ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS, INC.

July 23, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
12420 Parklawn Drive, Rm. 1-23
Rockville, MD
20857

Docket No. 97N-0074

This is in response to the Federal Register Notice (Vol. 63, No. 188) requesting comment on the Food Safety Initiative Strategic Plan. Comments were requested in January of this year. We appreciate that this time line has passed but would hope that it is not too late to contribute our comments for consideration in your deliberations.

By way of introduction, I am writing on behalf of the Association of American Feed Control Officials (AAFCO). AAFCO is an organization through which regulatory officials work together to administer feed laws. This includes the development of regulatory standards, definitions and policies to be followed in enforcing feed laws. Regulatory officials involved with AAFCO include the various states, FDA, USDA, Canada, Puerto Rico and Costa Rica. This has helped balance regulatory activities at the state and federal level.

More and more emphasis is being placed on the food production continuum. Stakeholders from regulated industries to consumers are demanding a more integrated regulatory approach. The importance of ensuring that our animals receive safe and effective feed generally doesn't receive much visibility or priority with regulatory groups. While animal feed is not one of the most glamourous programs, it is at the foundation of food production. Both state and federal programs have laboured to provide regulatory oversight in a minimally resourced area over the years.

AAFCO formed a Feed Safety Task Force a couple of years ago to review AAFCO operations with a view to developing a stronger feed safety orientation. The Task Force evaluated available information and made recommendations for the development of a model feed program to use as a guide by regulatory groups.

Concurrent with the developments in AAFCO was the release of the May 1997 document: "Food Safety From Farm to Table: A National Food Safety Initiative". This and the subsequent document in October 1997 focussed on microbial contamination. We were encouraged to see this Federal Notice indicate a broadening of this food safety work to include issues beyond microbial

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"No social or economic piece of legislation can be effectively enforced unless it is viewed and supported with some sympathy and understanding by the responsible members of the regulated industries."

ones. The inclusion of other hazards is essential to a truly integrated approach and more appropriately supports systems such as HACCP. The current dioxin/PCB food contamination incident from Belgium truly drives home this message.

Last fall saw the development of the Integrated Food Safety System group comprised of representatives from all states. Representatives from the State Departments of Health and Agriculture were selected for the various work groups. Associations, such as ours were not represented per se. Instead, we had to rely on members who had to work through their state representative. Almost none of the state representatives come from the feed area. As a result, AAFCO has found it very difficult to provide input to this important work.

Most state feed control officials did not seem aware of the developments going on in this group. To follow up on this, we surveyed AAFCO members to find out how well informed they were, if they knew who their state representative was and whether they were being asked for input into the process. Twelve states indicated an awareness of the documents and only ten knew who their representative was. On the positive side, twenty one states commented. Only four felt that feed program activities are adequately represented on the Integrated Food Safety System Coordinating Committee.

Feed production is at the heart of the food production system. Belgium provides an excellent example of the need for an integrated food safety system. A contaminated feed ingredient at the beginning of the food production system was rapidly disseminated via the feed manufacturing and distribution process to many farms in several countries within a month. The animal food products from these farms were in turn distributed or further processed and distributed. Trying to trace back the origins of the many ingredients in processed food has occupied many regulatory groups in a number of countries for the last two months. Needless to say evaluating additional system controls to prevent this and better identification procedures for traceback will occupy us all for months to come. Having adequate feed expertise resident on the Coordinating Committee and/or Working Groups is essential to designing a truly integrated system. We recognize your restrictions around including associations in this effort. However, we would be happy to recommend state feed control experts who could work with you and provide liaison back to AAFCO. We, in turn, can disseminate the information and obtain feedback as necessary.

The Federal Register notices invites comment on the draft vision statement with six questions. They are identified and addressed as follows:

1. The last line about accepting responsibility could be expanded beyond just "accepting". Not only does everyone need to accept responsibility, they need to fulfill it too (i.e. go beyond words to actions).
2. & 3. Barriers include lack of education, information, commitment, money, regulations, enforcement, etc. While a lot of information seems to be out there, many people don't seem to be getting it. Focussing concise pieces of information to target groups to educate them may help (i.e. to overcome information overload). Commitment at every level of food production and

within from workers to management is essential. They need to be "sold" on the importance of food safety. System control implementation can be costly, however, the efficiencies gained usually outweigh the cost. Again, case studies illustrating this should be developed to "sell" industry stakeholders. Inconsistent regulations and enforcement across food production sector compromise the system. A good risk based approach, that evaluates all parts of food production and applies system controls at the appropriate points should be a much more effective way to target industry control measure and regulatory resources.

4. In the short term, the food production system needs to be fully identified, risk assessment carried out across commodities and risk management strategy identified. Education/information, research, regulations, surveillance, inspection and enforcement requirements need to be assessed. This then needs to be compared to what is currently applied and decisions made around how to make required changes. Acceptable risk levels need to be determined to resolve shortfall issues if applicable. An implementation plan needs to be prepared for the long term changes as appropriate.

5. An advisory group with key stakeholders, including public interest groups, could be formed. They could be used to solicit input in the strategic plan and implementation issues as well as a conduit to disseminate information.

6. This looks like the general approach outlined in response to Question 4. No additional comments at this time.

Both the President's Food Safety Initiative and the Integrated National Food Safety System provide opportunities to bring regulatory groups together in a more unified approach. AAFCO would very much like to foster this relationship. Please do not hesitate to contact me (613-225-2342, Ext. 4368) if I can be of assistance.

Yours truly,

Linda Morrison

Linda L. Morrison
President
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Canadian Food Inspection Agency | Agence canadienne d'inspection des aliments

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