



Montenegro  
Food Safety Administration, Veterinary  
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## **Recommendations on the monitoring of inorganic arsenic in animal feed**

The Security Law of food (Official Gazette of the Republic of Montenegro, No. 57/2015) the conditions are prescribed for security food and food for animals , obligations and responsibilities business entities with food and with food for animals , including and traditional products , such as and other questions from importance for security food and food for animals , works protection life and health people , life environment , consumers and efficient functioning markets .

Further , this by law It is defined **that feed or feedingstuff is any substance or product, including feed additives, whether processed , partially processed or unprocessed , and intended for oral nutrition animal .**

Some expressions used in this law they have next meanings :

**Risk** is an opportunity. emergence harmful influence on health and weight that one influence , which performance as consequence and dangers .

**Assessment Risk assessment** is a scientific based process consisting of from four steps : identification hazards , description ( characterization ) of hazards , assessment exposure and description ( characterization ) of risk ;

**Management risk management** is a process comparisons politics and measure , separate from assessment risks which are compared possibilities dealings with with risk , with consultations with interested the parties , taking into account and assessment risks and others legitimate factors and according to need , choice and implementation appropriate preventive and control measure ;

**Hazard** is biological , chemical or physical food agent or feed for animals or condition food or food for animals which can cause harmful action on health ;

**Official control (official control)** is each shape controls which funerals competent organs , works determination compliance with food regulations and feed for animals , health animal and plants and benefits animal ;

**Non-conformity** is a failure to fulfill prescribed request for food or food for animals , health and welfare animal ;

**Taking samples for laboratory examination** is taking food or food for animals , in order to be laboratory by examination confirmed compliance with requirements established food regulations and feed for animals and to health animal .



***With this by law prescribed are general and special principles security***

**General Principle** - Security food and food for animals should be based on providing high level protection life and health people , protection interest consumer protection health and benefits animals , health plants and protection life environment and free movements food and food for animals , produced and placed on market .

***Principle analyses risks***

***Analysis risk analysis*** is a process consisting of from estimates risk management at risk and risk communication , and it is done for achieving high level protection life and health people , except in cases when it's not appropriately circumstances or nature measures .

***Assessment risks*** is based on available scientific evidence and is performed on independent , objective and transparent way. Estimation risks , they can perform scientific research institutions for security food which fulfill conditions regarding professional frame and which authority Ministry . If they do not exist in Montenegro scientific research institutions which fulfill conditions Ministry can authorize specialized institution countries members European union for assessment food risks and feed for animals .

**Precaution ( Article 14)** - Safety food and food for animals should be based on principle reliable , scientific established and efficient implementation procedures and undertaking measure in the field security food and food for animals , appropriate requirements protection life and health people , health and benefits animals , health plants and protection alive environment .

If on basis available information establish possible harmful action food or food for animals on health people and animal , if there are scientific doubts , temporary measures are taken measures management at risk necessary for security high level protection health , until obtaining more reliable scientific information necessary for comprehensive assessment risks .

Measures from paragraph 1 of this member must to be appropriate risk , they must not to limit custom trade larger from necessary for provision efficient protection health people and animal , leading technical account and economic feasibility and justified reasons , and are reviewed in a reasonable temporal within the period depending from types established risks and types scientific data necessary for clarification scientific doubt and implementation comprehensive estimates risks .



Below

**Recommendations European commissions from May 20, 2022.  
about tracking presence inorganic arsenic in food for animals  
(2022/C 206/01)**

EUROPEAN COMMISSION,

taking into account The Treaty on the Functioning of the European Union,  
especially its Article 292,

whereas:

- (1) Inorganic and organic shapes arsenic they differ significantly by toxicity ,  
and organic connections arsenic they have very low toxic potential.  
Therefore, the potential adverse effects of arsenic on animal (and human)  
health are determined based on the inorganic fraction in a given feed (or  
food). In feeds containing fish, other aquatic animals and products thereof,  
and algae and products thereof, predominantly organic forms of arsenic are  
present. Data solely on total arsenic in such feeds are difficult to interpret  
in terms of the potential for causing adverse effects.
- (2) Directive 2002/32/EC of the European Parliament and of the Council sets  
maximum levels for arsenic in a number of products intended for animal  
feed. The maximum levels refer to total arsenic because, when setting the  
maximum levels for arsenic in animal feed, no routine method was  
available for the separate analysis of inorganic arsenic, so only the level of  
total arsenic could be routinely analysed.
- (3) The EU Reference Laboratory for Metals and Nitrogen Compounds  
confirmed that routine methods are available for the analysis of inorganic  
arsenic in marine, animal and plant-based feed, but not in mineral feed  
matrices. However, in mineral feed, arsenic is present in inorganic form  
and therefore the determination of total arsenic in such feed matrices is a  
good estimate of the concentration of inorganic arsenic.
- (4) Only limited data on the presence of inorganic arsenic in animal feed are  
available in the database of the European Food Safety Authority (EFSA).
- (5) It is therefore appropriate to monitor the presence of inorganic arsenic in  
feed throughout the Union before considering the establishment of  
maximum levels for inorganic arsenic in certain feed or any other risk  
management measures necessary to ensure a high level of protection of  
animal and human health.

IT MADE THIS RECOMMENDATION:

1. Member States should, with the active participation of subjects in the  
animal feed business, monitor the presence of inorganic arsenic in animal

feed. It is recommended to determine the total arsenic content in the same samples in order to determine the ratio between inorganic arsenic and total arsenic.

2. In particular , it is necessary to take samples of the following nutrients and fodder mixtures:
  - (a) flour obtained from grass , dried alfalfa and dried clover;
  - (b) dried (sugar) beet pulp and dried (sugar) beet pulp with added molasses;
  - (c) palm kernel cake;
  - (d) fish, other aquatic animals and products derived therefrom;
  - (e) seaweed meal and feed obtained from the processing of seaweed;
  - (f) compound feed containing fish, other aquatic animals and products derived therefrom and/or seaweed meal and feed derived from seaweed processing.
3. In order to ensure the representativeness of the samples in the batch, Member States should follow the sampling procedure laid down in Commission Regulation (EC) No 152/2009 .
4. Countries members should ensure that EFSA regularly deliver analytical results , and by 30 June 2023 at the latest, in the EFSA data submission format in accordance with the requirements of the EFSA Guidelines for standard description sample (SSD2) for food and food for animals as and her/his additional special requirements for reporting .

This Recommendation transposes Recommendation (EC) No 2022/C 206/01 of the European Parliament and of the Council of 20 May 2022 on the monitoring of presence inorganic arsenic in food for animals / Recommendations european commission of 20 May 2022 on monitoring the presence of inorganic arsenic in feed Done in Brussels on May 20, 2022. i given briefly display national legal framework in relation on security food for animals and official food control for animals

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