



National Enforcement Priorities for Northern Ireland

**Feed law enforcement and food
hygiene law enforcement at primary
production**

April 2025

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Summary

This publication aims to guide Department of Agriculture, Environment and Rural Affairs (DAERA) enforcement officers in Northern Ireland on the areas to focus on during the delivery of official controls for:

- feed (at all stages of production, processing, storage, transportation and distribution including import and the primary production of feed) and
- food hygiene at primary production

Legal status

The following priorities are intended to support DAERA to focus their official controls, which should be conducted at the frequency set out in the Feed Guidance, Food Law Code of Practice and the Service Level Agreement.

Who is this publication for?

The National Enforcement Priorities (NEPs) should be considered alongside links to legislation and guidance to support DAERA to embed these priorities within their annual plan of official feed and food controls.

This document is primarily intended for DAERA enforcement officers. However, it will also be of interest to all food and feed business operators at the level of primary production, the Food Standards Agency (FSA), approved industry assurance schemes and private sector assurance bodies. Please note that some links in this document are only available to enforcement authority officers.

Review date

This document will be reviewed before March 2026.

Main points

This document sets out the FSA's:

- National Enforcement Priorities for Northern Ireland, in respect of animal feed at all levels of production and/or supply and food hygiene at the level of primary production
- expectations of DAERA to implement, where relevant, these priorities while delivering their intervention programme

Introduction

The objectives of the priorities are to:

- drive an intelligence-led approach when delivering official controls
- maintain a level playing field for compliant feed and food businesses, which is in the interests of industry as a whole and supports trade in feed and food
- reduce unnecessary burdens by focusing DAERA activity on areas of potential non-compliance that present a higher risk to feed and food safety
- drive up the quality and consistency of official controls
- realise [the FSA Strategy of 'Food you can trust'](#)

The priorities:

- have been informed by intelligence from non-compliance data and feed incidents
- have been developed in consultation with [National Trading Standards \(NTS\)](#) and the National Agriculture Panel (NAP).

The gathering and exchange of information, data and intelligence between competent authorities, central government departments and industry, including FSA approved assurance schemes, is a key element to an effective risk-based system of official food and feed controls.

DAERA is expected to ensure effective information sharing, communication and exchange of intelligence in accordance with the Feed Guidance. DAERA should share all intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases, with the [National Food Crime Unit \(NFCU\)](#).

National Priorities 2025/26

The priorities are not listed in any particular order; the numbering is for reference only.

Animal Feed Priorities

Priority 1: Manufacturers of Feed and/or Feed Ingredients

- a:** HACCP
- b:** Reworks, returns and waste management
- c:** Cross contamination controls
- d:** Accuracy of liquid dosing systems

Priority 2: Verification of Labelling

Priority 3: Pet Food

- a:** Raw pet food
- b:** Pet food supplements

Priority 4: Imported Feed Intelligence Gathering

Priority 5: Farms and Storage Facilities

- a:** Records
- b:** Premises
- c:** Storage
- d:** Pest control

Food Hygiene at Primary Production Priorities

Priority 6: Effective identification, registration and inspection of food businesses producing higher-risk, fresh produce operating at the level of primary production

Further information on each priority is provided in the sections below.

Animal Feed Priorities

Priority 1: Manufacturers of Feed and/or Feed Ingredients

Manufacturers of feed includes a broad range of business, which may be manufacturing feed ingredients and/or compound feed.

1a: - HACCP

DAERA is expected to give priority to verifying feed safety management systems including permanent written procedures based on Hazard Analysis and Critical Control Point (HACCP) principles. This includes ensuring Feed Business Operators (FeBOs) understand legal requirements, are implementing, maintaining and reviewing, as appropriate, their feed safety management systems and HACCP plans, having regard to the nature, size and scale of the business.

Feed manufacturers are required to put in place, implement and maintain, a permanent written procedure or procedures based on the HACCP principles.

The nationally coordinated inspection priority interim report: 2023-25 – HACCP indicated that large manufacturers were more likely to be compliant. Whereas smaller manufacturers, particularly pet food manufacturers had issues such as:

- HACCP/risk control procedures were sometimes absent or inadequate
- All applicable 'Prerequisites to HACCP' were not always identified
- Relevant Hazards were not always identified
- Inadequacies were identified in the HACCP controls and monitoring
- Staff were not aware of risks and hazards and processes to control these.

1b: - Reworks, Returns and Waste management

Reworks are generally feed which was not sold, perhaps for a quality reason, but which is still acceptable to be re-used as a feed ingredient. Reworks need to be managed appropriately at feed businesses to ensure that **traceability** and **feed safety** are maintained. At some feed mills, reworks are generated through **sieving processes** or **end of packaging runs**. As reworks are usually the unused part of the batch or the result of an exceptional occurrence, they can be overlooked and poorly managed, being put into unlabelled storage containers for example. As they still have nutritional and commercial value, feed businesses are understandably reluctant to dispose of them.

Inspections at FeBOs should look for documented procedures, documented records and evidence of appropriate or inappropriate handling relating to reworks, returns and waste materials. HACCP studies should consider what controls are required for safe handling and these controls should be evidenced as effective at the premises.

Returns are feeds which were despatched into the supply chain or to the end user but which for some reason have not been suitable for use. This may be due to administrative errors, quality issues or due to a feed safety issue. Returns may be in packaged or bulk form. The returned product may or may not be safe to re-use as a feed for another customer or as a feed ingredient. Some returns are likely to require disposal, while others may require re-processing. Returned product(s) can sometimes be suitable for reworking.

All feed returns should be managed safely. Inspections at FeBO's should focus on documented procedures, risk assessments and evidence of appropriate decision-making e.g. documented risk assessments done by suitably trained staff.

At large feed mills, bulk returns may need to be put into storage via the intake pit, thereby potentially contaminating processing lines. The situation at each feed business and for each return will be different.

Waste* and materials not suitable as feed should be isolated and identified and stored in a manner to ensure that they do not contaminate feed.

Some material which is not suitable for feed use, may be directed to energy production e.g. **biomass**. These materials are often indistinguishable from feed and so it is essential that they are suitably identified.

Waste can also become a source of food and harbourage for rodents, so ensuring good practices are in place will have an impact on feed safety. Edible waste should be covered to prevent attracting birds and rodents to the site.

* While there are definitions of waste within law, 'waste' is also a term commonly used by businesses to refer to anything which isn't their primary product.

1c: - Cross contamination Controls

Cross contamination is the unintentional contamination of one feed with another.

The risks are different at each feed manufacturer. The HACCP plan should identify the cross-contamination risks and outline their controls.

Inspections at FeBOs should focus on verification of the HACCP controls relating to cross contamination.

Consideration should be given to:

- a) Segregation of compound feed from feed ingredients
- b) Segregation of medicated feed (e.g. feed with coccidiostats) from non-medicated feeds
- c) Controls to prevent carry over from one batch of feed to the next. Sometimes a flush batch is used (see note) while at other times scheduling of the production avoids for the need for a flush.

- d) Ensuring bulk bins for finished feed are empty before re-using

Note: A flush batch can take different forms:

- a small amount of a feed material which goes on to be disposed of. Typically, limestone is used for flushing the hand tip point and wheatfeed for the main processing lines.
- a chaser batch, wherein a portion of the original batch is held back before potential contaminants such as coccidiostats are added. This part of the original batch (the chaser batch) is used to flush out the mixer and other processing equipment. It ends up getting included in the same finished product bin as the original batch.

Verification of the effectiveness of cross contamination controls identified in the HACCP plan should be reviewed with the FeBO.

1d: - Accuracy of liquid dosing systems

Some feed ingredients are incorporated into feed via volumetric dosing systems. Fats such as soya oil are frequently sprayed onto compound feed post pressing. Some feed additives such as liquid methionine, enzymes or mould inhibitors can be added to feed via liquid dosing systems. Recent data has indicated some issues with crude fat and methionine declarations which may be linked to liquid dosing of these feed ingredients.

All scales and metering devices should be appropriate for the range of weights or volumes to be measured and be tested for accuracy regularly. Feed businesses should be able to provide evidence that liquid dosing systems are delivering the correct amounts of ingredients into the feed.

Verification of the correct additions being incorporated can be confirmed by the FeBO by testing the feed or using mass balance. Evidence of calibration (internal or external) can also be checked.

Priority 2: Verification of feed labelling

Information on feed labels is essential to enable FeBOs, throughout the feed chain, to make appropriate use of material used in the manufacture of feed or for direct feeding and for traceability in the event of a product recall or withdrawal.

DAERA is expected to give priority to:

- a) verifying additives present in feed are authorised (included in [EU Register of Feed Additives](#)) in line with [Regulation \(EC\) No 1831/2003](#) on additives for use in animal nutrition, and are supplied by appropriately approved or registered feed businesses
- b) verifying the accuracy of claims as set out in Article 13 of [Regulation \(EC\) 767/2009](#) on the placing on the market and use of feed.

- c) ensuring the traceability information is sufficient and accurate to identify the supplier of the feed and enable confirmation that the feed supplied matches the description purchased

Priority 3: Pet Food

Non-compliance data from a range of sources indicates that issues are more prevalent in the pet food sector compared to feed for food producing animals.

3a: Raw Pet Food

The microbiological risks of raw pet food are significant, with pet food often being stored in family fridges and freezers. Raw pet food gives rise to a significant number of feed incidents each year. The focus should be on hygiene, packaging integrity, traceability, storage and salmonella testing. Storage temperature is an important feed safety parameter.

Salmonella must be absent in raw pet food to be compliant with the feed safety requirements. Where test results indicate the presence of Salmonella, action should be taken to withdraw affected products from the market in accordance with [Article 20 of Regulation \(EC\) 178/2002](#). Businesses should demonstrate they have taken the necessary steps to ensure compliance with feed safety requirements to avoid reoccurrence, this may involve a review of their feed safety management controls to identify and eliminate the source of contamination.

Where Enterobacteriaceae levels are elevated, the FeBO should investigate the cause and take appropriate action, in line with APHA guidance.

3b: Pet Food Supplements

The NTS Compliance Report for 2023 – 2024 highlighted concerns about lack of compliance in the pet food supplement sector, notably in relation to unauthorised additives, labelling and claims.

Pet food supplements may be manufactured by the brand holder, contract manufactured or imported (see priority 4).

DAERA is expected to give priority to verification of labelling as indicated in priority 2. Off-pack marketing materials, including websites and social media should also be considered.

Priority 4: Imported Feed Intelligence Gathering

Imported feed, including feed ingredients, makes up a significant proportion of feed used in the UK. Post-EU exit, imports of feed from the EU are now imports from third countries.

DAERA are asked to consider imported feed when carrying out routine inspections at non-farm premises.

Most feed is not subject to official controls at the point of entry.

During routine non-farm **inland interventions**, DAERA should check if the FeBO is importing feed. Where imported feed is identified, DAERA should check if the FeBO is the importer.

For imports at the **point of landing**, to support a consistent and risk-based approach to monitoring, DAERAs should give priority to monitoring irregular consignments of feed originating from non-EU countries (including feed that has transited through the EU), in consideration of:

- a) [NTS 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
- c) the [Risk Likelihood Dashboard](#)

DAERA should prioritise **feed compliance checks** based on risk. Checks could involve reviewing certificates of analysis from the importer or sampling and analysis conducted by the FeBO.

Compliance checks should be prioritised based on the scale and severity of the potential impact related to the imported feed.

Where imported feed is placed on the market packaged and labelled ready for the end user, it should be compliant with feed law, including having a UK FeBO name and address.

DAERA are asked to prioritise **information sharing** with regard to imported feed, following the [NAFPP guidance](#).

Priority 5: Farms and storage facilities (R10, R11, R13, R14 and R9)

5a: Farm records (R10, R11, R13 and R14)

Data from the [NTS Feed Compliance report 2023 – 2024](#) and from FSA approved assurance schemes indicates record-keeping is an issue on farm premises.

Compliance with the record keeping requirements detailed in Annexes I and II of [Regulation \(EC\) No 183/2005](#) laying down requirements for feed hygiene, should be examined on farms, including:

Annex I (Primary production facilities)

- a) any use of plant protection products and biocides
- b) use of genetically modified seeds
- c) any occurrence of diseases that may affect the safety of primary products
- d) the results of any analyses carried out on samples taken from primary products or other samples taken for diagnostic purposes that have importance for feed safety
- e) the source and quantity of each input of feed and the destination and quantity for each output of feed (i.e. traceability)

and, in addition, for R10 farms subject to the requirements of Annex II:

- i. traceability records
- ii. documented procedures based on the principles of HACCP

5b: Farm and Storage Buildings (R10, R11, R13, R14 and R9)

Data from the FSA approved assurance schemes indicates that issues are regularly observed at storage premises relating to the fabric of the building. Feed is stored at farms and at dedicated storage facilities.

Annex I of Regulation (EC) 183 / 2005, which is applicable to primary production facilities for feed, states that operations shall be managed in such a way as to prevent, eliminate or minimise hazards with the potential to compromise feed safety. It also requires that feed premises are be kept clean and that feed is produced and stored in a hygienic manner.

Annex II (which is applicable at R9 and R10 premises) has similar requirements but also states that

- a) Drainage facilities must be adequate for the purpose intended; they must be designed and constructed to avoid the risk of contamination of feeding stuffs.
- b) Windows and other openings must, where necessary, be proofed against pests. Doors must be close-fitting and proofed against pests when closed.

- c) Where necessary, ceilings and overhead fixtures must be designed, constructed and finished to prevent the accumulation of dirt and to reduce condensation, the growth of undesirable moulds and the shedding of particles that can affect the safety and quality of feed.

5c: Storage on Farms (R10, R11, R13 and R14)

Data from the annual feed compliance report 2023 – 2024 noted storage as a significant issue at some farm premises.

DAERA is asked to ensure that there is suitable storage and product identification, as necessary to prevent the introduction of hazards to feed.

DAERA is expected to give priority to ensuring:

- a) separation of feed materials and additives from finished feed
- b) feed is kept separate from any non-feed materials such as plant protection products, cleaning chemicals, veterinary medicines and waste etc. that could contaminate the feed
- c) that facilities are secure from external hazards e.g. rain, sewage and other sources of contamination
- d) the suitability and cleanliness of containers for feed, where used
- e) ensure feed in storage is readily identifiable

5d: Pest control on Farms (R10, R11, R13 and R14)

Data from the [NTS Feed Compliance report 2023 – 2024](#) and from FSA approved assurance schemes indicate that pest control is a common non-compliance at farm premises.

Pest control issues are more difficult to manage at premises which are not properly proofed to prevent the ingress of pests and proofing on farm premises is not always possible. As a result, the approach often involves the use of toxic bait or other control measures.

Monitoring and record keeping are required to demonstrate that as far as possible pests are prevented from causing hazardous contamination of feed. Toxic bait should not be able to contaminate feed.

At premises with poor pest control management, DAERA is asked to focus on issues which may lead to improvements at the site, or which pose a risk to feed safety. Improvement measures can involve addressing issues such as harbourage and poor hygiene.

Further guidance can be found on the [CRRU Think Wildlife](#) website.

Food Hygiene Primary Production Priorities

Priority 6: Effective identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production

DAERA is expected to give priority to the identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production. Some examples are given to illustrate each category; however, these are not intended to be an exhaustive list and DAERA is advised to use their professional judgement.

These are:

- a) producers of soft fruits and berries, for example raspberries, blackberries, mulberries, loganberries and strawberries, for which a thorough wash post-harvest will be difficult to achieve without damaging the produce
- b) producers of leafy greens, salad fruit and/or vegetables:
 - i) commonly consumed raw, for example lettuce, micro leaves, baby leaves, watercress, spinach, herbs and cucumbers
 - ii) that have a short seed to harvest time meaning that they are likely to be harvested within two weeks of last irrigation. If irrigation water is contaminated, this contamination will not have had time to dissipate in short harvest crops
- c) producers of bulb and root vegetables, or vegetables with no protective skin, that are commonly consumed raw, for example salad onions, radishes and celery

Guidance

Animal Feed

Food Standards Agency (FSA)

[Animal feed Legislation](#)

[Animal Feed Guidance](#)

[Northern Ireland Feed Law Enforcement Guidancel](#)

[Pet Food Guidance](#)

[Farmers producing animal feed](#)

[Update on the microbiological survey of raw dog and cat food on retail sale in the UK](#)

National Trading Standards (NTS)

[National Agricultural Community Khub Library](#)

[ACTSO training slides on surplus food - June 2024](#)

[FINAL 2021 NCIP guidance for R12 and complex R7 v190321](#)

Advisory Committee on Animal Feedingstuffs (ACAF)

[Review of on-farm feeding practices](#) - recommendations on identifying hazards and minimising risks

Animal and Plant Health Agency (APHA)

[How food businesses must dispose of food and former foodstuffs](#)

Department for Environment, Food & Rural Affairs (Defra)

[Code of Practice for the Control of Salmonella DAERA](#) during the Production, Storage and Transport of Compound Feeds, Premixtures, Feed Materials and Feed Additives

British Standards Institution (BSI)

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

Food and Agriculture Organization of the United Nations (FAO) and International Feed Industry Federation (IFIF)

[Good Practices for the Feed Sector](#) implementing the [Codex Alimentarius Standards](#) Code of Practice on good animal feeding

Codes of Practice

[Guides to Good Practice](#) developed in accordance with Article 22 of [Regulation \(EC\) No 1831/2005](#) laying down requirements for feed hygiene

- [Community guide to good practice for the EU industrial compound feed and premixtures manufacturing sector for food-producing animals](#) (The European Feed Manufacturers' Federation - FEFAC)
- [Community guide to good practice for feed additive and premixture operators](#) (The Quality and Safety System for Speciality Feed Ingredients -FAMI-QS)
- [Guide to good practice for the manufacture of safe pet foods](#) (The European Pet Food Industry - FEDIAF)
- [European Guide to good practice for the industrial manufacture of safe feed materials](#)
 - [The manufacturing of safe feed materials from starch processing](#)
 - [The manufacturing of safe feed materials from oilseed crushing and vegetable oil refining](#)
 - [The manufacturing of safe feed materials from biodiesel processing](#)
 - Salmonella [auditor checklist](#) and [factsheet](#)
- [European Guide to Good Hygiene Practices for the collection, storage, trading and transport of cereals, oilseeds, protein crops, other plant products and products derived thereof](#)

[Guides to Good Practice](#) developed in accordance with Article 26 of [Regulation \(EC\) 767/2009](#) on the placing on the market and use of feed

- [EU Code of good labelling practice for compound feed for food producing animals \(FEFAC\)](#)
- [Code of Good Labelling Practice for Pet Food \(FEDIAF\)](#)

Agriculture and Horticulture Development Board (AHDB)

[AHDB Knowledge Library](#)

Industry Standards

Agricultural Industries Confederation (AIC)

[Feed Material Assurance Scheme Standards and Sector Notes](#) (FEMAS)

[Trade Assurance Scheme for Combinable Crops](#) (TASCC)

[Universal Feed Assurance Scheme](#) (UFAS)

[AIC Trade Assurance Checker](#)

[FEMAS Calculator](#) (gives guidance on analysis applicable to different feed materials)

Red Tractor

[Assured Food Standards](#)

[Red Tractor Assurance Checker](#)

The Northern Ireland Beef & Lamb Farm Quality Assurance Scheme

[The Product Standard and Rules of the Northern Ireland Beef and Lamb Farm Quality Assurance Scheme](#)

Imported Feed

Food Standards Agency (FSA)

[Importing high risk food and feed of non-animal origin into GB](#)

[Importing live animals, animal products and high-risk food and feed of non-animal origin from non-EU countries to Great Britain](#)

[Third country representation for animal feed businesses](#)

Association of Chief Trading Standards Officers (ACTSO)

[Sharing information and intelligence to support delivery of imported feed controls](#)

Animal and Plant Health Agency (APHA)

[APHA Home Page](#)

[Animals, animal products and HRFNAO imports: authorised border control posts in the UK](#)

[Supplying and using animal by-products as farm animal feed](#)

Food Hygiene Primary Production

Food Standards Agency (FSA)

[Primary production food hygiene inspection guidance](#)

Links to information sources that may assist the identification of primary producers in your area

[British growers association](#)

[Pick your own farms](#)



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