

COMPREHENSIVE ANIMAL FEED SAFETY SYSTEM

(AFSS)

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**Animal Feed Safety System Public Meeting
Omaha, Nebraska
April 5, 2005**

Comprehensive

**Webster's defines comprehensive as
“covering completely or broadly;
inclusive...”**



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What is a “Comprehensive” Animal Feed Safety System?

A March 31, 2004 Federal Register notice announced that a draft definition for “comprehensive” was available.

We believe that a comprehensive animal feed safety system (AFSS) would incorporate each of the following eight concepts:

Range of Products

1. The AFSS would apply to the whole range of feed products, including all ingredients and finished feeds.



Ingredients

- 2. It would require the use of ingredients approved and/or recognized by an established mechanism of an appropriate regulatory agency.**

Facilities & Equipment

3. It would cover the complete range and variety of facilities involved in animal feed production.

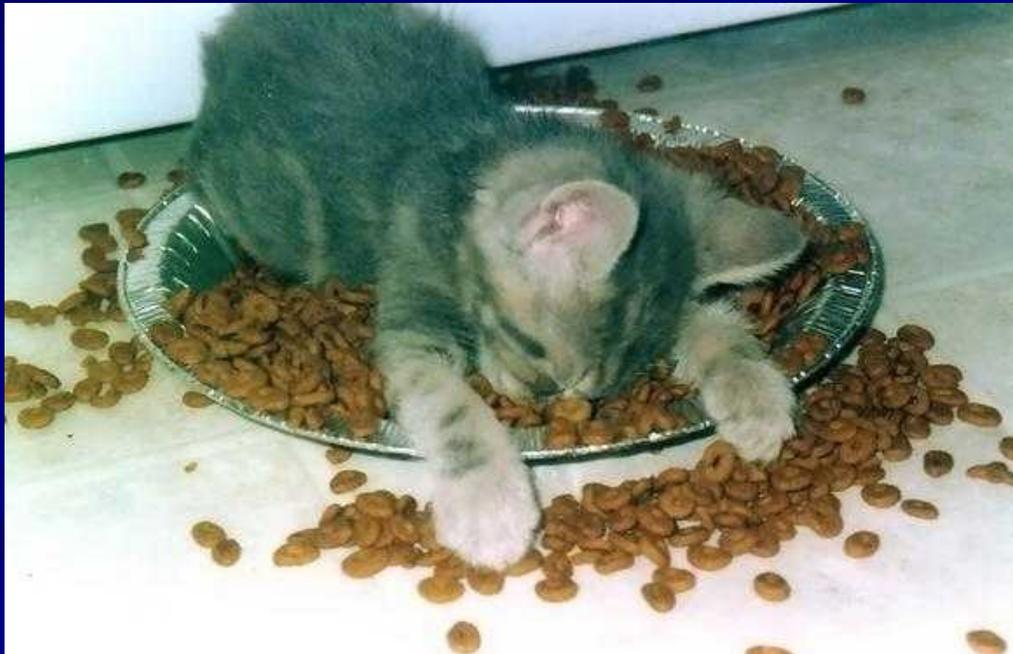


Flexible

4. It should have the flexibility to be process- or product-oriented, depending on the situation.

All Animals

5. It should address feeds produced for food and non-food animals.



Hazards

6. It should cover all known hazards, and be applicable to hazards not yet identified.



Health Protection

7. It would address both human and animal health issues.



Regulatory Oversight

- 8. It would acknowledge and coordinate regulatory oversight at all levels, including local, state, tribal and federal, involved in feed safety.**

Additional Comments

Comments suggested the addition of two additional concepts:

1. Conduct research to ensure that hazard determination is based on sound science,
2. Facilitate access to diagnostic tests that will support the AFSS concept.

