DRAFT MINUTES OF THE SIXTY THIRD MEETING OF ACAF HELD ON 26 FEBRUARY 2014

Present:

Chairman	Dr Ian Brown
Members	Mr Tim Brigstocke Ms Angela Booth Ms Ann Davison Mr Barrie Fleming Professor Stephen Forsythe Mr Peter Francis Professor Ian Givens Dr Wendy Harwood Mrs Chris McAlinden Dr David Peers Mr Edwin Snow Mrs Stephanie Young
Secretariat	Mr Keith Millar (Secretary) – Food Standards Agency Miss Mandy Jumnoodoo – Food Standards Agency Dr Ray Smith – Food Standards Agency Mrs Stephanie Cossom – Food Standards Agency Mr Raj Pal – Food Standards Agency
Assessors	Mr Will Francis – Food Standards Agency Mrs Hilary Neathey – Food Standards Agency, Wales Ms Martha Martin – Food Standards Agency, Scotland
Officials	Mr Ron Cheesman – Food Standards Agency (part) Ms Claudia Roncancio Pena – European Food Safety Authority – Head of FEEDAP Unit
Speakers:	Dr Christer Hogstrand – vice Chairman of FEEDAP Panel Dr Kathy Lewis – University of Hertfordshire Dr Phil Howell – National Institute of Agricultural Botany Mr Paul Featherstone – Chairman of the United Kingdom Former Foodstuff Processors Association

1. The Chairman welcomed delegates to the 63rd meeting of ACAF and reminded them that there would be an opportunity to ask questions at the end of the meeting.

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

3. The ACAF Chairman said this was the last meeting for Barrie Fleming, who has had to resign from the Committee due to relocation outside of the UK. He thanked Mr Fleming for his commitment and valuable input whilst on the Committee, and passed on the Committee's best wishes for the future.

4. The ACAF Chairman also noted that due to re-structuring within FSA Scotland, Karen Robertson (FSA Scotland Assessor) had been replaced by Martha Martin. Additionally, Tim Franck (FSA Assessor) had retired from the Agency in January 2014; his replacement is Will Francis. The Chairman thanked Mrs Robertson and Mr Franck for their help and asked that the Committee's best wishes' for the future were passed on to them. The Chairman welcomed Ms Martin and Mr Francis.

Agenda Item 1 – Declaration of Members' Interests

5. Members of the Committee were asked to declare any relevant changes to their entries in the Register of Members' Interests, or any specific interest in items on the agenda. Professor Forsythe confirmed that he was to receive honoraria for participating in a 3M think-tank on food and for providing 12 lectures in Hong Kong. Mr Snow said that he had been present during the FVO audit to the UK in January 2014. The ACAF Chairman confirmed that he had been asked to participate on an NHS antimicrobial resistance research panel. Professor Givens said that he had received one new grant from the Medical Research Council on the modification of lipids in dairy products for cardiovascular health. In addition, he had received joint funding from a charity and industry for research into forms of vitamin D in dairy products.

Agenda Item 2 – Draft Minutes of the Sixty second Meeting (MIN/13/03)

6. The minutes were adopted, subject to the following changes:

- paragraph 6, second sentence – to amend the text to read, 'He sits on a number of private sector company boards and on Government committees and was a molecular biologist, having a first class degree in Applied Biology and a PhD.'
- paragraph 12, first sentence – to amend the text to read 'The group was classified as having mild-to-moderate iodine deficiency on the basis of a median urinary iodine concentration of 91.1 μg/L; and an iodine-to-creatinine ratio of 110 μg/g.'.
- paragraph 15, tenth sentence to be rephrased.

7. A Member of the Committee also requested an update from the Veterinary Medicines Directorate on the five, sector specific, engagement fora on antimicrobial resistance held in December 2013.

Agenda Item 3 – the potential of feed additives to improve the environmental impact of European livestock farming (ACAF/14/01)

8. Dr Kathy Lewis (University of Hertfordshire) introduced ACAF paper 14/01 on a European Food Safety Authority (EFSA) - funded literature review to examine whether feed additives could improve the environmental impact of livestock farming. Dr Lewis said that the project was a systematic review undertaken a year ago, which ended in May 2013. The boundaries set included: i) considering evidence published post-1990; ii) excluding companion and zoo animals and marine animals; iii) concentrating on direct beneficial effects and excluding benefits seen via performance improvements; iv) excluding nitrification and urease inhibitors, focusing only on feed supplements; v) excluding any modelling; and vi) considering all document types. Dr Lewis explained that the environmental impacts of livestock are well documented; feed additives can be used to improve digestive processes leading to more effective use of nutrients and reduction of waste, but the beneficial use in minimising environmental impacts is not generally promoted.

9. Dr Lewis went on to explain the approaches adopted during the review and the key findings identified for cattle, sheep, pigs and poultry. She said that far more data had been identified than was anticipated by EFSA and that the review found limitations with the data, but they pointed to the use of feed additives as being a useful tool in reducing environmental impact of livestock farming, particularly for methane and ammonia. Because of the variability of data, a single study was not a good measure of the effect of a feed additive on emissions. Whilst experimental and measurement or analytical techniques were well established, Dr Lewis suggested more consistency in experimental conditions between studies was needed to allow firm conclusions to be made from the body of scientific literature. They found no sound evidence that equivalent *in vitro* and *in vivo* studies gave the same results. *In vitro* methodology is preferred due to time, costs and animal welfare issues, although scientific opinion was divided on comparability, as many researchers used *in vitro* approaches to confirm *in vivo* findings. There was no sound evidence that cattle and sheep respond to feed additives in the same way where the additives are used for environmental improvement and that more detailed work was needed.

Discussion

10. Following a question from a Member of the Committee on the possible effects on consumer safety on the use of additives for this purpose Dr Lewis said that the study

was looking at additives that were already authorised and thus there should not be any consumer safety issues. In response to a question regarding the source of the data from another Member of the Committee, Dr Lewis confirmed that, in terms of the percentage of data examined from Europe compared to that from the rest of the world, there was a 50:50 split. The University had contacted organisations such as the Agricultural Industries Confederation (AIC) and other relevant bodies to source data. It had also placed a call for information on its website and was contacted by manufacturers, other researchers and producers, which resulted in data being submitted, some of which was promotional literature, or duplicated information already received.

11. Dr Lewis acknowledged that the approach used to measure ammonia and methane production during *in vivo* studies was made via direct measurement. One Member of the Committee commented that to take account of productivity, there was a need to know the environmental impact per unit of food production. Following a question regarding consideration of GM feed in the study from another Member of the Committee, Dr Lewis said that the review had not considered GM issues. Ms Roncancio Pena, Head of the FEEDAP Unit, said that the study was commissioned in order to gain a better insight of the products and that the FEEDAP panel was considering the report with a view on deciding if it needs to provide guidance for the use of additives to improve the environmental impact.

12. The ACAF Secretary said that the work should be drawn to the attention of the UK Environment Agency.

Action: Secretariat

Agenda Item 4 – EFSA's FEEDAP Panel: Consumer exposure (ACAF/14/02)

13. Professor Christer Hogstrand introduced ACAF paper 14/02. He explained that FEEDAP's[1] mandate was to assess the safety of feed additives for the target species, the user/worker, the consumer of products of animal origin and the environment. In addition, the Panel assesses the efficacy of feed additives. The legal basis for much of the work of the Panel fell under EC Regulation 1831/2003, EC Regulation 429/2008 and EC Regulation 178/2002. Professor Hogstrand explained that under Regulation 1831/2003 applications are submitted to the Commission and EFSA. The latter performs the assessment of safety and efficacy that advises the European Commission that will decide together with the Member States on the authorisation of the product.

[1] The Panel on Additives and Products or Substances used in Animal Feed (FEEDAP)

14. The Panel is independent, and is chaired by Kristen Serjsen (Denmark) with two vice chairmen: Guido Rychen (France) and Christer Hogstrand (Sweden). Panel Members are appointed for a three year term with a maximum of three mandates. During 2013 most Panel Members were replaced due to the expiry of their mandates.

15. Following specific authorisation procedures, the European Commission asks EFSA to provide scientific advice and evaluate the safety and/or efficacy of a given substance in relation to its authorisation for use in the European Union. Professor Hogstrand confirmed that in this the Panel has a particularly heavy workload.

16. Panel members meet regularly in plenary session to discuss the work in progress and adopt a final draft of the scientific opinions. Each opinion adopted is the result of a collective decision-making process. This includes consideration of hazard identification, hazard characterisation, exposure assessment and risk characterisation. Professor Hogstrand said that the Panel aims to assess the safety of the use of the additives related to consumer exposure to food products derived from animals given feed or water containing or treated with an additive and containing residues of the additive or its metabolites. The Panel considers toxicological studies (sometimes deriving proposed allowable daily intake values) and also considers metabolic studies. Professor Hogstrand went on to explain that the Panel provides advice on consumer safety from the toxicity data provided by the applicant, and on estimates of consumer exposure derived from the EFSA comprehensive European Food consumption database.

Discussion

17. One Member of the Committee asked if there were any consumer representatives on EFSA panels. Ms Roncancio Pena Head of EFSA's FEEDAP Unit confirmed that there was a consumer representative on EFSA's management board. However, at present there are none on the scientific panels.

18. Dr Hogstrand, said in response to a question from a Member of the Committee, that there were a number of scientific panels in EFSA, all with different remits. EFSA's Scientific Committee has the task of supporting the work of the Panels on cross-cutting issues and scientific matters of a horizontal nature. The Scientific Committee consists of the chairs of the EFSA panels and six independent experts.

19. A member of the Committee asked about suggested minimum levels of trace elements in feed, in particular reference to iodine. Professor Hogstrand replied that FEEDAP's remit was to focus on maximum levels for consumer safety rather than setting minimum levels for consumer nutritional purposes. The Member responded that any reduction in the maximum limit for iodine-based additives for dairy cattle would be expected to lead to lower levels of iodine in milk. This may further reduce the iodine status of the UK population.

20. Following a question from another Member of the Committee, Ms Roncancio Pena explained that EFSA receives requests for opinions mainly from the European Commission and occasionally from the European Parliament. Member States can also request opinions. The request outlines what is being asked of EFSA: the issue, the terms of reference, the timeframe, etc. Upon receipt of a request, EFSA considers its contents, discusses it with the Commission and addresses any issues that need clarifying, such as the feasibility of the deadline. A request normally results in the delivery of an opinion by one of EFSA's Scientific Panels or its Scientific Committee.

Agenda Item 5 – Pre-breeding and wheat re-synthesis (ACAF/14/03)

21. Dr Phil Howell (National Institute of Agricultural Botany (NIAB)) introduced ACAF paper 14/03 on work to create new wheat varieties via the hybridisation between an ancient wheat and wild grass species. The result is a 're-synthesised' wheat which, when crossed with modern UK varieties, may provide yield improvement, drought tolerance, disease resistance and resource-use efficiency.

22. Dr Howell said that pre-breeding was primarily the moving of new genes and traits into adapted backgrounds. The aim of the research was not to directly breed new varieties, but to produce adapted lines that commercial breeders could incorporate into their programmes. There are a number of initiatives around the world that are looking at pre-breeding and re-synthesis. The work at NIAB is part of a group of universities working together in the Wheat Improvement Strategic Programme (WISP). Work is also being carried out elsewhere.

23. Dr Howell explained that two wild grasses cross bred to form a stable hybrid known as Wild Emmer 100,000 years ago (which is still found in the Middle East). Then 10,000 years ago, a second stable hybrid was formed when wild emmer and wild goat grass cross bred. This second hybrid is the genetic basis of modern wheat – a hexaploid plant (containing six highly related sets of chromosomes). Dr Howell then described how NIAB was looking to recreate the second hybridisation event to produce a stable hybrid, re-synthesised wheat, using durum wheat cross-bred with wild goat grass. Ultimately, the aim was to bring more diversity into modern wheat by cross-breeding the synthesised wheat with the standard UK wheat varieties Robigus and Paragon. A similar breeding programme was also underway based on crosses between the same wheat varieties and Wild Emmer and Cultivated Emmer.

24. The results seen by NIAB have shown high yield potential in re-synthesised wheat derived selections - with some demonstrating yields of up to 30% over parent varieties. However, there is room for improvement. When grown using

conventional fertiliser the re-synthesised lines produce good yields and the yield of these re-synthesised lines drops off more slowly when nitrate input is reduced. NIAB has also seen an increase in yield components, such as very large grains and an increased grain number.

25. Dr Howell noted that there has been relatively little quality testing of the grain so far. Samples from the 2011-12 trials showed "normal" ranges in predictive quality tests. Samples from 2012-13 trials are currently passing through the labs and the best candidates from this will go on to milling and baking tests. Dr Howell stated that there were currently no plans for specific animal feeding studies due to costs and availability of grains. However, the re-synthesised wheat does appear quite palatable to wild animals.

26. Dr Howell discussed the optimal ideotype (traits) of the wheat for feed purposes, noting that most available feeding studies related to non- ruminants such as pigs and poultry. Scientific literature on this area was sparse, but a few traits had been highlighted. Soft wheat was preferable for energy conversion in non-ruminants, and also reduces the viscosity of feed as it passes through the gut. Secalins cause stickiness problems and wheat flour contains non-starch polysaccharides, which causes gumming problems. These problems can be overcome with the use of enzymes, but wheat inhibits these enzymes. Gluten is useful for baking, gluten 'dough balls' can cause blockages in animal intestines. The conclusion was the desired 'feed' wheat ideotype should be secalin (rye) negative, soft, low in non-starch polysaccharides, low in xylanase inhibitor proteins, low in protein, and weak in gluten. Dr Howell concluded that NIAB were able to identify re-synthesised varieties that offer improvements in these traits. However, these varieties require testing via feeding trials.

27. Dr Howell said that the first re-synthesis was reported in 1946 in USA. The International Maize and Wheat Improvement Centre (CIMMYT) began work in this area in the late 1980s, and other work is also underway in China and Australia. CIMMYT looks at wheat breeding for low input agricultural systems, which release new lines for farmers to use. A third of their new lines have some re-synthesised wheat in their pedigree, and there are reports that up to a quarter of the farmed acreage in China is planted with re-synthesised wheat. In the UK, 40 varieties have been placed on the 2014-15 Recommended List for commercial use by farmers (31 of these are non-bread making varieties that are used in animal feed). Many of these 'feed' varieties have Wild Emmer in their pedigree, with no concerns regarding suitability. NIAB's work is the first time re-synthesised wheat has been systematically tested in Northern Europe.

Discussion

28. In response to a question raised by the ACAF Chairman regarding how this work related to genetic modification (GM), Dr Howell said that the definition of GM varied according to opinion, but this was not considered genetic modification by its traditional definition. A Member of the Committee added that this was a very exciting area that used conventional breeding techniques, and confirmed it was not GM. The same Member asked if the work had produced lines that could be harmful as an animal feed. Dr Howell said that this had not yet been investigated but that testing would be undertaken before commercialisation of any variety. Dr Howell noted that it was difficult to find a desired ideotype of wheat for animal feed, as the animal feed formulations are based on low cost formulation using the relative cost of each nutrient rather than desired traits. Price per unit of nutrient drives how much wheat is typically used in animal feed, so demand is not consistent. One Member of the Committee commented on low cost feed formulations. Dr Howell said that this was why it was essential for plant breeders and the animal feed industry to meet. Another Member of the Committee asked if these varieties should be regulated as novel foods. Dr Howell said that the work was not to create novel foods. Forty varieties are currently recommended and available on farm, thirty-one of these are non-bread making types are used in animal feed, but there are currently no varieties designed solely for use in animal feed.

29. A Member of the Committee said that a lot of wheat was used in the UK because of its availability, but that there were large differences in wheat composition which can make a significant impact in feed composition. Consistency in feed material composition will produce huge benefits for the feed industry. Dr Howell said the issue here is to try and stabilise wheat composition. The ACAF Secretary asked Dr Howell to keep the Committee and the Agency's Animal Feed and Animal By-Products Branch updated on developments.

Action: Secretariat

Agenda Item 6 – Possible revision of the ACAF Review of On-Farm Feeding Practices (ACAF/14/04)

30. As part of its annual exercise to review its Forward Work Plan, a Member of the Committee had previously suggested that the Committee should consider reviewing, and possibly revising, its Report on On-Farm Feeding Practices. Miss Jumnoodoo said that the BSE Inquiry report in October 2000 concluded that the chain of animal feed manufacture, distribution, on-farm mixing and on-farm use was complex. One of the most concerning issues was the ease with which cross-contamination occurred within the food chain. Additionally, the outbreak of Foot and Mouth Disease provided further focus on on-farm feeding and feed issues.

31. 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.

32. The Committee's review of on-farm feeding practices included:

- identifying 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;
- 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
- identifying the main hazards and risks arising from the above processes and increasing awareness of these amongst the farming community and other stakeholders.

33. The Committee's report was published in September 2003. Miss Jumnoodoo explained that since 2003 there have been a number of developments including changes in responsibilities; for example in Great Britain the Veterinary Medicines Directorate rather than the Royal Pharmaceutical Society of Great Britain is now responsible for the approval and inspection of manufacturers and distributors of certain specified feed additives, premixtures, and feedingstuffs containing veterinary medicinal products. The Department of Agriculture and Rural Development carries out similar inspections in Northern Ireland.

34. There have been changes to legislation in particular the introduction of EU Regulation 183/2005 on feed hygiene. This requires most feed businesses involved in making, marketing or using feed to be registered or approved. The Regulation includes standards relating to preventing contamination and spoilage of feed, ensuring clean equipment for the storage and transport of feed and the maintenance of certain records. Many of the provisions of Regulation 183/2005 reflect practices recommended by ACAF in its report. Additionally, new legislation (Regulation 767/2009) exists concerning labelling declarations for feed, on the placing on the market and the use of feed.

35. Miss Jumnoodoo stated that ACAF Paper 14/04 also covers the legislation on TSE and BSE which are the responsibility of Defra as is the legislation on medicated feeds.

36. Miss Jumnoodoo also said that 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. Schemes

such as Red Tractor Assurance, and schemes run by the Agricultural Industries Confederation (e.g. FEMAS or UFAS) have been reviewed and revised regularly to take account of new legislative requirements, emerging risks and industry best practice.

37. Finally, changes in technology and labour costs have contributed to greater uptake, for example, of robotic milking and complete diet feeding and awareness of the impact on the environment.

Discussion

38. Members agreed that the Committee should review and update the report. It is an important document that should provide consistent guidance and reflect current trends which are currently not included.

39. The following Members agreed to form a sub group that would consider revision of the document: Ms Booth, Mr Brigstocke, Mrs Young, Dr Peers and Mr Snow. It was also agreed that the Agency's Animal Feed and Animal By-products Branch and the ACAF Secretariat will support the sub-group as required. Additionally, the ACAF Secretariat will update the Committee's forward work plan to include this piece of work as a medium priority.

Action: Secretariat

Agenda Item 7 – UK Former Foodstuff Processors Association (UKFFPA) (ACAF/14/05)

40. Mr Paul Featherstone the newly-elected Chairman of the United Kingdom Former Foodstuff Processors Association (UKFFPA) explained that in response to the European Commission's roadmap to a resource-efficient Europe which identified food as a key sector where resource efficiency should be improved, the European Feed Manufacturers' Federation (FEFAC) had initiated the establishment of the European Former Foodstuffs Processors Association (EFFPA). This association represents more than 60 active companies in eight Member States.

41. Mr Featherstone thanked the Agricultural Industries Confederation (AIC) and the FSA's Animal Feed and Animal By-products Branch which in support of the action being taken at EU level, proposed the setting up of an affiliated association to represent the companies which process former foodstuffs for use in animal feed in the UK. He explained that the AIC provide the secretariat for the UK association and, FEFAC is secretariat for EFFPA. The inaugural meeting of the UKFFPA had been held on 13 December 2013. Twelve companies had joined the UK association some of whom were already members or associate members of AIC. This represents the majority of the tonnage of former foodstuffs processed into feed in the UK which

totals more than 650,000 tonnes a year. Ninety-five percent of the material collected comes directly from the food industry.

42. Mr Featherstone confirmed that former foodstuffs are covered by a comprehensive legal framework including for example, Regulations 999/2001[2], 178/2002[3], 183/2005[4], 767/2009[5] and 1069/2009[6] and European Commission Directive 2002/32[7]. Assurance schemes run by the AIC also place conditions on the use of former foodstuffs in the manufacture of animal feed. Mr Featherstone said that new pressures for the sector include: a) the EU food waste strategy which aims for a reduction in food sent to landfill of 50% by 2020; b) tolerance for packaging residues (a number of Member States have declared a *de facto* tolerance); and c) clarity, particularly at an EU level, on a legal definition of former foodstuffs, i.e. these are not waste.

43. The aim of both the UK and European associations is to speak with one voice and lobby in one place various organisations such as relevant government departments, trade bodies and industry. Mr Featherstone referred to UKFFPA's terms of reference adding that former foodstuffs that Members process are technically unsuitable for human consumption therefore they are not in direct competition with food for human consumption.

Discussion

44. The ACAF Chairman said the initiative was a positive move. Following a question from the ACAF Chairman, Mr Featherstone said that only products that were deemed to be safe were used to make animal feed. Additionally, following a comment from a Member of the Committee, the use of ruminant gelatine was prohibited. The ACAF Secretary thanked Mr Featherstone for his presentation and said that 'waste' should not be used to describe 'former foodstuffs'. He added that although in 2011 the FVO had given a recommendation for the UK to apply the zero tolerance in legislation on packaging residues in animal feed, the UK had since introduced a 0.15% *de facto* tolerance; the FVO had indicated during its recent audit in January 2014 that the original recommendation may be removed. However, this has yet to be confirmed.

[2] laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies

[3] laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety

[4] laying down requirements for feed hygiene

[5] on the placing on the market and use of feed, amending European Parliament and Council Regulation (EC) No 1831/2003 and repealing Council Directive 79/373/EEC, Commission Directive 80/511/EEC, Council Directives 82/471/EEC, 83/228/EEC, 93/74/EEC, 93/113/EC and 96/25/EC and Commission Decision 2004/217/EC

[6] laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation)

[7] on undesirable substances in animal feed

45. The ACAF Secretary noted that the products used by former foodstuff processors, might still be fit for human consumption but may not be acceptable for this purpose, e.g. broken biscuits, labelling issues due to printing problems. A Member of the Committee acknowledged the issue of the terminology of 'waste' citing it was difficult to align consumer perception and current practices.

Agenda Item 8 – Food and Veterinary Office (FVO): Audit to Great Britain January 2014

46. Mr Ron Cheesman of the Agency's Feed Review Implementation Team provided an oral update on the FVO audit of UK feed law enforcement that took place in January 2014. He said that the audit focused on risk management along the feed chain and dioxins monitoring (in advance of a review by the European Commission on Regulation 225/2012[8]). This audit was similar to others being carried out across all Member States during the last two years. Mr Cheesman explained that before the audit, Agency officials had met with the FVO to discuss the considerable amount of work carried out by the FSA, in conjunction with local authorities and the National Trading Standards Board (NTSB) to improve the delivery of controls and how this could be best factored into the audit. Mr Cheesman went on to explain that the auditors had visited 3 of the 4 regions in England where new arrangements are being piloted to support official feed controls; received presentations on the way in which the pilot regions had changed their delivery of controls to better improve consistency and the quality of controls. The audit involved interviews with seven individual local authorities (six in England and one in Scotland) regarding the organisation and delivery of their controls. There were also visits to 21 feed establishments including driers of grain, feed blenders, oleochemical plants, producers of feed additives, feed compounders and processors of surplus food into feed.

47. The Audit comprised two teams, and although at the closing meeting the FVO auditors made a number of observations these were generally favourable.

Discussion

48. Following a question from the ACAF Chairman, Mr Cheesman said that he expected to provide the Committee with the recommendations from the FVO auditors at the next ACAF meeting. The ACAF Secretary added that some of the recommendations are likely to be aimed at industry, and some will be for local authorities. He thanked

[8] amending Annex II to Regulation (EC) No 183/2005 of the European Parliament and of the Council as regards the approval of establishments placing on the market, for feed use, products derived from vegetable oils and blended fats and as regards the specific requirements for production, storage, transport and dioxin testing of oils, fats and products derived thereof

the AIC membership, one of the Committee Members, local authorities and industry for their assistance during the audit.

Action: ACAF Secretariat

Agenda Item 9 - Matters arising from the Minutes of previous meetings

Iodine in Animal Feed (ACAF/13/20)

49. The ACAF Chairman said that, at the Committee's 9 October 2013 meeting, it was suggested it may be beneficial if a joint SACN and ACAF Working Group was established to further explore the issue of iodine in animal feed. Members were informed on 25 November 2013 that the ACAF Secretariat met with a representative of the SACN Secretariat and Public Health England (PHE) on 19 November 2013.

50. With respect to joint working, due to resource issues the SACN Secretariat confirmed that it is unable to set up a joint working group. The meeting also discussed the EFSA proposal to reduce the maximum permitted level of iodine-based feed additives for dairy cattle and poultry in order to prevent consumer over-exposure to iodine. It was agreed that a letter will be prepared by PHE which questions the rationale for the proposal.

51. On 6 December 2013, ACAF Members were sent a copy of the letter which was sent to the Commission on 5 December 2013.

52. On 6 January 2014 EFSA wrote to the European Commission (DG SANCO) indicating that EFSA's Panel on Dietetic Products, Nutrition and Allergies (NDA) is currently drafting an opinion on dietary Reference values of iodine, which is expected to be published in April 2014. Based on the outcome of this opinion, which includes new information available related to the iodine status in the EU population, the iodine opinions adopted by EFSA's FEEDAP Panel in 2013 could be updated accordingly, and delivered to the European Commission by the end of 2014.

Feed Safety – potential gaps – Conclusions (ACAF/13/13)

53. On 10 December 2013, Members were informed that the following ACAF paper – Review of Gaps in the Feed Chain: Summary of Findings and Conclusions - had been uploaded to the ACAF website.

54. The ACAF Chairman on behalf of the Secretariat thanked Members for their help in finalising the paper.

Insects as a potential source of animal feed (ACAF/13/21)

55. At its 9 October 2013 meeting, Members sought an update on the BSE feed ban contained in ACAF paper ACAF/13/25 in relation to insect PAP.

56. The ACAF Chairman noted that the ACAF Secretariat had via the Defra Assessor contacted relevant colleagues in Defra who have provided an update which has been included in ACAF information paper 14/06 on EU Developments.

Agenda Item 10: Any Other Business

57. No items were raised.

Date of the next meeting

58. The ACAF Chairman said that the next meeting would take place between 8 and 9 May 2014 at the McDonald Old England Hotel, Bowness-on-Windermere, Cumbria.

Information Papers

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

- EU Developments (ACAF/14/06);
- Update on the work of other advisory committees (ACAF/14/07);
- Feed Law Enforcement Review Implementation Programme (ACAF/14/08); and
- ACMSF antimicrobial Resistance Working Group Summary of the second meeting of the working group held on 6 December 2013 (ACAF/14/09).

ACAF Secretariat
April 2014

Question and Answer Session

Questions on Agenda item 3 – The potential of feed additives to improve the environmental impact of European livestock farming

Didier Jans (FEFANA)[9] – asked if it was possible to compare data from in vivo studies with in vitro data. Additionally, Mr Jans was uncertain of the purpose of the EFSA study and noted that the use of amino acids (which can contribute to the reduction of the environmental impact) had not been considered. Mr Jans suggested that there was a need to consider all aspects of this issue. The ACAF Secretary noted that the work had been funded by EFSA, but had produced inconclusive findings. Ms Roncancio Pena said that the work was to gain a better knowledge of the current position. Professor Hogstrand added that the idea for the work was to get some structure and background to this area, as this was one particular facet of many as part of a defined study. The Panel had yet to decide on how it would evaluate the safety and efficacy of feed additives for this use.

Mr Jans raised a concern that the study had undertaken a restrictive approach and there was a need for concrete results to advise industry on applications for authorisation for this particular use, as these additives still require authorisation and uncertainty was noted from existing applications. Mr Jans offered FEFANA support to EFSA/FEEDAP to explore end-points and assessment methodologies.

Questions on Agenda item 4 – FEEDAP Presentation

Joe Shavila (Food Standards Agency) asked, with respect to the estimation of total chronic exposure, whether FEEDAP added the 95th percentile exposure for consumers from one food source to average exposure from the rest (as some EFSA panels consider adding 95th percentile exposure from two sources). Professor Hogstrand confirmed that FEEDAP did use one food source.

Professor Margaret Rayman (University of Surrey) commented on FEEDAP's transparency and the problems with the methodology used by the Panel when formulating its opinion on selenium-yeast as a feed ingredient. Both Professor Hogstrand and Ms Roncancio Pena were unable to comment on the specific points raised by Professor Rayman, who agreed to provide Professor Hogstrand and Ms Roncancio Pena with full details following the meeting.

Didier Jans (FEFANA) – requested clarification on the toxicological aspects of the assessment carried out by FEEDAP. Ms Roncancio Pena replied that part of

[9] FEFANA (EU Association of Specialty Feed Ingredients and their Mixtures)

the assessment mainly dealt with upper levels, and in some instances the deficiencies. She noted that the Panel only has six months to consider the application and provide an opinion, and therefore tried to be effective within the available time. Mr Jans asked whether, in the interest of having as reliable a risk assessment as possible, if it would be possible to ask the European Commission to extend the time constraints, if required. As far as industry/applicants are concerned, it can be anticipated that they would support a reasonable extension when needed if this could avoid potential omissions of important aspects of the risk assessment. Professor Hogstrand replied that the Panel considered the safety to target species, users and environment, and the safety to consumer. Specialists in all these areas were required, but their availability was limited.

Lana Oliver (Pet Food Manufacturers Association) – noted in the presentation, under safety of the consumer, that Dr Hogstrand highlighted that the FEEDAP panel consider metabolic studies on target species and also laboratory animals.

From a pet food perspective, Ms Oliver asked why in the EFSA Guidance on the requirements for applications for pet food additives is there a requirement for testing on cats and dogs (when target species) instead of using data from lab animals. It seems the FEEDAP panel consider it appropriate to extrapolate from lab animal data when assessing consumer safety yet not for cats and dogs when they are not entering into the food chain. Ms Roncancio Pena said EFSA were able to extrapolate laboratory data; however, they also required data on cats and dogs in order to confirm target animal safety. She noted that cats have a very peculiar metabolism, and so it may not always be possible to extrapolate.

Dave Parker (Food Standards Agency) – noted the gaps for some commodities for toddlers on the slide dealing with chronic consumption, and asked how the safety of toddlers was considered. Professor Hogstrand said that some commodities (e.g. liver, kidney, fat, honey, seafood) are not considered to be eaten in sufficient amounts by toddlers so they were not considered for chronic consumption. In follow-up, Dr Parker asked how acute consumption was handled for toddlers, who may eat those things occasionally. Professor Hogstrand replied that FEEDAP had another model for acute exposure.

Questions on Agenda item 8 – FVO Audit

Didier Jans (FEFANA) – acknowledged the outcome of the FVO audit. He remarked that following the 2014 audit of the FVO, the FSA had started to look more closely at possible synergy with the feed industry's assurance schemes, and asked about the outcome of this reflection. He asked if the FSA's Inspection template, that is used by local authorities when performing inspections of feed businesses, could be made available to feed trade associations and those that

manage the assurance schemes. The ACAF Secretary replied that considerable time was spent discussing assurance schemes and earned recognition. DG SANCO seemed interested in this initiative. Assurance schemes are subject to third party audit and should demonstrate a responsible operator. Earned recognition is also linked to track record. Official/inspection footfall on premises therefore generally reduces. In the current economic climate local authorities are being stretched and need to prioritise their workloads. Mr Jans replied that in third countries earned recognition of feed schemes is increasingly valued by control authorities and that any visible support that the Commission and/or national competent authorities can give to feed schemes is extremely valuable for their work in establishing an international fair playing field.