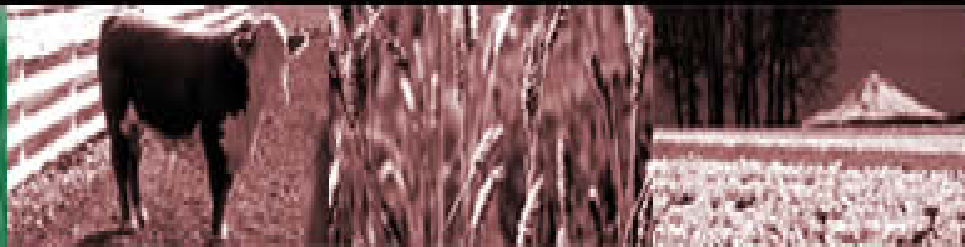




- Human Food By-Product Regulation

- Richard Ten Eyck, Feed Safety Specialist
  - Oregon Department of Agriculture





# Feed Safety Program Overview

- Enforcement basics:
  - Don't lie to the customer (633.055 Misbranding)
  - Don't Kill anything (633.045 adulteration)



# ODA Commercial Feed law

- **ORS 633.006 (4) “Commercial feed”** means any material that is distributed for use as feed, or as a feed ingredient for mixing in feed for animals, or any feed additive concentrate, feed additive supplement, feed additive premix, or premix,
- **Except:**



# Commercial Feed exemptions

- (a) Unmixed seeds, whole or processed, that are made directly from the entire seed and are not used to manufacture wild bird feed.
- (b) Hay, straw, stover, cobs, husks, screenings and hulls, when unground or unmixed with other materials.
- (c) Feed for dogs, cats, birds or fish maintained as household pets.
- (d) Silage, or materials containing at least 60 percent water.
- (e) Individual chemical compounds not mixed with other materials. This exemption, however, does not cover or extend to phosphate, urea or ammonium compounds that are recommended for animal feeding purposes.





# By-Products

- Defined ingredients have been reviewed for feeding safety by FDA
- Common names defined by AAFCO
- All are considered commercial feed in Oregon.



# Defined By-Products

- 60.96 Food processing waste
- 60.35 Sugar Food By-Product
- 60.93 Pasta Product
- 60.14 Cereal Food Fines
- 60.29 Gelatin By Products
- 60.34 Dried Beans
- 60.15 Dried Bakery Product
- 60.97 Restaurant Food waste
- 60.107 Mixed feed nuts
- 60.112 Apple Pomace
- **T40.100 Recovered Retail Food (newest)**



# By-Product -Oregon

- ODA has only exerted regulatory authority (registration, labeling) when the material has presented a hazard or become a commercial commodity
  - Dried Bakery Product is collected, mixed, dried and sold as a commodity
  - Food Processing waste has been found to sometimes contain restricted animal proteins and if so it is labeled and inspected to prevent disease amplification.
  - Recovered Retail Food is an emerging issue and will be a regulated material.
  - Generally human food firms can move their feed waste streams directly to a farm without regulatory intervention. \*





# By-Products -Federal

- \*FSMA will require that the feed waste stream be treated as animal feed. I.e. not adulterated or misbranded
- Human food firms will have to label the material as animal feed when it leaves the facility.
- Human food firms will have to keep trash, chemicals, and other contaminants out of the feed. This may require some new SOP's in the human food facility.







# By-Products

- **\*FSMA Implementation considerations**
- The holding and distribution CGMPs are intended to protect human food by-product for use as animal food from contamination. Some examples of potential contaminants include floor sweepings, gloves, trash, and cleaning chemicals and pesticides used in the facility. Whether touching a non-food-contact surface, such as the floor, is a failure to protect against contamination may depend on factors such as the condition of the non-food-contact surface, the animal food, and the intended animal species.



# Jo's Apple Surprise

Feed Free choice to beef cattle

- Guaranteed analysis:
  - Crude Protein 2% min
  - Crude Fat 1% min
  - Crude Fiber 4% max
- Ingredients: Apple Pomace
- Manufactured by:
  - Jo, (mail), city ,state, zip, phone
- Lot# (Load date on scale Ticket)
- Net Wt: (bulk)





Wilson says: "Let's Roll!"

Questions? [rteneyck@oda.state.or.us](mailto:rteneyck@oda.state.or.us)



# FDA Activity

- Animal Food cGMP's rules Implement 9/19/16 for large firms.
- Animal Food Preventive Controls Implement 9/18/17 for large firms.
- Human Food Preventive Controls implement 9/19/16 for large firms.



# FSMA Feed impacts

- GMP's for everyone
  - House Keeping
  - Production Documentation
  - Ingredient labeling
- PC inspections
  - Hazard Identification
  - Control Point validation / documentation



# FSMA Feed impacts

- PC inspections
  - Supplier Audits (if controlling hazard)
- Written Feed Safety plans
  - Trained individual(s)
- Based on Sales volume 2.5 Million
- Integrators: Farms -- or Mills-- ??

