

FEED ISSUES

IGFA MONTHLY NEWSLETTER

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General News

Brexit – New Timetable for Exports to GB

The UK Government made a statement on 11 March regarding the phased introduction of controls on imports from the EU into Great Britain. It has now decided to revise its June 2020 timetable for these new measures saying that 'the disruption caused by COVID has lasted longer and has been deeper than we anticipated' and 'we have listened to businesses who have made a strong case that they need more time to prepare'. Specifically they have outlined the below

- Pre-notification requirements for Products of Animal Origin (POAO), certain animal by-products (ABP), and High Risk Food Not Of Animal Origin (HRFNAO) will not be required until **1 October 2021**. Export Health Certificate requirements for POAO and certain ABP will come into force on the same date.
- Customs import declarations will still be required, but the option to use the deferred declaration scheme, including submitting supplementary declarations up to six months after the goods have been imported, has been extended to **1 January 2022**.
- Safety and Security Declarations for imports will not be required until **1 January 2022**.
- Physical SPS checks for POAO, certain ABP, and HRFNAO will not be required until **1 January 2022**. At that point they will take place at Border Control Posts.
- Physical SPS checks on high risk plants will take place at Border Control Posts, rather than at the place of destination as now, from **1 January 2022**.
- Pre-notification requirements and documentary checks, including phytosanitary certificates will be required for low risk plants and plant products, and will be introduced from **1 January 2022**.
- From **March 2022**, checks at Border Control Posts will take place on live animals and low risk plants and plant products.

Brexit - UK Guidance on Exporting to UK

Given the revised timetable for the introduction of UK import control processes, the UK Department for environment, food and rural affairs (Defra) has made the following guidance available online.

[Guidance](#) - EU business: exporting to the UK - Updated the 'Exporting animals and animal products' section to clarify that import controls for EU countries will be introduced in stages during 2021 and early 2022:

[Guidance](#) - Importing or moving live animals, animal products and high-risk food and feed not of animal origin, including imports from an EU country on 3 phases

[Guidance](#) Import plants and plant products from the EU to Great Britain and Northern Ireland, including imports from an EU country on 3 phases

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WHATS ON

April	Teagasc Events
April 12	Webinar - Managing methane emissions in livestock farming
May 19	Webinar - Animal Health and Welfare: What role for animal nutrition
Jun14	Fefac Animal nutrition
Jun 18	Premix & Mineral Feed

USEFUL LINKS

HSE Covid 19	CDC Covid19
Crop Forecast	Irish Fbo's
Protein Balance	Fbo Forms
Oeju	Dafm Brexit
Fsai Amr	Dafm Amr
Dafm Trader Notices	SCoPAFF
WASDE	NDCC
iNAP	Labelling code

RASFF March 2021

Total Food & Feed	398
Food	362
Food Contact Materials	18
Total Feed	18
Feed Materials	10
Feed Premixtures	0
Feed Additives	3
Compound Feed	2
Pet food	3

Trade Tariffs Suspended

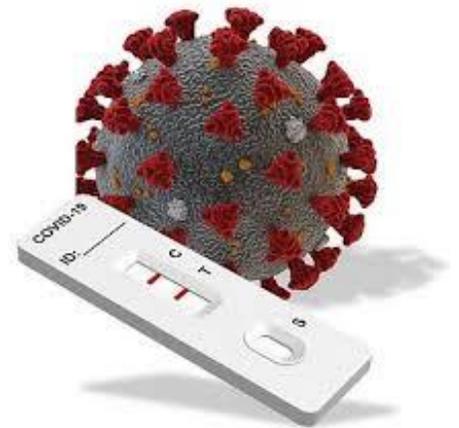
EU tariffs on US molasses and sugar beet pulp were suspended at midnight on 10 March for a 4 month period. Introduced last November, the tariffs were the result on the long standing Airbus/Boeing dispute which had knock on impacts on agri food products and trade. IGFA has been calling for months for these tariffs to be lifted, highlighting the financial impact of the measures on suppliers and the potential negative impact on farmers. We also raised concerns with government and ministers about the communication of this issue to industry and the complete lack of real consultation.

The expectation is that the EU and US will try to resolve the issues over the coming months and find a more durable, negotiated solution to the dispute. With the new US administration settling into office there is optimism in the EU that the trade relationship will be more positive in future and that positive developments might be possible on bilateral issues and multilateral ones within the World Trade Organisation (WTO).

COVID-19 - Rapid Testing for Food and Feed Businesses

At the March IGFA feed committee meeting, Donal Sammin (DAFM State laboratories) presented an update on the Rapid Antigen Testing Detection Tests (RADT). These tests may be used by FBOs to further enhance risk mitigation for COVID-19 in the workplace. The RADT test has the potential to identify persons who are likely to be infectious.

The Test: RADT, which is a lateral flow test, has a lower sensitivity than RT-PCR for detecting COVID-19 cases. However, RADT can rapidly detect potentially infectious individuals and offers FBOs greater flexibility in managing the risk to their workers and their businesses. It is a non-invasive, self-sampling test and can therefore be used for more frequent mass screening of the workforce than would be possible using RT-PCR testing. FBOs can also use the test to check contract staff who may enter the business for a short period. The test takes 15 minutes to complete.



Availability: Over the past few months, DAFM, the HSE and the meat industry have validated the RADT kit provided by Abbott Panbio. These kits are being made available free of charge to meat plants. Businesses will be asked to abide by the guidelines, report results and sign a disclaimer. IGFA understands that the kits cost approximately €5 (depending on the volume purchased) and must be used under the 'supervision' of a suitably qualified medical person. Currently the HSE will only provide these kits to plants involved in follow up PCR testing within their specific project with meat plants.

Training: Webinars, guidelines and a helpline are available through DAFM/UCD. These resources are applicable to the Abbot kits but may serve as useful guides if you have sourced other kits. Alongside the Abbot system, IGFA understands that kits from Lumira, Siemens and Roche are being successfully used in food businesses. These kits are lateral flow systems and use nasal swabs as samples.

Information for Management <https://youtu.be/Y4XGLC2K1iQ>
A Practical guide to test rollout - Part 1 <https://youtu.be/TEQ2WD5gwtM> -
A practical guide - Part 2 <https://youtu.be/yIzmXbLDnIM> -
DAFM will also provide assistance on rapidtest@agriculture.gov.ie.

Finally, investigators from the Science Foundation Ireland funded Rapid-Response project UPCOM (Understanding and Preventing Risks of COVID-19 Transmission in Meat Processing Plants), with DAFM colleagues, are supporting further training and information for food business operators wishing to roll out rapid testing.

They are developing a specific UPCOM website but in the meantime, you may be able to contact the lead researchers [here](#)

Sustainability News

Nitrates Derogation

IGFA contacted Teagasc Dairy Specialists to highlight concerns about the impending derogation deadline of 1st April coinciding with changeable weather and variable grass growth rates/grazing conditions. As a summary members are reminded of the following key points

1. This new guideline only applies to farmer in the derogation, the large majority of dairy farms in Ireland are not farming under the terms of the derogation.
2. The reduction in Crude Protein to 15% only applies if 100% of the forage is coming from grass, therefore if silage remains in the diet there is an allowance for this and it can be signed off at the end of the year.
3. Animals under 2 years of age are exempt from the reduction in Crude Protein.
4. Best practice recommendation is that complementary feed should be formulated with lower protein to complement high protein grass in the main grazing season.

Webinar on Environmental Foot Printing for Feed

Discussions continue within EU feed companies about environmental footprinting and how it might work for animal feed products. It is a complicated, technical process and as yet it is unclear how we can apply at farm level to add value to our customers. Sometimes it is difficult to see how it can be applied in the real world. On 17 March, FEFAC hosted a webinar aimed at clarifying how the Product Environmental Footprint Category Rules (PEFCR) and Global Feed Life Cycle Analysis Institute (GFLI) datasets can be put into practice. A recording of the event can be found [here](#) and the presentations are available below.

Delanie Kellon:	How to Use the GFLI Database for Environmental Impact Assessments of Feed
Hans Blonk:	Making a Feed PEF study in practice
Tom Battagliese:	Integrating life cycle analytics into feed formulation for a more sustainable value chain
Dr. L von Fricken:	Applied climate protection – Improving the ecological footprint of compound feed

Livestock and the environment

European Livestock Voice, a group made up of EU farming and livestock stakeholders, tackled key Farm to Fork paradoxes in its webinar held on 25 March and presented them in this interesting short [video](#)

Dates for your diary

FEFAC are running webinars on priority issues for the feed industry over the coming months.

1. 12 April 2021 Managing methane emissions in livestock farming
2. 19 May 2021 Animal Health and Welfare: What role for animal nutrition

Further details can be found [here](#).

Technical News

Commission Consultation on Processed Animal Protein (PAP)

After years of discussion and as a result of further research conducted on this topic, the European Commission launched a [consultation](#) on 9 March 2021 looking for views on the 'Authorisation to feed non-ruminants with ruminant collagen / gelatine and with proteins from insects, pigs and poultry'. In short, the draft regulation allows the use of insect protein and non-ruminant protein in poultry and pig feed.

The commission explained that 'since the enforcement of a total feed ban, in 2001, the epidemiological situation regarding BSE has considerably improved in the EU with no classical BSE case since 2016 and 24 Member States having a negligible BSE-risk status'. It also highlighted sustainability issues and the goal to make better use of the protein and other feed material produced in Europe. The consultation is open until 6 April

2021 and an 'indicative' vote amongst member state representative signalled that there is huge support for the proposal.

IGFA has fed views into FEFAC and the FEFAC board has approved a response to the consultation highlighting that the move offered opportunities in terms of the circular economy but underlining that safety is a requisite. It stresses the importance of acceptance by other partners in the chain from livestock farmers to consumers and that the decision to use PAPs must be taken by individual operators, preferably with the support of its partners in the chain. It also emphasises the economic concerns associated with the move in relation to issues such as the need for specialisation of production lines, monitoring and testing.

A final vote will be taken on the proposal in April or May after which time the European Parliament will have a 3 month scrutiny period. Initial discussions in the Parliament indicate that the MEPs are likely to be divided on the proposal with some welcoming its contribution to a circular economy and others convinced that it presents too many risks for the food chain.

Outcome of the SCoPAFF meeting of 9-10 February 2021

The Animal Nutrition (AN) Section of the Standing Committee on Plants, Animals, Food and Feed (SCoPAFF) held their first meeting of 2021 on 9-10 February. Keeping informed of the outcomes of these meetings will help you keep abreast with regulatory changes as they happen, thereby making the reading of the regulations easier down the line.

Revision of Regulation (EU) No 68/2013, the catalogue of feed materials

The Committee discussed a new version of the draft to revise the catalogue of feed materials, in particular the hemp entries and algae meal. Progress was made on how to prohibit the placing on the market of non-eligible hemp-derived products and the iodine content in algae meal. Discussions were launched to integrate provisions from the Animal By Products (ABP) and TSE Regulations into specific entries in the feed catalogue under sections 8. Milk products and products derived thereof, 9. Land animal products and products derived thereof and 10. Fish, other aquatic animals and products derived thereof. Work on the draft will continue at the next Committee meeting.

Medicated Feed Regulation (EU) 2019/4

Member states were reminded about the application date of the new medicated feed Regulation in less than a year and highlighted in particular the provisions about penalties as referred to in Article 22 thereof. The scientific risk assessment concerning maximum levels of cross-contamination carried out by EFSA, as referred to in Article 7(3) of the Regulation, is scheduled for September 2021.

RASFF

The Commission's representative informed the Committee on the RASFF notifications related to undesirable substances in animal feed, issued since the meeting of the Committee in December 2020. The notifications related to a too high level/content of: - aflatoxins in pet food products from US; - aflatoxin B1 (220 µg/kg) in groundnuts for birds from Argentina; - mercury (2.9 mg/kg) in yeast from Brazil; - ragweed seeds (329 mg)/kg in buckwheat from Poland; - ergot sclerotia (4948 and 1069 mg/kg) in rye from Germany; - matrine (0.13 mg/kg) in organic feed for dairy cattle from the Netherlands.

Tolerances of feed additives in premixtures

Due to the current absence of EU rules allowing such technical tolerances for additives in premixtures, it is up to the competent authority of the Member State, where the premixture is placed on the market, what tolerance it applies, insofar the general rules laid down in EU legislation, both concerning safety and labelling, are complied with. Thus, the national authorities would not be obliged to accept technical tolerances established by the national rules of another member States.

It should be mentioned that the Commission does not have an overview of the tolerances applied by the different Member States. Considering that the setting of tolerances is also being considered in the context of the preparation of future EU legislation on feed additives/premixtures, the following pragmatic approach could be followed pending the finalisation of the revision of the feed additives Regulation: the technical

tolerances already established for feed materials and compound feed in Part B of Annex IV of Regulation (EC) No 767/2009 could be taken as reference values.

Maximum Permitted Levels of Trace Elements in Animal Feed

Only feed additives that have been through an authorisation procedure may be placed on the market and used. Authorisations are granted for use in feed intended for specific animal species or categories, and for specific conditions of use.

One of the specific conditions of use of trace elements is that there is maximum permitted level in the complete feed. For example conditions of use of trace element copper is maximum permitted level of 30 mg/kg of complete feed for other bovines see [link](#).

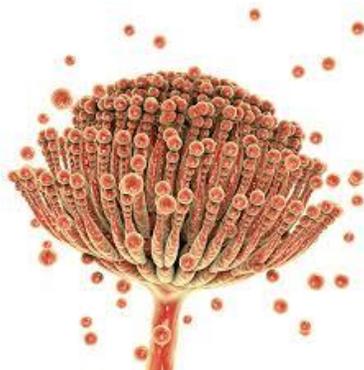
Identification number of the additive	Name of the holder of authorisation	Additive	Composition, chemical formula, description, analytical method	Species or category of animal	Maximum age	Minimum content	Maximum content	Other provisions	End of period of authorisation
						Content of element (Cu) in mg/kg of complete feed with a moisture content of 12 %			

Category of nutritional additives. Functional group: compounds of trace elements

3b405	—	Copper(II) sulphate pentahydrate	<p><i>Additive composition</i></p> <p>Copper(II) sulphate pentahydrate as a powder with a minimum content of 24 % copper</p> <p><i>Characterisation of the active substance</i></p> <p>Chemical formula: $\text{CuSO}_4 \cdot 5\text{H}_2\text{O}$ CAS Number: 7758-99-8</p> <p><i>Analytical methods (1)</i></p> <p>For the identification of Copper(II) sulphate pentahydrate in the feed additive:</p> <p>— European Pharmacopoeia Monographs 0894 and 20301</p> <p>For the crystallographic characterisation of the feed additive:</p> <p>— X-Ray diffraction</p>	All animal species	—	—	<p>Bovines:</p> <p>— Bovines before the start of rumination: 15 (total);</p> <p>— Other bovines: 30 (total).</p> <p>Ovines: 15 (total).</p> <p>Caprines: 35 (total)</p> <p>Piglets:</p> <p>— suckling and weaned up to 4 weeks after weaning: 150 (total).</p> <p>— from 5-th week after weaning up to 8 weeks after weaning: 100 (total).</p> <p>Crustaceans: 50 (total).</p> <p>Other animals: 25 (total).</p>	<p>1. Copper(II) sulphate pentahydrate may be placed on the market and used as an additive consisting of a preparation.</p> <p>2. The additive shall be incorporated into feed in the form of a premixture.</p>	13 August 2028
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Mycotoxins

A stakeholder workshop was held with the commission on 9 March and the industry positions submitted on the proposed changes to mycotoxin regulations.



Concerning the concept of maximum limits, FEAC argued that there was no real justification to switch from the system of guidance values that has worked well, to a more constraining system that would limit considerably the range of risk management tools at the feed mill, forcing operators to be more selective as to the contamination load of the feed materials they buy, in particular co-products. Maximum limits may also affect home mixers even more seriously when bound to use their harvest. These arguments were echoed by many stakeholder organisations. The Commission stressed that the market itself, via quality schemes like GMP+ International, set rejection limits for compound feed and feed materials. FEAC experts underlined that such rejection limits do not

operate the same way as maximum limits and did not lead automatically to the withdrawal of the products. IGFA has been in contact with DAFM regularly on the issue.

It has been indicated so far that most member states are supportive of these changes. The legislative timetable is still unclear and the Commission has agreed to provide better information/support on test methods and rapid testing validation. It is difficult to see the member states stepping away from maximum levels for complete feed and complementary feed. Members are reminded to update their understanding of

their legal obligations under 2002/32 when supplying feed materials direct to farmers. If you wish to comment on this issue please contact IGFA.

The highlights of the proposed changes are

DON

- Lowering of guidance levels for feed materials and a new level for sugar beet
- Lowering of the levels in pig feed to 0.7 ppm (mg/kg) and change from recommended levels to maximum

Zearalenone

- Lowering of guidance levels for feed materials and introduction of new levels for beet products and oil seed products
- Beet possibly to be moved to the maize levels
- Setting of maximum levels in feed and introducing new species

T2 H2

- Maximum levels set to be set for feed

Fumonisin B1 & B2

- Lowering the guidance in feed materials to 30 mg/kg
- Lowering the levels for ruminant, calf, horse and some extra species.

Ochratoxin

Overall unchanged apart from setting maximum levels in feed and introducing levels for cats and dogs.

Early Warning-Aflatoxin B1

Possible contamination with Aflatoxin B1 observed in maize gluten feed from France. Concentrations of up to 0.0186 mg/kg found. Supplied to France, the Netherlands, Belgium and Germany (ref. GMP+ EWS). Feed safety limit is 0.02 mg/kg in feed materials (ref. Directive 2002/32/EC on undesirable substances in animal feed).

Pesticides



DAFM is now using the pesticide risk assessment tool developed by the Belgian authorities for feed. Feed materials in breach of the Food MRL for the original products will be risk assessed using the tool. The pesticide section are accepting the feed stuffs risk assessment and support the use of the tool.

It is not possible(at the moment) to use the calculator for whole grains. The pesticide risk assessment calculator can be found at the second last link [here](#)

Animal Health

Antimicrobial Resistance (AMR)

Antimicrobial resistance (AMR) is now recognised as a major threat to human and animal health. The 12th INAP Animal Health Implementation [Committee](#) of whom IGFA are stakeholders, meeting was held remotely on 4 December 2020. The 10th ESVAC report on antimicrobial sales in 31 countries in 2018 was discussed at this meeting. The report outlined a 34% reduction in antimicrobial sales across the EU since 2011, with Irish sales still above 2011 levels, however demonstrating a slight decrease and continuous downward trend from 2016-2018. Shortcomings of analysing sales data were discussed. Ireland was ranked 12th highest out of 31 countries for antimicrobial sales in 2018. The 2019 HPRA Sales Report showed a noticeable reduction of 11% in overall tonnage of antimicrobials sold in 2019 of 88.8T, compared with 99.4T sold in 2018. It is evident that the setting

of targets within the various sectors for reducing usage has been seen as an effective strategy in the UK to reduce sales of AMs by 45% since 2015.

With regard to the [AMU Pig database](#), 131 of the current 364 pig herds of interest have now input data to the AMU pig Database. This only represents 44.51% coverage of the pig population based on 2019 slaughter figures. The current AMU (antimicrobial use) figure for 2020 of 127.8 mg/kg is subject to change as more data is input to the AMU database. Input of AMU data to DAFM is currently voluntary. The Bord Bia QA Standard is being amended to make it a requirement for pig producers to input AMU data – this will greatly assist our overall understanding. **In anticipation of this change, IGFA members are requested to encourage more pig farmers to supply data to the database.** For more information see [link](#).

Avian Influenza

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

Current Situation in Ireland

- There have been no further outbreaks of avian influenza H5N8 confirmed in poultry or captive birds in the Republic of Ireland since a single outbreak which occurred on 10 December 2020. The restriction zones put in place following that outbreak were lifted on 14 January 2021.
- 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.



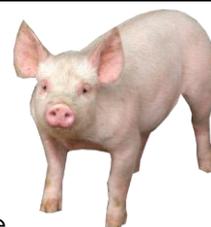
Current Situation in Northern Ireland

- No further outbreaks of avian influenza H5N8 have been confirmed in poultry or captive birds in Northern Ireland since the two separate cases confirmed on 7 January and 11 January.
- Since our previous update, the restriction zones put in place following those two separate confirmed outbreaks of avian influenza HPAI H5N8 in poultry flocks in Co. Antrim, have now been lifted.
- Restriction zones surrounding the Clough outbreak were lifted on 10 February 2021, with those surrounding the Lisburn outbreak lifted on 11 February 2021.

For more information click [here](#)

African Swine Fever (ASF)

African swine fever (ASF) is a viral disease of pigs and wild boar that is usually fatal. The disease can result in devastating losses for pig farmers and the pig industry in affected countries. There is no cure or vaccine available for ASF and the disease is spreading across the world. Ireland is free of ASF and it is in all of our interests to keep it that way as an outbreak of the disease would have a huge impact on our pig industry.



ASF however continues to spread to new countries and territories. Pig owners in Ireland are advised to remain vigilant and to implement biosecurity measures to mitigate the risk of an outbreak of the disease. Such measures include never allowing pigs to have access to food waste and implementing a pig free period of 72 hours for anyone coming from an ASF affected region. For more information click [here](#)