

## Virginia State Feed Association

***Update:***  
***FSMA, Farm Bill, Salmonella,  
Ethoxyquin & Inspection Tips***

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**American Feed Industry Association**



## Topics to be Presented

- **Food Safety Modernization Act:  
Here come the rules!**
- **Farm Bill Changes**
- **FDA's *Salmonella* policy**
- **Ethoxyquin Rule and Use  
Requirements**
- **Inspection Tips**



## Food Safety Modernization Act

- Signed into law in 2011
- Rules delayed due to high costs of \$1.2 billion
- Proposed food & produce rules out
- Rules are patterned after HACCP
- Feed rules will be out soon



## Food Safety Modernization Act

- FDA requires reregistration of all feed, ingredient and pet food facilities by January 31<sup>st</sup>.
- Basis of new rules is each facility must have a written hazard ID and preventive controls program for all hazards reasonably likely to occur



## Food Safety Modernization Act

- **Timeframe: Rules out soon, 120 days comment, final rules out early 2013, enforcement in 2014.**
- **Exempt firms described as very small businesses based on sales of \$250,000-\$500,000-\$1,000,000**
- **Feed rules will also have GMP rules**



## Food Safety Modernization Act

- **AFIA has five working groups involved in guidance and comments**
- **Will have a webinar three weeks after the rules are published**
- **Proposed rules don't vary much from final rules**
- **AFIA SF/SF program will comply**



## What Should You Do?



[www.safefeedsafefood.org](http://www.safefeedsafefood.org)



## *Farm Bill Extension*

- **Commodities:** current programs extended to Sept. 30, including peanuts and sugar
- **Dairy programs** extended through Dec. 31
- **Conservation:** Kept at 32 million acres; \$50 million mandatory changed to \$10 million in discretionary spending
- **Disaster assistance:** 4 programs extended to Sept. 30, 2014



## ***Farm Bill Extension***

- **Programs: Livestock indemnity, forage, emergency assistance livestock, bees, fish at \$50M and trees at \$20M**
- **Research: Organic and specialty crop funding reduced and no longer mandatory**
- **Energy: Bioenergy program extended through 2013 crop year**
- **Trade: Programs extended to Sept. 30**



## ***Farm Bill Extension***

- **Terminated programs: Most food donation programs, survey and reporting requirements of school lunch programs, pending rural development grant applications, ag marketing development programs, National Sheep Industry Improvement Center and rural microentrepreneur assistance program and asparagus assistance program**



## ***Farm Bill Extension***

- **Bottom line: Dairy folks happy, sheep, organic, food banks and asparagus are not happy.**
- **Extensions cost \$6-9B!**
- **Very poorly handled**
- **Discussions have begun for the full renewal to be effective Oct. 1 with a real Farm Bill**



## ***Salmonella in Feed and Ingredients***

- **In 2010, FDA published a draft CPG that proposed to remove the reg that says all salmonellae in feed are adulterants**
- **Proposed to replace with 8 serotypes for all feed, for specific species feed**
- **Very good news, these are not found in feed**
- **However, for ingredients, more complicated**





## Salmonellae Prohibited in Specific Feed

Poultry feed with *Salmonella* Pullorum, *Salmonella* Gallinarum, or *Salmonella* Enteritidis;  
Swine feed with *Salmonella* Choleraesuis;  
Sheep feed with *Salmonella* Abortusovis;  
Horse feed with *Salmonella* Abortusequi;  
and  
Dairy and beef feed(s) with *Salmonella* Newport or *Salmonella* Dublin.



## *Salmonella* in Feed and Ingredients

- FDA says rabbit feed okay, but will focus on dog and cat food
- Milk replacer *Salmonella* findings will be on a “case-by-case” basis
- “Direct-Human-Contact” or D-H-C will be around the home and dog/cat good only
- New policy out soon and already in practice



## Ethoxyquin

- **FDA issued a stakeholder or constituent letter to the feed industry**
- **The letter reminded firms that there is a 150 parts per million limit in final feed**
- **Firms need using ethoxyquin in ingredients need to convey the amount to the feed manufacturer.**



## Ethoxyquin

- **Reminded us of the approved uses for this:**
  - (a) It is intended for use only: (1) As a chemical preservative for retarding oxidation of carotene, xanthophylls, and vitamins A and E in animal feed and fish food and, (2) as an aid in preventing the development of organic peroxides in canned pet food.





## Inspection Tips

- Know your rights and obligations and their rights and obligations
- Inspectors cannot stop or start a plant
- FDA inspectors cannot interview employees
- Not entitled to see tonnage amounts
- Not allowed to see prices
- Copy what they copy



## Inspection Tips

- Never let an inspector roam freely; have a designated escort each time
- Inspectors are there to collect EVIDENCE
- Keep notes of what the inspector, says, does and whatever samples s/he takes
- Don't keep them waiting
- Review 483s and ask for corrections



## Inspection Tips

- Be polite and think of it as an opportunity to show off your plant and company
- Don't allow photographs
- If an inspector can see it, they can copy it
- In rendering plants have wide access to records due to BSE rule
- Not allowed to see prices



## Inspection Tips

- Most follow your safety protocols (e.g. sign-in, wear bump caps, fall protection, etc.)
- Don't sign affidavits without legal review
- Take samples that they take
- Follow-up quickly on any deficiencies in writing and in warning letters
- Commissioner now allows for CEOs to be criminally liable and cited.



## Inspection Tips

- **And ALWAYS remember: They are there to collect EVIDENCE that can be used in criminal or civil trials or in your competition's complaints!**



**Thank you!**  
**Questions/Discussion**



[www.ifeeder.org](http://www.ifeeder.org)



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## Pet Food Facility Certification Programs



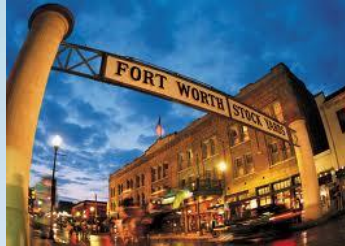
Pet Food Manufacturing  
Facility Certification Program



Pet Food Ingredient  
Facility Certification Program



# 2013 Spring Meetings & PISC



## Purchasing & Ingredient Suppliers Conference

March 11-15, 2013, Fort Worth, TX



## AFIA's 4 Promises to Our Members...

Our 4 Promises to our members...

We Will Provide Expert  
Legislative & Regulatory  
Leadership.



Our 4 Promises to our members...

We Will Offer Confidential  
Individual Staff Expertise  
on Demand.



Our 4 Promises to our members...

We Will be the Active  
Voice for the Total Feed  
Industry.



Our 4 Promises to our members...

We Will Offer Unparalleled  
Member Services

