

CQA[®] and the New Medicated Feed Regulations

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The Canadian Quality Assurance Program (CQA[®]) was launched in 1998 as the Canadian swine industry's voluntary on-farm food safety program. Since that time, the nine member provinces of the Canadian Pork Council have delivered the program to over 10,000 hog farms. Over 7,000 of these have successfully completed the program's validation process and are registered CQA[®] farms.

The program itself is based upon the principles of HACCP and draws from the Canadian Food Inspection Agency's (CFIA) FSEP (Food Safety Enhancement Program) system for its structure. Canadian agricultural commodity groups rely upon these elements to create a strong scientific basis for their programs, 19 of which are under development or already implemented. Specifically, being "HACCP-based" means that one HACCP model has been developed to cover the entire industry rather than asking each participating producer to create their own HACCP model.

Recently, the CQA[®] program was fully reviewed and submitted to the CFIA's On-Farm Food Safety Recognition Program for technical review. The purpose of technical review is to ensure that on-farm food safety programs are technically sound, scientifically based and adhere to the principles of HACCP as laid out by the Codex Alimentarius. CQA[®] received its Letter of Completion for technical review in July 2004.

The review of the program entailed a thorough review and revision of the HACCP model as well as the program materials used by the producers and validators. From a feeding perspective, this included the removal of the sulfamethazine screening test previously required for all farms finishing pigs, and the addition of a feed-specific chapter to the Producer Manual. The creation of the feed chapter in the Producer Manual was intended to provide a greater range of information to producers related to handling both non-medicated and medicated feeds, and feed ingredients on their farm. The removal of the screening test was in response to changes in the swine industry which are resulting in feed grade sulfamethazine seen as less of a concern than at the time the program was launched, and is the first step in preparing for the introduction of new federal medicated feed regulations.

As of December 3, 2004, it is our understanding that the new medicated feed regulations will be sent back for Gazette I in the spring of 2005, and are targeted for Gazette II late in the year. The expected implementation date of the new regulations on farm is anticipated for November 2006.

All on-farm food safety programs are required to address both federal and provincial regulations within their framework. As such, we are currently examining our options related to the introduction of the new feed regulations.

The first step that we have made on this front is the creation of this new feed chapter in the CQA[®] Producer Manual. The Producer Manual is our tool for providing producers with the information that they need related to good production practices on their farm and regulatory issues that they need to be aware of in their operations. The feed chapter already contains references to the federal Feeds Act and Regulations as well as the Mammalian to Ruminant Feeding Ban amendments to the Health of Animals Regulations and will be modified as required in response to the approval and implementation of the new medicated feed regulations. Given our understanding of the proposed three-year implementation period for the regulations, it is our intention to begin to provide producers with information about the new regulations as soon as possible following their approval so that they can begin to prepare themselves to successfully meet the regulations when they come into effect for on-farm mixers.

The topic of licensing of on-farm medicated feed mixers and the CQA[®] program has been an item of on-going discussion since the proposed regulations were first circulated for comment. Since the on-farm food safety programs are required to address federal regulations, will they also be responsible for auditing the regulatory requirements? Will producers be prepared to accept the biosecurity risk associated with allowing a CFIA inspector onto their farm on a regular basis? What additional cost considerations will need to be considered on the inspection side of the regulations?

A current example from the program where a regulation is addressed is the Edible Residual Materials (ERMs) question of the CQA[®] On-Farm Quality Assessment Form. Producers who feed ERMs must have a permit from the CFIA in order to do so (as outlined in the regulations to the Health of Animals Act). Two questions are asked about this in the program; firstly, producers are asked if they are feeding edible residual materials; secondly, if they are feeding edible residual materials, do they have a permit to do so? In this case, the CQA[®] program has no responsibility to validate any of the regulatory requirements around this permit, though any observation of feeding products not permitted may result in refusal by the validator to recommend the producer for recognition and may trigger a full-validation of the production facilities if the producer is in a partial-validation year.

Producers mixing medicated feed at the time that the new regulations come into effect will be required to apply to the CFIA for their license. Documentation including, but not necessarily limited to, the mixer performance test, scale verification and end-product testing must be submitted to the CFIA as part of the application. An inspection including both document review and facility inspection

will be necessary in order for producers to obtain their license. Most of the proposed inspection form relates to the document review.

The on-farm inspection part of this licensing process remains to be determined in detail. Potentially, the option exists for those producers taking part in an on-farm food safety program to have their on-farm auditors (validators in the case of CQA[®]) conduct the on-farm inspection as part of their regular program registration renewal process or a CFIA inspector may come to the facility to conduct the inspection. Commodity groups will need to negotiate with CFIA on procedures.

It is expected that if current on-farm auditors carry out the inspection as part of their on-farm food safety program duties, that these validations (audits) will take from one-half hour to one hour longer to conduct. If a CFIA inspector carries out the inspection, it is expected that the process would take longer.

Once a producer obtains his license, it is currently proposed that he would need to renew the license every three years and demonstrate on-going maintenance in the time between obtaining the license and re-application. For the pork industry, this timeline works well because we also have a three-year validation cycle. Of course, not all producers requiring this license will be in a full-validation year when the feed regulations come into effect.

Another consideration for CFIA and the livestock industry, in general, is that not all of the commodity groups will have a three-year timeline for their audit cycles and, as in the proposed government criteria document for the next phase of the on-farm food safety recognition program, some commodity groups may incorporate Producer Declarations as part of their audit cycle rather than have a full- or surveillance-audit every year. If Producer Declarations are used, no auditor would be scheduled to be on the farm in that year. As the CQA[®] program is currently designed, it is not necessary for validators to be on-farm during partial-validation years since these years of the cycle comprise only a document review. In practice, though, most producers and validators agree to an on-site visit to conduct the partial-validation. If on-farm auditors play a role in the inspection of facilities applying for a license or facilities demonstrating their on-going maintenance of activities related to their license, it will require an on-farm visit by the auditor every year; another cost consideration for producers, industry and government.

If on-farm food safety auditors do conduct this “inspection” task, they will need to be trained to do so and, as is the case with the CQA[®] registration of farms, will only be making a recommendation to the CFIA regarding whether a facility to be licensed. The final decision for licensing any medicated feed mixing facility will lie with the CFIA. In addition, random audits of the system will be carried out to ensure that all aspects of the licensing procedure are functioning properly.

We still have some work to do regarding these proposed feed regulations. The CFIA and affected commodity groups will need to meet to discuss options, procedures, timelines and responsibilities.

As a commodity group, we will need to gain a better understanding of the procedures to be put into place as they become finalized and evaluate the impact of these regulations on producers and validators for various inspection and licensing procedure options.

From a very basic perspective, the CQA[®] program itself will need to be reviewed to ensure that adequate information is being provided to producers regarding the regulations, their responsibilities and the licensing process. The On-Farm Quality Assessment Form may need to be revised to ask additional questions regarding protocols for receiving, storing, mixing and delivering medicated feed ingredients and medicated feeds. It may also be necessary to provide additional factsheets, training materials or even training sessions to producers to help them prepare for these new regulations.

Although there remain many questions surrounding the proposed medicated feed regulations, as an industry, we are prepared to work with CFIA and our industry members to identify the smoothest approach possible for the introduction of these regulations at the farm level.

References

Canadian Quality Assurance web site: <http://www.cqa-aqc.com>

Thompson, J. and Morrison, L., personal communication, December 3, 2004.