
RESOLUTION NUMBER: 10

Approved

SOURCE:

COMMITTEE ON FOOD AND FEED SAFETY

SUBJECT MATTER:

Clarification on Limitations to Government Feed Import Risk Mitigation

BACKGROUND INFORMATION:

In 2020, Resolution #3 and #12 (Feed Import Restrictions to Protect Against African Swine Fever Importation in Feed) was passed requesting that the United States Department of Agriculture (USDA), Animal Plant Health Inspection Service (APHIS), Veterinary Services to collaborate with other government agencies to restrict the import of feed/and or feed components from countries that are positive for African swine fever (ASF) to create enforceable standards with those countries to reduce contamination during harvest and processing. An interim response was received pointing out the Food and Drug Administration (FDA) was the point of contact, that the request included all feed ingredients rather than just soy and soy products, and that the secondary impacts were too prohibitive if all feed ingredients were banned from import, although supporting details were not given. The interim response supported volunteer programs rather than government-imposed programs, even though voluntary programs have no oversight. No final response has been posted on the United States Animal Health Association resolutions page as of September 2022.

Experimental studies on the ability of contaminated feed, particularly soy and soy products, to transmit diseases including *Senecavirus A* (SVA), porcine reproductive and respiratory syndrome virus, porcine epidemic diarrhea virus, pseudorabies virus, classical swine fever virus, ASF virus, foot-and-mouth disease virus (FMDV) have been done by Kansas State University, Cornell University, University of Minnesota, the USDA-Agricultural Research Service, Pipestone Applied Research, and others (Dee et al, 2014; Dee et al, 2018, Dee et al, 2021; Caserta et al, 2022; Dee et al, 2022; Stenfeldt et al, 2022). This work has been published broadly in peer-reviewed literature culminating in a special issue of feed risk in the January 2022 issue of *Transboundary and Emerging Diseases*. In this issue and in other recent published work it has been shown that time/temperature quarantine reduces risk of transmission from contaminated feed (Dee et al, 2022a) and contaminated feed causes widespread contamination of feed mills (Elijah et al, 2021). Finally, evidence of a SVA transmission into a previously negative country from contaminated feed was published (Dee et al, 2022b).

The risk of feed is well-recognized globally. The Canadian government undertook a collaborative effort to evaluate the cost and benefit of creating risk mitigation steps for feed imports and has since implemented a program to reduce risk from imported feed (Calvin et al, 2022). Denmark included a requirement in its Industry Products Standards to heat treat feed from ASF virus infected countries in Asia starting in July 2020 and they require import from only approved companies that are certified to meet quality standards (Agriculture and Food Sector, 2021). Australia defines imported animal feed as a high biosecurity risk on their Department of Agriculture, Fisheries and Forestry website, specifically highlighting the import risk to livestock as FMDV and poultry diseases. Australia also has guidelines for importing bulk grain from low risk areas and requirements on how the grain is grown, harvested, stored and transported (<https://www.agriculture.gov.au/biosecurity-trade/import/goods/plant-products/stockfeed-supplements>, Accessed August 31, 2022). The European Food Safety Agency Panel on Animal Health and Welfare has also recognized feed as risk for introduction and spread and that the risk was moderated by the source of the feed (2021). The USDA conducted a qualitative assessment and determined that feed risk ranged from negligible to moderate with high uncertainty (USDA APHIS VS CEAH, 2019). Another qualitative assessment determined the introduction of ASF via contaminated feed was moderate overall (Jones et al, 2020). Qualitative assessments are limited in their clarity and ability to assess risk designations, and quantitative measures are also limited due to varying methods of diagnostic analysis and limited laboratories testing feed (Shurson et al, 2022).

Mitigation of risk of foreign animal disease introduction requires engagement by both industry and government. To date, the US swine industry has acknowledged this threat and participated in research to evaluate feed risk, feed mitigants, and time/temperature controls. The feed import industry has also developed a responsible imports program; one example is SAM nutrition in Minneapolis, Minnesota. Efforts are also needed from the USDA and FDA like what is seen in Australia and Canada. The US government has not widely shared with members of the swine industry details about the challenges with managing risk to feed imports or what the costs would be; clarity is needed. This lack of understanding as to why action cannot be taken is despite industry participation in the Feed Risk Task Force, a letter sent to then Secretary Purdue from the National Pork Producers Council and 30 states, and the 2020 resolution.

RESOLUTION:

The United States Animal Health Association (USAHA) requests the United States Food and Drug Administration, the United States Department of Agriculture and United States Department of Homeland Security Customs and Border Protection provide a report to the USAHA Food and Feed Safety Committee by the 2023 USAHA meeting that includes a clear summary as to what industries and/or stakeholders would be impacted by a risk mitigation program on imported soy and soy products from countries that are positive for foot and mouth disease virus, classical swine fever virus, and African swine fever virus, and how those countries would be impacted. The report should also include an assessment of the impact of the Canadian, Danish, and Australian feed risk mitigation programs and identification of components that would mitigate risk for imports into the United States.

Assessments should include cost, benefits, and needs for implementation (resources, authority, etc). Comments on how the Foreign Supplier Verification Program could be leveraged to prevent adulteration of animal feed with pathogens as is done for human pathogens should also be included.

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