

**ENCLOSURE 4**

**FEED AND FEED INGREDIENT  
SAFETY AND QUALITY COALITION**

September 14, 1999

Dr. Stephen F. Sundlof  
Director  
Center for Veterinary Medicine  
7500 Standish Place  
Metro Park North 2, Room 482  
Rockville, MD 20855

Dear Dr. Sundlof:

The Feed and Feed Ingredient Safety and Quality Coalition is a broad-based coalition of associations representing the feed ingredient, feed manufacturing, and animal production industries. The Coalition's members are listed above, and a detailed description about each organization is attached. The Coalition is dedicated to producing safe, high-quality animal feed and recognizes that such feed is an essential element in maintaining and enhancing the safety and integrity of the American food supply.

The public comments of a number of Food and Drug Administration representatives have indicated that FDA is moving toward imposing hazard analysis and critical control points (HACCP) requirements on the feed and feed ingredient industries. While individual Coalition members have a range of views on HACCP, the consensus of the Coalition is that the underlying science base for mandatory HACCP requirements for the feed and feed ingredient industries does not exist today.

As we understand the Agency's plans, the principal objective of imposing HACCP requirements on the feed and feed ingredient industries is to achieve a "safe" (e.g., salmonella negative) feed/food stream. This would be accomplished by focusing on the control of microbiological hazards in the production of feed/feed ingredients.

However, even if "safe" feed/feed ingredients could be produced, there can be no assurance that the product would remain "safe", given the numerous opportunities for microbiological contamination to occur, both during transport and in the feed trough. Imposing mandatory HACCP requirements on the feed/feed ingredient industries but excluding the transportation sector and the feed trough, appears unjustified.

The Coalition would like to share its preliminary concerns with you and your staff and, at the same time, gain a better understanding of the Agency's thinking. We would like to discuss the following matters with the agency:

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1. The specific human food safety concerns that FDA hopes to address through mandatory HACCP requirements for animal feed and feed ingredients.
2. The available scientific testing and data that establish a risk to human health from feed and feed ingredients.
3. Whether FDA can establish that Salmonella is a human food hazard without first considering the serotype.
4. The available evidence that physical and chemical contaminants in animal feed pose a risk to human health.
5. The apparent FDA decision to adopt mandatory HACCP requirements for the animal feed and feed ingredients industries before it has imposed such requirements on the entire human food industry.
6. Whether the same requirements can -- or should -- be imposed on the feed ingredient, feed manufacturing, feed and feed ingredient transportation, and animal production industries.
7. Whether FDA intends to target specific feed ingredients.
8. Recontamination during transportation and feeding of "sterile" animal feed and feed ingredients.
9. The economic impact of mandatory HACCP requirements, including the impact on small businesses.
10. FDA's enforcement priorities if mandatory HACCP requirements are adopted.

We will contact you shortly to schedule a meeting at a mutually convenient time. During that meeting, we hope that industry and agency representatives will be able to have a meaningful dialogue on how best to achieve our common goal -- a safe and wholesome food supply.

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We appreciate your attention to this important matter, and look forward to meeting with you.

Sincerely yours,

American Feed Industry Association  
Corn Refiners Association  
Distillers Grains Technology Council  
National Cotton Council  
National Cottonseed Products Association  
National Grain & Feed Association  
National Oilseed Processors Association  
National Renderers Association

enclosure

xc (with enclosure): Dr. George "Bert" Mitchell (HFV-1)  
Dr. Linda Tollefson (HFC-200)  
Dr. George Graber (HFV-220)  
Dr. Dan McChesney (HFV-222)

## **FEED AND FEED INGREDIENT SAFETY AND QUALITY COALITION**

### **Coalition Member Descriptions**

#### **American Feed Industry Association**

The American Feed Industry Association (AFIA) is the national trade association for feed and pet food manufacturers, ingredient manufacturers and suppliers, equipment manufacturers and other firms which supply goods and services to the feed industry. AFIA's 700 corporate members manufacture 75% of the nation's primary, commercial feed. AFIA's membership also includes 35 ingredient and state/regional feed trade associations.

#### **Corn Refiners Association**

The Corn Refiners Association (CRA) is the national trade association representing the corn wet milling industry. Members of the Association produce starches, sweeteners, alcohol, feed ingredients and vegetable oil using the corn wet milling process.

#### **Distillers Grains Technology Council**

DGTC is a nonprofit corporation supported by dues from companies that are major producers of fuel and beverage ethanol and distillers grains. DGTC members produce over 50% of all distillers grains in the U.S., and these are primarily sold as an ingredient in dairy and beef cattle feeds.

#### **National Cotton Council**

The National Cotton Council (NCC) is the central organization of the U.S. cotton industry, representing producers, ginners, oilseed crushers, merchants, cooperatives, warehousemen, and textile manufacturers in 18 states. NCC represents over 20,000 cotton producers and over 1,000 gins that annually gin about 14 million bales of cotton. NCC's member firms annually handle about 5.0 million tons of cottonseed (for crushing and direct feed) in 12 states employing nearly 2,000 workers.

#### **National Cottonseed Products Association**

The National Cottonseed Products Association (NCPA) is a century old trade association representing the cottonseed processing industry. NCPA crusher members process cottonseed to produce cottonseed oil, cottonseed meal, linters and hulls. As well, they market whole cottonseed for animal feed. NCPA member firms handled approximately four million tons of seed in 1998, employing an estimated 1800 workers and generating an estimated \$1 billion in revenue.

### National Grain and Feed Association

The National Grain and Feed Association (NGFA) is the U.S.-based nonprofit trade association of about 1,000 grain, feed, processing and grain-related firms comprising 5,000 facilities that handle more than two-thirds of all U.S. grains and oilseeds. The NGFA's membership encompasses all sectors of the industry, including country, terminal and export elevators; feed mills; cash grain and feed merchants; end users of grain and grain products, including processors, flour millers, and livestock and poultry integrators; commodity futures brokers and commission merchants; and allied industries, such as railroads, barge lines, banks, grain exchanges, insurance companies, computer software firms, and engineering and design/construct companies. The NGFA also consists of 35 affiliated state and regional U.S. grain and feed associations, as well as two international affiliated associations.

### National Oilseed Processors Association

The National Oilseed Processors Association (NOPA) is a national trade association comprised of 14 regular and 22 associate member companies with plants that produce vegetable meals and oils from oilseeds. NOPA's 14 regular member firms process an estimated 1.4 billion bushels of oilseeds annually at 75 plants in 22 states, employing an estimated 4,500 workers.

### National Renderers Association

The National Renderers Association (NRA) is the international trade association for the industry that safely and efficiently recycles animal and poultry by-products into valuable products for the livestock, pet food, chemical and cosmetic industries. NRA represents its members' interests to regulatory and other government agencies, promotes greater use of rendered products, and fosters the opening and expansion of trade between North American exporters and foreign buyers.