



Association of American Feed Control Officials

**2018 AAFCO Midyear Meeting
Committee Reports**



January 21–25, 2018

**Hyatt Regency Orange County
Garden Grove (Anaheim), CA**



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Association Business Meeting Minutes

2017 AAFCO Annual Meeting

August 10, 2017, 9:15 am – 9:39 am, Bellevue, Washington

- 1) Ken Bowers convened business session of the Association at 9:15 am
- 2) Stan Cook states the AAFCO Board of Directors approved the following Committee Reports: Current Issues and Outreach, Education and Training, Feed and Feed Ingredient Manufacturing, Feed Labeling, Ingredient Definitions, Ingredient Definitions Committee eMeeting Report March 10, Inspection and Sampling, Laboratory Methods and Services, Model Bills and Regulations, Pet Food, Pet Food eMeeting April 24, Proficiency Testing Program and Strategic Affairs and recommends the same to the membership. I so move. **Bob Geiger Seconds. MOTION CARRIES**

- 3) **Acceptance of Committee Recommendations:** –Stan Cook, President-Elect
Ingredient Definitions 1-7 & eMeeting March 10, 1-12:
Report starts on page 21 of the Committee Report Book

- 1) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the new Section 101 header including the introductory paragraphs and the table header row of the new GRAS notice table in the Official Publication.

101. GRAS NOTIFIED SUBSTANCES INTENDED FOR ANIMAL FOOD

Section Editor: Nathan Price, ID

The following is a list of GRAS Notices filed voluntarily by the notifiers pursuant to 21 CFR 570.205 which the 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/GenerallyRecognizedAsSafeGRASNotifications/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 the 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 information, see the FDA response letter for the GRAS Notice (available at link provided above).

Table 101.1 GRAS Notified Substances with no questions letters from the FDA.

AGRN	Notifier	Substance	Common and Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter
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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*. and recommends the same to the membership. I so move. **Mark LeBlanc Seconds.**

MOTION CARRIES, 1 opposed

- 2) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish a new microorganism to the list in Definition T36.14 Direct-Fed Microorganisms: *Bacillus amyloliquefaciens* and recommends the same to the membership. I so move. **Bob Geiger Seconds. MOTION CARRIES**
- 3) 3rd recommendation from the IDC to Publish the following definitions as Official in the AAFCO Official Publication:
 - A) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish 3.5 Direct Dehydrated Alfalfa Meal or Pellet as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Dave Phillips Seconds. MOTION CARRIES, 1 opposed**
 - i) 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, that has not been stored in bales or in stacks as sun-cured alfalfa hay prior to being ground and dried and recommends the same to the membership. I so move. by thermal means under controlled conditions. (Proposed 2016 rev. 1)
 - B) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish 87.20 Guanidinoacetic acid as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Dave Dressler Seconds. MOTION CARRIES**
 - i) 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% of the complete feed.
 - (c) The additive consists of not less than 97% guanidinoacetic acid [N-(aminoiminomethyl)-glycine] (CAS 352-97-6) by weight.
 - (d) The additive meets the following specifications:
 - (1) Dicyandiamide not to exceed 0.5%;
 - (2) Cyanamide not to exceed 0.01%;
 - (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%.
 - (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% of the complete feed for broiler chickens and turkeys; and
 - (ii) Adequate directions for use.
 - C) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish 87.115 Canthaxanthin as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Dave Dressler Seconds. MOTION CARRIES**

21 CFR 573.496 (Adopted 2017 rev. 1)

- i) 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% solution in chloroform, complete and clear.
 - Melting range (decomposition), 207 to 212°C (corrected).
 - Loss on drying, not more than 0.2%.
 - Residue on ignition, not more than 0.2%.
 - Total carotenoids other than trans-canthaxanthin, not more than 5%.
 - 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%.
 - (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
 - (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)
- D) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish T60.115 (B) Pulse protein as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Dave Dressler Seconds.**

MOTION CARRIES

- i) T60.115 (B) Pulse protein: is the protein fraction of pulse seeds. It is obtained from mechanically dehulled, dry milled pulse seeds that are further separated through air classification or the addition of water, acid, and alkali. The ingredient may be obtained from pulse seed separated by dry separation, wet separation, or both. Pulse crops include the edible seeds of legumes (excluding oil seeds). Acceptable pulse crops are listed below. The ingredient must contain not less than 53% crude protein on a dry matter basis, and a label shall include a guarantee for minimum crude protein. If a conditioning agent is used, the name of the conditioning agent must be shown as an added ingredient. If the ingredient bears a name descriptive of its kind or origin, it must correspond thereto.
(Proposed 2016 rev. 1)
Accepted pulse crops:
Lentil (*Lens culinaris*)
IFN 05-17-726 Pea (*Pisum sativum* L.)
- E) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish T60.116 (B) Pulse starch as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Dave Phillips Seconds.**

MOTION CARRIES

- i) T60.116 (B) Pulse starch: is the fraction remaining after removal of protein and fiber from pulse seeds. It is obtained from mechanically dehulled, dry milled pulse seeds that are further separated through air classification or through the addition of water. The ingredient may be obtained from pulse seed separated by dry separation, wet separation, or both. Pulse crops include the edible seeds of legumes (excluding oil seeds). Acceptable pulse crops are listed below. The product must contain not less than 65% dietary starch on a dry matter basis, and the label shall include a guarantee for minimum dietary starch. If a conditioning agent is used, the name of the conditioning agent must be shown on the product label as an added ingredient. If the ingredient bears a name descriptive of its kind or origin, it must correspond thereto. (Proposed 2016 rev. 1)
Accepted pulse crops:
Lentil (*Lens culinaris*)
IFN 05-17-726 Pea (*Pisum sativum* L.)
- F) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish T33.21 Yellow Grease, Feed Grade as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Mark LeBlanc Seconds. MOTION CARRIES**
- i) T33.21 Yellow Grease, Feed Grade, is the rendered product from the tissues of mammals and/or poultry blended with used cooking or frying oil from human food preparation, consisting of animal and/or vegetable fats or oils. It must contain, and be guaranteed for, not less than 90% total fatty acids, not more than 2.5%

unsaponifiable matter, not more than 0.5% insoluble impurities, and not more than 1% moisture. Maximum free fatty acids must also be guaranteed. This product may not include recovered trap grease or material recovered from sanitary sewer sources. If an antioxidant(s) is used, the common name or names must be indicated, followed by the words "used as a preservative." If the product contains tallow (from cattle) containing greater than 0.15% insoluble impurities, then it must be labeled with the BSE caution statement "do not feed to cattle or other ruminants." (Proposed 2017)

- G) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish T33.24 Used Cooking Oil, Feed Grade as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Dave Phillips Seconds. MOTION CARRIES**
- i) T33.24 Used Cooking Oil, Feed Grade: is the product of used cooking or frying oil from human food preparation, consisting of animal and/or vegetable fats or oils, collected from commercial human food facilities and then heated to reduce moisture. It must contain, and be guaranteed for, not less than 90% total fatty acids, not more than 1% unsaponifiable matter, not more than 0.5% insoluble impurities, and not more than 1% moisture. Maximum free fatty acids must also be guaranteed. This product may not include recovered trap grease or material recovered from sanitary sewer sources. If an antioxidant(s) is used, the common name or names must be indicated, followed by the words "used as a preservative." (Proposed 2017)
- 4) 4th recommendation from IDC to publish the following new definitions as tentative in the Official Publication:
- A) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish T96.14 *Scheffersomyces stipitis* Dried Yeast as a new definition in tentative status in the AAFCO Official Publication. And recommends the same to the membership. I so move. **Dave Phillips Seconds. MOTION CARRIES**
- i) 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 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)
- B) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to publish T71.35 *Brassica carinata*, solvent extracted as a new definition in tentative status in the AAFCO Official Publication. And recommends the same to the membership. I so move. **Bob Church Seconds. MOTION CARRIES**
- i) T71.35 *Brassica carinata*, solvent extracted, is the meal obtained after the removal of most of the oil by solvent extraction of *Brassica carinata* seeds. The meal shall contain less than 2.0% erucic acid and less than 30 micromoles of total glucosinolates per gram. It is a source of protein for beef cattle in an amount not to exceed 10% of the total diet. The maximum sulfur content must be guaranteed.
- 5) 5th recommendation from the IDC to delete the following item from the Official Publication:
- A) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to delete Canthaxanthin from Table 87.5 in the AAFCO Official Publication- **if** 87.115 is added. And recommends the same to the membership. I so move. **Wayne Nelson Seconds. MOTION CARRIES**
- 6) 6th recommendation from the IDC to publish the following in Table 101.1 in the new section 101 GRAS Notices in the AAFCO Official Publication:

- A) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to add Hydrophobic silica AGRN 5 to Table 101.1 in the new section 101 GRAS Notices in the AAFCO Official Publication. And recommends the same to the membership. I so move. **Bob Geiger Seconds. MOTION CARRIES**

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)
5 (PDF, 67 pages)	Emerald Carolina Chemicals LLC	Hydrophobic silica	Hydrophobic silica	As a defoaming component of a defoamer used in the removal of oil from condensed distillers solubles, at levels up to 20 ppm	Beef cattle, dairy cattle, poultry (turkey, broiler chickens, and egg laying hens), sheep, goats, and swine	May 12, 2011	FDA has no questions. (PDF, 3 pages)

- B) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to add Polyethylene glycol (400) dioleate AGRN 6 to Table 101.1 in the new section 101 GRAS Notices in the AAFCO Official Publication. And recommends the same to the membership. I so move. **Mark LeBlanc Seconds. MOTION CARRIES**

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)
6 (PDF, 57 pages)	Emerald Carolina Chemicals LLC	Polyethylene glycol (400) dioleate	Polyethylene glycol (400) dioleate	As an emulsifier component of a defoamer used in the removal of oil from condensed distillers, at levels up to 64 ppm	Beef cattle, dairy cattle, poultry (turkey, broiler chickens, and egg laying hens), sheep, goats, and swine	May 12, 2011	FDA has no questions. (PDF, 3 pages)

- C) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to add Polysorbate 60 AGRN 7 to Table 101.1 in the new section 101 GRAS Notices in the AAFCO Official Publication. And recommends the same to the membership. I so move. **Jacob Flieg Seconds. MOTION CARRIES**

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)
7 (PDF, 101 pages)	Emerald Carolina Chemicals LLC	Polyoxyethylene (20) sorbitan monostearate (polysorbate 60)	Polysorbate 60	As an emulsifier component of a defoamer used in the removal of oil from condensed distillers solubles, at levels up to 20 ppm	Beef cattle, dairy cattle, poultry (turkey, broiler chickens, and egg laying hens), sheep, goats, and swine	May 12, 2011	FDA has no questions. (PDF, 3 pages)

- D) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to add Phytase AGRN 14 to Table 101.1 in the new section 101 GRAS Notices in the AAFCO Official Publication. And recommends the same to the membership. I so move.
Dave Dressler Seconds. MOTION CARRIES

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)
14 (PDF, 576 pages)	DSM Nutritional Products	Phytase enzyme produced by an <i>Aspergillus oryzae</i> strain expressing a synthetic gene coding for a 6- phytase from <i>Citrobacter braakii</i>	Phytase	To increase the digestibility of phytin-bound phosphorous or to increase phosphorous availability from phytate in poultry diets when fed at the rate of 250– 4000 FYT/kg feed	Poultry (turkey, broiler chickens, and egg laying hens)	Nov. 14, 2012	FDA has no questions. (PDF, 3 pages)

- E) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to add Phytase AGRN 15 to Table 101.1 in the new section 101 GRAS Notices in the AAFCO Official Publication. And recommends the same to the membership. I so move.
Dave Phillips Seconds. MOTION CARRIES

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)
15 (PDF, 505 pages)	DSM Nutritional Products	Phytase enzyme produced by an <i>Aspergillus oryzae</i> strain expressing a synthetic gene coding for a 6-phytase from <i>Citrobacter braakii</i>	Phytase	To increase the digestibility of phytin-bound phosphorous or to increase phosphorous availability from phytate in swine diets when fed at the rate of 500–4000 FYT/kg feed	Swine	Aug. 8, 2013	FDA has no questions. (PDF, 3 pages)

- F) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to add L-Methionine 85% AGRN 16 to Table 101.1 in the new section 101 GRAS Notices in the AAFCO Official Publication. And recommends the same to the membership. I so move **Dave Phillips Seconds. MOTION CARRIES**

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)
16 (PDF, 87 pages)	Metabolic Explorer	L-methionine 85% produced by a bioengineered <i>Escherichia coli</i> K-12	L-methionine 85%	Nutrient at levels up to 0.3% in animal feed	All animals	Jan. 3, 2014	FDA has no questions. (PDF, 4 pages)

- G) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the IDC to add Canthaxanthin AGRN 17 to Table 101.1 in the new section 101 GRAS Notices in the AAFCO Official Publication. And recommends the same to the membership. I so move **Dave Phillips Seconds. MOTION CARRIES**

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)
17 (PDF, 170 pages)	DSM Nutritional Products	Canthaxanthin	Canthaxanthin	To be used in breeder hen diets at the rate of 6 mg/kg of feed as a nutritive antioxidant to support the development of chicks	Breeder hens used for hatching egg production	Jul. 22, 2014	FDA has no questions. (PDF, 4 pages)

Model Bills 1-2:

Report starts on page 47 of the Committee Report Book

- 1) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the Model Bill and Regulations Committee recommends that the following Veterinary Feed Directive language be included into the Model Regulations Under the Model Bill and that the AAFCO Board of Directors review the proposed language for future consideration by the Association membership pending review by Dragan Momcilovic, FDA (Attachment D).

Regulation 13. Veterinary Feed Directive

- (a) For the purposes of enforcement of Section 10(a)(2) of the Act the _____ adopts the definitions of Title 21, Code of Federal Regulations, Section 558.3(b)
- (b) For the purposes of enforcement of Section 10(a)(2) of the Act the _____ adopts the requirements of Title 21, Code of Federal Regulations, Section 558.6

And recommends the same to the membership. I so move. **Dave Phillips Seconds.**

MOTION CARRIES

- 2) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the Model Bill and Regulations Committee recommends that the term “feed” be revised within the AAFCO Non-Commercial Feed Model Bill [Section 3. Definitions of Words and Terms. (e)] to conform with modifications adopted to the Official Feed Term by the AAFCO membership on January 16, 2017, and that the AAFCO Board of Directors review the proposed revision for future consideration by the Association membership. The modified language for the Official Feed Term adopted by the AAFCO membership is as follows:

Feed. Material consumed or intended to be consumed by animals other than humans that contributes nutrition, taste, aroma, or has a technical effect on the consumed material. This includes raw materials, ingredients, and finished product.

And recommends the same to the membership. I so move. **Wayne Nelson Seconds.**

MOTION CARRIES

Pet Food Committee 1:

Report starts on page 63 of the Committee Report Book

- 1) Stan Cook states the AAFCO Board of Directors accepted the recommendation from the Pet Food Committee recommends acceptance of the Guidelines for Dental Related Claims intended to replace the Guidelines for Tartar Control Claims found on page 147 of the 2017 Official Publication. And recommends the same to the membership. I so move.

Guidelines for Dental Related Claims

The Pet Food Committee recommends for consideration to the Board of Directors that the guidelines displayed below replace the Guidelines for Tartar Control Claims found on page 147 in the 2017 OP.

Guidelines for Dental Related Claims

The AAFCO Pet Food Committee supports and recommends the following guidelines for tartar and plaque control with respect to pet food products (including snacks and treats), rawhides, and other chews.

- (1) Foods bearing dental related claims (claims to cleanse or whiten teeth or freshen breath) by virtue of their abrasive or mechanical actions are not objectionable.
- (2) Foods bearing dental related claims for plaque or tartar reduction or prevention, or control of bad breath odor, may be misbranded. However, if these claims are made only with respect to the products' abrasive action or masking flavor, enforcement would be a low priority.
- (3) Foods bearing expressed or implied drug claims to prevent or treat dental diseases (e.g., gingivitis, gum problems, tooth loss) are not permissible unless they are the subject of approved New Animal Drug Applications.
- (4) Food ingredients that are not GRAS (generally recognized as safe) for the intended purpose of affecting the teeth or gums may be unapproved food additives or unapproved drugs, depending on the nature of the claim.
- (5) Foods bearing claims for plaque or tartar reduction, prevention, or control of bad breath odor that achieve their effect, in part or in total, by means other than

mechanical action or masking flavor must have an approved New Animal Drug Application or a letter of favorable review from the FDA prior to being marketed.

- (6) The labels of foods bearing dental related claims must state the method(s) or mechanism(s) by which the intended effects are achieved, such as, but not limited to: with ridges to help scrape teeth, coated with a unique ingredient to help prevent tartar buildup, with peppermint to help freshen breath.

4) **Nomination Committee**

The Nominating Committee recommends the following slate for Board of Directors to take office January 1, 2018.

President: Stan Cook (MO)
President-elect: Robert Geiger (IN)
Secretary-Treasurer: Ali Kashani (WA)
Sr. Director: Kristen Green (KY)
Sr. Director: Erin Bubb (PA)
Jr. Director: Dave Phillips (ND)
Jr. Director: Bob Church (MT)
Jr. Director: George Ferguson (NC)
Immediate past President: Ken Bowers (KS)

Mark LeBlanc Seconds. MOTION CARRIES

This concludes committee recommendations needing membership approval.

Ken Bowers adjourned Business Meeting at 9:39 am

- 5) Credential Report – FASS
Number of Voting Members Represented 41
Number of States in attendance 44
Number of Countries 9
Number of FDA Representatives 27
Number of Life Members 4
Total Meeting Attendance 404

Minutes approved 9/13/17

Current Issues and Outreach Committee Report

2017 Annual Meeting

August 10, 2017, 9:30 am – 10:30 am, Bellevue, Washington

Committee Recommendations: None

Board Recommendations: Report approved October 25, 2017

Association Recommendations: None

Committee Participants:

Members Present: Liz Higgins (Vice-Chair), Meagan Davis, Chad Linton, Tim Darden, Tim Lyons, Kent Kitade, Richard Ten Eyck, and Ali Kashani (Committee Chair)

Advisors Present: Leah Wilkinson, Angela Mills, David Dzanis, David Fairfield, David Meeker, Angele Thompson

Committee Report

The meeting was called to order at 9:30 am PST by Ali Kashani (Chair) who made opening remarks. He announced that Liz Higgins agreed to serve as Vice-Chair of the committee.

Liz Higgins gave an update on the AAFCO newsletter (AAFCO News Feed). The second volume of the AAFCO News Feed was sent out to AAFCO members and posted on the AAFCO website on June 30, 2017. Feedback is appreciated to let the committee know what people are interested in and if the newsletter is providing the information that members and industry want to see.

By-Products from Human Food Processing Plants

Jamie Wiggins, Director of Food Safety and Policy for the Northwest Food Processing Association gave a presentation on Human Food By-products for Animal Food related to FSMA Animal Food Rules from a Fruit & Vegetable Processor's Perspective. Ms. Wiggins noted that approximately 73% of human food waste (over 42 million tons) is currently recycled through animal feed. By some extrapolated estimates, approximately 16% (15,000,000 tons) of the above amount may not be recycled due to new regulations and mentioned possible alternatives. A copy of Ms. Wiggins PowerPoint presentation is attached.

Inspection Findings Under cGMP/FSMA

Ms. Dianne Milazzo, Consumer Safety Officer with Office of Surveillance & Compliance, FDA/CVM, moderated a round table discussion on inspectional findings under CGMP/FSMA participated by Sean Cheney, FDA/Office of Regulatory Affairs/Dallas District, Doug Lueders, MN Department of Agriculture, and David Fairfield, National Grain and Feed Association.

Mr. Sean Cheney gave a perspective on inspections conducted by FDA. There have been 145 FSMA cGMP inspections completed to date [139 NAI (No Action Indicated), 6 VAI (Voluntary Action Indicated; FDA 483 issued)]. The top reasons for investigators issuing a 483 are pest control issues and product contamination (i.e., plastic). Investigators have, for the most part, been discussing observations rather than issuing FDA-483s (i.e., for violations that did not raise to a level of a human or animal health safety concern). The majority of inspections have been conducted in the following states: CA, IL, IA, NY and MO (in no particular order). The feedback provided from investigators is that firms have been cooperative and patient with investigators during inspections.

Mr. David Fairfield, Senior Vice President for the National Grain and Feed Association, provided an industry perspective on the initial inspections that have been performed by FDA and state feed regulatory officials to evaluate compliance with CGMP requirements established by preventive controls animal food rule.

Mr. Fairfield noted that industry's experience with the inspections generally has been positive, and commended FDA and state officials for their "educate before and while we regulate" approach. Regarding education, Fairfield also asked that FDA publish final CGMP guidance and draft preventive controls guidance as soon as possible to better inform the industry of the agency's compliance expectations associated with the new animal food rule.

Mr. Fairfield also urged FDA to continue in its efforts to ensure that investigators during inspections have expectations that are realistic for the facility, consistent with the new requirements, and uniformly applied. He also noted that investigator requests for information that are not consistent with regulatory provisions can create tension during the inspection, and ultimately hinder the exchange of information and collaboration that FDA is seeking with the regulated industry. He requested that FDA consider this issue when implementing its inspectional approach.

Mr. Doug Lueders with Minnesota Department of Agriculture gave a state perspective on conducting the new 507 CGMP inspections. Minnesota was one of five states contracted with FDA to do feed CGMP inspections in 2017. Mr. Lueders indicated that all inspectors that conduct FDA CGMP contract inspections have to go thru specific FDA 507 CGMP regulator training in order to do the inspections. Inspectors encouraged dialog with the facility's team throughout the inspection. The statement was made that some facilities that have not previously been inspected by FDA may have some discomfort sharing information regarding their total annual dollars of sales and other business information. MDA inspectors did not get any pushback related to these business questions. One area that had quite a few questions was utensils. Industry also had a number of situational questions that would have been easier to address if a FDA guidance document had been available.

Ms. Dianne Milazzo indicated that investigators use the Investigations Operations Manual (IOM) to tell them what procedures they are to perform during inspections. The IOM does direct staff to ask the firm about customer complaint files. Inspectors have been instructed to request to view complaint files and will put this into their reports. Firms are not required to provide this information under any regulatory authority. Customer complaints are also reported to FDA. Inspectors will have reviewed that information prior to conducting an inspection and will follow up on the complaint while conducting the inspection. Ms. Milazzo noted that there is still FSPCA money available for training of the states' staff and there has been an extension to apply for this grant money until June 2018. She also indicated that Canada, Australia and New Zealand have been assessed and recognized that their systems are equivalent for human food, however, currently there are not any countries' systems recognized to meet the requirements for animal food.

The meeting adjourned at 10:30 am.

Education and Training Committee Report
2017 AAFCO Annual Meeting
August 12, 2017, 8:00 am – 10:00 am, Bellevue, Washington

Committee Recommendations: None

Board Recommendations: Report approved on October 25, 2017

Membership Recommendations:

Committee Action Items

- 1) Approval of Training Documents
- 2) Model Training Plan Development
- 3) AITS/BITS on Feed BIN

Committee Participants

Members Present: Tim Lyons – MI; Amanda Anderson - KS; Meagan Davis – LA; Jacob Fleig – MO; David Dressler – PA; Becky Hostetler – CO; Liz Beckman – WA; Samantha Moran – CA; Cat Marrier – WA; George Ferguson – NC; Richard Ten Eyck – OR; Bob Geiger – IN; Jim True – KY; Darlene Krieger – CVM; Dave Edwards – CVM **Via Telephone:** Jim Fear – ORA

Advisors Present: Dave Fairfield – NGFA; Diane Loiselle – Hills

Others Present: Chris Weiss – IFPTI; Sue Brace – IFPTI

Committee Report

Tim Lyons called the meeting to order at 8:00 AM PST. Amanda Anderson was introduced as new Committee Co-Chair and the rest of the members and advisors in the room introduced themselves.

Presentation of National Feed Curriculum Training Modules – Chris Weiss, IFPTI

Chris Wise presented a demonstration of the “Animal Food and Ingredients” course. This course is 3 units long and participants must score a 70% on the exam to pass the course. IFPTI anticipates this course will be completed by the end of the year.

All 11 of the basic courses in the framework and being completed and should be done in the next 6 months.

IFPTI is looking for volunteers to help complete the rest of the curriculum, volunteers do not need to be feed supervisors but can be anyone with knowledge of feed programs. Tim Lyons

(lyonst1@michigan.gov) and Deirda Holloway (Deirdra.Holloway@fda.hhs.gov) are the main points of contact for the feed curriculum.

Jim Fear – FDA/CVM is working on processing the 25 feed general education courses. All courses will be available on FDA’s LMS Pathlore (<https://orauportal.fda.gov/stc/ORA/>). This should be completed in approximately 60 days.

In the first year the content is available FDA will accept comments for corrections or changes and then make changes as necessary. If changes are made to the AAFCO model bill or if regulations changes the courses can be updated as necessary.

The medicated feed, BSE and GMP course will all be going online as well.

cGMP Training Availability Update

FDA has announced 5 additional FSMA cGMP courses. There are two prerequisite courses required that must be taken prior to the cGMP Regulator Course (VM101 and VM 8001) both courses are on Pathlore (<https://orauportal.fda.gov/stc/ORA/>) and take approximately 15 hours to complete so participants should plan accordingly.

The Preventive Controls for Animal Foods training is still under development. The course will be posted on FDA’s website once it is available.

ETC Workgroups – Amanda Anderson and George Ferguson

The list of available trainings has been completed and categorized as basic or advanced. The lists need to be approved by the entire committee. It is estimated to take 90 days to complete these. The Inspection

and Sampling Committee has been charged with performing a GAP assessment to determine the relevance of each course. Estimated completion date for the entire process is June 2018. George Ferguson has a need among the AFRPS states for training personnel (3-4 people) to assist in developing a model training plan document for joint inspections on the job training forms for feed and deliver drafts to the committee at the January 2018 meeting.

AAFCO Training Updates – Meagan Davis

The BITS training will be held in Boise, Idaho October 24–26, 2017. Specifically related to feed, the BITS agenda covers GMPs, safety, biosecurity, professionalism, inspections, and sampling.

Standardizing AITS

The AITS agenda is formatted to cover core agenda topics; however, it varies a little depending on additional topics the host state would like to ensure are covered. Meagan Davis will work with the Inspection and Sampling Committee to ensure that it is understood that AITS is standardized.

AITS/BITS Folder Access on the Feed BIN

AITS and BITS folders on the BIN are currently only accessible to those that have paid access to the BIN and have attended the training. Meagan Davis is working to find a way to ensure that all attendees have access to the BIN to be able to pull past meeting information.

Action Item Table

Responsible	Item	Action	Timing / Status
Work Group	Training Documents	Approval of Basic and Advanced Training Documents developed by work group	November 2017
George Ferguson	Standard 2 forms	3-4 people to assist in developing model training plan document for joint inspections on the job training for feed.	January 2018
Unknown	AITS/BITS on Feed BIN	AITS/BITS Folders should be accessible on the Feed BIN	December 2017

Feed and Feed Ingredient Manufacturing Committee Report

2017 AAFCO Midyear Meeting
August 11, 2017, 8:00 am – 9:30 am, Bellevue, Washington

Committee Recommendations: None

Board Recommendations: Approved on November 13, 2017

Membership Recommendations: None

Committee Action Items:

- 1) Mineral Guidelines Working Group: Revise the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients”.
- 2) Emergency Response Working Group: Plan 2017 Tabletop Exercise. Work with Education and Training Committee and Jennifer Roland if necessary.
- 3) FSMA Implementation Task Force – Working Group 3
Create action plan to determine the processes of implementing the decision making and method development.
- 4) Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections:
Perform gap analysis of FSPCA training for inspectors to determine if AAFCO needs to provide additional training for state inspectors.

Committee Participants

Members Present: Eric Brady – TN (Co-Chair); Austin Therrell - SC (Co-Chair); Bob Church – MT; Wayne Nelson – CT; Ken Bowers – KS; Bob Geiger – IN; Dragan Momcilovic – FDA; Darlene Krieger – FDA; Tim Darden – NM; Laura Scott – Canada; Ali Kashani – WA; Doug Lueders - MN

Advisors Present: Matt Frederking – MAPF; Pat Tovey – PFI; David Meeker – National Renderers Association; Richard Sellers – AFIA; David Dzanis – APPA; David Fairfield - NGFA

Committee Report

Eric Brady called the meeting to order at 8:05 AM PST. Members and advisors in the room introduced themselves.

Introductions and Agenda Review—Eric Brady

Canadian Food Inspection Agency Update—Laura Scott

See Attachment A

Review of Action Items

Mineral Guidelines Working Group—Bill Burkholder

Working group has not yet finalized their revision of the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients”. However, Dr. Burkholder introduced Carissa Doody to the committee and explained that she would be moving the working group forward.

FSMA Implementation Task Force Updates

Working Group #3 – Contaminant and Hazard Lab Strategy—Bob Waltz/Mike Davidson

Working Group Charge: Following the identification of contaminants and hazards by FSPCA/FDA, the group will determine action levels and enforcement strategies to provide guidance to the Lab Methods and Services Committee (LMSC) in order to develop a priority list of method development. This Working Group will work in consultation with the FSPCA, Enforcement Issues Committee, Inspection & Sampling Committee, Ingredient Definition Committee and the LMSC

Bob Waltz provided guidance for progressing. At the current time the strategy is on-hold. Dr. Soloman, FDA/CVM expected to provide guidance on hazards in 2018. Once guidance has been provided the working group can move forward again.

Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections—Mike Davidson

Working Group Charge: Review materials developed by FSPCA and FDA to determine whether training material for feed ingredient manufacturing from the FSPCA will meet the needs of

Inspectors in regards to training. Working group will work in consultation with the Education & Training Committee and the Inspection & Sampling Committee

No update

Industry Updates

American Feed Industry Association (AFIA)—Richard Sellers

See attachment B

National Grain and Feed Association (NGFA)—Matt Frederking

Pet Food Institute (PFI)—Pat Tovey

In July 2016, PFI co-instructed in a Food Safety Preventive Controls Alliance combination training course along with staff from AFIA, NGFA and NRA. 75 lead instructors were issued certificates granting their status as lead instructors in the Animal Food Curriculum.

Pet Food Institute members developed a model Hazard Analysis for groups of ingredients typical for pet food use. This model is available on the PFI website for use by members.

In May 2016, PFI unveiled its new and updated webpage. The webpage contains material for PFI members as well as information for media or the general public.

Also, PFI recently sent an open letter to small pet food businesses as a reminder that we are approaching many of the Food Safety Modernization Act's compliance dates. The letter urges small manufacturers to reach out to the Food Safety Preventive Controls Alliance or PFI if any assistance is needed to comply with these rules under FSMA. A copy of the letter was shared with the AAFCO Board of Directors and state regulators can receive a copy by contacting PFI. During the update PFI asked AAFCO members to please pass this information along to any pet food manufacturers in their state that may benefit from this direction.

National Renderers Association—David Meeker

On behalf of the National Renderers Association, David Meeker reported that the rendering industry has been using GMPs and preventive controls for more than 10 years in their voluntary Rendering Code of Practice and thus are prepared to implement FSMA. He also complemented FDA for working cooperatively with the industry in developing the very good FSPCA training curriculum for both PCQIs and inspectors.

National Oilseed Processors Association (NOPA)—Lorraine Gersham

Action Item Table

Responsible	Item	Action	Timing / Status
Mineral Guidelines Working Group	Mineral Guidelines	To review and revise the "Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients". Working Group: Bill Burkholder (lead), Jon Nelson, Tim Costigan, Jennifer Kormos, David Syverson, Bill Hall, David Dzanis, Roger Hoestenbach (now retired) Will Roger Hoestenbach need to be replaced?	Tentative: October 2016
Strategic Plan Emergency Response Working Group	Roundtable Exercise	Host the exercise prior to the 2017 AAFCO Mid-Year Meeting	January 2017
FSMA Implementation Task Force – Working Group 3	Hazard & Contaminant Action Levels and Enforcement Strategies	Work with FSPCA, EIC, ISC, IDC and LMSC to develop a prioritized list of method development once list of contaminants and hazards has been identified by the FSPCA and FDA. A plan of action should be created by the working group to determine the processes of implementing the decision making and method development.	Update January 2017
FSMA Implementation Task Force – Working Group 4	Inspector Training Development	Gap Analysis performed on FSCPA training to determine if there is any missing education that should be provided to inspectors whom perform feed ingredient manufacturing inspections	Update January 2017

Attachments A and B

Attachments A and B may be found online at <http://www.aafco.org/Regulatory/Committees/Feed-and-Feed-Ingredient-Manufacturing>.

Feed Labeling Committee Report

2017 AAFCO Annual Meeting

August 11, 2017, 1:30 pm – 2:30 pm, Bellevue, Washington

Committee Recommendations: None

Board Recommendations: Report approved on October 25, 2017

Membership Recommendations: None

Committee Participants

Members Present: Chair: Dave Dressler (PA); Vice Chair: Dave Phillips (ND); Jason Schmidt (LA), Liz Beckman (WA), Richard Ten Eyck (OR), Miriam Johnson (NC), Erin Bubba (PA), Mika Alewynse (FDA), George Ferguson (NC), Tim Darden (NM), Heather Bartley (WI), Al Harrison (KY).

Advisors Present: Dave Dzanis (ACVN/APPA), Sue Hays (WBFI), Jan Campbell (NGFA), Chris Olinger (NGFA), Angela Mills (AFIA), Meghan Dicks (AFIA), Lorri Chavez (PFI), Pat Tovey (PFI).

Committee Report

A quorum was established to proceed with the meeting.

Introductions and Agenda Review

David Dressler called the meeting to order at 1:30 PM PDT. Due to the filled agenda, roll call of members and advisors was not taken.

Feed Label Review Software

Over the last several meetings, we have discussed the need for a more efficient label review process. The Minnesota Department of Agriculture staff, along with Steve Stewart and Oca Hoeflein from Knowledge Vault, saw a need and developed an Ingredient List Validation on Excel. Steve gave an overview over the phone about what was developed. Several reasons for ingredient statement reviews are needed, standard label review, requests for free sale certificates, and samples.

Establishing the database is labor intensive to set up, because it references pages on the OP and CFR. The database also has a list of ingredient terms that would need to be maintained. Going forward, if AAFCO wishes to adopt this model, discussion would need to be had about where this software will be maintained, and who will be responsible for updating it. Question was asked if this could be incorporated in the online OP.

Dave Phillips formed a workgroup to determine if this is something we want to proceed with and to figure out the cost of this going forward. Dave plans to report to the committee during the 2018 Mid-Year Meeting.

Updates to the Non-Pet Food Labeling Guide

The labeling guide review was completed. There have been updates made, such as changing of label examples that use VFD drugs.

A request was made to change the name of the guide, such as Commercial Feed Labeling Guide. No motion was made to make this change. Will revisit this at the 2018 mid-year meeting to decide on the final name.

Discussion was held about changing the format to make it more appealing, a searchable PDF, and be similar to the Pet Food Labeling Guide. During the 2018 mid-year meeting, Meagan Davis will present options for improvements to the guide.

VFD Labeling

Discussion was held to determine if the committee would like to do anything with the new VFD rule. The Blue Bird labels are available on the website. FDA already provides the necessary examples. The example labels in the OP are not for medicated feed; only the examples in the labeling guide.

A suggestion was made to add a link or directive to visit FDA's website in the OP.

Update to Expert Panel for Nutrient Indicators Review for Beef Cattle

Al Harrison formed a work group, and they have their first conference call planned for September. The group will continue to work throughout the fall/winter and should have recommendations to the group at the 2018 Mid-year meeting.

Medicated Feed Labeling

Medicated feed labels are required to follow blue bird labels, however it can be confusing to regulators, because they need to know which specific blue bird label to review. It was requested that the committee determine if NADA numbers should be included on the product label or with the registration packet (so labels don't have to be changed). Industry was not in favor of requiring this on the label due to the labor and monetary costs to make such changes.

A comment was received from CVM that with today's different sources of drugs, it may be needed to include the NADA number on the product labels.

Non-Medicated Feed Labeling Workshop

The workshop is scheduled for all day July 28 and half day July 29, 2017. This will be the Saturday and Sunday prior to the AAFCO Annual Meeting in Ft. Lauderdale, FL.

A workgroup was formed to set the agenda and determine speakers. It was recommended that one regulatory and one industry representative present on each topic.

A survey was given to all attendees on the first day of the annual meeting. This survey contained ideas for topics to cover during the workshop and asked if anyone would be interested in participating on the workgroup. Responses have been received and those interested in joining the workgroup have been added. The workgroup will have conference calls throughout the fall to develop the agenda for the workshop.

Labeling of Single Feed Ingredients

A topic was brought to the committee chair to discuss proper labeling of single feed ingredients.

Clarification is needed to determine what exactly we should be discussing. There have been several examples presented during workshops for single ingredient feeds. Or, is this topic to be about products like enzymes, which commonly have more than one ingredient, or single ingredients (i.e. soybean meal) or technical additives.

The committee chair was unable to remember the source of the topic, so discussion ended, pending more clarification.

There were no other topics for discussion.

Committee adjourned at 2:27 pm.

Action Item Table

Responsible	Item	Action	Timing / Status
Al Harrison and Work Group	Expert Panel Report	Expert Panel reviewing the NRC requirements and to give a report of recommendations.	January 2018
Mika Alewynse & Meagan Davis Angela Mills & Thomas Belloso	Non-Pet Food Label Design & Format Guide	Determine recommendations for name change and formatting	January 2018
Workshop Working Group	Non-Medicated Feed Labeling Workshop	Develop agenda and select presenters	January 2018
David Phillips and work group	Feed Label Review Software	Determine the costs for developing and maintaining software to aid in label reviews. Determine other logistics associated with the software.	January 2018

Ingredient Definitions Committee Report

2017 AAFCO Annual Meeting
August 11, 2017, Bellevue, Washington

Committee Recommendations:

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 Recommendations:

Report approved on October 25, 2017

Board accepted recommendations 1-3 as presented by the committee.

Association Action: To be considered in January 2018

Membership Recommendations: None

Committee Report

- 1) Roll 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 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 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)
20 (PDF- 899 pages)	DSM Innovation, Inc. BioProducts & Services Division	Inactivated modified <i>Saccharo- myces cerevisiae</i>	<i>Saccharo- myces cerevisiae</i> expressing xylose isomerase from <i>Piromyces</i> 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.	Apr. 29, 2016	FDA has no questions. (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.

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.

AAFCO Ingredient Definitions Committee Webinar Report

October 13, 2017

Committee Recommendations:

When needed, new text is presented in the committee report.

- 1) Publish the following tentative definitions as Official and remove the existing Official definition if any.
 - A) T36.14 Direct-Fed Microorganisms
 - B) T60.117 Dried Black Soldier Fly Larvae
- 2) Establish and Publish the following definitions as Official:
 - A) 33.17 Gamma-Linolenic Acid Safflower Oil
 - B) 73.045 **Pyrophyllite**
- 3) Establish and publish in the OP a new tentative definition for:
 - A) T60.117(B) **Dried Black Soldier Fly Larvae**
- 4) Remove Pyrophyllite from Table 73.001
- 5) IDC recommends the Enzyme Marketing Coordination Document in OP chapter 5 be moved to chapter 6 and embedded in section 30.

Board Recommendations:

Report approved November 13, 2017

Board accepted committee recommendation 1, 2, and 4. Board did not accept recommendations 3 and 5. These recommendations have been sent back to the committee.

Association Action: To be considered in January 2018

Committee Editorial Actions Approved: (no association action needed) Migrate 5 definitions from section 60 to section 40

Membership Recommendations: None

Committee Report

Recording is posted in the BIN /Ingredient Definitions Library

- 1) Roll Call of Committee members present (18/27 quorum was present)
Alan Harrison, Ali Kashani, Bob Church, Brett Boswell, Charlotte Conway, Dan King, Dave Phillips, David Dressler, Erin Bubb, Jennifer Kormos, Ken Bowers, Kent Kitade, Laura Scott, Mark Le Blanc, Richard Ten Eyck, Steve Gramlich, Nathan Price, Shannon Jordre (phone)
- 2) Investigator recommendations to move tentative to official
 - A) T36.14 Direct-Fed Microorganisms – make Official
Erin Bubb moves to ACCEPT. Ali Kashani seconds. MOTION PASSES.
 - B) T60.117 Dried Black Soldier Fly Larvae – make Official
Erin Bubb moves to ACCEPT. Mark Le Blanc seconds. MOTION PASSES.
Erin Bubb - this tentative definition should to move to official. To be recognized by states that need definitions in official status. Working on including definition T60.117 (B) that includes the mechanical extracted meal. Definition B will remove the requirements for SPECIFIC minimum protein and fat percentages, but will still require a protein and fat guaranteed analysis on the product label.
- 3) Work Group Reports
 - A) AAFCO-Affirmed GRAS workgroup report – Move to January 2018 meeting.
 - i) Group has not met. Richard Ten Eyck to meet with Enzyme Technical Association subgroup in two weeks. Searching for common ground.
 - B) DFM Nomenclature Changes workgroup – Move to January 2018 meeting.
 - i) Need new lead – Tamzin Gonzales, NE to lead: tamzin.gonzales@nebraska.gov
 - a) Mika's list to new lead
 - b) Mika will still be technical resource
 - C) Negative List Workgroup report – Move to January 2018 meeting.
 - i) Material library exists in the BIN regulator only reading room. Discussions need to be held as to access and library organization.

- 4) New Definitions, deletes & edits:
- A) New Feed Term “Livestock” – Ali
Ali Kashani expects to have a proposed definition for midyear meeting.
 - B) Salvage Livestock Feed – Ali/Geiger
Ali Kashani needs more information to further develop a definition. Richard Ten Eyck stated that Bob Geiger brought this matter to his attention. Ali Kashani recalled that Dan Danielson may have previously worked on a definition. Kent Kitade recalled this as well and offered to look into it further.
 - C) Common and Usual – Ali
Leah Wilkinson (AFIA) asked why this term was being worked on. Ali Kashani stated that people had been asking for it to be defined. Leah Wilkinson wondered if the Model Bill was a more appropriate place for this term. Richard Ten Eyck stated that it would likely end up in the Model Bill and in Chapter 6 Feed Terms and Ingredient Definitions. Ali Kashani requested volunteers to help develop the term. Leah Wilkinson offered to help Ali.
 - D) Motion: IDC recommends Enzyme Marketing Coordination Document in chapter 5 be moved to Chapter 6 Section 30
Charlotte Conway moves to ACCEPT. Steve Gramlich seconds. MOTION PASSES.
Charlotte Conway (CVM) stated that when they were looking at amending the heading in Section 30, it seemed like it would serve industry better to move the Enzyme Marketing Coordination document to Chapter 6. Lori Gregg (Novozymes) stated that the enzyme table and the Enzyme Marketing Coordination document were originally together, but later separated.
Emily Helmes (Enzyme Technical Association) stated that it makes sense to have the Enzyme Marketing Coordination document with Section 30, but she would like to discuss it and the changes to the Section 30 header with the rest of the Enzyme Technical Association. Charlotte Conway (CVM) not opposed to having the edits to the header, but will need to update the references to Chapter 5 in the Section 30 header.
It was suggested to move the vote for Section 30 header edits to January to make the appropriate edits considering the move of this document.
 - E) Section 30 header edits – Mika. Move to accept proposed edits. Charlotte moves, Mark Seconds. After discussion.
Charlotte Conway moves to TABLE consideration until the January IDC meeting. Mark LeBlanc seconds. MOTION PASSES.
 - F) 33.17 Gamma-Linolenic Acid Safflower Oil – adopt CFR Listing as Official – Brett Boswell
Brett Boswell moves to ACCEPT. Mark LeBlanc seconds. MOTION PASSES.
33.17 Gamma-linolenic acid safflower oil-The food additive gamma-linolenic acid (all-*cis*-6,9,12-octadecatrienoic acid) (GLA) safflower oil contains an omega-6 fatty acid that may be safely used in animal food in accordance with the following conditions:
 - (a) The additive GLA safflower oil is produced in the oil obtained from whole seeds or partially dehulled seeds or both obtained from a *Carthamus tinctorius* L. safflower Centennial variety genetically engineered to express the delta-6-desaturase gene from *Saprolegnia diclina* Humphrey. The 453 amino acid, delta-6-desaturase enzyme converts the fatty acid linoleic acid to gamma-linolenic acid during seed development. This gamma-linolenic acid safflower oil may be safely used in complete dry adult maintenance dog food as a source of gamma-linolenic acid and other omega-6 fatty acids in accordance with the following prescribed conditions:
 - (1) The gamma-linolenic acid safflower oil obtained from the seeds of the genetically engineered safflower Centennial variety may be blended with oil obtained from seeds of non-engineered oleic acid safflower varieties in order to meet the specifications required for the additive or the blend in paragraph (2).
 - (2) The additive or a safflower oil blend containing the additive for use in animal food meets the following specifications:
 - (i) Crude fat content of the gamma-linolenic acid safflower oil or its blend is not less than 99.5 percent.

- (ii) Gamma-linolenic acid content is between 400 and 450 milligrams gamma-linolenic acid per gram of the gamma-linolenic acid safflower oil or its blend.
 - (iii) Total content of stearidonic acid and *cis*, *cis*-6, 9-octadecadienoic acid in the gamma-linolenic acid safflower oil or its blend must not exceed a total of 0.3 percent.
- (3) Addition of gamma-linolenic acid safflower oil, or its blend, to complete dry adult maintenance dog food must meet the following:
 - (i) Addition of the oil or its blend cannot provide more than 36 mg gamma-linolenic acid per kilogram body weight of the dog per day in more than 86 mg of the gamma-linolenic acid safflower oil or its blend. This maximum addition rate of the gamma-linolenic acid safflower oil, or its blend, is 0.3 percent of a complete dry adult maintenance dog food containing 3,600 kilocalories of metabolizable energy per kilogram of food as-fed.
 - (ii) Adjustments must be made for dog food formulas of different caloric density and/or that are fed to specific weights, breeds, or dogs of different activity levels to meet the requirements of this paragraph.
- (b) To assure safe use of the additive in addition to other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling of the additive shall bear the following:
 - (1) The name, gamma-linolenic acid (GLA) safflower oil.
 - (2) A guarantee for the minimum content of gamma-linolenic acid.
 - (3) Adequate directions for use such that the finished animal food complies with the provisions of paragraph (a)(3) of this section.

(Adopted xxxx) 21 CFR 573.492

G) Migrate items from section 60 to 40 – Cat & Erin

Erin Bubb moves to ACCEPT the moving and renumbering as an editorial change. Ken Bowers seconds. MOTION PASSES. Section editors will handle in next OP revision.

- 40.1 (Old 60.1) Dried apple pomace
- 40.2 (Old 60.2) Dried apple pectin pulp
- 40.28 (Old 60.28) Dried potato products
- 40.8 (Old 60.8) Dried tomato pomace
- 40.112 (Old 60.112) (blank fruit) pomace

Cat Marrier -Several items that were proposed to move to Section 40 were moved in 2017 OP. The board never received the recommendation to move.

Was dried apple pomace to be deleted? Erin Bubb -no formal recommendation received to delete.

H) T60.117(B) Dried Black Soldier Fly Larvae – Erin

Erin Bubb moves to ACCEPT Proposed Definition as Tentative. Mark LeBlanc seconds. MOTION PASSES.

T60.117 (B) Dried Black Soldier Fly Larvae is the dried larvae of the Black Soldier Fly, *Hermetia illucens*, with or without mechanical extraction of part of the oil, that has been raised on a feedstock composed exclusively of feed grade materials. The ingredient must be labeled with guarantees for minimum crude protein and minimum crude fat on an as-fed basis. If oil is mechanically extracted, maximum crude fat must also be guaranteed on the ingredient label. The ingredient is dried by artificial means to no more than 10% moisture. It is for use in salmonid feed as a source of protein and fat consistent with good feeding practices. (Proposed xxxx)

Discussion:

Including with or without mechanical extraction (modeled after fish meal) removing the requirement for specific protein and fat percentages, but will allow whole, ground, or meal where the oil has been extracted.

Richard Ten Eyck asked about expanding to other species, Erin Bubb not expecting additional species in the near future. Charlotte Conway, CVM has received inquiries as to what would be needed (studies) but nothing formal.

Kristi Smedley, some products might have requirement for max/min crude fat requirement. Why is a max being required? Richard Ten Eyck: camelina meal -fat level drove what species it would be used for. Charlotte Conway: using addition of second fat requirement would be useful for nutritionist about fat content and providing additional info that this is mechanical extraction.

Kent Kitade "on as-fed basis" is this necessary? The guarantees are for the product being sold and not how it is being used. As fed basis was to distinguish from dry fed basis. Would this be enforceable? Dave Edwards figured it would be easier to regulate as fed than on a dry matter basis. Charlotte Conway "as fed" is the same as "as is". Kent Kitade disagreed and thinks that as is basis is the best path forward and calculate. Kristi Smedley stated that the Model Bill (Model bill section 5 under A3) has guaranteed analysis expressed on an "as is" basis, and, therefore, suggests changing "as fed" to "as is".

Dave Dressler consumers may not know what they are getting. Would having the guarantees listed help the consumer know what they are getting. Erin Bubb do you think that the ingredient needs to declare mechanically extracted on the label this could be added to the definition. Dave Edwards stated that would be two different definitions. As a single ingredient would have mechanical extracted, but if mixed feed you don't need it.

Laura Scott stated Canada has this approved as well and has it allowed for use in poultry.

Does it need to be considered if there needs to be two definitions for the different species.

Dave Dressler agrees that there should be.

Investigator can make changes when tentative before it moves to official.

- I) 73.045 21 CFR 573.900 Pyrophyllite – adopt CFR Listing – Richard
Steve Gramlich moves to ACCEPT and publish the definition as Official. Ken Bowers seconds. MOTION PASSES.

73.045 Pyrophyllite (aluminum silicate monohydrate) may be safely used as the sole anticaking aid, blending agent, pelleting aid, or carrier in animal feed when incorporated therein in an amount not to exceed 2 percent in complete animal feed. 21 CFR 573.900

- J) Remove Pyrophyllite from Table 73.001
Charlotte Conway moves to ACCEPT as long as 73.045 is published. Steve Gramlich seconds. MOTION PASSES

5) Discussions:

- A) Status on high profile ingredients (if needed) – Richard / CVM
None at this time
- B) Standard of identity Template Functions – Move to January 2018 meeting.
Will discuss further in January
- C) Hemp Update – Bob Church & Brett Boswell, Bob Geiger, Colorado
Bob Church: Colorado seems to be moving in the right direction and industry is also moving forward. Main focus seems to be seed and seed oil. Has not received any feed ingredient definitions.
Charlotte Conway, CVM has not received any FAP's. Colorado Project is moving forward and in the right direction. Subgroups see seed oil and seed meal are the ingredients of most interest for animal food. Having conversations on submissions, so expects to see something soon.
Ali Kashani, WSDA got inquiry about hemp seed recently. People are surprised that not allowed in animal food. Ali will send them to Bob Church. WSDA Assistant Director has submitted request AVMA for presentation in their July 2018 meeting.
Brett Boswell – similar boat as Bob Church on oil. A few firms have significant portions of a dossier. One firm is having feeding trials reviewed.
Jean Hofve, DVM, there is a great deal of interest in hemp products in the veterinary area.
- D) Next committee meeting will be at AAFCO Midyear meeting in Anaheim, CA 1/23/18.
Meeting Registration is opened, but waiting to put up until the OP is ready in the next few weeks.

Minutes accepted 10/24/17 by all members present at the meeting. 15/27 voted

Inspection and Sampling Committee Report
2017 AAFCO Annual Meeting
August 10, 2017, 11:00 am – 12:00 pm, Bellevue, Washington

Committee Recommendations: None

Board Recommendations: Approved report on October 25, 2017

Membership Recommendations: None

Committee Action Items

- 1) Include the Biosecurity Procedures Document in the AAFCO Inspectors Manual
- 2) Bulk Aseptic Sampling Work Group Charge: to included protocol for bulk aseptic sampling. The group includes the following members: Tim Lyons – MI; Miriam Johnson – NC; Kevin Klommhaus – FDA; Jacob Fleig – MO.
- 3) AAFCO Inspectors Manual FSMA Alignment Work Group Charge – to review the AAFCO Inspectors Manual to ensure it aligns with FSMA requirements. The group includes the following members: Kevin Klommhaus (lead) – FDA; Brett Groves – IN; Jim True – KY.

Committee Participants

Members Present: Chad Linton – WV (Committee Chair); Stan Cook – MO; Bob Church – MT; Bob Geiger – IN; Tim Lyons – MI; Kevin Klommhaus – FDA; Brett Groves – IN; Meagan Davis – LA; David Dressler – PA; Laura Scott – CAN; Jim True – KY; Miriam Johnson – NC; Andy Gray – MT; Wayne Nelson – CT; Jacob Fleig – MO

Advisors Present: Megan Dicks – AFIA; Pat Tovey – AFIA; Jan Campbell – NGFA; Chris Olinger – NGFA

Others Present: Mark LeBlanc – LA; Richard Ten Eyck – OR;

Committee Report

Chad Linton called the meeting to order at 11:05 AM PST. Members and advisors in the room introduced themselves.

Aseptic Sampling – Bob Geiger

A work group was formed during the 2017 Midyear Meeting to address missing procedures for bulk aseptic sampling in the sampling procedures section of the AAFCO Inspectors Manual.

Bob Geiger presented during the committee meeting. Proposed procedures and equipment to utilize when collecting bulk samples aseptically were presented to the committee for discussion. Updates to attachment B were sent to the work group prior to the meeting. The workgroup will reconvene and discuss both the information presented by Bob Geiger and the updates to attachment B. Further development of bulk aseptic sampling protocols will be presented at the 2018 Midyear Meeting.

Addition of VFD Update to Inspectors Manual – Chad Linton, Jacob Fleig & Brett Groves

Jacob Fleig made a motion to accept the VFD Update as written in order to include them in the AAFCO Inspectors Manual. Brett Groves seconded the motion. Motion carries.

AITs Review – Meagan Davis

AITs was held in Gettysburg, PA in June of 2017. AITs for 2018 will be hosted by MO and KS in Kansas City, MO in June of 2018.

BITS Review – Meagan Davis

BITS will be held Oct. 24-26, 2017 in Boise, ID. The registration deadline is Oct. 1, 2017 and the Hotel reservation deadline is Sept. 23, 2017.

AAFCO Feed Inspector's Manual and FSMA Alignment – Kevin Klommhaus & Brett Groves

A review of the AAFCO Feed Inspector's Manual is being performed to ensure it is aligned with the requirements of FSMA. A workgroup was formed and provided a deadline of August 2018 to complete this task. Kevin Klommhaus presented to the committee for review the suggested language. Due to differences in compliance programs within the states further discussion will occur to determine the final direction of the update. The GMP document included in the AAFCO Official Publication will be removed from the OP and placed in the updated FSMA section of the Inspectors Manual.

AAFCO Sampling Study – Mark LeBlanc

Historical work performed regarding our current sampling procedure and stated a literature review was being performed was provided during the 2017 Midyear Meeting.

The group requested direction from the committee in order to prioritize the study. The group decided that revalidating the sampling methods for crude protein, crude fat and crude fiber analysis was unnecessary, so the priority would be sampling for other analytes. During the committee meeting the question was proposed as to which analyte would be the most valuable to analyze and would provide the most useful data to the study. The charge of the group will be to develop an RFP using AAFCO methods. It was also discussed that the bulk aseptic sampling addition should be included as part of the sampling study. The sample study work group was not provided a deadline or action item, leaving the decisions to pursue future sampling studies to the work group.

Action Item Table

Responsible	Item	Action	Timing / Status
Work Group	Bulk Aseptic Sampling	Develop protocol for bulk aseptic sampling	Unknown
Work Group	Feed Inspector's Manual	Ensure the manual aligns with FSMA requirements	February 2018

Attachment B

4.3.6 - ASEPTIC SAMPLE Aseptic sampling is a technique used to prevent contamination by your sampling method. Aseptic sampling involves the use of sterile sampling implements and containers. Your sampling technique is where the lot or sample is contacted only by the sampling implements or the container. Samples collected using aseptic technique, will permit testimony that the bacteriological findings accurately reflect the condition of the lot at the time of sampling and, ideally, at the time of the original shipment. Whenever possible collect intact, unopened containers. Aseptic sampling is often used in the collection of in-line samples, environmental samples, product samples from bulk containers and collection of unpack-aged product that is being collected for microbial analysis. Note: Products in 55 gallon drums, or similar large containers, either aseptically filled or heat processed, should not be sampled while the shipment is en route unless the owner accepts responsibility for the portion remaining after sampling. Try to arrange sampling of these products at the consignee (user) so the opened containers can be immediately used or stored under refrigerated conditions. Use ASEPTIC TECHNIQUE when sampling these products. **For more guidance on aseptic technique, you may consult the course Food Microbiological Control 10: Aseptic Sampling, which is available to FDA employees through the ORA U intranet site.**

4.3.6.1 - General Procedures If it is necessary to open containers, draw the sample and submit it under conditions, which will prevent multiplication or undue reduction of the bacterial population. Follow the basic principles of aseptic sampling technique. Take steps to minimize exposure of product, sampling equipment, and the interior of sampling containers to the environment.

4.3.6.1.1 - Sterilized Equipment Use only sterilized equipment and containers. These should be obtained from the servicing laboratory or in an emergency, at local cooperating health agencies. Presterilized plastic or metal tools should be used. However, if unavailable, the metal tools can be sterilized immediately before use with a **propane torch**. Permit the tool to cool in the air or inside a sterile container before using. Soaking with 70% alcohol and flaming off is an acceptable method of field sterilization, and may be used as a last resort. If it is necessary to drill, saw, or cut the item being sampled (such as large frozen fish, cheese wheels, frozen fruit, etc.), if at all possible, use **stainless steel bits, blades, knives, etc.** Wooden handled sampling instruments are particularly susceptible to bacterial contamination, are difficult to sterilize, and should be avoided.

4.3.6.1.2 - CAUTIONS Be extremely careful when using a propane torch or other flame when sterilizing tools and equipment. Evaluate the conditions pertaining to explosive vapors, dusty air, flame restricted areas, firm's policy or management's wishes. The use of supportive devices should be considered when torch is not being hand held. Also be sure all flammable liquids, such as alcohol, in your filth kit are in metal safety cans and not in breakable containers. If it is necessary to handle the items being sampled, use sterile disposable type gloves (rubber, vinyl, plastic, etc. - surgeon's gloves are good). Use a fresh glove for each sub and submit an unopened pair of gloves as a control. See IOM 4.3.6.5. 4

4.3.6.1.3 - Opening Sterile Sampling Containers When opening sterile sampling containers, work rapidly. Open sterile sampling containers only to admit the sample and close it immediately. Do not touch the inside of the sterile container, lip, or lid. (See IOM 4.3.5)

4.3.6.1.4 - Dusty Areas Do not collect samples in areas where dust or atmospheric conditions may cause contamination of the sample, unless such contamination may be considered a part of the sample.

4.3.6.2 - Sampling Dried Powders Cautions - The proper aseptic sampling of dried milk powder, dried eggs, dried yeast, and similar types of products is difficult because they are generally packed in multilayer poly-lined paper bags. These may be stitched across the entire top, may have filler spouts, or the top of the poly-liner may be closed or sealed with some type of "twists". The practice of cutting an "X" or "V" or slitting the bag and folding the cut part back to expose the contents for sampling should not be used because it creates a resealing problem; the opening cannot be properly repaired. The following procedures have been approved by the scientific units in Headquarters and should be used when sampling this type product. 4

4.3.6.2.1 - Bag And Poly-Liner Stitched Together Across Top Seam

1. Remove as much dust as possible from the seam end by brushing and then wiping with a cloth dampened with alcohol. Note: This does not sterilize the bag as porous paper cannot be sterilized.
2. Remove the seam stitching carefully (and dust cover, if any) and spread the walls of the bag and the poly-liner open enough to permit sampling being careful that no extraneous material such as dust, bits of twine, paper, etc., drops into the product.

3. Carefully scrape off the surface of the product with a sterile device and aseptically draw the sample from the material below.
4. Carefully reclose the bag and re-stitch by hand, or by machine if firm or **FDA portable sewing machine** is available.

4.3.6.2.2 - Bag Stitched Across Top And Poly-Liner Twist-Closed And Sealed With "Twist" Device - Wire, Plastic, Etc.

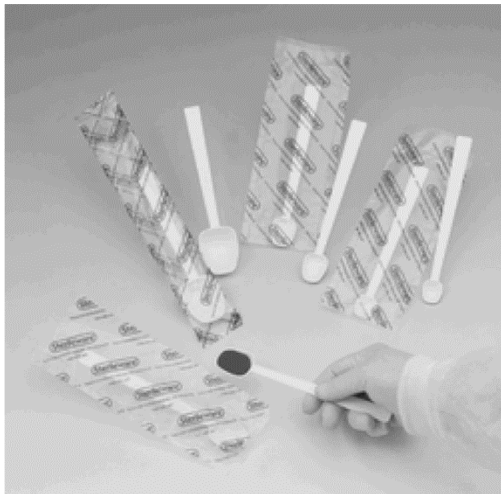
1. Brush, alcohol wipe, and remove stitching as described.
2. Remove "twist" seal and carefully open poly-liner using caution that no extraneous material drops into the product.
3. Draw aseptic sample in same manner as in step 3 above.
4. Carefully close the poly-liner with a twisting motion and reseal with "twist" seal arranging it so it will not puncture the poly-liner, and re-sew bag as in step 4 above.

CHAPTER 4 INVESTIGATIONS OPERATIONS MANUAL 2016 128 4.3.6.2.3 - Bags With Filling

Spouts The filling spout will be located at one side of the top stitching and will either pull out to form a top or side spout.

1. Brush and alcohol wipe the area around the spout and carefully pull it out to reveal the opening. It is better to have the bag on its side while pulling the spout so any dust in the opening falls outside the bag.
2. Carefully spread the sides of the spout apart and aseptically draw the sample. A trier or long handled device is usually better for this type opening because of the limited opening.
3. Carefully close the spout with a firm twisting motion and be sure the opening is closed prior to pushing back into the bag.

4.3.6.4 - Sample Handling For frozen samples, pre-chill sterile containers before use and keep frozen with dry ice. Use ordinary ice or ice packs for holding and transporting unfrozen samples that require refrigeration. See IOM 4.5.3.5, 4.5.3.6 and 8.3.3.3. Under normal circumstances dried products may be shipped unrefrigerated except in cases where they would be exposed to high temperatures, i.e., above 37.8 °C (100 °F). Submit samples subject to rapid spoilage (specimens of foods involved in poisoning cases, etc.) by immediate personal delivery to the bacteriologist where feasible.





Laboratory Methods and Services Committee Report

2017 AAFCO Annual Meeting
August 11, 2017, 8:00 am – 5:00 pm, Bellevue, WA

Committee Recommendations: None

Board Recommendations: Approved report on October 25, 2017

Association Actions: None

Committee Participants

Committee Members Present

Aaron	Price	CFIA	Aaron.Price@inspection.gc.ca	Co-Chair
Nancy	Thiex	AAFCO	nancy.thiex@gmail.com	Co-Chair
Srinu	Chigurupati	FDA	srinirasulu.chagurupati@fda.hhs.gov	Member
Ametra	Berry	GA Dept. of Agriculture	ametra.berry@agr.georgia.gov	New member 8/2017
Deepika	Curole	LSU Dept. of Ag Chemistry	dcurole@ldaf.state.la.us	Member
Manisha	Das	FDA	manisha.das@fda.hhs.gov	Member
Ted	Gatesy	MI Dept. of Ag & Rural Dev	gatesyt@michigan.gov	Member
Teresa	Grant	NC Dept. of Agriculture	teresa.grant@ncagr.gov	Member
Casey	Guccione	KS Dept. in Ag	casey.guccione@ks.gov	New member 8/2017
Tai	Ha	Nebraska Dept. of Ag	tai.ha@nebraska.gov	Member
Heidi	Hickes	MT Dept. of Ag	hhickes@mt.gov	Member
H. Dorota	Inerowicz	OISC	inerowic@purdue.edu	Member
Mary	Koestner	MO Dept. of Ag	Mary.koestner@mda.mo.gov	Member
Dominika	Kondratko	CO Dept. of Agriculture	dominika@kondratko@state.co.us	Member
Joyce	Lewis	LA Dept. of Ag & Forestry	jlewis@ladf.state.la.us	Member
Patty	Lucas	FL Dept. of Ag & CS	partricia.lucas@freshfromflorida.com	Member
Kristi	McCallum	CO Dept. of Agriculture	kristina.mccallum@state.co.us	Member
Lawrence	Novotny	SD - retired	lawrence.novotny@sdaglabs.com	Member
Louise	Ogden	AAFCO	pt@aafco.org	Member
Brenda	Snodgrass	OK Dept. of Ag	Brenda.Snodgrass@ag.ok.gov	Member
Michele	Swarbrick	MN Dept. of Ag	Michele.swarbrick@state.mn.us	Member
Lei	Tang	FDA CVM	lei.tang@fda.hhs.gov	Member
Sharon	Webb	UK Reg Services	sharon.webb@uky.edu	Member
Sara	Williams	OTSC	smw@otcs.tamu.edu	Member

Committee Advisors Present

Dan	Berg	Covance	dan.berg@covance.com	Advisor
Andy	Crawford	AAFCO PTP	andy@crawford.org	Advisor
Bill	Hirt	ANAB	bhirt@anab.org	Advisor
Jeff	Horst	Agri-King, Inc.	jeff.horst@agriking.com	Advisor
Melissa	Miller	Elanco		Advisor
Lars	Reimann	Eurofins	larsreimann@eurofins.com	Advisor
Jeff	Rich	Romer Lab	jeff.rich@romerlabs.com	Advisor
Ken	Riter	Nestle-Purina Analytical Labs	ken.riter@purina.nestle.com	Advisor
Leo	Schilling	Eurofins	leoschilling@eurofins.com	Advisor

Committee Report

- 1) Call to Order
 - A) The Agenda was approved with minor changes.
 - B) Introductions – sign-up sheet sent around.
 - C) Review of Committee Roster and Appointments. Committee members were reminded of the requirement for them to vote electronically when requested.

- 2) It was agreed to move the discussion about ways to increase participation to the “Round Table Session” at the end of the agenda.
- 3) FDA Cooperative Agreement – Yvonne Salfinger and Nancy Thiex
 - A) PowerPoint presentation - She mentioned that FDA had put out an RFP for a much-expanded program on the Laboratory Curriculum Framework and APHL is taking the lead in preparing a response.
 - B) Data Acceptance document – link:
<https://www.aphl.org/aboutAPHL/publications/Documents/FS-2017Jun-Best-Practices-Food-Feed-Data.pdf>
 - C) Nancy Thiex reported that the old contract was winding down. Grant Review: The Laboratory Accreditation meeting scheduled for January 2018 in New Mexico. The program had received a “no cost extension” through 2018 to complete several tasks in the pipeline including accreditation of PT program, updating of “Sample Guidelines” and producing webinars and lab workshops.
- 4) Update from FDA – Dan Rice
 - A) Reorganization – Program Alignment – FDA Office of Regulatory Affairs (ORA) Office of Human and Animal Foods is in the process of updating website.
 - B) There is still funding available for states but there will be reductions.
 - C) Methods available from FDA to states – BAM is up-to-date – not all methods are up-to-date on the website.
 - D) Lars - Approving LC-MS/MS – FDA has been hesitant about drug guarantees. Srinu: Denver lab is developing new methods for drugs, using LCMSMS. Dan Rice - Have issues in getting enough labs to do a multi-lab validation, will reach out to states. Lars: Our method needs statement – Aaron with LC-MS/MS may be more difficult to meet the 5% for lower level guarantees. Lei will take it back to the FDA lab group.
- 5) FSMA Implementation Task Force Update –Teresa Grant
 - A) Task force lab portion has not met in over a year. Waiting for hazards /process controls yet to be identified/completed. The lab portion will be added in 2018.
- 6) State Feed Lab Network (Center of Excellence) – Nancy
 - A) Nancy reported that the workgroup had prepared a white paper on the issue that had been submitted to the AAFCO BoD 1+ year ago and currently the Working group is in the process of putting together 2 surveys – a survey of needed analyses currently not available in state labs as well as services offered by state labs. Kristy McCallum requested that Micro be included in the surveys.
- 7) Working Group Updates (based on method needs)
 - A) Tylosin – Leo Shilling – PowerPoint
 - i) Leo Shilling provided update, LC-MS/MS method – residue levels for feeds
 - ii) Dan Rice expressed interest in using Leo's presentation to argue for accepting LC-MS/MS based methods. FDA Denver will provide additional info.
 - iii) Leo asked for labs interested in collaborating on methodology.
 - B) CTC – Leo Shilling – PowerPoint
 - i) HPLC method is “somewhat” “OK” but peak shape is poor. The method needs additional work. Leo asked for labs interested in collaborating on this issue.
 - ii) Not ready for interlaboratory – need collaboration from FDA/state labs.
 - C) Fat Soluble Vitamins – Ken Riter – PowerPoint. Ken Riter and Dorota Inerowicz reviewed the 2017 test results. Sample variability/homogeneity was significantly improved over the 2015 study. However, no one method stood out over the others, and only one vitamin E method was eliminated from consideration. The Working group will solicit validation data for the candidate methods and compare to the Methods Needs Statements and also consider other factors in selecting a method or methods to collaboratively study.
 - D) Multi-element – Sharon Webb, Michele Swarbrick and Bob Sheridan. The working group will have a presentation in January 2018.
 - E) Sugars – Dan Berg reported relatively little activity lately. Most efforts have centered around finding funding to take the method through the full AOAC process including establishing stakeholder and expert review panels. Most of the funding appears to have been found. A WG will meet on Sunday Sept 24 at 8:30 during the annual AOAC meeting. The focus will also

- include FOS/GOS analyses. The Covance method is currently undergoing a 4 lab method validation study. IDF-ISO also has a very similar method for sugar analysis. The use of arabinose as internal standard was suggested.
- F) Dietary Starch – Lars Reimann reported that the Dietary Starch method developed by Dr. Mary Beth Hall was in its 3rd year as a First Action method and would be reviewed for Final Action status at the upcoming AOAC Annual meeting. He requested that users share any feedback they have concerning the use of the method with him as soon as possible.
 - G) Mycotoxin – Bob Sheridan reported that the WG was pretty much on “Hold” pending getting hold of the EU method. The WG needs guidance as to tasks and goals.
 - H) Best Practices Group – working on document addressing moisture determinations. Larry Novotny and Jane Caldwell presented survey and other data information. WG working on recommendations.
 - I) The previous white paper (focused on fiber analysis) will be published in JAOAC by John Fahey.
- 8) Vitamin A accreditation process at a State Lab – Heidi Hickey presented on the work that her lab went through in order to get the Vitamin A method developed by OISC to a validation status suitable for inclusion into her lab’s ISO scope.
 - 9) Effects of particle size of extraction size for effective mycotoxin analysis - Julie Brunkhorst– PowerPoint. Julie presented data showing how the analytical variability associated with mycotoxin analyses could be reduced through further particle size reduction and the use of a larger analytical portion. She recommended grinding to pass a 20 mesh screen and using a 25 g analytical sample portion.
 - 10) Mycotoxin best practices – Nancy Thiex reported that Distillers Grain Council had developed a working group currently with 43 participants. Goal for the group is to produce scientifically supported, publishable recommendations.
 - 11) Method Needs Survey - Sharon Webb reported the results of a survey that had been completed by State feed labs focusing on reviewing and prioritizing method needs.
 - 12) Quality Assurance Sub-Committee-
 - A) Kristi McCallum outlined what services the Quality Assurance Sub-Committee makes available to regulatory labs. She also mentioned that FDA provides free PT samples as well.
 - B) Bill Hirt reviewed the challenges behind traceability of measurements including
 - i) Measurement of uncertainty
 - ii) Metrological Traceability
 - iii) Proficiency testing
 - 13) Laboratory Sampling Program – Nancy Thiex, Michele Swarbrick and other WG members provided an update on the “Guidance on Obtaining Defensible Test Portions” (aka “Good Test Portions”). The original document was written in 2000 but is now being updated. Currently reviewing Sample Quality Criteria. Discussion where a 2-day training seminar would be held (e.g., in connection with an AOAC meeting and whether a WebEx option should be included).
 - 14) Round table discussion:
 - A) FDA brought out the issue of updating a method for analyzing thiamine in canned cat food in response to recent cases of deficiencies associated with products in commerce. It was agreed that a method needs statement needed to be completed as well as a review of available methods.
 - B) FDA was interested in getting an assessment of how many tests for ruminant material in feeds and ingredients was carried out annually using PCR based methods. FDA is considering providing primers for such tests and needed to know the required amount.
 - C) AAFCO requested suggestions of methods worthy of / in need of funding similar to the funding of the establishment of the sugar method. Suggestions should be forwarded to Nancy Thiex.
 - D) Suggested actions that might increase state participation in the LM&S Committee meetings included
 - i) Have labs talk about what they do
 - ii) Give travel grants to States
 - iii) Add chemistry training
 - iv) Highlight that calling in is an option in most cases
 - v) Make a lab flier as part of outreach activities (need WG)

- vi) Survey why some states do not send staff to meeting.
- E) Criteria for humidity in grinding rooms. The issue of humidity in grinding rooms and its effect on sample prepared under those conditions were discussed. It was suggested to develop a recommended standard addressing this issue.

Action Item Table

Responsible	Item	Action	Timing / Status
State feed lab network W.G.	Survey	Develop 2 surveys to send to State labs and Program officials to solicit the current laboratory method capabilities and capacities and perceived program needs.	Before Jan. 2018
Fat soluble vitamin W.G.	Survey	Survey labs that participated in the inter-laboratory testing to collect their method details.	Before Jan. 2018
Multi-element W.G.	Start-up	Sharon Webb, Michele Swarbrick and Robert Sheridan to start this working group and present work so far at the next AAFCO meeting in January	January 2018 meeting
Multi-mycotoxin W.G.	Guidance	The working group will solicit guidance from the committee to determine what are its tasks and goals.	Before Jan. 2018
Best Practices W.G.	Moisture	The group will prepare the final recommendations for the moisture methods.	January 2018 meeting

First Name	Last Name	Affiliation	E-mail	Role
Hema	DeAlew	FDA CVM		
Jenny	Bailie	Milk Specialties	jbailie@milkspecialties.com	
Linda	Benjamin	FDA CVM	linda.benjamin@fda.hhs.gov	
Dan	Berg	Covance	Dan.berg@covance.com	Advisor
Ametra	Berry	GA Dept. of Agriculture	ametra.berry@agr.georgia.gov	New member 8/2017
Sue	Brace	IFPTI	sue.brace@ifpti.com	
Julie	Brunkhorst	Trilogy Labs	julie@trilogylab.com	Speaker
Jane	Caldwell	Midwest Laboratories	jcaldwell@midwestlabs.com	
Angela	Carlson	SGS	angela.carlson@sgs.com	
Srinu	Chigurupati	FDA	srinirasulu.chagurupati@fda.hhs.gov	Member
Andy	Crawford	AAFCO PTP	andy@crawford.org	Advisor
Deepika	Curole	LSU Dept. of Ag Chemistry	dcurole@ldaf.state.la.us	Member
Manisha	Das	FDA	manisha.das@fda.hhs.gov	Member
Hema	De Alwis, Ph.D.	FDA CVM	Hemakanthi.DeAlwis@fda.hhs.gov	
Karen	Fischer	OTSC	kmf@otsc.tamu.edu	
Sally	Flowers	Nebraska Dept. of Ag	sally.flower@nebraska.gov	
Annie	Fournier	CFIA	Annie.fournier@inspection.gc.ca	
Ken	Gilmurray	JBS USA	ken.gilmurray@ibssa.com	
Hollis	Glenn	CO Dept. of Agriculture	hollis.glenn@state.co.us	
Teresa	Grant	NC Dept. of Agriculture	teresa.grant@ncagr.gov	Member
Casey	Guccione	KS Dept. in Ag	casey.guccione@ks.gov	New member 8/2017
Tai	Ha	Nebraska Dept. of Ag	tai.ha@nebraska.gov	Member
Dan	Hengst	Covance Labs	dan.hengst@covance.com	
Heidi	Hickes	MT Dept. of Ag	hhickes@mt.gov	Member
Bill	Hirt	ANAB	bhirt@anab.org	Advisor
Jeff	Horst	Agri-King, Inc.	jeff.horst@agriking.com	Advisor
H. Dorota	Inerowicz	OISC	inerowic@purdue.edu	Member
Bilan	Jessie	LA Dept. of Ag & Forestry	bjessie@ldaf.state.la.us	
Solmon	Kariuki	UK Reg Services	s.kariuki@uky.edu	

First Name	Last Name	Affiliation	E-mail	Role
Brenda	Keavey	WV Dept. of Ag	bkeavey@wvda.us	
Crystal	King	Veterinarian Recommended Solutions	cking@vrshealth.com	
Dominika	Kondratko	CO Dept. of Agriculture	dominika@kondratko@state.co.us	Member
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Patty	Lucas	FL Dept. of Ag & CS	partricia.lucas@freshfromflorida.com	Member
Kristi	McCallum	CO Dept. of Agriculture	kristina.mccallum@state.co.us	Member
Karen	Miedena	Thomas Labs	karenm@thomaslabs.com	
Melissa	Miller	Elanco		Advisor
Dragan	Momcilovic	FDA	Dragan.Momcilovic@fda.hhs.gov	
Quintin	Muenks	MO Dept. of Ag	quintin.muenks@mda.mo.gov	
Monica	Naylor	Westway Feed	monica.naylor@westwayfeed.com	
Matt	Nichols	Neogen	mnichols@neogen.com	
Lawrence	Novotny	SD - retired	lawrence.novotny@sdaglabs.com	
Louise	Ogden	AAFCO	pt@aafco.org	Member
Kevin	Perkins	Merieux/Silliker	kevin.perkins@mxns.com	
Aaron	Price	CFIA	Aaron.Price@inspection.gc.ca	Co-Chair
Chantilly	Reddman	LA Dept. of Ag & Forestry	chant_r@ldaf.la.gov	
Lars	Reimann	Eurofins	larsreimann@eurofins.com	Advisor
Dan	Rice	FDA ORA ORS	daniel.rice@fda.hhs.gov	Speaker
Ken	Riter	Nestle-Purina Analytical Labs	ken.riter@purina.nestle.com	Advisor
Yvonne	Salfinger	APHL		
Leo	Schilling	Eurofins	leoschilling@eurofins.com	Advisor
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Frank	Sikora	University of Kentucky	fsikora@uky.edu	
Brenda	Snodgrass	OK Dept. of Ag	Brenda.Snodgrass@ag.ok.gov	Member
Michele	Swarbrick	MN Dept. of Ag	Michele.swarbrick@state.mn.us	Member
Lei	Tang	FDA CVM	lei.tang@fda.hhs.gov	Member
Nancy	Thiex	AAFCO	nancy.thiex@gmail.com	Co-Chair
Victoria	Watkins	KS Dept. in Ag	victoria.watkins@kda.ks.gov	
Sharon	Webb	UK Reg Services	sharon.webb@uky.edu	Member
Chris	Weiss	IFPTI	chris.weiss@ifpti.com	
Sara	Williams	OTSC	smw@otcs.tamu.edu	
Alicia	Wolf	Mercola	aliciaw@mercola.com	
Dancia	Wu	OISC	scharfd@purdue.edu	

Model Bills and Regulations Committee Report

2017 AAFCO Annual Meeting
August 10, 2017, Bellevue, Washington

Committee Recommendations:

- 1) The Model Bills and Regulations Committee recommends that language as indicated in Attachment B be reinserted into the AAFCO Model Bill and that the AAFCO Board of Directors review the proposed reinsertion for future consideration by the Association membership.
- 2) The Model Bills and Regulations Committee recommends that language as indicated in Attachment C be deleted from the Model Bills and Regulations and that the AAFCO Board of Directors review the proposed deletion for future consideration by the Association membership.
- 3) The Model Bills and Regulations Committee recommends that the Pet and Specialty Pet definitions be revised as indicated in Attachment D and that the AAFCO Board of Directors review the proposed revisions for future consideration by the Association membership.
- 4) The Model Bills and Regulations Committee recommends the additions and revisions as indicated in Attachment E be made to AAFCO Model Regulation PF4(a) and that the AAFCO Board of Directors review the proposed additions and revisions for future consideration by the Association membership.
- 5) The Model Bills and Regulations Committee recommends the additions as indicated in Attachment F be made to AAFCO Model Regulation PF10 and that the AAFCO Board of Directors review the proposed additions for future consideration by the Association membership.
- 6) The Model Bills and Regulations Committee recommends that the Standard Uniform Interpretation and Policy as indicated in Attachment G be added to the *Official Publication* and that the AAFCO Board of Directors review the proposed addition for future consideration by the Association membership.

Board Recommendations:

Report approved on October 25, 2017

Board accepted recommendations 1-6 as presented by the committee.

Association Actions: None

Committee Report

Model Bills and Regulations Committee Chairman Doug Lueders called the meeting to order at 1:30 p.m. on August 10, 2017. He welcomed committee members, industry advisers and guests who were present, and reviewed the agenda.

In addition to Chairman Lueders, committee members participating in the meeting were: Ken Bowers (Kansas), Bill Burkholder (FDA), Richard Ten Eyck (Oregon), and Scott Ziehr (Colorado).

Industry advisers participating were: Angela Mills and Steve Younker (AFIA); David Dzanis (APPA/ACVN); Emily Helmes (Enzyme Technical Association); Jan Campbell and David Fairfield (NGFA); Angele Thompson and Pat Tovey (PFI); and Sue Hayes (Wild Bird Feeding Industry).

Minutes from Previous Committee Meetings

Chairman Lueders noted that minutes from the January 16, 2017 committee meeting conducted in Mobile were previously approved, posted on the AAFCO website and were included in the 2017 Annual Meeting's General Session packet.

Old Business

The committee proceeded to discuss issues pertaining to the labeling of mineral and vitamin units as detailed in Attachment A. As an outcome of the discussion, a workgroup was established to evaluate the proposed revisions to labeling of mineral and vitamin units, as well as label unit nomenclature used throughout the Model Bills and Regulations. Individuals designated to serve on the workgroup were: Mr. Ziehr (chair), Ms. Catherine Alinovi, Ms. Campbell, Ms. Mills and Ms. Thompson.

New Business

The committee proceeded to consider new business.

- 1) Regulation 2(b) (Attachment B)
Mr. Burkholder moved that the Model Bills and Regulations Committee reinsert language as indicated in Attachment B into the AAFCO Model Bill that had been previously and erroneously omitted and that the AAFCO Board of Directors review the proposed reinsertion for future consideration by the Association membership.
The motion was seconded by Mr. Bowers. The committee approved the motion by a voice vote.
- 2) Regulation 4(d)(3) (Attachment C)
Mr. Burkholder moved that the Model Bills and Regulations Committee delete language as indicated in Attachment C from the Model Bills and Regulations and that the AAFCO Board of Directors review the proposed deletion for future consideration by the Association membership.
The motion was seconded by Mr. Ziehr. The committee approved the motion by a voice vote.
- 3) PFC Definitions (Attachment D)
Mr. Bowers moved that the Model Bills and Regulations Committee accept revisions to the Pet and Specialty Pet definitions as indicated in Attachment D and that the AAFCO Board of Directors review the proposed revisions for future consideration by the Association membership.
The motion was seconded by Mr. Ziehr. The committee approved the motion by a voice vote.
- 4) Regulation PF4(a). Expression of Guarantees and Descriptive Terms (Attachment E)
Mr. Ziehr moved that the Model Bills and Regulations Committee accept additions and revisions as indicated in Attachment E and that the AAFCO Board of Directors review the proposed additions and revisions for future consideration by the Association membership.
The motion was seconded by Mr. Bowers. The committee approved the motion by a voice vote with Mr. Burkholder abstaining.
- 5) Regulation PF10. Descriptive Terms (Attachment F)
Mr. Bowers moved that the Model Bills and Regulations Committee accept the additions as indicated in Attachment F and that the AAFCO Board of Directors review the proposed additions for future consideration by the Association membership:
The motion was seconded by Mr. Ziehr. The committee approved the motion by a voice vote with Mr. Burkholder abstaining.
- 6) SUIP 30, Dried Insects for Wild Bird Food (Attachment G)
Mr. Ten Eyck moved that the Model Bills and Regulations Committee accept the proposed Standard Uniform Interpretation and Policy (SUIP) for inclusion in the *Official Publication* as indicated in Attachment G and that the AAFCO Board of Directors review the proposed addition for future consideration by the Association membership.
The motion was seconded by Mr. Bowers. The committee approved the motion by a voice vote.

Assignments/Homework

Labeling of Mineral and Vitamin Units: Chairman Lueders requested that the workgroup established to review labeling of mineral and vitamin units, as well as other label unit nomenclature, evaluate relevant issues and report to the committee at the 2018 midyear AAFCO meeting.

Adjournment

Mr. Lueders asked whether there was any other business to be considered by the committee. Given that none was identified, the committee meeting was adjourned at 2:45 p.m.

On behalf of the Model Bills and Regulations Committee, I respectfully submit this report and request acceptance of the report and recommendations by the AAFCO Board of Directors and the Association Membership.

Attachment A

From: Ben L. Jones [mailto:blj@otsc.tamu.edu]
Sent: Wednesday, August 17, 2016 4:19 PM
To: Lueders, Doug (MDA) <doug.lueders@state.mn.us>
Subject: RE: MB Inconsistency

Doug,

I'm not sure to which preference you refer. How to move forward in the AAFCO process or which way to fix the inconsistency? I would be in favor of changing Model Regulation 4(c) to mirror the intent of 4(b)(3). Something like:

(c) Vitamin Guarantees

- (1) Guarantees for minimum vitamin content of commercial feed shall be listed in the order specified and are stated in mg/lb unless otherwise specified.
 - (I) Vitamin A, other than precursors of vitamin A, in International Units per pound.
 - (II) Vitamin D-3 in products offered for poultry feeding, in International Chick Units per pound.
 - (III) Vitamin D for other uses, International Units per pound.
 - (IV) Vitamin E, in International Units per pound.
 - (V) Concentrated oils and feed additive premixes containing vitamins A, D, and/or E may, at the option of the distributor be stated in units per gram instead of units per pound.
 - (VI) Vitamin B-12, in milligrams or micrograms per pound.
 - (VII) All other vitamin guarantees shall express the vitamin activity in milligrams per pound in terms of the following: menadione; riboflavin; d-pantothenic acid; thiamine; niacin; vitamin B-6; folic acid; choline; biotin; inositol; p-amino benzoic acid; ascorbic acid; and carotene.
- (2) Products labeled with a quantity statement (e.g. tablets, capsules, granules, or liquid) may state vitamin guarantees in milligrams per unit (e.g. tablets, capsules, granules, or liquids) consistent with the quantity statement and directions for use.

Just an example of a possibility.

Thanks,
BLJ

From: Lueders, Doug (MDA) [mailto:doug.lueders@state.mn.us]
Sent: August 15, 2016 12:30 PM
To: Ben L. Jones <blj@otsc.tamu.edu>
Subject: RE: MB Inconsistency

Ben,

I do not disagree. What would your preference be? I'm actually surprised that AFIA didn't pick up on that. I wish that I knew what the rationale was back in the day.

Regards,

Doug Lueders, Manager
Minnesota Department of Agriculture
Commercial Feed Regulatory Program
Phone 651-248-4450
Fax 651-565-5488
E-mail doug.lueders@state.mn.us
Web Site <http://www.mda.state.mn.us/feed>

From: Ben L. Jones [blj@otsc.tamu.edu]
Sent: Monday, August 15, 2016 11:42 AM
To: Lueders, Doug (MDA)
Subject: MB Inconsistency

Doug,

Recently discovered what I see as an inconsistency in a section of the model regulations under the model bill and the model pet food regulations. At least may deserve consideration and discussion.

Regulation 4. Expression of Guarantees

4(b)(3) Mineral Guarantees allows for the expression of mineral guarantees in mg/unit (e.g. tablets, capsules, granules, or liquids) consistent with the quantity statement and directions for use.

4(c) Vitamin Guarantees allows for the expression of vitamins in mg/lb or units consistent with those employed for the quantity statement unless otherwise specified.....and then lists some specific expressions for certain vitamins, implying that those specific expressions cannot be guaranteed in mg/unit.

Regulation PF4. Expression of Guarantees

PF4(c)(3) allows for expression of minerals in mg/unit.

PF4(d)(3) allows for expression of vitamins in mg/unit.

You may ask..."so what?" So, if a companion animal, say horse, product is in a tablet, capsule, granule, or liquid form, they can guarantee minerals in an mg/unit form, can guarantee some vitamins in mg/unit, but cannot guarantee all the vitamins in an mg/unit form. Makes it difficult to convey information to the consumer in a consistent manner.

Your thoughts?

Thanks,

Ben Jones, Associate Director
Office of the Texas State Chemist
P.O. Box 3160
College Station, TX 77841
(979) 845.1121 phone
(979) 845.1389 fax
blj@otsc.tamu.edu

Attachment B

Missing info since the current Model Bill rewrite in 1994 from the previous Uniform State Feed Bill Model Regulations

Regulation 2. Label Format

(a)

(b) Label information is to be placed as follows.

Attachment C

Regulation 4(d)(3) Labels for commercial feeds containing growth promotion and/or feed efficiency levels of antibiotics, which are to be fed continuously as the sole ration, are not required to make quantitative guarantees except as specifically noted in the Federal Food Additive Regulations for certain antibiotics, wherein, quantitative guarantees are required regardless of the level or purpose of the antibiotic.

Attachment D

Pet, Specialty Pet, Pet Food and Specialty Pet Food Definitions

Recommendations

The PFC recommends and moves the revised Pet and Specialty Pet definitions as displayed below to the Model Bill and Regulations Committee for their consideration.

The following definitions appear on page 106 of the 2017 AAFCO OP in the Model Bill and Regulations.

- (q) The term “pet food” means any commercial feed prepared and distributed for consumption by pets.
- (r) The term “pet” means dog (*Canis familiaris*) or cat (*Felis catus*).
- ...
- (v) The term “specialty pet” means any animal normally maintained in a household, such as, but not limited to, rodents, ornamental birds, ornamental fish, reptiles and amphibians, ferrets, hedgehogs, marsupials, and rabbits (non-production, non-livestock).
- (w) The term “specialty pet food” means any commercial feed prepared and distributed for consumption by specialty pets.

Attachment E

The PFC recommends and moves the following addition and revisions to AAFCO Model Regulation PF4(a) on p. 139 of the 2017 Official Publication (OP) to the Model Bill and Regulations Committee for their consideration.

Regulation PF4. Expression of Guarantees

- (a) The “Guaranteed Analysis” shall be listed in the following order and format unless otherwise specified in these Regulations:
 - (1) ...
 - (2) ...
 - (3) When listed on the label of a dog or cat food product, guarantees for dietary starch and sugars shall be stated as maximum percentages. Neither guarantee shall be listed without the other. The guarantee for dietary starch shall follow ash, if also listed; or moisture, if ash is not listed. The guarantee for sugars shall follow dietary starch.
 - ~~(3)~~(4) A dog or cat food label shall list other required or voluntary guarantees...
 - ~~(4)~~(5) A specialty pet food label shall list other required or voluntary guarantees...

Attachment F

The PFC recommends and moves the following additions to AAFCO Model Regulation PF10 on p. 147 of the 2017 OP to the Model Bill and Regulations Committee for their consideration.

Regulation PF10. Descriptive Terms

- (a) Calorie Terms...
- (b) Fat Terms...
- (c) Carbohydrate Terms
 - (1) "Low" Carbohydrate, Dietary Starch and Sugars Claims
A claim of "low carbohydrates", "low dietary starch", "low sugars" or a combination thereof is not allowed.
 - (2) "Less" or "Reduced" Carbohydrates, Dietary Starch and Sugars claims.
 - A. A dog or cat food product which bears on its label a claim of "less _____" or "reduced _____" (blank is to be completed by using "carbohydrates", "dietary starch" or "sugars") or words of similar designation, shall include on the label:
 - i. The name of the product of comparison and the percentage of reduction in total dietary starch plus sugars (expressed on an equal weight basis) explicitly stated and juxtaposed with the largest or most prominent use of the claim on each panel of the label on which the term appears; and
 - ii. The comparative statement printed in type of the same color and style and not less than one-half the size used in the claim; and
 - iii. Maximum guarantees for dietary starch and sugars as stated in Model Regulation PF4(a)(3).
 - B. A comparison between products in different categories of moisture content (i.e., less than 20%, 20% or more but less than 65%, 65% or more) is misleading.

Attachment G

Good morning,

Kristi Smedley and I took the comments regarding dried insects in wild bird food, into consideration and have drafted the following SUIP for Model Bill Committee to review.

30. Dried Insects for Wild Bird Food - Insects, all life stages, that are commonly found in the wild as North American wild bird food sources may be reared and dried for use in commercial wild bird feed.

These insects are considered common food. The dried insects must be feed grade. The label must include the appropriate common name of the insect. Example: Black Soldier Fly Larvae

There is no intention to circumvent the ingredient definition process. Based upon discussions with CVM and the IDC Chair, it has been recognized that wild birds have a plethora of options for food sources that are not limited to commercially produced animal food. Larvae and insects that are found in North America are a staple part of the wild bird food diet and should likely pose no safety risk when offered in commercial bird seed mixes and suet cakes, provided the dried insects are feed grade (not adulterated). Please consider the opportunity to list the dried insect larvae and dried insects for wild bird food use only in a Statement of Uniform Interpretation and Policy to ensure the regulators and industry have a standard to follow.

Many thanks,
Erin Bubb | PA Department of Agriculture
Bureau of Plant Industry
717-772-5215

Pet Food Committee Report
2017 AAFCO Annual Meeting
August 11, 2017, Bellevue, Washington

Committee Recommendations: None

Board Recommendations: Report approved on October 25, 2017

Association Actions: None

Committee Participants

Members Present: Kristen Green (Chair, KY), Stan Cook (Vice-Chair, MO), Liz Higgins (NM), Kristen Hamilton (ID), Lizette Beckman (WA), Jason Schmidt (LA), George Ferguson (NC), James Embry (TX), Tiffany Leschishin (MN), William Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM), Kathleen Close (FDA-ORA), Austin Therrell (SC). Present via phone: Nathan Price (ID)

Advisors Present: Leah Wilkinson (AFIA), Pam Kaufmann (AFIA), Dave Dzanis (APPA and ACVN), Susan Thixton (AFTP), David Fairfield (NGFA), David Meeker (NRA), Angele Thompson (PFI), Chris Cowell (PFI). Present via phone: Jean Hofve (PWA), Mollie Morrisette (PWA)

Committee Report

Motion to disband the Pet and Specialty Pet Food Definition Working Group. Moved by Liz Higgins (NM) and seconded by Bill Burkholder (FDA-CVM). Motion Passed.

Motion to recommend a working group for reviewing whether the AAFCO Dog Food Feeding Protocols need updating to account for the changes to the AAFCO Dog Food Nutrient Profiles relevant to growth of large size dogs. Moved by Liz Higgins (NM) and seconded by Austin Therrell (SC). Motion Passed.

Motion to form a workgroup to review and update the Business of Pet Food website and AAFCO Talks Pet Food website. Moved by Stan Cook (MO) and seconded by Kristin Hamilton (ID). Motion Passed.

Committee Minutes

Announcements

Meeting called to order at 2:00 pm. Kristen Green (KY) welcomed new members to the committee: Kathleen Close (FDA-ORA), Suzanne Riddle (MO) and Tiffany Leschishin (MN). Christie Shee (formerly IN) has left the Office of the Indiana State Chemist to pursue other opportunities.

Working Group Reports:

Pet and Specialty Pet Food Labeling Workshop

The 1.5 day Pet Food and Specialty Pet Food Labeling Workshop is full and will be held at the end of the AAFCO annual meeting. Due to a high level of interest in the Workshop, another 1.5 day workshop is being planned to be held directly after the midyear meeting in Anaheim, CA. The workshop will be held starting at 1 pm on Wednesday January 24th, 2018. Attendance will again be limited based on hotel restrictions. The workshop will be formally announced and registration opened this fall.

Definitions of Pet and Specialty Pet Working Group

The Model Bill and Regulations committee passed a slightly modified version of the Pet and Specialty Pet and Pet Food definitions during their annual meeting. The workgroup was dissolved during the meeting.

AOAC Sugars Method Validation Update

This method has been developed and published and is available for use as it continues through the formal AOAC process. The method is being validated to become an AOAC official method, a process that may be completed by March, 2018.

Discussion Items:

Dental Claims

The revised Guidelines for Dental Related Claims were passed by the general membership and are now final. They will appear in the 2018 AAFCO OP.

USDA – AMS Human Grade Process Verified Audit

Tabatha Milligan with Perdue Food LLC presented an option being explored as a way to substantiate human grade claims: development of USDA Agricultural Marketing Service (AMS) Process Verified Program (PVP). See Appendix A.

Companies could be certified in one of two ways:

- 1) Process Verified Programs - AMS would certify that a firm meets the requirements of CFR 117 checklist and also complies with QAD 1000, QAD 1001 requirements. PVP certification allows the company to utilize the Process Verified shield and terms on packaging/POS and approved facility website.
- 2) Quality System Assessment (QSA) AMS would certify QAD 1002 program for compliance with the audit checklist. Company would not be eligible to utilize AMS process verified shields or claims on package.

The next step involves getting feedback from states as to whether they would accept this process or one like it to verify human grade claims. No official AAFCO action needs to be taken at this time.

Updating AAFCO Feeding Protocols to Account for Growth of Large Size Dogs

With the revisions made to the AAFCO Dog Food Nutrient Profiles, it was requested that PFC review the AAFCO Feeding Protocols to ensure the protocols provide appropriate substantiation [in particular for growth of large size dogs (70 lb or more as an adult)]. For example – if a firm is going to make a claim for growth of large size dogs for a product based on a feeding trial, then a firm should use large size dogs in the feeding trial. Workgroup formed, consists of: William Burkholder (FDA-CVM), Angele Thompson (PFI), Dave Dzanis (APPA, ACVN), Cathy Alinovi (NGPFMA), Kristin Hamilton (ID), Austin Therrell (SC), Tiffany Leschishin (MN)

GAPFA Request Regarding Maximum Vitamin A Levels in Growing Dogs

PFC received a letter from the Global Alliance of Pet Food Associations (GAPFA) requesting the committee evaluate raising the maximum levels of Vitamin A in the Nutrient Profiles for growing and reproducing dogs. GAPFA has requested in the past that AAFCO consider harmonizing with the FEDIAF guidelines for nutrient requirements in pets. The committee voted to form a working group to start looking at the information provided by GAPFA regarding the maximum Vitamin A level. It should be noted that PFC does not intend to start a nutrient-by-nutrient review of inconsistencies between the FEDIAF and AAFCO nutrient profiles. Members of the working group were not set in the meeting; instead the Chair of PFC will determine the composition of this workgroup and communicate this information to PFC members.

Updating the Business of Pet Food and AAFCO Talks Pet Food Websites

There was a brief discussion regarding the need to continually review and update these AAFCO websites to reflect changes in the Pet Food Model Bill and Regulations. PFC voted to form a workgroup to review and update these sites on an annual basis. Due to time constraints, members will be identified after the meeting.

Discussion of PF3e

There was not time in the agenda to address this item. The topic may be considered for another meeting.

Pet Food Label Modernization Discussion – Stan Cook, MO Dept. of Agriculture

The label modernization project is a major focus for PFC and the work will increase over the coming year. Subgroups of this workgroup have been meeting and making progress. The four subgroups presented on progress and accomplishments made within each group.

Nutritional Adequacy/Feeding Directions – Jo Lynn Otero, NM Dept of Ag presented by Angele Thompson (PFI)

This group thought a front of package symbol might provide quick access for simple nutritional adequacy information for consumers. Various iterations of symbols were evaluated that would provide the needed information in a clear manner. This symbol is not intended to replace the nutritional adequacy statement but will be on the front panel of the product label. The group displayed different symbols for complete and balanced (circle) and supplemental feeding (rectangle). Placement on the principal display panel (PDP) was also discussed – top, bottom, right or left. The consensus on placement was that the lower right quadrant of the PDP would be most visible to the consumer. The group has also considered the size of the symbol relative to the area of the PDP for both the circle and the rectangle. The symbols would be available to companies on the AAFCO website for download so the symbols would be uniform

across the industry. The group would like to see these symbols, their placement and their size included in the consumer survey.

Feeding Directions: Goal is to provide education to help consumers make better feeding choices. The group discussed creation of an AAFCO URL and/or website to give additional information to consumers on how to better interpret feeding directions. The group discussed that feeding directions are only guidelines. There are other factors to consider such as Body Condition Score as a way of determining pet's nutritional status, and that the fact that treats create an additional source of calories which need to be accounted for in a pet's overall diet. The group discussed and reached consensus to not mandate more detailed feeding directions on products intended for growing animals. Consensus has not been reached on other aspects of the Feeding Directions and the group is still open to comments from stakeholders. Work on regulation revisions has started, most of which are in PF7. There have not yet been proposed changes to PF8 – Feeding Directions.

The group thanked Jim Barritt with Mars for his generous help in generating multiple rounds of graphics.

Safe Handling and Storage Statement - Lizette Beckman (WA)

This group has considered statements to address safe handling and storage, possible cross contamination situations and safe handling by type of product like raw, dry, chews and cans. The group is still considering a couple of questions. Should a safe handling statement be required on all package sizes? Should safe handling statements be required on all types of products and is there sufficient evidence of risk to support that? The group has requested that the FDA address questions regarding safety risk associated with various types of products.

Pet Nutrition Facts Box - Jason Schmidt, LA Dept of Ag

This group has changed the title of the box from "Nutrition Facts" to "Pet Nutrition Facts" to differentiate from human foods. The group has discussed and included information to address: nutrient density, intended use, calorie statement, calories by nutrient type, and nutrients guaranteed per cup.

The group has also been discussing which nutrients should be guaranteed. Crude fiber is considered an outdated guarantee, and the consensus of the team is that total dietary fiber would be a more relevant guarantee for fiber. The group has had calls and discussed the need for additional calls with subject matter experts Dr. George Fahey and Dr Leslie Hancock.

This group has had several meetings and gone through 35 iterations of the Pet Nutrition Facts box and would like to thank to Jim Barritt of Mars Pet Food for the work on the graphics.

Ingredients - Richard Ten Eyck, OR Dept of Ag

The big picture ideas that the group has been working on include:

- Clarifying the ingredient list for consumers
- Pulling regulatory language from Human Food CFR's
- Codifying normal allowances for label review
- "Villain" ingredient names

Devilish Details:

- 2% grouping for ingredients of less than 2% in formula
- Vitamin and mineral naming (discuss common name solutions)
- Ingredients shall be listed and identified by the common name - still needs to be run by the workgroup
- Order of predominance of ingredients
- 'May contain' approach as used in human foods
- Common and usual ingredient names defined

Comments were made that there is not consensus in this work group and that previously regulators, FDA and industry have made comments that have not been addressed or acknowledged publically by the group.

There was discussion regarding the importance of providing relevant information on the labels for consumers that is communicated in a clear, transparent and useful manner. Do we need more ingredients to talk about the source of the meat ingredients? David Meeker (NRA) suggested that additional ingredient definitions could be created in the animal protein products section to distinguish "premium" or "pet food grade" ingredients from the existing definitions.

There was discussion regarding use of the word “pet feed” rather than “pet food” for products that don’t meet the human grade definition. FDA indicated that the agency has been moving away from the term “feed” and toward “food” for all animal food.

Comment received from the floor regarding the inclusion of percentages in the ingredient statement to provide additional information to consumers.

Next steps for the all groups include:

- Reach consensus of the concepts
- Survey to ensure that label communication to consumers is clear
- Convert concepts to regulatory language
- Pet Food Committee approval
- Model Bill & Regulations Committee approval
- General Membership vote

Moved to adjourn by Stan Cook (MO) seconded by Liz Higgins (NM)

Pet Food Committee adjourned at 5:10 pm

Appendix A: Presentation by Tabatha Milligan of Perdue Foods, LLC

Human Grade Verification

AAFCO ANNUAL MEETING

Human Grade Verification Program

- ▶ In the 2017 AAFCO guidelines required industry to provide support of compliance to CFR 117.
- ▶ Challenge has been getting a government certification that will be accepted by all states in support of compliance to CFR 117. Currently no specific voluntary audit for compliance to CFR 117 is available.

Possible Solution

- ▶ The Agricultural Marketing Service's (AMS) branch of the United States Department of Agriculture (USDA) conducts multiple audits for various programs in support of product claims for the human foods industry. The Quality Assessment Division (QAD) completes these audits with trained staff of dedicated auditors.

Human Grade Verification Program

- ▶ AMS would audit industry programs based on the CFR 117 standards checklist to certify that pet food producers making Human Grade claims on pet products are in compliance with 117 and are using only human edible ingredients.
- ▶ Companies could be certified in one of two ways;
 - ▶ **Process Verified Program** – AMS would certify that a firm meets the requirements of CFR 117 checklist and also complies with QAD 1000, QAD 1001 requirements. PVP certification allows the company to utilize the Process Verified shield and terms on packaging/POS and approved locations are listed on the AMS PVP approved facility website.
 - ▶ **Quality System Assessment (QSA)** - AMS would certify QAD 1002 Program for compliance with the audit checklist. Company would not be eligible to utilize AMS process verified shields or claims on packages

Proficiency Testing Program Committee Report

2017 AAFCO Annual Meeting
August 10, 2017, 1:30 pm – 5:30 pm, Bellevue, Washington

Committee Recommendations: Raise prices 25% for all 4 scopes to start in 2018

Board Recommendations: None

Association Actions: None

Committee Participants

Brenda	Snodgrass	AAFCO PTP/OK Dept. of Ag	pt@aafco.org	Chair – PM
Louise	Ogden	AAFCO PTP	pt@aafco.org	Vice Chair – QM
Nancy	Thiex	AAFCO PTP	nancy.thiex@gmail.com	Manager
Deepika	Curole	LSU Dept. of Ag. Chem.	dcurole@ldaf.state.la.us	Member
Teresa	Grant	NC Dept. of Ag	teresa.grant@ncagr.gov	Member
Tai	Ha	NE Dept. of Ag	tai.ha@nebraska.gov	Member
Mary	Koestner	MO. Dept. of Ag	mary.koestner@mda.mo.gov	Member
Patty	Lucas	FL Dept. of Ag. & Cons. Serv.	patricia.lucas@freshfromflorida.com	Member
Aaron	Price	CFIA	aaron.price@inspection.gc.ca	Member
Frank	Sikora, Ph.D.	AAPFCO (Magruder)	fsikora@uky.edu	Member
Michele	Swarbrick	MN Dept. of Agriculture	michele.swarbrick@state.mn.us	New Member 08/2017
Lei	Tang, Ph.D.	FDA/CVM	lei.tang@fda.hhs.gov	New Member 08/2017
Sharon	Webb, Ph.D.	UK Div. of Reg. Serv.	sharon.webb@uky.edu	Member

Advisors Present

Dan	Berg	Covance Labs	Dan.berg@covance.com	Advisor
Andy	Crawford, Ph.D	AAFCO PTP	andy@crawford.org	Statistician & Advisor
Lars	Reimann	Eurofins	larsreimann@eurofinsus.com	Advisor
Ken L.	Riter, Ph.D.	Nestle Purina Analytical Labs	ken.riter@purina.nestle.com	Advisor

Committee Report

- 1) Call to Order
- 2) Review and Approval of Agenda
 - A) Approved with modifications
- 3) Introductions and Sign-up Sheet
 - A) Added Michele Swarbrick and Lei Tang as members to the committee.
- 4) Program Leadership and Administrative Update
 - A) Update committee description in AAFCO Procedures Manual
 - i) Description of Committee has been updated to reflect the name change as well as other editorial changes. The Committee approved the changes unanimously.
 - ii) Submit to Strategic Affairs Committee
 - B) Accreditation update
 - i) Mycotoxins and Minerals
 - a) Louise Ogden reported that AAFCO PTP (Nancy and Louise) inspected the facilities as part of a GAP analysis and suggested some changes but it seemed very likely that they would approve the Mycotoxin program. The goal is to have the program approved in early 2018.
 - b) Minerals will be added to the scope by early September 2017. Documentation was submitted to ANAB in July 2017 and has been reviewed. No deficiencies were noted.

- C) EPTIS Database: Louise also reported that the EPTIS Database lists PT programs available throughout the world including listing the AAFCO programs under Animal Feed. Dr. George Latimer is the project's manager here in the US.
- D) Following the discontinuance of FDA support the prices for the PT program will have to increase. It is the intent to keep the program "affordable". Increases expected to be \$440 for the feed program and \$300 for the quarterly programs starting with the 2018 season. It was agreed to review the program's financial performance prior to future increases. Program leadership is currently
 - Chair: Brenda Snodgrass
 - Vice-Chair: Louise Ogden
 - Statistician: Andy Crawford
- i) There was discussion about the increases. Future increases will be requested when needed. At this time, it should not be an annual increase.
 - ii) Need to cover the cooperative agreement costs for accreditation and contract costs.
 - iii) Motion approved.
 - iv) Recommendation will be presented to Board.
- E) Survey
 - i) Upcoming survey – Pet Food - It was agreed to postpone the pet food related survey to early 2018.
 - a) After the mid-year meeting
 - ii) Survey Results –
 - a) Mycotoxin Contaminants – 28 people responded to the survey addressing mycotoxins with mixed responses. The mycotoxin program is very popular. It was suggested to include raw ingredients in the program but others felt raw ingredients were covered well by the AOCS programs. There seemed to be consensus on running 1 sample of DDGS. The challenges of finding samples with incurred mycotoxin content was restated.
 - b) DDGS will be the 4th quarter round – also look at corn gluten-meal and other by-products (Lars) – or pay for a 5th test item. For this year – one time exception for 2017 – 8 labs in addition to regular participants are interested in the DDGS
 - c) Discussion about methods to be used for DDGS – referred to AAFCO Laboratory Methods & Services Committee Mycotoxins Best Practices Working Group.
 - d) Kits versus Mass Spec
- 5) Program Summary
 - A) Program Participation Report – current enrollment
 - B) Feed: 160-200+ labs submitting results in the feed scheme.
 - C) Pet Food: There are approx. 55 active participants in the pet food scheme except for those samples shared by both the pet food and the feed groups.
 - D) Minerals: now has around 30 participants.
 - E) Mycotoxins: There are approx. 40+ participants in the mycotoxin scheme. Trilogy prepares the samples by mixing incurred samples with blank material.
 - F) Homogeneity testing, minerals – Homogeneity studies have been performed on mineral samples which supported a homogeneity claim.
 - G) Feed
 - i) Stability – Andy Crawford discussed stability related testing. Some labs use AAFCO PT samples as internal control samples and analyze them for the same target analyte multiple times over a period of time. He had received 42 such studies that indicated good stability for specific analytes. He stressed the need for identifying "challenging" analytes and collect stability data on those in order to meet the accreditation body's expectations.
 - ii) Special analytes or special matrix
 - H) Incorporation of Veterinary Drugs
 - i) Veterinary Drug Residues
 - ii) Reporting
 - I) Pet Food Program

- Special analytes or special matrix (Energy source/animal or plant based; carbohydrate), It was suggested to include sweet potato, salmon meal, high protein, high fiber, natural matrix and poultry meal among the pet food program matrices for 2018.
- J) Mycotoxin Program
 - i) Special analytes or special matrix – DDGS – 4th quarter of 2017 Program year
 - a) Approximately 10 X the current concentration range
 - K) Minerals Program
 - i) Special analytes or special matrix – Speciation
 - a) Nancy & Lars – How many labs are doing speciation? What elements? What's critical? Oxidation states/forms. A speciation focus may be added to this program sometime in the future (e.g., As, Cr, ...). Louise asked “do the Feed Control Officials want this and is FDA requiring it? This is a huge undertaking and we need to have a large group participating.” More specific requirements and details will need to be presented to the PTP committee before we proceed with this addition.
- 6) Presentation: Review of AAFCO AV Limits – K. Fischer, Office of the Texas State Chemist - presented a comparison of AAFCO AV's with the CV's collected from the PT program. Plot indicated that many AV's were lower than CV's observed from the PT program. The suggestion was made that AV's have outlived their usefulness and should be removed from the AAFCO manual. Instead the regulators should rely on “investigational allowances”.
 - A) Liquid feeds – Monica Naylor commented that AAFCO does not have a liquid PT in the rounds – the AVs need to take liquid methods into account.
 - B) Committee is “in charge” of the AVs, Uncertainty & ISO
 - i) Nancy – AVs are out dated and recommends these should be taken out of the Official Publication.
 - ii) Bill Hall – suggested using the “investigational allowance” approach as used for fertilizer (AAPFCO).
 - iii) Frank Sikora – how many labs have their uncertainties calculated – suggests these should be published by the labs.
 - iv) Lars – The AVs are estimated and not necessarily for that particular sample (matrix).
 - 7) Promotional efforts – AAFCO Proficiency Testing Programs – N. Thiex and L. Ogden, Aaron
 - A) PowerPoint - Other PT Committee members could present. To Do – I will send out email to the members/others
 - 8) Future Program Improvements – B. Snodgrass and L. Ogden
 - A) Louise requested three volunteers from Federal, State and Industry to assist with updating the methods list. Louise will email members after meeting for volunteers.
 - B) Moving the quarterly schemes to a staggered schedule starting 2018. Mycotoxins in Jan., Pet Food in Feb. and Minerals in March. Approved by the committee.
 - C) In response to several requests it was mentioned that incorporating results of “<LOQ” would require the re-writing of the program incurring a significant expense.
 - 9) Roundtable
 - A) Aaron – Canada ISO Accreditors are requiring labs to report < than the LOD – can't report 0 – want to have the ability to do the < as on the mycotoxin reports. PTP Response - we would have to rewrite the program. FASS and statistician would have to reprogram to capture the data. This would be a major overhaul of the statistical analysis and reporting system.
 - B) Aaron – problems getting AAFCO PT Test Items across the border. Brenda and Louise asked Aaron to assist in getting the proper language and documentation to be sent with Canadian shipments.
 - C) Non-Protein Nitrogen (NPN)
 - i) Casey Guccione – The NPN data is of concern. Labs do not appear to be reporting the results correctly. Equivalent crude protein is listed on the label but report is for % Nitrogen.
 - ii) Michele Swarbrick – can we add a method code for the ECP?
 - iii) Nancy Thiex– discussed why – label claim is only one slice of the pie.
 - iv) Sharon Webb – have Lab Service Committee write the paper – referred to the AAFCO Laboratory Methods & Services Committee;

- v) Sara Williams – obvious blunders. The PT Program statistician removes obvious blunders when evaluating data sets.
- D) Heidi - Number samples – drop from 12 rounds a year to 6 rounds for Animal Feed. To help with costs over the next few years – This may be something to consider in the upcoming years.
- E) Dietary starch code – 412.01- Nancy – labs are missing this code and not reporting. Wants this moved to the “12” Starch series. Brenda asked if the dietary starch is different than starch and that’s why it’s separated.
- 10) Adjournment

Action Item Table

Responsible	Item	Action	Timing / Status
Brenda	AAFCO Procedures Manual Update	Description of Committee has been updated to reflect the name change as well as other editorial changes. Present to Strategic Affairs Committee	October 2017/open
Brenda	25% price increase for 4 schemes	Present to board for approval	October, 2017/open
Brenda	Change matrix to DDGS to 4 th quarter mycotoxins	Contact Trilogy of change. Move original 4 th quarter to 2018 1 st quarter. Invite additional labs that expressed interest in analyzing.	September 2017/in progress
Louise	Create AAFCO PTP PowerPoint	Develop a PowerPoint that committee members could present at local AOAC & other meetings as a marketing tool	Before December 2017/Open
Louise	Update method code list	Email members for volunteers to assist in the update.	Before December 31, 2017/In process
Brenda	Canadian Customs Regulations	Ask Aaron for the requirements to ship test items into the country.	September 2017/Request sent to Aaron
Brenda	Dietary starch code	Resolve dietary starch code confusion	Before December 31, 2017/In process

Meeting Attendees

First	Last	Affiliation	Email	Title
Jenny	Baillie	Milk Specialties	jbailie@milkspecialties.com	
Linda	Benjamin	FDA/CVM	Linda.benjamin@fda.hhs.gov	
Dan	Berg	Covance Labs	Dan.berg@covance.com	Advisor
Julie	Brunkhorst	Trilogy Labs	julie@trilogylab.com	
Jane	Caldwell	Midwest Labs	jcaldwell@midwestlabs.com	
Angela	Carlson	SGS North America	angela.carlson@sgs.com	
Andy	Crawford, Ph.D.	AAFCO PTP	andy@crawford.org	Statistician & Advisor
Deepika	Curole	LSU Dept. of Ag. Chem.	dcurole@laf.state.la.us	Member
Manisha	Das Ph.D.	FDA/CVM	Manisha.das@fda.hhs.gov	
Kelly	Davis	Renewable Fuels Association	kdavis@ethanolrfa.org	
Tim	Edwards	Spectrum Brands	tim.edwards@spectrumbrands.com	
Leticia	Fidalgo Buron	MPM Products Ltd	leticia.fidalgo.buron@mpmproducts.com	
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Sally	Flowers	NE Dept. of Ag	sally.flowers@nebraska.gov	
Mark	Frampton	MPM Products Ltd	mark.frampton@mpmproducts.com	
Paul	Frankforther	Vitakraft Sunseed	paul.frankforther@vitakraft.us	
Teresa	Grant	NC Dept. of Ag	teresa.grant@ncagr.gov	Member
Casey	Guccione	KS Dept. of Ag	Casey.Guccione@ks.gov	
Tai	Ha	NE Dept. of Ag	tai.ha@nebraska.gov	Member
Bill	Hall	Mosaic	bill.hall@mosaicco.com	
Dan	Hengst	Covance Labs	dan.hengst@covance.com	
Heidi	Hickes	MT Dept. of Ag	hhickes@mt.gov	
Jean	Hobus	Central Garden & Pet	jhobus@central.com	

First	Last	Affiliation	Email	Title
Jeff	Horst	Agri-King	jeff.horst@agriking.com	
Dorota	Inerowicz	OISC	inerowicz@purdue.edu	
Barbara	James	Potash Corp	bjames@pcspophosphate.com	
Solomon	Kariuki	UKY Reg. Serv.	s.kariuki@uky.edu	
Brenda	Keavey	WV Dept. of Ag	bkeavey@wvda.us	
Mary	Koestner	MO. Dept. of Ag	mary.koestner@mda.mo.gov	Member
Dominika	Kondratko	CO Dept. of Ag	dominika@kondratko@state.co.us	
Philippe	Lamarche	Jefo Nutrition	plamarche@jefo.ca	
Joyce	Lewis	LA Dept. of Ag & Forestry	jlewis@ldaf.state.la.us	
Hui	Li, Ph.D.	FDA/CVM	hui.li@fda.hhs.gov	
Patty	Lucas	FL Dept. of Ag. & Cons. Serv.	patricia.lucas@freshfromflorida.com	Member
Kristi	McCallum	CO Dept. of Ag	kristina.mccallum@state.co.us	
Quintin	Muenks	MO Dept. of Ag	quintin.muenks@mda.mo.gov	
Lauren	Myers	Spectrum Brands	lauren.myers@spectrumbrands.com	
Monica	Naylor	Westway Feed	monica.naylor@westwayfeed.com	
Louise	Ogden	AAFCO PTP	pt@aafco.org	Vice Chair – QM
Aaron	Price	CFIA	aaron.price@inspection.gc.ca	Member
Chris	Quinones	Spectrum Brands	christopher.quinones@spectrumbrands.com	
Ron	Reid	Vitakraft Sunseed	ron.reid@vitakraft.us	
Lars	Reimann	Eurofins	larsreimann@eurofinsus.com	Advisor
Ken L.	Riter	Nestle Purina Analytical Labs	ken.riter@purina.nestle.com	Advisor
Dora	Rodriguez	Jefo Nutrition	drodriguez@jefo.ca	
Frank	Sikora, Ph.D.	UK Div. of Reg. Serv.	fsikora@uky.edu	Member
Brenda	Snodgrass	AAFCO PTP/OK Dept of Ag	pt@aafco.org	Chair – PM
Michele	Swarbrick	MN Dept. of Ag	michele.swarbrick@state.mn.us	New Member 08/10/17
Lei	Tang	FDA/CVM	lei.tang@fda.hhs.gov	New Member 08/10/17
Nancy	Thiex	AAFCO PTP	nancy.thiex@gmail.com	Manager
Caroline	Trudel	Jefo Nutrition	ctrudel@jefo.ca	
Victoria	Watkins	KS Dept. of Ag	victoria.watkins@kda.ks.gov	
Sharon	Webb, Ph.D.	UK Div. of Reg. Serv.	sharon.webb@uky.edu	Member
Sara	Williams	OTSC	smw@otsc.tamu.edu	
Jeanine	Wooten	WA. Dept. of Ag	jwooten@agr.wa.gov	

Strategic Affairs Committee Report

2017 AAFCO Annual Meeting

August 12, 2017, 10:15 am – 12:00 pm, Bellevue, Washington

Committee Recommendations:

- 1) Report acceptance.
- 2) By-Laws changes Article IV - Section 1 and 2, Article V - Section 1 and Article VI - Section 1 to provide clarification regarding the Nominating Committee, constitution and election of the Board of Directors as well as Officers and vacancies.

Board Recommendations: Report accepted – *add date*

Association Actions: Report accepted – *add date*

Committee Participants

Full Committee Members: *Linda Morrison, Ken Bowers, Richard Ten Eyck, Andy Gray, Erin Bubb**, Jamey Johnson, Doug Lueders**, Shannon Jordre, Ali Kashani, Chad Linton, Mark LeBlanc* (Board Liaison), *Dragan Momcilovic, Jenny Murphy, Aaron Price, Kent Kitade, Nancy Thiex, Robert Waltz*, Vice Chairperson

By-Laws Sub-Committee: Ken Bowers, Erin Bubb, Doug Lueders, Richard Ten Eyck

Committee Advisors: *Dave Fairfield, Dave Dzanis, Bob Ehart, Richard Sellers, Diane Loiselle, Pat Tovey, Kristi Krafka, Ed Rod*

Italic denotes those present at the meeting

**** New members**

Committee Report

- 1) Sub-Committee: By-Laws (Ken)
 - A) Update
 - i) Clarification of Article 5, Section 1. Group have reviewed and obtained legal advice. The draft was shared with the Committee for consideration.
Motion to accept the By-Laws changes as displayed in the Attachment 1: Richard; second Mark; Motion passes.
Action: Forward to Board and membership.
 - ii) Policy on posting eMeeting notices forwarded by Board, which needs clarification from it. Action as necessary at next meeting.
 - 2) Strategic Planning 2017–20
 - A) The detailed activities, timelines, and responsible committee chairs have been entered into the Feed BIN to track progress.
 - B) Committee Chairs were prompted to provide written updates prior to the meeting.
 - C) Key progress was recorded in Attachment 2: Strategic Plan 2017-20 updates from Annual 2018. Edits are in ***bold italic*** text.
Action: The Feed BIN will be updated based on Attachment 2.
 - 3) Other business
 - A) SAC Member and advisor update for 2018
Action: Members and Advisors were asked to provide names to update the Committee list.
 - B) Committee financial needs from the 2018–19 budget: None at this time
- The Committee report will be circulated for a 2 week editorial comment period prior to finalization and submission to FASS for posting.

Motion: To accept the meeting minutes/report: Ken; Second – Mark; Motion carries.

Attachments:

- 1) By-Laws edits
- 2) Strategic Plan 2017-20 updates from Annual 2018

Action Item Table

Responsible	Item	Action	Timing / Status
By-Laws/Ken	Clarification of Article 5, Section 1 needed	Forward to Board for membership consideration at January 2018 meeting.	Changes approved by Committee.
Linda/ Committee Chairs	Strategic Plan priorities 2017-20	Committee Chairs asked to keep Feed BIN updated.	Attachment 2 and Feed BIN updated per August 2017 annual meeting reporting.
Linda/President Elect (Stan)	NOPA advisor	Informed Stan that NOPA needs to be contacted to find out if they want to continue to have an Advisor and if so who.	To meet OP publishing deadline.
Members/ Advisors	2018 Committee list	Members and Advisors were asked to update/confirm names.	September 1, 2017.

Attachment 1

By-Laws of the Association of American Feed Control Officials, Inc.
August 12, 2017

ARTICLE IV

Officers

~~Section 1. Officers. The following officers shall be elected by the membership at each annual meeting by a majority vote of those present and voting, and shall serve for the year beginning January 1 of the next calendar year, and ending December 31:~~

~~President, who shall become immediate Past President of the Association on January 1 of the next calendar year following elections.~~

~~President-Elect, who shall become President of the Association on January 1 of the next calendar year following elections.~~

~~Secretary-Treasurer.~~

Section 1. Officers. The President, President-Elect, and Secretary-Treasurer shall be elected by the membership at each annual meeting by a majority of those present and voting, and shall serve for the year beginning January 1 of the next calendar year, and ending December 31.

~~Section 2. Vacancies. If any office other than that of President or President-Elect shall become vacant, a person shall be appointed by the Board of Directors for the remainder of the term. In the event that the office of the President-Elect becomes vacant, the Board of Directors shall fill the office of President-Elect for the remainder of the term. If the office of President shall become vacant, the President-Elect shall thereupon become President of the Association for the unexpired term provided that such service shall not affect such person becoming President of the Association on January 1 of the next calendar year following elections. In the event that the office of President becomes vacant at a time when the office of President-Elect is also vacant, the Board of Directors shall fill the office of President for the remainder of the term.~~

ARTICLE V

Board of Directors

~~Section 1. Constitution **And Election** of the Board. The Board of Directors shall consist of nine positions including the President, President-Elect, Secretary-Treasurer, Immediate Past President representing the Executive and five (5) other elected Directors. Each of the elected Directors shall be a member designated under Article II, Section 1 and elected at the annual meeting. The five (5) elected Directors shall be nominated to one of two tiers. Tier 1 shall include two (2) Senior Director positions and Tier 2 shall include three (3) Junior Director positions. Tier 1 Senior Directors may serve successive one-year terms and progress into the Executive positions. Tier 2 elected Junior Directors may serve a maximum of two (2) successive one year terms and do not progress into the Executive positions unless voted into a Tier 1 Senior Director position. The President shall serve as Chairman of the Board. No two (2) members of the Board of Directors shall represent the same State, Province, Dominion, District, Territory, Republic, Commonwealth or Federal Agency, except that a Board member may be elected from the same State, Province, Dominion, District, Territory, Republic, Commonwealth or Federal Agency as the Secretary-Treasurer.~~

Section 1. Constitution **And Election of the Board. (i) The Board of Directors shall consist of eight (8) elected individuals: the President, the President-Elect, the Secretary-Treasurer, and five (5) Directors. The Immediate Past President shall serve as a voting, ex-officio member of the Board. Officers and Directors shall be elected at the annual meeting of the voting members for one (1) year terms. In addition to the slate of candidates proposed by the Nominating Committee, any Association member may make additional nominations by submitting them in writing to the Secretary-Treasurer prior to the vote at the annual meeting. (ii) Each of the elected officers and Directors shall be a member designated under Article II, Section 1. No two (2) members of the Board of Directors shall represent the same State, Province, Dominion, District, Territory, Republic, Commonwealth or Federal Agency, except that a Board member may be elected from the same State, Province, Dominion, District, Territory, Republic, Commonwealth or Federal Agency as the Secretary-Treasurer. (iii) The President shall serve as the Chairman of the Board.**

ARTICLE VI

Committees and Investigators

Section 1. Nominating Committee. ~~The Board of Directors shall establish the membership of a Nominating Committee and the conditions and timeframes under which the Nominating Committee shall operate to nominate a slate of candidates for officers and directors for the ensuing year for consideration by the voting members at the annual meeting. After the nominations have been slated and announced, any Association member may make additional nominations by submitting them in writing to the Secretary-Treasurer or make a nomination from the floor prior to the vote at the annual meeting.~~

Section 1. Nominating Committee. (i) **[The Nominating Committee shall consist of the three most immediate past Presidents. If any of the three most immediate past Presidents are unwilling or unable to serve, the remaining members of the Nominating Committee shall select one or more individuals so that the Nominating Committee consists of three individuals.]** (ii) **The Board of Directors shall establish the timeframes under which the Nominating Committee shall operate to nominate a slate of candidates for officers and Directors for the ensuing year for consideration by the voting members at the annual meeting.** (iii) **In nominating a slate of candidates for officers and Directors, the Nominating Committee should take into account the following guiding principles, to the maximum extent reasonably possible:**

- **The President should ordinarily serve for a single one (1) year term.**
- **The candidate for President-Elect should be selected with the assumption that he or she will be nominated for and elected President the following year.**
- **An individual should have served on the Board of Directors for a minimum of two (2) full calendar years (although not necessarily consecutively) before becoming President-Elect.**
- **In general, the Directors advance to the officer positions of President-Elect and the following year, to President, in order of tenure.**
- **An individual's general willingness and ability to serve as a future officer is a relevant, but not a necessary, factor for consideration in selecting nominees for Directors.**

Attachment 2

Strategic Planning 2017–2020

Updated Goals 2017–2020	
Strengthen organizational infrastructure	
1	Manage and pursue revenue generating opportunities to maintain a sound financial base
2***	Pursue hiring executive support
3	Evaluate the effectiveness of the organization of AAFCO for continuous improvement
4	Provide leadership skills enhancement to develop and support AAFCO leaders
5	Optimize resource sharing opportunities
6	Enhance internal communication efficiencies and documentation within the association
Promote and enhance membership participation (internal)	
7**	Identify opportunities to increase member agency participation
8*	Develop and provide professional development and technical training opportunities in support of feed programs
9*	Enhance collaboration, communication and cooperation among regulatory agencies
10	Communicate and document AAFCO benefits and accomplishments
Emphasize feed and food safety	
11	Continue developing member feed safety programs in alignment with FSMA and IFSS
12*	Promote and support laboratory technology, methods, quality systems and collaboration
Vitalize partnerships with external stakeholders	
13	Identify key stakeholders and working partners and common goals
14	Develop and maintain professional relationships with stakeholders and affiliated organizations
Strengthen international presence	
15	Participate in relevant international meetings as resources permit
16	Invite International attendees to association activities
17	Provide a forum for international discussions on feed safety

* Top 3 priority goals

** Priority goal 4 for consideration if adequate progress is made on the top 3

*** Board priority to action

Top 3 Priority Goals [FSMA TF activities integrated]

Updated text: ***bold italic***

Group 1: Mark Leblanc, Nancy Thiex, Ken Bowers, Meagan Davis, Dave Dressler

Outcome	Activity	Resources Needed	Timeline	Responsibility
Strategy: Emphasize feed and food safety				
Goal 1: Promote and support laboratory technology, methods, quality systems and collaboration				
1.1 ** Fund AOAC method development and validation	Review list, remove those that aren't relevant and prioritize the remainders. Identify resources to clear out analytical method needs backlog. Use existing strategy to identify method needs and prioritize them to continuously identify new needs (includes sample preparation)	Funds People	<i>Methods needs survey completed (vitamins top). Have a general priority list that needs to be refined with more specifics: timing – before January 2018.</i> Need to identify resources to address backlog thereafter. 3-5 years to address backlog.	LMSC

Outcome	Activity	Resources Needed	Timeline	Responsibility
Combined with 1.3 (below)	Identify resources to perform additional (field) sample collection studies	Funds Equipment People	6 months to identify resources 1 year to develop adequate protocols 3 years to perform additional sample collection studies	1-ISC 2-LMSC
1.2 *** FSMA TF Item 3: priority setting and method development for contaminants/ hazards	Determine the contaminants, hazards, matrix and action levels to provide guidance to LMSC to inform method development. Integrate collaboratively into current LMSC priorities	Subject matter experts Funds Equipment	Alliance decided not to develop specific hazard guidance information. FDA has assumed the activity; work product expected late year 2017. Complete method needs statement for LMSC. Up to 3 years for subsequent method development and validation (dependent on whether there is existing method). FDA list expected early 2018. Hold: pending hazard specific guidance information from FDA.	FFIMC lead, EIC, ISC, IDC and LMSC
1.3 ** Validation of sampling methods	a) Perform field sampling method validation including sampling equipment and sample type. b) Establish sampling methods needs statement (complete). Identify resources and develop adequate protocols to perform additional (field) sample collection studies.	Funds Equipment People Time	a) No progress field sampling – activities: needs statement, RFP, contract, evaluation. Expect it will take 2 years. b) 6 months to establish sampling method needs statement. 6 months to identify resources 1 year to develop adequate protocols. 5 years to perform sampling method validation. Will flow from 1.1 Also writing laboratory sampling guideline which is expected to be complete by January 2018.	ISC with LMSC support
1.4 ** Collaboration between feed programs and laboratories that perform feed sample analysis and laboratory participation in AAFCO	Encourage participation and attendance by state labs by programs and encourage communication between labs/programs. Reach out to states to encourage laboratory participation (letter/email) in AAFCO.	Time People	Initial letter to state Directors/Commissioners. Mark will draft by September 1, 2017. August 2017 Establishing working group in LMSC for outreach to states and federal laboratories that are not attending to work on increasing participation. (especially AFRPS). January 2018 develop initiatives to increase collaboration.	AAFCO Board (President) LMSC EIC

Group 2: Kristen* Green, Doug Lueders, Richard* Ten Eyck, Abe Brown, Stan Cook, Kelsey* Luebbe, Dave* Edwards, Erin* Bubb

Outcome	Activity	Resources Needed	Timeline	Responsibility
Strategy: Promote and enhance membership participation (internal)				
Goal 2: Enhance collaboration, communication and cooperation among regulatory agencies				
2.1 ** Share compliance letters/enforcement actions. Coordination of enforcement action. Hold: pending identification of additional EIC members to help.	Categorize Listserv topics to Feed BIN	Administrative support Feed Bin	January 2018 All of 2.1: Working to identify member to support this activity and store it in a usable manner electronically (FASS and Richard Ten Eyck).	EIC to designate lead with FASS support - Jennifer
	Share compliance letters and enforcement actions	Guidance from subject matter experts	January 2018	EIC to designate lead with FASS support
	Share Division of Animal Feed letters		January 2018	EIC to designate lead, and coordinate with FDA as necessary; FASS to support
	Enforcement Issues Committee can pick up topics – coordinate and enhance committee action		January 2018	EIC to designate lead with FASS support – Members
	Consider development of core report (similar to that of FDA) (frequency to be determined)	Listserv EIC IDC Any committee	January 2018	EIC to designate lead with FASS support
2.2 *** FSMA TF part of Item 3: Enforcement strategy for contaminants/hazards Hold: pending hazard specific guidance information from FDA.	Determine the contaminants, hazards, matrix, action levels and enforcement strategy to provide guidance to LMSC to inform method development and priority setting.		Alliance decided not to develop specific hazard guidance information. FDA has assumed the activity; work product expected late year 2017. FDA expect to complete in early 2018.	FFIMC lead, EIC, ISC, IDC and LMSC
2.3 ** Enhanced use of Feed BIN	Identify activities to enhance use	Financial support	August 2017 Complete January 2017 (activities detailed in Feed BIN)	CIOC

Outcome	Activity	Resources Needed	Timeline	Responsibility
2.4 ** Coordinate with NASDA to develop a framework for state feed programs to deliver FSMA implementation	Provide data and information for NASDA grant application (AAFCO is sub-contractor) and subject matter experts to support framework development.	AAFCO subject matter experts	5 years Complete: Grant application successful and SME identified. Framework development will be tracked via grant reporting obligations.	NASDA-AAFCO-FDA FSMA Steering Committee (AAFCO reps: Linda, Ali, Bob W., Richard)
2.5 *** FSMA TF Item 1-align Model Bill with needed authorities to Implement FSMA	Make recommendations to align the Model Bill with needed authorities to implement FSMA		Language finalized August 2017. Complete: January 2017 membership vote	MBRC
2.6 *** FSMA TF Item 2 - transition AAFCO GMPs to FSMA GMPs and convert AAFCO Model Feed Safety Program Plan to AFRPS	a. Develop a plan for states that have adopted AAFCO's model GMPs to transition to FSMA GMPs. b. Remove Model Feed Safety Plan from OP (archive for historical reference) and use AFRPS instead		Complete: August 2016	a. FFIMC with MBRC and PFC b. FFIMC with OP section editor and Feed Safety Coordinator
2.7 *** FSMA TF Item 6 – develop communication plan for AAFCO specific FSMA implementation activities	a. Develop an AAFCO Communication Plan to better inform b. Develop a model communication plan for states to use for outreach to regulated parties		Framework development (activities detailed in Feed BIN); content development will be ongoing thereafter Draft developed February 2017. Working with Richard TE and FDA to finalize. Expect 6 months to finalize for presentation January 2018 and execute by August 2018.	CIOC 2017 initiated biannual newsletter.

Group 3: Dan Danielson, Ali Kashani, Tim Weigner

Outcome	Activity	Resources Needed	Timeline	Responsibility
Strategy: Promote and enhance membership participation (internal) Goal 3: Develop and provide professional development and technical training opportunities in support of feed programs				
3.1 ** AFRPS – draft curriculum for examples. Available training needs to meet standards	Extract all resource (training) needed to meet Standard 2 Crosswalk to IFPTI; AITS/BITS; ORAU; CVM, FEMA Identify gaps and approach land grant universities	Subject matter experts. Potential travel for non-Co-Ag contract states	Work group formed. Covers 3.1 and 3.2. Draft complete and expect to finish and work with ISC to complete by Nov. 1, 2017	ETC together with ISC
3.2 ** Directory/ listing of trainings available	Once training needs and model training plan are done (above), catalogue courses and categorize as basic and advanced	FASS support	Work group formed. See 3.1	ETC
3.3 ** Model training framework	Develop model document for joint inspection (OJT – on the job training) for feed. Develop model training plan. Not “developing model training plan” per followup conversation with Tim W., Dan D. and Ali K.	Subject matter experts. Potential travel for non-Co-Ag contract states	Work group formed. Need to expand group, including ISC representative (s) and have draft ready by January 2018	ETC and ISC
3.4 *** FSMA TF Item 4 - develop training material not covered through Alliance work product	Verify if training material for feed ingredient manufacturing from the (FSPCA) Alliance meets the needs of inspectors and revise as needed and include in directory of training material	Subject matter experts. Potential travel for non-Co-Ag contract states	Regrouping due to turnover. Will identify members across the committees to work collaboratively to develop a plan by January 2018.	FFIMC & ISC supported by ETC
3.5 *** FSMA TF Item 5 – review and revise the Feed Inspector’s Manual to support FSMA implementation	Review and revise the Feed Inspector’s Manual to make sure it supports FSMA implementation	Subject matter experts. Potential travel for non-Co-Ag contract states. FASS support for publication, including printing/Feed BIN costs.	FDA have completed the initial review for cross committee consideration. Confirm timing adjustment	ISC supported by LMSC and ETC

**** Top 3 outcomes identified at May 2nd planning session**

***** FSMA TF outcomes integrated into 2017-2020 Strategic Plan**

Participants:

Name	Priority voting pre-meeting	Attended May 2	AAFCO role
Mark LeBlanc	✓	✓	Board
Ken Bowers	✓	✓	Board/Chair Subc.
Richard Ten Eyck		✓	Board/Chair
Ali Kashani	✓	✓	Board/Chair
Dan Danielson	✓	✓	Board/Co-Chair

Name	Priority voting pre-meeting	Attended May 2	AAFCO role
Stan Cook	✓	✓	Board/Chair
Erin Bubb	✓	✓	Board
Robert Geiger			Board
Kristen Green	✓	✓	Board
Eric Nelson			FDA advisor
Dave Edwards		✓	FDA advisor
Abe Brown		✓	FDA advisor
Tim Weigner		✓	FDA advisor
Tim Lyons			Chair
Meagan Davis	✓	✓	Chair
Dave Dressler		✓	Co-Chair
Chad Linton			Co-Chair
Nancy Thiex	✓	✓	Co-Chair
Aaron Price	✓		Co-Chair
Doug Lueders	✓	✓	Chair
Linda Morrison	✓	✓	Chair
Bob Waltz	✓		Feed Safety Coord
Kelsey Luebbe		✓	Co-Chair