

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

57th Meeting of ACAF on 7 March 2012

Discussion Paper:

POTENTIAL GAPS IN THE FEED CHAIN: AWARENESS AND COMPETENCE OF FEED BUSINESS OPERATORS

Action: the Committee is asked to:

- a) note the information contained in Annex I of this paper and advise if there are any other organisations involved in the provision of advice on the use of feed;
- b) consider and comment on the initiatives by a number of organisations to strengthen the qualifications of feed advisers and to create a register of such advisers; and
- c) note the findings of the recent FVO audit of feed controls and the various feed incidents linked to competencies/awareness of feed business operators and the steps being taken to address these, and make any comments.

Secretariat - February 2012

Potential Gaps in the Feed Chain:

Awareness and Competence of Feed Business Operators

Purpose

1. To provide the Committee with further information on the issues relating to the awareness/competence of feed business operators and to request that it comments on the issues raised in this paper, which are summarised at paragraph 13.

Background

2. At its meeting on 1 June 2011, the Committee discussed a paper (ACAF 11/09) on the possible gaps and weaknesses in UK feed sector controls, which may compromise feed and food safety. One of the issues identified was the awareness and competence of feed business operators, in particular those persons and businesses that are responsible for providing advice to users of feed, and the Committee requested further information on this area.

3. This paper therefore primarily provides an overview of organisations identified as involved in the provision of education/qualifications/support which may be applicable to those providing advice on feed and of certain relevant initiatives in this area.

4. In addition, the paper informs the Committee of two other areas which it may find helpful in its consideration of the awareness and competence of feed businesses. These are:

- the findings of the recent Food and Veterinary Office (FVO) audit of some deficiencies in feed business operating systems; and
- some recent examples of legislative non-compliances due to apparent failures at feed businesses.

Feed Advisers

5. A major issue of concern is that persons and businesses that provide advice to farmers on the use of feeds require no formal qualifications or experience. The nutritional requirements of animals (pigs, poultry, ruminants) can vary widely, according to different

production systems. The risk is that advice from advisers lacking the necessary knowledge and experience may not address these requirements, resulting in the supply of feed products which are unnecessary or do not address specific nutritional requirements of animals and in some cases compromise animal health or consumer safety. Examples may include the administration of excessive levels of feed additives such as trace elements and vitamins. Members will recall from the recent discussions on the *Guidance Note for Supplementing Copper to Bovines* the complexity of assessing the supplementation of livestock diets.

6. At its meeting on 1 June 2011, the Committee mentioned a number of organisations that may have relevance in the area of the provision of education and qualifications to those providing advice on animal nutrition, feeds and feeding to farmers. The Food Standards Agency (FSA) has obtained some further information on relevant organisations which is set out at Annex I. In addition to organisations identified that may have a direct relevance on qualifications for feed advisers, details of other organisations that are involved in enhancing the skills of farmers have been included.

Findings of the Food and Veterinary Office (FVO) audit of UK feed controls.

7. The EU Feed Hygiene Regulation (1831/2003) requires feed businesses (other than farms) to have ‘staff possessing the skills necessary for the products concerned’. For most farms, the requirement is ‘The person responsible for feeding and handling of animals shall possess the requisite ability, knowledge and competence. The FVO did not find direct deficiencies regarding compliance with this provision. However, at some feed businesses it identified a number of shortcomings in the application of HACCP-related procedures and systems. Examples of deficiencies included the following:

- the generic nature of some of the adopted HACCP procedures;
- a HACCP plan did not include some key steps set out in the process flow diagram of the establishment;
- in a number of compound feed and premixture manufacturers that the FVO visited, hazard analysis and risk assessment supporting the monitoring arrangements was incomplete. This included a case where the sampling programme for monitoring undesirable substances could not be justified on the basis of hazards identified and had not been amended in the last six years to

reflect changes in the products or suppliers used. In one feed mill, the hazard identification covered only part of the ingredients used. The FVO identified a failure to notify the competent authorities of findings of an exceedance of a maximum permitted level of undesirable substances in feed;

- in some feed businesses there was an absence of information on checks carried out by suppliers or on their production processes, that would have assisted in the hazard analysis of bought-in materials;
- a deficiency in the observation of controls that set maximum permitted levels of carry-over of coccidiostats in feeds for non-target species; and
- non-observance of provisions relating to the export of banned/unauthorised feed additives to third countries (non-EU countries). Export of such products is permitted as long as certain conditions are complied with, including confirmation that the products intended for export can be legally marketed in the receiving third country.

8. The FSA met with industry representatives (including assurance scheme managers) on 16 February 2012 to discuss the above findings. During the following months the FSA will work with the industry to ensure that the points are communicated to individual feed businesses and that HACCP-related systems reflect the necessary steps and controls.

Feed Incidents

9. Feed businesses including farms are required to report to the competent authorities incidents of feed contamination which have an adverse effect on animal or human health. Annex II lists those incidents reported to the FSA which appear to be attributable to the lack of competence of feed business operators. This Annex lists some of the incidents that were reported to the Agency in 2011.

Discussion

Feed Advisers

10. While it may not be expected that all persons providing advice on the use of feed should have a degree or similar qualification in animal nutrition, standards could be strengthened by the formal registration of feed advisers based on experience, training and continuing professional development (CPD). From the information obtained by the FSA (Annex I), there are three organisations (the Agricultural Industries Confederation, the Association of Nutrition, and the British Society for Animal Science) that are active in strengthening the role of animal nutritionists or feed advisers. The Committee may wish to consider whether it would be helpful to have a presentation by one or more of these organisations to obtain further information on initiatives planned or ongoing.

11. As indicated at paragraph 6 above the information contained in Annex I also contains information on other organisations providing education, etc to the agricultural industry. This includes a short description of the work of BASIS, which runs the FACTS scheme covering advisers on the use of fertilisers and may be an example of a scheme that could similarly be applied to a system for the accreditation of feed advisers.

Findings of the FVO and feed incidents

12. As detailed in paragraph 7 above, the FVO has identified certain shortcomings in the systems at feed businesses. In addition, the FSA routinely receives reports of feed contamination incidents which may be attributable to failures of feed business systems or lack of awareness. The Food Standards Agency is already in contact with the feed industry with a view to addressing the FVO's findings. This provides an excellent opportunity for feed businesses to ensure that their hazard management systems are fit for purpose and to help avoid feed contamination incidents.

Conclusions

13. The Committee is asked to:

- d) note the information contained in Annex I of this paper and advise if there are any other organisations involved in the provision of advice on the use of feed;

- e) consider and comment on the initiatives by a number of organisations to strengthen the qualifications of feed advisers and to create a register of such advisers; and
- f) note the findings of the recent FVO audit of feed controls and the various feed incidents linked to competencies/awareness of feed business operators and the steps being taken to address these, and make any comments.

**Secretariat
February 2012**

EXAMPLES OF ORGANISATIONS IDENTIFIED THAT ARE INVOLVED IN THE PROVISION OF EDUCATION/QUALIFICATIONS/SUPPORT WHICH MAY BE APPLICABLE TO THOSE PROVIDING ADVICE ON FEED

Agricultural Industries Confederation (AIC)

AIC (the organisation representing the UK feed manufacturing industry) is in discussion with its membership about the formation of a register of feed advisers. The aim of such a register would be to improve livestock nutrition and skills, training and advice in this sector. An open meeting of its membership took place on 1 February 2012 and will be followed up during the course of the year. Possibilities include competencies to be demonstrated by a mix of experience and training.

Agriskills Forum

This is a strategy launched in 2008, with organisations such as NFU, AHDB (Agricultural and Horticultural Development Board) and LANTRA (the UK sector skills council for land-based and environment industries) to address skills and training within agriculture. The Agriskills strategy is contained in the Agr-Skills document *'Towards a New Professionalism'*. One of the key recommendations was for the recognition of existing skills and skill development activities. An action was therefore to develop robust recording and validating systems to capture the skills and training on-going within different sectors. Continual Professional Development (CPD) schemes are a way of capturing this and enabling an individual's professionalism to be authenticated. This has been developed in the pig industry with the Pig Industry Professional Register (<http://www.bpex.org.uk/2ts/Training/Pipr.aspx>) and is a model that could be developed if further nutritional advice or training for nutritionists or producers was required. The dairy sector is looking to develop a CPD scheme and the poultry industry have the Poultry Passport in place.

Animal Medicines Training Regulatory Authority (AMTRA)

AMTRA is an independent regulatory body which oversees the marketing and distribution of animal medicines in the UK. AMTRA manages a Register of Suitably Qualified Persons (SQP). Entry on the register is based on examination in association with Harper Adams University College.

Association of Nutrition - Register of Nutritionists

The UK Voluntary Register of Nutritionists was established to recognise and encourage high standards of professional training in nutrition. The following is an extract from its website:

Associate registration is for those who have recently graduated from a BSc (Hons) or MSc in a nutritional science, usually within the last 2 years. Associates will have the evidence of underpinning scientific knowledge in evidence-based nutrition but not necessarily the evidence of practical skills and experience. Graduates from most BSc (Hons) courses in nutritional science are eligible to apply for Associate Nutritionist status. An Associate is normally a supervised practitioner (i.e. will normally work in an appropriate team with some degree of relevant professional oversight and/or mentoring), and will not normally engage in wholly independent practice. The title ANutr/APHNutr may only be used whilst applied skills are being acquired to allow transfer to full registration. It is not expected that an individual will remain on the Associate level for an unlimited period of time, but is expected to apply for Associate registration within 5 years (normally after attaining three years of professional practice).

BASIS

BASIS (Registration) Ltd is an independent standards setting and auditing organisation for the pesticide, fertiliser and allied industries. Amongst other things BASIS:

- offers a range of examinations and recognised qualifications for people working in the pesticide, fertiliser and related sectors;
- manages the professional registers for qualified pesticide and fertiliser advisers and for public health pest control professionals; and
- operates the BASIS Advanced Contractor Certification Scheme (BACCS) and the new Amenity Assured standard to raise and maintain good practice standards in the amenity and industrial pesticide sectors.

The registers require members to hold a recognised qualification; agree to a code of ethics; and commit to a programme of CPD. Organisers of CPD training events must submit details of their programmes to BASIS ahead of the event for assessment and allocation of CPD points. Points are awarded for a range of activities from reading technical publications to training seminars and attendance at conferences and exhibitions. To stay on the register, members must accrue a specified number of points every year.

The registers include FACTS advisers. This is a certification scheme for those selling fertilisers to farmers and/or advising on the use of nutrients.

The British Institute of Agricultural Consultants (BIAC)

BIAC operates an up-to-date register of members showing their skills and contact addresses. Amongst other things, it provides members with relevant information and knowledge to assist them with their ongoing and continuous professional development.

The British Society of Animal Science (BSAS)

BSAS is intending to establish a register of animal scientists and technologists. A brief summary of the scheme that has been received is attached at Annex IA. The scheme is intended to be wide in scope covering research scientists to farm technologists. It is understood that BSAS is contacting a number of organisations to join the scheme which would be open to non-BSAS members.

Defra

The agricultural industry itself leads in promoting skills development, but Government supports this and plays a role in facilitating the right conditions to allow skills to be developed. As part of this, Defra works with the industry-led Agri-Skills Forum which aims to drive forward, influence and coordinate on skills issues.

Defra wants to ensure that agriculture is a good career option and to encourage new entrants into the sector. It is keen to encourage people to think of new and creative ways to enter farming and then make use of land, and to consider different career options in wider agriculturally related professions as well as traditional routes of entry.

Other

Mole Valley Farmers (a feed manufacturer and merchant) has joined with Harper Adams University to organise a course for a diploma in ruminant nutrition which is advertised as suitable for those who work in sales, technical or advisory positions within the ruminant feed industry.

Annex I A

**Register of Animal Scientists & Technologists
British Society of Animal Science with the Society of Biology**

The British Society of Animal Science is the professional accreditation body for the Register of Certified Animal Scientists & Technologists. The Scheme is run together with the Society of Biology, which also provides oversight.

The Register aims at assuring competencies, knowledge and integrity through entry level qualifications and an audited programme of Continual Professional Development (CPD).

The Register is open to applications from all those involved directly and indirectly in the various disciplines relating to the care, sustainability and productivity of both food-producing and companion animals.

For accredited members, the scheme provides:

- public recognition of competencies, knowledge and professional status;
- evidence to support career development opportunities, and the fostering within employer organisations of a culture of staff training and skills development; and
- verification of responsible and reputable conduct and practice.

Individuals must re-register every three years, and in so doing present their credentials demonstrating CPD and maintenance of skills and knowledge. These credentials are scrutinised and weighed by an accreditation panel whose composition reflects the designated expertise of the individual.

Annex II

FEED INCIDENTS IN 2011, THAT MAY BE ATTRIBUTABLE TO THE LACK COMPETENCY OF FEED BUSINESS OPERATORS

| Date | Incident | Apparent Cause |
|------------------|---|--|
| December 2011 | Ergot in silage used to feed suckler cattle. | Incorrect storage, or baling too soon after mowing, of grass. |
| November 2011 | Salinomycin in a premixture. | Cross-contamination with a veterinary medicine due to inadequate cleaning of the production line (claimed as due to “operator error”). |
| October 2011 | Ionophore toxicity in dairy calves. | Cross –contamination with a veterinary medicine during feed production process- not detected due to inadequate sampling methods. |
| September 2011 | Excess copper in cattle feed. | Manufacturer’s failure to: (a) correctly label the content; and (b) provide instructions for the correct use of feed. |
| July-August 2011 | Consumption by cattle of medicated feed for pheasants | Insecure storage of the feed by the farmer, thus allowing cattle access to it. |
| July 2011 | Allergenic reaction in suckler cattle (20 deaths). | Traced to a batch of mouldy sweet potatoes included in mixed fruit and vegetables (former foodstuffs) received from retailers. |
| May 2011 | Monensin toxicity in broilers. | Inclusion in poultry feed of an ionophore at twice the recommended rate (claimed as due to “operator error”). |
| May 2011 | Selenium toxicity in sheep. | Sheep allowed to graze on pasture to which a grass fertiliser had recently |

| | | |
|---|---|---|
| | | been applied -- claimed as due to absence of instructions for the fertiliser's proper use. |
| April 2011 | Excess levels of vitamin A in lambs sent for slaughter. | Equipment failure during manufacture of a milk replacer feed, resulting in the addition of high levels of vitamin A. |
| April 2011 | Undiagnosable deaths in beef suckler cattle. | Investigation by the Animal Health and Veterinary Laboratories Agency (AHVLA) suggested this may have been due to feeding of frost-damaged sugar beet. |
| April 2011 | Undiagnosable deaths in an organic sheep flock. | AHVLA investigation suggested the incident may have been due to a veterinary medicine mixed for delivery as a drench -- the active ingredient either settling out of suspension or being inadequately mixed prior to feeding. |
| March 2011 | Dioxins in fish oil | A fish oil was used as an ingredient of a compound feed. Although dioxin levels in the fish oil were within the maximum permitted levels, incorporation in the compound feed resulted in the compound feed MPL being exceeded (the MPL for the fish oil ingredient is higher than the MPL for the compound feed). |
| Four incidents in September/December 2011 | Botulism in dairy cows. | Usually caused by allowing cattle access to poultry litter spread on fields, heaped in the corner of a yard, etc. |