



# thescoop

## HOW TO PREPARE FOR FSMA IMPLEMENTATION IN THE U.S.

By Lori Stevermer

The Food Safety Modernization Act (FSMA) helps ensure food safety by focusing on preventing contamination rather than simply responding to it. All feed manufacturers who manufacture, process, pack or hold animal food for consumption in the United States must comply with the FSMA.

In general, this includes those who register under Section 415 of the Federal Food, Drug, and Cosmetic Act (also known as the Bioterrorism Act). It's important to note that not complying is considered a prohibited act.

Recently, Hubbard Feeds hosted a series of meetings for its customers to help them prepare for the FSMA. Keith Epperson of Epperson Consulting & Associates, LLC, led the discussion by giving attendees an overview of the FSMA and how it affects their businesses. Below are the key takeaways from Keith's presentation.

Deadlines for larger businesses to comply with the FSMA went into effect in 2016. The current compliance date for many feed dealers is September 2017 for Current Good Manufacturing Practices. A more detailed outline of compliance dates is shown in the chart below, provided by the American Feed Industry Association.

Business Size	Subpart B Current Good Manufacturing Practice	Subpart C Hazard Analysis and Risk-Based Preventive Controls
All Others	Sept. 19, 2016	Sept. 18, 2017
Small Businesses (< 500 FTE) * *full time employees	Sept. 18, 2017	Sept. 17, 2018
Very Small Businesses (< \$2.5 million/year)	Sept. 17, 2018	Sept. 17, 2019

### Critical prevention efforts

The first of several topics discussed at the meetings was the importance of **training** employees on their job responsibilities. Having qualified individuals who understand what they do and the consequences of not performing those tasks correctly is a key aspect of food safety. Documenting when training sessions occur is an important part of FSMA compliance, because if it's not written down, it's assumed it didn't happen.

**Housekeeping and maintenance** of equipment and facilities was also discussed frequently. When inspectors walk through a facility, it's easy to see what type of housekeeping is being done. A regular maintenance schedule can prevent breakdowns or improper manufacturing and processing of feeds.

**Biosecurity** was another topic heavily emphasized throughout the meetings. Examples of this include documenting and visually inspecting incoming ingredient trailers to record what was on a previous load, trucking of finished feed, and even keeping brooms and equipment separate depending on where they are used.

*continued...*

# HOW TO PREPARE FOR FSMA (cont.)

## Planning ahead

Another aspect of the FSMA that feed manufacturers will be required to complete is a food safety plan. Every feed manufacturer must conduct a hazard analysis to identify and evaluate — based on experience, illness data, scientific reports and other information — known or reasonably foreseeable hazards for each type of animal food manufactured, processed, packed or held at their facility to determine whether there are any hazards requiring a preventive control. The hazard analysis must be written regardless of its outcome. Some examples of hazards in animal food are:

### Biological hazards:

- *Salmonella spp.*
- *Listeria monocytogenes*

### Chemical hazards:

- Mycotoxins
- Pesticides and process-related or industrial chemicals
- Drug carryover
- Nutrient deficiencies or toxicities

### Physical hazards:

- Stones
- Glass
- Metal

## Moving forward

The compliance date for small businesses with less than 500 full-time employees is Sept. 17, 2018, which gives feed manufacturers time to do their hazard analysis. The U.S. Food and Drug Administration (FDA) recently announced they will delay inspections for the hazard analysis and risk-based preventive controls portion of the FSMA until September of 2018. However, while the inspections may have been delayed, feed manufacturers will still be required to meet compliance deadlines.

The FDA has launched a food safety plan builder to help owners create a food safety plan for their businesses. You can find more information on the [FDA website](#). For Hubbard dealers that were unable to attend one of the FSMA training meetings, a binder and flash drive containing the information presented and various templates is available for \$200. Please contact your Hubbard Feed representative to find out how you can get this information.

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