

On-farm mixing – the Feed Hygiene Regulation

Guidance on HACCP-related requirements for farmers

Introduction

1. The following requirements on HACCP (Hazard Analysis of Critical Control Points) plans are additional to those set out in Annex I of EC Regulation 183/2005 on feed hygiene, which apply to primary producers. Further guidance on the application of Annex I can be found in the Assured Food Standards *Code of Practice for On-Farm Feeding* -- see

http://assurance.redtractor.org.uk/resources/000/576/439/Industry_Feed_Code_of_practice_April_2010.pdf

2. There is separate guidance for farmers on the mixing of additives and premixtures with feed materials and compound feed on their own holdings, which can be found at

<http://www.food.gov.uk/multimedia/pdfs/guidance/feedhygieneadditives.pdf> It should be noted that the guidance in this document does not apply to the mixing and use of specified feed additives (e.g. coccidiostats and histomonostats), which is covered by separate guidance available from Defra's Veterinary Medicines Directorate at

<http://www.vmd.defra.gov.uk/pdf/vmgn/VMGNote17.pdf>

HACCP

3. Livestock farmers (primary producers) who buy in feed additives and premixture products (except silage agents) and mix them directly with feed materials (e.g. forages, cereals) must apply the principles of HACCP and comply with Annex II of EC Regulation 183/2005 on Feed Hygiene. This is because of the higher risks which are considered to be associated with this activity, as many additives (vitamins, trace elements) are subject to maximum incorporation rates in finished feeds -- excessive levels of certain additives may have implications for both animal health and the health of consumers of animal products. In addition to helping ensure feed and food safety, good hygiene and accurate mixing of feed can have performance benefits for animals.

4. HACCP is a systematic approach to safety management. In addition, Annex II of Regulation 183/2005 includes more specific requirements relating to facilities, equipment, storage and record-keeping, etc.

5. A full HACCP study and system will analyse every step of the feed activities on farm to identify hazards that may occur and how best they can be controlled, e.g. by Critical Control Points (CCPs). Some farmers may wish to consider this approach. However, the EC Regulation recognises that in some cases it is not possible to identify CCPs, but that it is necessary to adopt good practices.

Guidance

6. This guidance focuses on the requirements of Annex II of the Regulation as they apply to livestock farmers mixing feed additives and premixtures on their own holdings.

7. The left-hand column in the following table gives the legal requirements which must be met. The italicised text in each box in the left-hand column is based on Annex II of the EC Regulation. The right-hand column gives advice on best practice, although you are not required to follow this in order to comply with the law.

Legal requirement, legal reference and description of legal requirements. By law, you must comply with these requirements	Advice on best practice. This may help you comply with the law, but you are not required to follow it
FACILITIES AND EQUIPMENT	
<i>Facilities and equipment used for mixing additives and premixtures must undergo appropriate and regular checks, in accordance with pre-established written procedures (Annex II, Facilities and Equipment section, paragraph 3)</i> • Keep feed machinery clean, in a serviceable condition and free from accumulated waste, checking by visual inspection on a regular basis. • Retain and follow manufacturers' instructions to adequately maintain and clean equipment. Where such instructions are not available, briefly document the cleaning and maintenance measures taken. • Keep a record of all cleaning and maintenance carried out.	• Records of equipment cleaning may simply be a case of retaining a copy of a service company's checks.
<i>All mixers used in the manufacture of feed must be appropriate for the range of weights and volumes and capable of manufacturing homogeneous mixtures and dilutions (see Annex II, Facilities and Equipment section, paragraph 3(b))</i>	• It is recommended that homogeneity tests are carried out at least annually and the results retained until the next check. • Even if the machinery is suitable for the feed mixes produced, it needs to be operated properly to achieve a homogeneous mix.
SCALES AND METERING DEVICES	
<i>All scales and metering devices used in the manufacture of feed must be appropriate for the range of weights or volumes to be measured and be tested for accuracy regularly (see Annex II, Facilities and Equipment section, paragraph 3(a))</i> • Keep a record of all checks carried out.	• Records should be kept for at least a year.

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PERSONNEL	
<i>Personnel must have sufficient skills necessary for the mixing of products containing additives and premixtures (see Annex II, Personnel section)</i> • Ensure that personnel engaged in mixing feed receive training by instruction, e.g. by more experienced staff or by the suppliers of the equipment.	• Keep records of all training provided. (Records should be kept for at least a year.) • Ensure that personnel practise the instructions they have received.
PRODUCTION	
<i>Mixing operations must be carried out according to pre-established written procedures and instructions (see Annex II, Production section, paragraph 2)</i> • Maintain a documented procedure or instructions for mixing operations. • Observe instructions for use of additives and premixtures, e.g. the incorporation rates stated on the labels. • Keep records of feed formulations, including dates of manufacture.	• Instructions for mixing operations may incorporate equipment manufacturer's instructions. • Take a representative sample of the finished feed each time a new batch of mixed feed is produced. • Keep samples of dry feeds for four weeks.
<i>Measures must be taken to avoid any cross-contamination, e.g. from one batch to another (see Annex II, Production section, paragraph 3)</i>	• Where formulations change, thoroughly clean the mixing equipment and flush some feed material through the system.
STORAGE	
<i>Additives and premixtures shall be stored separately from processed feeds and feed materials to avoid cross-contamination (see Annex II, Storage and Transport section, paragraph 1)</i>	• Store additives and premixtures in a separate building from processed feeds and feed materials. • If that is impractical, ensure that additives and premixtures are stored in bags and there is sufficient separation to avoid cross-contamination.
RECORDS	
<i>Records must be kept of the name and address of additive and premixture suppliers and of the quantities of additives and premixtures used, with batch numbers recorded (see Annex II, Record-Keeping section, paragraph 2(b)(iv))</i> • Keep relevant documents, e.g. feed labels, invoices, receipts, delivery notes. • Make records available to enforcement authorities to demonstrate compliance with the requirements.	• Some farmers may wish to draw up a formal HACCP plan. However, it may be sufficient to keep all records and documents mentioned in this guidance in a single place or keep a note of their whereabouts. • Keep records for at least a year.