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DRAFT MINUTES OF THE SEVENTY-EIGHTH MEETING OF ACAF HELD ON 27 FEBRUARY 2019, HELD AT ETC VENUES, VICTORIA, LONDON, SW1 DRUMMOND GATE, WESTMINSTER LONDON, SW1V 2QQ

Present:

Chairman	Dr Ian Brown	
Members	Ms Angela Booth	Mr Geoff Brown
	Ms Ann Davison	Prof. Ian Givens
	Prof. Stephen Forsythe	Mr Peter Francis
	Prof. Wendy Harwood	Mrs Christine McAlinden
	Dr Tim Riley	Prof. Robert Smith
Secretariat	Mr Keith Millar (Secretary)	Food Standards Agency
	Dr Mark Bond	Food Standards Agency
	Miss Mandy Jumnoodoo	Food Standards Agency
Assessors	Ms Claire Moni	Food Standards Scotland
	Ms Barbora Adlerová	Food Standards Agency Wales
	Mr Stephen Wyllie	Defra
Officials	Mrs Cath Mulholland	Food Standards Agency
	Mrs Nina Dorian	Veterinary Medicines Directorate
	Mr Scott Reaney	APHA
Delegates	Mr Michael Bellingham	Pet Food Manufacturers Association
	Mrs Lana Morgan	Pet Food Manufacturers Association

1. Dr Brown welcomed everyone to the meeting.

2. Apologies for absence were received from Dr David Peers.

3. The Chairman advised Members that Ms Barbora Adlerová had replaced Elizabeth Hirst as the Wales Assessor. The Chairman thanked Elizabeth for her contribution to the Committee and wished her well in the future. He invited Barbora to introduce herself. Ms Adlerová, said that she had worked in the UK for 7 years and her previous role was in Defra.

4. The Chairman confirmed that colleagues in Northern Ireland are still considering who is best placed to fill the current NI Assessor role on ACAF.

Agenda Item 1 - Declaration of Members' interests

5. Professor Forsythe declared that he had become an external advisor for the Centre for Food Stellenbosch South Africa. This was set up following a nationwide listeriosis outbreak. Professor Forsythe also said that in March 2019 he will be providing seminars to 3M China on the microbial safety in infant formula. Mr Geoff Brown said that he was working with the Agricultural Industries Confederation to develop an on-line CPD training module on supplementation in livestock.

6. Ms Booth declared that she had been appointed the Chair of FEFAC feed safety Committee and also a governor of Bishop Burton Agriculture College. Professor Givens said that he was undertaking work funded by the EU European Institute of Innovation and Technology (EIT) which also involved Valio and the University of Helsinki. Professor Givens also said that he had recently joined the Advisory Committee of the School & Nursery Milk Alliance. The ACAF Chairman confirmed that had been reappointed as a consultant physician to the Oxford University Hospitals.

7. Dr Tim Riley said that he had been appointed to be a director of beef short society. Professor Harwood confirmed that she was part of a team that has applied to Defra for permission to carry out a field trial of GM wheat and gene edited Brassica in Norwich; She is also been a member of an evaluation panel assessing the work of GenOK, a Norwegian Centre for Biosafety. Additionally, Professor Harwood said she is a member of the BBSRC BBR (Bioinformatics and Biological Resources Fund) panel and has been appointed as an editor for Scientific Reports. Ms Davison declared that she been appointed onto the management committee of National Council of Women.

Agenda Item 2 – Draft Minutes of the seventy sixth Meeting (MIN/18/02)

8. The minutes were agreed subject to the following amendments:

- Paragraph 10 last bullet point – amend to read 'the Defra assessor disagreed that anecdotal evidence should be entirely discounted as evidence. However, the Defra Assessor and Professor Smith agreed that it can point to possible areas for further scientific study.'
- Paragraph 19 last sentence – amend to read 'He confirmed that aquaculture had been excluded.'

Agenda Item 3 - Future plans for SACS

9. Ms Cath Mulholland introduced ACAF paper 19/01. She provided background on the history explaining the paper was to provide an update on the work that the FSA had undertaken to develop its scientific capability, in light of the potential changing demands on risk assessment brought by the proposed UK exit from the EU.

10. Ms Mulholland said that following the UK's withdrawal from the EU, the FSA needs to be able to respond effectively to a potentially significant increase in the need for advice at national level on risk assessment including that for regulated products. The FSA will therefore need to ensure it has access to all relevant experts in risk management and risk assessment, and to ensure that its systems for accessing these demonstrate a functional separation between risk assessment and risk management. In order to meet the possible increased need on risk assessment advice Ms Mulholland explained that the three committees COT[1], ACMSF[2] and ACNFP[3] are to be expanded.

11. For regulated products, three new Joint Expert Groups will be established to take on the bulk of this work:

    - 1. Food contact materials;
    - 2. Additives, flavourings, enzymes and other regulated products;
    - 3. Animal feed and feed additives.

    • The first two will be Joint Expert Groups of COT and ACMSF, and the third will also be joint with ACAF, consistent with the existing remits of those three parent committees. ACNFP will provide advice on approvals of novel foods and GM (food and feed).

12. In terms of the work that ACAF currently undertakes on risk management and other related work Ms Mulholland advised that this will be done through a consultative group – details of which are still being formulated. This would provide a clear separation from ACAF's advice on risk assessment. Ms Mulholland confirmed that the ACAF Secretariat and the FSA Chief Scientific Adviser's Team would like to work with the Chair of ACAF and Members as the FSA develops and tests the new structures and to ensure a smooth transition to ensure that the best use is made of the skills and expertise of ACAF Members. As a first step Ms Mulholland said that ACAF Members had been asked whether they would be willing, in principle, to serve on the Joint

[1] Committee on Toxicity of Chemicals in Food
[2] Advisory Committee on the Microbiological Safety of Food
[3] Advisory Committee on Novel Foods and Processes

Expert Groups (including the joint COT/ACMSF/ACAF group covering feed and feed additives), to work as co-opted members with other FSA SACs, and/or to be part of the planned new structures to provide risk management or technical advice. .

13. Ms Mulholland asked Members to note the contents of ACAF paper 19/01, to provide views and comments and also provide details if they wish to work on the expert working groups.

Discussion

14. The ACAF Chairman confirmed that he had had several meetings with senior FSA officials to ensure that the advice provided by ACAF was not lost and there should also be a consultative committee that would cover risk management issues. ACAF's current work falls in this area and Members can provide a lead. The Joint Expert Working Groups would hold their first meetings in April or early May. The ACAF Chairman was also hopeful that a cooperative parallel relationship between ACAF and the expert working groups would develop.

15. The ACAF Secretary added that as a result of EU Exit there would be a need to undertake risk assessment at the national level, which is currently undertaken at EU level by EFSA. The UK will have access to opinions of EFSA but will also need to undertake its own risk assessments. Hence the reason for the setting up of the Expert Working Groups. Previously ACAF did undertake risk assessment of dossiers before the establishment of EFSA. The vast majority of the work of ACAF though also covered risk management. There will be opportunities for current Members to work on risk assessment and hopefully risk management in the new structures.

16. The ACAF Chairman saw the positive and negatives of the new arrangements, noting that the ACAF Committee had previously always maintained its individual integrity. He then sought members views on the proposals outlined in ACAF paper 19/01. The majority of Members confirmed that were willing to serve on the Joint Expert Working Groups or the consultative committee, depending on the requirements of the FSA and their relevant expertise. However, a few Members did confirm that at the end of their appointments they would not pursue a further term of appointment.

17. Following questions on terms of appointment and the ability to continue as Members of the proposed consultative committee, Ms Mulholland advised that it would be a separate body and there would be no time limits of appointment.

18. Members also raised questions on the expected time commitments, the volume of work and whether consumer representatives would be asked to sit on the Joint Expert Working Groups. Ms Mulholland advised that it is

envisaged that the time commitment for the joint expert groups could be as much as (approximately) 6 meetings/year with additional time (around a half day/meeting) needed to review committee papers. It was uncertain at present what the work volume would be. Ms Mulholland also said that there would be no consumer representatives on the joint expert groups, but they would be able to contribute to the SAC's oversight of the work of the groups. However, where necessary, consumer representatives could be consulted at an earlier stage, possibly working with the joint groups directly. The ACAF Secretary confirmed that a consumer representative would be invited to join the consultative group. He also reminded the Committee that its remit not only dealt with feed for animals for human consumption but also for animals not for consumption. The current ACAF committee has responsibilities across government and the devolved administrations.

19. In summing up, the ACAF Chairman said that the new structure has merit and Members should be able to usefully apply their expertise to a number of the new structures.

20. The assessors made the following comments:

- The Defra Assessor acknowledged that one of the roles of ACAF is providing independent advice to the four agricultural Ministers and he therefore requested clarification on going forward – would assessors still have an input in the FSA led Committees? Ms Mulholland confirmed that assessors would be involved in both Committees and expert working Groups.
- The Scottish Assessor noted the discussions on the review and recommendations. She explained that FSS[4] have a scientific branch that would consider risk assessment. FSS were also building its capability to undertake risk management activities.[5] The ACAF Secretary confirmed that the consultative Committee would have representatives from each devolved administration.
- The Welsh Assessor also asked if assessors would be invited to sit on joint Expert Working Groups.

21. It was confirmed following a question from a Member of the Committee in terms of risk assessment that any alignment across devolved administrations was subject to agreement of all Ministers.

[4] Food Standards Scotland

[5] Following the meeting the Scottish Assessor requested that the following text be added to the note of the meeting 'FSS and FSA are working together to develop a UK framework, subject to Ministerial agreement, for food and feed hygiene and safety in line with principles agreed across all UK administrations in 2017. This is likely to build upon existing liaison arrangements as set out in the MoU between our organisations and will cover arrangements for the authorisation of regulated products such as feed additive (for example). For further information please contact enquiries@fss.scot'

22. Finally, Members agreed that this issue would be discussed at a future meeting.[6]

Agenda Item 4 - Feed additives

23. Tim Riley provided an oral update on the work of the Committee's sub-group on feed additives and over-supplementation. Dr Riley, revisiting the reason for the work, said that, due to concerns raised by several members on the lack of regulatory controls the sub-group was set up. The sub-group was looking at optimal ways to communicate with the feed industry in order to emphasise the importance of compliance with maximum permitted levels set for trace elements in feedstuffs. Dr Riley said that the first task of the sub-group was to identify where the risks were – the group looked at the risk profiles, the species that should be excluded and also the nature and source of the supplements and environmental concerns. The sub-group was now trying to synthesise the data from the literature search to identify where the key risks are in order to provide relevant advice. Dr Riley said that the sub-group had produced a matrix which was presented at the June 2018 ACAF meeting. Dr Riley thanked Mark Bond on the excellent work he had undertaken on the literature review.

24. Dr Riley said that the sub-group would meet again in April/May 2019 to consider the data and the literature review and aim to develop relevant and up to date advice. He highlighted a recent article published on 14 February in the Scottish Farmer which demonstrated the importance of the work the group was undertaking. At the June 2019 meeting Dr Riley hoped to provide an update with the conclusions and recommendations of the sub-group, to be finalised by the end of the calendar year.

Discussion

25. Dr Mark Bond confirmed that the literature review document had not been circulated wider but hoped that a final document will be circulated by the next ACAF meeting. The core paper was to identify the most common causes and relative frequency of over-supplementation (including) toxicity of key micro-nutrients in ruminant diets, based on a review of UK and international literature. The review document also compared the relative frequency of micro-nutrient deficiencies for individual trace elements e.g. cobalt, molybdenum and vitamins.

26. Members thanked the sub-group for their work on this area.

[6] Following the meeting, the VMD confirmed that although it has a committee covering veterinary products – the Veterinary Products Committee (VPC), in terms of medicated feed, the VMD expressed the view that this area should remain under the umbrella of ACAF.

27. The ACAF Chairman asked when an executive summary of the work would be available. Dr Riley hoped that this would be available at the June 2019 meeting. In terms preparing the summary, Dr Riley said that this was dependent on the discussion of who were the intended target audience and how the data would be analysed.

Action: Sub-group

28. Following a question from a Member of the Committee on whether recommendations would be prepared for the Food Standards Agency, it was confirmed that the impact on industry and the risks, had to be considered and therefore a discussion on this point was warranted. Another Member of the Committee said that the work of the sub-group should be presented through the farming community

Action: Sub-group

29. The ACAF Secretary thanked everyone for their input and asked for the Working Group Chairman to elect a Member of the sub-group to prepare the summary paper. He suggested that this work would be a continuum for the consultative Committee. A Member of the Committee said it was important to identify the risks and the consequences, which the literature review helps to outline. The Member added that the matrix could be used when disseminating the advice and the recommendations of the group.

Action: Sub-group Chairman

Agenda Item 5 - Raw Pet Food

30. Scott Reaney (APHA) introduced ACAF paper 19/02. Mr Reaney provided some background saying that raw meat or offal product is minced and commonly mixed with fruit or vegetables however the process does not include a microbial kill step. There has been a growth in the sector over the last five years with nearly 100 businesses now operating. Mr Reaney advised that some larger businesses are now considering entering the sector due to the growth in the market for a raw product. There are fluctuations in businesses entering the sector. Mr Reaney thanked Members for their comments on the paper presented at the June 2018 meeting. He said that since the last meeting PHE[7] had issued guidance mainly for the end users, however further work was required on the PHE guidance to provide guidance on the risks with vulnerable groups and those who are pregnant. Mr Reaney is in discussions with the PHE to augment the PHE guidance paper on these

[7] Public Health England

points. A link to the PHE guidance had been included in the current draft guidance document.

31. Mr Reaney confirmed that there is no legislative requirement to test for the presence of *Listeria* and therefore businesses may ignore this if it was included in best practice advice. Legislation only prescribes the testing for the presence of *Salmonella* and *Enterobacteriaceae*. He suggested that discussions with the industry through the PFMA[8] should take place in order to enhance the PFMA guidance which would include consideration of all microbiological risks, how to mitigate the risks and how best practice guidance on these microbiological risks could be incorporated into the PFMA guidance with a view to obtain 'buy-in' from the industry.

Discussion

32. The Chairman invited the PFMA to comment on this issue. Michael Bellingham (Chief Executive PFMA) said that he was happy with the work on the paper adding that a sector specific committee would be meeting shortly and would discuss how to take forward the issue of microbiological testing. He acknowledged the growth of the sector that has resulted in the PFMA invitation to the sector committee to be members of the raw group. Lana Morgan added that the PFMA were proud of the industry guidance that has been published and thanked the APHA, Defra and FSA for their help in preparing the guidance. This is a living document which will be updated as necessary. Mrs Morgan added that the sector specific Committee were to set up auditors looking at safety standards. Mr Reaney said that PFMA guidance was used by both members and non-members as well as auditors.

33. The ACAF Secretary said that ACAF was not the only government committees that is looking at this issue e.g. DARC[9], UKZADI[10] and PHE. He was appreciative of the work done with the PFMA, APHA and Defra. The ACAF Secretary confirmed that further discussions on this subject will take place.

34. One Member of the Committee voiced disappointment on the guidance document in particular the lack of advice on *Listeria*. The Member drew attention to the committee regarding the material on microbiological risks associated with raw pet food which had been provided from ACAF meeting of 10 May 2018.The Member provided some facts and figures on the fatality rate of Listeria monocytogenes to humans, both pregnant and non-pregnant. He added that in the proposed Best Practice document there are two hurdles for reducing exposure to *Salmonella*, i.e. easy detection and temperature control. However, there are no hurdles for reducing *Listeria* exposure which has a higher fatality rate than *Salmonella*. He reminded the committee the initial

[8] Pet Food Manufacturers Association
[9] Defra Antimicrobial Resistance Coordination (DARC) Group
[10] UK Zoonoses, Animal Diseases and Infections Group

presentation on this topic (ACAF/18/03) referred to the legislation; Article 4 of Regulation (EC) 767/2009 on the placing on the market and the use of feed required 1(a) it is safe; and 1(b) it does not have a direct adverse effect on the environmental or animal welfare. Given *Listeria* is an animal pathogen, then the lack of testing meant it did not meet either of the regulatory requirements with respect to 'safe' for animal welfare. The additional lack of warning regarding human exposure (pregnant women, etc) to Listeria monocytogenes was an additional concern. He though acknowledged that the NHS website which is referenced in the paper does make references to *Salmonella.* However the NHS web site, along with all the other references, did not refer to *Listeria* in raw meat.

35. The ACAF Chairman asked how many incidents were attributable to *Listeria* in raw pet food. Dr Bond thought there had only been one out of two-twenty pet food incidents that was attributable to *Listeria* in 2017. A Member of the Committee stated that epidemiologically it was difficult to determine the source. The Member therefore suggested that a clear statement should be added to the guidance to acknowledge that *Listeria* affected the vulnerable and the old. Another Member of the Committee asked about legislative requirements and procedures adopted in other countries. The Member also asked if there was guidance on advertising formats as promotion of raw pet food could be misleading. In response Mr Reaney agreed that *Listeria* was a risk but a discussion with the sector was needed to debate the issue of microbiological testing and find the best way forward. On advertising Mr Reaney advised that there was a lot of information available in the public domain that focussed on the sourcing of material. Other countries such as the USA and Canada have also raised concerns on raw pet food and USA stipulates the testing of raw pet food for *Salmonella* and *Listeria monocytogenes*.

36. Following a suggestion by a Member of the Committee to re-introduce text on segregation Mr Reaney said that he would raise this point with the PFMA. Another Member of the Committee thought that although there was no legislative requirement for testing for the presence of *Listeria,* reference to it should be made in the guidance. Members of the PFMA agreed to take ACAF Members concerns on board and raise these with the sector specific group.

37. Other Members of the Committee provided the following comments:
    - businesses should be using HACCP to identify risks;
    - There is a need to be clearer on the transport section on the materials being described;
    - freezers should have warning labels on them; and

- due diligence and safe sourcing – operators will refer to guidance on due diligence, so *Listeria* should be referenced in the guidance.

38. The Defra Assessor advised that DARC was interested that imported raw materials were sometimes found to carry AMR patterns not found in the UK. He also enquired as to whether the entry of the big players into the raw pet food market would result in the raising of standards? Mr Reaney thought it was too early to say but would hope so.

39. In terms of publication, the Committee agreed that a further draft was required for comment by Members. It was also suggested that there could be a dual way for discussing this subject, via the Consultative Committee and through the Joint Expert Working Group.

Action: Mr Reaney

Agenda Item 6 - Matters Arising from previous minutes of meetings

40. The ACAF Chairman advised that he had raised the point that there should be an animal feed expert on the Science Council at the biannual meeting of SAC Chairs. A member of the Science Council is taking this forward in liaison with the ACAF Chairman. A Member of the Committee suggested that it would be appropriate to have a person with animal feed expertise to serve on the Science Council. The ACAF Chairman agreed to take this forward.

Action: ACAF Chairman

Biannual meeting of SAC Chairs

41. The ACAF Chairman advised Members of discussions held at the last biannual meeting of SAC chairs. These included updates from The FSA Chair, the Director of Science and the FSA Chief Scientist.

42. The ACAF Chairman also provided details from the Science Council meeting. Further details on the Science Council can be found using the link: https://science-council.food.gov.uk/science-council-meetings

Agenda Item 7 – Any Other Business

In-Ovo feeding

43. A Member of the Committee had seen a number of reports on In-Ovo feeding of chicks (vitamins, minerals and other nutrients being injected into eggs at approximately day 17-18 of incubation and asked whether the Committee should be considering this under horizon scanning. The Member was asked to monitor developments and raise with the Secretariat for a potential discussion paper for presentation at a future meeting.

44. .

Action: Member/Secretariat

Insect Protein

45. Following questions from Members of the Committee on the use of insects to feed poultry and fish, Mr Reaney said that there had been no massive growth within the UK, the work was still at technical stages – a lot of companies were researching co-products i.e. high-quality oils produced from insects. Dr Bond added that live insects fell under the Animal By-Products legislation and that processed insects could only be used to feed aquaculture. Dr Bond referred Members to Paragraph 18 of the EU Developments paper. The PFMA said it had asked members about the use of insect protein. Although they had received a high response it was confirmed that products were not near the commercial market as yet.

ACMSF – AMR sub-group

46. The ACAF Chairman noted that the group had resumed its activities following the publication of its report. A Member of the Committee confirmed that the group considered rolling subjects dependent on questions from FSA. The VMD official said that the department had recently published its 20-year strategy on AMR. Although not a work area for ACAF, the VMD official agreed to provide appropriate text to the ACAF Secretariat for dissemination to ACAF Members.

Action: VMD

Next meeting

47. The date of the next ACAF meeting is to be confirmed.

ACAF Secretariat

June 2019

Q&A

James McCulloch (Agricultural Industries Confederation) confirmed he was involved in the task and finish group on insect protein and that start-up companies generally have no experience of compliance with legislation on livestock farming or feed production issues. Therefore, the risks associated with the production of insects as an alternative protein source for livestock will need to be carefully managed.

Mr McCulloch also said that between May 2018 and January 2019, the EFSA FEEDAP Panel had published fifty scientific opinions to assess feed additive applications for authorisation and re-authorisation. Mr McCulloch sought clarification that once the UK left the EU that the UK had sufficient resources to undertake the work currently done by FEEDAP.