

**ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS**

**MINUTES OF THE SECOND MEETING OF ACAF:  
1 DECEMBER 1999**

**Present:**

Chairman	Professor Phillip Thomas
Members	Dr Ian Brown
	Mr John Cheetham
	Dr Andrew Chesson
	Mrs Gilli Davies
	Mr Paul Foxcroft
	Dr John Heritage
	Mrs Fiona Hodgson
	Mr Robert Moore
	Mr Andrew Peddie
	Dr Helen Raine
	Dr Desmond Rice
	Dr Michael Stringer

Secretariat	Mr Bill Knock
	Mrs Karen Dell
	Ms Louisa Roddis
	Mr Louis Loizou

Assessors	Mr Derek Renshaw – JFSSG (DH)
	Mr Jim Symington- SERAD
	Professor Cecil McMurray - DANI

JFSSG/MAFF Officials	Dr Ray Smith
	Mr Tony Flower

1. The Chairman welcomed members to the meeting and conveyed apologies for the absence of two assessors, Dr Burt and Mr Vadgama.

**AGENDA ITEM 1 – MINUTES OF PREVIOUS MEETING**

2. Members indicated that they were generally content with the format and style of the minutes but a few small amendments were suggested as follows:  
para.4 – “of” and “to” missing from the second line  
para.8 – “to” missing from the penultimate line  
para. 9 – the words “is this food” in line three to be replaced by “this food is”.

*Action: The Secretariat to amend the minutes as agreed.*

3. The Committee did not think that paragraph 9 properly reflected concerns raised at the previous meeting about the framework for independent assessment of third country (non-EU countries) feeding practices. It was agreed that the Secretariat would prepare a paper on roles and responsibilities for the assessment of third country feeding practices.

*Action: The Secretariat to prepare this paper.*

## **AGENDA ITEM 2- MATTERS ARISING**

4. Future topics for ACAF to consider (ACAF/99/11) - It was agreed that the topic “Education of the Public regarding animal feed issues” should be re-classified as a priority subject. Otherwise members were content with the revised list of topics presented in the paper.
5. Advisory committees which could have an impact on the work of ACAF (ACAF/99/12) – Members were content with the details provided in this paper on the Working Group on Pesticide Residues and the Advisory Group on Veterinary Residues.
6. The Committee requested the Secretariat to ensure that technical terms used in papers were fully explained.

*Action: The Secretariat.*

7. ACAF Briefing/Training Session – It was agreed that the briefing session for ACAF members on 24 November, providing background information on MAFF, the Food Standards Agency (FSA), the animal feed and animal by-products industries and animal feed from the farmers’ perspective, was very useful. Members were asked if they would like copies of the publication “Feed Facts Quarterly” which provides useful statistics on animal feed. It was suggested that much of the data in the publication probably originated from MAFF and it was agreed that the Secretariat should look into obtaining this information internally.

*Action: The Secretariat to look into the possibility of compiling statistics on animal feed from internal MAFF sources.*

8. Photographs - Members agreed to the use of individual photographs taken at the last meeting for publicity purposes.
9. FSA - Mr Knock updated members on progress towards the establishment of the Food Standards Agency, indicating that the Food Standards Act was now published and asking members if they would like a copy. He explained that the Chairman of the FSA, Professor Sir John Krebs, had just been appointed and the other Board members and the Chief Executive would probably be announced shortly. Plans to set up the Northern Ireland Food Standards Agency were also well advanced. The Committee was informed that proposals were expected shortly on the establishment of a European Food Standards Agency. There were no further details available at the time of the meeting but it was agreed that members would receive a copy of what was being proposed as soon as available.

*Action: Members to inform the Secretariat if they want a copy of the Food Standards Act and the Secretariat to provide members with copies of the European Food Standards Agency proposals when available.*

### **AGENDA ITEM 3 – HOMEOPATHIC ADDITIVES (ACAF/99/13)**

10. This paper described the respective responsibilities of ACAF and the Veterinary Products Committee where homeopathic additives and herbs were used in animal feed. The Committee was informed that ACAF could consider herbs and herbal additives which did not make claims about preventing or curing disease in animals or affecting physiological function.
11. During discussion the distinction between herbal and homeopathic additives was highlighted and concern was expressed over the grey area of “off label” claims (i.e. where therapeutic claims do not appear on the label but may be promoted by the salesperson or by other means). It was pointed out that the expense involved in the official approval for veterinary medicinal products could encourage the practice of making “off label” claims. Such products would not automatically come to the Committee’s attention but it was agreed that members could flag up any products they encountered that caused concern. It was also agreed that the Secretariat should produce a paper giving three or four case histories so that the Committee could better understand the approval process and consider the sort of claims made.

*Action: The Secretariat to produce a paper indicating examples of herbs and homeopathic additives used in animal feed.*

12. Some concern was also voiced that the definition of feed additives which would shortly be in place under Directive 96/51/EC was too wide ranging and would cover all herbal additives.

#### **AGENDA ITEM 4 – ANIMAL FEED LABELLING (ACAF/99/17)**

13. The Committee was informed of current labelling requirements and was updated on recent EC developments on ingredient listing. Their attention was drawn to the fact that there are no separate requirements for labelling animal feed derived from Genetically Modified Organisms (GMOs).
14. The Committee agreed the proposed UK line with regard to ingredients of compound feeds for farm livestock, i.e. to support full ingredient listing rather than listing by category but to oppose compulsory percentage declarations. It was thought that a very large part of the feed industry was already listing all ingredients in descending order by weight and that this proposal would be achievable in practice. It was noted that regular adjustments in the percentage composition of compound feeds was important to allow for natural variations in raw material composition and permit the manufacture of feeds of specified energy and protein content. Furthermore, it was possible that declaring the exact percentages would inhibit product research and innovations in feed design. It was pointed out that there was no demand from farmers to know the percentages used.
15. There followed a discussion on the labelling of animal feed containing GM material. The need to define the labelling terms such as “GM free”, “GM” and “non-GM” was thought to be the first step. It was agreed that negative labelling (i.e. non-GM and GM free) may be more practical than positive labelling (i.e. contains GM) as it was impossible to guarantee that crops did not contain some GM unless they came from identity preserved sources, some members argued that even then the presence of GM material might be identifiable. It was thought that there would have to be a de-minimis level for any negative labelling claim. However, it was suggested that perhaps the most that could be claimed was that the feed was made from crops from identity preserved sources that had been bred by traditional methods from plants that were not originally genetically-modified. It was certainly difficult to define “GM” as the technology was developing rapidly. However, it was accepted that negative labelling would be a different approach to that used to label human food, where positive labelling was required.
16. Concerns were raised that negative labelling would create non-GM products as a specialist market along with organic products and this might increase their price. Other members were concerned that use of negative labelling might be taken to imply that non-GM products were better than

GM products when this was not necessarily the case. It was agreed that safety was not an issue but that GM labelling was an important factor in allowing consumers to exercise choice. The problem of enforcing any GM labelling requirements was also raised as it is difficult to test for GM material.

17. Identity preservation was raised as a potentially important issue. It was suggested that there may be more genetic modification of plants for industrial use in the future with the by-products being fed to animals. It was agreed that the Secretariat would prepare a consultation document for interested parties on animal feed labelling, including full ingredient listing, percentage declarations and wider issues such as GM labelling and the labelling of additives. The scope of the consultation would not include pet food. The issues of pet food labelling, which it was accepted might be different from those considered for farm livestock, would be noted for future consideration by the Committee.

*Action: The Secretariat to produce and issue a consultation document seeking views on animal feed labelling.*

#### **AGENDA ITEM 5 – ASSESSING THE SAFETY, QUALITY AND EFFICACY OF NEW FEED ADDITIVES AND BIOPROTEINS (ACAF/99/16)**

18. The system for assessing new feed additives and feed bioproteins was explained to the Committee. It was informed that the assessment of the safety, efficacy and quality of a potential new additive or bio-protein was linked to a dossier system and that guidelines for the assessment of additives and bioproteins and on the format and content of the dossiers were contained in Council Directives 87/153 and 83/228 respectively.
19. The Committee agreed to continue the existing UK arrangements for assessing dossiers i.e. that assessments will continue to be made by the Joint Food Standards and Safety Group (JFSSG) with the technical assistance of the Health and Safety Executive, the Veterinary Laboratories Agency and other advisers. The Committee asked that it be kept fully informed of the progress of these dossiers via regular written reports so that it could raise and discuss general issues arising from the process.

*Action: The Secretariat to prepare regular written reports on the progress of feed additive and bioprotein dossiers.*

#### **AGENDA ITEM 6 – DIOXINS IN BELGIAN FEED FATS (ACAF/99/18)**

20. The Committee was informed that there had been no further developments on the two EC proposals outlined at the last meeting - namely to ban

Recovered Vegetable Oils (RVOs) and set limits on dioxin levels, although revised proposals were expected from the European Commission shortly. The Committee confirmed its support of the use of RVOs in animal feed where their traceability could be safeguarded. It was considered important that controls be established over the origins/sources of RVOs as this was where contamination could arise. The Committee was informed that officials were involved in talks with the Feed Fats Association, the RVO processors and UKASTA which represented feed compounders, to finalise an assurance scheme. The Committee asked to be kept informed of the progress of these talks.

*Action: The Secretariat to keep the Committee informed of progress towards better controls over the sources of RVOs.*

21. The Committee was informed that in its consideration of dioxins, the Standing Committee on Animal Feedingstuffs voted in October to set a maximum level of 0.5 ng WHO-TEQ/kg for kaolitic clays with effect from 1 November and on all other binders and anti-caking agents from March 2000, pending a scientific risk assessment. The UK did not agree with this proposal on the grounds that no attempt had been made at even a rudimentary analysis of risk, and abstained from the vote. With regard to the proposed further maximum levels for dioxins, the Committee was informed that these would be temporary and that the UK would be pressing for a full risk assessment before any permanent measures were agreed, especially where fish-based ingredients were concerned.
22. In order to develop a better understanding of risk analysis the Committee agreed that at its next meeting it wanted to consider a paper on the principles and practice of risk analysis, which would use dioxins to illustrate the issues.

*Action: The Secretariat to provide a paper on risk analysis for the next meeting.*

#### **AGENDA ITEM 7 – SEWAGE SLUDGE IN FRENCH ANIMAL FEED (ACAF/99/19)**

23. This paper explained the background to allegations that sewage sludge had been incorporated in animal feed in France and the advice provided by JFSSG, in part based on input from the Chairman as well as the chairmen of the Committee for Toxicity and the Advisory Committee on the Microbiological Safety of Food. The Chairman outlined the difficulty in reacting to a very rapidly developing situation where there was considerable media attention. It was agreed that in any future such scenario, the Secretariat should ensure that members were fully and quickly briefed on the problem that had arisen and the line of response

being adopted. This would allow individual Committee members to respond to enquiries if necessary. The Committee's agreement was sought on the UK line supporting action taken by the Commission to clarify the prohibition on sewage sludge in Decision 91/516/EC.

24. It was considered important to clarify what was meant by 'waste water' although it was acknowledged that this was difficult. The Committee did not want safe and sensible practices of recovering certain materials from food processing to be prohibited. These practices include trapping solids from water used in vegetable processing, from brewing and distilling and from fish processing. It was pointed out that such practices help to reduce environmental problems. However it was considered important that prohibited faecal material should not find their way into animal feed. The committee asked that it be copied in on any formal Commission proposals on sewage sludge.

*Action: The Secretariat to provide ACAF members with information on any formal Commission proposal on sewage sludge.*

## **ANY OTHER BUSINESS**

25. The Secretariat was asked to provide an information paper for a future ACAF meeting on zootechnical additives covering legislation, labelling and enforcement.

*Action: The Secretariat to provide an information paper on zootechnical additives.*

26. Joint Meeting of ACAF and the Advisory Committee on Novel Foods and Processes (ACNFP) on Approaches to Assessing the Safety of GM Material for use in Human Food or Animal Feed - Members discussed the joint meeting which would be held in the afternoon between ACAF and the ACNFP. The Committee envisaged occasions when both committees would have an interest in a particular GMO application. Where the overlap was significant a joint meeting should be considered. It was thought that the work of the two committees should be complementary rather than identical. It was agreed that dossiers relating to GM applications coming before ACAF should be considered by Professor Thomas, Dr Heritage, Dr Chesson and perhaps other members in the first instance with outside experts' views being sought as necessary. It was thought to be important to ensure that the principles of openness and accountability were not compromised by the use of outside experts. The Committee asked that it be kept informed of the progress of GM dossiers as considered by the smaller group.

*Action: The Secretariat to look at the position regarding co-opting outside experts and to prepare regular written reports on the progress of GM dossiers.*



## **DATES OF FUTURE MEETINGS**

27. It was agreed that the third meeting of ACAF (an out of town meeting) should take place in week commencing 28 February. The fourth meeting will take place on 4 May and the fifth meeting will be on 27 June.

## **PAPERS FOR INFORMATION**

28. The following papers were presented for information:

- **Organic Farming and Animal Feed (ACAF/99/15)**

This paper contained background information on organic farming, outlining the role of the United Kingdom Register of Organic Standards and describing the requirements on organic livestock farmers with regard to animal feed.

- **Letter from the Consumers Association dated 26 November 1999**

This letter summarised the Consumers Association's views on GM Assessment issues.

**ACAF Secretariat  
JFSSG/MAFF  
December 1999**