DRAFT MINUTES OF THE SEVENTY FOURTH MEETING OF ACAF HELD ON 17 OCTOBER 2017

Present:

Chairman	Dr Ian Brown	
Members	Miss Michelle Beer	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 David Peers
	Dr Tim Riley	Prof. Robert Smith
Secretariat	Mr Keith Millar (Secretary)	Food Standards Agency
	Miss Mandy Jumnoodoo	Food Standards Agency
	Dr Mark Bond	Food Standards Agency
Assessors		
	Ms Claire Moni	Food Standards Scotland
	Mrs Karen Pratt	Food Standards Agency
	Mr Stephen Wyllie	Defra
	Mr John Hirst	FSA Wales
Officials	Ms Nina Dorian	Veterinary Medicines Directorate
	Ms Annie Green	Veterinary Medicines Directorate

1. Dr Brown welcomed everyone to the meeting.

2. Apologies for absence were received from Mr Edwin Snow.

3. The ACAF Chairman informed Members that Alan McCartney Northern Ireland Assessor had recently moved jobs and will no longer be attending ACAF meetings. On behalf of the Committee he thanked Alan for his involvement in the Committee and wished him well in the future. Northern Ireland colleagues have yet to nominate a replacement for Mr McCartney.

Agenda Item 1 Declaration of Members' interests

4. Professor Smith advised that he has spoken with the ACAF Secretariat about activities he has undertaken with Tesco. Ms Davison confirmed that she is a Member of the National Council for Women.

5. Professor Forsythe announced that he has been asked to produce a webinar on infant formula protein.

Agenda Item 2 – Draft Minutes of the Seventy third Meeting (MIN/17/02)

6. The minutes were adopted subject to a reference being added on the EFSA opinion on insect protein (paragraph 33 of the minutes refers).

Agenda Item 3 –Refuse Derived Fuels (RDF)

7. Mrs Pratt updated the Committee on the progress of this item and confirmed that the RDF Industry Group had published its Code of Practice for the UK the previous day. The launch had been held in the House of Commons in conjunction with the All-Party Parliamentary Sustainable Resource Group. She thanked members for their contributions in-between meetings to agree a statement for inclusion on the publication press statement and also passed on the RDF Group's thanks for the Committee's input throughout the whole process.

8. The final Code of Practice reflected the contributions from the Committee particularly within the Storage section which included advice on –

- Storage away from feed or food;
- Storage for as short a time as possible where food or feed is also stored at the port;
- Regular monitoring of the wrapping to prevent cross contamination; and
- Liaison with owners of animal feed or food if insecticide spraying is to be carried out.

9. At its June meeting the Committee had agreed other recommendations on this issue concerning raising awareness amongst local authorities and encouraging closer liaison with other enforcement authorities such as the Environment Agency. Mrs Pratt confirmed she would be taking this forward with the National Agriculture Panel and the National Animal Feed Ports Panel and also copying the devolved administrations. Notification would also be published on the Trading Standards online forum.

Discussion

10. The ACAF Chairman reflected on the speech made by Baroness Jones of Whitchurch who opened the Launch and also commented that the Committee had made a significant difference to the content of the Code as regards its specific reference to food and feed. A Member asked that a watching brief should be made especially on the text covering storage of RDF. The ACAF Secretary said that the publication was a living document and the RDF Group would be revisiting it. The ACAF Secretary also pointed out that from a sustainability perspective, the use of refuse as fuel was a positive initiative so it was important to try to make it workable. A Member of the Committee wanted to see what the uptake of the document would be and Mrs Pratt advised that the FSA would be asking local authorities to notify the Agency if further problems arose. The enforcement member thought it was a useful tool and suggested that a letter informing of the publication should also be sent to the National Trading Standards Board. The ACAF Secretary also confirmed that all parts of the UK would have sight of the advice sent.

11. The ACAF Chairman asked if there was an obvious breach, who would have enforcement responsibilities? The enforcement Member confirmed that if the issue was storage and transport of the RDF the enforcement activity would rest with the Environment Agency. If contamination of feed or food took place then this would be an issue for the local authorities.

12. Another Member of the Committee asked about on-farm storage and was concerned that this should not be taking place at all.

The FSA Assessor said that this aspect would be raised when notifying local authorities.

13. In concluding the discussion on this item, the Chairman congratulated the Committee on the work they had undertaken on this important health and safety issue.

Agenda Item 4: Feed Additives

14. Miss Jumnoodoo introduced ACAF paper 17/12. She asked Members to confirm whether they wished to be part of a working Group that would take forward suggested work areas outlined in the paper. Members were then invited to comment on the individual work strands suggested.

Discussion

15. In response to Miss Jumnoodoo's introduction Members made the following comments:
    - there was a need to also consider animal welfare as it was not clear about the health effects of over-supplementation and how it impacts on the food chain;
    - there will be a limit on what can be done given the available resources. The working group therefore needs to think through time scales for delivery and outcomes. The ACAF Chair suggested that the first action is to clearly define what the problem is and its impact;
    - farmers' should be made aware of the issues;
    - the working group should focus on where the problem lies, for example the ruminant, equine or monogastric sectors;
    - in terms of sampling, the numbers examined may be too small for an issue to be found. It was a combination of multiple additive inputs which may well be the cause of the problem;
    - education is an important element, however compliance is the responsibility of the farmers but they may need help.
    - a whole dietary assessment should be undertaken;
    - it was confirmed that a paper would be presented to the British Cattle Veterinary Association Conference on 20 October 2017 and this would cover some of the issues previously raised;
    - it was acknowledged that the limits of variation allowed are wide and there are numerous products available, e.g., blocks and

licks, which farmers may not have detailed dietary information on. It was difficult to identify where all the inputs are – soil and forage for example;

- it was suggested that AIC's Feed Register might be a good route for information gathering and dissemination. The ACAF Secretary advised it may be appropriate to approach individual organisations when they have specific questions;
- it was agreed that Trading Standards Officers' workloads would need to be considered. Additionally, links with National Agriculture Panel and National Trading Standards Board, should be made. However, training for local authorities would also be welcomed; and,
- on sampling there could be a change to the FSA visit forms to gather information on supplementation via water, feed, boluses, licks etc.

16. In terms of Membership, the following Members indicated that they were keen to be part of the working group:

Tim Riley – Chair	Geoff Brown	Peter Francis	Rob Smith	David Peers	Michelle Beer

17. The Defra Assessor said that the APHA would be content to provide support as necessary especially in answering specific questions but would not necessarily attend all the meetings. Additionally, VMD officials who attended the meeting will be consulting with colleagues to ascertain what role they can provide. It was also suggested that the AHDB should be invited to input into the work.

18. In terms of the Secretariat this would be provided by the ACAF with input from a member of the Agency's animal feed delivery team and a social scientist.

19. It was agreed that the working group would meet before the next full committee meeting in February 2018. At the inaugural meeting, the working Group would agree its terms of reference as well as undertaking a further scoping exercise to assess the size

and potential length of the task and any additional members that should be invited to participate.

Agenda Item 5 - Biostimulants

20. ACAF Member Ms Chris McAlinden gave a presentation on the emerging technology of biostimulants (paper ACAF 17/13). In summary, Ms McAlinden outlined that biostimulants focus on the complex biochemical interactions of whole plant growth and nutrition, including microbiome exchange, rather than a simplistic approach of root nutrient uptake, and pesticide control. The role of biostimulants would fall between the two; by enhancing nutrient update, efficiency, tolerance and crop quality. Ms McAlinden summarised the different regulatory controls for pesticides and fertilisers. Pesticides are subject to a full environmental and health assessment whereas fertilisers must adhere to prescribed quality limits. Biostimulants are generally considered to be non-toxic such as micro-organisms, enzymes or trace elements; including fungi, bacteria, humates or saponins. Ms McAlinden provided examples of specific biostimulants; including current commercial products and highlighted recent research areas. Biostimulants are a growing market, being recognised by the establishment of the European Biostimulants Industry Committee (EBIC); however, there remain ambiguities in a standardised definition of biostimulants.

21. Ms McAlinden did say that a specific functional category for biostimulants is to be incorporated into the fertiliser regulations; however, it is uncertain whether any specific safety assessment is required and whether ingredients such as biostimulant preservatives would be included within this scope. Currently, in the UK there is no regulatory requirement for the sale of biostimulants, however in other countries there are some regulative controls on pre-market approvals.

22. Professor Harwood acknowledged that biostimulants were still poorly defined, including where the mode of action may not be understood. In addition, Professor Harwood emphasised that there are clear benefits but also expressed some concern over biostimulants derived from animal materials, such as those sourced from chicken feathers, haemoglobin, waste from seafood, tanning or from bovine hooves and horns.

Discussion

23. In response to a question raised by the ACAF Chairman on if there were any human or animal equivalents of biostimulants – Ms McAlinden likened such products to probiotics using gut bacteria, or the emerging area of cosmeceuticals (cosmetics incorporating bioactive ingredients) where mode of action is poorly understood but positive effects can be observed.

24. The ACAF Chairman queried the implications of residual biostimulants absorbed into crops for use as animal feed. Ms McAlinden responded that in general biostimulants are assumed to be non-hazardous, but some products state their active component remains in the plant for several weeks. The ACAF Chairman asked how this topic relates to the work of the Committee. Ms McAlinden stated that at present there was not a significant focus for the Committee but this was an opportunity to raise awareness of this emerging technology; but as the sector and regulatory requirements develop, it was recommended for the Committee to keep a watching brief.

25. Professor Harwood also viewed that there are currently no issues for the majority of biostimulant raw materials, but reiterated potential concern in the use of animal derived materials. One Committee Member referred to a recent Agri-trade news article on animal derived biostimulants, where some UK crop businesses have rejected their use due to public perception. The Committee Member also expressed some concern of biostimulants being defined as feed materials; such as for fertilisers, which are not authorised compared to feed additives which require greater regulatory control.

26. The ACAF Chairman sought confirmation whether this issue had been raised in Brussels. Dr Bond confirmed that no discussion had taken place in European Commission meetings on animal nutrition, but indicated that TSE and animal by-product regulations would come into play and agreed to seek views from relevant colleagues.

Action: ACAF Secretariat

27. Another Member of the Committee asked about the potential of allergens entering the feed chain and consumers not being aware of the added biostimulants. Ms McAlinden acknowledged that there could be a potential issue, with numerous plant products (especially oils) known to be skin sensitisers for example. In addition to allow a commercial shelf-life; biostimulants may contain preservatives which by their very nature, would persist within the plant/environment rather than be degraded. The current regulatory frame work for preservatives does not appear to include any default scenario which includes agricultural use and residue in the food chain. Professor Harwood also acknowledged that allergenicity to biostimulants could not be ruled out and would need to keep a watching brief.

28. Another Member of the Committee indicated that if a biostimulant product declared medicinal claims; such as increasing animal health, then veterinary medicine regulations will also come into play. The Member also expressed concerns where the biostimulant raw material may be unknown or produced from other waste-streams, especially with concern over products of animal origin, citing the risk of botulism from poultry litter if spread over farmland. The Member therefore questioned the need to apply withdrawal periods for livestock pastured on such treated land.

29. Another Member of the Committee said that biostimulants for plant growth would be marketed as fertilisers, but queried whether biostimulants are routinely used on arable or grasslands for direct feeding to animals.

30. Another Member highlighted that the use of enzymes; such as for feed additives are generally presumed to be safe and Ms McAlinden also stated the acceptance on the use of some biopesticides, such as nematodes used in crop pest control. Similarly, at this early phase, there are also issues of definition for biopesticides and biofertilisers, and with such diversity in biostimulants, it was suggested that biostimulants be divided into different functional categories. Further discussion extended to the

use of genetically modified organisms and the potential use in open environments, rather than their permitted use in feed additives under contained fermentation systems. With the concerns raised during these discussions, it was recommended that this topic remain on the agenda as a watching brief and to seek further information from EBIC.

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Agenda Item 6 – –Forward Work Plan

31. Miss Jumnoodoo introduced paper ACAF/17/14 on horizon scanning and future work for ACAF. She asked the Committee to agree the proposals for the movement of item priorities and amendment of titles of items in the plan, as suggested in the paper. The ACAF Chairman then invited the Committee to review the individual items in the forward work plan.

Discussion

32. Members agreed to rationalise the titles of some of the items in the Forward Work Plan. After discussion, the Committee agreed that further work was required before the Forward Work Plan could be finalised.

Agenda item 7 - Any Other Business

Update on the EU proposal on medicated feed

33. Nina Dorian (Veterinary Medicines Directorate) provided an update on the latest position of the EU proposal on medicated feed. She explained that the discussions on the medicated feed proposal had recommenced in Brussels in September 2017 following the last meeting held in January 2016. Discussions on the Veterinary Medicinal Products Regulations have progressed to attaché level with a consolidated text to be agreed by the end of year. A meeting to discuss the medicated feed regulations was scheduled to take place in Brussels on 18 October 2017. It is assumed that the text will eventually be discussed and progressed at attaché level although no date has been set for this to happen. Ms Dorian advised that discussions were likely to continue after the UK leaves the EU.

Update on the ACMSF's sub-group on antimicrobial resistance

34. Professor Forsythe provided a short update on the work of the ACMSF's sub-group on antimicrobial resistance, (co-opted member). He confirmed that as from March 2017, the main sub-group had been expanded to form a 'Task & Finish' Group. This consists of existing members of the AMR sub-group, supplemented by co-opted members from universities, PHE and VMD. Currently this expanded group is working on an AMR systems map to determine the influences on the development of AMR which covers both bacteria and genes through the food chain.

Mycobacterium avium paratuberculosis risk assessment

35. Professor Smith provided information on work being carried out on mycobacterium avium paratuberculosis (MAP) and the potential of calf milk replacer being a route of infection of animals with MAP.

Meeting with FSA Chief Scientist – Guy Poppy

36. The ACAF Chairman updated Members on a one-to-one discussion he had had with the FSA Chief Scientific Adviser (Guy Poppy) on 2 August 2017. This concerned the future work of ACAF and the responsibilities and work of the newly established FSA Science Council.

ACAF Secretariat

November 2017