Association of American Feed Control Officials

Final 03/06/2022 version 3

Ingredient Definitions Committee Report
Virtual Meeting , February 24, 2022

February 24,2022 12:00PM – 3:00PM Eastern

Recommendations to the Board and Association membership:

When needed, text is presented in appendix C . Workgroup reports are in appendix B.

1) Remove **Pennyroyal American** and **Pennyroyal European** from table 87.30 (OP page 473). And list them in section 99 as withdrawn Ingredients.

2) 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 xx/xx/xx
Remove ingredient	Pennyroyal, European		Business meeting xx/xx/xx

**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 May 2022

Association Action:

To be considered in August 2022

Recommendations not needing further Association review

Editorially remove **ferric choline citrate** from Table 90.26 **(2022 OP page 512).**

1.) Referrals to other AAFCO committees: -none-

Minutes IDC February 24, 2022

The Committee met virtually with over 180 attendees. Committee member roll call on Google Doc was Displayed by Kent Kitade. A quorum was present with 24 out of 27 voting members present including Richard Ten Eyck, Laura Scott, Kent Kitade, Charlotte Conway (FDA), Ken Bowers, Erin Bubb, Stan Cook, Dave Dressler, James Embry, Maggie Faba, Ashlee-Rose Ferguson, Jacob Fleig, Brett Groves, Falina Hutchinson, Darrell Johnson, Ali Kashani, Dan King, Mark LeBlanc, Dave Phillips, Tom Phillips Nathan Price, Kimberly Truett, George Ferguson, Jennifer Kormos CAN(no vote), Shannon Jordre (FDA)(no vote), Ashley Shaw (FDA) (no Vote), David Snell

Absent: Austin Therrell, Cory Skier, Kelli Younker,

Regulators were asked if anyone would like to join the committee. David Snell came forward.

OP Content

1. Vote to accept 1/18/22 IDC minutes. Jacob Fleig Moved to accept the 1/18/22 IDC minutes as displayed, Maggie Faba seconded. Motion Passed as displayed with noted corrections.

2. Common Food Index Procedures – Kent Kitade The motion to accept the Common Food Index Procedures and forward them to strategic affairs committee for inclusion into the AAFCO Procedures manual was made by Kent Kitade and seconded by Erin Bubb. Motion was tabled (moved by Dave Dressler and seconded by Nathan Price) until the next IDC meeting to give the committee time to review all the documents. Kent Kitade moved to table the motion again until the March 22 IDC meeting. Jacob Fleig seconded. Committee members are encouraged to provide the subcommittee comments. Brett Groves asked if CVM was onboard with the CFI. Dave Edwards responded that common foods is more of a labeling discussion and the states do more of the label review. Regulators who do label review are appropriate to be on the subcommittee. Chris with PFI asked CVM to confirm that this is not a de facto approval pathway. CVM confirmed. Motion to table until March passed.
    a.

3. Establish a feed term for "Finished Feed" -- Kimberly Truett. This item was will be presented at the next meeting. AAFCO is seeking a regulator to take on the feed Term investigator role.

4. Tom Phillips moved to editorially remove **ferric choline citrate** from Table 90.26 **(2022 OP page 512)**. Brett Groves Seconded – other intended uses as an iron source will remain in the Official Publication. CVM had reviewed the substance and determined it was not a significant source of choline. Motion Passed

5. Molasses products collective term footnote edit (2022 OP Page 375)- Jacob Fleig . This collective term is not listed in the CFR. The discussion was whether the foot note is needed or needs to be clarified.

6. Corn Gluten Meal Nomenclature – Dan King Extended discussion was held on how to change an ingredient name. This change is desired to modernize the nomenclature technically inaccurate used for the protein fraction of the corn kernel. Chair requested clarity on an implementation period if a change is recommended. Mr. King will bring the topic forward again next month or in August. IFN also needs to be removed in ODI. No action was taken.

7. Richard Ten Eyck moved to Remove two listings for "Pennyroyal" from table 87.30 (page 473). – and publish them in section 99 "withdrawn ingredients". Charlotte Conway Seconds – Richard Ten Eyck
   From CVM letter 1/27/22 DAF 21157: "In conclusion, CVM believes that the risk of Pennyroyal toxicity, and the potential severity of that toxicity, exceeds the utility of this ingredient as a flavor for use in animal food. Unless an interested party wants to submit data demonstrating target animal safety, we recommend that Pennyroyal be removed from the Flavoring Agents table in section 87.30 of the AAFCO OP." Motioned passed.

8. Discussion of AAFCO defined Ingredients and the Swine Health Protection Act – Erin Bubb After some discussion Ms. Bubb Requested a Swine Health workgroup be established. Workgroup Charge: Examine the OP 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 Erin Bubb, George Ferguson, Shannon Jordre, Tom Phillips, Kristi Smedley, Leah Wilkinson, Dave Meeker, and James Emerson.

   The committee took a brief break at this point.

9. Update on the ingredient submission workshop modules – Meagan Davis / Nathan Price The content for the online modules is developed and ready to be formatted by the instructional designer. The face to face supporting workshop is being planned for Annual 2022 or Midyear 2023.

10. Update from North American Coalition of Insect Agriculture - (Erin) Liz Koutsos, A recording of the presentation is saved in the BIN library/ ingredient definitions / Presentations to IDC Archive.

11. Hemp Update – Falina Hutchinson, MT Hemp Seed Cake was submitted in February 2021. CVM and the firm requesting the definition met in October 2021 with CVM asking for further information. The firm submitted additional information in January of 2022. CVM is currently evaluating the submission.

12. Workgroup report on sunsetting (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, Carlos G. PFI, Kristi Smedley,

Jean Hofve, NGFA Dave Fairfield, US Poultry James Emerson, Ken Bowers, Dave Edwards and Maggie Faba. – New lead (5 min) 2/24/22 still looking for leader.

13. IDC online training report – Sue Hays IDP Registration link: https://aafcolms.digitalchalk.com/learn/aafco-ingredient-definition-process-online-course-3 There are three trainings being developed by AAFCO. The IDP with the link above, the ingredient submission package and Pet Food Basic Labeling.

14. Training Needs - Richard

a. ***From ETC*** training on feed ingredients is desired, topics: new by-products, additives (CFR regulations, selenium), Refuge 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: Christi, James Emerson, AFIA,

ii. Richard Suggests: 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

Discussion on the project covered that the group might last 1- 2 years with several modules developed. Industry already has a lot of information that AAFCO can pull into a shareable format. Some industry folks volunteered to assist. Still need some regulators.

iii. Committee suggestions

b. Identify other trainings --- none identified – ask again in March.

1.

15. Budget needs (5 min)

a. St. Louis Workshop on Ingredient Submission (Nathan, ETC ____) Meagan will try to get a better SWAG to Richard ($35,000 out this year and $35,000 recovered this year)

b. Online modules Sustainable Ingredients (need lead, ETC ____) Richard will get a SWAG to Sue and Ashlee Rose. Guess 15 modules at $4000 each ($30,000 out this year, $30,000 out next year, recovered in the next 2 years)

Jacob is looking for additional help on the ODI subcommittee. – Ask again in March.

The meeting ran out of time at this point.

The next meeting will be March 22, 2022 at 11:30AM EST. Please register at this Link: https://us02web.zoom.us/webinar/register/WN_4Iw5nhJKQQ2DvF3hsVUwDA

Meeting Adjourned 3:05 PM EST

We will vote to accept the minutes during the 3/22/22 IDC meeting.

Minutes approved 3/22/22 with the following members not voting: George Ferguson, Tom Phillips, Kelli Younker, Austin Therrell, and Cory Skier

Appendix A:

Agenda not covered in the 2/24/22 meeting:

ODI Maintenance

15. ODI Subcommittee report – Jacob Fleig (5 min)

16. ODI procedures – Jacob Fleig (10 min)

17. Review ODI changes in catch-up transaction November 2021. – Jacob (5 min) (attach list)

18. Remove calcium Lignin Sulfonate from ODI. – Richard (5 min)

19. Move table 101.1 common or usual be in ODI - Nathan (5 Min)

20. Marine Products ODI placeholder Michael (5 min)

Announcements

A. Next Meetings:
   3/22/22 11:30AM -2:30PM Eastern Registration
   Link: https://us02web.zoom.us/webinar/register/WN_EHzFADDbTu6m1WRK-ad-kA

B. New Investigators:
   a. Feed Terms - TBD

C. Stale Ingredients: The following are being removed from consideration as definition requests. Please submit a new request if still desired.

a.

D. Parking Lot topics:

1. Facilitate a round table discussion on the use of hemp in animal food.
2. ICG workgroup report – not met since June 2021 -
3. NANP Subcommittee report –have not met -Ashley Shaw /Casey/Al
4. 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 quantitively consumer panel tested preferably at the same time as the PFLM changes. PFC chair clarified on 3/23/22 conversation that this should be a quantitative consumer research.
5. 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.
6. Bring tentative definitions up for review to move to official.
7. Pursue formal MSBC Definition.
8. New feed term and Total Ration.
9. New feed term Freeze-Dried.
10. Educational modules on by-product ingredients role in sustainability.

Appendix B:

Common Food Index Guidelines & Questions (for consideration 3/22/22 meeting)

AAFCO COMMON FOOD INDEX PROCEDURES (draft)

Introduction

The Common Food Index Subcommittee was established by the AAFCO Ingredient Definitions Committee (IDC) as the body to facilitate the adding new ingredients 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, qualifications if any, 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 ingredients are added to the CFI. All the ingredients in the CFI must meet the AAFCO Feed Term "Common Food" as found in the AAFCO Official Publication.

Procedures

I. Suggesting additions to CFI
   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 form on the AAFCO.org portal (the form can be found in the appendix)
   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 suggestions received through the www.AAFCO.org portal
   a. Who: The CFI Subcommittee Coordinator (with the assistance of the CFI Subcommittee)
   b. What: The responses to the questions on the form broadly establishes a profile for the suggested substance. The profile must fit the criteria set in the AAFCO Feed Term "Common Food"
   c. When: 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 be also included in the CFI Subcommittee report to IDC

III. Public Comment Period
   a. Pending additions to the CFI are posted on the AAFCO.org portal and in the Feed Bin

b. A press release targeting animal nutritionists (ARPAS), veterinarian toxicologists (ABVT), veterinarians, FDA-CVM, USDA, consumer groups, general public, affiliated publications is issued
    i. The press release should encourage animal scientists to share their professional opinion including support of inclusion into the CFI
c. Duration: minimum of 30 calendar days for stakeholders to comment
d. How: Comments are submitted through the AAFCO.org portal
e. The CFI Subcommittee should screen the comments as they are received to avoid a backlog
f. Public comments are screened as to risk, utility, and appropriateness for inclusion in the Common Food Index by the AAFCO Common Food Index Coordinator/Subcommittee
g. Suggestions that do not receive any comments will be reported to the IDC for their consideration
h. Suggestions that pass though the public comment period without issue will be listed in the CFI Subcommittee report to IDC
i. Suggestions that do not pass the screening process will also be reported to IDC
j. CFI Subcommittee shall submit their report at least 30 days prior to the next IDC meeting

IV. Acceptance of ingredients 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 to accept the recommendations for indexing with or without modifications
e. In their committee minutes IDC will recommend acceptance by the membership of the new additions to the CFI
f. New additions will be noted in the ODI Change Table found in the AAFCO Official Publication biannually

V. Removal of ingredients from the CFI
a. When: Whenever the CFI Subcommittee receives new information that raises a safety or other concerns
b. What: The CFI Subcommittee immediately alerts the IDC chair of the new information and may recommend the removal of the ingredient 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 a non-CFI list ("Regulator-only reading room" section of the Feed Bin)
g. Any interested party may appeal the decision of IDC to remove or not remove the ingredient from the CFI

VI. Appeal Process
a. Who: Any stakeholder may appeal an IDC decision regarding CFI
b. What: Actions subject to appeal
    i. IDC decision to accept or not to accept an item for inclusion in the CFI
    ii. IDC decision to remove an item from the CFI
c. How: An appeal can be submitted by completing a form on the AAFCO.org portal
d. When: Anytime after the IDC vote on the substance in question. While there is no deadline to file an appeal, it is preferred that one is filed as early as possible to avoid unnecessary or duplicative work.
e. The appeal will be discussed by the CFI Subcommittee and their recommendation shall be included in the next CFI Subcommittee report to the IDC
f. The IDC's vote on the appeal is final unless future information indicates additional discussion is warranted

Common Food Index Checklist (draft)

September 15, 2021

Common foods. 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 included in the AAFCO Common Food Index, please complete the following questionnaire. The questionnaire will help the Common Food Index Subcommittee determine if the ingredient meets the qualifications of a Common Food as described in the AAFCO definition.

Name:

Affiliation, Firm, or Consumer:
Email address:
Name of ingredient:
General description of the ingredient:

1. Is the ingredient a single ingredient and not a combination of ingredients (mixed feed)? YES or NO
2. Is the ingredient currently commercially available? YES or NO
3. Is the ingredient currently not defined by AAFCO or otherwise exists in chapter 6 of the AAFCO Official Publication? YES or NO
4. Is the ingredient currently found in human food? YES or NO
5. Is the ingredient safe for the intended use? YES or NO
6. Is the purpose of the ingredient other than providing general nutrition? YES or NO
7. Is the ingredient a refined product or a fraction of a whole ingredient? YES or NO
8. Is the ingredient a chemical compound? YES or NO
9. Is the ingredient a by-product of a food manufacturing process or of any manufacturing process? YES or NO
10. Is the ingredient distributed with a pharmaceutical or medicinal health claim? YES or NO
11. Is the ingredient safe to use by all animal species? YES or NO
    a. If not why?

Appendix C: (OP changes)

Attachment D

ODI Updates 02/24/22 (listed on page 1)