

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

54th Meeting of ACAF on 1 June 2011

Discussion Paper

Potential Gaps in the Feed Chain

Action required

The Committee is asked to:

- **consider and comment on the above identified possible gaps and weaknesses that may compromise the UK feed chain; and**
- **advise on any other possible gaps/weaknesses.**

In addition, the Committee may wish to consider if it requires any further information to help it consider the above points.

**Secretariat
May 2011**

Potential Gaps in the Feed Chain

Purpose

1. This paper considers possible gaps and weaknesses in the UK feed sector which may compromise feed and food safety. The aim is that following the identification of any such gaps/weaknesses and the appropriate follow-up remedial action carried out by the feed industry, feed enforcement authorities or central government, the likelihood of a major feed safety incident in the UK will be reduced.

Background

2. There have been a number of high profile feed safety incidents which have affected the European feed industry. Notable major incidents have involved dioxins: Belgium (1999), Ireland (2008) and Germany (2010). However, there have also been incidents involving extensive contamination of feed by other substances and a selective list of recent major incidents is attached at Annex A.

3. Besides food/feed safety implications, such incidents often have widespread economic effects, with contaminated feed and food withdrawn from the market and restrictions placed on feed businesses, including farms, resulting in reduced confidence in the feed industry.

4. In 1989, as a result of criminal activity, feed highly contaminated with lead was put into the feed chain in the UK, which resulted in unsafe levels of lead in animal products and widespread restrictions on feed, food products, and animals. Since then, although there has been no incident of comparable magnitude in the UK, there have been lesser incidents that have affected the UK. Moreover, major incidents in other Member States indicate that there is no room for complacency and that it is essential that any significant weaknesses and gaps are identified.

Possible Feed Safety Gaps/Weaknesses

5. Based on information on previous feed safety incidents, and the results of Food and Veterinary Office audits of Member States' enforcement systems, a number of possible areas of weaknesses have been identified some of which are inter-related . These are set out in the following paragraphs.

Identification of feed businesses

6. The EU Feed Hygiene Regulation (1831/2003) requires that feed businesses are either approved or registered by national enforcement authorities. Approval involves a prior inspection of premises and applies to mainly businesses, manufacturing or marketing certain feed additives and premixtures. Registration applies to virtually all other feed business establishments, including farms and involves placing establishments on a list with follow-up checks by authorities.

7. It is important that all feed businesses are identified by enforcement authorities, in order that businesses' feed safety hazard systems can be checked. However, FVO audits indicate that although Member States have generally completed approvals of establishments, registration of all establishments have rarely been completed. In the report on its audit of UK feed law enforcement systems in 2009, the FVO indicated that it was necessary for the UK to complete its registration of all feed business establishments. In particular, many food businesses establishments supplying human food for feed use had not been registered, as well as farms that buy-in and mix feed additives (e.g. vitamins and trace elements) which are required to apply the principles of HACCP.

'Peripheral' feed ingredients

8. In the current economic climate it is desirable to optimise the use of potential feed materials. There is the supply of surplus food (e.g. out of date, off-specification

products) for feed use and there is the use of various co-products from the food and drink industries. There are also biofuel companies that supply co-products of bioethanol/biodiesel manufacture for feed. New types of feed materials may be developed to optimise sustainability (e.g. micro-algae).

9. Many businesses supplying such products may be members of assurance schemes (e.g. FEMAS) and/or registered by local authorities and the use of co-products and surplus food etc has clear environmental benefits as otherwise they would have to be disposed outside of the feed chain (e.g. landfill). However, there is the risk that businesses may market co-products or 'peripheral' products which are not fit for purpose as feed. This may be for commercial gain or from a lack of diligence in carrying out a risk assessment on new or unusual products. There is risk that material from food manufacturers/retailers may contain meat products which are prohibited for use in feeds by TSE legislation. The Committee has previously considered risks associated with the presence of food packaging in feed.

Unauthorised feed additives

10. Feed additives must be authorised for use in feeds under EU Regulation 1831/2003 and must undergo an assessment for safety, efficacy and quality. However, from time to time the Agency is notified of feeds containing unauthorised feed additives (e.g. micro-organisms). The use of 'grey area' products whose status as feed additive or feed material is not clear is a potential source of risk.

Awareness/Competence of Feed Business Operators

11. There is a wide range of businesses involved in feed activities. These include manufacturers of premixtures, additives and compound feeds, importers, traders, transporters and primary producers (farms). Some of these businesses may only be engaged in feed-related activities part-time, e.g. haulage companies may be involved in carrying other non-feed/food material.

12. Such businesses must comply with the wide range of feed legislation in place, including (except for most farms) the application of the principles of a Hazard Analysis and Critical Control Points System (HACCP) and the maintenance of records to ensure the traceability of feeds. Some companies engaged in feed activities, may be unaware of the applicable legislation or have not applied it properly (e.g. the application of HACCP or the requirement to register as a feed business establishment). Voluntary industry feed assurance schemes provide additional checks on feed business operators, but not all operators are members of such schemes

13. Moreover, there may be ignorance by some that the feed chain is part of the food chain and should not be a disposal route for sub-standard material. Feed users, including farms must only purchase material from registered feed establishments. In extreme cases there may be the potential for criminal activity to be involved in diverting material for feed use that has previously been condemned or designated as inappropriate for feed use by unscrupulous traders.

14. Even where such businesses have safety systems in place, it is possible that such systems are compromised or not adequately applied. There have been a number of cases where excessive levels of additives have been incorporated in feeds by registered feed businesses. Recently, feed containing excessive Vitamin A manufactured by a UK feed business was distributed to a number of farms and resulted in the deaths of lambs. The Irish dioxin incident 2008 was caused by the use of inappropriate fuel in the feed drying process at a registered feed business, but this had not been identified as a critical control point.

Imports

15. A number of feed incidents have been related to feed imported from non-EU countries. In December 2008, melamine, a chemical used in the manufacture of resins and plastics, had been found in organic soya expeller from the Peoples' Republic of China (PRC). The melamine had been added to increase nitrogen levels in the product to indicate a falsely higher protein content when subjected to analysis.

There have also been regular findings of contamination in feed additive products often, but not only, from PRC. In 2011, for example, feed additive products from the PRC were found to be contaminated with chloramphenicol, an unauthorised antibiotic which is genotoxic. Lack of controls at point of entry was highlighted by the FVO audit of the UK enforcement systems.

On-farm incidents

16. Each year, there are a number of feed safety incidents originating on-farm, that are reported to the Food Standards Agency, sometimes involving the deaths of animals. Sometimes these incidents are attributable to poor practices, e.g. spreading of chicken litter on pastures leading to a possible source of botulism. However, incidents related to single farms are usually limited in their extent and do not often have the potential to cause a nationwide incident e.g. because of the relatively small number of livestock involved and the dilution of certain livestock products such as milk, would mitigate the effects of any contamination. The incidents known to the Agency, are in practice, usually contained before animals or livestock products reach the food chain.

Lack of action by enforcement bodies.

17. It is a requirement of EU feed and food law that Member State enforcement authorities should undertake risk-based inspections of feed business establishments to check systems in place to control hazards. However, the FVO audit of feed law enforcement in the UK in 2009 revealed significant weaknesses in official controls with some local authorities carrying out little in the way of checks. The FVO made 17 recommendations to improve feed law enforcement, some of which have already been highlighted in this paper, and all are being addressed by the UK. A complete list of the recommendations is included at Annex B.

Legislation

18. Since the Belgian dioxins incident in 1999, EU feed legislation has been extensively reviewed and strengthened. In response to recent feed incidents the

Commission has pointed out that the legislation in place is adequate if it is properly followed by feed business operators and adequately enforced. However, as a result of the German dioxin incident in 2010, the Commission is considering introducing a requirement for the approval of fat/oil blenders and mandatory monitoring of fats/oils for dioxins by feed business operators. Annex C summarises the main EU legislative measures in place.

Conclusion

19. The Committee is asked to:

- consider and comment on the above identified possible gaps and weaknesses that may compromise the UK feed chain; and
- advise on any other possible gaps/weaknesses.

20. In addition, the Committee may wish to consider if it requires any further information to help it consider the above points.

Secretariat

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