

# Feed Hygiene Explained

## Case studies—Feed and animal welfare

### Feed causes animals to suffer and die

BSE and FMD may have become the infamous reminders of what happens if we give our animals unsafe feed, but the ongoing threat of diseases caused by feed is why local authority officers work every day with farms, feed mills and importers to identify and tackle cases quickly. Scottish Borders Officers were quick to raise the alarm when a local vet became concerned about two farms where over 100 lambs had died and the remainder were failing to thrive. They recognised that the milk replacer could be a potential source of the suffering and worked with colleagues at Northumberland County Council, linking the problem to many other farms in the area where young lambs were suffering and dying. Extensive sampling was undertaken by both local authorities, which eventually indicated that traces of Botulism were present in an imported batch of milk. In fact, the bacteria could have been responsible for one of the farmers being hospitalised earlier in the year. Ultimately the local authority could trace the remainder of the batch to remove further risk to animals. Botulism is caused by a powerful bacterium that paralyses the muscles of the animal.



### Did you know?

Did you know that our waste food is still used in animal feed? Meat protein may be banned from farmed animal feed, but our waste bread, cereals, dairy products and the by products from food manufacturing regularly make up feed given to farm animals. It is vital that checks are in place not only to make sure this feed is not contaminated by meat, but also to ensure that it remains in free from packaging and is kept in state that prevents infestation and dangerous bacteria caused by poor hygiene. Unfortunately these risks often become a reality for feed officers. **See the case studies on page 2.**

### Linking poor feed hygiene to animal welfare issues

It is not uncommon for a business experiencing problems with one area of regulation to have issues across the board and unfortunately when farmers fail to comply with the law it can often lead to animals suffering. This was the reality for a farm in Suffolk, where serious issues with feed hygiene linked directly to the suffering of animals. Suffolk County Council received a report from the RSPCA that cattle and sheep at the property were living in unsuitable barns with deep muck and slurry. When the local authority officers visited they found open bags of feed with rats crawling in them, slurry and faeces nearby, troughs and water buckets contaminated with waste. Animals were found to be caused unnecessary suffering and a feed improvement notice was issued because of the potential for livestock to face further suffering from contaminated feed and the risk this would pass on to human food. The farmer was invited in for interview for animal welfare offences and Suffolk are revisiting to ensure the feed improvement notice is continuing to be carried out. Experiences in Suffolk show that feed hygiene issues often go hand in hand with animals suffering.

### Prize cow dies from contaminated feed

Staffordshire County Council received a complaint from a farmer alleging that animal feed was responsible for the death of one of his pedigree Friesians. He saw an advert in a national farming publication for waste bakery products being sold as feed, ordered it and within a week one of his prize Friesians worth over £5000 had died. After visiting the farm, it was quite clear that the feed contained large pieces of packaging from the original food product, which the expert veterinarian concluded presented an immediate risk to animal health. After further investigations, it was clear that there was a fundamental problem with separation undertaken by the feed business. Staffordshire County Council issued a caution to ensure the immediate threat to animals was stopped and steps taken to prevent it occurring in future.

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Protecting Consumers  
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## Case studies—Our waste food as animal feed

### Feed store infested with rats and mice

Northamptonshire County Council acted on intelligence about the condition of a feed business depackaging and processing surplus food into animal feed. Officers discovered the feed business had been in administration for over six weeks and the owner of the site had been permitted to dispose of remaining feed. There was 17 tonnes of waste, bakery waste, crisps, cereal waste, sweets and chocolate, sachets of sauces and glass jars of ready made sauces waiting for processing and 10 tonnes of processed feed awaiting collection. The whole premises smelt of urea and there was an excessive amount of rat and mice faeces, which was unsurprising as there were hundreds of mice and rats running around the site. It was evident all controls to ensure the safety, hygiene and traceability of feed material on site had ceased. The administrator was simply not aware of the very real risk to both animals and humans if this material entered the feed chain.



Officers served an emergency prohibition notice to prevent the feed from being distributed and traced feed that had already been delivered to stop it being used on farm. Northamptonshire County Council also worked at a senior level with the administrators to persuade them to voluntarily surrender the feed and consign it for bio digestion. It was agreed not to take further action it was extremely unlikely that similar events would take place again and consideration was given to the positive cooperation of the business and the significant cost they had already endured to dispose of the feed material.

### Feed mill closed because risk too great **CLOSED**

Derbyshire County Council visited a local feed mill that processed bakery and fruit and vegetable waste into animal feed and was looking at expanding into a national operation. They discovered that the mill had no cleaning or hygiene systems in place and as result mould was everywhere, rubbish was accumulating, there was clear rodent infestation and the forklift truck used to move feed around had never been cleaned. Derbyshire issued an Emergency Feed Business Prohibition Notice, which was subsequently turned into a court order. Ultimately the business did not re open and the risk it presented to animals and humans was removed.

### Waste collector operating as a feed business

After receiving complaints from local farmers about levels of packaging in their feed, Norfolk County Council traced the problem to a waste collector that was taking everything from cars, through to recycling and waste food. The waste food they were processing was subsequently traced to a food manufacturer who was oblivious that their waste was being used in animal feed, in fact they were paying the company to take away all their waste in bulk and therefore there was no separation of different waste types or management of the risks associated with feed production. Officers began working with the food business and the waste collector to develop systems that would enable both to continue operating, while removing the risks to both animal feed and the food chain. The food business embraced the new approach, however, the waste collector did not maintain or follow the processes designed to keep the feed safe. Ultimately, the food business became so concerned about their reputational threat of a feed incident being linked back to them that they arranged for the waste to be collected by a different company. The waste food is still reaching animals as feed, but no complaints are being received from farmers and the risk has been eliminated.

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## Case studies – Helping feed businesses



### Reducing risks and saving businesses money

Norfolk County Council works with feed businesses in their area to ensure that risk management and sampling systems are targeted at the right areas and are cost effective for the business. One local company was spending a small fortune on sampling and analysis because their feed was destined for high value competition horses that have to remain drug free in order to compete. The manufacturer had to guarantee that banned substances would not appear in their feed, with the list of substances only growing as customers became aware of new threats. Local authority officers took the time to pursue senior level meetings where it could be explained that many samples were being taken for contaminants that simply could not be there because of feed and food processing standards. Together, the local authority and feed business produced a new sampling programme taking less samples but in the right areas. The revised approach saved the business money, which they ploughed back into more targeted samples for their customers.

### Reducing burdens for responsible businesses

With the support of the FSA, the NTS Feed Delivery Programme has helped to cut red tape for farm assured and reputable feed businesses. Agreements have been put in place with farm assurance schemes at a national level to ensure that local authorities receive details of farm assured feed businesses in their area, which means their inspection frequency is dramatically reduced. Local authorities continue to work with the schemes to share information on trends and specific cases to really explore the role of that assurance schemes can have in regulation. The potential to cut red tape is not restricted to assured feed businesses and the NTS Feed Delivery Programme has put a system in place that means feed businesses with a history of compliance can earn inspection holidays. Local authorities instead carry out 'alternative' checks, which can make use of intelligence, data, telephone conversations or sampling. The formalisation of this approach not only cuts red tape in a consistent way for businesses, but also puts clear parameters in place as to when a feed business may need to return to routine inspections.



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## The NTS Feed Delivery Programme

### Identifying risks and responding to concerns

The NTS Feed Delivery Programme works with local authorities and the FSA to identify and investigate potential threats to the safety of the UK feed chain. Last year the NTS Programme funded two projects, one looking at the disposal of surplus food and the other measuring the carryover of additives and veterinary medicines into non target feed. Both projects have been extended to increase our understanding of the risks and provide the evidence for further intervention.

#### What is happening to surplus food?

Some initial work was carried out in London by ALEHM (Association of London Environmental Health Managers) which gathered intelligence that significant numbers of food retailers stock food on a 'sale or return' basis. It became apparent that many food businesses do not know what happens to this surplus food after collection, and concerns were raised that some of this food could be entering into the animal feed chain when not appropriate. In order to gain a broader picture, additional work was conducted by a number of other local authorities around England. This examined the waste food chain, from retailer to point of final disposal to establish if any surplus food was entering the animal feed chain.

It was found that 'sale or return' models are common, with the rate typically being 60-70% among small food retailers such as convenience stores, newsagents and petrol stations. However, the most common method of waste food disposal is to landfill. It was found that there is not widespread disposal of waste food from sale or return arrangements into the animal feed chain.

The project showed a general lack of understanding among retailers regarding waste disposal and traceability requirements. Some regions/authorities did not feel there was any evidence to suggest that there may be underlying widespread issues with disposal of waste food for animal feed, however some participants did have concerns. There is a worry that the picture identified may just reflect a small snapshot of a larger more widespread problem, so work on this area will continue this year.

#### Feed additives

Our initial research into the levels of feed additives and veterinary medicines in non target feed identified that a large percentage of those feed products sampled potentially exceeded the maximum amounts laid down in European law. This preliminary investigation of feed additive carryover is concerning and along with the feedback received from local authorities it suggests that there are systematic issues that need to be improved within the feed mills involved. At the very least, the results are an indication that the work under this project needs to continue in order to gain further quantitative data, but also to help feed businesses improve processes and ensure that the ongoing checks made by industry are able to detect excessive carryover.

Local authorities have already provided additional feedback on the positive steps already taken by feed businesses to address the excessive carryover levels. This includes fundamental changes such as a new cooler being installed, amending flush procedures and introducing a new risk management matrix. It is vital that this follow up work to support feed businesses can continue.

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#### Further information

NTS Feed Delivery Programme— <http://www.nationaltradingstandards.uk/work-areas/feed-hygiene-delivery/>

Food Standards Agency (FSA) - <http://www.food.gov.uk/business-industry/farmingfood/animalfeed>

Join the National Agriculture Community Knowledgehub for local authority feed officers at <https://khub.net/>

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