

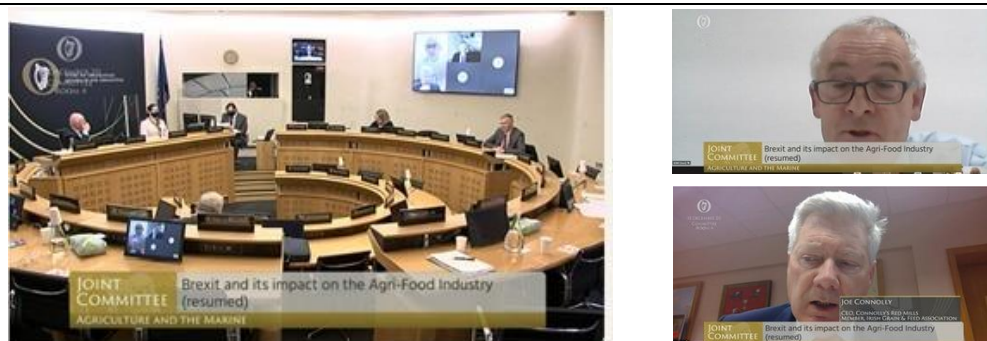
FEED ISSUES

IGFA MONTHLY NEWSLETTER

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Brexit

Pre-Deal IGFA Highlights Impact of Brexit at Oireachtas Committee



The Joint Committee on Agriculture and the Marine questioned witnesses from across the food industry on 'Brexit and its impact on the Agri-Food Industry' at meetings in December. IGFA was asked to attend to give the views of the Irish Feed sector on 15 December and IGFA President Bobby Roche and Joe Connolly answered questions from the Deputies and Senators present. At that time there was still no clarity on whether a deal would be reached and IGFA prepared an [Opening Statement](#) and [Brexit Briefing](#) outlining the huge challenges for our sector and action needed to help members deal with the changes from 1 January 2021.

Minister Welcomes Brexit Deal



The Minister for Agriculture, Food and the Marine, Charlie McConalogue TD, welcomed the announcement of an agreement between the EU and the UK on their future relationship. The Minister welcomed, in particular, the agreed establishment of a trading relationship based on zero tariffs and quota restrictions, while at the same time, pointing to the

more challenging impacts that will arise for the fishing industry as a result of the agreement reached on fishing quotas. The potential for tariffs of up to €2.5 billion on agri-food trade between Ireland and Great Britain had been one of the primary concerns for Government and for stakeholders right across the agri-food sector, so it is welcome that such an outcome has been avoided. The paper work however will be increased as the UK, excluding NI, will now have third country status from 1 Jan 2021.

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WHATS ON

Jan	Teagasc Events
Jan 6	USSEC Conference
Jan 14	UCD Webinar

USEFUL LINKS

IGFA Covid 19	Gov Covid 19
HSE Covid 19	CDC Covid19
Crop Forecast	Irish Fbo's
Protein Balance	Fbo Forms
Oeju	Dafm Brexit
Fsai Amr	Dafm Amr
Compound feed Labelling Code	
Dafm Trader Notices	SCoPAFF
WASDE	NDCC

RASFF Dec 2020

Total Food & Feed	512
Food	471
Food Contact Materials	12
Total Feed	29
Feed Materials	22
Feed Premixtures	0
Feed Additives	0
Compound Feed	1
Nuts, products and seeds	0
Pet food	6

Importing or Exporting Animal Feed into Ireland

Revenue - the Basics

If you're importing or exporting animal feed from outside the EU (e.g., UK excluding Northern Ireland from 1 Jan 2021)

1. You or your agent must complete a customs declaration. This customs declaration must be made electronically using Revenue's new Automated Import System ([AIS](#)).
2. In order to complete the declaration, you will need an EORI number. This number is valid throughout the EU. It is used as a common reference number for interactions with the customs authorities in any Member State. This 4-minute video show you how to get an EORI number <https://youtu.be/HuChbV7mu3c>

In the July Jobs Stimulus package, the Government announced that Enterprise Ireland will manage a new €20m fund to assist Irish business meet this challenge – the **Ready for Customs grant** see [link](#)

DAFM - the Basics

1. Any companies or individuals importing all types of animal feed into the Republic of Ireland from anywhere in the world must register with DAFM as a Feed Business Operator (FBO) and Importer. The form to be completed is available [here](#) and the list of Irish importers is listed [here](#). This has been a requirement since 2005 with the publication of feed hygiene regulation (EC) No 183/2005.
2. If you are importing any animal feed from a third country (from 1 Jan 2021 this includes the UK but excludes Northern Ireland) you must also register with DAFM to become a Third Country Representative or check to see if the third country company you are importing from has a representative already in the EU. The primary role of a Third Country Representative is to ensure that establishments located in Third Countries meet at least equivalent conditions to those laid down for the establishments located in the Member States as per Feed Hygiene rules (183/2005). The Third Country Representative is also required to keep a register of products that the establishments which they represent have put into circulation within the Community. For the purposes of registering as a Third Country Representative in Ireland, it is a requirement of the DAFM that the Third Country Representative must have an actual presence in the State rather than a simple postal address. This is to ensure that adequate inspection/documentary checks can be carried out under the relevant feed hygiene legislation.
3. Imports of all animal feed from third countries must be notified to DAFM before the animal feed is brought into the State including the nature and quantity of animal feed, the place where it is intended to bring the animal feed and the date and time that the animal feed is to be brought into the State. This notification must be done by completing this [form](#) and emailing it to feedimports@agriculture.gov.ie
4. If your feed products are listed in Regulation [\(EU\) 2019/1793](#) they are categorised as high risk for a contaminant and will be subject to a temporary increase in official controls and emergency measures before entry into the Union from certain third countries. The goods will enter into Ireland through one of the border control points. The only items of relevance to feed on this list currently are Groundnuts (peanuts), otherwise prepared or preserved.

Note: DAFM also endeavours to maintain an accurate database of imports from other EU Member States for the purposes of risk assessment in performing official controls and to ensure that this information is available in the event of a serious feed incident. In this regard, the following categories of imports from within the EU must also be notified to DAFM: Feed materials from the EU; and Compound feed containing fish meal and/or blood products from all EU Member States.

Importing Animal Feed Containing PAO into Ireland – Additional Controls

To protect human health, animal health and the environment, EU rules restrict the import of certain goods from third countries – for example, live animals and products of animal origin.

1. Check to see if your products come under this category by checking the list of products on Annex 1 of [\(EU\) 2019/2007](#). In summary these are all animal feed containing Products of Animal Origin (PAO), with a couple of exceptions i.e., those products falling under 2309 90 20 and 2309 90 91
2. If you are still unsure if your products come under this Annex contact Brexitcall@agriculture.gov.ie.

3. Register with the DAFM as a feed business importer. The form to be completed is available [here](#) and the list of Irish importers is listed [here](#). You may already be listed.
4. Register with the Trade Control and Expert System (TRACES). This is the European Commission's online platform for the electronic completion of documentation required for imports of consignments from third countries and certain intra-community trade movements. Click [here](#) for information on how to register with TRACES.
5. Check also on TRACES that the exporter is approved by the EU to export the category of product required by you.
6. Ensure pre-notification of imports of live animals and animal products are submitted before the consignment arrives at the point of entry.
7. The person responsible for importing the consignment is also required to submit copies of the relevant health certificates and any other documentation required by EU legislation to an electronic mailbox at the same time as the TRACES document is completed.

DAFM have run numerous webinars over the last few weeks including training on how to use TRACES. All of the training sessions have been recorded and are available [here](#). This [link](#) will bring you directly to a tutorial on how to import animals and animal products after Brexit.

Exporting Animal Feed Containing PAO to the UK from Ireland

Requirements for health certificates for imports of animals and animal products into GB will be introduced in phases from January to July 2021. Health certificates for imports to GB will be substantially the same as existing EU certificates for imports from the rest of the world.

GB importers will need to use the UK's new [Import of Products, Animals, Food and Feed System \(IPAFFS\)](#) for imports of:

- live animals
- products of animal origin (PAOs) subject to veterinary checks
- high-risk food and feed not of non-animal origin
- germplasm (also called germinal products)
- animal by-products (ABPs) not intended for human consumption subject to veterinary checks

You must continue to import high-risk food or feed of non-animal origin into the UK through a border control post (BCP), previously called a border inspection post (BIP) or designated point of entry (DPE). Click [here](#) for more details.

As outlined check to see if your products come under this category by checking the list of products on Annex 1 of [\(EU\) 2019/2007](#).

Exporting Animal Feed to the UK from Ireland

DAFM issued a [trader notice](#) on 17 December 2020 advising on importing animal feed into the UK from the Republic of Ireland. According to the trader notice feed businesses from outside the UK which export feed products to GB, must have a third country representative established in GB. This is for the types of animal feed below

1. manufacturers of certain feed additives
2. manufacturers of certain novel protein source products
3. manufacturers of premixtures containing certain feed additives
4. compound feed manufacturers that incorporate the products mentioned above

Feed additives typically include:

- trace elements
- vitamins
- carotenoids and xanthophylls
- micro-organisms and enzymes

-
- antioxidants with a maximum permitted level
 - other additives with a maximum permitted level, not included in the above categories
 - coccidiostats and histomonostats
-

Certain novel protein sources include:

- proteins obtained from micro-organisms belonging to the group of bacteria
 - yeasts (except yeasts cultivated on substrates of animal or vegetable origin), algae and
 - lower fungi
 - co-products of the manufacture of amino acids by fermentation
 - amino acids and their salts
 - hydroxy analogues of amino acids
-

Third Country Representative – Great Britain (GB)

A GB third country representative must

1. be a feed business operator located in GB and registered (or in the process of registering) with their local authority
2. keep a register of all relevant products (for which they act as a GB representative) that the establishment has put into circulation within GB
3. make a declaration that the exporting establishment complies with requirements, at least equivalent to those laid down in retained EU law, relevant to the activity. These requirements include certain conditions relating to hygiene and quality standards in relation to:
 - equipment
 - facilities
 - storage
 - personnel
 - record keeping

The requirements for a representative based in Northern Ireland will be the same as those set out above for a GB Representative in Great Britain; except registration will be with DAERA rather than the local authority. The same application form can be used; and submitted to the same email address.

For feed additives, compound feeds and premixtures not consisting of, or not containing coccidiostats or histomonostats all you need to do is complete this declaration form (https://www.food.gov.uk/sites/default/files/media/document/gb_representation_declaration.docx) and email it to feeddelivery@food.gov.uk

Upon submitting a declaration, the FSA will provide the declarant with an acknowledgement confirming that the declaration has been received. The information provided in the declaration will be shared with the local authority of the GB representative. Your name and details, along with those of the business you are representing, will be included on a list published on the FSA website.

For feed additives, compound feeds and premixtures that contain coccidiostats or histomonostats, feed businesses should contact the [Veterinary Medicines Directorate \(VMD\)](#).

Useful link to [UK Third Country Representative Chart](#)

DAFM - 'Daily Stakeholder Brexit Report'.

As part of the preparation for the new trading arrangements with GB that will come into force from 1 January 2021 the DAFM will be compiling daily reports reflecting any Brexit related issues that arise for the agri-food and fisheries sector. As such, the Brexit Division is asking you to notify them of any issues of significance that impact your business area. The details should be emailed to Brexit@agriculture.gov.ie by 4pm each day with the subject line 'Daily Stakeholder Brexit Report'. Where no emails have been received the Department will assume that no important issues have arisen.

DAFM can be contacted at Brexitcall@agriculture.gov.ie for assistance with specific queries. This email address is being monitored between the hours of 08.00 and 19.00, seven days a week. They can also be contacted at (076)106 4443 on a 24-hour basis. However, they have asked before contacting them outside of regular working hours, please check whether the info that you need is available on their [Brexit page](#). This contains a range of detailed information including Brexit checklist, recorded webinars, 'how to' guides etc.

If you have a query in relation to a specific import consignment please contact the Border Control Post to which you/they are importing

- ✓ Dublin Port BCP can be contacted at (01) 615 7792 or BCP.DubPort@agriculture.gov.ie
- ✓ Rosslare Euro Port BCP can be contacted at (053) 911 4157 or RosslareBCP@agriculture.gov.ie
- ✓ Dublin Airport BCP can be contacted at (01) 615 7650 or BCP.DublinAirport@agriculture.gov.ie

General News

DAFM Website

The DAFM website has been moved to Gov.ie See [link](#). The links to trader notices, feed business operator lists and forms have been updated on this feed issues under in the [USEFEUL LINKS](#) section.

The old web site is still available [here](#)

Ag Climatise – A Roadmap towards climate neutrality

DAFM recently published '[Ag Climatise – A Roadmap towards climate neutrality](#)' designed to help Agri stakeholders work towards tackling climate change and air pollution. The Roadmap outlines 29 specific actions that are "based on stabilising methane emissions and a significant reduction in fertiliser related nitrous oxide emissions...". Significantly the document highlights that "Any increase in biogenic methane emissions from continually increasing livestock numbers will put the achievement of this target in doubt".

Many of the 29 actions are of interest but some are particularly relevant to the feed sector including;

- Action 4 on maximising production of grazed grass
- Action 6 on reducing the crude protein content of livestock feeding stuffs to minimise ammonia loss
- Action 7 on continuing to invest in novel feed additives to reduce biogenic methane
- Action 8 on increasing the proportion of home-grown protein in livestock rations
- Action 10 on increasing the area under tillage production above the current area of 300,000 hectares by 2030, producing more native grown grains and legumes for the livestock industry. Under this action the roadmap says that consideration should be given to aligning IGAS with Bord Bia's Quality Assurance Schemes in order to encourage end users to source certified sustainable cereals.
- Action 12 on promoting the development of a sustainable circular bioeconomy
- Action 22 on developing a continued professional development strategy for all advisors

An IGFA summary of the document can be found [here](#).

Nitrates Action Programme

The consultation phase for the next Nitrates Action Programme has commenced. The closing date for submissions is 15th January 2021. Information on the consultation and the consultation document can be located at: <https://www.housing.gov.ie/water/water-quality/nitrates/ministers-obrien-and-mcconologue-launch-public-consultation-irelands>

Views on Sustainable Food

The latest Eurobarometer report, '[Making our food fit for the future – Citizens expectations](#)', was published in December. The report is based on an EU wide survey of citizens views with the aim of understanding what factors influence their food buying and eating habits and what they believe constitutes 'sustainability'. The survey also aims to provide further insights into what would help citizens adopt a healthy, sustainable diet to inform the EU Farm to Fork Strategy on sustainable food systems. It is interesting that when respondents were

asked what they thought was the most important characteristic of sustainable food the most popular answer in most EU countries was that it should be 'nutritious and healthy'. However, in Ireland, the Netherlands and Denmark, the most frequent response was that 'low environmental and climate impact' was the most essential characteristic. In Ireland this was followed by the need for it to be 'nutritious and healthy' and 'respect for workers' rights, health and safety and fair play'.

An Update on the High-Output Grass-Based Spring Milk Production System at UCD Lyons Farm



UCD Lyons Farm

An update on the High-Output Grass-Based Spring Milk Production System

Online Webinar
Time: 10am-12pm
Date: January 14th 2021

Register at: www.bit.ly/UCDSystemsHerd

UCD School of Agriculture and Food science and the UCD School of Veterinary Medicine are pleased to invite you to a webinar where the dairy team would be delighted to share with you and the wider dairy industry an update on the performance of the Research Herd.

When: 14 January 2021 at 10am

Location: Zoom

Register here:

<http://www.bit.ly/UCDSystemsHerd>

GMP+ Feed Certification Scheme 2020

GMP+ wish to inform you that they will publish the renewed scheme between 1 March and 15 March 2021. Once they publish the scheme, a 6-month preparation period will start. This will allow everyone to assess the documents. A 3-year transition period will follow and gives all companies time to change from the current scheme to the new scheme. This short video is worth watching to see how the changes to the scheme have evolved <https://youtu.be/OgaJRSeloMc>

GMP+ Protocol Monitoring Aflatoxin B1

As a result of the evaluation of the available analysis results of Aflatoxin B1 in maize, GMP+ International together with other accepted scheme holders, has adjusted the risk profile for Aflatoxin B1. Changed Risk Profiles - Ukraine - reduced from medium to low. This means that maize originating from Ukraine may be analysed less frequently. This new risk profile took effect 18 December 2020.

UFAS Guidance - Sampling and Testing document

AIC has announced that an updated edition of the UFAS Guidance - Sampling and Testing document has been published. Amongst the changes made are updated cross references to requirements in the UFAS Standard, and revised example analysis tables in the Appendices.

The other key addition to the guidance is a new section on contractual testing, with particular reference to the requirements for sampling and testing within the terms of the AIC No.1 and No.2 Grain Contracts. The guidance can be downloaded from the AIC website [here](#).

Technical News

Medicated Feed Update

On 18 December the Veterinary Medicines section of DAFM advised homemixer medicated feed licence holders about the changes to manufacture, placing on the market and use of medicated feed (EU 2019/4) which come into effect across Europe in January 2022. They are as follows

1. Standards to ensure that medicines are mixed evenly throughout the feed will be established.
2. Maximum levels of acceptable cross contamination which will have to be adhered to will be set.
3. It is required for a vet to perform a clinical examination/submit clinical samples to a lab for diagnosis of the disease present in order to write a prescription for medicated feed.
4. Prescription Changes
 - o A prescription for antimicrobials must be filled within 5 days of being written.
 - o A prescription for any non-antimicrobial medicine must be filled within 3 weeks of being written.
 - o The length of treatment if not specified shall be for max of 1 month or 2 weeks for antibiotics.
 - o Each prescription shall only be used for treatment of animals on one occasion.
 - o Prescriptions can be filled anywhere in the EU.
 - o Animals must be specifically identified on the prescription.
5. Animals can no longer be treated with antibiotics in feed as a preventive measure, except in exceptional circumstances.
6. Animals can only be treated with feed medicated with antibiotics as "in-contacts" following diagnosis of bacterial disease in the group by a vet when the risk of spread of an infection is high and the consequences of the infection are likely to be severe.
7. DAFM is required to have information on the usage of antimicrobial medicines. The Pig AMU database was launched in November 2019 and all commercial pig herds have already been asked to input their antimicrobial usage data on a quarterly basis.
8. If you become aware of any suspect/adverse event as a result of the use of medicated feed you must report it to DAFM and the Health Product Regulatory Authority (HPRA).
9. A safe system to collect and discard unused medicated feed will be established.

To view the full document, see [link](#)

Antimicrobial Resistance

The European Commission has published its 5th progress report on the implementation of the European One Health Action Plan against Antimicrobial Resistance (AMR), which was adopted in June 2017. The key objectives of this plan are built on three main pillars: making the EU a best practice region; boosting research, development and innovation as well as shaping the global agenda. Addressing AMR through a One Health approach is also a priority for this Commission, as flagged in Commissioner Kyriakides' Mission letter in November 2019.

The progress report shows that a number of AMR initiatives have been continued or put in place in recent months. For example, the Commission has adopted in the EU Farm to Fork Strategy a target aiming to reduce by 50% the overall EU sales of antimicrobials for farmed animals and in aquaculture by 2030. This objective will be supported by the implementation of the recent Regulations on Veterinary Medicinal Products and on Medicated Feed for which implemented and delegated acts are currently being drafted. The next progress report is planned to be published in mid-2021. For the full report click [here](#)



Feeding the Food Chain

Wishing you and yours a
safe and happy Christmas
and a prosperous New Year

Thank you for your support
throughout the year

From Deirdre, Maeve & Cornelia

