

**ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS**

**58<sup>th</sup> Meeting of ACAF on 15 June 2012**

**Presentation Paper: Assuring Food Safety in Northern  
Ireland - Report and Recommendations of the Northern  
Ireland Industry Feed Assurance Group**

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**June 2012**

# Agenda Item 3

## **Assuring Food Safety in Northern Ireland – Report and Recommendations of the Northern Ireland Industry Feed Assurance Group (IFAG)**

### **Overview**



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# Sections

1. Industry Feed Assurance Group report:
2. Feed Trade Undertakings
3. Industry Concerns



# 1. Industry Feed Assurance Group Report



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# IFAG Report

- IFAG Group ran for approximately 1 year under the Independent Chairmanship of Professor Patrick Wall ( University College Dublin (UCD))
- January 2011 Report published in response to the Dioxin crisis of December 2008
- **Purpose** : to determine actions to be taken across the agri-food supply chain to reduce risk of introducing contaminated feed into the livestock/ poultry supply chain.



# Industry Membership:-



# Key Recommendations

- All **processors** in each sector will aspire to **source livestock** and livestock products **only from Quality Assured farms**.
- All major feed suppliers should participate the proposed UFAS Scheme **as amended to take account of Risk Management**, (or a recognised scheme of equivalent standing).
- **The Feed sector**, including the importers, should combine their resources and move to Strategic Risk based sampling



# Key Recommendations

- The industry and the Regulators should collaborate to:
  - share their risk assessments, sampling and inspections in order to maximise the effectiveness of controls.
  - gain recognition for those farm and processing businesses with enhanced controls, so that inspectors can be redeployed to areas of greater risk.

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# Key Points To Bear In Mind

- 1 The agri food industry came together as one body to work on an **integrated** supply chain solution;
- 2 Mutual commitments entered into across the chain:
  - The feed suppliers will develop a risk based approach
  - Processors will make their contracts of purchase conditional upon farmers purchasing only from an enhanced quality assured supply chain (**thus no feed business can survive unless it is within such a scheme**)

**Concept of “Demand Pull/ Customer Led Quality assurance”**



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## 2. Feed Trade Undertakings



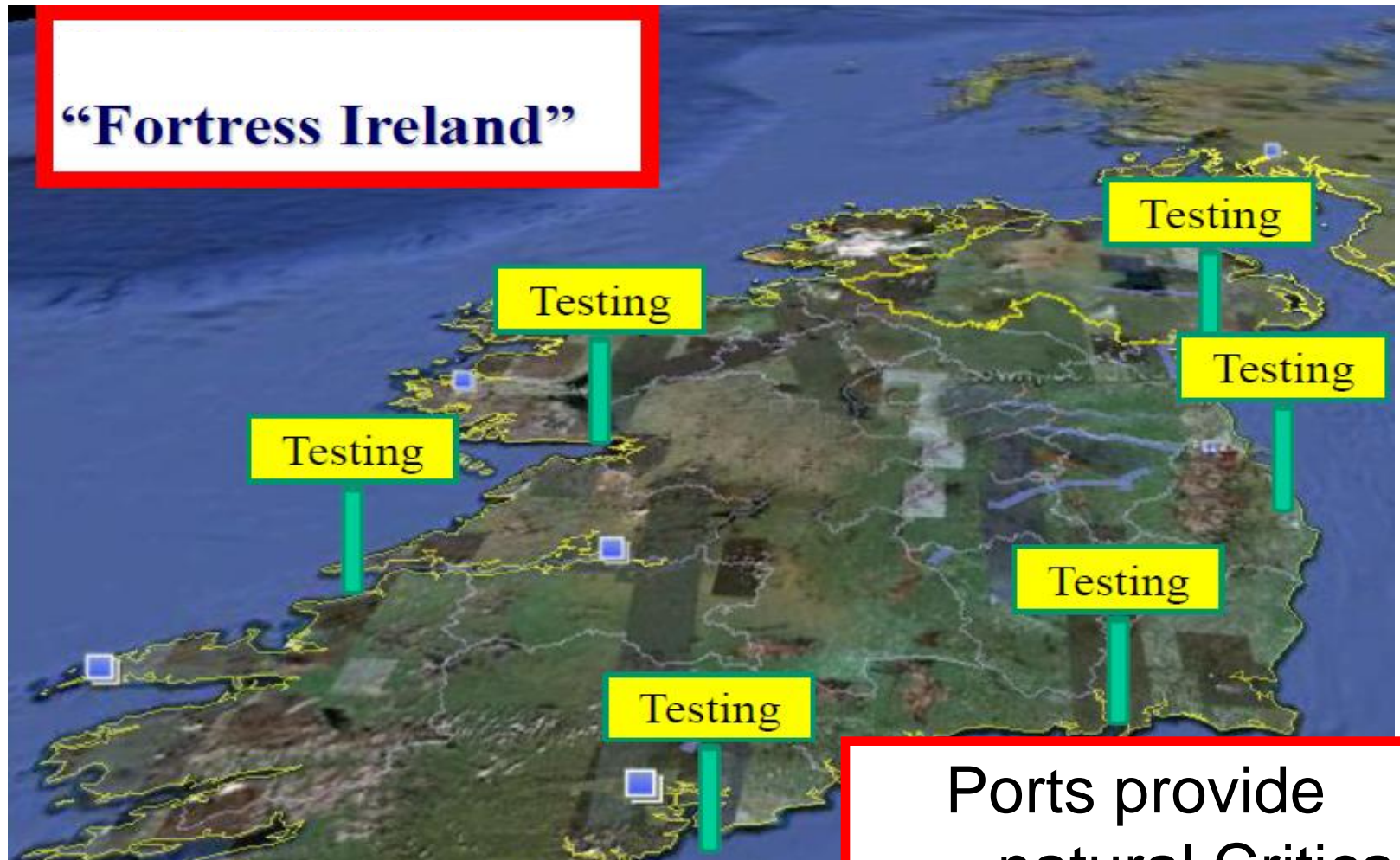
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# NIGTA Commitments

- 1 To develop a Risk Based scheme open to all within the Feed Trade in Northern Ireland
- 2 To work with its counterpart in ROI (IGFA) to extend to an all island solution, taking advantage of the one Island status to manage risk further back in the supply chain at port of entry.
- 3 To build upon the existing UFAS/FEMAS platforms (with the important independent audit function already built in)
  - Effectively a Northern Ireland / All Island Risk mgt module bolted on to existing schemes



# Commitment to All Island approach provides opportunities



Ports provide  
natural Critical  
Control Points<sup>11</sup>

# Current Testing Approach

Current event detection lead-time for contaminated finished feed is a function of:

Period between an event happening and a contaminated sample being taken

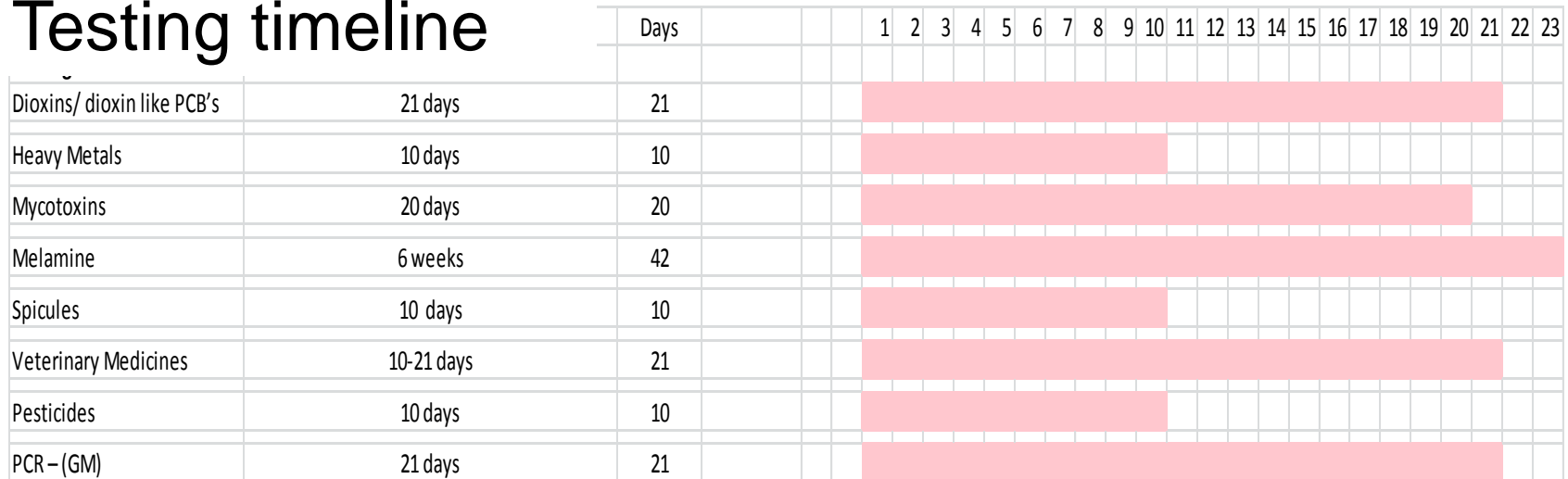
- + Period over which samples are taken and composites built
- + Transport and testing time.

Result is that often product is being consumed before a bad result is known.



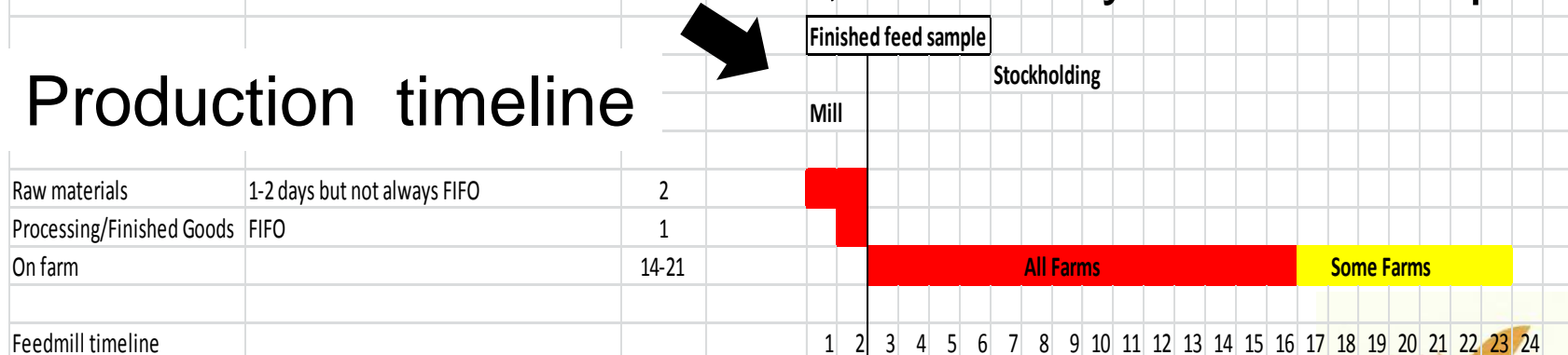
# Typical Testing Lead-time Against Production and Consumption cycle

## Testing timeline



**NB:** assumes best case at mill, ie no delay to build composites

## Production timeline



# Proposed Approach

1. Structured sampling plan – at Port to increase time available for testing before feed actually reaches the farm.
2. Increased sampling of items with a history of events and where the consequences are severe (risk based approach).
3. Industry wide structured sampling plan means businesses can rely on industry results to prove compliance over time and thus do not need to build their own composites.
  - Thus reducing the delay in testing as a result of “batching for composites”.



# Working Group Structure

- All Island Technical Working Group drawn from Importers/ Feedmills, Fats/ Oils and Premix companies from across Ireland:
  - Enables project to draw upon the wealth of knowledge within the industry
  - Provides advocates for the road shows to promote the scheme to industry.
- Chaired by Independent Chairman Professor Pat Wall (University College Dublin)
- Independent expertise on building risk model provided by Professor Chris Elliot (Queens University Belfast)





# Road Map

1. Build risk model by Sub sector
  - ( importers, premix, fats/oils, compounders)  
**(complete except for Fats/ oils)**
2. Establish Base line testing within industry
  - **Survey underway**
3. Calculate sampling requirements (statistically based)
  - **Paper in preparation**
4. Perform GAP analysis
5. Develop new industry wide sampling plan
6. Implement, monitor and tailor as required.



# 3. Industry Concerns



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# Industry Concerns

If feed suppliers have a choice it will be between:

1. **Current scheme-** no change
2. **Proposed scheme** - More cost, More risk of detection of technical breaches,
  - giving rise to reputational risk and product recall risk (with associated recall and disposal costs)

Businesses will naturally shy away from option 2 unless Processors, give mills no choice but to work to the new standard.

- To date NI processors only will make the new standard a requirement of their supply chain.
- Is this enough to move the industry?



# New Approach Increases Detection of Technical Breaches

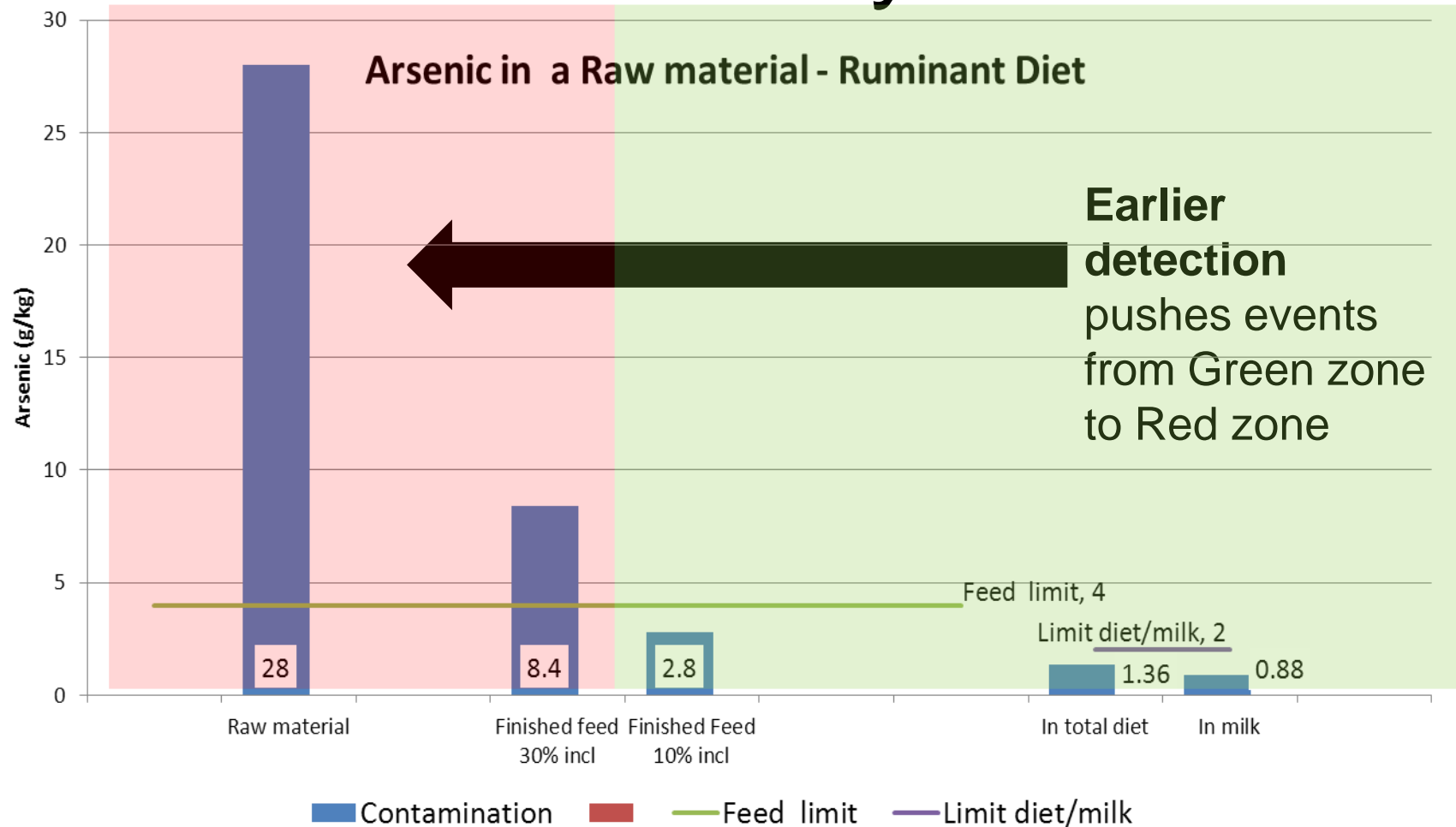
The proposed approach has the effect of pushing events:-

- **away** from farm (where product already consumed or dilution has already taken place resulting in on Farm feed being legal.)
- **Towards** Raw materials (where event will be concentrated, above legal limits and capable of being quarantined/ recalled and destroyed).

New approach may result in detecting more technical breaches (where legal limits are exceeded but animal welfare issues do not arise)



# Impact of Technical Breach Under New System.



# Industry Concern Summarised:

## Technical breach

In seeking to avoid a welfare issue the system may throw up more technical breaches (where legal limits are exceeded but animal welfare issues do not arise). Cost of which could bankrupt a business:-

- Cost recovery under GAFTA contracts restrictive
- Mixing – unable to claim back good stock contaminated with bad stock
- Reputational damage with customers.

# Industry Concern Summarised

## Welfare risks

- Logistics of emptying bins, and replacing feed on farm
  - If major event, do mills have capacity to replace 1 – 2 wks feed immediately
  - Availability of replacement commodities
- Replacing Micro ingredients ( eg vitamin B2, its absence could cause more problems than a technical breach could)

# Conclusion

Corrective action and sanctions by Regulators should be undertaken in such a way as not to undermine consumer confidence or disrupt the food chain any more than is absolutely necessary in the interest of protecting both animal and human health. Otherwise Ireland may become a pariah for the world market ( to many events):

- RM suppliers may perceive Irish Mkt too sensitive.
- Customers of Processors perceive Ireland to be a hot-bed of events. (underlying events remain unchanged but detection rates have improved.)