



## **Feed & Feed Ingredient Manufacturing Committee**

2023 AAFCO Midyear Meeting  
January 17, 2023  
San Antonio, TX

**Committee recommendations to Board and membership: NONE**

### **Committee Action Items:**

1. FSMA Implementation Task Force – Working Group 3  
Create action plan to determine the processes of implementing the decision making and method development.
2. 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 1/17/2023**

#### **Committee Participants**

##### **Members Present:**

Charlie Hubenka – NE; (Co-Chair); Ken Bowers – KS (Co-Chair); Ben Jones - TX; Eric Brady – TN; Laura Scott – CFIA; George Ferguson – NC; Dr. Jonathon Roberts – LA; Jessica Gore – NC; Trish Dunn – IN; Jeff Jones – KS; Justin Henson - FDA.

**Via Telephone:** None

##### **Advisors Present:**

Pat Tovey – PFI; Amanda Anderson – PFI; Louise Calderwood – AFIA; Charles Starkey - NARA; Matt Frederking – NGFA; Linda Morrison – LIFE; James Emerson – US Poultry Association; Dan Frank – AFIA; Kathy Alinovi – NGPMA; Emily Helmes – Biom; Bill Bookout – APPA; Chad Witmer – PA; Linda Morrison – Life.

#### **Committee Report/Minutes**

Ken Bowers called the meeting to order 2:20 pm. Members and advisors in the room introduced themselves.

#### **Introductions and Agenda Review, Ken Bowers, and Charles Hubenka**

**NEW MEMBERS: Bill Bookout, Charles Starkey, Chad Witmer.**

#### **Review of Action Items**

##### **Mineral Guidelines Working Group – Therrell**

This was finalized and 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*

Sharon Webb Co Chair Lab services committee – Reported on the survey. 29 responses. “Top 10” Results were presented and can be found on the Bin. Full results to be presented at 2023 Annual meeting in Baltimore. Regulatory should still work with lab to prioritize methods.

Brady – This will be an annual survey. Form will be on the new website. Will be able to receive results in a timely manner. Not a lot of change with the survey results.

### **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*

Brady - 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. Will continue using tool moving forward. Skillsets are being built. CO will host the 2023 AITS in June.

### **Canadian Food Inspection Agency Update - Laura Scott**

- The CFIA is continuing to work towards final publication of updated Canadian Feeds Regulations, with a target of Summer 2023.
- When the updated regulations are published some of the changes will come into effect right away, while others will be delayed.
- Changes respecting labelling, standards and product registration will come into effect immediately, but will have a one-year transition period that will allow regulated parties to follow either the old rules or the new ones.
- New requirements with respect to hazard analysis and preventive control plans will come into effect one year after publication of the regulations.
- New requirements with respect to licences will come into effect 18 months after publication of the regulations.
- The CFIA is preparing guidance and planning outreach activities to help support regulated parties with the updated regulations.
- The CFIA has also been working on a number of other activities
  - o The MyCFIA application portal has been fully launched. Applications for feed registration and approval can now be made on-line. Companies are encouraged to submit their applications here.
  - o A database of registered products is in development and will be available on the web
  - o Updated guidance on acid-based products and new guidance on data flexibility are



available on the CFIA website.

### **Industry updates –**

Pat Tovey PFI, -

- Hosted PFI's annual meeting in December. Well attended, met their goals. Next year's meeting will be December 3-5.
- IPPE - Will be hosting training along with sister associations, aiming to assist farms to generate USDA/APHIS inspection packages for trade.
- PFI planning to provide comments at FDA public information hearing regarding Ingredient Definition Process.

Louise Calderwood AFIA

- Hearing from feed and feed ingredient manufacturers of need for 7-year discretionary period for Pet Food Label Modernization.
- Appreciate input received from states from survey. States are in good shape financially, but legislators tend to steer fees collected from industry to uses other than for regulation. Understand that it is not necessarily the regulators doing this, and appreciate that, but want to reiterate that it is frustrating for industry to pay fees that go elsewhere and not to regulation purposes.
- PFAS – states are all over the board or regulating these in packaging.
- Working closely on sustainability messaging. Making sure their industry members have valid tools to measure their sustainability.
- PCQI course offered in July in Nashville, TN. Check website for more.

### **Other Business:**

#### **Nutrient Contaminant Workgroup**

Committee needs to decide whether to continue with this workgroup. Austin has all the documents that were developed if we want to continue. Charlie and Ken will look at the charge and decide direction.

The board in 2021 charged FFIM to put together some model contaminants and hazards so this workgroup was formed. Workgroup met 3 or 4 times and started with nutrients that if used at an excess of normal use level could be considered hazardous. They identified some nutrients that were tied to recalls. That's as far as the workgroup has gotten.

Tovey - Concerned that too much effort would be going into something that is already out there or taking place of contacting state veterinarian/toxicologist. Is there merit to going forward with this workgroup? Industry seemed to not see the value.

Therrell – A focus around the workgroup was they didn't want to re-invent the wheel. There is a lot of toxicology information out there. Wanted to try and get this information in one spot for convenience. Committee needs to decide whether to continue.

Alinovi – Concerns regarding possible contaminants in organ meats in fresh food diets. Would like the workgroup to continue.

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

VSIP working group tasked with review of National Medicated Feed Program section pg. 258 - 263 of the 2023 OP and remove references to the VSIP. VSIP was removed from the OP. Hubenka to lead workgroup.



Workgroup  
 Charles Hubenka  
 Ben Jones  
 Eric Brady  
 Jonathon Roberts  
 Dave Fairfield

**NEW BUSINESS-**

**Edits in OP to Official Guidelines for Contaminants Levels Permitted in Mineral Feed Ingredients.**

Jennifer Kormos. Formed a work group to go over document to edit for clarity, not change content. Trish Dunn IN, Charlotte Conway CVM, KC Gutenberger CDFA.

**Definitions differences** – Complete feed, total diet, concerns with Chapter 5 Table 3. Louise Calderwood. Table 3 is suggested guidelines for contaminants. Understanding there is flexibility in the definition of complete feeds they withdraw any request for change to tables. No working group requested. Would like to continue thinking about possibly revisiting in the future, as definitions (finished feed, complete feed, total diet, etc.) are developed.

**Strategic Plan assignment for 2023 – 2025.** Discussion/workgroups. Linda Morrison

3.1 Chairs from FFIMC, ISC, and EC will go through and identify the road map to promote an integrated food safety system. Once tasks are figured out Committee chairs will bring back assignments for workgroups.

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing / Status</b>
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 Lab 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: August 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 who perform feed ingredient manufacturing inspections	Update: August 2023

**Meeting Adjourned.**