

Attachment A

AAFCO Feed PC Harmonization Working Group Report AAFCO 2017 Midyear Meeting January 16, 2017

Objective: Review Commercial Feed Model Bill and Regulations. Identify updates and changes needed to harmonize them. This includes the Model Regulations for Pet Food and Specialty Pet Food.

1. **FSMA Animal Food Rules Harmonization** - *Membership approved these items on 1/16/17*

a. Attachment 2

Section 10 (c) Food and drug rules. Federal regulations contained in Title 21, Code of Federal Regulations, part 507, not otherwise adopted herein, also are adopted as feed rules of this state.

Regulation 11 Current Good Manufacturing Practices and Hazard Analysis and Risk-Based Preventive Controls

(b) Pursuant to Section 10 of the Act, the _____ adopts the requirements of Title 21, Code of Federal Regulations, part 507.

Section 11

(a)(2) to inspect at reasonable times and within reasonable limits and in a reasonable manner, such factory, warehouse, establishment or vehicle and all pertinent equipment, finished and unfinished materials, containers, and labeling therein. The inspection may include the verification of records, and production and control procedures related to the manufacture, distribution, storage, handling, use or disposal of commercial feed as may be necessary to determine compliance with this Act.

- b. Consider the deletion of the AAFCO Model Good Manufacturing Practice Regulations for Feed and Feed Ingredients and associated checklist from the AAFCO Official Publication (pages 228-237 of the 2017 OP) and replace the deleted information with an html reference link and a citation to the CGMP's Title 21, Code of Federal Regulations, 507.14-507.28.

2. **OP Editorial Edits** – incorporated into the 2017 AAFCO OP

- a. Summer 2016 meeting (Attachment 1)
b. October 2016 meeting (Attachment 3)

3. **Working Group Face to Face Meeting - October 17, 2016**

The AAFCO Feed Preventive Controls Harmonization Working Group held a face to face meeting in Gaithersburg, MD on October 17th to review the entire Model Bill and Regulations for consistency and uniformity. The Working Group, comprised of state, industry and consumer group members, was assembled in August 2015 to develop FSMA Harmonization language for the model bill and regulation. During this project, the group also identified inconsistencies with citations, definitions and other language in the model bill and regulations.

The Model Bill and Regulations Committee (MBRC) approved the Working Group's FSMA harmonization language in August 2016, and tasked the Working Group to continue with the harmonization/inconsistencies project. Editorial changes the Working Group made at the October 17th meeting will be included in the 2017 Official Publication. Best practices for

formatting and listing citations in the Model Bill and Regulations were developed by the Working Group. The Working Group agreed that it will move high priority updates forward quickly for implementation and prioritized its recommendations in the list as follows:

High Priority Recommendations

- Editorial updates to the Model Bills and Regulations. See Attachment 3 for a summary of changes.
 - submitted October 30 and incorporated into 2017 OP.
- VFD language – Create a new Regulation 13. *Committee approved, pending CVM review, to the BOD.*

Regulation 13. Veterinary Feed Directive

- (a) For the purposes of enforcement of Section 10(a)(2) of the Act the ____ adopts the definitions of Title 21, Code of Federal Regulations, 558.3(b).
- (b) For the purposes of enforcement of Section 10(a)(2) of the Act the ____ adopts the requirements of Title 21, Code of Federal Regulations, 558.6.

Citation Format and Style Recommendations

To help maintain consistency between the Model Bills and Regulations.

Statutes

Referencing the entire act: the Federal “xx” Act

Referencing a specific section: Section “x” of the Federal “xx” Act

Regulations

Referencing the entire part: Title 21, Code of Federal Regulations, part 225

Referencing a specific section: Title 21, Code of Federal Regulations, 225.1-225.202

Remaining Recommendations

- Definition of feed needs to be changed in the Non-Commercial Model Bill to harmonize with the updated feed term IDC approved on 9/30/16. *MBRC approved 1/16/17, moves to BOD*
- Consider AAFCO Model Recall Program Plan Review the FDA Guidance Document on preventive controls when it comes out and see if there is a need for a specific AAFCO Recall Plan Guidance Document. Feed and Feed Ingredients Committee?
- Develop a Table in Chapter 5 to reference applicable (topical) FDA Compliance Policy Guides (CPG), Guidance for Industry (GFI) and other related documents. Board of Directors to determine the Working Group.
- Consider reorganizing the animal classes in the Model Regulation. The animal classes are not very well organized, making it difficult to find certain species. It was originally by the amount of feed produced in US.
- Labeling – consider revising the definition to include electronic formats. States are starting to include websites, social media as part of labeling, advertising. AAPFCO added electronic to its labeling definition.

- FSMA GMP Checklist Development - FDA is working on a new checklist. Consider adding a link to the GMP draft guidance in the OP in the meantime.