

**ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS**  
**MINUTES OF THE FOURTH MEETING OF ACAF HELD IN NOBEL**  
**HOUSE, LONDON**  
**4 MAY 2000**

**Present:**

**Chairman**  
**Members**

Professor Phillip Thomas  
Dr Ian Brown  
Mr John Cheetham  
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  
Mr Tony Hitching  
Mr Louis Loizou  
Mr Joseph Nicholas  
Ms Louisa Roddis

**Assessors**

Dr Richard Burt - FSA  
Ms Carolyn Ferguson - FSA (Scotland)  
Professor Cecil McMurray - DARD NI  
Mr Derek Renshaw - FSA

**Officials**

Mr R Anderson - VMD  
Mr T Flower - FSA

1. The Chairman welcomed members to the meeting and conveyed apologies for the absence of Dr Andrew Chesson, and of Julian West and Karen Dell of the Secretariat. Mr Ray Anderson, Carolyn Ferguson and Joseph

Nicholas of the FSA, and Mr Tony Hitching of MAFF, attending their first ACAF meeting, were introduced.

2. Members were asked to check their entry on the register of Members' interests, tabled, and provide the Secretariat with updated information if necessary.

*Action: Members*

3. A number of papers had been tabled: "Biotech; the next generation" from Genewatch; a letter from Dr Fullerton; a letter from the former Chair of the Farm Animal Welfare Council and a copy of a recent consultation on organic standards by UKROFS.
4. The Committee's attention was drawn to the information paper giving a summary of the work of other advisory committees (ACAF/00/13). Paragraph 6 reported the ACRE meeting on 9 March in which ACAF's contribution to the assessment of a GM Fodder Beet was mentioned. Paragraph 11 reported SEAC's consideration of an EU proposal on Specified Risk Materials. The Committee asked that future versions of this paper include a record of significant activities by the Food Standards Agency.

*Action: Secretariat*

5. **Proposed amendment to the Undesirable Substances Directive 199/29/EC.** The Committee's attention was drawn to paragraphs 2-3 of ACAF/00/20, the information paper on EC Developments. The Presidency had proposed that the ban on blending down elevated levels of undesirable substances in raw materials to within maximum permitted limits (MPLs) for compound feeds should apply only where there was a public health risk, e.g. in relation to aflatoxins and certain metals.
6. It was understood that, at present, "blending down" was used in the UK, and that consignments with undesirable substances above the MPLs for individual materials were sent only to approved premises for processing into feed. The Committee was concerned that a ban on blending down undesirable substances within the EU would drive 'dirty' ingredients into other markets with less stringent controls, where they could be processed into feed which could then be imported into the EU or, more likely, fed to animals whose products were then imported into the UK.
7. There was general agreement from the committee that it would favour undesirable substances being dealt with in regulated rather than unregulated circumstances. Its initial view was that a multi-strand approach to

regulation would be appropriate. A new upper level should be set for each undesirable substance and any feed ingredient found to contain more than this level should be destroyed. Between the acceptable level and upper level, blending down should be permitted under regulated circumstances within the EU.

8. The Secretariat was asked to prepare a fuller paper on the EC proposal on undesirable substances for the next meeting, to include the issue of detoxification.

*Action: Secretariat*

## **AGENDA ITEM 1 - MINUTES OF THE PREVIOUS MEETING**

9. The latter part of the first sentence of paragraph 9 was amended to read “....meat and other animal products from animals that had not been fed on genetically-modified (GM) crops or their by-products. The minutes were adopted subject to this change.

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

### **Agenda item 2 - Points arising from visit to mill and farm.**

10. Ray Anderson of the Veterinary Medicines Directorate (VMD) was invited to explain the controls on prescription of medicines to feedingstuffs, following the visit to a farm prior to the last meeting. Controls existed on the addition of zootechnical feed additives and on medicated feedingstuffs. The VMD was in consultation with the Royal College of Veterinary Surgeons and the British Veterinary Association on draft guidelines to those dispensing prescriptions under the Medicated Feedingstuffs Regulations. These guidelines would make it clear that medication in feedingstuffs should be appropriate, must be sufficient only for the number of animals to be treated, and must be given by veterinary surgeons only to animals “under their care”. Copies of this guidance would be sent to members when available.

*Action: Secretariat/Mr Anderson*

11. Bob Moore offered to prepare an information paper on the rules which veterinary surgeons must follow when dispensing and prescribing medicines and to supply copies to members of the BVA’s current guidance to veterinary surgeons on prescribing.

*Action: Secretariat/Mr Moore*

12. Mr Anderson also outlined the current position regarding the ban last year on four antibiotic growth promoters. It was noted that there was currently a wide debate on whether only sick animals should be treated, or whether the treatment should be extended to in-contact animals as a prophylactic measure. There was also reference to experience in countries where a ban on the use of growth promoting antibiotics had led to an initial increase in prescription of therapeutic antibiotics, followed by a decline.

**Agenda item 5 - risk analysis and the role of ACAF.**

13. The Secretariat would provide its promised paper on the precautionary principle at the next meeting.

*Action: Secretariat*

**Agenda item 6 - Draft Feeding Stuffs Regulations**

14. Ministers were yet to decide whether or not to ban non-feed uses of additives in the forthcoming Feeding Stuffs Regulations.

*Action: Secretariat to report to ACAF when decision is known.*

**Agenda item 7 - Assessing Animal Feed Aspects of Applications to market new GMOs.**

15. The Secretariat were arranging a meeting between ACAF and ACRE; it was hoped that this could be timed to coincide with ACAF's fifth meeting on 27 June. The promised paper on the results of a survey on the effects of processing on DNA was not yet ready, but would be provided to members when received.

*Action: Secretariat*

**Launch of the Food Standards Agency**

16. The Committee had been given an information paper on the launch of the Food Standards Agency (ACAF/00/14). Professor Thomas mentioned that he was a member of the Scottish Advisory Committee to the Agency. The Committee noted the FSA's commitment to openness and accessibility.

**Agenda item 8 - AOB - Press Cuttings.**

17. The Committee agreed that the Secretariat should fax press items that referred to ACAF to all members immediately, and that general interest items should be provided on the basis of one set of cuttings between meetings, and one set on the day.

*Action: Secretariat*

**AGENDA ITEM 3 - DRAFT STATEMENT ON ALLEGED ALTERNATIVES TO ANTIBIOTIC GROWTH PROMOTERS (ACAF/00/16)**

18. The Committee looked at a draft statement on the status of various alleged alternatives to antibiotic growth promoters on the market. The statement was still being cleared with various interests. Dr Rice's declared interest in this subject on the lines expressed at the last meeting would again be recorded in the minutes.
19. The Committee endorsed the approach being taken to explain the status of various types of product. It was suggested that a section on hormonal growth promoters should be added to the statement, although it was noted that the use of these was banned in Europe. A number of drafting amendments to the letter were noted.

*Action: Secretariat to redraft and clear the statement.*

20. Mr Anderson said that the Government was looking into alternatives to antibiotic growth promoters as part of considerable research on antimicrobial resistance. This was part of a joint programme between VMD and MAFF's Animal Health Group.

*Action: Secretariat to ask VMD/Animal Health Group to provide an information paper to ACAF on their joint research programme into antimicrobial resistant organisms in livestock.*

**AGENDA ITEM 4 - ACAF CONSULTATION ON ANIMAL FEED LABELLING (ACAF/00/17)**

21. The results of the Committee's recent consultation exercise on Animal Feed Labelling were presented. The Committee considered separately the two main areas identified during the exercise.
22. Respondents had been almost unanimous in wanting all ingredients of compound (i.e. mixed) feeds to be declared in full in descending order by weight. The European Commission's proposal for these to be shown by percentage drew a mixed response. The Committee generally felt that mandatory percentage declaration was not necessary, and could have adverse effects on feed research and innovation. Enforcement would be difficult; there would also be issues of tolerance and trade descriptions to

consider. In discussion the Committee agreed that companies should be obliged to give such information on request by farmers and be allowed to display percentages details on an optional basis.

23. The Committee sought further information before commenting formally on the labelling of GM animal feed. It was noted from the consultation that demand existed from farmers for information on the absence of GM material in feed, but from farming and wider interests also on whether feed did or could contain such material. Among the issues identified during discussion were the defining of the terminology used in the GM debate and the scope for setting thresholds for GM contamination of non-GM crops. It was suggested that it might not be possible to test feed for the presence of products derived from GM crops. It was understood that many consumers opposed the planting of genetically modified crops because of global environmental concerns as well as health concerns.
24. The Secretariat was asked to prepare papers: one would concern terminology such as 'genetically modified', 'non-GM' and 'GM-free' to embrace additives derived from GM crops; another document was sought on methods and limits of detection of genetically modified material. The Secretariat was also asked to advise on what voluntary action the feed industry might be advised to take. Discussion would resume at the next meeting on 27 June.

*Action: Secretariat*

25. The Secretariat was asked to prepare, and clear with the Chairman before sending, a letter to "Food Magazine" responding to criticisms in its last issue of an alleged ACAF stance on the labelling of genetically modified ingredients in animal feed.

*Action: Secretariat*

## **AGENDA ITEM 5 - HOMEOPATHIC/HERBAL ADDITIVES (ACAF/00/18)**

26. The Committee heard a presentation from Mr Anderson of the VMD on the legislation affecting homeopathic and herbal additives. An information paper on functional foods for human consumption (ACAF/00/12 ) had also been provided to the committee. The Veterinary Medicines Directorate has a remit to ensure that anything defined as a "medicinal product", whether medicinal by presentation (principally by claim) or by function is authorised by the Veterinary Products Committee. The VMD would enforce the legislation in respect of verbal claims of medicinal function, but independent evidence would be needed. The committee recognised that the rigorous demands of the authorisation process and the

long time it takes to complete would deter manufacturers from making medicinal claims for herbal products. There could be some overlap between products covered by veterinary medicinal legislation and products covered by legislation on animal feed, such as Directive 93/74/EEC on feedingstuffs for particular nutritional purposes; equally it was recognised that some products might fall outside the scope of legislation altogether

#### **AGENDA ITEM 6 - ACAF OPEN FORUM (ACAF/00/15)**

27. As part of its policy on openness, the committee considered the proposals for an open forum outlined in the paper ACAF/00/15. As an alternative to these, it was suggested that the open meeting could focus on the first ACAF Annual Report. This would allow ACAF's past and future programme to be discussed and provide a structure for the meeting. The committee agreed to the proposal to base the meeting around the annual report.

*Action: The Secretariat would prepare firmer proposals on this basis, to include suggestions for organisations to be invited to allow for balanced representation.*

#### **AGENDA ITEM 7 - FOOD IMPORTS AND THEIR RELATION TO OTHER ANIMAL FEED CONTROLS (ACAF/00/19)**

28. The Committee considered this paper, which looked at imports of animal products for human consumption, and considered the implications of the possibility that such food may not have been produced under similar regimes to those in Europe where animal feed controls are concerned. Within Europe, Directives set broadly uniform standards of animal feeding, and the Food and Veterinary Office of the Commission, based in Dublin, provided an inspection role. The paper also outlined the role of the Codex Alimentarius in setting international standards and drew attention to its Task Force on Animal Feeding which would meet for the first time in Copenhagen in June. The Codex Task Force aimed to produce a Code of Good Practice on Animal Feeding.
29. The Committee was very interested in exploring its role in this area. However, it was felt that further background on systems of quality assurance on food imports was needed before the Committee could make any recommendations on the issue.

*Action: Secretariat to prepare a paper addressing the questions: who imports the meat? ; what checks are made on imported meat? are the checks adequate?*

*Action: Secretariat to set out what is within ACAF competence and options for ACAF action in relation to imports of feed and/or animal products from third countries with less rigorous controls.*

#### **AGENDA ITEM 8 - DATE OF THE SIXTH MEETING.**

30. Members were invited to indicate their availability for the sixth meeting to the Secretariat

*Action: Members*

#### **AGENDA ITEM 9 - ANY OTHER BUSINESS**

31. Members were asked for their views on some initial proposals for an ACAF logo which had been developed by the Secretariat. The committee agreed that ACAF should have its own logo. The Secretariat would develop the proposals further before the next meeting, but asked whether any members would wish to be involved in the design process.

*Action: Secretariat/Members*

32. The Committee wished Louis Loizou well on the occasion of his forthcoming marriage.
33. The Secretariat mentioned that Sir Robert May had written to the Chairmen of all government advisory committees asking them about their approach to risk assessment. Professor Thomas would reply, mentioning that ACAF had considered a paper on this issue at the meeting on 2 March.

#### **PAPERS FOR INFORMATION**

34. The following papers were presented for information:

- An update of Animal Feed Additive and Bio-Protein Dossiers (ACAF/00/11)

- Other EC Developments (ACAF/00/20)
- An Update of the Work of other Advisory Committees (ACAF/00/13)
- Procedures for Marketing Herbal and Homeopathic Products and Functional Foods for Human Consumption (ACAF/00/12)

**ACAF Secretariat  
FSA/MAFF  
June 2000**