



Voluntary Animal Food Safety Prerequisite Programs Under Development

A consortium of companies are supporting a project to develop a publicly available document outlining voluntary food safety prerequisite programs for the manufacture of animal food, feed and ingredients.

As project manager, the British Standards Institute is expected in February to release the draft document for stakeholder review and comment. Comments likely will be due by early April.

Representatives of companies involved in the project outlined its scope and objectives during presentations this month at separate meetings of the Association of American Feed Control Officials and the International Feed Regulators' Conference. Companies supporting the effort, which have international businesses involved in manufacturing and distributing both human food and commercial animal feed (including feed ingredients and pet food), are Cargill, Land O'Lakes, Nestle and Nutreco. Initial discussions which led to the project began in 2008 and were facilitated by the University of Minnesota's Center for Animal Health and Food Safety. The Food and Drug Administration's Center for Veterinary Medicine was involved in early dialogue as an observer.

The document to be released for comment to a wide range of stakeholders (including the NGFA) will consist of basic requirements known as "prerequisite programs." Such programs are specific to the industry sector to which they are applied. In the United States, these programs often are referred to as good manufacturing practices, and include such issues as appropriate construction and layout of facilities, management of purchased materials, cleaning and sanitation practices, and pest-control programs. These prerequisite programs serve as the launch pad upon which hazard analysis and critical control point (HACCP) or other types of quality-control programs are based that identify and implement controls to mitigate additional hazards that pose a risk to human or animal health.

Project participants said the initiative is an attempt to achieve broad stakeholder agreement on a consensus set of globally applicable prerequisite programs to further advance animal food safety. Doing so, they noted, would help avoid a proliferation of differing approaches that likely would disrupt commerce in animal feed, pet food and feed ingredients, while adding unnecessary costs with little offsetting benefit, something that has occurred in the human food sector. They also noted that the focus on animal food production recognizes how integral it is to the food supply chain.

The project participants said the proposed prerequisite program is derived largely from, and will be consistent with, UN Food and Agriculture Organization (FAO) and Codex

Alimentarius Commission sources, particularly Codex's code of practice on good hygiene principles. Codex, founded in 1963 by FAO and the UN's World Health Organization, develops science-based international standards designed to protect human health while facilitating trade in food, feed and agricultural products. Codex codes of practice, including one on animal feed adopted in 2004, are recognized under the World Trade Organization as the scientific basis for resolving international trade disputes.

Those involved in the project said the draft prerequisite program:

- ◆ Is being developed as a "Publicly Available Specification" (PAS) 222 document through the British Standards Institute under a project sponsored by SSAFE, a non-profit organization dedicated to fostering continuous improvement and global acceptance of internationally recognized food protection systems and standards. The British Standards Institute is the national standards-setting body for the United Kingdom.
- ◆ Will be issued in an International Standards Organization (ISO) format so companies that wish to use it may incorporate the document into an ISO 22000-based food safety management system.
- ◆ Could be: 1) used as an educational tool; 2) serve as a stand-alone set of prerequisite programs by companies involved in the manufacture of feed and feed ingredients; 3) used as prerequisite programs coupled with a HACCP-based food safety management system (such as ISO 22000) to meet anticipated new governmental regulatory requirements; 4) used by commercial animal food and feed manufacturers as a requirement for ingredient suppliers or as the basis for supplier audits; and 5) incorporated as part of requirements for third-party inspections.

Once comments are submitted, each will be reviewed by a steering committee comprised of experts from the four companies, as well as FAO, Agricultural Industries Confederation (a UK-based animal supply trade association extensively involved in the animal feed industry) and LRQA Global (an international entity active in the development of food safety standards). Both the Agriculture Industries Confederation and LRQA Global are active members of the Global Food Safety Initiative's (GFSI) Technical Committee.

The NGFAs' Feed Legislative and Regulatory Affairs Committee, and Feed Manufacturing and Technology Committee, will take the lead in developing the Association's feedback on the draft document. The NGFA also will inform members when the draft document is available for review and comment so that member companies can provide input, as well.

