FDA Amends, Reissues for Public Comment Key Sections of Four Major FSMA Proposed Rules, Including Feed and Pet Food

By Dave Fairfield, Vice President of Feed Services

The Food and Drug Administration (FDA) on Sept. 19 amended and reissued for additional public comment key sections of four originally proposed rules implementing major sections of the Food Safety Modernization Act (FSMA).

Included in FDA’s action were reissuance of its proposed rules for human food and animal feed and pet food that are of major importance to the grain handling, feed and feed manufacturing, and grain milling and processing industry. FDA is providing a 75-day comment period on the newly revised regulatory language, which will begin once the revisions are published in the Federal Register – scheduled to occur on Sept. 29.

“We are taking this action because the input we have received from public comments has led to significant changes in our current thinking on certain key provisions” of the proposed rules, the agency said.

Dr. Dan McChesney, director, of the Office of Surveillance and Compliance at FDA’s Center for Veterinary Medicine had previewed several of the changes during a presentation on Sept. 10 to the NGFA’s Board of Directors. Revising major aspects of the proposed rule and providing a second comment period align with NGFA’s strong recommendations made to FDA in response to its original proposed regulations.

FDA’s reissuance of sections of its previously proposed rule include its proposed current good manufacturing practice (CGMP), and hazard analysis and risk-based preventive control requirements for facilities that manufacture and distribute human food, animal feed and pet food – which encompass grain elevators; feed and feed ingredient manufacturing facilities; flour mills, oilseed processing plants, corn refining operations and other grain processing plants;
and ethanol facilities that distribute co-products, such as distillers grains, to the feed sector.

FDA also is reissuing for public comment sections of its originally proposed rules for: 1) foreign supplier verification for importers of ingredients or food for humans and animals; and 2) growing, harvesting, packing and holding (storage) of produce for human consumption.

Of importance to NGFA-member companies, FDA’s revisions to the proposed rule for human and animal food address several major issues, including:

- **Revised Definition of “Holding” (Storage):** FDA revised its definition of “holding” (storage) of raw agricultural commodities that applies to facilities that store food, including grain elevators that store grains and oilseeds.

  Significantly, FDA’s revisions incorporate language similar to that recommended by the NGFA that expands the definition to include “activities performed and incidental to storage of food (e.g., activities performed for the safe or effective storage of that food and activities performed as a practical necessity for the distribution of that food (such as blending of the same agricultural commodity…), but does not include activities that transform a raw agricultural commodity…into a processed food….Holding facilities could include warehouses, cold storage facilities, storage silos, grain elevators and liquid storage tanks.” This revised definition is important because the activities encompassed within the “holding” (storage) definition will determine whether and to what extent FDA’s final requirements exempt grain elevators and other facilities that store raw agricultural commodities. Further, the addition of the example of liquid storage tanks appears intended to include application of mineral oil or other approved agents for controlling grain dust.

  FDA’s original proposed rule defined “holding” so narrowly that any activity other than purely storing grain (such as screening, cleaning, conditioning and fumigating grain) would have negated the agency’s intended exemption for grain elevators from both the human and animal food proposed rule’s requirements to comply with CGMP, hazard analysis and preventive controls.

- **CGMPs for Animal Feed and Pet Food:** The agency has proposed a significant rewrite to the CGMP requirements that...
would apply to animal feed and pet food facilities. The CGMPs contained in the initially proposed FDA animal food rule essentially mirrored those that currently are established for human food, and as such were overly prescriptive and in several respects inappropriate for animal feed.

- **Scope of Preventive Controls:** FDA’s new proposal changes certain definitions associated with its preventive controls requirements in an attempt to better clarify to what extent the agency expects the proposed requirements to apply. For instance, the new proposed language for hazard analysis clarifies that the types of hazards identified should be “significant” and based upon the facility’s experience, illness data, scientific reports and other information on “reasonably foreseeable hazards.” FDA proposes that the hazard analysis include those that may be intentionally introduced for economic gain (e.g., the addition of melamine to wheat gluten as a form of economic adulteration).

- **Human Food Co-Products:** FDA’s amended proposal revises requirements for facilities that distribute co-products for use in animal feed and pet food that are generated from manufacturing human food products.

- **Product and Environmental Testing:** The agency’s amended proposal addresses product and environmental testing requirements for animal feed and pet food facilities. Such requirements were not part of the agency’s original proposed rule.

- **Domestic Supplier Verification Activities:** FDA’s amended proposal for human and animal food also contains a request for comments on when and how domestic supplier verification should be required for to ensure the safety of raw materials and ingredients used in human and animal feed and pet food received from domestic suppliers. The agency previously had proposed such requirements for U.S. importers of food, animal feed and pet food products received from foreign suppliers under its proposed rule for foreign supplier verification programs.

- **Definition of “Very Small Business”**: FDA is seeking additional comment on how to define within its rule a “very small business,” which would be subject to reduced and streamlined preventive control requirements. FDA’s initial proposal on how to define a “very small business” was based upon annual dollar sales of animal feed and/or pet food by a company. In particular, the
agency is interested in receiving comments on how the “very small business” definition should apply to facilities that distribute, but do not sell, animal feed to contract livestock and poultry growers.

- **Economically Motivated Adulteration:** As noted previously, the agency is including in its human and animal feed proposed rules new requirements associated with the potential for intentional adulteration of animal feed and pet food for economic benefit. The new provisions would require facilities to address within their written food safety plans the potential for “known or reasonably foreseeable” contaminants that may be added to a product to enhance its economic value.

**NGFA to Review Amended Proposed Rules, Provide Additional Comments to FDA:** Several NGFA committees, led by the Feed Legislative and Regulatory Affairs Committee, will be reviewing the amended proposed rules and working with NGFA Vice President of Feed Services David Fairfield to develop the NGFA’s comments. Members interested in providing input should contact Fairfield at dfairfield@ngfa.org.

In addition, NGFA will be preparing an extensive analysis of the amended proposed rules for the NGFA membership in the next few weeks.

**Senate Committee Approves Rail Legislation; NGFA Spearheads Letter Signed by 36 Other Ag Groups**

By Randy Gordon, President

The Senate Commerce, Science and Transportation Committee on Sept. 17 approved by voice vote rail legislation that would strengthen and improve the operation of the federal Surface Transportation Board (STB) and, among other things, give it new authority to investigate rail practices alleged to be unreasonable without having to wait for the filing of a formal complaint by a rail customer.

The legislation (S. 2777) would reauthorize the STB – the federal regulatory agency responsible for overseeing freight railroads – and authorize federal funding of its operations through fiscal year 2019. The bill was introduced by Sens. Jay Rockefeller, D-W.Va., and John Thune, R-S.D., who serve as the chairman and ranking member, respectively, of the Senate committee, which has jurisdiction over freight rail issues.
During the bill’s consideration, six senators echoed various concerns over the bill raised by railroads. Sen. Roy Blunt, R-Mo., was most specific, voicing concerns over how quickly the bill – it was introduced last week – was being considered by the committee, and whether it would have a negative impacts on rail investment (including the requirement for railroads to install positive train control safety technology). Sen. Claire McCaskill, R-Mo., said she shared some of the railroads’ concerns. Meanwhile, Sen. Dan Coats, R-Ind., while supporting advancement of the bill, associated himself with Blunt’s remarks, and said he wanted to dig into the issues further. Sens. Deb Fisher, R-Neb., and Kelly Ayotte, R-N.H., made similar remarks reflecting railroads’ positions.

Prior to the Senate committee’s consideration, the Association of American Railroads (AAR) issued a statement alleging that the bill would “harm freight railroads and the communities that depend on them” by imposing “onerous new requirements and controls…” that “could erode the ability of railroads to continue their record infrastructure investments.” The AAR concluded by stating, “The United States has the safest, most productive and efficient freight rail system in the world thanks in large measure to smart and balanced federal regulations that protect rail customers while allowing railroads to operate in the free market like other business. Interfering with this balanced system of rail regulation could shrink rail investment at a time when the nation needs railroads more than ever.”

**NGFA Spearheads Ag Letter to Senators:** To counter the railroads’ message, the NGFA authored and spearheaded a letter co-signed by 36 other national and state agricultural producer and agribusiness organizations commending Rockefeller and Thune for introducing and moving the bill through the committee.

The NGFA-authored letter noted how severe rail service disruptions and other challenges facing those in agriculture over the last year had brought the constructive role that the STB can play into sharp focus. The NGFA and other agricultural organizations in particular cited as a constructive step the bill’s provisions that would expressly authorize the STB to initiate an investigation of rail practices – except for rate complaints – on its own initiative, without having to wait for the filing of a formal complaint by a freight rail user or group of users.

The agricultural groups also highlighted the reforms viewed as important to increasing the effectiveness of the agency in providing regulatory oversight of freight railroads. The groups noted that the legislation would “make an important contribution…by strengthening the independence of the STB, improving how it functions (including allowing much-needed ongoing
dialogue amongst Board members); requiring more transparency concerning the status of its proceedings and the nature and disposition of complaints brought before the agency; and providing for a voluntary arbitration process for disputes involving unreasonable rail rates, unreasonable rail practices and compliance with rail carriers’ common-carrier service obligations – with binding outcomes if utilized – that also recognizes and provides for the existence of private-sector arbitration systems for resolving such disputes.”

The groups concluded by expressing their commitment to working with senators to secure eventual enactment of S. 2777. It is unlikely the bill will be considered on the Senate floor until a post-election session, at the earliest. And there are no plans by the House Transportation and Infrastructure Committee to consider such a bill unless and until the Senate acts.

**Background – What the Bill Would Do:** For rail shippers and receivers, one of the major improvements contained in the bill is the express authority it would provide to the STB to initiate investigations of rail practices – except for allegations involving unreasonable rail rates – without having to wait for the filing of a formal complaint by a freight rail user or group of users. Current law allows the STB to initiate an investigation only if it receives a formal complaint filed by one or more rail users, which many are reluctant to do given the time, cost and potential for retaliation.

Other important sections of the bill for rail users include provisions that would call on the STB to:

- Determine whether to issue a proposed rule on competitive switching as part of its ongoing proceeding (on which the NGFA is involved heavily).

- Review the methodology the agency uses to determine whether Class I railroads are revenue adequate. Such determinations are important, given the STB’s dual statutory mandate to protect rail shippers from high freight rates and other abusive actions by railroads, while also ensuring that rail carriers earn adequate revenues. Accordingly, once a railroad achieves revenue adequacy, there is less need for the agency to implement policies and rules, such as rate reasonableness rules that emphasize railroad revenues over shipper protections.

- Provide for a voluntary arbitration process for disputes involving alleged unreasonable rail rates, unreasonable rail practices and violations of rail carriers’ common-carrier service obligations – with binding outcomes if arbitration is utilized. This provision also expressly recognizes and provides for the existence of private-sector
arbitration systems – such as the one operated by the NGFA – for resolving such disputes.

- In addition, the bill would clarify and enhance the STB’s status as an independent agency, including a ban on any other department or agency requiring the STB to submit its budget estimates or requests, legislative recommendations, testimony or comments on legislation for review or clearance in advance of being submitted to Congress and the White House Office of Management and Budget. It also would:
  - Expand the current STB from three members to five.
  - Allow commissioners to discuss and collaborate on issues with one another without calling a public meeting, so long as at least three STB members and the agency’s general counsel were present. A summary containing the names of participants and the matters discussed at such meetings would need to be posted within two business days after such a meeting, unless it involved an ongoing STB proceeding. Currently, STB commissioners are not allowed to talk with one another unless they convene a public meeting.
  - Require that the STB compile and post quarterly on its website a list of formal and informal complaints it receives from rail users – and how they were resolved – while protecting the identity of the submitting party.
  - Require the STB to submit reports to the committees of jurisdiction in the House and Senate on the agency’s progress in addressing unfinished regulatory proceedings.

**Congressman Lee Terry to Provide Keynote Address at the Feed/Pet Food Joint Conference**

By Dave Fairfield, Vice President of Feed Services

**Congressman Lee Terry**, R-Neb., will provide the keynote address to the fifth annual Feed and Pet Food Joint Conference, slated Oct. 7-9 in Omaha, Neb., hosted by NGFA and the Pet Food Institute (PFI).
Terry, who serves on the House Energy and Commerce Committee, which oversees the U.S. Food and Drug Administration (FDA) and its regulation of animal feed and pet food, will address the more than 300 industry members expected to attend the conference.

The conference, which is the premier feed industry and pet food event, will take place at the downtown Hilton Omaha and kicks-off with Terry’s opening address at 4 p.m. on Wednesday, Oct. 7. A grand opening reception will follow from 5-7 p.m. in the conference’s exhibit hall. (Spaces still are available to exhibit, for more information see the Sponsorship Menu.)

The Joint Conference’s program will open Oct. 8 and focus on the top regulatory, customer, and market issues facing the animal feed and pet food sectors in the coming year. Among the topics to be addressed during the day-long program are:

- **FDA’s Feed and Pet Food Agenda for 2015**: Dan McChesney, director, Office of Surveillance and Compliance, FDA Center for Veterinary Medicine, will review the status of Food Safety Modernization Act (FSMA) rulemaking, as well as the agency’s wide-ranging regulatory and guidance initiatives planned in 2015 for the feed and pet food industries.

- **Sanitary Transportation of Food, Animal Feed and Pet Food Products**: Sharon Clark, senior vice president transportation and regulatory affairs at Perdue AgriBusiness LLC, will provide an overview of FDA’s proposed rule for sanitary transportation of food, animal feed and pet food products, and approaches that companies may wish to consider to ensure the safety of products during transport.

- **Top Policy Issues for Animal Feed and Pet Food**: David Fairfield, vice president of feed services, NGFA, and Peter Tabor, vice president of regulatory and international affairs, PFI, will offer their thoughts on the top policy issues important to animal feed and pet food companies.

- **Sustainability and Consumer Preferences – What's the Right Approach**: A panel of leading experts will share their views on what sustainability means, consumer perspectives and industry initiatives.

- **GMO Answers – Building Greater Consumer Acceptance of Biotechnology**: Cathy Enright, head of Food and Agriculture for Biotechnology Industry Organization (BIO) will discuss current issues
related to genetically modified organisms (GMOs) and ongoing activities to build greater consumer acceptance.

- **AAFCO Priorities for 2015 and Beyond:** Doug Lueders, president, Association of American Feed Control Officials (AAFCO) and feed program supervisor, Minnesota Department of Agriculture, will provide an update on the status of the AAFCO ingredient-approval process and other initiatives underway in the professional organization of state and federal regulators.


In addition, on Thursday morning, Oct. 9, a free FSMA workshop will be available for all conference attendees. The Acheson Group, a strategic consulting firm that provides the latest food/feed safety consulting insights related to operational-, brand-, and regulatory-risk management, will conduct the special session. During the workshop, Jennifer McEntire, vice president, and Anne Sherod, director of food safety, will offer practical suggestions on how animal feed and pet food manufacturers can begin preparing for anticipated new FDA requirements.

Program, registration and hotel reservation information is available on the [NGFA website](http://www.ngfa.org).

### Update on DICKEY-john GAC 2500-UGMA Moisture Meter

By Jess McCluer, Director of Safety and Regulatory Affairs

As previously reported, problems with the infrared temperature sensor on some moisture meters lead to inaccurate readings. As a result, DICKEY-john recently redesigned the system to add a “self-cleaning” feature.

The Grain Inspection, Packers and Stockyards Administration (GIPSA) on Sept. 18 announced that it has completed the required testing for the approval of the modifications to the [DICKEY-john GAC 2500-UGMA](http://www.ngfa.org).

The modification adds a self-cleaning feature, which includes a brush that will
be added to the instrument. In the “retrofitted” version, DICKEY-john is not using a new temperature sensor, which is from a previous model but has a flush lens rather than recessed. Instead, a brush will clean debris from the sensor.

DICKEY-john is working with GAC 2500-UGMA users to address whether users are interested in upgrading their current model or retaining the model they currently own. There is no requirement to upgrade for users within the Official system since the original GAC 2500-UGMA remains an approved model. However, GIPSA has announced that all of their DICKEY-john GAC 2500-UGMA's will be upgraded to the new model.

DICKEY-john estimates that once an instrument reaches the assembly facility in Auburn, Ill., it will take a week to complete the upgrade process.

For additional information, see frequently asked questions provided by DICKEY-john.

New Reporting Requirements for Severe Injuries; Updates List of Exempt Industries

By Jess McCluer, Director of Safety and Regulatory Affairs

In a recent announcement, the Occupational Safety and Health Administration (OSHA) stated new injury-and-illness record-keeping requirements will go into effect on Jan. 1, 2015.

Under the revised rule, employers will be required to notify OSHA of work-related fatalities within eight hours, and work-related in-patient hospitalizations, amputations or losses of an eye within 24 hours. Previously, OSHA's regulations required an employer to report only work-related fatalities and in-patient hospitalizations of three or more employees. Reporting single hospitalizations, amputations or loss of an eye was not required under the previous rule.

All employers covered by the Occupational Safety and Health Act, even those exempt from maintaining injury-and-illness records, are required to comply with OSHA's new severe injury-and-illness reporting requirements. To assist employers in fulfilling these requirements, OSHA is developing a website for employers to report incidents electronically, in addition to the phone-reporting options.
OSHA also has updated the list of industries that, due to relatively low occupational injury-and-illness rates, are exempt from the requirement routinely to keep injury-and-illness records. The previous list of exempt industries was based on the old Standard Industrial Classification code system, while the new rule uses the North American Industry Classification System to classify establishments by industry. The new list is based on updated injury-and-illness data from the Bureau of Labor Statistics. The new rule maintains the exemption for any employer with 10 or fewer employees, regardless of their industry classification, from the requirement to routinely keep records of non-severe worker injuries and illnesses.

For more information about the new rule, visit OSHA's website.

Grain Handling Safety Seminar
Slated Oct. 15 in Fresno

By Jess McCluer, Director of Safety and Regulatory Affairs

California Grain and Feed Association (CGFA) and NGFA have teamed up to provide members with a Regional Grain Handling Safety Seminar that provides the tools to successfully comply with federal and state regulations.

The day-long seminar is scheduled for Oct. 15 at the Fresno Hotel and Conference Center (Fresno, Calif.). For NGFA or CGFA members, the cost is $135 for the first registrant and $100 for each additional registrant from the same firm; non-members are $185. Fees cover educational materials, as well as breaks and lunch. Additional registration information is available online.

This seminar will include an update on the status of several federal and state Occupational Safety and Health Administration (OSHA) issues, an overview of key grain handling standard components, NGFA guidance documents, and the revised Federal OSHA hazard communication standard.

For additional information, see the flyer and registration form.
Senators Urge USTR to Step up Efforts on Resolving Biotechnology Issues with China

By Jared Hill, Director of Legislative Affairs

Sens. Debbie Stabenow, D-Mich., and Chuck Grassley, R-Iowa, are continuing to push U.S. Trade Representative (USTR) Michael Froman to keep his top trade negotiators focused on biotechnology approvals in China.

Stabenow and Grassley recently led an effort, joined by 17 other senators, in outlining the challenges for U.S. agriculture when biotechnology traits are approved in the United States but not in a key export market such as China. The senators on Sept. 8 sent a letter to Froman highlighting the most recent example of how the differences in biotechnology approvals can cause economic harm to U.S. agriculture – this time involving China’s rejection of shipments of U.S. dried distillers grains solubles (DDGS).

In July, China disallowed the import of U.S. DDGS if the shipment contains Syngenta Agrisure Viptera MIR 162, a biotechnology corn trait approved in the United States but not in China, which is the top foreign destination for U.S. DDGS, importing $1.6 billion in 2013. The senators are requesting that Froman work to achieve greater cooperation between the United States and China on trade issues that involve new crop technologies so that U.S. agriculture does not again face the sudden closure of a key export market.

This is not the first time Stabenow and Grassley have led the charge in encouraging USTR to raise the priority of resolving biotechnology-approval issues with China.

In May 2013, Stabenow and Grassley sent a letter to USTR and Secretary of Agriculture Tom Vilsack requesting that they increase engagement with other nations on biotechnology approvals, and noting the challenges caused by inconsistent biotechnology trait approvals.

NGFA continues to engage with other stakeholders, and through the U.S. Biotechnology Crops Alliance, in requesting the same high-level engagement from USTR on the issue of biotechnology approvals in China the senators are requesting.
NGFA Participates in Senate Biotechnology Briefing

By Jared Hill, Director of Legislative Affairs

Biotechnology in crop production continues to be a hot topic on Capitol Hill.

NGFA on Sept. 16 participated in a briefing hosted by the Senate Committee on Agriculture, Nutrition and Forestry that focused on agricultural biotechnology. The panelists were:

- Anthony Reed, senior director of government relations for ADM, on behalf of NGFA;
- Scott Kohne, North American Free Trade Agreement market acceptance manager for Bayer CropScience seeds unit, on behalf of Biotechnology Industry Organization;
- Autumn Veazey-Price, vice president of government relations for Land O’Lakes, on behalf of the National Council of Farmer Cooperatives; and
- Don Emly, vice president of regulatory affairs for Arcadia, representing the view of small biotechnology developers.

The briefing audience was comprised of policy staffers who advise their respective senators on agriculture, trade and biotechnology issues.

Panelists covered various issues surrounding agricultural biotechnology – including development of new traits, consumer concerns, the benefit of biotechnology in helping feed the world, and the regulatory challenges of getting biotechnology traits approved.

Much of Kohne's presentation focused on how long and expensive it can be to develop new biotech traits and obtain regulatory approval. He noted that from development to full commercialization, it takes on average 16 years and costs biotechnology companies tens, if not hundreds, of millions of dollars.

Reed’s comments focused on explaining how the United States handles grain and the various export channels. Reed also provided a perspective on the challenges the grain industry faces in managing trade flows if a biotech event that has not been approved for import by a foreign market becomes present in the general commodity stream and is rejected in an export shipment. He also reviewed the cost grain handlers and farmers incur if a foreign market closes due to an unapproved event. Further, he noted the current challenges the U.S. grain system is facing in China in light of the commercialization in the United States of two recent biotech events.
Finally, Reed and Kohne both provided background on what private industry is trying to accomplish – such as resolving differences on how biotech events are stewarded and commercialized – through the U.S. Biotech Crops Alliance.

The briefing was another step to educate Congress on agricultural biotechnology, and gave NGFA a platform to continue delivering its message of support for biotechnology – with responsible stewardship and commercialization of new biotech traits.

Profile: Feed Manufacturing and Technology

Editor’s note: NGFA relies heavily on its 18 active committees and councils to address significant issues related to public policy and industry business. As such, NGFA has launched a series of profiles looking at the committees, their priorities and leadership to keep members up-to-date on current issues. A new committee will be featured each month in the “Committee Corner” based on association priorities.

Committee Name: Feed Manufacturing and Technology

Committee Chairman: Matt Frederking, Ralco Animal Nutrition, Marshall, Minn.

NGFA Liaison: Dave Fairfield, Vice President of Feed Services

Committee Members: Below is a list of committee members as of Sept. 18:

- Jackie Bortnem, Strategic Operations Manager, Purina Animal Nutrition, Saint Paul, Minn.
- Gary DeLong, Vice President, Degart Global, Urbandale, Iowa
- Matt Frederking, Vice President, Ralco Nutrition, Regulatory Affairs, Marshall, Minn.
- Edwin Gallagher, Vice President/Manager Keyes Operation, A.L. Gilbert Co., Keyes, Calif.
- Todd Gearheart, Vice President Northwest Business Group, J.D. Heiskell & Co., Wendell, Idaho
- Scott Lovin, Vice President, Feed, Ag Partners, Albert City, Iowa
- Edward Milbank, President, Milbank Mills, Chillicothe, Mo.
- Jon Peterson, Operations Manager, CHS Nutrition, Corson, S.D.
Joe Poluka, Senior Director, Quality Assurance Internal Manufacturing Supply Chain, Land O’Lakes, Arden Hills, Minn.

Dan Puffer, Director of Operations, DakotaLand Feeds, Huron, S.D.

Rand Schafer, Co-Owner/General Manager, Lortscher Animal Nutrition, Bern, Kan.

Paul Stevenson, Sr. Risk Management Consultant, Nationwide Agribusiness, Weatherby Lake, Mo.

Peter Tabor, Vice President, Regulatory and International Affairs, Pet Food Institute, Washington, D.C.

In addition, Trey Arkoosh, assistant quality manager, Wilbur-Ellis Company, Vancouver, Wash., serves on the committee as an apprentice.

**Committee Purpose:** This committee addresses operations issues and technological developments important to feed manufacturing operations of commercial mills and integrators. Among other things, it evaluates the latest developments in quality, production and manufacturing technology; interacts with universities and other organizations; and provides education and communication to members.

**Major Current Committee Activities:** The committee currently is focusing on the following major issues:

- **Annual NGFA-PFI Feed and Pet Food Conference:** The NGFA and the Pet Food Institute collaborate on an annual Joint Feed/Pet Food Conference. The program is designed specifically for feed and pet food sectors and addresses pressing policy, regulatory and operations issues that companies face in today’s environment. This year’s conference is slated for Oct. 7-9, 2014 in Omaha, Neb. (For more information on the conference, see [ngfa.org/feedandpetfood](http://ngfa.org/feedandpetfood) and related article on page 7.)

- **Food Safety Modernization Act (FSMA):** The committee works with the Feed Legislative and Regulatory Affairs Committee to lead NGFA’s efforts in actively addressing FDA’s implementation of FSMA, which includes proposals establishing new requirements for current good manufacturing practice and preventive controls for manufacturers of animal feed, feed ingredients and pet food.

- **Food Safety Preventive Control Alliance:** FDA, in cooperation with the Illinois Institute of Technology’s Institute for Food Safety and Health, in December 2011 established the Food Safety
Preventive Controls Alliance to develop training and educational materials to assist food and feed companies in complying with the preventive controls regulations to be required under FMSA. Members of the Alliance are subject-matter experts from the industry, academia and regulatory agencies who have knowledge and experience in food/feed safety issues. The committee interacts actively with the Alliance to influence the content and structure of the FSMA training and educational materials.

- **NGFA Model Feed Quality Assurance Program:** The committee maintains the NGFA Model Feed Quality Assurance Program and is considering developing and incorporating additional guidance on the use of hazard analysis and preventive control approaches to feed quality and safety in response to FDA’s implementation of FSMA provisions.

- **Feed Industry Training/Certification Activities:** The committee interacts actively with universities and other organizations to influence the content and structure of feed safety training and certification initiatives.

- **NGFA Education/Training Initiatives:** The committee evaluates the training and educational needs of NGFA-member companies involved in animal feed and feed ingredient manufacturing, and makes recommendations concerning NGFA’s role in addressing identified needs.
The NGFA Board of Directors recently met in Washington, D.C., to discuss and receive updates on issues affecting the industry – such as biotechnology, transportation (waterways, rail, truck), combustible dust – and help set the direction for NGFA into 2015. In addition, the Board hit Capitol Hill for issue briefings with representatives from the House and Senate.

Sen. Chuck Grassley, R-Iowa, the fifth most senior member of the Senate and senior Republican on the Senate Judiciary Committee, provided a lively question and answer session for the NGFA.

NGFA Board of Directors Chairman Gary Beachner, Beachner Grain Inc, Parsons, Kan., (at the podium) introduced Rep. Michael Conaway, R-Texas, (center) potentially the next chairman of the House Agriculture Committee, who gave the Board his “behind the curtain” congressional insights.