

MINUTES OF THE SEVENTY THIRD MEETING OF ACAF HELD ON 14 JUNE 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	Mr Edwin Snow
Prof. Robert Smith	

Secretariat

Mr Keith Millar (Secretary)	Food Standards Agency
Miss Mandy Jumnoodoo	Food Standards Agency
Dr Mark Bond	Food Standards Agency

Assessors

Mr Alan McCartney	Department of Agriculture, Environment and Rural Affairs NI
Ms Claire Moni	Food Standards Scotland
Mrs Karen Pratt	Food Standards Agency
Mr Stephen Wyllie	Defra
Mr John Hirst	FSA Wales

Officials Mr Giles Davis Veterinary Medicines Directorate

Speakers

Mr Jonathan Davies	Food Standards Agency
Mr Michael Bellingham	Pet Food Manufacturers Association
Dr Monika Prenner	Pet Food Manufacturers Association

1. Dr Brown welcomed everyone to the meeting, thanking colleagues in FSA Wales for allowing ACAF to hold its meeting in Cardiff and for their help in organising the meeting and visit.
2. Dr Brown introduced Richard Bowen (FSA Wales Director), who welcomed the Chair, members of the Committee assessors and delegates to the offices of the FSA in Wales. He said that the out-of-London meetings were particularly important because they help the

Committee to gain an understanding of devolved issues and allowed everyone with an interest in Wales to come along and watch the Committee at work.

3. Mr Bowen thanked those responsible for convening the meeting- the Committee Secretariat who drafted the agenda, documents and prepared the meeting and the FSA officials responsible for the logistics of the meeting and the Committee visit that took place on 13 June 2017.
4. Mr Bowen also extended his thanks to S A Brain & Co for a very informative visit. The controls in place at suppliers of materials, such as brewers' grains to the feed sector are vital to ensuring that feed remains wholesome and safe throughout the supply chain.
5. Mr Bowen stated that there was a proportionally large agri-food sector in Wales, so issues around animal feed are particularly important to FSA Wales. He also commented that the Committee will hear later of the innovative Welsh model for the delivery of official controls on feed. Mr Bowen also appreciated the opportunity to hear from the Pet Food Manufacturers Association (PFMA) and the main issues they are currently facing.
6. He was confident that the ACAF meeting would be informative and productive.

Agenda Item 1 Declaration of Members' interests

7. Mr Geoff Brown reported that he was on a temporary co-ordination assignment with the Agricultural Industries Confederation (AIC) on the development of new training modules for their Feed Adviser Register members. Professor Givens is leading the University of Reading's involvement in European Institute of Innovation & Technology (EIT) Food, a consortium of 50 partners from industry, research centres and universities across 13 mainly EU countries. <https://eit.europa.eu/eit-community/eit-food>.

Agenda Item 2 – Draft Minutes of the Seventy second Meeting (MIN/17/01)

8. The minutes were adopted subject to amendment of the end of the second sentence in paragraph 13:

‘.....throughout its production and transport.’

Agenda Item 3 –Refuse Derived Fuels (RDF)

9. Mrs Pratt gave a brief update on this subject, which the Committee had considered previously on a number of occasions. The RDF Industry Group had hoped to publish its Code of Practice in June but due to the general Election this had been postponed. Mrs Pratt had sent an update to Members on 2 June 2017 –explaining that all the comments made by the Committee had been taken on board. Eunomia were unable to provide an updated version of the guidance as the document was being finalised. Mrs Pratt therefore asked the Committee whether it wished to endorse the Code and also agree to the recommendations on RDF raised at the February 2017 meeting.

Discussion

10. A Member of the Committee asked if the Committee had previously endorsed documents. The ACAF Secretary confirmed that it had done so on a few occasions, for example the Salmonella Code of Practice – however, on that occasion the Committee had made significant input.
11. In the ensuing discussion on whether the Committee should endorse the document, the following points were made:
 - the Committee had yet to see the final document and therefore was unable to confirm that all of its comments had been incorporated;
 - the Committee could write a foreword similar to the one in the Salmonella Code of Practice;
 - the Committee should be supportive of the document but would like to see more clarity as regards the stages in monitoring and verification;
 - the Committee thought the Code required further development regarding biosecurity measures and care on loading RDF onto vehicles especially where it is wrapped;

- the Committee does not have complete control of the document, and how it will be used, therefore full endorsement should not be provided; and
- the Committee's view could be set out in a press release.

12. Since GAFTA had originally brought the issue to the Committee's attention, members sought GAFTA's views on the draft Code, especially whether it had attempted to allay the concerns originally raised. Sarah Mann (GAFTA) thanked the Committee for taking this issue forward. She pointed out that GAFTA had not seen the draft Code but had followed the Committee's discussions on this issue and was pleased to hear that the Committee's comments had been taken on board. The ACAF Secretary said that having spoken to GAFTA previously his impression was that GAFTA considered the Code was a step in the right direction. As part of its investigations, the Secretariat had visited several ports throughout the UK, some of which had good practices, and others needed to make improvements.

13. The NI Assessor stated that he had liaised with the Northern Ireland Environment Agency (NIEA) who confirmed they had two position statements (EWC Classification of Mixed Municipal Waste Leaving Waste Management Facilities May 2016 and Short Term Storage of Refuse Derived Fuel and Solid Recovered Fuel at Dockside May 2016) which address their main concerns regarding the treatment necessary to produce refuse derived fuel (RDF) and the temporary storage of RDF at docks. NIEA were of the view that whilst it is commendable that the RDF Industry Group has taken the initiative in developing guidance for their sector it is unfortunate that the guidance has not taken the opportunity to address the production of quality RDF in terms of treatment requirements and to establish industry standards such as sampling. The document fails to address the key issues for NIEA and as such they will not be able to endorse it. It was also their understanding that neither Natural Resources Wales (NRW) nor the Scottish Environment Protection Agency (SEPA) will be endorsing the document.

14. A Member of the Committee pointed out that it was interesting that the Code of Practice had requirements and recommendations but no definitions. Mrs Pratt pointed out that section 1.8 covered these points. She also asked if the Committee agreed to the recommendations in ACAF Paper 17/01.

15. In summary, the ACAF Chairman said that the Committee welcomed the document and, while it supported the work of the Industry Group, it was unable to formally endorse it. However, it was agreed to issue a press release following receipt of the finalised version. It also agreed to raise awareness amongst enforcement bodies and encourage better liaison between local authorities and the Environment Agency in relation to RDF.

16. The ACAF Secretary agreed to keep the Committee updated on progress.

Action: ACAF Secretariat

Agenda Item 4: Feed delivery Model in Wales – presentation

17. Mr Jonathan Davies introduced paper 17/07. He stated that the UK had about 200,000 animal feed businesses contributing about £4.4 bn to the economy. He provided details of the FSA aims. FVO audits undertaken in 2009 and 2011 recommended that a number of improvements were required, which resulted in a comprehensive animal feed review which ended with the revised feed law code of practice with guidance. He said there were 21,429 feed establishments on local authority databases in Wales. Local authorities have a statutory duty to undertake official controls and enforce feed law, and a number of shortcomings were identified in delivery of animal feed official controls in Wales – FSA, local authorities and Welsh Government worked together to address the issues. Mr Davies said there were six regions in Wales each with a Regional Lead Feed Officer. He then explained the infrastructure for national, regional and local delivery of the official controls. Mr Davies also explained aims and objectives were delivered, stating that the FSA liaised with relevant bodies over issues of enforcement and consistency; ensuring staff are appropriately qualified and that there was monitoring of the implementation of procedures, as well as internal monitoring. Additionally, the FSA in collaboration with the WHoTS¹, funded training.

¹ Wales Heads of Trading Standards

18. Mr Davies then outlined how the delivery model linked to corporate objectives and plans of the FSA. The model is linked to the FSA Strategic Plan 2015-2020. Mr Davies listed the key achievements and future work.

Discussion

19. In response to questions raised by the ACAF Chairman, Members and Assessors, Mr Davies responded as follows:

- as part of enforcement action in the first year of delivery, enforcement bodies in Wales had issued 1361 pieces of advice; 123 written warnings; 3 suspensions of approval/registration; 1 seizure; and 1 disposal;
- on 'earned recognition' vigorous systems were in place and quarterly meetings with the Agricultural Industries Confederation and other bodies were taking place. Earned recognition was a positive achievement which allowed resources to be directed to areas of higher risk;
- work on increasing consumer confidence was progressing;
- there was a difference in the funding mechanism in England and Wales, with a Member of the Committee adding that the mechanism in Wales provided better distribution of funding in relation to numbers and risk of premises by location;
- FSA Wales continued to provide training to local authorities but may in the future develop e-learning packages similar to those being considered in England;
- the most frequent non-compliances identified as part of the enhanced inspections included pest control, HACCP and labelling through sampling;
- all feed regions in Wales are paid the same rate per inspection;
- when a major incident occurs funds can be diverted and other funds made available. A Member of the Committee said England could divert funds on a national basis but not sure about the situation at a local level; and
- where resources are limited at local authorities there could be opportunity for cross-border working. Mr Davies added that inspections predominantly take place during the autumn and winter months during animal housing periods. A Member of the Committee said that most local authorities will not have programmes for on-farm inspections other than feed delivery inspections. More direction is provided by the FSA on where inspections should be directed.

20. The Defra Assessor suggested that FSA Wales may wish to liaise with APHA colleagues.

21. The ACAF Secretary thanked Mr Davies for his presentation and added that he had accompanied the FVO on feed audits and there were issues which had been resolved thanks to the work carried out by Jonathan Davies and local enforcement bodies.

Agenda Item 5 - Feed additives

22. Miss Jumnoodoo, introducing ACAF paper 17/08, said that the Committee had originally considered the issue of copper over-supplementation in 2010 which resulted in the production of a guidance note.

23. At the Committee's October 2016 meeting the issue of over-supplementation was raised by ACAF Member Geoff Brown. At the Committee's February 2017 meeting it was stated that an industry guidance document would be beneficial. It was proposed that a multifaceted approach was required and that short, medium and long-term strategies should be developed that would help to change behaviours in maintaining compliance.

24. Miss Jumnoodoo explained the proposed steps to be taken to address the issue as set out in paper 17/08. She stated that the strategy will aim to map out the communication process; appropriate methods of intervention and by whom; and how the interventions will be delivered. The setting up of a Working Group would also be considered to develop and implement a methodology for evaluating the success in achieving the aims of the strategy. This Group would periodically report back to ACAF with details of tracking and progress, eventually providing ACAF with a final report including an evaluation of the interventions delivered and making appropriate recommendations.

25. Subject to the Committee's agreement it is envisaged that the working group will be established and meet towards the end of summer 2017, with an initial update at the October 2017 meeting. However Miss

Jumnoodoo pointed out that there were a number of considerations that the Committee should be aware of:

- feed additives include technological, sensory, nutritional, zootechnical products and these all have very different purposes and controls, therefore the topic is too broad as it stands and 'one size' will not fit all;
- the issues across species are also very different;
- the main impact (especially for government) is probably environmental, however animal health issues are often associated with over-feeding (obese pets);
- social media and internet sales have an impact on some of the issues (can these really be controlled?);
- consideration should be given to determine if the only realistic end point is better guidance and education. The guidance would need to be specific to the species, additive, purpose of ownership. However this approach should already be covered by a private vet. Therefore should there be linkage with the British Veterinary Association?

Discussion

26. Following the introduction, Members raised the following points:

- the proposal was welcomed;
- the issue was originally raised by contacts in industry who expressed concern about products on the market inherently containing high levels of particular nutritional additives, and questioning how to bring some businesses into line. It is often a situation where multiple feeds are used and farmers inadvertently over-supplement their animals. The EFSA authorisation process needs tighter controls and lower maximum permitted levels (MPLs) as a result of lack of trust at farm level. This impacts Commission approval and regulation;
- more issues have been identified as the problem has been investigated further. Exceedance of MPLs is an issue, but it has become apparent that some feed supplement products, (particularly those sold via feed merchants and/or the internet), are not correctly labelled. Therefore, the buying decisions on behalf of purchasers may be compromised;
- there are many different aspects to coordinate and bring together. The supply chain is disjointed with farmers being ultimately responsible. However, detailed knowledge of feed additives may not be uppermost in farmers' minds. Therefore, some form of guidance is required;

- the issue is more to do with compliance and responsibility rather than unnecessary expense to farmers;
- farmers have to calculate the total amount of the trace element being provided through all sources. However, advisors may not be aware of all the sources that farmers are using. Therefore, awareness across the feed chain is needed;
- it is acknowledged that the issue is significant and there is a lot of ignorance about appropriate dosing. Therefore, the Committee could usefully carry out further scoping of the issues to prioritise and quantify the risks. This will mean consideration of the appropriate regulatory models to mitigate the risks and then develop terms of reference to take forward relevant guidance;
- it was noted that many cases of over-supplementation will not impact animal health;
- there was a need to model the process (inputs and controls) as the Committee is committed to feed safety but also environmental impact and resource efficiency;
- the issue is happening at the farm gate – policing is difficult given the number of sales interactions with farmers;
- previous examples were provided and a potential solution for consideration to improve communications could be a joint letter from ACAF/VMD to trade magazines; and
- if complaints to trading standards are raised on mis-sold products these are investigated and appropriate action taken. The National Agriculture Panel had discussed the issue and considered a sampling programme, looking at the final on-farm rations. However, the proposal was not taken forward in this year's sampling plan and the main focus was complete feeds produced and sampled at the mill.

27. In summary, Members were keen to scope out details of the strategy, noting the task set would be long and difficult without a more focused approach being adopted. It was suggested that the Working Group would be chaired by Tim Riley, with input from Geoff Brown Christine McAlinden, Rob Smith, APHA, VMD and industry. The ACAF Secretariat also agreed to liaise with the FSA's Feed Delivery Team, who would take the work forward.

Action: ACAF Secretariat

Agenda Item 6 – Pet food issues - presentation

28. Mr Michael Bellingham Chief Executive of the Pet Food Manufacturers' Association (PFMA) introduced paper 17/09. He provided details on the PFMA Secretariat and stated that the PFMA was established in 1970 and had over 70 members. PFMA members account for 90% of the UK market. The Association works alongside government agencies and national experts. It has a close relationship with relevant pet organisations and charities and is a Member of the European pet food trade association – FEDIAF.

29. Mr Bellingham provided details on the UK pet food market and data on the top ten pets. Dr Monika Prenner added that there are over 50 pieces of legislation governing the manufacturer of pet food. The PFMA through FEDIAF had produced guidance documents to assist its members in understanding the legislation.

30. Mr Bellingham mentioned concerns raised by PFMA members following the UK's decision to exit the EU. Dr Prenner then outlined regulatory issues being faced by the industry and these included re-authorisation concerns (colourants, trace elements and gelling agents); EFSA guidance on Regulation No 429/2008; and the revision of labelling provisions in Regulation 767/2009.

Discussion

31. Following the presentation, Mr Bellingham and Dr Prenner commented on points raised by Members as follows:

- on the trend to buy raw pet food, legislative requirements are covered under the Animal By Products and Feed Hygiene Regulations – the risks had been acknowledged and the sector was preparing a guidance document;
- Mr Bellingham highlighted potential shortages of veterinarians, after the UK exits the EU. The ACAF Secretary said that ACAF's role could change once the UK leaves the EU. There may be challenges but also opportunities. Mr Davis stated that at a recent meeting of the Government Veterinary Services the point raised by Mr Bellingham about veterinarians was a priority. The Defra Assessor confirmed that

APHA was also carrying out work in this area. The ACAF Secretary noted that he was leading a work stream for the FSA on the domestic veterinarian workforce.

- on discussion of full ingredient listing, there were two options - by category or single ingredient listing. The industry contends that the former option avoids confusion and benefits it in terms of labelling costs. Consumers can call up the customer care-lines and ask for information on the full list.
- on undesirable substances (as is the case with other issues), pet food is covered by the same legislation as animal feed. However, the legislation contains specific provisions for pet food e.g. arsenic accumulation in fish and fish derivatives.
- as regards ACAF Paper 17/10, iron oxide is used as a colourant in animal feeds. Iron is not readily bio-available in this form to animals. Certain colourants used now require additional testing by the dossier owner.

32. The ACAF Secretary congratulated the PFMA on its efforts in drafting the code of practice on raw pet food. He noted that the FSA was interested in this issue in terms of both animal and public health. A Member of the Committee asked about raw pet food in terms of surveillance of zoonotic risks, noting that some doctors may not be asking relevant questions. The ACAF Secretary said that the relevant Department of Health and PHE² committee was aware. This was supported by the Defra Assessor who mentioned work being carried out by HAIRS³ and APHA⁴ in this area. All relevant bodies are working closely on this issue. Finally, Mr Bellingham agreed to the ACAF Secretary's request that the finalised code of Practice should be shared with ACAF.

Agenda item 7 – Matters arising from the minutes of previous meetings

Insect Protein as a potential animal feed

33. The ACAF chairman stated that at the October 2016 meeting, the ACAF Secretary agreed to liaise with ABAGri to help answer and clarify points made by a Member on whether processing would mitigate all

² Public Health England

³ Human-Animal Infections and Risk Surveillance group

⁴ Animal and Plant Health Agency

microbiological risks. On 21 April 2017 the ACAF Secretariat circulated to Members information provided by ABAGri. The ACAF Secretariat thanked ABAGri for its comments. A Member of the Committee noted that process under Method 7 – followed the requirements in the Animal By-products Regulations. The Defra Assessor thought the concern was about insect –borne bacteria rather than insect-borne viruses. The Member of the Committee was questioning whether such viruses might be concentrated. Dr Bond said that EFSA had published an opinion on insect proteins (<http://www.efsa.europa.eu/en/efsajournal/pub/4257>), which acknowledged certain knowledge gaps (including viruses). The initial conclusion on the risks arising from the consumption of insect protein is that it is not increased compared to other protein sources.

SAC Chairs

34. The ACAF chairman said that at the February 2017 meeting, he had provided details of the SAC Chairs meeting held on 22 February 2017. On 21 April 2017, the ACAF Secretariat circulated to Members a note of the meeting.

Agenda item 8 - Any Other Business

35. Mr Davies provided an update on the latest position on zinc oxide.

ACAF Secretariat

September 2017

Question and Answer

Simon Williams (Agricultural Industries Confederation) - commenting on the presentation on the feed enforcement model – said that the level of inspections was a great success but from industry point of view, any increase in inspections was not welcome in the context of earned recognition. Funding for enforcement is a concern for AIC. What happens when something goes wrong? He highlighted a recent incident where the local authority lacked resource to investigate properly. AIC is working with merchants under the UFAS stores scheme to get them to be more vigilant e.g. on the over-supplementation issue.

Mr Davies said that most AIC members should benefit from a reduced frequency of inspection as a result of earned recognition. If this was not happening then AIC (Simon Williams) should contact the FSA. In Wales funding is provided for reactive work. FSA Wales provides the resource.

A Member of the Committee said that the specific issue is considered under the programmed work FSA funds for local authorities to undertake Feed Hygiene Inspection work – earned recognition is fully applied and amends risk scores and inspection frequency accordingly. Reports of activity against a premise with earned recognition may not reflect a physical visit to premises – however, it was difficult to comment on a specific issue.