

## Raw Agricultural Commodities Guidance

Your answers indicate that your facility is solely engaged in holding one or more Raw Agricultural Commodities (RACs). Facilities of this type are exempt from 21 CFR 507 Subparts B, C, and E. These portions relate to Current Good Manufacturing Practices (CGMPs), a Food Safety Plan (FSP) and Supply Chain Program Preventive Control. However, your facility should remain aware of [Subpart A](#) (General Provisions) and [Subpart F](#) (Requirements Applying to Records That Must Be Established and Maintained).

A facility that is required to comply with Subpart A should be aware of the General Provisions as outlined in that portion of the PCAF Rule. Important areas of focus include definitions used throughout the rule (Section 507.3), requirements for Qualified Individuals who handle animal food (Section 507.4), and various firm exemptions (Section 507.5).

Of the General Provisions, Section 507.4 is likely to be the most important area of concern for a firm of this type. This section deals with firm management's responsibility to ensure that all employees handling animal food are appropriately trained for their jobs. An appropriately trained employee is defined as a Qualified Individual in Section 507.3 of the rule. The qualifications can be training, education, experience or any combination of the three. The rule also states that supervisory personnel are to be responsible for the training and its documentation.

The final section which applies to this facility type is documentation records. Rules regarding recordkeeping are outlined in Subpart F. Firms that are engaged solely in holding RACs should consider being aware of requirements applying to records (Section 507.202) and requirements for record retention (Section 507.208). General requirements for records include items such as they must be originals or true copies, be accurate, indelible and legible, as detailed as necessary, and include the identity of the facility, date, and identity of person performing the documented activity. Regarding record retention, all records are to be kept at the facility they were prepared for at least two years unless indicated otherwise.

These are some key points to remember to ensure that your facility remains in compliance with these new rules. For further information, you may reference 21 CFR 507 [here](#) or you can view a Draft Guidance for firms "Solely Engaged" [here](#). If you have further questions, you may reach out to your local Commercial Feed Inspector or contact the Commercial Feed Program at 402-471-2351 or [agr.webmaster@nebraska.gov](mailto:agr.webmaster@nebraska.gov).

*The above is provided for informational purposes only. It is not intended to be legal advice and does not replace the advice of independent legal counsel.*