

FEMAS update

THE NEWSLETTER OF THE AIC FEED MATERIAL ASSURANCE SCHEME



Welcome to FEMAS Update

Welcome to the first edition of our newsletter for FEMAS participants. We hope that you will find these news items and updates interesting and useful, while also providing insight into other industries that use FEMAS for safe delivery of animal feed ingredients. If you have any suggestions for future newsletter topics, please get in touch using the contact details on the back page.



Simon Williams
Technical Manager
AIC Services

The FEMAS Calculator is changing

The FEMAS Calculator will soon see its most significant changes since launching in 2013. Over the past year, industry representatives have been working with AIC and the FEMAS certification body Kiwa AgriFood to bring the Calculator up to date and enhance its flexibility when covering ingredients that are novel or composed of mixtures.

The first update will see an expansion of functionality, focusing on the contents of the current EU Catalogue of Feed Materials. Key changes include:

- Applying a consistent approach to what tests are required for similar feed materials
- Grouping analyses together into common 'suites' of tests e.g., mycotoxins, heavy metals
- Increasing the minimum number of tests required from one to three to ensure that seasonal/batch variations can be accounted for

Test descriptions have been updated to include more specific information – particularly where the method or analyte is linked to a piece of legislation – guidance has been added where, for example, a maximum contaminant in a feed material is specified in the catalogue.

The second update will add new functionality that covers ingredients on the ever-changing EU Register of Feed Additives and EU Register of Feed Materials, and their GB equivalents, as they develop and inevitably diverge. Rather than provide an overwhelming and constantly changing list of materials in the Calculator, a decision tree will allow the participant to answer a series of questions that will provide a set of required analyses.

One thing that will remain is the ability to apply for a derogation from Kiwa if the participant feels they have evidence that the level/type of testing indicated by the Calculator is unnecessary. It is also important to note that the Calculator still represents what is considered a minimum level of analysis. Participants still need to carry out their own risk assessment and analysis beyond that.

Meet Tim Oliver, FEMAS Working Group Chair

I am an independent consultant, FEMAS auditor and UKAS Technical Assessor and honoured to be elected Chairman of the FEMAS Working Group in October 2019. Since then, I have been lucky enough to meet a large cross-section of representatives (in person and virtually) from FEMAS-certified businesses.

Prior to becoming self-employed in 2017, I had a varied career in the feed industry including commercial, trading, production, and training roles. In the latter years of my employment, I also worked on sustainability and ethical trading, including assessing compliance in countries around the world.

For the past year or so, I have been working with Kiwa Training to deliver the FEMAS participant training. It has been very rewarding to discover that FEMAS is widely valued, but none of us in the FEMAS team take your satisfaction for granted. We will do everything in our power to keep FEMAS a crucial and relevant tool for maintaining high levels of feed safety in the UK.

I would like to take this opportunity to thank AIC for the continuing support and expertise it brings to the FEMAS programme, along with Kiwa Agri Food and their team of auditors for the dedication they bring. Perhaps most importantly, I would also like to thank the participants in the FEMAS Scheme. At the end of the day, it is the implementation of FEMAS by hundreds of businesses in many sectors across the UK and internationally that is mitigating hazards that would otherwise jeopardise the feed industry.



Earned Recognition

Renewal of Memorandum of Understanding (MoU)

UK feed and food authorities grant Earned Recognition to participants of schemes that have demonstrated robust systems to ensure legal compliance. The current Earned Recognition MoU has been in place since 2016. With the changes planned for the Feed Law Code of Practice and the implementation of the new competency framework, it has been agreed that now is a good time to update the MoU. The basic principles of the agreement will remain the same, but the review will look at the type and frequency of data supplied by the schemes to the authorities, whilst also strengthening the requirements for data sent by the authorities to AIC.

Everyone involved in Earned Recognition over the past few years has agreed that it has been a great success. We are now seizing the opportunity to strengthen and streamline the process further.

Food Standards Scotland

Food Standards Scotland (FSS) became a signatory to the Earned Recognition MoU in 2016. For a long time, FSS has intended to introduce a centralised approach to feed law enforcement to improve consistency across

different regions. This is now enshrined in Scottish Law. Since 1st April 2021, FSS are the sole competent authority for feed hygiene in Scotland. This means there is now a single point of contact for all Scottish feed businesses, via feed@fss.scot and online registration and approval application forms. In some areas of Scotland, inspections will still be carried out by the local authority (or a neighbouring one) whilst others will have directly-employed FSS inspectors. Regardless of who delivers the inspection, the planning and reporting will all be managed centrally by FSS.

Earned Recognition and EU Exit

All feed authorities within the UK are fully committed to the concept and implementation of Earned Recognition. However, the content of the Trade and Cooperation Agreement means that the feed industry in Northern Ireland will continue to follow EU legislation whilst Great Britain (England, Scotland, and Wales) is likely to gradually diverge from this. As a result, it has been agreed with UK authorities that AIC schemes will be benchmarked against GB and EU legislation to ensure that compliance across the UK can be demonstrated.



Training

AIC/ CIEH Level 2 HACCP Course

AIC has worked with the Chartered Institute of Environmental Health (CIEH) to produce an online level 2 HACCP course tailored to the agrifood/feed supply chain. The course costs £35 per attendee and includes a multiple-choice exam. Following completion, a CIEH certificate is issued. The course may be a suitable introduction to HACCP for production staff responsible for feed/food safety or for HACCP team members. For further details, contact Roberta Reeve via roberta.reeve@agindustries.org.uk



Kiwa FEMAS Participant Training

Kiwa Training launched a new FEMAS participant course in 2019. Initially, these were one-day courses held at various locations around the UK. For obvious reasons, these switched to an online format spread over two half days during 2020. Attendee numbers were still limited, and the focus remained on trainer interaction to ensure that all participants get the most out of the course. For further information on upcoming courses, or to arrange an in-house course for your business, contact Arlana Spark at uk.training@kiwa.com



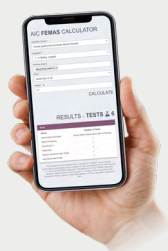
AIC Portal

For FEMAS participants, the AIC portal (hosted by Kiwa) has been part of compliance with the scheme since the Calculator launched in 2013. The range of functions performed by the portal has expanded over time and now serves a number of key functions for all companies. The portal can be accessed at aicportal.kiwa.co.uk and if you are not already signed up contact the Kiwa Feed Schemes team at feed@kiwa.com



FEMAS Calculator

To get the best use out of the Calculator functionality, participants should ensure they are logged in to the portal. This will allow them to save product calculations and revisit them regularly, particularly when Phase 2 of the updated Calculator is launched.



Vehicle Inventory

Added as a new requirement in 2019, FEMAS participants operating bulk vehicles are now required to register these in the online vehicle inventory. This tool is also used by TASCC and UFAS participants. Over time we will build up a large database of vehicles used to transport feed, which will be a huge advantage to our industries in case of a future food or feed safety incident.



Audit Preparation

With the enforced move to remote auditing in 2020, the ability to upload documents prior to audit was key in ensuring the audit process went smoothly. In view of the resulting benefits seen by both participants and auditors, this approach is likely to remain in place even as we move back to on-site audits.



Audit Follow-up

The ability to upload evidence of corrective actions post-audit has been available on the portal for a number of years. The past 12 months has seen this become fully integrated into Kiwa's systems and it is now the preferred way to submit evidence. The advantage to participants is the security of the process compared to email attachments and the simple drag and drop functionality. In addition, participants can see the progress of their non-conformances post-audit and the review process is streamlined for Kiwa.



Common Non-conformances

Hannah Adams, Feed Ingredient Scheme Manager at Kiwa Agri Food, has been looking at common non-conformances raised during audits and offers some insights into how they may be avoided.

Clause No.	Requirement	Why is it there?	Ensuring compliance
F 3.6	All supplied feed must show confirmation of the FEMAS scheme ID number for the participant company responsible for the labelling, either on the label or on delivery documents.	To ensure recipients of feed covered under the FEMAS scheme can be sure of the assurance status.	The easiest way to find your FEMAS number is to go to the AIC Assurance Checker at www.agindustries.org.uk/sectors/trade-assurance-schemes.html and input your company name into the checker. Your number will be detailed next to the scheme ID heading. Your number is also included on your FEMAS certificate.
I 5.2	The analysis schedule must, as a minimum, meet the defined analysis requirement from the FEMAS Calculator, unless a derogation from this level of testing has been agreed with the Certification Body.	The Calculator was introduced in 2013 as a minimum testing requirement to assist businesses in identifying the hazards within the feed they produce or trade and suggest a minimum regime of testing.	<ul style="list-style-type: none"> Review the calculator at least every twelve months and ensure there is evidence of this. Ensure that all feed produced and traded is included in your review. Develop a testing schedule in line with the requirements of the calculator and your own independent risk assessment of your process and product. Adhere to and complete all scheduled testing.
J 2.2	A feed safety incident management and recall procedure must be in place that is capable of being put into operation at any time.	It is key that there is a documented process in place which can be enacted in the case of recall. This is a requirement of the Feed Hygiene Regulation 183 2005.	Ensure that you have a documented procedure which includes contact details for the competent authorities (this may be the FSA, Defra, and your local Trading Standards office or your national and local equivalents) and the certification body.
B 1.5	The participant must define the process flow/ steps from raw material supply to the point the feed is transferred to the customer/recipient.	The process flow chart is the starting point of any risk assessment and HACCP plan. If processes are skipped, the hazards at those process steps may be missed and therefore not controlled.	The key areas where participants fall foul are when a process changes or is added and the flow chart and risk assessment are not updated accordingly. It is helpful to periodically walk the line/process with the HACCP team to ensure all stages have been captured.
G 2.5	Personnel competence must be evaluated after training and reviewed at least every 12 months, or earlier if changes to the business or operations relevant to feed safety occur.	The FEMAS Standard has an emphasis on competence rather than training alone. Training must be effective and evaluated to ensure that staff have understood their roles relating to feed safety. Assessing competence ensures that staff have the necessary knowledge and skills or highlights any gaps.	Businesses approach competence in different ways but it is not sufficient to simply have training records in place for staff. Participants need to have systems to ensure personnel fully understand and have the necessary ability to perform the activities they have been asked to complete. This can be demonstrated through testing staff, appraisals, on the job mentoring, and receiving feedback from employees. A review must be completed at least every 12 months.

Hannah Adams
Feed Ingredient Scheme Manager
Kiwa Agri Food

