

DRAFT MINUTES OF THE SIXTY FIRST MEETING OF ACAF HELD ON 8 MAY 2013

Present:

Chairman Dr Ian Brown

Members Dr Dozie Azubike
Ms Angela Booth
Mr Tim Brigstocke
Ms Ann Davison
Mr Barrie Fleming
Professor Stephen Forsythe
Mr Peter Francis
Professor Ian Givens
Professor Nigel Halford
Mrs Chris McAlinden
Dr David Peers
Mr Richard Scales
Mr Edwin Snow

Secretariat Mr Keith Millar (Secretary) – Food Standards Agency
Miss Mandy Jumnoodoo – Food Standards Agency
Dr Ray Smith – Food Standards Agency
Ms Abrar Jaffer – Food Standards Agency
Mr Raj Pal – Food Standards Agency

Assessors Mr Tim Franck – Food Standards Agency
Professor Glenn Kennedy - Agri-Food & Biosciences Institute
Mrs Vicki Reilly – Food Standards Agency, Wales
Ms Karen Robertson – Food Standards Agency, Scotland

Officials Mr Ron Cheesman – Food Standards Agency
Mr Gerard Smyth – Food Standards Agency in Northern Ireland

Speakers: Ms Lana Oliver – Pet Food Manufacturers Association
Ms Liz Colebrook – Mars Petcare UK
Ms Monika Prenner – Nestle Purina

1. The Chairman welcomed delegates to the 61st meeting of ACAF and reminded them that there would be an opportunity to ask questions at the end of the meeting. He said that this was the first time that the Committee meeting had been held in the south west of England.

2. Apologies for absence were received from Mr Stephen Wyllie (Defra Assessor).
3. The Chairman noted this was the last meeting for Dr Azubike, Professor Halford and Mr Scales. He thanked them for their commitment and valuable contributions whilst serving on the Committee.

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. Ms Booth informed the Committee that she had been appointed to the Agricultural Industries Confederation’s Steering Board on EU projects. Professor Givens said he had become a Member of the Aberystwyth University (IBERS) Science and Impact Advisory Board.
5. Professor Halford confirmed he was to provide a presentation at the 21st Conference of the International Plant Growth Substances Association (IPGSA), to be held in Shanghai, China from June 18th to 22nd, 2013.

Agenda Item 2 – Draft Minutes of the Sixtieth Meeting (MIN/13/01)

6. The minutes were adopted, subject to the following changes:
 - paragraph 12 – rearrange the paragraph and bullet points to improve readability.

Agenda Item 3 – Draft Revised Code of Practice on Feed Law (ACAF/13/17 and 13/12)

7. Mr Ron Cheesman of the Food Standards Agency’s Standards Branch introduced paper ACAF 13/12 providing Members with an update on progress of the implementation programme to deliver improvements to current local authority delivery of official controls for animal feed. He explained that at the 16 January 2013 meeting, Members were provided with a presentation from Toni Smith and David Lowe of the Agency’s Review of Delivery of Animal Feed Official Controls Team on the future delivery of feed controls. Members learned that five work streams had been identified from the review. Progress on these work streams included:

- *Interactions with local authorities* - Local authorities were given the opportunity to discuss the five work streams from the review. Four workshops facilitated by the Association of Chief Trading Standards Officers took place in February 2013; the final report of discussions is expected to be published shortly. One of the main messages seems to be that delivery of official controls for feed would be improved by local authorities working together regionally;

- *Earned recognition* - Mr Cheesman noted that the Agency has been considering the introduction of 'Earned Recognition', in particular the benefits for both the feed and food sectors. It appeared feasible that businesses and evidence of good compliance can be factored into the level and type of official controls undertaken by local authorities. The Agency has also looked at industry assurance schemes and ways in which the Agency can assess whether membership of assurance schemes can be used as a basis for earned recognition. Following discussions with several of the main assurance scheme managers, Mr Cheesman stated that the Agency has been working on the criteria for approval and agreeing systems to enable businesses to gain earned recognition;
- *Revision of the Feed Law Code of Practice (Great Britain)* (ACAF paper 13/17) - noted that the revision of the Feed Law Code of Practice is seen as an important step in helping streamline enforcement, help promote regional working, and to introduce earned recognition;
- *Exploring how improved collaborative working with other government departments can bring further intelligence to the Agency* - Mr Cheesman said that the Review Team has been in discussions with a wide range of other government departments concerning the delivery of feed controls and the help departments can receive in terms of exchange of information. Discussions on this area has taken place at the Animal Feed Law Enforcement Liaison Group and useful contacts have been made with the Rural Payments Agency on the exchange of information and checks being undertaken as part of their compliance audits. In addition some useful discussions have taken place around the exchange of information to help enhance controls at feed businesses; and
- *Data and information management improvements* - the Agency believes that improvements to data and intelligence sharing will improve the quality and quantity of local authority annual feed returns. In doing so there will be improvements in the integrity of the premises database and reduce the administrative workload. The Agency will be providing local authorities with practical guidance to assist them in setting up systems.

Discussion

8. Following comments made by Members on the co-ordination and frequency of inspection visits, Mr Cheesman said that information is now in place on how local authorities may co-ordinate inspections. In addition, there are a number of

Memoranda of Understanding (MoU)¹ between the FSA and other government departments. At the March 2013 meeting of the Animal Feed Law Enforcement Liaison Group there was a useful exchange of information between the Food Standards Agency and the Rural Payments Agency and work is continuing to reduce the duplication of inspections.

9. A Member of the Committee was supportive of the work being carried out by the Feed Implementation Team, noting that during feed incidents there had been good collaboration between the feed industry and regulators. The Member was interested to learn about the principles of earned recognition. Mr Cheesman explained that earned recognition was being made available to businesses which were compliant and had a good history of compliance which would result in a lower frequency of inspections. Earned recognition and a reduction in the frequency of inspection would also be available to businesses that satisfy certain criteria including: standards reflecting the relevant feed legislation, appropriate independent audits of membership and transparency of information exchange with the FSA. Following a question from the ACAF Chairman on how businesses will be measured for earned recognition, Mr Cheesman explained how the risk scoring system worked. The Code of Practice will contain the framework on which local authorities can make a decision on the risk rating for a business, and will publish lists of those assurance schemes to which earned recognition applies.
10. A Member of the Committee noted that some primary producers may not be aware of the work the Food Standards Agency and local authorities were undertaking in respect of earned recognition. Additionally, the Member noted that earned recognition for farms was also applied by Defra for certain legislation for which it was responsible. The ACAF Secretary confirmed that he had been chairing meetings with the main representatives of the feed sector, including the NFU. During discussions with the NFU it was agreed that the cascade of information needed to go wider and that the Food Standards Agency should address this point.
11. The ACAF Secretary asked whether the Food and Veterinary Office were content that work being undertaken addressed its recommendations on feed enforcement from previous audits to Great Britain. Mr Cheesman said that in January 2013, the Food Standards Agency provided the FVO with an update on the work being undertaken and were content with the proposed improvements. A Feed Hygiene Working Group is due to meet in the week commencing 13 May 2013, where the UK delegation will outline work being undertaken on earned recognition. Mr Cheesman also reported that in July 2013 there will be a public consultation on the Feed Code of Practice.

¹ The purpose of the MoU is to facilitate closer co-operation between feed law regulators and enforcers in the UK. It also aims to promote better coordination and consistency in feed law enforcement between enforcement and regulatory bodies.

12. A Member of the Committee was uncertain that the proposed levels of inspections carried out by local authorities were adequate and how other inspection authorities would integrate with the Food Standards Agency. Mr Cheesman confirmed that implementation of earned recognition would only occur where exchange of information by assurance schemes was in place. The Food Standards Agency is also holding discussions with other inspection authorities on sharing information. Mr Cheesman stated that earned recognition related to the frequency of inspections and that this did not affect sampling visits. Members of the Committee asked whether there was scope for feed for non-food producing animals to be included; and whether there was any focus on identifying feed business establishments which did not currently appear on local authority registers. One Member of the Committee said that resources should be directed to where risks existed. In the case of non-food producing animals, Mr Cheesman said that the Feed Implementation Team and local authorities were discussing how to make the registers more complete and were trying to obtain a full list of feed businesses from other bodies, including other government departments. The FSA Assessor also confirmed that there is a requirement for all feed businesses to be registered under the Feed Hygiene Regulations².
13. The ACAF Secretary confirmed that a further update on the work undertaken by the Feed Implementation Team would be provided to the Committee at future meetings. Additionally, members of the Committee agreed to provide the ACAF Secretariat with any comments they had on the revised draft Code of Practice on Feed Law.

Action: Committee

Agenda Item 4 – Feed Safety – potential gaps – Conclusions (ACAF/13/13)

14. Mr Tim Franck (ACAF Assessor) said that the Committee began its consideration of assessing possible gaps in the feed chain in 2011. This was principally after the German dioxin incident where significant amounts of feed and food were withdrawn in Germany and other countries, including some foods in the United Kingdom. This followed other major incidents in Belgium and Ireland. The Agency sought the Committee's advice in identifying possible gaps or weaknesses in legislation, enforcement, standards and the practices of feed businesses in order to prevent similar incidences occurring in the United Kingdom.
15. As from June 2011 the Committee has received a series of papers starting with a scoping paper which set out potential areas where weaknesses in official controls or

² Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 September 2003 laying down requirements for feed hygiene

standards may exist. Members asked for additional information on areas which the Committee thought worthy of additional investigation. These were: i) the identification of feed businesses; ii) the awareness/competence of feed business operators; and (iii) imports. Over the preceding eighteen months the Committee discussed separate papers on these three areas. In addition, the Committee was also interested in schemes regarding the provision of advice to farmers on feed matters. It subsequently received papers and presentations on two such schemes during its investigation. Mr Franck stated that the Committee had received information on the Food and Veterinary Office (FVO) audit of UK feed law enforcement that took place in 2011 and steps being undertaken by the Agency to address shortcomings identified by the FVO. In addition, the Committee received a presentation from Agency officials on the review of delivery of official controls and the Agency's plan to strengthen feed law enforcement.

16. Mr Franck explained that he had attempted to summarise the work carried out by the Committee in paper ACAF/13/13. The paper provides a summary of information provided to the Committee, the issues identified by the Committee, the gaps and weaknesses mainly identified during discussions, and a record of work being put in hand by the Agency, local authorities and the feed industry to address shortcomings. Mr Franck said that the paper showed that the Committee had identified a range of possible weaknesses, and areas where improvements could be made, many of which are reflected by the FVO audits and the Agency's review of feed law enforcement. He asked the Committee to consider whether the paper was a fair and accurate summary of the results of its consideration and discussion, and whether there were any further gaps, weaknesses or shortcomings that should be included. In addition, he mentioned that no attempt had been made to include a hierarchy of risks identified; however, this could be considered.

Discussion

17. The ACAF Chairman thanked Mr Franck for providing an accurate summary of the Committee's discussions. He asked Members to consider whether there was a need to rank the risks and whether any further gaps were missing. One Member of the Committee (commenting on the second bullet point in paragraph 12 of the paper) noted that farmers complete a form which includes a question on whether the farm produces animal feed. The Member also asked for clarification on the meaning of the last bullet point in paragraph 12. Mr Franck explained that the last bullet was to identify those premises that had not received, or were not eligible for, grants and thus may not be known to local authorities. Another Member of the Committee said that not all farms were assigned a CPH number³. A Member of the Committee

³ CPH stands for COUNTY PARISH HOLDING and is a number issued by DEFRA that enables them to trace the movement of livestock, pigs, cows, sheep, goats, throughout the country. It is to help prevent the

asked how intelligence sharing is achieved between authorities responsible for food and those for feed enforcement – this is to help ensure that food businesses putting material on the market for feed use are identified. Mr Cheesman said that under the current Code of Practice on Feed Law there is an obligation for Environmental Health Officers to inform Trading Standards Officers where a food business also has feed interests. Mr Cheesman pointed out that the next iteration of the Food Law code of Practice will include a revised registration form for food businesses which invited them to indicate if they supplied any material for feed use. In addition, there will be an emphasis on greater communication between authorities.

18. A Member of the Committee noted that the British Society of Animal Science (BSAS) does not require registration, but focuses on existing BSAS Members. Another Member of the Committee confirmed that this was also true for the Scheme run by the Agricultural Industries Confederation (AIC).
19. The ACAF Chairman asked if the Food Standards Agency carried out an analysis of the range of government cross-cutting activities in relation to the feed and food chain. The ACAF Secretary said that resources were not available to carry out such an analysis. However, the Food Standards Agency monitored for emerging risks. One Member of the Committee suggested that scanning of emerging risks should be carried out in a holistic way. The ACAF Secretary stated that the Agency's Animal Feed and Animal By-products Branch (AFAB) brought items to the Committee for its consideration, and that issues were also discussed at the annual stakeholder meeting hosted by AFAB. Following a comment from a Member, the ACAF Secretary said that issues on genetic modification (GM) were primarily for the Advisory Committee on Novel Foods and Processes. However, ACAF would discuss relevant issues on GM at a future meeting.
20. One Member suggested that if the ACAF wished to rank the gaps and issues, then imports and the registration schemes run by the BSAS and AIC were the most important issues. The ACAF Secretary asked the consumer representative for her views on issues of concern to consumers. The Member said that main areas of concern to consumers were predominantly safety and ethical concerns such as animal welfare and the environment.
21. The ACAF Chairman asked the FSA Assessor to amend the paper in light of the Committee's discussions. The ACAF Secretary suggested that any gaps not covered in the paper which emerged at a later stage could be discussed at future ACAF meetings.

Action: FSA Assessor

spread of disease and is required by law. To obtain a CPH Number you must ring the Rural Payments Agency (RPA) Customer Service Centre on 0845 603 7777

Agenda Item 5 – Update on Antimicrobial Resistance – work proposed by the Advisory Committee on Microbiological Safety of Food

22. Professor Stephen Forsythe informed Members that the ACAF Secretary, a Member of the ACAF Secretariat and himself had attended the seventy ninth meeting of the Advisory Committee on the Microbiological Safety of Food (ACMSF) on 31 January 2013. The ACMSF discussed two items on antimicrobial resistance:

- an update on developments and emerging issues in relation to antimicrobial resistance to which the ACMSF were asked whether to consider this issue in more detail; and
- the proposal that the Veterinary Medicines Directorate had been asked to give a presentation on antimicrobial resistance.

23. Professor Forsythe was asked by ACMSF Members to explain ACAF's interest in antimicrobial resistance. He explained that although antimicrobial agents were not used as growth promoters in animal feed in the EU, medicated feed containing antibiotics was still permissible on prescription and therefore there was still an overlap of interests between the two Committees. In addition, the matter was of public concern and is widely discussed in the media. After open discussion it was decided that the ACMSF did still wish to consider the issue in more detail, and that a sub-group of members from the ACMSF would be established should form which would include Professor Forsythe representing ACAF.

24. Professor Forsythe said that he had not received any further communications on this topic since ACMSF's January 2013 meeting. ACMSF is due to meet again on 27 June 2013. He added that in preparing for the future ACMSF subgroup meeting, he was drawing up a list of related animal feed issues which he could present. He requested help from other ACAF Members in compiling this list.

Discussion

25. Professor Forsythe quoted from a statement from Dr Hilde Kruse (Programme Manager Food Safety, WHO Regional Office for Europe) which said that 'Resistance in the foodborne zoonotic bacteria Salmonella and Campylobacter is clearly linked to antibiotic use in animals used for food, and foodborne diseases caused by such resistant bacteria are well documented in people'. This prompted one Member of the Committee to ask whether the statement was evidence-based. Professor Forsythe said that the European Food Safety Authority's Biohazards Panel supported a more indirect route by poultry through vertical transmission within the poultry production pyramid and re-circulation. The ACAF Chairman added that he had attended a conference in October 2012⁴, which concluded that there was little

⁴ the Royal College of Physicians/Veterinary Surgeons joint seminar on antibiotics.

evidence to support the views of EFSA on antimicrobial resistance. Another Member of the Committee stated that antibiotic use in feed is strictly controlled and that antibiotics were not used as prophylactics. The ACAF Chairman noted that in some parts of the world antimicrobials were used to promote growth. A Member of the Committee said that the European Union was unique in the way it uses antimicrobial products i.e. the products are used for therapeutic reasons only and not as in other third countries for performance enhancement or growth promotion purposes. Additionally, legislative controls within the EU are more effective than in other third countries due to auditing and public scrutiny.

26. A Member of the Committee suggested that the Committee should monitor developments and work with other committees such as the Veterinary Residues Committee and Defra's Antimicrobial Resistance Committee. Antimicrobial resistance is an important issue for consumers and a Member stated that ACAF should consider statements made by EFSA at future meetings. Consumers should have confidence in the work of EFSA and that further research was required. Another Member of the Committee was not convinced that the use of medicated feeds contributed significantly to the increase of antibiotic resistance in bacteria.
27. The ACAF Secretary acknowledged the points that Members made on EFSA and said that ACAF could challenge EFSA on whether it had considered all the available evidence when expressing its opinion. Professor Forsythe said that during its discussions, the ACMSF had highlighted animal feedingstuffs as a potential contributor to antimicrobial resistance. A Member of the Committee stated that the Veterinary Medicines Directorate may have data on the contribution of animal feed to antimicrobial resistance. The Northern Ireland Assessor asked whether the Commission was proposing to introduce legislation to regulate antibiotic carry-over in medicated feedingstuffs (to align with existing legislation concerning coccidiostats), and at what stage were the negotiations. A Member of the Committee reminded Members that the Veterinary Medicines Directorate had provided a presentation to ACAF on the revised legislation.
28. Members agreed to provide information to Professor Forsythe on antimicrobial resistance and animal feed which he can pass onto the ACMSF. Professor Forsythe agreed to report on the ACMSF discussions at a future ACAF meeting.

Action: ACAF Members/Professor Forsythe

Agenda Item 6 – Pet Food Issues (ACAF/13/14)

29. Ms Lana Oliver of the Pet Food Manufacturers Association (PFMA) said that the PFMA is the principal trade body representing the interests of the UK pet food manufacturers. The Association was established in 1970 and now has over 70

members, accounting for 90-95% of the UK manufacturers. PFMA members mainly manufacture cat and dog food, but also food for smaller animals, horses and in 2012 the membership was extended to include wild bird food. Also included in the PFMA membership are ingredient suppliers, i.e. those who produce additives, premixtures and animal based raw materials. PFMA works alongside Government departments as well as many academics from the veterinary and pet nutrition world. PFMA is a member of FEDIAF (the European pet food association).

30. Every year PFMA commissions a market data report. A third party collects market data from PFMA members and collates this to provide information on the volume and value of pet food manufactured in the UK, which has been increasing year on year. PFMA also collects pet population data, which estimates that there are around 8 million cats and 8 million dogs in the UK. 1 in 2 households own one or more pets. The latest data also suggest that pets, when including indoor and outdoor fish, outnumber people; the human population of the UK is approximately 63 million, whilst, the total number of pets stands at 67 million.
31. Ms Oliver explained that pets are defined in the legislation as “any non-food producing animal belonging to any species, fed, bred or kept, but not normally used for human consumption in the Community” and that there are over fifty pieces of legislation governing the manufacture of pet food. The main pieces of legislation cover:
 - animal by-products; and
 - feed hygiene, marketing, additives and undesirable substances, PARNUTS⁵, feed materials, GMOs⁶ and TSEs⁷.
32. Members were informed that the legislation encourages the provision of industry codes and guides which are intended to be practical guidelines for manufacturers to help them comply with the legislation. FEDIAF has produced codes on good manufacturing practice; nutrition for cats and dogs (nutrition for rabbits is in the process of adoption); and good labelling practice. The most recent code is the Code of Good Labelling Practice for Pet Food which can be accessed via the Official Journal of the European Union and the PFMA website.

http://www.pfma.org.uk/_assets/images/general/file/Final%20Code%20of%20Good%20Labelling%20Practice%20Oct%202011.pdf

33. One of the main issues that the pet food sector is facing is in the area of the re-evaluation and authorisation of additives. Ms Liz Colebrook (Mars Petcare)

⁵ PARNUTS - Feeds for Particular Nutritional Use

⁶ GMOs – Genetically Modified Organisms

⁷ TSE - Transmissible spongiform encephalopathies

explained that before each additive can be re-authorised, the European Food Safety Authority (EFSA) is asked for an opinion. The industry is concerned that EFSA is publishing opinions on additives and recommending maximum limits based solely on current usage levels (as identified in dossiers) and not based on safety information. Many additives could thus be re-authorised with legal maximum limits that: i) are too low to meet the nutritional requirements of some species; ii) affect existing safe, nutritionally balanced products; iii) would hamper future innovation; and iv) would increase the labelling burden on industry with no apparent benefit to the consumer.

34. This is of serious concern to general animal health and a fundamental flaw to current EFSA recommendations. In addition, some authorisations that were formally generic could become company/production method specific, which was not intended by the legislation. Potentially this could lead to:
 - increase in price;
 - reduced supply;
 - market regulation through legislation; and
 - numerous applications for the same additive (with slightly different specifications).
35. Ms Colebrook stated that guidance on the requirements for applications for pet food additives, (new and re-authorised), detailing requirements for animal testing on cats and dogs instead of using data from laboratory or farm animals had been produced. EFSA had refused a request (from FEDIAF) to modify these requirements in order to delete animal testing and to permit the use of data from other animals in all cases. EFSA stated that the guidance only further clarified the requirements of Regulation (EC) No. 429/2008⁸ and did not make additions. Members of PFMA fully support the request made by FEDIAF in order to prevent unfair treatment of animals. If EFSA were to progress, innovation would be affected in the UK as animal testing is strongly opposed. This also goes against the principle of the three R's in EU legislation – to Replace, Reduce and Refine the use of animals including protection of animals used for scientific purposes.
36. Additionally, some transitional periods for labelling changes had been set for only six months which was totally impractical for the pet food industry. The pet food industry has proposed lengthier transitional periods of four years for labelling. FEDIAF has already sent such a request to the Commission (DG SANCO). Ms Colebrook explained that the time taken to change a label is on average 6-14 months; that approximately 85,000 labels across Europe would need to be changed;

⁸ on detailed rules for the implementation of Regulation (EC) No 1831/2003 of the European Parliament and of the Council as regards the preparation and the presentation of applications and the assessment and the authorisation of feed additives

and that large stocks of existing labels would need to be used up or they would go to waste. Label waste would not only be costly to the industry but have a very negative impact on the environment. Changing labels is also very costly; therefore continuous, repetitive work should be avoided when unnecessary.

37. The pet food industry believes that continually changing labels will only confuse the consumer in that they will see a new label on products they already buy – and often assume there has been a change in composition; and they may also find the same products with a number of different labels on the shelf together leading to confusion as to whether they are all the same. This goes against the principles for labelling and presentation laid down in Regulation 767/2009 Article 11 paragraph 1, i.e. ‘the labelling and the presentation of feed shall not mislead the user’, and also against the overall principles of the legislation, one of the aims of which was to increase transparency for consumers.

Discussion

38. Dr Smith (ACAF Secretariat) said that EFSA provides scientific advice as published scientific opinions. Issues that the pet food industry had raised are being considered by the European Commission in its proposals on feed labelling. Ms Colebrook noted that on one or two occasions EFSA has overlooked some of the scientific evidence. The ACAF Chairman confirmed that the Committee sympathised with the pet food industry. During the negotiations on the Marketing and Use of Feed Regulation there were opportunities for the pet food industry to provide comments. One Member of the Committee commented that pet owners are concerned with allergies and that the labelling on pet food had to be clear on main triggers. Another Member of the Committee thought it illogical and impractical for pet food manufacturers to have to keep changing their labels.
39. Following a question from a Member of the Committee on what information the PFMA had provided on safety, Ms Colebrook said that information had been provided on an individual basis on request. In response to a question from the ACAF Chairman on whether energy levels are declared on labels, Ms Colebrook said this was a voluntary matter. The PFMA had done a lot of work to help people monitor weight sizes in their pets. One Member of the Committee asked whether the issues on labelling could be put to the National Agricultural Panel, who may be able to provide advice on what should be placed on a label.
40. On the issue of the use by EFSA to seek more animal studies rather than consider existing data, Ms Monika Prenner (Nestle Purina) confirmed that no reasonable explanation was provided by EFSA. Dr Smith suggested that it would be useful if ACAF and EFSA could discuss this issue. The Committee agreed to a suggestion by the ACAF Secretary that it would be appropriate if secretariats of relevant EFSA

Panels were invited to provide ACAF with presentations on an overview of topical livestock, pet food and equine issues at a future meeting.

Action: ACAF Secretariat

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

Balance of Competence Review

41. The ACAF Chairman said that at the ACAF meeting on 16 January 2013 the Committee had agreed to provide the ACAF Secretariat with their contributions, which will form a formal response to the ‘call for evidence’. He thanked Members for providing information which was used in a formal response to the Balance of Competences Review team on 27 February 2013.

Agenda Item 8 – Any Other Business

Visit to Grimsby

42. The ACAF Chairman stated that he, the ACAF Secretary, a member of the ACAF Secretariat had visited a fishmeal and fish processing plant in Grimsby. He was impressed with the processes he saw, noting that the plant was extremely sustainable as nothing was wasted.

General Advisory Committee on Science (GACS)

43. The ACAF Chairman, noting discussions held on the evening prior to the GACS meeting on 21 March 2013, said that although not a food safety issue, GACS Members had commented that the Food Standards Agency (FSA) had handled the horsemeat incident extremely well. In particular, GACS Members were pleased that the framework for sharing data (developed by GACS) had been useful in helping the FSA agree its approach to sharing industry test data. There was also discussion on whether there should be any numerical tolerance in the contaminating species of meat and the ACAF chairman informed Members that there would probably be a tolerance set.
44. The ACAF Chairman added that the GACS Working Group on Science Communication and Engagement found that the Food Standards Agency handled science communication well and the working group’s results had been published.

ACAF Appointments

45. The ACAF Secretary confirmed that interviews had taken place to replace the outgoing Novel Biotechnologist, Enforcement Member and Lay Person. The new Members will be appointed before the next ACAF meeting in October 2013.

Date of the next meeting

46. The ACAF Chairman said that the next meeting of ACAF would take place on 9 October 2013 in Aviation House.

Information Papers

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

- EU Developments (ACAF/13/15);
- Update on the work of other advisory committees (ACAF/13/16);

ACAF Secretariat
June 2013

Question and Answer Session

Rosanna Mann (Food Standards Agency) – thanked the Committee for the opportunity to attend the open meeting. In relation to Agenda item 4, Feed Safety – potential gaps conclusions, Ms Mann said that the Social Science Research Unit would be happy to assist ACAF in thinking about researching and engaging with consumers.

Alexander Doring (FEFAC) – referring to the Committee's discussions on feed safety potential gaps, the update on the review of law enforcement and earned recognition, stated that there were a number of assurance schemes in operation throughout Europe. It was FEFAC's intention to make a list of criteria for these schemes and would welcome the views of the Committee.

Christine Paine (Veterinary Medicines Directorate) – in relation to antimicrobial resistance, said that all feed manufacturers which produce medicated feeds using medicines (VMP) or Specified Feed Additives (SFA) must be approved by the Veterinary Medicines Directorate (VMD) and are subject to regular inspections to ensure compliance. The VMD would know about all manufacturers who supply medicated feed for sale and the majority of premises that manufacture for their own use. Some of the latter may come to light as part of other inspection activities.

All feed manufacturers, whether commercial or for 'own use', must be approved by the VMD to incorporate antibiotics, coccidiostats, anthelmintics or prescription level copper within that feed. Generally, only a small proportion of feed produced by a manufacturer would be medicated and the VMD would be happy to provide factual information for Professor Forsythe. Where a veterinary medicine is licensed as an oral medication (rather than a premix or premixture), then a manufacturer does not need to be approved by the VMD.

Barrie Fleming stated that no prophylactic medication was undertaken 'on farm', Ms Paine asked him to clarify his definition of 'prophylactic' as, although she recognised that in general she had found reducing levels of 'in feed' medication, there is still some that she would consider prophylactic, as she understood the term.

Ben Ellis (NFU) - in relation to Agenda item 4 Feed Safety – potential gaps conclusions, said that the NFU was generally supportive of proposals to take greater account of 'earned recognition' for inspection requirements. Any inspection criteria should take into account that there are well managed farms which are not part of a formalised assurance scheme. Whilst the NFU is supportive

of targeted inspection; inspection standards should remain in order to protect the industry from damaging feed incidents.

The NFU will publicise information on feed business registration and FSA farmer guidance documents through its website and newsletters.

DRAFT