

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

46th Meeting of ACAF on 5 June 2009

Discussion Paper

Feed Hygiene: Guidance To Stakeholders On The Reduction Of Administrative Burdens

Action: The Committee is invited to consider the text of a leaflet that the Food Standards Agency intends to issue to stakeholders on advice relating to reducing administrative burdens on farmers.

Secretariat: May 2009

EC FEED HYGIENE REGULATION

GUIDANCE ON RECORD-KEEPING REQUIREMENTS FOR FARMERS

Purpose

1. To seek the Committee's opinion on draft guidance to assist primary producers (mainly farmers) to comply with the record-keeping requirements of Annex I of the EC Feed Hygiene Regulation (183/2005).

Background

2. Annex I of EC Regulation 183/2005 sets out a short list of record-keeping requirements that farmers must observe.

3. In 2005, the Better Regulation Executive started a cross-Government exercise to measure the administrative burdens of regulations on business in England, including record-keeping requirements. PricewaterhouseCoopers were employed to carry out the measurement exercise using the Standard Costs Model which provides an indicative measurement of burden. At the start of 2007 the administrative burden of the Feed Hygiene Regulation was measured and the cost to farmers of complying with the record-keeping requirements of Annex I of the Regulation was estimated at £58m per annum.

4. A subsequent study commissioned by the Food Standards Agency and carried out by the agricultural consultants, ADAS, indicated that this was a significant overestimate, but still impacted on business. The ADAS study did not use the Standard Cost Model methodology used for the cross-Government exercise. It is the Agency's policy to minimise the impact of regulations where this can be done without compromising consumer safety. The Agency is therefore developing guidance to assist industry to comply with the record-keeping requirements of Annex 1 of EC Regulation 183/2005.

Guidance

5. A first draft of the text of this guidance is attached at the Annex to this paper. The statutory record-keeping requirements that farmers must comply with are shown on page 4 of the Annex. The intention is to trial this guidance with a number of farms to assess its applicability and impact in reducing burdens. The data from this trial will be used to help draw-up an Impact Assessment (IA) and, in line with standard Government procedures, the draft guidance and IA will be subject to a 12-week public consultation. The aim is to issue the guidance formally, before the end of 2009.

Scope, format and distribution

6. The requirements of farm assurance schemes in many cases require members to comply with the provisions of the legislation, including the record-keeping requirements of the Feed Hygiene Regulation. The attached guidance is therefore particularly suited for farms that are not members of assurance schemes, although it is envisaged that it may contain material helpful to members and non-members alike.

7. The aim is to provide guidance in a simple format, which can be easily accessed and followed by farmers. In particular, the intention is that farmers can rely, as far as possible, on existing documentation. For example, one of the requirements is to record information on the source and quantity of each input of feed and much of this information can be obtained from invoices and feed material labels.

8. When the guidance has been finalised, it is the intention that it will be presented in the form of an eye-catching leaflet which can be made available on a UK basis. The Agency will contact farming organisations to investigate distribution to farms and it will be available on the Agency's website. The guidance takes into account the recommendations of the Anderson Review of Guidance which stressed the need for government to give businesses greater certainty over finding, following and interpreting guidance¹.

Action

9. The Committee is invited to:

- a) note this Agency simplification initiative of providing guidance to help farmers comply with the record-keeping requirements of Annex I of EC Regulation 1831/2003;
- b) make any comments on the text of the draft guidance; and
- c) provide views on how the guidance could effectively be presented and distributed to the agricultural industry.

ACAF Secretariat
May 2009

¹ <http://www.berr.gov.uk/files/file49881.pdf>