



8 April 2005

Dr Alison Tedstone
SACN
Room 808c
Aviation House
125 Kingsway
London
WC2B 6NH

Dear Dr Tedstone,

SACN Report on Vitamin A

I am writing on behalf of the feed members of AIC, the trade association providing a united voice for the agricultural supply industry. AIC represents UK member companies in animal feed, crop protection and agronomy, fertilisers, grain trading and seed. We are writing to you further to the release of the draft SACN report on vitamin A. Our main concern is the associated report that was also published on the FSA website in January entitled "Local Authority Sampling and Analysis Programme for Animal Feeds – Vitamin A".

It is the view of AIC that the conclusions reached from the report "Local Authority Sampling and Analysis Programme for Animal Feeds – Vitamin A" is likely to misrepresent grossly the position of the feed industry with respect to the levels of vitamin A included in animal feedingstuffs, and that any conclusions on the effects of Vitamin A in animal products derived from the levels found in the report are likely to be misleading.

The feed industry fully supports the FSA in ensuring that any risks to animals and indirectly to human customers from animal feeds are effectively minimised. However, it is extremely disappointed about the scientific quality of the "Local Authority Sampling and Analysis Programme for Animal Feeds – Vitamin A" for a number of reasons.

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The Statutory maximum levels for the different classes of feeds are defined in units of i.u. per kg of complete feeding stuff or of the daily ration. The fact that the levels found were up to ten times higher than the maximum levels permitted indicate that there was a very high probability that the descriptions applied to the samples taken at these higher levels were incorrect, although the report does concede that there may have been some “ possible erroneous classification of some complementary feeds as complete feeds”.

The report also fails to quantify the uncertainties associated with sampling and analytical errors. It concedes that for pig feeds sampled many would have conformed to legal limits had allowances for measurement of uncertainty been made. It begs the question why this was not carried out before the report was approved and published. It is well known that the recovery of Vitamin A in different types of feedingstuff can be affected by the levels of other ingredients present, and has always been a subject of debate amongst analysts.

The report gives the range of analysis of Vitamin A found together with the percentage exceeding MPL. However, there is neither data presented on the average levels found nor distribution tables showing the numbers analysed according to the scale of analysis, which would have given a much better assessment of the levels used in the feeds.

The average of 27% of samples exceeding MPL does not reflect the actual position of the industry with respect to vitamin A inclusion. The FSA would have access to the annual returns of LACORS with respect to the results of formal samples of feedingstuffs taken for statutory Vitamin A analysis. It is highly probable that the numbers of samples exceeding MPL would be very low indeed.

The fact that a result of 787,000,000 was permitted to be used in the report with the comment that it might possibly represent a reporting error, without this having been checked is alarming. It makes us speculate on whether the report was subject to proper refereeing before publication.

The feed industry is fully committed to the Universal Feed Assurance Scheme (UFAS). The UFAS Code of Practice requires certificated companies to assess analysis results against product specifications and where results fall outside the statutory limits or limits of variation specified within the quality control plan, an investigation must take place into the cause and remedial action must be taken. Conformance to these requirements is independently audited and manufacturers must comply with the Code of Practice in order to retain certification in accordance with EN 45011(ISO 65).Hence UFAS ensures that there is a process of sampling, analysis and assessment which would have exposed the existence of levels of Vitamin A in excess of the statutory declaration and taken steps to rectify the situation.

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In addition in a highly competitive feed market including up to ten times higher levels of vitamin A than allowed would not only risk prosecution, but would also not be commercially viable.

In conclusion, we consider that there can be little confidence drawn from the conclusions of the "Local Authority Sampling and Analysis Programme for Animal Feeds – Vitamin A". We would hope that our views could be taken into consideration if the report is used in connection with the SACN report on human food intakes of vitamin A. I would also like to add that the industry would only be too glad to assist FSA in carrying out a further robust study if that was helpful.

I am copying this letter to Dr Ray Smith, in Animal Feed Unit at the FSA.

With best wishes,

Yours sincerely,

A handwritten signature in black ink that reads "Judith Nelson". The signature is written in a cursive style with a horizontal line above the first few letters of the first name.

Judith Nelson
Head of Feed

cc:- Dr R Smith – Animal Feed Unit, FSA