



Contents	Nov #11- 2019
Climate Action Consultation Agriculture	1
Food Wise 2025	1
EU Protein Balance Sheet 2018/2019	2
Plant Protein Seminar.....	2
New Breeding Techniques (NBT's).....	2
RASFF Nov 1 st -30 th	2
GMP+ FSA Public Consultation.....	2
AMR-Antimicrobial Resistance	2
Pesticide Work Shop	3
Glyphosate.....	3
Trader Notices 2019.....	4
Trader Notice 3.....	4
Trader Notice 4.....	4
Feed Additives Register	4

Dates

Dec events	Teagasc events see link
4 th Dec	Fefac Council Meeting
20 th Jan	iNAP 8 th Meeting
Thurs 30 th Jan	IGFA Feed Dinner
3-5 th June	Sustainability Congress

Consultations/ Websites

Crop Forecast	DAFM Reg. & App. FBO's
Protein Balance Sheets	ClimateChange Presentations
DAFM FBO Forms	DAFM Brexit
DAFM AMR	DAFM Trader Notices
FSAI AMR	Pig Innovation

The consultation process is now open, and will end

General News

Climate Action Consultation Agriculture



17th Nov., Minister for Agriculture, Food and the Marine, launched a public consultation on “Ag-Climatise”, a *National Climate & Air Roadmap for the Agriculture Sector to 2030 and Beyond*.

The Minister stated, “The importance of addressing climate change and reducing

greenhouse gas emissions has been reflected in the recent All-of-Government **Climate Action Plan 2019** (available [here](#)), which has clearly set out the ambition for Ireland”. The action plan sets out the following targets.

- ✦ an emissions reduction target of 10% to 15% for agriculture, bringing emissions to be between 17.5 and 19 Mt in 2030.
- ✦ The sector will also contribute to the removal of 26.8Mt CO₂ from the atmosphere through afforestation and new ways of managing land.

Using these targets as an overarching framework, **Ag-Climatise** is the roadmap for the agri-food sector. The structure is composed of three elements:

Implementing Changes Now: eg. adoption of low emission slurry spreading equipment and changes in fertiliser type;

Acting in Partnership: all stakeholders, from farm to fork, will have to contribute in a spirit of partnership, bearing in mind the need for a just transition;

Preparing for the Future: using best available science to inform policy development and to help stakeholders make strategic choices for the future.

Friday 10th January 2020. It is composed of two elements

Ag Climatise roadmap which sets the scene and poses a number of questions
Click [link](#)

An online survey to facilitate a response to the questions (approx. 35 minutes)
Click [link](#)

Food Wise 2025



Department of Agriculture, Food and the Marine (DAFM) has begun the process for developing the next ten-year strategy to replace Food Wise 2025 and a public consultation forms an essential part of this process. A formal public consultation has taken place. The public consultation document can be found [here](#)

DAFM followed the consultation with an ‘Open Policy Debate’ at the Aviva Stadium, Dublin on the 16th October 2019 to further facilitate discussion and consultation with stakeholders on the strategy to 2030.

Presentations and videos of keynote addresses are now available online and can be viewed [here](#)

EU Protein Balance Sheet 2018/2019

The drought observed in 2018 in Europe had a significant impact on the overall feed supply for 2018/19. The level of EU self-sufficiency and total feed supply decreased compared to the previous years. The self-sufficiency dropped from 80% to 77%, with a lower availability of roughage, partly replaced by higher maize imports. The total feed supply was down by 4%, to 83 million tonnes, due to the reduced size of cattle and pig herd.

These are among the key findings of the 2018/19 EU feed protein balance sheet, published on 14th November by the European Commission see [link](#).

Plant Protein Seminar



The Plant Protein Seminar took place on 18th/19th November in Helsinki, organised by Finnish cereal producer in cooperation with the EU Finnish Presidency. **Coleman Purcell Dairygold** represented IGFA & FEFAC sharing his expertise on EU

protein plan and Dietary Strategies to Improve Nitrogen Efficiency.

New Breeding Techniques (NBT's)

The EU Council will ask the Commission to conduct a study into the "status of novel genomic techniques" for plants under EU law. The move could be the first step toward changing EU law to permit new kinds of plant gene editing such as CRISPR, which has been hampered since [Europe's top court ruled last year](#) it should be treated just as strictly as genetically-modified organisms.

New breeding techniques involve directly changing a plant's native DNA rather than introducing foreign genes. The [legislative act](#), will call on the Commission to submit a study by the end of April 2021 "to clarify the situation" of how the bloc should respond to the ECJ ruling. The more than 18-month study, which will be conducted by DG SANTE, may also result in a Commission proposal on the issue, "if appropriate in view of the outcomes of the study," The Commission [said earlier this year](#) it had no plans to evaluate current GM legislation as a result of the court ruling. The Council document said the ruling created uncertainty about the EU's stance on crops that are produced using these undetectable techniques and then imported into Europe. The outgoing Health and Food Safety Commissioner Vytenis Andriukaitis said in June: "From my point of view, we need to have [new legislation](#) [because] we have no chance to regulate (these techniques) based on old the legislation." It is

unclear at this point what stance the new Commissioner may take. IGFA will monitor the progress of the report with FEFAC over the next few months.

RASFF Nov 1st-30th

Total	345	Feed Premixtures	0
		Feed additives	0
Food	314	Feed material	18
		Fats and Oils	0
Food contact materials	7	Compound Feed	5
		Herbs & Spices	0
Feed Total	24	Pet food	1
		Nuts, nut products & seeds	0

GMP+ FSA Public Consultation

In response to comments and feedback from the GMP+ Community, the GMP+ FSA module has undergone a renewal. After more than two years of listening, reviewing, writing and re-writing, together with the Working Group and various stakeholders to read more click [link](#).

AMR-Antimicrobial Resistance

APHA have published the following general and sectoral specific guidelines following. These have been agreed by Veterinary Ireland, DAFM, IFA, Teagasc (Pigs) and ICMSA (Dairy). Click the number to access relevant guide.

Code of Good Practices	
1	General Responsible Prescribing and Use of Antibiotics in Farm Animals
Sector Specific	
2	Responsible Use of Antimicrobials on Dairy Farms
3	Responsible Use of Antimicrobials on Pig Farms

The Poultry, Sheep and Beef are currently being worked on. The First Ever Animal Health Awareness Day took place (November 28th, 2019) is an initiative of the Department of Agriculture, Food and the Marine. Supported by a range of stakeholders from across the agrifood industry and third level institutions including the IFA, Teagasc, Animal Health Ireland, The School of Veterinary Medicine at UCD, Veterinary Ireland and ICBF. We will bring you more information on this in December Feed Issues.

Technical News

Pesticide Work Shop



130 participants attended the COCERAL / FEDIOL /FEFAC workshop on trade issues with pesticide residues on 12th November 2019. The main objectives were to assess the possible consequences on trade of the elimination of MRLs (replaced by LOQ of 0.01 ppm) for substances falling under the cut-off criteria (i.e. no longer authorized in the EU while still used in Third Countries) and consider possible solutions to mitigate the risk for EU imports.

Industry stressed that COCERAL, FEDIOL and FEFAC had joined forces to map out most critical combinations substances /commodities / exporting countries and initiate dialogue with third countries and pesticides producers with a view to get requests for **Import Tolerances** submitted in due time and/or consider alternative options. At the same time, these actions require time and therefore long enough transition measures are required to avoid trade disruption. In practice, this means that authorities should not delete immediately existing import tolerances for cut-off substances but maintain them until they have been risk assessed by EFSA.

Representatives from DG SANTE, ECPA and the Argentinean Mission to the EU joined the speakers for a Roundtable placed under Chatham House rule. There was a general agreement that dialogue and information sharing was essential to better assess the situation and the risks for the trade as well as the possible solutions. Delegates voiced the opinion that the number of modifications and the permanent obligation put on farmers in third countries to adapt to new EU limits was extremely burdensome. On the other hand, there was a clear call to Third Countries to help in identifying those substances that are not only authorised but effectively used in their country to facilitate the identification of “hot spots”. **The workshop acknowledged the EU trend for products with less pesticides and the huge political and media pressure put on EU Institutions. It was however reminded that the EU legislation on MRLs is not meant to be used by the EU as an instrument to impose its pesticide policy to the rest of the world.**

The compound feed speaker highlighted the many major stumbling blocks to allow operators to clearly determine the regulatory maximum levels of residues:

many combinations active substances/ processed feed materials: a lack of a list of products exclusively used as feed (so-called “footnote 1”), processing factors, standard risk assessment methodology in case no MRLs can be defined, accurate laboratory analysis and lack of technical capacity within the industry and the authorities.

The Belgian authorities presented their protocol on handling MRL breaches and risk assessments developed with the industry. It was agreed harmonised protocols across member states would be useful.

All of the presentations are available for members on IGFA Members only web page see [link](#) or click the number to access relevant presentation here.

1	Action plan to mitigate impact of reduction of MRLs on trade, Adina Creanga – Bunge
2	Traders perspective on upcoming challenges for EU imports, Audrey Rensen- Cefetra
3	Traders perspective on upcoming challenges for EU imports, Federica Demaria - Ente CREA
4	Complying with EU MRLs: challenges for a Third country operator, Rosalind Leeck
5	The experience of a compound feed manufacturer, Manfred Hessing – ForFarmers
6	BfR database on processing factors: added value and limitations Arno Kittelmann - BfR
7	Belgian guidelines on pesticide residues Damien van Oystaeyen (AFSCA/FAVV - Belgium)
8	Closing remarks, Marta Zuluaga Zilbermann - Cargill

Glyphosate

Members attention is drawn to the Austrian notified measure 2019/419/A (Austria) see [link](#) to ban glyphosate-based herbicides by 1ST Jan 2020. The following wording has been notified on the website. In § 18(10) the sentence ‘The placing on the market of plant protection products containing the active substance glyphosate is prohibited with regard to the indication “desiccation”, provided that the harvested crop is intended for use as food or feed.’ is replaced by the following sentence:

‘The placing on the market of plant protection products containing the active substance glyphosate is prohibited in accordance with the precautionary principle.’ The use of the precautionary principle as justification for this move erodes the argument that the internal market in the EU is based on common scientific principles and is an example of individual member states undermining confidence in our EU scientific bodies such as EFSA. IGFA will continue to

encourage the Irish authorities to take a science based approach to its decision making process.

Trader Notices 2019



To date in 2019 there has been 4 trader notices issued by DAFM

TN 01	Arrangements for Official Controls for feedingstuffs and feed material originating from outside the European Union
TN 02	Arrangements for the control of Fertilisers originating from outside of the European Union.
TN 03	Retention of feed samples and labelling of feed additives and premixtures
TN 04	Export of feed including non-authorized (in the EU) feed additives or mixture of feed additives to non-EU countries

Trader Notice 3

Trader Notice 3 was issued by DAFM on 11th November reminding FBO's of their obligations under (EC)183/2005 (Feed Hygiene), (EC) 767/2009 (placing on the market and use of feed) and (EC)1831/2003 (additives for use in feed). In particular,

Sampling

(EC)183/2005 Annex II Quality Control reminding FBO's that their sample size of ingredients and feed products needs to be of sufficient quantity in line with your own procedures. Secondly they reminded that samples must be kept in sealed containers and in adequate storage conditions to avoid adulteration, labelled for easy identification and traceability. Retained samples must be kept until the end of shelf life.

Approving Suppliers of feed additives and Premixtures

Sourcing and intake procedures must include steps to ensure that additives and premixtures are labeled in line with Regulation (EC)1831/2003 article 16 and compound feed must be labelled in line with (EC) 767/2009

The following Code of practices should be used as guides to ensure you are in compliance with Labelling

Code of Practice for labelling Compound Feed	Developed jointly by Copa-Cogeca & FEFAC
Code of practice for labelling Additives & Premixtures	Developed jointly by EMFEMA, FEFAC & FEFANA

Trader Notice 4

Trader Notice 4 also issued by DAFM on 11th November, related to the export of feed additives including non-authorized in the EU or mixtures of feed additives to non EU countries. In accordance with article 12 EC 178/2002 (General Food Law).

1. All feed exported from the EU to a third country shall comply with the relevant requirements of feed law, **unless otherwise stated** by the authorities of the importing country or by regulations and procedures that may be in force in the importing country.
2. The export of non-authorized (in the EU) feed additives of mixtures of feed additives **can only take place if** the Competent Authority of the country of destination has **expressly agreed** to the placing on the market of such product on their territory. The agreement should be in the form of **written communication** between the Competent Authority of the country of the destination and the FBO exporting the non-authorized (in the EU) feed additives or mixtures of feed additives.
3. Where a **bilateral agreement** concerning feedingstuff is in place between the EU or one of its Member States and a third country, feed exported from the EU or that Member State shall comply with the provisions of **that agreement**.

We expect these Trader notices are as a response following the FVO audits in Ireland last March/April.

The first two corrective actions were: DAFM will issue trader notices before end of this month, trader notice covers CA 1 and 2) see [link](#).

Feed Additives Register

[Edition 11/2019 \(277\)](#) was released on 31st October 2019

