



Final: 9/11/17 ver 4

## **AAFCO Ingredient Definitions Committee Report**

August 11, 2017 Bellevue, Washington, USA

Hyatt Regency

### **Recommendations to the Board and Association membership:**

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

- 1) Publish the following tentative definitions as Official and remove the existing Official definition if any.
  - a) T9.10 Poultry By-Product Meal
  - b) T9.14 Poultry By-Products
  - c) T9.57 Poultry
  - d) T9.71 Poultry Meal
- 2) Establish and publish in the OP a new tentative definition(s) for:
  - a) T73.311 **Hydrogenated Glycerides**. Feeding rate to reflect initial approved intended uses as a pellet binder. Keep old 33.19 in place if industry provides safety data by 1/5/18. If no data delete 33.19 at the mid year IDC meeting.
  - b) T73.051 **Iron Tartrates**
- 3) Add a new item #20 to the GRAS Notification table in section 101.

#### **Board Action:**

To be considered in October 2017

#### **Association Action:**

To be considered in January 2018

## **Ingredient Definitions Committee Minutes 8/11/17**

### **1) Role Call of Committee members present (quorum was present)**

Alan Harrison, Ali Kashani, Bob Church, Brett Groves, Charlotte Conway, Dave Phillips, David Dressler, Erin Bubb, George Ferguson, Jacob Fleig, James Embry, Jennifer Kormos, Ken Bowers, Kent Kitade, Laura Scott, Mark Le Blanc, Mika Alewynse, Richard Ten Eyck, Steve Gramlich, Nathan Price

### **2) Investigator recommendations to move tentative to official**

a.) T9.10 Poultry By-Product Meal – make Official

Brett Boswell moves to ACCEPT. Erin Bubb seconds. MOTION PASSES.

b.) T9.14 Poultry By-Products – make Official

Brett Boswell moves to ACCEPT. Brett Groves seconds. MOTION PASSES.

c.) T9.57 Poultry – make Official

Brett Boswell moves to ACCEPT. Brett Groves seconds. MOTION PASSES.

d.) T9.71 Poultry Meal – make Official

Brett Boswell moves to ACCEPT. Brett Groves seconds. MOTION PASSES.

e.) T33.25 Stearic Acid – stay tentative

Ken Bowers moves to ACCEPT. Jacob Fleig seconds. MOTION PASSES.

More information will be coming forward for stearic and palmitic acids. Both will be revisited in the future.

f.) T33.26 Palmitic Acid – stay tentative

Ken Bowers moves to ACCEPT. Jacob Fleig seconds. MOTION PASSES.

More information will be coming forward for stearic and palmitic acids. Both will be revisited in the future.

g.) T36.14 Direct-Fed Microorganisms

Tabled to the 13 October 2017 meeting.

h.) T60.117 Dried Black Soldier Fly Larvae

Tabled to the 13 October 2017 meeting.

### **3) Work Group Reports**

a) AAFCO-Affirmed GRAS workgroup report – Tabled to the 13 October 2017 meeting.

b) DFM Nomenclature Changes workgroup – Tabled to the 13 October 2017 meeting.

c) Negative List Workgroup – Tabled to the 13 October 2017 meeting.



#### 4) New Definitions, deletes & edits:

a) New Feed Term “Livestock” – Ali

Ali Kashani proposed to form a work group to develop the definition and report out at the 10/13/17 meeting.

Work Group: Ali Kashani, Charlotte Conway, Leah Wilkinson, Kristy Smedley, Cathy Alinovi

~~b) Section 30 header edits – Jan~~ (will be on the 10/13/17 agenda)

c) Table 30.1 edits – Jan

Mika Alewynse moves to ACCEPT. Mark Le Blanc seconds. MOTION PASSES.

Mika Alewynse stated that this is a reclassification request. The source organism, *Penicillium funiculosum*, has undergone a nomenclature change. There are three sections that are affected.

In Table 30.1 under beta-Glucanase and Xylanase, *Penicillium funiculosum* will be deleted and replaced with *Talaromyces veratilis* and *Talaromyces funiculosus*. Under Phytase, *Penicillium funiculosum* will be deleted and replaced with *Talaromyces funiculosus*.

*Section editor will update. No association action needed.*

d) 54.31 Dried Cheese Product, add to 22.1 Animal Protein Products. – Jacob

Jacob Fleig moves to ACCEPT. Brett Groves seconds. MOTION PASSES.

Editorial change and FDA concurs to move to the collective term Animal Protein Products.

*Section editor will update. No association action needed.*

e) 54.32 Dried Cheese, add to 22.1 Animal Protein Products. – Jacob

Jacob Fleig moves to ACCEPT. Brett Groves seconds. MOTION PASSES.

*Section editor will update. No association action needed.*

f) T73.311 (keep old 33.19) Decrease Hydrogenated Glycerides feeding rate

Charlotte Conway moves to ACCEPT. Dave Phillips seconds. MOTION PASSES.

Charlotte Conway said that FDA had received a few questions regarding hydrogenated glycerides. Charlotte Conway looked closer at the issue and found that it was requested and approved for a specific use and use rate. This was conveyed to the investigator, but it did not make it into the ingredient definition. These could have contaminants resulting from the production process, and safety assessment has not been conducted for other uses or use rates. It was suggested to move this definition to the Technical Additives section.

Debbie Baldwin asked that this definition remain in the Fats and Oils section. ACI is conducting a comprehensive review of all ingredients in the Fats and Oils section, including hydrogenated glycerides. ACI is investigating the uses of hydrogenated glycerides.

Leah Wilkinson stated that AFIA is conducting a similar assessment and asked if the definition is moved to the Technical Additives section that it also be kept in the Fats and Oils section.

David Meeker agree with Debbie Baldwin and Leah Wilkinson. He urged that more time is needed to conduct an assessment on hydrogenated glycerides use.

Richard Ten Eyck asked what safety concerns are there? Charlotte Conway stated that there can be contaminants from the production process. A safety assessment would need to be conducted for any new uses.

Charlotte Conway suggests that we keep the old definition and add T73.311 with the specific use and use rate.

Data for a safety assessment is requested to be sent from industry to CVM by January 5, 2018 or the old definition 33.19 will be deleted at the Mid-Year AAFCO IDC meeting.

**T73.311 (old 33.19) 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)

g) T73.051 Iron Tartrates – Richard

Mika moves to ACCEPT. Dave Phillips seconds. MOTION PASSES.

Iron tartrates is used as an anti-caking agent. It was asked how can iron tartrates be measured? It is difficult to measure tartrates; therefore, iron is used to measure iron tartrates.

**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.

h) GRAS Notification #20 into section 101- Nathan

Nathan Price moves to ACCEPT. Dave Phillips seconds. MOTION PASSES.

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 Saccharomyces cerevisiae	Saccharomyces cerevisiae expressing xylose isomerase from Piromyces 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.	4/29/2016	<a href="#">FDA has no questions.</a> (PDF - 4 pages)

5) Discussions:

a) ~~Status on high profile ingredients (if needed) — Richard / CVM~~

b) Update on lawsuit on GRAS notices, state impact.

David Edwards reported that some of the same groups that filed a lawsuit requiring the agency to publish the final rule on GRAS notices by a specific time have filed a new lawsuit in regards to the GRAS notice final rule. This lawsuit is going through the all the normal processes and is currently under review. The GRAS program continues as outlined in the final rule.

c) Standard of identity Template Functions

Tabled to the 13 October 2017 meeting.

d) Hemp Update – Bob & Brett, Geiger, Colorado

Bob Church has informed some hemp producers to get a feed ingredient definition for hemp seed meal and has encouraged them to submit a package. Brett Boswell stated that it is the same for hemp seed oil. So far, no packages have been submitted.



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Many states are receiving questions about hemp seed meal and hemp seed oil. FDA also receiving questions, but no pre-submissions meetings have been requested.

Colorado passed a bill to review the industrial hemp usage in animal feed. Numerous stakeholders on the work group to begin meeting Aug 24. The work group will be broken into 3-4 sub-groups. Initial review to see how industrial hemp can be used in animal food and how to move forward.

Pet food consumers do want to see hemp seed products for their pets. Bob Church inquired as to the reasoning for this. The response was that consumers want natural products to treat seizures and arthritis. Charlotte Conway stated that treatment for seizures and arthritis would be considered drug claim and would have to go through a different review process. Hemp seed meal and oil will likely have a use limit in animal food.

A concern was raised that hemp products are running rampant in the pet food industry and if states are using enforcement discretion. Church responded if any animal food products contain any hemp products, Montana does not approve the products for registration. The same is true for Minnesota.

Doug Lueders has been challenged to use hemp cake in livestock feed. The hemp cake producer is feeding his own livestock the hemp cake and getting the meat approved by USDA and is selling the meat for public consumption. They cannot regulate the feeding of livestock. Doug Lueders urged for a resolution regarding the use of hemp products in animal feed.

Bob Geiger recently represented AAFCO at a hemp regulators conference. He said that the same things discussed here were discussed at the conference. There was a lot of discussion regarding drug vs. feed. Bob Geiger received lots of questions at the conference and went through the AAFCO approval process.

Hemp feed ingredient would come from industrial hemp not from marijuana. Richard Sellers stated that there is a definition in Virginia's 2013 Farm Bill for industrial hemp. Everything is tightly controlled. There is hemp seed in human food. Is it GRAS for human food? Charlotte Conway stated that there has been no notification submitted to CFSAN.

~~e) Discussion of common human foods in pet food (placeholder)~~

f) Next committee meeting will be a webinar Friday 10/13/17 8:15 am PST

Minutes approved 9/11/2017 with 19 Affirmative votes.