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Foreword

I am delighted to present the 2013 Annual Report of the Advisory Committee on Animal Feedingstuffs (ACAF) and hope that you find this report and the information it contains useful in exploring the work of the ACAF.

The Committee had an extremely busy year in 2013, offering expert advice on many diverse and challenging issues with potential impacts on the feed and food chain. Our primary aim is ensuring the safety of animal feed and ultimately the effects feed may contribute to animal and public health.

One of the main topics that Members continued to consider was potential gaps in UK feed safety controls. The Committee was asked to look at this topic in 2011 following the German dioxin incident, when large quantities of feed fats were contaminated by dioxins. One of the aims of the review was to identify areas that may need addressing to help prevent a similar incident occurring in the UK. Members suggested three main work streams that required an in depth investigation: identification of feed businesses, awareness/competence of feed business operators; and feed imports. The Committee's conclusions and recommendations on this topic were published on the ACAF website in December 2013.

The Committee also considered the presence of iodine in animal feed. The Department of Health has responsibility for the trace element status of consumers and levels in food; however, ACAF does have an interest in respect to levels of feed additives that are used to supplement feeds. Members agreed that this is an important issue for the Committee as most of consumer dietary exposure to iodine comes from the consumption of animal-derived foods, especially milk and dairy products.

I am also extremely grateful to Members, for their assistance in providing comments on another important topical work area: namely the review of balance of competences. This is an audit of what the EU does and how it affects the UK as a whole.

The Committee also received a number of expert presentations. This was particularly helpful in assisting the Committee to provide balanced evidence-based advice whilst raising Members' technical and specific understanding on a number of key topical issues. Matters of note included: an update on feed additives, an update on antimicrobial resistance and insects as a potential source of animal feed and pet food issues.

I am extremely grateful to the many guest speakers for agreeing to provide presentations to the Committee. These were particularly informative and helped the Committee broaden its evidence-based knowledge in areas of uncertainty, thus facilitating discussion and allowing the Committee to provide properly informed and practical advice to the feed and farming community and related industries, the Food Standards Agency, and relevant UK Ministers.

I would like to give particular thanks for the support, dedication and time the Members and the Assessors give to the work of ACAF. I was particularly sorry to lose the valuable input provided by three long-standing Members; (Dozie Azubike, Nigel Halford and Richard Scales), whose terms of appointment ended during the course of the year. They provided excellent input during their considerable time on the Committee and I wish them well in the future.

Finally, I would like to thank the ACAF Secretariat for their continual support to the Committee in ensuring that the work programme is carried out in a timely and efficient manner. They have, as ever, ensured that members were always kept fully informed and up-to-date on emerging issues and expertly advised the Chairman on matters of urgency and administration.

**Dr Ian Brown – OBE BSc (Agric) FRCP FFOM
Chairman of ACAF**

About the Committee

1. The Advisory Committee on Animal Feedingstuffs (ACAF) was set up in June 1999 to advise on the safety and use of animal feeds and feeding practices, with particular emphasis on protecting human health and with reference to new technical developments and new feed materials and products.
2. The decision to set up the Committee was made in the light of concern about the integrity of animal feeds, particularly over the implications of Bovine Spongiform Encephalopathy (BSE) and the use of genetically modified (GM) feed ingredients. The decision was announced in the White Paper, “The Food Standards Agency: A Force for Change”, published in January 1998 and it implemented the principal recommendation of the report of the Expert Group on Animal Feedingstuffs, published in July 1992.
3. The Committee’s primary purpose is to advise on the safety and use of animal feed in relation to human health. However, it also covers animal health aspects and a wide range of contemporary issues including advice on the UK negotiating line on new European Union proposals, animal feed ingredients including genetically modified organisms (GMOs) and labelling and information for purchasers of animal feed.
4. ACAF is a UK-wide advisory committee and is made up of independent experts who are appointed by UK Ministers and the Chairman of the Food Standards Agency (FSA). Members are appointed for their individual expertise and experience and are not representative of any organisation.

Terms of Reference

5. ACAF advises the Food Standards Agency, the Secretary of State for Environment, Food and Rural Affairs, Ministers of the Scottish Government and of the Welsh Government and the Minister for Agriculture and Rural Development in Northern Ireland on the safety and use of animal feeds and feeding practices, with particular emphasis on protecting human health and with reference to new technical developments. In carrying out its functions, the Committee liaises with other relevant advisory committees as appropriate.

How to Contact the Committee

6. ACAF welcomes your views and suggestions on all aspects of its work. Please address your comments and any requests for information to:

The ACAF Secretariat
Food Standards Agency
Room 1B
Aviation House
London WC2B 6NH

Tel: 020 7276 8083
Fax: 020 7276 8289

e-mail: acaf@foodstandards.gsi.gov.uk

If you would like to receive ACAF documents regularly, please complete the form at Annex I and return it to the Secretariat at the address above.

The Committee's Work in 2013

Feed Safety – potential gaps

7. Following the German dioxin incident in 2011/12 the Committee had embarked on a major area of work to consider potential safety gaps in the feed sector. This included the identification of possible gaps or weaknesses in legislation, enforcement, standards and the practices of feed businesses. The aim was to prevent similar incidences occurring in the UK.
8. During 2013 the Committee considered the ways in which advice on feed is provided to farmers. The issue was that poor advice may have implications for animal health and possibly for consumers of livestock products. At its January 2013 meeting, Mr George Perrott (AIC) provided a presentation to Members on the development of a Feed Adviser Register that AIC was drawing up. Mr Perrott explained that the Register was being developed to demonstrate that the livestock sector generally is improving awareness amongst farmers of greenhouse gas (GHG) emissions and of the particular farm practices that will improve efficiency and business performance. The aim is to contribute to the agriculture industry's share of GHG savings, part of an overall UK Government commitment towards a 80% reduction in GHG emissions from 1990 levels across the UK by 2050.
9. Mr Perrott acknowledged that there are already precedents set in other agriculture sectors with schemes such as BASIS¹ and FACTS². There are also a number of farm schemes aimed at improving the performance of livestock farmers such as DairyPro³ and PIPR⁴. Mr Perrott referred to the BSAS⁵ scheme⁶ for professionals operating in the livestock industry. Although the BSAS scheme was similar to the proposed AIC scheme it had a slightly different focus.
10. Mr Perrott explained that whilst improving feed safety is not the main function of the Feed Adviser Register, having people providing feeding advice on farm to a standard that improves feeding efficiency, and updating their skills by way of continuing professional development (CPD) might help. Feed safety in the livestock feed sector is managed by way of schemes such as the Feed Materials

¹ BASIS is an independent standards setting and auditing organisation for the pesticide, fertiliser and allied industries.

² (Fertiliser Advisers Certification and Training Scheme) which is the body responsible for both setting and maintaining standards of advice given by individuals on farm with regard to fertilisers.

³ <http://www.dairypro.co.uk/>

⁴ [Pig Industry Professional Register](#)

⁵ British Society for Animal Science

⁶ Members were provided with a presentation on BSAS at the 19 September 2012 meeting.

Assurance Scheme (FEMAS), Universal Feed Assurance Schemes (UFAS) and by enforcement authorities. Mr Perrott explained that the objectives of developing the Feed Advisor Register were:

- to demonstrate a level of competence in the provision of advice on animal feeding, particularly with respect to GHG performance;
- to include all personnel who provide feeding management advice to livestock farmers;
- to update the skill/knowledge base on a regular basis by requiring individuals to undertake training/CPD to remain on the Register; and
- facilitate and improve knowledge transfer – a critical element to ensure the delivery of improved GHG performance on farm.

11. Membership is for all personnel who provide feed or feed management advice, including advice on feed ingredients, whether provided directly or indirectly to livestock farmers in the UK. However, feed ingredient traders, shippers or forwarders do not need to be registered. The objective of setting entry level criteria is to attract a wide intake of participants including commercial staff, whilst requiring a significant level of competence.
12. Mr Perrott said that the scheme will be managed by AIC Services who currently operate the assurance schemes, and the scheme is open to anyone who meets the criteria.
13. Members noted that in previous discussions the Committee did not believe that the proposed feed register would affect feed safety. This was because on-farm incidents were not normally attributable to advice from third parties.
14. At its January 2013 meeting, Mr Franck (FSA Assessor) introduced a paper which the Committee had requested that summarised the main issues relating to controls on feed imported from non-EU countries.
15. Mr Franck noted that feed imported from non-EU countries for use in the EU must comply with the same requirements as feed produced in the EU. The European Commission's Food and Veterinary Office had carried out audits of feed law enforcement in 2009, 2011 (Great Britain) and in 2012 (Northern Ireland) that had included controls on imports. The report of the 2011 audit indicated that significant progress had been made since the previous audit in relation to the arrangements in place at entry points for the identification of imported feed. However, at some major entry points local authorities did not

carried out risk-based controls. In addition, the range of analyses carried out on imported feed was limited.

16. Measures put in place to strengthen enforcement of imports of feed from non-EU countries included the annual dissemination by the Food Standards Agency of enforcement priorities for feed authorities, which includes a section on imported feed; the provision of various funds to local authorities to help them set up systems for the enforcement of feed controls and for carrying out sampling and analysis of imported feed consignments; and the issue of various guidance and training for local authorities to assist them in their enforcement role. In addition, the National Animal Feed Ports Panel, which includes representatives of enforcement bodies, discusses and advises on official controls on issues to help resolve common problems and promote a co-ordinated approach. The work being carried out to implement the findings of the Review of Official Feed Controls would also address ways of strengthening controls at points of entry.
17. Members considered that, in terms of coverage of information and issues the paper covered the main issues and agreed that the paper should be updated as necessary.
18. For its 8 May 2013 meeting, Mr Franck prepared a paper that provided a summary of information provided to the Committee; the issues identified by the Committee, the gaps and weaknesses mainly identified during discussions and a record of work being put in hand by the Agency, local authorities and the feed industry to address shortcomings. Mr Franck indicated that the paper showed that the Committee had identified a range of possible weaknesses and areas where improvements could be made, many of which are reflected by the FVO audits and the Agency's review of feed law enforcement. Members provided some additional information for the FSA Assessor to include in a revised paper. The ACAF Secretary suggested that any gaps not covered in the paper which emerged at a later stage could be discussed at future ACAF meetings. The conclusions and recommendations of the Committee was published on 10 December 2013 and can be viewed using the link below:

<http://acaf.food.gov.uk/papers/reviewgaps>



The ACAF Secretary and ACAF Chairman (Bristol 2013)

Balance of Competences Review

19. At ACAF's 16 January 2013 meeting, Mr Mark Willis of the Food Standards Agency's Balance of Competences Review Team explained that the review was an UK-wide exercise in gathering factual information and evidence on the activities of the European Union (EU) and how it affects the United Kingdom. Competence refers to where the European Treaties give the European Union power to act. The EU has very wide competence in relation to food and feed. The form of competence the EU has for food/feed is 'shared', meaning that where the EU has acted individual Member States are normally prevented from doing so. For a successful review, a wide level of stakeholder engagement is encouraged including committees, organisations and international trading partners.

20. Mr Willis asked the Committee to consider the benefits and disadvantages for trade, consumer protection and incidents handling.

21. Additionally, the Committee was asked to consider whether:

- the UK benefits from EU level feed legislation for feed businesses, consumers and enforcers;
- the legislation is sufficiently risk-based;
- burdens on businesses are minimised;
- European processes are proportionate, responsive and transparent; and

- it would be better for all, or some, legislation to be at national or higher international level.

22. Mr Willis encouraged Members to respond to the call for evidence which was launched in November 2012 and ended on 28 February 2013. Finally, Mr Willis advised that other reviews being undertaken include one on health. The Committee agreed to provide the ACAF Secretariat with their contributions, which were used in a formal response sent to the Balance of Competences Review.

23. The report on Animal Health, Welfare and Food Safety (including feed safety) was published in July 2013:

<https://www.gov.uk/government/consultations/call-for-evidence-animal-health-welfare-and-food-safety-review>

Feed Implementation Review Programme

24. In October 2012, the Agency's Feed Delivery Review Team provided an intersessional paper (ACAF/12/06) to the Committee. At its 16 January 2013 meeting, Ms Toni Smith of the Food Standards Agency's Feed Review Implementation team introduced ACAF paper 13/02 which explained that at the March 2012 FSA Board meeting it was agreed that the Agency would complete a review of local authority delivery of official animal feed controls. The Review Team had reviewed and analysed key information and data, including reports from recent Food and Veterinary Office (FVO) and FSA local authority audits. Ms Smith noted during its audits of enforcement systems in Great Britain in 2009 and 2011, the FVO had concerns about the quality and quantity of official controls carried out by local authorities. These concerns were also noted in audits of local authorities carried out by the Food Standards Agency in 2011 and 2012, and from annual returns on enforcement activity submitted to the Food Standards Agency by local authorities.

25. The Review Team's findings were presented to the Food Standards Agency Board in November 2012. Ms Smith explained that the review had recommended that five key work streams be established to deliver the review's recommended improvements. These included:

- how official controls can give greater recognition to the use of industry own checks through the use of earned recognition and industry assurance schemes;
- local authority regional/national delivery, with improved controls at

- smaller ports and sampling;
 - information and data management;
 - liaison with other government departments to reduce footfall and improve intelligence; and
 - revision of the Feed Law Code of Practice and relevant training provided.
26. Ms Smith provided an explanation of future work that the review implementation team had planned. This included engagement with local authorities to develop a national/regional delivery model, improving FSA data and information management, sharing information with other government departments and improved engagement with various sectors of the feed industry. Food Standards Agency officials would also meet with the FVO at the end of January 2013 to update them on progress and to ensure that the work streams are in line with FVO expectations.
27. The ACAF Secretary confirmed that the Food Standards Agency's Standards Branch was in the process of updating the Code of Practice on Feed Law Enforcement, which will be sent to the Animal Feed Law Enforcement Liaison Group for comment. ACAF will also be invited to comment on the revised code of practice via correspondence.
28. In addition, the ACAF Secretary informed Members that he will be involved in meetings with operators of assurance schemes to discuss earned recognition, including the frequency of inspections. He hoped that assurance scheme operators and their auditors would be involved in these discussions.
29. At its May 2013 meeting, Mr Ron Cheesman of the Food Standards Agency's Standards Branch introduced paper ACAF 13/12 which provided Members with an update on progress of the implementation programme to deliver improvements to current local authority delivery of official controls for animal feed.
30. Following Members questions, Mr Cheesman explained that information in the form of Memoranda of Understanding (MoU)⁷ were in place to help local authorities co-ordinate inspections with other government departments responsible for feed controls, e.g. VMD. Mr Cheesman also said that, as part of the Food Standards Agency revision of the Feed Law Code of Practice, the FSA was devising a competence framework for local authority officers which included specific requirements based on the duties/tasks officers were authorised to undertake. This competency framework was being closely linked to technical aspects of the Regulators Development Needs Analysis (RDNA) model developed by the Better Regulation Delivery Office (BRDO). Mr

⁷ <http://www.food.gov.uk/enforcement/enfcomm/afleg/aflegmembertor>

Cheesman also provided an explanation of the principles of earned recognition. This involved reduced frequency of inspections to feed establishments which operated to an assurance scheme standard and which included independent third party audits. The Agency would vet such schemes and when they met certain requirements, including exchange of information concerning audit of members, then their members would be eligible for reduced levels of inspection. In addition, feed business operators who could demonstrate good levels of compliance would also be able to take advantage of reduced inspection levels. The intention was to help local authorities target their resources at those establishments which did not comply with feed law. Following a question from the ACAF Chairman on how businesses would qualify for earned recognition, Mr Cheesman referred to the criteria which applied in deciding which businesses could benefit from earned recognition.

31. On the issue of awareness of the work the Agency was carrying out on earned recognition, the ACAF Secretary confirmed that he had been chairing meetings with the main representatives of the feed sector including the NFU. During discussions with the NFU it was agreed that the cascade of information needed to go wider and that the Food Standards Agency should address this point.
32. Members of the Committee agreed to provide the ACAF Secretariat with any comments they had on the revised draft Feed Law Code of Practice.
33. Ms Smith provided a further update to Members on the work being undertaken by the Agency's Feed Review Implementation Team at its October 2013 meeting. Ms Smith said that progress on the five work streams contributing to the programme that was established in November 2012 to improve the current local authority feed law enforcement delivery system was going well.
34. The ACAF Secretary confirmed that further updates on the work undertaken by the Feed Review Implementation Team would be provided to the Committee at future meetings.



ACAF Members deliberation

Iodine in Animal Feed

35. Although the trace element status of consumers and levels in food falls within the remit of the Department of Health, ACAF does have an interest in respect to levels of feed additives that are used to help supplement feeds with trace elements. The European Food Safety Authority (EFSA) has given advice to lower the maximum permitted levels of iodine-based feed additives in complete feedingstuffs. At its October 2013 meeting Members of the Committee were informed that the UK's Scientific Advisory Committee on Nutrition (SACN) was considering the issue of iodine in health at its meeting on 9 October 2013.
36. Professor Rayman from the University of Surrey and Professor Ian Givens (ACAF member) provided the Committee with a presentation on possible links between iodine levels in food and child cognitive development. The Committee learnt that studies carried out among UK women indicate that there is an iodine deficiency in many women of child bearing age and in pregnant women. Importantly, in a study recently published in *The Lancet* by Professor Rayman and colleagues, a significant association was shown between iodine deficiency in 1,000 pregnant women in the Bristol area and poorer childhood cognition.

Members were also informed of research being undertaken at the University of Reading to determine factors affecting the iodine concentration of bovine milk. The milk iodine content was dependent mainly on the dietary iodine intake of dairy cattle although there is evidence that other dietary components such as glucosinolates may reduce iodine transfer from diet to milk. Additionally, the industry targets of the dietary concentration of iodine in dairy cow diets, to meet the needs of the animal, were similar to the new maximum levels suggested by EFSA. However, the target proposed by EFSA would only realistically be achieved during winter months.

37. Members agreed that it would be beneficial if SACN and ACAF worked together on this matter. This is an important issue for ACAF, as most of consumer dietary exposure to iodine comes from consumption of animal-derived foods, especially milk and dairy products.

Presentations

38. During 2013, the Committee received several presentations from internal and external experts to help facilitate their consideration of animal feed issues. It was generally agreed that the presentations were also useful in providing opportunities to shape the Committee's agenda and possible outcomes.

Update on Feed additives

39. At ACAF's January 2013 meeting, Ms Abrar Jaffer (ACAF Secretariat) introduced paper ACAF/13/06 which provided an update on feed additives. She said that EU Regulation 1831/2003 controls the use of additives in animal nutrition. These are substances, micro-organisms or preparations, other than feed materials or pre-mixtures that are intentionally added to feed or water in order to perform a range of functions. They have technological (added to feed, for example, to regulate acidity of the feed), sensory (for example to make the feed more palatable for animals, or to make the food from animals more appealing to humans), nutritional (to improve the nutrition of the feed for animals) or zootechnical (for example, to enhance feed digestion, or reduce phosphate excretion).
40. Ms Jaffer advised the Committee that feed additives authorised under EC Directive 70/524 need to be re-assessed and re-authorised. She described the re-authorisation/re-assessment process which included:

- receipt of documents;
- work on documents;
- preparation of a draft opinion for consideration by FEEDAP; and

- issue of the formal EFSA opinion.

41. Changes to the conditions of authorisation can be possible; for example, in respect of particular animal species or categories provided good evidence is presented. Ms Jaffer said that in accordance with Article 17 of Regulation (EC) No 1831/2003 on additives for use in animal nutrition, the Commission has established a Register of Feed Additives on its website; this is updated regularly on line and published twice a year. The Register is divided into two Annexes: I - a list of authorised feed additives; and II – a list of ‘orphan’ additives. The Register can be viewed using the following link:

http://ec.europa.eu/food/food/animalnutrition/feedadditives/comm_register_feed_additives_1831-03.pdf

42. Ms Jaffer explained that orphan additives are authorised additives which have not been supported with re-assessment applications. These additives are to be withdrawn from the market. It is estimated that 1,500 additives have been orphaned and will have their authorisations revoked. Votes to revoke orphan additive authorisations are taken at meetings of the Animal Nutrition Section of the Standing Committee of Food Chain and Animal Health. Currently, orphaned silage agents and flavours are no longer allowed for use due to their authorisations being revoked. It is anticipated that colours will be the next set of orphan additives that will have their authorisations revoked.

43. On recent developments with feed additives, Ms Jaffer said that the EU Feed Additives Register had been updated, feed additive authorisations were continuing with votes for authorisation and revocations taking place in Brussels. Discussions in Brussels are also continuing on amendments to EC Regulation 1831/2003 so that additives can be administered safely to animals via different carriers such as water. In addition, discussions are also taking place on how to amend Commission Directive 2008/38, which will establish a list of intended uses of animal feedingstuffs for particular nutritional purposes including boluses and other products with high levels of nutritional additives.

44. The Committee was grateful for the update on work being carried out on the re-assessment and re-authorisation of feed additives, and agreed that it would like to receive future updates.

Update on antimicrobial resistance

45. At its 8 May 2013 meeting, ACAF Member Professor Stephen Forsythe provided an account of discussions on antimicrobial resistance by the

Advisory Committee on Microbiological Safety of Food (ACMSF) at its meeting on 31 January 2013. Professor Forsythe confirmed he had been co-opted onto an ACMSF subgroup that would consider the subject in more detail.

46. Professor Forsythe provided a further update on the work of the ACMSF subgroup at ACAF's 9 October 2013 meeting. The update included the number of meetings held, the sub-group's terms of reference, scope and topics discussed and outcomes from the first formal meeting held on 9 September 2013.

Pet food issues

47. At its 8 May 2013 meeting a representative of the Pet Food Manufacturers' Association and two industry representatives provided a presentation (ACAF paper 13/14) to ACAF Members on pet food issues including the re-authorisation of feed additives.
48. Ms Lana Oliver of the Pet Food Manufacturers Association (PFMA) said that the PFMA is the principal trade body representing the interests of the UK pet food manufacturers. The Association was established in 1970 and now has over 70 members, accounting for 90-95% of the UK manufacturers. PFMA members mainly manufacture cat and dog food, but also food for smaller animals, horses and in 2012 the membership was extended to include manufacturers of wild bird food. Also included in the PFMA membership are ingredient suppliers, i.e. those who produce additives, pre-mixtures and animal-based raw materials. PFMA works alongside Government departments and national experts from those agencies as well as many academics from the veterinary and pet nutrition world. PFMA is a member of FEDIAF, the European pet food manufacturers' association.
49. Ms Oliver explained that pets are defined in the legislation as "any non-food producing animal belonging to species fed, bred or kept, but not normally used for human consumption in the Community" and that there are over fifty pieces of legislation governing the manufacture of pet food. The main pieces of legislation cover:
- animal by-products; and
 - feed hygiene, marketing, additives and undesirable substances, PARNUTS⁸, feed materials, GMOs⁹ and TSEs¹⁰.

⁸ PARNUTS - Feeds for Particular Nutritional Use

⁹ GMOs – Genetically Modified Organisms

¹⁰ TSE - Transmissible spongiform encephalopathies

50. Members were informed that the legislation encourages the provision of industry codes and guides which are intended to be practical guidelines for manufacturers to help them comply with the legislation. FEDIAF has produced codes on good manufacturing practice; nutrition for cats and dogs (nutrition for rabbits is in the process of adoption); and good labelling practice. The most recent code is the Code of Good Labelling Practice for Pet Food which can be accessed via the Official Journal of the European Union and the PFMA website.
51. One of the main issues that the pet food sector is facing is in the area of the re-evaluation and authorisation of additives. Ms Liz Colebrook (Mars Petcare) explained, that before each additive can be re-authorised the European Food Safety Authority (EFSA) is asked for an opinion. The industry is concerned that EFSA is publishing opinions on additives and recommending maximum limits based solely on current usage (as identified in dossiers) and not based on safety information. Many additives could thus be authorised with legal maximum limits that; i) were too low to meet nutritional requirements of some species; ii) affected existing safe, nutritionally balanced products; iii) would hamper future innovation; and iv) in some cases, would unnecessarily require labelling that is potentially misleading to the purchaser.
52. This is of serious concern to general animal health and a fundamental flaw to EFSA opinion making. Authorisations that were generic, could become company specific, leading to:
- increase in price;
 - reduced supply;
 - market regulation through legislation; and
 - numerous applications for the same additive (with slightly different specifications).
53. Ms Colebrook stated that guidance on the requirements for applications for pet food additives (new and re-authorised) detailing requirements for a certain amount of animal testing on cats and dogs instead of using data from laboratory or farm animals had been produced. EFSA had refused a request (from FEDIAF) to modify these requirements in order to delete animal testing and to permit the use of data from other animals in all cases. EFSA stated that the guidance only further clarified the requirements of Regulation (EC) No. 429/2008¹¹ and did not make additions. Members of PFMA fully support the request made by FEDIAF in order to prevent unfair treatment of animals. If EFSA proceeds in this way, innovation would be affected in the UK as animal

¹¹ on detailed rules for the implementation of Regulation (EC) No 1831/2003 of the European Parliament and of the Council as regards the preparation and the presentation of applications and the assessment and the authorisation of feed additives

testing is strongly opposed. This also goes against the principle of the three R's in EU legislation – to Replace, Reduce and Refine the use of animals including protection of animals used for scientific purposes.

54. Additionally, some transitional periods for labelling changes had been set at only six months which was totally impractical for the pet food industry. The pet food industry has proposed lengthier transitional periods of four years for labelling. FEDIAF sent a request to the Commission (DG SANCO). Ms Colebrook explained that the time taken to change a label is on average 6-14 months; that approximately 85,000 labels across Europe would need to be changed; and that large stocks of existing labels would need to be used up or they would go to waste. This would not only be costly to the industry but have a very negative impact on the environment.
55. The pet food industry believes that continually changing labels will only confuse the consumer in that they will see a new label on products they already buy and assume a change in composition. Additionally, they find the same products with a number of different labels on the shelf together. This goes against the principles for labelling and presentation laid down in Regulation 767/2009 Article 11 paragraph 1, i.e. 'the labelling and the presentation of feed shall not mislead the user'.
56. The Committee sympathised with the issues raised and agreed to provide assistance where it could do so.

Insects as a potential source of animal feed

57. With an increasing global population and a rise in per-capita meat consumption in some developing countries, the European Union (EU) announced in April 2011 an initiative highlighting the need for the EU to find alternative and sustainable protein sources. To this end, the Committee was interested to hear about research being undertaken at FERA (ACAF Paper 13/21) and elsewhere on insect protein as a future feed material at its October 2013 meeting.
58. Members heard from Dr Elaine Fitches and her colleague Dr Adrian Charlton that research into the use of insects as alternative protein source for animal feed is being undertaken because insects are highly efficient in the rapid conversion of waste into biological material. Additionally, a variety of insects have been shown to have equivalent or higher protein content than soyabeans. Members were informed that in the Netherlands, the International Insect Centre was established in September 2013. This involves 15 companies and government agencies who are interested in promoting the application of insects and insect

larvae as materials for use in the feed, food and the pharmaceutical industries. FERA is involved in research looking at the use and exploitation of insects as alternative protein sources, including the production quality and safety of insect protein, but not the commercialisation aspects of using insects as an alternative protein source¹².

59. Members agreed that they would like updates on the research work being carried out by FERA and by others.

Consumer Engagement

60. At its October 2013 meeting, the Committee received a presentation (ACAF paper 13/22) from Ms Ann Davison (ACAF Consumer Representative Member) on how it could improve its interactions with consumers. Members were informed of different methods they could adopt for improving the way the Committee engages with consumers; for example, engaging with stakeholder groups, attending consumer events and ensuring that messages from the Committee were clear, using plain English.

61. The Committee agreed it would continue to work with its consumer representative and with FSA officials involved in social science and consumer engagement in order to improve the way ACAF interacts with consumers.

Genetically Modified (GM) Issues related to animal feeds

Approval of GM lines

62. During the year, the Committee was informed of progress with authorisation of various GM crops that had been evaluated by the European Food Safety Agency (EFSA) under EU Regulation 1829/2003 on GM Food and Feed. A full list of GM approved materials is maintained on the European Commission's website:

http://ec.europa.eu/food/dyna/gm_register/index_en.cfm

¹² It should nevertheless be borne in mind that, under current EU rules on animal by-products, insects and insect meal cannot be used as or in feed for food-producing animals.

EU Developments

63. In addition to those already mentioned, the Committee received reports on a wide range of EU policies and legislation throughout 2013. Relevant papers are listed in Annex II.

Official feed and food controls – Review of Regulation (EC) No 882/2004

64. EC Regulation 882/2004 sets out the general approach that must be taken, and the principles that must be adopted, by the competent authorities in EU Member States that have responsibility for monitoring and enforcing feed and food law and animal health and animal welfare rules. It also provides the legal basis for the European Commission to assess the effectiveness of national enforcement arrangements. The aim is to create a more comprehensive and integrated, risk-based, EU-wide, ‘farm to fork’ approach to official controls. The objective is to improve the consistency and effectiveness of controls across the EU and as a consequence, raise standards of food safety and consumer protection and provide a more level playing field for businesses. Most of the provisions applied from 1 January 2006, with others, primarily those on the financing of official controls, applied from 1 January 2007.

65. At its 16 January 2013 meeting the Committee was informed that the European Commission was undertaking a revision of Regulation (EC) 882/2004 following a 2009 evaluation study of its implementation. The study findings suggested that some improvements were necessary in a number of areas to clarify the official controls framework. These included: controls on residues of veterinary medicines, EU border controls on live animals and products of animal origin, and the rules governing the financing of official controls. The study also indicated that, in order to streamline and eliminate redundant control requirements, Regulation (EC) 882/2004 should also cover controls to verify compliance with plant health, seeds and propagating material law.

66. Members were informed that in order to achieve improvements the Commission has been working on a package of five proposals: the revision of Regulation (EC) 882/2004, three sector specific legislative reviews on Animal Health, Plant Health and Plant Reproductive Material and a linked proposal on expenditure. The package of proposals was adopted in May 2013.

67. A major component of the revision will be changes to the current rules that Member States must follow for the financing of official controls. The Commission, to ensure the long term sustainability of official controls, is proposing an extension of mandatory charges and that Member States recover the full cost of controls. This will involve a significant increase in the number

of controls where mandatory charges will apply; although, micro businesses¹³ will be exempt from the charges.

68. An official from the FSA provided members with a presentation (ACAF paper 13/24) at its October 2013 meeting, which provided an update on proposed changes to the official feed and food controls (EU Regulation 882/2004).
69. Members were informed that businesses will benefit from simpler, science and risk based rules in terms of reduced administrative burden, more efficient and transparent processes and improved cross-border co-operation. For importers, the proposal will mean a common set of organisational rules applicable to all checks carried out at borders on food, feed, animals, products' of animal origin, plants and other products. The proposed changes also intend to support more sustainable and effective control systems across member states. Members were informed of the work the Agency and Defra had undertaken in advance of formal negotiations taking place in Brussels. Prior to the negotiations starting the Agency would launch a public consultation on the proposal, including a draft impact assessment showing the cost of official controls in the UK.
70. The Committee agreed that it wished to receive updates on this work.

Review of Regulation (EC) No 152/2009 on the methods of sampling and analysis for the official control of feed

71. The European Commission held meetings of its Sampling Working Group and undertook a consultation with industry stakeholders on an amended version of Annexes I and II of the Regulation which deal with the sampling of feed for official control purposes and its preparation for analysis. The Commission's intention is to bring the sampling requirements more into line with those for food, and to address the issue of sampling from bulk consignments where the distribution of contaminants is not expected to be homogeneous to produce a workable solution to this problem.
72. A further update was provided at ACAF's 8 May 2013 meeting where Members were told that the Regulation was voted into effect at the February 2013 meeting of the SCoFCAH (Animal Nutrition). The amendments to Annex I and II of the Regulation will come into effect on 14 January 2014.

¹³ Those businesses employing less than 10 persons and whose annual turnover and/or balance sheet does not exceed 2 million euros.

Food and Veterinary Office General Update Audit

73. Members were informed at its January 2013 meeting, that during November 2012 the UK was the subject of a general update audit to follow-up on outstanding recommendations from previous specific feed and food audits. The FVO was provided with a substantial amount of evidence showing the work which had been carried out since 2011 to address the individual recommendations of the audits. The Agency together with VMD and DARD (in Northern Ireland) also attended a meeting with the FVO auditors to answer their questions and provide further clarifications. At the closing meeting the FVO declared that significant progress had been achieved in meeting its recommendations.
74. A further update was provided at the Committee's 8 May meeting. Members were informed that at the end of March 2013, the FVO provided the Agency with a draft version of the updated UK country profile for comment and further updating as necessary. The updated country profile confirms the impression given by the auditors in November 2012 and was published in September 2013.
75. The FVO has signalled its intention to return to the UK during January 2014 to undertake a further audit of official feed controls.

Marketing and Use of Feed

76. Article 24 of Regulation 767/2009 on the marketing and use of feed provides for the establishment of a Community Catalogue of Feed Materials, to ensure harmonised labelling and descriptions. Responsibility for agreeing the content of the Catalogue rests with the European feed industry.
77. Paragraph 1 of Annex I of the Regulation requires that feed materials be free of chemical impurities and processing aids unless a specific maximum content for these is fixed in the Catalogue. The deadline for agreement of these maximum limits was set as 1 September 2012.
78. Members were informed at its May 2013 meeting that negotiations on, and final adoption of, these limits took place in 2012. The resulting revised Catalogue of Feed Materials was published in the Official Journal as Regulation 68/2013 of 16 January 2013. It is available at:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:029:0001:0064:EN:PDF>

79. In addition, the Commission and Member States clarified the definitions for certain feed materials.

Update on BSE Feed Ban (PAP)

80. At its 9 October 2013 meeting, Members received an update on the BSE Feed Ban. Members were informed that on 1 June 2013 EU legislation which permits the feeding of pig and poultry processed animal protein (PAP) to farmed fish came into force.

81. With respect to future changes to the EU TSE legislation, Members learnt that the European Commission had circulated a draft proposal that would permit the use of poultry PAPs in pig feeds and PAP derived from insects for feeding to non-ruminant farmed animals. This was expected to come into force in early 2015, subject to full validation of a DNA test method that can be used for performing routine controls on PAP and compound feed containing PAP. The draft proposal and timetable for implementation were discussed at the TSE WG in Brussels on 5 July 2013. The UK Government does not yet have an agreed position on this proposal.

82. It was noted that the proposal did not cover the use of porcine PAP in poultry feed as the necessary laboratory methods were still under validation, and were not expected to be applied until after 2015.

83. Members were informed of the following issues on the inclusion of insect PAP as feed for non-ruminant farmed animals have been raised by industry:

- how they are obtained;
- how they are reared;
- how they are fed; and
- how they are turned into PAP.

84. Under the current rules insects for rearing would only be permitted to be fed Category 3 material. Feedback from industry suggests that Category 3 materials could be too restrictive and insects would thrive more if allowed to be fed Category 1 organic waste. Another set of issues under discussion is the way insects would be turned into PAP. This includes the type of heat treatment used and compliance with the seven methods under the ABP regulations. All these methods may not be suitable for insects so further consultation with

industry is necessary. Industry feedback suggests that heating method seven would be preferable as it is more flexible.

85. Most Member States (MSs) supported the inclusion of insects. There were some concerns regarding protocols for controlling the rearing and feeding of insects and preventing intra-species recycling, and whether there would be a specific PCR test method to check this. Some MSs also had concerns about other biological risks associated with rearing insects. The Commission's view was that there would be low risk of cannibalism but residues of feed could result in an indirect risk. This could also arise with other species such as farmed fish and is worth further scientific study. The Commission is happy to put this to EFSA when further information is available on rearing practices. The Commission will also liaise with EFSA on the potential other biological/toxicology risks associated with insect rearing methods.
86. The Commission will work with industry and other expert groups to address all the issues raised on insect rearing/controls and circulate an insect roadmap/guide, probably around September/October 2013, which will clearly outline the rules.

ACAF Out of London Meeting



ACAF at it's out of London meeting in Bristol

held in the Ballroom at the Grand by Thistle Hotel, Bristol. Topics discussed included:

87. As part of its commitment to accessibility, each year the Committee holds one of its meetings outside London. The Committee is also keen to continue to make relevant industry visits to enable it to see at first hand the issues it considers. The

Committee's May 2013 meeting was

- Feed Law Enforcement Review Implementation Programme and the revised draft code of practice on feed law;
- Feed Safety – potential gaps – Conclusions;
- Update on Antimicrobial Resistance – Work proposed by the Advisory Committee on microbiology Safety on Food; and
- Pet Food Issues.

88. Information on these issues is set out in more detail in other sections of this report.

Visit to Grimsby



The ACAF Chairman asking questions of the hosts (Mike Hryckowian and Toby Parker)

an invaluable insight into the work and services provided by the organisation. The ACAF Chairman was impressed with the processes that he saw, noting that the plant was extremely sustainable as nothing was wasted. The ACAF Secretariat wishes to thank United Fish Industries (UK) Ltd for their time during the visits.

The ACAF Secretariat and host

89. On 1 March 2013 the ACAF Chairman, the ACAF Secretary and a Member of the Secretariat visited United Fish Industries (UK) Ltd Grimsby factory, this factory produces fishmeal and fish oil from fish by-products originating from factories processing whole fish for human consumption.

90. The visit provided



Induction Training



New Members Stephanie Young, Wendy Harwood and Tim Riley on their induction training at Noble Foods

91. On the 6 September, as part of their induction training, new Members of the Committee: Dr Wendy Harwood (novel biotechnology), Mrs Stephanie Young (Enforcement) and Dr Timothy Riley (lay person) visited sites that produce poultry feed, eggs and egg products.

92. The sites in Newark and Bilsthorpe in Nottinghamshire are part of Noble Foods, a major supplier of eggs and egg products in the UK. The company's business includes all areas of egg production, including everything from the milling of feed to the manufacture of egg products and the processing of end-of-lay hens. The group was given a tour of the company's egg packing plant, a caged poultry farm and a feed mill.

93. Visits like this help inform the Committee's membership about how feed businesses operate and about new technical developments.

94. Members were extremely grateful to Noble Foods for their time during the visits which they found both enjoyable and instructive allowing members to properly appreciate the complex food chain issues from feeding to animal husbandry to egg production.

New Members on their induction training



Forward Work Programme and Horizon Scanning

95. Through correspondence, the Committee conducted an exercise that combined consideration of its Forward Work Programme and other items suggested for horizon scanning. The Committee agree a provisional forward work plan, which included the following new items:

- insects as an alternative feed source; and
- trace element status of feeds.

96. A copy of the Committee's Forward Work Programme is shown at Annex III.

Food Standards Agency – Governance of Science

97. During 2006 the Committee was actively involved in helping to develop good practice guidelines for scientific advisory committees (SACs) that advise the Food Standards Agency. This came on the back of a drive to strengthen systems and processes used for science governance within the Food Standards Agency and making them more transparent.

98. Since its foundation in April 2000, the Food Standards Agency has based its policy decisions on scientific evidence. The network of independent scientific advisory committees that provide external scientific expertise and advice are fundamental to the Food Standards Agency's work and reputation. The Dean Review¹⁴ showed that there was overwhelming support for the Food Standards Agency's policy of basing decisions on scientific evidence, and that this policy should be maintained and developed further. In response, the Food Standards Agency made proposals for strengthening the systems and processes used for science governance and making them more transparent, the development of the Good Practice Guidelines being one of them.

99. At its March 2012 meeting, the General Advisory Committee on Science (GACS) discussed a paper that presented the conclusions of the review of science governance in the FSA, led by the FSA Chief Scientist. The aim of the review was to take stock of key issues, developments and discussions since the last review (in 2006/7) including the Science Review of the FSA and discussions by the GACS, to identify any revisions needed to policy, tools or procedures.

¹⁴ An independent review of the Food Standards Agency conducted by The Rt Hon Baroness Dean of Thornton-le-Fylde in 2005.

100. The Guidelines revised and updated in July 2012, set out in Annex V list the basic principles which are followed by scientific advisory committees such as ACAF when assembling and using scientific advice.

Framework for iteration and dialogue between FSA and the SACs

101. In July 2012 the Food Standards Agency published a framework for iteration and dialogue between FSA and the SACs. The framework set out in Annex VI lists the objectives and boundaries for iteration and dialogue between the FSA and the SACs. It aims to ensure that this dialogue is effective, transparent, and respects the different roles and responsibilities of risk assessment and risk management. The SACs provide independent expert advice on risk assessment and other scientific issues that inform risk management decisions. FSA is responsible for policy and decision making.

Membership

Meet the Members

102. ACAF currently consists of a Chairman and 13 members from wide-ranging backgrounds including consumer affairs, farming, the feed industry and science. Members are appointed in accordance with the Nolan Principles and guidance issued by the Office of the Commissioner for Public Appointments (OCPA), which aim to ensure fairness and transparency in appointments to public bodies. ACAF members and their main areas of expertise are listed below.



Dr Ian Brown (Chairman) is a medically qualified registered specialist in occupational medicine and toxicology. He is also a graduate in agricultural biochemistry and nutrition and has a wide range of knowledge and experience covering occupational health, toxicology, agriculture and food safety. Dr Brown was formally a Consultant Physician in Occupational Medicine and Toxicology at Southampton Universities NHS Trust and is now Director of the Occupational Health Service at the University of Oxford and is also an honorary consultant physician in occupational medicine to the Oxfordshire Primary Care Trust division of public health medicine. He is also Chair of the Pesticide Residues Committee and a member of the Advisory Committee on Toxic Substances of the Health and Safety Commission and a member of the Food Standards Agency's General Advisory Committee on Science. From 1999 to 2005 Dr Brown was a member of ACAF, and from May 2001 until May 2002 served as the Acting Chair, following the unexpected resignation of the Chair, at that time.



Dr Dozie Azubike who left on 30 June 2013 (lay person/consumer) is an Inspector with the Health and Safety Executive. He has a wide range of experience in the voluntary sector and is a member of the Board of the Thames Valley Charitable Housing Association and a lay Magistrate. He is also a member of the General Optical Council Fitness to Practice Committee and an adjudicator for the Solicitors Regulatory Authority.



Ms Angela Booth (feed manufacturer) is a Commercial Services Director for ABN (part of the AB Agri group) a leading British manufacturer of pig and poultry compound feed. She has worked in the UK animal feed industry for over 30 years. She has a BSc in Animal Nutrition from Edinburgh University. Her

current role includes responsibility for nutrition, purchasing, marketing, quality assurance, feed safety and legislation. Ms Booth also has responsibility for feed safety across the whole of AB Agri, which comprises a diverse range of animal nutrition businesses selling compound feed, co-products, premix, feed materials and feed additives to more than 40 countries.



Tim Brigstocke (feed materials) is an independent farm livestock consultant who specialises in animal feeds. He is currently Policy Director for the Royal Association of British Dairy Farmers, Executive Director for Cattle Health Certification Standards (CHeCS) and Chairman of both the Institute of Agricultural Management and the industry wide Cattle Health and Welfare Group. He was until late 2011 Executive Chairman of the Rare Breeds Survival

Trust. Tim serves on a large number of industry bodies including the board of RUMA, and chairs the Society of Biology's College of Elected Members. He is a member of the Veterinary Residues Committee.



Ann Davison (consumer) is an expert on customer insight, consumer engagement and clear communication. She was Defra's consumer advisor, is a member of Defra's Expert Committee on Pesticide Residues in Food (PRiF) and chairs the PRiF's communications sub-committee. Ms Davison is also a member of the British Standards Institute's Consumer and Public Interest Strategic Advisory Committee; a member of the National Consumers Federation and the National Council of Women. Ann was Chair of the Fairtrade Foundation's Certification Committee.



Barrie Fleming (veterinary science) is a partner in a poultry-only practice, St David's Poultry Team. Mr Fleming had nine years' experience in general practice before moving into the pharmaceutical and animal feed additive specialism in 2002, where he remained until 2008 when he joined the St David's Poultry Team. He has broad

veterinary experience involving all domestic species and is a member of several relevant industry committees.



Professor Stephen Forsythe (microbiology) is a Professor of Microbiology at Nottingham Trent University. His main research area is primarily on foodborne infections. He has been an invited participant and speaker at three FAO/WHO risk assessments on the microbiological safety of powdered infant formula. Professor Forsythe has also been a member of the European Food Standards Authority: Additives and Food Contacts Materials Panel, and an ad hoc member on the Qualified Presumption of Safety and Biohaz Panels.



Peter Francis (farmer) is a mixed arable and livestock farmer and a former dairy producer based in West Wales. He has held many positions within the National Farmers Union, including the county Chairman, dairy committee delegate, rural affairs delegate and is currently the Carmarthenshire delegate on the England and Wales Council. Mr Francis sits on the Welsh Assembly Government Appeals Panel for the Single Farm Payment.



Professor Ian Givens (animal nutrition) is a nutritional scientist and Professor of Food Chain Nutrition and Director of the Food Production and Quality Research Division at the University of Reading, School of Agriculture, Policy and Development. He is also leader of the Lipids in the Food Chain research theme within the University's Centre for Food Security.

Within the University he has responsibilities for managing a large research division the work of which focuses on foods produced by animals. His research focuses on the impact of animal derived foods on chronic disease in humans and the potential for their composition to be improved together with aspects of environmental nutrition. He is a Member of the Scientific Advisory Committee to the British Nutrition Foundation and a member of the External Advisory

Committee of the University College Dublin Institute of Food and Health. He is also currently Deputy Chairman of ACAF.



Professor Nigel Halford who left on 30 June 2013

(novel technology) is a Research Leader at Rothamsted Research, the UK's largest crop and agricultural research institute. He has been involved in research using the genetic modification of plants for 30 years. Professor Halford has considerable experience of assessing the risks of GM technology and also has the practical experience of running a field trial on GM wheat. He is the author of more than 120 refereed scientific papers,

many relating to plant biotechnology, and has written and edited books and numerous articles on GM crops.



Dr Wendy Harwood (Novel Biotechnology) has worked for 25 years on the genetic modification of crop plants. She has a first class degree in Biology and a PhD in plant transformation. Dr Harwood is currently responsible for the Crop Transformation Group at the John Innes Centre, Norwich.

Her group focuses on the development of improved genetic modification technology for cereals and Brassica species, the safety assessment of GM crops and the development of crops with improved drought tolerance. She has experience of running GM field trials and her group is responsible for the Biotechnology Resources for Arable Crop Transformation (BRACt) platform that provides transformation resources to research groups world-wide.

Dr Harwood is an honorary lecturer at the University of East Anglia, contributing to undergraduate and post-graduate teaching. She is very active in science communication activities including contributions for television, radio as well as demonstrations, presentations and lectures for a range of interest groups including schools and farmers' organisations. Dr Harwood is an active member of a European Farmer Scientist Network, regularly attending meetings in Brussels where current issues involving GM crops, that impact EU farmers are considered. She sits on several John Innes Centre Committees including the External Relations Steering Group and Biological Safety Committee.



Mrs Christine McAlinden (toxicology) is Associate Director with toXcel International Ltd and is a toxicologist with 20 years' experience; she provides scientific and regulatory advice to the chemical, biotech and pharmaceutical industries. She has a BSc (Honours) in Applied Biology from Nottingham Trent University and obtained certification as a Diplomate American Board of Toxicology. Mrs McAlinden has been on the UK and European Register of Toxicologists since 2001. Between 2003 and 2008, she served on the Education Subcommittee of the British Toxicology Society. She has been a member of the panel for the UK Register of Toxicologists since 2009.



Dr David Peers (animal nutrition) is a Senior Livestock Adviser for ADAS. He has a BSc (Honours) from the University College of Wales, Bangor and has obtained a PhD (Doctorate in Animal Nutrition Research). Dr Peers has wide experience over 40 years of farm livestock consultancy across all species specialising in livestock nutrition and forage production. He has carried out research and development work in livestock nutrition and production, forage production and evaluation and has had 16 papers published in scientific journals. Dr Peers acts an expert in litigation cases. He has also organised and delivered courses on animal nutrition and has provided lectures at local level to farmers, industry and consultancy groups on animal nutrition. Dr Peers has represented ADAS at national and international conferences.



Dr Timothy Riley (lay person) is the Chairman of a biotechnology company and a Non-Executive Director of a health testing company. He also is Executive Chair to Wellstate a health policy and healthcare advisory company.

He has a first class honours degree in Applied Biology and a PhD from Kings' College Cambridge. Following research fellowships in molecular biology at Cambridge and London he moved to the Medical Research Council to administer HIV/AIDS research funding.

Dr Riley joined the Department of Health in 1991 and became a Senior Civil Servant in 1994. Dr Riley held a number of high-level roles including the Head of NHS Public Health Policy and Head of Health Outcomes and Effectiveness. In 2000, Dr Riley moved to the NHS as a Health Authority Executive Director, before being appointed as Chief Executive to a Primary Care Trust. He led three NHS Trusts as Chief Executive over an 11 year period before retiring from the NHS in 2011.

Dr. Riley is a Board member of the National Institute for Health Research, Health Services Research Board and a Member of the NHS Futures Forum, which was launched by the Prime Minister.

In addition to his Non-executive Director roles and health and wellbeing business interests, Dr Riley has resumed more direct management of the beef and lamb livestock farm which he has owned for over 20 years.'



Richard Scales who left on 30 June 2013

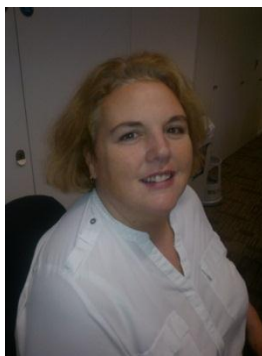
(local authority enforcement) is Principal Trading Standards Officer at Hampshire County Council with up to 22 years' experience of Trading Standards work, including feed law enforcement. He currently specialises in agricultural aspects of enforcement and is a member of the

Agriculture Focus Group of the Local Authorities Co-ordinators of Regulatory Services (LACORS). Mr Scales also chairs the Trading Standards South East Authorities Feeds Sub- Group.



Edwin Snow (feed industry) was for seventeen years employed as the Technical Manager – Milling Division at Noble Foods (the UK's leading egg producer). From the 1st April 2011 he became an independent consultant advising feed and related businesses on quality assurance, hygiene and feed legislation. He is a Member of the Agriculture Industries Confederation's Legal Affairs and Scientific Committee. He is also a

Member of the Royal Society of Chemistry and advises the British Egg Industry Council on all matters relating to feedingstuffs.



Mrs Stephanie Young (Enforcement) is a Trading Standards Practitioner and has been employed in an enforcement capacity for the past 17 years, prior to

which she was employed in the farming industry. She holds formal qualifications in Management, Agriculture, Trading Standards, Animal Health, Investigative Practice and HACCP. She has recently obtained a BA (Hons) degree in Business Management.

Mrs Young is the Chairperson of the National Animal Health and Welfare Panel and was until 2011, the Chair of the Central England Feed Enforcement Group. She is the Secretary to the Central England Animal Health and Welfare Group. Mrs Young sits on two Defra Groups: the On-Farm Steering Group and the Defra TB Compliance and Enforcement Group. She has participated in a number of Food and Veterinary Office Audits both at local and national level representing Staffordshire County Council and local authorities for England and is a Lead Officer for the Trading Standards Institute.

In her role at Staffordshire County Council, Mrs Young oversees enforcement work relating to feed law and animal health. She is the Primary Authority Officer for the largest renderer in the country.

Current Terms of Office of ACAF Members

103. To ensure continuity, re-appointments to ACAF (usually for periods of three years) are staggered so that only a proportion of the membership falls vacant each year. The terms of office of ACAF members are as follows:

Until 30 June 2013

Dr Dozie Azubike (Lay person)
Professor Nigel Halford (Novel technology)
Mr Richard Scales (Local authority enforcement)

Until 31 August 2013

Professor Stephen Forsythe* (microbiology)

Until 8 May 2014

Dr Ian Brown (Chairman)
Mr Barrie Fleming (Veterinary Science)

Until 31 May 2014

Professor Ian Givens (Animal Nutrition)

Until 30 June 2014

Mr Tim Brigstocke (Feed materials)

Mr Edwin Snow (Feed Industry)

Until 31 August 2014

Ms Angela Booth (Feed manufacturer)*

Until 30 November 2014

Dr David Peers (Animal Nutrition)*

Mrs Christine McAlinden (Toxicology)*

Until 31 August 2015

Ms Ann Davison*

Mr Peter Francis*

Until 30 September 2016

Dr Wendy Harwood*

Dr Timothy Riley*

Mrs Stephanie Young*

* first term of office

Appointments 2013

104. Dr Timothy Riley was appointed as the Committee's lay person, Dr Wendy Harwood as the novel biotechnology representative and Mrs Stephanie Young was appointed as the Committee's enforcement representative. The terms of appointment for all three Members' run from 1 October 2013 until 30 September 2016.

End of appointments 2013

105. The Committee said goodbye to Dr Dozie Azubike (lay person), Professor Nigel Halford (Novel Biotechnology) and Mr Richard Scales (enforcement representative). The Committee, the Food Standards Agency and the devolved

countries were extremely grateful for these Members' commitment and input to the work of ACAF and wished them every success in the future.

ACAF Secretariat

106. The Committee's secretariat is staffed by officials from the Food Standards Agency.



From left to right – Ray Smith, Mandy Jumnoodoo, Keith Millar, Raj Pal, Saleha Khatun and Stephanie Cossom.

The Committee's Commitment to Openness

107. ACAF is committed to a policy of openness and engagement with stakeholders. Copies of agendas, papers, advice, reports and minutes of meetings can be found on the Committee's website at:

<http://acaf.food.gov.uk>

108. Paper copies of these documents can be obtained by contacting the ACAF Secretariat at the address shown at paragraph 6.
109. The nature of the expertise and experience required for ACAF membership means that some members have links with the feed industry, farming and other relevant sectors. Details of members' interests can be found in the Register of Members' Interests at Annex VII. These details are regularly updated in the on-line version of the Register on the website. ACAF members are required to declare all relevant interests in writing when they are appointed and are reminded to update as necessary at the beginning of each meeting. Members are also required to declare any direct commercial interests, or those of close family members, in matters under discussion at each meeting. This declaration is recorded in the minutes of meetings, which are freely available to members of the public.
110. The Committee held all three of its meetings in 2013 in open session, one of which was in Bristol. These meetings were attended by observers from a range of stakeholders. Observers were not allowed to contribute to discussions, but were able to ask questions at the end of the meeting. ACAF is committed to continue to hold open meetings. Following each open meeting observers are canvassed for their views on the subject matter and conduct of the meeting.

Annex I

Request for Information on ACAF

Information on ACAF can be found on its website. If you do not have internet access and would like to receive further information about the work of the Committee *free of charge* please complete and return the form below:

Name: -----

Address: -----

Company/Organisation: -----

Please send me the following ACAF papers as they become available:

(tick as appropriate)

Minutes of meetings

☐

Annual & other reports

☐

News Releases

☐

Consultation documents

☐

ACAF recruitment exercises

☐

Other information
(please specify)

☐

Please return your completed form to:

The Food Standards Agency

ACAF Secretariat

Room 1B

Aviation House

125 Kingsway

London WC2B 6NH

Tel: 020 7 276 8083

Fax: 020 7 276 8289

Email: acaf@foodstandards.gsi.gov.uk

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Annex II

Papers Considered by ACAF in 2013

NO. OF PAPER	NAME OF PAPER	MEETING NUMBER	DATE OF MEETING
ACAF/13/01	Balance of Competence Review	60th	16 January 2013
ACAF/13/01A	Balance of Competence Review (presentation)	60th	16 January 2013
ACAF/13/02	Review of Official Controls on Feed.	60th	16 January 2013
ACAF/13/03	Feed Safety – potential gaps – awareness and competence of feed business advisers.	60th	16 January 2013
ACAF/13/04	Feed Safety – potential gaps – Imports.	60th	16 January 2013
ACAF/13/05	Residues of packaging in former foodstuffs.	60th	16 January 2013
ACAF/13/06	Update on Feed Additives	60th	16 January 2013
ACAF/13/07	EU Developments.	60th	16 January 2013
ACAF/13/08	Update on the work of other Advisory Committees.	60th	16 January 2013
ACAF/13/09	Antimicrobial Resistance – Summary of Royal Colleges of Veterinary Surgeons, Physicians and Pathologists conference 2 October 2012	60th	16 January 2013
ACAF/13/10	Inter-sessional Paper on the use of copper sulphate as a veterinary medicine		
ACAF/13/11	TSE Update	60th	16 January 2013
ACAF/13/12	Feed Law Enforcement Review Implementation Programme	61st	8 May 2013
ACAF/13/13	Feed Safety – potential gaps – Conclusions	61st	8 May 2013
ACAF/13/14	Pet food Issues	61st	8 May 2013
ACAF/13/15	EU Developments;	61st	8 May 2013

ACAF/13/16	Update on the work of other Advisory Committees	61st	8 May 2013
ACAF/13/17	Revised Feed Law Code of Practice	61st	8 May 2013
ACAF/13/18	Intersessional Paper: Forward Work Plan		26 July 2013
ACAF/13/18 add 1	Intersessional Paper: Forward Work Plan		19 August 2013
ACAF/13/19	Intersessional Paper: Review of Gaps in the feed chain: summary of findings and conclusions		13 August 2013
ACAF/13/20	Iodine in Animal Feed	62nd	9 October 2013
ACAF/13/21	Insects as a potential source of animal feed	62nd	9 October 2013
ACAF/13/22	Consumer Engagement	62nd	9 October 2013
ACAF/13/23	Feed Law Enforcement Review Implementation Programme	62nd	9 October 2013
ACAF/13/24	Update on Official Controls 882/2004	62nd	9 October 2013
ACAF/13/25	EU Developments	62nd	9 October 2013
ACAF/13/26	Update on the work of other Advisory Committees	62nd	9 October 2013
ACAF/13/27	GM Update	62nd	9 October 2013
ACAF/13/28	Intersessional Paper: Review of Gaps in the feed chain: summary of findings and conclusions		14 November 2013
ACAF/13/29	Intersessional Paper: Forward Work Plan		25 November 2013
ACAF/13/30	Review of Gaps in the feed chain: summary of findings and conclusions		10 December 2013
ACAF/13/31	Provisional Forward Work Plan		11 December 2013

ACAF Forward Work Programme

High Priority - position of ACAF to be considered proactively

Item no.	Topic	Progress
1	Feed Incidents and related issues.	At its June 2012 meeting the Committee received a presentation from officials of the Department of Agriculture and Rural Development on Feed Incident Management in Northern Ireland from an enforcement perspective. The presentation 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.
2	Recommendations from Food and Veterinary Office (FVO) audit to UK on feed law enforcement.	<p>The Committee was informed at its December 2011, March, June and September 2012 meetings 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 intends to conduct its next audit of UK feed enforcement in January 2014.</p>
3	Antimicrobial Resistance	<p>The Committee received a presentation on this issue at its September 2012 meeting. It agreed this topic was complex and it wished to explore the issues at a future meeting, where it could discuss the available evidence to support whether antimicrobial resistance was a significant issue for animal feed.</p> <p>At its May 2013 meeting a Member of the Committee informed ACAF Members that they been invited to be a Member of an Advisory Committee on Microbiological</p>

		Safety of Food Working Group on antimicrobial resistance. The Member agreed to keep ACAF Members informed on the Working Group's discussions.
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Medium Priority - position of ACAF responsive to developments and considered regularly:

4	Trace element status of Feeds	There is some concern that changes in feed manufacture (including those related to revised feed legislation) that might lead to inadequate nutrient supply to humans. Key issues currently are 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. The Committee was informed that the Scientific Advisory Committee on Nutrition was considering the issue of iodine in health at its meeting held on 9 October 2013. ACAF Members agreed that it would be beneficial if the two Committees should work together on the issue of iodine.
5	Feed Safety – Potential Gaps	<p>At its 1 June 2011 meeting, the Committee was asked to consider potential safety gaps in the feed sector. It agreed to consider in further detail the following:</p> <p>identification of feed businesses; awareness/competence of feed business operators (FeBOs); and imports.</p> <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 Animal Science on work they are carrying 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</p>

		in the feed sector. These will be published later in 2013.
6	New Developments in feed for livestock species (including aquaculture).	<p>The Committee will continue to be updated on developments and will be asked for advice as required.</p> <p>The Committee received a presentation on work being carried out by FERA on insect protein as potential animal feed at its 9 October 2013 meeting. The Committee agreed it was keen to receive further updates on the work being carried out by FERA. The Committee will receive a presentation in 2014 on work being carried out by NIAB to develop a new type of wheat which could increase productivity by 30% offering greater yields.</p>
7	Work of EFSA, including opinions on additives and contaminants relating to animal feed.	The Secretariat will continue to draw relevant EFSA Opinions and documents to the attention of ACAF for discussion.
8	<p>The manipulation of animal diets to enhance the nutritional value of 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 on 24 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>

		This subject area will be revisited from time to time.
9	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>
10	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>During 2013 ACAF Members and the Secretariat have worked with the Advisory Committee on Microbiological Safety of Food (antimicrobial issues) and the Advisory Committee on Novel Food and Processes (GM Feed).</p>
11	Microbiological issues	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 the European Food Safety Authority and as set out in the UK Code of Practice, would be preferable to amendment of the Feed Hygiene Regulation.
12	Brominated flame retardants (BFRs)	The Committee received a presentation on this issue at its 14 December 2011 meeting. It recommended that, with respect to further work the Agency proposes to undertake on this subject, specific areas should be considered, including investigating where the entry points of contamination might be for foods that were found to contain high levels of BFRs during food surveys, notably farmed fish and dairy products. The Committee also suggested that the Agency should extend any relevant investigations to cover feed.

		A tendering exercise for a research project into BFRs in feed and food is now underway.
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Low Priority - items to be kept under observation but major changes not expected.

13	Feed issues relating to organic production.	The Committee received an update on UK negotiations on organic farming at its December 2011 meeting. The Committee agreed that this was an important issue and requested it be kept informed of developments.
14	<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 3 March and 3 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 discussed updating 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>
15	<p>Food/feed security:</p> <ul style="list-style-type: none"> a) climate change and the impact on feed production; b) animal production including feeding systems and the effect on the environment; and c) global demand for animal derived foods and prices for primary production. 	<p>During 2010, the Committee received presentations from Professor Tim Wheeler (University of Reading/Deputy Chief Scientific advisor to the Department for International Development) and Professor Chris Reynolds (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. The Committee agreed it would like to explore this area further at a future meeting. It was agreed that the Secretariat should</p>

		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.
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Proposed New Work

16.	Proposed revision of the ACAF Review of On-Farm Feeding Practices.	The Committee is to consider whether it is appropriate to revise its Review of On-Farm Feeding Practices which was published in September 2003, at its February 2014 meeting.
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Periodical update items

17.	GM issues including future developments in biotechnology (e.g. use of second generation GMOs) and possible links with GM nutritional work.	<p>The Committee receives regular update reports from the Secretary on EU developments; these 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>
18.	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.
19.	Feed additive developments and issues	<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>An EFSA opinion on the re-assessment of</p>

		<p>vitamin A is still awaited (an issue of particular interest to ACAF).</p> <p>A representative from the University of Hertford is to provide the Committee with a presentation in 2014 on their work on additives and reduction of emissions.</p>
20.	Updates on BSE and TSE developments.	<p>An update on TSE and Meat and Bone meal 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 their wish to receive updates and monitor developments in respect of the European Commission's draft proposal to establish new criteria for feeding non-ruminant 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 its September 2012 meeting.</p> <p>Members agreed that this item should remain on its work plan and be periodically reviewed.</p>

GOOD PRACTICE GUIDELINES FOR THE INDEPENDENT SCIENTIFIC ADVISORY COMMITTEES

PREAMBLE

The Government Chief Scientific Adviser's *Guidelines on the Use of Scientific and Engineering Advice in Policy Making*¹⁵ set out the basic principles which government departments should follow in assembling and using scientific advice. The key elements are to:

- **identify early** the issues which need scientific and engineering advice and where **public engagement** is appropriate;
- draw on a **wide range of expert advice** sources, particularly when there is uncertainty;
- adopt an **open and transparent approach** to the scientific advisory process and publish the evidence and analysis as soon as possible;
- **explain publicly the reasons for policy decisions**, particularly when the decision appears to be inconsistent with scientific advice; and
- **work collectively** to ensure a joined-up approach throughout government to integrating scientific and engineering evidence and advice into policy making.

The *Code of Practice for Scientific Advisory Committees*¹⁶ and the Principles of Scientific Advice to Government¹⁷ provide more detailed guidance on the operation of scientific advisory committees (SACs) and their relationship with their sponsor Departments.

The Food Standards Agency's Board adopted a **Science Checklist** in 2006 (updated in 2012) that makes explicit the points to be considered in the preparation of policy papers and proposals dealing with science-based issues, including those which draw on advice from the SACs.

These **Good Practice Guidelines** were drawn up in 2006 by the Chairs of the independent SACs that advise the FSA based on, and complementing, the Science Checklist. They were updated in 2012 in consultation with the General Advisory Committee on Science (GACS).

¹⁵ <http://www.bis.gov.uk/assets/bispartners/goscience/docs/g/10-669-gcsa-guidelines-scientific-engineering-advice-policy-making.pdf>

¹⁶ <http://www.bis.gov.uk/assets/BISPartners/GoScience/Docs/C/11-1382-code-of-practice-scientific-advisory-committees.pdf>

¹⁷ <http://www.bis.gov.uk/go-science/principles-of-scientific-advice-to-government>

The Guidelines apply to the SACs that advise the FSA and for which the FSA is sole or lead sponsor Department:

- Advisory Committee on Animal Feedingstuffs
- Advisory Committee on Microbiological Safety of Foods
- Advisory Committee on Novel Foods and Processes
- Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment¹⁸
- Committee on Mutagenicity of Chemicals in Food, Consumer Products and the Environment¹¹
- Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment¹⁹
- Social Science Research Committee
- General Advisory Committee on Science

For the SACs with a shared sponsorship the Guidelines apply formally to their advice to the FSA; they may opt to follow them also in advising other sponsor Departments.

All these committees share important characteristics. They:

- are independent;
- work in an open and transparent way; and
- are concerned with risk assessment and/or science governance, not with decisions about risk management.

The Guidelines relate primarily to the risk assessment process since this is the main purpose of most of the SACs. However, the SACs may, where appropriate, comment on risks associated with different risk management options, highlight any wider issues raised by their assessment that they feel should be considered (distinguishing clearly between issues on which the SAC has an expert capability and remit, and any other issues), or any evidence gaps and/or needs for research or analysis.

In addition, GACS and SSRC may advise the FSA on aspects of the governance of risk management, or on research that relates to risk management.

Twenty nine principles of good practice have been developed. However, the different committees have different duties and discharge those duties in different ways. Therefore, not all of the principles set out below will be applicable to all of the committees, all of the time.

¹⁸ Joint FSA/HPA Secretariat, HPA lead

¹⁹ Joint FSA/HPA, FSA lead

The SACs have agreed to review their application of the principles annually and report this in their Annual Reports. Compliance with the Guidelines will also be covered in the annual self assessments by Members and annual feedback meetings between each SAC Chair and the FSA Chief Scientist.

PRINCIPLES

Defining the problem and the approach

1. The FSA will ensure that issues it asks an SAC to address are clearly defined and take account of stakeholder expectations in discussion with the SAC Secretariat and where necessary the SAC Chair. The SAC Chair will refer back to the FSA if discussion suggests that further iteration and discussion of the task is necessary. Where an SAC proposes to initiate a piece of work the SAC Chair and Secretariat will discuss this with FSA to ensure the definition and rationale for the work its expected use by the FSA are clear.

Seeking input

2. The Secretariat will ensure that stakeholders are consulted at appropriate points in the SAC's considerations. It will consider with the FSA whether and how stakeholder views need to be taken into account in helping to identify the issue and frame the question for the committee.
3. Wherever possible, SAC discussions should be held in public.
4. The scope of literature searches made on behalf of the SAC will be clearly set out.
5. Steps will be taken to ensure that all available and relevant scientific evidence is rigorously considered by the committee, including consulting external/additional scientific experts who may know of relevant unpublished or pre-publication data.
6. Data from stakeholders will be considered and weighted according to quality by the SAC.
7. Consideration by the Secretariat and the Chair (and where appropriate the whole SAC) will be given to whether expertise in other disciplines will be needed.
8. Consideration will be given by the Secretariat or by the SAC, in discussion with the FSA, as to whether other SACs need to be consulted.

Validation

9. Study design, methods of measurement and the way that analysis of data has been carried out will be assessed by the SAC.

10. Data will be assessed by the committee in accordance with the relevant principles of good practice, e.g. qualitative social science data will be assessed with reference to guidance from the Government's Chief Social Researcher²⁰.
11. Formal statistical analyses will be included wherever appropriate. To support this, each SAC will have access to advice on quantitative analysis and modelling as needed.
12. When considering what evidence needs to be collected for assessment, the following points will be considered:
 - the potential for the need for different data for different parts of the UK or the relevance to the UK situation for any data originating outside the UK; and
 - whether stakeholders can provide unpublished data.
13. The list of references will make it clear which references have been subject to external peer review, and which have been peer reviewed through evaluation by the Committee, and if relevant, any that have not been peer reviewed.

Uncertainty

14. When reporting outcomes, SACs will make explicit the level and type of uncertainty (both limitations on the quality of the available data and lack of knowledge) associated with their advice.
15. Any assumptions made by the SAC will be clearly spelled out, and, in reviews, previous assumptions will be challenged.
16. Data gaps will be identified and their impact on uncertainty assessed by the SAC.
17. An indication will be given by the SAC about whether the evidence base is changing or static, and if appropriate, how developments in the evidence base might affect key assumptions and conclusions.

Drawing conclusions

18. The SAC will be broad-minded, acknowledging where conflicting views exist and considering whether alternative interpretations fit the same evidence.
19. Where both risks and benefits have been considered, the committee will address each with the same rigour, as far as possible; it will make clear the degree of rigour and uncertainty, and any important constraints, in reporting its conclusions.
20. SAC decisions will include an explanation of where differences of opinion have arisen during discussions, specifically where there are unresolved issues,

²⁰ Quality in Qualitative Evaluation: A Framework for assessing research evidence http://www.civilservice.gov.uk/wp-content/uploads/2011/09/a_quality_framework_tcm6-7314.pdf; The Magenta book http://www.hm-treasury.gov.uk/d/magenta_book_combined.pdf

and why conclusions have been reached. If it is not possible to reach a consensus, a minority report may be appended to the main report, setting out the differences in interpretation and conclusions, and the reasons for these, and the names of those supporting the minority report.

21. The SAC's interpretation of results, recommended actions or advice will be consistent with the quantitative and/or qualitative evidence and the degree of uncertainty associated with it.
22. SACs will make recommendations about general issues that may have relevance for other committees.

Communicating SACs' conclusions

23. Conclusions will be expressed by the SAC in clear, simple terms and use the minimum caveats consistent with accuracy.
24. It will be made clear by the SAC where assessments have been based on the work of other bodies and where the SAC has started afresh, and there will be a clear statement of how the current conclusions compare with previous assessments.
25. The conclusions will be supported by a statement about their robustness and the extent to which judgement has had to be used.
26. As standard practice, the SAC secretariat will publish a full set of references (including the data used as the basis for risk assessment and other SAC opinions) at as early a stage as possible to support openness and transparency of decision-making. Where this is not possible, reasons will be clearly set out, explained and a commitment made to future publication wherever possible.
27. The amount of material withheld by the SAC or FSA as being confidential will be kept to a minimum. Where it is not possible to release material, the reasons will be clearly set out, explained and a commitment made to future publication wherever possible.
28. Where proposals or papers being considered by the FSA Board rest on scientific evidence produced by a SAC, the Chair of the SAC (or a nominated expert member) will be invited to the table at the Open Board meetings at which the paper is discussed. To maintain appropriate separation of risk assessment and risk management processes, the role of the Chairs will be limited to providing an independent view and assurance on how their committee's advice has been reflected in the relevant policy proposals, and to answer Board Members' questions on the science. The Chairs may also, where appropriate, be invited to provide factual briefing to Board members about particular issues within their committees' remits, in advance of discussion at open Board meetings.
29. The SAC will seek (and FSA will provide) timely feedback on actions taken (or not taken) in response to the SAC's advice, and the rationale for these.

Framework for iteration and dialogue between FSA and the SACs

The objectives and boundaries for iteration and dialogue between FSA and SACs are:

At the start of a task, to:

- ensure that SACs are aware of the context of requests put to them by the FSA (including whether the SAC advice will feed directly into a Board decision or update an assessment that underpinned a previous decision)
- where the SAC is initiating a task itself, to ensure that FSA and the SAC are clear on the rationale and the expected use of the outcome by FSA
- to ensure that the question to be considered by the SAC(s) is clear and appropriate (in turn helping to ensure that outputs of SACs will be useful for the FSA)
- to ensure that the approach proposed is appropriate and proportionate to the issue and the intended use of the SAC's advice
- to ensure that SACs are not asked, and do not attempt, to address issues that are not part of their remit, for example decisions on risk management
- to help FSA to identify at the outset the factors it will need to consider in weighing up options for risk management, and to select appropriate means to address these: issues for risk assessment by the appropriate risk assessors (if more than one is relevant, the respective tasks can be planned in a co-ordinated way); other factors to be addressed through other processes, and as far as possible by other types of evidence-based analysis.

At handover of an SAC opinion to FSA:

- for SACs to give indications of the certainty of scientific evidence and to address any variation in that evidence and the basis of 'unorthodox' opinion among experts (so that risk managers are aware of the confidence attached to the SACs' assessments and advice)
- for SACs to help to identify and assess risks associated with different risk management options (if not identified at the start, for example if options arise or develop after the original task for risk assessment is defined, or if new or unintended consequences of different risk management options emerge)
- for the SAC to highlight any wider issues raised by their assessment that they feel should be considered (distinguishing clearly between issues on which the SAC has an expert capability and remit, and any other issues)

- for SACs to highlight any evidence gaps, minority scientific opinions and/or needs for research or analysis and give an indication of their priority; to help to develop detailed research requirements; and to contribute to interpretation and evaluation of research results
- to help ensure that the risk assessment is understood by the risk managers, and used accurately in weighing and communicating risk management decisions

In feedback and review, to:

- to ensure SACs are informed in a timely manner on how their advice and recommendations (including on risk assessment or research needs) have been acted on, or not, and the reasons behind this, and that SACs can comment on this, especially when the action deviates from any explicit advice provided by SACs
- to provide feedback for both sides to help to improve procedures and practices

Register of Members' Interests

MEMBER	COMPANY/ ORGANISATION	NATURE OF INTEREST	COMPANY/ ORGANISATION	NATURE OF INTEREST
Dr D Azubike	Defra, Agricultural Dwelling House Advisory Committee (ADHAC) for Berkshire, Buckinghamshire, Hampshire, Isle of Wight and Oxfordshire.	Independent Member	None	None
Ms Angela Booth	AB Agri	Divisional Director	Agricultural Industries Confederation Feed Executive Committee	Member
	20ha grass farm	Partner	FEFAC Council	Member
			FEMAS Steering Group	Chairman
			Assured Food Standards Pigs Technical Committee	Member
			Steering Board for two EU funded projects	Member
Dr I Brown	Pesticide Residues Committee	Chairman	None	None
	Advisory Committee on Toxic Substances of the Health & Safety Commission	Member		
	Responsible Use of Medicines in Agriculture	Member		
	General Advisory Committee on Science	Ex officio Member		
Mr T	Tim Brigstocke Associates	Managing Partner	Royal Association of	Policy Director

Brigstocke			British Dairy Farmers	
	Cattle Health Certification Standards (UK)	Exec. Director	National Equine Forum	Chairman
	Veterinary Residues Committee	Member	National Cattle Association (Dairy)	Executive Secretary
	Society for the Environment	Director/Trustee	Silcock Fellowship for Livestock Research	Trustee
	Cattle Health & Welfare Group	Chairman	RUMA Alliance	Director/Hon Treasurer
			Lantra, the Sector Skills Council for the land based sector;	Trustee;
Ms Ann Davison	National Consumer Federation	Member	None	None
	National Council of Women	Member		
Mr B Fleming	St David's Poultry Team	Partner	British Veterinary Poultry	Honorary Secretary and Awards Co-ordinator
Professor S J Forsythe	School of Science and Technology, Nottingham Trent University	Employee	None	None
	Mead Johnson	expert witness		
Mr P Francis	National Farmers Union	County Delegate and Member of Management Board	None	None
	Welsh Assembly Government - Appeals Panel for agriculture	Member		
	Young Farmers Club	Club Leader		

Professor D I Givens	University of Reading	Employee	European Commission	Research funder
	European Food Safety Authority Working Group	Ad hoc expert	Various Companies	Research funders
	British Nutrition Foundation Scientific Advisory Committee	Member		
	University College Dublin Institute of Food and Health, Scientific Advisory Panel	Member		
	Estonian Biocompetance Centre of Healthy Dairy Products Scientific Panel	Expert assessor		
	Nutrition Society	Member		
	British Society of Animal Science	Member		
	Society of Biology	Member		
	Aberystwyth University (IBERS) Science and Impact Advisory Board	Member		
Dr N G Halford	Association of Applied Biologists	Trustee, council member, convenor	Advanced Technologies Cambridge	Research partners
	American Chemical Society	Member	Kettle Foods	Research partners
	Imperial College Press;	Publisher;	Higgins Agriculture	Research partners
			Potato Processors Association	Research partners
			United Biscuits	Research partners

			European Snacks Association/SNACMA	Research partners
			The Potato Council	Research partners
			TESCO stores	Research partners
			ConAgra	Research partners
			University of Reading	Research partners
			Scottish Crop Research Institute	Research partners
			Jordans/Ryvita	Research partners
			DEFRA LINK	Research partners
			Home Grown Cereals Authority	Studentship
			Royal Society of Chemistry	Publishers
			Shanghai Academy of Agricultural Sciences	Honorary chair
			University of Nottingham;	Special professorship;
Dr Wendy Harwood	John Innes Centre	Employee	Genetics Society	Member
	Arable Farm/Essex	Partner	Association of Applied Biologists	Member
	Arable Farm/Essex	Joint Owner	Eucarpia	Member

			Plantcell reports	Editor
			Enterprise Ireland	Reviewer for commercialisation fund (fee-paid)
Mrs C McAlinden	Toxcel International Ltd	Employee	None	None
	British Toxicology Society	Member		
	UK Register of Toxicologist	Panel Member		
Dr D G Peers	ADAS UK Ltd	Various consultancy contracts	None	
	Various Farm Businesses	Nutrition Consultancy		
Timothy Riley	Stoney Royd Farm Commercial Beef and Lamb Production	Owner/Farmer	Wellstate Ltd	Director (now renumeralated) and Shareholder
			Wellstate HTA Ltd	Director and Shareholder
			Better 2 Know Ltd	Director (renumerated)
			Arcis: Altos Group Ltd	Director (Chairman) (renumerated)
			National Institute for Health Research (NIHR)	Member of Grant Giving Board (Health Services Research)
Mr R Scales	Agriculture Focus Group of the Local Authorities Co-ordinators of Regulatory Services	Member	None	None

	Trading Standards South East Feeds Subgroup	Chairman		
	Diploma in Consumer Affairs and Trading Standards Agriculture paper within TSSE region	Lecturer		
Mr E Snow	Independent Consultant to feed industry	Self Employed	Elanco - advising Elanco customers on residue controls during feed production	Member
	Tate & Lyle	Shareholder		
	Noble Foods	Consultant		
	British Egg Industry Council - feed related matters	Consultant		
Mrs Stephanie Young	Principal Trading Standards Officer - Animal Health Staffordshire County Council	Employee	None	None

Abbreviations

ACAF	Advisory Committee on Animal Feedingstuffs
ACMSF	Advisory Committee on Microbiological Safety of Food
ADHAC	Agricultural Dwelling House Advisory Committee
AIC	Agricultural Industries Confederation
AIDS	Acquired Immunodeficiency Syndrome
BASIS	an independent standards setting and auditing organisation for the pesticide, fertiliser and allied industries
BBSRC	Biotechnology and Biological Sciences Research Council
BFR	Brominated Flame Retardant
BIOHAZ	EFSA Panel on Biological Hazards
BRACT	Biotechnology Resources for Arable Crop Transformation
BSAS	British Society of Animal Science
BSc	Bachelor of Science
BSE	Bovine Spongiform Encephalopathy
CHeCS	Cattle Health Certification Standards
CPD	Continuing Professional Development
DARD	Department of Agriculture and Rural Development (Northern Ireland)
Defra	Department for Environment, Food and Rural Affairs
DG SANCO	Directorate General for Health and Consumer Affairs.
DNA	Deoxyribonucleic acid
EC	European Community
EFSA	European Food Safety Authority
EU	European Union
FACTS	Fertiliser Advisers Certification and Training Scheme
FAO	Food and Agriculture Organisation
FeBO	Feed Business Operator
FEDIAF	European Pet Food Industry
FEEDAP	The Panel on Additives and Products or Substances used in Animal Feed
FEFAC	European Feed Manufacturers' Federation
FEMAS	Feed Materials Assurance Scheme
FERA	Food and Environment Research Agency
FVO	Food and Veterinary Office
FSA	Food Standards Agency
GACS	General Advisory Committee on Science
GHG	Greenhouse gas
GM	Genetically modified

GMO	Genetically modified organism
HACCP	Hazard Analysis Critical Control Point
HIV	Human immunodeficiency virus infection
LACORS	Local Authorities Co-ordinators of Regulatory Services
MoU	Memoranda of Understanding
MSs	Member States
NIAB	National Institute of Agricultural Botany
NFU	National Farmers Union
OCPA	Office of the Commissioner for Public Appointments
PAP	processed animal protein
parnuts	Foods for Particular Nutritional Use
PFMA	Pet Food Manufacturers Association
PhD	Doctor of Philosophy
PIPR	Pig Industry Professional Register
PRiF	Defra Expert Committee on Pesticide Residues in Food
PUFAs	Polyunsaturated fatty acids
RUMA	Responsible Use of Medicine in Agriculture Alliance
SAC	Scientific Advisory Committee
SACN	Scientific Advisory Committee on Nutrition
SCoFCAH	Standing Committee on Food Chain and Animal Health
SSRC	Social Science Research Committee
TB	Tuberculosis
TSE	Transmissible Spongiform Encephalopathy
UFAS	Universal Feed Assurance Scheme
UK	United Kingdom
VMD	Veterinary Medicines Directorate
WG	Working Group
WHO	World Health Organisation

CODE OF PRACTICE FOR MEMBERS OF THE ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

Public service values

1. Members of the Advisory Committee on Animal Feedingstuffs must at all times:

- observe the highest standards of **impartiality, integrity** and **objectivity** in relation to the advice they provide and the management of this Committee;
- be **accountable** through Ministers, to Parliament and the public for its activities and the standard of advice it provides; and
- in accordance with the Government policy on **openness**, comply fully with the Code of Practice on Access to Government Information.

2. The Ministers of the sponsoring departments (the Food Standards Agency, DEFRA, Department of Agriculture and Rural Development for Northern Ireland, Scottish Government and Welsh Government) are answerable to their respective Parliaments for the policies and performance of this Committee, including the policy framework within which it operates.

Standards in Public Life

3. All Committee members must:

- follow the Seven Principles of Public Life set out by the Committee on Standards in Public Life (see Appendix I);
- comply with this code, and ensure they understand their duties, rights and responsibilities, and that they are familiar with the function and role of the Advisory Committee on Animal Feedingstuffs and any relevant statements of Government policy. New Committee members should consider the need for relevant training;
- not misuse the information gained in the course of their public service for personal gain or political purpose, nor seek to use the opportunity of public service to their private interests or those of connected persons, firms' businesses or other organisations;

- not misuse the influence gained in the course of their public service for personal gain, political purpose or promoting personal views; and
- not hold any paid or high-profile unpaid posts in a political party, and not engage in specific political activities on matters directly affecting the work of this Committee. When engaging in other political activities, Committee members should be conscious of their public role and exercise proper discretion. These restrictions do not apply to local Councillors.

Conditions of appointment and termination of appointment

4. Committee appointments can be terminated early by either party, by giving 3 months notice, in writing.
5. Should the Committee be disbanded before the end of the period of appointment, appointments will terminate on dissolution.
6. In the event that a member is found guilty of grave misconduct their appointment will be terminated immediately
7. Appointments are held subject to compliance with the Public Standards Committee Seven Principles of Public Life.
8. Members are expected to attend meetings regularly. The appointment may be terminated, without notice, if attendance becomes so erratic as to interfere with the good running of the Committee.

Role of Committee members

9. Members of the Advisory Committee on Animal Feedingstuffs have collective responsibility for the operation of the Committee. They must:
 - engage fully in collective consideration of the issues, taking account of all relevant factors, including any guidance issued by the sponsor departments or the responsible Ministers;
 - ensure that the Code of Practice on Access to Government Information is adhered to;
 - agree an Annual Report and, where appropriate, provide suitable opportunities to open up the work of the Committee to public scrutiny;

- not divulge any information that is provided to the Committee in confidence;
- respond appropriately to complaints, if necessary with reference to the sponsor departments; and
- ensure that the Committee does not exceed its powers or functions.

10. Communication between the Committee and Ministers will generally be through the Chair, except where the Committee has agreed that an individual member should act on its behalf. Nevertheless, any Committee member has the right of access to Ministers on any matter, which he or she believes raises important issues relating to his or her duties as a Committee member. In such cases the agreement of the rest of the Committee should normally be sought.

11. Individual members can normally be removed from office by Ministers if they fail to perform the duties required of them in line with the standards expected in public office.

Role of the Chair

12. The Chair has particular responsibility for providing effective leadership on the issues above. In addition the Chair is responsible for:

- ensuring that the Committee meets at appropriate intervals, and that the minutes of meetings and any reports to Ministers accurately record the decisions taken and, where appropriate, the views of individual members;
- representing the views of the Committee to the general public; and
- ensuring that new Committee members are briefed on appointment (and their training needs considered), and providing an assessment of their performance, on request, when members are considered for re-appointment to the Committee or for appointment to the Committee of some other public body.

Handling conflicts of interests

13. The purpose of these provisions is to avoid any danger of Committee members being influenced, or appearing to be influenced, by their private interests in the exercise of their public duties. All Committee members should therefore

declare any personal or business interests which may, or may be *perceived* (by a reasonable member of the public) to influence their judgement. Members' interests will be recorded in a register of interests which should be kept up to date and open to the public. A guide to the types of interest which should be declared and how to declare them is at Appendix II.

Declaration of interests to the Secretariat

14. Members of the Committee should inform the Secretariat in writing of their current personal and non-personal interests, when they are appointed, including the principal position(s) held. Only the name of the company and the nature of the interest is required, the amount of any salary etc. need not be disclosed. Members are asked to inform the Secretariat of any change in their personal interests at the time the change occurs. Members will also be invited to complete an annual declaration of interests form. Where members are uncertain as to whether an interest should be declared they should seek guidance from the Secretariat. If members have interests that are not specified in Appendix II, but which they believe could be regarded as influencing their advice, they should declare them. However, neither the members nor the Secretariat are under any obligation to seek out links of which they might *reasonably* not be aware. For example not being aware of all the interests of family members or not being aware of links between one company and another. Failure to declare interests could lead to dismissal from the committee.

Declaration of interests and participation at meetings

15. Committee members are required to declare any direct commercial interests, or those of close family members, in matters under discussion at each meeting. Having fully explained the nature of their interests, the Chair may, having consulted with other members present, decide whether and to what extent the member should participate in the discussion and determination of the issue. If it is decided that the member should leave the meeting, the Chair may first allow them to make a statement on the item under discussion. Where members are uncertain as to whether an interest should be declared they should seek guidance from the Chair.

Personal liability of Committee members

16. Legal proceedings by a third party against individual Committee members of advisory bodies are very exceptional. A Committee member may be personally liable if:

- he or she makes a fraudulent or negligent statement which results in a loss to a third party;

- he or she commits a breach of confidence under common law or a criminal offence under insider dealing legislation, by misusing information gained through their position.

However, the Government has indicated that individual members who have acted honestly and in good faith will not have to meet out of their own personal resources any personal civil liability which is incurred in the execution or purported execution of their Committee functions, save where the person has acted recklessly.

Openness and Confidentiality

17. The Government is committed to increasing the openness and transparency with which advisory committees and other public bodies operate. To further this aim, the agendas of ACAF meetings will be made available to the public and will be publicised by means of news releases. A news release will be issued after each meeting and minutes will also be available to the public. As a general rule, individual papers for information or discussion at meetings will also be available to the public on request. An annual report will also be published, summarising the Committee's activities and advice over the year.

18. However there will be some exceptions to this general principle of openness, for example:

- where individual papers contain commercially sensitive information such as product formulations/specifications, methods of manufacture, company evaluations and safety assessments, the general principle of the common law duty of confidentiality will apply, except in cases where the information was provided under legislation which deals specifically with disclosure and non-disclosure. Papers, which are deemed to be confidential, will be marked "For members' use only by the Secretariat and their contents should not be disclosed outside of the Committee.
- draft papers or reports which are due to be published at a later date but are not yet in the public domain should not be disclosed outside of the Committee.

19. Questions or approaches from the media should normally be directed to either the Chair who will act as official ACAF spokesman or the Food Standards Agency press office. Although members are encouraged to promote the role of the Committee in general terms, if asked for views on subjects that have been or are

being considered by ACAF, members should always give the line agreed by the Committee.

THE SEVEN PRINCIPLES OF PUBLIC LIFE

Selflessness

Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interests.

Leadership

Holders of public office should promote and support these principles by leadership and example.

TYPES OF INTEREST AND THEIR NOTIFICATION

The following is intended as a guide to the kinds of interest that should be declared and indicates how they should be declared.

1. Personal interests - involve the member personally e.g.

<i>Type of interest</i>		<i>Notification</i>
Consultancies:	any consultancy, directorship, position in or work for the industry, or other relevant bodies, which attracts regular or occasional payments in cash or kind.	To be notified to the Secretariat in writing on appointment to the Committee and at the time of any change to these interests. To be confirmed annually on the declaration of interests form.
Fee-paid work:	any work commissioned by industry or other relevant bodies for which the member is paid in cash or kind.	As above.
Shareholdings:	any shareholding or other beneficial interest in shares of industry. This does not include shareholdings through unit trusts.	As above.
Membership affiliation:	or to clubs or organisations with interests relevant to the work of the Committee.	As above.

Definition of “industry”

For the purposes of the Advisory Committee on Animal Feedingstuffs, “industry” means:

- companies, partnerships or individuals who are involved in the production, manufacture, packaging, advertising, supply, sale or use of animal feedingstuffs. This definition includes those involved in the supply of animal feed raw materials and any other substance incorporated or otherwise used in the production of feedingstuffs. It also includes the users of animal feedingstuffs such as farmers;
- trade associations representing companies involved in such products;
- companies, partnerships or individuals who are directly concerned with research, development or marketing of an animal feedingstuff which is being considered by the Committee.

Definition of “other relevant bodies”

Organisations (not included in the definition of “industry”) with interests relevant to the work of the Committee. This could include charitable organisations and lobby groups.

2. Non-personal interests - involves payment which benefits a department for which a member is responsible, but is not received by the member personally e.g.

<i>Type of interest</i>		<i>Notification</i>	
		<i>£1000 or more from a particular company in the previous twelve months</i>	<i>less than £1000 from a particular company in the previous twelve months</i>
Fellowships:	the holding of a fellowship endowed by industry and other relevant bodies.	To be notified to the Secretariat in writing on appointment to the Committee. Any changes over the year should be declared on the annual declaration form and does not need to be notified at the time of change.	Does not need to be notified.
Support by industry and other relevant bodies*:	<ul style="list-style-type: none"> a grant from a company for the running of a unit or department for which the member is responsible. the grant of a fellowship or other payment to sponsor a post or member of staff in the unit for which the member is responsible. the commissioning of research or other work by, or advice from, staff who work in a unit for which the member is responsible. 	As above	As above
Trusteeships**:	any investment in industry held by a charity for which the member is a trustee.	As above	As above

* Members are under no obligation to seek out knowledge of work done for, or on behalf of, industry and other relevant bodies by departments/units for which they are responsible, if they would not normally expect to be informed. Where members are responsible for organisations which receive funds from a very large number of companies in the industry and from other relevant bodies, they can agree with the Secretariat a summary of non-personal interests rather than draw up a detailed portfolio.

** Where a member is a trustee of a charity with investments in the industry, they can agree with the Secretariat a general declaration to cover this interest rather than draw up a detailed portfolio.

