Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals

The Food Safety Modernization Act (FSMA) and accompanying rules include new regulations for animal feed. The Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals were published in September of 2015. As the rule title states, it combines current good manufacturing practices patterned after food facilities with hazard analysis and critical control points (HACCP) principles currently required for meat and poultry, fish and seafood, and juice. Many in the feed industry have been preparing for this new regulation by taking training on HACCP for feed as part of the United States Department of Agriculture Food Safety Initiative (www.feedhaccp.org) involving faculty from Texas A&M University, Kansas State University, and the University of Nebraska. While the 2015 FSMA rule pertaining to food for animals requires training material must conform to a curriculum approved by the Food and Drug Administration and developed by the Illinois Institute of Technology’s Institute for Food Safety and Health, neither have been accomplished to date. An effort to prepare regulatory officials to perform inspections is underway through a collaborative effort between FDA and the Association of American Feed Control Officials. Their target completion date is 2019.

To fill this gap, Texas A&M University in collaboration with the Office of the Texas State Chemist (OTSC) continues to provide HACCP training for the Texas, United States and global feed industry through a distance online format and face-to-face training that incorporate FSMA rules.

OTSC received funding from FDA to help prepare the industry adopt these new regulations by examining the likelihood and severity of various chemical and biological hazards in feed ingredients and finished feed during the period of 2010-2015. Among these ingredients were distillers dried grains and solubles (DDGS), a co-product of the fuel ethanol production industry. In their conclusion, the Texas A&M authors state, “this study characterizes DG co-products collected in Texas and provides a comprehensive evaluation of biological and chemical hazards posed by this important feed ingredient that should augment feed manufacturers conducting a hazard analysis required by the current FDA rules of animal food. In most cases, these hazards do not require risk-based preventive controls based on their likelihood and severity.” OTSC will continue to monitor and publish scientific data to support feed company’s hazard analysis and risk based preventive control program, captured in their food safety plan.

FSMA and new rules include the requirement for companies to establish a recall plan and create a verified supplier approval program to oversee risk-based preventive controls managed by suppliers. Through a separate grant from FDA, OTSC developed a guidance document and template for managing food recalls in Texas, Latin America and the Caribbean (http://recall.tamu.edu/). OTSC will be working with their advisory committee and stakeholders to develop solutions to meet these and other provisions within the FSMA rules in addition to the HACCP training. As an outcome of this effort, we will help streamline rule implementation and ensure effective hazard analysis and risk-based preventative controls are implemented to ensure food safety and feed industry competitiveness.
Protects consumers & enhances Agri-Business through its Feed & Fertilizer Regulatory Compliance Program, surveillance & monitoring of Animal-Human health & environmental hazards, & preparedness planning.

OTSC Bids Farewell to Dr. James Balthrop Jr.

After 25 years of service with the Office of the Texas State Chemist, including 10 years as the Quality Assurance Manager, Dr. Jim Balthrop retired effective February 5, 2016.

Dr. Balthrop earned a Ph.D. in Biochemistry from Texas A&M and then moved to Charleston, SC to work as a research chemist with the National Fisheries Service for 9 years. In 1990, he returned to College Station and joined OTSC as Laboratory Supervisor in the Agricultural Analytical Services department. In 2005, he was promoted to Quality Assurance (QA) Manager. Among his accomplishments as QA manager include leading the laboratory to achieve ISO 17025 accreditation and co-authoring a Quality Assurance manual for Feed Analysis sponsored by the Food and Agriculture Organization of the United Nations.

Dr. Balthrop’s retirement plans include devoting more time to organizations such as the Texas Master Naturalist program, Texas Parks & Wildlife Dept.’s Angler Educator program, Brazos Valley Museum of Natural History, Rio Brazos Audubon, Texas River Protection Association, and for fun, the Brazos Valley Fly Fishers. Most of all, he looks forward to spending more time with his charming wife, Susan. Dr. Balthrop has been an invaluable member of the OTSC team and will be missed greatly.

CSB Releases Final Report on West

The U.S. Chemical Safety and Hazard Investigation Board (CSB) released its final report titled West Fertilizer Company Fire and Explosion Investigation Report, on Thursday, January 28, 2016.

The Office of the Texas State Chemist (OTSC) continues to perform at least annual inspections to verify fertilizer facilities that store ammonium nitrate are in compliance with the Texas Commercial Fertilizer Control Act and Texas Commercial Fertilizer Rules. In addition to the OTSC inspection, new legislation allows:

1) A fire marshal to enter the facility storing ammonium nitrate to make a thorough examination of the facility; and
2) The local fire department access to the facility to perform a pre-fire planning assessment.

(Read the complete final report at: http://www.csb.gov/west-fertilizer-explosion-and-fire/)

OTSC Advisory Committee Meeting

The Spring Advisory Committee will occur May 18, 2016 at the Office of the Texas State Chemist building in College Station. The agenda includes: fertilizer labeling, fertilizer mixer testing, incorporation of fumonisin into the One Sample Strategy program, mycotoxin test kit validation, and updates involving the FDA’s Veterinary Feed Directive and Food Safety Modernization Act rules. The meeting will also include a building dedication ceremony. The current Chair and Vice-Chair of the committee are:

Scott Piercy and Ben Weinheimer

Other committee members include:

Daniel Berglund, Josh Birdwell, Sid Brough, Mike Compton, Suzy Davis, Jimmy Fehner, John Fritts, Justin Gough, Horace Luensmann, Bill Messer, Paul Mostyn, Jake Pieniazek, Bob Reed, David Volleman

Information on the advisory committee is posted on the OTSC website at: http://otscweb.tamu.edu