

## General News

### The Irish Grain Assurance Scheme (IGAS) has achieved a Gold Award!



The Sustainable Agriculture Initiative (SAI) Platform is a global organisation that works to advance sustainable agricultural practices. It runs the Farm Sustainability Assessment (FSA) tool which allows national programmes to be assessed and benchmarked against international standards and claim a level of performance. IGAS achieved a Silver Award in this process in 2018 and has now been awarded Gold.

To achieve this result, the IGAS standard was evaluated and measures on conservation and habitat management, waste management, prevention of crop residues to landfill, sustainable energy acquisition and greenhouse gas emissions reductions were reviewed and updated.

IGAS is the first Grain Assurance Scheme in the world to achieve the Gold standard and this wonderful achievement was welcomed by Irish food, drink and feed companies at an event in Dublin on 20<sup>th</sup> June.

### Ukraine Russian War - 11<sup>th</sup> Package of Sanctions

On 23 June the European Commission adopted the 11<sup>th</sup> package of sanctions against Russia. The latest EU sanctions package does not directly target or impact agriculture or the trade of agricultural and food products. The Key elements of this package are trade, transport, and energy. The most relevant to our sector is the transport section. For the full list of measures see [here](#).

### Black Sea Grain Initiative Update

In mid-June the UN Coordinator for the Black Sea Grain Initiative released an update on the progress and challenges faced by the initiative. Key highlights below

- **Exports** - To date, a total of 31,902,478 metric tonnes (MT) of grain and foodstuffs have been exported under the Initiative. This includes 625,169 MT of grain shipped on vessels chartered by the World Food Programme (WFP) to support humanitarian operations in Afghanistan, Ethiopia, Kenya, Somalia, Sudan, and Yemen. In 2022, Ukraine supplied more than half of WFP's global wheat grain procurement, a trend that continued in 2023. However, the volume of food exported in May (1 327 342 metric tonnes, – 52%) was the lowest since the start of the Initiative, falling below shipping demand and Ukraine's export capacity.
- **Fertilisers** - The Initiative also allows for the export of fertilizer, including ammonia. However, there have been no such exports thus far due to the halt in the ammonia pipeline from the Russian Federation to the Ukrainian port of Yuzhny/Pivdenni caused by the ongoing conflict. Recent reports indicate damages to the pipeline on 5 June, further delaying ammonia exports.
- **Safety** - So far 1,940 voyages in and out of the corridor have been facilitated. There have been four instances where vessels reported safety concerns, but these were promptly reviewed and addressed.
- **Inspections** - The average time for a completed inspection has lengthened from 2 hours and 32 minutes in March to 3 hours and 27 minutes in May. Lengthy

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#### RASFF 'S JUNE 2023

TOTAL FOOD & FEED	408
TOTAL FEED	31
FEED MATERIALS	21
PET FOOD	3
COMPOUND FEED	3
FEED ADDITIVES	1
NUTS, AND SEEDS	1
ANIMAL BY PRODUCTS	2

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inspections have become more common, with over half taking more than three hours in May.

## UK Border Target Operating Model (BTOM)

The new UK Border Operating model (BTOM) under development by UK authorities aims to deliver a global, simplified, risk-based system of biosecurity controls at the UK borders for imports of product of animal origin and plants. The UK health certificates have been streamlined but are comparable to the EU system. The UK certificate is reduced to only four pages. The reference annexes are linked to the form to better facilitate the certifying officer when completing the Certificate. EU based FBOs exporting animal or plant products to the UK will need to be registered on the EU traces system. The risk-based biosecurity checks are centred on the origin of the goods and the type of goods being imported. Products have been categorised into high, medium and low risk by HS codes.

Industry is encouraged to check their commodities on the UK Government website. Once you enter the 10-digit HS code for your product, the website will provide information as to the need for prenotification, health certificates and inspection requirement for each commodity [link here](#). The first changes to the system will commence in 31 October 2023. High risk product will need to pre notify in IPAFFS, complete a UK Health certificate and present for inspection at a Border. Control Point. (BCP). High risk product will no longer be permitted inspections at final destination points. Medium Risk products will be required to pre-notify on IPAFFS and complete a health certificate. Low risk product will be required to pre-notify on IPAFF. Inspections and charging will commence at the BCPs on 31 January 2024.

### Further info

DAFM held a webinar explaining the new requirements on 21 June 2023. This can be rewatched [here](#). The UK government has also launched a consultation on charges for using the government controlled BCPs. The consultation will be open until 9 July 2023. A link to the consultation documents and on-line survey can be found below [here](#).

## Busy Schedule for Spain over coming 6 Months

The Spanish took over the rotating presidency of the EU from Sweden on 1 July. Their agenda on agriculture will include the EU-Mercosur trade deal and corporate sustainability due diligence. They also plan to look at ways to diversify the EU's supply of critical raw materials away from China, which currently dominates the market.

The Spanish will also be kept busy with the highly anticipated 'Food & Biodiversity Package' due on 5 July. The package will contain a proposal for a Regulation on plants produced by New Genomic Techniques, a proposal for a Directive on Soil Health, the revision of legislation on seeds and other plants and forest reproductive material and revision of food waste aspects of the EU Waste Framework Directive. The diversity and profile of the issues contained in the package guarantees that it will be the topic of much debate and discussion over the coming months.

# Environment News

## Sustainable Soy Webinar

Bord Bia hosted a webinar in the middle of June with the aim of giving an overview of latest developments on the Sustainable Soy discussion and information on the upcoming EU Deforestation Regulation. The webinar kicked off with a presentation on the current situation in Ireland and with details of the [report](#) done in partnership with IGFA on the soy present in Irish Supply Chains. DAFM then gave an overview of the changes that will be introduced under the recently agreed EU Regulation which aims to stop the import of products into the EU that might be associated with deforestation. John Colman, Chairman of the IGFA Feed Committee, joined a panel of industry stakeholders to discuss the developing needs of the Irish market and the sourcing of sustainable soy products. A link to the recording is available [here](#) and you can also view the full [presentations](#).

The Commission has published a [FAQs document](#) on the Deforestation Regulation to provide information to all stakeholders on the implementation of the Regulation.

## New EU Protein Strategy due early 2024

FEFAC held it's Congress in Ystad, Sweden in June where the Commission gave an update on its plans for a 'Report on Plant Proteins for a Sustainable Food System'. The report is due by the end of Q1 2024 and will be an update/review of the 2018 report on the development of plant proteins in the EU. It will look at supply and demand for both food and feed and at opportunities for developing plant based and alternative proteins. EU dependency on imports will be a key topic as will the potential to diversify the protein sources used in livestock production.

## Carbon Border Adjustment Mechanism (CBAM)

EU Regulation (EU) 2023/956 established CBAM on 10 June 2023. The products impacted are – Iron, steel, aluminium, cement, electricity, hydrogen and for our sector, fertiliser. CBAM puts a price on the carbon emitted during the production of carbon intensive goods that are entering the EU to encourage cleaner industrial production in non-EU countries and prevent “carbon leakage”. The aim is to encourage low carbon production in third countries and to provide a level playing field for EU industry subject to stringent low carbon production systems. The transitional period is a learning phase for all and traders will submit their first reports to customs in January 2024. After the transition phase importers will be required to pay a price for the embedded carbon in the imported product (expected 2026 onwards).

## Technical News

### Feed Additives - Cobalt

The request for urgent authorization of Cobalt (II) acetate tetrahydrate, Cobalt (II) carbonate, Cobalt (II) carbonate hydroxide (2:3) monohydrate and Cobalt (II) sulphate heptahydrate as feed additives was discussed at the meeting of the SCoPAFF Working Group on 12-14 June 2023. From the information reported to FEFAC, the proposal is now supported by a very large majority of Member States and may even be put on the agenda of the SCoPAFF meeting of 4-5 July 2023 for a vote. This time window is very short so the vote might therefore be postponed to the next meeting on 5-6 October 2023. In any case, the legal act granting this urgent, temporary authorization **will not** be published before 15 July 2023 (the expiry date of the renewal of authorization of these cobalt salts).



DAFM has advised us that as there is an urgent authorisation in process, Ireland will allow the product to remain on the market after 15 July 2023 if this new urgent authorisation is not finalised by that date.

### Feed Additives - Levucell SC

Concerns were raised by some members of the IGFA feed committee in December 2022 that they could lose access to the feed additive Levucell SC for dairy cows. IGFA prepared a paper with input from the manufacturer and technical experts from the Association. This briefing was submitted to DAFM feeding stuff staff who reviewed the data and information. After many further conversations with IGFA staff, DAFM agreed to vote in support of the re- authorisation of Levucell.

We were therefore very pleased when a vote was taken at the SCOPAFF meeting in early May and the authorisation of Levucell SC in dairy cows was granted. The Regulation to authorize Levucell SC was published on Friday 16 June 2023 in the EU Official Journal. We are grateful for the support of DAFM and IGFA technical experts on this issue.

### A Possible Ban on Anticoagulants to Control Mice

All active substances intended for use as a biocidal product must be reviewed at EU level under Regulation (EU) No 528/2012. The EU approval process of an active substance involves the submission of an extensive technical and scientific dossier by the substance manufacturer, an evaluation by a Competent Authority (CA), the drafting of a Competent Authority Report (CAR) based on the data and a recommendation on whether to approve or not the active substance. The CAR is then subjected to a detailed peer review by experts. After this the EU Commission proposes an Implementing Regulation on the approval or non-approval of the substance which in turn must be accepted and voted on by the Standing Committee for Biocidal Products (SCBP).

The SCBP will discuss an opinion and possible ban on the use of Anticoagulants for the control of mice at the June meeting with the objective of voting in September 2023. The feed and food industry associations have become concerned that restricting access to anticoagulants for the control of mice from July 2024 could have a serious impact on infestations in feed and food premises. It is evident from industry experience and the expert opinion that we need a wide range of controls and that mechanical trapping alone is not sufficient to deal with these types of pests.

IGFA has raised industry concerns with the DAFM Biocide and the Feeding Stuff sections ahead of the discussion and vote.

### Premixtures Webinar - 11 July 2023

Annex VIII of Regulation 1272/2008 on classification, labelling and packaging of hazardous substances and products foresees that, from 1 January 2024, mixtures classified as hazardous for Physical and Health hazards should be subject to a new format of mandatory notification to poison centres. This would affect around  $\frac{2}{3}$  of the types of premixtures produced in the EU. To help premixture producers prepare for this new legal requirement, FEFAC representing European feed

manufacturers joined forces with FEFANA, representing European feed additive and premixture manufacturers and organised a webinar to share best practices.

The workshop will take place on 11 July from 14.00 to 15h30. Contact [cornelia.oconnell@eorna.ie](mailto:cornelia.oconnell@eorna.ie) if you wish to attend or wish to receive a recording.

## Other News

### Medicated Feed - Reminder of Important Dates

**16 Feb 2023** - IGFA consulted with members on carryover including the possibility/feasibility of separate production lines. Information was fed back to FEFAC who represented the industry at the expert meeting. IGFA also provided industry views to the Veterinary Medicine section of DAFM.

**21 February 2023** - EU Expert Animal Nutrition Group held a meeting on the drafting of delegated acts related to carry over into non-medicated feed. Different carryover options were put on the table.

**24 March 2023** - IGFA briefing summarizing positions sent to all medicated feed members and available [here](#).

**06 June 2023** - The decision regarding the way forward for the setting of maximum limits for antibiotics in non-target feed is still in the hands of the DG SANTE hierarchy.

**31 May 2023** - The legislation to introduce the new NVPS and to make it mandatory for all veterinary prescriptions was passed in the Dáil. The legislation must now travel through the Seanad and Secondary legislation to allow for changes to the prescribing of antiparasitics will need to be finalised and agreed with all stakeholders.

**Q4 2023** - The NVPS system will be mandatory.

## Members FAQs

### Labelling Rules - Feed Composition Declaration

Do I need to declare the % composition of feed materials on the feed label? No, unless you make particular reference to the feed material e.g., High Wheat Dairy Feed. For more details see [EC 767/2009](#) and scroll to Article 17, paragraph 2.

*This position was agreed on foot of the [European Court of Justice case](#) taken by the feed industry to protect their IP. All member state authorities supported the position of the feed industry that % labelling was not a requirement on labels. The industry's position was also supported by the European Farmers' Organisation.*

If I want to declare the % of the feed materials on the label, are there any rules I must follow? It is recommended to use a range of +/- 15% of the actual value so as to grant sufficient know-how protection while ensuring a comprehensive and meaningful flow of product information to the purchasers. Reference FEFAC Labelling code of practice endorsed by EU Commission, see [link](#)

### Analytical results – measurement of uncertainty

Does DAFM consider the measurement of uncertainty when they get an out-of-specification result for my feed? DAFM has advised IGFA that when a result for a heavy metal/undesirable is issued and this result exceeds the maximum permitted level as stated in EU Reg 2002/32, then the measurement of uncertainty is applied to this result and subtracted from the initial result.

What is the measurement of uncertainty figure? The measurement of uncertainty is stated by the laboratory who tests the sample, and thus, may differ between different labs.

Is this the view of all Competent authorities across the EU? Even though [Regulation \(EC\) No 152/2009](#) Annex II part C laying down the methods of sampling and analysis for the official control of feed specifies that results of official analysis should take into account measurement of uncertainty, not all member states allow for measurement of uncertainty.

## Training / Up-Skilling of Feed Manufacturing Staff

Mills have different requirements for training and up-skilling of feed manufacturing staff. Below is a list of the courses, that have been recommended or suggested to IGFA that may be of interest to the general membership.

<https://www.schothorst.nl/en/courses/> Schothorst offers a wide range of courses, focusing on optimising nutrition and sustainability. They encourage physical participation as employees benefit from interaction with other EU professionals. Feed manufacturing and processing courses are offered but only in person.

[ANPRO CAMPUS](#) North Carolina University, Poultry experts. This course gives students the opportunity to increase their knowledge on feed manufacturing. The program is recommended for new employees as part of their introductory training or for employees requiring a deeper understanding of the full process. The course is available online and offline.

[IGP–KSU Feed Manufacturing \(k-state.edu\)](#) Kansas University expert in grain and milling. Kansas University run a wide range of courses on feed manufacturing for students from around the world. They also offer courses with the American Feed Association (AFIA). These are online and self-paced courses.

James Doyle Training - Mill manufacturing introduction and follow up on pelleting with an onsite visit. [jpdmanagement.ie](http://jpdmanagement.ie)

Progressus Agrischool [In-Person Livestock Feed | Agrischools \(progressus.asia\)](#). This consulting group provides a certificate in livestock feed mill management. The course is run over two days and covers, feed mill design and equipment, raw material handling and storage, grinding principles and systems, batching and mixing, cooling, crumb and sieves, liquid applications, moisture management, mill automation and energy optimisation. The course has been run in Asia but the consulting group is interested in running a course for UK/Irish feed mills in the UK. Two of the lecturers Jon Radcliff and Martin Briggs, may be already known to the industry in Ireland. Further details Contact: Yiannis Christodoulou, Managing Director email: [yiannis@progressus.asia](mailto:yiannis@progressus.asia)