

Chapter 3

ANIMAL FOOD SAFETY HAZARDS



This chapter will focus on types of hazards potentially associated with animal food and will provide background information that will be useful during the hazard identification process.

Animal Food Safety Hazards Objectives

In this module, you will develop:

- An understanding of what to consider during hazard analysis.
- The ability to recognize that hazards vary among animal species.
- An awareness of potential biological, chemical (including radiological), and physical hazards in animal food.



In this module, participants will develop: 1) an understanding of what should be considered during hazard analysis; 2) the ability to recognize that hazards vary among animal species; 3) and an awareness of potential biological, chemical (including radiological), and physical hazards in animal food.

21 CFR 507.33 – Hazard Analysis

- *(a)(1) You must conduct a hazard analysis to identify and evaluate, based on experience, illness data, scientific reports, and other information, known or reasonably foreseeable hazards for each type of animal food manufactured, processed, packed, or held at your facility to determine whether there are any hazards requiring a preventive control; and*
- *(2) The hazard analysis must be written regardless of its outcome.*



The Hazard Analysis section begins on page 56345 of Appendix 1. Specifically, *You must conduct a hazard analysis to identify and evaluate, based on experience, illness data, scientific reports, and other information, known or reasonably foreseeable hazards for each type of animal food manufactured, processed, packed, or held at your facility to determine whether there are any hazards requiring a preventive control; and the hazard analysis must be written.*

The majority of the hazard analysis requirements, including additional hazard evaluation components, will be covered in Chapter 5: Hazard Analysis and Preventive Controls Determination. For this chapter, the focus is on the fact that a hazard analysis must be conducted to identify known or reasonably foreseeable hazards for each type of animal food manufactured, processed, packed, or held at a facility. This first step of a hazard analysis narrows down an entire universe of hazards to those that are known or reasonably foreseeable.

21 CFR 507.33 – Hazard Analysis

- *(b) The hazard analysis must consider:*
 - *(1) Known or reasonably foreseeable hazards that include:*
 - *(i) Biological hazards, including microbiological hazards such as parasites, environmental pathogens, and other pathogens;*
 - *(ii) Chemical hazards, including radiological hazards, substances such as pesticide and drug residues, natural toxins, decomposition, unapproved food or color additives, and nutrient deficiencies or toxicities (such as inadequate thiamine in cat food, excessive vitamin D in dog food, and excessive copper in food for sheep); and*
 - *(iii) Physical hazards (such as stones, glass, and metal fragments); and*



Hazard analysis involves the identification and further evaluation of hazards. Potential hazards in animal food will be classified into three broad categories: biological hazards, chemical hazards, and physical hazards. The regulation provides examples for each of these categories, but this is not an exhaustive list of all known or reasonably foreseeable hazards. The regulation specifically draws out that some hazards are more relevant in one species compared to another. A key takeaway is that when considering hazards, it is important to consider the manufacturing environment and the species for which the animal food is intended.

21 CFR 507.33 – Hazard Analysis

- (2) *Known or reasonably foreseeable hazards that may be present in the animal food for any of the following reasons:*
 - (i) *The hazard occurs naturally;*
 - (ii) *The hazard may be unintentionally introduced; or*
 - (iii) *The hazard may be intentionally introduced for purposes of economic gain.*



Finally, the hazard analysis must consider *known or reasonably foreseeable hazards that may be present in the animal food for any of the following reasons: 1) the hazard occurs naturally; 2) the hazard may be unintentionally introduced; or 3) the hazard may be intentionally introduced for purposes of economic gain.*

21 CFR 507.3 – Definition: “Hazard”

- *Any biological, chemical (including radiological), or physical agent that has the potential to cause illness or injury in humans or animals.*



Because this is a chapter about hazards, it is appropriate to introduce the definition of hazard found in 21 CFR 507.3, which can be found on page 56338 of Appendix 1. A hazard means *any biological, chemical (including radiological), or physical agent that has the potential to cause illness or injury in humans or animals.*

A key part of this definition is that it specifies an agent can be a hazard if it causes illness or injury in humans **or** animals. The hazard analysis must consider those hazards that may potentially impact human health due to their role in handling animal food or the edible products (meat, milk, eggs) from animals consuming the animal food. However, the hazard analysis must also consider the impact on the animal itself. For this reason, some hazards for animal food may be different than those for human food. While human food is only required to consider hazards for a single species (humans), the hazard analysis for animal food often requires the consideration for multiple animal species and humans who may be impacted.

21 CFR 507.3 – Definition:

“Known or Reasonably Foreseeable Hazard”

- *A biological, chemical (including radiological), or physical hazard that is known to be, or has the potential to be, associated with the facility or the animal food.*



The definition for a *known or reasonably foreseeable hazard* is found on page 56339 of Appendix 1. This is a further classification of a hazard. Distinction between this term and the term *hazard* is key in the hazard identification and evaluation process that is discussed throughout this chapter. A *known or reasonably foreseeable hazard* is “a biological, chemical (including radiological), or physical hazard that is known to be, or has the potential to be, associated with the facility or the animal food.” The critical component of the definition is the known or potential association with the facility or the animal food.

21 CFR 507.3 – Definition: *“Hazard Requiring a Preventive Control”*

- A known or reasonably foreseeable hazard for which a person knowledgeable about the safe manufacturing, processing, packing, or holding of animal food would, based on the outcome of a hazard analysis (which includes an assessment of the severity of the illness or injury to humans or animals if the hazard were to occur and the probability that the hazard will occur in the absence of preventive controls), establish one or more preventive controls to significantly minimize or prevent the hazard in an animal food and components to manage those controls (such as monitoring, corrections or corrective actions, verification, and records) as appropriate to the animal food, the facility, and the nature of the preventive control and its role in the facility’s food safety system.



Once a facility has identified a *known or reasonably foreseeable hazard*, the next step of the hazard analysis process is to determine if the hazard is a *hazard requiring a preventive control*. The first key component of this long definition is that the determination is to be made by “a person knowledgeable about the safe manufacturing, processing, packing, or holding of animal food...” This fits the definition of a Preventive Controls Qualified Individual.

Next, the definition calls out that the establishment of preventive controls is dependent upon “an assessment of the severity of the illness or injury to humans or animals if the hazard were to occur and the probability that the hazard will occur in the absence of preventive controls.” Possible methods to assess severity and probability are described in chapter 5.

The definition goes on to clarify that the hazard can be controlled by either one or multiple preventive controls, which either “significantly minimize or prevent the hazard in animal food.” Finally, the definition states that a *hazard requiring a preventive control* has necessary “components to manage those controls.” There is flexibility as the management components are as appropriate to the animal food, the facility, and the nature of the preventive control and its role in the facility’s food safety system.

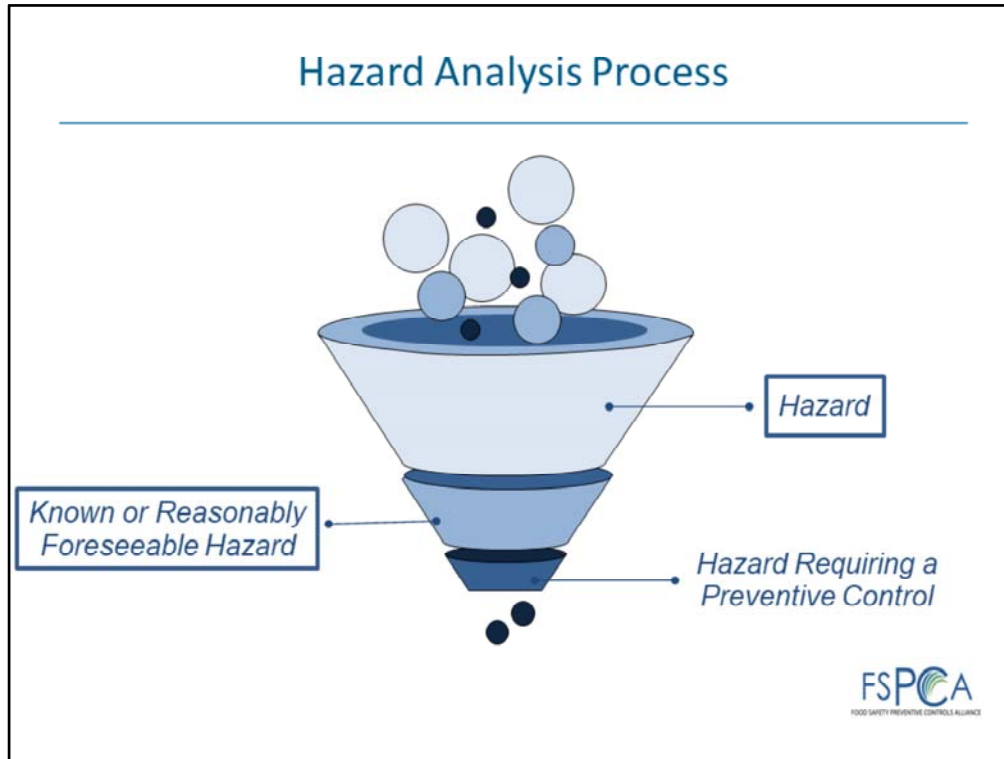
21 CFR 507.3 – Definition: *“Preventive Controls”*

- *Those risk-based, reasonably appropriate procedures, practices, and processes that a person knowledgeable about the safe manufacturing, processing, packing, or holding of animal food would employ to significantly minimize or prevent the hazards identified under the hazard analysis that are consistent with the current scientific understanding of safe food manufacturing, processing, packing, or holding at the time of the analysis.*



Preventive Controls are those risk-based, reasonably appropriate procedures, practices, and processes that a person knowledgeable about the safe manufacturing, processing, packing, or holding of animal food would employ to significantly minimize or prevent the hazards identified under the hazard analysis that are consistent with the current scientific understanding of safe food manufacturing, processing, packing, or holding at the time of the analysis.

Preventive controls can be categorized by the method employed to control the hazard: process controls (which mitigate hazards through an action during the process itself), sanitation controls (which mitigate hazards through active sanitation procedures to prevent cross-contamination), supply-chain-applied controls (which requires control of the hazard at the supplier level), or other controls (which control hazards through different means other than those previously specified). There will be more discussion of the types of preventive controls and their required management components in the next chapters.



As can be seen, there are many definitions for the various categories of hazards. This slide graphically depicts the hazard analysis process. The process starts with the most general category of hazards – those that have the potential to cause illness or injury to humans or animals. Then, the hazard category gets narrowed to those hazards that are known or reasonably foreseeable based on the types of animal food the facility manufactures, processes, packs or holds. Finally, the combination of severity and probability are considered when further refining hazards to those that require a preventive control. Hazards requiring a preventive control are those that must be significantly minimized or prevented with preventive controls.

This chapter will focus on hazards, and identifying which hazards are known or reasonably foreseeable in different types of animal food. The determination if they require a preventive control will be described fully in Chapter 5: Hazard Analysis and Preventive Controls Determination.

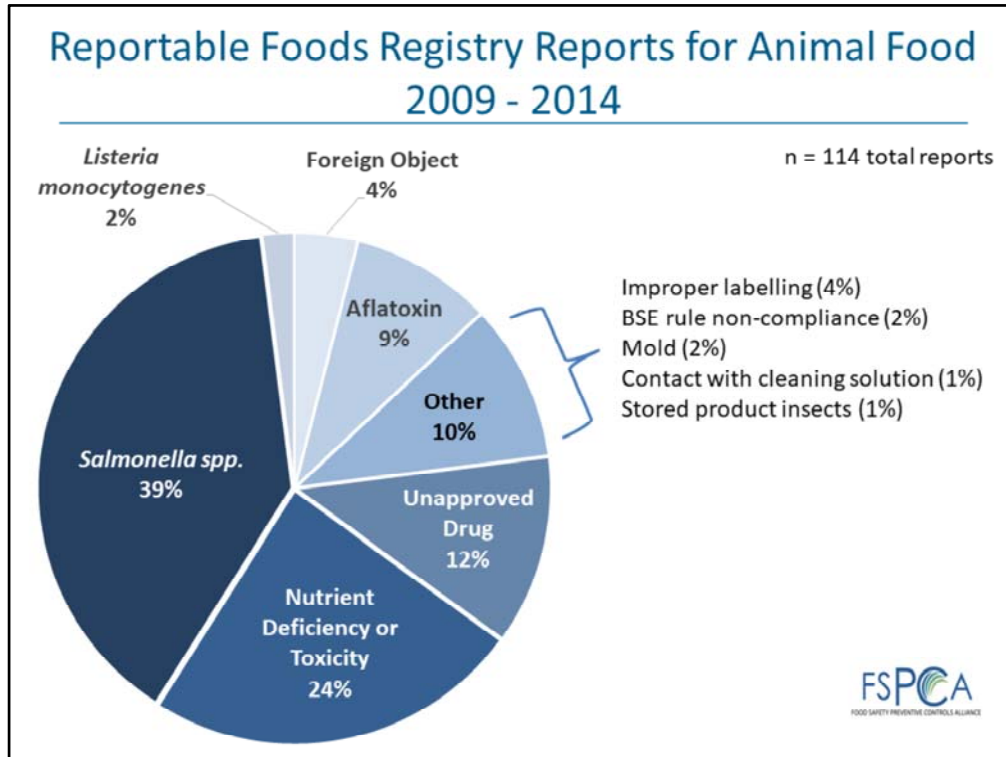
Hazard Does Not Necessarily Refer To:

- Violations of regulatory standards not directly related to food safety or covered by other regulations, such as
 - Labeling requirements
 - Economic fraud
- Undesirable situations not involving a hazard, such as product quality



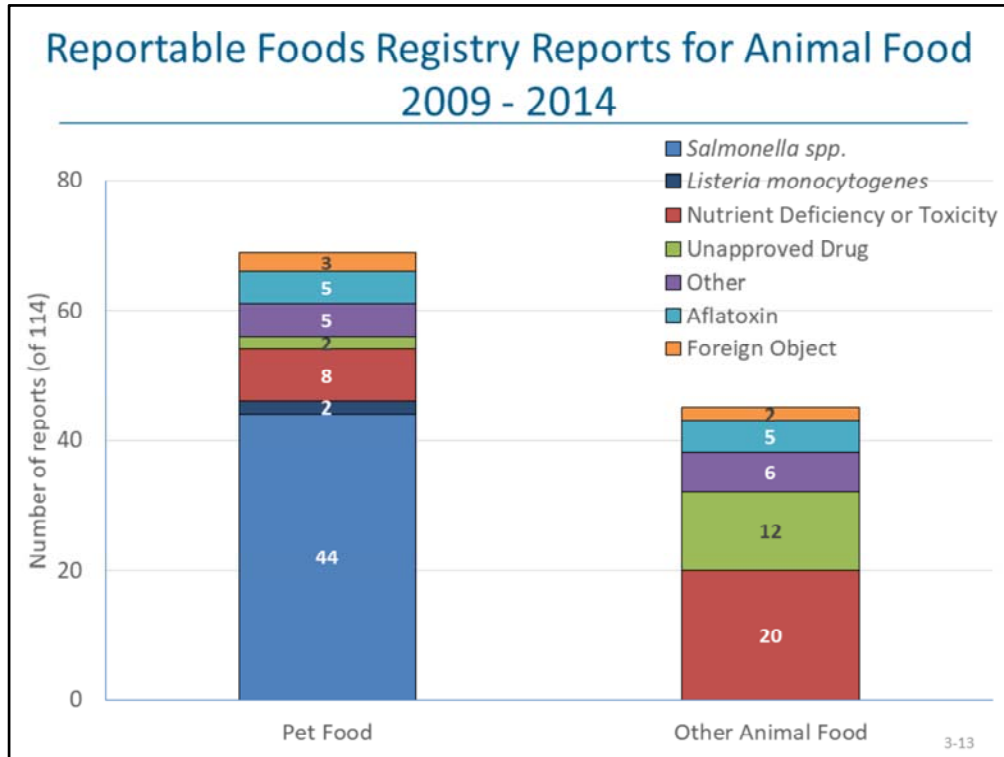
As participants reflect on the hazard definition, it is important to understand that there are some animal food regulations that will not be discussed thoroughly in this curriculum because they are not likely to lead to food safety concerns. For example, there are specific labeling requirements for both medicated and non-medicated animal foods. These labeling requirements must be met in accordance with various rules, but in some cases, mislabeling or economic fraud is not considered a food safety concern. One such instance is if an ingredient manufacturer intentionally mislabels chicken by-product meal as duck meal because the two have similar nutrient profiles and duck meal commands a higher price. In this case, the mislabeling is economic fraud and is a regulatory violation of other rules, but does not necessarily constitute a hazard within the *Preventive Controls for Animal Food* rule. Conversely, mislabeling beef meal as pork meal may be considered a hazard if it is sold to a ruminant feeder who then feeds it to beef cattle in violation of the Bovine Spongiform Encephalopathy (BSE) rule.

Furthermore, there are occasional examples where undesirable situations are not necessarily hazards, such as poor product quality. For example, a pelleted goat food manufacturer may not properly cool pellets after thermal processing and prior to packaging. As a result, the product may exhibit poor pellet quality, but would not cause potential illness or injury to humans or animals, and would therefore not meet the definition of a hazard.



When beginning the hazard analysis process, it is helpful to understand the types of hazards that have previously been associated with the types of animal food that are manufactured, processed, packed, or held at your facility. A good resource for this data is the Reportable Food Registry, or RFR. This is an electronic portal to which facilities required to register as a food facility with FDA must report if there is a reasonable probability that the use of, or exposure to, animal food will cause **Serious Adverse Health Consequences or Death to Humans or Animals**. These are often abbreviated as SAHCODHA hazards. Since its inception, there have been five annual reports published at the time of this curriculum's development: 2009-2010, 2010-2011, 2011-2012, 2012-2013, and 2013-2014, which can be found on the FDA website.

There were a total of 114 RFR reports for animal food from 2009-2014. Thirty-nine percent of all RFR reports for animal food during this time were due to *Salmonella* contamination. Other major reporting categories included nutrient deficiencies or toxicities (24%), unapproved drug contamination (12%), aflatoxin (9%), and foreign objects, such as metal or glass (4%). *Listeria monocytogenes* contamination also resulted in 2% of RFR reports. All the remaining RFR reports, such as improper labeling, non-compliance with BSE regulations, mold, cleaning solution contamination, or pest activity, totaled 10%. An understanding of the total scope of RFR reports is helpful to prioritize focus during hazard analysis.



This slide shows the same data, but broken down by the numerical occurrence of RFR reports associated with either pet food or other animal food. As participants can see, all the *Salmonella spp.* and *Listeria monocytogenes* RFR reports were associated with pet food, and microbial hazards were responsible for 67% of all RFR reports in pet food. Part of the reason for the greater proportion of *Salmonella spp.* reports in pet food is its potential implications on human health, which is described more fully later in the chapter. Conversely, either nutrient deficiencies or toxicities or unapproved drug contamination accounted for 70% of the other animal food hazards. The RFR reports can be evaluated by breaking down those hazards associated with specific animal species. For example, sheep food was associated with six total RFR reports during these years. Of those, five were due to copper toxicity and one to unapproved drug contamination.

While the RFR annual reports are useful, there are many other resources to consider when identifying hazards. For example, *Listeria monocytogenes* was not reported in the RFR reports until the 2013-2014 annual report, which was published in May 2016. However scientific research reported *Listeria monocytogenes* in raw, fresh, and frozen pet food as early as 2014 and a firm recalled selected lots of pet food in May 2014 for the hazard. Other resources, such as scientific literature, industry whitepapers, and guidance for industry are available and are important to consider. Those resources and others are discussed in more detail during the hazard

identification and evaluation section of Chapter 5: Hazard Analysis and Preventive Controls Determination.

Example Hazards in Animal Foods

- **Biological hazards:**
 - **Bovine Spongiform Encephalopathy**
 - *Salmonella* spp.
 - *Listeria monocytogenes*
- **Chemical hazards:**
 - Mycotoxins
 - Pesticides and process-related or industrial chemicals
 - Drug carryover
 - Nutrient deficiencies or toxicities
- **Physical hazards:**
 - Stones
 - Glass
 - Metal



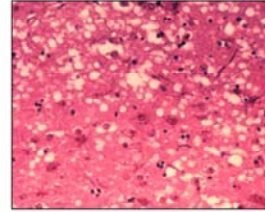
The *Preventive Controls for Animal Food* rule discusses the three categories of hazards and examples of each. This list of hazard examples in animal foods is based on the examples in the rule, RFR reports, scientific literature, and other resources.

Specifically, biological hazards can include agents such as Bovine Spongiform Encephalopathy (BSE) or undesirable microorganisms, such as *Salmonella* spp. and *Listeria monocytogenes*. Chemical hazards can include mycotoxins, pesticides, process-related or industrial chemicals, drug carryover, and nutrient deficiencies and toxicities. Finally, physical hazards can include stones, glass, and metal.

In the next section, each of these hazard categories are discussed more fully, starting with the biological hazards.

Biological Hazards in Animal Foods

- Bovine Spongiform Encephalopathy (BSE) is a type of transmissible spongiform encephalopathy (TSE) that is a degenerative, neurological disease.
 - Can be transmitted via animal food
 - Long incubation period
- Rules established by FDA in 1997 and 2008:
 - Prohibit feeding of most mammalian proteins to ruminants
 - Prohibit feeding of high risk cattle materials to all animals
 - Prevent contamination during transport and manufacturing practices
- The US is recognized as having a negligible BSE risk



Sources: 21 CFR 589.2000 and 21 CFR 589.2001
World Organisation for Animal Health Resolution No. 20

Bovine Spongiform Encephalopathy (BSE) is a type of transmissible spongiform encephalopathy (TSE) that has occurred in US cattle. Other TSEs, such as Scrapie in sheep or transmissible mink encephalopathy also exist. BSE can be transmitted through animal food, as was observed in the late 1980s and early 1990s in the United Kingdom through the use of rendered bovine proteins in cattle feed. Incubation periods for the disease can be months to several years.

To control BSE, the FDA published 21 CFR 589.2000 in 1997 that prohibits the use of most mammalian protein in animal food intended for ruminant animals, such as cattle, sheep, and goats. These rules were strengthened in 2008, when FDA published 21 CFR 589.2001 prohibiting the use of specified risk material, such as brains and spinal cords from cattle older than 30 months of age, in all animal food. The rules also contain measures to prevent contamination during manufacturing or transportation.

Due to the implementation of these rules and limited BSE occurrence, the World Organisation for Animal Health characterized the United States of America as having a negligible BSE risk in 2016.

Biological Hazards in Animal Foods

- According to the FDA Compliance Policy Guide Sec. 690.800 *Salmonella* in Food for Animals:
 - *Salmonella* spp.
 - Can cause salmonellosis when the pathogen is consumed by humans.
 - Animal foods that are contaminated with *Salmonella* are higher risk for causing illness if they come in direct contact with humans
 - *Salmonella*-contaminated animal food can cause illness in animals that consume the food.
 - Depends on the serotype



Source: FDA Compliance Policy Guide Sec. 690.800 *Salmonella* in Food for Animals

3-16

Salmonella is a bacterium that may cause salmonellosis when the pathogen is consumed. It thrives in warm, humid environments, but can survive in low-moisture situations. Because of this, dehydrated or freeze-dried ingredients or finished foods may be contaminated when they are rehydrated.

In humans, symptoms of salmonellosis include nausea, vomiting, abdominal cramps, minimal diarrhea, fever, and headache. Certain vulnerable populations, such as children, the elderly, and individuals with compromised immune systems, are particularly susceptible to acquiring salmonellosis from pet food, and may experience more severe symptoms. *Salmonella* also has widespread occurrence in animals, especially poultry and swine. Animals may be infected either clinically, where they show symptoms similar to those in humans, or asymptotically but are still at a potential for shedding and spreading the bacteria.

The role of *Salmonella* in animal food as a potential hazard to both humans and animals is described in the FDA Compliance Policy Guide Sec. 690.800: *Salmonella* in Food for Animals. It describes that certain animal foods, such as pet food, pose a high risk to human health when they are contaminated with *Salmonella* because they are direct human contact foods. This means that there is a high likelihood that humans will come in direct contact with these foods, such as through direct ingestion by people or from hands or utensils that are contaminated when feeding

pets. *Salmonella*-contaminated animal food can cause illness in animals that consume that food. Whether *Salmonella* causes illness in an animal depends on the serotype. A serotype is a further classification of a broad species of bacteria. For example, there are more than 2,500 different serotypes of *Salmonella* that differ from one another by small variations in structure and function. Those serotypes that cause disease in a particular species are referred to as pathogenic for that animal species.

Biological Hazards in Animal Foods

- *Salmonella* spp.
 - Pet food is adulterated when contaminated with *Salmonella* and will not subsequently undergo a commercial heat step or other commercial process
 - Animal food is adulterated when contaminated with a *Salmonella* serotype that is considered to be pathogenic to the animal intended to consume the animal food and the animal food will not subsequently undergo a commercial heat step or other commercial process



Source: FDA Compliance Policy Guide Sec. 690.800 *Salmonella* in Food for Animals

Salmonella serotype differentiation is important. FDA considers a pet food or a pet food ingredient to be adulterated when it is contaminated with any serotype of *Salmonella* and will not undergo a commercial heat step that will kill the *Salmonella*. This is partially because pet food is a direct human contact food.

Alternatively, FDA considers other animal food to be adulterated only when it is contaminated with a *Salmonella* serotype considered to be pathogenic to the animal species intended to consume the animal food. Unlike pet foods, the majority of food for other animals is not thermally-processed. When it is, the intent of the process is typically to improve nutrient availability to the animal or other quality aspects of the animal food by pelleting, extruding, or expanding the product. Thus, thermal processing in most foods for other animals is not intended as a *Salmonella* control step.

Biological Hazards in Animal Foods

- *Salmonella* spp.
 - Current examples of animal foods and the pathogenic *Salmonella* serotypes that have been associated with disease in the particular animal species consuming these foods:
 - Poultry food with *Salmonella* Pullorum, *Salmonella* Gallinarum, or *Salmonella* Enteritidis
 - Swine food with *Salmonella* Choleraesuis
 - Sheep food with *Salmonella* Abortusovis
 - Horse food with *Salmonella* Abortusequi
 - Dairy and beef food(s) with *Salmonella* Newport or *Salmonella* Dublin



Source: FDA Compliance Policy Guide Sec. 690.800 *Salmonella* in Food for Animals

The Compliance Policy Guide lists current examples of animal foods and the pathogenic *Salmonella* serotypes that have been associated with disease in the particular animal species consuming these animal foods. While these are currently the listed serotypes, FDA stipulates that all other *Salmonella* serotypes should be evaluated on a case-by-case basis.

Biological Hazards in Animal Foods

- *Listeria monocytogenes*
 - Recently identified in raw, fresh, and frozen pet food
 - Nemser et al., 2014
 - 196 raw dog and cat foods sampled
 - 16.3% of samples positive for *L. monocytogenes*



Depiction of a *L. monocytogenes*



L. monocytogenes is unique in that it can survive in both the presence and absence of oxygen. The bacteria can grow and proliferate in frozen and refrigerated environments. Listeriosis in animals may result in swelling of the brain, neurological-related circling, and late-term abortions.

The 2013-2014 annual RFR report was the first to identify *Listeria monocytogenes* presence in raw, fresh, and frozen pet foods. Since then, recalls associated with this undesirable microorganism have increased. Furthermore, a peer-reviewed research paper published in 2014 demonstrated that 16.3% of the 196 raw cat and dog foods sampled were positive for the pathogen. This recent addition of a biological hazard as a known or reasonably foreseeable hazard for some pet foods underscores that reanalysis of the hazard identification and evaluation may be necessary as new information becomes available.

Example Hazards in Animal Foods

- **Biological hazards:**
 - Bovine Spongiform Encephalopathy
 - *Salmonella* spp.
 - *Listeria monocytogenes*
- **Chemical hazards:**
 - **Mycotoxins**
 - **Pesticides and process-related or industrial chemicals**
 - **Drug carryover**
 - **Nutrient deficiencies or toxicities**
- **Physical hazards:**
 - Stones
 - Glass
 - Metal



While biological hazards were most associated with pet foods, chemical hazards were responsible for majority of the RFR reports in other animal foods. Chemical hazards can include radiological hazards. This curriculum does not cover radiological hazards in depth because they are not likely to be known or reasonably foreseeable in most regions. More common chemical hazards include substances such as pesticides, drug carryover, natural toxins, decomposition, unapproved food or color additives, and nutrient deficiencies or toxicities. Specific hazards discussed here include mycotoxins, chemical contamination from pesticides and process-related or industrial chemicals, drug carryover, and nutrient deficiencies or toxicities. However, it should be recognized that chemical hazards can vary widely and certainly may extend to examples not discussed in this chapter.

Chemical Hazards in Animal Foods

- The presence of chemical hazards in animal foods may be:
 - **Naturally-occurring**
 - Mycotoxins
 - Unintentionally-introduced
 - Pesticides and process-related or industrial chemicals
 - Drug carryover
 - Nutrient deficiencies or toxicities
 - Intentionally-introduced for purposes of economic gain
 - Melamine



The hazard analysis process must consider known or reasonably foreseeable hazards that may be present. Examples of hazards that are naturally occurring, unintentionally introduced, and intentionally introduced for purposes of economic gain are shown above. These reasons for introduction must be considered for all hazards, regardless if they are biological, chemical, or physical in nature.

Mycotoxins are an example of a hazard that occurs naturally and will be discussed in more detail in the next four slides.

Naturally-Occurring Chemical Hazards in Animal Foods

- Mycotoxins
 - Specific growing conditions (cool/wet or hot) in some grains encourage the growth of various mold species.
 - Some molds, such as aspergillus and fusarium, occasionally produce mycotoxins during specific environmental conditions.
 - Mycotoxins can cause serious illness in humans and animals at very low dosages.
 - Severity depends upon animal physiology, phase of production.



Source: Mycotoxins: Risks in Plant, Animal, and Human Systems. CAST Task Force Report 2003.

Mycotoxins are naturally-occurring hazards that are a result of specific growing conditions encouraging mold growth in different grains. Some molds, such as aspergillus spp. and fusarium spp., occasionally produce mycotoxins during specific environmental conditions. While these molds may be present without producing mycotoxins, their growth and production of the toxin occurs with specific temporal conditions. For example, fusarium molds that produce zearalenone and deoxynivalenol are more likely to occur during cool, wet conditions, while aspergillus molds that produce aflatoxin are more likely to occur in hot environments. Mycotoxins can cause serious illness in humans and animals at very low dosages. The severity of illnesses depends upon the type of mycotoxin present and the animal's physiology. The types of illnesses that may result from these toxins are discussed next.

Naturally-Occurring Chemical Hazards in Animal Foods

- Mycotoxins
 - Aflatoxin
 - DON
 - Fumonisin
 - Ochratoxin A
 - T-2/HT-2
 - Zearalenone



Aspergillus mold on corn

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

There are several different types of mycotoxins, and the severity of illnesses they cause may vary depending upon their concentration and the animal consuming the animal food. Common types of mycotoxins and the raw agricultural commodity they are most commonly found in:


- Aflatoxin is commonly found in peanuts, corn, wheat, cottonseed, and nuts.
- Deoxynivalenol, or DON, is sometimes called vomitoxin and is most commonly found in corn, wheat, barley, and oats.
- Fumonisin is most commonly found in corn, wheat, sorghum, barley, and oats.
- Ochratoxin A is most commonly found in wheat, barley, oats, corn, and dry beans.
- T-2, which rapidly metabolizes to HT-2, is found most commonly in barley, wheat, and oats.
- Zearalenone is commonly found in corn, wheat, barley, and rye.

Most recalls and RFR reports have been associated with aflatoxin due to its frequency of occurrence and severity of illness, which is why it is focused on the most during this chapter.

Naturally-Occurring Chemical Hazards in Animal Foods

- Mycotoxins
 - Aflatoxin (corn, peanut products)
 - Can be transmitted through milk, meat, and eggs to humans
 - Highly carcinogenic
 - In animals, causes mortality, decreased weight gain and egg/milk production

FDA Action Limits for Aflatoxin		
Level	Ingredient	Animal
300 ppb	Corn or Peanut Products	Finishing Beef Cattle
300 ppb	Cotton Seed Meal	Beef Cattle, Swine, Poultry
200 ppb	Corn or Peanut Products	Finishing Swine (100 lb BW or greater)
100 ppb	Corn, Peanut Products, Other Animal Foods	Breeding Beef Cattle, Breeding Swine, Mature Poultry
20 ppb	Corn, Peanut Products, Other Animal Foods	Immature Animals and Others Not Listed


FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

Source: FDA Compliance Policy Guide Sec. 683.100 Action Levels for Aflatoxins in Animal Feeds

Aflatoxins may cause different levels of illness within different animal species and within different production stages of the same species. Aflatoxin's implications in human health mark its severity. For example, aflatoxins may cause organ failure and mortality in some animal species, such as dogs and cats, while others may experience less severe symptoms, such as depressed milk production in dairy cows. However, aflatoxin can be transmitted from the animal food through milk, meat, and eggs. This is concerning because aflatoxin is one of the most potent naturally-occurring carcinogens known to man. The danger of this toxin to both human and animal health has resulted in the FDA setting levels for the toxin in different types of animal food. These levels are described in the FDA Compliance Policy Guide Sec. 683.100 Action Levels for Aflatoxins in Animal Feeds. If an animal food has an aflatoxin concentration above that outlined for an intended animal species, the FDA may take regulatory action.

The animal's phase of production and physiology may affect how aflatoxin is metabolized, and thus its impact on illness or injury to humans or animals. Therefore, there are different action levels for different species and production phases. The specific levels from the Compliance Policy Guide are listed above. For example, the action level for corn and peanut products intended for finishing beef cattle is 300 parts per billion (ppb), while the action level for immature animals and other animals, such as dairy cattle and pets, is just 20 ppb.

Naturally-Occurring Chemical Hazards in Animal Foods

- **Mycotoxins**
 - **Deoxynivalenol/DON/Vomitoxin**
 - Vomiting, diarrhea, feed refusal, decreased milk production
 - **Fumonisin**
 - Feed refusal, ELEM (equine leukoencephalomalacia)
 - **Ochratoxin A**
 - Mortality, decreased weight gain, and poor egg production/quality
 - **T-2/HT-2**
 - Mortality, infertility
 - **Zearalenone**
 - Estrogenic effects in swine, embryonic death, inhibition of fetal development



Source: Mycotoxins: Risks in Plant, Animal, and Human Systems. CAST Task Force Report 2003.

There are also FDA advisory or guidance levels for other mycotoxins, but they are less stringent than those for aflatoxin. Still, those mycotoxins may have dramatic impacts on animal health, such as:

- Deoxynivalenol concentrations above threshold levels may result in vomiting, diarrhea, animal food refusal, and decreased milk production in animals.
- Horses are particularly susceptible to fumonisins, as they can lead to equine leukoencephalomalacia, or ELEM. Because horses cannot metabolize the toxin well, concentrations greater than 2 parts per million (ppm) in food for horses may cause drowsiness, blindness, circling, staggering, and death within 48 to 72 hours. Fumonisin can also cause animal food refusal.
- Ochratoxin A is known to result in mortality and decreased weight gain in many animals, as well as poor egg production and poor egg quality in layer chickens.
- T-2/HT-2 described earlier can lead to mortality and infertility in certain species.
- Zearalenone has been associated with estrogenic effects that lead to embryonic death and the inhibition of fetal growth, as well as infertility. These symptoms are most commonly observed in swine, but can occur in other species.

The type and concentration of a mycotoxin – as well as its interaction within each animal species – impact the likeliness for its consideration as a hazard. The hazard analysis must consider temporal conditions, particularly in the case for mycotoxins, as their presence may change due to geographical location and annual

environmental conditions.

Chemical Hazards in Animal Foods

- The presence of chemical hazards in animal foods may be:
 - Naturally-occurring
 - Mycotoxins
 - **Unintentionally-introduced**
 - Pesticides and process-related or industrial chemicals
 - Drug carryover
 - Nutrient deficiencies or toxicities
 - Intentionally-introduced for purposes of economic gain
 - Melamine



While mycotoxins are an example of chemical hazards that are naturally occurring, some hazards are unintentionally-introduced by humans or the manufacturing process. These include pesticides and process-related or industrial chemicals, drug carryover, and nutrient deficiencies or toxicities.

Unintentionally-Introduced Chemical Hazards in Animal Foods

- Pesticides and other chemical residues
 - Polychlorinated biphenyls, dioxins, process-related chemicals, chlorinated pesticides
 - Found in the environment and accumulate in fat tissue
 - FDA pesticide surveillance suggests very few animal food samples have pesticide levels that exceed permitted levels
 - Of 420 samples collected in FY 2013, 11 (2.6%) contained violative pesticide levels that exceeded an EPA tolerance or FDA action level (FDA Pesticide Monitoring Program Fiscal year 2013 Pesticide Report)



Pesticides may be introduced by direct contamination from facility pesticide programs, from contaminated grains, or from contamination of animal-based products due to tissue accumulation. Dioxins and process-related chemicals, such as chlorinated pesticides, are toxic industrial pollutants that may be found in the environment and accumulate in fat tissue. While these are all concerns, FDA pesticide surveillance suggests that a very small percentage of animal food have pesticide levels that exceed permitted levels. For example, of 420 animal food samples collected in fiscal year 2013, eleven contained violative pesticide levels that exceeded an EPA tolerance or FDA action level (FDA Pesticide Monitoring Program Fiscal year 2013 Pesticide Report).

Unintentionally-Introduced Chemical Hazards in Animal Foods

- Drug carryover
 - Monensin poisoning in horses
 - Drug approved for use in cattle and poultry food
 - Horses are extremely sensitive (2-3 mg/kg of body weight = death)
 - No antidote



A horse with monensin poisoning.
Note the edema around eye sockets.

Drug carryover is also a chemical hazard that is usually unintentionally introduced. All medicated animal foods must be manufactured and distributed in accordance with the Current Good Manufacturing Requirements that are found in 21 CFR Part 225. An example of a drug carryover hazard is monensin poisoning in horses. Monensin sodium is an animal drug approved for use in cattle and poultry. However, there have been instances of monensin contamination in food for horses, where it is very toxic with 2 to 3 mg per kg of body weight likely resulting in death. Early stages of monensin poisoning in horses include elevated heart rate, muscle wasting, and edema, or swelling, around the eyes. Because monensin sodium is so toxic to horses, particular care must be used when a facility manufactures food for horses and animal food containing monensin sodium. This may include procedures to minimize the carryover of monensin from one batch of animal food to the next, such as the use of sequencing or flushing procedures.

Unintentionally Introduced Chemical Hazards in Animal Foods

- Nutrient Deficiencies or Toxicities
 - Unlike human foods, animal food is typically intended to be fed as a sole source of nutrients
 - Some animals have particularly sensitive nutrient requirements, especially vitamins and minerals
 - Inadequate thiamine in cats
 - Excessive vitamin D in dogs
 - Excessive copper in sheep
 - Some animal food manufacturing processes may impact the stability of sensitive nutrients, especially vitamins



Other unintentionally-introduced chemical hazards may include nutrient deficiencies or toxicities. This is a hazard category that is unique to animal food because nutrient deficiencies or toxicities are a greater risk in animals than humans.

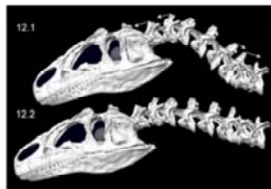
Consider this example: humans may reach their nutrient requirements through a variety of foods consumed throughout the day. For example, a person may choose to eat a serving of fruit, protein (eggs or bacon), and carbohydrate (toast) for breakfast, a salad full of nutritious vegetables and protein (chicken) for lunch, and have a dinner including a serving of protein (beef), carbohydrate (potatoes), dairy (glass of milk), and healthy fat (cheese).

Meanwhile, a single bag of animal food may be the single source of nutrients for an animal over a number of days or weeks. Therefore, it is essential that the diet be wholesome and safe – but also meet the animal's nutrient requirements.

Some animals have particularly sensitive nutrient requirements, especially to vitamins and minerals. For example, common nutrient deficiencies or toxicities that will be discussed are inadequate thiamine in cats, excessive vitamin D in dogs, and excessive copper in food for sheep. In addition to the animal's sensitivity to the nutrient, some animal food manufacturing processes may impact the stability of sensitive nutrients, such as vitamins, and lead to nutrient deficiencies.

Unintentionally Introduced Chemical Hazards in Animal Foods

- Inadequate thiamine in cat food
 - Thiamine is destroyed rapidly when subjected to heat and water.
 - Up to 90% of thiamine can be destroyed during the retort process in canning (DeNoya, 2015).
 - Thiamine is used as to maintain normal body processes in animals. Cats have a very high requirement, so short-term deficiency has substantial implications.
 - Ventriflexion/curled neck, seizure, death



Spinal curvature changes
from ventriflexion caused
by thiamine deficiency



Thiamine, sometimes referred to as vitamin B1, is a vitamin that is considered an essential nutrient for many animal species. Essential nutrients are ones that cannot be produced by the body and that must be supplied to an animal at a minimum level to maintain healthy bodily functions. Thiamine is an essential nutrient for cats.

Thiamine has been demonstrated to be rapidly destroyed when subjected to heat and water. These are environmental conditions common to the commercial processes for canned cat food production, and up to 90% of thiamine may be destroyed during the retort process of manufacturing canned cat food.

Thiamine deficiency in cats typically manifests itself as ventriflexion, or a curled neck as shown in the picture, followed by seizure and death. Careful maintenance and monitoring of thermal processing parameters are necessary to maintain maximum thiamine activity in cat food.

Unintentionally Introduced Chemical Hazards in Animal Foods

- Excessive vitamin D in dog food
 - The gut absorbs vitamin D in ratio with Ca
 - Excessive vitamin D can cause hypercalcemia (American Veterinary Medical Association, 2010)
 - May lead to calcification of smooth muscle, kidney failure, cardiovascular and nervous system disorders

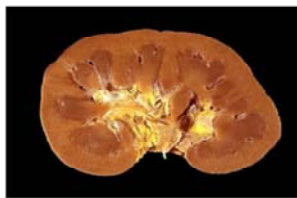


Mineralization of a kidney due to hypercalcemia.

Although some essential nutrients must be fed at a minimum level for proper body function, some essential nutrients can be toxic to animals when fed at high levels. Having too much of a vitamin can be a hazard as well. Excessive vitamin D has been recognized as a potential hazard in dog food. Because the digestive tract absorbs vitamin D in proportion to the quantity of calcium, over- consumption of vitamin D by dogs causes excessive Ca absorption. This ultimately may lead to hypercalcemia, or hardening, of smooth muscle. Further impacts may include kidney failure and disorders of the cardiovascular and nervous system.

Unintentionally Introduced Chemical Hazards in Animal Foods

- Excessive copper in food for sheep
 - Copper is a required nutrient, but also may be toxic
 - Sheep are particularly sensitive to excessive copper
 - High copper levels cause oxidation of hemoglobin
 - Rapid, sudden death with shiny, blue kidneys



Normal kidney



Diseased kidney due to
excessive copper

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FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

Copper is required, but also potentially toxic, for all animal species. Because molybdenum is responsible for clearing copper from the liver, an overconsumption of copper in ratio to molybdenum may lead to copper toxicity and oxidation of hemoglobin. Copper toxicity can be both chronic and acute. This means that the accumulation of the mineral in the liver can cause toxicity if lower, but still toxic, levels are fed over many days or weeks. However, rapid, sudden death can occur from very high doses in a matter of hours. The picture in the slide shows two kidneys, one that is healthy, and one that is shiny and blue in color due to the oxidized hemoglobin that is characteristic of copper toxicity.

While all species may be impacted by copper toxicity, sheep are particularly sensitive to excessive copper because they have inherently lower molybdenum concentrations compared to other species. A typical sheep diet of 20% grain and 80% forage contains approximately 15 ppm copper with no added copper. When molybdenum levels are approximately 3 ppm, the tolerance level of copper for sheep is typically 20 to 25 ppm. Sheep fed diets with lower molybdenum levels would have a lower copper tolerance.

Chemical Hazards in Animal Foods

- The presence of chemical hazards in animal foods may be:
 - Naturally-occurring
 - Mycotoxins
 - Unintentionally-introduced
 - Pesticides and process-related or industrial chemicals
 - Drug carryover
 - Nutrient deficiencies or toxicities
 - **Intentionally-introduced for purposes of economic gain**
 - **Melamine**



The focus to this point has been on chemical hazards that occur naturally or are unintentionally- introduced, however, there is the rare activity where a hazard is intentionally-introduced for purposes of economic gain. The most well-known example of this was the pet food recall in 2007 due to melamine contamination. This wide recall was due to a single overseas supplier that blended melamine into product labeled as wheat gluten to elevate the crude protein level of the ingredient. The ingredient was later purchased by pet food manufacturers. The combination of melamine with cyanuric acid in the ingredient resulted in more than 8,500 reported animal deaths. The original intent of adding the melamine was to falsify protein content. The unexpected result was that it created a major animal food safety concern. This was a clear incident when a supplier intentionally introduced a hazard for economic gain. Using visual inspection and verified suppliers may have prevented this hazard from entering the animal food supply.

Example Hazards in Animal Foods

- Biological hazards:
 - Bovine Spongiform Encephalopathy
 - *Salmonella* spp.
 - *Listeria monocytogenes*
- Chemical hazards:
 - Mycotoxins
 - Pesticides and process-related or industrial chemicals
 - Drug carryover
 - Nutrient deficiencies or toxicities
- **Physical hazards:**
 - **Stones**
 - **Glass**
 - **Metal**

Now that biological and chemical hazards have been discussed, the focus will shift to the final category, physical hazards.

Physical Hazards in Animal Foods

- Stones
 - May be introduced with ingredients from fields
 - Choking, broken teeth
- Glass
 - May be introduced from broken lightbulbs or other glass in manufacturing facility
 - Cuts
- Metal
 - Punctures, cuts, broken teeth



Tool laying on top of hand-add grate

Physical hazards, when present, may result in animal illness or injury. Typically, physical hazards in animal food are not associated with human illness or injury, but they are concerns for the animals consuming the food. These physical hazards can include items like stones, which may be introduced with ingredients from fields and cause choking or broken teeth in animals. Broken glass may be introduced from broken light bulbs or other glass in the ingredient or animal food manufacturing facility and result in cuts to the animal. Finally, metal may be introduced at a number of locations because nearly the whole animal food manufacturing process occurs using equipment with metal parts. Metal can result in several injuries to animals when consumed, such as cuts, broken teeth, or blockages.

Animal Food Safety Hazards Summary

- *Hazard means any biological, chemical (including radiological), or physical agent that has the potential to cause illness or injury in humans or animals.*
- Biological hazards in animal food may include BSE, *Salmonella* spp. and *Listeria monocytogenes*.
- Chemical hazards in animal food may include naturally-occurring hazards, such as mycotoxins, unintentionally-introduced, such as drug carryover or copper toxicity, and intentionally-introduced for purposes of economic gain, such as melamine.
- Physical hazards in animal food may include stones, glass, and metal.



That ends our discussion on animal food safety hazards. Remember that a hazard is defined as *any biological, chemical (including radiological), or physical agent that has the potential to cause illness or injury in humans or animals*. Biological hazards in animal food may include *Salmonella* spp. and *Listeria monocytogenes*. Chemical hazards may include naturally-occurring hazards, such as mycotoxins, unintentionally-introduced hazards, such as drug carryover and copper toxicity, and intentionally-introduced for purposes of economic gain, such as melamine. Finally, physical hazards in animal food may include stones, glass, and metal. Now that the participants have a fuller understanding of hazards associated with different types of animal foods, the next chapter will begin to describe the Food Safety Plan.

Exercise 3

- Either alone or in small groups (2-3 individuals):
 - Consider a single type of animal food manufactured within your facility or a facility you have visited or inspected.
 - Identify:
 1. Ingredients or raw materials used in that animal food.
 2. The process steps used for the manufacturing, processing, packing, or holding of that animal food.
 3. *Known or reasonably foreseeable hazards* associated with the ingredients and facility.
 4. If there are any *hazards requiring a preventive control*.
 5. If there are common preventive controls used to significantly minimize or prevent the hazard for that type of animal food.

Exercise 3 Summary

- The types of hazards vary between facilities and the types of animal food they manufacture.
- Appropriate controls measures may vary across facilities, types of animal food, and across industry segments.
- Justification is important to describe hazard analysis to suppliers, customers, employees, and regulatory personnel.