OTSC Quarterly Newsletter

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OTSC's Implementation of the Feed Standards Update

In September 2015, the Office of the Texas State Chemist (OTSC) initiated implementation of the Animal Feed Regulatory Program Standards (referred to as the feed standards) under a cooperative grant program funded by the FDA to help to "ensure a uniform and consistent approach to feed regulation among jurisdictions" (FDA 2017). This program is designed to advance efforts for a nationally integrated feed safety system by assisting State feed regulatory programs to achieve and maintain full implementation of the feed standards.

The agreement also provides funding for the laboratory to pursue accreditation under the international standard ISO/IEC 17025:2005. Recently, OTSC successfully completed our Year 2 Assessment under the agreement. Over the past two years, OTSC has made significant progress improving the internal and external processes by:

- Revising SOPs;
- Ranking risk;
- Developing an outreach plan; and
- Updating the investigator training plan.

Currently, OTSC is in the process of implementing a Regulatory Information/Document Management System that will allow the agency to update and manage regulatory data on a real time basis to facilitate the monitoring, measurement, and assessment of enforcement and compliance activities. The adoption of these standards is part of the OTSC continuous improvement program and fulfills the agency's mission for protecting the consumers of feed and fertilizer and enhancing agribusiness in Texas.

OTSC Fertilizer Industry Memoranda 5-10 & 5-11 in Effect

Recently, the following two Fertilizer Industry Memoranda (FIM) went into effect:

1. FIM No. 5-10 — Grade Statement Policy (Effective June 1, 2017)
2. FIM No. 5-11 — Fertilizer Mixtures that Contain Nutrient Stabilizer Additives (Effective August 1, 2017)

The Grade Statement Policy requires the use of the Texas Commercial Fertilizer Control Act definition §63.001 for grade (definition 9), will be in harmony with the official standards of the Association of American Plant Food Control Officials (AAPFCO) found in §63.004 (Rules); shall be stated in whole numbers in order of nitrogen, available phosphate, and soluble potash found in §63.021 (grade statement) and the grade will be listed on the label (§63.051). This policy re-enforces OTSC commitment to the AAPFCO Statement of Uniform Interpretation and Policy and will provide consistency and facilitate commerce among states.

The Nutrient Stabilizer Additives Policy clarifies the responsibility of firms to register and label products containing nutrient stabilizer additives and the requirement that each nutrient stabilizer additive have a currently accepted laboratory method of analysis. Both policies were reviewed by the OTSC Advisory Committee and can be viewed on the OTSC website. (http://otscweb.tamu.edu/Laws/Policy.aspx)

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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.

OTSC's Agricultural Analytical Services Expands Accreditation

Implementing a quality management system is a means of ensuring efficiency and technical competency in testing laboratories. An ISO/IEC 17025 accreditation certificate shows customers that your laboratory values quality and has demonstrated to an independent third party that it possesses the technical competence to provide reliable and accurate test results.

In October 2013, the OTSC Agricultural Analytical Services (AAS), achieved accreditation to the ISO/IEC 17025:2005 standard through Perry Johnson Laboratory Accreditation, Inc. In November 2015, AAS changed providers and achieved accreditation for aflatoxin and fumonisin testing through the American Association for Laboratory Accreditation (A2LA), certificate number 3915.01. The lab recently expanded its scope of accreditation to ISO/IEC 17025:2005 to include additional test methods for nutrient minerals, contaminant metals, protein, and a poison screen using gas chromatography mass spectroscopy.

At the same time, the OTSC laboratory achieved accreditation under two additional standards, ISO 17034:2016 ,"General requirements for the competence of reference material producers" (certificate number 3915.02), and ISO/IEC 17043:2010, "Conformity Assessment - General requirements for proficiency testing" (certificate number 3915.03). Production of reference material for aflatoxin and fumonisin provides a reliable source of naturally contaminated corn at a variety of levels.

The reference material is used in-house for AAS working controls, in the OTSC One Sample Strategy program for facility control samples, and in the production of test material used for the proficiency test (PT) programs launched by OTSC. The use of these reference materials in PT and co-regulation programs worldwide has facilitated the spread of Texas exceptionalism by helping the global feed industry manage aflatoxin risk.

OTSC's expansion of the AAS's ISO accreditation to encompass other methods is crucial to facilitating regulatory compliance within the Texas feed industry, through the production of sound and defensible results. These quality results are the key to assisting the Texas industry in achieving compliance with regulatory standards, gaining consumer confidence and maintaining competitiveness in both domestic and global markets.