



British Equestrian Trade Association/ UFAS Compound Feeds Control of Naturally Occurring Prohibited Substances (NOPS)

To be read in conjunction with UFAS Compound Feeds
Code of Practice August 2009

Introduction

The International FEI rules for competition and the British Horseracing Authority's Rules of Racing regarding naturally occurring prohibited substances in feed state a no threshold policy for substances that could affect performance with the exception of theobromine, thus implying that all feed fed must be free from such substances.

Such naturally occurring prohibited substances (NOPS), however, pose a real problem to the sport regulatory bodies (who obviously wish to prevent the illegal use of substances that could affect performance), feed manufacturers (who need to be able to commercially provide their clients with products that are suitable for purpose) and horse owners and trainers alike.

It is thus incumbent on all persons in the equine feed chain to adopt a policy of feed supply that will take every precaution to minimize the risk of feeding a horse with such a prohibited substance.

BETA, through the work of the Feed Committee, has considered the issues surrounding the control of such occurrences (Wynne 2006) and whilst recognizing that it is impossible to be absolutely certain that a feed material is completely free from such substances, it has established that good purchasing and manufacturing practice together with adoption of suitable risk analysis and management by horse owners can go a long way towards precluding such contaminants and substantially reducing the risk of their presence in the horse.

Whilst recognizing that analytical screening for prohibited substances should form an integral part of the process it should not be the sole methodology for monitoring the absence of such substances in feed. Furthermore the occurrence of naturally occurring prohibited substances within feeds and feed materials tends not to be homogeneous but rather in random and discrete pockets such as occurs with the presence of mycotoxins and salmonella. By their sporadic presence therefore such substances are less likely to be detected through routine sampling methods. Prevention by good practice at source / during feed preparation is needed. This applies to both feed manufacturing and the preparation and feeding of the horse in the yard.

However diligent feed manufacturers are, due to the fact that such substances may be naturally occurring in feed materials, there will always be a risk of their presence in ingredients destined for horse feed manufacture.

This Appendix is for use by those UFAS manufacturers of equine feeds and supplements who wish to demonstrate and confirm that they conform to current best practice in minimising the risk of contamination by NOPS in the equine feeds which they produce, in conformance with the requirements of the BETA/BHA NOPS Feed Assurance Scheme. In order to claim compliance with the BETA / BHA NOPS Feed Assurance Scheme, companies must agree to the full conditions of the Scheme, available from BETA or SAI Global. In the case of non-BETA members a license fee will be incurred.

DEFINITIONS

A. Naturally Occurring Prohibited Substances. (NOPS).

For the purpose of this Appendix, the following substances are defined as Naturally Occurring Prohibited Substances (NOPS):-

Caffeine +
Theobromine +
Hordenine
Hyoscine +
Morphine +
Lupanine
Bufotenine

The NOPS listed may be divided into high priority (+), the rest being considered low priority. This priority has been agreed with the British Horseracing Authority.

B. AT RISK MATERIALS

Divided into

- i. **Excluded at risk materials** must be excluded from feed due to the material being at high risk of containing a high priority NOPS contaminant
- ii. **Sensitive at risk materials** that may be used but with caution. This category is in turn divided into two groups.

Sensitive A : Material being at high risk of containing a low priority NOPS contaminant.

Sensitive B: Material being at low risk of containing a high priority NOPS contaminant.

These lists are not exclusive.

Excluded list:

Bakery and biscuit products and by-products, including biscuit meal.
Confectionery waste
Traded grain screenings
Datura seed
Coffee products and by-products including cherco
Chocolate products and by-products
Poppy seed, poppy heads, poppy straw (which may be pelleted)

Sensitive A List:

Sprouted grain
Lupins.
Canary reed grass.

Sensitive B List:

Cereals
Cereal by-products
Forage products

Note: The additional requirements in this Appendix use the same numbers as related clauses in the main code, and represent additional audit points against which participating factories will be assessed.

Clause	Requirement	Guidance
A	Introduction	
A2	Control of Hazards	
A 2	The risk assessment, based on HACCP principles, must consider the presence of NOPS as a hazard.	
A4	Control of Hazards	
A 4	All equine feeds produced by a factory audited to this appendix must comply with its requirements.	
A8	Maintenance of Supply	
A 8	Alternative supplies of equine feeds must be sourced from a manufacturer complying with this Appendix.	There should be a plan for supply of feed to be sourced in the event of plant breakdown or emergency.
C	Manufacturers own storage (Feed Ingredients and Compound Feeds)	
C2	Safety & Security	
C 2.4	All returned or rejected feed or feed ingredients identified as a potential NOPS risk following unsatisfactory ELISA or other NOPS screening tests or for any other reason must be identified and must be quarantined until release/ disposal is approved by the Quality Controller.	Returned bags that are damaged or been opened should be considered a high risk in terms of NOPS and quarantined and disposed of appropriately.
C7	Finished Product Storage – Off site Storage not owned by the company	
C 7.1	Assessments of offsite stores used by the factory must ascertain whether Excluded or Sensitive A List At Risk materials have been handled or stored within the past two years, and ensure appropriate control measures are implemented	Stores should be informed of the list of At Risk materials. Site visits by audit staff should be carried out as indicated by a risk assessment of the store. Audit staff should have relevant NOPS knowledge. If Excluded or Sensitive A List At Risk materials have been stored in the previous two years, there must be evidence that cleaning has taken place subsequently.
D	Feed Ingredients	
D1	Selection and Approval	
D 1.1	The use of At Risk materials included in the excluded list as shown in the Definitions is prohibited in equine feeds.	

D 1.2	All feed ingredients used in the factory must be assessed to ascertain the risk of NOPS being present.	Possible contamination from feed ingredients or other materials at risk of containing NOPS must be considered and appropriately controlled. Examples: <ul style="list-style-type: none"> • Are morphine poppies likely to be grown in rotation on farms growing or storing ingredients? • Are plants or plant products known as common sources of NOPS likely to contaminate this ingredient? • Is the ingredient processed or stored in the same plant known to process any NOPS or materials likely to contain NOPS?
D 1.3	The person responsible for selection and approval of feed ingredients must have training regarding NOPS and their likely sources.	The training record should show that the person has knowledge of sources of NOPS, the At Risk materials and possible routes of contamination.
D2 Supply of feed ingredients to UFAS Feed Manufacturers		
D 2.1	Unless suppliers of ingredients used in equine feeds are also UFAS participants certified to the NOPS appendix, the feed manufacturer must carry out an additional supplier assurance programme.	Current assurance schemes do not cover the NOPS issues but do confirm traceability. A supplier assurance programme is a supplier audit at a defined frequency based on risk assessment. This may be done by completion of a questionnaire, the results of which are then assessed by the feed manufacturer.
D 2.5	When communicating assurance requirements to feed ingredient suppliers reference must be made to the additional requirements of this Appendix.	For NOPS distribution, a robust, supplier assurance program is required to help reduce the risk of contamination/NOPS being present within a feed/feedstuff This could be achieved by inserting additional wording into the letter to suppliers e.g. “...Please also confirm that if At Risk materials listed in UFAS NOPS Definitions are handled by your company or its suppliers, this is undertaken in such a way that they cannot contaminate the feed ingredients which you supply to us.”

D3	Feed ingredients which may be supplied to UFAS NOPS Feed Manufacturers	
D3.2	Complementary Feedingstuffs (Including “concentrates”) must be produced by a manufacturer complying with this Appendix	This applies to purchased concentrates (often pellets) used as feed ingredients, but not to premixtures of feed additives incorporated in complementary feeds.
D3.9	All equine compound feedingstuffs sold or distributed by companies which conform to this BETA/UFAS NOPS Appendix must be sourced from a currently certificated UFAS feed manufacturer complying with this Appendix.	This applies to all equine compound feeds including those which are contract manufactured.
D4	Specifications	
D 4	The ingredient specification must also include reference to the list of NOPS as defined in this Appendix.	See Definitions.
D5	Transport	
D 5.5	Vehicles that have previously (in the last 3 loads) carried Excluded At Risk Materials as listed in the excluded list in this appendix must be rejected. Vehicles that have carried NOPS sensitive A list materials must show evidence of appropriate cleaning.	This additional requirement should be communicated to all suppliers as part of purchaser terms and conditions or contract.
D6	Feed Material Stores (Third Party)	
D 6	A risk assessment must be carried out with respect to NOPS for all third party stores used. Any stores where a significant risk is identified must be inspected.	Initial assessment may be carried out by a questionnaire, the results of which are then assessed by the feed manufacturer.
D9	Mill Acceptance Procedure	
D 9	Mill acceptance procedures must include reference to NOPS.	Training of intake operatives should include visual recognition of At Risk Materials and of weed seeds
D11	Customer requests for incorporation of own supplied ingredients or products	
D 11	Incorporation of customers own ingredients is not permitted in equine feeds, and must not enter the equine feed production line, unless they are a UFAS NOPS supplier.	Where there are multiple production lines, the requirements for the production line used for equine feeds extend from intake via storage to packaging or outloading.
E	Manufacturing	
E1	Written Manufacturing Procedures	
E 1.3	At Risk materials as listed in excluded list in the Definitions are prohibited from equine feed production lines.	Where there are multiple production lines, the requirements for the production line used for equine feeds extend from intake via storage to packaging or outloading.
E3	Production	

E3.1	Manufacture of medicated premixtures and premixtures containing specified feed additives	
E 3.1	Factories conforming to this Appendix must not produce or handle medicated feeds on the same production line as equine feeds.	Where there are multiple production lines, the requirements for the production line used for equine feeds extend from intake via storage to packaging or outloading.
E 5	Rework Material	
E 5.2	Rework Rules	
E 5.2.1	Rules for reworks must consider the risk of NOPS and /or medicinal product contamination.	Broken bags originating in-plant must be segregated and assessed for contamination risk before reworking is permitted.
E 5.2.4	Reworks originating from feeds for species other than equines must not be used in equine feeds, unless it is manufactured on a NOPS line within the same mill.	
E 12	Contract Sample Processing of Cereals	
E 12	Mobile contractors must not be used for equine feeds.	
G	Loading, Transport and Delivery	
G 1	AIC TASCC Code of Practice for Road Haulage	
G 1	Hauliers used to deliver equine feeds must be made aware of the requirements of this Appendix	Hauliers should be informed of the list of At Risk materials
G 4	Previous Loads	
G 4	Bulk delivery vehicles that have previously (in the last 3 loads) carried Excluded or Sensitive A List At Risk materials must be rejected.	
H	Quality System	
H 1	Scope and Purpose	
H 1.1	The quality system must incorporate the measures necessary to implement the requirements of this Appendix	
H 2	Quality Control	
H 2.1	The quality controller must be familiar with NOPS.	The training record should show that the person has knowledge of sources of NOPS, the At Risk materials and their implications for equines.
H2.6	Responsibilities	

	In the case of a NOPS positive being notified to a company by a regulatory body, the company must inform BETA immediately, who will in turn inform SAI Global and AIC/UFAS. In the case of a positive being identified through in-house testing BETA should be informed.	BETA will be operating an early warning system to alert other companies signed up to the NOPS appendix of any possible contamination issues.
H 4	Analytical Schedule	
H 4.1	The hazards associated with NOPS must be considered in arriving at the analytical schedule	
H 4.2	The analytical schedule must include sampling and analytical procedures based upon a NOPS risk assessment, along with methodology and details as to frequency of internal and external analysis carried out on both incoming feed ingredients and finished feed.	The degree of sampling and analysis of feed ingredients and finished feed should be derived from the companies own individual risk assessment for NOPS
H 5	Testing Facilities	
H 5.1	When selecting a laboratory, their competence with regards to testing for NOPS must be considered.	An accredited laboratory or a validated analytical method for the substance being tested should be used.
H 7	Samples	
H 7.1	Sampling methods must be appropriate for NOPS and arrived at by applying the HACCP technique.	<p>Where NOPS distribution within a feed/ feedstuff is general /homogeneous in nature, an appropriate robust, practical, cost effective, sampling program can be devised which will help identify its presence .</p> <p>Where NOPS distribution within a feed/feedstuff is pocket or non-homogeneous in nature there is no practical, robust, sampling program that can be devised to effectively identify its presence.</p> <p>For both types of NOPS distribution, a robust, supplier assurance program is required to help reduce the risk of contamination/NOPS being present within a feed/feedstuff.</p> <p>The schedule of assurance activity may therefore differ depending on the individual NOPS, the feedstuff concerned.</p>

H 10	Results of Inspections and Analyses	
H10.3	Failures against NOPS criteria must be investigated and appropriate action taken.	Dispose of feed to an alternative species or a risk assessed non-sensitive equine customer.
K 5	Training	
K 5	Staff training must include an understanding of NOPS ingredients as listed in this appendix and of their significance and potential risk to the finished feed.	Training records should confirm training relevant to the responsibilities of the individual.