

Consultation on proposed (provisional) authorisations of four feed additives for use in animal feed - Summary of stakeholder responses

The consultation was issued on 26 May 2023 and closed on 9 June 2023.

This report is a summary of the consultation results and the main themes identified from written feedback.

Stakeholders' views were sought in relation to the proposed provisional (urgent) authorisations of four Cobalt(II) compounds to be placed on the GB market in accordance with Retained EU Regulation 1831/2003.

The feed additives included in this consultation are currently authorised for use in GB. They are also currently authorised in Northern Ireland (NI), in line with legislation that applies in NI/European Union including the Windsor Framework. This authorisation expires 15 July 2023.

The feed additives on which the consultation sought views were:

- RP1798 – cobalt(II) acetate tetrahydrate (3b301)
- RP1798 – cobalt(II) carbonate (3b302)
- RP1798 – cobalt(II) carbonate hydroxide (2:3) monohydrate (3b303)
- RP1798 – cobalt(II) sulphate heptahydrate (3b305)

Stakeholders were specifically asked to consider the Food Standards Agency's (FSA's) opinion and the other legitimate factors (for example, animal health concerns, consumer interests and technical feasibility) that the FSA identified as relevant to these applications.

Consultation reach was broad, with automatic notifications sent at the time of launch to 34,170 UK-wide (England, Wales and Northern Ireland) subscribers to notifications on consultations. FSA directly contacted key stakeholders whose businesses/organisations are affected by, or have an interest in, UK feed additives policy. The consultation was shared with the FSA's 61,000 Twitter followers and 107,300 LinkedIn followers. The consultation page was viewed by 400 visitors. The supporting information '[FSA opinions cobalt 25 May 2023](#)' [A Review of Nutritional Supplements currently available on the UK market](#) was accessed 82 and 18 times respectively during the consultation period.

The FSA welcomes, and is grateful for, the responses, which are grouped by theme in Table 1 below. A list of those who responded can be found at the end of this document.

Characteristics of respondents

A total of 14 consultation responses were received from trade bodies, non-governmental organisations (NGOs), and other government departments (OGDs), representing interests across the UK.

Summary of responses

All 14 responses received were supportive of the proposal to issue an urgent authorisation for the 4 cobalt additives, recognising the negative impact on animal health if these additives were removed from the GB market. Most responses represented views of multiple stakeholders. Prior to issuing this consultation, the FSA engaged with the Agricultural Industries Confederation (AIC) and the British Association of Feed Supplements and Additive Manufacturers (BAFSAM). These organisations canvassed their members and provided strong evidence in support of the authorisations which was included in the consultation documentation.

Table 1: Summary of substantive comments

The responses to the consultation have been analysed and the main themes identified. The FSA's response to the comments made are included in the table below.

	Main theme of response	Summary of Stakeholders' Comments	FSA's Response
1	Support for authorisations	<p>Respondents commenting on behalf of industry were in support of the authorisations. The main reasons cited were that:</p> <ul style="list-style-type: none"> • Cobalt supplements in different and appropriate delivery mechanisms are essential to maintain animal health particularly in specific geographical areas known to be short of natural availability. • The current authorisation is set to expire on 15 July, a time when the requirement for such supplementation is at its peak for many farmers. • Other mineral deficiencies may develop as cobalt products contain other important minerals and additives. • Re-formulation or use of the coated granulated cobalt(II), which will remain on the market is not possible for some manufacturers and would require market withdrawal for 6-20 months while products are developed. <p>Respondents commenting on behalf of OGDs included veterinary leads who also support the urgent authorisations. The main reasons cited were ensuring that animals remain healthy and productive.</p> <p>Respondents raised concerns that diagnoses of cobalt deficiency would increase significantly if these four feed additives became unavailable and negatively impact public opinion.</p>	Comments noted.
2	Consequential concerns	<p>Some respondents raised concerns about the financial impacts for farmers, industry and the agri-sector if these additives were unavailable.</p>	

Next Steps

- The next step of the authorisation process is for Ministers in England and Wales to make decisions on the authorisation. In the absence of Ministers in Northern Ireland, the Northern Ireland Department of Health Permanent Secretary will be informed of the recommendation to authorise. The FSA/FSS opinion concluded that the feed additives are safe to be authorised on a provisional basis in accordance with the proposed terms of authorisation. No reasons to change the advice that these feed additives should be authorised for five years have been identified during the consultation process. On that basis, the final FSA advice to Ministers will be to authorise these feed additives on the proposed terms of authorisation outlined in the FSA opinion.
- If Ministers agree to authorise, Statutory Instruments will be prepared in England and Wales in line with the terms of authorisation previously outlined in the FSA opinion.
- Regulations in Northern Ireland will not be amended as the feed additives are authorised for use in Northern Ireland. This is in line with EU legislation that applies in Northern Ireland, under the Windsor Framework.

List of respondents

1. Farmers' Union of Wales
2. National Farmers' Union
3. Rumenco Ltd
4. Nettex Ltd
5. Feed, Food & Future Ltd
6. Telsol Ltd T/A Bimeda
7. British Equestrian Trade Association
8. APHA Small Ruminant Expert Group
9. National Farmers' Union Cymru
10. APHA Cattle Expert Group
11. UK Pet Food
12. Agricultural Industries Confederation (AIC)
13. Carst & Walker
14. ForFarmers UK Ltd
15. BAFSAM