

# FEED ISSUES

## IGFA MONTHLY NEWSLETTER



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### GENERAL NEWS

#### Igfa Lobbying

The legislation on Lobbying is designed to provide information to the public about **who is lobbying whom about what**. Members are reminded that under the legislation, if you are lobbying then you must register on the [website](#) and make a return every four months. It is the responsibility of the person doing the lobbying not the designated public official. The January-April 2020 returns are now due. In this period IGFA submitted letters to Minister Ross, Harris , Humphreys, Creed , The Taoiseach's office , TD Carty , Howlin , Mc Conalogue , in order to have feed specifically designated as an essential service under the Covid 19 programme. The request was accepted.

#### USSEC Global Conference

U.S. Soybean Export Council Global conference and situation report was run on line on April 14<sup>th</sup> and 15<sup>th</sup>. It was remotely attended by IGFA members . For anyone who missed the conference and is interested in it please click on the links below to view.

To view day one (click [here](#)) and input [cornelia.oconnell@eorna.ie](mailto:cornelia.oconnell@eorna.ie) and ENTER. Thomas Mielke, Editor and CEO of Oil World giving reflections of Global S&D in light of COVID-19 Pandemic and [Emily French](#), Managing Director at ConsiliAgra shares the implications of Black Swan Events on the Global Soy Market Place. To view day two (click [here](#)) and input [cornelia.oconnell@eorna.ie](mailto:cornelia.oconnell@eorna.ie) and ENTER. You will hear directly from their producers from all around the U.S.A on their Spring Planting Outlook and exporters from AGP, Bunge, Cargill and Clarkson Grain on the U.S. Soy's Ability to Meet Export Demand. This content will be available for 90 days.

#### EU Support Measures To The Agricultural Sector

On 22<sup>nd</sup> April the EU Commission has adopted exceptional market management measures supporting among others the dairy and certain meat sectors. The package includes:

Private storage aid (PSA) – to support dairy (€30 million to skimmed milk powder, butter and cheese;) and meat (€26 million to beef; €20 million to sheep and goat meat) products;

Flexibility in the market support programmes for wine, fruits, vegetables, olive oil, apiculture;

Flexibility in in the EU's school programs for milk, fruits, vegetables.

Exceptional derogation from EU competition rules: milk, flowers and potatoes sectors will be allowed to adopt self-organisation market measures, including private storage.

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### WHATS ON

May	Teagasc events
May 14 <sup>th</sup>	UFAS Working group
May 19 <sup>th</sup>	Fefac Industrial compound feed meeting
May 27 <sup>th</sup>	Schothorst Swine Seminar
June 3 <sup>rd</sup>	Fefac General Assembly meeting

### 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
Dafm Trader Notices	Pig Innovation

### RASFF APRIL 2020

Total Food & Feed	166
Food	155
Food Contact Materials	7
Total Feed	4
Feed Materials	2
Feed Premixtures	0
Feed Additives	1
Compound Feed	0
Nuts, nut products and seeds	0
Pet Food	1

## EU Agricultural Markets in 2020



The outbreak of the coronavirus brings about unprecedented challenges for the EU agri-food sector. The sector has responded and adapted to the new circumstances, including logistical disruptions and rapidly evolving demand, with efficiency, supported by measures taken by the European Commission.

The European Commission has released its short-term outlook for EU Agricultural Markets in 2020 in which they tried to analyse the impact of the COVID-19 outbreak. According to the EC, the agricultural sector has suffered relatively less damage compared to other sectors of economy mainly affected by lockdown measures (hotels, restaurants, recreation). A major disruption in supply chain has been avoided thanks to the fast establishment of the EU guidelines for border management measures, including **green lines**. Due to shifts in food chain and closure of Hotels, Restaurants, catering, the most affected agricultural sectors are beef, goat and lamb meat, dairy (esp. cheese) but also flowers and the wine sector. Overall, DGAGRI expects that the COVID-19 outbreak and its challenges (increased cost of transport and logistics) might impact food prices in the future.

On the cereal side, the EU wheat is becoming more competitive as the exports should reach 31.8 million ton for MY 2019/2020. On the oilseed side, the rapeseed production for MY 2019/2020 is expected to be only 14, 9 mil ton which is 17 % less than 5 years average. This, however, should be compensated by still high import of soya beans (14,2 mil. ton) and rapeseed (6 mil ton). According to the report the decrease in Distillers Dried Grains availability could boost use of other domestic HiPro protein meals for feed in MY 2019/2020. Driven by meal use, the production of soybean and sunflower should increase in MY 2019/2020. The production of protein crops (field peas, lentils, chickpeas) is expected to increase to 4.5 million ton in MY 2020/2021 driven both by food and feed use. In regards to the compound feed industry, report says that, due to the good pig and poultry market, the demand for compound feed is still increasing. However, the new grazing season might reduce the compound feed demand for the ruminant sector. The Industrial Compound Feed Committee will discuss the most recent market developments at the meeting on 19th May, taking into account also this report and its COVID-19 outbreak impact assessment, including forecast of compound feed production 2020 for the major species, for more information see [link](#)

## Import Duty On Maize, Sorghum And Rye



The EU Commission published [27/04/2020](#) the new import duty on maize, sorghum and rye. The Commission justified the measures as follows: **"In light of an ample supply and low prices for maize worldwide, the automatic mechanism calculating import duties was triggered, setting as of today import duty on maize, sorghum and rye at € 5.27 per tonne. This will ensure that European producers are not put at a disadvantage in the current market conditions"** For more information click [here](#).

IGFA supported a letter last week to the Commission, highlighting concerns that the calculation of the new import duty for maize did not take into account an additional 25% import duty on US maize imported into the EU adopted on 20 June 2018 (Regulation 2018/886).

## Brexit



The 2<sup>nd</sup> round of negotiations on the future relationship between the EU and UK took place last week and Michel Barnier, the EU's lead negotiator, spoke to the press on 24 April. He lamented the fact that more progress had not been made, adding that "the UK refused to engage seriously on a number of fundamental issues". He noted specifically that progress was disappointing in discussions on the 'level playing field'. On this, he said that the UK negotiators repeated that they are "negotiating as sovereign equals", meaning each side must be able to decide on conditions of access to their respective markets. However, Barnier believes "the reality of this negotiation is to find the best possible relationship between a market of **66 million consumers** on one side of the Channel and a market of **450 million consumers** on the other".

Barnier said that the UK government had made clear that it would refuse any extension of the transition period beyond 31 December 2020 but reminded the press that there are only two rounds of negotiations left; in the weeks of 11 May and 1 June. It was previously agreed between the two sides that they would take stock of progress in the negotiations at a high-level event at the end of June and Barnier warned that real progress is needed before then. He said that the UK "cannot refuse to extend the transition and, at the same time, slow down discussions on important areas".

## Ufas News

**Remote Auditing:** In conjunction with AIC, Lloyds Register have developed a protocol for delivering audits remotely throughout this restriction period (ref, AIC briefing F20-018, 20<sup>th</sup> April 2020). As outlined in the AIC briefing the remote audit will consist of three elements:

1. Pre-submission of a list of documents via the secure LR UFAS portal - Participants who do not yet have a login, should contact the LR team at [ufas-ca@lr.org](mailto:ufas-ca@lr.org)
2. A "systems audit" - This will involve the auditor reviewing the documents submitted against the requirements of the relevant clauses of the UFAS standard, and arranging a time for a call (or ideally a video conference) to discuss the documents and clarify any queries arising
3. Live-stream audit of site - This will use a secure App that can be downloaded onto a smart phone and allow the auditor to capture images using the camera, and hold a conversation with the participant

No auditor should be putting pressure on any business to breach the COVID 19 public health guidance. Members in doubt should check with Lloyds Register (or KIWA) and ensure you are provided with an auditor capable of completing a remote audit.

Members are reminded to check with suppliers / contractors as to what measures they have taken in order to maintain feed safety during this period. Participants with any queries or concerns should contact the Lloyds Register team at [ufas-ca@lr.org](mailto:ufas-ca@lr.org) or Simon Williams [simon.williams@agindustries.org.uk](mailto:simon.williams@agindustries.org.uk).

**Feedback** on the suitability of these remote audits from igfa members is welcomed over this period.

We have received feedback from a food company that had a BRC audit. *It was primarily focused on COVID 19 controls within the business and **upkeep of the quality management system during the pandemic**. The auditor took into consideration the history of the site and reviewed NCs raised in previous years. The auditor reviewed certifications held, internal audits, and customer complaints. Using share point we could easily guide the auditor through these. There was no live streaming of the facility included in the audit. Unless the auditor is very familiar with a site.*

**Reformulations and Labelling:** Further to requests from AIC, the UK Food Standards Agency provided the following legal clarifications on reformulation and animal feed production establishments which was issued to all UFAS participants on 16<sup>th</sup> April (ref, AIC briefing F20-017). The details were as follows  
Where a business has to change their standard feed formulations alternatives may be used under the following criteria:

- The substituted ingredients are permitted for use in the UK and EU.
- The substituted ingredients are used in accordance with any legislative criteria e.g. target species, maximum permitted limits, etc.

- Any reformulation must ensure the feed is safe for the intended species or category of animal.
- Accurate information for reformulated feeds to reflect the actual composition of the product, must be provided for the individual product unit(s), to correct existing information by the use of over-stickers with the additional option to signpost to an appropriate point of information (e.g. website).
- Where the reformulation invalidates any claims, the on-pack label must be amended, so as not to mislead the customer. Other advertising materials must also be amended accordingly.

In addition, prior to production and where appropriate the business may wish to notify the customer directly of any deviation from contracted standard formulations e.g. bulk deliveries to farm.

## Official Controls



The department of agriculture and the marine (DAFM) has informed IGFA based on their risk assessment, desktop checks will be performed on feed mills in the short-term. controls will be maintained in ports and full follow up will take place in the event of an incident or a report of a feed safety issue in an FeBO.

## Training

**MAgrSc Agricultural Extension and Innovation:** Macra Agricultural Skillnet in partnership with UCD are offering a two year part time Masters programme. aimed at agricultural professionals who are working in the industry and who want to undertake a postgraduate programme while continuing to work. See link for more information. The closing date for application is 18<sup>th</sup> May 2020. For more information contact [skillnet@macra.ie](mailto:skillnet@macra.ie) / 01 4268900 or Dr Thomas Russell school of agriculture and food science UCD [tomas.russell@ucd.ie](mailto:tomas.russell@ucd.ie) / 01 7167702

**IGFA Feed Legislation & HACCP for Feed Manufacturing:** Congratulations to all those who have completed the course and passed the assessment. For anyone interested in taking the course see <https://www.macra.ie/macra-skillnet>. Details of Feed Legislation advanced course to follow in next months feed issues.



## TECHNICAL NEWS

### Sustainability

**DAFM Protein Surveys:** On behalf of the feed committee we would like to thank all members who completed the protein survey. There has been a very good response from industry. We will present the finding at the next Feed committee meeting in June. The minutes from the DAFM climate change meeting have been delayed. Of critical importance to the IGFA members is that the record of the meetings accurately reflect the following : Discussions on the impact of diets on the environment should include total diet. Research scope should be widened to allow a review of stocking rates and sustainability. Recognition of additives under the climate action plan must be predictive, transparent and should be undertaken by a body with expertise in this area.

**Eu Sustainable Food Strategy Delayed Due To Covid19:** Publication of the EU's **Farm to Fork** strategy will be delayed until May 20<sup>th</sup>. The strategy is part of the **EU Green Deal** – the overarching plan to make the EU's economy more sustainable and to deal with the climate change challenge. Originally due in March and then at the end of April, the Farm to Fork strategy will focus on the EU food system and will specifically look to 'reduce significantly the use and risk of chemical pesticides, as well as the use of fertilisers and antibiotics'. It will also address ways to strengthen efforts within the food chain to tackle climate change, reduce food waste and measures to achieve a circular economy and sustainable food consumption. The EU commission has

stated that the delay in publication until May 20<sup>th</sup> allows them to take Covid19 lessons learned on food security into account in the upcoming proposals. A new EU Biodiversity Strategy is likely to be published at the same time.

## Antimicrobial Resistance (AMR)

Antimicrobial resistance (AMR) is now recognised as a major threat to human and animal health.

**INAP Animal Health Implementation Committee:** The 9<sup>th</sup> meeting was held remotely on 22<sup>nd</sup> april 2020. Deirdre Webb and Cornelia o'Connell were in attendance. Caroline Garvan, DAFM updated attendees on inap animal health implementation plan and presented EU a summary report on AMR from zoonotic and indicator bacteria in humans, animals and food.



Julie Bolton, updated us on the **Pig AMU database**. This is a national antimicrobial usage database for pigs which was introduced on the 1<sup>st</sup> November 2019. As a first step, DAFM requires all pig herd owners who send more than **200 pigs** a year to slaughter to register with the online services through [www.agfood.ie](http://www.agfood.ie), in order to facilitate the submission of antibiotic usage returns for their pig herd. It will be a requirement under Bord Bia's new QAS for Pigs that all commercial pig herds submit AMU data to DAFM. **It is unclear how the data will be verified or how errors in the data will be assessed for the moment.**

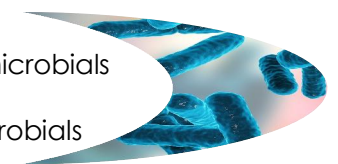
Zara Conlon, DAFM followed with a presentation on DAFM Policy on Highest Priority Critically Important Antimicrobials – draft version and AMR and Behavioural Science was presented by Áine Regan, Teagasc. Reducing antimicrobial usage in agriculture requires behaviour change. We have seen huge changes in behaviours during this Covid 19 crisis, one would wonder if this will have a positive impact in the long term on farmer and consumers response to AMR concerns. Rob Doyle, DAFM closed the session with Joint Report on One Health Country Visit to Discuss Antimicrobial Resistance Policies.

Earlier in the week IGFA had been in contact with DAFM requesting that when the new legislation is drafted the Irish S.I should reflect the EU legislation correctly i.e the legal burden is on the veterinarian to script VMD correctly. IGFA lobbied with FEFAC, to ensure the liability for accuracy of these scripts be placed on veterinarian who are professionally trained in this field. Igfa wishes to be consulted at the earliest possible stage when the new legislation is being drafted. Members are currently reviewing scripts and any non-conformances noted are being raised with vets. Igfa Members are encouraged by DAFM to advise them of these non compliances.

**Alternatives To Antimicrobials In The EU:** The committee for medicinal products for veterinary use (CVMP) has adopted a draft reflection paper on 'promoting the authorisation of alternatives to antimicrobials in the eu'. this draft reflection paper has been developed to identify additional measures that could be implemented to promote the authorisation of alternatives to antimicrobials in the eu. it was available for public consultation until 30<sup>th</sup> april 2020.

The draft [CVMP reflection paper](#) lists a number of proposals, ranging from

- clarification of Veterinary Medicinal Product (VMP) status of alternatives to antimicrobials
- lighter evaluation procedure for phytogenics (as VMPs)
- criteria for the evaluation of claims related to the reduction of the use of antimicrobials



As part of the consultation process Fefac Animal Nutrition Committee, submitted comments in particular pointing to:

- Our appreciation of such an initiative and our call for a similar exercise to be performed on feed additives
- Our support to a light procedure for the assessment of phytogenic substances
- A call to open the EU rules for dietetic feed to allow for claims related to the contribution of animal nutrition solutions, including feed additives, to the reduction of the need for antibiotics

A copy of these comments was forwarded to Marta Ponghellini, Deputy Head of Unit Animal Nutrition, Veterinary medicines.

## Regulatory Updates

**Mycotoxins – Amendments To Guidance Levels:** Currently in animal feed regulation (undesirable substances in animal feed) [Directive 2002/32/ec](#) maximum permitted levels are set for aflatoxin b1 and rye ergot (claviceps purpurea). Guidance levels have been agreed for other mycotoxins.

Some member states have been leading the discussion on how best to balance the revised levels for mycotoxins in feed as proposed by EFSA, with the need to better protect animal health and welfare under EU law. Members are reminded that under [2017/625](#) (officials controls) there is an increased emphasis on animal health and welfare alongside feed safety. The Commission proposal involves a reduction in guidance limits for Don, T2 H2, Fumonosins and Zearalenone.

**A proposal from some members states is to set maximum levels in feed but not in feed materials.** The EU feed industry has rejected this proposal. A full consultation with industry will take place later in the summer. The commission is of the view that there is no evidence that guidance levels have not worked so far and wish to retain this flexibility. Some countries have objected to the lowering of Don levels in pig feed as they consider they will not be able to meet the lower requirements of 0.5 mg/kg. The Commission has requested evidence from feed manufactures of the number of breaches of recommended levels (of Don) they have found in feed or feed materials over the past few years.

**Members willing to share data please contact igfa.** This issue will be on the agenda for the June feed committee meeting.

**Feed Additives:** There has been three editions of the feed additive register published in 2020. The most recent being Edition 3/2020 (281): published on 28 April 2020 see [link](#)



Within each there are feed additive additions (reauthorisations), notifications of applications under article 14 and deletions.

In [latest edition](#) they were 5 additions

- ✓ 2; a; Colourants. 2a160b; Norbixin (annatto F) [Dogs; Cats (EU) 2020/376
- ✓ 2; b; Flavouring compounds; 2b233; Hop extract (strobiles) rich in beta acids; (EU) 2019/111
- ✓ 3; b; Compounds of trace elements; 3b803; Sodium selenate [Ruminants]; (EU) 2020/377
- ✓ 3; c; Amino acids, their salts and analogues; 3c382; L-leucine; (EU) No 2020/378
- ✓ 3; c; Amino acids, their salts and analogues; 3c410; L-threonine; (EU) 2020/238