



General News

Season's Greeting



Thank you for all your input and support in 2018

IGFA Feed Committee Meeting



IGFA feed committee meeting took place on the 11th December 2018. The meeting was eloquently chaired by the new chairman Dr John Coleman ADM.

At the beginning of the meeting the new president John Bergin provided an update on the Dinner. The Committee welcomed Ms Jane Dempsey DAFM to the meeting in order to update members on Brexit. However, given the difficulties of the negotiation process Ms Dempsey was unable to discuss in detail the final situation. Other topics discussed at the meeting are included in this edition of the Feed Issues.

Brexit Update



Given the continued uncertainty in the UK surrounding the ratification of the Withdrawal Agreement (WA), as agreed between the EU and the UK on 25

November 2018 – and last week's call by the European Council (Article 50) to intensify preparedness work at all levels and for all outcomes – the European Commission on the 19th December (100 days before the exit day) started implementing its **“no-deal” Contingency Action Plan**. This delivers on the Commission's commitment to adopt all necessary “no-deal” proposals by the end of the year. IGFA encourage all members to read this document see [link](#). This is a unilateral arrangement.

The Irish Government has unveiled further contingency plans to cope with a potential no-deal Brexit, identifying affected sectors that would require emergency legislation. The plan aims to tackle how Ireland would handle a no-deal scenario where the UK would be **“a third country”** outside the European Union from March 2019 see [link](#) or use <http://www.merrionstreet.ie!/MFLV61>

At this point the Feed Trade is encouraged to examine just in time contracts, to ensure the products being imported / exported are correctly coded for customs declarations, and to check the Taric website for the relevant Tariff levels. Intertrade Ireland Enterprise Ireland and Bord Bia all have extra funding to help industry. Revenue has a dedicated website and DAFM will release information on their website in due course. The UK government has so far not issued a requirement for export certificates for compound feed between the EU and the UK. At the committee meeting DAFM encouraged igfa members to put their question directly to the Brexit team or to the association in order to build a Q& A that may assist everyone over the coming time period.

Brexit Assistance: some important links

[Intertrade Ireland Brexit advisory service](#)

[Intertrade Ireland start to plan vouchers](#)

[Be prepared grant](#)

[Full List of EI preparedness Grants](#)

[Tariff Checker](#)

[Uk Partnership Pack: Preparing for a hard Brexit and what to expect at the UK Border](#)

[Customs Training \(export focused\)](#).

Please let deirdre.webb@eorna.ie know if you are interested in **IMPORT** training and I will request a **specific training session**

Sustainability: What about our Supply Chain?

The feed industry has been involved with developing sustainable supplies of key feed ingredients to various sectors over the past few years.



Sustainability is important for the future of soy. Currently apart from the FEFAC standards map showing the number of certified schemes working towards sustainable soy there is no overview of the current status of sustainable soy markets. [IDH](#) has been asked to complete a survey of the volume of Sustainable soy entering the EU market place in 2016 & 2017. IGFA importer members will be circulated with the Spreadsheet and letter.

IGFA clarified for members at the recent Feed Committee meeting that questions from the food trade were increasing. IGFA directs these queries to the FEFAC standards map see [link](#), and asks the food industry to develop purchasing strategies based on the standard map in order to pull volume through the system. The food industry is also directed back to the importers of soy in order to discuss the cost and practicalities of sourcing certificates for their upstream customers.



IGAS ([Irish Grain Assurance Scheme](#)), having been benchmarked against the SAI standard, IGAS currently holds a silver status. In order to achieve the silver status some changes to the Code

of Practice and some questions were added. Many thanks to the grain businesses who supported this work.

Inter-Agency Fodder Committee

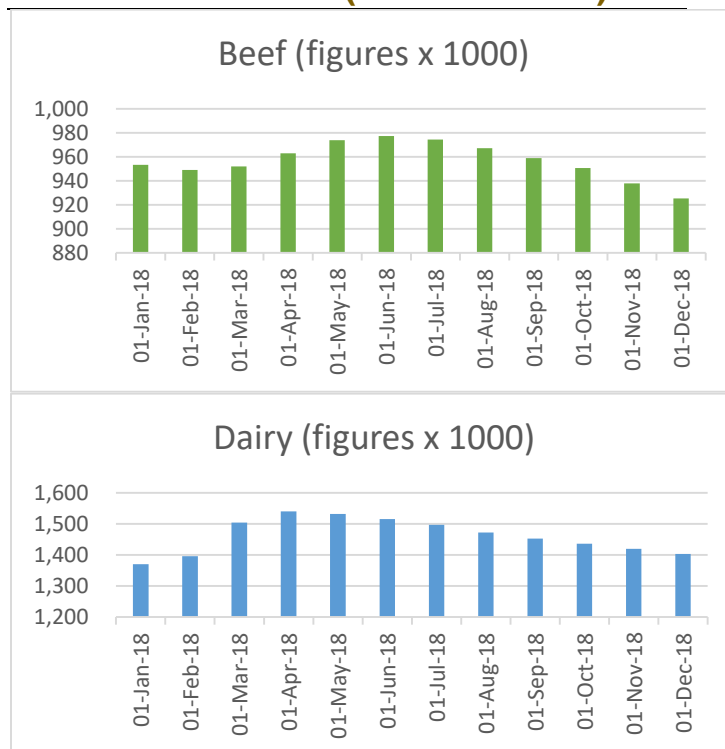


The Inter-Agency Fodder Committee was set up at the behest of Minister Michael Creed where he asked Teagasc to co-ordinate the re-building of national fodder stocks. IGFA sits on this committee.

It was agreed at the Dec. Feed Committee meeting that the IGFA conference calls, have been beneficial and helped members focus on the continued need for budgeting and milk recording, with farmers. It was agreed to continue with the IGFA call as problems still remained on the ground with storage capacity and the

need to hold extra stock because of Brexit and fodder shortages in key areas.

ICB Cow numbers (Jan-Nov 2018)



For more details see [link](#)

Igfa Annual Dinner

The Irish Grain and Feed Association 46TH Annual Dinner will take place on Thursday 31st January 2019 at 7.00 for 7.30 pm In The Crowne Plaza Dublin Airport Hotel, Northwood Park, Santry, Dublin 9, See [link](#) for booking procedure and booking form [link](#)

(Book your accommodation directly with Hotel)
The Crowne Plaza, Airport: €130.50/€141 per room including Full Irish Breakfast
Express By Holiday Inn: €99 per room including Hot Breakfast

Dates

Teagasc	January events see link
Jan 24 th	5 th iNAP Animal Health Implementation
Jan 31 st	Igfa Annual Feed Dinner

Consultations/ Websites

<https://www.agriculture.gov.ie/amr/>
<https://www.animalhealthurope.eu/newsletterdecember18/>
[EU Crop Monitoring and Yield Forecasts bulletin](#)
[Commodity Price Dashboard](#)
[DAFM Trader Notices](#)
[DAFM Registered & Approved FBO's](#)
[DAFM FBO Forms](#)
[DAFM Meat Market Weekly Figures.](#)

Aflatoxin update on GMP testing

As a result of the evaluation of the available analysis results of Aflatoxin B1 in maize GMP+ International, together with other accepted scheme owners, has adjusted the risk profile for Aflatoxin B1.

Changed Risk Profiles:

(effective since 17th December)

Hungary – reduced from medium to low
 Romania – reduced from high to medium
 Ukraine – reduced from medium to low

This means that maize originating from : Hungary, Romania, and Ukraine may be analyzed less frequently. For more information see [link](#)

RASFF Summary 1st 28th Dec 2018

Total	261	<i>Feed Premixtures</i>	0
		<i>Feed additives</i>	0
Food	230	<i>Feed material</i>	16
		<i>Fats and Oils</i>	0
Food contact materials	11	<i>Compound Feed</i>	1
		<i>Herbs & Spices</i>	0
Feed Total	20	<i>Pet food</i>	3
		<i>Nuts, nut products and seeds</i>	0

1st Jan to 28th Dec 2018 there were 2 Feed RASFF notified by Ireland

15th May: Animal protein (particles of terrestrial animals) in monocalcium phosphate from Ireland
(Notification details - 2018.1336)

5th Nov: Salmonella enterica ser. Typhimurium (presence /25g) in rapeseed meal from unknown origin
(Notification details - 2018.3139)

Technical News

Pesticides



Background: Regulation EC 1107/2009 introduced **hazard-based** criteria related to human health for the approval of active substances used in plant protection

products (PPP). Once a substance is classified A1 or B1 under one of the following hazards, Carcinogenic, Mutagenic, toxic to Reproduction (CRM) or contain endocrine disrupting properties (ED), it cannot **in principle** be approved or reauthorized.

ED criteria apply as of November 2019 and no derogation has been provided to allow PPP containing substances with ED properties to be assessed based on risk/exposure levels. No other trading block has a hazard based system such as this.

Active substances falling under CRM or containing ED properties cannot be authorised unless a specific derogation applies. **This sets us up for a complete misalignment of approval for PPP with third country trading blocks**

MRLs and trading limits.

Regulation 396/2005 sets out rules for setting MRLs in food and feed. These MRLs apply to domestic and imported food and feed. It is also possible to set Import Tolerances on request of a third country provided the safety data is available. When an active substance is not approved under Regulation 1109/2009 MRLs and Import Tolerances are automatically revoked and revert to LOD. This may give rise to restrictions of trade for third countries and it is unclear as to how Import tolerances or MRLs for cut off criteria substances could be handled. EU farmers have pointed out that imported food or feed may contain traces (MRLs) for products that they have no access to.

Once an active substance is denied reauthorisation based on hazard cut off,

OR

a dossier is allowed to lapse the corresponding import tolerance and MRLs are also revoked.

Requests for Import Tolerances (IT) for imports from 3rd countries will be dealt with under the procedures set down in 396/2005. This involves a peer review of the data by a member state (rapporteur) followed by an EFSA opinion. In addition, other **legitimate factors** may be taken into account along with the precautionary principle. In light of what we know about GMO authorisations and the inclusion of **other factors** and the precautionary principle in these approvals the system of granting IT to third country importers may not be straightforward.

It is however evident that, the basis of using "a cut off", based on risk as a basis for authorising pesticides will be very problematic. Applying for an import tolerance (IT) for an active substance, that has been refused authorisation in the EU may also be challenging. It may be that EU farmers object to an IT, as they will not have

access to these pesticides. Igfa members are reminded that maximum residue levels (MRL) are an indication that the farmer has applied good agricultural practise and some safety elements are taken into account. Furthermore, the ambiguity around the interpretation of the the foot note in 396/2005 across EU member states could mean that one country may stop a cargo and want to perform a risk assessment, while another may accept the cargo was destined for feed, therefore no MRL applies (until they are set by the Commission) as per the foot note. The concern for importers is the uncertainty and legal ambiguity. Third country suppliers will be reluctant to apply for IT in a system that is not based on hazard. As we have seen on GM, there are plenty of other buyers and these non-EU regions hold more buying power than the EU. At Brussels levels the Feed associations are continuing to hold information workshops with regulators and third country representatives (US soy bean trade) in order to educate stakeholders on the issue.

Medicated Feed and AMR

After four years of intense negotiation, the new Regulation should be published early 2019, final implementation date of 2022 (3yrs). The main achievement of the new EU legislations on VMPs and medicated feed is that they lay down a wide range of concrete measures to fight AMR and to promote a prudent and responsible use of antimicrobials, following the "One Health" approach. Such measures, applying to EU Member States, include:

A ban on the **preventative** use of antibiotics in groups of animals

A ban on the **preventative** use of antimicrobials via medicated feed

Restrictions on **metaphylactic** use of antimicrobials (control treatment preventing a further spread of infection)

A reinforced ban on the use of antimicrobials as growth promoters and increasing yield

The possibility to reserve certain antimicrobials for human use only

Obligation for member states to collect data on sale and use of antimicrobials

Science based MPL for cross contamination of feed with antimicrobials (carryover)

Various measures for responsible and prudent use of antimicrobials (return of unsued medicated feed)

Issues of concern are carryover of medication to follow on feed, handling of returned medicated feed and the need to ensure homogeneity levels. Igfa's position is *"medicated feed is a service to farmers and veterinarians and the role of the feed industry was to feed and maintain the health of animals. Strategy"*. A meeting with the medicated feed mills will be planned for January 31st in order to discuss the regulation and develop a strategy.

APHA as part iNAP Implementation committee have drafted **"Responsible Use Guidelines for Irish Livestock Farming"** The ultimate goal is to have sector specific guidelines for Dairy, Beef Suckler, Sheep, Pigs & Poultry (developed by Farmers and Vets working together, and endorsed by DAFM). Included in this is list of CIAs ([Critically Important Antibiotics](#))

Resources available on igfa website

Igfa web site is updated regularly with regulations and other resources. There are two members only pages.

LOG IN & REGULATIONS



On the **Regulations page** you will access regulations, Feed issues and Feed Statistics

On the **Log in page** (*Full members only*) you have access to learning and other resources such as



[ICBF Cow Numbers](#) | [UFAS/QS Registration](#) | [Tariff Rates](#) | [Iodine Calculator](#) | [Code of Conduct Data Sharing](#) | [Mycotoxin Booklet](#) | [Background Feed Levels](#) | [2018 BSAS Session Summaries](#) | [Commodity Price Dashboard](#)

For passwords please contact cornelia.oconnell@eorna.ie