

Strategic Affairs Committee Report/Minutes

August 5, 2015
10:00 am – 12:00 pm
Denver, Colorado

COMMITTEE RECOMMENDATIONS:

- 1. Report acceptance.

BOARD RECOMMENDATIONS:

- 1. Report accepted – *add date*

ASSOCIATION ACTIONS:

- 1. Report accepted – *add date*

Full Committee Members:

Linda Morrison	Paul Bachman	Ken Bowers	Richard TenEyck
Andy Gray	Roger Hoestenbach	April Hunt	Jamey Johnson
Shannon Jordre	Ali Kashani	Chad Linton	Mark LeBlanc (Board Liaison)
Dragan Momcilovic	Jenny Murphy	Aaron Price	
Nancy Thiex	Judy Thompson	Robert Waltz, Vice Chairperson	

Finance Sub-Committee

Ali Kashani (Chair), Ken Bowers, Jamey Johnson, Mark LeBlanc, Chad Linton, Richard TenEyck, Judy Thompson

By-Laws Sub-Committee

Ken Bowers (Chair), April Hunt

Committee Advisors

Dave Ailor	Nancy Cook	Dave Dzanis	Bob Ehart
Dave Fairfield	Kurt Gallagher	Kristi Krafka	Ed Rod
Richard Sellers			
* Present at meeting			

Committee Report:

- 1. Working Group (Bob/Shannon/Ali/Roger/Ken):
 - o Procedures Manual Review - Committee coordination processes
 - Update/review draft Phase 2 work:
 - Revisions have been made and shared with the Committee immediately prior to the meeting.
 - Action: Committee comments requested back by end of September.
 - Discussion on format/content/placement: Explore opportunity to hyperlink procedures manuals material with the core material in By-Laws, Committee Guidelines, Committee Procedures. Hyperlink can be used but preference is to keep separate document as well.
 - Content discussion: Make sure placement is reviewed between By-Laws and section that follows (April Hunt). Need to obtain ETC training revisions from Tim Lyons for consideration in either OP or Procedures Manual.

- Will require Board approval but not membership. Need to communicate presence of final product on web site home page when posted.

Action: WG will re-review and share final draft with Committee by mid-December for committee consideration at January 2016 Midyear meeting.

2. Sub-Committee activities:

○ By-Laws:

▪ Quorum provisions for Committees suggestion for discussion:

- For a committee meeting to be considered legal in terms of its governance and incorporation status there needs to be quorum. Quorum represents the minimum number of voting committee members who need to be present for a meeting to be convened and decisions to be made. The number defined for quorum will be stated in the organization's bylaws once decided. Generally quorum is considered to be the majority, or half plus one but for some of AAFCO's larger committees (20+) this could prove challenging.
- When quorum is present the chair can call the meeting to order. When quorum is not met a meeting cannot be called to order nor can any decision be made, issues voted on or minutes taken.
- Recommend a formula that identifies a minimum number of voting members (10?) or 50% + 1 whichever is less. In that way, we can ensure that issues are discussed thoroughly but not run the risk of having to cancel meetings which industry and regulatory officials are attending at considerable expense.
- Comments: Quorum is generally 50%+1 (already in electronic voting) and seems prudent. Assess historical attendance at larger committees to determine if 10 is a reasonable number. General opinion favoured a minimum of 10 for larger committees. Quorum includes those in person, by proxy and on the phone. Quorum for formal meetings versus those held outside Annual/Midyear (e.g. conference calls) needs to be clarified (e.g. necessary for formal only). Could distinguish that meeting can be held, but quorum is necessary for voting.

Action: Proposal to be shared with Committee by end of September so it can be integrated into Procedures Manual.

○ Finance:

- Sub-Committee meeting will now precede the SAC in order that their reports can be considered for formal committee action.
- Sub-Committee report for SAC approval (Appendix 1)
Motion to accept report: Richard; second Judy; Motion carries.
- Discussion of on-line OP influence on financial status: Financial health remains strong.

3. Strategic Plan (SP) Priority Activities 2013-16

- Working group (Bob, Jenny, Richard, Linda) report on Integrated Tracking system implementation in FeedBin
 - System demonstrated but no uptake – no update.
- Workplan status reviewed and updates provided for priority activities:
 - Sound financial planning / More cost effective operations: Ali
 - Budget procedure established and actioned.
 - Monthly expenses reviewed and posted in Feedbin (includes sharing with Board). Expect expenses with FSMA to go up.

- Quantitative aspects in order but need to examine qualitative aspects.
 - Revenue Generation Plan: Ali
 - All work products have been actioned and are in place. Activity complete
 - Process for new members: Ali
 - Was on hold due to Committee member changes – new vice Chair CIOC will be working to address outreach activities
 - Build leaders with AAFCO background who support AAFCO: Linda/Tim L.
 - On hold due to other priorities of Committee members.
 - Skills were identified but need to consider how to identify potential leaders.
 - Could wait for IFPTI leadership curriculum/course development but expect it to be a few years away.
 - Association for Executive Leadership (2 day) is being explored for Fertilizer.
 - Next steps include course identification/costing. Could use Administrator’s seminar.
 - Jenny and Tim will seek suggestions and return with recommendations.
 - Emergency Preparedness Exercise: Judy
 - Small table top planning exercise held during Seminar April 2015. Evaluation will be used to improve exercise. Larger exercise in conjunction with 2017 Midyear has been suggested.
 - OP emergency section has been reviewed and updated
 - Folders in feed bin for states to use for table top exercises
 - Update report will be forwarded
 - Partnership establishment: Ali
 - Actively working with key partner FDA (PFP, 50 state, AFSS), NASDA (outreach FSMA), AFDO (regional).
 - Reinvigorated USDA collaboration (conference call investigating partnership).
 - Biggest partner is FDA and work with them will continue to be a priority given PFP, FSMA, etc.
 - Support APHL Grant: Nancy
 - On target with deliverables, monthly reporting to APHL and regular Board reports, annual report completed (posted in the FeedBin/web site)
 - Enhanced Communications (6 sub-elements): Ali
 - Board has been actively working to improve communications (meetings, FeedBin etc).
 - Leader change with new Vice Chair.
 - Need to review/prioritize activities and establish time lines.
 - Ali to update and submit report
 - SP leads have not been submitting workplan updates making transparency a challenge
4. Committee structure review Work Group (WG)(Mark (lead), Judy and Richard)
- WG compiled the results from all Committees. The report was electronically shared with Committee prior to the meeting.
 - Recommendation is not to make changes at this time
5. Strategic Planning 2017+
- FSMA Implementation Task Force (TF) priority activities report reviewed (Appendix 2)
 - Discussed using current Strategic Plan framework, update it, review status of current priorities, integrate FSMA TF priorities and identify limited priorities to manage work load and

expectations from implicated committees.

- Suggestion is to use Committee Chairs and Board for process to identify priorities for 2017-20 Strategic Plan.
- Suggestion to allocate a full day, use the TF facilitator and hold it pre-Seminar – Dave Phillips and Jennifer Roland will investigate location.

Action: Organize planning session pre-Seminar 2016 with Board/Committee Chairs to identify SP priorities for 2017-20.

Confirm Committee financial needs from the 2016-17 budget:

- Travel for Strategic Planning for 2016-17
- Need to consider leadership training costs likely for 2017-18.
- Emergency planning costs expected to come from FFIMC.

Motion: To accept the Strategic Affairs Committee report, subject to minor edits/formatting by Mark; second Bob; Motion passes.

Action Item Table:

Responsible	Item	Action	Timing / Status
Working Group: Bob, Roger, Shannon, Ali and Ken	Phase 2: general review of the Procedures Manual to ensure timely work flow between Committees	Additional revisions were shared with SAC immediately prior to August AGM 2015.	SAC comments requested by end of September. WG will re-review and share final draft by mid-December for committee consideration at January 2016 Midyear meeting.
By-Laws Sub-Committee	By-Laws issues	Quorum provision suggestions discussed.	Proposal to be shared with Committee by end of September so it can be integrated into Procedures Manual.
Finance Sub-Committee	Association financial information	Information was requested on the financial status of the on-line OP.	Ali provided the information at the August 2015 Annual meeting. Complete
Working Group: Bob W. (lead), Jenny and Richard	Strategic Plan and Priority Action Item tracking and progress updates	Strategic Plan key priorities for 2013-16 completed by Board October, 2012. Committee Chairs drafted workplans which were reviewed and accepted by the Board of Directors (with adjustments requested of CIOC (slight re-structure and addition of timelines)). Integrated Tracking system drafted in FeedBin with FASS support for detail input. SAC chair provided feedback. Exploring both FASS and Bin for tracking. No updates received from SP priority leads to update workplans for tracking purposes. WG expect to have a recommendation for the Committee by 2015 August Annual meeting.	No action.
Strategic Affairs: Mark (lead), Judy and Richard	Schedule review of Committee structure two years after implementation to make sure re-organization has been of value.	Proposed workplan presented at August AGM 2014. WG compiled survey the results from all Committees and shared the results prior to the 2015 August Annual meeting.	WG recommended not making changes at this time. Complete.
Strategic Plan 2017-20 (Linda)	Organize planning session pre-Seminar 2016.	Board/Committee Chairs to identify SP priorities for 2017-20. Prepare funding needs for travel.	



Finance Subcommittee Report/Minutes

Wednesday, January 14, 2015

12:00 – 1:30 PM

San Antonio, Texas

COMMITTEE RECOMMENDATIONS:

1. Post Association's Annual Statements in the Feed BIN for Members to view.
2. The current subcommittee structure is working well and members would like the Finance Subcommittee to continue to report to the Strategic Affairs Committee.
3. No need for development of "Dashboard" as this need has been filled by other tools available through FASS.

BOARD RECOMMENDATIONS:

1. Board approved posting of Association's Annual Statements in the Feed BIN for Members to view at their January 15th meeting

ASSOCIATION ACTIONS: Posting completed _____

Committee Participants:

Members present: Richard Ten Eyck, Judy Thompson, Bob Waltz, Mark LeBlanc, Ken Bowers, Jamey Johnson, Doug Lueders and Ali Kashani.

Member absent: Chad Linton.

Committee Report/Minutes:

1. Meeting called to order by Ali Kashani at 12:30 pm CT.
2. Update on investment of AAFCO funds – The sub-committee discussed the investment portfolio and the possibility of moving additional funds from the reserve into the portfolio. It was suggested to inquire with our financial advisor about the possibility and best timing for investing an additional \$100,000.00.
3. Status of "dashboard" development – Very little progress made as it is unclear exactly what information we are looking to illustrate and the required level of detail. With the work being done by FASS, it was determined that the dashboard was no longer required.
4. Committee structure discussion – Discussion of the options for the Finance Committee to report directly to the BoD versus continue as a Sub-Committee under the Strategic Affairs Committee. Members felt that the current subcommittee structure is working well and the Finance Sub-

Committee continue to report through the Strategic Affairs Committee.

5. Discussion of Budget Generating Plan – Discussion of options related to check sample program, meetings, training activities and monographs as potential sources of ongoing/new revenue in additional to the OP.
6. AAFCO budget in general (monthly financial statements, invoices, etc.) –
 - Discussion of Association’s budget and development of documents to track the Association’s financial status and activities were discussed. No required changes to fiscal reports were identified.
 - It was recommended that the chairs should be encouraged to submit plans for their committee activities as funds are available to conduct needed activities. This can be done during chair meetings and by emails when secretary treasurer sends budget generation plans during the month of December.
 - Discussion about transparency with membership, regulated parties and the public regarding AAFCO’s finances. After a thorough discussion, the sub-committee recommended that the Association’s Annual Statements be posted in the Feed BIN for Members to view.
7. Meeting adjourned at 1:30

(This report was voted electronically and accepted by the majority of the members.)

**FSMA Implementation Task Force
Meeting Report: April 27, 2015**

Members Present:

Tim Lyons (ETC) Jim True (ISC) Teresa Grant (LMSC) Jennifer Mirabile (LMSC)
Dave Phillips (FLC) Stan Cook (PFC) Richard TenEyck (IDC)
Eric Nelson, FDA Ali Kashani (ST&CIOCI)
Judy Thompson (FFIMC) Linda Morrison, Chair (SAC)

Absent:

Jenna Areias (FLC) Doug Lueders (MBRC)

Participants (Board):

Ken Bowers, Mark LeBlanc, Dan Danielson, Bob Geiger, Kristen Green

Participants (Other)

Lorraine Garkovich (facilitator) Jennifer Roland (FASS)

The Task Force (TF) met to review the priority activities identified by the group to date (Table 3). The goal was to critically assess each point to determine if AAFCO needs to lead and action it. Table 2 reflects the group's comments and distillation to identify the activities that are need to be taken by AAFCO, for AAFCO members.

Table 1 reflects the final product, which is only the 6 key activities needed for AAFCO members. The TF deliberated linkages between activities, general order and timing of the activities as well as responsible and supporting committees. The TF edited the activities to improve clarity and developed suggested actions that will need to be accomplished.

With the remaining time, the TF selected activities 2, 3 and 6 and further elaborated inputs and outputs as follows:

2. FFIMC – Livestock feed, pet food and feed ingredients to be included to determine the path forward for:

- a. AAFCO GMPS; Develop a plan for states that have adopted AAFCO's model GMPs to make the transition to FSMA GMPs – include MBRC and PFC

Inputs:

FSMA/FSM Regulations
AAFCO GMPs
Identification of states that have adopted AAFCO GMPs
AFRPS
FSMA operations manual (NASDA): Food Safety Program

Outputs:

Develop plan for states to adopt Federal GMPs. Clarify what to do with on farm. Communicate exit

strategy for states with AAFCO GMPs (August 2016)

Remove GMPs and check list from OP (hard copy Nov. 2015; electronic March 2016)

Determine how states can deliver FSMA requirement under Federal or own authority and the ways they will enact. Need an adaptable model for different ways states will implement.

Reference to FSMA in Model Bill; instructions to MBRC (November 2015)

3. FFIMC - To determine the contaminants, hazards, matrix and action levels and enforcement strategies to provide guidance to LMSC to inform method development and priority setting. Integrate collaboratively into current LMSC priorities.

Inputs:

FSMA and lab priorities need to be linked

Identify current lab methods and method development priorities

Effort required needs to be identified (low hanging fruit)

Identify number of labs that could be doing this work and costs to do so (includes worker safety and environmental concerns)

Consider environmental scope

Identify action limits (FDA/CFIA) (consider action limits versus detection limits)

Outputs:

Prioritized list of hazards

Lab methods to be developed

Strategy to use lab resources effectively and efficiently

Detection limits

Recommend min/max detection level of hazard/contaminant

Typical matrices

Levels of concern (species of interest)

Where to find hazards (ingredients of concern, processing steps/conditions)

Incorporate hazards identified by FSPCA into lab detection/quantification processes

Identify lab methods and procedures needed to implement

6. Current Issues and Outreach Committee – Develop an AAFCO communication plan to better inform.

Outputs:

Need to review and revise/confirm AAFCO mission and vision statement

Board work with communications firm to develop a communications plan (reporting template, list of AAFCO members who are liaisons, Committee coordinators, external audience messages, identify spokesperson (internal/external), AAFCO technical support to spokesperson and communications material)

Recommend who will lead communications planning process to Board

Recommend who will lead implementation of communications plan to Board

Next Steps:

Task Force committee representatives with the 6 key activities will begin work in the assigned committee to develop work plans with deliverables, responsibilities and timing.

Taskforce Instruction - General committee work should begin with scoping of what other organizations are already doing in this area. Intelligence gathering is required to capitalize on similar initiatives to minimize AAFCOS work (e.g. EU and IFIF regarding HACCP, NASDA's FSMA Operations Manual when finalized).

It is anticipated that this work will begin immediately and responsible committees will include this during the August meeting. A touch base will be held with Committee Chairs during the Board meeting for communication/information sharing on progress, preceding the August 2015 meeting.

In order to facilitate the oversight process, the use of mind mapping software will be used. The software will help identify deliverables and sort out relative order/priorities. As part of the process, responsibilities and time lines will be determined. The TF were provided with a tutorial and brief overview of <http://www.mindjet.com/mindmanager/>. It can be exported to pdf with the Mindjet viewer. A viewer can be distributed of the mind map that people can click on to expand the topics. Jennifer will take the information from the responsible committees and input it into mind manager for tracking purposes.

**FSMA Implementation Task Force
Meeting Report: April 27, 2015**
FINAL CONDENSED TABLE
AAFCO Specific Priority Activities 2015-17

Item No.	Activity: January 11, 2015	Source	TF Revised Activities: April 27, 2015	Rev. Item No.	Responsible Committee and Deliverable Description: April 27, 2015	Timing
1.1	Confirm that States have proper authorities for inspectors to do the work either for FDA or on their own, i.e., at the State level. Review the Model Bill to identify need for new, revised and missing authorities.	FFIMC Annual 2014	Figure out how the states can deliver FSMA activities for their own purposes (an adaptable model).	1	MBRC – When FSM rules come out in summer of 2015, make recommendations to align Model Bill with needed authorities to implement FSMA.	Fall 2015
1.2 4 5	<p>a. Identify whether we are rewriting AAFCO GMPS or modifying the Model Bill, Model Regs and Pet Food Regs to line up with FSMA Currently, the OP (2015) contains:</p> <ul style="list-style-type: none"> • AAFCO Good Manufacturing Practice Regulations for Feed and Feed Ingredients (211-214); and • Checklist for AAFCO Good Manufacturing Practice Regulations for Feed and Feed Ingredients (215-220) <p>As a first step, we will need to decide whether we are going to maintain these two documents or reference FSMA in the Model Bill/Regulations in the same way as the Federal BSE provisions were included. If we choose to modify the Model Bill/Regulations, we should likely remove both of these documents from the OP at the correct point in time. Pet Food inspection will change as these firms now fall under GMPs and preventive controls so that will have an effect on model bill (4).</p> <p>b. Was looking at the Model Feed Safety Program Plan - August 2007 (240-253). This should also be reviewed and updated in light of the finalized FSMA as required. Might also be useful to identify some additional things to consider with respect to FSMA implementation (5).</p>	FFIMC PFC	<p>a. Develop a plan for States to adopt the Federal GMPS (1.2).</p> <p>b. Review and update Model Feed Safety Program Plan taking FSMA into account (5).</p>	2	<p>FFIMC – Livestock feed, pet food and feed ingredients to be included to determine the path forward for:</p> <p>a. AAFCO GMPS; Develop a plan for states that have adopted AAFCO’s model GMPs to make the transition to FSMA GMPs – include MBRC and PFC</p> <p>b. Model Feed Safety Program Plan – include Linda (OP Section) and Bob Waltz (Feed Safety Coord.)</p>	NOW

Item No.	Activity: January 11, 2015	Source	TF Revised Activities: April 27, 2015	Rev. Item No.	Responsible Committee and Deliverable Description: April 27, 2015	Timing
6	Focus shifting to include more control of contaminants/hazards. Do we have the necessary methods, proficiency and limits of detection/quantification to support the change in regulatory focus?	FFIMC Annual 2014	Use Hazards identified by the FSPCA as a starting point. Develop a prioritized list of hazards for LMSC.	3	FFIMC - include Alliance (FSPCA), Enforcement Issues Committee, ISC, IDC and LMSC - To determine the contaminants, hazards, matrix and action levels and enforcement strategies to provide guidance to LMSC to inform method development and priority setting. Integrate collaboratively into current LMSC priorities	NOW
10.1	(FSPCA, ETC, FFIMC) Expertise in ingredient manufacturing vis-a-vis preventive controls and hazards may be an issue for many sectors (FSPCA, ETC, FFIMC).	FFIMC Annual 2014	Link to regulations item 1.2 and to training.	4	FFIMC & ISC - supported by ETC – To verify if training material for feed ingredient manufacturing from the Alliance meets the needs of Inspectors and revise as needed	Fall 2015 pending Alliance
11	Intelligence gathering is required to capitalize on similar initiatives to minimize AAFCOS work. Should include discussion with EU officials about implementation and IFIF regarding HACCP. Additional resource will be NASDA's FSMA Operations Manual when finalized.	TF mtg. 2015. 01.11	General scoping statement for all committees for when they begin work.		Taskforce Instruction - General committee work should begin with scoping of what other organizations are doing in this area.	Complete – issued with TF report
31	Pet Food inspection will change as these firms now fall under gmps and preventive controls so that will have an effect on AAFCO Feed Inspector's Manual.	PFC	To ISC	5	ISC - supported by LMSC & ETC – Review and revise the Feed Inspector's Manual to make sure it supports the implementation of FSMA (notably aseptic sample)	NOW

Item No.	Activity: January 11, 2015	Source	TF Revised Activities: April 27, 2015	Rev. Item No.	Responsible Committee and Deliverable Description: April 27, 2015	Timing
34	<ol style="list-style-type: none"> 1. Communications strategy to get the word out (e.g. AFRPS). Resources with good outreach that could help are AgLabs and PFP. 2. Need standardized reporting format from member activities related to FSMA. 3. Need list of members working with affiliated organizations on FSMA activities. 4. Need point of coordination gathering information and sharing internally and externally. 	TF mtg. 2015. 01.11	All: Need for better communications /information sharing	6	Current Issues and Outreach Committee- supported by SAC <ol style="list-style-type: none"> a. Develop an AAFCO communication plan to better inform. b. Develop a model communication plan for states to use for outreach to regulated parties. 	NOW

**FSMA Implementation Task Force
Meeting Report: April 27, 2015
First round discussion on initial "Priority Activity 2015-17" list**

Item No.	TF Revised Activities/Actions: April 27, 2105	Activity: January 11, 2015 (TF Report)	Source
Regulations			
1	<ol style="list-style-type: none"> 1. Figure out how the states can deliver FSMA activities for their own purposes (an adaptable model). 2. Develop a plan for States to adopt the Federal GMPS 	(FFIMC, MBRC) <ol style="list-style-type: none"> 1. Confirm that States have proper authorities for inspectors to do the work either for FDA or on their own, i.e., at the State level 2. Identify whether we are rewriting AAFCO GMPS, modifying the Model Bill, Model Regs and Pet Food Regs to line up with FSMA 	FFIMC Annual 2014
2	Part of 1.2 above	Currently, the OP (2015) contains: <ul style="list-style-type: none"> • AAFCO Good Manufacturing Practice Regulations for Feed and Feed Ingredients (211-214); and • Checklist for AAFCO Good Manufacturing Practice Regulations for Feed and Feed Ingredients (215-220) As a first step, we will need to decide whether we are going to maintain these two documents or reference FSMA in the Model Bill/Regulations in the same way as the Federal BSE provisions were included. If we choose to modify the Model Bill/Regulations, we should likely remove both of these documents from the OP at the correct point in time.	FFIMC
3	Strike out	Oregon would like a comparison of The FSMA GMP's to the Model Bill GMP's. What would we have to change to align the Model Bill to subpart B of the rule?	Member
4	Part of 1.2 above	Pet Food inspection will change as these firms now fall under GMPs and preventive controls so that will have an effect on model bill.	PFC
5	Part of 1.2 above: review and update MFSP taking FSMA into account	Was looking at the Model Feed Safety Program Plan - August 2007 (240-253). This should also be reviewed and updated in light of the finalized FSMA as required. Might also be useful to identify some additional things to consider with respect to FSMA implementation.	FFIMC

Laboratories			
6	1. Use Hazards identified by the FSPCA as a starting point. Develop a prioritized list of hazards for LMSC. Collaborate with LMSC to incorporate into their current priority list. 2. Strike out	(LMSC, CSC) 1. Focus shifting to include more control of contaminants/hazards. Do we have the necessary methods, proficiency and limits of detection/quantification to support the change in regulatory focus? 2. Are there opportunities to expand the check sample program to include key hazards/contaminants and different/new ingredient/substrates?	FFIMC Annual 2014
7	Part of 1: normal process	Will the working groups or method needs statements need to change in order to conform to FSMA implementation/regulations/rules/preventative controls? If so, where do we look for guidance?	LMSC
8	Part of 1: normal process	Will FSMA/FDA be looking to this committee for help with tolerance levels?	LMSC
9	Part of 1: normal process	Will any of these methods become mandatory testing for accredited labs?	LMSC
Ingredient Manufacturing			
10	1. Link to regulations item 1.2 and to training. 2. FDA in process of doing	(FSPCA, ETC, FFIMC) 1. Expertise in ingredient manufacturing vis-a-vis preventive controls and hazards may be an issue for many sectors (FSPCA, ETC, FFIMC). 2. Is there a need to identify common hazards in ingredient descriptions (including critical limits) or in some other way (e.g., monographs?) - IDC	FFIMC Annual 2014
11	General scoping statement to all committees when they begin work.	Intelligence gathering is required to capitalize on similar initiatives to minimize AAFCOS work. Should include discussion with EU officials about implementation and IFIF regarding HACCP. Additional resource will be NASDA's FSMA Operations Manual when finalized.	TF mtg. 2015.01.11
	Ingredients		
12	Strike out	Evaluate MOU with FDA and offer changes that facilitates AAFCO's role in establishing common ingredient names for feed labeling	IDC
13	Strike out	Define grocery store waste (and other human food waste streams if appropriate)	IDC
14	Strike out	Foreign outreach of how to get a new ingredient defined	IDC
15	Strike out	Education on intended uses of ingredients	IDC
16	FDA will do	Enhance detail level of definitions where needed to address significant hazards	IDC
	Labelling		
17	Strike out	(IDC, FLC, MBRC) 1. Is additional information required on labels e.g., critical limits for contaminants in ingredients (and mixed feeds?), importer/exporter, 3rd-party inspection program recognition?	FFIMC Annual 2014

Inspection Protocols			
18	1. FDA will do 2. FDA will do 3. FDA will do	(ISC, FFIMC) 1. Develop inspection protocols for facilities we don't currently inspect. 2. Develop inspection protocols/design sampling equipment for contaminants and hazards. 3. Develop inspection protocols focussing on hazard ID and PCs for all facility types.	FFIMC Annual 2014
19	FDA will do	cGMP form for a non-medicated feed manufacturing facility	ISC
20	FDA will do	Identify inspection changes when preventive controls are required for all feed facilities	ISC
21	FDA will do	Will FSMA change when or why we sample	ISC
22	FDA will do	Will contaminant sampling be required as part of FSMA	ISC
23	FDA will provide guidance for the assessment during inspection.	Who will be responsible for assessing PCPs?	ISC
24	FDA will specify inspection protocol and training.	What will the inspector's role be during inspection review of a PCP	ISC
25	Already in process; FDA is leading. Need for better communications/information sharing	Assuming that the FDA will be developing inspection protocols for FSMA. Hopefully FDA might want to involve the States in this process. This might be a project to be managed jointly by the Inspection and Sampling/Feed and Feed Ingredient Manufacturing Committees with input from the FSPCA.	FFIMC
26	Alliance is leading and AAFCO are participating. No further action. Need for better communications/information sharing	The FSPCA is also developing model animal food safety plans for: <ul style="list-style-type: none"> • Dry Food • Liquid Feed • Minerals, Vitamins, Micro Ingredients • Animal Co-products • Plant Co-products • Pet Food • Special Purpose Products We should discuss whether we will need to develop specific inspection protocols for each of these or something generic or a hybrid of the two. There will likely also be some good information about hazards coming out of this exercise that could inform laboratory method development needs for more common hazards, etc. Might also help to identify updates required to ingredient definitions in relation to feed safety concerns and labeling requirements.	FFIMC
27	Per above – FDA are doing. Need for better communications/information sharing	The FSPCA has as a primary responsibility for development of the training curriculum and guidance documents for the feed industry and there will be corresponding needs for FDA and State inspectors as well. Tim Lyons, ETC is on the Sub-group but he and the FDA will likely need SMEs from FFIMC to help with that as well.	FFIMC

28	Alliance developing training for industry; FDA developing training for inspectors. Need for better communications/information sharing.	JTA (Job Task Assessment): This is still ongoing as we are coordinating Subject Matter Experts from different states in conjunction with FDA, IFPTI, UC-Davis and NEHA to thoroughly evaluate what a professional feed inspector does on a daily basis. This JTA will provide these partners to develop trainings to further enhance careers of feed inspectors all the way to managerial positions and leadership.	ETC
29	AAFCO reps already working with Alliance. Includes competency assessment (IFPTI and NEHA). No further action required. Need for better communications/information sharing.	Food Safety Preventative Control Alliance: Working with this group to stay in tune with how this will affect industry and regulators to implement such controls. Evaluate this process in order to educate regulators on how these practices will affect their inspection duties.	ETC
30	Normal business	Sub-committee Workgroups: Develop sub committees to allow committee member to become more involved in the processes that will be coming once all facets of FSMA are implemented.	ETC
31	To ISC	Pet Food inspection will change as these firms now fall under GMPs and preventive controls so that will have an effect on AAFCO Feed Inspector's manual.	PFC
Pet Food			
32	See 6 above	1. Similar issues as livestock feed. Handle together or separate? Biological versus chemical contaminants.	FFIMC Annual 2014
33	1. FDA will do 2. Taskforce function 3. Taskforce function 4. Canada doing in part at this time 5. Per above 6. Statement; no response	Random Thoughts: 1. Training of industry, regulators and inspection staff will be a big need to fill (FSPCA, ETC + SMEs from across AAFCO) 2. Need a documented strategy for the whole thing and funding to get ready. 3. Coordination role - Feed Safety Coordinator or other? 4. North American (Canada/USA) comparability/recognition will be important to both countries. 5. Development of model systems may be helpful to assist inspectors in compliance assessments. 6. Significant impact of AAFCO for years to come!	FFIMC Annual 2014
Outreach			
	All: Need for better communications/information sharing	1. Communications strategy to get the word out (e.g. AFRPS). Resources with good outreach that could help are AgLabs and PFP. 2. Need standardized reporting format from member activities related to FSMA. 3. Need list of members working with affiliated organizations on FSMA activities. 4. Need point of coordination gathering information and sharing internally and externally.	TF mtg: 2015.01.11

**FSMA Implementation Task Force
 Priority Activities 2015-17
 (TF Report January 11, 2015)**

Item No.	Activity	Source
Regulations		
1	(FFIMC, MBRC) 1. Confirm that States have proper authorities for inspectors to do the work either for FDA or on their own, i.e., at the State level 2. Determine whether we are rewriting AAFCO GMPS or modifying the Model Bill, Model Regs and Pet Food Regs to line up with FSMA	FFIMC Annual 2014
2	Currently, the OP (2015) contains: <ul style="list-style-type: none"> • AAFCO Good Manufacturing Practice Regulations for Feed and Feed Ingredients (211-214); and • Checklist for AAFCO Good Manufacturing Practice Regulations for Feed and Feed Ingredients (215-220) As a first step, we will need to decide whether we are going to maintain these two documents or reference FSMA in the Model Bill/Regulations in the same way as the Federal BSE provisions were included. If we choose to modify the Model Bill/Regulations, we should likely remove both of these documents from the OP at the correct point in time.	FFIMC
3	Oregon would like a comparison of The FSMA GMP's to the Model Bill GMP's. What would we have to change to align the Model Bill to subpart B of the rule?	Member
4	Pet Food inspection will change as these firms now fall under GMPs and preventive controls so that will have an effect on model bill.	PFC
5	Was looking at the Model Feed Safety Program Plan - August 2007 (240-253). This should also be reviewed and updated in light of the finalized FSMA as required. Might also be useful to identify some additional things to consider wrt FSMA implementation.	FFIMC
Laboratories		
6	(LMSC, CSC) 1. Focus shifting to include more control of contaminants/hazards. Do we have the necessary methods, proficiency and limits of detection/quantification to support the change in regulatory focus? 2. Are there opportunities to expand the check sample program to include key hazards/contaminants and different/new ingredient/substrates?	FFIMC Annual 2014
7	Will the working groups or method needs statements need to change in order to conform to FSMA implementation/regulations/rules/preventative controls? If so, where do we look for guidance?	LMSC
8	Will FSMA/FDA be looking to this committee for help with tolerance levels?	LMSC
9	Will any of these methods become mandatory testing for accredited labs?	LMSC

Ingredient Manufacturing		
10	(FSPCA, ETC, FFIMC) 1. Expertise in ingredient manufacturing vis-a-vis preventive controls and hazards may be an issue for many sectors (FSPCA, ETC, FFIMC). 2. Is there a need to identify common hazards in ingredient descriptions (including critical limits) or in some other way (e.g., monographs?) - IDC	FFIMC Annual 2014
11	Intelligence gathering is required to capitalize on similar initiatives to minimize AAFCOS work. Should include discussion with EU officials about implementation and IFIF regarding HACCP. Additional resource will be NASDA's FSMA Operations Manual when finalized.	TF mtg. 2015.01.11
Ingredients		
12	Evaluate MOU with FDA and offer changes that facilitates AAFCO's role in establishing common ingredient names for feed labeling	IDC
13	Define grocery store waste (and other human food waste streams if appropriate)	IDC
14	Foreign outreach of how to get a new ingredient defined	IDC
15	Education on intended uses of ingredients	IDC
16	Enhance detail level of definitions where needed to address significant hazards	IDC
Labelling		
17	(IDC, FLC, MBRC) Is additional information required on labels e.g., critical limits for contaminants in ingredients (and mixed feeds?), importer/exporter, 3rd-party inspection program recognition?	FFIMC Annual 2014
Inspection Protocols		
18	(ISC, FFIMC) 1. Development of inspection protocols for facilities which we don't currently inspect. 2. Development of inspection protocols/design sampling equipment for contaminants and hazards. 3. Development of inspection protocols focussing on hazard ID and preventive controls for all facility types.	FFIMC Annual 2014
19	cGMP form for a non-medicated feed manufacturing facility	ISC
20	Identify inspection changes when preventive controls are required for all feed facilities	ISC
21	Will FSMA change when or why we sample	ISC
22	Will contaminant sampling be required as part of FSMA	ISC
23	Who will be responsible for approving PCPs?	ISC
24	What will the inspector's role be during inspection review of a PCP	ISC
25	Assuming that the FDA will be developing inspection protocols for FSMA. Hopefully FDA might want to involve the States in this process. This might be a project to be managed jointly by the Inspection and Sampling/Feed and Feed Ingredient Manufacturing Committees with input from the FSPCA.	FFIMC

26	<p>The FSPCA is also developing model animal food safety plans for:</p> <ul style="list-style-type: none"> • Dry Food • Liquid Feed • Minerals, Vitamins, Micro Ingredients • Animal Co-products • Plant Co-products • Pet Food • Special Purpose Products <p>We should discuss whether we will need to develop specific inspection protocols for each of these or something generic or a hybrid of the two. There will likely also be some good information about hazards coming out of this exercise that could inform laboratory method development needs for more common hazards, etc. Might also help to identify updates required to ingredient definitions in relation to feed safety concerns and labeling requirements.</p>	FFIMC
27	<p>The FSPCA has as a primary responsibility for development of the training curriculum and guidance documents for the feed industry and there will be corresponding needs for FDA and State inspectors as well. Tim Lyons, ETC is on the Sub-group but he and the FDA will likely need SMEs from FFIMC to help with that as well.</p>	FFIMC
28	<p>JTA (Job Task Assessment): This is still ongoing as we are coordinating Subject Matter Experts from different states in conjunction with FDA, IFPTI, UC-Davis and NEHA to thoroughly evaluate what a professional feed inspector does on a daily basis. This JTA will provide these partners to develop trainings to further enhance careers of feed inspectors all the way to managerial positions and leadership.</p>	ETC
29	<p>Food Safety Preventative Control Alliance: Working with this group to stay in tune with how this will affect industry and regulators to implement such controls. Evaluate this process in order to educate regulators on how these practices will affect their inspection duties.</p>	ETC
30	<p>Sub-committee Workgroups: Develop sub committees to allow committee member to become more involved in the processes that will be coming once all facets of FSMA are implemented.</p>	ETC
31	<p>Pet Food inspection will change as these firms now fall under gmps and preventive controls so that will have an effect on:</p> <ol style="list-style-type: none"> 1. AAFCO training manual 2. GMP inspection form <p>Note this will overlap with inspection and sampling.</p>	PFC
Pet Food		
32	<p>Similar issues as livestock feed. Handle together or separate? Biological versus chemical contaminants.</p>	FFIMC Annual 2014

33	<p>Random Thoughts</p> <ol style="list-style-type: none"> 1. Training of industry, regulators and inspection staff will be a big need to fill (FSPCA, ETC + SMEs from across AAFCO) 2. Need a documented strategy for the whole thing and funding to get ready. 3. Coordination role - Feed Safety Coordinator or other? 4. North American (Canada/USA) comparability/recognition will be important to both countries. 5. Development of model systems may be helpful to assist inspectors in compliance assessments. 6. Significant impact of AAFCO for years to come! 	FFIMC Annual 2014
Outreach		
34	<ol style="list-style-type: none"> 5. Communications strategy to get the word out (e.g. AFRPS). Resources with good outreach that could help are AgLabs and PFP. 6. Need standardized reporting format from member activities related to FSMA. 7. Need list of members working with affiliated organizations on FSMA activities. 8. Need point of coordination gathering information and sharing internally and externally. 	TF mtg. 2015.01.11

Reference information:

The Task Force (TF) was formed, with representatives from key Committees, to assess the federal *Food Safety Modernization Act (FSMA)* changes being proposed and to develop an implementation plan for AAFCO affected activities.

The representatives from the key AAFCO Committees are:

Laboratory Methods and Services - Robert Sheridan, Jennifer Mirabile and Teresa Grant
Education and Training - Tim Lyons
Feed and Feed Ingredient Manufacturing - Judy Thompson
Feed Labelling - Jenna Areias
Ingredient Definitions - Richard TenEyck
Inspection and Sampling - Jim True
Model Bill - Doug Lueders
Pet Food - Stan Cook
Current Issues and Outreach - Ali Kashani

The charge for the Task Force is:

Review FDA FSMA and regulations, new CGMP rule and FDAAA to identify the changes and develop a prioritized implementation strategy for activities relevant to AAFCO to:

1. Facilitate and coordinate change within AAFCO.
2. Identify, develop and deliver materials needed by members for implementation.
3. Facilitate policy discussions around new FDA rules. e.g. adopt by reference or rewrite models.
4. Coordinate the implementation process with NASDA.

Time Frame: 2 years