

Breakout Group 6B

Question 1) What components do you agree with? Why?

Question 2) What components do you disagree with? Why?

- How can you decide on oversight before deciding risk?
- Thinking that tolerances should be established by the government?
- Focus on significant significance of risks
- Flexibility needed?
- What are the real priorities?
- What are the hazards AND risks?
- ADULTERATION/CONTAMINATION/MISBRANDING -- substitute "controlled feed hazards"
- Bottom up approach to RA for all segments
- Transportation - delivery complete
- Certain on farm processes - farm doesn't produce feed, produces animals
- Mixed feed products on farm are "held for sale" for purposes of jurisdiction - FDA
- Recognize that different components need to be treated differently.
- FDA recognizes difference - looking to incorporate similarities - commonalities
- Trace/training/SOPs/Control variabilities
- What are the hazards?
- How do you control hazards?
- Have you trained to meet those controls?
- If there is a problem, it's likely to be likely to be an "off the screen" producer. Additional costs to reputable dealer will not affect these folks.
- Strengthening application of AAFCO rules would make it more consistent.
- Ingredients - key elements (background) test for hazards.
- Work upstream from product?
- Product expectation (process internal)
- Regulatory component to that product - absolute for that product.
- Process begins where: "at the beginning"
- Economics/customer expectations
- Flexibility in naming hazards
- Specifications
- What exists on the book?
- Should process control be a part of AFSS?
- Problem-oriented fixes - can replace with more comprehensive issue?

Question 3) Have we missed a major component or an element within a component?

- Traceability

- Educator/trainer
- Point of origin
- Record keeping “nightmares”
- Mandatory system many have IP issues (complete bottom up RA)
- VSIP
- Are the components all part of the umbrella?
- 4 Basic Components
- Process Control
- Others
- Who chooses?—not there yet
- Industry developed systems are acceptable
- Consistency

How Can the AFSS Help You?

Question 4) Create and maintain a level playing field?

Question 5) Address risks to human and animal health? (Provide examples)

Question 6) Assist in domestic and international trade?

Question 7) Ensure economic benefits? What are the cost concerns?

Question 8) In other ways?

- Incorporate feed safety into your existing QA program?
- How can we help you build your system?
- Utilize trade assignments as part of education team - may add program certifications
- MEET UNIFORM MINIMUM STANDARD
- Without defining hazards, how can you document improvement?
- Medicated feed cGMPs are a “shining example” of what works
- Transportation
 - Mission impossible
 - Ancient equipment
 - Verification of clean out
 - Backhauls (garbage, hazardous waste, metal scrap)
 - Product disposal (trucker’s discretion)
 - Rail car shortage (dedicated cars/trailers)
 - Regional differences (108 rails cars/54s/16s)
 - Ruminant MBM - HOLD own lease
- Start plugging gaps
- Coordinate with DOT
- Increased regulations can increase risk
- Approved suppliers
- On-farm safety issues
 - Feeding food producing animals -- customer satisfaction?
 - Education ***
 - ID the risks! Bottom up!
 - Finding and inspecting ruminant feeders

- What is the risk?
 - Perceived risk?
- Some risks are decreasing because of increased compliance.
- What is the risk of unapproved ingredients?

- State regulatory programs more effective
 - +++ funding
 - Reinforce use and compliance with AAFCO definitions.
 - Define risks and hazards - focus on bad actors.
 - Voluntary process control
 - Capable, trained personnel

Others?

- Industry involvement
 - Representatives
 - What do you think are the risks?