

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

71st Meeting of ACAF on 27 October 2016

Discussion Paper

Forward Work Plan & Horizon Scanning

Action: The Committee is invited to review its current work programme, agree desired outcomes and future priorities.

**ACAF Secretariat
October 2016**

ACAF FORWARD WORK PROGRAMME

Background

1. The Committee's forward work plan ACAF paper 15/21 was uploaded onto the ACAF website in 10 February 2016. As is the usual practice, the Secretariat has combined horizon scanning and future work of the Committee into one exercise. The Committee's current Forward Work Programme is in the Annex including suggestions for new work which are highlighted in green.
2. As previously agreed by the Committee Annex I has been divided into high, medium, and periodical update items. The Secretariat has listed the items in a suggested order of importance for the Committee to consider. Additionally, revised wording to the current text is shown in red bold.
3. Please note that the Secretariat has proposed that the following items (highlighted in purple) are moved from high priority to medium priority:
 - Proposed revision of the ACAF Review of On-Farm Feeding Practices;
 - Recommendations from the Food and Veterinary Office (FVO) audit to UK on feed law enforcement.
4. A Member has also suggested that there is a lot of information on the potential of algae as a future animal feed source and would like an update on the current state of play. Please can you consider if you agree with this suggestion.
5. Another Member has suggested that in view of Brexit, the following item should be promoted to a higher priority (highlighted in orange):
 - Alignment of National and EU Feed legislation – highlighted in purple.
6. In addition, the Secretariat has suggested that the Committee may wish to review its advice provided in 2001 on the feeding of fish meal to farmed animals. The Committee will recall at its June 2016 meeting Professor Glencross, Professor for Aquaculture Nutrition at the University of Stirling provided Members with details of an on-going project that the University of Stirling was undertaking with industry across the UK, looking at the management of the use of avian protein products for use in the salmon industry. In the question and answer section, Mr Toby Parker (United Fish Industries) provided some additional information on fishmeal. With the Committee's agreement the Secretariat proposes to ask Mr Parker to provide a presentation at a future meeting, as part of a review of its advice on fishmeal.
7. Other Members of the Committee have provided the following comments on the revised forward work plan as described below:

- ACAF Review of On-Farm Feeding Practices. Two Members agree with the suggestion that this item is moved to a lower category either medium or periodical updates. One Member has asked if the item could be listed as ‘On-Farm Feeding Practices’ to cover any developments in this area i.e. not just the ACAF review. The other Member has commented that it is important to constantly review this document (perhaps maintaining an evolving document off-line) in order to make future reviews easier;
- Recommendations from FVO audit. Since there remains an outstanding issue a Member of the Committee has asked whether this item should be moved?. Another Member agrees with moving the FVO recommendations to a lower priority status;
- medium priorities are issues which ACAF considers regularly and hence should be the main list and will include all the main topics. There is obviously overlap with ‘Periodical Update Issues’ and there is room for some rationalisation. For example ‘Microbiological Issues’ and ‘Outcome of Review of SAC’s’ are medium priorities yet could be listed under Periodical Updates. Suggest this needs discussion. ‘Emphasis on reduction in Food Waste ‘ – a medium priority - has yet to be considered in general terms but under this topic the Committee has discussed feed from former foods and adventitious packaging material. The member has suggested that the topic is labelled as ‘Surplus food as animal feed’. The rationale for the suggestion is that the revised title would cover food waste, all the available former foodstuffs. packaging and feed safety; and
- in terms of the ‘medium’ and ‘periodical update’ categories, the Committee has discussed previously the need for separation of these. In many cases it is difficult to define the relative importance of the topics listed. It is important that we do monitor activity in all of them as things can happen very quickly and we need to be able to react and upgrade the status to high priority. The Member has suggested that the two sections are combined.

Secretariat Recommendations

8. Based on the above, and subject to the Committee’s agreement the Secretariat would suggest that the amendments shown in the Annex and described below are made to the Committee’s forward work plan:

The following items are demoted (shown in purple) from their current position:

- Proposed revision of the ACAF Review of On-Farm Feeding Practices;
- Recommendations from the Food and Veterinary Office (FVO) audit to UK on feed law enforcement.

The following item should be promoted to the medium section (shown in orange):

- Alignment of National and EU Feed legislation.

New work items for consideration by the Committee (shown in green)

- Conclusions of ACAF on the feeding of fish meal to farmed animals

Action

9. The Committee is invited to review its current work programme, agree desired outcomes and future priorities.

**ACAF Secretariat
Food Standards Agency
October 2016**

ACAF Forward Work Programme

Introduction

The Committee is committed to taking a proactive approach to ensure developments in animal feed and feed safety are identified and prioritised as appropriate. Therefore this is a living document which can be amended to take account of changing priorities as new issues arise or the urgency of existing priorities change due to impacts on feed safety.

High Priority issues. ACAF to consider proactively based on emerging and current issues with high and/or immediate impact on feed safety and short term policy issues and strategic objectives for FSA and agricultural departments. Considerations include short term uncertainty risks, media interests and consumer perception.

Topic	Progress	Expected Output
Proposed revision of the ACAF Review of On-Farm Feeding Practices.	<p>A subgroup of the Committee was tasked to revise the Committee's Review of On-Farm Feeding Practices which was published in September 2003 and report back to the full Committee. During 2014 and 2015 the sub-group worked on revising the document feeding back to the main Committee at regular intervals. Additionally, the sub-group liaised with colleagues in Defra, VMD, the FSA and industry to ensure that the revision took account of developments.</p> <p>The final review document was uploaded on to the ACAF website in May 2016. The Committee agreed that the</p>	To review and update the Committee's 2003 report on on-farm feeding practices identifying developments since the report was published.

	<p>document should be reviewed periodically.</p>	
<p>Recommendations from the Food and Veterinary Office (FVO) audit to UK on feed law enforcement.</p>	<p>The Committee was updated in December 2011, March, June and September 2012 of the recommendations of FVO audits on the enforcement of feed legislation and work the Agency and other control authorities were carrying out to address the recommendations.</p> <p>The FVO conducted an audit of UK feed enforcement in January 2014. The official report and recommendations have been received and a formal UK response was sent to the Commission in September 2014.</p> <p>During the period 8 -15 June 2015, the FVO carried out a general follow-up audit to UK. This was a desk based review of progress on the implementation of all outstanding recommendations from recent audits in the UK including the feed audit in January 2014. One of the outstanding recommendations from that audit was - to ensure that the labelling of oils and fats is not altered from technical grade into feed grade as required by Article 5(2) of</p>	<p>To ensure that the proposed actions to implement the recommendations of the FVO are proportionate and protect the consumer.</p>

	<p>Regulation (EC) No 183/2005.</p> <p>However, there remains an outstanding issue about the use of the term ‘pre-animal feed’ by one company, which is not permitted. The FSA has held meetings with the relevant industry sector to resolve the issue and provided further evidence to DG Health and Food Audits and Analysis (formerly FVO) in May 2016 showing revised wording. Confirmation from the lead auditor on whether the recommendation is now considered met is awaited.</p>	
Refuse Derived Fuel Market	<p>The Director General of the Grain and Feed Trade Association (GAFTA) has asked the FSA to consider the issue of Refuse Derived Fuel (RDF) Markets and the potential risks to the safety of animal feed. The potential risks are:</p> <ul style="list-style-type: none"> • lack of legislation in storage of RDF / legislation not keeping up with the new market; • transport and storage of baled RDF at ports / no zoning; • health and safety issues; • chemical and microbiological cross contamination; and • increased pest and vermin in RDF 	To provide recommendations and advice on potential impacts on feed safety as appropriate.

	<p>storage areas.</p> <p>The ACAF Secretariat has invited GAFTA and the Environment Agency) to provide a presentation at a future ACAF meeting.</p> <p>A presentation was made at the Committee's 17 February 2016 meeting, where the Committee agreed to make formal recommendations on how the issue should be addressed. The Committee will receive a further presentation on this subject at its October 2016 meeting.</p>	
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Medium Priority issues - ACAF to respond to developments and consider regularly. This will be based on emerging and current issues with potential increasing impact on feed safety along with medium term policy issues and strategic objectives for FSA and agricultural departments. Considerations for determining medium priority include medium term uncertainty of risks, media interests and consumer perception.

<p>Conclusions of ACAF on the feeding of fish meal to farmed animals</p>	<p>In 2001, the Committee was asked by the Food Standards Agency for information and advice on the nutritional and other benefits of including fish meal and oil in animal feed (with the cost of any controls), set against any human and animal health risks. The Committee was made aware of the urgency of the matter: by this time it was expected that decisions would be imminent on whether the European</p>	<p>To provide recommendations and advice on potential impacts on feed safety as appropriate.</p>
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	<p>Community should extend or amend its temporary ban on feeding processed animal protein, which includes fish meal in feed for ruminant animals, beyond 30 June 2001.</p> <p>The Committee discussed the subject at its meeting on 28 February 2001 and concluded its discussion on 2 May 2001. The Committee's conclusions were published on the ACAF website on 15 May 2015.</p>	
Trace element status of Feeds	<p>There is some concern that changes in feed legislation leading to the manufacture of animal feed with lower levels of certain trace elements might lead to inadequate nutrient supply to humans. Key issues previously voted at the European Commission included maximum limits for iodine and selenium. The Committee received a presentation from an ACAF Member and a representative from the University of Surrey on iodine in feed at its October 2013 meeting.</p> <p>In 2013, the maximum content of organic selenium was reduced; albeit maintaining the maximum permitted limit (MPL) for total selenium. This may</p>	To provide recommendations and advice on potential impacts on feed safety as appropriate.

	<p>impact the UK human population regarding dietary deficiencies of this essential trace element.</p> <p>In 2015, the MPLs for iodine were maintained (with intervention from UK) whilst referencing lower recommended use levels.</p> <p>In 2016, reductions in maximum limits for zinc were introduced for some animal species.</p> <p>Upcoming Standing Committee discussions on maximum limits are expected for the trace elements; copper, iron and manganese.</p>	
<p>Food/feed security:</p> <p>a) climate change and the impact on feed production;</p> <p>b) animal production including feeding systems and the effect on the environment; and</p> <p>c) global demand for animal derived foods and prices for primary production.</p>	<p>During 2010, the Committee received presentations from a representative from the University of Reading/Deputy Chief Scientific Advisor to the Department for International Development (DfID) and another representative from the University of Reading on items (a) and (b), respectively. The Committee agreed to keep these items on its workplan.</p> <p>Item (c) stems from a GACS horizon scanning workshop held on 24 June 2009.</p>	<p>To identify and address potential feed safety issues arising due to food/feed security considerations and provide recommendations as necessary.</p>

	<p>The Committee agreed it would like to explore this area further at a future meeting. It was agreed that the Secretariat should arrange for presentations to cover: (a) the UK position; (b) the European position; and (c) the worldwide position. The Committee envisages that the proposed presentations will help it to determine its formal stance on these issues.</p> <p>In October 2014 Members received a presentation from the Chairman of the AIC's Sustainability Committee. The Committee agreed to revisit the area of sustainability at a future meeting.</p>	
Feed Safety – Potential Gaps	<p>In June 2011, the Committee was asked to consider potential safety gaps in the feed sector. It agreed to consider in further detail the following:</p> <ul style="list-style-type: none"> • identification of feed businesses; • awareness/competence of feed business operators (FeBOs); and • imports. <p>The Committee explored the three areas during 2012 and 2013 including presentations from industry organisations (e.g. the Agricultural Industries Confederation and the British Society of</p>	To identify potential gaps in feed safety and provide recommendations to address the gaps identified.

	<p>Animal Science on work they are doing on the awareness and competence of FeBOs). At its May 2013 meeting the Committee considered the conclusions it had reached during its exploration of potential safety gaps in the feed sector. These were published on 10 December 2013.</p> <p>http://acaf.food.gov.uk/papers/reviewgaps</p>	
<p>The feeding of farm livestock to improve the quality of human food (milk, meat, eggs, fish). Examples include:</p> <ul style="list-style-type: none"> - enhancing the selenium content of livestock produce; - enriching foods with polyunsaturated fatty acids (PUFAs) including long chain n-3 PUFA; - developing foods with reduced concentrations of saturated fatty acids; 	<p>The Committee first considered this issue in 2004-2005. A horizon scanning workshop organised by the GACS took place in June 2009 and was attended by a number of ACAF Members. ACAF was requested to take forward the ideas discussed. At ACAF's September 2009 meeting a Member of the Committee agreed to carry out a literature review of research being carried out in this area. The report of the review was circulated to Members on 27 November 2009 and the key areas of research summarised.</p> <p>At its September 2012 meeting, Members were informed of developments on iodine and vitamin D. A Member of the Committee agreed to provide details of these developments to Members, which was circulated on 11 October 2012.</p>	<p>To note developments, including industry and public opinion, and to provide considered and substantiated guidance to help shape FSA policy.</p>

	This area will be revisited when significant developments occur.	
Emphasis on reduction in food waste	<p>Yet to be considered in general terms.</p> <p>The Committee is already aware of work being done in respect of the presence of adventitious packaging material in feed produced from surplus food.</p> <p>At its February 2014 meeting, Mr Paul Featherstone the newly-elected Chairman of the United Kingdom Former Foodstuff Processors Association (UKFFPA) provided a presentation on the work of the UKFFPA and its European equivalent, the European Former Foodstuff Processors Association (EFFPA). Members were interested in the Association's work which dovetails with initiatives on minimising packaging material in feed produced from former foodstuffs.</p> <p>The European Commission published its Circular Economy Package in December 2015. At its June 2016 meeting Alexander Döring the Secretary General for the European Feed Manufacturers' Federation (FEFAC) provided the Committee with FEFAC's views on the</p>	To provide comments to help to inform the FSA position on such initiatives.

	<p>recent EU Commission Communication on the Circular Economy and its potential impact on and implications for feed safety management along the feed supply chain. The Committee empathised with the issues raised during the presentation.</p>	
Forge closer links with other Advisory Committees and tackle issues of common interest.	<p>ACAF will continue to take opportunities to develop links with other SACs in respect of cross-cutting issues.</p> <p>ACAF Members and the Secretariat continued to work with the Advisory Committee on Microbiological Safety of Food (antimicrobial issues) and the Advisory Committee on Novel Food and Processes (GM Feed).</p>	To identify opportunities for working with other SACs to ensure potential feed safety issues in discussions by other SACs are identified and addressed appropriately.
Microbiological issues	<p>At its September 2011 meeting the Committee was asked to consider whether the policy adopted by the Food Standards Agency in relation to Salmonella in feed was appropriate. The Committee endorsed the line taken by UK officials in negotiations where a Hazard Analysis Critical Control Point (HACCP)-type approach, as considered by EFSA and as set out in the UK Code of Practice, would be preferable to amendment of the Feed Hygiene Regulation.</p>	To note developments, including industry and public opinion, and to provide considered and substantiated guidance to help shape FSA policy

	In light of comments by some Member States that the European Commission should consider a harmonised EU Salmonella strategy, ACAF Members may be asked for their views should the exercise go forward.	
Biostimulants	<p>A Committee Member has suggested that ACAF should explore this issue further. Plant biostimulants contain substance(s) and/or micro-organisms whose function when applied to plants or the rhizosphere is to stimulate natural processes to enhance/benefit nutrient uptake, nutrient efficiency, tolerance to abiotic stress, and crop quality.</p> <p>The ACAF Secretariat proposes to invite an expert to provide a presentation at a future ACAF meeting.</p>	To note developments, including industry and public opinion, and to provide considered and substantiated guidance to help shape FSA policy
Outcome of Review of Scientific Advisory Committees and follow-up action	The Cabinet Office (CO) requires all government departments to review their Non-Departmental Public Bodies (NDPBs) at least once every three years in order to increase transparency and accountability, reduce duplication of activity, and to discontinue activities which are no longer needed. The FSA will review all six of its SACs as a cluster to provide efficiencies in delivering the review. It will use common	To note updates and provide comments if desired.

	<p>channels and sources of evidence and will consider how the SACs work with each other, and any gaps and overlaps in their functions and delivery.</p> <p>Following the review there may be follow-up work requiring assistance from Committee Members.</p>	
Training	<p>Members have identified that there is a lack of any formal training available, other than a specific short HACCP course, for individuals in the animal feed sector who have feed/food safety roles. The Committee intends to carry out a formal review on this area with a view to providing recommendations.</p>	<p>To identify and address potential opportunities for training and provide recommendations as necessary.</p>
Feed optimisation	<p>The Committee is to consider how supplemental feed (for ruminant) and principle diet feed (monogastrics) could be optimised to minimise economic inputs without compromising food safety.</p>	<p>To note developments, including industry and public opinion, and to provide considered and substantiated guidance to help shape FSA policy.</p>

Periodical update - items for the Committee to be aware of that have long term impacts on feed safety that may or may not change rapidly over a period of time. The following considerations for determining periodical updates will include long term uncertainty of risks, media interests and consumer perception.

GM issues including future developments	The Committee receives regular update reports from the Secretary on EU developments; these	To note developments, including industry and public opinion, and to provide
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<p>in biotechnology (e.g. use of second generation GMOs) and possible links with GM nutritional work.</p>	<p>include future developments in biotechnology.</p> <p>The issue of asynchronous approvals of GM varieties and its future impact on the security of feed supply has been brought to the attention of the Committee and is being monitored by the Secretariat.</p>	<p>considered and substantiated guidance to help shape FSA policy</p>
<p>Feed additive developments and issues.</p>	<p>An information paper was prepared by the Secretariat for ACAF's March 2008 meeting. The Committee considered this topic again at its June 2011 meeting. It noted that the assessment of applications for the re-authorisation of feed additives according to Article 10 of Regulation 1831/2003 had started. The Secretariat will keep the Committee informed of developments.</p> <p>Committee Member Geoff Brown will provide the Committee with a presentation on feed additives at its October 2016 meeting.</p>	<p>To note developments, including industry and public opinion, and to provide considered and substantiated guidance to help shape FSA policy</p>
<p>Feed Incidents and related issues.</p>	<p>In June 2012 the Committee received a presentation from the Department of Agriculture and Rural Development on Feed Incident Management in Northern Ireland from an enforcement perspective. It outlined the level of preparedness in Northern Ireland for the handling of feed related incidents, including contingency planning, and risk assessment activities. The Committee was encouraged by the arrangements in place.</p>	<p>To maintain safety of consumers by ensuring that systems in place to deal with incidents are robust and mitigate risks within a timely response.</p>

<p>Updates on BSE and TSE developments.</p>	<p>An update on TSE and Meat and Bone meal (MBM) issues was provided by an official from Defra at the Committee's December 2008 and June 2011 meetings.</p> <p>At its June and September 2011 meetings, Members agreed to receive updates and monitor developments in respect of the European Commission's draft proposal to establish new criteria for feeding non-ruminant processed animal protein (PAP - excluding fishmeal) to non-ruminants of a different species.</p> <p>The Committee also received a presentation from another official from Defra on an update of EU Animal By-Product controls at its meetings in December 2009 and September 2011.</p> <p>Members were provided with an oral update at the September 2012 meeting.</p> <p>Members agreed that this item should remain on its work plan and be periodically reviewed.</p>	<p>To note developments, including industry and public opinion, and to provide considered and substantiated guidance to help shape FSA policy</p>
<p>Nano-technology</p>	<p>A House of Lords Select Committee paper on nano-technology was published in January 2010. The paper contained little information on feed issues. At its September 2012 meeting, Members agreed to the removal of this issue from its forward work plan. However, Members have noted that this issue is much discussed in the food sector and that ACAF</p>	<p>To be aware of updates and discussions affecting feed safety. To provide recommendations and comments on feed safety issues as necessary.</p>

	<p>should fully understand the potential pros and cons of this technology. This is particularly relevant as the definition of nano-particles as applied to food use has been very contentious.</p> <p>Yet to be discussed.</p>	
Antimicrobial Resistance	<p>The Committee received a presentation on this issue in September 2012. It agreed this topic was complex and wished to discuss it in more depth at a future meeting, to explore whether antimicrobial resistance was a significant issue for animal feed.</p> <p>The Committee received a presentation from the Chief Executive of National Office of Animal Health (NOAH) on work the organisation had carried out on antimicrobial resistance with regard to the use of veterinary medicines. The Committee noted that although it has a peripheral interest in the subject, it was an important area and wished to be kept informed of developments.</p> <p>At its May 2013 meeting a Member of the Committee informed ACAF Members that they had been invited to be a Member of an Advisory Committee on Microbiological Safety of Food Working Group on antimicrobial resistance. The Member agreed to keep ACAF Members informed on the Working Group's discussions. The ACAF Member has attended five meetings of the working group providing feedback including requests for</p>	To be aware of updates and discussions affecting feed safety. To provide recommendations and comments on feed safety issues as necessary.

	information from these meetings at subsequent ACAF meetings.	
Alignment of National and EU Feed legislation	<p>The Government has set a clear aim to reduce the overall burden of regulation. To this end and under the auspices of the Red Tape Challenge, the national animal feed regulations will be simplified by consolidating the four main pieces of legislation into two. The following came into force on 6 April 2015:</p> <p>(i) Animal Feed (Composition, Marketing and Use) (England) Regulations 2015 (SI 2015 No. 255) http://www.legislation.gov.uk/uksi/2015/255/contents/made; and</p> <p>(ii) Animal Feed (Hygiene, Sampling, etc. and Enforcement) (England) Regulations 2015 (SI 2015 No. 454) http://www.legislation.gov.uk/uksi/2015/454/contents/made</p> <p>However a further amendment is required on (i) which is expected to be finalised in 2016.</p>	To note developments, including industry and public opinion, and to provide considered and substantiated guidance to help shape FSA policy
Feed issues relating to organic production.	<p>The Committee received an update on UK negotiations on organic farming in December 2011. It agreed that this was an important issue and requested it be kept informed of developments.</p> <p>At its October 2014 meeting the Committee received a presentation from a Defra official on</p>	To be aware of developments in relation to organic production providing as necessary recommendations to take account of potential feed safety issues.

	proposals on organic products and labelling of organic products. Members agreed to provide comments to Defra on the Commission proposals.	
<p>Biofuels:</p> <ul style="list-style-type: none"> possible impact on the availability and cost of widely used selected feeds; and the safety and use of feed co-products from the production of biofuels. 	<p>The Committee has considered this subject area in depth and its position paper was published on 30 April 2008.</p> <p>At its March and June 2010 meetings the Committee received update presentations on biofuels and agreed that its position paper should be revised and adapted to take account of quantifiable data and new developments.</p> <p>The Committee updated its position paper on biofuels at its September 2011 meeting and agreed to publish a revised document, which is available at: http://acaf.food.gov.uk/papers/biofuels</p>	To be aware of developments in relation to biofuels production providing as necessary recommendations to take account of potential feed safety issues.
Brominated flame retardants (BFRs)	The Committee received a presentation on this issue at its December 2011 meeting. Following the meeting a project on BFRs in food and feed took place. This is now complete and a draft report received. Initial conclusions include that BFRs occur in feed but, on the basis of limited investigation, their presence is probably as a result of low background environmental contamination.	To be aware of developments in relation to brominated flame retardants providing as necessary recommendations to take account of potential feed safety issues.
New Developments in feed for livestock species (including aquaculture).	The Committee will continue to be updated on developments and will be asked for advice as required.	To be aware of new developments in feed manufacture and novel techniques and to make recommendations on potential safety issues.

	<p>The Committee received a presentation on work by FERA on insect protein as potential animal feed at its October 2013 meeting. The Committee was keen to receive further updates on this work.</p> <p>The Committee received a presentation at its February 2014 meeting on work being carried out by The National Institute of Agricultural Botany (NIAB) to develop a new type of wheat which could increase productivity by 30% offering greater yields. It asked for further updates on the work being carried out by NIAB.</p> <p>In May 2014 the Committee received a presentation on new plant breeding techniques. The Committee noted that clarity was required on the legislative aspects of these techniques. It was interested in the research and wished to be kept informed of developments.</p>	
EU developments – including providing advice on UK negotiating lines.	The Committee receives EU development updates at every meeting and provides input to the UK delegation on a range of issues.	To note developments, including industry and public opinion, and to provide considered and substantiated guidance to help shape FSA policy
Work of the European Food Safety Authority (EFSA), including opinions on additives and contaminants relating	The Secretariat will continue to draw relevant EFSA Opinions and documents to the attention of ACAF for discussion.	To note updates and maintain links with EFSA, providing comments as necessary.

to animal feed.		
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ACAF Secretariat

October 2016