

AFIA

AMERICAN FEED INDUSTRY ASSOCIATION

SAFE FEED/SAFE FOOD GUIDELINES



SEAL

“To establish and promote generally accepted safe feed/safe food guidelines designed to ensure continuous improvement in the delivery of a safe and wholesome feed supply for the growth and care of animals”

AFIA

Safe Feed/Safe Food Guidelines and Seal Program

I. Introduction

To demonstrate proactive food safety leadership, communicate the food safety risks to the industry, build consensus for all segments of the industry and to begin an education process, the American Feed Industry Association Board of Directors declared that the food safety role and responsibility of AFIA is “ **to establish and promote generally accepted food safety guidelines designed to ensure continuous improvement in the delivery of a safe and wholesome feed supply for the growth and care of animals.**”

As a result of that directive AFIA created the Safe Feed/Safe Food Seal program to enhance consumer confidence in the feed and food supply.

This document lays out the Safe Feed/Safe Food Seal program for firms and facilities applying for and receiving the Safe Feed/Safe Food Seal use agreement. The responsibilities of facilities in this program are listed in the Safe Feed/Safe Food Seal application (Appendix A), and licensing agreement (Appendix B) and firms and facilities applying for use agree to the requirements of this program as described.

AFIA reserves the right to alter this program and policies with 30 days notice to the certified facilities.

II. FS/FS Seal Usage

AFIA has created the Safe Feed/Safe Food Seal program as follows:

- A. Use of the seal, logo and label statements are governed by a licensing agreement in Appendix C.
- B. Facilities agree to allow FCI third party agents to enter their facilities.
- C. Facilities agree to provide written documentation as requested to verify compliance with the Safe Feed/Safe Food Seal program requirements.

III. Fees for Licensing Safe Feed/Safe Food Seal usage

AFIA members	\$300 per year with a four year commitment.
Non-AFIA members	\$450 for the first year and \$300 each succeeding year, with a 4-year commitment

Facilities that have a current third party certification such as, FCI's RUPP, Plasma & Hemoglobin or HACCP certification will be charged \$100 for the use of the seal.

The fees include all third party audits and verifications. (Except for those facilities outside North America, which may have additional inspection charges).

Fees are based on a per plant cost. Failure to remit payment may result in decertification and additional fees for reinstatement.

Upon certification of a facility, a firm will be licensed to utilize a Safe Feed/Safe Food seal and logo and statements regarding use under the licensing rules for use and placement of the Safe Feed/Safe Food seal (Appendix C). Failure to follow the seal and logo placement and use rules for certification may result in decertification.

IV. Certifying Inspections

AFIA will contract with FCI, which uses trained, professional Certifying Agents ("Agents"). Agents are authorized to inspect and forward reports and recommendations for certification to AFIA. Also, AFIA may withhold certification subject to such changes as are suggested by the Agent and agreed to by the firm, in which case, a reinspection may be necessary. Additional inspections may require additional fees, subject to the details and time, which the reinspection requires.

V. Firm and Facility Responsibilities

In order for the certification program to be successful, full cooperation from firms and facilities must be accorded. By signing an application, a firm agrees to allow an Agent of FCI to inspect the firm's facility (ies) and agrees to comply with the provisions of the AFIA Feed Safety Guidelines program.

VI. Responsibilities of AFIA in the Program

In order to make the program's operations proceed smoothly and to provide information to facilities about the program, AFIA will provide the following responsibilities:

- A. AFIA agrees to operate this program with integrity and provide the most professional services and Agents available.
- B. AFIA agrees to promote and market the SAFE FEED/SAFE FOOD program and develop a website to generate interest in the program and add value to the SAFE FEED/SAFE FOOD seal.
- C. AFIA will add to the SAFE FEED/SAFE FOOD website the name of each facility certified within ten business days following issuance of the seal.
- D. AFIA agrees to vigorously challenge and pursue legal action against any firm or person using the SAFE FEED/SAFE FOOD seal, certificate, program statements or promotion in a way which brings disrepute on the program, violates the licensing agreement, is false or misleading, and/or is done by firms not certified by AFIA.
- E. AFIA will provide periodic reports on the program to the certified facilities, government, and other interested parties.

VII. Confidentiality

AFIA and its Agents agree all information provided to AFIA for participation in this program, including, but not limited to, applications, reports, procedures, labels, and any other documents, conversations, e-mail or similar information is confidential and may not be disclosed to any other person or organization outside of AFIA staff and Agents without the express written permission of the applicant or certified firm.

VIII. Internal Appeals Procedure

A. Commencing The Appeal

Where a facility disagrees with AFIA which has rendered a decision after reviewing a certifying inspection, the facility representative shall contact AFIA and discuss the issue. Where the issue cannot be resolved, AFIA shall contact another Certifying Agent and arrange for a re-inspection of the facility.

Within as short a time as possible, the second Certifying Agent shall inspect the facility using the same criteria as the Agent who conducted the original certifying inspection. The second Agent may allow the facility or the original Certifying Agent to provide any additional and relevant information.

The second Certifying Agent shall report back to the Appeals Committee when all relevant information has been gathered, and shall turn over all relevant information to the Appeals Committee.

B. The Appeals Committee

The Appeals Committee may be comprised of up to three AFIA members.

Every member of the Appeals Committee shall be and remain independent of the parties involved in the appeals process.

1. Appeals Proceedings

The Appeals Committee may deliberate at any location it considers appropriate.

In all cases, the Appeals Committee shall act fairly and impartially and ensure that each party has a reasonable opportunity to present its case.

The Appeals Committee shall proceed within as short a time as possible to render a final decision by all appropriate means.

The Appeals Committee shall take measures for protecting trade secrets and confidential information.

When it is satisfied that all relevant information has been presented, the Appeals Committee shall declare the proceedings closed. Thereafter, no further submission or argument may be made, or evidence produced, unless requested or authorized by the Appeals Committee.

2. Decisions

A Decision is rendered by majority vote. If there is no majority, the Decision shall be made by the chairman of the Appeals Committee.

The Decision shall state the reasons upon which it is based.

Once a Decision has been made, all parties shall be notified.

Every Decision shall be binding on the parties. By submitting the dispute to the Appeals process, the parties undertake to carry out a Decision without delay.

3. Miscellaneous

A party, which proceeds with the appeals process without raising its objection to a failure to comply with any of these procedures or any direction given by the Appeals Committee, shall be deemed to have waived its right to object.

Neither the Appeals Committee members, nor AFIA, shall be liable to any person for any act or omission in connection with the appeals process.

In all matters not expressly provided for in these procedures, the Appeals Committee shall act in the spirit of these procedures and shall make every effort to make sure that the Award is enforceable at law.



AFIA SAFE FEED/SAFE FOOD GUIDELINES RISK and HAZARD IDENTIFICATION

Class	Potential Hazards	Potential Sources
Chemical	Dioxin/PCBs¹ Medicated feed additives² Feed additives³ Heavy metals⁴ Mycotoxins⁵ Pesticides⁶ Industrial contaminants⁷	Cross contamination in feed mill, batching error, weighing error during batching, ingredient, intentional or unintentional contamination.
Biological	BSE⁸ Pathogenic enteric microbes⁹	Contaminated feed ingredients, animal feces or urine, contamination during transport, contamination on-farm

¹Dioxin/PCB tolerance levels have not been established for feed. Generally, any levels 2 parts per trillion of dioxin (including PCBs) or higher in finished feed should result in consideration of sampling for the source of the dioxin. The government is attempting to establish baselines of dioxin in various ingredients.

^{2,3}Feed additives and medicated feed additives are defined as hazardous if used in an unapproved manner and exceed the mineral feed tolerances established by the National Research Council's *Mineral Tolerance of Domestic Animals* (NRC, 1980) or unapproved animal drug levels as defined by 21 CFR, Part 558 *et. seq.*, as applicable.

⁴Heavy metals are deemed hazardous if the levels in feed exceed the feed tolerances established by the National Research Council's *Mineral Tolerance of Domestic Animals* (NRC, 1980).

⁵Mycotoxin action levels have been established by FDA for aflatoxins, vomitoxin (DON) and fumonisin in several ingredients and finished feed. Feed and feed ingredients above these levels can be considered hazardous. Other mycotoxins may be considered contaminants at levels reasonably likely to cause harm to animals or humans based on scientific research.

⁶Pesticide tolerances for feed ingredients are established in 40 CFR, Part 180. If no tolerance is established, then the tolerance is zero and any feed ingredient, except a raw agricultural commodity (RAC), can be considered contaminated and hazardous if it contains a pesticide tolerance not established by regulation.

⁷Industrial contaminants are hazardous if they reasonably likely could cause harm to animals or humans based on scientific research.

⁸Compliance with the FDA "BSE Feed Rule" indicates adherence to these guidelines.

⁹Pathogenic enteric microbes are any microbes that reasonably likely could cause harm to animals or humans based on scientific research. Elimination or reduction of these risks indicates adherence to these guidelines.



AFIA Safe Feed/Safe Food Guidelines Product Tracing and Tracking

Purpose and Overview:

Any safety program for food or feed requires a comprehensive system of traceability within food and feed businesses so that targeted and accurate withdrawals can be undertaken or information given to consumers or regulators, thereby avoiding the potential for unnecessary wider disruption in the event of food safety problems. It is necessary to ensure that a feed business can identify the sources from which the ingredients that are incorporated into a feed or feed ingredient have been supplied. The traceability of feed or feed ingredients intended to be incorporated into the food chain shall be established at all stages of production, processing and distribution.

General Standard:

All facilities that receive ingredients or products and recombine those ingredients to create a product with a new identity must have a system of ingredient lot tracking and product tracing. Ingredient lot tracking records the individual ingredient lots used in the manufacturing process and tracks each lot to its respective lots of finished products. Product tracing provides a complete list of all ingredient lots used in any lot of finished product.

Specific Requirements:

Establishing a system where ingredients can be tracked through the process to all of their respective finished products and where all constituent ingredients in any final product can be determined, requires a record keeping system be established and maintained to:

1. Identify and record each lot of ingredient that is received for processing. Record at least the following information for each lot.*
 - a. Vendor name
 - b. Vendor contact
 - c. Address
 - d. Telephone
 - e. Expiration date (if any)
 - f. Exact product name received
 - g. Date received
 - h. Unique identification or lot number
 - i. Quantity
 - j. Type of packaging
 - k. Notes on condition of shipment and/or shipping container
 - l. Information about the transporter including part "a" to part "d" listed above.

*For the purposes of this section, bulk ingredients can utilize the same storage container, as long as the suppliers of the ingredients can be reasonably identified.

2. Establish a new identification for combined lots each time a uniquely identifiable lot is combined with another. Examples would include when ingredients are combined into a batch, or multiple batches of product, or when "premixed" batches of product already having a unique identification are combined into a single product. This would also include when multiple batches of product are combined into one pellet batch, or when multiple pellet batches are combined into a single finished product.

3. Provide a unique identification or lot number for each finished product. The number shall be shown on either the product label, invoice or shipping documents.
4. Provide a record of each shipment of finished product that identifies the destination of each product included in that shipment. The information recorded will include:
 - a. Customer name
 - b. Customer contact
 - c. Delivery address
 - d. Telephone
 - e. Expiration date
 - f. Exact product name shipped
 - g. Date shipped
 - h. Unique identification or lot number
 - i. Quantity
 - j. Type of packaging
 - k. Information about the transporter including "a" through "d" above.
5. Provide a record keeping system that will allow lot tracking such that a single lot of ingredient can be tracked forward through the process into all shipments of products containing that lot of ingredient. The record keeping system will also support product tracing such that any shipment of a product can be traced back to each lot of ingredient that is contained within that product.
6. Create a record keeping system that will produce ingredient tracking and product tracing reports within a timely manner or as determined by a state or federal agency.
7. Assure that records are retained for a minimum of three years from the date of delivery of the product to the customer. Retained records must be maintained in an easily accessible format regardless of system or data format.
8. Assure that if it is determined a product that is part of a batch or lot of feed fails to meet a feed safety requirement, that subsequent material shall be presumed to be so affected, unless further, detailed assessment provides evidence that the rest of the batch, or lot, does not fail to satisfy the feed safety requirements.
9. Assure that products entering the food chain, or are likely entering the food chain, shall be adequately labeled or identified to facilitate its traceability. Products not destined to enter the food chain are exempt from this standard.

The publication of a final rule by FDA implementing the Public Health Security and Bioterrorism and Response Act of 2002 (Bioterrorism Act) section on required recordkeeping will more clearly and consistently define any mandatory record requirements for feed, ingredients and pet food.

References:

1. Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002.

1. The facility agrees to maintain and implement the procedures, programs and agreements identified in or contained in the application for SAFE FEED/SAFE FOOD Seal submitted by the firm and to notify AFIA within two business days of any significant change in any of such procedures or programs which may result in a reinspection with resultant fees.
2. The facility will allow access at any time to any representatives of FCI or AFIA to the firm's facilities and to any and all documents regarding the procedures, programs and agreements identified or contained in the application.
3. The facility agrees to random and unannounced audits.
4. The facility agrees AFIA is the sole authority in determining this certification of facilities, and its decisions are final.
5. The facility agrees to cease use of SAFE FEED/SAFE FOOD logos, statements and promotion of this status in all facility literature immediately following any decertification action or notice from AFIA of the facility decertification. This will include ceasing the use of the logo on any products manufactured after the receipt of any decertification notice sent by AFIA, return of the SAFE FEED/SAFE FOOD certificate, which is the sole property of AFIA, ceasing notifying customers of the SAFE FEED/SAFE FOOD certification status of a facility, and notifying customers of this change in status within five business days. Products manufactured before the decertification notice may still bear the SAFE FEED/SAFE FOOD Seal. AFIA may, at its option, allow temporary use of SAFE FEED/SAFE FOOD Seal and promotion, provided the facility and firm agree to a timeframe for the immediate implementation of any changes to correct minor deficiencies.
6. The facility agrees to notify AFIA within five business days of any changes in ownership. The SAFE FEED/SAFE FOOD certification is not an asset and may not be transferred to a new owner. A new application must be filed and the facility is subject to the program's requirements, as if the facility were a new applicant to be certified.
7. The facility agrees to notify AFIA of any inspectional deficiencies within two business days if a state or federal agency notifies the facility either in writing or verbally.
8. The facility agrees to notify AFIA within two business days of any intentional or unintentional commingling which would present a feed or food safety risk. Such notice may result in the permanent or temporary loss of use of the SAFE FEED/SAFE FOOD Seal and subject the firm to other audits at the firm's other facilities.
9. The facility agrees to allow the use of their facility and firm names and location (city and state) on a website as an indicator of the status of a facility. Other information may be provided on the website subject to the facility and AFIA's agreement.
10. The facility agrees to hold AFIA, FCI, its Agents, employees, officers and directors harmless in any lawsuit arising from the certification of a facility with respect to whether a facility is in compliance with this program or any state or federal laws or regulations.
11. The facility agrees this program provides reasonable assurances that an inspected facility will follow its stated procedures, but agrees that this program is not a substitute for daily diligence in the operation of a manufacturing facility in accordance with its own procedures and applicable state and federal statutes and regulations.
12. The facility agrees this program does not directly or indirectly guarantee that any particular lot of feed or feed ingredient complies with applicable federal and state requirements, or that the facility complies with applicable federal and state requirements.



AFIA SAFE FEED/SAFE FOOD GUIDELINES AUDIT

Facility/Company Name: _____ Date of Audit _____

Facility Address: _____ Person Conducting Audit _____

Facility City/State: _____ Product Line _____

Safe Feed/Safe Food Policy, Management, Control of Documents & Records, Communication and Review	Meets Requirements *
A Food/Feed Safety policy has been defined, communicated, reviewed and implemented by top management.	
Document control procedures are in place, and documents are accessible to appropriate personnel.	
The Feed Safety Hazards listed in the AFIA Feed Safety Guidelines have been identified, reviewed and have control procedures, where applicable.	
Records retention procedures are defined and followed.	
The following records are maintained as appropriate to the product: (RUPP, medicated feed, formula/mixing instructions, production records, drug assays, label files).	
Responsible personnel review the following: audit results, customer feedback, process performance and product conformity, status of preventive and corrective actions, follow-up action from previous management reviews, planned changes that could affect the food/feed system and recommendations for improvement.	
Human Resources -Training	
Personnel are competent for assigned tasks and have been trained.	
Job descriptions are available that include the responsibility and skills required by the employee.	
Personnel are properly trained in personal hygiene, where appropriate, to avoid contamination.	
Facility Planning and Control	
A team has been formed to identify, evaluate, and control feed and food safety hazards.	
Check points where hazards may enter the facility are identified and controlled.	
Verification, monitoring, inspection, and test activities have been determined specific to the need of the product.	
Manufacturing & Processing	
Records are maintained for each product which includes product specifications, formulation, label, and special manufacturing instructions.	
Procedures exist to monitor and measure the manufacturing processes.	
Procedures exist and are implemented to compare expected and theoretical results and to reconcile any differences.	
Monitoring Devices	
Monitoring procedures have been established to evaluate incoming raw materials and finished products, where appropriate.	
Scheduled monitoring activities have been established and should include incoming raw material evaluation and finished product evaluation.	
Ingredient and finished product assays are performed on a scheduled basis, where appropriate.	

* Items which do not meet the requirements need to be explained on a separate sheet

Infrastructure - Building, Equipment and Grounds	Meets Requirements *
Procedures exist for the review and evaluation of feed and food safety hazards in the event of new or changed facilities or equipment.	
Buildings, equipment and grounds are adequately and routinely maintained.	
Buildings are of suitable construction to minimize access by pests.	
Buildings provide adequate space and lighting.	
Equipment possesses the capability to produce a homogenous product that is safe.	
All equipment is of suitable size, design, construction, precision, and accuracy for its intended use.	
All equipment is maintained to prevent lubricants and coolants introduction as unsafe additives to finished products.	
All equipment is designed, constructed, and maintained to facilitate inspection and use of cleanout procedures.	
Work areas and equipment used for the manufacture and storage of ingredients and feed are kept separate from agrichemicals.	
Procedures exist and are implemented to insure all equipment is properly cleaned to prevent unsafe contamination of feed and ingredients.	
Adequate procedures are established and used for all equipment in the production and distribution of ingredients and products to avoid unsafe contamination of feed and ingredients.	
Procedures are established to ensure a biosecure workplace.	
Ingredient Purchasing Process & Controls	
Certification for compliance to 21 CFR 589.2000 is provided by suppliers.	
Procedures are in place to monitor, qualify, and disqualify suppliers on a scheduled basis and an approved supplier lists exists.	
Procedures for conveyance of raw materials to plant are in place to ensure identification of food safety hazards.	
Identification and Traceability	
Finished product is properly packaged and labeled for traceability (e.g. production codes), and other label regulatory requirements.	
Procedures for product traceability as required by the AFIA Safe Feed/Safe Food Guidelines are documented and implemented.	
Bagged ingredients are stored in either original containers or containers with lot numbers for traceability and identification and controlled in mixing areas. Bulk ingredients are controlled in a similar manner, as appropriate.	
Traceability procedures exist to facilitate product recall.	
A sample retention program is defined and implemented.	
Daily inventories of drugs are maintained.	
Procedures for proper storage to avoid contamination are established for both raw materials, ingredients and finished products.	
Customer Related Processes	
Product specifications are defined within customer and regulatory requirements.	
Procedures for customers feedback and complaints are in place.	
Control of Nonconforming Product	
Procedures to control non-conforming product have been established and implemented.	

* Items which do not meet the requirements need to be explained on a separate sheet

Signature of person conducting this audit _____

Date _____

Signature of management confirming this audit _____

Date _____