IMINUTES OF THE FIFTY-SEVENTH MEETING OF ACAF HELD ON 7 MARCH 2012

Present: Chairman	Dr Ian Brown
Members	Dr Dozie Azubike Ms Angela Booth Mr Barrie Fleming Professor Stephen Forsythe Professor Ian Givens Professor Nigel Halford Mrs Chris McAlinden Ms Diane McCrea Dr David Peers 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
Assessors	Mr Tim Franck – Food Standards Agency Mr Simon Craig – Food Standards Agency, Scotland Mrs Vicki Reilly – Food Standards Agency, Wales Mr Stephen Wyllie - Defra
Officials:	Mrs Janis McDonald - Veterinary Medicines Directorate Mr Gerard Smyth – Food Standards Agency Northern Ireland Mr Stephen Nixon – Department of Agriculture and Rural Development Northern Ireland
Speakers:	Mr Philip Randles – Food Standards Agency Mr Ron Cheesman – Food Standards Agency

1. The Chairman welcomed delegates 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, Professor Ian Givens, Mr Tim Brigstocke and Dr Glenn Kennedy (Northern Ireland Assessor).

Agenda Item 1 – Declaration of Members' Interests

3. 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 Halford confirmed that he was to provide presentations to Almaty University in Kazakhstan and the Devizes Site Festival on plant biotechnology. Mrs McAlinden confirmed that she had been approached by a farmer from Ireland to look at some diet analysis in conjunction with the clinical signs/calf deformities observed in the farmer's cattle. The actual incident took place over 4 years ago.

Agenda Item 2 – Draft Minutes of the Fifty-sixth Meeting (MIN/11/04)

4. The minutes were adopted subject to three minor changes to paragraphs 14, 15, and 17.

Agenda Item 3 – Emerging Risks

5. Mr Philip Randles of the Agency's Chemical Safety Division introduced paper ACAF 12/01 on the work that the Agency was carrying out to identify emerging food safety risks.

6. During his presentation, Mr Randles confirmed that methodologies for the detection of new and re-emerging risks have been developed by the FSA and are now operational. He described how incident data are being routinely compared to statistically defined baselines to identify unusual trends and events that might require intervention. Global chain analysis is being used to identify weaknesses which may lead to potential food safety issues and root cause analysis is being conducted to improve the Agency's understanding of how and why incidents occur.

7. Mechanisms for discussing issues relating to emerging food safety issues have been established and include the Emerging Risks Consultative Forum (ERCF) which provides opportunity for intelligence exchange between senior industry representatives and the Agency.

8. Mr Randles said that work to further develop the IT functionality of the Agency's emerging risks programme by integrating the emerging risks database with those relating to incidents and food fraud in order to produce an intelligence network, had been initiated and would be completed by the end of March 2012. This complementary approach provides the Agency with the potential to identify and respond more quickly to food safety issues thereby creating "Safer Food for the Nation".

Discussion

9. The ACAF Secretary and Mr Randles explained, following a question from a Member of the Committee, that in some cases where products for human consumption are recalled they are not allowed to enter the animal feed chain, because of legal and safety concerns. In response to a question, on when an emerging risk becomes an acute risk, Mr Randles said that the FSA Evaluation Board was made up of members with experience of incident handling. The purpose of the Board was to identify potential issues, on which relevant policy teams are then asked to provide risk assessments. If a significant risk is identified then the Agency's incidents protocol would be instigated.

10. Mr Randles explained that on-farm incidents can include chemical poisoning (e.g. lead, copper, selenium), and botulism. He went on to say that response times to incidents were defined in the Agency's Incidents Protocol. The ACAF Secretary added that the Agency has an Incidents Branch that liaises with policy teams on management of incidents in line with the Agency's Incident's Protocol.

11. Following a request from a Member of the Committee, Mr Randles said that the Agency's definition of an incident was "...any event where, based on the information available, there are concerns about actual or suspected threats to the safety or quality of food that could require intervention to protect consumers' interests." When an outbreak (involving two or more persons or events) is reported to the Agency this constitutes one incident. As a result of better reporting of incidents and increased surveillance, Mr Randles stated that the number of incidents handled by the Agency was increasing. The Agency was improving its understanding of most of the types of incidents reported and the subsequent emerging risks; however, there were areas (e.g. imported foods), where the Agency was encountering difficulties in interpreting the associated risks.

12. In response to a question on whether the Agency employed a different strategy for acute compared to chronic food safety risks, Mr Randles said that the Agency's policy teams consider how to handle the two types of risks. The Strategy Team provides advice to policy teams where reporting of specific incidents are increasing, so that appropriate action can be taken. Mr Randles added that the number of high level incidents observed by the Agency was decreasing. The ACAF Secretary reminded Members that feed business operators had a responsibility under the Feed Hygiene Regulations¹ to report incidents. He added that the UK feed sector had been particularly diligent in this area. Members agreed to provide the Secretariat with information on issues concerning animal feed that the Agency should consider as part of its work in this area.

Action: Committee

¹ Regulation (EC) no 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principals and requirements of food law.

Agenda Item 4 – Feed Safety-potential gaps

13. Mr Tim Franck (ACAF Assessor) introduced paper ACAF/12/02. He said that at the Committee's meeting on 1 June 2011, the Committee considered a paper on possible gaps and weaknesses in controls in the UK feed sector. One of the issues raised was the awareness and competence of people providing advice to farmers on animal feed issues. Mr Franck said that paper ACAF 12/02 covered organisations that are actively providing education/qualifications and support, including the Agricultural Industries Confederation, and the British Society of Animal Science. The paper also included a section that outlined certain conclusions from the recent FVO audit of UK feed law enforcement attributable to shortcomings in the operating procedures of some feed businesses.

14. Mr Franck also informed Members that the Agency is notified (by the European Commission, local authorities, feed businesses and trade associations) of feed safety incidents, and Annex II of paper ACAF 12/02 contained a list of incidents related to a lack of compliance of operators. He invited Members of the Committee to comment on the paper including any further details of organisations that are missing. In addition Members were also invited to comment on the outcome of the FVO audit.

Discussion

15. Members of the Committee were concerned that some advisors providing guidance to farmers did not have any recognised qualifications, and that a register of suitably qualified advisors for the sector did not exist. However, one Member of the Committee said that care was required not to over burden the industry with additional obligations. Another Member suggested that the veterinary profession was also another source of advice for farmers. The Defra Assessor added that agricultural colleagues, ADAS and, VMD also provide advice. One Member pointed out that none of the feed safety incidents identified in the paper appeared attributable to the poor advice from third parties. However, there was concern that ineffective/illegal products may be recommended to farmers by some individuals. Members agreed it would be useful if they could explore this issue further by inviting industry organisations such as the AIC to provide a presentation on work they are carrying out in this area.

Action: Secretariat

Agenda Item 5 – Food and Veterinary Office audit Recommendations

16. Mr Ron Cheesman of the Agency's Enforcement, Liaison and Delivery Division gave the Committee a presentation on the findings of, and the work to address the recommendations of, the Food and Veterinary (FVO) audit of the United Kingdom that took place in November 2011 to evaluate the implementation of official controls on feed. He said that the FVO had published its report of the audit together with the UK comments and its action plan.

As reported at ACAF's 14 December 2011 meeting, the FVO made 12 17. recommendations². Mr Cheesman outlined actions taken and proposed by the Agency in response to the recommendations; these are set out below.

Date	Action
16 February 2012	The Agency held a meeting with industry stakeholders to discuss
	the recommendations specific to FeBOs ³ in relation to HACCP
	and discussed how these can be addressed.
16 February 2012	An invitation for local authorities (LA) to bid for feed sampling
	grants for 2012/13 was issued which takes into account the
	specific recommendation on carry-over of additives into feed for
	non-target species.
20 February 2012	FSA Wales held a meeting with LAs to discuss the FVO
	recommendations - LAs have agreed to draft a point-by-point
	response to the recommendations detailing actions proposed.
27/28 February 2012	Initial revised training took place for LA officers on feed safety
	management systems which took account of the FVO
	recommendations on HACCP. More courses are planned for
	2012.
1 March 2012	A meeting of the National Animal Feed Ports Panel was held to
	discuss the recommendations on import controls and the support
	planned/put in place at points of entry both in 2011/12 and
2 March 2012	2012/13.
2 March 2012	The Agency published its 2012/2013 enforcement priorities for
	LAs pursuant to the findings of the FVO audit. The Agency has
	also set out the direct funding the Agency envisages will be made available during 2012/13 to support official controls.
5 March 2012	FSA Scotland colleagues ran a training day for enforcement
5 Water 2012	officers. Attendees received a presentation which included the
	FVO audit report and recommendations.
13 March 2012	The Agency is to host a meeting of the local authorities National
10 1/10/01/2012	Agriculture Focus Group to discuss the recommendations. This
	Group also includes representation from $DARD^4$ in Northern
	Ireland and will consider the way forward in dealing with the
	recommendations.
28 March 2012	The Animal Feed Law Enforcement Liaison Group is to meet to
	discuss the recommendations and the actions in response.

² See appendix 1
³ Feed business operators
⁴ Department of Agriculture and Rural Development

18. In addition to the above actions, Mr Cheesman said that the Agency, is arranging to attend individual LA regional liaison groups to discuss the recommendations in light of the Agency's enforcement priorities. He invited Mrs McDonald of the Veterinary Medicines Directorate (VMD) to outline actions being taken by the VMD to address the recommendations specific to them.

19. In terms of the UK response to the recommendations Mr Cheesman and Mrs McDonald said the following:

- Recommendation 1 Mr Cheesman explained that this recommendation specifically relates to internal monitoring by individual LAs of their own feed controls and the Agency's Audit Branch will provide guidance for LA managers.
- Recommendation 2 the Agency had shared the advice given to the LAs and will be discussing this with NAP⁵ in particular some visits relating exclusively to hygiene checks need not be announced.
- Recommendation 3 the Agency will be working with LAs to ensure they produce more detailed inspection reports. The Agency will also make more widely available to LAs the Agency inspection report forms which the FVO acknowledged captured the information required.
- Recommendation 4. the Agency continues to press LAs to include a wide range of feed businesses in their programs of official controls via its National Enforcement Priorities which are published annually. The Agency expects to provide direct funding for the inspection of certain feed businesses in line with the national enforcement priorities during 2012/13.
- Recommendation 5 the Agency is to discuss with stakeholders ways that they can provide more information whilst encouraging them through their audit process to check that their suppliers and customers are registered FeBOs.
- Recommendation 6 the Agency has revised its training for local authority officers to ensure better targeting of critical control points in feed management systems. It is also discussing with industry stakeholders how the lessons of the audit can be incorporated into their own audit schemes.
- Recommendation 7 the FVO acknowledged that improvements had been made with controls at points of entry visited during the audit. The Agency is discussing with the NAFPP⁶ the FVO findings and proposals for further funding of import

⁵ National Agricultural Panel (now known as the National Agriculture Focus Group)

⁶ National Animal Feed Ports Panel

controls during 2012/13. The Agency has funded a specific piece of work to support controls at small points of entry.

- Recommendation 8 Mrs McDonald explained that the Veterinary Medicines Directorate was drawing up a notice for industry requesting notification on exports of unauthorised products via Member States and to third countries, which includes confirmation that the third country has given express consent for unauthorised feed additives or veterinary medicines to enter their country.
- Recommendation 9 Mrs McDonald confirmed that work had already started to ensure that VMD informs other Member States that unauthorised substances are to enter their country.
- Recommendation 10 the FVO is aware that the VMD is developing a system to identify banned antibiotic growth promoters. VMD is working on introducing sampling arrangements using the system within the next 12 months.
- Recommendation 11 the Agency is funding work on carryover of coccidiostats. The Agency will be working with LAs and the VMD to ensure that targeted work on this recommendation is carried out during the next 12 months.

Mrs McDonald added that the VMD will require feed business operators to validate their cross-contamination controls to the level of quantification (LOQ) appropriate to the maximum permitted limit for each substance.

• Recommendation 12 - the FVO noted that the UK had made improvements to ensure adherence to Article 6 of EC Regulation 767/2009, the ban on packaging materials in feed, but consider the absence of packaging in feed is not being met. The FVO is aware that the UK is pushing, together with other Member States, for a change in EU legislation to a maximum permitted level of packaging.

Discussion

20. Mrs McDonald and Mr Franck advised Members that unauthorised feed additives are permitted to be exported to a third country. However, the exporter needs to gain confirmation that the third country permits the unauthorised product to enter its country. In addition, if the product is to travel via a Member State then the Member State concerned will need to be advised of this supply route.

21. The ACAF Secretary stated, in relation to Recommendation 12, (on the presence of adventitious packaging in feed produced from recycled human food), that the UK continues to lobby the European Commission to amend the requirement for zero tolerance. It has asked the European Commission to seek a risk assessment from EFSA.

He urged industry organisations to also lobby the Commission for change in the requirements. In addition, the Agency is working with human food recyclers to devise methodology that can be applied across the sector. He agreed to report back to the Committee on developments in this area.

Action: Secretariat

22. On recommendation 11, IIT⁷ inspectors are to start an inspection programme where they would require relevant feed businesses to ensure their cross contamination controls are validated to the level of quantification appropriate to the maximum permitted limit for each coccidiostat. With respect to recommendation 5, it was noted that although LAs have identified most FeBOs it was a challenge to identify all such businesses. Also, a farm may well be registered as a FeBO but not all of the farms activities may be known. However, one Member indicated that the level of checks carried out varied from one LA to another. The LA should identify the activities. In addition, the farmer has an obligation to report any changes in status.

Agenda Item 6 – Report on the Codex Task Force on Animal Feeding

23. Miss Jumnoodoo said that the 6th session of the Task Force on Animal Feeding was held in Bern, Switzerland from 20 to 24 February 2012. It was chaired by Dr Eva Reinhard, Assistant Director of the Swiss Federal Office for Agriculture, Switzerland. The Plenary Session was attended by over 139 delegates representing 43 member countries, 1 member organisation (EU) and 11 international organisations, including Food and Agriculture Organisation, World Health Organisation and the World Organisation for Animal Health (OIE).

24. The Task Force has two mandates:

(a) to develop guidelines, intended for governments on how to apply the existing Codex risk assessment methodologies to the various types of hazards related to contaminants/residues in feed ingredients, including feed additives used in feedingstuffs for food producing animals; and

(b) to develop a prioritised list of hazards in feed ingredients and feed additives for governmental use. The list should contain hazards of international relevance that are reasonably likely to occur, and are thus likely to warrant future attention.

⁷ Inspections & Investigations Team, formerly known as the Animal Medicines Inspectorate (AMI)

25. Miss Jumnoodoo reported that the Task Force had worked well and made many improvements to the texts of the two draft documents, copies of which are available on the Codex Alimentarius website:

http://www.codexalientarius.org/eetings-reports/en/

Discussion

26. Following comments from Members of the Committee, the ACAF Secretary explained that the Task Force had a two year life-span, with the possibility of extension for a further year. The Task Force makes recommendations to the Codex Alimentarius Commission (CAC). The CAC is the decision making body and works on a consensus basis. It aims to protect the health of consumers, ensure fair trade practices in food trade, and promote the co-ordination of all food standards work undertaken by international governmental and non-governmental organisations. Although standards produced by CAC have no legal basis they can be used to help settle trade disputes between countries.

27. The ACAF Secretary agreed to send Members of the Committee the link to papers for the Task Force on Animal Feeding.

Action: Secretariat

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

28. The ACAF Chairman updated Members on the following actions from previous meetings :

Feed Safety – potential gaps

29. At the December 2011 meeting, during discussions on *Feed safety* – *potential gaps*, the Committee agreed with the ACAF Secretary's suggestion that the issue of sharing information between Environmental Health and Trading Standards Departments should be referred to the Animal Feed Law Enforcement Liaison Group (AFLELG) for further consideration. The ACAF Chairman reported that this issue would be discussed at AFLELG's next meeting on 28 March 2012.

Initial feedback from the Food and Veterinary Office audit

30. At the December 2011 meeting, the ACAF Secretary announced that he intended to hold a meeting early in the New Year, with stakeholders, to discuss the findings of the Food and Veterinary Office audit and the way forward. The ACAF Chairman said that the meeting had taken place on 16 February 2012. Additionally, the ACAF Secretary agreed to send Members a copy of the note of this meeting.

Action: Secretariat

Forward Work Programme

31. As agreed at the December 2011 meeting the ACAF Secretariat had amended the Committee's forward work programme following suggestions submitted by Members of the Committee. The final version of the forward work programme was uploaded on to the ACAF website on 5 March 2012.

<u>Update on work carried out by Food and Environment Research Agency (FERA) on food</u> <u>and catering waste</u>

32. The Defra Assessor agreed at the December 2011 meeting, following a request from a Member, to enquire from Defra colleagues whether there had been any results from research being undertaken by FERA on food and catering waste, which was mentioned at ACAF's September 2011 meeting. Members of the Committee were provided with an update on this work on 19 December 2011.

Biofuels position paper

33. As part of its work programme for 2006-2007 the Committee examined the impact of biofuel production on the safety, composition and availability of animal feed. In particular, it reviewed the types of co-products derived from the production of biofuels that have, or may have, a use in animal feeding. The Committee published its position paper on 30 April 2008.

34. At its 3 March 2010 and 3 June 2010 meetings, the Committee received presentations on biofuels. Following these presentations, the Committee agreed that its position paper should be revised and adapted in line with emerging developments. A revised position paper was uploaded on to the ACAF website on 5 March 2012.

Agenda Item 8 - Scientific Advisory Committee Chairs

35. The ACAF Chairman informed Committee Members of the outcome of a meeting hosted by the Government's Chief Scientific Advisor, Professor Sir John Beddington, which he had attended in February 2012 with other scientific advisory committee chairmen.

36. The ACAF Chairman noted that this meeting had been useful and discussed the following issues;

- update on work being carried out by Chief Scientific Advisors;
- transparency and 'Freedom of Information';
- innovation and research strategy; and
- succession planning.

37. The ACAF Chairman also noted that Sir John Beddington would be stepping down from the role at the end of 2012. His post would be advertised shortly.

Agenda Item 9 - Any other business

38. Members of the Committee requested information and updates on the following issues:

Brominated Flame Retardants

39. The Secretariat agreed to find out whether the European Food Safety Authority had issued any further opinions on brominated flame retardants as mentioned at the December 2011 meeting.

Action: Secretariat

Organic Feed

40. Miss Jumnoodoo recalled that at the December 2011 meeting colleagues in Defra referred to the new Regulation that will extend both the 5% non-organic feed derogation for poultry and the derogation for the use of non-organic pullets to 31 December 2014.

41. At the December Standing Committee on Organic Farming (SCOF), the European Commission stated that the 5% non-organic feed derogation will be restricted to non-organic proteins. However, both this derogation and the derogation for non-organic pullets will continue to run until 31 December 2014.

42. Defra expect that Member States will vote on the new Regulation at the next SCOF meeting at the end of March 2012 and that the Regulation should be published shortly after the vote. The Regulation will apply retrospectively from 1 January 2012.

43. The ACAF Secretary agreed to keep Members of the Committee informed of developments.

Action: Secretariat

Question from the Chair of the Veterinary Residues Committee

44. The Secretariat thanked Members of the Committee for their comments following a request from the Chairman of the Veterinary Residues Committee (VRC) for information on farming practices in relation to evidence that the presence of brassicaderived feed materials in animal rations can induce the production on thiouracil *in vivo*.

45. Based on the comments received the Secretariat is preparing a response which will be circulated to ACAF Members prior it being sent to the VRC Chairman.

Antimicrobial resistance

46. Mr Stephen Wyllie (Defra Assessor) said that he would provide the ACAF Secretariat with the terms of reference for Defra's Antimicrobial Resistance Coordination (DARC) Group in response to a question from a Member of the Committee on whether antimicrobial resistance fell within the Committee's remit. Mr Wyllie also agreed to arrange a presentation to be provided by a Member of DARC. In addition, the ACAF Secretary agreed that as this subject was being discussed by the Responsible Use of Medicines in Agriculture (RUMA), he would also arrange for someone from RUMA to provide a presentation on work it was doing on antimicrobial resistance.

Action: Mr Wyllie/ACAF Secretariat

Date of the next meeting

47. The ACAF Chairman stated that the next meeting of ACAF would take place on 15 June 2012 at Queen's University, Belfast.

Information Papers

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

- EU Developments (ACAF/12/03); and
- update on the work of other advisory committees (ACAF/12/04).

ACAF Secretariat May 2012

Question and Answer Session

Paul Featherstone (SugaRich) – commenting on the presentation on the Food and Veterinary Office audit (particularly recommendation 5), asked whether the national register of feed business operators (FeBOs) was available in the public domain.

Mr Cheesman replied that there is a requirement for feed business establishments to be registered under EC Regulation 183/2005. Prior to 2010 the information was held only on a local basis by local authorities. However, since 2010 the responsibility for maintaining and keeping a national list of all feed business establishments had fallen to the Food Standards Agency. The list was publicly available and can be viewed using the link below:

http://www.food.gov.uk/enforcement/sectorrules/feedapprove/feedpremisesregister

Tim Dumenil (Diageo) – asked how many of the incidents mentioned in the presentation on emerging risks were:

- (a) reported by the food/feed industry;
- (b) reported by enforcement agencies; and
- (c) reported by affected people.

Also, if as inferred, a significant number were self-reported by industry, and that 70% of incidents were reoccurring, then it would also be very useful for identified root causes of incidents and emerging issues to be shared across food/feed industries.

The ACAF Secretary agreed to liaise with colleagues within the Food Standards Agency for an answer to Mr Dumenil's question.

Action: Secretariat

Stephen Nixon (DARD) – commenting on the emerging risks presentation, and in particular the number of on-farm incidents reported in the early to mid 2000s, asked if the Committee was considering updating its review of on-farm feeding practices. The ACAF Secretary agreed to canvass Members on whether the document required updating.

Action: Secretariat

Gerard Smyth (FSA Northern Ireland) – thanked the Committee for its decision to hold a meeting in Northern Ireland in June 2012. He explained that the visit planned on the day before the meeting would allow Members to view the work being carried out by Queen's University Institute of Food and Land Use on risk assessments for feed.

Appendix 1

FVO Audit Recommendations (15-25 November 2011)

N°.	Recommendation
1.	To further develop the existing arrangements in place at the level of local authorities to ensure that the verification of effectiveness of official controls on
	feed is performed as required by Article 8(3) of Regulation (EC) No 882/2004.
2.	To ensure, as required by Article 3(2) of Regulation (EC) No 882/2004, that
	official controls on feed are generally carried out without prior notification.
3.	To ensure, as required by Article 9 of Regulation (EC) No 882/2004, that reports
	drafted on official controls on feed contain a description of the control methods
	applied and, where appropriate, the actions that the business operator concerned
	is to take.
4.	To carry out regular official controls in all feed establishments, taking into account the risk criteria referred to in Article 3(1) of Regulation (EC) No 882/2004.
5.	To complete, as required by Article 9 of Regulation (EC) No 183/2005, the
	registration of feed establishments for the activities they carry out, so that the lists
	referred to in Article 19 of the said Regulation reflect their correct activities, in
	particular in the case of farms mixing feed with additives or premixtures other
(than specified additives.
6.	To ensure, where appropriate, that feed establishments comply with the requirements of Annex II to Regulation (EC) No 183/2005, in particular with
	respect to HACCP based procedures, minimisation of cross-contamination and
	monitoring of undesirable substances.
7.	To further develop the implementation of official controls on imported feed in
	order to meet the requirements of Article 16 of Regulation (EC) No 882/2004.
8.	To comply with the provisions of Art. 12 of Regulation (EC) No 178/2002 when
	exporting feed containing banned additives, in particular as regards evidence that
	the use of such feed is allowed in the third countries of destination.
9.	To provide other Member States with administrative assistance such as
	information about dispatched feedingstuffs only allowed for export, as laid down
10	in Article 34 of Regulation (EC) No 882/2004.
10.	To reinforce the official controls which aim at verifying compliance with Article
	11 of Regulation (EC) No 1831/2003 (banned antimicrobial growth promoters) so that they take account of the ricks referred to in Article 2 of Regulation (EC) No
	that they take account of the risks referred to in Article 3 of Regulation (EC) No
11.	882/2004, in particular those associated with feed.To reinforce the organisation of official controls which aim at verifying
11.	compliance with Directive 2002/32/EC (including on maximum permitted levels
	of coccidiostats in non-target feed) so that they take account of the risks referred
	to in Article 3 of Regulation (EC) No 882/2004, in particular those associated
	with feed.
	1

12.	To ensure the absence of food packaging material in feed, as required by Article 6
	of Regulation (EC) No 767/2009.