
Advisory Committee on Animal Feedingstuffs (ACAF)

A Report of the 2009 Quinquennial Review

November 2009

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Summary and Recommendations

Summary

There is a continuing need for ACAF, with value to the FSA, UK agriculture departments and stakeholders, but it is important that ACAF maximises the value that it contributes and continues to provide evidence of its value. The process for determining the work programme should be improved to ensure that the potential value contributed by ACAF is maximised. Completed work should be summarised in terms of outcomes and impact achieved.

Objectives and roles

- There is a continuing need for ACAF, with value to the FSA, UK agriculture departments and stakeholders, but it is important that ACAF maximises the value that it contributes and continues to provide evidence of its value.
- The role of ACAF within its overall remit has evolved over time and clarification of the current role at the next ACAF meeting would be beneficial.
- The Chair and Secretariat routinely confirm at meetings that issues to be considered by ACAF are within its remit, which is an example of good practice and should be continued.
- The exact remit with regard to animal health and welfare should be clarified and formal action taken and recorded in the minutes of the meetings with regard to appropriate liaison with Defra for animal welfare issues.

Work Programme

- ACAF publishes its work programme annually which is an example of good practice and should be continued.
- The process for determining the work programme should be improved to ensure that the potential value contributed by ACAF is maximised.
- Work should be scheduled for each year so as to avoid “light” agendas at meetings, with the number of meetings reduced if the required work does not warrant four meetings a year.
- Completed work should be summarised in terms of outcomes and impact achieved.

Research and Scientific Rigour

- The Chair should continue to ensure that the members of the Committee are aware that they can and should request the commissioning of data from the FSA if the Committee’s view is that it is required in order for them to provide advice.
- Consistent and appropriate scientific support is provided by the FSA’s Animal Feed Branch and it is important for that level of support to be continued.
- It is however recommended that the Committee takes greater steps to show evidence of scientific rigour by using the FSA’s Science Checklist more explicitly and also routinely considering whether peer reviews are appropriate for work on which the Committee’s decisions are based.

Seeking and Using the Committee’s Advice

- The range and type of issues addressed by ACAF means that most of its advice to the FSA is sought and received by the Animal Feed Branch where it is addressed. There has not recently been a need for issues to be referred to the FSA’s Board. However, a brief summary of the Committee’s outcomes and impact achieved would provide an appropriate summary of the Committee’s activities and achievements for the Board.
- In general ACAF follows good practice in formulating and presenting its advice. However, as well as taking greater steps to show evidence of scientific rigour, it should be more explicit in stating the level and type of uncertainty associated with its advice.

- The role of ACAF, whilst based on science, encompasses the practical implementation aspects of science that need to be considered in advising on the safety and use of animal feeds and feeding practices. That is important in advising on risk assessment but has a role to play in advising on risk management options also.
- The FSA needs to ensure that the risk management advice it asks ACAF for does not go beyond advice on risk management options put to them by the Secretariat.

Working with other FSA Committees

- At each meeting ACAF provides an update on the work of other advisory committees in an information paper, which is an example of good practice.
- Work undertaken in conjunction with other FSA committees has been limited. It is recommended that ACAF should work with other committees as appropriate and take proactive steps to consider when that might be appropriate.
- Where there is a difference of opinion between two committees and the FSA needs an agreed approach to take to risk management, the FSA is responsible for taking the risk assessment advice of the two committees and deciding on its risk management options and policy on the basis of that risk assessment advice. The FSA should have internal procedures in place to ensure that any differences of opinion between its own policy units are handled appropriately.

Secretariat

- The Secretariat is held in high regard by members and stakeholders.
- The administrative support provided by the Secretariat is of a consistently high standard.
- Consistent and appropriate scientific support is provided to the Secretariat by the FSA's Animal Feed Branch.

Members and Assessors

- The number of members and the range of expertise represented by the membership are considered to be appropriate.
- The procedure followed for the recruitment of ACAF members is in line with the FSA's requirements for the appointment of members to its scientific committees.
- ACAF's induction of new members is an example of good practice.
- The current system of self assessment by members is not effective and the FSA should consider an alternative approach to the assessment of ACAF members and introduce an appropriate method of assessing the performance of the Chair.
- There is some uncertainty with regard to the exact roles and responsibilities of officials and assessors on the Committee and it would be beneficial to confirm those at ACAF's next meeting.

Meetings

- ACAF's meetings are an example of good practice in terms of well run open meetings which, together with the agenda, papers and minutes of each meeting available on ACAF's website, provide a high level of openness and transparency.
- The out of London meetings are valued by members and stakeholders. It is recommended however that the FSA continues to monitor and take a view on the value of those meetings compared with the cost of running them and reassesses that approach at regular intervals.
- ACAF should consider whether it may be appropriate to set up additional sub-groups to address specific issues in the future, particularly if only one or two members have specific expertise directly relevant to the issue to be addressed.

Good Practice and Recommendations

	Paragraph reference
Examples of good practice	
1. The Chair and Secretariat routinely ensure at meetings that issues to be considered by ACAF are within its remit.	19
2. ACAF publishes its work programme annually.	24
3. ACAF publishes an annual report of its activities	29
4. At each meeting ACAF provides an update on the work of other advisory committees in an information paper.	49
5. The administrative support provided by the Secretariat is of a consistently high standard.	55
6. ACAF's induction of new members is an example of good practice.	60, 61
7. ACAF's meetings are an example of good practice in terms of well run open meetings which, together with the agenda, papers and minutes of each meeting available on ACAF's website, provide a high level of openness and transparency.	65
Recommendations	
1. It is important that ACAF maximises the value that it contributes and continues to provide evidence of its value.	17
2. The role of ACAF within its overall remit has evolved over time and clarification of the current role at the next ACAF meeting would be beneficial.	18
3. The exact remit with regard to animal health and welfare should be clarified and formal action taken and recorded in the minutes of the meetings with regard to appropriate liaison with Defra for animal welfare issues.	20
4. The process for determining the work programme should be improved to ensure that the potential value contributed by ACAF is maximised.	25
5. Work should be scheduled for each year so as to avoid "light" agendas at meetings, with the number of meetings reduced if the required work does not warrant four meetings a year.	26
6. Completed work should be summarised in terms of outcomes and impact achieved.	29
7. The Chair should continue to ensure that the members of the Committee are aware that they can and should request the commissioning of data from the FSA if the Committee's view is that it is required in order for them to provide advice.	31
8. It is recommended that the Committee takes greater steps to show evidence of scientific rigour by using the FSA's Science Checklist more explicitly and also routinely considering whether peer reviews are appropriate for work on which the Committee's decisions are based.	34
9. A brief summary of the Committee's outcomes and impact achieved would provide an appropriate summary of the Committee's activities and achievements for the Board.	40

10. The Committee should be more explicit in stating the level and type of uncertainty associated with its advice.	41
11. The FSA needs to ensure that the risk management advice it asks ACAF for does not go beyond advice on risk management options put to them by the Secretariat.	48
12. It is recommended that ACAF should work with other committees as appropriate and take proactive steps to consider when that might be appropriate.	50,52
13. The FSA should have internal procedures in place to ensure that any differences of opinion between its own policy units with regard to risk management are handled appropriately.	53
14. The FSA should consider an alternative approach to the assessment of ACAF members and introduce an appropriate method of assessing the performance of the Chair.	63
15. There is some uncertainty with regard to the exact roles and responsibilities of officials and assessors on the Committee and it would be beneficial to confirm those at ACAF's next meeting.	64
16. The out of London meetings are valued by members and stakeholders. It is recommended however that the FSA continues to monitor and take a view on the value of those meetings compared with the cost of running them and reassesses that approach at regular intervals.	68
17. ACAF should consider whether it may be appropriate to set up additional sub-groups to address specific issues in the future, particularly if only one or two members have specific expertise directly relevant to the issue to be addressed.	70

Background

Terms of Reference of Review

1. The 2002 Food Standards Agency (FSA) Report of the Review of Scientific Committees¹ recommended that all Scientific Advisory Committees should be reviewed at least once every five years to determine 'whether each committee fulfils its intended function and whether all the current committees are still needed'.
2. The main objectives of this review are to assess:
 - The need for the Advisory Committee on Animal Feedingstuffs (ACAF);
 - Its role, methods of operation and effectiveness; including its terms of reference and composition;
 - The openness and transparency of its procedures and the relationships between ACAF, the commissioning department and other bodies with related responsibilities in particular the other scientific advisory committees which advice the agency; and
 - The implementation of the 2002 review recommendations, the revised code of practice for Scientific Advisory Committees² and the current governance structures.

Methodology

3. The work involved in undertaking this review included:
 - A review of ACAF's website³ and ACAF documentation including minutes, meeting papers and publications published on its website;
 - Attending the ACAF open meeting on 23rd September 2009;
 - Interviews with and written comments from 35 internal and external stakeholders (as listed in the Appendix of this report).
4. The review was undertaken with specific reference to:
 - The FSA's 2002 Report of the Review of Scientific Committees;
 - The Government Office for Science Code of Practice for Scientific Advisory Committees, December 2007;

¹ <http://www.food.gov.uk/science/researchpolicy/commswork/scicomrev>

² <http://www.berr.gov.uk/consultations/page39872.html>

³ <http://acaf.food.gov.uk/>

- The FSA's Good Practice Guidelines for the Independent Scientific Advisory Committees, December 2006⁴;
- The FSA's Science Checklist⁵.

Background to ACAF

5. ACAF was set up in June 1999 to advise on the safety and use of animal feeds and feeding practices, with particular emphasis on protecting human health and with reference to new technical developments and new feed materials and products.
6. The decision to set up the Committee was made in the light of concern about the integrity of animal feeds, particularly over the implications of Bovine Spongiform Encephalopathy (BSE) and the use of genetically modified feed ingredients. The decision was announced in the White Paper, "The Food Standards Agency: A Force for Change"⁶, published in January 1998 and it implemented the principal recommendation of the report of the Expert Group on Animal Feedingstuffs, published in July 1992.
7. The Committee's terms of reference as stated in its annual report⁷ is: "ACAF advises the Food Standards Agency, the Secretary of State for Environment, Food and Rural Affairs, Ministers of the Scottish Government and the National Assembly for Wales, and the Minister for Agriculture and Rural Development in Northern Ireland on the safety and use of animal feeds and feeding practices, with particular emphasis on protecting human health and with reference to new technical developments. In carrying out its functions, the Committee liaises with other relevant advisory committees as appropriate."
8. The annual report and Committee's website state that the Committee's primary purpose is to advise on the safety and use of animal feed in relation to human health but it also covers animal health aspects and a wide range of contemporary issues including advice on the UK negotiating line on new European Community (EC) proposals, animal feed ingredients including genetically modified organisms (GMOs) and labelling and information for purchasers.
9. ACAF is a UK-wide committee and is made up of independent experts appointed by UK Ministers and the Chairman of the FSA. Members are appointed for their individual expertise and experience and are not representative of any sector or organisation. There are currently 12 members (with recruitment in progress for an additional member) and a Chair from wide ranging backgrounds including consumer affairs, farming, the feed

⁴ <http://www.food.gov.uk/science/researchpolicy/commswork/good>

⁵ <http://www.food.gov.uk/science/researchpolicy/commswork/scienceschecklist/>

⁶ http://www.food.gov.uk/aboutus/how_we_work/historyfsa/

⁷ <http://acaf.food.gov.uk/acafannualreports/>

industry and science. Member biographies are provided on ACAF's website⁸ and further details provided in the annual report.

10. The Committee currently meets four times a year. The agenda, papers and minutes of each meeting are provided on ACAF's website⁹.

⁸ http://acaf.food.gov.uk/more_about/membersbios/

⁹ <http://acaf.food.gov.uk/acafmeets/>

Objectives and Roles

11. The objectives and roles of ACAF are summarised in the terms of reference (see paragraph 7 above).
12. The role of ACAF, whilst based on science, encompasses the practical implementation aspects of science that need to be considered in advising on the safety and use of animal feeds and feeding practices.
13. The work undertaken by the Committee within its remit has evolved as a result of changing requirements. When the Committee was first established in 1999 there was a greater need for the Committee to address fundamental food safety issues in the light of BSE and the use of non-authorised material in animal feeds. Also legislation and control is now led by the European Commission (EC) with the European Food Safety Authority (EFSA) providing risk assessment advice and communication.
14. A large part of ACAF's work is therefore now the provision of advice to the FSA on the UK negotiating line on new European Community (EC) proposals, for example the proposed EC regulation on marketing and use of feed. The role of the provision of advice to the FSA on the UK negotiating line on new European Community (EC) proposals is of particular importance and value to the FSA. If ACAF did not exist the FSA would need to consider alternative ways of obtaining this advice from a range of experts with a combination of both scientific and practical knowledge and expertise. It is unlikely that an alternative could be found that would be as effective in terms of the value of its contribution and its cost effectiveness and no appropriate alternative has been identified during the course of this review.
15. In addition ACAF proactively addresses issues that it identifies as being of importance either currently or potentially in the future, for example bio-fuels¹⁰.
16. As well as being important to the FSA in terms of supporting EC negotiations and other animal feedingstuff related issues, this review has also confirmed the continuing importance of an independent committee such as ACAF to external stakeholders. It is anticipated that the importance of ACAF to both internal and external stakeholders will continue for the foreseeable future, as long as ACAF meets their requirements effectively and efficiently.
17. However, it is important that ACAF maximises the value that it contributes and continues to provide evidence of its value (see the Section of this report on "Work Programme" for further details).
18. It is good practice to enable a Committee's role to evolve over time within its overall remit in response to external changes and developments. It would be beneficial to include as a future meeting agenda item a brief discussion of how the role has evolved and clarification of the current role to ensure that there is clarity and agreement of the role among the members and assessors.

¹⁰ <http://acaf.food.gov.uk/papers/biofuels>

19. At the ACAF meeting on 23rd September 2009, the Chair and the Secretariat ensured that issues addressed by the Committee at the meeting and issues to be addressed in the future were within the remit of the Committee. That is an example of good practice. For example, it was agreed that with regard to the audit carried out in the UK by the EC's Food and Veterinary Office in order to evaluate the implementation of measures concerning official controls on feed legislation, it was necessary for the Secretariat to identify the specific points of that audit that are within ACAF's remit and where ACAF can make an impact and for those issues to be addressed at the next meeting.
20. At that meeting there was debate over the exact remit of ACAF with regard to animal welfare. The Secretariat stated that animal health and welfare aspects are within ACAF's remit where they are related to animal feedingstuffs. The Committee's annual report and website both state that the remit of ACAF "also covers animal health aspects". Although this has not been a recurring area of debate, it is recommended that the remit with regard to animal welfare is clarified more fully at the next ACAF meeting to avoid potential future ambiguity.
21. The presence of Defra in the role of ACAF assessor should ensure that appropriate liaison with Defra is undertaken with regard to animal health and welfare issues so that Defra is informed and ACAF does not duplicate work undertaken by Defra. It is recommended that when ACAF's work involves animal health and welfare issues a formal action is taken and recorded in the minutes with regard to appropriate liaison with Defra via the assessor. In some cases it may be appropriate for ACAF to refer animal health and welfare issues to Defra to address via the assessor.

Summary

- ❖ There is a continuing need for ACAF, with value to the FSA, UK agriculture departments and stakeholders, but it is important that ACAF maximises the value that it contributes and continues to provide evidence of its value.
- ❖ The role of ACAF within its overall remit has evolved over time and clarification of the current role at the next ACAF meeting would be beneficial.
- ❖ The Chair and Secretariat routinely confirm at meetings that issues to be considered by ACAF are within its remit, which is an example of good practice and should be continued.
- ❖ The exact remit with regard to animal health and welfare should be clarified and formal action taken and recorded in the minutes of the meetings with regard to appropriate liaison with Defra for animal welfare issues.

	Paragraph reference
Examples of good practice	
The Chair and Secretariat routinely ensure at meetings that issues to be considered by ACAF are within its remit.	19
Recommendations	
It is important that ACAF maximises the value that it contributes and continues to provide evidence of its value.	17
The role of ACAF within its overall remit has evolved over time and clarification of the current role at the next ACAF meeting would be beneficial.	18
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Work Programme

22. The primary role of each of the FSA's Scientific Committees is to advise on the specific issues that are referred to it by the Agency and the other Departments to which it responds. Issues are referred to ACAF by the FSA. The Animal Feed Branch of the FSA seeks the advice of ACAF on the UK negotiating lines on new European Community (EC) proposals for animal feedingstuff issues, for example, the proposed EC regulations on marketing and use of feed. Other Departments also seek ACAF's advice. For example, Defra recently sought ACAF's review and subsequent endorsement of the revised Code of Practice for the control of Salmonella in Animal Feeds¹¹, and the Veterinary Medicines Directorate sought ACAF's view on the use of coccidiostats and histomonostats.
23. Members of the Committees should also be free to propose additional items for consideration and the final decision on whether such issues should be included on the agenda should lie with the individual committee Chair, taking account of competing priorities. ACAF members are specifically invited to put forward suggestions for additional items for consideration. A discussion of those suggestions and the content of the forward work programme was combined with a discussion on horizon scanning at the meeting in September 2009, led by the Chair, and is repeated on an annual basis. The discussion centred around what was to be maintained on the work programme, what was to be monitored and what deleted. The result of this discussion will be a forward work programme for the forthcoming year.
24. Once agreed by the members, the forward work plan for each year is published on the Committee's website and as an annex to its annual report. This is an example of good practice as committees should, at least once a year, publish a forward work plan. The work plan should include a reference to horizon scanning, as the ACAF work plan does. ACAF also follows good practice in retaining important issues on the agenda for monitoring as, in order to provide timely advice to Ministers, scientific advisory committees should keep under review potential future threats, opportunities and key developments in their particular areas of responsibility and which may also lead to revision of previous advice.
25. However, it is recommended that the process followed by ACAF for obtaining and considering suggestions from members and deciding on the future work programme is improved to ensure that the process provides sufficient information for the members to have informed views, and for the Chair to make an informed decision, on what should be included and in what order of priority. For example, each suggestion put forward (and ultimately each item on the work programme) could be accompanied by a brief description of what it is, why it is necessary and within the remit of ACAF, how it would be addressed by ACAF and what the anticipated outcome/impact would be. The purpose

¹¹ <http://acaf.food.gov.uk/papers/copsalanimalfeed>

of this is not to create more work or to deter members from putting forward suggestions, but to provide the basis for a more effective discussion and prioritisation of issues and the planning of the Committee's work for the year ahead.

26. It is recommended that the work programme highlights which items on the work programme it intends to address in the forthcoming year and how. It is recognised that forward work plans can change as issues requiring the Committee's attention can arise at short notice, but by stating the intentions it will set a realistic goal and target for the Committee for the year, which can then be revised justifiably if a number of issues to be addressed arise at short notice. It will also help the Chair and Secretariat to anticipate the forward work load of the Committee and make an informed decision on the number of meetings required in the forthcoming year.
27. The work undertaken for this review has suggested that the agenda for a number of recent meetings has been "light" in terms of content and there have been suggestions that consideration should be given to reducing the number of meetings held each year or cancelling meetings when the agendas for those meetings are "light".
28. A more tightly defined work programme will enable the Chair and Secretariat to ensure that:
- the items on the work programme for the year are well defined in terms of what they are, why they are required, the work that will be done and when, and the anticipated impact of the work;
 - the work and meetings are planned and scheduled in advance to avoid "light" agendas at meetings, with the number of meetings being reduced if the required work does not warrant four meetings a year.
29. ACAF publishes an annual report¹² of its activities which is an example of good practice. The reports include a description of the Committee's work during the year. ACAF also publishes stand-alone reports on specific topics, for example, the recent position paper on bio-fuels¹³. However, it is recommended that when work is completed by ACAF a brief bullet point summary of the work undertaken, the outcomes of the work and its impact is also produced, together with future work to be undertaken in that area if appropriate.
30. Such an approach to determining the work programme and reporting on the work achieved will enable the Chair and Secretariat to ensure that the potential value contributed by ACAF is maximised and to provide both internal and external stakeholders with a clear statement of the work to be undertaken and the anticipated impact of the work as well as the outcome of that work and impact achieved.

¹² <http://acaf.food.gov.uk/acafannualreports/>

¹³ <http://acaf.food.gov.uk/papers/biofuels>

Summary

- ❖ ACAF publishes its work programme annually which is an example of good practice and should be continued.
- ❖ The process for determining the work programme should be improved to ensure that the potential value contributed by ACAF is maximised.
- ❖ Work should be scheduled for each year so as to avoid “light” agendas at meetings, with the number of meetings reduced if the required work does not warrant four meetings a year.
- ❖ Completed work should be summarised in terms of outcomes and impact achieved.

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Examples of good practice	
ACAF publishes its work programme annually.	24
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Recommendations	
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Research and Scientific Rigour

31. ACAF has not commissioned, or requested the FSA or another Department to commission, any research to support its work. However, the Committee is aware that it can and should request the commissioning of data from the FSA if the Committee's view is that it is required in order for them to provide advice. The Chair should continue to ensure that the members of the Committee are aware of that and the circumstances in which they may wish to consider the commissioning of research.
32. Much of ACAF's work is to comment on EC proposals or other guidance and for which it does not need additional data. For example, recent work undertaken by ACAF has included advice to the FSA on guidance on record keeping requirements for farmers with regard to feed hygiene regulation, advice on and endorsement of Defra's revised Code of Practice for the control of salmonella in animal feeds, and a review of proposed EC regulation on marketing and use of feed.
33. The potential for carry-over of allergens from animal feed into derived animal products is an example of where the need for research was considered but was not taken forward. ACAF suggested that research in this area would be useful and feasible but recommended that before research was commissioned the level of allergens (specifically peanut) used in animal feed in the UK should be assessed. Following completion of a desk based investigation, the Committee was recommended to confirm that there was not a pressing need for research into the possible allergen carry-over from groundnuts in ruminant feed to milk or meat. This reflected the fact that peanuts and peanut meal are not currently found in the diet of these animals in the UK (see Information Paper⁽¹⁴⁾ prepared by the ACAF Secretariat). The minutes of the March 2009 meeting⁽¹⁵⁾ where the information paper was discussed stated that the Committee concluded that as peanuts were not routinely used in feed manufactured in the UK, the issue of peanut allergens in livestock products did not arise. However, if the Agency's Allergen's Branch had any new evidence it should pass this to the Committee for further consideration.
34. Consistent and appropriate scientific support is provided by the FSA's Animal Feed Unit and it is important for that level of support to be continued. It is however recommended that the Committee takes greater steps to show evidence of scientific rigour by using the FSA's Science Checklist¹⁴ more explicitly and also explicitly considering whether in some cases peer reviews would be appropriate for work on which the Committee's decisions are based. The Committee should as a matter of course consider whether its draft findings could benefit from peer review by a wider range of experts than those on the Committee. That is particularly important where the Committee is reviewing scientific data that has not been subject to peer review and where only one or two members have a detailed knowledge of the area.

¹⁴ <http://www.food.gov.uk/science/researchpolicy/commwork/scienc checklist/>

Summary

- ❖ The Chair should continue to ensure that the members of the Committee are aware that they can and should request the commissioning of data from the FSA if the Committee's view is that it is required in order for them to provide advice.
- ❖ Consistent and appropriate scientific support is provided by the FSA's Animal Feed Unit and it is important for that level of support to be continued. It is however recommended that the Committee takes greater steps to show evidence of scientific rigour by using the FSA's Science Checklist more explicitly and also routinely considering whether peer reviews are appropriate for work on which the Committee's decisions are based.

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Recommendations

The Chair should continue to ensure that the members of the Committee are aware that they can and should request the commissioning of data from the FSA if the Committee's view is that it is required in order for them to provide advice.

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34

Seeking and Using the Committee's Advice

35. The provision of advice to the FSA on the UK negotiating line on new European Community (EC) proposals is of particular importance and value to the FSA. That advice is generally sought and received by the Animal Feed Unit of the FSA.
36. For example, during 2008, the Committee provided inputs to the UK negotiating line on the proposed EC Regulation on the marketing and use of feed. The regulation was adopted in June 2009 and will come into effect in autumn 2010. The annexes of the regulation are subject to amendment, and it is envisaged that a catalogue of feed materials and codes of practice on feed labelling will be drawn up and the Committee's views sought on those developments.
37. ACAF also addresses issues that it identifies as being of importance either currently or potentially in the future. An example is its Review of Feed Law Enforcement¹⁵. The agreed terms of reference for the review were "to review the whole system of enforcing feed standards in the UK, including official feed law inspections and non-statutory measures, consider any improvements including rationalisation and to make recommendations." The clear definition of the issue and the terms of reference is an example of good practice. The review included a stakeholder consultation which is also good practice for a review of this type. The results of the review included a number of recommended actions for the FSA and other bodies. In response to the report the FSA produced an Action Plan¹⁶ to address the recommended actions. At the March 2008 ACAF meeting the Committee received a progress report¹⁷ on the Action Plan confirming that most of the actions had been completed. This is a good example of where the work of ACAF has had a considerable and direct impact. It is also a good example of where the Committee and stakeholders have clear sight of how the Committee's advice has been received and acted on by the FSA and other bodies.
38. Another example of work undertaken by ACAF and actions taken as a result of that work is its examination of the impact of bio-fuel production on the safety, composition and availability of animal feed summarised in ACAF's position paper on bio-fuels¹⁸. During the course of its review the Committee received a number of presentations from the feed industry and other organisations, which is an example of good practice in terms of seeking input from stakeholders and experts. As a result of its work, ACAF suggested to the FSA that the Animal Feed Law Enforcement Liaison Group (AFLELG)¹⁹ should be asked to consider whether there were any gaps in the controls on materials from the bio-fuel chain. AFLELG considered the issue at its meeting in September 2008 and agreed

¹⁵ <http://acaf.food.gov.uk/papers/feedlawenforcereview>

¹⁶ <http://acaf.food.gov.uk/papers/feedactionplan/>

¹⁷ ACAF 08/03 http://acaf.food.gov.uk/acafmeets/acaf_2008_meetings/acafmeet080305/acafagenda5mar08

¹⁸ <http://acaf.food.gov.uk/papers/biofuels>

¹⁹ <http://www.food.gov.uk/enforcement/enfcomm/aflelg/>

that there was adequate legislation in place to control the use of bio-fuel co-products used in animal feed. Existing legislation contains sufficient powers to allow enforcement officers to deal with situations where feed law requirements had not been met. However, AFLELG thought it was important that bio-fuel companies should be reminded of the legislation that applies to bio-fuel co-products when they are marketed for feed use, and of bio-fuel companies' responsibilities as feed business operators. AFLELG agreed that the FSA should write to organisations representing the bio-fuels industry, explaining the requirements of animal feed legislation. A copy of the letter was sent to local authorities and the Department of Agriculture and Rural Development, Northern Ireland, who are responsible for the enforcement of feed legislation, to remind them of the need to include bio-fuel companies, as appropriate, in their control programmes. AFLELG said that if enforcement agencies became aware that current legislative controls on animal feed were not adequate for dealing with the diversion of bio-fuels co-products, they should bring this to the attention of the FSA.

39. Examples of advice sought by and provided to other Departments is advice sought by and provided to the Veterinary Medicines Directorate (VMD), an Executive Agency of the Department for Environment, Food and Rural Affairs (Defra), on an EC proposal to amend the legislation on the control of coccidiostats and histomonostats, and advice sought by and provided to Defra on its revised Code of Practice for the control of salmonella in animal feeds²⁰ and ACAF's endorsement of that Code. A representative of Defra is an assessor on ACAF and a representative of VMD attends the meetings as an official.
40. The range and type of issues addressed by ACAF means that most of its advice to the FSA is sought by and received by the Animal Feed Branch where it is addressed. There has not recently been a need for issues to be referred to the FSA's Board. However, a brief summary of the Committee's outcomes and impact achieved (see the Section of this review on "Work Programme" for further details) would provide the Board members with an appropriate summary of the Committee's activities and achievements. ACAF advice is communicated within Defra via the Defra assessor according to the issues being discussed and who within Defra they are relevant to, and to the Chief Veterinary Officer and Assistant Chief Veterinary Officer when the assessor considers that there is an issue that they need to be informed of.
41. In general ACAF follows good practice in formulating and presenting its advice, including defining the issues, seeking input, validation, drawing conclusions and communicating its conclusions. It should however ensure that it takes greater steps to show evidence of scientific rigour by using the FSA's Science Checklist more explicitly and also routinely considering whether peer reviews are appropriate for work on which the Committee's decisions are based (see Section of this review on "Research and Scientific Rigour" for further details) and be more explicit in stating the level and type of uncertainty associated with its advice where it is appropriate to do so.

²⁰ <http://acaf.food.gov.uk/papers/copsalanimalfeed>

42. The role of the FSA scientific committees is to advise on risk assessment. It is the FSA's responsibility to manage the risk based on their consideration of that risk assessment. Committees should not be asked to manage risks although they may be asked to provide scientific advice on risk management options. There is no evidence from the work undertaken for this review that ACAF has been asked to manage risk. However, it has been asked to advise on risk management.
43. An example of where ACAF has provided primarily risk assessment advice is its position paper on bio-fuels²¹. That represents risk assessment in terms of ACAF's assessment of the impact of bio-fuel production on the safety, composition and availability of animal feed which led to a specific risk management action being taken by the FSA in terms of writing to organisations representing the bio-fuels industry, explaining the requirements of animal feed legislation.
44. The Review of Feed Law Enforcement²² was primarily risk assessment, but the remit was to make recommendations which are recommendations for risk management, although the risk management itself was undertaken by the FSA and other bodies.
45. The role of ACAF with regard to the Code of Practice for Salmonella in Animal Feeds²³ was partly risk assessment, but also endorsement of Defra's risk management approach.
46. The ACAF Review of On-Farm Feeding Practices: recommendations on identifying hazards and minimising risks²⁴ published in 2003 covers best practice for all stakeholders and their advisers involved in supplying, transporting, storing and using feed. It is intended to be a tool to help farmers and others identify hazards and implement controls and corrective action. It is therefore intended as a risk assessment and risk management tool for end users and as such can be seen as risk management work undertaken directly by ACAF. However, it was undertaken with the full knowledge and support of the FSA which agreed to the remit of the work and the need for the work to be undertaken.
47. More recently the FSA asked ACAF to advise on a guidance note on record keeping requirements for farmers to help them comply with EC feed hygiene regulation²⁵. In that case the guidance, which is a risk management tool, was issued by the FSA, not ACAF, and ACAF were asked by the FSA to advise them on the guidance.
48. The role of ACAF, whilst based on science, encompasses the practical implementation aspects of science that need to be considered in advising on the safety and use of animal feeds and feeding practices. That is important in advising on risk assessment but

²¹ <http://acaf.food.gov.uk/papers/biofuels>

²² <http://acaf.food.gov.uk/papers/feedlawenforcereview>

²³ <http://acaf.food.gov.uk/papers/copsalanimalfeed>

²⁴ <http://acaf.food.gov.uk/papers/acafpubfeedprac>

²⁵ http://acaf.food.gov.uk/acafmeets/acaf_2009_meetings/acafmeet090923/acafagenda090923

has a role to play in advising on risk management options also. The FSA needs to ensure that the risk management advice it asks ACAF for does not go beyond advice on risk management options put to them by the Secretariat. For example, the FSA may consider that it is not in future appropriate for ACAF to publish risk management tools such as the On-Farm Feeding Practices recommendations in its own right, but that it would be more appropriate for ACAF to advise on the risk assessment and risk management options, with the risk management tool being published by the FSA.

Summary

- ❖ The range and type of issues addressed by ACAF means that most of its advice to the FSA is sought and received by the Animal Feed Branch where it is addressed. There has not recently been a need for issues to be referred to the FSA’s Board. However, a brief summary of the Committee’s outcomes and impact achieved would provide an appropriate summary of the Committee’s activities and achievements for the Board.
 - ❖ In general ACAF follows good practice in formulating and presenting its advice. However, as well as taking greater steps to show evidence of scientific rigour, it should be more explicit in stating the level and type of uncertainty associated with its advice.
 - ❖ The role of ACAF, whilst based on science, encompasses the practical implementation aspects of science that need to be considered in advising on the safety and use of animal feeds and feeding practices. That is important in advising on risk assessment but has a role to play in advising on risk management options also.
18. The FSA needs to ensure that the risk management advice it asks ACAF for does not go beyond advice on risk management options put to them by the Secretariat.

	Paragraph reference
Recommendations	
A brief summary of the Committee’s outcomes and impact achieved would provide an appropriate summary of the Committee’s activities and achievements for the Board.	40
The Committee should be more explicit in stating the level and type of uncertainty associated with its advice.	41
The FSA needs to ensure that the risk management advice it asks ACAF for does not go beyond advice on risk management options put to them by the Secretariat.	48

Working with other FSA Committees

49. At each of its meetings ACAF provides an update on the work of other advisory committees in an information paper, which is an example of good practice. For example, for the September 2009 meeting, the paper²⁶ included an update on the work of the Advisory Committee on Microbiological Safety of Food (ACMSF), Advisory Committee on Novel Foods and Processes (ACNFP), Advisory Committee on Releases to the Environment (ACRE), Committee on Toxicity of Chemicals of Food, Consumer Products and the Environment (COT), General Advisory Committee on Science (GACS), Scientific Advisory Committee on Nutrition (SACN), Social Science Research Committee (SSRC) and an update on membership recruitment exercises being undertaken by ACNFP, ACRE, COT and SACN.
50. Work undertaken in conjunction with other FSA committees has been limited. Part of the role of the FSA's General Advisory Committee on Science (GACS) is to help improve the communication between the FSA's Scientific Advisory Committees and to identify and advise on issues that cut across, or fall between, the remits of individual committees. As part of its efforts to address that, regular updates are provided to GACS on issues identified by each of the individual committees that have a cross-cutting or strategic relevance. In the update presented to the GACS meeting in September 2009²⁷ the section on ACAF refers to the Committee's interest in exploring the manipulation of animal feed to enhance the nutritional value of food and which may have interest for other committees, its continuing link with the ACNFP Secretariat on GM issues, and its continuing liaison with the SEAC Secretariat and Defra on TSE/BSE issues.
51. GACS hosted a horizon scanning workshop "Future food production for healthier eating: opportunities and challenges" in June 2009 to build on ideas emerging from previous discussions in ACAF and the Scientific Advisory Committee on Nutrition (SACN). The outcomes of that workshop are currently being considered and are likely to result in additional work areas, some of which may be explored jointly by the two committees and/or other committees.
52. It is recommended that ACAF should work with other committees as appropriate and take proactive steps to consider when that might be appropriate.
53. Individual scientific advisory committees should not seek unanimity at the risk of failing to recognise different views on a subject. These might be recorded as a range of views, possibly published as an addendum to the main report with any significant diversity of opinion among the members of the committee accurately reflected in the report. Where scientific committees work together to address an issue, the same principles should apply. Where there is a difference of opinion between two committees and the FSA needs an agreed approach to risk management, the FSA is responsible for taking the risk assessment advice of the two committees and deciding on its risk management

²⁶ ACAF 09/14 http://acaf.food.gov.uk/acafmeets/acaf_2009_meetings/acafmeet090923/acafagenda090923

²⁷ GACS 4-5 <http://gacs.food.gov.uk/gacsmeets/gacs2009/8sept09/gacsagenda090908>

options and policy on the basis of that risk assessment advice. The FSA should have internal procedures in place to ensure that any differences of opinion between its own policy units are handled appropriately.

Summary

- ❖ At each meeting ACAF provides an update on the work of other advisory committees in an information paper, which is an example of good practice.
- ❖ Work undertaken in conjunction with other FSA committees has been limited. It is recommended that ACAF should work with other committees as appropriate and take proactive steps to consider when that might be appropriate.
- ❖ Where there is a difference of opinion between two committees and the FSA needs an agreed approach to take to risk management, the FSA is responsible for taking the risk assessment advice of the two committees and deciding on its risk management options and policy on the basis of that risk assessment advice. The FSA should have internal procedures in place to ensure that any differences of opinion within its own policy units are handled appropriately.

	Paragraph reference
Examples of good practice	
At each meeting ACAF provides an update on the work of other advisory committees in an information paper.	49
Recommendations	
It is recommended that ACAF should work with other committees as appropriate and take proactive steps to consider when that might be appropriate.	50,52
The FSA should have internal procedures in place to ensure that any differences of opinion between its own policy units with regard to risk management are handled appropriately.	53

Secretariat

54. The Secretariat of ACAF is staffed by three officials from the FSA's Animal Feed Branch. The Secretariat is held in high regard by members and stakeholders.
55. The administrative support provided by the Secretariat is of a consistently high standard. For example, meetings are managed efficiently and effectively, papers are distributed and put on the website well in advance of the meetings, and the meeting minutes are comprehensive and clearly written.
56. The FSA requires that each Secretariat should include, or have immediate access to, people with relevant scientific/technical expertise. The Secretariat of ACAF has immediate access to scientific support within the Animal Feed Branch which provides consistent and appropriate scientific input to ACAF in terms of scientific papers and attendance at ACAF meetings. It is important for that level of scientific support to be continued.
57. In addition to the costs met by the FSA for the provision of the Secretariat staff and the scientific support, the main expenditure incurred by the Secretariat to run the Committee is around £25,000 for holding the meetings, including members' fees and expenses. The cost of publishing the annual report is in the region of £5,000. Other incidental expenses are incurred as required such as recruitment costs.

Summary

- ❖ The Secretariat is held in high regard by members and stakeholders.
- ❖ The administrative support provided by the Secretariat is of a consistently high standard.
- ❖ The Secretariat of ACAF has immediate access to scientific support within the Animal Feed Branch which provides consistent and appropriate scientific input to ACAF in terms of scientific papers and attendance at ACAF meetings. It is important for that level of scientific support to be continued.

Paragraph reference

Examples of good practice

The administrative support provided by the Secretariat is of a consistently high standard.

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Members and Assessors

58. ACAF is a UK-wide committee and is made up of independent experts appointed by UK Ministers and the Chairman of the FSA. Members are appointed for their individual expertise and experience and are not representative of any sector or organisation. There are currently 12 members (with recruitment in progress for an additional member) and a Chair from wide ranging backgrounds including consumer affairs, farming, the feed industry and science. Member biographies are provided on ACAF's website and further details provided in the annual report. The number of members and the range of expertise represented by the membership is considered to be appropriate. The members include two non-specialist members, one with a background in consumer affairs, which is an example of good practice. The meetings are in general well attended by the members and are well run by the Chair, who shows a good understanding of the role and responsibilities of a Chair and has the respect and support of the members and stakeholders.
59. The procedure followed for the recruitment of ACAF members is in line with the FSA's requirements for the appointment of members to its scientific committees. Vacancies are advertised openly and reasonable efforts made to ensure that suitably qualified individuals from all sections of the population have the opportunity to apply. Prospective applicants are provided with an information pack including background information on the Committee, the terms of reference of the Committee, the current membership, the commitments in terms of workload of members, the Secretariat, operating procedures, openness, the appointment process, the job description, the person specification and how to apply.
60. ACAF's induction of new members is an example of good practice. New members are provided with an induction pack which includes:
- Terms of reference
 - ACAF Code of Practice
 - Form for Registering Interests
 - ACAF Fees and Expenses
 - Expenses claim forms
 - ACAF Contact details (including Members, Secretariat and Assessors)
 - ACAF Publication Scheme
 - Food Standards Agency Brochure – About Us
 - Chief Scientist Annual Report
 - Strategic Plan 2005 – 2010
 - Science Strategy 2005 – 2010
 - Defra Presentation – Living within our environment means

- Code of Practice for Scientific Advisory Committees – December 2007
- ACAF Annual Reports and recent ACAF position statements
- Last three sets of ACAF minutes
- Latest edition of FSA News.

61. New members also have an induction meeting with the Secretariat. These are supported by additional visits and training as appropriate, for example a visit in 2008 to two sites producing poultry feed, eggs and egg products.
62. Members receive a remuneration of £160 plus travel expense which covers the preparation required for each ACAF meeting, attendance at the meeting and any consequential actions.
63. Members are currently assessed via a system of self assessment. In general they do not consider that to be an effective means of assessment and consider that they should be assessed by an alternative method, perhaps an assessment by the Chair or the FSA. There is currently no system in place for the assessment of the Chair. It is recommended that the FSA reviews its approach to the assessment of the performance of the Chair and members of ACAF.
64. The number of assessors and officials attending the meetings and their input to the meetings are considered appropriate. The seating at the meetings is arranged so that the presence of observers does not inhibit the Committee's discussions. However, it would be beneficial to remind the assessors, officials and members of the role and responsibilities of officials and assessors on the Committee and how they are appointed to the Committee as there is evidence of some uncertainty with regard to their exact roles and responsibilities. This should be undertaken at one of the meetings to allow for the opportunity for discussion to clarify any queries, and the meeting minutes will then also provide clarification for stakeholders.

Summary

- ❖ The number of members and the range of expertise represented by the membership are considered to be appropriate.
- ❖ The procedure followed for the recruitment of ACAF members is in line with the FSA's requirements for the appointment of members to its scientific committees.
- ❖ ACAF's induction of new members is an example of good practice.
- ❖ The current system of self assessment by members is not effective and the FSA should consider an alternative approach to the assessment of ACAF members and introduce an appropriate method of assessing the performance of the Chair.
- ❖ There is some uncertainty with regard to the exact roles and responsibilities of officials and assessors on the Committee and it would be beneficial to clarify those at ACAF's next meeting.

	Paragraph reference
Examples of good practice	
ACAF's induction of new members is an example of good practice.	60, 61
Recommendations	
The FSA should consider an alternative approach to the assessment of ACAF members and introduce an appropriate method of assessing the performance of the Chair.	63
There is some uncertainty with regard to the exact roles and responsibilities of officials and assessors on the Committee and it would be beneficial to confirm those at ACAF's next meeting.	64

Meetings

65. The Committee currently meets four times a year. ACAF's meetings are an example of good practice in terms of well run open meetings which, together with the agenda, papers and minutes of each meeting available on ACAF's website, provide a high level of openness and transparency.
66. The meetings are open so that interested parties can attend and observe the committee in operation and, although they cannot contribute to the meeting itself, they are invited to make statements or ask questions at the end of the meeting and those statements and comments and the Committee's response are included in the minutes which are subsequently published on the Committee's website.
67. The first item on the agenda for each meeting is the declaration of members' interests when members are asked to declare any relevant changes to their interests in the Register of Members' Interests or any specific interest in items on the agenda. All declarations are recorded in the minutes.
68. Of its four meetings a year, ACAF holds three in London and one out of London. Recent London meetings have generally had around eight external attendees. The most recent meetings in Scotland and Ireland had over 20 external attendees at each, but there were only three external attendees at the meeting in Wales. It is generally considered that the out of London meetings should be retained as they demonstrate the commitment of the Committee to Scotland, Wales and Northern Ireland as well as England and the attendance levels tend to support that view. It is recommended however that the FSA continues to monitor and take a view on the value of those meetings compared with the cost of running them and reassesses that approach at regular intervals.
69. ACAF has one sub-group which is the GM sub-group. It is accountable to the full Committee via the sub-group's Chair, who provides a report at each ACAF meeting. The sub-group did not meet in 2008 and has not met so far in 2009 but it has been asked to provide comments on various documents and this work was carried out through electronic communication.
70. ACAF should consider whether in the future it may be appropriate to set up other sub-groups, either of a long-term nature such as the GM group, or groups that are convened to address a specific issue and then disbanded once that work has been completed. That could for example be appropriate where the Committee has only one or two members with specific expertise directly relevant to the issue to be addressed. Whether or not it will be appropriate will depend on the specific issues to be addressed by the Committee. Sub-groups could also be considered for any work undertaken in conjunction with other committees in the future, with the sub-group consisting of a number of the appropriate experts from each of the Committees.

Summary

- ❖ ACAF's meetings are an example of good practice in terms of well run open meetings which, together with the agenda, papers and minutes of each meeting available on ACAF's website, provide a high level of openness and transparency.
- ❖ The out of London meetings are valued by members and stakeholders. It is recommended however that the FSA continues to monitor and take a view on the value of those meetings compared with the cost of running them and reassesses that approach at regular intervals.
- ❖ ACAF should consider whether it may be appropriate to set up additional sub-groups to address specific issues in the future, particularly if only one or two members have specific expertise directly relevant to the issue to be addressed.

Paragraph reference

Examples of good practice

ACAF's meetings are an example of good practice in terms of well run open meetings which, together with the agenda, papers and minutes of each meeting available on ACAF's website, provide a high level of openness and transparency.

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Recommendations

The out of London meetings are valued by members and stakeholders. It is recommended however that the FSA continues to monitor and take a view on the value of those meetings compared with the cost of running them and reassesses that approach at regular intervals.

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ACAF should consider whether it may be appropriate to set up additional sub-groups to address specific issues in the future, particularly if only one or two members have specific expertise directly relevant to the issue to be addressed.

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Appendix: List of contributors to the review

ACAF Secretariat

Keith Millar (Secretary)	Food Standards Agency
Mandy Jumnoodoo	Food Standards Agency
Raj Pal	Food Standards Agency

ACAF members

Ian Brown	ACAF Chair
Bruce Cottrill	ACAF member
Diane McCrea	ACAF member
Marcus Themans	ACAF member
Edwin Snow	ACAF member
Richard Scales	ACAF member

ACAF assessors

Tim Franck, Animal Feed Branch	Food Standards Agency
Jayne Griffiths, Higher Executive Officer, Primary Production Team	Food Standards Agency, Wales
Stephen Wyllie, Deputy Head, Public Health Protection, Livestock Demographics and Surveillance	Department for Environment Food and Rural Affairs
Glenn Kennedy, Head of Chemical Surveillance Branch	Agri-Food & Biosciences Unit, Northern Ireland
Stuart Herd, ex Policy Head of Animal Feed	Food Standards Agency, Scotland

ACAF officials

*Janis McDonald, Lead Policy Officer, Feed Additives, Research & Enforcement	Veterinary Medicines Directorate
Ray Smith, Animal Feed Branch	Food Standards Agency

Other stakeholders

Judith Nelson, previous Head of Sector Animal Feed	Agricultural Industries Confederation
Hannah Moule, Transport and Inputs Adviser	National Farmers Union

Jaume Galobart i Cots, Senior Scientific Officer	European Food Standards Agency
George Starrett, Nutritionist	John Thompsons & Sons Ltd
Keith Agnew, Business Development Director	United Feeds Ltd
Bob Pass, Market and Technical Manager, Animal Feed	Diageo Global Supply
*Harry Evans, Secretary General	British Association of Feed Supplement and Additive Manufacturers
*Monika Prenner, Technical and Regulatory Affairs Manager	Pet Food Manufacturers Association
*Anthony Andrews, Director	Responsible Use of Medicines in Agriculture
*Stephen Nixon, Senior Quality Assurance Officer	Department of Agriculture and Rural Development, Northern Ireland
*Johnathan Napier, Department of Biological Chemistry	Rothamsted Research
Colin Blakemore, Chair	General Advisory Committee on Science
Sarah O'Brien, Chair	Advisory Committee on the Microbiological Safety of Food
Peter Aggett, Vice Chair	Scientific Advisory Committee on Nutrition
Andrew Wadge, Chief Scientist	Food Standards Agency
Claire Baynton, Head of Novel Foods, Additives and Supplements Division	Food Standards Agency
Alison Tedstone, Observer, Scientific Advisory Committee on Nutrition	Food Standards Agency
Robert Martin, Secretariat, Advisory Committee on Microbiology Safety of Food	Food Standards Agency
Adekunle Adeoye, Secretariat, Advisory Committee on Microbiology Safety of Food	Food Standards Agency
<i>All of the above were interviewed for the review except for those marked with an asterisk who contributed written comments.</i>	