Graeme Day,
Convener of the Environment, Climate Change and Land Reform Committee
Room T3.40
The Scottish Parliament
Edinburgh
EH99 1SP

Via email

Dear Mr Day

Re: Environment, Climate Change and Land Reform Committee Inquiry into the Environmental Impacts of Salmon Farming

Thank you for your letter sent to Mr Chris Hadkiss, Chief Executive of the Animal and Plant Health Agency (APHA), which was received on the 3rd March 2018, about the environmental impacts of salmon fishing. This has been passed to me to respond.

Firstly, please let me apologise for the delay in replying to you.

Requirements for collection, identification and transport of dead fish are set out in Article 21 of Regulation (EC)1069/2009 which sets out the requirements for collection and identification of animal by-products. Detailed implementing rules are contained in Annex VIII of Regulation (EC) 142/2011. Those transporting dead fish must comply with these rules.

Animal by-products must be collected, identified and disposed of without undue delay, in order to prevent risks arising to public and animal health. What constitutes „undue delay“ will depend on a case-by-case assessment depending on the type of animal by-products involved but for instance a farmer may have his fallen stock collected every few days and a retail shop may have a weekly return of out of date food.

Animal by-products must be transported in sealed new packaging or covered leak-proof containers or vehicles in accordance with Section I of Annex VIII. Containers must dedicated to the use of specific categories of animal by-products and where they are not

The Animal and Plant Health Agency is an Executive Agency of the Department for Environment, Food and Rural Affairs working to safeguard animal and plant health for the benefit of people, the environment and the economy.
they must be cleaned and disinfected after each use in order to prevent cross contamination.

Animal by-products must be identified in accordance with Chapter II of Annex VIII. They must be collected and identified by category. Mixtures of different categories of animal by-products must be treated as the higher or highest risk of the mixed materials e.g. if category 3 material is mixed with category 2 material, all the material must be disposed of as category 2 material. Category 3 material must be labelled as „not for human consumption“. Category 2 material must be labelled „not for animal consumption“ (unless it is specifically intended for feeding under the derogation in Article 18(1) of Regulation (EC) 1069/2009 for feeding to animals such as zoo and circus animals). Category 1 material must be labelled as „for disposal only“. Specific types of animal by-products such as collagen, blood products or raw petfood may require further labelling in accordance with Chapter II of Annex VIII of Regulation (EC) 142/2011.

During transportation a commercial document, or in certain circumstances, a health certificate must accompany the animal by-products, in accordance with Chapter III of Annex VIII. The commercial document must record the date on which the material is taken from the premises; a description of the material; the quantity of the material, in weight or volume; the place of origin of the material; the name and address of the transporter; the name and address of the receiver and its approval or registration number if appropriate; and the approval or registration number of the plant of origin if appropriate.

Annex VIII provides a model commercial document which may be used but it is not mandatory to do so provided all the required information is recorded. Records and related commercial documents or health certificates must be retained for at least two years.

Generally speaking if you are a plant handling animal by-products, you will need to be approved or registered. Registration must take place in accordance with Article 23 of Regulation (EC) 1069/2009. They must comply with the requirements of Article 20 and Annex IX Chapter IV of Regulation (EC) 142/2011. Registration generally applies to low-risk operations such as technical plants. You may also need to be registered if you transport animal by-products commercially.

APHA will offer specific advice to anyone who want to register to handle animal by products. They will also approve Animal By Product Facilities, and will carry out routine risk based inspections to regiatered and approved premises.
APHA works closely with Local Authorities, SEPA and Scottish Government and will ensure that our partners are kept up to date with new registered and approved premises, and will raise any issues or concerns with our partners. We will also let partners know when a premises has its registration or approval removed.

Food premises which are already registered or approved under food hygiene legislation. Regulation (EC) 852/2004 or Regulation (EC) 853/2004 do not need to be further registered by APHA.

Yours sincerely.

Amanda Cartwright
Head of Executive Support and Correspondence Management