

**Feed and Feed Ingredient Manufacturing Committee Report/Minutes**

Wednesday, January 14, 2015

2:30-4:00

2015 Mid-Year Meeting

San Antonio, Texas

**COMMITTEE RECOMMENDATIONS:**

**BOARD RECOMMENDATIONS:**

**ASSOCIATION ACTIONS:**

**Committee Participants:**

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

**Advisors present:** David Ailor, Bill Bookout, David Dzanis, David Fairfield, Matt Frederking, Matthew Gibson, Diane Loiselle, David Meeker, Jessica Meisinger, Richard Sellers, Charles Starkey

**Committee Report/Minutes:**

1. Meeting called to order by Judy Thompson at 2:30 pm CT. Members and advisors in the room and on the phone introduced themselves.
2. The minutes from the 2014 Annual Feed and Feed Ingredient Manufacturing Committee Meeting held on July 25, 2014 were voted on and approved on August 20, 2014. These were posted to the website. No further action is needed.
3. **Review of Action Items (See Attachment A for summary of updates)**
  - **Mineral Guidelines Working Group – Bill Burkholder**  
FDA has hired an ORISE Fellow who will be tasked with compositing the numbers and reviewing the literature. A proposal will be provided to the working group for with a view to providing the report to the whole committee by July 1, 2015.
  - **Emergency Response Working Group – Darlene Krieger**  
The working group has developed a table top exercise (4 hours) which will be conducted at the 2015 Feed Administrator’s Seminar in April 2015 in conjunction with training on ICS (1 hour). The intent is to have a larger exercise in conjunction with the 2016 Annual Meeting or 2017 Mid-Year Meeting. The scheduling of the extended tabletop will be discussed at the Board of Directors’ Meeting on January 15, 2015.  
**Update: Board of Directors has added the extended tabletop to the schedule for the 2017 Mid-Year Meeting**

The working group was also tasked with gathering and sharing information on emergency response and tabletop exercises. There are currently three folders in the Feed Bin:

- Emergency Plans – expectation is that states will insert current documents so that other states can use them as templates, examples, etc.
- ICS Forms – being populated by Darlene
- Tabletop Scenarios – expectation is that states will insert current documents so that other states can use them as templates, examples, etc.

The working group has completed their review and revision of the information on emergency response in the current OP – ICS-based. Committee members are to review the proposed new chapter for the OP (Attachment B) and provide suggestions for improvements to Darlene Krieger by February 28, 2015 for review by the working group. The working group will review the suggestions, develop a final draft for review by the committee and send it to the committee chair by July 1, 2015 for circulation to all committee members and advisors.

- **Feed Preventive Control Alliance Certificate Program Training Material – Mike Davidson**  
California has provided copies of the documents that they have developed to support FSMA implementation. Three folders are currently in the Library on the Feed Bin so that everyone has access. The folders are:
  - Prerequisite Program Outreach and Education
  - Hazard Analysis
  - Preventive Controls
- **Education and Training Committee Liaison – Ken Bowers and Bob Geiger**  
Ken and Bob provided a quick update to the Committee about the work on the job task analysis (JTA) and the development of the Animal Feed Curriculum with the International Food Protection Training Institute (IFPTI). The JTA is completed and the work on the curriculum is progressing well. Rance Baker from the National Environmental Health Association (NEHA) has discussed the possibility of developing a test using the funding from FDA (this is the last year of a five year grant). Tim and Judy are going to discuss this opportunity with the Board of Directors at their meeting later this week as this initiative will require SMEs for a minimum of three one-week face-to-face meetings in an already busy year.

#### 4. AAFCO Committee Structure Survey

##### A. Work Process Change Questions

1. Is the process of running new language through the Model Bill Committee for placement and review for conflicting language necessary? **Yes, Yes, Yes**
2. Is the lateral movement of motions/business between Committees with Board of Directors knowledge working for the Feed and Feed Ingredient Manufacturing Committee (FFIMC)? **Yes, Yes, Yes**

B. Organizational Structure Change Questions

1. Are the changes made in 2010 working for FFIMC?  
**Everything is working well. Task force work continues to go forward more efficiently.**
2. Do we have time to address all the issues brought to the combined committee (FFIMC)?  
**Yes**
3. Did the formation of the combined Committees add value and/or efficiencies to AAFCO?  
**Yes, Yes, Yes**
4. Are there any other changes to committee structure that would be useful? For example:
  - a. With National Pet food labeling regulations on the horizon do we need to maintain a separate Feed Labeling and Pet Food Committees or could we combine them?  
**No, No, No – keep them separate**
  - b. Should the Finance Sub-committee be housed under the BOD instead of the Strategic Affairs Committee?  
**No comment**
  - c. Others? Please provide details.  
**Current structure is pretty much perfect!**

5. **US Federal Regulatory Update – Eric Nelson**

The FDA is reorganizing their structure and work to improve alignment between ORA and the Centres, remove duplication and improve efficiencies. Commissioner Hamburg has published 6 program alignment action plans (drugs, devices, food/feed – for CVM). Action plans have similar elements – organizational specialization versus generalists.

i. **Organization Specialization**

Trying to fine-tune approach through the development of cadres where the investigators are specialized. The goal is to align compliance branches from the field to the Centres. Currently reporting is field  $\Rightarrow$  supervisor  $\Rightarrow$  compliance branch  $\Rightarrow$  Centre. In future, want to involve the Centres right from the beginning. FDA is developing a workplan to facilitate this shift. Also in the process of hiring ORA Program Directors (Sr. Executive Staff Function) who will be involved in policy discussions.

**ii. Training/Retention**

Training and retaining field investigators is an ongoing issue. Succession planning is an issue as folks tend to move on as soon as they become specialized enough.

**iii. Workplanning**

There is an initiative to move to multi-year workplanning with improved establishment inventories. Inspection decisions will continue to be informed by risk.

**iv. Compliance Policy and Enforcement**

- Compliance policy and enforcement will also be modernized – risk-based versus line item/specific citation.
- Also working on development of public health metrics to provide evidence of benefits to public health.
- Guidance documents provide the FDA’s current thinking but it takes too long to launch. Trying to streamline approach to provide the guidance more quickly.

**v. Imports**

- With a global market comes more entries. Not using all the tools available, e.g., Predict (electronic tool) – firms, products, practices.
- Centralize review of data
- Screening at entry points to speed up process.
- Push decisions to level where they are the most effective, e.g., District rather than Centres

**vi. Laboratory Optimization**

- Resource planning
- Streamline the assignment process for emerging issues.
- Laboratory data to be used for risk decision making processes.
- Laboratory operations – cross program coordination. Optimize resources.

**vii. Information Technologies**

- IT involvement – enhanced internal and external information sharing. Standardized terminology, uniform data platforms.
- Transparent information on the FDA web page (add link to minutes)
- Need to efficient in order to support the big initiatives that are coming on stream FSMA, FDASA

More information available at the following:

<http://www.fda.gov/AboutFDA/CentersOffices/ucm416941.htm>

## **6. Preventive Control Alliance (David Fairfield, NGFA, Pat Tovey, PFI, Sonya Lambkin, FDA)**

### **Steering Committee**

David Fairfield provided information on the history and activities of the Steering Committee. In 2011 funding was provided to establish the FSPCA to develop a standardized curriculum to assist industry in complying with FSMA. Steering Committee provides oversight and direction to the Animal Food Sub-Committee. The Steering Committee includes animal food representatives including Anita McMullen, Bob Waltz, Sonya Lambkin, Pat Tovey, Henry Turlington and David Farifield. The Steering Group meets at least twice a year and currently is having monthly conference calls. The Animal Food Sub-Committee is meeting from 7:00-7:50 am tomorrow. Open meeting for those interested. The Animal Food Sub-Committee is producing a separate curriculum for food for animals.

### **Deliverables**

Pat Tovey provided information on the work underway and how the Sub-Committee is organized. Three working groups:

- i. Training Editorial Committee (Training Manual, speaker notes, PPT slides). Using the materials developed by the Human Food Sub-Committee (15 chapters) and red-lining the material that is not applicable to animal food and identifying additional language required; nutrient deficiencies, etc. Next step is to take stock via conference call.
- ii. Hazard Guidance Committee – Industry and Academia. Have reviewed the material available on the food side. Want to make sure it is a good tool/template for regulated parties. Topic for tomorrow's discussion.
- iii. Development of Food Safety Models (7-8 examples). People involved in the training will have access for the variety of animal foods being manufactured.

Each group working on their own time lines. Final rule August 30, 2015 with 1, 2 and 3 year compliance dates. October 2015 is the target for completion so there is time for the training to take place before the FSMA Implementation.

### **Training**

Sonya Lambkin provided additional information on the training to be provided to industry and investigators. Course will also be used with the Investigators – most likely as a prerequisite to other training to assist the investigators in assessing compliance. Hoping for a mix of folks at the training courses so everyone is on the same page. Not a requirement to take the course. Need to have experience and training to meet the FSMA requirement for a qualified individual – this curriculum will satisfy the requirement.

Fee = Tentatively \$50 for issuance of the certificate and some admin costs plus whatever the instructors decide to charge for their training session. Market forces will establish the costs.

Transparency – Developing materials using the materials developed by others so need to respect their concerns. Want to make sure that the materials provide the best guidance so the Alliance won't be releasing documents until they are finalized. For more information check out the following links: <http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm284406.htm>  
<http://www.iit.edu/ifsh/alliance/>

**7. 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)

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

ISO TC34-SC17 Work Group 9 was formed as a result of an ISO July 2014 affirmative vote to establish a technical specification that prescribes prerequisite program requirements for animal feed and pet food. The American National Standards Institute (ANSI) is the designated U.S. organization that conveys the United States' interests within ISO deliberations. The American Oil Chemists' Society (AOCS) serves as the ANSI-accredited administrator for food/feed related issues. Working Group 9 met in Copenhagen September, 2014. The WG will meet again in Washington, DC in February 2015. A third, and potentially final, meeting will be held in Paris October 13-15, 2015. The work of this group will be incorporated into the ISO 22000 standard. This may have an impact on current feed safety schemes that reference ISO. The AOAC Technical Advisor Group includes Henry Turlington (AFIA), Peter Tabor (PFI) Dave Harlan (Cargill), Dave Fairfield (NGFA). A decision within the working group still needs to be made on scope of the technical specification, i.e., should the technical specification apply solely to animals for food production or also include pet foods. The technical specification is to be completed by June 2015.

**9. Meeting adjourned at 4:00 CST as there was no other business.**

**Attachment A - Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing / Status</b>
Mineral Guidelines Working Group	Review and Revise Mineral Guidelines	Working group to develop plan to review and revise Mineral Guidelines in the OP for discussion by the Committee <b>Workgroup Members:</b> Bill Burkholder (lead) Jon Nelson, Tim Costigan, Jennifer Kormos David Syverson, Bill Hall, Dave Dzanis, Roger Hoestenbach <b>Update</b> FDA has hired an ORISE Fellow who will be tasked with compositing the numbers and reviewing the literature. A proposal will be provided to the working group for review with a view to providing the report of the whole committee by July 1, 2015.	Document to committee July 1, 2015  Update at August 2015 Annual Meeting
Darlene Krieger	Strategic Plan – Emergency Response	Working Group to: <ul style="list-style-type: none"> <li>review and revise the information on emergency response in the current OP (<b>drafted – comments due to working group by February 28, 2015</b>)</li> <li>develop a folder in the Feed Bin for States to place any table top exercise materials they may have for others states to use (<b>completed</b>)</li> <li>develop a table top exercise that could be used at an upcoming AAFCO meeting <ul style="list-style-type: none"> <li><b>Tabletop exercise planned for April 2015 Feed Administrator’s Seminar</b></li> <li><b>Larger tabletop exercise to be held in conjunction with the 2017 Mid-Year Meeting</b></li> </ul> </li> </ul> <b>Workgroup Members:</b> Darlene Krieger (lead), Glo Dunnavan, David Fairfield, Dragan Momcilovic, Tim Darden, Mark Glover, Stan Cook, Tim Lyons	Update at August 2015 Annual Meeting
Mike Davidson	BOD Request – Review Feed Preventive Control Alliance Certificate Program Training Material	Provide updates on training material development in regular committee reporting. Industry: David Ailor, NOPA; David Fairfield, NGFA; David Meeker, NRA; Henry Turlington, AFIA Academia: Kim Koch, North Dakota State University; Dr. Charles Hurburgh, Iowa State University FDA: Kim Young, Sonya Lambkin, Dianne Milazzo AAFCO: Mike Davidson, Judy Thompson, Dan Danielson, Tim Lyons	Ongoing reporting of PC Alliance activities Update at August 2015 Annual Meeting
Bob Geiger/ Ken Bowers	Education and Training Committee Request – Liaison between FFIMC and ETC	On an ongoing basis, confirm FFIMC training needs and keep Education and Training Committee (ETC) informed of current events within FFIMC.	Ongoing liaison Update at August 2015 Annual Meeting