



FDA Considering Targeted SRM Removal in Proposed BSE-Prevention Feed Rule

It appears that the Food and Drug Administration is planning to propose a more targeted removal of so-called “specified risk materials” (SRMs) from all animal feed as the centerpiece of changes to its feed regulations designed to prevent the establishment or spread of bovine spongiform encephalopathy (BSE).

It is clear that FDA is planning to propose some form of action to remove SRMs from all animal feed. But during two separate presentations within a week – one of which was at the NGFA’s Feed Industry Council Conference on Jan. 22 in Memphis, Tenn. – FDA officials provided data showing that the vast majority of potential BSE infectivity would be eliminated by a targeted SRM ban limited to brain and spinal cord of cattle 30 months or older, plus restrictions on the use of dead stock in animal feed. Based upon the 7.1 million cattle 30 months or older that are slaughtered annually in the United States, FDA’s theoretical worst-case assumption is that an estimated 49.7 billion of a total 55.117 billion infectious doses of potential BSE infectivity (known as ID_{50s}) would be eliminated from the feed chain by banning the use of brain and spinal cord from cattle 30 months or older.

In addition, FDA’s presentations stressed the infrastructure challenges posed by a full SRM removal, which would include the vertebral column and the small intestine. FDA estimated that a full SRM ban from slaughter cattle 30 months and older, as well as dead stock, would generate an estimated 2.1 billion pounds of waste material annually that would be need to be disposed of or redirected to industrial uses.

During their presentations, FDA officials also were clear that either a targeted or full SRM removal would reduce the need to impose other animal feed controls, such as the agency’s previously articulated concepts of requiring dedicated facilities and manufacturing lines, and prohibiting the feeding of restaurant plate waste and poultry litter.

There are indications FDA is striving to publish the proposed rule in the *Federal Register* within the next month. The NGFA understands that the proposed rule, being developed by FDA’s Center for Veterinary Medicine (FDA/CVM), currently is at FDA’s Office of Legal Counsel for

review. FDA/CVM earlier this week responded to several questions posed by FDA’s Office of Legal Counsel concerning the economic and environmental impact study that accompanies the proposed regulations. It is expected that FDA will provide a 60- to 90-day comment period once the proposal is issued.

In an advance notice of proposed rulemaking issued on July 14, FDA posed more than 30 questions concerning potentially significant changes to its BSE-prevention feed rule. Most focused on what the agency described as its intent to propose a ban on the feeding of SRMs in all animal feed to enhance existing BSE-prevention safeguards. At that time, FDA said it was considering defining as SRMs the same list as previously prohibited from being used as human food by USDA, namely: the skull, brain, trigeminal ganglia, eyes, vertebral column, spinal cord and dorsal root ganglia (nerves attached to the spinal cord) of cattle 30 months of age or older, as well as the distal ileum portion of the small intestine and tonsils of all cattle. FDA also posed a number of questions on whether other policy responses – including requiring dedicated facilities and equipment, and prohibiting the feeding of poultry litter and plate waste to ruminants – would be necessary if an SRM ban was imposed.

FDA Plans to Increase Inspections for BSE-Prevention Feed Rule Compliance in 2005: In a related development, FDA/CVM is on track to increase the number of inspections conducted to verify compliance with its BSE-prevention feed rule in fiscal year 2005, which began Oct. 1, 2004. FDA envisions conducting approximately 10,000 inspections, with most of those – 6,300 – being done by state feed control agencies operating under contracts with FDA. That compares to 6,600 total inspections that the agency planned to conduct in fiscal 2004. As part of its expanded inspections, FDA/CVM said it intends to conduct targeted inspection programs to better assess the compliance of transporters and on-farm mixer-feeders.

Thus far, more than 33,000 inspections have been conducted since FDA issued its BSE-prevention feed regulations in 1997. Those inspections cover 14,853 individual firms. Of those, 3,444 firms – or 23 percent of the total – handle prohibited mammalian material. But only a fraction of those also manufacture ruminant feed, FDA said.



Senators Introduce Bill to Delay Imports of Canadian Beef

At least four senators today joined in introducing legislation that would delay the importation of beef and beef byproducts from Canadian cattle 30 months or older.

The bill was announced by Sen. Craig Thomas, R-Wyo., during a hearing conducted by the Senate Agriculture Committee on the U.S. Department of Agriculture's final rule classifying Canada as a minimal-risk nation for bovine spongiform encephalopathy (BSE) and permitting the import, effective March 7, of live Canadian cattle younger than 30 months and beef from Canadian cattle of any age.

Thomas was joined in introducing the measure by Sens. Conrad Burns, R-Mont., John Thune, R-S.D., and Chuck Hagel, R-Neb. Thomas, while not offering specifics on the bill's provisions, expressed concern that USDA's final rule bans the importation of live Canadian cattle 30 months or older while at the same time allowing the beef from those cows to be slaughtered, processed and packaged in Canada and then exported to the United States. "Whether the beef is boxed or alive, it needs to be addressed in a uniform way and we need to deal with both issues at the same time," said Sen. Hagel in a statement issued tonight.

New Secretary of Agriculture Mike Johanns said the final reports of two U.S. technical teams dispatched to Canada following its two most recent BSE cases "will be critical as we consider whether any adjustments to current policies are warranted." Johanns said the final report is due by mid-February from the technical team that is focusing on the efficacy of Canada's feed restrictions that prohibit the use of certain mammalian materials in ruminant feed. But the final report of the technical team focusing on the epidemiological investigation of the two most recent Canadian BSE cases likely will not be completed until late March, he said.

Meanwhile, Johanns faced many hostile questions from senators of both parties over USDA's final rule, particularly the provision that would allow beef and beef products from Canadian cattle older than 30 months to be imported, but not the live cattle themselves. Several senators said that disparity would put U.S. slaughterhouses at a competitive disadvantage. Johanns responded that he was willing to reconsider that part of the rule. But Dr. Ron DeHaven, administrator of USDA's Animal and Plant Health Inspection Service, said USDA would need to assess the risks of permitting imports of live Canadian cattle 30 months or older, and declined to predict how long it would take to complete such a risk analysis.

In his prepared testimony, Johanns said USDA's actions with respect to BSE are "potentially precedent-setting, and could affect international trade patterns for years to

come, with important economic implications for our cattle producers and the entire cattle industry." He termed preparation of USDA's final rule as being "transparent, deliberative and science-based."

Noting that USDA's final rule has been challenged in court, Johanns said USDA had adhered to World Animal Health Organization (OIE) guidelines and recommendations from the Harvard Center for Risk Analysis to protect human and animal health. But that assertion was contested by Sen. Tom Harkin, D-Iowa, who maintained that OIE guidelines call for the implementation of BSE-prevention feed regulations and active surveillance for eight years – rather than the seven years in Canada's case – before a country is considered to be minimal risk for BSE. Harkin's statement, in turn, was challenged by APHIS Administrator DeHaven, who noted that the OIE guidelines are not prescriptive, but rather a form a series of redundancies in BSE-prevention steps that can be implemented by countries.

The continued impasse with Japan on resuming imports of U.S. beef products also resurfaced during the hearing. Johanns responded by reassuring senators that the issue was being pursued across all federal government and political levels, including discussions between President Bush and Prime Minister Koizumi. Johanns expressed confidence that progress was being made, but that the constant pressure on Japan would not let up until its market is reopened to U.S. beef.

But the most vitriolic comments came from Sen. Mark Dayton, D-Minn., who labeled as "stupid, ignorant and offensive" those at USDA who believe the Canadian border reopening rule is wise policy and that its economic impact on the U.S. cattle industry will be moderate. At another point, he termed the USDA rule "crazy, wrong and destructive."

"Welcome to the Senate Agriculture Committee, Mr. secretary," said Sen. Pat Roberts, R-Kan., immediately following Dayton's outburst. "It must be something in the water they drink up there."



Calendar

Feb. 15-16, 2005: NGFA Animal Agriculture Committee
NGFA Conference Room, Washington, D.C.

March 30-April 1, 2005: NGFA 109th Annual Convention
Hotel Del Coronado, San Diego, Calif.



Second Bush Administration Taking Shape

Fresh from the inauguration and the State of the Union address, President Bush's revamping of his cabinet is nearly complete.

Former Nebraska Governor Mike Johanns became the first new cabinet member to be sworn in, succeeding Ann Veneman as secretary of agriculture shortly after the Jan. 20 inaugural day address. Meanwhile, a battle is brewing for the deputy agriculture secretary slot between incumbent Jim Moseley and White House agriculture adviser Chuck Connor and others. USDA Chief of Staff Dale Moore has accepted an invitation to remain in his post. But numerous other undersecretary, assistant secretary and administrator slots within USDA are still in play.

President Bush also has not yet nominated a new U.S. trade representative (USTR) to replace outgoing Robert Zoellick, who has been nominated as deputy secretary of state under Condoleezza Rice. The Senate has not scheduled a confirmation hearing yet on Zoellick's nomination, as paperwork requirements continue to be finalized. Zoellick will remain as USTR until he is confirmed or a new USTR is nominated and confirmed. Principal speculation on a new USTR has focused on Josh Bolten, director of the Office of Management and Budget (OMB), Gary Edson, former deputy national security adviser responsible for international economic affairs, Commerce Under Secretary for Trade Grant Aldonas and deputy USTR for Asia Josette Shiner.

In addition to Johanns and Rice, Congress has confirmed new secretaries of education, interior, energy, commerce, veterans affairs, and health and human services. New Secretary of Health and Human Services Michael Leavitt was pressed during his confirmation hearing regarding a new permanent head of the Food and Drug Administration (FDA). There are indications that Acting FDA Commissioner Dr. Lester M. Crawford is President Bush's choice for the post. But his

nomination has been delayed by demands from Sen. Edward M. Kennedy, D-Mass., that Bush simultaneously announce the nomination of a medical doctor to be deputy commissioner. Kennedy is ranking member of the Senate Health, Education, Labor and Pensions Committee, which has oversight of FDA and is responsible for confirming FDA nominees.

Congressional Leaders/President Lay out Legislative Priorities: Republican leaders have begun to lay out their priorities for the 109th Congress, with Social Security reform topping the list of an aggressive agenda. The president outlined his proposal during the State of the Union address on Feb. 2, and Congress is certain to entertain numerous other reform schemes before any legislation will make its way through the process. Also at the top of the agenda is tax reform and completing an \$80 billion supplemental appropriation for the continuing efforts in Iraq and Afghanistan.

House Majority Leader Tom Delay, R-Texas, listed a group of "second-tier" initiatives also to be considered in the House. Included are trade bills, such as the Central American Free Trade Agreement (CAFTA), tort reform to lessen the burden of punitive damages on the economy, and associated health plans that would assist small businesses in providing health insurance for their employees. Also included are several significant holdovers from last year, such as the highway bill and a comprehensive energy bill.

Meanwhile, Senate Republican Leader Bill Frist, R-Tenn., outlined his priorities by assigning the first 10 bills to specific issues: Senate bill 1 (S. 1) is the Social Security Solvency and Protection Act, S. 2 is a bill to provide tax simplification and fairness, S. 3 is fighting the war on terror, S. 4 is the Healthy America Act of 2005 to improve health care access and quality and S. 5 is the Class Action Fairness Act. Also in the top 10 are bills to make the recently enacted tax cuts permanent and to provide for a comprehensive energy policy.

House Chairman Lays Out Timetable for Highway Bill

House Transportation and Infrastructure Committee Chairman Rep. Don Young, R-Alaska, has set a goal of having a new highway reauthorization bill ready for House floor consideration by the week of March 7.

Programs that administer funds for highway construction, public transportation and road safety have been operating under temporary extensions since the last law – known as TEA-21 – expired on Sept. 30, 2003. Young plans to introduce the new surface transportation bill during the first week of February, and House Speaker J. Dennis Hastert, R-Ill., has let it be known that he wants the bill passed by the House in March.

Lawmakers leading the reauthorization effort are striving to pass a bill authorizing about \$299 billion over six years, or an equivalent amount over five years. The Bush administration

had proposed a \$256 billion bill when it introduced its fiscal 2005 budget. But House Majority Leader Tom Delay, R-Texas, said that the White House has given indications that it will accept the \$299 billion level. A definitive answer is unlikely until the bill is proposed and on its way through Congress, given the administration's emphasis on reducing the federal budget deficit starting with its fiscal 2006 budget proposal scheduled to be released on Feb. 7.

In addition, Reps. Jerry Moran, R-Kan., and Collin Peterson, D-Minn., reintroduced NGFA-supported legislation on Feb. 2 that would codify the agricultural exemption to the U.S. Department of Transportation's hours-of-service truck driver rules. Plans are to attach the provision to the highway bill during House consideration of the measure.



Conference Examines Science, Risk of BSE in North America

The Harvard Center for Risk Analysis, whose state-of-the-art statistical model has been used to estimate the risk of bovine spongiform encephalopathy (BSE) in the United States, has determined that a "targeted" ban on removing brain and spinal cord from cattle 30 months or older – combined with a ban on dead stock – in all animal feed would reduce the theoretical potential spread of BSE by a level equivalent to a ban on all so-called specified risk materials (SRMs).

That was one of the highlights of a Jan. 27 conference organized by the National Cattlemen's Beef Association and American Meat Institute that brought together top scientists, government officials and industry representatives from the United States and Canada to assess the latest information concerning the science, risk and consumer/public perceptions surrounding BSE. The NGFA also co-sponsored the conference and served as a panelist and moderator during two of the conference sessions.

Dr. George Gray, executive director of the Harvard School for Public Health's Center for Risk Analysis, said that combined with a removal of dead cattle from the feed chain, a targeted SRM ban would reduce the **potential theoretical** risk of spreading BSE by 79 percent. FDA officials concurred that the vast majority of **potential** BSE infectivity would be eliminated by a targeted SRM ban, and reiterated the agency's commitment to move toward some form of SRM removal when it proposes changes to its BSE-prevention feed regulations. [See article on page 1.]

Dr. Gray reiterated that the risk of BSE in the United States is extremely low, and the disease gradually would be eliminated over 20 years with existing BSE-prevention feed controls. But he said that Harvard's mathematical model also found that **potential** misfeeding of prohibited mammalian material to cattle, particularly on-farm, represents the single biggest unknown risk of spreading BSE in North America. The extent to which this may occur is unknown. But it was noted that alleged misfeeding would be a difficult practice to determine through inspections, given the number of on-farm facilities to be inspected, the changing economics that drive least-cost feed formulations, and the potential for accidental on-farm mix-ups.

The next most significant risk factor cited by Harvard was the potential mislabeling of feed or feed ingredients that contain mammalian material prohibited from being fed to cattle or other ruminants, which then might be misfed to cattle. Conversely, Harvard found that the cross-contamination of prohibited with non-prohibited mammalian material poses a negligible risk factor in spreading BSE in North America, given the implementation of existing BSE-prevention feed controls in 1997. However, Dr. Gray said that Harvard's most recent mathematical modeling

factoring in more recent FDA inspection results found that potential mislabeling and cross-contamination risks have declined significantly from 2003 estimates.

Meanwhile, Canadian Food Inspection Agency officials said that based upon the results of the agency's epidemiological investigation, it appears that all cases of BSE detected thus far in North America came from one geographic "cluster." Further, they said, each case was attributable to feed containing BSE-contaminated meat-and-bone meal produced prior to the imposition of feed controls in 1997 from some of the 184 cattle imported from the United Kingdom in the late 1980s and early 1990s. Fifty-two of those imported British cattle were located in Alberta, with another four residing in neighboring Saskatchewan. CFIA officials said this "cluster effect" likely has impeded the geographic spread of BSE in Canada and the United States.

Meanwhile, CFIA officials said that compliance with Canada's BSE-prevention feed regulations is roughly equivalent to the U.S. experience. Based upon the most recent data, approximately 95 percent of Canadian firms are in full compliance with its BSE-prevention regulations, CFIA said. Most of the remaining 5 percent of firms had minor technical violations that were easily corrected, it said.

FDA Sets Public Meeting on Animal Feed Safety System

The NGFA has learned that the Food and Drug Administration's Center for Veterinary Medicine (FDA/CVM) will conduct the next public meeting on its animal feed safety system initiative on April 5-6 in Omaha, Neb.

A *Federal Register* notice formally announcing the meeting is scheduled to be published. During the public meeting, FDA is scheduled to discuss its latest thinking about elements that should be included in a comprehensive and risk-based animal feed safety system that encompasses the manufacturing, distribution and use of feed and feed ingredients, including on-farm. FDA/CVM has formed an internal working group that consists of federal and state officials to further develop the initiative following its launch at a September 2003 public meeting. The agency's approach would identify and assess various biological, chemical and physical hazards that may be present in animal feed, as well as the likelihood that such hazards would pose a risk to human or animal health.

The NGFA has provided significant written input to FDA/CVM in its development of the animal feed safety system initiative, and will be an active participant in the April public meeting.





Canada Proposes to Amend Import Regulations Allowing Expanded Access for U.S. Cattle, Beef Imports

The Canadian Food Inspection Agency (CFIA) on Jan. 31 issued proposed regulations that would permit the importation of U.S. live cattle born in 1998 or later for any purpose, as well as beef or beef products from animals of any age from which specified risk materials (SRMs) have been removed.

Current CFIA regulations allow U.S. cattle of all ages to be imported, but only for slaughter. The CFIA proposal defines SRMs as the skull, brain, spinal cord, trigeminal ganglia, eyes and dorsal root ganglia of cattle 30 months or older, as well as the distal ileum and tonsils of cattle of all ages. CFIA said the proposal also would allow imports of younger cattle and live goats and sheep, which previously were prohibited. CFIA also is proposing to allow for year-round access for U.S. feeder cattle destined for Canadian feedlots for eventual slaughter. Restrictions imposed on U.S. feeder cattle imports over alleged health concerns over bluetongue and anaplasmosis have been a sore point in U.S.-Canada trade relations for several years.

Canada's current import restriction regulations, scheduled to expire on March 31, prohibit imports of live cattle, sheep,

goats, bison and water buffalo from the United States – except for slaughter – as well as meat or meat products from cattle, bison and water buffalo 30 months of age or older and meat from sheep and goats 12 months or older. Likewise, U.S. animal feed containing ingredients derived from such species are prohibited from being imported. So is fertilizer containing ingredients from such animals. CFIA said its new proposal would broaden these animal feed and fertilizer prohibitions to apply to ingredients and feed containing material derived from ruminants. Exempt under Canada's current regulations are U.S. feeder calves and pet food containing ingredients from such species, provided SRMs have been removed.

CFIA said its proposed rule, which is open for public comment through March 1, "further aligns Canada's BSE-specific policy for imports from the United States with science-based international guidelines for safe trade" as established by the World Animal Health Organization (known by its French acronym "OIE"). CFIA is proposing that the regulations stay in place until June 30, 2006. CFIA said it also is developing a broader BSE-related import policy that would apply to any country that has detected the disease.

EPA Announces Air Quality Compliance Agreement for Animal Feeders

The Environmental Protection Agency (EPA) on Jan. 31 published a final rule offering to enter into air quality compliance agreements to address emissions from animal feeding operations.

Under the voluntary program, animal feeding operations that agree to enter into the consent agreement with EPA will pay a civil penalty ranging from \$200 to \$100,000 based upon the size and number of farms in their operation, and will contribute to a fund to finance a two-year emissions monitoring program.

EPA intends to utilize an independent organization to conduct emissions testing over a two-year period on approximately 28 farms that are representative of animal feeding operations, both by geography and species (particularly swine, dairy and poultry operations). The emissions monitoring results are to be used by EPA to develop estimates of emissions from different types and sizes of animal feeding operations that will be used as the basis for permits required under the Clean Air Act, Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and Environmental Planning and Community Right-to-Know Act (EPCRA) requirements. EPA said that animal feeding

operations that choose not to sign – or that sign and subsequently withdraw from – the compliance agreement will be subject to potential enforcement action for any violations of federal environmental laws. Further, participating animal feeding operations will not be sued by EPA for alleged past violations. But the agreement does not preclude EPA from taking action in the event of an imminent or substantial danger to public health or the environment.

EPA said it was pursuing the emissions consent agreement route because of the difficulty and time-consuming nature of conducting individual enforcement actions on animal feeding operations, attributable partly to the uncertainty regarding the emissions levels that may exist. "Moreover, even when EPA has reached a successful resolution of an enforcement case, only the facilities that are subject of the enforcement action were directly affected," the agency said. "Consequently, EPA believes that the air compliance agreement will be the quickest and most effective way to address the current uncertainty regarding emissions from animal feeding operations and to bring all participating animal feeding operations into compliance with all applicable regulatory requirements." For more information, contact Randy Gordon at the NGFA's office at 202-289-0873, or by e-mail at rgordon@ngfa.org.





USDA Announces 2005-Crop Loan Rates for Corn, Sorghum, Soybeans

National average and county loan rates for 2005 crops of corn, sorghum and soybeans were announced on Jan. 31 by the U.S. Department of Agriculture.

The new county loan rates continue what USDA termed "incremental adjustments" made following enactment of the 2002 farm law to reflect changes that have occurred in cropping and marketing patterns over the years in an effort to more closely reflect market values and to minimize distortions that create anomalies in posted county price values between state and county

lines. The 2005-crop national average loan rates, mandated under the 2002 farm law, were set at \$1.95 per bushel for corn and sorghum, and \$5 per bushel for soybeans. The individual loan rates by state and county are available now from USDA's Farm Service Agency web site at: <http://www.fsa.usda.gov/dafp/psd/loanRate.htm>.

The 2005-crop county loan rates for wheat, barley, oats and other oilseeds were announced on Dec. 2. The 2005 county loan rates for pulse crops are scheduled to be announced soon, USDA said.

USDA Biotech Advisory Committee to Meet Feb. 7-8

The secretary of agriculture's Advisory Committee on Biotechnology and 21st Century Agriculture is scheduled to meet Feb. 7-8 in Washington to finalize the sections of its draft report that address the proliferation of traceability and mandatory labeling regimes for biotechnology-derived products in foreign countries.

This section of the advisory committee's draft report also is to address the implications foreign countries'

traceability and mandatory labeling requirements will have, as well as what the industry is doing to address such requirements on export shipments to those countries. The meeting also is to consider other aspects of its wide-ranging report, including the impacts of agricultural biotechnology on U.S. agriculture and the U.S. Department of Agriculture over the next five to 10 years. NGFA First Vice Chairman Ron Olson, vice president of grain operations with General Mills Inc., Minneapolis, Minn., is one of the advisory committee members.

Inland Waterways Users Board to Meet on Feb. 24

The Inland Waterways Users Board, which advises the U.S. Army Corps of Engineers lock and dam construction and renovation projects, has scheduled its next meeting for Feb. 24 in Washington.

The advisory committee is scheduled to receive briefings on the status of both the funding for inland navigation projects and studies, as well as the Inland Waterways Trust Fund. The trust fund consists of barge

fuel taxes paid by the industry that are to be used to finance 50 percent of the cost of inland waterways construction and rehabilitation projects.

The advisory committee also is to establish its priorities for the 2006 fiscal year, which begins Oct. 1. For more information, contact NGFA Director of Technical Services Tom O'Connor at toconnor@ngfa.org.

FDA Establishes New Human Food Safety Education, Outreach Office

The Food and Drug Administration's Center for Food Safety and Applied Nutrition (CFSAN) has created a new Office of Food Safety, Defense and Outreach to consolidate its efforts on food safety and terrorism-prevention.

FDA/CFSAN addresses safety issues associated with human food (including grains and grain products in

commerce that may be consumed by humans), human pharmaceuticals and cosmetics. A separate FDA unit – the Center for Veterinary Medicine – has jurisdiction over animal feeds, pet food and animal drugs. FDA/CFSAN said its new office will be responsible for its education and information efforts associated with food safety, food defense and nutrition.





Exporters Reminded Phytosanitary Certificates Require Official Samples

The U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS), in a Jan. 31 e-mail, reminded its field offices of its policy requiring that phytosanitary certificates issued by the agency are to be based upon official samples.

Official samples are required to be obtained by either APHIS personnel or officials authorized by the agency, such as official grain inspectors operating under the authority of USDA's Grain Inspection, Packers and Stockyards Administration (GIPSA) or one of GIPSA's designated or delegated official agencies. APHIS also noted that phytosanitary certificates cannot be issued based upon laboratory analysis and/or inspection of an unofficial sample, including submitted samples. APHIS said that adhering to this policy "ensures shipment integrity and program credibility." Importantly, the APHIS e-mail stated that, "[APHIS] cannot negotiate the release of shipments that were based or certified on unofficial sampling."

APHIS made essentially the same statements during a

Jan. 25 meeting that addressed key issues related to official phytosanitary certification and which was hosted by the NGFA and North American Export Grain Association. Attending the session were representatives of the NGFA's Grain Grades and Weights Committee and NAEGA's Grades and Inspection Committee, as well as the American Soybean Association, U.S. Grains Council and U.S. Wheat Associates. Also attending were representatives of USDA's Foreign Agricultural Service and Federal Grain Inspection Service.

During the meeting, APHIS discussed the increasing demands being placed upon its certification system. In particular APHIS said it was concerned about requests for comprehensive and exhaustive statements on pests of concern, including weed seeds and plant pathogens. The clear inference is that an international phytosanitary system designed primarily to address insect infestation needs options to address growing expectations by many importing governments related to other pests of potential concern. The NGFA and NAEGA plan to provide input to APHIS on the matter after further deliberations.

EU Considers Feed Limits for Vomitoxin, Zearalenone, Ochratoxin A

The European Union has announced it is considering establishing new limits for vomitoxin (deoxynivalenol or DON), zearalenone and ochratoxin A in feed and cereal grains and cereal products used in feed.

The EU was scheduled to develop a proposal following a Jan. 26-27 meeting of the Animal Nutrition Section of its Standing Committee on Food Chain and Animal Health. The new maximum limits being considered for feed are distinct from those officially proposed by the EU for vomitoxin and zearalenone present in raw and processed agricultural commodities intended for human food. [See *NGFA Newsletter*, Jan. 19, page 7.]

The EU said it is considering establishing the following maximum limits for the presence of these contaminants in feed:

► **Vomitoxin:** 8 parts per million (p.p.m.) for cereal grains and cereal grain products used in feed. The EU said it "eventually" would consider establishing separate maximum limits for cereal grains and cereal grain products used as feed ("for example, 5 p.p.m. for cereals and 10 p.p.m. for cereal grain products"). For feed ingredients and complete feeds, the EU is considering a 5 p.p.m. maximum limit, with the exception of a 0.9 p.p.m. limit for swine and 2 p.p.m. limit for calves less than four months of age, lambs and young goats. By contrast, the U.S. Food and Drug Administration has established advisory levels of 5 p.p.m. for grain and grain

products for feeding to swine, so long as such materials do not exceed 20 percent of the ration; 10 p.p.m. for grain and grain byproducts for feeding to beef cattle and feedlot cattle older than four months, as well as for poultry, provided such materials do not exceed 50 percent of the ration; and 5 p.p.m. for grain and grain byproducts for feeding to all other species, not to exceed 40 percent of the ration.

► **Zearalenone:** 2 p.p.m. for cereals and cereal products used in feed. The EU said it "eventually" would consider setting separate maximum limits for cereals and cereal grain products used as feed ("for example 1 p.p.m. for cereals and 2 p.p.m. for cereal products). For feed ingredients and complete feeds, the EU is considering a 0.1 p.p.m. maximum limit for piglets and sows; a 0.25 p.p.m. limit for "fattening" pigs; and a 0.5 p.p.m. limit for calves, dairy cattle, sheep and goats. FDA has not established regulatory limits, action levels or advisory levels for zearalenone.

► **Ochratoxin A:** 0.5 p.p.m. for cereals and cereal products used as feed. The EU said it "eventually" would consider setting separate maximum limits for cereals and cereal gain products used in feed ("for example 0.25 p.p.m. for cereals and 0.5 p.p.m. for cereal products). For feed ingredients and complete feeds, the EU is considering a 0.05 p.p.m. maximum limit for swine; and a 0.1 p.p.m. limit for poultry. FDA has established no regulatory limits, action levels or advisory levels for ochratoxin A.



Membership Matters

by Todd Kemp
Director of Marketing/Treasurer

It's February – That Means February Frenzy!

It's known far and wide as an annual NGFA event – with the beginning of February comes the annual **February Frenzy!**

What's February Frenzy? For the uninitiated, February Frenzy is a concentrated 28-day period of membership recruiting each year. All NGFA members are asked to make new-member recruiting a special priority. Take a few minutes to call that prospective member you've been thinking about. Or take a few minutes to put on your thinking cap and figure out who to call!

Our membership program annually gains about half our new members between Jan. 1 and the start of the March convention, so it's a critically important time. And here is an incentive for all recruiters to get active: **St. Louis Get-Away!**

- ▶ *Airfare for two* to St. Louis, Mo.
- ▶ *A two-night weekend stay* at the **Hyatt Regency Union Station** – provided courtesy of the hotel, site of the NGFA's 2005 Country Elevator Council conference and trade show.

- ▶ *Dinner at "Eleven Eleven,"* St. Louis's hottest new restaurant – sponsored by **GATX Rail**, Chicago, Ill.
- ▶ *Two prime tickets* to a Cardinals' baseball game – sponsored by **Monsanto Co.**, St. Louis, Mo.

Every successful recruiter qualifies for entry for this Grand Prize. A drawing for the winner will be conducted at close of business on Monday, Feb. 28. That gives you almost four weeks to work on your prospects! The more you recruit, the more chances you have to win.

So join the *Frenzy*. Get yourself in the running for a great prize, and invest in the future of the NGFA. Watch this space for updates and for our Grand Prize winner!

Join the Network! Want to get serious about membership recruiting? Want to qualify for the St. Louis Get-Away and more great prizes at the San Diego convention? Here's your best bet: Sign up for the **NGFA Membership Network** to receive frequent e-mail communications on recruiting strategies, hot-button issues, prospective member listings and more. To join, send an e-mail to tkemp@ngfa.org saying "Sign me up for the Membership Network!" Thanks for your membership and support of the NGFA!



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TIME SENSITIVE

