

# **ANIMAL FEED CONTROLS**

## **PROGRAMME (2009-2011)**

### **Background**

The activities of the DAFF in the area of animal feed controls is set out in the following documents:

- 1) Article 41 of Regulation (EC) No 882/2004 of the European Parliament, requires Member States to transmit a single integrated Multi-Annual National Control Plan (MANCP) concerning the implementation of their programmes. Feedingstuffs control activities have been included in the MANCP.
- 2) Further, more detailed, information on the scope of feedingstuffs controls is set out herewith in the Animal Feed Controls Programme 2009 – 2011.
- 3) Very specific details on the type, numbers and individual Feed Business Operators subject to controls are set out in the Feedingstuffs Annual Inspection Programme (FAIP). The information in this document is considered sensitive and is subject to restricted access.

### **Animal Feed Controls – Programme (2009 – 2011)**

In Ireland, DAFF is the competent authority with responsibility for the negotiation, transposition and enforcement of EU legislation in the feedingstuffs area. The Divisions of DAFF centrally involved in this activity are the Feedingstuffs Division and the Crop Production and Safety Division, collectively referred to as the Animal Feedingstuffs Control Group.

### **Strategic Objectives for the Animal Feedingstuffs Control Group (AFCG)**

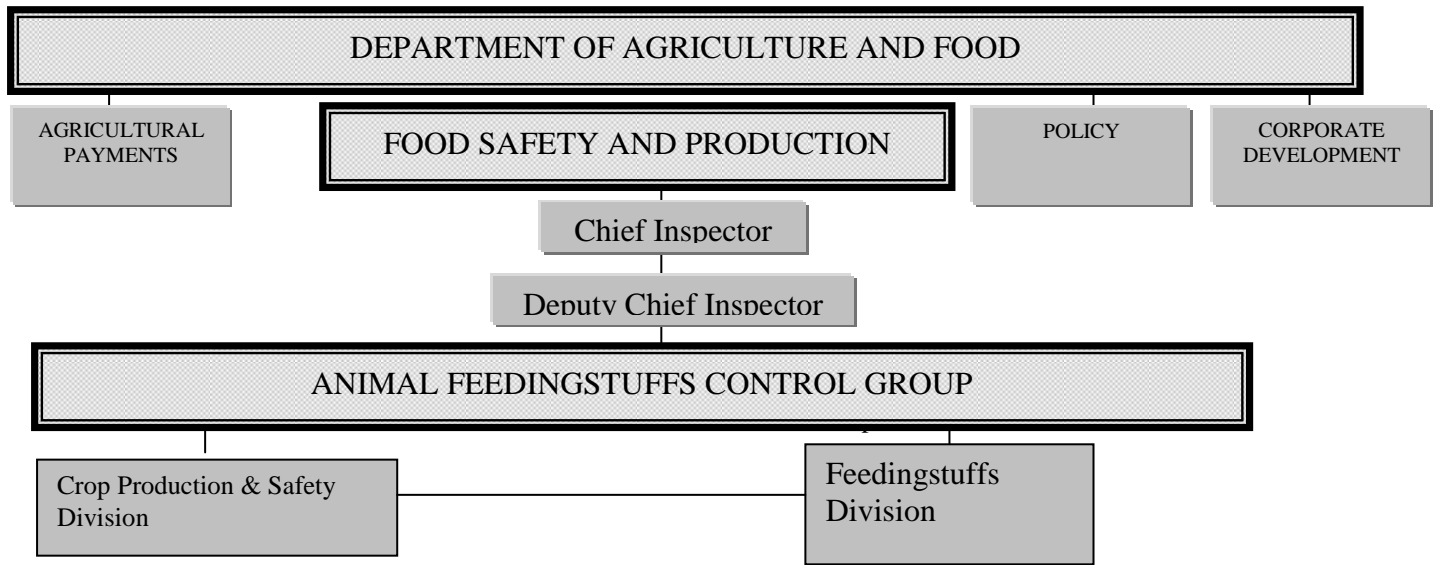
- To negotiate the most favourable EU policy in relation to feedingstuffs which enhance food safety, and animal and crop production under Irish conditions;
- To implement an efficient programme of inspections, sampling and analysis to ensure that feedingstuffs do not endanger food safety or animal health, and to ensure that all operators in the feed chain comply with statutory requirements concerning imports, storage, manufacture, trade and use;
- To ensure that all Feed Business Operators (FBOs) are registered in accordance with relevant EU legislation and that these operators fulfil the obligations such registration places on them;

## Areas of competence / scope of responsibility

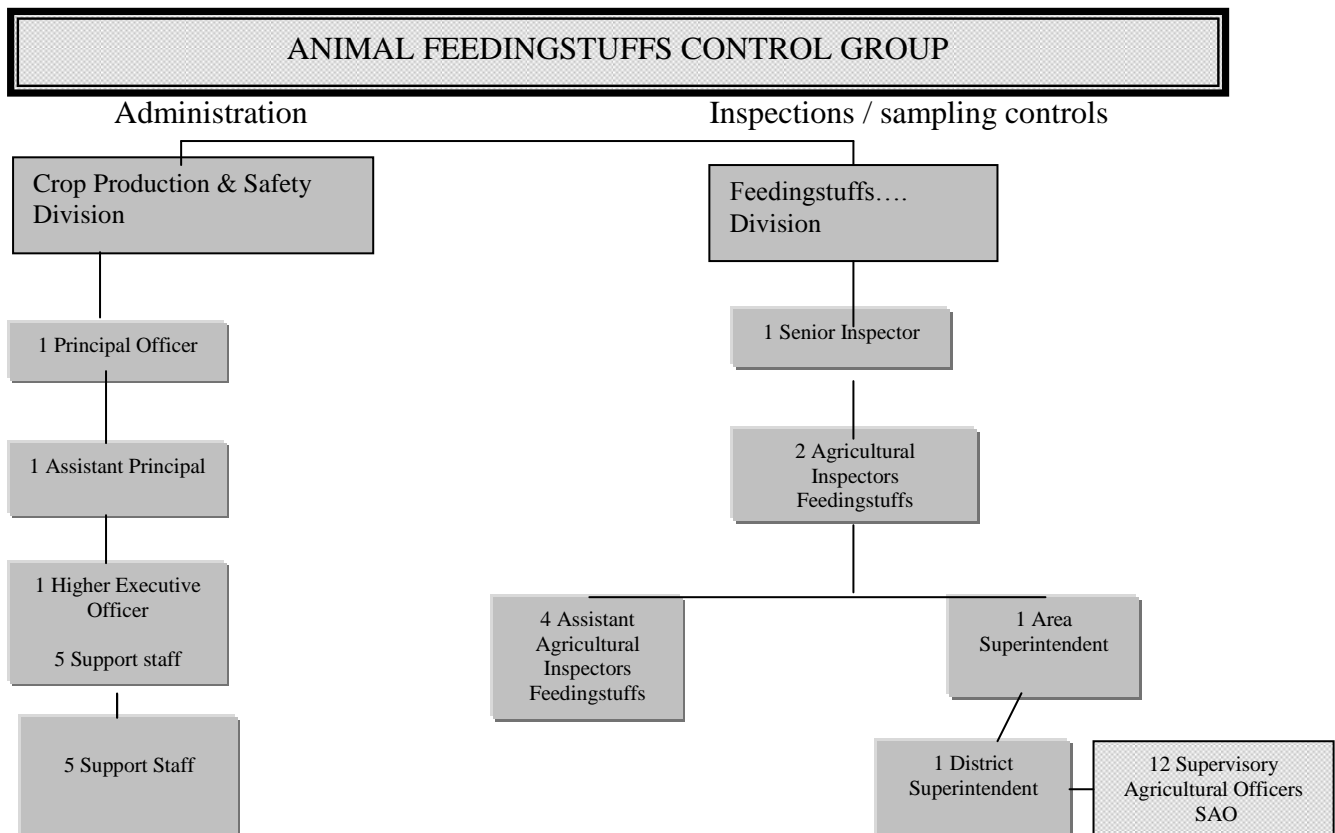
At central level the AFCG negotiate EU policy, transpose legislation, and establish a risk based inspection programme for animal feed as well as administering, coordinating and implementing that programme.

## Reporting and communication channels

The organisational chart below outlines the organisation of the AFCG within the Department of Agriculture and Food.



The organisational chart below outlines the organisation of the AFCG in terms of human resources available for the purpose of carrying out official controls:



### **Feedingstuffs Division:**

The Inspectorate staff at central level (1 Senior Inspector, 2 Agricultural inspectors, 4 Assistant Agricultural Inspectors) are authorised under the various Regulations on feedingstuffs to carry out designated functions, including the inspection of premises and the sampling of produce of imported and domestic origin for analysis. Authorised Officers are empowered to inspect all premises where feedingstuffs are manufactured, imported, stored or used, including use at farm level, and to seize and detain products where they have reasonable grounds for believing that a contravention of the feedingstuffs regulations has occurred.

The general responsibilities of the Agricultural Inspectorate staff include the following:

- Participation at Commission and Council meetings relating to feedingstuffs issues;
- Assist in the transposition of legislation;
- Draw up an annual control plan;
- Coordination and implementation of the control plan;
- Deal with infringements of the legislation;
- Preparation of a report on the outcome of controls in the field of animal nutrition;
- Carry out inspections at all stages of the production, storage, distribution and use of animal feed;
- Review the outcome of inspections & carry out/ coordinate the relevant follow up actions;
- Training of regional inspection staff;
- Monitor developments in the industry;
- Advise and liaise with the industry on various issues.

At regional level the Authorised Officers carry out certain designated functions in line with those pertaining to the Inspectorate staff at Central level. These include the routine inspection of premises; sampling of imported feed materials along with materials of domestic origin for analysis. Again, Authorised Officers at regional level are empowered to inspect all premises where feedingstuffs are manufactured, imported, stored or used, and to seize and detain products where they suspect that a contravention of the regulations has occurred.

### **Crop Production and Safety Division (CPSD)**

All CPSD staff are centrally based. Certain staff in the Division (PO, APO, HEO and EO) are authorised officers under the feedingstuff legislation and are empowered, *inter alia*, to direct the CSSO to initiate legal proceedings against a non compliant FBO (following a recommendation from the Feedingstuffs Division); to issue licences and registration certificates to FBOs; and to issue instructions to FBOs to undertake certain activities following the identification of non compliance by Feedingstuffs Division.

The general responsibilities of the staff in the Division are:

- Populate and maintain the FBO database;
- Issue licences and registration forms to FBOs as appropriate;
- Prepare draft legislation for approval by Legal Services Division; —
- Prepare briefing material for Senior Management, Oireachtas; EU; or as requested;
- Address all political, ombudsman and FOI requests;

- Maintain all records/files relating to feed policy and FBOs in an efficient manner;
- Purchase and supply all equipment as required by the field officers;
- Provide any additional administrative assistance as considered necessary by Feedingstuffs Division.

## **Resources supporting official control actions**

### ○ **laboratory facilities:**

The AFCG has access to appropriate laboratory support for its feedingstuffs analysis programme. Details of the analyses carried out in the laboratories used are given below.

### ○ other resources/infrastructure as applicable

The AFCG Headquarters is located at the Department of Agriculture fisheries and Food offices at Backweston, Celbridge, Co. Kildare. This building provides general office facilities, including storage of files. Feed samples are sorted and securely stored at purpose built facilities at the nearby Department of Agriculture and Food Variety Testing Station, Backweston Co. Kildare.

At regional level, field staff and field supervisory staff, are located at Department local offices or operate from their own home. In the case of the local offices there are general office and storage facilities available. In the case of officers working from home arrangements are in place for the officers to provide such facilities.

Officers carrying out inspections are supplied with appropriate protective clothing and footwear. Buckets and scoops are provided for sample taking. Staff are trained in the correct use of this equipment in taking samples of feed. Competency in the use of this equipment and in taking samples is recorded in the officers training record.

The Feedingstuffs Division does not have specific testing or measuring equipment as all samples for analysis are forwarded to a designated laboratory.

The Information Systems Division of the Department of Agriculture and Food is responsible for the maintenance and security of databases used by the AFCG. These databases include the FBO Register; the Inspection database; the Imports database and the Sampling Results database.

## **Laboratories [other than national reference laboratories]:**

### **Designation of laboratories**

The State Laboratory is the principal laboratory responsible for feedingstuffs analysis in Ireland. In the case of all analyses other than for animal proteins (microscopic testing), the State Laboratory undertakes the work and outsources only in the case of certain analyses for which they themselves are not equipped to carry out. Samples of feedingstuffs are submitted to one of the designated laboratories listed in **Table 1**.

**Table 1 Designated testing laboratories****DESIGNATED TESTING LABORATORIES - 2009**

<b>Name</b>	<b>Address</b>				<b>Denoted by</b>
State Laboratory	Backweston Celbridge Co. Kildare Ireland	Young's Cross	Celbridge	Co. Kildare	A
Seed Testing Station	Backweston Celbridge Co. Kildare Ireland	Young's Cross	Celbridge	Co. Kildare	B
Pesticide Laboratory	Backweston Celbridge Co. Kildare Ireland	Young's Cross	Celbridge	Co. Kildare	C
Leatherhead Food RA	Randalls Road	Leatherhead	Surrey	UK	D
Central Veterinary Research Laboratory	Abbotstown	Snugborough Road	Dublin 15	Ireland	E
Teagasc Johnstown Castle			Wexford	Ireland	F
National Equine Centre			Kildare	Ireland	G
Central Laboratories			Banbury	UK	H
Premier Analytical Sciences				UK	I
Eclipse Scientific Group			Chatteris	UK	J
Eurofins Laboratories			Wolverhampton	UK	K
IdentiGen			Dublin	Ireland	L

Details of the analyses carried out in the designated laboratories, the method reference and tolerance applied to analytical results are given in **Annex 1**.

**The Irish Equine Centre**, Johnstown, Naas Co. Kildare is the principal laboratory used by DAFF to undertake microscopic analysis for the presence of products of animal origin in feed materials and compound feeds.

**Measures ensuring requirements applicable to official laboratories are met:**

Providing the competent authority agrees for the State Laboratory to employ the services of other laboratories, then the managing staff in the State Laboratory confirm the current status of the other laboratory's quality system and its accreditation status for the tests required. Where no accredited laboratory can be found, then the managing staff in the State Laboratory must be satisfied with the quality system in use, the test method proposed and that satisfactory performance in proficiency schemes is obtained.

The State Laboratory retains responsibility for all tests carried out in other laboratories provided its managing staff have made the selection based on the criteria above. Where the competent authority specifies a specific laboratory to carry out the analysis, then the State Laboratory will relinquish responsibility for the work.

**The control methods and techniques used and where and when applied**

A feedingstuffs annual inspection programme (FAIP), is drawn up for animal feedingstuffs controls. It includes the control activities undertaken to ensure compliance with the relevant legislation. The programme includes inspection, sampling and analysis activities in relation to all levels of the feed chain. In particular it covers the following broad areas:

- General Food Law
- Feed Hygiene
- The circulation and use of feed materials
- The marketing of compound feed
- Additives for use in animal nutrition
- Undesirable substances in animal feed
- Feedingstuffs for particular nutritional purposes
- Certain protein products used in animal nutrition
- GMO in feed
- Medicated feedingstuffs
- Animal Health (as it relates to animal feed)

The programme is drawn up where appropriate in consultation with other relevant areas within DAFF.

The day to day organisation and implementation of the control activities is driven by the FAIP with each officer assigned to carry out the required tasks in his / her designated areas. Management monitors routine control activities.

### **Control priorities, resource allocation and how they relate to risk categorisation**

The inspection programme runs from 1<sup>st</sup> January to the 31<sup>st</sup> December annually. The programme contains information on the scope of the inspections and on the structure and systems of the control activities. The programme is approved by the Senior Inspector in Feedingstuffs Division as early as possible in the year of operation and no later than 28<sup>th</sup> February of that year. The programme provides information on the following:

- Overview of the inspection activities and the staff involved
- Scope and criteria for controls
- Type and number of inspections
- Type and number of samples
- Type and number of analyses
- Analysis methods, tolerances and designated testing laboratories
- Risk assessment for determining control activities

When drawing up the Inspection Programme each year, a detailed risk assessment is carried out to determine how resources should be used. Once this is determined, the number of inspections and analysis completed for each operator within each segment of the industry is determined using risk based criteria, which takes into account the following:

- The outcome of previous inspections
- Nature of risk to health or the environment associated with an operation or type of feed
- Auto controls of the operator and history of compliance
- Community coordinated controls
- Information on controls in other member states or scientific findings.

Progress on the inspection programme is formally reviewed on a quarterly basis and management makes adjustments in priorities and/or resources as required.

### **Scope and Criteria for Controls**

#### **EP and Council Regulation 1831/2003 (Additives in Feedingstuffs)**

The surveillance programme will aim to ensure that feed additives used in animal feed are authorised under Regulation 1831/2003 and that they are used only in accordance with the conditions of the authorisation. During inspections the relevant labelling particulars of the products will be examined on-site and where samples are drawn, the label will be attached to the

sampling form for verification purposes. Controls will be carried out at all stages of the feed chain from manufacture of the additives to use at farm level. The analysis programme will focus in particular on the following:

- Use of trace elements in animal feed
- Use of authorised and unauthorised medicinal additives (Commission Recommendation 2005/925/EC)
- Use of authorised additives at levels in excess of the maximum levels laid down.

## Trace elements

Commission Recommendation 2005/925/EC requires that member states examine the level of Copper (Cu) and Zinc (Zn) in compound feed for pigs. In addition, cobalt and manganese levels will be checked in sheep and poultry rations.

Element	Type of diet
Copper	Pigs
Zinc	Piglet and finisher
Cobalt	Sheep
Manganese	Poultry

Commission Recommendation (2005/925/EC) includes assessment of certain authorised and not authorised medicinal substances in animal nutrition. The analysis programme will focus on the following:

Substance	Type of ration
<b>Authorised</b>	
Monensin sodium	Broiler
Nicarbazin/Narasin	Broiler (mainly withdrawal)
Decoquinat	Calf and Lamb diets
<b>Illegal use</b>	
Avilamycin	Piglet and finisher
Tylosin phosphate	Pig weaner
Avoparcin	Pigs, Poultry and Cattle
Carbadox	Pig
DMZ	Poultry (turkey)
Salinomycin	Pigs
Monensin sodium	Cattle finishing
Flavophospholipol	Pigs, Poultry and Cattle
Spiramycin	Growing Pigs

Virginiamysin	Growing Pigs and Sows
Zinc Bacitracin	Growing pigs and poultry

The aim is to target those rations or situations where non-compliance may be suspected. In the case of the banned feed additives, the programme will include analysis of home-mix rations.

The State Laboratory has investigated the possibility of outsourcing analyses for Flavophospholipol, Zinc Bacitracin, Avoparcin and Spiramycin in 2009, RIKILT Institute of Food Safety in the Netherlands have a microbiological test available that is suitable for screening the above 4 antibiotics, in addition to Avilamycin, Tylosin and Virginiamycin.

The State Laboratory is currently looking at developing LC-MS/MS capability for detecting medicinal substances in feed and will concentrate initial efforts on the remaining substances listed in Annex II of Commission Recommendation 2005/925/EC that are no longer authorized as feed additives. If this work progresses well, the State Laboratory may be in a position to analyse feed samples for some of these banned substances towards the end of 2009.

With regard to analyzing for additional medicinal substances authorized as feed additives such as Halofuginone and Robenidine, for which the State Laboratory currently do not have methods in place, they have been unable to date to find a contract laboratory that will carryout these analyses.. The plan is to add these and other authorized additives to the list of analytes to be analysed by LC-MS/MS in 2010 once methods are in place for the banned additives. The State Laboratory also hope to move their existing methods for ionophore coccidiostats to the LC-MS/MS as this will give the lower detection limits required to check for cross-contamination and carryover.

In the case of the authorised feed additives, the programme will focus on the absence of coccidiostats from broiler withdrawal diets both at manufacturing level and at farm level.

The Feedingstuffs Division has the responsibility of completing follow up inspections on poultry producers with Nicarbazin residues in broiler livers. An authorised officer of the Feedingstuffs Division conducts a follow up on-farm inspection in certain cases. This takes place as soon as practically possible from the date of the notification of the positive result. The inspection incorporates examination of the feeding system on the farm as follows:

- Details of feedingstuffs delivered i.e. quantity, type, source and date of delivery and the sale of birds from the unit are examined and verified.
- Samples of feedingstuffs kept on the farm are taken for analysis as appropriate.
- Advice is given to the farmer on proper management of feeding bins to ensure cross contamination does not occur and to enable farmers ensure that withdrawal periods are observed.
- All details are recorded on an official inspection form.

In order to reduce the number of broilers presented for slaughter, with residues of Nicarbazin in their livers, all inspections of broiler producers will involve the sampling of withdrawal feed (if available).

### **Council Directive 82/471/EEC (concerning certain products used in animal nutrition)**

The surveillance programme will aim to ensure that certain products used in animal feed are authorised under Directive 82/471/EC (bioproteins) and that they are used in accordance with the conditions of the authorisation. Controls will focus on their use in the manufacture of premixes/mineral mixtures and compound feeds. Where samples are drawn, the labelling particulars will be forwarded to HQ for confirmation of the labelling particulars.

### **Council Directive 96/25/EC (on the circulation and use of feed materials)**

Up to two thirds of the non-forage feed materials used in feedingstuffs are imported, mainly from 3rd countries. All consignments from 3rd countries will be subject to identity checks (customs officials) and documentary checks (DAFF authorised officer) in line with Art 16 of Council Regulation (EC) No. 882/2004. Importers are required to inform the Department prior to importation of a consignment and this information is recorded on a database. The aim is to carry out physical checks and sample imported consignments of feed materials from 3<sup>rd</sup> Countries to check for the presence of animal proteins on a risk basis. This applies also to shipments of EU sourced feed materials.

All feed materials put into circulation will be subject to random checks to ensure that the correct descriptive name and the appropriate labelling particulars accompany each batch. The inspecting officer will complete a report in respect of each inspection carried out at such premises.

The analysis programme will focus in particular on the statutory labelling requirements as laid down in the annex to Directive 96/25/EC and will be based on a risk assessment.

### **By-products of the food industry**

A survey of various food operators was carried out in 2004 in order to determine the type of by-products that are in use in animal nutrition. In 2009 and subsequent years, follow up inspections will be continued at food manufacturer's premises, brokers and at farm level. The aim is to ensure that DAFF can identify any by-product that may represent a potential hazard in animal feed. All by-product manufacturers are to be inspected in 2009.

### **Food Re-Cyclers**

Following on from the Dioxin crisis of 2008, all Food re-cyclers will be inspected at the same frequency levels as compound feed manufactures.

## **Council Directive 79/373 (on the marketing of compound feedingstuffs)**

Establishments manufacturing compound feeds and premix/mineral mixtures will be subject to regular unannounced inspections and a report will be completed in respect of each inspection. Where samples are taken for analysis, the labelling particulars will be attached to the sample report form.

During the inspection, particular attention will be paid to the feed materials in stock, the additives used and the labelling particulars of the compound feeds.

A number of inspections will be carried out on farms with livestock to ensure that purchased compound feed originates from establishments that are registered or approved under Council Regulation (EC) 1831/2003. The labelling details will be examined during the inspection and samples taken on a selective basis.

The analysis programme will focus in particular on compliance with the statutory labelling requirements, as laid down in the annex to the Directive. The origin and number of samples for testing are based on a risk analysis.

## **Council Directive 2002/32EC (on undesirable substances in animal nutrition)**

The analyses of additives and feed materials will be targeted where possible on materials that are considered to represent a potential risk. Particular emphasis will be placed on fulfilling the requirements outlined in Commission Recommendation 576 of 2006 concerning mycotoxin levels in feed materials and compound feed. The selection of samples for analysis is based on the risk analysis criteria laid down in annex XII.

In OMS very high levels of cadmium have been found in zinc compounds used as feed additives (trace elements) originating from China. These findings were not frequent but the levels found were in some case extremely high. The Chinese authorities have not provided an explanation as regards the finding of these high results. Given that no guarantees were received and given that presence of lead and cadmium in trace elements are known hazards and risks, it is appropriate to have an increased monitoring on the presence of lead and cadmium in particular in zinc and manganese trace elements originating from China to assess the extent of possible contamination.

Following on from the Dioxin crisis of 2008, there will be an increase in dioxin testing in 2009 and subsequent years with particular emphasis on food surplus products and grain which has been dried.

## **Council Directive 93/74/EEC (feedingstuffs intended for particular nutritional purposes)**

Control in this category will include the products referred to as “nutritional supplements”. Labels will be checked for compliance, with particular attention being paid to the level of use of additives and the claims made concerning the purpose and efficacy of the products. A limited number of samples will be taken for analysis.

## **Council Regulation (EC) 183/2005 (laying down requirements for feed hygiene)**

During 2009 and subsequent years, 35% of establishments approved for the manufacture of compound feed and 50% of establishments approved for the manufacture of premixes/mineral mixtures will be formally inspected annually to ensure continued compliance with the conditions of approval. These inspections will usually be prearranged in order to ensure that the appropriate personnel are present during the inspection. An inspection report will be completed in respect of each visit and any deficiencies identified will be brought to the attention of the establishment. During the course of a routine inspection a number of key areas are examined: Hygiene, Production, Quality Control, Storage, HACCP and Traceability.

Each of these operators is also subject to a number of un-announced visits. In all cases, two such inspections will be carried out at each mill in each year. In addition, risk assessment criteria are used to identify mills that require additional inspections.

A selection of primary producers is also inspected based on risk criteria. Where appropriate, the results of these inspections will be communicated to the Single Farm Payment unit for Cross Compliance purposes (Council Regulation EC 1782/2003).

Retail outlets for the sale of compound feed will be inspected. The inspections aim to ensure that the compound feed originates from registered or approved premises, that feed is handled in a hygienic manner and that adequate traceability exists.

### **Hauliers**

A number of hauliers of feed will also be inspected, the aim of which is to ensure that feed is transported in such a way as to maintain traceability and prevent cross contamination occurring. A number of inspections will take place at haulier’s headquarters also.

### **Grain Drying**

Following on from the dioxin crisis of 2008, stores of native grain will be inspected in 2009 and subsequent years. The emphasis of the inspections will focus on HACCP and oil used in the drying process.

## **Council Decision 999/2001/EC (concerning protection measures with regard to TSEs and the feeding of animal protein)**

The control measures will involve inspections of storage facilities for feed materials and sampling and analysis of imported feed materials and compound feed. Inspections will also be carried out at compound feed manufacturing premises, intermediary premises and on stock holdings. The number of inspections and sampling frequencies each year will be based on risk assessment criteria in accordance with the requirements of Commission Recommendation 2005/925. A standard report will be completed in respect of all unannounced visits.

In the case of on-farm inspections the results, where appropriate, will be communicated to the Single Farm Payment unit for Cross Compliance purposes (Council Regulation EC 1782/2003).

A number of importers and establishments have been licensed in accordance with Commission Regulation (EC) 1292/2005 to import, use or feed fishmeal and blood products derived from non ruminants. Each importer is required to inform DAFF in advance of importation of a consignment and consignments from 3<sup>rd</sup> countries may not be put into circulation until it has been sampled and analysed for the presence of mammalian bone.

The provision of the Regulations concerning dicalcium phosphate from defatted bones has been availed of by one operator in respect of horse feed. Importers of dicalcium phosphate (mineral origin or otherwise) are required to provide documentary evidence concerning the origin of the material and to pass this information on to their customers (e.g. compound feed mills, premixtures and mineral mixture manufacturers).

## **Directive 2003/99/EC - Salmonella**

The salmonella monitoring programme for feed materials and compound feeds carried out in previous years will be continued in 2009 and subsequent years. The programme will focus particularly on protein sources of vegetable origin. The testing programme is based on risk analysis criteria.

Bulk storage facilities at retail premises will be targeted for sampling, particularly where the hygiene standards are considered to be poor. These samples will include both feed materials and compound feed.

## **Regulation 1829/ 2003 on Genetically modified food and feed.**

Control will focus mainly on imports of feed materials. In addition, documentary checks will be carried to ensure compliance with Regulation (EC) 1830/2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC. Sampling and analysis will be targeted at whole seeds and by products of commercially available genetically modified organisms i.e. soyabean, oilseed rape, maize, cotton and rice. Furthermore,

sampling and analysis will focus primarily on shipments from outside the EU. All relevant consignments of maize and derived products from the U.S which potentially contain non-authorised events will be sent for analysis.

### **Council Directive 90/167/EEC (Medicated Feedingstuffs)**

Under these regulations a licence is required to manufacture a premixture/mineral mixture or a compound feedingstuff containing a medicine. Inspections are carried out at licensed premises and the documentation required under the regulations is inspected. These visits are unannounced and carried out on a regular basis. Inspections will be completed in conjunction with other inspections e.g. 2-4 times per year for feed mills and once per year in the course of farm inspections for home mixers. A standard report form is completed in respect of each inspection. Where samples are taken for analysis, the labelling particulars will be attached to the sample identification form.

Samples of medicated feed will be tested for the level of active substance. Samples of feed manufactured after medicated feed will also be tested to demonstrate the efficiency of flushing procedures practised on the premises. These samples will be drawn at the point of manufacture or import in order to facilitate the testing of these samples within the best before period for the feed i.e. two weeks in some cases.

### **European Communities (Animal By-products) Regulations 1774/2002**

#### **Used Cooking Oil**

Operators who are engaged in the collection, treatment and/or blending of used cooking oil are prohibited from supplying it to the animal feed chain. In order to ensure that this ban is maintained, Animal Feed Inspectors will inspect each of these operators at least once annually.

#### **Phosphorus level in feeds**

The Specialist Farms Services, Environment and Evaluation Division (SFSEE) of DAF requires information on levels of P & N in animal slurries.

For 2009 and subsequent years, it is agreed to test for phosphorus in 50 pig feed samples, 35 poultry feed samples and 35 samples of ruminant feed. Samples are drawn based on production volume by each operator and some samples of home rations will be tested.

#### **Presence of melamine in certain imports from China**

Decision 2008/798 adopted emergency measures for control of milk-based products from China contaminated with melamine, an industrial chemical found in plastics. The Decision had subsequently been extended to soya and soya oil products from China for both feed and food (Decision 2008/921). Following on from these Decisions, melamine checks are in place on all

milk-and soya based feed imports from China. In addition random checks for melamine will be carried out on high protein feed materials (rice gluten, wheat gluten and Corn gluten) from any source. In the case of direct imports from China, the importers are required to bear the costs of checks.

## **Supervision and verification of planned arrangements including reporting arrangements**

- The programme is subject to on-going supervision by staff at central level. As indicated above, progress on the programme is formally reviewed on a quarterly basis.
- Three times yearly liaison meetings take place between DAFF and the State Laboratory to plan the annual work programme and to review progress. In addition, an annual audit is carried out in conjunction with the NRL (Animal Protein) at the Irish Equine Centre in relation to microscopic testing.
- The principle findings from the annual inspection programme are included in the annual reports of the MANCP submitted to EU Commission. In addition, under existing feedingstuffs legislation, the outcome of certain controls is communicated bi-laterally to the relevant Commission services. To this end a comprehensive annual report is prepared covering all aspects of the previous year's FAIP.
- On-going supervision of the inspecting officers is carried out according to an annual schedule drawn up by the quality manager in consultation with the appropriate officers. The schedule aims to ensure that each inspection officer is subject to at least one annual supervisory visit by a superior officer for each inspection task over a three-year cycle. Some inspection tasks may be the subject of more than one supervisory visit over the three-year cycle depending on the perceived need for an additional supervisory visit covering any particular inspection task (e.g. extra duties because of new legislation) or the outcome of previous supervisory visits. Supervisory visits covering tasks additional to those indicated in the annual supervisory schedule may be carried out at the discretion of the supervisory inspecting officer.
- Supervisory visits will be prearranged with the inspecting officer and a supervisory inspection report is completed and retained on the officers training file. A copy of the Supervisory Inspection Report is given to the officer subject to the supervisory inspection. The supervisory inspection report will indicate whether, in the opinion of the supervisory officer, further formal training or a follow-up supervisory inspection is required in any particular inspection task or group of tasks. The quality manager ensures that such training or supervisory inspections are carried out as soon as possible.

## **Arrangements for the application of horizontal legislation across different sectors/sub-sectors**

The AFCG works in close co-operation with other Divisions of the Department such as;

- TSE and Animal By Products Division;

- ERAD (Veterinary Medicines)
- Veterinary Public Health (Zoonoses and Salmonella controls)
- Specialist Farm Services, Environment & Evaluation Division

DAFF's Veterinary Division, are responsible for animal related medicine, Salmonella and BSE controls. In the case of animal feedingstuffs, the sampling and analysis programme for medicated feed, salmonella in feed and in the case of BSE controls, the 'Total Feed Ban' is included in the Feedingstuffs programme of work. Meetings are held on an ad hoc basis between the Divisions to address issues as they arise. There is formal consultation each year prior to drawing up the inspection programme for the year to ensure the requirements of these Veterinary areas are met in the programme.

The Specialist Farm Services, Environment & Evaluation Division of DAFF remit includes the area of environmental policy. Feedingstuffs Division undertakes monitoring of phosphorus levels in feedingstuffs on behalf of this Division. Meetings are held on an ad hoc basis between the Divisions to address issues as they arise.

### **How specific control plans or programmes required by community legislation are integrated into the control systems for the relevant sectors or sub-sectors as appropriate**

- The control plans in place are those specified or required under the relevant community legislation relating to animal feedingstuffs.
- The annual inspection programme includes, where appropriate, inspections and analyses undertaken in respect of Commission Recommendations on coordinated monitoring programmes in the field of animal nutrition.

### **Measures to manage coordination between competent authorities with related responsibilities:**

The AFCEG also liaise with the following bodies as the need arise:

- Food Safety Authority of Ireland (FSAI)
- Environmental Protection Agency (EPA)
- The Department of Health and Children
- Customs
- Department of Marine and Natural Resources

The FSAI are responsible for contaminants in food. Feedingstuff Division staff draw samples of some bulk food grains such as wheat for milling, barley for brewing, oats for porridge outlets on behalf of FSAI and have them tested for Mycotoxins (specifically Aflatoxin and Ochratoxin A). This satisfies FSAI's requirements for controls to check out compliance with maximum levels laid down in Regulation 466/2001 for these contaminants in food. Meetings are held on an ad hoc basis between the FSAI and DAFF to address issues as they arise.

The Department of Health and Children, the EPA and the FSAI are involved in implementing legislation relating to GM in Ireland. There is ongoing communication between the AFCG and these bodies on GM feed issues.

The AFCG liaise with the customs authorities to ensure identification and control of imported feed. Importers are required to notify the Group in advance of importing animal feed. This pre-notification system is highly effective in ensuring that the appropriate controls are carried out on imports.

The Department of the Marine and Natural Resources has responsibility for the licensing and monitoring of fishmeal manufacture in Ireland. All other aspects of enforcement of the derogations for feeding protein of animal origin foreseen in the provisions laid down in Annex IV to Regulation (EC) No. 999/2001 are the responsibility of the AFCG .

## **Measures to ensure efficient and effective cooperation both within and between competent authorities**

### **Within the CA**

Feedingstuffs Division management monitor routine control activities. Progress on the FAIP is formally reviewed on a quarterly basis.

### **Between CA's**

Meetings are held on an ad hoc basis between the relevant Competent Authorities to address issues as they arise. There is consultation each year prior to drawing up the feedingstuffs inspection programme for the year to ensure the requirements of all relevant areas are met in the programme.

## **Measures to ensure all areas where coordination and cooperation are required both within and between competent authorities are addressed**

See previous points

## **Training arrangements**

- **Identification of training needs**

The training procedure is intended to include all aspects of both technical and administrative duties with regard to conducting inspections concerning animal feed. Each year both technical and administrative staff complete a role profile. As part of this exercise, officers identify their training needs for the year ahead. These training requests are examined by the AFCG management and the Staff Training and Development Unit of DAFF and where possible, appropriate training is organised.

- **Implementing training plan(s)**

Training and supervision of inspection staff is carried out at the following stages:

- Induction (for new staff)
- Supervised working period with experienced officers

- Continuation training to keep pace with developing legislation and technology.
- Supervision

A continuation training record is placed on the officers training file, together with details (agenda and dates) of the training.

Administrative staff generally benefit from ‘on the job’ training as well as attending courses on computer skills, legislation and effective writing organised by the Staff Training Unit.

- **Recording and evaluating training**

All inspection staff training records are maintained on file at central level. Records are kept for at least 5 years after an officer ceases to work in the Feedingstuffs Division. The success of training provided is assessed during a supervisory inspection and is based on the capacity of the Feedingstuffs Division to deliver on business plan commitments.

In general training needs are recorded for all staff in their Personal Development Plans and at annual review meetings. Those plans are reviewed twice each year at which time training provided is also assessed.

## **Contingency plans & mutual assistance**

- **Sectors/subjects/areas where contingency plans are in place**

Article 13 of Council Regulation (EC) 882/2004 on Official Controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules, outlines that Member States shall draw up operational contingency plans setting out measures to be implemented without delay when feed and food is found to pose a serious risk to humans or animals either directly or through the environment.

The AFCG has put in place a contingency plan for animal feed setting out the procedures to be followed and the measures to be taken in the event of a serious contaminant being detected in animal feed. Hazards requiring consideration and possible management may be identified following the Department’s routine controls on animal feed or may be notified by an external source, for example, through the EU Rapid Alert System for food and feed. The contingency plan outlines the responsibilities of officers involved in any contamination incident.

- **Scope of each plan**

The contingency plan is intended to cover the following activities in the field of animal nutrition:

- Importation of animal feed
- Storage of animal feed
- Manufacture and/or processing of animal feed
- Transport of animal feed
- Manufacture of compound feed
- Distribution of animal feed (wholesalers, retailers, etc)
- Use of animal feed on farms

- Final destination of contaminated animal feed

The contingency plan does not include measures to be taken following contamination of animal products for human consumption, animal disease control or the environment as such actions would be the responsibility of the Food Safety Authority of Ireland, Veterinary Division of DAFF or the Environment Protection Agency.

- **Body responsible**

Animal Feedingstuffs Control Group (AFCG), Department of Agriculture, Fisheries and Food

- **Arrangements for dissemination and training to ensure effective implementation including simulation exercises**

A co-ordination group made up of representatives from relevant Division's within the Department and also certain external agencies (FSAI) has been set up to provide technical advice when required. The plan ensures a focussed approach to the handling of each incident and allows for appropriate information exchange between all the relevant parties.

The contingency plan is reviewed and updated on a regular basis, for example, in the light of changes in personnel or following improvements identified after incidents or simulation exercises. In addition, the plan may be revised from time to time to incorporate harmonised rules for contingency plans where such are developed by the Commission in conformity with Regulation (EC) No 882/2004.

The contingency plan allows for simulation exercises where appropriate. It should be noted that heretofore this has not been necessary as the contingency plan has been tested on a number of occasions in 'live' situations.

**Arrangements for mutual assistance:**

The AFCG will provide the administrative assistance and cooperation in relation to animal feed controls referred to in Articles 34 – 39 of Regulation 882/2004 where appropriate.

## **Arrangement for audit of competent authorities**

### ***Internal audit***

For the purposes of meeting the legislative requirements of Regulation (EC) No. 882/2004, the DAFF has established an Internal Audit Unit (Agricultural Inspectorate Audit Unit – AIAU) to conduct internal audits on the effectiveness and suitability of official controls performed by DAFF personnel in a number of Divisions, including The AFCG, to ensure the verification of compliance with EU Feedingstuffs legislation. The AIAU derives its authority from the top management within DAFF.

The AIAU will put in place an annual programme of internal audits to be carried out by an internal auditor who will be independent from the functions being audited. The objective of the

AIAU will be to ensure that the implementation of the official controls for the feedingstuffs inspection programme is achieving the objectives of the relevant EU feedingstuffs legislation.

The conduct of audits will take account of the guidelines provided by the European Commission laying down the criteria for the conduct of audits under Regulation (EC) No. 882/2004 (Commission Decision 2006/677/EC) The strategy of the AIAU is to ensure that all major aspects of implementation of DAFF's feedingstuffs inspection programme are fully reviewed at an appropriate risk-based frequency over a period not exceeding five years.

**Measures ensuring that competent authorities take appropriate measures in the light of results of these audits**

The AIAU will make the results of these audits available to the Heads of Division within the AFCG Where findings and recommendations outlined in the audit report indicate the need for corrective, preventive or improvement action as applicable, the AIAU will propose that such actions be undertaken by management by a specific date. The completion and effectiveness of such actions will be verified as part of a subsequent audit to be carried out by AIAU.

The implementation of audit recommendations is the responsibility of line management within the AFCG. Where a serious feed safety issue is discovered during an audit, this evidence will immediately be brought to the attention of senior management in the Group.

**Measures ensuring that these audits are subject to independent scrutiny and are carried out in a transparent manner**

In order to preserve its independence, the AIAU does not engage in the functions of the AFCG thereby ensuring the provision of impartial advice to management.

The audit arrangements of the AIAU will be overseen by an Audit Monitoring Group composed of experts from outside DAFF. One of the functions of the Audit Monitoring Group is to provide advice to the AIAU through independent scrutiny of the audit findings of the internal audit in relation to the operation of the implementation of the Feedingstuffs Inspection Programme. The Audit Monitoring Group shall be independent in the performance of its functions. The Group and its members shall not be subject to the direction of any other persons in the performance of their duties and shall be appointed by top management within DAFF by virtue of their experience in the area of animal feedstuffs.

The head of the AIAU will report on a quarterly basis to the Audit Monitoring Group Committee and on a regular basis to Senior AFCG Management. These reports shall cover all aspects of the Unit's work and key findings of the audits undertaken.

A number of audit body practices will be in place to provide transparency to the audit process for relevant stakeholders. These include access to documented audit body procedures, consultation on planning of the audit programme and audit plans, publication of the audit programme, opportunity to comment on draft audit report, wide distribution of the final audit report, publication of auditee's comments on the draft report, publication of final audit report, publication of summaries of final audit reports and publication of follow-up audits.

## **External Audits**

The AIAU will cooperate with the FVO in any external audits, which this body may undertake.

## **Measures to ensure compliance with the operational criteria of Regulation (EC) No. 882/2004.**

- **Impartiality, quality and consistency of controls**

The AFCG management are committed to ensure that all staff have the appropriate qualifications and training to carry out the duties assigned to them. The aim is to ensure that inspection staff have the necessary skills and competence to carry out inspections. In addition, on-going supervision ensures that inspections continue to be carried out in a competent and uniform manner by inspection staff. Administrative staff are encouraged to attend appropriate training courses.

- **Staff are free from conflict of interest**

All staff working for DAFF complete a declaration and registration of interests form each year stating whether or not they have any conflict of interest when completing their duties e.g., where family members could benefit from decisions taken by an officer in the course of their work. It is the responsibility of the Heads of Divisions to draw up procedures to deal with any potential conflict of interests that are brought to light.

- **Adequate laboratory capacity**

Each year DAFF meet with the State Laboratory in January to outline their analytical requirements for the year. A further 2 meetings are held annually to monitor progress and to inform the laboratory of any additional analytical requirements. DAFF meet with other laboratories on an ad hoc basis. Following these meetings, management in the relevant laboratory is aware of the analytical requirements of the group.

- **Sufficient number of suitably qualified & experienced staff**

The Heads of the Divisions within the AFCG identify any areas where additional inspectorate or administrative staff are required and informs the Deputy/ Chief Inspector. Personnel Division is responsible for the allocation of staff. Appropriate training programmes are arranged for new staff.

- **Adequate facilities & equipment**

The system in place for review of business plans (twice yearly) includes a review of the resources, including laboratory facilities and equipment available.

## **Documented procedures are available**

The procedures manual for the Group details all relevant procedures

- **Adequate legal powers**

The Group, in consultation with Legal Services Division, ensure that all necessary legal powers are in place to ensure that staff can carry out the necessary controls.

- **Food & Feed business operators co-operate with staff performing official controls**

Since 1973 all EU legislation on feedingstuffs has been given effect under the European Communities Act, 1972, a legal instrument specifically enacted to give effect to the Treaties governing the European Communities and to enable the introduction of regulations giving effect to EC legislation.

Legal procedures are in place to ensure that staff has access to premises and documentation kept by feed business operators so as to enable them to accomplish their tasks properly. Authorised officers are also empowered to seize and detain where they have reasonable grounds for believing that a contravention of the feedingstuffs legislation has occurred.

There is provision under the various regulations on feedingstuffs for specific control measures at national level and penalties in the event of breaches. Under legislation where the activity is the subject of a Licence or the issue of an Approval / Registration status, such Licences or Approval's / Registrations can be withdrawn by the Minister of Agriculture and Food in the case of non-conformity with requirements. Financial penalties can only be applied following a successful prosecution in Court.

- **Records are maintained**

All inspection visits are documented and the records are maintained on the Inspection System for Animal Feed (ISPAF) system. All samples of feed taken and all laboratory sample results are recorded in 'Feed Main', an Access database. In both cases, these records are maintained indefinitely.

An annual report is submitted to the EU Commission.

## **Review and adjustment of the plan**

Each year, Feedingstuffs Division draws up a feedingstuffs annual inspection programme (FAIP). The result of controls from the previous one or more years is taken into account before finalising the programme. In addition, relevant EU Rapid Alert System for Food and Feed (RASFF) notifications throughout the previous year and any Commission Recommendations are taken into account.

Following on from this process a formal review of the animal feedingstuffs section of the single integrated multi-annual national control plan will be undertaken and it will be adjusted where necessary. Where adjustments are made then the revised plan will apply to the next period of its operation. The Commission and other interested parties will be informed of adjustments made as appropriate.





Analysis	Labo rator y	Method reference	Tolerance (reference if available)								LOD (mg/kg)
Avilamycin	H	Microbiological									5
Avoparcin	A	81/715/EEC									Not tested
Carbadox	A	1999/27/EC									1
Decoquinat	A	High Performance Liquid Chromatography									1
Diclazuril	A	1999/27/EC	10	10	10	10	20	20	40	40	Not tested
Dimetridazole	A	High Performance Liquid Chromatography									5
Flavophospholipol	A	78/633/EEC									Not tested
Halofuginone	A	93/70/EEC	10	10	18	18	20	20	40	40	Not tested
Lasalocid sodium	A	1999/76/EC	10	10	12.5	12.5	12.5	12.5	25	25	5
Maduramycin ammonium	A		10	10	18	18	18	18	40	40	Not tested
Methylbenzoate	A	93/117/EC									Not tested
Meticlorpindol	A										Not tested
Monensin sodium	A	High Performance Liquid Chromatography	10	10	12.5	12.5	12.5	12.5	30	30	0.5
Narasin	A	High Performance Liquid Chromatography	10	10	12.5	12.5	12.5	12.5	30	30	0.5
Nicarbazin	A	High Performance Liquid Chromatography	10	10	12.5	12.5	12.5	12.5	30	30	2
Nifursol	H	High Performance Liquid Chromatography									2
Olaquinadox	A	98/64/EC									Not tested
Penicillin V	J	Agar Diffusion Assay									5
Robenidine	A	93/117/EC	10	10	12.5	12.5	12.5	12.5	40	40	Not tested
Salinomycin	A	High Performance Liquid Chromatography	10	10	12.5	12.5	12.5	12.5	30	30	0.5
Spiramycin	A	84/425/EEC									Not tested

Analysis	Laboratory	Method reference	Tolerance (reference if available)								LOD (mg/kg)	
Tilmicosin	H	High Performance Liquid Chromatography										1
Tylosin	A	High Performance Liquid Chromatography										2
Virginamycin	A	High Performance Liquid Chromatography										2
Zinc Bacitracin		84/4/EEC										Not tested
Vitamins			Additive		Premixture		Mineral mixture		Compound feed			
			+%	-%	+%	-%	+%	-%	+%	-%		
Vitamin A	H	2000/45/EC	10	10	30	20	30	20	30	30	N/A	
Vitamin D	H	High Performance Liquid Chromatography	10	10	30	30	30	30	30	30	N/A	
Vitamin E	H	2000/45/EC	10	10	30	30	30	30	30	30	N/A	
Trace elements			Additive		Premixture		Mineral mixture		Compound feed			
			<u>+%</u>	<u>-%</u>	<u>+%</u>	<u>-%</u>	<u>+%</u>	<u>-%</u>	<u>+%</u>	<u>-%</u>		
Cobalt	A	Graphite Furnace Atomic Absorption	10	10	25	25	25	25	30	30	N/A	
Copper	A	78/633/EEC	10	10	20	20	20	20	-	-	N/A	
0-30 mg/kg									9mg/kg	9mg/kg		
30-100 mg/kg									30	30		
>100mg/kg									30mg/kg	30mg/kg		
Iodine	K	ICP-MS	10	10	20	20	20	20	40	40	0.05	

Analysis	Laboratory	Method reference	Tolerance (reference if available)								LOD (mg/kg)
Iron	A	78/633/EEC	10	10	25	25	25	25	25	25	N/A
Manganese	A	78/633/EEC	10	10	30	30	30	30	30	30	N/A
Selenium	A/F	Hydride Generation Atomic Fluorescence	10	10	15	15	15	15	25	25	N/A
Zinc	A	78/633/EEC	10	10	20	20	20	20	20	20	N/A
<b><u>Other additives</u></b>											
Antioxidants											
Flavourants											
Preservatives											
Binders											
Acidity regulators											
Enzymes											
Micro-organisms											
Bio proteins											
<b>Undesirable substances</b>											
Arsenic	A	Hydride Generation Atomic Absorption	Non-mineral feedingstuffs								0.2
	A (sub-contracted)	Inductively Coupled Plasma – Mass Spectrometry	Mineral feedingstuffs								0.04
Lead	A	Graphite Furnace Atomic Absorption	Non-mineral feedingstuffs								1.0

<b>Analysis</b>	<b>Laboratory</b>	<b>Method reference</b>	<b>Tolerance (reference if available)</b>	<b>LOD (mg/kg)</b>
	A (sub-contracted)	Inductively Coupled Plasma - Mass Spectrometry	Mineral feedingstuffs	0.2
Fluorine	K	Acid soluble fluoride detected with ion-selective electrode	Non-mineral feedingstuffs	0.2
			Mineral feedingstuffs	Not tested
Mercury	A	Cold Vapour Atomic Fluorescence	Non-mineral feedingstuffs	0.01
	A (sub-contracted)	Inductively Coupled Plasma – Mass Spectrometry	Mineral feedingstuffs	0.01
Nitrites	A			Not tested
Cadmium	A	Graphite Furnace Atomic Absorption	Non-mineral feedingstuffs	0.1
	A	Inductively Coupled Plasma – Mass Spectrometry	Mineral feedingstuffs	0.1
<b><u>Undesirable Products</u></b>				
Aflatoxin B1	A	High Performance Liquid Chromatography with Immunoaffinity clean-up	DIRECTIVE 2002/32/EC	0.0005 LOQ
Ochratoxin	A	High Performance Liquid Chromatography with Immunoaffinity clean-up		0.0002 LOQ

<b>Analysis</b>	<b>Laboratory</b>	<b>Method reference</b>	<b>Tolerance (reference if available)</b>	<b>LOD (mg/kg)</b>
Fumonisin	I	High Performance Liquid Chromatography with Immunoaffinity clean-up		0.020 LOQ
ZEA	I	High Performance Liquid Chromatography with Immunoaffinity clean-up		0.006 LOQ
DON, T2, HT2, Nivalenol	I	GC/MS(Trichothecene Analysis)		0.010 LOQ
Hydrocyanic acid	A			
Free gossypol	A			
Theobromine	H	High Performance Liquid Chromatography		1.0
Volatile mustard oil	A			
Vinylthiooxazolidone (Vinylloxazolidine thione)	A			
Rye Ergot ( <i>Claviceps purpure</i> )	A	LC/MS		0.005

Analysis	Laboratory	Method reference	Tolerance (reference if available)	LOD (mg/kg)
Weed seeds and unground and uncrushed fruit containing alkaloids, glucosides or other toxic substances separately or in combination including: (a) <i>Lolium temulentum</i> L., (b) <i>Lolium remotum</i> Schrank., (c) <i>Datura stramonium</i> L.	A			
Castor oil plant ( <i>Recinus communis</i> )	C			
Crotalaria spp.	C			
Aldrin singly or combined with dieldrin	C			
Dieldrin expressed as dieldrin	C			
Campheclor (Toxaphene)	C			
Chlordane (sum of <i>cis</i> - and <i>trans</i> - isomers and of oxychlordane, expressed as chlordane)	C			
DDT (sum of DDT-, TDE- and DDE-isomers, expressed as DDT)	C			

Analysis	Laboratory	Method reference	Tolerance (reference if available)	LOD (mg/kg)
Endosulfan (sum of $\alpha$ - and $\beta$ - isomers and of endosulfan sulphate expressed as endosulfan)	C			
Endrin (sum of endrin and of $\delta$ -keto-endrin, expressed as endrin)	C			
Heptachlor (sum of heptachlor and of heptachlorepoxyde, expressed as heptachlor)	C			
Hexachlorobenzene (HCB)	C			
Hexachlorocyclohexane (HCH)	C			
$\alpha$ -isomer	C			
$\beta$ -isomer	C			
$\gamma$ -isomer	C			
<b>Botanical impurities</b>				
Apricot <i>Prunus armeniaca</i> L.	B	Microscopic		

Analysis	Laboratory	Method reference	Tolerance (reference if available)	LOD (mg/kg)
Bitter almond <i>Prunus dulcis</i> (Mill.) D.A. Webb var. <i>amara</i> (DC.) Focke (= <i>Prunus amygdalus</i> Batsch var. <i>amara</i> (DC.) Focke)	B	Microscopic		
Unhusked beech mast <i>Fagus silvatica</i> L.	B	Microscopic		
Camelina <i>Camelina sativa</i> (L.) Crantz	B	Microscopic		
Mowrah, bassia, madhuca <i>Madhuca longifolia</i> (L.) Macbr. (= <i>Bassia longifolia</i> L. = <i>Illipe malabrorum</i> Engl.) <i>Madhuca indica</i> Gmelin (= <i>Bassia latifolia</i> Roxb. = <i>Illipe latifolia</i> (Roxb.) F. Mueller)	B	Microscopic		
Purghera <i>Jatropha curcas</i> L.	B	Microscopic		
Croton <i>Croton tiglium</i> L.	B	Microscopic		
Indian mustard <i>Brassica juncea</i> (L.) Czern. and Coss. ssp. <i>integrifolia</i> (West.) Thell	B	Microscopic		

<b>Analysis</b>	<b>Laboratory</b>	<b>Method reference</b>	<b>Tolerance (reference if available)</b>	<b>LOD (mg/kg)</b>
Sareptian mustard <i>Brassica juncea</i> (L.) Czern. and Coss. ssp. <i>juncea</i>	B	Microscopic		
Chinese mustard <i>Brassica juncea</i> (L.) Czern. and Coss. ssp. <i>juncea</i> var. <i>lutea</i> Batalin	B	Microscopic		
Black mustard <i>Brassica nigra</i> (L.) Koch	B	Microscopic		
Ethiopian mustard <i>Brassica carinata</i> A. Braun	B	Microscopic		
<b>Dioxins</b>	A	High Resolution Gas Chromatography Mass Spectrophotometry		≤ 0.05 ng/kg
<b>Dioxin-like PCBs</b>	A	Gas Chromatography Mass Spectrophotometry		≤ 0.05 ng/kg
<b><u>Microbiological</u></b>				
Salmonella	E	ISO/FDIS 6579		one organism in 25 grams
<b>Directive 99/29</b>				

<b>Analysis</b>	<b>Laboratory</b>	<b>Method reference</b>	<b>Tolerance (reference if available)</b>	<b>LOD (mg/kg)</b>
Meat and bone meal	B/G	Microscopic*		
Fishmeal	B/G	Microscopic*		
<b>Regulation 1829/2003</b>				
Presence of GMO's	L	Qualitative and Real Time PCR	Thresholds as per legislation (Regulations (EC) No. 1829/2003 and 1830/2003).	Dependent on Matrix and on ingredient level
Level of GMO's	L	Real Time PCR		

\* The method used for the detection of processed animal protein (PAP) in feedingstuffs is based on that described in Commission Directive 2003/126.