



Feed & Feed Ingredient Manufacturing Committee

2017 AAFCO Midyear Meeting

January 17, 2017

Mobile, Alabama

3:30 PM – 5:00 PM

Committee recommendations to Board and membership:

None

Committee Action Items:

1. Mineral Guidelines Working Group: Revise the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients”.
2. Emergency Response Working Group: Plan 2017 Tabletop Exercise. Work with Education and Training Committee and Jennifer Roland if necessary.
3. FSMA Implementation Task Force – Working Group 3
Create action plan to determine the processes of implementing the decision making and method development.
4. Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections:
Perform gap analysis of FSPCA training for inspectors to determine if AAFCO needs to provide additional training for state inspectors.

Committee Minutes 08/02/2016

Committee Participants

Members Present:

Eric Brady – TN (Co-Chair); Bob Church – MT; Ken Bowers – KS; Bob Geiger – IN; Darlene Krieger – FDA; Tim Darden – NM; Laura Scott – Canada; Doug Lueders – MN; ; Laura Scott – CFIA;

Via Telephone: None

Advisors Present:

Lorri Chavez – PFI; Pat Tovey – PFI; David Meeker – National Renderers Association; Richard Sellers – AFIA; David Dzanis – APPA; David Fairfield – NGFA

Committee Report/Minutes

Eric Brady called the meeting to order at 3:33 PM EST. Members and advisors in the room introduced themselves.

Introductions and Agenda Review, Eric Brady

Canadian Food Inspection Agency Update - Laura Scott

See Attachment A

Nancy Cook – How close do the findings compare to AAFCO documents? To ingredient definitions?



Approvals?

Continue to be aligned as they currently are and take into consideration the EU and FSMA changes.

Review of Action Items

Mineral Guidelines Working Group – Bill Burkholder

Working group has not yet finalized their revision of the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients”. in the OP but is hoping to have a submission of October 2016.

Strategic Plan – Emergency Response - Darlene Krieger

Recommendation was made to the Board to replace the AAFCO Model Emergency Response Preparedness Guidance Document with revised language following the 2016 Mid-Year Meeting in Isle of Palms. The Board will review the document and will vote to include it in the next printed Official Publication. Tim Darden will be the new Section Editor, replacing Darlene Krieger.

The Working Group has planned an Emergency Response Tabletop Exercise to be held in conjunction with the AAFCO 2017 Mid-Year Meeting in Mobile Alabama (January 16 – 18th).

- Sunday, January 15, 2017
- Save the Date will go out shortly
- Workshop will last 6 hours
- Lunch will be provided
- Will consist of regulatory, industry and laboratory representatives
- The working group will reach out to Dave Fairfield of NGFA to ensure industry participation.
- Working Group consists of: Darlene Krieger (lead), Glo Dunnavan; Dragan Momcilovic, Tim Darden, Stan Cook, Tim Lyons and David Fairfield.

Roger Hoestenbach, section editor of the AAFCO Model Emergency Response Preparedness Guidance Document, recently retired. Tim Darden has been chosen to be the new section editor.

FSMA IMPLEMENTATION TASK FORCE UPDATES

Working Group #1 – Strategy for AAFCO GMPs - Ken Bowers

Working Group Charge: Develop a plan for states that have adopted AAFCO’s Model GMPs to make the transition to FSMA GMPs.

3 states have adopted the AAFCO CGMPs however the current CGMPS are being deleted from the OP Ken Bowers moved to disband the working group and Bob Church seconded the motion. Motion passed to disband the working group.

No further action is necessary.

Working Group #2 - Model Feed Safety Program Plan in the OP– Bob Waltz

Working Group Charge -

Recommendation to the Board following Mid-Year Meeting in Isle of Palms was to remove the AAFCO Model Feed Safety Program Plan from the OP, where it will be archived in the Feed Bin.

UPDATE: This request was approved by the AAFCO Board of Directors on September 7, 2016. See Attachment: Board Minutes 09/07/2016

Working Group #3 – Contaminant and Hazard Lab Strategy - Bob Waltz/Mike Davidson

Working Group Charge: Following the identification of contaminants and hazards by FSPCA/FDA, the



group will determine action levels and enforcement strategies to provide guidance to the Lab Methods and Services Committee (LMSC) in order to develop a priority list of method development. This Working Group will work in consultation with the FSPCA, Enforcement Issues Committee, Inspection & Sampling Committee, Ingredient Definition Committee and the LMSC

The Alliance will reference the EU list and the documents will come in a series of releases, not all at once. Linda Morrison referenced the 2017-2020 AAFCO Strategic Plan – is there a list of expected method developments? Response: At this moment, it is not clear how it will all work.

Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections - Mike Davidson
Working Group Charge: Review materials developed by FSPCA and FDA to determine whether training material for feed ingredient manufacturing from the FSPCA will meet the needs of Inspectors in regards to training. Working group will work in consultation with the Education & Training Committee and the Inspection & Sampling Committee

The curriculum for Inspectors from FSPCA can be downloaded online at: <https://www.ifsh.iit.edu/fspca/fspca-preventive-controls-animal-food>

Linda Morrison – Has a review of this to see what’s missing; a gap analysis may need to be completed? Response: At this moment, no, a review as not been completed.

Industry Updates

American Feed Industry Association (AFIA) – Richard Sellers – See attachment B

National Grain and Feed Association (NGFA) – Matt Frederking

National Grain and Feed Association (NGFA) - Matt Frederking

The NGFA began conducting regional one-day seminars in March 2016 to educate industry members on the new rules being promulgated by FDA to implement FSMA. The seminars were conducted in cooperation with state feed regulatory agencies and state and regional associations affiliated with NGFA to help industry members understand the changes, requirements and appropriate exemptions included in the FSMA rules. More than 1,200 industry representatives attended the 16 regional seminars offered by the NGFA during 2016.

The NGFA is actively involved in delivering FSPCA preventive controls qualified individual training to the animal food industry since the roll-out of the curriculum in June 2016. The NGFA will cooperate with Kansas State University's International Grains Program Institute to deliver four courses in 2017. In addition, the NGFA will be partnering with state feed regulatory agencies and other industry stakeholders to conduct additional PCQI training courses during the year.

The NGFA and American Feed Industry Association (AFIA) have partnered to develop a scientific database of animal food hazards that companies will be able to use when completing their own evaluation of hazards as required by the FSMA-related rule for preventive controls for animal food. With funding provided by NGFA's and AFIA's respective foundations, the University of Minnesota College of Veterinary Medicine's Center for Animal Health and Food Safety has reviewed available scientific literature and FDA recall information and developed a database tool that summarizes the occurrence of

hazards that have caused animal food safety incidents. The database tool is expected to be made available



to members of the NGFA and AFIA in April.

Pet Food Institute (PFI) – Pat Tovey

In July 2016, PFI co-instructed in a Food Safety Preventive Controls Alliance combination training course along with staff from AFIA, NGFA and NRA. 75 lead instructors were issued certificates granting their status as lead instructors in the Animal Food Curriculum.

Pet Food Institute members developed a model Hazard Analysis for groups of ingredients typical for pet food use. This model is available on the PFI website for use by members.

In May 2016, PFI unveiled its new and updated webpage. The webpage contains material for PFI members as well as information for media or the general public.

Also, PFI recently sent an open letter to small pet food businesses as a reminder that we are approaching many of the Food Safety Modernization Act's compliance dates. The letter urges small manufacturers to reach out to the Food Safety Preventive Controls Alliance or PFI if any assistance is needed to comply with these rules under FSMA. A copy of the letter was shared with the AAFCO Board of Directors and state regulators can receive a copy by contacting PFI. During the update PFI asked AAFCO members to please pass this information along to any pet food manufacturers in their state that may benefit from this direction.

National Renderers Association – David Meeker

On behalf of the National Renderers Association, David Meeker reported that the rendering industry has been using GMPs and preventive controls for more than 10 years in their voluntary Rendering Code of Practice and thus are prepared to implement FSMA. He also complimented FDA for working cooperatively with the industry in developing the very good FSPCA training curriculum for both PCQIs and inspectors.

National Oilseed Processors Association (NOPA) – Dave Ailor –

Reported that David Ailor was leaving NOPA effective May 31, 2017, and that he hoped his replacement, Lorraine Gershman, would be joining him at the last meeting, the 2017 Midyear Meeting. DCA

Other Business:

Jon Nelson had a question about FSCPA Lead Instructor Registration – processes had just started There will be a course at Kansas State August 9th. All courses are listed on Alliance website at: <https://www.ifsh.iit.edu/fspca/fspca-preventive-controls-animal-food>



Responsible	Item	Action	Timing / Status
Mineral Guidelines Working Group	Mineral Guidelines	To review and revise the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients”. Working Group: Bill Burkholder (lead), Jon Nelson, Tim Costigan, Jennifer Kormos, David Syverson, Bill Hall, David Dzanis, Roger Hoestenbach (now retired) Will Roger Hoestenbach need to be replaced?	Tentative: October 2016
Strategic Plan Emergency Response Working Group	Roundtable Exercise	Host the exercise prior to the 2017 AAFCO Mid-Year Meeting	January 2017
FSMA Implementation Task Force – Working Group 3	Hazard & Contaminant Action Levels and Enforcement Strategies	Work with FSPCA, EIC, ISC, IDC and LMSC to develop a prioritized list of method development once list of contaminants and hazards has been identified by the FSPCA and FDA. A plan of action should be created by the working group to determine the processes of implementing the decision making and method development.	Update January 2017
FSMA Implementation Task Force – Working Group 4	Inspector Training Development	Gap Analysis performed on FSCPA training to determine if there is any missing education that should be provided to inspectors whom perform feed ingredient manufacturing inspections	Update January 2017

