

AAFCO Ingredient Definitions Committee Report

October 13, 2017 Via Webinar

Recommendations to the Board and Association membership:

When needed, new text is presented in the committee minutes.

- 1) Publish the following tentative definitions as Official and remove the existing Official definition if any.
 - a) T36.14 Direct-Fed Microorganisms
 - b) T60.117 Dried Black Soldier Fly Larvae
- 2) Establish and Publish the following definitions as Official:
 - a) 33.17 Gamma-Linolenic Acid Safflower Oil
 - b) 73.045 **Pyrophyllite**
- 3) Establish and publish in the OP a new tentative definition for:
 - a) T60.117(B) Dried Black Soldier Fly Larvae
- 4) Remove Pyrophyllite from Table 73.001
- 5) IDC recommends the Enzyme Marketing Coordination Document in OP chapter 5 be moved to chapter 6 and embedded in section 30.

Board Action:

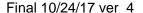
To be considered in October 2017

Association Action:

To be considered in January 2018

Committee editorial actions approved: (no association action needed)

1.) Migrate 5 definitions from section 60 to section 40





Ingredient Definitions Committee Minutes 10/13/17

Recording is posted in the BIN /Ingredient Definitions Library

1) Role Call of Committee members present (18/27 quorum was present)

Alan Harrison, Ali Kashani, Bob Church, Brett Boswell, Charlotte Conway, Dan King, Dave Phillips, David Dressler, Erin Bubb, Jennifer Kormos, Ken Bowers, Kent Kitade, Laura Scott, Mark Le Blanc, Richard Ten Eyck, Steve Gramlich, Nathan Price, Shannon Jordre (phone)

2) Investigator recommendations to move tentative to official

a.) T36.14 Direct-Fed Microorganisms – make Official Erin Bubb moves to ACCEPT. Ali Kashani seconds. MOTION PASSES.

b.) T60.117 Dried Black Soldier Fly Larvae – make Official Erin Bubb moves to ACCEPT. Mark Le Blanc seconds. MOTION PASSES.

Erin Bubb - this tentative definition should to move to official. To be recognized by states that need definitions in official status. Working on including definition T60.117 (B) that includes the mechanical extracted meal. Definition B will remove the requirements for SPECIFIC minimum protein and fat percentages, but will still require a protein and fat guaranteed analysis on the product label.

3) Work Group Reports

- a) AAFCO-Affirmed GRAS workgroup report Move to January 2018 meeting.
 - i) Group has not met. Richard Ten Eyck to meet with Enzyme Technical Association subgroup in two weeks. Searching for common ground.
- b) DFM Nomenclature Changes workgroup Move to January 2018 meeting.
 - i) Need new lead Tamzin Gonzales, NE to lead: tamzin.gonzales@nebraska.gov
 - (1) Mika's list to new lead
 - (2) Mika will still be technical resource
- c) Negative List Workgroup report Move to January 2018 meeting.
 - i) Material library exists in the BIN regulator only reading room. Discussions need to be held as to access and library organization.

4) New Definitions, deletes & edits:

a) New Feed Term "Livestock" - Ali

Ali Kashani expects to have a proposed definition for midyear meeting.



b) Salvage Livestock Feed – Ali/Geiger

Ali Kashani needs more information to further develop a definition. Richard Ten Eyck stated that Bob Geiger brought this matter to his attention. Ali Kashani recalled that Dan Danielson may have previously worked on a definition. Kent Kitade recalled this as well and offered to look into it further.

c) Common and Usual – Ali

Leah Wilkinson (AFIA) asked why this term was being worked on. Ali Kashani stated that people had been asking for it to be defined. Leah Wilkinson wondered if the Model Bill was a more appropriate place for this term. Richard Ten Eyck stated that it would likely end up in the Model Bill and in Chapter 6 Feed Terms and Ingredient Definitions. Ali Kashani requested volunteers to help develop the term. Leah Wilkinson offered to help Ali.

d) Motion: IDC recommends Enzyme Marketing Coordination Document in chapter 5 be moved to Chapter 6 Section 30

Charlotte Conway moves to ACCEPT. Steve Gramlich seconds. MOTION PASSES.

Charlotte Conway (CVM) stated that when they were looking at amending the heading in Section 30, it seemed like it would serve industry better to move the Enzyme Marketing Coordination document to Chapter 6. Lori Gregg (Novozymes) stated that the enzyme table and the Enzyme Marketing Coordination document were originally together, but later separated. Emily Helmes (Enzyme Technical Association) stated that it makes sense to have the Enzyme Marketing Coordination document with Section 30, but she would like to discuss it and the changes to the Section 30 header with the rest of the Enzyme Technical Association. Charlotte Conway (CVM) not opposed to having the edits to the header, but will need to update the references to Chapter 5 in the Section 30 header.

It was suggested to move the vote for Section 30 header edits to January to make the appropriate edits considering the move of this document.

e) Section 30 header edits – Mika. Move to accept proposed edits. Charlotte moves, Mark Seconds. After discussion.

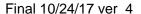
Charlotte Conway moves to TABLE consideration until the January IDC meeting. Mark LeBlanc seconds. MOTION PASSES.

- **f) 33.17 Gamma-Linolenic Acid Safflower Oil** adopt CFR Listing as Official Brett Boswell Brett Boswell moves to ACCEPT. Mark LeBlanc seconds. MOTION PASSES.
- **33.17 Gamma-linolenic acid safflower oil**-The food additive gamma-linolenic acid (all-*cis*-6,9,12-octadecatrienoic acid) (GLA) safflower oil contains an omega-6 fatty acid that may be safely used in animal food in accordance with the following conditions:
 - (a) The additive GLA safflower oil is produced in the oil obtained from whole seeds or partially dehulled seeds or both obtained from a *Carthamus tinctorius* L. safflower Centennial



variety genetically engineered to express the delta-6-desaturase gene from *Saprolegnia diclina* Humphrey. The 453 amino acid, delta-6-desaturase enzyme converts the fatty acid linoleic acid to gamma-linolenic acid during seed development. This gamma-linolenic acid safflower oil may be safely used in complete dry adult maintenance dog food as a source of gamma-linolenic acid and other omega-6 fatty acids in accordance with the following prescribed conditions:

- (1) The gamma-linolenic acid safflower oil obtained from the seeds of the genetically engineered safflower Centennial variety may be blended with oil obtained from seeds of non-engineered oleic acid safflower varieties in order to meet the specifications required for the additive or the blend in paragraph (2).
- (2) The additive or a safflower oil blend containing the additive for use in animal food meets the following specifications:
 - (i) Crude fat content of the gamma-linolenic acid safflower oil or its blend is not less than 99.5 percent.
 - (ii) Gamma-linolenic acid content is between 400 and 450 milligrams gamma-linolenic acid per gram of the gamma-linolenic acid safflower oil or its blend.
 - (iii) Total content of stearidonic acid and *cis*, *cis*-6, 9-octadecadienoic acid in the gammalinolenic acid safflower oil or its blend must not exceed a total of 0.3 percent.
- (3) Addition of gamma-linolenic acid safflower oil, or its blend, to complete dry adult maintenance dog food must meet the following:
 - (i) Addition of the oil or its blend cannot provide more than 36 mg gamma-linolenic acid per kilogram body weight of the dog per day in more than 86 mg of the gamma-linolenic acid safflower oil or its blend. This maximum addition rate of the gamma-linolenic acid safflower oil, or its blend, is 0.3 percent of a complete dry adult maintenance dog food containing 3,600 kilocalories of metabolizable energy per kilogram of food as-fed.
 - (ii) Adjustments must be made for dog food formulas of different caloric density and/or that are fed to specific weights, breeds, or dogs of different activity levels to meet the requirements of this paragraph.
- (b) To assure safe use of the additive in addition to other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling of the additive shall bear the following:
 - (1) The name, gamma-linolenic acid (GLA) safflower oil.
 - (2) A guarantee for the minimum content of gamma-linolenic acid.
 - (3) Adequate directions for use such that the finished animal food complies with the provisions of paragraph (a)(3) of this section.





g) Migrate items from section 60 to 40 – Cat & Erin

Erin Bubb moves to ACCEPT the moving and renumbering as an editorial change. Ken Bowers seconds. MOTION PASSES. Section editors will handle in next OP revision.

40.1 (Old 60.1) Dried apple pomace

40.2 (Old 60.2) Dried apple pectin pulp

40.28 (Old 60.28) Dried potato products

40.8 (Old 60.8) Dried tomato pomace

40.112 (Old 60.112) (blank fruit) pomace

Cat Marrier -Several items that were proposed to move to Section 40 were moved in 2017 OP. The board never received the recommendation to move.

Was dried apple pomace to be deleted? Erin Bubb -no formal recommendation received to delete.

h) T60.117(B) Dried Black Soldier Fly Larvae – Erin

Erin Bubb moves to ACCEPT Proposed Definition as Tentative. Mark LeBlanc seconds. MOTION PASSES.

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 feed as a source of protein and fat consistent with good feeding practices. (Proposed xxxx)

Discussion:

Including with or without mechanical extraction (modeled after fish meal) removing the requirement for specific protein and fat percentages, but will allow whole, ground, or meal where the oil has been extracted.

Richard Ten Eyck asked about expanding to other species, Erin Bubb not expecting additional species in the near future. Charlotte Conway, CVM has received inquiries as to what would be needed (studies) but nothing formal.



Kristi Smedley, some products might have requirement for max/min crude fat requirement. Why is a max being required? Richard Ten Eyck: camelina meal -fat level drove what species it would be used for. Charlotte Conway: using addition of second fat requirement would be useful for nutritionist about fat content and providing additional info that this is mechanical extraction.

Kent Kitade "on as-fed basis" is this necessary? The guarantees are for the product being sold and not how it is being used. As fed basis was to distinguish from dry fed basis. Would this be enforceable Dave Edwards figured it would be easier to regulate as fed than on a dry matter basis. Charlotte Conway "as fed" is the same as "as is". Kent Kitade disagreed and thinks that as is basis is the best path forward and calculate. Kristi Smedley stated that the Model Bill (Model bill section 5 under A3) has guaranteed analysis expressed on an "as is" basis, and, therefore, suggests changing "as fed" to "as is".

Dave Dressler consumers may not know what they are getting. Would having the guarantees listed help the consumer know what they are getting. Erin Bubb do you think that the ingredient needs to declare mechanically extracted on the label this could be added to the definition. Dave Edwards stated that would be two different definitions. As a single ingredient would have mechanical extracted, but if mixed feed you don't need it.

Laura Scott stated Canada has this approved as well and has it allowed for use in poultry. Does it need to be considered if there needs to be two definitions for the different species. Dave Dressler agrees that there should be.

Investigator can make changes when tentative before it moves to official.

i) 73.045 21 CFR 573.900 Pyrophyllite – adopt CFR Listing – Richard Steve Gramlich moves to ACCEPT and publish the definition as Official. Ken Bowers seconds. MOTION PASSES.

73.045 Pyrophyllite (aluminum silicate monohydrate) may be safely used as the sole anticaking aid, blending agent, pelleting aid, or carrier in animal feed when incorporated therein in an amount not to exceed 2 percent in complete animal feed. 21 CFR 573.900

j) Remove Pyrophyllite from Table 73.001

Charlotte Conway moves to ACCEPT as long as 73.045 is published. Steve Gramlich seconds. MOTION PASSES

- 5) Discussions:
- a) Status on high profile ingredients (if needed) Richard / CVM None at this time
- b) Standard of identity Template Functions Move to January 2018 meeting. Will discuss further in January
- c) Hemp Update Bob Church & Brett Boswell, Bob Geiger, Colorado



Bob Church: Colorado seems to be moving in the right direction and industry is also moving forward. Main focus seems to be seed and seed oil. Has not received any feed ingredient definitions.

Charlotte Conway, CVM has not received any FAP's. Colorado Project is moving forward and in the right direction. Subgroups see seed oil and seed meal are the ingredients of most interest for animal food. Having conversations on submissions, so expects to see something soon. Ali Kashani, WSDA got inquiry about hemp seed recently. People are surprised that not allowed in animal food. Ali will send them to Bob Church. WSDA Assistant Director has submitted request AVMA for presentation in their July 2018 meeting.

Brett Boswell – similar boat as Bob Church on oil. A few firms have significant portions of a dossier. One firm is having feeding trials reviewed.

Jean Hofve, DVM, there is a great deal of interest in hemp products in the veterinary area.

d) Next committee meeting will be at AAFCO Midyear meeting in Anaheim, CA 1/23/18. Meeting Registration is opened, but waiting to put up until the OP is ready in the next few weeks.

Minutes accepted 10/24/17 by all members present at the meeting. 15/27 voted