



Association of American Feed Control Officials

**2021 AAFCO Midyear Meeting
Agenda Book**

Virtual

January 19–21, 2021

AAFCO 2021 Midyear Meeting - Virtual

Schedule of Meetings and Speakers

All times are in Eastern Standard Time. Please adjust for your time zone.

Meeting Access

- The [Full Access Registration](#) includes the live webcast of all committee meetings and speakers. Registrants will receive the webcast link with a unique password to use to access all AAFCO committee meetings and speakers.
- Complimentary live [Audio Listen-Only Access](#) (no webcast access) will be available. Instructions to access this complimentary listen-only option will be available on the AAFCO website.

Tuesday, January 19

11:00 am–12:15 pm
AAFCO Business Meeting

12:15 pm–12:30 pm
Break

12:30 pm–1:15 pm
Current Issues and Outreach Committee

1:15 pm–1:30 pm
Break

1:30 pm–2:15 pm
Inspection and Sampling Committee

2:15 pm–2:30 pm
Break

2:30 pm–4:00 pm
Pet Food Committee

4:00 pm–4:15 pm
Break

4:15 pm–5:00pm
Education and Training Committee

5:00 pm–5:15pm
PFI-ALSTAR Update

Wednesday, January 20

10:30 am–12:00 pm
Proficiency Testing Program

12:00 pm–1:30 pm
Break

1:30pm–2:30 pm
**Inspections During a Pandemic:
Perspectives from CVM, State and Industry**

2:30 pm–2:45pm
Break

2:45 pm–5:00pm
Ingredient Definitions Committee

Thursday, January 21

10:30 am–11:00 am
USAPlants SAFHER

11:00 am–12:30 pm
**Laboratory Methods and Services
Committee**

12:30 pm–12:45 pm
Break

12:45 pm–1:30 pm
Model Bills and Regulations Committee

1:30 pm–1:45 pm
Break

1:45 pm–2:30 pm
A Look Towards a New Administration

2:30 pm–2:45 pm
Break

2:45 pm–3:45 pm
**Feed and Feed Ingredient Manufacturing
Committee**

3:45 pm–4:00 pm
Break

4:00 pm–5:00pm
Strategic Affairs Committee

Committees Not Meeting: Enforcement
Issues Committee
Feed Labeling Committee
Technology Committee

Do you have your 2021 Official Publication subscription?

- Use it to follow along during Committee discussions.
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- 2021 Official Publication books will be shipped in the middle of December.
- Online Official Publication access begins as soon as your payment is processed and lasts for 365 days from date of purchase.

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Committee members—please log on 30 minutes prior to each session so the vice chair can determine quorum and we can do audio checks.



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Please note AAFCO does not generally record discussions during meetings unless formally announced at the start of the meeting. Having said that, there may be individuals recording presentations/discussions taking place. AAFCO does not have control over individuals who choose to do so. Furthermore, it may be a violation of state and/or other jurisdictions to make these types of recordings without knowledge of participating individuals who are being recorded.

Meet the 2021 AAFCO Board of Directors



Erin Bubba, President

Erin Bubba currently serves AAFCO as President Elect. She received a B.S. in Agricultural Science from the Pennsylvania State University. She started her career with the Pennsylvania Department of Agriculture in 2000 as an Inspector of feed, fertilizer, seed, and pesticide products. Currently, Erin is the Chief of Agronomic Products and Regional Inspection Services. She volunteers as the AAFCO Miscellaneous Products Investigator and the Alfalfa Products Investigator. Her favorite hobbies include gardening, and spending time outdoors with her two dogs. Erin lives with her husband and daughter in South Central Pennsylvania.



George Ferguson, President-Elect

George currently works as the Feed Administrator for the North Carolina Department of Agriculture & Consumer Services, where he is responsible for the management of the NC Food and Drug Protection Division's Regulatory Feed Program. While growing up on a small dairy farm in western NC George developed a passion for agriculture that would eventually bring him to NC State, from where he graduated in 1994 with a BS Degree in Poultry Science. While a student at NC State he had the good fortune to have an advisor who had purchased a small feed mill in Fuquay-Varina, where he would get his start in the feed manufacturing business. After graduation he worked briefly for Perdue Poultry in Ahoskie NC, but found himself drawn back into the world of feed where he would spend the next 15 years. From farm store management to dealer development and sales, George worked with independent dealers of numerous feed manufacturing firms to include Southern States, Purina Mills and Blue Seal Feeds. In 2012 George transitioned from industry to regulatory, as he accepted the position of Feed Safety Officer within the NC Food and Drug Protection Division, Animal Feed Program. He has since served as the Divisions Compliance Officer and now serves as the programs Administrator.



Kristen Green, Immediate Past President

Kristen Green has worked with the University of Kentucky as a Registration Specialist for the Division of Regulatory Services since 2012. In her role as a regulator, she is primarily responsible for reviewing and registering all livestock and pet foods sold in Kentucky. She has been attending AAFCO meetings for eight years. During that time, she has served on several different committees and workgroups and served as chair of the Pet Food Committee for several years. Kristen lives with her husband and two children in Lexington, Kentucky. She received her B.A. and M.A. from the University of Kentucky.



Ashlee-Rose Ferguson, Secretary-Treasurer

Originally hailing from outside of Philadelphia, Ashlee-Rose Ferguson obtained her Bachelor of Science in Wildlife Science from State University of New York: College of Environmental Science & Forestry/Syracuse University. Then going on to gain valuable public and environmental health experience with: Washington State Department of Health in the Zoonotic Disease section; Clemson University in the Department of Entomology, Soils, and Plant Sciences; South Carolina Department of Health & Environmental Control in Retail Food Protection and Vector Surveillance Programs. She moved back to Washington State in late 2017 to work with Washington State Department of Agriculture's Animal Feed Program as their Animal Feed Regulatory Program Standards (AFRPS) Coordinator, now Assistant Program Manager. Prior to her third cross-country move, Ashlee-Rose served as the Vice President for South Carolina Environmental Health Association. She is currently serving as the International Health Committee Vice Chair with Washington State Environmental Health Association, is a Registered Sanitarian/Registered Environmental Health Specialist, and a Cohort VII graduate of the International Food Protection Training Institute (IFPTI) Fellowship in Food Protection. When Ashlee-Rose is not working, she enjoys living in a lush temperate rainforest along a salmon

spawning creek, photography, traveling, and spending time with her loved ones (which includes her fiancé, Vladimir and their three cats: Koca, Luna, and Mickey, probably a dog soon too).



Austin Therrell, Director

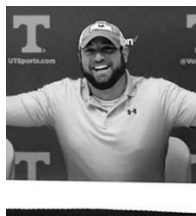
Austin currently serves as the Feed Program Coordinator for the South Carolina Department of Agriculture where he is responsible for the supervision of the animal feed regulatory program. He graduated from Clemson University with a BS in Animal and Veterinary Science in 2013. Prior to his time at SCDA Austin worked for a family owned pet food company in the sporting dog industry. During his time there he was able to learn about the manufacturing and marketing side of the pet food industry and form relationships with feed dealers and distributors across South Carolina. Austin serves on AAFCO's Pet Food Committee, as a Co-Chair of the AAFCO Feed and Feed

Ingredient Manufacturing Committee, and as a member of the AAFCO Board of Directors.



Hollis Glenn, Director

With over 10 years of state regulatory experience, Hollis Glenn became the Director of the Inspection and Consumer Services Division at the Colorado Department of Agriculture (CDA) in 2017. In this position, Hollis oversees a number of inspection programs across Colorado. Prior to coming to the CDA, Hollis worked at the Colorado Department of Regulatory Agencies-Division of Real Estate, where he worked his way up from an investigator to Deputy Director. Hollis is a proud Colorado native and earned his MBA from the University of Colorado at Denver



Eric Brady, Director

Eric Brady is the Statewide Supervisor for Ag Inputs Section for the Tennessee Department of Agriculture. Over the last four years, Eric has overseen daily field operations for the Feed, Seed, Fertilizer, and Lime programs and managed field inspectors across the state. Eric has been involved with AAFCO as the co-chair of Feed and Feed Ingredient Manufacturing and on the training cadres for BITS and AITS. Before this role, Eric was the Stormwater Coordinator for the City of Crossville. Eric holds a Master's degree in Agriculture and Natural Resource Systems Management

from the University of Tennessee. In his spare time he enjoys cattle farming and hunting.



Josh Arbaugh, Director

Josh Arbaugh is a Chemist and Seed Analyst with the West Virginia Department of Agriculture. He graduated from West Virginia University with a B.S. in Biology before joining the department in 2011. His work in the laboratory includes the analysis of animal feed, pet food, forage, seed, fertilizer, liming material, and food products. He began attending AAFCO meetings in 2013 and has been an active member of the Laboratory Methods and Services and Proficiency Testing Program Committees. Josh lives with his wife, two daughters, and three dogs in Charleston, WV.



Laura Scott, Director

Laura is a National Manager in the Animal Feed Division of the Canadian Food Inspection Agency where she is responsible for leading the feed regulatory modernization project and outreach and communications for the feed program. She graduated from the University of Guelph with a BSc in Animal Biology and an MSc in Animal Nutrition. Her experience with the CFIA includes product registration, policy development and regulatory development. Laura serves on AAFCO's Feed and Feed Ingredient Manufacturing, Ingredient Definition, and Inspection and Sampling

Committees, and as a member of the AAFCO Board of Directors.



Susan Hays, Executive Director

Susan Hays is an accomplished Executive Director with a sound association management background. She's worked with agricultural and trade associations as well as foundations as an Executive Director since 1987. Her success supporting senior leaders, board executives and members while expanding the mission and program offerings of the non-profit associations she manages is documented. She brings strong management and leadership experience to AAFCO to improve the value to AAFCO members and industry. She has a BA from the University of Wyoming where

she majored in secondary education and French.

Association Business Meeting Agenda

2021 AAFCO Midyear Virtual Meeting

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Agenda

1) Convene Business Session of the Association—Erin Bubb, President

- 1) Welcome and opening remarks
- 2) Announcement of new life members
- 3) Presentation of awards
- 4) Memorials – Kristen Green, Immediate Past President

2) **Acceptance of committee reports from:** Current Issues and Outreach, Education and Training, Feed and Feed Ingredient Manufacturing, Ingredient Definitions Committee, Ingredient Definitions eMeeting, Inspection and Sampling, Laboratory Methods & Services, Model Bills and Regulations, Pet Food, Proficiency Testing, Strategic Affairs—George Ferguson, President-Elect. This should be removed.

(Reports are published on the AAFCO website on the Midyear Meeting 2021 page, right side, under the heading “Committee Reports.”)

3) Acceptance of Committee Recommendations—George Ferguson, President-Elect

Ingredient Definitions Committee Recommendations:

1) **Publish as official T3.1 Suncured Alfalfa Meal.**

3.1 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.”

- 2) **Publish a new official definition: 57.169 Iron-choline citrate complex**
57.169 Iron-choline citrate complex made by reacting approximately equimolecular quantities of ferric hydroxide, choline, and citric acid may be safely used as a source of iron in animal feed. Minimum iron (Fe) must be specified.
- 3) **Publish as official T60.118 Ground Juniper**
60.118 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.
- 4) **Publish a replacement of 73.046 Silicon Dioxide as official (CFR)**
73.046 Silicon dioxide The food additive silicon dioxide may be safely used in animal feed in accordance with the following conditions:
- 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.
 - It is used or intended for use as an anticaking agent, antifoaming agent, carrier, and/or grinding aid in animal feed, including ingredients, intermediate premixes, premixes, supplements, concentrates, and complete feed.
 - To ensure 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.
 - To ensure safe use of the additive, the label and labeling of the additive and ingredients, intermediate premixes, premixes, supplements, concentrates, and complete feed containing the additive shall meet the requirements of the Federal Food, Drug, and Cosmetic Act, including 21 CFR 501.
 - 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 the additive and ingredients, intermediate premixes, premixes, supplements, and concentrates containing the additive shall have:
 - A statement of the concentration of the additive.
 - A statement that silicon dioxide from all sources cannot exceed 2 percent by weight of the complete feed.
- 5) **Publish as official 73.052 Sodium Aluminosilicate as an anticaking agent.**
73.052 Sodium aluminosilicate is hydrated sodium aluminum silicate having $\text{Na}_2\text{O}:\text{Al}_2\text{O}_3:\text{SiO}_2$ in molar ratios of approximately 1:1:13, respectively. It can be naturally occurring or synthetic. It consists of 66.0 to 76.0% silicon dioxide; 9.0 to 13.0% aluminum oxide; and 4.0 to 7.0% sodium oxide, on a dry basis. It is used as an anticaking agent not to exceed 2% in finished feed.
- 6) **Publish a note in Table 73.001 (page 432 2019 rev 1 OP) in section 73, Technical Additives, for sodium silicoaluminate** Add a note in the limitations section "remove this item in the 2023 OP, replaced with 73.052 Sodium aluminosilicate."

Name	FDA Regulation	Classification	Limitations
Sodium silicoaluminate IFN 8-08-101	21 CFR 582.2727	Anti-caking agent	Not to exceed 2% in finished feed. Remove this item in the 2023 OP, replaced with 73.052 Sodium aluminosilicate.

- 7) **Publish a replacement of T73.430 L-Lactic acid. (page 453 of the 2020 rev 1 online OP)**
T73.430 (A) L-Lactic acid is a sequestrant with a minimum content of 97% L-lactic acid on a dry matter basis 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.

8) **GRS Notice 31 Beta Gluconase – Motion to publish in table 101.1**

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
31 (PDF - 208 pages)	Agrivida Inc.	Ground grain obtained from a corn (Zea mays) variety that expresses an altered AC1 beta-gluconase gene obtained from an environmental DNA library (transformation event FG259)	Beta-gluconase	To decrease the viscosity of digesta in poultry consuming feeds containing high amounts of soluble non-starch polysaccharides when used to provide 200 – 500 beta-gluconase activity units per Kg of complete feed.	Poultry	7/15/19	FDA has no questions. (PDF- 4 pages)

9) **GRS Notice 32 Phytase – Motion to publish in table 101.1**

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
32 (PDF - 105 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 PY1203)	Phytase	To increase the digestibility of phytin-bound phosphorus or to increase phosphorous availability from phytate in swine feeds when used to provide 500-4500 phytase activity units (FTY)/Kg complete feed, or poultry feeds when used to provide 250-6000 FTU/Kg complete feed.	Swine & poultry	7/24/19	FDA has no questions. (PDF - 4 pages)

Model Bills and Regulations Recommendations:

- 1) Insert into Regulation 3(a)(4) of the AAFCO Model Regulations the following language to establish required guarantees for treats:** XI. Required guarantees for treats (all animal classes and species, exclusive of pets and specialty pets) 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 Section 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.
If the new guarantees for treats as stated above are approved by the AAFCO membership, current AAFCO Model Regulation 3(a)(4)(XI) would become 3(a)(4)(XII) and current AAFCO Model Regulation 3(a)(4)(XII) would become 3(a)(4)(XIII).
- 2) Add to Regulation 3(a)(3) of the AAFCO Model Regulations the following language to establish a purpose statement requirement for treats:** VIII. The purpose statement of a feed intended as a treat for a designated species (exclusive of pets and specialty pets) shall

Strategic Affairs Committee Recommendations:

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

Number of Voting Members Represented:

Number of Countries:

Number of Life Members:

Notes

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Current Issues and Outreach Committee

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Jennifer Combs, Chair

Jennifer Combs is the Animal Food Regulatory Program Standards (AFRPS) Coordinator at the University of Kentucky, Division of Regulatory Services (UKDRS). Upon receiving her Bachelor of Science in Agriculture and minor in chemistry she began working with the University of Kentucky Animal Sciences Department in ruminant nutrition research. She joined UKDRS in 2014 working in the Feed and Fertilizer lab and moved into the AFRPS position in late 2016. She, her husband Jarrod Combs, and their two girls raise: cattle, chickens, working bird dogs, and horses on their farm.

Agenda

- 12:30 Welcome & Opening Remarks
Ali Kashani, Committee Member, Washington State Department of Agriculture
- 12:40 Committee Updates:
Jennifer Combs, Chair, University of Kentucky
Jo Lynn Otero, Vice-Chair, New Mexico Department of Agriculture
- 12:45 Strategic Communication Firm Selection Process
Hollis Glenn, Committee Member, CO Department of Agriculture
- 1:00 AAFCO Engagement Survey, Future Plans with AAFCO 101, & Awards Workgroup
Jennifer Combs
- 1:10 Comments/Suggestions for Future Meetings & Closing Remarks
Jolynn Otero
- 1:15 Adjourn

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Inspection and Sampling Committee

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Miriam W. Johnson, Chair

Miriam W. Johnson is the Compliance and Inspection Programs Lead Compliance Officer for the North Carolina Department of Agriculture and Consumer Services. She Graduated from North Carolina State University with a BS in Animal Science and minors in Nutrition and Agricultural Business Management. She started her career working for Murphy-Brown, LLC, a Division of Smithfield Foods, in the commercial swine production division for 4 years before coming to the North Carolina Department of Agriculture & Consumer Services as the Feed Compliance Officer. She held this position for 7 years before accepting a position as a Feed Field Inspector for Southeastern North Carolina. She worked as a field inspector for 3 years and then returned to Raleigh after accepting her current position as the lead compliance officer for the Animal Feed Program and supervisor for field inspection and compliance staff. She has worked for NCDA & CS for 13 years. Miriam has been involved with AAFCO as the Feed Labeling Committee Co-Chair from 2011-2013, the Inspection and Sampling Committee Chair from 2017 to present, and as a member of the training cadres for AITS and BITS. Miriam and her husband, Benton, also operate a small family century farm in eastern North Carolina where they raise swine, cattle and muscadine grapes.

Agenda

2:00 Welcome & Opening Remarks

Miriam Johnson: North Carolina Department of Agriculture & Consumer Services

2:05 AAFCO Sampling Study

Single Tube Trier Method Sampling Study: Progress and Update from the University of KY
Al Harrison: University of Kentucky Division of Regulatory Services

2:25	AITS & BITS 2021 AITS & BITS: Schedule and Recruiting; Planning virtual options for the future Miriam Johnson: North Carolina Department of Agriculture & Consumer Services Jessica Gore: North Carolina Department of Agriculture & Consumer Services Brett Groves: Office of the Indiana State Chemist
2:30	AITS/BITS Curriculum Workgroup: Progress and Updates Development and update of materials for AITS Inspector Guidance Tool for PC and cGMP inspections Miriam Johnson: North Carolina Department of Agriculture & Consumer Services Jessica Gore: North Carolina Department of Agriculture & Consumer Services
2:40	Other Topics for Discussion/New Business Update/Discussion: Request for addition of bulk tote sampling method Miriam Johnson: North Carolina Department of Agriculture & Consumer Services
2:45	Adjourn Additional New Business Adjourn

Notes

[illegible]

Pet Food Committee

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Committee members—please log on 30 minutes prior to each session to allow the vice chair to determine quorum and to do audio checks.



Liz Beckman, Chair

Liz Beckman is a Feed Advisor with the Washington State Department of Agriculture, Animal Feed Program. Liz's duties currently include Country of Origin reviews, Animal feed standards and Commercial feed Licensing. Liz is also responsible for collection and auditing of inspection fees. Liz has served on various AAFCO committees. Liz is a cat and dog lover, she has two cats and one dog. In her free time Liz enjoys gardening, hunting and fishing and spending time with her niece.

Agenda

This is a reminder that this meeting is being recorded.

1. Human Grade Guidelines Update
2. PFLM – Update
3. Fatty Acids and Arachidonic acid (ARA) – Are they essential or not essential per AAFCO Dog Food Nutrient Profiles? Panel Discussion, no action from PFC.

Attachment A: Draft Model Regulations for Pet Food and Specialty Pet Food Under the Model Bill

These Model Regulations are approved by the Association of American Feed Control Officials (AAFCO) under the Model Bill and in conjunction with the Model Regulations. States proposing to adopt these Model Regulations for Pet Food and Specialty Pet Food under their own state feed law are encouraged to adopt AAFCO's Model Regulations for feed, which also apply to pet food and specialty pet food, unless otherwise noted within these regulations.

Pursuant to due publication and public hearing required by the provisions of Chapter ____ of the Laws of this State, the ____ has adopted the following Rules and Regulations.

Regulation PF1. Definitions and Terms

The definitions in the Model Bill and Model Regulations shall apply in addition to the following:

- (a) "All Life Stages" means gestation/lactation, growth, and adult maintenance life stages.
- (b) "Family" means a group of products, which are nutritionally adequate for any or all life stages based on their nutritional similarity to a lead product, which has been successfully test-fed according to an AAFCO feeding protocol(s).
- (c) "Immediate Container" means the unit, can, box, tin, bag, or other receptacle or covering in which a pet food or specialty pet food is displayed for sale to retail purchasers, but does not include containers used as shipping containers.
- (d) "Ingredient Statement" means a collective and contiguous listing on the label of the ingredients of which the pet food or specialty pet food is composed.
- (e) "Principal Display Panel" means the part of a label that is most likely to be displayed, presented, shown or examined under normal and customary conditions of display for retail sale.
- (f) "Pet Nutrition Facts" is a graphic box located on the label containing nutritional information for a pet food product.
- (g) "Specialty Pet Nutrition Facts" is a graphic box located on the label containing nutritional information for a specialty pet food product.

...

Regulation PF2. Label Format and Labeling

- (a) Pet food and specialty pet food shall be labeled with the following information prescribed in this Regulation:
 - (1) Product name and brand name, if any, on the principal display panel as stipulated in Regulation PF3;
 - (2) A Statement specifying the species name of pet or specialty pet for which the food is intended, conspicuously designated on the principal display panel;
 - (3) Quantity statement, as defined in Section 3(s) of this Act and Regulation 3(a)(8) of the Model Regulations, by weight (pounds and ounces, and metric), liquid measure (quarts, pints and fluid ounces, and metric) or by count, on the principal display panel;
 - (4) Pet Nutrition Facts or Specialty Pet Nutrition Facts as stipulated in Regulation PF4;

...

Regulation PF4. Pet and Specialty Pet Nutrition Facts

- (a) A Pet Nutrition Facts box shall be displayed in a prominent place on the label of all pet foods (including snacks, treats, and food supplements), but not necessarily on the PDP, utilizing the format displayed in PF4(j) in black type with white background under the heading "Pet Nutrition Facts." The box contains the following required elements:
 - (1) The unit of common measure and its weight in grams.
 - (2) A statement of calorie content and meet all of the following:
 - A. The statement shall indicate Calories per the familiar household unit (i.e. can, cup, treat or piece) as shown in the upper left corner of the Pet Nutrition Facts box.
 - B. The statement shall be measured in terms of metabolizable energy (ME) on an "as fed" basis; and
 - C. The calorie content is determined by one of the following methods:
 - i By calculation using the following "Modified Atwater" formula: $ME (kcal/kg) = 10[(3.5 \times CP) + (8.5 \times CF) + (3.5 \times NFE)]$, where ME = metabolizable energy, CP = % crude protein "as fed," CF = % crude fat "as fed," NFE = % nitrogen-free extract (carbohydrate) "as fed," and the percentages of CP and CF are the average values of these components in the product as determined by sound scientific methods, such as, but not limited to scientifically accurate calculations made from the formula of the product or upon chemical analysis of the product. The NFE is calculated as the difference between 100 and the sum of CP, CF, and the percentages of crude fiber, moisture and ash (determined in the same manner as CP and CF); or
 - ii In accordance with a testing procedure established by AAFCO.
 - D. An affidavit shall be provided upon the request of, substantiating that the calorie content was determined by:

- i Regulation PF4(a)(1)(C)(i) in which case the summary data used in the calculation shall be included in the affidavit; or
 - ii Regulation PF4(a)(1)(C)(ii) in which case the summary data used in the determination of calorie content shall accompany the affidavit.
 - E. The calorie content statement shall appear as one of the following:
 - i The heading "Calories per (familiar household unit)" on the label or other labeling shall be followed parenthetically by the word "calculated" when the calorie content is determined in accordance with Regulation PF4(a)(1)(C)(i); or
 - ii The heading "Calories per (familiar household unit)" on the label or other labeling shall be followed parenthetically by the word "fed" when the calorie content is determined in accordance with Regulation PF4(a)(1)(C)(ii).
 - F. Below the calorie content statement, the number of calories contributed by Protein, Fat and Carbohydrate shall be declared after the heading "From:" in kcal.
- (3) The "Guaranteed Amount" values shall be listed in the following order and the format shown in PF4(j) unless otherwise specified in these Regulations:
 - A. A pet food label shall list the following required guaranteed amounts based upon the following tests;
 - i Protein is minimum percentage of crude protein
 - ii Fat is minimum percentage of crude fat;
 - iii Non Fiber Carbohydrate is maximum percentage equal to $[100 - (\text{Crude Protein} + \text{Dietary Fiber} + \text{Moisture} + \text{Ash})]$ (designated on small packages as Carb);
 - iv Dietary Fiber is maximum percentage of total dietary fiber (designated on small packages as Fiber);
 - v Moisture is maximum percentage of moisture; and
 - vi Maximum percentage of crude fat shall be listed as Fat Max between Fat Min and Non Fiber Carbohydrate if required by Regulation PF 9;
 - vii Additional guarantees shall follow moisture below a bold line.
 - B. When ash is listed in the guaranteed amount on a pet food label, it shall be guaranteed as a maximum percentage and shall immediately follow moisture above the bold line.
 - C. When listed on the label of a dog or cat food product, guarantees for dietary starch and sugars shall be stated as maximum guaranteed amounts. Neither guaranteed amount shall be listed without the other. The guaranteed amount for dietary starch shall follow ash, if also listed, or moisture if ash is not listed. The guaranteed amount for sugars shall follow dietary starch.
 - D. A dog or cat food label shall list other required or voluntary guaranteed amounts in the same order and units of the nutrients in the AAFCO Dog (or Cat) Food Nutrient Profiles below a double bolded line. Guaranteed amounts for substances not listed in the AAFCO Dog (or Cat) Food Nutrient Profiles, or not otherwise provided for in these Regulations, shall immediately follow the listing of the recognized nutrients and shall be accompanied by an asterisk referring to the disclaimer "not recognized as an essential nutrient by the AAFCO Dog (or Cat) Food Nutrient Profiles." The disclaimer shall appear immediately after the last such guaranteed amount in the same size type as the guarantees.
- (4) The "Amount of Nutrient per Familiar Household Measure" for each "Guaranteed Amount" is determined by multiplying the Guaranteed Amount percentage by the number of grams in the familiar household unit. On large packages, this can be found in the upper right (C). On small packages, this is the weight in grams of the container.
- (b) A Specialty Pet Nutrition Facts box shall be displayed in a prominent place on the label of all specialty pet foods, but not necessarily on the PDP, utilizing the format displayed in PF4(k) in black type with white background under the heading "Specialty Pet Nutrition Facts." The box contains the following required elements:
 - (1) The unit of common measure and its weight in grams
 - (2) The "Guaranteed Amount" values shall be listed in the following order and format shown in in PF4(k) unless otherwise specified in these Regulations:
 - A. A specialty pet food label shall list the following required guaranteed amounts based upon the following tests;

- i Protein is minimum percentage of crude protein
 - ii Fat is minimum percentage of crude fat;
 - iii Non Fiber Carbohydrate is maximum percentage equal to $[100 - (\text{Crude Protein} + \text{Dietary Fiber} + \text{Moisture} + \text{Ash})]$ (designated on small packages as Carb);
 - iv Dietary Fiber is maximum percentage of total dietary fiber (designated on small packages as Fiber); and
 - v Moisture is maximum percentage of moisture;
 - vi Additional guarantees shall follow moisture below a bold line.
- B. When ash is listed in the guaranteed amount on a specialty pet food label, it shall be guaranteed as a maximum percentage and shall immediately follow moisture above the bold line.
- C. A specialty pet food label shall list other required or voluntary guaranteed amounts in the same order and units of the nutrients in an AAFCO-recognized nutrient profile for the specific species; however, if no species-specific AAFCO- recognized nutrient profile is available, the order and units shall follow the same order and units of nutrients in the AAFCO Cat Food Nutrient Profile. Guaranteed amounts for substances not listed in an AAFCO recognized nutrient profile for the specific species of animal shall immediately follow the listing of recognized nutrients and shall be accompanied by an asterisk referring to the disclaimer “not recognized as an essential nutrient by the_____.” (Blank is to be completed by listing the specific AAFCO recognized nutrient profile.) This disclaimer shall appear immediately after the last such guaranteed amount in the same size type as the guarantees. No such disclaimer shall be required unless an AAFCO-recognized nutrient profile is available for the specific species of specialty pet.
- (3) The “Amount of Nutrient per Familiar Household Measure” for each “Guaranteed Amount” is determined by multiplying the Guaranteed Amount percentage by the number of grams in the familiar household unit. On large packages, this can be found in the upper right (C). On small packages, this is the weight in grams of the container.
- (c) The sliding scale method of expressing a guaranteed amount on a pet food or specialty pet food label (for example, “Protein 15–18% Min”) is prohibited.
- (d) The Pet Nutrition Facts or Specialty Pet Nutrition Facts box of a pet food or a specialty pet food which is formulated as and represented to be a mineral supplement shall include:
 - (1) Minimum guaranteed amounts for all minerals from sources declared in the ingredient statement and established by an AAFCO-recognized nutrient profile, expressed as the element in units specified in the nutrient profile; or
 - (2) Minimum guaranteed amounts for all minerals from sources declared in the ingredient statement expressed as the element in units specified in the AAFCO Cat Food Nutrient Profiles when no species-specific nutrient profile has been recognized by AAFCO; and provided that
 - (3) Mineral guaranteed amounts required by Regulation PF4 (d)(1) and (2) shall be expressed in units consistent with the AAFCO nutrient profiles and in milligrams (mg) per unit (e.g., tablets, capsules, granules, or liquids) consistent with those employed in the quantity statement and directions for use; and
- (e) The Pet Nutrition Facts or Specialty Pet Nutrition Facts box of a pet food or a specialty pet food which is formulated as and represented to be a vitamin supplement shall include:
 - (1) Minimum guaranteed amounts for all vitamins from sources declared in the ingredient statement and established by an AAFCO-recognized nutrient profile, expressed in units specified in the nutrient profile; or
 - (2) Minimum guaranteed amounts for all vitamins from sources declared in the ingredient statement expressed in units specified in the AAFCO Cat Food Nutrient Profiles when no species-specific nutrient profile has been recognized by AAFCO; and provided that
 - (3) Vitamin guaranteed amounts required by Regulation PF4(e)(1) and (2), shall be expressed in units consistent with the AAFCO nutrient profiles and in approved units (e.g., IU, mg, g) per unit (e.g., tablets, capsules, granules, or liquids) consistent with those employed in the quantity statement and directions for use; and
- (f) When the label of a pet food or specialty pet food includes a comparison of the nutrient content of the food with levels established by an AAFCO- recognized nutrient profile such as a table of

comparison, a percentage, or any other designation referring to an individual nutrient or all of the nutrient levels, the following apply;

- (1) The product shall meet the AAFCO-recognized nutrient profile; and
 - (2) The statement of comparison shall be preceded by a statement that the product meets the AAFCO-recognized profile: however, the statement that the product meets the AAFCO-recognized nutrient profile is not required provided that the nutritional adequacy statement as per Regulation PF7(a)(1) or PF7(b)(2)(A) appears elsewhere on the product label; and
 - (3) The statement of comparison of the nutrient content shall constitute a guarantee, but need not be repeated in the guaranteed amount column; and
 - (4) The statement of comparison may appear on the label separate and apart from the guaranteed amount column.
- (g) The maximum moisture declared on a pet food or specialty pet food label shall not exceed 78.00% or the natural moisture content of the ingredients, whichever is higher. However, pet food and specialty pet food such as, but not limited to, those consisting principally of stew, gravy, sauce, broth, aspic, juice, or a milk replacer, and which are so labeled, may contain moisture in excess of 78.00%.
- (h) Guarantees for protein, fat, non-fiber carbohydrate and dietary 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.
- (i) Guaranteed amounts for microorganisms and enzymes shall be stated in the format as stipulated in Model Regulations 4(g) and (h). The "Amount of Nutrient per Familiar Household Measure" column should be left blank. For enzymes, the explanation of activity units should follow the disclaimer within the box.
- (j) Pet Nutrition Facts Formatting Guide:
Minimum requirement for packages with a total printable area greater than or equal to 12 square inches.

Specialty Pet Nutrition Facts		
(A) (B) = (C)g		
Nutrients	Guaranteed Amount	Amount of Nutrient Per (A)
Protein	(Q) % Min	(S) g
Fat	(Q) % Min	(S) g
Non Fiber Carbohydrate	(Q) % Max	(S) g
Dietary Fiber	(Q) % Max	(S) g
Moisture	(Q) % Max	(S) g

Minimum requirement for packages with a total printable area less than 12 square inches (small packages).

Pet Nutrition Facts Per (A) Calories/ (A) (B): (C) From Protein (E) Fat (G) Carbs (H) Nutrient Guarantees/Amount per									
(A): Protein	(Q) % Min/ (R) g	Fat	(Q) % Min/ (R) g	Carb	(Q) % Max/ (R) g	Fiber	(Q) % Max/ (R) g	Moisture	(Q) % Max/ (R) g

Sample format for packages with a total printable area greater than or equal to 12 square inches with voluntary guaranteed amounts per PF4 or required additional guaranteed amounts per PF9.

Pet Nutrition Facts		
(A) (B) = (C) g		
Calories Per (A) (D) From: Protein (F), Fat (G), Carbohydrate (H) (E)		
Nutrients	Guaranteed Amount	Amount of Nutrient Per (A)
Protein	(Q) % Min	(S) g
Fat	(Q) % Min	(S) g
(J) Fat	(Q) % Max	(S) g
Non Fiber Carbohydrate	(Q) % Max	(S) g
Dietary Fiber	(Q) % Max	(S) g
Moisture	(Q) % Max	(S) g
(K) Ash	(Q) % Max	(S) g
(L)	(T) (Min or Max)	(U)
(M)*	(V) (Min or Max)	(W)
(N)* Not recognized as an essential nutrient by the AAFCO		
(P) Food Nutrient Profiles.		
(X) [Explanation of enzyme units]		

Sample format for packages with a total printable area less than 12 square inches with voluntary guaranteed amounts per PF4 or required additional guaranteed amounts per PF9.

Pet Nutrition Facts Per (A) Calories/ (A) (D): (E), From Protein (F), Fat (G), Carbs (H) Nutrient Guarantees/Amount per										
(A): Protein	(Q) % Min/ (R) g,	Fat	(Q) % Min/ (R) g,	(J) Fat	(Q) % Max/ (R) g,	Carb	(Q) % Max/ (R) g,	Fiber	(Q) % Max/ (R) g,	Moisture
(Q) % Max/ (R) g,	(K) Ash	(Q) % Max/ (R) g,	(L) (Min or Max)/ (U) (Min or Max)/ (V) (Min or Max)/ (W) (Min or Max)/ (X) (Min or Max)/ (Y) (Min or Max)/ (Z) (Min or Max)	(N)* Not recognized as an essential nutrient by the AAFCO	(P) Food Nutrient Profiles.	(X) [Explanation of enzyme units]				

Key for Generic Pet Nutrition Facts Box.

Note: Letters below correspond to white letters in black circles conveniently located on the facts box examples above.

- (A) Familiar common measurement, for example 1 can, 1 tray, 1 pouch, 1 unit of product (treat, piece, etc.), 1 cup, 1 teaspoon.
- (B) If unit cited in A needs explanation, provide within the parentheses, for example: "1 cup (8 oz. Standard Measuring Cup)" or "1 fl. oz. = 28 grams". If no explanation is needed, this element is not required.
- (C) Weight in grams of familiar common measurement cited in A. In cases of non-uniform products that are reported per piece, indicate the average weight and add "(avg)" after the weight.
- (D) Insert "calculated" or "fed" within the parentheses as appropriate per PF4(a)(1)(C) i or ii.
- (E) Insert value per PF4(a)(1)(C).
- (F) Insert number of kilocalories contributed by protein as determined by PF4(a)(1)(C).
- (G) Insert number of kilocalories contributed by fat as determined by PF4(a)(1)(C).
- (H) Insert number of kilocalories contributed by carbohydrate as determined by PF4(a)(1)(C).
- (J) Insert a second row for Fat, with guaranteed maximum amount if required by Regulation PF9.
- (K) Insert a row following moisture when a guaranteed amount for ash and/or dietary starch and sugars is provided.
- (L) Insert row(s) for other required or voluntary guarantees listed as essential nutrients under a double bolded line per PF4(a)(2)(D).
- (M) Insert rows for voluntary guarantees for non-essential nutrients per PF4(a)(2)(D).
- (N) This disclaimer is only required when guaranteed amounts for non-essential nutrients are included per PF4(a)(2)(C) or (D).
- (P) Insert "Cat" or "Dog" as appropriate to intended use of product.
- (Q) Insert appropriate guaranteed amounts as specified in PF4(a)(2)(A) i-v
- (R) For small packages only, insert appropriate value determined by multiplying the decimal equivalent of guaranteed amount by the total weight contained in A (ie for a guaranteed amount of 23% and a weight in grams in A of 30, move the decimal on the percent value

two places to the left (0.23) and multiply by the weight of the familiar common measurement (30) to get a 6.9 value for R).

- (S) Insert appropriate value determined by multiplying the decimal equivalent of guaranteed amount by the value cited in C. (ie for a guaranteed amount of 23% and a weight in grams in C of 90, move the decimal on the percent value two places to the left (0.23) and multiply by the weight of the familiar common measurement (90) to get 20.7 value for S).
 - (T) The guaranteed amount shall be listed according to the same units of the nutrients in the AAFCO Dog (or Cat) Food Nutrient Profiles.
 - (U) Calculate value per T. Report in grams for guaranteed amounts that are percentages. When other units are used, report as appropriate (e.g. for a guaranteed amount in IU/kg report in IU, for a guaranteed amount in mg/kg report in mg, etc).
 - (V) The guaranteed amount shall be reported in units consistent with intended use (e.g. percentage, mg/kg, etc.). Guarantees for microorganisms and enzymes shall be stated in the format as stipulated in model reg. 4(g) and 4(h).
 - (W) Calculate value per V. Report in grams for guaranteed amounts that are percentages. When other units are used, report as appropriate (e.g. for a guaranteed amount in IU/kg report in IU, for a guaranteed amount in mg/kg report in mg, etc.).
 - (X) Provide an explanation of enzyme units, if necessary.
- (k) Specialty Pet Nutrition Facts Formatting Guide:
Minimum requirement for packages with a total printable area greater than or equal to 12 square inches.

Specialty Pet Nutrition Facts		
(A) (B) = (C)g		
Nutrients	Guaranteed Amount	Amount of Nutrient Per (A)
Protein	(Q) % Min	(S) g
Fat	(Q) % Min	(S) g
Non Fiber Carbohydrate	(Q) % Max	(S) g
Dietary Fiber	(Q) % Max	(S) g
Moisture	(Q) % Max	(S) g

Minimum requirement for packages with a total printable area less than 12 square inches (small packages).

Specialty Pet Nutrition Facts Per (A) Nutrient Guarantees/Amount per (A): Protein (Q) % Min/ (R) g, Fat (Q) % Min/ (R) g, Carb (Q) % Max/ (R) g, Fiber (Q) % Max/ (R) g, Moisture (Q) % Max/ (R) g		
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Sample format for packages with a total printable area greater than or equal to 12 square inches with voluntary guaranteed amounts per PF4.

Specialty Pet Nutrition Facts		
(A) (B) = (C)g		
Nutrients	Guaranteed Amount	Amount of Nutrient Per (A)
Protein	(Q) % Min	(S) g
Fat	(Q) % Min	(S) g
(J) Fat	(Q) % Max	(S) g
Non Fiber Carbohydrate	(Q) % Max	(S) g
Dietary Fiber	(Q) % Max	(S) g
Moisture	(Q) % Max	(S) g
(K) Ash	(Q) % Max	(S) g
(L)	(T) (Min or Max)	(U)
(M)*	(V) (Min or Max)	(W)
(N)* Not recognized as an essential nutrient by the AAFCO		
(P) Food Nutrient Profiles.		
(X) [Explanation of enzyme units]		

Sample format for packages with a total printable area less than 12 square inches with voluntary guaranteed amounts per PF4.

Specialty Pet Nutrition Facts		Per		(A) Nutrient Guarantees/Amount per		(A) : Protein		(B) % Min/ (R) g, Fat		(B) % Min/ (R) g,	
Fat		(B) % Max/ (R) g, Carb		(B) % Max/ (R) g, Fiber		(B) % Max/ (R) g, Moisture		(B) % Max/ (R) g, K, Ash		(B) % Max/ (R) g,	
(L) (Min or Max)/ (U, M) (Min or Max)/ (W, N) *Not recognized as an essential nutrient by the AAFCO		(P) Food Nutrient		Profiles (X) (Explanation of enzyme units)							

Key for Generic Specialty Pet Nutrition Facts Box.

Note: Letters below correspond to white letters in black circles conveniently located on the facts box examples above.

- (A) Familiar common measurement, for example 1 can, 1 tray, 1 pouch, 1 unit of product (treat, piece, etc.), 1 cup, 1 teaspoon.
- (B) If unit cited in A needs explanation, provide within the parentheses, for example: “1 cup (8 oz. Standard Measuring Cup)” or “1 fl. oz. = 28 grams”. If no explanation is needed, this element is not required.
- (C) Weight in grams of familiar common measurement cited in A. In cases of non-uniform products that are reported per piece, indicate the average weight and add “(avg)” after the weight.
- (K) Insert a row following moisture when a guaranteed amount for ash is provided.
- (L) Insert row(s) for other required or voluntary guarantees listed as essential nutrients under a double bolded line per PF4(b)(1)(C)
- (Q) Insert appropriate guaranteed amounts as specified in PF4(b)(1)(A) i–v.
- (R) For small packages only, insert appropriate value determined by multiplying the decimal equivalent of guaranteed amount by the total weight contained in A (ie for a guaranteed amount of 23% and a weight in grams in A of 30, move the decimal on the percent value two places to the left (0.23) and multiply by the weight of the familiar common measurement (30) to get a 6.9 value for R).
- (S) Insert appropriate value determined by multiplying the decimal equivalent of guaranteed amount by the value cited in C. (ie for a guaranteed amount of 23% and a weight in grams in C of 90, move the decimal on the percent value two places to the left (0.23) and multiply by the weight of the familiar common measurement (90) to get 20.7 value for S).
- (T) The guaranteed amount shall be listed according to the same units of the nutrients required in PF(b)(1)(C).
- (U) Calculate value per T. Report in grams for guaranteed amounts that are percentages. When other units are used, report as appropriate (e.g. for a guaranteed amount in IU/kg report in IU, for a guaranteed amount in mg/kg report in mg, etc.
- (V) The guaranteed amount shall be reported in units consistent with intended use (e.g. percentage, mg/kg, etc.). Guarantees for microorganisms and enzymes shall be stated in the format as stipulated in model reg. 4(g) and 4(h).
- (W) Calculate value per V. Report in grams for guaranteed amounts that are percentages. When other units are used, report as appropriate (e.g. for a guaranteed amount in IU/kg report in IU, for a guaranteed amount in mg/kg report in mg, etc.).
- (X) Provide an explanation of enzyme units, if necessary.

Attachment B: Pet Food Labeling Modernization Workgroup—Nutritional Adequacy and Feeding Directions—Draft Revisions to PF7

NUTRITIONAL ADEQUACY GRAPHIC – PF7

PF7 (a) through (d) – No change

- (e) Dog and cat foods, including treats, snacks and supplements, shall include a graphic representation of nutritional adequacy or purpose of the product. The graphic representation shall meet the following:
 - (1) It shall be displayed in an unobstructed, conspicuous manner on lower right quadrant of the principal display panel with text oriented parallel to the base and on the alternate principal display panel with text oriented parallel to the base, should one exist; and, it shall be consistent with the intended use of the product indicated in the nutritional adequacy statement or elsewhere on the label.

- (A) For complete & balanced products, including snacks and treats, that meet the requirements of PF7 (a) or (b) it shall consist of the circle below appropriate for the intended species, life stage, and size.
- “All Size Dogs” if product has been formulated to meet the levels of nutrients specifically referenced in the Dog Food Nutrient Profiles as being applicable to large size growing dogs.
 - “Small & Medium Size Dogs” if the product has not been formulated to meet the levels of nutrients specifically referenced in the Dog Food Nutrient Profiles as being applicable to large size growing dogs.

The minimum diameter of the entire circle shall be as follows:

Panel Size	Minimum Diameter of Circle
≤5 in. ²	½ in.
>5 in. ² to ≤25 in. ²	¾ in.
>25 in. ² to ≤100 in. ²	1 in.
>100 in. ² to ≤400 in. ²	1 ¾ in.
>400 in. ²	2 in.

The graphic shall be obtained from the AAFCO website. There are two different color schemes to choose from for the best contrast on packaging.





For products that are not complete & balanced, it shall consist of a rectangle below appropriate to the product type.

Panel Size	Minimum Height of Rectangle	Minimum Width of Rectangle
≤25 in. ²	¼ in.	½ in.
>25 in. ²	½ in.	13/16 in.

The graphic shall be obtained from the AAFCO website. There are two different color schemes to choose from for the best contrast on packaging.



- (B) For products intended for use by, or under the supervision or direction of a veterinarian it shall consist of an octagon with the words “Feed Under Veterinary Supervision Only”.

Panel Size	Minimum Height of Octagon
≤5 in. ²	½ in.
>5 in. ² to ≤25 in. ²	¾ in.
>25 in. ² to ≤100 in. ²	1 in.
>100 in. ² to ≤400 in. ²	1 ¾ in.
>400 in. ²	2 in.

The graphic shall be obtained from the AAFCO website. There are two different color schemes to choose from for the best contrast on packaging.



Current PF7 (e) through (g) – renumbered as PF7 (f) through (h)

Attachment C: Handling and Instructions Work Group Recommendations

The safe handling and instructions workgroup (now the handling and instructions) has met and agreed the attached “20200923Regulation PFXXHandlingStorageInstruc_rev2_DRAFT” is ready to be sent to the Pet Food Committee for recommendation. Additionally, the workgroup recommends the following:

- PFC consider revising or expanding the raw milk regulation (PF2(i)) to include other raw animal protein products.
- Handling and Storage Instructions be added to PF2(a).
- Proposed regulation for handling and storage instructions should be subject to consumer qualitative review and comment.
- Disband the work group.

-Handling and Instructions Work Group

Regulation PFXX Handling and Storage Instructions:

- a) Non-heat-treated (raw) pet food products shall have a section titled “Handling and Storage Instructions” (as stipulated in PFXX(d)) that contains the following statements: “To prevent illness from bacteria: Keep this product separate from human foods. Wash hands, working and feeding surfaces, utensils (including cutting boards, preparation and feeding utensils), and any other items that contact this product with hot soapy water. Keep this product out of the reach of children.” Additional handling and storage instruction text as determined by the manufacturer and graphics as stipulated in PFXX(c) may be used.
- b) Extruded, baked, retorted or cooked pet food products may have a section and, if present, shall be titled “Handling and Storage Instructions” (as stipulated in PFXX(d)) with language determined by the manufacturer.
- c) The following graphics (and only the following graphics) may be included with the handling and storage instructions section, as applicable. The graphics with accompanying text shall be obtained from the AAFCO website.



- d) The handling and storage instructions header shall be bolded with at least two points separating the handling and storage instructions and other directions for use. The statement shall be displayed in a conspicuous manner so to render it likely to be read under conditions of use, with a minimum size as shown in the following table:

Education and Training Committee

2021 AAFCO Midyear Virtual Meeting

Tuesday, January 19, 2021

4:15–5:00 pm (EST)

Meeting Access

Full access registration includes the live webcast of this committee meeting. The virtual service provider for this meeting is the same provider AAFCO worked with in August for the 2020 AAFCO Annual Meeting. January 14: Registrants receive their username and password along with a video providing instructions on how to access and use the portal.

Lost your access codes or need other technical support for the video platform? Email support@performedia.com.

Full access registrants will use these buttons during our meeting:

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Marissa Kost, Chair

Marissa was born and raised in Ohio prior to moving to North Carolina to attend college. She graduated from North Carolina State University with a B.S. in Animal Science and Poultry Science. She continued her education at NCSU to receive her M.S. in Poultry Science with a minor in statistics. She has worked with the North Carolina Department of Agriculture & Consumer Services in the Animal Feed Program for almost 2 years as an Agricultural Compliance Officer. Marissa attended her first AAFCO meeting in January 2018 in Ft. Lauderdale, FL. She has been a member of the Education and Training Committee since 2017 and has served as committee chair

since May 2019. In her spare time, she enjoys traveling, cooking, and spending time with friends and family.

Agenda

Welcome, Introductions & Opening Remarks

Marissa Kost, Committee Chair

New Members Introductions

Workgroup Updates (5-10 mins)

Training Calendar – Jacob Fleig, MO

Leadership Training – Darlene Krieger, FDA

Training Endorsement Policy & Tables – Marissa Kost, NC

Training Availability Update (15-20 mins)

FDA OTED Training Update – FDA OTED

Industry Training – Scott Ringger, AFIA

AAFCO Online Training Program – Sue Hays, Executive Director

Workshop Calendar Request Update (10 mins)

FAS 2021 (Estes Park, CO): *Tentative - Dates TBD*

Annual Meeting 2021 (Omaha, NE): GRAS Workshop (*Rescheduled from Annual 2020 & Midyear 2021*) & Ingredient Definitions Submission Preparation Workshop

Midyear Meeting 2022 (Mobile, AL): OPEN

Feed Administrator's Seminar (FAS) Sub-Committee (10 mins)

New Business

Adjourn

Notes

Pet Food Institute–ALSTAR Update

2021 AAFCO Midyear Virtual Meeting

Tuesday, January 19, 2021

5:00–5:15 pm (EST)



Jacob Fleig

In December of 2010, Jacob joined the Missouri Department of Agriculture Bureau of Feed, Seed & Treated Timber as an Inspector II, covering 20 counties in the Northwest corner of the state, inspecting and sampling feed, seed, and treated timber and performing FDA contract work. After 2 years, he took a smaller area in the central part of the state which afforded more time to focus on additional responsibilities which included reviewing FDA contract work for the program, helping to transition into a new software system, attend advanced training related to emergency response and investigation as part of the state's Rapid Response Team and becoming a HACCP trainer for the department. In 2014, Jacob assisted in the transition to a new regulatory software program during which time he assisted with the program's testing, procedure creation and implementation as well as the training of staff on its use. In June 2015, he became a Program Coordinator for the department, with the additional responsibility of coordinating the implementation of the Animal Feed Regulatory Program Standards (AFRPS). For the past 4.5 years, he has been working towards achieving full implementation of the AFRPS, currently completing implementation of Standard 2 to complete this effort. During this time, he also went through the inaugural class of the Missouri Leadership Academy and continued to volunteer as a facilitator for the State's Missouri Way seminar. Jacob currently serves on the USA Food Safety/USA Plants Governing Council, and he is the chair of the USA Plants User Group. Within the AAFCO community, Jacob serves as the Technology Committee Chair and sits on the Ingredient Definitions Committee, the Inspection & Sampling Committee, and the Education & Training Committee.



Michael Hill

Michael Hill is the Director for the Center for Environmental and Regulatory Information Systems (CERIS) at Purdue University. Michael has over 25 combined years of software development experience in the public and private sectors. He joined CERIS in 2005 as a Programmer Analyst, became Systems Analyst in 2010, the Associate Director in 2017, and the Director in 2019. He holds both an A.S and B.S. degree in Computer Information Systems along with an M.S. degree in Adult Education. Michael also is a Certified Information Systems Security Professional (CISSP), Certified Scrum Master (CSM), and Certified Scrum Product Owner (CSPO). The programs that Michael oversees at CERIS include the National Pesticide Information Retrieval System (NPIRS), Cooperative Agricultural Pest Survey Information Services (CAPSIS), National Plant Diagnostic Network (NPDN) National Repository, and BoilerApps. Additionally, the NPIRS program has managed and operated the Accepted Labels State Tracking and Repository (ALSTAR) since its inception.



Martin Deubler

Martin Deubler is currently the Assistant Director for the Center for Environmental and Regulatory Information Systems (CERIS) at Purdue University. Martin has over 15 years of regulatory and state registration experience in the agricultural crop protection sector. He joined CERIS in 2018 as the NPIRS Program Manager and has continued to grow the program. The National Pesticide Information Retrieval System (NPIRS) continues to be the largest program at CERIS. The NPIRS program has managed and operated the Accepted Labels State Tracking and Repository (ALSTAR) since its inception back in 2009 and Martin serves as its Product Owner under an Agile environment. Martin has been an integral part of revamping this legacy program, introduced back in 1982. Martin has also taken on the duties of Assistant Director since 2019. He holds a B.S. degree in Business Marketing. Martin also holds Agile certificates for

Certified Scrum Master (CSM), and Certified Scrum Product Owner (CSPO) and has served on numerous boards over the years.



Lauren Myers

Lauren Myers is the Regulatory Innovation Manager at Royal Canin located in their St. Charles, Missouri office. With a background in Biochemistry and Biotechnology, she works cross-functionally to enable new and ground-breaking cat and dog first innovations on a global scale, but with a US central focus. She is also responsible for the Food Safety Modernization Act (FSMA) regulatory responsibilities as well as dossier writing. Lauren brings over 10 years of experience with areas of expertise in Cat and Dog foods, Animal Chews, Treats, Supplements, and Drugs, Consumer pesticide products, 25(B) Products, Pesticide Devices, Aquatics, as well as Fertilizers and Plant Foods. Within her career, Lauren has been an active industry participant leading countless industry work groups, speaking at multiple industry and state level assembly's and conferences, and previously chairing the NPIRS Advisory Council at Purdue University. Lauren is also a NPIRS Lifetime member and the recipient of many other awards and accolades. In her spare time, Lauren enjoys traveling the world, singing, and spending quality time with close family and friends.



Peter Tabor

Peter Tabor serves as the vice president of Regulatory and International Affairs for the Pet Food Institute (PFI). He coordinates PFI's interaction with federal and state regulatory officials, as well as engages US and foreign government officials regarding market access for US pet food products. Prior to joining PFI, Peter served in variety of capacities in the US Department of Agriculture Foreign Agricultural Service (FAS), most recently as the director of the plant division. During his tenure with FAS, Peter was charged with addressing export challenges for US plants and plant products. As a senior trade policy advisor for FAS, he also was responsible for negotiations with foreign and domestic stakeholders. Peter earned his bachelor's degree from the University of California, Santa Barbara, his master's degree from the Monterey Institute of International Studies and his juris doctor degree from Loyola Marymount University. A California native, Peter enjoys outdoor activities, including golf and cycling. These activities take a backseat, however, to spending time with his wife, Maria, and son, Nico.

Proficiency Testing Program Committee

2021 AAFCO Midyear Virtual Meeting
Wednesday, January 20, 2021
10:30 am–12:00 pm (EST)

Meeting Access

Full access registration includes the live webcast of this committee meeting. The virtual service provider for this meeting is the same provider AAFCO worked with in August for the 2020 AAFCO Annual Meeting. January 14: Registrants receive their username and password along with a video providing instructions on how to access and use the portal.

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Brenda Snodgrass, Chair

Brenda currently serves as the Chair of the AAFCO Proficiency Testing Program. She is the Assistant Laboratory Director of the Oklahoma Department of Agriculture, Food & Forestry. Brenda began working in the Oklahoma Agricultural Lab as a Feed & Pesticide Chemist in 1996 and became the agency's first full-time Laboratory Quality Manager in 1999. At that time Brenda became active in AAFCO as a member of the Laboratory Methods & Services Committee (LM&SC). While serving on the LM&SC, she was a contributing member of the Quality Assurance Workgroup, helping to revise

& update the AAFCO *Quality Assurance/Quality Control Guidelines for Feed Laboratories* for both the 2007 & 2014 Editions. Brenda holds a BSc. in Analytical Chemistry from Southwestern Oklahoma State University. She is a native Oklahoman whose family still actively farms & ranches in southwestern Oklahoma.

Agenda

- 1) Call to Order
- 2) Review and Approval of Agenda
- 3) Introductions
- 4) Program Leadership and Administrative Update
 - a) Board Liaison
 - b) Accreditation Update
 - c) Survey(s)
 - i) Minerals Scheme – Speciation and update - B Snodgrass and N. Thiex
- 5) Scheme Discussion – A. Crawford, L. Ogden and B. Snodgrass

- 6) Algae Biomass as a potential ingredient to Animal Feed – B. Snodgrass and L. Ogden
- 7) Roundtable
- 8) Adjournment

Notes

[illegible]

Inspections During a Pandemic: Perspectives from CVM, State, and Industry

2021 AAFCO Midyear Virtual Meeting

Wednesday, January 20, 2021

1:30–2:30 pm (EST)



Paul A. Davis

Dr. Paul A. Davis was raised in East Tennessee and was heavily involved in 4-H and FFA livestock projects. He received his Bachelor of Science in Agriculture from Tennessee Technological University. Paul was active in the Block and Bridle Club, Kappa Sigma Fraternity, Delta Tau Alpha Agricultural Honor Society and Animal Science Academic Quadrathlon team. He received the first Tennessee Cattlemen's Association Future Cattle Industry Leader Scholarship, the Joe Scott Memorial Scholarship, and the W. Clyde Hyder Animal Science Award for outstanding senior in animal science. Following a brief stint in the livestock auction industry and with

Moorman's/ADM, Paul attained the Master of Science in ruminant nutrition and beef cattle management, the Master of Agribusiness, and his Doctorate in mineral nutrition for ruminants from the University of Florida. After receiving his Ph.D., Paul was employed in 2005 as a ruminant nutritionist with Tennessee Farmers Cooperative (TFC) and held multiple positions at TFC including Director of Feed and Animal Health. In July 2017, Paul accepted a position with American Feed Industry Association to serve as its Director of Quality, Animal Food Safety and Education. Dr. Davis resides in Lascassas, TN with his wife Rachel and their young daughter, Lexie.



Vinetta Howard-King

Vinetta Howard-King is the director of the Office of Human and Animal Food Operations – East, a program within the Office of Regulatory Affairs (ORA), Food and Drug Administration (FDA). In this role, Ms. Howard-King is responsible for overseeing operational functions (such as inspections/investigations, sample collections, compliance and enforcement activities) in six HAF field divisions and the HAF foreign inspection program. She works directly with senior management in headquarters and in the field, using strategic risk-based approaches towards compliance and enforcement that focuses on impact and results. A few of her previous positions

include senior advisor to the assistant commissioner for operations in ORA, deputy director and staff manager in FDA's Office of Emergency Operations, compliance officer in FDA's Baltimore District, and chemist in FDA's Center for Drug Evaluation and Research. She has served as acting manager in numerous leadership positions in FDA, including lab supervisor, district director, deputy office director, office director, and regional food and drug director. Ms. Howard-King holds a Bachelor of Science degree in biology with a minor in chemistry.

Eric Nelson



George Ferguson

George currently works as the Feed Administrator for the North Carolina Department of Agriculture & Consumer Services, where he is responsible for the management of the NC Food and Drug Protection Division's Regulatory Feed Program. While growing up on a small dairy farm in western NC George developed a passion for agriculture that would eventually bring him to NC State, from where he graduated in 1994 with a BS Degree in Poultry Science. While a student at NC State he had the good fortune to have an advisor who had purchased a small feed mill in Fuquay-Varina, where he would get his start in the feed manufacturing business. After graduation he worked briefly for Perdue Poultry in Ahoskie NC, but found himself drawn back into the world of feed where he

would spend the next 15 years. From farm store management to dealer development and sales, George worked with independent dealers of numerous feed manufacturing firms to include Southern States, Purina Mills and Blue Seal Feeds. In 2012 George transitioned from industry to regulatory, as he accepted the position of Feed Safety Officer within the NC Food and Drug Protection Division, Animal Feed Program. He has since served as the Divisions Compliance Officer and now serves as the programs Administrator.

Ingredient Definitions Committee

2021 AAFCO Midyear Virtual Meeting
Wednesday, January 20, 2021
2:45–5:00 pm (EST)

Meeting Access

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Richard Ten Eyck, Chair

Richard Ten Eyck (pronounced ten ike) was born and raised in Oregon. Richard holds a B.S. in Animal Science from Oregon State University. His 37 years in the feed industry has covered all sides of the business including ingredient buying, farm store sales, nutrition, formulation and state regulatory. He is a past President of the Association of American Feed Control Officials (AAFCO). He has served on several working groups that prepared comments on the FSMA rules and is involved with the NASDA implementation team for the Animal Food Preventive Control Framework for

states. He is currently the Feed Safety Specialist with the Oregon Department of Agriculture. The one-person state program regulates 400 mills making 5000 products. He volunteers with Association of American Feed Control Officials (AAFCO) as chair of the Ingredient Definitions Committee and member of the Feed Labeling Committee. Richard lives on the historic family farm in Sandy, Oregon raising goats, Christmas trees and hay. He has been married to his wife Kim for 40+ years and has two adult daughters. He's a grandpa and a Leader of the local 4-H livestock club.

Agenda

(Panel please mute your line when not talking)

Complimentary conference line: <https://aafco-mym21.performedia.com>

Committee please log in 10 minutes prior for Roll and audio check.

Roll call on Google Doc–Displayed–Kent Kitade

- 1) *Hemp Update – Falina Hutchinson, MT (5 min)
- 2) Modification of [Human Grade](#) Feed Term – (10 min) Kim Truett
- 3) ~~GRS Notice (placeholder)~~ Nathan (5min) (need form)

- 4) [T33.29 Black soldier fly larvae oil](#) publish a new tentative definition – 10 minutes – Richard Ten Eyck
- 5) [9.57 Poultry](#) edit definition - Stan Cook, (10 minutes)
- 6) [9.71 Poultry meal](#) edit definition - Stan Cook, (5 minutes)
- 7) ~~New Ingredient CVM Placeholder (10 min) – TBD~~
- 8) Move [T60.117\(B\) Dried Black Soldier Fly Larvae](#) (incl swine) to Official and delete current 60.117. – (10 min) Erin Bubb
- 9) New tentative definition [T60.117 \(C\) Dried Black Soldier Fly Larvae](#) to add an intended use in adult dog food. (10 min) Erin Bubb
- 10) **90.27 (NEW Table)** Pet food parenthetical [Vitamin common name table](#) (investigator update with action item) (need to delete left column of table)--- Tom Phillips (10 min) Motion to publish new table in the OP.
- 11) Header for [22.1 animal protein products](#) and [22.4 plant protein products](#) should be edited (10 Min)– Jacob Fleig
- 12) Edit to Flavor [table 87.30](#) Quebracho bark (5 min) – Richard
- 13) **Break (10 minutes) 90 minutes in**
- 14) Not-Defined workgroup- Common Food Index Proposal, – Kent Kitade (20 min) (need proposal)
- 15) ODI Subcommittee report - ODI table to front of OP? (placeholder) – (10 minutes) –Jacob or Kelli
- 16) Any Budget requests for 7/1/21 – 6/30/22? (5 min) – Chair
 - a. Ingredient definitions workshop august 2021 -- \$ _____ in \$ _____ out
 - b. _____
- 17) NANP Subcommittee report – (5 min) Ashley Shaw (new member)/Casey/Al
- 18) MSBC update, Workgroup Membership recruitment (10 minute) – Chair
- 19) Discussion: [73.107](#) Edit Lignin Sulfonate to call out all forms? Add after the cfr citation “Feed labels may list the appropriate specific salts “ammonium Lignin Sulfonate,” “calcium Lignin Sulfonate,” “magnesium Lignin Sulfonate,” or “sodium Lignin Sulfonate.” (10 min) – Richard Ten Eyck / Kristi Smedley
- 20) Review use of finished feed vs complete feed in chapter 6 of the OP. (10 min) – CVM
- 21) Workgroup report on sunseting (withdrawing) procedures for common or usual names in the OP. George F (lead), Maggie Faba, Leah Wilkinson, Kristi Smedley, By-Laws (Ken Bowers), David Edwards CVM, (15 min) – George F.
- 22) Omaha Ingredient Submission workshop – (10 min) – Meagan Davis
- 23) Online training module for ingredient requests. – update (10 min) (pre-record?) Sue Hays, E.D.
- 24) Summary of Investigator Training Fall 2020 – (10 Min) Erin Bubb
- 25) Discussion on making a revision to the Bagasse Term (need form) (10 Min) -- Mark LeBlanc
- 26) Adjourn 5:00 EST

Run time 220 minutes version 10 allocated 135 min

Announcements

- A. Next Meetings: e-meeting **January 27, 2pm EST** and March__ ?__ 2021
- B. New Investigators: (none)
- C. **Stale Ingredients:** The following are being removed from consideration as definition requests. Please submit a new request if still desired.
 - a. Yeast for Ethanol production optimized for glucoamylase. No response to 2017 letter. – Ten Eyck
 - b. Yeast for Distillers – optimized for xylose. No response to 2017 letter. – Ten Eyck
 - c. Enzymes from T. citrinoviride.-- No response to 2018 letter. – Ten Eyck
 - d. Thymol – as a flavor. No response to 2016 letter. – Ten Eyck
 - e. Beta Glucan from mushrooms. No response to 2018 letter. – Ten Eyck
 - f. Erythrocyte extract as a preservative. No response to 2016 letter. – Ten Eyck
 - g. Dried Milk Permeate. No response to 2016 letter. – Kitade
- D. Parking Lot topics:
 - a. ICG Verification workgroup – have not met-
 - b. **FROM PFC (draft):** *Vitamin common names for pet food should be addressed by IDC independent of the PFLM project. Information from the qualitative consumer research should*

Notes

[illegible]

USAPlants SAFHER Project Update

2021 AAFCO Midyear Virtual Meeting

Thursday, January 21, 2021

10:30–11:00 am (EST)



Jennifer Pierquet

Jennifer Pierquet (P-R-Key) joined the Association of Food and Drug Officials (AFDO) in May 2019 as a project manager to oversee two support and maintenance contracts for 20 state inspection systems. She also manages the project work for a future IT platform that will replace the aforementioned systems. In addition, Jenny leads the recall modernization project and Co-Chairs AFDO's Food Protection and Defense Committee. She formerly worked for the Iowa Department of Inspections and Appeals, Food and Consumer Safety Bureau as the Manufacturing Foods Regulatory Program Standards Coordinator and was involved in Iowa's Rapid Response Team. Prior to Iowa, she worked for the Minnesota Department of Agriculture. Jenny received a Master's in Public Health from the University of Minnesota, School of Public Health and is proud alumni of the University of Wisconsin- Madison.

Laboratory Methods and Services Committee

2021 AAFCO Midyear Virtual Meeting

Thursday, January 21, 2021

11:00 am–12:30 pm (EST)

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Kristi McCallum, Co-Chair

Kristi is the Deputy Laboratory Manager for the Colorado Department of Agriculture, Division of Laboratory Services, Biochemistry Laboratory. Kristi has worked for the State of Colorado, Department of Agriculture for 21 years. During her 20+ years at CDA, she has validated and implemented testing for *Salmonella*, *Shigella*, pathogenic *E. coli*, *Listeria*, and toxins such as *Staphylococcus* enterotoxins, and plant toxins in foods and feeds by rt-PCR and ELISA. Kristi oversees the analyses and staff at the Biochemistry Laboratory. Kristi has previously served on the USDA AMS Technical

Advisory Committee for the Microbiological Data Program and the Rocky Mountain Food Safety Committee. Kristi currently serves as a member of the APHL Human and Animal Food Testing subcommittee which assists other state agriculture laboratories in pursuit of ISO17025 accreditation. Kristi has led research work through the Food Emergency Response Network including pathogen testing in fresh produce, Norovirus rt-PCR analysis in foods, and has published a paper for the detection and identification of *Staphylococcal* enterotoxins in foods by ELISA.



Dr. Sharon F. Webb, Co-Chair

Dr. Sharon F. Webb is the Director of Quality at the University of Kentucky, Division of Regulatory Services (UKDRS). During her undergraduate education, she had the opportunity to work at the National Center for Toxicological Research on 2 projects. Upon receiving her Bachelor of Science in Chemistry, she was admitted to Auburn University as a Ph.D. student receiving a full Graduate Assistance in Areas of National Need for Physical Chemistry. After graduation, she became the Manager of the Mass Spectrum Facilities at the University of Alabama, where she was part of a team that

Agenda

11:00 am	Welcome, Introductions, & Adoption of Agenda	Co-Chairs
11:10 am	Review of Committee Roster and Appointments	Group
11:15 am	Presentation on Biomass Algae	Lieve Laurens, National Renewable Energy Laboratory
11:45 am	Vitamin D Method Validation	Dr. Wei Li, Office of the Texas State Chemist
12:00 pm	Presentation of Haz-Mat Survey	Josh Arbaugh, West Virginia Department of Agriculture & Eric Brady, Tennessee Department of Agriculture
12:15 pm	Update from APHL	Robyn Randolph, APHL
12:30 pm	Adjourn	Committee

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This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Model Bills and Regulations Committee

AAFCO 2021 Midyear Virtual Meeting

Thursday, January 21, 2021

12:45–1:30 pm (EDT)

Meeting Access

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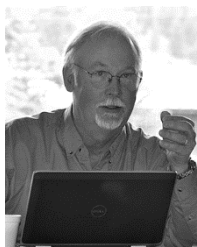
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Doug Lueders, Chair

Recently retired, Doug was the manager of the Minnesota Department of Agriculture's Commercial Feed Program for 16 years. Doug is a past-President of AAFCO, chairs the Model Bills and Regulations Committee and serves on the Feed and Feed Ingredient Manufacturing Committee, Finance Committee, Strategic Affairs Committee, By-Laws Subcommittee, Ingredient Definitions Committee Independent Conclusion of GRAS work group, and FSMA Implementation work group. Other professional volunteer work included being a member of the FDA FSMA

Implementation Team, the FDA Partnership for Food Protection, the FDA Animal Food Safety System, the AFRPS development team, and the FDA Preventative Controls curriculum development team. In his spare time Doug volunteers as a youth firearms safety training instructor, tends his vineyard and along with grandma, spoils their two grandchildren, Hudson and Olivia who are 9 and 7.

Agenda

1. Welcome and Committee Member Introductions
2. 2020 Annual Meeting Minutes (approved as written on 9/20), posted on AAFCO web-site and in the Feed BIN, included in the General Session packet)
3. Committee/Work Group reports – “Labeling” work group report - George
4. Old Business –
5. New Business – What about Flavors? – work group or hand off
 - A. 21 CFR 501.22
 - B. Attached Flavors Power Point

6. Assignments/homework for annual meeting
7. Adjourn

Notes

[illegible]

Keynote Speaker: A Look Toward a New Administration

2021 AAFCO Midyear Virtual Meeting

Thursday, January 21, 2021

1:45–2:30 pm (EST)



Phil Karsting

Phil Karsting is a Senior Policy Advisor at Olsson Frank Weeda Terman and Matz. He previously served as Vice President of Public Policy and Interim President and CEO of World Food Program USA. From May 2013 to January 2017 he served as Administrator of USDA's Foreign Agricultural Service, appointed during the second term of the Obama Administration. He came to the position having worked more than 22 years on agricultural policy in the United States Senate. Immediately prior to joining FAS Karsting served as Chief of Staff to Senator Herb Kohl (D-WI), then Chairman of the Senate Appropriations Subcommittee on Agriculture, Rural Development and Related Agencies. Karsting also served as Senior Analyst on the Democratic Staff of the Senate Budget Committee where he handled issues relating to agriculture, rural development, housing, telecommunications, energy and the environment. He began his Capitol Hill service as Legislative Assistant to Senator Jim Exon (D-NE) where he handled agriculture and natural resource matters. During his time in the Senate he served on the Senate Bi-partisan Chiefs of Staff steering committee and as a Senior Fellow with the John C. Stennis Center for Public Service Leadership. In 2013 he developed curriculum and taught legislative process and committee procedure in Monrovia, Liberia, on behalf of the National Democratic Institute.

Feed and Feed Ingredient Manufacturing Committee

2021 AAFCO Midyear Virtual Meeting

Thursday, January 21, 2021

2:45–3:45 pm (EST)

Meeting Access

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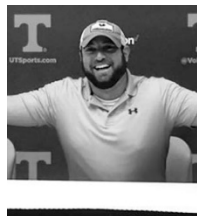
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Committee members—please log on 30 minutes prior to each session to allow the vice chair to determine quorum and to do audio checks.



Austin Therrell, Co-Chair

Austin currently serves as the Feed Program Coordinator for the South Carolina Department of Agriculture where he is responsible for the supervision of the animal feed regulatory program. He graduated from Clemson University with a BS in Animal and Veterinary Science in 2013. Prior to his time at SCDA Austin worked in sales for a family owned pet food company in the sporting dog industry working one on one with trainers and breeders. During his time there he was able to learn about the manufacturing and marketing side of the pet food industry and form relationships with feed dealers and distributors across South Carolina. Austin has served on AAFCO's Pet Food Committee, as a Co-Chair of the Feed and Feed Ingredient Manufacturing Committee, and now as a member of the Board of Directors.



Eric Brady, Co-Chair

Eric Brady is the Statewide Supervisor for Ag Inputs Section for the Tennessee Department of Agriculture. Over the last four years, Eric has overseen daily field operations for the Feed, Seed, Fertilizer, and Lime programs and managed field inspectors across the state. Eric has been involved with AAFCO as the co-chair of Feed and Feed Ingredient Manufacturing and on the training cadres for BITS and AITS. Before this role, Eric was the Stormwater Coordinator for the City of Crossville. Eric holds a Master's degree in Agriculture and Natural Resource Systems Management from the University of Tennessee. In his spare time he enjoys cattle farming and hunting.

Purpose Statement

Working cooperatively with the Food and Drug Administration, Canadian Food Inspection Agency, feed and feed ingredient manufacturers and other relevant domestic and international stakeholders, develop science- and risk-based regulations. Such regulations would support the implementation of effective inspection and compliance strategies as well as be useful in providing education and information to stakeholders. The overall goal is to minimize the presence of chemical, microbiological and physical hazards in animal feeds to the levels necessary to protect human and animal health.

Agenda

- 1.) Welcome and Committee Member Introduction (Eric Brady & Austin Therrell)
- 2.) Review Action Items/Reports from Working Groups and Liaisons
 - Working Group 3 – Contaminant and Hazard Lab Strategy - Brady
 - Working Group 4 – Inspector Training for Ingredient Manufacturing Inspections – Brady
 - Mineral Guidelines Working Group - Therrell
 - Ingredient Verification Tool - Therrell
- 3.) Canadian Regulatory Update (Laura Scott)
- 4.) Industry Stakeholder Updates
- 5.) Other Business

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”.	Update: January 2021
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 2021
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 2021

AAFCO Ingredient Statement Verification Tool
Section Editor – Austin Therrell

Purpose

The purpose of this tool is to assist experienced feed regulatory personnel in the review of feed labels and ingredient lists for accuracy and completeness, specifically regarding the review of the ingredient statement. The tool is designed and structured as a road map to lead the inspector through the process of reviewing documents from the final finished product label to shipping documents in five separate sections.

This tool should be used by trained inspectors along with a commonsense approach when reviewing ingredients in the field with the goal being consumer protection and avoiding potential misbranding issues. Working through the tool may present opportunities for discussion with industry representatives about commercial feed ingredients that are being used and how naming decisions are made.

Additionally, the AAFCO Official Publication contains the most comprehensive list of defined commercial feed ingredients in the world, however there may be ingredients that can't be found within the confines of this book, such as ingredients that are Common or Usual or ingredients that have independently been concluded to be GRAS. The tool has been designed to document these findings to further facilitate discussions with industry with the intent to ensure ingredients are safe and effective for their intended purpose. Egregious misbranding issues should be documented, but please consult individual statutory authority before collecting any documents as evidence.

Inspector Name:

Date:

Manufacturer Name:

Product Name:

Intended Species:

Lot #:

Lot Size:

SECTION 1: INGREDIENT STATEMENT - *This is the labeled, or as stated on an invoice, statement of ingredients that were used in the manufacturing of the feed product. Collect or take a photo of the label and a separate photo of the labeled statement of ingredients as reference to later research the ingredients as being approved and/or defined. Attach label or photos of label to this paperwork. Enter ingredients in Table 1 under Section 1*

~ 1 ~

Notes:

SECTION 2: NAMES OF ADDED PRE-MIXES AND MINERAL PACKS – When physically observing and verifying ingredients and a pre-mix or mineral pack was added to the final manufactured product, note the name of the pre-mix and/or mineral pack next to the name of the labeled ingredient(s) from Section 1 from which it was derived.

Notes:

SECTION 3: INGREDIENT LIST OF THE FORMULA (CONFIDENTIAL) - The following sections of this tool are workable. Indicate (yes) or (no) in Table 1 under Section 3 if the ingredient appears in the master formula. List any discrepancies in the notes section along with receipt numbers or identifiable information.

Notes:

SECTION 4: BATCH RECORD (CONFIDENTIAL) - This specific batch of the named product was produced on Date _____. Indicate Yes or No in Table 1 under Section 3 if the ingredients listed here correspond to the master formula and the Ingredient Statement. List any discrepancies in the notes section along with batch numbers or identifiable information.

Notes:

SECTION 5: SHIPPING DOCUMENTS - Bills of lading provide a wealth of knowledge that include product descriptions, product name, date, and manufacturer information. This paperwork can be crucial to identify if the name and/or description of a product has been modified. Indicate Yes or No in Table 1 under Section 4 if the ingredients listed match the Ingredient Statement.

Notes:

232

50

[illegible]

Firm Manager (print): _____

Firm Manager (signature): _____

Inspector (signature): _____

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Strategic Affairs Committee

2020 AAFCO Annual Virtual Meeting

Friday, August 7, 2020

4:15–5:00 pm (EDT)

Meeting Access

Full access registration includes the live webcast of this committee meeting. The virtual service provider for this meeting is the same provider AAFCO worked with in August for the 2020 AAFCO Annual Meeting. January 14: Registrants receive their username and password along with a video providing instructions on how to access and use the portal.

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Committee members—please log on 30 minutes prior to each session to allow the vice chair to determine quorum and to do audio checks.



Linda Morrison, Chair

Linda has post-graduate education in Animal Science from Macdonald College of McGill University. She has almost three decades experience managing the Feed Program in Canada and was the Director of the Animal Feed Division, Canadian Food Inspection Agency (CFIA) (1982-2012). Linda also worked with the CFIA's Inspection Modernization Office to develop the Integrated Agency Inspection Model for a common approach to inspecting food, animal and plant health. Linda has been an active AAFCO member since 1986. She has served as Chair of the Strategic Affairs Committee for

many years and led Strategic Planning activities. She has served on the Board of Directors and was President in 1998-99. Linda retired from the CFIA in 2016 whereupon she became a Life Member to continue to support AAFCO.

Agenda

1. Introductions and Agenda Review
2. Sub-Committee
 - By-Laws: Ken
 - Board authority regarding Committee recommendations
 - Clarify Board Liaison role for Procedures Manual (WG: Shannon, Erin, Scott and Ken)
 - Clarify Committee Coordinator Role for Procedures Manual (WG: Shannon, Erin, Scott and Ken)
3. Strategic Planning 2017-20
 - Update from Responsible Committees

4. Strategic Planning 2021+
 - Update
5. Procedures Manual
 - Update/clarify Secretary-Treasurer description
 - Update Finance Committee description
 - Strategic Affairs Record August 7, 2020 suggested edits to Recommendations A & C
6. Other business

Action Item Table

Responsible	Item	Action	Timing / Status
By-Laws (Ken)	Board authority regarding Committee recommendations	Investigate whether AAFCO board can kill/amend a committee recommendation (By-Laws, Article VII). Sub-Committee recommends review by legal counsel. Based on counsel's guidance, new language should be drafted in Article VII to clarify.	January 2021
By-Laws (Ken)	Clarify Board Liaison role	Provide additional detail in the Procedures Manual to make the role of the Board liaison clearer respecting review of committee agendas and reports.	January 2021
By-Laws (Ken)	Clarify Committee Coordinator Role	Review Procedures Manual to clarify committee coordinator role and key activities with respect to the process; could include ED as process leader.	January 2021

Appendix 1: By-Law Sub-committee report 06/09/2020

Sub-Committee Recommendations to SAC

- 1) Recommend adding a section in Committee Guidelines in OP and Procedures Manual regarding voting by proxy guidelines. This section would cover proxy voting for general session, board meetings and committee meetings. Edited Proxy Voting Form is attached. **See Attachment A**
- 2) Recommend adding language to Committee Guidelines in OP and Procedures Manual regarding life members have the right to chair an AAFCO committee. AAFCO has long had life members on committees and chairing committee meetings. **See Attachment B**
- 3) Recommend clarifying bylaws Article II section 3 regarding life membership rights. **See attachment C.**
- 4) Recommend adding language to Committee Guidelines in OP and Procedures Manual regarding life members right to vote. **See Attachment D**
- 5) Recommend having the Executive Director, FASS and the Secretary Treasurer manage whether Conflict of Interest provisions should be in contracts. At the previous meeting it was indicated that they already are included in most contracts. **(no document)**

By-Law Sub-Committee Minutes 6/9/20

Sub-Committee Participants present during call on 06/09/2020:

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

Doug Lueders – AAFCO life member absent

The by-law sub-committee discussed items regarding proxy voting for the AAFCO general sessions, committee meetings, board meetings and advisors for committee meetings. We determined this needed added clarity and have made recommendations in attachment A.

We also discussed if AAFCO needs to have a procedure to identify which person from each state is the voting representative. At this time, it is our recommendation that this isn't needed. The process of the association business meeting set up should be handled by the ED and FASS. The President should settle any representation discrepancies before the meeting if possible or during the meeting if needed.

We discussed the process of Advisor substitutions. Proxy is not appropriate for advisors. They are not voting. They are there to provide expertise to the conversation if needed. If advisors wish to have a

substitute for a meeting they must communicate with the president and committee chairs and be prepared to offer written justification for the substitution to the president, if asked

Life member chairing a committee meeting and voting in committee meeting was discussed. It was determined that life members have the right to chair committees and to vote in committee meetings and workgroups. We have a number of life members that stay active in AAFCO. They are experienced former AAFCO members and are often experts in the committee work. Since committee recommendations have to proceed through the Board and membership business meeting voting, there are enough other "member" only votes to ensure careful Association oversight. Life members should not vote in the business meeting of the association.

Call was adjourned about 90 minutes.

Attachment A

Committee Guidelines Page 96 at end of Committee Meeting Operating Procedures also add attached Proxy Voting Procedure form (Attachment A1).

Procedures Manual Page 6

Insert language to read:

Voting by Proxy

General session business meetings:

If a Member agency of AAFCO is unable to participate in the association business meeting, but still wants to vote, the Member agency can designate another Member agency to vote by proxy. The Member agency must email the President and the voting member agency that will proxy for them. The proxy template may be used, but at minimum, the notification must include the following:

- The name of the member agency
- The name of the proxy member agency
- The duration of the proxy

If duration is not specified, the proxy will only be good for one meeting. This must be done prior to the General session business meeting. The president will announce at the meeting if there are any member agencies who have given their voting rights by proxy to another member agency. This will be recorded in minutes.

AAFCO board meetings:

If a board member is unable to participate in a board meeting, but still would like to vote, the board member can designate another board member to vote for them by proxy. The board member must email the President and the board member that will proxy for them. The Proxy template may be used, but at minimum, the notification must include the following:

- Board member's name
- The name of the proxy board member
- The duration of the proxy.

If duration is not specified, the proxy will only be good for one meeting. This must be done prior to the beginning of the board meeting. The president will announce at the board meeting if there are any proxies being used at the meeting. This will be recorded in the minutes.

Committee meetings:

If a committee member is unable to participate in a committee meeting, but still wants to vote, the committee member can designate another committee member to vote for them by proxy.

The committee member must email the committee chair /co-chair and the committee member that will proxy for them. The Proxy template may be used but at minimum the notification must include the following:

- Committee member name
- The name of the proxy committee member
- The duration of the proxy.

If duration is not specified, the proxy will only be good for one meeting. This must be done prior to the beginning of the committee meeting. The committee chair will announce at the beginning of the committee meeting if there are any proxies being used at the meeting. This will be recorded in the minutes.

Attachment B

Committee Guidelines Section Life Members Page 103

Procedures Manual Page 23-24

Add:

Life members have the right to chair AAFCO committees.

Attachment C

Pg. 88, By-laws 2020 OP

Article II Section 3. Life Membership. The Board of Directors shall have authority to bestow life membership upon any individual who has made an outstanding contribution to the work of the Association. Such person shall thereafter be entitled to exercise all the rights of membership with the exception of voting ~~as identified in Section 2 of this Article~~ **in the association's business meetings** but shall be exempt from the payment of annual membership dues.

Attachment D

Committee Guidelines Section Life Members Page 103

Procedures Manual Page 23-24

Add: Life members have the right to vote in committee meetings and workgroups but not the association's general business meetings.

Attachment A1

AAFCO Proxy Voting Procedure

If a Member is unable to participate, but still wants to vote, the Member must follow the Proxy Voting guidance. The Member may complete this Proxy Voting Form or at minimum, provide the below information in an email to the appropriate persons, as outlined in the Procedures Manual. Completion of the form and notification to the appropriate persons, authorizes the Member designated to vote on the absent Member's behalf.

The completed, signed Proxy Voting Form or an equivalent email notification can be provided to the appropriate person and received in advance or at the Meeting stipulated below in order to exercise the proxy vote.

The form conditions are shown below. It is available at: *website and/or Feed BIN location or from Association Management Firm*

Proxy Voting Form

Name of Member Agency

Name of Proxy Agency

I, (printed name to follow)

hereby give my proxy to: (printed name to follow)

I authorize my proxy to vote on my behalf on any item or issue arising at: (stipulated meeting and date to follow)

The proxy designation is valid for the stipulated meeting date(s).

Designated Meeting _____

Signed: _____

Dated: _____

[illegible]

[illegible]