AUDIENCE: State Members

SUBJECT: Important – Share Your Comments on FDA Draft Guidance on New Animal Food Ingredient Approval Process

COPY:

[Name],

As you know, AAFCO announced earlier this month that the long-standing Memorandum of Understanding (MOU) with the FDA will not continue after it expires on October 1, 2024. If you attended the recent Annual Meeting, then you also know that AAFCO membership passed two important resolutions that will guide our work to develop an alternative IDC process.

On August 8, FDA released a set of documents that outline the agency's transition plan as well as the new interim Animal Food Ingredient Consultation process (AFIC). **FDA is seeking stakeholder comments on these documents between now and September 9.**

AAFCO will be submitting comments as an association, and we encourage all of you to review the following documents and consider submitting comments for your state agency or organization as well.

Documents Released

- **Docket FDA-2024-N-2979 "Request for Comments (RFC) Pre-Market Animal Food Ingredient Review Program)"** solicits stakeholder input in addressing specific questions and requests for information about FDA's Food Additive Petition (FAP) and Generally Recognized as Safe (GRAS) notification programs, to help the agency determine changes that may be needed to better serve public health and improve the path to market for new animal food ingredients.

- **Draft GFI #293 "FDA Enforcement Policy for AAFCO-Defined Animal Feed Ingredients"** explains that FDA will use enforcement discretion for the ingredients listed in the *2024 AAFCO Official Publication* (OP) and does not intend to initiate enforcement action in response to use of animal food ingredient names that are not common or usual names but are defined in the AAFCO OP, unless use of the name causes the label to be false or misleading.

- **Draft GFI #294 "Animal Food Ingredient Consultation (AFIC)"** describes an interim AFIC process for engaging with FDA regarding ingredients for which firms may have otherwise used the AAFCO ingredient definition process. While FDA evaluates its current FAP and GRAS Notification programs for animal food, the AFIC process would provide an additional means for consulting with FDA about new animal food ingredients.

Share Your Comments

FDA is seeking **stakeholder comment on draft GFI #293 and #294 until September 9**. Below are the instructions for submitting feedback. If you prefer your feedback to be considered and shared by AAFCO on your behalf, please submit to aafco@aafco.org by September 1.

- **Draft GFI #293 & #294**: FDA is accepting public comments on **draft GFI #293** and **draft GFI #294**. Due to the time-sensitive nature of the documents, the FDA does not intend to extend the comment period before it begins work on the final version of the guidance. Submission instructions can be found in the **Federal Register NOA**. Comment period deadline is September 9, 2024.

- **Docket FDA-2024-N-2979**: Stakeholders are invited to submit input via **Request for Comments: Pre-Market Animal Food Ingredient Review Programs** on specific questions and requests for information about FDA's Food Additive Petition (FAP) and Generally Recognized as Safe (GRAS) notification programs, to help the agency determine changes that may be needed to better serve public health and improve the path to market for new animal food ingredients. Submission instructions can be found in the **Federal Register NOA**. Comment period deadline is December 9, 2024.

Thank you for taking the time to review these important documents and sharing feedback. This collaborative approach will ensure our collective voice is heard, and that FDA's final guidance reflects the needs and perspectives of our members.

Sincerely,

Austin Therrell
AAFCO Executive Director