



Final Version accepted by IDC 3/10/17

AAFCO Ingredient Definitions Committee Report on mid-year meeting held 1/17/17 in Mobile, Alabama.

Recommendations to the Board and Association membership: *When needed, new text is presented in attachment A of this report.*

- 1) Publish the new Section 101 header including the introductory paragraphs and the table header row of the new GRAS notice table in the OP.**
- 2) Publish a new microorganism to the list in Definition T36.14 Direct-Fed Microorganisms:**
 - a. *Bacillus amyloliquefaciens*
- 3) Publish these definitions as official:**
 - a. 3.5 Direct Dehydrated Alfalfa Meal or Pellet – Moving T3.5 to official
 - a) 87.20 Guanidinoacetic acid – Publish as official (CFR listed)
 - b) 87.115 Canthaxanthin - Publish as official (CFR listed)
- 4) Publish these as new Definitions as tentative:**
 - a. T96.14 *Scheffersomyces stipitis* Dried Yeast
- 5) Delete these items from the OP:**
 - a. Delete Canthaxanthin from Table 87.5 - if 87.115 is added.

Financial and revenue needs:

IDC has no direct financial requests at this time. The scientific review of ingredients prior to marketing continues to take an excessive amount of time. It may take association resources to expedite the current process or provide suitable alternatives to establish an ingredient standard of identity acceptable to state members.

The committee approved several editorial changes not requiring further Board or Association Membership action. Among them:

- 6) Make these editorial changes:**
 - a. Enzyme Section 30 – Section introduction language and Enzyme Table 30.1 header
 - b. Definition 36.14 and T36.14 edit the opening paragraph by adding, “These microorganisms must be nontoxicogenic.”
 - c. 57.165 Zinc Hydroxychloride, added poultry to the intended species listed in the newly approved official definition.
 - d. 73.026 Feed Grade Sodium Formate, added poultry to the intended species listed in the newly approved official definition.
 - e. 93.5 Wheat Middlings , changed the crude fiber maximum to 11%



Ingredient Definitions Committee Meeting 1/17/17 Minutes

1:30pm – 3:00pm Central time, Mobile, Alabama
Renaissance Mobile Riverview Plaza Hotel
Bon Secour Bay Room

The meeting was convened at 1:30 pm by Chairperson Ten Eyck.

1) Role Call of Committee members

Committee Members: Richard Ten Eyck, Mark Le Blanc, Mika Alewynse, Erin Bubb, Charlotte Conway, Jacob Fleig, Steve Gramlich, Brett Groves, Alan Harrison, James Embry, April Hunt, Jan Jarman, Shannon Jordre, Jennifer Kormos (phone), Laura Scott, Dave Phillips, David Dressler, Bob Church, Dan King, Ken Bowers, Kent Kitade. A quorum is present (21/25).

2) Investigator recommendations to move from tentative to official

a) T3.5 Direct Dehydrated Alfalfa Meal or Pellet - Erin

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

Ken Vaupel (Alfagreen Supreme, by phone) commented after the motion passed if he could comment on the definition. He thanked the committee and reminded them that in Charleston there was discussion that the Direct Dehydrated Alfalfa cannot come from sun dried alfalfa. He believes that there is still work to be done on this definition.

3) Work Group Reports

a) AAFCO Affirmed GRAS workgroup report

Leah Wilkinson - Most state laws need the feed ingredient to be published in the OP or have a 21 CFR regulation. The FDA has now published the final rule on the GRAS Notification. This AAFCO IDC WG was formed over a year ago and was tasked to discuss the inclusion of GRAS substances into the Official Publication. The WG's first project has been to develop a proposed new OP section that would include GRAS notified-substances that have received a No Questions letter from the FDA. As part of this project, the WG organized a survey of feed control officials to understand what were their views on GRAS-notified substances and on GRAS substances more broadly. The WG is now proposing the States consider Section 101 be added to the



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OP. This section would have introductory paragraphs, and a table with links to the FDA Animal GRAS Inventory site. The table would contain only the GRAS substances that have received a No Questions letter from the FDA.

In response to a question raised by Brett Groves, Richard Ten Eyck said that the section editor will bring the updated list of animal food GRAS Notices that have been evaluated by FDA and received a No Questions letter through the IDC.

The Committee asked for clarification on the table. David Dressler asked, if an animal species is not listed in the GRAS substances table, does that mean that the substance is not GRAS for that species. Kristi Smedley replied that the GRAS substance is GRAS for a very specific intended use. In the case of notifications, if a species is not listed in the table, then that use of the substance was not a part of the notification.

Gary Yingling, counsel for the Enzyme Technical Association; on phone, Provided a prepared statement in support of proposed Section 101.

Mark LeBlanc moves to ACCEPT the WG report. Shannon Jordre seconds. MOTION PASSES.

Steve Gramlich moves to ACCEPT the header including the introductory paragraphs and the header row of the table. David Dressler seconds. MOTION PASSES. *Text is in attachment A*

b) DFM Reclassification Workgroup – Jan Jarman

Jan Jarman explained that the WG formed last August because several of the organisms have been reclassified and, as a result, some of the microbe names used in the 36.14 definition may be out of date. Kristi Smedley and Leah Wilkinson along with others put together a table with the list of organisms and indicated the necessary changes. There are six organisms that need renaming to a species not currently listed in 36.14, and a literature-based safety review has been requested by FDA. Some changes will not require a safety review as it is either an editorial change or the change is to currently listed organisms. Potential name changes have implications for labels. Jan Jarman would like to broadly distribute the table only after agreement has been reached in the WG with Mika Alewynse (time frame for alignment 2-3 weeks). Kristi Smedley noted that there are changes in microbial nomenclature because of scientific changes and also mistakes that were entered in 1996. There is a spelling mistake as well. Some re-classified organisms will be changed to ones that are already listed – in such cases, the original organism that changed would no longer be listed. Jan just want to introduce the topic. Mika Alewynse said that in all



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probability there will need to be safety assessments (literature review only) to list the new name (if not already on the list).

4) New Definitions, deletes & edits:

a) Enzyme Table header edits – Jan Jarman *Text is in attachment A*
Brett Groves moves to ACCEPT. David Dressler seconds. MOTION PASSES.

b) T36.14 *Bacillus amyloliquefaciens* – Jan Jarman/Mika Alewynse Add organism to the list in definition T36.14
Jan Jarman moves to ACCEPT. Mika Alewnse seconds. MOTION PASSES.

c) 36.14 & T36.14 Header edit to read: (added language is bolded and underlined)

36.14 Direct-Fed Microorganisms – The microorganisms listed below were reviewed by the U.S. 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.**

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

This is an editorial change. Mika Alewynse stated that the change is being driven by the change in nomenclature and genomic analysis. As science has progressed these species have been moving closer, and it is necessary to access the safety of the organism. This statement was lifted from the enzyme table (Table 30.1 – “...nonpathogenic and nontoxicogenic.”)

Leah Wilkinson stated that the AFIA membership does not think that this sentence is necessary; it is redundant. This is part of the responsibility of the manufacture to ensure the safety of the product. In addition, there is a concern in regards to trade (export) – foreign governments might have concerns in regards to this addition. The AFIA membership proposes “These microorganisms must be safe” as an alternative clarifying statement.

Jan Jarman asked if there are any issue with this (trade/export) in regards to the enzymes. Emily Helmes stated that there is no issue with enzymes or the enzyme table. Mika Alewynse stated if we say safe it could bring in other issues -- most organisms on the list are safe but if they are fed to the wrong species, there could be issues. She said that we need to be careful how we define safe. Kristi Smedley stated that safety should be specific to the intended use.

d) 57.165 Zinc Hydroxychloride Edit – Jennifer *Text is in attachment A*



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Jennifer Kormos moves to ACCEPT. April Hunt seconds. MOTION PASSES.
This is an editorial change to add poultry to the newly approved official definition.

- ~~e) 57.29 Metal polysaccharide complex Edit – (placeholder) – Jennifer~~
- f) 73.026 Expansion of the newly accepted Feed Grade sodium formate approval as an acidifier in complete poultry feed *Text is in attachment A*
Mika Alewynse moves to ACCEPT as an editorial change. April Hunt seconds. MOTION PASSES.
- ~~g) 71.XXX Brassica carinata (placeholder)~~
- h) 87.20 Guanidinoacetic acid – Richard Ten Eyck *Text is in attachment A*
Brett Groves moves to ACCEPT. Mark Le Blanc seconds. MOTION PASSES.
At the end of the definition, change “Proposed” to “Adopted” and add definition number 87.20.
- i) 87.115 Canthaxanthin - color additive – Richard Ten Eyck *Text is in attachment A*
Mark Le Blanc moves to ACCEPT. Steve Gramlich seconds. MOTION PASSES.

Need to delete Canthaxanthin from Table 87.5
Dave Philips moves. Steve Gramlich seconds. MOTION PASSES
- j) 93.5 Wheat Middlings – Edit -Dave Phillips Editorial change of crude fiber specification. Committee discussed if this needed an association vote. Agreed interested parties were represented here with no opposition to the change.
Text is in attachment A
Dave Phillips moves to ACCEPT. Steve Gramlich seconds. MOTION PASSES.
- k) Add section 101 GRAS Notifications to the OP – Addressed above *Text is in attachment A*
- l) T96.14 Scheffersomyces stipitis Dried Yeast – Mika Alewynse Publish a new tentative definition. *Text is in attachment A*
Need to correct the spelling (stipitis not stipites)
Alan Harrison moves to ACCEPT. Jan Jarman seconds. MOTION PASSES.

5) Discussions:

- a) Materials NOT suitable for animal feed list in the BIN or website – AAFCO
A “Reading Room” has been set up on the FEED BIN. Ready to start working on this and forming a WG to flesh out on how this information should be shared with Industry. David Dressler thinks that this is a good



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idea – if something has been reviewed and not accepted, the information should be public. Leah Wilkinson suggested that a discussion should be had – there are pluses and minuses – how do we get things off the list once you are put on it. Jan Jarman stated that this should not be in the OP. Richard Ten Eyck agrees. Leah Wilkinson also stated that there may be some companies that have done GRAS self-determinations. Jason Vickers said there are several mechanisms for new ingredients – GRAS Notification, GRAS self-determination, FAP, new ingredient definition. Is this work of great value? Richard Ten Eyck stated that it may be easy to have a listing of ingredients that have not been approved.

Leah Wilkinson, Richard Ten Eyck, Dave Dressler, Cathy Alinovi, Dave Phillips, Steve Gramlich, Susan Thixton, someone from FDA/CVM, PFI and Jan Campbell to form a WG to discuss this topic.

b) Status on high profile ingredients (if needed) – Richard Ten Eyck/ CVM
Richard Ten Eyck also brought up hemp seed oil and hemp seed meal – might need a policy on the proper use of hemp. It was also mentioned that “hemp heart” (dehulled hemp seed) is also being sold in food and feed. Bob Church stated that Montana has policy that no hemp products will be allowed in animal feed. Leah Wilkinson tries to notify state regulators if there is something to watch out for. She will continue to look out for these instances and will help notify the states. Richard will develop Hemp guidelines and circulate them to the Committee and the Board in attempt to build a consensus position to support states.

c) Discussion of common human foods in pet food
Human foods as they move to animal food; when does the common name no longer work? Charlotte Conway brought up peas/pea protein as an example. Peas are food that we eat, but when it gets processed it is no longer the same food. The processing can concentrate (make a change in the food), so it is no longer the same food. Blueberries are food and okay for animals but blueberry pumice needs to be defined and is now different than the traditional food.

Susan Thixton brought up cricket meal as another thing that is being used in pet food. What are Regulators going to do – let it go? Jan Jarman stated that no, regulators will not approve cricket meal. Charlotte Conway talked with “cricket ranchers” to help them understand that cricket meal needs to be defined. Hopefully companies/people will do the right thing.

Leah Wilkinson stated that she is also trying to help people understand that a definition is needed. Some people don’t want to go through the process and deal with FSMA. Charlotte Conway said different safety



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evaluations may be needed for different things. People should talk with FDA.

d) We will be establishing standing quarterly meeting dates for the committee. In addition to our two face-to-face meetings during the AAFCO meetings, we will meet by webinar on Friday March/10/2017 and Friday October/13/2017.

Richard Ten Eyck said that GRAS items to be included in the Section 101 table will be on the March agenda. They need a Section Editor and Investigator for this Section.

Leah Wilkinson asked if these meetings will be timed before the next Board meeting. Richard Ten Eyck confirmed that they will.

Leah Wilkinson asked what kind of deadline to get things posted to the BIN for the investigators. Richard Ten Eyck stated that he would like things to be posted one month ahead, but can be flexible with placeholders.

Kristi Smedley stated that there should be an update from the DFM WG by the March meeting.

e) Stale definition requests: We will remove material from definition consideration if the investigator is not contacted by the 1/17/17 meeting.

1. Camelina Meal –additional use,
2. ~~HEA Rapeseed meal,~~
3. Soy Fiber Isolate,
4. chlorella algae meal as source of omega 3,
5. Calcium Chloride –new source,
6. Chromium Tripicolinate –additional uses,
7. copper urea sulfate,
8. Kaolin –additional uses.

Jennifer Kormos stated that Chromium Tripicolinate should be removed from AAFCO consideration. The submitter did not want to pursue.

Bob Church stated that HEA Rapeseed meal is still active.

There has been no communication back from the industry on the others.

Meeting adjourned 3:02 pm.

Follow up Discussion items: Investigators may want to have a meeting with CVM on how to provide a better request review.

Minutes approved by committee during webinar 3/10/17.



Attachment A for minutes of IDC meeting 1/17/17

3.5 Direct Dehydrated Alfalfa Meal or Pellet is the aerial portion of the alfalfa plant, reasonably free of other crop plants, weeds and mold, which has not been stored in bales or in stacks as suncured alfalfa hay prior to being ground and dried by thermal means under controlled conditions. (Proposed 2016, Adopted 2017 rev 1)

Edit OP Section 30 enzymes by adding the red (bolded and underlined) text:

*See the "Enzyme Marketing Coordination" document which appears under chapter 5. page 348.

The immediate following pages contain Table 30.1, Enzymes/Source Organisms Acceptable for Use in Animal Feeds. **The purpose statement of a product label shall include a statement of enzyme functionality ("Function" and/or "Supported Use" as stated in Table 30.1) if enzymatic activity is represented in any manner.**

30.1 Enzymes/Source Organisms Acceptable for Use in Animal Feeds

In the case of microbial enzymes, it is understood that they are produced from nonpathogenic and nontoxic strains.

Classification/ Name	Source Organism	Typical Substrate ¹	Function	Current Supported Use ²
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²The Supported Use column references additional enzyme functionality beyond that in the Function column, and does not limit the enzyme functionality statement to specific animal species.

36.14 Header and T36.14 Header edit to read:

36.14 Direct-Fed Microorganisms – The microorganisms listed below were reviewed by the U.S. 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 nontoxic.**

57.165 Zinc Hydroxychloride is the hydrolysis product of zinc chloride having the empirical formula $Zn_5(OH)_8Cl_2 \cdot (H_2O)$. The particle size must not exceed 100 microns. It must contain not less than 54% zinc and is intended to be a source of zinc for use in livestock, **poultry**, and companion animal diets. It must not contain more than 20% chloride, 90 ppm lead, 15 ppm chromium, 10 ppm arsenic, 10 ppm cadmium, and 0.2 ppm mercury. (Proposed 2015 rev 1, Adopted 2017 rev 1, Revised 2017 rev 1)

73.026 Feed grade sodium formate -The food additive, feed grade sodium formate, may be safely used in the manufacture of complete swine **and poultry** feeds in accordance with the following prescribed conditions:



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- (a) The additive is manufactured by the reaction of 99 percent formic acid and 50 percent sodium hydroxide in water to produce a solution made up of at least 20.5 percent sodium salt of formic acid and not more than 61 percent formic acid.
- (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.
- (c) To assure 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 label and labeling shall contain:
- (1) The name of the additive.
 - (2) Adequate directions for use, including a statement that feed grade sodium formate must be uniformly applied and thoroughly mixed into complete feeds and that the complete feeds so treated shall be labeled as containing feed grade sodium 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 assure safe use of the additive, in addition to the other information required by the act and paragraph (d) of this section, the label and labeling shall contain:
- (1) Appropriate warnings and safety precautions concerning feed grade sodium formate.
 - (2) Statements identifying feed grade sodium formate 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 (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 573.696 (Adopted 2017 rev 1, Edited 2017 rev 1)

87.20 Guanidinoacetic acid - The food additive, guanidinoacetic acid, may be safely used in broiler chicken and turkey feeds in accordance with the following prescribed conditions:

- (a) The additive is manufactured by reacting glycine with cyanamide in an aqueous solution.
- (b) The additive is used or intended for use to spare arginine and as a precursor of creatine in broiler chicken and turkey feeds at levels not to exceed 0.12 percent of the complete feed.
- (c) The additive consists of not less than 97 percent guanidinoacetic acid [N-(aminoiminomethyl)-glycine] (CAS 352-97-6) by weight.



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- (d) The additive meets the following specifications:
- (1) Dicyandiamide not to exceed 0.5 percent;
 - (2) Cyanamide not to exceed 0.01 percent;
 - (3) Melamine not to exceed 15 parts per million (ppm);
 - (4) Sum of ammeline, ammelide, and cyanuric acid not to exceed 35 ppm; and
 - (5) Water not to exceed 1 percent.
- (e) To assure safe use of the additive in addition to the other information required by the Federal Food, Drug, and Cosmetic Act:
- (1) The label and labeling of the additive, any feed premix, and complete feed shall contain the name of the additive.
 - (2) The label and labeling of the additive and any feed premix shall also contain:
 - (i) A statement to indicate that the maximum use level of guanidinoacetic acid must not exceed 0.12 percent of the complete feed for broiler chickens and turkeys; and
 - (ii) Adequate directions for use.

21 CFR 573.496 (Adopted 2017 rev 1)

87.115 Canthaxanthin – The color additive, canthaxanthin, may be safely used in the manufacture of animal foods in accordance with the following prescribed conditions:

(a) Identity.

- (1) The color additive canthaxanthin is β -carotene-4,4'-dione.
- (2) Color additive mixtures for food use made with canthaxanthin may contain only those diluents that are suitable and that are listed in part 73.1 of Title 21 of the Code of Federal Regulations (21 CFR 73.1) as safe for use in color additive mixtures for coloring foods.

(b) Specifications.

Canthaxanthin shall conform to the following specifications and shall be free from impurities other than those named to the extent that such other impurities may be avoided by good manufacturing practice:

Physical state, solid.

1 percent solution in chloroform, complete and clear.

Melting range (decomposition), 207 °C to 212 °C (corrected).

Loss on drying, not more than 0.2 percent.

Residue on ignition, not more than 0.2 percent.

Total carotenoids other than trans-canthaxanthin, not more than 5 percent.

Lead, not more than 10 parts per million.

Arsenic, not more than 3 parts per million.

Mercury, not more than 1 part per million.

Assay, 96 to 101 percent.

(c) Use and restrictions.

- (1) The color additive canthaxanthin may be safely used for coloring foods generally subject to the following restrictions:
 - (i) The quantity of canthaxanthin does not exceed 30 milligrams per pound of solid or semisolid food or per pint of liquid food; and



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(ii) It may not be used to color foods for which standards of identity have been promulgated under section 401 of the Federal Food, Drug, and Cosmetic Act unless added color is authorized by such standards.

(2) Canthaxanthin may be safely used in broiler chicken feed to enhance the yellow color of broiler chicken skin in accordance with the following conditions: The quantity of canthaxanthin incorporated in the feed shall not exceed 4.41 milligrams per kilogram (4 grams per ton) of complete feed to supplement other known sources of xanthophyll and associated carotenoids to accomplish the intended effect.

(3) Canthaxanthin may be safely used in the feed of salmonid fish in accordance with the following prescribed conditions:

(i) Canthaxanthin may be added to the fish feed only in the form of a stabilized color additive mixture;

(ii) The color additive is used to enhance the pink to orange-red color of the flesh of salmonid fish; and

(iii) The quantity of color additive in feed shall not exceed 80 milligrams per kilogram (72 grams per ton) of finished feed.

(d) Labeling requirements.

(1) The labeling of the color additive and any mixture prepared therefrom intended solely or in part for coloring purposes shall conform to the requirements of 21 CFR 70.25.

(2) For purposes of coloring fish, the labeling of the color additive and any premixes prepared therefrom shall bear expiration dates (established through generally accepted stability testing methods) for the sealed and open container, other information required by 21 CFR 70.25, and adequate directions to prepare a final product complying with the limitations prescribed in paragraph (c)(3) of this definition.

(3) The presence of the color additive in feed prepared according to paragraph (c) of this definition shall be declared in accordance with 21 CFR 501.4.

(4) The presence of the color additive in salmonid fish that have been fed feeds containing canthaxanthin shall be declared in accordance with 21 CFR 101.22(b), (c), and (k)(2), and 101.100(a)(2).

(e) Exemption from certification.

Certification of this color additive is not necessary for the protection of the public health, and therefore batches thereof are exempt from the certification requirements of section 721(c) of the Federal Food, Drug, and Cosmetic Act.

21 CFR 73.75 (adopted 2017 rev 1)

93.5 Wheat Middlings consists of fine particles of wheat bran, wheat shorts, wheat germ, wheat flour, and some of the offal from the “tail of the mill”. This product must be obtained in the usual process of commercial milling and must contain not more than **9.5%-11%** crude fiber. (Proposed 1959, Adopted 1960, Revised 2017 rev 1)

T96.14 Scheffersomyces stipitis Dried Yeast is the dried, non-viable yeast of the botanical classification *Scheffersomyces stipitis* that has been grown on thin stillage from



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the ethanol production process from the fermentation of a grain or grain mixture, and is separated by centrifugation from the media on which it was propagated. The product is produced in accordance with good manufacturing practices to control the potential for mycotoxin and other contaminants. The product is intended as a source of protein in cattle, sheep, goat, and swine feeds at levels up to 15%. It must contain not less than 40% crude protein. The label shall include guarantees from minimum crude protein and crude fat and maximum sulfur contents. Non-protein nitrogen content must be guaranteed when added. (Proposed 2017 rev 1)

New OP section:

101. GRAS NOTIFIED SUBSTANCES INTENDED for ANIMAL FOOD

Section Editor: xxxxx

The following is a list of GRAS Notices filed voluntarily by the notifiers pursuant to 21 CFR 570.205 which FDA has evaluated (21 CFR 570.265) and determined that it had no questions regarding the conclusion that the notified animal food substance is generally recognized as safe (GRAS) under the intended conditions of use. The filed notice and the FDA response letter provide information (identity, manufacture, specifications, intended effect, and safety) on the substance under the intended use conditions, and the most up to date version is posted at the following website:

[<http://www.fda.gov/AnimalVeterinary/Products/AnimalFoodFeeds/GenerallyRecognizeasSafeGRASNotifications/ucm243845.htm>] This section is provided as a convenience for the State Feed Control Officials.

While the information on the substance and the intended use is specific to that provided by the notifier, other firms may use information within the notice along with other data specific to their substance to support the GRAS conclusion (see 21 CFR 570.3-570.280). Such other firms who conclude that an animal food substance is GRAS under the conditions of its intended use by relying on a posted GRAS notice submitted by another person shall carefully evaluate whether their production process, product specifications and intended conditions of use, fall within the parameters addressed by the referenced GRAS notice. GRAS conclusions are not legally required to be submitted to FDA, but may be voluntarily submitted in accordance with the GRAS Notice regulation (21 CFR Part 570. 205). Nevertheless, firms that elect to make use of the GRAS provision must document their GRAS conclusions prior to marketing a substance for a particular intended use. State Feed Control Officials may request the GRAS Conclusion to support their registration or inspection duties.

The below table is adapted from the FDA Animal GRAS Notification website and includes ingredient definition information (substance, common and usual name (from the FDA response letter), and intended use (including use limitations, if any)). For other



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information, see the FDA response letter for the GRAS Notice (available at link provided above).

At each AAFCO IDC meeting, the section editor will provide an updated list of animal food GRAS Notices that have been evaluated by the FDA and have received a no questions letter from the Agency. Firms making GRAS conclusions should be prepared to answer questions from the Ingredient Definitions Committee or Association if needed. The listed notices below have been voted on by the Ingredient Definitions Committee and accepted by the Association for publication in the AAFCO Official Publication.

Table 101.1 GRAS Notified Substances with no questions letters from FDA

AGRN	Notifier	Substance	Common and Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter