Association of American Feed Control Officials

2019 AAFCO Midyear Meeting
Committee Reports

January 19–23, 2019

Hyatt Regency

Savannah, Georgia

Association of American Feed Control Officials

Contents

Association Business Meeting Minutes

2018 AAFCO Annual Meeting
Monday, July 30, 2018, 9:05–9:36 am, Fort Lauderdale, Florida

Agenda

1) Stan Cook convened business session of the Association at 9:05am
   a) Presented Distinguished Service Award to Bob and Amy Kieffer In recognition of their leadership and hard work in helping the AAFCO Proficiency Testing Programs receive ISO 17043:2010 Accreditation.
   b) Presented a Distinguished Service Award to Andy Crawford In recognition of his leadership as Statistician for the AAFCO Proficiency Testing Program and role in facilitating the program to achieve accreditation to ISO 17043.
   c) Presented a Distinguished Service Award to Louise Ogden In recognition of her leadership as AAFCO Proficiency Testing Program Co-Chair and Quality Manager and role in facilitating the program to achieve accreditation to ISO 17043.
   d) Presented a Distinguished Service Award to Brenda Snodgrass In recognition of her leadership as AAFCO Proficiency Testing Program Committee Chair and Program Manager and role in facilitating the program to achieve accreditation to ISO 17043.
   e) Presented a Distinguished Service Award to Aaron Price In recognition of his contributions on Laboratory Methods & Services Committee, contributions to the 2007 and 2014 Quality Assurance/Quality Control Guidelines, contributions to GOOD Test Portions, and years of dedication to AAFCO and its members.
   f) Presented a Distinguished Service Award to Nancy Thiex In recognition of her contributions on Laboratory Methods & Services Committee, leadership of the Proficiency Testing Program and achievement of ISO 17043 accreditation, hard work and years of dedication to AAFCO and its members.
   g) Presented a Distinguished Service Award to Richard Sellers In recognition of his leadership, hard work and years of dedication to AAFCO as both a member of AAFCO and as an Advisor to the AAFCO Committees.
   h) Presented a Distinguished Service Award to Meagan Davis In recognition of her selfless service in multiple capacities, leadership, hard work and years of dedication to AAFCO and its members.
   i) Presented a Certificate of Appreciation to Jim Barritt In recognition of his hard work in assisting the Pet Food Label Modernization Workgroups with design of Pet Food Label Graphics.
   j) Presented a Certificate of Appreciation to Jim York In recognition of his hard work in assisting the Pet Food Label Modernization Workgroups with design of Pet Food Label Graphics.
   k) Presented a Certificate of Appreciation to Jacob Fleig In recognition of his hard work and significant leadership of AAFCO and its members in organizing and managing the 2018 Advance Inspector Training Seminar.
   l) Presented a Certificate of Appreciation to Amanda Anderson In recognition of his hard work and significant leadership of AAFCO and its members in organizing and managing the 2018 Advance Inspector Training Seminar.
   m) Presented a Certificate of Appreciation to Erin Bubb In recognition of her hard work and significant leadership of AAFCO and its members in organizing and managing the 2017 Advance Inspector Training Seminar.
   n) Presented a Certificate of Appreciation to Dave Dressler In recognition of her hard work and significant leadership of AAFCO and its members in organizing and managing the 2017 Advance Inspector Training Seminar.
   o) Presented a Certificate of Appreciation to Dave Phillips In recognition of his hard work in organizing and managing the 2016 & 2017 Feed Administrators Seminar
2) Bob Geiger 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 Committee, Inspection and Sampling, Lab Methods & Services, Model Bills and Regulations, Pet Food, Proficiency Testing, and Strategic Affairs and recommends the same to the membership. I so move. **George Ferguson Seconds. MOTION CARRIES**
3) **Acceptance of Committee Recommendations:**

Ingredient Definitions 1-3:

1) Publish the following tentative definitions as Official and remove the existing Official definition if any:
    a) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish the following tentative definition **T40.100 Recovered Retail Food** as Official and remove the existing Official definition if any in the AAFCO Official Publication and recommends the same to the membership. I so move. **Dave Dressler Seconds. MOTION CARRIES**
        i) T40.100 Recovered Retail Food Is composed of edible human food products safe and suitable for livestock feed that are collected from retail food establishments, domestic holding facilities, and domestic packing facilities. Permitted recovered retail foods are products from overstocks, lacking consumer acceptance, or beyond their sell-by date that include items such as bruised, cut, or overly ripe produce (fruit and vegetables), bakery goods, eggs, and dairy products. It shall be safe and appropriately labeled for its intended use and shall be free of material harmful to animals. Materials excluded from this definition include pet foods, products containing beef, lamb, pork, poultry, fish, or shellfish. It must not contain packaging materials (e.g., plastics, glass, metal, string, Styrofoam, cardboard, and similar materials), flowers, potted plants, or potting soil. The recovered foods shall be collected and intermixed in secure holding containers to exclude unauthorized addition of trash, materials harmful to animals, or infestation and adulteration by pests. Egg and dairy products (and other products ordinarily held at refrigerator temperatures) must be kept in cold storage until the scheduled pick-up. To minimize spoilage, the recovered retail food shall be collected at least weekly, or more frequently if necessary. The establishment should have a sanitation plan in place, and the containers should be cleaned and sanitized as necessary. The collected material may be further processed or delivered as is to an animal feeding facility. The product must be handled to preserve its safety and nutritional value. (Proposed 2017, adopted 2019)

2) Establish and publish in the Official Publication a new tentative definition(s) for:
    a) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to establish and publish **T69.8 Oat Fiber** in the AAFCO Official Publication as a new tentative definition and recommends the same to the membership. I so move. **Richard Ten Eyck Seconds. MOTION CARRIES**
        i) T69.8 Oat Fiber Is obtained from oat hulls that have been processed through a continuous wet and dry process to modify soluble and insoluble fractions of the fiber, and to reduce the content of lignin. The ingredient must be guaranteed for neutral detergent fiber, acid detergent fiber, and acid insoluble lignin. Oat fiber is to be used a source of insoluble fiber in animal feed and pet food. (Proposed 2019)
    b) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to establish and publish **T 71.40 Low Glucosinolate High Erucic Acid Rapeseed Meal, Solvent Extracted****in the AAFCO Official Publication as a new tentative definition and recommends the same to the membership. I so move. **Bob Church Seconds. MOTION CARRIES**
        i) T 71.40 Low Glucosinolate High Erucic Acid Rapeseed Meal, Solvent Extracted**Is the meal obtained after the removal of most of the oil by the prepress solvent extraction of whole seeds obtained from the genus Brassica (Brassica napus, Brassica rapa (formerly B. campestris), or Brassica juncea) from which the oil shall contain more than 2% erucic acid and the solid component shall contain less than 30 micromoles of any one or any mixture of 3-butenyl glucosinolate, 4-pentenyl glucosinolate, 2-hydroxy-3-butenyl glucosinolate and 2-hydroxy-4-pentenyl glucosinolate, and allyl glucosinolate per gram of air dry, oil free solid. It must contain a maximum of 2% erucic acid, a maximum of 12% crude fiber and a maximum of 30 micromoles of glucosinolates per gram. It is used in the diets of animals as a source of protein, in accordance with good feeding practice. (Proposed 2019)

c) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to establish and publish **T 73.450 Cashew Nut Shell Liquid** in the AAFCO Official Publication as a new tentative definition and recommends the same to the membership. I so move. **Richard Ten Eyck Seconds. MOTION CARRIES**
   i) T 73.450 Cashew Nut Shell Liquid Is the heat extracted liquid from cashew nut shells to be used as an antioxidant in fats and oils (excluding highly unsaturated oils with iodine value higher than 150) that are suitable for use in animal food. Cashew nut shell liquid can be used at levels up to 6000 mg/kg in fats and oils. The level of cashew nut shell liquid in complete feed must not exceed 600 mg/kg. The liquid ingredient must contain, and be guaranteed for, not less than 10% cardol, not less than 55% cardanol, and not more than 1 % moisture. (Proposed 2019)

d) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to establish and publish **T87.50 Cashew Nut Shell Extract** in the AAFCO Official Publication as a new tentative definition and recommends the same to the membership. I so move. **Richard Ten Eyck Seconds. MOTION CARRIES**
   i) T87.50 Cashew Nut Shell Extract Is the mechanical cold-pressed liquid from cashew nut shells to be used as a flavor additive in cattle feeds in amounts not to exceed 500 ppm in complete feed. The liquid ingredient must contain not less than 59% anacardic acid, not less than 18% cardol, and not more than 3% moisture. Minimum percent anacardic acid must be guaranteed. (Proposed 2019)

3) Publish the following definitions as Official in the Official Publication:

a) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish **73.020 Ammonium Formate** as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Liz Higgins Seconds. MOTION CARRIES**
   i) 73.020 Ammonium Formate The food additive, ammonium formate, may be safely used in the manufacture of complete swine feeds in accordance with the following prescribed conditions:
      (a) The additive is manufactured by the reaction of 99.5 percent ammonia gas and 99 percent formic acid in a continuous loop reactor to produce a solution made up of 37 percent ammonium salt of formic acid and 62 percent formic acid.
      (b) The additive is used or intended for use as a feed acidifying agent, to lower thepH, in complete swine feeds at levels not to exceed 1.2 percent of the complete feed.
      (c) To ensure safe use of the additive, formic acid and formate salts from all added sources cannot exceed 1.2 percent of complete feed when multiple sources of formic acid and its salts are used in combination.
      (d) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act (the act), the label and labeling shall contain:
         (1) The name of the additive.
         (2) Adequate directions for use including a statement that ammonium formate must be uniformly applied and thoroughly mixed into complete swine feeds and that the complete swine feeds so treated shall be labeled as containing ammonium formate.
         (3) Cautions for use including this statement: Caution: Follow label directions. Formic acid and formate salts from all added sources cannot exceed 1.2 percent of complete feed when multiple sources of formic acid and its salts are used in combination.
      (e) To ensure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act and paragraph (d) of this section, the label and labeling shall contain:
         (1) Appropriate warnings and safety precautions concerning ammonium formate (37 percent ammonium salt of formic acid and 62 percent formic acid).

(2) Statements identifying ammonium formate in formic acid (37 percent ammonium salt of formic acid and 62 percent formic acid) as a corrosive and possible severe irritant.
(3) Information about emergency aid in case of accidental exposure as follows:
(i) Statements reflecting requirements of applicable sections of the Superfund Amendments and Reauthorization Act (SARA), and the Occupational Safety and Health Administration's (OSHA) human safety guidance regulations.
(ii) Contact address and telephone number for reporting adverse reactions or to request a copy of the Material Safety Data Sheet (MSDS). 21 CFR 573.170

(Proposed 2011, Adopted 2013, Amended 2017, amended 2019

b) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to publish **73.025 Formic Acid** as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Richard Ten Eyck Seconds. MOTION CARRIES**

i) 73.025 Formic Acid Is manufactured by heating carbon dioxide and NaOH under pressure and decomposing the resulting sodium formate with H2SO4, the resulting formic acid, CH2O2, has a molecular weight of 46.02. The food additive, formic acid, may be safely used in accordance with the following conditions:
(a) The additive is used as a preservative in hay crop silage in an amount not to exceed 2.25 percent of the silage on a dry weight basis or 0.45 percent when direct cut, as follows:
(1) The top foot of silage stored should not contain formic acid and
(2) Silage should not be fed to livestock within 4 weeks of treatment.
(b) The additive is used or intended for use as a feed acidifying agent, to lower the pH, in complete swine and poultry feeds at levels not to exceed 1.2 percent of the complete feed.
(1) The additive consists of not less than 85 percent formic acid (CAS 64-18-6).
(2) The additive meets the following specifications:
(i) Free methyl alcohol not to exceed 1,000 parts per million (ppm);
(ii) Methyl formate not to exceed 1,000 ppm; and
(iii) Moisture not to exceed 15 percent.
(3) To ensure safe use of the additive, formic acid and formate salts from all added sources cannot exceed 1.2 percent of complete feed when multiple sources of formic acid and its salts are used in combination.
(4) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug and Cosmetic Act, the label and labeling shall contain:
(i) The name of the additive.
(ii) Adequate directions for use including a statement that formic acid must be uniformly applied and thoroughly mixed into complete feeds and that the complete feeds so treated shall be labeled as containing formic acid.
(iii) Cautions for use including this statement: Caution: Follow label directions. Formic acid and formate salts from all added sources cannot exceed 1.2 percent of complete feed when multiple sources of formic acid and its salts are used in combination.
(5) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act and paragraph b)(4) of this section, the label and labeling shall contain:
(i) Appropriate warnings and safety precautions concerning formic acid (85 percent formic acid).
(ii) Statements identifying formic acid (85 percent formic acid) as a corrosive and possible severe irritant.

(iii) Information about emergency aid in case of accidental exposure.
(A) Statements reflecting requirements of applicable sections of the Superfund Amendments and Reauthorization Act (SARA), and the Occupational Safety and Health Administration's (OSHA) human safety guidance regulations.
(B) Contact address and telephone number for reporting adverse reactions or to request a copy of the Safety Data Sheet (SDS). 21 CFR 573.480 (Proposed 2011, Adopted 2012, 2013, Amended 2015 rev. 1, 2017, Amended 2019)

5) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the IDC to remove Formic acid from table Table 18.1 from the AAFCO Official Publication and recommends the same to the membership. I so move. **Richard Ten Eyck Seconds. MOTION CARRIES**

Model Bills 1-2:

1) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee recommends Regulation 4(a) be revised as indicated in Attachment A (page 37 of the Committee Report Book) and recommends the same to membership. I so move. **Doug Lueders Seconds. MOTION CARRIES**
2) Bob Geiger states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee recommends the title of Regulation 9 be revised as indicated in Attachment C (page 37 of the Committee Report Book) and recommends the same to membership. I so move. **Doug Lueders Seconds. MOTION CARRIES**

4.) Nomination Committee
Bob Geiger states the AAFCO Board of Directors accepted the recommendation from The Nominating Committee recommending the following slate for Board of Directors to take office January 1, 2019. and recommends the same to membership. I so move. **Liz Higgins Seconds. MOTION CARRIES**

President: Robert Geiger (IN)
President-elect: Kristen Green (KY)
Secretary-Treasurer: Ali Kashani (WA)
Director: Erin Bubb (PA)
Director: George Ferguson (NC)
Director: Austin Therrell, SC
Director: Hollis Glen, CO
Director: Dave Phillips, ND
Immediate past President: Stan Cook (MO)

This concludes committee recommendations needing membership approval.

5) **Credential Report – FASS**
Number of Voting Member States Represented 38
Number of States in attendance 44
Number of Countries 9
Number of FDA Representatives 32
Number of Life Members 4
Total Meeting Attendance 439

George Ferguson MOTION to adjourn meeting at 9:36 am. Bob Geiger Seconds. MOTION CARRIES

August 22, 2018 - Kristen Green MOTION to approve Association Business Meeting Minutes. Bob Church Seconds. MOTION CARRIES

Current Issues and Outreach Committee Report

2018 Annual Meeting
July 30, 9:30–10:30 am, Fort Lauderdale, Florida

Committee Recommendations: None

Board Recommendations: Report accepted October 24, 2018

Association Recommendations: None

Committee Participants

Members Present: Liz Higgins (NM-Vice-Chair), Jennifer Combs (KY), Tim Lyons (MI), Caitlin Price (NC), Richard Ten Eyck (OR), Shaness Thomas (FL), Kent Kitade (Life Member), Ali Kashani (WA-Chair)
Advisors Present: Leah Wilkinson (AFIA), David Dzanis (APPA), David Fairfield (NGFA), David Meeker (NRA), Tomas Belloso (NGFA), Angela Mills (AFIA), Pat Tovey (PFI)

Committee Report

The meeting was called to order at 9:30 am EST by Chair, Ali Kashani.

Announcements

Liz Higgins (NM) will be retiring September 2018 but will still help with the AAFCO News Feed. New committee members: Jennifer Combs (KY) and Caitlin Price (NC). Tamzin Gonzales (NE) has left NE Dept of Ag – Thanks for your work with the committee.

Modifications to Agenda: None

Working Group Reports

AAFCO News Feed – Liz Higgins, NM

Liz Higgins (NM) gave an update on the recent AAFCO News Feed (Volume 3, Issue 1) which was published on June 28, 2018. The group met during this meeting to go over assignments and format of the newsletter.

Discussion

Generally Recognized as Safe Ingredients, Industry perspectives - Leah Wilkinson, AFIA

Leah Wilkinson, Vice President, Public Policy and Education with the American Feed Industry Association (AFIA) gave a presentation on the importance of reliable ingredient review processes for the animal food industry. She highlighted a recent study in which the feed and pet food manufacturing industry contributes over $300 billion to the national, state and local economies while representing just under 1 million jobs. To continue to provide safe, high quality, nutritious animal food products for livestock and pets, the animal food industry needs consistent, reliable and efficient ingredient review processes in order to bring new ingredients and technologies to the market. She indicated the impact on industry for every year of delay of getting an ingredient to market is $1.75 million in lost revenue. Starting in 2010, the ingredient review processes dramatically slowed or actually stopped. Industry shifted to ingredient review processes that brought known clarity for review and timing of review. The shift went to more food additives petitions and generally recognized as safe (GRAS), either notified to FDA or not. During this same timeframe, FDA was finalizing the GRAS final rule which codified that companies are still able to make independent conclusions of GRAS for an intended use and market that product into interstate commerce. Issues have risen with some states not accepting these products as legal feed ingredients. AFIA continues to believe there are mechanisms in place for states that have adopted the model bill and regulations to accept these products. There are several workgroups dealing with these issues that will be reported on this week. AFIA is committed to working together for a solution that works for states and industry.

Online Database of Ingredients (ODI) Progress Update – Steven Stewart, MN & Oca Hoeflein, MocaWorks

The committee thanked Steve Stewart (MN) for his efforts in developing the initial list and the idea to develop ODI and to Oca Hoeflein with MocaWorks for developing the working ODI.

Special thanks to Dave Phillips for his efforts in coordinating and leading the ODI working group as well as his facilitation and lead in many other discussions.

The committee also expresses its thanks to the project members of the Online Database of Ingredients (ODI) working group (Dave Phillips, Charlotte Conway, Liz Higgins, Nathan Price, Laura Earhart, Steven

Stewart) as well as to others in an initial discussion group (Leah Wilkinson, Pat Tovey, David Fairchild, Kristen Green, Dave Phillips). The contribution of many others is also recognized and much appreciated. Many feed labeling creating and review activities involve validation of the ingredient list. These activities can be quite time-consuming and/or labor intensive. The general goal of the project is to confirm proper naming and conditions for use; Ensure all ingredients have acceptable names and be able to identify ingredients with acceptable names; Ensure any special conditions for use are respected; Include appropriate name modifiers; and observe any limitations to specific uses

Some of the technical features of ODI is one-click access to ingredient info as relating to AAFCO Chapter 6 Ingredients with matching of names by either exact matches or partial matches. Batch analysis by entering an ingredient list is one of the features of ODI. There is a Master list of ingredient names. The contents, creation and maintenance of the master list will be the responsibility of AAFCO and not the software developer. This list will be dynamic as there are always new feed ingredient definitions submitted to AAFCO.

The ODI was demonstrated at the meeting. A beta test group will be formed to test the ODI.

The meeting adjourned at 10:30 am.

Education and Training Committee Report

2018 Annual Meeting
August 1, 8:00–10:00 am, Fort Lauderdale, Florida

Committee Recommendations

1) We request the board authorize funding for the digital chalk learning management system for an estimated $8,000 annually, with a potential revenue recovery of 50%, contingent upon a successful submission of an RFP. See Appendix A
2) An electronic vote passed a motion on August 13 to move the "Model Training Manual" for Animal Feed Inspectors, (Version: Final Draft, July 30, 2018), to be accepted as the official AAFCO "Model Training Manual" to be utilized by the Animal Feed Inspection Programs for development of the Training Plan as well as On The Job Training (OJT) and recommends the same to the board.

Board Recommendations: Report accepted October 24, 2018

Association Recommendations: None

Committee Participants

Members Present: Amanda Anderson - KS, Tim Lyons - MI, Jacob Fleig - MO, Kate Ciarletta - CT, Jim True - KY, Rick Manthei - MN, Jo Lynn Otero - NM, Liz Beckman - WA, Darlene Krieger - FDA, David Dressler - FDA, Jeffrey Scallan - LA, Bob Geiger - IN, Marissa Kost - NC, George Ferguson - NC, Richard Ten Eyck - OR, David Edwards – FDA
Members via Phone: Jennifer Godwin – FDA
Advisors Present: David Fairfield, Scott Ringger, Shaun Anderson
Others Present: Chris Weiss - IFPTI

Committee Report

- **Model Training Plan workgroup:** George Ferguson, NC, updated workgroup progress. At the Midyear meeting the committee voted to send the drafted Model Training Plan Manual to the Inspection and Sampling Committee for review and comment with a 60 window. Comments were returned to George and revisions were made as necessary. The committee wanted a final review of the manual before moving the document to the board for acceptance as a final document.
  ACTION: Document was electronically delivered to all committee members for review and electronic vote on August 7
  MOTION "I move that the "Model Training Manual" for Animal Feed Inspectors, (Version: Final Draft, July 30, 2018), be accepted as the official AAFCO "Model Training Manual" to be utilized by Animal Feed Inspection Programs for development of their Training Plan as well as On The Job Training (OJT) and; Upon acceptance by this committee, submit the Model Training Manual to the AAFCO Board with a recommendation that they accept likewise." By George Ferguson, NC. SECOND by Tim Lyons, MI. The committee was allowed a week for review and an electronic vote was called by the chair on August 13 and passed by quorum the same day.
- **Training Calendar workgroup:** The working group has put together a 'one-stop-shop' training calendar in the Feed BIN. Available trainings have been added but the workgroup would like to see more industry trainings made available in the calendar. Jeffrey Scallan will remain the primary contact to add trainings to the calendar.
- **Learning Management System workgroup:** This working group looked into multiple companies to provide a Learning Management System (LMS) for AAFCO. The working group requested cost proposals and demos of the system to meet the needs of states. The workgroup presented information from two companies (Lithmas and Digital Chalk) discussion both the capabilities of the systems and cost. The workgroup recommends Digital Chalk because of both capabilities and cost. Much of the discussion revolved around cost to the states for utilization of the system but those decisions will be made by the Board or Finance Committee. See Appendix A.
  MOTION: "We the workgroup move to have AAFCO (Education & Training Committee) develop an RFP to be published September 15, 2018 to subscribe to a digital Learning Management System that would be utilized to house, assign, and tracking training by employees of AAFCO members. "
  George Ferguson – NC, Jim True – KY seconds. Passes. Chair disbanded the working group.

- **OTED Training Updates:** Deirdra Holloway, FDA Office of Training and Education Development discussed available courses for Animal Food Regulators and necessary prerequisite courses. Chris Weiss from IFPTI gave a brief demonstration of the completed Animal Feed courses that are still under FDA review. They are hoping these courses can be made available by October 1, 2018.
- **BITS & AITS Update:** Miriam Johnson – NC, Inspection and Sampling Committee Chair, updated the committee on upcoming BITS and AITS training as well as the Council on Licensure, Enforcement, and Regulation (CLEAR) trainings provided at the AITS in Kansas City, MO.
- **AAFCO Developed Training:** Discussion surrounding the potential for AAFCO to develop trainings to meet the AFRPS Standards. George Ferguson discussed many states have AFRPS funding available to help develop training modules that could be developed with Land Grant Universities. A training needs survey should be developed to determine subject matter to focus on.
  ACTION: Chair formed a working group to develop and deliver a survey to the members states for specific training needs. Marissa Kost will be workgroup lead. Workgroup members: Kate Ciarletta – CT, Rick Manthei – MN, Jim True – KY, Jo Lynn Otero – NM.

Action Item Table

Responsible	Item	Action	Timing / Status
Amanda Anderson	Model Training Plant	Provide for e-vote	August 10
Amanda Anderson	LMS Proposal	Move to Board for Action	With Minutes
Marissa Kost	Training Needs Survey	Develop with Working Group	Midyear Meeting

Appendix A: Learning Management System Proposal Summary

Workgroup Charge

The workgroup charge is as follows: To identify a software application that can house, assign, deliver, track and report on the training of AAFCO members.

Summary

- A Learning Management System facilitated by AAFCO would be beneficial to members to assign, deliver, and track training.
- Assist States enrolled in AFRPS to implement some program elements of standards (e.g. training, inspection, sampling).
- Assist States not enrolled in AFRPS to enhance and support their current training program.

AAFCO

LMS Workgroup
AAFCO Midyear Meeting 2018
Education & Training Committee

August 1, 2018
8:00 – 10:00 AM

Litmos

digitalCHALK
Delivering the wealth of Knowledge

Litmos

Provides a cloud-based learning management solution (LMS) that unifies virtual, classroom, mobile, social and eCommerce capabilities in a single, secure, and scalable platform that can meet any organization's training needs.

Key Features

- Online Course Builder: supports multiple formats; modules
- Instructor-Led Training: assign virtual or classroom training
- Learning Paths: string together multiple courses in logical order to create personalized learning paths for your learners
- Assessments & Quizzes: reinforce concepts and knowledge retention
- Message & Notifications: real-time notifications of activity
- Reports & Dashboards: review performance and training impact; create custom reports delivered via email
- Surveys & Feedback: gather feedback using surveys and reports

Pricing

DigitalChalk:

*One-Time Setup Fee: $1,099

Active Users	Monthly Fee	Discounted Annual Fee
20	$149	$99/mo x 12 = $1,188
75	$299	$249/mo x 12 = $2,988
150	$449	$399/mo x 12 = $4,788
300	$599	$549/mo x 12 = $6,588
500	$799	$699/mo x 12 = $8,388

Litmos: Pro/Pro + Courses

*Price/User/Month Billed Annually

Active Users	Pro	Pro + Courses
50-150	Minimum 150 users	$15
151-500	$6	$9
501-1,000	$4	$6
1,001-1M	Contact us	Contact us

Examples:
Pro @151 users/mo/year = $10,872
Pro @500 users/mo/year = $36,000
Pro @501 users/mo/year = $24,048

digitalCHALK with LinkedIn

DigitalChalk

Provides a cloud-based learning management system (LMS) enabling businesses to create, import, manage, and deliver online training content, as well as track and report on user training and learning activities.

Key Features

- Customizable Delivery: build your own, use DigitalChalk, or upload external
- Flexible Design: brand courses; custom notifications and bulletins; available on any device
- Content Library: incorporate course from eLearning Library
- Track Progress: online tests, assignments, and more; create learning paths and prerequisites
- Real-Time Analytics: custom reports
- Security & Support: unlimited access to support
- Online Video Tutorials
- LinkedIn Learning Solution's LMS Integration Partner Program: access LinkedIn's entire catalogue of courses

Feed and Feed Ingredient Manufacturing Committee Report

2018 Annual Meeting
July 31, 8:00– 9:30 am, Fort Lauderdale, Florida

Committee Recommendations: None

Board Recommendations: Report accepted October 24, 2018

Association 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: 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: Austin Therrell – SC (Co-Chair); Eric Brady – TN (Co-Chair); Bob Church – MT; Ken Bowers – KS; Bob Geiger – IN; Wayne Nelson - CT; Ali Kashani – WA; Doug Lueders – MN; ; Laura Scott – CFIA; Ben Jones – Texas; Darlene Krieger –FDA/CVM; William Burkholder – FDA/CVM; Dan Danielson – FDA/ORA/OP
Via Telephone: None
Advisors Present: Pat Tovey – PFI; David Meeker – National Renderers Association; Richard Sellers – AFIA; Dan Frank – AFIA; Kim Spinelli – J.M. Smucker; David Dzanis – APPA; David Fairfield – NGFA; James Emerson – US Poultry; Cathy Alinovi – Next Generation PFMA; Ken Gilmurray – JBSUSA; Christine Miller – Sensient Colors, LLC.

Committee Report

Eric Brady called the meeting to order at 8:01 am EST. Members and advisors in the room introduced themselves.

Introductions and Agenda Review, Eric Brady – Austin Therrell
Canadian Food Inspection Agency Update - Laura Scott
Review of Action Items
Mineral Guidelines Working Group – Bill Burkholder

Minute report from meeting. Current Tables in current Official Publication. Apparent from the review information must be more clearly stated in text. Years ago Dr. Benz (retired) reviewed both individual amount and total amounts from other groups. These amounts must be combined due to tables being used for individual elements. The 1978 official publication had the original tables.

The tables must be recreated to be usable. The 1978 OP had a table and it was 5 years until the first guideline – 1983-84 OP. Then two drafts were completed. The guidelines have remained the same from the 1986 OP.

Still working on text – then to management at CVM.

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

Coordination with LMSC.

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
Committee to review charge of Working Group #4.

Other Business

Review Charge of committee-
Members on work group: Bob Church, Ken Bowers, Laura Scott, Cathy Alinovi, Eric Brady, Austin Therrell.
Section Editor:
Darlene Krieger to Assist with Edits for Section – Eric Brady to Section Editor.
Austin/Eric
Motion to adjourn
Bob Church makes motion to adjourn and Eric Brady seconds the motion
09:28 am – Meeting Adjourned

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: January 2019
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 2019
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 2019

Feed Labeling Committee Report

2018 Annual Meeting
July 31, 1:30–2:30 pm, Fort Lauderdale, Florida

Committee Recommendations: None

Board Recommendations: Report accepted October 24, 2018

Association Recommendations: None

Committee Participants

Members Present: David Dressler (PA), Al Harrison (KY), Heather Bartley (WI), Liz Beckman (WA), George Ferguson (NC), Miriam Johnson (NC), Jason Schmidt (LA), Richard Ten Eyck (OR), Mika Alewynse (FDA), and Erin Bubb (PA). Dave Phillips (ND) was present on the phone.
Advisors Present: Dave Dzanis (ACVN/APPA), Jan Campbell (NGFA), Chris Olinger (NGFA), Meghan Dicks (AFIA), Pat Tovey (PFI), and James Emerson (UPA).
Guest Present: Steve Younker (AFIA)
Absent: Steve Gramlich (NE), Angela Mills (AFIA), Ed Rod (APPA), and Charles Starkey (UPA).

Committee Report

Introductions and Agenda Review

David Dressler called the meeting to order at 1:33 PM EDT. Roll call of members and advisors was taken and a quorum was established (10 out of 13).

Non-Medicated Feed Labeling Workshop

David Dressler provided a brief overview of the feed labeling workshop and thanked the speakers for the time they put into provided a successful workshop. Attendees have made several positive remarks about the workshop.

Non-Pet Food Label Design and Format Guide

Minutes from the May 31, 2018 virtual meeting were presented. The purpose of this meeting was to rename the guide to the Animal Feed Labeling Guide. The minutes were never approved, therefore David Dressler called for a motion to accept these minutes.
Richard Ten Eyck motioned to accept the May 31, 2018 meeting minutes. Miriam Johnson seconds.
MOTION CARRIED.

Livestock Treats

Treats for livestock must have all guarantees for the species and class, because there is not a distinction for treats in non-pet food. A discussion was had to determine if we should have a treat category for livestock without moisture.
Dave Dzanis stated there is confusion when companies want to make a chicken treat and whether they need to guarantee all nutrients required by law for a specific animal species and class. It does make sense to just guarantee protein, fat and fiber. Jan Campbell stated that it would be helpful to clarify.
David Dressler stated a workgroup should be formed to create guidelines for a treat category. David will reach out to committee members to see if anyone is interested in leading this workgroup.
Mika Alewynse stated the workgroup should distinguish between a treat and supplement and decide which guarantees to have on the treat.

Livestock Label Review Checklist

Discussion was held to determine if there should be a checklist similar to the Pet Food Label Review Checklist found on page 212 of the 2018 OP for livestock to assist with label development/review.
With the different species and classes, it would be a significant task to take on. There are good references in the Animal Feed Labeling Guide, therefore this checklist would not be needed.

Guarantees for Single Nutrients

A question was brought to the committee about what is the proper way to guarantee single ingredients, such as a protein source for swine.
The model bill has exemptions when certain guarantees are not required (Regulation 3, (4) (XII)) for individual nutrient guarantees, therefore this does not need to be reviewed.

Fiber Guarantees

Discussion about removing the Crude Fiber guarantee (when appropriate) and instead require ADF, NDF and DF.
This topic is covered in model bills, therefore should not be addressed in feed labeling.

Maximum Guarantees for Nutrients with Toxicity Levels

Discussion was held to determine if nutrients from Table 2 on page 298 of the 2018 OP "Official Guidelines Suggested for Contaminates in Individual Mineral Feed Ingredients", when guarantees should state both a minimum and a maximum guarantee. This discussion was introduced during the 2018 Mid-Year meeting, however no action was taken. This topic was added to this meeting to determine how the committee would like to address going forward.
Thoughts from industry it could be a complicated and difficult to require max guarantee for a product that may have ingredients with higher toxicity. Mika Alewynse asked if anyone from the Canadian Food Inspection Agency (CFIA) was in the audience, because they have been doing work in this area and there is information on CFIA's website. Laura Scott from CFIA has agreed to prepare a presentation to give to the committee during the 2019 Mid-Year Meeting in Savannah, GA.
Meagan Dicks reminded the committee that a motion was made during the January 2018 Mid-Year Meeting to have the feed manufacturing workgroup reviewing the NRC to be the workgroup to review maximum guarantees of nutrients with toxicity levels. Dr. Bill Burkholder stated that the workgroup declines taking on this work.
The committee has decided to table any further discussion until after hearing CFIA's presentation.

Meeting adjourned at 2:30 pm

Feed Labeling Committee Special Meeting Minutes

May 31, 2018, 11:30 am–12:00 pm EDT, Conference Call

This meeting was held via conference call.

Committee Participants

Members Present: Chair: Dave Dressler (PA); Vice Chair: Dave Phillips (ND); Mika Alewynse (FDA), Heather Bartley (WI), Liz Beckman (WA), George Ferguson (NC), Al Harrison (KY), Miriam Johnson (NC), Jason Schmidt (LA), and Richard Ten Eyck (OR).
Advisors Present: Meghan Dicks (AFIA)
Absent: Erin Bubb (PA), Tim Darden (NM), Steve Gramlich (NE), David Dzanis (ACVN/APPA), Angela Mills (AFIA), Ed Rod (APPA), Jan Campbell (NGFA), Chris Olinger (NGFA), Pat Tovey (PFI), Charles Starkey (US Poultry Assn) and James Emerson (US Poultry Assn).

Introductions and Agenda Review
David Dressler called the meeting to order at 11:32 AM EDT. Roll call of members and advisors was taken and a quorum was established.
Update to Non-Pet Food Label Design & Format Guide
A workgroup has been updating the guide and in preparation of the guide becoming final, the purpose of this meeting was to discuss a possible name change.
One suggestion was to change the name to the "Animal Feed Labeling Guide". There was concern that this might cause confusion, because of the number of guides. This guide would not solely be animal feed, because pet food has a separate guide, and there is medicated feed, which was once part of the labeling guide, however it's been removed. Due to this confusion, it was further discussed to separate the Animal Feed Labeling guide into two titles, with one title being the Non-Pet Food Label Design & Format Guide and a second title reserved for medicated feed. The Pet Food Labeling Guide will remain as a separate document. It shouldn't pose a problem having pet food as a separate guide, because pet food has been typically separate from other animal feed.
Another suggestion was to change the name to the "Commercial Feed Labeling Guide". It was mentioned that some individuals might not realize that commercial feed would also include unfinished feeds as well as single ingredient feeds.
Since both suggested names have "feed" in the title, it was mentioned that should we use "feed" or "food". While FDA is transitioning from feed to food, they still have the Division of Animal Feeds. The OP already defines Commercial Feed and Animal Feed, therefore, using the term feed would conform to current AAFCO definitions. Furthermore, the updates to the guide are nearly complete and the term "feed" is used throughout. At this time, it would delay the process if the workgroup had to go back and change feed to food. The committee members and advisors agreed that "feed" should be used and not "food".
It was also mentioned that there needs to be a title that would describe what the guide is. There should also be an introduction page to summarize the guide so individuals who are unfamiliar with the guides can fully understand the document they are about to review.
A final point of discussion was should we charge for the guide. Currently, the medicated and non-pet food labeling guides are offered at no cost. It was suggested that the guide would need to be improved upon by adding more substance before a fee should be charged. It was recommended that this discussion should be held at a later date, to which the committee agreed.
A comment was received by an industry advisor to go with "Animal Feed Labeling Guide".
Richard Ten Eyck motions to include a title in the Non-Pet Food Label Design & Format Guide for medicated feed, whenever it is ready. Miriam Johnson seconds. **MOTION CARRIED.**
George Ferguson motions to name the newly created combined guide the "Animal Feed Labeling Guide". Miriam Johnson seconds. **MOTION CARRIED.**
There were no other points of discussion planned for this meeting.
Meeting adjourned at 11:56 am EDT.

Ingredient Definitions Committee Report

2018 Annual Meeting
July 31, 10:00–11:30 am, Fort Lauderdale, Florida

Committee Recommendations

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

1) Publish the following tentative definitions as Official and remove the existing Official definition if any.
   a) T6.12 Taurine
   b) T60.117(B) Dried Black Soldier Fly Larvae
   c) T71.35 *Brassica carinata* Meal, Solvent Extracted**
   d) T73.051 Iron Tartrates.
   e) T73.400 Iron Nickel Tracer
   f) T87.35 Glucose Syrup
   g) T96.*14 Scheffersomyces stipitis* Dried Yeast
2) Establish and publish in the OP a new tentative definition(s) for:
   a) (none)
3) Publish in the OP new Official Definitions for:
   a) New Feed Term "**Common and Usual**"
   b) 33.27 Marine Microalgae
   c) Update Table 36.14 with both the new and the old microorganism names, and the compliance date of January 2022. OK to use either name in the interim.
      i) *Lactobacillus bulgaricus*, renamed to *Lactobacillus delbrueckii***
      ii) *Lactobacillus cellobiosus*, renamed to *Lactobacillus fermentum***
      iii) *Lactobacillus lactis*, renamed to *Lactobacillus delbrueckii***
      iv) *Propionibacterium shermanii*, renamed to *Propionibacterium freudenreichii***
4) Budget recommendations for 19-20 from the Chair: (forward to Ali to be considered with budget)
   a) Maintain a reserve of $20,000 for GRAS and/or AAFCO Definition Process education efforts in support of the GRAS workgroup project.
   b) Budget $1000 for complimentary BIN access (investigators etc). –

Board Recommendations:

Report accepted October 24, 2018
Board accepted committee recommendations 1–3

Association Recommendations: To be considered in January 2019

Meeting Minutes

1) **Roll Call of Committee members present** (quorum was present): Richard Ten Eyck, Erin Bubb, Brett Boswell, Ken Bowers, Bob Church, Stan Cook, Dave Dressler, James Embry, George Ferguson, Jacob Fleig, Steve Gramlich, Brett Groves, Ali Kashani, Dan King, Mark LeBlanc, Dave Phillips, Nathan Price, Laura Scott, Mika Alewynse, Charlotte Conway, Kent Kitade, *new member Bob Geiger (AAFCO President-Elect is a standing member and serves as committee Vice-Chair)*
   Richard Ten Eyck reminded voting members that voting in a timely manner on minutes is very important. Due to late voting, the APRIL IDC webinar minutes were approved after the June 15 deadline for inclusion in the 2018 Annual AAFCO Board meeting. Therefore, a few IDC-approved ingredients definitions were not included for AAFCO Board voting on July 30th. The firms, FDA, and the investigators have done their work, so the IDC requests that States work with the firms and, if possible, accept the affected products.
2) **Investigator recommendations to move tentative to official**
   a) T6.12 Taurine – Richard Ten Eyck
      Brett Groves moves to ACCEPT the recommendation and publish the definition as Official in the OP. Jacob Fleig seconds. MOTION PASSES.
   b) T33.25 Stearic Acid (change 33.19 to 73.116) – Brett Boswell
      Ken Bower moves to ACCEPT the recommendation to keep the definition as Tentative. Brett Groves seconds. MOTION PASSES.
   c) T33.26 Palmitic Acid (change 33.19 to 73.116)- Brett Boswell

Ken Bowers moves to ACCEPT the recommendation and to keep the definition as Tentative. Brett Groves seconds. MOTION PASSES.

d) T60.117(B) Dried Black Soldier Fly Larvae – Erin Bubb
Stan Cook moves to ACCEPT the recommendation and publish the definition as Official in the OP and to delete the current, published definition 60.117 (in the online OP). Mark LeBlanc seconds. MOTION PASSES.

e) T71.35 *Brassica carinata* Meal, Solvent Extracted** - Bob Church
Bob Church moves to ACCEPT the recommendation and publish the definition as Official in the OP. George Ferguson seconds. MOTION PASSES.

f) T73.051 Iron Tartrates – Richard Ten Eyck
Nathan Price moves to ACCEPT the recommendation and publish the definition as Official in the OP. Mika Alewynse seconds. MOTION PASSES.

g) T73.311 Hydrogenated Glycerides –Richard Ten Eyck (triggers deletion of old 33.19)
Jacob Fleig moves to ACCEPT the recommendation to keep the definition as Tentative. Mark LeBlanc seconds. MOTION PASSES.
Richard Ten Eyck recommended to keep this definition as Tentative. If made Official, it would delete the current official definition and FDA is still reviewing data. Charlotte Conway confirmed that FDA is still reviewing the additional data to support other intended uses (not covered by the current definition). She stated that FDA will finish their review in time for the October IDC webinar meeting.

h) T73.400 Iron Nickel Tracer – Richard Ten Eyck
Ken Bowers moves to ACCEPT the recommendation and publish the definition as Official in the OP. Brett Groves seconds. MOTION PASSES.

i) T87.35 Glucose Syrup –Richard Ten Eyck
Mika Alewynse moves to ACCEPT the recommendation and publish the definition as Official in the OP. Erin Bubb seconds. MOTION PASSES.

j) T96.14 *Scheffersomyces stipitis* Dried Yeast - Richard Ten Eyck
Dan King moves to ACCEPT the recommendation and publish the definition as Official in the OP. Ken Bowers seconds. MOTION PASSES.

3) **Work Group Reports**

a) GRAS verification workgroup report – Sue Hays
Sue Hays gave the GRAS Verification workgroup report. The work group has been meeting, is still aligning, and making progress in establishing the project goals. However, nothing has been finalized. Charlotte Conway expressed FDA's position that GRAS substances not reviewed by CVM should not be published in the AAFCO OP or AAFCO would risk violating the MOU. Sue Hays relayed that Dave Edwards is part of the workgroup and the group is aware of FDA's concerns.

b) DFM Nomenclature Changes workgroup – Maggie Faba
Maggie Faba provided the DFM Nomenclature Changes workgroup with input from Kristi Smedley and Mika Alewynse. Currently there are 11 additional microorganisms that have been identified as needing their nomenclature updated. The workgroup is currently working to gather supporting information. There was a request for workgroup members to respond whether or not they would like to continue participating in this workgroup.

c) Negative List Workgroup - Kent Kitade
A formal report will be given at the October IDC webinar meeting.

d) Confusing Pet Food Names Workgroup – Brett Boswell
Not discussed at this meeting. Update to be provided at the October IDC webinar meeting.

e) Guidelines For requesting Definitions Editing Workgroup – Kristi Smedley
Not discussed at this meeting. Update to be provided at the October IDC webinar meeting.

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

a) New Feed Term "**Livestock**" – Ali Kashani
No motion was made to accept the workgroup report. The workgroup to define the new feed term "Livestock" was disbanded due to a lack of committee interest.

b) New Feed Term "**Common and Usual**" – Ali Kashani
Mika Alewynse moves to ACCEPT this new feed term; Stan Cook seconds. MOTION PASSES. Committee vote was 9-9 with chair breaking the tie.

During discussion, it was noted that the revised definition for "common and usual" was just posted to the FEED BIN. There was confusion as who was to upload it. Charlotte Conway (FDA) stated that the changes made were a result of the discussion at the April IDC web meeting and that FDA did participate in drafting of this proposed feed term.
Leah Wilkinson (AFIA) stated that AFIA has some concerns with the sentence that says, "An ingredient which has had a constituent removed, such that the ingredient is no longer identical or similar to the original product …" It is not clear as to what "similar" means. Charlotte Conway (FDA) stated that this language was added to help with ingredients such as corn, and to be consistent with the 21 CFR 502.5(a) language. When corn is grown, each batch of corn can be slightly different from each other, but they are all still corn.

c) ~~Plant Protein Collective Term (Placeholder)~~

d) 33.27 Marine Microalgae – Brett Boswell
Brett Groves moves to ACCEPT the recommendation to adopt this new Food Additive, 21 CFR 573.615, and publish the definition as Official in the OP. Ken Bowers seconds. MOTION PASSES.

e) DFM name changes. Multiple organisms – Mika Alewynse
Mika Alewynse moves to update Table 36.14 with both the new and the old microorganism names, and the compliance date. Mark LeBlanc seconds. MOTION PASSES.
   i) *Lactobacillus bulgaricus*, renamed to *Lactobacillus delbrueckii***
   ii) *Lactobacillus cellobiosus*, renamed to *Lactobacillus fermentum***
   iii) *Lactobacillus lactis*, renamed to *Lactobacillus delbrueckii***
   iv) *Propionibacterium shermanii*, renamed to *Propionibacterium freudenreichii***
   ** date of compliance January 2022

Mika Alewynse (FDA) stated that the workgroup met yesterday to further discuss this topic. They wanted to avoid confusion with the deletion of the old names. She also said that there was always the intention to give a grace period for change. The two columns will be made into one and as each genus species, you will have the original name with "renamed to…" and "**" will be added to indicate the compliance date for change, which will be 2 years from the publication in the OP (hard copy). The DFM work group has now addressed the four microorganisms identified above. Laura Scott (CFIA) asked if both names would be acceptable. Mika Alewynse (FDA) replied that either name would be fine until the compliance date, after which time the new name should be used.

f) Vitamin names (placeholder) – Tom Phillips
Not discussed at this meeting, but will be discussed at the next IDC meeting.

5) **Discussions:**

a) Lab Grown Proteins 11:00AM – Brett B.
   i) Eric Mittenthal, Vice President of Public Affairs for the North American Meat Institute (NAMI) (via webinar)
   Richard Ten Eyck stated that there would be no action on this discussion and it is only for educational purposes.
   ii) TBD

b) **Hemp** Update – Bob C. & Brett B., Scott Z.
Not discussed at this meeting.

c) GRAS policy discussion – Doug Lueders
Not discussed at this meeting.

d) Use of the tentative process – Share survey results (Richard)
Not discussed at this meeting. The survey is posted in the BIN Library/ Ingredient Definitions/ Investigators Recommendations.

e) Bison & Buffalo nomenclature (may be covered under confusing name discussion) – Brett Boswell
Brett Boswell stated that over the last six months there has been controversy and confusion over the use of the terms bison and buffalo in pet food. Brett Boswell suggested a workgroup be formed, perhaps as a sub-committee of the confusing food names workgroup. He offered to lead the workgroup. Richard Ten Eyck suggested this be a separate workgroup. Bob Church will join the workgroup along with someone from FDA.
Bob Church introduced Dave Carter, Executive Director, National Bison Association, to the IDC. Dave Carter provided more insight on the issue. Buffalo refers to water buffalo. However,

in the US, it is a term that people use to describe bison. The National Bison Association asks that the term, water buffalo, be used when the meat is from water buffalo, and that the term, bison, used for American bison. This would help resolve confusion.

f) Adding odor control in rabbits to intended use of 87.29 *Yucca schidigera* extract – Discussion – Richard Ten Eyck - *this intended use needs additional data submitted to support a modification*
Not discussed at this meeting.

g) Modification of 60.110 Ground Pecan Shells to add an intended use as anti -oxidants source – Erin Bubb - *this intended use needs additional data submitted to support a modification*
Not discussed at this meeting.

h) Bentonite Definition Edits – Richard Ten Eyck
Not discussed at this meeting. Contact Richard if interested.

i) Status on high profile ingredients (if needed) – Richard Ten Eyck/ CVM
Not discussed at this meeting.

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

k) Any activities needing 19 - 20 Association funding? Not discussed at this meeting.

l) Set Webinar **meeting dates** for:
   i) October 5, 2018 12:30PM Eastern,
   ii) April XX 2019

Meeting Adjourned at 11:34 pm

Minutes accepted 8/24/2018 with 12 affirmative votes.

The following committee members did not vote: Bob Geiger, Stan Cook, James Embry, George Ferguson, Steve Gramlich, Brett Groves, Ali Kashani and Mark LeBlanc.

Appendix A: IDC 7/30/2018 Meeting

New feed term:

Common or usual name. The common or usual name of a feed ingredient shall accurately identify or describe, in as simple and direct terms as possible, the basic nature of the ingredient or its characterizing properties. The name shall be uniform among all identical or similar ingredients and may not be confusingly similar to the name of any other ingredient that is not reasonably encompassed within the same name. Each ingredient shall be given its own common or usual name that states, in clear terms, what it is in a way that distinguishes it from other ingredients. An ingredient which has had a constituent removed, such that the ingredient is no longer identical or similar to the original ingredient, shall be identified with a different name. Common or usual names of many ingredients used in animal feed are found in the Association of American Feed Control Officials' Official Publication, Chapter 6 – Official Feed Terms and Ingredient Definitions.

New Official Common Name and Definition:

33.27 Marine Microalgae

The food additive, marine microalgae, may be safely used as a source of docosahexaenoic acid (DHA) and other omega-3 fatty acids in accordance with the following prescribed conditions:

(a) The additive is dried whole cells of nonviable, nontoxigenic, nonpathogenic *Schizochytrium* sp. algae grown as a pure culture.

(b) The additive is used in complete, dry adult maintenance food for dogs in accordance with good manufacturing and feeding practices not to exceed 16.5 pounds per ton (7.5 kilograms (kg) per 1000 kg) of complete, dry, adult maintenance dog food.

(c) The additive consists of not less than 17.0 percent (4*Z*,7*Z*,10*Z*,13*Z*,16*Z*,19*Z*)-docosa-4,7,10,13,16,19-hexaenoic acid (docosahexaenoic acid or DHA).

(d) The additive meets the following specifications:
  (1) Not less than 40 percent crude fat;
  (2) Not more than 12 percent ash;
  (3) Not more than 8 percent unsaponifiable matter;
  (4) Not more than 5 percent insoluble impurities;
  (5) Not more than 5 percent free fatty acids; and
  (6) Not more than 6 percent water.

(e) To ensure the safe use of the additive, in addition to 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, marine microalgae.
  (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 the additive shall not exceed 16.5 pounds per ton (7.5 kg per 1000 kg) of complete, dry, adult maintenance dog food.
    (ii) Adequate directions for use.

21 CFR 573.615

Ingredient Definitions Committee 4/19/2018 Webinar

Committee Recommendations

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

1) Move the Enzyme Marketing Coordination document from chapter 5 to chapter 6 and place after Table 30.1
2) Add 2 Carbohydrases to Table 30.1

Beta-Glucanase	*Talaromyces versatilis* overexpressing glucanase
Xylanase	*Talaromyces versatilis* overexpressing xylanase

3) Publish an Official definition for 73.046 **Silicon Dioxide** to reflect the FDA food additive regulation 21 CFR 573.940.
4) Add AAFCO Definitions 84.62, 84.16, 84.63, 84.64, & 84.71 to the collective term Plant Protein in the OP.
5) Add L-Glutamine the subject of AGRN 19 to GRAS Notification table in section 101.
6) Add phytase the subject of AGRN 21 to GRAS Notification table in section 101.

Board Recommendations

Report accepted August 1, 2018
Board accepted committee recommendations 1–6

Association Recommendations

To be considered in July 2018
Editorial changes NOT needing Association consideration:

1) Update header of section 30.

Webinar Minutes

Technical note: The software used for the webinar unexpectedly restricted attendance to 100 people. A committee quorum was present. The committee and the AAFCO executive board agreed to proceed with the meeting. The meeting was recorded and the recording is posted in the BIN / Ingredient Definitions library. Topics for discussion were postponed to a later webinar to allow for additional people to join.

1) **Roll Call of Committee members present** (quorum was 21 out of 25 committee members)
   Richard Ten Eyck, Mika Alewynse, Erin Bubb, Brett Boswell, Ken Bowers, Bob Church, Charlotte Conway, Stan Cook, David Dressler, James Embry, George Ferguson, Jacob Fleig, Steve Gramlich, Ali Kashani, Dan King, Kent Kitade, Jennifer Kormos, Mark Le Blanc, Dave Phillips, Nathan Price, Laura Scott
2) **Investigator recommendations to move tentative to official:** None
3) **New Definitions, deletions & edits**
   a) New Feed Term "**Livestock**"–(placeholder take up in August 2018) Ali
   b) New Feed Term "**Common and Usual**" – Ali Jacob/Steve move to accept. Motion was withdrawn after discussion.
      Work Group will continue to work on the term and revisit at the August meeting.
      Dave Dzanis stated that everything seems to be taken out of 502.5 except for the part about "if constituent is removed…". Dave Dzanis wondered how this lines up with what AAFCO has done previously. Charlotte Conway replied that the work group was trying to address, for example, moisture can be removed without needing a new definition like dried corn, but if juice is removed from fruit then fruit pomace would need a new definition. Dave Dzanis said that it appears to be an option if a new definition is needed or not. Charlotte Conway thought that Dave Dzanis had is a fair point and thought that the "if constituent is removed…" portion could be problematic on multiple fronts Charlette Conway suggested that the work group should work on term further. Ali Kashani agreed.
      Participants also voice opinion through the chat box. "kakarry" echoed Dave Dzanis' point regarding fruit pomace. "Tpettec" raised the concern that the term has only been posted on the Feed BIN for two weeks.
   c) Section 30 header edits (**enzymes**) (placeholder) doesn't go to the board
      Ken Bowers moves to ACCEPT the editorial change to the Section 30 header. Jacob Fleig seconds. MOTION PASSES.

This is an editorial change to the Section 30 header. The proposed changes are to aid in enzyme ingredient naming and refers to the Enzyme Marketing Coordination document following Table 30.1. Emily Helmes stated that the Enzyme Technical Association (ETA) supports this change, since it will clarify how enzymes are named. Mika Alewynse requested that before this is published in the OP that the italics are removed from the source organism (aspergillus niger) in the ingredient name.

d) Move Enzyme Marketing Coordination Document to chapter 6 (board rejected and asked Why it can't stay where it is?) Tamzin (see response document)
Erin Bubb moves to ACCEPT moving the Enzyme Marketing Coordination document after Table 30.1. Mika Alewynse seconds. MOTION PASSES.
Tamzin Gonzales stated that the intent for move is to consolidate information for Regulators and for Industry. She also stated that this would be a similar structure to the Guide for New Ingredient Definitions. This move was proposed one year ago. The Board asked why couldn't it stay where it is. Tazmin Gonzales said that the move would consolidate all the information available on enzymes instead of it being piecemealed. Emily Helmes stated that ETA supports this move and agrees it will be less confusing for both Regulators and Industry. Erin Bubb feels that she has enough information to communicate with the Board.

~~e) T57.xx Manganese Hydroxychloride (placeholder) Jennifer~~

f) 73.046 21 CFR update on 573.940 **Silicon Dioxide** -CVM
Jacob moves to ACCEPT. Ken Bowers seconds. MOTION PASSES.
Dave Edwards CFR listing has been updated to include a new use. Kristi Smedley supports this change. Dave Edward Piperazine is a catch up.

g) 84.62, 84.16, 84.63, 84.64, & 84.71 add to Plant Proteins Collective Term -- Jacob Fleig
Jacob Fleig moves to ACCEPT the addition of 84.62, 84.16, 84.63, 84.64, & 84.71 to the collective term Plant Protein. Bob Church seconds. MOTION PASSES.
Lorraine Gershman from NOPA supports this motion

~~h) 84.51 Soy Flour (fiber change) (placeholder) Bob Church~~
Tabled

i) AGRN 19 Add to section 101 – Nathan
Nathan Price moves to ACCEPT the addition of AGRN 19 to Table 101.1. Ali Kashani seconds. MOTION PASSES.
Dave Edwards stated that the FDA website was updated in regards to AGRN 19. The "Substance" was changed to L-Glutamine. Dave Edwards will to send the updated document to Richard Ten Eyck.

j) AGRN 21 Add to section 101 – Nathan
Nathan Price moves to ACCEPT the addition of AGRN 21 (phytase) to Table 101.1. Steve Gramlich seconds. MOTION PASSES.

k) Table 30.1 add to Carbohydrases (Mika/Tazmin)

Beta-Glucanase	*Talaromyces versatilis* overexpressing glucanase
Xylanase	*Talaromyces versatilis* overexpressing xylanase

Nathan Price moves to ACCEPT the new xylanase definition. Mika Alewynse seconds. MOTION PASSES.
Nathan Price moves to ACCEPT the new beta-glucanase definition. Mika Alewynse seconds. MOTION PASSES.
Please note that the spelling of glucanase needs to be correct in the second line of the investigator report.

4) **Work Group Reports**

a) GRAS verification workgroup report – Emily Helmes (Tabled)
Will give update in June

b) DFM Nomenclature Changes workgroup – Tazmin?/Mika (Tabled)
Meeting is scheduled for May 3rd.

c) Negative List Workgroup – Kent Kitade (lead) (Tabled)
Have not met yet and has nothing to report yet
WG members: Kent Kitade (Lead), Cathy Alinovi, Dave Phillips, Leah Wilkinson, Kristi Smedley, Erin Bubb, Betty McPhee, Molly Morrissett, Kristen Green

d) Confusing Pet Ingredient Food Names Workgroup – Brett Boswell (lead) (Tabled)
Have not met yet.

e) Guidelines For Requesting Definitions – Kristi Smedley (Tabled)

5) **Discussions:**

a) Use of "Buffalo" on Labels – Brett Boswell (Tabled until June 7 webinar)
b) Does the **Tentative** process need to be applied to every ingredient? (Tabled)
c) **Hemp** Update – Bob C. & Brett B., Scott Z. (Tabled)
d) Status on high profile ingredients (if needed) – Richard / CVM (Tabled)
e) Discussion of common human foods in pet food (placeholder) (Tabled)
f) Any activities needing 18-19 Association funding? (Tabled)
g) Set Webinar **meeting dates** for 2018
Richard Ten Eyck proposed another webinar at the end of June 7, 2018 11:30AM Pacific Time to discuss the Work Group Reports and the Discussion items. This will be an informal meeting. Link
https://zoom.us/j/823407767; 1 646 876 9923; Meeting ID# 823 407 767
h) Next IDC meeting in Ft. Lauderdale 7/31 2018

Meeting Adjourned.
Minutes approved 6/27/2018 with 14 Affirmative votes.

Text for recommendations on April 19, 2018, IDC meeting.

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)
19 (PDF - 123 pages)	Freedom Health L.L.C.	L-Glutamine	L-Glutamine	Utility information not evaluated for GRAS, see FDA's letter for more information.	Post-weaning horses.	3/22/2016	FDA has no questions. (PDF - 3 pages)

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)
21 (PDF – 598 pages)	Agrivida, Inc.	Ground grain obtained from a corn (Zea mays) variety that expresses an altered appA 6-phytase gene obtained from Escherichia coli strain K12	Phytase	To increase the digestibility of phytin-bound phosphorous or to increase phosphorous availability from phytate in poultry feeds when used at a rate of 75 g to 1.7 kg per ton of complete feed and providing 250-6000 phytase units (FTU)/kg complete feed.	Poultry	7/28/2016	FDA has no questions. (PDF – 4 pages)

Add as Official:

73.046 Silicon Dioxide

The food additive silicon dioxide may be safely used in animal feed in accordance with the following conditions:

(a) The food additive is manufactured by vapor phase hydrolysis or by other means whereby the particle size is such as to accomplish the intended effect.

(b) It is used or intended for use in feed components as an anticaking agent, and/or grinding aid, as follows:

Feed component	Limitations (percent)
BHT (butylated hydroxytoluene)	2
Methionine hydroxy analog and its calcium salts	1
Piperazine, piperazine salts	**0.8**
Sodium propionate	1
Urea	1
Vitamins[a]	3

[a]Silicon dioxide may be mixed with Vitamin E at levels up to 50%, to produce Vitamin E Supplement for addition to animal feed. Where silicon dioxide is used as a dispersant and/or flow agent to assist with uniform and consistent distribution of the vitamin E supplements in animal feed, silicon dioxide should be declared on the ingredient list of the vitamin E supplement.

(c) It is used in feed as an anticaking agent in an amount not to exceed that reasonably required to accomplish its intended effect and in no case in an amount to exceed 2 percent by weight of the finished feed.

(d) It is used or intended for use in feed components, as a carrier as follows:

Feed component	Limitations (percent)
Flavors	50

(e) To assure safe use of the additive, silicon dioxide is to be used in an amount not to exceed that reasonably required to accomplish its intended effect, and silicon dioxide from all sources cannot exceed 2 percent by weight of the complete feed.

21 CFR 573.940 (Proposed 1964, Adopted 1965, Amended 2008, Adopted 2010, **xxx 2018**)

Ingredient Definitions Committee 10/5/2018 Meeting

Committee Recommendations

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

1) Delete Definition 33.19 **Hydrogenated Glycerides** as an energy source. See page 383 of the 2018 online OP revision 1.
2) Publish in the OP new Tentative Definitions for:
   a) T57.167 **Manganese Hydroxychloride**
   b) T73.311(A) **Hydrogenated Glycerides**
   c) T73.401 **Colored Graphite Tracer**
3) Publish in the OP new Official Definitions for:
   a) 90.9 **25-hydroxyvitamin D_3**
4) Edit tables with results to be reflected as Official
   a) Table 101.1 AGRN 24 **L-Methionine 90%**

Board Recommendations

Report accepted October 24, 2018
Board accepted committee recommendations 1–4

Association Recommendations

To be considered in January 2019

Edits to the OP. No need for further Association action.

1) An editorial change to update 36.14 with the new and old organism names and the compliance dates.
2) T60.117 (B) Black Soldier Fly Larvae -edit to add poultry- Edit to occur before board reviews IDC annual meeting recommendations.

Communication to the Board

The committee feels a feed term for "health" is not needed. The model bill should be edited to clarify that health pertains to humans and animals.

Meeting Minutes

The meeting was convened at 9:30 am PST via webinar by Chairperson Richard Ten Eyck.

1) Roll Call of Committee members
   Richard Ten Eyck, Erin Bubb, Bob Geiger, David Beard, Brett Boswell, Ken Bowers, Bob Church, Stan cook, Dave Dressler, Maggie Faba, George Ferguson, Steve Gramlich, Ali Kashani, Dan King, Rick Manthei, Dave Phillips, Nathan Price, Laura Scott, Mika Alewynse, Charlotte Conway, Kent Kitade, Jennifer Kormos, Tom Phillips
   A quorum was present 20/25.
2) Investigator recommendations to move tentative to official
   a) T73.311 Hydrogenated Glycerides – Yes, Richard (triggers deletion of old 33.19)
      Tabled to October 19, 2018 webinar.
3) Work Group Reports
   a) GRAS verification workgroup report – Sue Hays
      Tabled to October 19, 2018 webinar.
   b) Non-Defined List Workgroup - Kent Kitade
      Tabled to October 19, 2018 webinar.
   c) Confusing Pet Food Names Workgroup – Brett Boswell
      Tabled to October 19, 2018 webinar.
   d) Guidelines For requesting Definitions Editing Workgroup – Kristi Smedley
      Tabled to October 19, 2018 webinar.
   e) ODI Subcommittee? (new) – tbd
      Tabled to October 19, 2018 webinar.
4) New Definitions, deletes & edits:
   a) New Feed Term "**Livestock**" – Ali (need recommendation)
      Ali Kashani stated that there was no support for the definition at the last meeting. Richard Ten Eyck noted that the Board asked that definition be created for treat, livestock, and

health. Ali Kashani would like to reform the Work Group and requested that previous members let him know if they would like to join and invited others to join as well. Ali Kashani said that he is not planning on developing a new feed term for health, since this should be covered by the Model Bill. Charlotte Conway from FDA agrees that it will be difficult to develop a definition for health and that treat can be defined without defining livestock. The Committee will take this information back to the Board.

~~b) New Feed Term Water Buffalo (placeholder)~~

~~c) New Feed Term American Buffalo (placeholder)~~

~~d) New Feed Term Bison (placeholder)~~

~~e) 15.xx Brewers section (placeholder) Nathan~~

f) Delete 33.19 **Hydrogenated Glycerides** as an energy source.– Brett

Brett Boswell moves to ACCEPT the recommendation to delete the definition. Mika second. MOTION PASSES.

About one year ago, Charlotte Conway brought before IDC that there was an error in drafting the definition (no use rate limitation). The error is being addressed by creating the new definition T73.311. In an effort to broaden the use rate, industry provided some information/data; however, it was not enough to support all uses/use rates. Therefore, she would like to delete this definition and come up with another definition that is supported with the appropriate data. Charlotte Conway suggest having a call with interested individuals to go over the data gaps. She will post a meeting notice in to IDC team board.

Leah Wilkinson from AFIA stated that industry appreciates FDA's help in fixing the definition and the IDC for being patient to get the definition right. No one wanted to be in this position. Industry has been trying to get the supporting information/data to FDA. AFIA has reservations in deleting this definition. AFIA is working on gathering the data to support the energy source use and requests that the definition not be deleted at this time.

Kristi Smedley supports AFIA's position. She stated that there are products on the market that would be affected if this definition were to be deleted.

Jan Campbell supports AFIA's and Kristi Smedley's positions. She stated that they have been using the product as an energy source for the past 5 years and haven't seen any safety issues.

Richard Ten Eyck stated that if the IDC accepts the deletion, the deletion would have to go through the normal channels (voting on by the Board and the membership).

The safety concerns are related to nickel and other contaminants. FDA does not have data to support safety at the higher use levels that are associated with the use as an energy source. There may be enough information in the literature, but FDA doesn't have the time to conduct this search.

Kristi Smedley agrees that this deletion will take some time but cautioned that the replacement will also take time to be implemented.

Erin Bubb asked when did this come up for deletion and how long has this been going on? It has been at least one year (August 2017). FDA received additional supporting data in December 2017, but the safety assessment did not address the higher use rate when used as an energy source. Charlotte Conway stated that FDA has finished the safety review to expand the technical use include coating.

g) 36.14 Nomenclature update – Maggie

Maggie moves to ACCEPT the recommendation to make an editorial change to update 36.14 with the new and old names and the compliance dates. Mika Alewynse second. MOTION PASSES.

h) T57.167 Manganese Hydroxychloride – Jennifer Kormos

Jennifer Kormos moves to ACCEPT the recommendation to publish the definition as tentative. Ali Kashani second. MOTION PASSES.

Cathy Alinovi expressed concerns regarding the heavy metals, which are toxic to all animals and will accumulate in the animals. Kristi Smedley stated that this definition is consistent with the AFFCO guidance on contaminants and has less heavy metals than specified by the guidance.

A question was asked regarding use level in premix and then in the final feed? Ali Kashani stated that the manganese levels are very low. Kristi Smedley agrees with Ali Kashani and stated that like all ingredients this product should be used only at levels decided by a nutritionist.

i) T60.117 (B) Black Soldier Fly Larvae -edit to add poultry- Erin
Erin Bubb moves to ACCEPT the recommendation to edit the tentative definition. Dave Phillips second. MOTION PASSES.
Erin Bubb recommends an editorial change to add "and poultry" to the tentative definition. The association membership did not vote on the recommendation to have the definition official yet. This modification would become official in January after board/membership vote.
Kent Kitade asked if this is more than an editorial change and if more information would need to be given to FDA. Kristi Smedley stated the supporting information has already been provided to FDA. There is a letter from CVM to accept the addition of "and poultry" to the definition.

j) T73.311(A) Hydrogenated Glycerides – Richard
Brett Boswell moves to ACCEPT the recommendation to publish the definition as tentative (T73.311(A)). Mika second. MOTION PASSES.
Charlotte Conway stated that this was a very late addition and that it was only sent to Richard Ten Eyck this morning. She has been working on getting all the supporting information and to finish the safety assessment. She would like for this tentative definition to move forward but understands if the IDC would like more time to review.
Leah Wilkinson encouraged the IDC to vote on this since it includes additional intended uses and given the previous action to delete the original definition. Kristi Smedley expresses the same as Leah Wilkinson, but also wondered what happens if it is waits to January. Richard Ten Eyck stated that there is another definition that is ready to move to official for hydrogenated glycerides but it does not contain these edits.

k) T73.401 Colored Graphite Tracer – Richard
Mika Alewynse moves to ACCEPT the recommendation to publish the definition as tentative. Ali Kashani second. MOTION PASSES.

l) Table 101.1 AGRN 24 L-Methionine 90% - Nathan
Nathan Price moves to ACCEPT the recommendation to add AGRN 24 to Table 101.1. Ali Kashani second. MOTION PASSES.
Dave Edwards if you look at the investigator there is a link to the GRAS Notice and it should be added. (done)

~~m) Update Chapter 6 header to clarify ODI nomenclature (placeholder)~~

n) Edit the comma out of OP common names (list provided) – Phillips
Tabled to October 19, 2018 webinar.

o) Update Guidelines document in chapter 6 (placeholder)
Tabled to October 19, 2018 webinar.

p) Vitamin names (placeholder) – Tom
i) Vitamin A
ii) Vitamin C
iii) Vitamin E
Tom Phillips would like a general definition for all forms of these vitamins that are used in animal food. IDC Consideration of these definitions will be moved to January 2019 meeting. Tom Phillips is looking for help on wordsmithing these definitions. Jim Barritt stated that PFI has worked on these vitamins and will provide what they have to support these definitions.

q) **90.9 25-hydroxyvitamin D_3** (late add 10/1/18) – Tom / CVM
Tom Phillips moves to ACCEPT the recommendation to publish the definition as official. Mika Alewynse second. MOTION PASSES.
Dave Edwards stated this is a new food additive regulation.
Mika Alewynse suggested to add the definition in a more complete sense instead for just adding it to the table, due to the toxicity that can occur in turkeys.
Richard Ten Eyck stated that an official definition number is needed. Additionally, "Proposed" needs to be changed to "adopted 2019 revision 1". This will be reformatted to match the rest of the OP.
Dave Dressler asked if this needs to be removed from Table 90.25? Kristi Smedley stated that the table is the GRAS affirmed use for broilers (affirmed GRAS use), which is different than this use. It should not be removed from the table. Mika Alewynse stated that it may be possible to move from the table to this definition. FDA work with Tom Phillips on editorial changes to make sure all uses are in on place. Dave Dressler would like to see what it looks like before

voting on this definition. Richard Ten Eyck asked if the IDC can move forward with this definition and then make the changes to merge the two at a later date. Kristi Smedley state that she agreed with this approach and was supported by Charlotte Conway and Leah Wilkinson. FDA and Tom Phillips will work on a new definition that merges intended uses for the two for January meeting.

5) Discussions:
   a) **Hemp** Update – Bob C. & Brett B., Scott Z. // *9/7/18 no change in status, not approved for animal feeding //* direct questions to Bob or Brett.
      Tabled to October 19, 2018 webinar.
   ~~b) GRAS policy discussion – Doug Lueders~~
   ~~c) Status on high profile ingredients (if needed) – Richard / CVM~~
   ~~d) Discussion of common human foods in pet food (placeholder)~~
   ~~e) Any activities needing 19 - 20 Association funding?~~
   f) Set Webinar **meeting dates** for:
      i) October 19, 2018
      ii) April meeting needs to be set
   g) Next Meeting, AAFCO Midyear, Savannah Georgia, January xx 2019 The committee will meet by webinar 10/19/18 at 11:30AM PST to address issues tabled during this meeting.

Meeting was adjourned at 11:05 am PST.
Minutes approved 10/19/18 by 21 committee members

Appendix A: IDC 10/5/18 Meeting

Table 36.14 edits:

**Enterococcus faecium* Delete "*"

Enterococcus intermedius* new text to follow ", correct to *Streptococcus intermedius*"

Enterococcus thermophilus* new text to follow ", correct to *Streptococcus thermophilus*"

There would be text at the end of the definition that states "** date of compliance January 2022". The same date would be used for these changes.

T57.167 Manganese Hydroxychloride is the reaction product of manganese oxide and hydrochloric acid at the appropriate stoichiometric ratio, having the empirical formula $Mn_2(OH)_3Cl$. Particle size must not exceed 100 microns. It must contain not less than 44% manganese and is intended to be a source of manganese for use in livestock, poultry, and companion animal diets. It must not contain more than 20% chloride, 50 ppm lead, 50 ppm arsenic, 10 ppm cadmium, and 0.5 ppm mercury.

T73.311 (A) Hydrogenated Glycerides are obtained by hydrogenation of animal fats or vegetable oils and are used as **a coating agent for ingredients or** a binder and lubricant in pelleting of feed (pelleting aid) of all animal species**. The** maximum use rate of **hydrogenated glycerides is** 4 lb per ton of **complete** 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."

T73.401 Colored Graphite Tracer are the particles resulting from the milling of naturally occurring graphite coated with a color additive(s) approved for use in animal food. The graphite must be of feed grade material and may be used in animal food as a colored tracer for other ingredients or premixes present in a finished animal food. The inclusion level of the tracer must not exceed 50 ppm in the finished food. The label shall include a caution statement indicating the maximum permitted inclusion level.

90.9 25-hydroxyvitamin D_3—The food additive 25-hydroxyvitamin D_3 may be safely used in accordance with the following prescribed conditions:

(a) The additive is used or intended for use as a source of vitamin D_3 activity in animal feed or drinking water in accordance with good manufacturing and feeding practices as follows:
  (1) In feed or drinking water of layer and breeder chickens not to exceed 69 parts per billion (ppb) in feed or 34.5 ppb in drinking water.
  (2) In feed or drinking water of turkeys not to exceed:
    (i) 92 ppb in feed; or
    (ii) in drinking water, 25 ppb for turkeys up to 3 weeks of age, 36 ppb for turkeys from 4 to 11 weeks of age, or 45 ppb for turkeys over 11 weeks of age.

(b) The additive consists of not less than 94 percent 25-hydroxyvitamin D_3 (9,10-secocholesta-5,7,10(19)-triene-3β, 25-diol).

(c) The additive meets the following specifications:
  (1) Not more than 1 percent of any individual sterol.
  (2) Not more than 5 percent water.
  (3) Not more than 20 parts per million (ppm) lead.
  (4) Not more than 20 ppm aluminum.
  (5) Not more than 1.0 percent solvents and non-detectable levels of 2', 4', 5', 7' tetraiodofluorescin.
  (6) Not more than 1 ppb 1,25-dihydroxycholecalciferol.

(d) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling shall contain:

(1) The name of the additive.
(2) A statement to indicate the maximum use level of 25-hydroxyvitamin D_3 must not exceed 69 ppb in feed or 34.5 ppb in drinking water for layer and breeder chickens.
(3) A statement to indicate for turkeys the maximum use level of 25-hydroxyvitamin D_3 must not exceed 92 ppb in feed; or in drinking water, 25 ppb for turkeys up to 3 weeks of age, 36 ppb for turkeys from 4 to 11 weeks of age, or 45 ppb for turkeys over 11 weeks of age.
(4) Adequate use directions to ensure that 25-hydroxyvitamin D_3 (and all premixes) is uniformly blended throughout the feed or drinking water.
(5) An expiration date on all premix labeling.
(6) A statement on all premix labeling (feed and drinking water forms) that 25-hydroxyvitamin D_3 cannot be used simultaneously in both feed and water.

21 CFR 573.550

Addition to table 101.1

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)
24 (PDF - 194 pages)	CJ CheilJedang Corporation	L-methionine 90% produced by a bioengineered *Escherichia coli* K-12	L-methionine 90%	To be used as a nutrient in animal food.	All animals	8/17/2017	FDA has no questions. (PDF - 4 pages)

Ingredient Definitions Committee 10/19/2018 Meeting

Committee Recommendations

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

1) Delete Definition T73.311 **Hydrogenated Glycerides** if T73.311 (A) is accepted by Association membership.
2) Publish in the OP a new Official Definition for 90.9 **25-hydroxyvitamin D_3** reflecting edits on 10/19/18 to combine all intended uses and remove the alternate name. (Replaces the recommendation from the 10/5/18 IDC meeting.)

Board Recommendations

Report accepted December 17, 2018
Board accepted committee recommendations 1–2

Association Recommendations

To be considered in January 2019

Edits to the OP. No need for further Association action:

1) Editorial Change: "Common and Usual" on page 352 & 510 (2019 OP) to the correct terminology of "Common or Usual".
2) Edit vitamin table 90.25 to remove 25-hydroxyvitamin D_3 once the Association accepts definition 90.9

Committee Minutes

The meeting was convened at 11:33 am PST via webinar by Chairperson Richard Ten Eyck.

1) Roll Call of Committee members
   Richard Ten Eyck, Erin Bubb, David Beard, Brett Boswell, Ken Bowers (via proxy - Erin Bubb), Bob Church (via proxy – Dave Phillips), Dave Dressler, James Embry, Maggie Faba, George Ferguson, Jacob Fleig, Steve Gramlich, Ali Kashani, Dan King, Mark LeBlanc, Rick Manthei, Dave Phillips, Tom Phillips, Nathan Price, Laura Scott, Mika Alewynse (voting member for FDA), Charlotte Conway (no vote), Kent Kitade (no vote), Jennifer Kormos (no vote)
   A quorum was present 21/25.
2) Accept Minutes from 10/5/18 IDC meeting
   Jacob Fleig (via BIN) moves to ACCEPT the minutes. Brett Boswell (via BIN) seconds. MOTION PASSES.
3) Investigator recommendations to move tentative to official or not?
   a) T73.311 Hydrogenated Glycerides – Yes, Richard
      Jacob Fleig moves to ACCEPT recommendation to delete the definition if T73.311 (A) is accepted by association membership. Steve Gramlich seconds. MOTION PASSES.
      Richard Ten Eyck and Leah Wilkinson from AFIA ask if there are any issues for States to accept the tentative definition. Kristi Smedley agreed with only having one tentative definition and asked if T73.311(A) can go official instead of in as tentative. Richard Ten Eyck stated that the minutes from the October 5th webinar have it as tentative and asked if it would be the preference to bring it in as official. Kristi Smedley stated that it would fulfill the requirements for the States that require official definitions. Idaho requires official definitions. Tom Phillips states that they have some regulatory discretion but does rely on the official definitions. Charlotte Conway asked if there was a lot of concern to remove the tentative process in the survey. George Ferguson stated that the IDC does not represent all the States.
4) New Definitions, deletes & edits:
   a) Update Chapter 6 header to clarify ODI nomenclature
      i) Editorial Change: "Common and Usual" on page 352 & 510 (2019 OP) to correct language of "Common or Usual" - Richard
         Mika Alewynse moves to ACCEPT the recommended editorial change. Ali Kashani seconds. MOTION PASSES.
   b) Edit the comma out of OP common names (list provided in BIN) – Phillips
      This topic was discussed, but no motion was made. Revisit the topic if needed after ODI is launched.

c) Update Guidelines document in chapter 6 – Sue
   i) Discuss the length of tentative first
      The topic was discussed, but no motion was made. Committee will discuss again in January. Members should forward questions to the workgroup so the document can be ready for voting at midyear.
d) Vitamin names (placeholder) need recommendations – Tom
   i) Vitamin A
   ii) Vitamin C
   iii) Vitamin E
   No proposal ready for discussion today.
e) 90.9 25-hydroxy vitamin D_3 – Tom / CVM
   Tom Phillips moves to strike Calcifediol text from the language. Mika Alewynse second. MOTION PASSES.
   Tom Phillips moves to ACCEPT the replacement of the definition that was voted on in the October 5, 2018 webinar with this amended definition as official. Erin Bubb seconds. MOTION PASSES.
   New language was prepared that merge the two CFR definition. Proposes intended use for all chickens and adds an alternative name, calcifediol. Charlotte Conway stated that FDA is not in favor of adding in the alternative name. Leah Wilkinson asked if this was reviewed by the Firm that sponsored the food additives (same Firm both food additives). Tom Phillips asked if this should be tabled until the Firm can be consulted. Mika Alewynse stated that the Firm has seen the CFR (part of the FAP process). There was discussion on whether to add the alternative name, calcifediol, or not. It was decided not to add the language, and the proposed definition would be amended to remove it.

5) Work Group Reports
   a) GRAS verification workgroup report – Sue Hays
      Next committee meeting is on the October 29th. The workgroup will have an update at the IDC meeting January.
   b) Non-Defined List Workgroup - Kent Kitade
      No Update was provided.
   c) Confusing Pet Food Names Workgroup – Brett Boswell
      No actions are ready for committee consideration.
   d) Guidelines For requesting Definitions Editing Workgroup – tbd
      Discussed during agenda item 4(c).
   e) ODI Subcommittee? (new) – tbd
      Richard Ten Eyck thought that there might be a need for a communication bridge between the IDC and Feed Labeling Committee for ODI topics and thought that this might be handled by a new subcommittee. Dave Phillips stated that an ODI work group in feed labeling committee needs to be formed and expects it to be formed in the next month or so. No action taken by IDC.

6) Discussions:
   a) **Hemp** Update – Bob C. & Brett B., Scott Z. // *9/7/18 no change in status, not approved for animal feeding //* direct questions to Bob or Brett.
      Brett Boswell stated there has been no change in status. Richard Ten Eyck had a question from an Oregon feed mill asking if they can put it in horse feed. People are still trying to use hemp, but there have been no approvals for use in animal food.
   ~~b) GRAS policy discussion – Doug Lueders~~
   ~~c) Status on high profile ingredients (if needed) – Richard / CVM~~
   ~~d) Discussion of common human foods in pet food (placeholder)~~
   ~~e) Any activities needing 19 - 20 Association funding?~~
   f) Set Webinar **meeting dates** for:
      i) April XX 2019
   g) Next Meeting, AAFCO Midyear, Savannah Georgia, January 22, 2019 10:30AM EST

Meeting adjourned 12:53 pm
Minutes approved 11/7/18 by a vote of 13/25 committee members with one abstain.

Appendix A: IDC 10/19/2018 Meeting

90.9 25-hydroxyvitamin D_3

The food additive, 25-hydroxyvitamin D_3, may be safely used in accordance with the following prescribed conditions:

(a) The additive is used or intended for use as a source of vitamin D_3 activity in animal feed or drinking water in accordance with good manufacturing and feeding practices as follows:
  (1) In feed or drinking water of ~~layer and breeder~~ chickens not to exceed 69 parts per billion (ppb) in feed or 34.5 ppb in drinking water.
  (2) In feed or drinking water of turkeys not to exceed:
    (i) 92 ppb in feed; or
    (ii) in drinking water, 25 ppb for turkeys up to 3 weeks of age, 36 ppb for turkeys from 4 to 11 weeks of age, or 45 ppb for turkeys over 11 weeks of age.

(b) The additive consists of not less than 94 percent 25-hydroxyvitamin D_3 (9,10-secocholesta-5,7,10(19)-triene-3β, 25-diol).

(c) The additive meets the following specifications:
  (1) Not more than 1 percent of any individual sterol.
  (2) Not more than 5 percent water.
  (3) Not more than 20 parts per million (ppm) lead.
  (4) Not more than 20 ppm aluminum.
  (5) Not more than 1.0 percent solvents and non-detectable levels of 2', 4', 5', 7' tetraiodofluorescin.
  (6) Not more than 1 ppb 1,25-dihydroxycholecalciferol.

(d) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling shall contain:
  (1) The name of the additive.
  (2) A statement to indicate the maximum use level of 25-hydroxyvitamin D_3 must not exceed 69 ppb in feed or 34.5 ppb in drinking water for ~~layer and breeder~~ chickens.
  (3) A statement to indicate for turkeys the maximum use level of 25-hydroxyvitamin D_3 must not exceed 92 ppb in feed; or in drinking water, 25 ppb for turkeys up to 3 weeks of age, 36 ppb for turkeys from 4 to 11 weeks of age, or 45 ppb for turkeys over 11 weeks of age.
  (4) Adequate use directions to ensure that 25-hydroxyvitamin D_3 (and all premixes) is uniformly blended throughout the feed or drinking water.
  (5) An expiration date on all premix labeling.
  (6) A statement on all premix labeling (feed and drinking water forms) that 25-hydroxyvitamin D_3 cannot be used simultaneously in both feed and water.

21 CFR 573.550, 584.725 (Adopted 2019 ver 1)

Inspection and Sampling Committee Report

2018 Annual Meeting
July 30, 11:00 am–12:00 pm, Fort Lauderdale, Florida

Committee Recommendations: None at this time.

Board Recommendations: Report accepted October 24, 2018

Association Recommendations: None

Committee Action Items

1) Aseptic Sampling Work Group Charge: to evaluate current protocols for aseptic sampling. The group includes the following members: Miriam Johnson (Lead) – NC; Tim Lyons – MI; Stevie Glaspie – MI; Ethan Willis – MO; Jacob Fleig – MO; Kevin Klommhaus – FDA; Jan Campbell – NGFA; Stephanie Adams – AFIA
2) AAFCO Inspectors Manual FSMA Alignment Work Group Charge – to review the AAFCO Feed Inspector's Manual to ensure it aligns with FSMA requirements. The group includes the following members: Kevin Klommhaus (Lead) – FDA; Brett Groves – IN; Jim True – KY.
3) Sampling Study RFP Work Group Charge: Write a Request for Proposal in which current sampling methods will be re-validated through independent peer reviewed research. Once the RFP is approved by the Inspection and Sampling Committee it will be sent out to the appropriate venues for proposal to conduct the study. The group includes the following members: Miriam Johnson (Lead) – NC; Bob Geiger – IN; Jenny Combs – KY; Samantha Moran – CA; Aaron Price (Lab Methods & Services Committee Representative) – CAN.
4) AITS & BITS Alignment Work Group Charge: Review current guidance document for hosting AITS & BITS and establish a consistent curriculum for future AITS seminars. The group includes the following members: Miriam Johnson (Lead) – NC; Jessica Gore – NC (POC for AITS); Chad Linton – WV; Brett Groves – IN; David Dressler – PA; Amanda Anderson – KS; Eric Brady – TN; Barb Schroeder – MN; Kevin Klommhaus – FDA; Stephanie Adams – AFIA.

Committee Participants

Members Present: Miriam Johnson – NC (Committee Chair); Chad Linton – WV, Stan Cook – MO; Bob Church – MT; Brett Groves – IN; Wayne Nelson – CT; David Dressler – PA; Laura Scott – CAN; Jim True – KY; Jacob Fleig – MO; Kevin Klommhaus -FDA; Tim Lyons- MI; Jenny Combs – KY; Ethan Willis – MO
Members Present Via Telephone: None
Advisors Present: Meghan Dicks – AFIA; Jan Campbell – NGFA; Chris Olinger – NGFA; Stephanie Adams – AFIA
Others Present: Amanda Anderson – KS (Education and Training Committee Representative); Sue Hays – AAFCO Executive Director

Committee Report

Miriam Johnson (Committee Chair) called the meeting to order at 11:04 AM EST. Members and advisors in the room introduced themselves.

Aseptic Sampling Work Group – Tim Lyons, MI

A work group was formed during the 2017 Midyear Meeting in Mobile, AL to address missing procedures for bulk aseptic sampling in the sampling procedures section of the AAFCO Feed Inspector's Manual.

Work Group Update:

The work group has been reviewing the Aseptic Sampling sections of both the AAFCO Feed Inspector's Manual and the FDA IOM, along with other gathered aseptic sampling SOP's from industry and regulatory groups. The workgroup continues to determine the direction in which the updates/revisions need to follow. How to avoid cross contamination of the sample and the equipment, chain of custody, maintaining sample integrity, and additional considerations the group deems necessary are all topics being considered for updates to the AAFCO Inspectors Manual. The work group feels that will have a draft for the committee by the next annual meeting.

Work Group Members: Miriam Johnson (Lead) – NC; Jacob Fleig – MO; Tim Lyons – MI; Stevie Glaspie – MI, Ethan Willis – MO; Kevin Klommhaus – FDA Advisor; Jan Campbell – NGFA; Stephanie Adams – AFIA

AAFCO Feed Inspector's Manual and FSMA Alignment – Kevin Klommhaus, FDA

Work Group Update:

A review of the AAFCO Feed Inspector's Manual is continuing to be performed to ensure it is aligned with the requirements of FSMA. The work group is continuing to make the updates and will have newly formatted proposed additions for the committee soon.

Work Group Members: Kevin Klommhaus (Lead) – FDA; Brett Groves – IN; Jim True – KY

AAFCO Sampling Study – Jenny Combs, KY

Work Group Update:

Since the Annual Meeting held in Bellevue, WA in August of 2017 a work group was formed to create a Report for Proposal to conduct a sampling study. The charge of the work group is to write a Request for Proposal in which current sampling methods will be re-validated through independent peer reviewed research. Once the RFP is approved by the Inspection and Sampling Committee and the Board of Directors, it will be sent out to the appropriate venues for proposal to conduct the study. This workgroup will not write the parameters around how to conduct the study but instead determine the data we would like to collect from the study. Discussion from the work group revealed the RFP created will request a study that evaluates our current bagged feed sampling technique, for various feed types (ex. Crumbles, textured, pellet, mash product, etc.) using the single tube trier sampling probe. The analytes the workgroup is proposing to be tested include Protein, a nutrient similar to Calcium or Phosphorus, and a micro analyte such as Zinc. The RFP will continue to be revised and worked on until the group feels that it is ready to be sent to the committee for review. No time frame is set for distribution to the committee.

Discussion from the Audience:

Nancy Thiex – Life Member, Aaron Price – CAN

Comments to the committee included: the time needs to be taken to assure that we are writing the RFP to assure that it is clear how we want the feeds to be sampled, collected, and tested. We need to make sure that the work group doesn't create a study that is not useful and we want to be assured that we have a diversified group that can create a useful RFP.

Work Group Members: Bob Geiger – IN; Jenny Combs – KY; Samantha Moran – CA; Aaron Price – CAN (Lab Methods & Services Committee Representative)

AITS Seminar Review – Amanda Anderson, KS

AITS 2018 was hosted by MO and KS in Kansas City, MO in June of 2018. The AITS had 42 attendees from 15 different states. This was the first time that AAFCO used CLEAR as a major presenter, and the reviews from the attendees were good. The cadre will work at reviewing and improving the curriculum for future trainings.

Update from the Education and Training Committee Meeting:

The Alabama Department of Agriculture has offered to host the 2019 AITS seminar in mid-June 2019. Further information will become available as received.

BITS Seminar Review – Brett Groves, IN

The 2018 BITS seminar will be hosted by the Pennsylvania Department of Agriculture. The dates for the seminar are September 25-27, 2018. The draft agenda is available on the AAFCO website with the deadline for registration being August 31, 2018.

AITS & BITS Alignment Workgroup – Miriam Johnson, NC

Workgroup Update:

A workgroup was formed prior to the Midyear Meeting in Anaheim, CA 2018. The charge of the work group is to review current guidance documents for hosting AITS and BITS and establish a consistent curriculum for future AITS seminars. The work group is in discussion with CLEAR to create a customized portion of the curriculum specific to feed investigators and will be working with the Education and Training Committee to solidify topics covered. A draft curriculum for AITS with the following topics was presented to the committee: Sampling, Feed Manufacturing, GMP/Record Review, Trace Back/Trace Forward, Label Review including Medicated Labels, Feed Stuffs, CLEAR. A request for volunteers/cadre members was made to the association to fill the need for speakers and to work towards creating the materials that will be presented during future seminars.

The committee is asking for interested people to deliver all topics outlined in the curriculum and to serve a minimum of 3-years, or longer if so desired. If a person is interested, please contact Miriam Johnson to discuss. A question was posed if the BOD will support and finance the travel of cadre members. Board

member and ISC liaison, Bob Church, stated that he will be taking this question to the BOD for clarification.

Workgroup Members: Miriam Johnson (Lead) – NC; Chad Linton – WV; Brett Groves – IN; Eric Brady – TN; Amanda Anderson – KS; Barb Schroeder – MN; Dave Dressler – PA; Stephanie Adams – AFIA

Other Business: None

No further discussion or topics were brought to the attention of the committee and the meeting was adjourned at 11:54 am EST.

Action Item Table

Responsible	Item	Action	Timing / Status
Work Group	AAFCO Feed Inspector's Manual	Develop protocol for techniques of aseptic sampling and update AAFCO Inspector's Manual	August 2019
Work Group	AAFCO Feed Inspector's Manual	Ensure the manual aligns with FSMA requirements	January 2019
Work Group	Sampling Study RFP	Develop Report for Proposal for Sampling Study	Unknown
Work Group	AITS Guidelines & Curriculum	Update and Standardize AITS Guidelines & Curriculum	June 2019

Laboratory Methods and Services Committee Report

2018 Annual Meeting
July 31, 8:00 am–5:00 pm, Fort Lauderdale, Florida

Committee Recommendations: None

Board Recommendations: Report accepted October 24, 2018

Association Actions: None

Committee Participants

Members Present: Aaron Price, CFIA; Nancy Thiex, Life Member; Josh Arbaugh, West Virginia Dept. of Agriculture; Ametra Berry, Georgia Dept. of Agriculture; Deepika Curole, LSU Dept. of Ag Chemistry; Teresa Grant, North Carolina Dept. of Agriculture; Casey Guccione, Kansas Dept. of Agriculture; Dominika Kondratko, Colorado Dept. of Agriculture; H. Dorota Inerowicz, Office of the Indiana State Chemist; Patty Lucas, FL Dept. of Ag and Consumer Services; Kristi McCallum, Colorado Dept. of Agriculture; Louise Ogden, Life Member; Lise-Anne Prescott, CFIA; Brenda Snodgrass, Oklahoma Department of Agriculture; Robert Sheridan, New York Dept. of Agriculture; Michele Swarbrick, Minnesota Dept. of Agriculture; Lei Tang, FDA CVM; Hemakanthi De Alwis, FDA CVM; Sharon Webb, University of Kentucky Regulatory Services; Srinivasulu Chigurupati, FDA ORA; Maryam Khosravifard, CA Dept. of Food & Agriculture; Manisha Das, FDA CVM; Mark LeBlanc, LA Dept. of Agriculture; Gale Hagood, Mississippi State Chemical Laboratory; Jason Kong, Ohio Dept. of Agriculture; Kenneth McManus, Maryland Dept. of Agriculture; Tom Phillips, Maryland Dept. of Agriculture; George Ferguson, AAFCO Board Liaison; Ruiqing Pamboukian, FDA Liaison
Advisors Present: Kyle Bennett, Neogen; Paul Mostyn, Westway Feed; Andy Crawford, Consultant; Jeff Horst, Agri-King; Lars Reimann, Eurofins; Ken Riter, Nestle-Purina Analytical Labs; Lisa Ruiz, Eurofins NAC; Leo Schilling, Eurofins; John Szpylka, Mérieux NutriSciences

Committee Report

1) Call to Order
   The Agenda was approved with minor changes.
   Introductions – sign-up sheet circulated to participants
2) Committee Roster was reviewed and updated. Kristi McCallum will add additional updates as needed.
3) FDA Cooperative Agreement – Robin Randolph of APHL gave a presentation, highlighting the following.
   - APHL is continuing work started under the Association cooperative agreements through a 2-year bridge agreement with FDA.
   - PFP Lab Best Practices manual coming soon.
   - Lessons learned from first labs transitioning over to 2017 standard are being captured to assist other labs facing the transition.
   - Consultant (Yvonne Salfinger) has continued helping labs without funding
   - Training assistance provided to FDA's genome tracker labs (Bioinformatics Training).
   - Assistance for eLEXNET representation on eLEXNET steering committee.
     The CoAg is currently operating on a no cost extension from our first cooperative agreement with FDA. Efforts include Feed Laboratory Curriculum Framework, *GOODSamples* training, and *GOOD Test Portions* publication and training. Beginning 9/1/2018, continuing work on Laboratory Framework development, competency development, and beginning developing courses.
4) Update from FDA – Abe Brown from FDA gave an update on the Laboratory Flexible Funding Model (LFFM)
   - FDA/APHL/State Partners
   - Funding Vehicle- Just awarded on human food side.
   - Apply to consolidation program- provides funding/ flexibility for picking from several program area needs.
   - Developing one for the laboratory.

- Combine multiple cooperative agreements into one funding vehicle.
- Funding Opportunity Announcement (FOA) - Lab flexible funding. New awards in spring 2020.
- Targeted to FDA needs and work with state partners.
- The scope of LFFM is to include FERN, Genome, ISO supported MRPS and AFRPS, RRT (Rapid Response Team) and Sampling Contracts. Eligibility and criteria outcome based on metrics, based on analytical needs of FDA. Dependent upon individual lab capacity and capability.

5) FSMA Implementation – Robert Sheridan and Teresa Grant provided an update that the FDA document includes methods for various contaminants, etc. This document doesn't reference new or suggested tolerance levels. List has been put out; or is someone doing risk assessment of results. The draft document will be released for comments.
6) State Feed Lab Network (Potential Survey) – Nancy Thiex and Aaron Price stated that a white paper was submitted on the laboratory network centers of excellence. The AAFCO Board of Directors assigned a working group to survey state labs and programs to determine the current state of lab capability and what are the desired capabilities. Some survey question suggestions include:
   - Do you have a lab, and what percent of needs are handled by your lab versus a private lab?
   - Where is expertise disappearing?
   - Microscopy, other older methodologies?
   - What future testing needs do you anticipate as a result of FSMA?
   - Analytical tables for labs to mark which analyses they perform
   - Are AOAC OMA methods required?
7) Working Group updates
   a) Tylosin – Leo Shilling will give an update at the mid-year meeting in January 2019. Leo will follow-up on progress with Casey Guccione.
   b) CTC – Leo Shilling presented data on the CTC HPLC/FL detection method. This method research was performed primarily on poultry feed and fish food samples. Leo will obtain a wider variety of samples from Sharon Webb in KY. Issues with the mobile phase were discussed and Leo has modified the method to address these issues.
   c) Fat soluble vitamins – Dorota Inerowicz and Ken Riter will perform a single laboratory study to determine minimum sample size. The study will include measuring particle size of vitamin premixes to be used as a guide on theoretical sample weight needed for vitamins.
   d) Multi-element (mineral) analysis – Robert Sheridan, Sharon Webb, Michelle Swarbrick and LiseAnn Prescott reported that the Metals Working Group is currently working on a "Metals in Feed Guidelines". The chapter titles have been determined and Lise-Anne Prescott presented the outline of the guidelines. The committee will continue to have monthly conference calls so that more progress can be made. An update will be presented at the Mid-year Meeting in 2019.
   e) Sugar method – J. Horst and D. Berg reported that the method is with AOAC for final adoption.
   f) Mycotoxin – Robert Sheridan reported on an EU method for detection of mycotoxins in feed by LCMSMS. This method has been multi-lab validated by 31 labs in an extensive collaborative study. Several laboratories were interested in this method. The extraction is very similar to the NY method and the analytes are the same except Aflatoxin B2, G1 and G2 are not included. Robert will forward this multi-lab validation study to interested laboratories. Aaron Price suggested that the committee look at above study results; if EU method meets the needs, this would be a good method to suggest for use for labs that need a method.
   g) Best practices – Larry Novotny gave a presentation on best practices for determining the N-Protein Conversion Factor. The recommended method to determine the correct protein content is a complete amino acid analysis. Because most laboratories do not have the capability to perform amino acid analysis, the correct conversion factors have been listed in the N Best Practices document, which was circulated and posted on the AAFCO website.
   h) Dr. Jane Caldwell presented the validation of loss on drying methods in pet foods for the moisture best practices group. Ken Riter also shared Nestle Purina results for moisture and the oven and Karl Fischer methods showed good data agreement. More work needs to be done to resolve moisture issues in pet food. Volunteers are needed for this workgroup. Contact Larry Novotny if you are interested.
   i) Fiber best practices recommendations:
      - Fiber needs to be defined by an adjective when on a label.
      - Replace crude fiber with neutral detergent fiber on animal feed labels.

- Dietary fiber is being recommended by the Pet Food Modernization Working Group as the choice of fiber method for labeling pet foods and feeds for non-ruminant animals.

j) Lab Sampling Update – Nancy Thiex gave a presentation of *GOOD Test Portions*. This document is available on AAFCO website and is free. It is suggested that all laboratories read and understand this document. There was a brainstorming session on how laboratories can change practices in their laboratories.

8) Mycotoxin best practices – Nancy Thiex gave an update on this work group. Goal for the group is to produce scientifically supported, publishable best practices recommendations. The working group is very large. The following people are currently taking lead roles in developing best practices documents.

Kyle Bennett	Test kits
Bob Sheridan & Sharon Webb	Instrumental analyses
Lei Tang	Regulations

9) Update on AOAC method for sugars and fructans – Nancy Thiex described the status of these methods within AOAC. Three sugar methods and one fructan method will be considered by an Expert Review Panel at the upcoming AOAC Meeting in Toronto.
10) Lab curriculum framework update – Chris Weiss of IFTPI gave an update. The committee has been working on the curriculum framework with AAFCO for ~ 5 years. This work is being done jointly with APHL, AFDO, AAFCO, FDA, OTED and IFPTI. The goal is to develop a competency framework for US state human and animal food labs. The committee is now working on mid-level core competencies. All competencies and performance indicators are built out for the Entry Level Core Competency areas. Course design documents were delivered to APHL.
11) Quality Assurance Subcommittee update – Srinu Chigurupati and Kristi McCallum played a taped webinar by J. Weitzel on "What's new with ISO17025:2017". Kristi McCallum gave an update on the APHL "Collaborate Board" where labs can ask questions and receive answers from other labs. The APHL website also has many resources available to labs seeking ISO17025 accreditation including a PT Provider list, SOPs, and a new Reference Material List.
12) FDA Presentation on Antibiotics in Distiller's Grains - Hemakanthi De Alwis of FDA CVM gave a presentation on the LC-MS/MS method developed at FDA for the presence of certain antibiotics in distiller's grains to address concerns of antimicrobial resistance development.
13) Ergot Alkaloid Test Method Development and Validation – Lise-Anne Prescott of CFIA gave a presentation on the method development and validation for the detection of ergot alkaloids in feed by LC-MS/MS.
14) Brainstorming Session on the Future of the Lab Methods and Services Committee – Nancy Thiex and Aaron Price have stepped down as co-chairs of this committee. Kristi McCallum and Sharon Webb have agreed to co-chair the committee. Dorota Inerowicz and Robert Sheridan also agreed to assist with the organization, agenda and planning for this committee. Discussion took place as to the direction of future meetings, methods needs, updates on surveillance data from State labs.
15) Round table discussion – There was a discussion as to improving the sound quality for people calling in by phone to the meetings.
16) Adjournment

Action Item Table

Responsible	Item	Action	Timing / Status
K McCallum S Webb	2	Update committee roster based on recent changes and submit to AAFCO BOD	Submitted August 20, 2018
All committee members	7b	Consider whether you are able to assist L Schilling to run sample in your lab using the method developed. Contact Leo Schilling if you are interested	Before end of 2018

Appendix

Attachments:
For a list of presentations given during this meeting, please see the AAFCO Laboratory Methods and Services committee website at the following link:
https://www.aafco.org/Regulatory/Committees/Laboratory-Methods-and-Services#minutes

Attendee List

Last Name	First Name	Affiliation	E-mail	Present
Arbaugh	Josh	West Virginia Dept. of Ag	jarbaugh@wvda.us	X - Member
Bailie	Jenny	Milk Specialties	jbailie@milkspecialities.com	X
Bennett	Kyle	Neogen	kbennett@neogen.com	By phone - Advisor
Berry	Ametra	GA Dept. of Agriculture	ametra.berry@agr.georgia.gov	X - Member
Bloomer	Scott	American Oil Chemist Society	Scott.bloomer@aols.org	X
Blunt	Brittany	SC Dept of Ag	bblunt@scda.sc.gov	X
Boykin	Vickie	SC Dept of Ag	vboykin@scda.sc.gov	X
Brown	Abe	FDA	Abe.brown@fda.hhs.gov	X
Buchanan	Ellen	FDA	Ellen.buchanan@fda.hhs.gov	X
Caldwell	Jane	Midwest Laboratories	jcaldwell@midwestlabs.com	X
Chigurupati	Srinu	FDA	Srinivasulu.Chigurupati@fda.hhs.gov	X - Member
Crawford	Andy	AAFCO PTP	andy@crawford.org	X - Advisor
Curole	Deepika	LSU Dept. of Ag Chemistry	dcurole@ldaf.state.la.us	X - Member
Das	Manisha	FDA CVM	Manisha.das@fda.hhs.gov	X - Member
De Alwis	Hemakanthi	FDA CVM	Hemakanthi.dealwis@fda.hhs.gov	X - Member
Flowers	Sally	Nebraska Dept. of Ag	sally.flowers@nebraska.gov	X
Garavaglia	Tom	MI Dept of Ag	garavagliat@michigan.gov	X
Grant	Teresa	NC Dept. of Agriculture	teresa.grant@ncagr.gov	X - Member
Guccione	Casey	KS Dept. in Ag	casey.guccione@ks.gov	By phone - Member
Ha	Tai	Nebraska Dept. of Ag	tai.ha@nebraska.gov	X
Harrelson	Emily	LA Dept of Ag	eharrelson@ldaf.state.la.us	X
Horst	Jeff	Agri-King, Inc.	jeff.horst@agriking.com	X - Advisor
Huyghuesdespointes	Alexis	JH Smuckers	alexis.huyghuesdespointes@jmsmucker.com	X
Inerowicz	H. Dorota	OISC	inerowic@purdue.edu	X - Member
Ivers	Bo	SGS	Kevin.ivers@SGS.com	X
Johnson	Robin	MT Dept of Ag	robinjohnson@mt.gov	X
Kariuki	Solomon	UK Division of Reg	s.kariuki@uky.edu	X
Keavy	Brenda	WV Dept of Ag	BKeavy@wvda.us	X
Khosravifard	Maryam	CA Dept of Food & Ag	Maryam.khosravifard@cdafa.ca.goc	X
Koestner	Mary	Missouri Dept. of Ag	mary.koestner@mda.mo.gov	X
Kondratko	Dominika	CO Dept. of Ag	Dominika.kondratko@state.co.us	X - Member
LeBlanc	Mark	LA Dept of Ag	Mark_L@ldaf.state.la.us	X - Member
Lewis	Joice	LA Dept of Ag	jlewis@ldaf.state.la.us	X
Lucas	Patty	FL Dept of Ag & Consumer Services	Patricia.lucas@freshfromflorida.com	X - Member
McCallum	Kristi	CO Dept. of Ag	kristina.mccallum@state.co.us	X - Co-chair
Mostyn	Paul	Westway Feed	paulm@westwayfeed.com	X
Muenks	Quintin	MO Dept. of Ag	quintin.muenks@mda.mo.gov	X
Nichols	Matt	Neogen	Mnichols@neogen.com	X
Nichols	Melissa	MO Dept of Ag	Melissa.nichols@mda.mo.gov	X

Last Name	First Name	Affiliation	E-mail	Present
Nobo	David	KS Dept. in Ag	david.nobo@ks.gov	X
Novotny	Lawrence	SD - retired	lawrence.novotny@sdaglabs.com	By phone
Ogden	Louise	AAFCO	pt@aafco.org	By phone - Member
Potter	Tiffany	Spectrum Brands	Tiffany.potter@spectrumbrands.com	X
Prescott	Lise-Anne	CFIA	lise-anne.prescott@inspection.gc.ca	X - Member
Price	Aaron	CFIA	Aaron.Price@inspection.gc.ca	X - Member
Randolph	Robyn	APHL	Robyn.randolph@aphl.org	By phone
Reimann	Lars	Eurofins	larsreimann@eurofins.com	X - Advisor
Riter	Ken	Nestle-Purina Analytical Labs	ken.riter@purina.nestle.com	X - Advisor
Ruiz	Lisa	Eurofins NAC	lisaruiz@eurofins.com	X - Advisor
Rygiel	Teresa	FL Dept. of Ag	theresa.rygiel@freshfromflorida.com	X
Salfinger	Yvonne	APHL	yhale@aol.com	By phone
Schilling	Leo	Eurofins	LeoSchilling@eurofinsus.com	X - Advisor
Sheridan	Robert	NY Dept. of Ag	robert.sheridan@agriculture.ny.gov	X - Member
Shugart	John	GA Dept of Ag	John.shugart@agr.georgia.gov	X
Sikora	Frank	University of Kentucky	fsikora@uky.edu	X
Smith	Dawn	FDA	Dawn.smith@fda.hhs.gov	X
Snodgrass	Brenda	OK Dept. of Ag	Brenda.Snodgrass@ag.ok.gov	X - Member
Stadler	Tayler	Covance Food	Taylor.stadler@covance.com	X
Swarbrick	Michele	MN Dept. of Ag	Michele.swarbrick@state.mn.us	By phone - Member
Swoboda	Christy	Romer Labs	christy.swoboda@romerlabs.com	X
Szpylka	John	Merieux Nutri Sciences	john.szpylka@mxns.com	By phone - Advisor
Tang	Lei	FDA CVM	lei.tang@fda.hhs.gov	By phone - Member
Thiex	Nancy	Life Member	nancy.thiex@gmail.com	X - Member
Watkins	Victoria	KS Dept. of Ag	victoria.watkins@ks.gov	X
Webb	Sharon	UK Reg. Services	sharon.webb@uky.edu	X - Co-chair
Weigner	Timothy	FDA	Timothy.weigner@fda.hhs.gov	X
Weiss	Chris	IFPTI	chris.weiss@ifpti.org	X
Wu	Dancia	OISC	scharfd@purdue.edu	X
Wu	Xin	AOCS	xwu@aocs.org	X
Zimmerman	Greg	Waypoint Analytical	gzimmerman@wpacorp.com	X

Model Bills and Regulations Committee Report

2018 Annual Meeting
July 30, Fort Lauderdale, Florida

Committee Recommendations

1) The Model Bills and Regulations Committee recommends the following language be added to the Model Regulations for Pet Food and Specialty Pet Food Under the Model Bill as PF2(a)(8) and current PF2(a)(8) be changed to PF2(a)(9), and that the AAFCO Board of Directors review the proposed revisions for future consideration by the Association membership.

PF2(a)(8): A statement of calorie content if required under PF9; and …

Board Recommendations

Report accepted October 24, 2018
Board accepted recommendation 1

Association Actions: None

Committee Report and Minutes

Model Bills and Regulations Committee Chairman Doug Lueders called the meeting to order at 1:30 p.m. on July 30, 2018. 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), Erin Bubb (Pennsylvania), Bill Burkholder (FDA), George Ferguson (North Carolina), Robert Geiger (Indiana), Ben Jones (Texas), Richard Ten Eyck (Oregon), and Scott Ziehr (Colorado).

Industry advisers participating were: Meghan Dicks and Steve Younker (AFIA); David Dzanis (APPA/ACVN); Emily Helmes (ETA); Catherine Alinovi (Next Generation Pet Food Manufacturers Association), Jan Campbell and David Fairfield (NGFA); and Angele Thompson and Pat Tovey (PFI).

Minutes from Previous Committee Meetings

Chairman Lueders noted that minutes from the January 22, 2018 committee meeting conducted in Anaheim were previously approved, posted on the AAFCO website and Feed BIN, and were included in the 2018 Annual Meeting's General Session packet.

Old Business

1) Labeling of Mineral and Vitamin Units Work Group Report: Mr. Ziehr, chair of the work group established to evaluate uniformity associated with labeling of mineral and vitamin units, as well as label unit nomenclature used throughout the Model Bills and Regulations, provided recommendations as indicated in Attachment A.

Chairman Lueders accepted the work group's report and advised the committee the work group's recommendations would be further considered at 2019 AAFCO Midyear Meeting. He thanked members for their service and then disbanded the work group.

2) Statements for Uniform Interpretation and Policy (SUIP) Work Group Report: The SUIP Work Group was established by Chairman Lueders during the 2018 AAFCO Midyear Meeting to consider whether SUIPs should have a defined path to incorporation into the Model Bills or Regulations or eventually be deleted. Members of the work group are Padma Pillai (FDA), Liz Beckman (Feed Labeling Committee), Steve Younker (AFIA), Austin Therrell (Feed and Feed Ingredient Manufacturing Committee), Emily Helmes (ETA), Angele Thompson (PFI) and Cathy Alinovi (NGPFMA). Chairman Lueders reported that Cathy Alinovi graciously volunteered to chair the work group. Discussions are still on-going and it is anticipated the work group will present recommendations at the 2019 AAFCO Midyear Meeting.

New Business

The committee proceeded to consider new business.

1) SUIP Proposal for Generally Recognized as Safe (GRAS) Self-Conclusions

Chairman Lueders presented for discussion language that had come to the MBRC via the BOD's GRAS Policy work group. The presented language was not the official position of that work group but rather language that the work group felt needed additional vetting by the MBRC to see if it had traction to become an AAFCO position statement or SUIP.

The proposed SUIP language would apply to animal food ingredients subject to Generally Recognized as Safe (GRAS) self-conclusions:

Proposed SUIP: To ensure safety and efficacy of animal food ingredients, AAFCO members are encouraged to forward GRAS self-conclusions received for a new ingredient or an intended use not listed for an ingredient in the current OP to the AAFCO Ingredient Definitions Committee. The IDC will file a GRAS notice to FDA and ask FDA if they have any questions about the GRAS self-conclusion. The Notice to FDA and responses from FDA will be recorded in the IDC minutes.

In response to the proposal, Emily Helmes (ETA) delivered the statement indicated in Attachment B. In addition, comments made by other industry advisers pertaining to the proposed SUIP generally aligned with the views expressed by Ms. Helmes.

No action was taken by the committee on the proposed SUIP. Chairman Lueders stated that he would seek input from the AAFCO Board of Directors on the proposed SUIP before asking for further committee discussion.

2) PF2(a)(8) – Statement of calorie content if required under PF9

The committee considered the recommendation from the Pet Food Committee to add the following language as PF2(a)(8) within the Model Regulations for Pet Food and Specialty Pet Food Under the Model Bill and to change current PF2(a)(8) to PF2(a)(9):

Proposed PF2(a)(8): A statement of calorie content if required under PF9; and…

Ms. Bubb moved that proposed PF2(a)(8) be added to the Model Regulations for Pet Food and Specialty Pet Food Under the Model Bill and current PF2(a)(8) be changed to PF2(a)(9), and that the AAFCO Board of Directors review the proposed revisions for future consideration by the Association membership.

The motion was seconded by Mr. Bowers. The committee approved the motion by a voice vote.

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 2:30 pm.

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: Labeling of Mineral and Vitamin Units

Work Group Recommendations

1) Model Regulations Under the Model Bill, Regulation 4: Expression of Guarantees
   Add: (c) (8) 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.
2) Model Regulations Under the Model Bill, Regulation 4: Expression of Guarantees
   Revise (g) as follows:
   ~~(g) Guarantees for microorganisms shall be stated in colony forming units per gram (CFU/g) when directions are for using the product in grams, or in colony forming units per pound (CFU/lb.) when directions are for using the product in pounds. A parenthetical statement following the guarantee shall list each species in order of predominance.~~
   (g) Guarantees for microorganisms shall list each species in order of predominance, and shall be stated and conform to the following:
      (1) Colony forming units per gram (CFU/g) consistent with the directions for use; or
      (2) Colony forming units per pound (CFU/lb.) consistent with the directions for use; or
      (3) CFU per unit (e.g., tablets, capsules, granules or liquids) consistent with directions for use and the quantity statement or weight equivalent (e.g., 1 fl. oz. = 28 grams) for liquid products.
3) Model Regulations Under the Model Bill, Regulation 4: Expression of Guarantees
   Revise (h) as follows:
   ~~(h) Guarantees for enzymes shall be stated in units of enzymatic activity per unit weight or volume, consistent with label directions. The source organism for each type of enzymatic activity shall be specified, such as: Protease (*Bacillus subtilis*) 5.5 mg amino acids liberated/min./milligram. If two or more sources have the same type of activity, they shall be listed in order of predominance based on the amount of enzymatic activity provided.~~
   (h) Guarantees for enzymes shall be stated and conform to the following:
      (1) Units of enzymatic activity per unit weight or volume consistent with directions for use; or
      (2) Enzymatic activity per unit (e.g., tablets, capsules, granules, or liquids) consistent with the directions for use and the quantity statement or weight equivalent (e.g., 1 fl. oz. = 28 grams) for liquid products.
      (3) The source organism for each type of enzymatic activity shall be specified, such as: protease (*Bacillus subtilis*) 5.5 mg amino acids liberated/min./milligram. If two or more sources have the same type of activity, they shall be listed in order of predominance based on the amount of enzymatic activity provided.

Attachment B: Statement Delivered by Emily Helmes, Enzyme Technical Association, at July 30, 2018, AAFCO Model Bills and Regulations Committee Meeting in Response to SUIP Proposal on GRAS Self-conclusions

Proposed SUIP: To ensure safety and efficacy of animal food ingredients, AAFCO members are encouraged to forward GRAS self-conclusions received for a new ingredient or an intended use not listed for an ingredient in the current OP to the AAFCO Ingredient Definitions Committee. The IDC will file a GRAS notice to FDA and ask FDA if they have any questions about the GRAS self-conclusion. The Notice to FDA and responses from FDA will be recorded in the IDC minutes.

Statement: The Enzyme Technical Association (ETA) opposes this proposed SUIP (Statement of Uniform Interpretation and Policy) for the following reasons:

(1) ETA, AFIA, and other industry members are participating in the AAFCO GRAS Workgroup efforts to develop an AAFCO GRAS Verification Process (update report to be given at tomorrow's IDC meeting), and this SUIP would likely conflict with the recommendations from that WG.

(2) A GRAS notice cannot be submitted by the AAFCO IDC without a signed statement and certification from an AAFCO representative as required in accordance with the GRAS Notice Final Rule 21 CFR § 570.225. Unless the IDC self-concludes the GRAS status of the ingredient that is the subject of the self-conclusion, it will be unable to meet the signed statement and certification requirement; hence the submission from the IDC would be considered incomplete by FDA without this information and would not be evaluated. Therefore, because the proposal does not include plans for the IDC to self-conclude the ingredient submissions as GRAS, the proposal is not viable under the GRAS regulatory requirements.

As a result, we recommend that MBRC not vote on this new SUIP and that it await the WG recommendation to AAFCO IDC, expected by the midyear AAFCO meeting, January 2019.

Pet Food Committee Report

2018 Annual Meeting
July 31, 3:00–5:00 pm, Fort Lauderdale, Florida

Committee Recommendations

1) Pet Food Committee (PFC) moved to accept the revisions to PF4 and PF9 (see Appendix 3) and move to the Model Bill and Regulations Committee for their consideration.

Board Recommendations: Report accepted October 24, 2018

Association Actions: None

Committee Participants

Members Present: Kristen Green (Chair, KY), Stan Cook (Vice-Chair, MO), Lizette Beckman (WA), Bill Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM), James Embry (TX), George Ferguson (NC), Liz Higgins (NM), Tiffany Leschishin (MN – call in), Jo Lynn Otero (NM), Jason Schmidt (LA), Katie Simpson (IN), Austin Therrell (SC), Kristen Hamilton (ID – call-in); Sue Hays (AAFCO Executive Director), Caitlin Price (NC), Kathleen Close (FDA-ORA)
Advisors Present: Leah Wilkinson (AFIA), Robert King (AFIA), Dave Dzanis (APPA and ACVN), Angela Mills (NGFA), David Fairfield (NGFA), David Meeker (NRA), Angele Thompson (PFI), Pat Tovey (PFI), Bill Bookout (NASC), BC Henschen (AFTP), Cathy Alinovi (NGPFMA), Mollie Morrissette (PWA); James Emerson (US Poultry), Ken Gilmurray (NRA)

Committee Report

Committee Activities

Motion to disband the GAPFA workgroup. Moved by Charlotte Conway (FDA-CVM) and seconded by Liz Higgins (NM). Motion Passed.
Motion to accept the Large Size Dogs Feeding Protocol Workgroup report as displayed (see Appendix 1). Moved by Liz Higgins (NM) and seconded by Charlotte Conway (FDA-CVM). Motion passed. PFC intends to vote on this item before the midyear meeting.
Motion to accept the Human Grade Workgroup report as displayed (see Appendix 2). Moved by George Ferguson (NC) and seconded by Nathan Price (ID). Motion passed.
Motion to dissolve the exploratory Human Grade Pet Food Validation Workgroup. Moved by Charlotte Conway (FDA-CVM) and seconded by George Ferguson (NC). Motion Passed. Note that a new workgroup was formed.
Motion to accept the proposed revisions to PF4 and PF9 (see Appendix 3) and refer them to the Model Bill and Regulations Committee. Moved by Liz Higgins (NM) and seconded by Nathan Price (ID). Motion passed.

Committee Minutes

Meeting called to order at 3:00 pm EST

Announcements

PFC welcomed Caitlin Price from North Carolina as a new committee member. PFC also welcomed Ken Gilmurray as the alternate advisor for the National Renderer's Association. Suzanne Riddle (previously MO) has left the committee and will be pursuing other opportunities. Liz Higgins (NM) gave a tribute to Jan Jarman. Liz Higgins also announced her upcoming retirement, although she intends to stay involved with AAFCO.

Working Group Reports

AAFCO Website Review – Lizette Beckman (WA)
The workgroup has been meeting regularly to update the AAFCO Talks Pet Food website and will soon be moving on to The Business of Pet Food website. The calorie content and human grade updates have been drafted, although the workgroup would like to talk to the web designer at FASS regarding the pending website update to consider style elements. The workgroup would welcome a new member to replace Liz Higgins. Anyone interested should contact Lizette Beckman (WA)
GAPFA Maximum Vitamin A Workgroup – Charlotte Conway (FDA-CVM)
Work is completed. Workgroup disbanded.

Reviewing AAFCO Feeding Protocols Workgroup (to account for growth of large size dogs) – Kristen Green (KY), standing in for Dr. Bill Burkholder (FDA-CVM).
The workgroup met several times over the last few months to draft a proposal that was displayed on the screen. The workgroup felt that it might be too restrictive to always require the use of large size dogs in feeding protocols to substantiate suitability for growth of large size dogs. As an alternative option, a more typical small to medium colony dog could be used for feeding trials with the added constraint of limiting calcium and phosphorous in the formula to the most restrictive maximum values in the AAFCO Dog Food Nutrient Profiles (max 1.8% Ca and 1.6% P on a dry matter basis). Language is being proposed for addition to PF7(a)(2) and PF7(b)(3) and can be found in Appendix 1. Language will also need to be added to the protocols to refer back to the new PF7 requirements. This language will be provided to the committee prior to a vote. The workgroup report was accepted and uploaded to the Feed Bin for broader circulation prior to a full committee vote.
PF(3)e – James Embry (TX)
No report as the workgroup has not yet met.
Human Grade – George Ferguson (NC)
The workgroups comments and suggestions were posted publically in the Feed Bin this spring. This workgroup included representatives from USDA-FSIS and USDA-AMS as well as committee members and advisors. The Workgroup has completed its charge and will not be amending the AAFCO human grade guidelines or definition at this time. The Workgroup provided 5 recommendations as well as additional comments to the PFC, see Appendix 2. A copy of the workgroup report will be provided to Ali Kashani, AAFCO Feed Terms investigator. The recommendations include establishing a new workgroup to implement the recommendations. The Chair of PFC will be determining the makeup of the new Human Grade workgroup and electing a Member to chair this committee. Anyone interested in serving on this new workgroup should contact Kristen Green with your qualifications.
Discussion Items
PF4 Guaranteed Analysis Header and PF9 and ME requirements – Liz Higgins (NM)
Liz Higgins provided proposed revised language to PF4 and PF9 as found in Appendix 3. The proposed revision for PF4 specifies that the heading “Guaranteed Analysis” be required with that specific language. The proposed revision for PF9 was to specify that the words ”Metabolizable energy” or abbreviation “ME” must appear as part of the calorie content statement. Both recommendations were accepted by the committee for referral to MBRC.
Discussion of a suggested implementation period for rabbit labeling – Kristen Green (KY)
PFC was asked whether a suggested implementation period for the change in pet rabbit labeling would be appropriate. It was discussed that because most state laws don’t change as quickly as the AAFCO Model Regulations, States often utilize discretion. The PFC would like to encourage states to consider using their discretion when considering the labeling changes required for pet rabbit labeling. No other committee action to be taken.
Discussion of ‘95% claims’ vs. ‘95% Product name rule’ – James Embry (TX)
States have been seeing an increasing trend to include specific meat/ingredient percentage claims on labeling. For example, the front of a package may claim ‘95% chicken’, but a check of the formula indicates that that percentage is exclusive of water content, similar to the exemption allowed in PF3(b)(1). Some states consider this claim to be misleading since the claim is not truthful or qualified. In addition, there is also precedent in PF3(a) allowing for the exclusion of water in 100% claims. A workgroup will be formed, to be chaired by James Embry (TX) to explore this issue. Anyone interested in serving on this new workgroup should contact James Embry.
Discussion of non-GMO in meat/animal products
This item was not discussed due to time restriction. The PFC committee will consider whether to include it on the January 2019 agenda at a later date.
Pet Food Label Modernization Discussion – Sue Hays
Sue Hays is the new project manager for the Label Modernization Workgroup. The label modernization remains a major focus for PFC. The ongoing goal for the workgroup is to reach consensus in the four subgroups for their work products. Sample labels continue to be developed that contain elements from the subgroups that have been working. The four subgroups are Nutrition Facts Box (Jason Schmidt, Chair), Ingredient List (Richard Ten Eyck, Chair), Nutritional Adequacy Statement (Jo Lynn Otero, Chair) and Safety Statement (Lizette Beckman, Chair). Each subgroup chair reviewed their group’s progress and explained the elements on the mock up labels as well as discussing areas of on-going work and any

specific questions that the subgroups have. The presentation can be found in the Feed Bin. The floor was opened for comments.
Some of the general comments or concerns regarding the safe handling group included: how to include all required information on smaller packages and packages with multiple languages, following ready to eat approach for human foods for safe handling instructions as well as Guidance for Industry #122, and cautionary statements on raw foods compared to kibbled foods. Comments were raised regarding the possibility of confusing pet and human products since the formatting of the labels is being aligned. There was considerable discussion of the nutritional adequacy graphic or 'bug' on the front of the label and what it should say as well as the necessity of it appearing on treats/supplement. A comment was made regarding the economic burden or reworking labels to comply with the ultimate outcome of this project. It would certainly be PFC's intention to suggest discretion and implementation periods to reduce this burden.
The subgroups are to the point that they need validation of their work and want structured consumer input. Sue Hays presented bids from two independent firms that have submitted proposals for a qualitative approach to do the consumer market research. The PFC will be meeting prior to the January meeting to choose a provider with the hope to have a report back to the PFC.
Pet Food Committee Adjourned at 5:00 pm EST.

Appendix 1

Revising requirements to the Feeding Protocols to account for the special nutritional requirements for growth of large size dogs. DRAFT language.

I. Regulation PF7. Nutritional Adequacy

(a) The label of a pet food or specialty pet food which is intended for all life stages and sizes of the pet or specialty pet may include an unqualified claim, directly or indirectly, such as "complete and balanced," "perfect," "scientific," or "100% nutritious" if at least one of the following apply:

(1) The product meets the nutrient requirements for all life stages and sizes established by an AAFCO-recognized nutrient profile; or

(2) The product meets the criteria for all life stages as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol(s);

A. Unqualified claims of nutritional adequacy that include large size dogs can be substantiated by: completing the appropriate protocols with large size dogs or

B. Can be substantiated by completion of appropriate protocols with dogs less than 70 lbs adult weight while complying with the calcium and phosphorus maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles; or

(3) The product is a member of a product family which is nutritionally similar to a lead product which contains a combination of ingredients that has been fed to a normal animal as the sole source of nourishment in accordance with the testing procedures established by AAFCO for all life stages, provided that:

A. The nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and

B. The family product meets the criteria for all life stages; and

C. Under circumstances of reasonable doubt, the (State Control Official) may require the manufacturer to perform additional testing of the family product in order to substantiate the claim of nutritional adequacy.

(b) The label of a pet food or specialty pet food which is intended for a limited purpose (such as size of dog) or a specific life stage, but not for all life stages and sizes, may include a qualified claim such as "complete and balanced," "perfect," "scientific," or "100% nutritious" when the product and claim meet all of the following:

(1) The claim is qualified with a statement of the limited purpose or specific life stage for which the product is intended or suitable, for example, "complete and balanced for puppies (or kittens)." The claim and the required qualification shall be juxtaposed on the same label panel and in the same size, style and color print; and

(2) The product meets at least one of the following:

A. The nutrient requirements for the limited purpose or specific life stage established by an AAFCO-recognized nutrient profile; or

(3) The criteria for a limited purpose or a specific life stage as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol(s);

A. Qualified claims of nutritional adequacy that include large size dogs can be substantiated by: completing the appropriate protocols with large size dogs or

B. Can be substantiated by completion of appropriate protocols with dogs less than 70 lbs adult weight while complying with the calcium and phosphorus maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles;

A. or

B. The requirements of a product family which is nutritionally similar to a lead product which contains a combination of ingredients which, when fed for such limited purpose, will satisfy the nutrient requirements for such limited purpose and has had its capabilities in this regard demonstrated by adequate testing, and provided that:

i. The nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and

ii. The family product meets the criteria for such limited purpose; and

iii. Under circumstances of reasonable doubt, the (State Control Official) may require the manufacturer to perform additional testing for the family product to substantiate the claim of nutritional adequacy.

(c) Dog and cat food labels shall include a statement of nutritional adequacy or purpose of the product except when the dog or cat food is clearly and…

Appendix 2

While Utilizing AAFCO's Terms, Definitions and Guidance for Human Grade Pet Food Claims; Identify options whereby FDA and USDA may partner together for the purpose of validating Human Grade Pet Food Claims, in products that span both agencies jurisdiction.

Regarding opportunities for validation of voluntary "human grade pet food" claims on products that are manufactured, processed, blended and/or packaged under rules and in facilities that span multiple regulatory agency jurisdictions (e.g., USDA-FSIS, EPA, FDA), the Human Grade Pet Food Validation Workgroup makes the following recommendations;

1. That AAFCO, under the direction of the AAFCO Pet Food Committee, establish a partnership with USDA's Agriculture Marketing Service (AMS) for the purpose of validating a firm's ability to make "human grade pet food" claims.
2. That AAFCO and AMS utilize AMS's Process Verified Program (PVP) as the mechanism by which claim validation is verified.
3. That AAFCO's Pet Food Committee establish a "Human Grade Pet Food Standards" working group to:
    a. Develop PVP Standards for the "Human Grade Pet Food" claims, utilizing AAFCO's current Terms, Definitions and Guidance for "Human Grade Pet Food" claims as their starting point.
    b. Modify, only as needed for the inclusiveness of non-traditional FDA jurisdiction human food products such as meats, the current AAFCO Terms, Definitions and Guidance for Human Grade Pet Food Claims.
4. That upon completion of development and delivery of all requirements, the working group will prepare and submit to the AAFCO Pet Food Committee a written document, similar to a preamble in format and purpose, that explains the thinking, intent and expectations of the Definition, Guidance, Standards and Partnership.
5. Give significant consideration to the comments, thoughts and guidance as offered to the Committee's working group, by the Human Grade Pet Food Validation Workgroup.

Comments, Thoughts and Guidance

Ensure that the Standards working group includes AAFCO members and advisors as well as representatives from impacted Federal agencies (e.g., FDA, USDA, AMS, FSIS).

1. Obtain a commitment from all working group members are willing to participate by providing original ideas and thought.
2. Those who seek only to scrutinize the work of others without also providing alternatives and/or original solutions, should be removed from the working group. There will be ample opportunity for individuals to comment on the working groups submissions during committee review as well as member vote.
3. Prior to the working group addressing the concerns of their charge, members should attend an in detail PVP workshop, delivered by AMS, in order to fully understand how the PVP works, is delivered, is audited and what it includes above and beyond the standards that they will develop. This initial step will help to ensure that unnecessary duplication is created as well as help to narrow the focus of the group to just those issues needed to be addressed by the Standard.
4. Consider AMS recommendations when determining the best way to document/allow/formalize the partnership.
5. 3rd party inspection audits/reports/findings, i.e. those from either non-regulatory agencies or agencies without jurisdictional enforcement authority, shall not be allowable as evidence/documentation of required regulatory compliance/inspections. It shall be the manufacturing firm's responsibility to ensure it is able to manufacture and be inspected by the authorized agency to conduct such inspections, in a human food facility. Human Grade Pet Food claims are voluntary, and as such, no feed control official, neither state nor federal, can mandate that a human food authority license a facility that is only manufacturing a pet food product.

The comments below are to address the blending and/or packaging of products in a non-USDA facility, that contain meat. These comments may also prove beneficial when addressing other products requiring a kill-step, such as milk.

6. Allow "human grade pet food" claims on products that are/contain ingredients that typically fall under regulatory jurisdictions other than FDA, to be blended, packaged, repackaged and/or labeled in;
    a. A registered FDA Human Food subject to CFR 21 Part 117 as long as,
        i. Those included ingredients that traditionally fall under the regulatory authority of an agency other than FDA, were processed, packed, held and shipped under a human food

processing code in a manner applicable to their federal regulations up to and through the kill step (if applicable) and in a facility that is registered/authorized by the applicable regulatory authority.

b. A registered/authorized USDA, or other federally allowable human food facility as determined by federal law;
    i. That is subject to enforcement action under federal law and,
    ii. That produces human food requiring no further kill step.

7. In order to avoid future conflict as new pathways for human grade pet food products and ingredients are being developed, when possible, we suggest that you avoid the use of agency specific language as well as specific CFR and Part numbers, and instead consider phrases such as;
    a. "all finished products and its included ingredients must be manufactured, inspected and in compliance with its applicable human food law."
    b. "inspected by the agency authorized to conduct such enforcement inspections at your facility type."

The following is a list of questions submitted by individuals within the Human Grade Validation Workgroup. The answers provided represent the thoughts of a single state agency, and are in no way meant to be inclusive nor representative of all of AAFCO. They are merely provided as a prompt and intended to elicit further discussion as well as the sharing of ideas.

*It was mentioned that a PVP audit/verification (audit option allowing a seal on packaging) requires constant USDA inspection. What about a company that processes meats at a USDA facility, those meats leave the facility in a ready-to-eat state, enter a separate human food only facility that doesn't cook meat (but does process other human foods), and the meat is mixed and packaged in that second facility?

The audit would verify that the meat came from a USDA human food facility, was under constant USDA inspection through the kill/cooking step and was then moved under a USDA human food code. As for the final steps of packaging and/or blending at a Human food facility under FDA jurisdiction, the audit would verify that the facility was registered, had received a compliant inspection and then whatever additional requirements the Human Grade Guidance workgroup saw fit to include. Please keep in mind that our group is not the Guidance group. That group will likely be formed in August.

*Will manufacturer *and* packager have to be audited?

The audit will have to verify that the meat being used in the "FDA" facility came from a USDA facility and was processed and inspected through the kill step under a human food code.

*The biggest concern last week seemed to surround PVP audits being more marketing claims based and less food safety based. Mr. Ferguson mentioned that both a thorough claims/marketing audit *and* a quality audit would be required. Will all companies be required to meet the exact same quality standards?

All firms will be required to meet both the "Human Grade Pet Food Marketing Claim" as well as their applicable CFR's. The one area of exception will be where we must work around the 3% meat rule requiring USDA constant inspection. We will address this issue as a group and I believe that we can show the product meets the Human Grade standard as FDA is responsible for non-amenable meats as well as several areas of meat such as sandwiches, thus there are standards and cGMP's in place in the 117's to help ensure safe practices are utilized.

*An AAFCO committee would create the industry standards for audits. What sort of base standards can be expected (very basic ideas)?

The AMS PVP Quality Management System (QMS) is the base requirement for everyone, from there the committee would add steps to meet the "Human Grade Pet Food Definition, such as every product meet its applicable CFR rules up to and through their kill step (if applicable) and that it be processed in a Human Grade Facility that is registered with FDA, (or under USDA) inspected and compliant with FDA/USDA and then basic Pet Food labeling.

*How will potential new AMS claims work with the current, allowable AAFCO claims?

The current allowable AAFCO claim will be modified to include this new ingredient area (meat) that was and will remain under another agencies jurisdiction.

*Will AMS re-inspect if a new ingredient is brought in (ex: rabbit) like APHIS export audit?

That is a good question for AMS. We will get with them to work through scenarios once we have a better understanding of what our standard will be.

*PVP audited companies are required to develop a Quality Manual and AMS verifies the company's adherence to those processes through routine audits. For "distributor" companies that strictly use a co-

packer, would the "distributor" need a separate QC manual from the co-packer? Would each co-packer need to submit a QC manual?

Distribution channels would have to show compliance with human food standards already in place, applicable to their product. Each co-packer would be required to develop a QC manual and be subject to audit/verification.

*Would PVP audited companies' labels require additional approval before marketing (realizing AMS does not review labels)?

Registration and labeling/label approval would be up to each state just as it is today. This means you would follow the same path. What the PVP allows for, is that when you submit a product with a HG claim and the PVP seal, the state will be able to go to the AMS website, look up your firm and product and see that yes, it is allowed to make the claim. This means that you will not have to submit any additional paperwork to the state to verify and validate your ability to make the claim. Please understand that no state is required to follow the process that AAFCO develops, yet it is rare that one does not.

*If we move forward with AMS, what would be the AAFCO-based compliance period for companies? Would we give current HG companies six months for compliance? One year?

We would look to industry as well as AMS for guidance on an acceptable transition.

Appendix 3

Proposed Revision to PF4 – Expression of Guarantees

There has been some confusion about use of a heading in the Guaranteed Analysis. While most labels do use the words "Guaranteed Analysis" as the heading, some companies have expressed that the regulations do not clearly state the requirement for the heading. In order to clarify the need for the use of the heading, the following change to PF4(a) is being proposed:

Regulation PF4. Expression of Guarantees

(a) The "Guaranteed Analysis" shall be listed **under the heading "Guaranteed Analysis"** in the following order and format unless otherwise specified in these Regulations:

(1) A pet food or specialty pet food label shall list the following required guarantees;

A. Minimum percentage of crude protein;
B. Minimum percentage of crude fat;
C. Maximum percentage of crude fat, if required by Regulation PF10;
D. Maximum percentage of crude fiber;
E. Maximum percentage of moisture; and
F. Additional guarantees shall follow moisture.

Proposed Revision to PF9 – Statements of Calorie Content

There has been some confusion on the part of both regulators and industry about the requirement of "…in terms of metabolizable energy (ME)…" to be included in the calorie content statement. The energy of a food can be expressed in several ways: gross energy, digestible energy and metabolizable energy. The Model Pet Food & Specialty Pet Food Regulations state in PF9(a)(2) that the calorie content statement on pet food labels must be in terms of metabolizable energy. However, the wording in the regulation is not a clear enough communication of the requirement. The proposed language change is intended to clarify the regulation and lessen the confusion on the part of both the regulator and the regulated industry.

Regulation PF9. Statements of Calorie Content

(a) The label of a dog or cat food, including snacks, treats, and supplements, shall bear a statement of calorie content and meet all of the following:

(1) The statement shall be separate and distinct from the "Guaranteed Analysis" and appear under the heading "Calorie Content";

(2) The statement shall be measured in terms of metabolizable energy (ME) on an "as fed" basis and must be expressed**, including either the words 'metabolizable energy' or the abbreviation 'ME,'** both as "kilocalories per kilogram" ("kcal/kg") of product, and as kilocalories per familiar household measure (e.g., cans or cups) or unit of product (e.g., treats or pieces); and

(3) The calorie content is determined by one of the following methods:

Proficiency Testing Program Committee Report

2018 Annual Meeting
July 30, 1:30–5:30 pm, Fort Lauderdale, Florida

Committee Recommendations

1) Change Mycotoxin Contaminants Scheme calculation for fit-for-purpose (ffp) sigma (σ) from the Thompson Modified Horwitz sigma to the AAFCO Mycotoxin Contaminants sigma, as noted in the Mycotoxin FFP Sigma Review presentation
2) Revise the 2019 AAFCO Official Publication (OP) Explanation (origin, purpose & use) of analytical variations.
3) Correct the Analytical Variance Tables in the AAFCO OP to remove errors in the table that have been introduced since 2012.
4) Work with AAFCO Model Bill/Labels Committee (and other committees identified by the Board) for eventual deletion of the AAFCO Analytical Variance Tables from the OP.
5) Write white paper on Analytical Variations Table to inform the Board of Directors and general membership of the need to remove analytical variations from the OP. (AAFCO PT Program AV White Paper)
6) Remove Analytical Variation Tables at a future date, contingent on the release if the AAFCO PT Program AV White Paper, and subject to Board approval and a majority vote of the AAFCO General Membership.

Board Recommendations: Report accepted October 24, 2018

Association Actions: None

Committee Participants

Members Present

First	Last	Affiliation	Email	Role
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
Andy	Crawford	AAFCO PTP	andy@crawford.org	Statistician
Bob	Kieffer	AAFCO PTP	bob@ablelaboratory.com	Manager
Amy	Kieffer	AAFCO PTP	amy@ablelaboratory.com	Manager
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George	Ferguson	NC Dept. of Ag	—	Board Liaison, new
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John	Szpylka	Merieux NutriSciences	John.szpylka@mxns.com	Advisor
Pat	Tovey	Pet Food Institute (Alternate Rep)	pat@petfoodinstitute.org	Advisor (alternate)
Susan	Wiegert	Phibro Animal Health Corporation & AFIA Alternate	susan.wiegert@pahc.com	Advisor

Committee Report

1) Call to Order
2) Review and Approval of Agenda
   a) Approved with modifications
3) Introductions and Sign-up Sheet
4) Program Leadership and Administrative Update
   a) Financial update
      i) Financial Reports provided by FASS Executive Assistant, Jennifer Roland
      The FY 2018 Program Year financials were presented by B. Snodgrass. Attendees commented that the net operating expense was lower than in FY 2017, and lower than budgeted.
         (a) This is the first year that the PT Program had no funding from the 5-year FDA Cooperative Agreement, thus all expenses were paid directly from Program income.
         (b) Increased expenses were noted in the payment of shipping costs versus budgeted shipping costs, and for FY 2018 when compared to FY 2017. This was an anticipated increase and participants pay shipping with their paid subscriptions. The shipping expense not accounted for in the budget increased for replacement of lost & damaged items mailed domestically without a billable courier account increased.
         (c) The total Program costs were ~20% above the budget, but when shipping costs are excluded Program costs were ~10% above budget.
   b) Accreditation update
      i) Two-year cycle coming up in January, 2019. Preparing for 2 year audit and then program will be in the two year cycle.
   c) Continuity of Operations
      i) Program manager noted this plan is pending and needs to remain on the agenda for contingency of the program operations in case of personnel changes or extended absences from duties. Also, the Program is in a better position than it was three (3) years ago (FY2015) because policies and procedures have been documented for ISO 17043 accreditation.
5) Program Updates
   a) **Program Participation Reports** – Presentation: *PT Program 2017-18 Participation*
      i) Animal Feed Scheme – around 200 active participants, homogeneity screen – all with-in the Z-cut.
      ii) Pet Food Scheme – between 50 to 60 participants reporting, homogeneity screen – all with-in the Z-cut.
      iii) Minerals Scheme – Over 30 participants reporting
      iv) Mycotoxin Scheme – 40 to 50 participants
   b) **Stability testing** – Need to interpret Nancy's notes and Patty's
      Presentation: Stability by Duplicate Samples
      i) One feed was analyzed in a 4 month interval and one feed analyzed back to back. The 4 to 6 week window was the best for stability especially for analytes such as Vitamin A.
      ii) 201724 / 201728- 22 of 58 analytes flagged as unstable. For 12 of the 22 analytes, the difference was not detectable by Student's T-Test.
      iii) 201822 / 201823 (Feb. & March of this year) - 5 of 54 analytes flagged as unstable. For 4 of the 5, the difference was not detectable by Student's T-Test. Other 49 of 54 analytes are stable.
      iv) Conclusion: We are sufficiently stable for PT. Labs are advised to refrigerate samples in sealed containers (or dry jar) upon receipt.
6) Improvements
   a) **Website homepage**: A new banner "Contact Us" was added with the PT Program email.

b) Data Reporting Website & Data Reporting Website Manual:
   i) Labs can now report Less Than (<) LOQ for all schemes. The Save button has been eliminated.
   ii) The Submit button performs the same function. Labs can change values up to the reporting deadline.
   iii) On the Lab Admin Tab: Shipping address and recipient can be modified but to add a new lab contact, the lab must go to the FASS Dashboard. A link has been added.
   iv) The DRW Manual has been updated.

c) **Participant Guidebook**: The guidebook has been updated. Many questions received by participants indicate that the guidebook is not being read. We send them the link and let them know the information is available in the manual.

7) Scheme Reports

a) **Animal Feed – Veterinary Drugs** – PRESENTATION: *AAFCO PT Drug*
Lab Methods and Services Committee (K. McCallum and S. Webb) did a survey on 2017 on drugs analyzed by labs. In the survey, 41 drugs were checked by respondents, 23 labs indicated that they run or are interested in adding certain drugs. As a follow up we reviewed what is actually reported to PTP.
It has become increasingly difficult to obtain drugs in animal feeds. Our suggestion is to focus on the top 7 to 8 drugs.
Pesticides: Of the attendees at the meeting, only 4 private labs and CFIA routinely run pesticides in feed. States only run for complaints.

b) **Pet Food** – PRESENTATION: *AAFCO Pet Food PT Survey*
Review of Pet Food Survey from March 2018 and group discussion of comments submitted.

c) **Mycotoxin** – PRESENTATION: Mycotoxin Fit for Purpose Review
As of July 1, 2018 the scheme uses the modified (Thompson) Horwitz Sigma rather than a consensus robust standard deviation.
A PT study mycotoxin report from BIPEA was compared to the original Horwitz Sigma and the modified Horwitz Sigma. All were slightly different, and none fit the AAFCO data well.
All animal feed data from the AAFCO PT Program over a 5 year period (6800 points) were plotted and only 6% of the data points exceeded 20% relative standard deviation. This shows that the Modified (Thompson) Horwitz equation works very well for the lower concentrations.
A log-log data plot of mycotoxin concentration vs. relative standard deviation is fairly linear so an equation similar to the Thompson modified Horwitz equation can be calculated. This equation is proposed for a new fit-for-purpose (ffp) sigma for the AAFCO Mycotoxin Contaminant scheme. The resulting % of compliant, warning and action levels for existing rounds closely aligns with traditional statistical dispersion about a normal data distribution.
Motion to accept change to the AAFCO Mycotoxin Contaminants Modified (Crawford) ffp sigma by A. Price: Seconded by S. Webb/M. Koestner. Motion carried unanimously. Statistical evaluation will continue to review the appropriate statistical metrics and report any problems or changes back to program managers. This information will be reported back to committee members & advisors as appropriate.

d) **Minerals** – A survey will be sent to participants in Winter (2018)/Spring (2019)

8) Official Publication Analytical Variances Roundtable

a) Errors were found in the Table of Analytical Variation. These errors were made when the AAFCO Official Publication (OP) in ~ 2012 and are incorrect in every online version of the OP. These have been corrected and submitted for the 2019 OP (print & online).

b) Brenda presented proposed language for 2019. Discussion & consensus to move forward. This change must go to the AAFCO Board of Directors for consideration, and eventual vote by AAFCO general membership. The AVs have long been used by the regulatory program officials, including those written into some states' laws, and by industry to estimate allowable variations on labels during manufacturing process.

c) Motion to accept OP revisions by S. Webb, seconded by T. Ha. Motion carried unanimously.

d) Working group to write white paper, propose replacement for AVs. M. Koestner, K. Riter, A. Huyghues-Despointes, L. Reimann, B. Snodgrass, L. Ogden, N. Thiex, and others TBD.

9) Adjournment

Action Item Table

Responsible Party	Item	Action	Timing / Status
PT Program Managers	Change to the Mycotoxin Contaminants scheme fit-for-purpose sigma	Notify PT participants about change via the 201863 Report Authorization Letter/ Revise PT Program Statistical Analysis SOP	August 2018/ October 2018
B. Snodgrass	Analytical Variation Explanation and Tables	Revise Analytical Variation Explanation and correct formatting and typographical errors to the Tables	October 2019
L. Ogden & B. Snodgrass	Gather customer feedback for Minerals Program participants	Write & send customer survey to all Minerals Scheme PT Participants	Between November 2018 and May 2019
B. Snodgrass & AV Work Group	AAFCO PT Program AV White Paper	Work with PT Program Work Group Volunteers and related AAFCO committees to draft & finalize a white paper on Analytical Variances of the OP.	January 2019

Meeting Attendees

First	Last	Affiliation	Email
Shaun	Anderson	Alltech, Ridley USA	shaun.anderson@ridleyinc.com
Josh	Arbaugh	WV Dept. of Ag	jarbaugh@wvda.us
James	Barbara	Nutrien	barbara.james@nutrien.com
Ametra	Berry	GA Dept of Ag	ametra.berry@agr.georgia.gov
Scott	Bloomer	AOCS	scott.bloomer@aocs.org
Brittany	Blunt	South Carolina Dept. of Ag	bblunt@scda.sc.gov
Vickie	Boykin	South Carolina Dept. of Ag	vboykin@scda.sc.gov
Ellen	Buchanan	FDA	ellen.buchanan@fda.hhs.gov
Jane	Caldwell	Midwest Labs	jcaldwell@midwestlabs.com
Andy	Crawford	AAFCO PTP	andy@crawford.org
Deepika	Curole	LSU Dept. of Ag. Chem.	dcurole@ldaf.state.la.us
Manisha	Das	FDA/CVM (Alternate Rep)	Manisha.Das@fda.hhs.gov
Hemakanthi	De Alwis	FDA/CVM	hemakanthi.dealwis@fda.hhs.gov
Krystal	Gage	Cargill Inc.	krystal-gage@cargill.com
Tom	Garavaglia	Mich Dept of Ag	garavagliat@michigan.gov
Teresa	Grant	NC Dept. of Ag & APHL Liaison	teresa.grant@ncagr.gov
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Robin	Johnson	Montana Dept of Ag	robinjohnson@mt.gov
Soloman	Kariuki	UK Div. of Reg. Serv.	skariuki@uky.edu
Maryam	Khosravifard	CDFA-CAC Feed Lab	maryam.khosravifard@cdfa.ca.gov
Bob	Kieffer	AAFCO PTP	kiefferbob@gmail.com
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Joyce	Lewis	LA Dept of Ag & Forestry	jlewis@ldaf.state.la.us
Patty	Lucas	FL Dept. of Ag. & Cons. Serv.	patricia.lucas@freshfromflorida.com
Das	Manisha	FDA/CVM (Alternate Rep)	Manisha.Das@fda.hhs.gov
Quintin	Muenks	MO Dept. of Ag	quintin.muenks@mda.mo.gov
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Melissa	Nichols	MO Dept. of Ag	melissa.nichols@mda.mo.gov
David	Nobo	KS Dept. of Ag	david.nobo@ks.gov
Louise	Ogden	AAFCO PTP	pt@aafco.org

First	Last	Affiliation	Email
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Aaron	Price	CFIA	aaron.price@canada.ca
Lars	Reimann	Eurofins & AFIA Primary	larsreimann@eurofinsus.com
Ken L.	Riter	Nestle Purina Analytical Labs & Pet Food Institute	ken.riter@purina.nestle.com
Lisa	Ruiz	Eurofins	LisaRuiz@eurofinsUS.com
Teresa	Rygiel	Fl. Dept of Ag	Teresa.Rygiel@freshfromflorida.com
Yvonne	Salfinger	APHL	yhale@aol.com
Robert	Sheridan	NY Dept of Ag	robert.sheridan@agriculture.ny.gov
John	Shugart	Georgia Dept. of Ag	john.shugart.agri.georgia.gov
Frank	Sikora, Ph.D.	AAPFCO (Magruder)	fsikora@uky.edu
Dawn	Smith	FDA	dawn.smith@fda.hhs.gov
Brenda	Snodgrass	AAFCO PTP/OK Dept of Ag	pt@aafco.org
Taylor	Stadler	Convance Food Solution	taylor.stadler@covance.com
Michele	Swarbrick	MN Dept of Agriculture	michele.swarbrick@state.mn.us
Christy	Swoboda	Romer Labs	Christy.Swoboda@romerlabs.com
Nancy	Thiex	AAFCO PTP	nancy.thiex@gmail.com
Victoria	Watkins	KS Dept. of Ag	victoria.watkins@ks.gov
Sharon	Webb, Ph.D.	UK Div. of Reg. Serv.	sharon.webb@uky.edu
Dancia	Wu	OISC	scharfd@purdue.edu
Xin	Wu	AOCS	xwu@aocs.org
Greg	Zimmerman	Waypoint Analytical	gzimmerman@wpacorp.com

Presentations

- Stability By Duplicate Samples
- AAFCO PT Drug
- AAFCO Pet Food PT Survey
- Mycotoxin Fit for Purpose Review
- PT Program 2017-18 Participation

Strategic Affairs Committee Report

2018 Annual Meeting
August 1, 10:15 am–12:00 pm, Fort Lauderdale, Florida

Committee Recommendations

- Report acceptance.
- Recommend *editorial* revision, inserting a sentence in the OP page 20, Committee Advisors Section. (This sentence also appears in the OP page 92, Committee Operating Procedures). SAC advises that membership vote is not needed. Addition is in bold:

  Committee Advisors

  It is the general practice of AAFCO to invite representatives of industry/trade associations and consumer groups to serve as advisors to the various AAFCO committees, task forces or work groups during their open meetings. AAFCO invites these groups to nominate individuals to serve as committee advisors to be available to answer questions relevant to animal nutrition, analytical expertise, industry practices or other pertinent questions. Committee advisors do not serve as members of an AAFCO committee, task force or work group, nor do they have a vote in any AAFCO deliberations. **Any advisor who behaves in a manner disruptive to committee business may be subject to removal as an advisor to the committee by the AAFCO President.** The following committee advisors are currently available as a resource to the specified committee(s) or task force(s):

Board Recommendations: Report accepted October 24, 2018

Association Actions: None

Committee Participants

Full Committee Members: Linda Morrison, Ali Kashani (Board Liaison), Nancy Thiex, Andy Gray, **Erin Bubb, Jamey Johnson, Doug Lueders,** Shannon Jordre, **Ken Bowers, Chad Linton (BIN Coach), Mark LeBlanc,** Dragan Momcilovic, **Jenny Murphy, Aaron Price**, Kent Kitade, Richard Ten Eyck (BIN Coach), Robert Waltz, Vice Chairperson**
***Stan Cook**
***Dan Danielson**
By-Laws Sub-Committee: Ken Bowers, Erin Bubb, Doug Lueders, Richard Ten Eyck
Committee Advisors: Dave Fairfield, Dave Dzanis, Bob Ehart, **Richard Sellers**, Nancy K. Cook,** Kristi Krafka, Ed Rod, ~~Diane Loiselle~~ replace?
Bold denotes those participating in the meeting
*New
**Brenda Snodgrass will replace Aaron Price and Leah Wilkinson will replace Richard Sellers in 2019.

Committee Report

1. Sub-Committee: By-Laws Update(Ken)
   - Ingredient tentative status update (Richard):
     - WG in IDC are rewriting guidelines for new definition or modification and will take survey results into consideration and expect to have update this fall.
     - Recommendations, if formal, will be submitted for By-Laws consideration.
   - AAFCO name review: update from Working Group (Richard/Susan)
     Board Charge: Investigate and make recommendations regarding changing AAFCO's name to accommodate members who may not be from "America". Include consideration of changing American to Animal and Feed to Food. Analysis of feed versus food should include implications for federal and state legislative terminology, international familiarity and use (e.g. proficiency testing program) as well as cost. If a name change recommendation has merit, guidance should also be given regarding process to implement. Acronym should remain the same.
     - Report is in Appendix 1
     - Animal vs American: encourages more international engagement and members; international outreach important but name isn't holding back participation. Participants

are coming because of interest in American regulation. Intended to encourage adoption and use of the information AAFCO has (notably for developing countries). They can join/share with current name and isn't currently an obstacle.
    - Feed vs Food: Feed better differentiates from food type issues. FDA "food" includes food for animals. "Animal food" was chosen to better identify and separate feed and pet food from human food. Feed is the traditional and is better recognized descriptor.
    - Could add "international" and leave the current name.

  Motion: To accept the report from the WG - Richard; second Erin; motion passes

  Motion: To change American to Animal - Richard; second Jenny; yes - 4, no - 7; motion fails - AAFCO name stays the same.

  Motion to disband the working group: - Richard; Second - Erin; Motion carries.
- Committee member and advisor language from By-Laws to Procedures (Ken):
    - Looked at AFDO by-laws and couldn't find much of anything regarding code of conduct.
    - Also looked at AFIA's conduct policy, which was pretty short, and it didn't really translate to AAFCO.
    - Decided that the edit discussed at Mid-Year in the Strategic Affairs meeting was enough for now.

  Recommendation for insertion on OP page 20, Committee Advisors Section is in bold:

  Committee Advisors

  It is the general practice of AAFCO to invite representatives of industry/trade associations and consumer groups to serve as advisors to the various AAFCO committees, task forces or work groups during their open meetings. AAFCO invites these groups to nominate individuals to serve as committee advisors to be available to answer questions relevant to animal nutrition, analytical expertise, industry practices or other pertinent questions. Committee advisors do not serve as members of an AAFCO committee, task force or work group, nor do they have a vote in any AAFCO deliberations. **Any advisor who behaves in a manner disruptive to committee business may be subject to removal as an advisor to the committee by the AAFCO President.** The following committee advisors are currently available as a resource to the specified committee(s) or task force(s):

  Motion: To accept the advisor language change and insert on page 20 - Jenny; Second - Ali; Motion carries.
    - Just an edit since this sentence is also in the Committee Meeting Operating Procedures no requiring membership vote/approval.

  Action: By-Laws review "Committee advisors do not serve as members of an AAFCO committee, task force or work group, nor do they have a vote in any AAFCO deliberations" to better clarify member versus participation on committees, task forces or work groups.
- The By-Laws Subcommittee also discussed ethics on page 6 and our recollection was it didn't need a change. If not, we may want legal advice. We are also recommending all committee chairs sign the conflict of interest policy.

  Motion: That committee chairs and investigators also sign the conflict of interest disclosure statement. Motion: Ken; second Ali; motion withdrawn

  Action: By-Laws:
    1. Consider examples of potential conflicts that are open but don't preclude other issues.
    2. By-Laws investigate whether COI is needed where state/federal members have already signed COI with their respective employers. FDA will follow up where there are investigators that are FDA employees who have also signed COI.
    3. By-Laws: clarify whether it is COI that prohibits versus disclosure for evaluation and more education/awareness of AAFCO members who will be asked to sign COI.

2. Strategic Planning 2017–2020
    - To track progress the detailed activities, timelines, and responsible committee chairs can be found in the Feed BIN.
    - Key progress has been recorded in Attachment 1: Strategic Planning 2017–2020 updates from Annual 2018. Edits are in bold-italic text.

      Action: The Feed BIN will be updated based on Attachment 1.
3. Vision/Mission Discussion update: Stan

- Deliberated at Seminar 2018 and expect the work will be completed at Fall 2018 Board meeting (FDA)

4. Committee BIN Coach - Chad/Richard
   - Request from Committee Coordinator (President Elect: Bob Geiger) that Committees update their BIN Coaches and minimize use of Richard as he has been overcommitted via his presence on multiple committees.
   - Chad withdrawing
   - Stan volunteers!

   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, subject to editorial revisions - Bob; Second - Mark; Motion carries.

Action Item Table

Responsible	**Item**	**Action**	**Timing / Status**
Linda/ Committee Chairs	Strategic Plan priorities 2017-20	Update Feed BIN. Committee chairs asked to update as they make progress.	Update Feed BIN per August 2018 Annual meeting reporting.
Linda/President Elect (Stan/Bob G.)	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.	**Complete**
President Elect (Committee Coordinator)	eMeetings	Committees holding eMeetings need to be reminded to adhere to meeting notice requirements.	**Complete**
Board (charge) Working Group: Richard TE (lead), Michelle Illing., Dragan M., Bob W., Kent K., and Doug L., Richard S. PFI, Dave F. and Dave D.	Investigate AAFCO name change (American Feed to Animal Food or Feed)	Deferred to Board for direction on whether they want this to move forward. The Board met the same afternoon and supported further investigation. The Board will develop a charge.	WG report received. Committee voted against changing name. WG disbanded. **Complete**
By-Laws (Ken)	Participant meeting conduct	Consider more fulsome policy review regarding general conduct of all participants and who is responsible for taking action if necessary. Should also take current Ethics section in OP into consideration.	**Complete**
Board	Vision/mission statement review	Recommendation to the Board to consider holding a session to review and update the vision/mission statement as appropriate, with a facilitator experienced in this area. The Board met the same afternoon and supported holding a Board session at Seminar.	October 2018 Board session will be held to finalize.
By-Laws (Ken)	OP, page 20 Committee advisors sentence	Review "Committee advisors do not serve as members of an AAFCO committee, task force or work group, nor do they have a vote in any AAFCO deliberations." to better clarify member versus participation on committees, task forces or work groups.	January 2019

Responsible	Item	Action	Timing / Status
By-Laws (Ken)	AAFCO Conflict of Interest (COI) sign off for Chairs and Investigators	Consider examples of potential conflicts that are open but don't preclude other issues. By-Laws investigate whether COI is needed where state/federal members have already signed COI with their respective employers. FDA will follow up where there are investigators that are FDA employees who have also signed COI. By-Laws: clarify whether it is COI that prohibits versus disclosure for evaluation and more education/awareness of AAFCO members who will be asked to sign COI.	January 2019

Appendix 1: AAFCO Name Change Work Group Report to SAC 7/19/18

Work Group Recommendations:

1) Proceed with establishing a dba as "Association of Animal (Feed or Food) Control Officials". SAC to select feed or food.
2) Disband the working group.

Working Group participants:

Members - Richard TE (lead), Sue Hays, Michelle Illing., Dragan M., Bob W., Kent K., and Doug L.; Industry - Richard S. (or delegate he identifies), PFI will provide delegate, Dave F. and Dave Dzanis.

Board Charge to workgroup:

Investigate and make recommendations regarding changing AAFCO's name to accommodate members who may not be from "America". Include consideration of changing American to Animal and Feed to Food. Analysis of feed versus food should include implications for federal and state legislative terminology, international familiarity and use (e.g. proficiency testing program) as well as cost. If a name change recommendation has merit, guidance should also be given regarding process to implement. Acronym should remain the same.

Work Group comments:

There was concurrence that "American" should be changed to align with the Association's goals to engage more globally. The decision between Feed or Food has been pretty much evenly split whenever discussed.

The Executive Director is ready with the implementation steps to obtain the dba (doing business as). The process would only cost a few hundred dollars. It leaves the current legal entity of "Association of American Feed Control Officials" in place thus not disrupting references by state laws or our IRS tax exempt status. Sue and Richard will be available at the Strategic Affairs meeting on Wednesday to answer any other questions.

Work Group Meeting Notes:

strategic affairs minutes Jan 2018:

- AAFCO name (Attachment 1): in order to accommodate members who may not be from "America", there is a suggestion that the association name be revised.
- Suggestion is Association of Animal Food Control Officials to keep the AAFCO acronym. Conversations with international members favor a more overarching name.
- Need to investigate cost to change name.
- International interest in having international name. AAFCO is viewed narrowly as American.
- Animal Food versus Animal Feed terminology may be a challenge internationally. Feed is more recognized.
- WBFI changed institute to industry (filed Doing Business As (DBA)) reasonably easily, depends on state AAFCO is registered in.
- Proficiency testing program with international clients supports change (Animal Food) to reflect those outside the America term (e.g., Europe).
- LMSC also feels that most of the world transitioned to animal food a long time ago.
- Would also require review of association terminology respecting "feed" usage. DBA/State legislation is based on the underlying authority. Association name change may not impact.
- FDA: animal food term would cover animal feed. As well, a change from medicated feed to medicated food is under consideration. Will need communication/outreach effort to let stakeholders know if AAFCO name is changed.
- Need to check Codex terminology as they may be using animal feed. OIE refers to animal feed.

Action: Deferred to Board for direction on whether they want this to move forward. The Board met the same afternoon and supported further investigation by Richard Ten Eyck. They will develop a charge based on the blue text. Working Group participants identified if this moves this forward: Members - Richard TE (lead), Michelle Illing., Dragan M., Bob W., Kent K., and Doug L.; Industry - Richard S. (or delegate he identifies), PFI (Diane) will provide delegate, Dave F. and Dave D.

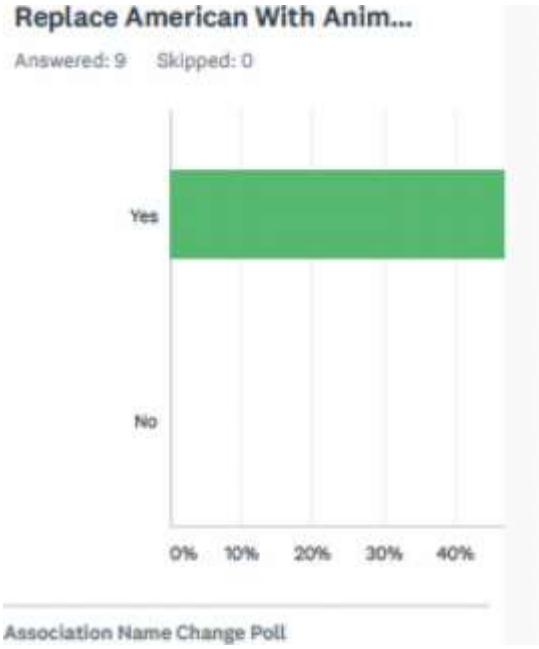
AAFCO name change. Cost of DBA, ask legal and accounting, pro con list Feed vs Food, report out 4/1/18 -to Linda

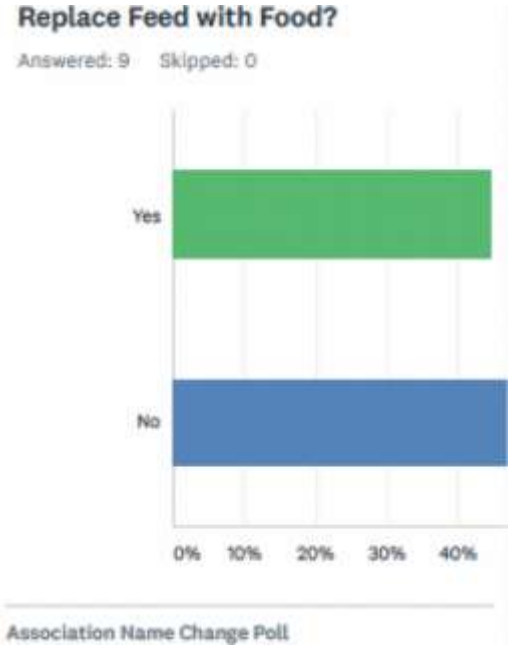
4/3/18

Missing information:

- Implementation Steps for DBA
- Deep look into state impacts

Still OK to use the word “feed” in other uses.
Next steps:
4/26/18
Discussion at seminar. Why not AAFCO, AAFCO International. Why change, What if other countries out vote us.
7/17/18
Setting up DBA is not difficult. Cost is about $200. The legal entity Association of American Feed Control Officials would continue to exist. Workgroup met by webinar got caught up and took a poll on choices. The use of “AAFCO” had no support. 100% preferred to change the American to Animal. The next table shows 5/4 split on not changing Feed to Food.





Attachment 1: Strategic Planning 2017–2020

Annual Meeting Committee Updates: September 12, 2018

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 action completed February 2018

Top 3 Priority Goals [FSMA TF activities integrated]

Updated text: italics/bold

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	Methods needs survey completed (vitamins top). General priority list established. **Vitamin and mineral workgroup in progress. FDA hazard guidance published January 23, 2018. Requires review of the methods list together with the hazard list and reprioritized. Anticipate draft for August 2018.** Need to identify resources to address backlog thereafter. 3-5 years to address backlog. ***August 2018 Update: Sugars and fructans methods submitted for ERP at AOAC Aug. 2018.*** ***Vitamin and Mineral group still in progress and have some funding requests. Hold pending hazard identification needs from 1.2***	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 **(Combined with activity 2.2 in FFIMC WG)**	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 published January 23, 2018.** Next step is to complete method needs statement for LMSC. Up to 3 years for subsequent method development and validation (dependent on whether there is existing method). Bob Waltz is lead (including LMSC representation). ***August 2018 Update: WG report filed with FFIMC. Hazard specific list not published. Hazards encountered to date were listed as guidance. Action levels not included. Work needed is very broad and will take years. Concern that tolerances are not available to inform method action levels. Group will deliberate refocusing to identify what can be done (e.g. identify hazards from those suggested that are higher risk (toxicity/likelihood) for which levels were used for regulatory action in prior incidents. Once guiding principles established, WG could transition to Sub-Committee to formally interface with LMSC to guide ongoing method needs (new or improved).***	FFIMC lead, EIC, ISC, IDC and LMSC

Outcome	Activity	Resources Needed	Timeline	Responsibility
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) 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 **Complete June 2018:** Laboratory sampling guideline. Work group established (ISC and LMSC reps) to develop RFP. ***August 2018 Update: RFP development in progress (with Sue's help) and hope to have to Board by January 2019. Starting with bag/probe sampling and several types of feed (particle sizes), analytes (e.g. protein, fat, fiber, Ca, P, Zn) under consideration need to include high, middle and low concentration as well as residue levels; will be consulting with Andy to address statistical validity.***	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	November 2017: Letter from President (Ken) to state Directors/Commissioners. LMSC WG for outreach to states and federal laboratories that are not attending to work on increasing participation (especially AFRPS). **Complete** ***August 2018 Update: Ongoing effort by LMSC to 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 and enforcement actions. Coordination of enforcement action.	Categorize Listserv topics to Feed BIN	Adminis-trative support Feed BIN	Archive Listserv is searchable. Categorization of active Listserv (**being done as part of next item (Sharing compliance letters and enforcement actions??**). North Carolina also has a "mini" Listserv. It is informal, but has national data. Membership for regulators is vetted in order to control access. **Hold: pending identification of additional EIC members to help.** ***August 2018 Update: ???***	EIC to designate lead with FASS support - Jennifer

Outcome	Activity	Resources Needed	Timeline	Responsibility
	Share compliance letters and enforcement actions	Guidance from subject matter experts	Call January 2018: Need searchable and secure IT solution; can be done fairly easily and quickly according to Food Shield IT expert. Confidential company info release could be an issue for states. ***August 2018 Update: WG, Surveyed 700 members, 44 responded (6%) regarding needs. RFP developed and sent to 4 companies. Three responded with proposals…. WG turnover necessitates change in members. George Ferguson, Erin Bubb and Richard Ten Eyck were to review the 3 proposals to make recommendation to EIC.***	EIC to designate lead with FASS support
	Share Division of Animal Feed letters		**Consider making it a component of item above (Sharing compliance letters and enforcement actions).** ***August 2018 Update: ??? Note: if Food Shield is not the platform then FDA will be challenged to share…***	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		No action due to lack of members willing to lead. ***August 2018 Update: ???***	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	No action; still seeking lead. ***August 2018 Update: This is a big lift for the EIC due to individual time commitment. Possible the EIC may defer.***	EIC to designate lead with FASS support
2.2 *** FSMA TF part of Item 3: Enforcement strategy for contaminants/hazards (Combined with activity 1.2 in FFIMC WG)	~~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 published January 23, 2018.~~	~~FFIMC lead, EIC, ISC, IDC and LMSC~~
2.3 ** Enhanced use of Feed BIN	Identify activities to enhance use	Financial support	**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	**Complete** Grant application successful and SME identified. ***Framework developed and finalizing August 2018.*** 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		**Complete January 2017**	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 developed (activities detailed in Feed BIN). 2017 initiated biannual newsletter. Draft plan developed February 2017 included both generic and ongoing activities. ***August 2018 Update: Revising to make generic. Ongoing activities will be part of CIOC regular work. Expect to finalize Board/member approval January 2019.***	CIOC

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. Document finalized. Need mechanism to keep updated, likely via George's group. Developed training calendar in Feed BIN. **Complete Spring 2018 See 3.2** ***WG also met and learned about BIN; have been adding to calendar. Point of contact and ongoing addition - Jeff; also seeking industry input so their training can be input.*** ***WG disbanded.***	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. Covers 3.1 and 3.2. Catalogued and categorized (per vote 3.1 above). Basic/Advanced terminology means different things for AAFCO(BITS/AITS), IFPTI and potentially individual **states. Decided that categorization would also contain disclaimer allowing state discretion in courses they require for their inspectors.** **Complete Spring 2018: See 3.1** ***In Feed BIN. WG disbanded.*** ***August 2018 Update: Not on Strategic Plan, but identified via ETC. Investigating software program that could track training of AAFCO members (Learning Management System). Considered 5 firms, including Knowledge Vault who declined. Selected 2 (Litmos and digitalChalk (also used by NGFA)) for full demonstration. Both met all needs. digitalChalk favoured and most price effective: $8.4K for 500 active users.*** ***Recommendation/motion approved: move forward to Board to proceed with RFP (especially the 2 firms) to acquire a system.***	ETC

Outcome	Activity	Resources Needed	Timeline	Responsibility
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 follow-up conversation with Tim W., Dan D. and Ali K.	Subject matter experts. Potential travel for non-Co-Ag contract states	Work group formed. Drafted (3 part: policy overview, training plan (modified yearly for employee) and forms). ISC supplied material to ETC who drafted document. (Jim True interface as he is on both committees). ***August 2018 Update: Comments back from ISC and incorporated, no additional comments - presented final model training manual to committee; audited against animal feed standards (2 and some of 3, awa sampling and work planning). Recommend use and revisions thereafter. Offered to run webinar. Sent to FASS as pdf. Document has been shared with the Committee throughout the process. Committee will review and expect online vote within 30 days to have for Board and membership vote January 2019.*** **Complete August 2018 subject to Board/member acceptance.**	ETC (George F. lead) 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	Evaluated the GMP inspection of feed manufacturers against feed ingredient manufacturers and feel the general manufacturing training is adequate for both. Next step will be assessment respecting hazard analysis by August 2018. ***August 2018 Update: Eric to work with Jenny FDA to move forward with draft by January 2019***	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.	***August 2018 Update: FDA (Kevin K.) continues to edit as information is received. Expect to complete within 60 days for ISC to approve by January 2019.***	ISC supported by LMSC and ETC

**Top 3 outcomes identified at May 2, 2016, 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
Stan Cook	✓	✓	Board/Chair

Name	Priority voting pre-meeting	Attended May 2	AAFCO role
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

Notes