Welcome!

Welcome to the AAFCO Newsletter, your source for information about upcoming events, new members, retirements, meetings, and AAFCO-sponsored events. The AAFCO newsletter is published twice a year before the midyear and annual meetings.

Remember, this is YOUR newsletter. We only know what’s going on if you tell us. Please send information or pictures you would like to see in the next newsletter.

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Letter from AAFCO’s Board

The AAFCO Board of Directors (BOD) would like to welcome you to the third newsletter. Earlier this year, a workgroup determined that AAFCO should have an executive director to address the association’s activities and provide guidance and management in support of AAFCO’s goals. The workgroup is making progress on the review process. We hope to have an executive director for AAFCO by early next year.

The FDA-NASDA Animal Food Cooperative Agreement was developed to coordinate a national implementation framework for the Food Safety Modernization Act (FSMA) Preventive Controls for Animal Food Rule. NASDA, FDA, and AAFCO representatives participated in a face-to-face meeting in Bellevue, Washington, August 10–11, 2017, prior to the AAFCO Annual Meeting. Chapter reviews were reviewed by the group. Monthly conference calls are ongoing, and two additional face-to-face meetings have been scheduled to further the framework development. The goal is to have the framework completed by December 2017.

The Pet Food Label Modernization workgroup formed last year to review and modernize the required pet food labeling information and format. It has been decided that contracting with a project manager would speed up the process. The AAFCO Board of Directors sent out a notice seeking a project manager to help manage the Pet Food Labeling Modernization project. This is intended to be a contract position that would require some hours during the workday but is not intended to be a full-time position.

Due to the success of the Pet Food and Specialty Pet Food Labeling Workshop held in August after the AAFCO Annual Meeting in Bellevue, the AAFCO Pet Food Committee will host another Pet Food and Specialty Pet Food Labeling workshop January 24 and 25, 2018, in Garden Grove, California, immediately following the AAFCO midyear meeting. This workshop covers the basics of pet and
specialty pet food labeling as well as more complex issues such as product claims. This workshop is limited to 100 participants and is filling fast. Registration information is available on the AAFCO website: [read more…].

A new Memorandum of Understanding has been signed between FDA and AAFCO to support the feed ingredient definition process [read more…].

As always, we encourage AAFCO members to get involved in the organization. We thank the membership and advisors for their hard work for the Association.

It is that time of year again when friends and family plan for the upcoming holiday season with their loved ones. As we reflect on these wonderful holidays, let it be a time for remembering, a time to share the goodness of your heart with others, and a time to enjoy family and friends. We wish you a blessed holiday season and hope it brings you comfort, joy, peace, and happiness to last throughout the coming year!
Get to Know Your AAFCO Board Members

2017 Board Members (left to right): Dave Phillips–ND (Junior Director), Kristen Green–KY (Junior Director), Stan Cook–MO (President-Elect), Mark LeBlanc–LA (Immediate Past President), Bob Geiger–IN (Senior Director), Ken Bowers–KS (President), Bob Church–MT (Junior Director), Erin Bubb–PA (Junior Director), and Ali Kashani–WA (Secretary-Treasurer).

2018 Board Members: Stan Cook–MO (President), Bob Geiger–IN (President-Elect); Ali Kashani–WA (Secretary-Treasurer) Kristen Green–KY (Senior Director), Erin Bubb–PA (Senior Director), Bob Church–MT (Junior Director), Dave Phillips–ND (Junior Director), George Ferguson–SC (Junior Director), Ken Bowers–KS (Immediate Past President).

Kristen Green, AAFCO Board Member and Chair of Pet Food Committee

Kristen Green currently serves AAFCO as a Senior Board Director and as Chair of the Pet Food Committee. She has worked with the University of Kentucky as a Registration Specialist for the Division of Regulatory Services since 2012. In her role as a regulator, she is primarily responsible for reviewing and registering all livestock and pet foods sold in Kentucky.

Kristen lives with her husband and two young children in Lexington, Kentucky. She received her B.A. and M.A. from the University of Kentucky. Prior to her position with the Division of Regulatory Services, she worked for 5 years managing international animal feed registrations for Alltech Inc.
Upcoming AAFCO Events and Trainings

**AAFCO Midyear Meeting**  
**January 22–24, 2018**  
**Garden Grove (Anaheim), CA**

The AAFCO midyear meeting will be held in Garden Grove, California, January 22–24, 2018, at the Hyatt Regency Orange County. The meeting will be informative and another Pet Food and Specialty Pet Food Labeling Workshop will be held immediately after the AAFCO meeting.

Located in the heart of Southern California is Garden Grove, Anaheim, and Orange County. This unique region has a vibrant yet laid-back vibe, a creative spirit and a diverse range of activities that make it one of the nation’s most popular destinations. Orange County (OC) is well known for its world-famous theme parks, distinguished shopping centers, and trendy beach towns.

Garden Grove is minutes away from Anaheim. Some of the best things to do in Garden Grove include visiting Historic Main Street, Crystal Cathedral, and the Southern California Indian Center. Garden Grove is just a few minutes’ drive from an incredible 42-mile coastline with some of the best beaches in California: posh Newport Beach, picturesque Laguna Beach, and surfing mecca Huntington Beach (also known as Surf City USA®). Ideal, year-round weather also makes the OC the perfect spot for outdoor sports and activities, including kayaking, biking, surfing, rollerblading, stand-up paddling, hiking, and golfing.

Orange County is filled with myriad activities, including Disneyland® Park, and Knotts™ Berry Farm® Theme Park, distinguished shopping districts, dynamic meeting venues, championship golf courses, professional sports teams, and trendy beach towns.

Bordering the Pacific Ocean and situated between Los Angeles and San Diego, the OC is the perfect destination to base an all-encompassing “So Cal” experience.

Orange County is accessible by four major airports (approximate distances/times are from Anaheim):

- Los Angeles International Airport (LAX) – 35 miles/56 km, 50 minutes
- John Wayne/Orange County Airport (SNA) – 13 miles/21 km, 25 minutes
- Ontario International Airport (ONT) – 36 miles/58 km, 45 minutes
- Long Beach Airport (LGB) – 18 miles/29 km, 30 minutes.
AAFCO Pet Food and Specialty Pet Food Labeling Workshop
January 24–25, 2018
Garden Grove, CA

Due to high demand, the AAFCO Pet Food and Specialty Pet Food Labeling Workshop will be held again in conjunction with the 2018 AAFCO midyear meeting. The Workshop will be held from 1:00 pm January 24 to 5:00 pm January 25, 2018 (1.5 days) immediately following the AAFCO annual meeting at the Hyatt Regency Orange County. The workshop is designed to enable control officials, individuals from the pet food and specialty pet food industry, and others to better understand and interpret the AAFCO Model Regulations for Pet Food and Specialty Pet Food. This 1.5-day workshop covers both the basics of pet and specialty pet food labeling as well as more complex issues such as product claims. A good understanding of the AAFCO Model Regulations is essential to any firm wishing to market pet foods and specialty pet foods, treats, and supplements in the United States. For more information on the workshop, visit http://www.aafco.org/Meetings/Midyear/2018.

NOTE: The workshop is limited to 100 participants and is filling fast.

AAFCO Feed Labeling (non-pet food) Workshop
July 28–29, 2018
Ft. Lauderdale, FL

The Feed Labeling Workshop will be held July 28–29, 2018, just prior to the AAFCO Annual Meeting in Ft. Lauderdale, Florida. The agenda is still being developed; however, the feedback from the surveys conducted at the 2017 AAFCO Annual Meeting in Bellevue, Washington, has been instrumental in the development of agenda topics.

The Feed Labeling Committee plans to have both industry and regulatory presenters, to bring together a wide range of expertise in feed labeling that can offer guidance to the group. Topics tentatively on the agenda include common labeling questions, the basics of labeling, drug claims, dosage form animal health products, and labeling tips for direct-fed microbials, enzymes, and flavors. A more detailed agenda will be announced during the 2018 AAFCO Midyear meeting in Garden Grove, California, and the AAFCO website will be updated as more information is available.

AAFCO Annual Meeting
July 30–August 1, 2018
Fort Lauderdale, FL

The 2018 AAFCO Annual Meeting will be held July 30 to August 1, 2018 in Fort Lauderdale, Florida. Stay tuned to the AAFCO website as it will be updated as more information is available (http://www.aafco.org/Meetings).

Advanced Inspector Training (AITS)
Spring/Summer 2018
Location: To be determined

Stay tuned to the AAFCO website as it will be updated as more information is available (http://www.aafco.org/Meetings).
2018 NASDA Winter Policy Conference  
January 30–February 2, 2018  
Washington, DC

The 2018 NASDA Winter Conference will be held in Washington, DC from January 30–February 2, 2018, at the Grand Hyatt Washington. For more information, go to http://www.nasda.org.

Events and Trainings

AAFCO Basic Inspector Training Seminar (BITS)  
October 24–26, 2017  
Boise, ID

The 2017 Basic Inspector Training Seminar (BITS) was hosted by the Idaho State Department of Agriculture (ISDA) in Boise from October 24–26, 2017. BITS is a joint training hosted by the Association of American Feed Control Officials (AAFCO), the Association of Plant Food Control Officials (AAPFCO) and the Association of American Seed Control Officials (AASCO). There were 22 states represented, totaling 59 registered attendees and 7 training cadre members.

The agenda included presentations on various topics such as; Good Manufacturing Practices (GMPs) for animal feed manufacturing facilities, Best Management Practices (BMPs) for fertilizer facilities, an overview of feed, seed and fertilizer labels, basic animal nutrition and animal science. In addition to regulatory topics, the Boise Police Department provided an excellent presentation entitled “The Intelligence Process”. The ISDA Deputy Attorney discussed the requirements of a court testimony during the presentation “What happens when you are summoned to testify?”. Additionally, Carolyn Langley and Nathan Price from ISDA spoke on Feed Microscopy and Feed, Fertilizer and Amendment Review, respectively.

Wednesday was a day out in the field for the attendees to learn hands-on sampling techniques. Dynamite Feed Mill in Meridian, ID, graciously allowed us to discuss sampling of large packaged
products, blocks, bulk bags, bulk load out and also provided the attendees with a tour and history of the feed mill. Bayer Crop Science in Parma, ID set up multiple stations for attendees to learn a variety of seed sampling techniques, such as sampling large and small packaged products. Valley Agronomics LLC in Greenleaf, ID provided stations for discussions of a variety of fertilizer sampling techniques, including large packaged fertilizers, bulk ingredients, bulk load-out, and liquid fertilizers.

The attendees and training cadre wish to express their thanks to Andrea Thompson and Julia Chavez-Reynoso with the Idaho State Department of Agriculture for working diligently to host a very informative and enjoyable meeting.

**Upcoming Trainings for implementation of Title 21 CFR Part 507 Current Good Manufacturing Practice, Hazard Analysis, & Risk-Based Preventive Controls for Food for Animals:**

**Current Good Manufacturing Practices (cGMP) Animal Food Regulators Course Prerequisites:**

- Complete VM101W100 in Pathlore – “Grain and Feed Mill Operations” – online course that takes about 10 hours; may have completed a face to face training for this course offered over the past 3 years (VM101).
- Complete VM8000W in Pathlore – “Regulatory Foundations of Current Good Manufacturing Practices (CGMPs) for Food” – online course that takes approximately 4 hours.

**Preventive Controls Animal Food Regulators Course Prerequisites:**

- Complete the Food Safety Preventive Controls Alliance (FSPCA) Preventive Controls for Animal Food course—face-to-face course offering requiring registration offered through this website: [https://www.ifsh.iit.edu/fspca/fspca-preventive-controls-animal-food](https://www.ifsh.iit.edu/fspca/fspca-preventive-controls-animal-food).
- Complete the VM9000W in Pathlore—“Preventive Controls (PC)”, online course that takes approximately 4 hours.


**FDA Current Good Manufacturing Practices (cGMP) Trainings for Animal Food Regulators**

FDA will announce these classes individually as they near the class delivery dates.

**FY18 Course Schedule:**

- October 24–26, 2017, in Atlanta, GA (posted 8/4/17)
- February 6–8, 2018, in Houston, TX
- April 24–26, 2018, in Denver, CO
- June 26–28, 2018, in Oakland, CA
- August 14–16, 2018, in Minneapolis, MN
- September 11–13, 2018, in Philadelphia, PA
Animal Feed Regulatory Program Standards (AFRPS) Updates

2018 FDA Animal Feed Regulatory Program Standards (AFRPS) face-to-face meeting
March 20–22, 2018
Location: To be Determined

SAVE THE DATES!!! STAY TUNED FOR MORE DETAILS!!!

Planning is underway for the 2018 AFRPS face-to-face meeting tentatively scheduled for mid-March (March 20–22, 2018).

The FDA’s Office of Partnerships is working with AAFCO to secure and confirm meeting arrangements.

State partners will be involved in planning the agenda and during the meeting, participating in interactive programs designed to provide great take home value.

Thanks to those who have agreed to serve on the Planning Committee led by Jennifer Godwin.

Animal Feed Regulatory Program Standards (AFRPS) Cooperative Agreement (CA)

Important Dates to Remember

- Mid-Year Progress Report due date **February 28, 2018**. Submit via email to Grants Management Specialist, Dan Lukash, and Project Officer, Teresa Bills.
- Research Performance Progress Report (RPPR) due date **July 1, 2018**. Submit via eRA Commons.

AFRPS Standard Project Tracking Through the Feed BIN—Washington State Department of Agriculture

The Washington State Department of Agriculture (WSDA) began tracking AFRPS in the Feed Basic Information Network (BIN) ‘Project’ site in early 2016. This was converted from tracking in an Excel spreadsheet or Microsoft Project due to the flexibility with the Feed BIN Project app. For example, in Microsoft Project you can create your milestones and tasks with start and end dates and percentage of your progress, but it does not offer the ability to upload a document pertaining to a specific task or creating a ‘Quickdoc’ to keep track of different versions of a document until finalized.

Other capabilities include after creating your milestones, for example, “Standard 1”, and creating the different tasks that need to be completed to meet the requirement; example “Create a program SOP/Policy that includes the time frames and procedures…” after you begin this task and record the ‘status’ of completion there is a tab named ‘Schedule’ that provides a Gant chart view of your overall tasks and color codes them according to your progress. This can also be exported into Excel in case you need to create other types of charts.

Additionally, this site was used to house all the records for our FDA audit so they were easily accessible during the audit. The Excel workbook that houses the ‘Self Assessment’, Assessment Improvement Plan etc.’ was not uploaded, as any document (Excel, Word) uploaded into the Project site turns it into a pdf viewable document and makes it difficult to view the content of a specific cell. Overall, using ‘Project’ in this manner made the audit efficient and little time was lost trying to find documents.

Although, there is much more work to do before we are fully implemented, the Feed BIN Project app will help to keep us on track and organized.

If your state would like to highlight an AFRPS standard you are working on for the next newsletter, please contact Liz Higgins.
AAFCO Committee Updates

Do not forget that conference agendas for upcoming meetings can be found at 2018 Annual Meeting. Reports for past meetings for the Board of Directors and all committees can all be found on the AAFCO website at Board Meetings and Committee Meetings.

Current Issues and Outreach Committee (CIOC)—Ali Kashani, Chair

Are you new to AAFCO, interested in becoming more involved, or just looking for a good networking opportunity? Come dip your toe in the pond and join us for the AAFCO 101 Welcome Reception on the evening of Sunday, January 21, 2018, from 6:00 pm to 7:00 pm in Salon VII-VIII, North Tower 2nd Floor of the Hyatt Regency Orange County. The AAFCO First-Timers Reception, traditionally held the evening before midyear and annual meetings, has been reworked. We will provide a casual setting for folks to hear about the basic mechanics of the association, as well as meet our board members, committee chairs, and industry advisors. Remember to sign up for AAFCO 101 on your 2018 midyear meeting registration. Contact Liz Higgins at lhiggins@nmda.nmsu.edu for more information. A reminder email with information about the reception will be sent to everyone who signs up for AAFCO 101.
Ingredient Definitions Committee—Richard Ten Eyck, Chair

Minutes from e-meeting on October 13, 2017, can be found at this link [read more...].

Memorandum of Understanding between the United States Food and Drug Administration and the Association of American Feed Control Officials

Background

The United States Food and Drug Administration (FDA) is the primary federal agency responsible for enforcing the Federal Food, Drug, and Cosmetic Act (the Act). Included within the FDA’s responsibilities under the Act is the responsibility for regulation of animal foods/feeds. The Act provides the authority for FDA to regulate essentially all ingredients and additives used in animal feed.1 Depending on its intended purpose or use, an ingredient or additive could be classified as a food additive, a generally recognized as safe substance, a new animal drug, or a color additive.

The Association of American Feed Control Officials (AAFCO) is a voluntary membership organization of the states in the United States (US) and Federal government agencies, as well as government agencies from other countries, responsible for the execution of laws and regulations pertaining to the production, labeling, distribution, use, or sale of animal feed and feed ingredients. The purpose of AAFCO is to provide a mechanism for developing and implementing uniform and equitable laws, regulations, standards, definitions, and enforcement policies for the manufacturing, labeling, and sale of animal feeds and ingredients. AAFCO provides “model laws” and regulations that nearly all states have adopted as the basis for their feed-control program. AAFCO membership consists of all 50 states, Puerto Rico, Costa Rica, Canada, the FDA, US Department of Agriculture, and several universities. It is governed by officers and a board of directors (known collectively as the Board) elected by the membership at the annual meeting of AAFCO. The FDA is a member of AAFCO and serves in a non-voting advisory role on the AAFCO Board.

AAFCO provides a process (herein called the AAFCO Ingredient Definition Request Process) to identify the safety, utility, and identity of ingredients used in animal feed. This process helps to ensure ingredients used in animal feed are suitable for that use and also establishes a common or usual name for the ingredients. This common or usual identity is required on feed labels by both federal law and state regulations. The AAFCO Ingredient Definition Request Process is operated by AAFCO, with the FDA providing scientific and technical assistance. The result of this collaboration has been the establishment of an effective program of benefit to feed regulatory officials, the industry, and the public.

Purpose

The purpose of this memorandum is to facilitate the FDA’s collaboration with AAFCO in the AAFCO Ingredient Definition Request Process by clarifying the responsibilities of the FDA and AAFCO during the feed ingredient definition request process and providing mechanisms for resolving disputes that arise and for modifying the definitions when required.

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1 Some articles added to animal feed fall under the purview of other federal agencies. Feed-through pesticides are regulated by the Environmental Protection Agency (EPA), and vaccines added to animal feed are the responsibility of the US Department of Agriculture (USDA).
Agreement

The FDA and AAFCO agree to the following:

A. AAFCO maintains definitions of various feed ingredients, which includes the common ingredient name, description, and any appropriate limitations for its use, and publishes the currently accepted feed ingredient definitions in the AAFCO Official Publication (OP).

B. Requests for new feed ingredients or requests to modify an existing feed ingredient definition are reviewed by AAFCO investigators chosen by the AAFCO Board and FDA scientists assigned by the agency’s division director or team leader in the Division of Animal Feeds (DAF).

C. AAFCO will seek advice and a letter of concurrence regarding the suitability of the feed ingredient for its proposed use from the FDA prior to adopting new feed ingredient definitions or amending existing ones.

D. AAFCO will provide to the FDA, upon FDA’s request (1) industry-generated requests and (2) requests from AAFCO for new feed ingredients and for modifications of existing definitions within 30 working days of AAFCO’s receipt of the complete request. AAFCO’s Board-assigned AAFCO feed investigator will make the initial contact with the FDA.

E. The FDA will allow the AAFCO Board or Board-assigned AAFCO feed investigator to request consultation from the FDA on requests for new feed ingredient definitions and modifications of existing definitions. AAFCO’s initial contact will be the director of the DAF, Center for Veterinary Medicine (CVM), FDA. The FDA will provide its decision on whether it will be able to consult with AAFCO and the DAF number assigned to the request within 30 working days.

F. If the FDA determines it will publish a food additive regulation of a requested ingredient definition under section 409 of the Act and FDA’s implementing regulations in 21 CFR 571.1 for a feed ingredient, AAFCO will not include that ingredient in the AAFCO OP until the FDA completes the regulation.

G. Disagreements on existing feed ingredient definitions, the establishment of new ingredient definitions, or modifications of existing definitions between the FDA and AAFCO will be referred to a review board. The review board will be comprised of two representatives from AAFCO appointed by the Board and two representatives from the FDA that are appointed by the director, FDA CVM Office of Surveillance and Compliance and the director, FDA CVM Division of Animal Feeds.

H. AAFCO will consider all requests from the FDA to remove an ingredient definition from the AAFCO OP upon the FDA presenting scientific evidence substantiating their conclusion the ingredient is no longer suitable for its stated intended use. The Ingredient Definitions Committee will vote on the FDA request to remove the ingredient from the Feed Ingredient Definitions section in the AAFCO OP at their next scheduled meeting. Disagreements between AAFCO and the FDA would be handled as stated in G.

I. AAFCO is allowed, on its own initiative and with FDA concurrence, to request that an AAFCO Feed Ingredient Definition be removed upon AAFCO providing scientific evidence substantiating their conclusion that the ingredient is no longer suitable for its stated use. The Ingredient Definitions Committee will vote to remove the
ingredient from the Feed Ingredient Definitions section in the AAFCO OP at their next scheduled meeting. Disagreements between AAFCO and FDA would be handled as stated in section G.

J. This Memorandum of Understanding will be reviewed annually by the AAFCO Board and the FDA and may be modified by mutual consent of both parties. Parties will provide each other with written notice 30 working days in advance regarding the modifications being sought. Any modification will be published in the Federal Register.

**Liaisons**

**For FDA:**
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**Period of Agreement**

This agreement, when accepted by both parties, will have an effective period of performance from date of signature until 10/01/2019 (and may be modified by mutual consent by both parties or may be extended or terminated as agreed upon by FDA and AAFCO). Any notice of termination will be published in the Federal Register.

**Approved and Accepted for FDA:**

**By** [Signature]

**Date:**

**Printed Name:** Steven Solomon, DVM

**Title:** Director, Center for Veterinary Medicine

**U.S. Food and Drug Administration**

**Approved and Accepted for AAFCO:**

**By** [Signature]

**Date:** 8-23-2017

**Printed Name:** Ken Bowers

**Title:** 2017 AAFCO President
**Education and Training Committee—Tim Lyons, Chair**

The AAFCO Education and Training Committee continues to work on training needs for AAFCO members to meet the needs that have developed under FSMA, the Animal Food Rules, the Animal Feed Regulatory Program Standards and continuing education for inspectors. Since the annual meeting, a survey was presented to committee members to determine some of the needs of AAFCO members. This survey will be discussed to help drive the agenda for the mid-year meeting in 2018. Members of the committee are working on documents to lead members to training locations, whether offered through on-line training or workshops that are offered that will meet the needs of everyone. One goal we should consider is development of training that both industry and regulators share.

Other issues the committee is working on is a training calendar, standardization of BITS and AITS training and how these trainings can be accessible to those states that are unable to send inspectors to trainings. Committee members continue to work with curriculum building and trainings that can be accessed through FDA’s Office of Training, Education and Development. The committee is also working with the Feed Labeling Committee on developing a workshop on feed labeling (non-pet food) to be held in conjunction with the 2018 AAFCO Annual Meeting. This workgroup has met several times already in preparation for this workshop.

The committee is planning to meet via conference call in November to continue to work to serve the needs of AAFCO. Many thanks go out to the members participating and providing input to making this committee as functional as possible through everyone’s busy workload. We greatly appreciate it!

**Inspection and Sampling Committee—Miriam Johnson, Chair**

We hope this newsletter finds everyone gearing up for the Holidays….because we all like turkey and pie, right? The newest change to the Inspection and Sampling Committee will be the change in Committee Chair. Chad Linton (WV) will be rolling out as the current committee chair while Miriam Johnson (NC) will be rolling in as the new committee chair by January 2018. Chad has promised, however, to remain on the committee and to not be far away.

The Inspection and Sampling Committee continues to update the *AAFCO Inspectors Manual* with current FSMA regulations and information to meet the needs of field staff. The committee will continue to make updates as they arise, but also welcomes thoughts from those in the field and their supervisors as to what is relevant and would be useful to those using this tool. If you have thoughts please send them our way for discussion.

Currently the sections being reviewed include current FSMA guidelines, the new VFD law and aseptic sampling techniques. Jacob Fleig (MO) has updated the VFD section of the manual and those additions are being added as we speak. Kevin Klommhaus (FDA) leads the group editing the FSMA guidelines section and will have additional information as to where that group is heading for us at the 2018 Midyear meeting in January in Anaheim, CA. Finally, Bob Geiger (IN), Miriam Johnson (NC) and the workgroup formed to review aseptic sampling techniques are continuing to work towards completing procedures to present to the committee for review. We plan to have the updated sections in the Inspectors Manual sometime soon. Thanks to each of you for your hard work on these updates. The ever evolving *AAFCO Inspectors Manual* will always be available in its most updated version on the AAFCO website under Publications.

The Feed Sampling Study continues to be led by Mark LeBlanc (LA) with the intent to verify the sampling procedures outlined in the *AAFCO Inspectors Manual* are the most scientific approach for sampling feed. The next step for the group will be to determine which analyte to test against as we work towards getting an RFP out in 2018 for conducting this study.
Meagan Davis (LA) continues to lead our committee with the planning and execution of the Basic Inspectors Training Seminar (BITS) and the Advanced Inspectors Training Seminar (AITS). BITS was held in Boise, ID, from October 24–26, 2017. The registration for BITS was full, great job Meagan, and AITS will be right around the corner in the spring/summer of 2018. We welcome states who would like to host either of the seminars to also let us know so that we can continue to conduct these trainings each year and provide our field staff with the knowledge they need to conduct their field assignments. Stay tuned for the 2018 seminar schedule so that you register your staff as soon as possible.

Any burning or pressing thoughts that you would like to bring to the attention of the committee? As always, they are welcomed. Please feel free to contact Miriam Johnson with committee and agenda topics. Wishing everyone a very happy holiday season and see you in 2018!

Laboratory Methods and Services Committee—Aaron Price and Nancy Thiex, Co-Chairs

Nibbles and Bits for Lab Rats (http://www.aafco.org/Laboratory)

The committee continues to be active in advancing analytical methodologies and best practices for animal feed and pet food testing laboratories. Specific methods that are currently being worked on by committee groups are as follows:

- New Official methods for tylosin and chlortetracycline analysis
- Official Method development for fat-soluble vitamins, carbohydrates, and mycotoxins
- Multi-element analysis methods
- Best practices for moisture analysis in feeds and pet foods

Official methods for sugars (mono- and di-saccharides) and fructans are being approached as a joint food and feed venture with AOAC INTERNATIONAL. The formal Working Group was launched September 24 in Atlanta, Georgia.

A working group is updating the committee’s Sampling Guidelines and will be renaming it Guidance On Obtaining Defensible (GOOD) Test Portions, which will serve as a companion document to GOODSamples for laboratory staff. Stay tuned for the publication of this document early in 2018.

The QA/QC sub-committee has posted a number of resources for labs on the AAFCO website that provides useful information for labs that are already accredited or working towards ISO/IEC 17025 accreditation. These can be found at the following link: http://www.aafco.org/Regulatory/Committees/Laboratory-Methods-and-Services/Feed-Quality-Assurance-Quality-Control-Working-Group.

The committee is advocating the creation of a State Feed Lab Network that would share testing capability and resources amongst the network. This is viewed by the committee as necessary due to the increase in residue and safety testing that is likely going to be required by FSMA regulations. The committee has presented their ideas to the AAFCO Board of Directors and a working group consisting of laboratory members (from State, Federal and private companies) along with Program and Inspection personnel will be formed to come up with recommendations.

One of the most recent committee initiatives has been a survey of mycotoxin testing laboratories to collect their expertise and best-practices on overcoming analytical challenges. It is expected that this group will create a publication, or series of publications that will outline their recommendations and solutions to these challenges.
• **2018 Midyear Meeting** ([http://www.aafco.org/Meetings/Midyear/2018](http://www.aafco.org/Meetings/Midyear/2018))

The committee had a very productive full-day meeting August 11, 2017, in Bellevue, Washington, and will meet again during the AAFCO Midyear meeting in Anaheim, CA. All are welcome to attend this session which is tentatively scheduled for Tuesday, January 23, 2018, from 8 am to 5 pm. Check the AAFCO Meetings webpage for the latest version of the meeting Agenda.

**Proficiency Testing Program Committee—Brenda Snodgrass, Chair**


The Proficiency Testing Program (PTP) is pleased to announce the AAFCO Proficiency Testing (PT) added the Minerals Scheme to the International Standard ISO/IEC 17043:2010 Scope of Accreditation in September 2017. The current scope can be viewed/downloaded [read more…].

The PTP managers are now working to expand our Accredited Scope to include the Mycotoxin Contaminants Scheme. Additionally, the entire team is busy serving the program’s participants, maintaining quality system requirements, making program improvements, and training. Please visit our website at [http://pt.aafco.org](http://pt.aafco.org).

The 2018 Proficiency Testing Program (PTP) Schemes are available for purchase. This include the Animal Feed, Pet Food, Minerals, and Mycotoxin Contaminants Schemes. The prices for the four programs have been raised 25%: $375 for Animal Feed, Pet Food, and Minerals, $550 for Mycotoxin Contaminants. This was necessary because our five-year Cooperative Agreement ended August 31, 2017.

The PTP managers are looking forward to updating the 2018 mid-year meeting attendees in Anaheim, CA, on January 22, 2018. We hope to see you there!

**Pet Food Committee—Kristen Green, Chair**

The Pet Food Committee (PFC) continues its work in exploring ways to modernize pet food labeling. The label modernization project is a major focus for PFC and the work will increase over the coming year. The four subgroups of this workgroup have been meeting and making progress. Each subgroup presented progress and accomplishments made within each group at the annual meeting in Bellevue, WA. The four subgroups are Nutritional Adequacy/Feeding Directions, Safe Handling, Pet Nutrition Facts Box, and Ingredients.

The PFC workgroup dedicated to updating the Business of Pet Food and AAFCO Talks Pet Food websites is meeting every two weeks and will have a progress report for the 2018 midyear meeting. The workgroup members are Liz Beckman (chair)–WA, Liz Higgins–NM, Jo Lynn Otero–NM, Tiffany Leschishin–MN, Kristin Hamilton–ID, Laura Earhart–VA, Kathleen Close–FDA, Mollie Morrissette–PWA.
AAFCO Pet Food Committee’s Pet Food and Specialty Pet Food Labeling Workshop was held immediately after AAFCO’s Annual Meeting in Bellevue, WA, on August 12–13, 2017. The workshop was a huge success with 218 attendees including 24 volunteers that helped present the topics and lead small groups through breakout activities. Feed control officials and industry representatives were paired which gave a better perspective to each topic. The AAFCO Pet Food and Specialty Pet Food Labeling Workshop was designed to enable control officials, individuals from the pet food and specialty pet food industry, and others to better understand and interpret the AAFCO Model Regulations for Pet Food and Specialty Pet Food. The 1½ day workshop covered both the basics of pet and specialty pet food labeling as well as more complex issues such as product claims with five breakout sessions. The agenda can be viewed at [read more...]. A good understanding of the AAFCO Model Regulations is essential to any firm wishing to market pet foods and specialty pet foods, treats, and supplements in the United States.

Since there was such a good response to the workshop and the fact that the workshop filled and there was a waiting list, the decision was made to hold another workshop on January 24–25, 2018, immediately after the AAFCO Midyear Meeting in
Navigating Pet Food Product Claims, Part 1: Scientific

Product claims are nothing new to the human or pet food industries. In fact, it is not unheard of to see health claims in both categories. Some people may have you believe that health claims are unique only to the pet food category; however, the Food and Drug Administration (FDA) has allowed health claims on human products since 1990 (FDA, 2017a). Additionally, both the human and pet food industries share much of the same claim types and hierarchies of required proof.

Pet Food Claims 101

Originally, I was going to write a single blog post about pet food product label claims; however, following my recent attendance at the Association of American Feed Control Officials (AAFCO) Pet Food Labeling Workshop in Bellevue, Washington, USA, I thought a single blog post would serve the industry a huge injustice. Although one would think a room full of regulatory people and issues would be the last place you would want to hang out, I found this to be one of the most informative meetings I have attended in a long time. Topics ranged from the basics, such as ingredient statements and guaranteed analysis, to the more complicated and often debatable product claims.

If you do not have the ability to attend one of the sessions,
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I suggest you purchase the AAFCO Pet Food Labeling Guide. This book is easy to follow and is a good back-up in “goof-proofing” your claims.

How Do I Decide What Type of Claim to Make?

The short answer, it depends. Do you want to make hard-hitting and differentiating science-based claims, or do you want to make “belly button” claims (i.e., everybody has one). I think it is fair to say that if you are making meat-first, natural, grain-free or farm-to-table claims and think you are differentiating, then you need to take a hard look at your marketing team.

If you are wanting to make differentiating claims that stand out from the pack and make your product or brand unique, then you need to understand the different types, levels of claims and their requirements. By understanding these levels and requirements, you can prevent or delay your competition from making similar claims while staying in regulatory compliance. These claims can be anything from supply chain, novel ingredients, nutritional or scientific categories, to name a few.

Pet Food Product Claims

Since there are many claim types, I decided to break up my discussion of product claims into a multipart series. Also, it is important to recognize that some claims are not always reflective of FDA or AAFCO’s regulations or guidance and may result from outside organizations and agencies. For example, claims like “Made in the USA” must meet the guidance set forth by the Federal Trade Commission. Organic and humanely raised must meet the requirements and be certified by the National Organic Program (USDA-AMS) or certain non-government organizations. Since scientific claims can fall into all the categories, I will focus on these claim types in this blog post.

Puffery to Drugs

The simplest and least burdensome scientific claims are generally classified as puffery claims. Puffery claims are typically general (vs. literal), objective and are hard to prove or disprove. I like to use

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the farm-to-table claim as an example. Some companies can track their food supply down to farmer Joe in Kansas. While other companies may not be able to get down to that level of detail, they can make similar claims because chickens and rice come from farms. It can imply higher quality or healthier products, depending on the consumer.

Just remember, if you make this claim, be prepared to explain your supply chain to your consumer. I will dive deeper into this claim in future blogs since it also has other meanings and implications and seems to be the new popular claim.

Drug claims are on the other end of the spectrum. If your food makes any claims to treat, prevent, cure or mitigate a disease (or an implied disease like inflammation), then you will likely fall into the drug category.

Proof Behind the Scientific Claims

Therapeutic foods require veterinary oversight, must not present a known safety risk, not include representations of disease or treatment on the product label and not be marketed as an alternative to approved new animal drugs (in addition to regular pet food labeling requirements). Although over-the-counter foods may utilize similar claims, therapeutic foods generally use published (structure function—claim) and clinical studies to support their claims.

What Does Clinical Really Mean?

Most companies like to use the word “clinical” when they describe the study or studies, but what does it mean? To the consumer it can mean white lab coats, a sterile setting like a veterinary clinic and hundreds to thousands of dogs or cats on the study. To the researcher and person developing the claims, it simply means a group of dogs or cats tested the product or nutrition in an experimental setting (i.e., a kennel).

Don’t Believe Me?

Just check out the minimum feeding protocol for proving an adult maintenance claim for a dog or cat food (AAFCO, 2017). If I run that study, I can make the claim clinically shown to maintain weight. If I run two or more of those studies using the same food, guess what? I am clinically proven now. Depending on what you measure as outcomes of the study, the claim could be tied to weight loss, blood parameters, mobility, etc.

Additionally, if the claim says clinically tested or proven nutrition, then the consumer is not feeding the actual food tested – simply the same nutrition. For example, if it is tied to a certain protein level, then the food in the marketplace may only have the same protein level, not the other nutrients or ingredients that were actually tested in the study.

Also, I would be remiss if I didn’t mention that the same eight-dog or cat study is what gives companies the claim, Animal feeding tests using AAFCO procedures substantiate that Product XYZ provides complete and balanced nutrition for canine (or feline) adult maintenance.

Next Topic: Navigating Through Product Claims: Part 2

Next time we will discuss this topic: “Navigating through product claims: part 2.” If there are topics you would like to have discussed, feel free to comment below or reach out via LinkedIn: www.linkedin.com/in/ryanyamka.

References


Awards

Dave Edwards–FDA presented the 2017 Leveraging/Collaboration Award to the FDA/AAFCO Reconditioning Compliance Program Working Group for development and execution of the Federal and State Reconditioning Compliance Program Process through collaboration and partnership, complying with ACT 304 (d)(1) and CPG 675.200.

FDA/AAFCO Reconditioning Compliance Program Working Group: FDA ORA, Kansas Department of Agriculture, Louisiana Department of Agriculture, Michigan Department of Agriculture, Minnesota Department of Agriculture, Nebraska Department of Agriculture, Office of Indiana State Chemist, Pennsylvania Department of Agriculture, and Tennessee Department of Agriculture.

Ken Bowers, KS.

Eric Brady, TN.

David Dressler, PA

Mark LeBlanc, LA.
In Memoriam

Herma Johnson was the Director of Regulatory & Environmental Affairs with the West Virginia Department of Agriculture for almost 44 years. Herma began her career with the department in 1973 and worked her way up to become Director of Regulatory and Environmental Affairs. Herma Gail Hanshew Johnson passed away from a stroke on Monday, August 7, 2017. AAFCO extends their condolences to her family.