

FOR INFORMATION

UPDATE ON ACAF REVIEWS OF ON-FARM FEEDING PRACTICES AND OF FEED LAW ENFORCEMENT, AND RELATED ISSUES

Executive Summary

1. The paper reports on two reviews conducted by the Advisory Committee on Animal Feedingstuffs (ACAF) and summarises the recommendations made and follow-up action taken. It also reports on associated work undertaken by the Agency's Animal Feed Unit and devolved administrations.

2. The Board is asked to:
 - **note** action taken and planned in response to ACAF's Report on On-farm Feeding Practices;

 - **note** action taken and planned in response to ACAF's Report on Feed Law Enforcement;

 - **note** action taken in response to European Commission's Food and Veterinary Office's recommendations for UK enforcement of animal feed controls; and

 - **note** monitoring, reporting and follow-up action taken by the Agency's Animal Feed Unit and devolved administrations.

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UPDATE ON ACAF REVIEWS OF ON-FARM FEEDING PRACTICES AND OF FEED LAW ENFORCEMENT, AND RELATED ISSUES

Issue

1. To inform the Board of the outcome of recent ACAF reviews on:

- (a) On-farm Feeding Practices¹;
- (b) Feed Law Enforcement²;

and associated follow-up action.

Strategic Aims

2. Animal feed controls contribute to food safety and consumer confidence. Steps to strengthen animal feed checks are one part of the Agency's aim to ensure proportionate and more consistent enforcement.

Background

3. The BSE Inquiry report³ in October 2000 concluded that the chain of animal feed manufacture, distribution, on-farm mixing and on-farm use was complex, and the ease with which cross-contamination occurred within it was one of the most concerning issues in the BSE outbreak. Following discussions at its Open Forum held in July 2001, ACAF agreed that a review of on-farm animal feeding practices should be included in its forward work plan.

4. Livestock farmers have several choices regarding the types of feed they use and the form in which they are fed. Feeds may be either bought in or produced on the farm where they are used (on-farm produced). Purchased feeds may be obtained

¹ www.food.gov.uk/multimedia/pdfs/farm.pdf

² Printed copies of ACAF's Report on Feed Law Enforcement will be available towards the end of May 2005

³ BSE Inquiry report published in October 2000 available from www.bseinquiry.gov.uk

directly from other farms, from compound feed mills, feed merchants, supplement suppliers or food processing factories.

5. On-farm produced feeds are primary agricultural products such as forages, cereals and pulses. Forages may be fed fresh (e.g. grass) or preserved (e.g. silage or hay). Cereals such as wheat and barley, and pulses such as peas and beans, are most commonly harvested at the point of maturity when the seed heads (grains) are at their fullest. These grains may be used on farm or sold for feed or food use. Generally some form of processing is required to breakdown the seed coat (husk) and improve digestibility. The most common processing prior to feeding involves physical treatment of the grains, e.g. rolling and grinding.

ACAF Review of On-farm Feeding Practices

6. ACAF's Report on On-farm Feeding Practices was published in September 2003 and the Committee advocated the adoption by farmers of arrangements based on recognised risk management approaches, and encouraged them to adopt principles of Good Agricultural Practice, Good Manufacturing Practice, and Hazard Analysis and Critical Control Points (HACCP).
7. Board Paper 03/11/02 (On-farm Feeding and Other Aspects of Animal Feeds)⁴ reported and sought views on ACAF's review on On-farm Feeding Practices. It also referred to an inspection mission to the UK by the European Commission's Food and Veterinary Office (FVO) and the commencement of ACAF's review of feed law enforcement. In its discussion in November 2003, the Board noted the need for consistency in feeding practices across all farms, acknowledged the importance of communicating ACAF's recommendations (Annex I) to farmers and noted the complex situation with respect to feed law enforcement.
8. Much time and effort has been expended by the Agency's Animal Feed Unit in exploring ways in which the views of ACAF on on-farm feeding and feeding practices can be disseminated more widely and its recommendations adopted. Action taken in this regard is listed in Annex II.
9. Additionally, there are wide-ranging controls on the composition and marketing of animal feeds, almost all derived from EC legislation. Safety controls include a list of authorised feed additives (e.g. vitamins and trace elements) and maximum

⁴ www.food.gov.uk/multimedia/pdfs/fsa031102.pdf

permitted levels of contaminants. These controls have been strengthened in recent years.

Food and Veterinary Office (FVO) Mission to the UK

10. During an inspection mission to the UK in 2003, covering all stages from production to the use of feeds for farmed animals, the FVO identified a number of areas where improvement in enforcement of animal feed controls was required. These focused primarily on the division of responsibilities of competent authorities for animal feed controls. Agency officials discussed the recommendations of the FVO mission with colleagues from Defra and other agricultural departments, the Veterinary Medicines Directorate (VMD) and enforcement bodies to see how they might be implemented. Annex III lists the FVO's recommendations and summarises the action which has been taken in response to them.

ACAF Review of Feed Law Enforcement

11. The Committee embarked on a review of feed law enforcement at the end of 2003. It looked at the whole system of enforcing feed law and standards, including not only official inspections but also audit arrangements for relevant assurance schemes. It considered the scope for improvements including rationalisation. Printed copies of the Committee's report will be available towards the end of May. The Committee's conclusions and recommendations are set out in Annex IV. Prior to publication, key stakeholders (e.g. the Agricultural Industries Confederation, NFU and LACORS) were invited to comment on a draft version of the Committee's report. They were supportive of the broad thrust of the Committee's conclusions and recommendations. A formal consultation of all interested stakeholders will commence shortly.

12. The Committee did not have any immediate concerns about feed safety but thought that there was scope for a more risk-based approach to enforcement, which would also result in better use of resources.

13. The Agency will discuss the outcome of the Committee's review with representatives of the enforcement authorities. The aim will be to draw up an action plan to take forward ACAF's recommendations.

Relevant work undertaken by Agency's Animal Feed Unit and devolved administrations

14. The Agency's Animal Feed Unit and devolved administrations, in co-operation with enforcement authorities, carries out a great deal of work in order to fulfil UK official inspection requirements enshrined in EC law. Key aspects of this work are set out in Annex V.

Impact

Impact on business

15. The recommendations in the ACAF Report on On-farm Feeding Practices are directed at farmers who mix their own animal feed. Most of them take the form of advice regarding good agricultural practice. However, farmers are recommended to seek outside help if necessary in assessing hazards and risks on their farm. They are also urged to undertake appropriate targetted feed analyses to demonstrate that practical control measures are working and that feeds are safe.

16. Typical farm consultant rates range from about £250-450 per day. The time required to do a farm assessment varies depending on the size of the farm, number and type of stock involved and complexity of the mixing process. For a typical dairy farm (100 cows) mixing feed for cows and young stock, or large pig and poultry farms mixing all their own feeds, visits of 4 hours or so might be necessary, while a typical sheep farm or suckler cow farm would probably only require 2-3 hours. Additionally, the consultant would probably spend a few hours preparing a report.

17. The cost of analyses is more difficult to quantify. If a farmer is just wanting to ensure that he is achieving a consistent mix, then a simple analysis for a couple of constituents, e.g. oil and crude protein, would normally be sufficient. One analysis per mix should normally suffice, at a cost of £15-20 per sample. Most typical home mixers would do anything between 50 and 200 mixes per year, again depending on the complexity of the farming and feeding systems, and storage capacity for the mixed feeds. A suckler cow/beef hill farmer may only do one mix a week, and that only through the winter months, while a pig producer with 200 sows may mix feed once or twice every day. Analyses for more exotic constituents (trace elements, mycotoxins, etc) are much more expensive (up to £100/sample) but would only normally be done when there is a problem.

Impact on enforcement

18. The recommendations in the ACAF Report on On-farm Feeding Practice if taken up by farmers will reduce the need for them to take future corrective action and for enforcement officers to make frequent inspection visits and issue instructions on good practice. The recommendations in the ACAF Report on Feed Law Enforcement will impact primarily on enforcement bodies. For example, the Committee recommended that all enforcement authorities should extend or introduce risk-based enforcement schemes to take into account all likely hazards related to feeds. The Committee supported the Agency's intention to introduce a code of practice on feed law enforcement, similar to codes that currently exist for food law enforcement. Local authorities will need to have regard to such codes, which are aimed at ensuring consistent enforcement standards.

Impact on consumer confidence

19. The recommendations in the two ACAF reports focus on good practice on farm and on the need for a more consistent and risk-based approach to feed law enforcement. The aim is to raise consumer confidence in the animal feed chain and ultimately the human food chain.

Impact on the Agency

20. The only real impact on the Agency of the ACAF Report on On-farm Feeding Practices has been in providing staff resources in order to disseminate the ACAF views and in seeking their adoption by industry (see paragraph 8). Some of the recommendations in the ACAF Report on Feed Law Enforcement and elements in the Feed Hygiene Regulation will impact on the Agency. The Agency is drawing up a code of practice for feed law enforcement. As appropriate, it will provide guidance to feed and farming industries on compliance with the Feed Hygiene Regulation. The Regulation requires the compilation of a database of feed premises and the Agency will lead on the co-ordination of this with enforcement authorities.

Conclusion

21. The approaches taken and proposed seek to ensure flexibility and proportionality in respect of on-farm feeding practices and feed law enforcement that is compatible with ensuring consumer protection and effective food safety.

Board Action Required

22. The Board is asked to:

- **note** action taken and planned in response to ACAF's Report on On-farm Feeding Practices;
- **note** action taken and planned in response to ACAF's Report on Feed Law Enforcement;
- **note** action taken in response to European Commission's Food and Veterinary Office's recommendations for UK enforcement of animal feed controls; and
- **note** monitoring, reporting and follow-up action taken by the Agency's Animal Feed Unit and devolved administrations.

ACAF REVIEW OF ON-FARM FEEDING PRACTICES

RECOMMENDATIONS (in bold text)

1. **The Committee recommends that all home mixers and livestock farmers adopt arrangements based on recognised risk management approaches.**

The Committee was concerned that farmers should apply good agricultural and manufacturing practice and adopt a systematic approach to identifying, evaluating and controlling hazards within their feed production and feeding systems. This could be via the principles of Good Agricultural Practice (GAP) or Good Manufacturing Practice (GMP). Alternatively, farmers might choose to initiate a HACCP plan.

2. **The Committee recommends that all home mixers should have a risk assessment and control programme in place. The system chosen must be proportionate to the potential risks to animals and human health which will be related to the types of feeds being fed, the number of livestock involved, the market outlets for those products and whether the farmer is also selling feed manufactured on farm.**

The Committee had no wish to prescribe how individual farmers should tackle this exercise. It recognised that an individual farmer's approach to identifying and addressing hazards should be proportionate to risks, e.g. a farmer with few livestock and no sales of feed he produces, would be expected to take less action than larger operations.

3. **The Committee recommends that farmers seek outside help if necessary, whether from the feed industry, feed material suppliers, private consultants, assurance scheme auditors or other advisers in assessing hazards and risks on their farm.**

The Committee thought that some farmers may consider themselves too close to the practical operation to be sufficiently analytical or objective. Recommendation 3 was made with this in mind. The Committee encouraged use of a checklist approach on the lines of Annex III to its report, and recognised that hazard analysis would involve varying factors because all farms are different.

4. **The Committee recommends that farmers undertake appropriate targeted feed analyses to demonstrate that practical control measures are working and that feeds are safe.**

In considering the level of risk associated with each hazard, it would be ideal to have data on farmers' own materials or those bought in. The Committee recognised that not all farmers would be able to afford targeted feed analyses.

5. **The Committee urges that codes of practice and assurance schemes should be further developed where necessary to address the particular hazards associated with on-farm mixing and feeding. It also encourages farmers in the use of/participation in such codes and schemes.**

The report referred to assurance schemes for livestock production and to codes of practice, including the NFU's Code of Practice for On Farm Mixers. The Committee did not seek to assess the schemes and codes but urged that these be further developed to include identifying and addressing hazards.

6. **The Committee recommends that farmers should take particular care when purchasing either new types of feed or feed material, or from new suppliers, especially when the material in question is abnormally cheap.**

The Committee noted that the major feed, and food-linked, incidents in recent years have related to raw materials used in feed production. It believed that production, sourcing, transport and receipt of these materials had to be particularly well controlled. Although the onus for demonstrating quality should be on the suppliers, farmers were advised in the report to exercise particular caution when purchasing cheap or unusual feedingstuffs. This is an important area of risk which farmers must address, in much the same way as the feed manufacturing industry has via its Feed Assurance and Feed Material Assurance Schemes (UFAS and FEMAS).

7. **The Committee recommends that all materials, purchased by farmers for animal feeding, should come from sources and suppliers who can demonstrate compliance with recognised quality assurance standards.**

This Recommendation also underlines the importance of using assured raw materials. In particular there is a Feed Materials Assurance Scheme operated by the UK feed industry. Farmers purchasing from suppliers accredited under this Scheme would have a measure of confidence in their feed materials.

8. **The Committee notes that the EC Commission's proposals on feed hygiene will introduce the registration of all feed businesses, including producers of feed materials, who would be required to apply Hazard Analysis and Critical Control Point principles. The Committee supports this development.**

The Agency has supported this approach whilst seeking to clarify the Commission's intentions where HACCP is concerned. However, it is considered arguable whether registering all feed businesses including farms would lead to any significant safeguards to the feed and food chains.

9. **The Committee encourages farmers selling manufactured feed to be independently assessed for compliance with an appropriate assurance scheme.**

The Committee considered that farmers who produce and sell feed should be required to demonstrate 'due diligence' to their customers. In this connection such farmers should consider employing the same quality assurance measures as commercial feed manufacturers.

10. **The Committee recommends that farmers responsible for organising their own road haulage comply with the industry-wide code of practice for road haulage, which will provide them with a level of independent assurance.**

Similarly to the previous recommendation, farmers were directed in the report to a code of practice for the road haulage of feed.

11. **The Committee recommends that farmers keep clear records enabling traceability of all purchased feed materials, additives or compound feeds used and fed on farm.**

The numerous feed-related scares in Europe over recent years, as well as Food and Mouth Disease, have highlighted the importance of traceability within the food supply chain. Without the ability to identify rapidly where animals, feed or food products have come from and gone to, it is impossible for anyone to respond quickly and effectively when problems are found within the system. EC legislation makes traceability an obligation for all operators in the feed/food supply chain. Traceability will not be achieved without adequate and clear documentation. As far as livestock farmers are concerned, the report set out a number of minimum requirements. The Agency has fully supported the importance of traceability where feed and its ingredients are concerned.

12. **The Committee recommends that everyone involved in on-farm feeding should be able to demonstrate their competence, having appropriate skills to match the scale, risks and complexity of the feed operation.**

Council Directive 95/69/EC on the approval and registration of feed establishments indicated that feed manufacturers must have sufficient staff and possess the necessary skills and qualifications. The report puts this into context for farmers mixing their own feed.

ACTION TAKEN IN RESPONSE TO ACAF REPORT ON ON-FARM FEEDING PRACTICES

- The Agency's Animal Feed Unit has assisted the NFU in revising its Code of Practice for On-farm Mixers (producing complete feeds for their own use), which contains a reference to the ACAF Report and mirrors a lot of the important advice contained in it. NFU regional offices have also helped to distribute copies of the Report to farmers;
- The National Association of Agricultural Contractors (NAAC) has recently drawn up an assurance scheme for mobile feed processors which reflects ACAF's recommendations in respect of training, maintenance of equipment, proper use of ingredients, processing, sampling and removal of waste;
- A State Veterinary Service Field Information Note has been sent to all Animal Health Divisional Offices throughout Great Britain asking them to alert their staff to the existence of ACAF's Report and raising awareness of the need to check critical control points, e.g. storage conditions, when visiting farms. The Department of Agriculture and Rural Development has done something similar in Northern Ireland. An electronic copy of the Report, together with an explanatory note has been placed on the Agency's website.
- Animal Feed Unit has included a section on ACAF's review in a series of training sessions on on-farm feed controls it has been rolling out to local authority Trading Standards Officers (TSOs) throughout Great Britain. These seminars were designed to raise awareness and to prepare for the introduction of provisions in the recently adopted EC Regulation on Feed Hygiene (183/2005). Ten seminars held throughout Great Britain have been attended by 230 enforcement officers. In addition, a video entitled "Feed for Thought" showing examples of good and bad on-farm feeding practices has been produced by the Agricultural Development Advisory Service (ADAS) on behalf of the Agency and circulated to all local authorities with animal feed law enforcement responsibilities;
- Animal Feed Unit has produced a distillation of key points from the ACAF Report and this was handed out at stakeholder meetings held throughout the UK at the end of 2003 and in 2004. It has also had meetings with representatives of Assured Food Standards (AFS) urging the further development of codes of practice and assurance schemes to address the particular hazards (e.g. poor sourcing, storage and transport of feed materials) associated with on-farm mixing and feeding;
- Some Trading Standards Officers have drawn up their own advisory materials based on the ACAF Report and its recommendations and are using these as aide memoires/advice sheets for farmers;
- The Agency's Animal Feed Unit has obtained the European Commission's agreement that it will take the ACAF Report into account when finalising the

Annexes to the Feed Hygiene Regulation (which provides for the development, dissemination and use of guides to good practice in the feed sector); and

- An eye-catching A3 poster containing key messages from the ACAF Report will be printed for distribution to on-farm mixers and farming organisations throughout the UK later this year.

**FOOD AND VETERINARY OFFICE RECOMMENDATIONS ON UK
ENFORCEMENT OF ANIMAL FEED CONTROLS**

The FVO has recommended that the UK should:	Progress to Date
1. Provide adequate guidance to enforcement bodies to ensure that a uniform approach is taken to inspections and all parts of the feed chain are covered;	A Code of Practice (CoP) on feed law enforcement is being drawn up, to which local authorities must have regard. It is similar to the codes that currently exist for food law enforcement in that it will cover guidance on a wide range of areas, including inspection procedures and frequencies. It will also set out the legislative controls that apply to imported feeds and the related enforcement powers and procedures. The CoP will be issued for consultation at the end of May 2005.
2. Consider the effectiveness of the current division of responsibilities of the different enforcement authorities and ensure that there are no gaps or overlaps;	A Memorandum of Understanding has been agreed between local authorities and the Animal Medicines Inspectorate (which enforces controls on zootechnical feeds) which clarifies responsibilities. The CoP will also set out guidance on enforcement responsibilities. ACAF has reviewed the current system for feed law enforcement and made a number recommendations designed to increase the effectiveness of enforcement authorities.
3. Develop a national inspection programme to cover all parts of the feed chain including imports;	A National Inspection Plan for 2005/06 was issued to local authorities in January 2005. This covered risk-based inspection priorities including for imports. Local authorities are required to provide details of their enforcement activities to the Agency and this information will be used to monitor the implementation of the Plan.
4. Review the arrangements for taking formal and informal samples of feed in order that appropriate action can be taken in response to breaches of legislation;	The CoP will include guidance on sampling procedures. As there are difficulties in following the complicated EC procedures for sampling large consignments, the Agency has written to the European Commission to ask for this area to be reviewed.

<p>5. Ensure that adequate resources are available to enforcement bodies;</p>	<p>ACAF has considered this as part of its review of feed law enforcement. The Committee has recommended that best use of existing resources should be made by adopting a risk-based approach to enforcement, and that additional funds for feed law enforcement should be provided direct to local authorities rather than by a general allocation via the Revenue Support Grant.</p>
<p>6. Publish lists of approved and registered feed premises.</p>	<p>Lists of approved and registered feed premises have been published on the Agency's website since January 2005.</p>

ACAF REVIEW OF FEED LAW ENFORCEMENT

CONCLUSIONS AND RECOMMENDATIONS (in bold text)

1. Full and effective enforcement of feed law is necessary to ensure feed and food safety. The existing activities of feed law enforcement authorities have provided a good level of enforcement in certain areas but have been found lacking in others. This has been due in part to the fact that responsibility for enforcement rests with a number of different authorities that often act independently of each other. In addition, there have been shortcomings in the way in which feed law enforcement has been funded. The UK imports significant quantities of feed materials, but the number of checks on imported feeds is low, increasing the risk to feed/ food safety.
2. The Committee concluded that the current situation is unacceptable, and measures need to be introduced to ensure a more consistent and effective programme of feed law enforcement. Resources for enforcement are not unlimited, and the Committee concluded that priorities should be based on an assessment of the risks that animal feeds present to livestock and those consuming animal products. In recent years a number of assurance schemes have been developed and adopted by the feed and farm sector. Most of these reflect statutory requirements and are aimed at improving the quality and safety of animal products. The Committee concluded that information gathered as part of these schemes could make a useful contribution to establishing a risk-based approach to enforcement within the UK.
3. The lack of co-ordination between enforcement authorities in Great Britain leads to inconsistent enforcement. Closer co-operation between different enforcement authorities is essential to improve feed law enforcement across the UK. The Committee concluded that the Food Standards Agency was well placed to take on this co-ordination role.
4. The Committee considered alternative models to the existing system of feed law enforcement. It concluded that those alternatives which involved the creation of new agencies to deliver feed law enforcement represented major undertakings. To be effective these alternatives would require significant investment of time and resources. **The Committee recommends that the current responsibilities for feed law enforcement in the United Kingdom should continue with significant modifications made to processes and procedures to ensure the necessary improvements to feed law enforcement.**
5. The Committee recognised that any changes to current enforcement systems should be commensurate with the risks which animal feeds present to consumers eating animal products and to animal health. The Committee identified a number of priority areas that need to be considered in relation to the strengthening of feed law enforcement. **The Committee recommends that**

enforcement authorities adopt a proportionate risk-based approach to the enforcement of feed law.

6. The Committee noted that LACORS have a risk-based scheme largely based on premises type. **The Committee recommends that risk-based schemes for feed law enforcement should be extended or introduced to take into account risks from hazards such as contaminants, unauthorised additives and feeds from unverified sources.**
7. One of the alternative models for feed law enforcement was the possibility of including a role for assurance schemes. The Committee concluded that it would not be appropriate to give assurance scheme inspectors a formal enforcement role. Assurance schemes that reflect provisions of feed law have a significant part to play in the risk assessment of premises. In order to promote a risk-based approach to enforcement there is a need to identify areas where assurance scheme checks meet statutory requirements. **The Committee recommends that there should be a greater sharing of information and co-operation between official enforcement authorities and assurance scheme auditors.**
8. There is a need to ensure that there are no gaps or duplication of checks on premises and to ensure common standards of enforcement are applied. The Committee was informed that to help ensure this objective, LACORS and the AMI were drawing up a Memorandum of Understanding (MoU). **The Committee recommends that there should be greater co-ordination between enforcement authorities.**
9. A number of agencies have responsibilities for making feed legislation and for its enforcement. The Food Standards Agency has responsibility for making legislation on the composition and marketing of animal feed. Although the Agency is not responsible for feed related legislation made by the Agriculture Departments, the Food Standards Act 1999 provides it with certain formal powers it can exercise in this area, e.g. the right to publish its advice to Ministers or other government departments. On a less formal basis, there is a need for the co-ordination of feed law enforcement activities, e.g. to develop a risk-based approach to inspections. **The Committee recommends that further co-ordination of feed law activities is required and considers that the Food Standards Agency is well placed to take on this role.**
10. Lists of premises concerned with feed production and use are variously held by local authorities and, nationally, by competent authorities. Such lists are required under Directive 95/69/EC on the approval and registration of establishments and will be further extended with the introduction of the EC Feed Hygiene Regulation. Compilation of these lists by a single authority would ensure coverage of all feed businesses and, with the addition of further information, could form the basis of a database for use as a common resource available to all enforcement agencies. In addition to records of formal inspections, inclusion of information on involvement in assurance schemes could aid the direction of resources to establishments considered to present the greatest risks. **The Committee recommends the compilation of a central**

database of feed businesses available to all enforcement agencies. The Committee further recommends that all relevant information should be considered for inclusion in a central database to help establish enforcement priorities.

11. The Committee noted that many feed materials are imported for use in compound feeds or to be fed straight to animals. It is important that imports should be part of a risk-based programme. At present limited checks are made on such imports at point of entry largely because local authority enforcement officers, who are often not based at ports, lack intelligence on the arrival of imports. It is also difficult to obtain samples using formal sampling procedures. The Food Standards Agency has written to the European Commission asking for the sampling procedures to be reviewed and simplified and the Committee supports this approach. **The Committee recommends that animal feed imports should be part of a risk-based enforcement programme. The Committee further recommends the introduction of a statutory requirement for the prior notification of imports of animal feed.**
12. The Committee notes the shortcomings associated with the current system of funding local authorities in England and Wales for carrying out their feed law enforcement responsibilities. However, it recognises the difficulties in making fundamental changes to a system which is designed to deliver resources for a wide range of local government functions. **The Committee recommends that local authorities should make better use of existing funds by targeting higher risk areas. The Committee further recommends that if funds for new work become available, the Food Standards Agency and other government departments should consider providing such funds direct to the appropriate enforcement agencies.**
13. The Committee notes that the FVO mission recommended that there should be provision of adequate guidance for the supervision of official controls in order to ensure uniform and comprehensive enforcement. In addition, there is a need for enforcement authorities to receive direction from central government on priorities and we are aware that the Food Standards Agency is drawing up a national inspection programme based on previous results and risks. Such a programme may be formalised by linking it to the proposed Codes of Practice for Feed Enforcement. In its response to the FVO, the UK pointed out that it intended to prepare Codes of Practice for Feed Enforcement by local authorities. **The Committee recommends the introduction of codes of practice for all areas of feed law enforcement. The Committee further recommends that the codes of practice that apply to local authorities should be included within the scope of the Food Standards Agency's Framework Agreement with local authorities. The Committee also recommends that compliance with the codes of practice should be audited by the Food Standards Agency under the terms of the Framework Agreement.**

FEED LAW ENFORCEMENT WORK UNDERTAKEN BY THE AGENCY'S ANIMAL FEED UNIT AND DEVOLVED ADMINISTRATIONS

1. Directive 95/53/EC on the organisation of official inspections in the field of animal nutrition requires Member States (MS) to report annually on their enforcement activities. The Commission makes an overall summary of Member States' returns and submits this to the European Parliament. The information provided by Member States in their enforcement returns to the Commission helps identify areas that might require a co-ordinated approach at EU level.
2. On the basis of this information and other intelligence, the European Commission makes recommendations for an EU-wide co-ordinated inspection programme, which Member States should reflect in their national inspection plans. Recommendations for 2002 and 2003 indicated that analyses of feeds should be carried out for a range of contaminants. In particular, Member States were asked to check for levels of heavy metals such as lead and cadmium and for levels of a number of mycotoxins (aflatoxin B1, deoxynivalenol and zearalenone).
3. The UK return for enforcement activities conducted in 2002 largely reflected the special programme of work by local authorities referred to below. For the 2003 return, local authorities reported on over 4,000 analyses of feeds. These included checks for substances identified in the Commission's co-ordinated inspection programme as well as analyses for levels of feed additives (e.g. vitamins and trace elements) and checks to ensure that feeds had been correctly labelled. The results indicated that the vast majority of feeds analysed complied with the requirements of feed law, although there was a small number of feeds and miscellaneous constituents, which had not been correctly labelled.
4. Member States and the European Commission are currently reviewing maximum permitted levels (MPLs) for dioxins in animal feed and will be introducing new limits for dioxin-like PCBs. During the process, the Commission established a collaborative study in which the United Kingdom, along with other Member States, analysed a range of animal feeds for dioxins and dioxin-like PCBs. Out of 158 samples collected throughout the UK, one sample was found to exceed the limit for dioxins by a small margin, with a further sample found to be 'borderline'. All other samples complied with the relevant dioxin limit. MPLs for dioxins for foods already exist, and these help ensure that consumers are not exposed to

significant levels from their diets. Food Standards Agency officials are of the view that the levels of dioxins found in the samples of feed analysed would be unlikely to lead to foods derived from animals consuming these feeds exceeding their MPLs.

Local authority sampling and analysis

5. In 2002 84 local authorities in Great Britain took part in a programme of sampling and analysis of animal feed products co-ordinated by the Food Standards Agency. The substances whose levels were determined in feed samples taken by the local authorities included contaminants (e.g. lead and dioxins), feed additives (e.g. copper and vitamin E) and a group of miscellaneous substances (e.g. fibre, calcium and protein). Just under 4,000 samples were taken and levels of about 90 substances (or groups of substances) were determined.
6. The results of this work were reassuring in terms of consumer safety and animal welfare; the vast majority of the analyses complied with any corresponding statutory maximum limits. Local authorities have enforcement responsibility for these areas of animal feed legislation and they undertook follow-up action where they considered it appropriate. Reports summarising the local authorities' data have been placed on the Agency's website.
7. Agency officials will shortly be meeting with representatives of the feed industry to discuss the results of the local authority sampling and analysis programme. Together with representatives from local authorities, they will also consider what further sampling and analysis should be undertaken.