

UFAS update

THE NEWSLETTER OF THE **UNIVERSAL FEED ASSURANCE SCHEME**



Welcome

Welcome to the Winter 2019/20 UFAS Update which contains important information about the implementation of UFAS 2020, including details of changes to the Standard and the new Short Notice and Unannounced audit regimes.

As ever, I hope that you find this newsletter useful, and if there are any topics you would like to be covered in future editions, please get in touch using the contact details on the back page.



Simon Williams
Technical
Manager, AIC

UFAS 2020 published

Following the public consultation earlier in the year, the revised UFAS 2020 Standard has now been published.

AIC is very grateful for all the comments received, which were helpful in assisting the UFAS Review Group to finalise the wording. Due to the nature of some of the feedback received, a decision was made to delay the publication of the Standard, and also the implementation date, with audits **now starting on 2 March 2020**.

Following the consultation, the overall structure and the fundamental principles of UFAS 2020 are unchanged but some small changes were made. Those changes are highlighted in this newsletter along with other important updates on the scheme scope and content. A more detailed description of the changes is available to download from the AIC website.

As a further aid to compliance, changes are also highlighted in the Standard itself:

NEW indicates that the requirement has no direct equivalent in the outgoing UFAS 2016 Standard

UPDATED indicates that the detail or the intended outcome of the requirement has changed

All other clauses remain largely unchanged in terms of required outcomes, but the wording may have been revised.



Inside

HACCP

Approval of Suppliers and Feeds

Own Transport

UFAS Scope changes

Merchant Definitions

New Audit regime

Updated Fees

Sampling & Testing Guidance

Salmonella Guidance

Controlled products





HACCP

For several years, HACCP has been an area that has consistently seen a high number of non-conformances, a pattern which is also observed by the Competent Authorities during their visits to feed businesses.

To assist participants in complying with this key legal requirement, UFAS 2020 has a greatly expanded HACCP section (B 1) with the aim of providing more detail of the required outcomes at each stage of the HACCP process. In addition to this, AIC have been developing an online HACCP training course which will be launched soon and, upon completion, users will receive a Level 2 HACCP qualification from the Chartered Institute of Environmental Health, one of the leading awarding bodies in the food safety field.

Approval of Suppliers and Feeds

UFAS 2020 sees a new structure to the requirements for approval of suppliers and feeds.

Supplier Approval

One of the fundamental requirements of the UFAS scheme over the past 15 years has been sourcing feeds and ingredients from assured suppliers. In more recent versions of UFAS, requirements to use certified storage and transport companies were introduced. In UFAS 2020, an additional requirement has also been introduced to consider potential feed safety implications from the selection of other suppliers of services, such as pest control or maintenance activities.

Approval of Feeds

In addition to sourcing feeds from assured suppliers, UFAS participants also need to approve each individual feed prior to incorporation into their products or sale to customers.

UFAS 2020 recognises that the level of detail needed in order to do this varies, depending on whether the feed is intended for incorporation by the participant, or whether it is to be sold in the same form as it is purchased. In the latter case, there should be sufficient information on a legally compliant label to allow the feed to be sold safely and legally. If a feed is being sourced as an ingredient for incorporation by a UFAS participant, it is likely that more information will be required from the supplier to ensure that it is used correctly and safely in the process. To this end 'Feeds for Incorporation' and 'Feeds for Merchanting' have separate and different requirements in the new Standard.

Own Transport

For over a decade UFAS has referred to the transport requirements in TASC and these have then been assessed during UFAS audits. For UFAS 2020 the decision has been made to incorporate the relevant TASC requirements directly into the UFAS Standard.

The aim of this change is to make transport requirements within UFAS more transparent and to avoid participants having to refer to a separate document.

The structure of the new Own Transport section in UFAS 2020 (F9) also makes a clear distinction between participants carrying feeds/ ingredients on their own behalf and those who provide transport services to third parties. Participants

who offer bulk transport services to other businesses must make the certification body aware of this activity and have 'third party transport' included in their scope.

To ensure that transport requirements remain consistent across AIC schemes, there will be an interim update to the UFAS Transport section when the new TASC 2021 Standards are published towards the end of 2020.

Merchant Definitions

UFAS 2020 also sees a change in the definitions of types of merchant businesses. The definition of 'Invoice Only' merchants remains unchanged, but the previous 'Country' and 'Full' merchant descriptions have been replaced by three categories: 'Packaged', 'Bulk' and 'Processing'. These are clearly defined in the UFAS Standard, both in the Definitions appendix and the updated Activity Matrix, and are based on the activity of the business rather than the type of customer they predominantly trade with.

UFAS Scope changes – Trading, storing and transporting Combinable Crops

AIC have always tried to operate their assurance schemes in a pragmatic way to ensure that participants can have maximum flexibility in their business whilst minimising certification costs, audit time and the number of schemes they need. This approach does mean that there is sometimes more than one possible answer to the question: "Which scheme(s) should I be in?"

UFAS has always been a scheme focussing on animal feed whilst including combinable crops for all

uses. However, as the needs of purchasers of crops for use in the food industry have become increasingly complex, it has become more difficult to ensure that UFAS adequately covers this, whilst not losing focus on the core feed industry needs.

In 2018, it was decided that the scope of TASCSC Merchants should be extended to cover the trading of feed materials and compound feeds, in addition to combinable crops. Trading of medicated feeds and feed additives is not permitted under TASCSC.

As a result of these developments, the UFAS Review Group has taken a decision that businesses trading combinable crops for food use would be better served by being TASCSC certified. In light of this, the scope of UFAS has been restricted to trading combinable crops for feed and biofuel use. UFAS businesses that offer third party transport and storage services **may still store and transport combinable crops for food use**, as long as they have included these services in their certification scope.

New Audit regime

As announced in the last edition of UFAS Update, the 2020 Standard will be accompanied by changes to the auditing regime to improve the integrity of the scheme and help participants demonstrate ongoing compliance with the requirements. Overall, the changes made will mean a 35% increase in the number of audits carried out.

Short Notice Audits

The biggest change that participants will see is the introduction of an additional short notice audit for all sites (except invoice only merchants) once every three years. The cost of these additional audits will be spread across the annual renewal fees.

Participants will be informed by the Certification Body of the intention to carry out a short notice audit the working day before, and the aim of the audit will be to see the operations taking place on the day. As a result, there will be no need for the HACCP team leader or other specific personnel to be present. The audit will be scheduled to last half a day, and the auditor will carry out a brief opening meeting before focussing on reviewing current activities.

Any non-conformances identified will be raised in the usual way and

corrective actions submitted via the participant portal or email.

Unannounced Audits

In addition to the new short notice audits, the unannounced audit programme which UFAS has operated for several years will continue in an expanded form. Previously 5% of UFAS Compound Feeds sites would be subject to an unannounced audit focussed on hygiene. From March 2020, this will be expanded to also cover Merchant businesses, with approximately 10% of sites receiving an audit. Sites will be selected on a range of criteria, including intelligence/complaints received by the certification body, history of non-conformances as well as random factors to cover a range of business types.

Communication with the Certification Body

With the increase in short notice and unannounced audits, it will be increasingly important that participants communicate with the certification body about operational issues that may affect their ability to accommodate a short notice or unannounced audit. Some other schemes allow participants to nominate a fixed number of 'blackout days'. It has been agreed that UFAS will not limit this, but instead will

encourage participants to indicate times of plant shutdown or other issues to the certification body. Due to the focus of the audits, key staff being on leave will not be considered an appropriate reason for unavailability for an audit.

Cancellation & Refusal fees

In addition, the certification body may charge a cancellation fee if a participant is unable or unwilling to accommodate a short notice audit, and the audit will be required to take place within two months. Refusal of access for an unannounced audit may lead to suspension of certification.

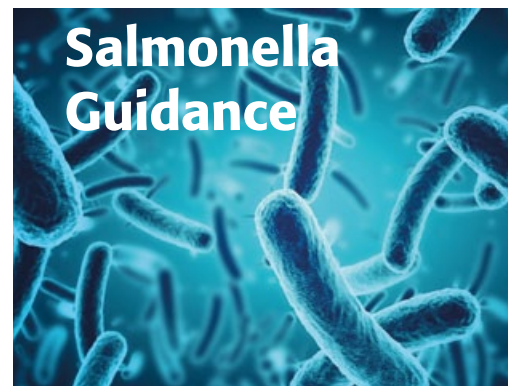
Updated Fees

Additional cost per site per year

| | |
|--------------------------------|------|
| Compounds | £220 |
| Processing Merchant | £160 |
| Bulk/ Packaged Merchant | £115 |
| Invoice Only Merchant | £10 |

Sampling & Testing Guidance

In addition to the new UFAS Standard, the Sampling and Testing guidance document published in 2016 will also be updated in the New Year to reflect changes to the UFAS Standard requirements and structure, as well as reviewing the information on analyses that participants may consider as part of their testing programme. As before, this document is purely for reference and will not be auditable.



Salmonella Guidance

Following enquiries from participants and discussions with other stakeholders, the UFAS Review Group have agreed to develop a new guidance document covering practical considerations of managing and testing for Salmonella in feed.

It is hoped that this document will be able to provide more detail on factors affecting the effectiveness of Salmonella management approaches and assist participants in maintaining appropriate hygiene standards. As with all guidance, the document will be for reference and not auditable, and it is hoped that the first version will be published in the first quarter of 2020.

Controlled products

UFAS 2020 contains a heavily revised section on Feeds containing Controlled Products (Veterinary Medicines and Specified Feed Additives). Key amongst the changes are:

- Requirements to access the Statement of Product Characteristics (SPC) for Veterinary Medicines and the authorising regulation for Specified Feed Additives (SFA)
- A requirement to inform the prescribing veterinary surgeon if a medicine is prescribed for inclusion in a feed containing an SFA
- A requirement to only incorporate reworks containing controlled products into feeds already containing controlled products

Participants with feeds containing controlled products in their scope are encouraged to read the new requirements as soon as possible, and identify any changes required within their business.

UFAS online tools

As indicated in the previous edition of UFAS Update, use of the online Vehicle Inventory will become compulsory for UFAS participants from the implementation of UFAS 2020.

The benefits of the participant portal go beyond managing a vehicle inventory and will also assist participants in preparing for audits and submitting any corrective actions afterwards.



UFAS Participant Portal

To sign up to the UFAS Participant Portal, which includes a facility for storing key documents and also contains copies of all previous letters from Lloyds Register, please contact ufas-ca@lr.org

Vehicle Inventory

The Vehicle Inventory portal makes it possible to maintain a single database of industry vehicles. The portal is hosted by Kiwa Agrifood. To gain access to this system please contact uk.feed@kiwa.com

Once a login has been set up, the Vehicle Inventory can be accessed via a link in the UFAS Participant Portal.



**For further information contact:
Simon Williams, Technical Manager**

AIC Services Ltd,
Confederation House, East of England Showground,
Peterborough PE2 6XE

T: 01733 385230 F: 01733 385270

E: simon.williams@agindustries.org.uk

