How Policy and Regulatory Changes in the Feed Industry Will Affect Your Business

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Highlights of changes

• Already implemented
  • Health Canada’s policy related to the use of veterinary antimicrobials

• In the works
  • Feed ingredient classifications and approvals

• Future changes
  • Federal (Canadian Food Inspection Agency) regulations that govern the entire feed industry in Canada – both commercial and on-farm
  • FeedAssure® program update
Antimicrobials

• Health Canada policy change to address:
  • Domestic and global pressures related to antimicrobial use in animal agriculture
  • Threat of antimicrobial resistance

• December 1, 2018 move from over-the-counter antimicrobials to the Prescription Drug List

• Goal to decrease the use of antimicrobials, but at what cost?
  • Industry in need of tools to maintain animal welfare and profitability
Feed ingredients

• Pressure from industry to modernize policy approach for ingredient approvals and categorization
• Need for new and innovative products in the Canadian marketplace
  • Align with other jurisdictions to ensure global competitiveness
  • Enable feed industry and producers to meet government policy changes related to antimicrobial use
  • Help manage risks and challenges
• Timely access to new products including Canadian innovations
New categories for ingredients

• Gut modifiers
  • Mode of action in the gastrointestinal tract or gut
  • Replenishing intestinal flora, digestion and production/performance type claims allowed
  • Similar to Gut Flora Stabilizer category in the EU

• Salmonella control products in feed
  • Only allowed for control in the feed and not in the animal
New categories for ingredients (cont’d)

• Mycotoxin detoxifying agents
  • Substances or mixtures of substances incorporated into a feed matrix to mitigate the toxicity of known mycotoxins by reducing the animal’s exposure to the mycotoxins
    1. Directly bind to the mycotoxin either prior to ingestion or within the gastrointestinal tract
    2. Degrade the mycotoxin (e.g., microbial strains)
    3. Inactivate the mycotoxin itself (e.g., enzymes)
  • Challenge: not recognized at this time for products with toxins at levels that will affect animal performance or health although research shows positive effect
Overview of regulatory modernization

• Current *Feeds Regulations* date to 1983 – ANAC signaled need for change to CFIA in 2010 with the publication of a white paper: *The Case for Modernization of the Canadian Feed Regulations*

• Announcement made in 2011 by CFIA that the modernization of the *Feeds Regulations* would begin – anticipated 1-3 years to completion due to industry preparedness

• Creation of Feed Regulatory Steering Group which included producer groups (CPC), ANAC, CFIA and VDD

• 19 consultations completed to date

• July 2019 - Notice of intent for Gazette Part I (CGI) publication in winter 2020

• Expected CGI 2021 → *Feeds Regulations 2021*

• Transition timelines for compliance expected to vary (0-18 months) depending on activity (e.g. PCP, licensing, registrations, feed standards)
What’s new?

• Mandatory hazard identification and preventive control plans
• Incorporation by reference (claims, contaminants, nutrient maximums and guarantees)
• Change in ingredient approvals and product registrations
• Recognition of Veterinary Health Products for inclusion in feed
• Abolishment of Table 4
• Removal of customer formula feeds
Hazard identification and preventive control plans

Who?
• Commercial feed mills – any feed mill that sells feed, no matter the size
• On-farm feed mills that incorporate in their feed: drugs or other substances that present a risk of harm to human health, animal health or the environment

What?
1. Product and process control
2. Sanitation, biosecurity, and pest control
3. Hygiene, biosecurity, and employee training
4. Equipment design and maintenance
5. Physical structure and maintenance
6. Receiving, transportation, and storage
7. Recalls, complaints, and record keeping
Incorporation by reference

• Maximum contaminant levels
  • Biological
    • Aflatoxins
    • Deoxynivalenol
    • Fumonisins
    • Ergot alkaloids
    • Salmonella
  • Chemical
    • Dioxins, furans and PCBs
    • Metals and trace element contaminants

• Nutrient maximums
Ingredient approvals and product registrations

• Decrease the number of feed ingredients and feeds that require registration – low-risk products
  • Will allow resources to be applied to new product approvals

• Recognition of comparable jurisdictions (e.g. EU and US via FDA) – allow summary dossier for Canadian approval

• Consultation process added to signal what new products are coming to the market

• Allowance of permissible claims – not all claims will require registration
Veterinary Health Products

- Currently not available to the commercial feed industry – available to producers for top-dressing, in-water use and forceable administration
- Low-risk drugs in dosage form that are used to maintain or promote the health and welfare of animals – not for prevention or treatment of a disease
- Types of substances: vitamins, minerals, amino acids, yeasts and other micro-organisms
- Will give producers a new suite of health products for use in feed on the modernized regulations are completed
Changes for nutrient minimums and maximums

• No longer any minimum nutrient levels

• Maximum nutrient levels:
  • When there can be an impact to the health and safety of livestock, humans, or the environment
  • For feed purposes – cannot be therapeutic levels (Health Canada legislation)

• Producers will no longer be allowed to request higher levels of minerals and vitamins over CFIA’s maximum levels (removal of customer formula feeds)
Zinc

• Current Table 4 maximum = 500 mg/kg
  • Many formulas currently at 3,000 mg/kg for weaned piglets (customer formula feeds)
• CFIA original proposed maximum level in consultation was 1,000 mg/kg. Reduced to 150 mg/kg in consultation summary
  • Concerns around antibiotic and metal co-resistance
  • Concerns around use at therapeutic levels as opposed to feed purpose (control of diarrhea in weaned piglets due to E. coli)
• EU ban on use of zinc oxide in feed - June 2022
FeedAssure® program update

- Comprehensive feed safety management and HACCP certification program – 176 certified facilities
- Ensure it continues to be the gold standard for high level of feed safety in Canada - responsive to new industry threats
  - Biosecurity/bioterrorism/food fraud
  - Traceability
  - Management commitment
  - Risk assessment
  - Supplier approval
- Exceed regulatory requirements related to feed safety
Questions?