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Ingredient Definitions Committee Report Midyear Meeting via Webinar

Two sessions conducted:

January 20, 2021, 2:45PM EST– 5:00PM Eastern
January 27, 2021 11:00AM EST – 1:00pm EST

Minutes approved by committee 3/5/2021

Recommendations to the Board and Association membership:

When needed, text is presented in appendix A .

- 1) The consideration of the revision of the feed term “human grade” as accepted by IDC should be placed in the BOD action table. Expectation is for them to take it up in October 2021 with the human grade guidelines document coming out of Model Bill Committee.
- 2) Publish a new tentative definition: **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”.**
- 3) Publish T60.117 (B) as official and delete the current 60.117. The new 60.117 to read: “**60.117 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



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swine feed as a source of protein and fat consistent with good feeding practices.”

- 4) Publish in the OP a new tentative definition T60.117 (c) that reads:
“**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.”

Board Action:

To be considered in May 2021

Association Action:

To be considered in August 2021

Recommendations not needing further Association review

- A. Edit 9.57 on page xx to read: “**9.57 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 **(except as unavoidable in good processing practices)**, 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.”
- B. Edit 9.71 on page xx to read: “**9.71 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 **(except**



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as unavoidable in good processing practices), 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.”

C. Edit to Flavor [table 87.30](#) Quebracho bark to read:

Common Name	Botanical Name of Plant Source	Limitations
Quebracho bark	Aspidosperma quebracho-blanco Schlecht, or Quebrachia lorentzii (Griseb.), or <u>Schinopsis lorentzii (Griseb.) Engl.</u>	Schinopsis lorentzii (Griseb.) Engl.



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Minutes IDC January 20 & 27, 2021

Session One (1/20/21) all 22 committee members were present online. 300 people attended the virtual meeting.

For the sake of meeting brevity Motions “to read” will have the appropriate process actions added to them when formulating the committee recommendations.

Session two (1/27/21) 18 committee members and 150 others were present online. Missing members were James Embry, Ashlee-Rose Ferguson, Ali Kashani and Kelli Younker.

- 1) *Hemp Update – Falina Hutchinson, MT One firm has prepared a definition request for Hemp Seed Cake for laying hens. The investigator has sent it to CVM for scientific review. – *note, this is the preliminary step in the AAFCO process.*
- 2) Modification of [Human Grade](#) Feed Term –Kim Truett Human grade - IDC chair to Hold until human grade guidelines pass model bill and present to the board at the same time as the guidelines. Brett / jacob

Brett Groves, IN moved to revise the feed term human grade to read: “Human Grade. Every ingredient and the resulting product **must be** ~~are~~ stored, handled, processed, and transported in a manner that is consistent and compliant with regulations for good manufacturing practices (GMPs) for human edible foods as specified in 21 CFR Part 117 **and those applicable federal human food laws as required by ingredient, process and/or facility type.**” IDC chair is to hold the recommendation until the human grade guidelines pass model bill committee and are in front of the Board. Jacob Fleig, MO seconded. *Motion passed with no opposition.*

Discussion entailed how to synchronize association acceptance and OP publication with the human grade guidelines being worked on in Pet Food Committee. Intention is for the revised feed term and the guideline to be published or killed together as one action by the association membership.

This discussion was revisited on the 27th to assure clarity. George Ferguson stated that USDA, AMS is updating their human grade pet food audit and needed a set of standards to be created to allow audits against the guidelines. The standards have been created and pilot audits have been completed. Expectations are that the guidelines will be in front of model bill at annual meeting 2021.

- 3) GRS Notice ~~_(placeholder)~~ _____ Nathan No item presented.



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- 4) [T33.29 Black soldier fly larvae oil](#) publish a new tentative definition - Richard Ten Eyck

Mika Alewynse, CVM moved to publish a new tentative definition: **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”.** Ken Bowers, KS seconded. *Motion passed with no opposition.*

- 5) [9.57 Poultry](#) edit definition - Stan Cook,

Jacob Fleig, MO moved to edit 9.57 to read: “**9.57 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 (**except as unavoidable in good processing practices**), 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.” Tom Phillips, MD seconded. *Motion passed with no opposition.*

Discussion held concerning the level of feathers allowed and the lack of quantification. The definition as currently published does not allow the presence of any feathers which was not the intent. This addition of “(except as unavoidable in good processing practices)” states that the presence of some feathers is allowable. The same reasoning applies to the change to 9.71 Poultry meal.

- 6) [9.71 Poultry meal](#) edit definition - Stan Cook,

Ken Bowers, KS moved to edit 9.71 to read: “**9.71 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 (**except as unavoidable in good processing practices**), 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



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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.” Tom Phillips, MD seconded. *Motion passed with no opposition.*

- 7) ~~New Ingredient CVM Placeholder (10 min) — TBD~~ no item presented.
- 8) Move [T60.117\(B\) Dried Black Soldier Fly Larvae](#) (incl swine) to Official and delete current 60.117. –Erin Bubb

Stan Cook, MO moved to publish T60.117 (B) as official and delete the current 60.117. The new 60.117 to read: “**60.117 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 as a source of protein and fat consistent with good feeding practices.” Mark LeBlanc, IN seconded. *Motion passed with no opposition.*

Discussion was held, among the questions raised was the use of “as-fed” vs “as-is.”

- 9) New tentative definition [T60.117 \(C\) Dried Black Soldier Fly Larvae](#) to add an intended use in adult dog food. -- Erin Bubb

Move to publish a new tentative definition T60.117 (c) that reads: **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.

1/20/21: A motion was made and withdrawn after discussion on pet treats, feedstocks & as-fed. This item should be revisited on the 27th.



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1/27/21: A motion to publish this tentative definition by Jacob Fleig and seconded by Tom Phillips. Motion passed with one in opposition. Adult dog food does broadly include supplements, snacks and treats. Section 5 of the model bill states that guarantees should be on an as-is basis (not as-fed). It was suggested it would be better to change all uses of as-fed at the same time and to not specifically change this definition at this time.

10) 90.27 (NEW Table) Pet food parenthetical [Vitamin common name table](#) (investigator update with action item) Tom Phillips

Discussion was held. There is still some disparity of opinions of how to reflect this information. No motion was made. CVM indicated the table is getting closer correctly following the CFR names. PFI proposed an alternate list with even less chemical nomenclature. The Investigator and Charlotte will work on the proposed table and bring it back at the April 1st IDC meeting.

A ten minute break was taken at this point on the 20th.

11) Header for [22.1 animal protein products](#) and [22.4 plant protein products](#) should be edited – Jacob Fleig

Ken Bowers, KS moved to edit the header of 22.1 to read: “**22.1 Animal Protein Products** may include one or more of the following **and should be able to provide a significant source of protein when used at an appropriate inclusion rate:**...” Motion was seconded by Tom Phillips, MD. *Motion was tabled until the 27th moved by Ken Bowers, KS and seconded by Erin Bubb, PA. Committee indicated no opposition to table the motion. – note, it will take a 2/3 majority of the committee to take the item up on the 27th.*

1/27/21 A motion to reconsider the item was moved by Jacob and Erin seconded. Motion passed with one abstention. Discussion was held and Jacob indicated a desire to scrap this recommendation and edits to 22.4 and edit the section header. The main motion and seconded was withdrawn.

- 12) Edit to Flavor [table 87.30](#) Quebracho bark – Richard Erin Bubb, PA moved to edit table 87.30 as displayed on the screen. Brett Groves, IN seconded. *Motion passed without opposition.*

Common Name	Botanical Name of Plant Source	Limitations
Quebracho bark	Aspidosperma quebracho-blanco Schlecht, or Quebrachia lorentzii (Griseb.), or <u>Schinopsis lorentzii (Griseb.) Engl.</u>	Schinopsis lorentzii (Griseb.) Engl.

- 13) Break for 10 minutes.

- 14) Not-Defined workgroup- Common Food Index Proposal, – Kent Kitade

The workgroup was not ready to report. They are still working on procedures on moving ingredients into the index. Expect a report at the April 1 meeting.

- 15) ODI Subcommittee report - ODI table to front of OP?–Jacob Fleig, MO

Subcommittee has not met. Need to identify the fields in the table to show ODI changes. Table to appear in the front of the OP.

- 16) Any Budget requests for 7/1/21 – 6/30/22? – Chair

- a. The Ingredient definitions workshop set for August 2021 needs budget lines. Numbers coming in late February.

- 17) NANP Subcommittee report – Ashley Shaw, CVM (new member)/Casey Dyklier, CA, Al Harrison, KY

The subcommittee has not met.

- 18) MSBC update, Workgroup Membership recruitment – Chair

Austin Therrel, SC has agreed to lead the group. Workgroup members have been nominated but not yet selected. A report should be ready by 6/15/21

- 19) Discussion: 73.107 Edit Lignin Sulfonate to call out all forms? Add after the cfr citation “ Feed labels may list the appropriate specific salts “ammonium



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Lignin Sulfonate,” ”calcium Lignin Sulfonate,” “magnesium Lignin Sulfonate,” or “sodium Lignin Sulfonate”.” – Richard Ten Eyck / Kristi Smedley

Currently only calcium lignin sulfonate is listed in ODI. Should the other forms be added to ODI or should the common or usual name be “Lignin Sulfonate”.
Discussion was held and the investigator will bring back a proposal at the April IDC meeting.

Session one recessed at 5:05PM EST at this point in the agenda. 300 people were on the meeting platform today.

Session two convened virtually after significant log-in difficulties on 1/27/21 at about 11:30 EST. A quorum of 18 committee members were present online. Several agenda items from the last session were revisited then the committee picked up the remaining agenda items below.

- 20) Review use of finished feed vs complete feed in chapter 6 of the OP. – CVM needs more time to review and should have recommendations ready in the April.
- 21) Workgroup report on sunseting (withdrawing) procedures for common or usual names in the OP. George F (lead), Maggie Faba, Leah Wilkinson, Kristi Smedley, By-Laws (Ken Bowers), David Edwards CVM, – George F. reported that the group has not met. They may be reaching out to states for examples of past actions. They will have a report in April.
- 22) Omaha Ingredient Submission workshop – Meagan Davis reported that the workgroup is working on content, speakers and delivery format. The face to face component may not happen until January 2022 in Mobile, AL. They are developing a budget template that is a better fit for online delivery. Meagan is working on a budget that should be ready for BOD review by the end of February.
- 23) Online training module for ingredient requests. – update by Sue Hays, E.D. Sue reported that two module sets are under development. One on ingredient definitions and one on feed labeling. Cost and availability are not set yet. The ingredient definitions module will be a prerequisite for the ingredient submission workshop.
- 24) Summary of Investigator Training Fall 2020 – Erin Bubb reported that AAFCO investigator 101 training was held virtually. Designed to onboard new investigators but was also a good review for current ones. Most of the content was provided by CVM staff. Most of the sessions were recorded but do not have clearance for non-regulatory distribution. There is some interest on sharing the session on historical evolution of IDC.



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25) Discussion on making a revision to the Bagasse definition or term -- Mark LeBlanc is looking at the common name and more modern terminology. Reach out to Mark at his Purdue email address if you're interested.

26) Adjourned 12:40PM EST

Announcements

Next Meetings: e-meeting 11:30AM EST and April 1, 2021 Register at this link:
https://us02web.zoom.us/webinar/register/WN_dhRbJiGASieUbPeQI92ByQ

- A. New Investigators: (none)
- B. Stale Ingredients: The following are being removed from consideration as definition requests. Please submit a new request if still desired.
 - a. Yeast for Ethanol production optimized for glucoamylase. No response to 2017 letter. – Ten Eyck
 - b. Yeast for Distillers – optimized for xylose. No response to 2017 letter. – Ten Eyck
 - c. Enzymes from T. citrinoviride.-- No response to 2018 letter. – Ten Eyck
 - d. Thymol – as a flavor. No response to 2016 letter. – Ten Eyck
 - e. Beta Glucan from mushrooms. No response to 2018 letter. – Ten Eyck
 - f. Erythrocyte extract as a preservative. No response to 2016 letter. – Ten Eyck
 - g. Dried Milk Permeate. No response to 2016 letter. – Kitade
- C. Parking Lot topics:
 - a. ICG Verification workgroup – have not met-
 - b. 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.
 - c.

Minutes approved 3/5/2021 with the following members not voting: Laura Scott, George Ferguson, Mika Alewynse, Stan Cook, Dave Phillips, Nathan Price, Kelli Younker



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