

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

62nd Meeting of ACAF on 9 October 2013

**Presentation Paper: Update on Feed Law Enforcement
Review Implementation Programme**

The Committee is requested to:

- a) note the progress on the Feed Law Enforcement Programme; and
- b) comment on the work carried out and issues arising.

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September 2013

Update on Animal Feed Implementation Programme

Purpose

1. This paper provides an update on the Animal Feed Implementation Programme. The programme was established to improve the current feed law enforcement delivery system by working more closely with Local Authorities (LAs) and relevant stakeholders to ensure an effective, efficient and proportionate risk-based service that protects consumers.

Background

2. There are a number of project work-streams contributing to the programme:
 - updating the Feed Law Code of Practice (Code) to reflect changing risks within the feed industry;
 - developing the recognition and role of assurance schemes within the feed industry;
 - reducing the burden of inspections, enabling controls to be focused on more pressing priorities;
 - better provision of data between LAs and the FSA to enable better targeting of interventions; and
 - working with Other Government Departments (OGDs) involved in different aspects of feed to share information to effectively prioritise interventions and reduce duplication and costs where possible.
3. The programme is progressing well and project milestones are being met and delivered on time. Outlined below is a summary of the work completed and current stages of projects.

Updating Feed Law Code of Practice

4. The Code of Practice sets out instructions and criteria to which LAs should have regard when engaged in the enforcement of animal feed law. Following

engagement with LAs a revised draft Code has been written. This will be subject to a 12 week consultation commencing in September 2013. The FSA's response to views and comments from stakeholders will be published early in 2014.

5. The main themes that have been revised are:

- a proposal to move from a GB wide Code to a UK country specific code of practice. This recognises each country's needs and priorities with regard to animal feed controls.
- revised comprehensive competency based criteria for the authorisation of officials to provide greater flexibility over the authorisation of officers and better targeting of resources and skills; and
- increased use of earned recognition of feed industry assurance schemes and levels of compliance by reducing inspection frequency and better targeting of LA inspections.

Recognition of Approved Assurance Schemes

6. The revised Code provides information on how assurance schemes have been mapped against existing feed legislation and how the FSA will be informed of businesses that have not met assurance scheme criteria. There is also an emphasis on the importance of feedback from LAs following inspections of businesses that are part of an assured scheme.
7. Primary producers (farms) which are part of an approved assurance scheme will become subject to a 2% inspection frequency. The possibility of similar levels of official control for sectors which are low-risk and part of approved assurance schemes is also allowed for. These changes will mean inspections will become more focused on risk.

Other Government Departments Co-ordination

8. There are a range of Government Departments or Agencies – Defra, Veterinary Medicines Directorate, Rural Payments Agency and the Animal Health

Veterinary Laboratories Agency – with a remit that involves regulation of animal feed businesses. As part of the Animal Feed Implementation Programme, co-ordinating inspection data and registration information has been an essential part of contributing to the response to the recommendations of the Food and Veterinary Office audit of UK feed law enforcement.

9. This work is progressing well with positive engagement from OGDs. A data base is being developed that collates information held from a range of sources about regulatory compliance. The risk rating developed from this analysis will be a step change in how LAs plan their annual inspections. This will provide accurate registration data and a holistic view of a business's regulatory compliance.

Better Provision of Data

10. In tandem with the above mentioned work, the Agency has been working to ensure all the planned changes will be delivered in an efficient way. We have been using data from the OGDs Agencies and industry to check whether the data held by the FSA about animal feed premises is accurate. We plan to use this new 'master list' as the basis to understand the impact that earned recognition and the revised Code will have on the workload of each LA involved. This will provide a clearer picture of the regulatory checks that are planned and will reduce the potential of multiple visits by different organisations in short timescales. There will be reciprocal arrangements so that LAs also share their inspection plans and results with OGDs so that visits to businesses with good compliance are not duplicated.

Regional Coordination with National Trading Standards Board (NTSB)

11. Work on developing a regional co-ordinated approach through NTSB is underway and the FSA is on target to have a contract in place in the autumn. This will have benefits for LAs including a reduction of duplication in their processes to deliver targeted inspections, and this will enable LAs to use resources more effectively on a regional basis.

Conclusion

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- a) note the progress on the Feed Law Enforcement Programme; and
- b) comment on the work carried out and issues arising.

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