



Association of American Feed Control Officials

**2018 AAFCO Annual Meeting  
Committee Reports**



**July 30–August 1, 2018  
Marriott Harbor Beach  
Fort Lauderdale, Florida**





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## Association Business Meeting Minutes

2018 AAFCO Midyear Meeting  
January 22, 9:20–10:00 am, Garden Grove, CA (Anaheim)

- 1) Stan Cook convened business session of the Association at 8:47 am
  - a. Distinguished Service Award presented to Dr. Robert Waltz for outstanding dedication to animal food safety and AAFCO by serving on the Governing Council Partnership for Food Protection and the Food Safety Preventive Controls Alliance.
- 2) Bob Geiger states the AAFCO Board of Directors approved the following Committee Reports: Current Issues and Outreach, Education and Training, Feed and Feed Ingredient Manufacturing, Feed Labeling, Ingredient Definitions Committee, Inspection and Sampling, Lab Methods & Services, Model Bills and Regulations, Pet Food, Proficiency Testing, Strategic Affairs, Ingredient Definitions eMeeting October 13th and recommends the same to the membership. I so move. **Doug Lueders Seconds. MOTION CARRIES**
- 3) **Acceptance of Committee Recommendations: –Bob Geiger, President-Elect**  
**Ingredient Definitions 1-3 & eMeeting October 13, 1-5:**  
**Report starts on page 21 of the Committee Report Book**
  - 1) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the following tentative definitions as Official and remove the existing Official definition if any:
    - a) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the following tentative definition **T9.10 Poultry By-Product Meal** as Official and remove the existing Official definition if any in the AAFCO Official Publication and recommends the same to the membership. I so move. **Jacob Fleig Seconds. MOTION CARRIES**
      - i. T9.10 Poultry By-Product Meal: Consists of the ground, rendered, clean parts of the carcass of poultry, such as necks, feet, undeveloped eggs, viscera, and whole carcasses, exclusive of added feathers, except in such amounts as might occur unavoidably in good processing practices. The label shall include guarantees for minimum crude protein, minimum crude fat, maximum calcium (Ca), and minimum phosphorus (P). The calcium (Ca) level shall not exceed the actual level of phosphorus (P) by more than 2.2 times. If the product bears a name descriptive of its kind, the name must correspond thereto. It shall be suitable for use in animal food. (Proposed 1985, Adopted 1990, Amended 2000, Proposed 2016 rev. 1)
    - b) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the following tentative definition **T9.14 Poultry By-Products** as Official and remove the existing Official definition if any in the AAFCO Official Publication and recommends the same to the membership. I so move. **Meagan Davis Seconds. MOTION CARRIES**
      - i. T9.14 Poultry By-Products: Consists of nonrendered clean parts of poultry, such as heads, feet, viscera, and whole carcasses, free from foreign matter except in such trace amounts as might occur unavoidably in good processing practices. If the product bears a name descriptive of its kind, the name must correspond thereto. It shall be suitable for use in animal food. (Proposed 1963, Adopted 1964, Amended 2000, Proposed 2016 rev. 1)
    - c) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the following tentative definition **T9.57 Poultry** as Official and remove the existing Official definition if any in the AAFCO Official Publication and recommends the same to the membership. I so move. **Meagan Davis Seconds. MOTION CARRIES**
      - i. T9.57 Poultry is the clean combination of flesh and skin with or without accompanying bone, derived from the parts or whole carcasses of slaughtered poultry, or a combination thereof, exclusive of feathers, heads, feet, and viscera. If it bears a name descriptive of its kind, it must correspond thereto. If the bone has been removed, the process may be so designated by use of the appropriate feed term. It shall be suitable for use in animal food. (Proposed 1978, Adopted 1979, Amended 1995, Amended 1997, Proposed 2016 rev. 1)

- d) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the following tentative definition **T9.71 Poultry Meal** as Official and remove the existing Official definition if any in the AAFCO Official Publication and recommends the same to the membership. I so move. **Jacob Fleig Seconds.**

**MOTION CARRIES**

i. T9.71 Poultry Meal: is the wet rendered or dry rendered product from a combination of clean flesh and skin with or without accompanying bone, derived from the parts of whole carcasses of slaughtered poultry, or a combination thereof, exclusive of feathers, heads, feet, and viscera. The label shall include guarantees for minimum crude protein, minimum crude fat, maximum calcium (Ca), and minimum phosphorus (P). The calcium (Ca) level shall not exceed the actual level of phosphorus (P) by more than 2.2 times. If it bears a name descriptive of its kind, it must correspond thereto. It shall be suitable for use in animal food. (Proposed 1988, Adopted 1992, Proposed 2016 rev. 1)

- e) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the following tentative definition **T36.14 Direct-Fed Microorganisms** as Official and remove the existing Official definition if any in the AAFCO Official Publication and recommends the same to the membership. I so move. **Austin Therrell Seconds.**

**MOTION CARRIES**

i. T36.14 Direct-Fed Microorganisms: The following microorganisms were reviewed by the Food and Drug Administration, Center for Veterinary Medicine, and found to present no safety concerns when used in direct-fed microbial products. These microorganisms must be nontoxicogenic.

<i>Aspergillus niger</i>	<i>Lactobacillus brevis</i>
<i>Aspergillus oryzae</i>	<i>Lactobacillus buchneri</i> (cattle only)
<i>Bacillus amyloliquefaciens</i>	<i>Lactobacillus bulgaricus</i>
<i>Bacillus coagulans</i>	<i>Lactobacillus casei</i>
<i>Bacillus lentus</i>	<i>Lactobacillus cellobiosus</i>
<i>Bacillus licheniformis</i>	<i>Lactobacillus curvatus</i>
<i>Bacillus pumilus</i>	<i>Lactobacillus delbrueckii</i>
<i>Bacillus subtilis</i>	<i>Lactobacillus farciminis</i> (swine only)
<i>Bacteroides amylophilus</i>	<i>Lactobacillus fermentum</i>
<i>Bacteroides capillosus</i>	<i>Lactobacillus helveticus</i>
<i>Bacteroides ruminicola</i>	<i>Lactobacillus lactis</i>
<i>Bacteroides suis</i>	<i>Lactobacillus plantarum</i>
<i>Bifidobacterium adolescentis</i>	<i>Lactobacillus reuteri</i>
<i>Bifidobacterium animalis</i>	<i>Leuconostoc mesenteroides</i>
<i>Bifidobacterium bifidum</i>	<i>Megasphaera elsdenii</i> (cattle only)
<i>Bifidobacterium infantis</i>	<i>Pediococcus acidilactici</i>
<i>Bifidobacterium longum</i>	<i>Pediococcus cerevisiae</i> (damnosus)
<i>Bifidobacterium thermophilum</i>	<i>Pediococcus pentosaceus</i>
* <i>Enterococcus cremoris</i>	<i>Propionibacterium acidipropionici</i> (cattle only)
* <i>Enterococcus diacetylactis</i>	<i>Propionibacterium freudenreichii</i>
* <i>Enterococcus faecium</i>	<i>Propionibacterium shermanii</i>
* <i>Enterococcus intermedius</i>	<i>Rhodopseudomonas palustris</i> (broiler chickens only)
* <i>Enterococcus lactis</i>	<i>Saccharomyces cerevisiae</i>
* <i>Enterococcus thermophilus</i>	Yeast (as defined elsewhere)
<i>Lactobacillus acidophilus</i>	
<i>Lactobacillus animalis</i>	

(Proposed 1991, Adopted 1993, Amended 2001, 2004, 2006, 2011, 2017)

\*Formerly cataloged as *Streptococcus*.

- f) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the following tentative definition **T60.117 Dried Black Soldier Fly Larvae** as Official and remove the existing Official definition if any in the AAFCO Official Publication and recommends the same to the membership. I so move. **Jacob Fleig Seconds. MOTION CARRIES**

- i. T60.117 Dried Black Soldier Fly Larvae: is the dried larvae of the Black Soldier Fly, *Hermetia illucens*, that has been raised on a feedstock composed exclusively of feed grade materials. The ingredient must contain not less than 34% crude protein and 32% fat on an as-fed basis. The ingredient is dried by artificial means to no more than 10% moisture. It is for use in salmonid fish feed as a source of protein and fat consistent with good feeding practices. (Proposed 2017)
- 2) Establish and publish in the Official Publication a new tentative definition(s) for:
- a) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to establish and publish **T73.311 Hydrogenated Glycerides** in the AAFCO Official Publication as a new tentative definition and recommends the same to the membership. I so move. **Richard Ten Eyck Seconds. MOTION CARRIES**
- i. T73.311 Hydrogenated Glycerides: Are obtained by hydrogenation of animal fats or vegetable oils. They are used solely as a binder and lubricant in pelleting of feed (pelleting aid) of all animal species. Maximum inclusion rate is 4 lb per ton of finished feed. Specifications of animal fats or vegetable oils used to produce the hydrogenated glycerides must meet the requirements stated in AAFCO definition 33.1(for Animal Fat) and AAFCO definition 33.2 (for Vegetable Fat, or oil), respectively. The specification for tallow must specify insoluble impurities not more than 0.15% to be consistent with BSE feed regulation 21 CFR 589.2000 and 589.2001 and a guaranteed titer above 40°C. The source of the hydrogenated glycerides must be indicated on the label. The hydrogenated glycerides must contain, and be guaranteed for, not less than 90% total ester content, not more than 0.8% unsaponifiable matter, not more than 0.001% heavy metals, and not more than 5 of iodine value. The maximum moisture, maximum insoluble matter, maximum free fatty acids, saponification value, and melting range must also be guaranteed on the label. If an antioxidant is used, the common name or names must be indicated on the label, followed by the words “used as a preservative.” (Proposed 2012, Adopted 2015, renumbered & edited 2018)
- b) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to establish and publish **T73.051 Iron Tartrates** in the AAFCO Official Publication as a new tentative definition and recommends the same to the membership. I so move. **Doug Lueders Seconds. MOTION CARRIES**
- i. T73.051 Iron Tartrates: Is the reaction product of sodium tartrates [D-, L-, and meso-tartrates] and iron(III) chloride for use as an anticaking agent in salt. The molar ratio of iron(III) to meso-tartrate must be 1:1. It must contain no less than 8% iron(III) on a dry weight basis. It must contain no more than 1.5% oxalic acid, 3 ppm arsenic, 2 ppm lead, and 1 ppm mercury on a dry weight basis. The maximum iron tartrates inclusion rate (calculated as iron) is not more than 12 ppm.
- c) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to establish and publish **T60.117(B) Dried Black Soldier Fly Larvae** in the AAFCO Official Publication as a new tentative definition and recommends the same to the membership. I so move. **Tim Darden Seconds. MOTION CARRIES**
- i. T60.117(B) Dried Black Soldier Fly Larvae: is the dried larvae of the Black Soldier Fly, *Hermetia illucens*, with or without mechanical extraction of part of the oil, that has been raised on a feedstock composed exclusively of feed grade materials. The ingredient must be labeled with guarantees for minimum crude protein and minimum crude fat on an as-fed basis. If oil is mechanically extracted, maximum crude fat must also be guaranteed on the ingredient label. The ingredient is dried by artificial means to no more than 10% moisture. It is for use in salmonid feed as a source of protein and fat consistent with good feeding practices. (Proposed 2018)
- 3) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to add a new item #20 to the GRAS Notification table in section 101 in the AAFCO Official Publication and recommends the same to the membership. I so move. **Dave Phillips Seconds. MOTION CARRIES**

AGRN (select for detailed record)	Notifier	Substance	Common and Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
<a href="#">20</a> (PDF, 899 pages)	DSM Innovation, Inc. BioProducts & Services Division	Inactivated modified <i>Saccharomyces cerevisiae</i>	<i>Saccharomyces cerevisiae</i> expressing xylose isomerase from <i>Piromyces</i> sp. E2	As a component of animal feed when used in the fermentation of corn to produce ethanol	Pets, poultry (broilers, layers and breeding chickens; turkeys), swine (piglets, growers, finishers, gestating and lactating sows), bovine (beef and dairy), fish (salmonoids, catfish, tilapia), and minor species such as ducks, quail, sheep, and goats	Apr. 29, 2016	<a href="#">FDA has no questions.</a> (PDF - 4 pages)

- 4) Publish the following definitions as Official in the *Official Publication*:
- a) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish **33.17 Gamma-Linolenic Acid Safflower Oil** as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Richard Ten Eyck Seconds. MOTION CARRIES**
- i. 33.17 Gamma-Linolenic Acid Safflower Oil: The food additive gamma-linolenic acid (all-cis-6,9,12-octadecatrienoic acid) (GLA) safflower oil contains an omega-6 fatty acid that may be safely used in animal food in accordance with the following conditions:
- (a) The additive GLA safflower oil is produced in the oil obtained from whole seeds or partially dehulled seeds or both obtained from a *Carthamus tinctorius* L. safflower Centennial variety genetically engineered to express the delta-6-desaturase gene from *Saprolegnia diclina* Humphrey. The 453 amino acid, delta-6-desaturase enzyme converts the fatty acid linoleic acid to gamma-linolenic acid during seed development. This gamma-linolenic acid safflower oil may be safely used in complete dry adult maintenance dog food as a source of gamma-linolenic acid and other omega-6 fatty acids in accordance with the following prescribed conditions:
- (1) The gamma-linolenic acid safflower oil obtained from the seeds of the genetically engineered safflower Centennial variety may be blended with oil obtained from seeds of non-engineered oleic acid safflower varieties in order to meet the specifications required for the additive or the blend in paragraph (2).
- (2) The additive or a safflower oil blend containing the additive for use in animal food meets the following specifications:
- (i) Crude fat content of the gamma-linolenic acid safflower oil or its blend is not less than 99.5 percent.
- (ii) Gamma-linolenic acid content is between 400 and 450 milligrams gamma-linolenic acid per gram of the gamma-linolenic acid safflower oil or its blend.

- (iii) Total content of stearidonic acid and cis, cis-6, 9-octadecadienoic acid in the gamma-linolenic acid safflower oil or its blend must not exceed a total of 0.3 percent.
    - (3) Addition of gamma-linolenic acid safflower oil, or its blend, to complete dry adult maintenance dog food must meet the following:
      - (i) Addition of the oil or its blend cannot provide more than 36 mg gamma-linolenic acid per kilogram body weight of the dog per day in more than 86 mg of the gamma-linolenic acid safflower oil or its blend. This maximum addition rate of the gamma-linolenic acid safflower oil, or its blend, is 0.3 percent of a complete dry adult maintenance dog food containing 3,600 kilocalories of metabolizable energy per kilogram of food as-fed.
      - (ii) Adjustments must be made for dog food formulas of different caloric density and/or that are fed to specific weights, breeds, or dogs of different activity levels to meet the requirements of this paragraph.
  - (b) To assure safe use of the additive in addition to other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling of the additive shall bear the following:
    - (1) The name, gamma-linolenic acid (GLA) safflower oil.
    - (2) A guarantee for the minimum content of gamma-linolenic acid.
    - (3) Adequate directions for use such that the finished animal food complies with the provisions of paragraph (a)(3) of this section.
- (Adopted 2018) 21 CFR 573.492.
- b) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish **73.045 Pyrophyllite** as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Tim Darden Seconds. MOTION CARRIES**
    - i. 73.045 Pyrophyllite (aluminum silicate monohydrate) may be safely used as the sole anticaking aid, blending agent, pelleting aid, or carrier in animal feed when incorporated therein in an amount not to exceed 2 percent in complete animal feed. 21 CFR 573.900
  - 5) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to Remove Pyrophyllite from Table 73.001 from the AAFCO Official Publication and recommends the same to the membership. I so move. **Jacob Fleig Seconds. MOTION CARRIES**
  - 6) Bob Geiger states the AAFCO Board of Directors rejected this recommendation from IDC to Recommend the Enzyme Marketing Coordination Document in AAFCO Official Publication in Chapter 5 be moved to chapter 6 and embedded in section 30 for lack of clarity and recommends the same to membership. I so move. **Item not voted on Board sent back to Committee.**

**Model Bills 1-6:**

**Report starts on page 39 of the Committee Report Book**

- 1) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee that language as indicated in Attachment B (page 42 of Committee Report Book) be reinserted into the AAFCO Model Bill and recommends the same to membership. I so move.
- 2) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee that language as indicated in Attachment C (page 42 of Committee Report Book) be deleted from the AAFCO Model Bills and Regulations and recommends the same to membership. I so move. **Doug Lueders Seconds. MOTION CARRIES**
- 3) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee that the Pet and Specialty Pet definitions be revised as indicated in Attachment D (page 43 of Committee Report Book) and recommends the same to membership. I so move. **Doug Lueders Seconds. MOTION CARRIES**



- 4) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee that the additions and revisions as indicated in Attachment E (page 43 of Committee Report Book) be made to AAFCO Model Regulation PF4(a) and recommends the same to membership. I so move. **Doug Lueders Seconds. MOTION CARRIES**
- 5) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee that the additions as indicated in Attachment F (page 44 of Committee Report Book) be made to AAFCO Model Regulation PF10 and recommends the same to membership. I so move. **Tim Darden Seconds. MOTION CARRIES**
- 6) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee that the Standard Uniform Interpretation and Policy as indicated in Attachment G (page 44 of Committee Report Book) be added to the AAFCO Official Publication and recommends the same to membership. I so move. **Meagan Davis Seconds. MOTION CARRIES**

**Strategic Affairs Committee 1:**

**Report starts on page 56 of the Committee Report Book**

- 1) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Strategic Affairs Committee, By-Laws changes Article IV - Section 1 and 2, Article V - Section 1 and Article VI - Section 1 to provide clarification regarding the Nominating Committee, constitution and election of the Board of Directors as well as Officers and vacancies and recommends the same to membership. I so move. **Mike Davidson Seconds. MOTION CARRIES**

**By-Laws of the  
Association of American Feed Control Officials, Inc.  
August 12, 2017  
ARTICLE IV  
Officers**

~~Section 1. Officers. The following officers shall be elected by the membership at each annual meeting by a majority vote of those present and voting, and shall serve for the year beginning January 1 of the next calendar year, and ending December 31:~~

~~President, who shall become immediate Past President of the Association on January 1 of the next calendar year following elections.~~

~~President-Elect, who shall become President of the Association on January 1 of the next calendar year following elections.~~

~~Secretary-Treasurer.~~

~~Section 1. Officers. **The President, President-Elect, and Secretary-Treasurer shall be elected by the membership at each annual meeting by a majority of those present and voting, and shall serve for the year beginning January 1 of the next calendar year, and ending December 31.**~~

~~Section 2. Vacancies. If any office other than that of President or President-Elect shall become vacant, a person shall be appointed by the Board of Directors for the remainder of the term. In the event that the office of the President-Elect becomes vacant, the Board of Directors shall fill the office of President-Elect for the remainder of the term. If the office of President shall become vacant, the President-Elect shall thereupon become President of the Association for the unexpired term-provided that such service shall not affect such person becoming President of the Association on January 1 of the next calendar year following elections. In the event that the office of President becomes vacant at a time when the office of President-Elect is also vacant, the Board of Directors shall fill the office of President for the remainder of the term.~~

## ARTICLE V Board of Directors

~~Section 1. Constitution **And Election** of the Board. The Board of Directors shall consist of nine positions including the President, President-Elect, Secretary-Treasurer, Immediate Past-President representing the Executive and five (5) other elected Directors. Each of the elected Directors shall be a member designated under Article II, Section 1 and elected at the annual meeting. The five (5) elected Directors shall be nominated to one of two tiers. Tier 1 shall include two (2) Senior Director positions and Tier 2 shall include three (3) Junior Director positions. Tier 1 Senior Directors may serve successive one-year terms and progress into the Executive positions. Tier 2 elected Junior Directors may serve a maximum of two (2) successive one-year terms and do not progress into the Executive positions unless voted into a Tier 1 Senior Director position. The President shall serve as Chairman of the Board. No two (2) members of the Board of Directors shall represent the same State, Province, Dominion, District, Territory, Republic, Commonwealth or Federal Agency, except that a Board member may be elected from the same State, Province, Dominion, District, Territory, Republic, Commonwealth or Federal Agency as the Secretary-Treasurer.~~

Section 1. Constitution **And Election** of the Board. **(i) The Board of Directors shall consist of eight (8) elected individuals: the President, the President-Elect, the Secretary-Treasurer, and five (5) Directors. The Immediate Past President shall serve as a voting, ex-officio member of the Board. Officers and Directors shall be elected at the annual meeting of the voting members for one (1) year terms. In addition to the slate of candidates proposed by the Nominating Committee, any Association member may make additional nominations by submitting them in writing to the Secretary-Treasurer prior to the vote at the annual meeting. (ii) Each of the elected officers and Directors shall be a member designated under Article II, Section 1. No two (2) members of the Board of Directors shall represent the same State, Province, Dominion, District, Territory, Republic, Commonwealth or Federal Agency, except that a Board member may be elected from the same State, Province, Dominion, District, Territory, Republic, Commonwealth or Federal Agency as the Secretary-Treasurer. (iii) The President shall serve as the Chairman of the Board.**

## ARTICLE VI Committees and Investigators

~~Section 1. Nominating Committee. The Board of Directors shall establish the membership of a Nominating Committee and the conditions and timeframes under which the Nominating Committee shall operate to nominate a slate of candidates for officers and directors for the ensuing year for consideration by the voting members at the annual meeting. After the nominations have been slated and announced, any Association member may make additional nominations by submitting them in writing to the Secretary-Treasurer or make a nomination from the floor prior to the vote at the annual meeting.~~

Section 1. Nominating Committee. **(i) [The Nominating Committee shall consist of the three most immediate past Presidents. If any of the three most immediate past Presidents are unwilling or unable to serve, the remaining members of the Nominating Committee shall select one or more individuals so that the Nominating Committee consists of three individuals.] (ii) The Board of Directors shall establish the timeframes under which the Nominating Committee shall operate to nominate a slate of candidates for officers and Directors for the ensuing year for consideration by the voting members at the annual meeting. (iii) In nominating a slate of candidates for officers and Directors, the Nominating Committee should take into account the following guiding principles, to the maximum extent reasonably possible:**

- The President should ordinarily serve for a single one (1) year term.**

- The candidate for President-Elect should be selected with the assumption that he or she will be nominated for and elected President the following year.
- An individual should have served on the Board of Directors for a minimum of two (2) full calendar years (although not necessarily consecutively) before becoming President-Elect.
- In general, the Directors advance to the officer positions of President-Elect and the following year, to President, in order of tenure.
- An individual's general willingness and ability to serve as a future officer is a relevant, but not a necessary, factor for consideration in selecting nominees for Directors

This concludes committee recommendations needing membership approval. Bob Church motion to Adjourn 10:08am. Scott Ziehr Seconds. MOTION CARRIES

5) **Credential Report – FASS**

Number of Voting Members Represented **32**

Number of States in attendance **43**

Number of Countries **10**

Number of FDA Representatives **0 – Government Shut Down**

Number of Life Members **4**

Total Meeting Attendance **326**

**March 14, 2018 – Kristen Green MOTION to accept minutes. Erin Bubb Seconds. MOTION CARRIES.**

## Current Issues and Outreach Committee Report

2018 AAFCO Midyear Meeting  
January 22, 10:00–10:30 am, Garden Grove, CA (Anaheim)

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

### Committee Participants

**Members Present:** Ali Kashani (WA-Chair), Liz Higgins (NM-Vice-Chair), Tim Darden (NM), Meagan Davis (LA), Tim Lyons (MI), Richard Ten Eyck (OR), Shaness Thomas (FL), Kent Kitade (Life Member)

**Advisors Present:** Leah Wilkinson (AFIA), David Dzanis (APPA), David Fairfield (NGFA), David Meeker (NRA), Jason Vickers (PFI), Tomas Belloso (NGFA), Angela Mills (AFIA)

### Committee Report

The meeting was called to order at 9:05 am PST by Chair, Ali Kashani (WA) Note: due to a change in the General Session, CIOC was started earlier than the listed time.

#### Announcements:

A future meeting topic was proposed to be antimicrobial resistance.

#### Working Group Reports:

**AAFCO News Feed** – Liz Higgins - NM

Liz Higgins (NM) gave an update on the recent AAFCO News Feed (Volume 2, Issue 2) which was published on November 20, 2017.

**Outreach Communication** – Ali Kashani, WA

Outreach communication strategy has been sent out and is available in Feed BIN. Comments are requested. Additionally, volunteers are needed for FSMA Implementation Outreach. Please contact Ali Kashani for more information.

#### Discussion:

**Codex Task Force** – Leah Wilkinson, AFIA:

Leah Wilkinson with the American Feed Industry Association (AFIA) gave a presentation on the 5th Session of the Codex task force on antimicrobial resistance (TFAMR). TFAMR was held Nov. 27-Dec. 1, 2017 in Jeju, South Korea. The American Feed Industry Association (Leah Wilkinson) was there as a member of the U.S. Delegation. The International Feed Industry Federation (IFIF) also had two representatives. The terms of reference include work on animal feed in monitoring and surveillance for AMR and also to modify the code of practice to minimize AMR transfer through feed. FAO/WHO has been asked for expert consultation on a number of topics, including feed. The highest priorities for this FAO/WHO consultation are use of antimicrobials on plants, biocides used in meat processing/food processing and environment. The FAO/WHO consultations will work and the two subgroups on the code of practice and monitoring and surveillance will be working throughout this year. The next TF meeting will be in early Dec. 2018.

AAFCO is monitoring Codex updates and any updates involving animal feed will be posted to the Feed BIN.

**Welcome to California** – Karen Ross, Secretary of the California Department of Food and Agriculture:

Karen Ross, Secretary of the California Department of Food and Agriculture was appointed on January 2, 2011. Secretary Ross addressed the AAFCO membership and discussed the importance of agriculture in California. California is ranked first in the US for agricultural cash receipts and agricultural exports. It is important to have open transparent processes with input from all players involved. She indicated that agriculture is a renewable resource industry and we must look forward and must maintain flexibility to adapt to change. There is an increased interest in all aspects of the food system to eliminate waste and to divert by-products from landfill to other sources including animal agriculture. Agriculture is dynamic and geographic specific – no one size fits all. She welcomed AAFCO members and industry to the midyear meeting.

**NASDA Model Animal Food Safety Implementation Framework** – Dr. Bob Waltz, Office of Indiana State Chemist, Purdue University and Mr. Bob Ehart, Senior Policy and Science Advisor, National Association of State Departments of Agriculture.

Dr. Robert Waltz and Mr. Bob Ehart both presented on the NASDA Model Animal Food Safety Implementation Framework. They are co-leads for this project. The focus of this presentation is the Preventive Controls for Animal Food (PCAF) rule and its implementation in states, through use of the implementation framework. The PCAF Implementation Framework will assist states in making important bridges to FDA's PCAF Rule and the Animal Feed Regulatory Program Standards (AFRPS). The PCAF Framework is intended to assist States in aligning their requirements with FDA's PCAF rule and identifying the specific resources and/or funding model needed for implementation of the aligned requirements.

The challenges for states is determining how best to incorporate PCAF and other FDA rules related to FSMA and animal feeds whether it be by adoption by reference in a statute; adoption of AAFCO model bill and regulations, or adoption in administrative rule with added required authorities in statute. If states do not already have parallel authorities for the following two non-FSMA federal rules (BSE and VFD), states may want to consider including these by reference or enabling language when updating state laws. Funding is another issue. Changes will need to be made to accommodate modifications required by the laws. States will need more inspectors to achieve the same level of inspection as is currently maintained; this will require increased federal funding likely in the form of cooperative agreements, so personnel can be hired.

The implementation framework will be released in 2018 to Commissioners, Secretaries and Directors of Agriculture across the US. Future working groups on elements in the implementation framework that may be difficult issues include human food manufactured but diverted to animal feed; intrastate and interstate support for microbiological analyses; continuing work on trainings to be proficient in preventive controls, and updating the 2108 Implementation Framework.

It is important that states read the implementation framework and discuss its contents with staff, regulated industry, Commissioners et al; and legislators; look at your laws and compare them to PCAF, work and have dialogue with AAFCO FSMA teams to draft state laws that are consistent with other states; begin to work on your state feed program to align the PCAF with your existing or to be developed AFRPS; and volunteer for a NASDA-AAFCO working group to gain expertise and to provide state input on further implementation.

The meeting adjourned at 10:30 am.

**Education and Training Committee Report**  
2018 AAFCO Midyear Meeting  
January 24, 8:00–10:00 am, Garden Grove, CA (Anaheim)

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

**Committee Action Items**

1. Draft Available Course Listing sent to committee for online vote
2. Draft JTA Document to Inspection & Sampling for Comment – 60 Day Comment Period
3. Post Pathlore Presentation on Feed BIN
4. Confirm charge of Workgroup for training review

**Committee Participants**

**Members Present:** David Dressler – PA; Amanda Anderson – KS; Meagan Davis – LA; Jacob Fleig – MO; Liz Beckman – WA; Jim True – KY; Tim Lyons – MI; Samantha Moran – CA; Robert Geiger – IN; JoLynn Otero – NM; George Ferguson – NC; Kent Kitade – Life Member

**Advisors Present:** Scott Ringger – AFIA; David Fairfield – NFGA; Lorri Chavez –PFI; Pat Tovey - PFI

**Committee Members on Phone:** Dave Edwards – FDA;

**Others Present on Phone:** Deirdra Holloway – FDA; Jeffrey Scallan – LA; Marissa Cost – NC; Jennifer Godwin – FDA;

**Committee Report**

**Available Training Course Listing Workgroup – Amanda Anderson**

Discussion regarding the classification of the “basic” and “advanced” courses led to the decision that the Workgroup would note on the document to declare the courses as determined by the Workgroup but allowing for each state to make their own determination. Additionally, some FDA courses were removed from the listing due to the delay of their availability on Pathlore.

**Model Field Training Workgroup – George Ferguson**

The Draft Field Training Manual shall be sent to the Inspection and Sampling Committee via Jim True for comment. The comment period should last 60 days. All comments should be returned to George Ferguson for editing of the document.

**Training Calendar Workgroup – Richard Ten Eyck**

Attachment A: Workgroup Update

**Training Access Through Pathlore – Deirdra Holloway**

Presentation available on Feed BIN

**Other Business:**

1. Preventive Controls Course VM9000W is available online.
2. Training Review and Development

A question was raised as to how we determine if a listed course/training met the desired competencies. It was discussed that there should be a way to determine/evaluate courses, both existing and future courses.

George Ferguson will lead a workgroup\* that will determine the following for feed trainings and courses. In order for AAFCO to assist states Animal Feed Programs meet their training needs/requirements as it relates to program personnel charged with inspection, sampling, compliance as well other areas identified by states, a workgroup was formed to identify, research and provide recommendation back to the committee on the availability and potential use of a Learning Management System (LMS).

The workgroup charge is as follows: To identify a software application that can house, assign, deliver, track and report on the training of AAFCO members.

\*The creation of this workgroup requires the disbanding of the Available Course Listing Workgroup.

This workgroup consists of George Ferguson (lead), Dave Fairfield (NGFA), Jim True (KY), Jacob Fleig (MO), Samantha Moran-Defty (CA), Marissa Cost (NC), Jennifer Godwin (FDA), Robert Geiger (IN).

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing/Status</b>
Amanda Anderson	Available Course Listing	Provide for e-vote	After meeting minute approval.
Amanda Anderson	Pathlore Presentation	Put in Feed BIN	2 weeks
Jim True	Model Training Document	Provide to I&S Committee for comment	60 Days from date of provision to I&S
Work Group	Training Review and Development	Determine Charge	Prior to meeting minute approval

## **Attachment A: Feed BIN Training Calendar Work Group**

On November 28, 2017, Jennifer Roland, Richard Ten Eyck, Jeffrey Scallan, and Scott Ringger participated in a conference call to discuss the utilization of the Feed BIN Calendar for tracking upcoming training events for regulators, the industry, the consumer and other stakeholders.

It was determined that Jeff Scallan will be the training calendar moderator as it's more effective to have only one person maintain the calendar. Jennifer Roland will act as Jeff's backup pertaining to the calendar. Richard Ten Eyck will answer any questions that arise concerning the Feed Bin and the calendar. Scott Ringger will serve as the industry liaison and will let Jeff Scallan know of upcoming relevant industry events.

The group will be to begin utilizing the calendar for tracking these upcoming training events. The next step for the group will be to work on identifying upcoming trainings that will need to be included in the calendar and developing a way to collect this information. Typically, regulatory training events are announced by email through each association or by the regulatory body. Additionally, the group plans to ensure these events are published in the newsletter if time permits.

### **NOTES:**

Work with states to have them notify you if they're having any trainings that others can participate in.

As for FDA face to face trainings and webinars, which are, technically invitation only so to speak but it's good to know when they're happening.

Need to work with Scott Ringger on identifying what public trainings can be made available to the AAFCO stakeholder. Possibly reach out and ensure you have an industry rep from ALL associations (NGFA, AFIA, PFI, NASC, WBF, NRA, etc.) to ensure we have a good idea of what is available to all.



## Feed and Feed Ingredient Manufacturing Committee Report

2018 AAFCO Midyear Meeting  
January 23, 8:00–9:30 am, Garden Grove, CA (Anaheim)

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

### Committee Action Items:

1. Mineral Guidelines Working Group: Revise the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients”.
2. Emergency Response Working Group: Plan 2017 Tabletop Exercise. Work with Education and Training Committee and Jennifer Roland if necessary.
3. FSMA Implementation Task Force – Working Group 3  
Create action plan to determine the processes of implementing the decision making and method development.
4. Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections:  
Perform gap analysis of FSPCA training for inspectors to determine if AAFCO needs to provide additional training for state inspectors.

### Committee Participants

**Members Present:** Austin Therrell – SC (Co-Chair); Eric Brady – TN (Co-Chair); Bob Church – MT; Ken Bowers – KS; Bob Geiger – IN; Mike Davidson - CA; Tim Darden – NM; Ali Kashani – WA; Doug Lueders – MN; ; Laura Scott – CFIA; XXXX - XXXX

**Via Telephone:** Nathan Price - ID

**Advisors Present:** Pat Tovey – PFI; David Meeker – National Renderers Association; Richard Sellers – AFIA; Dan Frank – AFIA; Kim Spinelli – J.M. Smucker; David Dzanis – APPA; David Fairfield – NGFA

### Committee Report

Eric Brady called the meeting to order at 8:01 AM PST. Members and advisors in the room introduced themselves.

**Introductions and Agenda Review, Eric Brady – Austin Therrell**

**Canadian Food Inspection Agency Update - Laura Scott**

**Review of Action Items**

**Mineral Guidelines Working Group – Bill Burkholder**

Expect report after FDA resumes work after shutdown. Able to report at Annual Meeting 2018.

**FSMA IMPLEMENTATION TASK FORCE UPDATES**

**Working Group #3 – Contaminant and Hazard Lab Strategy - Bob Waltz/Mike Davidson**

*Working Group Charge: Following the identification of contaminants and hazards by FSPCA/FDA, the group will determine action levels and enforcement strategies to provide guidance to the Lab Methods and Services Committee (LMSC) in order to develop a priority list of method development. This Working Group will work in consultation with the FSPCA, Enforcement Issues Committee, Inspection & Sampling Committee, Ingredient Definition Committee and the LMSC*

Review of GFI 245 released on January 22, 2018 and begin coordination with LMSC.

**Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections - Mike Davidson**

*Working Group Charge: Review materials developed by FSPCA and FDA to determine whether training material for feed ingredient manufacturing from the FSPCA will meet the needs of Inspectors in regards to training. Working group will work in consultation with the Education & Training Committee and the Inspection & Sampling Committee*

The curriculum for Inspectors from FSPCA can be downloaded online at:

<https://www.ifsh.iit.edu/fspca/fspca-preventive-controls-animal-food>

Linda Morrison – Has a review of this to see what’s missing; a gap analysis may need to be completed?

Response: At this moment, no, a review as not been completed.

**Other Business:**

Schedule committee call with members and advisors, prior to Annual Meeting Agenda Draft due date.  
Austin/Eric

Motion to adjourn

Bob Church makes motion to adjourn and Mike Davidson seconds the motion

09:00 am – Meeting Adjourned

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing/Status</b>
Mineral Guidelines Working Group	Mineral Guidelines	To review and revise the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients”. Working Group: Bill Burkholder (lead), Jon Nelson, Tim Costigan, Jennifer Kormos, David Syverson, Bill Hall, David Dzanis, Roger Hoestenbach (now retired) Will Roger Hoestenbach need to be replaced?	Tentative: July 2018
FSMA Implementation Task Force – Working Group 3	Hazard and Contaminant Action Levels and Enforcement Strategies	Work with FSPCA, EIC, ISC, IDC and LMSC to develop a prioritized list of method development once list of contaminants and hazards has been identified by the FSPCA and FDA. A plan of action should be created by the working group to determine the processes of implementing the decision making and method development.	Update July 2018
FSMA Implementation Task Force – Working Group 4	Inspector Training Development	Gap Analysis performed on FSCPA training to determine if there is any missing education that should be provided to inspectors whom perform feed ingredient manufacturing inspections	Update January 2018

**Feed Labeling Committee Report**  
2018 AAFCO Midyear Meeting  
January 23, 1:30–2:30 pm, Garden Grove, CA

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

**Committee Participants**

**Members Present:** Chair: Dave Dressler (PA); Vice Chair: Dave Phillips (ND); Jason Schmidt (LA), Liz Beckman (WA), Richard Ten Eyck (OR), Miriam Johnson (NC), Erin Bubb (PA), George Ferguson (NC), Tim Darden (NM), Heather Bartley (WI), Al Harrison (KY), Steve Gramlich (NE).

**Advisors Present:** Dave Dzanis (ACVN/APPA), Sue Hays (WBFI), Jan Campbell (NGFA), Chris Olinger (NGFA), Angela Mills (AFIA), Meghan Dicks (AFIA), Pat Tovey (PFI).

**Absent:** Mika Alewynse (FDA), Ed Rod (APPA), Charles Starkey (US Poultry Assn), James Emerson (US Poultry Assn)

**Committee Report**

**Introductions and Agenda Review**

David Dressler called the meeting to order at 1:30 pm PDT. Roll call of members and advisors was taken and a quorum was established.

**Update to Expert Panel for Nutrient Indicators Review for Beef Cattle**

Work group has completed their review and recommended the following:

- Addition of ADF and NDF (maximum) to complete and supplement guarantees.
- Addition of Se to complete and supplement guarantees, if a selenium source is added.

Alan Harrison stated that the work group will need to take a formal vote before recommending to the committee and to provide a timeline to address changes in labeling. Once the working group includes a Model Bill revision, they will send to the Model Bill Committee.

Richard Ten Eyck motions to accept the work group report. Erin Bubb seconds. **MOTION CARRIED.**

**Maximum Guarantees for Nutrients with Toxicity Levels**

Discussion was held to determine if nutrients from Table 2 on page 298 of the 2018 OP “Official Guidelines Suggested for Contaminates in Individual Mineral Feed Ingredients”, when guaranteed should state both a minimum and a maximum guarantees.

A concern was mentioned that mineral levels can change due to other sources of minerals that may be included in the ingredient, such as naturally occurring copper. Since there is a chance for these levels to change based on other ingredients, how big of a gap will be allowed, considering AAFCO limits the tolerance to 20%.

There was mention about forming a workgroup to further discuss. It was recommended that the workgroup that reviewed the NRC be the workgroup to discuss this. It was mentioned that the Feed Manufacturing Committee has a working group that is reviewing Table 2.

Richard Ten Eyck motions to ask current work group from the feed manufacturing committee to establish max recommendations for specific minerals. Dave Phillips seconds. **MOTION CARRIED.**

**Non-Medicated Feed Labeling Guide**

The workgroup has nothing new to report at this time. They are still reviewing the guide and should have a report ready for the annual meeting in Fort Lauderdale.

**Electronic Labeling**

This topic was brought to the committee chair from industry to see if it would be acceptable to allow for feed guarantors to provide labels to customers electronically. With regards to bulk deliveries, they are required to maintain electronic records for DOT requirements, therefore, why not include a complete label as an addition to the DOT records.

There was concern that states may not have the authority to allow electronic labeling to override federal regulations. There could be a conflict between DOT requirements and the requirements of the feed label. No decision was made to move forward with this topic.

### **Non-Medicated Feed Labeling Workshop**

The workshop will be held prior to the AAFCO meeting in Fort Lauderdale. The workgroup is still finalizing the agenda, however potential speakers have been contacted to see if they would be interested in presenting during the workshop. The goal is to have the final agenda complete by April.

### **Direct Fed Microbial Products**

Expiration dates are not required to be present on these products. FDA recommends an expiration date due to organism die-off. Discussion was held to discuss this recommendation.

Mandatory expirations are not necessary, because the label guarantees must be met. Manufacturers are aware that organism die-off happens, which is why they add language to the guaranteed analysis that states "at time of manufacture". Manufacturers are guarantee for typical shelf life in store. What is the life of the product? What is recommended for expiration dates? No commercial feeds have expiration dates. A concern also is that the guarantor would have no way to control how the consumer handles the product after removing it from the retail market. Organism stability is dependent on the composition of the final ingredients and type of organisms.

### **Feed Label Review Software**

The working group has reviewed the program.

The goal of this software is to promote consistency in label review between state regulators, and assist new regulators that might not have experience with label review.

Some concerns that were discussed is that industry feels this may be another obstacle in the process and that Google recently released technology that will allow recognition software. A comment was made to schedule another webinar demonstration since may could not attend the meeting.

Since this project has a cost associated with it, this should be moved to the Board since there is a cost associated with this program.

Steve Gramlich moves to request Board to continue RFP process to determine if costs for feed label review program is economically feasible for AAFCO. Second by Tim Darden. **MOTION CARRIED.**

**Meeting adjourned at 2:40 pm.**

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing/Status</b>
David Dressler	Maximum Guarantees for Nutrients with Toxicity Levels	Present this to the Feed Manufacturing Committee Chair for consideration.	July 2018
Mika Alewynse and Meagan Davis Angela Mills and Thomas Belloso	Non-Pet Food Label Design & Format Guide	Determine recommendations for name change and formatting	July 2018
Workshop Working Group	Non-Medicated Feed Labeling Workshop	Develop agenda and select presenters	April 2018
Dave Phillips	Feed Label Review Software	Approach the AAFCO Board to determine if costs for the feed label review software program is economically feasible for AAFCO.	March 2018

## Ingredient Definitions Committee Report

2018 AAFCO Midyear Meeting  
January 23, Garden Grove, CA (Anaheim)

### Recommendations to the Board and Association Membership:

When needed, new text is presented in the committee minutes, Appendix A.

- 1) Publish the following tentative definitions as Official and remove the existing Official definition if any.
  - a.) T40.100 Recovered Retail Food
- 2) Establish and publish in the OP a new tentative definition(s) for:
  - a) T69.8 Oat Fiber
  - b) T71.40 Low Glucosinolate High Erucic Acid Rapeseed Meal, Solvent Extracted\*\*
  - c) T73.450 Cashew Nut Shell Liquid – add sub section 450-499 antioxidant
  - d) T87.50 Cashew Nut Shell Extract
- 3) Publish in the OP new Official Definitions for:
  - a) 73.020 Ammonium formate
  - b) 73.025 Formic Acid
  - c) Table 18.1 remove **Formic acid** from table on page 363 (2018 OP Print)-
- 4) Budget recommendations from the Chair: (forward to Ali to be considered with budget)
  - a) Establish a reserve of \$20,000 for GRAS and/or AAFCO Definition Process education efforts in support of the GRAS workgroup project.
  - b) Add budget line item of \$1000 for complimentary BIN access (investigators etc). –

**Board Action:** To be considered in April 2018

**Association Action:** To be considered in August 2018

### Committee Report

- 1) **Role Call of Committee members present** (quorum was 22 out of 26 committee members):  
Richard Ten Eyck, Mika Alewynse, Erin Bubb, Brett Boswell, Ken Bowers, Bob Church, Stan Cook, David Dressler, James Embry, George Ferguson, Jacob Fleig, Steve Gramlich, Brett Groves, Alan Harrison, Ali Kashani, Dan King, Kent Kitade, Jennifer Kormos, Mark Le Blanc, Dave Phillips, Nathan Price, Laura Scott
- 2) **Investigator recommendations to move tentative to official**
  - a) T40.100 **Recovered Retail Food** – (Cat) make Official  
Dave Dressler moves to ACCEPT the recommendation and publish the definition as Official in the OP. Jacob Fleig seconds. MOTION PASSES.
- 3) **Work Group Reports**
  - a) GRAS workgroup report – report in Appendix A.  
Related documents are posted in the Feed BIN. Emily Helmes reported that the workgroup (WG) has met twice since December. The workgroup identified and prioritized three projects. Top priority project is: 3.) Identify & pursue state acceptable alternatives to CVM review of the independent GRAS Conclusions. Project 1, which related to education, also has high votes. Project 2 was decided not to be immediately moved forward.  
A summary document was presented with Regulators and Industry's position and where they concur on GRAS self-conclusion topics. Richard Ten Eyck is updating the document and posting in the BIN every couple months.  
AAFCO Board has established a GRAS Policy work group lead by Doug Lueders.
  - b) DFM Nomenclature Changes workgroup – Tamzin  
The WG has met and will be assessing the information in the table to ensure that it is correct.
  - c) Negative List Workgroup (need to form)  
The WG is to establish sharing levels and processes for a negative list. Dave Phillips understands that industry has concerns and wondered what ingredients would be on the list. Is this ingredients that are not safe? Richard Ten Eyck state that this would be ingredients that are not in the OP. Dave Phillips stated that there are pet foods with beef listed in the

ingredients, but there is no definition in the OP. Chris Cowell (PFI) pointed out that there is a negative list in 21 CFR 589. It was also mentioned that there are things that are not in the OP but are common and usual. Richard Ten Eyck stated that he would like the Work group to look at this and assess what can/should be done.

WG members: Kent Kitade (Lead), Cathy Alinovi, Dave Phillips, Leah Wilkinson, Kristi Smedley, Erin Bubb, Betty McPhee, Molly Morrissett, Kristen Green, Padma -CVM, Nathan Price and Richard Ten Eyck.

d) Confusing Pet Food Ingredient Names Workgroup (need to form)

The purpose of this WG is to establish & communicate parameters for separate common name for ingredients that can be confusing to the consumer. These ingredients can also invoke an emotional response by consumers. There was a question if this should be in the Pet Food Committee. Richard Ten Eyck believes that the nomenclature belongs in the IDC. Chris Cowell and George Ferguson believe that the WG name needs to be changed; the WG name has been revised.

Work Group members: Brett Boswell (Lead), Richard Ten Eyck, Jean Hovfe, Molly Morrissett, Leah Wilkinson, Cathy Alinovi, Dave Meeker, Chris Cowell, Erin Bubb, George Ferguson, Nathan Price

e) Guidelines for Requesting Ingredient Definitions Editing Workgroup (need to form)

The purpose of the Work Group will be the following:

- Discuss and edit tentative process in coordination with bylaw committee
- Add draft of definition as step one in the guidelines
- update quantity of copies to CVM

The goal of the WG is to have the edits to the document ready to discuss at March IDC meeting.

Work Group members: Richard Ten Eyck (Lead), Leah Wilkinson, Kristi Smedley, Dave Edwards, Chris Hollinger, Betty McPhee, Laura Scott

**4) New Definitions, Deletes and Edits:**

a) New Feed Term "Livestock" – Ali

Ali Kashani reported that the WG has exchanged emails, but is still debating the definition. Ali Kashani asked that this be put on the August 2018 agenda.

b) New Feed Term "Common and Usual" – Ali

Ali Kashani reported that the WG has exchanged emails, but is still debating the definition. Ali Kashani asked that this be put on the August 2018 agenda.

c) Section 30 header edits (enzymes)

This will be considered with the potential move of the Enzyme Marketing Coordination document (see agenda item 4d below).

d) Move Enzyme Marketing Document to chapter 6 (board rejected and asked for more clarification *Why it can't stay where it is?*) - Mark LeBlanc

*No motion was articulated. Discussion:*

This recommendation was previously moved to the Board, they had questions and asked that this be moved back to the committee for clarification. The Board want to know the purpose of the move. Emily Helmes stated that the ETA did not request the move. She stated that the ETA believes that it makes sense to move the Enzyme Marketing Coordination (EMC) document to Section 30, but are also ok with keeping it where it is. Emily Helmes believes that it may have something to do with the changes to the Section 30 header. Mika Alewynse proposed to move the move EMC document to Chapter 6, because it was originally in front of the enzyme table. She felt that more information was being added to the header and thought that some of this information may be being duplicated. Instead of duplicating information, she thought it would be better to move the document. Mark LeBlanc asked if this document is meant to be a header to section 30. Emily Helmes said that they are different, but we need to know where this document will reside because the header references it. Mika Alewynse said that previously it was in front of the table in Section 30. Mark LeBlanc asked if the plan is to put this document in the header. Mika Alewynse stated that the intent is for it to be in front of the table, and there will no longer be a header to the section except for the nonpathogenic/toxigenic language. Emily Helmes stated that this was not clear in the original request to move the document and is concerned that there is information in the header that is

- not in the Enzyme Marketing Coordination document. She requested that we have time to compare the header text to the document. Stan Cook stated that the Board was concerned that we have a nice clean set of definitions and would be breaking them up with a guidance document. Kristen Green wondered if there was a better way to highlight the information without breaking up the definitions. Mika Alewynse stated when the EMC document was moved to Chapter 5, there was a statement to reference it, but people don't seem to be looking there; FDA was receiving lots of questions. Stan Cook said that there was a motion in the Board to move this change back to IDC. Mark Le Blanc asked that the committee consider this move again. Kristi Smedley asked that this move and the edits to the header to Section 30 be considered together, since they are intertwined. Mika Alewynse and Tamzin Gonzales agreed. Mika Alewynse and Tamzin Gonzalez will request info from ETA before the next meeting and come up with a proposal. **Action: Put on agenda for discussion at next IDC meeting.**
- e) ~~T60.117(B) **Black Soldier Fly Larvae Meal**, board rejected and sent back to IDC, - Erin, Mark LeBlanc (placeholder #1)~~  
More insect coming our way. Crickets
- f) T69.8 **Oat Fiber** – Steve Gramlich  
Dave Phillips moves to ACCEPT the recommendation and publish the definition in the OP as Tentative. Bob Church seconds. MOTION PASSES.  
Nathan Price asked if the definition could say “wet or dry” instead of “wet and dry”? Cathy Peterson stated that she worked on this with CVM. She stated that if it was wet or dry, then the dry form would fit under the oat hull definition. Dave Edwards (FDA) confirmed that “wet and dry” is correct, because the process contains both wet and dry steps.
- g) T71.40 **Low Glucosinolate High Erucic Acid Rapeseed Meal, Solvent Extracted\*\*** - Bob Church  
Bob Church moves to ACCEPT the recommendation and publish the definition in the OP as tentative. Dave Phillips seconds. MOTION PASSES.  
Laura Scott asked for clarification regarding the percent maximums. Dave Edwards (FDA) confirmed that they are the correct percentages. Leah Wilkinson asked about the reference in the investigator report that it can be referred to as LG HEAR meal, how will this be reflected in the definition, can people can use the abbreviated name on the label? Bob Church stated that the full name should be used on the label not the abbreviated name of LG HEAR meal. The \*\* next to the name allows for the solvent extracted portion of the name to be dropped when listing on a finished feed label. Bob Church asked that the LG HEAR meal comment be removed from the investigator's report to avoid confusion.
- h) 73.020 21 CFR update on 573.170 **Ammonium formate** - Richard  
Ali Kashani moves to ACCEPT the recommendation and publish the definition as Official in the OP. Dave Dressler seconds. MOTION PASSES.
- i) 73.025 21 CFR update on 573.480 **Formic acid**, - Richard  
Ali Kashani moves to ACCEPT the recommendation and publish the definition as Official in the OP.. Erin Bubb seconds. MOTION PASSES.
- j) 18.1 remove **Formic acid** from table on page 363 (2018 OP Print)- Richard  
Jacob Fleig moves to ACCEPT the recommendation and update the OP. Bob Church seconds. MOTION PASSES.  
Leah Wilkinson understands the desire to remove the table. However, she encouraged the IDC to keep moving forward with editing/deleting items and not wait until new definitions are needed to avoid confusion on some being in the table and others not. She also asked to make sure the index is correct. She pointed out that currently the OP Index only references formic acid in the table. Kristi Smedley stated that it is helpful for industry to have the table when looking for preservatives and taking pieces out make it less valuable.
- ~~k) 73.046 21 CFR update on 573.940 **Silicon Dioxide** (placeholder #4)~~
- l) T73.450 **Cashew Nut Shell Liquid** – add sub section 450-499 antioxidant, - Richard  
Brett Groves moves to ACCEPT the recommendation and publish the definition as tentative in the OP. Brett Boswell seconds. MOTION PASSES.  
Dave Edwards stated that there are two definitions -- liquid and extract. They are made by different processes and have different uses. Therefore, there are two definitions.

- m) **T87.50 Cashew Nut Shell Extract** --Richard  
Jacob Fleig moves to ACCEPT the recommendation and publish the definition as tentative in the OP. Mika Alewynse seconds. MOTION PASSES.  
Erin Bubb asked if this would be considered a natural flavor. Kristi Smedley answered yes. There was a question if there will there be upper limits on the use of each cashew ingredient. Mika Alewynse stated that each ingredient is assessed and if needed a limit would be determined. Doug Lueders asked why there is a limit of not more than 3percent moisture for the cold pressed liquid Why is this a limit? Dave Edwards stated that the cold pressed material comes out in a liquid form, but it is more of an oil. Kristi Smedley stated they are differentiated between water and oil.

**5) Discussions:**

- a) Does the **Tentative** process need to be applied to every ingredient? – Tabled to March meeting.
- b) **Hemp** Update – Bob C. & Brett B., Scott Z.  
Hollis Glenn (CO Department of Agriculture, Division Director) provided an update. He stated that Colorado established a stakeholder group with regulators and industry looking into the feasibility to add hemp into animal food. The report was released and it outlines a path forward. It was determined that this must be a collaborative effort. The stakeholder group determined that the best path forward would be to file a Food Additive Petition(FAP) with FDA. To help with the submission process, there must be early dialogue with FDA and a plan on what is needed. The Colorado Hemp Industry Association is looking to form a WG to move this FAP forward with willing and knowledgeable participants.  
Brett Boswell has had one firm submit feeding study protocols to FDA and received feedback from FDA.  
There was a question if any states have approved hemp products? No  
Another question was raised as to why products containing hemp are on the market? Chelsea Kent stated that hemp is approved as a supplement. It is questionable use in pet food or pet treats, but they are still supplements. Dave Edwards stated that human supplement rules do not apply to animal food. Stan Cook stated that just because these products exist in the market doesn't mean that they are ok. He also stated that Missouri is removing those products when they come across them. Richard Ten Eyck directed people to look at the AAFCO website home page for the hemp white paper.
- c) GRAS policy discussion -- cover in the GRAS workgroup report (see agenda item 3a)
- d) Standard of Identity Template Functions (placeholder) – not discussed at this meeting
- e) Status on high profile ingredients (if needed) – Richard / CVM – not discussed at this meeting
- f) Discussion of common human foods in pet food (placeholder)- not discussed at this meeting
- g) Any activities needing 18-19 Association funding? Recommend a reserve of \$20K for GRAS and Definition Process educational efforts.
- h) Set Webinar **meeting dates** for 2018  
Proposed dates are 3/30/18 and 10/5/2018. March 30<sup>th</sup> is Good Friday. The IDC preferred not to have a meeting on this date. Richard Ten Eyck will send a doodle to figure out an alternate date.  
Next meeting is 4/19/18. Check the BIN and AAFCO.org for connection details.

Meeting Adjourned. Minutes approved 3/21/2018 with 17 Affirmative votes.



## Appendix A: 1/23/18 IDC Meeting

GRAS workgroup report: 1/5/18

WORKGROUP SCOPE: Deal with details and issues surrounding independent GRAS conclusions without a no-questions letter from FDA.

### Goal 1.) (done 1/3/18) Establish language for work group project(s) scope:

\*Project 1.) Provide Industry, consumers and regulators information about the FDA law & regulations applicable to GRAS substances.

Project 2.) Identify & pursue solutions to CVM review resources above and beyond GRAS notifications.

\*\*Project 3.) Identify & pursue state acceptable alternatives to CVM review of independent GRAS conclusions.

\*\* Top Priority

\* Second Priority

### Goal 2.) (done 1/3/18) Prioritize Projects: 3--1--2

Next steps: 1.) Update status document

2.) Meet again (after Anaheim)

### Text of Definition Recommendations accepted by IDC 1/23/18

**T40.100 Recovered Retail Food** is composed of edible human food products safe and suitable for livestock feed that are collected from retail food establishments, domestic holding facilities, and domestic packing facilities. Permitted recovered retail foods are products from overstocks, lacking consumer acceptance, or beyond their sell-by date that include items such as bruised, cut, or overly ripe produce (fruit and vegetables), bakery goods, eggs, and dairy products. It shall be safe and appropriately labeled for its intended use and shall be free of material harmful to animals. Materials excluded from this definition include pet foods, products containing beef, lamb, pork, poultry, fish, or shellfish. It must not contain packaging materials (e.g., plastics, glass, metal, string, Styrofoam, cardboard, and similar materials), flowers, potted plants, or potting soil. The recovered foods shall be collected and intermixed in secure holding containers to exclude unauthorized addition of trash, materials harmful to animals, or infestation and adulteration by pests. Egg and dairy products (and other products ordinarily held at refrigerator temperatures) must be kept in cold storage until the scheduled pick-up. To minimize spoilage, the recovered retail food shall be collected at least weekly, or more frequently if necessary. The establishment should have a sanitation plan in place, and the containers should be cleaned and sanitized as necessary. The collected material may be further processed or delivered as is to an animal feeding facility. The product must be handled to preserve its safety and nutritional value. (Proposed 2017, adopted xx )

**T 69.8 Oat Fiber** is obtained from oat hulls that have been processed through a continuous wet and dry process to modify soluble and insoluble fractions of the fiber, and to reduce the content of lignin. The ingredient must be guaranteed for neutral detergent fiber, acid detergent fiber, and acid insoluble lignin. Oat fiber is to be used a source of insoluble fiber in animal feed and pet food. (proposed xx)

**T 71.40 Low Glucosinolate High Erucic Acid Rapeseed Meal, Solvent Extracted\*\*** is the meal obtained after the removal of most of the oil by the prepress solvent extraction of whole seeds obtained from the genus Brassica (Brassica napus, Brassica rapa (formerly B. campestris), or Brassica juncea) from which the oil shall contain more than 2% erucic acid and the solid component shall contain less than 30 micromoles of any one or any mixture of 3-butenyl glucosinolate, 4-pentenyl glucosinolate, 2-hydroxy-3-butenyl glucosinolate and 2-hydroxy-4-pentenyl glucosinolate, and allyl glucosinolate per gram of air dry, oil free solid. It must contain a maximum of 2% erucic acid, a maximum of 12% crude fiber and a maximum of 30 micromoles of glucosinolates per gram. It is used in the diets of animals as a source of protein, in accordance with good feeding practice. (proposed xx)

**T 73.450 Cashew Nut Shell Liquid** is the heat extracted liquid from cashew nut shells to be used as an antioxidant in fats and oils (excluding highly unsaturated oils with iodine value higher than 150) that are suitable for use in animal food. Cashew nut shell liquid can be used at levels up to 6000 mg/kg in fats and oils.

The level of cashew nut shell liquid in complete feed must not exceed 600 mg/kg. The liquid ingredient must contain, and be guaranteed for, not less than 10% cardol, not less than 55% cardanol, and not more than 1 % moisture. (Proposed xx, xx)

**T87.50 Cashew Nut Shell Extract** is the mechanical cold-pressed liquid from cashew nut shells to be used as a flavor additive in cattle feeds in amounts not to exceed 500 ppm in complete feed. The liquid ingredient must contain not less than 59% anacardic acid, not less than 18% cardol, and not more than 3% moisture. Minimum percent anacardic acid must be guaranteed. (Proposed xx)

### **73.020 Ammonium Formate**

The food additive, ammonium formate, may be safely used in the manufacture of complete swine feeds in accordance with the following prescribed conditions:

- (a) The additive is manufactured by the reaction of 99.5 percent ammonia gas and 99 percent formic acid in a continuous loop reactor to produce a solution made up of 37 percent ammonium salt of formic acid and 62 percent formic acid.
- (b) The additive is used or intended for use as a feed acidifying agent, to lower the pH, in complete swine feeds at levels not to exceed 1.2 percent of the complete feed.
- (c) **To ensure safe use of the additive, formic acid and formate salts from all added sources cannot exceed 1.2 percent of complete feed when multiple sources of formic acid and its salts are used in combination.**
- (d) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act (the act), the label and labeling shall contain:
  - (1) The name of the additive.
  - (2) Adequate directions for use including a statement that ammonium formate must be uniformly applied and thoroughly mixed into complete swine feeds and that the complete swine feeds so treated shall be labeled as containing ammonium formate.
  - (3) **Cautions for use including this statement: Caution: Follow label directions. Formic acid and formate salts from all added sources cannot exceed 1.2 percent of complete feed when multiple sources of formic acid and its salts are used in combination.**
- (e) To ensure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act and paragraph (d) of this section, the label and labeling shall contain:
  - (1) Appropriate warnings and safety precautions concerning ammonium formate (37 percent ammonium salt of formic acid and 62 percent formic acid).
  - (2) Statements identifying ammonium formate in formic acid (37 percent ammonium salt of formic acid and 62 percent formic acid) as a corrosive and possible severe irritant.
  - (3) Information about emergency aid in case of accidental exposure as follows:
    - (i) Statements reflecting requirements of applicable sections of the Superfund Amendments and Reauthorization Act (SARA), and the Occupational Safety and Health Administration's (OSHA) human safety guidance regulations.
    - (ii) Contact address and telephone number for reporting adverse reactions or to request a copy of the Material Safety Data Sheet (MSDS). 21 CFR 573.170 (Proposed 2011, Adopted 2013, Amended 2017, amended xxx)

**73.025 Formic Acid** is manufactured by heating carbon dioxide and NaOH under pressure and decomposing the resulting sodium formate with H<sub>2</sub>SO<sub>4</sub>, the resulting formic acid, CH<sub>2</sub>O<sub>2</sub>, has a molecular weight of 46.02. The food additive, formic acid, may be safely used in accordance with the following conditions:

- (a) The additive is used as a preservative in hay crop silage in an amount not to exceed 2.25 percent of the silage on a dry weight basis or 0.45 percent when direct cut, as follows:
  - (1) The top foot of silage stored should not contain formic acid and
  - (2) Silage should not be fed to livestock within 4 weeks of treatment.
- (b) The additive is used or intended for use as a feed acidifying agent, to lower the pH, in complete swine **and poultry** feeds at levels not to exceed 1.2 percent of the complete feed.
  - (1) The additive consists of not less than 85 percent formic acid (CAS 64-18-6).
  - (2) The additive meets the following specifications:
    - (i) Free methyl alcohol not to exceed 1,000 parts per million (ppm);
    - (ii) Methyl formate not to exceed 1,000 ppm; and

- (iii) Moisture not to exceed 15 percent.
- (3) To ensure safe use of the additive, formic acid and formate salts from all added sources cannot exceed 1.2 percent of complete feed when multiple sources of formic acid and its salts are used in combination.**
- (4) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug and Cosmetic Act, the label and labeling shall contain:
  - (i) The name of the additive.
  - (ii) Adequate directions for use including a statement that formic acid must be uniformly applied and thoroughly mixed into complete swine feeds and that the complete swine feeds so treated shall be labeled as containing formic acid.
  - (iii) Cautions for use including this statement: Caution: Follow label directions. Formic acid and formate salts from all added sources cannot exceed 1.2 percent of complete feed when multiple sources of formic acid and its salts are used in combination.**
- (5) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act and paragraph **(b)(4)** of this section, the label and labeling shall contain:
  - (i) Appropriate warnings and safety precautions concerning formic acid (85 percent formic acid).
  - (ii) Statements identifying formic acid (85 percent formic acid) as a corrosive and possible severe irritant.
  - (iii) Information about emergency aid in case of accidental exposure.
    - (A) Statements reflecting requirements of applicable sections of the Superfund Amendments and Reauthorization Act (SARA), and the Occupational Safety and Health Administration's (OSHA) human safety guidance regulations.
    - (B) Contact address and telephone number for reporting adverse reactions or to request a copy of the ~~Material~~ Safety Data Sheet (**MSDS**). 21 CFR 573.480 (Proposed 2011, Adopted 2012, 2013, Amended 2015 rev. 1, 2017, amended xxx)

**Inspection and Sampling Committee Report**  
2018 AAFCO Midyear Meeting  
January 22, 11:00 am–12:00 pm, Garden Grove, CA (Anaheim)

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

**Committee Action Items:**

1. Aseptic Sampling Work Group Charge: to evaluate current protocols for aseptic sampling. The group includes the following members: Miriam Johnson (Lead) – NC, Tim Lyons – MI, Jacob Fleig – MO, Kevin Klommhaus – FDA, Jan Campbell – NGFA, Stephanie Adams – AFIA
2. AAFCO Inspectors Manual FSMA Alignment Work Group Charge – to review the AAFCO Feed Inspector’s Manual to ensure it aligns with FSMA requirements. The group includes the following members: Kevin Klommhaus (Lead) – FDA; Brett Groves – IN; Jim True – KY.
3. Sampling Study RFP Work Group Charge: Write a Request for Proposal in which current sampling methods will be re-validated through independent peer reviewed research. Once the RFP is approved by the Inspection and Sampling Committee it will be sent out to the appropriate venues for proposal to conduct the study. This workgroup will not write the parameters around how to conduct the study but instead determine the data we would like to collect from the study. The group includes the following members: Miriam Johnson (Lead) – NC, Bob Geiger – IN, Jenny Combs – KY, Samantha Moran – CA, Aaron Price (Lab Methods & Services Committee Representative) – CAN, Kent Kitade.
4. AITS & BITS Alignment Work Group Charge: Review current guidance document for hosting AITS & BITS and establish a consistent curriculum for future AITS seminars. The group includes the following members: Meagan Davis (Lead) – LA, Miriam Johnson – NC, Chad Linton – WV, Brett Groves – IN, David Dressler – PA, Amanda Anderson – KS, Eric Brady – TN, Barb Schroeder – MN, Kevin Klommhaus – FDA, Stephanie Adams – AFIA.

**Committee Participants:**

**Members Present:** Miriam Johnson – NC (Committee Chair); Stan Cook – MO; Bob Church – MT; Brett Groves – IN; Meagan Davis – LA; David Dressler – PA; Laura Scott – CAN; Jim True – KY; Mike Davidson – CA; Jacob Fleig – MO; Barb Schroeder – MN;

**Advisors Present:** Meghan Dicks – AFIA; Jan Campbell – NGFA; Chris Olinger – NGFA; Stephanie Adams – AFIA

**Committee Report**

Miriam Johnson (Committee Chair) called the meeting to order at 11:15 AM PST. Members and advisors in the room introduced themselves.

**Aseptic Sampling Work Group – Miriam Johnson**

A work group was formed during the 2017 Midyear Meeting in Mobile, AL to address missing procedures for bulk aseptic sampling in the sampling procedures section of the AAFCO Feed Inspector’s Manual.

**Work Group Update:**

The work group has been in touch, is reviewing the Aseptic Sampling sections of both the AAFCO Feed Inspector’s Manual and the FDA IOM, and continues to determine the direction in which the updates/revisions need to follow. At this time the group is considering that in lieu of developing/updating the AAFCO Feed Inspector’s Manual with guidance on the actual physical collection of an aseptic sample (ie how to collect a sample from a bulk pile or from a bag/package) that it would most likely be more useful to develop/update the technique of collecting an aseptic sample (Examples: how to avoid cross contamination of the sample and the equipment, possibly chain of custody, maintaining sample integrity, and anything additional the group may come up with).

**Discussion from the Audience:**

Richard Sellers with AFIA stated that an Aseptic Sampling Video is being developed by the University of Arkansas and Kansas State University and wondered if the work group would find this video helpful in further developing and reviewing the current information available to inspectors. It was agreed that yes, when the video became available the group would like to utilize the information within to further assist in updating the Aseptic Sampling Section of the AAFCO Feed Inspector's Manual.

**Work Group Members:** Miriam Johnson (Lead) – NC; Jacob Fleig – MO; Tim Lyons – MI; Kevin Klommmhaus – FDA Advisor; Jan Campbell – NGFA; Stephanie Adams – AFIA

**AAFCO Feed Inspector's Manual and FSMA Alignment – Miriam Johnson & Brett Groves****Work Group Update:**

A review of the AAFCO Feed Inspector's Manual is being performed to ensure it is aligned with the requirements of FSMA. A work group was formed and provided a deadline of August 2018 to complete this task. Updates were presented at the Annual Meeting in Bellevue, WA in Aug of 2017 however the work group did determine that it would conduct a second edit to align the additional information added to match the current formatting of the AAFCO Feed Inspector's Manual. Kevin Klommmhaus was unable to be present during this meeting, however he is continuing to make the updates and will have newly formatted proposed additions for the committee to review for the Annual Meeting in Fort Lauderdale in July of 2018.

**Work Group Members:** Kevin Klommmhaus (Lead) – FDA; Brett Groves – IN; Jim True – KY

**AAFCO Sampling Study – Miriam Johnson****Work Group Update:**

Since the Annual Meeting held in Bellevue, WA in August of 2017 a work group was formed to create a Report for Proposal to conduct a sampling study. The charge of the work group is to write a Request for Proposal in which current sampling methods will be re-validated through independent peer reviewed research. Once the RFP is approved by the Inspection and Sampling Committee it will be sent out to the appropriate venues for proposal to conduct the study. This workgroup will not write the parameters around how to conduct the study but instead determine the data we would like to collect from the study. Discussion with the work group revealed the RFP created will request a study that evaluates our current bagged sampling techniques used, for various feed types (ex. Crumbles, textured, pellet, mash product, etc.) using the 3 most common sampling techniques used (hand grab, single and double probe). The analytes the workgroup is proposing to be tested include Protein, a nutrient similar to Calcium or Phosphorus, and a micro analyte such as Vitamin A. The RFP will be completed by the Annual Meeting in Fort Lauderdale, FL in Aug 2018.

**Discussion from the Audience:**

Sharon Webb with the University of Kentucky (Lab Methods and Services Committee) recommended the workgroup consider testing an analyte such as zinc due to the difficulty to detect the presence of micro nutrients such as Vitamin A or C with in a sample.

**Work Group Members:** Bob Geiger – IN; Jenny Combs – KY; Samantha Moran – CA; Kent Kitade; Aaron Price – CAN (Lab Methods & Services Committee Representative)

**AITs Seminar Review – Meagan Davis**

AITs for 2018 will be hosted by MO and KS in Kansas City, MO in June of 2018. More information will be made in the upcoming agenda.

The Alabama Department of Agriculture has offered to host the 2019 AITs seminar. Further information will become available as received.

**BITs Seminar Review – Meagan Davis**

BITs was held Oct. 24-26, 2017 in Boise, ID. 59 attendees representing 22 states were present for the seminar.

The 2018 BITs seminar will be hosted by the Pennsylvania Department of Agriculture. The proposed time in which the seminar will be hosted is September 2018.

The Michigan Department of Agriculture has offered to host the 2019 BITs seminar. Further information will become available as received.

**AITs & BITs Alignment Workgroup – Meagan Davis****Workgroup Update:**

A workgroup was formed prior to the Midyear Meeting in Anaheim, CA 2018. The charge of the work group is to review current guidance documents for hosting AITs and BITs and establish a consistent

curriculum for future AITS seminars. The work group is looking into incorporating a customized portion of the curriculum through CLEAR and will be working with the Education and Training Committee to explore this option. Discussion to add BITS as prerequisite for AITS revealed this is currently not spelled out in the AITS guidelines, but if added could be an issue with funding within the States due to availability of monies and hire dates of inspectors. This will be further discussed to determine if this will be incorporated into the AITS guidelines moving forward. During the committee meeting it was determined that Brett Groves would be the lead for maintaining the BITS Guidelines and Meagan Davis would be the lead for maintaining the AITS Guidelines.

**Workgroup Members:** Meagan Davis (Lead) – LA; Miriam Johnson – NC; Chad Linton – WV; Brett Groves – IN; Eric Brady – TN; Amanda Anderson – KS; Barb Schroeder – MN; Dave Dressler – PA; Stephanie Adams – AFIA

**Other Business:**

The Education and Training Committee has developed a Field Training Manual to track field staff training as part of the Strategic Plan. The work group developing this manual would like for the Inspection and Sampling Committee to review the document for content to ensure there are no obvious gaps in the proposed tracking guidelines. Comments and feedback were requested to be returned within 60 days of receiving the document, which will be sent out at the end of the 2018 Midyear Meeting. Jim True volunteered to be the liaison for Inspection and Sampling to the workgroup. He will compile the comments and feedback received by the Inspection and Sampling Committee to take back to the Education and Training Committee Workgroup for further action.

No further discussion or topics were brought to the attention of the committee and the meeting was adjourned at 11:47 am.

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing/Status</b>
Work Group	Aseptic Sampling	Develop protocol for techniques of aseptic sampling	Unknown
Work Group	Feed Inspector's Manual	Ensure the manual aligns with FSMA requirements	July 2018
Work Group	Sampling Study	Develop Report for Proposal for Sampling Study	July 2018
ISC	ETC Field Training Manual	Review for content and return to ETC in 60 days	April 2018
Work Group	AITS Guidelines	Update and Standardize AITS Guidelines & Curriculum	April 2018

## Laboratory Methods and Services Committee Report

2018 AAFCO Midyear Meeting  
January 23, 8:00 am–5:00 pm, Garden Grove, CA (Anaheim)

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

### Committee Participants

**Members Present:** Aaron Price, CFIA; Nancy Thiex, Life Member; Josh Arbaugh, West Virginia Dept. of Agriculture; Ametra Berry, Georgia Dept. of Agriculture; Deepika Curole, LSU Dept. of Ag Chemistry; Teresa Grant, North Carolina Dept. of Agriculture; Casey Guccione, Kansas Dept. of Agriculture; Heidi Hicke, Montana Dept. of Agriculture; Halina Inerowicz, Office of the Indiana State Chemist; Jason Kong, Ohio Dept. of Agriculture; Kristina McCallum, Colorado Dept. of Agriculture ; Louise Ogden, Life Member; Lise-Anne Prescott, CFIA; Brenda Snodgrass, Oklahoma Department of Agriculture ; Robert Sheridan, New York Dept. of Agriculture; Michele Swarbrick, Minnesota Dept. of Agriculture; Lei Tang, FDA CVM; Sharon Webb, University of Kentucky Regulatory Services ; Sara Williams, Office of the Texas State Chemist

**Advisors Present:** Kyle Bennett, Neogen; Andy Crawford, Consultant; Jeff Horst, Agri-King; Lars Reimann, Eurofins; Ken Riter, Pet Food Institute; Lisa Ruiz, Eurofins NAC; John Szpylka, Merieux Nutri Sciences

### Committee Report

- 1.) Call to Order  
The Agenda was approved with minor changes.  
Introductions – sign-up sheet sent around.
- 2.) Committee Roster was reviewed and updated. Aaron Price will add additional updates as needed. There is a need to transition leadership of the Committee since Aaron and Nancy Thiex will be stepping down after the annual meeting. Nancy and Aaron recommend that the 2019 Committee agenda items need to be a team approach instead of 1 or 2 individuals. Please let Aaron and Nancy know if you are interested or can suggest candidates (note that they have to be employed by a regulatory agency).
- 3.) FDA update – due to government shutdown, no one representing FDA was able to attend the meeting in person to give an update.
- 4.) FSMA Implementation Task-Force – Still waiting for feedback from FDA as to the testing needed.
- 5.) Working Group updates
  - a. Tylosin – Leo Shilling provided an update. He is still working on the method in his lab and seeking input from the LMSC and stakeholders for participation and industry and FDA guidance for the upcoming method validation protocol.
  - b. CTC – Leo Shilling reported that he had received good response to his survey even though some of the responses lacked detail. He is looking for volunteers to help identify the appropriate method including touching base with Tom Phillips to avoid reinventing the wheel. Leo hoped to be able to provide more information at the next meeting.
  - c. Fat soluble vitamins – Dorota Inerowicz and Ken Riter are looking for participants in their ring trial study to provide the validation data behind their methods. It was agreed that separation of 13-cis-retinol was an advantage and to focus on quantifying alpha –tocopherol due to its higher biological activity among the tocopherols. Issues to consider when reviewing data were test portion mass, hot versus cold saponification, liquid/liquid extraction versus SPE, and a simple neutralization/dilution approach.  
The first study performed by MN Department of Ag will center on the test portion mass needed to ensure a representative sample.
  - d. Multi-element (mineral) analysis – Robert Sheridan reported on his single lab validation that looked at 27 elements. Samples were spiked at 2x the LOQ as well as the middle of the

operational range. Samples examined included feeds, feed ingredients plus some old AAFCO samples. The method was based on microwave digestion followed by either ICP-OES or ICP-MS (no clear benefit with either technique).

Michele Swarbrick reported on her survey that most labs used a test portion mass between 0.1 g to 1.0 g and either ICP-MS or ICP-OES. Some labs used both techniques depending on the concentration and nature of the analyte.

Lise-Anne Prescott reported that the Canadian Food Inspection Agency uses an on-line diluter to ensure that the analyses are performed in the “sweet” spot of the analytical range.

The workgroup recommends a best-practice guide to test portion mass and methodology.

- e. Sugar method – Nancy Thiex and John Szpylka reported that the SMPR for “sugars” had been posted on the AOAC website and for people to provide feedback ASAP. An SMPR on fructans should be posted soon.
- f. Dietary Starch - Lars Reimann reported that the Dietary Starch method developed by Dr. Mary Beth Hall had been awarded “Final Action” status and that this issue was now closed.
- g. Mycotoxin – Bob Sheridan reported on the results from the AAFCO PT data. Following the development of an ISO method addressing mycotoxin residues there have been little further development on this issue in the US.  
Lars and Nancy mentioned the method alignment efforts by the DDGs manufacturers headed by Shon van Hulzen with Poet.
- h. Best practices – Larry Novotny reported on the final draft off the “white paper” addressing moisture. The WG has completed its work and has been disbanded. The white paper has been distributed for comments and final approval.

It was suggested that the next subject to focus on would be “Nitrogen to Protein Conversion Factors”. Discussion followed as to the political and science aspects of this issue.

Fiber Best practices is being rewritten and expanded and will be published in the JAOAC

- 6.) Proposal to BOD for placing fat method references on labels – there were general consensus that doing so was a bad idea (too much “stuff” on a label already; of no value to the consumer).
- 7.) Mycotoxin best practices – Nancy Thiex reported that Distillers Grain Council had developed a working group currently with 43 participants. Goal for the group is to produce scientifically supported, publishable best practices recommendations. However only 6 people had contributed material so far and it has become an administrative nightmare. Nancy chaired this WG by default and asked for help in locating good candidates for chapter editors (lead authors). John Szpylka to provide Nancy with a list of the committee members for the AOAC Mycotoxin committee.

The following people volunteered (or were “voluntold”)

Kyle Bennett	Test kits
Bob Sheridan & Sharon Webb	Instrumental analyses
Lei Tang	Regulations

- 8.) FDA Cooperative Agreement – Yvonne Salfinger reported that the program had received a “no cost extension” through 2018 to complete several tasks in the pipeline including accreditation of PT program, updating of laboratory sampling guidelines and producing webinars and lab workshops. The “Good Test Portions” is in its final stage prior to publication. A study focused on test portions will be issued soon. Focus on high, medium and low concentration analytes as a function of sample handling methods. The Sampling section on the AAFCO Laboratory Web Page is being developed.
- 9.) Test portion size for the analysis of milk replacers for nutrients – Nancy Thiex reported on receiving a request highlighting the issues associated with the analysis of nutrients in milk replacers including the selection of nitrogen factors, test portion size for nutrients and specific issues associated with the analysis for crude fat, crude fiber and salt. A recommendation for a best practice guide was discussed to include standardizing the preparation for the method, and not following the dilution ratio given by the manufacture. The guide would also address best practice recommendation for matrices that form suspension in an aqueous solvent.
- 10.) Cationic Soaps in feeds – Issue was brought forth by members of KS Dept of Ag. It was agreed that soaps are poorly quantified by simple solvent extraction and that the optimal approach would be the FDA recommended method for “Total Fat in Food”.
- 11.) AAFCO-NASDA WG – Nancy Thiex reported that the WG is working within the PCAF framework writing a “Laboratory Services” Chapter.



- 12.) State Feed Lab Network (Centers of Excellence) – Nancy Thiex reported that the workgroup had prepared a position paper on the issue that had been submitted to the AAFCO BoD 1+ year ago and currently the Working group is in the process of putting together 2 surveys – a survey of needed analyses currently not available in state labs as well as services offered by state labs. AAFCO had requested a “White Paper” stressing the sharing of resources beyond feed.
- 13.) Quality Assurance Sub-Committee – ISO 17025 has been revised. AOAC is updating its ALAC document to ensure compliance and is expecting to publish the final document this summer. Per A2LA labs will be given 2 years from the time the doc is published to become compliant with the new standard.
- 14.) Laboratory Sampling Program – Nancy Thiex provided an update on the “Guidance on Obtaining Defensible Test Portions” (aka “Good Test Portions”). The original document was written in 2000 but is now being updated. Discussion where a 2-day training seminar would be held (e.g., in connection with an AOAC meeting and whether a WebEx option should be included). Chief consideration between the two plans: which method will reach more of the people who need this training?
- 15.) Round table discussion:
  - a. ISO 17025:2017: This edition includes changes in scope; a lot has changed in terms new technology and techniques, and, accordingly, the sections are numbered differently from the previous edition. Laboratories already accredited to ISO/IEC 17025:2005 will need to transition their processes to the new version within a three-year period from the publication date of the new standard. Quality management systems that refer to specific chapters will need to be updated to the current format in the 2017 edition.

**Action Item Table**

<b>Responsible</b>	<b>Item no.</b>	<b>Action</b>	<b>Timing/Status</b>
A Price	2	Update committee roster based on recent changes and submit to AAFCO BOD	End of March, 2018
All committee members	2	Consider whether you would like to become a co-chair or vice-chair of the committee and respond to N Thiex and A Price if interested	Mid April, 2018
All committee members	3b	Consider whether you are able to assist L Schilling to identify appropriate Chlortetracycline methods for further study	Mid April, 2018
All committee members	3c	Consider whether your lab is able to volunteer for the fat-soluble vitamins ring trial. Contact D Inerowicz and K Riter if interested.	End of March, 2018
J Szpylka	7	To provide N Thiex with a list of the AOAC Mycotoxin Committee members	End of March, 2018

## Appendix

For a list of presentations given during this meeting, please see the AAFCO Laboratory Methods and Services committee website at the following link:

<https://www.aafco.org/Regulatory/Committees/Laboratory-Methods-and-Services#minutes>

### Attendee List

Last Name	First Name	Affiliation	E-mail	Present
Arbaugh	Josh	West Virginia Dept. of Ag	jarbaugh@wvda.us	X - Member
Bailie	Jenny	Milk Specialties	jbailie@milkspecialties.com	X
Bennett	Kyle	Neogen	kbennett@neogen.com	X - Advisor
Berry	Ametra	GA Dept. of Agriculture	ametra.berry@agr.georgia.gov	X - Member
Caldwell	Jane	Midwest Laboratories	jcaldwell@midwestlabs.com	X
Crawford	Andy	AAFCO PTP	andy@crawford.org	X - Advisor
Curole	Deepika	LSU Dept. of Ag Chemistry	dcurole@ldaf.state.la.us	X - Member
Flowers	Sally	Nebraska Dept. of Ag	sally.flower@nebraska.gov	X
Grant	Teresa	NC Dept. of Agriculture	teresa.grant@ncagr.gov	X - Member
Guccione	Casey	KS Dept. in Ag	casey.guccione@ks.gov	X - Member
Ha	Tai	Nebraska Dept. of Ag	tai.ha@nebraska.gov	X
Hickes	Heidi	MT Dept. of Ag	hhickes@mt.gov	by phone - Member
Horst	Jeff	Agri-King, Inc.	jeff.horst@agriking.com	X - Advisor
Huyghuesdespointes	Alexis	JH Smuckers	alexis.huyghuesdespointes@jmsmucker.com	X
Inerowicz	H. Dorota	OISC	inerowic@purdue.edu	X - Member
Kong	Jason	Ohio Dept. of Agriculture	Jason.Kong@agri.ohio.gov	X - Member
Koestner	Mary	Missouri Dept. of Ag	mary.koestner@mda.mo.gov	X
Levin	David	Covance	david.levin@covance.com	X
McCallum	Kristi	CO Dept. of Agriculture	kristina.mccallum@state.co.us	by phone - Member
Mostyn	Paul	Westway Feed	paulm@westwayfeed.com	X
Muenks	Quintin	MO Dept. of Ag	quintin.muenks@mda.mo.gov	X
Nobo	David	KS Dept. in Ag	david.nobo@ks.gov	X
Novotny	Lawrence	SD - retired	lawrence.novotny@sdaglabs.com	by phone
O'Mara	Lauren	UK Reg. Services	lauren.omara@uky.edu	X
Ogden	Louise	AAFCO	pt@aafo.org	X - Member
Pietrzen	Karen	Michigan Dept. of Ag	pietrzenk@michigan.gov	X
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Price	Aaron	CFIA	Aaron.Price@inspection.gc.ca	X - Co-chair
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Riter	Ken	Nestle-Purina Analytical Labs	ken.riter@purina.nestle.com	X - Advisor
Ruiz	Lisa	Eurofins NAC	lisaruiz@eurofins.com	X - Advisor
Rygiel	Teresa	FL Dept. of Ag	theresa.rygiel@freshfromflorida.com	X
Salfinger	Yvonne	APHL	yhale@aol.com	X
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Scheaffer	Abe	SweetPro Feeds	abe@sweetpro.com	X
Schilling	Leo	Eurofins	LeoSchilling@eurofinsus.com	X
Sheridan	Robert	NY Dept. of Ag	robert.sheridan@agriculture.ny.gov	X - Member
Sikora	Frank	University of Kentucky	fsikora@uky.edu	X
Snodgrass	Brenda	OK Dept. of Ag	Brenda.Snodgrass@ag.ok.gov	X - Member
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Swoboda	Christy	Romer Labs	christy.swoboda@romerlabs.com	X
Szpylka	John	Merieux Nutri Sciences	john.szpylka@mxus.com	X - Advisor

<b>Last Name</b>	<b>First Name</b>	<b>Affiliation</b>	<b>E-mail</b>	<b>Present</b>
Tang	Lei	FDA CVM	lei.tang@fda.hhs.gov	by phone - Member
Taylor	Julie	Cargill Inc.	jtaylor@provimi.na.com	X
Thiex	Nancy	Life Member	nancy.thiex@gmail.com	X - Co-chair
Watkins	Victoria	KS Dept. of Ag	victoria.watkins@ks.gov	X
Webb	Sharon	UK Reg. Services	sharon.webb@uky.edu	X - Member
Weiss	Chris	IFPTI	chris.weiss@ifpti.org	X
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## Model Bills and Regulations Committee Report

2018 AAFCO Midyear Meeting  
January 22, Garden Grove, CA (Anaheim)  
Hyatt Regency

### Committee Recommendations:

1. The Model Bills and Regulations Committee recommends Regulation 4(a) be revised as indicated in Attachment A and that the AAFCO Board of Directors review the proposed revision for future consideration by the Association membership.
2. The Model Bills and Regulations Committee recommends the title of Regulation 9 be revised as indicated in Attachment C and that the AAFCO Board of Directors review the proposed revision for future consideration by the Association membership.

### Board Recommendations: None

### Association Recommendations: None

### Committee Report and Minutes (January 22, 2018):

Model Bills and Regulations Committee Chairman Doug Lueders called the meeting to order at 1:30 p.m. on January 22, 2018. He welcomed committee members, industry advisers and guests who were present, and reviewed the agenda.

In addition to Chairman Lueders, committee members participating in the meeting were: Ken Bowers (Kansas), Erin Bubb (Pennsylvania), Tim Darden, (New Mexico), Mike Davidson (California), Robert Geiger (Indiana), Richard Ten Eyck (Oregon), and Scott Ziehr (Colorado).

Industry advisers participating were: Angela Mills and Steve Younker (AFIA); David Dzanis (APPA/ACVN); Emily Helmes (Enzyme Technical Association); Catherine Alinovi (Next Generation Pet Food Manufacturers Association), Jan Campbell and David Fairfield (NGFA); Angele Thompson and Pat Tovey (PFI); and Sue Hayes (Wild Bird Feeding Industry).

#### Minutes from Previous Committee Meetings

Chairman Lueders noted that minutes from the August 10, 2017 committee meeting conducted in Bellevue were previously approved, posted on the AAFCO website and Feed BIN, and were included in the 2018 Midyear Meeting's General Session packet.

#### Old Business

Mr. Ziehr, chair of the workgroup established to evaluate proposed revisions to labeling of mineral and vitamin units, as well as label unit nomenclature used throughout the Model Bills and Regulations, provided the following workgroup update.

*The working group identified all instances of vitamin and mineral units within Chapter 4 of the AAFCO Official Publication. Upon discussion among the working group of any recommendations that might be made at the 2018 Midyear meeting, a consensus was formed within the group that while a change is needed to address discrepancies in the units that are allowed for expression of vitamin and mineral guarantees, a deeper review of the chapter is needed before any changes could be submitted to the committee. The working group plans to review Chapter 4 in depth for any other changes related to the units allowed in the expression of guarantees and submit recommendations for changes at the 2018 Annual Meeting.*

Individuals serving on the workgroup in addition to Scott Ziehr (CO) are: Cathy Alinovi (NGPFMA), Jan Campbell (NGFA), Angela Mills (AFIA), Ben Jones (TX) and Angele Thompson (PFI).

#### New Business

The committee proceeded to consider new business.

#### 1. Regulation 4(a). Expression of Guarantees – Fiber Indicators

Mr. Ten Eyck moved that Regulation 4(a) be revised as indicated in Attachment A and that the AAFCO Board of Directors review the proposed revision for future consideration by the Association membership.

The motion was seconded by Mr. Geiger. The committee approved the motion by a voice vote.

**2. Regulation 4(d). Expression of Guarantees – Drugs**

The committee discussed proposed revisions to Regulation 4(d) as indicated in Attachment B. The proposed revisions were suggested in response to the elimination of growth promotion and/or feed efficiency claims by drug sponsors for medically important antimicrobial drugs used in or on animal feed.

The committee took no action on the proposed revision to allow more time for committee review and input from FDA.

**3. Regulation 9. Drug and Feed Additives**

Mr. Ten Eyck moved that the title of Regulation 9 be changed as indicated in Attachment C to more accurately describe what the regulation addresses.

The motion was seconded by Mr. Geiger. The committee approved the motion by a voice vote.

**4. Discussion on Statements for Uniform Interpretation and Policy (SUIP)**

Chairman Lueders expressed his view that if a subject is important enough to be incorporated as a SUIP (which he characterized as being comparable to an ingredient tentative definition), the subject should have a defined path to incorporation into the Model Bills or Regulations or eventually be deleted. He further expressed his view that Chapter 5 should not be the permanent home for SUIPs.

Considerable discussion followed about the value and need for SUIPs. In response, Mr. Ten Eyck moved that the committee establish a workgroup to evaluate the topic. The motion was seconded by Mr. Davidson. The committee approved the motion by a voice vote, with the following workgroup members appointed by Chairman Lueders. The workgroup members are Padma Pillai (CVM DAF), Liz Beckman (FLC), Steve Younker (AFIA), Austin Therrell (FMC), Emily Helmes (ETA), Angele Thompson (PFI) and Cathy Alinovi (NGPFMA).

**Adjournment**

Mr. Lueders asked whether there was any other business to be considered by the committee. Given that none was identified, the committee meeting was adjourned at 2:25 pm.

On behalf of the Model Bills and Regulations Committee, I respectfully submit this report and request acceptance of the report and recommendations by the AAFCO Board of Directors and the Association membership.

**Attachment A: Regulation 4. Expression of Guarantees – Fiber indicators**

(page 130 in 2018 printed OP)

- (a) The guarantees for crude protein, equivalent crude protein from non-protein nitrogen, lysine, methionine, other amino acids, crude fat, crude fiber and other fiber indicators shall be in terms of percentage.

**Attachment B: Regulation 4. Expression of Guarantees – Drugs**

(pages 130-131 in 2018 printed OP)

- (d) Guarantees for drugs shall be stated in terms of percent by weight, except:
  - (1) Antibiotics, present at less than 2,000 grams per ton (total) of commercial feed shall be stated in grams per ton of commercial feed.
  - (2) Antibiotics present at 2,000 or more grams per ton (total) of commercial feed, shall be stated in grams per pound of commercial feed.
  - (3) The term “milligrams per pound” may be used for drugs or antibiotics in those cases where a dosage is given in “milligrams” in the feeding directions.

**Attachment C: Regulation 9. Drugs and Additives in Feed**

(page 134 in 2018 printed OP)

**Pet Food Committee Report**  
2018 AAFCO Midyear Meeting  
January 23, 3:00–5:00 pm, Garden Grove, CA (Anaheim)

**Committee Recommendations**

Committee recommendation summary or list.

- (1) Pet Food Committee (PFC) moved to accept the GAPFA Maximum Vitamin A Workgroup report and recommend to the Board of Directors for their consideration and response to GAPFA.
- (2) PFC moved to accept and recommend the proposed change to PF2 and move to the Model Bill and Regulations Committee for their consideration.

**Board Recommendations:** None

**Association Recommendations:** None

**Committee Participants**

**Members Present:** Kristen Green (Chair, KY), Stan Cook (Vice-Chair, MO), Lizette Beckman (WA), James Embry (TX), George Ferguson (NC), Liz Higgins (NM), Tiffany Leschishin (MN), Jo Lynn Otero (NM), Jason Schmidt (LA), Katie Simpson (IN), Austin Therrell (SC), Kristen Hamilton (ID – call-in)

**Advisors Present:** Leah Wilkinson (AFIA), Robert King (AFIA), Dave Dzanis (APPA and ACVN), Angela Mills (NGFA), David Fairfield (NGFA), David Meeker (NRA), Angele Thompson (PFI), Pat Tovey (PFI), Bill Bookout (NASC), BC Henchen (AFTP), Cathy Alinovi (NGPFMA), Jean Hofve (PWA – call-in), Mollie Morrissette (PWA – call-in)

NOTE: FDA members were not able to attend the meeting due to the government shutdown.

**Committee Report**

**Committee Activities**

Motion to disband the Pet Food and Specialty Pet Food Labeling Workshop workgroup. Moved by Liz Higgins (NM) and seconded by Stan Cook (MO). Motion Passed.

Motion to accept the GAPFA Maximum Vitamin A Workgroup report as displayed (see Appendix I).

Moved by Liz Higgins (NM) and seconded by Austin Therrell (SC). Motion passed.

Motion to send the GAPFA Maximum Vitamin A Workgroup report to the AAFCO Board of Directors for their consideration and response to GAPFA. Moved by Austin Therrell and seconded by Jason Schmidt (LA). Motion passed.

Motion to add PF2 verbiage as displayed (see Appendix II). Moved by James Embry (TX) and seconded by Jason Schmidt. Motion passed.

Motion to establish a PF3(e) Workgroup. Moved by Stan Cook (MO) and seconded by Liz Higgins (NM). Motion passed.

Motion to establish a Human Grade Pet Food Validation Workgroup. Moved by George Ferguson (NC) and seconded by Stan Cook (MO). Motion Passed.

**Committee Minutes**

Meeting called to order at 3:05 pm PST

**Announcements**

PFC welcomed Katie Simpson from the Office of the Indiana Chemist as a new committee member. PFC also welcomed Bill Bookout with the National Animal Supplement Council, BC Henchen with Association for Truth in Pet Food, and Cathy Alinovi with Next Generation Pet Food Manufacturers Association as new advisors.

PFC announced that AAFCO's Laboratory Methods Services Committee needs additional representation from pet food industry/laboratories for work on moisture methods of analysis. Contact Sharon Webb (KY) with inquiries or to volunteer.

The proposed sugars method is working through the AOAC process and is currently open for public comment. Comments are encouraged, as this is the methodology that supports the sugars guarantee linked to carbohydrate claims on pet foods. To make a comment,

visit: [https://www.aoc.org/AOAC\\_Prod\\_Imis/AOAC\\_Member/ANews/2018\\_News/NEWS\\_011818.aspx](https://www.aoc.org/AOAC_Prod_Imis/AOAC_Member/ANews/2018_News/NEWS_011818.aspx)

### **Working Group Reports:**

#### **Pet Food & Specialty Pet Food Labeling Workshop – Kristen Green, Univ. of KY**

The second of two workshops will be held at the conclusion of this AAFCO mid-year meeting. The workshop was built upon the hard work done to update the Pet Food Regulations Label Review Checklist and the Pet and Specialty Pet Food Labeling Guide. Special thanks to Charlotte Conway, Kristen Green, members, advisors, and Jennifer Roland with FASS and other volunteers for their tremendous efforts over the last several years. This working group has completed its charge and has been disbanded. The materials for the workshop will remain in the Feed BIN under the Projects folder for future use.

#### **AAFCO Website Review – Lizette Beckman (WA)**

There are four topics to be updated on the AAFCO Talks Pet Food Website and two have been completed. These will be submitted to the full PFC for review at the Annual Meeting. Work continues on the remaining two topics.

#### **GAPFA Maximum Vitamin A Workgroup – Kristen Green (KY), standing in for Dr. Bill Burkholder and Charlotte Conway with FDA-CVM**

The workgroup's recommendation was that AAFCO should not change the vitamin A maximum in growing and reproducing dogs from 62,500 IU/1000 kcal to 100,000 IU/1000 kcal. The Global Alliance of Pet Food Associations (GAPFA) made this request to the AAFCO Board of Directors who then requested a recommendation from the PFC. The PFC voted to accept the workgroup report and send the workgroup's recommendation to the AAFCO BOD for a response to GAPFA. The workgroup report is available in Appendix I.

#### **Reviewing AAFCO Feeding Protocols Workgroup (to account for growth of large size dogs) – Kristen Green (KY), standing in for Dr. Bill Burkholder (FDA-CVM).**

The workgroup has not convened yet but has a meeting scheduled. Updates will be forthcoming.

#### **Discussion Items:**

##### **Including Calorie Content in PF2 Label Format and Labeling – Kristen Green (KY)**

It was proposed to amend PF2 to include calorie content since PF9 was amended requiring a calorie content statement on all pet food products (dog & cat) including treats, snacks, supplements and complete and balanced products. The proposed revision would be to add calorie content requirement language to regulation PF2(a) which outlines basic required pet food label elements (see Appendix II).

##### **Veterinary Oral Health Council (VOHC) Proposal – Dr. Colin Harvey (VOHC)**

The revised AAFCO Dental Claims Guidelines require firms to identify the mechanism used to achieve dental claims. The VOHC proposal was intended to present an option to AAFCO to utilize the VOHC process and seal to determine whether such claims can be substantiated. VOHC is not aware of anyone with specific dental expertise in AAFCO and proposes that AAFCO accepts the validity of dental claims for products that are on the VOHC accepted list and have been awarded the VOHC seal. PFC members voiced concerns that use of a non-governmental organization to validate claims might set precedent for other less vigorous third party organizations to propose their own validation protocols. Another concern was whether or not states would be able to legally accept third party reviews even though VOHC is generally a recognized credible organization in reviewing dental claims. Finally, there were concerns that VOHC does not review or consider whether such claims are allowable per the AAFCO Dental Guidelines based on the stated mechanism of action (i.e. enzymatic action). It is important to recognize credible organizations such as VOHC and this information needs to be disseminated. PFC does not intend to pursue this proposal at this time.

##### **Discussion of confusion regarding PF3(e)**

There has been continued confusion expressed by control officials and industry regarding PF3(e) and whether it still applies to product names. Dr. Dave Dzanis gave a historical review of PF3(e) and indicated that it has been in the AAFCO OP since the 70s or 80s. In the 90's there was a complete rework of the regulations although the working group was told not to change the intent of the regulations. The workgroup at that time was not sure of the intent of PF3(e), so they left it in the PF Regulations. It appears that PF3(e) was meant as a catch all but regulators and industry have yet to identify a situation under which it might be valid to use. When the regulations were changed in 1988, the flavor language had not been included yet. There are two parts to PF3(e) – part one has probably outlived its usefulness, however part two might still be valid. It was decided to establish a workgroup to determine if PF3(e) is still relevant or if changes should be considered. The workgroup will be chaired by James Embry (TX) and members are Liz Higgins (NM), Angele Thompson (PFI), Dave Dzanis (ACVM, APPA) and Cathy Alinovi (NGPFMA).



### **Edits to Human Grade Guidelines Language – Dave Dzanis**

Dr. Dzanis explained that it was brought to his attention that an interpretation of the human grade guidance was leading to misunderstanding of AAFCO's intent when the guidance was drafted. Use of the word 'edible' in the guidelines has sparked the question: was it the intent and expectation that the final pet food product be subject to USDA oversight and inspection? It was made clear that this was not the intent of the PFC as USDA does not have jurisdiction over pet food products and that this would create an untenable jurisdictional problem. The proposed edit to the feed term "human grade" and the Human Grade Guidelines is to remove the term "edible". Dr. Dzanis explained that in drafting the guidelines the workgroup include the term "edible" in its colloquial use versus as a legal term, so the simplest way to solve the issue is to remove the term "edible". Comments were made that USDA inspects all foods with >3% meat and if said product is moved to the pet food world that USDA will not inspect. There is a large amount of confusion and concern from consumers regarding the proposed change. Note: Dr. Dzanis was not representing ACVN or APPA in this proposal.

A separate motion was made based on both industry and consumer confusion as to who has jurisdiction over these types of products. A Human Grade Pet Food Validation workgroup was formed that will be chaired by George Ferguson. The Workgroup mission shall be: while utilizing AAFCO's terms, definitions and guidance for human grade pet food claims; identify options whereby FDA and USDA may partner together for the purpose of validating human grade pet food claims in products that span both agencies jurisdiction. The members of the workgroup include: Caitlin Price, Tiffany Leschishin, Austin Therrell, Charlotte Conway, Ryan Perdue, Mollie Morrissette and Heather Waelterman.

### **Pet Food Label Modernization Discussion – Stan Cook, MO Dept. of Agriculture**

The label modernization remains a major focus for PFC. The goal from the AAFCO annual meeting for the workgroup was to reach consensus in the four subgroups for their work products. While not all goals have been met, significant progress has been made. Sample labels have been developed that contain elements from the subgroups that have been working (see Appendix III). The four subgroups are Nutrition Facts Box (Jason Schmidt, Chair), Ingredient List (Richard Ten Eyck, Chair), Nutritional Adequacy Statement (Jo Lynn Otero, Chair) and Safety Statement (Lizette Beckman, Chair). Each subgroup chair reviewed their group's progress and explained the elements on the mock up labels as well as discussing areas of on-going work and any specific questions that the subgroups have. The floor was opened for comments. The goals for the next meeting are to get subgroup consensus and to complete the regulatory language. Additionally the draft mock up labels as well as other label elements will be included in a consumer survey.

Pet Food Committee Adjourned at 5:05 pm PST.

## Appendix I: AAFCO-GAPFA Maximum Vitamin A Workgroup Report

**Work group members:** William J. Burkholder, DVM, PhD, DACVN; Charlotte Conway, MS, PAS; David A. Dzanis, DVM, PhD, DACVN; Angele Thompson, PhD; Ryan Yamka, PhD, MS, MBA, FACN, PAS, Dipl ACAS

Meeting Date: 11/2/17

**Summary of request:** In a June 14, 2017 email to AAFCO Pet Food Committee Chair Stan Cook, Global Alliance of Pet Food Associations (GAPFA) president Diane Loiselle requested that AAFCO consider increasing the safe upper limit of dietary vitamin A in growing and reproducing dogs from 62,500 IU/1000 kcal to 100,000 IU/1000 kcal. The request is a component of GAPFA's overall interest in the development of globally aligned scientifically based nutritional standards for dogs and cats.

This working group was formed at the AAFCO Annual Meeting in August 2017, and was charged with reviewing the GAPFA proposal and providing a recommendation to the AAFCO Pet Food Committee.

**Workgroup discussion:** The GAPFA proposal cited 6 references in the scientific literature, see Appendix A.

Of these, 5 predate the review conducted by the National Research Council's Ad Hoc Committee on Dog and Cat Nutrition to support amounts of vitamin A recommended in the 2006 publication of Nutrient Requirements of Dogs and Cats (NRC) and the formation of AAFCO's Canine and Feline Nutrition Expert Subcommittees in 2007. The designs of these studies are limited by short duration and relatively small numbers of animals. The sixth publication, which GAPFA appears to consider its pivotal evidence, was published in 2012 (Morris *et al.*), and reports that 100,000 IU vitamin A/1000 kcal ME is the safe upper limit in diets designed for puppy growth based on a 1 year study in growing Labrador Retrievers and Miniature Schnauzers. This publication is attached in Appendix B.

Only this sixth publication was reviewed in detail by this workgroup because the older studies, and the NRC interpretations, were available to the 2007 AAFCO expert subcommittee for establishing the 62,500 IU/1000 kcal vitamin A maximum for growing and reproducing dogs.

The workgroup concluded that this publication does not provide compelling evidence to support increasing the AAFCO maximum for dietary vitamin A in growing and reproducing dogs from 62,500 IU/1000 kcal to 100,000 IU/1000 kcal. The AAFCO nutrient profiles are structured to address the minimum nutrient requirements, or maximums, of either dogs at adult maintenance or those animals at non-maintenance states which include puppy growth, lactation, gestation, and pre-breeding reproductive states for both dogs and bitches. This publication could potentially only address increasing a maximum for growth of puppies because other non-maintenance states were not included in the trial.

The workgroup also found that the vitamin D content of the basal diet, 1,580 IU/kg, was quite high relative to the AAFCO minimum of 500 IU/kg and over half of the AAFCO maximum of 3,000 IU/kg. Vitamin D is known to mitigate effects of vitamin A on bone development. Thus, the vitamin D content of the test diet in the 2012 Morris *et al.* publication could potentially mitigate formation of bone lesions associated with high vitamin A. Due to the complex metabolism of vitamin A, the workgroup concluded that a study designed to support an increase in the vitamin A maximum would require proper titration of vitamins A and D as well as calcium. The workgroup also questioned the usefulness of some of the selected parameters given information in the historical literature. For example, measurement of growth plates and evaluation of growth plate closure via traditional radiographs would have likely been more a more sensitive measure than bone density via dual-energy X-ray absorptiometry (DEXA).

During discussion, the workgroup noted that the current AAFCO maximum is already greater than that of the 2006 NRC publication (62,500 IU/1000 kcal ME versus 12,500 IU/1000 kcal ME, respectively). The current AAFCO maximum is the same as that established in the 1992 AAFCO Dog Food Nutrient Profiles. Despite the lower 2006 NRC safe upper limit, in the absence of new scientific data or adverse event reports, the 2007 AAFCO expert subcommittee did not find that a reduction in the maximum was warranted. However, the fact that the 2006 NRC publication established a lower maximum than that found in the AAFCO nutrient profiles provides additional support for not increasing the current maximum.

Further, the workgroup discussed that the establishment of a maximum for a given nutrient should not be interpreted by the industry as establishment of an acceptable range for addition of that nutrient to the diet. Vitamin A sources should only be added to the diet at the minimum amount necessary to achieve the intended effect. The current maximum allows for sufficient margin in formulating a diet to account for potential processing and/or storage losses of vitamin A content of food for growing and reproducing dogs.

Appendix A: GAPFA Annex II

Appendix B: Morris, P. J., Salt, C., Raila, J., Brenten, T., Kohn, B., Schweigert, F. J., & Zentek, J. (2012). Safety evaluation of vitamin A in growing dogs. *British Journal of Nutrition*, 108(10), 1800-1809.

**Workgroup recommendation:** AAFCO should not change the vitamin A maximum in growing and reproducing dogs from 62,500 IU/1000 kcal to 100,000 IU/1000 kcal.

## Appendix II: Recommendations

The PFC recommends and moves the revised PF2(a) Label Format and Labeling as displayed below to the Model Bill and Regulations Committee for their consideration. A single line (8) was added to the current regulation along with additional related formatting changes.

*The following appears on page 139 of the 2018 AAFCO OP in the Model Regulations for Pet Food and Specialty Pet Food.*

### **Regulation PF2. Label Format and Labeling**

- (a) Pet food and specialty pet food shall be labeled with the following information prescribed in this Regulation:
- (1) Product name and brand name, if any, on the principal display panel as stipulated in PF3;
  - (2) A statement specifying the species name of pet or specialty pet for which the food is intended, conspicuously designated on the principal display panel;
  - (3) Quantity statement, as defined in Section 3(s) of this Act and Regulation 3(a)(8) of the Model Regulations, by weight (pounds and ounces, and metric), liquid measure (quarts, pints and fluid ounces, and metric) or by count, on the principal display panel;
  - (4) Guaranteed analysis as stipulated in PF4;
  - (5) Ingredient statement as stipulated in PF5(a);
  - (6) A statement of nutritional adequacy or purpose if required under PF7;
  - (7) Feeding directions if required under PF8;
  - (8) A statement of calorie content if required under PF9; and
  - (9) Name and address of the manufacturer or distributor as stipulated in Regulation PF11.

## **Appendix III: Pet Food Label Modernization presentation with draft mock labels**

The presentation can be viewed online at <https://www.aafco.org/Regulatory/Committees/Pet-Food>.

## Proficiency Testing Program Committee Report

2018 AAFCO Midyear Meeting  
January 22, 1:30–5:30 pm, Garden Grove, CA (Anaheim)

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

### Committee Participants

#### Members Present

First	Last	Affiliation	Email	Role
Brenda	Snodgrass	AAFCO PTP/OK Dept. of Ag	<a href="mailto:pt@aaftco.org">pt@aaftco.org</a>	Chair – Program Manager
Louise	Ogden	AAFCO PTP	<a href="mailto:pt@aaftco.org">pt@aaftco.org</a>	Vice Chair – Quality Manager
Nancy	Thiex	AAFCO PTP	<a href="mailto:nancy.thiex@gmail.com">nancy.thiex@gmail.com</a>	Manager
Andy	Crawford	AAFCO PTP	<a href="mailto:andy@crawford.org">andy@crawford.org</a>	Statistician
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Deepika	Curole	LSU Dept. of Ag. Chem.	<a href="mailto:dcurole@ldaf.state.la.us">dcurole@ldaf.state.la.us</a>	Member
Teresa	Grant	NC Dept. of Ag & APHL Liaison	<a href="mailto:teresa.grant@ncagr.gov">teresa.grant@ncagr.gov</a>	Member
Tai	Ha	NE Dept. of Ag	<a href="mailto:tai.ha@nebraska.gov">tai.ha@nebraska.gov</a>	Member
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Aaron	Price	CFIA	<a href="mailto:aaron.price@inspection.gc.ca">aaron.price@inspection.gc.ca</a>	Member
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Sharon	Webb, Ph.D.	UK Div. of Reg. Serv.	<a href="mailto:sharon.webb@uky.edu">sharon.webb@uky.edu</a>	Member

#### Advisors Present

First	Last	Affiliation	Email	Role
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Ken L.	Riter	Nestle Purina Analytical Labs & Pet Food Institute	<a href="mailto:ken.riter@purina.nestle.com">ken.riter@purina.nestle.com</a>	Advisor
Jeff	Rich	Romer Labs	<a href="mailto:Jeff.rich@romerlabs.com">Jeff.rich@romerlabs.com</a>	Advisor
John	Szpylka	Merieux NutriSciences	<a href="mailto:John.szpylka@mxns.com">John.szpylka@mxns.com</a>	Advisor
Susan	Wiegert	Phibro Animal Health Corporation & AFIA Alternate	<a href="mailto:susan.wiegert@pahc.com">susan.wiegert@pahc.com</a>	Advisor

## Committee Report

### Sub-Committee Activities

ACTION: Updated the method code list.

### Committee Minutes

- 1) Call to Order
- 2) Review and Approval of Agenda
  - a) Approved with modifications
- 3) Introductions and Sign-up Sheet
- 4) Program Leadership and Administrative Update
  - a) Financial update
    - i) Financial Reports provided by FASS Executive Assistant, Jennifer Roland
      - i. Contact Chair for more information
    - ii) QA Manager salary/wages is now a budget line item, effective FY2018
  - b) Accreditation update
    - i) Surveillance and mycotoxin audit has been completed. Passed with flying colors. Mycotoxin program will soon be included in scope (will have a total of four schemes accredited to ISO /IEC17043)
  - c) Customer Feedback and Surveys: Shipping of samples to the participants is still the major challenge for the program. People missing or getting damaged samples must fill out the form on the website for a replacement. In case of damaged packages please provide picture(s). The form allows for uploading pictures. *Presentation: AAFCO PT Program Customer Feed Back & Surveys*
  - d) Continuity of Operations. A back-up plan covering for the major participants still has not been developed. Special concern centers around backup for Bob Kieffer and his operation (preparation and shipping of participant samples). Program leadership is currently Chair: Brenda Snodgrass, Vice-Chair: Louise Ogden, Statistician: Andy Crawford, Prep Facility: Bob and Amy Kieffer, Program Support: Nancy Thieux
- 5) Program Summary
  - a) Program Participation Report and homogeneity assessment –  
*Presentations: PTP2017Demographics, PTP2017ParticipationAnaheim2018, and PTPDataInputLessThanSign*
    - i. Feed scheme: Around 226 labs submitting results in the feed scheme. Test samples met homogeneity criteria. AAFCO has received the needed dispensations from FDA regulatory requirements to manufacture the medicated test samples.
    - ii. Pet food scheme: Around active 64 participants. Met homogeneity criteria. The AAFCO PTP Committee is asking for help in procuring ingredients for the Pet Food Scheme. Please put the appropriate person at your company in contact with Louise Ogden (pt@aafco.org). The committee is having trouble getting the relatively small amounts of ingredients needed for the program. Contacts or help with ingredient suppliers or ingredient donations from manufacturers are all appreciated.
    - iii. Mineral scheme: Around 39 active participants
    - iv. Mycotoxin scheme: Around 64 participants and growing. Homogeneity and stability testing in progress. The supplier of the test material (Trilogy) provides homogeneity and stability (2 months) studies but additional studies are needed. *Presentation: Mycotoxin2017HomoStab.*
- 6) Method code updates
  - a) An advisory group of the Committee consisting of Brenda Snodgrass, Louise Ogden, Manisha Das, John Szpylka and Sharon Webb reviewed the current method code lists. Louise Ogden presented the updates and changes. The changes were approved by the committee. The updates will be posted in early February. *Presentation: AAFCO PTP Method Code Updates*
- 7) Roundtable
  - a) The suggestion was made to include a Type B drug sample (e.g., CTC at 8,000g/ton) in the program
- 8) Adjournment

### Action Item Table

Responsible	Item	Action	Timing/Status
Louise O	Scope Update	Add new ANAB Scope of Accreditation to AAFCO website & DRW	When Issued by ANAB
Louise O. & FASS IT Support	Method Code Lists Updates	Update the AAFCO PT Program Website & the DRW	February 2018
Brenda S.	Financial Reports	Include PT Program Financial Reports for FY 2017 and FY 2018 (1 <sup>st</sup> & 2 <sup>nd</sup> quarters) in the Meeting Minutes for the 2018 Mid-year Meeting in Anaheim, CA	March 2018

### Meeting Attendees

First	Last	Affiliation	Email	Role
Josh	Arbaugh	WV Dept. of Ag	jarbauch@wvda.us	Member
Shelli	Bencomo	Ballard Manufacturing	shellib@ballardmfg.com	
Kyle	Bennett	Neogen Corp.	kbennett@neogen.com	
Ametra	Berry	GA Dept. of Ag	ametra.berry@agr.georgia.gov	
Jennifer	Braun	Phibro Animal Health Corporation	Jennifer.Braun@pahc.com	
Jane	Caldwell	Midwest Labs	jcaldwell@midwestlabs.com	
Angela	Carlson	SGS North America	angela.carlson@sgs.com	
Gina	Clapper	USP	gina.clapper@usp.org	
Andy	Crawford	AAFCO PTP	andy@crawford.org	Statistician
Deepika	Curole	LSU Dept. of Ag. Chem.	dcurole@ldaf.state.la.us	Member
Sally	Flowers	NE Dept. of Ag	sally.flowers@nebraska.gov	
Teresa	Grant	NC Dept. of Ag & APHL Liaison	teresa.grant@ncagr.gov	Member
Casey	Guccione	KS Dept. of Ag	Casey Guccione@ks.gov	
Tai	Ha	NE Dept. of Ag	tai.ha@nebraska.gov	Member
Heidi	Hickes	MT Dept. of Ag	hhickes@mt.gov	
Jeff	Horst	Agri-King	jeff.horst@agriking.com	
Alexis	Huyghues-Despointes	J. M. Smucker	alexis.huyghuesdespointes@jmsmucker.com	
Dorota	Inerowic	OISC	inerowic@purdue.edu	
MaryAnn	Khosravifard	CDFA-CAC Feed Lab	maryam.khosravifard@cdfa.ca.gov	

<b>First</b>	<b>Last</b>	<b>Affiliation</b>	<b>Email</b>	<b>Role</b>
Kent	Kitade	AAFCO Life Member	kent.kitade@gmail.com	
Mary	Koestner	MO. Dept. of Ag	mary.koestner@mda.mo.gov	Member
Mark	LaBlanc	LA Dept. of Ag	mark_l@ldaf.state.la.us	Member
David	Levin	Covance Labs	david.levin@covance.com	
Jennifer	Martin	Colo State Univ/Pet Food Alliance	jennifer.martin@colostate.edu	
Alejandra	McComb	EnviroFlight	ammccomb@enviroflight.net	
Ashley	McWhorter	Ballard Manufacturing	ashleym@ballardmfg.com	
Quintin	Muenks	MO Dept. of Ag	quintin.muenks@mda.mo.gov	
David	Nobo	KS Dept. of Ag	david.nobo@ks.gov	
Lauren	O'Mara	UK Div. of Reg. Serv.	lauren.omara@uky.edu	
Louise	Ogden	AAFCO PTP	pt@aaeco.org	Vice Chair – Quality Manager
Karen	Pietrzen	Mich Dept. of Ag	pietrzen@michigan.gov	
Lise-Anne	Prescott	CFIA	lise-anne.prescott@inspection.gc.ca	
Aaron	Price	CFIA	aaron.price@inspection.gc.ca	Member
Lars	Reimann	Eurofins & AFIA Primary	larsreimann@eurofinsus.com	Advisor
Jeff	Rich	Romer Labs	Jeff.rich@romerlabs.com	Advisor
Ken L.	Riter	Nestle Purina Analytical Labs & Pet Food Institute	ken.riter@purina.nestle.com	Advisor
Lisa	Ruiz	Eurofins	LisaRuiz@eurofinsUS.com	
Teresa	Rygiel	Fl. Dept. of Ag	Teresa.Rygiel@freshfromflorida.com	
Yvonne	Salfinger	APHL	yhale@aol.com	
Bobby	Sanchez	New Mexico Dept. of Ag	bsanchez@nmda.nmsu.edu	
Leo	Schilling	Eurofins	LeoSchilling@eurofinsus.com	
Jennifer	Seehusen	MN Dept. of Ag	jennifer.seehusen@state.mn.us	
Robert	Sheridan	NY Dept of Ag	robert.sheridan@agriculture.ny.gov	
Frank	Sikora, Ph.D.	AAPFCO (Magruder)	fsikora@uky.edu	Member



<b>First</b>	<b>Last</b>	<b>Affiliation</b>	<b>Email</b>	<b>Role</b>
Brenda	Snodgrass	AAFCO PTP/OK Dept. of Ag	pt@aafco.org	Chair – Program Manager
Jason	Swancer	Pa Dept. of Ag	jswancer@pa.gov	
Michele	Swarbrick	MN Dept. of Agriculture	michele.swarbrick@state.mn.us	Member
Kathy	Swartout	VUV Analytics	kathy.swartout@vuvanalytics.com	
Christy	Swoboda	Romer Labs	Christy.Swoboda@romerlabs.com	
John	Szpylka	Merieux NutriSciences	John.szpylka@mxns.com	Advisor
Julie	Taylor	Cargill Inc.	jtaylor@provimi-na.com	
Nancy	Thiex	AAFCO PTP	nancy.thiex@gmail.com	Manager
Victoria	Watkins	KS Dept. of Ag	victoria.watkins@ks.gov	
Sharon	Webb, Ph.D.	UK Div. of Reg. Serv.	sharon.webb@uky.edu	Member
Susan	Wiegert	Phibro Animal Health Corporation & AFIA Alternate	susan.wiegert@pahc.com	Advisor
Sara	Williams	OTSC	smw@otsc.tamu.edu	

**Presentations: Available on Committee page**

<https://www.aafco.org/Regulatory/Committees/Proficiency-Testing-Program>

*AAFCO PT Program Customer Feed Back & Surveys*

*PTP2017 Demographics*

*PTP2017 Participation Anaheim2018*

*PTPDataInputLessThanSign*

*Mycotoxin2017HomoStab*

*AAFCO PTP Method Code Updates*

**Strategic Affairs Committee Report**  
2018 AAFCO Midyear Meeting  
January 24, 10:15 am–12:00 pm, Garden Grove, CA (Anaheim)

**Committee Recommendations:**

1. Report acceptance.
2. President Elect (Committee Coordinator) needs to communicate with Committees Chairs holding eMeetings to remind them to adhere to meeting notice requirements.

**Board Recommendations:**

1. Report accepted – *add date*

**Association Actions:**

1. Report accepted – *add date*

**Full Committee Members**

**Linda Morrison, Ken Bowers (Board Liaison), Richard Ten Eyck, Andy Gray, Erin Bubb, Jamey Johnson, Doug Lueders, Shannon Jordre, Ali Kashani, Chad Linton, Mark LeBlanc, Dragan Momcilovic, Jenny Murphy, Aaron Price, Kent Kitade, Nancy Thiex, Robert Waltz, Vice Chairperson**  
**By-Laws Sub-Committee**

**Ken Bowers, Erin Bubb, Doug Lueders, Richard Ten Eyck**

**Committee Advisors**

**Dave Fairfield, Dave Dzanis, Bob Ehart, Richard Sellers, Diane Loiselle, Nancy K. Cook\***, Kristi Kafka, Ed Rod

**Bold** denotes those participating in the meeting

\*Replacing Pat Tovey

**Committee Report:**

1. Sub-Committee: By-Laws (Ken) (Attachment 1: By-Laws Sub-Committee Conference Call Report, December 4, 2017)
  - o Update
    - Policy on posting eMeeting notices forwarded by Board: revisited text in OP and felt that generic “meeting” requirements adequately allowed for eMeetings as well.  
**ACTION:** President Elect (Committee Coordinator) - Committees holding eMeetings need to be reminded to adhere to meeting notice requirements.
    - Ingredient tentative status (Attachment 1): Suggestion is to remove tentative. (intermediate step) and simply list ingredients as official. Was to be discussed at IDC but was deferred to March conference call. IDC welcome comments from Strategic Affairs.
      - PFI don't feel there is a purpose for tentative for brand new ingredients. There may be a benefit to using it when ingredients are in the process of being modified to provide a heads up. Some states don't recognize tentative.
      - APPA: Two definitions appearing simultaneously can be confusing. Most changes are to bring ingredient definition up to current practice.
      - IDC alternate suggestion: post CVM feedback before moving forward with definition in the OP. Feedback is that tentative needs to be monitored to ensure timely movement to official.
      - AFIA: Tentative allows period for old product to be used up. Posting changes in progress in the Feed BIN can be a challenge for those who don't use it. For some ingredients there is a need for the ingredient to move quickly, if not directly, to official.
    - AAFCO name (Attachment 1): in order to accommodate members who may not be from “America”, there is a suggestion that the association name be revised.
      - Suggestion is Association of Animal Food Control Officials to keep the AAFCO acronym. Conversations with international members favor a more overarching name.

- *Need to investigate cost to change name.*
- International interest in having international name. AAFCO is viewed narrowly as American.
- *Animal Food versus Animal Feed terminology may be a challenge internationally. Feed is more recognized.*
- *WBFi changed institute to industry (filed Doing Business As (DBA)) reasonably easily, depends on state AAFCO is registered in.*
- Proficiency testing program with international clients supports change (Animal Food) to reflect those outside the America term (e.g. Europe).
- LMSC also feels that most of the world transitioned to animal food a long time ago.
- Would also require review of association terminology respecting “feed” usage. *DBA/State legislation is based on the underlying authority. Association name change may not impact.*
- FDA: animal food term would cover animal feed. As well, a change from medicated feed to medicated food is under consideration. Will need communication/outreach effort to let stakeholders know if AAFCO name is changed.
- Need to check Codex terminology as they may be using animal feed. OIE refers to animal feed.

**ACTION:** Deferred to Board for direction on whether they want this to move forward. The Board met the same afternoon and supported further investigation by Richard Ten Eyck. They will develop a charge based on the italic text. Working Group participants identified if this moves this forward: Members - Richard TE (lead), Michelle Illing., Dragan M., Bob W., Kent K., and Doug L.; Industry - Richard S. (or delegate he identifies), PFI (Diane) will provide delegate, Dave F. and Dave D.

- Committee member and advisor language from By-Laws to Procedures (Attachment 1):
  - Suggestion is an editorial change to the OP so that the statement on Page 92 (first paragraph, last sentence, of Committee Meetings, Operating Procedures) also appears on page 20 in the Committee Advisors text (before the last sentence).
  - Recommend consulting with attorney as well.

**ACTION:** By-Laws: Consider more fulsome policy review regarding general conduct of all participants and who is responsible for taking action if necessary. Should also take current Ethics section in OP into consideration. Timing: August 2018 meeting.

2. Strategic Planning 2017-2020

- o To track progress the detailed activities, timelines, and responsible committee chairs can be found in the Feed BIN.
- o Committee Chairs Midyear meeting agendas included Strategic Plan assignments.
- o Key progress has been recorded in Attachment 2: Strategic Planning 2017–2020 updates from Annual 2018. Edits are in bold-italic text.

**ACTION:** The Feed BIN will be updated based on Attachment 2.

3. Vision/Mission Discussion: Kent

- o Is it inspiring? Current text doesn't appear to be relevant. It is quite dated and may have originated 98-99 timeframe.
- o Normally carried out by association leaders (i.e. Board).

**ACTION:** Recommendation to the Board to consider holding a session to review and update the vision/mission statement as appropriate, with a facilitator experienced in this area. The Board met the same afternoon and supported holding a Board session at Seminar.

Committee financial needs from the 2018-19 budget:

- o None at this time.

The Committee report will be circulated for a 2 week editorial comment period prior to finalization and submission to FASS for posting.

**MOTION:** To accept the meeting minutes/report, subject to editorial revisions: Bob; Second – Nancy; Motion carries.

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing/Status</b>
Linda/ Committee Chairs	Strategic Plan priorities 2017-20	Update Feed BIN. Committee chairs asked to update as they make progress.	Update Feed BIN per January 2018 midyear meeting reporting.
Linda/President Elect (Stan/Bob G.)	NOPA advisor	Informed Stan that NOPA needs to be contacted to find out if they want to continue to have an Advisor and if so who.	To meet OP publishing deadline.
President Elect (Committee Coordinator)	eMeetings	Committees holding eMeetings need to be reminded to adhere to meeting notice requirements.	
Board (charge) Working Group participants: Members - Richard TE (lead), Michelle Illing., Dragan M., Bob W., Kent K., and Doug L.; Industry - Richard S. (or delegate he identifies), PFI (Diane) will provide delegate, Dave F. and Dave D.	Investigate AAFCO name change (American Feed to Animal Food or Feed)	Deferred to Board for direction on whether they want this to move forward. The Board met the same afternoon and supported further investigation. The Board will develop a charge.	
By-Laws (Ken)	Participant meeting conduct	Consider more fulsome policy review regarding general conduct of all participants and who is responsible for taking action if necessary. Should also take current Ethics section in OP into consideration.	August 2018 meeting
Board	Vision/mission statement review	Recommendation to the Board to consider holding a session to review and update the vision/mission statement as appropriate, with a facilitator experienced in this area. The Board met the same afternoon and supported holding a Board session at Seminar.	Seminar 2018

## Attachment 1: By-Laws Sub-Committee Conference Call

December 4, 2017

1:00–2:45 pm

### Members Present:

Ken Bowers, Erin Bubb, Doug Lueders, Richard Ten Eyck

### Non-Committee Members Present:

Stan Cook

### Report:

- 1.) The process for using “tentative” status was reviewed. Discussed if tentative definitions are necessary. This is an archaic system to support circulation of the hard copy OP. AAFCO votes on definitions twice a year so a definition is only tentative for 6 months and can be in the OP as tentative for 18 months. See Appendix 1 for edits to Article VII to take tentative out of the by-laws. ACTION: Review tentative status and propose language for discussion (get on Strategic Affairs agenda) – Ken by 1-23-18.
- 2.) Have By-Laws Sub-Committee review the name of the association to make it appropriate for geography covered. See Appendix 2. ACTION: Start a discussion (get on Strategic Affairs agenda) for a proposed name change for AAFCO – Ken by 1-23-18.
- 3.) Have By-Laws Sub-Committee consider international affiliates. How do we address needs of the affiliates and develop language to formalize the relationship? // Review Codex interactions and Costa Rica comments to the Board at the 2017 Annual meeting. // Strategic Plan activity: Enhance collaboration, communication, and cooperation among regulatory agencies. ACTION: AAFCO to consider international affiliates – Stan to contact Kat to give an update to the board on the December 13 call. Stan to put on next Board meeting by 12-13-17.
- 4.) Language regarding removal of committee members and advisors from assignments. Committee members and advisors serve at the pleasure of the President. Any member or advisor who behaves in a manner disruptive to committee business may be subject to removal as a member or advisor of the committee (Committee Meetings-Operating Procedures, OP page 90). Seems clear. See Appendix 3. ACTION: Policy and language regarding removal of committee members and advisors – Ken to move language from by-laws to advisors page in OP by 1-23-18.
- 5.) It has also been suggested that we review our conflict of interest (COI) policy. The board members sign a statement every so many years. Do committee chairs need to sign? It was discussed that all regulators have COI policies with their employer. The only people that this may expressly apply to is our life members. COI is already pretty well covered in the OP, Page 6, Ethics. ACTION: Conflict of interest discussion – Ken to put on board agenda by 12-13-17.
- 6.) Statements for Uniform Interpretation and Policy (SUIP)// It was discussed that if a subject is important enough to be incorporated as a SUIP (comparable to a tentative definition) it should have a defined path to incorporation into the Model Bills and Regulations or be deleted and should not have a permanent home in the OP. Doug Lueders will start going through the SUIP list to see what can be moved and what would need deleted. This will be put on the MBRC for discussion in January. ACTION: SUIP discussion – Doug to put on MBRC agenda by 1-22-18
- 7.) AAFCO Philosophy Regarding Feed Regulation (OP, page 6). The current most important aspect of feed regulation is regarding the safeguard of the health of man (humans) and animals. The order of the three sections should be changed to reflect this; Safety, Consumer Protection, Orderly Commerce. Decided this was an edit and Jennifer and Richard will take care of it. ACTION: AAFCO Philosophy Regarding Feed Regulation (OP 2017, page 6 hardcopy) – Richard T and Jennifer will change this in the OP as an edit by 1-20-2018.

## **Appendix 1**

### **#1 Review the process of using “tentative” status. Below are edits to Article VII to take tentative out of the by-laws. OP 2017, page 87 hardcopy**

#### ARTICLE VII

##### Legislative Standards and Definitions

Any proposed new legislation, regulatory principles, definition, or amendment to existing legislation, regulatory principle, or definition, must be referred to the Board of Directors before being presented to the membership for action. The Board of Directors shall review all such proposals and present them together with its recommendations to the members of the Association for action. *Any new definition or change, except an editorial change, in a definition becomes final when first adopted.* Any definitions previously approved by FDA listed in 21 CFR 573 may become official status when first adopted.

## **Appendix 2**

### **#2 Start conversation about international affiliates. Have By-Laws review the name of the association to make it appropriate for geography covered.**

The suggestion is to change the name to "Association of Animal Food Control Officials" (AAFCO). The current name is perceived to mean the United States of America. Feed regulators outside of the US are surprised to find that AAFCO is open to international members. They are also surprised that we do not allow industry to be members. This is very different than how most feed associations are set up. They perceive it as a positive to just have regulators as members. They are very interested how AAFCO can persist without industry money.

FSMA has made regulatory issues Global. The FDA Food Safety Modernization Act has brought AAFCO onto the world stage. Importers are looking at AAFCO common ingredient names and our definitions and trying to figure out what AAFCO language aligns with PCAF requirements. Several countries require an ingredient to be listed in the OP prior to importing.

A conversation platform for international consistency is needed. A need for consistent application of the rules is universal. Governments strive to build a level playing field for their industries. Industry strives for a level playing field of regulations and enforcement. There are always evolving issues and gray areas to explore. AAFCO can be key in providing that conversational platform globally just as we do in North America. AAFCO needs to embrace this role and provide a forum for global consistency in feed regulation implementation and enforcement.

The supply chain is global not local. All the ingredients in a ration largely do not come from one country. Even sourcing a single ingredient often touches a foreign supplier. Our regulations and laboratory consistency need to be as global as the feeds we are regulating.

## **Appendix 3**

### **#4 Language regarding removal of committee members and advisors from assignments.**

Proposed moving By-Laws language below to Committee Advisors section. 2017 OP, Page 21 hardcopy. This could possibly be an edit.

AAFCO is committed to providing a forum for respectful, professional discussion. All discussions should be professional and relevant to committee business. Any member or advisor who behaves in a manner disruptive to committee business may be subject to removal as a member or advisor of the committee.

## Attachment 2: Strategic Planning 2017–2020

<b>Updated Goals 2017-2020</b>	
<b>Strengthen organizational infrastructure</b>	
1	Manage and pursue revenue generating opportunities to maintain a sound financial base
<b>2***</b>	<b>Pursue hiring executive support</b>
3	Evaluate the effectiveness of the organization of AAFCO for continuous improvement
4	Provide leadership skills enhancement to develop and support AAFCO leaders
5	Optimize resource sharing opportunities
6	Enhance internal communication efficiencies and documentation within the association
<b>Promote and enhance membership participation (internal)</b>	
<b>7**</b>	<b>Identify opportunities to increase member agency participation</b>
<b>8*</b>	<b>Develop and provide professional development and technical training opportunities in support of feed programs</b>
<b>9*</b>	<b>Enhance collaboration, communication and cooperation among regulatory agencies</b>
10	Communicate and document AAFCO benefits and accomplishments
<b>Emphasize feed and food safety</b>	
11	Continue developing member feed safety programs in alignment with FSMA and IFSS
<b>12*</b>	<b>Promote and support laboratory technology, methods, quality systems and collaboration</b>
<b>Vitalize partnerships with external stakeholders</b>	
13	Identify key stakeholders and working partners and common goals
14	Develop and maintain professional relationships with stakeholders and affiliated organizations
<b>Strengthen international presence</b>	
15	Participate in relevant international meetings as resources permit
16	Invite International attendees to association activities
17	Provide a forum for international discussions on feed safety

\*Top 3 priority goals

\*\*Priority goal 4 for consideration if adequate progress is made on the top 3

\*\*\*Board priority to action

### Top 3 Priority Goals (FSMA TF activities integrated)

Updated text: italics/bold

#### Group 1: Mark Leblanc, Nancy Thiex, Ken Bowers, Meagan Davis, Dave Dressler

Outcome	Activity	Resources Needed	Timeline	Responsibility
<b>Strategy: Emphasize feed and food safety</b>				
<b>Goal 1: Promote and support laboratory technology, methods, quality systems and collaboration</b>				
1.1 ** Fund AOAC method development and validation	Review list, remove those that aren't relevant and prioritize the remainders. Identify resources to clear out analytical method needs backlog. Use existing strategy to identify method needs and prioritize them to continuously identify new needs (includes sample preparation)	Funds People	Methods needs survey completed (vitamins top). General priority list established. <b><i>Vitamin and mineral workgroup in progress. FDA hazard list published January 22, 2018. Requires review of the methods list together with the hazard list and reprioritized. Anticipate draft for August 2018.</i></b> Need to identify resources to address backlog thereafter. 3-5 years to address backlog.	LMSC
Combined with 1.3 (below)	<del>Identify resources to perform additional (field) sample collection studies</del>	Funds Equipment People	<del>6 months to identify resources 1 year to develop adequate protocols 3 years to perform additional sample collection studies</del>	1. ISG 2. LMSC
1.2 *** FSMA TF Item 3: priority setting and method development for contaminants/hazards	Determine the contaminants, hazards, matrix and action levels to provide guidance to LMSC to inform method development. Integrate collaboratively into current LMSC priorities	Subject matter experts Funds Equipment	Alliance decided not to develop specific hazard guidance information. <b><i>FDA has assumed the activity; work product published January 23, 2018.</i></b> Next step is to complete method needs statement for LMSC. Up to 3 years for subsequent method development and validation (dependent on whether there is existing method). <b><i>Bob Waltz is lead and will begin work (including LMSC representation). Plans organizational call within 30 days that will be reported, (including timelines) to FFIMC.</i></b>	FFIMC lead, EIC, ISC, IDC and LMSC



Outcome	Activity	Resources Needed	Timeline	Responsibility
1.3 ** Validation of sampling methods	a) Perform field sampling method validation including sampling equipment and sample type. b) Establish sampling methods needs statement (complete). Identify resources and develop adequate protocols to perform additional (field) sample collection studies.	Funds Equipment People Time	a) No progress field sampling – activities: needs statement, RFP, contract, evaluation. Expect it will take 2 years. b) 6 months to establish sampling method needs statement. 6 months to identify resources 1 year to develop adequate protocols. 5 years to perform sampling method validation. Will flow from 1.1 <b>Laboratory sampling guideline is expected to be complete by February 2018.</b> <b>Work group established (ISC and LMSC reps) to develop RFP by Annual August 2018. Likely nutrients (?) and bag sampling to start.</b>	ISC with LMSC support
1.4 ** Collaboration between feed programs and laboratories that perform feed sample analysis and laboratory participation in AAFCO	Encourage participation and attendance by state labs by programs and encourage communication between labs/programs. Reach out to states to encourage laboratory participation (letter/email) in AAFCO.	Time People	<b>November 2017: Letter from President (Ken) to state Directors/Commissioners.</b> August 2017 Establishing working group in LMSC for outreach to states and federal laboratories that are not attending to work on increasing participation (especially AFRPS). LMSC will develop initiatives to increase collaboration.	AAFCO Board (President) LMSC EIC

**Group 2: Kristen\* Green, Doug Lueders, Richard\* Ten Eyck, Abe Brown, Stan Cook, Kelsey\* Luebbe, Dave\* Edwards, Erin\* Bubb**

Outcome	Activity	Resources Needed	Timeline	Responsibility
<b>Strategy: Promote and enhance membership participation (internal)</b>				
<b>Goal 2: Enhance collaboration, communication and cooperation among regulatory agencies</b>				
2.1 ** Share compliance letters/enforcement actions. Coordination of enforcement action. <i>Hold: pending identification of additional EIC members to help.</i>	Categorize Listserv topics to Feed BIN	Administrative support Feed BIN	<b><i>Archive Listserv is searchable. Categorization of active Listserv is being done as part of next item (Sharing compliance letters and enforcement actions). North Carolina also has a "mini" Listserv. It is informal, but has national data. Membership for regulators is vetted in order to control access.</i></b>	EIC to designate lead with FASS support - Jennifer
	Share compliance letters and enforcement actions	Guidance from subject matter experts	<b><i>Call couple weeks ago. Plan: Need Searchable and secure IT solution; can be done fairly easily and quickly according to Food Shield IT expert. Confidential company info release could be an issue for states. Follow up with Food Shield and have scope of work for Board (including FASS support needs to upload if necessary), end of March 2018 (before Seminar).</i></b>	EIC to designate lead with FASS support
	Share Division of Animal Feed letters		<b><i>Is now component of item above (Sharing compliance letters and enforcement actions).</i></b>	EIC to designate lead and coordinate with FDA as necessary; FASS to support
	Enforcement Issues Committee can pick up topics – coordinate and enhance committee action		<b><i>No action due to lack of members willing to lead</i></b>	EIC to designate lead with FASS support – Members
	Consider development of core report (similar to that of FDA) (frequency to be determined)	Listserv EIC IDC Any committee	<b><i>No action; still seeking lead.</i></b>	EIC to designate lead with FASS support

Outcome	Activity	Resources Needed	Timeline	Responsibility
2.2 *** FSMA TF part of Item 3: Enforcement strategy for contaminants/ hazards.	Determine the contaminants, hazards, matrix, action levels and enforcement strategy to provide guidance to LMSC to inform method development and priority setting.		Alliance decided not to develop specific hazard guidance information. <b>FDA has assumed the activity; work product published January 23, 2018. Combined with activity 1.2 in FFIMC WG.</b>	FFIMC lead, EIC, ISC, IDC and LMSC
2.3 ** Enhanced use of Feed BIN	Identify activities to enhance use	Financial support	<b>COMPLETE</b> January 2017 (activities detailed in Feed BIN)	CIOC
2.4 ** Coordinate with NASDA to develop a framework for state feed programs to deliver FSMA implementation	Provide data and information for NASDA grant application (AAFCO is sub-contractor) and subject matter experts to support framework development.	AAFCO subject matter experts	<b>COMPLETE</b> Grant application successful and SME identified. Framework development will be tracked via grant reporting obligations. <b>Is the framework document enough or is additional work required of AAFCO (see grant obligations)? Board discussion item.</b>	NASDA-AAFCO-FDA FSMA Steering Committee (AAFCO reps: Linda, Ali, Bob W., Richard)
2.5 *** FSMA TF Item 1- align Model Bill with needed authorities to Implement FSMA	Make recommendations to align the Model Bill with needed authorities to implement FSMA		Language finalized. <b>COMPLETE January 2017</b>	MBRC
2.6 *** FSMA TF Item 2 - transition AAFCO GMPs to FSMA GMPs and convert AAFCO Model Feed Safety Program Plan to AFRPS	a. Develop a plan for states that have adopted AAFCO's model GMPs to transition to FSMA GMPs. b. Remove Model Feed Safety Plan from OP (archive for historical reference) and use AFRPS instead		<b>COMPLETE August 2016</b>	a. FFIMC with MBRC and PFC b. FFIMC with OP section editor and Feed Safety Coordinator
2.7 *** FSMA TF Item 6 – develop communication plan for AAFCO specific FSMA implementation activities	a. Develop an AAFCO Communication Plan to better inform b. Develop a model communication plan for states to use for outreach to regulated parties		Framework development (activities detailed in Feed BIN); content development will be ongoing thereafter <b>Draft developed February 2017. Working with Richard TE and FDA. Seeking comments from committee but none received so far. Expect 6 months to finalize for presentation August 2018 and execution by 2019.</b>	CIOC 2017 initiated biannual newsletter.

**Group 3: Dan Danielson, Ali Kashani, Tim Weigner**

Outcome	Activity	Resources Needed	Timeline	Responsibility
<b>Strategy: Promote and enhance membership participation (internal)</b> <b>Goal 3: Develop and provide professional development and technical training opportunities in support of feed programs</b>				
3.1 ** AFRPS – draft curriculum for examples. Available training needs to meet standards	Extract all resource (training) needed to meet Standard 2  Crosswalk to IFPTI; AITS/BITS; ORAU; CVM, FEMA  Identify gaps and approach land grant universities	Subject matter experts. Potential travel for non-Co-Ag contract states	Work group formed. <b>Covers 3.1 and 3.2. Document finalized and will be voted on electronically soon (ETC lacked quorum January 2018). Need mechanism to keep updated, likely via George’s group. Developed training calendar in Feed BIN and events need to be loaded.</b>	ETC together with ISC
3.2 ** Directory/ listing of trainings available	Once training needs and model training plan are done (above), catalogue courses and categorize as basic and advanced	FASS support	Work group formed. See 3.1 <b>Complete: cataloguing and categorizing (per vote 3.1 above). Basic/Advanced terminology means different things for AAFCO(BITS/AITS), IFPTI and potentially individual states. Decided that categorization would also contain disclaimer allowing state discretion in courses they require for their inspectors.</b>	ETC
3.3 ** Model training framework	Develop model document for joint inspection (OJT – on the job training) for feed. <del>Develop model training plan.</del> Not “developing model training plan” per follow-up conversation with Tim W., Dan D. and Ali K.	Subject matter experts. Potential travel for non-Co-Ag contract states	Work group formed. <b>Drafted (3 part: policy overview, training plan (modified yearly for employee) and forms). ISC supplied material to ETC who drafted document. Draft is with ISC for comment (not edit). Have consulted with ISC but not active part of ETC work group. Jim True will interface as he is on both committees. ETC will revise based on ISC comments. Anticipate final August 2018.</b>	ETC (George F. lead) and ISC

<b>Outcome</b>	<b>Activity</b>	<b>Resources Needed</b>	<b>Timeline</b>	<b>Responsibility</b>
3.4 *** FSMA TF Item 4 - develop training material not covered through Alliance work product	Verify if training material for feed ingredient manufacturing from the (FSPCA) Alliance meets the needs of inspectors and revise as needed and include in directory of training material	Subject matter experts. Potential travel for non-Co-Ag contract states	<b><i>Evaluated the GMP inspection of feed manufacturers against feed ingredient manufacturers and feel the general manufacturing training is adequate for both. Next step will be assessment respecting hazard analysis by August 2018.</i></b>	FFIMC & ISC supported by ETC
3.5 *** FSMA TF Item 5 – review and revise the Feed Inspector's Manual to support FSMA implementation	Review and revise the Feed Inspector's Manual to make sure it supports FSMA implementation	Subject matter experts. Potential travel for non-Co-Ag contract states. FASS support for publication, including printing/ Feed BIN costs.	<b><i>FDA has completed the initial review. Committee commented back and expect to finalize with FDA by August 2018.</i></b>	ISC supported by LMSC and ETC

\*\*Top 3 outcomes identified at May 2 planning session

\*\*\*FSMA TF outcomes integrated into 2017-2020 Strategic Plan

**Participants:**

<b>Name</b>	<b>Priority Voting Pre-meeting</b>	<b>Attended May 2</b>	<b>AAFCO Role</b>
Mark LeBlanc	X	X	Board
Ken Bowers	X	X	Board/Chair Subc.
Richard Ten Eyck		X	Board/Chair
Ali Kashani	X	X	Board/Chair
Dan Danielson	X	X	Board/Co-Chair
Stan Cook	X	X	Board/Chair
Erin Bubb	X	X	Board
Robert Geiger			Board
Kristen Green	X	X	Board
Eric Nelson			FDA advisor
Dave Edwards		X	FDA advisor
Abe Brown		X	FDA advisor
Tim Weigner		X	FDA advisor
Tim Lyons			Chair
Meagan Davis	X	X	Chair
Dave Dressler		X	Co-Chair
Chad Linton			Co-Chair
Nancy Thiex	X	X	Co-Chair
Aaron Price	X		Co-Chair
Doug Lueders	X	X	Chair
Linda Morrison	X	X	Chair
Bob Waltz	X		Feed Safety Coord.
Kelsey Luebbe		X	Co-Chair