



FSS/ENFTS/19/003

National Feed Enforcement Priorities For Scotland

2019-2020

Feed law enforcement (at all stages of production, processing, storage, transportation and distribution, including import/export and the primary production of feed)

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Executive Summary

The UK feed and food export industry, worth [£22 billion](#) currently, accounts for 60% of exports and it is imperative that future official controls delivered provides assurance to the UK's trading partners. Like any major industry, it is vulnerable to a wide range of criminal activity.

This document sets out Food Standards Scotland's

- National Enforcement Priorities in respect of animal feed;
- expectations of local authorities to implement, where relevant, these priorities as part of their intervention programme over the next few months.

The priorities:

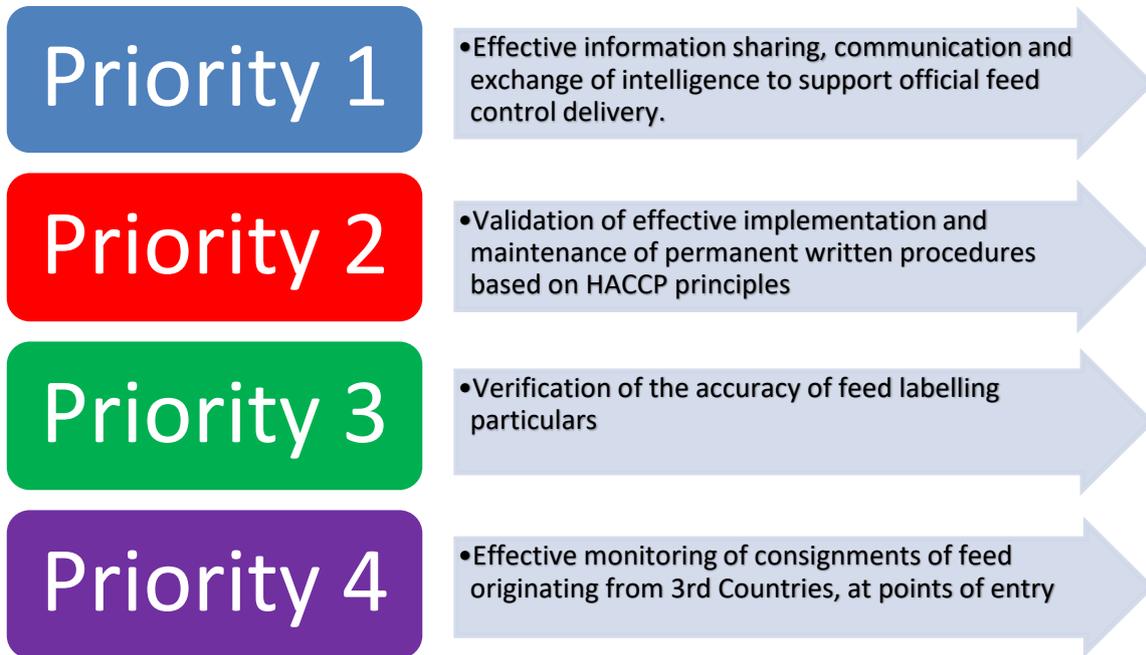
- have been informed by FSA's Strategic Animal Feed Threat Assessment 2019 (AFTA 2019);
- have been developed in consultation with FSA, the feed industry and LA representatives through National Trading Standards, the National Agriculture Panel (NAP) and National Animal Feed at Ports Panel (NAFPP) members; and
- support our [Regulatory Strategy](#) vision to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers.

The objectives of the priorities are to:

- drive an intelligence led approach to official controls, focusing resources on higher risk and non-compliant business, placing an increased focus on outcomes
- maintain a level playing field for honest and diligent feed businesses, which is in the interests of industry as a whole
- reduce unnecessary burdens on business by focusing LA activity on agreed areas of greatest threat to public and animal health
- create a flexible and intelligence-led approach to interventions, placing an increased focus on outcomes
- Support [FSS's Strategy to 2021 \(Shaping Scotland's Food Future\)](#), in particular Strategic Outcome 1 (Food is Safe) and Outcome 4 (Responsible Food Businesses Flourish)

Feed business operators have a legal obligation to comply with feed law and we call on the feed industry, and in particular approved assurance schemes, to proactively promote the importance of driving up compliance in the identified risk areas.

National Enforcement Priorities for 2019/20¹



¹ The priorities are not listed in any particular order

Animal Feed National Priorities

Priority 1: Effective information sharing, communication and exchange of intelligence to support official feed control delivery

Our [strategic plan](#) describes our approach to evidence. Gathering and exchange of information, data and intelligence between Competent Authorities, central government departments and industry is a key element to an effective risk-based system of official feed controls.

LAs are expected to give priority to ensuring effective information sharing, communication and exchange of intelligence to support official feed control delivery by:

- a) proactively use the recognised trading standards national intelligence databases ([IDB](#) and Memex) to record intelligence, share with, and report to, the Scottish Food Crime and Incidents Unit ([SFCIU](#)) all intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases
- b) liaising, as appropriate, with inland authorities and proactively sharing information and intelligence in accordance with ACTSO guidance on [inland referrals](#).
- c) acknowledging and responding, in a timely manner, to authorities, when matters are referred inland, to confirm action taken, providing as much supporting information as possible
- d) liaising with the LA responsible for the nearest large point of entry for feed, or other appropriate point of contact, to use their expertise and co-operation to assist in implementing a proportionate system of official controls
- e) liaison with Food Standards Scotland in accordance with the requests outlined in [FSS/ENFTS/19/001](#)

Priority 2: Validation of effective implementation and maintenance of permanent written procedures based on HACCP principles

LAs are expected to give priority to validating appropriate implementation and maintenance of permanent written procedures based on HACCP principles by ensuring FeBOs understand legal requirements, are implementing and maintaining and reviewing, as appropriate, their feed safety management systems, having regard to the nature, size and scale of business.

This should include a focus on the following:

- a) examination of written feed safety management systems
- b) identification of hazards ensuring all steps in the process have been considered and any grouping of steps (e.g. consideration of individual ingredients) is appropriate and not done in such a way that hazards are overlooked or applied incorrectly
- c) that Critical Control Points are correctly identified, properly defined and controlled. Where hazards within the CCP are already adequately controlled by a pre-requisite procedure, the necessity for a critical control point should be raised with the FeBO
- d) establishing that appropriate systems are in place to minimise cross-contamination between batches of feed (particularly in respect of those containing coccidiostats, veterinary medicines or [additives](#) with maximum permitted levels for particular target species
- e) appropriate sampling programmes at the feed business are in place to verify compliance with maximum permitted levels of undesirable substances in feed materials and additives. Checks should include an examination of results of analysis and consideration of whether appropriate action has been taken
- f) scrutinising traceability systems to ensure that products not intended for feed use are not diverted into the feed/food chain

Priority 3: Verification of the accuracy of feed labelling particulars

Information on feed labels is essential to enable FeBOs, throughout the feed chain, to make appropriate use of material they use to manufacture feed or use as feed. The presence and accuracy of:

- labelling information is critical in ensuring feed is provided to the correct species, age of animal and in quantities that would not adversely affect human and/or animal health or impact on traceability
- batch codes aids prompt recall and withdrawal of affected products in the event of a feed safety incident

LAs are expected to give priority to:

- a) verifying the accuracy of claims as set out in Article 13 of [Regulation \(EC\) No 767/2009 on the placing on the market and use of feed](#)
- b) ensuring labelling and presentation of feed does not mislead the user, particularly in respect of the country of origin, quality and method of manufacture or production e.g. organic and non-GM²
- c) additives present in feed are [authorised](#) in line with [Regulation \(EC\) No 1831/2003 on additives for use in animal nutrition](#)

Priority 4: Effective monitoring of consignments of feed originating from 3rd Countries, at points of entry

Imported feed makes up 40% of feed used in the UK annually. Sampling imported feed is a key mechanism to ensure the safety and quality of feed and food entering the UK.

To support a consistent and risk-based approach to monitoring 3rd country imports, LAs are expected to give priority to monitoring consignments of feed originating from 3rd countries, in consideration of:

- a) ACTSO [guidance](#) on consistency and prioritisation of the delivery of official controls at points of entry
- b) sampling consignments which have not been sampled recently or have not been seen before at the point of entry or where there is reason to believe they might fail to comply with legal requirements

² Genetically Modified

Guidance

ACTSO National Inspection Co-producer [guidance](#)

ACTSO national co-producer inspection [form](#) and data collection [form](#) (non-conformances identified during interventions)

Community [guides](#) to good practice were developed in accordance with Article 22 of [Regulation \(EC\) No 1831/2003](#) laying down requirements for feed hygiene

[Codex Alimentarius Standards](#) relevant to feed

[PAS 222:2011](#) Prerequisite programmes for food safety in the manufacture of food and feed for animals

FSS guidance on [HACCP-related requirements of the Feed Hygiene Regulation for farmers](#)

European Feed Manufacturers (EMFC) [guide](#) published by the European Feed Manufacturers' Federation (FEFAC) on good practices for the industrial manufacturing of compound feed and premixtures for food producing animals

EU Codes of Good Practice on [food producing animal](#) and [pet food](#) labelling and [FSA guidance](#)

EU community [guide](#) to good practice for feed additive and premixture operators

EU [guide](#) to good practice for the industrial manufacture of safe feed materials

EU [guide](#) to good hygiene practices for the collection, storage, trading and transport of cereals, oilseeds, protein crops, other plant products and products derived thereof

Defra [Code of Practice](#) for the control of salmonella during the production, storage and transport of compound feeds, premixtures, feed materials and feed additives

EU [Guide](#) on the manufacturing of safe feed materials from starch processing

EU [Guide](#) on the manufacturing of safe feed materials from oilseed crushing and vegetable oil refining

EU [Guide](#) on the manufacturing of safe feed materials from biodiesel processing

[Salmonella auditor checklist](#)

[Salmonella factsheet](#)

FSA [guidance](#) on the presence of food grade packaging material in feed in September 2013

[Guidance](#) on former foodstuffs eligible for feeding

[Advisory Committee on Animal Feeding Stuffs](#) review of on-farm feeding practices - updated [recommendations](#) on identifying hazards and minimising risks

Industry [Code of Practice](#) for on-farm feeding, which applies to farmers and covers all aspects of on-farm feeding, including on-farm mixing

[Good Practices for the feed industry](#) – implementing the Codex Alimentarius Code of Practice on good animal feeding

Industry Standards

- AIC Feed Material Assurance Scheme Standards ([FEMAS](#));
- AIC Universal Feed Assurance Scheme ([UFAS](#));
- AIC Trade Assurance Scheme for Combinable Crops ([TASCC](#)); and
- [BRC Voluntary Module 9](#) – Management of Food Materials for Animal Feed.

Imported Feed

ACTSO [guidance](#) on sharing information and intelligence to support delivery of imported feed controls