

FEED ISSUES

IGFA MONTHLY NEWSLETTER

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General News

New FEFAC Soy Sourcing Guidelines 2021



FEFAC, the European Compound Feed Manufacturers' Federation, published a new, updated version of the [Soy Sourcing Guidelines](#) on 3 February. The Guidelines have been updated from the 2015 version and include a range of additional essential and new desired criteria to help enable continuous improvement on responsible soy sourcing within the EU feed sector. Although not designed as a standard or a professional soy sourcing recommendation in themselves, the guidelines provide an independent benchmark for interested responsible soy schemes and programmes. They also provide credible, verifiable information to those in the soy value

chain on the market solutions available to access responsibly produced soy for the European feed market.

Another new element included in the guidelines is the ability for responsible soy schemes to voluntarily benchmark themselves on their capacity to deliver 'conversion-free soy' and provide credible assurances that the soy cultivated under their schemes did not drive conversion of natural ecosystems. A new transparency tool for conversion-free soy will become available and the schemes that deliver this will be displayed on the FEFAC webpage.

IGFA highlights market challenges to Minister McConalogue



The Portuguese agriculture minister is chairing the Agriculture Council meetings for the first half of this year and FEFAC wrote to the minister before the Agriculture Council in January asking them to discuss and take action on some urgent animal feed issues.

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WHATS ON

Feb	Teagasc Events
Mar 02	IGFA Feed Committee meeting
Mar 03	EU Animal Nutrition committee meeting
Mar 09	Compound Feed production committee

USEFUL LINKS

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 Jan 2021

Total Food & Feed	320
Food	294
Food Contact Materials	6
Total Feed	20
Feed Materials	15
Feed Premixtures	0
Feed Additives	1
Compound Feed	0
Nuts, products and seeds	0
Pet food	4

IGFA supported this move with a letter to Minister McConalogue highlighting the sharp price squeeze on farmers at the moment. This is as a result of a lack of adequate market outlets for their produce due to the closure of the hospitality and catering sectors, increased demand from China as they recover from Covid19 for large amounts of soybean and corn on global markets, strike action in Argentina delaying deliveries of cargos of soybeans and soyhulls and supply issues since November in the US and projected from South America. IGFA emphasised that 'We are now moving from a period of bumper crops and high stocks to a situation of lower stocks and potentially reduced crops for 2021'. IGFA requested that EU Agriculture ministers act to remove EU retaliatory import duties on US feed grains and to recognise the inability of the sector to withstand these pressures.

Commodity Dash Board

This price dashboard from the European Commission provides a monthly summary of commodity 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 of the most recent price developments. The latest version is available [here](#)

Irish Feed Statistics

For the latest Irish feed stats summarised by IGFA see the IGFA webpage' [IGFA webpage](#)

UCD Lyons Systems Herd

UCD held an information webinar on January 14 2021 on the Development of a High-Output Grass-Based Spring Milk Production System.

The herd focuses on maximising milk solids production per cow and per hectare from moderate use of purchased feed. The breeding strategy on the farm is for a high EBI Holstein Friesian with optimised production and fertility traits. The production system is focused on maximising grass production and utilisation. With growing environmental concerns due to increasing cow numbers in relation to emissions and water quality, the future derogation from

the Nitrates Directive may come under pressure. The objective of the study is to evaluate the profitability of milk production utilising a stocking rate of 3.4LU/ha on the milking platform and 2.4LU/ha on the whole farm. Milk yield target is 7,500-8,000kg/cow or 625kg Milk Solids per cow. The diet consists of 1.5t of concentrates per cow with 51% of the diet as grazed grass / 75% of the diet as grazed grass/grass silage.

The annual feed budget contains 93-94% grazed grass/grass silage on an as fed basis. The herd was compared against a very efficient low concentrate system of milk production that incorporates a stocking rate of 2.75LU/ha, 5,550kg milk yield, 450kg milk solids with 350kg DM concentrates per cow per year. Financial performance was compared across the two systems. Farm profitability including land, labour and interest was €48 per cow and €59/ha greater for the high output system of milk production. When considering potential future stocking rate limitations, the profitability of both production systems will come under significant pressure. When analysing performance where stocking rates became limited to 2cows/ha under a no derogation system, the reduction in profitability was more significant for the low cost system compared to the high output system. If you missed the webinar you can view it [here](#)

Importing or Exporting Animal Feed

Animal feed Import notification form

The image shows two versions of the 'ANIMAL FEED IMPORTATION FORM'. The left version is the main form for importers, containing fields for importer name, contact person, contact number, commodity category (with a list of 14 categories), date of arrival, method of importation, ship name, and premises. The right version is a 'COMMODITY DETAILS' form, which includes instructions for product naming, a table for recording discharge points (First and Second), and sections for organic status and OMO identification.

It was brought to our attention that there were some anomalies with the format of the Animal Feed Import notification form. For example, some commodity descriptions were not in line with the product definitions in feed labelling and marketing regulation (EC) No 767/2009.

IGFA therefore made a submission to DAFM with suggested changes and they have subsequently revised and amended the form. The DAFM website has not yet been updated but we were advised that it will be uploaded shortly. We also requested it is uploaded in MSWord version to assist those wanting to complete it electronically. DAFM are planning to email the revised form directly to those companies that frequently

use it so that they can use it immediately.

Brexit – Import controls

IGFA held a meeting with DAFM feedingstuff division on 20 January 2021 to discuss the challenges members are experiencing in relation to import notification of standard feed and feed containing Products of Animal Origin (POAO). These issues have also been highlighted at Commission level. They include

- [Regulation 2019/2007](#) establishes that all preparations of a kind used in animal feeding classified under Cn codes 2309, when containing “products of animal origin”, shall be subject to controls at border control posts (BCP’s), except subheadings 2309 90 20 and 2309 90 91. However, feed materials derived from animals do not meet the definition of “products of animal origin” which is reserved for products destined for human consumption. This creates confusion on the market as to which type of compound feed/premixture containing animal by products is subject to import via BCPs and which are not.
- Certain national authorities do not authorize the import in the EU of products of animal origin and feed containing them in absence of a specific model of health certificate contained in Annex XV of Regulation (EC) No 142/2011 (example of glucosamine and chondroitin sulphate, both listed in the EU Catalogue of feed materials).
- A health certificate is required for each ingredient of animal origin incorporated in a compound feed. This creates disproportionate bureaucracy.

We have made available on <https://www.igfa.ie/Brexit.html> a summary of the import process to the best of our current knowledge.

DAFM has agreed to hold a Brexit work shop on feed specific issues and as soon as a date is agreed we will let members know.

Third Country Representative (provided by DAFM 21.01.2020)

The primary role of a Third Country Representative is to ensure that establishments located in Third Countries meet, at least, feed production conditions equivalent to those laid down for establishments located in Member States. This equivalency is to ensure that the products from such Third Country feed business operators do not pose risks for human or animal health or the environment.

In this regard, a Third Country Representative will be required to maintain adequate records that demonstrate that feed being produced and imported from the company they represent, meets all EU feed legislation and in particular the feed hygiene requirements set out in Annex I of Regulation 1831 of 2005 and the labelling requirements under Regulation 767 of 2009. This will include maintaining details of products being imported, their production, ingredient lists, traceability etc. All labels will only use the official language of the Member State where the product is being placed on the market.

In addition, the Third Country Representative is required to keep a register of products that the establishments which they represent have put into circulation within the Community.

The Department requires that an application for Third Country Representative status is made on the prescribed form. The proposed Third Country Representative entity must be a registered feed business operator based in Ireland. Further information on this process is available [here](#).

Feed Safety Course for Retailers and Wholesalers of Animal Feed

A new online training course in Feed Safety For Retailers And Wholesalers Of Animal Feed (HACCP), is available for booking by all feed business operators. For more details on the course please contact cornelia.oconnell@eorna.ie



Feed Safety Management System for Retailers and Wholesalers of Animal Feedingstuffs

Course Curriculum

[Start next lecture >](#) Module 1: History of Animal Feed Regulation

This online course is divided into 2 modules. Select complete and continue at the top of the screen to move between modules.

<input checked="" type="radio"/>	Module 1: History of Animal Feed Regulation	Start
<input type="radio"/>	Module 2: HACCP Application	Start
<input type="radio"/>	Multiple choice test	Start
<input type="radio"/>	Please complete 'Participants profile form'	Start

Authorised Economic Operator (AEO) Programme launched

The Chartered Institute of Logistics & Transport Ireland (CILT) have launched a new Authorised Economic Operator (AEO) Application and Authorisation programme. Authorised Economic Operator (AEO) status can bring important benefits for businesses. Significantly fewer customs formalities and reduced customs clearance costs could make a real and positive difference for many businesses, particularly those suffering negative Brexit impacts.

A course is available that will focus on the application process for AEO and the stages involved in granting the authorisation. It will cover all aspects of the different types of AEO and the benefits of these in the international supply chain; understanding the new EU Traders Portal for e-AEO applications; and how to liaise with the relevant customs authorities throughout the application and authorisation process. The course will involve an in-depth examination of the AEO Self-Assessment Questionnaire (SAQ), common mistakes made in the application process, and the maintenance of your AEO, once granted.

This is a blended course delivered online through eLEARN, CILT Skillnet's e-learning platform. The course centres around a one-day live training session via Zoom, with one unit of short pre-recorded lessons to be completed, prior to the live class-day. The cost of this programme has been significantly subsidised with grant-funding with and costs €190 per place. Click [here](#) to book a course starting 15 February 2021 and [here](#) for a course starting 24 February 2021.

Technical News

Antimicrobial resistance (AMR) - Colistin statement

Antimicrobial resistance is a 'One Health' challenge for human health, animal health and our shared environment. Colistin is an antimicrobial that is used in both human and veterinary medicine. Colistin is very important for human health where it is used for serious life-threatening bacterial infections causing significant mortality and morbidity. Due to the spread of highly resistant bacteria, colistin has been increasingly used as a drug of last resort in human medicine.

There is evidence of emergence of resistance to colistin worldwide due to its increased use to treat multidrug resistant infections in the human population. This emergence of resistance increases the public health burden of antimicrobial resistance. The World Health Organisation (WHO) has included colistin in a list of Highest Priority Critically Important Antimicrobials.

There are alternatives for use in veterinary medicine to treat bacterial disease, and any cessation in use would not result in a major impact on animal health and welfare. For this reason, the members of the Animal Health Implementation Committee, which includes IGFA, with responsibility for delivery of the actions contained within Ireland's national action plan to address antimicrobial resistance support the voluntary cessation of use of colistin to treat disease in the animal health sector.

Nitrate Regulation - New Measures effective from 01/01/2021

[SI 605 of 2017](#) (as amended) effective from the 1st of January 2018 gives legal effect to Ireland's 4th Nitrates Action Programme (NAP)

A maximum crude protein content of 15% is permissible in concentrate feedstuff fed to grazing livestock on the holding between 1 April and 15 September 2021 (Article 15.6). Records of crude protein content of concentrate feedstuff shall be kept in accordance with Article 23(1) (i)

Q. Is this requirement only for dairy cows on the holding?

A. No, this measure is focussed on dairy cows and cattle over two years and does not apply to livestock under two years.

Q. What will be the level of Crude Protein (CP) allowed in concentrate feeds for grazing livestock at grass?

A: Bovine livestock greater than two years old, including dairy cows, fed on a 100% grass forage diet during the main grazing season will be required to comply with a maximum of 15% CP (on a fresh weight basis) between 1st April and 15th September in 2021. Note: If higher levels of crude protein are required, this needs to be justified and certified by the appropriate advisor.

Q. Who qualifies as an appropriate advisor for the purpose of this certification?

A. An appropriate advisor is the compounder, supplier of feed, nutritionist or agricultural advisor.

DAFM has updated its Frequently Asked Questions (FAQ) document available at the following [link](#)

DEFRA announce Consultation on Gene Editing

Plans to consult on gene editing were announced in January by the Department of Environment, Food and Rural Affairs (DEFRA) in the UK. Gene editing is different to genetic modification where DNA from one species is introduced to a different one. Gene edited organisms do not contain DNA from different species, and instead only produce changes that could be made slowly using traditional breeding methods. Those advocating the technique say it could deliver benefits for the environment, help farmers with crop resistance to pests, disease or extreme weather and help with the production of healthier, more nutritious food.

At the moment, due to a legal ruling from the European Court of Justice in 2018 gene editing is regulated in the EU in the same way as genetic modification. The DEFRA [consultation](#) will focus on stopping certain gene

editing organisms from being regulated in the same way as genetic modification, as long as they could have been produced naturally or through traditional breeding. This approach has already been adopted by a number of countries across the world including Japan, Australia and Argentina.

Feed Additives: New Guidance for Renewal of Authorisation



Feed additives are authorised for 10 years. Subsequently, applicants must submit a new request showing that the additive remains safe for target species, consumers, users and the environment under the conditions of the authorisation.

Assessment of renewal applications are simpler as they focus solely on the safety of the product, unless the applicant proposes changes to the additive (e.g. its manufacturing process, or composition) or the conditions of the authorisation (e.g. different target species, conditions of use).

EFSA have now published new guidance [here](#) on the information applicants need to include in their dossiers for the renewal of the authorisation of feed additives.

[Edition 02/2021](#) European Union Register of Feed Additives was published on 21 Jan 2021

Animal Health

Avian Influenza

Avian influenza (also called 'bird flu') is a viral disease that primarily affects poultry and wild fowl.

- Highly Pathogenic Avian Influenza (HPAI): spreads rapidly causing serious disease with high mortality (up to 100% within 48 hours)
- Low Pathogenic Avian Influenza (LPAI): causing generally a mild disease, may easily go undetected

On 21 December 2020, new regulations were introduced which require biosecurity measures to be taken regarding the confinement of poultry and captive birds to help mitigate the risk of avian influenza. DAFM published FAQ's for poultry owners relating to the Avian Influenza (Precautionary Confinement of Birds) Regulations 2020 (SI No.663 of 2020)

Additional biosecurity regulations were also introduced in December to help protect poultry and captive birds from avian influenza. (SI No.566 of 2020) and a guidance document is available to view [here](#). A ban on bird gatherings, marts and assemblies for the purposes of show or sale is also currently in place (SI No.567 of 2020). The highest levels of biosecurity are imperative during this high risk period for Avian influenza in all flocks irrespective of size

Current Situation in Ireland

- The restriction zones which were introduced within a 10 km radius of the confirmed avian influenza outbreak in a turkey flock in Wicklow were lifted on 14 January 2021.
- There have been no further outbreaks of avian influenza H5N8 confirmed in poultry or captive birds in the Republic of Ireland since that single outbreak which occurred on 10 December 2020.
- However, there have been further cases of avian influenza H5N8 confirmed in wild birds nationally and wild birds continue to pose a significant risk for the spread of the disease to poultry and captive birds.

For more information see Republic of Ireland [link](#) and NI [link](#)