

IGFA Submission to the National Farmed Animal Health Strategy Consultation November 2016

Association Background

IGFA represents the interest of the animal feed industry in Ireland. The membership consists of: **Feed Manufacturers:** producing over 90% of Ireland's 4 million tonnes of compound feed. **Grain Merchants:** handling 85% of the 2 million tonne crop. **Feed Material Importers:** importing a total of 3 million tonnes of feed ingredients. The membership also consists of **Ancillary Members:** 65 of these are made up of suppliers of nutritional supplements, premix, and technical services. The membership is a combination of independent and farmer controlled companies. Many of these companies operate globally and are part of fully integrated food businesses.

General Comments

The document is very comprehensive and informative. We welcome the intention to develop better stakeholder involvement with an Animal Health Strategy. In addition, IGFA supports the intention to ensure animal health programmes are appropriately and sustainably funded on the basis of a formal objective evaluation of benefits and costs. IGFA would make the following initial comments:

- (1) A review should be undertaken of existing codes or guidance already in place within the industry on disease controls and biosecurity measures. In addition, there may be systems or guidance available in other jurisdiction that could be adapted to the Irish situation. It is important not to duplicate what is already in place but to build on these systems. e.g. DEFRA Salmonella code of practise is already an industry norm within the feed trade.
- (2) The Biosecurity and disease controls systems for the intensive poultry sector in the Cavan and Monaghan area should be given particular attention.
- (3) During a disease outbreak, many animals may still need to be fed. Managing the transport of feed to and from these areas should not be overlooked.
- (4) The use of medication on farm should be urgently monitored at veterinary and farm level and particular attention should be paid now to the increasing use on dairy farms.
- (5) North-South technical level meeting minutes should be published.
- (6) A comparative analysis of the implementation of different animal health controls system between the North and South should be made available to stakeholders.

The Role of Feed

The role of the feed industry and nutritionists is to provide safe, nutritious feed for livestock. The Consultation document states that, nutrition of farm animals is one of the four main pillars of output. In order to provide for the increased global demand for food, adapting and improving the nutrition of animals, to improve the quality and safety of food while reducing the environmental foot print of livestock products will be a challenge.

As the documents states *accepting the status quo in respect of the four pillars will not be sufficient to sustain Irelands position as a leading producer of high quality animals and animal based products*. Already today we have available to us new nutritional systems and technology that can be used to provide solutions

- ✓ Antibiotic use can be reduced by the preservation of gut health through nutrition.
- ✓ Feed Formulators can boost animal performance by mitigating the effects of anti-nutritional factors in micro ingredients or co-products.
- ✓ Adapted feed strategies to precisely meet the well being and expected output of the animal.
- ✓ Modern fortified and enriched plant co-products can be used to promote high value or fortified animal products.

Feed Safety & Biosecurity:

The strategy will encompass the integrity and risk inherent in the feed supply chain for livestock and human health (page 15) and Chapter 1V (J).

The Association agrees with the **Relevant Considerations** in Section J with the following comments:

- *Any new feed material or **SUPPLIER** carries a risk unless appropriately risk assessed.*
- *The use of plastic / paper tote bags is not permitted under our feed assurance systems. (Rigid IBCs may be reused once a risk assessment has been performed and appropriately cleaned).*
- *Poorly maintained feed and **grain stores** can facilitate the contamination of the feed chain.*
- *The feed and food chain has always been globalised, the challenge is to **handle the changes in trade flows so that new suppliers or supplies are properly managed.***

Comments on Strategy:

IGFA believes the feed chain in conjunction with the authorities is best placed to understand and mitigate the risk collectively. The way we manage this risk is through (1) capacity building (2) sharing of responsibility along the chain (3) close cooperation with the feed section of DAFM.

Capacity Building: IGFA provides regular training for members on HACCP and risk management. The training also encompasses correct nutritional advice with updates on feed legislation. This training should be promoted all along the chain, this should include “buy in” at senior management levels. A web based system could be developed to increase access to this type of training.

Sharing of Responsibility along the Chain: Our feed safety system is developed along the principle, that each sector of the chain can best manage its own risk. These systems are all third party and independently audited and recognised internationally. The systems rely on constant communication up and down the chain

on risks. It is our belief that non-compliant feed should be intercepted at the earliest possible stage along the chain. The suppliers must develop robust monitoring plans and pass information along the chain. Testing of finished feed whether by industry or authorities is verification and not an **early warning tool**. The professional industry has invested heavily in these systems over the years and they have proved their worth.

Co-Operation with Authorities: IGFA members work with DAFM by notifying all arrival of cargos. This is a voluntary SOP and initially was used to risk assess cargos for inspection under TSE. It is now used as a general risk assessment tool for undesirable contaminants. The SOP has now been extended to encompass imports of nutritional additives and supplements. No other country in the EU has a comparable system in place.

These initiatives should be considered when evaluating any future strategy. Duplication with further codes and guidance for the feed sector must be avoided.

The development of a feed stakeholder network could have a wider remit than reporting on” **new and emerging risk** “The group could (1) review as a learning exercise past feed incidents, (2) Encourage better uptake and responsibility from the integrated food chain businesses for the safety of their co-products and future possible “waste streams “. (3) Promote “buy-in” from senior management along the chain for the four pillars of animal health and welfare. (4) Engage in an open way on medication of farm animal and the need to reduce the use of AB across the chain. (5) Engage in preparedness exercises in the event of major outbreaks (6) Develop stakeholder driven biosecurity protocols for deliveries of feed in peace time and in times of emergency. (7) Seek to develop closer linkages between the global suppliers of the new feed technologies (probiotics, antibiotic alternatives, novel feeds) and our Universities in order to promote research and manufacturing expertise in this area.