



Canadian Food
Inspection Agency

Agence canadienne
d'inspection des aliments

Canadian Food Inspection Agency



Our vision:

To excel as a science-based regulator, trusted and respected by Canadians and the international community.

Our mission:

Dedicated to safeguarding food, animals and plants, which enhances the health and well-being of Canada's people, environment and economy.

Animal Feed Division Feed Regulatory Renewal Update for AAFCO January 2015

*Judy Thompson
Animal Feed Division, CFIA*

 Canada

Presentation Outline

1. Legislation Update
2. Update on the feed modernization project
 - Regulatory Modernization Framework Proposals & Stakeholder Feedback
 - Ingredient Review Project
3. Inspection Modernization
4. Consolidated Proposal
5. Next Steps



1. Legislation Update – *Agriculture Growth Act*

- Tabled by Minister of Agriculture and Agri-Food on December 9, 2013.
- **Passed the House of Commons on November 24, 2014.**
- Proposes to make amendments to CFIA Acts:
 - *Agriculture and Agri-Food Administrative Monetary Penalties Act;*
 - **Feeds Act;**
 - *Fertilizers Act;*
 - *Health of Animals Act;*
 - *Plant Protection Act;*
 - *Seeds Act;*
 - *Plant Breeders' Rights Act.*



2. Update - Feed Regulatory Modernization Project

Objectives for the review of the *Feeds Regulations*

Develop a modernized risk- and outcome- based regulatory framework for feeds which:

- ✓ safeguards feeds and the food production continuum
- ✓ attains the most effective and efficient balance between fair and competitive trade in the market
- ✓ minimizes regulatory burden



2. Update on the Feed Regulatory Modernization Project

Project Plan - Phased Approach

Phase	Timeline
Environmental Scan	Completed (2011-12)
Pre-consultation	Completed (2012)
Development & Consultation on Proposed Framework	January 2013 – Fall 2014
Development & Consultation on proposed User Fees	Fall 2014 – Fall 2015
Preparation and Pre-publication (CG Part I)	Fall 2014 – Spring 2015
Final Publication (CG Part II)	To be determined

2. Update - Feed Regulatory Modernization Project

CFIA released a series of proposals for public comment:

- A. Feed Ingredient Classification & Authorization**
(Completed - Consultation closed December 2013)
- B. Feed Labelling**
(Completed - Consultation closed December 2013)
- C. Feed Hazard Identification and Preventive Controls**
(Completed - Consultation closed July 25, 2014)

A. Feed Ingredient Proposal

Current Situation

- New ingredients are assessed for safety, efficacy, and validation of claims in order to be authorized.
- In some cases, mixed feeds (multiple ingredients) are further assessed for efficacy and claims, and may require registration.

Proposal

- Use broader range of approaches to continue assessment of new ingredients for safety to animals, humans and the environment
- Agency's role in assessing **Fit for purpose** and **Claims** with regards to new ingredient characterization and authorization will be focussed more narrowly on safety.

A. Ingredient Proposal - Stakeholder Feedback

Key Respondent Messages

- ✓ There was widespread support for continuing to manage authorized ingredients by way of a positive list
- ✓ Regulated industry is supportive and willing to work collaboratively with the CFIA to update the positive list of authorized ingredients and develop and implement a list of allowable ingredient claims (to replace the process of pre-market assessment and authorization of claims by the CFIA).
- ✓ Proposed modifications of requirements associated with the assessment of feed ingredients also supported i.e.
 - accepting applications submitted to other countries, accepting authorizations granted by other countries using equivalent authorization systems to Canada's

B. Feed Labelling Proposal

Current Situation

All feeds must have, or be, accompanied by a label

The labelling requirements generally include:

- Contact information
- Basic information about the feed (name, purpose guarantees, directions, amount)
- Required cautions and warnings (e.g. medications, prohibited material)
- Additional label information typically triggers product registration

Proposal includes:

Increased flexibility (e.g., additional guarantees, allow other label information)

Increased international alignment (e.g., list of ingredients, lot #)

Address gaps in current regulations (e.g., compel caution statements)

B. Labelling Proposal - Stakeholder Feedback

Key Respondent Messages

- ✓ Feed industry associations indicated that they consider the requirements in the proposal will not reduce the compliance burden and will be costly for the industry.
- ✓ Very few comments were received from livestock producers, either from organizations or individuals
 - as they constitute a large proportion of purchasers of feeds, the limited comments received focussed mostly on a desire for ingredient listings on labels, controls over imports, and that regulatory burdens are minimized.

CFIA will be reconsidering proposal to modernized feed labelling

C. Feed Hazard Identification and Preventive Controls Proposal

Current Situation

- CFIA takes a tiered approach, in regulation and administratively, to the identification of hazards and providing guidance on maximum acceptable levels in feed
- Current regulations largely silent on requiring preventive controls/preventive control plans to be in place for feed manufacturing – focus of existing requirements are on BSE transmission prevention

Proposal

- Require hazard identification and preventive control plans for feed/ingredients along entire feed supply chain
- Ag Growth Act to provide authorities to make regulations in this regard

C. Hazard ID Proposal - Stakeholder Feedback

- There is support for shift from a product-based framework to an outcome-, risk- and systems-based framework, however:
 - Respondents recommended that guidance should be developed in collaboration with regulated industry and outreach/education/training be provided to assist understanding and compliance with new requirements
- Stakeholders were in agreement that:
 - Everyone should be responsible for assessing the risks in their business
 - The hazards that are identified in the proposal (Table 2) are the minimum that should be considered
 - The CFIA should be able to take action when animals have been exposed to toxic substances

C. Hazard ID Proposal - Stakeholder Feedback

- Additionally, respondents indicated that CFIA should consider recognizing foreign feed/food safety programs under which imported feeds/ingredients may be produced
- Respondents raised concerns that:
 - Increasing the scope of the hazards to include animal health, the environment and plant health would be onerous
 - It was unclear how framework would apply to on-farm producers, especially for hazards beyond scope of current programs (e.g. Canadian Pork Council's Canadian Quality Assurance)

Feed Ingredient Review Project

- ✓ In response to consultation/feedback on Feed Ingredient Assessment and Authorization module, CFIA has initiated a comprehensive, collaborative review project for authorized feed ingredients
- ✓ CFIA:
 - completed preparatory work during spring & summer of 2014
 - distributed a revised proposed structure for a modernized positive list of authorized ingredients for consultation in September 2014
 - included an invitation to stakeholders to collaborate with CFIA in a more detailed ingredient review process



Feed Ingredient Review Project (con't)

- ✓ “Pilot” review project initiated for oilseed products (~ 40) in collaboration with Canadian Oilseed Processors Association (COPA) during September/October 2014
- ✓ Project with COPA to be completed prior to moving on to the review of a new grouping of ingredients



3. Inspection Modernization

Innovative Features of New Model (iAIM)

- Risk-based "permissions" (licenses, registrations, permits etc.) and preventive control plans are key underpinnings of model
- Inspection oversight to be risk based - better application of intelligence to determine risk
- Inspection approach to be consistent across CFIA programs
- Single strategy for compliance and enforcement to provide consistent and appropriate response across food
- Systematic assessment of performance embedded in approach to ensure continuous improvement

4. Consolidated Proposal

As a next step, a Consolidated Proposal being developed for consultation that will:

- A. Integrate first three modules
 - Demonstrate how they will work together to provide a robust, risk-based regulatory framework
- B. Add information on facility licensing/enforcement
 - Demonstrate how the principles of iAIM will apply in a Feed context
- C. Address additional policy issues not addressed in proposals/consultations to date

4. Consolidated Proposal

C. Additional Policy Issues identified

- ✓ Species to which the Regulations apply
- ✓ Traceability of feeds
- ✓ Oversight of Feed Exports
- ✓ Oversight of Feed Imports
- ✓ Registration of Mixed Feeds
- ✓ Exemptions/Permissions (Licences, registration)

4. Consolidated Proposal

C. Additional Policy Issues - Feed Imports

Current Situation

- CBSA/CFIA oversight at the border for lower risk ingredients – conformance with AIRS requirements
- Pre-market registration of certain higher risk ingredients and all mixed feeds (regardless of country of origin)

Issues

- Changes in source countries & manufacturing processes have changed the risks posed by imported feed ingredients and products
- CBSA/CFIA oversight at the border is reliant on information provided by the importer; opportunity to identify/inspect high-risk products at the border is limited
- Post-entry compliance most often verified at commercial feed mills, but they're not able to correct any problems

4. Consolidated Proposal

C. Additional Policy Issues - Feed Imports

Options

1. Rely on some form of ingredient/product registration for import control (similar to *status quo*)
 - Pre-market assessment considered burdensome by industry
 - Doesn't provide a level playing field
 - Inconsistent with Module 1 approach of reducing registration requirements
2. License importers and require preventive control plans
 - Aligns with Agency iAIM, SFCR approach; provides tools to improve regulatory oversight at appropriate point in supply chain
 - Increases scope of regulated parties; may be seen as intrusive
3. Increased border inspection
 - Resource intensive
4. Create a traceability requirement for importers
 - Improves ability to manage issues when a risk is identified
 - Doesn't provide tools to proactively address the safety of production methods

5. Next Steps

- ✓ Confirm policy direction on outstanding issues
- ✓ Review provisions of U.S. FDA supplemental FSMA feed rule
- ✓ Complete development of the consolidated proposal & release for consultation (early 2015)

Recap

CFIA has embarked on a comprehensive change agenda that includes legislative, regulatory and inspection delivery modernization

- ✓ Bill to modernize *Feeds Act* has been tabled
- ✓ Consultation on three (3) regulatory modernization proposals concerning feed ingredients, labelling and hazard identification/preventive controls have been completed
- ✓ Feed ingredient review project launched in fall 2014
- ✓ Modernized inspection model being finalized
- ✓ Development of a comprehensive, consolidated regulatory framework proposal underway for public consultation (release early 2015)



QUESTIONS



Feed Regulatory Modernization Project Contacts

Sergio Tolusso

National Manager

Animal Feed Division

Tel. (613) 773-7516

Fax (613) 773-7565

Sergio.tolusso@inspection.gc.ca Laura.scott@inspection.gc.ca

Laura Scott

Coordinator, Regulatory Development

Animal Feed Division

Tel. (613) 773-7527

Fax (613) 773-7565