



AAFCO
Association of American Feed Control Officials

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Association Business Meeting Minutes

2022 AAFCO Annual Meeting
August 4, 8:30–10:00 am (CDT), St. Louis, Missouri

Agenda

1. **Meeting Called to Order 8:43 am CT**
2. **Convene Business Session of the Association:** George Ferguson, President
 - a. Welcome & Opening Remarks
 - b. Announcement of New Life Members
 - i. Brett Groves, Office of Indiana State Chemist (AAFCO Member 1999–2022)
 - c. Presentation of Awards
 - i. Distinguished Service Award: Hollis Glenn and Scott Ziehr for their time, dedication, and leadership in hosting the 2021 and 2022 Feed Administrator's Seminar.
3. **Acceptance of Committee Reports From:** Current Issues and Outreach, Education and Training, Feed and Feed and Feed Ingredient Manufacturing, Feed Labeling, Ingredient Definitions, Ingredient Definitions eMeeting 03/23/22, Ingredient Definitions eMeeting 05/03/22, Laboratory Methods & Services, Model Bills and Regulations, Pet Food, Proficiency Testing Program, Strategic Affairs – Austin Therrell, President-Elect
(Reports are published on the AAFCO website on the 2022 Annual Meeting page, right side, under the heading “Committee Reports.”)
Austin Therrell moves to accept committee reports, Scott Ziehr Seconds. Motion Carries.
4. **Acceptance of Committee Recommendations:** Austin Therrell, President-Elect
 - a. **Pet Food Committee:**
 - i. Replace the current “Human Grade” Guidelines which start on page 158 of the 2022 Official Publication, with the revised Guidelines for “Human Grade” Claims below.
Guidelines for “Human Grade” Pet and Specialty Pet Food Claims
AAFCO recommends and supports the following guidelines for the use of the term “human grade” in the labeling of pet foods and specialty pet foods. Pet and specialty pet foods using the labeling claim “human grade” are first and foremost animal food products and subject to inspection under 21 CFR part 507. In order to substantiate that a human grade claim is truthful and not misleading, these guidelines describe how all human grade pet food products should be manufactured in accordance with the applicable human food regulations for a ready-to-eat human food.
 1. In the AAFCO defined feed term “human grade”, the use of the term “human grade” is only acceptable in reference to the product as a whole. The feed term specifies that every ingredient and the resulting product must be stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR part 117 and those applicable federal human food laws as required by ingredient, process and/or facility type.
 2. All facilities that process or package a final “human grade” pet food product that is considered ready-to-eat must register with FDA as a food facility operating under both General Product Categories (Food for Human Consumption & Food for Animal Consumption) as found in *Section 9a of the U.S. Food and Drug Administration Food Facility Registration*.
It shall be the manufacturing firm’s responsibility to ensure it is able to manufacture in a human food facility and be licensed/registered and inspected by the authorized agency for human food production. Human Grade Pet Food claims are voluntary, and as such, no feed control official, neither state nor federal, can mandate that a human food authority license a facility that is only manufacturing a pet food product.
 3. The firm must maintain written procedures to help ensure “human grade” products are stored, transported, and handled throughout the distribution channel in a manner that maintains the product’s “human grade” status.
 4. In order to substantiate that a “human grade” pet food claim is truthful and not misleading on products under the federal authority of FDA for human food production and subject to 21 CFR Part 117, the firm must maintain and make available upon request, documentation (e.g., affidavits) sufficient to show that:

- a. All individual ingredients supplied to the manufacturer that are further utilized in the manufacture of human grade pet food, are fit for human consumption.
 - b. Every ingredient and the resulting product are stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR part 117 and the final product is considered ready-to-eat.
 - c. The manufacturing facility is licensed to produce human food by all appropriate/required authorities.
5. In order to substantiate that a “human grade” pet food claim is truthful and not misleading, on products that are under the federal authority of an agency other than FDA for human food production (e.g., USDA FSIS):
- a. Where final processing (i.e., mixing, blending) and/or packaging occurs in a registered FDA Human Food Facility subject to 21 CFR Part 117, the firm must maintain and make available upon request, documentation (e.g., affidavits) sufficient to verify that:
 - i. The product is ready-to-eat with all included ingredients processed, packed, held, and shipped in compliance with the applicable federal regulations for the manufacture of human foods prior to final mixing/blending and/or packaging.
 - ii. All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food.
 - iii. The FDA facility that processes and/or packs the “Human Grade” Pet Food is licensed to produce human food by all appropriate/required authorities.
 - b. Where final processing (i.e., mixing, blending) and/or packaging occurs in a non-FDA food facility producing human food (e.g., slaughter plant), the firm must maintain and make available upon request, documentation sufficient to verify that:
 - i. The product is ready-to-eat with all included ingredients processed, packed, held, and shipped in compliance with the applicable federal regulations for the manufacture of human foods prior to final mixing/blending and/or packaging.
 - ii. All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food.
 - iii. The processing and/or packing of the final product is conducted in an area/room identified within the facility’s required HACCP/Food Safety Plan as an area/room that can be used for the blending, packaging, repackaging and/or labeling of an edible ready-to-eat food.
 - iv. The non-FDA facility that processes and/or packs the “Human Grade” Pet Food is licensed to produce human food by all appropriate/required authorities.
 - c. The manufacturer of a pet food or specialty pet food product with “human grade” claims must ensure:
 - i. It is clearly labeled for its intended use as animal food, such as “dog food” or “cat treats”.
 - ii. No statements of quality or grade appear in the ingredient statement [PF5(d)(3)].
 - iii. The largest or most prominent use of the term “human grade” on each panel of the label and any labeling (brochures, point of sale materials, websites, etc.) must be juxtaposed with the statement of intended use (e.g., human grade dog food or human grade cat treats), in the same style, color print, and type size as the term “human grade”.
 - iv. A claim of “human grade ingredients” is only acceptable if the product as a whole meets the requirements of the “human grade” pet food term; and

- v. The label is in compliance with all applicable labeling rules, including any voluntary labeling allowed under participation in the Agriculture Marketing Service Process Verified Program.

Board Recommends Acceptance. Austin Therrell moves, Ben Jones Seconds, Motion Carries.

b. Ingredient Definitions Committee:

- i. Board recommends acceptance of the replacement of the current Human Grade feed term, in Chapter 6 under “Feed Terms and Definitions” which start on page 344 of the 2022 Official Publication, with the updated Human Grade term. “Human Grade. Every ingredient and the resulting product must be stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR Part 117 and those applicable federal human food laws as required by ingredient, process and/or facility type.”

Board Recommends Acceptance. Austin Therrell moves, Stan Cook Seconds, Motion Carries.

- ii. Publish a new tentative definition relating to organisms in 36.11 Dried Fermentation Product to allow the use of *Lactobacillus diolivorans* as a silage inoculant. Leave the existing definition in place. Pg. 399. “**T36.11 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 *Lactobacillus diolivorans* 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*, *Lactobacillus diolivorans*, *Lactobacillus delbrueckii* or *Enterococcus faecium*, or as permitted by FDA.]”

Board Recommends Acceptance. Austin Therrell moves, Miriam Johnson Seconds, Motion Carries.

- iii. Make the following changes in ODI and publish the changes for record in the Official Publication, starting on page iii (tentative changes do not go into ODI) **

ODI Action	Name	Reference	Comments
New Name	Dried <i>Lactobacillus diolivorans</i> Fermentation Product	36.11	Business meeting 8/4/22

Board Recommends Acceptance. Austin Therrell moves, Scott Absher Seconds, Motion Carries.

- iv. Remove Pennyroyal American and Pennyroyal European from table listed in definition 87.30 Flavoring Agents, beginning on page 471 of the 2022 electronic OP, and list them in section 99 as Withdrawn Ingredients.

Board Recommends Acceptance. Austin Therrell moves, Eric Brady Seconds, Motion Carries.

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

ODI Action	Name	Reference	Comments
Remove reference	ferric choline citrate	90.26	IDC meeting 2/24/22
Remove ingredient	Pennyroyal, American		Business meeting 8/4/22
Remove ingredient	Pennyroyal, European		Business meeting 8/4/22

Board Recommends Acceptance. Austin Therrell moves, Cody Walls Seconds, Motion Carries.

- vi. Remove footnote regarding Molasses collective term listed on page 375 of the 2022 Official Publication “~~The molasses collective term is not recognized by the FDA (21 CFR 501.110).~~”

Board Recommends Acceptance. Austin Therrell moves, Scott Ziehr Seconds, Motion Carries.

- vii. Publish a new Official Definition 33.29 Black Soldier Fly Larvae Oil on Page 407 of the 2022 Official Publication and to delete the tentative definition, T33.29. “**33.29 Black Soldier Fly Larvae Oil** is the product obtained by mechanically extracting the oil from dried larvae of Black Soldier Fly, *Hermetia illucens*, that have been raised on a feedstock

composed exclusively of feed grade materials. It is intended for use in swine and finfish feed as a source of energy consistent with good feeding practices. It consists predominantly of glyceride esters of fatty acids and contains no additions of free fatty acids or other materials obtained from fats. It must contain, and be guaranteed for, not less than 90% total fatty acids, not more than 2% unsaponifiable matter and not more than 1% insoluble impurities. Maximum free fatty acids and moisture must also be guaranteed. If an antioxidant(s) is used, the common name or names must be indicated, followed by the words “used as a preservative”. (proposed xx , adopted xx)”

Board Recommends Acceptance. Austin Therrell moves, David Snell Seconds, Motion Carries.

- vi. Delete the existing Official Definition, 60.117 Dried Black Soldier Fly Larvae, and replace the Official Definition with T60.117(C) Dried Black Soldier Fly Larvae on page 445 of the 2022 Official Publication. “**T60.117 (C) Dried Black Soldier Fly Larvae** is the dried larvae of the Black Soldier Fly, *Hermetia illucens*, with or without mechanical extraction of part of the oil, that has been raised on feedstock composed exclusively of feed grade materials. The ingredient must be labeled with guarantees for minimum crude protein and minimum crude fat on an as-fed basis. If oil is mechanically extracted, maximum crude fat must also be guaranteed on the ingredient label. The ingredient is dried by artificial means to no more than 10% moisture. It is for use in salmonid, poultry, and swine feed **and in adult dog food**, as a source of protein and fat consistent with good feeding practices. (Proposed 2022, amended xx)”

Board Recommends Acceptance. Austin Therrell moves, Scott Absher Seconds, Motion Carries.

- vi. Delete the existing official definition 70.309 Urea Formaldehyde Condensation Polymer on page 458 of the 2022 Official publication and replace it with T73.309 Urea Formaldehyde Condensation Polymer. “**T73.309 Urea Formaldehyde Condensation Polymer** is an amino resin that may be used in animal feeds: (a) as a pelleting aid, excluding feed for aquatic species. The free formaldehyde must not exceed 0.1 ppm in the finished pelleted feed, and (b) as an agent to reduce the solubility and fermentation of soybean meal intended for ruminant feed. It must not exceed 1% of the treated soybean meal. (Proposed 2022)

Board Recommends Acceptance. Austin Therrell moves, Miriam Johnson Seconds, Motion Carries.

- vii. Make the following changes in ODI and publish the changes for record in the Official Publication, starting on page iii (tentative changes do not go into ODI) **

ODI Action	Name	Reference	Comments
Add ingredient and reference	Black Soldier Fly Larvae Oil	33.29	Business meeting 8/4/22
Remove ingredient	Calcium lignin sulfonate		Business meeting 8/4/22
Add ingredient and reference	Hydrophobic Silica	Table 101.1	Business meeting 8/4/22
Add ingredient and reference	Polyethylene glycol (400) dioleate	Table 101.1	Business meeting 8/4/22
Add ingredient	Polysorbate 60	Table 101.1	Business meeting 8/4/22
Add ingredient	Phytase	Table 101.1	Business meeting 8/4/22
Add ingredient	L-Methionine 85%	Table 101.1	Business meeting 8/4/22
Add ingredient	Canthaxanthin	Table 101.1	Business meeting 8/4/22
Add ingredient	L-Glutamine	Table 101.1	Business meeting 8/4/22
Add ingredient	<i>Saccharomyces cerevisiae</i> expressing xylose isomerase from <i>Piromyces</i> sp. E2	Table 101.1	Business meeting 8/4/22
Add ingredient	L-methionine 90%	Table 101.1	Business meeting 8/4/22

Add ingredient	Dried Methylobacterium extorquens biomass	Table 101.1	Business meeting 8/4/22
Add ingredient	Clinoptilolite of sedimentary origin	Table 101.1	Business meeting 8/4/22
Add ingredient	Krill Meal	Table 101.1	Business meeting 8/4/22
Add ingredient	Beta-Glucanase	Table 101.1	Business meeting 8/4/22
Add ingredient	Dried L-threonine fermentation product	Table 101.1	Business meeting 8/4/22
Add ingredient	Marine microalgae oil	Table 101.1	Business meeting 8/4/22

Board Recommends Acceptance. Austin Therrell moves, Steve Gramlich Seconds, Motion Carries.

****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.

c. **Feed & Feed Ingredient Manufacturing Committee:**

- i. Update the Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients in Chapter Five of the AAFCO OP, following the Analytical Variations (AV) on Page 306 of the 2022 AAFCO Official Publication.
Review Appendix 1

Board Recommends Acceptance. Austin Therrell moves, Tom Phillips Seconds, Motion Carries.

d. **Strategic Affairs Committee:**

- i. Insert the new “AAFCO Policy On Resolutions” in Chapter 5 of the 2022 Official Publication beginning on page 241.

Strategic Affairs Minutes 20220309

TEXT REVIEWED AND EDITED BY FASS: March 9, 2022 version

AAFCO POLICY ON RESOLUTIONS (adopted 8/4/22)

I. PURPOSE

Each year prior to the AAFCO Association Business Meeting, resolutions are submitted to the AAFCO Board of Directors by members or committees for consideration. Through this process, members and committees may raise concerns and suggested action relating to legislative, regulatory, and technical issues as they apply to commercial animal feed and food safety issues.

II. SCOPE

To establish protocols for the receipt and consideration by members of proposed resolutions submitted through the AAFCO Board of Directors that involves procedures, format, and frames.

III. PROCEDURES

1. In January of each year, the President shall call for resolutions at the Midyear Association Business Meeting. The Executive Director may follow up with members through additional communications and seek the submission of resolutions by members and committee chairs.
2. Proposed resolutions will be accepted only if they come from an AAFCO member representative or committee recommendation. If needed for explanatory purposes, a resolution should be accompanied by a statement (not to exceed one page) summarizing the purpose and the justification for the proposed resolution. Guidance and resolution samples will be provided to members to assist with drafting.
3. The Executive Director shall receive and accept all resolutions that meet established guidance on clarity and form and may modify language if deemed advisable, as long as the intent is not changed and the change is in consultation with the resolution sponsor. The Executive Director may

- consolidate resolutions that are similar in content and intent and so indicate when presenting the revised resolution to the Board.
4. The Executive Director, by tradition, shall also prepare and present at the time and place of AAFCO Annual Meeting additional resolutions that are of a memorial or recognition nature or in good etiquette and are appropriate for the Association.
 5. All proposed resolutions reviewed and accepted for clarity and form by the Executive Director shall be submitted to the Board of Directors no later than 60 days prior to the Annual Meeting for approval by the Board of Directors. The Board may invite the sponsor of the resolution to attend a Board of Directors meeting to provide context for the resolution and answer questions. Resolutions that are not passed by the Board of Directors for approval shall not be provided to members for consideration at the Annual Association Business Meeting.
 6. The President or President-Elect will be responsible for coordinating the inclusion of the Board-approved proposed resolutions, which are to be presented for membership approval, into the meeting materials for the Annual Association Business Meeting.
 7. All resolutions reviewed and approved by the Board of Directors shall be presented to the membership during the Annual Association Business Meeting by the President-Elect, with the Board of Directors' recommendations of approval.
 8. Floor action on resolutions shall be by two-thirds majority vote of the members present or by proxy at the Annual Association Business Meeting, which constitutes a quorum.
 9. The AAFCO Board of Directors shall initiate all action required by the approved resolutions and will attempt to achieve the resolution's intent during the ensuing year. Board members may delegate actions to the Executive Director or Committee Chairs for implementation.
 10. The Executive Director shall coordinate the posting of resolutions on AAFCO's website and forward copies to appropriate parties at the direction of the Board of Directors. Response to a resolution may be posted on AAFCO's website at the discretion of the Board of Directors.

IV. PROCESS SUMMARY

Benchmark	Estimated Dates	Action	Responsible Party	Notes
Midyear Association Business Meeting	January 15	Call for resolutions to members	President	Resolutions due 60 days prior to the Annual Meeting
60 days prior to the Annual Meeting	June 1	Collect, organize, review, and consolidate, if needed, resolutions for consideration by the Board	Executive Director	Executive Director assembles resolution(s) for BOD consideration
June Board meeting	June 20	Board members review and approve resolutions for membership consideration	BOD members	Resolutions not approved by the Board will not be recommended for membership consideration
Annual Association Business Meeting	August 1	Membership vote	President-Elect	During Association Business Meeting
Board Meeting at end of Annual Meeting	August 5	Board members provide direction on where to post resolution or any other action needed	BOD members	Provides direction on next steps for publishing and enacting resolution to Executive Director
30 days after	September 5	Post resolutions (other	Executive	Post approved resolutions on

the Annual Meeting		actions as needed)	Director	website
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Board Recommends Acceptance. Austin Therrell moves, Eric Brady Seconds, Motion Carries.

5. **Nomination Committee**

The Nominating Committee recommends the following slate for Board of Directors beginning January 1, 2023.

President: Austin Therrell, SC
President-Elect: Hollis Glenn, CO
Secretary-Treasurer: Ashlee-Rose Ferguson, WA
Director: Eric Brady, TN
Director: Joshua Arbaugh, WV
Director: Laura Scott, CAN
Director: Darrell Johnson, KY
Director: Dan King, MN
Immediate Past President: George Ferguson, NC

Board Recommends Acceptance. Austin Therrell moves, Eric Brady Seconds, Motion Carries.

This concludes committee and board recommendations needing membership approval.

6. **Credential Report: FASS**

Number of voting members represented: 36
Number of states in attendance: 44
Number of countries: 7 (Including USA and Puerto Rico)
Number of FDA representatives: 43
Number of life members: 8
Total meeting attendance: 456 (340 in-person, 116 Virtual)

7. **Meeting Concluded at 9:06am CT.**

Current Issues and Outreach Committee Report

2022 AAFCO Annual Meeting
August 4, 10:00–10:30 am, St. Louis, Missouri

Committee Recommendations: None

Board Recommendations: None

Committee Participants

Members Present: Jennifer Combs (KY) (Co-Chair), George Ferguson (NC), Austin Therrell (SC), Josh Arbaugh (WV), Kristen Green (KY), Hollis Glenn - BOD Liaison (CO), Tim Lyons (MI), Alan Keller (IA), Debra Gray (KS)

Advisors Present: David Fairfield (NGFA), Dana Brooks (PFI)

Virtual Attendees: Jo Lynn Otero (NM) (Co-Chair) virtual

Committee Report

The meeting started at 10:00 AM with the welcoming/opening remarks by Co-chair Jennifer Combs. Jenny introduced Tera Keatts from Philosophy Communications. Tera presented on the work that Philosophy Communications is completing with AAFCO to provide tactical communication strategy support, branding, mission and vision alignment assistance. Current Issue and Outreach Philosophy Workgroup updates on the member tool box, the Hemp Webinar and website re- design were also presented by Tera.

Jenny thanked the Event Planning Committee for all the work to put the meeting together, re-capped the events from AAFCO 101 held on August 3 and thanked the Ambassadors for their assistance in welcoming the first time attendees. Request for CIOC member volunteers to work on the draft AAFCO Outreach documentation, modeled after standard 7 of the AFRPS. The sixty-seven new attendees were then asked to stand and introduce themselves to the membership.

Jenny closed the committee meeting requesting any volunteers or additional comments, there were none.

Other Business

None

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

Education and Training Committee Report

2022 AAFCO Annual Meeting
August 4, 1:30–2:15 pm, St. Louis, Missouri

Committee Recommendations: None

Board Recommendations: None

Committee Participants

Members Present: Marissa Kost – NC, Chris Berg – IA, David Dressler – PA, George Ferguson – NC, Jacob Fleig – MO, Darrell Johnson – KY, Kevin Klommhaus – FDA, Tim Lyons – MI

Advisors Present: Amanda Anderson – PFI, David Fairfield – NGFA, Pat Tovey – PFI

Virtual Attendees: Shaun Anderson – AFIA, Jennifer Godwin – FDA, Matt Frederking – NGFA, , Kimberly Hull – FDA, Traci Kelm – FDA (in lieu of Janet Williams), Kent Kitade – Lifetime Member, Rick Manthei – MN, Kate Nelson – CT, Jo Lynn Otero – NM, Jim True – KY

Committee Report

Marissa Kost (Chair) called the meeting to order at 1:40 PM (CST).

- **Training Availability Updates**

- AITS/BITS Update – Miriam Johnson, NC
 - AITS: Omaha, NE (June 2022) – new agenda/curriculum; lots of discussion; 2 days led by AAFCO Cadre; 1 day with CLEAR; looking for host state for next year (TN a possibility)
 - BITS: Oklahoma City, OK (September 2022) – 2 days in classroom and 1 day in the field; registration is open currently (~50 person attendance capacity)
- FDA OTED Training Update – Kimberly Hull & Traci Kelm, FDA OTED
 - FY23: 4 offerings each of the following iLVT – cGMP (VM102), BSE Inspection Course (VM209), Medicated Feed Inspection Course (VM214), VFD Inspection Course (VM230), PCAF Course (VM220)
 - Reminder that VM209, VM214, and VM230 are blended courses which means there are two parts; web-based training & virtual instructor led training
 - Registration handled similarly in past years; OTED course announcements distributed, course capacities, participants
 - If states are interested in offering support to OTED during course development; reach out to Kimberly or Traci
 - LearnEd: New LMS to replace Pathlore; course catalog available; Pathlore will no longer be available starting September 12, 2022; ensure pre-requisites are completed for any upcoming trainings; all records will transfer to the LearnEd system; encourage those to save/print transcript before no longer available; OTED plans to conduct an AF Inspection JTA for FY23; if you have any interest in contributing, please reach out to either individual to volunteer
 - Janet Williams – also available to answer any questions related to OTED
 - New OTED Employee: Branch 1 Manager, Daniel Yaw Osei – helping with AF program; another resource
 - Questions:
 - Jacob Fleig (MO) – will login credentials transfer to LearnEd also or will there be a re-registration process?
 - Instructions/Information for login process will be coming shortly (via email)
 - Ashlee-Rose Ferguson (WA) – Pathlore ends September 12 and LearnEd not available until September 19?
 - One “dark” week gap to transfer data between systems
 - Tim Lyons (MI) – Will the course names & IDs stay the same? – Yes
 - Austin Therrell (SC) – Any discussion about Train the Trainer Program for feed courses? Most appear to be HF courses
 - No plans at this time, but not off the table; at this time, just starting out with the HF courses

- ComplianceWire will still be maintained; just Pathlore to LearnEd
- **Workshop Calendar Request Updates**
 - ISOT (Ingredient Submission Online Training)
 - Modules expected to be released first of September; available in DigitalChalk LMS
 - Face-to-Face (Q&A portion) scheduled for Midyear 2023 in San Antonio, TX
- **New Business**
 - FAS Sub-Committee: Need an ETC member to replace Heather Bartley as sub-committee chair; also looking for host state for 2023-2024 (2 yr commitment) – contact Rick Manthei or Tim Lyons if interested
 - Rick Manthei (MN) has volunteered to fulfill this role
 - Finance Committee (FC) would like to have an ETC rep to assist with budget for trainings; help educate chairs on training endorsement policy in regards to budget
 - Ashlee-Rose Ferguson: One FC members suggested an ETC rep/liaison that has a pulse on the endorsement policy and whats coming down the pike; so FC has a better estimate of those financial requests; builing/collaborating more on the education piece; requesting training and someone who is more familiar with that piece
 - Strategic Affairs: develop new sub-committee to oversee Midyear & Annual (w/ chair)
 - Establish by January 2023
- **Workgroup Updates**
 - Training Curriculum Update
 - WG has finalized the charge (Update the 2018 Course Curriculum document), is wrapping up the schedule for objectives/deliverables, and has scheduled future meetings (every 2 months) to ensure timely completion of charge. The WG's next meeting is scheduled for September. We will have another update on our progress at Midyear and anticipate completion around then or shortly after
 - Kimberly Hull has volunteered to be Chair of this WG
 - Leadership Training – Marissa Kost, NC
 - WG needs to regroup to align with similar goal/task out of Strategic Affairs committee ; originally moving towards the path of using LinkedIn Learning to provide leadership training
 - Training Endorsement Policy & Tables – Marissa Kost, NC
 - WG has already approved endorsement policy tables/documents; still finalizing template for budget (virtual training requests) once we receive final ISOT budget for comparison
 - DigitalChalk Usage
 - Kate Nelson (CT) has volunteered to be a part of this WG; still seeking more members though

Action Item Table

Responsible	Item	Action	Timing / Status
Marissa Kost (Chair)	Midyear/Annual Sub-Committee	Establish sub-committee with additional members	Midyear 2023
Training Curriculum Update WG	Align new AFRPS revisions with course curriculum	Update 2018 Course Curriculum document	Midyear 2023-update Annual 2023-final
Leadership Training WG	Regroup WG	Revise charge to align w/ Strategic Affairs goal/task; identify work already done & compile	Midyear 2023-update Annual 2023-update ~Fall 2023-final
Training Endorsement Policy WG	Finalize all documents for review for OP	Finalize budget docs for virtual/online training	Midyear 2023
DigitalChalk Usage WG	Begin WG	Recruit members, develop WG charge, schedule meetings	Midyear 2023-update

Minutes approved 10/10/2022. 12 voting in the affirmative.

Feed and Feed Ingredient Manufacturing Committee Report

2022 AAFCO Annual Meeting
August 5, 8:00–9:30 am, St. Louis, Missouri

Committee Recommendations: None

Board Recommendations: None

Committee Action Items

1. Mineral Guidelines Working Group: Revise the “Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients.”
2. FSMA Implementation Task Force – Working Group 3
Create action plan to determine the processes of implementing the decision making and method development.
3. Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections:
Perform gap analysis of FSPCA training for inspectors to determine if AAFCO needs to provide additional training for state inspectors.

Committee Participants

Members Present: Austin Therrell – SC (Co-Chair); Eric Brady – TN (Co-Chair); Ken Bowers – KS; Ben Jones – TX; Shaness Thomas – FL; Laura Scott – CFIA; George Ferguson – NC; Dr. Jonathon Roberts – LA; Jessica Gore – NC; Trish Dunn – IN; Charlie Hubenka – NE, Ashlee-Rose Ferguson, WA

Via Telephone: None

Advisors Present: Pat Tovey – PFI; Amanda Anderson – PFI; David Meeker – National Renderers Association; Louise Calderwood – AFIA; David Fairfield – NGFA; Linda Morrison – LIFE; James Emerson – US Poultry Association; Dan Frank – AFIA; Kathy Alinovi – NGPMA

Committee Report

Eric Brady called the meeting to order at 8:00 am. Members and advisors in the room introduced themselves.

Introductions and Agenda Review, Eric Brady

NEW MEMBERS: Charlie Hubenka, Trish Dunn, Jessica Gore

Review of Action Items

Mineral Guidelines Working Group – Therrell

Austin – Approved during business meeting of Annual Meeting in August 2022.

FSMA IMPLEMENTATION TASK FORCE UPDATES

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

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

Eric –Communication has been improved between the LMSC. Gap has been bridged by lab and regulatory. Gathering methods. Retooling of survey for more targeted response. Survey will be delivered after meeting. Expect report from survey results in San Antonio.

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

Working Group Charge: Review materials developed by FSPCA and FDA to determine whether training material for feed ingredient manufacturing from the FSPCA will meet the needs of Inspectors in regards to training. Working group will work in consultation with the Education & Training Committee and the Inspection & Sampling Committee.

Standardized Advanced Inspector Training, inspectors were provided good foundation. Ingredient Verification tool was demonstrated for inspectors. Real life scenarios were utilized for veteran inspectors. Gained positive response. Skillsets are being built.

Therrell – Austin developed documents for breakout sessions. Successful demonstration. Seeking input from states that are using this in the field.

Brady – Thank you Austin for providing subject matter experts to the training.

Canadian Food Inspection Agency Update - Laura Scott

See Appendix 1.

Other Business: Nutrient Contaminant Workgroup

Multiple meetings have been held. Provide links to other resources and make easily accessible repository of information. Went through species by species. We have to figure out the best display mechanism. We are waiting on technology pieces.

Tovey – scope and focus concerns. Identified good resources. Should we reproduce the results we found? List the resources? Recommend strong communication plan. Start conversation.

Louise – Took a little over an hour to find resources to complete assignment. If I worked for a state I would have access to state vet or extension. Question need for exercise.

Therrell – we will decide direction.

Consideration to review the voluntary self-inspection program in Section 5 of the OP.

Therrell – VSIP working group recommended to MBRC to remove section.

Tasked with review of National Medicated Feed Program section pg 263 of the OP. Outside of scope.

Therrell Motion to form workgroup to review. Bowers Seconds. Motion Carries.

Workgroup: Ben Jones, Eric Brady, Jonathon Roberts, Dave Fairfield

New Business

George Ferguson – IPPE Atlanta, Visit IPPE. More courses for LMS system.

AFIA has courses.

What is available for on time training...videos.

Kansas State has incredible wealth of information.

Advantages of equipment review training.

FFIM work with ETC – Develop training. Request funding. Create workgroup.

Brady – Motion to create workgroup to develop on-time training material of feed manufacturing equipment. Bowers Seconds. Motion Carries.

Meeker comments on some material available.

Therrell realizes materials expensive.

Fairfield – what would it be used for? What happens next?

Therrell – Starting training process. Significant amount of time on training new inspectors, before training on regulations begins. Resource for utilizing time management on how facilities operate.

Fairfield – Evaluate programs and processes.

Leah – Where do you start? Very complex topic. Lots of video available. How to bridge that gap for understanding. Have AAFCO meeting in Atlanta.

Ferguson- Thank you Leah. Pick one topic and see how it goes. Intended to make inspectors comfortable. We don't expect things to be free. Get inspectors understanding of equipment before they walk in.

Action Items

Responsible	Item	Action	Timing / Status
Mineral Guidelines Working Group	Mineral Guidelines	To review and revise the "Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients". Working Group: Bill Burkholder (lead)	Approved
FSMA Implementation Task Force-Working Group 3	Hazard & Contaminant Action Levels and Enforcement Strategies	Work with FSPCA, EIC, ISC, IDC and LMSC to develop a prioritized list of method development once list of contaminants and hazards has been identified by the FSPCA and FDA. A plan of action should be created by the working group to determine the processes of implementing the decision making and method development.	Update: January 2023
FSMA Implementation Task Force-Working Group 4	Inspector Training Development	Gap Analysis performed on FSCPA training to determine if there is any missing education that should be provided to inspectors whom perform feed ingredient manufacturing inspections	Update: January 2023

Meeting Adjourned.

Appendix 1: AAFCO Canada Update, August 2022

Laura Scott, Canadian Food Inspection Agency

1) Canadian Feed Regulations update

The CFIA published proposed new feed regulations for consultation from June-October of 2021 in the Canada Gazette (the Canadian version of the federal register). CFIA received approximately 80 sets of comments on the proposal. The comments are available online on the Gazette website. CFIA has been reviewing the comments and adjusting the regulatory text as needed. A “what we heard report” will also be published to summarize the feedback received and to address many of the comments.

It is anticipated that the new regulations will be published in the first half of 2023.

Once published, the new rules will come into effect. There will be staggered coming in to force to help provide time for people to get ready. Any of the new provisions with respect to registration and labelling flexibilities will come into effect right away. In addition, the labelling provisions will have a 1 year transition period where either the old or new rules can be followed. The new requirements for preventive control plans will not come into effect until 1 year after that final publication, and then licensing will come into effect 6 months after that.

CFIA will be providing guidance and information sessions closer to the time of publication and coming into force.

Consultation and comments: [Canada Gazette, Part 1, Volume 155, Number 24:](#)

Guidance from the consultation: [Feed regulatory modernization - Canadian Food Inspection Agency \(canada.ca\)](#)

2) Guidance updates

Gut modifiers: CFIA has launched a consultation on guidance for registration requirements for gut modifier products. Gut modifiers as livestock feed are products that, once fed, have a mode of action in the gastrointestinal (GI) tract of an animal. They achieve this by acting on the feed itself while in the gut or by modifying the GI environment to provide a benefit to the animal as may be linked to a nutritional effect. These products require registration before they can be sold in Canada. The consultation is available on the CFIA website and comments and feedback are welcome until September 19, 2022.

Gut modifier consultation: [Share your thoughts: Consultation on registration requirements for gut modifier products - Canadian Food Inspection Agency \(canada.ca\)](#)

Veterinary Health Products – CFIA launched a pilot project to allow some veterinary health products (VHPs) to be used in livestock feeds. In April 2022 the guidance was updated to also allow these VHPs to be used in feeds that contain a medication. CFIA continues to work with colleagues at Health Canada in preparation for the new feed regulations which will allow all VHPs to be allowed to be used in livestock feeds.

Veterinary health products guidance: [Veterinary health products for use in livestock feeds: guidance for feed manufacturers - Canadian Food Inspection Agency \(canada.ca\)](#)

Permissible Claims – CFIA has published guidance on permissible claims for use on feed labels. This guidance provides information on which claims are allowed to be used on feed labels without the need to register the feed. At this time, it is limited to claims related to method of production, such as “this feed is suitable for use as part of the raised without the use of antibiotics program”. The guidance also provides clarity on the use of certain statements on feed labels such as “HACCP certified”.

Permissible Claims guidance: [4.12 - RG-1 Regulatory Guidance: Chapter 4 - Labelling and guarantees - Animal health - Canadian Food Inspection Agency \(canada.ca\)](#)

3) Electronic submissions

CFIA is excited to announce that we’ve launched our new online portal for registrations - MyCFIA. Companies are encouraged to create a profile and submit their registration applications online. The existing guidance on how to apply for feed registration has been updated to include information on how to use MyCFIA. This portal and electronic submissions is a great step forward and brings some great new features.

How to register a feed: [1.3 - RG-1 Regulatory Guidance: Chapter 1 – Administrative Requirements for Pre-market Assessment and Product Registration of Livestock Feed - Animal health - Canadian Food Inspection Agency \(canada.ca\)](#)

MyCFIA: [My CFIA - Canadian Food Inspection Agency \(canada.ca\)](#)

Feed Labeling Committee Report
2022 AAFCO Annual Meeting
August 5, 8:45–9:30 am (CDT), St. Louis, Missouri

Committee Recommendations: None

Board Recommendations: None

Committee Participants

Members Present: David Dressler (PA), Chris Berg (IA), Erin Bubb (PA), Liz Beckman (WA), George Ferguson (NC), Stevie Glaspie (MI), Jamie Spencer (KS), Jordan Mancini (MN), Jamie Good (ND), Adam Orr (FDA), Justin Hill (NC).

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

Absent: Mark Ashcroft (UT), Dragan Momcilovic (FDA), Kelli Younker (NM), Tom Phillips (MD), Bailey Whiten (GA), Lisa Fantelli (VT), Ashley Shaw (FDA), Angie Simmons (GA), Julia Fidenzio (APPA), Roger Hoestenbach (APPA), Kevin Ragland (PFI), Steve Younker (AFIA).

Committee Report

The meeting was called to order by David Dressler at 9:00 AM CDT. Roll call of members and advisors was taken, with a quorum established (11 of 19). Due to time constraints, topics on the agenda were moved around.

Labeling of Products Containing Microorganisms

- Office of the Indiana State Chemists submitted a proposal to the committee suggesting guarantees for microorganism be broken out into families, versus having all microorganism guarantees lumped together under Total Microorganisms.
- Dancia Wu with the Office of Indiana State Chemist provided a presentation about the research she was involved with regarding this topic. In her presentation, Dancia mentioned laboratory methods are not able to enumerate all microorganisms, and some groups of microorganisms failed testing even though the label would be compliant due to the total microorganism guarantee. Dancia further explained that a separate guarantee for groups of microorganisms would help regulatory programs determine which groups failed guarantees, assist in identifying which groups would have greater stability, and provide better information to the consumers.
- Discussion after the presentation involved questions, such as how the proposal would control the problem, how would this be beneficial to the consumer, and what the global impacts of this change would be. Methods chosen in the study were over 20 years old and analytical variations about what passed and what failed were determined in-house.
- The committee recommended a workgroup be formed to further look into this topic.
 - o MOTION: Jordan Mancini moves to form a workgroup to look into microorganism guarantees further. Chris Berg seconds. MOTION PASSES.
 - o David Dressler stated that solicitation of workgroup members will be done via email at a later date.

Unique Identifiers (i.e. Lot Numbers) on Feed Labeling

- Due to the shortness of time for the committee meeting, the workgroup's update was tabled until the Mid-Year meeting in January 2023.

OP Edits Workgroup Update

- This workgroup has not met since the Mid-Year meeting in January 2022. An update is expected at the Mid-Year meeting January 2023.

Meeting adjourned at 9:40 AM CDT

Action Item Table

Responsible	Item	Action	Timing / Status
David Dressler	Guarantees for Microorganisms Workgroup	Form workgroup to discuss the microorganism guarantees topic and provide a report/recommendation back to the committee	September 2022

Responsible	Item	Action	Timing / Status
David Dressler	Guarantees for Microorganisms Workgroup	Provide update/recommendation to Committee	2023 Mid-Year Meeting
David Dressler	OP Updates	Reconvene workgroup to review FLC's sections of the OP and determine if any areas need edited	October 2022
Chris Berg	Lot Identifier Work Group	Provide update/recommendation to Committee	2023 Mid-Year Meeting

Ingredient Definitions Committee Report, August 4, 2022

2022 AAFCO Annual Meeting
August 4, 3:30–5:00 pm (CDT), St. Louis, Missouri

Recommendations to the Board and Association Membership

Common Food Language is in Appendix A. OP text is presented in Appendix B.

- 1) Publish the CFI procedures in the OP at page 338.
- 2) Publish the CFI worksheet on the AAFCO website (set up new portal).
- 3) Replace the existing CFI policy on OP page 337 with the one in Appendix A.
- 4) Publish a New Official Definition **30.01 Fumonisin Esterase**.
- 5) Publish an amended **33.16 Methyl Esters of Conjugated Linoleic Acid** to reflect the CFR amendment.
- 6) Publish a New tentative definition for **T36.11(a)**, to add *Lentilactobacillus hilgardii*.
- 7) Publish as **T42.25 Grain Sorghum Protein Feed**. Remove "Grain Sorghum Gluten feed" in the 2025 Official Publication.
- 8) Publish as **T42.35 Grain Sorghum Protein Meal**. Remove "Grain Sorghum Gluten meal" in the 2025 Official Publication.
- 9) Publish an editorial change to **48.18 Hydrolyzed Corn Protein**, ~~Gluten~~ **Protein** language is in Appendix B
- 10) Publish as **T48.135 Corn Protein Feed**. Remove "corn Gluten feed" in the 2025 Official Publication.
- 11) Publish a new tentative definition **T48.145 Corn Protein Meal**. The intention is to remove 48.14 Corn Gluten Meal from industry use by 2025.
- 12) Publish a new tentative definition for **T71.41 Low Glucosinolate High Erucic Acid Rapeseed Meal, Mechanically Extracted****
- 13) Publish a new tentative definition for **T73.200 Xanthan Gum** in section 73, Technical Additives, in the AAFCO Official Publication to allow its use as a suspending agent in plant inoculant products.
- 14) Publish an Addition to table 101.1 AGRN44 **Endo-1.4-Beta xylanase enzyme**
- 15) Publish an Addition to table 101 AGRN 48 **Dried L-Valine Fermentation**
- 16) Make the following changes in ODI: (tentative ingredients do not go into ODI) **

IDC Meeting Date: 8/4/22

ODI Summary of Changes for OP

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 Action

To be considered in October 2022

Association Action

To be considered in January 2023

Recommendations Not Needing Further Association Review

- 1) Schedule an ODI training for investigators.
- 2) Dan King and FASS to do close search of Gluten changes to collective terms and other OP areas including labeling examples in OP.

Referrals to Other AAFCO Committees: None

Minutes IDC August 4, 2022

The Committee met in person and virtually with over 400 attendees. Committee member roll call on Google Doc was Displayed. A quorum was present with 22 out of 26 voting members present including Richard Ten Eyck, Laura Scott, Austin Therrell, Charlotte Conway (FDA), Ken Bowers, Erin Bubb, Stan Cook, Dave Dressler, James Embry, Maggie Faba, Ashlee-Rose Ferguson, Jacob Fleig, George Ferguson, Falina Hutchinson, Darrell Johnson, Ali Kashani, Alan Keller, Dan King, Dave Phillips, Tom Phillips, Nathan Price, David Snell, Ashley Shaw (FDA) (no Vote), Absent: Mark LeBlanc, Cory Skier, Kimberly Truett, Kelli Younker, Jennifer Kormos CAN (no vote), Shannon Jordre (FDA) (no vote),

Regulators were asked if anyone would like to join the committee.

There were some minor edits

OP Content

- 1) Common Food Index Procedures – Erin Bubb The CFI index procedures were displayed. Bubb moved to publish the common food index procedures (displayed) in chapter 5 of the OP next to the CFI guidelines. George seconds. PFI asked what happens if a substance is rejected from the index. Bubb responded that a rejection only indicates the substance does not meet the definition of common food. The subcommittee would include a recommendation of how the substance should pursue recognition. Motion passed with no objections or abstentions.
- 2) Bubb moved to the displayed worksheet to be published on the AAFCO.org website after membership acceptance of the procedures. George Ferguson seconded. Motion passed unanimously.
- 3) Bubb moved replace the current policy guidelines with the ones displayed on the screen. George seconds. Motion passes unanimously.
- 4) 48.14 Corn Gluten Meal new tentative definition– Dan King moved to Publish a new tentative definition T48.145 Corn Protein Meal. Remove “corn Gluten meal “ in the 2025 Official Publication. Jacob Fleig seconded, In 2025 48.14 Corn Gluten Meal would also be removed from the OP. Industry was supportive of the changes. “name amended 2023” Need to also edit collective terms and label examples and labeling guides after this goes official. Give task to Dan King and FASS.
- 5) **Definition Number: 42.145 Name: Corn Protein Meal**

(Text/Description - attach additional page if necessary)

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.

The ingredient ‘Corn Gluten Meal’ does not contain gluten and the investigator recommends defining the ingredient using the term ‘protein’ in lieu of ‘gluten’.

- 6) 48.18 Hydrolyzed Corn Protein - editorial change to terminology. ~~Gluten~~ **Protein** (5 min) Dan King Tom Phillips seconds

- 7) Action: ☐ New Tentative Definition
☐ Tentative Definition to be made Official
☒ Editorial Change
☐ Delete Official Definition
☐ Other: _____

Definition Number: 48.18 Name: Hydrolyzed Corn Protein

(Text/Description - attach additional page if necessary)

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)

- 8) 48.13 Corn Gluten Feed new tentative definition - Dan King (5 min) Publish as T48.135 Corn Protein Feed. Remove "corn Gluten feed" in the 2025 Official Publication. Dan moved, Jacob seconds. Industry indicated that trade agreements need to be modified to accommodate this change. They are supportive of the name change but may need more time to implement it. Motion passed unanimously.
- 9) 42.2 Grain Sorghum Gluten Feed new tentative definition - Dan King (5 min) Publish as T42.25 *Grain Sorghum Protein Feed*. Remove "Grain Sorghum Gluten feed" in the 2025 Official Publication. Dan moved, Jacob seconds
 Sorghum producers industry is supportive of the change. Motion passes unanimously
 Definition Number: 42.25 Name: Grain Sorghum Protein Feed

(Text/Description - attach additional page if necessary)

T42.25 Grain Sorghum Gluten Feed(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 "Grain Sorghum Gluten Feed" in the 2025 Official Publication. (Adopted 19XX, Amended 19XX)

- 10) 42.3 Grain Sorghum Gluten Meal new tentative definition - Dan King (5 min) Publish as **T42.35 Grain Sorghum Protein Meal**. Remove "Grain Sorghum Gluten meal" in the 2025 Official Publication. Dan Moves, Jacobs seconds. Motion passes unanimously
- 11) 33.16 Publish an edit of the 33.16 Official Definition (CFR 573.637 MECLA) for Methyl Esters of Conjugated Linoleic Acid – Bernadette Mundo moves to Publish an amended **33.16 Methyl Esters of Conjugated Linoleic Acid** to reflect the CFR amendment. Seconded by Erin Bubbs Item should go through Board and membership. Motion passed unanimously.
- 12) Publish a New tentative definition for T36.11(a), to add *Lentilactobacillus hilgardii* -(10 min) Maggie Faba moves, George Ferguson Seconds Motion passes unanimously
<https://aafco.mocaworks.com/viewer/?eID=2071444>
- 13) Publish a new tentative definition for **T73.200 Xanthan Gum** in section 73, Technical Additives, in the AAFCO Official Publication to allow its use as a suspending agent in plant inoculant products. T73.200 Erin Bubbs Moves, George Ferguson Seconds. Current definition to remain in place. Motion passes unanimously Richard Ten Eyck
- 14) CVM Placeholder #1 for FAP if Published. Publish a New Official Definition **30.01 Fumonisin Esterase** - George Ferguson moves, Stan Seconds. Motion passes unanimously
- 15) CVM Placeholder #2 (10 min) Publish a New tentative definition for **T71.41 Low Glucosinolate High Erucic Acid Rapeseed Meal, Mechanically Extracted**** - Falina moves, Erin Bubbs seconds. The micromoles units was discussed. It is used in other definitions. Motion passes unanimously.
- 16) Nathan Price moved to Add to table 101.1 AGRN44 Endo-1.4-Beta xylanase enzyme George Ferguson Seconded. Motion passes unanimously.
- 17) Nathan Price moved to Add to table 101 AGRN 48 Dried L-Valine Fermentation Product George Ferguson seconded. Motion passes unanimously.

ODI Maintenance

- 18) ODI Subcommittee report – Jacob Fleig Reported Richard and Jacob have been working on the process of building an excel file of ODI changes.
- 19) ODI procedures – Jacob Fleig Report: The procedures are in the BIN and are ready for the investigators to pilot. Jacob moved to conduct a training with investigators on this draft ODI procedure. George Ferguson seconded. Discussion was held on the process flow for adding or deleting references. Motion passed unanimously. *Chair will schedule the training.*
- 20) Marine Products ODI placeholder Michael Blume (5 min) (not addressed)

Informational Updates

- 21) Swine Health work group update - Erin Bubb
 - a) Charge for Swine Health work group:
 Examine the chapter 6 sections to determine if Swine Health Protection Act should be referenced and if so, develop the appropriate language to include in those section headers. So far the WG consists of George Ferguson, Shannon Jordre, Tom Phillips, Erin Bubb, Kristi Smedley, Leah Wilkinson, Dave Meeker, James Emmerson.
Erin Bubb reported the work group has met 4 times and determined there are ingredients that need to follow the Federal Swine Health Protection Act prior to being fed to swine. Sections 40 and 60 should be looked at first. The workgroup has some model guidelines for the committee to review at the next IDC meeting.
- 22) Workgroup report on sunseting (withdrawing) procedures for common or usual names in the OP. – (need a new lead) The scope of this workgroup will be expanded to include how to change a common or usual name. Workgroup members currently include Leah Wilkinson AFIA, PFI, Kristi Smedley, Jean Hofve, NGFA Dave Fairfield, US Poultry James Emmerson, Ken Bowers, Dave Edwards and Maggie Faba. – **New lead needed** *Ken Bowers reported that the group has not met. There is policy information drafted in the BIN. Hanging questions include where this gets published and how does this impact direct fed microbials.*
Add to the existing policy:

When the revision includes the modification or change in the ingredient name, the old name should be “sunsetting” which provides time for the old name to expire and the transition to use of the new name. The date should be printed at the end of any ingredient that would need to be sunsetted in a bold parenthetical so that the section editor can easily identify anything that needs to be deleted in their annual review. The date should typically be 2-3 years unless some situation warrants a longer sunset period.
- 23) Human Grade feed term edits accepted by IDC in January 2021 are being held until the human grade guidelines are passed out of model bill committee. *The feed term was accepted by membership this morning and will be in the 2023 OP.*
- 24) Animal Products Section updates, collagen etc. (15 min) Stan Cook Not dealt with today, schedule
- 25) Update on the ingredient submission workshop modules – *Nathan Price reported that final narration was sent to instructional design on Tuesday. Modules should be in the LMS by the end of August. Looking for volunteers for the workshop in January 2023. AFIA, Kristy Smedley and CVM volunteered. Erin Bubb is the point of contact for IDC.*
- 26) Hemp Update – Falina Hutchinson, MT Webinar scheduled: [Hemp as a Feed Ingredient; A National Discussion](#) 8/9/22 Noon Eastern
Falina Hutchinson Reported Hemp seed meal was submitted to FDA in January 2021 for review as a definition. FDA asked the submitter questions. Hemp Seed Coalition answered. FDA recently asked additional questions.
Erin Bubb reported that over 800 people have registered for the National Discussion on Hemp. Hemp Seed Coalition representative indicated frustration on the timelines for FDA review and the depth of questions. They desire clear guidelines from FDA to reduce the back and forth. Falina is aware of the conversations. Chair verified that communications channels are open between the investigator, CVM and the firm.
No one is working on defining Hemp Oil for animal food.
- 27) Training Proposals (10 min) - Richard Ten Eyck (not addressed this meeting)
 - a) **From ETC** training on feed ingredients is desired, topics: new by-products, additives (CFR regulations, selenium), Refuse regulations

- i) Work group charge: Working with ETC, industry SME's and an educational designer develop online Educational modules on by-product ingredients role in sustainability.
Lead: ____ ETC ____ group:
- ii) Learning Objectives
 - (1) Become familiar with the benefits of the particular products
 - (2) Become familiar with the hazards needing to mitigate in producing the ingredient
 - (3) Become familiar with the appropriate labeling of the ingredient
- iii) Budget and Benchmarks
 - (1) Multi year? Placeholder on 2022–23 budget needs request filled out
- iv) Ingredients to Start On
 - Feed ingredients encouraging sustainability (6 modules) (prioritize?)
 - Rendering (Beef, Pork, Poultry, Broth)
 - Oil Seeds (Soybeans, Hemp, Canola, Camelina)
 - Packaged Food Reclamation (Bakery, Grocery Warehouse)
 - Food Processing Reclamation (Vegetable, Animal)
 - Insect Farming (BSFL, Cricket)
 - Algae for food and Feed (micro, Macro)

28) Adjourn 5:10 pm CST

Minutes approved 9/16/22 by voice vote on zoom meeting.

Announcements

- A. Next Meetings: Online, September 16, 2022
- B. New Investigators:
 - a. Feed Terms – Ali Kashani
- C. **Stale Ingredients:** The following are being removed from consideration as definition requests. Please submit a new request if still desired.
 - a. -none-
- D. Parking Lot topics:
 - a. ~~Facilitate a round table discussion on the use of hemp in animal food.~~
 - b. ICG workgroup report – not met since June 2021 -
 - c. NANP Subcommittee report –have not met -Ashley Shaw /Casey/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.*
 - e. Pursue formal MSBC Definition.
 - f. New feed term Total Ration.
 - g. New feed term Freeze-Dried.
 - h. Establish a feed term for “Finished Feed”
 - i. Fluorine levels in model bill 975.08 AOAC method (need details)
 - j. ~~Clean up Chapter 5 CFI guidelines~~
 - k. Particular processed/pomace vs common foods -TBD
 - l. Use of definition request tracking sheet – CVM (15 min)
 - m. Presentation on Algae use in feed – ABO, Rebecca White

Appendix A

Common Food Index Guidelines & Questions were accepted by IDC 8/4/22.

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

- I. 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”
- II. 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.
- III. 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
- IV. 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
- V. 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.
- VI. 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.
- VII. 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
 - i. Subcommittee decision to not accept for public review
 - ii. IDC decision to accept or not to accept an item for inclusion in the CFI
 - iii. IDC decision to remove an item from the CFI
 - c. An appeal can be submitted by emailing 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.

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 (bold-italic) or Red (bold) 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?

Replace current guideline at OP page 337 with this language.

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.

Appendix B

30.01 Fumonisin esterase

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

- (a) 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.
- (b) The additive shall meet the following specifications:
 - (1) The fermentation media for the *Komagataella phaffii* shall not contain methanol.
 - (2) Viable genetically engineered *Komagataella phaffii* shall not be present.
 - (3) 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.
- (c) The additive is incorporated at a minimum of 15 units of fumonisin esterase activity per kilogram of complete swine feed that cannot contain more than 10 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)

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)

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~~

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)

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

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)

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)

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.

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.

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**)

Add to Table 101.1:

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
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)

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, 1,119 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)

Appendix C: ODI Updates 8/4/22

IDC Meeting Date: 8/4/22

ODI Summary of Changes for OP

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

Ingredient Definitions Committee Report, September 16, 2022

Virtual Meeting

September 16, 2022, 11:30 am–2:30 pm (EDT)

Accepted by IDC on November 2, 2022

Recommendations to the Board and Association Membership

OP Text is in Appendix A. ODI changes in Appendix B. Swine Health workgroup report in Appendix C. Sunseting Workgroup report is in Appendix D.

- 1) Publish changes to the feed term “Gluten”. “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.”
- 2) Publish the tentative T12.8 Barley Protein Concentrate as official (page 377), **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 hulless 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)
- 3) Publish an update to table 101.1 to include AGRN 42. Text is in Appendix A.
- 4) Publish a replacement Official Definition **30.01 Fumonisin Esterase**. *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. Text is in Appendix A.*
- 5) Add the following statement to the header (preamble) of chapters 40 and 60 (page 411 and page 440): **“*** 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)”**
- 6) 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
- 7) Make the following changes in ODI: (tentative ingredients do not go into ODI) ** -none-
**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 Action

To be considered in November 2022

Association Action

To be considered in January 2023

Recommendations Not Needing Further Association Review

- 1) Schedule an ODI training for investigators.
- 2) Dan King and FASS to do close search of Gluten changes to collective terms and other OP areas including labeling examples in OP.

Referrals to Other AAFCO Committees

Discussion with ETC on Ingredient education presentations. – Discussion with meeting planning workgroup on meeting agenda placement for ingredient education talks.

(draft charge) Standing up a workgroup to look at the impact and differences in ingredient definitions and laboratory testing methods for fluoride and fluorine. Workgroup to consist of Tom Phillips (lab) and

Jennifer Kormos (IDC) and Ken Bowers (FIFM). Be sure to look at model bill language. Make recommendations to the appropriate committees.

Minutes IDC September 16, 2022

The Committee met virtually with over 150 attendees. Committee member roll call on Google Doc was Displayed. A quorum was present with 20 out of 26 voting members present including Erin Bubb, Richard Ten Eyck, Laura Scott, Charlotte Conway (FDA), Ken Bowers, Eric Brady, Stan Cook, Dave Dressler, Maggie Faba, Ashlee-Rose Ferguson, Jacob Fleig, George Ferguson, Ali Kashani, Alan Keller, Dan King, Mark LeBlanc, Tom Phillips, Nathan Price, Cory Skier, David Snell, Absent: James Embry, Falina Hutchinson, Darrell Johnson, Dave Phillips, Kimberly Truett, Kelli Younker, Jennifer Kormos CAN (no vote), Shannon Jordre (FDA) (no vote), Ashley Shaw (FDA) (no Vote), Erin Bubb, Co-Chair opened the meeting about 11:35 EST and conducted meeting.

OP Content

- 1) Approve August minutes. Stan Cook moved to accept the displayed August 8/4/22 IDC meeting minutes. Richard Ten Eyck seconded. – No corrections were offered. Motion Passed unanimously.
- 2) Gluten Feed Term. Ali Kashani moved to revise the feed term “gluten” and publish in the OP, Ken Bowers seconds. Discussion was held to refine the language. The committee finally arrived at: “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.” Motion Passed unanimously.
- 3) ~~“Finished Feed” Term (10) Ali Kashani (discuss in January)~~
- 4) Barley Protein Concentrate to Official. T12.8 Dan King moves, Stan cook Seconds “T12.8 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)”
- 5) Add to table 101.1 AGRN 42 Charlotte Conway moves to add AGRN 42 to Table 101.1. Ken Bowers Seconds. Committee had no questions.

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	<i>Butyrivibrio fibrisolvens</i> Dried <i>Butyrivibrio fibrisolvens</i> Fermentation Product	Utility information not evaluated for GRAS, see FDA's letter for more information	Dairy cattle	2/12/21	FDA has no questions. (PDF, 3 pages)

Communication with investigator and CVM while editing minutes: “In GRAS notice 42, which was recently passed through the AAFCO Ingredient Definitions Committee, we had the first viable microbe for animal food that received a ‘no questions’ letter from us. In looking deeper into the common or usual name for this one and much discussion here at CVM, we think the common or usual name should be “Dried *Butyrivibrio fibrisolvens* Fermentation Product” to follow the naming convention for the Direct-Fed Microbials listed in the OP. A product label would have viable microbe guarantees which would indicate that this is a viable product. We are also pretty sure the firm would want to put on the label that this is viable.” Motion passes unanimously.

- 6) CVM placeholder #1 **30.01 Fumonisin Esterase** (to add poultry) Richard Ten Eyck moves to Publish as a replacement for the 30.01 IDC passed in August. Stan Cook Seconded. Definition to come into the OP as official (Food Additive Regulation). Motion passes unanimously.

“30.01 Fumonisin esterase

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

- (a) 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.
 - (b) The additive shall meet the following specifications:
 - (1) The fermentation media for the *Komagataella phaffii* shall not contain methanol.
 - (2) Viable genetically engineered *Komagataella phaffii* shall not be present.
 - (3) 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.
 - (c) The additive is incorporated at a minimum of 15 units of fumonisin esterase activity per kilogram of complete swine feed that cannot contain more than 10 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)
- 7) ~~CVM placeholder #2 (10)~~ no topic was advanced.
 - 8) Swine Health Protection Act guidance for animal feed ingredients
Swine Health work group update - Erin Bubb
 - a) Charge for Swine Health work group:
Examine the chapter 6 sections to determine if Swine Health Protection Act should be referenced and if so, develop the appropriate language to include in those section headers. WG consists of George Ferguson, Shannon Jordre, Tom Phillips, Erin Bubb, Kristi Smedley, Leah Wilkinson, Dave Meeker, James Emerson.
Erin Bubb gave a brief summary of the workgroup activity and conclusions.
Laura moved to accept the workgroup report. Ken Bowers seconds. There were no questions from the committee. Motion Approved
Workgroup report is attached as Appendix C.
 - 9) Erin Bubb Moved to publish the guideline language in the headers of sections forty and sixty of the OP (page 411 and page 440). Laura seconds.
 - Guidance language: "*** This ingredient may contain materials that fit the Swine Health Protection Act's definition of "garbage" (e.g. 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)"
- Motion passes unanimously.
- 10) Erin Bubb Moved to 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. Ali Kashani seconded the motion. The committee had

questions on BSFL inclusion. The larvae are grown on food waste that **might** contain meat. Other ingredients may be added later to this designation. Workgroup remains in place. Motion passes unanimously.

ODI Maintenance

Marine Products ODI placeholder Michael (5 min) no topic was advanced.

Informational Updates

- 11) Animal Protein Discussion -- Stan Cook: *Workgroup has submitted an amendment to MBM definition to CVM. They are also trying to develop a definition to cover multispecies MBM and some other topics. Save time on the January agenda.*
 - 12) Sunsetting workgroup report – Ken Bowers: Workgroup report on sunseting (withdrawing) procedures for common or usual names in the OP. – (need a new lead) The scope of this workgroup will be expanded to include how to change a common or usual name. Workgroup members currently include Leah Wilkinson AFIA, PFI, Kristi Smedley, Jean Hofve, NGFA Dave Fairfield, US Poultry James Emmerson, Ken Bowers, Dave Edwards and Maggie Faba. – *Workgroup has posted a report in the feed BIN on 8/31/22. **Put consideration on the January agenda.** Charlotte Conway is the new workgroup lead. Stan Cook moved to accept the workgroup report. Maggie Faba seconded. **Sunsetting report is in Appendix D***
 - 13) Ingredient submission modules – Meagan Davis. *The modules are being loaded into the LMS system. Coming soon is announcements on pricing and how to enroll.*
 - 14) ISW (Ingredient Submission Workshop) in Tx - progress report -- Meagan Davis. *Workshop date and pricing are still being set. (1/16/23 1:30 – 5:30 CST). Meagan recapped planned content. Looking for investigators to help present.*
 - 15) Hemp update – Charlotte Conway included [National](#) Discussion and OSU conference announcement. *Webinar went well and was well attended with over 1000 attendees registered. Call generated several new conversations. Charlotte Conway and Austin Therrell plan to attend the [OSU conference](#) on hemp in feed 10/26-27/2022.*
 - 16) CVM discussion of request tracking (placeholder) -- Charlotte Conway *Working to address the transparency of ingredients under review. Public meeting for all stakeholders is being planned for early 2023. A public listening session on [claims on animal food](#) is scheduled for October 18, 2022.*
 - 17) Review parking lot Richard Ten Eyck – *See notes below.*
 - 18) ~~ABO presentation (0) Rebecca White~~ ABO – push to January
 - 19) Training Proposals - Richard Ten Eyck
 - a) **From ETC** training on feed ingredients is desired, topics: new by-products, additives (CFR regulations, selenium), Refuse regulations
 - i) Work group charge: Working with ETC, industry SME's and an educational designer develop online Educational modules on by-product ingredients role in sustainability.
 - ii) Learning Objectives
 - (1) Become familiar with the benefits of the particular products
 - (2) Become familiar with the hazards needing to mitigate in producing the ingredient
 - (3) Become familiar with the appropriate labeling of the ingredient
 - iii) Budget and Benchmarks
 - (1) Multi year? Placeholder on 2022-23 budget needs request filled out
 - iv) Ingredients to Start On
Feed ingredients encouraging sustainability (6 modules) (prioritize?)
 - Rendering (Beef, Pork, Poultry, Broth)
 - Oil Seeds (Soybeans, Hemp, Canola, Camelina)
 - Packaged Food Reclamation (Bakery, Grocery Warehouse)
 - Food Processing Reclamation (Vegetable, Animal)
 - Insect Farming (BSFL, Cricket)
 - Algae for food and Feed (micro, Macro)
- Erin Bubb led a discussion on what AAFCO leadership desired on the topic. Surveys had indicated a desire to have more training on ingredients. The Committee weighed in on their perspective. At the end of the discussion the committee desires were voiced as to **provide a platform for educational talks provided by an ingredient industry at each face to face committee meeting.** Algae will be on the schedule for January.*

One trade association indicated there is a value chain behind the sustainability topic. Some of this may be business confidential business information (competitive advantage).

20) Adjourn 1:50 pm ish EST

Minutes approved 11/02/2022 16 in favor, 0 opposed

Members not voting: Laura Scott, Eric Brady, Charlotte Conway (FDA), Maggie Faba, George Ferguson, Alan Keller, Dan King, Mark LeBlanc, Cory Skier, David Snell, Falina Hutchinson, Dave Phillips, Kelli Younker

Announcements

- A. Next Meetings: Midyear, January 18?, 2023 TX Possible webinar with no votes on 11/18/22.
- B. New Investigators: (needed)
 - a. Technical additives
 - b. Special Purpose
 - c. Amino Acids
 - d. Enzymes
 - e. Marine Products
- C. **Stale Ingredients:** The following are being removed from consideration as definition requests. Please submit a new request if still desired.
 - a. -none-
- D. Parking Lot topics:
 - a. ~~Facilitate a round table discussion on the use of hemp in animal food. Webinar in August resolved this.~~
 - b. ICG workgroup report – not met since June 2021 - *OK to leave in Neutral*
 - c. NANP Subcommittee report –have not met -Ashley Shaw /Casey/AI -- *Still waiting on NRC staff*
 - 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. *Review in January*
 - e. Pursue formal MSBC Definition. *Nothing in motion.*
 - f. New feed term Total Ration. - Ali
 - g. New feed term Freeze-Dried. -Ali
 - h. Establish a feed term for “Finished Feed” – *Ali has workgroup*
 - i. Fluorine levels in model bill. 975.08 AOAC method for fluorine (need details) *Laura Scott gave an update. 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. 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 Fluorine vs fluoride.*
 - j. Particular processed/pomace vs common foods -*Stan and Pat Tovey. Looking for agenda time to present industry questions on feed term interpretations. January IDC will have a discussion on how to properly use feed terms. Industry desires a talk on Pomace at a future IDC meeting, include Ali Kashani and Dave Dressler.*
 - k. ~~Use of definition request tracking sheet – CVM (15 min)~~
 - l. Presentation on Algae use in feed – ABO, Rebecca White – *Doing in January*

ODI Maintenance

- 1) ODI Subcommittee report – Jacob Fleig Reported Richard and Jacob have been working on the process of building an excel file of ODI changes.
- 2) ODI procedures – Jacob Fleig Report: The procedures are in the BIN and are ready for the investigators to pilot. Jacob moved to conduct a training with investigators on this draft ODI procedure. George Ferguson seconded. Discussion was held on the process flow for adding or deleting references. Motion passed unanimously. *Chair will schedule the training.*

Appendix A: IDC 9/16/22 Minutes

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:

- (a) 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.
- (b) The additive shall meet the following specifications:
 - (1) The fermentation media for the *Komagataella phaffii* shall not contain methanol.
 - (2) Viable genetically engineered *Komagataella phaffii* shall not be present.
 - (3) 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.
- (c) The additive is incorporated at a minimum of 15 units of fumonisin esterase activity per kilogram of complete **swine** feed:
 - (1) **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)

Add to Table 101.1:

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
42 Part 1 (PDF, 307 pages) Part 2 (PDF, 307 pages)	Native Microbials, Inc.	<i>Butyrivibrio fibrisolvens</i> ASCUSDY19	Dried <i>Butyrivibrio fibrisolvens</i> Fermentation Product	Utility information not evaluated for GRAS, see FDA's letter for more information	Dairy cattle	2/12/21	FDA has no questions. (PDF, 3 pages)

Appendix B: ODI Updates 9/16/22 (none)

IDC Meeting Date: 9/16/22

ODI Summary of Changes for OP

Action	Ingredient Name	Reference	Comments (meeting)
None	None	None	None

Appendix C: Swine Health Workgroup Report to IDC 9/16/22

Food Waste Used in the Production of Animal Food

Food waste directed to the production of animal food:

- Must meet the most current requirements of the U.S. Department of Agriculture's (USDA) **Swine Health Protection Act**. The Swine Health Protection Act (SHPA) regulates food waste containing any meat or meat by-products fed to swine. Under this Act, the food waste containing the animal material is known as *garbage. Compliance with this act ensures that all food waste fed to swine is properly treated to kill disease organisms.

Garbage- as defined by the SHPA:

- "All waste material derived in whole or in part from the meat of any animal (including fish and poultry) or other animal material, and other refuse of any character whatsoever that has been associated with any such material, resulting from the handling, preparation, cooking or consumption of food, except that such term shall not include waste from ordinary household operations which is fed directly to swine on the same premises where such household is located" (per SHPA)
- Garbage definition is not necessarily intended to capture all animal products, (e.g., dairy). SHPA is intended to prevent diseases in swine through the consumption of untreated meat or meat by-products, from food waste streams.

IDC Work Group recommendation:

- Create a new guidance in the preambles for section 40, Human Food By-Products and section 60, Miscellaneous Products (these are the two sections that food waste materials containing meat or are comingled with food waste containing meat are likely to be listed)
- Guidance language: **“** 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)”**
- Does not exclude the ingredient from being fed to swine, but it must be treated (i.e. cooked) before feeding to swine.
- A decision tree (Appendix A) can be used by the IDC, AAFCO investigator, etc. to help determine if a feed ingredient should be designated with a symbol to reference the guidance in the preamble of that section.

Appendix D: Sunsetting Workgroup Report to IDC 9/16/22

(accepted by IDC no action taken)

2022 workgroup participants: Charlotte Conway, Leah Wilkinson, Kristi Smedley, Jean Hofve, Dave Fairfield, Dave Edwards, Maggie Faba, James Emerson, Pat Tovey, Carlos Gonzalez, Ken Bowers

After a call and further email discussion, the workgroup recommends the following:

Add to the existing edit/removal policy in the procedures manual:

When the revision includes a modification or change to the ingredient name, the old name should be removed through a sunsetting process which will provide time for the old name to expire and for transition to the new name to occur. The sunset date should be printed at the end of any ingredient that would need to be sunsetted in a bold parenthetical so that the section editor can easily identify any ingredient name that needs to be deleted in their annual review. The date should typically be 2 years unless the situation warrants a longer sunset period. A new ingredient number shall be assigned to the new name, and the date and action of change shall be noted in the parenthetical revision history [e.g., (proposed 1999, adopted 2000, name amended 2022)]. In the case of microorganism nomenclature changes, the new name shall be added after the old name. In definition 36.14, the new name will also need to be added on its own line if it is not currently listed. The old name will be deleted upon completion of the sunsetting period.

Inspection and Sampling Committee Report

2022 AAFCO Annual Meeting
August 5, 4:00–4:45 pm, St. Louis, Missouri

Committee Recommendations: None

Board Recommendations: None

Committee Action Items

- (1) Sampling Study Proposal Review Work Group Charge: Review proposals received to determine which candidate is the best fit to complete the study as outlined in the Request for Proposal. The group includes the following members: Miriam Johnson (ISC Liaison) – NC; Brett Groves – IN; Mark LeBlanc – LA; Steve Stewart – MN; Josh Arbaugh – WV; Louise Calderwood – AFIA
- (2) AITS & BITS Alignment Work Group Charge: Review current guidance document for hosting AITS & BITS and establish a consistent curriculum for future AITS seminars. Additionally this group has been charged with creating an inspection tool tailored to conducting PCAF inspections. The group includes the following members: Miriam Johnson (Lead) – NC; Jessica Gore – NC (POC for AITS); Chad Linton – WV; David Dressler – PA; Eric Brady – TN; Barb Schroeder – MN; Jamie Spencer – KS; Kevin Klommhaus – FDA; Stephanie Adams – AFIA.
 - a. 2022 AITS Cadre: Jessica Gore – NC (POC for AITS); Eric Brady – TN; Stevie Glaspie – MI; Jamie Spencer – KS; Jordan Mancini – MN; Miriam Johnson – NC
 - b. 2022 BITS Cadre: Miriam Johnson – NC (POC for BITS); Eric Brady – TN; Steve McMurry – KY; Matt Pearson – IN; Landen Kidd – UT; Chad Linton – WV
- (3) AAFCO Sponsored Sampling Equipment and Tools Work Group Charge: Research current companies available that can make sampling tools to AAFCO specifications, find prices, and the logistics of being able to sell to our members, and to report back to the committee at the next meeting. The group includes: Ethan Willis – MO; Jamie Spencer – KS; Daniel Zangari – CO; Dave Dressler – PA; A representative from KY to be announced. The final workgroup will be presented at the 2023 Midyear Meeting.
- (4) Bulk Feed Tote/Super Sack Sampling Method Development Work Group Charge: Research current scientific sampling methods available for bulk tote bags that could be adopted as an approved AAFCO feed sampling method. Additionally, the workgroup will determine if a sampling study to validate a proposed method is needed and begin the ground work for creating an RFP for conducting this sampling study. The group includes: Jamie Spencer – KS; Blythe Dunlap – MO; additional members of the workgroup will be requested from the committee via email. The final workgroup will be presented at the 2023 Midyear Meeting.
- (5) CIOC Webpage Updates Work Group Charge: To provide ISC webpage updates feedback to the Current Issues and Outreach Committee. The group includes: Caroline Wilkinson – VA (CIOC Liaison); Jessica Gore – NC; Daniel Zangari – CO

Committee Participants

Face to Face: Miriam Johnson (NC) – Chair; Chad Linton (WV)- Vice Chair; Austin Therrell, (SC) Board Liaison; Stan Cook (MO); Ethan Willis (MO); Jenny Combs (KY); Jacob Fleig (MO); Tim Lyons (MI); Jamie Spencer (KS); David Dressler (PA); Jessica Gore (NC); Daniel Zangari (CO); Jonathan Roberts (LA); Kevin Klommhaus (FDA)

Virtually: Barb Schroeder (MN); Jim True (KY); Samantha Moran-Defty (CA); Laura Scott (CFIA)

Advisors Present: Jan Campbell (NGFA), Chris Olinger (NGFA), Pat Tovey (PFI)

Other AAFCO Members Present: Alan Harrison, (KY)

Committee Report

Committee Chair, Miriam Johnson, called the meeting to order at 4:08 PM CST. 18 committee members and 4 industry liaisons were present via Face to Face, Zoom meeting room, and associated phone line connections.

Old Business

CIOC Webpage Updates Work Group Update – Miriam Johnson, NC

ISC was asked to review the current committee website content and provide comments back to CIOC regarding potential updates. ISC CIOC liaison Caroline Wilkinson will provide feedback to CIOC based on the review conducted by work group members Jessica Gore and Daniel Zangari. This feedback has a deadline of August 30, 2022.

AITS Seminar Review – Jessica Gore, NC

Jessica Gore gave an update for the 2022 Advanced Inspector Training Seminar (AITS) held in Omaha, Nebraska on June 28-30, 2022. The training had 46 total participants, 40 state representatives from 20 states and 6 representatives from FDA. All participants were active and collaborated well, the presentations and course materials were well received, and great ideas were exchanged amongst the entire group. CLEAR was the active presenter on the third day of training with positive reviews received from the class about the developed modules presented.

BITS Seminar Review – Miriam Johnson, NC

Miriam Johnson stated that the 2022 Basic Inspectors Training Seminar (BITS) will be held in Oklahoma City, OK, September 19 – 23, 2022. The teaching cadre is currently working to update presentations, OK has the necessary logistics arranged for lodging and transportation, and the link to registration is available. Advertisements will be sent out following this committee meeting.

Miriam Johnson has received correspondence from CO, ID, TN, and CA about interest in hosting both AITS and BITS courses. A two-year budget plan will be created for the 2023 and 2024 trainings and submitted to the BOD for approval. Once approved dates can be confirmed, logistics can begin being arranged.

New Business

Four State Training and Collaboration Update – Stan Cook, MO

Stan Cook discussed a regional meeting and training that was conducted between four states: Kansas, Nebraska, Missouri, and Iowa. 34 total participants at varying experience levels were in attendance. The group visited 2 facilities (1 large feed mill and 1 small feed mill) that allowed them to conduct inspections. The inspection groups compared their findings. It was noted that each participating state was consistent in finding the same deficiencies while conducting similar inspection activities to document their findings. The inspections concentrated on feed ingredients and labeling, inspection preparation and past inspections, and report writing. This also allowed the participants to meet others in different states and compare notes. This training was FDA funded through grants. Jamie Spencer additionally commented that the facilities feedback with the trainings was also well received, as the firms had questions for the inspectors associated with food safety plans. FDA was included with this training and gave several presentations. Jan Campbell stated that industry is excited and glad that all inspections were being conducted uniformly, this indicates training is consistent amongst state and federal inspectors, and she hopes that other states would be willing to do the same in their regions.

AAFCO Sponsored Sampling Equipment and Tools Workgroup Proposal – Austin Therrell, SC

Austin Therrell proposed the committee research the potential for facilitating AAFCO Branded sampling tools and equipment. He felt that states have the need for equipment and having AAFCO Branded tools would allow states to have the same equipment for consistent sampling amongst the states. Chad Linton stated that in the past the committee had trouble finding a shop that could produce the sampling tools required, and noted the logistics of sending the tools to states verses storage or carrying of overhead. The costs associated with these is high. However, in recent years several states have found places that can produce the tools.

Motion: David Dressler, PA: Form a workgroup to find a firm that can make sampling tools to AAFCO specifications, find prices, and the logistics of being able to sell to our members, and to report back to the committee during the 2023 Midyear Meeting. **Second: Jessica Gore, NC. Motion Carries**

The Work Group includes: Ethan Willis – MO; Jamie Spencer – KS; Daniel Zangari – CO; Dave Dressler – PA; A representative from KY to be announced. The final workgroup will be presented at the 2023 Midyear Meeting.

AITS & BITS Alignment Workgroup – Ashlee-Rose Ferguson, WA

Ashlee-Rose Ferguson commented on the progression of the AITS & BITS Alignment Work Group development of the new 507 PCAF inspection tool. She recommended that the committee continue to work on making the transition away from the old checklist. This charge will be brought back to the attention of the workgroup and an update provided during the 2023 Midyear Meeting.

Bulk Feed Tote/Super Sack Sampling Method Development Workgroup – Wayne Pendleton, VA

Wayne Pendleton offered comment from the audience about where the committee had progressed in developing a sampling method for bulk tote bags and super sacks. Miriam Johnson stated that the

committee will pick this project back up and work towards forming a workgroup to begin the initial research into proposing a draft method proposal. As the workgroup progresses with their research, validation of the method and developing an RFP to conduct this study will be further evaluated. Miriam Johnson will send a request to the ISC committee members via email for work group volunteers. The final workgroup will be presented at the 2023 Midyear Meeting. Meeting adjourned at 5:03 PM CST.

Action Item Table

Responsible	Item	Action	Timing / Status
AAFCO Branded Sampling Tools Workgroup	AAFCO Branded Sampling Tools	Find a firm(s) to produce sampling tools, confirm pricing and report back to committee	On-going/January 2023
Miriam Johnson	Sampling Study Review Committee	Waiting data results from KY and TX	On-going/January 2023
Miriam Johnson	BITS Training	Work with training cadre to prepare for training	On going/September 2022
Miriam Johnson	AITs Training	Work with training cadre to prepare for training	On going/June 2023
Miriam Johnson	Aseptic Sampling Training	Work with FDA to decide on providing a training and work on a method; submit proposal to ETC	On-Going/August 2023
AITs & BITS Alignment Work Group	cGMP checklist	Does committee train with old or new 507. Send email to committee	On-Going/January 2023
Bulk Feed Tote/Super Sack Sampling Method Development Work Group	Bulk Tote Sampling Study	Research current methods available; determine if validation study is necessary	On-Going/January 2023

Laboratory Methods and Services Committee Report

2022 AAFCO Annual Meeting
August 5, 8:00 am–5:00 pm, St. Louis, Missouri

Committee Recommendations: None

Board Recommendations: None

Committee Participants

Members Present: Joshua Arbaugh (WV), Srinu Chigurupati (FDA), Sally Flowers (KS), Buddhika Galkaduwa (KS), Tai Ha (NE), William Hoek (NY), H. Dorota Inerowicz (OISC), Mary Koestner (MO), Patty Lucas (FL), Kristi McCallum (co-chair/CO), Rebecca Moseley (AL), Sharon Webb (co-chair/UKY), Dancia Wu (OISC)

Advisors Present: Jenny Bailie (NutriQuest), Andy Crawford (Consultant AAFCO PTP), Jeff Horst (Agri King), Matt Nichols (Neogen), Lars Reimann (Eurofins), Ken Riter (PFI NPAL), Leo Schilling (Eurofins), Brian Fitchett (JM Smucker)

Virtual Attendees: Lawrence Novotny (Life member), Nancy Thiex (Life member), Brenda Snodgrass AAFCO PTP), Angela Swinford (FDA), Ametra Berry (GA)

Committee Report

Committee Activities

During the 2022 mid-year meeting, the LMSC created and/or renewed several working groups to address the regulatory needs from the Hazards and Contaminants survey sent in 2021. The LMSC agreed that sending this survey each year to State Regulatory officials is necessary to steer LMSC activities. The 2022 Hazards/Contaminants Survey was revised and will be sent to State Regulatory officials in October 2022. Working group updates are included in the minutes below.

The LMSC held a discussion on the proposed dietary fiber labeling changes in pet foods. The LMSC identified several AOAC OMA for dietary fiber and the need to determine which of the methods identified would be the most suitable for regulatory labs to use when analyzing for dietary fiber. The laboratories present currently analyze for crude fiber. The LMSC determined that a Dietary Fiber working group was needed. A new working group was formed, and several state and industry laboratory representatives volunteered for this new working group.

Lastly, training was discussed by the LMSC. Training needs were discussed, and the co-chairs presented the proposal for the Microbiology Hands-on Workshop created by Kristi McCallum. The LMSC agreed that training was critical to State Laboratories to maintain knowledge retention for methods (e.g. microscopy methods), new staff, etc. The LMSC agreed to use the proposal template submitted to the BOD for the Microbiology Hands-on course. In addition, the LMSC agreed to create a survey to capture training needs of state laboratories so that proposals for on-going training classes could be presented to the BOD in the future.

ACTION: Agenda approval

MOTION: Motion to accept agenda by Joshua Arbaugh; Seconded by Mary Koestner. Passes unanimously

MOTION: Motion to accept the meeting minutes/committee report so moved by Sharon Webb; Seconded by Tai Ha. Passes with 16 "Aye", 2 "Abstain", 0 "Nay"

Subcommittee Activities

The Quality Assurance sub-committee had disbanded due to the pandemic, retirements and lack of participation. The LMSC co-chairs discussed the critical need of this sub-committee. A new QA sub-committee was formed with volunteers from FDA and State LMSC members. The main charge of this sub-committee is to revise the AAFCO Quality Assurance/Quality Control Guidelines for Feed Laboratories to meet the updated IS17025 requirements

ACTION: None

MOTION: None

Committee Minutes

- 1) Welcome, Introductions, & Adoption of Agenda- K. McCallum & S. Webb
- 2) Review of Committee Roster and Appointments- Co-chairs
 - a. Please email Kristina.mccallum@state.co.us with any changes

- b. Please update your profile in FoodShield if your information is outdated.
- 3) Association of Public Health Laboratories (APHL) Update – R. Randolph
 - a. The APHL's Human and Animal Food Testing (HA)F subcommittee has been elevated to APHL Advisory Committee.
 - i. Applications open in Spring 2023. The start date will be July 1st. You must be a APHL member to join. For those interested, this links to the Public Health Associate Institutional (PHAI) member application: https://www.aphl.org/membership/Documents/MEM_PHL-Institutional-Associate-Membership-Application.pdf
 - b. Public Health Laboratory System Database – State labs, please consider entering your lab's testing methods and capabilities. Email Robyn Randolph for instructions.
 - c. Task Force to Engage Environmental and Agricultural Laboratories - evaluating the categories of public health labs to see how they can foster better cooperation. Public Health Associate Laboratories (PHAL) – Task Force is redefining who can join.
 - d. 2022 LFFM CAP meeting -St. Louis -Nov 15–17th
 - e. Training & Resources -there are a lot of training resources available on APHL website Training Portal. Access is restricted to government labs.
 - Quality Management Training Series (QMTS) available
 - Quality Assurance Community of Practice forum -connects over 300 laboratories
 - Evidentiary and Analyte Integrity Policy Checklist -helps laboratory guide conversation with their inspectors and identifies specific information about what is important for preserving sample integrity.
 - f. GenomTrakr Training & Meetings -Oct 19-20, College Park, MD.
 - g. ORA DX Collaboration -APHL is working with FDA, state partners and other associations to identify needs and concerns for implementing the data exchange.
 - h. NCS Laboratory Framework -goal is to build a competent workforce
- 4) LMSC Quality Assurance Sub-Committee – Co-chairs
 - a. LMSC QA Subcommittee needs to be revitalized, currently only Kristi and Sharon are left on the committee. It was originally formed around 2015/2016. The charge was to assist state labs with ISO17025 accreditation and to promote quality assurance.
 - b. The committee will revise the AAFCO Quality Assurance/Quality Control Guidelines for Feed Laboratories to meet the updated IS17025 requirements. The committee is also responsible for finding speakers to provide QA updates at the LMSC meetings.
 - c. New Volunteers: Sue Humphries (FDA), David Snell (OISC), Leo Schilling (Eurofins), Carrie Crabtree (GA), Robin Johnson (MT), and Srinivaslu Chigurupati (FDA)
- 5) Presentation/Discussion: Status of Laboratories -How are labs coping with a changing work environment? – K. McCallum
 - a. Supply issues – Examples include helium, analytical/reference standard materials, other consumable supplies, and equipment.
 - i. The solution for many labs is to adapt and change how their instruments operate (e.g., using hydrogen as a carrier gas instead of helium) and modify methods to use different materials/equipment
 - ii. There is no Vitamin A standard from USP available at this time which is preventing some labs from being able to analyze for Vitamin A. Sharon Webb is looking for an alternative and will use AGLabs list serv to contact labs if she finds an alternative source.
 - b. Costs have risen dramatically for chemicals, consumables, etc. but lab budgets have not. Shipping issues continue with major shipping companies creating delay in arrival of critical lab supplies and samples.
 - c. Staffing issues – Staff leaving, and morale are major problems in the labs because they are seeing others who are allowed to telework, and this is not possible for lab personnel as their jobs require them to be in the lab each day.
 - i. Solutions tried: West Virginia's lab started a day a week telework program where staff can work on document review and virtual training. CO has an ad hoc telework system where staff can ask to telework for special circumstances.
 - ii. Training new and existing staff -remote training doesn't work well and there are issues with the quality of candidate pools for hiring.
- 6) Presentation: A Comparison of Heavy Metals in Plant and Animal Based Meats and Fish by Microwave Digestion & ICP-OES and ICP-MS Analysis – Macy Harris, CEM

- a. Presentation will be uploaded on AAFCO website under Laboratory>Meeting Minutes and Presentations
- 7) Dietary Fiber Testing – J. Arbaugh
 - a. Changes in pet food labeling are being discussed by AAFCO with the major change being from Crude Fiber to Dietary Fiber.
 - b. If labs will be asked to test for dietary fiber, a method consensus is needed. The concern is that some materials may be used that are not truly fiber so having the correct method is very important. Josh looked at PT samples and there was only one data point found for dietary fiber. Methods 2020-07 (included pet food) and 991.433 are in the PT program now. There are other methods such as 2017-16 that are not.
 - c. Recommendation: Consult with an FDA nutritionist to give us an idea of what we should be testing as it relates to pets. Method 985.29 may have been validated for pet food but can't find the data. Once the label change is/if passed, industry would be given 2-3 years to update labels.
 - d. Methods: AOAC 991.43 -Total Dietary (TD) -doesn't include pet feed, AOAC 2009.01 –TD -not sure if it includes pet feed, AOAC 2011.25 –TD
 - e. A Dietary Working Group was formed and includes the following: Josh Arbaugh will Chair, Mary Koestner, David, Lars Reiman, Ken Riter, Matt
- 8) Presentation: Dioxin Analysis in Feeds at the CFIA Calgary Laboratory - Nishma Karim
 - a. Presentation will be uploaded on AAFCO website under Laboratory>Meeting Minutes and Presentations
- 9) LMSC Working Group Updates
 - a. **Fat Soluble Vitamins**
 - i. The Vitamin A study has been published and is available as open access (<https://doi.org/10.1093/jaoacint/qsab158>). The next step for Vitamin A will involve strategies for dealing with the large test portion sizes (100 grams +) required, but no experiments have been performed since the last meeting. Vitamin D3 has been added to the working group, but no discussions yet.
 - ii. Vitamin E conversion factors are listed in AOAC methods 971.30 and 948.26.
 - b. **Multi-element**
Update: Working Group is gathering the methods. Next steps will be to review the methods for best practice guidance.
 - c. **Mycotoxins**
Update: The Working Group needs to gather information on what methods are currently being used (survey?), review the methods and work on best practices for the website. The focus of this working group will be to create best practices for a variety of parameters (e.g., sample storage, container types, extraction method).
The Randox PT codes have been added to the PT program.
 - d. **Moisture KF method in pet food – L. Novotny**
Update: Lawrence will be calling the working group together. It's a small group of 4-6 people so if anyone else wants to join, please email Lawrence at actup@brookings.net
 - e. **Microbiology**
 - i. Microbiology Training: Kristi presented a training proposal to AAFCO board of directors for a weeklong course for a small group. Training topics will include how to set up a micro lab and will include class work and hands on experience. The board approved it and AAFCO wrote a grant proposal to FDA to fund it and they are awaiting the notice of award. The attendees should have some basic lab experience. The training will be scheduled for early spring 2023.
 - 1. The AAFCO board supports funding projects like this, but we need to see what is involved and something like what Kristi put together would be great. Kristi can send you the template she used to put together her training proposal. Rebecca -how do labs apply for this?
 - 2. Recommendation: The LMSC would like to develop a training program that other could rotate to interested State labs. In addition, small trainings where a lab could send 1-2 staff to a State lab for training on a specific method would be beneficial to all labs.

3. AAFCO Procedure Manual -page 28 -contains the AAFCO procedures for submitting proposals
- ii. **Microscopy:**
 1. Concerns were raised that laboratories are losing expertise and knowledge in microscopy analyses. There are for basic areas of microscopy to focus on, prohibited materials (BSE), other adulterine, noxious weed seed, and ingredient identification.
 2. K. McCallum is willing to reach out to FDA to see if they still offer any training. There is no formal PT program for microscopy competency.
 3. Josh asked if any state's regulatory program is asking for this testing. MO has requests for contaminants. KS had a request for filth testing.
 4. Recommendation -LMSC may be able to create our own level 1 class.
- f. **Pesticide Residues**
 Updates: Concerns were raised by the LMSC as to how many state regulatory programs have regulatory statutes regulating pesticides in feeds. Most state labs have a pesticide testing capabilities but pesticides are regulated by divisions withing their state DOA not related to animal feed. Josh Arbaugh will raise the concerns to the Enforcement Committee. This working group may not be necessary. Below is the link to the CPG Sec 575.100 Pesticide Residues in Food and Feed - Enforcement Criteria
https://urldefense.proofpoint.com/v2/url?u=https-3A_www.fda.gov_regulatory-2Dinformation_search-2Dfda-2Dguidance-2Ddocuments_cpg-2Dsec-2D575100-2Dpesticide-2Dresidues-2Dfood-2Dand-2Dfeed-2Denforcement-2Dcriteria&d=DwMFAg&c=sdnEM9SRGFuMt5z5w3AhsPNahmNicq64TgF1JwNR0cs&r=vJd14lvF3JV9ejyQ3tltzkaCx6fOgfbxfnXFTg7HpNE&m=IJU0smxUO85tvP-4T9EkNQYtYBagU_GA-4lcE4JhpiNYUOyCRcLpGo9mDD2IB5PJL&s=dvJcJmTbTGkosQx_VGQkWdxY9SF_UeHGSm oDa9O9xpE&e=
- g. **Drug Residues**
 Updates: The working group is unclear as to what the specific regulatory need is (e.g., medicated feed, feed ingredients, completed feed). Monensin and Lasalocid were the most critical needs from the regulators. Methods are well established but may need best practice guidance.
- h. **Toxins: Pentobarbital, Dioxin**
 Update: None as working group lead was unable to attend the meeting. See Dioxin presentation posted on AAFCO website.
- i. **Hemp**
 Update: Hunter Buffington met with ASTM where they discussed ASTM progress. ASTM D8440-22 -Table 1 -Specification for Food Safety and Quality of Hempseed Products Intended as Food. 2017 is when ASTM has started looking at cannabis. There are now over 40 standards. ASTM will assist with validation study for oil. There are many interested in participating but a method needs to be established first. The method chosen will need to be able to detect very low total delta-9 THC levels and therefore will likely be on an LCMSMS platform. The LMSC recommends performing a matrix extension validation study of the AOAC OM 2018.11 to include finished feeds and pet food.
- j. **Round Table Discussion**
 - i. Lars Reiman -With older committee members retiring, Lars raised a concern to the group to find out where the AAFCO FDA master file is kept and who oversees it. From Linda Benjamin: Becky Owens is the contact person for the AAFCO Master Files.
Rebecca L. Owen, Ph.D. (she/her/hers)
Supervisory Chemist, Feed/Topical Team
Division of Manufacturing Technologies
Office of New Animal Drug Evaluation
Center for Veterinary Medicine
U.S. Food and Drug Administration
 Tel: 240-402-0670
rebecca.owen@fda.hhs.gov
 - ii. Leo Schilling inquired about the interest from State labs for a Tylosin method, is there still an interest from the states in a micro method anymore? Indiana sees 4 or 5 samples a

year. Sally is seeing about 10 samples a year. No other states responded that they see Tylosin samples.

- iii. Jeff Horst: The Sugar Profile method AOAC 2018.16 that all of you participated in for the multi lab validation was voted yesterday by the AOAC ERP to Final Action.

Action Item Table

Responsible	Item	Action	Timing / Status
Co-chairs	Annual Hazards/Contaminants Survey	Revise and send survey to regulators for 2022	October 2022/Sent to AAFCO for email distribution
LMSC QA Sub-committee	QAQC Guidelines	Revise the QAQC Guidelines to align with ISO17025:2017	September 2022–January 2023

Model Bills and Regulations Committee Report

2022 AAFCO Annual Meeting
August 4, 2:15–3:00 pm, St. Louis, Missouri

Committee Recommendations

1. 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 282-288 be deleted and the AAFCO Board of Directors review the proposed deletion for future consideration by the Association membership.
2. The Model Bills and Regulations Committee recommends that Model Regulation 8 (c) on page 140 of the printed 2022 *Official Publication* be modified as follows (new language **bold and underscored**) and the AAFCO Board of Directors review the proposed modification for future consideration by the Association membership.

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 Recommendations: None

Committee Report

Model Bills and Regulations Committee Co-Chairs Dan King and Doug Lueders called the meeting to order at 2:15 p.m. central on Aug. 4, 2022.

Committee members participating in the meeting were: Ken Bowers (Kansas), Eric Brady (Tennessee), David Dressler (Pennsylvania), George Ferguson (North Carolina), April Hunt (FDA), Miriam Johnson (North Carolina), Ben Jones (Texas), Richard Ten Eyck (Oregon), Austin Therrell (South Carolina), and Scott Ziehr (Colorado).

Industry advisers participating were Meghan Dicks (AFIA), Dave Dzani (APPA/ACVN), Emily Helmes (ETA), Jan Campbell and David Fairfield (NGFA), Catherine Alinovi (NGPFMA), and Angele Thompson and Pat Tovey (PFI).

Minutes from Previous Committee Meetings

Dan King noted that minutes from the committee's meeting conducted on Jan. 18, 2022, were previously approved on Feb. 10, posted on the AAFCO website and in the Feed BIN, and included within the 2022 AAFCO Annual Meeting Committee Report Book.

Labeling Workgroup Report

Scott Ziehr reported the workgroup recommended the current labeling definition in Model Bill section 3 (j) (page 114 of the printed 2022 *Official Publication*) be revised as follows (new language **bold and underscored**, deleted language ~~stricken through~~).

The term "labeling" means all labels and other ~~written, printed or graphic matter~~ **materials issued by a guarantor or distributor** (1) upon a commercial feed or any of its containers or wrapper, or (2) accompanying **or supporting** such commercial feed.

During the subsequent discussion about the recommendation, comments expressed included:

1. The word "electronic" should be incorporated into the definition to expressly include materials made available on webpages about commercial feed.
2. The word "issued" should be changed to "published."
3. The word "supporting" is broad, and potentially could be defined. Also, the word "supporting" could be changed to "promoting."

In response to committee discussion on the recommendation, Doug Lueders charged the workgroup to further consider the definition and provide recommendations to the committee for review during the 2023 AAFCO Mid-year Meeting.

Feed and Feed Ingredient Manufacturing Committee VSIP Workgroup Report

Austin Therrell reviewed the following recommendation concerning information about the AAFCO VSIP Pilot Program Structure Plan currently printed within the *Official Publication*.

The Feed and Feed Ingredient Manufacturing Committee (FFIMC) recommends the Model Bills and Regulations Committee (MBRC) remove the AAFCO VSIP Pilot Program Structure Section in

Chapter Five of the printed 2022 *Official Publication* on pages 282-288 and archive it for historical reference in the Feed BIN. The workgroup further recommends that MBRC conduct a separate review of the AAFCO Model National Medicated Feed Program beginning on page 263 of the printed 2022 *Official Publication*, as it is implicated by the VSIP Pilot Program Structure and may also need to be removed for clarity.

Scott Ziehr moved that the recommendation to delete the AAFCO VSIP Pilot Program Structure Section in Chapter Five of the printed 2022 *Official Publication* on pages 282-288 and archive it for historical reference in the Feed BIN, be accepted and that the AAFCO Board of Directors review the proposed deletion for future consideration by the Association membership.

Ken Bowers seconded the motion, and the committee approved.

Pursuant to the FFIMC's recommendation pertaining to the AAFCO Model National Medicated Feed Program, Doug Lueders charged the FFIMC to review the AAFCO Model National Medicated Feed Program section beginning on page 263 of the printed 2022 *Official Publication* and make recommendations to the MBRC regarding removal of references to the VSIP section.

Model Regulation 8 (c) Non-Protein Nitrogen

Richard Ten Eyck moved that Model Regulation 8 (c) on page 140 of the printed 2022 *Official Publication* be modified as follows (new language **bold and underscored**) and the AAFCO Board of Directors review the proposed modification for future consideration by the Association membership.

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.

Ken Bowers seconded the motion, and the committee approved.

Model Regulation 4 (d) Guarantees for Drugs

The committee considered the following proposed revisions to Model Regulation 4(d) on page 137 of the printed 2022 *Official Publication* (new language **bold and underscored**, deleted language ~~stricken through~~):

- 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) **(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.

The basis provided for the proposed revisions was that the introduction of 21 CFR 558.6 – Veterinary Feed Directive Drugs and associated FDA policies no longer allow growth promotion and/or feed efficiency claims regarding drug sources.

During subsequent committee discussion it was noted that growth promotion and/or feed efficiency claims are still allowed for non-medically important antimicrobial drugs (e.g., bacitracin and ionophores). Also, it was noted that the Model Bills and Regulations Committee previously took action related to this topic in 2017, but that no further action was taken by the AAFCO Board of Directors or membership.

Given the issues raised, George Ferguson moved that a workgroup be established to further consider the topic and provide recommendations at the 2023 AAFCO Mid-year Meeting.

David Dressler seconded the motion, and the committee approved.

Committee members and advisors to serve on the workgroup are Eric Brady, Jan Campbell, Meghan Dicks, April Hunt, Dan King, and Ben Jones.

Statements of Uniform Interpretation and Policy (SUIP) Biennial Review

Due to time constraints, no action was taken on the SUIP agenda item to initiate a biennial review of the SUIPs found in Chapter 5 of the *Official Publication*. Per AAFCO policy, the review is to be completed by the 2023 AAFCO mid-year meeting. The work group will review the current document and confirm that the

previously membership approved changes have been implemented, and suggest updates to the current SUIP section.

Adjournment

The committee meeting was adjourned at approximately 3 p.m. central.

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

Pet Food Committee Report
2022 AAFCO Annual Meeting
August 5, 10:00 am–12:00 pm, St. Louis, Missouri

Committee Recommendations: None

Board Recommendations: None

Committee Participants

Members Present: Liz Beckman (WA – Chair), Stan Cook (MO – Co-chair), Darrell Johnson (BOD Liaison), Chris Berg (IA), William Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM), James Embry (TX), George Ferguson (NC), Madison Fink (MO), Kristen Green (KY), Kristen Hamilton (ID), Tiffany Leschishin (MN), Barbara-jean Schliecher (KS), Katie Simpson (IN), Austin Therrell (SC), Justin Hill (NC), Holly Jewell (NC).

Advisors Present: Bill Bookout (NASC), Louise Calderwood (AFIA), Dave Dzanis (ACVN), James Emerson (US Poultry and Egg), Dave Fairfield (NGFA), David Meeker (NARA), Chris Nash (PFAC), Angele Thompson (PFI), Pat Tovey (PFI), Cathy Alinovi (NGPFMA)

Committee Report

Human Grade Working Group – Holly Jewell, NC

The human grade workgroup has been meeting with the USDA-AMS. The workgroup has a checklist, guidelines and example documents. The workgroup decided to modify the labeling requirements section on the checklist to limit the need for a label review by the AMS auditor. The documents are available in the PFC Members and Advisors team site in BIN for 2 weeks for full members and advisors to comment. The plan is to conduct an e-vote by the PFC on the documents at the end of August so that the documents can go to the BOD for final approval. The current checklist for the AMS audit can be found online in Appendix A (under 2022 Annual at <https://www.aafco.org/Regulatory/Committees/Pet-Food>). The new Human Grade Guidelines and a new definition for the term ‘human grade’ passed by Membership vote on Thursday, August 4th and will be published in the 2023 Official Publication. Implementation of the USDA-AMS Human Grade audit process will start as soon as the checklist is finalized.

Copper Workgroup – Dr. William Burkholder, FDA-CVM

The copper workgroup has completed their work and the report will be made available in the Feed Bin for comment. The report will be discussed publicly at the January 2023 mid-year AAFCO meeting.

Kristen Green moves that the PFC accept the Copper Workgroup Report (Appendix B under 2022 Annual at <https://www.aafco.org/Regulatory/Committees/Pet-Food>). Charlotte Conway seconds. Motion carries.

PFLM Implementation Workgroup – Stan Cook, MO

There has been lots of work done by industry and members both.

The groups are still working on some language for nutritional adequacy and safe handling. The group is very close to having the draft Model Bill language ready. Regulators came together on Wednesday August 3rd and went over the four parts of the PFLM project to get feedback in real time from those who are looking at this fresh. The meeting was put together quickly and AAFCO appreciates the organizers as well as those that attended and provided input.

The nutritional adequacy statement will be included at the bottom of the facts box. Right now this is in consumer research for quantitative review. The group is also assessing 3 intended use statements. The Consumer Research report should be available in September.

The PLFM Implementation challenge is to implement the new labeling requirements across 50 states and industry will be a challenge, group continues to work, open to suggestions for how to get this information out to industry. Education will be required for small pet food manufacturers, especially those that are not aware of the work being done.

- 50 state webinars –to start in next few months. To educate regulators.
- Develop and provide educational materials for industry, states, consumers. Going to need help in identifying and providing opportunities to educate.
- Timeline (keeps moving) – seeing progress
- PFC is trying to keep process transparent, hoping to pull more folks in to help.

This presentation (Appendix C under 2022 Annual at <https://www.aafco.org/Regulatory/Committees/Pet-Food>) will be attached to the minutes on the PFC website. Still working on the final language, market research done in September, no plans yet for how to make that public. Qualitative and quantitative research (600 people total) has been done or is in the process of being completed.

The current tentative timeline is available in the presentation. In general, the comment period will be open in the next month or so. Workgroups will convene to make updates to the Model Regulation in mid-November based on comments. The draft Model Regulations will then go to the full committee for review. In December, PFC hopes to vote on the Draft Model Regulations, and send the Draft Model Regulations to the Model Bill and Regulations Committee (MBRC). January will have more information about implementation and planned trainings.

Implementation will be difficult, and lengthy, and some states will struggle to adopt within a couple of years, during this period, states will need to utilize discretion. AAFCO sent out a survey to state members asking about how states apply discretion. Implementation is going to require a lot of education. There is concern by industry that they will start implementing, but that certain states will require the old labels still. The logistics of changing labels is going to be challenging. Getting the resources to make the changes will be difficult, as firms will be competing for limited resources. Time and patience will be important. The formatting changes for labels are significant and the crude fiber guarantee will be replaced by dietary fiber.

PFC intends to send out another survey after doing the 50 state webinars. Industry is interested to know if there are any states that would be a roadblock to the overall implementation process.

Training and Outreach Sub-Committee – Chris Berg, IA

Pet Food Labeling Guide is being updated to match the 2022 Model Regulations, currently in track changes mode. A workgroup will be put together to see how to publish (maybe just electronically) an updated version while PFLM finishes.

Upcoming training ideas:

- Pet Food Forum – Labeling workshop. May 2022 workshop was successful. Did three 15 min talks.
- AAFCO meeting – have a labeling workshop.
- Maybe include some industry meetings – such as Super Zoo, IPPE, industry association Meetings.

There will be a lot of upcoming training/outreach needs.

- Regulatory
 - Legislative
- Industry
- Consumers
- Veterinarians

It was suggested that PFC put forth a template document listing trainings, places, audiences for PFLM implementation and send this as a single proposal to the BOD. This roadmap should list the majority of items, for ex: 18-24 months out. Consideration of getting a project manager for the implementation.

Website Update – Chris Berg, IA

AAFCO as a whole is completely updating AAFCO's websites. AAFCO requests industry associations for a single email about how their industry and other groups use the AAFCO website. For ex. what is important, etc. in 30 days. aafco@aafco.org. This request is regarding the website only and does not include the Feed BIN.

Contact Chris Berg if you are interested in assisting.

Meeting concluded at 12:00 PM

Proficiency Testing Program Committee Report

2022 AAFCO Annual Meeting
August 4, 1:30 pm, St. Louis, Missouri

Committee Recommendations

Increase Scheme prices by 20% effective for the 2023 Proficiency Testing Program Year. Prices of each Scheme:

- a. Animal Feed - \$540.00/year
- b. Pet Food Ingredients - \$540.00/year
- c. Minerals - \$540.00/year
- d. Mycotoxin Contaminants - \$800.00/year

Board Recommendations: None

Committee Participants

Members Present: Heidi Phillips (PTP QA Manager), AAFCO; Josh Arbaugh, West Virginia Department of Agriculture; Kristi McCallum, Colorado Department of Agriculture; Mary Koestner (Vice-Chair), Missouri Department of Agriculture; Patty Lucas, Florida Department of Agriculture & Consumer Services; Sharon Webb, University of Kentucky Division of Regulatory Services; Sally Flowers (Chair), Kansas Department of Agriculture; Tai Ha, Nebraska Department of Agriculture; Teresa Rygiel (Vice-Chair), Florida Department of Agriculture & Consumer Services

Advisors Present: Frank Sikora, Magruder PT Program; Ken Riter, PFI; Lars Reimann, AFIA

Virtual Attendees: Ametra Berry, Georgia Department of Agriculture; Brenda Snodgrass (AAFCO PTP Program Manager), AAFCO, AAFCO Life Member; Deepika Curole, Louisiana Department of Agriculture and Forestry; Gail Swinford, FDA; Nancy Thiex, AAFCO Life Member; Sue Humphries, FDA; Tom Phillips, Maryland Department of Agriculture; Andy Crawford (PTP Statistician), Crawford Consulting Services; Bob Kieffer (PTP), Able Laboratories

Committee Report

Mary Koestner (MO) was introduced as a second Vice Chair to the PTP Committee. In an update of a recent internal audit of the program, Heidi Phillips reported that the quality management system is a well-oiled machine and that Able Laboratories is in good shape. There will be an ANAB audit this December. The committee discussed the possibility of moving heavy metals from the Animal Feed Scheme to the Mineral Scheme; however, it was decided to leave both schemes as is because the Animal Feed Scheme better represents minerals that are naturally occurring in feeds.

There was discussion of the need to increase the annual subscription price and its impact on subscribing laboratories. The last price increase took effect in January 2018 at 25%. Reasons for the current increase include: end of the 5-year FDA grant that provided start-up funds; transition of the QA Manager position from voluntary to paid; higher costs for shipping and materials; plus an expansion of FASS administrative operations to serve PTP subscribers. The committee agreed on a 20% cost increase effective January 2023.

Trilogy Labs gave a presentation on the impact of mycotoxins on the feed industry and ways to manage testing for 2022 harvest season. Lastly, there was no AV workgroup activity to report at the time of the committee meeting as additional guidance was forthcoming from the Board.

Committee Activities

ACTION: Increase Scheme Prices by 20% effective for the 2023 Proficiency Testing Program year

MOTION: N. Thiex/Second: J. Arbaugh —passes

Subcommittee Activities: None

Committee Minutes

1. Meeting was called to order by Committee Chair, S. Flowers
Meeting agenda was reviewed and approved
2. Program Leadership and Administrative Update
 - a. Mary Koestner was welcomed as the second Committee Vice-chair. She joins Teresa Rygiel in her role as Committee Vice-chair.
 - b. Heidi Phillips provided an update on the Program's ISO 17043 Quality Management System
 - i. As the new Quality Manager, Heidi finds the existing documentation is impressive.

- ii. An Internal Audit of the PT materials preparation process (SOP and record review) was completed. Both Able Labs and Trilogy met with Heidi by phone. No deficiencies were noted. One form used for reviewing the bag labels for PT Samples (Test Items) did not note who was performing which parts of the review, although the reviewers were noted. The Form was revised to capture this information and the old form was archived.
 - iii. Heidi plans to complete the Internal Audit of the remaining components of the System in the next two months.
 - iv. ANAB, the Program's Accrediting Body, will do a remote assessment at the end of this year. Tentatively the assessment is set for early December 2022. The assessment includes a document review and virtual meetings with the Program personnel. Heidi is coordinating the meeting dates and submitting documents to ANAB for the Assessor's review.
- 3. January 2023 Items for Consideration:
 - a. Program Manager, B. Snodgrass, lead a discussion on moving all the heavy metals testing from the Animal Feed Scheme to the Minerals Scheme. While this may increase participation in the Minerals Scheme, no attendee was in favor of removing the heavy metals for the Animal Feed Scheme, and some people were strongly opposed to doing so. Brenda said that enrollment/participation in the Minerals Scheme has steadily improved since its inception. The advantage of retaining the heavy metals in the Animal Feed Scheme is the amounts present are incurred (naturally present) whereas those in the Minerals Scheme are spiked (artificially added). Since its introduction in 2012, the Minerals Scheme has also expanded the list of analytes to include speciation of the particularly hazardous analytes (Arsenic, Chromium, and Selenium species). Statistician, Andy Crawford, stated that the Minerals Scheme statistical analysis is different than that used for the same analytes in the Animal Feed Scheme. Animal Feed uses robust assigned means for the assigned value and robust standard deviations when a sufficient number of results are reported, otherwise simple means and standard deviations are used. Minerals uses robust means for the assigned value, but the standard deviations are calculated using the assigned value and the corresponding published "Horowitz" predicted standard deviations. More information on the statistics used for each may be found on the Program's webpage, <https://pt.aafco.org>. The attendees were all in agreement to continue including the heavy metal analytes in the Animal Feed Scheme.
 - b. Drug Concentrates for PT Materials Preparation: B. Snodgrass let the Committee, Advisors, and guests know that she is trying to find several medicated articles of higher concentration for the inclusion of medications subject to the Veterinary Feed Directive regulations, and some medications that can still be purchased over-the-counter, but do cost more than non-medicated feed. In particular, the Program needs Oxytetracycline, Lasalocid, and Monensin. Sharon Webb said that she can likely provide some medicated articles to the Program since the University of Kentucky does manufacture some of these medicated feeds. With the help of Tom Phillips, the Program has a good stock of Chlortetracycline and Amprolium. Eric Brady (TN) was also mentioned as a potential contact, but he has not been able to find a source willing to donate medicated articles.
 - c. Price increase for PT Schemes: B. Snodgrass presented the Committee with a proposed price increase of 15% (rounded to the nearest \$10) for all Schemes in order to keep the Program on secure financial footing. In addition, Brenda also showed possible price increases of 10% and 20% for the Schemes. The last price increase was in 2018 and was a 25% increase. That increase was due to the end of a 5-year FDA Cooperative Agreement that paid for accrediting the PT Program to ISO 17043 and addition of two of the four Schemes (Minerals and Mycotoxin Contaminants).
 ACTION: Increase Scheme Prices by 15% effective for the 2023 Proficiency Testing Program year. MOTION: N. Thiex, Second: J. Arbaugh
 Discussion was had about increasing prices by 20% and how this increase would give the Program an estimated five years of stability. Members felt it would be best to increase prices by 20% at this meeting, so the Committee would not need to consider another price increase in three years or less. It was noted by Advisor L. Reimann that AAFCO's PT Program was much

less expensive than similar PT Programs located overseas. Brenda also stated the AAFCO PT Schemes are far lower than US based Accredited Human Food PT Programs.

AMMENDED: Increase Scheme Prices by 20% beginning in the 2023 Program Year.

MOTION: N. Thiex, Second: J. Arbaugh. MOTION PASSES unanimously.

See PT Program Manager Updates 2022 Annual Meeting Presentation

4. Program Budget Review:

B. Snodgrass presented the Program's budget for the last several years and noted that to cost of doing business in increasing each year. This includes freight and courier costs (>20% overall); cost of PT Materials (inflation); wages for the Quality Manager (H. Phillips) and Program Manager (B. Snodgrass) who is no longer a state lab volunteer; fees for on-site assessments (travel & hotel are higher, although accreditation fees are relatively stable); travel costs for Program personnel; calibration of reference weights and analytical balance; and a modest price increase for the Mycotoxin Contaminants that the Program purchases from Trilogy Labs, our contract provider. It was noted that while participating labs do pay the shipping costs for their PT Samples, but the Program pays for shipping PT Materials to Able Labs (Prep Lab) in Tennessee, for reshipping lost or damaged shipments to participants. As of January 2022, FASS provides an assistant to the PT Program who is the first point-of-contact for participant enrollment, invoicing and triaging customer requests. It has been more than 3 years since FASS has done this for the PT Program and Brenda gave her personal thank you to Tammy Plank for doing such excellent work for the Program. The PT Program pays FASS for the hours worked by FASS staff, whether that be for enrollments, invoicing, or IT needs. Brenda projected those cost to be around \$10,000-\$15,000 per year.

AAFCO PT Program Budget Overview								
	FY 2023 (July 2022 -June 2023)		FY 2022 (July 2021 -June 2022)		FY 2021 (July 2020 -June 2021)		FY 2020 (July 2019 -June 2020)	
	To Date	Approved	Actual	Approved	Actual	Approved	Actual	Approved
Total PT Program Revenue		\$ 347,000.00	\$ 338,373.44	\$ 318,500.00	\$ 286,076.76	\$ 301,700.00	\$ 259,923.34	\$ 251,500.00
Total PT Program Expenses		\$ 269,000.00	\$ 213,215.65	\$ 239,306.80	\$ 198,291.44	\$ 205,306.80	\$ 170,779.87	\$ 202,400.00
(Revenue - Expenses)		\$ 78,000.00	\$ 125,157.79	\$ 79,193.20	\$ 87,785.32	\$ 96,393.20	\$ 89,143.47	\$ 49,100.00
Percent Actual of Approved = 100 X (Actual/Approved)			158%		91%		182%	

5. Scheme Discussion

a. 2022 Subscription Status – B. Snodgrass

AAFCO PT Program Schemes				
4-Year Program Participation Comparison				
# of Labs (# Ordered)				
SCHEME NAME	2019	2020	2021	2022
Animal Feed	261 (270)	234 (234)	181 (181)	235 (243)
Pet Food Ingredients	74 (87)	69 (79)	42 (42)	95 (108)
Minerals	40 (40)	42 (42)	30 (30)	52 (52)
Mycotoxin	74 (74)	72 (74)	64 (64)	91 (91)

b. Customer Feedback – B. Snodgrass

Labs were asked if any of them routinely test Urea and/or NPN. Two labs are and there is interest among some of the international labs. Brenda said it is difficult to get good data for the statistical analysis because results show some labs report both of them as the Crude Protein Equivalent (CPE) rather than reporting % Urea and % Nitrogen for NPN. Brenda will contact the labs reporting CPE directly to let them know they need not use a CPE conversion factor (typically 6.25 for blended/complete rations.)

Program received an email from laboratory testing Vitamin E. They wanted to know if they should report out all isomers. Attendees agreed only the alpha-isomer should be reported. AOAC 970.11 has conversion factors for all isomers, however, it was noted that in complete rations, Vitamin E is the synthetic version which is the alpha-isomer. Brenda also let the attendees know that Vitamin E (Fat Soluble Vitamins) Methods Needs Statement for Vitamin E from the Laboratory Methods & Services Committee needs to be reviewed as it appears the

- Vitamin E acetate form conversion factor is different than the Vitamin E tocopherol form conversion factor. Laboratory Methods & Services Committee Chairs noted they would review the Method Needs Statement & update as needed.
6. Mycotoxins Presentation – Jordon Bierbaum, Trilogy Labs (*See The Mycotoxin Challenge AAFCO 2022 Presentation attachment in Appendix A*)
 7. Lab and Enforcement Issues Committee (EIC) AV Working Group (WG) Update - B. Snodgrass
Brenda revisited the change that was proposed to the Analytical Variance Tables in the AAFCO Official Publication (OP) during the January 2022 Committee Meeting in Mobile. The change would have impacted many stakeholders, including state and federal regulatory program officials, regulatory labs, and industry. That change was never published in any OP. Brenda thanked the Committee Members that were present for that meeting for taking the change to the Enforcement Issues Committee. She also thanked the Committee Advisors for their input on the discussion. Brenda stated that the Joint EIC-Lab AV Recommendations WG has been paused by the AAFCO Board of Directors since the last Committee Meeting. Brenda spoke with the AAFCO President-Elect who assured her that the WG was of high importance to all of AAFCO. The Board plans to reactivate the WG in the coming months which will include a charge from the Board on the specific work to be accomplished.
 8. Other Business
 - a. Dancia Wu was asked to discuss the stability of Bacitracin in ground feed samples. Significant degradation follows grinding, especially if the material is in warm environments. Dancia stated that recovery of Bacitracin drops to ~50% upon grinding and that participating labs should expect recoveries as low as 30% of the estimated analysis when a sample is stored without freezing. Bacitracin is a molecule of small peptides and easily degraded and is stable for at least 6 weeks if unground, or 6 months unground in a refrigerator (~4°C). Bob Kieffer From Able Labs blends materials before they are ground for packaging.
 - b. Sharon Webb mentioned that amprolium is used mostly in the spring, so it doesn't need to be included year-round for US participants. Many labs may not test it in a PT Sample during other times of the year.
 9. Round Table
 - a. New York asked if another unground sample could be sent to participants, like was done several years ago. Test Item Homogeneity is a requirement of ISO 17043, so if done, it would not be covered by the Program's ISO 17043 Accreditation (out of scope). The previous time this was done the Program was not accredited. Nancy and Bob believe it was a Meat and Bone Meal matrix, which will not pass through the grinders without significant alteration of the grinding process. While it may be feasible for individual labs to grind small amounts of such materials using dry ice, Able Labs is grinding 200 pounds of material at a time. Able Labs is now using a jaw crusher type grinder for difficult matrices (like Tortoise Feed, which is very hard) and high fat matrices, like some pet foods. Further, the statistical analysis for between lab variability is meaningless unless all PT samples sent to participants are reasonably homogenous. If the PT Program must do random testing of unground material for homogeneity, it would cost on the order of \$20,000 for each PT Sample (round).
 - b. The AAFCO Website is being redesigned. Committee Chairs have been asked to review the information and documents on their parts of the website. There was consensus that the PT Statistical Reports should all be retained on the PT Program's part of the website, along with the Guidebooks, Manuals, and Statistical Evaluation References. Sally will relay that to the group working on the redesign. This information should not be placed in the FeedBIN since most laboratories do not have a FeedBIN account. It would also prevent customers from viewing older reports that are needed for the Quality Reference Materials (QRMs).
 - c. The attendees were asked if there was any interest in purchasing the Canned Dog Food QRM. There was interest, so Bob & Brenda will work on a plan for labs to order them. They will be priced at \$80.00 per case of 12 cans (~5.5 oz. per can), plus shipping. They will only be sold to US labs.
 - d. J. Arbaugh asked if the Program knows what type of QRMs are the best sellers. Although we don't have an exact count, Bob said most are from the Animal Feed Scheme. Bob can provide the information to Brenda to report back to the Committee at a future date.
 10. The meeting was adjourned.

Action Item Table

Responsible	Item	Action	Timing / Status
Program Manager Able Labs, and FASS IT	2023 Program Year Subscriptions	Set up 2023 Program Schemes with new prices and Sept 2023 (current) postal rates; Open enrollment to begin on or about November 1, 2022	Mid-October 2022
Program Manager, Able Labs, and FASS	Canned Dog Food QRM Sales	Create order form and place on QRM ordering webpage for customer to use when ordering	November 2022
Committee Chair, Committee Board Liaison & Program Manager	Joint EIC-Lab AV Recommendations Working Group (WG)	Small WG awaiting Board confirmation of WG Charge (direction, goals & tasks)	Pending, but expected to have Board charge in ~ December 2022
Committee Chair, Vice Chairs, Program Manager	Website Redesign	Continue working with Current Issues & Outreach Committee (CIOC) & website designer (Philosophy) to review proposed changes to new website, including what information to remain on AAFCO website	Ongoing
Program personnel	ANAB Remote Assessment for 2023	Complete assessment for continued accreditation of PT Program	November–December 2022

Appendix A: Attachments

PT Program Manager Updates 2022 Annual Meeting (PowerPoint Presentation)

- Under Reports/Minutes “2022 Annual – St. Louis, MO” at <https://www.aafco.org/Regulatory/Committees/Proficiency-Testing-Program>

The Mycotoxin Challenge AAFCO 2022 (PowerPoint Presentation)

- Under Reports/Minutes “2022 Annual – St. Louis, MO” at <https://www.aafco.org/Regulatory/Committees/Proficiency-Testing-Program>

Strategic Affairs Committee Report

2022 AAFCO Annual Meeting Virtual
August 6, 8:00–10:00 am, St. Louis, Missouri

Committee Recommendations

- **Report acceptance.**
- **Recommend:**
 - A. **Board Minutes publishing:**
Edit the row ***“Post Approved Minutes”*** in **Table 4 BOD Post-Meeting Deadlines and Responsibilities** on P. 100 of the 2022 AAFCO *Official Publication* 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 2021 AAFCO Procedures Manual on P. 15.

Additional comments for Board consideration:

The workgroup also requests that the Designated Representative of the Association Management Firm (DRAMF) begin capturing the business meeting items after each BOD meeting to build the business meeting agenda throughout the year and post the updated document in the appropriate upcoming meeting section (Midyear or Annual) on the AAFCO website. This document would be updated with recommendations for the membership after each BOD meeting if appropriate. The workgroup also recommends providing training on best practices for capturing minutes for meetings for all that are taking minutes.

- Discussion: need to provide guidance on balancing information (e.g., not too much)
- Suggest that ETC handle drafting guidance and CIOC include in member toolkit. Meeting minutes template should be stored in Bin Library.

B. Life Member privileges

Excerpt from the OP with suggested changes (Guidelines, Page 106, 2022 Hard copy of OP):

(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 determine by the AAFCO BOD to be equivalent of these criteria:

1. 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.
2. 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.

Nomination Procedure: (unchanged)

Assessment of Life Membership Nomination: (unchanged)

Pause of Benefits: (new language)

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.

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.

Notification: (unchanged)

Board Recommendations: None

Committee Participants

Full Committee Members: Linda Morrison, Nancy Thiex, Dave Edwards, Scott Ziehr, Jennifer Godwin, Erin Bubb, Doug Lueders, Brenda Snodgrass,* Ken Bowers, Chad Linton, Mark LeBlanc,

Kent Kitade, **Ali Kashani**, Eric Nelson, **Ashlee-Rose Ferguson*** (Board Liaison), **Richard Ten Eyck** (BIN Coach), **Stan Cook, Vice Chairperson**
Committee Advisors: Dave Fairfield, Roger Hoestenbach, Bob Ehart, **Leah Wilkinson,*** Nancy K. Cook, Kristi Krafka, Julia Fidenzio
By-Laws Sub-Committee: Ken Bowers, Erin Bubb, Doug Lueders, Richard Ten Eyck
Bold indicates the person was present.
***The person was present virtually.**

Committee Reports

1. Strategic Planning 2017-2020
 - Key progress is recorded in Appendix 3: Strategic Plan 2017–2020(2022), updates from Annual 2022. Edits are in bold, italic text.
2. Strategic Planning 2023-25 - Update
 - Priority Goals and Objectives have been identified to better align with the updated Vision and Mission Statement;
 - Task activities, deliverables and responsibilities were drafted at Seminar 2022. Finalization is expected fall 2022 for presentation to the Board by the end of the year. Once approved the 2023-2025 Strategic plan will be presented to members.
3. Procedures Manual
 - a. Privacy Policy
 - 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.
 - First draft developed with assistance from FASS and legal. Counsel provided suggestions to bring it into compliance with GDPR; FASS have also commented.
 - Work Group: Erin, Jacob (Technology Comm. Rep), Scott, FASS rep
 - Identify placement in Procedures Manual.
 - Update: 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.
 - Timeline: Anticipate document for Midyear 2023.
 - b. BOD Minutes Review (Appendix 1)
 - Board charge to SAC: Review the necessity of publishing the BOD minutes on the AAFCO website, while taking into consideration the updated AAFCO Privacy Policy, liability concerns of BOD members, and the language in the Official Publication that directs the placement of the BOD minutes. The Work Group should direct requests for assistance from legal counsel through the Board Executive Committee.
 - Work Group: Austin (lead), Stan, Dave, Ken, Leah

Motion to accept Work Group report (Appendix 1) - Ken, second - Ashlee-Rose. Motion carries.

Recommendation to SAC

The workgroup recommends to the Strategic Affairs Committee to edit the row ***"Post Approved Minutes"*** in **Table 4 BOD Post-Meeting Deadlines and Responsibilities** on P. 100 of the 2022 AAFCO Official Publication 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 2021 AAFCO Procedures Manual on P. 15.

Motion to accept the recommendation above - Ken, second - Dave. Motion carries.

The workgroup also requests that the Designated Representative of the Association Management Firm (DRAMF) begin capturing the business meeting items after each BOD meeting to build the business meeting agenda throughout the year and post the updated document in the appropriate upcoming meeting section (Midyear or Annual) on the AAFCO website. This document would be updated with recommendations for the membership after each BOD meeting if appropriate.

The workgroup also recommends providing training on best practices for capturing minutes for meetings for all that are taking minutes.

- Discussion: need to provide guidance on balancing information (e.g., not too much)

- Suggest that ETC handle drafting guidance and CIOC include in member toolkit. Meeting minutes template should be stored in Bin Library.
- c. Life Member privileges (Appendix 2)
 - Board charge: Examine the life membership nomination process and procedures to specifically focus on conflict of interest and make recommendations to changes to the By-Laws and Procedures Manual and any subsequent procedures.
 - Need to consider modifications to Life Member privileges where the Life Member is engaged by and representing regulated industry at meetings. Considerations for modification should include the By-Laws, Official Publication and Procedures Manual.
 - Background: An AAFCO Life Member has been asked to be an Advisor. Given the information that AAFCO Life Members are privy to, this could potentially be a Conflict of Interest. A potential solution could be suspension of Life Membership privileges while serving as a Committee Advisor. Another consideration is requiring the completion of an annual Conflict of Interest Affidavit for continued Life Member privileges. If a Life Member becomes an Advisor, Feed BIN access, voting in Committee Meetings, complimentary meeting registrations must all be considered. Additional language may be required in the Life Membership award letter to help clarify AAFCO's expectations of Life Members.
 - Work Group: Erin (lead), Doug, Eric

Motion to accept Work Group report (Appendix 2) - Stan, second - Dave. Motion carries.

Excerpt from the OP with suggested changes (Guidelines, Page 106, 2022 Hard copy of OP):

(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 determine by the AAFCO BOD to be equivalent of these criteria:

3. 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.
4. 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.

Nomination Procedure: (unchanged)

Assessment of Life Membership Nomination: (unchanged)

Pause of Benefits: (new language)

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.

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.

Notification: (unchanged)

Motion to accept the recommendation above - Ashlee-Rose, second - Ken. Motion carries.

4. Deferred Business
 - a. Update/clarify Procedures Manual including linkage with By-Laws and Official Publication (expanded from Secretary-Treasurer description update)
 - A fulsome discussion raised the relationship between By-Laws, Official Publication (OP) and Procedures Manual (PM). There is a need for a better understanding and consequently clarification. The WG will:
 - focus on defining what information is maintained in each of the three. Reduction in overlap and duplication is a goal. 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)

- Comprehensive By-Laws legal review ~7yrs ago.
 - Secretary-Treasurer (ST) needs more work; legal review which yielded options; need to address level of detail in By-Laws versus elaboration of duties in ST PM description; discussion expanded to include review of ED and Association Management Firm; restage WG function to consider review of all linkages with ST duties;
 - WG adjusted: Ashlee-Rose, Kent, By-Laws SC, Linda, Stan
 - Update: Delayed due to other priorities
 - Timing: Draft plan by Midyear 2023 with goal of finalization Annual 2023
- b. Resolutions Policy
- Resolutions Policy was accepted in August 2022.
 - Develop guidance on drafting resolutions (WG) and implementation recommendations (CIOC/Philosophy?)
 - WG: Stan, Erin (lead), Hollis, Ashlee-Rose
 - Update: Have not met
 - Timeline: Midyear 2023
- c. Common Food Index
- Update: Procedures and Guidelines passed through IDC this meeting and will go to Board with recommendations for placement in Chapter 5 of OP together. Next step will be to develop AAFCO.org portal. No action anticipated for SAC.
5. Other Business
- SAC Bin coach change to George Ferguson
- Motion to accept August 6, 2022 Midyear SAC meeting report with minor grammar edits - Stan, second - Dave. Motion carries.**

Action Item Table

Responsible	Item	Action	Timing / Status
WG: Ashlee-Rose, Kent, + By-Laws Sub Committee, 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
WG: Austin (lead), Stan, Dave, Ken, Leah	Board Minutes availability	Review the necessity of publishing the BOD minutes on the AAFCO website	Complete
WG: Erin (lead), Doug, Eric	Life Member privileges	Examine life membership nomination process and procedures to specifically focus on conflict of interest	Complete

Appendix 1

Board Minutes Review Working Group

Workgroup Members: Austin Therrell, Leah Wilkinson, Stan Cook, Dave Edwards, Ken Bowers
Charge

The AAFCO BOD moves to charge the Strategic Affairs Committee to review the necessity of publishing the BOD minutes on the AAFCO website, while taking into consideration the updated AAFCO Privacy Policy, liability concerns of BOD members, and the language in the Official Publication that directs the placement of the BOD minutes. The Workgroup should direct requests for assistance from legal counsel to the executive committee.

Background

BOD minutes were taken down in July of 2021

Why? – Concerns with documents being used outside of their intended purpose

Call #1 – (2/2/22)

- Bylaws – post to membership - ok
- Committee guidelines – post to AAFCO website – conflicting with procedures manual
- Procedure's manual – post to Feed Bin - ok
- Remove names from minutes? – Need more training
- Build the business meeting agenda throughout the year and post to next meeting page

Recommendation to SAC

The workgroup recommends to the Strategic Affairs Committee to edit the row ***“Post Approved Minutes”*** in **Table 4 BOD Post-Meeting Deadlines and Responsibilities** on P. 100 of the 2022 AAFCO Official Publication 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 2021 AAFCO Procedures Manual on P. 15.

The workgroup also requests that the Designated Representative of the Association Management Firm (DRAMF) begin capturing the business meeting items after each BOD meeting to build the business meeting agenda throughout the year and post the updated document in the appropriate upcoming meeting section (Midyear or Annual) on the AAFCO website. This document would be updated with recommendations for the membership after each BOD meeting if appropriate.

The workgroup also recommends providing training on best practices for capturing minutes for meetings for all that are taking minutes.

Appendix 2

Life Member Privileges Working Group Report June 16, 2022

Workgroup Members: Erin Bubb, Eric Nelson and Doug Lueders

The working group drafted some proposed language in the guidelines for Life Membership found in the OP. This will hopefully assist the association with some guidance when a Life Member chooses to represent industry or other external stakeholders outside of the public official credentials they once held. We also decided it could be handled well enough in the guidelines so the By-Laws would not have to be modified. We agreed that changes to by-laws should be minimum and limited to just those that are absolutely necessary.

Excerpt from the OP with suggested changes (Guidelines, Page 106, 2022 Hard copy of OP):

(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 determine by the AAFCO BOD to be equivalent of these criteria:

5. 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.
6. 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.

Nomination Procedure: (unchanged)

Assessment of Life Membership Nomination: (unchanged)

Pause of Benefits: (new language)

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.

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.

Notification: (unchanged)

Appendix 3: Strategic Planning 2017–2020(2022)

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

* Top 3 priority goals

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

*** Board priority action completed February 2018

Top 3 Priority Goals [FSMA TF activities integrated] (*Final updated text: italics/bold*)

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

Outcome	Activity	Resources Needed	Timeline	Responsible
Strategy: Emphasize feed and food safety				
Goal 12: Promote and support laboratory technology, methods, quality systems and collaboration				
12.1 ** Fund AOAC method development and validation	Review list, remove those that aren't relevant and prioritize the remainders. Identify resources to clear out analytical method needs backlog. Use existing strategy to identify method needs and prioritize them to continuously identify new needs (includes sample preparation)	Funds People	<p>Methods needs survey completed (pathogens and vitamins top). General priority list established. Vitamin and mineral workgroup in progress and have some funding requests. Mycotoxin methods are well established and most labs analyze with no method needs work to be done. CTC/OTC working group is validating HPLC and LCMS method. Vitamins remain as the most needed AOAC method development. Pathogens analyses are well established AOAC methods (no need here). Will require review of the methods list together with the hazard list to reprioritize. See survey summary sent by Nancy Thiex 2019.10.28.</p> <p>Need to identify resources to address backlog thereafter.</p> <p>3–5 years to address backlog.</p> <p>August 2018: Sugars and fructans methods submitted for ERP at AOAC; FDA hazard guidance published January 23, 2018 insufficient for use. Basic FDA guidance available late 2019 to Contract inspection states. Working with FFIMC (12.2) (WG: Eric, Sharon, Kristi, Josh, Jenny, Nancy) to develop annual state survey to prioritize and select hazards to advance method development. Survey sent to regulators Dec. 2020. Results presented by J. Arbaugh and E. Brady at LMSC. Results available through LMSC. Identified toxic metal, microbial pathogen, toxins, vitamins, drug (medicating and residue level) and pesticides. Next step was to identify gaps in labs and potential causes of capabilities (identify equipment needs, matrix extension work, new method validation, future training opportunities and best practice guidance).</p> <p>August 2021: Results from the State Agriculture Laboratory Capability survey were received, compiled and presented at LMSC. LMSC formed new working groups for the hazards identified and created tables with an outline of each new working group, the lead and volunteers. LMSC members/advisors were contacted asking for volunteers. This will be an ongoing process. The LMSC will be starting work on drafting a Method Needs Statement for Vitamin D.</p> <p>Since hazards change, LMSC plans to send an annual survey to regulators in order to capture new hazards or other analytical compounds of interest and adjustment method development as appropriate.</p> <p>Complete</p>	LMSC with ISC support
Combined with 12.3 (below)	Identify resources to perform additional (field) sample collection studies	Funds Equipment People	<p>6 months to identify resources</p> <p>1 year to develop adequate protocols</p> <p>3 years to perform additional sample collection studies</p>	<p>1-ISC</p> <p>2-LMSC</p>

Outcome	Activity	Resources Needed	Timeline	Responsible
12.2 *** FSMA TF Item 3: priority setting and method development for contaminants/ hazards (Combined with activity 9.2 in FFIMC WG)	Determine the contaminants, hazards, matrix and action levels to provide guidance to LMSC to inform method development. Integrate collaboratively into current LMSC priorities	Subject matter experts Funds Equipment	<p>Alliance decided not to develop specific hazard guidance information. FDA assumed the work and published hazard guidance January 23, 2018.</p> <p>Next steps: complete method needs statement for LMSC.</p> <p>Up to 3 years for subsequent method development and validation (dependent on whether there is existing method). Bob Waltz is lead (including LMSC representation).</p> <p>August 2018: WG report - FDA guidance doesn't contain a hazard specific list or action levels. Levels are critical to inform method development. Basic FDA guidance available late 2019 to Contract inspection states. Group will deliberate refocusing to identify what can be done (e.g. identify hazards from those suggested that are higher risk (toxicity/likelihood/impact) for which levels were used for regulatory action in prior incidents. Once guiding principles established, WG could transition to Sub-Committee to formally interface with LMSC to guide ongoing method needs (new or improved).</p> <p>January 2020, Lead Eric Brady formed WG (Austin, Jenny, Josh, Kristi, Sharon, Nancy) and organized call to review 2019 (Thiex) lab survey did around all methods and states needs to align understanding. Will develop another survey of states to identify most important hazards, obtain consensus on top 10 for LMSC to develop/validate methods. Survey sent to regulators Dec. 2020. Results presented by J. Arbaugh and E. Brady at LMSC.</p> <p>August 2021: See 12.1</p> <p>Complete</p>	FFIMC lead, EIC, ISC, IDC and LMSC

Outcome	Activity	Resources Needed	Timeline	Responsible
12.3 ** Validation of sampling methods	a) Perform field sampling method validation including sampling equipment and sample type. b) Establish sampling methods needs statement (Complete). Identify resources and develop adequate protocols to perform additional (field) sample collection studies.	Funds Equipment People Time	a) Activities: needs statement, RFP, contract, evaluation. Expect it will take 2 years. b) 6 months to establish sampling method needs statement. 6 months to identify resources 1 year to develop adequate protocols. 5 years to perform sampling method validation. Will flow from 1.1 Complete June 2018: Laboratory sampling guideline. Work group established (ISC and LMSC reps) to develop RFP. August-December 2018: RFP developed and issued. Starting with bag/probe sampling and several types of feed (particle sizes), analytes (e.g. protein, fat, fiber, Ca, P, Zn) under consideration need to include high, middle and low concentration as well as residue levels; consulted with Andy to address statistical validity. Three proposals received mid 2019 and assessed. Two proposals successful; moving forward with contract with UK; second proposal exceeds budget and may not be needed if UK study suffices. January 2021: UK Preliminary report presented. Report available through ISC. August 2021: Data analysis for publication and presentation at LMSC in progress August 2022: No further updates	ISC with LMSC support
12.4 ** Collaboration between feed programs and laboratories that perform feed sample analysis and laboratory participation in AAFCO	Encourage participation and attendance by state labs by programs and encourage communication between labs/programs. Reach out to states to encourage laboratory participation (letter/email) in AAFCO.	Time People	November 2017: Letter from President (Ken) to state Directors/Commissioners. LMSC WG for outreach to states and federal laboratories that are not attending to work on increasing participation (especially AFRPS). August 2018: Ongoing effort by LMSC to develop initiatives to increase collaboration. Complete	AAFCO Board (President) LMSC EIC

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

Outcome	Activity	Resources Needed	Timeline	Responsible
Strategy: Promote and enhance membership participation (internal)				
Goal 9: Enhance collaboration, communication and cooperation among regulatory agencies				
9.1 ** Share compliance letters/enforcement actions. Coordination of enforcement action.	Categorize Listserv topics to Feed BIN Being done as part of Food Shield (next item)	Administrative support Feed Bin	Archive Listserv is searchable. Categorization of active Listserv North Carolina also has a "mini" Listserv. It is informal, but has national data. Membership for regulators is vetted in order to control access. Made a component of item below.	EIC to designate lead with FASS support Jennifer
	Share compliance letters and enforcement actions (State and Federal)	Guidance from subject matter experts	Call January 2018: Need searchable and secure IT solution; can be done fairly easily and quickly according to Food Shield IT expert. Confidential company info release could be an issue for states. August 2018: WG, Surveyed 700 members, 44 responded (6%) regarding needs. RFP developed and sent to 4 companies. Three responded with proposals. WG turnover necessitated change in members. George Ferguson, Erin Bubb and Richard Ten Eyck reviewed the 3 proposals and made recommendation to EIC. Food Shield proposal accepted and Board approved proceeding. Search features are being adjusted. Expect to be functional within 6 months. August 2019 demo stage. January 2020: Communication challenges finalizing. January 2022: Site is up and working, but the final requests made of FoodShield have not been completed. The site is available and useable, just a little clunky at this time. August 2022: No further updates	EIC to designate lead with FASS support
	Share Division of Animal Feed letters Being done as part of Food Shield (item above)		Made a component of item above.	EIC to designate lead and coordinate with FDA as necessary; FASS to support
	Enforcement Issues Committee can pick up topics – coordinate and enhance committee action		No action due to lack of members willing to lead. 2020: New leadership seeking additional members and developing ideas/suggestions for coordinated enforcement activities August 2021: Considering developing criteria for identifying, coordinating and documenting coordinated events August 2022: No further updates	EIC to designate lead with FASS support – Members

Outcome	Activity	Resources Needed	Timeline	Responsible
	Consider development of core report (similar to that of FDA (Pet Net, Animal Net) (frequency to be determined)	Listserv EIC IDC Any committee	January 2020: Other compliance reporting (see 9.1) and Pet Net/Livestock Net is available. Low value developing core report. Activity discontinued.	EIC to designate lead with FASS support
9.2 *** FSMA TF part of Item 3: Enforcement strategy for contaminants/ hazards (Combined with activity 12.2 in FFIMC WG)	Determine the contaminants, hazards, matrix, action levels and enforcement strategy to provide guidance to LMSC to inform method development and priority setting.		Alliance decided not to develop specific hazard guidance information. FDA has assumed the activity; work product published January 23, 2018.	FFIMC lead, EIC, ISC, IDC and LMSC
9.3 ** Enhanced use of Feed BIN	Identify activities to enhance use	Financial support	Complete January 2017 (activities detailed in Feed BIN)	CIOC
9.4 ** Coordinate with NASDA to develop a framework for state feed programs to deliver FSMA implementation	Provide data and information for NASDA grant application (AAFCO is sub-contractor) and subject matter experts to support framework development.	AAFCO subject matter experts	Grant application successful and SME identified. Framework developed and finalized late 2018. Will be tracked via grant reporting obligations. Complete 2018	NASDA-AAFCO-FDA FSMA Steering Committee (AAFCO reps: Linda, Ali, Bob W., Richard)
9.5 *** FSMA TF Item 1: Align Model Bill with needed authorities to Implement FSMA	Make recommendations to align the Model Bill with needed authorities to implement FSMA		Complete January 2017	MBRC
9.6 *** FSMA TF Item 2: Transition AAFCO GMPs to FSMA GMPs and convert AAFCO Model Feed Safety Program Plan to AFRPS	a. Develop a plan for states that have adopted AAFCO's model GMPs to transition to FSMA GMPs. b. Remove Model Feed Safety Plan from OP (archive for historical reference) and use AFRPS instead		Complete August 2016	a. FFIMC with MBRC and PFC b. FFIMC with OP section editor and Feed Safety Coordinator

Outcome	Activity	Resources Needed	Timeline	Responsible
9.7 *** FSMA TF Item 6: Develop communication plan for AAFCO specific FSMA implementation activities (See 10.1)	a. Develop an AAFCO Communication Plan to better inform b. Develop a model communication plan for states to use for outreach to regulated parties		Framework developed (activities detailed in Feed BIN). 2017 initiated biannual newsletter. Draft plan developed February 2017 included both generic and ongoing activities. August 2018: Revising to make generic. Ongoing activities will be part of CIOC regular work. Expect to finalize for Board/member approval January 2019. January 2020: Given state of FSMA implementation, a comm plan is considered too late. FSMA specific activity discontinued. Instead, a generic comm plan will be developed as part of 10.1 (9.7 integrated within).	CIOC

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

Outcome	Activity	Resources Needed	Timeline	Responsible
Strategy: Promote and enhance membership participation (internal)				
Goal 8: Develop and provide professional development and technical training opportunities in support of feed program				
8.1 ** AFRPS – draft curriculum for examples. Available training needs to meet standards	Extract all resource (training) needed to meet Standard 2 Crosswalk to IFPTI; AITS/BITS; ORAU; CVM, FEMA Identify gaps and approach land grant universities	Subject matter experts. Potential travel for non-Co-Ag contract states	Work group formed. Covers 8.1 and 8.2. Document finalized. Need mechanism to keep updated, likely via George's group. Developed training calendar in Feed BIN and been adding to calendar. Point of contact and ongoing addition - Jeff; also seeking industry input so their training can be input. WG disbanded. Complete Spring 2018: See 8.2	ETC together with ISC
8.2 ** Directory/ listing of trainings available	Once training needs and model training plan are done (above), catalogue courses and categorize as basic and advanced	FASS support	Work group formed. Covers 8.1 and 8.2. Catalogued and categorized (per vote 8.1 above). Basic/Advanced terminology means different things for AAFCO (BITS/AITS), IFPTI and potentially individual states. Decided that categorization would also contain disclaimer allowing state discretion in courses they require for their inspectors. Complete Spring 2018: See 8.1 In Feed BIN. WG disbanded. August 2018: Not on Strategic Plan, but identified via ETC. Investigating software program that could track training of AAFCO members (Learning Management System). Considered 5 firms, including Knowledge Vault who declined. Selected 2 (Litmos and DigitalChalk (also used by NGFA)) for full demonstration. Both met all needs. DigitalChalk favoured and most price effective: \$8.4K for 500 active users. Recommendation/motion approved: move forward to Board to proceed with RFP (especially the 2 firms) to acquire a system.	ETC

Outcome	Activity	Resources Needed	Timeline	Responsible
8.3 ** Model training framework	Develop model document for joint inspection (OJT – on the job training) for feed. Develop model training plan. Not “developing model training plan” per follow-up conversation with Tim W., Dan D. and Ali K.	Subject matter experts. Potential travel for non-Co-Ag contract states	Work group formed. Drafted (3 part: policy overview, training plan (modified yearly for employee) and forms). ISC supplied material to ETC who drafted document. (Jim True interface as he is on both committees). August 2018: Comments back from ISC and incorporated, no additional comments - presented final model training manual to committee; audited against animal feed standards (2 and some of 3, as well as sampling and work planning). Recommend use and revisions thereafter. Document has been shared with the Committee throughout the process. Committee approved August 2018 and Board/members accepted January 2019. Complete.	ETC (George F. lead) and ISC
8.4 *** FSMA TF Item 4: Develop training material not covered through Alliance work product	Verify if training material for feed ingredient manufacturing from the (FSPCA) Alliance meets the needs of inspectors and revise as needed and include in directory of training material	Subject matter experts. Potential travel for non-Co-Ag contract states	Evaluated the GMP inspection of feed manufacturers against feed ingredient manufacturers and feel the general manufacturing inspection training is adequate for both. 2018: Eric worked with Jenny FDA to review AITS. Some material was trialed at AITS, June 2019 and AITS was standardized. January 2021: Training reviewed with AAFCO curriculum. AITS common elements align with FDA inspection approach. Complete.	FFIMC & ISC supported by ETC
8.5 *** FSMA TF Item 5: Review and revise the Feed Inspector's Manual to support FSMA implementation	Review and revise the Feed Inspector's Manual to make sure it supports FSMA implementation	Subject matter experts. Potential travel for non-Co-Ag contract states. FASS support for publication, including printing/Feed BIN costs.	August 2019 Update: Comprehensive review by FDA and WG with FASS formatting. Approved by ISC. Complete.	ISC supported by LMSC and ETC

** Top 3 outcomes identified at May 2nd, 2016, planning session

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

Additional 2 Priority Goals

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

Outcome	Activity	Resources Needed	Timeline	Responsible
Strategy: Promote and enhance membership participation (internal)				
Goal 7: Identify opportunities to increase member agency participation - January 2021 Workplan and working groups drafted to address all of Goal 7				
7.1 Conduct survey of membership needs supplemented with direct communication	Develop survey to identify who (member and person) is not participating and why. Individuals to conduct direct communication are identified based on relationship. Develop talking points to support conversations (standard language, script, news/updates, specific asks (e.g. committee members), identify state specific needs). Group results by similar circumstances. Identify needs. Target inactive AFRPS states (talking points - how AAFCO supports AFRPS, offer CEU, offer AFRPS session at meetings). Develop recruiting strategies (What we can do for them and them for us), action plan and implement.	\$\$ for CEU courses, time at meetings	Active member list supplied by FASS for working group review. Survey developed and approved by Board to send out in February 2021. Compile and review results in March. August 2021: Engagement survey results are in, evaluated & plan being developed. January 2022: Entire project needs to be re-mapped. Insufficient responses were received - twice. Addressed again on CIOC committee call February 22, 2022 – ZERO volunteers to create a Workgroup to address this engagement survey/project. As a co-chair I believe that 7.1 needs to be a bigger project than “just a survey”. If it is treated as a typical survey, I do not believe we will acquire the results we desire. I propose that the BOD create a WG to map out (logic model) an engagement program plan that involves members from all committees. We need to define and list inputs, and specific outputs to create meaningful successful engagement. Pieces of this are being tackled by CIOC, but this committee is overcommitted and stretched thin. August 2022: No further updates	Board CIOC ED CEU specific committee ETC

Outcome	Activity	Resources Needed	Timeline	Responsible
7.2 Mentoring	Hold new member session during meeting Follow up to encourage engagement. Regionally, active states contact inactive states with news, updates and invites. Targeted scholarships. Hold meetings in states/regions with decreased participation. Support mentorship/mentor (e.g. sub-committee) to host training/workshops		Develop list of target states and person responsible. Develop list of mentors to match with mentees. Develop talking points, scholarship program and mentoring engagement plan. New member session formalized 2019-20, pairing new attendees with ambassadors. 2021: WG postponed AAFCO 101 and mentoring due to virtual meetings. August 2021: AAFCO 101 slide set now a video; AAFCO 101 & Ambassador program gearing up for January 2022 meeting. The original thoughts centered on in person meetings; COVID stalled plans. January 2022: AAFCO 101 & Ambassador program more organized and good attendance by Ambassadors at Midyear. Would like to expand the program to reach out to new attendees on a regular schedule throughout the year. August 2022: No further updates	CIOC Board
7.3 Provide events at Mid Year and Annual to inspire all member agencies to attend and participate	Events established based on membership survey and ongoing intelligence gathering. Events should consider needs of both large and small agencies (determine what these are). Design events that lead to innovation and nontraditional solutions. Increase opportunities for ideas to be heard and let them know ideas are welcome. Develop standardized documented procedure. Schedule events in the middle of the meeting versus front/back of regular meeting. Increase professionalism of meetings (Committees are prepared and actively conduct work at meetings). Offer more education/training at meeting (identify needs, consider AFRPS/new outside groups (USDA)	Speaker funding	Ongoing intelligence gathering established (e.g. post meeting evaluation, outreach to states). Needs list developed, actioned and tracked. Surveys (CIOC Engagement Survey and Midyear Exit Survey) will allow for a clearer plan to be developed. August 2021: AAFCO 101 slide set now a video; AAFCO 101 & Ambassador program gearing up for January 2022 meeting. The original thoughts centered on in person meetings. January 2022: Focus has shifted from pre-meeting events (AAFCO 101) to robust meeting content. CIOC chairs have assumed the lead role in the Event Planning Workgroup. This will allow for the integration of AAFCO specific topics to be appropriately planned, enable us to develop surveys (in conjunction with meeting planning) to capture feedback and conduct a needs assessment to prioritize and select future agenda topics. August 2022: No further updates	CIOC with technical support from relevant committees

Outcome	Activity	Resources Needed	Timeline	Responsible
7.4 Formulate and communicate positions on emerging issues (e.g., hemp, ICG) <i>(Transferred to 10.1)</i>				

Outcome	Activity	Resources Needed	Timeline	Responsible
Strategy: Promote and enhance membership participation (internal) Goal 10: Communicate and document AAFCO benefits and accomplishments				
10.1 Enhance Communication tools. Integrated 10.2, 10.3, 10.4 and 10.5 Integrated 9.7	Strengthen Current Issues and Outreach Committee Develop an AAFCO Communication Plan to better inform (from 9.7). Develop relevant talking points with cohesive message, not just listing top benefits of committees (ask at seminar, ask members what they think the bullet point messages should be. Formulate and communicate positions on emerging issues (e.g., hemp, ICG). Communicate benefits of AAFCO for Lab group (e.g. AAFCO support for ISO), success and relevance of proficiency testing program. Develop and publicize resolutions to support the AAFCO feed/food safety vision and goals. Collect case studies of AAFCO's successes and how they increased feed safety (e.g. BSE regs, botanicals, proficiency testing protocol ISO certification, ingredient definitions, early development of model regulations, good samples). Identify target audience, as message will vary. Identify delivery format (handout/pamphlet, newsletters, website, Feed BIN, social media) Develop schedule to keep Website content updated. Issue shorter newsletters more frequently (monthly). Maintain electronic list of upcoming meetings. Identify communication tools to utilize (dashboard, surveys). Facebook page: start with monthly newsletter, AAFCO press releases (increased frequency), communicates big items (consider activist comments). Consider having FASS post, someone else puts together content/format and review comments (ask COSDA for help). Consider contracting social media management firm.		Summer 2020 RFP issued to engage communications firm to address communications needs and comm plan. Proposals evaluated, firm selected and contract initiated 2021. WG established to onboard Philosophy and support contract work. August 2021: Long-term Philosophy workgroup created that will be responsible for reviewing proposed content. Building a member toolkit to strategically plan how each event, publication, announcement etc. is handled & subsequently rolled out. Communication plan is in progress with WG identifying key elements and tactics to fulfill charge. Hoping to chart activities. January 2022: AAFCO CIOC/Philosophy core leadership meets weekly, the entire WG meets at a minimum monthly and is called upon when needed. Member toolkit is being built. Communication plan is being expanded to include a new social media policy that will be presented to the Board in the near future. Timelines are in place for events of all sizes, and work is being dovetailed with FASS and the event planning workgroup. Quarterly newsletter has been proposed from content curated by CIOC/Philosophy WG members. This content will include evergreen material, emerging issue content, and state relevant topics. August 2022: No further updates	CIOC, Technology Committee? Issue specific Committee (technical input)

Outcome	Activity	Resources Needed	Timeline	Responsible
10.2 Newsletters 10.3 Website kept updated 10.4 Feed BIN	Shorter more frequent issuance (monthly), (?)			CIOC Board New Tech Committee?
10.2 Communicate individuals accomplishments (awards, recognition) directly to their supervisors/commissioners via recognition letter	Each individual supplies names and contact information for supervisor, commissioner and other important senior managers to copy. Create a capture form that aligns with recognition /award. Capture contact information from all program employees (title, role, etc.), way for person to update and verify as well as sign up for AAFCO notices by preference. Automate process to generate thank you letter to identified key member directors/commissioners after each meeting (Annual/Midyear) that promotes key successes at meeting and thanking them for supporting program employee attendance and participation.		George Ferguson offered to provide support Consider automating letter to senior management relative to members receiving awards. Work with FASS to capture data in Member profiles to automate process. August 2021: Data collection designed, proposed and MocaWorks quote approved by Board to begin work. January 2022: Completed in October of 2021. However, members were not notified of the change. At that time FASS handled emails of this type. Since our policy has now changed and we are utilizing Philosophy for writing notifications. It has been sent to Philosophy to write up and will be sent out shortly. August 2022: No further updates	CIOC
10.3 Promote ODI to feed label reviewers/generators	Encourage states to use to help industry buy in (e.g. require ODI report with label; promote industry use to generate labels pre-market (benefit is increased OP sales and revenue to improve AAFCO)		January 2021: Work with Philosophy on best way to distribute August 2021: Activities to be tackled by the Long-Term Philosophy workgroup. Key current topics took priority in the last 2 months postponing action on this particular item. January 2022: This has been moved to the top of the quarterly newsletter and social media project list. August 2022: No further updates	CIOC, Feed Labeling, Technology Committee ongoing support
10.4 How to distribute Spotlight On (Internal)	Utilize press releases/surveys Draft language for mini ListServ (Board/Kristen start) and see if picked up; if not outreach is next step).		August 2021: Activities to be tackled by the Long-Term Philosophy workgroup. January 2022: This has been moved to the top of the quarterly newsletter and social media project list. August 2022: No further updates	CIOC Pet Food, Technology Committee