DRAFT MINUTES OF THE SIXTY FOURTH MEETING OF ACAF HELD ON 9 MAY 2014

Present:

Chairman	Dr Ian Brown
Members	Ms Angela Booth Ms Ann Davison Professor Stephen Forsythe Mr Peter Francis Professor Ian Givens Dr Wendy Harwood Mrs Chris McAlinden Dr David Peers Dr Tim Riley Mr Edwin Snow Mrs Stephanie Young
Secretariat	Mr Keith Millar (Secretary) – Food Standards Agency Miss Mandy Jumnoodoo – Food Standards Agency Dr Ray Smith – Food Standards Agency
Assessors	Mr Will Francis – Food Standards Agency Mrs Hilary Neathey – Food Standards Agency, Wales Ms Martha Martin – Food Standards Agency, Scotland Mr Stephen Wyllie - Defra Assessor
Speakers:	Mr Phil Sketchley – Chief Executive National Office of Animal Health Mr Chris Gordon – British Equestrian Trade Association Ms Claire Williams –British Equestrian Trade Association Mr Ron Cheesman – Food Standards Agency

1. The Chairman welcomed delegates to the 64th meeting of ACAF and reminded them that there would be an opportunity to ask questions at the end of the meeting.

2. Apologies for absence were received from Mr Tim Brigstocke, Dr Glenn Kennedy (Northern Ireland Assessor) and Janis McDonald (Veterinary Medicines Directorate).

3. The ACAF Chairman said this was the last meeting for Tim Brigstocke. He thanked Mr Brigstocke for his commitment and valuable contribution whilst on the Committee, and passed on the Committee's best wishes for the future.

Agenda Item 1 – Declaration of Members' Interests

4. Members of the Committee were asked to declare any relevant changes to their entries in the Register of Members' Interests, or any specific interest in items on the agenda. Mr Edwin Snow confirmed that he had been appointed as an adviser for the Universal Feed Assurance Scheme (UFAS). Ms Booth said that she chairs two Agricultural Industries Confederation (AIC) committees – AIC Feed Executive and FEMAS Steering Group.

Agenda Item 2 – Draft Minutes of the Sixty third Meeting (MIN/14/01)

5. The minutes were adopted.

Agenda Item 3 – European initiatives to monitor antibiotic resistance and usage and industry perspectives for the future (ACAF/14/13)

6. Mr Phil Sketchley (Chief Executive of NOAH) introduced ACAF paper 14/13 on European initiatives to monitor antibiotic resistance and usage, and industry perspectives for the future. Mr Sketchley said that NOAH represents the UK animal medicine industry: its aim is to promote the benefits of safe, effective, quality medicines for the health and welfare of all animals.

7. Mr Sketchley explained that in terms of antimicrobial resistance, industry wished its products to remain as effective for as long as possible through promotion of, and adherence to, responsible use by vets and farmers. An appropriate regulatory climate was required to encourage industry to continue to invest in research and development in animal health. However, the industry needed to have confidence in the return of investment as there was a high cost in developing and marketing a livestock medicine. Between 2006 and 2011 there has been an average increase of 25% in cost to register new animal health products.

8. In September 2013 the UK Government issued its 5 year strategy on antimicrobial resistance (AMR). This strategy is currently being reviewed by the UK Parliament Science and Technology Committee. Mr Sketchley commented that internationally, there is little control on AMR. Additionally, human resistance problems are related to human clinical use and not through the use of antibiotics in animals. Recent scientific papers have indicated that the there is no direct link between veterinary use and antibiotic resistance in humans and that antibiotic resistance in veterinary pathogens is rare. However, more research is required on resistance surveillance and on transmission pathways. Mr Sketchley said that the Responsible Use of Medicines in Agriculture Alliance (RUMA) in response to the UK Government's Five Year Antimicrobial Resistance (AMR) Strategy had produced an action plan for the

livestock sector which will be reviewed on a quarterly basis. Mr Sketchley expressed concerns that a full range of antimicrobials and a range of routes of administration should remain available for use in veterinary medicine to help prevent resistance and treat the animals appropriately. Additionally, it was very unlikely that novel new antibiotics for veterinary purposes would be available in the near future because of regulatory uncertainty and use issues. It was therefore important to use currently available products properly. However, obsessive use of the 'precautionary principle' had the potential to negatively impact innovation and animal health and welfare.

9. Mr Sketchley provided Members with an overview of the review of the EU regulatory framework for veterinary medicines. He said that the review was already underway and that antimicrobial resistance implications in both animals and humans were being considered. He then explained that proposals to ban the use of prophylactic use of antibiotics had been submitted from various sources including non-government organisations and UK Members of Parliament. The view submitted by RUMA and supported by NOAH is that therapy, control and preventive treatment is needed in the veterinary sector. Additionally NOAH and IFAH[1] have suggested a number of proposals to reduce antimicrobial resistance. These include enhanced surveillance, initiatives to promote innovation, the use of new and existing classes of antibiotics strategically, minimisation of preventative use and the tightening of the regulatory framework to ensure that the cascade system works properly.

10. Mr Sketchley then provided details of surveys carried out by NOAH in 2006, 2009, and 2013 via the Institute of Grocery Distribution on consumer perceptions on the use of animal medicines in the food chain. These showed that consumers had faith in UK farmers. However, some consumer perceptions were inaccurate; for example, a majority of consumers still believed that the use of growth hormones in the EU was still permitted – these have been banned since the early 1980s. However, more consumers are demanding information on the origin and conditions of how their food was produced. Finally, Mr Sketchley referred Members to two videos produced by NOAH:

    - consumer film – Animal Medicines in Food Production – Challenging Consumer Myths – http://youtu.be/1gluroDR8Ak; and
    - industry film – Animal Medicines in Food Production – the food Industry Perspective – http://youtu.be/UWihGoyJgBI

Discussion

11. A Member of the Committee said that although ACAF had a strong interest in antimicrobial resistance, a number of expert groups were also considering this issue

[1] International Federation for Animal Health

and that it was unlikely that the development of a totally new antibiotic for humans would occur in the near future. The Member asked Mr Sketchley for clarification on the possible development of new antibiotics for use in animals. He replied that this referred to antibiotics that are currently approved for human use. The Member further commented on Mr Sketchley's reference to reports on the non-transfer of antibiotic resistance through animal husbandry when there were many other reports, including EFSA opinions, on the transfer during poultry production and the previous use of enrofloxacin. Mr Sketchley noted that there was some evidence of such transfer in another European country where antibiotic sprays had been used inappropriately.

12. The ACAF Chairman said that there had been no research or development of new classes of antibiotics for the last 20 years. A Member of the Committee said that consumers were concerned about antimicrobial resistance and about balancing the benefits of, and need for, antimicrobials in farming. The contribution to resistance from the animal sector might be smaller but human health should have priority. A Member of the Committee advocated that more research in the area of antimicrobial resistance was required. Following a question on whether there was funding available for the development of vaccines for tuberculosis, Mr Sketchley said that a number of new vaccines products were being developed, and that the use of antibiotics had been on the decrease in favour of vaccines. Another Member of the Committee commented that in the 2013 survey there had been an increase in consumer perceptions on the use of animal medicines in the food chain. Mr Sketchley said that there had been some areas where perceptions had improved since the earlier surveys and that the Food Standards Agency had been recognised as a trusted organisation by putting the consumer first and providing a good source of information.

13. Despite biocides being outside the remit of NOAH, Mr Sketchley agreed to check whether there will be any new restrictions or withdrawal of products as a result of the review of the Biocidal Product Regulation (BPR, Regulation (EU) 528/2012). In response to a question on other methods of administration other than feed, Mr Sketchley suggested that this should be put to the Veterinary Medicines Directorate.

Action: NOAH

14. A Member of the Committee asked if there was any evidence to support the view that there is no correlation between antimicrobial resistance in animals and in humans. Mr Sketchley said that all the available evidence suggests that the use of antibiotics in animals had little or no impact on the incidence of antibiotic resistance in the treatment of human infections. The Chairman added that action undertaken by organisations such as RUMA had attempted to bring evidence of this to the attention of relevant bodies and the public. Mr Sketchley asked if Members of the Committee

found that there were issues missing from the RUMA strategy that these should be bought to the attention of the Secretary General, John FitzGerald. The ACAF Secretary highlighted work being undertaken by the Food Standard Agency and the Veterinary Medicines Directorate, and agreed to keep the Committee informed of developments.

Action: Secretariat

Agenda Item 4 – Horse Feed Issues (ACAF/14/12)

15. Ms Claire Williams introduced ACAF paper 14/12 on horse feed issues. She explained that the British Equestrian Trade Association (BETA) represents over 800 companies active in supplying over 70% of the consumer goods sold to the equestrian community. BETA is a company limited by guarantee and owned by its member companies and is unique as the only body representing solely the equine trade sector in the world. The Association represents the equestrian manufacturing, distribution and retail trade in the United Kingdom. BETA members are primarily those involved in the manufacturing or supply of the equipment that goes in, on or around the horse or rider. BETA is particularly strongly represented in the feed sector, with its members responsible for the production of approximately 95% of feed and supplements. Ms Williams provided an explanation of the structure of the Association.

16. Ms Williams's colleague Mr Chris Gordon informed Members of the work that BETA carries out on behalf of its members. This includes lobbying and representation, business development, negotiated member services and training, arbitration, promotion and export funding for the industry and promotion of riding and safety. Mr Gordon explained that the equine feed industry was diverse and produced an estimated 200,000 tonnes of feed per annum. The Association lobbies on legislation matters to ensure that the trading and regulatory environment does not hinder BETA's businesses. BETA sits on a number of national and European bodies to ensure that the interests of its companies are taken into consideration when forming policy or making decisions as to the rules under which equine sports operate. Equine feed manufacturers are faced with two sets of regulations namely legislative and sporting. Sporting is further divided between racing and the international body for all Olympic equestrian disciplines (FEI[2]).

17. Current issues for equine feed producers include claims and labelling. However, with the assistance of the Food Standards Agency, guidance on these issues has been prepared which helps members' understanding of, and adherence to, the legislative requirements. With respect to PARNUTS[3] legislation BETA is working to update a

[2] Federation Equestre Internationale
[3] particular nutritional purposes – Directive 2008/38/EC

few existing PARNUTS authorisations. BETA has also established a reporting system for mycotoxins (e.g. T2 and HT2) found in certain raw materials. Mr Gordon said that there were relatively few medicated feed safety implications for horses.

18. Finally, BETA sought ACAF's views on the following issues: i) regulatory overlap between the Veterinary Medicines Directorate and the FSA; ii) interpretations across the European Union, as some markets have their own rulings on certain substances; and iii) interpretations across enforcement officers within Trading Standards as different interpretations can cause some conflict and confusion.

Discussion

19. In response to a question from the ACAF Chairman on advice that BETA required from ACAF, Ms Williams said that the Association had received clear information from the FSA. Dr Smith (ACAF Secretariat) acknowledged the valuable support and help received from BETA. He asked whether BETA had any additional issues under PARNUTS. Mr Gordon said that BETA would consider whether it wished to submit further PARNUTS applications.

20. In terms of clarifying trading standards issues, a Member of the Committee confirmed that under EU legislation horses are considered to be food producing animals. The Member then noted that there may be times when advice from trading standards officers on claims can be ambiguous. In such cases resolution can be reached via regional fora such as the National Agricultural Panel. Ms Williams asked how the advice provided at such meetings would be relayed back through to BETA. The ACAF Secretary noted that Members of the Agency's Animal Feed, TSEs and Animal By-products Branch attended such meetings and agreed to ensure answers to questions raised would be reported back to external stakeholders.

Action: Secretariat

Agenda Item 5 – New Plant Breeding Techniques (ACAF/14/11)

21. Dr Wendy Harwood (ACAF Member) introduced ACAF paper 14/11 on new plant breeding techniques. She explained that the availability of variation in plants has been important to 'traditional' plant breeders and that there are a number of methods that have been introduced over a number of years to increase the pool of variation. Sources of variation for crop improvement have been created via tissue culture induced variation and more commonly using mutation breeding. More recently, new plant breeding technologies (NPBTs) have been developed that provide new sources of variation.

22. NPBTs use biotechnology and molecular approaches that allow precise modification of a plant's genetic material. There are a number of NPBTs including

cisgenesis/intragenesis where the DNA introduced comes from the same or a cross-compatible species. Dr Harwood said that in a survey carried out in 2012 to determine the extent to which plant breeders were adopting NPBTs and to examine the development of commercial products, between 2 and 4 out of the seventeen plant breeding companies who responded used the various NPBTs available. Some crops developed using the techniques had reached an advanced commercial development stage. However, an uncertainty regarding the regulatory status and possible high regulatory costs were given as reasons for limiting the use of the technologies.

23. Dr Harwood provided an overview of plant breeding using 'traditional' genetic modification techniques and then explained how these techniques differed from cisgenesis and intragenesis – namely in the case of cisgenesis the technique uses the same gene pool as traditional plant breeding; however, the process is quicker and does not transfer unwanted genetic material along with the desired gene. Techniques used in intragenesis technologies follow similar principles. However, a different combination of genes and promoters are allowable. An example of the possible use of cisgenesis in animal feed includes the use in barley with improved grain phytase activity which will in the long term be beneficial to the environment as animals will not excrete unused phosphorus.

24. Dr Harwood then explained that developments in targeted gene modification technologies have overcome one of the main arguments against the use of GM crops in that the effects produced are very similar to those produced by natural variation or mutation breeding. These technologies have a number of other potential applications; for example, in medicine. One of the most recent tools for targeted gene modification is the CRISPR4/Cas9 system. The advantages of this tool is that it is easy to design, it is cheap and straightforward and has been shown to have huge implications for crop improvement in a range of crops, e.g. rice, wheat, maize and barley.

Discussion

25. In response to a question from a Member of the Committee on whether any allergens had been created through the new technologies, Dr Harwood said that extensive work had been carried out on GM crops to look for the presence of allergens but nothing had been found. In response to a question on how it could be determined that the new transfered gene will function in the target plant, Dr Harwood said that in practice, candidate plants would be assessed and the most promising selected. A Member of the Committee noted that the CRISPR/Cas9 tool had potential in medicine; for example, in the treatment of cystic fibrosis. Another Member of the Committee asked whether development of phytase-enhanced barley would be one of

[4] clustered regularly interspaced short palindromic repeats

the first feeds to be marketed. Dr Harwood responded that other products might be marketed before this.

Agenda Item 6 – Food and Veterinary Office (FVO): Audit to Great Britain January 2014

26. Mr Ron Cheesman of the Agency's Feed Review Implementation Team provided an oral update on the FVO audit of UK feed law enforcement that took place in January 2014. He said that the FSA has not yet received the draft FVO report but understands it is going through its clearance process and should be received shortly.

27. The FVO has been at pains to point out that they believe that the UK has made significant progress in improving its delivery of official controls and is encouraged by the regional approach to funding which has been put in place in England which it thinks will lead to improvements in the consistency and quality of official controls. Mr Cheesman thanked all those local authorities involved in the audit for all the hard work they have put in since the last audit in 2011.

28. Mr Cheesman said that the Lead FVO auditor had shared with him the five draft recommendations contained within the report. He then explained each of these and the actions that the FSA believe will address these, adding that he welcomed comments from Committee Members.

29. The recommendations are:

No.	Recommendation
1.	To ensure that official controls are carried out by suitably experienced staff so that official controls and control duties can be carried out efficiently and effectively.
2.	To execute the official sampling according to the relevant risk criteria and to analyse the appropriate feed for the relevant parameters.
3.	To ensure that the system for verifying the effectiveness of official controls allows the identification and correction of deficiencies in the execution of the sampling and inspection programmes.
4.	To verify that the HACCP based procedures at feed operators include appropriate limits, validation and verification procedures for the critical control points identified, (notably those related to checks to measure cross-contamination with coccidiostats in feed for non-target species).
5.	To ensure that the labelling of oils and fats is not altered from technical grade into feed grade.

Discussion

30. Following a question from the ACAF Chairman, on whether ACAF should review the FVO audit report when available, the ACAF Secretary agreed that the Committee should be kept abreast of developments. He informed the Committee that as part of the work to address the recommendations, he would be having meetings with relevant stakeholders.

Action: Secretariat

Agenda Item 7 – Matters arising from the Minutes of previous meetings

VMD Antimicrobial Resistance Forums

31. A Member of the Committee noted that ACAF paper 14/16 was informative. The Member then provided an update on the ACMSF sub-group on the antimicrobial resistance meeting held on 20 March 2014. Details of the sub-group meeting will be available on the ACMSF website: http://acmsf.food.gov.uk/

Agenda Item 8 – Any Other Business

32. The ACAF Secretary reported that interviews to fill the following vacant posts on the Committee would be held shortly: veterinary science and feed materials.

33. A Member of the Committee said that they had attended a communications meeting of SAC Chairs where a request for case studies was made.

Date of the next meeting

34. The ACAF Chairman said that the next meeting would take place on 22 October 2014 in Aviation House.

Information Papers

35. The ACAF Chairman drew the Committee's attention to the following information papers:

- Implementation of Earned Recognition in the Feed Sector (ACAF 14/10)
- EU Developments (ACAF/14/14);
- Update on the work of other advisory committees (ACAF/14/15);
- Meeting summary of the VMD antibiotic Resistance Engagement Forums (ACAF/14/16).

ACAF Secretariat
July 2014