



COMMERCIAL FEED  
REGULATORY PROGRAM

# QUARTERLY FEED UPDATE

Issue 1 | Winter 2020

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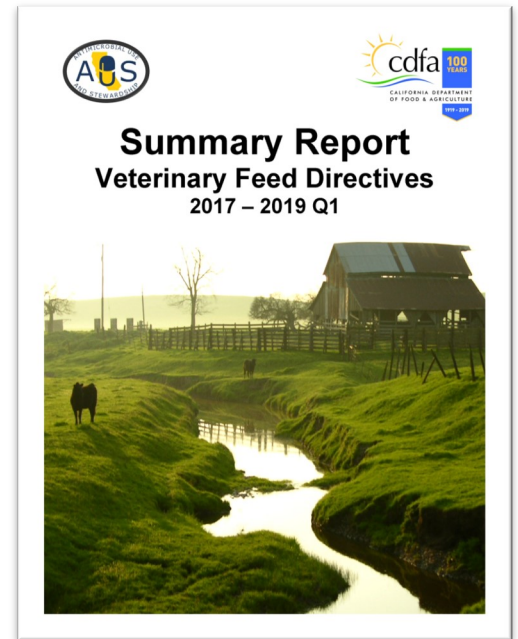
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## VFD Report Release

The Antimicrobial Use and Stewardship (AUS) program has developed a report to summarize Veterinary Feed Directive (VFD) information collected from 2017, 2018 and 2019 Quarter 1 (Q1). The release of the VFD Summary Report presents an annual illustration of VFD feed manufacturing and distribution in California. This VFD summary has been developed to provide a transparent and thorough explanation of the AUS program's involvement to ensure compliance with state and federal VFD order mandates.



A brief overview of this report is as follows:

- Food and Drug Administration (FDA) and California law that mandates the use of VFDs and components of a VFD
- Process of VFD collection, data confidentiality, compliance and aggregated information visuals
- Plans for the AUS program and future VFD collection/compliance
- In conjunction with the Commercial Feed Regulatory Program (CFRP), AUS is collecting VFD information on a quarterly basis from both manufacturers and distributors listed on the US Food and Drug Administration's VFD intent list. The information collected is held confidential in accordance with Food and Agricultural Code Section 14407. The AUS program will continue to produce a VFD Summary Report annually.

A few important notes regarding this VFD Summary Report:

- This report includes information received by the program that has been aggregated to prevent the identification of an individual farm or business.
- Due to the nature of a VFD order, they are not indicators of use trends.
- A comparison of finished feed reported in 2018 to VFD feed reported in 2018, shows that VFD feed made up 0.0910% of all finished feed reported.

The full version of the VFD Summary Report can be found at [https://www.cdffa.ca.gov/is/ffldrs/pdfs/AUS\\_VFD\\_Summary\\_Report\\_2017-19.pdf](https://www.cdffa.ca.gov/is/ffldrs/pdfs/AUS_VFD_Summary_Report_2017-19.pdf)

## Calendar

January 1, 2020  
New Year's Day

January 21, 2020  
Martin Luther  
King Jr. Day

January 31, 2020  
2019 Quarter 4  
Tonnage Tax Due

February 18, 2020  
Presidents' Day

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## Feed Program Enforcement

The feed program worked during quarter 4 of 2019 to survey retailers selling feed and ensure that all products being sold have a licensed manufacturer. The program also continued to conduct violation follow-ups and feed complaint follow-ups.

During the last quarter, the program quarantined a trainload of corn from Nebraska for levels of aflatoxin above 20 ppb.

The table below is a summary of enforcement activities for 2019 to date.

2019 Enforcement Activity	Number Issued or Found
Unlicensed Feed Manufacturers	51
Violation Follow-ups	50
Feed Complaint Follow-ups	9
Quarantines Issued	41



## FSMA Inspections - FDA Contract Year 1 Summary

In August 2019, the CFRP completed the first year of its Food Safety Modernization Act (FSMA) contract inspections for FDA. FDA inspections completed by CDFA from September 2018 to August 2019 are summarized in the table below. The table refers to Medicated Current Good Manufacturing Practices (cGMP) inspections designed for medicated animal feed only; medicated cGMP's are within the Code of Federal Regulations under title 21, part 225. Additionally, FSMA Preventive controls for Animal Food (PCAF) rule current good manufacturing practices (CGMPs) are inspections in addition to the medicated cGMP's and include inspections for all animal feed; these are referenced in the Code of Federal Regulations under title 21, part 507.

FDA Contract Inspection Type	Number of Inspections Done
Licensed Medicated part 225 cGMP + part 507 PCAF CGMP	3
Non-Licensed Medicated part 225 cGMP + Part 507 PCAF CGMP	5
FSMA part 507 CGMP + BSE	23
PCAF part 507 CGMP + Preventive Controls Audit	5
Out of Business Visits	7
<b>Total</b>	<b>43</b>

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## Hemp and Hemp-derived Ingredients and Cannabis or Cannabis-derived Ingredients

The California Department of Food and Agriculture (CDFA) Commercial Feed and Livestock Drugs Program has oversight authority over all commercial livestock feed and livestock drugs sold within or into the state of California (Food and Agricultural Code (FAC) § 14321 and 15051). The Livestock Drugs Program also oversees all livestock drug product registration and labeling requirements for the state of California (FAC § 14281 - 14296).

Recently, the Agricultural Improvement Act of 2018 (Farm Bill) legalized the growing of hemp, yet it did not grant the right to use hemp and hemp products in food or drugs for livestock. Over the last five years California has adopted several new laws and regulations around cannabis production; however, cannabis for use in livestock was not permitted.

All hemp and hemp-derived ingredients and cannabis or cannabis-derived ingredients may not be used in commercial feed or livestock drug products, as these ingredients are unapproved for livestock per the U.S. Food and Drug Administration (FDA) and subsequently have not been approved for use in livestock in California. The FDA possesses authority to regulate drug products under the Federal Food, Drug, and Cosmetic Act (FD&C Act) and Section 351 of the Public Health Service Act.

CDFA, in part, recognizes ingredients listed in the Official Publication (OP) of the Association of American Feed Control Officials (AAFCO) as being acceptable for use in livestock feed. At this time, there are no approved food additive petitions or ingredient definitions listed in the AAFCO OP for any part of hemp or cannabis. CDFA is also unaware of any Generally Recognized as Safe (GRAS) conclusions for these ingredients.

While cultivation allowances for hemp and cannabis are undergoing change, the policies and laws governing allowances for livestock feed ingredients and livestock drug products have not yet changed at a state or federal level. CDFA will take enforcement action on all livestock feed and livestock drugs containing unapproved ingredients. The FDA has provided information and frequently asked questions (FAQ) regarding this topic. For additional information, please find the FAQ here: <https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd>

Updates or changes to this policy may be made with FDA or AAFCO's approval of these products. Information regarding any changes will be sent to interested parties and posted on our website.



Have feed questions? We can help!

# CONTACT US



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[VIEW FIELD STAFF TERRITORY MAP](#)

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