EXTENSION’S ROLE IN THE
10-YEAR TRANSITION TO
USDA FSIS INSPECTION
OF CATFISH

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FSIS Technical Committee

- MSU - Craig Tucker, Jimmy Avery, Lester Khoo, Byron Williams, Juan Silva, Charlie Hogue, Mark Peterman
- UAPB - Andy Goodwin, Carole Engle
- AU - Terry Hanson, Eric Peatman, Luke Roy
Siluriformes Imports and US Domestic Production

(Round Weight Equivalence)

Source: USDA NASS Catfish Production and Dr. Terry Hanson, Auburn Univ.
US Channel Catfish = $4.93

Chinese Channel Catfish = $3.19

Vietnamese Swai = $1.79
Antimicrobials and parasiticides reported in use by Pangasius nursery and grow-out farms during 2011 that are not allowed in the U.S.

<table>
<thead>
<tr>
<th>Class</th>
<th>Generic Name (Common Brand Name)</th>
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<tbody>
<tr>
<td><strong>Antimicrobials</strong></td>
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<tr>
<td></td>
<td>Amoxicillin (Amoxil)</td>
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<td>Ampicillin</td>
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<td>Cephalexin (Keflex)</td>
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<td>Colistin</td>
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<td>Enrofloxacin</td>
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<td>Ciprofloxacin (Cipro)</td>
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<td>Norfloxacin</td>
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<td>Flumequine</td>
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<td>Kanamycin</td>
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<td>Doxycycline (Vibramycin)</td>
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<td>Rifampicin</td>
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<td>Sulfamethoxazole and trimethoprim</td>
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<td>Apramycin and levofloxacin</td>
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<td>Ampicillin and colistin</td>
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<td>Enrofloxacin, sulfadimidine, and trimethoprim</td>
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<td>Cephalexin and gentamycin</td>
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<td>Doxycycline and florfenicol</td>
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<td>Amoxicillin and kanamycin</td>
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<td>Gentamicin and colistin</td>
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<td>Oxytetracycline and thiamphenicol</td>
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<td><strong>Parasiticides</strong></td>
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<td>Ivermectin</td>
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<td>Praziquantel</td>
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Timeline

- 2008 Farm Bill
- Proposed Rule – 2011
- 2014 Farm Bill
- Final Rule – 2015
- Domestic Inspection – 2016
- Full Inspection – September 2017
FSIS Risk Assessment (2009)

- Applying FSIS Inspection to Siluriformes will:
  - Reduction of 175,000 lifetime cancers
  - Reduction of 91.8 million exposures to antimicrobials
  - Reduction of 23.28 million exposures to heavy metals
  - Removed by OMB
  - Left with saving 1200 illnesses from *Salmonella*
Consumer Groups (2009)

• 2-day Tour and Session
• Safe Tables Our Priority
• Food & Water Watch
• Center for Science in Public Interest
• Consumer Federation of America
• United Food & Commercial Workers
October 7, 2014

The Honorable Shaun Donovan  
Director  
Office of Management and Budget  
725 17th Street, N.W.  
Washington, D.C. 20503

Transmitted via facsimile: (202) 395-3888

Dear Director Donovan:

We are writing to request that you expedite your review of the U.S. Department of Agriculture’s (USDA) draft final rule on the inspection of catfish and catfish products. More than six years have passed since the Food, Conservation, and Energy Act of 2008 (Farm Bill) assigned regulatory responsibility for catfish to the USDA’s Food Safety and Inspection Service (FSIS). It is vital for implementation to begin as soon as possible to ensure that catfish products distributed in the United States are safe, wholesome, and free of unapproved drugs and potentially harmful contaminants.

- Food Defense Plan
- Required of all food types under FSIS
- Required By Homeland Security
- Evaluation of all points in production and processing
- DC Meetings
FSIS Training DC & MS (2009)

Day 1 (Avery)
- Catfish Industry Overview
- Catfish Production Practices
- Ponds and The Catfish Environment
- History and Biology of Catfish
- Catfish Diseases and Treatments

Day 2 (Silva)
- Catfish Processing Industry
- Processing Catfish
- Catfish Hazards and Sanitation
- Catfish Packaging and Storage
- The Catfish Market

- MSU - Craig Tucker (group leader), Jimmy Avery, Lester Khoo, Byron Williams
- UAPB - Andy Goodwin, Carole Engle
- AU - Terry Hanson, Eric Peatman
Offer of Technical Assistance (April 2014)

• Sent to Al Almanza, FSIS Administrator
• Almanza asked for review of proposed course, invited group to help develop or deliver course. Referred to Watts, Asst. Admin.
• Offer to Watts. Suggested switching to teaching “food safety risks” not “process”.
• Watts replies “.. look forward to collaborating and working with you..”
Catfish Industry Familiarization for FSIS (2014)

- Total of 16 Hours
- Deliver course 3 times
- Handout for each section
- 1 or more finished video productions
- Pretest, post-test, and questionnaire regarding effectiveness of course
Final Rule (2015)

- No input
- No consideration of Technical Committee comments from 2011
FSIS Educational Meeting (2016)

- Facilitation of meeting
- Preparation of questions submitted prior to meeting
- Response to FSIS presentations
GAO Update (2016)

- How do farms address water quality?
- What is the source and type of feeds?
- Has FSIS Inspection changed transport?
- How do farmers deter predators?
- What diseases do catfish get and what impacts the severity of these diseases?
- What drugs and chemicals are used in catfish culture?
Senate Disapproval Resolution (2016)

- McCain sponsor
- Within 2 weeks, Senate votes to return Inspection back to FDA
- Passes to House for vote
Disapproval Res. House (2016)

- Visit 435 offices
- Two trips to DC
- The votes to pass were there
- House leadership never brings it to vote
USDA FSIS Inspection (Imports)

- 8,500 shipments of catfish
- From April 15 until Dec. 31, 2016 48 shipments were inspected at port (1.5 million lbs)
- 2 additional shipments seized in 2017
- 491,504 lbs of adulterated or ineligible product were prevented from entering commerce
USDA FSIS Inspection (US)

- 2 domestic recalls
- Crystal Violet (21,500 lbs)
- Malachite Green (5,300 lbs)
- Subsequent samples were negative
- No traceback initiated by USDA or FDA
- 100% inspection begins Sept. 2017
Recall Task Force (2017)

• Goal was to find “smoking gun”
• State agencies had no regulatory authority
• Goal changed to prevention
• Offer to develop QA Program patterned after Trade Adjustment Assistance program
Guidelines Review (2017)

• Gave “best practice recommendations” by FSIS
• Based on the best scientific and practical considerations
• Two separate meetings with industry
• 14 pages of response to a 65 page document
Trump’s FY18 Budget

- Cuts USDA funds to operate Catfish Inspection Program and send back to FDA
- USDA language gives glowing report on FSIS
- Non-starter bur it gives opposition talking points
- Obama attempted same strategy