

Feed and Feed Ingredient Manufacturing Committee Report/Minutes

Tuesday, August 13th, 2013

1:30-3:30

2013 AAFCO Annual Meeting

St Pete Beach, Florida

COMMITTEE RECOMMENDATIONS: Approved by committee to be sent to the board for approval and sent to the membership for voting at 2014 Mid-Year Meeting.

BOARD RECOMMENDATIONS: None

ASSOCIATION ACTIONS: None

Committee Participants:

Members present: Glo Dunnavan, Ken Bowers, Bob Geiger, Jo Gully, Jamey Johnson, Ben Jones, Ali Kashani, Darlene Krieger, Doug Lueders, Judy Thompson

Advisors present: David Ailor, Veronica Daenzer, David Fairfield, Matt Frederking, David Meeker, Richard Sellers

Committee Report/Minutes:

1. Meeting called to order by Judy Thompson at 1:30 pm EDT. Members, advisors and guests introduced themselves.
2. The minutes from the 2013 Mid-Year Feed and Feed Ingredient Manufacturing Committee Meeting held on January 22, 2013 were voted on and approved on March 28, 2013. These were posted to the website. No further action is needed.
3. Industry Stakeholder Updates
 - a. Industry Work on Developing FSMA Guides (Richard Sellers/David Fairfield)
While the Human Food Safety Alliance has been very actively working on the development of a curriculum for industry, the progress related to animal feed has been limited because the regulatory proposal has not yet been made public. Given that the food and feed proposals are likely to be very similar, it should be reasonably simple to modify the materials developed for food once the feed rule is available for comment.
 - b. AFIA (Richard Sellers)
 - i. SF/SF update - New owner to be announced shortly
 - ii. Kansas State University Online Feed Technology Courses - Register through KSU using the following link <http://www.dce.k-state.edu/distance/>
 - iii. HACCP Course available through www.afia.org More information at the following link: <http://www.afia.org/Afia/EducationMaterials/EventsMeetings.aspx>
 - iv. Feed Safety Seminars/Workshops hosted by AFIA - More information available at www.afia.org

v. IFIF

1. Convergence Project Update (Kristi Smedley)

7 Jurisdictions (Canada, US, Europe, South Africa, Brazil, China and Japan) are participating in an initiative to evaluate the policies and procedures in relation to ingredient approval. The report identifies that all of these jurisdictions require manufacturing information, chemistry, stability, human food safety, target animal safety and some require additional information related to environmental safety and worker safety. The document is available at www.ifif.org using the following link:

<http://ifif.org/pages/t/IFIF+Comparison+Project>

Europe, Canada, and US are going to use a single submission package to assess acceptability with their respective processes to further identify differences in requirements in these jurisdictions.

2. FAO Life Cycle (Richard Sellers)

FAO is conducting life cycle assessments of plant and animal by-products using the Livestock Environmental Animal Feed System model (LEAFS). LEAFS ranks the environmental impact (global footprint) of general feed ingredients. There is a great deal of interest from Europe where FEFAC has entered into a public/private partnership with FAO. The initial listing/comparison of ingredients should be available from the FAO by end of 2014. The goal is to ensure that the rankings are science-based without undue consideration of esoteric issues.

3. Specialty Feed Ingredient Global Assessment of these Life Cycle Assessments (amino acids, etc.) – (Richard Sellers)

As the LEAFS project does not include assessment of specialty feeds such as amino acids, yeasts and other products of fermentations, FEFANA is supporting a similar undertaking in relation to ingredients manufactured by their membership.

vi. National Salmonella in Feed Sampling Plan (Richard Sellers)

Planning to collect 500 samples of feeds and feed ingredients (other than pet food) for Salmonella analysis and where positive samples are identified submit the samples for serotyping. Samples will be tested at the Agricultural Research Center in a blind study with AFIA providing funding. If you would like to supply samples, there will be a notice in trade magazines on the necessary steps. Hoping to have the results published in a recognized scientific journal with an eye to the possible elimination of Salmonella as a hazard reasonably likely to occur.

Salmonella Control Guidelines are available on www.AFIA.org using the following link:

<http://www.afia.org/AFIA/Files/GUIDANCE%20DOCUMENTS/SALMONELLA%20CONTROL%20GUIDELINES%202010%20FINAL.pdf>

4. **US Federal Regulatory Update (Eric Nelson)**

Topics discussed

- i. Salmonella Compliance Guide (including sampling directives) is in the Clearance process and there is no time frame identified for its release
- ii. Ingredient “Standards” – work on this has been stalled moved forward
- iii. FSMA Training
Will be using the same process as used when Seafood and Juice HACCP rules were released, e.g., food safety alliance. A draft of the human food curriculum is scheduled for release in September 2013. Progress on animal food has been delayed because the draft regulations have not been released. Training for state, federal and industry to be developed. Mike Davidson has replaced Dr. Waltz as the AAFCO representative on the Alliance.
- iv. FSMA Comments
Preamble includes specific questions to be answered. Industry groups are currently focused on developing comments on the human food rules. Focus will broaden when the animal feed rules are released.
- v. FSMA Guidance Development
 - FDA has contracts out to write Hazard Identification and Preventive Control Guidance Documents
 - FSMA Operations Team to help re-educate field operations in new preventative approach
 - Comment period for all regulatory proposals ends November 13, 2013
 - Reviewing food preventive controls, 21CFR110 will provide good insight on animal feed preventive control proposals
- vi. Feed Mill Reporting of Antibiotic Use
Some activity around the use of drug listing and marketing reports to determine drug usage in livestock feed in support of the AMR initiative. Lack of support has delayed/stalled implementation. Three Bills - one in Congress and two in Senate which have different approaches.

ACTION: AAFCO is looking to have a working group develop comments on the feed preventive controls. Goal is to start with food preventive controls (excepting allergens) and then tweak as necessary. Interested parties should contact FFIMC Chair at judy.thompson@inspection.gc.ca as soon as possible. So far, working members include Judy Thompson and Ken Bowers with support from Advisors. Glo Dunnavan would like to assist in the review of the Third Party/Foreign Supplier Verification rules.

ACTION: Ali to request NASDA’s comments to human preventive controls rule.

5. Canadian Regulatory Update (Judy Thompson) – See attached PDF of PowerPoint presentation for details (Attachment I).

6. Feed Contaminants Working Group Updates
 - a. Mineral Guidelines (lead, TBC)
 - i. Sharon Benz volunteered to identify a CVM rep to lead. Other working group members include Jon Nelson, Tim Costigan, Jennifer Kormos, David Syverson

ACTION: Sharon Benz to identify lead for Mineral Guidelines Working Group.

ACTION: Working group to review and revise Mineral Guidelines in the OP for discussion at Mid-Year

- b. Table Top Exercises for Emergency Taskforce Workplan (lead, Gloria Dunnavan)
 1. Survey membership about existing emergency incident plans
 - Draft proposed member survey - Completed and forwarded to Feed Manufacturing Committee Chair
 - Solicit comments from Feed Manufacturing Committee and revise
 - Issue survey to membership on or about 10-1-2013 with proposed due date of 11-15-2013
 - Evaluate response to survey by 12-15-2013
 2. Review current AAFCO Emergency Plan guidelines in light of survey results during 2014 Mid Year meeting
 - If warranted, revise/enhance AAFCO guidelines [completion date estimated at 5-30-2014 but may change depending on amount of revision]
 - Draft new guidelines forwarded to Feed Manufacturing Committee for review and comment - comments back by 2014 annual meeting
 3. Draft Tabletop Exercise Guidelines - estimated completion by 2015 Mid-year meeting

ACTION: Judy to share proposed member survey and workplan for the Strategic Plan with working group and FFIMC members and advisors and request comments (Attachments II and III).

ACTION: Glo to issue survey to membership when final.

ACTION: Judy to work with Glo to develop materials regarding Emergency Plan for Strategic Affairs Committee.

7. Other Business
 - a. Codex Update

On 2 July 2013 delegates at the 36th Session of the Codex Alimentarius Commission meeting in Rome adopted the Codex Ad Hoc Intergovernmental Task Force on Animal Feeding (TF AF) terms of reference documents:

 - "Guidelines on Application of Risk Assessment for Feed" which include specific science-based risk assessment criteria to apply to feed contaminants and to enable countries to prioritize and assess risks based upon local conditions, use and the impact on human health.
 - "Guidance for Use by Governments in Prioritizing the National Feed Hazards' in Feed Ingredients and Feed Additives for Governmental Use" by using clear criteria to prioritise the list of hazards and take account of the potential transfer of contaminants in feed to edible animal products

Action Item Table

Responsible	Item	Action	Timing / Status
Judy Thompson	Establish working group and develop FSMA comments for Board of Directors	Recruit working group members and develop process for collecting comments.	August 31, 2013
		Draft comments for approval by BoD	October 21, 2013
Ali Kashani	Request NASDA comments	Request comments on food preventative controls from NASDA and provide copy to working group	August 31, 2013
Sharon Benz	Lead for Mineral Guidelines Working Group	Sharon Benz to identify lead from CVM for Mineral Guidelines Working Group	September 15, 2013
Mineral Guidelines Working Group	Review and Revise Mineral Guidelines	Working group to review and revise Mineral Guidelines in the OP for discussion at Mid-Year	November 15, 2013
Judy Thompson/ Glo Dunnavan	Strategic Plan – Emergency Response	Circulate proposed member survey and workplan for tabletop exercise to working group and FFIMC members and advisors and request comments to Glo by September 15, 2013 (Judy)	August 31, 2013
		Survey AAFCO members regarding their emergency response plans (Glo)	October 2013
		Evaluate survey responses and review current AAFCO Emergency Plan guidelines (Glo and working group)	January 2014

Attachment I – Update on renewal of Canadian feed regulations



Update on renewal
of Canadian feed reg

Attachment II – AAFCO Emergency Response Plan Survey – Draft for Comments



AAFCO Emergency
Response Plan Surve

Attachment III – Workplan for AAFCO Tabletop Exercise– Draft for Comments



Workplan for AAFCO
Tabletop Exercise Au