ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

46th Meeting of ACAF on 3-5 June 2009

Discussion Paper

Code of Practice for the Control of Salmonella in Feedingstuffs

Action: The Committee is invited to comment on the final (pre-publication) draft of the Code which has been prepared by a working group including members from Defra, the Food Standards Agency's Animal Feed Unit and the feed and livestock industries. The Committee's endorsement of the Code is also being sought.

Secretariat: May 2009

Code of Practice for the Control of Salmonella in Feedingstuffs

Purpose

1. This paper invites the Committee to consider and discuss the prepublication draft of the Code with a view to endorsement of its content and usage by the industry.

Background

- 2. The Committee initially received a presentation from Steve Wyllie (Defra Assessor) at its 43rd meeting on 9 September 2008. This outlined the history and origins of the original Codes published by MAFF in 1989 in response to the salmonella in eggs crisis. Further revisions took place in 1995 to refer to Hazard Analysis Critical Control Points (HACCP) and subsequently to change references from Ministry of Agriculture Fisheries and Food to Defra.
- 3. Prior to the revision there were three Codes:
 - During Storage and Transport of raw materials.
 - In the production of final feed for livestock in premises producing less than 10,000 tonnes per annum.
 - In the production of final feed for livestock in premises producing more than 10,000 tonnes per annum.
- 4. The Codes are used by the industry as part of the three feed assurance schemes (UFAS¹, FEMAS², and TASCC³), and compliance is also a feature of many farm assurance schemes. They may also be referred to in Agricultural Industries Confederation and the Grain and Feed Trade Association trade contracts. Retailer assurance schemes may also indirectly require them via UFAS compliance.
- 5. They are used as training documents, and also may be quoted in litigation, and their existence has helped to prevent an unnecessary proliferation of sectorial codes within the industry, as their governmental origin helps them to be seen as independent of any one sector.
- 6. The update has been triggered by:
 - the introduction of industry assurance schemes;

¹ Universal Feed Assurance Scheme.

² Feed Materials Assurance Scheme

³ Trade Assurance Scheme for Combinable Crops

- the introduction of the Zoonoses legislation in the EU (Directive 2003/99 and Regulation 2160/2003); and
- the Feed Hygiene Regulation (183/2005) which will require compliance with specific microbiological criteria (having an up to date Code may assist the UK negotiations in Brussels).
- 7. Defra carried out a twelve week formal public consultation on a revised version of the codes which ended in January 2009. A range of consultation responses (including from ACAF) were received. The Defra assessor updated the Committee at its 45th meeting on 4 March 2009. The comments were generally supportive and some main themes emerged:
 - that there was a large degree of repetition between the three Codes, and so consideration should be given to having only one Code with three Annexes;
 - the need for clearer and more consistent use of terminology;
 - a (mistaken) belief that certain sectors were not covered by the Code; and
 - conflicting requests, some supporting the less prescriptive HACCP based approach, but others requesting more detailed guidance.
- 8. On balance, the drafting group decided to consolidate the three Codes into one, and this has been taking place over the last two months. The version being presented to the Committee is the final pre-publication draft which has emerged from this process. It is much shorter than the previous three Codes were cumulatively, and issues regarding consistency of wording have been addressed. It also gives more detailed advice on sampling, whilst still retaining the HACCP principles.

Action

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> ACAF Secretariat May 2009