

DELIVERY OF OFFICIAL CONTROLS FOR ANIMAL FEED

Report by Maria Jennings, Director for Regulatory Compliance, People and Northern Ireland

For further information contact Mark Davis: Tel 07919 395613

Email: mark.davis@foodstandards.gov.uk

1. Summary

1.1 Animal feed controls were not prioritised in the initial phases of the Regulating Our Future (ROF) Programme, recognising that significant work has been carried out in recent years to modernise them. This paper describes the importance of animal feed controls, the current arrangements for the delivery of the controls in England, Wales and Northern Ireland (NI) and planned next steps for improvement.

1.2 The Board is asked to:

- **Endorse** the risk-based approach being taken to deliver animal feed controls.
- **Agree** that there should be an assessment of the current arrangements with subsequent actions to ensure feed controls are aligned as far as possible with ROF principles and desired public health outcomes.

2. Background and Overview of Modernised Feed Controls Animal Feed in the UK

2.1 The animal feed sector involves a complex matrix of feed materials, merchants, importers, compounders and hauliers; feed additives also play an important role in modern agriculture. It is also worth noting that every year in the UK, around 660,000 tonnes of former foodstuffs are processed as animal feed¹.

2.2 The UK exports £1.4 billion and imports £2.2 billion worth of animal feed each year. It is therefore imperative that UK consumers, and the UK's trading partners, are assured that UK official controls for animal feed production and imports are robust, with the need for assurance being heightened as the UK prepares to leave the EU.

3. The Risks Associated with Animal Feed

3.1 Breakdowns in feed controls have historically resulted in major incidents, including the foot and mouth outbreak in 2001 (costing the UK economy over £8 billion² and the slaughter of 6m affected animals) and the BSE crisis (3.3

¹ Source: WRAP <http://www.wrap.org.uk/content/using-surplus-food-animal-feed>

² <https://www.nao.org.uk/report/the-2001-outbreak-of-foot-and-mouth-disease/>

million cattle slaughtered with an estimated cost to the economy of £3.7 billion). The latter incident ultimately led to the creation of the FSA to provide independent oversight of official controls for food and feed that safeguard public health.

- 3.2 Feed incidents reported to the FSA 2013 to 2016 showed that microbiological contamination of imported feed and feed materials were the most prevalent, with Salmonella species occurring across a number of products. Incidents relating to feed additives were the second most reported and other categories of feed incident were at relatively lower levels. More recently, there has been a marked increase in the number of reported incidents connected with raw pet foods, reflecting a significant market growth in this sector. The Advisory Committee on Animal Feedstuffs (ACAF) has been actively considering the risk associated with raw pet food and appropriate controls, including development of guidance for raw pet food manufacturers. Defra and Public Health England have also been engaged with the FSA on the issue.
- 3.3 These incidents demonstrate the risk associated with animal feed, the potential impact on the food chain and the importance of feed businesses owning their responsibility for safe feed production/supply. It is therefore critical that the FSA establishes and maintains a sustainable and effective official feed controls regime that is responsive to new challenges.

4. Historical Perspective on Official Controls for Animal Feed

- 4.1 Audits of the delivery of official feed controls in the UK undertaken by the Food and Veterinary Office (FVO) of the European Commission (EC) in 2009 and 2011, and FSA audits of local authority (LA) delivered feed controls, highlighted significant concerns. LA data on feed controls at that time showed a continuing decline in LA delivery and FVO auditors questioned the sustainability of the delivery system. The key failings identified by the FVO and FSA audits included:

- Poor quality of controls (E&W);
- Weak imported and inland feed controls (E, W, NI);
- Poor or variable HACCP based inspections (E, W, NI);
- Poorly targeted sampling programmes (E, W, NI);
- Poor follow-up on non-compliant businesses (E, W, NI);
- Low priority given to feed controls by LAs (E&W); and
- Poor quality data on delivery of feed controls being provided to the FSA by LAs (E&W).

5. Overview of the Current Feed Controls Delivery Arrangements in England, Wales And NI

- 5.1 Feed official controls are delivered by LAs in England and Wales, on behalf of the FSA, and by the Department of Agriculture, Environment and Rural Affairs

(DAERA) in NI, which is an enforcement authority in its own right. The delivery models differ to exploit opportunities arising from arrangements for the delivery of other regulatory controls in the three countries; for example, the on-farm presence of other delivery bodies to conduct animal health checks. It is also desirable to take advantage of the available animal feed expertise and existing geographical delivery infrastructure that can be provided by other bodies, such as National Trading Standards (NTS) for the 147 local feed authorities in the England delivery model, DAERA for delivery in NI and the consistent unitary structure of LAs throughout Wales.

- 5.2 Whilst the delivery models differ in some respects, they are underpinned by a common framework across the three countries (see Annex 1) and there is sharing of information to support consistency. For example, the risk based National Enforcement Priorities³ (NEPs) which are developed each year by the FSA in association with NTS, LAs and laboratories are common to all three countries. Similarly, the FSA commissioned Feed Threat Assessment underpins the annual NEPs by identifying emerging risks to animal feed. This allows the FSA to communicate to feed authorities across the 3 countries a consistent, intelligence-led and risk-based approach to the delivery of official controls, thereby maximising the impact of available resource.

6. Delivery Model in England

- 6.1 Following the adverse FVO audits a formal and in-depth review of animal feed controls was undertaken in 2012, which led to the following improvements being made in line with principles agreed with the FSA Board:
- A revised Feed Law Code of Practice (FeLCoP) and Practice Guidance;
 - Inspection frequencies taking account of a feed businesses compliance history;
 - FSA approval of Red Tractor and Agricultural Industries Confederation (AIC) assurance schemes to provide earned recognition and a reduced frequency of official controls for scheme members (see Annex 2);
 - Improvement of FSA feed training materials to support LA officer technical knowledge;
 - Dedicated FSA funding (approximately £3m per year at that time – now £2.1m) for LA feed controls, utilising FSA funds previously allocated to LAs via the Revenue Support Grant; and
 - The co-ordination of LA official feed controls by NTS through a Memorandum of Understanding.
- 6.2 This improvement initiative has introduced a delivery partnership that ensures the timely, proportionate and consistent delivery of feed controls in line with a planned annual programme. The programme is fully costed to deliver

³ <https://www.food.gov.uk/business-guidance/national-enforcement-priorities-for-animal-feed-and-food-hygiene>

inspections, point of entry checks on imports, sampling and on-farm food hygiene primary production controls. The utilisation of a data modelling tool ensures a risk-based approach to prioritisation of controls that deliver value for money through robust cost benefit analysis.

6.3 A FVO follow-up audit of feed official controls in 2014 reported significant improvements in terms of the new delivery arrangements and specifically acknowledged the positive impact of the targeted funding on ensuring effective LA delivery. A detailed description of the structure and operation of the new feed model arrangements introduced in 2014 is available⁴. In summary the improved and embedded England feed controls delivery arrangements with NTS include:

- The NTS Feed Delivery Programme Manager taking responsibility for the day-to-day planning, monitoring and co-ordination of the regional feed delivery programme (including improvement projects that have been agreed with the FSA – see Annex 3);
- The utilisation of a desk top modelling approach, jointly developed by the FSA and NTS to ensure a risk-based approach to prioritisation of official controls, the outcome of the exercise is an agreed inspection plan - see Annex 4;
- The deployment of operational expert Regional Feed Leads, whose role is to ensure that all LAs are delivering feed controls effectively by providing regional oversight of delivery against funding, reporting of control activity to NTS for onward reporting to the FSA, promoting regional consistency and competency for delivery and providing regional technical support.

6.4 An FSA assessment of the revised feed controls in 2016 identified scope for further specific improvements but found that the commissioning of NTS to deliver a regionally co-ordinated approach and governance arrangements for the delivery of feed controls was sound, providing value for money in the England context. Improvement recommendations continue to be addressed through the Four-Year Animal Feed Strategy for England feed controls (see Annex 5). Changes introduced into the FeLCoP (England) in 2014 and 2018 reflect ROF principles and these have had positive impacts including a reduction in overall official controls cost to the FSA and increased focus of inspection activity for riskier feed businesses and activities – see Annex 6.

⁴ <https://www.food.gov.uk/sites/default/files/media/document/deliverymodel.pdf>

"The work of NTS and FSA has seen significant improvement in feed delivery over the course of the last 6 years of our relationship. The benefits of the consistent support of the system, through national and regional coordination, have supported the development and improvement of official controls and shaped an effective, transparent and value for money programme. The effectiveness of this system is why we have seen engagement in feed move from 40% before the partnership, to 99% of feed authorities in England involved in the 19/20 programme".

Mark Pullin – NTS Strategic Lead for Animal Feed

6.5 The improved controls to ensure effective risk-based targeting of inspections are having the desired effect and have contributed towards increasing business compliance - see Annex 7. Further work is necessary to improve the reporting of inspection data and initiatives are underway to address this – such as the pilot scheme with NTS, in collaboration with two trading standards regions, to collect more detailed data on the nature of feed business non-compliance.

6.6 To further improve the overall efficiency of official controls delivery and to reduce footfall on farms, hygiene controls for crops at primary production are also funded and carried out through the NTS/FSA delivery arrangement.

7. Delivery model in Wales

7.1 In 2014 an FSA report on Food and Feed Law Enforcement in Wales to the Minister of Health and Social Services detailed serious shortcomings in the delivery of official feed controls by local authorities. The problems included lack of confidence in the authorities' feed establishments databases, inaccurate risk ratings and a failure to quantify and deliver the number of programmed interventions required. It was agreed with Welsh Government that £490k be removed from the LA Revenue Support Grant to be made available to the FSA to secure urgent targeted improvements in feed control delivery.

7.2 In April 2015 a new feed law enforcement service, developed collaboratively by the FSA and the Directors of Public Protection in Wales was introduced. A Governance Group (including Welsh LGA, Directors of Public Protection Wales, FSA, Chairs of regional feed leads groups (LAs), Wales National Coordination for TS, Wales Heads of TS) was established to oversee feed controls delivery, which has the following stated aims:

- Agree the process to facilitate the operational working necessary to deliver the agreed programme of work;
- Management and monitoring of feed delivery;
- Provide assurance that the key objectives are being met and that the regions are proceeding in accordance with their work plan;

- Ensure that the programme is on track to deliver;
 - Monitor financial performance to ensure targets are met;
 - Identify any required changes and implement these to ensure the delivery of activities;
 - Consider future developments and feedback on progress made.
- 7.3 A regional, risk-based inspection programme for Wales was introduced and LAs in Wales work in partnership across six feed regions, supported by a regional feed officer, to deliver feed inspections on a regional basis. The FSA devises an annual programme of inspections based on information submitted by local authorities via a desktop modelling exercise that reflects the process in England. Inspections are planned according to establishment risk ratings and the official resource available. The FSA routinely monitors quarterly returns submitted by LA lead feed officers and allocates funding on a quarterly basis.
- 7.4 The current risk-rating regime for feed establishments is set out in the Wales FeLCoP which was last updated in October 2014 and does not reflect the updated risk rating provisions in England and NI. A review of feed controls in Wales is planned for 2019/20 after which the Code will be updated to align with the FeLCoP for England and guidance in NI as appropriate.
- 7.5 This model provides ongoing support for the delivery of the inspection programme and guarantees that funding reaches front-line services, helping to ensure protection of the food chain and that the necessary level of assurance is provided to consumers, industry and government.
- 7.6 The Welsh Food Advisory Committee considered the issue of animal feed controls at their April 2019 meeting and a summary of their discussion is at Annex 8.

8. Delivery Model in Northern Ireland

- 8.1 In Northern Ireland official feed controls are delivered on a regional basis by the Department of Agriculture, Environment and Rural Affairs (DAERA), an enforcement authority in its own right. DAERA funds feed official controls through its own budget and has responsibility for all feed controls including those relating to medicated feed and TSE controls, which in England and Wales are covered by the Veterinary Medicines Directorate and Animal and Plant Health Agency respectively.
- 8.2 It is not appropriate to have a FeLCoP for delivery of feed controls by DAERA as it is an enforcement authority in its own right and consequently the FSA produces the Feed Law Enforcement Guidance Document (Northern Ireland), which is a consolidation of the requirements within the FeLCoP and Practice Guidance in England. Because DAERA is a government department it is not obliged to take account of the guidance but has agreed to do so in principle and in practice this is the case. The guidance includes recognition of the role of assurance schemes within the feed industry to reduce the burden of

inspections and better target feed controls. It incorporates risk-based inspection frequencies taking account of compliance history and a reduced frequency of official controls for compliant members of FSA approved assurance schemes, these reflect the provisions of the England FeLCoP apart from the arrangements for the inspection of low risk farms undertaking primary production of feed. As the enforcement authority DAERA can increase the frequency of inspection based on local information, this reflects the arrangements in England and Wales.

- 8.3 DAERA also takes account of the NI feed industry's Food Fortress Scheme (see Annex 9) in developing its feed sampling plan.
- 8.4 Whilst the FSA does not fund feed official controls in NI it provides support to DAERA through the provision of training for DAERA inspectors and funding of additional feed surveillance (£21k in 2018/19), focussed on imported feed materials and based on FSA's NEPs. The additional funding recognises that the agriculture and food processing sectors in Northern Ireland are a significant element of the local economy, collectively accounting for around 70,000 local jobs. For comparison, agriculture as percentage of total Gross Value Added is 1.4% for NI compared to 0.5% for the UK.
- 8.5 The Northern Ireland Food Advisory Committee considered the issue of animal feed controls at their March 2019 meeting and a summary of their discussion is at Annex 10.

9. Alignment of Animal Feed Official Controls Delivery with ROF Principles

- 9.1 The approach taken to modernising feed controls in recent years already addresses the following ROF principles:

FSA and regulatory partners' decisions should be tailored, proportionate and based on a clear picture of UK food businesses

- The regional structuring of feed controls delivery in the three countries allows regional experts to input their localised knowledge so that official controls are tailored to regional needs.
- Expert practitioners on an inland agricultural panel, and separate ports panel, (with input from England, Wales and NI) provide specialist input to ensure that regulatory interventions are tailored to the needs of different feed activities.
- A range of stakeholders contribute to the FSA commissioned animal feed risk assessment that is compiled by NTS and underpins the annual setting of risk-based NEPs for animal feed controls across England, Wales and NI.

The regulator should take into account all available sources of information

- The delivery models in all three countries take account of the additional assurance provided through feed business membership of a recognised assurance scheme, which informs the frequency and nature of official feed controls required. An FVO fact finding mission to the UK in January 2016, focusing on the interaction between private sector assurance schemes and official controls for feed, reported⁵ positively on the approach introduced in England, saying that “*The arrangements in place provide a solid basis for advanced level of interactions with feed official controls*”. Areas of good practice were cited and subsequently shared with other EU member states; FSA animal feed earned recognition arrangements were used as an exemplar in UK-led CODEX discussions on the development of guidance for the use of voluntary third-party assurance to inform official controls.
- High-level summary data on Feed Business Operators’ (FeBOs) non-compliance with feed law requirements is received by the FSA on a quarterly basis from the approved animal feed assurance schemes, this enables the FSA to explore the trends in non-compliance and how this data stream can help to inform the Feed Threat Assessment and NEPs.
- FSA, DAERA in NI and LA feed teams in England liaise with LA food authorities to obtain information on businesses placing surplus food into the feed chain; this facilitates the inspection of waste food suppliers for animal feed production and in Wales unitary LAs achieve this by delivering both feed and food official controls.

Businesses doing the right thing for consumers should be recognised; action will be taken against those that do not

- The risk-based feed controls regimes in the three countries take account of a FeBOs previous record of compliance to inform the frequency of official controls, which in turn allows the focusing of resource on non-compliant FeBOs.
- The improved official feed controls delivery arrangements have resulted in a shift of resource away from lower risk/compliant businesses towards higher risk/non-compliant business (see Annex 6).
- An element of the FSA funding for feed official controls has been allocated to carry out follow-up visits to verify corrective action in non-compliant

⁵ http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3634

businesses, this is again in line with the ROF principle that official intervention be focused on the least compliant businesses.

10. EU Exit Considerations

- 10.1 Whilst there are variations in the feed delivery models in England, Wales and Northern Ireland, there is a consistent underpinning controls framework supported by a common approach to risk identification. The arrangements are accepted by the EU and other feed trade partners as demonstrating effective control and we anticipate this status will be maintained when we leave the EU.
- 10.2 EU Exit without a deal has the potential to impact on feed imports and exports and FSA officials are working with colleagues across Government to put in place arrangements to minimise trade disruption for this scenario. The FSA's arrangements to provide the required level of scientific support and risk assessment capability for official feed controls after EU Exit are also under consideration, including the potential need for a Risk Management Committee on animal feed, in addition to the proposed risk assessment role envisaged for the Scientific Advisory Committees.

11. Next Steps for Improvement

- 11.1 We will seek to further align the feed delivery models across the three countries with ROF principles by improving access to relevant data and its subsequent use. This will include:
- Continued collaboration with the FSA's Strategic Surveillance Programme to develop a risky feed imports dashboard that draws in data on reported imported feed incidents from numerous international databases. The dashboard will carry out detailed analysis and provide richer risk information around specific feed product manufacturers, product, importers, country of origin and ports of entry. This will further enhance our annual National Enforcement Priorities and the Feed Threat Assessment.
 - Using the developing "Unified View" of food and feed businesses to provide enhanced information on feed businesses – the aim is to collect data that will allow the demonstration of aggregate statistics at a national level, not just feed establishment level. This will provide an improved insight to feed business risk on a regional and LA area basis, allowing improved risk targeted official controls.
 - Incorporating the reporting of feed official controls into FSA's future arrangements for capturing data on official control delivery information where arrangements are less well-developed than for food hygiene data.

- Incorporating delivery of feed official controls into the “balanced scorecard for LA delivery’ which will be used to report on and manage the performance of official control delivery partners.
- Explore the potential for use of the FSA official controls “risk-engine” to facilitate access and analysis of diverse data that will inform the risk rating of animal feed businesses

11.2 Following the significant improvements made in recent years in establishing a robust framework for the delivery of official feed controls, it is now timely to assess the impact of those controls on business compliance and animal and public health outcomes. We will therefore be undertaking work across the FSA to identify suitable indicators and outcome measures that will be used to drive further improvements in performance of the delivery of controls across the three countries and the level of compliance by FeBOs.

11.3 Additionally, there are plans to carry out an in-depth review of the new feed delivery model in Wales, paralleling that carried out in 2016 of the model in England, and findings will be reported at the end of the summer.

12. Conclusions and Recommendations

12.1 Effective and risk focused animal feed controls provide a foundation that ensures that the whole food chain remains safe, so that consumers are protected and the status of the UK’s international food and feed trade is maintained.

12.2 The Board is asked to:

- **Endorse** the risk-based approach being taken to deliver animal feed controls.
- **Agree** that there should be an assessment of the current arrangements with subsequent actions to ensure feed controls are aligned as far as possible with ROF principles and desired public health outcomes.

Annex 1: Summary of the Common, and Country Specific, Elements of Delivery Across the Three Countries

While there is a diversity of approach for some elements of the delivery models to meet country specific needs and efficient use of existing delivery structures, strong common elements in the models of all three countries embrace ROF principles.

		England	Wales	Northern Ireland
Common delivery model elements		Animal Feed Risk Assessment		
		National Enforcement Priorities		
		Regionally structured delivery arrangements		
		Earned Recognition for compliant businesses		
		Earned Recognition for assurance scheme membership		
		National Agricultural Panel member		
		National Animal Feeds at Ports Panel member		
Country specific delivery model elements	Delivery body(ies)	147 Local authorities	22 Local authorities	DAERA
	Oversight of delivery body(ies) performance	National Trading Standards under MoU with FSA	FSA in Wales	FSA in NI
	Codification of official controls	England FeLCoP	Wales FeLCoP	Feed Law Enforcement Guidance Document (Northern Ireland)
	Funding of controls and allocation	FSA funding distributed by NTS following quarterly FSA release	FSA funding direct to LAs on quarterly FSA release (original allocation from RSG)	DAERA self-funded
	Governance arrangements	FSA/NTS Governance body	FSA and Directors of Public Protection in Wales Governance Group	DAERA is the animal feed CA – formal governance arrangements not required.

Notes:

- The National Agriculture Panel (NAP) - an expert panel of officers from England, Wales and NI with significant knowledge and experience in animal feed enforcement, plus FSA representatives, Public/Agricultural Analysts, Veterinary Medicines Directorate (VMD), Animal and Plant Health Agency (APHA) and Chartered Trading Standards Institute (CTSI).
- The National Animal Feeds at Ports Panel (NAFPP) - provides additional specific expertise in animal feed enforcement at feed imports points of entry.

Annex 2: FSA Earned Recognition Arrangements

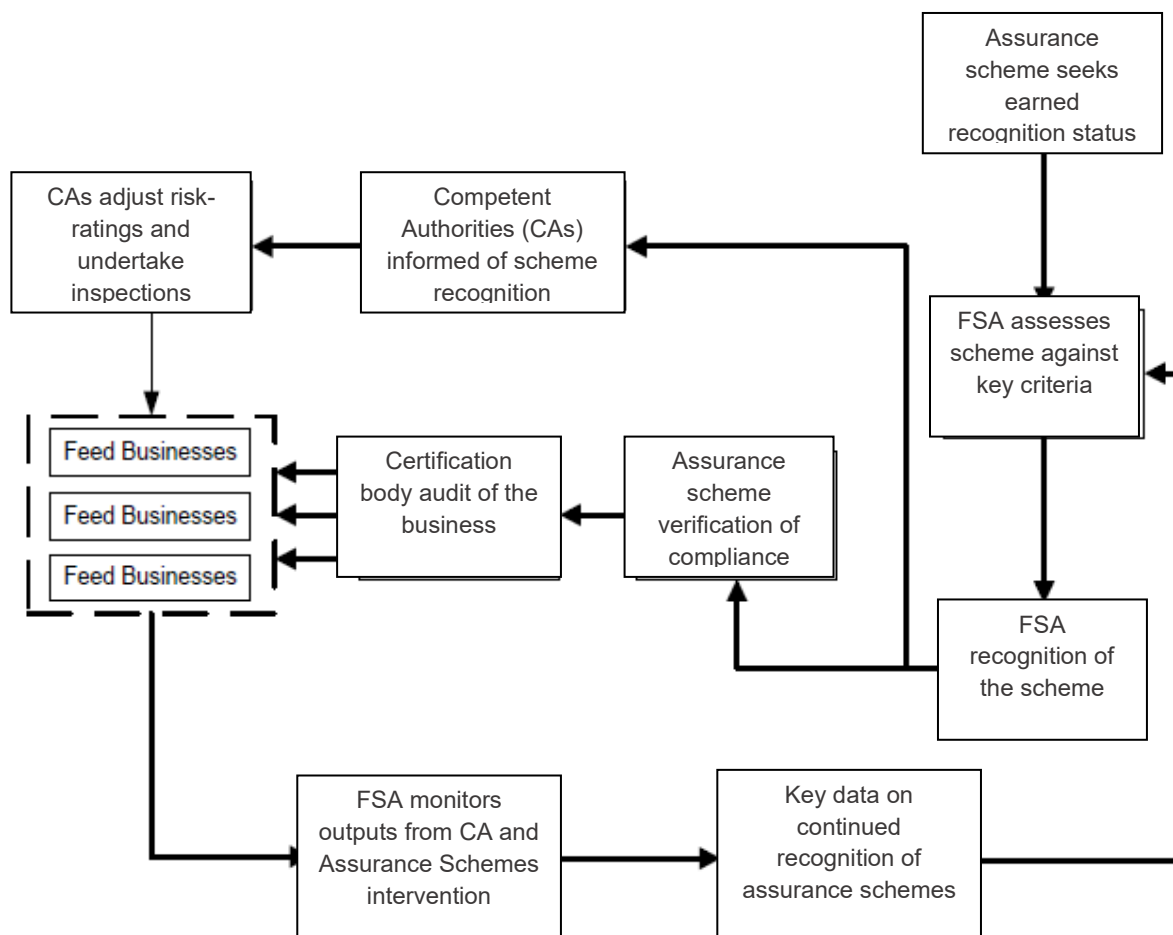


Figure 1 Schematic representation of recognition of assurance schemes

Description of underpinning recognition arrangements:

- In line with ROF principles the FSA makes use of the data arising from the activities of recognised private assurance entities to inform our regulatory approach using the concept of ‘Earned Recognition’. Under this approach, business operators who demonstrably maintain high standards of compliance with feed law benefit from reduced official controls. This aims to reduce the burden on compliant feed businesses whilst concentrating enforcement activity at those businesses which are less compliant and higher risk.
- This approach is based on the principle of identifying alternative forms of assurance to deliver an intelligence led approach to delivering official controls. Information from assurance schemes approved by the FSA informs, rather than replaces official controls.
- The application of Earned Recognition in the feed sector has been by the far the most significant, with all stages of the feed chain eligible to have Earned Recognition applied, and this has been reflected in the approach to risk-rating in Feed Law Codes of Practice in England and Wales and the guidance document in Northern Ireland.

- Private organisations wishing to seek FSA approval for their assurance scheme must meet an established set of criteria to demonstrate the robustness and independence of the scheme. The criteria include being able to demonstrate that the assurance scheme assessments consider all aspects of the legislative requirements relevant to the feed business concerned. We also specify that certification bodies must be UKAS accredited or equivalent (ISO 17065 accreditation).
- The FSA has approved a number of schemes for the various stages of feed production/use, including those covered by Red Tractor Assurance (on-farm activities) and the Agricultural Industries Confederation (all other aspects of feed production) and specifically in Wales the Welsh Lamb and Beef Producers (WLBP) and in Northern Ireland the Northern Ireland Beef & Lamb Farm Quality Assurance Scheme
- FSA approval is formalised through a Memorandum of Understanding between the FSA and the owner of the assurance scheme. The signed MoUs are published on the Agency's website. Feed businesses receive an assessment from a certification body at least every year or 18 months, depending on the type of operation.
- The degree to which the frequency of official controls is reduced is dependent upon the inherent risk of the operation, with higher risk businesses, such as manufacturers, attracting less of a reduction than those considered to be lower risk. Importantly, businesses that are a member of an FSA approved assurance scheme must also be assessed by their enforcement authority as achieving a satisfactory level of compliance to receive 'earned recognition'. If not, the frequency of official controls will not be reduced. Irrespective of membership of an Agency approved assurance scheme, LAs still retain the right to visit any feed business in their area where local intelligence suggests it is appropriate to do so.
- The Agency receives quarterly data from the scheme owners to highlight the type and frequency of any non-conformances identified. We also receive management information on supervisory audits carried out to ensure the effectiveness and consistency of the assurance scheme assessments.
- Data on non-conformances is shared with local authorities and used to inform consideration of any areas of business activity requiring specific attention, for example focused intervention or targeted guidance. The MoUs with the assurance scheme owner also require that the Agency be informed immediately should anything be identified that represents a serious risk to public or animal health. We keep the approved schemes under review, including a formal annual review process, to ensure fitness for purpose.
- The MoU we have with the approved assurance schemes also provides for regular exchange of data on membership status updates, issues identified by scheme assessments and assessor training and supervision.

Annex 3 Examples of improvement projects delivered in England through the FSA/NTS partnership

FSA funding of feed controls delivery includes the provision for delivery of projects to improve consistency and quality of the controls. Some examples include:

- National guidance to support LAs in maintaining and reporting accurate feed premises data and to ensure all relevant feed premises are included in LA interventions programmes. Guidance also promotes consistent application of the FeLCoP risk rating system for feed businesses, supporting the FSA/NTS Desktop Modelling process and effective allocation of risk-based funding.
- Delivery of training events, reaching over 240 feed officers in England to support consistent implementation of:
 - the national guidance on establishment database accuracy
 - earned recognition
 - the FeLCoP animal feed risk rating system
 - the NEPs
 - changes to the FeLCoP which came into effect in April 2018
- Update of model forms for intervention and enforcement, supporting effective and consistent delivery of feed hygiene official controls. The revised forms:
 - reflect changes in legislation and guidance
 - build on use and experience of the forms since their initial inception in 2014
 - improve formatting to facilitate identification and reporting of the nature and trends in non-compliance in line with the regional pilot programmes
- Interactive e-books of the FeLCoP and Guidance in England. Produced by Trading Standards South West Region (TSSW) and more efficient to use, allowing navigation between sections in the Code and Practice Guidance, with links to model forms and other websites. A resource wide search facility is included and interaction with eLearning modules developed by TSSW for import controls, primary production and feed sampling.
- Development of a National Inspection Programme for food and non-food businesses sending co-products⁶ for use in animal feed which includes:
 - guidance on identification, registration, inspection/audit and risk rating
 - template inspection/audit and data capture forms to ensure a consistent and effective approach allowing quantitative and qualitative assessment by LAs
- The development of guidance on LA use of officers with qualifications, skills and competency gained within the environmental health framework to deliver feed hygiene controls in line with the FeLCoP flexibilities.
- Support for a trial by Trading Standards South East region to explore the shared use of resource to work across LA boundaries to deliver feed official controls.

⁶ Co-products for inclusion in animal feeds arise as surplus by products from processes such as oilseed crushing, wheat milling, sugar extraction and beer production

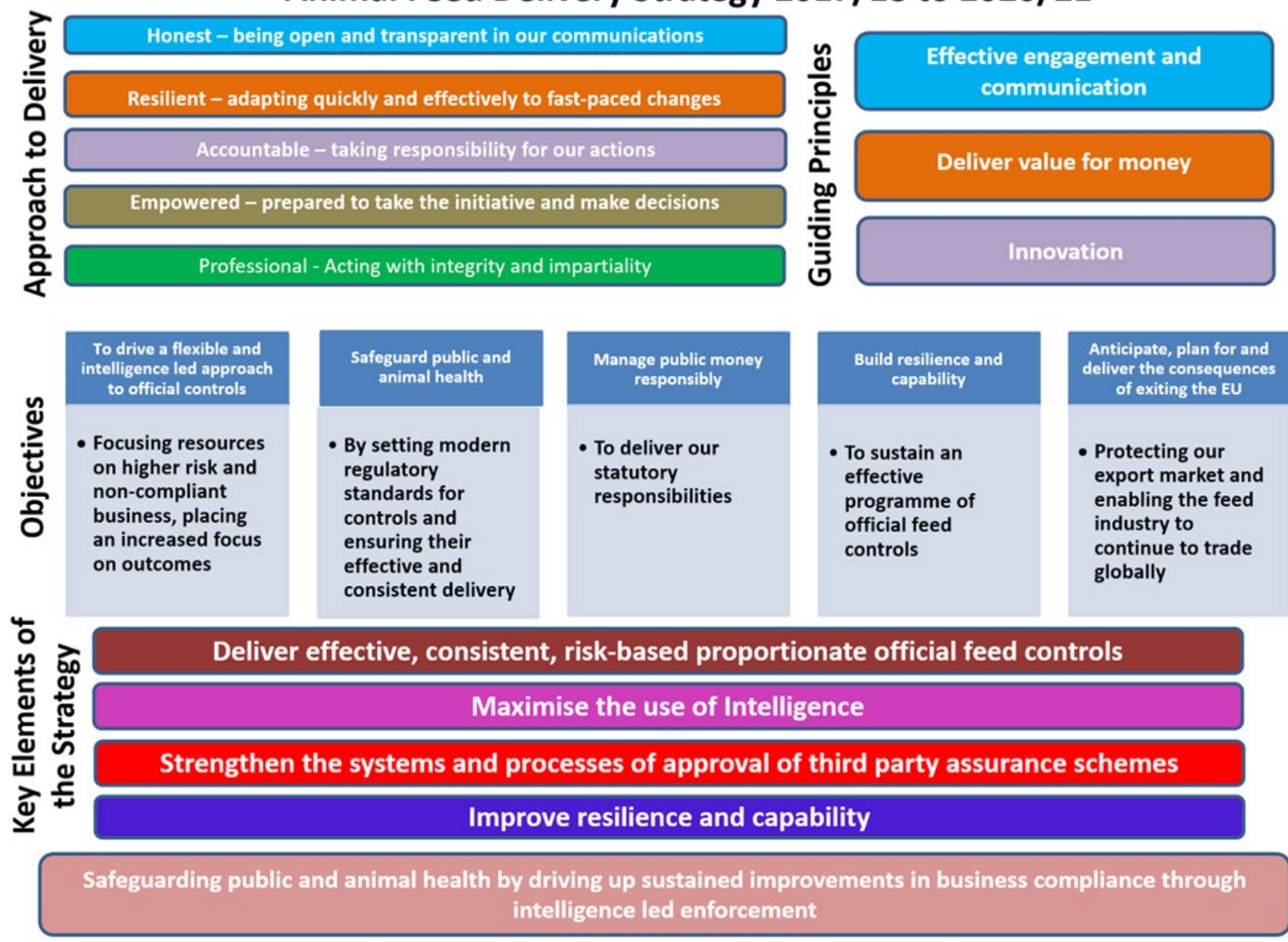
Annex 4: Outcomes from 2019-20 NTS/LAs Desktop Assessment and Planned Inspections - England

Number of establishments by level of compliance									
Establishment type	Poor	Varying	Satisfactory	Broad or better	Member of AAS	Not previously visited AAS	Not previously visited	Total establishments	Planned inspections
Manufacturer	2	16	79	124	272	16	39	548	155
Co-product producer	5	67	296	742	156	5	163	1434	448
Mobile mixer	0	0	9	15	14	1	2	41	9
Importer	2	5	33	36	23	1	18	118	34
Feed store	0	18	136	178	215	93	190	830	101
Distributor	12	26	337	766	134	52	585	1912	244
Transporter	3	7	175	375	492	209	380	1641	150
On farm mixer	11	100	954	990	4379	2213	1329	9976	651
Pet food manufacture	15	28	119	163	49	4	178	556	210
Supplier of feed material/ surplus food	15	157	1401	2469	165	56	1610	5873	835
Livestock farm	91	381	6234	11817	9368	10765	60254	98910	742
Arable farm	4	49	644	850	2615	5077	6872	16111	107
Higher risk primary food products	1	10	75	289	65	180	295	915	203
TOTALS	161	864	10492	18814	17947	18672	71915	138865	

Note: AAS = Approved Assurance Scheme

Annex 5 The Four-Year Animal Feed Strategy in England

Animal Feed Delivery Strategy 2017/18 to 2020/21



Annex 6 Impact of 2018 Changes to England FeLCoP

New Code lower risk businesses account for 84% of premises **but** 22% of costs

New Code higher risk businesses account for 16% of premises **but** 78% of costs

Old Code higher risk businesses account for 52% of costs and lower risk 48% of costs

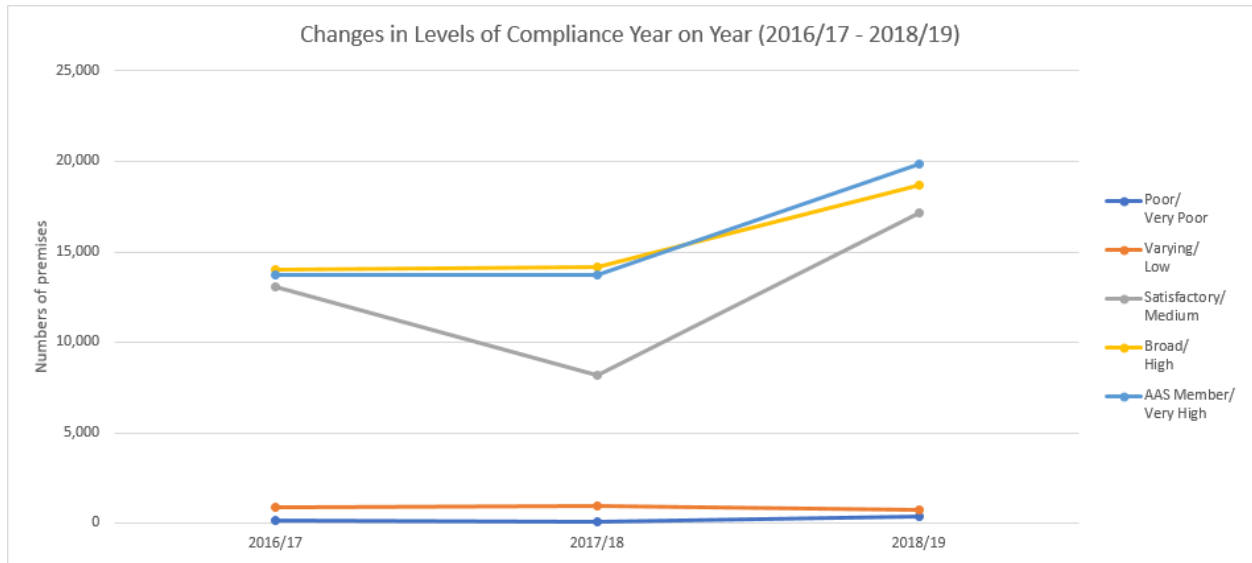
New Code required **delivery aligned to the £2.1m funding**

Impact of ROF Principle Changes to the New Code of Practice (April 2018) on Costs and Inspections						
Criteria	2018/19 New Code April 2018	% Total Cost	2017/18 Old Code May 2014 Required Funding	% Total Cost	2017/18 Delivery actual funding Old Code	% Total Cost
Total Cost	£1,039,612		£4,517,443		£1,220,710	
Number of Inspections	3,910		21,368		5,395	
Number of Premises	144,221		142,598		142,704	
Inspections Higher Risk Activities	£810,873	78%	£760,584	20%	£637,932	52%
Inspections Lower Risk Activities	£ 228, 739	22%	£3,756,859	80%	£582,778	48%

Under the **new code**, resources are focused on **higher-risk establishments** by applying ROF Principles

ROF benefits realised through significant **changes to the animal feed law risk-rating scheme** in April 2018

Annex 7 Year on year Comparison of Establishment Numbers by Compliance Category in England



Annex 8 Summary of Welsh Food Advisory Committee Discussion

Welsh Food Advisory Committee: Themed Discussion
Date of Meeting: 11/04/2019. Theme: Official Feed Controls
Attendance
WFAC Members: Dr R Hussey, Mr D Peace, Dr N Barry, Mr J Wilson, Dr P Hollington, Mr A Gardner
FSA Officials: Julie Pierce, Alice Teague, Lucy Edwards, Becky Jones, Daniel Morrelli
External presenters: Jacqui Thomas, Joint Chair of the Wales Regional Feed Group & Lead officer for Mid-West Wales and Gareth Walters, Wales Heads of Trading Standards (WHOTS) Strategic Lead for Feed
Stakeholders: Representatives from Welsh Lamb and Beef Products, Agricultural Industries Confederation, representatives from local authorities in Wales (including Powys, Monmouthshire, Rhondda Cynon Taff and Newport)
Presentations
Becky Jones: Overview of Official Feed Controls in Wales which covered the importance of feed, controls and delivery in Wales and performance and key achievements. The presentation also highlighted the opportunities and challenges faced in future and the governance arrangements in place.
Jacqui Thomas: Overview of regional delivery and the role of the regional lead feed officers.
Gareth Walters: Overview of the Animal Feed Governance Group.
General Comments/Observations
The presentations were very informative. The Committee identified potential areas for improvement in relation to administration arrangements and the need for collaboration across sectors; taking a more unified approach with other agencies i.e. Defra, APHA. There were opportunities to improve administrative data and information sharing, using the surveillance methods that the FSA had developed, and the team was encouraged to seek input from those in the FSA familiar with the new uses of data.
The Committee heard that Assurance schemes were able to work collaboratively with the inspection process and felt there was opportunity for the FSA to build on this relationship as part of the wider Regulating Our Future approach to get the best results from this work.
Country Specific Comments
It was evident that there had been substantial change in the organisation and delivery of Official Feed Controls in Wales since 2015, when the funding transferred to FSA Wales.

The committee welcomed the review of Official Feed Controls in Wales planned for this summer to consider how the model was working. WFAC advised drawing from experience and the different models across the UK. WFAC noted the review focus on future budget requirement and use of that budget and encouraged consideration of the impact of the model in terms of outcomes. The review is an opportunity to look at the system in its entirety to ensure that the FSA continually challenges ways of working, in line with Regulating Our Future.

Actions for Secretariat

No actions arose from the discussion for staff to take forward.

Annex 9: Summary of “Food Fortress” Arrangements in Northern Ireland

Food Fortress is a collaboration between Queen’s University Belfast’s Institute for Global Food Security and the Northern Ireland Grain Trade Association (NIGTA) with funding support from Invest Northern Ireland.

This collaboration seeks to better protect the integrity of the feed/food supply chain locally. It provides an overarching assurance structure for safe animal feed production through implementation of a risk-based sampling and testing scheme for feed ingredients across the industry, including both importers and feed compounders. The testing regime focuses on four key undesirable substance categories - dioxin, mycotoxins, heavy metals and pesticides.

An information sharing protocol is in place between Food Fortress, DAERA and FSA. This outlines the agreed information exchange arrangements. Food Fortress gives DAERA and FSA access to regularly updated anonymised results via the Food Fortress website. <http://www.foodfortress.co.uk/>

Participating members of Food Fortress are responsible for notifying DAERA of results not in compliance with statutory limits. Wherein this is not provided voluntarily by relevant businesses party to a non-compliant Food Fortress composite sample, Food Fortress management will furnish FSA and DAERA with the details of any such businesses to enable full statutory investigation.

Professor Chris Elliot recently said that “Northern Ireland’s feed businesses have the world’s leading programme for management of risk to the feed and food chain and the Food Fortress network is the envy of every other region”

**Annex 10: Summary of Northern Ireland Food Advisory Committee
Discussion**

Northern Ireland Food Advisory Committee: Themed Discussion
Date of Meeting: 6 March 2019. Theme: Animal Feed
Attendance
NIFAC Members: Colm McKenna (Chair), Elizabeth Mitchell, Aodhan O'Donnell, Phelim O'Neill, Sara McCracken, Fiona Hanna, Lorraine Crawford. FSA Officials: Roberta Ferson, Ruth Moreno, Elvira Perez, Seth Chanas, Gerard Smyth Stakeholders: Robin Irvine (President of the Northern Ireland Grain Trade Association (NIGTA)), Stephen Nixon (DAERA Agri-Food Inspection Branch (AfIB))
Presentations
Gerard Smyth, FSA in NI Senior Adviser in Primary Production: Background on the differences between the Northern Ireland system and that in England and Wales; the role of AfIB; Cross Border Engagement; and the impact of feed incidents. Stephen Nixon, DAERA AfIB: An outline of the significance to the NI economy of the feed sector; feed auditing, inspection, sampling and analysis; earned recognition schemes; the development of a new feed inspection system and database; and incident handling. Robin Irvine, President of NIGTA: An outline of the feed trade; production of ruminant, pig and poultry feed; investment in mills, research and technology; quality schemes; the Going for Growth plan for the NI agri-food industry; the importance of sustainability; precision farming and the reduction of impacts on air and water quality; sampling priorities; imports; working with regulators; and the Food Fortress scheme.
General Comments/Observations
NIFAC noted that the delivery model for feed was modernised prior to the Regulating Our Future (ROF) programme and the FSA now have an approach to feed controls already largely compatible with ROF principles. NIFAC questioned whether, in the interests of ensuring food you can trust, there was a job to do in communicating some of the information about measures to protect the food system to consumers, starting with animal feed, to increase their confidence in the supply chain. It was noted that where there is greater confidence in the systems in place, public trust is likely to be more resilient in the event of incidents, reducing the potential reputational damage to producers, traders and

regulators. It was acknowledged that pitching this messaging at an appropriate level would be difficult when consumers focus primarily on knowing that food is safe, but lower key messaging to reassure the public that we are here, this is what we do, and this is why you can trust your food, could bring future benefits. A slide contained in Gerard Smyth’s presentation pack described the message succinctly as “You are what you eat eats”.

County Specific Comments

NIFAC commended the Food Fortress scheme as a great example of self-regulation done properly, noting that a substantial number of businesses from Ireland were also engaged in the scheme as well as those from NI. NIFAC were also impressed by moves the industry was taking toward sustainability and reducing environmental harms, noting that all palm oils used in feeds produced in NI come from sustainable crops.

In relation to EU exit, it was noted that Ireland’s Department of Agriculture Food and the Marine (DAFM), while not primarily focussed on North/South trade, had noted some elements of supplying feed into the EU that could present challenges should an agreement not be reached, including a requirement, if trade is to continue on the current basis, for the suppliers to have premises in Ireland. This will prove difficult for some of the smaller scale suppliers.

Actions for Executive

No actions arose from the discussion for FSA in NI staff to take forward.