



AAFCO

Association of American Feed Control Officials

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Board of Directors

Officers

Tim Darden
New Mexico Department of
Agriculture
President

Doug Lueders
Minnesota Department of
Agriculture
President-Elect

Robert Waltz
Office of Indiana State
Chemist
Past President

Ali Kashani
Washington State
Department of Agriculture
Secretary-Treasurer

Directors

Mark Leblanc
Louisiana Department of
Agriculture
Senior Director

Linda Morrison
Canadian Food Inspection
Agency
Junior Director

Richard Ten Eyck
Oregon Department of
Agriculture
Junior Director

Ken Bowers
Kansas Department of
Agriculture
Junior Director

Dan Danielson
Tennessee Department of
Agriculture
Junior Director

Docket Number: FDA-2013-N-0764-0001
Animal Feed Regulatory Program Standards

In 2011, the Food and Drug Administration (FDA) and the Association of American Feed Control Officials (AAFCO) entered into a partnership to develop the Animal Feed Regulatory Program Standards (AFRPS). These standards are designed to promote complementarity between state to state and state to federal program delivery, as well as, uniformity and consistency among feed regulatory programs across the U.S. This effort is consistent with the mandates of the Food Safety Modernization Act (FSMA) and with the fundamental goal of AAFCO to provide mechanisms for developing and implementing uniform statutes, regulations, and standards to enhance the protection of the nation's animal feed supply.

With the implementation of the AFRPS, a State program will have the ability to achieve and maintain programmatic improvements that help ensure the safety and integrity of the animal feed supply and be consistent in its regulatory approach and processes with other states and the federal government. As an active partner, AAFCO clearly supports the concept of the AFRPS.

To achieve national goals mandated by the FSMA, FDA must also objectively evaluate their delivery of feed control programs based on the eleven standards found in the AFRPS and provide complementarity. Such participation will further support the achievement of uniformity and consistency of all feed regulatory programs across the U.S.

The AFRPS is a voluntary program, therefore it is not mandated that states participate. However, to be effective, participation from as many states as possible is required. The FDA cannot assume that each state has the existing capacity and resources to conduct all activities found in the AFRPS. Identifying resources to fully participate in the attainment of performance levels indicated in the AFRPS will clearly be an issue for many state feed programs.

It is highly desired by many states that FDA provide funding for Pilot Programs to assist state feed programs to begin implementation and to thereby demonstrate strategies for implementation available to a national audience. To ensure sustainability, FDA should develop long term funding mechanisms for states to continue participation with the objectives of AFRPS, including the full or partial funding of ISO accreditations in state feed laboratories as inclusions in state cooperative agreements and similar fiscal vehicles.

The concepts nobly represented in AFPRS include at least the following overarching goals: to implement uniform and equitable standards, to adopt complementary inspection and sampling strategies, to accredit and share laboratory resources and ultimately, consistent enforcement of laws and regulations to enhance feed and food safety in an integrated food safety system. These objectives will require the strongest elements of trust, consensual science, and shared resources as states and the federal government bring together the varied strengths of local, state, and federal government to ensure a safe feed and food system. To completely achieve these goals, the FDA must consider its role as both a model and partner in the assessment and implementation features of the AFRPS for federal feed programs, and identify short and long term funding mechanisms for state programs to ensure complete participation and program sustainability into the future.

Respectfully submitted on behalf of the AAFCO Board of Directors



Tim Darden
2013 AAFCO President