

Ingredient Definitions Committee Report Virtual Meeting, March 22, 2022

March 22, 2022 11:30AM – 2:30PM Eastern

Recommendations to the Board and Association membership:

When needed, OP text is presented in appendix A . Workgroup reports are in appendix B. ODI upload details are in appendix C.

- 1) Remove footnote a on 2022 OP April revision page 385 "The molasses collective term is not recognized by the FDA (21 CFR 501.110)."
- 2) Publish a new Official Definition 33.29 Black Soldier Fly Larvae Oil. Page 407 Delete T33.29
- 3) Publish replacement of Official Definition with T60.117(C) Dried Black Soldier Fly Larvae. Page 445 delete existing official
- 4) Publish replacement of Official Definition with T73.309 Urea formaldehyde Condensation Polymer. Page 470 –delete existing official on page 468
- 5) Make the following changes in ODI: (tentative ingredients do not go into ODI) **

ODI Action	Name	Reference	Comments
Add ingredient and	Black Soldier Fly	33.29	Business meeting
reference	Larvae Oil		xx/xx/xx
Remove ingredient	Calcium lignin		Business meeting
	sulfonate		xx/xx/xx
Add ingredient and	Hydrophobic Silica	Table 101.1	Business meeting
reference			xx/xx/xx
Add ingredient and	Polyethylene glycol	Table 101.1	Business meeting
reference	(400) dioleate		xx/xx/xx
Add ingredient	Polysorbate 60	Table 101.1	Business meeting
			xx/xx/xx
Add ingredient	Phytase	Table 101.1	Business meeting
			xx/xx/xx
Add ingredient	L-Methionine 85%	Table 101.1	Business meeting
			xx/xx/xx
Add ingredient	Canthaxanthin	Table 101.1	Business meeting
			xx/xx/xx



ODI Action	Name	Reference	Comments
Add ingredient	L-Glutamine	Table 101.1	Business meeting xx/xx/xx
Add ingredient	Saccharomyces cerevisiae expressing xylose isomerase from Piromyces sp. E2	Table 101.1	Business meeting xx/xx/xx
Add ingredient	L-methionine 90%	Table 101.1	Business meeting xx/xx/xx
Add ingredient	Dried Methylobacterium extorquens biomass	Table 101.1	Business meeting xx/xx/xx
Add ingredient	Clinoptilolite of sedimentary origin	Table 101.1	Business meeting xx/xx/xx
Add ingredient	Krill Meal	Table 101.1	Business meeting xx/xx/xx
Add ingredient	Beta-Gluconase	Table 101.1	Business meeting xx/xx/xx
Add ingredient	Dried L-threonine fermentation product	Table 101.1	Business meeting xx/xx/xx
Add ingredient	Marine microalgae oil	Table 101.1	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 -none-

Referrals to other AAFCO committees: -none-





Minutes IDC March 22, 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 23 out of 28 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, 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, Tom Phillips, Cory Skier, Kelli Younker,

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

Laura Scott indicated the need for another regulator to join the finished feed workgroup along with the investigator. Ali Kashani will be the new feed term investigator. Please email Richard if you'd like to help.

OP Content

- 1) Vote to accept 2/24/22 IDC minutes. Jacob Fleig Moved to accept the 2/24/22 IDC minutes as displayed, Mark LeBlanc seconded. Motion Passed
- 2) Common Food Index Procedures (tabled Motion)— 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."

Kent recommended to table the item again and discuss it further with the committee members. He indicated that some regulatory members had asked for additional information. PFI asked if they could provide additional input after that meeting. Additional process considerations may need to be added for frivolous requests. There is also confusion on how to handle foods with a standard of identity. Confusion surrounds the difference between single ingredients and multiple ingredient foods (cheese, peanut butter, yogurt). Chair will set up a one hour meeting with the committee.

The CFI index (draft) documents are available in the BIN/Library/ ingredient definitions/investigator recommendations.

There was no motion to take the item from the table. *The tabled motion dies.* The workgroup is welcome to make future CFI recommendations to the committee



- 3) Establish a feed term for "Finished Feed" -- Kimberly Truett (5 Min) (need form) See request from Laura Scott for additional workgroup regulatory members.
- 4) Molasses products collective term footnote edit (2022 OP Page 385)- Jacob Fleig Motion to remove footnote a. on OP page 385 "The molasses collective term is not recognized by the FDA (21 CFR 501.110)." This footnote is being removed because it has raised confusion about the acceptability of use of the collective term. Charlotte Conway moves, Brett Groves seconds, motion passes
- 5) Corn Gluten Meal (proposed) Name change Dan King Publish as Corn Protein Meal.

The committee and advisors discussed several changes concerning the use of the word "gluten" and decided more time was needed to reach consensus. The proposed changes would affect all outdated uses of the word "gluten." "Gluten" had historically been the term used to describe plant proteins generally, but today there is confusion because the protein in corn and sorghum (described here) is different than the gluten protein found in wheat. Further discussion was also needed on the implementation timeline and how the old names would be archived.

This table summarizes the proposed changes.

Existing Name	New Name 3/22/22		
48.14 Corn Gluten Meal	48.145 Corn Protein Meal		
42.2 Grain Sorghum Gluten Feed	42.25 Grain Sorghum Protein Feed		
42.3 Grain Sorghum Gluten Meal	42.35 Grain Sorghum Protein Meal		
48.13 Corn Gluten Feed	48.135 Corn Protein Feed		
48.18 Hydrolyzed Corn Protein	Name stays, changing definition		

Place a note on 48.14, 42.2, 42.3, 48.13 "Remove from the 2025 OP and place in the withdrawn section with a note "Industry nomenclature was changed from gluten to protein in 2022."

Modify the collective terms also.



Industry Associations indicated a desire to discuss this further before taking action. FDA indicated the desire to do all these changes at once.

Discussion continued on parsing out the Corn Gluten Meal change as the lightning rod for the changes. In depth extensive discussions proceeded on the logistics to making these changes.

T48.14(A) Corn Gluten meal (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, amended 2023). Remove "corn Gluten meal" in the 2025 Official Publication.

Discussion was held about whether to list corn gluten meal in the withdrawn section. Consensus was that this would not be desirable.

CVM offered that a pause until August would give them time to concur on the changes and provide a supporting letter.

No formal motion was made on the topic. Dan King will bring the expanded topic back to the committee in August.

- 6) Publish Official Definition T33.29 Black Soldier Fly Larvae Oil Mundo Motion was made by Jacob Fleig, and seconded by Falina Hutchinson. Motion passed. This is the first time the substance has been recommended to be listed as Official in the OP.
- 7) Publish Official Definition T60.117(C) Dried Black Soldier Fly Larvae Bubb & delete existing official Erin Bubb moved and Mark LeBlanc seconded. change as-fed in the text. Motion passes
- 8) Publish Official Definition T73.309 Urea formaldehyde Condensation Polymer Ten Eyck delete existing official Stan Cook moved and Ashlee-Rose seconds. Motion passes

ODI Maintenance

9)	ODI Subcommittee report – Jacob Fleig Volunteers:	
	Nothing new still looking for volunteers	

10) ODI procedures – Jacob Fleig

a. Edits from IDC go into ODI when?





Need to do actual run through of the update before writing the procedure.

- 11) Review ODI changes in catch-up transaction November 2021. Jacob (attach list)
- 12) Remove calcium Lignin Sulfonate from ODI. Richard Ken Bowers moved, Ashlee Rose Seconded. Motion passed list in the ODI change table.
- 13) Move table 101.1 common or usual be in ODI Nathan Price, Stan Cook seconded to add the common or usual names in table 101 into ODI. Motion passed. -- list in the ODI change table
- 14) Marine Products ODI placeholder -- Michael -- No discussion held,

The committee took a 10 Minute break somewhere in here.

Informational Updates

- 15) Discussion of new GFI 258 on use of tracers in animal food CVM Diego Paiva, CVM presented the new guidance. Take aways were that Type A need bluebird formulation approved by FDA if adding tracers. The tracer may not be used to quantify the drug in the type A article. Chair will post in the BIN letters provided by Micro Tracers.
- 16) Update on the ingredient submission workshop modules Nathan Price Development is proceeding and are expected to be complete by 7/1/2022. The face to face ingredient submission workshop was postponed a couple weeks after the IDC meeting. Expect it to be held at AAFCO midyear 2023.
- 17) Discussion on proper use of 9.77 _____broth _ Stan Cook _ Take aways were that the broth sources should be cooked before the canning process. Some USDA broths may not meet the protein levels specified in this definition.
- 18) Swine Health work group update (placeholder): (report out in August) -- Bubb 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.



- 19) Hemp Update Falina Hutchinson, MT FDA is still reviewing the submission from the Hemp Feed Coalition. There is a feeding trial starting in May for broilers.
- 20) 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, PFI, Kristi Smedley, Jean Hofve, NGFA Dave Fairfield, US Poultry James Emmerson, Ken Bowers, Dave Edwards and Maggie Faba. New lead needed (George will find). Ken Bowers will send out a doodle poll to start the conversation.
- 21) Training Needs Richard (Discussed in February)
 - i) *From ETC* training on feed ingredients is desired, topics: new by-products, additives (CFR regulations, selenium), Refuge regulations)
 - ii) 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:
 - iii) 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
 - iv) Committee suggestions
 - v) Identify other trainings (nothing suggested)
- 22) Budget needs (5 min) (Discussed in February)
 - i) St. Louis Workshop on Ingredient Submission (Nathan, ETC
 - ii) Online modules Sustainable Ingredients (need lead, ETC)

23) Adjourn 2:17 PMish EST

Minutes approved 5/3/2022. IDC members not voting: Laura Scott, Austin Therrell, Charlotte Conway, Dave Dressler, Falina Hutchingson, Darrel Johnson, Dave Phillips, Cory Skier, Kelli Younker, George Ferguson, David Snell



Announcements

- A. Next Meetings:
 - a. Common Food Index call 5/26/22 11AM EST
 - b. AAFCO Annual Meet August 3-4-5,
 - c. IDC August xx, 2022 in-person, St Louis, MO
- 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/Al
 - 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 quantitively consumer panel tested preferably at the same time as the PFLM changes. Stan will make sure new vitamin names get tested.
 - e. 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 guidelines are being sent from PFC to the Board and membership in August. Laura will make sure the guidelines and the feed term get in front of the Board together.
 - f. Pursue formal MSBC Definition.
 - g. New feed term Total Ration.
 - h. New feed term Freeze-Dried.
 - 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





Appendix A: (OP changes) Page 407

T33.29 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)

Page 445

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)

Delete existing 60.117 upon association approval.

Page 470

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)

Page 468: Delete existing 73.309 upon association approval.



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**

- Suggesting additions to CFI I.
 - 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
- 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?



Attachment C ODI Updates 03/22/22

IDC Meeting Date:	3/22/22	2		
	ODI Summary of Changes for OF			
Action	Ingredient Name	Reference	Comments (meeting)	
Add Reference	Hydrophobic Silica	101.1	Business meeting xx/xx/xxx	
Add Reference	Canthaxanthin	101.1	Business meeting xx/xx/xxx	
Delete synonym	Calcium lignin sulfanate	573.6	Business meeting xx/xx/xxx	
Delete synonym New Name and	Calcium lignin sulfanates	73.107	Business meeting xx/xx/xxx	
reference New Name and	Beta-gluconase	101.1	Business meeting xx/xx/xxx	
reference New Name and	Black Soldier Fly Larvae Oil Clinoptilolite of sedimentary	33.29	Business meeting xx/xx/xxx	
reference New Name and	orgin Dried L-threonine fermentation	101.1	Business meeting xx/xx/xxx	
reference New Name and	product Dried Methylobacterium	101.1	Business meeting xx/xx/xxx	
reference New Name and	extorquens biomass	101.1	Business meeting xx/xx/xxx	
reference New Name and	Krill meal	101.1	Business meeting xx/xx/xxx	
reference New Name and	L-Glutamine	101.1	Business meeting xx/xx/xxx	
reference New Name and	L-Methionine 85%	101.1	Business meeting xx/xx/xxx	
reference New Name and	L-Methionine 90%	101.1	Business meeting xx/xx/xxx	
reference New Name and	Marine microalgae oil	101.1	Business meeting xx/xx/xxx	
reference New Name and	Phytase	101.1	Business meeting xx/xx/xxx	
reference New Name and	Polyethylene glycol 400 dioleate	101.1	Business meeting xx/xx/xxx	
reference	Polysorbate 60 Saccharomyces cerevisiae	101.1	Business meeting xx/xx/xxx	
New Name and reference	expressing xylose isomerase from Piromyces sp.E2	101.1	Business meeting xx/xx/xxx	