FINAL: March 19, 2014

Feed and Feed Ingredient Manufacturing Committee Report/Minutes
Thursday, January 9, 2014
10:30-12:00
2014 AAFCO Mid-Year Meeting
New Orleans, Louisiana

COMMITTEE RECOMMENDATIONS: Approved by committee to be sent to the board for approval and sent to the membership for voting at 2014 Annual Meeting.

BOARD RECOMMENDATIONS: None

ASSOCIATION ACTIONS: None

Committee Participants:

Members present: Ken Bowers, Bob Church, Mike Davidson, Gloria Dunnavan, Jamey Johnson, Ben Jones, Darlene Krieger, Doug Leuders, Dragan Momcilovic, Shaness Thomas, Judy Thompson

Advisors present: David Ailor, David Dzanis, David Fairfield, Matt Frederking, David Meeker, Jessica Meisinger, Richard Sellers, Charles Starkey

Committee Report/Minutes:

1. Meeting called to order by Judy Thompson at 10:30 am EST. Members, advisors and guests introduced themselves.

2. The minutes from the 2013 Annual Feed and Feed Ingredient Manufacturing Committee Meeting held on Tuesday, August 13th, 2013 were voted on and approved on September 23, 2013. These were posted to the website. No further action is needed.

3. Review of Action Items (See Attachment A)

    - Work Group – FSMA Comments – Judy Thompson Requested Comments from the Committee. Work Group should have something put together in a couple of weeks.
    - Bill Burkholder – Reviewing current member list and it is not necessary to search for additional members (including retired member Dave Syverson).
    - Bill Burkholder will distribute materials to the group and intends to have something to the Committee by the Annual Meeting.
    - Strategic Plan – Emergency Response
    - Requested a follow up from the survey that was to be sent as an action item from the Mid-Year Meeting with a comment closing period of December 2013. This survey was not completed for the requested time but Gloria Dunnavan will have the survey completed and distributed by January 17th. Responses will be evaluated and a report will be provided to the Committee during the Annual Meeting in Sacramento.

4. Canadian Regulatory Update - Judy Thompson provided the Membership with a regulatory update of the current and planned changes for the Canadian Food Inspection Agency (CFIA). (See Attachment B)

   A question was asked regarding Canada's licensing requirements would apply to totally integrated facilities; response: CFIA doesn't differentiate between commercial facilities and on-farm facilities (other than farms no labeling requirements) though the inspection frequency for farms is considerably less intensive than that for commercial feed mills based on risk.

5. US Federal Regulatory Update/Discussion on Development of FSMA Feed Rule Comments

   Eric Nelson provided the Membership with the opportunity to follow up on the presentation he had given during the Current Issues and Outreach Committee. Sound legal and scientific comments are being requested. Richard Sellers asked for recognition of the extended comment period for the Preventive Control (PC) Rule of March 31st.

   American Feed Industry Association (AFIA) represented by Richard Sellers: Regarding the language carryover from the Human Food (PC) Rule, what was the reasoning the requirements for handwashing stations and other employee cleanliness requirement inclusion in the Feed PC Rule?

   FDA (Eric Nelson): The language carryover from the Human Food PC Rule is one of the reasons FDA is requesting sound legal and scientific comments for the Feed PC Rule, as some of the requirements may be unnecessary for feed manufacturers (additional examples: stainless steel sinks, etc.) AAFCO should also comment on this particular issue.

   - Nancy Cook requested a recap of what Eric Nelson had presented during the Current Issues and Outreach Committee for those that had not been able to be present.
   - All 5 proposed rules have been released for comment and are in draft status
   - Requested comments specific to 4 things:
     1. Are GMPs applicable across the board?
     2. Sound legal arguments regarding the very small business exemption values
     3. Is it reasonable to request the supplier verification as a component of the Feed PC Rule?
     4. Final product testing: this is currently not a component of the Feed PC Rule proposal but consideration as to whether or not it was valid for some products/all products/finished products?

   Pet Food Institute (PFI) represented by Peter Tabor: Question regarding supplier verification and the extent to which stakeholders will see the proposed language. Eric Nelson recapped the FDA procedure for releasing draft language for comment, then the release of the final interim rule, then another period of comment and review.

   Jon Nelson expressed concerns about FSMA's application to integrated operations. Eric Nelson responded that it's a possibility. With QA/QC methods already in place at these types of operations, most likely the applied burden would be minimal. Again, FDA recognizes that the proposed rules are expensive so again, comments are encouraged.

National Grain and Feed Association (NGFA) represented by Dave Fairfield: How does the Feed PC Rule deal with hazards reasonably likely to occur and management oversight?

FDA (Kim Young): The hazards reasonably likely to occur definition doesn't coincide as the definition doesn't come from the Food, Drug and Cosmetic Act.

AFIA (Richard Sellers): Questions regarding control production of product going into feed; for example mined products such as limestone, etc; as the ingredient will very as it's not manufactured but naturally occurring. Eric Nelson responded that the intended use of the product should be the focus.

Judy Thompson requested comments on supplier verification for feed manufacturers.

- PFI (Peter Tabor): requested flexibility/discretion for the manufacturer to choose what best works for their operation; a tool but not a requirement.
- AFIA (Richard Sellers): Not ready to comment on that yet.
- NGFA (Dave Fairfield): Not ready to comment but thinks that foreign and domestic supplier verification should come hand in hand.

Final Product Testing (currently not required)

AFIA (Richard Sellers): Could be potentially applied to the pet food manufacturers but not for livestock/food-producing animal feed and feed ingredient production. There's still some discussion as to what it applies to (nutrients was not the intent but more food safety concerns.

FDA (Eric Nelson): If environmental sampling was common practice and if it could be used to verify implementation of a critical control point. Not really for livestock/food-producing animal feed and feed ingredients but somewhat related to pet food manufacturing. Ultimately, the end product cannot be adulterated or misbranded and the current practices to confirm this are not ideal.

NGFA (Dave Fairfield): Flexibility should be provided. How can final product testing and environmental sampling be valuable to the industry?

Eric Nelson further explained that FSMA encourages FDA to partner with states and compels FDA to be more proactive and there are resources in the works to change how FDA functions. The goal is the production of safe food and feed, not because a FDA form 483 was issued and compliance required, but because compliance was achieved by the industry prior to inspection.

6. Industry Stakeholder Updates

AFIA: Safe Quality Food Institute Option 34 Safe Feed/Safe Food benchmarked. Global Food Safety Industry initiative. Pet Food Program benchmarked too.
Richard Sellers asked AAFCO if the organization planned to comment on the proposed regulations for Veterinary Feed Directives (VFD) and at this point in time, AAFCO has not assigned a group to do so. AFIA wants to ensure that the VFD process works better under the proposed regulations than it currently does now. AFIA also has concerns about whether or not training will be available for veterinarians.

NGFA: In conjunction with AFIA, NGFA will host two International Grains Programs at Kansas State in April and October of 2014.

National Renderers Association (NRA) represented by David Meeker: 110 plants – certified code of practice that is similar to a HACCP Plan which the Association hopes will comply with the PC Rules.

National Oilseed Producers Association (NOPA) represented by David Ailor: The Association has commented on the Human Food PC Rule.

PFI: No updates to provide.

Meeting adjourned as there was no other business.

Attachment A - Action Item Table

Responsible	Item	Action	Timing / Status
Judy Thompson	Establish working group and develop FSMA comments for Board of Directors	Recruit working group members and develop process for collecting comments. Working Group Members – Doug Leuders, Ken Bowers, Tim Darden, Judy Thompson (lead)	January 2014 Completed
		Draft comments for approval by BoD	March 12, 2014
Ali Kashani	Request NASDA comments	Request comments on food preventative controls from NASDA and provide copy to working group	Completed
Sharon Benz	Lead for Mineral Guidelines Working Group	Sharon Benz to identify lead from CVM for Mineral Guidelines Working Group	September 15, 2013 **Completed** – Dr. Burkholder has been identified as lead for this working group
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 at Mid-Year **Workgroup Members**: Bill Burkholder (lead) Jon Nelson, Tim Costigan, Jennifer Kormos David Syverson, Bill Hall, Dave Dzanis, Roger Hoestenbach	July 2014 Annual Meeting
Judy Thompson/ Glo Dunnavan	Strategic Plan – Emergency Response	Circulate proposed member survey and workplan for tabletop exercise to working group and FFIMC members and advisors and request comments to Glo by September 15, 2013 (Judy)	August 31, 2013 Completed
		Survey AAFCO members regarding their emergency response plans (Glo)	January 2014
		Evaluate survey responses and review current AAFCO Emergency Plan guidelines (Glo and working group) **Workgroup Members**: Gloria Dunnavan, (lead), Darlene Krieger, David Fairfield, Dragan Momcilovic, Liz Higgins, Tim Darden, Sergio Tolusso	July 2014 Annual Meeting

Attachment B – Canadian Regulatory Update PPT

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