Safe Feed/Safe Food

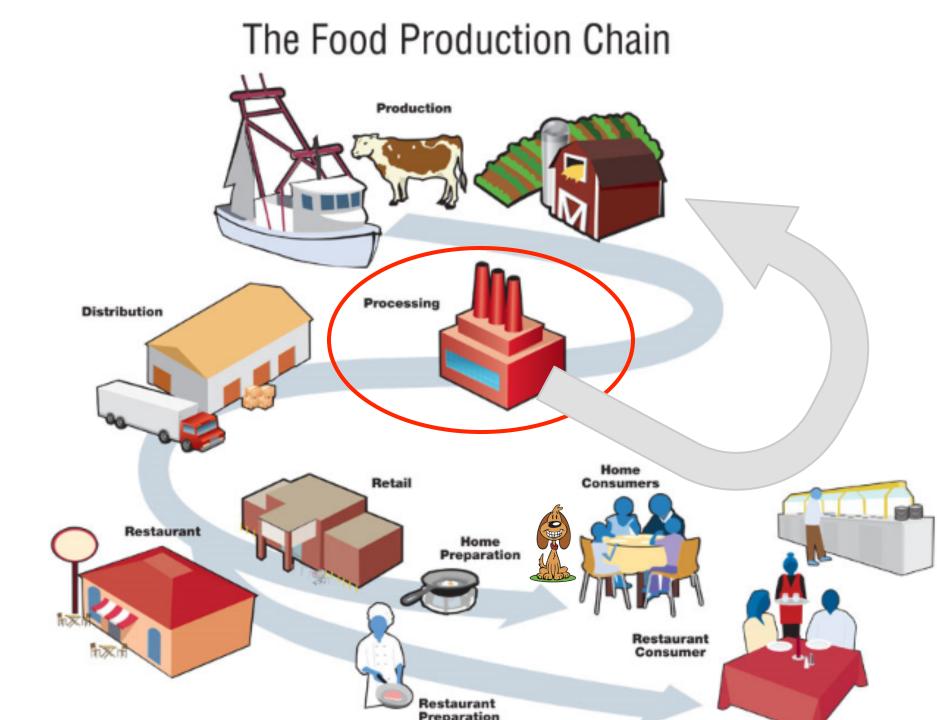
Overview of Certification Programs: Why Should a Feed Mill Get Certified?

Henry Turlington, Ph.D. Director, Quality & Manufacturing Regulatory Affairs American Feed Industry Association <u>hturlington@afia.org</u>



Why seek a certification?





Safe Feed/Safe Food

Why Should a Feed Mill Seek Certification?"

2 PRIMARY REASONS

Meet Customer Requirements

Drive Continuous Improvement within your quality and food safety program



Customer Requirements

Why do customers require suppliers to maintain a quality & food safety certification?

- Greater awareness of food (feed) safety concerns
 - Physical, chemical and biological
- More regulatory requirements
 - USA: Food Safety Modernization Act
 - Mexico and Canada also launching new requirements
- More sourcing from global markets
 - Certifications help with consistency across suppliers



Continuous Improvement

How does a certification drive continuous improvement?

- Improves effectiveness of processes.
 - Better quality, safer products, lower costs
- Senior Management commitment to quality & food safety.
 - "Culture" within the company

Ensures accountability to quality & food safety system.

- Third party (independent company) evaluation
- Promotes consistency across suppliers.
 - Important with sourcing from global markets
- Improves customer confidence.
 - Better quality, safer products, more sales



Animal Food Recall Postings by FDA 2013-14

Species	Number
Cat Food	110
Dog Food	309
Pet Food (other than Dog or Cat)	65
Livestock	11
TOTAL	495

AVMA, 2014 (www.avma.org/news/issues/recalls-alerts)



Food Safety Modernization Act

CGMP's and Preventive Controls for Animal Food

Proposed rule applies to facilities that manufacture, process, pack, or hold animal food and are required to register as a food facility under section 415 of the FD&C Act. This rule does not apply to farms that manufacture food for their own animals or other food facilities not required to register.

CGMP's

- Personnel practices and training;
- Facility operations, maintenance, and sanitation
- Equipment and maintenance
- Processes and controls
- Warehousing and distribution

Food Safety Plan

- Hazard Analysis
- Risk-Based Preventive Controls
- Recall Plan
- Monitoring
- Corrective Actions
- Verification
- Records

FSMA Animal Food Proposed Rule

cGMP's – Prerequisites

- Facility
- Human Resources and Training
- Facility Planning and Controls
- Manufacturing and Processing
- Infrastructure Building, Equipment and Grounds
- Ingredient Purchasing Process & Controls
- Identification and Traceability product recall
- Receiving and Storage of ingredients
- Labeling, complaint investigation
- Supplier Verification and Approval program



21 CFR Part 225 – cGMP's for Medicated Feeds

FSMA Animal Food Proposed Rule

Animal Food Safety Plan

(written food safety plan is required)

- Hazardous analysis
- Preventive controls (PC's) for identified hazards
- Recall plan
- Preventive controls
- Correction action procedures
- Verification procedures with frequency performed



"Nice, but we'll need an environmental-impact study, a warranty, recall bulletins, recycling facilities, and twenty-four-hour customer support."



Foreign Supplier Verification Program (FSVP)

Importers would be required:

- Review the <u>compliance status</u> of the food and the potential foreign supplier before importing the food.
- Analyze the <u>hazards associated with each food</u> (reasonably likely to occur).
- Assure hazards are <u>adequately controlled</u>.
- Onsite audits; sampling and testing; and periodic review of foreign supplier food safety records; or other appropriate <u>risk-based procedures</u>
- Implement a <u>corrective action program</u> and review supplier verification and PC's, if necessary.
- Reassess Foreign Supplier list at least every 3 years.
- Obtain a <u>DUNS number for company identification</u>.
- Records, records, records.



Accreditation of Third-Party Auditors

This proposal contains requirements for accreditation bodies seeking as well as third-party auditors. These requirements will help ensure the competence and independence of the accreditation bodies and third-party auditors participating in the program.

The proposed rule would require accreditation bodies to:

- Assess third-party auditors for accreditation
- Monitor performance of the third-party auditors it accredits.
- Assess and correct any problems in its own performance.
- Submit reports and other notifications to FDA.
- Protect against conflicts of interest.
- Records, records, records.



NSF

JKK-

🔅 eurofins



Accreditation of Third-Party Auditors

The FDA would require accredited auditors to:

- Ensure their audit agents are competent and objective.
- Conduct rigorous audits.
- Submit reports of reports of audits used for certification purposes.
- notify any condition posing a serious risk to the public health.
- Assess and correct any problems in performance.
- Protect against conflicts of interest.
- Records, records, records.

OBJECTIVE: Consistency and Creditability



Sanitary Transportation of Human and Animal Food

• Vehicles and transportation equipment:

 The design and maintenance of vehicles and transportation equipment to ensure that it does not cause the food that it transports to become contaminated.

Transportation operations:

 The measures taken during transportation to ensure food is not contaminated, such as adequate temperature controls and separation of food from non-food items in the same load.

• Information exchange:

 Procedures for exchange of information about prior cargos, cleaning of transportation equipment, and temperature control (example: milk carrier to non-milk carrier).



Sanitary Transportation of Human and Animal Food

• Training:

 Training of carrier personnel in sanitary transportation practices and documentation of the training.

• Records:

 Written procedures and records by carriers and shippers related to transportation equipment cleaning, prior cargos, and temperature control.

• Exemptions:

- Transportation activities for raw agricultural commodities performed by a farm
- Transportation of shelf stable food that is completely enclosed by a container
- Transportation of compressed food gases
- Transportation of live food animals





New FSMA Law Applies to . . .



All Ingredient Processing



All Feed Manufacturing



Pet Food



Feed & Ingredient Imports



Transportation



Why Seek Certification?

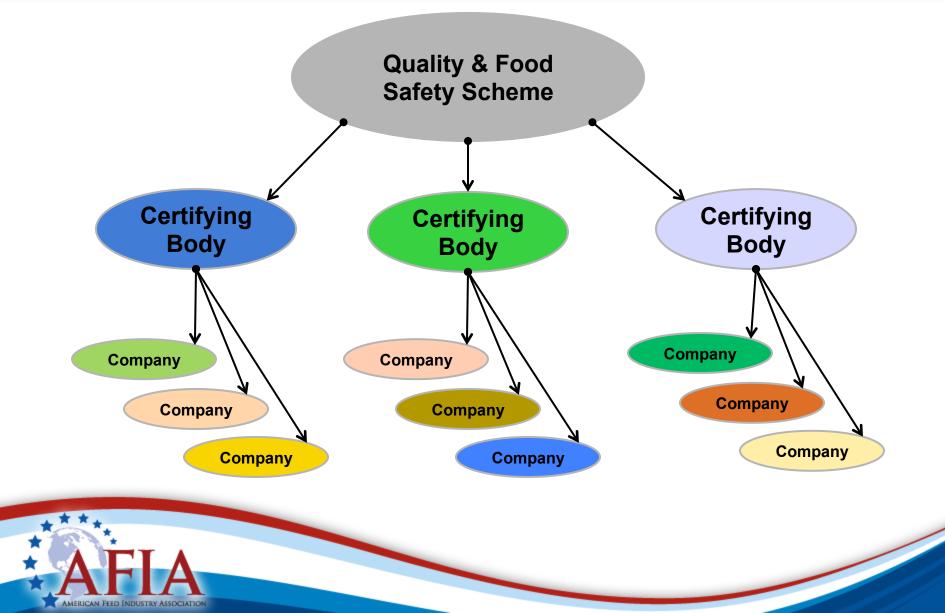


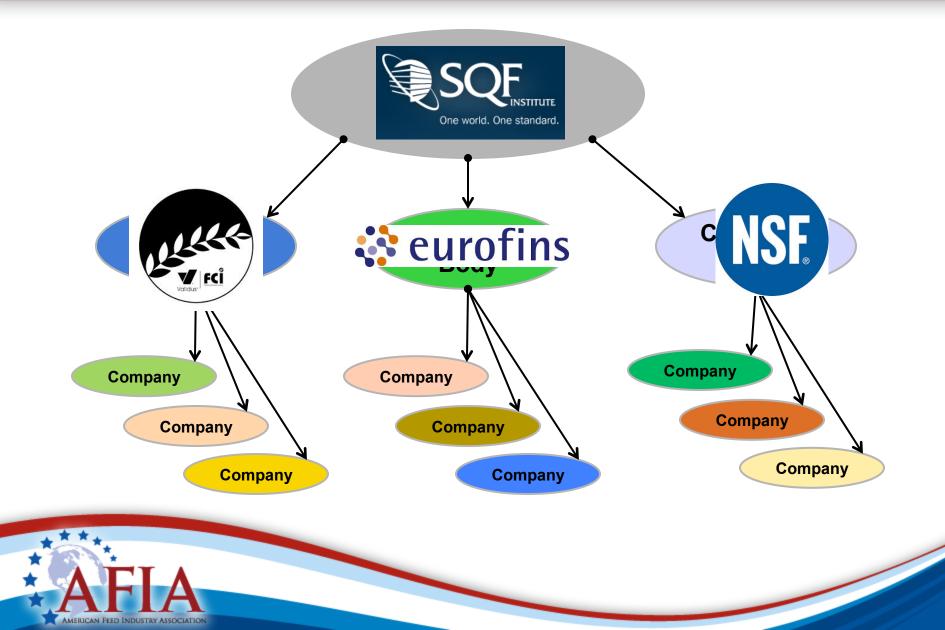
AMERICAN FEED INDUSTRY ASSOCIATION

Include several components to drive consistency and structure within the quality and food safety system.

- Management commitment
- Quality & food safety system and structure
- Personnel and training
- Infrastructure
- Product realization
- Purchasing processes and controls
- Validation and verification of preventive controls
- Animal food safety system









Feed Safety Standards – Codes of Practices – Model Programs









Food and Agriculture Organization of the United Nations



Animal Feed Manufacturers Association



British Standards









Safe Feed/Safe Food

AFIA provides multiple Safe Feed/Safe Food certification options for its members



International Safe Feed/Safe Food

Internationally recognized by FAMiQS

FSC 32 Pet Food Manufacturing Facility

GFSI recognized program that meet FSMA regulatory requirements

FSC 34 Safe Feed/Safe Food

GFSI recognized program that meet FSMA regulatory requirements

FSC 36 Safe Feed/Safe Food

Fundamentals for compliance with FSMA



Safe Feed/Safe Food

QUESTIONS

For Safe Feed/Safe Food information, contact:

- Henry Turlington (<u>hturlington@afia.org</u>)
- www.afia.org

