



Final 5/11/21 version 3

Ingredient Definitions Committee Report Midyear Meeting via Webinar

April 1, 2021 11:30AM EST – 2:30PM EST

Minutes approved by committee May 11, 2021

Video recording of the meeting is posted in the BIN at:

<https://aafco.mocaworks.com/viewasset/?eID=1905829>

Recommendations to the Board and Association membership:

When needed, text is presented in appendix A .

- 1) Publish a **tentative** definition: **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.
- 2) Add to table 101.1: **AGRN 33 Dried Methylobacterium extorquens biomass**
- 3) Add to table 101.1: **AGRN 34 Dried L-Threonine Fermentation Product**

Board Action:

To be considered in May 2021

Association Action:

To be considered in August 2021

Recommendations not needing further Association review

- a) Edit header for collective terms on OP page 368 to add a sentence so that it reads:



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Collective terms recognize a general classification of ingredient origin, which perform a similar function, but do not imply equivalent nutritional values. When a collective term is used, individual ingredients within that group cannot be listed on the label.

The control official shall be provided, upon request, the ingredients that are being used within each collective term by the manufacturer using collective terms.

The ingredient shall correspond to the descriptor and category (e.g. be made from a forage to be in the forage products collective term or be a source of protein to be in the animal protein collective term).

Referrals to other AAFCO committees:

- A. Common Food Index Recommendation 1 The workgroup recommends that AAFCO institute a SUIP to guide the development and maintenance of an index of common foods listed by their common or usual names. *(should go to MBRC)*
- B. Common Food Index Recommendation 3 The workgroup recommends that the CFI reside on the aafco.org website and be incorporated into the Online Database of Ingredients (ODI). *(technology committee to advise placement and request bids)*
- C. Common Food Index Recommendation 4 The non-defined workgroup will provide language to IDC and SAC for the AAFCO procedures manual on how to operate the index by 8/1/2021.

Minutes IDC April 1, 2021

Committee member roll call on Google Doc was Displayed by Kent Kitade. A quorum was present. Dave Dressler & Kelli Younker were absent. The chair asked if any regulators would like to join the committee. No volunteers came forward.

Bernadette Mundo, SC was introduced as the new investigator for Fats & Oils as well as Cottonseed Products.

- 1) *Hemp Update – Falina Hutchinson, MT Stated that a definition request for Hempseed cake being fed to layers has been sent to CVM. The chair opened a discussion on how to stimulate engagement in the topic. AFIA offered that several states are advancing legislation that would allow the use of hemp in animal feed. They encouraged AAFCO to continue the messaging on the need for approval. Discussion of a round table was proposed. The round table

should include information on CBD and the expansion of THC levels. University of Tennessee is hosting a Hemp meeting in May that Falina is speaking at. Erin Bubb floated the idea of hosting a discussion in conjunction with AFDO. Could AAFCO issue a resolution that could be shared with the Ag Commissioners? Bill Bookout offered that we may be past the point of no-return without enforcement actions taken at the state or federal level. The rhetoric needs to be backed up by action. Falina offered that MT is one of the states passing hemp feed legislation. The hanging question was what to do now? CVM stated the data gaps include potential for human food residues (meat, milk and eggs), bioavailability of the nutrients, as well as other potential safety questions for by-products from the extraction of CBD. Should AAFCO facilitate a round table discussion on the use of hemp in animal food? – audience overwhelming answered yes. Falina and Richard will pursue with direction from the BOD.

- 2) Publish a tentative definition: **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. Tom Phillips moved, Brett Groves seconded. Motion passed. Current definition will stay in place.
- 3) Add to table 101.1: **AGRN 33 Dried Methylobacterium extorquens biomass** Nathan Price, Moved, Tom Phillips seconded. Motion passed. It was noted that redaction of the GRAS notices by FDA is still taking several months. There are 2 more AGRN in the pipeline waiting on redaction.
- 4) Add to table 101.1: **AGRN 34 Dried L-Threonine Fermentation Product** - Nathan Price moved, Brett Groves seconded. Motion passed.
- 5) Not-Defined workgroup- **Common Food Index Proposal**, – Kent Kitade. The workgroup provided a report that was accepted by the committee. Dave Phillips moved, Jacob Fleig seconded. Motion to accept passed. The report made 4 recommendations (a-d below) centered on establishing an SUIP on how to establish and operate an index of common foods. The intent is for the index to be available to all on the aafco.org website and also be included in ODI. The workgroup will create a detailed process to be included in the AAFCO procedures manual and bring that to IDC in August.



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- a. Recommendation 1 The workgroup recommends that AAFCO institute a SUIP to guide the development and maintenance of an index of common foods listed by their common or usual names. *(should go to MBRC)*
Kent Kitade Moved, Brett Groves seconded. Motion passed. George Ferguson asked if the SUIP policies are still intended to continue. Dave Phillips offered that Doug Lueders acknowledged this was an appropriate item for an SUIP.
- b. Recommendation 2 The workgroup recommends that IDC appoint a Common Food Index (CFI) subcommittee to review and build an index of common foods.
Dave Phillips moved, Kent Kitade Seconded. Motion Passed. Chair has asked Dave Phillips, Kent Kitade, Katie Simpson and JoLynn Otero to serve. The subcommittee will begin work after annual meeting and acceptance of the SUIP and procedures. It was asked if the CFI will apply only to pet food. Common Foods are used in food for all types of animals.
- c. Recommendation 3 The workgroup recommends that the CFI reside on the aafco.org website and be incorporated into the Online Database of Ingredients (ODI). *(technology committee to advise placement and request bids)*
Jacob Fleig moved, Dave Phillips seconded to refer to technology committee for consideration and implementation. Motion passed. Laura Scott asked if technology committee needed to wait for the SUIP to pass before starting work. It's expected that the committee coordinator would monitor this. MBRC should not be making significant changes to the proposed SUIP.
- d. Recommendation 4 The non-defined workgroup will provide language to IDC and SAC for the AAFCO procedures manual on how to operate the index by 8/1/2021.
Jacob Fleig moved, Erin Bubb seconded. Motion passed.

Workgroup report is in appendix A.

- 6) MSBC Workgroup Report - Austin Therrell reported that they have held 2 calls. The group has discussed establishing an SUIP, conducting a data search in the pet food industry. Some long term pet feeding trials may provide enough data for an FDA review. A workgroup report is still expected in August. Discussion was held about historical use of the ingredient in pet food and other species.



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- 7) **90.27 (NEW Table)** Pet food parenthetical [Vitamin common name table](#) - Tom Phillips displayed a revised table and led the discussion. Consumer survey indicated that some chemical vitamin names were confusing. The proposed table 90.27 lays out optional common/familiar vitamin names for most vitamins that could be used on finished pet foods in conjunction with the ingredient names. The agreed upon names could also be added to ODI. Lots of discussion on how this would be used and if it would be mandatory. Input from several folks indicated the new format went backwards on clarity. They would prefer to have the chemical name in parenthetical. Others liked the format as displayed. Chair asked Tom to bring the table back with needed fixes at the next IDC meeting.

1PM ish ---- Brief break 5 minutes

- 8) Collective Terms Header - Jacob Fleig. Edit to section 22 (collective terms) was displayed. Ken Bowers moved, Tom Phillips seconded. Motion passed with amendment: change “should” to “shall,” “i.e.” to “e.g.” and remove last sentence.

To be added to the particular collective term, **“The product shall correspond to the descriptor and category (e.g. be made from a forage to be in the forage products collective term or be a source of protein to be in the animal protein collective term.)”**

- 9) Review use of finished feed vs complete feed in chapter 6 of the OP. Charlotte Conway reported that CVM had worked reviewed the use of these terms in both the OP and CFR. Ration and total ration are also used in definitions. Complete feed is already a defined feed term. Recommendation is to establish a feed term for “Finished Feed” and “Total Ration” to help with interpretation. This charge is passed to Kimberly Truett, Feed Term Investigator.

- 10) Workgroup report on sunseting (withdrawing) procedures for common or usual names in the OP. George Ferguson (lead), Maggie Faba, Leah Wilkinson, Kristi Smedley, By-Laws (Ken Bowers), David Edwards.

George F. reported that the workgroup has not met but he asked for clarity on the charge. This “sunseting” is when an ingredient name is needing time to expire (nomenclature change). It does not apply to the substance losing its defined status. The workgroup is also charged with making recommendations (if needed) to revising the current process to place a substance in section 99 (withdrawn).



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11) Online training module for ingredient requests. Sue Hays played module 1.

12) Omaha Ingredient Submission workshop – Meagan Davis reported this will be a virtual course and ready early September 2021. Expect about 12 modules and 7 videos. It should be about a 6 hour course. Still planning a face to face at Midyear 2022 meeting for Q/A with the experts.

13) Adjourn 2:30 EST

Announcements

- A. Next Meetings: August 2021
- B. New Investigators: Fats & Oils; Cottonseed products -- Bernadette Mundo, SC
- C. **Stale Ingredients:** The following are being removed from consideration as definition requests. Please submit a new request if still desired.
 - a. Cricket meal, pet food– Erin Bubb
 - b. Grape Pomace, fiber – Erin Bubb
- D. Parking Lot topics:
 - a. Facilitate a round table discussion on the use of hemp in animal food.
 - b. Establish a feed term for “Finished Feed” and “Total Ration.”
 - c. ICG Verification workgroup – have not met-
 - d. NANP Subcommittee report –have not met -Ashley Shaw /Casey/Al
 - e. ODI Subcommittee report – working on getting ODI changes table in front of OP –Jacob, Kelly
 - f. **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.*
 - g. Remove calcium Lignin Sulfonate from ODI.
 - h. Human Grade feed term edits accepted by IDC in January 2021 are being held in the BOD action table until the human grade guidelines are passed out of model bill committee.
 - i. MSBC recommendations – Annual meeting 2021



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Minutes approved 5/11/21 with the following members not voting: Laura Scott, Mika Alewynse, Mark LeBlanc, Kelli Younker

Appendix A for IDC 4/1/21 minutes

Non-defined Ingredients Workgroup Report

March 18, 2021

Recommendations from the Non-Defined Ingredients Workgroup

1. The workgroup recommends that AAFCO institute a SUIP to guide the development and maintenance of an index of common foods listed by their common or usual names. *(should go to MBRC)*
2. The workgroup recommends that IDC appoint a Common Food Index (CFI) subcommittee to review and build an index of common foods.
3. The workgroup recommends that the CFI reside on the aafco.org website and be incorporated into the Online Database of Ingredients (ODI). *(technology committee to advise placement and request bids)*
4. The workgroup will provide language for the AAFCO procedures manual on how to operate the index by 8/1/2021.

SUIP xx: Common Food Index

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. 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 intended for ingredients that are considered common foods that do not require a safety assessment. The CFI is not a substitute for the AAFCO process for new feed ingredient definitions; Chapter 6 of the *Official Publication*, alone, maintains 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.

The CFI subcommittee will provide a report of recommendations for modifications to the CFI to the IDC prior to each IDC meeting.

Indexing:



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IDC must accept the CFI subcommittee report for addition to the index. IDC challenges to common foods in the subcommittee report can be accomplished with a motion to strike the item(s) in the list prior to report acceptance.

The CFI may be edited immediately upon acceptance of the IDC meeting minutes by the AAFCO Board of Directors (BOD). No further action by the BOD or membership acceptance is required.

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

Note:

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

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)
33 (PDF – 64 pages)	KnipBio Inc.	Dried Methylobacterium extorquens biomass	Dried Methylobacterium extorquens biomass	To be used as a source of protein in food for aquaculture crustacean species at a level up to 6% of the diet.	Crustacean species	9/20/19	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)
34 (PDF – 494 pages)	CJ CheilJedang Corporation	Dried L- Threonine Fermentation Product (≥75% L- Threonine) produced by bioengineered Cornybacterium glutamicum	Dried L- Threonine Fermentation Product	To be used as a source of the nutrient L- threonine in food for livestock and poultry	Livestock and Poultry	11/26/19	FDA has no questions. (PDF - 4 pages)