Copper as a feed additive and the identified correlation between the use of Copper and development of antimicrobial resistance.

With this letter, I strongly urge you to ensure that EFSA is asked for an opinion on the use of Copper as it has been done for Zinc. In particular, the evaluation shall take into account:

- The environmental accumulation of Copper, and the following consequences,
- The risk of antibiotic resistance introduced by the use of Copper, and
- The physiological need of the animals for Copper.

This request has the following background:

- The present maximum levels of Copper in feed are based on a SCAN-opinion¹ requested by the Commission and adopted in 2003. The opinion resulting in lowering of the maximum permitted level of Copper recommended that the "Levels of Copper allowed in feed ...should be kept under scrutiny in the light of the possible evolution of the authorised load of Copper on soil". In addition, SCAN underlined that "...further work is needed to establish whether the use of Copper, particularly at the highest permitted level in feed, can inadvertently co-select for antibiotic resistance".
- In the pre-assessment report of the environmental impact of Zinc and Copper used in animal nutrition² from 2010, it is concluded that although the overall environmental risks for Copper and Zinc was acceptable at the current time, future risks could occur especially in areas of acid sandy soils. Flanders, the Netherlands, north-western Germany and Denmark are mentioned, and it is underlined that "There is a clear need to better establish whether such soils are as sensitive to metal inputs as predicted here" in the report. The area around Ringkøbing in Denmark, an area where swine rearing locally is significant, is specifically

¹ Opinion of the Scientific Committee for Animal Nutrition on the use of Copper in feedingstuffs, adopted on 19 February 2003.

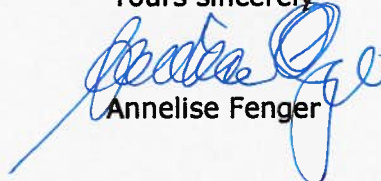
² Pre-Assessment of Environmental Impact of Zinc and Copper Used in Animal Nutrition (C. Monteiro et al., 2010). Scientific/Technical report submitted to EFSA.

mentioned as "...most sensitive" and "where the application of most manure types for 50 years is predicted to result in PNEC exceedence".

- In the Scientific opinion on cupric sulphate pentahydrate published in 2012³, EFSA mentions that the applications of piglet manure have been identified as potential risks to soil organisms. EFSA also highlights that although the data available are limited, it indicates that high Copper concentrations in the microbial environment increase the number of Copper resistant bacteria, and that Copper resistance seems to be correlated with more frequent resistance to several antibiotics in certain bacterial species. In addition EFSA mentions the risk of co-transfer of Copper and macrolide antibiotic resistance, e.g. erythromycin.
- In early spring 2013 it was foreseen by the Commission that EFSA should evaluate Copper and Zinc compounds as groups in connection with the re-evaluation of all feed additives. At the meeting of the Standing Committee on the Food chain and Animal Health, Animal Nutrition division on 15 and 16 September 2014, the Commission informed Member States that EFSA considers that their opinion on Zinc⁴ also includes the necessary information about the future Copper levels in feed. However, Denmark does not agree that the information on Copper in the Zinc report is a sufficient basis for adjusting the maximum level of Copper in feed. The report contains no data on the physiological requirements for copper in the various categories of animals and no information on the potential reduction of the currently authorised maximum Copper content in complete feed. Furthermore, it does not deal with the identified correlation between the use of Copper and development of antimicrobial resistance.

In Denmark, we do not regard it as acceptable that the use of an additive contaminates the soil to a degree that may seriously harm our farm land within a time span of 50 years. Further, the potential risk of development of resistance due to the use of Copper in feed is rightly a major political issue in Denmark. We therefore urge the Commission to ask EFSA for an evaluation of Copper with the aim of reducing the maximum levels in feed.

Yours sincerely



Annelise Fenger

³ Scientific Opinion on the safety and efficacy of copper compounds (E4) as feed additives for all animal species: cupric sulphate pentahydrate based on a dossier submitted by Manica S.p.A., EFSA Journal 2012; 10(12):2969.

⁴ Scientific Opinion on the potential reduction of the currently authorised maximum Zinc content in complete feed. EFSA Journal 2014;12(5):3668.