

Ingredient Definitions Committee Meeting Report

AAFCO March 4, 2020 e-Meeting

Recommendations to the Board and Association membership:

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

- 1) Publish as Official with an effective date 2 years after membership acceptance vote: **73.052 Sodium aluminosilicate** is hydrated sodium aluminum silicate having $\text{Na}_2\text{O}:\text{Al}_2\text{O}_3:\text{SiO}_2$ in molar ratios of approximately 1:1:13, respectively. It can be naturally occurring **or synthetic**. It consists of 66.0 to 76.0% silicon dioxide; 9.0 to 13.0% aluminum oxide; and 4.0 to 7.0% sodium oxide, on a dry basis. It is used as an anticaking agent not to exceed 2% in finished feed. 21 CFR 582.2727. (Implement on x/xx/20xx).

Board Action:

To be considered in May 2020

Association Action:

To be considered in August 2020

Recommendations not needing further Association review

- 1) Delete (editorial) the entry in table 73.001 (page 432 2019 rev 10P) in section 73, Technical Additives, for sodium silicoaluminate. To be implemented 2 years after the association acceptance of 73.052 Sodium aluminosilicate. **ODI to list both names until that time.**
- 2) Place an editorial note in the OP committee lists that Tom Phillips is the liaison between IDC and PTP committees.



Minutes

Documents supporting the agenda are posted in the BIN library / Ingredient Definitions / Investigator Recommendations -or- contact the person listed on the agenda with questions.

1) Roll call of Committee members. 19/24 Quorum was present

Richard Ten Eyck, Erin Bubb, Mika Alewynse, Ken Bowers, Stan Cook, Dave Dressler, James Embry, Maggie Faba, Ashlee-Rose Ferguson, Jacob Fleig, Brett Groves, Darrell Johnson, Ali Kashani, Melanie Marquez, Dave Phillips, Tom Phillips, Nathan Price, Kelli Younker, Charlotte Conway, Jennifer Kormos -proxy for Laura Scott.

Missing: Kent Kitade, George Ferguson, Dan King, Mark LeBlanc, Madison Starnes, Laura Scott, Shannon Jordre,

2) Minutes of the January IDC minutes as posted in the BIN were approved by voice vote. Brett Groves moved, Dave Dressler seconded.

3) ODI subcommittee report. Jacob Fleig. Subcommittee to establish a process to get ingredient definitions into the master list for the ODI tool. Subcommittee is just starting and has not met. Currently changes are vetted by Jacob checking with the IDC chair and the Investigator for the section to concur.

4) **73.052 Sodium Aluminosilicate** as an anticaking agent. Add to the OP as Official (CFR) Richard Ten Eyck. During the January meeting Shannon Jordre made the motion to add these changes including the synthetic form; David Dressler seconded.

- i) Topic was tabled during the last IDC meeting in January 2020.
- ii) Motion to take from the table was made by Mika Alewynse and seconded by Ali Kashani. Motion passed.
- iii) Mika Proposed a friendly amendment, Maggie Faba seconded, to set a 2 year phase in period from association membership acceptance vote for the nomenclature change. Amendment passes
- iv) Original Motion as amended to publish as Official in the OP with an implementation date 2 years after association acceptance was put to a voice vote. **Motion passed.**



Final, IDC accepted 4/8/2020

Discussion continued from January IDC meeting. Mika Alewynse, CVM addressed the questions.

- Identity of chemical makeup– A file search showed that this description is consistent back several decades
- EU name – Using Sodium Aluminum Silicate for the same material.
- Organic certification – needs to be addressed by AMS at USDA.

Kristi Smedley is concerned that the Federal regulations allow the use of 2 different names. Mika disagreed that the parenthetical listing is a second name.

Last meeting discussion:

According to Mika Alewynse, FDA agreed that the synthetic form was safe for the intended use some time ago, but not bringing it to the committee was an oversight. Leah Wilkinson clarified that both names of this additive are used commercially, are used in the AAFCO OP and provided as GRAS substances in the CFR (21 CFR 582), used internationally, and in organic-certifications (OMRI). AFIA further questioned why the detailed FCC specifications are included in this ingredient and not in other anti-caking agents. She also noted that the FCC specifications differ from the EU specifications.

Mika Alewynse said that a phase in period could be allowed for the different names (precedent is the reclassification changes for the direct-fed microorganisms). A single common or usual name is preferred rather than having multiple names to avoid user confusion. Ingredient definitions, such as that for selenium, can differ from the Code of Federal Regulations. Until January 2018, the Division had objected to synthetic sources.

IDC Approved language:

73.052 Sodium aluminosilicate is hydrated sodium aluminum silicate having $\text{Na}_2\text{O}:\text{Al}_2\text{O}_3:\text{SiO}_2$ in molar ratios of approximately 1:1:13, respectively. It can be naturally occurring or synthetic. It consists of 66.0 to 76.0% silicon dioxide; 9.0 to 13.0% aluminum oxide; and 4.0 to 7.0% sodium oxide, on a dry basis. It is used as an anticaking agent not to exceed 2% in finished feed. 21 CFR 582.2727. (Implement on x/xx/20xx).

- 5) Delete (editorial) the entry in table 73.001 (page 432 2019 rev 10P) in section 73, Technical Additives, for sodium silicoaluminate be deleted to avoid confusion when the definition for sodium aluminosilicate is accepted by the AAFCO membership. Sodium silicoaluminate is an older name for sodium aluminosilicate. – Richard Ten Eyck



Final, IDC accepted 4/8/2020

Mika Alewynse moved, Maggie Faba seconded, To delete sodium silicoaluminate from table 73.001 with a 2 year implementation date in concert with 73.052.

Motion passed

There was discussion that this deletion was really what needed the 2 year implementation but the committee did not go back and change the previous action.

- 6) Animal Products investigator has been changed to Stan Cook. He is working on meat & poultry products definitions. Please contact Stan if you know of other changes in the category that have not been brought to IDC. Stan will post pending topics in the BIN as he gathers them.

The Fats and Oils section is temporarily with Richard Ten Eyck.

- 7) The Board of Directors has asked IDC to plan and execute a workshop at the Omaha AAFCO Annual meeting in August 2021 on Developing Ingredient Definition submission requests. Volunteers Include: Meagan Davis, AFIA; _____ CVM; Betty Mcphee; Kristi Smedley; Lindsey Meyers; _____ IDC; ETC Liaison is _____

Chair to provide a BIN Team and a workgroup charge.

- 8) (agenda 7) Proficiency Testing program would like a liaison on IDC to keep aware of evolving topics. Tom Phillips will take a stab at it. Erin Bubb needs to verify that he becomes a member on both committees. Place a note in the OP.
- 9) (agenda 8) ICG workgroup report – no action since the survey came from strategic affairs in January.
- 10) (agenda 9) Not defined workgroup report – No action since midyear. There is a report of their December call that has yet to come to IDC.
- 11) MSBC Workgroup report
Tom Phillips and Charlotte Conway related that additional work could be done in a GRAS Notice pathway if newly published data (post 1992) was brought forward on additional species. Extensive discussion ensued with no conclusions. The workgroup will continue to discuss and work on the topic.
- 12) GRAS Notice Training Baltimore 8/5/2020- workgroup update—Dave Edwards
GRAS Notice Training workgroup will be getting together to build out the content.



Final, IDC accepted 4/8/2020

Charge: Develop and deliver a public workshop on submitting GRAS notifications to FDA on feed ingredients.

- a) Lead – Dave Edwards
- b) Team: (CVM), Nathan Price, Leah Wilkinson (AFIA), Kristi Smedley, Chris Cowell (PFI), Emily Helmes (ETA), Jan Campbell (NGFA), Meagan Davis
- ETC Liaison: George Ferguson, NC

13) AAFCO Investigator Training - Baltimore 8/4/2020 workgroup update - Charlotte Conway. *Working on forms and budgets. Melanie Marquez would like to help.*

Charge: Using materials from the last investigator workshop develop and deliver regulator-only training for the AAFCO ingredient investigators.

- c) Lead – Charlotte Conway
- d) Team – Richard, Kent, Ali,
- e) ETC Liaison: Kate Nelson, CT

14) NANP subcommittee report. – No report, group still being formed.

15) 90.25 Update to vitamin table 90.25– MSBC intended uses – Tom Phillips – *Postponed discussion*

16) 90.27 (NEW Table) Pet food parenthetical Vitamin name table (workgroup update with possible action item) --- Tom Phillips *No Action taken, deal with at the Next IDC meeting.*

17) Next Meeting: August 7, 2020, Baltimore Proposing (2) 90 minute sessions.

Minutes accepted 4/8/2020 not voting: Ken Bowers, Kelli younker, Dan King, Mark LeBlanc, Madison Starnes,