

Association Business Meeting Agenda

2020 AAFCO Annual Meeting
Virtual
11:00 am–12:15 pm (EDT)

Meeting Access

[Full-Access Registration](#) includes the live webcast of this committee meeting. Registrants will receive their username and password along with instructions to access and use the portal 4 to 5 days in advance of August 5. [Slido](#) will be used for questions from registrants.

Complimentary live [Audio Listen-Only Access](#) (no webcast access) will be available. Instructions to access this complimentary access will be available on the AAFCO website. No access to chat or [Slido](#) will be available for listeners selecting this option. Committee members and advisors will have live microphones. Chat will be used for voting by committee members.

Committee members: Please log on 15 minutes prior to each session so the vice chair can determine quorum and we can do audio checks.

Agenda

- 1) **Convene Business Session of the Association**—Kristen Green, President
 - 1) Welcome and opening remarks
 - 2) Announcement of new life members
 - 3) Presentation of awards

- 2) **Acceptance of committee reports from:** Current Issues and Outreach, Education and Training, Feed and Feed Ingredient Manufacturing, Feed Labeling, Ingredient Definitions Committee, Ingredient Definitions eMeeting 3/4/2020, Inspection and Sampling, Laboratory Methods & Services, Model Bills and Regulations, Pet Food, Proficiency Testing, Strategic Affairs—Erin Bubb, President-Elect

(Reports are published on the AAFCO website on the Annual Meeting 2020 page, right side, under the heading “Committee Reports.”)

- 3) **Acceptance of Committee Recommendations**—Erin Bubb, President-Elect

Ingredient Definitions Jan. 22, 2020, and eMeeting Mar. 4, 2020

1) Publish in the OP a new feed term: Common or usual

Common or usual: (naming process) The common or usual name of a feed ingredient shall accurately identify or describe, in as simple and direct terms as possible, the basic nature of the ingredient or its characterizing properties. The name shall be uniform among all identical or similar ingredients and may not be confusingly similar to the name of any other ingredient that is not reasonably encompassed within the same name. Each ingredient shall be given its own common or usual name that states, in clear terms, what it is in a way that distinguishes it from other ingredients. Common or usual names of many ingredients used in animal feed are found in the Association of American Feed Control Officials’ Official Publication, Chapter 6 – Official Feed Terms and Ingredient Definitions. Some feed ingredients may be a common food; in this case the common or usual name should abide by the principles as provided in this feed term.

2) Publish in the OP a new feed term: Common food

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.

3) Publish in the OP a new tentative definition T60.117 (B) Dried Black Soldier Fly Larvae

This includes the addition of swine to the feed ingredient definition for black soldier fly larvae

T60.117 (B) 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 a 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 as a source of protein and fat consistent with good feeding practices.

4) Publish in the OP an official definition 57.167 Manganese hydroxychloride to replace the tentative one.

57.167 Manganese hydroxychloride is the reaction product of manganese oxide and hydrochloric acid at the appropriate stoichiometric ratio, having the empirical formula $Mn_2(OH)_3Cl$. The particle size must not exceed 100 microns. It must contain not less than 44% manganese and is intended to be a source of manganese for use in livestock, poultry, and companion animal diets. It must not contain more than 20% chloride, 50 ppm lead, 50 ppm arsenic, 10 ppm cadmium, and 0.5 ppm mercury.

5) Edit Table 101 to add GRAS Notification AGRN 30 Krill Meal

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)
30 (PDF – 307 pages)	Aker BioMarine Antarctic	<i>Euphausia superba</i> (krill) meal	Krill meal	To be used as a source of protein and lipid in food for adult dogs at a maximum inclusion level of 3% by weight of dry food.	Adult dogs	2/19/2019	FDA has no questions. (PDF – 4 pages)

Inspection & Sampling Committee

- 1) Publish the revisions to the AAFCO Feed Inspector's Manual for alignment with FSMA.
- 2) Publish the revisions to the AAFCO Feed Inspector's Manual pertaining to the Aseptic Sampling section of the manual.

Model Bills and Regulations Committee

- 4) Add Regulation 6(h) regarding Carriers to the Model Bill and move Statements of Uniformity Interpretation and Policy (SUIP) #17 – Carriers, to the deleted SUIP list if Regulation 6(h) is approved by the AAFCO membership (new language bold and underscored)

6(h) **Each carrier shall be listed in the ingredient statement on the label unless it meets the criteria for an incidental ingredient [21 CFR 501.100(a)(3)].**

5) Revise Model Bill Section 7. Adulteration (new language bold and underscored)

A commercial feed shall be deemed to be adulterated: (a) (1) If it bears or contains any poisonous or deleterious substance which may render it injurious to **human or animal** health; but in case the substance is not an added substance, such commercial feed shall not be considered adulterated under this subsection if the quantity of such substance in such commercial feed does not ordinarily render it injurious to **human or animal** health;

6) Revise Regulation PF3. Brand and Product Names (new language bold and underscored)

(a) **The names of the ingredient(s) used in the brand or product name or elsewhere on the product label shall appear in order of predominance by weight in the product. Names of flavors due to their varying intensity can be in any order.**

(b) The words “100%,” or “All,” or words of similar designation shall not be used in the brand or product name of a pet food or specialty pet food if the product contains more than one ingredient., ~~not including water sufficient for processing, decharacterizing agents, or trace amounts of preservatives and condiments.~~

(c) An ingredient or combination of ingredients may form part of a **brand or** product name of a pet food or specialty pet food:

(1) When the **named** ingredient(s) constitutes at least 95% of the total weight of the product. Water sufficient for processing may be excluded when calculating the percentage; however, the **named** ingredients shall constitute at least 70% of the total product weight.

(2) When any named ingredient(s) constitutes at least 25% of the **total** weight of the product, provided that:

A. Water sufficient for processing may be excluded when calculating the percentage, however, the **named** ingredient(s) shall constitute at least 10% of the total product weight; and

B. A descriptor is used with the ingredient name(s). This descriptor shall imply other ingredients are included in the product formula. Examples of descriptors include “dinner,” “platter,” “entree,” “formula,” and “recipe”; and

C. The descriptor shall be in the same size, style and color print as the ingredient names(s)

(3) When a combination of ingredients which are included in the **brand or** product name in accordance with Regulation PF3(c) **provided that:** ~~meets all of the following:~~

A. Each **named** ingredient constitutes at least 3% of **the total weight of the product** ~~the product weight~~, excluding water sufficient for processing; and

~~B. The names of the ingredients appear in the order of their respective predominance by weight in the product; and~~

B. All such ingredient names appear on the label in the same print size, font style and color print.

(d) When the name of any ingredient appears in the brand or product name of a pet food **or** specialty pet food or elsewhere on the product label and includes a descriptor such as “with” or similar designation, the named ingredient(s) must each constitute at least 3% of the product weight exclusive of water sufficient for processing. ~~If the names of more than one ingredient are shown, they shall appear in their respective order of predominance by weight in the product.~~

The 3% minimum level shall not apply to claims for nutrients, such as, but not limited to, vitamins, minerals, and fatty acids, as well as condiments. The word “with,” or similar designation, and named ingredients shall be in the same size, style, color and case print and be of no greater size than:

Panel Size	Max “With Claim” Type Size
≤5 in ²	1/8 in
>5–≤25 in ²	1/4 in
>25–≤100 in ²	3/8 in
>100–≤400 in ²	1/2 in
>400 in ²	1 in

(e) A flavor designation may be included as part of the product name or elsewhere on the label of a pet food or specialty pet food when the flavor designation meets all of the following:

- (1) The flavor designation: A. Conforms to the name of the ingredient as listed in the ingredient statement; or B. Is identified by the source of the flavor in the ingredient statement
- (2) The word “flavor” is printed in the same size type and with an equal degree of conspicuousness as the name of the flavor designation
- (3) Substantiation of the flavor designation, the flavor claim, or the ingredient source is provided upon request.

(f) Contractions or coined names referring to ingredients shall not be used in the brand name of a pet food or specialty pet food unless it is in compliance with Regulation PF3 (b), (c), or (d).

(g) When pet food or specialty pet food consists of raw milk, the words, “Raw (blank) Milk” shall appear conspicuously on the principal display panel. (Blank is to be completed by using the species of animal from which the raw milk is collected.)

7) **Revise Regulation PF5 (new language bold and underscored)**

(a) Each ingredient of a pet food or specialty pet food shall be listed in the ingredient statement as follows:

- (1) The names of all ingredients in the ingredient statement shall be shown in letters or type of the same size, style and color
- (2) The ingredients shall be listed in descending order by their predominance by weight in non-quantitative terms
- (3) Ingredients shall be listed and identified by the name and definition established by

AAFCO

(4) Any ingredient for which no name and definition have been so established shall be identified by the common or usual name of the ingredient.

(b) The ingredients “meat” or “meat by-products” shall be qualified to designate the animal from which the meat or meat by-products are derived unless the meat or meat by-products are derived from cattle, swine, sheep, goats, or any combination thereof. For example, ingredients derived from horses shall be listed as “horsemeat” or “horsemeat by-products.”

(c) Brand or trade names shall not be used in the ingredient statement.

(d) A reference to the quality, nature, form, or other attribute of an ingredient shall be allowed when the reference meets all of the following:

(1) The designation is not false or misleading

(2) The ingredient imparts a distinctive characteristic to the pet food or specialty pet food because it possesses that attribute

(3) A reference to quality or grade of the ingredient does not appear in the ingredient statement.

(e) **Any reference to the percentage of an ingredient or combination of ingredients, by symbol or word, in the brand or product name or elsewhere on a pet food or specialty food label, shall be based in relation to the total weight of all ingredients in the product.**

(1) **The names of the ingredient(s) shall appear in order of predominance by weight in the product, provided that names of flavors due to their varying intensity can be in any order.**

(2) **Where water sufficient for processing is excluded from the declared percentage, the exclusion of water shall be indicated in words juxtaposed to, the same style and color print and at least one-half the print size of the stated percentage (e.g., “95% beef exclusive of water” or “95 percent chicken and liver exclusive of water”).**

8) Revise Regulation PF7. Nutritional Adequacy and Feeding Protocols (new language bold and underscored)

(a) The label of a pet food or specialty pet food which is intended for all life stages and sizes of the pet or specialty pet may include an unqualified claim, directly or indirectly, such as “complete and balanced,” “perfect,” “scientific,” or “100% nutritious” if at least one of the following apply:

(1) The product meets the nutrient requirements for all life stages and sizes established by an AAFCO-recognized nutrient profile; or

(2) The product meets the criteria for all life stages as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol(s);

A. Unqualified claims of nutritional adequacy that include large size dogs be can substantiated by completing the appropriate protocols using large size dogs; or

B. Can be substantiated by completing the appropriate protocols using dogs less than 70 lbs. adult weight while containing no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles; or

(3) The product is a member of a product family which is nutritionally similar to a lead product which contains a combination of ingredients that has been fed to a normal animal as the sole source of nourishment in accordance with the testing procedures established by AAFCO for all life stages, provided that:

A. The nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and

B. The family product meets the criteria for all life stages; and

C. Under circumstances of reasonable doubt, the (State Control Official) may require the manufacturer to perform additional testing of the family product in order to substantiate the claim of nutritional adequacy.

(b) The label of a pet food or specialty pet food which is intended for a limited purpose (such as size of dog) or a specific life stage, but not for all life stages and sizes, may include a qualified claim such as “complete and balanced,” “perfect,” “scientific,” or “100% nutritious” when the product and claim meet all of the following:

(1) The claim is qualified with a statement of the limited purpose or specific life stage for which the product is intended or suitable, for example, “complete and balanced for puppies (or kittens).” The claim and the required qualification shall be juxtaposed on the same label panel and in the same size, style and color print; and

(2) The product meets at least one of the following:

A. The nutrient requirements for the limited purpose or specific life stage established by an AAFCO-recognized nutrient profile; or

B. The criteria for a limited purpose or a specific life stage as substantiated by completion of the appropriate AAFCO recognized animal feeding protocol(s);

i. Qualified claims of nutritional adequacy that include large size dogs can be substantiated by completing the appropriate protocols using large size dogs; or

ii. Can be substantiated by completing the appropriate protocols using dogs less than 70 lbs. adult weight while containing no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles; or

C. The requirements of a product family which is nutritionally similar to a lead product which contains a combination of ingredients which, when fed for such limited purpose, will satisfy the nutrient requirements for such limited purpose and has had its capabilities in this regard demonstrated by adequate testing, and provided that:

- i. The nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and
- ii. The family product meets the criteria for such limited purpose; and
- iii. Under circumstances of reasonable doubt, the (State Control Official) may require the manufacturer to perform additional testing for the family product to substantiate the claim of nutritional adequacy.

(c) Dog and cat food labels shall include a statement of nutritional adequacy or purpose of the product except when the dog or cat food is clearly and....

9) Language for Insertion into the Feeding Protocols (new language bold and underscored)

AAFCO Dog and Cat Food Nutrient Profiles—Introduction

The Pet Food committee recommends that the revisions to the AAFCO Dog and Cat Food Nutrient Profiles not be enforced until 12 months (1/1/2017) for new products in development and 24 months (1/1/2018) for existing products after publication of the revised AAFCO Dog and Cat Food Nutrient Profiles in the print version of the AAFCO OP

The established profiles are the “AAFCO Dog Food Nutrient Profiles” and “AAFCO Cat Food Nutrient Profiles” as the terms are applied in AAFCO model pet food regulations referring to nutritional adequacy. Under these model regulations, dog and cat foods substantiated for nutritional adequacy by reference to the AAFCO Dog and Cat Food Nutrient Profiles for a designated life stage(s) must be formulated to contain at least the minimum concentrations of nutrients specified in the Profiles, and, for some nutrients, not more than any maximum concentration listed for that specific nutrient in the Profiles as shown in this section. Products with their nutritional adequacy substantiated by AAFCO Feeding Protocols are not mandated to meet the minimum or maximum concentrations listed in the Profiles, **except for large-size dogs growth and all life stage products substantiated by the protocols using non-large size dogs must contain no more than the maximum large size breed calcium and phosphorus concentrations listed in the profiles.** Additionally, snacks, treats or products intended for intermittent or supplemental feeding only are not mandated to meet the concentrations in the Profiles unless their labeling references the Profiles.

MINIMUM FEEDING PROTOCOL FOR PROVING AN UNQUALIFIED REPRESENTATION OF NUTRITIONAL ADEQUACY FOR A DOG OR CAT FOOD

The minimum testing necessary to prove an unqualified claim for nutritional adequacy may be obtained by using the gestation/lactation and the growth protocols.

Test puppies or kittens shall receive the test diet as their sole source of nourishment, other than dam’s or queen’s milk, during lactation, weaning, and growth. Selection of puppies or kittens shall be on a statistically sound basis from each of the litters qualifying for the gestation/lactation protocol with equal sex distribution preferred. **Unqualified claims of nutritional adequacy for a product to be fed to large size dogs can be substantiated by completing the gestation/lactation and the growth protocols using large size dogs or can be substantiated by completing the gestation/lactation and the growth protocols with dogs less than 70 lbs. adult weight in which the product contains no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles.**

MINIMUM FEEDING PROTOCOL FOR PROVING A GROWTH CLAIM FOR A DOG FOOD

PUPPIES

A minimum of eight puppies from three different litters shall be required to start the test.

The test group shall have the same gender distribution as the concurrent control group. **A growth claim of nutritional adequacy for a product that includes large size dogs can be substantiated by completing the growth protocol using large size dogs or can be substantiated by completing the growth protocol using dogs less than 70 lbs. adult weight in which the product contains no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles.**

Strategic Affairs:

Recommend addition to By-Laws Article V.

Add a new section for the Executive Committee as follows:

- 1) Official Publication 2020, Page 90 Insert language below as Section 2. Move each remaining section down one.

Article V – EXECUTIVE COMMITTEE

Section 2: There shall be an Executive Committee composed of the following: The Association's President, President-Elect, Secretary/Treasurer and the immediate Past President. The Executive Director will participate as a non-voting member. The Executive Committee shall meet upon call by the President, and three (3) members of the Committee shall constitute a quorum.

Executive Committee will act on behalf of the Board of Directors for time critical decisions, or for items that do not need the attention of the full Board of Directors. They will report all decisions to the Board at the next meeting for recording in the minutes.

Recommend changing what constitutes a quorum for the AAFCO Board of Directors from three (3) to five (5)

- 1) Official Publication 2020, Page 90 Replace the language in Section 5. Quorum. with: **Five (5)** members shall constitute a quorum of any duly called regular or special meeting of the Board of Directors.

**Recommend adding language to Table 1: Committee Premeeting Deadlines and Responsibilities.
Recommend adding language to Table 3: BOD Premeeting Deadlines and Responsibilities**

- 1) Official Publication 2020, Page 95, add:

Table 1. at 40 days. Board liaison should review agenda to make sure all topics are appropriate, and all necessary topics are on the agenda.

Table 1. at 45 days. Committee draft agenda is due.

Official Publication 2020, Page 97, add:

Table 3. at 20 days. Committee liaison to review committee recommendations for alignment with Association's policies and draw attention to any outstanding problems to committee chair and the President.

Nominating Committee:

The nominating committee recommends the 2021 AAFCO Officers and Board of Directors

President: Erin Bubb, PA

Past President: Kristen Green, KY

Sec Treas: Ali Kashani, WA
President Elect: George Ferguson, NC
Director 1 Austin Therrell, SC
Director 2 Hollis Glen, CO
Director 3 Eric Brady, TN
Director 4 Joshua Arbaugh, WV
Director 5 Laura Scott, CFIA

This concludes committee and board recommendations needing membership approval.

- 1) **Credential Report: FASS**
 - Number of voting members represented
 - Number of states in attendance
 - Number of countries
 - Number of FDA representatives
 - Number of life members
 - Total meeting attendance