Washington Regulatory Update

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Food Safety and Inspection Service

- FSIS is the public health regulatory agency in USDA responsible for safety of nation's commercial supply of meat, poultry and egg products
- FSIS issued "Pathogen Reduction; Hazard Analysis and Critical Control Point (PR/HACCP) Systems, Final Rule" in 1996
- Sets *Salmonella* performance standards for establishments slaughtering selected classes of food animals or those producing selected classes of raw ground products

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Food and Drug Administration

- Public health regulatory agency responsible for safety of nation's shell eggs, seafood, produce, dairy, etc., animal feed and veterinary drugs
- In 2012, Congress passed the Food Safety Modernization Act (FSMA)
- Under FSMA, FDA plants producing human and animal feed will have to control pathogenic bacteria, including *Salmonella*

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Salmonella

- Public health numbers are not decreasing
- Congress, White House, media and consumer groups have expressed concern over the lack of progress in improvement in public health
- FSIS strategic plan includes a 4.5% reduction in CDC food net data, equal to 22,600 illnesses

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Salmonella

- FSIS has received a petition to make certain ABR serotypes adulterants in:
  - raw ground beef (Newport and Typhimurium); and
  - raw ground poultry (Hadar and Heidelberg)
- FSIS will have to respond to petition

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Salmonella (raw products)

- If at any point the agencies determine there is specific product in commerce making people sick…
  - They have asked ask for a voluntary recall of that specific production of product

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Recent *Salmonella* Policies

Notice on NRTE Comminuted Poultry

- Reassess HACCP plans and document the reassessment by April 20, 2013
- Increased sample size to 325g
- Possible New Performance Categories depending on results of testing based on increased sample size

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Regulatory Update: Issues that Impact the Industry

Proposed Poultry Slaughter Rule for Modernization of Inspection (NPIS)

- NTF supports
  - Establishments sort carcasses prior to FSIS carcass-by-carcass inspection
  - One inspector on-line prior to chiller for inspection
  - Increase in off-line inspectors to verify slaughter/dressing controls, draw pathogen samples, etc.
  - Facility requirements for on-line inspection station
  - Maximum Line speed – 55 BPM for turkeys

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Live Production Challenges

- The Gov't wants on-farm information
  - Be aware – FDA, EPA, FSIS
- Public perception about antibiotic use
  - Consumer reports, "other science"
  - "Panera" campaign
- FDA Veterinary Feed Directive

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FDA CVM Feed Directive

- Animal Drug Availability Act of 1996 (ADAA) amended Act to establish new category of drugs, veterinary feed directive (VFD) drugs
- Drug approved for use in or on animal feed as a VFD drug is limited to use only under professional supervision of licensed veterinarian
- Final regulations covering use & distribution of VFD feeds (medicated feeds containing VFD drugs) published in *Federal Register* on December 8, 2000

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FDA CVM Feed Directive (cont'd)

- A veterinarian, operating within confines of valid veterinarian-client-patient relationship, examines & diagnoses animal conditions & determines whether a condition warrants use of VFD drug
  - If it does, veterinarian will issue signed VFD order containing information specified by regulation
    - Extra-label use of a VFD drug (or any drug) in or on an animal feed is strictly prohibited, i.e., not permitted by anyone, including the veterinarian
- Anyone intending to distribute VFD feeds must notify CVM prior to beginning distribution
- A VFD feed may not be distributed to a client without a signed, valid VFD

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Live Production Challenges

- FSMA – Animal Food Preventive Controls
- Very similar to human preventive controls
  - Will also be issued as a new section to the CFR (proposed rule)
  - Do not anticipate to require including allergens as a hazard

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Live Production Challenges

- *Salmonella* in Animal Feed
  - FDA considers an animal feed or pet food that may be injurious to health because it is contaminated with Salmonella to be adulterated
  - FDA believes likelihood of direct human contact with animal feed substantially lower than for pet foods
  - In cases of animal feed contaminated with *Salmonella*, FDA believes regulatory action is warranted when cases involve *Salmonella* serotypes known to cause disease in animal species for which feed is intended.
  - http://www.fda.gov/downloads/iceci/compliancemanuals/compliancepolicyguidancemanual/ucm361105.pdf

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Salmonella Summary

- *Salmonella* reductions are expected "farm to fork"
- From public health perspective – one of highest priorities of this administration
- "All for one and one for all" – together we can work on providing those reductions

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Questions?

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