

## Department for Environment, Food and Rural Affairs

### Summary of responses to the consultation on the Codes of Practice for the Control of Salmonella in Animal Feeds between 7 November 2008 and 30 January 2009

August 2009

#### 1. Introduction

- 1.1 On 7 November 2008 Defra published a UK-wide consultation paper seeking views on the proposed revised codes of practice for the Control of *Salmonella* during transport, storage and production of animal feeds. The consultation period ended on 30 January 2009. The purpose of the codes is to ensure that feedingstuffs are of satisfactory microbiological quality, and to support the new *Salmonella* control legislation. They cover the mandatory provisions that feed businesses must carry out to comply with the techniques of Hazard Analysis Critical Control Points (HACCP) required by the feed Hygiene Regulation (EC 183/2005) for the monitoring and control of *Salmonella* in animal feedingstuffs.
- 1.2 The detailed codes of practice provide non-statutory guidelines applicable to all feed business operators for establishing good production *practices* for compound feeds, premixtures and safeguarding the microbiological quality of compound feeds, premixtures, feed materials as well as additives used directly or intended for incorporation into animal feedingstuffs. The legal basis for the control of Salmonella is laid down in Feed Hygiene Regulations (EC) No 183/2005, Zoonoses Directive 2003/99/EC and the Zoonoses Regulation (EC) No 2160/2003.

#### 2. Summary and consultation process

- 2.1 A full public consultation on proposed revised codes of practice for the *transport*, storage and production of animal feeds ran from November 2008 to January 2009. Notification about the launch of the consultation was sent to around 178 stakeholders including individual producers and industry representative bodies, government departments and agencies, consumers groups, retailers and the general public. The consultation document was freely available on the Defra website.
- 2.2 We would like to thank everyone who responded to this consultation and we are grateful for all responses received. This summary does not attempt to detail all responses submitted but gives an indication of the common themes emerging from the consultation exercise.
- 2.3 In line with Defra's policy of openness, at the end of the consultation period, copies of the responses received are publicly available.

2.4 Four implementation questions were put forward during the consultation . These were:

<b>Question 1</b>	Do you agree with the analysis and assumptions in the Codes of Practice for the control of <i>Salmonella</i> ?
<b>Question 2</b>	Have any practical advice or recommendations been left out? What are they?
<b>Question 3</b>	Do you believe there are other ways in which government can support industry to reduce or control <i>Salmonella</i> prevalence in feed?
<b>Question 4</b>	How can Defra publicise these codes to industry?

2.5 There were a total of 12 respondees to the consultation for the revised Codes of Practice from a variety of sectors, including industry groups, individual producers, a government agency, and trading standard groups, and an Advisory Committee. A list of respondents is at Annex 1. Although the number of respondees was not high, this reflects the structured nature of the industry, as many of them represented a large number of individuals or companies, both in the farming and feed production sectors. This paper summarises their responses and the action taken by Defra to address them since the consultation period ended.

2.6 The responses were generally supportive, with detailed editorial comments (especially from some specific sectors) but also highlighting areas of concern or which they believed needed clarification. From this, a number of themes emerged.

2.7 Some of the respondees felt that the three codes were very similar in places and thus involved a lot of repetition, especially for parts of industry to whom all three applied. Several suggested the three Codes should be amalgamated into one. *Defra's response was indeed to redraft the original three Codes into a single new one, with three short Annexes containing sector-specific information. This has significantly reduced the overall length of the Codes and means that information for all sectors is contained in one document.*

2.8 Some felt the Codes needed to be clearer and more consistent in their use of "must" and "should" and terms such as "feed", "finished feed", "feed materials", etc. *In response, the new Code now contains a list of definitions and has been scrutinised to ensure consistency of use of terms. In addition, the term "product" has been used throughout to replace "compound feeds, additives, premixtures and feed materials" to avoid needless repetition of this phrase. Editorial points have also been taken on board.*

2.9 Some welcomed the less prescriptive approach concerning sampling (HACCP Based) whilst others preferred more detailed sampling instructions. In addition, there were requests for much more background information on Salmonella, such as - common and most significant serotypes, techniques for destroying, who should be responsible for sampling in stores, disinfectant lists, dosage rates, and

lists of companies who carry out Cleansing and Disinfecting (C & D). *Defra felt that much of this information fell beyond the scope of the Codes, and was better covered elsewhere. However, a link to the list of Defra approved disinfectants has been added as requested.*

- 2.10 There was also a belief within certain sectors that they had not previously fallen within the scope of the Codes, and were now covered i.e. that the scope had been extended. In fact, these sectors had always been within the scope of the Codes, but that fact had not been fully appreciated. *Defra and the FSA have arranged to meet with representatives of the sectors involved to discuss and explain the scope of the new Code and the Feed Hygiene Regulations. This will be done ahead of the launch of the revised Codes to allow them to pass this information on to their members first.*

### **3. The way forward**

The Code will shortly be sent for printing, and the industry will be informed in advance of the proposed publication date.

## **Annex 1**

### **Alphabetical list of respondents for the Consultation on the Codes of Practice for the Control of Salmonella in Animal Feeds**

Advisory Committee on Animal Feedingstuffs  
ADAS UK Ltd  
Assured British Pigs  
Agricultural Industries Confederation  
Assured Food Standards  
British Association of Feed Supplement and Additive Manufacturers  
Food Standard Team  
Grain and Feed Trade Association  
National Farmers Union  
National Pig Association  
National Veterinary Institute  
Trading Standards Institute  
Veterinary Laboratories Agency