

# National Feed Enforcement Priorities for Scotland

## 2020-2021

Feed law enforcement will apply to Feed business operators (FeBO) who manufacture, store and transport feed materials, additives, specified feed additives, premixtures, and compound feeding stuffs, medicated feeding stuffs and who import and export animal feed.

July 2020

## Executive Summary

The Scottish feed export and import industry has a value of £543,414<sup>1</sup>, imports account for 65% when compared to 35% of exported feed. It is imperative that future official controls, provides assurance to the feed industry within the UK transition period with the European Union (EU). Scotland's world class standards of agriculture must not be compromised with a threat of criminal activity. On exit from the EU, Scotland will become a third country, and such for animal feed, there will be a need to demonstrate compliance with EU legislation above and beyond the standards already being taken, particularly when there is a drive for industry assurance and earned recognition to be more readily integrated into business operations. However, with budgets and numbers of Local Authority (LA) authorised feed officers in considerable decline, there is a correlating threat to the potential for reduced enforcement. The rapid rise of COVID-19 is impacting every aspect of life. In these unique circumstances now more than ever, working together to address the key official control issues is crucial.

This document sets out Food Standards Scotland (FSS):

- 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 year;
- Role as central competent authority with regard to feed law and the feed code of practice for competent [authorities](#).

The priorities:

- Aim to support our [Regulatory Strategy](#) vision to create a food and drink environment in Scotland that benefits, protects and is trusted by consumers;
- Have been developed in consultation with the Food Standards Agency, the feed industry and LA representatives through National Trading Standards, the National Agriculture Panel (NAP) and National Animal Feed at Ports Panel (NAFPP).

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<sup>1</sup> Source: HMRC Regional Trade Statistics (Extracted 8<sup>th</sup> April 2020)

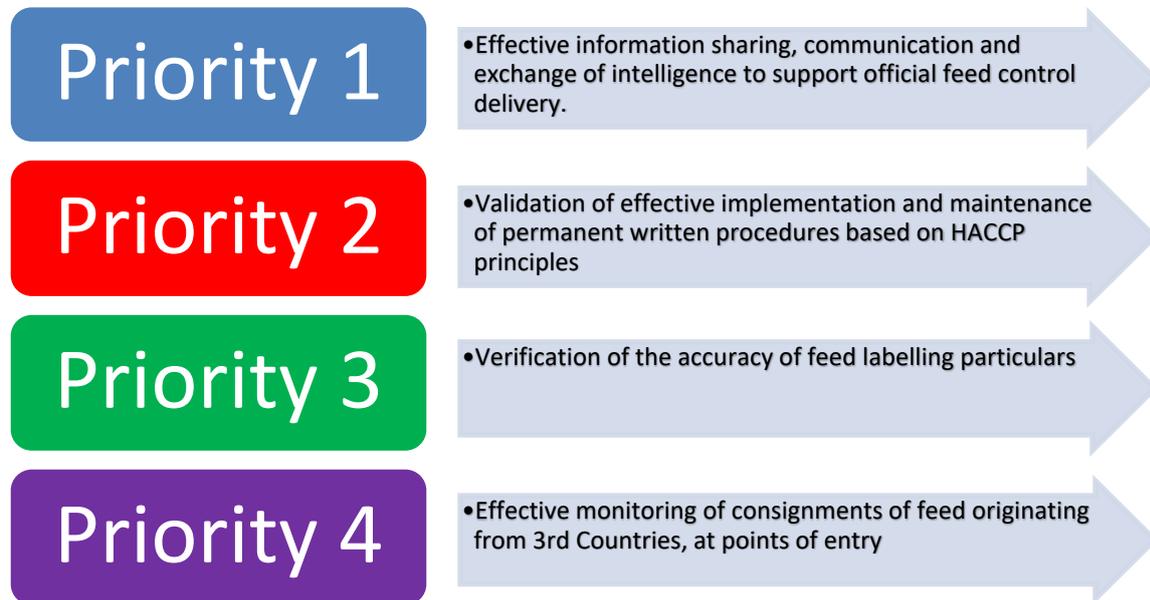
The objectives of the priorities are to:

- 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 human 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 (FeBO) have a legal obligation to comply with feed law and we call on the feed industry, and in particular FSS [approved](#) assurance schemes, to proactively promote the importance of driving up compliance in the identified risk areas.

These priorities will be reviewed on a six-monthly basis in light of any emerging issues or other intelligence received by us regarding risks to human, animal health and welfare or the environment.

## National Enforcement Priorities for 2020/21<sup>2</sup>



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<sup>2</sup> 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.

Local authorities 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 (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 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

Local Authorities are expected to give priority to validating appropriate implementation and maintenance of permanent written procedures based on HACCP principles by ensuring FeBO 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 (CCP) 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 any FeBO, 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.

Competent authorities 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-GM<sup>3</sup> ;
- 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 3<sup>rd</sup> Countries, at points of entry**

Imported feed makes up 65% of feed used in the Scotland annually. Sampling imported feed is a key mechanism to ensure the safety and quality of feed at points of entry in Scotland.

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

- a) FSS [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.

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<sup>3</sup> Genetically Modified

## Guidance

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**

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