

To: Lead Feed Officers  
Cc: TSI, CoSLA, SFELC

31 May 2018

FSS/ENFTS/18/004

Dear Colleague,

### **Premises Update – Request for Information**

FSS is grateful for the responses received to the request for updated premises information issued on 24<sup>th</sup> January 2018. An update to this information is also requested to include those premises and inspection visits that have changed since that request, i.e. covering the period 1<sup>st</sup> January 2018 – 31<sup>st</sup> March 2018. The information requested is as follows:

- An update of the registered feed premises in your authority area since January 2018. An exception report is requested only if possible – new or removed premises, or any other changes to the premises information provided in January 2018. Please include telephone number/email contact details with any premises information.
- Summary details of inspection visits carried out since January 2018 – inspection date, confirmation of premises type and compliance score, identifiable to each premises, similar to the information provided in March 2017 and January 2018.

If this information was not supplied in response to the January 2018 request, please provide the above for the whole of 2017/18. Please provide any lists of premises etc in Excel format, and not Word.

Also attached at Annex 1 is a copy of the privacy notice relating to GDPR requirements as applicable to the feed register; this is also available on the [FSS website](#).

This information should be sent to [feed@fss.scot](mailto:feed@fss.scot) by **Friday 20<sup>th</sup> July 2018**.

## Feed Law Enforcement Returns for 2017/18 (Enforcement and Sampling Activity)

FSS is also requesting the annual feed law enforcement return from your local authority for the 2017/18 financial year. Data for the 2017/18 financial year will form the basis of the UK annual report to the European Commission.

Annex 2 provides guidance on completing the Feed Enforcement Returns. Annex 3 is the new format of spreadsheet to be used for providing details of enforcement and sampling activities undertaken in 2017/18. If your sampling activity and analysis results for 2017/18 are on UKFSS, there is no need to complete the sampling sections of the spreadsheet at Annex 3. Please indicate, when making your return, that sampling data can be obtained from UKFSS. Annex 4 is the National Agriculture Panel guidance on the registration of feed business operators, which provides some more detailed information on some of the business categories.

Once completed, please email your enforcement returns to [feed@fss.scot](mailto:feed@fss.scot) by **Friday 20 July 2017**.

## Monthly Feed Law Enforcement Returns 2018/19

FSS also wish to monitor the on-going level of feed enforcement activity throughout the year 2018/19. Following consultation with SCOTSS, it has been agreed that FSS will ask local authorities for monthly enforcement returns throughout the current year. These will provide the required on-going information, and will replace the annual enforcement return that would be requested at the end of 2018/19. Two further spreadsheets for April and May 2018 are attached as Annexes 5 and 6 respectively, in the same format and requesting the same information as the annual return spreadsheet at Annex 2. Once completed, please email these monthly returns to [feed@fss.scot](mailto:feed@fss.scot) by **15<sup>th</sup> June**.

For subsequent months, FSS will issue a blank spreadsheet before the end of the month, and will request completion by the middle of the following month.

## Urea

We believe there may be a number of businesses placing urea on the market which are not currently approved. We would ask that local authorities consider if there are businesses in their area that may be placing urea on the market (e.g. country stores) and approve them.

Urea is currently authorised as an additive for use in animal nutrition and Regulation 1831/2003 in Article 5 provides the general conditions for its authorisation. In the EU Register of Feed Additives at: [http://ec.europa.eu/food/food/animalnutrition/feedadditives/registeradditives\\_en.htm](http://ec.europa.eu/food/food/animalnutrition/feedadditives/registeradditives_en.htm)

As a nutritional additive, urea meets the criteria for approval under Article 10 (1) (a) of Regulation (EC) No. 1831/2003 i.e. placing on the market of feed additives covered by Regulation (EC) No 1831/2003 or products covered by Directive 82/471/EEC and referred to in Chapter 1 of Annex IV to this Regulation (activity code A1). "Placing on the market" is defined within Regulation 178/2002 as: *"the holding of food or feed for the purpose of sale, including offering for sale or any other form of transfer, whether free of charge or not, and the sale, distribution, and other forms of transfer themselves"*.

Regulation (EC) No. 882/2004, Article 27: “as regards the activities referred to in Annex IV, section A, and Annex V, section A, Member States shall ensure the collection of a fee.”

Section A of Annex IV includes “*The approval of feed establishments*”

The Feed (Hygiene and Enforcement) (Scotland) Regulations 2005 require fees to be collected and Schedule 2 provides fees for approvals.

Further information on this subject and advice on fees can be found in the [Summary of Technical Queries discussed at the National Agriculture Panel \(NAP\) \(Question 4\)](#) on Knowledge Hub.

## **Unregistered Premises**

FSS will continue to ensure the feed business database is as complete and accurate as possible prior to assuming responsibility for its maintenance. It would be appreciated that prior to implementation of the feed delivery model, local authorities make final efforts to ensure the completeness of the feed premises register. One specific area where premises may be unregistered is in the meat processing industry, which consists of premises that should be registered as R12 if their by-products are used in pet food manufacture. It is recognised that local authorities may be aware of other examples of premises which have not been registered for feed, and this is discussed more fully at Annex 7, the National Agriculture Panel guidance on the recording of unregistered FeBO's. FSS is aware of unregistered farm information, so local authorities should concentrate any efforts on non-farm premises.

FSS will be requiring a further update of feed premises at the end of 2018/19, which should include unregistered premises.

If you have questions about the returns or any problems completing the spreadsheets, please do not hesitate to contact me.

Yours faithfully

Phil Hindell  
Food Standards Scotland

## Enclosures

Annex 1: Feed Premises Privacy Notice

Annex 2: Guidance for completing the feed enforcement returns

Annex 3: Enforcement activity return 2017/18

Annex 4: NAP Guidance on the registration of feed business operators

Annex 5: Monthly Enforcement Activity Returns for April 2018

Annex 6: Monthly Enforcement Activity Returns for May 2018

Annex 7: NAP Guidance on Recording of Unregistered FeBO's