

Model Bills and Regulations Committee Report

2018 AAFCO Midyear Meeting

January 22, 2018 – Anaheim, California

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:

Association Actions:

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 p.m.

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.

**Model Bills and Regulations Committee
Attachments from Jan. 22, 2018 Meeting**

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*)