



MONTHLY FEED ISSUES

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General News

Northern Ireland Protocol Update

On 27 February the EU and the UK agreed a deal in principle to make changes to the Northern Ireland Protocol. The new agreement is referred to as "The Windsor Framework". It amends the protocol and includes changes to rules for movement of goods from Great Britian (GB) into Northern Ireland.

The new deal is designed to restore the smooth flow of trade within the UK internal market, safeguard Northern Ireland's place in the Union and address democratic deficit concerns of citizens. The deal will be subject to a vote in the UK parliament. The timing of this vote is still unclear.

A link to the full version of the agreement is here and a breakdown of the info by sector is here. The European Commission has also published a Q&A <a href="here. The UK and the EU have agreed to implement all solutions in good faith and to exploit the potential of the Trade and Cooperation Agreement to continue to build a positive EU- UK relationship.

As we are still waiting for further details, legal texts etc. we cannot answer questions in relation to the operation of the new procedures as yet. However, if the material published raises areas of concern, please send on these concerns so that we are aware of them and can seek clarification.

Year End 2022 Compound Feed Figures



Animal feed statistics are based on surveys and information sourced by IGFA from various sources. This data provides information on the quantities of animal feed manufactured in the Republic of Ireland and animal feed and feed materials imported on a monthly, quarterly and annual basis. It is a vital source of information for the feed industry to analyse trends in production for the various sectors and

forecast production in the future. 2022 year end compound feed figures are available for members on https://igfa.ie/feed-statistics/

Sanctions against Russia

On 25 February, the Commission agreed the Council's adoption of a 10th package of sanctions against Russia. To further increase the effectiveness of EU sanctions this package contains new listings as well as trade and financial sanctions, including further export bans worth more than €11 billion, depriving the Russian economy of critical tech and industrial goods. It also steps up enforcement and anti-circumvention measures, including a new reporting obligation on Russian Central Bank assets. A link to a Q&A page prepared by the Commission on the package can be accessed here.

EU sanctions regulations have direct effect in all Member States of the EU, and, as such, are legally binding on all natural and legal persons in Ireland. Private companies, therefore, have an obligation to ensure that they are in full compliance with these new measures. The Department of Trade and Enterprise has prepared a <u>Guidance Notice</u> for further info.

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RASFF'S FEB 2023

TOTAL FOOD & FEED	382
TOTAL FEED	22
FEED MATERIALS	17
PET FOOD	2
COMPOUND FEED	1
PREMIXTURES	1
FEED ADDITIVES	1
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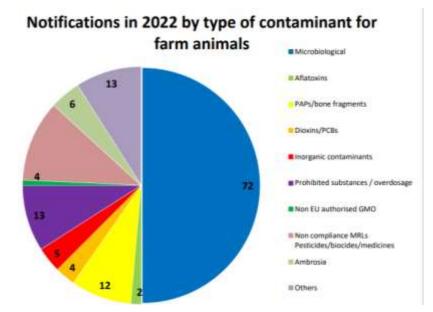
For more information or useful links visit www.igfa.ie or https://twitter.com/IGFAie

European Commission - Price Dashboard

Through this dashboard, the European Commission provides a monthly summary of price data for the most representative agricultural products and consumer food prices, at both an EU and a global level. The latest edition of is now available here

Overview of Feed Related RASFF Notifications In 2022

As a key outcome of its Feed Safety Incident Management policy, FEFAC drafts an annual report on the feed-related notifications to the RASFF to identify possible trends and emerging issues. This statistical exercise does not pretend to reflect an evolution of the state of feed safety in the EU but is an indicator of where attention should be focused.



The number of RASFF notifications concerning feed for food-producing animals is very similar in 2022 compared to 2021 both in numbers (228 vs. 233) and nature of non-compliances (half of the notifications related to Salmonella).

The main emerging issue in 2022 was related to non-compliance with the MRL for ethylene oxide and 2-chloroethanol with 6 notifications. However, four of them were related to the detection of high levels of 2-chloroethanol in choline chloride (2) and wheat proteins (2). In both cases, there is no link with the illegal use of ethylene oxide.

It is worth noting the increase in number of notifications for non-compliance with maximum limits for MRLs for pesticides, in particular chlorpyrifos.

It is also worth noting there were four incidences which involved Ireland. Details below

Ref.	Category	Subject	Date	Notifying Country	Distribution	Origin
2022.7 049	Feed Materials	Product of animal origin detected in Bread intended for animal feed	Dec	Ireland	Ireland	United Kingdom
2022.6 644	Feed Materials	Maximum levels exceeded for ragweed in wild bird feed from Germany	Nov	Germany	Denmark, Poland, France, Romania, Austria, Hungary, Belgium, Ireland , Switzerland, Italy, Germany, Luxembourg	Austria
2022.2 296	Premixtures	Not authorized GMO in feed additive	April	Belgium	Netherlands, Malaysia, Northern Ireland , Belgium, Germany	Belgium, Bulgaria
2022.1 439	Compound Feeds	Furazolidone (AOZ) in feed for bees	March	Ireland		Russia

Environment News

IGFA response to Consultation on Sustainable Use of Pesticides Regulation

The DAFM public consultation on the Commission's proposal for a Sustainable Use of Pesticides Regulation closed for responses on 24 February. The proposed regulation sets two targets for pesticides. The legal requirement for the setting of these targets uses baseline data from 2015-2017.

1. To reduce by 50% the use and risk of chemical pesticides by 2030. This target is measured using pesticide sales data which measures the quantities of active substances contained in the pesticides which are sold, and therefore used, in each Member State, and a weighting based on the hazardous properties of these active substances.

2. To reduce by 50% the use of more hazardous pesticides by 2030. This will be measured by sales data for the more hazardous pesticides.

There are additional items in the proposal on issues including sensitive areas, advisors and integrated pesticides management (IPM). IGFA submitted a response to the consultation highlighting concerns related to the potential impacts on Irish production and the compatibility of the targets with other agri and environmental policies. It is available here.

Belgium Referred to European Court of Justice (ECJ) Over Nitrates

Belgium has been referred by the Commission to the ECJ over its failure to properly implement the Nitrates Directive. The commission explained that the nitrates action plan for the Walloon Region of Belgium falls short of what is required and even though there has been a deterioration in groundwater quality, the authorities have failed to update or revise the plan. The Commission therefore decided that further action was necessary as the appropriate measures had not been taken to reduce nitrate pollution.

New EU Protein Plan

The commission is planning to update and review the EU Protein Plan by 1 January 2024. The first protein plan was published in 2018 and indicated that there is growth potential for EU plant proteins in premium feed and food sectors. This 'potential' has become even more important in recent years as discussions focus on whether dependency on imported protein puts the EU in a vulnerable position. The impact of the war in Ukraine on feed prices has also drawn attention to the need for a broader, deeper EU Protein Plan that not only aims to increase our production of vegetable proteins, but helps contribute to sustainable food systems in Europe.

Technical News

Feed Additive Authorisation Regulation

The revision of the Feed Additives Regulation (No 1831/2003) has been postponed until 2025 apparently due to a lack of resources. The aim of the revision was to make it easier to bring sustainable and innovative additives to market, streamline the authorisation process without compromising health and food safety and make livestock farming more sustainable. It is likely that work in this area will now be stalled until the next administration, which will take office at the end of 2024. The revision is led by DG SANTE and a complete Impact Assessment is likely to be necessary and will require further studies. Recent meetings of the Standing Committee on Plants, Animals, Food & Feed (PAFF) on Animal Nutrition have been dominated by the authorisation of pending feed additives and the monitoring of contaminants.

Feed Additives Re-Authorisations

A number of nutritional feed additives are now undergoing a renewal of the authorization, in particular for vitamin D, choline chloride and cobalt salts, as well as several methionine compounds. With regard to cobalt salts, the applicant for all salts apart from coated cobalt carbonate missed the deadline for submission of a dossier for renewal. This means instead of a reauthorisation process, the applicant had to submit a dossier for a complete new authorization. As a result there could be a risk that cobalt salts (with the exception of coated cobalt carbonate) will no longer be authorized as from 15 July 2023. The Fefac Premix & Mineral Feed Committee will discuss this at their meeting on 8 March 2023. This meeting will be attended by IGFA and we will report an update in the March IGFA Feed Issues.

Other feed additives that have not had a application for renewal of authorization and will see their authorization expiring in 2023 are Sodium L-methionine (3c302), Selenised yeast Saccharomyces cerevisiae NCYC R646, inactivated (3b813) and zinc chelate of methionine (3b611).

Vitamin D3

The Belgian and the Dutch authorities have recently blocked consignments of D3 imported from China, because they were missing official confirmation from the EU Commission that the process of revision of decision 2002/394 to lift the restrictions to import of vitamin D3, cholesterol and lanoline from China had been launched. This confirmation was since provided orally by DG SANTE to SCOPAFF members at their meeting on 7-8 February. DG SANTE informed FEFAC that the confirmation will also be provided in writing through a letter to CVOs in principle.

Undesirables - Mycotoxins (DON) in feed

On 2 February EFSA published an opinion on the risk of DON for poultry and horses, based on new scientific evidence. This new EFSA opinion points to adverse effects at levels as low as 1.9ppm for broilers and 1.7ppm for turkey, whereas in its

previous opinion, EFSA noted 5ppm for DON in broilers and laying hens and 7ppm for ducks and turkey. For horses, 5.6 ppm is reported in the updated opinion, vs. 36ppm in the previous one.

This opinion should logically lead to a revision of the proposal for modification of the regulatory limits for DON, ZEN, FUM, OTA and T2/HT2 in feed, which has been discussed for almost 3 years now. The main delay to changes to mycotoxin levels is the proposal from the EU Commission to replace guidance values by maximum limits for these mycotoxins in compound feed. IGFA is following these discussions closely.

Medicated Feed – Carry Over Levels

The EU Expert Group Animal Nutrition met on on 21 February and different options for the setting of maximum carry-over levels for antibiotics from medicated feed to non-target feed were discussed between stakeholders and Member States. The discussion was based on a paper drafted by the EU Commission which underlines that medicated feed is a safe route for delivery of antimicrobials to animals. It says that if the conditions for manufacturing medicated feed become too demanding, it could not only discourage feed manufacturers but encourage the use of antimicrobials in top dressing or water solubles form, which has the potential to favour AMR emergence or development. This paper also stresses that the maximum limits as calculated by EFSA were not enforceable and proposes other options for the setting of maximum limits, i.e.

- I. At LOQ (lowest detectable levels)
- II. at levels where no growth promotion effect is seen and
- III. at levels equivalent to 1% of the lowest dosage

IGFA consulted with its medicated feed members and based on the responses received advised DAFM that the first and second option would mark the end of medicated feed. The third would be be feasible but extremely challenging and require considerable investment in a market situation where the prescriptions for medicated feed are on a downward trend. IGFA added that any additional risk management measure to be taken by operators (e.g. dedication of production lines to medicated feed, installations of end-of-line mixers, systematic flushing or fine dosing systems at the back of the delivery truck) would mean investments with huge uncertainty on the possible payback and therefore were not considered an option.

This topic will be discussed at IGFA feed committee meeting on 7 March and a briefing paper will be provided to medicated feed members before the end of the month with a summary of the state of play.

EFSA Opinion on the Welfare of Broilers And Laying Hens

EFSA is working on a series of opinions on animal welfare and have just released one on the welfare of broilers and laying hens. For broilers the study recommends

- Limiting the growth rate of broilers to a maximum of 50 g/day.
- Substantially reduce the stocking density to meet the behavioural needs of broilers
- Avoiding the use of cages, feed and water restrictions in broiler breeders.
- Keeping ammonia concentration in the barn below 15 ppm.

The main recommendations for laying hens are

- To house birds in cage-free systems
- To implement all preventive measures against injurious pecking to phase out beak trimming.
- To implement harmonised assessment methods and scoring systems on a farm for monitoring mortality and wounds, plumage damage, keel bone fractures and carcass rejection at slaughter.

For both species, EFSA recommends a specific design for barns, e.g. use of a veranda, access to an outdoor range covered with vegetation. Further details are available here.

The EFSA opinion has been criticised by farming groups who highlight the huge investment that would be necessary to make these changes. Another EFSA opinion on the welfare of dairy cows is due in the next few weeks.