



F E M A S

Distillery & Malt By-products

FEED MATERIALS ASSURANCE SCHEME

DISTILLERY & MALT BY-PRODUCTS SECTOR NOTES

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NOTE: Although these Sector Notes may be translated into various languages for the convenience of users, the English version remains the definitive reference document in the event of any dispute.

NOTES ON THE IMPLEMENTATION OF FEMAS FOR BUSINESSES PRODUCING DISTILLERY & MALT BY-PRODUCTS

Sector Notes are provided to assist FEMAS participants and assessors in establishing some background knowledge of specific feed industry supply sectors where issues may exist that are uncommon, or of less relevance, in other sectors. These Notes are not necessarily exhaustive.

These Sector Notes are relevant to businesses involved in the production of distillery and malt by-products for use in animal feed (including: draff, pot ale, pot ale syrup, dried distillers grains, malt culms, malt residual pellets, small grains/screenings).

These Notes are laid out in the same format as the FEMAS International Core Standard. Where additional comment is necessary, the clause reference is to the appropriate section of the FEMAS International Core Standard. It is emphasised that the comments included in this document are intended to assist in the application of the corresponding requirements of the FEMAS International Core Standard and are not to be considered in isolation. For clauses where no additional comments are provided in this document, the original requirements of the FEMAS International Core Standard continue to apply without any additions or exclusions.

In subsequent issues, additions and amendments to these Notes will be shown in *blue italics*, for ease of reference.

The expert knowledge and assistance of members of the UK Malt and Distilling Industries in preparing these Sector Notes is gratefully acknowledged.

1.10 Definitions

By-product (Co-product): *Product produced as the result of a process primarily intended to produce a different product.*

Distillery & Malt By-Products: *By-products derived from the production of malt and distilled spirits for human consumption, including: draff, pot ale, pot ale syrup, dried distillers grains, malt culms, malt residual pellets, small grains/screenings.*

For additional definitions refer to FEMAS International Core Standard

SECTION 3 RESOURCES AND GOOD HYGIENIC PRACTICES

3.7 Driers / Drying

Traditional production methods for specialist Malt may involve the burning of peat to give distinctive flavour to certain brands of whisky. Where the smoke generated from peat burning is brought into direct contact with the Malt, participants must show that no additional hazards are created for feed ingredients derived from any Malt processed in this manner. In addition to potential chemical contaminants carried in the smoke, the effect on palatability of feed ingredients smelling of smoke must be given consideration and where necessary appropriate measures taken to avoid subsequent palatability issues.

3.15 Process Water & Water Used For Cleaning Purposes

Where Distilleries, Maltings and Dark Grains plants use sources of water within their processes, or for cleaning purposes, that are not derived from mains / town water, participants must be able to demonstrate that no microbiological or chemical hazards are increased by this practice.

The siting of many Distilleries besides streams or burns may make them vulnerable to flooding. In addition to the issues relating to direct damage from flooding, participants must consider within their risk assessment process any adverse effect on water quality during times of spate or flooding. Where necessary, appropriate controls must be implemented during and after periods of spate or flooding.

SECTION 4 TRANSPORT REQUIREMENTS

4.2.1 Transport of Bulked Goods

Where vehicles and trailers are truly dedicated to carriage of single products, such as Wet Draff or Pot Ale, there is no need to record the three previous loads carried by vehicles. Cleaning regimes for vehicles must however ensure that no hazards are created by accumulations of material in load compartments.

4.2.3 Inspections of Land Transport Prior to Loading

Where the health and safety of quality personnel would be put at risk by climbing onto road tankers to carry out internal inspections, participants must comply with one of the following:

- Allow safe access by provision of safety platforms from which inspections may be done
- Nominate and train drivers to undertake inspections (in which case records of training must be held)
- Utilise risk assessment methodology to put in place alternative controls that will ensure issues of cross-contamination can be avoided (e.g. by use of dedicated tankers). In any such assessment, consideration must be given to the potential effects of inadvertently mixing different grades of the same product.

SECTION 5 PRODUCT SAFETY MANAGEMENT

5.1.5 Hazard Analysis / Identification (CODEX Principle 1)

Where feed ingredients are derived as a consequence of producing another product, rather than being the main products of the business, particular attention must be paid to whether undesirable substances or contaminants may be concentrated in feed ingredients as a result of any processing undertaken.

5.2 Raw Materials

Producers of Pot Ale Syrup and Dried Distillers Grains may be drawing Distillery Products from both within the same group of companies as their own business, or from without. Regardless of the relationship with the supplying sites, risk assessments must be undertaken to establish the systems necessary to control potential hazards associated with suppliers. Risk assessments must be documented and appropriate controls implemented.

5.4.1 Raw Materials Suppliers

Where participants are purchasing cereals from non-assured sources, risk assessments must demonstrate that any additional potential hazards associated with non-assured cereals are under control. This may be demonstrated by the auditing of suppliers, additional testing regimes, or a combination of the two. Controls must ensure that both home grown and imported cereals are assessed for potential hazards and suitable controls implemented.

5.13.2 Sampling

The objective is that samples are retained for the period between production and consumption. Where it can be demonstrated that material is consumed fresh, shorter periods of retention than the *six* months prescribed in FEMAS may be appropriate. Where material is either pitted or ensiled then the samples will need to be retained for at least the six month period unless a risk assessment shows that it is all consumed earlier than this. The fact that material may lose its identity when pitted or ensiled does not affect this requirement.

5.13.5 Undesirable Substances

Participants' risk assessments must evaluate the potential hazards arising from naturally occurring toxins produced by moulds and fungi known to attack the cereal species being processed (for example Aflatoxins produced by the various *Aspergillus* species and mycotoxins produced by the various *Fusarium* species). Where identified as potential hazards by the HACCP study, appropriate measures must be put in place to ensure no statutory maximum limits for toxins are exceeded in any feed ingredients produced.

Seasonal conditions may increase the risk of mould or fungal attack in cereals. Participants must be aware of such potential hazards and have procedures in place to ensure that they are properly controlled.

Applicable Regulations

There are no specific regulations applicable to Distillery & Malt By-Products over and above those regulations that apply to all feed ingredients.