

## General News

### Black Sea Grain Initiative extended

On 18 March 2023, the Black Sea Grain Initiative (BSGI) allowing Ukrainian grain exports to pass through the blockaded Black Sea, was extended. The UN did not specify the duration of the renewal in the official communication. The first extension, agreed last November, was for 120 days but the Russian side has indicated that this latest renewal would be for no more than 60 days as a result of restrictions on Russian exports. So far the BSGI has enabled the export of 24million metric tons of grain and food products. 55% of food exports have gone to developing countries. The continuation of the BSGI is therefore considered crucial for global food security.

### Solidarity lanes - Ukraine and Poland reach a bilateral agreement

The EU's solidarity lanes have helped Ukraine export over 15 million metric tons of grain, oilseeds and related products since May 2022 and have proven to be essential corridors for Ukraine's agricultural exports. However, some central and south eastern member states raised concerns about the volume of Ukrainian grain that was remaining on the market and the impact this was having on national prices. The issue has caused farmer protests in some countries resulting in pressure on governments to take action.

At the start of March a new arrangement between Poland and Ukraine entered into force, aiming at improving and sealing the Ukrainian cereals and oilseeds 'in transit' through the territory of Poland. It is hoped this agreement will ensure that product does not get stuck on the internal market and moves straight to its destination country.

### Nitrates Derogation 2023

Members are reminded that under the [2023 Nitrates Derogation terms and conditions](#) the general conditions state that 'A maximum crude protein content of 15% in concentrate feed for grazing livestock must not be exceeded between April 15<sup>th</sup> and September 30<sup>th</sup> 2023. This information must be included in feed concentrate records farmers submit annually'.

Some more detail is available in the Statutory Instrument 113 of 2022 (and amended SI 393 of 2022) which says that '*on holdings with grassland stocking rates of 130 kg nitrogen per hectare from grazing livestock manure (dairy cows and other bovines two years old and over) or above prior to export of livestock manure from the holding, a maximum crude protein content of 15% is permissible in concentrate feedstuff fed to grazing livestock on the holding between 15th April and 30th September*'

As there is some confusion on the detail, IGFA confirmed answers to the below questions with DAFM Nitrates Division on 3 March 2023.

**Question** - Is this requirement only for dairy cows on the holding? **Answer** - No, this measure is focused on dairy cows and cattle over two years and does not apply to livestock under two years.

**Question** - What will be the level of Crude Protein (CP) allowed in concentrate feeds for grazing livestock at grass? **Answer** - Bovine livestock greater than two years old, including dairy cows, fed on a 100% grass forage diet during the main grazing season will be required to comply with a maximum of 15% CP (on a fresh weight basis) between 15<sup>th</sup> April to 30<sup>th</sup> September in 2023.

**Note:** If higher levels of crude protein are required, this needs to be justified and certified by the appropriate advisor.

**Question** - Who qualifies as an appropriate advisor for the purpose of this certification? **Answer** - An appropriate advisor is the compounder, supplier of feed, nutritionist or agricultural advisor.

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### RASFF 'S MARCH 2023

TOTAL FOOD & FEED	433
TOTAL FEED	32
FEED MATERIALS	20
PET FOOD	5
COMPOUND FEED	2
PREMIXTURES	0
FEED ADDITIVES	5

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The nitrates derogation will run until 2025 but is subject to an interim review in 2023. This review is planned to be completed by September 2023.

## European Protein Strategy

Discussions on EU proteins continue in Brussels and the MEPs have issued a draft report calling for an ‘ambitious EU protein strategy to improve the bloc’s feed autonomy and its ability to grow all possible protein sources’. It proposes strengthening the production of protein crops for animal feed and plant-based foodstuffs, as well as protein-filled “novel food” such as insects. Legislative measures suggested include a feed additive regulation that enables stability and innovations in feed additives, a regulation on new genomic techniques and a combination of CAP rules that provide incentives for the production of protein-rich crops, grassland and legumes. The report will be discussed and amended in the European Parliament over the coming months and will feed into the Commission’s new EU Protein Plan due for publication at the start of 2024.

## EU Short-Term Outlook Of Agricultural Markets 2023

The commission published the Spring Edition of the above report on 30 March. It presents a detailed overview of the latest trends and prospects for a range of agri food sectors. Some highlights include

- The input price pressure on farmers is expected to ease in 2023 but input costs are forecast to remain well above the long-term average.
- Food inflation remains significant, with EU average food prices 19.5% higher in February 2023 than February 2022. Despite declines in some input costs, food prices are expected to remain at high level for a while before turning downwards.
- Hot and dry weather impacted EU cereal production in 2022/2023, in particular maize with yields that dropped by 25%. Total EU cereal production in 2023/24 could reach 288.4 million tonnes (+8.6% year-on-year), assuming normal weather conditions. An anticipated decrease in EU meat production is expected to reduce the use of cereals for feed, while food use is due to increase lightly.
- EU oilseed production in 2023/24 could increase by 7% year-on-year to reach a new record of 33.6 million tonnes.
- In 2023, a declining EU raw milk price is likely to lead to increasing slaughtering’s as feed and other input costs could remain high. Overall, the EU dairy herd could shrink by 1%. EU exports of cheese could grow by 2%, driven by demand in China, the UK and US.
- EU beef production decreased in 2022 by 2.4%, and is expected to decrease further in 2023 by 1.6%, mainly due to a structural adjustment in the beef and dairy sector, despite high beef prices.
- EU pigmeat production decreased on average by 5.6%. Due to the limited supply, EU domestic use decreased by 2.8% in 2022 and this is expected to go down further in 2023 by 5.5%.
- EU poultry consumption could go up by 2.5% and EU imports are expected to increase by 7% in 2023 to cover this demand growth.

## Trader Notice 04/2023 - Labelling and advertising of milk replacer for calves

As calving season is underway DAFM has issued a trader notice to remind manufacturers of their obligations as regards the labelling and advertising of milk replacer.

A summary is as follows

1. Calves up to 28 days need to be fed a minimum two liquid milk feeds per day in order to meet their nutritional and welfare needs.
2. Calves over 28 days - it is necessary for those responsible for their care to decide whether the quantity and quality of solid feed (i.e., compound feed and roughage) being consumed by the calf is sufficient to constitute a second feed in the context of the health and welfare of calves.

The labels must be clear and not misleading and in line with the requirements set out in the feed labelling regulation (EC) No 767/2009. Read the full trader notice [here](#)

## Environment News

### Organic Farming Survey

DAFM conducted a major survey of organic farmers to establish regional feed requirements for organic concentrate feeds, straight feeds and forage for the 2023/2024 winter. The objective of the survey was to highlight the opportunities for organic tillage farmers to grow grain and grain/ protein crops to meet the growing demands, facilitate partnerships between tillage and livestock farmers for interfarm trading of feed, and to provide information to feed merchants to ensure they can meet demands for the winter. DAFM has provided us with the results and conclusions of the survey, available [here](#).

## Green Claims

On 22 March 2023, the European Commission published its proposal for an EU Directive on Green Claims, meant to provide a horizontal framework for environmental claims in a B2C context for all economic sectors. The Commission foresees that the legislation will play an important role in tackling greenwashing and protecting consumers from unsubstantiated and false green claims.

This topic is being watched closely by IGFA and the FEFAC green labelling code of practice task force which IGFA sits on. There is a [possibility to provide feedback](#) on the published proposal until 19 May 2023. IGFA will prepare a summary briefing and circulate to members.

## Animal Health

### Avian Influenza Update

H5N1 continues to be found in wild birds in Ireland so the Avian Influenza (Precautionary confinement of birds) Regulations 2022 therefore remain in force. Flock keepers are required to confine all poultry and captive birds in their possession or under their control in a secure building to which wild birds, or other animals do not have access. Housing is a support to biosecurity, not a substitute. Biosecurity remains the best form of defence against disease introduction to a premises. All flock owners are legally required to maintain best practice biosecurity measures. All poultry and captive bird owners are reminded to review and, where necessary, improve their biosecurity procedures on their premises to ensure that all appropriate measures are in place. For more information see DAFM bulletin of 24 March 2023 [here](#).

## Technical News

### Pesticides MRLs and the Footnote

The February SCoPAFF meeting on pesticides addressed an issue of particular importance to feed material suppliers. This was the possible deletion of foot note 1 of 396/2005. This is a derogation, whereby no MRLs are applied to feed materials unless they are whole grains, until the MRLs can be set out in the Annex. Currently the EU Commission does not have the time or resources to work on feed material MRLs so this annex remains blank. Therefore in the event that an MRL is found to be above the level set for the whole grain/oilseed, DAFM feedingstuff section complete a full risk assessment, using typical Irish rations before they permit suppliers to release product onto the market.

The EU feed chains position on this possible deletion is that removal of the derogation leaves the feed material supplier in a legal vacuum and causes issues for enforcement. Some Member States supported the Commission proposal, while others objected and pointed to the impact on the import trade. Member State experts were requested to submit views in writing ahead of the next meeting for further discussion on this point. IGFA will continue to update members and request support once we are clear what action may be required at national and Brussels level.

### Medicated Feed

The EU Expert Animal Nutrition Group held its second meeting on 21 February 2023 to discuss the delegated regulation establishing maximum levels of cross-contamination. This group is composed of members from SCoPAFF – Animal Nutrition, which includes DAFM staff and 5 industry stakeholders (FEFAC, FEFANA, FEDIAF, Animal Health Europe and Copa-Cogeca). The group was set up to advise the EU Commission on the drafting of delegated acts related to the feed legislation. FEFAC also set up a medicated feed taskforce in 2021 and IGFA contributes to the discussions on behalf of members.



IGFA has prepared a summary briefing to update medicated feed members on the current status of the discussions. Also included in the briefing is information on the discussions with DAFM and the next steps. See link to briefing [here](#)

## Feed Additives - Cobalt

The applicant for 3b301, 3b302, 3b303 and 3b305 (Cobalt salts) missed the deadline for submission of a dossier for renewal. Instead, the applicant had to submit a dossier for a completely new authorization. As a result, and in the likely event that the process of authorization of these cobalt additives is not completed within the next 4 months, there is a risk that these additives are no longer authorized as of 15 July 2023. The legislator has also not foreseen the possibility to grant a transition period in case of non-renewal of authorizations.



IGFA is therefore concerned that we will lose 3b301, 3b302, 3b303 and 3b305 (Cobalt salts) and that members using these additives will not be given the opportunity after 15 July 2023 to use up stocks of these feed additives or place on the market stocks of premixtures and compound feed containing these feed additives. This situation is new and we expect it might set a precedent for the management of feed additives whose authorisation will not be renewed. We have therefore asked DAFM to review this situation and provide us views in relation to stocks of these additives and premixtures and compound feed containing them post 15 July 2023. We are also asking for action to be taken to minimise the risk of losing these critical feed additives. See link to briefing sent to DAFM [here](#).

## Feed Additives - Vitamin D3

Discussions are on-going in Brussels on the draft EU Commission proposal for a modification of Decision 2002/994. The objective of this decision was to make it possible again to import vitamin D3 from China after the legal interpretation from EU Commission services that vitamin D3, which used to be imported as chemical product, should be regarded as a product of animal origin and therefore fall under the scope of Decision 2002/994.



We have consulted with some IGFA members and although there are EU sources of material, product from China is also necessary to maintain a stable supply chain. Considering this, an exemption of vitamin D3 from the scope of Decision 2002/994 is essential and must be decided quickly to avoid severe risks of trade disruption and subsequent animal welfare issues. IGFA therefore asked DAFM to vote in favor of the possibility to import and use, in the EU, vitamin D3 and precursors imported from China for use in animal feed via an exemption from Decision 2002/994.

A draft EU Commission proposal for a modification of Decision 2002/994 was scheduled to be voted on at a SCoPAFF meeting on 23 March 2023. There was an issue with the wording of the regulation so the vote was postponed. A new draft has since been issued and if validated quickly by the legal services, could undergo the written voting procedure the week starting 11 April. Otherwise, the next opportunity would be to vote at a SCoPAFF meeting on 25-26 April. IGFA will follow this matter closely.

## MOSH and MOAH

Mineral oil hydrocarbons (MOH) comprise a wide range of chemical compounds obtained mainly from petroleum distillation and refining. MOH can enter food in many ways - through environmental contamination, use of lubricants for machinery, release agents, processing aids, food or feed additives and by migration from food contact materials.

MOHs are categorised into two main groups referred to as MOSH and MOAH.

- MOSH - EFSA experts have provisionally concluded that mineral oil saturated hydrocarbons (MOSH) do not pose a health concern. The highest levels of MOH were found in vegetable oils and the highest exposure was estimated for young people, especially infants fed exclusively with infant formula containing high levels of MOSH. EFSA experts therefore consider it important to keep studying the possible long-term effects on human health.
- MOAH - EFSA confirmed that some substances in the group known as mineral oil aromatic hydrocarbons (MOAH) are a possible health concern. Experts looked at two different types of MOAH, concluding for one that it may contain genotoxic substances that can damage DNA in cells and may cause cancer. For genotoxins like these, it is therefore not possible to establish a safe level. The experts have recommended that more research needs to be completed in order to quantify the presence of MOAH in food. They have recommended further data collection in order to better assess the risks posed by these chemicals.

IGFA Members may receive questions from customers on the possible presence of MOSH and MOAH in feed. Please let us know if any concerns are raised and we will coordinate with DAFM feedstuff section to ensure the issue is addressed.