

# FEED ISSUES

## IGFA MONTHLY NEWSLETTER

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## General News

### Brexit – Imports

DAFM hosted a workshop on Importing Animal Feed on 19 February. The event was in response to calls from IGFA for more information specifically for the feed industry and was an opportunity to get answers to the many detailed questions that members have as a result of Brexit changes. 344 participants attended the workshop – a clear indication of how necessary it was.

The presentation videos are available to download here

Paul Vickers - [How to import animal feed from outside the EU in post Brexit era](#) | Eva Gethings - [Watch this short six minute video on how to import medicated feed from UK after Brexit](#) | Justin Byrne - [How to import animal by-products \(ABPs\) from outside the EU since Brexit](#) | Ruth Sanders - [Six-minute explainer on the official veterinary controls needed for import of animal feed](#) | John Higgins - [How to import products of animal origin, including hay and straw – after Brexit](#) | Ray Ryan - [Rules of Origin explainer from Revenue](#)

We have also posted PDF's of the presentations and answers to the questions submitted on <https://www.igfa.ie/Brexit.html>.

### Brexit – Exports

The UK Government will phase in their new border controls for UK imports in three stages up until 1 July 2021. DAFM have commissioned a short survey of Irish Feed Businesses to examine their export activities with GB. This information will be used to help them with any certification issues that may arise from 1st April 2021. **DAFM asked us to make you aware of the survey which is available [here](#)** for completion and return to [feedexports@agriculture.gov.ie](mailto:feedexports@agriculture.gov.ie)

DAFM have also agreed to hold an exports webinar for feed. We will advise you of the details as soon as they are available.

## Feed & Food Statistics



FEFAC, The European Feed Manufacturers' Federation published a new statistical yearbook which contains data on feed (compound feed production, feed materials consumption, turnover, number of plants etc) and food (meat production, consumption, etc.) for the calendar year 2019.

The yearbook provides an overview on the European feed sector's economic development and the factors that influenced the data trends in 2019. It is available [here](#).

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## WHAT'S ON

March	<a href="#">Teagasc Events</a>
Mar 02	IGFA Feed Committee meeting
Mar 03	EU Animal Nutrition committee meeting
Mar 09	Compound Feed production committee
Mar 15	Bord Bia Meeting
Mar 17	Environmental Footprint Webinar
Mar 29	INAP Committee meeting

## USEFUL LINKS

HSE Covid 19	CDC Covid19
Crop Forecast	Irish Fbo's
Protein Balance	<a href="#">Fbo Forms</a>
Oeju	Daflm Brexit
Fsai Amr	Daflm Amr
<a href="#">Compound feed Labelling Code</a>	
<a href="#">Daflm Trader Notices</a>	<a href="#">SCoPAFF</a>
WASDE	<a href="#">NDCC</a>

## RASFF Feb 2021

Total Food & Feed	323
Food	294
Food Contact Materials	11
Total Feed	18
Feed Materials	10
Feed Premixtures	0
Feed Additives	0
Compound Feed	2
Nuts, products and seeds	0
Pet food	6

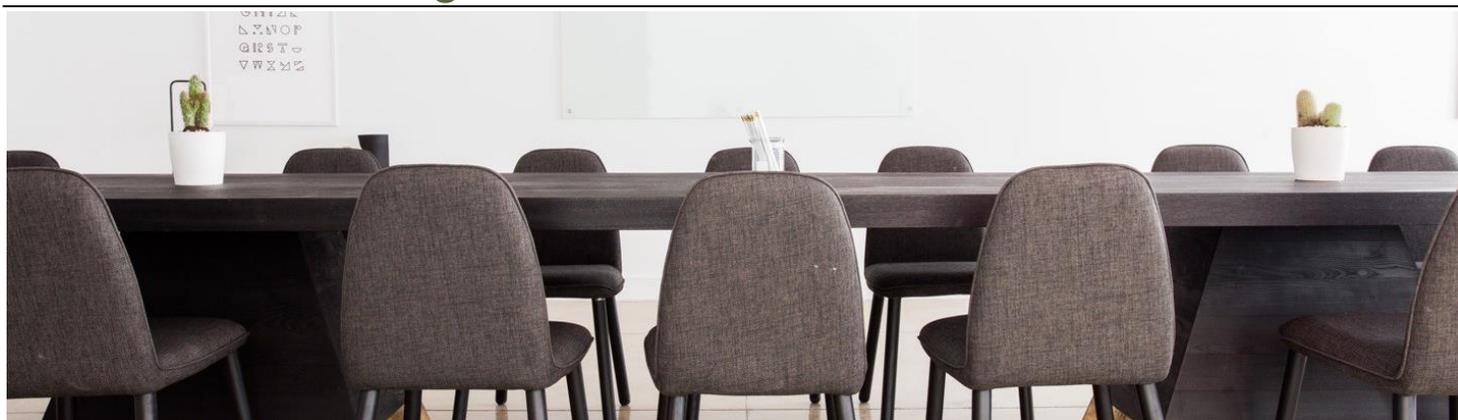
## EU Price Dashboard

This [price dashboard](#) provides a monthly summary of price data for the most representative agricultural inputs, agricultural products and consumer food prices, at EU and world level. Although not all the products are comparable at both EU and world level, this document is intended to give an indication on the most recent price developments.

## Trader notice

Feed Business Operators (FBO's) are notified of relevant changes in legislation and of policy issues by way of Trader Notices issued by DAFM. The first trader notice of 2021 was issued on 12 February reminding FBO's of their responsibilities (see [link](#)). FBO'S were reminded that if they consider or have reason to believe that a feed does not satisfy feed safety requirements, they should notify DAFM at [FFGPDfeedinspectors@agriculture.gov.ie](mailto:FFGPDfeedinspectors@agriculture.gov.ie). The trader notice also advertises one of the online training courses delivered by IGFA in partnership with Macra Agricultural Skillnet.

## IGFA Online Training Courses



IGFA, in partnership with Macra Agricultural Skillnet, have three courses available

No	Course name	Details
1	Feed Regulations & HACCP for Animal Feed Manufacturing	<a href="#">Module 1</a> : History of Animal Feed Regulation <a href="#">Module 2</a> : HACCP Principles <a href="#">Module 3</a> : Prerequisites <a href="#">Module 4</a> : HACCP Application
2	Feed Safety Management System for Retailers and Wholesalers of Animal Feed	<a href="#">Module 1</a> : History of Animal Feed Regulation <a href="#">Module 2</a> : HACCP Application
3	Feed labelling and Feed Claims	<a href="#">Module 1</a> : Feed Formulations The basics <a href="#">Module 2</a> : Feed Labelling Regulation <a href="#">Module 3</a> : Building the Label <a href="#">Module 4</a> : Feed Claims

If you want further details on any of these courses please contact [cornelia.oconnell@eorna.ie](mailto:cornelia.oconnell@eorna.ie)

## FEFAC new Soy Sourcing Guidelines 2021

At the start of February FEFAC released their new [Soy Sourcing Guidelines 2021](#), updating the 2015 original version. The aim of the guidelines is to provide a credible, verifiable source of information on available market options for sourcing responsibly produced soy. The guidelines are not a standard in themselves but provide an independent benchmark whereby soy standards and programmes can be assessed against criteria on issues such as responsible working conditions, environmental responsibility and good agricultural practices. 19 responsible programmes successfully passed the benchmarking exercise against the Soy Sourcing Guidelines 2015 but the 2021 version has been updated with a range of new and essential criteria. Initial results of the benchmarking against these new guidelines will be available from May 2021.

A new innovative feature of the 2021 guidelines is the possibility for responsible soy schemes to voluntarily benchmark themselves against a new desired criterion on their capacity to deliver 'conversion-free soy'. The aim is to provide verifiable assurances that the soy cultivation did not drive conversion of natural eco-systems. The schemes that deliver this 'conversion-free soy' will be displayed on the FEFAC webpage so that all the details are transparent. FEFAC held a public webinar on 3 February to present the new guidelines and it can be reviewed [here](#). A two page [factsheet](#) is also available.

## Green Feed Labelling

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One of the key elements of the Farm to Fork strategy is the promotion of more sustainable food systems. This is highly dependant on the consumer's ability to make an informed choice. In its Farm to Fork strategy, the EU Commission announced its intention to examine ways to harmonise voluntary green claims and to create a sustainable labelling framework. A legislative proposal is expected in 2024. In the mean time, as part of the circular economy action plan, the EU Commission proposes that companies substantiate their environmental claims using Product and Organisation Environmental Footprint methods. It is important to note that currently environmental claims fall under the scope of claims as defined and ruled by article 13 of Regulation (EU) 767/2009.

FEFAC (European feed manufacturers) have invested in the development of a PEFCR (product environmental footprint category rules) methodology covering feed production and developed a database (GFLI) with a view to enabling feed manufacturers to communicate on the environmental performance of the production of their feed and ensure a level playing field for such communication. FEFAC are running an event on 17 March that aims to give some practical information and advice on product environmental footprinting. Although environmental footprinting could be an innovative way of showing the sustainability of feed products, the tools available are complicated and often difficult to translate into practice. The webinar will help participants 'understand how direct value can be efficiently realized for everyday feed formulation'. Obviously, March 17 is a bank holiday in Ireland but the event will be recorded and can be viewed later.

If you are interested in more details on this webinar please contact [maeve.whyte@eorna.ie](mailto:maeve.whyte@eorna.ie)

## Algae use in Feed

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Algae represent a largely untapped resource in Europe. They can be used to produce food, feed, pharmaceuticals, bioplastics, fertilisers and biofuels. The potential of algae is recognized in EU initiatives such as Farm to Fork and the new circular economy action plan.



The European Commission is now preparing a comprehensive cross-sectoral EU algae initiative. The aim of the initiative is to increase the sustainable production, consumption and use of algae and algae-based products. Because of their small carbon and environmental footprint, raising the profile of algae could help achieve EU environmental objectives. Among some of the potential outcomes, two are meant to stimulate the use of algae products as feed: the identification of the regulatory obstacles and a binding target for substitution of fish meal & fish oil by algae products. Several consultation stages are foreseen in Spring 2021.



EFSA [commented](#) emphasising the lack of knowledge on the feed safety risk of algae products. They highlighted an ongoing study aimed at investigating "the wide range of contaminants and pathogens potentially associated with seaweed" and a planned project to "identify food and feed safety vulnerabilities in such circular economy practices and technologies" including technologies for seaweed production. IGFA will keep you posted on this topic over the coming months.

# Technical News

## Review and Revision of The Renewable Energy Directive II

On 17 September 2020 the European Commission presented a 2030 Climate Target Plan to cut GHG emissions by at least 55% by 2030, compared to 1990 levels. The aim is to become the first climate-neutral continent by 2050. As part of this the European Commission is continuing to assess how EU renewable energy (Directive 2018/2001/EU) rules can contribute to higher EU climate ambitions.

The FEFAC response to the above acknowledges the strategic importance of an EU energy policy promoting renewable energy sources for the EU but said that the upcoming review and possible revision of the Directive should focus on sectors such as transport, heating and cooling in industry and buildings. It highlights that the 7% of food and feed crops contributing to renewable energy production, is a good compromise and balances respective sector responsibilities and competition between the food and energy sector usage. FEFAC also recommended that the Commission include a facility that would allow to remove feedstocks set out in parts A and B of Annex IX in case of inconsistent evaluation (e.g. molasses inclusion in Annex IX in 2017). Otherwise, the EU risk jeopardizing the functioning of the Single Market and the resilience and sustainability of the EU food & feed sector.

It should be constantly highlighted that The EU compound feed industry uses approximately 20 mt. of co-products from the EU food industry, converting human inedible materials into valuable, high nutritional value products for animal feeding purposes. This reuse of co-products: • reduces GHG emissions from feed production • contributes to the circular economy • increases the EU's self-sufficiency in feed protein production • reduces nutrient leakage by increasing nutrient efficiency • prevents food losses • contributes to food security and increased resilience of the EU feed and food chain.

## Legal Standards for Mycotoxins in Feed

Mycotoxin guidance levels were introduced in 2006 to reflect the fact that, in absence or low transfer of most mycotoxins (except aflatoxin) into products of animal origin, human health **was not at risk**. See [link](#) to current guidance levels.



The European Commission officially launched a consultation on a draft proposal for a revision of the legal standards for mycotoxins in feed. As anticipated and communicated last year, the most critical elements for the feed industry are a reduction of the regulatory levels for DON in pig feed and the extension of the legal framework to T2/HT2. Also critical is the proposed shift from guidance values to maximum limits for these mycotoxins in compound feed, while maintaining the concept of guidance values for feed materials and complementary feed. However, on the latter issue, SCoPAFF seems open to discussion with stakeholders. This proposal concerns all mycotoxins except aflatoxin.

The principle underlying the draft proposal is that it's necessary to secure animal health and animal welfare by setting strict maximum limits instead of guidance values regarding the number of mycotoxins in the complete diet. It would remain then up to manufacturers of complete feed (industry or home mixers) to secure, via formulation, compliance of complete feed with these limits. No such maximum limits would be required for feed materials and complementary feed, thus avoiding wastage of resources. However, for complementary feed, there still could be an investigation performed in case it might contain mycotoxins at levels exceeding the maximum limit for complete feed.

FEFAC will develop its position based on the views of its committees. The consensus to date is that switching from guidance values to maximum limits for compound feed only will put the feed industry in a position of weakness in relation to suppliers. This could lead the feed industry to require contractual guarantees with a margin of security at a cost for the livestock sector. There is also the possibility that most contaminated consignments will be directed to on-farm manufacturers with hardly any controls, thereby increasing potential

health and welfare risk for animals fed with on-farm produced feed. This would be a particular concern for pigs and with the reduction of the maximum limit from 0.9 to 0.7 ppm for DON, FEAC experts are concerned that this could be extremely challenging for that sector. This view was supported by **an Irish representative at the last FEAC meeting who highlighted that a change from the current 0.9 ppm guidance to 0.7 ppm maximum level for DON in pig feed would make it extremely difficult for countries like Ireland, with wet maritime climates, to use our own cereals in difficult harvest years.**

## **GMO - Novel Genomic Techniques (NGTs)**

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Members will remember that in November 2019 the Commission was requested to prepare, by 30 April 2021, "a study in light of the Court of Justice's judgment in Case C-528/16 regarding the status of novel genomic techniques under Union law". The study is expected before the Farm Council meeting on 26 – 27 April 2021. Even if the study upholds a positive view in favour of NGTs, the Commission will take follow-up action such as re-opening/updating GM legislation only if there is strong support from the Parliament and Council. IGFA will follow the release of this report in April closely.

Meanwhile the French Minister for Agriculture, Julien Denormandie, has recently said that France opposes an EU court decision to put NGTs under strict GMO regulations, as those techniques are different to genetically modified organisms. There is significant NGO pressure to put the court's decision into action but the French ministry is working on a report that draws on the detailed opinion from the Commission and 5 member states to show the difficulty of implementing the decision. It seems that the idea of the ministry is to delay final decisions as much as possible, at least until the publication of the commission's study (above) on NGTs when the issue could be addressed via a revision of EU law on gene editing/targeted mutagenesis.

Following the release of a study by a group of scientists stating they had developed a method to identify gene edited oilseed rape varieties, the European Network of GMO Laboratories (ENGL) released its evaluation of the method. It says that the new method put forward by the scientists cannot differentiate between genetically modified SU oilseed rape and other variants (that occur from a natural mutation). It adds that the method is not fit for regulatory compliance.

Not to be deterred, VLOG (Association for Food without Genetic Engineering, Germany), sent a letter to the Commission opposing/challenging the ENGL evaluation. The Commission said "In view of the findings of the EURL/ENGL, the Commission and all Member States concluded that the Member States that would like to use this detection method should be aware of its limitations, notably that the method does not distinguish regulated products from non-regulated ones, and complement it with appropriate official control measures." It is unclear what other methods could be used as an official control.

## **Enogen (3272)**

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Enogen maize was launched in the US market in 2011. It was destined for the ethanol industry as an alpha-amylase enhanced variety. The bio-ethanol production process requires the addition of a microbially-produced thermostable amylase enzyme to convert starch into sugars prior to fermentation. When 3272 maize is used, instead of adding the microbial amylase enzyme, 3272 grain is simply blended with other maize grain to a final concentration up to approximately 15%.

Studies assessed by EFSA indicate that the alpha-amylase activity in the DDGs from conventional ethanol production was three times higher when compared to the activity from DDGS produced from 3272 maize. Enogen maize grain is in fact now sought after by cattle fattening lots in the US due to improved animal performance. It has received both food and feed approval in most countries and regions.

EFSA has delivered a Scientific Opinion concluding only on the safety of the DDGS, stating that this is the main product that might enter the EU market. On the other Feed and Food products EFSA remains inconclusive while requesting further data. It should be noted that Syngenta only submitted data for DDGS. Based on this EFSA opinion, DG SANTE, as risk manager, considers that it would be only possible to achieve an approval for DDGs. The EFSA opinion is inconclusive on food use due to possible allergenicity characteristics.

# Pesticide Approval Authorisation and MRLs post Brexit

From 1 January 2021, an independent (from the EU) pesticides regulatory regime is in operation in Great Britain (England, Scotland and Wales). The Health and Safety Executive (HSE) remains the national regulator for the whole of the UK, on behalf of the UK government. In order to prevent loss of products from the market all existing (EU) active substance approvals, PPP authorisations and MRLs will continue to be valid in Great Britain.



Existing authorisations will remain valid until their current expiry date. Active substance approvals due to expire before December 2023 have been extended for 3 years to allow time to plan and implement the GB review programme. The application of the Northern Ireland Protocol means that European Plant Protection Product (PPP) regulations continue to apply in Northern Ireland. Full details are on the [HSE website](#).

New decisions however, taken under the EU regime will not apply in Great Britain. This includes active substance and maximum residue level (MRL) decisions and any new EU PPP legislation. MRLs in Great Britain and the EU will therefore start to diverge over time. Businesses producing food/feed for export should consider the MRL requirements in each target market. The GB register of MRLs is available [here](#).

Mutual recognition allows a good that meets relevant regulatory requirements relating to sale in the part of the UK it is produced in, or imported into, to be sold in any other part of the UK. This applies to rules on pesticide maximum residue levels (MRLs) and means treated produce from Northern Ireland produced in compliance with EU pesticide MRLs, can be placed on the market in Great Britain. This applies even if EU and GB pesticide MRLs diverge and the EU MRL is higher than the GB MRL, as long as it is a qualifying Northern Ireland good.

On 6 January 2021 the EU amended MRLs for 9 active substances (myclobutanil, napropamide, sinterfen, chromafenozide, fluometuron, pencycuron, sedaxane, tau-fluvalinate and triazoxide on certain products). As a result, the GB and EU / NI MRLs for these active substances on some products have now diverged. Further MRL amendments are expected to take place throughout 2021. **IGFA has held an initial meeting with AIC to discuss the situation and plans to raise the issue with GAFTA and FEAC. It is hoped the HSE will agree to develop an easy to use database that will allow the trade to do quick comparisons on MRLs by commodity.**

## Deltamethrin

Deltamethrin is one of the few pesticides left in some parts of the world for use in grain stores. The active ingredient is coming into question based on its risk to the aquatic environment. The dossier has been submitted by Bayer and they expect a decision in the second quarter of 2022 with an implementation date of 2025. It is possible for the company to apply for an import tolerance to deal with residues in imported products.

## Glyphosate

It is expected that the decision to be taken by the SCoPAff to reduce the MRL on soybeans to 5 ppm may be delayed beyond June 2021. This would leave time for EFSA to conclude its review of the import tolerance dossier. The import tolerance dossiers request that the MRL for glyphosate on soybean is left at 20 ppm.

## Processing Factors and MRLs

The European Commission announced its intention to provide a guidance to Member States in 2021 on how processing factors could be taken into account for enforcement decisions. The aim of the document will not be to establish harmonised processing factors or to work towards specific MRLs for all processed products, but to give some guidance to Member States on how to apply processing factors using the best information available.