

ENCLOSURE 3

Minutes of Meeting
between
FDA and National Oilseed Processors Association
December 3, 1998

Attendees:

FDA

Bert Mitchell
Carol Haley
Judy Gushee
Ron Scherzberg
Dan McChesney

NOPA

Larry Hendricks, ADM
David Ailor, NOPA
Cecil Wilcoxon, Townsend, Inc.
Ron Moeller, Cargill

NOPA requested the meeting to; explore whether a proposed HACCP rule for feed ingredients would apply to oilseed meals, and to provide FDA with insight into the oilseed meal process and the seeds considered as oilseeds.

NOPA represents processors of soybeans, safflower seeds, sunflower seeds, canola, and flax seeds. NOPA does not represent processors of peanuts, cottonseed, or corn germ. The total number of plants involved in processing all of the above commodities is approximately 110. Of these 110, NOPA represents approximately 65, and of these 65 approximately 55 are involved in the feed business. NOPA's customers, in approximate descending order, are; commercial feedmills, pet food manufacturers, integrated feedmills, and on-farm mixers.

NOPA inquired about the scope of the proposed HACCP rule and was told that it was not yet determined. NOPA expressed a desire that the rule be science based and not favor one segment of the industry over another. FDA assured NOPA that the rule would be science based and broad in scope. They questioned the need for mandatory HACCP given the fact there is no concern with the feed, and felt that mandatory HACCP could be very onerous. FDA cited salmonella data showing that all protein meals had a significantly higher prevalence of salmonella contamination than finished complete feeds. NOPA asked whether Salmonella was the basis for our doing this. We replied that both Salmonella and E. coli were the drivers. We said that there is a problem in feed and that we believe it is a good strategy to reduce contamination in feeds. They stated that they preferred the HACCP rule to include all segments of the feed industry, including feed mills, if we think HACCP is warranted.

NOPA asked whether we expect to publish the proposed rule next year and we said that was our goal.

NOPA inquired where a manufacturer's responsibility for product integrity ended under HACCP. FDA answered that in general, responsibility ends when the product changes

owners. For example, a manufacturer that used their trucks to deliver a product would be responsible for the product during transport, if the buyer supplied the trucks, the manufacturer's responsibility would end when the truck was loaded.

NOPA was asked about common transportation practices within vegetable meal processing industry. They indicated that they would research this and provide FDA's contractor for the HACCP the information.

The meeting ended with FDA encouraging NOPA to contact the contractor and provide input on their industry's manufacturing control processes and the industry's view on the products / industries which should be included in the proposed rule.