ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

Twentieth Meeting of ACAF on 25 June 2003 – Agenda Item 3

The Royal Pharmaceutical Society of Great Britain
Animal Medicines Inspectorate

Action: The Committee is invited to discuss the contents of this paper, including whether any further clarification is required, and to note that the RPSGB has suggestions for consideration which will be tabled at the next meeting.

Secretariat June 2003
The Royal Pharmaceutical Society of Great Britain
Animal Medicines Inspectorate

Background

1. At its 19th meeting on 15 April 2003 ACAF embarked on a review of feed law enforcement with presentations by four organisations responsible for ensuring compliance with feed law or feed quality standards namely:

   • the European Food Safety Inspection Service (EFSIS);
   • Local Authorities Co-ordinators of Regulatory Services (LACORS);
   • the Animal Medicines Inspectorate of the Royal Pharmaceutical Society of Great Britain (RPSGB); and
   • the Product Authentication International (PAI).

Purpose

2. This paper summarises and elaborates upon the presentation given at the nineteenth meeting of ACAF by John Millward of the RPSGB. The factual material contained in this paper was provided by the RPSGB.

The Royal Pharmaceutical Society of Great Britain

3. The RPSGB is the registration and professional body for pharmacists. It also has a statutory duty to enforce sections 52 and 58 of the Medicines Act 1968 and is named as the enforcement authority for several pieces of legislation including:

   • The Medicines (Exemptions for Merchants in Veterinary Drugs) Order 1998;
   • The Medicated Feedingstuffs Regulations 1999; and
   • The Feedingstuffs (Zootechnical Products) Regulations 1999.

4. Businesses carrying out activities regulated by the legislation listed above are required to be approved and regularly inspected by the Society’s Animal Medicines Inspectorate (AMI).

5. In addition to enforcing the above legislation, the AMI also carries out investigations into medicinal/zootechnical residues in foodstuffs, possibly arising from the contamination of animal feedingstuffs, on behalf of the Veterinary Medicines Directorate. The inspectors are therefore also authorised under The Animals and Animal Products (Examination for Residues and Maximum Residue Limits) Regulations 1997.

The Animal Medicines Inspectorate

6. Sections 52 and 58 of The Medicines Act 1968 regulate the retail sale of medicinal products not on a general sales list and medicines requiring a prescription, respectively. It
is for this reason that the Society was named as the enforcement authority for the regulation of the sale and supply of a new category of veterinary medicine (PML) through Agricultural Merchants and Saddlers by the Ministry of Agriculture, Fisheries and Food (MAFF) in 1984.

7. In 1988 the first Medicated Feedingstuffs Regulations were implemented in Great Britain. As an organisation already enforcing retail sales of PML veterinary medicines and inspecting prescriptions for “in-feed” medicines used in animal feed mills, MAFF named the Society as the enforcement body for those Regulations. However, no direct funding was provided by MAFF; instead, the Regulations specified a statutory fee, payable to the Society by registered businesses, to meet the costs of enforcement activities.

8. Whilst the Society had a team of pharmacy inspectors already in place, it was thought that the new work was very specialised and therefore additional inspectors with comprehensive knowledge and experience of the animal feed/health industries were employed and an Animal Medicines Division (AMD) set up. The RPSGB(AMD) enforced both the Medicated Feedingstuffs Regulations and the “PML” Regulations.

9. The AMD initially consisted of a Head of Department, based at the Society’s headquarters in London, plus 4 regionally based inspectors. The number of inspectors was increased to 6 in 1990, when the number of registrants increased due to the requirement for “home-mixers” to be registered in addition to commercial feed compounders. The AMD subsequently evolved into the Animal Medicines Inspectorate (AMI).

10. In 1990 commercial feed compounders (Category A manufacturers) numbered approximately 260 whilst there were over 5000 on-farm mixers (Category B manufacturers). The next few years saw further controls implemented, particularly with regard to the sale/supply of medicated feeds, which resulted in the registration of 600 or so "Category 2 Agricultural Merchants". An important point to note is that at that time, antibiotic growth promoters (AGPs) and anti-coccidial supplements (ACS) were classified as "Schedule 2 PML medicines". Consequently, businesses selling feeds such as Chick crumbs + anti-coccidial supplements or pig feed + antibiotic growth promoter had to be registered with the RPSGB as Category 2 Merchants.

11. However, the number of businesses approved by the RPSGB has fallen continuously since 1990 (Appendix I). In 2000, the Society reviewed the viability of the AMI and concluded that with the decline, either cost-savings would have to be made or the Inspectorate closed. A decision to relocate the AMI from London to Stoneleigh Park, Warwickshire was made in a move designed to reduce costs. At the same time the Head of the Inspectorate retired and a Lead Inspector was appointed with responsibility for running the Inspectorate and conducting inspections, albeit in a smaller area. The new structure of the Inspectorate consisted of the Lead Inspector plus 5 regionally based inspectors.

12. All current inspectors hold a formal qualification in Agriculture/Science and are qualified ISO 9000:2000 auditors. ISO 9000:2000 is an international set of quality management principles. There are similarities between the AMI’s role of inspecting feed
manufacturers and the role of those responsible for auditing compliance with the ISO standards. Inspectors are experienced in all aspects of animal feedingstuffs manufacture including additive, premixture and both commercial and “on-farm” compound feed manufacture. The Inspectorate works to documented Standard Operating Procedures (SOPs). These are documented procedures on how the AMI conducts its activities and includes instructions on dealing with infringements, sampling and investigation procedures.

**Changes to the Regulations**

13. In 1998, feed regulations changed and Schedule 2 PML medicines were redefined as zootechnical additives under the Feedingstuffs (Zootechnical Products) Regulations 1998. In-feed POM medicines were also redefined as medicated feeding stuff (MFS) premixes and controlled under the Medicated Feedingstuffs Regulations 1998. At the same time, non-zootechnical additives, novel proteins, enzymes, micro-organisms, etc. were brought under control by the Feeding Stuffs (Establishments & Intermediaries) Regulations 1998. The two former regulations remained within the remit of the Veterinary Medicines Directorate (VMD) and the latter regulation under the Food Standards Agency (FSA) and were consequently enforced by the RPSGB (AMI) and local authorities, respectively. The AMI continued to be funded from fees levied on approved businesses whilst local authorities received direct funding.

14. Further to the above point, it should be noted that the conditions for approving and registering certain establishments and intermediaries operating in the animal feed sector, as implemented by the Feedingstuffs (Zootechnical Products) Regulations and the Feeding Stuffs (Establishments & Intermediaries) Regulations arise from the same Directive, namely 95/69/EC. The Directive sets out those businesses whose activities require approval and those that require registration (Appendix II). Activities requiring approval are deemed to be of greater risk than activities requiring registration, which is reflected in the requirements for the former.

15. The inspection and approval of MFS premix manufacturers is carried out by the Medicines Control Agency (MCA) on behalf of the VMD. In an effort to avoid duplication of inspections, the Feedingstuffs (Zootechnical Products) Regulations 1999 (as amended) states that an establishment manufacturing zootechnical additives shall be deemed to meet the necessary requirements if it is also approved as a manufacturer of medicinal (MFS) premixes. The Animal Medicines Inspectorate does not, therefore, visit such establishments. Furthermore, The Feeding Stuffs (Establishments & Intermediaries) Regulations state that where an establishment applies for registration under those Regulations, then it is deemed to meet the essential requirements if it also approved under the Feedingstuffs (Zootechnical Products) Regulations 1999. However, this recognition is not extended to establishments/intermediaries requiring approval under both Regulations and consequently both the AMI and some local authorities are inspecting establishments under similar legislation.
The Inspection Procedure

16. The Animal Medicines Inspectorate considers an inspection to consist of three distinct checks:

- Physical (and verbal);
- Documentary; and
- Sampling

Physical

17. The manufacturing premises/establishments’ facilities and equipment, including the storage area for controlled products, the warehouse, dispensary, weighing/measuring and manufacturing equipment and delivery vehicles, are physically checked for cleanliness, state of repair and general suitability. The physical inspection also offers the opportunity to discuss manufacturing and control procedures with personnel.

Documentary

18. Documents such as formulations, declaration labels, manufacturing records, medicines/zootchnical intake & usage records and cross-contamination matrix are examined to verify what has been seen and heard during the physical checks and to ensure that traceability and good manufacturing procedures are being observed. The manufacturers QA plan and procedures are also examined, including recovery and carryover tests using medicinal/ zootchnical substances and tracer substances\(^1\). Documented procedures, which must include an assessment and control of critical points, are also checked.

Sampling

19. During the course of a routine inspection informal samples of medicated/zootchnical feedingstuffs are taken for quantitative analyses (see Appendix III). However, where a sample is to be analysed “for the purpose of ascertaining whether there is or has been any contravention of any of the provisions of the Regulations” formal samples are taken according to the Feeding Stuff (Sampling & Analysis) Regulations 1999. Formal samples are also taken when results of informal samples indicate a problem with the manufacturing process.

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\(^1\) Tracer Substances are used in homogeneity tests. To conduct a homogeneity test, several samples of medicated/zootchnical feeds are taken. They could be analysed for the medicinal/zootchnical substance to show the consistency of dispersion throughout the feed (homogeneity) but the analytical techniques for medicinal/zootchnical substances are such that the tests themselves will lead to variation in recovery results (and therefore give a false reading of dispersion). Therefore other substances are allowed to be analysed such as Copper, Manganese or Zinc, which are normally added as a mineral supplement. If these substances are evenly distributed (as calculated from the coefficient of Variation or CV) then the feed is homogeneous.
20. It should be noted that there is some discussion over the taking of samples other than in accordance with the Feeding Stuffs (Sampling & Analysis) Regulations 1999. The AMI takes informal samples during a routine inspection for the following reason.

21. Informal samples are quicker, easier and cheaper to take than formal samples (1 person taking 15 minutes, compared to 2 people taking 1-2 hours respectively). As the Inspectorate must recover its costs from fees, formal sampling would add a significant cost to industry.

22. The taking of a sample only forms part of the overall assessment of the manufacturing procedures, and is not considered as an inspection *per se*. An AMI inspection includes checks on the facilities & equipment, storage, personnel, documentation, CCPs etc and is therefore more than the taking of a sample. Informal sampling allows greater time to conduct a more thorough assessment of the manufacturing system, e.g. by examining the manufacturer’s documented HACCP and prevention of cross-contamination matrix against actual procedures; (an analogy can be drawn between formal sampling and traffic speed cameras – both can demonstrate offences but neither necessarily improve the standards of “practice”).

23. As there are no tolerances for zootechnical additives, any result other than 100% recovery may be considered illegal and enforcement action would need to be taken. In other words unless the level of the zootechnical additive that is measured matches exactly the declaration, enforcement action may be necessary.

24. It is extremely difficult to take formal samples of home-mixed diets, much of which is mixed and fed immediately. Many home-mixed feeds also contain moist or liquid ingredients, such as silage or co-products. In addition, home-mixers make no declaration of the medicinal/zoo-technical level in the feed and therefore the question arises as to what the analysis result is assessed against. For medicinal products this would be the prescribed level but for zootechnical additives there is a permitted range of authorised active ingredient. Furthermore, if a sampled medicated/zootechnical feedingstuff yielded no detectable active ingredient present, no offence would have been committed since there was no declared level.

25. Formal samples are taken for the purpose of ascertaining whether an offence is being or has been committed. Other enforcement agencies also take informal samples. As outlined earlier, the AMI take informal samples only as part of a routine inspection to obtain an overall picture of the manufacturer’s compliance/competence.

**Enforcement**

26. The SOPs adopted by the Inspectorate define minor, major and serious infringements.

27. Minor infringements or non-conformances, are dealt with by the inspector during the course of an inspection by leaving a Confirmation of Inspection Report (COIR) or by a
follow up letter. Both documents set out the deficiencies observed and a time scale for rectifying them.

28. Major infringements are referred to the Animal Medicines Inspectorate office and would normally result in a warning letter being sent, detailing the deficiencies and a specified time scale for rectifying them. The inspector would normally make a follow up visit to ensure that the deficiencies had been corrected. The warning letter would be retained on file for a period of 3 years.

29. Serious deficiencies arising from intent or serious negligence or failure to correct major deficiencies, would normally result in the case being referred to the Society’s Animal Medicines Committee for consideration.

30. The Animal Medicines Committee (AMC) consists of 3 Society Council members and 6 members nominated by trade associations, which include the NFU, UKASTA and AHDA. The lay members have particular experience in one or more areas of the pieces of legislation enforced by the AMI. The Chair of the Committee is a Privy Council nominated member of the Society’s Council. The Committee considers all cases anonymously and has the authority to recommend formal action be instigated, including prosecution and/or withdrawal of approval.

**Future of the Animal Medicines Inspectorate**

31. The decline in the number of businesses approved by the RPSGB (AMI) will continue. The proposed banning of all remaining AGPs from 2006 will mean that 800+ zootechnical compound feed manufacturers will no longer require approval. Other in-feed medicinal/zootechnical substances will undoubtedly also be banned/withdrawn. To offset the resultant reduction in income from a reduced premise base, annual approval fees will need to be increased, which will inevitably lead to a further decline in the number of premises and perpetuate the cycle. As a body funded entirely from fees, this might well compromise the AMI’s ability to fulfil its enforcement duties.

32. The AMI is respected for its expertise, efficiency and uniform enforcement throughout Great Britain, not only by government agencies and industry bodies but also by approved businesses. The Inspectorate is currently in discussion with the Veterinary Medicines Directorate in an attempt to identify any additional work that the AMI could undertake, possibly by consolidation of a number of enforcement activities and/or whether direct funding from government could be obtained. The Inspectorate also believes that it could play a part in the consolidation of feedingstuffs legislation with the ultimate aim of improving the efficiency and effectiveness of enforcement.

**Action and Next Steps**
The Committee is invited to discuss the contents of this paper and to indicate whether any further information on clarification is required. In providing the basis for this paper the RPSGB made a number of suggestions for the Committee to consider. These will be supplied in time for the next (twenty first) meeting.

ACAF Secretariat
Food Standards Agency
June 2003
### Appendix 1 Registration History

<table>
<thead>
<tr>
<th>Year End</th>
<th>Non-Farm Manufacturer</th>
<th>On Farm Manufacturer</th>
<th>Farm Agricultural Merchant</th>
<th>Distributor/Intermediary</th>
<th>Saddler</th>
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</thead>
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<tr>
<td>1988</td>
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<td>n/a</td>
<td>1370</td>
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<td>239</td>
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<td>1131</td>
<td>659</td>
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<td>1998</td>
<td>199</td>
<td>2528</td>
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<td>918</td>
<td>479</td>
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<td>2002**</td>
<td>225</td>
<td>1479</td>
<td>875</td>
<td>415</td>
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<td>2003***</td>
<td></td>
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</table>

* Change to legislation meant that final zootechnical feed (previously final medicated feed) sellers no longer required approval

**Changes to legislation resulted in the reclassification of manufacturers and distributor/intermediaries.

*** see Appendix III

The decline in registered premises inspected by the AMI has fallen for a number of reasons:

1. as a consequence of the general decline in livestock farm numbers and consequently home-mixers;
2. the EU ban of certain medicines and additives previously used widely in the industry e.g. Dimetridazole and Avoparcin;
3. the prohibition of use of many additives/medicines under farm assurance schemes or for consumer reasons;
4. the cost of approval and inspections - particularly as this has increased due to increased inspection cycles (no category is now inspected less frequently than 18 months) and the cost of analyses of samples taken (both at the request of government); and
5. the reclassification of AGPs and ACS products as zootechnical additives and the omission of controls on the sale/supply of compound feeds containing them.
### Appendix II - Approval and Registration

<table>
<thead>
<tr>
<th>A=Approval</th>
<th>Manufacturers of Products covered by Dir 82/471 and/or additives</th>
<th>Intermediaries</th>
<th>Manufacturer of Premixtures</th>
<th>Intermediaries</th>
<th>Manufacturers of Compound Feedingstuffs</th>
<th>Home-Mixers</th>
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<tbody>
<tr>
<td>Category 1</td>
<td>A</td>
<td>A</td>
<td>A</td>
<td>A</td>
<td>A</td>
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<td>Category 2</td>
<td>A</td>
<td>A</td>
<td>R</td>
<td>R</td>
<td>R</td>
<td>R</td>
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<tr>
<td>Other Additives</td>
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<td>R</td>
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<td>-</td>
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<td>-</td>
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<td>-</td>
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<td>A</td>
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<td>Products Covered by 82/471/EEC</td>
<td>A</td>
<td>A</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

Category 1 – additives requiring approval of the manufacturers (establishments) and intermediaries (suppliers) for various activities:
- antibiotics: all additives in this group
- coccidiostats and other medicinal substances: all
- additives in this group
- growth promoters: all additives in this group

Category 1A - additives requiring approval of the establishments and intermediaries for various activities:
- trace elements: Copper & Selenium
- vitamins, provitamins and substances with similar effects, chemically well-defined: vitamins A & D

Category 2 - additives requiring approval of the establishments and intermediaries placing them on the market and registration of other operators:
- other vitamins and trace elements not in Category 1A
- carotenoids and xanthophylls
- micro-organisms and enzymes
- substances with antioxidant effects (i.e. with a maximum permitted level)

Other additives - additives only requiring registration of the manufacturers (establishments) and intermediaries (suppliers) placing them on the market:
- those additives with a maximum permitted level not included in categories 1, 1A or 2 above
- Proteins obtained from micro-organisms belonging to the group of bacteria, yeast, algae, lower fungi: all products in the group except the sub-group 1.2.1 (yeasts cultivated on substrates of animal or vegetable origin)
- Co-products of the manufacture of amino acids by fermentation

- Amino acids and their salts: all products in this group
- Hydroxyanalogues of amino acids: all products in this group

Products covered by Directive 74/63/EEC
- Raw materials referred to in Article 3a(2) of the Directive 74/63/EEC
### Appendix III  Feed Businesses Inspected by AMI

<table>
<thead>
<tr>
<th>Premise Type</th>
<th>Number</th>
<th>Inspection Cycle (months)</th>
<th>Sampling %</th>
</tr>
</thead>
<tbody>
<tr>
<td>I.3P Establishment</td>
<td>493</td>
<td>18</td>
<td>10</td>
</tr>
<tr>
<td>On-Farm MFS manufacturer</td>
<td>700</td>
<td>18</td>
<td>25</td>
</tr>
<tr>
<td>I.3M Establishment</td>
<td>24</td>
<td>18</td>
<td>25</td>
</tr>
<tr>
<td>Non-Farm MFS manufacturer</td>
<td>39</td>
<td>12</td>
<td>100</td>
</tr>
<tr>
<td>I.3M(sp) Establishment</td>
<td>2</td>
<td>12</td>
<td>100</td>
</tr>
<tr>
<td>Non-Farm MFS (sp) manufacturer</td>
<td>112</td>
<td>12</td>
<td>100</td>
</tr>
<tr>
<td>I.2 Establishment</td>
<td>12</td>
<td>12</td>
<td>100</td>
</tr>
<tr>
<td>I.1 Establishment</td>
<td>3</td>
<td>12</td>
<td>100</td>
</tr>
<tr>
<td>MFS Distributor</td>
<td>337</td>
<td>18</td>
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</tr>
<tr>
<td>I.1 Intermediary</td>
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<td>18</td>
<td>N/a</td>
</tr>
<tr>
<td>I.2 Intermediary</td>
<td>1</td>
<td>18</td>
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<tr>
<td>Agricultural Merchant</td>
<td>829</td>
<td>18</td>
<td>N/a</td>
</tr>
</tbody>
</table>

* as at 28.05.03
Categorisation of Manufacturer, Distributors & Intermediaries

<table>
<thead>
<tr>
<th>Activity for which Approval is required</th>
<th>Establishment/ Premise Type</th>
<th>General Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufacture of a zootechnical compound feedingstuff for feeding to own livestock only, using zootechnical premixtures at a rate of at least 2kg/t.</td>
<td>I.3P Establishment</td>
<td>On-farm mixers, mainly requiring approval to manufacture ruminant diets containing AGPs for feeding to own livestock.</td>
</tr>
<tr>
<td>Manufacture of a final medicated feedingstuff for feeding to own livestock only, using medicinal (MFS) products at a rate of at least 2kg/t.</td>
<td>On-Farm MFS Manufacturer (AB)</td>
<td>On-farm mixers, predominantly manufacturing pig and poultry feeds (although some sheep and dairy) for feeding to own livestock. Pig/poultry units normally also approved as I.3P establishments to use AGP/ACS products.</td>
</tr>
<tr>
<td>Manufacture of a compound zootechnical feedingstuff for sale, using zootechnical premixtures at a rate of at least 2kg/t.</td>
<td>I.3M Establishment</td>
<td>Small commercial feed compounding for different species of livestock but only requiring approval for the manufacture of final zootechnical feeds, for sale, via zootechnical premixtures at ≥2kg/t.</td>
</tr>
<tr>
<td>Manufacture of a final medicated feedingstuff for sale, using medicinal (MFS) products at a rate of at least 2kg/t.</td>
<td>Non-Farm MFS Manufacturer (AA)</td>
<td>Smaller commercial feed compounding, manufacturing feeds for different species of livestock and requiring approval for the manufacture of medicated feeds, for sale, using MFS premixes at ≥2kg/t. Normally also approved as an I.3M establishment.</td>
</tr>
<tr>
<td>Manufacture of a compound zootechnical feedingstuff for sale, using zootechnical additives directly and zootechnical premixtures at a rate of at least 0.5kg/t.</td>
<td>I.3M (Sp) Establishment</td>
<td>Larger commercial feed compounding, manufacturing feeds for different species of livestock, requiring approval for the manufacture of final zootechnical feeds, for sale, using zootechnical additives directly and premixtures at ≥0.5kg/t.</td>
</tr>
<tr>
<td>Manufacture of final medicated feedingstuffs and authorised intermediate products for sale, using medicinal (MFS) products at any permitted level</td>
<td>Non-Farm MFS(Sp) Manufacturer (AA(Sp))</td>
<td>Larger commercial feed compounding, manufacturing feeds for different species of livestock and requiring approval for the manufacture of medicated feeds and authorised intermediate products, for sale. MFS premixes used at any permitted level.</td>
</tr>
<tr>
<td>Activity for which Approval is required</td>
<td>Distributor/Intermediary Type</td>
<td>General Details</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>------------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>a. Sale, supply or storage (distribution) of a medicated feedingstuff.</td>
<td>MFS</td>
<td>Agricultural Merchants (as defined in the “PML Order”) or specialist Distributors of medicated feedingstuffs.</td>
</tr>
<tr>
<td>b. Wrap, package, storage or circulation (distribution) of a zootechnical premixture.</td>
<td>I.2</td>
<td>Specialist suppliers of zootechnical premixtures. May not necessarily “physically handle” products but act as an intermediary between the manufacturer and purchaser.</td>
</tr>
<tr>
<td>c. Wrap, package, storage or circulation (distribution) of a zootechnical additive.</td>
<td>I.1</td>
<td>Specialist suppliers of zootechnical additives. May not necessarily “physically handle” products but act as an intermediary between the manufacturer and purchaser.</td>
</tr>
</tbody>
</table>

**Note:** Application can be made for more than one activity. For example, a home-mixer may require approval to manufacture feeds containing both zootechnical and medicinal products, in which case an application would be made for approval as an I.3P establishment and an On-Farm MFS manufacturer.
Appendix IV – Enforcement Bodies Operating in the Animal Feedingstuffs Sector

*DEFRA Investigation Branch (on behalf of VMD)*

- Manufacture and importation of unlicensed veterinary medicines, including MFS premixes.

*Local Authorities*

- inspection of manufacturers and suppliers of non-zootechnical additives, premixtures and feedingstuffs (except registered establishments additionally approved for zootechnical products by RPSGB);
- Enforcement of the Feedingstuffs Regulations.

*Medicines Control Agency (MCA - on behalf of VMD)*

- approval and inspection of manufacturers of veterinary medicinal premixes and some manufacturers of zootechnical additives (those who also manufacture medicinal premixes).

*RPSGB*

- approval and inspection of manufacturers of zootechnical additives (other than MCA approved);
- approval and inspection of manufacturers and suppliers of other zootechnical products;
- approval and inspection of manufacturers and distributors of medicated animal feedingstuffs (including Agricultural Merchants approved under the “PML” Regulations);
- investigation of illegal feedingstuffs activities relating to the above;
- investigation into medicated/zootechnical food safety incidents arising from feedingstuffs (on behalf of VMD).

*State Veterinary Service*

- involvement with residues including those arising from animal feedingstuffs
- Sampling for MMBM.

*Other Inspection Bodies:*

- UFAS (UKASTA Feed Assurance Scheme);
- Farm Assurance schemes;
- Food retailers.
Other non-feedingstuffs Inspection Bodies visiting feed manufacturers
- Environmental Health;
- Health Safety Executive;
- The Egg Inspectorate;
- Dairy Hygiene Service.