

Alpacas as Food Animals: A Vermont Perspective



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Issue



- Alpacas are being slaughtered in the northeast, and perhaps around the country, with increasing frequency
- There is a lack of regulatory, diagnostic and best management practices guidance to support this activity
- The lacking infrastructure has ramifications for all parties involved
 - State meat inspection programs
 - Accredited veterinarians
 - Camelid owners
 - Consuming public



Federal Background



- **Alpacas are not amenable to the FMIA/not exotic species; by default, they fall under the regulatory jurisdiction of FDA**
 - USDA is mandated by the FMIA to inspect domestic cattle, sheep, swine, goat, equine, ratites, guinea fowl, squab and domestic chicken, turkeys, ducks, and geese, and the meat products of those animals, slaughtered in federal establishments that are intended for distribution in commerce
 - Game animals and their products are not addressed under the FMIA and PPIA and, therefore, fall under the jurisdiction of the FDA and its statutory authority provided by the Federal Food, Drug, and Cosmetic Act (FFDCA). These non-amenable meats may be voluntarily inspected (fee for service) by USDA under the USDA Agricultural Marketing Act of 1946.
 - The FDA/Center for Food Safety and Applied Nutrition (FDA/CFSAN) is responsible for protecting consumers against impure, unsafe, and fraudulently labeled foods covered by the FFDCA and to assure consumers that foods are wholesome and produced under sanitary conditions.

Vermont Background



- Vermont's hobby camelid industry has decreased in size over time – result is an increased number of unwanted alpacas in the area
 - Alpaca rescues
 - Alpaca animal welfare concerns
 - Livestock auction markets
 - Internet sales
- Concurrently, some alpaca owners have explored food production opportunities as a method of recuperating costs associated with raising alpacas
 - Vermont has a thriving local-vore, value-added food production industry
 - Owners want to slaughter alpacas under inspection due to market demands even though not required by FMIA
 - VT Department of Health requires that product originate from an “approved source”, and state inspection allows establishment to qualify as such

Vermont Background



- Late 2013 – accredited veterinarian contacted VT Agency of Agriculture to inquire as to her ethical/professional responsibilities when working with owners who are interested in shipping alpacas to slaughter
- Multiple verbal, email, and telephone conversations were held with FDA (CFSAN; CVM Division of Compliance), FSIS, VT Congressional Delegation to ID gaps and discuss mechanisms for moving alpaca slaughter under regulatory oversight of USDA-FSIS:
 - Petition under the authority of 9CFR392 > create a voluntary inspection program under the Agricultural Marketing Act.
 - Petition for this meat to be included as an amenable species under the Federal Meat Inspection Act

Challenges



- No drug or vaccine is approved for use in alpacas. Administration of medications is considered to be an extra-label use and must conform to ELDU requirements. Veterinarians have significant responsibility under AMDUCA/Veterinary Feed Directive.
- There are no FDA-validated tissue residue tests available in the U.S. for use with alpacas.
- There are no established tolerances for any drug administered to alpacas, so any residue detection is considered illegal.

Challenges



- FARAD prefers to recommend medication withdrawal times on a case-by-case basis, as these recommendations may change based on the dosing or the individual circumstances and because there is very little to no data on the drugs in alpacas.
 - Better than nothing
 - Not a cost effective means of gathering data for consistent use
- The withdrawal times recommended are merely suggestions of minimum withdrawal times and should be extended if the animal receives higher than the listed dose or if it is severely systemically compromised.

Challenges



- Alpacas have not historically been considered food animals by owners, primary care/referral veterinarians (including universities), and industry organizations
 - Camelid industry is generally not comprised of traditional farmers
 - Veterinarians routinely disregard the concept of meat withhold times and prescribe medications that have long withdrawals (aminoglycosides) and prohibited drugs (quinolones)
 - Alpacas are routinely medicated
 - ✦ Antibiotics/anti-inflammatory medications as needed for illness
 - ✦ Ivermectin monthly for prevention of meningeal worm in the eastern US.
 - Owners often acquire medications from feed stores and the internet and administer outside of a valid V.C.P.R.

Challenges



- Websites and Facebook are often the main sources of information available to alpaca owners.
 - Craig's List – rescue alpacas that subsequently go to slaughter – no medical history/accountability
 - Fly-by-night meat withdrawal time “experts” willing to provide “assistance” for a fee
- Industry denial; unwillingness to consider paying for any residue testing that may be helpful.
- Value-added products
 - Custom exempt products are sometimes mixed with inspected product during processing and sold into commerce (custom exempt pork fat mixed with alpaca meat for sausage production). This may result in illegal movement of uninspected value-added product across state lines

Current Status

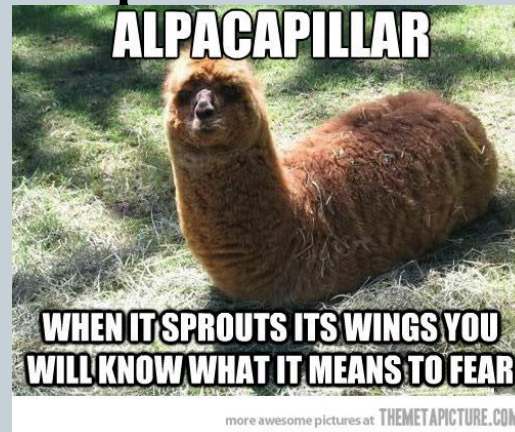


- **Vermont State Meat Inspection Program is currently offering inspection services for those interested in alpaca slaughter**
 - Fee for service payable by establishment requesting inspection(hourly inspection rate and portal to portal)
 - Carcasses stamped with the state exotic brand upon passing inspection
 - Product labeled with a pre-approved state label bearing all required features of an official label except that the exotic legend will be used to allow for interstate movement
 - Establishments must follow all SSOP (sanitation) procedures and document as if producing amenable product
 - Establishments are expected to follow good commercial practices as laid out in 21 USC 110 and general good manufacturing practices to produce products that are not contaminated or adulterated within the meaning of the State Meat and Poultry Inspection Act
 - Establishments are expected to follow their residue avoidance protocols to assure that products produced are not adulterated.
 - As a food producer of an FDA regulated product, establishments are required to register with the FDA

Vermont Concerns



- Adulterated food products entering commerce – public safety concern?
- Liability for state meat inspection program
- Liability for attending/referral veterinarian
- Public perception / bad press associated with lax practices



Next Steps?



- Education of/outreach to all sectors
- Data acquisition
- Petition to effect change
- Synchronization of messaging between FDA and USDA-FSIS
- Guidance offered to attending veterinarians
- Hold industry accountable
- USAHA resolution on this issue?



Questions?

