

REGULATORY

AAFCO and FDA Working Hard to Develop Mandatory Feed Controls

Separate, but similar tracks to develop mandatory feed controls are being pursued by state and federal regulators through the Association of American Feed Control Officials (AAFCO) and FDA. Currently, the only regulatory process controls on feed manufacturing are the federal Current Good Manufacturing Practices Regulations (CGMPRs) in the Code of Federal Regulations (21 CFR, Part 225) for medicated feed. Both FDA and AAFCO's proposals would regulate all feed, ingredients and pet food.

AAFCO's efforts are occurring in the Feed Manufacturing Committee. What started out as a set of voluntary guidelines and checklist for Best Management Practices has evolved into a full-blown effort to develop mandatory model feed manufacturing regulations for all feed, pet food and ingredients. When asked why AAFCO and FDA are separately pursuing different tracks, an AAFCO official answered, "This is in case FDA's efforts are derailed.". Also state officials are part of the FDA rule development team.

FDA's efforts would likely have more impact on the feed industry, as any AAFCO model would need approval by each state before being effective. Also, product manufactured in one state that does not adopt the AAFCO model rule and distributed in another state that has the rule would be at an advantage, as the cost of regulation would not impact the products manufactured in the non-rule state. Any FDA final rule would have effect nationwide and would likely affect on-farm feed production as well.

FDA's AFSS is a comprehensive, risk-based feed safety system being designed to cover both animal feed and human food safety. The deliberative and transparent process is designed to provide the highest input by all stakeholders. FDA has provided regular updates to the process and encouraged comments by all involved.

The most recent FDA documents include the introduction of four components to the program as follows: 1) Ingredients and approval process. 2) Limits for animal feed contaminants. 3) Process control for the production of feed ingredients and mixed feed. 4) Regulatory oversight. FDA also intends to discuss a draft risk-ranking model under development by the agency for determining the relative risks of the numerous hazards that may be present in animal feed. FDA is soliciting comments on these components and approaches.

FDA is holding the second AFSS public meeting in Omaha, NE, April 5-6, 2005 at the Crowne Plaza Hotel. More information can be found at: <http://www.fda.gov/cvm/index/updates/AFSS05.htm>. Also, further information on AFSS, including highlights and presentations from the last public meeting in Herndon, VA, September 2003 at the same website.

AAFCO will review and consider comments to its latest draft Model Feed Manufacturing Regulations after the Omaha, NE meeting at a separate task force meeting later in April. AFIA's Marlene Petersen, chair of the AFIA Feed Control Committee and with Milk Specialties Co.; Gail DeGreeff, member of the committee; and AFIA VP Richard Sellers are participating on the AAFCO task force.