
CO-OPERATION BETWEEN INDUSTRY ASSOCIATIONS AND NATIONAL AUTHORITIES

Gaining efficiency on feed safety through structured dialogue between
operators and control authorities

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Foreword

Securing feed safety is resource intensive for operators of the feed chain, who hold primary responsibility for the safety of the products they place on the market and also for control authorities, who are required to dedicate sufficient resources to verify the adequateness of the feed safety management systems put in place by operators and implement risk oriented control plans.

The Food & Veterinary Office in its overview report on implementation of the EU Feed Hygiene legislation pointed to the little value paid in general by control authorities to own controls implemented by operators, whether on their own capacity or via collective risk management tools such as feed safety assurance schemes or collective monitoring programmes.

On the other hand, the FVO also pointed to the need to improve the implementation of HACCP principles in the feed chain.

In a number of EU countries, there is already a culture of dialogue between public authorities and feed industry organisations, which translates into strengthened cooperation to improve efficiency for the prevention of feed safety issues and the management of feed safety incidents. Such initiatives often lay in consultation and exchange of information at the level of organisations.

It could be learnt from debates within the FEFAC bodies that feed industry organisations and national authorities are not always aware of what is being done in other EU Member States in terms of cooperation between authorities and operators. Therefore, it was decided to make a non-exhaustive inventory of examples of such initiatives as food for thought. Maybe not all these examples are directly transferable from one country to another as a number of parameters intervene. However, it is also worthwhile pointing to what has proved to be successful.

The hereafter examples have been sorted out against several objectives:

- Information sharing / consultation
- Co-ordination of targeted monitoring
- Official recognition of private feed safety management schemes
- Incident management
- Co-operation for training
- Co-operative research
- Others.

Examples are given at this stage for few countries and it is our intention to complete with additional stories from more EU countries in future editions.

**Overview of selected examples of good co-operation between
feed manufacturers, their associations and control authorities at
national level**

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INFORMATION SHARING / CONSULTATION

Feed dialogue (Futtermittel Dialog)	
Country	Austria
Objective	Informal meetings between feed business operators and authorities on an ad hoc basis.
Parties involved	<ul style="list-style-type: none"> - Individual feed manufacturers - National Feed Industry Association (VFÖ) - National authorities
Initiator	Austrian authorities
Content	Authorities as well as feed manufacturers are entitled to convene a meeting (Feed Dialogue) to discuss (emergency) issues.
Deliverables	Ad-hoc meeting; possibility used only on very few occasions so far.
Benefit for feed manufacturers	Manufacturers get direct contact to authorities and can put forward initiatives or any kind of proposals.
Benefit for authorities	Authorities get quick feedback from operators on any emerging issue.

Futtermittel Jour Fixe (Feed “Jour Fixe”)	
Country	Austria
Objective	To exchange views on feed related issues on a fixed frequency
Parties involved	<ul style="list-style-type: none"> - Feed business operators and their organisations (compound feed, feed additives, petfood, farmers, traders) - National authorities
Initiators	<ul style="list-style-type: none"> - Authorities - Organisations of the feed sectors
Short description	<ul style="list-style-type: none"> - Authorities present the ongoing discussions in SCoPAFF and ask for comments. - Operators share their opinion and may make proposals or recommendations (mainly technical). - Operators may raise issues not connected to SCoPAFF activity.
Deliverables	Informal meetings take place four times a year (spring, June, September, December).
Benefit for feed manufacturers	<ul style="list-style-type: none"> - Authorities have a friendly ear for issues raised by the manufacturers (within the legal limits and/or their power to decide). - Manufacturers get first-hand information on ongoing legal initiatives and are asked for their advice – which things are feasible, which issues are hard to implement; where the problems are and how they could be solved; etc.
Benefit for authorities	Facilitates decision making process and facilitates harmonised enforcement of targeted measures when needed.

Development of legislation on medicated feed	
Country	Poland
Objective	Implementation into national legislation of requirements regarding manufacturing, placing on the market and use of medicated feed based on Directive 90/167/EEC
Parties involved	<ul style="list-style-type: none"> - Grain & Feed Chamber (IZBA) - Polish authorities
Initiator	Polish authorities
Short description	<ul style="list-style-type: none"> - Ministry of Agriculture and Rural Affairs together with Main Veterinary Office implemented Directive 90/167/EEC into national legislation as part of the EU accession roadmap. The process started in the second half of 2006 and was finalised beginning of 2007. - Throughout the whole process there was a close cooperation between authorities (both Ministry and Veterinary Office) and IZBA, including a number of working group meetings, discussions and negotiations.
Deliverables	National regulation on medicated feed which is well accepted by both the authorities and feed sector operators.
Benefit for feed manufacturers	Clear, workable regulation assuring feed safety
Benefit for authorities	Legislation well understood by operators and therefore better implemented.

COORDINATION OF TARGETED MONITORING

Data exchange on contaminants	
Country	Belgium
Objective	To optimise monitoring costs and share results between authorities and operators
Parties involved	<ul style="list-style-type: none"> - National Feed Industry Association (BEMEFA) - Federal Agency for the Safety of the Food Chain (FASFC)
Initiator	BEMEFA
Short description	<ul style="list-style-type: none"> - BEMEFA establishes a collective monitoring plan based on a statistical model involving compound feed manufacturers; the plan is reviewed every year. - Results of monitoring are collected in a database and are forwarded to authorities. - Authorities provide in return the results of their controls.
Deliverables	Monitoring database.
Benefit for feed manufacturers	<ul style="list-style-type: none"> - Manufacturers get access to the results of the official controls, which come as additional information to better allocate the monitoring resources depending on risks.
Benefit for authorities	Authorities get access to additional information to better design their monitoring plan.
More information	http://www.bemefa.be/SamplingPlan.aspx?lang=nl

Aflatoxin monitoring in maize and maize co-products	
Country	Belgium
Objective	To secure the supply chain of maize and maize by-products with regard to aflatoxins
Parties involved	<ul style="list-style-type: none"> - Feed Safety Assurance Scheme (OVOCOM) - BEMEFA - Federal Agency for the Safety of the Food Chain (FASFC)
Initiator	BEMEFA / OVOCOM
Short description	Within OVOCOM, extra monitoring requirements are laid down imposing each supplier of maize and maize by-products from at-risk countries to analyse each consignment for aflatoxins.
Deliverables	Specific monitoring scheme in 2013/14.
Benefit for feed manufacturers	<ul style="list-style-type: none"> - Secure the supply of maize to the feed industry to avoid in particular excessive levels of Aflatoxin M1 in milk; - Avoid administrative burden if monitoring would have been mandatory.
Benefit for authorities	<ul style="list-style-type: none"> - Authorities contributed to the design of the monitoring plan, in particular the selection of at-risk countries; - Guarantee that any consignment of maize from at-risk countries was controlled.

Aflatoxin control in the feed chain	
Country	Spain
Objective	To manage the aflatoxin risk
Parties involved	<ul style="list-style-type: none"> - Spanish Feed Industry Association (CESFAC) - Spanish authorities
Initiator	CESFAC and Spanish authorities
Short description	<ul style="list-style-type: none"> - Intensification of certified controls of feed materials with a potential risk of presence of aflatoxins (also for forages on the farm). - Review and control made by regional control authorities of the analyses performed by operators. - Definition of a safety margin regarding aflatoxin in feed materials to avoid excessive levels of aflatoxin in milk.
Deliverables	<ul style="list-style-type: none"> - Monitoring programme specifying at-risk feed materials and monitoring frequency. - Risk management measures to secure that at-risk feed materials are not used in dairy feed.
Benefit for feed manufacturers	<ul style="list-style-type: none"> - Allow interception of contamination at an early stage, thus avoiding recalls. - Secure the supply chain.
Benefit for authorities	<ul style="list-style-type: none"> - Guarantee appropriate control of aflatoxin at an early stage of the chain thus reducing the need for official control resources.

Collective Salmonella monitoring	
Country	Denmark
Objective	To control Salmonella incidence in feed and coordinate risk management measures in case of detection.
Parties involved	<ul style="list-style-type: none"> - National Feed Industry Association (DAKOFO) - Danish authorities
Initiator	DAKOFO
Short description	DAKOFO collects results of Salmonella monitoring performed by its members. The results are communicated to national authorities.
Deliverables	Database
Benefit for feed manufacturers	<ul style="list-style-type: none"> - Better overall picture of the occurrence of Salmonella in feed materials, thus allowing to better target the monitoring. - Reduction of official control frequency.
Benefit for authorities	Authorities get full picture of the incidence of Salmonella in feed and can therefore better target their official controls.

Import of feed materials from Ukraine	
Country	Poland
Objective	Improvement of quality of feed materials and means of transport
Parties involved	<ul style="list-style-type: none"> - Grain & Feed Chamber (IZBA) (includes traders and feed manufacturers) - Polish authorities
Initiator	Polish authorities
Short description	Control authorities drew attention of operators to quality/safety issues regarding feed materials imported from Ukraine, including in relation to transport means.
Deliverables	<p>Establishment of a procedure whereby:</p> <ul style="list-style-type: none"> - importers inform their contractors about any sanitary issue related to feed material or transport means; - control authorities monitor the issue, and report on the trend (improvement, worsening); - interested parties meet within next 3-4 months for update.
Benefit for feed manufacturers	Assurance of proper quality and safety of feed materials.
Benefit for authorities	Better control of imports.

OFFICIAL RECOGNITION OF FEED SAFETY MANAGEMENT SYSTEMS

Recommendation for the Control of Salmonella in Feed Production (EMPFEHLUNGEN zur Beherrschung von Salmonellen in der Futtermittelproduktion)	
Country	Austria
Objective	Establishment of guidelines for the control of Salmonella in feed production as well as guidance for company own checks.
Parties involved	<ul style="list-style-type: none"> - National Feed Industry Association (VFÖ) - Oilseed crushing plants - Traders - National authorities
Initiator	Austrian authorities
Short description	<ul style="list-style-type: none"> - The guidelines describe four levels: Level 1 – Routine, Level 2 – Occasional Salmonella in feed materials, Level 3 – Cumulated Salmonella in feed materials, Level 4 – Human infections due to Salmonella in feed materials. - Detailed descriptions of all four levels are provided for three types of businesses: oilseed crushing plants, traders, feed manufacturers.
Deliverables	Recommendations and coordinated guidance for the three types of businesses for each level.
Benefit for feed manufacturers	<ul style="list-style-type: none"> - Better understanding for Salmonella risk within feed production and along the chain. - Better understanding of the authorities approach on Salmonella risk management.
Benefit for authorities	Awareness rising at operators' level and better co-ordination to manage incidents.
More information	<u>EMPFEHLUNGEN zur Beherrschung von Salmonellen in der Futtermittelproduktion</u>

Recognition of third party certified Feed Safety Management system (OVOCOM)	
Country	Belgium
Objective	To enforce efficient feed safety management systems at feed compounders level and obtain recognition of Feed Safety Management systems by national authorities
Parties involved	<ul style="list-style-type: none"> - Feed safety assurance scheme (OVOCOM) - Belgian Feed Industry Association (BEMEFA) - Federal Agency for the Safety of the Food Chain (FASFC)
Initiator	FASFC/BEMEFA
Short description	Drafting of self-checking guide validated by FASFC and managed by OVOCOM.
Deliverables	Self-checking guide G-001.
Benefit for feed manufacturers	Rebate on control fees for companies implementing the self-checking guide
Benefit for authorities	<ul style="list-style-type: none"> - Confidence in Feed Safety Risk management system in place in feed mills and its proper enforcement - More targeted, efficient official controls.
More information	http://www.ovocom.be/?lang=en

Earned recognition of third party certified Feed Safety Management system (Universal Feed Assurance Scheme – UFAS, Feed Material Assurance Scheme – FEMAS, Trade Assurance Scheme for Combinable Crops – TASCC)	
Country	United Kingdom
Objective	Reduced regulatory burden for certified companies to the AIC feed assurance schemes (see above)
Parties involved	<ul style="list-style-type: none"> - Agricultural Industries Confederation – AIC’s feed assurance schemes - UK control authorities (Food Standards Agency - FSA / Veterinary Medicines Directorate - VMD)
Initiator	UK authorities / AIC
Short description	The Project compared the feed assurance schemes against key requirements of EU and UK feed legislation, and assessed the rigour with which the schemes were enforced. The aim was for the authorities to recognise the role of feed certification in demonstrating compliance with feed legislation, and so allow a lower risk rating for certified businesses to be agreed.
Outcome	As a result of the project, certified participants can now expect an inspection from the FSA (and VMD where medicated feed is produced) every 3-4 years, instead of every 1-2 years.
Benefit for feed manufacturers	Reduced inspection burden from regulators, and reduced costs for medicated feed approval.
Benefit for authorities	Ability to focus on limited resources where evidence of poor compliance, or absence of feed safety certification.
More information	http://www.food.gov.uk/sites/default/files/multimedia/pdfs/earnedrecog.pdf https://www.aictradeassurance.org.uk/ufas/documents/ufas/

Recognition of third party certified Feed Safety Management system (OQUALIM)	
Country	France
Objective	OQUALIM is an association which supports, structures and coordinates joint initiatives in the animal feed sector in order to ensure feed safety
Parties involved	<ul style="list-style-type: none"> - OQUALIM - Control authorities
Initiator	Feed Industry Associations (SNIA, Coop de France)
Short description	<p>OQUALIM provides individual companies involved in the feed sector (compound feed, mineral feed, premixtures) the opportunity to participate in two initiatives:</p> <ul style="list-style-type: none"> - Third party certification of compliance with professional standards regarding good hygiene and manufacturing practice; - Joint monitoring plan for chemical and biological contaminants.
Deliverables	<ul style="list-style-type: none"> - Guides to good practice officially recognised by authorities. - Convention under discussion for recognition of OQUALIM monitoring plan in the official monitoring programme.
Benefit for feed manufacturers	French authorities officially recognised the OQUALIM guides to good hygiene practice (compound feed, premixtures, mineral feed) and take into account the certification system when performing official inspections.
Benefit for authorities	<ul style="list-style-type: none"> - Facilitate official controls and ranking of operators depending on their risk profile; - Allow access to consolidated monitoring results.
More information	http://www.oqualim.fr/

FEED SAFETY INCIDENT MANAGEMENT

Crisis Management Contact List	
Country	Austria
Objective	Crisis Management
Parties involved	<ul style="list-style-type: none"> - Individual Feed companies - National Feed Industry Association (VFÖ) - National authorities
Initiator	National Feed Industry Association (VFÖ)
Short description	<p>The feed industry association provides a list with (emergency) contact details of its members. A list with the persons in charge of quality management/feed safety of each feed manufacturers with their contact details is shared with the authorities as well.</p> <p>In case of incidents, the authorities are not only able to contact the manufacturers directly concerned, but also they have the mobile numbers of the person in charge of QM/feed safety.</p>
Deliverables	So far the tool has not been used yet.
Benefit for feed manufacturers	Information flow is faster and involves the right person. Feed manufacturers can react faster if incidents are to happen.
Benefit for authorities	Authorities are ensured they speak to the right person, i.e. they can get access to first-hand information and also are assured that any incident management measure taken is well understood and implemented by operators.

Traceability exercise – simulation of feed contamination	
Country	Belgium
Objective	To check that traceability systems implemented by companies are effective in case of incident.
Initiator	Belgian authorities
Short description	Exercise performed every 3 years.
Deliverables	Procedure for simulation
Benefit for feed manufacturers	Validation of traceability systems implemented by operators.
Benefit for authorities	Confidence in systems developed by companies.

COOPERATION FOR TRAINING

Implementation of EU code of good labelling practice for compound feed for food producing animals

Country	Czech Republic
Objective	To provide both feed business operators and competent control authorities with a tool for implementation of Regulation (EC) No 767/2009 at national level (labelling of compound feed, catalogue of feed materials, claims).
Parties involved	<ul style="list-style-type: none"> - Czech Feed Industry Association (SKK) - Control authorities
Initiator	Czech Feed Industry Association (SKK)
Short description	In order to ensure a common understanding between operators and authorities as regards the implementation of the feed labelling legislation, training sessions were organised in co-operation with national authorities to the attention of feed manufacturers and local authorities, based on the draft Code of Good Labelling Practice elaborated by FEFAC and Copacogeca pending its official adoption.
Deliverables	Proper implementation of labelling rules by operators without substantial problems including claims.
Benefit for feed manufacturers	Feed manufacturers have an effective tool including meaningful interpretation of feed labelling legislation to refer to in case of official control
Benefit for authorities	<ul style="list-style-type: none"> - Facilitate official controls - Facilitate the enforcement of the legislation.

HACCP training courses for control authorities and compound feed manufacturers

Country	Spain
Objective	Improve the understanding of HACCP and its implementation in compound feed industry.
Parties involved	National and Regional control authorities Spanish Feed Industry Association (CESFAC)
Initiator	National authorities and CESFAC
Short description	The course provides skills, knowledge and core competences for the practical implementation of the HACCP in a feed mill. Deepen theoretical knowledge of food security, focusing on the most relevant regulations and identifying the main threats to the feed industry.
Deliverables	Improvement of feed safety risk management in feed mills Capacity building for proper implementation of HACCP system.
Benefit for feed manufacturers	Share the main critical points in the manufacturing sector feed with operators and administration
Benefit for authorities	Allow training of controllers with good understanding of the HACCP method and make use of this knowledge to optimise resources for official controls.

COOPERATIVE RESEARCH

Dust as an indicator for the presence of Salmonella in compound feed	
Country	Austria
Objective	To use dust as an indicator for the presence of Salmonella in compound feed production at storage and during production process
Parties involved	<ul style="list-style-type: none"> - National Feed Industry Association (VFÖ) - National authorities
Initiator	Austrian authorities
Short description	<p>Aim of the project was</p> <ul style="list-style-type: none"> - to identify CCPs of the productions process - to improve sampling procedures - to get an overview on improvement of company own check systems - to get an overview on common serotypes in feed - to assess the extent to which feed may be responsible for Salmonella contamination in food of animal origin
Deliverables/ Findings	According to the report: <i>“Despite installed hygiene measures a Salmonella contamination of the food production chain through feed can never fully be excluded meaning a direct risk to humans.”</i>
Benefit for feed manufacturers	Improvement of Salmonella risk management system
Benefit for authorities	<ul style="list-style-type: none"> - Better understanding of the contribution of feed to Salmonella contamination in food of animal origin; - More focussed controls.
More info	<u>Staub als Indikator zum Nachweis von Salmonellen (SINS) in der österreichischen Mischfutterproduktion in Lagerstätten und entlang der Produktionskette</u>

Research about Salmonella in feed	
Country	Spain
Objective	To gain knowledge on Salmonella risk and to develop tools to allow optimised management in the chain
Parties involved	<ul style="list-style-type: none"> - Feed Manufacturers Associations - National authorities
Initiators	Spanish Feed Manufacturers Association (CESFAC) and National authorities
Short description	<ul style="list-style-type: none"> - Development of detailed and harmonized scientific-based sampling procedure - Assessment of the incidence of Salmonella, Enterobacteriaceae, E. Coli in compound feed and feed materials (also environment) - Study of Salmonella “prevalence” in feed mills, including home-mixers - Identification of critical control points in feed mills
Deliverables	<ul style="list-style-type: none"> - Comparison study on serotypes in feed material vs. complete feed vs. human showing little correlation - Robust sampling method - Identification of main CPs in feed mills - Database on Salmonella incidence
Benefit for feed manufacturers	<ul style="list-style-type: none"> - Determination the main critical points in the factory about Salmonella. - Identification of critical feed materials - Lower incidence of Salmonella in feed.
Benefit for authorities	More targeted controls

OTHERS

Electronic prescription for medicated feed	
Country	Belgium
Objective	To digitalize the drafting and transmission of prescriptions for medicated feed between different parties in full compliance with legal requirements
Parties involved	<ul style="list-style-type: none"> - National Feed Industry Association (BEMEFA) - Veterinarians - Farmers - National authorities
Initiator	Feed Industry Association (BEMEFA)
Short description	Development of a voluntary electronic tool to allow: <ul style="list-style-type: none"> - The drafting of prescriptions by veterinarians using smartphones and tablets - The transmission of prescriptions between the partners in an electronic way. - Digitalization of the content of the prescription, e.g. for antibiotic data collection systems
Deliverables	<ul style="list-style-type: none"> - Electronic tool with templates - Database recording the content of prescriptions, accessible to the prescribing veterinarian and the producer of the medicated feed
Benefit for feed manufacturers	<ul style="list-style-type: none"> - Prescriptions obtained more rapidly (in the benefit of the farmer / quicker treatment of sick animals) - Less risk of mistakes (handwritten prescriptions not always easy to read) - Digital content of prescription available
Benefit for authorities	More controllable system (e.g. time stamping)
Benefit for farmers	Quicker delivery of prescribed medicated feed (more efficient treatment of sick animals)
Benefit for vets	User-friendly tool for drafting and sending of prescriptions of medicated feed and digital content of prescription available (data collection, bookkeeping)