CDFA’s Feed Inspection Program Update

Jenna Areias, Program Supervisor
Feed, Livestock Drugs & Safe Animal Feed Education Programs
Presentation goal:

Provide you with a overview of:

• Where we’ve been
• Where we are headed
• What’s expected to change
• What we are proposin

(Logo of California Department of Food & Agriculture)
2013 Technical Working Group:

- Formed with members of the Feed Inspection Advisory Board, Inspection Services division, Feed, and Laboratory program staff.
  - Recognized the Feed Inspection Program needed to evolve in order to better serve the CA Feed Industry
  - Know that US FDA’s FSMA implementation would occur over the next several years
  - Identified areas of opportunities for increased effectiveness and change within the Program
  - Acknowledged changes that need to occur under the current “CDFA Umbrella” i.e. regulation adoption/development etc.
  - The Feed, Livestock Drugs and SAFE programs is undergoing a “transition” in these workload/organizational activities in order to assist the industry in compliance with FSMA.
CDFA’s National Participation:

**Jenna Areias:**
- Chairperson of the AAFCO Feed Labeling Committee
- Member of AAFCO’s Education and Outreach Committee
- Member of AAFCO’s National FSMA Implementation Task Force
- FDA’s Current Good Manufacturing Practices Task Force
- Animal Feed Safety Systems (AFSS) working Group through FDA
- National AAFCO Investigator for Distillers and Brewers Products
- Commissioned with US FDA to Perform Tissue Residue and BSE Investigations, nationally

**Mike Davidson:**
- Appointed by AAFCO and FDA to its Animal Feed Alliance working group and their Food Safety Alliance working group. He is the program’s technical expert in feed ingredients and feed manufacturing processes.
- Vice-Chair of AAFCO’s Feed and Feed Ingredient Manufacturing Committee.
- Member of AAFCO’s Inspection and Sampling committee
- Member of AAFCO’s Model Bill Committee
- Participant in the National Curriculum Development for all Feed Regulators through the International Food Protection Institute.
- National AAFCO Investigator for Whole cottonseed and citrus products
- Commissioned with US FDA to Perform Tissue Residue and BSE Investigations, nationally
Feed Standards Implementation

- Cooperative agreement
- Total amount: $300,000 – Feed Program; $150,000 – CAC laboratory
- DURATION – 5 years
- 11 standards to implement

Senate Bill 27 – Livestock Drugs

- SB 27 and the VFD Rule
- Changes at the Feedmill:
  - Record retention
  - Production record and label retention
  - Veterinarian VFD
  - Product labeling

FSMA Industry Preparation

- Proposal for FDA Includes:
  - Industry education and outreach material
  - Comparison matrix
  - Proposed Inspection Checklists
  - Outlined proposed compliance timeframes
1. What is FDA/CDFA's approach?
2. What do I need to know/do in order to comply?
3. What will change? By when??
4. Who will be inspecting our firm?
5. What will it cost?
6. FSMA & CDFA
Proposed Outreach and Education Strategy

OUTREACH & EDUCATION

• Workshop Timelines
• Educational Material Development
• Industry Resources
• Qualified Individual Training
• Agency and Association Collaboration
March 2016

- SAFE will work with CGFA to host a FSMA Informational Seminar specifically designed to educate feed mill managers and members of industry about the new regulations and how these changes may be applied to daily firm activities. The seminar will be held in collaboration with Dave Fairfield, National Grain and Feed Association and Matt Frederking, Ralco Ag Solutions Incorporated.

2016-2017 Qualified Individual Training Workshops

- In an effort to promote firm compliance with the newly mandated FSMA regulations, SAFE will host Qualified Individual Workshops quarterly beginning September 2016. These workshops will be 2-2.5 days and will result in certifying Qualified Individuals for firms. Dates of workshops are below:
  - September 2016
  - January 2017
  - April 2017
  - August 2017
  - November 2017
SAVE THE DATE

March 10, 2016 / 9am-4pm
Location: Modesto, CA

Food Safety Modernization Act
Informational Seminar

Assisting firms with implementation strategies

Presented by:

DoubleTree Hotel, 1150 9th Street, Modesto, CA 95354
www.cota.ca.gov/HDIS/FeedInspectionProgram.htm
Proposed FSMA Implementation strategy

COMPLIANCE & ENFORCEMENT

- Equivalency Matrices
- Proposed Compliance timelines based on FDA firm size
- Inspection Checklists for:
  - cGMP’s
  - Supplier Verification
  - Hazard Analysis and Preventive Controls
  - Food Safety Plan
- Inspector Manual that includes SOPS for Program activities
- AFRPS Implementation
PLANT AND GROUNDS

1. The grounds around animal food plant under the control of the management of the establishment are kept in a condition that protects against the contamination of animal food.

Maintenance of grounds includes:

- a. Proper storage of equipment, removing litter and waste, and cutting weeds or grass within the immediate vicinity of the plant that may constitute an attractant, breeding place, or harborage for pests.
- b. Maintaining driveways, yards, and parking areas so that they do not constitute a source of contamination in areas where animal food is exposed.
- c. Grounds have adequate draining as not to contribute to a contamination of animal food.
- d. Waste is treated and disposed of in a way that it does not constitute a source of contamination in areas where animal food is exposed.

2. The plant is of suitable size, construction, and design to facilitate cleaning, maintenance, and pest control to reduce the potential for contamination of animal food, animal food-contact surfaces, and animal food-packaging materials.

   Including:

   - a. Adequate space between equipment, walls, and stored materials to permit employees to perform their duties and to allow cleaning and maintenance of equipment.
   - b. Be constructed in a manner that the drip or condensate from fixtures, ducts, and pipes does not serve as a source of contamination.
   - c. Provide adequate ventilation (mechanical or natural) where necessary and appropriate to minimize vapors (e.g. steam) and fumes in areas where they may contaminate animal food and in a manner that minimizes the potential for contaminating animal food.

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**Equivalency Table**

<table>
<thead>
<tr>
<th>FSMA Regulations/Requirements</th>
<th>CA GMP Inspection Checklist</th>
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<tbody>
<tr>
<td>§507.14 (a) The management of the establishment must take reasonable measures and precautions to ensure that all persons working in direct contact with animal food, animal food-contact surfaces, and animal food-packaging materials conform to hygienic practices to the extent necessary to protect against the contamination of animal food.</td>
<td>1. The management of the establishment takes reasonable measures and precautions to ensure that all persons working in direct contact with animal food, animal food-contact surfaces, and animal food-packaging materials conform to hygienic practices to the extent necessary to protect against the contamination of animal food.</td>
</tr>
<tr>
<td>§ 507.14 (b) The methods for conforming to hygienic practices and maintaining cleanliness include: (1) Maintaining adequate personal cleanliness; (2) Washing hands thoroughly in an adequate hand-washing facility as necessary and appropriate to protect against contamination; (3) Removing or securing jewelry and other objects that might fall into animal food, equipment, or containers; (4) Storing clothing or other personal belongings in areas other than where animal food is exposed or where equipment or utensils are cleaned; and (5) Taking any other necessary precautions to protect against the contamination of animal food, animal food-contact surfaces, or animal food-packaging materials.</td>
<td>2. The methods of conforming to hygienic practices and maintaining cleanliness include: a. Maintaining adequate personal cleanliness b. Washing hands thoroughly and in an adequate hand washing facility as necessary and appropriate to protect against contamination. c. Removing or securing jewelry and other objects that might fall into animal food, equipment, or containers. d. Storing clothing or other personal belongings in areas other than where animal food is exposed or where equipment or utensils are cleaned e. Taking any other necessary precautions to protect against the contamination of animal food, animal food-contact surfaces, or animal food-packaging materials.</td>
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§507.17 Plant and grounds:

- The grounds around animal food plant under the control of the management of the establishment are kept in a condition that protects against the contamination of animal food.

   Maintenance of grounds includes:
Baseline Program Readiness: October 1, 2015 to September 30, 2016

Staff Training
- Qualified Individual Trainers
- Hazard Analyses and Preventative Controls
- Feed Industry HACCP

Feed Manufacturer Readiness FSMA GMP Inspections – Large Firms
Feed Manufacturer Readiness FSMA GMP Inspections for small firms (High Risk, High Tonnage)

Year One Inspections October 1, 2016 to September 30, 2017:

FSMA GMP Inspection – Large Firms
Feed Manufacturer Readiness FSMA GMP Inspections for small firms (Medium Risk, Medium Tonnage)
In Conclusion...

https://www.cdfa.ca.gov/is/ffldrs/feedlvstkdrugs.html