

# FEED ISSUES

## IGFA MONTHLY NEWSLETTER

ISSUE NO 10 | October | 2020

## General News

### Preparing for Brexit – Third Country Reps

From January 2021, the import of all feed (feed materials, compound feed, feed additives, premixtures, medicated feed & former foodstuffs) directly from GB (i.e. England, Wales or Scotland) will require **third country representation**. The third country representative can be based either in the Republic of Ireland or in any other EU Member State.

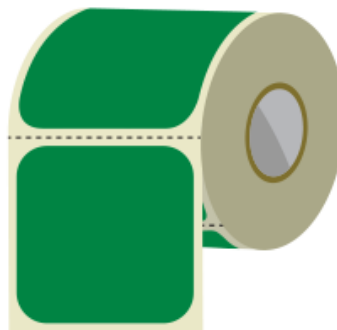
The primary role of a third country representative is to ensure that establishments located in third countries meet at least equivalent conditions to those laid down for the establishments located in the Member States, in order to ensure that the products deriving from them do not pose risks for human or animal health or the environment. They are also required to keep a register of products that the establishments which they represent have put into circulation within the EU community.

Businesses can apply to become third country representatives by filling out the “third country representative form” see [link](#). If a third country representative is based here in Ireland, they must have an office premises located here so that DAFM can go and inspect all documentation pertaining to the third country company that they are representing eg HACCP plan, traceability, customers, labelling etc. A PO box address is not sufficient.

### Preparing for Brexit – Feed Labelling

The following must be stated from Jan 2021 on all feed labels i.e. materials, compound feed, feed additives, premixtures, medicated feed & former foodstuffs imported from GB (i.e. England, Wales or Scotland)

1. The name and address of the Third country representative
2. Third country representative number
3. The UK manufacturer approval number



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## WHATS ON

Nov	<u>Teagasc Events</u>
Nov 3 <sup>rd</sup>	Sustainability Committee
Nov 16 <sup>th</sup>	DAFM
Nov 18 <sup>th</sup>	Feed Safety Management
Nov 17 <sup>th</sup>	BAFSAM
Dec 1 <sup>st</sup>	Feed Committee Meeting

## USEFUL LINKS

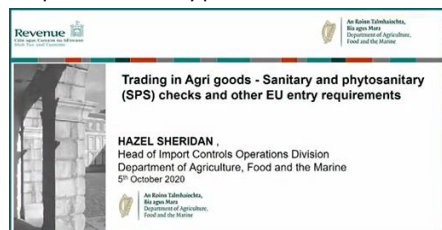
IGFA Covid 19	Gov Covid 19
HSE Covid 19	CDC Covid19
Crop Forecast	Irish Fbo's
Protein Balance	Fbo Forms
Oeju	Dafm Brexit
Fsai Amr	Dafm Amr
<u>Compound feed Labelling Code</u>	
Dafm Trader Notices	Pig Innovation
<u>WASDE</u>	

## RASFF Oct 2020

Total Food & Feed	402
Food	363
Food Contact Materials	9
Total Feed	30
Feed Materials	20
Feed Premixtures	1
Feed Additives	0
Compound Feed	7
Nuts, products and seeds	0
Pet food	2

## Preparing for Brexit – Importing Animal Feed

Import controls have been in place since the European single market began in 1993 and are laid down in European regulation. These controls are in place to ensure products coming into the EU meet the same requirements of products manufactured and placed on the market within the EU (level playing field and food/feed safety controls). The basic requirements are companies/individuals who wish to import animal feed into Ireland must be registered with DAFM as an FBO and [Importer](#). This [link](#) outlines the requirements of an import of all types of animal feed.



Some animal feed may however require additional checks called SPS checks. Sanitary and phytosanitary (SPS) measures are measures to protect humans, animals, and plants from diseases, pests, or contaminants.

See [link](#) to recent webinar. In this recording from Revenue Brexit Readiness Live Streams, DAFM expert Hazel Sheridan gave a presentation on Trading in Agri goods - Sanitary and phytosanitary (SPS) checks and requirements.

## Preparing for Brexit – Training

Brexit negotiations continue despite many twists and turns during the month of October. DAFM has launched a new Brexit campaign [page](#). The Department is organising a series of [events and webinars](#) on specific topics. Many of these will be recorded so they can be viewed online afterwards [here](#). On 4 November at 2pm Department officials will give another presentation on [importing animals and products of animal origin](#). Registration can be done on the above pages.

## Preparing for Brexit - New Automated Imports System (AIS)

Revenue's new customs import system - Automated Import System (AIS) - was scheduled to become operational from Monday 2 November. AIS is the first of a suite of new Customs related IT systems that are being implemented by Revenue over the next number of years to ensure full compliance with the provisions of the Union Customs Code (UCC). Revenue has had extensive and very positive engagement with trade, business and software developers in preparation for the introduction of AIS and many businesses are now ready for implementation of the new system. Revenue, however, recognises that some businesses involved in regular imports are particularly challenged to be ready for 2 November, despite very positive engagement and extensive work undertaken and completed.

In recognition of these challenges and to ensure the most efficient switchover to the new system, the launch date has been deferred by a period of three weeks to [Monday 23 November](#). Revenue will continue its positive engagement with the businesses concerned in the interim to ensure that AIS is fully operational for all businesses [from 23 November](#). If a business needs further information as regards readiness for AIS, please contact the e-Customs Helpdesk on [-JCCITDev@revenue.ie](mailto:JCCITDev@revenue.ie)

## Walsh Scholarships Programme

Teagasc, in partnership with national and international institutes, have a long and prestigious history of successful doctoral and masters training and development, and an ever-expanding network of Walsh Scholar alumni. 'Walsh Scholars: The Next Generation' is a public showcase of Teagasc's leading postgraduate agri-food research and will be held on 5 November, 2020 11:00 AM. If you are interested in attending this webinar please register [here](#)

## Strategy for the Reduction of Methane Emissions

The EU Commission published a strategy on the above, which considers enteric fermentation and manure management. Among the key measures is the development by end of 2021 of an inventory of best practices and available technologies, including feeding strategies. The reduction target for total EU emissions of

methane, is 50% by 2030. The strategy puts emphasis on improvement of reporting of emissions from agriculture through better data collection and on the CAP as a tool to reduce emissions. The main focus will be on best practice sharing for innovative methane-reducing technologies, animal diets and breeding management. Targeted research on technology, nature-based solutions and dietary shift will also contribute. An expert group will be established in early 2021 to analyse life-cycle methane emission metrics. It will look in particular at the extent to which specific livestock management and animal welfare practice can affect methane emissions. The strategy paper points in particular to the biggest potential for reducing emission intensity offered by novel approaches to feeding. The characteristics of feed and feed management measures will be investigated.

## **CAP Reform Entering Final Stages**

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Both the European Parliament and the Agriculture Council have agreed their respective positions on the future CAP reform. Over the next few months work will continue to bring the 2 positions closer together and thrash out the finer detail of the future policy. The European Parliament agreed that at least 30% of the direct payments budget should go to eco-schemes which would be voluntary for farmers and focused on improving environment, climate and animal welfare. EU Agriculture Ministers at the Council however want to ring fence 20% of the direct payments budget for these eco schemes which they want to be mandatory for farmers. They also want members states to have flexibility to decide how to reach the environmental goals. On the issue of coupled income support the Parliament favours allowing an allocation of 10% of the total income support plus an additional 2% to specifically support the production of protein crops. EU Agriculture Ministers want 13% plus 2%. The new CAP will not come into force until 2023 due to delays agreeing other overarching EU policies including the EU Green Deal, Farm to Fork Strategy, Brexit and the long-term EU Budget.

## **Technical News**

### **Zilpaterol Feed Contamination**

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Members will be aware of the detection of a prohibited substance zilpaterol (22 µg/kg - ppb) in sugar cane molasses from South Africa. Zilpaterol is a beta-agonist authorised in certain countries (Mexico, South Africa, USA) as a growth promoter. It is prohibited in the EU. On 9 October samples were taken by the Irish authorities on molasses from South Africa and found positive with traces of zilpaterol. The consignment at stake was distributed in IE and the UK. DAFM ordered a recall of the molasses. A risk assessment by the Irish Food Safety Authority concluded that the levels in the molasses and the estimated carry over to food and feed did not constitute a food and feed risk. Similar steps were taken in the UK as the cargo was split consignment. Members are reminded that horses are food producing animals and as such come under the remit of the EU feed and food law framework regulations. This includes notifying in the first instance DAFM feed stuffs.

### **Lifting of Feed Ban for certain Processed Animal Proteins (PAP)**

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In legal terms this involves amending Annex IV to Regulation (EC) No 999/2001 as regards prohibitions concerning animal feeding. The Commission has decided it is not possible to develop a workable method of analysis of poultry PAP in poultry feed and pig PAP in pig feed. In the absence of a robust test method and quantification protocol, it is impossible to set a workable tolerance to allow for cross contamination. Therefore, the only option left to the TSE working group is to set strict rules on separate lines of production for feed mills. Only Mills making poultry feed and /or fish feed may use pig PAP and this pig feed may not contain milk products or porcine blood products (possible ASF Risk?). Lines producing pig feed and /or fish feed may be authorised to use poultry PAP. A similar situation is envisaged for insect meal whereby plants producing fish feed /and /or poultry feed and/ or pig feed will be authorised to use insect meal.

The discussion will continue in December around how to implement such a system. The intention of the Commission is to sign the proposal into law in June 2021. The EU feed industry supports the circular economy

objective, through the re-introduction of valuable sources of protein to the feed / food chain. However, with a zero-tolerance policy (due to lack of robust test methods) and the need for strict separation at feed mill stage, the use of PAP within the EU may, in practice, be limited. IGFA has raised the matter with supermarkets and is aware that there remains resistance from the chains to permit the return of PAP.

On insect meal, members should be aware that the insect sectors and the former food stuff (FFS) manufacturers are requesting the Commission to permit the use of FFS containing meat as a rearing substrate.

## Undesirables Substances Directive - Mycotoxin:

The Member States and the Commission continue to deliberate over the reduction of guidance limits for (some) mycotoxins and the introduction of legal limits for finished feed. The intention of authorities to switch from guidance values to maximum limits in complete feed while maintaining guidance values for feed materials is being opposed by FEFAC and Member Associations.

In the meantime, members are reminded that maximum levels for **Aflatoxin B1** for feed already exist. These levels are not under review. The presence of Aflatoxin B1 in maize is linked to particular climatic conditions during the growing and storage of the maize crop. It is a naturally occurring contaminant and once the crop is infected intensive testing and segregation of the crop is the most effective control. The maximum levels for aflatoxin may be found in Directive 2002/32 Annex 1 section 11 (current consolidated version: [28/11/2019](#)) or see table below. Given the importance of the dairy industry in Ireland members should note the maximum legal level permitted in compound feed for milk producing cows is **5 ppb**



### Aflatoxin in Feed Legislation - Legal Limit (2002/32)

Commodity	Maximum Level (B1)
Feed Materials	20ppb
Complete & Complementary feed	10ppb
<b>EXCEPT:</b>	
Compound feed for <b>milk producing</b> cows, sheep, goats and young pigs poultry, calves and lambs and kids.	5ppb
Compound feed for adult cattle sheep goats pigs poultry	20ppb

IGFA members are reminded that it is their responsibility as feed businesses if they have evidence of, or suspect a feed safety incident involving feed under their control to notify the competent authority (General Food Law (EC) No 178/2002 article 20 part 1-3) Current consolidated version: [26/07/2019](#)

## Animal Health

### Sales of Antibiotics for Use in Animals

The 2018 European Surveillance of Veterinary Antimicrobial Consumption (ESVAC) report has just been [published](#). It shows that sales of antibiotics for use in animals in Europe fell by more than 34% between 2011 and 2018. Of particular importance, the veterinary sales of antibiotics considered critically important

in human medicine present a decreasing trend. However, Ireland has an increasing trend in sales of 3<sup>rd</sup>/4<sup>th</sup> generation cephalosporins from 0.1 to 0.2mg/PCU.

Out of the 25 countries that provided data covering 2011-2018, 18 countries observed a decline in sales of veterinary antibiotics with overall sales down by more than 5%. The substantial decline in some countries indicate that there is also a potential for a decrease in other countries. The UK has shown a dramatic reduction in sales to 29.5mg/PCU, attributing this mainly to reductions achieved in the pig sector.

In 2018 Ireland reported sales of antimicrobials at 46mg/PCU, a minor decrease in the overall sales of veterinary antibiotics compared to 2017. A review of the previous year's sales indicates that the overall trends are generally consistent between the years with small fluctuations.

## African Swine Fever (ASF)



ASF is a viral disease that affects domestic pigs and wild boar. The virus is harmless to humans but has caused significant economic disruption in many countries. There are currently no vaccines for ASF, so an outbreak can necessitate the slaughter of large numbers of farm-kept pigs in affected areas. Ireland is currently free of ASF and ensuring we remain that way is vital to protect our pig industry.

On 10 September a first case of ASF in a wild boar population was detected in Germany. By 1 November, 123 cases have been confirmed, all in wild boar. Domestic pig herds in Germany are still free of ASF.

## Avian influenza (HPAI) in Europe

Avian influenza (also called 'bird flu') is a viral disease that primarily affects poultry and wild fowl. Domestic chickens and turkeys are very susceptible to the disease, which is fatal in most infected birds. However, aquatic fowl (ducks etc.) may have greater resistance to the disease. These aquatic fowl may therefore act as a reservoir for the disease, perpetuating transmission of the virus to other birds. There is a constant risk of avian influenza being introduced into Ireland from wild birds particularly from October onwards each year as this is when migratory birds arrive and congregate on wetlands, mixing with resident species.

- Highly pathogenic avian influenza **HPAI** can have up to 100 % mortality in affected flocks.
- Low pathogenic avian influenza **LPAI** generally, causes mild disease in affected birds.



On 20<sup>th</sup> October, the Netherlands confirmed Highly Pathogenic Avian Influenza (HPAI H5N8) in a Mute Swan which was found dead in a wetland area in the Greone Hart region of Central. A second case of HPAI H5N8 was confirmed in a Eurasian widgeon found in the coastal area of the country on 26<sup>th</sup> October. These were the first cases of Avian influenza confirmed in The Netherlands in 2020.

On 29 October the Dutch animal health authorities announced a cull of 35,700 broiler chickens after an outbreak of HPAI H5N8 at a poultry farm in the eastern village of Altforst. Other poultry farms in the area are under surveillance and measures and restrictions put in place to limit exposure of birds. Authorities have been keen to highlight that the disease is highly contagious for birds, but risk of transmission to humans is considered low. The disease poses no food safety risk for consumers - properly cooked poultry and poultry products, including eggs are safe to eat.

On Monday 2<sup>nd</sup> November Animal and Plant Health Agency (APHA) have confirmed two separate cases of HPAI avian flu in England. Avian influenza of the H5N8 strain has been confirmed at a premise near Frodsham

in Cheshire today. All 13,000 birds at the farm will be humanely culled to limit the spread of the disease. 3km and 10km temporary control zones have been put in place around the infected site to limit the risk of the disease spreading. On the same day LPAI H5N2 strain has been confirmed in at a small commercial premises near Deal in Kent. All 480 birds on site will be humanely culled to limit the spread of the disease. A 1km Low Pathogenic Avian Influenza (LPAI) Restricted Zone has also been put in place around the infected farm to limit the risk of the disease spreading.

It is important to note HPAI H5N8 was last detected in Ireland in 2016/2017 when 12 wild birds were confirmed with the disease including Eurasian widgeons, mute and whooper swans and a grey heron. The latest updates and biosecurity advice published by DAFM on avian flu was on 28 October [here](#).

## Igfa Frequently Asked Questions

### Must veterinary practices be approved to retail feed additives?

Yes, anyone retailing any feed type (additive, premixture, feed material, compound feed etc) must be either approved or registered. The list of retailers (approved and registered on DAFM Website was updated on 31<sup>st</sup> August 2020. Since 31<sup>st</sup> August there has been a further 5 retailers approved and 3 retailers registered which are not on the list yet.



### If an IGFA members encounters a situation whereby a company is not on the list but retails any feed type who they should notify?

They should notify [Feedenquiries@agriculture.gov.ie](mailto:Feedenquiries@agriculture.gov.ie)

### How many types of feed additives are there on the European Register of Feed Additives?

There are five feed additives categories

1. technological additives: any substance added to feed for a technological purpose
2. sensory additives: any substance, the addition of which improves or changes the organoleptic properties of the feed or the visual characteristics of the food derived from animals.
3. nutritional additives.
4. zotechnical additives: any additive used to affect favourably the performance of animals in good health or used to affect favourably the environment
5. coccidiostats and histomonostats

### What are feed additive functional groups

Within the five feed additives categories above feed additives are further divided into what are called 'functional groups.' For example, technological additives have 15 functional groups including (a) preservatives (b) antioxidants (c) emulsifiers etc. Sensory additives have 2 functional groups and so on. For a list of all the functional groups see Annex 1 of Regulation [\(EC\) No 1831/2003](#). When you click on regulation links make sure you click on "current consolidated version" to access the LATEST revision.

Before you go enjoy a virtual farm visit recorded by US grains last week [here](#)

