What to Expect When Your Farm is Examined for BSE

Since 1997 The Food and Drug Administration has inspected ruminant feeding operations in an effort to safeguard against Bovine Spongiform Encephalopathy. Inspections are credited for boosting consumer confidence following the initial shock of BSE being discovered in the U.S. in 2004. Until now inspections have centered on feed mills, renderers, and feed distributors. The FDA is shifting its focus to include dairy farms, though, meaning some Michigan dairy producers may find themselves dealing with an on-farm inspection. Knowing what to expect, and what to do, will be a great asset in that situation.

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In 1997, the Food and Drug Administration (FDA) adopted regulation 21 CFR 589.2000, commonly referred to as the “BSE/Ruminant Feed Regulation,” to help prevent the introduction of bovine spongiform encephalopathy (BSE), or “mad cow disease”, into the United States. Because BSE is primarily spread when infected cattle are rendered into feed, and then re-fed to other cattle, the main objective of the regulation was banning most mammalian protein (prohibited material) from cattle and other ruminant feed.

To ensure compliance with the BSE/Ruminant Feed regulation, FDA and state agriculture agencies routinely conduct inspections and collect feed samples at renderers, feed manufacturers (feed mills), protein blenders, pet food manufacturers, pet food salvagers, animal feed distributors, animal feed transporters, and ruminant feeders.

The majority of current BSE inspections focus on feed mills, renderers, and feed distributors. Realizing, however, that these firms have achieved a very high level of compliance, that many ruminant feeding operations manufacture their own feed, and only a fraction of the ruminant feeding operations throughout the country have been inspected, FDA is shifting its focus toward ruminant feeding operations such as dairies and beef farms. Since these inspections usually take place at farms, they are often referred to as “on-farm” inspections.

On-farm Inspections

Although BSE inspections will continue to be performed at feed mills and other high-risk locations, more and more inspections are taking place on-farm. These inspections help confirm that feeds containing prohibited material are not being fed to ruminants. Additionally, inspections confirm feeds intended for ruminants have not been contaminated with pro-
hibited material throughout the manufacturing and distribution process. From an economic point of view, on-farm inspections also offer additional proof to U.S. trade partners that our beef is free from BSE and safe to consume.

Like all BSE inspections, on-farm inspections are mandatory and any ruminant feeder, regardless of size, is subject to inspection. Farms are selected randomly for inspection from a state-wide database of known producers. Most inspections are conducted using a compliance assistance approach with the inspector utilizing the inspection time to inform producers about their responsibilities under the BSE/Ruminant Feed regulation and provide information on how to protect themselves, their livestock and their industry from BSE.

Inspectors also spend time covering one of the main components of the BSE/Ruminant Feed regulation: feed ingredients and labeling. Under the regulation, producers are required to retain at least one representative label or invoice for each feed they receive that contains any animal protein product for a minimum of one year. This requirement ensures producers are reviewing feed labels and ensuring their ruminants are not being fed prohibited material. Producers may find it helpful to also retain labels from feeds containing no animal proteins. This not only helps verify the producer doesn’t use animal proteins, and therefore is not required to retain labels, but it also shows the producer is aware of the regulation and is taking a proactive role to protect ruminant stock.

If selected for an on-farm inspection, a producer can expect the following.

- Farms will receive a letter in the mail notifying them that they have been selected for an inspection.
- Whenever possible, inspectors will contact producers to schedule an inspection, which will take place during normal business hours.
- Most on-farm inspections will take less than two hours to complete.
- All inspectors will provide a state or federal photo ID and issue the producer a signed FDA “Notice of Inspection” form.
- Inspectors may ask to see the producer’s feed storage area and any feed they have in stock. Inspectors will review the labels of the feed to verify its ingredients and make sure it is properly labeled.
- Inspectors may take a small sample (approximately 2 lbs.) of feed in order to verify it has not been contaminated with prohibited material.

Summary

BSE has had an overwhelming effect on the U.S. beef industry, particularly exports. In 2004, after confirming its first case of BSE, U.S. beef exports dropped by a staggering 75 percent (Fig. 1). Since 2004, beef exports have slowly risen, due in large part to the hundreds of BSE inspections performed every year and the thousands of samples collected. In order

![U.S. Beef Exports (1998-2006)](image)

Figure 1. U.S. beef exports dropped 75% following discovery of BSE in American Beef in 2004. Exports have climbed steadily since, due in part to BSE inspections, which has boosted confidence in U.S.
to continue this improvement, it is critical that we continue to offer the American public and U.S. trade partners as much evidence as possible that we are doing everything we can to protect our food supply from BSE.

Resources

U.S. Food and Drug Administration’s (FDA) BSE website is <http://www.fda.gov/cvm/bsetoc.html>. FDA’s Guidance for Industry Documents is available at <http://www.fda.gov/cvm/bse_guidance.htm>. These documents are very informative and provide specific information about the BSE/Ruminant Feed regulation as it relates to ruminant feeders. Paper copies of these guidance documents also can be obtained by contacting the Michigan Department of Agriculture’s Pesticide and Plant Pest Management Division.

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