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# Commercial Feed Program Annual Report

2025 Annual Report

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## Program Purpose

The Commercial Feed Program (CFP) is one of the programs within the Food and Feed Safety Division (FFSD) of the Minnesota Department of Agriculture (MDA). The program regulates commercial feed so that purchasers of commercial feed are protected, the health of animals consuming the feed is assured, industry is subject to uniform and fair conditions of regulation, public confidence in the feed/food chain is maintained, and orderly commerce is ensured. This is done through licensing, small package pet and specialty pet food registrations, and conducting risk-based inspections under state authority and U.S. Food and Drug Administration (FDA) authority. The CFP also conducts surveillance inspections, compliance follow-up inspections, compliance investigations, emergency response/investigations, sampling, label reviews, recall effectiveness checks, audits, and issues Good Manufacturing Practices Certificates and Free-Sale Certificates for export, along with providing outreach. The focus areas for the CFP have long been: Ensure Food and Feed Safety, Consumer Protection, and Orderly Commerce.

## Program Goals and Objectives

The CFP helps protect food and feed safety in Minnesota by conducting inspections, collecting samples, and carrying out other regulatory activities. The CFP’s goals have long reflected the services we strive to provide to the regulated industry and consumers.

### Goal 1: State inspection workplan adherence

We aim to complete all planned annual inspections for our commercial feed licenses and pet food registrations. Risk classification and inspection frequencies are established using risk-based assessment data collected during each routine inspection. A facility's risk is classified as either high, medium, or low.

## **Goal 2: Federal inspection quality and execution**

The CFP has long held a federal contract and partnership with the Food and Drug Administration (FDA). Staff annually conduct inspections and sampling on behalf of our federal partners. Reports are audited and reviewed for quality and timeliness by FDA staff. The CFP targets meeting all federal contract-requirements and continues to enhance partnership.

## **Goal 3: State and laboratory flexible funding sampling commitment**

In collaboration with the Minnesota Department of Agriculture Laboratory Services Division (LSD), the CFP participates in the FDA Laboratory Flexible Funding Model Cooperative Agreement (LFFM). The LSD, CFP, and the FDA collaborate to create an annual LFFM sampling plan. The LSD works with the CFP staff to collect all LFFM samples within the predetermined annual timeline. The LFFM samples are added to the state sampling plan, and logistics are determined by inspection staff. The CFP aims to complete all planned samples following standard operating procedures and reporting requirements.

## **Goal 4: Palmar amaranth risk assessment**

The CFP has coordinated with the Minnesota Plant Protection Division (PPD) in order to better understand the risk landscapes for Palmar Amaranth a noxious weed that is resistant to herbicides. High risk commodities and supply chains are targeted with PPD's assistance, and an annual sampling plan is conducted in partnership with inspection staff from both divisions. Sampling results are determined with the help of the Minnesota Seed Lab, and reports are shared with responsible parties.

## **Goal 5: Animal feed regulatory program standard compliance**

The CFP is one of many states that participate in the Animal Feed Regulatory Program Standards and are audited on a 36-month basis by the FDA. The most recent assessment was performed in May of 2025. The CFP aims to be fully compliant with all standards and shares some of the best practices that program staff have developed for federal and other regulatory programs.

## **Goal 6: Highly pathogenic avian influenza response**

The CFP staff continue to support and volunteer staffing and hours to the coordinated response to the Minnesota Highly Pathogenic Avian Influenza (HPAI). The state has organized an incident response team comprised of multiple agencies and coordinates with the federal responses. The CFP targets its skills and expertise to support the needs of the response team and mitigate the virus impacts in Minnesota.

# **Program Impact and Outcomes**

## **Goal 1: State inspection workplan adherence**

**Routine inspections were conducted for 100% of planned firms:** 341 routine inspections were completed in 2025, including any new license holders. Each firm was assessed for compliance. Any required observations and orders were issued to the firm verbally and in reports written by the inspection staff. Any observed risks or potential adulteration of regulated products were communicated to the firm during the inspection to provide the earliest opportunity for compliance and risk mitigation. Staff plans were built to conduct follow-up

inspections or escalate enforcement action as needed. Education and outreach needs of the firm were addressed by inspectors during the course of each inspection.

## **Goal 2: Federal contract inspection quality and execution**

**Inspections conducted for 100% of contracted firms:** 40 FDA inspections were completed in 2025. Each firm was assessed following federal contract requirements. Inspection reports were submitted to the FDA for review and quality assessment within 30 working days. The CFP was not required by the FDA to complete any corrective actions, as all contractual obligations, in terms of timeliness and quality, were met or exceeded. All inspected firms benefited from the contract as they had a Minnesota-based MDA inspector with a higher level of knowledge and ability to service the facility needs as opposed to a federal inspector.

## **Goal 3: State and laboratory flexible funding sampling commitment**

**Samples taken, analyzed, and reports shared for 100% of planned regulated industry locations:** Inspectors, with the support of a newly trained sampling coordinator, were successful in 122 samples being completed for state surveillance and federally contracted (LFFM) samples. Inspectors were successful in very low turnaround times of sample collection to support a timely response to the firm. These services provide the firm with a regulatory assessment of their products and a comparison of labeling. Any results showing actionable levels of adulteration required firms to conduct an internal investigation and provide their results in writing within 30 days. Sample results for the LFFM are shared with federal partners to help in their congress-mandated national regulatory goals and mission for a safe food and feed supply.

## **Goal 4: Palmar amaranth risk assessment**

**100% of Planned Surveillance Activities Conducted:** PPD Inspectors partnered with CFP Inspectors were able to collect 50 samples from suspected high-risk firms throughout Minnesota. The samples were taken following a collaborative standard operating procedure and analyzed by the Minnesota Seed Lab. Results of the samples were shared with impacted parties, including whether any viable palmar amaranth was found. The sample results shared gave the firms a regulatory assessment of their ingredients and final feed products.

## **Goal 5: Animal feed regulatory program standard compliance**

**Full Compliance to all 11 Animal Feed Regulatory Program Standards (AFRPS):** FDA audit staff reviewed documentation shared from the CFP and conducted a multi-day virtual audit of the program for all standards. The audit found the CFP to be in full compliance with the standards. Minnesota's full compliance with the feed standards helps to ensure a uniform and consistent approach to animal food regulation for all its customers, both in Minnesota and those that operate on a national level.

## **Goal 6: Highly pathogenic avian influenza response**

**CFP staff involvement in planning, logistics, and operations teams:** Multiple CFP staff were requested and volunteered their experience and time to help respond to 37 new active sites found to have the presence of

HPAI. The staff hours and expertise allowed the IMT to continue to function and effectively respond to the needs of the impacted entities in Minnesota. Staff were asked to rotate in roles throughout the year to allow a constant and fresh workforce focused on risk mitigation.

## Program Outputs

Information provided in the table below demonstrates the variety of activities conducted by the CFP. Estimations in the third column of Table 1 below are based on staff observations, building metrics, and initiating data recording in 2025.

**Table 1: Commercial Feed Program inspections completed in 2025**

Type of Inspection	Description	Total Number in 2025 (estimate)
<b>Pet Food &amp; Specialty Pet Food Label Review</b>	Comprehensive review of pet and specialty pet food to ensure compliance with applicable regulations	600
<b>Routine</b>	Conducted based on predetermined frequency according to the risk level of the firm to ensure compliance with applicable regulations	320
<b>Sampling</b>	Obtaining a small but representative portion of feed for laboratory analysis	208
<b>Follow-up</b>	Conducted after a routine inspection to verify compliance with previously identified issues	63
<b>Licensing</b>	Conducted to confirm if a manufacturer, distributor, or guarantor is currently licensed. Performed on-site and/or in the office	55
<b>Retail Surveillance</b>	A targeted, limited-scope compliance check conducted at licensed or unlicensed facilities to identify potential regulatory concerns	25
<b>Recall Effectiveness Check</b>	Conducted to verify that all consignees have received notification about a recall and have taken appropriate action	15
<b>Pet/Specialty Pet Registration</b>	Conducted to confirm if Pet/Specialty Pet Food is currently registered, performed on-site, and/or in the office	11
<b>Incident Response</b>	Targeted inspections based on specific issues or identified concerns	8
<b>Investigations</b>	Targeted inspections based on specific issues/concerns	7
<b>Complaints</b>	Conducted in response to a complaint from outside of the Commercial Feed Program	7

**Table 2: Commercial Feed Program Activities completed in 2025**

Type of Program Activity	Description	Total Number in 2025 (estimate)
<b>Pet / Specialty Pet Food Registrations</b>	Number of pet/specialty pet food products registered with the MDA	11000
<b>Licensure</b>	Number of entities that hold a valid commercial feed license	2000
<b>Unregistered Products Found in Distribution</b>	Number of pet/specialty pet food products documented in distribution without required registrations	750
<b>Tonnage Reviews</b>	A comprehensive administrative review of a firm's distribution records to ensure correct tonnage fees have been paid	199
<b>Free Sale Certificates</b>	A requested, voluntary license and label review designed to facilitate trade resulting in a certificate upon successful completion	89
<b>Outreach Events</b>	An organized event (in-person or remote) designed primarily to educate a variety of stakeholders	31
<b>Label Courtesy Reviews</b>	Unofficial label review requested by the industry. For guidance purposes only	30
<b>GMP Certificates</b>	A requested, voluntary assessment of a facility's compliance with applicable good manufacturing practices regulations resulting in a certificate upon successful completion.	4

## Program Inputs

The CFP activities are largely funded through fees from licenses, inspections through tonnage, and product registrations. CFP fees are maintained in the Agricultural Fund Commercial Feed inspection account. The CFP also receives funding from the FDA for inspections conducted at selected locations. Federal cooperative agreement funding also supports the ongoing maintenance of a quality management system covering inspections, training, enforcement, and auditing systems. The estimated budget for the state fiscal year 2025 was \$4,267,023 total, with \$4,029,415 coming from dedicated fees, \$175,000 from special revenue (federal contract), and \$62,608 from a federal grant.

The CFP is composed of 18 regulatory staff. The Feed Program Manager supervises three Feed Program Supervisors, the Feed Program Analyst, and the Regulatory Payment Admin. The rest of the staff are broken into 3 teams (Metro, North, and South) with a supervisor overseeing each team's program work. The CFP teams' work is supplemented by the Licensing & Logistics Management (LLM) Unit, the Response and Outreach Unit (RO), the Business and Quality Management Unit, and the Compliance Unit.

The CFP, along with the division's operations units, carries out its responsibilities by maintaining accurate inventories of regulated entities, assessing conformance to AFRPS, responding to feed safety incidents, and

determining and administering enforcement activities. In working together, the CFP can achieve its goals as well as meet the division principles.

The CFP has built a quality assurance program through implementation of the Animal Feed Regulatory Program Standards (AFRPS). The program started implementation of AFRPS in 2014 and was found in full conformance by the FDA in 2019. It continued to maintain that status in 2021 and 2023. This complements the desire for an Integrated Food Safety System (IFSS) and promotes program consistency through enhanced inspection training, stronger laboratory services, effective emergency response, and strengthened outreach.

Electronic data systems are key to capturing the results of regulatory work to allow for seamless communication and access to information across the division. The FFSD uses a program called USA Food Safety to maintain the inventory of regulated firms and report the results of inspections. This enables efficient management of inspection data (official records, compliance actions) and summary results, allowing for data-driven decision-making, such as compliance actions based on violation trending. The CFP also has access to all the equipment needed for inspectors to perform the functions of their job. You may use the [Find Your Inspector Tool](#) to locate the inspector in your area.

## Future Goals/Objectives

The CFP plans to participate in and complete the following activities in the upcoming year:

- **Pilot Sampling Study**

The CFP will have conducted the third year of the Pilot Sampling Study in collaboration with the Plant Protection Division and the feed industry. This will help understand the risk landscape in the feed supply regarding Palmer amaranth, a noxious weed found in the state. Both programs have routinely built a joint report outlining the data observed. The programs hope to combine the three years' worth of sampling data into a final, conclusive public report in 2026.

- **Support HPAI Response**

The CFP will participate in the Incident Management Team with the Minnesota Board of Animal Health in response to sites impacted by HPAI. This support includes sampling, biosecurity efforts, and actions to minimize or eliminate the pathogen.

- **Staffing and Hiring**

The CFP will hire for essential positions to support its continued success and backfill recently vacated positions. This includes backfilling a Feed Supervisor and two Pet Food Regulatory Officials.

- **Sampling Expansion**

The CFP is planning to leverage newly acquired staff and expand the sampling plan to higher quantities and new analytes with collaboration and support from our laboratory. The CFP is targeting this expansion without a reduction in quality or timeframes for reporting.

- **Data Analysis and Reporting**

The CFP, with the help of our Feed Analyst, will explore new methods for data analysis, improve data

accuracy, and develop better ways to report meaningful data. This includes conducting a study on valuable data for internal staff needs and creating a monthly report based on the study's outcomes. Annual reports will be remodeled to better serve our external customer needs.

- **Modernize Processes**

The CFP will modernize processes to offer more convenient options to customers by transitioning to online application submissions.

## Acknowledgments

The CFP recognizes its farmers, regulated industry, and partners that work with us in our mission to ensure a safe food and feed supply chain. The CFP has long held strong positive relationships with organizations such as Minnesota Grand and Feed Association, University of Minnesota (UMN), Association of American Feed Control Officials (AAFCO), the Center of Veterinary Medicine (CVM), the Food and Drug Administration (FDA), the American Feed Industry Association (AFIA), the National Animal Supplement Council (NASC), the Minnesota Food Safety and Defense Task Force. We are grateful for the national work that all parties bring regarding incident response and mitigation of known and potential risks to the food and feed supply. The work could not be accomplished without our well-trained, experienced, and engaged internal peers and Commercial Feed staff interacting with our customers each day. We are grateful to our partners within and beyond the Minnesota Department of Agriculture who contributed their time, expertise, and inquiries, and feedback. Together, we are building a stronger foundation for food and feed safety.