



OTSC Quarterly Newsletter



Volume 27, No. 2

Office of the Texas State Chemist

May 2020

Essential Services and Critical Infrastructure

President Donald Trump, on March 16th, issued updated Coronavirus Guidance for America. The guidance stated: “If you work in a critical infrastructure industry, as defined by the Department of Homeland Security, such as healthcare services and pharmaceutical and food supply, you have a special responsibility to maintain your normal work schedule.” The Department of Homeland Security (DHS) Cyber Security & Infrastructure Security Agent (CISA) identified 55 critical functions for security and public safety deemed “essential services.” The critical functions include 1) produce and provide agricultural products and services, and 2) produce & provide human and animal food products and services.

The Office of the Texas State Chemist (OTSC) received calls from the Texas feed and fertilizer industries as early as March 16 questioning whether their personnel and services were essential. The OTSC developed and posted on the OTSC website an “Essential Services and Critical Infrastructure – Agricultural Inputs, Outputs, and Services” letter, deeming the Texas feed and fertilizer industries as essential. The letter can be found at: <http://otscweb.tamu.edu/brochure/OTSCCOVID19Response-March-19-2020-March-25-2020.pdf>

“OTSC made the necessary adjustments to continue to provide full service to the feed and fertilizer industry and protect consumers during this crisis.”

OTSC Continuity Plan Incorporates CDC Guidance

The governor’s office directed all state agencies to review and update their continuity plan during a call on March 13, 2020. OTSC provides an essential service to the Texas feed and fertilizer industry which are part of the nation’s critical infrastructure. The updated continuity plan outlined the activities and staffing by which OTSC would continue to fulfill its mission to protect consumers and enhance agribusiness.

In Stage I, the office maintained effectiveness through on-site personnel and remote operations while Investigators stood ready to investigate complaints filed by consumers and industry during their online training. In addition, Investigators began to inspect websites and social media. By targeting products that are often sold exclusively online, FFCS addressed regulatory fairness concerns voiced by industry and widened the scope of consumer protection. A variety of products and issues that are rarely encountered during inspections at feed and fertilizer manufacturers, warehouses and retailers have been identified. Examples include the absence of basic label information (i.e., nutrient guarantees, name and principle address, purpose state-

ment and ingredient statement) and the presence of unapproved ingredients and drug claims. As a consequence, higher industry violation rates are likely to be reported during 2020.

Stage II was implemented following the Spring Advisory Committee meeting, which was held April 16, 2020 via teleconference. During the call, members agreed that on-site sampling at manufacturing facilities could be conducted safely if additional measures are taken to reduce points of contact. For example, FFCS field staff attempt to provide advance notice of inspection by calling ahead to inquire about safety protocols; conduct work in open areas and observe social distancing guidelines; collect and submit sample documentation electronically; wear personal protective equipment; and follow sanitary precautions. Office personnel observe similar recommendations to prevent exposure and transmission of the novel corona virus.

As we look toward the challenge of reopening Texas, the Office has waived the late fee penalty for the February 29, 2020 period and will continue to incorporate sensible practices while protecting consumers, industry, and OTSC personnel.

Office of the Texas State Chemist

Mailing Address:

P. O. Box 3160
College Station, TX 77841

Physical Address:

445 Agronomy Road
College Station, TX 77843

Phone: 979-845-1121

Fax: 979-845-1389

Web: <http://otsweb.tamu.edu>

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

OTSC Spring Advisory Committee Meeting

The OTSC advisory committee met via conference call on March 18, 2020 to discuss issuing a letter stating the Texas feed and fertilizer were a part of the critical infrastructure (issued March 19, 2020) and on April 16 as part of its regular scheduled meeting. The OTSC advisory committee discussed market chain disruption by the novel corona virus, managing the risk of ractopamine and sodium pentobarbital, the importance of producers reviewing their contracts with grain dealers to understand who may be legally responsible for grain contaminated by aflatoxin, and an emerging concern involving polyfluoroalkyl substances (PFAs). The Chair of the OTSC Advisory Committee is Daniel Berglund and the Vice-Chair is Shawn Griffin.

Feed Industry Benchmarking Program Highlighted

Feed and Grain Magazine published an article in the June/July 2020 edition on “Novel methods for judging your firm’s performance” by Dr. Joan Fulton and Dr. John Foltz highlighting a benchmarking program developed by OTSC personnel. The article provides the information to help guide decisions and prepare for strategic moves by comparing key ratio analysis internally over time and again compared these with others in the same feed and grain business through the online Feed Industry Benchmarking website (Benchmarkfeed.com). This online benchmarking website provides participant anonymity and data security, and the user can perform benchmarking by three simple steps: add feed mill location, add feed and economic data for each quarter/year, and evaluate benchmark & rank your mill.

The screenshot shows the website interface for the Feed Industry Benchmarking Program. The header includes the site name and a navigation menu. The main content area features a bar chart titled "Public Weight Ratio (%)" with data points for various quarters. Below the chart, there are sections for "Why Benchmark?" and "Steps in Benchmarking".

Quarter	Public Weight Ratio (%)
Q1 2019	100.00
Q2 2019	100.00
Q3 2019	100.00
Q4 2019	100.00
Q1 2020	100.00
Q2 2020	100.00
Q3 2020	100.00
Q4 2020	100.00

OTSC Welcomes New Texas Feed & Fertilizer Control Service Inspector

Randelyn ‘Randi’ Roberts, who was born and raised in Alvin, Texas, joined OTSC in February 2020 as an FFCS Inspector. After high school, she attended Tarleton State University and received a Bachelors in Animal Science. Her agricultural experience includes animal breeding, rehabilitation and nutrition, and previous work as a Quality Coordinator for a large animal feed manufacturer. This education and experience has prepared Randi to protect consumers and enhance agribusiness as an OTSC field inspector. In her free time she likes to attend barrel racing jackpots, play with her two Australian shepherds, and hang out with family and friends.

