MINUTES OF THE SEVENTY-FIFTH MEETING OF ACAF HELD ON 15 February 2018, Wellington Grange Hotel, London

Present:

Chairman Dr Ian Brown

Members

Mr Geoff Brown	Ms Ann Davison
Prof. Ian Givens	Prof. Stephen Forsythe
Prof. Wendy Harwood	Mrs Christine McAlinden
Dr David Peers	Dr Tim Riley
Prof. Robert Smith	Mr Edwin Snow

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
Ms Elizabeth Hirst	FSA Wales

Officials	Ms Annie Green	Veterinary Medicines Directorate
	Mr Stephen Nixon	DAERA

1. Dr Brown welcomed everyone to the meeting.

2. Apologies for absence were received from Miss Michelle Beer, Ms Angela Booth, Mr Peter Francis, Mrs Karen Pratt (FSA Assessor), Mr Stephen Wyllie (Defra).

Agenda Item 1 Declaration of Members' interests

3. Mr Geoff Brown declared he had an interest on agenda item 3 (algae used as animal feed) and agenda item 5 (formaldehyde) in his capacity as the General Secretary to the British Association of Feed Supplement and Additive Manufacturers. Professor Smith advised he undertakes activities with Tesco. The ACAF Chairman

advised he has undertaken work for Public Health England. Mrs McAlinden confirmed that she has provided advice to an American company on veterinary medicines.

4. Mr Snow announced that he has customers who use/manufacture formaldehyde. Mr Snow also advised that he works for the company who are the authorisation applicants for formaldehyde. Ms Davison said that she had written a blog on the UK's decision to leave the EU and its implications for food.

Agenda Item 2 – Draft Minutes of the seventy fourth Meeting (MIN/17/03)

5. The minutes were adopted subject to the following amendments:

- paragraph 5 to be amended to read –'Professor Forsythe announced that he has been asked to produce a webinar on the detection of infectious bacteria in infant formula'.
- the third sentence to paragraph 25 to read –' The Committee Member also expressed some concern about the regulatory status of biostimulants, in that being aligned with the fertiliser regulations, rather than the pesticide regulations, they may be subject to less strict regulatory controls than feed additives and pesticides.'

Agenda Item 3 –Use of Algae as animal feed (ACAF/18/01)

6. Dr Gerry Dillon (Alltech) introduced ACAF paper 18/01 providing Members with a case study and research update undertaken by Alltech on the use of algae as animal feed. The Committee were informed of the research results which indicate that the benefits of the use of algae in animal feed were increased production efficiency, good product quality and health benefits for human and animal populations. Dr Dillon advised that some Alltech algae products as animal feed were available in many parts of the world, such as the EU and Canada, and that others were going through an approval process in the USA before being marketed.

Discussion

7. Following Dr Dillon's presentation, Members raised a number of points and questions to which Dr Dillon responded as follows:

- there are only certain algae strains which are suitable as a food and feed;
- Alltech has yet to commercialise any algal food supplement products;
- Alltech has done some preliminary work investigating algae as a mycotoxin binder;
- Alltech was considering replacing the synthetic antioxidant ethoxyquin in the formulation;
- one of the main input costs in the process system to produce the algae for animal feed was sugar;
- processing involved drying of the algae;
- Alltech test the product from the closed system process as part of the requirements of Directive 2002/32 on undesirable substances to maintain purity;
- algae is a source of long chain n-3 fatty acids and can also be used as a source of protein;
- Alltech commercialise a number of products in the EU at the moment. Algae is also marketed by other companies;
- light is not an advantage during the heterotrophic production of the algae; and
- Members requested further information on developments when available.

Agenda Item 4: Feed Additives

8. The Committee has discussed on several occasions optimum ways to communicate with the feed industry to emphasise the importance of compliance with maximum permitted levels set for trace elements in feedstuffs. At the October 2017 meeting, Members agreed that a Working Group would be convened and report on the outcome of the inaugural meeting at the ACAF Committee's main meeting in February 2018. The Chairman of the Working Group on feed additives and over-supplementation, (Dr Tim Riley), reported that an inaugural meeting had been held in December 2017 where the group agreed its name and terms of reference. Additionally, after looking at the evidence on the issue, the size of the task and present known compliance at farm level, the Group agreed that it did not wish to duplicate work already being carried out. It therefore initially agreed to produce a matrix on the species against particular supplements and additives which should be considered as part of the Group's work. Other areas discussed by the Group included identification of knowledge-gaps; the role of local authorities; and methods of communication.

Discussion

9. In response to Dr Riley's oral update, Members made the following comments:

- it was acknowledged that the topic was an immense subject to investigate and that the working group may need to call upon external experts to help with the delivery;
- the working group will also need to work with local authorities;
- an issue to be addressed was non-compliant products which could be bought on the internet;
- it was important to understand the background and consequences of over-supplementation;
- a second meeting of the working group was planned for March-April 2018; and
- the Working Group Chairman agreed to provide a full presentation at the Committee's June 2018 meeting.

Agenda Item 5 – Update on Formaldehyde (ACAF/18/02)

10. Dr Bond, in introducing paper ACAF/18/02, provided historical background on the status of formaldehyde, as a feed additive. Dr Bond also advised that a denial of the authorisation of formaldehyde as a feed additive was voted on at the December 2017 EU Standing Committee meeting where a qualified majority vote in favour of denial was achieved. Regulation (EU) 2018/183 was published in the Official Journal of the European Union on 8 February 2018 and comes into force twenty days after its publication. Dr Bond concluded the introduction by asking Members for their views.

Discussion

11. Members provided the following comments and suggestions:

- industry had acknowledged the work the FSA had put into this subject area;
- members commented that formaldehyde has been used as a decontaminant and that other alternatives are less effective or carry more risks for the user. It was pointed out that formaldehyde can still be used as a biocide but not as a feed additive; and that the Regulation provides a transition period for the existing use of formaldehyde as a preservative, but not for the proposed use as a hygiene condition enhancer;

- a Member of the Committee suggested that formaldehyde could be used as a processing aid to control bacteria rather than requiring a specific authorisation as a feed additive.
- formaldehyde can be used on indirect contact surfaces but not in direct contact with feed; and
- members agreed that safety of workers was important, however focus on reducing microbiological hazards on farms was needed.

Agenda Item 6 – Raw Pet Food (ACAF 18/03)

12. Dr Bond introduced paper ACAF/18/03 with an emphasis on the frequency of incident notifications, outlining that the purpose of the item was to make the Committee aware of the issues surrounding raw pet food and to seek their comments.

Discussion

13. After the introduction, Members and others in attendance raised the following points:

- acknowledged that raw pet food was a growing sector;
- raw pet food is a choice made by pet owners (mostly for dogs); although there is anecdotal information on benefits it is essentially the owners choice to buy raw pet food. Also, it was unknown whether pets had a preference for raw or conventional pet food;
- the number of raw pet food manufacturers in the UK had risen from 5 in 2013 to 90 in 2017, with 23 awaiting approval from the Animal and Plant Health Agency (APHA);
- raw pet food is likely to have a higher microbiological load as there is no kill step during processing;
- as part of the legislative requirements, testing for Salmonella and Enterobacteriaceae is required– however, Members questioned why Listeria was not part of the testing requirements;
- raw pet food is generally sold in the frozen state;
- a sub group of the Advisory Committee on the Microbiological Safety of Food had, amongst other bodies, discussed the issue and considered the matter a high priority area;
- the risk to people in the home through inappropriate/unhygienic handling and storage and subsequent cross-contamination of raw pet food was of concern;

- the APHA and Pet Food Manufacturers Association are working in tandem to help manufacturers and consumers understand the risks associated with raw pet food;
- Members agreed that a document should be prepared in consultation with relevant other government departments and cleared by ACAF and the ACMSF highlighting the risks of raw pet food, in terms of storage, handling and use and how any risks can be reduced.

Agenda Item 7 – Update on FSA preparations for the UK's Exit from the European Union (ACAF18/04)

14. Referring to a paper presented to the FSA Board in September 2017, on the preparations being carried out by the FSA for leaving the EU, Mr Carles Orri outlined key issues that the Agency was considering in relation to risk assessment, which particularly interested the Committee. Following Mr Orri's oral update, the Committee raised a number of points on the future relationship between the UK and EFSA, the potential for enhancing the role of the Committee in terms of carrying out risk assessment and ensuring that any risk assessment carried out by the UK was compatible with those carried out by EFSA where appropriate. The Committee also acknowledged that its long-term role had yet to be decided but further resources and expertise may be required in order to enable the Committee to continue providing a high level of expert advice.

Agenda item 8 - Any Other Business

Second FSA Workshop with SAC Chairs

15. The ACAF Chairman reported he had attended the second FSA Workshop with SAC chairs where he gave update on the work of ACAF. It was expected that the workshop would convene at least twice a year.

FSS Preparations for the UK's Exit from the European Union

16. The Scottish Assessor advised Members that copies of a paper presented to the FSS Board in November 2017, on the preparations being carried out by the FSS for leaving the EU was available. The Scottish Assessor added that colleagues in the FSS were working closely with the FSA, and the Scottish government on this issue.

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

17. Professor Forsythe confirmed that the work of the ACMSF's sub-group on antimicrobial resistance 'Task & Finish' Group had ended.

ACAF Secretariat

June 2018

Question and Answer

Stephen Nixon **(Department of Agriculture, Environment and Rural Affairs)** on the FSA's preparations for leaving the EU, asked about the relationship between the EU and EFSA in terms of authorisations, incidents and official controls once the UK leaves the EU. Mr Orri confirmed that these were being considered.