

Feed & Feed Ingredient Manufacturing Committee

2022 AAFCO Annual Meeting August 5, 2022, St. Louis, MO

Committee recommendations to Board: NONE

Committee Action Items:

- 1. Mineral Guidelines Working Group: Revise the "Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients".
- FSMA Implementation Task Force Working Group 3
 Create action plan to determine the processes of implementing the decision making and method development.
- 3. 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 1/19/2022

Committee Participants

Members Present:

Austin Therrell – SC (Co-Chair); Eric Brady – TN (Co-Chair); Ken Bowers – KS; Ben Jones - TX; Shaness Thomas - FL; Laura Scott – CFIA; George Ferguson – NC; Dr. Jonathon Roberts – LA; Jessica Gore – NC; Trish Dunn – IN; Charlie Hubenka – NE, Ashlee-Rose Ferguson, WA

Via Telephone: None

Advisors Present:

Pat Tovey – PFI; Amanda Anderson – PFI; David Meeker – National Renderers Association; Louise Calderwood – AFIA; David Fairfield – NGFA; Linda Morrison – LIFE; James Emerson – US Poultry Association; Dan Frank – AFIA; Kathy Alinovi - NGPMA

Committee Report/Minutes

Eric Brady called the meeting to order 8:00 am. Members and advisors in the room introduced themselves.

Introductions and Agenda Review, Eric Brady

NEW MEMBERS: Charlie Hubenka, Trish Dunn, Jessica Gore

Review of Action Items
Mineral Guidelines Working Group - Therrell

Austin – Approved during business meeting of Annual Meeting in August 2022.



FSMA IMPLEMENTATION TASK FORCE UPDATES

Working Group #3 - Contaminant and Hazard Lab Strategy - Brady

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

Eric – Communication has been improved between the LMSC. Gap has been bridged by lab and regulatory. Gathering methods. Retooling of survey for more targeted response. Survey will be delivered after meeting. Expect report from survey results in San Antonio.

Working Group #4 - Inspector Training for Ingredient Manufacturing Inspections - Brady

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

Standardized Advanced Inspector Training, inspectors were provided good foundation. Ingredient Verification tool was demonstrated for inspectors. Real life scenarios were utilized for veteran inspectors. Gained positive response. Skillsets are being built.

Therrell – Austin developed documents for breakout sessions. Successful demonstration. Seeking input from states that are using this in the field.

Brady – Thank you Austin for providing subject matter experts to the training.

Canadian Food Inspection Agency Update - Laura Scott

See Appendix A.

Other Business: Nutrient Contaminant Workgroup

Multiple meetings have been held. Provide links to other resources and make easily accessible repository of information. Went through species by species. We have to figure out the best display mechanism. We are waiting on technology pieces.

Tovey – scope and focus concerns. Identified good resources. Should we reproduce the results we found? List the resources? Recommend strong communication plan. Start conversation.

Louise – Took a little over an hour to find resources to complete assignment. If I worked for a state I would have access to state vet or extension. Question need for exercise.

Therrell – we will decide direction.

Consideration to review the voluntary self-inspection program in Section 5 of the OP.

Therrell – VSIP working group recommended to MBRC to remove section.

Tasked with review of National Medicated Feed Program section pg 263 of the OP. Outside of scope.



Therrell Motion to form workgroup to review.

Bowers Seconds

Motion Carries.

Workgroup

Ben Jones

Eric Brady

Jonathon Roberts

Dave Fairfield

NEW BUSINESS-

George Ferguson - IPPE Atlanta, Visit IPPE. More courses for LMS system.

AFIA has courses.

What is available for on time training...videos.

Kansas State has incredible wealth of information.

Advantages of equipment review training.

FFIM work with ETC – Develop training. Request funding. Create workgroup.

Brady- Motion to create workgroup to develop on-time training material of feed manufacturing equipment.

Bowers Seconds

Motion Carries.

Meeker comments on some material available.

Therrell realizes materials expensive.

Fairfield – what would it be used for? What happens next?

Therrell – Starting training process. Significant amount of time on training new inspectors, before training on regulations begins. Resource for utilizing time management on how facilities operate.

Fairfield – Evaluate programs and processes.

Leah – Where do you start? Very complex topic. Lots of video available. How to bridge that gap for understanding. Have AAFCO meeting in Atlanta.

Ferguson- Thank you Leah. Pick one topic and see how to goes. Intended to make inspectors comfortable. We don't expect things to be free. Get inspectors understanding of equipment before they walk in.

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)	Approved
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 2023
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 2023

Meeting Adjourned.



APPENDIX A

AAFCO Canada update – Aug 2022 Laura Scott, Canadian Food Inspection Agency

1) Canadian Feed Regulations update

The CFIA published proposed new feed regulations for consultation from June-October of 2021 in the Canada Gazette (the Canadian version of the federal register). CFIA received approximately 80 sets of comments on the proposal. The comments are available online on the Gazette website. CFIA has been reviewing the comments and adjusting the regulatory text as needed. A "what we heard report" will also be published to summarize the feedback received and to address many of the comments.

It is anticipated that the new regulations will be published in the first half of 2023. Once published, the new rules will come into effect. There will be staggered coming in to force to help provide time for people to get ready. Any of the new provisions with respect to registration and labelling flexibilities will come into effect right away. In addition, the labelling provisions will have a 1 year transition period where either the old or new rules can be followed. The new requirements for preventive control plans will not come into effect until 1 year after that final publication, and then licensing will come into effect 6 months after that.

CFIA will be providing guidance and information sessions closer to the time of publication and coming into force.

Consultation and comments: <u>Canada Gazette</u>, <u>Part 1</u>, <u>Volume 155</u>, <u>Number 24</u>: Guidance from the consultation: <u>Feed regulatory modernization - Canadian Food Inspection Agency</u> (canada.ca)

2) Guidance updates

Gut modifiers: CFIA has launched a consultation on guidance for registration requirements for gut modifier products. Gut modifiers as livestock feed are products that, once fed, have a mode of action in the gastrointestinal (GI) tract of an animal. They achieve this by acting on the feed itself while in the gut or by modifying the GI environment to provide a benefit to the animal as may be linked to a nutritional effect. These products require registration before they can be sold in Canada. The consultation is available on the CFIA website and comments and feedback are welcome until September 19, 2022.

Gut modifier consultation: Share your thoughts: Consultation on registration requirements for gut modifier products - Canadian Food Inspection Agency (canada.ca)

Veterinary Health Products –CFIA launched a pilot project to allow some veterinary health products (VHPs) to be used in livestock feeds. In April 2022 the guidance was updated to also allow these VHPs to be used in feeds that contain a medication. CFIA continues to work with colleagues at Health Canada in preparation for the new feed regulations which will allow all VHPs to be allowed to be used in livestock feeds.

Veterinary health products guidance: <u>Veterinary health products for use in livestock feeds: guidance for feed manufacturers</u> - Canadian Food Inspection Agency (canada.ca)

Permissible Claims – CFIA has published guidance on permissible claims for use on feed labels. This



guidance provides information on which claims are allowed to be used on feed labels without the need to register the feed. At this time, it is limited to claims related to method of production, such as "this feed is suitable for use as part of the raised without the use of antibiotics program". The guidance also provides clarity on the use of certain statements on feed labels such as "HACCP certified".

Permissible Claims guidance: <u>4.12 - RG-1 Regulatory Guidance: Chapter 4 - Labelling and guarantees - Animal health - Canadian Food Inspection Agency (canada.ca)</u>

3) Electronic submissions

CFIA is excited to announce that we've launched our new online portal for registrations - MyCFIA. Companies are encouraged to create a profile and submit their registration applications online. The existing guidance on how to apply for feed registration has been updated to include information on how to use MyCFIA. This portal and electronic submissions is a great step forward and brings some great new features.

How to register a feed: <u>1.3 - RG-1 Regulatory Guidance:Chapter 1 - Administrative Requirements for Pre-market Assessment and Product Registration of Livestock Feed - Animal health - Canadian Food Inspection Agency (canada.ca)</u>

MyCFIA: My CFIA - Canadian Food Inspection Agency (canada.ca)