

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

Discussion Paper

Revision of the ACAF Review of On-Farm Feeding Practices

Action required:

The Committee is asked to:

- **note the contents of this paper; and**
- **identify whether any areas of the document that require further consideration, or if there are any gaps in the document and steps that could be taken to address these.**

**Secretariat
June 2015**

ACAF Paper on review of the Report of on-farm feeding practices

Purpose

1. This paper provides information on the developments to review and update ACAF's report on the review of on-farming feeding practices that was published in 2003. Additionally, the paper seeks the views of the Committee on areas or gaps in the review document (see Annex) that require further consideration or investigation.

Background

2. At its 26 February 2014 meeting, Members agreed that the Committee should review and update the report. The Committee agreed that the document was important, and that it should provide consistent guidance and reflect current trends which are currently not included.
3. A sub-group comprising Ms Booth (Chairperson), Mr Brigstocke, Mrs Young, Dr Peers, Dr Riley and Mr Snow was tasked to take this work forward.
4. At the Committee's 2 February 2015 meeting the Chairman of the sub-group reported that much progress had been made in reviewing and updating the report.

Discussion

5. The current revised draft document is attached at the Annex. The sub-group's approach, agreed main changes and new additions are described below.
6. The sub-group held meetings in June and September 2014. At the first meeting, the sub-group scoped out what it intended to consider as part of the review, and what the final report would look like. To this end the sub-group agreed that the revised guidance should provide helpful information about food safety as well as feed safety. The guidance should consist of an executive summary, a one page list of recommendations, and an introduction outlining the background and charting progress since 2003. The document should outline the levels of hazards and minimise risks. There should also be a glossary of terms, an annex outlining the relevant legislation and an annex referring the reader to various related links. There should also be reference to

guidance from the National Farmers' Union, the Agriculture Industries Confederation and Scottish guides on grain storage. Defra and colleagues from devolved administrations should be invited to update sections of particular interest to them.

7. At its meeting held in September 2014, the sub-group reviewed an initial document agreeing that :

- the scope of the document should relate to food producing animals, including fish. However, although Regulation 183/2005 covers horses, rabbits and zoo animals, etc., the group agreed these were outside the scope of the document as other organisations covered these animals in documents that they published. The group also agreed that animals used in sport and recreation would not be covered in the document;
- other guidance documents produced by trade organisations should be referenced as part of an annex to the revised document;
- on-farm incidents should be included in the document to demonstrate that despite sometimes heavy scrutiny of the sector, the level of incidences was decreasing;
- the target audience should be properly defined;
- the background should be shortened to explain the reason why the 2003 Report was produced and why the review is taking place;
- the scope should define which animals are included in the Report and should have a section on annual turnover (details can be provided by the Agricultural Industries Confederation, Defra and ADAS as necessary);
- there should be an overview section that provides a timeline for significant events that have occurred since the original Report was published in 2003;
- the document should also include a short section on retailer specifications;
- there should also be a section covering technical developments such as robotic milking and how these have helped to identify, understand and mitigate risks;
- the document should also address how earned recognition might help to reduce risk;
- evidence should also be provided on dietary requirements of animals and how digestive physiology and animal feed are related;
- environmental aspects including the impact of the greenhouse gas action plan should be discussed;
- there should also be a section outlining the timeline on BSE and how the issue is still having an impact on the feed sector, i.e. the ban on ruminant gelatine;
- the document should also note the issue of emerging risks and the increase of self-regulation by the industry working in tandem with enforcement authorities;

- other areas should also be considered for inclusion in the document such as keeping the integrity of feed handling equipment, medicated feeds, and inclusion of a table outlining animals, their feed types, the legislation covering these, relevant assurance schemes and the typical feeding ration.
8. Members suggested that the document could delineate between advice for monogastrics and that for ruminants. The document could also cover gaps that had been identified in the Committee's paper 'Review of Gaps in the Feed Chain: Summary of Findings and Conclusions'. Other areas considered in the document include the emergence of 'hobby farmers', those who farm at low volumes without much commercial gain; animal feed that is produced from former foodstuffs, and the production of feed for aquaculture. The document also makes mention of the scale of the feed industry in terms of turnover, percentage of tonnage of feed produced, percentage of membership to assurance schemes and the tonnage of feed that is imported.
9. Subsequent to the September meeting, the ACAF Secretariat has prepared a further version of the revised report (see annex). It should be noted that some final adjustments and additions are required before the report can be published. For ease of reference, new sections in the revised report have been highlighted in the Annex to this paper.

Conclusion

10. The Committee is asked to:
- note the contents of this paper; and
 - identify whether there are any areas of the document that require further consideration, or if there are any gaps in the document and steps that could be taken to address these.

ACAF Secretariat

June 2015