

UFAS update

THE NEWSLETTER OF THE UNIVERSAL FEED ASSURANCE SCHEME



Welcome

Much has changed over the past 12 months. In spite of the pandemic, the UK and Irish feed industry has done an excellent job of keeping livestock fed whilst also dealing with changing requirements and guidance, disruption to supply chains, and staff shortages. We are taking the opportunity to review what we have learned over the past year, and how we can deliver an improved UFAS scheme going forward.



Simon Williams

Technical Manager for AIC Services

AIC Schemes – the route back to onsite audits

Over the last year, UFAS audits have been carried out remotely. This has worked well, thanks to the hard work by participants, auditors and certification bodies. However, it is clear that audits are better carried out with some element of onsite inspection and face to face contact in most circumstances. AIC is cautiously plotting a course back to onsite visits, whilst ensuring that all the benefits of remote auditing technology are retained. The steps in the process will be:

- 1st June – Routine onsite audits resumed, at the discretion of the participant, auditor and certification body. The audit may be carried out fully onsite or as a hybrid, and the participant will need to inform the CB and auditor of any site requirements (e.g. visitors being asked to take a lateral flow test). A fully remote audit will also remain an option.
- Autumn 2021 (date TBC) – Onsite audits will become the default, but with participants able to request a remote or hybrid audit if needed. Individual circumstances, along with any regional or national restrictions, will be taken into account.
- Start of 2022 – All audits planned to include an onsite element where there is a production or storage operation. For invoice-only merchants or other businesses where there is no feed present, fully remote audits may continue, subject to the discretion of the certification body.

This plan to return to onsite audits will be regularly reviewed and dates confirmed in due course. The process may be paused or changed dependent on the pandemic.

Certification bodies retain the discretion to carry out unannounced audits at short notice to ensure feed and food safety.



Remote Audits, the AIC Portal and joining the UFAS Review Group

AIC spoke to Hannah Reed, Group Quality Assurance Manager for Duffields, about the past 12 months of UFAS audits and her new role as a member of the UFAS Review Group.

AIC: Duffields were amongst the first UFAS sites to have a remote audit last year. How did you find that first experience, and what have you learned about the process since?

HR: At the time of the first remote audit, we were all adjusting to a new way of working at home. Preparing for an audit remotely initially brought some challenges. However, the pre audit document submission list was very comprehensive and made the process systematic for both me and my colleagues onsite. I have now completed 6 remote UFAS audits in the last 12 months.

AIC: How did you find uploading documents in advance of the audit? Has the process improved since?

HR: Uploading of documents is a straightforward process and allows me to check I have all the documents the auditor needs ahead of the audit date. I like that you can add the additional notes for the auditor to explain what you are trying to show within the documents. The changes made to the portal since the beginning have improved the process further.

AIC: Do you believe there are advantages to pre-submission of information?

HR: I am a strong supporter of pre-document submission ahead of the audit. It makes the audit a more focused and productive day for both the site and the auditor. Far better than spending large chunks of time looking at the top of the auditor's head! I hope this new way of auditing remains.

AIC: How have you found the process of uploading corrective action evidence onto the portal?

HR: This process works really well. Having the space to add an explanation makes it far easier than emailing documents. It also allows you to see when the corrective actions have been accepted.

AIC: You have recently agreed to join the UFAS Review Group. Why do you think it is important for a company like Duffields to be represented on the group, and what do you hope to contribute to the scheme through your involvement?

HR: I was really pleased to be asked to join the UFAS Review Group. Duffields are a multi-site company across the East and Southwest of England. I feel it is important that independent feed companies are represented on the UFAS platform, and I hope my multispecies experience will be an asset to the Review Group.



Earned Recognition Renewal of Memorandum of Understanding (MoU)

UK feed and food authorities grant Earned Recognition to scheme participants who have demonstrated robust systems for legal compliance. The current Earned Recognition MoU has been in place since 2016 but updates are planned following changes to the Feed Law Code of Practice and the new competency framework. The basic principles of the agreement will remain the same, but the review will look at the type and frequency of data supplied to the authorities, whilst also strengthening the requirements for data sent to AIC. Everyone involved in Earned Recognition over the past few years has agreed on its great success. We are now seizing the opportunity to strengthen and streamline the process further.

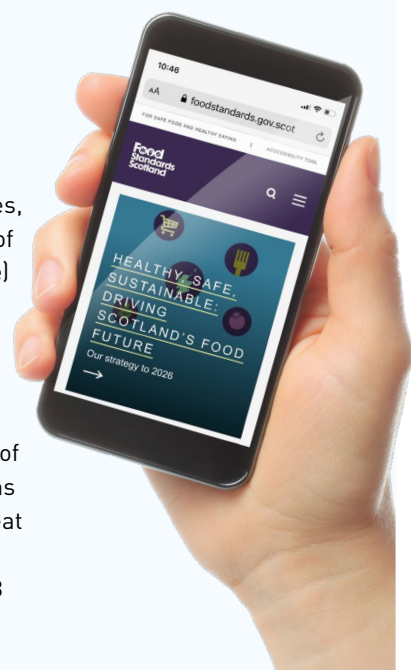


Food Standards Scotland

Food Standards Scotland (FSS) became a signatory to the Earned Recognition MoU in 2016. For a long time, FSS has intended to introduce a centralised approach to feed law enforcement for consistency across different regions. This is now enshrined in Scottish Law. Since 1st April 2021, FSS are the sole competent authority for feed hygiene in Scotland. This means there is now a single point of contact for all Scottish feed businesses, via feed@fss.scot and online registration and approval application forms. In some areas of Scotland, inspections will still be carried out by the local authority (or a neighbouring one) whilst others will have directly employed FSS inspectors. Regardless of who delivers the inspection, the planning and reporting will all be managed centrally by FSS.

Earned Recognition and EU Exit

All feed authorities within the UK are fully committed to the concept and implementation of Earned Recognition. However, the content of the Trade and Cooperation Agreement means that the feed industry in Northern Ireland will continue to follow EU legislation whilst Great Britain (England, Scotland, and Wales) is likely to gradually diverge from this. As a result, it has been agreed with UK authorities that AIC schemes will be benchmarked against GB and EU legislation to ensure that compliance across the UK can be demonstrated.



Remote auditing in a pandemic – the Certification Body view

Forbes Fyfe, Feed Schemes Technical Manager at Lloyd's Register gives his thoughts on auditing over the past 12 months.

AIC: How have LR been completing audits during the pandemic?

FF: We have been conducting hybrid audits for UFAS, combining an off-site review of documentation and records with a remote physical site assessment.

How many hybrid audits have been conducted?

Since 1st March 2020, the UFAS auditors have done 994 scheduled audits. 809 of these included a remote element – just over 80% of the total.

Are hybrid audits as effective as physical audits?

Analysis of trends in non-conformances suggest they are effective, but in truth we didn't know this when we started them in April 2020. We had all become very used to the idea of an annual audit with an auditor on site, so moving to hybrid audits was a substantial change. Even allowing for the dual impact of the launch of UFAS 2020 and the move to hybrid audits, all trends are consistent for merchants and compounders, and indeed individual participants.

Why do you think this is the case?

It was a team effort. We have a really strong team of auditors who all rose to the challenge within a very accelerated timeline. That's a testament to their knowledge, ability, and professionalism. The same must also be said about UFAS participants who have, without exception, been willing to engage with us and ensure they are uploading required

information in advance of the audit while coping with the practical realities of remote inspections in their businesses.

Are you seeing the same outcomes to audits?

There has inevitably been a shift in focus. Pre-submission allows auditors more time to review information, which means that analysis of the more technical areas such as HACCP has become more detailed and nuanced. In the long run, this will add more value for participants as any non-conformances would tend to be more detailed as well. While a remote inspection can't replicate the sensory element of being on site, it still allows our auditors to establish whether there is sufficient evidence that participants are operating to levels of compliance necessary to maintain feed safety.

Do you think there is a place for hybrid audits in the future?

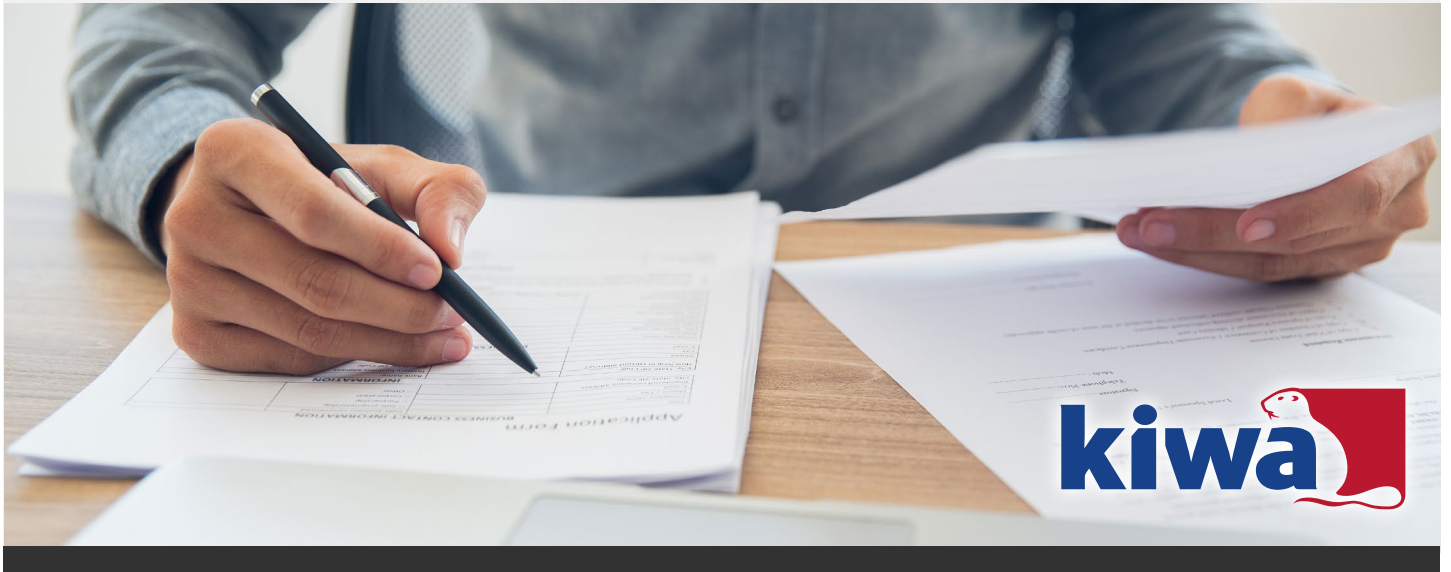
Absolutely. Pre-submission of information in advance of audit has been a significant change, not just for UFAS but also for many of the other schemes we manage. Looking further ahead, I think there is real opportunity for discussion about how as an industry we can apply the experiences and lessons from 2021/22 to the future.



UFAS Certification Body Contract

AIC contracts a single certification body to deliver each of its schemes, conducting a periodic tendering process to do so. The tender process for UFAS was just starting at the same time as the pandemic. Due to the workload this created, AIC took the decision to pause the process and extend the contract with Lloyd's Register for 12 months. In late 2020, the process was restarted. Following submissions from a range of certification bodies and a round of remote interviews

and presentations, the decision was reached to award the contract to Kiwa Agrifood, who also certify TASCC, FEMAS and FIAS on behalf of AIC. This will commence on 1st March 2022. AIC will work closely with LR and Kiwa to ensure that the transition is as seamless as possible and causes minimal disruption to participants. For now, everything will still be managed by LR. As we approach the transition date, AIC will confirm the new contact arrangements for participants.



Maintaining compliance in challenging times

As if a global pandemic was not enough of a challenge for the feed industry, the UK and Ireland faces additional controls and paperwork following the UK leaving the EU, which has the potential to disrupt supply chains. The primary aim of UFAS is to ensure feed safety and legality, but often risks to these originate in supply chain problems and the imperative to keep animals fed.

To add further complexity, as time passes legislation in Great Britain, Northern Ireland and the Republic of Ireland is likely to diverge. An ingredient (e.g. an additive) may be legal for some sites/ businesses but not others, due to their location and/or that of their customer.

In spite of the difficulties potentially being faced in sourcing some ingredients, it is important that UFAS participants carefully check the assurance status of suppliers (and maintain their supplier lists accordingly) whilst also ensuring that feed ingredient specifications are reviewed and, where necessary, formulations and labels updated to maintain legal compliance.



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