

FEED ISSUES

IGFA MONTHLY NEWSLETTER

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General News

Preparing for Brexit

The Government published a Brexit Readiness Action Plan at the start of September to help prepare all sectors for the end of the transition period. The strong message is that, whatever happens with the Brexit negotiations, from 1 January there will no longer be the current seamless trade and movement of goods between the EU and the UK. The UK will be outside the EU's Single Market and Customs Union and from that date **any business, regardless of size, who moves goods from, to or through Great Britain will be subject to a range of new customs formalities and other regulatory requirements.**

Preparation is therefore essential and Government wants to ensure that businesses plan and organise to limit disruption. The key messages are to

- o Read the [Brexit Readiness Action Plan](#).
- o Register with the Department of Agriculture, Food and the Marine as an importer/exporter and you may also need to arrange registration on TRACES. In both instances please contact brexitregistration@agriculture.gov.ie
- o Register with Revenue/obtain an EORI number if you haven't already done so.
- o Familiarise yourself with the SPS controls that will come into effect in January, full information is available online at www.agriculture.gov.ie/brexit
- o Wider Government Brexit information is available through www.Gov.ie/brexit
- o DAFM specific information is also available via telephone (076) 1064443 or email to Brexitcall@agriculture.gov.ie
- o The European Commission is updating its 102 sector-specific Readiness Notices. See [here](#) for the notice on animal feed.

The Northern Ireland Protocol provides that Northern Ireland is legally part of the UK customs territory but subject to certain provisions of EU law. To avoid a hard border these provisions, include the EU customs code and EU legislation across a range of areas. This is necessary to protect the integrity and operation of the EU's Single Market in goods and means that goods from Northern Ireland will have free and open access to the EU Single Market. As things stand, there should therefore continue to be the free flow of goods between Northern Ireland and the Republic of Ireland and vice versa with no customs requirements or payments of duties in either direction. Necessary checks and controls (including on SPS goods) will take place on goods entering Northern Ireland from the rest of the UK and other third countries.

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WHATS ON

Oct	Teagasc Events
Oct 13 th	Fefac Premix Meeting
Oct 14 th	Animal Nutrition Meeting
Oct 28 th	Indust Compound Feed
Nov 3 rd	Sustainability Committee

USEFUL LINKS

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

RASFF SEPT 2020

Total Food & Feed	327
Food	296
Food Contact Materials	11
Total Feed	20
Feed Materials	14
Feed Premixtures	1
Feed Additives	1
Compound Feed	1
Nuts, products and seeds	0
Pet food	3

Preparing for Brexit - Training

A number of Departments and Agencies are running training programmes to help businesses understand the implications of Brexit when trading with Northern Ireland and GB. This training is free, open to all and many of the courses give the opportunity to ask more specific questions.

- Skillnet Ireland's free [customs training](#) is open for applications. A Clear Customs app is also available.
- Revenue is running Brexit guidance sessions online on Monday 5 and 6 October. See [here](#) for more details. You can reserve a place on a particular session or reserve full day pass. All sessions, except the opening contextual session, are being recorded and will be available on the Revenue website.
- Local Enterprise Offices are running 'Prepare Your Business for Customs' workshops throughout the year and they're open to ALL businesses, across ALL sectors and ALL industries. More details [here](#)
- Other Brexit training events can be found on [here](#)

Ready for Customs Grant

The government announced in July that Enterprise Ireland will manage a new €20m fund to assist Irish businesses with customs issues. A Ready for Customs Grant is being made available to companies which are directly engaged in business activities to, from, or through the UK and to help them increase their capacity to manage the customs process.

- Up to €9,000 is available for each new full-time employee engaged in customs work.
- If you employ a new person to deal with customs on a part-time basis a grant of up to €4,500 is available.
- This grant contributes to recruitment costs, employee costs and provision of IT infrastructure.



Further details are available [here](#)

FEFAC Feed Sustainability Charter 2030

FEFAC launched a [Feed Sustainability Charter 2030](#) at its annual congress on 25 September. The charter aims to highlight the measures that feed companies across Europe are taking to improve the sustainability of our industry and the digitally livestreamed Congress was an opportunity to debate the contents of the document. The ambitions and commitments in the charter are based on key themes including climate neutral production, nutrient Efficiency, responsible sourcing practices, improving animal health & welfare and socio-economic measures.

A panel of representatives from industry, farming and the European Commission debated the various themes at the congress but much of the focus was on sustainable sourcing policies. Some of the panellists stressed that more must be done by the European feed industry to address deforestation and the Commission underlined that we must guarantee that imported products such as soy do not undermine EU ambitions on climate change. The need for full traceability and trusted certification within the supply chain was also emphasised. In response FEFAC President Asbjørn Børsting said "We recognise that a deforestation free soy supply chain is a key priority for our industry and we're working hard on the upgrading of the soy sourcing guidelines to facilitate a mainstream market solution to achieve that goal".

Teagasc - New MACC for Ammonia Emissions

Teagasc is hosting a [webinar](#) on 7 October that will explain the results of its recently published new marginal abatement cost curve (MACC) for ammonia emissions. The full publication '[An Analysis of the Cost of the Abatement of Ammonia Emissions in Irish Agriculture to 2030](#)', looks at various ways to reduce ammonia emissions and the costs involved.

The paper looks at reducing animal N intake through a reduction in crude protein in concentrate feed from pages 58 to 64.

Covid 19 - Cleaning In The Workplace



DAFM inspectors will work with the HSA to inspect for compliance with the Return to Work Safely Protocol in premises where they carry out routine inspections ([Trader notice 4](#)). IGFA asked DAFM if they could provide us with details on what protocols were required for cleaning in the case of an employee testing positive for Covid 19. They advised that cleaning queries should be directed to Public Health/HSE if there is a Covid case and

that they would only be checking if the FBO has

1. COVID contacts register
2. return to work safely protocol document
3. a nominated Lead Worker Representative
4. controls in place to stop the spread of the disease
5. training for all staff on Return to Work safely Protocol

The following are some useful links to cleaning protocols

[CDC](#)

[Centres for Disease Control and Prevention USA](#)

[ECDC](#)

[European Centre for Disease Prevention and Control](#)

[NSAI](#)

[National Standards Authority Ireland](#)

[HSA](#)

[Health and Safety Authority Ireland](#)

Technical News

Outcome of Sept. SCoPAFF meeting

Mycotoxins

Last on the meeting agenda, was the discussion whether to switch from guidance values to maximum limits for mycotoxins in compound feed. The majority view could be in favour of a maintaining guidance values for compound feed but also with a reduction of the guidance values themselves, in particular for DON. Only one country, Denmark, proposed a standstill situation to assess how the Green Deal will affect the incidence of mycotoxin and other toxins in the EU cereals. This matches well the message that FEFAC, Copa-Cogeca, FoodDrinkEurope, COCERAL and Euromalt conveyed at the last Mycotoxin forum. These reflections meanwhile gained support from more organisations of the food and feed chain and will be forwarded to Commissioners Wojciechowski and Kyriakides within the next days. Further discussions regarding levels in feed are scheduled at a meeting of the SCoPAFF on feed contaminants on 9 October 2020, where a political decision may be taken, paving the way to a stakeholder's consultation with a meeting of the mycotoxin forum dedicated to feed possibly in the first half of November.

Re-authorisation of ethoxyquin

A proposal for a prolongation of the suspension of authorization of ethoxyquin until end of 2022 will be proposed at the November SCoPAFF meeting for vote likely in December 2020. In principle, all missing information has been submitted to FEEDAP and the revised EFSA opinion should be available in first half 2021, paving the way to a decision before end of 2021. However, it cannot be excluded that EFSA will ask for more information, hence the margin taken by the EU Commission.

Carry-over of ethoxyquin

Member States reported several cases of detection of ethoxyquin in feed (RASFF notifications concerning fish meal, fish oil, shrimp meal or carotenoids). Member States asked for a harmonised approach to differentiate what results from carry-over in plants located in Third Countries where ethoxyquin is still authorised and deliberate admixtures. One option that is considered is to define a maximum level of p-phenetidine below which the presence of ethoxyquin could be considered as resulting from carry-over. The JRC has been asked to speed up the procedure for the validation of a method of quantification of p-phenetidine at low level and FEFAC and IFFO were asked to help with the provision of samples of fish meal and fish feed.

Catalogue of feed materials

SCoPAFF is still struggling with the new structure proposed by the EU Feed Chain task Force regarding fermentation products and is also considering establishing maximum content for THC and CBD in hemp derived products; this may further delay the vote on the 4th upgrade of the EU Catalogue of Feed Materials

Clarification of the status of certain feed ingredients

The draft Regulation clarifying the legal status of greyzone products will be shortly notified to SPS and is expected to be voted at the SCoPAFF of December. This Regulation will establish that sodium citrates, potassium citrates, sorbitol, mannitol and calcium hydroxide that were listed until now both in the register of feed additives and in the EU Catalogue of Feed Materials are non-authorized feed additives but a relatively long transition period (7 years) should be provided to give a chance to applicants to lodge a dossier for authorization as feed additive

ID numbers for amino acids

Until now, when for the same substance, several strain specification applications were lodged to EFSA, sometimes asking for use in feed and water, sometimes only in feed, authorities used to grant different ID numbers (case of lysine sulphate, tryptophan or valine). Upon request of FEFAC, the Commission proposed to grant a single ID number as from now. However, Member States refused to go that route for the time being.

The next SCoPAFF meeting will take place on 12-13 November 2020.

Other Regulatory Updates

Dietetic Feed – New Regulation

On 4 March 2020, the European Commission published Regulation 2020/354, repealing Directive 2008/38/EC. It shall apply from 25 December 2020 with transition periods outlined within the regulation.

Refit of the Feed Additives Legislation

The European Commission is still evaluating the legislation on additives for use in animal nutrition as part of its fitness check of general food law, REFIT. There has been a number of updates to the Feed Additives Regulation (EC) No 1831/2003 however prior to this, it had not undergone an evaluation since its entry into force in October 2003. The Commission will launch another consultation phase in September 2020 to collect opinions and economic data as input for the Impact Assessment of the future EU feed additives legislation. We expect a new feed additive regulation by the end of 2021.

GMO feed issues with Russia

Earlier this year, Russian authorities sent warning letters to the Netherlands, Belgium, Spain, Italy and Germany reiterating their observations of non-compliance with its GM law. They also threatened to restrict access to their market. In July, Russia imposed a complete export ban on Dutch feed and feed ingredient imports even though only 3 companies were identified as not complying with the GM requirements. FEFAC is in direct contact with the Commission to discuss the situation. The Commission has advised companies of the requirement **not** to agree to any bilateral protocols with Russia, as this is the sole responsibility of the European Commission. They have also warned companies not to commit to any additional requirements from the Russian authorities. Michael Shields from Redmills is leading on this issue for the IGFA.

Organic Farming

Regulation (EU) 2018/848 on organic production and labelling of organic products repealing Regulation (EC) No 834/200 has been postponed until 1 January 2022.

Organic farming Vitamin B2

FEFAC was alerted by certain Member Associations that their authorities would no longer tolerate the use of B2 not complying with organic farming rules (use of GMOs in organic production is prohibited production). The only solutions available to the feed industry were (1) a microbial biomass rich in vitamin B2, placed on the market as feed material and notified to the Register of Feed Materials (2) Vitamin B2 produced by fermentation and subject to an application for authorisation as feed additive submitted to EFSA

The problem with solution (1) is the volume of biomass placed on the market as feed material is largely insufficient to meet the demand and the legal status remains unclear, which encourages neither the present supplier to scale up production, nor other potential producers to place similar products on the market. The problem with solution (2) is material will not be accessible until an authorisation as feed additive is delivered. FEFAC wrote to the Commission asking for clarification of a) the legal status of biomass rich in B2 and b) for provisional authorization of the feed additive fitting with organic farming rules for which a dossier was lodged to the EFSA. The Commission responded on 14 September indicating there is no short-term solution, but provided some indications that the assessment of the potential feed additive is being performed by EFSA as a matter of priority with a possible outcome within the next month.

New Breeding Techniques – Detection of Non-Detection

A recent study into the development of detection methods for genome edited Canola was published in [Journals food volume 9](#). The study was picked up by media outlets and VLOG "Ohne Gentechnik" "GMO-free" Standard stated that: "The new detection method is a milestone for the protection of consumers, food production and agriculture in the EU. The authorities now have the option of actually identifying new, non-approved GM plants as such. This allows manufacturers and marketers at all levels - from beekeepers to farmers, breeders to the feed and food industry - to keep their supply chains free of these novel genetic organisms and thus to meet the growing consumer demand for GMO-free food in the long term."

The German competent authority BVL has subsequently published an official statement regarding the "Greenpeace funded -Study" and the development of a detection method for genome edited plants.

The main messages are:

1. The method described in the study can specifically detect this mutation in the Canola varieties.
2. It cannot identify whether it has actually been created by genome editing in the Canola lines
3. This method alone cannot provide a legally binding result in official controls of food and feed for unintended GMO content

This reality was already known from the JRC work on detection methods. BVL concludes that the detection method described in the study is capable of detecting herbicide-tolerant canola lines with a specific point mutation, but cannot specifically distinguish whether the detected mutation can be assigned to a canola line that was generated using ODM (oligonucleotide-directed mutagenesis). The study is therefore a method development that can detect mutations but cannot distinguish between Canola lines produced by different breeding methods. The specific detection of a point mutation has been technically possible for decades and is no novelty for science. Rather, the difficulty is to clearly identify organisms developed with new genomic techniques and to analytically prove that changes were produced by genome editing. Furthermore, the study does not provide a solution on how to detect a point mutation generated by genome editing if the producer or breeder has not provided information or a publication about this fact.

Update on French Decree on Mutagenesis (May 2020)

IGFA members are reminded that in May 2020, the French proposed a ban on crops produced by in vitro mutagenesis. IGFA submitted comments on the proposal within the EU Commission TRIS system along with many other stakeholders. The EU Commission and 7 member states have now submitted comments objecting to the implementation of the French draft Decree on in vitro mutagenesis. The standstill period is now extended until 9 November 2020 during which France should not implement this draft decree. The Commission has reminded the French government that if France does not comply with the obligations under Directive 2015/1535 or if the text of the proposed draft technical regulation is adopted, without taking account of the objections raised, the Commission may commence infringement proceedings. We will watch the evolution of the situation over the next few months.

Glyphosate in Soybeans (revision of the MRL)

Glyphosate-based herbicides, have proven to be efficient, safe and cost-effective weed control products since the 1970s. These products are currently authorised in more than 100 countries, including all 27 member states of the EU. In 2012, producers of glyphosate submitted a renewal dossier in the EU and the active substance was renewed

for just 5 years in 2017. The Glyphosate MRLs are currently undergoing a routine review which is a standard part of the risk assessment process after an Active Substance is registered in the EU. As part of the review process EFSA produces a "reasoned opinion" (RO).



In October 2019, EFSA published an updated RO for glyphosate MRLs and proposed an MRL of 5 ppm for soybeans. The data used to generate the MRL was based on EU usage pattern for the herbicide on conventional soybeans. The EU oil crushing and importing industry indicated that to safely import soybean they will need an MRL of 20 ppm to deal with the usage pattern of glyphosate in third countries on soybeans. Two requests for Import

Tolerances of 20 ppm for soybean have been submitted and the reasoned opinions are expected within 6 months. Industry stakeholders have requested their member states to ask the commission to delay final discussions on the MRL for glyphosate until the data from the Import Tolerance dossiers has been evaluated by EFSA. DAFM is supportive of the industry position.

Medicated Feed

Ireland's National Action Plan on Antimicrobial Resistance (iNAP) is part of Ireland's One Health Strategy which recognises that humans and animals share the same environment and that joint action is needed to deal with the AMR threat to public health, animal health and the environment. iNAP is based on the five strategic objectives in the 'WHO Global Action Plan on AMR'. iNAP involves co-ordinated multi-stakeholder involvement. IGFA, as one of the stakeholders in iNAP, has requested that a training workshop for vets on medicated feed manufacture including medicated feed premix datasheets (some are quite complex) be included as a project for iNAP2.

IGFA has again this month requested a public consultation on the new medicated feed [Regulation \(EU\) 2019/4](#) which will apply from 28 January 2022. DAFM have responded and advised they are meeting internally at the beginning of October to discuss the issue and will advise us of the outcome of that meeting. The following are main topics within the regulation we need to focus on

1. Is it a feed?
2. What is homogeneity?
3. What level of cross contamination is permitted?
4. Who is responsible for scripts?
5. How will unused medicated feed be dealt with?

Animal Health

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. Although ASF does not affect humans or other animal species

and meat from pigs does not pose any food safety risk, the virus can survive for months or even years in pork and pork meat products including cured meats, hams, sausages and salamis etc. If pigs eat food waste that contains infected meat it will cause an outbreak of the disease. **Remember it is illegal to feed food waste containing meat to farm animals as it can spread ASF as well as other diseases such as Foot and Mouth Disease. Dispose of food waste carefully in a secure bin away from animals.**



On 10 September a first case of ASF in a wild boar population was detected in Germany, 6 km away from the Polish border. A surveillance zone (15km diameter) and a protection zone (3km diameter) was set up. The protection zone will be fenced. No pig farm is located in the protection zone and only 20 or so in the surveillance zone. No restriction has been set on feed deliveries to pig farms. The European Farmers Association, Copa-Cogeca, issued a reassuring message pointing to the readiness of the German authorities to deal with the situation and the quick reaction See [link](#)

With regard to readiness EFSA has begun a major campaign to raise awareness and help halt the spread of ASF in south-east Europe. **Detection, prevention and reporting** are key to curbing this deadly disease. See [link](#) for more information or watch this 25 second [video](#) which gives an excellent summary.

On another note, FEFAC was informed by EFSA that the report on the risk of transmission of ASFv via different matrices, including feed, expected to be released in June 2020, is now foreseen for the end of 2020. Several scientific papers have been published recently regarding the risk with feed matrices i.e. [porcine plasma](#)

Avian influenza (HPAI) in Europe

Avian influenza or "Bird Flu" is a contagious and often fatal viral disease of birds. Wild birds, particularly wild migratory water birds are considered to be the main reservoir of avian influenza viruses. There is a constant risk of avian influenza being introduced into Ireland from wild birds particularly from November onwards each year as this is when migratory birds arrive and congregate on wetlands, mixing with resident species.

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

There have been no further updates published by DAFM on avian flu. If you missed the last one which we noted in IGFA July Feed Issues click [here](#).



Igfa Frequently Asked Questions

How will I know if a regulation is the latest version?

1. Log on to <https://eur-lex.europa.eu>
2. Select EN for English version
3. Key in e.g. EC 767/2009 in quick search bar
4. Click current consolidated version

● In force

Current consolidated version

How will I know if a regulation is in force currently?

When you access legislation, you will see a green dot which signifies it is in force. If it is not in force, you will note a red dot.

Example Official Controls

Click [here](#) ● In force and [here](#) ● No longer in force

