Feed and Livestock Drugs Inspection Program Technical Advisory Subcommittee (TASC)

California Department of Food and Agriculture (CDFA)
2800 Gateway Oaks Drive, Room 267
Sacramento, CA 95833
(916) 900-5022

August 26, 2015 9:00 AM to 12:00 PM

MINUTES

TASC Members	CDFA Staff
Dr. Marit Arana	Ms. Jenna Areias
Dr. Stephen Beam	Dr. Amadou Ba
Ms. Natalie Krout-Greenberg	Mr. Mike Davidson
Dr. Robert Poppenga	Ms. Jennifer Goucher
Dr. Dennis Wilson	Ms. Cathryn McCandless
	Ms. Samantha Moran

INTRODUCTIONS AND ANNOUCEMENTS

Ms. Jenna Areias called the meeting to order at 9:00 a.m. Self-introductions were made, and a quorum was established. Mr. Tim Riordan was absent.

Ms. Areias discussed a recommendation that was made by to the Feed Inspection Advisory Board (FIAB) to develop a Technical Advisory Sub-Committee (TASC) to help advise the program on making technical determinations on undefined feed ingredients, the Food Safety Modernization Act (FSMA) and other issues that will affect the program. The discussion on these ingredients will pertain to whether or not the ingredients are safe to be fed, and if so, determining a safe inclusion rate of the ingredient.

Ms. Areias further stated that firms have to go through an approval process with the Food and Drug Administration (FDA) to obtain a "generally recognized as safe" (GRAS) determination. FDA collaborates with the Association of American Feed Control Officials (AAFCO) on approving feed ingredients.

Mr. Mike Davidson discussed the possibility of having a "provisional option" on undefined feed ingredients that have been proposed to FDA, where the FDA has taken no action. Mr. Davidson stated that if an ingredient is safe and it has a nutritional value

that we (CDFA) would like to allow it on a provisional basis, while the firm continues on the pathway to AAFCO approval, or FDA approval, instead of the ingredients going to compost or landfills. Dr. Stephen Beam asked if new feed ingredients would require regulations prior to being fed or if the program can directly refer to AAFCO. Mr. Davidson stated the secretary has very broad authority to approve any feed ingredient; however, if an ingredient is approved in California, it can not necessarily go across state lines or be marketed in interstate commerce. One example of this is Walnut Muller Meal.

FEED AND LIVESTOCK DRUGS PROGRAM UPDATE

Dr. Amadou Ba discussed the upcoming Fertilizer Research and Education Program conference. The annual conference will take place in Seaside, California. Staffing changes include a new Senior Environmental Scientist (Specialist), Dr. Marja Koivunen and a new Environmental Scientist, Dr. Shari LoGrossman.

Ms. Areias reported the Feed program challenges including Senate Bill (SB) 27. This bill effects the Feed program and the Animal Health Branch pertaining to Veterinary Feed Directives, and livestock drugs being sold at a retail level.

Dr. Dennis Wilson reported on Animal Health Divisions thoughts regarding the proposed stewardship program within SB 27 as well as what the Animal Health and FFLDRS Branch will need for resources and a possible funding mechanism for the bill.

Ms. Areias also updated the group on the anticipated FSMA regulations scheduled for release by FDA on August 31, 2015. Food for animals will require firms to have a food safety plan in place, identify hazards for incoming ingredients, and put in place preventive control measures to control hazards and developing prerequisite programs. Ms. Areias stated that a portion of the TASC's responsibilities will be to determine what hazards are likely to occur and to advise the program as to which ingredient hazards are biological, chemical or physical hazard in a hazard analysis.

GOALS AND OBJECTIVES

Ms. Cathryn McCandless reviewed the by-laws for the TASC as approved by the FIAB on September 18, 2013.

Ms. Areias stated that as the TASC develops, it will be not only reviewing undefined/unapproved feed ingredients, but also assisting regulation implementation associated with FSMA.

The TASC will assist the Safe Animal Feed and Education (SAFE) Program in developing examples of feed industry hazard analyses and risk based preventive controls. The TASC may be asked to review the technical aspects of the written Feed Safety Plans for compliance with FSMA.

Discussion ensued on the TASC's role regarding FSMA inspections in California.

Dr. Wilson asked if there would be an opportunity to consult with other individuals, outside of the TASC, for technical advice.

Ms. Areias stated that this would need to be reviewed and documented by the FIAB. A discussion about creating a procedure to assist the TASC on identifying consultants and the possibility of including this process into the TASC by-laws.

UNDEFINED FEED INGREDIENTS

Ms. McCandless introduced the TASC undefined feed ingredient binder. This binder contained research and summary findings on the following ingredients: black soldier fly larvae, grape seed meal, pistachio shell, prune pits and almond skins.

Dr. Wilson asked if there is a checklist available for the members to use to identify potential hazards when evaluating these feed ingredients.

Discussion ensued. Ms. Areias stated that the program would establish a checklist for the TASC members to use for undefined feed evaluation.

Ms. Natalie Krout-Greenberg suggested using the FDA GRAS approval packet as a template.

Mr. Davidson commented on the need for the field inspection team to obtain samples in the field in order to gather data on the undefined feed ingredients.

Discussion ensued on each undefined feed ingredient.

Ms. Areias determined there was a need for the program to establish a more formalized process for introducing undefined feed ingredients. The program will work with industry to gather more data on these undefined ingredients and make research findings available to TASC members two weeks prior to the TASC meetings.

FUTURE MEETING AGENDA ITEMS

The TASC discussed the need to have a Chair and Vice Chair of the TASC and agreed to recommend to the FIAB that Dr. Marit Arana be Chair and Dr. Stephen Beam be Vice Chair to the TASC.

Ms. McCandless will provide a complete list of undefined ingredients and the FDA criteria for applying for approval of an undefined ingredient.

NEXT MEETING

The next meeting is to be announced, but prior to the end of the year.

Respectfully Submitted By

Jenna Areias, Feed Program Supervisor Feed, Fertilizer, and Livestock Drugs 8/26/15 Date