

EVALUATION OF STDF PROJECT 56

**PROJECT FUNDED BY THE STANDARDS AND TRADE
DEVELOPMENT FACILITY**

**CAPACITY BUILDING FOR THE IMPLEMENTATION
OF THE CODEX ALIMENTARIUS CODE OF
PRACTICE FOR ANIMAL FEEDING**

ASSESSMENT REPORT

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Report submitted on 28 May 2007

EXECUTIVE SUMMARY

The main goals of the Standards and Trade Development Facility (STDF) through its projects is to provide for a coordination mechanism by which it complements the current and expected future assistance efforts, to achieve additional improvements in the quality of assistance work, to assist developing countries to acquire the capacity to contribute to the development of and to meet international sanitary and phytosanitary standards and to complement other technical assistance trust funds managed by the WTO.

Overall, this objective has been only partially achieved by STDF project 56 "Capacity building for the implementation of the Codex Alimentarius code of practice for animal feeding". There are various elements in the project that have not yet materialised and which contribute to this conclusion.

A project desk assessment, an audit at IFIF Headquarters, interviews with EU Commission stakeholders, and the circulation of a questionnaire to a large number of "feed stakeholders" were performed to reach conclusions in this assessment.

On the current project *sensu stricto*, the desk assessment and audit revealed that the output of the project is rather poor as the Feed Manual is still in its draft phase, and hence its translation not done. The workshops have taken place but there is very little evidence of how the project was implemented at these occasions, also the foreseen training workshops have not taken place (at least not as intended by STDF). The financial and technical management of the project has been poor, mainly because the contractor had not been informed of any obligations from the side of the STDF Secretariat in that respect.

From a wider perspective however, the majority of the respondents to the questionnaire (mainly workshop participants) assessed the project as positive and it is clear that the initiative of drafting this manual as well as bringing together several stakeholders in order to find a pragmatic approach towards implementing the Codex Alimentarius Code of good animal feeding practice (Codex Code) is very beneficial to all. In addition, the project drew the attention to the importance of ensuring feed safety as part of the food chain and the ultimate goal of ensuring safe food for consumers. The workshops in particular triggered the feed industry's attention to enhanced cooperation and consciousness on the importance of harmonisation of feed safety standards. This in itself is an important achievement, which could not have been done without the STDF funding but which of course needs to be further built on, a task which IFIF continues to do.

Many developing countries emphasised the need for basic guidance in the area of animal feeding and, although most respondents had not yet seen the draft Feed Manual, there was general consensus that this project should open doors for future follow-up activities that complement the current output.

In this respect it can be concluded that, upon certain conditions, the STDF intention to add value a.o. through addressing longer term issues of capacity and compliance, has certainly been met in this project. The project has achieved a better understanding of the Codex code, but now the latter still needs to be implemented. Therefore, in order for the current project to be really beneficial and to exploit its full potential, follow-up actions need to be assured through fully achieving the current project objectives firstly and then complemented by targeted tailor-made training programmes involving the pertinent stakeholders at all levels to ensure the Codex Code implementation. Another follow-up action, which needs to be initiated by the beneficiaries themselves, is the establishment of national feed industry associations where not yet in place and the establishment of necessary basic structures in developing countries. For the latter further funding may be necessary.

INTRODUCTION

The goals of the STDF are defined as follows:

- to complement the current and expected future assistance efforts by bilateral agencies, to draw upon and apply important implementation lessons from recent assistance efforts in this field, and
- to achieve additional improvements in the quality of assistance work through deeper collaboration among major multilateral agencies working in this field.
- to assist developing countries to acquire the capacity to contribute to the development of and to meet international sanitary and phytosanitary standards.
- to complement other technical assistance trust funds managed by the WTO which aim to mainstream trade into development policy, notably the Integrated Framework and JITAP.

At its Working Group Meeting of 9 March 2005, STDF 56 (Capacity building for the implementation of the Codex Alimentarius Code of Practice for Animal Feeding) was approved to be eligible for funding and should be funded, pending the clarification of some questions. These were the following: whether a possibility to hold a seminar in Africa was foreseen and some more specificity was needed as to the target audience of the workshop and the workshop follow-up. Both questions were addressed and consequently the project has been funded. The International Feed Industry Federation (IFIF) was an eligible NGO with a partner in a developing country (FAO) and hence "the project from a non-least-developed country or eligible organisation in non-LDC" was approved.

The Codex Alimentarius ad hoc Intergovernmental Task Force on Animal Feeding has developed an internationally agreed Code of Practice on Animal Feeding in 2004. It was felt that collaboration between the feed industry, livestock producers and government agencies was required in the application of this code. To support such collaboration, the project aimed at the preparation of detailed manuals and guidelines for the industry and would offer workshops and training, through international collaboration, to the emerging feed producers and feed industries in developing and emerging countries. This would enable the uniform implementation of the Codex Code. Collaboration between FAO and the International Feed Industry Federation would enable to achieve such harmonised implementation, which would automatically promote feed trade opportunities.

The STDF 56 project objectives were to help ensure the safety of food for human consumption through the development and implementation of good animal feeding practice at the farm level and good manufacturing practices during the procurement, handling, storage, processing and distribution of animal feed and feed ingredients for food-producing animals. This was to be achieved through the production of a **manual and guidelines, workshops**, and through subsequent national and regional **training programmes**.

The project expected outputs were:

- the publication of a Manual of Good Practices for Animal Feeding including:
 - GAP and HACCP for the Feed Industry
 - Feed Industry Standards for Feeds and Feed Ingredients

- Quality Assurance for Feed Manufacturing in Developing Countries
- guidelines for trade in animal feed
- translation into English, French, Spanish, Arabic and Chinese.
- a series of regional workshops in support of the implementation of the Codex Code

The estimated budget to achieve these outputs was 150.000 USD in total provided by STDF. Non-STDF contributions consisted of 20.000 USD from FAO and 50.000 USD from industry. The work would start in March 2005 and would cover a maximum of two years.

The objective of the current assessment is to:

- verify whether the project achieved the objectives set out in the project document
- identify if the project has achieved any of the higher level objectives of the Facility, e.g. a measurable impact on market access, an improved domestic, and where applicable regional, SPS situation, and poverty reduction,
- identify key lessons learned for the benefit of both recipients and donors and for future STDF programme development.

The assessor works at the European Commission, Directorate General Health and Consumer Protection, Unit international multilateral relations. There are no conflicts of interest as she does not work in the area of "Feed" nor for "Codex Alimentarius".

METHODOLOGY

Several tools were used to come to a correct, reliable and objective assessment of the STDF 56 project.

❖ Desk assessment

In order to get a clear picture of the issues at stake, a desk study was undertaken to enable the assessor to have sufficient background to understand the issue, to address the STDF 56 report in a pragmatic way and to draw the most appropriate conclusions and recommendations from it.

The following documents have been consulted:

- IFIF STDF project 56 report: Capacity building for the implementation of the Codex Alimentarius Code of Practice for Animal Feeding
- project STDF 56 draft IFIF/FAO Feed Manual: Good Practices for the Animal Feed Industry
- Codex Alimentarius Code of practice on good animal feeding (CAC/RCP 54-2004);
- Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety;
- Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules;
- Regulation (EC) No 183/2005 of the European Parliament and of the Council of 12 January 2005, laying down requirements for feed hygiene;
- the FEDIAF guide to good practice for the manufacture of safe pet foods (November 2006, rev. 8);
- United States Food and Drug Administration: Framework of the FDA animal feed safety system (second draft);

In addition several stakeholders were interviewed at the European Commission. As they had not been involved in any of the actions under this project (apart from one official) they have provided an independent view on the usefulness of this project and its outcome, but looked at it from a European perspective. FAO was contacted to provide more clarification on its role, but no reply was provided (reason unknown).

❖ Visit to IFIF

On 4 May 2007 IFIF (International Feed Industry Federation) Headquarters were visited (Cheltenham (UK)) in order to discuss the project with Mr. Roger Gilbert, Secretary General of IFIF. The discussion focused on the questions to be formulated in the questionnaire, the list of stakeholders to be contacted, the lessons learnt and the views of the project management on where to go from there, but it also included an audit of the technical and financial management of the project in its different phases. A list of questions was sent to Mr. Gilbert in advance of the meeting to enable

preparation. The visit took place in a friendly atmosphere and Mr. Gilbert and his team offered full cooperation on the assessment.

As a preliminary remark, Mr. Gilbert correctly mentioned that he was never informed at the onset of the project that the project would be evaluated. This entailed that he had not kept all records and relevant documentation.

❖ **Circulation of a questionnaire**

In order to collect an independent view of beneficiaries on the project and its outputs, a questionnaire was developed. This tool also added an extra dimension to the assessment as it provided for the opinion of the "feed stakeholders" themselves.

On 8 May 2007, the questionnaire (attached in annex I) has been circulated to about 650 stakeholders, thanks to the technical support of the STDF Secretariat and thanks to IFIF for providing the largest part of the addressees, and time was given until 21 May to reply. The questionnaire has been circulated to all participants of the Nairobi, Goa and Sao Paulo workshops, as well as to the Members of the Codex intergovernmental task force, to stakeholders involved in the project itself, and to other stakeholders in international organisations. Only very few delegates to the China and the Egypt conference have been invited to respond to the questionnaire, merely due to logistical and translation reasons. As IFIF itself had no lists of participants to the different workshops, this information needed to be provided by the national organisations. In some cases this caused substantial delay.

The following standard evaluation criteria were used in the questionnaire, which form the basis for a clear set of conclusions and recommendations: relevance, effectiveness, efficiency, impact, sustainability and lessons learnt.

The replies to the questionnaire were collected until 24 May and processed in the most suitable way, using an Excel format. The questionnaire (in English) itself was set up with as many closed questions as possible in order to facilitate its processing. During the processing of the replies, and apart from the overall assessment, account was taken of the type of respondents i.e. whether they work for the private feed industry, were government representatives or not belonging to either category, as well as of their geographical origin. The latter was done in order to enable distinction between developing and emerging economies as well as between different points of view towards the project. The assessment is as complete as feasible within the limits of the time constraints and taking into account the number of respondents.

FINDINGS AND ANALYSIS

1/ The **desk assessment** revealed that the IFIF/FAO Feed Manual latest version dated from October 2006 and was not yet finalised. It also revealed that several Feed Manuals in which good agricultural practices, good hygienic and manufacturing practices and HACCP are described already exist, either by sector or at national level. However the current manual would be the first one to be set up internationally, bringing together all volunteering stakeholders and covering the whole of the feed industry at large. It is to be regretted that not more international players have opted to be involved in this initiative.

2/ During **the visit to IFIF** the following questions were addressed.

The answers were all provided by Mr. Gilbert, unless stated otherwise, and the replies reflect the situation as it was at the time of the visit.

a/ related to the TERMS OF REFERENCE

- what was the role of the partner institution FAO in the project?

IFIF has set up a structure similar to a "joint-venture" with FAO in order to reach both governmental staff in developing countries (DC) as well as the private industry. FAO is particularly active in Africa and therefore these contacts facilitated very much the networking on that continent whereas IFIF itself had more contacts in Latin America. This structure was set up as a result of the approval of the project, after the "global feed and food congress" in Brazil, 2005.

- As the FAO logo appears on the draft manual, it infers that FAO fully endorses it and that it can be seen as an official joint IFIF/FAO document. Is this assumption correct or what is the meaning of the FAO logo on the draft report?

Mr. Gilbert explained that the draft manual was now with FAO for peer review. In his view there would not be a problem because a similar manual existed for meat hygiene, and it was on the same basis that the Feed manual had been set up. However, he mentioned that FAO had asked to remove the draft manual from the IFIF website (access for IFIF Members only), because FAO still had to peer review it.

- Does the cooperation with FAO not run counter its role as the mother organisation of Codex Alimentarius, and hence the ad hoc intergovernmental Codex task force on animal feeding, as the manual provides for an interpretation and guidance of the Codex code and hence goes further than the code (on which further work has stalled)? Under these circumstances, the impartiality of FAO appears to be put in question.

Mr. Gilbert suggested asking clarification to FAO on this point, as he would also do. So far no reply has been received.

- How well were the project objectives achieved?

The project contributed to a better awareness of the role of feed safety in providing safe food.

- how well were the project activities followed, how well was the workplan followed and what were the impediments that made it deviate from the original workplan?

It is the intention of IFIF that its Members fully support the manual and are persuaded that it is to be used as a practical tool. To this end, the draft manual had been circulated to IFIF

Members for their comments and review, which was reported to be still ongoing. In order to achieve "ownership" by the feed industry, substantial delays had taken place as time was provided for this review. As an example it was mentioned that China had taken almost a year to come back with comments (including translation into Chinese). Currently, although it was not very clear whether the review period had been closed, the draft manual was being peer reviewed by FAO. Although indicated in the project report that the manual would be available "early 2007", printing was now foreseen in the period June-July 2007.

Two workshops were postponed because of the following:

- Nairobi (Kenya) was delayed (from May to June 26-27, 2006) because it has been included in the FAO Regular Programme Activities for 2006 under the programme entity: Veterinary Public health and Food Safety.
- Cairo (Egypt) was delayed (from March to September 11-13, 2006) because of the outbreak of Avian Influenza which created a serious impediment to the staging of a Regional Workshop on Good Practices for the Meat and Livestock Sector that attracted feed and feed-related experts from 16 of the Near East member countries.

- how well were the project outputs achieved?

The manual is in its final draft stage (version October 2006) and is now being peer reviewed by FAO. The intention is to finalise and print it in June-July 2007. Obviously translation of the manual into 5 languages has not yet taken place because of the aforementioned reason.

The planned workshops were held, although the timing was not fully respected (see above). The scheduled workshops have taken place as follows:

- in Sao Paolo, Brazil, July 14-16, 2005
- in Goa, India, September 16, 2005
- in Beijing, China, December 15-16, 2005
- in Nairobi, Kenya, June 26-27, 2006
- in Cairo, Egypt, September 11-13, 2006

It is not very clear however under which format these workshops were held as most of them were part of a conference. In addition a workshop took place in Thailand (not planned).

The training programmes have not materialised, at least not as intended by STDF. They took place during the IFIF Board meetings, the IFIF/FAO business meetings in Rome and the F4 Feed Summit. The type of training provided was not well defined and only provided to IFIF members, but no STDF money was spent on it. No other training programmes have been designed or are planned to be designed under STDF 56.

- how does IFIF envisage the next step i.e. the adoption by industry of the manual?

There are two steps:

- FAO assesses if it meets the criteria for publication under the FAO umbrella
- IFIF sees to it that international feed magazines support the manual and continues promoting this approach at multiple events.

- how does IFIF assess the project impact?

The project impact cannot be assessed at this stage as the Codex code has to be adopted and implemented by industry, which is not yet the case. However the manual is the first common document ever in the feed industry and therefore its impact has already been substantial

because of the bringing together of different stakeholders (feed and food industry, feed associations). This has now led to a much more united global feed group. A visible consequence of this enhanced networking is e.g. the monthly feed industry teleconferences at which much more people attend since the workshops.

- financial part: it is not clear how the 20.000USD (or 40.000USD?) from FAO and the expected contributions from industry (50.000USD) were spent.

IFIF has not kept detailed records of the moneys spent. An invoice of 20.000USD was sent to FAO to get reimbursement of workshop costs in Nairobi. The industry contribution had not been quantified correctly but a rough estimate of industry investment was done (paid by IFIF, and its Members).

- what is meant by consultants and contracts (in the financial breakdown)?

There is no clear-cut distinction in roles between the costs calculated for consultants and the contractor. The contractor (Mr. Dave Bossman) was the person who provided for the first draft of the manual, who went to FAO Headquarters to discuss the set-up of it. The consultants (3 in total) delivered either specialised detailed services content-wise (Mr. Brian Cooke), provided for general overseeing of the manual (Mr. Steve Auman) or were involved in the planning and resource management (Mr. Roger Gilbert). This breakdown is not reflected in the project report and therefore each role is not very clear.

Supporting documents related to the costs incurred by the service provided were present (finding on the basis of a random sampling), but it concerned only e-mail declarations, without evidence of individual receipts and payments. Also the link between these "real" costs and the amounts indicated in the financial breakdown related to the project is not clear. IFIF did not see it appropriate to ask for the full evidence as it stated that the amounts indicated in the project financial breakdown were only indicative and were surely lower than the "real" costs, as the time invested by the consultants was surely not covered.

The costs involved in the organisation of the workshops are not transparent as for some it covers only travel expenses of IFIF representatives, whilst for Sao Paolo and Cairo it appears to cover more than this. It remains however unclear what exactly the amounts for the latter activities have been used for. For the India, China and Kenya events, all costs related to organising the workshop were borne either by the national feed associations, or for Kenya advanced by IFIF and then to be reimbursed by FAO. Currently IFIF has asked IFIF participants whether the estimated costs for the China and India workshop provide for a fair reflection of real costs.

Evidence of "real costs" will not be forwarded to the STDF Secretariat by IFIF.

There was no evidence of transfer of moneys for any activities or services under the project contract. No separate bank account was held and it was impossible to track any financial transfers.

b/ related to the CONTENT

i/ Project STDF 56

- on the manual (appreciation by the assessor)

The idea of producing this manual clearly meets a need for the feed industry. This is evidenced by the fact that the industry from different parts of the world has invested

substantial time in providing comments to it. It is therefore an interesting and valuable initiative of the global feed industry to draft this manual with the overall objective to provide for clear and global guidelines on how to implement the Codex code.

The setup of the manual (separate chapters and sections) is well thought through as it provides for the possibility to add, amend and modify parts as Codex work on this issue evolves. This reason is clearly explained in the manual and is certainly positive.

However, at first sight the manual appears not very user-friendly. Several examples are provided to substantiate this.

The numbering used in the subchapters is confusing. This numbering, which reflects the one in the Codex code, appears sometimes on the cover page of the chapter, whilst in other chapters different references to the Codex code appear in the substance of the chapter. (As an example Chapter 3, the cover page includes §9 and §23-26 of the Codex code whereas the text itself refers only to §7-9).

In addition, some chapters do not cover what the title indicates. (As an example Chapter 7 on auditing, the cover page refers to the §12 of the Codex code on traceability. However this § is not taken up in the specific chapter on labelling and traceability (chapter 4). On the other hand under the chapter 7 on auditing, the subtitles refer to issues that have nothing to do with auditing, most surprisingly no guidance on auditing is provided. This is however to some extent covered by chapter 4: third-party certification programmes auditor).

Some chapters contain very little guidance, other than the references to the Codex code (e.g. chapter 6 on "on-farm practices"). As this concerns practices which appear to be the most susceptible to different interpretation, one would expect more guidance on this issue. Especially in view of assisting developing countries' farmers, this chapter might have been elaborated in more detail.

In section 2 (feed ingredients) tables are provided which list feed ingredients. However the language used is not internationally accepted (the energy units are expressed in cal/lb, the definitions used are not consistent throughout the tables (sometimes the word "ingredient" is used, whereas in others it is mentioned as "feedstuff"). In the tables on "special purpose products" references to FDA regulations are mentioned: here again only American language is used.

Section 13 on the list of national Codes of Practice is far from complete.

Mr. Gilbert replied that the goal of the manual is exactly to remain general because it cannot dictate what others need to do. Also the feed industry consists of multiple types of producers that all have their peculiarities in terms of specific GHP/GMP/HACCP requirements. It would be impossible to cover all these issues in this manual because it would then lose its merit. He mentioned that due to the difficulties with Section 2, it is not clear at this stage whether this section will be published.

- on the workshops:

In the Terms of Reference the goal of the workshop was to further develop the scientific basis of the principles and guidelines, and to promote the dissemination of information and acceptance of the Code and the elaborated guidelines.

- How were the scientific basis of the principles and guidelines of the Codex code further developed?

At the workshops the main topics of discussion were GMP, HACCP, promotion and implementation of the Codex code, very much feed and food safety oriented.

- how well was this goal achieved, is there any evidence thereof and how was this measured?
Organisation and advertisement of the events was mainly in the hands of the national feed associations, without specific IFIF involvement. No documents or information was available at IFIF on the workshops.

- how were participants selected

Participants were not selected: the members of the national feed associations were invited and wider advertisement of the event was done. In principle, anyone who was interested could attend.

- how were participants informed of and prepared for the workshop, did they get preparatory documents

No

- what was the format of the workshops (lectures, active participation, interactive)

In Kenya and Egypt the format was as a workshop with a lot of interaction of the audience. At the other events the focus was on lectures/presentations, some break-out sessions. At all events the social networking part was a substantial part of the "agenda". Traditionally feed industry representatives have seen each other as competitors. IFIF has succeeded through this project to bring many peers together and enhance cooperation.

- what was the output of the workshops and was it different according to the geographical region, the kind of participants (industry vs. government, less developed vs. emerging economies)

The output is difficult to measure but it certainly triggered several countries in which such initiative did not yet exist to start reflecting on setting up national feed associations. The largest divergence can be seen between the African and the Latin American workshops. In Africa, the feed industry is still very basic and at development level, whereas in Latin America it is very well established.

- on the training programmes

- have any actions been undertaken so far to follow-up on the project's achievements,
No follow-up is foreseen.

- have any further training programmes been undertaken to develop national and regional capacity for safe feed production and utilisation?

The only training performed so far was during IFIF Member meetings.

ii/ overall STDF goals

- how well does the manual meet the need of all types of potential feed producers (smallholder farmers, local feed manufacturers, larger feed industry in Least Developed Countries, in emerging economies), how would you best describe to which target audience the manual responds best?

As the manual, once it will be finalised, will be clearly "owned" by the Feed Industry, it responds very well to their needs (feed industry and on-farm formula mixers).

Animal feeding practices are not clearly known in Least Developed Countries, mainly African countries. A first need arises to map these, to review the current situation and then make

recommendations on what steps are to be taken to promote formulated feed and to provide for all the necessary support to make this happen. Currently the manual does not meet the needs of these small holder farmers who do not use formula.

- has the project got any measurable impact on market access, on an improved SPS situation (in this case being improved feed production in terms of quality and safety), or on poverty reduction.

IFIF is a key player in promoting safe feed production. It is clear that feed, which is compliant with the Codex code, has a good chance of being imported into developed markets. In its attempt to promote the Codex code, to raise awareness about it, to draft the manual which provides for a globally harmonised approach to the Codex code, the project has certainly a positive impact on market access and on an improved SPS situation, especially in emerging economies. The positive effect on LDC is that awareness has been raised and the benefits of feed associations have been shared.

-Was sustainability adequately considered at the project design phase?

IFIF wants the manual to be used. To this end it attaches a lot of attention to keeping it fully in line with Codex Alimentarius developments and to promoting a good dialogue between industry and government representatives. Through the manual and the workshops these goals have been achieved.

iii/ key lessons learnt

- What are according to IFIF the main lessons learnt from this project

-for the recipient (IFIF): the need for setting up national feed associations, the need to know the feed profile of each country, sound feed statistics, the need to establish international networks, need to have connections with Codex Alimentarius as the standard setting body.

- donor (the STDF Secretariat): the terms of reference for projects need to be much better elaborated (what documents need to be kept, a mid-term review, establishing a mechanism how to do this, maybe envisage a participatory role of STDF in the events). Mr. Gilbert repeated that it was not clear that the project would be evaluated, therefore not all necessary documents were available. STDF funding was mainly used to support activities that otherwise would not have been possible.

- How would IFIF envisage to follow-up on this project?

What lessons can be learnt from the project as to the process of project design and implementation?

It is difficult to assess, certainly in a small two-year project, whether the set deadlines can be achieved. Certain flexibility should have to be built in in order to compensate for major force delays. Another example thereof is the following:

There are several outcomes of the STDF 56 project that were unexpected. The most significant is the reshaping of the way the Federation is developing. Rather than a global group with national feed associations only connected to IFIF in the UK, there is the opportunity for national feed associations to become better connected within their own regions. For example, from the outset IFIF's Brazil's member association, Sindiracoés, undertook to develop stronger links with other national associations within Latin America. This has resulted in the setting up of the Latin American Feed Trade Association (LAFTA) at the most recent Global Feed & Food Congress which took place in Sao Paulo in April 2007. That group comprised 40 individuals representing several feed associations and a number of

other countries. This group has the full support of the FAO Regional Office (Chile) working in co-ordination with Rome which links back to IFIF. This same process is beginning to be established in Southern Africa. Although a looser formation - voluntary and non-formal - the South African Animal Feed Manufacturers Association has taken up the role of organiser and so far has four countries agreeing to work closer together. They have formed themselves into the WECSAFA (West, East, Central and Southern Africa Feed Association).

What lessons can be learnt from the project which are of importance to the broader donor community and which should be disseminated more broadly.

- that public groups can work with industry to achieve a pre-defined objective
- bringing together the resources and efforts of the IFIF and FAO can be extremely beneficial in addressing issues such as feed safety
- that the quality/safety of raw materials is a prerequisite to safe finished feed
- that the feed industry must have support – particularly in DC - to identify/analyse what is in raw materials being put forward for use before they are processed into feed. Commercial practices in developed countries automatically takes care of this aspect of feed safety (although lessons are still being learnt), but this is often not the case in emerging and developing economies.

3/ Replies to the **questionnaire**

The questionnaire itself was set up with as many closed questions as possible in order to facilitate its processing. Nevertheless, some respondents have not answered all questions, probably because they were not able to assess them or did not see it applicable. Notwithstanding this, it does not have a significant impact on the overall appreciation. Some respondents have not answered the questionnaire as such, but have provided comments of a more general nature, which are also reflected.

In total, forty-four respondents provided input to this assessment report.

Who responded?

- 🚩 delegates to the conference in Nairobi, **Kenya: 14 replies** (1 organiser, 1 speaker, 6 industry representatives, 6 government representatives)
- 🚩 delegates to the conference in Goa, **India: 2 replies**, industry representatives
- 🚩 delegates to the conference in Sao Paolo, **Brazil: 6 replies** (2 government representatives, 1 University, 3 industry representatives)
- 🚩 **15 replies from EU** based people (1 author, 1 University, 2 government representatives, 4 speakers, 7 industry representatives)
- 🚩 stakeholders from **USA, Canada, Nepal, Pacific: 7 replies** (1 industry rep, 3 government representatives, 3 authors)

The repartition of respondents was comparable with most of them coming from the feed industry (19 industry, 13 government bodies, 12 other). Most European stakeholders were aware that the workshop they attended was part of STDF project 56, as most of them were directly involved in the project. From the other workshops' participants however only few were aware thereof. This concludes that most of the real beneficiaries of the project, i.e. participants to the workshops, were not aware that the conference was part of the project.

Given the response rate, results should be assessed in this perspective and provide more a general tendency. Therefore no detailed conclusions are drawn as they would not appear to be representative. If details are provided, they refer to the African continent, representing most of the developing countries, and therefore most relevant within this exercise.

What follows is the overall appreciation by all respondents of the different evaluation criteria that finally draws the conclusion on the assessment of the project. The questionnaire itself, the overall results, the breakdown of replies per continent, and the breakdown per sector (government official GOV, private industry IND or other) are attached to this report in annex.

RELEVANCE

Overall the IFIF/FAO project – a series of workshops and the development of the Feed Manual – was assessed as the right answer to meet the needs of the feed industry at large.

The workshops organised by IFIF/FAO certainly added to a better understanding of the Codex Alimentarius Code of Practice for Good Animal Feeding, its implementation however has not yet materialised in the developing countries. In addition, most find the Feed Manual a relevant tool for the feed industry and most of those who assisted to workshops were positive about its usefulness.

EFFECTIVENESS

As to the question to what extent the project has effectively achieved what it had foreseen in the project description, many respondents were not able to reply as they had not seen the Feed Manual. Overall the project had been effective (positive to moderate appreciation) as the link between enhancing feed safety and ensuring safety of food for human consumption is obvious. The worldwide participation of the feed industry was also recognised as an important factor for this achievement. However this criterion triggered the most diverse replies. Especially from the African continent the following factors were identified as influencing the (non)achievement of the project objectives: lack of or limited education, interest and/or information on the part of manufacturers and producers on the importance of feed and food safety, inadequate funds by feed manufacturers to enable implementation of the Code, high prices of good quality inputs, poor prices for animal products leading to poor implementation of the Code, no mechanism put in place to link workshop participants with policy makers in their respective countries, no training programmes took place in the country as initially planned in the FAO programme. These comments triggered the following other tools to have been more effective: involvement of government policy makers at a higher level through meetings and encourage government to establish units of feed standards, assist and promote establishment of feed producers and manufacturers' associations and train-the-trainer programmes, use of web-instruments for communication, and stakeholder consultation. Others mentioned that the Feed Manual provides the basic elements but that further work needs to be done to ensure the Code implementation: in some countries or associations outside consultancy might be necessary to assist with development of standards and strategies.

EFFICIENCY

Only stakeholders involved in the organisation of workshops and the development of the Feed Manual were invited to answer to this component. The majority of the respondents feel that the needs of feed producers (both farmers and industry) are adequately taken into account and that the outputs had been delivered in accordance with the IFIF/FAO project (on time and within the budget). Some other respondents, not involved in the project itself, however indicated that efficiency was not obtained for all the branches of the feed industry.

The IFIF/FAO project was assessed to be a cost-effective contribution to addressing the needs of the feed industry but not of that of the smallholder farmers who produce complete feed.

IMPACT

The effect of the outcome of the IFIF/FAO project (the Feed Manual as well as the knowledge-sharing at workshops) on the feed industry was overall assessed as positive, in particular by the industry.

For those who had seen the Feed Manual its use and/or the results of the workshops will have a positive impact on the quality of feed production. The user-friendliness of the Feed Manual was appreciated and overall respondents would use it to implement the Codex Code. It was however difficult for most to assess whether the project has contributed to a higher level of objectives such as a measurable impact on market access, improved domestic, and where applicable regional, SPS situations and/or poverty reductions, mainly because of the fact that the implementation phase had not yet started. Most respondents however assessed that the potential to have these benefits in the future was there. In the case of Brazil a regional Feed Association is being set up, and a national (tailor-made) Sindrões GMP manual already exists. They consequently see the use of the IFIF/FAO manual as beneficial for countries in the stage of GMP implementation.

The tools used in this project were also seen as the most effective ones to achieve this impact. However the following suggestions were made, mainly by African delegates: the need to take into account the needs of smallholder farmers and small manufacturers, participants to the workshop could have been better selected (policy makers, feed manufacturers) because they had no power to enforce implementation of the Code, therefore the positive impact was lost. Also the certification bodies, who play an important role in this whole process, were identified as an alternative tool with a larger impact on the feed industry.

SUSTAINABILITY

In the overall assessment, it is essential to know to which extent the results of this project will continue after funding has ended. This question was very difficult to reply by most respondents, especially in view of the non-availability of the Feed Manual. Also it was recognised that benefits would cease if no new system was put in place in countries where such system did not yet exist (lack of enforcement). However more feed associations and feed companies are looking to joining IFIF because of the IFIF/FAO collaboration. It provides for a platform for open communication of problems and opportunities for application of the Manual on a global level.

In most African countries, the feed industry does not have the capacity to sustain the results of the IFIF/FAO project due to lack of resources or because training programmes are still to be set up, whereas this is not the case in countries/regions where feed associations already exist.

The major factors which may undermine the sustainability of the IFIF/FAO project are the feed industry which is too fragmented or small-scale, the underperformance of existing or non-existence of any feed associations, lack of power of governments to verify the Code implementation, absence of laboratory facilities to test feed quality, lack of human resources and lack of motivation. In conclusion the sustainability will highly depend on the availability of basic structural capacity.

In case no national feed industry association exists, as a result of participating in the IFIF/FAO project, some African countries reflect on setting these up and would perceive this as a major benefit of the project.

LESSONS LEARNT

The future steps to be taken based on the experience gained in this project almost all referred to the need and necessity to continue the initial efforts made in this project. As follow-up actions, the need for tailor-made training activities, for more involvement of local/regional stakeholders and for the involvement of government bodies was highlighted. Also the setting up and training of national feed associations should be ensured, an effect which is already materialising (see above). In this way global harmonisation of proposals and standards is achieved. The IFIF/FAO partnership was recognised as paramount as the feed industry can supply the financial means to support this collaboration beyond limited FAO funds.

The majority of respondents thinks that the current project design and implementation were the best approach to implement the Codex Code.

The overall lessons to be learnt from the outcome of the IFIF/FAO project, which may be of importance to the donor community (that is, those organisations and countries that provide funding) and which follow from the African participants, are the following: to develop training programmes and promote introduction of the concept during education, develop and introduce the principles in a regulatory policy framework, provide laboratory capacity, get involved in developing the necessary capacity to implement the Code, involve immediate stakeholders, organise more workshops, provide sufficient training, and implement quality systems further upstream.

Several countries (in particular their feed associations) have been actively involved in the organisation of the conferences and in taking forward the STDF project. These included Brazil, China and the United States of America. Results have shown that this initiative has brought people together and increased mutual understanding and appreciation of concerns. Increasing these efforts further with more stakeholders involved, would give an additional boost to this.

CONCLUSIONS AND RECOMMENDATIONS

❖ CONCLUSIONS

In conclusion this project assessment revealed that the project **only partially achieved the objectives set out in the project document**. This is mainly due to the fact that the Feed Manual is still not finalised (nor translated in the five languages), and that there is insufficient evidence that the conferences at which workshops were held were part of the project. Also, the training programmes, which were part of the objectives, have not materialised. Therefore it can be concluded that the project management itself has been rather poor and that there is little to no transparency in the financial or technical management of the project.

However, from the replies to the questionnaire and the discussion during the IFIF visit, it is clear that the substance of the conferences was about the project objectives and that the message was passed at these occasions (even if participants were not aware that it was part of this project). The conferences together with the Feed manual further the idea of promoting an internationally harmonised approach towards the implementation of the Codex Code. This is certainly positive but as the Feed Manual, the essential tool to achieve this, is still not available the positive impact it may have on the Feed Industry at large is not yet fully visible and hence nor the positive effects on overall food safety. Notwithstanding this, it is generally recognised that once the Feed Manual will be available, these goals may be achieved upon condition that appropriate follow-up is ensured and the necessary adaptations to the Manual are made. The initiative taken by IFIF/FAO to promote a better understanding and implementation of the Codex Code is without any doubt very good as are the spin-off effects. It is only regrettable that the concrete outputs are not yet fully available, which leads to the above conclusion on the project itself.

The project has **not yet achieved any of the higher level objectives of the Facility**, e.g. a measurable impact on market access, an improved domestic, and where applicable regional, SPS situation, and poverty reduction **so far** because of the reasons mentioned above. However, its biggest achievements are the enhanced awareness/consciousness of the Feed Industry of the importance to cooperate internationally as well as the recognition of the need for international uniform guidelines. Taken into account that not so many existing (inter)national Feed Associations have replied, this conclusion might be somehow biased. Nevertheless, both government and industry representatives amongst the respondents share this view. Moreover it is important to emphasise that this particular partnership (IFIF-FAO) (private-public if you like) has brought together several stakeholders that otherwise would not meet and has a synergetic effect. It is certainly an interesting development in order to proceed pragmatically and reach also stakeholders that otherwise would not be involved.

Taking into account however that the STDF was not yet fully up and running at the time this project was agreed upon, **the benefits of the project outweigh the minor points. Upon condition that follow-up actions will be undertaken, then the project will certainly have achieved the goals of STDF.**

The **key lessons** for the benefit of both recipients and donors and for future STDF programme development are identified as follows.

1/ for recipients and donors

- beneficiaries need to be made aware of the project they are involved in,
- involvement of all stakeholders in essential (at all levels),
- more focused programmes for specific target groups are necessary

2/ for future STDF programme development

- as IFIF was not aware that the project would be assessed, it had not paid any attention to keeping evidence to substantiate project actions.
- there was insufficient detail in the Terms of Reference (ToR) on how the project would be implemented. E.g. no mention was made under which format the workshops or training programmes would be held with the consequence that there is insufficient basis on which ground to assess them.
- as the ToR remained rather general it was hard to identify who were the developing countries' beneficiaries
- the financial breakdown in the ToR was too general to judge its relevance

The key lessons learnt from STDF 56 are:

- ⇒ that public groups can work with industry to achieve a pre-defined objective
- ⇒ bringing together the resources and efforts of the IFIF and FAO can be extremely beneficial in addressing issues such as feed safety
- ⇒ that the quality/safety of raw materials is a prerequisite to safe finished feed
- ⇒ that the feed industry must have support – particularly in DC - to identify/analyse what is in raw materials being put forward for use before they are processed into feed. Commercial practices in developed countries automatically takes care of this aspect of feed safety (although lessons are still being learnt), but this is often not the case in emerging and developing economies.
- ⇒ that there is global recognition that harmonised guidelines on how to implement the Codex Code are very beneficial, both to the development of the feed industry in DC as to trade potential.

❖ RECOMMENDATIONS

For the STDF Secretariat:

- The STDF Secretariat needs to indicate clearly at the onset of the project that an assessment will take place and how this will be done. This will give the burden of proof to the contractor to keep all necessary evidence of project actions.
- a more in-depth assessment of the project proposal needs to be made before a project is approved (including existing data, wider stakeholder consultation if feasible, etc..) Therefore more detailed input from the applicant on the project proposal would be necessary (e.g. in terms of DC beneficiaries, financial breakdown, what is concretely done with the budget, timeframe, etc...). The current project achieves one of the values added by STDF once the project will be finalised. However the timeframe has not been respected and this leads to the non-achievement of the project outputs *sensu stricto*.

For the STDF 56 project:

Although the project has not fully achieved its objectives, it is generally recognised, both by the assessor and the respondents to the questionnaire, that follow-up action is paramount to obtain its goals. It would be a pity and a waste of resources not to **finalise the Feed Manual** at this stage. The content needs to be fine-tuned, missing chapters need to be added and basic ones further completed, and international references need to be

adopted. Almost all of the respondents have highlighted their wish to receive a copy of the Feed Manual as they would surely use it.

Furthermore it is obvious from the reactions that the project has brought together several stakeholders and has triggered them to take action and come to a more internationally harmonised approach towards feed safety, the forerunner of food safety. This effect would benefit from being further elaborated through the **organisation of very tailor-made workshops and training programmes**. This would also trigger the further setting up of feed associations, both nationally and regionally.

Involvement of all stakeholders (both from the feed producer side, as from the feed regulatory sector) globally would even be more beneficial as feed safety procedures would get even more harmonised. Any action to promote this would be very beneficial.

It is clear that **smallholder farmers** producing feed on farm have not benefited from the project. In light of the objectives of the STDF however, it is recommended that this group is targeted in or at least closely involved in any follow-up action.

For FAO

If the FAO logo will appear on the Feed Manual it should be unambiguous in its presentation that the manual is fully independent of the continuation of the Codex TF. Such reference could be included in a disclaimer. Likewise FAO/CODEX should continue discussions in the TF eventually without being impeded by this existing manual. It is clear that a lot of valuable information and tools as outlined in the manual will be recommended if any further work is to materialise, but this should not hamper TF discussions. The TF needs to proceed without any constraints. On the contrary, and as already indicated by IFIF, the Manual should be updated in light of any new developments in the Codex TF.

ACKNOWLEDGEMENTS

The author wishes to thank:

- Mr. Roger Gilbert and his staff for his valuable comments in improving the questionnaire, for his full cooperation during the visit and for providing the addressees of the questionnaire,
- The STDF Secretariat, in particular Ms. C. Besson, for circulating the questionnaire,
- Ms. C. Iffenecker for her excellent help in processing the replies to the questionnaire,
- And not least all respondents to the questionnaire for their time and valuable comments, which certainly contributed to the quality of this assessment.

ABBREVIATIONS

| | |
|-------------|---|
| Feed Manual | IFIF/FAO Feed manual or Manual of Good Practices for Animal Feeding |
| Codex code | Codex Alimentarius Code of good animal feeding practice |
| Codex TF | the ad hoc Intergovernmental Codex Task Force on animal feeding |
| FAO | Food and Agriculture Organisation |
| WTO | World Trade Organisation |
| STDF | Standards and Trade Development Facility |
| STDF 56 | the current project under evaluation: "Capacity building for the implementation of the Codex Alimentarius Code of Practice for Animal Feeding". |
| IFIF | International Feed Industry Federation |
| DC | Developing Countries |
| LDC | Least Developed Countries |

ANNEX TO THE REPORT

- questionnaire to stakeholders
- overall results of replies to the questionnaire
- breakdown per evaluation criterion (total, per category of respondents being government staff, industry staff or others, according to geographical distribution):
 - relevance
 - effectiveness
 - efficiency
 - impact
 - sustainability
 - lessons learnt

EVALUATION OF STDF PROJECT 56

CAPACITY BUILDING FOR THE IMPLEMENTATION OF THE CODEX ALIMENTARIUS CODE OF PRACTICE FOR ANIMAL FEEDING

QUESTIONNAIRE

Over the past two years, IFIF – together with FAO – have been conducting a number of workshops to draw to the attention of those making feed for food producing animals on the importance of feed and food safety as identified in the Codex Alimentarius Code of Good Animal Feeding Practice.

IFIF and FAO have also been developing a universally applicable Feed Manual, of which a draft version has been produced and reviewed by sectors of the compound feed sector.

To achieve the above IFIF has undertaken a project funded through the Standards and Trade Development Facility (STDF). The objective of this STDF project was to help ensure the safety of food for human consumption through the development and implementation of good animal feeding practice at the farm level and good manufacturing practices during the procurement, handling, storage, processing and distribution of animal feed and feed ingredients for food-producing animals. This was to be achieved through the production of a **Feed Manual, workshops**, and through subsequent national and regional **training programmes**.

If you have been involved in one of the workshops/training programs, or the development of the Feed Manual, either in an organisational capacity or as a participant (stakeholder), or in any other way familiar with the topic, we kindly invite you to complete this questionnaire and provide comments as you deem useful.

The questionnaire is set up with a majority of closed questions; however stakeholders are requested to provide additional comments as they see fit. Please delete the answer which is not applicable and return questionnaire by close of business **21 May** to the following e-mail addresses :

Isabelle.Rollier@ec.europa.eu (the report assessor)
STDFSecretariat@wto.org (STDF Secretariat)

YOUR NAME:

ORGANISATION:

COUNTRY/ CONTINENT:

E-MAIL ADDRESS:

CONTACT DETAILS:

ROLE IN THE PROJECT

Did you help draft the Feed Manual? YES

NO

Did you attend the workshop:

- in Cairo, Egypt, September 11-13, 2006
- in Nairobi, Kenya, June 26-27, 2006
- in Beijing, China, December 15-16, 2005
- in Goa, India, September 16, 2005
- in Sao Paolo, Brazil, July 14-16, 2005
- other:

WERE YOU AN:

- Organiser
- Delegate
- Speaker
- Other

DID YOU ATTEND AS:

- An industry representative
- a Government representative
- Other

❖ Were you aware that the workshop you attended was part of the STDF 56 project, funded by the STDF?

YES

NO

RELEVANCE

This part needs to answer the question how relevant the IFIF/FAO project is to your organisation or business.

Key question

- ❖ In your opinion was the IFIF/FAO project – a series of workshops and the development of the Feed Manual - the right answer to meet the needs of the feed industry at large?

YES MODERATE NO

The Codex Code

- ❖ Have the workshops organised by IFIF/FAO added to a better understanding of the Codex Alimentarius Code of Practice for Good Animal Feeding?

YES MODERATE NO

- ❖ Have the workshops organised by IFIF/FAO helped your organisation to a better implementation of the Codex Alimentarius Code of Practice for Good Animal Feeding?

YES MODERATE NO

The Feed Manual

- ❖ Is the Feed Manual, once finalised and made available, a relevant tool for the feed industry?

YES MODERATE NO

- ❖ Does the Feed Manual (in case you have seen the draft version) contain all information that you need to implement the Codex Alimentarius Code of Practice for Good Animal Feeding?

YES MODERATE NO

The workshops/Conferences

- ❖ Did the workshop or conferences you attended provide the right answers about the Feed Manual and the implementation of the Codex Code of Practice for Good Animal Feeding?

YES MODERATE NO

EFFECTIVENESS

This question relates to the issue to what extent the project has effectively achieved what it had foreseen in the project description.

- ❖ Were the objectives (that is, ensuring safety of food for human consumption) achieved/ are likely to be achieved?

YES

MODERATE

NO

- ❖ What were the major factors influencing the achievement or non-achievement of the objectives?

- ❖ In your opinion, would other tools have been more useful to achieve these objectives? If yes, which ones.

YES

MODERATE

NO

EFFICIENCY

Only stakeholders involved in the organisation of workshops and the development of the Feed Manual need answer the following questions on efficiency

- ❖ In setting up the IFIF/FAO project do you feel the needs of feed producers (both farmers and industry) are adequately taken into account?
- ❖ Were the activities and outputs delivered in accordance with the IFIF/FAO project (on time and within the budget)?
- ❖ What changes, if any, were made during the IFIF/FAO project's implementation?
- ❖ Was the IFIF/FAO project a cost-effective contribution to addressing the needs of the feed industry?
- ❖ Was the IFIF/FAO project a cost-effective contribution to addressing the needs of the smallholder farmers who produce complete feed?

IMPACT

This question addresses the effect of the outcome of the IFIF/FAO project (the Feed Manual as well as the knowledge-sharing at workshops) on the feed industry.

- ❖ Will the use of the Feed Manual and/or the results of the workshops you attended have a positive impact on the quality of feed production in your farm, company, country?

YES MODERATE NO

- ❖ If you have seen a draft version of the Feed Manual, do you feel it is sufficiently user-friendly to use in an industry or farm environment?

YES MODERATE NO

- ❖ If you have seen a draft version of the Feed Manual, will you use it to implement the Codex Alimentarius Code of Practice for Good Animal Feeding?

YES MODERATE NO

- ❖ Do you think the IFIF/FAO project has contributed to a higher level of objectives such as a measurable impact on market access, improved domestic, and where applicable regional, SPS situations and/or poverty reductions?

YES MODERATE NO

- ❖ What real difference has the project made or is likely to have made on the final beneficiaries i.e. the feed producers?

- ❖ In your opinion, would any other 'tools' have had a larger impact on the feed companies and on-farm feed mixers, if yes, what would they be?

YES MODERATE NO

SUSTAINABILITY

This question refers to the extent to which the results of this project will continue after funding has ended.

- ❖ In your opinion to what extent will the benefits achieved through the IFIF/FAO project continue after funding has ceased?

- ❖ Does the feed industry in your country have the capacity to sustain the results of the IFIF/FAO project?

YES MODERATE NO

- ❖ What are the major factors which may undermine the sustainability of the IFIF/FAO project?

- ❖ Do you intend to continue working on implementing the Codex Code of Good Animal Feeding Practice using the Feed Manual as a reference document?

YES MODERATE NO

- ❖ Do you or does your country intend to set up a national feed industry association – if one does not currently exist – as a result of participating in the IFIF/FAO project?

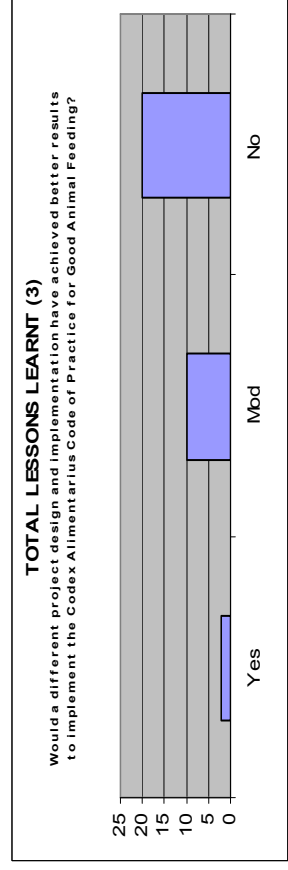
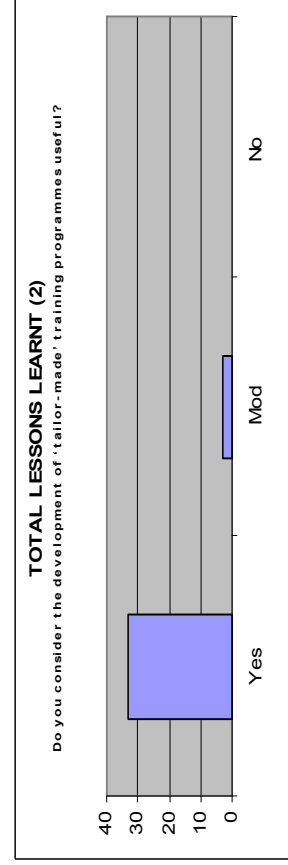
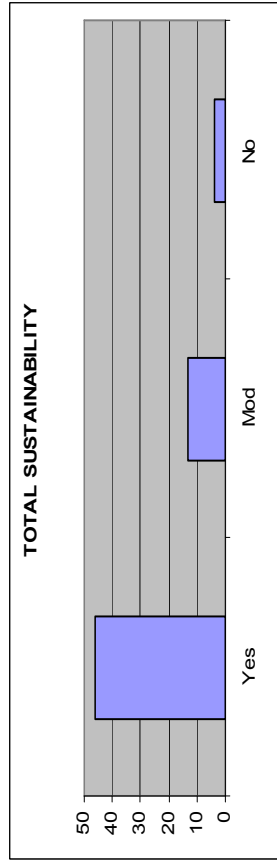
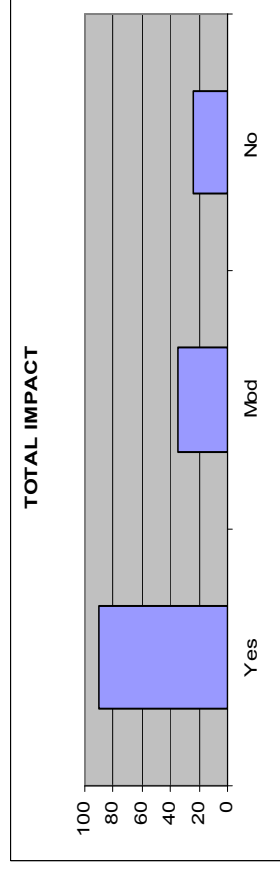
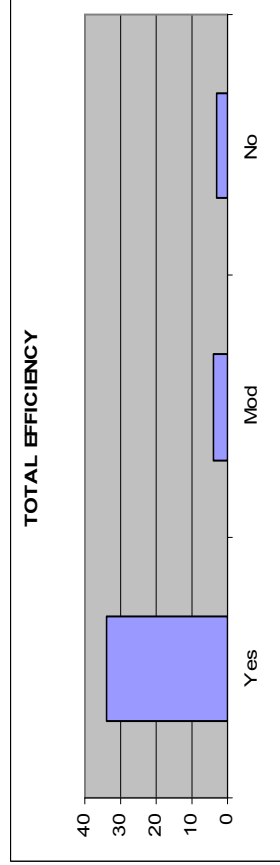
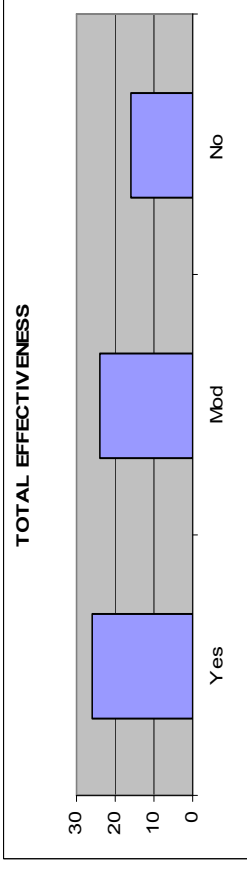
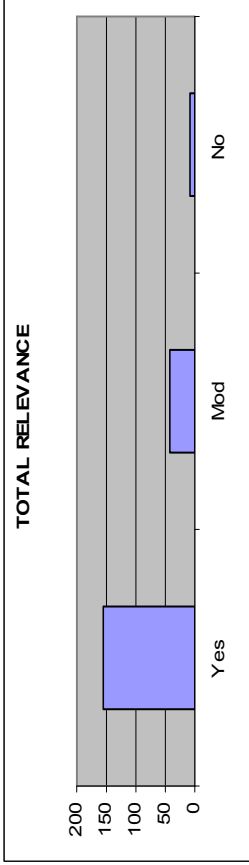
YES MODERATE NO

LESSONS LEARNT

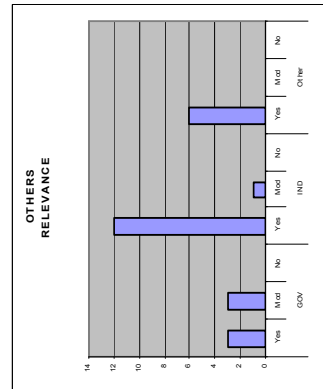
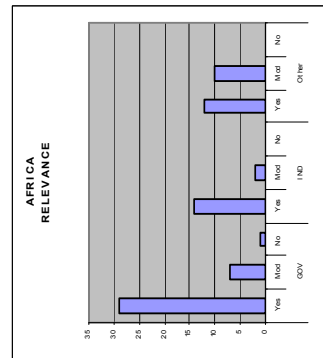
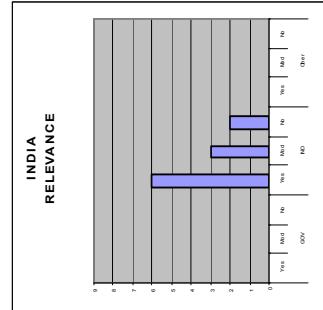
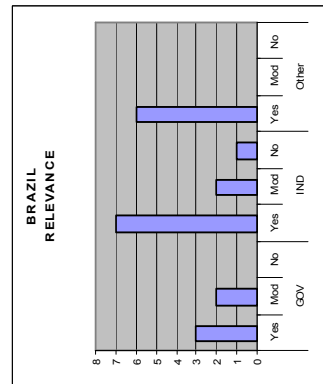
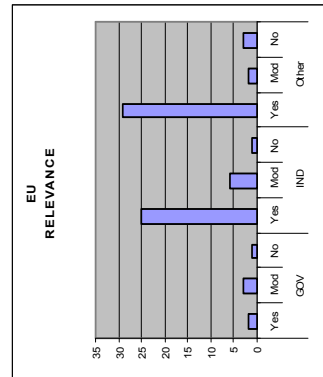
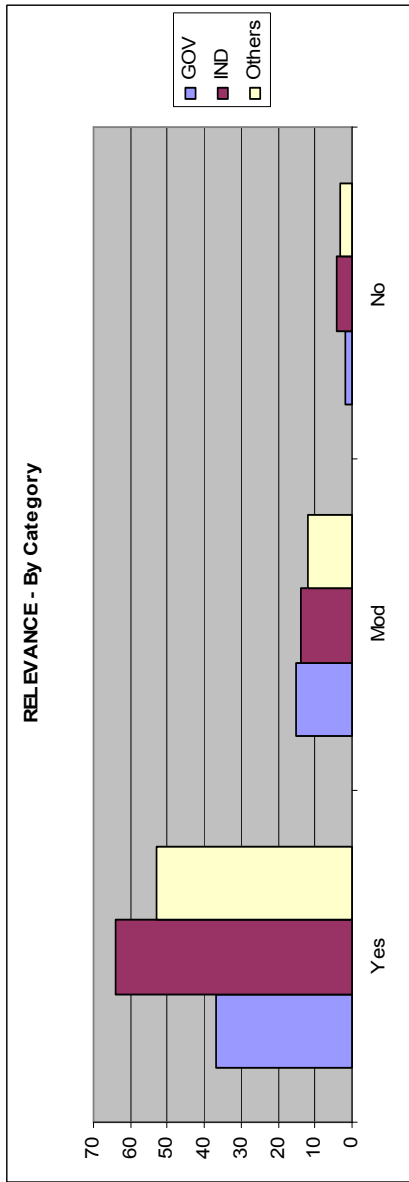
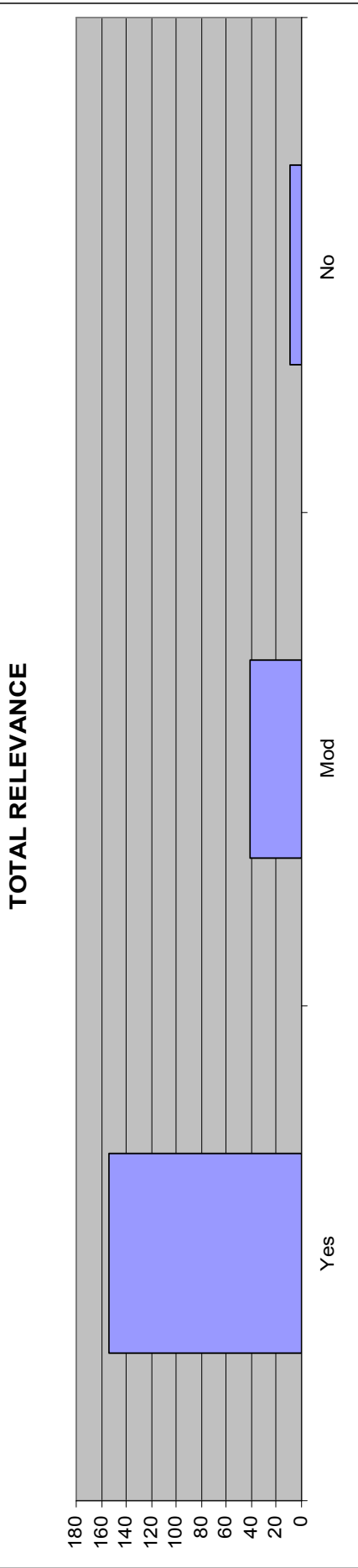
This heading refers to the future steps to be taken based on the experience gained in this project.

- ❖ In your opinion, what follow-up actions should be envisaged following on from the workshops and the production of the Feed Manual?

OVERALL RESULTS OF THE REPLIES TO THE QUESTIONNAIRE

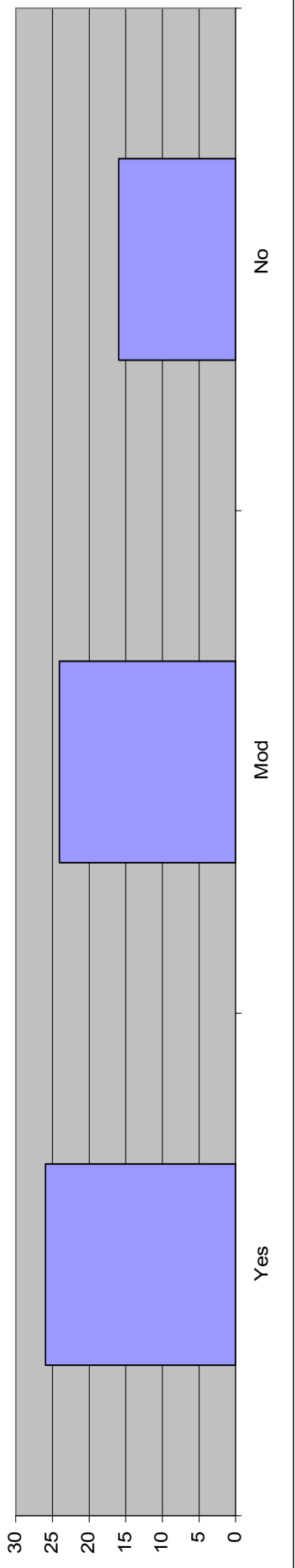


RELEVANCE

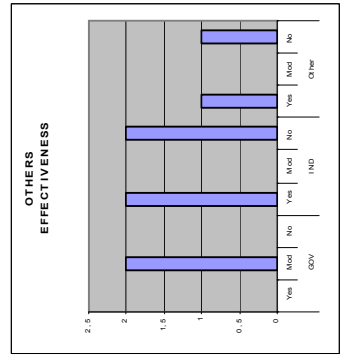
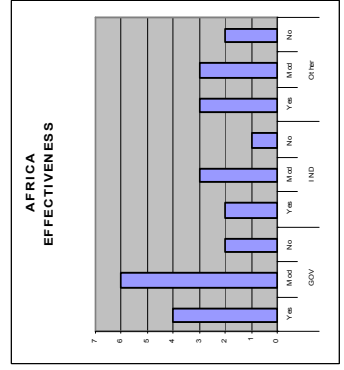
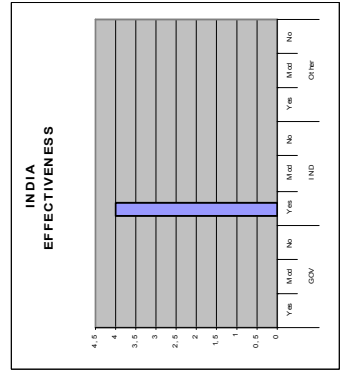
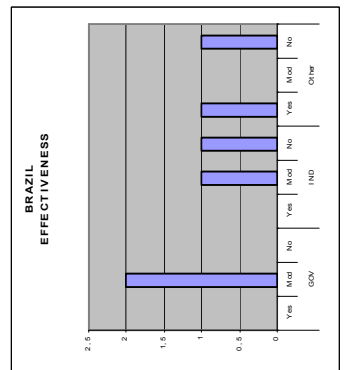
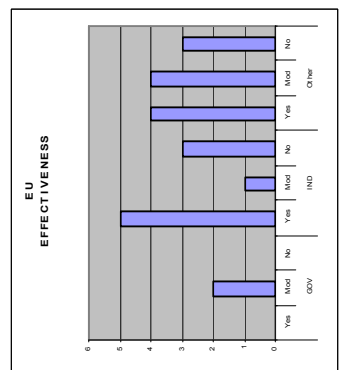
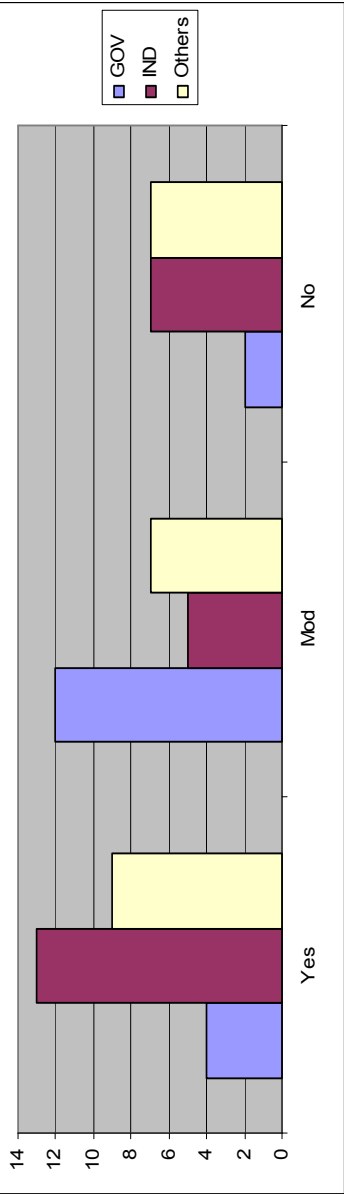


EFFECTIVENESS

TOTAL EFFECTIVENESS

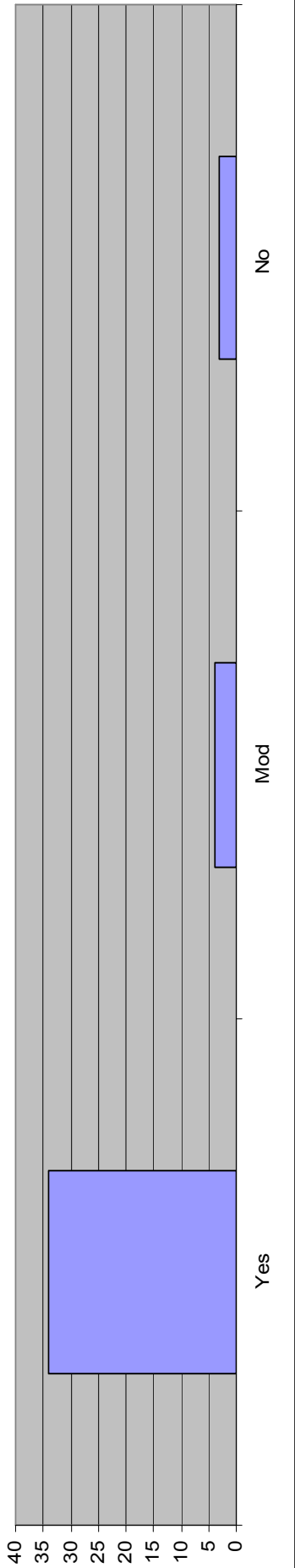


EFFECTIVENESS - By Category

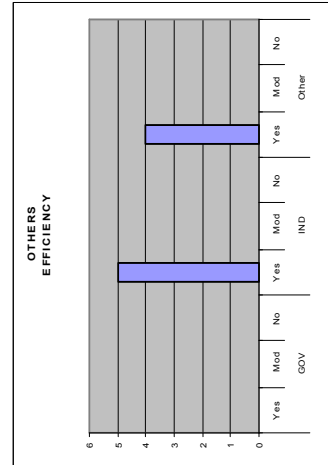
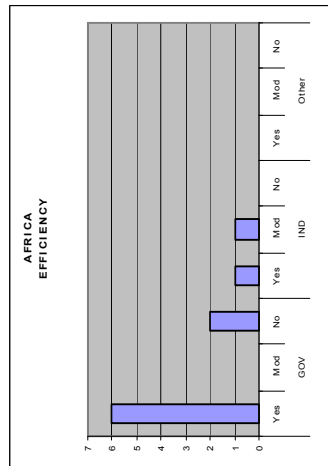
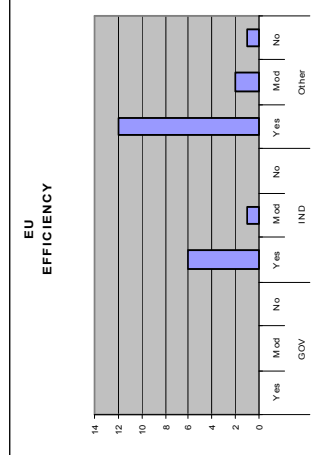
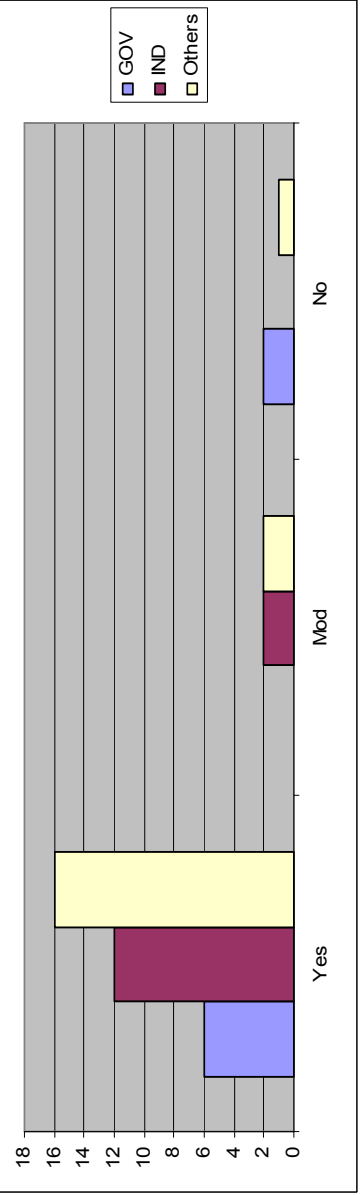


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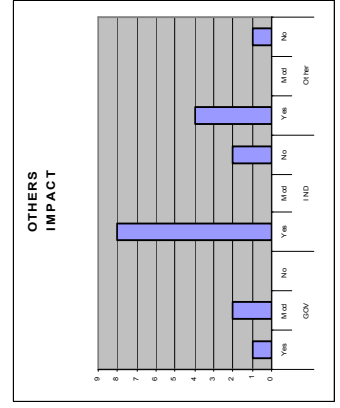
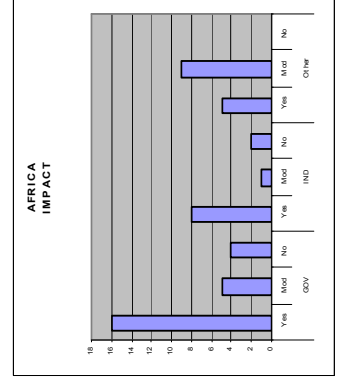
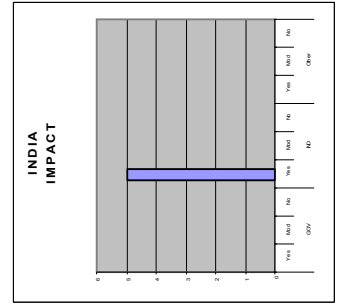
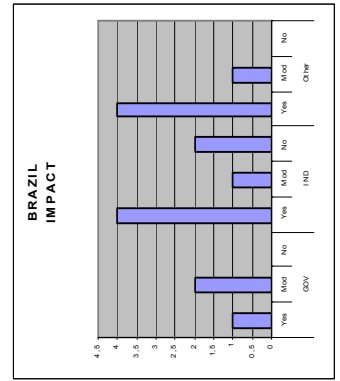
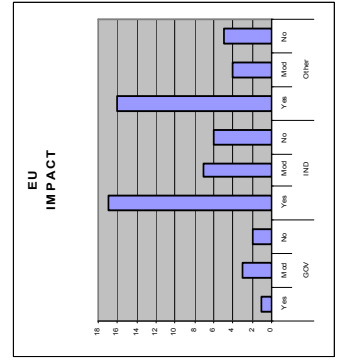
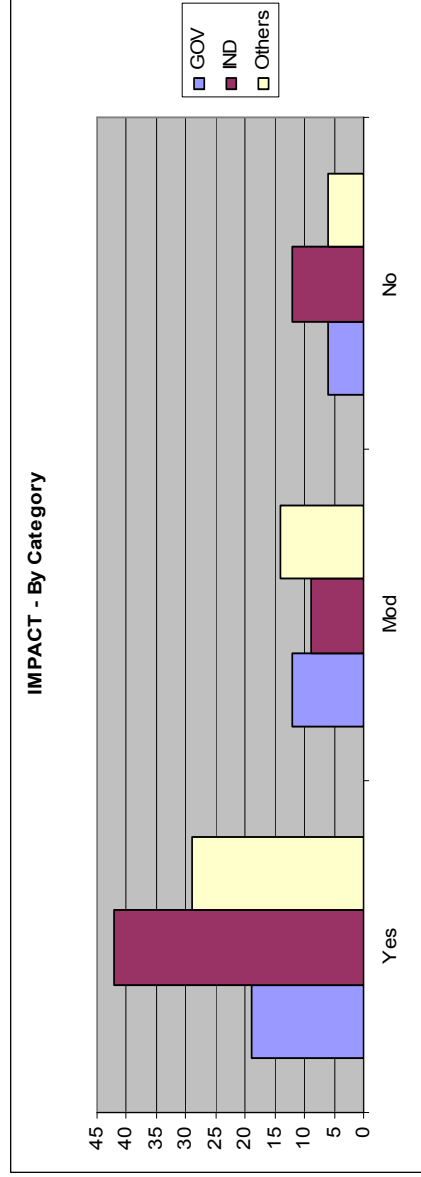
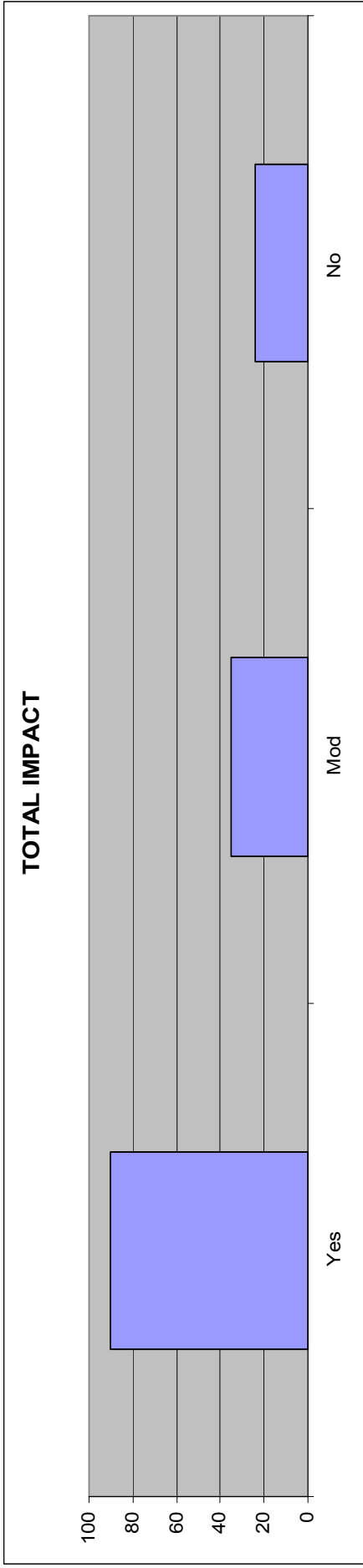
TOTAL EFFICIENCY



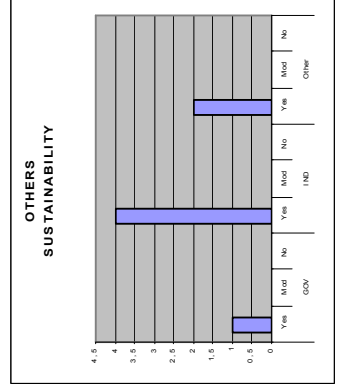
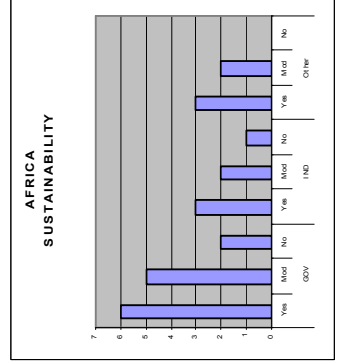
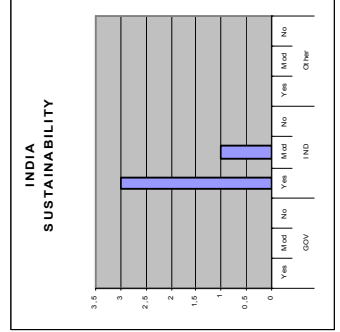
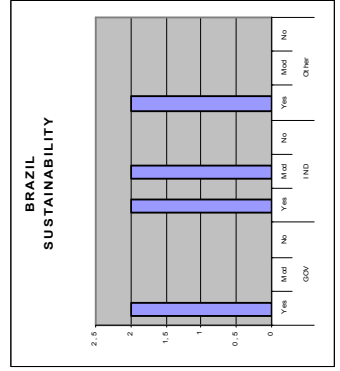
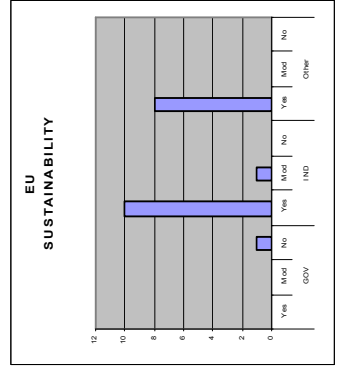
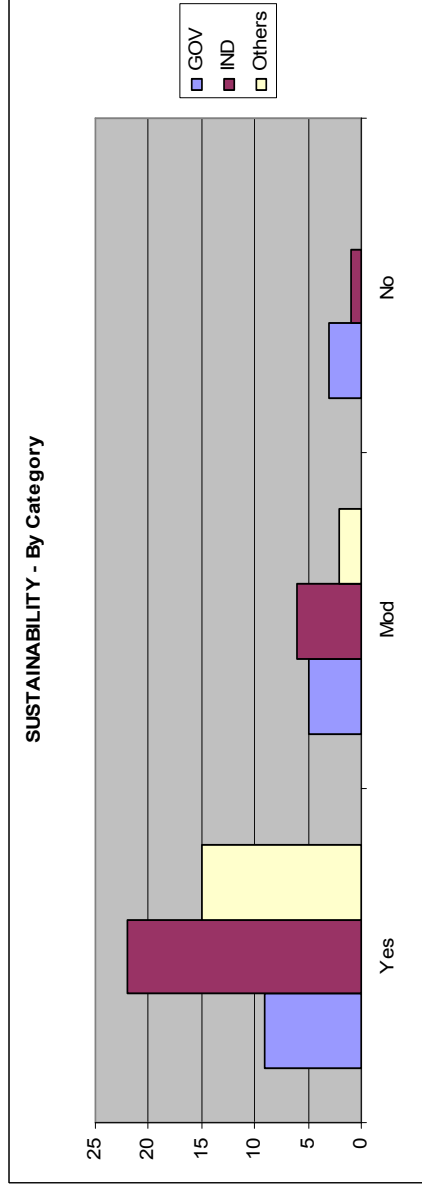
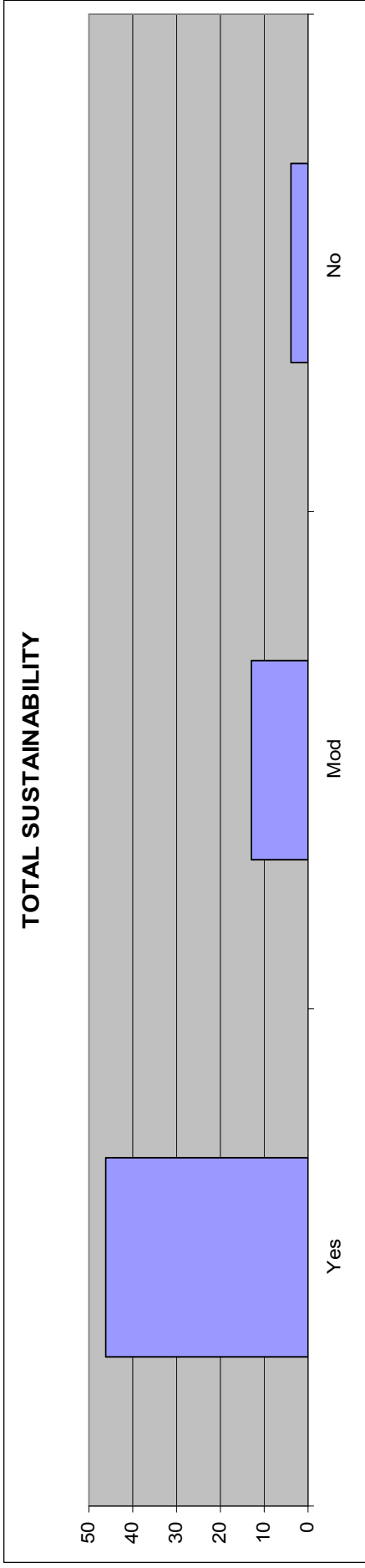
EFFICIENCY - By Category



IMPACT



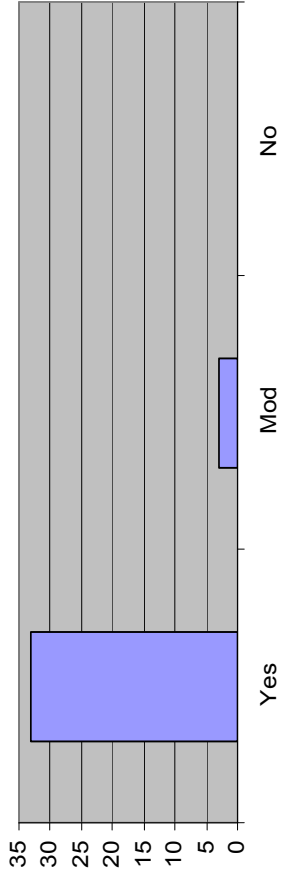
SUSTAINABILITY



LESSONS LEARNT

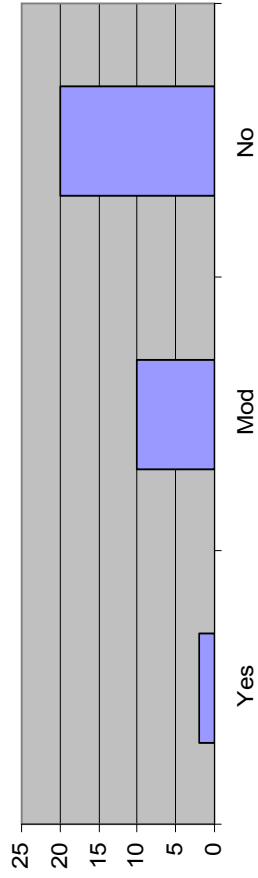
TOTAL LESSONS LEARNT (2)

Do you consider the development of 'tailor-made' training programmes useful?

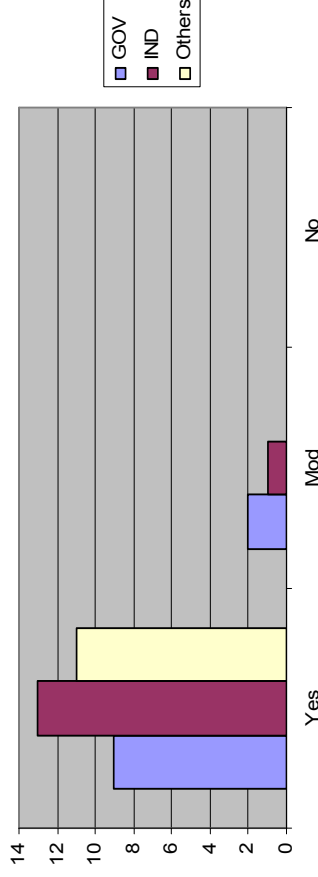


TOTAL LESSONS LEARNT (3)

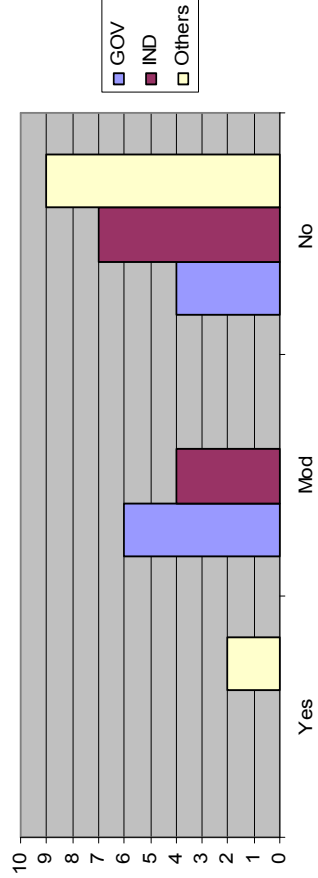
Would a different project design and implementation have achieved better results to implement the Codex Alimentarius Code of Practice for Good Animal Feeding?



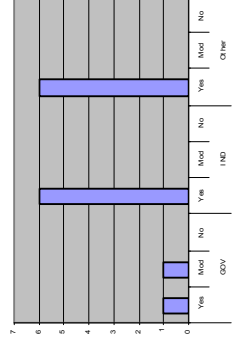
LESSONS LEARNT (2) - By Category



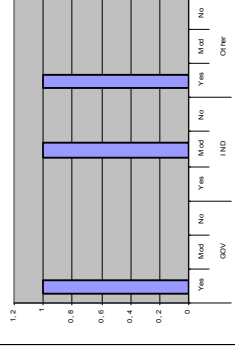
LESSONS LEARNT (3) - By Category



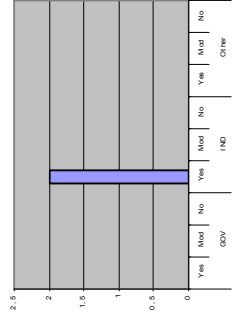
EU LESSONS LEARNT (2)



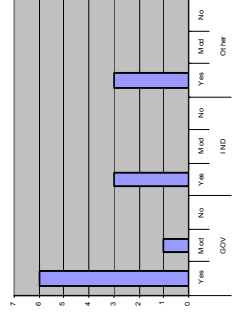
BRAZIL LESSONS LEARNT (2)



INDIA LESSONS LEARNT (2)



AFRICA LESSONS LEARNT (2)



OTHERS LESSONS LEARNT (2)

