

Breakout Group 6A - FRAMEWORK COMPONENTS AND HOW CAN AFSS HELP YOU?

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

Component #4

- Agree with regulatory oversight because of states' rights.
- Uniformity/consistency among states/across nation.
- Provides credibility and continuity to inspections (based on risk).
- Prioritization of inspections based on risk.
- Emphasis on process to develop the priorities.

Component #3

In agreement with process controls appropriate for size and complexity of products.

Validation of equivalency of the system. (Codex) - dissention ??

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

- Component #2
- "Process Controls" - prefer SOP, quality control/assurance that addresses specified risks.
- Dislike term "contaminant", too loosely used, inflammatory; prefer "foreign substance" or similar term.
- No risk-based plan to establish levels of contaminants.
- Is objective #3 too broad?
- Use "toxic residues level" instead of "contaminant". (Dissention)

Component 1

- Limitation of AAFCO Feed Ingredient Definition process vs. consumer needs.

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

- Cannot agree on meaning or terminology on all components.
- All AAFCO definitions and terms not codified.
- No recognition of existing regulations (including on-farm inspections, transportation, etc.,)
- Inter-Agency cooperation needed (est. areas of jurisdiction).
- Practicality of on-farm inspections.

Question #4: How can AFSS help you create and maintain a level playing field?

- Equity between ingredient industry and manufactured feed industry (including on-farm inspections).
- Clearly defined roles and responsibilities among regulatory agencies.
- Assist by developing educational information, SOPs, to share with producer groups for their voluntary QA programs.
- Need for agreements between regulators and regulated industry (BMP).

- Each segment of industry assumes responsibility for safety of its own products.

Question #5: How can the AFSS help you address risks to human and animal health?

- May provide information to feed segments that may not have received much attention.
- May have access to resources to address risks.
- May set limits on "foreign substances"
- By understanding risks, will be able to prioritize (risk assessments).
- Identify knowledge gaps via risk assessments.
- Afford a more uniform approach to problem solving.
- Make manufacturers more aware of their process and increase awareness of issues.
- Through collaboration, determine levels of concern.
- Determine which undesirable foreign substances present a risk as determined by scientific data and at what levels.

Question #6) How can the AFSS help you assist in domestic and international trade?

- Domestic trade
 - Regionalized application of risk assessment.
 - Improve consumer confidence.
- International trade
 - If AFSS is in line with Codex Animal Feeding Code, it opens international trade (meat) (equivalency).
- Standards based on science.

Question #7A) How can the AFSS insure economic benefits?

- Must have element of risk vs. benefit.
- Maintained consumers' confidence = maintained trade.
- Better integrated system = maintained consumer confidence (based on sound scientific risk assessment).
- Maintains defensible position.

Question 7B) What are the cost concerns?

- Additional sampling/testing will cause additional cost.
- Adds additional regulatory costs such as equipment, safety concerns, staffing, biosecurity concerns, training.
- Increased costs passed on to consumer.
- Additional regulation may be cost prohibitive to smaller producers.
- Education and training as a preventative to increased costs.
- Possibility of financial penalties (after sufficient time for education and implementation).

Question 8) How can AFSS help you in other ways?

- At what point does increased safety offset increased costs? Will there be improved safety?
- Improved over all compliance through systems approach.
- AFSS can help us be proactive.
- Certain industry sectors will implement quality assurance that don't currently have them.
- Collaborative development helps improve communication among sectors.
- Help clarify responsibilities of all parties involved.