DRAFT MINUTES OF THE FIFTY-FOURTH MEETING OF ACAF HELD ON 1 JUNE 2011

Present:

Chairman	Dr Ian Brown
Members	Dr Dozie Azubike Dr Paul Brantom Dr Bruce Cottrill Mr Barrie Fleming Professor Stephen Forsythe Professor Ian Givens Professor Nigel Halford Ms Diane McCrea Mr Richard Scales Mr Edwin Snow Mr Marcus Themans
Secretariat	Mr Keith Millar (Secretary) – Food Standards Agency Miss Mandy Jumnoodoo – Food Standards Agency Mr Raj Pal – Food Standards Agency Dr Ray Smith – Food Standards Agency Mrs Stephanie Cossom – Food Standards Agency Ms Saleha Khatun – Food Standards Agency
Assessors	Mr Simon Craig – Food Standards Agency, Scotland Dr Glenn Kennedy – Agri-Food & Biosciences Institute
Speakers:	Mr Patrick Burke Defra
Officials:	Mr David Carruthers Food Standards Agency (part) Mr David Mortimer Food Standards Agency (part) Mr Ron Cheesman Food Standards Agency (part) Mr Gerard Smyth Food Standards Agency Northern Ireland Mrs Janis McDonald Veterinary Medicines Directorate

1. The Chairman welcomed visitors to the ACAF meeting and reminded them that there would be an opportunity to ask questions at the end of the meeting.

2. Apologies for absence were received from Mr Tim Brigstocke, Mrs Heather Headley, Mr Tim Franck (FSA Assessor), Mrs Vicki Reilly (FSA Wales Assessor) and Mr Stephen Wyllie (Defra Assessor).

3. The Chairman noted that this was Mrs Headley's last meeting. He thanked Mrs Headley for her work in being an extremely knowledgeable and active Member.

Agenda Item 1 – Declaration of Members' Interests

4. Members of the Committee were asked to declare any relevant changes to their entries in the Register of Members' Interests, or any specific interest in items on the agenda. Professor Nigel Halford declared that he provided a presentation on contaminants to PepisCo. Dr Cottrill confirmed that he had been appointed as a Member of EFSA's CONTAM Panel. Ms McCrea confirmed that she had an interest in Agenda item 3 on Update on the TSE Regulations as a former consumer representative on the Spongiform Encephalopathy Advisory Committee, who had provided advice on this issue.

Agenda Item 2 – Draft Minutes of the Fifty-Third Meeting (MIN/11/01)

5. The minutes were adopted without change.

Agenda Item 3 – Update on the TSE Regulations

6. Mr. Burke explained that processed animal protein (PAP) was rendered animal protein from Category 3 animal by-products (as defined in Article 10 of Regulation (EC) no 1069/2009)[1]. The total feed ban (banning the feeding of PAP to all farmed animals) was introduced in 2001 to control certain transmissible spongiform encephalopathies (TSEs). This control reinforced previous bans and was introduced in response to the detection of new cases of bovine spongiform encephalopathy (BSE) in mainland Europe. However, there were a number of derogations from the total feed ban which allowed the feeding of fishmeal to non-ruminants, non-ruminant blood proteins to non-ruminants, and non-ruminant blood meal to fish. Mr. Burke said that since 2001 the number of BSE cases in the EU had declined. In 2010 the European Commission published its TSE Roadmap 2 – "A strategy paper on Transmissible Spongiform Encephalopathies for 2010-2015". This document outlined areas where future possible changes to EU TSE-related measures could be made, underlining that any amendments would assure a high level of food safety, be stepwise and be supported by scientific advice.

7. Mr. Burke explained that strategic goals of the TSE Roadmap 2 included reviewing certain measures of the total feed ban when certain conditions were met. It considered the possibility of lifting the ban on the feeding of PAP derived from non-

[1] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:300:0001:0033:EN:PDF

ruminants (e.g. pigs, poultry and fish) to non-ruminants of a different species. This was subject to the availability of validated tests to determine the species of origin of PAP and correct channelling (segregation of single species) of PAP from different species. However, the intra-species recycling ban (in the Animal By-products Regulation) would remain in force. Mr. Burke provided Members with examples of where the partial relaxation of the total feed ban would be applicable. It was noted that a narrow set of new derogations were envisaged.

8. Mr. Burke then considered the latest version of the European Commission's draft proposal to establish new criteria for feeding non-ruminant PAP (excluding fishmeal) to non-ruminants of a different species. This included channelling and testing controls (see Annex 3 to ACAF/11/07).

9. Risk-based testing of feed would be required. The UK currently carried out this type of testing; however, new tests would need to be carried out. Currently, microscopy was the statutory test for PAP in feed under Regulation (EC) 152/2009 on laying down the methods of sampling and analysis for the official control of feed, but microscopy did not determine the species of origin.

10. Mr. Burke explained that a DNA-based Polymerase Chain Reaction (PCR) test for bovine PAP had been validated via the SAFEED-PAP[2] research project which aimed to develop new tests for animal protein in feed. The European Union Reference Laboratory for animal protein in feed (EURL-AP) was in the process of developing PCR tests for PAP from other species. This validation was due to be completed before the end of 2011 and Regulation (EC) 152/2009 would be amended once validation has been achieved.

11. The Commission's proposal drew on advice provided by the European Food Safety Authority (EFSA) in 2007 which advised that the BSE risk of feeding pig PAP to poultry and *vice versa* was negligible. In addition, the Spongiform Encephalopathy Advisory Committee provided advice in 2008 on relaxation of the ban on feeding non-ruminant PAP to non-ruminants.

12. Mr. Burke outlined the potential impacts of partial relaxation of the total feed ban. In terms of dietary benefits, pig and poultry PAP were valuable protein/mineral sources. The expected reduction in imported protein (e.g. soya) used in feed, and in fishmeal used in aquaculture, would provide environmental/sustainable benefits. Economically, there could be a positive impact (i.e. possible reduction) on feed prices. Other possible benefits included new export markets for PAP and increased ability for EU producers to compete with their counterparts in non-EU countries where the ban did not apply. However, Mr. Burke advised that the specific impact in the UK was uncertain as most PAP produced in the UK was currently used in pet food or in fertiliser.

[2] http://safeedpap.feedsafety.org/

13. Finally, Mr. Burke said that there would be further discussions on the EU proposals during 2011 in parallel with EURL-AP validation of the PCR test. If the PCR test was validated, a Commission proposal was likely to be voted on in late 2011. If agreed, 3 months scrutiny would apply before entry into force sometime in 2012.

Discussion

14. One Member of the Committee noted that microscopy could detect 0.1% PAP in feed and asked how this related to a safe level of prions. Mr. Burke said this was difficult to answer. Experiments had shown that very small doses of BSE-infected brain could infect calves. However, in 2011 EFSA had published a scientific opinion[3] on a quantitative risk assessment (QRA) of the BSE risk posed by PAP. This concluded that assuming a 0.1% contamination with non-ruminant PAP the total BSE infectivity that could enter cattle feed each year would result in less than one new BSE infection in the EU each year.

15. Members discussed the validation of the PCR method. One Member of the Committee commented that it was assumed that the method will work; however, his understanding was that this method could lead to false positives. Mr. Burke noted that the EURL-AP was aware of this issue and had proposed that PCR would be used with microscopy. In response to a comment from the ACAF Chairman, on the length of time it had taken to develop a validated test for PAP, Mr. Burke said that the Animal Health and Veterinary Laboratories Agency (AHVLA) had offered[4] an internally validated PCR test[5] for a number of years. However, patent and technical issues had caused difficulties in transferring the PCR methodology between laboratories.

16. Following a question from a Member of the Committee on enforcement requirements where the wrong feed had been given to animals, Mr. Burke said that this would be covered by the sanctions provisions in Regulation (EC) 882/2004. However, while national TSE legislation provided powers for restricting or culling ruminants which had been exposed to meat and bone meal, it was not clear what Member States would be expected to do to animals following a breach of the intra-species recycling ban in pigs or poultry. Mr. Burke agreed to seek clarification from the European Commission on this issue. The Member considered that a harmonized approach across the EU would be essential.

[3] http://www.efsa.europa.eu/en/efsajournal/pub/1947.htm
[4] http://vla.defra.gov.uk/vlascientific/docs/vlas_test_feed.pdf
[5] Cawthraw, S., Saunders, G.C., Martin, T.C., Sawyer, J., Windl, O. and Reaney, S.D.(2009) Real-time PCR detection and identification of prohibited mammalian and avian material in animal feeds. J. Food Prot. 2009 May; 72(5):1055-62.

17. Only 50% of feather meal produced in the EU is used in petfood so there is scope for a more sustainable use of the remainder. One Member of the Committee said that feather meal was used as a source of amino acids.

18. The Member also thought that the timing of the proposal for the partial relaxation was not being based on science and asked why it had taken so long. Mr. Burke stated that political considerations and consumer acceptance were factors in the timing of the development of the proposal. Another Member of the Committee responded that consumer confidence was important in accepting the proposal given that previously unacceptable practices were being used and that people were still being diagnosed with variant CJD. Therefore, the Member advocated that a cautious and precautionary approach should be taken. Scientific and technical advances may not all be viewed as a positive step by consumers. It was also noted that it had taken 15 years to develop the science, but it may take longer to allay consumer fears. It was important to move forward and ensure that there were appropriate scientific risk assessments to support the proposal.

19. One Member of the Committee considered that there were animal health and welfare benefits of feeding PAP to pigs, noting that some health issues had arisen in the wake of the total feed ban. Another Member noted that the total feed ban had also had an adverse effect on poultry production and possibly even some poultry products.

20. A Member of the Committee noted that he was content with the proposal but thought ELISA testing was a better indicator of animal protein in feed than PCR testing. Mr. Burke responded that the channelling controls were the key measure to prevent intra-species recycling. The feed test was simply a tool to measure compliance. He noted that AHVLA had moved away from the ELISA test as there were problems with this methodology. For example, the proteins could become undetectable as a result of the rendering process. PCR was used to detect DNA as a marker for PAP. DNA inside bones was more protected from damage by rendering. Following a question from the ACAF Chairman, Mr. Burke said that tests specifically for prion proteins in feed were not used.

21. One Member understood that the PCR test, if validated, would be a qualitative test rather than a quantitative test. Mr. Burke agreed that it would be used to determine the presence or absence of PAP (within the limits of detection). There had been no significant progress in developing a validated test for quantifying the level of PAP in feed.

22. The ACAF Secretary asked Mr. Burke what the current UK position was on this issue and whether other Member States shared a similar view. Mr. Burke replied that the UK did not yet have an agreed position on this proposal. Some other Member States

supported the proposal, some opposed it and most were considering their positions. The FSA Board would consider its advice on the proposal in July[6].

23. Mr. Burke agreed to provide Members with a further progress report at a future meeting.

Action: Secretariat/ Mr. Burke

Agenda Item 4 - German Dioxin Incident - Update

24. Dr Ray Smith (ACAF Secretariat) reminded Members that at its March 2011 meeting, the Committee were unable to advise on the merits of the new measures proposed by the German authorities as some aspects of the incident were unknown. He said that as a result of the German Dioxin incident, measures proposed by the European Commission may be voted on at the July Standing Committee on the Food Chain and Animal Health (Animal Nutrition Section). Investigations into the source of the incident were still on-going. Dr Smith referred to ACAF Paper 11/08 which outlined the possible new controls including, at Annex II of the paper, proposals for the introduction of a mandatory programme of sampling and analysis of products destined for feed use and for some products for technical use.

25. Dr Smith noted that the Agency had commented on the Commission's first draft of its working paper. These FSA comments were contained in Annex I of ACAF paper 11/08. It is important that any new measures suggested by the European Commission as a result of this incident should be proportionate to the risk.

Discussion

26. Members were keen to learn whether it was known how the incident occurred. Dr Smith confirmed that investigations are continuing but indications are that technical material for non-feed use found its way into feed. If current legislation had been adhered to and enforced, the incident would not have occurred. The ACAF Secretary said that investigations in Germany were still on-going and that any measures proposed by the European Commission needed to be proportionate. Dr Smith was unsure whether a report of the findings by the German police would be published.

[6] The ACAF Secretariat was subsequently informed that the FSA Board would consider its advice on the proposal in September 2011.

Agenda Item 5 – Feed Safety – potential gaps

27. Mr Joseph Nicholas of the Agency's Animal Feed Branch introduced paper 11/09. He said that most instances of contamination are attributable to human error –inadvertent rather than deliberate – but may be high profile because of their widespread effects. He commented that the MacDonald Review – (the Independent Farming Regulation Task Force) which recommended a 'lighter touch', more risk-based approach to regulation could lead to increased instances of contamination although its recommendations are generally aimed at farmers rather than the feed industry. The Government's response to the review is still being considered.

Discussion

28. The ACAF Chairman asked Members for their comments on ACAF Paper 11/09 including where any other areas had not been identified or additional information is required. The ACAF Secretary added that the outcomes from the European Commission's Food and Veterinary Office (FVO) audit of the UK in June 2009 were annexed to the paper. A new audit by the FVO is due to take place later in 2011. During its last visit the FVO team was critical of certain aspects of the UK's enforcement activities. The ACAF Secretary suggested that the Committee should consider the FVO's recommendations to identify where any further work was required.

29. One Member of the Committee, suggested that the area of identification of feed businesses remains an issue, as there was a lack of appreciation of the need to register in some cases. In addition imported feed may present additional risks. Mr Ron Cheesman of the Agency's Enforcement and Local Authority Delivery Division agreed that imports are a higher risk. The FVO pre-audit plan indicates that the FVO audit team wish to visit two major points of entry in the UK. The audit will also concentrate on feed safety management systems (FSMS) including traceability under Regulation EC 183/2005 laying down requirements for feed hygiene. During its last visit the FVO was of the opinion that some feed business operators had not adequately implemented their feed safety management systems. Mr Cheesman also said that enforcement officers were working together to identify food businesses that should be registered as feed businesses.

30. One Member of the Committee noted that risks due to criminal activity had not been included in the paper, and suggested that penalties for criminal activity need to be reviewed. Other observations made by the same Member were that the MacDonald review proposes more stringent oversight of poor performers; that businesses need to be educated about their need to be registered; and sources of appropriate nutritional advice (if good advice is provided this results in better production and compliance with the Regulations). Members were glad to hear that enforcement officials were working together. However, they questioned whether adequate enforcement resources were being allocated.

31. Mr Cheesman responding to a question from a Member of the Committee, on what resources were being given to local authorities to address the recommendations from the last FVO audit, said that the FSA was considering how it could support local authorities with regard to feed enforcement activities, and would be providing its conclusions shortly.

32. Members discussed the provision of advice, noting that they were not aware of any formal system to register or hold formal qualifications to act as an animal nutritionist, although they were aware of such a system existing for crop advisors. One Member confirmed that the Association for Nutrition manages a register of accredited nutritionists, including animal nutritionists. The Member agreed to provide details of the Association and its work. Another Member of the Committee suggested that FACTS (Fertiliser Advisers Certification and Training Scheme) was an example of a well-regarded fertiliser training body that sets and maintains standards of advice given by individuals on farm. This body has 2,500 qualified advisors and could be used as a model for training feed nutritionist advisors.

Action: ACAF Members

33. The ACAF Secretary thanked Mr Franck for preparing the paper. He suggested, and Members agreed, that the Secretariat should prepare separate papers to consider in further detail the following areas for the Committee to consider.

i. awareness/competence of Feed Business Operators;
ii. identification of feed businesses; and
iii. imports.

Action: ACAF Secretariat

34. One Member of the Committee suggested that assurance schemes could improve standards and encourage their wider uptake. The Member would raise this suggestion with the Assured Standards Board at a future meeting. The ACAF Secretary thanked the Member for his suggestion. In addition, the ACAF Secretary said that another area that was not covered was 'whistle-blowing'. There was a need to encourage 'whistle-blowing' as this was an extremely useful way that competent authorities could learn about rogue traders.

35. Another Member of the Committee flagged up work being carried out by the AgriSkills Forum. This includes a national pig register which aims to improve the standards of people working with pigs through continuous professional development. It was also noted that the Agricultural Industries Confederation has also been considering improving competence within the feed sector. Finally, the FSA NI official noted work

being carried out by Queen's University Belfast on identifying gaps in the existing controls. He agreed to find out further information on this work for the Committee to consider.

Action: FSANI

Agenda Item 6 – Feed additives update

36. Mrs Stephanie Cossom (ACAF Secretariat) provided Members with an update on significant developments on feed additives. The Committee last received an update on the use of trace element additives to fortify animal feeds at its March 2010 meeting.

37. Mrs Cossom explained that EU Regulation 1831/2003 controls the use of additives in animal nutrition. These are substances, micro-organisms or preparations, other than feed materials or pre-mixtures that are intentionally added to feed or water in order to perform a range of functions. They have technological, sensory, nutritional or zootechnical function. Mrs Cossom said that there had been six recent significant changes which were:

(a) formation of a new additive group for 'mycotoxin binders' under Commission Regulation 386/2009. It was noted that there were no authorised additives in this group, but applications have been submitted;
(b) introduction of Commission Regulation (892/2010 that provides an opinion on the status of certain feed products. These products may show additive, veterinary medicinal or feed material properties;
(c) introduction of guidelines for the distinction between feed materials, feed additives, biocidal products and veterinary medicines. However a product can only be placed within one of the categories;
(d) re-assessment and re-authorisation of feed additives; a requirement under 1831/2003. Applications have been submitted to the Commission and are being considered by EFSA. 1,250 additives are subject to re-assessment and there may be possible changes to conditions of authorisation;
(e) 'orphan additives – Mrs Cossom said that additives that have not been supported with applications for re-authorisation are called 'orphan additives' and will subsequently be withdrawn from the market. Mrs Cossom confirmed that 1,578 additives are expected to be 'orphaned' in the re-authorisation process. These are mainly flavourings which are not frequently used. Mrs Cossom confirmed that companies would have to re-apply for authorisation if an existing one had been revoked; and
(f) EU Register of Feed Additives – Mrs Cossom noted that the EU Register of Feed Additives is now in two separate annexes. Annex I contains a list of authorised feed additives that will be re-assessed and Annex II lists 'orphan additives' to be removed from the Register.

38. Mrs Cossom mentioned that in December 2010 EFSA produced a self-tasked Opinion on the use of feed additives in water. This Opinion was discussed at the March 2011 Standing Committee on the Food Chain and Animal Health (Animal Nutrition Section), where Member States and the Commission agreed to consider the use of additives in water on a case-by-case basis. Applications for re-authorisation that included use in water will be prioritised.

39. Finally, Members were asked for their views on the re-authorisation of any particular feed additives and on the safety of feed additives in water.

Discussion

40. A Member of the Committee asked whether substances with mycotoxin binder functions should be placed in one or more categories. Mrs Cossom said that a substance could not be classed in two separate categories, i.e. as a feed material and as a feed additive. Mrs Cossom confirmed, following a question from another Member of the Committee, whether separate authorisations would be required for each distinct use for a given feed additive.

41. One Member expressed unease about the loss of a number of feed additives and asked how quickly these could be re-authorised if required. Mrs Cossom said it depended on how quickly the company could put together a relevant dossier. In addition, Dr Smith reported that there was an emergency authorisation procedure. This could only be used where animal health or welfare issues existed.

42. It was noted that the re-authorisation process was being undertaken now as the examination used as the basis for assessments under Directive 70/524 were often not on a par with current standards and requirements. Quite a few of the 'orphan additives' had alternatives which were being supported by applications. Dr Smith added that there had been some good work by the feed industry to inform a European consortium of 'orphan additives' where dossiers have not been submitted. One Member of the Committee thought that the process could be exploited. Dr Smith noted this comment adding that difficulties may arise where multiple applications are received for some generic products. Mrs Cossom stated that all additives would be assessed in accordance with safety guidelines set in Regulation 429/2008[7].

43. Members discussed the position on additives in water. During the discussions it was noted that water was not deemed a feed and that specific authorisations would be required where an additive is being used in water. The Committee was of the view that

[7] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:133:0001:0065:EN:PDF

this control was appropriate in many cases so that animals were not exposed to excess levels of particular feed additives (e.g. certain trace element products).

44. Mrs Cossom confirmed that there would be a transitional period for the phasing out of 'orphan' additives.

Agenda Item 7 – Matters arising from the minutes of previous meetings

Presentation on Copper Supplementation in animal feed

45. The ACAF Secretary noted that the copper code of practice was still in draft form. Following comments received on the draft code, the Food Standards Agency had organised a meeting with the authors, stakeholders and some members of ACAF. The aim of the meeting is to discuss and resolve the issues raised. One Member once again raised concerns that in relation to consumer safety, the samples of liver provided as evidence may not be typical of that available at retail and suggested that a small survey of retail liver should be undertaken. The ACAF Chairman added that he wanted to ensure that he was able to identify what the issues were with a view to help finalise the document with everyone's co-operation.

Regulation 767/2009 – Marketing and Use of Feeds: Labelling of additives in feed

46. The ACAF Secretary said that as a result of concerns raised by industry at ACAF's December 2010, meeting about the requirement under Regulation 767/2009 on the marketing and use of feed to declare the added compound rather than the specific element in feeds, he had written to the European Commission to highlight this issue and to suggest an alternative way forward. A response to this letter outlining three options for a way forward had been received from the Commission, which was discussed at the March 2011 meeting. The ACAF Secretary confirmed that a draft response to the European Commission was sent to ACAF Members for comment on 10 March 2011 with the final letter being sent on 7 April 2011.

Annual performance and feedback

47. The ACAF Secretary noted that as requested by Members at its March 2011 meeting, details of the revised procedures for annual performance and feedback had been re-sent to them. The Chairman commented that he had received an appraisal from the Agency's Chief Scientist, under the revised procedures and this had been very constructive.

Agenda Item 8 - Any other business

Recruitment of new Members

48. Miss Jumnoodoo said that plans to recruit three new members (animal nutritionist, toxicologist and a feed manufacturer) were progressing well. A paper sift had taken

place on 19 April 2011 and interviews were to take place on 3 June 2011. Members would be informed of the outcome once Ministers had agreed to the recommendations of the interview panels.

Action: Secretariat

Biofuels paper

49. Miss Jumnoodoo reminded Members that the Secretariat had produced an inter-sessional paper on biofuels (ACAF paper 11/06). Several Members had provided comments on this paper. It was proposed that an update position paper on biofuels would be finalised at the September 2011 ACAF meeting. Members who still wish to submit comments were asked to provide these to the Secretariat by 3 June 2011.

Action: Committee

FVO Audit November 2011

50. Mr Ron Cheesman, noting earlier discussions on the forthcoming FVO audit to the UK, said that the FVO team would be visiting England, Scotland and Wales. A pre-audit questionnaire had been received which identified the number and types of businesses and local authorities to be included in the itinerary. The FSA was currently organising meetings with stakeholders to discuss the handling protocol for this audit. The completed pre-audit questionnaire, including the proposed itinerary, had to be returned to the FVO by 10 October 2011. This visit was a follow-up to the audit that took place in June 2009, but would also look at new developments in feed law and current incidents to see how these had been implemented/dealt with in the UK. Mr Cheesman agreed to provide the Committee with a report of the outcomes of the FVO audit.

Date of the next meeting

51. The ACAF Chairman confirmed that the Committee's next meeting would be held on 28 September 2011. The location of the meeting would be confirmed as the Secretariat was awaiting a decision from FSA senior management on holding a meeting outside London.

Information Papers

52. The ACAF Chairman drew the Committee's attention to the following information papers:

- EU Developments (ACAF/11/11); and
- update on the work of other advisory committees (ACAF/11/12).

ACAF Secretariat
September 2011

Question and Answer Session

Judith Nelson (Agricultural Industries Confederation (AIC) - commenting on the TSE Regulation, said that even if the use of non-ruminant PAP in non-ruminant feed was to be permitted in the future, a major consideration was consumer acceptance of such a measure as well as the fact the some UK livestock assurance schemes currently prohibited the use of legally permitted PAP in feed. Ms Nelson also made two further points:

a) the zero-tolerance of fishmeal in feed for adult ruminants is disproportionate - it is currently impossible for companies to produce ruminant feed on the same line as feed for non-ruminants containing fishmeal; and
b) there is a need for proportionate controls with respect to surplus foods containing ruminant gelatine, as EFSA has advised that the risk of ruminant gelatine causing TSE is negligible.

Dr Helen Raine (ABAgri Ltd) - asked if ACAF had any intention of considering the issue of whether the use of certain medicines in animal feeds is in any way linked to the build up of anti-microbial resistance in animals and humans.

Mrs McDonald (Veterinary Medicines Directorate) agreed to refer this question to colleagues at the VMD who have responsibility for issues related to anti-microbial resistance.

The ACAF Secretary suggested that it would be useful if VMD colleagues could provide a presentation to ACAF on this issue at a future meeting.

Andrew Ball (BAFSAM) - commenting that on the feed additives item, FEFANA (EU Association of Specialty Feed Ingredients and their Mixtures) had produced a classification tool to help operators determine whether a product is an additive or feed material.