Association Business Meeting Minutes
2022 AAFCO Annual Meeting
Hilton at the Ballpark | St. Louis, MO
Thursday, August 4, 2022
8:30 am–10:00 am (CT)

1. **Meeting Called to Order 8:43am CT**

2. **Convene Business Session of the Association:** George Ferguson, President
    a. Welcome & Opening Remarks
    b. Announcement of New Life Members
        i. Brett Groves, Office of Indiana
        State Chemist (AAFCO Member 1999–2022)
    c. Presentation of Awards
        i. Distinguished Service Award: Hollis Glenn and Scott Ziehr for their time, dedication, and leadership in hosting the 2021 and 2022 Feed Administrator's Seminar.

3. **Acceptance of Committee Reports From:** Current Issues and Outreach, Education and Training, Feed and Feed and Feed Ingredient Manufacturing, Feed Labeling, Ingredient Definitions, Ingredient Definitions eMeeting 03/23/22, Ingredient Definitions eMeeting 05/03/22, Laboratory Methods & Services, Model Bills and Regulations, Pet Food, Proficiency Testing Program, Strategic Affairs – Austin Therrell, President-Elect

    (Reports are published on the AAFCO website on the 2022 Annual Meeting page, right side, under the heading "Committee Reports.")

    Austin Therrell moves to accept committee reports, Scott Ziehr Seconds. Motion Carries.

4. **Acceptance of Committee Recommendations:** Austin Therrell, President-Elect

    a. Pet Food Committee:

        i. Replace the current "Human Grade" Guidelines which start on page 158 of the 2022 Official Publication, with the revised Guidelines for "Human Grade" Claims below.

        Guidelines for "Human Grade" Pet and Specialty Pet Food Claims
        AAFCO recommends and supports the following guidelines for the use of the term "human grade" in the labeling of pet foods and specialty pet foods. Pet and specialty pet foods using the labeling claim "human grade" are first and foremost animal food products and subject to inspection under 21 CFR part 507. In order to substantiate that a human grade claim is truthful and not misleading, these guidelines describe how all human grade pet food products should be manufactured in accordance with the applicable human food regulations for a ready-to-eat human food.

            1. In the AAFCO defined feed term "human grade", the use of the term "human grade" is only acceptable in reference to the product as a whole. The feed term specifies that every ingredient and the resulting product must be stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR part 117 and those applicable federal human food laws as required by ingredient, process and/or facility type.

2. All facilities that process or package a final “human grade” pet food product that is considered ready-to-eat must register with FDA as a food facility operating under both General Product Categories (Food for Human Consumption & Food for Animal Consumption) as found in Section 9a of the U.S. Food and Drug Administration Food Facility Registration.

   It shall be the manufacturing firm’s responsibility to ensure it is able to manufacture in a human food facility and be licensed/registered and inspected by the authorized agency for human food production. Human Grade Pet Food claims are voluntary, and as such, no feed control official, neither state nor federal, can mandate that a human food authority license a facility that is only manufacturing a pet food product.

3. The firm must maintain written procedures to help ensure “human grade” products are stored, transported, and handled throughout the distribution channel in a manner that maintains the product’s “human grade” status.

4. In order to substantiate that a “human grade” pet food claim is truthful and not misleading on products under the federal authority of FDA for human food production and subject to 21 CFR Part 117, the firm must maintain and make available upon request, documentation (e.g., affidavits) sufficient to show that:
   a. All individual ingredients supplied to the manufacturer that are further utilized in the manufacture of human grade pet food, are fit for human consumption.
   b. Every ingredient and the resulting product are stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR part 117 and the final product is considered ready-to-eat.
   c. The manufacturing facility is licensed to produce human food by all appropriate/required authorities.
5. In order to substantiate that a “human grade” pet food claim is truthful and not misleading, on products that are under the federal authority of an agency other than FDA for human food production (e.g., USDA FSIS):
   a. a. Where final processing (i.e., mixing, blending) and/or packaging occurs in a registered FDA Human Food Facility subject to 21 CFR Part 117, the firm must maintain and make available upon request, documentation (e.g., affidavits) sufficient to verify that:
      i. The product is ready-to-eat with all included ingredients processed, packed, held, and shipped in compliance with the applicable federal regulations for the manufacture of human foods prior to final mixing/blending and/or packaging.
      ii. All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food.
      iii. The FDA facility that processes and/or packs the “Human Grade” Pet Food is licensed to produce human food by all appropriate/required authorities.
   b. Where final processing (i.e., mixing, blending) and/or packaging occurs in a non-FDA food facility producing human food (e.g., slaughter plant), the firm must maintain and make available upon request, documentation sufficient to verify that:
      i. The product is ready-to-eat with all included ingredients processed, packed, held, and shipped in compliance with the applicable federal regulations for the manufacture of human foods prior to final mixing/blending and/or packaging.
      ii. All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatory authority to produce human food.
      iii. The processing and/or packing of the final product is conducted in an area/room identified within the facility’s required HACCP/Food Safety Plan as an area/room that can be used for the blending, packaging, repackaging and/or labeling of an edible ready-to-eat food.

iv. The non-FDA facility that processes and/or packs the “Human Grade” Pet Food is licensed to produce human food by all appropriate/required authorities.

c. The manufacturer of a pet food or specialty pet food product with “human grade” claims must ensure:
   i. It is clearly labeled for its intended use as animal food, such as “dog food” or “cat treats”.
   ii. No statements of quality or grade appear in the ingredient statement [PF5(d)(3)].
   iii. The largest or most prominent use of the term “human grade” on each panel of the label and any labeling (brochures, point of sale materials, websites, etc.) must be juxtaposed with the statement of intended use (e.g., human grade dog food or human grade cat treats), in the same style, color print, and type size as the term “human grade”.
   iv. A claim of “human grade ingredients” is only acceptable if the product as a whole meets the requirements of the “human grade” pet food term; and
   v. The label is in compliance with all applicable labeling rules, including any voluntary labeling allowed under participation in the Agriculture Marketing Service Process Verified Program.

Board Recommends Acceptance. Austin Therrell moves, Ben Jones Seconds, Motion Carries.

b. Ingredient Definitions Committee:

i. Board recommends acceptance of the replacement of the current Human Grade feed term, in Chapter 6 under “Feed Terms and Definitions” which start on page 344 of the 2022 Official Publication, with the updated Human Grade term. “Human Grade. Every ingredient and the resulting product must be stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR Part 117 and those applicable federal human food laws as required by ingredient, process and/or facility type.”

Board Recommends Acceptance. Austin Therrell moves, Stan Cook Seconds, Motion Carries.

ii. Publish a new tentative definition relating to organisms in 36.11 Dried Fermentation Product to allow the use of Lactobacillus diolivorans as a silage inoculant. Leave the existing definition in place. Pg. 399. “**T36.11 Dried ____ Fermentation Product** is the product derived by culturing ____ on appropriate nutrient media for the production of one or more of the following: enzymes, fermentation substances, or other microbial metabolites, and dried in accordance with approved methods and good manufacturing practices. Protein, amino acids, fat, fiber, cell count, enzyme activity or nutrient metabolite level shall be guaranteed where applicable. Use of *Lactobacillus buchneri* **and *Lactobacillus diolivorans*** is limited to silage and high moisture corn grain in plant inoculant products. [For label identification the source must be indicated such as *Bacillus subtilis*, *Aspergillus oryzae*, *Aspergillus niger*, *Lactobacillus acidophilus*, *Lactobacillus buchneri*, ***Lactobacillus diolivorans*****,** *Lactobacillus delbrueckii or Enterococcus faecium*, or as permitted by FDA.]”

Board Recommends Acceptance. Austin Therrell moves, Miriam Johnson Seconds, Motion Carries.

iii. Make the following changes in ODI and publish the changes for record in the Official Publication, starting on page iii (tentative changes do not go into ODI) **

ODI Action	Name	Reference	Comments
New Name	Dried Lactobacillus Diolivorans Fermentation Product	36.11	Business meeting 8/4/22

Board Recommends Acceptance. Austin Therrell moves, Scott Absher Seconds, Motion Carries.

iv. Remove Pennyroyal American and Pennyroyal European from table listed in definition 87.30 Flavoring Agents, beginning on page 471 of the 2022 electronic OP, and list them in section 99 as Withdrawn Ingredients.

Board Recommends Acceptance. Austin Therrell moves, Eric Brady Seconds, Motion Carries.

v. Make the following changes in ODI: (tentative changes do not go into ODI) **

ODI Action	Name	Reference	Comments
remove reference	**ferric choline citrate**	90.26	IDC meeting 2/24/22
Remove ingredient	Pennyroyal, American		Business meeting 8/4/22
Remove ingredient	Pennyroyal, European		Business meeting 8/4/22

Board Recommends Acceptance. Austin Therrell moves, Cody Walls Seconds, Motion Carries.

vi. Remove footnote regarding Molasses collective term listed on page 375 of the 2022 Official Publication "~~The molasses collective term is not recognized by the FDA (21 CFR 501.110).~~"

Board Recommends Acceptance. Austin Therrell moves, Scott Ziehr Seconds, Motion Carries.

vii. Publish a new Official Definition 33.29 Black Soldier Fly Larvae Oil on Page 407 of the 2022 Official Publication and to delete the tentative definition, T33.29. "**33.29 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". (proposed xx , adopted xx)"

Board Recommends Acceptance. Austin Therrell moves, David Snell Seconds, Motion Carries.

vi. Delete the existing Official Definition, 60.117 Dried Black Soldier Fly Larvae, and replace the Official Definition with T60.117(C) Dried Black Soldier Fly Larvae on page 445 of the 2022 Official Publication. "**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. (Proposed 2022, amended xx)"

Board Recommends Acceptance. Austin Therrell moves, Scott Absher Seconds, Motion Carries.

vi. Delete the existing official definition 70.309 Urea Formaldehyde Condensation Polymer on page 458 of the 2022 Official publication and replace it with T73.309 Urea Formaldehyde Condensation Polymer. "**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. (Proposed 2022)

Board Recommends Acceptance. Austin Therrell moves, Miriam Johnson Seconds, Motion Carries.

vii. Make the following changes in ODI and publish the changes for record in the Official Publication, starting on page iii (tentative changes do not go into ODI) **

ODI Action	Name	Reference	Comments
Add ingredient and reference	Black Soldier Fly Larvae Oil	33.29	Business meeting 8/4/22
Remove ingredient	Calcium lignin sulfonate		Business meeting 8/4/22
Add ingredient and reference	Hydrophobic Silica	Table 101.1	Business meeting 8/4/22
Add ingredient and reference	Polyethylene glycol (400) dioleate	Table 101.1	Business meeting 8/4/22
Add ingredient	Polysorbate 60	Table 101.1	Business meeting 8/4/22
Add ingredient	Phytase	Table 101.1	Business meeting 8/4/22
Add ingredient	L-Methionine 85%	Table 101.1	Business meeting 8/4/22
Add ingredient	Canthaxanthin	Table 101.1	Business meeting 8/4/22
Add ingredient	L-Glutamine	Table 101.1	Business meeting 8/4/22
Add ingredient	Saccharomyces cerevisiae expressing xylose isomerase from Piromyces sp. E2	Table 101.1	Business meeting 8/4/22
Add ingredient	L-methionine 90%	Table 101.1	Business meeting 8/4/22
Add ingredient	Dried Methylobacterium extorquens biomass	Table 101.1	Business meeting 8/4/22
Add ingredient	Clinoptilolite of sedimentary origin	Table 101.1	Business meeting 8/4/22
Add ingredient	Krill Meal	Table 101.1	Business meeting 8/4/22
Add ingredient	Beta-Glucanase	Table 101.1	Business meeting 8/4/22
Add ingredient	Dried L-threonine fermentation product	Table 101.1	Business meeting 8/4/22

ODI Action	Name	Reference	Comments
Add ingredient	Marine microalgae oil	Table 101.1	Business meeting 8/4/22

Board Recommends Acceptance. Austin Therrell moves, Steve Gramlich Seconds, Motion Carries.

**ODI updating—in order to add transparency of the impact of committee decisions on the Online Database of Ingredients (ODI) label validation tool, the committee recommendations will include a table of the anticipated changes to ODI to reflect changes to common or usual names and/or references in the OP. It is anticipated this table will also appear in the front of the OP with the dates of adoption by the Association Membership. OP section editors are responsible for the accuracy of the ODI updates.

c. Feed & Feed Ingredient Manufacturing Committee

i. Update the Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients in Chapter Five of the AAFCO OP, following the Analytical Variations (AV) on Page 306 of the 2022 AAFCO Official Publication.

Review Appendix 1

Board Recommends Acceptance. Austin Therrell moves, Tom Phillips Seconds, Motion Carries.

d. Strategic Affairs Committee:

i. Insert the new "AAFCO Policy On Resolutions" in Chapter 5 of the 2022 Official Publication beginning on page 241.

Strategic Affairs Minutes 20220309
TEXT REVIEWED AND EDITED BY FASS: March 9, 2022 version
AAFCO POLICY ON RESOLUTIONS (adopted 8/4/22)

I. PURPOSE
Each year prior to the AAFCO Association Business Meeting, resolutions are submitted to the AAFCO Board of Directors by members or committees for consideration. Through this process, members and committees may raise concerns and suggested action relating to legislative, regulatory, and technical issues as they apply to commercial animal feed and food safety issues.

II. SCOPE
To establish protocols for the receipt and consideration by members of proposed resolutions submitted through the AAFCO Board of Directors that involves procedures, format, and frames.

III. PROCEDURES
1. In January of each year, the President shall call for resolutions at the Midyear Association Business Meeting. The Executive Director may follow up with members through additional communications and seek the submission of resolutions by members and committee chairs.

2. Proposed resolutions will be accepted only if they come from an AAFCO member representative or committee recommendation. If needed for explanatory purposes, a resolution should be accompanied by a statement (not to exceed one page) summarizing the purpose and the justification for the proposed resolution. Guidance and resolution samples will be provided to members to assist with drafting.

3. The Executive Director shall receive and accept all resolutions that meet established guidance on clarity and form and may modify language if deemed advisable, as long as the intent is not changed and the change is in consultation with the resolution sponsor. The Executive Director may consolidate resolutions that are similar in content and intent and so indicate when presenting the revised resolution to the Board.

4. The Executive Director, by tradition, shall also prepare and present at the time and place of AAFCO Annual Meeting additional resolutions that are of a memorial or recognition nature or in good etiquette and are appropriate for the Association.

5. All proposed resolutions reviewed and accepted for clarity and form by the Executive Director shall be submitted to the Board of Directors no later than 60 days prior to the Annual Meeting for approval by the Board of Directors. The Board may invite the sponsor of the resolution to attend a Board of Directors meeting to provide context for the resolution and answer questions. Resolutions that are not passed by the Board of Directors for approval shall not be provided to members for consideration at the Annual Association Business Meeting.

6. The President or President-Elect will be responsible for coordinating the inclusion of the Board-approved proposed resolutions, which are to be presented for membership approval, into the meeting materials for the Annual Association Business Meeting.

7. All resolutions reviewed and approved by the Board of Directors shall be presented to the membership during the Annual Association Business Meeting by the President-Elect, with the Board of Directors' recommendations of approval.

8. Floor action on resolutions shall be by two-thirds majority vote of the members present or by proxy at the Annual Association Business Meeting, which constitutes a quorum.

9. The AAFCO Board of Directors shall initiate all action required by the approved resolutions and will attempt to achieve the resolution's intent during the ensuing year. Board members may delegate actions to the Executive Director or Committee Chairs for implementation.

10. The Executive Director shall coordinate the posting of resolutions on AAFCO's website and forward copies to appropriate parties at the direction of the Board of Directors. Response to a resolution may be posted on AAFCO's website at the discretion of the Board of Directors.

IV. PROCESS SUMMARY

Benchmark	**Estimated Dates**	**Action**	**Responsible Party**	**Notes**
Midyear Association Business Meeting	January 15	Call for resolutions to members	President	Resolutions due 60 days prior to the Annual Meeting
60 days prior to the Annual Meeting	June 1	Collect, organize, review, and consolidate, if needed, resolutions for consideration by the Board	Executive Director	Executive Director assembles resolution(s) for BOD consideration
June Board meeting	June 20	Board members review and approve resolutions for membership	BOD members	Resolutions not approved by the Board will not be

		consideration		recommended for membership consideration
Annual Association Business Meeting	August 1	Membership vote	President -Elect	During Association Business Meeting
Board Meeting at end of Annual Meeting	August 5	Board members provide direction on where to post resolution or any other action needed	BOD members	Provides direction on next steps for publishing and enacting resolution to Executive Director
30 days after the Annual Meeting	September 5	Post resolutions (other actions as needed)	Executive Director	Post approved resolutions on website

Board Recommends Acceptance. Austin Therrell moves, Eric Brady Seconds, Motion Carries.

5. Nomination Committee

The Nominating Committee recommends the following slate for Board of Directors beginning January 1, 2023.

President: Austin Therrell, SC
President-Elect: Hollis Glenn, CO
Secretary-Treasurer: Ashlee-Rose Ferguson, WA
Director: Eric Brady, TN
Director: Joshua Arbaugh, WV
Director: Laura Scott, CAN
Director: Darrell Johnson, KY
Director: Dan King, MN
Immediate Past President: George Ferguson, NC

Board Recommends Acceptance. Austin Therrell moves, Eric Brady Seconds, Motion Carries.

This concludes committee and board recommendations needing membership approval.

6. Credential Report: FASS

Number of voting members represented: 36
Number of states in attendance: 44
Number of countries: 7 (Including USA and Puerto Rico)
Number of FDA representatives: 43
Number of life members: 8
Total meeting attendance: 456 (340 in-person, 116 Virtual)

7. Meeting Concluded at 9:06am CT.