Animal Feed and Food Safety

Tim Herrman, Ph.D.
Professor and Director
Differing Missions Impact State and Federal Agencies Approach to Compliance

Consumer Protection

Vs

Maintaining a Level Playing field
OFFICE OF THE TEXAS STATE CHEMIST

Protecting consumers and enhancing agribusiness through its feed and fertilizer regulatory compliance program, surveillance and monitoring of animal-human health and environmental hazards, and preparedness planning.

Office of the Texas State Chemist

FDA Recall Notices & Alerts

<table>
<thead>
<tr>
<th>Date</th>
<th>Product Type</th>
<th>Short Description</th>
</tr>
</thead>
</table>

What's new
- Nov 2009 Newsletter
- Feed Industry HACCP Website
- New BSE Regulation & Carcass Disposal Res.
- Testing on Private Samples (04-06-09)
- Chemical Facility Act and Appendix A
Generic components of risk analysis

Risk Communication

Risk Assessment
Scientific inputs

Risk Management
Decisions involving Policy and values

Source: FAO - Food Safety Risk Analysis
Animal Feed Safety System and Risk

FDA is developing an Animal Feed Safety System (AFSS) that minimizes the risk to animal and public health through the use of risk-based, preventive, and comprehensive animal feed control measures.

http://www.fda.gov/cvm/AFSS.htm
OTSC Regulatory Program

- Science based annual work plan
- Science based sample analysis schedule
- Serve as risk managers
- Includes monitoring of human-animal hazards
  - Mycotoxins
  - Microbiological contaminants
  - Heavy metals
  - BSE contract and grant w/FDA

Ben Jones
## OTSC Risk Management Approach

<table>
<thead>
<tr>
<th>Cluster</th>
<th>No. of obs.</th>
<th>Dif. Low Var (%)</th>
<th>Non-Vio Rate (%)</th>
<th>Pert. Rank (%)</th>
<th>Sampling rate (%)</th>
<th>Manufact uring practice</th>
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<tbody>
<tr>
<td>1</td>
<td>812</td>
<td>65.6 ±16.0</td>
<td>99.9 ±1.2</td>
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<td>0.11 ±1.9</td>
<td>5.0 ±3.8</td>
<td>100.0</td>
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<tr>
<td><strong>Total</strong></td>
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<td><strong>36.1 ±47.9</strong></td>
<td><strong>90.4 ±25.9</strong></td>
<td><strong>51.3 ±26.6</strong></td>
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</table>

*a Dif. Low Var, difference of low variance (%); Non-Vio Rate, non-violation rate (%); Pert. Rank, percent rank (%).*
OTSC COMPLIANCE STRATEGY

- Reduce Violation
- Consider Factors For Enforcement Tool Selections
- Use Appropriate Enforcement Tools
- Seek Voluntary Compliance
- Apply Risk-Based Work Planning and Assignments
- Improve Communication and Response
- Improve Compliance
Corrective Actions Taken By a Firms as an Indicator of Compliance

- Licensing
- Product Registration
- All Products Must Be Labeled
- Samples Outside Three AVs of the Label Guarantee
- Samples Containing Aflatoxin or Fumonsin
- Firm Inspections Finding Violation with BSE Regs
- *Salmonellosis* Traced to a Product
- Consumer Complaints
FDA Proposed New Authorities and Potential Unintended Consequences

- Require Food Facilities to Renew Their FDA Registrations Every Two Years, and Allow FDA to Modify the Registration Categories
- Require New Food and Animal Feed Export Certification Fee to Improve the Ability of U.S. Firms to Export Their Products
- Authorize FDA to Accredit Highly Qualified Third Parties for Food Inspections
- Empower FDA to Issue a Mandatory Recall of Food Products When Voluntary Recalls Are Not Effective
- Provide FDA Enhanced Access to Food Records During Emergencies
- New data sharing a collaboration with states
  
  Food Protection Plan
  An integrated strategy for protecting the nation’s food supply
Regulations Impact on the Market

- Association of American Feed Control Official Model Bill
- FDA pursuit of self-affirmed GRAS versus letters of no-objection
- Feed Industry HACCP
  - Required in the EU
  - Voluntary in the US
- Role of Feed Associations
AAFCO Model Bill

Model Bill and Regulations

Officially Adopted by
Association of American Feed Control Officials
And Endorsed by
American Feed Industry Association
National Grain and Feed Association
Pet Food Institute
GRAS and Letter of No Objection

- GRAS before 1958 that FDA has generally recognized as safe
- FDA is in the process of developing a self-affirmed GRAS guidance
- The self-affirmed GRAS will replace the current practice of issuing a letter of no objection. During the Atlanta Feed Regulators Meeting hosted by IFIF in 2010, Dan McChesney from FDA-CVM acknowledged that Letters of No Objection can distort trade.
Hazard Analysis and Critical Control Point

Europe Feed Hygiene Regulation

Hazard analysis and critical control points (HACCP) system

1. Feed business operators carrying out operations other than those referred to in Article 5(1) shall put in place, implement and maintain, a permanent written procedure or procedures based on the HACCP principles.
HACCP Schemes and Commercial Auditing Services

- ANAC – CFIA
- FAMI QS
- GMP+ International
- Global Gap
- Facility Certification System – HACCP Certification Program
Verification Program for a Voluntary HACCP Plan

- Provides clarification on how to apply HACCP principles when manufacturing feed. This represents the first such document in the global feed industry and can be applied to the multitude of HACCP schemes and certification systems developed by feed trade associations in the US, Canada, and Europe. The program also provides the basis upon which competent authorities can provide third party audits “upon request” by firms that do not subscribe to commercial auditing services.
Welcome to HACCP Program

Texas A&M University, University of Nebraska-Lincoln and Kansas State University faculty and staff are collaborating with the feed industry leaders to develop and implement a voluntary HACCP Program. Hazard Analysis Critical Control Points (HACCP) is a food safety management tool that focuses on preventing biological, chemical, and physical hazards from reaching the consumer of the final product.

Why Implement a HACCP Program?

- Improves food/feed safety so that it meets or exceeds the industry standards
- Prevents hazards from occurring in food & feed products
- It is a proactive rather than a reactive approach
- Makes excellent business sense

Upcoming Events

HACCP Training:
Feed Industry HACCP Executive Briefing
Feed Industry HACCP Auditor Manual