

FSMA and Animal Food

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Topics to be Presented

- **Food Safety Modernization Act:**
 - What the animal food supplemental rule does and doesn't say
 - AFIA's reaction/concerns/questions
 - What happens next

FSMA Applies To:



All Ingredient Processing



All Feed Manufacturing



Pet Food



Feed & Ingredient Imports



Transportation

FSMA Animal Food Round 1:

- **FDA issued CGMP and Preventive Control Rule for Animal Food – Oct. 29, 2013**
- **Comment period closed March 31**
- **FDA used human food rule as basis**
- **AFIA's main concerns:**
 - **Who's covered**
 - **No separate rules**
 - **Instead use “where appropriate/for intended use”**
 - **Compliance dates**

FSMA Animal Food Round 2:

- FDA issued Supplemental CGMP and Preventive Control Rule for Animal Food – Sept. 29, 2014
- Comment period closes Dec. 15
- FDA acknowledged animal food is different from human food
- FDA made some improvements...more to go
- Not everything is re-proposed here
- Redline:
<http://www.fda.gov/downloads/Food/GuidanceRegulation/FSMA/UCM417131.pdf>

FSMA Supplemental Changes

CGMP's and Preventive Controls for Animal Food

Revised CGMP's

- **Mostly rewritten**
 - Simplified
 - More relevant to animal food
- **Removed “ill employee” provisions**
- **Added 507.28 “Holding and distribution of human food by-products for use as animal food”**
 - For clarity on requirements

Hazard ID/Preventive Controls

- **“Significant hazard”**
- **Added Supplier Verification**
- **Added Product Testing and Environmental Monitoring**
 - As “verification of implementation and effectiveness”
 - Allows flexibility – “as appropriate to the facility, animal food and nature of preventive control”

FSMA Other Issues

- **High cost – low benefit**
- **Changes to “farm” definition (Integrated operations)**
- **Compliance dates for CGMPs and PCs:**
 - **Large and other firms: 12 months post publication**
 - **Small (less than 500 employees): 2 years**
 - **Very Small (less than \$2.5 mill): 3 years**
 - **Should CGMPs and PCs be phased in?**
 - **AFIA says YES: 1, 2, 3 years CGMPs; 2, 3, 4 years PCs**

What Should You Do?

AFIA Regional FSMA Seminars

PHASE	TIMING	TOPIC
Phase I	Summer-Winter 2014	Overview of the Food Safety Modernization Act Proposed Rules and AFIA Recommendations; Fundamentals for Complying with FSMA
Phase II	Spring 2015	Completing an Effective Hazard Analysis; Implementing Preventive Controls; Requirements for Effective Corrective Actions
Phase III	Summer-Fall 2015	Developing an Effective Animal Food Safety Plan

What Should You Do?



www.safefeedsafefood.org

FDA's Animal Food Webpage:

<http://www.fda.gov/Food/GuidanceRegulation/FSMA/ucm366510.htm>

Questions?