

**Trader Notice: ABP No. TN 03/23**  
**Using Cat 3 Animal By-Products and derived products in animal feed.**



CN101 Conditions for approved-registered



AP101 Application for approved-registered



TN03-23 - Registered Feed Bus

On 14 August 2023 members received Trader Notice ABP No. TN 03/23 from DAFM. This notice called on Feed Business Operators to Register **to Use** Animal By-Products as Ingredients if they are using Category 3 Animal By-Products (ABPs) and derived products as feed ingredients. Following this, IGFA had an online meeting with DAFM where we raised a number of queries. See below those queries and responses from DAFM.

**If I have, for example whey powder, lactose, porcine gelatine on my premises for inclusion in animal feed am I obliged to register with DAFM ABP division?**

Yes

**If I have compound feeds containing whey powder, lactose, porcine gelatine on my premises am I obliged to register with DAFM ABP division?**

An end product i.e. compound feed is exempt from ABP regulations. There is therefore no requirement to register with DAFM. However as stated above in Q1 above, feed mills that have e.g. whey, Lactose, porcine gelatine etc for use in a compound feed must register as users of ABP.

**Are vitamins coated in gelatine or vitamin D3 derived from sheep wool lanolin considered ABP and those using them obliged to register with DAFM ABP division?**

Vitamin D from sheep wool lanolin is being excluded at present as being ABP due to the level of processing and there is no requirement to register Vit D3 as an ABP.

Vitamins coated in porcine gelatine, are also being excluded at present as being ABP as porcine gelatine is used in very small amounts to stabilise the Vitamin and the vitamin itself is not listed as a feed ingredient (it's a feed additive). Therefore, there is no requirement to register.

**Should compound feeds containing these vitamins be considered as ABP and therefore result in an obligation to register with DAFM ABP division?**

No. Firstly, these vitamins are not being considered currently by DAFM as ABP and secondly, an end product i.e. compound feed, is exempt from ABP regulations and is dealt with under feed regulations.

**Will registered ABP Feed business operators be listed on a public list?**

Yes, all registered operators will appear on the DAFM website. Current list <https://assets.gov.ie/131372/e0fa4b7b-13de-4ae3-9d92-41854f1784f8.xls>

Approval/Registration No.	Name	Town/Region	Category	Activities	Product Types	Associated Activities	CHAN procedure
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In the column "Product type" the derived ABP can be listed e.g. whey. This is so that anyone viewing the website can immediately see what type of material is being used by the feed business.

**Will this register be on an EU site or Irish website?**

Irish site [gov.ie](http://gov.ie) - [EU Approved ABP Plants \(www.gov.ie\)](http://www.gov.ie)

**Will DAFM be preparing a FAQs explaining why Ireland has suddenly such a huge increase in FBOs registered for inclusion of APB in animal feed**

No, the trader notice has all the details.

**Do Competent Authorities in other EU countries register FBO's for use of similar ingredients?**

Yes, the EU Commission has recently confirmed that as per article 23 of 1069/2009, Feed Business Operators using ABP and derived products are required to be registered.

**Will food companies who, for example, supply bread (which may contain eg. milk) to the feed industry be obliged to register on this list?**

No, under article 23 of EC Reg 1069/2009 food registered businesses that generate Animal By-Products in the course of their business are exempt from registration.

**Will home mixers be expected to be included in this list?**

Yes, if they are using ABP derived products.

**What is the situation for the transport of Category 3 Animal By-Products (ABPs)?**

Category 3 material is required to be transported by a registered ABP transporter and be accompanied by a commercial document. However, compound feed containing ABP derived products is **exempt** from ABP registration for transport and the need for commercial documents during transport.

*Ends*