

REALLY SAVING YOU MONEY?

70th Annual Convention Virginia State Feed Association and "Cow" College February 17-19,2016 Mike Blair, Ph. D. Director, Global Antimicrobials Phibro Animal Health Corporation

TOPICS

- **■** What is an Alternative Feed Ingredient?
- **■** Alternative Feed Ingredients
- Determining true savings/costs
- Cost versus value
- Practical Evaluation of Alternative Feed Ingredients

What is an Alternative Feed Ingredient?

- 1. Criteria determined by the operation
- 2. Agri Stats definition Any ingredient which will replace corn, soybean meal or fat in the diet

Alternative Feed Ingredients

Primary Energy- Corn & Fats

• Wheat

• Milo - low tannin

Primary Protein/amino acids - Soybean Meal

Canola/Sunflower Meals

DDG's

- Expelled soybean meal
 Bakery Meals
 Meat and bone meal & animal protein
 blends
 Vegetable Protein Blends

Determining true savings/costs

- Savings per ton of feed x tons of feed = \$\$\$\$ savings
- Decision made
- **■** True Savings?

Determining true savings/costs

- Availability
 - How long will supply last?
 - Worth the effort? Do savings hold true?
 - Delivery dependable or variable?
 - Railroad demurrage costs
 Trucks 3rd Generation Trucking Rules
 Time of year summer *versus* winter
 Overtime costs to handle

 - Bird performance
 FSMA!

 - Veterinary Feed Directive (VFD)

Determining true savings/costs

- **■** Bin Space
 - Enough ingredient bin space to handle?
 - Will ingredient flow through system?
 - Does ingredient need to be ground? e.g. wheat replacing corn

Determining true savings/costs

- **■** Impact on production of final feeds
 - Effect on through-put?
 - Effect on pellet quality and thus bird performance?

Cost *versus* Value - CONSIDER THE VALUE CHAIN

- The Bird
- Feed Mill
- Feed Formulation
- People

Economic Validation by the Bird

- Ingredient must be priced to lower the feed cost per pound of meat/dozen eggs or increase yield which the birds will tell us. Strain and bird size needs to be considered
- Consistency and reliability of product performance will be key.
- Eliminate the "trader" mentality. Not all DDG's, animal proteins, grains the same!

Feed Mill

Can the ingredient be used in the feed mill? Every feed mill is different!

- Bin Space
- □ Receiving Issues/costs
- Hassle factor for the feed mill
 must be quantified via
 overtime, demurrage costs
 etc.

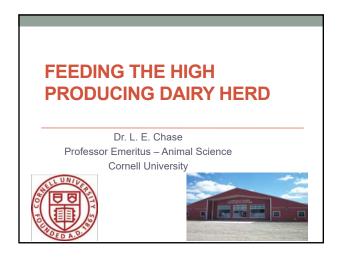
People

- · People business
- Purchasing, nutrition, feed mill and live production all need to work together to determine the value of alternative ingredients.
- Eliminate "silos" and "conflicting goals " and respect each other's positions.



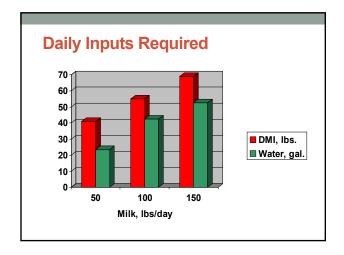


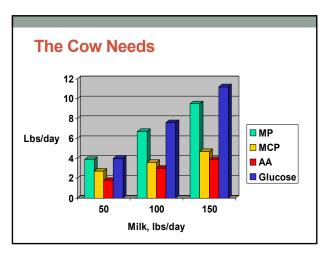


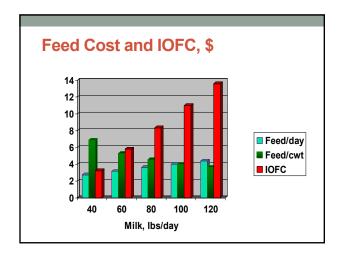


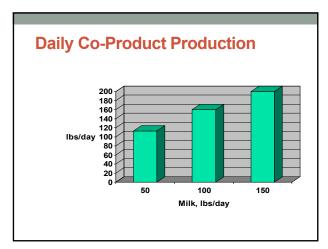
What is A High Producing Dairy Herd?

- How many are there?
- · What is the highest herd average?







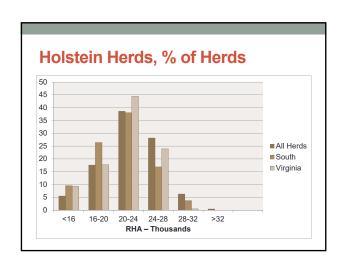


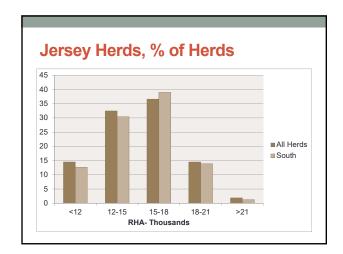
• Used the Dairy Metrics program to query the database. · Search criteria: - Holstein and Jersey herds. - Total herds and herds in the South. - Sorted by milk production groups. Goal – Define some herd parameters associated with milk

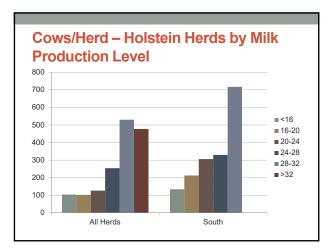
- production levels.
- · Holstein Herds:
 - All herds = 10,121

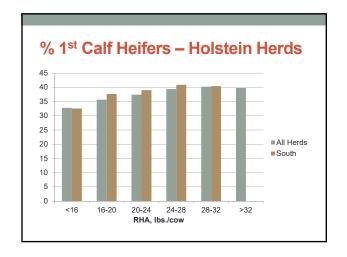
Raleigh DHI Data - 1/16

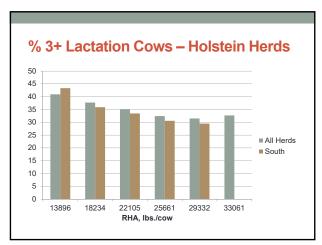
- South = 806 (Virginia = 259 herds)
- · Jersey Herds:
 - All herds 568 (Virginia = 9 herds)

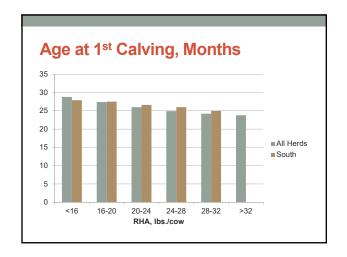


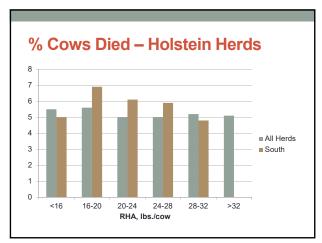


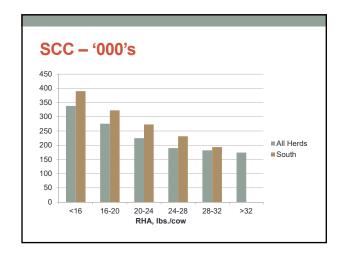


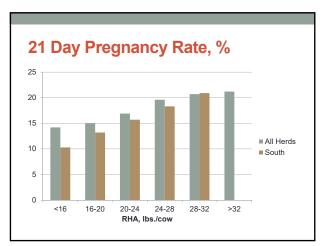












Interim Summary

- · Higher producing herds have:
- More 1st lactation heifers and less older cows.
- Lower age at calving for 1st calf heifers.
 - Similar number of cows that die.
 - Lower somatic cell counts.
 - Higher 21 day pregnancy rates.

Highest Herds

- · Holstein -
 - Highest is 35045 lbs./cow.
 - 44 herds > 32,000 lbs./cow.
 - South = 31,875 lbs./cow. (highest herd)
 - South = 30 herds >28,000 lbs./cow.
- · Jersey herds -
 - Highest herd is 22,638 lbs./cow.
 - 10 herds are > 21,000 lbs./cow.
 - Highest South herd is 21,067 lbs./cow.

Rations in High Producing Herds

- How do high producing herds get enough units of nutrients per day into the cows?
- A. Increase ration nutrient density?
- B. Increase DMI?

Ration Questions

- A large dairy sells a TMR to a neighboring small farm. Milk production on the large dairy is 78 lbs./cow/day while it is 86 lbs./cow/day on the small farm. How do you explain this?
- A high group of cows is averaging 120 lbs. of milk per day on a TMR "formulated" for 85 lbs. of milk. How do you explain this?
- A high group of cows is averaging 120 lbs. of milk per day but the top cow in the group is producing 180 lbs. of milk. How do you explain this?

What Do High Producing Herds Feed?

- •25 herds.
- · Holstein herds fed TMR's.
- · Northeast and Midwest herds.
- Milk = 30,842 lbs./cow (28,031 to 36,729 lbs./cow).
- Milk fat, % = 3.75 (range = 3.21 to 4.26%).
- Milk true protein, % = 3.05 (range = 2.9 to 3.22).
- All rations run through the CNCPS 6.1 model.

Forages Fed and NDF			
Item	Mean	Range	
% Forage in Ration	52.9	45 – 62.8	
Corn Silage, % of Ration DM	32.2	18.8 – 49	
Corn Silage, % of Forage DM	62.1	35.2 – 80.9	
Ration NDF, %	30.1	24.5 - 32.8	
Forage NDF, % of Ration DM	22.9	19.75 – 28.2	

Other Forages Fed

Forage	Number of Herds	% of Total DM	% of Forages Fed
Straw	4	1.2	2.3
Dry Hay	12	3.47	6.5
Hay crop Silage	25	18.9	37

Ration Protein and Amino Acids

Item	Mean	Range
CP, %	16.7	14.3 – 18.1
MP, g/day	3007	2501 – 3718
MP bacteria, % of total MP	46.3	38.9 – 52.6
Lysine, % of MP	6.5	5.87 - 6.94
Methionine, % of MP	2.16	1.76 – 2.55
Lysine:Methioni ne ratio	3.06:1	2.54:1 – 3.76:1

Starch, Sugar and Fat

Item	Mean	Range
Ration Starch, %	26.7	21.3 – 30.1
Ration Sugar, %	4.4	2.7 – 8.3
Ration Fat, %	5.3	4.2 - 6.6

Energy Sources Fed

- HMSC = 10
- Tallow = 9
- Corn grain = 21
- Bypass fat = 20
- Whey = 6
- Molasses = 10
- Sugar = 4
- Whole cottonseed = 13

Protein Sources Fed

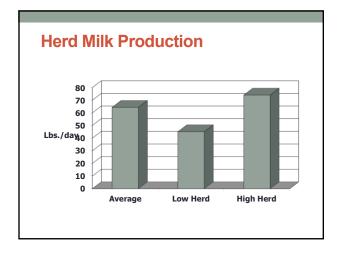
- · Corn gluten feed = 9
- · Canola meal = 18
- Corn germ meal = 4
- Urea = 12
- Corn gluten meal = 2
- Animal protein blends
- Distillers = 13
- Soybean meal = 14
- Blood meal = 13
- Roasted soybeans = 8

- Expeller SBM = 20
- RP methionine = 18

Non-dietary Factors and Milk Production

- · 47 herds in NE Spain
- -3,129 cows
- All herds were fed the <u>same TMR</u>
- Mixed at the cooperative and delivered to each herd daily
- Feed delivered per cow ranged from 35.4 to 54.3 lbs. of DM

Bach et.al., J. Dairy Sci. 91:3259-3267, 2008



What Were the Key Differences in These Herds?

- Age at 1st calving was negatively correlated with milk production
- Stalls/cow were positively related to milk
- Herds that pushed up feed produced 8.3 lbs. more milk
- Herds that had refusals produced 3.5 lbs. more milk.

These factors accounted for >50% of variation in milk production

Corwin Holtz - 2010

- 7 Big Management Areas That Make a Difference
 - 25% = Cow Comfort
 - 25% = Forage Quality
 - 15% = Transition/Dry Cow Mgmt.
 - 15 % = Reproduction
 - 10% = Routine
 - 5% = Social interaction
 - 5 % = Nutrition
- Holtz-Nelson Consulting Group

Feeding Management and Milk Production

- Sova et. al., JDS 2013 -
 - 22 free-stall herds in Ontario.
 - Herd size = 162 cows.
 - Average group size 83 cows.
 - Average days in milk = 187.
 - Average DMI = 54.5 lbs.
 - Average milk production = 75.5 lbs.
 - TMR's were studied for 7 consecutive days.
- If multiple feeding groups, used the highest producing group.
- Feeds fed and refused were recorded and sampled daily.

Key Findings

- Feeding 2x versus 1 x =
 - Increase of 3.1 lbs. of DMI.
 - Increase of 4.4 lbs. of milk.
 - Decreased ration sorting.
- Every 2% group-level sorting of long particles was associated with a 2.2 lbs. per day decrease in milk.
- · Sova et.al., 2013

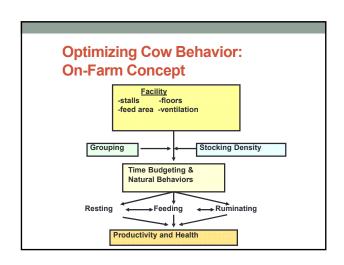
Cow Comfort

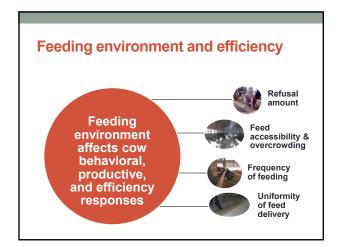
- A 700 cow herd built a new free-stall barn to reduce cows/stall from 1.2 to 1.
 - Predicted milk response was 5-6 lbs./day.
 - Actual was 8-10 lbs. of milk.
- At Cornell, we moved from a 40 year old free-stall barn to a new, sand-bedded free-stall barn in 2013:
 - Resting time increased.
 - Time standing decreased.
 - Milk increased 7-9 lbs. with no ration change.
- Many other herds report increases of 5 12 lbs. of milk per cow when cow comfort is improved.

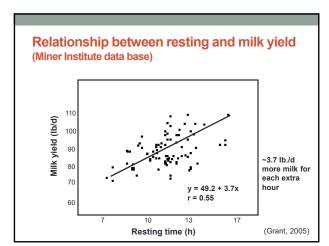
Feed bunk space affects where cows choose to eat (Rioja-Lang et al., 2012)

- \cdot Compared 76, 60, 46, and 30 cm of bunk space and preference for:
 - · low-palatability feed alone
- · high-palatability feed next to a dominant cow
- · Y-maze testing to offer choices

Space (cm)	HPF Dominant	Equal choice	LPF Alone	P
30	0	1	11	<0.001
46	1	3	8	<0.05
60	3	4	5	>0.05
76	5	2	5	>0.05







Kentucky High Producing Herds

- Smith et. al., The Professional Animal Scientist 2013.
- Surveyed 23 Kentucky dairy herds with > 22,000 lbs. of milk. Average milk = 23,736 lbs. (range = 22,028 to 27,687 lbs. milk).
- 65% of the herds were partial confinement and 35% were total confinement.
- Average number of cows = 191 (range 25 to 1,590).
- 74% of the herds milked 2x.

Kentucky Herds – Management Practices Adopted

- Regular forage testing = 100%.
- Fans, sprinkler or both = 91%.
- Rations balanced at least yearly = 87%.
- Separate far-off and close-up groups = 70%.
- Kernel processor = 70%.
- Electronic feed management program = 57%.
- Push up feed regularly = 52%.

Kentucky Herds – Feed Additives

- Use rumen buffers = 91%.
- Use yeast cultures = 78%.
- Use organic or chelated minerals = 65%.
- Use mycotoxin binders = 65%.
- •Use bypass = 57%.
- Use ionophores = 57%.
- · Use direct-fed microbials = 43%.
- · Use anionic salts = 35%.

"What 1 Management Practice Has Contributed the Most to Your Current Level of Milk Production?

- Attention to detail = 8 responses.
- Nutrition = 5 responses.
- Cow comfort = 4 responses.
- Quality forages = 4 responses.
- Record keeping = 3 responses.
- Genetics = 3 responses.
- · Consistency = 2 responses.
- · Many others had 1 response each.

Survey of Kentucky dairy herds.

Milking Frequency, % of Herds

2x	3x	4x
39	61	
	100	
20	72	8
74	26	
	83	17
33	67	
	39 20 74	39 61 100 20 72 74 26 83

Number o	of Feedings	s/Day, % o	f Herds
			0.

1	2	3+
70	22	8
20	60	20
44	41	15
20	40	40
100		
67	22	11
	20 44 20 100	1 2 70 22 20 60 44 41 20 40 100

Number of Feed Pushups/Day, % of Herds

Survey	0	1-3	3-6	>6
New York, 2000	13	26	35	26
Wisconsin, 1997		17	67	16
Wisconsin, 2004	33	17	17	33
Wisconsin, 2010	20		20	60
Wisconsin consultant	11	11	56	22

Phil Helfter - Norco Farm - 1999

- •"Nutrition is not the key to my success"
- · Northern NY herd.
- •800 cows.
- Consistently > 100 lbs. of milk per cow shipped.
- "If a cow gets sick, it's my fault"

J. Kollwelter WI- 2013

- I really believe by the year 2020 we should be able to push 50,000 pounds of milk.
- 210 cows, currently 40,280 lbs. milk.
- CI = 13.2, CR = 60%, AFC =22-23 months.
- "Nothing replaces walking the pens, looking at cows and being observant"
- "There are no secrets. Cow comfort, feeding a balanced ration, good genetics....all the information is out there"
- "I don't push the cows I just set them up to succeed"

Gordie Jones - 2014

- · Rules that still apply:
 - Cow comfort is first
 - Forage is king
 - And better forage is better
 - Preg rate means you keep cows
 - Dry cow program stops early fresh cow losses
 - Milk quality is EVERYTHING

Dr. Herb Bucholtz - Michigan State - 2006

• "To achieve high per cow milk production, there are no magic ingredients or herd management techniques. It is a combination of overall excellent management of all aspects involved in feeding and managing the entire dairy herd"

Jim Barmore - 2006

 "Dairy producers need to spend more time on feeding management (feed delivery, feeding frequency, ration variation) vs. ration formulation. I see very few problems today in ration formulation and several opportunities for improvement in feeding management."

Dairy Consultant - Wisconsin

What Have We Learned?

- Ration nutrient specifications in high producing herds are "similar" to the nutrient profiles of many other herds.
- These herds use a wide variety of forages, feed ingredients and feed additives to obtain the final ration nutrient parameters.
- These herds generally tend to have more 1st lactation animals, a lower AFC, lower SCC, higher 21 day pregnancy rates and fewer fresh cow problems.

Summary

- My key points from working with and observing these herds:
 - They have comfortable cows.
 - High quality forages.
 - High and consistent DMI.
- A "cow person" that observes and manages the cows on a daily basis.





Food Safety Modernization Act of 2011

- Signed into law on Jan. 4, 2011
- <u>Greatly</u> expands FDA's authority to regulate the U.S. food supply
 - Mandates that FDA create a <u>new prevention-based regulatory system</u> to ensure the safety of food/feed products
 - Requires FDA to develop and issue more than 50 regulations and/or guidance documents

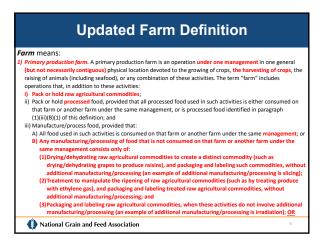
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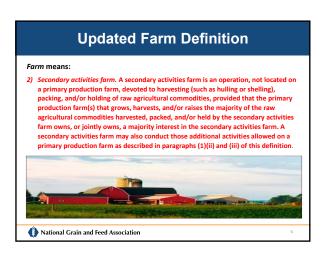
Subject of FSMA Rule	Date Regs Issued
Current Good Manufacturing Practice (CGMPs) and Preventive Controls – Human Food	Aug. 30, 2015
Current Good Manufacturing Practice (CGMPs) and Preventive Controls – Animal Food	(Sept. 17, 2015)
Produce Safety Standards	Oct. 31, 2015 (Nov. 27, 2015)
Foreign Supplier Verification Programs	Oct. 31, 2015
Accreditation of Third-Party Auditors	(Nov. 27, 2015)
Sanitary Transportation of Food **	March 31, 2016
Food Defense/Intentional Adulteration **	May 31, 2016

Applicability of FSMA Rules

- Who's In, Who's Out ...
 - FSMA rules generally apply to facilities required to register as a "food facility" with FDA under Bioterrorism Act requirements
 - Farms (operations meeting FDA's definition of a "farm") are exempt
 - Individual rules also specify certain exemptions and modified requirements

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The Farm Definition and Feed

- The farm definition includes operations under one management devoted to the raising of animals that manufacture feed so long as the feed is consumed on that farm or another farm under the same management; e.g., feedlots, laying operations where hens are fed on farms under the same management
 - Current definition is size-neutral; FDA says this is a "gap" they intend to address



The Farm Definition and Feed

 The farm definition does <u>not</u> include operations under one management where feed is manufactured and animals are fed on a farm or farms <u>not</u> under the same management; e.g., contract grower arrangements where animals are fed on farms <u>not</u> under the same management that produces the feed

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Applicability of FSMA Rules

1-2. Human Food and Animal Food CGMP and Preventive Controls

- Facilities "<u>solely engaged</u>" in storing grain and oilseeds exempt from requirements to implement CGMPs and preventive controls
 - Different treatment for elevators handling "fruits" [i.e., lentils, kidney beans, pinto beans, lima beans, coffee beans, cocoa beans, peanuts, tree nuts and seeds for direct consumption (e.g., sunflower seeds)]
 - Elevators solely engaged in storing, handling such "fruits" exempt from CGMP requirements, but <u>not</u> exempt from the preventive controls and supply chain program requirements
- Grain millers, processors potentially covered by rules for human food and animal food
- Feed and pet food facilities covered by animal food rule



Applicability of FSMA Rules

- 3. Foreign Supplier Verification Programs
 - Applies to importers of grains and oilseeds, feed ingredients - could include a grain elevator
- 4. Accreditation of Third-Party Auditors
 - Applies to foreign food in certain circumstances; i.e., high-risk designation by FDA or participation in Voluntary Qualified Importer Program (VQIP)
- 5. Sanitary Transportation of Food
 - Will apply to grain elevators and feed facilities; will cover truck and rail transportation
- 6. Food Defense/Intentional Adulteration
 - FDA proposed that animal food be exempt, human food covered
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CGMPs and Preventive Controls for Animal Food PART 507—Current Good Manufacturing Practice, Hazard Analysis, and Risk–Based Preventive **Controls for Food for Animals: Subpart A: General Provisions** FEDERAL REGISTER Subpart B: Current Good Manufacturing Practices (CGMPs) Subpart C: Hazard Analysis and September 17, 2015 Risk-Based Preventive Controls Subpart D: Withdrawal of a **Qualified Facility Exemption** Subpart E: Supply-Chain Program **Subpart F: Requirements Applying** Department of Health and Human Se to Records That Must Be **Established and Maintained** National Grain and Feed Association

Qualified Individual Requirements

- Individuals who manufacture, process, pack, or hold animal food subject to the rule are to be qualified to perform their assigned duties
 - Each individual (including temporary, seasonal and contract personnel) must:
 - Have the education, training, or experience (or a combination thereof) necessary to manufacture, process, pack, or hold safe animal food as appropriate to the individual's assigned duties; and
 - Receive training in the principle of animal food hygiene and animal food safety, including the importance of employee health and personal hygiene, as appropriate to the animal food, and the facility

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Qualified Individual Requirements

- Rule does not specify the frequency of training, but FDA expects training to occur before working in production operations and periodic refresher training thereafter
- Rule requires that training records are to be maintained for at least two years
- Rule does not prescribe the content of training records

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CGMPs Requirements

- CGMPs Required conditions and practices to ensure that animal feed/pet food will not become adulterated
- CGMPs establish <u>new</u> requirements for animal feed/pet food facilities
 - All other applicable regulations still apply
 - BSE-Prevention requirements
 - 21 CFR Part 225 CGMPs
 - Others ...

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CGMPs Requirements – Overview

- Establish requirements for following conditions/practices:
 - · Personnel cleanliness and training
 - Plant and grounds maintenance, design, construction
 - Sanitation housekeeping, cleaning, pest control
 - Water supply and plumbing water quality, plumbing design, rubbish control
 - Equipment and utensils maintenance, design, construction
 - Plant operations labeling, inspection of raw materials, ingredients, protection against metal/foreign objects
 - Holding and distribution storage and transportation
 - Holding and distribution of human food by-products for use as animal food



Exempt from CGMPs

- 1. Farms
- Establishments solely engaged in the holding and/or transportation of one or more raw agricultural commodities other than fruits or vegetables (e.g., grain elevators)
- Establishments <u>solely</u> engaged in hulling, shelling, drying, packing, and/or holding nuts and hulls (without manufacturing/processing, such as grinding shells or roasting nuts)
- Establishments <u>solely</u> engaged in ginning of cotton (without manufacturing/processing, such as extracting oil from cottonseed)

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Preventive Controls for Animal Food – Overview

- Requires covered facilities to develop and implement a written animal food safety plan
 - Plan to be developed/overseen by a "preventive controls qualified individual"
 - Preventive controls qualified individual means a
 qualified individual who has successfully completed
 training in the development and application of riskbased preventive controls at least equivalent to that
 received under a standardized curriculum recognized
 as adequate by FDA (Food Safety Preventive Controls
 Alliance), or is otherwise qualified through job
 experience to develop and apply an animal food safety
 system.

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Preventive Controls for Animal Food – Overview

- Animal Food Safety Plan to include a written hazard identification and analysis
 - Identify and evaluate "known or reasonably foreseeable hazards" – physical, chemical (radiological), biological, including those associated with intentional economic adulteration
 - Implement one or more "preventive controls" effective in preventing any hazard identified during the hazard evaluation as being a "hazard requiring a preventive control" from adulterating product

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Preventive Controls for Animal Food – Overview

- IF a "hazard requiring a preventive control" is identified, then one or more "preventive controls" and "components to manage such controls" are to be implemented to ensure the hazard is controlled effectively. "Components to manage such controls" include, as appropriate to the preventive control:
 - Monitoring
 - Validation
 - Verification
 - · Corrective actions and corrections
 - Records
 - Recall plan

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Preventive Controls for Animal Food – Overview

- All required activities within the animal food safety plan are to be documented and retained for at least two years; <u>electronic records</u> allowed
- Reassessment of animal food safety plan is required
 - At least every three years entire plan
 - More frequently if situations prescribed in the rule occur

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Exempt from Preventive Controls

- Farms
- Facilities <u>solely</u> engaged in the storage of raw agricultural commodities (other than fruits and vegetables) intended for further distribution or processing, e.g., grain elevators
- Facilities <u>solely</u> engaged in the storage of unexposed packaged animal food that does not require time/temperature control to significantly minimize or prevent the growth of, or toxin production by, pathogens



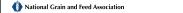
Supply-Chain Program Requirements for Animal Food – Overview

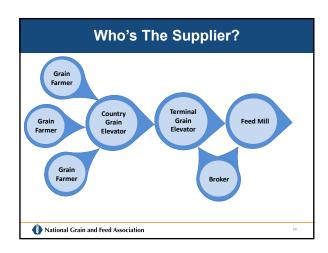
- Applies to a covered facility that has identified a hazard requiring a preventive control and who relies on its "supplier" to control the hazard
- Supply-chain-applied control means a preventive control for a hazard in a raw material or other ingredient when the hazard in the raw material or other ingredient is controlled before its receipt

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Supply-Chain Program Requirements for Animal Food – Overview

 Supplier means the establishment that manufactures/processes the animal food, raises the animal, or grows the food that is provided to a receiving facility without further manufacturing/processing by another establishment, except for further manufacturing/processing that consists solely of the addition of labeling or similar activity of a de minimis nature





Supply-Chain Program Requirements for Animal Food – Overview

- <u>IF</u> a receiving facility has identified a hazard requiring a *supply-chain-applied control*, then the receiving facility is required to have a written supply-chain program to:
- Receive that raw material or ingredient only from approved suppliers
- Perform activities to verify that the supplier is adequately controlling the hazard



Compliance Dates for CGMPs and PCs				
Business Size	CGMPs Compliance Date	Preventive Controls Compliance Date		
Business Other than Small and Very Small	1 year – Sept. 19, 2016	2 years – Sept. 18, 2017		
Small Business	2 years – Sept. 18, 2017	3 years – Sept. 17, 2018		
Very Small Business	3 years – Sept. 17, 2018	4 years – Sept. 17, 2019		
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Business Sizes

- Small Business: A business employing fewer than 500 full-time equivalent employees. The rule specifies that when determining the number of full-time equivalent employees, the calculation is to include all employees of the business rather than be limited to the employees at a particular facility.
- Very Small Business: A business (including any subsidiaries and affiliates) averaging less than \$2,500,000, adjusted for inflation, per year, during the 3-year period preceding the applicable calendar year in sales of animal food plus the market value of animal food manufactured, processed, packed, or held without sale (e.g., held for a fee or supplied to a farm without sale).

National Grain and Feed Association

Compliance Dates for Supply-Chain Program				
Situation	Compliance date:			
A receiving facility is a small business and its supplier will be subject to the CGMPs, but not the preventive control requirements, of the animal food preventive controls rule	Six months after the receiving facility's supplier of that raw material or other ingredient is required to comply with the CGMP requirements of this rule			
A receiving facility is a small business and its supplier is subject to the animal food preventive controls rule	The later of: <u>September 17, 2018</u> or 6 months after the receiving facility's supplier of that raw material or other ingredient is required to comply with this rule			
A receiving facility is not a small business or a very small business and its supplier will be subject to CGMPs, but not the preventive control requirements, of the animal food preventive controls rule	Six months after the receiving facility's supplier of that raw material or other ingredient is required to comply with the CGMP requirements of this rule			
A receiving facility is not a small business or a very small business and its supplier will be subject to the animal food preventive controls rule	The later of: <u>September 18, 2017</u> or 6 months after the receiving facility's supplier of that ray material or other ingredient is required to comply with the applicable rule			

FDA Guidance Documents – In Process

- Current Good Manufacturing Practices
- Human Food By-Products for Use as Animal Food
- Hazard Analysis and Preventive Controls
- A Small Entity Compliance Guide that explains the actions a small or very small business must take to comply with the rule



Food Safety Preventive Controls Alliance

- FDA-recognized hazard analysis and preventive controls training for food/feed industry and regulatory personnel -
- Developed by subject-matter experts from government, industry, academia
- Individuals successfully completing training will be "preventive controls qualified individuals"
- Curriculum likely to be available in June
- Likely will be a 20-hour course



National Grain and Feed Association

Food Safety Modernization Act

David Fairfield

Senior Vice President, Feed Services National Grain and Feed Association Email: dfairfield@ngfa.org Phone: (712) 243-4035

National Grain and Feed Association

Information Used to Monitor Our Robotic Milking Herd

Scott and Laura Flory Hillside Farm Dublin, VA



Hillside Farm

- Herd size 230
- Facility- Freestall Barn with 4 Lely A-4's and Juno Feed Pusher
- Closed Loop Flush System with Sand Lane
- Automatic Calf Feeder and Growing Calf Barn
- RHA 27,300 lbs/cow



Flory | Hillside Farm

2





Scope of Data

- •100 data points/cow/day
- Over 20,000 numbers collected in 24 hours herd wide
- One lactation = 500x amount of data as monthly test data

"It's not information overload, it's filter failure." -Clay Shirky

Flory | Hillside Farm

Rumination

- Herd Wide
- Within Management Groups
- Individual Animals
- Precedes all unfavorable circumstances



Milkings/Cow/Day

- Total Free Flow System
- Leads Milk Production
- Managed Herd Wide, Groups, Individual Animals



Flory | Hillside Farm

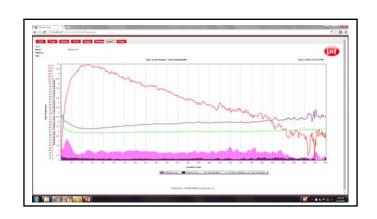
Production/Components

- Focus on key management groups (i.e. Fresh Cows)
 - Production
 - Deviations over time
 - Fat/Protein Indication
 - Fat/ Protein Ratio

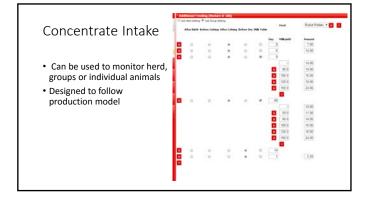


Refusals

- Unrewarded visits to robot (i.e. too early)
- Indicator of energy status or animals comfort level and curiosity
- Managed by group status or herd only

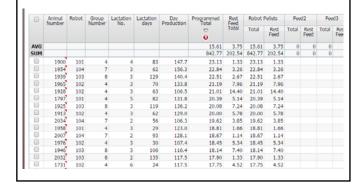


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Rest Feed

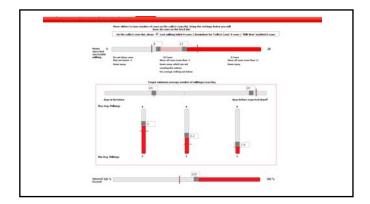
- Measure of how much concentrate was unclaimed based on amount allowed per production table
- Controlled amount allowed to carry to next day
- Indicator of infrequent visits by individual animal
- Monitor as a percentage for herd basis



Fetch Cows

- List generated from:
 - Animals not milked in over 12 hours
 - Animals over 8 hours that aren't meeting their minimum average milkings based on production and stage of lactation
- •The fewer the better
- Indicator of overall nutritional balance and herd health

Flory | Hillside Farm 5



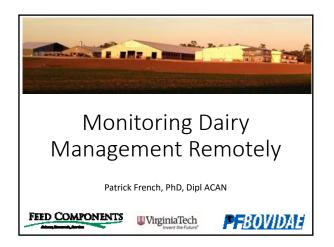
Conductivity

- •Per quarter/animal every milking
- Numerical value
- Tracking deviations from other quarters or individual history
- •Time lag on down trends
- Observation:
 - Milk volume has effect
 - False Positives





Flory | Hillside Farm 6









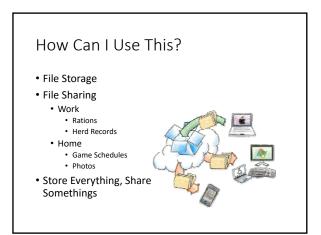


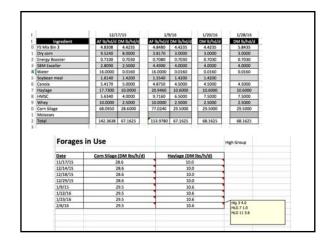


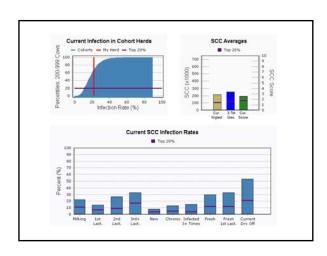








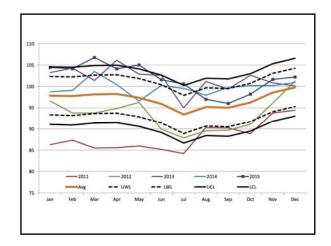




Class III Equivalent Milk (C3EM)

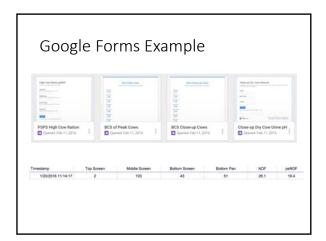
- C3EM = Calculated Milk Value / Class III * 100
- Class III Milk = [(Protein Price x 3.1) + (Other solids price x 5.9) x 0.965] + Fat Price x 3.5
- Calculate Milk Value =
 Protein lbs x Protein Price + [3.1 x 3 = 9.3]

 Fat lbs x Fat Price + [3.6 x 2 = 7.2]
 Other Solids lbs x Other Solids Price + [5.71 x 0.4 = 2.28]
 PPD + Bonuses Deductions
- **KEY** Standardized to constant prices
 - Avg Prot = \$3, Fat = \$2, Other = \$0.40



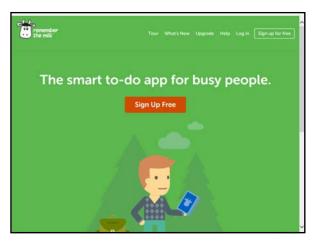


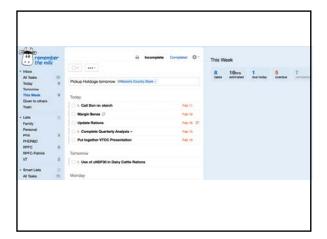








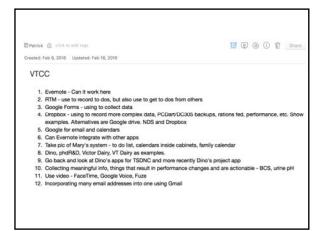






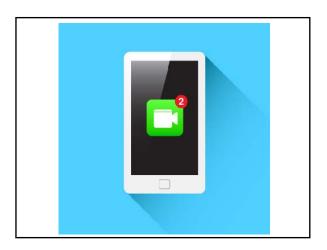






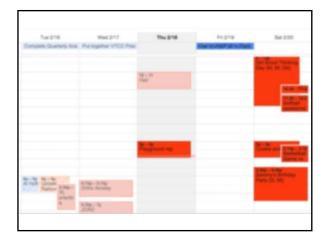








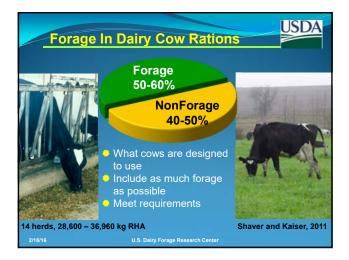


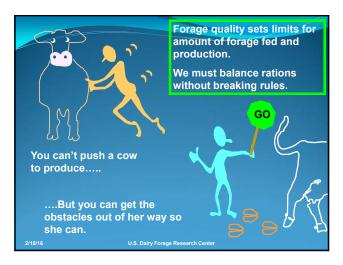


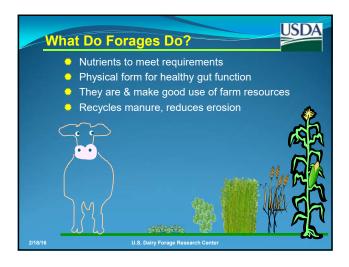






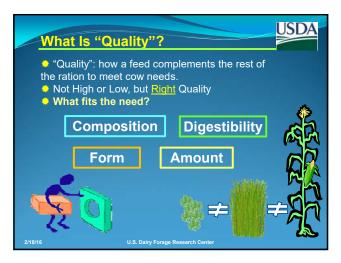


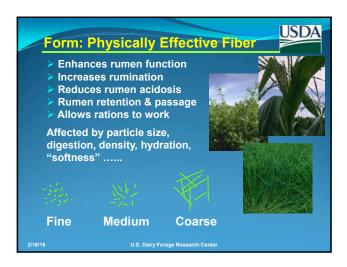


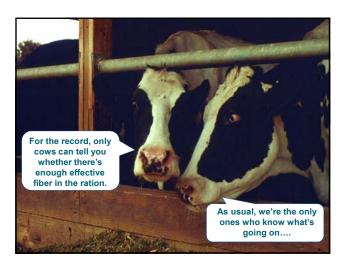


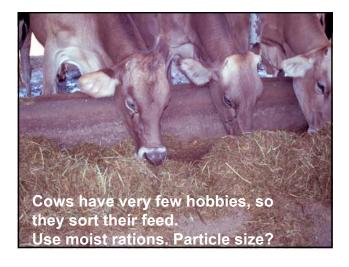




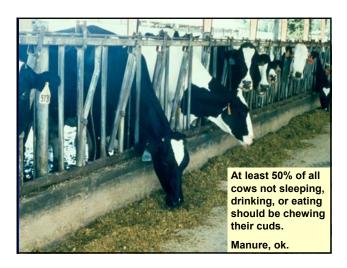








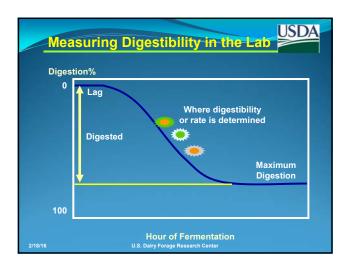


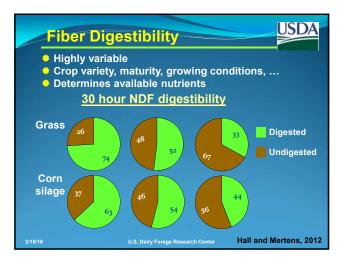


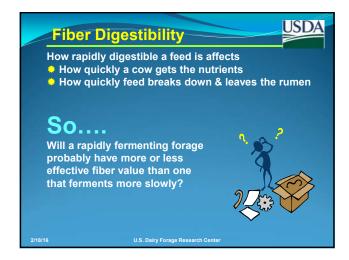




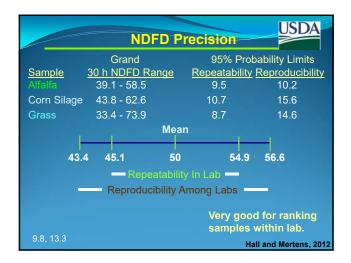


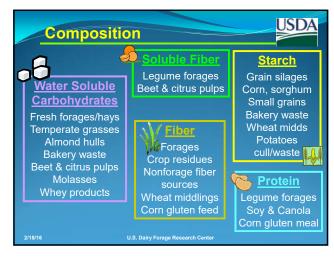




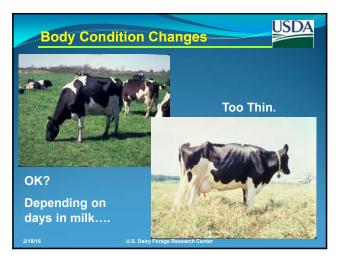


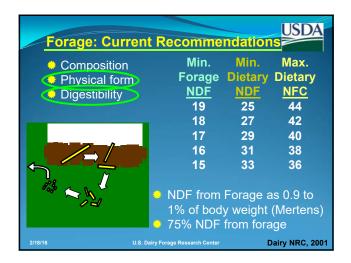


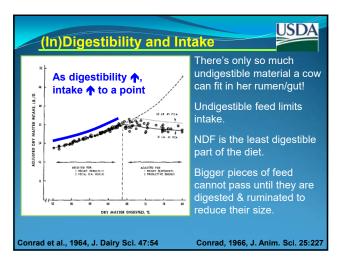


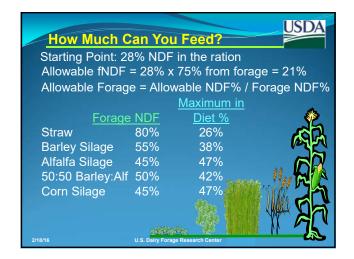


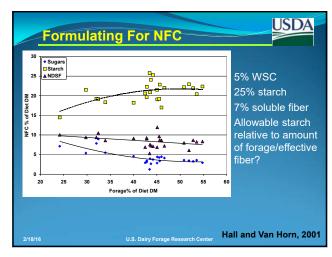


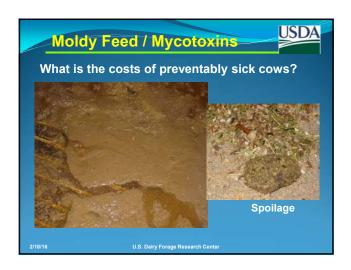


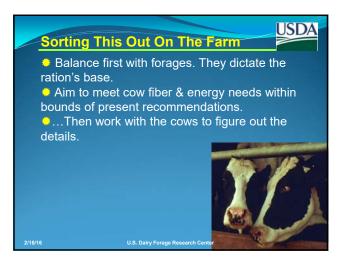






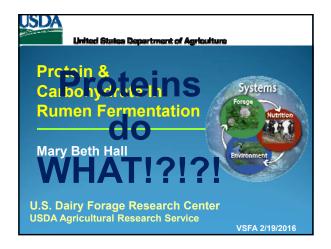




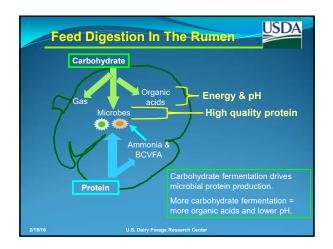


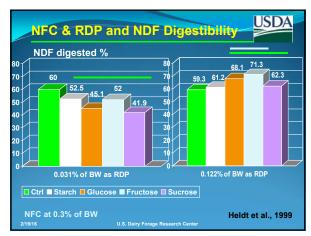


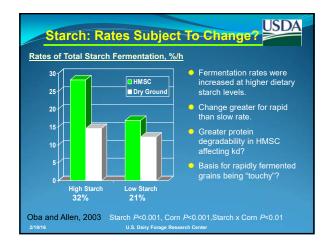


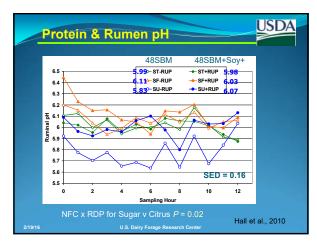


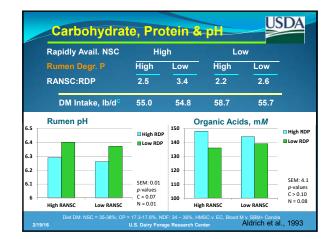


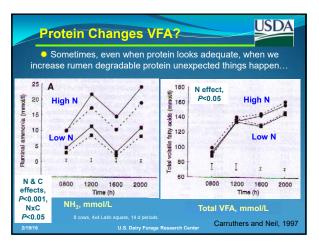


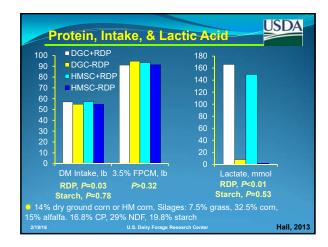


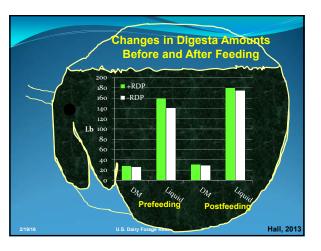


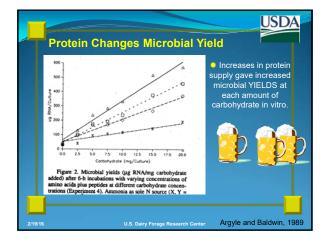


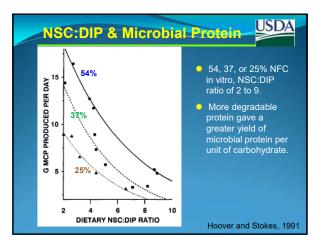


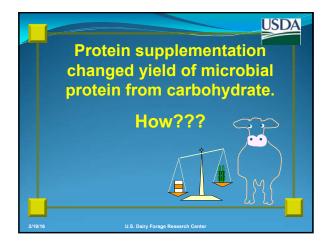


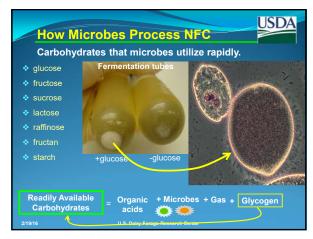


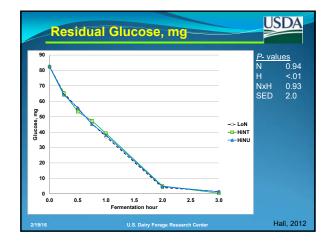


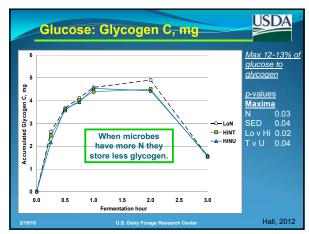


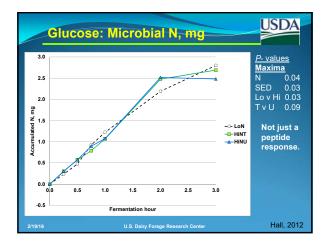


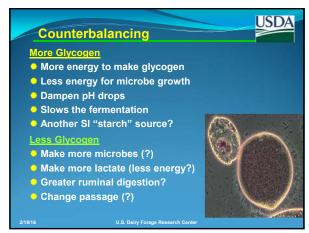




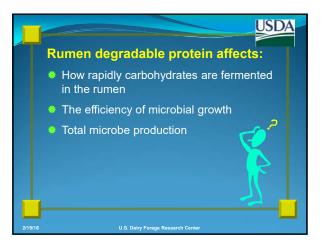


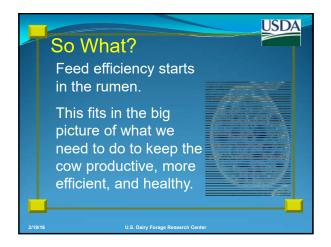


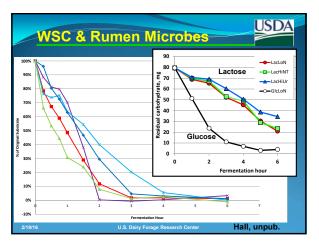


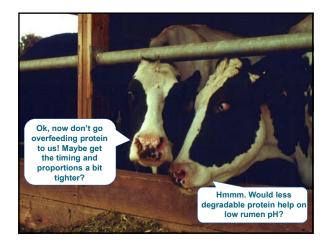


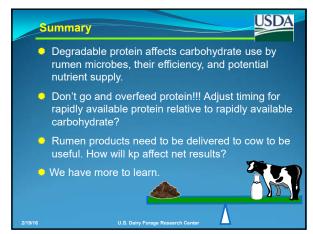






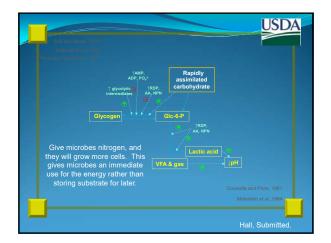


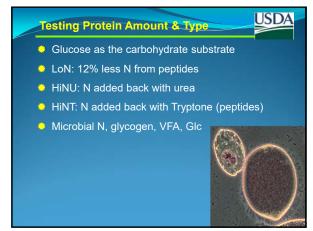


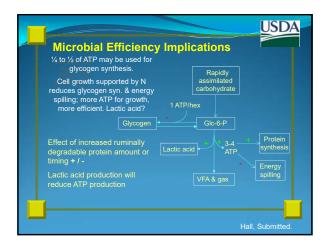














FSMA Hazard Analysis

- FSMA final rule requires each registered facility to have a written hazard analysis for chemical, physical and microbiological hazards, including the following:
 - Frequency/Probably and Severity
 - Experience
 - Scientific reports
 - Known illness and frequency
 - And the impact of the following:

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FSMA Hazard Analysis

- (1) The formulation of the animal food;
- (2) The condition, function, and design of the facility and equipment;
- (3) Raw materials and other ingredients;
- (4) Transportation practices;
- (5) Manufacturing/processing procedures;
- (6) Packaging activities and labeling activities;
- (7) Storage and distribution;

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FSMA Hazard Analysis

- (8) Intended or reasonably foreseeable use;
- (9) Sanitation, including employee hygiene; and
- (10) Any other relevant factors such as the temporal (e.g., weather-related)
- And nature of some hazards (e.g., levels of some natural toxins).

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FSMA Hazard Analysis

- · Is that enough?
- · Can you do it?
- More than a HACCP program requires
- AFIA is partnering with the University of Minnesota's Center for Animal Health and Food Safety to do a generic HA for the feed industry
- · Will be available in late October.

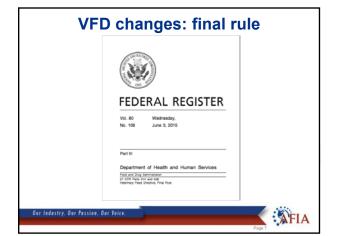
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FSMA Hazard Analysis

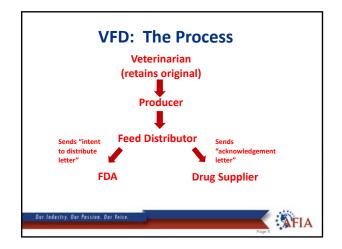
- All AFIA members will receive CAHFS report with details on how to use
- Must have your PCQI review it and make it facility specific and add your mill's experience
- Have invited NGFA to join the project
- This will save each facility considerable resources, as doing a hazard analysis will be expensive
- Funded by AFIA's foundation--IFEEDER

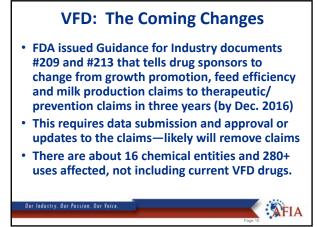
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VFD: The Coming Changes

- These drugs would come under the control of a veterinarian via VFD
- This would include many feed drugs except dewormers, carbadox, bambermycins, ionophores, bacitracin and a few others
- AFIA has focused on the VFD process and the administrative changes needed to assist in an orderly transition
- VFDs will be required for each use of a drug, including for FFA and 4-H use

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VFD: Practical Issues

- Original VFD form is retained by the veterinarian and copies to the producer and feed distributor
- Faxes (and limited electronic) VFDs are allowed
- · Phone-in VFDs are not allowed
- Feed mills can deliver smaller amounts than on VFD and save rest for later
- Delivering a VFD to the farm before the producer has a VFD form is problematic

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VFD: Current Challenges (cont'd.)

- More VFD approvals increases paperwork load and review times for feed mills
- AFIA says say feed mills put at disadvantage when producer customer cannot be served appropriately due to incorrect forms
- Storing VFD drugs prior to use and prior to receiving the VFD is a problem for producers
- · AFIA is addressing this issue with FDA

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VFD: Concerns The following concerns have arisen: Scanned VFDs from the veterinarian must be printed and filed unless the feed distributor has a FDA registered computer (21 CFR, Part 11) Veterinarians must complete a "Veterinarian's Intention Statement" Will allow faxes and pdfs without hard copies, must print, date and file

VFD: Affirmation Statements

Veterinarian must mark one of the following on each VFD form:

1. "This VFD only authorizes the use of the VFD drug(s) cited in this order and is not intended to authorize the use of such drug(s) in combination with any other animal drugs."

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VFD: Affirmation Statements

Veterinarian must mark one of the following on each VFD form:

2. "This VFD authorizes the use of the VFD drug(s) cited in this order in the following FDA-approved, conditionally approved, or indexed combination(s) in medicated feed that contains the VFD drug(s) as a component." [List specific approved, conditionally approved, or indexed combination medicated feeds following this statement.]

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VFD: Affirmation Statements

Veterinarian must mark one of the following on each VFD form:

3. "This VFD authorizes the use of the VFD drug(s) cited in this order in any FDA-approved, conditionally approved, or indexed combination(s) in medicated feed that contains the VFD drug(s) as a component." (Sec. 558.6(b)(6)).

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VFD: Generic Drug Use Generics may be used if the drug or tradename is listed and the veterinarian doesn't object.

VFD: The Future Challenges

- How will this happen: all drugs VFD overnight, phase-in???
- Will drug sponsors save these changes and release all the new drugs at once?
- Will FDA require training for vets?
- Will there be a list of trained vets?
- · Where will more vets come from?
- · Will there be enforcement against vets?

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VFD: The Future Challenges

- · We are addressing all these issues with FDA
- We hope FDA is amenable to an orderly phase in as there may be the same approved drugs not requiring a VFD with the new approval that requires a VFD in the marketplace.
- FDA will likely require "stickering" of old premix bags to note that use of these premixes after 2017 will require a VFD
- · Will FDA allow those to be exhausted?

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VFD: Timeline

- October 1, new VFD rule effective
- October 31, new VFD form must be implemented
- Summer/Fall 2016, drug sponsors contacting feed companies with label changes
- January 1, 2017, must cease all growth promotion claims and hopefully can use old premixes but must have a valid VFD
- Will likely allow some time exhaust supplies: AFIA is doing a survey

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VFD: Next Steps

- Most drug sponsors seem to be removing the production claims and leaving the therapeutic claims and will contact feed companies
- If data need to be submitted, then review will take longer for the change and resulting drug will not have a generic for some years

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VFD: Next Steps

- FDA told AFIA that these changes must take place January 1, 2017 for new and old drug premixes
- We urged CVM to put out a notice industry-wide
- All old premixes will require a VFD after Jan. 1
- AFIA will be collecting data on amount of premixed in feed mills soon and in November 2016 and possibly six months after that
- This will be the basis of extension requests

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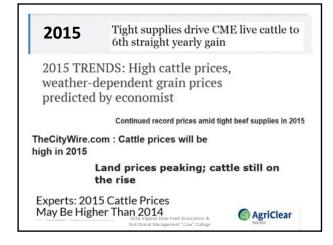


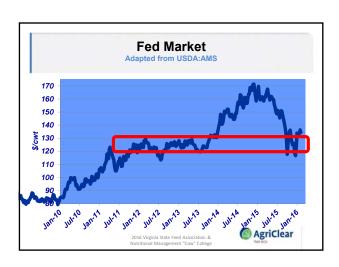
Questions/Discussion Our Industry, Our Passion, Our Voice.





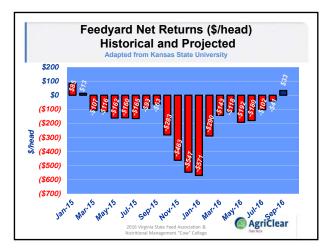


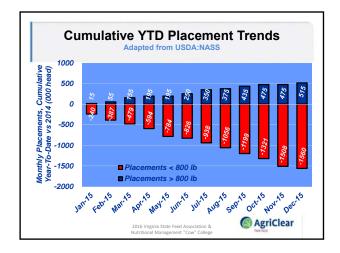


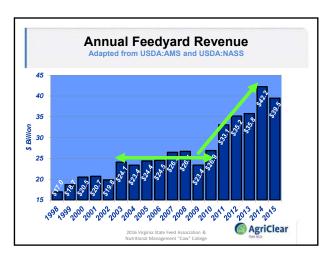


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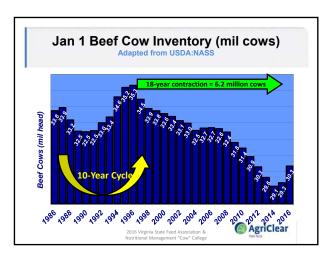


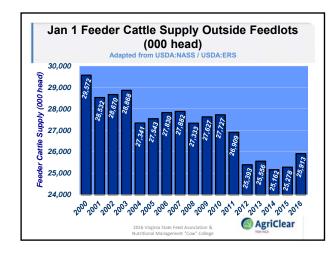


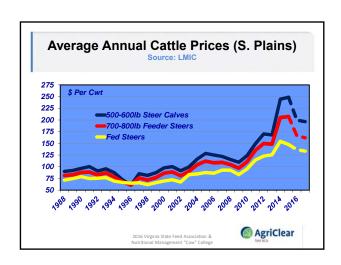


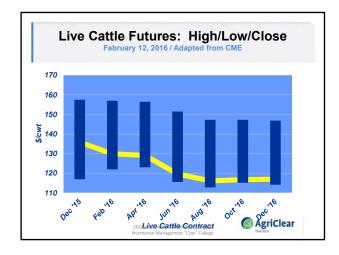
Speer | Agriclear 2

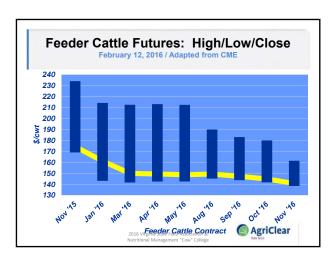


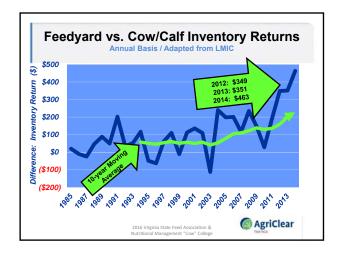


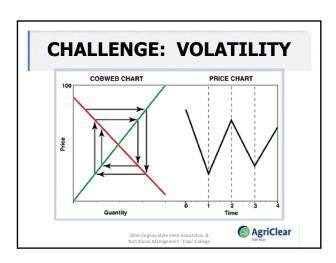


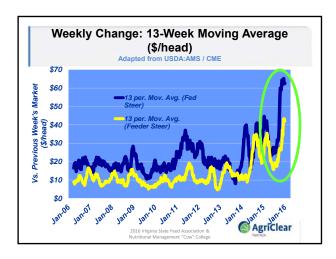


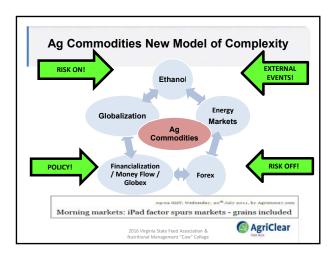


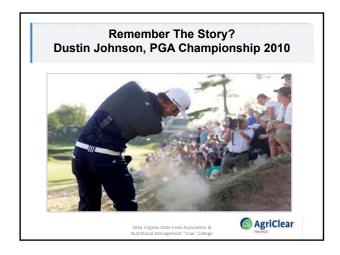






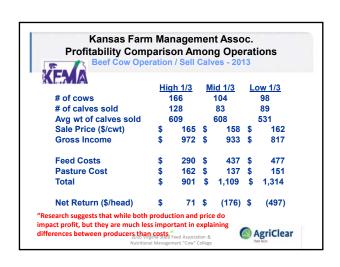


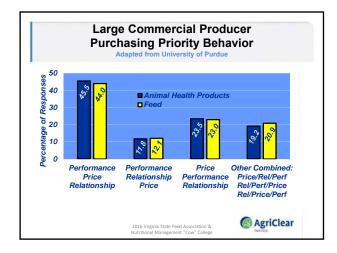






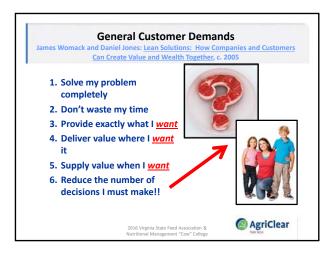


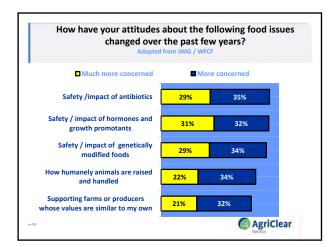


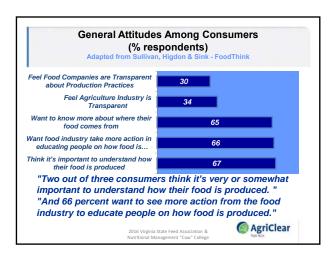










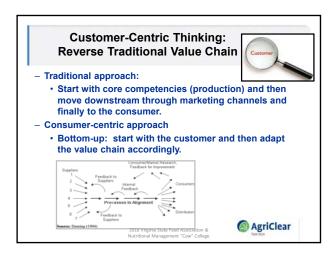




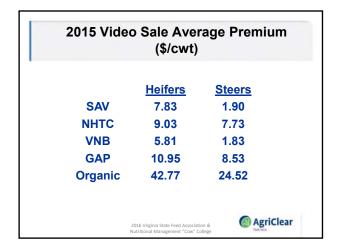




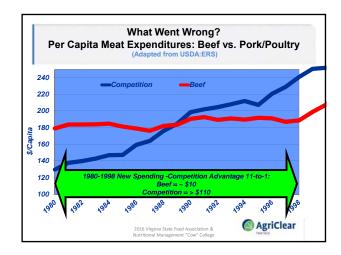






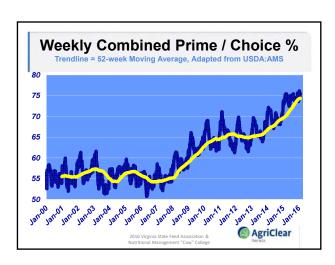


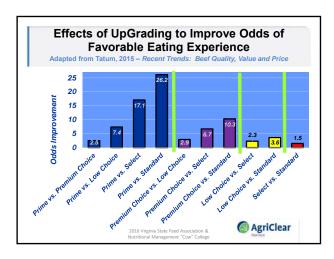


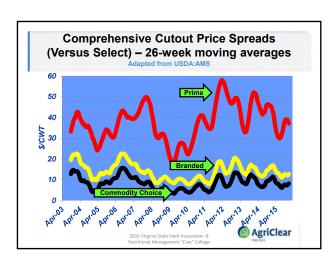




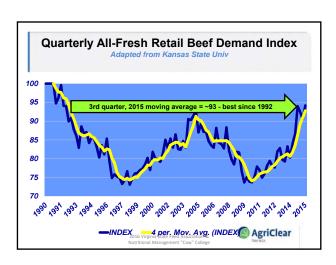


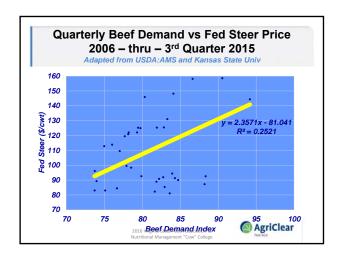


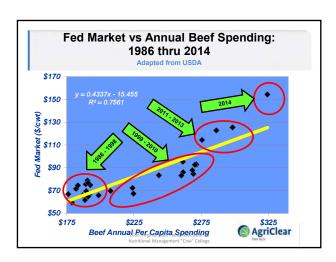








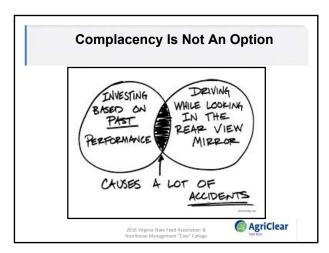


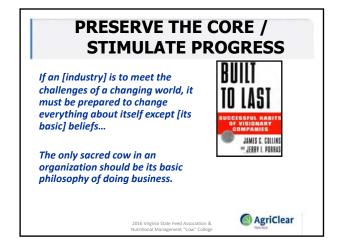






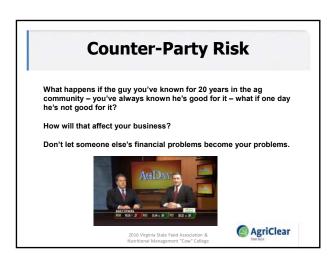


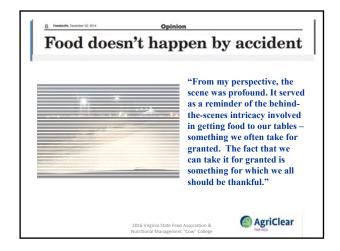




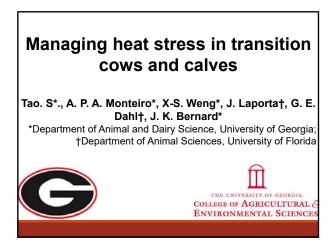


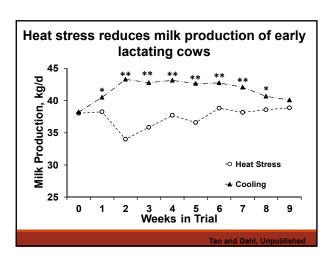


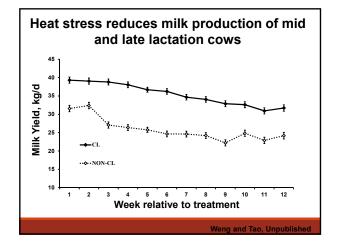


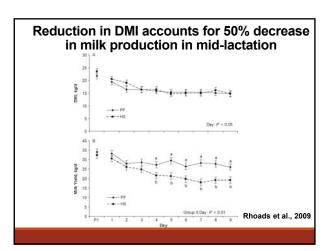


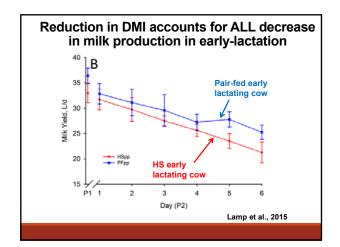


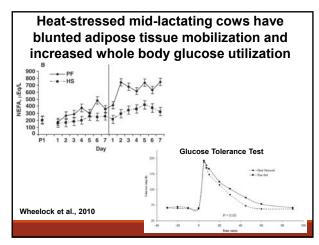


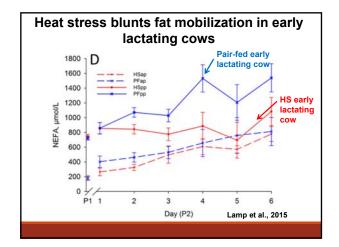


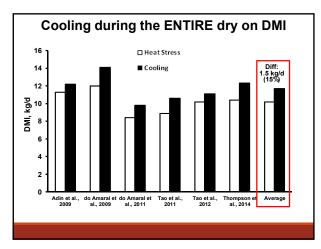


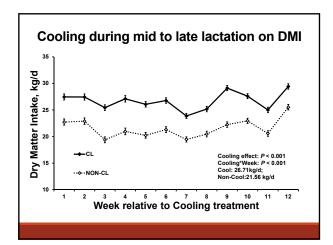


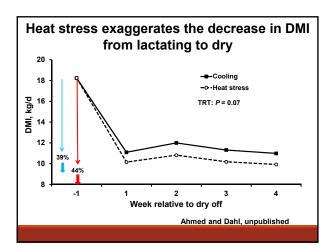


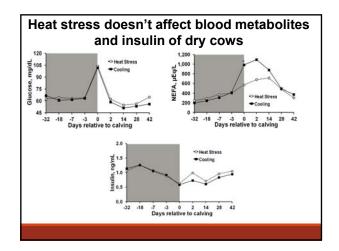


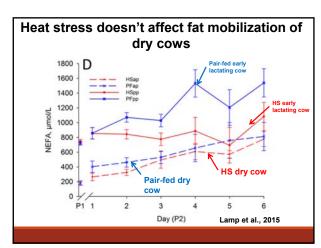


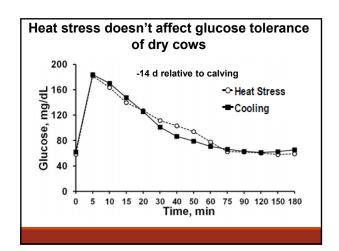


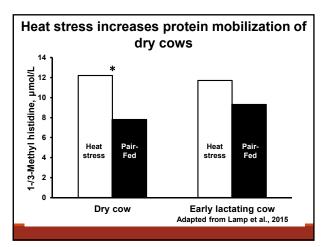


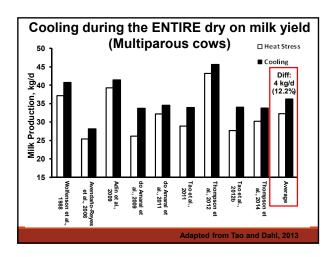


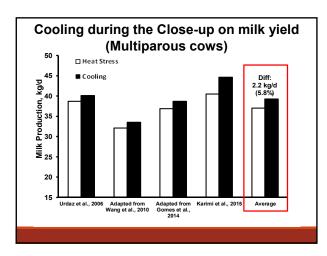


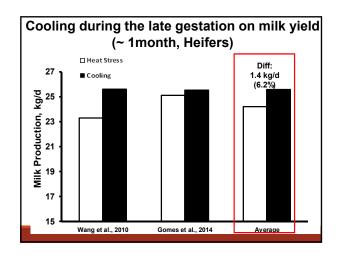


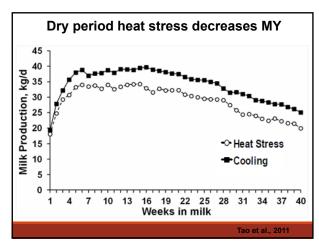


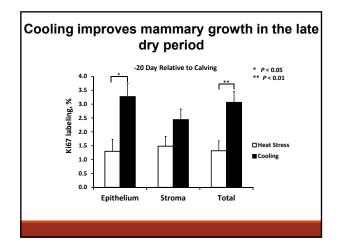


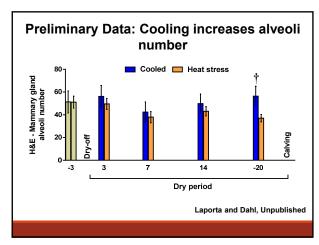


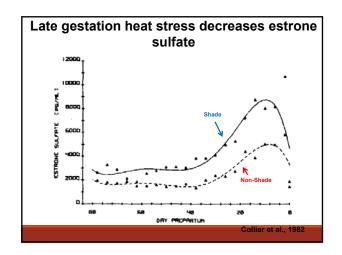


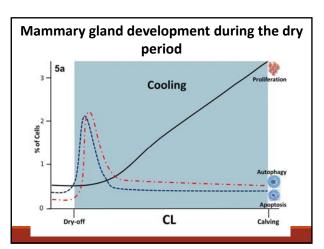


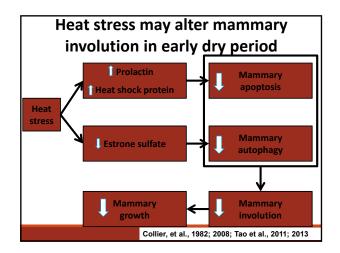


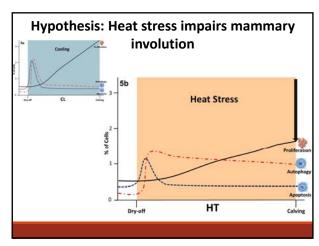


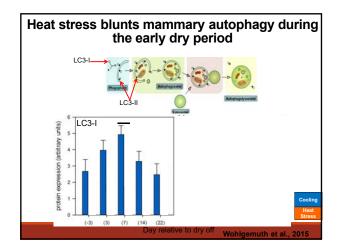


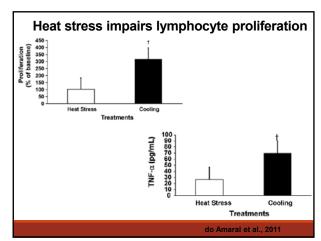


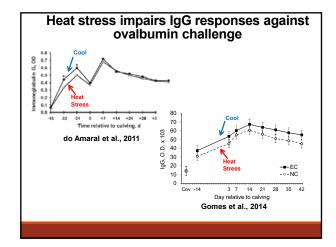


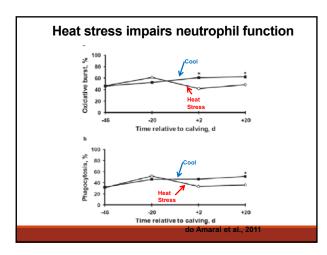


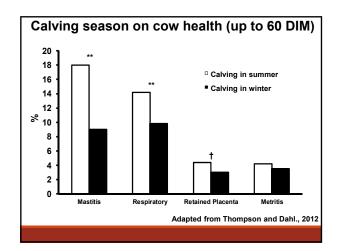


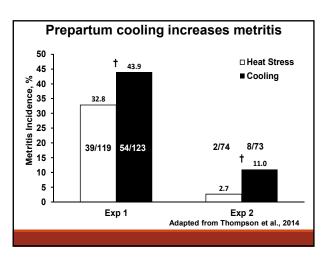


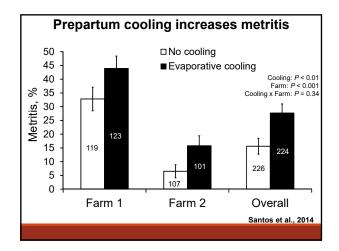


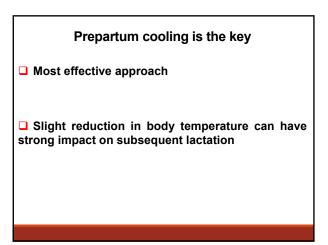


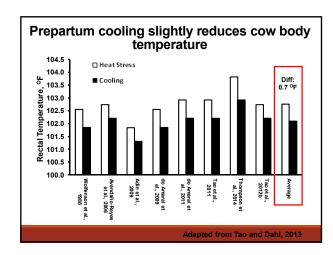


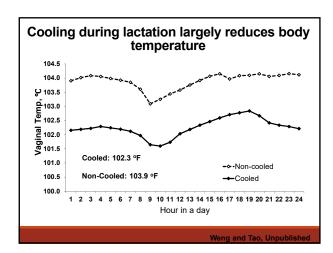


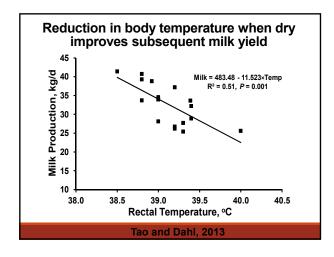


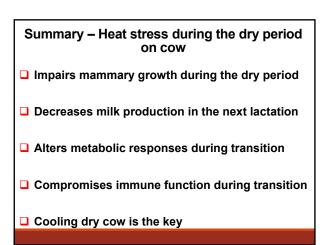


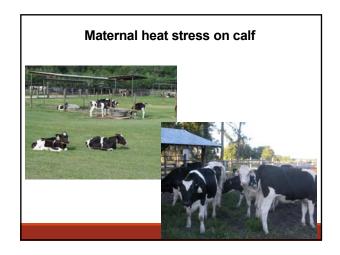


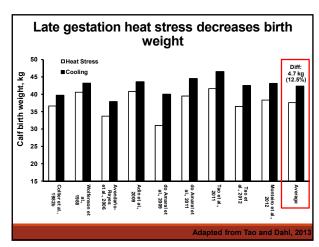


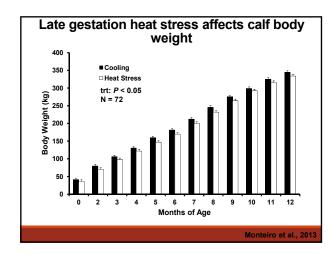


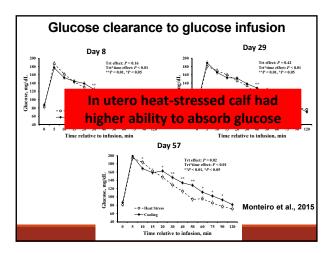


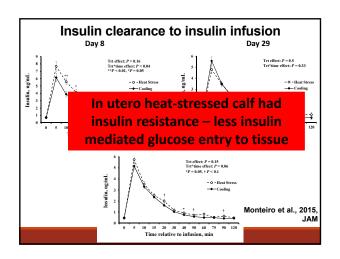


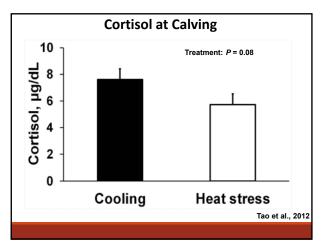


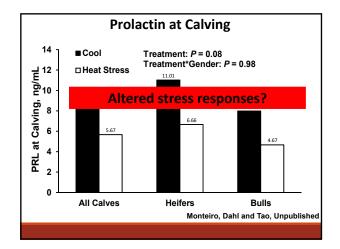


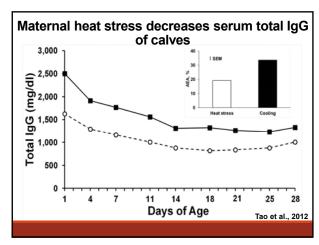


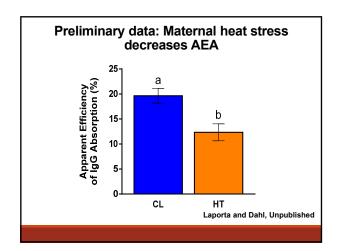


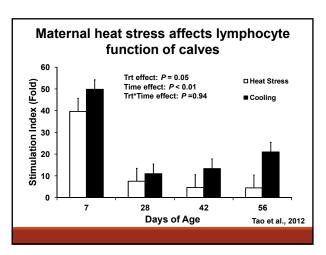




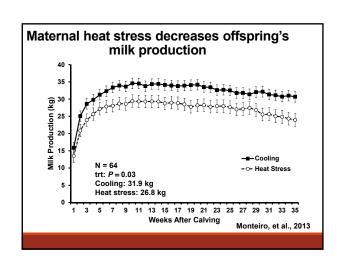








		Cc	oling			Heat	stress		P
Parameter	ΑI	IVF	Total	%	AI	IVF	Total	%	Trt
Bull calves, n	30	1	31		28	2	30		
Heifer calves, n	29	12	41		29	15	44		
DOA ⁴	0	0	0	0.0	2	1	3	4.1	0.2
Males mortality by 4 mo of age	1	0	1	3.2	3	0	3	10.0	0.3
Heifers leaving herd before puberty	1	4	5	12.2	3	7	10	22.7	0.2
Due to sickness, malformation or growth retardation	1	0	1	2.4	3	5	8	18.2	0.03
Heifers leaving herd after puberty, before first lactation	1	0	1	2.4	3	0	3	6.8	0.63
Heifers completing first lactation	27	8	35	85.4	22	7	29	65.9	0.0



Summary – Heat stress during the dry period on calf

- ☐ Impairs fetal growth and lowers birth weight
- ☐ Compromises immune function before weaning
- ☐ Decreases milk production in the first lactation







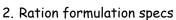
Goals of Feed Sampling/Analysis

- 1. Getting the right number
 - Value that approximates the mean over at least several days



- 2. Getting an estimate of variance
 - Why should you care?

1. Economic value of feeds

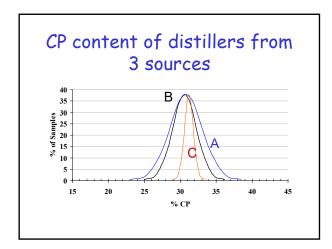


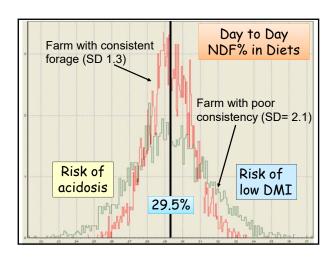


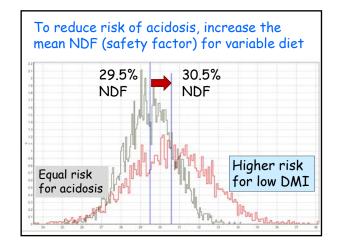
3. Risk management

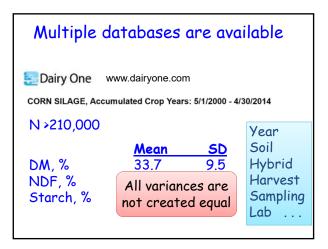


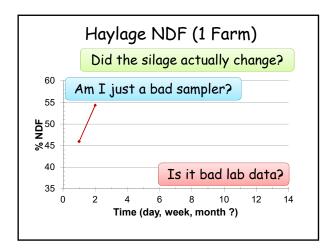
Why do we care about SD?

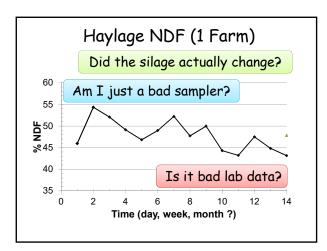


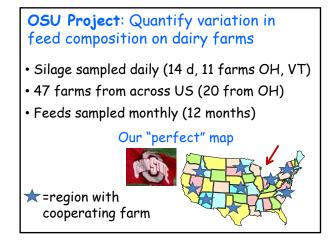


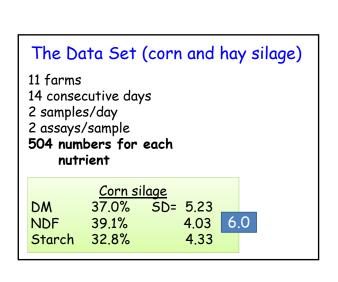


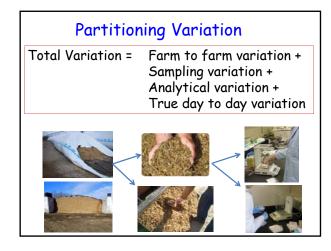


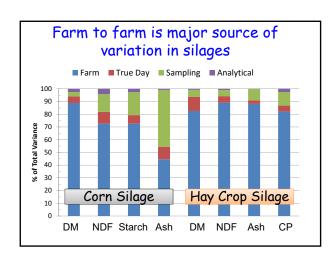










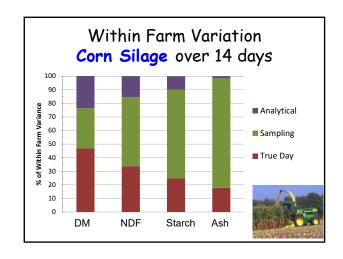


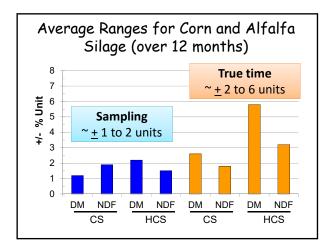


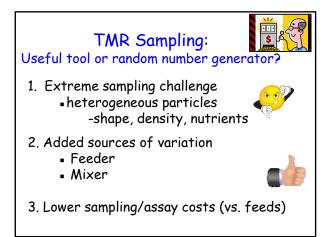
- 1. You need to sample silage from each
- 2. Don't use a book value
- 3. But this is not true for all feedstuffs

Sampling Non-Forages on Farms All wet feeds tested Farm was significant WCGF, WBG, WDG source of variation HM corn Dry corn, SBM, DCGF Farm was NOT a canola meal, whole significant source cottonseed of variation Farm was OFTEN not an **DDGS** important source of variation

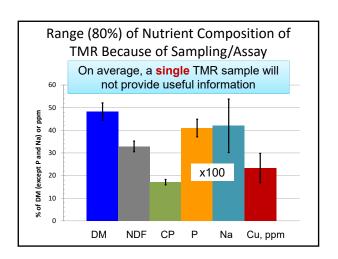
Within Farm SD (14 days) Variation is still large					
Nutrient	Corn silage		Haycrop Silage		
	Mean	SD	Mean	SD	
DM, %	37.0	1.7	41.7	3.3	
NDF, %	39.1	2.1	49.9	2.2	
Starch, %	32.8	2.3*			
CP, %	7.6	0.3	16.3	1.0	
* On 5 out o			ch would t	oe	











How do you reduce sampling error (or how do you reduce its impact)?

1. Use good sampling technique



2. Take duplicate samples



Good Sampling Practices

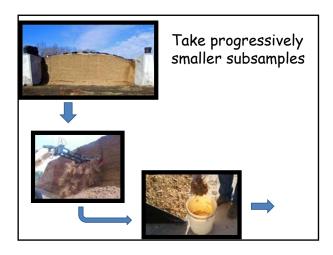
1. Mix as much as possible BEFORE sampling

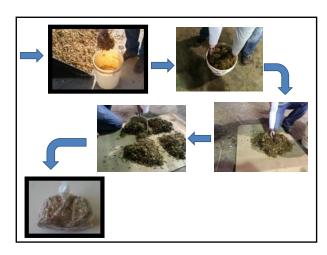


VS.

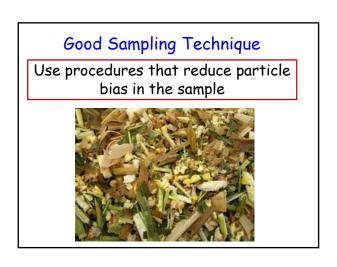


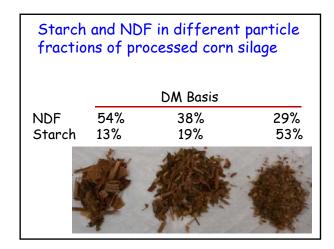
- 2. Take progressively smaller subsamples
- 3. Use good handling procedures
- 4. Develop SOP for sampling
- 5. Evaluate SOP by multiple samples





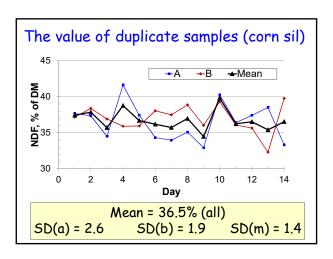


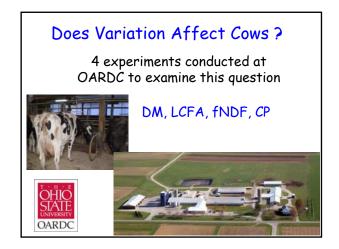


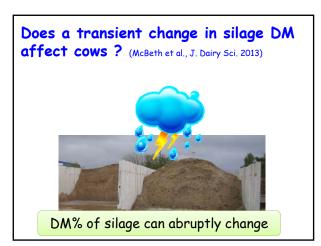


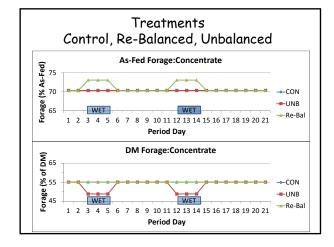




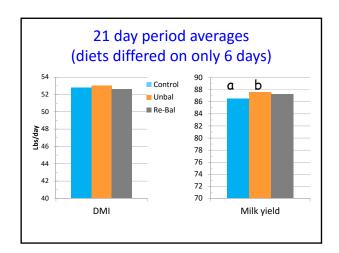


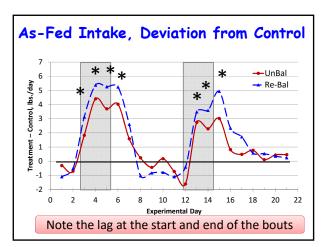


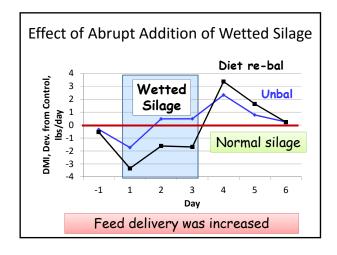




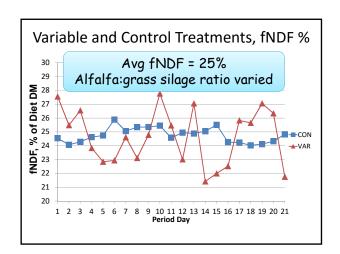
	CON	UNB	Re-BAL
DM%	66.2	63.9	60.7
fNDF%	23.6	21.0	23.6
Starch%	28.4	30.4	28.4
CP%	14.8	14.7	14.8

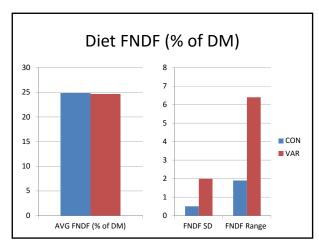


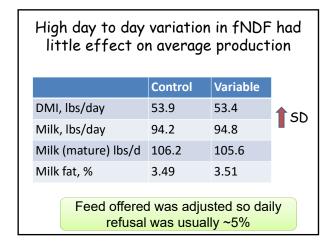


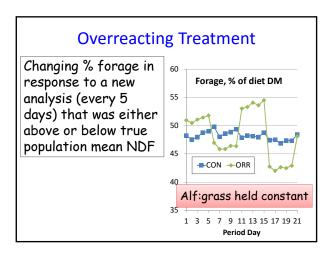




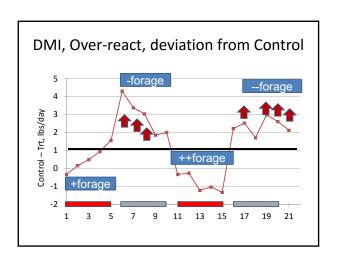


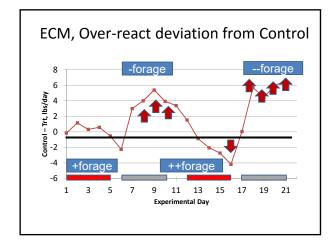














Conclusions



- 1. Sampling is a substantial source of within farm variation in silages and TMR
- 2. High sampling error = low confidence in single sample: USE MEANS!
- 3. Time can be important source of variation
 - know how much your feeds vary
 - don't over-smooth
 - don't change too quickly

Diet Variation in Cows

Substantial, short term variation (DM, fat, CP, fNDF) did not affect cows when cows were allowed to eat

Take Home Message

Increase feed delivery rates when you suspect high day to day variation in diet composition

Diet Variation in Cows

Longer term (>2 days) feeding of unbalanced diet has affected cows

Take Home Message

Before re-formulating, make sure the feeds really have changed but don't wait too long

