

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

63rd Meeting of ACAF on 26 February 2014

Discussion Paper

Possible revision of the ACAF Review of On-Farm Feeding Practices

Action required

The Committee is asked to:

- **note the contents of this paper; and**
- **consider whether it might be appropriate to revise the guidance on On-Farm Feeding Practices it produced in 2003.**

In addition, the Committee may wish to consider if it requires any further information to help it consider the above points.

**Secretariat
February 2014**

Possible revision of the ACAF Review of On-Farm Feeding Practices

Purpose

1. This paper considers the question of revising the report produced by ACAF in 2003 following its review of on-farm feeding practices.

Background

2. The BSE Inquiry report¹ in October 2000 concluded that the chain of animal feed manufacture, distribution, on-farm mixing and on-farm use was complex, and that the ease with which cross-contamination occurred within it was one of the most concerning issues in the BSE outbreak. The outbreak of Foot and Mouth Disease provided further focus on on-farm feeding and feed issues. Following discussions at its Open Forum held in July 2001, ACAF agreed that a review of on-farm animal feeding practices should be included in its forward work plan as a matter of priority.
3. The Committee undertook to carry out a review of on-farm feeding practices that would:
 - identify current practices, with a view to issuing recommendations on “best practice” for all stakeholders and their advisors involved in supplying, transporting, storing and using feeds;
 - include all aspects of feed sourcing, transport, storage, feeding on-farm, including on-farm mixing, liquid feeding systems, the use of bought-in feed materials (such as co-products from the food industry) and handling home grown feeds; and

¹ BSE inquiry report published October 2000 available from www.bseinquiry.gov.uk

- identify the main hazards and risks arising from the above processes and increase awareness of these amongst the farming community and other stakeholders.
4. The Committee was mindful of the economic implications to farmers of further regulation or controls. It wanted the report of its review to be a tool to help farmers and others identify hazards and to implement controls and corrective action. It was agreed that any recommendations would be based on the need to protect human or animal health.
 5. The report was published in September 2003 (See Annex I). In tandem with the report a poster outlining main points when feeding livestock was also produced. Demand for this poster was immense.

Developments since the publication of the Review

Changes in Departmental responsibilities

6. When the report on on-farm feeding practices was written in 2003, the Royal Pharmaceutical Society of Great Britain was responsible for maintenance of records of on-farm manufacturers of medicated/zootechnical feeds. The Veterinary Medicines Directorate is now responsible for the approval and inspection of manufacturers and distributors of certain specified feed additives (SFAs), premixtures and feed containing these additives, and manufacturers and distributors of premixtures and feedingstuffs containing Veterinary Medicinal Products (collectively referred to as Schedule 5 products²) in Great Britain. The Department of Agriculture and Rural Development (DARD) carries out similar inspections in Northern Ireland. Premises approved and inspected include commercial animal feed mills and on-farm mixers (including fish farmers).

² Veterinary Medicines Regulations 2013

Legislation

7. Since the publication of the Committee's review of on-farm practices the following legislative measures have been introduced.

Feed Hygiene Regulation (183/2005)

8. This legislation requires feed business establishments (including farms) to be approved or registered. Farms must follow certain operating procedures. This includes standards relating to the prevention of contamination and spoilage of feed, ensuring clean equipment for the storage and transport of feed and the maintenance of certain records.
9. The Veterinary Medicines Regulations 2013 apply to manufacturers of medicated premixtures and feedingstuffs the conditions of Regulation 183/2005 which govern the approval of feed business establishments.
10. In addition, farms that mix medicated feedingstuffs, certain feed additives e.g. Specified Feed Additives (coccidiostats and histomonostats), vitamins and trace elements must apply the principles of HACCP (Hazard Analysis and Critical Control Points system). Many of the provisions of Regulation 183/2005 reflect practices recommended by ACAF in its report on on-farm feeding practices.

Marketing and Use of Feed Regulation (767/2009)

11. This sets out labelling declarations for feed, establishes a catalogue of commonly used feed materials and contains a list of prohibited ingredients.

Official Controls on Feed and Food Regulation (882/2004)

12. This lays down the principles to be followed by designated competent authorities in the enforcement of these controls and specifies the action to be taken both to check businesses' compliance with the rules and when breaches are found. The Regulation is enforced in England through the Official Feed and Food Controls (England) Regulations 2009. Separate but parallel legislation applies in Scotland, Wales and Northern Ireland. The Veterinary

Medicines Regulations 2013 enforce Regulation 882/2004 with regard to Schedule 5 products.

Legislation on TSE and BSE

13. Feed measures relating to the control of animal disease, including transmissible spongiform encephalopathies (TSEs) and the use of animal by-products, are the responsibility of the Department for Environment, Food and Rural Affairs (Defra). However, the Agency maintains a close watching brief.

14. A ban on the feeding of almost all processed animal proteins (PAP), with very few specific exceptions, to all farmed livestock has been in force in EU legislation since 2001. This is to prevent the possible contamination of feed for ruminant animals (cattle, sheep and goats) with meat and bone meal which might contain the prion that is thought to have been the vector for BSE. The prohibition was relaxed with effect from June 2013 to permit the feeding of pig and poultry PAP to farmed fish. Feed containing this category of PAP must be manufactured, stored, and transported under very strictly controlled conditions to prevent any possibility of cross-contamination with ruminant feed. Regular sampling and analysis of compound feed for non-ruminants and ruminants other than farmed fish must be carried out to confirm the absence of animal material other than pig or poultry, using a scientifically validated test. The EU Reference Laboratory has validated for this purpose a polymerase chain reaction (PCR) test capable of detecting very low levels of ruminant material in feed as described in Commission Regulation (EU) No 51/2013³. The results must be kept available for inspection by the competent authority for at least five years.

15. Compounders producing complete feed, which contains pig and poultry PAP, for farmed fish do not require specific authorisation from the competent authority so long as they comply with the following conditions:

³ amending Regulation (EC) No 152/2009 as regards the methods of analysis for the determination of constituents of animal origin for the official control of feed

- a) they are registered by the competent authority;
- b) they keep only aquaculture animals;
- c) they produce complete feed for aquaculture use only on the holding on which it is produced; and
- d) the compound feed contains less than 50% total protein.

16. The existing strict controls which exclude all mammalian meat and bone meal from ruminant feed will remain in place. There are no plans to review these controls.

Legislation on Medicated Feeds

17. As mentioned in paragraphs 9 and 12, the Veterinary Medicines Regulations apply the conditions of approval in 183/2005 to feed business establishments manufacturing medicated feeds. They also makes provision to enforce Regulation 882/2004.

Guidance and assurance schemes

18. Farm assurance standards have been refined since 2003 to take into account the legislative requirements of Regulation 183/2005 on feed hygiene and Regulation 767/2009 on the marketing and use of feed. In the egg production sector, Lion Quality Eggs has requirements on feed hygiene and traceability in accordance with relevant legislation. The Red Tractor Assurance standards include feed specific standards which relate back to the legislative requirements, and include some additional requirements (over and above those in the legislation) which enhance traceability.

19. The Red Tractor scheme produced a Code of Practice for On-Farm Feeding a decade ago and this was revised in 2010 to take account of legislative changes. The revisions were made in full consultation with the FSA and

other stakeholders. The document is not restricted to scheme members and is available for free download from the Red Tractor website⁴.

20. Red Tractor Assurance and Lion Quality Eggs require feed to be supplied by recognised feed assurance schemes such as those run by the Agricultural Industries Confederation (AIC). The schemes for feed supply and farming dovetail well together; liaison between Red Tractor and AIC provides consistency of approach.
21. The three feed/ food safety schemes operated by AIC (Feed Materials Assurance Scheme, Trade Assurance Scheme for Combinable Crops and Universal Feed Assurance Scheme) have been reviewed and revised regularly throughout the last decade to take into account new legislative requirements, emerging risks and industry best practice. In addition, AIC has worked with inspection and certification companies operating the schemes to further strengthen auditor competence and improve compliance with the standards. AIC would estimate that in excess of 98% of feed ingredients and compound feeds produced in the UK are now subject to independent inspection and certification under an AIC scheme.
22. AIC has also worked closely with scheme owners and trade associations at an international level to manage safety risks at source, and strengthened links with UK scheme owners such as Red Tractor, Quality Management System and Scottish Quality Crops.
23. Since 2005 the National Association of Agricultural Contractors has run an assurance scheme for mobile feed mixers and processing which ensures that assured mobile mixers comply with legislative requirements for traceability, hygiene and operator competence. For on-farm mixing, the industry produced Code of Practice is available to all on-farm mixers (not just assurance scheme members).

⁴ http://assurance.redtractor.org.uk/resources/000/556/445/Industry_Feed_Code_of_practice_April_2010.pdf

Farming Practices

24. There have been relatively few significant changes in livestock feeding systems since the 2003 review. The impact of labour costs and new developments in technology has resulted in the greater uptake, for example, of robotic milking and complete diet feeding. The latter has resulted in greater use on dairy farms of straight and blended feeds. High labour costs have seen the development of lower cost extensive systems of production in parts of the UK, including extended grazing, out-wintering and the growth of forage crops. New legislation relating to animal welfare (e.g. sow stalls, larger cages for layers) and the ban on antibiotic growth promoters has had a major impact. The latter has led to the development of a number of nutritional strategies providing alternative means of enhancing performance. The use of enzymes in pig and poultry feeds is now common and other natural products aimed at enhancing digestion and feed utilisation are now available. Research continues on finding alternative protein sources to replace the great reliance on imported protein feeds.
25. A significant development since 2003 has been a greater awareness of the impact of livestock production systems on the environment, e.g. introduction of nitrate vulnerable zones, the impact of excess phosphorus excretion on diffuse pollution and reduction of ammonia emissions from intensive livestock production. This has focussed research on the nutrient requirements of livestock and for practical feeding on the dietary supply of protein and phosphorus with no wastage.
26. Since the 2003 review, assurance schemes covering all aspects of food and feed safety, hygiene, animal welfare and environmental protection are now well established and have been widely adopted. The standards defined in these assurance schemes which cover all livestock production systems are aimed at identifying the hazards and minimising risks covered in the ACAF 2003 review.

27. Since the ACAF review, there have been some changes in specific livestock sectors. For all livestock sectors there is increased use of total mixed ration (TMR).
28. For ruminants there has been an increase in the use of feeder wagons, particularly on beef and cattle units using TMR. Yeast based supplements have increased in popularity on dairy units as has the use of robotic feeders and feed mixers.
29. In the poultry sector there has been an increase in independent flock farmers using feed mixing facilities to produce their own home mix rations, although this is still relatively rare compared to other home mixing practices. Most farms undertake their own dry mixing but there are mobile mix services which are used in some cases.
30. In the pig sector there has been a decrease in home mixing activity. The National Pig Association estimate that 30% of farms undertake some form of home mixing activity, which is a decrease from the 50% quoted in the 2003 review. It also estimates that 15-20% are liquid fed units. Dry feeds in meal or pellet form are fed in specialist feeders to piglets after weaning rather than troughs.

Considerations

31. There is much in the 2003 review of on-farm feeding practices that when followed will help farmers address feed safety issues on-farm. However, since the review was undertaken, the legislation has been strengthened and new provisions, particularly those in Regulation 183/2005, now apply to on-farm feeding operations. In addition, farm assurance schemes have been extended and developed to cover feed safety issues.
32. The Committee, may nevertheless wish to consider reviewing the guidance provided in 2003 to ensure that it reflects current farming practices and

technological developments and that it addresses compliance with the legislative requirements. This would be in line with the Committee's terms of reference, viz 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'.

Conclusion

33. The Committee is asked to:

- note the contents of this paper; and
- consider whether it might be appropriate to revise the guidance on On-Farm Feeding Practices it produced in 2003.

34. In addition, the Committee may wish to consider if it requires any further information to help it consider the above points.

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