**ISSUES & INSIGHTS**

**FSMA Feed Rule**

**SITUATION**

FDA promotes animal health through its oversight of veterinary pharmaceuticals and animal feed sold in commerce. The FSMA animal feed rule (Current Good Manufacturing Practice and Hazard Analysis and Risk-Based Preventative Controls for Foods for Animals) and a complementary rule for foreign suppliers give strong new authority to FDA to ensure the safety of animal feed. But NPPC contends that FDA has exceeded its mandate by extending the feed rule to cover not just commercial animal feed but also the preparation by animal owners of non-medicated feed intended solely for their own animals. The animal feed rule does contain an exemption for livestock operations that meet the definition of “farm” from having to comply with the rule’s requirements. Contract grower operations, an important component of U.S. pork production, however, are specifically excluded from that definition. Pork producers who have a private feed mill to supply their contract growers will need to comply with the animal feed rule – to the same extent as commercial feed suppliers – even though they are only producing feed for animals they own. That places an undue and unwarranted burden on those producers, who pose no greater significant risk than producers who fall under the farm definition.

**NPPC POSITION**

*NPPC supports limiting the applicability of the animal feed rule in the Food Safety Modernization Act (FSMA) strictly to facilities and enterprises producing animal feed for sale in commerce. The production of animal feed by owners of animals for their animals whether that production occurs on a farm, as defined by the rule, or elsewhere should not be subject to the rule. U.S. pork producers are committed to providing safe, wholesome feed to their pigs.*

**FAST FACTS**

- Pork producers, like all animal owners, rely on the safety and wholesomeness of animal feeds and feed ingredients they purchase from domestic and foreign vendors
- Producers work closely with animal nutritionists and veterinarians to ensure that feed rations are appropriate to their individual production needs, and they carefully monitor feed to ensure it is helping to produce healthy pigs and, ultimately, safe and wholesome pork
- The Pork Quality Assurance (PQA) Plus program – originally developed to address concerns with violative drug residues – encompasses the entire pork production process, including feed preparation and delivery
- The U.S. Food and Drug Administration, through the FSMA, oversees the production and ensures the safety of feed sold in commerce. The recently implemented animal feed rule gives FDA broader authority over the production of feed

**NPPC CONTACTS**

Dr. Dan Kovich, Director, Science & Technology, kovichd@nppc.org

Danielle Sikes, Manager, Congressional Relations, sikesd@nppc.org (202) 247-3600