

THE NEWSLETTER OF THE UNIVERSAL FEED ASSURANCE SCHEME

Recognising Safe Feed

– New AIC Feed & Food Assurance Report

AIC Services has produced an in depth report on the status of feed assurance in the UK which concludes that 'UK animal feed is produced in a safe and transparent supply chain'



It is a bold statement, but this report is based on a range of historical and current feed assurance data to support the claim.

However, the report warns that this level of

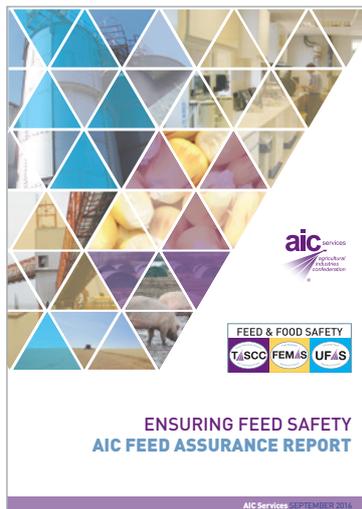
control is only achieved by the continued robust management of the feed assurance supply chain. Insufficient control in any area could lead to a rise in feed and food incidents with adverse impacts throughout the supply chain.

From the early 90's to the early 2000s, when BSE and FMD were major concerns, feed assurance has come a long way. Now, safe feed and food is based upon the feed industry adopting a range of assurance schemes and a monitoring programme for undesirable substances as well as good industry practice.

John Kelley, Managing Director of AIC Services added: "Feed companies are audited annually by an independent certification company. If companies do not conform, they have to correct non-conformances or could end up being suspended from the schemes."

Because feed assurance schemes are adopted by a very high percentage of the industry, they are effectively a ticket to trade. The schemes have been acknowledged as an excellent example of 'best practice' and have gained 'earned recognition' from both the Food Standards Agency and Food Standards Scotland. This recognition has led to significant savings by industry (estimated to be in the region of £2 million per annum) as well as government.

EU recognition is also very important. The schemes have mutual recognition with other leading EU assurance schemes and work with the European Commission and EU Trade



Bodies on feed safety issues.

Looking forward, the schemes need to lead and react to change in the industry, Government and feed safety issues as well as the adoption of new technology. Whist past achievements are acknowledged, future challenges are also recognised as essential to ensure the UK continues to produce safe feed.

New UFAS Standard – six months on

It is now over six months since auditing began against the latest version of the UFAS Standard. This scheme revision was the most radical for a decade. It aimed to update and streamline requirements to benefit participants, scheme assessors and the certification body. The outcome was a single document of 40 pages, instead of the previous version which exceeded 100 pages.

To improve the assessment process further,

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a new checklist format was developed. This was designed to be submitted by email to the certification body thus potentially speeding up the review/certification process. A comparison of non-conformances raised in the first three months of the new standard against the last three months of the previous version are included in this edition of UFAS update.



Earned recognition update

Earned Recognition (ER) of UFAS is now in its third year with the Food Standards Agency (FSA) and Veterinary Medicines Directorate (VMD) and the scope of recognition is still expanding. In 2016 Food Standards Scotland (FSS) has been added to the Memorandum of Understanding, and ER is also being rolled through FSA in Wales and Northern Ireland. Therefore, scheme participants in all four countries can now reap the benefits. AIC and Kiwa PAI are also working with the VMD to extend recognition to UFAS merchants who are approved as Category 8 distributors for medicated feeds.

The basis of ER is a detailed evaluation of AIC's feed schemes (UFAS, FEMAS and TASCC) by the FSA and VMD, comparing the requirements to legislation and reviewing the robustness and independence of the audit process. As a result of the positive conclusion, and ongoing provision of data by AIC on the scheme's operation, UFAS participants can qualify for up to a doubling

of the interval between official visits by Trading Standards Officers. Details of how the frequency for visits is calculated, including the reductions associated with ER can be found in the 'Feed Law Enforcement Practice Guidance' on the FSA website. The precise details of benefits through FSS and FSA in Northern Ireland differ slightly, but the principles remain intact and AIC will continue to work with the authorities to achieve a fully harmonised approach.

As a direct result of the ER agreement, AIC was recently invited to speak to the National Trading Standards (NTS, previously LACORS) National Agriculture Panel which includes the leading Trading Standards Officers for feed from all regions of England, plus representatives from Scotland, Wales and Northern Ireland as well as the VMD. As well as presenting how the schemes operate, AIC was invited to join discussions on the measurement of carryover and recording of cash sales, the positive outcomes of which are covered elsewhere in this edition of UFAS Update.

Food Standards Agency National Food Crime Unit

The National Food Crime Unit (NFCU) was formed by the government in response to Professor Chris Elliott's report into the 'horsegate' issue in 2013. Run by the Food Standards Agency its mandate is to work with partners to protect consumers from serious criminal activity that impacts on the safety or authenticity of food and drink. The unit produces an annual update and part of this is informed by stakeholder input.

As part of this process AIC regularly meets with NFCU analysts to give an overview of the feed

supply chain, and highlight potential areas of concern based on current economic conditions, commodity prices and availability. The NFCU is also interested in more specific information about potential crimes being committed in the food/feed chain. To help facilitate this, NFCU asked AIC to send its members a copy of their Information Requirement which can be found on the 'Tell AIC' page of the AIC Trade Assurance website and for any relevant information to be fed back to them. If you have any information you wish to submit this can be done via AIC or directly to NFCU.

Red Tractor Standards Consultation



October 2016 sees the publication of updated Red Tractor Standards drafts for consultation. AIC will be sharing details of the consultation with the relevant committees, and scheme participants are encouraged to provide comments, either via AIC or directly to Red Tractor.

EU Scheme developments:

Revision of FAMI-QS

Emmanuel Geneiatakis, Director General of FAMI-QS (the international speciality feed ingredients scheme) recently updated the UFAS Working Group on his organisation's scheme documents revision. FAMI-QS certifies a large number of feed additive producers outside of the EU, and so represents a key partner in ensuring the safety of feed ingredients used by feed companies in the UK and Ireland. The group was interested to hear how the scheme was approaching certification of feed ingredients not intended for, or permitted within, the EU without undermining the integrity of certification. The key elements to achieving this is an additional module which covers compliance with EU legislation, where the participant is supplying the EU market, and a range of 'Mandatory Process Documents' which outline the key safety elements required based on the production process. More details on the FAMI-QS scheme can be found at www.fami-qs.org

Common Gatekeeper rules

AIC has been working with GMP+ International, OVOCOM FCA and QS on common rules for so-called gatekeeping activities, where under certain circumstances it is permitted for scheme participants to purchase ingredients from non-certified producers. Historically, each scheme has taken its own approach, with AIC covering these activities under the separate FEMAS Intermediate Supplier standard. However, this had led to concerns that the difference could encourage companies to 'shop around' for the 'easiest' gatekeeper route which could potentially undermine feed safety. The first outcome of discussions will be requirements for buying imported grain from non-assured collectors; it will be closely followed by updated rules on gatekeeping of fats and oils. Many fats and oils requirements will also be relevant to fully certified supply chains and will aim to further the FEMAS approach of ensuring the safety and authenticity of oils and refinery by-products.

Urea in animal feed

Marketing and labelling

In recent weeks a number of issues have been raised relating to the marketing of urea as a grain preservative. AIC has clarified the position with the Food Standards Agency (FSA) which has confirmed that urea is not authorised as a preservative, so marketing it for this purpose is illegal.

Urea was approved as a nutritional additive in 2012 under regulation number 839/2012, and must only be included in feed in accordance with the labelling and maximum inclusion requirements laid down in the annex to the regulation. UFAS certified businesses found to be marketing urea other than in accordance with the additive authorisation will receive a Critical Non-Conformance, leading

to immediate suspension of certification and the issue will be reported to the competent authorities.

Importing from third countries

Under the Feed Additives Regulation number 1831/2003 and its predecessors, where an additive such as urea is produced outside of the European Union, the manufacturer must have an appointed representative within an EU country for the product to be sold. Where a UFAS participant purchases urea or other additives directly from a third country supplier, they are advised to ensure that the supplier has appointed a representative.



Game feed and ruminants

Concerns have recently been raised with the Veterinary Medicines Directorate (VMD) and Animal and Plant Health Agency (APHA) over livestock (particularly ruminants) having access to game feed. As a result, officials at the Animal and Plant Health Agency (APHA) are trying to raise awareness of the dangers.

This information, put together by the APHA, is being published in the Agency's surveillance highlights report and it is understood that something similar will shortly be put in the Veterinary Record surveillance report. Government officials have also asked AIC to circulate this information to alert feed compounders and merchants so that you can, in turn, inform farmers of the risks.

Gamebird feed and ruminants

Two incidents in quick succession have highlighted risks to ruminants from gamebird feed. One incident involved medicated partridge feed being fed on moorland being co-grazed by sheep; the second involved medicated pheasant feed to which beef cows and calves had access. Unintended exposure to medicated feed is bad practice and unacceptable for many environmental and animal related reasons. These include:

- **Exposure of ruminants to** gamebird feed which contains **fish protein** and as such is **a breach of the Animal by-Products Regulations**.

- **Clinical disease and death** due to unregulated access to feed medicated with **lasalocid causing ionophore toxicity (see below for symptoms)**.
- **Failure to follow guidance** for the use of medicated feed including those **associated with antimicrobial resistance**.
- Unintended **exposure of ruminants to medications** in feed which were not intended to be fed to ruminants. This requires a prolonged withdrawal period to be set and observed.
- **Clinical disease and death due to** unregulated access to grain based feed. This could potentially cause **grain overload and clostridial disease**.

The clinical signs of ionophore toxicity in ruminants include:

- Sudden death
- Diarrhoea
- Respiratory signs and recumbency

Pathological findings include focal cardiomyopathy, skeletal muscle necrosis and pulmonary oedema.

Please be alert to this problem and actively address the potential food chain issues by preventing ruminants accessing game feed. Please report suspected incidents to APHA at an early stage including information regarding what is in the feed.

Recording of Cash Sales

Since the introduction of the Feed Hygiene Regulation (No. 183/2005) over 10 years ago there has been a concern that a literal interpretation of the wording around record keeping could lead to a disproportionate burden on businesses selling bagged animal feed to cash customers.

During 2015 some guidance was developed by the National Trading Standards Agriculture Panel which could be interpreted that detailed batch records were needed for each cash transaction. Following discussions with the Food Standards Agency this guidance is being clarified to ensure that UFAS participants who maintain traceability records relating to feed sold, and take steps to identify professional users buying feed for cash will be considered to be complying with legislation. Further guidance can be found on the AIC website.



Measurement and evaluation of carryover

During an audit of UK feed law enforcement by the Food and Veterinary Office in 2014 a recommendation was made that UK authorities should take surveillance samples to ensure that carryover limits for certain additives listed in the Undesirable Substance Directive (no. 32/2002 as amended) were being met.

Initial rounds of sampling caused some concern to industry because they indicated significant issues with excess carryover. After further enquiries, it became apparent that some 'non-compliant' samples were taken at points before outloading finished feeds, potentially giving a false picture as to the level of carryover. The picture is further confused by the fact that one feed additive listed in 32/2002 is decoquinat, sold as Deccox which is used widely under prescription in the UK as a veterinary medicine in ruminant feeds.

Following discussions between AIC, FSA and VMD it has now been clarified that the limit for decoquinat given in the Undesirable Substances Directive only applies where the active is used as a specified feed additive (without prescription) in poultry feed. When used in ruminant feed the guidance on percentage carryover in the UK Veterinary Medicines legislation takes precedence. Further it has been clarified that the limits also only apply to finished feed at outloading, and interpretation of results by public analysts and trading standards officers need to take these points into consideration.

To further improve cooperation between AIC and the enforcement authorities it has been agreed that efforts should be made to develop a joint sampling protocol for measurement of carryover to maximise the correlation between a company's own samples and those taken by the authorities.

FEMAS & TASCC reviews

The FEMAS and TASCC Working Groups have both commenced work on the next revision of their respective standards, with the aim of having new versions published by the end of 2017 and implemented in the early part of 2018.

As previously indicated AIC wishes to align as far as possible the contents of all three feed schemes by using common wording. To move

towards this ambition, both FEMAS and TASCC will be making use of the current UFAS wording where appropriate. Both schemes will be out for public consultation during the second half of 2017.



RED – a simple, cost-effective solution

RED, the EU'S Renewable Energy Directive (RED), which came into force in June 2009, sets a binding target of 20% final energy consumption from renewable sources by 2020. To support this obligation AIC has a RED Appendix within TASCC and UFAS which meets the current RED requirement.

The RED Appendix has been accepted by the EU and can be audited alongside TASCC (AIC's Trade Assurance Scheme for Combinable Crops) or UFAS (Universal Feed Assurance Scheme).

It is based on a mass balance system and all records need to be maintained. A participant's certification status in relation to RED will be shown on the AIC Assurance Checker. Please check your customer requirements before applying to the scheme.

Farm assurance schemes, such as Red Tractor and SQC, as well as trade schemes such as TASCC and UFAS have gained approval from the Commission as voluntary schemes under RED. This allows them to be used as the mechanism for auditing sustainability and provides the simplest, most cost-effective solution for farmers and merchants alike.

Further information can be found on the AIC website or contact Garry Rudd.

Committees update:

New members on UFAS Review Group

The UFAS Review Group, which is responsible for developing the UFAS Standard, as well as assisting AIC and Kiwa PAI in the ongoing interpretation of the scheme requirements, is pleased to welcome William Davidson of Davidson Brothers (Shotts) Ltd and Alison Lowham of Thompsons Feeds in Belfast to the meetings. This means that the group now has representation from companies operating in a wide range of feed activities, and covering all countries in the UK.

UFAS Working Group adds stakeholders

The UFAS Working Group recently invited Red Tractor Farm Assurance to join the committee, and were delighted to welcome Jess Sloss to the summer meeting. It is hoped that Red Tractor involvement (which is mirrored in the TASCC Working Group) will lead to stronger ties between schemes linking the various stages of feed and food production. Following the separation of FEMAS and UFAS from the BETA NOPS scheme earlier in 2016, BETA are also represented on the UFAS Working Group by Andrea Stott of Mars Horsecare.

The UFAS Working Group also regularly invites other stakeholders to join the meetings and discuss matters of mutual interest. Recent attendees have included representatives of the Food Standards Agency, the Veterinary Medicines Directorate and the feed additives scheme FAMI-QS.

Feed & Food Assurance Steering Group

AIC formed the Feed & Food Assurance Steering Group in 2015 to help in the strategic aim of aligning UFAS, FEMAS and TASCC, with members drawn from participants of all three schemes, plus the chairs of the scheme working groups. Along with representatives from Kiwa PAI, AIC Services staff and AIC's Feed Sector, the group's remit is to share and encourage best practice between the schemes, as well as 'horizon scanning' for future issues that could impact scheme participants. The committee is also working on closer ties with other AIC committees, particularly the Feed Executive Committee, to ensure a fully joined-up approach to food and feed safety.

Aflatoxin in maize



The start of the 2015 European maize harvest saw discussions, which had gone on since the aflatoxin issues experienced with maize during 2013, come to a conclusion with key scheme owners collaborating and publishing a common risk assessment and monitoring protocol for maize.

Pooling analytical data and experience of where and when aflatoxin issues arise during monthly conference calls allowed a rapid response to emerging issues which protects the feed and food chain from significant contamination issues. With pooled data and trust building year on year, it is hoped to refine the process and risk assessment further. The criteria by which a particular origin is moved up the risk rating – based on results and

RASFF alerts – is well understood, but work is still needed on how, when – or even if – a high risk rating country can be reduced.

Evidence that the collaborative approach and ongoing dialogue is working in the interests of the feed and food chain came recently when a RASFF alert was raised in Spain for high levels of aflatoxin in maize imported from Brazil. This was closely followed a few days later by confirmation from GMP+ that some samples from a shipment of Brazilian maize in the Netherlands had also exceeded legal limits, and as a result all schemes upgraded the risk rating of Brazil to the highest level and communicated the change to their participants thus reducing the risk of recalls.

Zearalenone in soya products

During the summer of 2016 some consignments of soya products from Argentina were found to contain elevated levels of the mycotoxin zearalenone. Currently, within the EU, there are guidance levels specified for compound feeds and cereals intended for animal feed, but no limits relating to soya and its derivatives. The presence of zearalenone in soya was attributed to wet conditions during the growing season in Argentina, and there was concern that the lack of any guidance levels for soya products could mean that feed materials sold complying with legislation could result in illegal levels of zearalenone

in finished feeds.

In the event surveillance data from the NIGTA Food Fortress scheme did show a detectable increase in zearalenone levels in ruminant feeds, but not near the guidance levels. No effect was seen on monogastric feeds.

This issue coincided with AIC amending the four year old UFAS monitoring programme to commence screening for a suite of mycotoxins, whilst reducing the number of dioxin analyses carried out. In future AIC will have ongoing data for mycotoxin levels in compound feeds giving the potential to spot emerging issues in the feed material supply chain.

Comparison of Non-conformances UFAS 2012 to UFAS 2016

Due to the major changes during the revision process, a direct comparison is not possible, in particular because UFAS Merchant and Compound non-conformances are now reported together. Historically UFAS Merchants had a lower number of non-conformances, and this is reflected in the reduced percentage of audits with a particular non-conformance.

Overall the areas of non-conformance that are common with both versions of the scheme are protecting feeds from contamination (clause C 1.1) and HACCP (A 3).

UFAS Merchants Feb – Apr 2016		UFAS Compounds Feb – Apr 2016		UFAS 2016 May – July 2016	
Annual internal audit documented	5%	Weighing, monitoring, weighbridges, etc, calibrated at least annually	12%	Where treatments are used the participant must either use a pest contractor or have a qualified employee	6.75%
Supplier approvals	5%	Labels must be correct and conform to legislation	12%	The Company must have a policy statement	5%
Pesticides approved	2.5%	Sampling and analysis to check efficiency of mixing every 6 months	12%	The layout, design and operation throughout must be such that it does not cause contamination issues	4.6%
HACCP team defined	2.5%	Effective cleaning and maintenance	10.5%	A formal food/feed safety Risk Assessment must be carried out	4.2%
Assured supply chain	2.5%	Contamination of feed	9.5%	The product recall procedure must be tested annually	4.2%
Product liability	2.5%				

AUDIT REPORTS

Did you know that in addition to the Action Point list left at the end of your assessment, UFAS participants can get a copy of the full audit report from Kiwa PAI upon request?

kiwa



Partner for progress



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