

General News

Brexit - Introduction of Border Control

On 5 April the UK published its draft [Target Operating Model \(TOM\) guidance](#). It outlines the UK's new model for imports and the timeline for the introduction of the proposed changes. The three major milestones are

31 Oct 2023	The introduction of health certification on imports of medium-risk animal products, plants, plant products, and high-risk food and feed of non-animal origin from the EU. Full customs controls for goods imported from Ireland i.e. import declarations for goods arriving from Ireland by RoRo ferry must be pre-logged before leaving Ireland.
31 Jan 2024	The introduction of documentary and risk-based identity and physical checks on medium-risk animal products, plants, plant products, and high-risk food and feed of non-animal origin from the EU. At this point, imports of Sanitary and Phytosanitary goods from the rest of the world will begin to benefit from the Target Operating Model. Existing inspections of high-risk plants/plant products from the EU will move from destination to BCPs.
31 Oct 2024	Safety and Security declarations for EU imports will come into force on 31 October 2024. The UK will introduce a reduced dataset for imports and the use of the UK Single Trade Window will remove duplication where possible across different pre-arrival datasets – such as Safety and Security, Sanitary and Phytosanitary, and pre-logged customs declarations.

These changes do not impact the existing export requirements for goods exported IE-GB. For any further queries or questions about the draft Border Target Operating Model, contact border.enquiries@cabinetoffice.gov.uk.

Ukraine Imports – Measures to Reduce Impact on EU Market

The Governments of Poland, Hungary, Bulgaria, Romania and Slovakia wrote to the Commission President at the end of March calling for measures to deal with the negative impacts of increased imports from Ukraine on the EU market. The letter noted the severe market disturbances in those countries close to, or bordering, Ukraine and highlighted the huge increase in products including grain, oilseeds, eggs and poultry on national markets. Farmer protests in these countries continued to put pressure on national governments and farming organisations emphasised that significant and sustained quantities of imports from Ukraine are getting 'stuck' on their markets and depressing national prices. The Polish Agriculture Minister resigned on April 5 with some media linking his resignation to a lack of EU action on the issue.

In mid-April unilateral decisions were taken in Poland, Hungary and Slovakia to impose a temporary ban on Ukrainian grain and food imports, applicable with immediate effect until the end of June 2023. This was for both 'in transit' and local deliveries and official statements justified the decision on the basis undue market distortions for local grain farmers. The EU Commission warned that trade policy is an EU exclusive competence. It said that unilateral actions were unacceptable in such challenging times.

Discussions and negotiations intensified throughout April with the aim of easing the situation for Bulgaria, Hungary, Slovakia, Poland and Romania while at the same time maintaining EU support for Ukraine. At the end of the month two measures were agreed. The first is increased financial support of €100m to farmers in these Member

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RASFF 'S APRIL 2023

TOTAL FOOD & FEED	304
TOTAL FEED	23
FEED MATERIALS	14
PET FOOD	5
COMPOUND FEED	2
PREMIXTURES	2
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States affected by the increased imports from Ukraine. The support will come from the EU agricultural reserve and could be complemented by national top-ups of up to 200%. The second is an exceptional and temporary 'preventative measure' on imports of wheat, maize, rapeseed and sunflower seed into these member states from Ukraine. However, these products can continue to be released for free circulation in all the Member States of the EU other than Bulgaria, Hungary, Poland, Romania and Slovakia. The products can continue to circulate in or transit via these five Member States by means of a common customs transit procedure or go to a country or territory outside the EU. In parallel, Bulgaria, Hungary, Poland and Slovakia have committed to lift their unilateral measures on these and any other products coming from Ukraine.

The measure will apply from 2 May until 5 June 2023 and the Commission plans to undertake further sensitivity investigations for other Ukrainian products such as sunflower oil and poultry meat.

EU Agri-Food Sector 2022 Trade Data

The EU traded €401.5bn of agri-food products with the rest of the world in 2022, according to the latest consolidated trade data by Eurostat. The trade balance for 2022 amounted to €58bn, with exports valued at €229.8bn and imports at €171.8 bn (the surplus was mainly due to higher exports to non-EU countries such as China, the US and Japan).

However, the EU net trade balance decreased by €10bn due to an increase in the prices of primary agricultural commodities, notably coffee and soya meals. The UK, the US and China were the top three destinations for EU exports, with exports to the UK reaching €47.8 bn, followed by the US with €28.9 bn and China with €15.6bn.

EU agri-food imports increased by 32% in value terms in 2022, reaching €172 bn. Brazil remains the first import source for the EU, representing 12% of total EU imports (EU imports from Brazil increased by 49% compared to 2021, largely due to an increase in global prices), while the UK ranks second with 9% of EU imports in 2022. EU imports from Ukraine increased by 88% in 2022 compared to 2021 and reached €13bn, representing 8% of total EU agri-food imports. The increase came mainly from cereals imports (+€2.8 bn, reaching €4.6 bn) as well as oilseeds and protein crops (+€1.9 bn, reaching €3.6 bn). The rise of EU imports has been driven by both bigger imported volumes and higher import unit values. Regarding cereals, maize and wheat imports increased by more than 50% (in volume terms). The top imported products of the EU in 2022 were oilseeds and protein crops, fruit and nuts, coffee, tea, cocoa, spices, and cereals. Soya beans and meals remain the top imported products, reaching 14 million t (-4% year-to-year) and 16.9 million t (+3%), respectively.

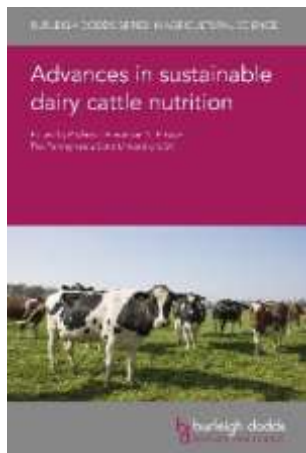
Therefore despite interruptions, DG TRADE noted that the EU agri-food trade functioned well and the success is thanks to quality and competitive products and the broad network of trade relations and agreements which allows diversification.

Michael Scannell Retires

Michael Scannell, DG AGRI Deputy Director General, retired at the end of April after many years working on EU agricultural policy. Originally from Kerry, the highly regarded official spoke at the 2013 IGFA Annual Dinner when he was Director of the Food and Veterinary Office in Grange, Co Meath. More recently he was a valued Commission voice on market issues and a regular speaker at FEFAC events on feed related policy. IGFA would like to thank him and wish him all the best for the future.

Environment News

Advances in Sustainable Dairy Cattle Nutrition



Global demand for milk and other dairy products continues to grow. As a result of this increased consumer demand, the sector's GHG emissions have risen dramatically. It is therefore crucial that the livestock sector reacts to these developments and considers areas for improvement that could reduce the sector's contribution to climate change.

Advances in sustainable dairy cattle nutrition's recent publication provides a comprehensive review of research on recent advances in understanding and improving dairy cattle nutrition to reduce the carbon footprint of the dairy sector. It explores the role of nutritional requirements in optimising gut function and overall animal health, as well as its influence on milk yield and quality. It also reviews the use of dietary supplements, such as plant extracts and direct-fed microbials (DFM) to optimise dairy cattle nutrition.

Find out more [here](#).

Animal Health

Avian Influenza Update

The requirement to confine/house poultry and other birds as a precautionary measure against avian influenza was lifted on 18 April 2023. Biosecurity measures however remain in force. All flock owners intending to allow birds to have outdoor access from 18 April 2023 must take action now to ensure those areas conform to best biosecurity practices. Farmers are urged to remain vigilant and maintain strict biosecurity. For more information see the DAFM bulletin of 13 April 2023 [here](#).

Technical News

New Online Feed Additives Register

On 4 April 2023 the Commission launched the new online EU register of feed additives. This replaces the previous PDF format which will no longer be accessible. The current version is up to date until 27 March 2023 and will be continuously updated from now on.

As part of this 'revamp' the commission has ambitions to improve the tool and has invited EU organisations to collect comments on the content (inaccuracies), the structure, the workability of the interface, the search tool, etc. Although there will be some technical limitations to what can be done, IGFA will be providing feedback to the commission through FEFAC. The new online Feed Additives Register can be accessed via the IGFA regulations page <https://igfa.ie/feed-safety-and-regulations/>

Click to access current EU Feed Additives Register

Feed Additives - Cobalt



As noted in our March Feed issues the submission of a dossier for renewal for 3b301, 3b302, 3b303, and 3b305 (Cobalt salts) missed the deadline. The applicant, therefore, had to submit a dossier for a completely new authorisation which could mean it would not be legal to use these additives from 15 July 2023 until approved, which could be 2 years. The current situation is that the applicant for the 4 cobalt salts has asked the Commission to activate Article 15 (urgent temporary authorisation for welfare reasons) and the EU Commission is willing to consider this option. To support this, FEFAC (with input from IGFA) sent a letter to the Director General DG SANTE with justifications including that the non-renewal of authorisation will dramatically impact ruminants, which rely on complementary feed in the form of a bolus, drenches, or liquid for their

supply of cobalt, to avoid critical deficiencies, in particular for those animals grazing on soil low in cobalt. For technical reasons, coated granulated Cobalt(II) carbonate (ID number 3b304) cannot be used in the formulation of feed delivered in these forms.

Cobalt deficiencies have been highlighted by Teagasc in Irish soils and info can be found on [Cobalt - Teagasc | Agriculture and Food Development Authority](#). IGFA has also been in constant contact with DAFM and we hope that if the way is well paved with national authorities, a vote in favour of urgent authorisation, could take place at the SCoPAFF on 4-5 July. We have also provided DAFM with statistics on the potential number of animals that would be affected, so they are well briefed before the May SCoPAFF meeting. FEFAC has been in contact with the applicant and provided information to support the preparation of the dossier.



Feed Additives - Vitamin D3

As highlighted in the IGFA March Feed Issues, discussions were ongoing in Brussels on access to vitamin D3 from China after a legal interpretation from EU Commission services that vitamin D3, which used to be imported as a chemical product, should be regarded as a product of animal origin and therefore fall under the scope of Decision 2002/994. IGFA and FEFAC have highlighted that although there are EU sources of the material, product from China is necessary to maintain a stable supply chain. We have therefore been lobbying for the possibility to import and use vitamin D3 via an exemption from Decision 2002/994 to ensure access to the product and to avoid severe risks of trade disruption and subsequent animal welfare issues.



We were advised on 26 April that the SCoPAFF has now approved a revised proposal for modification. This is the first step in resuming Chinese imports but a key condition is that the imports are performed in accordance with the ABP legislation.

Official Controls

Regulation (EU) 2017/625 Official Controls Regulation (OFC) entered into force in April 2017 and started to apply on 14 December 2019. It covers Competent authority's (DAFM) official controls and other official activities. DG SANTE has now released version 1.0 of their guidance on the implementation of this regulation. This first version addresses issues such as the calculation of fees, the right for a second expert opinion, or the delegation of powers. They have now started working on version 2.0, with guidance on other issues. Upon their invitation, FEFAC suggested that the second version should include guidance on the recognition of auto-controls and feed safety assurance schemes in the design of monitoring control plans.

The EU Commission is also reviewing Regulation (EC) No 152/2009 on the methods of sampling and analysis. One provision under consideration requires that *"If the analytical result of the sample taken for second expert opinion exceeds the maximum content (without taking into account the expanded analytical measurement uncertainty), this confirms the noncompliance established with the control sample, in the absence of specific national rules on this"*. At the recent FEFAC feed safety committee meeting attended by IGFA, it was asked if microbiological incidents were permitted a second opinion and FEFAC informed that the EU Commission had indicated that Recital 48 of OFC **does permit** a second opinion for microbiological positives.

Pesticides MRLs and the Footnote

In IGFA March Feed Issues we advised of the possible deletion of footnote 1 of Regulation 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. At the recent FEFAC feed safety committee meeting attended by IGFA, it was agreed to support the suggestion that if the footnote was removed, then a possible solution was to include a list based on the CODEX list of feed-only products (so-called class C products) including processed and unprocessed products based on similar principles. In addition, the removal of the footnote does not negate the need for authorities to respect article 15 of [General Food Law \(EC\) No 178/2002](#) "Feed safety requirements" and base their final decisions on a safety risk assessment. FEFAC will continue to work with FEEDIOL and COCERAL on this topic.

Feed Chain Vulnerability/Fraud

The recent discovery of ammonium sulphate in a consignment of fishmeal ammonium sulphate has generated discussion on the lack of information we receive from the EU Commission on such incidents. The view from the Commission was that the situation could be simply cross-contamination. However, the industry remain in the dark even though they may have safety concerns about the levels of contamination. It may be wise for all feed businesses, as part of your raw material supplier approval process, to undertake a quick assessment of feed materials/minor ingredients that may be exposed more than others to the risk of fraud. A useful tool to help with this exercise is the detailed assessment for feed materials by Securefeed: [Risk classification of feed | SecureFeed](#)

Per- and Poly-Fluoroalkylated Substances (PFAS) and the Feed Chain

PFAS are a group of man-made chemicals that can be found in a variety of products including cleaning products, water-resistant fabrics, nonstick cookware, and personal care products. In February 2023, the European Chemical Agency (ECHA) published a restriction proposal for the production, use and import of PFAS ([available here](#)). It aims to reduce PFAS emissions into the environment and make products and processes safer for people. In March 2023 the ECHA invited interested parties to send in scientific and technical information on the manufacture, placing on the market, and use of PFAS by September 2023. The ECHA plans to use this information to evaluate the proposed restriction and decide the next steps.

In March 2023 the Danish Technical Institute (DTU) published a report linking the detection of PFAS in organic eggs to the use of fishmeal as feed. Once the fishmeal was removed the eggs tested clear for PFAS. The EU Commission informed member states authorities that they intend to adopt by at least June 2023 a recommendation for the monitoring of the four main PFAS (PFOS, PFOA, PFNA and PFHxS) in forages, feed materials of marine origin, seaweed, mineral feed materials such as bentonite as well as tuber and roots and their derivatives. The monitoring will also cover compound feed containing these feed materials.

Evidence so far is indicating that PFAS are migrating up the food chain from water, air and soil contamination. The official monitoring by Member States should shed further light on the extent of the issue and provide indication as to the best ways of reducing the risk to the consumer. The monitoring will take place between 2024 and 2026. At the end of 2024, the EU Commission intends to initiate discussions based on the first monitoring results to evaluate the need to set maximum limits, which, if deemed necessary, could be set in 2026.