

Feed and Feed Ingredient Manufacturing Committee Report/Minutes

Monday, January 18, 2016

1:30-3:00

2016 Mid-Year Meeting

Isle of Palms, South Carolina

Committee Recommendations to Board and Membership:

1. The Feed and Feed Ingredient Manufacturing Committee recommends the following modifications to the 2016 Official Publication:
 - a. Remove the AAFCO Model Feed Safety Program Plan – August 2007 (pages 260-261 in the 2016 OP) and the Model Feed Safety Program Development Guide (pages 262-273 in the 2016 OP) as this information is redundant to the recently published Animal Feed Regulatory Program Standards. The information should be archived separately in the Feed Bin.
 - b. Replace the AAFCO Model Emergency Response Preparedness Guidance Document (pages 310-313 in the 2016 OP) with the text contained in Attachment B and assign the role of Section Editor to Darlene Krieger.

Committee Participants:

Members present: Ken Bowers, Bill Burkholder, Bob Church, Stan Cook, Mike Davidson, Tim Darden, Bob Geiger, Jamey Johnson, Ben Jones, Ali Kashani, Darlene Krieger, Doug Leuders, Dragan Momcilovic, Shaness Thomas, Judy Thompson

Advisors present: David Ailor, Tomas Belloso, Lorri Chavez, David Dzanis, David Fairfield, Matt Frederking, David Meeker, Jessica Meisinger, Richard Sellers

Committee Report/Minutes:

1. Meeting called to order by Judy Thompson at 1:30 pm MT. Members and advisors in the room and introduced themselves.
2. The minutes from the 2016 Mid-Year Feed and Feed Ingredient Manufacturing Committee Meeting held on January 18, 2016 were voted on and approved on February 11 and 12, 2016 (February 8, 2016 Motion – Tim Darden, NM/Second – Ken Bowers, KS). These were posted to the website. No further action needed.
3. **Review of Action Items (See Attachment A for summary of updates)**
 - **Mineral Guidelines Working Group – Bill Burkholder**
Working Group has not yet finalized their revision of the Mineral Guidelines Chapter in the OP but is hoping to submit their recommendation by May 1, 2016.

- **Emergency Response Working Group – Darlene Krieger**

The working group requested that earlier proposed revisions to the AAFCO Model Emergency Response Preparedness Guidance Document (pages 310-313 in the 2016 OP) identified in Attachment B with Darlene Krieger as the new Section Editor be made. The working group is developing a table top exercise to be held in conjunction with the 2017 Mid-Year Meeting.

- **AAFCO FSMA Implementation**

- Working Groups formed to address the items assigned by the FSMA Implementation Task Force. Charge to the working group and deadlines are identified in the Action Item Table in Attachment A.

1. Strategy for AAFCO GMPs – Ken Bowers

- A survey of twelve states was conducted (eight states responded) with the following questions:
 1. Do you issue GMP certificates?
 2. Did you adopt the AAFCO GMPs and if so are you going to replace them with the new Federal (non-medicated) ones?
 3. Would guidance help states with the transition to FSMA GMPs or are states diverse enough that they will decide individually how and what to adopt regarding the Federal GMPs?
- The survey identified two States that had adopted the AAFCO GMPs. Richard Sellers, AFIA indicated that AFIA had surveyed all the States earlier and that they would share that information with this working group.

2. Model Feed Safety Program Plan in OP – Judy Thompson

- The working group proposes the removal of the AAFCO Model Feed Safety Program Plan – August 2007 (pages 260-261 in the 2016 OP) and the Model Feed Safety Program Development Guide (pages 262-273 in the 2016 OP) as this information is redundant to the recently published Animal Feed Regulatory Program Standards. The information will be archived in the Feed Bin for future information.

3. Contaminant and Hazard Lab Strategy – Mike Davidson

- In preparation for FSMA implementation the California Department of Food and Agriculture has developed a number of tools for inspection staff (e.g., Hazard List, 3 Checklists for Internal Audits – FSMA GMPS, Hazard Analysis and Preventive Control) and regulated parties that are available on their web-site at <https://www.cdfa.ca.gov/is/ffldrs/safe.html>

4. Inspector Training for Ingredient Manufacturing Inspections – Judy Thompson

- Awaiting completion of FSPCA curriculum and training materials

4. US Federal Regulatory Update – Eric Nelson

FSMA

FDA is in the process of developing guidance for regulated industries, State and Federal regulators and International stakeholders.

Program Alignment

This initiative was directed by the previous Commissioner and aligns the functions and work in the FDA within seven (7) commodity groups, including: food and animal food; and pharmaceuticals (includes veterinary drugs). The goal is to apply science and policy to field results and ensure that ORA activities are aligned with the Centre's priorities. The Agency is moving to a uniform inspection approach using a common case material template and is also working toward common and uniform application of import controls.

Risk-informed work planning will be used to collect information to support the use of qualitative public health metrics rather than quantitative delivery targets. The intent is to measure the impact of FDA's programs and presence on industry responsiveness. Educate while and before we regulate will continue to be the approach.

5. Preventive Control Alliance (David Fairfield, Sonya Lambkin, FDA)

Discussion this morning provided a good update of the work so only a limited update was required.

The importance of looking for the Alliance logo in conjunction with training for Qualified Individuals was stressed for both Lead Instructor and Participant courses. This will ensure that the training being offered is the standardized curriculum recognized by the FDA. The hope is that there will be a large network of qualified individuals available to provide the training. There are opportunities to customize the materials for a specific industry sector; however, the trainer will require permission of the Alliance to do so.

Reminder that there are options to be considered a Qualified Individual; a combination of experience and other training is an alternative to the completion of FSPCA curriculum. For those that chose the curriculum, a 2.5 day course is anticipated. In the future, there is a possibility of a blended learning approach (e.g. 1-day on-line to address basic information and 1.5-day face-to-face to allow for questions, discussions and exercises). There is international interest in the curriculum (especially for food) so the FDA is looking at providing foreign language translations possibly as early as 2017.

Applications for Lead Instructors to deliver courses for participants to receive FSPCA certification have been received from a wide range of individuals. So far, only 18 that are animal food specific have been received but there are a large number that have identified both food and feed. David Fairfield, NGFA is involved in the review panel. There has been a delay in responding to the animal food applications as the qualifications for animal food (experience/qualifications, instructional experience) were not requested in the applications. Applicants will receive follow-up communications so that the needed information can be provided. There is still an opportunity to submit an application to be a Lead Instructor on the FSPCA web-site for FDA, States and Industry.

http://www.iit.edu/ifsh/alliance/resources/li_application_form

6. Canadian Regulatory Update - Judy Thompson

Judy provided the Membership with a regulatory update of the current and planned changes for the Canadian Food Inspection Agency (CFIA). (See Attachment C)

Please note that information on the "Consultations on Proposed Regulatory and Policy Changes" webpage has been updated:

<http://inspection.gc.ca/animals/feeds/consultations/eng/1343855817011/1343856000143>

Four (4) documents have been added:

1. Feed Regulatory Renewal Consolidated Modernized Framework Proposal

The Closing Date for comments is March 18, 2016.

2. Collective Terms on Feed Ingredient Labels Consultation Summary - Respondent Comments and CFIA Responses

3. Feed Ingredient Assessment and Authorization Consultation Summary - Respondent Comments and CFIA Responses

4. Feed Labelling Consultation Summary - Respondent Comments and CFIA Responses

7. ISO/TC 34/SC 17 – Management Systems For Food Safety – Working Group 9 - Feed Production (David Fairfield).

This work was initiated to develop technical specifications for prerequisite programs for animal feeds to support management systems for those companies using ISO 22000. PAS 222/2011 was used as a starting point. PAS 222/2011 can be downloaded at

<http://shop.bsigroup.com/en/forms/PASs/PAS-222/>

Animal food requirements will be applicable to animal feed for food producing animals as well as pet food.

The Working Group includes representatives from 25 countries. American National Standards Institute (ANSI) is the organization representing the USA. The U.S. Technical Advisory Group includes Henry Turlington (AFIA), Pat Tovey (PFI) Dave Harlan (Cargill), Dave Fairfield (NGFA).

Three meetings were held the last being in Paris, France in October, 2015. At this meeting the working group reviewed comments received related to the draft circulated after the February 2015 meeting. The final document should be published in June 2016 as a technical specification subject to a 3-year review period and available for purchase. At that point, the document will either become a standard or remain a technical specification for a maximum of three more years at which time it would either become a standard or removed from the ISO web-site.

8. Industry Updates

a. American Feed Industry Association (AFIA)

- i. Richard Sellers reminded meeting participants of the upcoming 5th Global Food and Feed Conference in Ankara, Turkey (April 2016). The annual feed regulators round table will be held in conjunction with the Conference. **Confirmed with Richard after out meeting that the Conference is going to go ahead as planned.**
- ii. Richard Sellers reminded meeting participants of the upcoming International Production and Processing Expo in Atlanta, Georgia. Sam Davis, Richard TenEyck, Ali Kashani and Kent Kitade will be attending on behalf of AAFCO.
- iii. AFIA has contracted with the University of Minnesota to develop a HACCP model to address known hazards and those reasonably expected to occur. The report is expected to be available late-October 2016. Individual feed mills would use the model as a starting point that would be customized based on their specific ingredients and processes using scientific data.

b. National Renderers Association (NRA) and National Oilseed Processors Association (NOPA)

- i. David Meeker, NRA and David Ailor, NOPA, both members of the working group developing the standardized curriculum with FDA, Industry and Academia, expressed appreciation for the collaborative process being used to develop the curriculum and the model food safety plans.

c. Meeting attendees were also advised of a proposed 1/2 day seminar on the process for hazard identification planned for the upcoming joint meeting of The American Society of Animal Science (ASAS), the American Dairy Science Association (ADSA), the Western Section of the American Society of Animal Science (WSASAS), and the Canadian Society of Animal Science (CSAS) will hold the 2016 Joint Annual Meeting (JAM) in Salt Lake City, Utah, July 19-23 <https://asas.org/meetings/jam-2016/home>

9. Other Business

- a. The Committee Chair, Judy Thompson announced her intention to step down because she was taking on a new role in the Canadian Food Inspection Agency that precluded her ongoing participation in AAFCO. Going forward, the Committee Leadership will be comprised of: Committee Chair – Alan Harrison, Feed and Milk Coordinator, Division of Regulatory Services, University of Kentucky and Vice Chair – Eric Brady, Pesticide Inspector III, Field Supervisor, Tennessee Department of Agriculture

10. Meeting adjourned at 2:45 EST.

Attachment A - Action Item Table

Responsible	Item	Action	Timing / Status
Mineral Guidelines Working Group	Review and Revise Mineral Guidelines	<p>Working group to develop plan to review and revise Mineral Guidelines in the OP for discussion by the Committee</p> <p>Workgroup Members: Bill Burkholder (lead) Jon Nelson, Tim Costigan, Jennifer Kormos David Syverson, Bill Hall, Dave Dzanis, Roger Hoestenbach</p> <p>Update Working group is progressing well and it is expected that a report will be provided to the committee by May 1, 2016.</p>	Update at August 2016 Annual Meeting
Darlene Krieger	Strategic Plan – Emergency Response	<p>Working Group to:</p> <ul style="list-style-type: none"> • review and revise the information on emergency response in the current OP (completed) • develop a folder in the Feed Bin for States to place any table top exercise materials they may have for others states to use (completed) • develop a table top exercise that could be used at an upcoming AAFCO meeting <ul style="list-style-type: none"> ○ Tabletop exercise at April 2015 Feed Administrator’s Seminar (completed) ○ Larger tabletop exercise to be held in conjunction with the 2017 Mid-Year Meeting <p>Workgroup Members: Darlene Krieger (lead), Glo Dunnavan, David Fairfield, Dragan Momcilovic, Tim Darden, Stan Cook, Tim Lyons</p>	Update at August 2016 Annual Meeting

Responsible	Item	Action	Timing / Status
Judy Thompson	FSMA Implementation Task Force	<p>Items identified at April 27, 2015 meeting</p> <ol style="list-style-type: none"> 1. By August 2016, determine the path forward for: <ol style="list-style-type: none"> a. AAFCO GMPS (in consultation with MBRC and PFC) <ol style="list-style-type: none"> i. Develop a plan for states that have adopted AAFCO's model GMPs to make the transition to FSMA GMPs <p>Working Group#1 – Ken Bowers (lead), Bob Church, Bob Geiger, Matt Frederiking, Richard Sellers</p> <ol style="list-style-type: none"> b. Model Feed Safety Program Plan (in consultation with Linda Morrison (OP Section) and Bob Waltz (Feed Safety Coordinator) (recommendation to the Board and Members made – completed) <p>Working Group# 2 – Judy Thompson (lead), Linda Morrison, Bob Waltz</p> <ol style="list-style-type: none"> 2. After FSPCA/FDA conclude their work in this area, determine the contaminants, hazards, matrix and action levels and enforcement strategies to provide guidance to LMSC to inform method development priority setting. Integrate collaboratively into current LMSC priorities. (in consultation with FSPCA, EIC, ISC, IDC and LMSC) <p>Working Group# 3 – Mike Davidson (lead), Srinu Chigulubadi (FDA) ++</p> <ol style="list-style-type: none"> 3. After FSPCA/FDA conclude their work in this area, determine whether training material for feed ingredient manufacturing from the FSPCA will meet the needs of Inspectors for training (in consultation with ETC and ISC) <p>Working Group# 4 – Judy Thompson (lead), Mike Davidson, Darlene Krieger, David Ailor, Matt Frederiking</p> 	Ongoing committee updates