IGFA FEED ISSUES

Contents June #6- 2019

Dates

3rd July	Morepark Irish Dairying growing sustainably
17th July	IGFA & DAFM Meeting
26-27th Aug	Teagasc Moorepark European Conference on Precision Livestock
11th Sept	UK Dairy Day 2019 Telford
17th Sept	IGFA committee meeting
27th Sept	Cork Discovers – A world of Research
30th Oct	iNAP Committee meeting
5-7th Oct	Catchment Science Wexford

Consultations/ Websites

Crop Forecast	**DAFM Reg. & App. FBO's**
EU Feed Protein Balance Sheet 2017-18	
DAFM FBO Forms	DAFM Brexit
DAFM AMR	DAFM Trader Notices
FSAI AMR	Pig Innovation

General News

IGFA Committee Meeting

IGFA Feed Committee meeting took place 18th June. John Coleman Chair gave a very informative presentation on different sustainability systems; Book and claim (B&C), Area Mass balance and Segregation. Ms Hannah Donegan Agriculture Manager Beef and Lamb joined to discuss Tesco Quality Feed Mill audits and Sustainability. Other topics discussed are included in this Feed Issues.

Health and Safety

Raising standards and awareness across the Feed industry is everyone's responsibility. This includes all hauliers who must be suitably qualified and trained and must adhere to all safety protocols on all premises. IGFA members are encouraged to develop a policy of paying attention to safety and finding innovative and simple ways of keeping the issue in the forefront of people's minds as we go into our busy season.

Brexit

5th preparedness communication was issued by EU Commission with a review of possible impact of no-deal. Of particular interest is the setup in the sanitary and phytosanitary SPS field of new Border Inspection Posts (BIPs) or extending existing ones at entry points of imports from the UK into EU and the establishment by ECHA of a "Brexit" window on the REACH website to help UK based registrants of substances to transfer their REACH registrations to EU-27 based representatives ahead of the withdrawal date. The same is expected to be done by UK applicants for authorization of a feed additive see link

Feed industry's use of co-products

On 3 June 2019, FEFAC released its publication called **"Co-products, an essential part of animal nutrition",** which aims to create increased awareness among EU stakeholders and policy makers about the feed industry's extensive use of co-products. **The use of co-products is an illustration of the role European compound feed manufacturer's play in the food chain's circular economy, creating economic and environmental benefits for both the original production process and the livestock sector.**

IGFA have provided DAFM with a copy of the publication which can be viewed here

Trivia quiz – I love my dog!

The following are ingredients of 3 food/feed items. Two of them are fake burgers. Can you pick out, which is the dog food see https://t.co/uqzWIkxpQ7 for answer

Water, Pea Protein Isolate*, Expeller-Pressed Canola Oil, Refined Coconut Oil, Rice Protein, Natural Flavors, Cocoa Butter, Mung Bean Protein, Methylcellulose, Potato Starch, Apple Extract, Salt, Potassium Chloride, Vinegar, Lemon Juice Concentrate, Sunflower Lecithin, Pomegranate Fruit Powder, Beet Juice Extract	Pea, Sweet Potato, Pea Protein, Pea Starch, Lentils, Flaxseed Meal, Sunflower Oil Preserved with Mixed Tocopherols, Calcium Carbonate, Vegetable Flavoring, Salt, Vitamins (Choline Chloride, Vitamin E Supplement, Vitamin A Supplement, Vitamin D3 Supplement, Calcium Pantothenate, Thiamine Mononitrate, Pyridoxine Hydrochloride, Riboflavin Supplement, Niacin, Folic Acid, Biotin, Vitamin B12 Supplement), Minerals	Water, Soy Protein Concentrate, Coconut Oil, Sunflower Oil, Natural Flavors, 2% or less of: Potato Protein, Methylcellulose, Yeast Extract, Cultured Dextrose, Food Starch Modified, Soy Leghemoglobin, Salt, Soy Protein Isolate, Mixed Tocopherols (Vitamin E), Zinc Gluconate, Thiamine Hydrochloride (Vitamin B1), Sodium Ascorbate (Vitamin C), Niacin, Pyridoxine Hydrochloride (Vitamin B6), Riboflavin (Vitamin B2), Vitamin B12

UFAS Working Group

Ufas working group of which IGFA is a member took place on 13th June. Update below of main topics.

Improvements to the UFAS standard driven by HFAA (formerly the FVO) audits on assurance standards and TESCO to take place. *(e.g. unannounced audits starting in September, auditor training/ benchmarking, retail sites selling only bagged feed will now have an audit once every 3 years and the central control site will have an extended UFAS audit covering records & traceability for the retail sites*). UFAS will update members fully over the next few months on the detail. Point of attentions were noted as Labelling & Hygiene, However IGFA suggested in IE, DAFM already focusing on these.

The number of non-conformances for supplier control was high and should be prioritised and analysed. The number and complexity of the RASFFs for additives was pointed to as a sign that this area was causing problems.

It was noted, in UK all salmonella incidents must be reported to authorities, in order that a serotype may be determined & risk management measure put in place.

The lack of alignment of GTP with the gatekeeper protocol was also discussed and it was hoped the standard would come in line with the other EU standards shortly. The UFAS committee questioned the GTP codes acceptance of certification for invoice only sites while permitting large tonnages of products to move through sites /office that never have a third-party independent audit. It was considered that at the very least it left the system open to fraud and perhaps was not a sensible route for participants to choose.

FAMIQS fraud section published in conjunction with PWC. Viewed with much interest as a possible bolt on standard.

A Biosecurity Expert was appointed. As a result of disease outbreak in Scotland farmers must now have their own blower pipes for unloading feed and they are instructed to hang them up and clean them after use.

Analytical testing was discussed including reports that Canadian maize contained DON.

Mycotoxins

Mycotoxins are toxic compounds produced by different types of fungus. Under favourable environmental conditions, when **temperature and moisture** are conducive, these fungi proliferate and may produce mycotoxins. They commonly enter the food chain through contaminated food and feed crops, mainly cereals. In cereals, mycotoxins can result from fungi that either develop in stored crops or from field-borne infections. There are **legal limits** for fusarium mycotoxins deoxynivalenol (DON) and zearalenone (ZON) in grains intended for human consumption & **guidance levels** for feed grains see igfa booklet. **Understanding risk is critical for managing Feed Safety.** With regard to mycotoxins this requires knowledge of the cropping region, previous crop, cultivation approach, varietal disease resistance rating, T3 fungicide dose and rainfall levels during critical stages of crop development. Below is an example of a Risk Assessment by Feed Material developed by IGFA technical committee.

(Risk Profile: 1=Negligible, 2= Low, 3= Moderate, 4=Elevated)

Barley	Citrus Pulp	DDarkG	Maize	Maize Gluten
4	3	4	4	4
Oats	Palm Oil	Peas	PK extr	Pkexp
3	1	1	4	2
Rape expeller	Rape extracted	S. Cane (Mol)	SB Molassed	SB Pulp
1	1	1	1	1
Soya bean dehulled	Soya Hulls	Soybean	Sun Decort	Sun extracted
4	4	2	2	1
Wheat	Wheat bran	Wheat Feed	Wheat Gluten	Whey Powder
3	4	4	4	0

UK Agriculture & Horticulture Development Board (AHDB) to help growers assess mycotoxin risk have recently produced tools and information see link. In IE heavy rain and warm temperature at flowering for some the wheat and barley crops during flowering may have increased the risk of Fusarium infestation. Teagasc do not have regional monitoring in place to help with risk management decision for the industry.

General Food Law Amended

On the 13th June the EU Council passed a review of the "General Food Law regulation" see **next months feed issues**

RASFF June 1st-30th

Total	**313**	Feed Premixtures Feed additives	1 0
Food	268	Feed material Fats and Oils	20 0
Food contact materials	18	Compound Feed Herbs & Spices	1 0
Feed Total	27	Pet food Nuts, nut products & seeds	5 0
Ireland noted in one; Pet Food see attached report			

Technical News

Weights and Measures

We have had a number of queries recently on bag weights; therefore, we contacted the NSAI Legal Metrology who provided the following information. There are two systems.

Minimum system (1 simple rule)
All packages must contain at least the declared quantity so if it is 25kg bag and the batch is 40 bags then all 40 bags must be at least 25kg

Average quantity system
This system operates under 3 rules and all 3 must be adhered to
1. The average weight of a batch must not be less than 25 kg (or 20kg)
2. No more than one package in 40 may contain less than the nominal quantity by more than an amount known as the Tolerable Negative Error (TNE). This amount varies according to the quantity stated on the package. The TNE for a product marked > 15 kgs is 1% Therefore no more than one package in the 40 may contain less than 25 – 1% = 24.75kg (or 20-1% = 19.8kg)
3. No package in the batch can be less 25 – 2% = 24.5kg (or 20 – 2% = 19.6kg)

There are situations where these rules do not apply i.e. if product is being packaged in front of the customer e.g. Cheddar cheese where it is cut, weighed in front of the customer, the actual exact weight is applied to the pack packages intended for export and you can also use the packaging system that is accepted in the country of destination if your exporting. See NSAI link for more information.

Changes to Use of Rodenticides

Rodenticides are products used to control rodents such as rats and mice and are regulated under the EU Biocidal Products Regulation.

The control of rodent infestations is important for Feed Business hygiene as rodents carry diseases.

The rules on permanent toxic baiting using anticoagulant rodenticides **have changed** and as a result permanent toxic baiting must no longer be the go to treatment for the pest control industry.

Using non-toxic bait and monitoring before using full baiting methods is a risk and should be carefully managed and discussed with a professional pest control expert. **Rodent control is a basic pre-requisite to ensure Feed Hygiene.**

USDA to review Biotech Regulations.

The proposed review of Biotech regulation announced by USDA, will mark the first comprehensive revision of the regulations since they were established in 1987. The aim would be to provide a clear, predictable, and efficient regulatory pathway for innovators, facilitating the development of new and novel genetically engineered organisms that are unlikely to pose plant pest risks," according to the document published in the federal register. Plants with traits that are similar to those that could be produced through traditional breeding would be exempt from regulation, under the proposed review. Additionally, those developing new crop varieties would be allowed to self-determine whether their products are exempt from regulation. The agency issued a press release saying its proposal was guided by the principles of sustainable, ecological, consistent, uniform, responsible and efficient, creating the acronym SECURE. "*The SECURE rule will modernize the Department's biotechnology regulations with a balanced approach that continues to protect plant health while allowing agricultural innovation to thrive,"* according to the release.

The proposed revision would shave an estimated $3.6 million from the already hefty price tag of developing new genetically engineered crops — a savings that would drop to just $730,000 for crops that are now being reviewed by the Food and Drug Administration or Environmental Protection Agency, as well as the USDA. The USDA is accepting public comment on the proposal through Aug 5th. The agency also plans to publish a draft programmatic Environmental Impact Statement (EIS).

Post Market Monitoring of maize MON (EFSA)

Following a request from the European Commission, EFSA assessed the 2017 post-market environmental monitoring (PMEM) report on the cultivation of maize event MON810. Like previous years, partial compliance with refuge requirements is reported for Spain. European and Mediterranean corn borer populations collected from North-eastern Spain during the 2017 maize growing season and tested for Cry1Ab

susceptibility show no symptoms of resistance to maize MON 810. No complaints about unexpected field damage caused by corn borers were received through the farmer complaint system. The assessment of farmer questionnaires and relevant scientific publications does not indicate any unanticipated adverse effects on human and animal health or the environment arising from the cultivation of maize MON 810. Overall, EFSA concludes that the evidence reported in the 2017 PMEM report does not invalidate previous EFSA and GMO Panel evaluations on the safety of maize MON 810.

Is a pesticide residue the same as toxicity?

Increasingly today we see in the press "residues of pesticides" in food or feed being referred to as "toxic levels "of pesticides. However, as every toxicologist will tell you "the dose makes the poison" industry needs to communicate clearly the meaning of different pesticide residue levels, how these levels are derived and understand the implication of breaches of these levels in our feed products. The following will hopefully enlighten you further.

Under EU regulations the use of pesticides is authorised after expert risk assessments to determine the nature and magnitude of the health risk passed to humans. This will include an assessment of how much of an active may be present in the environment (soil, water or food) and how much contact humans may have with these environments. Very specific testing is done to determine the upper levels where there is no observable adverse effect **NOAEL**. If a product contained levels above NOAEL then immediate steps would be taken by the authorities to remove these products from the market.

Acceptable daily intake **ADI**: this is a toxicological safety limit specifying the amount of a substance which can be ingested every day over an entire lifetime without a recognisable risk to health of the consumer.

Acute Reference Dose **ARfD:** this is a toxicological safety limit specifying the amount of a substance which can be ingested on a single day without any effect on the health of the consumer.

ADI and ADrF are calculated by dividing the NOAEL by at least 100. If a product contains levels above the ADI or ADrF then on a case by case basis a decision may be made to withdraw the product. These levels are expressed in mg / kg of body weight.

Maximum residue level **MRL**: These are not toxicological safety limits. They are commercial standards and serve as an indicator that the farmers have applied the pesticide according to Good Agricultural Practice **GAP.** Some MRLs may have some toxicological factors included. An MRL breach may not be legal for trade but may still be safe for human health. MRLs are expressed on mg/kg

Using malathion as an example

*MRL for Malathion in strawberries is 0.02mg/kg
ADI is **0.03mg/kg bw/day** & ARfD is **0.3 mg/kg bw**

A person weighing 72.5kg (bw) eating 1kg of strawberries testing at the MRL is getting 0.02/72.5 = **0.0003 mg/kg bw**.

Therefore, the intake levels for this person eating 1kg of strawberries is well below the toxicological safety levels

**The EU pesticides database MRLs shows all these residue levels for each active substance*

Labelling of Compound Feed

We would like to remind you of the **labelling Code of Practice** which was developed by European Feed Association FEFAC and Copa-Cogeca and endorsed by the EU Commission in consultation with national control authorities. It provides practical recommendations on how to label compound feed in accordance with the provisions laid down in Regulation (EC) No 767/2009 on the placing on the market and use of feed. This Code will be updated regularly.

Some IGFA members have found it very useful to refer to it during their DAFM and other external audits. To access the code click here. Any problems accessing contact cornelia.oconnell@eorna.ie

Labelling of Additives & Premixtures

The labelling rules for additives and premixtures are laid down in Regulation (EC) No 1831/2003 see link

It states in general that *"detailed labelling of the product should be required since it enables the end-user to make a choice with full knowledge of the facts, creates fewer obstacles to trade and facilitates fairness of transactions".*

- ***Article 16** defines more specific requirements for the labelling of feed additives and premixtures. It includes a list of information that shall necessarily be part of the labelling*
- ***Article 9**(5) provides that the individual authorization of an additive shall include specific additional requirements for the labelling of the feed additive necessary as a result of conditions and restrictions imposed under the assessment of this additive.*
- ***Annex III** provides specific labelling requirements for certain feed additives and premixtures*