



# OTSC Quarterly Newsletter



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## OTSC Withdraws Feed Industry Memorandum 3-18

OTSC will no longer allow the use of chlortetracycline in commercial white-tailed deer rations for growth promotion and feed efficiency. It is believed the antimicrobials were also used to control bacterial pneumonia or treat bacterial enteritis. In August 2008, Feed Industry Memorandum 3-18 was written to clarify the OTSC policy regarding the use of chlortetracycline in white-tailed deer. The policy states the use “for increased rate of weight gain and improved feed efficiency.”

<http://otscweb.tamu.edu/Laws/PDF/Feed/FdInd-3-18-rev-08-08-08.pdf>

Antimicrobial drug use in both humans and animals can contribute to development of antimicrobial resistance. Therefore, the U.S. Food and Drug Administration (FDA) announced in December 2013 the implementation of a plan to help phase out the use of medically important antimicrobials in food animals for production purposes with claims to enhance growth or improve feed efficiency. The plan includes a voluntary removal of the growth promotion claims by animal pharmaceutical companies of the FDA-approved use conditions found on the label of these products. In addition, any remaining therapeutic uses on the label to treat, control, or prevent disease in animals will require veterinary oversight.

To help phase in veterinary oversight, the FDA has issued a proposed rule to update the existing regulations related to the Veterinary Feed Directive (VFD). The use of VFD drugs will require specific authorization by a licensed veterinarian with a valid veterinarian-client-patient relationship.

The OTSC will align existing policy (i.e. Feed



Industry Memorandum 3-18) with the new regulations by withdrawing the memorandum on September 1, 2015, effectively eliminating the use of chlortetracycline in deer feeds without a valid VFD. The following links provide additional information:

VFD Description:

[http://www.fda.gov/AnimalVeterinary/ResourcesforYou/ucm268129.htm#Veterinary\\_Feed\\_Directives](http://www.fda.gov/AnimalVeterinary/ResourcesforYou/ucm268129.htm#Veterinary_Feed_Directives)

VFD Proposed Rule:

<http://www.gpo.gov/fdsys/pkg/FR-2013-12-12/pdf/2013-29696.pdf>

Compliance Policy Guide 615.115

<http://www.fda.gov/ICECI/ComplianceManuals/CompliancePolicyGuidanceManual/ucm074659.htm>

AMDUCA:

<http://www.fda.gov/animalveterinary/guidancecomplianceenforcement/actsrulesregulations/ucm085377.htm>

Questions related to the matter can be directed to:  
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## OTSC Breaks Ground on Building Expansion - By Blair Fannin

COLLEGE STATION - The Office of the Texas State Chemist, part of Texas A&M AgriLife Research, is expanding its headquarters at Texas A&M University in College Station, adding more than 10,000 square-feet of laboratory testing facilities as well as an underground containment system, according to officials. A groundbreaking ceremony was held recently that included members of its Advisory Board Committee and Dr. Craig Nessler, Director of AgriLife Research. The Texas A&M headquarters is located at 445 Agronomy Road in College Station.



Dr. Tim Herrman, State Chemist, and Dr. Craig Nessler, Texas A&M AgriLife Research Director, are joined by Advisory Committee members at a groundbreaking ceremony recently at the headquarters of the Office of Texas State Chemist. The facility will be expanding by 10,000 square feet, adding additional laboratory and testing facilities.

“This expansion will broaden our ability to protect the feed and fertilizer that supplies our livestock and crop industry here in Texas, and expand work involving new hazards that are defined within the Food and Drug Administration’s Food Safety Modernization Act,” said Dr. Tim Herrman, State Chemist. The expansion will bring the facility “up to full capacity.”

“When we moved from our old location on the main campus of Texas A&M, our new facility was designed with future expansion in mind. With this addition of 10,000 square feet, our entire headquarters will encompass 30,000 square feet. This will make our facility one of the most state-of-the-art facilities of its kind. The expanded capabilities will enable the office to address an ever evolving market place and new or emerging risks. It also positions the agency to better compete for grants that fund research that helps protect consumers and enhances the competitiveness of Texas feed and fertilizer industry,” he said.

“Klunkert Construction Inc. of Bryan is the contractor,” Herrman said, noting the expansion will take place on the west side of the headquarters building. Members of the advisory committee are Mark Hebert, Chairman, Simplot Grower Solutions; Scott Piercy, Vice Chairman, Poole Chemical Co.; Daniel Berglund, Texas Corn Producers Board; Sid Brough, EdCot Coop Gin; Mike Compton, Texas Farm



## Continued: Ground Breaking

Products ; Jimmy Fehner, Fehner & Son Grain Co.; John Fritts, Gorman Milling Co. Inc.; Justin Gough, El Dorado Chemical; A.J. Kresta, Texas Sorghum Producers; Horace Luensmann, Producers Cooperative Marketing Association; Bill Messer, Austin; Paul Mostyn, Westway Feed Products; A.J. Rath, Maxim Production Company; Bob Reed, Texas Farm Bureau; David Volleman, Texas Association of Dairymen; Ben Weinheimer, Texas Cattle Feeders Association.



OTSC staff present at the groundbreaking of the OTSC building expansion.



Future expansion to the OTSC building.

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*Protects consumers & enhances Agri-Business through its Feed & Fertilizer Regulatory Compliance Program, surveillance & monitoring of Animal-Human health & environmental hazards, & preparedness planning.*

## Hazard Analysis and Preventive Controls for Food for Animals

Implementation of hazard analysis and preventative controls by food establishments, including feed manufacturers, is required by the 2011 Food Safety Modernization Act (FSMA). Adoption of hazard analysis and critical control point (HACCP) principles are mandated within FSMA including the need to perform a hazard analysis, establish preventative controls, corrective actions, verification and recordkeeping, and develop a written plan to prevent feed and food safety hazards. Adoption of a HACCP system also helps companies retain their competitiveness in a global market.

To help the feed industry implement the Food Safety Modernization Act hazard analysis and preventative controls for food for animals, Texas A&M University offers HACCP training via distance and face-to-face workshops. The training incorporates science based performance standards and compliance strategies to assist HACCP teams develop a plan to comply with US feed safety regulations.

Past program participants include individuals from 21 countries, FDA's Animal Feed Safety System team, feed control officials from 9 states, university faculty and graduate students, and industry personnel from

companies that manufacture over 50% of US feed supply. The course material was used during the development of the Association of American Feed Control Official (AAFCO) Verification Program for a Voluntary HACCP Plan, hazard guide and auditing checklist for the AFIA Safe Feed Safe Food Program, the Facility Certification Institute's Feed HACCP Certification program, and FAO's Animal Production and Health manual 9 titled *Good Practices for the Feed Industry*.

The development of the training material was funded, in part, by the United States Department of Agriculture's Food Safety Initiative in 2002 and involved a team of faculty from Kansas State University, the University of Nebraska, and Texas A&M University. All three university partners continue to extend this HACCP training to feed and pet food manufacturers. To ensure that the program addresses the latest scientific developments and regulatory requirements, a website (<http://www.feedhaccp.org/>) is continuously updated.

The next online course offering begins June 8 and lasts 10 weeks. The next face-to-face training is targeted for San Angelo, TX, this fall.

## OTSC Fertilizer Mixer Evaluation

Feed and fertilizer manufacturers pay close attention to each stage of the production process to prevent defects and maintain quality. Regulators may review Quality Assurance (QA) records but agencies aren't typically involved in industry's day-to-day QA activities.

The feed and fertilizer industry has been afforded two unique opportunities to partner with OTSC on QA projects. The first opportunity arose in 2013 as part of a cooperative agreement that funded feed mixer performance testing as a service to the Texas feed industry. Under this agreement 264 feed mixers have been validated in preparation for the Food Safety Modernization Act (FSMA) Preventive Controls for Animal Food re-

quirements. More recently, industry requested assistance from the Office to validate fertilizer mixers in a similar manner.

OTSC is working with industry to develop the mixer performance testing methodology and will develop recommendations to optimize mixer performance. The OTSC advisory committee members attending the spring meeting visited EDC Company in Bryan for a fertilizer mixer demonstration and discussion of the project.

A limited number of fertilizer mixers will be evaluated as part of the 2015 Texas Feed and Fertilizer Control Service plan of work. Feed mixer evaluations are available upon request.