



Final, accepted 8/21/15

Ingredient Definitions Committee Report

2015 AAFCO Annual Meeting
August 4, Denver, Colorado

Committee Recommendations to Board & Membership

- 1) Move from Tentative to Official in the OP for 33.10 _____ Distillers Oil, Feed Grade.
- 2) Move from Tentative to Official in the OP for 54.33 Bovine Colostrum.
- 3) Move from Tentative to Official in the OP for 60.111 Bio Diesel Derived Glycerin.
- 4) Move from Tentative to Official in the OP for 60.113, 114, 115, 116 Pulse Definitions including Lentil language.
- 5) Publish the tentative definition in the OP for T3.2 Dehydrated Alfalfa.
- 6) Publish the tentative definition in the OP for T3.5 Direct Dehydrated Alfalfa meal or Pellet
- 7) Publish the tentative definition in the OP for T9.10 Poultry By-Product Meal
- 8) Publish the tentative definition in the OP for T9.14 Poultry By-Products.
- 9) Publish the tentative definition in the OP for T9.57 Poultry
- 10) Publish the tentative definition in the OP for T9.71 Poultry Meal.
- 11) Delete the definition of 33.5 Fat Product, Feed Grade from the OP (2015 OP page 380).
- 12) Publish the tentative definition in the OP for T60.115 (B) Pulse protein.
- 13) Publish the tentative definition in the OP for T60.116 (B) Pulse starch.
- 14) Publish the official definition in the OP for 73.400 Benzoic acid.
- 15) Publish the official definition in the OP for 87.36 Phaffia Yeast.

Board Recommendations to Membership: (Will consider in October 2015)

Association Actions: (will consider in January 2016)

Minutes of 8/4/15 meeting

Meeting convened at 1:32 PM by Chairman Ten Eyck

Announced at the end of the meeting: Plan to hold teleconference/webinar meeting at the end of August to cover the topics not covered in today's session due to limited time. All Feed Bin Users will be invited to attend. All interested are welcome to join.

The committee and advisors introduced themselves and the chair asked the gallery if any regulators would like to join the committee.

Committee Members: Richard TenEyck; Al Harrison; Ali Kashani; Brett Groves; Stan Cook; Shannon Jordre; April Hunt; Bill Burkholder; Mark LeBlanc. On-Phone: Erin Bubb; Steve Gramlich; Jacob Fleig; Mika Alewynse. **Life Member:** Kent Kitade.



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Advisors: Jonathan Goodson; Jessica Meisinger; David Meeker; Vincent Sewalt; Jason Vickers; David Ailor; Betty McPhee; Leah Wilkinson; Jan Campbell; David Dzanis; Kristi Smedley; Susan Thixton; Jean Hofve; Mollie Morrissette; James Emerson.

1) Definitions to move from tentative to official

- a. 33.10 _____ Distillers Oil, Feed Grade.
Ken Bowers moves to ACCEPT; Brett Groves seconds. MOTION PASSES
- b. 54.33 Bovine Colostrum. **Cat Marrier moves to ACCEPT; Brett Groves seconds. MOTION PASSES**
- c. 54.34 Dried Bovine Colostrum. **Cat Marrier moves to table to next meeting (requested to research change in moisture level proposed by industry representative); Mark LeBlanc seconds. MOTION to table PASSES.**
- d. 60.111 Bio Diesel Derived Glycerin. **Erin Bubb moves to ACCEPT; Brett Groves seconds. MOTION PASSES.**
- e. 60.113, 114, 115, 116 Pulse Definitions including Lentil language.
Erin Bubb moves to ACCEPT; Mark LeBlanc seconds. MOTION PASSES.
- f. 93.9 _____ Wheat Gluten
Dave Phillips moves to table to next meeting (requested based on a pending work group report) ; Brett Groves seconds. MOTION to table PASSES.

2) New Definitions, deletes or edits

- a) Motion to publish the tentative definition of: T3.2 Dehydrated Alfalfa is the aerial portion of the alfalfa plant, reasonably free of other crop plants, weeds and mold, which has been ground and dried by thermal means under controlled conditions. Its source shall consist of either suncured alfalfa hay that has been stored in bales or stacks; or suncured alfalfa hay that has been stored in bales or stacks that has been blended with fresh cut alfalfa.
Erin Bubb moves to ACCEPT; Alan Harrison seconds. MOTION PASSES.
Discussion: Definition of “dehydrated” was changed recently and suncured was excluded. This was understood by producers but not by consumers. This T3.2 now includes suncured, dehydrated or blended alfalfa. Several comments were made about whether to create independent definitions for dehydrated and suncured and there were differing viewpoints. A motion to amend the name by inserting “suncured” in the name (“Dehydrated suncured alfalfa”) was offered and ultimately taken back by the maker of the motion.
- b) Motion to publish the tentative definition of: T3.5 Direct Dehydrated Alfalfa meal or Pellet is the aerial portion of the alfalfa plant, reasonably free of other crop plants, weeds and mold, which has not been stored in bales or in stacks as suncured alfalfa hay prior to being ground and dried by thermal means under



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controlled conditions.

Erin Bubb moves to ACCEPT; Brett Groves seconds. MOTION PASSES.

- c) Motion to publish the tentative definition of: T9.10 Poultry By-Product Meal consists of the ground, rendered, clean parts of the carcass of poultry, such as necks, feet, undeveloped eggs, viscera, and whole carcasses, exclusive of added feathers, except in such amounts as might occur unavoidably in good processing practices. The label shall include guarantees for minimum crude protein, minimum crude fat, maximum calcium (Ca), and minimum phosphorus (P). The calcium (Ca) level shall not exceed the actual level of phosphorus (P) by more than 2.2 times. If the product bears a name descriptive of its kind, the name must correspond thereto. It shall be suitable for use in animal food. (Proposed 1985, Adopted 1990, Amended 2000).

Meagan Davis moves to ACCEPT with the amendment to insert “added” between “of” and “feathers”; Mark LeBlanc seconds. MOTION PASSES.

Discussion: Meagan did a considerable amount of research on these definitions and became aware that the definitions, as published in the OP, did not reflect industry practice. The intent of the tentative definitions is to correct this. It was mentioned that this ingredient is not necessarily rendered. The clarification regarding “added” feathers was made because spent hens would be included and they would not have been de-feathered. David Meeker mentioned that the new tentative definitions will work for his constituents in the rendering industry. Some consumer and pet food industry representatives mentioned that they would have liked more consultation and notice of these changes.

- d) Motion to publish the tentative definition of: T9.14 Poultry By-Products consists of non-rendered clean parts of poultry such as heads, feet, viscera, and whole carcasses, free from foreign matter except in such trace amounts as might occur unavoidably in good processing practices. If the product bears a name descriptive of its kind, the name must correspond thereto. It shall be suitable for use in animal food. (Proposed 1963, Adopted 1964, Amended 2000)

Meagan Davis moves to ACCEPT; Mark LeBlanc seconds. MOTION PASSES.

- e) Motion to publish the tentative definition of: T9.57 Poultry is the clean combination of flesh and skin with or without accompanying bone, derived from the parts or whole carcasses of slaughtered poultry, or a combination thereof, exclusive of feathers, heads, feet and viscera. If it bears a name descriptive of its kind, it must correspond thereto. If the bone has been removed, the process may be so designated by use of the appropriate feed term. It shall be suitable for use in animal food. (Proposed 1978, Adopted 1979, Amended 1995, Amended 1997)

Meagan Davis moves to ACCEPT. Brett Groves seconds. MOTION PASSES.

- f) Motion to publish the tentative definition of: T9.71 Poultry Meal is the wet rendered or dry rendered product from a combination of clean flesh and skin with or without accompanying bone, derived from the parts of whole carcasses of slaughtered poultry, or a combination thereof, exclusive of feathers, heads, feet, and viscera. The label shall include guarantees for minimum crude protein, minimum crude fat, maximum calcium (Ca), and minimum phosphorus (P). The calcium (Ca) level shall not exceed the actual level of phosphorus (P) by more than 2.2 times. If it bears a name descriptive of its kind, it must correspond thereto. It shall be suitable for use in animal food. (Proposed 1988, Adopted 1992)

Meagan Davis moves to ACCEPT; Mark LeBlanc seconds. MOTION PASSES.

Discussion: The main difference was adding the word, slaughtered. There were several comments that, for clarity, the AAFCO OP needs to include the definition of “slaughter”. The USDA definition covers poultry slaughter, relevant in this case, and consideration should be given to adding this reference in the AAFCO Official Feed Terms. Mika Alewynse (FDA) mentioned that FDA may be able to check with their regulatory counsel to see if there is an applicable definition for “slaughter” per FFCA.

- g) Motion to delete the definition of 33.5 Fat Product, Feed Grade. (2015 OP, page 380).

Ken Bowers moves to ACCEPT; Mark LeBlanc seconds. MOTION PASSES (6-Y/4-N).

(Yes votes: Jacob Fleig; Stan Cook; Shannon Jordre; April Hunt; Alan Harrison; Bill Burkholder; and No votes: Brett Groves; Steve Gramlich; Erin Bubb; Mark LeBlanc)

Discussion: This definition seems to be a dumping ground for fats that do not fit any other definition. And some fat products contain impurities unacceptable for use in animal feed. According to AFIA, there are many legitimate products sold under this definition. Tightening the current definition would be a better approach than simply eliminating it, and new language is being proposed, along with the apology that this modified definition was not available earlier. Richard Ten Eyck shared the proposed amended definition. This amended version refers to the fat being suitable for use in animal feed. Sharon Benz said that FDA had asked Industry to propose a few better definitions to cover these products and references the production methods allowed in animal/vegetable/fat ester/hydrolyzed fats/oils, as FDA does not support this catch-all definition. Eric Nelson continued that FDA believes that some companies exploit this definition, and this misuse must stop, although he does not want to bar commerce of the acceptable fat products. David Meeker shared that many renderers use this definition and that thousands of tons per week of these fats are sold and used in animal feed. In NRA’s view, those fat products sold that contain unsafe ingredients is an FDA enforcement issue and not a definition issue. Most



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producers are careful about the quality of the products sold into animal feed. Kristi Smedley and Jason Vickers raised the point that if this definition were to be deleted, enormous amounts of valuable nutrients would be wasted and would go into landfill, which would be an environmental issue. Jon Goodson and Jessica Meisinger added that poultry producers depend on the availability of this ingredient; without it, food prices would likely increase.

- h) Create Section 40 Human Food Processing By-products. (advisory only no committee action needed) Investigators will be sorting materials from the miscellaneous definitions into here.

- i) Motion was made to make a minor edit of

60.96 Food Processing Waste is composed of any and all animal and vegetable products from basic food processing or distribution. This may include manufacturing, or processing waste, cannery residue, production over-run, and otherwise un-saleable material. The guaranteed analysis shall include the maximum moisture, unless the product is dried by artificial means to less than 12% moisture and designated as "Dehydrated Food Processing Waste." If part of the grease and fat is removed, it must be designated as "Degreased".

Dan Danielson moves to ACCEPT; Brett Groves seconds. MOTION Failed.

Discussion: Food waste from grocery stores and other distribution centers are being used in animal feed. Thirty states have affirmed this use; many suggesting this is the best definition for these products. Sharon Benz explained that FDA does not support this change since the name of this ingredient is very broad and FDA did not agree to the definition edit. Therefore if AAFCO were to amend the definition, it would be a breach of the MOU and would require arbitration. Mr. Danielson noted that he had provided the change to FDA for their review, and Dr. Benz indicated that they did not complete their review of the request. Industry, Consumers and Advisors expressed concerns about what exactly is included in this definition. Concern was mentioned on if this ingredient contained packaging debris such as plastics. Responding to the issues raised, Mr. Danielson offered to form a Working Group to propose a further amended definition to permit this material to be used in animal feed. The Human Food By-Product workgroup was formed. Lead is Dan Danielson. They will look for alternative definitions or language and report back in January 2016 to IDC.

- j) The motion was made to publish the tentative definition: **T60.115 (B) Pulse protein** is the protein fraction of pulse seeds. It is obtained from mechanically



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dehulled, dry milled pulse seeds, that are further separated through air classification or the addition of water, acid and alkali. The ingredient may be obtained from pulse seed separated by dry separation, wet separation or both. Pulse crops include the edible seeds of legumes (excluding oil seeds). Acceptable pulse crops are listed below. The ingredient must contain not less than 53 % crude protein on a dry matter basis and a label shall include a guarantee for minimum crude protein. If a conditioning agent is used, the name of the conditioning agent must be shown as an added ingredient. If the ingredient bears a name descriptive of its kind or origin, it must correspond thereto.

- i. Accepted pulse crops:
- ii. IFN 05-17-726 – Pea (*Pisum sativum* L.)
- iii. Lentil (*Lens culinaris*)

Erin Bubb moves to ACCEPT; Brett Groves seconds. MOTION PASSES.

Discussion: Erin explained that this definition contains the new wet separation process, as supported by Roquette and concurred by FDA. The proposal combines the definition of the wet-processed and dry-milled process definitions. In written comment, AGT Foods objected to the inclusion of both the dry milling and wet-processing in the same definition, as they consider the processing had the potential to modify the nutrient content and result in different potential contaminants. Leah Wilkinson asked if lentils were reviewed for both wet and dry processing, and Charlotte Conway explained that the stated processes were reviewed, but the review was not crop-specific. Addition of other pulse crops will be based on the safety of the crop, not on the processing. The accepted pulses were addressed to enable confidence of safety of the ingredient for animals. Additional pulse crops may or may not have safety concerns. Amy Fratus (Roquette) pointed out that every company has different hazard analyses in their HACCP Plans. The pulse protein produced by different processes has a similar amino acid profile, and so a similar protein is being fed to the animal irrespective of process.

- k) The motion was made to publish the tentative definition: **T60.116 (B) Pulse starch is the fraction remaining after removal of protein and fiber from pulse seeds. It is obtained from mechanically dehulled, dry milled pulse seeds that are further separated through air classification or through the addition of water. The ingredient may be obtained from pulse seed separated by dry separation, wet separation or both. Pulse crops include the edible seeds of legumes (excluding oil seeds). Acceptable pulse crops are listed below. The product must contain not less than 65% dietary starch on a dry matter basis and the label shall include a guarantee for minimum dietary starch. If a conditioning agent is used, the name of the conditioning agent must be shown on the product label as an added ingredient. If the ingredient bears a name descriptive of its kind or origin, it must correspond thereto.**



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- i. *Accepted pulse crops:*
- ii. *IFN 05-17-726 – Pea (*Pisum sativum* L.)*
- iii. Lentil (*Lens culinaris*)

Erin Bubb moves to ACCEPT; Brett Groves seconds. MOTION PASSES.

Discussion: An industry speaker advised that a limit of not less than 60% dietary starch would be more representative of this ingredient. Charlotte Conway informed IDC that this is under review. FDA is fine with including separate definitions for wet-milled and dry-milled products if this would be clearer for industry. The Roquette submitted process is not wet milling. These are not modifications to the starch or the protein. Both wet-milled and dry-milled products will fit this ingredient definition.

- l) **The motion was made to publish the official definition of: 73.400 Benzoic acid.** - The food additive, benzoic acid, may be safely used in the manufacture of complete swine feeds in accordance with the following prescribed conditions:
 - (a) The additive is used or intended for use as a feed acidifying agent, to lower the pH, in complete swine feeds at levels not to exceed 0.5 percent of the complete feed.
 - (b) The additive consists of not less than 99.5 percent benzoic acid (CAS 65-85-0) by weight with the sum of 2-methylbiphenyl, 3-methylbiphenyl, 4-methylbiphenyl, benzyl benzoate, and isomers of dimethylbiphenyl not to exceed 0.01 percent by weight.
 - (c) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act and paragraph (b) of this section, the label and labeling shall contain:
 - (1) The name of the additive.
 - (2) Adequate directions for use including a statement that benzoic acid must be uniformly applied and thoroughly mixed into complete swine feeds and that the complete swine feeds so treated shall be labeled as containing benzoic acid.
 - (3) Appropriate warnings and safety precautions concerning benzoic acid.
 - (4) A warning statement identifying benzoic acid as a possible irritant.
 - (5) Information about emergency aid in case of accidental exposure.
 - (6) Contact address and telephone number for reporting adverse reactions or to request a copy of the Material Safety Data Sheet (MSDS). Show citation box.
 - ii. (Proposed 2015) 21 CFR 573.210

(d) Richard Ten Eyck moves to ACCEPT; Mark LeBlanc seconds. MOTION PASSES.

- m) The motion was made to table the following tentative definition to the January 2016



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meeting. The concerns were that, since Glucose Syrup is a standardized ingredient, would it be an unwarranted precedent to add it to the OP, and if it is included, it should not be in conflict with the current regulation. :

T87.35 Glucose syrup is the purified, concentrated, aqueous solution of nutritive saccharides obtained from edible starch. It shall meet the following specifications: total solids content not less than 70.0 percent mass/mass (m/m) and reducing sugar content (dextrose equivalent), expressed as D-glucose, not less than 20.0 percent m/m calculated on a dry basis. The sulfated ash content is not more than 1.0 % m/m (calculated on a dry basis) and the sulfur dioxide content is not more than 40 mg/kg. When derived from corn, wheat, rice, sorghum or tapioca, the name of the starch will replace the word, glucose. (21 CFR 168.120).

Richard Ten Eyck moves to ACCEPT tabling this tentative definition; Brett Groves seconds. MOTION to table PASSES. Mika will look at Canadian definition and the FDA food standard of identity and report back to IDC midyear meeting 2016.

- n) The motion was made to publish the Official definition: **87.36 Phaffia yeast** – The color additive, phaffia yeast, may be safely used in the manufacture of salmonid fish feed in accordance with the following prescribed conditions:
- (a) Identity.
 - i. The color additive phaffia yeast consists of the killed, dried cells of a nonpathogenic and nontoxicogenic strain of the yeast phaffia rhodozyma.
 - ii. Phaffia yeast may be added to the fish feed only as a component of a stabilized color additive mixture. Color additive mixtures for fish feed use made with phaffia yeast may contain only those diluents that are suitable and are listed in this subpart as safe for use in color additive mixtures for coloring foods.
 - (b) Specifications. Phaffia yeast shall conform to the following specifications and shall be free from impurities other than those named to the extent that such impurities may be avoided by good manufacturing practice:
 - i. Physical state, solid.
 - ii. Lead, not more than 5 parts per million.
 - iii. Arsenic, not more than 2 parts per million.
 - iv. Mercury, not more than 1 part per million.
 - v. Heavy metals (as lead), not more than 10 parts per million.
 - vi. Astaxanthin, not less than 0.4 percent.
 - (c) Uses and restrictions. Phaffia yeast may be safely used in the feed of salmonid fish in accordance with the following prescribed conditions:
 - (1) The color additive is used to enhance the pink to orange-red color of the flesh of salmonid fish.
 - (2) The quantity of astaxanthin in finished feed, from phaffia yeast when used alone or in combination with other astaxanthin color



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additive sources listed in part 73 of Title 21 of the Code of Federal Regulations (21 CFR 73), shall not exceed 80 milligrams per kilogram (72 grams per ton) of finished feed.

(d) Labeling requirements.

- (1) The labeling of the color additive and any premixes prepared there from shall bear expiration dates for the sealed and open container (established through generally accepted stability testing methods), other information required by 21 CFR 70.25, and adequate directions to prepare a final product complying with the limitations prescribed in paragraph (c) of this section.
- (2) The presence of the color additive in finished fish feed prepared according to paragraph (c) of this section shall be declared in accordance with 21 CFR 501.4.
- (3) The presence of the color additive in salmonid fish that have been fed feeds containing phaffia yeast shall be declared in accordance with 21 CFR 101.22(b), (c), and (k)(2) and 21 CFR 101.100(a)(2).

(e) Exemption from certification. Certification of this color additive is not necessary for the protection of the public health, and therefore batches thereof are exempt from the certification requirements of section 721(c) of the Federal Food, Drug, and Cosmetic Act.

- i. (Proposed 2015) 21 CFR 73.355

Richard Ten Eyck moves to ACCEPT; Mark LeBlanc seconds. MOTION PASSES.

Discussion Topics:

a) CVM update on ingredient standards –CVM

Sharon Benz updated the IDC on the FDAAA requirement for the Agency to set ingredient standards for pet food and animal food ingredients. She said that FDA will accept the Ingredient Standards and Definitions from AAFCO Official Publication for those specific ingredients that the Agency has determined are Food Additives or GRAS substances. FDA will continue its process to conduct research to seek to sort the remaining OP ingredients into GRAS or as Food Additives. This will be an ongoing process. They will publish a regulation about this process in the future.

Another regulation will be issued in the future to state that all AAFCO submissions will be treated as Food Additive Petitions.

b) The following Definition Requests are stale. The submitting firm needs to respond to the indicated investigator by 8/3/15 or the request will be removed without prejudice from investigator consideration. CVM has asked the firm for more information 2 years ago or more, and has not received a response. The firm will need to send a new request package with all information if they want to pursue the



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listing after 8/3/15.

- a. Camelina meal for dairy cattle (Bob)
- b. Algae Meal (Chorella) as Omega 3 source (Erin)

The IDC ran out of time for the remaining topics. Chair Ten Eyck informed the IDC that there will be a webinar scheduled for the end of August 2015 to cover these topics. All interested should register with the Feed BIN and join the ingredient definitions team in order to receive the invitation to attend.

c) Remaining Discussions:

- a) Hemp Industry Feed Ingredients – Educational Presentation Requested - Ali 3 definitions had been proposed. CVM indicated during the investigator meeting that there are health concerns and the definitions were removed from the meeting agenda.
- b) States Doing GRAS determinations. Bring into OP? – Richard / Ali
- c) How do definitions get reflected in pet food company ingredient purchasing specifications – ?
- d) Preview and discuss Editing 30.1 Enzymes tables – (Jan)
- e) What does “Feed Grade” mean? – group discussion
 - a. CVM – The substance is of an appropriate grade and suitable purity and is prepared and handled as an animal food ingredient.
- f) Canadian use of the monographs –Kent /Judy Thompson
- g) Form workgroup to make 4 hour presentation in January on how to submit a definition request and other Definition Process topics. (CVM (2), Industry (3), State (2)) Kent Kitade, Richard Ten Eyck, Leah Wilkinson, Stephanie Adams, Mollie Morrisette, Susan Thixton, STATE, CVM1, CVM2, Project mgr:___

The meeting was adjourned at 4:45PM.

A webinar was held on 8/25/15 to discuss the remaining topics. A recording is posted in the feed BIN/ Ingredient Definitions Library. No votes were taken and the discussion resulted in no recommendations for membership consideration.