



# 2023 MIDYEAR MEETING **AGENDA BOOK**

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JANUARY 17–19, 2023

HYATT REGENCY SAN ANTONIO RIVERWALK  
SAN ANTONIO, TEXAS

Monday, January 16	
8:00 am–11:30 am	Regency H
<b>Board of Directors and Committee Chairs Meeting</b>	
12:30 pm–7:00 pm	Los Rios Foyer
<b>Registration Open</b>	
1:30 pm–5:30 pm	Regency F, G, H
<b>Ingredient Submission Training Course</b>	
<i>Industry preferred, 1 regulator per state</i>	
6:00 pm–8:00 pm	Chula Vista
<b>AAFCO 101—First-Time Attendee Meet and Greet</b>	
<i>Light hors d'oeuvres served</i>	
<i>All members welcome; first-time attendees highly encouraged to attend.</i>	
Tuesday, January 17	
7:00 am	Los Rios Foyer
<b>Registration Open</b>	
8:00 am	Regency Ballroom
<b>Welcome</b>	
8:45 am–10:15 am	Regency Ballroom
<b>Business Meeting</b>	
10:15 am–10:30 am	Regency Foyer
<b>Coffee Break</b>	
10:30 am–11:00 am	Regency Ballroom
<b>Current Issues and Outreach Committee</b>	
<i>New-attendee recognition</i>	
11:00 am–11:15 am	Regency Foyer
<b>Coffee Break</b>	
11:15 am–12:00 pm	Regency Ballroom
<b>Ray Starling, Executive Advisor, Aimpoint Research</b>	
12:00 pm–1:30 pm	
<b>Lunch (on your own)</b>	
12:00 pm–1:30 pm	Rio Grande West
<b>Investigators Lunch</b>	
<i>Closed session</i>	

1:30 pm–2:15 pm	Regency Ballroom
<b>Education and Training Committee</b>	
1:30 pm–3:00 pm	Rio East and Center
<b>Proficiency Testing Program Committee</b>	
2:15 pm–3:00 pm	Regency Ballroom
<b>Feed and Feed Ingredient Manufacturing Committee</b>	
3:00 pm–3:30 pm	Regency Foyer
<b>Coffee Break</b>	
3:30 pm–4:30 pm	Regency Ballroom
<b>Inspection and Sampling Committee</b>	
3:30 pm–5:30 pm	Rio East and Center
<b>Proficiency Testing Program Committee</b>	
4:30 pm–4:45 pm	
<b>Inspection and Sampling Committee Adjourn/Break</b>	
<i>Industry to clear room</i>	
4:45 pm–5:30 pm	Rio Grande West
<b>Collaboration Committee</b>	
<i>Closed session</i>	

Wednesday, January 18	
7:00 am	Los Rios Foyer
<b>Registration Open</b>	
8:00 am–9:30 am	Regency Ballroom
<b>Ingredient Definitions Committee</b>	
8:00 am–9:30 am	Rio East and Center
<b>Laboratory Methods and Services Committee</b>	
9:30 am–10:00 am	Regency Foyer
<b>Coffee Break</b>	
10:00 am–12:00 pm	Regency Ballroom
<b>Pet Food Committee</b>	
10:00 am–12:00 am	Rio East and Center
<b>Laboratory Methods and Services Committee</b>	
12:00 pm–1:30 pm	
<b>Lunch (on your own)</b>	

12:00 pm–1:30 pm	Rio Grande West
<b>Finance Committee</b>	
<i>Closed session</i>	
1:30 pm–2:30 pm	Rio East and Center
<b>Laboratory Methods and Services Committee</b>	
1:30 pm–2:30 pm	Regency Ballroom
<b>Model Bills and Regulations Committee</b>	
2:30 pm–2:45 pm	Regency Foyer
<b>Coffee Break</b>	
2:45 pm–3:45 pm	Regency Ballroom
<b>Laboratory Methods and Services Committee</b>	
<i>All welcome to attend—Regulatory and Lab Panel Discussion</i>	
3:45 pm–4:00 pm	Regency Foyer
<b>Coffee Break</b>	
4:00 pm–5:30 pm	Regency Ballroom
<b>Enforcement Issues Committee</b>	
<i>Closed session</i>	
6:00 pm–8:00 pm	Garden Terrace
<b>Reception</b>	

Thursday, January 19	
8:00 am–9:00 am	Regency Ballroom
<b>Ingredient Definition Committee</b>	<i>Continued</i>
9:00 am–9:30 am	Regency Ballroom
<b>Ingredient Definition Committee—Algae Presentation</b>	
9:30 am–10:00 am	Regency Foyer
<b>Coffee Break</b>	
10:00 am–11:00 am	Regency Ballroom
<b>Feed Labeling Committee</b>	
10:00 am–11:00 pm	Rio East and Center
<b>Laboratory Methods and Services Committee</b>	
11:00 am–12:00 am	Regency Ballroom
<b>Strategic Affairs Committee</b>	
12:00 pm–2:00 pm	Rio East and Center
<b>Board of Directors and Committee Chairs Meeting</b>	

## 2023 AAFCO Midyear Meeting

View List of the 2023 AAFCO Midyear Meeting Attendees



[www.aafco.org/Meetings/Midyear/2023/Attendee-List](http://www.aafco.org/Meetings/Midyear/2023/Attendee-List)

### Your Thoughts Are Important to Us!

January 17, 2023, Morning Session



January 17, 2023, Afternoon Session



January 17, 2023, Proficiency Testing  
Program Committee Meeting



January 18, 2023, Laboratory Methods  
and Services Committee Meeting



January 18, 2023, Morning Session



January 18, 2023, Afternoon Session



January 19, 2023, Morning Session







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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.**

## General Session Agenda

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas

Tuesday, January 17, 2023

8:00–8:45 am CT

Regency Ballroom

### Agenda

8:00 am Opening Remarks, President Eric Brady, Tennessee Department of Agriculture  
8:05 am Introduction and Welcome to Texas, Ben Jones, Office of the Texas State Chemist



#### ***Meet the Director***

Ben Jones serves as the associate director for the OTSC, which comprises the Texas Feed and Fertilizer Control Service (TFFCS) and the Agricultural Analytical Services (AAS). The TFFCS is the agency charged by law with the regulatory oversight of the feed and fertilizer industries in Texas. In 1985, he began his 38-year public service efforts and has served all facets of the agency, including field investigation, supervisory, management, and administrative duties.

Currently, he serves as the primary compliance officer, represents OTSC on the Texas Rapid Response Team, and is responsible for emergency response and preparedness. He served as president of AAFCO from 2003 to 2004.

8:15 am Presidential Award Presentation, Austin Therrell, Executive Director, AAFCO  
8:20 am Outgoing Presidential Remarks, Immediate Past President George Ferguson, North Carolina Department of Agriculture and Consumer Services  
8:30 am Presentation of 2022 Awards, Immediate Past President George Ferguson, North Carolina Department of Agriculture and Consumer Services

- Presidential Awards
  - o Stan Cook – For his commitment and dedication in representing AAFCO as NASDA liaison.
  - o Jacob Fleig – For his commitment and dedication to AAFCO's work, including his leadership role as Technology Committee chair and committee membership in Education and Training, Inspection and Sampling, Ingredient Definitions, and Current Issues and Outreach.
  - o Hollis Glenn – For his commitment and dedication to the AAFCO Board of Directors.  
Austin Therrell – For his commitment and dedication to the AAFCO Board of Directors.
- Distinguished Service Awards:
  - o Linda Morrison – For her leadership while guiding the Executive Director search and development of the 2023 AAFCO Strategic Plan.
  - o Richard Ten Eyck – For his years of dedicated service and leadership as chair of the AAFCO Ingredient Definition Committee, as well as the significant roles he has filled as a member and mentor in numerous other AAFCO committees.
- Appreciation Awards
  - o Ingredient Submission Workshop Workgroup – Charlotte Conway, Ciro Ruiz-Feria, Kristi Smedley, Falina Hutchinson, Lindsay Meyers, Betty McPhee, Emily Helmes, Stephanie Adams, Meagan Davis, and Nathan Price, for their hard work and contributions to the Ingredient Submission Workshop.
  - o Dave Dzanis – In recognition of his hard work and contributions to the Pet Food Label Modernization Workshop.
- E.B. Vorhees Award, Shannon Jordre – For a career of outstanding vision, leadership, promotion, and dedication to the association and assuring safe animal feed.

8:45 am Association Business Meeting, President Eric Brady, Tennessee Department of Agriculture

## 2023 AAFCO Board of Directors



### **Eric Brady, President**

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, President-Elect**

Josh Arbaugh is a Chemist and Seed Analyst with the West Virginia Department of Agriculture. He graduated from West Virginia University with a BS 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 Committee and the Proficiency Testing Program Committee. Josh lives with his wife, two daughters, and three dogs in Charleston, West Virginia.



### **George Ferguson, Past President**

George Ferguson 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 North Carolina, George developed a passion for agriculture that would eventually bring him to North Carolina State, where he graduated in 1994 with a BS degree in poultry science. While a student at North Carolina 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 Ahsoskie, North Carolina, 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 program's Administrator.



### **Ashlee-Rose Ferguson, Secretary-Treasurer**

Originally hailing from outside of Philadelphia, Ashlee-Rose Ferguson obtained her bachelor of science in wildlife science from the State University of New York: College of Environmental Science & Forestry/Syracuse University. She went on to gain valuable public and environmental health experience with the Washington State Department of Health in the Zoonotic Disease section; Clemson University in the Department of Entomology, Soils, and Plant Sciences; and the 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 the Washington State Department of Agriculture's Animal Feed Program as their Animal Feed Regulatory Program Standards (AFRPS) Coordinator, now Interim 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 include her fiancé, Vladimir, and their three cats: Koca, Luna, and Mickey, and probably a dog soon too).



**Hollis Glenn, Director**

Hollis Glenn is currently the Director of the Inspection and Consumer Services Division for the Colorado Department of Agriculture (CDA). In this role, Hollis oversees several regulatory programs associated with Colorado's agricultural industries, including the Commercial Feed and Produce Safety Program. He serves on the FDA Governing Council for the Partnership for Food Protection. In addition, Hollis was appointed by Governor Polis to serve on the Colorado Food System Advisory Council and was the recipient of the "Who's Who in Agriculture" award in 2020.



**Dan King, Director**

Dan King has worked for the Minnesota Department of Agriculture since 2009 in the commercial feed program, primarily as a compliance officer. Prior to working for the department, he worked at a small, independent coop handling feed, fertilizer, agronomy, and grain storage. Dan has five children, lives on a small farm raising cattle, and is active in local politics.



**Darrell Johnson, Director**

Darrell Johnson has a BS in animal science from Missouri State University and an MS and PhD in ruminant nutrition from the University of Kentucky. He spent 5.5 years as Extension Ruminant Nutrition Specialist at Mississippi State University before returning to Kentucky in 1989 as a Technical Service Specialist for a regional feed company. He became Executive Director of Regulatory Services at the University of Kentucky in 2012. In this role he oversees the direction of feed, fertilizer, seed, and milk regulations in the state. The regulations are set by state statute and are designed to provide

consumers accuracy and completeness in the products they purchase. His division is also responsible for soil testing provided through the Extension Service. He is a member and past president of the American Registry of Professional Animal Scientists and is a Fellow in the American Society of Animal Science. He and his wife, Beth, live on a farm in central Kentucky where they raise cattle and goats. They have two adult children and two granddaughters.



**Laura Scott, Director**

Laura Scott 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 Canadian Food Inspection Agency includes product registration, policy development, and regulatory development. Laura serves on AAFCO's Feed and Feed Ingredient Manufacturing Committee, Ingredient Definitions

Committee, and Inspection and Sampling Committee and as a member of the AAFCO Board of Directors.



**Bailey Whiten, Director**

Bailey Whiten currently serves as the Assistant Division Director of the Ag Inputs Division at the Georgia Department of Agriculture, where she oversees the Feed Program and compliance of the Fertilizer and Seed Programs. She received her BS in animal science and dairy science from the University of Georgia. Bailey is a member of the AAFCO Pet Food Committee, Ingredient Definitions Committee, and Analytical Variances Workgroup. In her spare time, she enjoys camping with her husband and two dogs in their skoolie. Bailey lives with her husband and pets in a small town just

southeast of Atlanta, Georgia.



**Austin Therrell, Executive Director**

Austin Therrell currently serves as the Executive Director for the Association of American Feed Control Officials (AAFCO). Prior to his current role with AAFCO, he served on the Board of Directors and as the Co-Chair of the AAFCO Feed and Feed Ingredient Manufacturing Committee, as a member of the AAFCO Pet Food Committee, and as a member of the Current Issues and Outreach Committee.

Austin previously served as the Animal Feed Program Manager for the South Carolina Department of Agriculture, where he oversaw animal food inspection priorities across the state, product registrations, labeling compliance, and a statewide sampling program. He graduated from Clemson University in 2013 with a bachelor of science degree in animal and veterinary science and a minor in business administration.

## Outgoing AAFCO Board Member

AAFCO would like to thank Erin Bubb for her years of service.



**Erin Bubb** received a BS 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, Bubb 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.

# Association Business Meeting Agenda

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Tuesday, January 17, 2023  
8:45 am–10:15 am CT  
Regency Ballroom

## Agenda

1. **Meeting Called to Order <> CT**
2. **Welcome and Opening Remarks:** Eric Brady, President
3. **Acknowledgement of Awards:** Eric Brady, President
  - Presidential Awards
    - o Stan Cook – For his commitment and dedication in representing AAFCO as NASDA Liaison.
    - o Jacob Fleig – For his commitment and dedication to AAFCO’s work, including his leadership role as Technology Committee Chair and committee member of Education and Training, Inspection and Sampling, Ingredient Definitions, and Current Issues and Outreach.
    - o Hollis Glenn – For his commitment and dedication to the AAFCO Board of Directors.
    - o Austin Therrell – For his commitment and dedication to the AAFCO Board of Directors.
  - Distinguished Service Awards:
    - o Linda Morrison – For her leadership while guiding the Executive Director Search and development of the 2023 AAFCO Strategic Plan.
    - o Richard Ten Eyck – For his years of dedicated service and leadership as Chair of the AAFCO Ingredient Definition Committee, as well as the significant roles he has filled as a member and mentor in numerous other AAFCO committees.
  - Appreciation Awards
    - o Ingredient Submission Workshop Workgroup – Charlotte Conway, Ciro Ruiz-Feria, Kristi Smedley, Falina Hutchinson, Lindsay Meyers, Betty McPhee, Emily Helmes, Stephanie Adams, Meagan Davis, and Nathan Price, for their hard work and contributions to the Ingredient Submission Workshop.
    - o Dave Dzanis – In recognition of his hard work and contributions to the Pet Food Label Modernization Workshop.
  - E.B. Vorhees Award, Shannon Jordre – For a career of outstanding vision, leadership, promotion, and dedication to the association and assuring safe animal feed.
4. **Roll Call:** Eric Brady, President
5. **Acceptance of Committee Reports from:** Current Issues and Outreach, Education and Training, Feed and Feed Ingredient Manufacturing, Feed Labeling, Inspection and Sampling, Ingredient Definitions, Ingredient Definitions eMeeting 09/16/22, Laboratory Methods and Services, Model Bills and Regulations, Pet Food, Proficiency Testing Program, Strategic Affairs – Josh Arbaugh, President-Elect  
(Reports are published on the AAFCO website on the 2023 Midyear Meeting page, right side, under the heading “Committee Reports.”)  
**< > moves to accept committee reports. < > seconds. Motion < >.**
6. **Acceptance of Committee Recommendations:** Eric Brady, President
  - a. **Ingredient Definition Committee Recommendations:**
    - i. IDC Recommends publishing the CFI procedures in the 2023 OP on page 336.  
**AAFCO COMMON FOOD INDEX PROCEDURES**  
**Introduction**  
The Common Food Index Subcommittee was established by the AAFCO Ingredient Definitions Committee (IDC) as the body to facilitate the addition of new items to the Common Food Index (CFI). Members of the CFI Subcommittee are appointed by the Chair of the Ingredient Definition Committee. The number of members, identification of the subcommittee chair, and terms of service are at the discretion of the IDC Chair. The IDC Chair should consider the volume of work and availability of the volunteers when

making these appointments. This document will describe how items are added to the CFI. All the items in the CFI must meet the AAFCO Feed Term “Common Food” as found in the AAFCO Official Publication. The CFI will reside on the AAFCO.org website and within the AAFCO Online Database of Ingredients (ODI).

#### **Procedures**

- 1) Suggesting additions to CFI – Initiating the process
  - a. A suggestion may be made by any stakeholder (consumer, regulator, CFI Subcommittee, industry representative, etc.)
  - b. A suggestion is made by completing the CFI Worksheet found on AAFCO.org
  - c. More information may be requested by CFI subcommittee if needed/helpful to confirm that the suggestion meets the criteria in the AAFCO feed term “Common Food”
- 2) Reviewing the suggestions received
  - a. The CFI Subcommittee Coordinator (with the assistance of the CFI Subcommittee) will review the submission. The Subcommittee will notify the submitter if the item will be posted for public review or if the item will not be accepted by the subcommittee within 30 days of the submission.
  - b. The responses to the questions on the worksheet broadly establish a profile for the suggested item. The profile must fit the criteria set in the AAFCO Feed Term “Common Food”
  - c. Review of the submissions will be conducted as they are received. Suggestions that meet the AAFCO feed term “Common Food” will go for public comment in monthly intervals
  - d. Suggestions that do not meet the AAFCO feed term “Common Food” will also be included in the CFI Subcommittee report to IDC with explanation on criteria not met.
- 3) Public Comment Period
  - a. Pending additions to the CFI are posted monthly on AAFCO.org and in the Feed Bin with submission of comments to a portal.
  - b. A notice targeting animal nutritionists (ARPAS), veterinarian toxicologists (ABVT), veterinarians, FDA-CVM, USDA, consumer groups, and general public is issued. The notice should encourage animal scientists to share their professional opinion including support of/disagreement with inclusion into the CFI.
  - c. Duration: Although comments on the safety of items listed in the Common Food Index are always accepted, comments received within 30 days of posting will be evaluated by the subcommittee.
  - d. The CFI Subcommittee should screen the comments as they are received to avoid a backlog
  - e. Public comments are reviewed as to the product’s risk, utility, and appropriateness for that item’s inclusion in the CFI by the CFI Subcommittee
- 4) Reporting to Ingredient Definition Committee
  - a. Suggestions that pass through the public comment period without issue will be listed in the CFI Subcommittee report to IDC
  - b. Suggestions that do not pass the screening process will also be reported to IDC along with summarized comments to explain what criteria were not met
  - c. CFI Subcommittee shall submit their report at least 30 days prior to the next IDC meeting
- 5) Acceptance of common foods into the CFI
  - a. The IDC will vote to accept the CFI Subcommittee report
  - b. The IDC can discuss the CFI Subcommittee’s findings
  - c. IDC has the prerogative to amend the findings
  - d. In a separate vote, IDC shall vote whether to accept the recommendations for indexing with or without modifications
  - e. Upon acceptance of the IDC meeting minutes by the AAFCO Board of Directors, the new common foods will be added to the CFI.
  - f. New additions will be noted in the ODI Change Table found in the AAFCO Official Publication biannually.

- 6) Removal of indexed items from the CFI
  - a. CFI Subcommittee receives new information that raises a safety or other concern.
  - b. The CFI Subcommittee immediately alerts the IDC chair of the new information and may recommend the removal of the indexed item from the CFI.
  - c. The IDC chair may elect to remove the item immediately from the CFI in the case of an emergency, or otherwise refer to IDC for vote.
  - d. The CFI Subcommittee recommendation to IDC chair will be reported to the IDC.
  - e. The IDC shall acknowledge the removal at its next meeting by accepting the CFI Subcommittee report. The IDC has the prerogative to override the removal.
  - f. Items removed from the CFI shall be posted on the "Withdrawn from CFI" list in the IDC library in the Feed BIN.
- 7) Appeal Process
  - a. Any stakeholder may appeal an IDC decision regarding CFI listings by providing further information for the subcommittee to evaluate.
  - b. Actions subject to appeal
    1. Subcommittee decision to not accept for public review
    2. IDC decision to accept or not to accept an item for inclusion in the CFI
    3. IDC decision to remove an item from the CFI
  - c. An appeal can be submitted by emailing [aafco@aafco.org](mailto:aafco@aafco.org)
  - d. While there is no deadline to file an appeal, it is preferred that one is filed as early as possible after the IDC vote on the item in question to avoid unnecessary or duplicative work.
  - e. The appeal will be discussed by the CFI Subcommittee. The subcommittee's recommendation shall be included in the next CFI Subcommittee report to the IDC.
  - f. The IDC's vote on the appeal is final.

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- ii. IDC Recommends publishing the CFI worksheet on the AAFCO website (set up new portal).

#### **AAFCO Common Food Index (CFI) Worksheet**

**Version 8/4/22**

**Status: Accepted by IDC**

**Common foods** (AAFCO Feed Term) – Common foods are commercially available and suitable for use in animal food but are not defined by AAFCO, including but not limited to certain whole seeds, vegetables, or fruits. Common food for animals may include common human foods that are known to be safe for the intended use in animal food. Manufacturers are responsible for determining whether a common food is safe and has utility for its intended use prior to commercial distribution as animal food.

To submit an ingredient to be added to the AAFCO Common Foods Index, please complete the following worksheet. The worksheet will help the Common Food Index Subcommittee determine if the ingredient meets the qualifications of a Common Food as described in the AAFCO feed term.

The worksheet has YES and NO responses denoted in Green or Red to help guide the submitter if the suggested item meets the definition of "common food." Green responses may indicate that the suggested item complies with the Common Foods feed term. The red responses may indicate that the suggested item **does not** comply with the Common Food feed term. The responses in black provide further information for the CFI Subcommittee.

Name:

Affiliation: Regulator, Firm, or Consumer:

Email address:

Name of ingredient:

General description of the ingredient:

*Date of submission: (assigned by software)*

1. Is the purpose of the item other than providing general nutrition, taste, aroma, or technical effect? **YES** or **NO**
  - a. If YES, what is the general purpose?
2. Is this a single item and not a combination of items (mixed)? **YES** or **NO**
3. Is the item defined by AAFCO or otherwise exist in chapter 6 of the AAFCO Official Publication, OR already exists in the CFI/ODI? **YES** or **NO**
4. Does the submitter have adequate safety data and information available for this item? **YES** or **NO**
5. Is the item a refined product or a fraction of a whole ingredient? **YES** or **NO**
6. Is the item a manufactured or synthetic substance? **YES** or **NO**
7. Is the item distributed with a therapeutic health claim? **YES** or **NO**
8. Is the item commercially available in the United States? **YES** or **NO**
  - a. If NO, is the item only commercially available in another country? **YES** or **NO**
  - b. If 3.a. is YES, then which country?
9. Is the item a conventional human food? **YES** or **NO**
10. Is this item a human food supplement under DSHEA? **YES** or **NO**  
(DSHEA – Dietary Supplement Health Education Act)
11. Is the item a by-product of a food manufacturing process? **YES** or **NO**
12. Has the item undergone a manufacturing process (drying, cooking, grinding, fermenting, pureed, etc.)? **YES** or **NO**
  - a. If YES, what is the process?
13. Is the item intended for use by ALL animal species? **YES** or **NO**
  - a. If NO, why?
  - b. Intended for which species?

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- iii. IDC recommends replacing the existing CFI policy in the 2023 OP on page 335 with the below:

#### **Common Food Index Guidelines**

Editor: Chair of Ingredient Definitions Committee

Version 8/4/22

#### **Purpose:**

The Common Food Index (CFI) is a repository of common foods that may be appropriate for use in animal food and are not defined by AAFCO. The CFI is provided as a tool for use during review of ingredients on an animal food label and provides harmonization and transparency. Label reviews will continue to rely on the expertise of the individuals performing the reviews. The acceptance of indexed items in animal food continues to be at the discretion of regulatory agencies.

These common foods must align with the feed term Common Foods in the Feed Terms and Definitions within Chapter 6 of the AAFCO *Official Publication*. The CFI is not a substitute for the AAFCO process for new feed ingredient definitions; Chapter 6 of the *Official Publication*, alone, contains the officially recognized feed ingredient definitions.

#### **Subcommittee:**

A CFI subcommittee of four (4) AAFCO members will be appointed by the Chair of the Ingredient Definition Committee (IDC).

The subcommittee will investigate the proposed common foods alone or with assistance of experts anytime the subcommittee deems it necessary. Experts are not limited to regulatory officials or academia and may include other stakeholders with relevant knowledge. Experts shall declare any conflicts of interest as a condition of consideration of their participation.

#### **Indexing:**

The CFI will be maintained on the AAFCO.org website and the indexed common foods incorporated into the Online Database of Ingredients (ODI) for reference.

#### **Note:**

Feed/food manufacturers are still responsible for evaluating and documenting the safety of all ingredients for their intended use prior to distribution.

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- iv. IDC recommends publishing an amended **33.16 Methyl Esters of Conjugated Linoleic Acid** to reflect the CFR amendment on page 402 of the 2023 OP.

**33.16 Methyl esters of conjugated linoleic acid (cis-9, trans-11 and trans-10, cis-12-octadecadienoic acids)** may be safely used in swine feed and feed for early lactation dairy cows (less than 100 days-in-milk) in accordance with the prescribed conditions:

- (a) The food additive is manufactured by the reaction of refined sunflower oil with methanol to produce fatty acid methyl esters, which then undergo conjugation to yield methyl esters of octadecadienoic acid. The additive consists of not less than 28 percent methyl ester of cis-9, trans-11-octadecadienoic acid, and not less than 28 percent methyl ester of trans-10, cis-12-octadecadienoic acid with the sum of the other methyl esters of octadecadienoic acid not to exceed 4 percent. The additive shall contain not less than 35 percent of other fatty acid esters composed of oleic acid, palmitic acid, stearic acid, linoleic acid, and other associated acid esters.
- (b) The additive is used or intended for use in the feed of:
  - (1) growing and finishing swine as a source of fatty acids at levels not to exceed 0.6% in the finished feed.
  - (2) early lactation dairy cows to reduce the energy concentration in milk when fed at levels not to exceed 33 grams per cow per day.
- (c) The additive meets the following specifications:
  - (1) Free methyl alcohol not to exceed 0.015%.
  - (2) Insoluble impurities not to exceed 0.1%.
  - (3) Moisture not to exceed 0.5%.
  - (4) Unsaponifiable matter not to exceed 1.0%.
- (d) To assure safe use of the additive, in addition to the other information required by the act:
  - (1) The label and labeling of the additive and any feed premix shall bear the following:
    - (i) The name of the additive.
    - (ii) A statement to indicate that methyl esters of conjugated linoleic acid (cis-9, trans-11 and trans-10, cis-12 octadecadienoic acids) must not be added to vitamin or mineral premixes.
  - (2) The label and labeling of the additive, any feed premix, or complete feed prepared there from shall bear adequate directions for use.

21 CFR 573.637 (Proposed 2009, Adopted 2013, Amended XXXX)

**NOTE:** Items in bold represent the changes.

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- v. IDC recommends publishing a new tentative definition for **T36.11(a)**, to add *Lentilactobacillus hilgardii* on page 407 of the 2023 OP.

**36.11 Dried \_\_\_\_\_ Fermentation Product** is the product derived by culturing \_\_\_\_\_ on appropriate nutrient media for the production of one or more of the following: enzymes, fermentation substances, or other microbial metabolites, and dried in accordance with approved methods and good manufacturing practices. Protein, amino acids, fat, fiber, cell count, enzyme activity or nutrient metabolite level shall be guaranteed where applicable. Use of *Lactobacillus buchneri* and *Lentilactobacillus hilgardii* is limited to silage and high moisture corn grain in plant inoculant products. [For label identification the source must be indicated such as *Bacillus subtilis*, *Aspergillus oryzae*, *Aspergillus niger*, *Lactobacillus acidophilus*, *Lactobacillus buchneri*, *Lentilactobacillus hilgardii*, *Lactobacillus bulgaricus delbrueckii* or *Enterococcus faecium*, or as permitted by FDA.] (Proposed 1976, Adopted 1983, Amended 1997, Amended 1999, Amended 2001, Adopted 2003, Amended 2010, Adopted 2014 rev.1, Amended XXXX)

~~IFN 5-06-154 Lactobacillus bulgaricus fermentation product dehydrated~~

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- vi. IDC recommends publishing **T42.25 Grain Sorghum Protein Feed** as Tentative on page 413 of the 2023 OP, removing “Grain Sorghum Gluten Feed” in the 2025 Official Publication.

**T42.25 Grain Sorghum Protein Feed** is that part of the grain of grain sorghums that remains after the extraction of the larger part of the starch and germ, by the processes employed in the wet milling manufacture of starch or syrup. Originally called Grain Sorghum Gluten Feed (adopted 19XX, amended xx, amended 2023). Remove “42.2 Grain Sorghum Gluten Feed” in the 2025 Official Publication.



(Adopted 19XX, Amended 19XX, Name amended 2023)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- vii. IDC recommends publishing **T42.35 Grain Sorghum Protein Meal** as Tentative on page 413 of the 2023 OP, removing “Grain Sorghum Gluten Meal” in the 2025 Official Publication.

**T42.35 Grain Sorghum Protein Meal** is the part of the grain of grain sorghums that remains after the extraction of the larger part of the starch and germ, and the separation of the bran by the processes employed in the wet milling manufacture of starch or syrup. Originally called Grain Sorghum Gluten Meal (adopted 19XX, amended xx, amended 2023). Remove “42.3 Grain Sorghum Gluten Meal” in the 2025 Official Publication. Name amended 2023

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- viii. IDC recommends publishing an editorial change to **48.18 Hydrolyzed Corn Protein**, Gluten Protein on page 414 of the 2023 OP.

**48.18 Hydrolyzed Corn Protein** is the product resulting from complete hydrolysis of isolated corn ~~gluten~~ protein, and after partial removal of the glutamic acid. (Adopted 1956, revised 2023)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- ix. IDC recommends publishing **T48.135 Corn Protein Feed** as Tentative on page 416 of the 2023 OP, removing “Corn Gluten Feed” in the 2025 Official Publication.

**T48.135 Corn Protein Feed** is that part of the commercial shelled corn that remains after the extraction of the larger portion of the starch, protein, and germ by the processes employed in the wet milling manufacture of corn starch or syrup. It may or may not contain one or more of the following: fermented corn extractives, corn germ meal. Originally called corn gluten meal (adopted 1936, amended xx, amended 2023). Remove “48.13 Corn Gluten Feed” in the 2025 Official Publication.

(Adopted 19XX, Amended 19XX, Name amended 2023)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- x. IDC recommends publishing **T48.145 Corn Protein Meal** as Tentative on page 416 of the 2023 OP, removing 48.14 Corn Gluten Meal from industry use by 2025.

**T48.145 Corn Protein Meal** is the dried residue from corn after the removal of the larger part of the starch and germ, and the separation of the bran by the process employed in the wet milling manufacture of corn starch or syrup, or by enzymatic treatment of the endosperm. It may contain fermented corn extractives and/or corn germ meal. Originally called corn gluten meal (adopted 1936, amended xx, name amended 2023). Remove “48.14 Corn Gluten Meal” in the 2025 Official Publication.

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xi. IDC recommends publishing **T71.41 Low Glucosinolate High Erucic Acid Rapeseed Meal, Mechanically Extracted\*\*** on page 451 of the 2023 OP.

**T71.41 Low Glucosinolate High Erucic Acid Rapeseed Meal, Mechanically Extracted,\*\*** is the meal obtained after the removal of most of the oil by mechanical extraction of whole seeds obtained from the genus *Brassica* [*Brassica napus*, *Brassica rapa*, or *Brassica juncea*] from which the oil shall contain more than 2% erucic acid and the solid component shall contain less than 30 micromoles of any one or any mixture of 3-butenyl glucosinolate, 4-pentenyl glucosinolate, 2-hydroxy-3-butenyl glucosinolate, 2-hydroxy-4-pentenyl glucosinolate, and allyl glucosinolate per gram of air dry, oil free solid. When produced from *Brassica juncea* it must also contain less than 5 micromoles of allyl glucosinolates per gram of air dry, oil free solid. It must contain a maximum of 6% erucic acid, a maximum of 12% crude fiber, and a maximum of 30 micromoles of glucosinolates per gram. It is used in the diets of animals as a source of protein, not to exceed a 5% inclusion rate.

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xii. IDC recommends removing 73.200 Xanthan Gum from the 2023 OP on page 466, and publishing **T73.200 Xanthan Gum** as tentative on page 468 of the 2023 OP, to allow its use as a suspending agent in plant inoculant products.

**T73.200 Xanthan Gum** as per 21 CFR 573.1010 is classified as a food additive as a stabilizer, emulsifier, thickener, suspending agent, or bodying agent in calf milk replacer

and liquid feed supplements. Also per informal review processes, it can be used in canned dog and cat foods **and as a suspending agent in plant inoculant products**. Maximum inclusion levels are 0.1% in calf milk replacers (as fed), and 0.25% in liquid feed supplements and canned dog and cat foods, **and 2% in plant inoculant products**. (Proposed 2013, Adopted 2015 rev. 1, **Amended XXXX**)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xiii. IDC recommends publishing an Addition to table 101.1 AGRN44 **Endo-1,4-Beta xylanase enzyme** on page 544 of the 2023 OP.

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)
44 (PDF - 424 pages)	BioResource International, Inc.	Xylanase enzyme prepared from <i>Komagataella phaffii</i> expressing the gene encoding xylanase from <i>Orpinomyces</i> sp.	Endo-1,4-β-xylanase enzyme	Utility information not evaluated for GRAS, see FDA's letter for more information.	Swine and Poultry	2/25/21	FDA has no questions. (PDF – 4 pages)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xiv. IDC recommends publishing an Addition to table 101 AGRN 48 **Dried L-Valine Fermentation** on page 544 of the 2023 OP.

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)
48 (PDF – 1119 pages)	CJ CheilJedang Corporation	Dried L-Valine Fermentation Product	Dried L-Valine Fermentation Product	To be used as a source of L-Valine in livestock and poultry feed.	Livestock and Poultry	5/14/21	FDA has no questions. (PDF – 4 pages)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xv. Make the following changes in ODI: (tentative ingredients do not go into ODI) \*\*

Action	Ingredient Name	Reference	Comments (meeting)
New name and reference	Fumonisin Esterase		Business meeting xx/xx/xxx
New name and reference	Endo-1,4-β-xylanase enzyme		Business meeting xx/xx/xxx
New name and reference	Dried L-Valine Fermentation Product		Business meeting xx/xx/xxx

\*\*ODI updating—in order to add transparency of the impact of committee decisions on the Online Database of Ingredients (ODI) label validation tool, the committee recommendations will include a table of the anticipated changes to ODI to reflect changes to common or usual names and/or references in the OP. It is anticipated this

table will also appear in the front of the OP with the dates of adoption by the Association Membership. OP section editors are responsible for the accuracy of the ODI updates.

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xvi. Publish changes to the feed term “Gluten” on page 357 of the 2023 OP.

**Gluten.** (part) The tough, viscid, and complex mixture of proteins remaining when the flour of wheat, rye, barley, or their crossbred hybrids, and derivatives thereof, is washed to remove the starch.

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xvii. Publish T12.8 Barley Protein Concentrate as official on page 375 of the 2023 OP.

**12.8 Barley Protein Concentrate** is the dried protein fraction of barley prepared by enzymatic hydrolysis of starch, beta glucans, and fiber. The ingredient is prepared from barley that is dehulled or of a hullless variety. It must not contain less than 60% crude protein on a dry matter basis. The finished ingredient should not contain more than 10% moisture. It is to be used in the feed of fish as a source of protein. (Proposed 2022 rev. 1, adopted xxxx)” (delete tentative)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xviii. Publish an update to table 101.1 to include AGRN 42 on page 544 of the 2023 OP.

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)
42 Part 1 (PDF – 307 pages) Part 2 (PDF – 307 pages)	Native Microbials, Inc.	<i>Butyrivibrio fibrisolvens</i> ASCUSDY19	Dried <i>Butyrivibrio fibrisolvens</i> Fermentatio n Product	Utility information not evaluated for GRAS, see FDA's letter for more information	Dairy cattle	2/12/2 1	FDA has no questions. (PDF – 3 pages)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

- xix. Publish a replacement Official Definition **30.01 Fumonisin Esterase** on page 386 of the 2023 OP, immediately after the first sentence in section 30. *The first version was approved by the committee in August of 2022. Since the source of the language is a food additive regulation the new language comes in as official.*

#### **30.01 Fumonisin esterase**

The food additive fumonisin esterase may be safely used to degrade fumonisins in swine and poultry feed in accordance with the following prescribed conditions:

- Fumonisin esterase, a carboxylesterase, is produced by a nontoxigenic and nonpathogenic yeast, *Komagataella phaffii*, genetically engineered to express the fumonisin esterase gene from the bacterium *Sphingopyxis* sp. The 493 amino acid fumonisin esterase enzyme acts to produce hydrolyzed fumonisin and two tricarballic acid molecules. Hydrolyzed fumonisin and two tricarballic acid molecules are the reaction products of fumonisin hydrolysis by this 493 amino acid fumonisin esterase enzyme.
- The additive shall meet the following specifications:
  - The fermentation media for the *Komagataella phaffii* shall not contain methanol.
  - Viable genetically engineered *Komagataella phaffii* shall not be present.
  - One unit of fumonisin esterase activity is defined as the amount of enzymatic activity required to release one micromole of tricarballic acid (CAS 99-14-9) per minute from 100 micromolar fumonisin B1 in 20 millimolar Tris-hydrochloride buffer (pH 8.0) containing 0.1 milligram per milliliter of bovine serum albumin at 30 °C.
- The additive is incorporated at a minimum of 15 units of fumonisin esterase activity per kilogram of complete ~~swine~~ feed:
  - Complete swine feeds cannot contain more than 10 parts per million of total fumonisins.**

- (2) **Complete feed for poultry being raised for slaughter cannot contain more than 50 parts per million of total fumonisins.**
    - (3) **Complete feed for breeding poultry and hens laying eggs for human consumption cannot contain more than 15 parts per million of total fumonisins.**
  - (d) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act:
    - (1) The label and labeling of the additive, any feed premix, and complete feed shall contain the common or usual name of the additive's source, dried *Komagataella phaffii* fermentation product.
    - (2) The label and labeling of the additive and any feed premix shall also contain:
      - (i) Adequate directions for use including a statement that the additive must be uniformly applied and thoroughly mixed into complete feeds;
      - (ii) A guarantee for the minimum amount of fumonisin esterase activity, expressed in accordance with paragraph (b)(3) of this section, and the unit of weight being consistent with the inclusion rate stated in the directions for use;
      - (iii) Appropriate warning and safety precaution statements concerning the additive as a respiratory sensitizer;
      - (iv) A cautionary statement concerning the maximum fumonisin content as established in paragraph (c) of this section.
- 21 CFR 573.485 (Proposed XXXX, Amended XXXX)
- Board recommends acceptance. <> moves; <> seconds; motion <>.**
- xx. Add the following statement to the header (preamble) of sections 40 (page 409 of the 2023 OP) and 60 (page 438 of the 2023 OP): “\*\* This ingredient may contain materials that fit the Swine Health Protection Act’s definition of “garbage” (i.e., meat resulting from food waste streams). If the product is intended for the feeding of swine or used in the manufacture of an ingredient intended for swine, manufacturers using these ingredients should adhere to the provisions of the Swine Health Protection Act where appropriate. (9 CFR Part 166- Swine Health Protection Act)”
- Board recommends acceptance. <> moves; <> seconds; motion <>.**
- xxi. Mark these ingredients with a “\*\*” to indicate a need to follow the swine health act: 40.96 Food Processing Waste, 40.97 Restaurant Food Waste, 60.108 Salvage Pet Food, and 60.117 Dried Black Soldier Fly Larvae.
- Board recommends acceptance. <> moves; <> seconds; motion <>.**
- b. Model Bills and Regulations Committee Recommendation:**
- i. The Model Bills and Regulations Committee recommends the AAFCO Voluntary Self Inspection Plan (VSIP) Pilot Program Structure Section in Chapter Five of the printed 2022 *Official Publication* on pages 278-284 of the 2023 OP be deleted.
- Board recommends acceptance. <> moves; <> seconds; motion <>.**
- ii. The Model Bills and Regulations Committee recommends that Model Regulation 8 (c) 134 of the 2023 OP be modified as follows (new language **bold and underscored**). Non-protein nitrogen **ingredients** defined in the *Official Publication* of the Association of **American Feed Control Officials, when so indicated, are acceptable ingredients in commercial feeds distributed to non-ruminant animals as a source of nutrients other than equivalent crude protein. The maximum equivalent crude protein from non-protein nitrogen sources when used in non-ruminant rations shall not exceed 1.25% of the total daily ration.**
- Board recommends acceptance. <> moves; <> seconds; motion <>.**
- c. Strategic Affairs Committee Recommendation:**
- i. The Strategic Affairs Committee recommends editing the row “***Post Approved Minutes***” in **Table 4 BOD Post-Meeting Deadlines and Responsibilities** on page 94 of the 2023 OP to read “***Post approved minutes in FEED BIN***” “***From: DRAMF***” “***To: Members***” in order to match the language in **Table 2 – BOD Post-Meeting Deadlines and Responsibilities** in the 2022 AAFCO Procedures Manual on page 16.
- Board recommends acceptance. <> moves; <> seconds; motion <>.**

- ii. The Strategic Affairs Committee recommends these suggested changes regarding Life Member privileges. Excerpt from the OP with suggested changes (Guidelines, Page 101, 2023 OP):
  1. **(unchanged)** To qualify for life membership a candidate must have met the following criteria or have performed meritorious service to the Association or to the principals of animal feed control determined by the AAFCO BOD to be equivalent of these criteria:
    - i) The candidate shall have completed a minimum of eight (8) years active committee, investigator, seminar, task force or officer service; or a minimum of fifteen (15) years tenure in a member agency with semi-active or indirect service to the association.
    - ii) The candidate shall have terminated his or her tenure as a feed control official and shall not have accepted a position in any feed control regulated business, trade or professional association servicing the animal feed industry.
  2. **Nomination Procedure: (unchanged)**
  3. **Assessment of Life Membership Nomination: (unchanged)**
  4. **Pause of Benefits: (new language)**
    - i) If the life member accepts a position with an external stakeholder (e.g., animal food industry consultant, representative of any animal food related trade or professional association, etc.) the life member must notify the President of AAFCO. The President will suspend the privileges of life membership until such time as the life member is no longer representing the external stakeholder.
    - ii) If the life member refuses to suspend their privileges, the BOD may choose to suspend or revoke until such time as the individual again meets the condition of life membership as stated.

**Board recommends acceptance. <> moves; <> seconds; motion <>.**
- iii. **Strategic Plan 2023–2025**  
**Finalized Goals and Objectives**  
**Vision** – AAFCO is a trusted leader that safeguards animal and human health.  
**Mission** – AAFCO is a collaborative association that supports members and stakeholders, and promotes a safe feed supply through unified system-based regulation, feed ingredient standards and laboratory operations.  
**GOAL 1: Improve Organizational Infrastructure and Operations**  
 (Improve the organization's infrastructure and operations to be more effective and efficient and dynamic.)  
 Objective 1.1: Evaluate current AAFCO internal protocols and processes to enhance operational efficiencies (tabled to address in future)  
 Objective 1.2: Identify and develop organizational training for AAFCO leaders  
 Objective 1.3: Identify and pursue opportunities that improve financial management and advance organizational health  
**GOAL 2: Enhance Member Support and Education Resources**  
 (Members are supported through the development of tools, resources, education, and other efforts.)  
 Objective 2.1: Be the leading resource of training for animal food regulators and laboratories within 5 years  
 Objective 2.2: Enhance membership through recruitment, support and sustainability  
**GOAL 3: Advance Human and Animal Health and Safety**  
 (Regulatory and laboratory initiatives promote the health and safety of humans and animals.)  
 Objective 3.1: Promote and integrate Animal Food Safety Systems  
 Objective 3.2: Promote and integrate laboratory technology, methods, quality systems, and collaboration in support of Animal Food Safety Systems  
**GOAL 4: Foster External Stakeholder Relationships**  
 (Relationships with external stakeholders are fostered to provide advancement opportunities for the Association.)

Objective 4.1: Identify stakeholders with common interests in order to prioritize, develop, and maintain professional relationships that advance AAFCO's Vision and Mission (tabled to address in future)

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

**d. Nomination Committee:**

The Nominating Committee recommends the following slate for Board of Directors effective immediately.

President: Eric Brady, TN

President-Elect: Joshua Arbaugh, WV

Secretary-Treasurer: Ashlee-Rose Ferguson, WA

Director: Laura Scott, CAN

Director: Dan King, MN

Director: Bailey Whiten, GA

Director: Darrell Johnson, KY

Director: Hollis Glenn, CO

Immediate Past President: George Ferguson, NC

**Board recommends acceptance. <> moves; <> seconds; motion <>.**

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

**7. Credential Report: FASS**

Number of voting members represented:

Number of states in attendance:

Number of countries:

Number of FDA representatives:

Number of life members:

Total meeting attendance:

**8. Meeting Concluded at <> CT.**

## Notes

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## Current Issues and Outreach Committee

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Tuesday, January 17, 2023  
10:30–11:00 am CT  
Regency Ballroom



### Jennifer Combs, Co-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.



### Jo Lynn Otero, Co-Chair

Jo Lynn Otero currently serves as the program manager in the Feed, Seed, and Fertilizer Section for the New Mexico Department of Agriculture. She has been with the department since 2014. She graduated from New Mexico State University with a BS and master's in agriculture extension education. She enjoys spending her free time with her family, going fishing and camping. She is an educator at heart and loves volunteering as a 4-H leader and working on 4-H projects with her boys. Otero serves on AAFCO's Pet Food Committee, Technology Committee, and Education and Training

Committee, and as co-vice chair of the AAFCO Current Issues and Outreach Committee.

### Agenda

5 min	Welcome and Opening Remarks Jennifer Combs, University of Kentucky
5 min	Jo Lynn Otero, New Mexico Department of Agriculture CIOC/Philosophy Workgroup Updates Jennifer Combs, University of Kentucky
10 min	Jo Lynn Otero, New Mexico Department of Agriculture Philosophy Communications New Website Unveiling: Tera Keatts
10 min	AAFCO 101 Update and New Members Jennifer Combs, University of Kentucky
Adjourn	



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## **Keynote Speaker Ray Starling, Executive Advisor, Aimpoint Research**

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Tuesday, January 17, 2023  
11:15 am–12:00 pm CT  
Regency Ballroom



In his role as executive advisor for Aimpoint Research, Ray Starling serves as an invaluable resource on public policy and legal developments that have the potential to impact the agri-food value chain. He is available for special events, select client engagements, and speaking opportunities. He continues to serve as general counsel for the North Carolina Chamber of Commerce and president of the North Carolina Chamber Legal Institute as well.

Prior to joining the North Carolina Chamber team, Starling served as the chief of staff to U.S. Secretary of Agriculture Sonny Perdue, where he coordinated execution of the Secretary's policy agenda for the U.S. Department of Agriculture. Starling focused on regulatory and deregulatory initiatives and acted as a point of contact for stakeholders throughout agriculture and rural communities. He has also served as a principal agriculture advisor to the president of the United States at the White House, chief of staff, lead agriculture advisor, and chief counsel for U.S. Senator Thom Tillis, and general counsel when Tillis was Speaker of the House in the North Carolina legislature. Early in his career, Starling was general counsel to the North Carolina Department of Agriculture and Consumer Services and for Commissioner of Agriculture Steve Troxler.

Licensed to practice law in North Carolina, Starling has private practice experience and has taught agricultural and food law for several years. He has a bachelor's degree in agricultural education from North Carolina State University and a law degree from the University of North Carolina at Chapel Hill. He grew up on a century farm in southeastern North Carolina and credits that experience as having more to do with his career path than any other influence or opportunity. His parents continue to farm, as does his eldest brother. Starling was a national FFA officer and is a former 4-H member. He resides in Raleigh, North Carolina, with his family.

## Education and Training Committee

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Tuesday, January 17, 2023  
1:30–2:15 pm CT  
Regency Ballroom



### **Marissa Kost, Chair**

Marissa Kost was born and raised in Ohio prior to moving to North Carolina to attend college. She graduated from North Carolina State University (NCSU) with a BS in animal science and poultry science. She continued her education at NCSU to receive her MS in poultry science with a minor in statistics. She has worked with the North Carolina Department of Agriculture and Consumer Services in the Animal Feed Program for almost 2 years as an agricultural compliance officer. Kost attended her first AAFCO meeting in January 2018 in Fort Lauderdale, Florida. 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/Roll Call, Opening Remarks**

Marissa Kost, Committee Chair

#### **Workgroup Updates (15–20 mins)**

Leadership Training

Training Endorsement Policy and Tables – Marissa Kost, NC

DigitalChalk Usage

Training Curriculum Update – Kimberly Hull, FDA OTED

#### **Training Availability Updates (10–15 mins)**

FDA OTED Training Update – Kimberly Hull and Traci Kelm, FDA OTED

Training Updates Given in Other Committees – Marissa Kost, NC

Industry Updates Reminder (FFIMC)

AITs and BITS Updates (ISC)

#### **Sub-Committee Updates (5 min)**

Feed Administrator's Seminar Sub-Committee – Rick Manthei, MN

Midyear/Annual Sub-Committee

#### **Workshop Calendar Request Updates (5 mins)**

#### **New Business (5 mins)**

#### **Adjourn**

## Notes

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## Proficiency Testing Program Committee

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Tuesday, January 17, 2023  
1:30–5:30 pm CT  
Rio East and Center



### **Sally Flowers, Chair**

Sally Flowers is the laboratory director at the Kansas Department of Agriculture. Her education includes a BS in animal science (University of Florida), MS in animal science (Penn State), PhD in food science (Penn State), and BS in clinical laboratory science (University of Nebraska Medical Center). She is active in the Association of Public Health Laboratories as a member of the Board of Directors and the Human and Animal Food Committee, as well as in the Association of Food and Drug Officials, the Association of American Feed Control Officials, and the Association of American Plant

Food Control Officials (Magruder Newsletter editor).

### **Agenda**

- 1) Call to Order
- 2) Review and Approval of Agenda
- 3) Introductions
- 4) Program Leadership and Administrative Updates
  - a) Board Liaison – J. Arbaugh
  - b) Accreditation Update – H. Phillips
  - c) Updates to ISO 17043 – H. Phillips
- 5) August 2022 Action Items
  - a) Set up 2023 Program Schemes with new prices and postal rates with open enrollment to begin in November 2022 – B. Snodgrass
  - b) Update on QRM ordering webpage for customer use – B. Snodgrass
  - c) AV Workgroup update – S. Flowers
  - d) Update PTP content on AAFCO website – S. Flowers/B. Snodgrass
- 6) Customer Feedback – B. Snodgrass
- 7) Other Business
  - a) Review survey feedback from 2022 Annual Meeting (St. Louis)
  - b) Roundtable Discussion
- 8) Adjournment

### **Notes**

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## Feed and Feed Ingredient Manufacturing Committee

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Tuesday, January 17, 2023  
2:15–3:00 pm CT  
Regency Ballroom



### **Ken Bowers, Co-Chair**

Ken Bowers has worked with the Kansas Department of Agriculture in the Dairy and Feed Safety Division as the feed program specialist since 2002. Prior to his position with the Kansas Department of Agriculture, he worked for 17 years in the Quality Assurance Department for Farmland Industries in both the food and feed divisions. He served on the AAFCO Board of Directors from January of 2012 to December 2018. He also volunteers for several AAFCO committees.



### **Charles Hubenka, Co-Chair**

Charles (Charlie) Hubenka is currently the AFRPS coordinator and feed program specialist with the State of Nebraska Department of Agriculture. He started with the state in May of 2017, working in livestock imports and the poultry program. In October of 2018, he joined the Commercial Feed Program as an inspector and then moved into the AFRPS coordinator position in March of 2019. As AFRPS coordinator, Hubenka has led the team to achieve full implementation of the standards in March 2020 and maintained full implementation by FDA audit in August of 2022.

Hubenka graduated from the University of Nebraska-Lincoln in 2012 with a bachelor of science degree in animal science–pre-vet. Prior to the Nebraska Department of Agriculture, he was employed in a veterinary clinic as a vet assistant, working primarily with dogs, cats, and exotic pets. Charlie lives in Lincoln, Nebraska, with his wife Rae, son Cormac, dog River, and cat Elliot. In his spare time, he enjoys reading poetry, learning computer and website coding, and kicking the soccer ball with his son.

### **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 (Ken Bowers and Charles Hubenka)
  - 2) Review Action Items/Reports from Working Groups and Liaisons
    - Working Group 3 – Update on Contaminant and Hazard Lab Strategy – Brady
    - Working Group 4 – Update on AITS training – Brady
    - Nutrient Contaminant Working Group Update – Need new lead
    - Workgroup (Ben Jones, Eric Brady, Johnathon Roberts, Dave Fairfield) Update on VSIP Section in Ch.5 – Brady
    - Edits in OP Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients – (need workgroup/Jennifer Kormos)
- New Business:
- Seek input from industry on adding equipment training resources to AAFCO LMS (digital chalk) – workgroup?
  - Definitions differences – Complete feed, total diet, compare Chapter 6 Table 1 and 2 – Louise Calderwood
  - AAFCO Regulatory Program Needs Survey results – Brady/Lab?

- Strategic Plan assignment for 2023–2025. Discussion/workgroups. See Attachments A and B
- 3) Canadian Regulatory Update (Laura Scott)
- 4) Industry Stakeholder Updates
- 5) Other Business

## **Attachment A**

### **Objective 3.1 – Promote and integrate Animal Food Safety Systems.**

Narrative: Develop and promote a food chain focused safety purpose, activities, and coordination for animal food regulatory agencies. Evaluate current system or systems already in place, identify gaps in model bill and regulations, collaborate with State and Federal Regulatory food/feed agencies, establish, and publish guidance materials and resource links. Multiple components are needed to make a strong Animal Food Safety Program that works cooperatively with FDA to advance human and animal health and safety. This objective aims to develop a roadmap that identifies some of the components that are needed to achieve this goal.

#### **Tasks**

- 1) Identify the elements (roadmap) and implement the activities needed to achieve the objective (considering the narrative (above) and tasks (below)). Note: A task related to evaluating the current system and identifying gaps may need to be added.
 

**Responsible:** Feed and Feed Ingredient Manufacturing Committee (FFIMC), Inspection and Sampling Committee (ISC), Enforcement Issues Committee (EIC) (joint meeting of committee leaders to develop the plan)

  - o **Deliverable:**
    - Identify needs, gaps, and strategically plan activities (e.g., roadmap)
    - Realign the following tasks in accordance with the planned elements.
  - o **Timeframe:** Virtual calls before Midyear 2023 (two calls @ 1 hour each) (Chairs, Vices, Board Liaisons, President Elect, ED)
- 2) Align *Chapter 5 of the OP with AFRPS*. (Note: MBR was aligned with FSMA as part of 2017–2020 Strategic Plan. Some committees are already working on parts of Chapter 5 material.)
 

**Responsible:** EIC, ISC, FFIMC, Feed Labelling Committee (FLC), LMSC support (Committees with relevant sections)

  - o **Deliverable and Timeframe:**
    - Identify current gaps by Midyear 2024
    - Update Chapter 5 sections by Dec. 2025

## **Attachment B**

### **Objective 3.2 – Promote and integrate laboratory technology, methods, quality systems, and collaboration in support of Animal Food Safety Systems.**

Narrative: Identify training and method needs of regulatory laboratories, collaborate with State and Federal Regulatory food/feed agencies to obtain methods, establish, and publish Best Practice guidance materials and resource links on AAFCO LMSC website. Design, implement, and provide a training program for state regulatory laboratorians. Establish a Quality Assurance committee under the AAFCO LMSC to update and provide resources related to quality and accreditation. Provide a link on AAFCO website where state regulatory and state laboratory personnel can gain information on laboratory capabilities.

#### **Tasks**

- 1) Identify the elements (roadmap) and implement the activities needed to achieve the objective (considering the narrative (above) and tasks (below)).
 

**Responsible:** FFIM, LMSC (joint meeting of committee leaders to develop the plan)

  - o **Deliverable:**
    - Identify needs, gaps, and strategically plan activities (e.g., roadmap)
    - Realign the following tasks in accordance with the planned elements.
  - o **Timeframe:** Virtual calls before Midyear 2023 (two calls @ 1 hour each) (Chairs, Vices, Board Liaisons, President Elect, ED)
- 2) (Potential element of Task 1) Conduct annual survey of state regulatory programs (SRP) to identify their testing needs. Utilize information obtained from the SRP survey to develop and administer a survey of state laboratories to see what they need to address the needs of the SRP.



**Responsible:** FFIM, LMSC, and include Pet Food Committee (PFC), due to the label modernization changes that will be taking place.

- **Deliverable:**

- Send an annual Regulatory Method Needs Survey to State Regulatory Program Managers to access, rank, and guide laboratory method and resource needs.
- Compile and present results of the survey
- Prioritize needs based on survey results
- Create or charge individual LMSC working groups with obtaining methods, planning training, and creating Best Practice Guidance documents for state laboratories
- Publish resources on AAFCO website

- o **Timeframe:** Summer 2023 (this is being done now), annual each summer after

## Notes

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# Inspection and Sampling Committee

2023 AAFCO Annual Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Tuesday, January 17, 2023  
3:30–4:30 pm CT  
Regency Ballroom



## **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 and 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 the Department of Agriculture and Consumer Services for 13 years. Johnson has been involved with AAFCO as the Feed Labeling Committee co-chair from 2011 to 2013, the Inspection and Sampling Committee chair from 2017 to the present, and as a member of the training cadres for AITS and BITS. Johnson and her husband, Benton, also operate a small family century farm in eastern North Carolina, where they raise swine, cattle, and muscadine grapes.

## **Agenda**

### **3:30 Welcome and Opening Remarks**

Committee Member and Advisors Roll Call

Miriam Johnson: North Carolina Department of Agriculture and Consumer Services

### **3:40 AITS and BITS**

2023 AITS/BITS Schedule: Host cities and proposed dates

Jessica Gore and Miriam Johnson: North Carolina Department of Agriculture and Consumer Services

### **3:45 Work Group Updates**

Progress from Bulk Tote Sampling Method work group

Jamie Spencer: Kansas Department of Agriculture

Bagged Probe Sampling Study – Status/Updates from KY; Committee's thoughts for future of this project.

Jenny Combs: University of KY

Miriam Johnson: North Carolina Department of Agriculture and Consumer Services

Inspector Guidance Tool for PC and cGMP inspections

Miriam Johnson: North Carolina Department of Agriculture and Consumer Services

Progress from AAFCO branded sampling equipment (triers, bags, stream cutters, aseptic scoops, etc.) work group

Jamie Spencer: Kansas Department of Agriculture

### **4:15 Other Topics for Discussion/New Business**

Interest in moving forward with developing an Aseptic Sampling Training course

What additional Request for Proposals need to be developed for further movement of projects based on Work Group updates?

### **4:30 Adjourn**

[illegible]

## Ingredient Definitions Committee

2023 AAFCO Annual Meeting

Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas

Wednesday, January 18, 2023, 8:00–9:30 am CST  
Regency Ballroom

Thursday, January 19, 2023, 8:00–9:30 am CST  
Regency Ballroom



### Richard Ten Eyck, Co-Chair

Richard Ten Eyck (pronounced “ten ike”) was born and raised in Oregon and holds a BS in animal science from Oregon State University. His 37 years in the feed industry have covered all sides of the business, including ingredient buying, farm store sales, nutrition, formulation, and state regulatory. He is a past president of AAFCO, 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 5,000 products. He volunteers with AAFCO as chair of the Ingredient Definitions Committee and as a member of the Feed Labeling Committee.

Ten Eyck lives on a historic family farm in Sandy, Oregon, raising goats, Christmas trees, and hay. He has been married to his wife, Kim, for more than 40 years, and they have two adult daughters. He is a grandfather and a leader of the local 4-H livestock club.



### Erin Bubb, Co-Chair

Erin Bubb received a BS 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, Bubb 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.

## Agenda

### Wednesday, January 18, 2023, 8:00 to 9:30 am CST

Roll call. Members and presenters please arrive 10 minutes early

#### OP Content

- 1) “Finished Feed” Publish new feed term - Ali Kashani and Cynthia Scholte (10)
- 2) “Freeze Dried” Publish new feed term- Ali Kashani (10)
- 3) T33.29(A) Black Soldier Fly Larvae Oil to Official- Bernadette Mundo (5)
- 4) T36.11 \_\_\_\_ Dried Fermentation Product to official- relating to organisms. Allow the use of *Lactobacillus diolivorans* as a silage inoculant. Replace existing official definition- Maggie Faba (5)
- 5) CVM Placeholder #1 (10)
- 6) CVM placeholder #2 (10)
- 7) Publish new Swine Health Protection Act (SHPA) guidance language in Sections 40 and 60. Will replace current SHPA guidance language. - Erin Bubb (10)

#### ODI Maintenance

- 8) ODI Subcommittee report – Jacob Fleig  
Richard and Jacob have been working on the process of building an excel file of ODI changes.
- 9) ODI procedures – Jacob Fleig  
The procedures are in the BIN and are ready for the investigators to pilot. Update: Investigator training?

#### Informational Updates

- 10) CVM discussion of request tracking (20) Charlotte Conway
- 11) Sunsetting workgroup report (10) Ken Bowers

- a) Workgroup report on sunset (withdrawing) procedures for common or usual names in the OP. The scope of this workgroup will be expanded to include how to change a common or usual name.

**Thursday, January 18, 2023, 8:00 to 9:30 am CST**

Roll call. Members and presenters please arrive 10 minutes early

**Informational Updates**

- 1) Animal Protein WG update (20) Stan Cook
- 2) Common Food Index Portal, Next steps (5) Erin Bubb
- 3) Hemp update (5) Falina Hutchinson
- 4) Ingredient Submission Workshop (10) Meagan Davis
- 5) Ingredient submission modules (link to offering in Digital Chalk?) (10) George Ferguson
- 6) Algae Biomass Organization (ABO) presentation (30) Dr. Jesse Traller

**Announcements**

- 7) Next Meetings: Virtual March/April (?) 2023
- 8) New Investigators Needed:
  - a. Marine Products
  - b. Amino Acids
  - c. Enzymes
  - d. Fermentation Products
  - e. DFM
  - f. Technical Additives
  - g. Special Purpose Products
  - h. Preservatives
- 9) **Stale Ingredients:** The following are being removed from consideration as definition requests. Please submit a new request if still desired.
  - a. Faba beans- Pulse Ingredients
- 10) Parking Lot topics:
  - a. Complete gluten review. Dan King
  - b. ICG workgroup report – not met since June 2021 -
  - c. NANP Subcommittee report –have not met -Ashley Shaw /KC/AI
  - d. 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 be provided to the IDC. Work of the IDC common vitamin name workgroup should be quantitatively consumer panel tested preferably at the same time as the PFLM changes. **NEED UPDATE, Review?**
  - e. Pursue formal MSBC Definition. **Nothing in motion**
  - f. Fluorine levels in model bill. Tom Phillips (lab) and Jennifer Kormos (IDC) and FIFM (Ken Bowers) form a workgroup to look at impact of testing and definitions parse out questions for the appropriate committees concerning Flourine vs fluoride.  
*(975.08 AOAC method for fluorine. There are challenges in the methods in animal food and lab capacity. Do we need to send a methods request to LMC? Should Fluorine (gas) be changed to Fluoride in the feed law? (Stan) IDC should look at mineral definitions that have fluorine specifications. May also be in CFR definitions) **Workgroup formed?***
  - g. New feed term Total Ration. Ali Kashani
  - h. Proper use of process terms. Ali Kashani and WG to present at spring virtual meeting?
  - i. Use of definition request tracking sheet
  - j. Next IDC speaker/presenter? Suggestions for topics

(10 minutes)

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## Laboratory Methods and Services Committee

2023 AAFCO Midyear Meeting

Hyatt Regency San Antonio Riverwalk

San Antonio, Texas

Wednesday, January 18, 2023, 8:00 am–2:30 pm CT

Rio East and Center

Wednesday, January 18, 2023, 2:45–3:45 pm CT

Regency Ballroom

Thursday, January 19, 2023, 10:00–11:00 am CT

Rio East and Center



### **Kristi McCallum, Co-Chair**

Kristi McCallum is the deputy laboratory manager for the Colorado Department of Agriculture, Division of Laboratory Services, Biochemistry Laboratory. She has worked for the State of Colorado Department of Agriculture for 21 years, during which time she has validated and implemented testing for *Salmonella*, *Shigella*, pathogenic *E. coli*, *Listeria*, toxins such as *Staphylococcus* enterotoxins, and plant toxins in foods and feeds by rt-PCR and ELISA. She oversees the analyses and staff at the Biochemistry Laboratory. McCallum has previously served on the USDA AMS Technical Advisory

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



### **Sharon Webb, Co-Chair**

Sharon F. Webb is the director of quality at the University of Kentucky, Division of Regulatory Services. During her undergraduate education, she had the opportunity to work on 2 projects at the National Center for Toxicological Research. Upon receiving her bachelor of science in chemistry, she was admitted to Auburn University as a PhD student, receiving a full graduate assistantship 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 working in proteomics,

examining products of ionizations of small proteins. She is currently the director of the Quality Program at the University of Kentucky's Division of Regulatory Services. In addition to her volunteer work with AAFCO, she is an active member of the Association of American Plant Food Control Officials (AAPFCO) Magruder Check Program Committee and Terms and Definitions Committee, and is the vice-chair of their Laboratory Services Committee. She has been an active leader of the Mineral and Trace Metals Group of the Methods Forum, associated with AAPFCO, and the study champion for the Association of Official Analytical Chemists International official method 2017.02. She has been married to Ken Webb for 26 years; has three children, Symantha, Matalyn, and Jacob; and four poodles. She is a lifetime fan of University of Kentucky men's basketball and loves meeting members of the Big Blue Nation when she travels.



### **Dorota Inerowicz, Co-Chair**

Dorota Inerowicz is the supervisor of the Feed Laboratory at the Office of Indiana State Chemist at Purdue University. She has been in this position for over 10 years. Analyses performed by the Feed Laboratory, mainly by chromatographic methods, include animal drug, vitamins, amino acids, and mycotoxins. Additionally, her section also performs other routine analyses such as sugars, starch, various fat analyses, and other requested test procedures, method development, and collaboration. In recent years, her section has also introduced testing for cannabinoids in hemp samples.

After her undergraduate education, Inerowicz earned a PhD in physical chemistry at the Technical University of Gdansk, Poland. She did postdoctoral work at the Swedish University of Agricultural

Sciences in Uppsala and at Oklahoma University. For the past two decades, she has been associated with Purdue University. Before joining the Office of Indiana State Chemist, she held the manager position of the Mass Spectrometry Proteomics Facility at Purdue Discovery Park. Other than her volunteer work with the Laboratory Method and Services Committee at AAFCO, she serves as co-chair of the AAFCO Fat-Soluble Vitamins Working Group.

## Agenda

### Wednesday, January 18, 2023, 8:00 to 3:45 pm CST

- 8:00 am CST Welcome, Introductions, & Adoption of Agenda—Co-chairs  
Review of Committee Roster and Announcements—Co-chairs
- 8:20 am Measurement Error in Lab Prep & Sampling Methods—Nancy Thiex, Life Member
- 9:30–10:00 am **Morning Break/Networking**
- 10:00 am Results from AAFCO Sampling Study KY—Jennifer Combs, KY
- 11:00 am Making the switch from a Fibertech M6 to the Ankom 200 for measuring Crude Fiber: a not so boring tale—Jona Verreth, MT
- 11:30 am APHL Update—Robyn Randolph, APHL
- 12:00–1:30 pm **Lunch on Your Own**
- 1:30 pm Direct-Fed Microorganisms for Animal Feed and Pet Food Guarantee Analysis Labeling Issues and Discussion—Dancia Wu, OISC
- 3:30 pm **Adjourn LMSC Day 1**
- 2:45 pm **Panel Discussion:** During this panel discussion, we will discuss how to better align State Regulatory needs with Laboratory capabilities to foster better communication and aid in planning future trainings and analytical needs that the LMSC should focus on—AAFCO—Regency Ballroom
- 3:45 pm **Afternoon Break/Networking**

### Thursday, January 19, 2023, 10:00 to 11:00 am CST

- 10:00–11:00 am Laboratory Training Needs and Resources—Kristi McCallum, co-chair
- 11:00 am **Adjourn LMSC Day 2**

## Notes



**Pet Food Committee**  
2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Wednesday, January 18, 2023  
10:00 am–12:00 pm CT  
Regency Ballroom



**Stan Cook, Co-Chair**

Since 2011, Stan Cook has managed the Missouri Department of Agriculture Bureau of Feed and Seed. He holds a bachelor of science degree in business administration from Lincoln University and is a graduate of the Missouri Agriculture Leadership of Tomorrow, Class I. Prior to the bureau, Stan served as a loan officer for the Missouri Agricultural and Small Business Development Authority. His experience in Missouri agriculture also includes 25 years in commercial livestock production. He served nine years as a member of the Board of Directors of Farm Credit Services, serving as vice chairman of the Eastern Missouri Farm Credit Board, and has served as a member of the Executive Committee of the Central Production Credit Association Board. He has worked as a USDA Certified Market Reporter, responsible for a voluntary direct price-reporting program for hogs, pigs, and timber, and also as a relief auction reporter. Cook serves on various AAFCO committees and is vice chair of the Strategic Affairs Committee and the Pet Food Committee. He served on the AAFCO Board of Directors from 2014 to 2020 and as its president in 2018. He continues to live and work on a sixth-generation farm near California, Missouri.



**Lizette Beckman, Co-Chair**

Liz Beckman is a feed advisor with the Washington State Department of Agriculture, Animal Feed Program. Her duties currently include country of origin reviews, animal feed standards, and commercial feed licensing. She is also responsible for collection and auditing of inspection fees. Beckman has served on various AAFCO committees. A cat and dog lover, she has two cats and one dog. In her free time, she enjoys gardening, hunting and fishing, and spending time with her niece.

**Agenda**

PFC Welcome and Updates

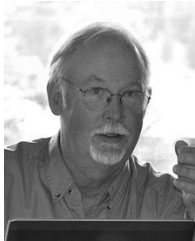
Work Group Reports:

- |             |  |
|-------------|--|
| 10:00–10:05 | Roll Call  |
| 10:05–10:10 | Welcome and Opening Remarks  |
| 10:10–10:20 | Human Grade Guidelines Update  |
| 10:20–11:00 | Copper Expert Panel Report: Summary/Discussion<br>(The report can be found at the above link on the AAFCO/PFC website.)  |
| 11:00–11:45 | PFLM Update <ul style="list-style-type: none"><li>a. PFLM Quantitative Review</li><li>b. PFLM Comments/Questions for Draft Model Regulations</li><li>c. PFLM Implementation Work Group Update – Stan Cook</li><li>d. 50 State Calls – Save the dates</li></ul> |
| 11:45–Noon  | Training and Outreach Sub-Committee Update <ul style="list-style-type: none"><li>a. Pet Food Labeling Guide Update</li><li>b. Training Update</li><li>c. Outreach Update</li></ul>   |

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## Model Bills and Regulations Committee

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Wednesday, January 18, 2023  
1:30–2:30 pm CT  
Regency Ballroom



### Doug Lueders, Chair

Recently retired, Doug Lueders was the manager of the Minnesota Department of Agriculture's Commercial Feed Program for 16 years. He 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 includes membership on 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, Lueders 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) 2022 Annual Meeting Minutes (approved as written on 9/9), posted on AAFCO website and in the Feed BIN, included in the General Session packet
- 3) Committee/Work Group Reports
  - a) "Labeling" work group report (Attachment A) – Scott
  - b) Model Regulation 4(d) work group report (Attachment B) – Dan
  - c) SUIP Biennial work group report (Attachment C) – Cathy
  - d) FFIM VSIP work group update – Ken
- 4) Old Business
- 5) New Business
  - a) Model Regulations for Pet Food and Specialty Pet Food (placeholder) – Lizette/Stan
  - b) Pet Food/Cottage Food Exemption
- 6) Assignments/Homework for Annual Meeting
- 7) Adjourn

### Attachment A

The term "labeling" means all labels and other written or graphic materials in print or electronic form that are published or disseminated by a guarantor or distributor (1) upon a commercial feed or any of its containers or wrappers, or (2) accompanying or promoting such commercial feed.

### Attachment B

- (d) Guarantees for drugs shall be stated in terms of percent by weights, except:
  - (1) ~~Antibiotics~~ Drugs, present at less than 2,000 grams per ton (total) of commercial feed, shall be stated in grams per ton of commercial feed.
  - (2) ~~Antibiotics~~ Drugs, present at 2,000 or more grams per ton (total) of commercial feed, shall be stated in grams per pound of commercial feed.
  - (3) ~~Labels for commercial feeds containing growth promotion and/or feed efficiency levels of antibiotics, which are to be fed continuously as the sole ration, are not required to make quantitative guarantees except as specifically noted in the Federal Food Additive Regulations for certain antibiotics, wherein, quantitative guarantees are required regardless of the level or purpose of the antibiotic.~~
- (4)(new 3) The term "milligrams per pound" may be used for drugs or antibiotics in those cases where a dosage is given in "milligrams" in the feeding directions.

## Attachment C

### SUIP Workgroup Report—SUIP Review for Discussion at January 2023 AAFCO Midyear Meeting

1. **SUIP #1. Nitrogen Free Extract and Carbohydrate Guarantees** – “are no longer considered as necessary and meaningful”... This SUIP has been written as such since 1963.
  - a. The AAFCO Pet Food Committee (PFC) is updating the Pet Nutrition Facts box to modernize presentation of carbohydrate information hence this SUIP seems unnecessary.
    - i. Ask PFC if they accept removal of this SUIP?
    - ii. Ask Feed Labeling Committee (FLC) if they accept removal of this SUIP?
  - b. **If both PFC and FLC are aligned, then the WG recommends deletion of SUIP #1**
2. **SUIP #2. Trade or Proprietary Names** – “shall not be used in formulating definitions, etc.”
  - a. Language included already in ‘Guide to Submitting New or Modified Ingredient Definitions to AAFCO’ on page 337, (2), A, V: ingredient definition proposed name shall... “not include a trade name or be proprietary in nature.”
  - b. Propose to IDC that the Guide be edited on p. 337 as follows: If there is no B, it’s odd to have an A. Suggest moving “The proposed name shall:” to the end of line (2), then list each item as A, B, C, D and E.
  - c. **The WG recommends deletion of SUIP #2.**
3. **SUIP #3. Improve Stability.** Language is already included in the Official Feed Term for “Stabilized (process)” as described on page 353 of the 2022 OP. **Therefore, the WG recommends deletion of SUIP #3.**
4. **SUIP #4. Ash and nutrient elements are not analytically equivalent.**
  - a. “Ash” occurs in the OP in multiple places:
    - i. Page 148, PF4 (a) (2),(3)
    - ii. Page 154, PF9 (3)A
    - iii. Page 183, 184, 185, tables
    - iv. Page 211, 212, 214, 216, 218, Affidavits
    - v. Page 231, Regulation 5, (B) (2)
    - vi. Page 241, SUIP
    - vii. Page 304, AOAC Check Data Table
    - viii. Page 354, “Air ashed” – defined
    - ix. Page 366, Whey solids, definition includes “ash”
    - x. Page 371, 9.20, 9.21, 9.22 definitions include “ash”
    - xi. Page 375, 9.72, 9.74 definitions include “ash”
    - xii. Page 376, 9.78 definition includes “ash”
    - xiii. Page 387, 24.7, 24.8 definitions include “ash”
    - xiv. Page 403, 33.7, 33.8 definitions include “ash”
    - xv. Page 406, 33.25, 33.26, 33.27 definitions include “ash”
    - xvi. Page 419, 54.1 definition includes “ash”
    - xvii. Page 420, 54.2, 54.9, 54.10, 54.13 definitions include “ash”
    - xviii. Page 421, 54.14, 54.22, 54.23 definitions include “ash”
    - xix. Page 422, 54.25 definition includes “ash”
    - xx. Page 423, 57.1 definition includes “ash”
    - xxi. Page 440, 60.7, 60.72, 60.43 definitions include “ash”
    - xxii. Page 443, 60.84, 60.101 definitions include “ash”
    - xxiii. Page 444, 60.111 definition includes “ash”
    - xxiv. Page 447, 63.83 definition includes “ash”
    - xxv. Page 468, 73.305, 73.310 definitions include “ash”
    - xxvi. Page 471, 74.1, 74.2, 74.3, 74.4, 74.5 definitions include “ash”
    - xxvii. Page 473, all screenings must... “ash”...
    - xxviii. Page 474, 81.1, 81.2, 81.3 definitions include “ash”
    - xxix. Page 486, 87.35 “sulfated ash”
    - xxx. Page 500, 87.118 definition includes “ash”
    - xxxi. Page 503, 87.126 “acid insoluble ash”
    - xxxii. Page 525, 93.9 definition includes “ash”
  - b. Laboratory Methods group provided input regarding various forms of “ash”, see **Appendix A**.

- c. **The WG recommends the IDC consider developing official feed terms for “ash”, “acid insoluble ash”, “air ashed” and “sulfated ash”.**
  - d. **After an official feed term for ash is accepted in the OP, the WG recommends subsequent deletion of SUIP #4.**
5. **SUIP #5: Registration and Labeling of Silage Additive Products** is covered on page 113 of the 2022 OP under the definition of “commercial feed” in Section 3(b) of the Model Bill. **Therefore, the WG recommends deletion of SUIP #5.**
- Additionally, the WG recommends the following editorial revision of Section 3(b) of the Model Bill to make it more clear (tracked changes shown below).**

When used in this Act:

...

- (b) The term “commercial feed” means all materials or combination of materials which are distributed or intended for distribution for use as feed or for mixing in feed, unless such materials are specifically exempted:
  - i. Unmixed whole seeds and physically altered entire unmixed seeds, when such whole or physically altered seeds are not chemically changed or are not adulterated within the meaning of Section 7(a) of this Act, are exempt.
  - ii. The \_\_\_\_\_ by rule may be exempt from this definition, or from specific provisions of this Act, commodities such as hay, straw, stover, silage, cobs, husks, hulls, and individual chemical compounds or substances when such commodities, compounds or substances are not inter-mixed with other materials, and are not adulterated within the meaning of Section 7(a) of this Act.

***[The following editorial deletion seems justifiable as per SUIP #7 and not this SUIP. Isn't the key point that while silage may be exempt from registration, “additives” to silage are considered commercial feed like any other additive, and hence must be registered. Then, on this basis, this SUIP is not needed and should be deleted...]***

When used in this Act:

...

- ~~(b) The term “commercial feed” means all materials or combination of materials which are distributed or intended for distribution for use as feed or for mixing in feed, unless such materials are specifically exempted:~~
  - ~~i. Unmixed whole seeds and physically altered entire unmixed seeds, when such whole or physically altered seeds are not chemically changed or are not adulterated within the meaning of Section 7(a) of this Act, are exempt.~~
  - ~~ii. The \_\_\_\_\_ by rule may exempt from this definition, or from specific provisions of this Act, commodities such as hay, straw, stover, silage, cobs, husks, hulls, and individual chemical compounds or substances when such commodities, compounds or substances are not inter-mixed with other materials, and are not adulterated within the meaning of Section 7 (a) of this Act.~~

~~The WG recommends deletion of SUIP #5 if revision to Model Bill occurs.~~

***[Again, I'm not seeing why this re-statement of these Model Bill paragraphs is needed.]***

- 6. **SUIP #6: Spent Bleaching Clay (SBC)**
  - a. **Appendix B** provided by Katie Vassalli of the National Oilseed Processors Association (NOPA) and Chris Vervaeke of the Canadian Oilseed Processors Association (COPA) explains the detailed history behind this SUIP.
  - b. The WG recommends sending this historical information to IDC for evaluation of SBC as a possible official feed term or for inclusion under an existing oilseed definition or as a new feed definition.
  - c. **The WG recommends deletion of SUIP #6 because it carries no official stature as an SUIP and should be moved to another OP area.**
- 7. **SUIP #7: Chews, Bones, and Toys for Pets and Specialty Pets**
  - a. **The WG recommends that this SUIP be incorporated into Section 3(b) of the Model Bill, as follows:**

When used in this Act:

...

- (b) The term “commercial feed” means all materials or combination of materials which are distributed or intended for distribution for use as feed or for mixing in feed, unless such materials are specifically exempted:
  - i. Unmixed whole seeds and physically altered entire unmixed seeds, when such whole or physically altered seeds are not chemically changed or are not adulterated within the meaning of Section 7(a) of this Act, are exempt.
  - ii. The \_\_\_\_\_ by rule may be exempt from this definition, or from specific provisions of this Act, commodities such as hay, straw, stover, silage, cobs, husks, hulls, and individual chemical compounds or substances when such commodities, compounds or substances are not intermixed with other materials, and are not adulterated within the meaning of Section 7 (a) of this Act.
  - iii. All chews, bones, toys and exercisers made of animal skin, hide, wood, or man-made (**synthetic**) material for Pets and Specialty Pets, whether flavor-coated or unflavored, – Hooves, Ears, Animal Bones, Ligaments, Snouts, Pizzles – unless the manufacturer, in its product labeling or advertising, makes any claim that the product is intended for use as an animal food, or that the product provides anything of nutritional value to the animal (i.e., “digestible” or “high-protein”).
- b. **The WG recommends IDC consider feed term for “rawhide” –(Part) generally refers to dermal tissue of beef. The basis for this recommendation is that we removed this sentence at the bottom of SUIP #7: “Rawhide generally refers only to beef, and many of these chews use other types of animal skins or hides”.**
- c. **The WG recommends deletion of Labeling Note regarding CFR – as this is understood.**
- d. **The WG proposes the addition of word “synthetic” after man-made for clarification in part iii.**
- 8. **SUIP #8: Live Plants and Animals Distributed as Food for Pets and Specialty Pets Policy Statement**
  - a. **Appendices C and D** provide the historical timeline and feedback from Dave Dzanis, one of the members of the original working group, regarding importance of maintaining this item.
  - b. **The WG recommends discussion of this SUIP.**
    - i. Perhaps include in Section 3(b) of Model Bill?
    - ii. Consider whether these should be Common food items?
  - c. The WG would like to reconsider what to recommend after this discussion.
- 9. **SUIP #9: Dried Insects for Wild Bird Food**
  - a. The WG recommends discussion of this SUIP, similar to SUIP #8.
  - b. If this SUIP will be maintained, then the WG recommends replacing the Example of BSFL with Dried Mealworms because BSFL is now defined in 60.117, as shown below.  
**SUIP# 9: Dried Insects for Wild Bird Food** – Insects, all life stages, that are commonly found in the wild as North American wild bird food sources may be reared and dried for use in commercial wild bird feed. These insects are considered common food. The dried insects must be feed grade. The label must include the appropriate common name of the insect. Example: Dried Mealworms.

## **Appendix A: Input from Lab Methods Committee Regarding Ash**

Hi Cathy,

Here is some information for you from a chemistry colleagues' perspective:

As far as SUIP 4 on p. 241, I would completely agree with that statement. Several important nutrient elements will burn off during the Ashing process, with Nitrogen and Sulfur immediately coming to mind, but I'm sure there are a few others as well, plus some others that can have a low recovery/bias if the temperature is too hot or the time too long. As you may know, dry ashing used to be a common sample digestion technique but some nutrient elements were not obtainable this way. I did a very quick web search on this and this is one quick link < [https://link.springer.com/chapter/10.1007/978-3-319-45776-5\\_16](https://link.springer.com/chapter/10.1007/978-3-319-45776-5_16) > that includes the statement: Volatile elements at risk of being lost include As, B, Cd, Cr, Cu, Fe, Pb, Hg, Ni, P, V, and Zn. Elaine Hasty < Elaine.Hasty@cem.com > might have some expertise in this area if you want to reach out to her.

Unfortunately, I am not very familiar with the use of the term Air ashed on p. 345. Typically, ashing is done in a very limited oxygen and/or air environment to minimize combustion and loss of some of the mineral content that could occur with higher levels of O<sub>2</sub>. This might be used to indicate the “atmosphere” of the gas(es) used during the ashing process, and “air” is most commonly used in my experience, but again limiting the presence of air or oxygen is generally intended. In fact, it is usually recommended that the door of the muffle furnace is not open until the temperature drops to around 200C to prevent superheating or combusting which I have seen as bright red glowing embers in the ash if exposed to air while the crucibles are still at high temperature.

On p. 475, under Glucose Syrup, there is mention of Sulfated ash and I found one of several web references here: <https://pharmabeej.com/how-to-perform-sulfated-ash/> Again, I am not familiar with this term, but this particular method seems to be used to semi-quantitatively determine the ashed or inorganic content of some materials? Some advantages of this technique is it doesn't seem to require much equipment, it can be mostly done in an open environment, the combination of heat and acid likely destroys all the organic components. With the use of acid, this seems like a bit of a hybrid between dry ashing and wet digestion, but maybe that is why it has this special category?

Finally, on p. 492, there is mention of acid insoluble ash, which may be an important consideration. With plant based materials, often most of the ashed compounds are quite soluble in a dilute acid and some methods don't even call for the acid-solubilized ash to be heated to bring the soluble nutrients into solution. That said, acid insoluble ash could represent some highly indigestible or potentially harmful materials, so I could see where this added test could have some value.

Again, I am somewhat unfamiliar with the original intent, or use, of these terms. For example, maybe air ashed just meant burning in a crucible in an open lab environment to qualitatively differentiate between the organic components that burn off at low temperature and the inorganic components that stay behind, of which many are minerals.

I hope you find this helpful,  
Kristi  
Kristi McCallum  
Laboratory Manager  
Division of Laboratory Services - Biochemistry Laboratory

P 303.869.9257  
300 S. Technology Court, Broomfield, CO 80021  
[kristina.mccallum@state.co.us](mailto:kristina.mccallum@state.co.us) | <https://ag.colorado.gov/labs>

## **Appendix B: NOPA Response to AAFCO Inquiry Regarding Potential Revisions to the SUIP for Spent Bleaching Clay (SBC) November 2022**

Background on NOPA's Efforts on the Addition of SBC to Meal

- On July 9, 1993, a representative of a company which marketed bleaching clays for use in the food industry, L.A. Salomon Inc., sent a letter to the Association of American Feed Control Officials (AAFCO) asking about the acceptability of adding spent bleaching clay to oilseed meals used in animal feeds, as an alternative to disposal of spent clay in landfills.
- AAFCO's Environmental Issues Committee: "The committee is concerned about feed becoming a 'land-fill' for unwanted but disposable products but sees no reason why some products couldn't be safely disposed through feedstuffs."
- In May 1994, an AAFCO representative sent the letter to FDA for review.
- In September 1994, FDA responded that "To determine the safety of adding spent clay to animal feed, information on the chemical composition of the spent bleaching clay is required. Since the clay adsorbs heavy metals, the heavy metal content of the clay would be of primary concern."
- In late 1994, AAFCO approached NOPA for information on the presence of certain heavy metals in spent clay (arsenic, cadmium, chromium, lead, mercury, nickel and zinc). On April 17, 1995, NOPA responded to AAFCO with "the results of recently completed analyses of fresh and spent bleaching clays for heavy metals."

- On June 19, 1995, AAFCO submitted the results to FDA, suggesting “the possibility of adding back to the oilmeal stream a maximum of 0.2% (4 lbs of spent bleach clay/ton of oilmeal) at an integrated crushing/oil processing plant to dispose of the material in the oilmeal stream instead of the local landfill. At this level of add back, the ash and oil content of the spent clay does not change the nutritional or physical characteristics of the oilmeal.” and “... the addition of up to 0.2% of ‘spent bleaching clay’ would not be detrimental to the oilmeal users in the feed industry.”
- On October 12, 1995, FDA found that “spent clay material can be safely added back to the oilseed meal at a maximum rate of 0.2% as requested.” (*“The 0.2% level was set so that the amount would be minor and not result in changes that would affect the value (economic adulteration) of the meal.”*)
- In 1996, AAFCO formally adopted the inclusion of “spent bleaching clay” in the “Statements of Uniform Interpretation and Policy” section of the AAFCO “Official Publication” (OP):  
**“Spent Bleaching Clay is bleaching clay which is derived from acid treated montmorillonite and used to clarify refined vegetable oil (corn, soy, cottonseed, peanut and canola oil) may be added to the oilseed meal, from which the oil is derived, at a maximum rate of 0.2%. The spent clay may contain color bodies, phospholipids and soaps.” (NOTE: THIS PROVISION DOES NOT REQUIRE THAT RESIDUAL OIL BE LEFT IN THE MEAL.)**

### **Spent Bleaching Clay, USA - FDA FOOD ADDITIVE PETITION (FAP)**

In 2017, COPA began a petition with the FDA seeking to establish a 0.8% inclusion on an as is basis for spent bleaching clay (SBC) to be added to canola meal sold in the US. The current threshold for SBC added to protein meal in the US is 0.2%, as defined in the Association of American Feed Control Officials (AAFCO) publication under Statement of Uniform Interpretation and Policy (SUIP), #25.

The petition advanced through the process and was in the final phases of the review. The FDA provided proposed language on what the final rule for addition of SBC at 0.8% would look like. Had the petition been approved, canola meal containing SBC, as well as any finished feed including canola meal with SBC would require a label. Canola meal containing SBC would be intended for use in non-medicated feed but may be used in medicated feed where it has been demonstrated to not interfere with the bioavailability of particular drugs to animals.

Subsequently, the petition was withdrawn given the need for more analysis on SBC’s possible interaction with other feed medications. Industry also felt it was important to better understand the impacts a final FDA rule might have on the existing SUIP before moving forward.

### **Considerations for Modifying Existing SUIP**

Based on preliminary assessment of the working group’s activities, COPA and NOPA would be in favor of maintaining the SUIP as is. However, should it need to be removed from the SUIP, then we would ask that the terminology, as currently included, be incorporated into the existing definitions for soybean meal and canola meal, as is, and without changes to existing labeling requirements – which would maintain consistency with current U.S. industry practices. To that end, both COPA and NOPA would be happy to support AAFCO’s efforts to revise the existing definitions should the SUIP Working Group elect to go that route.

### **Industry Contacts**

Katie Vassalli (AAFCO IDC Industry Advisory)  
 Vice President of Regulatory Affairs, National Oilseed Processors Association  
 Email: kvassalli@nopa.org | Phone: 202-406-0961 (mobile)

Chris Vervaeet  
 Executive Director, Canola Oilseed Processors Association  
 Email: chris.vervaeet@copacanada.com | Phone: 204-956-9500 (office)

Brittany Wood  
 Director, Canola Utilization  
 Canola Council of Canada  
 Email: Woodb@canolacouncil.org | Phone: 204-982-7763 (office)

### **Appendix C: Live Plant Discussion (Historical)**

Historically:



IDC Minutes 2012 Midyear Reno, NV – workgroup commissioned

4 01 18 3/12/2012

6.1 (new assignment from board) form workgroup on whole live animals excluded from definitions policy statement. – Aaron **“Need for policy for “live creatures” in the ingredients before FDA.** IDC will develop a draft policy statement and send the policy statement to MBRC who will review then send to the BOD.”

Notes: Does it include phytoplankton? Not higher order mammals. What about modified animals (nutrition added) for certain reptiles and birds of prey, figured out a way to put added nutrients (like increased calcium) for egg layers in reptile area.

Direction from the BOD – we need a policy for live creatures.

What does FDA do with live animals?

Workgroup: Aaron Elam (lead), Roger Hostenbach, Dave Dzanis, Shannon Jordre

Annual Meeting 2012, Indianapolis:

E) Move to Model Bill Committee with recommendation to adopt and place in uniform policy section: MSP

Live Plants and Animals Distributed as Food for Pets and Specialty Pets Policy Statement

Live plants and animals typically distributed as food for pets and specialty pets, such as but not necessarily limited to rodents, insects, fish, and grasses, shall be exempt from registration and labeling as commercial feed products, unless the manufacturer or distributor, in its product labeling or advertising, makes any claim that the product contains added nutrients or otherwise implies increased nutritional value.

This exemption does not apply to direct-fed microorganisms and other products or ingredients defined in the AAFCO Official Publication, or plants and animals that are not live at the time of purchase.

From MBRC Minutes 2013 Midyear Albuquerque, NM

- **Ingredient Definition Committee Recommendation for a Statement for Uniform Interpretation and Policy for Live Plants and Animals Distributed as Food for Pets and Specialty Pets:** The committee reviewed the statement for uniform interpretation and policy developed and approved by the Ingredient Definitions Committee for live plants and animals distributed as food for pets and specialty pets (attachment A).

As approved by the Ingredient Definition Committee, the proposed policy would be limited in application to only pets and specialty pets. During review by the committee, there was considerable discussion as to whether the scope of the policy should be expanded to include all animals.

After considering the potential ramifications of how such a change could affect certain products distributed to food-producing animals, it was moved by Mr. Burkholder and seconded by Mr. TenEyck to approve the statement without change as recommended by the Ingredient Definitions Committee and forward it to the Board of Directors with the recommendation that it be presented to the membership for inclusion in the Official Publication. Committee members unanimously approved the motion.

From General Business meeting 2013 Annual St. Pete Beach, FL

**Model Bill and Regulations Committee Recommendation.**

Doug Lueders states the AAFCO Board of Directors accepted the recommendation from the MBRC to add a statement for Uniform Interpretation and Policy for Live Plants and Animals Distributed as Food for pets and Specialty Pets into the Official Publication as found on page 40. I so move. Sam Davis Seconds. **MOTION CARRIES.**

**Appendix D: Live Plant SUIP#8 – Input from Dave Dzanis**

2022 perspectives:

Thanks for asking about this, Angele. Please see my perspective below in bold.

Is the SUIP still needed? **Yes.**

As an SUIP? **Yes. I would consider this to be equivalent in intent to SUIP #7 re: rawhides, bones, etc. As I recall, after previous efforts by a WG to eliminate most if not all SUIPs, both #7 and #8 were retained because workable placement elsewhere could not be determined. What if any new plans are there to move SUIP #7 out of the SUIPs?**

Has it been worked into regulations elsewhere? **No. I believe this approach was considered, but dropped when it was determined that while you could exempt specified labeling requirements in some instances, you could not exempt a product from registration within the regulations *per se*.**

Are there any consequences of it being removed? **Yes, items such as live crickets, mice and cat grass (which comes as seeds or sprouts in a container that the purchaser has to water) would have to bear guarantees, etc., which isn't terribly feasible in most circumstances. Also, registration would be burdensome for both states and industry, same as for rawhides, etc.**

Would it be appropriate to move live plants and animals to the commercial feed exemption in Model Bill Section 3(b)? **That doesn't provide for the exception to the exemption, i.e., that labeling and registration of these items IS required when a nutrient content claim is made (e.g., calcium claim for waxworms or gut-loaded crickets). Perhaps more importantly, that would require states to open their laws to amend, which as you know many would be reluctant to do.**

Or would these be considered to be 'common food' and sent to the IDC's Common Food Subcommittee? **Actually, that would help address the fact that these items typically aren't AAFCO-defined, either. However, status as a common food alone would not automatically exempt them from labeling and registration requirements.**

Hope that helps. Glad to further advise the WG if needed.

Dave

David A Dzanis DVM PhD DACVIM (Nutrition)  
Board Certified Veterinary Nutritionist®  
Regulatory Discretion, Inc

**Appendix E: Pending input from WBFI**

**Notes**

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**Speaker Dr. Jesse Traller,  
Senior Phycologist, Global Algae Innovations**

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Thursday, January 19, 2023  
9:00–9:30 am CT  
Regency Ballroom



Jesse Traller is a senior phycologist at Global Algae Innovations, an algae production company with operations in California and on the island of Kauai, Hawaii. With a background in molecular biology and algal metabolism, Traller provides technical expertise in Global Algae research and development projects and manages the contracts and grants for federal awards. She has a BS in molecular biology, an MS in oceanography, and a PhD in marine biology from the UC San Diego Scripps Institution of Oceanography. Traller is an active member of the Algae Biomass Organization, serving as a committee member of the Algae for Food and Feed Initiative. She also serves on the board for the Algae Foundation, a nonprofit 501(c)3 focused on algae-related STEM education and public outreach.

## Feed Labeling Committee

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Thursday, January 19, 2023  
10:00–11:00 am CT  
Regency Ballroom



### David Dressler, Chair

David Dressler has worked with the Pennsylvania Department of Agriculture for 14 years, being involved in the animal feed program for 12 of those years. Prior to starting his career with the Pennsylvania Department of Agriculture, Dressler received a bachelor's degree in agricultural science from Penn State University. In May 2014, Dressler attended his first AAFCO meeting, the Feed Administrator's Seminar in Big Sky, Montana, and became the voting Control Official for Pennsylvania in January 2015. Dressler assumed his first leadership role in AAFCO by becoming the chair of

the Feed Labeling Committee in August 2016.

### Agenda

#### Introductions (5 mins)

- Roll Call of Members & Advisors

#### OP Edits Workgroup Recommendations (20 mins)

- Edits to Required Guarantees for Poultry
- Feed Labeling Guide
- Next Steps?

#### Unique Identifiers (i.e. Lot Numbers) on Feed Labels (20 mins)

- Work Group Update
- Next Steps?

#### Labeling of Products Containing Microorganisms (15 mins)

- Workgroup Update
- Next Steps?

### Adjourn

### OP Edits Workgroup Recommendations

**Recommendation #1:** Modify Regulation 3(a)(4)(II) within the model regulations to the following:

- II. Required guarantees for Formula Poultry Feeds (Layers, Broilers, and Turkeys; including breeders)
  - a. Animal Classes
    - (1) Layers - Chickens that are grown to produce eggs for food, e.g., table eggs
      - (a) Starter/Grower (Laying hen replacements) - Female chickens raised from day of hatch to sexual maturity (time first egg is produced) and intended to become laying hens.
      - (b) Laying hens - From time first egg is laid throughout the time of egg production.
    - (2) Broilers - Chickens that are grown for human food.
      - (a) Starter/grower - From day of hatch to approximately 5 weeks of age.
      - (b) Finisher - From approximately 5 weeks of age to desired market weight.
    - (3) Breeding Chickens
      - (a) Breeder replacement chickens - Chickens, of both sexes, raised from day of hatch to sexual maturity and intended to become broiler breeder or layer breeder chickens.
      - (b) Breeder chickens
        - (i) Broiler breeder chickens - Sexually mature male and female chickens intended to produce fertilized eggs for hatching into broilers or broiler breeder replacement chickens.

**(ii) Layer breeder chickens - Sexually mature male and female chickens intended to produce fertilized eggs for hatching into laying hen replacement chickens or layer breeder replacement chickens.**

(4) Turkeys

(a) Growing **Turkeys** - Turkeys that are grown for human food.

**(i) Starter/Grower - From** day of hatch to approximately 13 weeks of age (females) and 16 weeks of age (males).

**(ii) Finisher - From** approximately 13 weeks of age **(females) or** 16 weeks of age **(males) to** desired market weight.

**(b) Breeder replacement turkeys** - Turkeys **of both sexes** that are grown from day of hatch to **sexual maturity and intended to become breeder turkeys.**

**(c) Breeder Turkeys - Sexually mature male and female turkeys intended to produce fertilized eggs for hatching into growing turkeys or breeder replacement turkeys.**

b. Guaranteed Analysis for Poultry Complete feeds and Supplements (all animal classes)

- (1) Minimum percentage of Crude Protein
- (2) Minimum percentage of Lysine
- (3) Minimum percentage of Methionine
- (4) Minimum percentage of Crude Fat
- (5) Maximum percentage of Crude Fiber
- (6) Minimum and maximum percentage of Calcium
- (7) Minimum percentage of Phosphorus
- (8) Minimum and maximum percentage of Salt (if added)
- (9) Minimum and maximum percentage of total Sodium shall be guaranteed only when total sodium exceeds that furnished by the maximum salt guarantee

**Recommendation #2:** Within the Feed Labeling Guide (Pages 244 – 256 of the 2022 OP), insert the following:

Equine Mineral Supplement Feeds YOUR PASTURE HORSE MINERAL  
For maintenance of mature horses

<u>Guaranteed Analysis</u>	
Calcium (min)	12.0%
Calcium (max)	14.0%
Phosphorus (min)	12.0%
Salt (min)	4.5%
Salt (max)	5.5%
Sodium (min)	4.5%
Sodium (max)	5.5%
Copper (min)	860 ppm
Selenium (min)	0.20 ppm
Zinc (min)	3400 ppm
Vitamin A (min)	80000 IU/lb.

Ingredient Statement

Calcium Carbonate, Dicalcium Phosphate, Salt, Copper Sulfate, Manganous Oxide, Molasses Products, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Calcium Iodate, Vitamin A Supplement, Processed Grain By-Products, Choline Chloride, Animal Fat, Ethoxyquin (a preservative), Sodium Selenite.

Feeding Directions:

Feed free-choice at an approximate rate of 2 oz/head/day. Provide fresh, clean water and white salt free-choice.

Manufactured By: YOUR NAME FEEDS

City, State Zip

NET Wt.: 50 lb. (22.67 kg)

Goat Complete and Supplement Feeds YOUR GOAT FEED  
For breeding does

Guaranteed Analysis

Crude Protein (min)	15.0%
(This includes not more than 1.0% equivalent crude protein from non-protein nitrogen)	
Crude Fat (min)	2.0%
Crude Fiber (max)	20.0%
Acid Detergent Fiber (max)	25.6%
Calcium (min)	0.8%
Calcium (max)	1.3%
Phosphorus (min)	0.35%
Salt (min)	0.35%
Salt (max)	0.85%
Copper (min)	20 ppm
Copper (max)	10 ppm
Selenium (min)	0.30 ppm
Vitamin A (min)	7000 IU/lb.

Ingredient Statement

Grain Products, Plant Protein Products, Processed Grain By-Products, Roughage Products, Ammonium Chloride, Vitamin A Supplement, Cholecalciferol (source of Vitamin D3), Choline Chloride, Biotin, Thiamine Mononitrate, Pyridoxine Hydrochloride, Vitamin E Supplement, Copper Sulfate, Folic Acid, Ethoxyquin (a preservative), Calcium Carbonate, Dicalcium Phosphate, Monocalcium Phosphate, Manganous Oxide, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Potassium Chloride, Sodium Selenite.

Feeding Directions:

Feed as the sole source of grain to breeding goats at the rate of 2 to 3 pounds per head per day.

Important: Feed hay along with this ration, as per directions.

Manufactured By: YOUR NAME FEEDS

City, State Zip

NET Wt.: 50 lb. (22.67 kg)

**Unique Identifiers on Feed Labels**

**Recommendation #1:**

**Add lot identifiers definition to model bill Section 3. Definitions of Words and Terms**

"Lot identifier" means a unique identifier, such as a run number, code, date, or other suitable identification for each batch or production run that enables the manufacturer to accurately trace the manufacturing and distribution history of a product. To facilitate tracing of packaged products, lot identifiers can be applied to the label, container, or package. For bulk products, lot identifiers can be applied to the label, invoice, or other documents accompanying the product.

**Add below language to Section 5. Labeling of Model Bill**

(a) In case of a commercial feed, exempt a customer-formula feed, it shall be accompanied by a label bearing the following information.

(8) A lot identifier.

- (b) In the Case of a customer-formula feed, it shall be accompanied by a label, invoice, delivery slip, or other shipping document, bearing the following information:
  - (8) A lot identifier.

**Add below language to Regulation 2. Label Format of Model Regulations**

- (e) A lot identifier

**Recommendation #2:**

**Move to insert Section 15. Recordkeeping Requirements in the Model Bill and move the current Sections 15-19 to follow Section 15. Recordkeeping Requirements in Sequential order**

**Section 15. Recordkeeping Requirements**

- a) Records shall be maintained and be adequate to facilitate a recall of a specific batch or production run of commercial feed product that has been distributed.
- b) Records relating the lot identifier to the manufacture and distribution of the commercial feed product must be kept for one year after the last date of distribution.

**Recommendation #3:**

**Move to insert Regulation 11. Recordkeeping Requirements in the Model Bill and move the current Regulation 11-13 to follow Regulation 11. Recordkeeping Requirements in Sequential order**

**Regulation 11. Recordkeeping Requirements for Manufacturing**

- (a) For each commercial feed distributed, complete records shall be maintained in a manner that will facilitate the recall, diversion, or destruction of the commercial feed, if necessary. Such records shall be maintained for at least one years after the date of distribution by the manufacturer and shall include the following;
  - 1. Date of manufacture.
  - 2. Lot identifier.
  - 3. Date and quantity distributed.
- (b) Records required under this section shall:
  - 1. Be kept as original records, true copies, or electronic records.
  - 2. Be accurate, indelible, and legible.
  - 3. Be created concurrently with the performance of the activity documented.
  - 4. Be as detailed as necessary to history of work performed.

**Labeling of Products Containing Microorganisms**

First, need to determine if a laboratory method is available. If no method exists, then regulators can't require something else. Once there are validated methods, then can proceed with determining what should be on the label.

Recommendation: Forward to Laboratory Services Committee to inquire about a validated method to separate microorganism guarantees.

If a validated method is available, could consider the following options:

- 1. Remove Total Microorganism Guarantee
  - Require separate guarantees for each species or group of species.
  - Note: Could be problematic with international trade.
- 2. Individual guarantees based on label claims. For example, this product contains (species name) for the purpose of (purpose of the microorganism).
  - Would be for nutritional claims.
  - Still have total microorganism guarantee with subguarantee for the claimed strain(s).
- 3. Separate groups of guarantees based on label claims. For example, this product is formulated with probiotics and prebiotics for (state purpose of the probiotics & prebiotics).
  - Have a group of probiotics guaranteed and then a separate group of prebiotics.
  - If there are additional microorganisms, still have the total microorganism guarantee separately from the grouping of probiotics and prebiotics.



[illegible]

## Strategic Affairs Committee

2023 AAFCO Midyear Meeting  
Hyatt Regency San Antonio Riverwalk  
San Antonio, Texas  
Thursday, January 19, 2023  
11:00 am–12:00 pm CT  
Regency Ballroom



### Linda Morrison, Chair

Linda Morrison has a postgraduate education in animal science from Macdonald College of McGill University. She has almost three decades of experience managing the Feed Program in Canada and was the director of the Animal Feed Division, Canadian Food Inspection Agency (CFIA) (1982–2012). Morrison also worked with the CFIA's Inspection Modernization Office to develop the Integrated Agency Inspection Model for a common approach to inspecting food and animal and plant health.

Morrison 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 1998-1999. Morrison retired from the CFIA in 2016, whereupon she became a Life Member to continue to support AAFCO.

### Agenda

1. Introductions and Agenda Review
2. Strategic Plan
  - o 2017–20: 2022 Close out
  - o 2023–2025: Implementation (Attachment B)
  - o 2023–2025 SAC assignment:  
Establish charitable giving/scholarship framework. (Objective 1.3 Task 2)  
**Responsible:** Strategic Affairs Committee (SAC) and FC  
**Deliverable:** Completion of guidelines for recommendations to the Board within one year and Board implementation within two years.
    - Aligns with organizational health, not with financial management improvement. Could be scaled. One charity per year that President recommends and Board approves. Could include educational scholarships or endowment foundation. Develop thresholds and guidelines when revenue allows.
    - Should report out at Midyear and Annual. Could include report back from recipients at member meetings.**Timeframe:** Annual Meeting 2024
    - SAC action to set up work group
3. Procedures Manual
  - o Draft Privacy Policy update (Erin, Jacob, Scott, FASS) (Attachment A)
    - Board charge: The Strategic Affairs Committee will review drafted language for the AAFCO Privacy Policy and consult with the Attorney to come up with a proposed policy and report back to the Board of Directors.
    - Draft developed with assistance from FASS and legal. Counsel provided suggestions to bring into compliance with GDPR
    - Work Group: Erin, Jacob (Technology Comm. Rep), Scott, FASS rep
    - Identify placement in Procedures Manual.
4. Other business
  - o Procedures Manual update/clarification including linkage with By-Laws and Official Publication (expanded from Secretary-Treasurer description update)
    - The WG will:
      - Focus on defining what information is maintained in each of the three. Reduce overlap and duplication. Consideration should be given to minimizing OP content

- respecting procedures that could be placed in the PM. This would help manage the size of the OP.
    - Conduct fulsome review/update; include consideration of how the PM is managed (information storage; format; maintenance)
    - Work Group: Ashlee-Rose, Kent, By-Laws SC, Linda, Stan
    - Timing: Develop plan by Annual and updates/report out by Midyear 2023
  - o Resolutions Policy Guidance update (Hollis, Stan, Erin, Ashlee-Rose)
    - Develop guidance on drafting resolutions (WG) and implementation (CIOC/Philosophy)
    - Timeline: Guidance and implementation recommendations for Annual 2022
- 5. New business
  - o Reimbursement Policy
    - Board charge: With the potential for the mileage rate to change, moving forward we reimburse for the higher of the 2 rates whenever the implementation date of a rate change occurs during an approved travel. Implement the proposed mileage reimbursement policy for when there is a rate change until such time that the new policy is published. Additional request: That it be noted that we would allow for reimbursement matching member agency rules when applicable.

### Action Item Table

Responsible	Item	Action	Timing / Status
WG: Ashlee-Rose, Kent, + By-Laws Subcommittee, Linda, Stan	Procedures Manual/By-Laws/Official Publication update	Update/clarify Procedures Manual including linkage with By-Laws and Official Publication (expanded from Secretary-Treasurer description update) then proceed with ST, ED and AMF review	Draft plan by Midyear 2023 with goal of finalization Annual 2023
WG: Erin, Jacob (Technology Comm. Rep), Scott, FASS rep	Privacy Policy	Restarting with AAFCO's legal counsel who have a template and will continue working with FASS on drafting. Have added Mocaworks/Tribe to include their comments.	Anticipate document for Midyear 2023.
WG: Stan, Erin, Hollis, Ashlee-Rose	Resolutions Policy	Review AFDO policy and consider for AAFCO; Draft policy developed for discussion Midyear 2022	Policy Complete; Draft guidance to develop and implement resolutions at Midyear 2023.

### Attachment A

#### Privacy Policy (Draft)

*Effective as of October 19, 2022*

#### INTRODUCTION

The Association of American Feed Control Officials ("AAFCO," "we," "our," or "us") respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the information you provide to us in using our website ("Site") and the services provided through our Site (the "Services").

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. Please review this Privacy Policy periodically.

This Privacy Policy covers the following topics:

1. COLLECTING AND USING INFORMATION
2. COOKIES AND OTHER TRACKING TECHNOLOGIES
3. THIRD PARTY PROCESSORS
4. "DO NOT TRACK" SIGNALS
5. CHOICES ABOUT YOUR PERSONALLY IDENTIFIABLE INFORMATION

6. SECURITY
7. THIRD PARTY LINKS
8. CHILDREN'S PRIVACY
9. NOTICE TO NEVADA RESIDENTS
10. NOTICE TO CALIFORNIA RESIDENTS
11. HOW TO CONTACT US

## 1. COLLECTING AND USING INFORMATION

### Personally Identifiable Information We Collect Online

We collect Personally Identifiable Information from you through your use of the Site and Services. "Personally Identifiable Information" is individually identifiable information about an individual consumer that we collect online and that we maintain in an accessible form. We collect the following types of Personally Identifiable Information:

#### Information You Provide

We may collect the following Personally Identifiable Information that you voluntarily provide to us:

- *Create an Account.* To create an account, you will provide us with your name, job title, company name, physical address, phone number, email address, and you will create a username and password for future logins.
- *Purchase.* To make a purchase you will provide your name, physical address, phone number, email address, and credit card information. We use FASS Inc. to process payments. Please review FASS's privacy policy [here](#).
- *Register for a Meeting or Event.* To register for a meeting or event, you will provide us with your name, physical address, and email address.
- *Contact Us.* To contact us or ask us a question, you will provide us with your name, email address, company name and title, and any other information you may choose to provide in your question.

#### Information as You Navigate Our Site

We automatically collect certain Personally Identifiable Information through your use of the Site and Services, such as the following:

- *Usage Information.* For example, your IP address, pages on the Site you access, the frequency of access, and what you click on while on the Site.
- *Device Information.* For example, hardware model, operating system, application version number, and browser.
- *Mobile Device Information.* Aggregated information about whether the Site is accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information.* Location information from Site visitors on a city-regional basis.

#### Third Party Information

In some cases, we may receive certain Personally Identifiable Information from you about a third party. For example, to register for an event or meeting, you may provide the name, physical address, and email address of a third party. If you submit any Personally Identifiable Information about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personally Identifiable Information in accordance with this Privacy Policy.

### How We Use Your Personally Identifiable Information

We use the Personally Identifiable Information we collect to provide the Services to you, to improve our Services and Site, and to protect our legal rights. In addition, we may use the Personally Identifiable Information we collect to:

- Process your account registration;
- Process and fulfill your order;
- Register you for a meeting or event;
- Contact you regarding our products, services, and events that we feel may be of interest to you;
- Communicate with you about our Site or Services or to inform you of any changes to our Site or Services;
- Provide support;

- Maintain and improve our Site and Services;
- Defend our legal rights and the rights of others;
- Efficiently maintain our business; and
- Comply with applicable law.

#### **How We Share Your Personally Identifiable Information**

We may share the information that we collect about you in the following ways:

- With our association management organization;
- With service providers who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, membership management, etc.);
- To service providers to prepare, deploy and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personally Identifiable Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personally Identifiable Information;
- To any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition or in preparation for any of these events; and
- To any other person or entity where you consent to the disclosure.

## **2. COOKIES AND OTHER TRACKING TECHNOLOGIES**

#### **How We Use Cookies**

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons) (collectively, “Cookies”). “Cookies” are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to:

- Estimate audience size and usage patterns;
- Understand and save your preferences for future visits, allowing us to customize the Site and Services to your individual needs;
- Keep track of search engine results;
- Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and
- Recognize when you return to the Site.

We set some Cookies ourselves and others are set by other entities. We use Cookies set by other entities to provide us with useful information to help us improve our Site and Services, to conduct advertising, and to analyze the effectiveness of advertising. For example, we use Cookies from Google, Microsoft and other similar companies.

#### **How You Can Opt-Out of Cookies**

When you first visit our Site, you will be presented with a banner which offers you choices about whether to accept or reject cookies or tracking technologies of different types. If you wish to change your preferences, you can do so by clicking here.

#### ***Browser Settings***

Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Site.

You can find out more about Cookies and how to manage them by visiting [www.AboutCookies.org](http://www.AboutCookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### ***Platform Controls***

You can opt out of Cookies set by specific entities by following the instructions found at these links:

- Google: <https://adssettings.google.com>
- Microsoft: <https://account.microsoft.com/privacy/ad-settings/>

### *Advertising Industry Resources*

You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the [Network Advertising Initiative's website](#) or the [Digital Advertising Alliance's website](#). For more information on mobile specific opt-out choices, visit the [Network Advertising Initiative's Mobile Choices website](#). Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

### **Google Analytics**

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Site and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click [here](#).

### **Google reCAPTCHA**

We use Google reCAPTCHA, a free service provided by Google, Inc., to protect our Site from spam and abuse. Google reCAPTCHA uses advanced risk analysis techniques to decipher humans and bots. Google reCAPTCHA works differently depending on what version is deployed. For example, you may be asked to check a box indicating that you are not a robot or Google reCAPTCHA may detect abusive traffic without user interaction. Google reCAPTCHA works by transmitting certain types of information to Google, such as the referrer URL, IP address, visitor behavior, operating system information, browser and length of the visit, cookies, and mouse movements. Your use of Google reCAPTCHA is subject to Google's [Privacy Policy](#) and [Terms of Use](#). More information as to Google reCAPTCHA and how it works is available [here](#).

## **3. THIRD PARTY PROCESSORS**

To ensure that your Personally Identifiable Information receives an adequate level of protection, we have put in place appropriate procedures with the service providers we share it with to ensure that it is treated consistent with applicable data security and privacy laws. For example, we use cloud data storage, shipping fulfillment, payment processors, and membership management providers.

## **4. "DO NOT TRACK" SIGNALS**

Some internet browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, the Site does not currently interpret, respond to or alter its practices when it receives "Do Not Track" signals.

## **5. CHOICES ABOUT YOUR PERSONALLY IDENTIFIABLE INFORMATION**

### **Review and Request Changes to Your Personally Identifiable Information**

You may use your account to access, correct, or view certain Personally Identifiable Information that is associated with your account. To review or request changes to any of your Personally Identifiable Information, please contact us at [aafco@aafco.org](mailto:aafco@aafco.org).

### **Marketing Communications**

To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails. You also may submit a request to us at [aafco@aafco.org](mailto:aafco@aafco.org).

## **6. SECURITY**

We maintain commercially reasonable security measures to protect the Personally Identifiable Information we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personally Identifiable Information, we cannot guarantee absolute security.

## **7. THIRD PARTY LINKS**

The Site and Services may contain links that will let you leave the Site [and Services] and access another website. Linked websites are not under our control. This Privacy Policy applies solely to

Personally Identifiable Information that is acquired by us on this Site and Services. We accept no responsibility or liability for these other websites.

**8. CHILDREN'S PRIVACY**

The Site and Services are not intended for children under 13 years of age. We do not knowingly collect, use, or disclose personal information from children under 13.

**9. NOTICE TO NEVADA RESIDENTS**

Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines "sale" to mean the exchange of certain types of personal information for monetary consideration to another person. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to [aafco@aafco.org](mailto:aafco@aafco.org).

**10. NOTICE TO CALIFORNIA RESIDENTS**

We do not disclose personal information obtained through our Site or Services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

**11. HOW TO CONTACT US**

To contact us for questions or concerns about our privacy policies or practices please contact us:

AAFCO  
Attn: Privacy Policy Request  
1800 S Oak St  
Champaign, IL 61820  
[aafco@aafco.org](mailto:aafco@aafco.org)  
217-356-4221

## **Attachment B**

### **Strategic Plan 2023–2025**

In early 2022, the Board of Directors (Board) and Committee Chairs as well as Food and Drug Administration (FDA) and Past President representatives met virtually to establish Goals and Objectives. Tasks were identified at Seminar (May 16) (hybrid virtual and in person) and finalized virtually in October. The Board decided to **Table Objectives 1.1 and 4.1** from Task identification at Seminar. The work will be done in future, led by a Board group.

For 6 Objectives, each group was asked to:

1. Identify and prioritize Tasks for each Objective. Identify intended outcomes for each Task and prioritize the Task list.
2. For each Task identify responsible committees, timelines and activities to achieve the Task outcome. Consider resources and financial implications.
3. Each Task needs to have a tangible outcome that will translate into what will be accomplished.
4. Tasks will be identified based on the premise that they will be completed within the Strategic Plan timeframe (3 years starting January 2023; full years 2023–2025). If not, the timeframe will be specified (e.g., 5 years).

Smart Tasks principles were used:

- *Specific* – target a specific area for improvement.
- *Measurable* – quantify or at least suggest an indicator of progress.
- *Assignable* – specify who will do it.
- *Realistic* – state what results can realistically be achieved, given available resources.
- *Time-related* – specify when the result(s) can be achieved.

### **Finalized Goals and Objectives**

**Vision** – AAFCO is a trusted leader that safeguards animal and human health.

**Mission** – AAFCO is a collaborative association that supports members and stakeholders, and promotes a safe feed supply through unified system-based regulation, feed ingredient standards and laboratory operations.

### **GOAL 1: Improve Organizational Infrastructure and Operations**

(Improve the organization's infrastructure and operations to be more effective and efficient and dynamic.)

- Objective 1.1: Evaluate current AAFCO internal protocols and processes to enhance operational efficiencies (tabled to address in future)
- Objective 1.2: Identify and develop organizational training for AAFCO leaders
- Objective 1.3: Identify and pursue opportunities that improve financial management and advance organizational health

## **GOAL 2: Enhance Member Support and Education Resources**

(Members are supported through the development of tools, resources, education, and other efforts.)

- Objective 2.1: Be the leading resource of training for animal food regulators and laboratories within 5 years
- Objective 2.2: Enhance membership through recruitment, support and sustainability

## **GOAL 3: Advance Human and Animal Health and Safety**

(Regulatory and laboratory initiatives promote the health and safety of humans and animals.)

- Objective 3.1: Promote and integrate Animal Food Safety Systems
- Objective 3.2: Promote and integrate laboratory technology, methods, quality systems, and collaboration in support of Animal Food Safety Systems

## **GOAL 4: Foster External Stakeholder Relationships**

(Relationships with external stakeholders are fostered to provide advancement opportunities for the Association.)

- Objective 4.1: Identify stakeholders with common interests in order to prioritize, develop, and maintain professional relationships that advance AAFCO's Vision and Mission (tabled to address in future)

Participants at Seminar were divided into 6 groups (5 in person, 1 virtual). Each group worked on two Objectives to establish Tasks. Follow-up virtual calls were held in October to work on finalizing the Tasks for each Objective.

<b>1.2</b>	<b>1.3</b>	<b>2.1</b>	<b>2.2</b>	<b>3.1</b>	<b>3.2</b>
Organizational Training AAFCO Leaders	Financial Management and Organizational Health	Regulatory and Lab Training	Enhance Membership	Integrated AFSS Roadmap	Integrated Lab AFSS Roadmap
Round 1		<i>Virtual</i>			
Scott	Ashlee-Rose	<i>Richard</i>	Kristin	Erin	Mark
Tim	Ken	<i>Eric N.</i>	Dave D.	Dave E.	Josh
Charlotte*	Mick	<i>Ali</i>	Liz	Jacob	George
	Stan	<i>Sally</i>	Hollis	Austin	
Round 2				<i>Virtual</i>	
Ashlee-Rose	Tim	George	Erin	<i>Richard</i>	Kristen
Ken	Stan	Josh	Dave E.	<i>Sharon</i>	Dave D.
Mick	Charlotte	Mark	Jacob	<i>Darrell</i>	Liz
			Austin	<i>Eric N.</i>	Hollis
				<i>Ali</i>	
Electronic version from:					
Ashlee-Rose	Stan (and Ashlee-Rose)				
	Josh	Erin	Dani	Dave D	
<b>Virtual Calls</b>					
Charlotte	Ashlee-Rose	Austin	Jenny	Kristi	George
Marissa	Laura	Kristi	Liz	Erin	Dave D.



Scott	Michelle M.*	Miriam	Jacob	Jacob	Kristen
Eric B.	Austin	Ali	Hollis	Laura	Josh
Ashlee-Rose	Ken	Josh	Dave E.	Kent	Mark
Ken	Eric B.	Mark	Kristen	Darrell	Liz
Mick	Mick	George	Marissa	Dave E.	Hollis
Michelle M.*	Stan	Eric N.	Erin	Ali	Austin
Jo Lynn	Kent	Sharon	Dave D.	Sharon	
Austin	Charlotte	Sally	Jo Lynn	Eric N.	
Doug	Darrell		Austin	Austin	
Miriam	Jenny				
	Doug				

*Italics indicate they were invited but did not attend*

\*Additional FDA participant

Strategic Planning participants unable to attend Seminar Task identification session: Kent, Eric B., Miriam, Jenny, Jo Lynn, Doug, Laura, Darrell, Kristi, Marissa

### **TASKS INTEGRATED FROM SEMINAR AND VIRTUAL CALL WORK GROUP SESSIONS**

#### **GOAL 1: Improve Organizational Infrastructure and Operations**

(Improve the organization's infrastructure and operations to be more effective and efficient and dynamic.)

#### **TABLED**

#### **Objective 1.1: Evaluate current AAFCO internal protocols and processes to enhance operational efficiencies**

Narrative: Need to define internal protocols beyond what currently appears in Procedures Manual and OP — e.g. Standard Operating Procedures (SOPs) for FASS (Executive Assistant changeover), common contracting procedures (include legal advice), document and improve financial procedures (budget process). Increase awareness of procedures to enhance use and adherence.

- o T – Reconfigure internal operations to support shifting from legacy infrastructure to the operations necessary to support the future direction of AAFCO as determined by the Board.
- o T – Review infrastructure and operations and adjust as needed to align with the projected programs each year in July.
- o T – *Suggested alternate: Comprehensively review AAFCO roles and update as needed in the Procedures Manual.* Clarify AAFCO roles and expectations and increase awareness of such.
- o T – Needs to be part of the protocols and processes evaluation tasks. Create a comprehensive operations manual
- o T – *Needs to be part of the protocols and processes evaluation tasks.* Develop additional procedures where needed to ensure efficiency and consistency. Implement steps for quality assurance and maintenance for all association functions.
- o T – *Already in progress whereby Board Liaison to Committee is responsible.* Have a “committee coordinator” to maintain contact with Committee chairs to see that committee tasks are being performed in a timely manner between meetings. We have too many committees and subcommittees that don't complete tasks between meetings.

#### **Objective 1.2 – Identify and develop organizational training for AAFCO leaders**

Narrative: Evaluate procedures, identify gaps, establish, and implement procedures for onboarding and functionality in leadership roles (Board and Committee leaders).

#### **Tasks**

1. Improve orientation and training for Committee Chairs and Board members.

**Responsible:** Education and Training Committee (ETC) (with Subject Matter Expert help from experienced AAFCO members)

#### **Deliverable:**

*Priority 1:* Develop a draft template compiling training needed and identify process to determine needs/wants (Develop a gap template).

- Identify work that has already been done and compile. Identify additional activities specific to the Board.

- Develop a checklist for duties and deadlines. Leverage the Official Publication (OP) info into a cheat sheet.
- Identify core training list for Committee Chairs, Board members, other leaders, and potential leaders. Examples include:
  - Meeting facilitation
  - Robert's Rule of Order
  - Budget 101
  - Strategic Thinking and Decision Making
  - Exchange or shadow programs between states and with FDA (CVM or OHAFO Field)

**Timeframe:** Gap template draft by Seminar 2023 and Committee vote Annual 2023.

**Priority 2:** Develop an implementation framework. Leverage what has already been developed.

- Part of task should include identification of current training and needed training including onboarding steps.
- Ensure various roles are captured, e.g. FDA member, votes differently.
- Orientation on Committee Chair expectations, roles, responsibilities, interactions, reporting to the Board and other committees.
- Identify touchpoints – identify committee deliverables and flow. Assign to all committees and Board member to map.
- Identify leadership mentors as part of framework (orientation/onboarding and ongoing).
- Include ongoing training for leadership enhancement.

**Timeframe:** Fall 2023 – Short term

**Priority 3:** Develop a checklist to track implementation (ETC Subcommittee).

**Timeframe:** Fall 2023.

**Priority 4:** Identify leadership training (e.g. Linked In learning) available and develop AAFCO-specific training based on Priority 1 for delivery.

- Develop for different delivery modalities (e.g., online and in person).

**Timeframe:** Fall 2023.

**Priority 5:** Implement training and tracking.

**Timeframe:** January 2024.

2. Future Leadership – Identify potential leaders (e.g. Vice Chairs, Subcommittee chairs and working group leads) to support AAFCO (Board and Committee Chairs).

**Responsible:** Board Work Group (include President Elect and Nominating Committee)

**Deliverable:**

- Detail a process to identify potential leaders and their development (e.g., Vice Chairs, Subcommittee chairs, and working group leads) to support AAFCO.

**Timeframe:** Seminar 2023

### **Objective 1.3 – Identify and pursue opportunities that improve financial management and advance organizational health**

Narrative: Evaluate procedures, identify gaps, establish and implement procedures to improve financial management. Identify financial training needs (e.g., budget and investment training). (Note: this could be in training activity above.) Achieve two years of operating funds in reserves.

#### **Tasks**

1. Explore and implement grant and other funding opportunities that expand and align with AAFCO strategic goals

**Responsible:** Executive Director (ED) (could include Board WG and/or Finance Committee (FC)); National Association of State Departments of Agriculture (NASDA) or Association of Food and Drug Officials (AFDO) could be resources since they are more experienced.

**Deliverable:** Seek new cooperative agreements. How many attempts/requests and how much received within timeframe to achieve two years' operating costs (amount Board is comfortable with having in reserves).

**Timeframe:** Report out to Board at Midyear and Annual Meetings (FC will be reporting to Board monthly; recognize individual grants, etc., could have more frequent reporting requirements (e.g., monthly)).

2. Establish charitable giving/scholarship framework.

**Responsible:** Strategic Affairs Committee (SAC) and FC

**Deliverable:** Completion of guidelines for recommendations to the Board within one year and Board implementation within two years.

- Aligns with organizational health, not with financial management improvement. Could be scaled. One charity per year that President recommends and Board approves. Could include educational scholarships or endowment foundation. Develop thresholds and guidelines when revenue allows.
- Should report out at Midyear and Annual. Could include report back from recipients at member meetings.

**Timeframe:** Annual Meeting 2024.

3. Develop a procedure to identify resource needs associated with proposed projects (e.g., contract) for association review and approval (e.g., Pet Food Label Modernization, Hemp, NASDA cooperative agreement).

**Responsible:** ED, then FC

**Deliverable:** Need to develop tool (held in member toolkit), guidelines/procedures. Tools/templates developed, implemented (including member education) and tracked for maintenance. FC will develop criteria for decision making on when to utilize contract resources (such as for quickly needed projects).

- Ensure tool and education for members on how to request resources is in leadership material.

**Timeframe:** Develop method/tool by August 2023 and implement by January of 2024

4. Pursue revenue-generating opportunities to maintain a sound financial base.

**Responsible:** ED

**Deliverable:** Myriad of opportunities; one example: non-regulated entities set up booths, sponsors. Additional training and refreshers. Could do biennial brainstorming session at Seminar. ED pulls realistic ideas and conceptualizes.

**Timeframe:** Report to Board at Midyear for consideration in next fiscal budget.

## **GOAL 2: Enhance Member Support and Education Resources**

(Members are supported through the development of tools, resources, education, and other efforts).

### **Objective 2.1 – Be the leading training resource for animal food regulators and laboratories within 5 years.**

Narrative: AAFCO has and will gather, develop and/or deliver, and serve as a repository for training material and/or activities. AAFCO doesn't necessarily do all of this ourselves.

#### **Tasks**

1. Develop a library of technical training resources, including both internal and external sources (videos, white papers, etc.) for laboratories. ETC is already developing an analogous library for animal food regulators in LMS system.

**Responsible:** Laboratory Methods and Services Committee (LMSC), Proficiency Testing Program (PTP)

**Deliverable:** Create a training resources library section on the AAFCO website.

**Timeframe:** January 2024 and reviewed annually for relevant information

2. Evaluate the training resources library at each Midyear Meeting to determine whether any of them are appropriate for additional in-person training at future AAFCO meetings or other locations.

**Responsible:** LMSC, PTP

**Deliverable:** Identify and work to deliver one in-person training opportunity each year.

**Timeframe:** January 2024 and reviewed annually for relevant info

3. Develop and conduct an annual committee survey for laboratories to include with that of animal food regulators to determine training needs that can be delivered in concise timeframes (e.g., 1–2 hours).

**Responsible:** ETC

**Deliverable:** Conduct an annual survey and create a list of training priorities for review by the Board for approval and implementation. Need to investigate and coordinate with FDA annual survey (animal food regulators; confirm not lab). Board will review and make assignments at their September Board meeting. Board will assign to appropriate committees (October 2023). Develop a documented process for proponents to identify training needs on an ongoing basis (e.g., outside of the survey timing).

**Timeframe:** Survey conducted Annual 2023.

### Comments for consideration when addressing the tasks:

- Build a laboratory resource, based on methods using internal PTP data. For each method or analyte, identify any related whitepapers. Add a section for videos and start with the microbial sampling technique videos. Also consider a section on recorded presentations given previously. Kristie's talk at the 2022 Animal Feed Regulatory Program Standards (AFRPS) face-to-face meeting was stellar. It should be preserved.
- These resources likely exist through A2LA, Animal and Plant Health Laboratories, etc., but LMSC needs to put together the list of the most relevant ones and post it somewhere on the AAFCO website so new lab staff know where to find them.
- Resources will include space and people. I would love to see a microscopy workshop be held with Annual or Midyear – however, this would require a location that could provide a university-type setup with a room full of microscopes.
- AAFCO will be the repository for training resources, and once the association identifies these resources, they will need to be reviewed annually to make sure they are still appropriate. During this review we could also identify anything that could be further enhanced to in-person training.

### **Objective 2.2 – Enhance membership through recruitment, support, and sustainability.**

Narrative: Membership activities include three areas: member engagement/services/support, member recruitment, and communication.

#### **Tasks**

1. Reach out to members who haven't been attending AAFCO meetings. Why aren't they attending?  
**Responsible:** ED  
**Deliverable:** Create AAFCO letter of engagement and meet with the state feed control official virtually to help identify why the state may not be attending meetings. Data could be gathered via engagement survey. Given poor survey responses, targeted calls to states might be more effective. Offer full scholarship to attend Feed Administrator Seminar. Evaluate the reasons members aren't participating and provide recommendations to increase participation.  
**Timeframe:** March 1, 2023 (in time for FAS registration), and ongoing as permanent practice
2. Stabilize committees with added participation.  
**Responsible:** Current Issues and Outreach Committee (CIOC)  
**Deliverable:** Reach out to newer people to introduce them to committees and reach out post-meeting to determine if they would be willing to join any committee for participation. Assess the number of contacts made and success rate measured through new members participating on committees.  
**Timeframe:** January 2023
3. Expand scholarship program to drive participation for new attendance.  
**Responsible:** FC  
**Deliverable:** Establish enhanced scholarship program based on feedback from Task 1 activities and Task 5 meeting feedback. Assess scholarship program success and provide recommendations for improvement.  
**Timeframe:** March 2023
4. Develop and implement member toolkit and periodic newsletter.  
**Responsible:** CIOC/ED  
**Deliverable:** Develop a member communication toolkit, and restart newsletter, to be sent periodically (TBD) to members and advisors, and published on the AAFCO website. Encourage members to share communication items with their leadership. Evaluate relevancy with members at least twice per year (could be discussed at Seminar). Consider whether website "hits" (open rates on email) can be measured to assess engagement with toolkit/newsletter.  
**Timeframe:** Midyear Meeting 2023
5. Transfer the Event Planning Workgroup to a new Subcommittee to oversee Midyear and Annual Meeting, similar to Seminar Subcommittee. This becomes an ongoing subcommittee that reports to ETC.  
**Responsible:** CIOC with FASS support.

**Deliverable:** Confirm members of Subcommittee complete with chairperson. Evaluate attendance and consider meeting evaluations to assess meeting relevance/success to members. Ensure timely development of meeting agendas.

**Timeframe:** January 2023.

**Comments for consideration when addressing the tasks:**

- Engagement survey results were poor. The task was abandoned after two attempts and sent back to the Board. Engagement should be treated like a program with inputs, short-term, mid-term, long-term objectives, and evaluation points to determine success.
- CIOC was going to break engagement survey apart and have states call states. However, they were stretched too thin.
- Increased participation/attendance at meetings, increased web and BIN traffic, increased satisfaction of AAFCO members would be indicators of enhanced membership.
- ED could work with FASS to establish what our current membership engagement numbers are, so we have a baseline to compare to and build on.
- Enhancing membership could be measured through the survey at the end of each meeting. We should be utilizing surveys more to gauge progress. Survey results are either forgotten altogether or are developed secondarily to the meeting itself. We should be tracking progress across years via surveys. Surveys should be developed with the idea that the data will build.
- New subcommittee would serve to make sure the Midyear and Annual Meetings have well-planned activities for new members as well as being another subcommittee opportunity that members could serve on to be more engaged.

**GOAL 3: Advance Human and Animal Health and Safety**

(Regulatory and laboratory initiatives promote the health and safety of humans and animals)

**Objective 3.1 – Promote and integrate Animal Food Safety Systems.**

Narrative: Develop and promote a food chain-focused safety purpose, activities, and coordination for animal food regulatory agencies. Evaluate current system or systems already in place, identify gaps in model bill and regulations, collaborate with State and Federal Regulatory food/feed agencies, establish and publish guidance materials and resource links. Multiple components are needed to make a strong Animal Food Safety Program that works cooperatively with FDA to advance human and animal health and safety. This objective aims to develop a roadmap that identifies some of the components that are needed to achieve this goal.

**Tasks**

1. Identify the elements (roadmap) and implement the activities needed to achieve the objective (considering the narrative (above) and tasks (below)). Note: A task related to evaluating the current system and identifying gaps may need to be added.

**Responsible:** Feed and Feed Ingredient Manufacturing Committee (FFIMC), Inspection and Sampling Committee (ISC), Enforcement Issues Committee (EIC) (joint meeting of committee leaders to develop the plan)

**Deliverable:**

- Identify needs, gaps, and strategically plan activities (e.g., roadmap)
- Realign the following tasks in accordance with the planned elements.

**Timeframe:** Virtual calls before Midyear 2023 (two calls @ 1 hour each – Chairs, Vices, Board Liaisons, President Elect, ED)

The remaining tasks in 3.1 will be adjusted based on the outcome of Task 1 group calls.

2. Develop messaging on impact of animal feed safety to human health with three audiences:
  - Regulatory agency leadership
  - Feed manufacturers, including food processors
  - Consumers

**Responsible:** CIOC

**Deliverable:**

- Design a flyer that can be distributed at meetings and as a resource for State Regulatory agencies to use to educate consumers and manufacturers.
- Develop a member informational platform containing guidance materials, resource links, and a fact sheet to members and advisors, and published on the AAFCO website.

- Promote resources to ensure awareness
- Work with website redesign group to create ability to evaluate/track viewing of resources to measure impact. Add pop-up to ask if information was helpful (Yes/No answer).

**Timeframe:** Prepare and provide during Midyear Meeting 2024

3. Align Chapter 5 of the OP with AFRPS. (Note: MBR was aligned with FSMA as part of 2017–2020 Strategic Plan. Some committees are already working on parts of Chapter 5 material.)  
**Responsible:** EIC, ISC, FFIMC, Feed Labelling Committee (FLC), LMSC support (Committees with relevant sections)

**Deliverable and Timeframe:**

- Identify current gaps by Midyear 2024
- Update Chapter 5 sections by Dec. 2025

4. Increase communication/collaboration among State and Federal Regulatory food/feed agencies

**Responsible:** Board

**Deliverable:** Evaluate the merit of AAFCO Board meeting with ORA/CVM leadership twice a year (one meeting could be virtual). Implement a second meeting if warranted. Develop SOP with FASS Executive Assistant to facilitate meeting organization.

**Timeframe:** Dec. 2023

**Responsible:** Board – President

**Deliverable:** Send letter to Co-Chair of PFP (currently Barbara Cassens?) to increase participation by AAFCO. (Consider adding ED and AFDO liaison as AAFCO participants)

**Timeframe:** Dec. 2023

**Responsible:** ISC

**Deliverable:** Integrate FDA state liaisons into Advanced Inspector Training (AITS). (May be in progress but limited due to travel restrictions)

**Timeframe:** Dec. 2023

5. Act as Liaison to other organizations to monitor impacts on animal food safety systems.

**Responsible:** Board led with ED as liaison

**Deliverable:** Create/maintain relationships upon joining AAFCO. Identify relevant organization to connect and facilitate relationships with (e.g. Food and Agriculture Organization, CODEX, Partner Countries Canadian Food Inspection Agency, World Health Organization, AFDO, NASDA, FDA). Evaluate the merit of liaison activities (time effectiveness).

**Timeframe:** Dec. 2023 with evaluation annually thereafter.

**Comments for consideration when addressing the tasks:**

- *Possible Task:* Collaboration to include sharing non-contract inspection outcomes and analytical results.
- *Possible Task:* Create an Annual Report of what peer organizations have done every 6 months, 12 months, etc.
- Make Roadmap a Logic Diagram for program development.
- *Task Idea:* Develop a model Animal Feed Program and define roles and responsibilities that include model job descriptions and baseline salary suggestions for each role. Specify the duties of each position, the importance it has to both animal food and human food, and then communicate this to members so it can be used to justify additional positions or reorganizations in state programs. Each role could be further developed to show how different positions interact with other agencies, FDA, NASDA, etc., to advance human and animal health and safety. Note that a Model Feed Safety Program and Development Guide were put together for this purpose a number of years ago. They were published in the OP for a number of years. It was last included in the 2016 version, Chapter 5 (pages 260 and 262).
- Survey results have been poor. Engagement should be treated like a program with inputs, short-term, mid-term, long-term objectives, and evaluation points to determine success.
- CIOC was going to break engagement survey apart and have states call states. However, they were stretched too thin.
- Increased participation/attendance at meetings, increased web and BIN traffic, increased satisfaction of AAFCO members would be indicators of enhanced membership.

- ED could work with FASS to establish what our current membership engagement numbers are, so we have a baseline to compare to and build on.
- Task 2 could be incorporated into the website re-design. CIOC could develop separate messages for these 3 groups explaining how feed safety affects human health.
- AAFCO should consider whether some incentive to states would help increase participation. Perhaps pay travel costs for one individual. Limit to a certain number that apply first, depending on money available.
- Task 5: Prior to looking to external relationships, evaluate whether our liaisons are currently doing their jobs within AAFCO. Do our liaisons know what is going on in committees? Some accountability or a reason why liaisons are not keeping up with committee work should be considered. Maybe some are better than others. This liaison relationship should be focused on in the plan to “build better board members.” Moving externally – external liaisons should be reporting monthly. It may be an update of nothing, but there should be time left for 5-minute updates. It is important for us to maintain relationships with other “like” organizations in North America and monitor what is happening worldwide that may eventually affect us to prepare for any changes in laws. Monitoring changes is needed so AAFCO knows if we need to reach out to members when they may be impacted by legislative changes in their state or when we should make changes to the Model Bill and Regulations.
- How is what a peer organization is doing relevant to AAFCO? Perhaps an annual report highlighting what peer organizations are doing allows us to foster closer relationships with other organizations and communicate to our members different resources that may be available, to help the ultimate goal of advancing human and animal health and safety. AAFCO members are busy and sometimes struggle to keep up with everything that multiple organizations are doing. AAFCO can assist by compiling and sharing the most relevant things to our members.

**Objective 3.2 – Promote and integrate laboratory technology, methods, quality systems, and collaboration in support of Animal Food Safety Systems.**

Narrative: Identify training and method needs of regulatory laboratories, collaborate with State and Federal Regulatory food/feed agencies to obtain methods, establish, and publish Best Practice guidance materials and resource links on AAFCO LMSC website. Design, implement and provide a training program for state regulatory laboratorians. Establish a Quality Assurance committee under the AAFCO LMSC to update and provide resources related to quality and accreditation. Provide a link on AAFCO website where state regulatory and state laboratory personnel can gain information on laboratory capabilities.

**Tasks**

1. Identify the elements (roadmap) and implement the activities needed to achieve the objective (considering the narrative (above) and tasks (below)).  
**Responsible:** FFIM, LMSC (joint meeting of committee leaders to develop the plan)  
**Deliverable:**
  - Identify needs, gaps, and strategically plan activities (e.g., roadmap)
  - Realign the following tasks in accordance with the planned elements.**Timeframe:** Virtual calls before Midyear 2023 (two calls @ 1 hour each – Chairs, Vices, Board Liaisons, President Elect, ED)  
The remaining tasks in 3.2 will be adjusted based on the outcome of Task 1 group calls.
2. (Potential element of Task 1) Conduct annual survey of state regulatory programs (SRP) to identify their testing needs. Utilize information obtained from the SRP survey to develop and administer a survey of state laboratories to see what they need to address the needs of the SRP.  
**Responsible:** FFIM, LMSC, and include Pet Food Committee (PFC), due to the label modernization changes that will be taking place.  
**Deliverable:**
  - Send an annual Regulatory Method Needs Survey to State Regulatory Program Managers to access, rank, and guide laboratory method and resource needs.
  - Compile and present results of the survey
  - Prioritize needs based on survey results
  - Create or charge individual LMSC working groups with obtaining methods, planning training, and creating Best Practice Guidance documents for state laboratories

- Publish resources on AAFCO website
- Timeframe:** Summer 2023 (this is being done now), annual each summer after
3. (Potential element of Task 1) Develop and submit for approval projects to address needs as identified in annual survey.  
**Responsible:** LMSC lead, with FC and Board support  
**Deliverable:**
    - Develop training plans and training workshop proposals to submit for Board approval
    - Develop method needs statements for approval and plan to obtain funding for method development/validation projects for approval by Board**Timeframe:** Summer 2024
  4. (Potential element of Task 1) Establish best practices document for collaboration between the SRP, laboratories, and FDA with the goal to improve communication and work planning.  
**Responsible:** LMSC  
**Deliverable:**
    - Establish working group committees within LMSC to collaborate and create documents
    - Write Best Practice document(s)
    - Publish Best Practice documents on AAFCO website as a resource for state laboratories
    - Present documents during LMSC meetings to raise awareness**Timeframe:** Summer 2025
  5. (Potential element of Task 1) Identify training gaps among laboratories and the tools needed to increase staff competencies.  
**Responsible:** LMSC  
**Deliverable:**
    - Send annual laboratory surveys to assess needs
    - Compile and present results of survey during LMSC meetings
    - Prioritize needs based on survey results
    - Develop training plans and training workshop proposals to submit for Board approval
    - Promote training through AAFCO website to increase participation and reach those laboratories that do not regularly attend AAFCO meetings
    - Collaborate with AAFCO PTP to send participant(s) post-training competency samples to assess training effectiveness
    - Create a training evaluation form to be completed by participants post-training**Timeframe:** Summer 2025

**Comments for consideration when developing the roadmap in Task 1:**

- The challenge is trying to ensure that the needs of both the state regulatory program and the laboratory are met and are synched with each other. The deliverable would be to develop a survey to send to the state regulatory program as well as state laboratories to identify needs of each. The committees would decide the survey questions, or what the surveys should look like. The results of the surveys would provide additional information on how to proceed further with the other Tasks.
- Should create an evaluation form to determine project success.
- Given the limited response to surveys, additional action should be considered. Suggestion: Daily surveys at meetings or workshops could be conducted during dedicated meeting time. The last 5 minutes during a meeting could be set aside to conduct a survey via a QR code. This might significantly improve responses.
- Improved communication and work planning should be assessed. Verbal assessment could be carried out or a survey done during workplanning meeting.
- Workplanning deliverable should be the document along with a plan to implement it.

The Working Groups provided additional feedback on other potential Tasks (below) associated with this Objective. They did not feel they needed to be completed at this time. Task 1 group should consider these and adjust the overall plan accordingly.

(Potential element of Task 1) Task – Funding capability from AAFCO. Needs training element too, with sufficient priority and work to maintain proficiency (FERN lab concept). Consider adding microscopy to hazards. Provide funding for more method development for Biological and Chemical hazards in animal food.



**WG comment:** There is funding within AFRPS and LFFM to assist laboratories in method development. Not sure additional funding sources would be needed.

(Potential element of Task 1) Task – Develop a database of core competencies of each state lab so all labs know where to go for assistance or training where they may have a shortcoming or lack of ability to perform certain tests. IFPTI have one but have to be APHL member. Need to educate about APHL so people better understand value. Needs investigation regarding AAFCO role. Encourage labs to promote and participate in existing system

**WG comment:** Not really sure how to address this topic. It might be part of Task 4 above.

(Potential element of Task 1) Task – needs elaboration to make specific task – e.g., promote PTP instead of leverage. Is it meant to align PTP with integrated animal food safety system? PTP is more nutrition than hazard: should it be expanded? Leverage PTP program and sampling data.

(Potential element of Task 1) Task – Need common consistent collection of data. If a priority, need activity broken down into manageable activities. Very big task. Need access to data first. Create data mining systems that can predict animal food mycotoxin hazards.

**WG comment:** This is currently being done through LFFM.

#### **GOAL 4: Foster External Stakeholder Relationships**

(Relationships with external stakeholders are fostered to provide advancement opportunities for the Association)

##### ***TABLED***

#### **Objective 4.1: – Identify stakeholders with common interests in order to prioritize, develop, and maintain professional relationships that advance AAFCO's Vision and Mission.**

Narrative: Stakeholder groups could be very extensive, so identification and prioritization of select stakeholders will be key. Advancement opportunities could include financial, Association recognition, and increased dialogue.

- o T – Identify what AAFCO wants from each stakeholder.
- o T – Evaluate current relationships for areas of improvement.
- o T – Constantly evaluate whether we have relationships with all organizations that we should be working with.
- o T – *Intended for members (Richard). Moved to Group 2. Need to define what a personal relationship is. Need to define “feed regulatory agencies.”*
- o T – Increase attendance by new associations to AAFCO meetings and expand representation on committees
- o T – Create a task force or committee that focuses on issues from stakeholders
- o T – Send stakeholders a survey to assess needs for improvement
- o T – *If ASAHA is defined as a priority stakeholder.* Investigate possible integration/interaction with applicable committee(s) in USAHA
- o T – *See bullet above.* Liaison to USAHA?
- o T – *If ASAHA is defined as a priority stakeholder.* Liaison to AVMA?
- o T – *Moved to Goal 3 for consideration.*
- o T – Communicate directly with AAFCO stakeholders. Identify and list stakeholders and assign a liaison (not necessarily a Board member). Assigned liaison keeps stakeholders in the AAFCO loop by email and phone and reports back to the Board before each AAFCO meeting.
- o Communication
  - Expand AAFCO presence at conferences and trade shows, measuring the impact of our attendance. (This would include speaking engagements.)
  - Increase our media presence through press releases and other promotional activities to expand our brand and awareness of important issues.
- o T – *From Group 3: Doesn't fit in program alignment; moved to Group 4, as intended beneficiary is consumer. Note there is a component promoting State adoption. Added State adoption component to Group 2 for consideration as well, regarding regulatory uniformity. Complete and implement Pet Food Label Modernization Initiative (multi-year objective).*

[illegible]