



Association of American Feed Control Officials

**2020 AAFCO Midyear Meeting  
Committee Reports**



**January 21–23, 2020**

**Hyatt Regency**

**Albuquerque, New Mexico**





## Contents

<b>Association Business Meeting Minutes</b> .....	<b>2</b>
<b>Current Issues and Outreach Committee Report</b> .....	<b>11</b>
<b>Education and Training Committee Report</b> .....	<b>12</b>
Appendix 1: State Training Needs Survey Results.....	14
<b>Feed and Feed Ingredient Manufacturing Committee Report</b> .....	<b>19</b>
<b>Feed Labeling Committee Report</b> .....	<b>21</b>
Feed Labeling Committee Special Meeting Minutes .....	23
<b>Ingredient Definitions Committee Report</b> .....	<b>26</b>
Appendix 1, IDC meeting 8/6/19 .....	30
Ingredient Definitions Committee 9/26/2019 Webinar .....	32
Appendix 2. IDC e-Meeting 9/26/19 Documents .....	35
<b>Inspection and Sampling Committee Report</b> .....	<b>41</b>
<b>Laboratory Methods and Services Committee Report</b> .....	<b>44</b>
Appendix 1 .....	47
<b>Model Bills and Regulations Committee Report</b> .....	<b>48</b>
Attachments for August 5, 2019, Meeting.....	50
Model Bills and Regulations Committee E-Meeting.....	52
Attachment for October 25–30, 2019, E-Meeting .....	53
<b>Pet Food Committee Report</b> .....	<b>54</b>
<b>Proficiency Testing Program Committee Report</b> .....	<b>56</b>
<b>Strategic Affairs Committee Report</b> .....	<b>60</b>
Appendix 1: By-Law Subcommittee Report 05/30/19 .....	64
Attachment A.....	64
Appendix 2: Travel Procedures.....	65
Appendix 3: Board/Chair Session with 2 Added Goals and Midyear 2019 Updates .....	67

**Association Business Meeting Minutes**  
2019 AAFCO Annual Meeting  
August 5, 2019, 9:44–10:14 am, Louisville, Kentucky

**Agenda**

- 1) Bob Geiger convened business session of the Association at 9:44am.
  - 1) Presentation of Awards
    - a) **Presidential Awards**
      - i) Katie Simpson: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - ii) Stan Cook: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - iii) Riley Franklin: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - iv) Melanie Marquez: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - v) Alisha Christian: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - vi) Jason Schmidt: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - vii) Bill Bookout: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - viii) Bill Burkholder: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - ix) Angele Thompson: For dedicated teamwork in furthering the association at Pet Food Forum 2019
      - x) Jo Lynn Otero: For dedicated teamwork in furthering the association at Pet Food Forum 2019
    - b) **Distinguished Service Award**
      - i) Erin Bubb In recognition of her hard work and significant leadership of AAFCO and its members in organizing and managing the 2018 & 2019 Feed Administrators Seminar.
      - ii) Dave Dressler In recognition of his hard work and significant leadership of AAFCO and its members in organizing and managing the 2018 & 2019 Feed Administrators Seminar.
    - c) **E. B. Voorhees Award**
      - i) Dr. Ali Kashani: For a career of outstanding vision, leadership, promotion and dedication to the association and assuring safe animal feed.
- 2) Kristen Green 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, Feed Labeling eMeeting 2/19/19; Ingredient Definitions Committee 1/22/19, Ingredient Definitions eMeeting 4/4/19; Inspection and Sampling, Laboratory Methods & Services, Model Bills and Regulations, Pet Food, Proficiency Testing, Strategic Affairs and recommends the same to the membership. I so move. **Dave Phillips Seconds. MOTION CARRIES**
- 3) **Acceptance of Committee Recommendations:** –Kristen Green, President-Elect  
**Ingredient Definitions 1/22/19, eMeeting April 4**  
**Report starts on page 21 of the Committee Report Book**
  - 1) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the IDC and recommends the same to the membership to Revise Feed Term “Canned” to read: Canned (Process) a term applied to animal feed which has been processed, commercially sterilized, and sealed according to 21 CFR part 113 in hermetically sealed containers such as but not limited to cans, pouches, tubs and trays. I so move. **Jacob Fleig Seconds. MOTION CARRIES.**
  - 2) Kristen Green states the AAFCO Board of Directors did not accept the recommendation from the IDC to Publish the New Feed Term “Slaughter” to read: Slaughter a process of killing an

- animal for food or feed and recommends the same to the membership. I so move. **Dave Dressler Seconds. MOTION CARRIES.**
- 3) Publish the following tentative definitions as Official and remove the existing Official definition, if any.
- a) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the IDC to **T71.40 Low Glucosinolate High Erucic Acid Rapeseed Meal, Solvent Extracted,\*\*** in the AAFCO Official Publication as a tentative definition and remove the existing Official definition, if any and recommends the same to the membership. I so move. **Bob Church Seconds. MOTION CARRIES**
- i. **T71.40 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)  
 Note: \*\* after an ingredient name means the words “Mechanical Extracted” or “Solvent Extracted” are not required when listed as an ingredient in a manufactured feed.
- 4) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the IDC and recommends the same to the membership to establish and publish in the AAFCO Official Publication a new tentative definition for **T3.1 Suncured Alfalfa Meal, or Pellets, or Ground Alfalfa Hay**. Leave 3.1 in place. I so move. **Jacob Fleig Seconds MOTION CARRIES**
- a) **T3.1 Suncured Alfalfa Meal, or Pellets, or Ground Alfalfa Hay:**  
 is the aerial portion of the alfalfa plant, reasonably free of other crop plants, weeds, and mold, which has been dried by solar means, stored as bales or stacks, and finely or coarsely ground. If it is chopped instead of ground, it must be designated as “Suncured Chopped Alfalfa” or “Chopped Alfalfa Hay”. **If the ingredient is further dehydrated by thermal means after being ground, it must be designated as “Dehydrated Suncured Alfalfa Meal, or Pellets”**
- 5) Modify and publish the following definitions as Official in the Official Publication:
- a) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the IDC to publish **33.17 Gamma-linolenic acid safflower oil** as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Jacob Fleig Seconds. MOTION CARRIES**
- i. **33.17 Gamma-linolenic acid safflower oil** The food additive, gamma-linolenic acid safflower oil, may be safely used in animal food as a source of gamma-linolenic acid and other omega-6 fatty acids in accordance with the following conditions:
- (a) The additive is the oil obtained from whole seeds and/or partially dehulled seeds of a *Carthamus tinctorius* L. safflower Centennial variety genetically engineered to express the delta-6-desaturase gene from *Saprolegnia diclina* Humphrey. The 453 amino acid, delta-6-desaturase enzyme converts the fatty acid linoleic acid to gamma-linolenic acid (all-cis-6,9,12-octadecatrienoic acid) during seed development.
- (1) The additive obtained from the seeds of the genetically engineered safflower Centennial variety may be blended with oil obtained from seeds of non-engineered oleic acid safflower varieties in order to meet the specifications required for the additive or the blend in paragraph (a)(2) of this section.

- (2) The additive or a safflower oil blend containing the additive for use in animal food meets the following specifications:
  - (i) Crude fat content of the additive or the safflower oil blend is not less than 99.5 percent.
  - (ii) Gamma-linolenic acid content is between 350 and 450 milligrams (mg) gamma-linolenic acid per gram of the additive or the safflower oil blend.
  - (iii) Total content of stearidonic acid and cis, cis-6,9-octadecadienoic acid in the additive or the safflower oil blend must not exceed a total of 0.3 percent.
- (b) Addition of the additive, or the safflower oil blend, to complete dry adult maintenance dog food must meet the following:
  - (1) Addition of the additive or the safflower oil blend cannot provide more than 36 mg gamma-linolenic acid per kilogram body weight of the dog per day in more than 86 mg of the additive or the safflower oil blend. This maximum addition rate of the additive, or the safflower oil blend, is 0.3 percent of a complete dry adult maintenance dog food containing 3,600 kilocalories of metabolizable energy per kilogram of food as-fed.
  - (2) Adjustments must be made for differing concentrations of gamma-linolenic acid and for dog food formulas of different caloric density and/or that are fed to specific weights, breeds, or dogs of different activity levels to meet the requirements of this paragraph.
- (c) Addition of the additive, or the safflower oil blend, to complete dry adult maintenance cat food must meet the following:
  - (1) Addition of the additive or the safflower oil blend cannot provide more than 33 mg gamma-linolenic acid per kilogram body weight of the cat per day in more than 79 mg of the additive or the safflower oil blend. This maximum addition rate of the additive, or the safflower oil blend, is 0.5 percent of a complete dry adult maintenance cat food containing 4,000 kilocalories of metabolizable energy per kilogram of food as-fed.
  - (2) Adjustments must be made for differing concentrations of gamma-linolenic acid and for cat food formulas of different caloric density and/or that are fed to specific weights, breeds, or cats of different activity levels to meet the requirements of this paragraph.
- (d) To assure safe use of the additive, in addition to other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling of the additive shall bear the following:
  - (1) The name of the additive, gamma-linolenic acid safflower oil, or GLA safflower oil;
  - (2) A guarantee for the minimum content of gamma-linolenic acid; and
  - (3) Adequate directions for use such that the finished animal food complies with the provisions of paragraphs (b) and (c) of this section.

(Proposed XXXXX) 21 CFR 573.492.

- b) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the IDC to publish **73.046 Silicon dioxide** as Official in the AAFCO Official Publication and recommends the same to the membership. I so move. **Austin Therrell Seconds.**

**MOTION CARRIES**

- i. **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:

<b>34 Feed component</b>	<b>Limitations (percent)</b>
BHT (butylated hydroxytoluene)	2
Methionine hydroxy analog and its calcium salts	1
Piperazine, piperazine salts	0.8
Sodium propionate	1
Urea	1
Vitamins <sup>a</sup>	3

- (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:

<b>Feed component</b>	<b>Limitations (percent)</b>
Flavors	50
<b>Selenomethionine hydroxy analogue</b>	<b>95</b>

- (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, Amended 2018, **Amended xxxx**)

<sup>a</sup>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.

- 6) Publish the following new definition as Tentative in the Official Publication:

- a) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the IDC to publish **T60.118 Ground Juniper** in the AAFCO Official Publication as a new tentative definition and recommends the same to the membership. I so move. **Ben Jones Seconds. MOTION CARRIES**

i. **T60.118 Ground Juniper:**

is a roughage consisting of the entire aerial portion of the juniper plant (trunk, bark, branches, leaves, and berries), obtained only from *Juniperus pinchotii* and/or *Juniperus ashei*. Any plant part below ground level is excluded to avoid contamination with soil and/or rocks. It is ground to pass a screen no larger than 5/8 inches (15.875 mm). The ingredient must be guaranteed for crude protein and acid detergent fiber. Ground juniper is to be fed as a dietary roughage for cattle, sheep, or goats in accordance with good feeding practices. (proposed xxxx)

- 7) Publish the following new definition as Official in the Official Publication:

- a) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the IDC to publish **57.168 Selenomethionine hydroxy analogue** as Official in the AAFCO Official Publication and recommends the same to the membership. I so move.

**Ken Bowers Seconds. MOTION CARRIES**

i. **57.168 Selenomethionine hydroxy analogue:**

Selenomethionine hydroxy analogue [R,S-2-hydroxy-4-methylselenobutanoic acid (CAS 873660-49-2)] is manufactured by the reaction of elemental selenium with methyl lithium to form a methylseleno salt, which is then reacted with R,S-2-hydroxybutyrolactone to form a salt of 2-hydroxy-4-methylselenobutanoic acid. After acidification and purification, the additive consists of not less than 39.5 percent total selenium by weight with a selenomethionine hydroxy analogue content of not less than 98 percent of total selenium. The total organic selenium content of the additive is not less than 99 percent of total selenium.

- (1) The selenomethionine hydroxy analogue meets the following specifications:
- (i) Arsenic, not more than 2 parts per million (ppm);
  - (ii) Cadmium, not more than 1 ppm;

- (iii) Lead, not more than 1 ppm; and
  - (iv) Mercury, not more than 1 ppm.
  - (2) Selenium, as selenomethionine hydroxy analogue, is added to complete feed for chickens, turkeys, and swine at a level not to exceed 0.3 ppm.
  - (3) To ensure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling of selenomethionine hydroxy analogue in its packaged form shall contain:
    - (i) The name, selenomethionine hydroxy analogue;
    - (ii) Minimum and maximum guarantees for a total selenium content of not less than 2.08 percent (weight/weight) and not more than 2.24 percent;
    - (iii) Minimum guarantee for selenomethionine hydroxy analogue content of not less than 5.2 percent;
    - (iv) The following statement, ``Storage Conditions: Selenomethionine hydroxy analogue must be stored in a closed package at temperatures not higher than 20°C (68°F)."; and
    - (v) An expiration date not to exceed 1 year from the date of manufacture.
  - (4) Selenomethionine hydroxy analogue, shall be incorporated into each ton of complete feed by adding no less than 1 pound of a premix containing no more than 272.4 milligrams of added selenium per pound.
  - (5) The premix manufacturer shall follow good manufacturing practices in the production of selenium premixes. Inventory, production, and distribution records must provide a complete and accurate history of product production. Production controls must assure products to be what they are purported and labeled. Production controls shall include analysis sufficient to adequately monitor quality.
  - (6) The label or labeling of any selenium premix shall bear adequate directions and cautions for use including this statement: "Caution: Follow label directions. The addition to feed of higher levels of this premix containing selenium is not permitted."
- (Proposed XXXX) 21 CFR 573.920

#### **Model Bills:**

#### **Report starts on page 45 of the Committee Report Book**

- 1) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee that the following revisions be made to the Statements for Uniform Interpretation and Policy (SUIP) of Chapter 5 in the AAFCO Official Publication to add the following preamble to the SUIP section of the AAFCO Official Publication, and recommends the same to membership. I so move. **Doug Lueders Seconds. MOTION**

#### **CARRIES**

This section includes Statements for Uniform Interpretation and Policy (SUIP) of the AAFCO Model Bills and Regulations. In general, AAFCO SUIPs do not establish legally enforceable responsibilities. Instead, these SUIPs describe AAFCO's current thinking on a topic and should be viewed only as recommendations, in the absence of specific regulatory or statutory requirements. There are many pathways for statements to be published in Chapter 5, one of which is by recommendation from the AAFCO Model Bills and Regulations Committee to the AAFCO Board of Directors as a means of further clarification and interpretation. These statements should shall be reviewed every two years on odd number years at the AAFCO Mid-Year Meeting by a subgroup of the Model Bills and Regulations Committee to determine relevancy and applicability, then deleted or moved to the appropriate section of the Official Publication when such actions are warranted.

- 2) Kristen Green states the AAFCO Board of Directors accepted the recommendation from the Model Bills and Regulations Committee to delete SUIP 10 and recommends the same to membership. I so move. **Austin Therrell Seconds. MOTION CARRIES**

Brand Names - The registration of feeds under the same brand name by two or more registrants shall be discouraged. This shall apply also to products with brand names so similar in character that such are likely to be confused by the purchaser. Whenever the same brand name, or one very similar, is offered by another firm, the registration official



shall acquaint both firms with the facts so that confusion associated with duplication may be avoided. (Adopted 1958, Amended 1963)

- 3) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Model Bills and Regulations Committee and recommends the same to membership to move SUIP 15 – Raw Leather Residue to Regulation 10 – Adulterant of the Model Regulations under the Model Bill by adding the following language:

10(a)(6) Raw leather residue from tanning or leather manufacturing

I so move. Doug Lueders Seconds. **MOTION CARRIES**

- 4) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Model Bills and Regulations Committee and recommends the same to membership to delete SUIP 15 if Regulation 10(a)(6) is approved. I so move. **Jacob Fleig Seconds. MOTION CARRIES**

- 5) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Model Bill and Regulations Committee and recommends the same to membership to add Regulation 8(b) language to the Model Regulations under the Model Bill based on SUIP 19 regarding Feeding or Use Directions for Feeds Containing High Levels of Non-Protein Sources of Nitrogen and moving current Regulation 8(b) and (c) items to Regulation 8(c) and (d) respectively. I so move. **Mark LeBlanc Seconds. MOTION CARRIES**

8(b) Feeding or use directions for those feeds in which more than 50% of the protein content is derived from non-protein nitrogen sources should include recommendations as to providing adequate supplies of drinking water, sources of energy, forages being fed, minerals, adaptation ("warm-up") periods and stress conditions when necessary.

- 6) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Model Bills and Regulations Committee and recommends the same to membership to delete SUIP 19 if Regulation 8(b) is approved. I so move. **Doug Lueders Seconds. MOTION CARRIES**

- 7) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Model Bills and Regulations Committee and recommends the same to membership to revise Regulation 4 – Expression of Guarantees of the Model Regulations Under the Model Bill. I so move. **Doug Lueders Seconds. MOTION CARRIES**

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.

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 **genus and** species in order of predominance, and shall be stated and conform to the following:

(1) Colony forming units per gram (CFU/g) **or per pound (CFU/lb.)** consistent with the directions for use; or

~~(2) Colony forming units per pound (CFU/lb.) consistent with the directions for use; or~~

(2) 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.

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 **the** directions for use; or
  - (3) 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.
  - (4) 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.

- 8) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Model Bills and Regulations Committee and recommends the same to membership to revise Regulation PF4 – Expression of Guarantees of the Model Regulations for Pet Food and Specialty Pet Food Under the Model Bill. I so move. **Doug Lueders Seconds. MOTION CARRIES**

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...
- 9) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Model Bills and Regulations Committee and recommends the same to membership to revise Regulation PF9 – Statements of Calorie Content of the Model Regulations for Pet Food and Specialty Pet Food Under the Model Bill. I so move. **JoLynn Otero Seconds. MOTION CARRIES**

- (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:

#### **Strategic Affairs:**

#### **Report starts on page 66 of the Committee Report Book:**

- 1) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Strategic Affairs Committee and recommends the same to membership to edit Advisors on page 20 of the 2019 OP. I so move. **Mark LeBlanc Seconds. MOTION CARRIES**

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 (including subcommittees), 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 committee level ~~any~~ AAFCO deliberations. Committee advisors serve as a voting member of work groups and task forces supporting the respective committee. Any advisor who behaves in a manner

disruptive to committee business is 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)

- 2) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Strategic Affairs Committee and recommends the same to membership to edit Advisors on page 102 of the 2019 OP and page 14 of the Procedures Manual. I so move. **Jacob Fleig**

**Seconds. MOTION CARRIES**

**Advisors** – May be requested by the President to represent industry/trade and consumers groups on AAFCO committees (including subcommittees), task forces, or working groups. Following all nominations, the President, with the advice of the Board, may accept representatives. The President may also choose to appoint other individuals. Generally, the President and Board take into consideration the individual's demonstrated expertise on a given subject matter, their willingness to work with others in AAFCO, and their ability to facilitate the goals of the organization. These advisors will be called upon to answer questions relevant to animal nutrition, analytical expertise, industry practices, or other pertinent question. The number of advisors is usually limited by the size of the committee. ~~In accordance with the By Laws, advisors cannot vote at the committee level or above.~~ Committee advisors do not serve as members of an AAFCO committee, nor do they have a vote in committee level deliberations. Committee advisors serve as a voting member of work groups and task forces supporting the respective committee. Any advisor who behaves in a manner disruptive to committee business is subject to removal as an advisor to the committee by the AAFCO President.

- 3) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Strategic Affairs Committee and recommends the same to membership to edit Subcommittees on page 102 of the 2019 OP and page 14 of the Procedures manual. I so move. **Sally Flowers**

**Seconds. MOTION CARRIES**

**Subcommittees** – Are made up of committee members and are "task/topic specific" (e.g., By-Laws Subcommittee of Strategic Affairs), used to divide responsibilities, or focus work, into more manageable groups of interest or expertise. Subcommittees do not generally have time restrictions imposed on their existence, and work tends to be a subset of the standing committee charge(s). Subcommittees may be created by a committee chair, as needed, to address the needs on the committee function. ~~Advisors may be asked to provide input into the subcommittee makeup.~~

- 4) Old Business

- a) Common or Usual Feed Term

**Doug Lueders MOTION to remove from table. Richard Ten Eyck Seconds. MOTION CARRIES.**

**Kristen Green MOTION to accept the proposed feed term. Doug Lueders seconds. MOTION FAILS.**

- 5) Kristen Green states the AAFCO Board of Directors accepted the recommendation from The Nominating Committee and recommends the same to membership for the 2020 Board of Directors. I so move. **Doug Lueders Seconds. MOTION CARRIES.**

President: Kristen Green, KY

Past President: Bob Geiger, IN

Secretary Treasurer: Ali Kashani, WA

President Elect: Erin Bubb, PA

Director: George Ferguson, NC

Director: Austin Therrell, SC

Director: Hollis Glen, CO

Director: Eric Brady, TN

Director: Joshua Arbaugh, WV

**This concludes committee and board recommendations needing membership approval.**

**10:14am Ali Kashani MOTION to adjourn business meeting. Heather Bartley Seconds.**

**MOTION CARRIES**

- 6) **Credential Report – FASS**

Number of Voting Member States Represented - 32

Number of States in attendance - 46

Number of Countries - 6

Number of FDA Representatives - 45

Number of Life Members - 4

Total Meeting Attendance - 478

**October 17, 2019 - Austin MOTION to approve Association Business meeting minutes. Kristen Green Seconds. MOTION CARRIES**

## Current Issues and Outreach Committee Report

2019 AAFCO Annual Meeting  
August 5, 10:30 am, Louisville, Kentucky

**Committee Recommendations:** None

**Board Recommendations:** Report accepted October 17, 2019

**Association Recommendations:** None

### Committee Participants

**Members Present:** Ali Kashani – WA (Committee Chair); Jennifer Combs (KY), Jo Lynn Otero (NM), Kristen Green (KY), Kent Kitade (Life Member), Tim Lyons (MI), Chad Linton (WV), Caitlin Price (NC), Eric Nelson (FDA), Shaness Thomas (FL).

**Advisors Present:** David Dzanis (APPA), David Fairfield (NGFA), David Meeker (NRA) [Tim Law, (Alternate for NRA)], Emily Bultan Helms (ETA), Julia Fidenzio (APPA), Louise Calderwood (AFIA), Pat Tovey (PFI), Steve Younker (AFIA), Tomas Belloso (NGFA).

### Committee Report

The meeting started at about 10:30 AM with the welcoming/opening remarks by Ali Kashani. New Co-Vice Chairs, Jennifer Combs and Jo Lynn Otero were introduced. Jenny and Jo Lynn announced their plans to review and initiate the communication plans/tasks that had been identified by the Strategic Affairs committee and listed in the AAFCO strategic planning. The AAFCO blogs replacing semi-annual newsletters were then announced as well as plans for changes to the first-time attendee receptions. Kathrine (Kathy) Fedder, representing International Food Protection Training Institute (IFPTI) introduced the speaker, Ashlee-Rose, RS, Animal Feed Regulatory Program Standards Coordinator with Washington State Department of Agriculture. Ashlee-Rose, a graduate of the fellowship leadership Program sponsored by IFPTI, presented the result of her research/survey project titled – “Estimating Risk Factors and Analyzing Regulatory Authority”.

**Outreach Work Group –** Jennifer Combs - KY & JoLynn Otero - NM

A work group was formed during the 2019 Annual Meeting in Louisville, KY to address Strategic Plan # 7.2 Mentoring. The charge of the workgroup is to redesign AAFCO 101 as a new member session during the meetings; and to create a mentoring engagement plan with implementation tracking and reporting.

**Work Group Members:** Jennifer Combs (Lead) – (KY); JoLynn Otero (Lead) – NM; Nathan Price – ID; Kent Kitade – life member; Burnadett Mundo – SC; Madison Starnes – SC; Heather Bartley – WI; Dana Brooks – PFI; Dave Fairfield – NGFA; Cathy Alinovi – NGPF.

**Other Business:** None

No further discussion or topics were brought to the attention of the committee and the meeting was adjourned.

**Action Item Table**

Responsible	Item	Action	Timing / Status
Work Group	Outreach & Mentoring	Redesign AAFCO 101 as a new member session during the meetings	January 2020
Work Group	Outreach & Mentoring	Create a mentoring engagement plan with implementation tracking and reporting	January 2020

## Education and Training Committee Report

2019 AAFCO Annual Meeting  
August 7, 9:00–10:00 am, Louisville, Kentucky

**Committee Recommendations:** None

**Board Recommendations:** Report accepted October 17, 2019

**Association Recommendations:** None

### Committee Participants

**Members Present:** Marissa Kost – NC, Liz Beckman – WA, Kate Nelson – CT, David Dressler – PA, David Edwards – FDA, Jacob Fleig – MO, Kristen Green – KY, Shannon Jordre – FDA, Rick Manthei – MN, Jo Lynn Otero – NM, Shaness Thomas – FL, Jim True – KY, Darlene Krieger – FDA, Tim Lyons – MI, Robert Murray – CFIA

Members via Phone: George Ferguson – NC

**Advisors Present:** David Fairfield – NGFA, Pat Tovey – PFI, Felicity Mejeris – NASDA, Lorri Chavez – PFI, Scott Ringger – AFIA

**Others Present:** Susan Hays – AAFCO

### Committee Report

Marissa Kost (Committee Chair) called the meeting to order at 9:06 AM (EST). Members and advisors in the room introduced themselves.

- **Training Calendar Workgroup:** Available trainings have been added to the FeedBIN calendar. Jeffrey Scallan, LA, will remain the primary contract to add trainings to the calendar, with Marissa Kost, NC, as the secondary contact.
- **State Training Needs Survey Workgroup:** Marissa Kost, NC, updated workgroup progress. The survey was distributed to members in February for a minimum of 30 days for completion. The results indicated that the topics nutritional toxicities and medicated feed were the most popular. Pet food labeling was also a popular choice for continued trainings. Pat Tovey, PFI, suggested combining the pet food labeling guide with the OP. The largest obstacles were required travel, lack of time, and cost. The results (Appendix 1) have been sent to the BOD and committee chairs to identify where committees could provide training for the gaps.
- **OTED Training Updates:** Janet Williams, FDA, and Kimberly Hull, FDA, discussed the re-alignment of OTED staff into 4 divisions. They also discussed available courses for Animal Food Regulators and prerequisite courses. The upcoming training schedule (18-month platform) includes 4 cGMP courses and 4 PC courses in the following locations: Indianapolis, IN, Charlotte, NC, Seattle, WA, and Fort Worth, TX. Except for Indianapolis, IN (due to the federal holiday), the cGMP course will be offered one week with the PC course offered the following week. For specific dates, the ORAU Pathlore portal has been updated with the schedule. As a reminder, there are various general education courses posted online currently. OTED is also working on fixing the medicated feed online course.
- **BITS and AITS Update:** Miriam Johnson, NC, Inspection & Sampling Committee Chair, updated the committee on the most recent AITS that took place in Montgomery, AL this past June. There were 27 attendees representing 13 states. The standardized agenda and CLEAR was utilized during this training, with the recommendation to continue using CLEAR as part of AITS. The feedback indicated some repeated material from BITS to AITS. The agenda will continue to be reviewed and changes will be made as necessary. A survey may be distributed to gauge if BITS and AITS still need to be hosted annually. BITS will be hosted in Atlanta, GA next month. If any states are interested in hosting AITS or BITS next year, please contact Miriam Johnson or Jessica Gore, NC.
- **Industry Training Update:** Scott Ringger, AFIA, updated the committee on available industry trainings. The FSPCA training has been posted on the FeedBIN calendar. Contact Jeff, Marissa, or Scott to add other trainings or events that should be made available to members.
- **Workshop Calendar Request Update:** Marissa Kost, NC – The Training Proposal form should be utilized for submitting workshop or training requests. As a reminder, the proposal form can be found

in the FeedBIN. Kate Nelson, CT, will assist with any future projects in the BIN for the trainings. Currently, the ETC does not have any pending workshop or training requests. Scott Ringger, AFIA, advised committees planning future workshops at meetings to consider how to best utilize time at these trainings. There was discussion to host a GRAS Notice training at the upcoming Annual Meeting in Baltimore, MD. The IDC is requesting assistance in organizing this training. Additionally, there was discussion to host a Livestock Feed Labeling workshop for the Midyear Meeting in Albuquerque, NM. Dave Dressler, PA, Feed Labeling Committee Chair, will put together a workgroup. Shannon Jordre, FDA, suggested adding Blue Bird Labels to the feed labeling workshop agenda or as its workshop at another date.

- **LMS (DigitalChalk) Update:** Marissa Kost, NC, updated the committee on the progress of the LMS. DigitalChalk is currently up and running with many features available. George Ferguson, NC, will be doing a demo at the AFRPS Face-to-Face Meeting in AL at the end of this month. If there is interest, Marissa Kost, NC, is available to do a more extensive demo at the Midyear Meeting in NM.
- **New Business:**
  - o Darlene Krieger, FDA, suggested leadership training for AAFCO members that take on leadership roles in a committee.  
ACTION: Chair formed a working group to review available leadership training to be made accessible to AAFCO members. Darlene Krieger will be workgroup lead. Workgroup members: Jo Lynn Otero – NM, Jacob Fleig – MO, George Ferguson – NC, Jim True – KY.
  - o Shannon Jordre, FDA, suggested that ETC could consult with other committees for surveys and assist them regarding content and layout.
  - o Midyear Meeting 2021: No training has been decided at the time of the meeting. Dave Edwards, FDA, proposed hosting a medicated feed labeling workshop. The Feed Labeling Committee will be consulted regarding this request as well as the possibility of scheduling labeling workshops (i.e., Non-Medicated [Livestock] Feed Labeling, Medicated Feed Labeling, Pet Food Labeling) on a 3-year rotation.
    - Upon completion of the meeting, it was decided that the Medicated Feed Labeling workshop will be hosted at the upcoming 2020 Midyear Meeting in Albuquerque, NM.
  - o George Ferguson, NC, proposed creating a Continuing Education training to assist AFRPS states to fulfill their requirement to participate in CE. The input from other committees would be valuable in determining which trainings would be helpful for CE.
  - o David Beard, WA, suggested an AAFCO/FDA ingredient definition approval training for mainly industry at the 2021 Annual Meeting in Omaha, NE.

**Meeting adjourned at 10 AM (EST).**

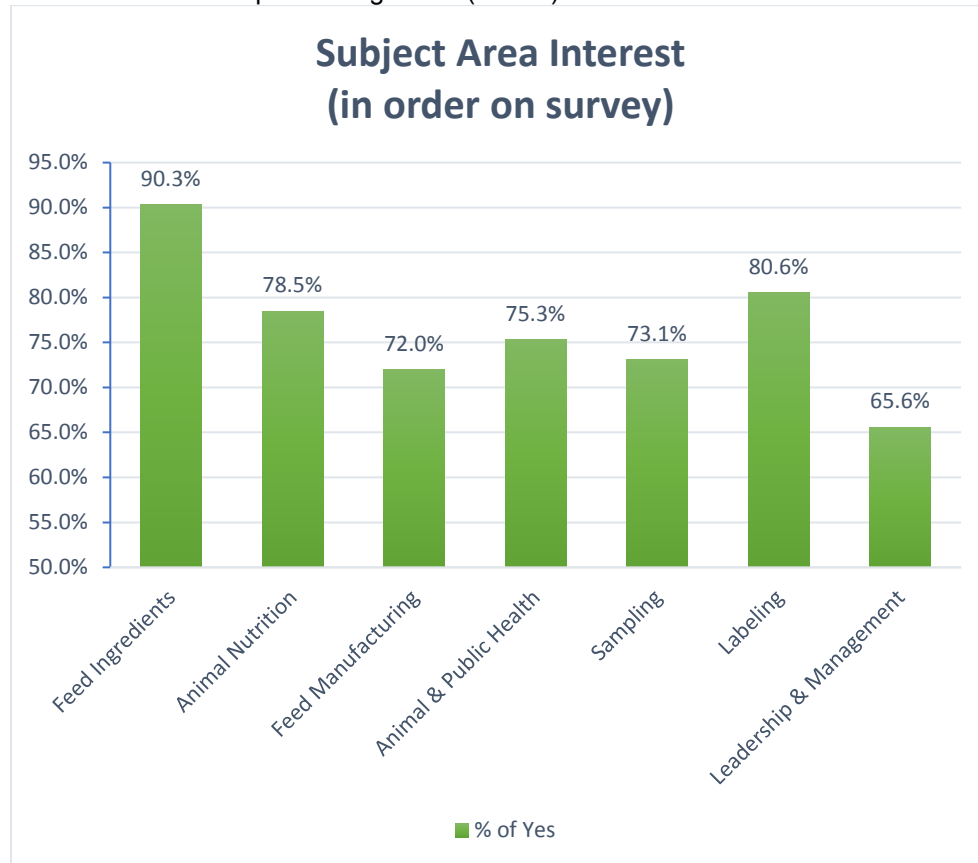
**Action Item Table**

Responsible	Item	Action	Timing / Status
Darlene Krieger	Leadership Training	Review previous material with workgroup	Midyear Meeting

**Minutes approved 10/4/19. 15 voting in the affirmative.**

## Appendix 1: State Training Needs Survey Results

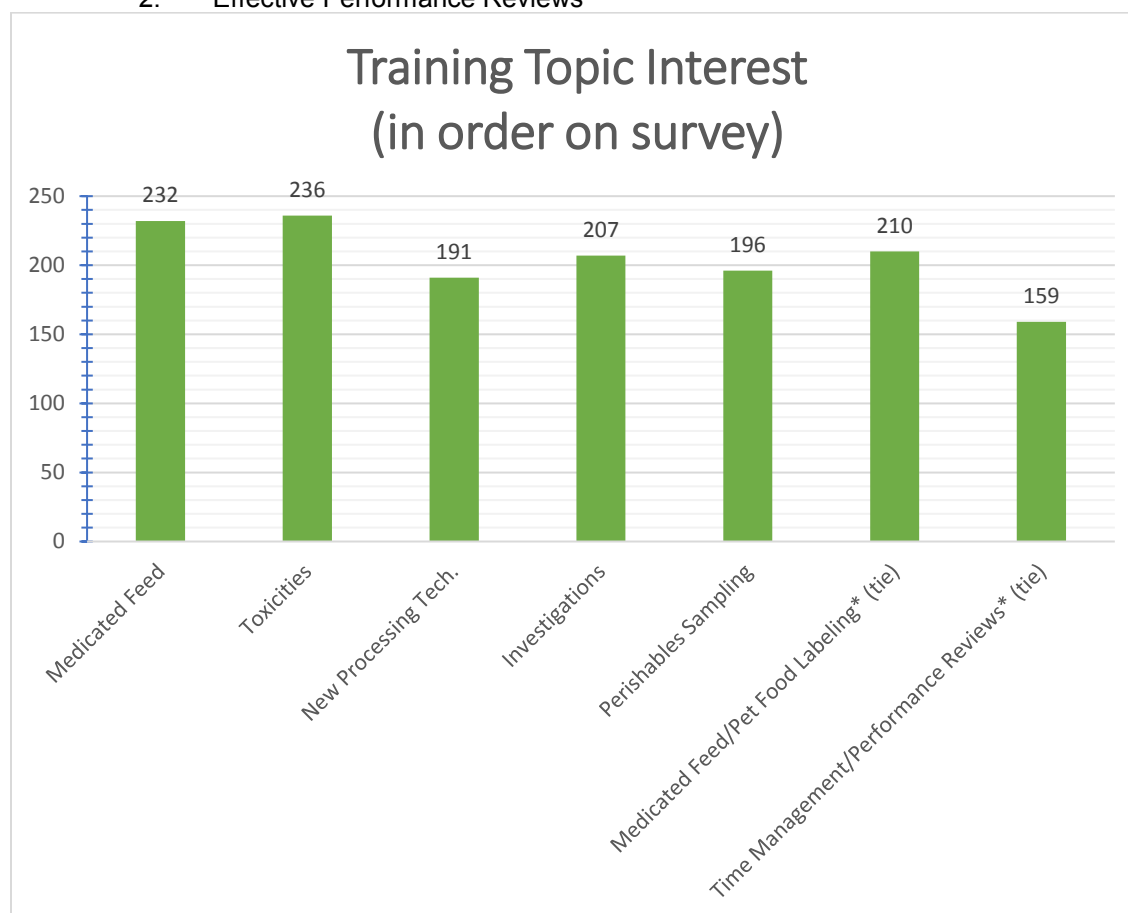
- Total responses: 93
- Total number of states participating: 34
- Subject Area Interest (% Yes):
  - Feed Ingredients (**90.3%**)
  - Animal Nutrition (**78.5%**)
  - Feed Manufacturing (**72%**)
  - Animal & Public Health (**75.3%**)
  - Sampling (**73.1%**)
  - Labeling (**80.6%**)
  - Leadership & Management (**65.6%**)



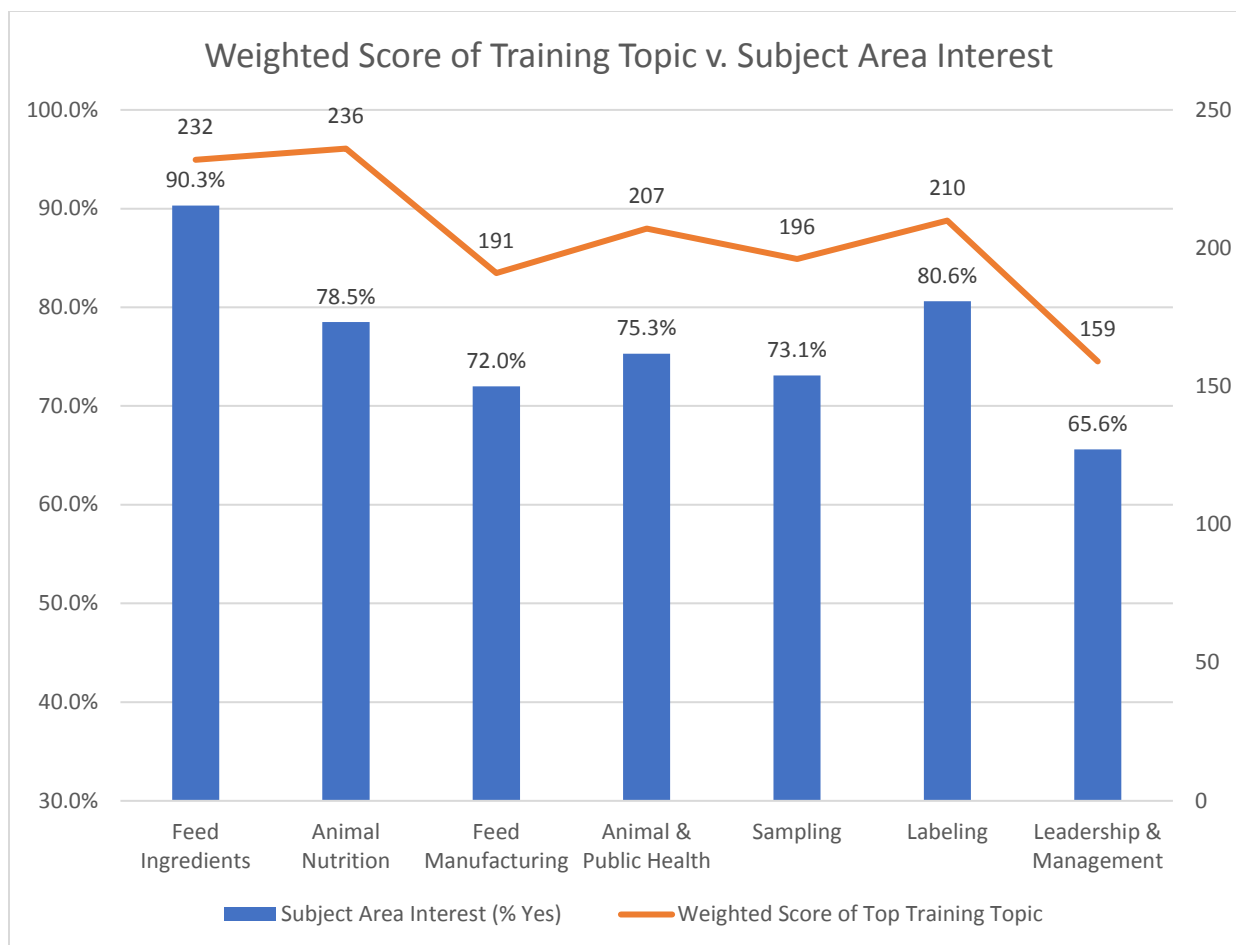
- Ranks:
  1. Feed Ingredients (**90.3%**)
  2. Labeling (**80.6%**)
  3. Animal Nutrition (**78.5%**)
  4. Animal & Public Health (**75.3%**)
  5. Sampling (**73.1%**)
  6. Feed Manufacturing (**72%**)
  7. Leadership & Management (**65.6%**)
- Feed Ingredients was the most popular subject area but may have been due to its placement in the survey (question 1).
- Leadership & Management was least popular.
- Top Training Topic for Each Subject Area (\*denotes a tie):
  - Feed Ingredients (**90.3%**)
    1. Medicated Feed
  - Animal Nutrition (**78.5%**)



- 1. Nutritional Toxicities
- Feed Manufacturing (**72%**)
  - 1. Medicated Feed
- Animal & Public Health (**75.3%**)
  - 1. Investigations
- Sampling (**73.1%**)
  - 1. Perishables (refrigerated/raw) sampling
- Labeling (**80.6%**)
  - 1. \*Medicated Feed (e.g., directions for use, calculations)
  - 2. \*Pet Food Labels
- Leadership & Management (**65.6%**)
  - 1. \*Time & Project Management
  - 2. \*Effective Performance Reviews



- Overall Ranked Training Topic Interest (weighted score):
  1. Nutritional Toxicities (236) – Animal Nutrition
  2. Medicated Feed (232) – Feed Ingredients
  3. Medicated Feed (e.g., directions for use, calculations) (210\*) – Labeling
  4. Pet Food Labels (210\*) – Labeling
  5. Investigations (207) – Animal & Public Health
  6. Perishables (refrigerated/raw) sampling (196) – Sampling
  7. New Processing Techniques (191) – Feed Ingredients
  8. Time & Project Management (159\*) – Leadership & Management
  9. Effective Performance Reviews (159\*) – Leadership & Management



- **Training Preferences**
  - Preferred Training Methods (Top 3):
    1. Web-based/Online modules (at participant's convenience) – **72.8%**
    2. Workshop-Style Event (entire day) – **64.1%**
    3. Instructor-Led/Classroom – **58.7%**
  - Training Obstacles (Top 3):
    1. Travel required – **33.7%**
    2. Lack of time – **29.2%**
    3. Cost of training – **19.1%**
- **Current Training Availability:**

Training Topics	Wt. Score	AAFCO Training Available	
		Yes	No
Nutritional Toxicities	236		N
Medicated Feed	232	Y	
Medicated Feed Labels (e.g., directions for use, calculations)	210	Y	
Pet Food Labels	210	Y	
Investigations	207	Y	N
Perishables (refrigerated/raw) Sampling	196		N
New Processing Techniques	191		N
Time & Project Management	159		N
Effective Performance Reviews	159		N

- **Overall Conclusions:**
  1. Based on the training available currently to AAFCO members, it appears there are some deficits that the states have identified (reference chart above).

2. It is also apparent that some of AAFCO's labeling workshops (medicated feed, pet food) are popular and still relevant. It appears that there would be enough interest to host these workshops again.
3. The top preferred training methods align well with what AAFCO currently offers for its training.
4. The top three training obstacles are travel, time, and cost.
  - Alternative solutions? – web-based/online modules (#1 preferred training method) that don't require travel (reduce time/cost)

#### **ADDITIONAL TRAINING TOPICS SUGGESTED:**

- FSMA
- VFD (medicated feed)
- Nutrient Availability Variables
- Hemp
- VFDs, 507 GMPs, PC rule,
- Liquid feed (sampling)
- DFMs
- AAFCO sponsored training for Feed Labs
- Aquaculture
- Molasses processed feed
- Packaging and transport
- Antibiotic alternatives
- Enzyme labels
- Digestive physiology, feed-through animal drugs
- Statistics/allowances for ingredients

<b>Training Topics</b>	<b>Wt. Score</b>	<b>Subject Area</b>
<b>Nutritional Toxicities</b>	<b>236</b>	<b>Animal Nutrition</b>
<b>Medicated Feed</b>	<b>232</b>	<b>Feed Ingredients</b>
New By-Products	229	Feed Ingredients
Additives (e.g., CFR regs, selenium)	223	Feed Ingredients
Nutritional Deficiencies	211	Animal Nutrition
<b>Pet Food</b>	<b>*210</b>	<b>Labeling</b>
<b>Medicated Feed (e.g., directions for use, calculations)</b>	<b>*210</b>	<b>Labeling</b>
<b>Investigations</b>	<b>207</b>	<b>Animal &amp; Public Health</b>
TB/TF	198	Animal & Public Health
Guaranteed Analysis	198	Labeling
<b>Perishables Samplings (refrigerated, raw)</b>	<b>196</b>	<b>Sampling</b>
DFM	196	Labeling
Microbiological Pathogens	195	Animal & Public Health
Caution/Warning Statements	193	Labeling
Refuge Regulations	192	Feed Ingredients
Micronutrients/Trace Minerals	191	Animal Nutrition
<b>New Processing Techniques</b>	<b>191</b>	<b>Feed Manufacturing</b>
Recalls	190	Animal & Public Health
DFM	189	Animal Nutrition
Pelleting, Extrusion, Distillation of Ethanol (DDGS)	188	Feed Manufacturing
Thermal Processing	182	Feed Manufacturing
Aseptic Sampling	182	Sampling
Rendering	181	Feed Manufacturing
Salvaging	179	Feed Manufacturing
Biosecurity	177	Animal & Public Health
Environmental Sampling	171	Sampling

<b>Training Topics</b>	<b>Wt. Score</b>	<b>Subject Area</b>
RRT	163	Animal & Public Health
<b>Perf. Reviews</b>	<b>*159</b>	<b>Leadership &amp; Management</b>
<b>Time Management</b>	<b>*159</b>	<b>Leadership &amp; Management</b>
Coaching	152	Leadership & Management
Leadership Basics	148	Leadership & Management
Supervision Basics	146	Leadership & Management

## **Feed and Feed Ingredient Manufacturing Committee Report**

2019 AAFCO Annual Meeting  
August 7, 8:00–9:00 am, Louisville, Kentucky

**Committee Recommendations:** None

**Board Recommendations:** Report accepted on October 17, 2019

**Association Recommendations:** None

### **Committee Action Items**

- 1) Mineral Guidelines Working Group: Revise the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients”.
- 2) FSMA Implementation Task Force – Working Group 3  
Create action plan to determine the processes of implementing the decision making and method development.
- 3) 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.
- 4) Committee Charge Workgroup – Review and assess the charge of the Feed and Feed Ingredient Manufacturing Committee

### **Committee Participants**

**Members Present:** Austin Therrell – SC (Co-Chair); Eric Brady – TN (Co-Chair); Bob Church – MT; Ken Bowers – KS; Bob Geiger – IN; Shaness Thomas - FL; Ali Kashani – WA; Doug Lueders – MN; Laura Scott – CFIA; Jamey Johnson – AR; Wayne Nelson – CT; Ben Jones – TX; Shaness Thomas – FL; Sue Hayes – AAFCO

Via Telephone: None

**Advisors Present:** Pat Tovey – PFI; David Meeker – National Renderers Association; Louise Calderwood – AFIA; Dan Frank – AFIA; David Dzanis – APPA; David Fairfield – NGFA; James Emerson – US Poultry; Matt Fredericking – NGFA; Kim Spinelli – JM Smucker; Dan Danielson – FDA; Darlene Kreiger - FDA

### **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**

**\*Modified Agenda noted.**

**Canadian Food Inspection Agency Update - Laura Scott**

**Review of Action Items**

**Mineral Guidelines Working Group – Dave Edwards**

*[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.]*

Above is continuation of discussion from Annual Meeting.

### **FSMA IMPLEMENTATION TASK FORCE UPDATES**

**Working Group #3 – Contaminant and Hazard Lab Strategy - Brady**

*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*

LMSC now has new chairs in Dr. Sharon Webb and Christie McCallum. There has been improved communication at the meeting. We expect to have progress made throughout the meeting. Work Group will be retooled and sharpened with increased coordination with LMSC. Hazard list will be reviewed and assistance will be provided as necessary. Eric Brady to take the lead on work group.

**Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections - Brady**

*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*

Coordination with Miriam Johnson – Inspection and Sampling – Eric Brady volunteered to join the standardized AITS cadre for Feed and Feed Manufacturing training, in Alabama. Intent was to flash test the new curriculum for inspector needs. The first standardized AITS was completed in June in Montgomery, Alabama with excellent feedback. Further coordination with Miriam Johnson should improve ingredient manufacturing training for inspectors.

**Other Business:**

**Review Charge of committee-**

Workgroup to provide further guidance at midyear meeting.

**Ingredient Traceback-**

Ingredient verification tool provided excellent talking points during the meeting. Industry was interested in providing assistance with usage of tool.

Tennessee, Missouri, Montana, Kansas and South Carolina will use tool in field to improve usability for other interested states.

**Chapter Edits**

Darlene Kreiger provided update on Chapter Edits.

Austin/Eric

Motion to adjourn

Bob Church makes motion to adjourn and Bob Geiger seconds the motion

9:05 am – Meeting Adjourned

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	Tentative: January 2020
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 2020
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 2020

**Feed Labeling Committee Report**  
2019 AAFCO Annual Meeting  
August 6, 1:30–2:30 pm, Louisville, Kentucky

**Committee Recommendations:** None

**Board Recommendations:** Report accepted on October 17, 2019

**Association Recommendations:** None

**Committee Participants**

**Members Present:** David Dressler (PA), Dave Phillips (ND), Liz Beckman (WA), Caitlin Price (NC), Mika Alewynse (FDA), Richard Ten Eyck (OR), Heather Bartley (WI), Steve Gramlich (NE).

**Advisors Present:** Emily Helmes (ETA), Angela Mills (AFIA), Meghan Dicks (AFIA), Pat Tovey (PFI), Jan Campbell (NGFA), Dave Dzanis (ACVN/APPA), Chris Olinger (NGFA), James Emerson (USPA).

**Others Present:** Ken Gilmurray (NRA)

**Absent:** Erin Bubb (PA), Tim Darden (NM), George Ferguson (NC), Stevie Glaspie (MI), Jason Schmidt (LA).

**Introductions and Agenda Review**

David Dressler called the meeting to order at 1:30 PM EDT. Roll call of members and advisors was taken and a quorum was established (8 out of 13).

**Genetically Modified Organisms**

Agenda item asked if there should be labeling requirements and definitions for GE, GMO or non-GMO in the OP. Discussion went through the lack of Federal requirements for animal food (only USDA requirements for human food), and that an AAFCO requirement would be inconsistent with and preempted by Federal law. There is a guidance available from FDA, and emphasis was placed on the guidance as being the point reference for all states and industry in relation to GMO, GE, and Non-GMO labels. The group decided to move forward with reference to the FDA document, "Guidance for Industry: Voluntary Labeling Indicating Whether Foods Have or Have Not Been Derived from Genetically Engineered Plants."

**Maximum Levels for Nutrients with Toxicity Levels**

There is misunderstanding with the charge of the workgroup. Industry expressed concerns about establishing maximums without an expert panel. Workgroup previously assembled includes Richard Ten Eyck, Dave Dzanis, Erin Bubb, Al Harrison, and Jan Campbell. FDA volunteered to participate in the workgroup. AFIA would like to be added to the workgroup. Al Harrison asked to be removed from the group, but offered to assist as a subject matter expert for purposes of reference materials. The workgroup is now charged to decide if an expert panel is needed to determine if any maximum label guarantees are needed according to those elements listed in Table 2 on page 299 of the 2019 OP.

**Blue Bird Labels for Human By-Products**

A regulator emailed the chair and requested some blue bird labels (sample labels like those already published in the OP) for development of labels. Tabled to midyear when the chair can request more information from the person that submitted the request.

**Vitamin D<sub>3</sub> for Rabbits**

Chair will distribute background for the topic in advance of the 2020 midyear meeting.

**Responsible Labeling for Direct-Fed Microbials**

Mika Alewynse presented on responsible labeling for direct-fed microbial products. Discussion included use directions, storage and handling instructions, "use by" dates.

**Livestock Treats Work Group**

Livestock treats workgroup recommends required guarantees for treats (all species and classes) as long as the product is labeled as a treat on the principal display panel

- a. Minimum percentage of Crude Protein
- b. Minimum percentage of Crude Fat
- c. Maximum percentage of Crude Fiber
- d. Other guarantees, as needed to support nutrient content claims in the labeling as per Model Bill 5(a)(3), and in accordance with terminology, order of guarantees and units of expression as specified in Model Regulations 3(a)(4) and 4.

The workgroup recommends this to go back to the committee for review. The document from the workgroup will be sent to David Dressler to send to the committee for review.

**Feed Labeling Workshop**

The FLC has been requested to have a workshop at 2020 Midyear. Chair will reach out to people to form a workgroup to assemble topics and activities for the workshop.

**Strategic Affairs Commitments**

This topic was not discussed due to time constraints.

**Meeting adjourned at 2:34 PM EDT**



## **Feed Labeling Committee Special Meeting Minutes**

September 19, 2019, 1:00–2:00 pm, Conference Call

**Committee Recommendations:** None

**Board Recommendations:** Report accepted on October 17, 2019

**Association Recommendations:** None

### **Committee Participants**

**Members Present:** David Dressler (PA), Heather Bartley (WI), Erin Bubb (PA), Lizette Beckman (WA), Jason Schmidt (LA), Caitlin Price (NC), Mika Alewynse (FDA), Richard Ten Eyck (OR).

**Advisors Present:** Dave Dzanis (ACVN/APPA), Meagan Dicks (AFIA), Jan Campbell (NGFA), Chris Olinger (NGFA), Ken Gilmurray (NGFA) (joined late).

**Others Present:** Tom Phillips (MD), Leah Wilkinson, Dave Fairfield, Wenjuan Jobgen (Eurofins), and Elaine Joygen. Lori Chavez (PFI) is filling in for Pat Tovey.

**Absent:** Tim Darden (NM), George Ferguson (NC), Stevie Glaspie (MI), Karissa McCaw (FL), Angela Mills (AFIA), James Emerson (USPA), Julia Fidenzio (APPA), Emily Helmes (ETA), Pat Tovey (PFI), and Chelsea Kent.

### **Introductions and Agenda Review**

David Dressler called the meeting to order at 1:03 PM EDT. Roll call of members and advisors was taken and a quorum was established (8 out of 12).

Agenda change: Vitamin D Guarantee for Rabbit Complete Feeds and Supplements was moved to the end of the agenda to allow for more time for discussion

### **Committee Members and Advisor Changes**

The following members have requested to be removed from the committee: Dave Phillips (ND), Steve Gramlich (NE) and Al Harrison (KY). Since Dave Phillips has left the committee, Heather Bartley (WI) has been appointed the new vice-chair.

Karissa McCaw (FL) has joined the committee as a new member. Chelsea Kent and Ken Gilmurray have joined as advisors.

### **Topic Submissions to the Feed Labeling Committee**

Suggested process: Going forward, any topic for future committee meetings must be submitted prior to the meeting in writing to chair and vice-chair. The person suggesting topic, or designate, shall be present during the meeting to explain the background and facilitate the discussion.

### **Labeling Workshop**

Education and Training Committee has requested a feed labeling workshop to take place just before the AAFCO mid-year meeting on Monday, January 20, 2020. FDA is willing to organize and prepare all material for the entire 1-day workshop. The workshop will be a medicated feed labeling workshop.

MOTION: Erin Bubb moves to hold a medicated feed labeling workshop on January 20, 2020. Richard seconds. MOTION PASSES.

### **Vitamin D Guarantees for Rabbit Complete Feeds and Supplements**

The Feed Labeling Committee received a request from Oregon Department of Agriculture and Washington State Department of Agriculture to make a request to Model Bills Committee to require maximum guarantees for complete feeds and supplements for rabbits. MOTION: Richard Ten Eyck moves to insert "(9) Maximum Vitamin D3, in IU per pound into Regulation 3(a)(4)(X)(b) of the AAFCO model regulations so that it reads: Regulation 3 (a)(4)(X)(b)(9) Maximum Vitamin D3, in IU per pound." Erin Bubb Seconds.

Discussion included background of the topic, laboratory challenges to running vitamin D, and the NRC for Rabbits (1977, 2nd revised edition) advisory level for toxicity of vitamin D in rabbits at 23,000 IU/kg.

A roll call vote was taken.

Ayes: Richard Ten Eyck, Liz Beckman, and Erin Bubb

Nays: Heather Bartley, Caitlin Price, Jason Schmidt, and Dave Dressler.

Abstain: Mika Alewynse.

MOTION FAILS.

**Meeting adjourned at 1:56 PM EDT**

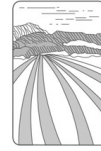


Oregon

Kate Brown, Governor

Department of Agriculture

635 Capitol St NE  
Salem, OR 97301-2532



May 23, 2019

Dave Dressler, Chair, Feed Labeling Committee  
Association of American Feed Control Officials  
Via email: [davdressle@pa.gov](mailto:davdressle@pa.gov)

Re: Vitamin D3 labeling on all rabbit

Feeds Hi Dave,

As members of the Association of American Feed Control Officials (AAFCO), Oregon and Washington State Departments of Agriculture, would like to request the Feed Labeling Committee make a recommendation to the Model Bill and Regulations committee to concur with placement and language and pass to BOD and Association Membership the following amendment to the AAFCO model regulations:

insert **“(9) Maximum Vitamin D3, In IU per pound.”** Into regulation 3(a)(4)(X)(b) of the AAFCO model regulations. So that it reads:  
Regulation 3. (a)(4) (X) (b) **(9) Maximum Vitamin D3, In IU per pound.**

Since this addresses a feed safety concern, we would request the Committee to use exception I (d) listed in the 2019 Official Publication Rev. 1 on page 138 and act promptly.

Links to the relevant recalls of rabbit feed with toxic levels of vitamin D are listed below:

<https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts/grange-co-op-recalls-rogue-all-purpose-rabbit-pellets-high-vitamin-d-health-risk>

<https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts/intermountain-farmers-association-issues-recall-rabbit-feed-high-vitamin-d-content>

The two incidents in the RFR list continued undetected for at least 6 months and caused a severe impact to the rabbit production industry. Had the animal feed industry been required to guarantee a Vitamin D3 level, there would have been reasons for testing and monitoring of the nutrient when regulators collected samples, resulting in an earlier detection.

*“Rabbits consuming this feed would be at risk for developing clinical hypercalcemia when fed diets containing very high levels of vitamin D, as a sole source of nutrition. Clinical signs of hypercalcemia include such things as increased thirst, increased urination, weakness, decreased appetite and possibly death.”*

We appreciate the Committee’s attention to the resolution of the above issue and will make proposals to amend our respective rules at the state level.

---

Richard Ten Eyck  
Feed Safety Specialist  
Oregon Department of  
Agriculture  
[rteneyck@oda.state.or.us](mailto:rteneyck@oda.state.or.us)

---

Ali Kashani, Ph.D.  
Animal Feed Program Manager  
Food Safety & Consumer Services Division  
Washington State Department of Agriculture  
[akashani@agr.wa.gov](mailto:akashani@agr.wa.gov)

## Ingredient Definitions Committee Report

2019 AAFCO Annual Meeting  
August 6, 3:00–5:30 pm, Louisville, Kentucky

### Committee Recommendations

*When needed, new text is presented in the committee minutes, Appendix 1.*

- 1) Publish the **New Feed Term “Bison”**, includes language to allow “North American buffalo”.  
Required Roll Call Vote: AYE 14 , NAYS 6, Abstain 2, MOTION PASSED
- 2) Revise the **Feed Term “Carrier”**.
- 3) Revise the **Feed Term “\_\_\_\_\_ Stabilized”** .
- 4) Publish **New Feed Term “Treat”**.
- 5) Publish the **New Feed Term “Water Buffalo”**. Required Roll Call Vote: AYE 17, NAYS 4, Abstain 1, MOTION PASSED
- 6) Move to Official w/minor edits - **T33.25 Stearic Acid**
- 7) Move to Official w/minor edits - **T33.26 Palmitic Acid**
- 8) Move to Official – **T69.8 Oat Fiber**
- 9) Move to Official **T73.311(A) Hydrogenated Glycerides**
- 10) Move to Official **T73.401 Colored Graphite Tracer**
- 11) Move to Official **T73.450 Cashew Nut Shell Liquid**
- 12) Move to Official **T87.50 Cashew Nut Shell Extract**
- 13) Edit Table 101 to add: **Dried *Methylobacterium extorquens* biomass** AGRN 26

### Board Recommendations:

Report accepted on October 17, 2019

Board accepted recommendations 1-13

### Association Recommendations:

To be considered Midyear 2020 meeting.

#### Committee Actions Not Requiring Association Votes

- a) Continue investigation/discussion of Table 90.26 to add **Vitamin** common names for dog and cat finished foods.
- b) Correction to **36.14 Direct Fed Microbial list - *Pediococcus cerevisiae* (damnosus)**  
Editorial Change *Pediococcus cerevisiae* (damnosus) new text to follow “, renamed to *Pediococcus damnosus* \*\*\*”  
Text to be placed at the end of the definition  
\*\*\* date of compliance January 2023
- c) Editorial change to **84.71 Soybean Meal**, add back in the fiber guarantee.
- d) Agreed to leave **57.167 Manganese Hydroxychloride** as Tentative, allow for more time in the publication.
- e) Decision to maintain Non-Defined Working Group.
- f) Decision to maintain GRAS Verification Working Group.
- g) Next Meeting: Thursday, September 26, 2019 11:30AM Eastern via Webinar
- h) Not discussed in meeting: IDC & CVM will host a workshop on GRAS notices on 8/5/2020 in Baltimore, Prior to the AAFCO annual meeting. (needs BOD approval yet)
- i) Not discussed in meeting: IDC & CVM will host a training for AAFCO Ingredient Investigators on 8/4/2020 in Baltimore. (needs BOD approval yet)

### Meeting Minutes

#### Topics moved to the next meeting:

- i. None
- 1) Roll call of Committee Members Present including five online\*:  
Richard Ten Eyck, Kristen Green, Mika Alewynse, Erin Bubb, David Beard, Brett Boswell, Ken Bowers, Bob Church, Stan Cook, Dave Dressler, James Embry, \*Maggie Faba, \*George Ferguson, Jacob Fleig, Steve Gramlich, Brett Groves, Ali Kashani, \*Dan King, Mark LeBlanc, \*Melanie

Marquez, Dave Phillips, \*Nathan Price, Laura Scott, Shannon Jordre, Charlotte Conway, Kent Kitade, Jennifer Kormos,  
Absent: Michelle Boyd, Tom Phillips

A quorum was present (22/24 voting members). The meeting was recorded.

There were 45 people logged into the webinar including the committee members.

- 2) Addition of new Table 90.26 to add **Vitamin** common names for dog and cat finished foods – Tom Phillips (15 min); document is in the BIN
  - a) Discussion opened w/o motion or second – Objections made regarding the use and content of the table. Some technical names appeared incorrect.
  - b) Motion: NONE, will leave with Investigator to develop further and report back at next IDC meeting.
- 3) 54.33 and 54.34 Editorial Addition of note on **Colostrum** Products. – Kent Kitade (5 min) **Proposed wording of footnote:**  
*\*\* A colostrum product labeled for treating “failure of passive transfer (FPT)” in newborn calves is not a feed ingredient but a USDA regulated veterinarian biologic, legally distributed under a US veterinary license or permit pursuant to 9CFR 113.499. Product labeling for the treatment of FPT must include the US veterinary license or permit number and product code per 9CFR 112.2. Labeling guidelines for the colostrum veterinarian biologic product can be found in USDA Veterinary Services Memorandum No. 800.54.*  
Kent Kitade proposed change to the language, as highlighted above.  
Motion: Brett Groves, 2<sup>nd</sup> Mark LeBlanc  
Extensive discussion on the purpose of the footnote since the intended use of the product, as described, is not a feed ingredient.  
Vote: Editorial addition w/removal of feed ingredient reference – MOTION FAILED
- 4) Editorial change to a 36.14 Direct Fed Microbial list *Pediococcus cerevisiae (damnosus)* -Maggie Faba (5 min) *Pediococcus cerevisiae (damnosus)* new text to follow “, renamed to *Pediococcus damnosus* \*\*\*”  
Text to be placed at the end of the definition  
\*\*\* date of compliance January 2023
  - a) Taxonomic changes created discrepancies in the OP and market labeling. Editorial change.
  - b) Motion: Ken Bowers/2<sup>nd</sup> Brett Groves
  - c) Disc/Questions: none
  - d) Vote: MOTION PASSED
- 5) Editorial change to 84.71 Soybean Meal, add back in the fiber guarantee – Bob Church (5 min)
  - a) Motion: Bob Church/2<sup>nd</sup> Stan Cook
  - b) Editorial Change
  - c) Discussion – the fiber guarantee is included in other definitions, looks like it was left out of the definition in error as it was originally stated in the CVM letter to the investigator but did not make the definition in the OP.
  - d) Questions: none
  - e) Vote: MOTION PASSED
- 6) Move Tentative Definitions to Official (25 min)
  - a) 33.25 Stearic Acid – move to Official -Brett Boswell  
- minor edits as listed  
Motion: Brett Boswell/2<sup>nd</sup> Brett Groves  
Vote: MOTION PASSED
  - b) 33.26 Palmitic Acid - move to Official -Brett Biswell  
- minor edits as listed  
Motion: Brett Boswell/Mark LeBlanc  
Vote: MOTION PASSED
  - c) 57.167 Manganese Hydroxychloride – Stays Tentative – Jennifer Kormos  
- this ingredient has not been in the book very long, so will stay tentative.  
Motion: none
  - d) 69.8 Oat Fiber - move to Official – Motion: Steve Gramlich/2<sup>nd</sup> Brett Groves. Extensive Discussion on the narrow scope of the definition as favoring one company, however, an amendment which will remedy this situation has been submitted and is pending review/approval by FDA.

- Vote: MOTION PASSED
- e) 73.311(A) Hydrogenated Glycerides – move to Official – Richard Ten Eyck  
 Motion: Brett Groves/2<sup>nd</sup> Ken Bowers  
 Disc: – this tentative definition is not in the print version OP, need to refer to online OP for correct tentative.  
 Vote: MOTION PASSED
- f) 73.401 Colored Graphite Tracer – move to Official – Richard Ten Eyck  
 Motion: Brett Groves/2<sup>nd</sup> Ken Bowers  
 Disc: none  
 Vote: MOTION PASSED
- g) 73.450 Cashew Nut Shell Liquid – move to Official – Richard Ten Eyck  
 Motion: Brett Groves/2<sup>nd</sup> Ken Bowers  
 Disc: none  
 Vote: MOTION PASSED
- h) 87.50 Cashew Nut Shell Extract – move to Official – Richard Ten Eyck  
 Motion: Jacob Fleig/2<sup>nd</sup> Brett Groves  
 Disc: none  
 Vote: MOTION PASSED
- 7) New feed term Bison – Brett Boswell (10 min)  
 a) Brett – adds language to allow “North American buffalo” used interchangeably with bison.  
 b) Motion: Dave Beard/2<sup>nd</sup> Bob Church  
 c) Discussion: “Buffalo” as a standalone name will no longer be allowed.  
 d) Vote: Publish as displayed, MOTION PASSED  
 e) Roll Call: AYE 14 , NAYS 6, Abstain 2
- 8) New feed term Water Buffalo -Brett Boswell (20 min)  
 a) Brett – Two versions are in the BIN, latest dated 6/1/19.  
 b) Motion: Bob Church/2<sup>nd</sup> Mark LeBlanc  
 c) Discussion – This species is the predominant type being imported at this time.  
 d) Audience comments: Natl Bison Association - support this definition, encourage to adopt both recommendations.  
 e) Vote: Publish as displayed on screen, MOTION PASSED  
 f) Roll Call: AYE 17 , NAYS 4, Abstain 1
- 9) New feed term “treat” – Ali Kashani (5 min) **“Treat: a food provided occasionally for enjoyment, training, entertainment, or other purposes, and not generally intended or represented to be a complete feed or supplement.”**  
 a) Motion: Ali/2<sup>nd</sup> Jacob Fleig  
 b) Disc: no previous definition, just looking for clarification. Consensus between pet and livestock treats. The phrase “generally not intended” allows for flexibility in feeding.  
 c) Vote: MOTION PASSED
- 10) Revise Feed Term “carrier” – Ali Kashani (5 Min) **“Carriers – Materials suitable for use in animal food to which ingredients such as but not limited to vitamins and minerals are added to facilitate uniform incorporation of the latter into feeds. The active particles are absorbed, impregnated, or coated into or onto the materials in such a way as to physically carry the active ingredient.”**  
 a) Ali – as displayed on screen is a revised definition. The language noted here is a revised since presented at last webinar in July 2019.  
 b) Motion: Ali Kashani/2<sup>nd</sup> Brett Groves  
 c) Extensive discussion on “diluent” versus “carrier”. FDA recommends staying with the new definition of carriers that is technically correct. There doesn’t appear to be a conflict with the use of the term “carrier” in other definitions.  
 d) Amendment to the motion? None made  
 e) Vote: MOTION PASSED
- 11) Revise Feed Term “\_\_\_\_\_ Stabilized” – Ali Kashani (5 min) **“Stabilized (Process) – When an ingredient which may deteriorate has been processed to improve stability, the expression “stabilized”, “stability improved” or “with improved stability” may appear following the ingredient in the statement of ingredients. The process used is to be specified. e.g. heat stabilized”**  
 a) Ali – language as displayed on screen was proposed for consideration.  
 b) Motion: Ali Kashani/2<sup>nd</sup> Ken Bowers

- c) Discussion: There was some confusion about how to use the other forms of the term, “stability improved” or “with improved stability”. FDA – it refers to a process. Example: OP pg 447, 75.10 Stabilized Rice Bran.
- d) Motion to revise the term as it appears: MOTION PASSED
- 12) Non-Defined workgroup update - Kent Kitade (10 min)
  - a) Kent – follow up to the midyear meeting to establish a list for regulator use only.
  - b) Motion to accept the report: Brett Groves/2<sup>nd</sup> Mark LeBlanc
  - c) Extended discussion on the intent of the list and why it is not public. There are concerns the list has negative connotations, and ETA has requested more transparency and the ability for firms to respond to questions. Per the WG, the list is meant to hold the “history” of an ingredient and to be a reference for regulators seeking clarity on whether it is a common and usual or has some other status. It is not public at the perceived request of industry; the WG is open to making it public. Industry has raised a number of questions that have not been adequately addressed.
  - d) Action: Leave the WG standing and ask them to discuss the concerns expressed.
- 13) Hemp Update (5 min) Bob Church
  - a) No submissions for a definition to date.
  - b) Industry studies are in the works. Comments were offered by Hunter Buffington and Steve McGarrah,
  - c) Discussion: Applications for Hemp Seed Oil for Dogs and Cats and Hemp Seed Meal – for poultry are being compiled for submission. Cold Pressed Hemp Seed Oil – for non-food animals, expect request to AAFCO in next 60 days.
- 14) Limestone workgroup update – Jennifer Kormos (5 min)
  - a) Jennifer Kormos received a submission for precipitated limestone. Working with FDA, application still pending.
- 15) GRAS verification workgroup update - Richard (5 min)
  - a) Goal is established.
  - b) A Verification Process draft document is in the BIN. Section editors have been assigned, looking for additional volunteers from States and Industry.
  - c) Comment - the Board has asked whether the ICG verification process is in alignment with AAFCO’s scope but will allow work to continue on the process. The AAFCO strategic affairs committee will discuss this and make a presentation at the midyear AAFCO meeting.
- 16) Next Meeting: Thursday, September 26, 2019 11:30AM Eastern via Webinar
- 17) **Late addition to agenda item**  
 AGRN **Dried *Methylobacterium extorquens* biomass**, to be used as a source of protein to replace soybean or fish meal in food for finfish species. Received a No Questions Letter from FDA Feb 11, 2019.  
 Motion to edit Table 101: Nathan Price/2<sup>nd</sup> Brett Groves  
 Vote: MOTION PASSED

Meeting Adjourned 5:28PM Thanks to the team that assisted with the meeting. Sandy Tuttle, Kent Kitade, Sue Hays and Jennifer Roland.

Minutes approved 8/28/2019: 14 aye, 0 nay, 0 abstain. The following members did not vote: Mika Alewynse, Dave Dressler, James Embry, Ashlee-Rose Ferguson, Ali Kashani, Mark LeBlanc, Melanie Marquez, Dave Phillips, Tom Phillips

## Appendix 1, IDC meeting 8/6/19

- 1) Publish the **New Feed Term “Bison”**,  
**Bison.** Common name for *Bison bison*. The meat or other ingredients derived from the animal (e.g. by-products, meal, fat) must be referred to as “bison,” “North American buffalo,” “bison \_\_\_\_\_,” or “North American buffalo \_\_\_\_\_” with the specific non-meat ingredient filling in the blank.
- 2) Revise the **Feed Term “Carrier”**.  
**Carriers.** An edible material to which ingredients are added to facilitate uniform incorporation of the latter into feeds. The active substances are absorbed, impregnated or coated into or onto the edible materials in such a way as to physically carry the active ingredient.
- 3) Revise the **Feed Term “\_\_\_\_\_ Stabilized”**  
**Stabilized.** (Process) – When an ingredient which may deteriorate has been processed to improve stability, the expression “stabilized”, “stability improved” or “with improved stability” may appear following the ingredient in the statement of ingredients. The process used is to be specified. e.g. *heat stabilized*
- 4) Publish **New Feed Term “Treat”**.  
**Treat.** a food provided occasionally for enjoyment, training, entertainment, or other purposes, and not generally intended or represented to be a complete feed or supplement.
- 5) Publish the **New Feed Term “Water Buffalo”**.  
**Water Buffalo.** Common name for *Bubalus bubalis*. The meat or other ingredients derived from the animal (e.g. by-products, meal, fat) must be referred to as “water buffalo” or “water buffalo \_\_\_\_\_” with the specific non-meat ingredient filling in the blank.
- 6) Move to Official w/minor edits - **33.25 Stearic Acid**  
**33.25 Stearic Acid** is a waxy solid derived from the hydrolysis of vegetable oils and/or animal fats. It is used as an energy source in growing and adult ruminant diets up to a maximum inclusion of 3% (w/w) in the finished feed. It cannot be used in pre-ruminant animal feed or in milk replacers. The final ingredient is produced by fractional distillation of the hydrolyzed fats and oils. It contains predominantly stearic acid, with lesser amounts of palmitic acid. It must contain, and be guaranteed for, minimum 92% stearic acid, maximum 5% palmitic acid, minimum 99% total free fatty acids, maximum 1% sulfated ash, and maximum 5 ppm lead. Maximum moisture must also be guaranteed. Animal fats and vegetable oils used in the hydrolysis reaction to produce stearic acid must meet the specifications stated in the respective AAFCO definitions, 33.1 (for Animal Fat) and 33.2 (for Vegetable Fat or Oil). If tallow is used, the starting material must comply with the BSE feed regulation under 21 CFR 589.2000 and 589.2001.  
(Proposed 2017 rev 1)
- 7) Move to Official w/minor edits - **33.26 Palmitic Acid**  
**33.26 Palmitic Acid** is a waxy solid derived from the hydrolysis of vegetable oils and/or animal fats. It is used as an energy source in growing and adult ruminant diets up to a maximum inclusion of 2% (w/w) in the finished feed. It cannot be used in pre-ruminant animal feed or in milk replacers. The final ingredient is produced by fractional distillation of the hydrolyzed fats and oils. It contains predominantly palmitic acid, with lesser amounts of myristic acid. It must contain, and be guaranteed for, minimum 98% palmitic acid, maximum 0.8% myristic acid, minimum 99% total free fatty acids, maximum 1% sulfated ash, and maximum 5 ppm lead. Maximum moisture must also be guaranteed. Animal fats and vegetable oils used in the hydrolysis reaction to produce palmitic acid must meet the specifications stated in the respective AAFCO definitions, 33.1 (for Animal Fat) and 33.2 (for Vegetable Fat or Oil). If tallow is used, the starting material must comply with the BSE feed regulation under 21 CFR 589.2000 and 589.2001.  
(Proposed 2017 rev 1)
- 8) Move to Official – **T69.8 Oat Fiber**  
**69.8 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 **as** a source of insoluble fiber in animal feed and pet food.  
(proposed 2019)
- 9) Move to Official **T73.311(A) Hydrogenated Glycerides**  
**73.311 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.” (Proposed 2019 rev. 1)

10) Move to Official **T73.401 Colored Graphite Tracer**

**73.401 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. (Proposed 2019 rev. 1)

11) Move to Official **73.450 Cashew Nut Shell Liquid**

**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)

12) Move to Official **T87.50 Cashew Nut Shell Extract**

**87.50 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)

13) Edit Table 101 to add: Dried *Methylobacterium extorquens* biomass AGRN 26

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)
26 <a href="#">Part 1</a> (PDF - 385 pages) <a href="#">Part 2</a> (PDF - 190 pages) <a href="#">Part 3</a> (PDF - 191 pages)	KnipBio, Inc.	Dried Methylo- bacterium extorquens biomass	Dried Methylo- bacterium extorquens biomass	To be used as a source of protein to replace soybean or fish meal in food for finfish species at a level up to 10% of the diet	Finfish species	2/7/18	<a href="#">FDA has no questions.</a> (PDF - 5 pages)

## Ingredient Definitions Committee 9/26/2019 Webinar

### Committee Recommendations

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

- 1) IDC recommends the BOD replace consideration of version 13 of **A Guide to Submitting New or Modified Ingredient Definitions to AAFCO** with version 15.4 (Appendix 2) and provide their recommendation to the membership. *Underlined text indicates differences between the two versions.* IDC Recommendation is to strike current language in 2019 OP on page 335 to 339 and insert the language in version 15.4.
- 2) Publish the new feed term "Snack". **"Snack: See treat"**
- 3) **Publish as tentative the new ingredient definition: T73.430 L-Lactic acid** is a sequestrant with a minimum content of 97% L-lactic acid and a maximum of 0.5% D-isomer for use in dry cat food products (less than 20% moisture). It is intended for use as a dental plaque and tartar control agent for adult maintenance cat food at levels not to exceed 1.2% on a dry matter basis.
- 4) Publish two additions to table 101. **Phytase, AGRN 27 & Clinoptilolite of sedimentary origin, AGRN 29**

### Board Recommendations:

Report accepted on October 17, 2019

Board accepted recommendations 1-4

### Association Recommendations:

To be considered Midyear 2020 meeting.

**Committee Actions Not Requiring Association Votes:** N/A

### Meeting Minutes

Topics moved to the next meeting:

- i. None

- 1) Roll call of Committee Members Present:  
Richard Ten Eyck, Erin Bubb, Kristen Green, Mika Alewynse, David Beard, Brett Boswell, Ken Bowers (via proxy), Dave Dressler, James Embry, Maggie Faba, Ashlee-Rose Ferguson, George Ferguson, Jacob Fleig, Brett Groves, Darrell Johnson (via proxy), Ali Kashani, Dan King, Mark LeBlanc, Melanie Marquez, Dave Phillips, Nathan Price, Laura Scott, Charlotte Conway, Kent Kitade, Jennifer Kormos,  
Absent: Stan Cook, Tom Phillips,

A quorum was present (22/24 voting members). The meeting was recorded.

*There were 133 people logged into the webinar including the committee members.*

Documents supporting the agenda are posted in the BIN library / Ingredient Definitions / Investigator Recommendations -or- contact the person listed on the agenda with questions. Please direct definition process questions to [definitions@aaafco.org](mailto:definitions@aaafco.org).

- 2) Guidelines for Requesting a Definition, Workgroup Report -- Richard
  - a) Accept report in BIN <https://aaafco.mocaworks.com/viewasset/?eID=1724402> Dave Dressler so moves / Jacob Fleig 2<sup>nd</sup> Committee Accepted report
  - b) Discussion Recommendations in version 15 of **A Guide to Submitting New or Modified Ingredient Definitions to AAFCO** --. Main changes were (a) Modified language on page 7 so that shortest timeline for an ingredient to go from Tentative to Official would be about 1 year.  
(b) Inclusion of Color Additives language.
  - c) Disposition of Version 13  
*Erin Bubb moved to have the BOD replace consideration of version 13 with version 15.4 and to publish version 15.4 in the OP. Brett Groves, seconds.* Procedurally the version 13 is still in front of the BOD. Ken Bowers, Chair of the by Laws subcommittee concurred it was proper to replace the versions in order to allow the document to move forward to membership. Motion passes without objections.
  - d) *Chairman note: Workgroup is disbanded.*

- 3) GRAS Notice Training Workshop 8/5/2020- establish workgroup-- Richard Charge: Develop and deliver a public workshop on submitting GRAS notifications to FDA on feed ingredients.
  - a) Lead – Dave Edwards
  - b) Team: (CVM), Nathan Price, Louise Calderwood (AFIA), Kristi Smedley, Chris Cowell (PFI), Emily Helmes (ETA), Jan Campbell (NGFA), Meagan Davis
  - c) ETC Liaison: George Ferguson, NC
  - d) Comments: Please cover Information clarifying GRAS status vs. FSMA/GMP manufacturing requirements it would be helpful to industry
- 4) AAFCO Investigator Training - Baltimore 8/4/2020 ( establish workgroup) ----Richard Charge: Using materials from the last investigator workshop develop and deliver regulator-only training for the AAFCO ingredient investigators.
  - a) Lead – Charlotte Conway
  - b) Team – Richard Ten Eyck, (CVM), (Investigators), Kent Kitade, Ali Kashani
  - c) ETC Liaison: Kate Nelson, CT
  - d) Comments: Also consider subject matter training for new AAFCO investigators, for example once a new AAFCO investigator has been identified for enzymes.
- 5) New Feed Term "**Snack**"—Snack: "See treat". Ali Jacob moves to publish the term "snack"; Dave Dressler seconds. PASSED without objections.
- 6) New Feed Term **Common or Usual** -- Ali Charlotte relayed that Work Group continues to work this Term. They are working on both Common Food and Common or Usual(naming process). They need to ensure no unintended consequences. A search of the OP found use of these terms in Model Bill and Regulations which would have impacts on state feed laws. The work group will have complete report in January 2020. Add Chris Cowell (PFI) to the workgroup.
- 7) New Feed Term **Common Food** -- Ali See above.
- 8) **T73.430 L-Lactic acid** is a sequestrant with a minimum content of 97% L-lactic acid and a maximum of 0.5% D-isomer for use in dry cat food products (less than 20% moisture). It is intended for use as a dental plaque and tartar control agent for adult maintenance cat food at levels not to exceed 1.2% on a dry matter basis. Richard T. – 5 Min. Brett Groves moved to publish as tentative; Mark LeBlanc seconded. Motion passes without objection.
- 9) Table 101 GRAS Notification AGRN 27 (placeholder)— Nathan Price explained the recent publication of this AGRN and moved to accept the addition of this ingredient to Table 101 in the OP; Jacob Fleig seconded. Motion Passes without objection.
- 10) **Late add during meeting** Table 101 GRAS Notification **AGRN 29** – Nathan Price moved to accept the addition of this ingredient to Table 101 in the OP; Jacob Fleig seconded. Motion passes without objection.  
 comments: Nathan does not move ahead with the AGRN updated listing to the IDC until the redacted copy of the AGRN is posted to the FDA website. This can result in a delay in AAFCO adding them to our table 101.
- 11) Vitamin name table 90.27 (update) --- Tom P. In the absence of Investigator Tom Phillips, Richard Ten Eyck led this discussion. The list still contains some non-defined ingredients. CVM & others continue to have concerns over "collective term" specific to dogs and cats. Disparity of enforcement on using vitamin K sources (MSBC) in pet food was mentioned. Some of the chemical names need to be nutritionally and technically accurate, and we should clean this up a bit on tocopherols. Development of this table will continue and it may be directed to the Pet Food Committee for input after the list is static and concurrence of action is established. No action was taken.
- 12) Animal Products Edits (update) - Brett, Ben, Stan Brett Boswell has a size-able revision list to the animal protein products section (meat, poultry, by-products of both). Some other regulatory agencies and interested parties wanted to give inputs. Some contradictions among the proposals and need to be evaluated. Plans to have a proposal in January 2020. (plan an extended time block)
- 13) Hemp Update - David Beard David Beard has received requests to preview preliminary information. CVM is also responding to questions though no submission made yet. Steve McGarrah with Hemp Industry relayed that they plan to submit in Q4 2019. No action was taken on this agenda item.
- 14) CVM late add Item #1 (placeholder) AGRN #29 – done above.
- 15) Stale Requests: The following requests for definitions are being removed from AAFCO Consideration. It's been over 2 years since the firms responded to requests for information. Please submit new requests if you want to proceed with a request for: Crude Glycerin, Insectivores in

BSFL, Faba beans in Pulse, Starch modification in pulse starch. Contact AAFCO investigator Erin Bubb with questions. [definitions@aaafco.org](mailto:definitions@aaafco.org)

16) Not-Defined workgroup update (placeholder) – Kent. No update – no meetings.

17) ICG Verification workgroup report – Richard. No meetings since August due to lack of time. Expects maybe one meeting before January.

18) Next Meeting Wednesday January 22, 2020. AAFCO Midyear meeting Albuquerque, NM

Meeting Adjourned 12:58PM EST

Minutes approved 10/4/2019, 14/24 members voting aye, The following members did not vote: Kristen Green, Stan Cook, James Embry, Maggie Faba, George Ferguson, Ali Kashani, Dave Phillips, Tom Phillips and Nathan Price.

## Appendix 2. IDC e-Meeting 9/26/19 Documents

### Action item:

- 1) IDC recommends the BOD replace consideration of version 13 of this document with version 15.4 and provide their recommendation to the membership. *Underlined text indicates differences between the two versions.*
- 2) IDC Recommendation is to strike current language in 2019 OP on page 335 to 339 and insert this language.

### Chapter Six

#### Official Feed Terms, Common or Usual Ingredient Names and Ingredient Definitions

Editor—Richard Ten Eyck, OR

#### A Guide to Submitting New or Modified Ingredient Definitions to AAFCO

Section Editor – Jennifer Roland, FASS

The following guide is offered to assist in development of new or modified feed ingredient definitions. The roles of each party are described below.

The definitions should be non-proprietary as not to favor one ingredient producer over another.

Materials to be used as feed ingredients should have the following attributes:

They should be consistent batch to batch. The material should not be a combination of other ingredients.

The intended use should not be to mitigate, treat, or diagnose a disease (**other than a nutritional deficiency**), but rather to provide nutrition, flavor, aroma for the animal or provide a technical effect in the feed. It is the manufacturer's responsibility to produce a safe ingredient for its intended purpose.

### The Requester

Prior to submitting a request for a new or modified definition, the requester (industry, public, regulatory official, etc.) should consider the current ingredient definitions and develop a draft definition that includes the intended use. The requester should then contact the appropriate investigator (see the AAFCO Official Publication or website for current listing) by email to [definitions@aaeco.org](mailto:definitions@aaeco.org) to discuss the draft definition. Following the initial discussion, a requester should then make a request to the investigator in writing that contains the information described below, if pertinent, so there is sufficient information for the decision process:

- (1) Firm and contact person.
- (2) Summary of the request, including name of the ingredient, intended use, and rationale for the request.
  - a. The proposed name shall:
    - i. Not contain commas.
    - ii. Begin with the base material and then list any needed qualifiers (Beet Pulp plain dried).
    - iii. Be in alignment with common or usual name conventions in 21 CFR 502.5(a).
    - iv. Alternate names to be used on labeling shall be clearly stated at the end of the definition. "Plain Dried Beet Pulp" shall be used on all labeling.
    - v. Not include a trade name or be proprietary in nature.
- (3) Proposed definition.
- (4) Description of the ingredient (e.g., source, physical characteristics, any marketed formulation(s)).
- (5) Proposed labeling (can be generic).
- (6) Historical regulation of the ingredient, if any.
- (7) Description of the manufacturing processes to support identity, composition, and consistent manufacturing of the ingredient. Data to include:
  - a. A description of the manufacturing process,
  - b. A list and regulatory citation for all substances used in its preparation,
  - c. Stability data (including packaging),
  - d. Homogeneity data when ingredient is used at low inclusion rate, and
  - e. Validation information of analytical methods to support testing and/or citation of official methods.
- (8) Use limitations, if any.
- (9) Intended use of the ingredient, including target animal species, use rate, purpose, etc.
  - a. Data and observations (e.g., published literature, animal feeding trials, in vitro studies, empirical data showing technical effect, etc.) to support intended use.

- (10) Safety Assessment. The safety assessment should include a narrative specific to the target animal and, in the case of use in food producing animals, a human food safety assessment should also be provided. Intended uses specific to companion animals will only need to address target animal safety specific to the use description. The safety narrative(s) should assess all the available data. The supporting data which serves as the basis of the safety narrative and conclusion should include:
- a. Assessment of the ingredient for known and/or potential contaminants and impurities.
  - b. Available safety information from published articles and/or unpublished studies.
    - i. Target animal safety information should demonstrate the margin of safety for the intended use.
    - ii. For microbial products (source of DFM, enzymes, fermentation products) information to demonstrate that they are produced from nonpathogenic and nontoxic strains.

(11) List of Cited Literature.

- (12) Copies of all cited analytical reports, studies, and referenced articles. These may be provided in hard copy on a CD in PDF Optical Character Recognition (OCR) format. More specific description of information listed above may be found in FDA Guidance for Industry 221 Recommendations for Preparation and Submission of Animal Food Additive Petitions. It is imperative that the requester provides all information that is available to support their request. Confidential business information should be clearly identified in the request. Only manufacturing information can be marked confidential business information. Safety and utility data are not considered confidential business information. It may be advisable to put confidential business information in a separate document that can be sent, if needed, only to the FDA during the scientific review. Confidential business information should not be disseminated by an investigator without requester's knowledge; also see Section 14(f) of the AAFCO Model Bill or applicable governing state laws.

If not enough information is available in the published literature a feeding trial may be needed.

Please contact FDA CVM Division of Animal Feeds (DAF) for consultation on study design & requirements. Protocols should be submitted to DAF for review prior to conducting the studies.

Once a request has been submitted, the firm should wait to market the ingredient until the definition has been voted on by the AAFCO Ingredient Definition Committee, AAFCO Board, and AAFCO members.

The requester may contact the investigator to determine if the request has been submitted to FDA for their review at the 30-day mark and every 30 days after that time.

The requester may get questions from the investigator or DAF. Questions should be addressed in a timely manner. Pending questions not addressed within 24 months will result in the investigator removing the request from AAFCO consideration.

Some ingredients are fed to intentionally alter the composition of human food (as when making human health benefit claims); these ingredients are not appropriate for review by AAFCO and need to be submitted through the Food Additive Petition (FAP) process to FDA. Additional unanswered safety questions for the ingredient may necessitate an FAP as well. FAP issues will be addressed to the **Director, Division of Animal Feeds, Center for Veterinary Medicine, Food and Drug Administration**. Check the Official Publication for further contact information.

A requester wanting approval pursuant to the Canadian Feeds Act and Regulations is required to file a formal application with the Canadian Food Inspection Agency. Inquiries should be addressed to **Director, Animal Feed Division, Canadian Food Inspection Agency**. Check the Official Publication for further contact information.

#### **The Investigator**

The AAFCO Investigator is a one-person committee that will evaluate and manage the request for a new definition or modified definition. One of the goals of the investigator is to develop official feed definitions that are just and equitable in cooperation with the members of the industry producing the ingredient. A second goal is to assure that the production, sale, and use of ingredients will result in safe and effective feeds. The ingredient definitions should be non-proprietary, meaning they do not include a trade name that would favor one producer over another.

Upon receipt of the request for a new AAFCO ingredient definition or request for modification of an existing ingredient definition, the investigator will:

- 1) Determine if the proposed ingredient definition fits in the requested section of the AAFCO OP. If not, the request will be referred to the appropriate investigator or to the chair of the Ingredient Definitions Committee with the requesting party notified of the referral.

- 2) Confirm that the proposed ingredient does not fall within the scope of an existing ingredient definition.
- 3) Confirm that a proposed revision to an existing ingredient definition will not cause it to be moved to a different section of the OP or fall within the scope of another existing ingredient definition.
- 4) Conduct an initial evaluation to determine whether any unanswered safety questions exist. If so, the requester will be referred directly to **Director, Division of Animal Feeds, Center for Veterinary Medicine, Food and Drug Administration** to pursue a food additive approval. If FDA issues a food additive regulation for the ingredient, the investigator will lead the process of bringing the recommendation before the IDC.
- 5) Confirm that the ingredient definition request is complete and contains all the information needed from the requester listed in the requester section above.

Upon receiving a request for a new or modified AAFCO ingredient definition, the expected administrative review time for the AAFCO investigator is 30 calendar days. If the investigator expects their review to take longer than 30 days, he/she may request an extension from the chair of the Ingredient Definitions Committee or request the chair of the Ingredient Definitions Committee assign the definition to another investigator.

Once the administrative review is complete, the investigator will forward one copy (electronic copy is preferred, but if sent as PDF, use Optical Character Recognition (OCR) format) of the request to **Director, Division of Animal Feeds, Center for Veterinary Medicine, Food and Drug Administration**. If the requestor prefers to send any manufacturing information that is confidential business information directly to FDA, that is acceptable. FDA acts in a consulting role to evaluate the safety and utility of the ingredient.

Confidential business information should not be disseminated by an investigator without knowledge of the requester (also see Section 14(f), AAFCO Model Bill or applicable governing state laws).

The expected time for FDA to complete their safety and utility review is 180 calendar days. The investigator will provide an update to the requester on the status of the submission when the requests for updates are reasonably timed. After a request has been at FDA for 180 days, the investigator may contact the FDA reviewer to determine the status.

It may be necessary for additional data and information to be submitted, which may lead to multiple iterations to completely review a request. If the FDA determines that additional data and information is necessary, they will notify the requestor and copy the investigator.

When FDA has completed their review and recommended publication of the ingredient definition, the investigator will prepare and forward an "Investigators Report" form to the Chair of the Ingredient Definitions Committee. These reports will be added to the agenda of the next committee meeting and are open for viewing and comments.

The investigator may initiate a modification of an ingredient definition based upon their knowledge of the affected industry and not on a specific request from an external requester. It is the responsibility of the investigator to acquire sufficient documentation to support their actions, just as it is industry's responsibility to provide sufficient documentation to support their request.

Once a new ingredient definition is approved by the Ingredient Definitions Committee they forward a recommendation to the AAFCO Board to place the definition in the Official Publication in tentative status. The Board will vote for or against this recommendation before the next membership meeting so members can vote on the recommendation during the Annual or Midyear meetings. Once approved by the membership, the tentative ingredient definition will be published in the Official Publication. Status of a definition only changes upon a vote of the association membership.

The AAFCO bylaws require that each OP-published tentative definition be reviewed by the responsible investigator 30 business days prior to the IDC meeting at the Annual meeting. The investigator shall recommend to the IDC that the definition be deleted, modified, moved to official or remain at tentative.

After 90 business days in tentative status, the responsible investigator may recommend the definition be moved to official (or any other action deemed appropriate). Any recommended change in designation will be voted on by the IDC during the Annual, Midyear or Webinar committee meetings and forwarded to the board for recommendations and then to membership for a vote.

#### **The FDA**

The Division of Animal Feeds in FDA's Center for Veterinary Medicine performs scientific reviews of AAFCO ingredient definition requests and provides recommendations to the IDC investigators for new and amended ingredient definitions.

It typically takes at least 180 calendar days to review a request for a new ingredient definition, depending on complexity of the request and FDA's current workload. The AAFCO investigator can contact the FDA reviewer after that time to inquire about the status.

If FDA considers the request incomplete, FDA may contact the requester directly for that information but must copy the investigator on all communications. It may be necessary for additional data and information to be submitted, which may lead to multiple iterations to completely review a request. If needed to support their scientific review, FDA may directly request confidential business information from the requester.

FDA will provide a written response to the investigator with the conclusions of their review with the recommended ingredient definition. The requester should receive a copy of this response.

#### **The Association**

Once reviewed by the investigator and FDA, the proposed ingredient definition is submitted by the investigator to the chair of the Ingredient Definitions Committee. The IDC is the clearinghouse for all new or modified definitions by acting as a review panel for the investigator to assure that definitions are acceptable and consistent with AAFCO policies and existing definitions. Membership of the committee is drawn from the ranks of AAFCO members. The deadline for submission to the chair is 30 business days before the next IDC meeting and is necessary to allow ample time for committee review and corresponding with the investigator.

Once a new or modified ingredient definition is approved by the Ingredient Definitions Committee, the chair will forward a recommendation to the AAFCO Board to place the definition in the Official Publication in tentative status. The Board will vote for or against this recommendation before the next membership meeting so members can vote on the recommendation during the Annual or Midyear meetings. Once approved by the membership, the tentative ingredient definition will be published in the Official Publication. Status of a definition only changes upon a vote of the association membership.

The AAFCO bylaws require that each OP-published tentative definition be reviewed by the responsible investigator 30 business days prior to the IDC meeting at the Annual meeting. The investigator shall recommend to the IDC that the definition be deleted, modified, moved to official or remain at tentative. After 90 business days in tentative status, the responsible investigator may recommend the definition be moved to official (or any other action deemed appropriate). Any recommended change in designation will be voted on by the IDC during the Annual, Midyear or Webinar committee meetings and forwarded to the board for recommendations and then to membership for a vote.

Firms may use the ingredient definition once the AAFCO membership vote has occurred affirming the recommended definition to appear in the Official Publication. Prior to publication in the Official Publication firms wanting to manufacture feed with the ingredient may use committee minutes and general session minutes to document the completion of the process. These are typically posted on the AAFCO website. If deletion of an ingredient definition from the Official Publication is proposed, the investigator will follow the same dateline as if proposing any other ingredient definition change. This will allow the IDC the opportunity to review and discuss the proposed deletion.

#### **Canadian Food Inspection Agency**

The Chair of the IDC will share all completed definition recommendations with Canadian officials for their information once the forms have been forwarded to the Ingredient Definitions Committee.

A requester wanting approval pursuant to the Canadian Feeds Act and Regulations is required to file a formal application with the Canadian Food Inspection Agency. Inquiries should be addressed to **Director, Animal Feed Division, Canadian Food Inspection Agency**. Check the Official Publication for further contact information.

#### **Additional Pathways to AAFCO Published Ingredient Definitions**

Section Editor – Jennifer Roland, FASS

##### **Animal Food Additives Approved by FDA**

Animal food additives approved by FDA are listed in 21 CFR 573. The food additive regulation specifies the requirements for safe use of the food additive and establishes the common or usual name for the new ingredient. To ensure that the AAFCO Official Publication listing of defined feed ingredients is complete, the approved food additive, as specified in the published final rule, will be incorporated in the AAFCO Official Publication's Official Common or Usual Names and Definition of Feed Ingredients chapter.

The designated FDA representative to the IDC will provide the appropriate investigator with the food additive regulation and will prepare a recommendation form and forward it to the Chair of the Ingredient Definitions Committee for consideration at the next committee meeting.



Since the ingredient has gone through the formal FDA approval process, once the AAFCO Ingredient Definitions Committee, the AAFCO Board, and AAFCO Membership have approved the definition, the entry will be incorporated in the AAFCO Official Publication as official.

#### **GRAS Notified Substances with 'No Questions' Letters from FDA**

A list of GRAS Notices filed voluntarily by the notifiers pursuant to 21 CFR 570.205 which FDA has evaluated (21 CFR 570.265) and determined that it had no questions regarding the conclusion that the notified animal food substance is generally recognized as safe (GRAS) under the intended conditions of use is provided in Section 101 of Chapter 6 of the AAFCO OP the filed notice and the FDA response letter provide information (identity, manufacture, specifications, intended effect, and safety) on the substance under the intended use conditions, and the most up to date version is posted at the following website:

[<http://www.fda.gov/AnimalVeterinary/Products/AnimalFoodFeeds/GenerallyRecognizedasSafeGRASNotifications/ucm243845.htm>] This section is provided as a convenience for the State Feed Control Officials. The Investigator of section 101 will adapt the information as provided on the FDA website and consult with FDA on an appropriate common or usual name.

While the information on the substance and the intended use is specific to that provided by the notifier, other firms may use information within the notice along with other data specific to their substance to support the GRAS conclusion (see 21 CFR 570.3-570.280). Such other firms who conclude that an animal food substance is GRAS under the conditions of its intended use by relying on a posted GRAS notice submitted by another person shall carefully evaluate whether their production process, product specifications and intended conditions of use, fall within the parameters addressed by the referenced GRAS notice. GRAS conclusions are not legally required to be submitted to FDA, but may be voluntarily submitted in accordance with the GRAS Notice regulation (21 CFR Part 570.205). Nevertheless, firms that elect to make use of the independent GRAS provision must document their Independent Conclusions of GRAS prior to marketing a substance for a particular intended use. State Feed Control Officials may request the Independent Conclusion of GRAS documentation to support their registration or inspection duties.

The table in Section 101 is adapted from the FDA Animal GRAS Notification website and includes ingredient definition information (substance, common or usual name (from the FDA response letter), and intended use (including use limitations, if any)). For other information, see the FDA response letter for the GRAS Notice (available at link provided above).

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

#### **Color Additives—Approved by FDA**

**Color Additives intended for use in animal feed are approved by FDA (specifically the Center for Food Safety and Applied Nutrition) are listed in 21 CFR 73 & 74. The color additive regulation specifies the requirements for safe use of the color additive and establishes the common or usual name for the new ingredient. To ensure that the AAFCO Official Publication listing of defined feed ingredients is complete, the approved color additive, as specified in the published final rule, will be incorporated in the AAFCO Official Publication's Official Common or Usual Names and Definition of Feed Ingredients chapter.**

**The designated FDA representative to the IDC will provide the appropriate investigator with the color additive regulation and will prepare a recommendation form and forward it to the Chair of the Ingredient Definitions Committee for consideration at the next committee meeting. Since the ingredient has gone through the formal FDA approval process, once the AAFCO Ingredient Definitions Committee, the AAFCO Board, and AAFCO Membership have approved the definition, the entry will be incorporated in the AAFCO Official Publication as official.**

**Action:** X      **Other:** Addition to table 101.1

<b>AGRN (select for detailed record)</b>	<b>Notifier</b>	<b>Substance</b>	<b>Common or Usual Name</b>	<b>Intended Use</b>	<b>Intended Species</b>	<b>Date of Filing</b>	<b>FDA's Letter (select to view letter)</b>
<a href="#">27</a> (PDF-177 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 (transformation event PY203)	Phytase	To increase the digestibility of phytin-bound phosphorous or to increase phosphorous availability from phytate in swine feeds when used to provide 500-4500 phytase activity units (FTU)/kg complete feed.	Swine	9/6/2018	<a href="#">FDA has no questions.</a> (PDF - 4 pages)

<b>AGRN (select for detailed record)</b>	<b>Notifier</b>	<b>Substance</b>	<b>Common and Usual Name</b>	<b>Intended Use</b>	<b>Intended Species</b>	<b>Date of Filing</b>	<b>FDA's Letter (select to view letter)</b>
<a href="#">29</a> (PDF - 138 pages)	G-Science, Inc.	clinoptilolite of sedimentary origin	clinoptilolite of sedimentary origin	To be used as an anti-caking agent at levels up to 1% by weight in the complete diet.	Cattle, swine, goats, sheep, broiler chickens, turkeys for meat, cats and dogs.	12/11/2018	<a href="#">FDA has no questions.</a> (PDF - 5 pages)

## Inspection and Sampling Committee Report

2019 AAFCO Annual Meeting  
August 5, 2:00–3:00 pm, Louisville, Kentucky

### Committee Recommendations:

The revisions to the AAFCO Feed Inspector's Manual for alignment with FSMA have been completed and accepted by majority by the committee. The committee recommends the Board of Directors accept the revisions to the Feed Inspector's Manual as submitted.

**Board Recommendations:** Report accepted October 17, 2019

**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 Klommmhaus – FDA Advisor; Jan Campbell – NGFA; Stephanie Adams – AFIA
- 2) Sampling Study Proposal Review Work Group Charge: Review Proposals received to determine which candidate is the best fit to complete the study as outlined in the Request for Proposal. The group includes the following members: Miriam Johnson (ISC Liaison) – NC; Brett Groves – IN; Mark LeBlanc – LA; Steve Stewart – MN; Josh Arbaugh – WV; Louise Calderwood – AFIA
- 3) 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; Eric Brady – TN; Barb Schroeder – MN; Kevin Klommmhaus – FDA; Stephanie Adams – AFIA.
  - 2019 AITS Cadre: Jessica Gore – NC (POC for AITS); George Ferguson – NC; Eric Brady – TN; Stevie Glaspie – MI; Jamie Spencer – KS; Jordan Mancini – MN
  - 2019 BITS Cadre: Brett Groves – IN (POC for BITS); Eric Brady – TN; Steve McMurry – KY; Joe Slater – MO; Don Robinson – IN; Jamey Johnson – AK; Miriam Johnson – NC

### Committee Participants

**Members Present:** Miriam Johnson – NC (Committee Chair); Chad Linton – WV (Committee Vice Chair); Jessica Gore – NC; Bob Church – MT; Brett Groves – IN; David Dressler – PA; Laura Scott – CAN; Jim True – KY; Jacob Fleig – MO; Tim Lyons- MI; Jenny Combs – KY; Wayne Nelson – CT; Kevin Klommmhaus – FDA

**Members Present Via Telephone:** Ethan Willis – MO

**Advisors Present:** Meghan Dicks – AFIA; Jan Campbell – NGFA; Chris Olinger – NGFA; Stephanie Adams – AFIA

**Others Present:** Sue Hays – AAFCO Executive Director

### Committee Report

Miriam Johnson (Committee Chair) called the meeting to order at 2:05 PM EST. Members and advisors in the room introduced themselves. 13 committee members and 4 industry liaisons present.

#### Aseptic Sampling Work Group – Miriam Johnson, NC

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 aseptic sampling SOP's gathered from industry and regulatory groups. A brief update of the progress achieved by the group was given by Miriam Johnson. Updates include the addition of a graphic depicting a method for How to Don Sterile Gloves. Permission to utilize the image from the creator has been requested. The workgroup has been working with B. Braun Medical to ensure we do not impose on copyrights. Additional guidance was asked of the Board of Directors with the response being, as long as the image contains an acknowledgement of the creator, we should not

infringe on their copyright. The image is marked as such, therefore the workgroup will move forward with utilizing the graphic. The workgroup continues to determine additional updates and revisions needed, but at the time of this meeting did not feel it was complete enough to request a vote of acceptance by the committee. The work group feels that they will have a completed 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 was performed to ensure it is aligned with the requirements of FSMA. The work group and committee have completed their official review. Chad Linton – WV, moved to accept the updated sections of the AAFCO Feed Inspectors Manual. Jim True – KY, seconded the motion. During discussion, Brett Groves – IN, identified the previous GMP checklist listed in the AAFCO Official Publication no longer exists therefore the Inspector's Manual no longer matched and the GMP checklist had to be removed from the manual. The committee was posed with the question of what actions should be taken to replace this information. It was suggested the manual could make a reference to the AAFCO Non-Licensed Medicated Feed Establishment Inspection Form listed in the Official Publication. The committee agreed to task the AITS & BITS Alignment Workgroup to find a replacement Model Bill Regulation for the GMP checklist that has been removed from the AAFCO Official Publication and Feed Inspectors Manual. The motion on the floor was then called to vote. Motion Carried. The newly revised edition will be sent to BOD for approval and upon approval posted to the AAFCO website. The workgroup charged with the review of the Inspector's Manual for FSMA alignment has completed their task and has been dissolved.

#### **AAFCO Sampling Study – Miriam Johnson, NC**

##### **Work Group Update:**

During 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 was to write a Request for Proposal in which current sampling methods will be re-validated through independent peer reviewed research. Discussion revealed the RFP has been approved by the Inspection and Sampling Committee and was been sent to the Board of Directors for approval. The link to the RFP was distributed to appropriate venues that could conduct the study. Proposals were received for 90 days to which 3 possible bids were received. Review group members have been selected and will begin the process of selecting a bid for the sampling study. Sue Hayes, AAFCO, stated that she is willing to help write any letters or help facilitate any paperwork or phone calls during this process. The workgroup for the creation of the RFP has been dissolved at this time and the task of reviewing the bids has been charged to the review group.

**Review Group Members:** Brett Groves – IN; Mark LeBlanc – LA; Steve Stewart – MN; Josh Arbaugh – WV; Louise Calderwood – AFIA

#### **AITS Seminar Review – Jessica Gore, NC**

The Alabama Department of Agriculture hosted the 2019 AITS seminar June 18-20, 2019 in Montgomery, AL. We hosted 37 attendees representing 13 states, and this was the first training in which the cadre used the new standardized curriculum which included participation from CLEAR. Feedback from the attendees was taken after the meeting with requests to limit the topics covered in BITS and more opportunity for tabletop exercises. The AITS seminar workgroup will reach out to the Education and Training Committee to conduct a survey of state needs for possible trainings for the next year. If interest is still growing by the states to host AITS annually, we are looking for a host state for 2020. Please contact Jessica Gore if interested in hosting.

#### **BITS Seminar Review – Brett Groves, IN**

The 2019 BITS seminar will be hosted by the Georgia Department of Agriculture on September 17-19, 2019 in Atlanta, GA. The registration deadline is August 26, 2019. The BITS seminar workgroup will reach out to the Education and Training Committee to conduct a survey of state needs for possible trainings for the next year. If a state would like to host a BITS training, please let Brett Groves know that you are interested.

#### **AITS & BITS Alignment Workgroup – Miriam Johnson, NC**

##### **Workgroup Update:**

A workgroup was formed prior to the Midyear Meeting in Anaheim, CA in 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. Discussion during the Feed Inspector's Manual update revealed a charge will be placed on the workgroup to find a replacement Model Bill Regulation for the GMP checklist that has been removed from the AAFCO Official Publication and Feed Inspectors Manual. Work on updating the presentations and course materials based off of survey results from the 2019 AITS seminar and the Education and Training Committee query will also be tasked to this workgroup.

**Workgroup Members:** Miriam Johnson (Lead) – NC; Chad Linton – WV; Brett Groves – IN; Eric Brady – TN; Barb Schroeder – MN; Dave Dressler – PA; Jamie Spencer – KS; 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 2:30 PM EST.

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing / Status</b>
Work Group	AAFCO Feed Inspector's Manual	Develop protocol for techniques of aseptic sampling and update AAFCO Inspector's Manual	August 2020
Work Group	Sampling Study Proposal Review	Proposal bids reviewed and research establishment chosen	January 2020
Work Group	AITS Guidelines & Curriculum	Update and Standardize AITS Guidelines & Curriculum	June 2020

## Laboratory Methods and Services Committee Report

2019 AAFCO Annual Meeting  
August 6, 9:30–5:30 pm, Louisville, Kentucky

**Committee Recommendations:** None

**Board Recommendations:** Report accepted October 17, 2019

**Association Actions:** None

### Committee Participants

**Members Present:** Josh Arbaugh, West Virginia Dept. of Agriculture; Ametra Berry, Georgia Dept. of Agriculture; Deepika Curole, Louisiana Dept. of Agriculture; Manisha Das, FDA/CVM/Division of Animal Feeds; Sally Flowers, Nebraska Dept. of Agriculture; Teresa Grant, North Carolina Dept. of Agriculture; Tai Ha, Nebraska Dept. of Agriculture; H. Dorota Inerowicz, Office of the Indiana State Chemist; Robin Johnson, Montana Dept. of Agriculture; Mary Koestner, Missouri Dept. of Agriculture; Dominika Kondratko, Colorado Dept. of Agriculture; Mark LeBlanc, Louisiana Dept. of Agriculture; Patty Lucas, Florida Dept. of Ag and Consumer Services; Kristi McCallum, Colorado Dept. of Agriculture; Rebecca Moseley, Alabama Dept. of Agriculture; Brenda Snodgrass, Oklahoma Dept. of Agriculture; Michele Swarbrick, Minnesota Dept. of Agriculture; Lei Tang, FDA/CVM/OF/CVM/OSC/DAF MPN4; Nancy Thiex, Life Member; Sharon Webb, University of Kentucky Regulatory Services

**Advisors Present:** BJ Bench, Tyson Foods; Jeff Horst, Agri-King; Alexis Huyghues-despointes, JM Smucker; Paul Mostyn, Westway Feed; Lars Reimann, Eurofins; Ken Riter, Nestle-Purina Analytical Labs/PFI; Leo Schilling, Eurofins; Liberty Sibanda, Randox Food Diagnostics

### Committee Report

#### Sub-Committee Activities

**ACTION:** Update the 2014 AAFCO Quality Assurance/Quality Control Guidelines for Feed Laboratories to comply with ISO17025:2017

#### Committee Minutes

- 1) Call to Order by Kristi McCallum at 9:30 AM EST.  
The agenda was approved.  
Introductions – A meeting sign-in sheet circulated to attendees.
- 2) Committee roster was reviewed and updated. Kristi McCallum removed members and advisors who retired or no longer wished to serve on the committee.
- 3) Advances in Veterinary Drug Multi-residue Methods using High Resolution Mass Spectrometry – Sherry Turnipseed, FDA
  - a. Sherry Turnipseed from FDA-Animal Drugs Research Center gave a presentation on the advances in veterinary drug multi-residue methods using high resolution mass spectrometry/orbitrap with heated electrospray (HRMS). By 2030, over 50% of all fish sold will be farmed (aquaculture) and much will be imported in from other countries. Veterinary drugs, approved in EU and Japan, can be of concern in residue levels in imported foods such as farmed fish. Residue levels of drugs and antibiotics can have acute and chronic effects in humans. Most current LC/MS/MS methods are target specific; however, high resolution mass spectrometry allows the analyst to look for an unlimited number of compounds in various matrices. FDA validated a screening method for 70-100 of the most likely used drugs, and semi-targeted ~450 additional drug compounds. After analyzing the test samples, they applied the method to “violative” regulatory samples and incurred fish from CVM. These samples compared well with the “original” results. Next they validated for other chemical contaminants such as disinfectants, pests, human pharmaceuticals, etc. This method could potentially be used by state laboratories for animal feeds.
- 4) Update on Mycotoxin Multi-laboratory Collaboration using Randox Multiplex Biosensor – Liberty Sibanda, Randox
  - a. Liberty Sibanda presented data on the collaborative study done following the AAFCO Mid-year meeting involving 14 state agriculture laboratories using the Randox multiplex biosensor biochip array technology.

- b. Nine state agriculture laboratories participated in the collaborative study. Randox provided the instrumentation, training and test kits to each participating laboratory. The samples used in the study were previously analyzed AAFCO Proficiency Test mycotoxin samples provided by the Missouri Department of Agriculture.
  - c. In this collaborative study the Evidence Investigator Biochip Myco 7 Array was assessed for performance according to the Association of American Feed Control Officials' (AAFCO) set Method Performance Criteria. There were 17 samples analysed in total. One method was used with the main goal of assessing the reproducibility of the method. Reproducibility was assessed by means of Z-Scores since the collaborative study was structured in a PT format, as well as HorRat Values. For the purposes of this study a Z-Score interval of  $-2 \leq Z \leq +2$  and a HorRat Value range of  $< 0.3 \leq \text{HorRat} \leq 2$  were used.
  - d. There was a 99% Z-Score for Fumonisin analysis with a corresponding HorRat Value of 2.13 ( $>2$ ) for one of the 17 samples. Ochratoxin A (OTA) had a 99% Z-Score pass, and HorRat rate of 88% due to 2 of the 17 samples which recorded HorRat values  $<0.3$ . Aflatoxin G1 and G2 had a 99% Z-Score pass rate, however, 2 samples of the 17 had  $<0.3$  values. There was a 100% pass for both Z-Scores and HorRat Values for DON, while T-2/HT-2 Toxin had 3 laboratories failing Z-Scores (Laboratories 1, 3 and 4), with a 100% pass for HorRat Values. Aflatoxin B<sub>1,2</sub> had a 99% pass rate for Z-Scores, with only one sample recording a HorRat value  $<0.3$ . There was a 98% Z-Score pass for Zearalenone (ZEA) while only one of the 17 samples failed the HorRat with a value of  $<0.3$ . This data illustrated that the Evidence Investigator Biochip Myco 7 Array test met the performance criteria under these collaboration study conditions and is therefore *fit-for-purpose* for use.
  - e. Randox has written a report which will be uploaded to the AAFCO LMSC website page. This instrument also has additional platform capabilities for THC/CBDs, vet drug residues and pesticides.
- 5) Rick Hendrick from Milestone shared information about their simplified sample prep microwave digestion for ICP. They have units for digestions, extractions, synthesis, ashing and direct mercury analysis. The microwaves do not vent, so there is no loss of the more volatile analytes, such as mercury. With the direct mercury analyzer, there is no sample prep and there are three configurations based on levels of concentration.
- 6) FDA Cooperative Agreement – Robin Randolph, APHL
- a. APHL is working under a bridge extension agreement for ISO17025 accreditation and resources, including training for Genome Trakr and *Good Test Portions*, success stories on how accreditation has helped laboratories strengthen their defensibility and confidence in data.
  - b. There are two ISO17025 accreditation resource libraries available to laboratories; one for 2005 and one for 2017. There is a GAP analysis for the two standards, a PT provider list and guidance documents such as best practices for data acceptability. They are currently working on a regulatory compliance review checklist.
  - c. Through the cooperative agreement, they have been working with 11 laboratories to help them with the accreditation process – two laboratories have been accredited and one close to being accredited.
  - d. There will be a GenomeTrakr meeting 9/17-9/18 and GalaxyTrakr training 9/16-9/17.
  - e. APHL worked with AAFCO for three additional *Good Test Portions* trainings and have funds for four additional 2-day trainings. Contact Nancy Thiex if your agency is interested in hosting a training.
  - f. The IFPTI lab curriculum framework is being built-out for the entry level content. The committee is currently working on Aseptic Technique and Basic Foodborne Pathogens. The committee is in need of help with the Dairy Regulatory and Shellfish programs. If you are able to assist, please contact Robyn Randolph at APHL.
- 7) Laboratory Sampling and Application of *Good Test Portions* – Nancy Thiex and NY Dept. of Agriculture
- a. Nancy Thiex discussed lab sampling activities. There will be a *Good Test Portions* training at the Denver, CO AOAC meeting on 9/7 and 9/8.
  - b. Patti Lucas asked what is needed to host a training. Nancy said ~20 participants, a training room with tables (2 per table), and PowerPoint presentation capability. She stated it would be good to have access to a lab, but not necessary.
  - c. Nancy is developing a course flyer and pursuing success stories.

- d. There is a pilot sampling PT coming up. So far, 14 labs have indicated an interest in participating. See AAFCO PT committee minutes for more information.
- e. The New York Department of Agriculture gave a presentation of the application of *Good Test Portions*. They eliminated the use of the Jones riffler and began grinding the entire sample. They added a vacuum and container to the mill to aid in grinding the entire sample. NY reported that it takes ~ 55 minutes to grind the entire sample and clean in between samples.
- 8) Quality Assurance Sub-committee Topic: Crosswalk 2005 ISO17025 and the New ISO17025:2017 Standard to Update the AAFCO QA/QC Manual.
  - a. Sharon Webb and her colleagues have developed a cross-walk between the two standards.
  - b. Kristi McCallum and Sharon Webb will revise the AAFCO QAQC Manual to meet the new ISO17025:2017 standard and will send it out in "Draft" form to the Quality Assurance Sub-committee for review. The revision will be done by the AAFCO 2020 Mid-year Meeting.
- 9) AOAC Update – Palmer Orlandi, AOAC
  - a. AOAC is changing their business model to address growing needs, new standard development and affordability. This new harmonized program has an Analytical Solutions Forum, which gives an opportunity for open discussion to stimulate participation and gain multiple perspectives. The Forum wants to look at the most pressing needs and then bring the right people (stakeholders) together to address. They want to define problems before they are a health risk, help overcome barriers, and look to share costs/resources between stakeholders with the same needs. They have developed Advisory panels (funders) to help establish priorities, but not drive the science.
  - b. AOAC will give an overview of the current programs, have an emerging issues roundtable and look at issues just above the horizon to use to develop the agenda for the annual meeting.
  - c. AOAC launched three new programs for the midyear meeting – Furans, Cannabis/Hemp and Food Authenticity (olive oil, honey and milk products).
  - d. AOAC wants to revitalize efforts for education and training, update outdated methods and start to lay the groundwork for "AIM" – the Alternative International Methods and Standards Program. AOAC hoped that AIM will improve the way that AOAC approved for ISO methods. They need a larger body of SMEs, so let them know if you are interested.
- 10) AOAC Updates, Completion of NASDA, PFP, Acceptance Documents – Nancy Thiex
  - a. Nancy Thiex gave miscellaneous updates. The Lab Curriculum framework is a great resource for AAFCO labs; contact Robyn with APHL if you want to be a reviewer. Patty Lucas said it will be a great tool to utilize for training. Nancy said the ethics training will be coming out soon.
  - b. Nancy stated the AOAC sugars method 2018.16 is with the copy editors and the Fructan Assay kit method is a first action 2018 method 2018.07 and in the JAOAC. 2 new methods are coming soon – 6 common sugars by LC/MS and Determination of sugars in animal feed, pet food and human food by IC/PAD.
  - c. Nancy said there is a Preventive Control animal feed (PCAF) checklist that is very generic but will give good information to evaluate any new lab initiative.
- 11) Moisture Best Practices Workgroup - Teresa Grant, Michael Richardson, Lawrence Novotny, Bozena Draczynska-Lusiak
  - a. Lawrence gave a brief presentation on the progress of the moisture best practices study. Lawrence is obtaining 6 test materials to comminute and split for shipment to participating labs. The samples will include dry dog and cat food (6-10% moisture), semi-moist dog and cat food (20-30% moisture), and wet dog and cat food (60-80% moisture). Participating labs will analyze in duplicate by Karl Fischer at each of the following times – 15 min 30 min, 1 hour, and overnight. **Lawrence needs laboratory participation with the requirements that each participating laboratory must have their own KF equipment. The objective of this study is to find optimized conditions to present as best practices. If your laboratory is interested in participating, please contact Lawrence Novotny.**
- 12) Working Group updates
  - a. There was a brief discussion as to what method needs should be addressed. Nancy suggested sampling; looking at what is out there and what might improve productivity without compromising accuracy. Thought it would be good to have a brainstorming group before labs invest a lot of money in equipment. She also mentioned there are better ways to store samples than bottle, such as flat pans/trays.



- b. CTC – Leo Schilling gave a CTC method update. Eurofins used the AOAC2008.09 OTC method, but modified the injection volume and % gradient. The next steps are method trials, revising method, SLV in all applicable matrices and method transfer protocol to participating labs. Nancy Thiex mentioned the possibility of adding notes or minor modifications to the methods. Nancy stated AOAC AIM should have a way to sort this out, rather than performing a full validation.
  - c. Fat soluble vitamins – Dorota Inerowicz gave an update on fat soluble vitamins (A&E). Seven vitamin premix samples were sent to Microtrac Particle Analysis Lab, and they found the particle size varied greatly for most of the samples. The Good Test Portions document was used to relate the fundamental sampling error (FSE) to sample mass for a given particle size. The calculated sample mass was highly dependent on particle size. A study for Vitamin A will be performed at the MN Department of Ag using 10g and 100g test portions. The data will be presented at the midyear meeting.
  - d. Multi-element metals – Michele Swarbrick updated on multi-element metals, stating they are working on Best Practice recommendations for metals.
  - e. Mycotoxins – No update from working group members
- 13) Method Needs Discussion – All Members and Advisors
- a. A method needs survey was sent out to the state laboratories and program officials. The results of the survey showed 36 state programs responded and 43 laboratories. The programs responded that method priorities were needed for microbiology, prohibited materials, vet drugs and mycotoxins. Common priorities between the lab and programs were microbiology, vet drugs at formulation levels, multi-analyte mycotoxin confirmation, multi-analyte pesticides, vet drugs residue levels and fat-soluble vitamins. Nancy needs helpers for further evaluation as the data collected from this survey was extensive. Email Nancy, Sharon or Kristi by the end of the month if you are interested. Kristi stated that this was a bigger issue than just our committee. We need collaboration with other AAFCO committees.
  - b. B.J. Bench from Tyson Foods mentioned that we need to look at peroxide values (PV). The Pet Food Alliance is looking at PVs and would like standardization on PV assessment. AOCS is heavily engaged now. Due to oxidation of fats, they need to be extracted out to get the right PV. A question was raised to addition of peroxide values to the AAFCO PT pet food scheme and if so, how could the AAFCO PT program keep this PT for peroxides only for US participants.
- 14) 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 30, 2019
K McCallum S Webb	8	Update the 2014 AAFCO QA/QC Guidelines for Laboratories	Beginning of 2020 prior to Mid-year

## Appendix 1

### 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.aaftco.org/Regulatory/Committees/Laboratory-Methods-and-Services#minutes>

## **Model Bills and Regulations Committee Report**

2019 AAFCO Annual Meeting  
August 5, Louisville, Kentucky

### **Committee Recommendations**

The Model Bills and Regulations Committee recommends the following revisions be made to the Model Bills and Regulations, and that the AAFCO Board of Directors review the proposed revisions for future consideration by the Association membership.

- 1) Delete Regulation PF3(e) from the Model Regulations for Pet Food and Specialty Pet Food as indicated in Attachment D.
- 2) Revise Regulation PF4(g) within the Model Regulations for Pet Food and Specialty Pet Food as indicated in Attachment E.
- 3) Revise Regulation 3(a)(4)(XII)(c) within the Model Regulations Under the Model Bill as indicated in Attachment E.

### **Board Recommendations**

Report accepted October 17, 2019

Board accepted recommendations 1–3

### **Association Actions: None**

### **Committee Report**

Model Bills and Regulations Committee Chairman Doug Lueders called the meeting to order at 1:00 p.m. on Aug. 5, 2019. 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), Robert Geiger (Indiana), Kristen Green (Kentucky), Ben Jones (Texas), Eric Nelson (FDA), 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 (NGPFMA), Jan Campbell and David Fairfield (NGFA), and Angele Thompson and Pat Tovey (PFI).

AAFCO Executive Director Sue Hayes also participated in the meeting.

#### **Minutes from Previous Committee Meeting**

Chairman Lueders noted that minutes from the January 21, 2019 committee meeting conducted in Savannah, Georgia were previously approved on March 27, posted on the AAFCO website and Feed BIN, and were included in the 2019 AAFCO Annual Meeting Committee Reports.

#### **SUIP Working Group Report**

Robert Geiger moved to accept for discussion recommendations previously made by the Statements for Uniform Interpretation and Policy (SUIP) workgroup that had been tabled by the committee during its Savannah meeting.

Ben Jones seconded the motion. The committee approved.

#### **Old Business**

##### **1) Tabled (postponed) from Savannah - Recommendations for SUIP #3 (Attachment A)**

The committee considered proposed recommendations to SUIP #3 – Trade or Proprietary Names as indicated in Attachment A.

Richard Ten Eyck moved to postpone action on the recommendation until the updated Guide for New Ingredient Submissions is considered by the AAFCO membership. Ken Bowers seconded the motion. The committee approved.

##### **2) Tabled (postponed) from Savannah - Recommendations for SUIP #17 (Attachment B)**

The committee considered proposed recommendations to SUIP #17 – Carriers as indicated in Attachment B.

Ken Bowers moved to postpone action on the recommendation until the Model Bills and Regulations Committee considers the proposed Regulation 6(h) language. Scott Ziehr seconded the motion. The committee approved.

##### **3) Proposed Revision to Model Bill Section 7 - Adulteration (Attachment C)**

The committee considered proposed revisions to Model Bill Section 7 – Adulteration as indicated in Attachment C.

Robert Geiger moved to postpone action on the proposed revision until the committee's next meeting. Ken Bowers seconded the motion. The committee approved.

#### **New Business**

The committee proceeded to consider new business.

**1) Deletion of PF3(e) - Brand and Product Names (Attachment D)**

The committee considered the proposed deletion of PF3(e) from the Model Regulations for Pet Food and Specialty Pet Food as indicated in Attachment D.

Ken Bowers moved to delete PF3(e). Kristen Green seconded the motion. The committee approved.

**2) Proposed Revision to Model Regulations for Pet Food and Specialty Pet Food PF4(g) - Expression of Guarantees (Attachment E)**

The committee considered the proposed revision of PF4(g) from the Model Regulations for Pet Food and Specialty Pet Food as indicated in Attachment E.

Scott Ziehr moved to accept the proposed revision. Ken Bowers seconded the motion. The committee approved.

**3) Proposed Revision to Model Regulations 3(a)(4)(XII)(c) - Expression of Guarantees (Attachment E)**

The committee considered the proposed revision of Model Regulations 3(a)(4)(XII)(c) as indicated in Attachment E.

Ken Bowers moved to accept the proposed revision. Robert Geiger seconded the motion. The committee approved.

#### **Assignments for Midyear Meeting**

Concern was expressed by Leah Wilkinson, AFIA, that revisions to Model Regulation 4(g) – Expression of Guarantees for microbials approved by the AAFCO membership during the Annual Meeting Association Business Session could cause the industry to incur significant relabeling costs.

In response, Chairman Lueders directed the following individuals to further evaluate the issue and report findings to the committee during the 2020 AAFCO Midyear Meeting: Jan Campbell, Emily Helmes, Leah Wilkinson, Angele Thompson, Scott Ziehr, and an FDA representative to-be-determined (Padma Pillai).

#### **Adjournment**

Chairman 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 2:00 p.m.

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

## Attachments for August 5, 2019, Meeting

### Attachment A – Proposed Revision to Statements for Uniform Interpretation and Policy (SUIP) #3

The SUIP Working Group recommends moving SUIP #3 - Trade or Proprietary Names - to the deleted list. The rationale is that AAFCO Ingredient Definitions Committee (IDC) has already incorporated this language into the update to the Guide for New Ingredient Submissions.

### Attachment B – Proposed Revision to Statements for Uniform Interpretation and Policy (SUIP) #17

The SUIP Working Group recommends adding Regulation 6(h) language regarding **Carriers** (as below) to Regulation 6 of the Model Regulations Under the Model Bill. Move SUIP #17 – Carriers to the deleted SUIP list if/when 6(h) is approved by the AAFCO membership.

*6(h) Each carrier shall be listed in the ingredient statement on the label unless it meets the criteria for an incidental ingredient [21 CFR 501.100(a)(3)].*

### Attachment C – Proposed Revision to Model Bill Section 7. Adulteration (new language bold and underscored)

A commercial feed shall be deemed to be adulterated:

- (a)
  - (1) If it bears or contains any poisonous or deleterious substance which may render it injurious to **human or animal** health; but in case the substance is not an added substance, such commercial feed shall not be considered adulterated under this subsection if the quantity of such substance in such commercial feed does not ordinarily render it injurious to **human or animal** health; or

### Attachment D – Proposed Revision to Model Regulations for Pet Food and Specialty Pet Food PF3(e)

#### Background:

PF3(e) has been in the AAFCO OP since the 70s or 80s. Subsequently, many changes have been made to PF(3), including the addition of the "with" regulation and further refinement of the flavor and other regulations in this section. In the 90's there was a complete rework of the regulations although the working group was told not to change the intent of the regulations. The workgroup at that time was not sure of the intent of PF3(e), so they left it in the PF Regulations.

It appears that PF3(e) was meant as a catch all but has outlived its usefulness. Regulators and industry have yet to identify a situation under which it might be valid to use today.

#### **Pet Food Committee Recommendation:** Remove PF3(e)

- ~~(e) The product name of the pet food or specialty pet food shall not be derived from one or more ingredients unless all ingredients are included in the name, except as specified by Regulation PF3 (b) or (c); provided that the name of an ingredient or combination of ingredients may be used as a part of the product name if:~~
  - ~~(1) The ingredient or combination of ingredients is present in sufficient quantity to impart a distinctive characteristic to the product or is present in amounts which have a material bearing upon the price of the product or upon acceptance of the product by the purchaser thereof; or~~
  - ~~(2) It does not constitute a representation that the ingredient or combination of ingredients is present to the exclusion of other ingredients.~~

### Attachment E – Proposed Revisions to Model Regulations for Pet Food and Specialty Pet Food PF4(g) and Model Regulation 3(a)(4)(XII)(c)

#### Background:

"Guarantees for crude protein, crude fat, **and** [emphasis added] crude fiber are not required when the pet food or specialty pet food is intended for purposes other than to furnish these substances or they are of minor significance relative to the primary purpose of the product, such as a mineral or vitamin supplement."

There is an opinion that PF4(g) should not be interpreted as an all or none requirement for an exclusion for the three guarantees. Rather PF4(g) should allow for exclusion of one, two, or all three of the guarantees according to whether the product is not intended to, and in fact does not, provide significant amounts of one or more of the three nutrients. Examples, a fat/fatty acid supplement composed of

triglycerides for dogs does not provide much, if any, protein or crude fiber, so guarantees for protein and crude fiber should be allowed to be excluded from the guaranteed analysis on that product's label. Another example would be a fiber supplement for, say, specialty pets like rabbits or guinea pigs that is made from wheat stalks. The product would not be intended to, and would not, provide much crude fat or crude protein, and in my opinion should not be required to make guarantees for anything other than crude fiber and moisture.

So, there are two possibilities here:

- 1) The regulation was poorly written and needs to be amended if my interpretation of its intent is correct; or,
- 2) The regulation was intended to be an all or none exemption from the requirement for crude protein, crude fat AND crude fiber guarantees.

A proposal in typical AAFCO editing format (deleted text struck through, new text bold and underscored) for clarifying PF4(g) is:

**Pet Food Committee Recommendation:** PF4(g) CLARIFICATION - Regulation PF4 (g) Guarantees for crude protein, crude fat, ~~and~~ or crude fiber are not required when the pet food or specialty pet food is intended for purposes other than to furnish **one or more of** these substances or ~~they~~ **one or more** are of minor significance relative to the primary purpose of the product, such as a mineral or vitamin supplement.

**Model Bills and Regulations Committee Recommendation:** Regulation 3(a)(4)(XII)(c) CLARIFICATION - Regulation 3(a)(4)(XII)(c) Guarantees for crude protein, crude fat, ~~and~~ or crude fiber are not required when the commercial feed is intended for purposes other than to furnish **one or more of** these substances or ~~they~~ **one or more** are of minor significance relative to the primary purpose of the product, such as drug premixes, mineral or vitamin supplements, and molasses.

## **Model Bills and Regulations Committee E-Meeting**

October 25–30, 2019

### **Committee Recommendations**

The Model Bills and Regulations Committee recommends the following revision be made to the Model Bills and Regulations, and that the AAFCO Board of Directors review the proposed revisions for future consideration by the Association membership.

Revise Regulation 4(g) and (h) within the Model Regulations under the Model Bill as indicated in the Attachment

### **Board Recommendations**

Report accepted on November 21, 2019.

Board accepted revisions to 4(g) and 4(h).

### **Association Actions: None**

### **Committee Report**

A concern expressed by Leah Wilkinson, AFIA, at the Louisville MBRC meeting that revisions to Model Regulation 4(g) – Expression of Guarantees for Microorganisms and Enzymes approved by the AAFCO membership during the Louisville Annual Meeting Association Business Session could cause the industry to incur significant relabeling costs.

In response, Chairman Lueders directed the following individuals to further evaluate the issue and report findings to the committee. Emily Bulian Helmes (chair), Jan Campbell, Leah Wilkinson, Angele Thompson, Scott Ziehr, and Padma Pillai.

Emily Bulian Helmes submitted the working group minutes and recommendation on October 16, 2019 **(see Attachment)**

Model Bills and Regulations Committee Chairman Doug Lueders called the E-meeting to order at 11:28 a.m. CDT on October 25, 2019. The single item for discussion was the Microorganisms and Enzymes Expression of Guarantees working group recommendation from October 16, 2019. A motion to accept the working group report and forward their recommendation on to the Board of Directors for their consideration was made by Bob Geiger and seconded by Richard Ten Eyck. E-voting was commenced at 9:12 p.m. October 25 and results would be tabulated when Chairman Lueders returned to his office the following week.

Results of the votes are; Aye, Bob Geiger, Richard Ten Eyck, Kristen Green, Darrell Johnson, George Ferguson, Ben Jones and Ken Bowers. Not voting were William Burkholder, Eric Nelson, Mike Davidson, and Austin Therrell. There were no Nay votes. Chairman Lueders did not have to cast a deciding vote. The motion carried by a count of 7 out of 12.

### **Adjournment**

There was no other business. Chairman Lueders adjourned the E-meeting with the announcement of the passing vote count at 8:24 a.m. October 30, 2019.

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

## Attachment for October 25–30, 2019, E-Meeting

### Memorandum

Date: 16 October 2019  
To: Doug Lueders, Chair Model Bill and Regulations Committee (MBRC), AAFCO  
From: Emily Bulian Helmes, MBRC Work Group (WG) Leader (ETA)  
Cc: Padma Pillai (FDA); Jan Campbell (NGFA); Leah Wilkinson (AFIA); Angele Thompson (PFI)  
Subject: Regulation 4 Expression of guarantees regarding (g) Microorganisms and (h) Enzymes

The MBRC WG met on October 8 to discuss the editorial changes needed to Regulation 4, Expression of Guarantees (g) and (h). The outcomes of this meeting were:

1. The WG was aligned on the modified language for Model Regulation 4 – Expression of Guarantees for Microorganisms and Enzymes (see below version), subject to concurrence from ETA and AFIA members, which was received on October 16.
2. The WG agreed on the following path forward regarding resolution of the Industry-expressed concern over potentially misleading language approved by the AAFCO Membership in August 2019 regarding Expression of Guarantees for Direct-Fed Microorganism products:
  - a. Contact Doug Lueders to find out whether or not the AAFCO By-Laws would permit the below MBRC WG recommended Regulation 4 Editorial Changes to be moved forward for consideration by the AAFCO Board without a vote by the MBRC.
  - b. In the event that the AAFCO MBRC must vote and approve of this Editorial Change, the WG recommends:
    - i. Requesting that Chair Lueders request that MBRC members be contacted and that an electronic vote be made by Nov 15 to approve this Editorial Change to Regulation 4 Expression of Guarantees. This would enable the editorial change to be voted on by the AAFCO Membership at the Jan 2020 AAFCO Board Meeting. By so doing, the electronic OP would be updated early in 2020 to reflect the corrected language, even though the 2020 AAFCO OP in print would include the potentially misleading language.
    - ii. Request Chair Lueders ask the AAFCO Board for help to encourage AAFCO Members to use regulatory discretion as regards the language in the print version of the 2020 AAFCO OP. FDA permits guarantees of microorganism content be labeled based on total microorganism CFU/g (or CFU/lb) and does not require guarantees by each species, as may be inferred from the approved language. In the edited language (below), both approaches to guaranteeing microorganism content are permitted.

### **10/16/2019 MBRC WG Recommended Editorial Changes to AAFCO Model Regulation 4 Expression of guarantees regarding (g) Microorganisms and (h) Enzymes**

#### Regulation 4. Expression of guarantees

- (g) Guarantees for microorganisms shall be stated and conform to the following:
  - (1) Colony forming units per gram (CFU/g) or per pound (CFU/lb.) consistent with the directions for use, or CFU per product unit (e.g., tablets, capsules, liquids) consistent with directions for use and the quantity statement.
  - (2) A parenthetical statement following the guarantee shall list each species in order of predominance.
- (h) Guarantees for enzymes shall be stated and conform to the following:
  - (1) Units of enzymatic activity per unit weight or volume consistent with the directions for use, or Units of enzymatic activity per product unit (e.g., tablets, capsules) consistent with the directions for use and the quantity statement.
  - (2) 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.

**Pet Food Committee Report**  
2019 AAFCO Annual Meeting  
August 6, 9:30 am–12:00 pm, Louisville, Kentucky

**Committee Recommendations:** None

**Board Recommendations:** Report accepted October 17, 2019

**Association Actions:** None

**Committee Participants**

**Members Present:** Lizette Beckman (Co-Chair, WA), Jason Schmidt (Co-Chair, LA), Caitlin Price ((NC), Austin Therrell (SC), JoLynn Otero (NM), Katie Simpson (IN), Stan Cook (MO), James Embry (TX), Kristen Green (KY), Richard Ten Eyck (OR), Eric Nelson (FDA), Sue Hays (AAFCO Executive Director), Charlotte Conway (FDA), George Ferguson (NC – call in), Bill Burkholder (FDA – call in)

**Advisors Present:** Angele Thompson (PFI), Dave Dzanis (APPA), BC Henschen (AFTP), Cathy Alinovi (NGPFMA), James Emerson (US Poultry), Pat Tovey (PFI), David Fairfield (NGFA), Bill Bookout (NASC), Louise Calderwood (AFIA), Pam Kauffman (AFIA), David Meeker (NRA), Jean Hofve (PWA – call in), Mollie Morrisette (PP – call in).

**Committee Report**

Meeting called to order at 9:00 am EST

**Announcements**

AAFCO will be manning a booth at the 2020 Pet Food Forum. A one day pet food workshop will be held immediately after the forum concludes.

**Committee Activities**

MOTION: Accept the proposed changes to PF3 and PF5 as outlined in the 95% claims document and refer them to the Model Bill and Regulations Committee. Moved by James Embry and Seconded by Austin Therrell. At the end of the discussion of this item, both the motion and second was WITHDRAWN by James and Austin.

**Committee Minutes**

Human grade Working Group – Caitlin Price, NC.

This workgroup has been meeting regularly and is close to finalizing a draft policy. At this time, they are requesting feedback from government and industry stakeholders via a questionnaire to finish this work. Questions are posted in the Feed BIN for access by all of AAFCO. WG Chair anticipates that draft language will be available to the PFC at the 2020 Mid-Year meeting.

Update from the Pet Food Forum – Stan Cook, MO.

Sue Hays gave a presentation on the ingredient definition process during the forum. AAFCO manned a booth during the forum that garnered considerable foot traffic. Since this was a different audience from the usual AAFCO meetings, lots of questions were asked. This was a great outreach opportunity for AAFCO and opportunity to get AAFCO's name out there.

Update on the Pet Food Forum Workshop – Katie Simpson, IN.

This one day workshop had approximately 150 attendees. A lot of information was delivered in a short amount of time. A demonstration of the new ODI was delivered to participants at the end of the workshop. This workshop generated more than 250 questions. These could not be answered in the time allotted to the workshop presenters. The committee chairs are working on a communications package to answer those questions. The workgroup was not disbanded and Katie has volunteered to chair the 2020 PFF Workshop working group again.

Reviewing AAFCO Feeding Protocols – Dr. Bill Burkholder, FDA-CVM.

Dr. Burkholder was unable to make the meeting but sent in a PDF containing updated language for this topic. This PDF will be uploaded into the Feed BIN for comment by the entire PFC. An e-vote will be held before the October board meeting on the proposed changes.

95% Claims review of public comment – James Embry, TX.

During discussion of this topic, there emerged confusion amongst stakeholders about the changes to PF3. The workgroup report was confined to the portion of PF3 that was under scrutiny and contained altered language. It was decided during the discussion to divide the report into separate PDFs for PF3



and PF5 for consideration. Additionally, PF3 should be listed in its entirety for consideration. These PDFs will be uploaded into the Feed BIN for comment by the entire PFC. An e-vote will be held before the October board meeting on the proposed changes to these regulations.

Discussion of Veterinarian Directed Therapeutic Pet Foods – Louise Calderwood, AFIA.

A PowerPoint presentation was displayed that concisely illustrated the issues that have surfaced surrounding the Vet Diets. The presentation sparked discussion about how to proceed. It was unclear whether an SUIP would suffice or PF12 should be developed in this situation. Austin Therrell agreed to chair a working group to develop a survey to assess stakeholders' stance on this topic.

NCWM Quantity Statement update – Pat Tovey, PFI, Lizette Beckman, WA, & Jason Schmidt, LA.

Pat Tovey updated the room on the continued work at the NCWM summer meeting. During that meeting, the NCWM agreed to extend the enforcement date for this rule change to January of 2022. A working group was formed just prior to this meeting. Its charge was to examine the existing regulations pertaining to this issue, try to find some common ground and, then, to write and submit a NCWM Form 15 by the August 15<sup>th</sup> deadline.

Pet Food Label Modernization Discussion / Consumer Research – Sue Hays, AAFCO Executive Director, & Nancy Weinstein, Weinstein & Assoc.

The label modernization work 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).

This past spring, the PFLM teams began work with Nancy Weinstein (Weinstein & Assoc.) to conduct consumer market research on the concepts under development by the four PFLM teams. Teams worked closely with Nancy & Emily to develop a screener, discussion guide and mock labels for this research. In June, 4 cohorts were assembled and a guided discussion of the label elements was held. Nancy offered the results of this consumer market research in a PowerPoint presentation to the committee. Afterwards, the floor was opened for comments. Comments were generally positive.

Pet Food Committee adjourned at 11:55 am EST.

## Proficiency Testing Program Committee Report

2019 AAFCO Annual Meeting  
August 5, 1:30–5:30 pm, Louisville, Kentucky

**Committee Recommendations:** None

**Board Recommendations:** Report accepted on November 21, 2019

**Association Actions:** None

### Committee Participants

**Members Present:** Brenda Snodgrass – OK (Chair/Program Manager); Louise Ogden – PT Program (Vice-chair/Quality Manager); Nancy Thiex – PT Program; Bob Kieffer – PT Program; Amy Kieffer – PT Program; Ametra Berry – GA; Deepika Curole – LA; Teresa Grant – NC; Tai Ha – NE; Quintin Muenks – MO; Kristi McCallum – CO; Patty Lucas – FL; Michele Swarbrick – MN; Manisha Das – FDA/CVM; Victoria Watkins – KS; Sharon Webb – KY

**Advisors Present:** Lars Reimann – AFIA; Ken Riter – PFI

### Committee Report

#### Committee Activities

Add shipping fees to Quality Reference Material (QRM) orders; US Domestic \$5 per order, Canada \$20 per order, International \$40 per order; Non-US buyers have option to use their pre-paid courier account. Sharon Webb **MOTION**; Teresa Grant **SECONDS**; **MOTION CARRIES**.

#### Committee Minutes

Brenda Snodgrass called the meeting to order at 1:30 pm. The amended agenda was reviewed and approved. Attendees introduced themselves and their affiliations. A sign-in sheet was circulated to the attendees.

Program Leadership and Administrative Updates (Ogden)

ISO 17043 Accreditation Status (Ogden) – The ANAB completed the on-site renewal assessment on February 12-14, 2019. The assessment found no deficiencies, and all four PT schemes were renewed until March 29, 2021.

Overview of ISO 17034 General requirements for the competence of reference material producers (Ogden) - A GAP Analysis with ISO 17043 found a significant investment in additional resources would be required (man-hours, product testing, storage requirements, and finances). The committee decided not to pursue ISO 17034 accreditation at this time.

Customer Surveys (Ogden) – Presented results of 2019 Minerals Scheme (*AAFCO PT Program Minerals Survey 2019*). The planned survey for 2020 will be on the Animal Feed Scheme. Attendees were asked to provide suggestions for drugs/medicants for future rounds at the meeting or by email. None were made or submitted.

Continuity of Operations (Snodgrass)

L. Ogden's contract as the PT Program Quality Manager ends on December 31, 2020. Once contract period has passed, Louise will assist with the transition to her replacement on a month-to-month basis at the same contracted rates. The Program personnel will work with the AAFCO Board of Directors to identify a person to replace Louise

A. Crawford plans to continue as the Program Statistician for ~ 3 to 5 years. In the interim, Andy plans to assist with evaluating commercial PT statistical software, currently identified as Quo Data PROLab, which meets the ISO 17034 accreditation requirements. Several domestic or international PT programs use, and/or recommend this software, including the US FDA, European Commission, United Kingdom, Germany, Norway, Saudi Arabia, Serbia, and India.

B and A. Kieffer plan to continue providing preparation, distribution, retention, and disposal services at Able Labs for the near future. Upon their retirement, the Kieffers' daughter will operate Able Labs.

Quality Reference Materials & Shipping Updates (B. Kieffer)

Presentation (*QRM Sales & Shipping Data July 2019*) and discussion: Overseas orders are costly for the Program because not only are the rates higher, but Customs Document Package must be included. Something similar is used in the Magruder (Plant Food) PT Program pricing, a "flat rate" charge of \$40 to \$60 (S. Webb). AgriKing (Forage PT Program) uses international flat rate too,

\$20 for Canada and \$40 for Other International (J. Horst). FASS IT can easily add single price points based on destination to the QRM Online Order webpage. Missing or damaged shipments will not incur another charge when a replacement is shipped.

Sharon Webb **MOTION** to use Single Price Point for QRM shipping charges effective January 1, 2020. Rates are US domestic = \$5, Canada = \$20, International = \$40; Teresa Grant **SECONDS; MOTION CARRIES**.

Import issues are still problematic; varies widely from country-to-country, and Program is seeing some increase in retained/rejected/quarantined shipments. Mode of shipping (postal or courier) does affect customs clearance, but is not predictable. Participants, especially newer ones, do request export/import &/or phyto-sanitary permits/certificates when their country's customs hold the shipment. There is no provision in the US regulations for such permits or certificates for PT materials. Effective in the 2020 Program Year, we will notify participants that all REQUIRED customs permits and certificates for their country are the responsibility of the participating lab. The Program will continue to provide the Customs Cover Letter, Ingredients List, and Value Declaration (Invoice) with all non-US shipments.

#### Schemes Discussion (Ogden)

Canned Pet Food Add-on will be available in 2020 to ~ 30 US participants of the Animal Feed and/or Pet Food Ingredient Schemes. The product will only be available by case; cost estimate is \$80 per case. The participants (already identified) may order more than one (1) case.

2020 Planning for new matrices, drugs, ingredients, and analytes. Attendees identified and discussed:

Sweet horse feed with molasses; high molasses feeds have historically been difficult to grind. Able Labs will try a test preparation, or sample will ship unground following uniform splitting.

Monensin only in feed ration without other drugs or drug residues

Non-protein Nitrogen (NPN) – Make sure it is prominent on the bag label. Important participants know to report “as % Nitrogen”

Additional participant's requests may be emailed to [pt@aafco.org](mailto:pt@aafco.org)

Mycotoxin Scheme final report still contains a disclaimer “for Research only”. Now that the Scheme is accredited, the disclaimer has been removed.

#### Sampling PT Pilot Study (Thiex)

Presentation (*Sampling Pilot Study*); Lab Sampling Working Group plans to ship an unground sample to ~10 labs. Nancy requested suggestions for returning test portions back to her for distribution to volunteer testing labs. Attendees discussed the possibility of characterizing particle sizes in the Pilot. Particle size analysis may require additional testing and would likely require a funding stream. Webb stated the Pilot Study had potential to scale up for a PT Scheme for AAFCO. Tentatively expect to report results of the Pilot Study at the 2020 Mid-year AAFCO Meeting.

#### Official Publication Analytical Variances Update (Snodgrass)

Presentation (AAFCO PTP AV WG Update - Aug 2019); AAFCO Vision and Mission were reviewed along with the Work Group (WG) charge. Results from a recent survey of State Feed Program Managers collected by Steve Stewart (MN) was presented along with comments from the survey respondents. Attendees discussed the timing for including other AAFCO Committees and public stakeholders. The WG will remain small until the Program history and proposed replacement model/calculations are completed by the WG. At that time, Brenda will request liaisons join the WG from the Enforcement Issues and Inspection and Sampling Committees. Discussed adding consumers using feed and pet food. Brenda expects stakeholder discussions will involve veterinary medicine and nutritionist associations' representatives, as needed, once the WG & Committee Liaisons complete the Technical Report, and prepare the Board recommendation(s).

Ad Hoc Presentation on Metamer pC (Paul Wehling, Medallion Labs) AOAC is moving beyond the Horowitz and using the Metamer pC (log10) approach. Paul is doing a presentation on the new statistical evaluation at the 2019 Annual AOAC Meeting in September.

WG Members are Snodgrass, Thiex, Koestner, Sheridan, Reimann, and Riter.

References:

[AOAC OMA Appendix F – includes Standard Method Performance Requirements / Horowitz \(HORAT\) in Annex D](http://www.eoma.aoc.org/app_f.pdf) [http://www.eoma.aoc.org/app\\_f.pdf](http://www.eoma.aoc.org/app_f.pdf)

Meeting adjourned at 5:00 pm.

### Action Item Table

Responsible	Item	Action	Timing / Status
Committee Chair (Program Manager) & AV WG Volunteers	Analytical Variations from Official Publication	Internal Report on AV misuse, obsolescence, and proposed replacement/guidance.	August 2020 / In Progress
Committee Chair (Program Manager) and Vice-Chair (Program Quality Manager) & Pet Food Industry Volunteers	Canned Pet Food Add-on	Source canned pet food material (dog) for inclusion in 2020 Program Year.	By November 2020 / In Progress
Committee Chair & Vice-chair/ FASS IT	Add shipping fees to Quality Reference Material (QRM) orders	US Domestic \$5 per order, Canada \$20 per order, International \$40 per order; Non-US buyers have option to use their pre-paid courier account.	January 1, 2020 / Pending

### Meeting Attendees

First	Last	Affiliation
Josh	Arbaugh	WV Dept. of Ag
BJ	Bench	Tyson Foods, Inc.
Ametra	Berry	GA Dept. of Ag
Jordon	Bierbaum	Trilogy Analytical Lab
Elizabeth	Bowles	MD Dept. of Ag-Feed Lab
Scott	Boone	MS State Chemical Lab
Ann	Case	IFF
Deepika	Curole	LSU Dept. of Ag. Chem.
Manisha	Das	FDA/CVM
Russ	Davis	FDA
Evanka	Downs	Outward Hound
Tracye	Edwards	Eurofins FII
Bridgett	Farrell	IFF
Sally	Flowers	NE Dept. of Ag
Teresa	Grant	NC Dept. of Ag & APHL Liaison
Tai	Ha	NE Dept. of Ag
Philip	Hamlow	Eurofins Food Integrity
Josh	Henderson	Wilbur-Ellis
William	Hoek	NYS Food Lab - Dept. of Ag & Marketing
Jeff	Horst	Agri-King
Alexis	Huyghues-Despointes	J. M. Smucker
Dorota	Inerowic	OISC
Robin	Johnson	Montana Dept. of Ag
Soloman	Kariuki	UK Div. of Reg. Serv.
Chelsea	Kent	NGPFMA
Bob	Kieffer	Able Labs
Amy	Kieffer	Able Labs
Mary	Koestner	MO. Dept. of Ag
Dominika	Kondratko	CO Dept. of Ag
Mark	LaBlanc	LA Dept. of Ag
Stan	Lantz	NM Dept. of Ag
Joyce	Lewis	LA Dept. of Ag & Forestry
Justin	Lontz	DE Dept. of Agriculture
Juan	Lopez	FDA
Patty	Lucas	FL Dept. of Ag. & Cons. Serv.
Vanesa	Mendez	Randox Food Diagnostic
Melissa	Nichols	MO Dept. of Ag
David	Nobo	KS Dept. of Ag
Samuel	Nobo	KS Dept. of Ag
Louise	Ogden	Life Member
Greg	Olson	LDAF Ag Chemistry

<b>First</b>	<b>Last</b>	<b>Affiliation</b>
Victoria	Owens	AL Dept. of Ag & Industries
Stephanie	Peterson	Midwest Labs
Lars	Reimann	Eurofins
Ken L.	Riter	Nestle Purina Analytical Labs
Lisa	Ruiz	Eurofins
Yvonne	Salfinger	APHL
Leo	Schilling	Eurofins
Briana	Schuld	Eurofins Nutritional Analysis Center - MAC
Carrie	Schultz	Nutra Blend
Liberty	Sibanda	Randox Food Diagnostic
Lauren	Smith	UK Div. of Reg. Serv.
Brenda	Snodgrass	OK Dept. of Ag
Taylor	Stadler	Covance Food Solution
Michele	Swarbrick	MN Dept. of Agriculture
Nancy	Thiex	Life Member
Scott	Tilton	Flint Hills Resources
Thomas	Trupo	WV Dept. of Ag
Victoria	Watkins	KS Dept. of Ag
Sharon	Webb, Ph.D.	UK Div. of Reg. Serv.
Paul	Wehling	Medallion Labs
Mikel	Wright	FDA
Dancia	Wu	OISC
Kate	Wu	AL Dept. of Ag & Industries
Yan	Zhang	National Corn-to-Ethanol Research Center

**Strategic Affairs Committee Report**  
2019 AAFCO Annual Meeting  
August 7, 10:15 am–12:00 pm, Louisville, Kentucky

**Committee Recommendations**

- Report acceptance.
- Recommend
  - that Chairs and Investigators sign AAFCO's Conflict of Interest
  - amending the Procedures Manual (page 8):  
Conflict of Interest  
The members of the Board and all AAFCO members/volunteers have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. AAFCO Board members, employees, Committee Chairs, and AAFCO Investigators will sign the Association of American Feed Control Officials Conflict of Interest Disclosure Statement annually that affirms such person:
    - i. Has received a copy of the conflict of interest policy,
    - ii. Has read and understands the policy, and
    - iii. Has agreed to comply with the policy.
  - Correcting grammatical errors in Subcommittee definition (OP Page 102 and Procedures Manual page 14) text submitted January 2019:  
Subcommittees – Are made up of committee members and are “task/topic specific” (e.g., By-Laws Subcommittee of Strategic Affairs), used to divide responsibilities, or focus work, into more manageable groups of interest or expertise. Subcommittees do not generally have time restrictions imposed on their existence, and **work tends to be a subset of the standing committee charge(s)**. Subcommittees may be created by a committee chair, as needed, to **support** ~~address the needs on the~~ committee function.

**Board Recommendations:** Report accepted October 17, 2019

**Association Actions:** None

**Committee Participants**

Linda Morrison, Stan Cook, Nancy Thiex, Dragan Momcilovic, **Dan Danielson**, Erin Bubb, **Jamey Johnson**, Doug Lueders, Shannon Jordre, **Ken Bowers**, **Chad Linton**, **Mark LeBlanc**, Jenny Murphy, **Kent Kitade**, Andy Gray, **Ali Kashani** (Board Liaison), **Brenda Snodgrass**, **Richard Ten Eyck** (BIN Coach), **Scott Ziehr**

Robert Waltz, Vice Chairperson

**By-Laws Sub-Committee**

**Ken Bowers**, Erin Bubb, **Doug Lueders**, **Richard Ten Eyck**

**Committee Advisors**

**Dave Fairfield**, **Dave Dzanis**, Bob Ehart, **Leah Wilkinson**, **Nancy K. Cook**, Kristi Krafka, Julia Fidenzio

**\*Members in bold were present.**

**Committee Report**

1. Sub-Committee: By-Laws Update (Ken)
  - Accept Sub-Committee report (Appendix 1)  
**Motion** to accept Sub-Committee report - Ken; **second** - Doug; **MOTION CARRIES**.
  - a. Recommend AAFCO Conflict of Interest (COI) sign off for Chairs and Investigators.
    - FDA would rely on their own COI and would not sign one for AAFCO
    - Motion** that Chairs and Investigators sign AAFCO's Conflict of Interest - Doug; **second** - Mark ; **MOTION CARRIES**.
  - b. Recommend edits to Procedures Manual page 8 regarding COI.  
**Motion** to amend the Procedures Manual (page 8) (per below) - Ken; **second** - Mark; **MOTION CARRIES**.  
“Conflict of Interest

The members of the Board and all AAFCO members/volunteers have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. AAFCO Board members, employees, Committee Chairs, and AAFCO Investigators will sign the Association of American Feed Control Officials Conflict of Interest Disclosure Statement annually that affirms such person:

- i. Has received a copy of the conflict of interest policy,
  - ii. Has read and understands the policy, and
  - iii. Has agreed to comply with the policy.”
- c. Recommend contractors sign a uniform disclosure statement (if there is a perceived conflict of interest) within the contract with AAFCO.
    - Good policy to have for future contractors; should be in any contract with service provider
    - Note there is a difference between a vendor and contractor; if vendor just sells product (to specifications) versus provides service; case dependent that needs to be considered
- Table (January 2019) **Motion** to add “contractors” to those who have to sign COI - Stan; **second** - Richard; Doug motion to remove from table; Ken seconds; **MOTION FAILS**. **ACTION:** return to By-Laws to address COI versus disclosure/non-disclosure terminology for contracts. Investigate if and when these conditions should be used for vendors. Draft language for Procedures Manual as appropriate.
- d. Recommend further subcommittee discussion on establishing language in the bylaws to describe the executive committee authority and membership. By-laws Article IV.
    - Informal executive group currently functions; could be subject to challenge
    - Now that there is an ED, should there be consideration to include on executive committee
    - If By-Laws amendment recommended, confirm with legal
    - Consider who and what executive group does and bring back
  - e. Recommend leaving BOD quorum language as-is for now until after discussion on executive group.
  - f. Recommend leaving committee advisor language as-is and not changing to appointed advisors.
    - Committee agreement
  - g. Recommend discussion in SAC regarding whether AAFCO board can kill a committee recommendation (By-Laws, Article VII)? Can the BOD amend a committee recommendation?
    - Checks and balances currently exist
    - Procedure exists for Board to communicate issues/conflict to member to inform membership vote
    - Opinion that BOD can review but not kill/amend; BOD issue would be conveyed via their recommendation
    - Can Board send it back to Committee? Historically items have routinely been returned (or referred to another Committee) if Board feels additional work is needed
    - The Board receives a report that they may not accept. If so, it gets returned to the committee for clarification/additional work etc.
    - The Association has processes in place to ensure communications between the Board and Committees, including timelines for submission of reports. If timelines are not adequate they should be reconsidered. Similarly, if the processes are not functioning, they should be reviewed. Is an evaluation necessary? Consider legal confirmation relative to By-Laws as necessary.

**ACTION** By-Laws will further investigate. Once the process is clarified (By-Laws adjusted), committee recommendations should proceed as indicated in the By-Laws.

## 2. Strategic Planning 2017-20

- Key progress has been recorded in Appendix 3: Strategic Plan 2017-2020 updates from Annual 2019. Edits are in bold-italic text. Progress will be tracked via Appendix 3; the Feed BIN project tracking will no longer be used due to limits reflecting details.

- The Board decided to action the fourth priority goal and identified a fifth. Key activities for both were drafted by the Board and Chairs at the beginning of Midyear and were finalized shortly thereafter Midyear. It was distributed to relevant chairs to incorporate in committee activities.
  - CIOC has lead responsibility for almost all of the new activities. Since there are new vice-Chairs, they will need some time to get this work planned and begin to action.
3. Strategic Planning 2021-24
- The Board will begin revising the Strategic Plan Goals for 2021-24, at the fall meeting October 2019. Priority goals will also be identified.
  - Activities, deliverables and responsibilities will be developed by the Board/Chairs at Seminar 2020.
  - Priority goals and activities will be finalized for presentation for member acceptance at Annual 2020 so implementation can begin in 2021.
4. Procedures Manual (Appendix 2)
- Edit to Travel Procedures
    - Discussion points from Richard (italic and bold text in Appendix 2)
  - Executive Director
    - Insert only addresses evaluation; suggestion from Linda to add section describing Executive Director and duties/relationship with AAFCO
    - Noted that the Association Management Firm is not described either - should it be?
- ACTION** - Consult with Board about making additional edits.
5. Subcommittee definition (OP Page 102 and Procedures Manual page 14)
- A grammatical issue was noted in the text just approved at General Session Annual 2019:
 

Subcommittees – Are made up of committee members and are “task/topic specific” (e.g., By-Laws Subcommittee of Strategic Affairs), used to divide responsibilities, or focus work, into more manageable groups of interest or expertise. Subcommittees do not generally have time restrictions imposed on their existence, and **work tends to be a** subset of **the standing committee charge(s)**. Subcommittees may be created by a committee chair, as needed, to **support address the needs on the** committee function.
- ACTION** - Make grammatical edits and forward to Board for text correction.
6. Independent Conclusion of GRAS program
- WG (under IDC) Charge: to identify and pursue state acceptable alternatives to CVM review of independent GRAS conclusions. WG Goal: to develop an animal food ingredient review system for independent conclusions of GRAS that is acceptable to all AAFCO member states.
  - Board Charge to SAC: consider whether this is the direction that AAFCO wants to go.
  - Industry questions whether this will be widely used since it does not include FDA.
  - Ingredient accepted through this process would not be in OP (because of MOU).
  - Member comments questioning whether AAFCO should proceed.
  - Should AAFCO be doing this (even though states may accept).
  - Members were surveyed (July 2016) - ~75% positive depending on verifier (RT to confirm); RT can locate (include highlights in SAC);
- ACTION:** Redo survey with updated questions to add to conversation and confirm continued work on ICG.

**eMotion** September 17, 2019: To accept the meeting minutes/report - Ken; **Second** - Bob; **MOTION CARRIES**.

**Action Item Table**

Responsible	Item	Action	Timing / Status
By-Laws (Ken)	AAFCO Conflict of Interest (COI) sign off for Chairs and Investigators	Follow up: 1. Suggestion that individual states that adjust their COI to include AAFCO could be used in lieu of the AAFCO COI. Committee commented that COI is different when acting on behalf of AAFCO versus conducting regulatory activities for a state. As well, this places additional work on AAFCO, including legal review. By-Laws will continue deliberation.	1. Complete



Responsible	Item	Action	Timing / Status
		2. Consider how contractors and contractual employees should be covered with COI provisions. AAFCO currently has a number of contractual agreements. Alternative is to ensure uniform disclosure statement in contracts in lieu. Group to include Susan.	2. January 2020
By-Laws (Ken)	Board Executive and Board quorum/voting provisions	Consider defining executive group. Review Board quorum/voting giving change in number of Directors. Instead of majority, also consider "simple majority".	January 2020
By-Laws (Ken)	Advisor language	Consider using "appointed" advisors instead of "committee" advisor in procedures manual references and in OP.	Completed
By-Laws (Ken)	By-Laws authority regarding Committee recommendations	Investigate whether AAFCO board can kill/amend a committee recommendation (By-Laws, Article VII)	January 2020
Strategic Affairs (Linda)	Procedures Manual	Consult with Board about making additional edits to the Procedures Manual regarding to travel procedures and Executive Director duties	January 2020
SAC and IDC (Linda and Richard)	Independent Conclusion of GRAS program	Redo survey with updated questions to add to conversation and confirm continued work on ICG	January 2020

## **Appendix 1: By-Law Subcommittee Report 05/30/19**

### **Subcommittee Recommendations to SAC:**

- 1) Recommend AAFCO Conflict of Interest (COI) sign off for Chairs and Investigators.
- 2) Recommend edits to Procedures Manual page 8 regarding COI. See Attachment A
- 3) Recommend contractors sign a uniform disclosure statement within the contract with AAFCO.
- 4) Recommend further Subcommittee discussion on establishing language in the bylaws to describe the executive committee authority and membership. By-laws Article IV.
- 5) Recommend leaving BOD quorum language as-is for now until after discussion on executive committee.
- 6) Recommend leaving committee advisor language as-is and not changing to appointed advisors.
- 7) Recommend discussion in SAC regarding whether AAFCO board can kill a committee recommendation? Can the BOD amend a committee recommendation?

### **Subcommittee Participants present during call on 05/30/19:**

Erin Bubb – PA, Richard Ten Eyck – OR, Ken Bowers – KS.

Doug Lueders – MN absent

The by-law sub-committee discussed the AAFCO Conflict of Interest (COI) sign off for Chairs and Investigators. It was decided to recommend that committee chairs and investigators sign the COI. When on an AAFCO committee with governing board-delegated powers or serving as an investigator the person is representing AAFCO.

Also discussed whether By-laws Article IV is clear enough regarding executive committee authority and membership. This discussion also relates to the Quorum discussion.

Discussed board actions available on committee recommendations. Discussed possible fix to adoption of the "Guidelines for requesting a new definition" as recommended by the IDC.

By Law committee does not think proposed language in new guidelines violates the bylaws but that the process could be clearer.

Proposed Language:

"Once accepted by membership for publication as a tentative definition the definition will move to Official status six months later without further action by the IDC, Board or Membership. This action can be stopped or modified by the IDC in consultation with the investigator."

RT will draft amendment language for the BOD to offer on the "Guidelines for requesting a new definition" document. Erin will request it get on BOD agenda for June.

Call was adjourned about 90 minutes in.

## **Attachment A**

Procedures Manual page 8

Insert language to read:

Conflict of Interest

The members of the Board and all AAFCO members/volunteers have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. AAFCO Board members, employees, Committee Chairs, and AAFCO Investigators will sign the Association of American Feed Control Officials Conflict of Interest Disclosure Statement annually that affirms such person:

- i. Has received a copy of the conflict of interest policy,
- ii. Has read and understands the policy, and
- iii. Has agreed to comply with the policy.

## Appendix 2: Travel Procedures

### Travel Procedures

AAFCO realizes the importance of having effective meetings and this requires committee chairs, investigators, members of the BOD and others to attend. However, sometimes persons serving in these positions are unable to attend meetings without outside financial assistance because of a lack of available travel funds in their agency. AAFCO has a long tradition of assisting control officials, to the extent possible, in attending meetings when it is deemed to be in the best interest of AAFCO to do so.

A control official should request funds for travel from AAFCO only if their agency is unable to provide funds for travel. The official should seek partial travel funds from their agency. Additionally, when requesting AAFCO travel funds, the official should minimize expenses.

### Authorization Procedures

- The President is responsible for approving all travel requests. The President may consult with the BOD as necessary or advisable. **In the case of the President's travel, the President Elect is responsible for approving the President's request.**
- All travel requests must be submitted to the AAFCO President and Association Management Firm on the Travel Request Form well in advance of the meeting. The Form can be obtained from the AAFCO website or Association Management Firm. Approval must be obtained before the travel begins.
- Committee chairs and BOD members may make their requests directly to the President.
- Committee members must first submit their requests through their committee chair, who must approve the travel before forwarding the request to the President.
- The chair should justify the requests by explaining why the member's presence is in the best interest of AAFCO.
- Travel advances, *mainly to cover transportation*, are available upon request **and approval. Do we want to capture the Airfare purchase policy here (*italics*)?**
- The President shall *promptly approve or deny* all requests and send a copy to the person requesting approval, the committee chair (if appropriate), and the Association Management Firm. A copy is to be attached to AAFCO Expense Travel Vouchers after the approved travel has been completed. **A specific timeline should be stated for the President's approval. 5 business days (*italics*)? Agree**
- **The person who will be President at the calendar time of travel is responsible for approving the requests and reimbursements. The current President Elect will be responsible for approving proposed travel that takes place during their term as President. Needs rework current does within their year, in consultation with incoming**

### Allowances and Receipts

- Room costs will be reimbursed on an actual-cost basis. A receipt is required.
- Food **and incidentals**, including tips, will be ~~based reimbursed on an actual cost basis, itemized by meal each day or using~~ **on the current U.S. federal per diem rate for meals and incidentals.**
- Automobile travel will be reimbursed at the **current** U.S. federal rate. The claim should show origin and destination points and total mileage. If automobile instead of air travel is chosen, then the less expensive mode of transportation will be reimbursed.
- Airfare should be the lowest available, which may require advance purchase, ***staying over Saturday night??***, economy fare or other restrictions. A receipt is required.
- Taxi, limousine, **Uber, Lyft** or other transportation will be reimbursed at actual cost. A receipt is required. **Gratuities must be documented. Receipts are required if over \$15.** Separate justification must be made for rental cars **and preapproved.**
- Registration fees are refunded as charged. A receipt is required.
- Other expenses on behalf of AAFCO may be considered for payment. In these cases receipts and justification must be provided.

### Travel Expense Claims

- A properly completed Travel Expense Form must be submitted to the President and Association Management Firm, along with all appropriate receipts as previously outlined. The Form can be obtained from the AAFCO website or Association Management Firm. **In case of presidential travel, the President Elect will approve reimbursements.**
- All requests for reimbursement must be made within 30 days of travel completion. **(If the request cannot be filed by then, the traveler may seek in writing, an extension from the President).**

- The President shall check the voucher and receipts and compare to the travel request to ensure accuracy and appropriateness. Upon approval, the President shall ~~sign the travel expense voucher and send the original with receipts~~ **(promptly notify)** to the Association Management Firm **(that the travel request is approved for payment). Notify traveler and Association Management. Specify number of business days. 10 (italics)? agree**
- The Association Management Firm shall promptly issue a payment to the member to reimburse the approved travel expenses.
- If the member received an advance and a refund is due to AAFCO, the member shall promptly reimburse the Association.
- The Association Management Firm shall retain a copy of the approved travel expense claim and travel request.

#### General Travel Policies

- The BOD attends the AAFCO/FDA Briefing and Planning Meeting in Rockville, MD at AAFCO expense, if FDA funds are not available.
- The President or BOD may appoint members of AAFCO to represent the Association at industry, governmental and other meetings at AAFCO expense when it is deemed in the best interest of AAFCO. Likewise, the President may deny requests for reimbursement for expenses to attend any meetings for which prior approval was not given.

#### Executive Director

**Two weeks prior to the Board meeting at the seminar, the immediate Past President will put together and circulate to the Board, a review and yearly evaluation of the work completed by the Executive Director. At the seminar, the immediate Past President, President, President Elect, and Secretary/Treasurer shall meet with the Executive Director to review performance.**

**This session will be open for any Board member to attend. The time and place of the review will be announced prior to the seminar. If the Executive Director is not able to attend the seminar, the immediate Past President will solicit comments from the Board and then present the Executive Director a written review at a later date.**

**If the immediate Past President is not able to attend seminar, the President or President Elect may conduct the assessment. It will also discuss future initiatives the Board sees as valuable.**

## Appendix 3: Board/Chair Session with 2 Added Goals and Midyear 2019 Updates

Annual Meeting Update August 7, 2019

### Strategic Planning 2017-2020

Updated Goals 2017-2020	
<b>Strengthen organizational infrastructure</b>	
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
<b>Promote and enhance membership participation (internal)</b>	
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
<b>Emphasize feed and food safety</b>	
11	Continue developing member feed safety programs in alignment with FSMA and IFSS
12*	Promote and support laboratory technology, methods, quality systems and collaboration
<b>Vitalize partnerships with external stakeholders</b>	
13	Identify key stakeholders and working partners and common goals
14	Develop and maintain professional relationships with stakeholders and affiliated organizations
<b>Strengthen international presence</b>	
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

\*\* Adequate progress was made on the first three; Goal 7 was initially identified as a fourth goal. The Board/Chairs subsequently added goal 10 October 2018 - January 2019.

\*\*\* 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, and Dave Dressler

Outcome	Activity	Resources Needed	Timeline	Responsibility
<b>Strategy: Emphasize feed and food safety</b>				
<b>Goal 12: Promote and support laboratory technology, methods, quality systems and collaboration</b>				
12.1 ** 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. Will require review of the methods list together with the hazard list to reprioritize. Need to identify resources to address backlog thereafter. 3-5 years to address backlog. August 2018: Sugars and fructans methods submitted for ERP at AOAC Aug. 2018. Vitamin and Mineral group still in progress and have some funding requests. FDA hazard guidance published January 23, 2018 that was insufficient for use. <b>August 2019 Update: Hold pending hazard identification priority needs from 12.2.</b>	LMSC with ISC support
Combined with 12.3 (below)	<del>Identify resources to perform additional (field) sample collection studies</del>	<del>Funds Equipment People</del>	<del>6 months to identify resources 1 year to develop adequate protocols 3 years to perform additional sample collection studies</del>	<del>1. ISC 2. LMSC</del>
12.2 *** FSMA TF Item 3: priority setting and method development for contaminants/hazards (Combined with activity 9.2 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 assumed the work and published hazard guidance January 23, 2018. Next steps: 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: WG report - FDA guidance doesn't contain a hazard specific list or action levels. Levels are critical to inform method development. Group will deliberate refocusing to identify what can be done (e.g. identify hazards from those suggested that are higher risk (toxicity/likelihood/impact) 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). <b>August 2019 Update: Lead changing to Eric Brady who will review WG membership and reinvigorate efforts to move forward.</b>	FFIMC lead, EIC, ISC, IDC and LMSC

Outcome	Activity	Resources Needed	Timeline	Responsibility
12.3 ** Validation of sampling methods	a) Perform field sampling method validation including sampling equipment and sample type. b) Establish sampling methods needs statement ( <b>Complete</b> ). 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 <b>Complete June 2018:</b> Laboratory sampling guideline. Work group established (ISC and LMSC reps) to develop RFP. August 2018: RFP development in progress 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. RFP approved by Board December 2018 and issued. <b>August 2019 Update: 3 proposals received. Need to establish assessment criteria and evaluate. Hope to complete and select by Midyear 2020.</b>	ISC with LMSC support
12.4 ** <i>Collaboration between feed programs and laboratories that perform feed sample analysis and laboratory participation in AAFCO</i>	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). August 2018: Ongoing effort by LMSC to develop initiatives to increase collaboration. <b>Complete</b>	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
<b>Strategy: Promote and enhance membership participation (internal)</b>				
<b>Goal 9: Enhance collaboration, communication and cooperation among regulatory agencies</b>				
9.1 ** Share compliance letters/enforcement actions. Coordination of enforcement action.	<del>Categorize Listserv topics to Feed BIN</del> <i>Being done as part of Food Shield (next item)</i>	<del>Administrative support</del> <del>Feed BIN</del>	<del>Archive Listserv is searchable. Categorization of active Listserv</del> <del>North Carolina also has a "mini" Listserv. It is informal, but has national data. Membership for regulators is vetted in order to control access.</del> <i>Made a component of item below.</i>	<del>EIC to designate lead with FASS support – Jennifer</del>
	Share compliance letters and enforcement actions <b>(State and Federal)</b>	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: WG, Surveyed 700 members, 44 responded (6%) regarding needs. RFP developed and sent to 4 companies. Three responded with proposals. WG turnover necessitated change in members. George Ferguson, Erin Bubb and Richard Ten Eyck reviewed the 3 proposals and made recommendation to EIC. Food Shield proposal accepted and Board approved proceeding. Search features are being adjusted. Expect to be functional within 6 months. <b>August 2019: A demo of the final site is expected in the next 2 weeks. If all is good an announcement will be made that it is complete.</b>	EIC to designate lead with FASS support
	<del>Share Division of Animal Feed letters</del> <i>Being done as part of Food Shield (item above)</i>		<i>Made a component of item above.</i>	<del>EIC to designate lead and coordinate with FDA as necessary; FASS to support</del>
	Enforcement Issues Committee can pick up topics – coordinate and enhance committee action		No action due to lack of members willing to lead. <b>August 2019 Update: New leadership will be seeking additional members and developing ideas/suggestions for coordinated enforcement activities</b>	EIC to designate lead with FASS support – Members



Outcome	Activity	Resources Needed	Timeline	Responsibility
	Consider development of core report (similar to that of FDA) (frequency to be determined)	Listserv EIC IDC Any committee	<b>August 2019 Update: Action pending</b>	EIC to designate lead with FASS support
9.2 *** FSMA TF part of Item 3: Enforcement strategy for contaminants/ hazards (Combined with activity 12.2 in FFIMC WG)	<del>Determine the contaminants, hazards, matrix, action levels and enforcement strategy to provide guidance to LMSC to inform method development and priority setting.</del>		<del>Alliance decided not to develop specific hazard guidance information. FDA has assumed the activity; work product published January 23, 2018.</del>	FFIMC lead, EIC, ISC, IDC and LMSG
9.3 ** Enhanced use of Feed BIN	Identify activities to enhance use	Financial support	<b>Complete January 2017</b> (activities detailed in Feed BIN)	CIOC
9.4 ** 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	Grant application successful and SME identified. Framework developed and finalized late 2018. Will be tracked via grant reporting obligations. <b>Complete 2018</b>	NASDA-AAFCO-FDA FSMA Steering Committee (AAFCO reps: Linda, Ali, Bob W., Richard)
9.5 *** 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		<b>Complete January 2017</b>	MBRC
9.6 *** 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		<b>Complete August 2016</b>	a. FFIMC with MBRC and PFC b. FFIMC with OP section editor and Feed Safety Coordinator
9.7 *** 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: Revising to make generic. Ongoing activities will be part of CIOC regular work. Expect to finalize for Board/member approval January 2019. <b>August 2019 Update: New CIOC Co-Chairs identified and reinvigorating work</b>	CIOC

**Group 3: Dan Danielson, Ali Kashani, and Tim Weigner**

Outcome	Activity	Resources Needed	Timeline	Responsibility
<b>Strategy: Promote and enhance membership participation (internal)</b> <b>Goal 8: Develop and provide professional development and technical training opportunities in support of feed program</b>				
8.1 ** 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 8.1 and 8.2. Document finalized. Need mechanism to keep updated, likely via George's group. Developed training calendar in Feed BIN and been adding to calendar. Point of contact and ongoing addition - Jeff; also seeking industry input so their training can be input. WG disbanded. <b>Complete Spring 2018 See 8.2</b>	ETC together with ISC
8.2 ** 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 8.1 and 8.2. Catalogued and categorized (per vote 8.1 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. <b>Complete Spring 2018: See 8.1 In Feed BIN. WG disbanded.</b> August 2018: 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 favored 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

<b>Outcome</b>	<b>Activity</b>	<b>Resources Needed</b>	<b>Timeline</b>	<b>Responsibility</b>
8.3 ** <i>Model training framework</i>	Develop model document for joint inspection (OJT – on the job training) for feed. <del>Develop model training plan.</del> 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: 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, as well as sampling and work planning). Recommend use and revisions thereafter. Document has been shared with the Committee throughout the process. Committee approved August 2018 and Board/members accepted January 2019. <b>Complete.</b>	ETC (George F. lead) and ISC
8.4 *** 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: Eric to work with Jenny FDA to move forward with draft by January 2019. Some material was trialed at AITS, June 2019. <b>January 2019 Update: Will be adjusting BITS and AITS. Need to have formalized material completed and consider incorporating it into the inspector manual?? Timing?? - Eric/Austin/Miriam - what is the status of this?</b>	FFIMC & ISC supported by ETC
8.5 *** 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.	<b>August 2019 Update: Comprehensive review by FDA and WG with FASS formatting. Approved by ISC. Complete.</b>	ISC supported by LMSC and ETC

**\*\* Top 3 outcomes identified at May 2<sup>nd</sup>, 2016 planning session**

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

## Additional 2 Priority Goals

January 19, 2019 Participants: Bob Geiger, Kristen Green, Susan Hays, Amanda Anderson, Richard Ten Eyck, Erin Bubb, Hollis Glenn, Miriam Johnson, Dave Phillips, Kent Kitade, Stan Cook, George Ferguson, Austin Therrell, Ken Bowers, Ali Kashani, Katie Simpson, Kristie McCallum (attendees contributed to both goals)

Outcome	Activity	Resources Needed	Timeline	Responsibility
<b>Strategy: Promote and enhance membership participation (internal)</b>				
<b>Goal 7: Identify opportunities to increase member agency participation</b>				
7.1 Conduct survey of membership needs supplemented with direct communication	Develop survey to identify who (member and person) is not participating and why. Individuals to conduct direct communication are identified based on relationship. Develop talking points to support conversations (standard language, script, news/updates, specific asks (e.g. committee members), identify state specific needs). Group results by similar circumstances. Identify needs. Target inactive AFRPS states (talking points - how AAFCO supports AFRPS, offer CEU, offer AFRPS session at meetings). Develop recruiting strategies (What we can do for then and them for us), action plan and implement.	\$\$ for CEU courses, time at meetings	Active member list supplied by FASS for working group review. Report on survey results and needs. Recruiting strategy. Action Plan Implement, track and report. <b>August 2019 Update: New CIOC Co-Chairs identified and developing work plan.</b>	Board CIOC ED  CEU specific committee ETC
7.2 Mentoring	Hold new member session during meeting Follow up to encourage engagement. Regionally, active states contact inactive states with news, updates and invites. Targeted scholarships. Hold meetings in states/regions with decreased participation. Support mentorship/mentor (e.g. sub-committee) to host training/workshops		Develop list of target states and person responsible. Develop list of mentors to match with mentees. Talking points. Scholarship program. Mentoring engagement plan. Implementation tracking and reporting <b>August 2019 Update: New CIOC Co-Chairs identified and developing work plan.</b>	CIOC Board

<b>Outcome</b>	<b>Activity</b>	<b>Resources Needed</b>	<b>Timeline</b>	<b>Responsibility</b>
7.3 Provide events at Mid Year and Annual to inspire all member agencies to attend <i>and participate</i>	Events established based on membership survey and ongoing intelligence gathering. Events should consider needs of both large and small agencies (determine what these are). Design events that lead to innovation and nontraditional solutions. Increase opportunities for ideas to be heard and let them know ideas are welcome. Schedule events in the middle of the meeting versus front/back of regular meeting. Increase professionalism of meetings (Committees are prepared and actively conduct work at meetings). Offer more education/training at meeting (identify needs, consider AFRPS/new outside groups (USDA))	Speaker funding	Ongoing intelligence gathering established (e.g. post meeting evaluation, outreach to states) Needs list developed, actioned and tracked. <b>August 2019 Update: New CIOC Co-Chairs identified and developing work plan.</b>	ETC with technical support from relevant committees
7.4 Formulate and communicate positions on emerging issues (e.g., hemp, ICG) <i>(Transferred to 10.1)</i>				

Outcome	Activity	Resources Needed	Timeline	Responsibility
<b>Strategy: Promote and enhance membership participation (internal)</b>				
<b>Goal 10: Communicate and document AAFCO benefits and accomplishments</b>				
10.1 Enhance Communication tools. <i>Integrated 10.2, 10.3, 10.4 and 10.5</i>	Strengthen Current Issues and Outreach Committee Develop relevant talking points with cohesive message, not just listing top benefits of committees (ask at seminar, ask members what they think the bullet point messages should be. Formulate and communicate positions on emerging issues (e.g., hemp, ICG). Communicate benefits of AAFCO for Lab group (e.g. AAFCO support for ISO), success and relevance of proficiency testing program. Develop and publicize resolutions to support the AAFCO feed/food safety vision and goals. Collect case studies of AAFCO's successes and how they increased feed safety (e.g. BSE regs, botanicals, proficiency testing protocol ISO certification, ingredient definitions, early development of model regulations, good samples). Identify target audience, as message will vary. Identify delivery format (handout/pamphlet, newsletters, website, Feed BIN, social media) Develop schedule to keep Website content updated. Issue shorter newsletters more frequently (monthly). Maintain electronic list of upcoming meetings. Identify communication tools to utilize (dashboard, surveys). Facebook page: start with monthly newsletter, AAFCO press releases (increased frequency), communicates big items (consider activist comments). Consider having FASS post, someone else puts together content/format and review comments (ask COSDA for help). Consider contracting social media management firm.		<b>August 2019</b> <b>Update:</b> <b>New CIOC Co-Chairs identified and developing work plan.</b>	CIOC New Technology Committee? Issue specific Committee (technical input)
10.2 Newsletters 10.3 Website kept updated 10.4 Feed BIN	Shorter more frequent issuance (monthly), (?)			CIOC Board New Tech Committee?

<b>Outcome</b>	<b>Activity</b>	<b>Resources Needed</b>	<b>Timeline</b>	<b>Responsibility</b>
10.2 Communicate individuals accomplishments (awards, recognition) directly to their supervisors/commissioners via recognition letter	Each individual supplies names and contact information for supervisor, commissioner and other important senior managers to copy. Create a capture form that aligns with recognition /award. Capture contact information from all program employees (title, role, etc.), way for person to update and verify as well as sign up for AAFCO notices by preference. Automate process to generate thank you letter to identified key member directors/commissioners after each meeting (Annual/Midyear) that promotes key successes at meeting and thanking them for supporting program employee attendance and participation.		George Ferguson offered to provide support <b>August 2019</b> <b>Update: New CIOC Co-Chairs identified and developing work plan.</b>	CIOC
10.3 Promote ODI to feed label reviewers/generators	Encourage states to use to help industry buy in (e.g. require ODI report with label; promote industry use to generate labels pre-market (benefit is increased OP sales and revenue to improve AAFCO)		<b>August 2019</b> <b>Update: New CIOC Co-Chairs identified and developing work plan.</b>	CIOC Feed Labeling Committee New Technology Committee ongoing support
10.4 How to distribute Spotlight On (Internal)	Utilize press releases/surveys Draft language for mini ListServ (Board/Kristen start) and see if picked up; if not outreach is next step).		<b>August 2019</b> <b>Update: New CIOC Co-Chairs identified and developing work plan.</b>	CIOC Pet Food Committee New Technology Committee

#### Participants:

<b>Name</b>	<b>Priority voting pre-meeting</b>	<b>Attended May 2, 2016</b>	<b>AAFCO role</b>
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
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 Thieux	✓	✓	Co-Chair

<b>Name</b>	<b>Priority voting pre-meeting</b>	<b>Attended May 2, 2016</b>	<b>AAFCO role</b>
Aaron Price	✓		Co-Chair
Doug Lueders	✓	✓	Chair
Linda Morrison	✓	✓	Chair
Bob Waltz	✓		Feed Safety Coord.
Kelsey Luebbe		✓	Co-Chair