

The newsletter of the Trade Assurance Scheme for Combinable Crops

Finding your way through feeding stuffs regulations

Complex legislation, aimed at protecting the integrity of the animal feed industry supply chain, is now included in the revised Codes of Practice issued this year. The aim of this article is to help you comply with these regulations.

Section D2.4 of the Merchant's Code highlights the specific need for descriptions and labelling on feed supplies – which includes whole grains.

The requirement is as follows: *Delivery documents or labels for crops intended for feed use must comply with the Feeding Stuffs (England) Regulations 2005 (SI 2005 No. 3281).*

There is no doubt that the actual regulations, extending to some 80 pages, are daunting. However, compliance is essential for anyone involved in the merchenting, storage or haulage of feed supplies.

"The key is an adequate provision of a statutory statement, as required by regulation 9," says AIC Services' technical manager Garry Rudd. "This information can either be supplied on a label, or on the documents that accompany bulk products."

Just what has to be declared is set out in Schedules 2 and 3 of the Regulation.

"In Schedule 2, Part II provides a non-exclusive list of feed materials and column 2 provides the name that should be used on the product label or documentation. Where the unwary can be caught out is column 4, which identifies the necessary analytical declarations. This column may be blank for some ingredients – including whole cereals and oilseeds – but a declaration is still required," says Garry.

Schedule 3 details requirements for different feeding stuffs (para 11) and limited exemptions in para 12–15 (see panel). Additionally, the name from Schedule 2 plus additional parameters from column 4 are needed. This will include:



- 'feed material';
- moisture (if above 14% or lower if requested by purchaser);
- ash insoluble in hydrochloric acid (if this is above 2.2% in dry matter);
- the net quantity of the feed material;
- a reference to the 'original batch' where it is part of a divided batch; and
- the supplier's name and address.

Exemptions

- Para 12 a) allows for written notification from the purchaser that they don't require certain particulars
- Para 12 b) applies to feed for pet animals in quantities of less than 10kg
- Para 13 covers direct imports from third countries
- Para 14 covers trade between farmers
- Para 15 exempts feed materials greater than 50% moisture

Feeding stuffs regulations can be found on the web at:
http://www.opsi.gov.uk/si/si2005/uksi_20053281_en.pdf

Agribusiness ²⁰⁰⁸

Assessing the Climate, Making the Change

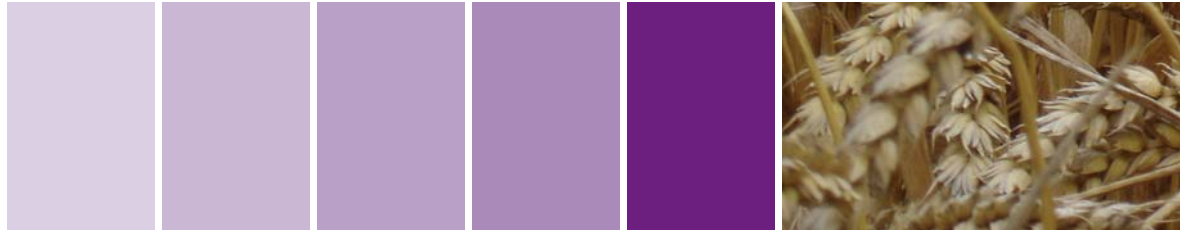
The essential climate change conference for the agrisupply industry.

14th November 2007
East of England Showground,
Peterborough

Guest speakers: Lord Rooker;
Rt Hon John Gummer; Dr Jeremy
Tomkinson, National Non-Food
Crops Centre; Richard Ellis,
Chairman, EEDA; the Carbon
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TASCC HAULAGE

Drivers' hours – update

The EC Drivers' Hours Regulations came into force on 11th April 2007. Key changes are as follows:

Daily driving

The daily driving time shall not normally exceed 9 hours, although the daily driving limit may be extended to at most 10 hours, not more than twice during the week.

Increases to 10 hours daily driving no longer require any compensatory daily rest to be taken.

Weekly driving

The weekly driving time shall not exceed 56 hours and shall not result in the maximum weekly driving time laid down in the Road Transport (RT) Directive 2002/15/EC being exceeded.

Several Member States will have to review their legislation to incorporate this social advance. It complements the RT (WT) Regulations 2005 legislation that should be in force in all Members States by now, limiting the working time for professional drivers to an average of 48 hours a week over a four-month period.

Previously there was no weekly driving limit specified as part of EU drivers' hours legislation.

Fortnightly driving

Maximum 90 hours in any two consecutive weeks. *Previously maximum 90 hours in any fortnight.*

Breaks from driving

45 minutes break in – or immediately following – 4½ hours driving can be broken down into an initial minimum period of 15 minutes, followed by a 30 minute break period.

Previously could be broken down into 3 minimum periods of 15 minutes.

Daily rest

11 hours daily rest may be replaced by a reduced daily rest if it is at least 9 hours – a reduced daily rest may be taken up to 3 times between any two weekly rest periods – no compensation required.

Previously compensation for reduced daily rest was required.

Weekly rest

Regular weekly rest period is 45 hours, which can be reduced to a weekly rest period of at least 24 hours in alternate weeks. Any rest taken as compensation for a reduced weekly rest must be made up by the end of the 3rd week following, attached to a rest period of at least 9 hours.

Previously 45 hours regular weekly rest could be reduced to 36 hours at base or 24 hours away from base, with compensation made up by the end of the 3rd week, added to a rest of at least 8 hours.

Multi-manning

9 hours rest in 30 hours permitted, with further allowance for a driver to operate the 1st hour solo.

Previously 8 hours rest in 30 hours for each driver, with the need for all crew members to be present with the vehicle at all times within that period.

Ferry/train crossings

A regular daily rest period of 11 hours may be interrupted not more than twice, of which the interruptions may be no more than 1 hour – no compensation required.

Previously one interruption of no more than 1 hour permitted, that must have been compensated by 2 hours added to the total rest period.

Split Daily Rest

No longer beneficial, due to minimum 9 hours rest requirement and end of previous compensation requirements.

A 12 hour daily rest period can be taken in two periods. The first period must be at least 3 hours, and the second at least 9 hours.

Previously had to be made up of 2 or 3 periods totalling 12 hours. Each period needed to be no less than 1 hour, with the last period needing to be 8 hours.

New measures to tackle rogue hauliers

In July, Roads Minister, Dr Stephen Ladyman, announced a range of new measures for consultation to tackle hauliers who flout road safety rules.

Enabling powers, which pave the way for the new measures, were granted in the **Road Safety Act 2006**.

The measures aim to ensure that drivers from hauliers based outside Britain cannot escape punishment. The proposals are to give police and inspectors from the Vehicle Operator and Services Agency (VOSA) the power to collect on-the-spot penalties from anyone without a valid British address.

The penalties would be taken as "deposits", equivalent to the value of the fine likely to be imposed. Offenders will then be given the chance to contest the charge in court.

Currently the police and VOSA have powers to prohibit drivers who break the rules by ordering their vehicle to remain stationary for a fixed period.

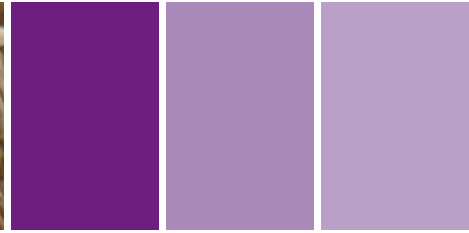
Under the new rules, the police and VOSA will be able to immobilise any vehicle – whether based in Britain or overseas – if there is a risk that the driver will continue the journey before the prohibition has expired, or if the driver refuses to pay the deposit.

VOSA inspectors will also get the power to issue fixed penalty notices.

The measures will focus on road safety transgressions, eg breaching driving time limits, weight or vehicle safety regulations.

As well as acting as a deterrent, the new powers also seek to reduce the burden on the courts – currently the only route to penalising overseas offenders.





NEW tipping guide published

To reflect industry developments, the TASC loading, transportation and safe tipping guide has been updated in conjunction with the Road Haulage Association's Agricultural Foods and Tipping Group.

The four page guide, designed to be used in conjunction with the operators' own specific risk assessments, covers key safety issues including:

- 1) Ensuring the vehicle being loaded is suitable for the products to be carried.
- 2) Always reporting to the responsible person on site and obeying site safety and traffic rules.
- 3) Following all instructions and positioning vehicle safely at loading point.
- 4) If possible, supervising loading process and always being aware of site Health & Safety requirements.
- 5) Never standing on the body while vehicle is being loaded.
- 6) Ensuring that load is distributed evenly from side to side and from front to rear. This should prevent unsafe or illegal loading.

When loaded, ensure that any levelling and sheeting requirements are carried out safely, using the site designated area, if appropriate. If there are any concerns regarding the load, either gross or individual axle weights, or load security, then report to site staff for guidance.

All details should be reported to the haulier's transport office.

In addition, the guide covers information such as pre-delivery checks and approximate weights, measures and angles for all materials.

To obtain a copy of the document, visit the dedicated TASC page on AIC's website www.agindustries.org.uk or email garry.rudd@agindustries.org.uk

HEALTH & SAFETY HSE targets getting on and off vehicles

The Health and Safety Executive (HSE) will launch a campaign this autumn to raise awareness amongst hauliers of the need for improvements to safety features on trailers and heavy goods vehicles, to prevent falls from vehicles.

Latest statistics show that some 2000 workers are seriously injured each year as a result of falling from a vehicle. On average, five workers die annually.

Some 90% of the falls are from below head height and the incidents are estimated to cost some £36.7 million.

Many of these injuries and losses can be avoided, often through fitting simple, cost-effective solutions to new and existing equipment. There is also a need for operators to ensure staff are made aware of the issues.

Further information about the campaign can be accessed at www.hse.gov.uk/fallsfromvehicles/index.htm



TASCsure delivering savings

A TASC-certified owner-driver haulier found that paying attention to the requirements of the scheme paid off when it came to renewing his insurance.

The participant sought to become TASC-certified to ensure he could continue working with some of his agricultural customers. At first the scheme seemed a bit daunting, but the new folders enabled him to work through the scheme requirements and file all the necessary documentation in one place.

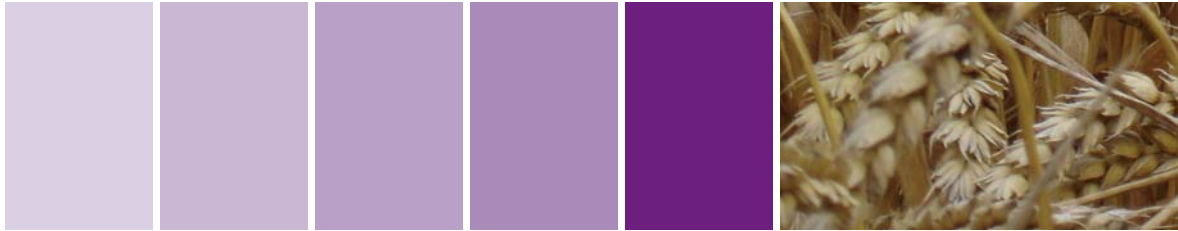
Equipped with this information, he underwent an audit lasting half a day. There were some non-conformances that were clearly explained and readily remedied.

Certification soon followed, opening the door to new business opportunities.



However, there was a bonus for his efforts. He applied to Hammon Osborne for an insurance quotation and was pleasantly surprised to find that the TASCsure scheme would deliver the insurance cover he needed for £200 less than he had paid the previous year.

For details of TASCsure, contact David Dare, Hammon Osborne on 01604 258900 or email d.dare@hammon-osborne.co.uk



Due diligence for levels of Mycotoxins in cereals

Since July 2006, legal limits have been in place for certain mycotoxins in cereals destined for the food industry, particularly the mycotoxin Deoxynivalenol (DON).

The Food Safety Act (FSA) stipulates that whilst grain with DON levels over the legal limit of 1,250ppb (parts per billion) should not be placed on the market, the FSA does allow the 'defence of due diligence'. This means that all companies need to have taken reasonable precautions and exercised due diligence to avoid committing an offence.

As part of these precautions, sampling and rapid testing of milling wheat has been carried out this year. This has identified that on average 3 to 5% of cereal samples currently exceed the legal limit. Following these results, a number of flour millers have requested that rapid testing be carried out for each 100 tonne lot.

This action is neither risk-based, nor does it take into consideration 'the defence of due diligence' carried out by each company. The practical implications of extra rapid testing are likely to include increased delays at flour mills and a potential increase in contractual disputes, given that some mills will reject grain at levels below the legal limit due to the limitations of their testing equipment.

Update on non conformances – the top five

Merchant

Requirements
Feed Hygiene Regs
HACCP
Food Hygiene
Testing/sampling plan for hazardous contaminants
Supplier Assured Status

Testing

Requirements
IQC
Ring Test
Training
HGCA CD Rom
Result Review
Internal Audits

Storage

Requirements
HACCP
Temperature/ grain monitoring
Feed Hygiene Regs
Recall
Training
Pest Control

Haulage

Requirements
Feed Hygiene Regs
Vehicle Sanitising
Vehicle Exterior Clean
Vehicle Inventory/ History
Training

STOP PRESS

The AIC Code of Practice for Deep Cleaning of Road Haulage Vehicles can now be found on the AIC website on the TASCC home page. This protocol specifies the requirements for the cleaning of TASCC trailers that have carried certain Sensitive/Exclusion List material in order for them to be re-admitted to TASCC work.

Planning for a new scheme year

Work is already underway on the 2008/09 TASCC scheme year. Feedback has helped us both update and clarify the scheme documents as well as to improve its presentation.

However, if there are still issues you believe should be amended, improved, or even removed, then now is the time to tell us. Only with practical input from those who operate the scheme day-to-day can we continue to improve and ensure our scheme is fit for purpose.

If you have any comments please send them to garry.rudd@agindustries.org.uk

More broadly, AIC is continually looking to involve members in relevant sectors of the trade association. If you have any questions or feedback on any of the issues or projects which AIC's sectors are carrying out, please contact garry.rudd@agindustries.org.uk or fill in the relevant feed back form available from the website.

Results from the feedback forms can be found on the AIC website on the TASCC home page.



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