AAFCO
Association of American Feed Control Officials

# 2023 ANNUAL MEETING
# COMMITTEE MINUTES

FROM
JANUARY 2023
SAN ANTONIO, TEXAS


## Contents

# Association Business Meeting Minutes

2023 AAFCO Midyear Meeting
January 17, 8:45–10:15 am CST, San Antonio, Texas

## Agenda

1. **Meeting Called to Order 9:07 am CT**
2. **Welcome and Opening Remarks:** Eric Brady, President
3. **Acknowledgement of Awards:** Eric Brady, President
    - Presidential Awards
        - Stan Cook – For his commitment and dedication in representing AAFCO as NASDA Liaison.
        - Jacob Fleig – For his commitment and dedication to AAFCO's work, including his leadership role as Technology Committee Chair and committee member of Education and Training, Inspection and Sampling, Ingredient Definitions, and Current Issues and Outreach.
        - Hollis Glenn – For his commitment and dedication to the AAFCO Board of Directors.
        - Austin Therrell – For his commitment and dedication to the AAFCO Board of Directors.
    - Distinguished Service Awards
        - Linda Morrison – For her leadership while guiding the Executive Director Search and development of the 2023 AAFCO Strategic Plan.
        - Richard Ten Eyck – For his years of dedicated service and leadership as Chair of the AAFCO Ingredient Definition Committee, as well as the significant roles he has filled as a member and mentor in numerous other AAFCO committees.
    - Appreciation Awards
        - Ingredient Submission Workshop Workgroup – Charlotte Conway, Ciro Ruiz-Feria, Kristi Smedley, Falina Hutchinson, Lindsay Meyers, Betty McPhee, Emily Helmes, Stephanie Adams, Meagan Davis, and Nathan Price, for their hard work and contributions to the Ingredient Submission Workshop.
        - Dave Dzanis – In recognition of his hard work and contributions to the Pet Food Label Modernization Workshop.
    - E.B. Vorhees Award, Shannon Jordre – For a career of outstanding vision, leadership, promotion, and dedication to the association and assuring safe animal feed.
4. **Roll Call:** Ashlee-Rose Ferguson, Secretary-Treasurer
5. **Acceptance of Committee Reports from:** Current Issues and Outreach, Education and Training, Feed and Feed Ingredient Manufacturing, Feed Labeling, Inspection and Sampling, Ingredient Definitions, Ingredient Definitions eMeeting 09/16/22, Laboratory Methods and Services, Model Bills and Regulations, Pet Food, Proficiency Testing Program, Strategic Affairs – Josh Arbaugh, President-Elect
   (Reports are published on the AAFCO website on the 2023 Midyear Meeting page, right side, under the heading "Committee Reports.")
   **Josh Arbaugh moves to accept committee reports. Robert Tolton seconds. motion carries.**
6. **Acceptance of Committee Recommendations:** Eric Brady, President
    a. **Ingredient Definition Committee Recommendations:**
        i. IDC Recommends publishing the CFI procedures in the 2023 OP on page 336.
        **AAFCO COMMON FOOD INDEX PROCEDURES**
        **Introduction**
        The Common Food Index Subcommittee was established by the AAFCO Ingredient Definitions Committee (IDC) as the body to facilitate the addition of new items to the Common Food Index (CFI). Members of the CFI Subcommittee are appointed by the Chair of the Ingredient Definition Committee. The number of members, identification of the subcommittee chair, and terms of service are at the discretion of the IDC Chair. The IDC Chair should consider the volume of work and availability of the volunteers when making these appointments. This document will describe how items are added to the CFI. All the items in the CFI must meet the AAFCO Feed Term "Common Food" as

found in the AAFCO *Official Publication*. The CFI will reside on the AAFCO.org website and within the AAFCO Online Database of Ingredients (ODI).

**Procedures**

1) Suggesting additions to CFI – Initiating the process
    a. A suggestion may be made by any stakeholder (consumer, regulator, CFI Subcommittee, industry representative, etc.)
    b. A suggestion is made by completing the CFI Worksheet found on AAFCO.org
    c. More information may be requested by CFI subcommittee if needed/helpful to confirm that the suggestion meets the criteria in the AAFCO feed term "Common Food"
2) Reviewing the suggestions received
    a. The CFI Subcommittee Coordinator (with the assistance of the CFI Subcommittee) will review the submission. The Subcommittee will notify the submitter if the item will be posted for public review or if the item will not be accepted by the subcommittee within 30 days of the submission.
    b. The responses to the questions on the worksheet broadly establish a profile for the suggested item. The profile must fit the criteria set in the AAFCO Feed Term "Common Food"
    c. Review of the submissions will be conducted as they are received. Suggestions that meet the AAFCO feed term "Common Food" will go for public comment in monthly intervals
    d. Suggestions that do not meet the AAFCO feed term "Common Food" will also be included in the CFI Subcommittee report to IDC with explanation on criteria not met.
3) Public Comment Period
    a. Pending additions to the CFI are posted monthly on AAFCO.org and in the Feed Bin with submission of comments to a portal.
    b. A notice targeting animal nutritionists (ARPAS), veterinarian toxicologists (ABVT), veterinarians, FDA-CVM, USDA, consumer groups, and general public is issued. The notice should encourage animal scientists to share their professional opinion including support of/disagreement with inclusion into the CFI.
    c. Duration: Although comments on the safety of items listed in the Common Food Index are always accepted, comments received within 30 days of posting will be evaluated by the subcommittee.
    d. The CFI Subcommittee should screen the comments as they are received to avoid a backlog
    e. Public comments are reviewed as to the product's risk, utility, and appropriateness for that item's inclusion in the CFI by the CFI Subcommittee
4) Reporting to Ingredient Definition Committee
    a. Suggestions that pass though the public comment period without issue will be listed in the CFI Subcommittee report to IDC
    b. Suggestions that do not pass the screening process will also be reported to IDC along with summarized comments to explain what criteria were not met
    c. CFI Subcommittee shall submit their report at least 30 days prior to the next IDC meeting
5) Acceptance of common foods into the CFI
    a. The IDC will vote to accept the CFI Subcommittee report
    b. The IDC can discuss the CFI Subcommittee's findings
    c. IDC has the prerogative to amend the findings
    d. In a separate vote, IDC shall vote whether to accept the recommendations for indexing with or without modifications

e. Upon acceptance of the IDC meeting minutes by the AAFCO Board of Directors, the new common foods will be added to the CFI.
f. New additions will be noted in the ODI Change Table found in the AAFCO *Official Publication* biannually.

6) Removal of indexed items from the CFI
   a. CFI Subcommittee receives new information that raises a safety or other concern.
   b. The CFI Subcommittee immediately alerts the IDC chair of the new information and may recommend the removal of the indexed item from the CFI.
   c. The IDC chair may elect to remove the item immediately from the CFI in the case of an emergency, or otherwise refer to IDC for vote.
   d. The CFI Subcommittee recommendation to IDC chair will be reported to the IDC.
   e. The IDC shall acknowledge the removal at its next meeting by accepting the CFI Subcommittee report. The IDC has the prerogative to override the removal.
   f. Items removed from the CFI shall be posted on the "Withdrawn from CFI" list in the IDC library in the Feed BIN.
7) Appeal Process
   a. Any stakeholder may appeal an IDC decision regarding CFI listings by providing further information for the subcommittee to evaluate.
   b. Actions subject to appeal
      1. Subcommittee decision to not accept for public review
      2. IDC decision to accept or not to accept an item for inclusion in the CFI
      3. IDC decision to remove an item from the CFI
   c. An appeal can be submitted by emailing aafco@aafco.org
   d. While there is no deadline to file an appeal, it is preferred that one is filed as early as possible after the IDC vote on the item in question to avoid unnecessary or duplicative work.
   e. The appeal will be discussed by the CFI Subcommittee. The subcommittee's recommendation shall be included in the next CFI Subcommittee report to the IDC.
   f. The IDC's vote on the appeal is final.

**Board recommends acceptance. Josh Arbaugh moves; Scott Ziehr seconds; motion carries.**

ii. IDC Recommends publishing the CFI worksheet on the AAFCO website (set up new portal).

**AFFCO Common Food Index (CFI) Worksheet Version 8/4/22**
**Status: Accepted by IDC**

**Common foods** (AAFCO Feed Term) – Common foods are commercially available and suitable for use in animal food but are not defined by AAFCO, including but not limited to certain whole seeds, vegetables, or fruits. Common food for animals may include common human foods that are known to be safe for the intended use in animal food.

Manufacturers are responsible for determining whether a common food is safe and has utility for its intended use prior to commercial distribution as animal food.

To submit an ingredient to be added to the AAFCO Common Foods Index, please complete the following worksheet. The worksheet will help the Common Food Index Subcommittee determine if the ingredient meets the qualifications of a Common Food as described in the AAFCO feed term.

The worksheet has YES and NO responses denoted in Green or Red to help guide the submitter if the suggested item meets the definition of "common food." Green responses <u>may</u> indicate that the suggested item complies with the Common Foods

feed term. The red responses may indicate that the suggested item **does not** comply with the Common Food feed term. The responses in black provide further information for the CFI Subcommittee.

Name:
Affiliation:
Regulator, Firm, or Consumer:
Email address:
Name of ingredient:
General description of the ingredient:
*Date of submission: (assigned by software)*

1. Is the purpose of the item other than providing general nutrition, taste, aroma, or technical effect? **YES** or **NO**
    a. If YES, what is the general purpose?
2. Is this a single item and not a combination of items (mixed)? **YES** or **NO**
3. Is the item defined by AAFCO or otherwise exist in chapter 6 of the AAFCO *Official Publication*, OR already exists in the CFI/ODI? **YES** or **NO**
4. Does the submitter have adequate safety data and information available for this item? **YES** or **NO**
5. Is the item a refined product or a fraction of a whole ingredient? **YES** or **NO**
6. Is the item a manufactured or synthetic substance? **YES** or **NO**
7. Is the item distributed with a therapeutic health claim? **YES** or **NO**
8. Is the item commercially available in the United States? **YES** or **NO**
    a. If NO, is the item only commercially available in another country? **YES** or **NO**
    b. If 8.a. is YES, then which country?
9. Is the item a conventional human food? **YES** or **NO**
10. Is this item a human food supplement under DSHEA? **YES** or **NO** (DSHEA – Dietary Supplement Health Education Act)
11. Is the item a by-product of a food manufacturing process? **YES** or **NO**
12. Has the item undergone a manufacturing process (drying, cooking, grinding, fermenting, pureed, etc.)? **YES** or **NO**
    a. If YES, what is the process?
13. Is the item intended for use by ALL animal species? **YES** or **NO**
    a. If NO, why?
    b. Intended for which species?

**Board recommends acceptance. Josh Arbaugh moves; Scott Ziehr seconds; motion carries.**

iii. IDC recommends replacing the existing CFI policy in the 2023 OP on page 335 with the below:

**Common Food Index Guidelines**

Editor: Chair of Ingredient Definitions Committee Version 8/4/22

**Purpose:**

The Common Food Index (CFI) is a repository of common foods that may be appropriate for use in animal food and are not defined by AAFCO. The CFI is provided as a tool for use during review of ingredients on an animal food label and provides harmonization and transparency. Label reviews will continue to rely on the expertise of the individuals performing the reviews. The acceptance of indexed items in animal food continues to be at the discretion of regulatory agencies.

These common foods must align with the feed term Common Foods in the Feed Terms and Definitions within Chapter 6 of the AAFCO *Official Publication*. The CFI is not a substitute for the AAFCO process for new feed ingredient definitions; Chapter 6 of the *Official Publication*, alone, contains the officially recognized feed ingredient definitions.

**Subcommittee:**
A CFI subcommittee of four (4) AAFCO members will be appointed by the Chair of the Ingredient Definition Committee (IDC).
The subcommittee will investigate the proposed common foods alone or with assistance of experts anytime the subcommittee deems it necessary. Experts are not limited to regulatory officials or academia and may include other stakeholders with relevant knowledge. Experts shall declare any conflicts of interest as a condition of consideration of their participation.
**Indexing:**
The CFI will be maintained on the AAFCO.org website and the indexed common foods incorporated into the Online Database of Ingredients (ODI) for reference.
**Note:**
Feed/food manufacturers are still responsible for evaluating and documenting the safety of all ingredients for their intended use prior to distribution.
**Board recommends acceptance. Josh Arbaugh moves; Ben Jones seconds; motion carries.**

iv. IDC recommends publishing an amended **33.16 Methyl Esters of Conjugated Linoleic Acid** to reflect the CFR amendment on page 402 of the 2023 OP.
**33.16 Methyl esters of conjugated linoleic acid (cis-9, trans-11 and trans-10, cis-12- octadecadienoic acids)** may be safely used in swine feed **and feed for early lactation dairy cows (less than 100 days-in-milk)** in accordance with the prescribed conditions:

(a) The food additive is manufactured by the reaction of refined sunflower oil with methanol to produce fatty acid methyl esters, which then undergo conjugation to yield methyl esters of octadecadienoic acid. The additive consists of not less than 28 percent methyl ester of cis-9, trans-11-octadecadienoic acid, and not less than 28 percent methyl ester of trans-10, cis-12-octadecadienoic acid with the sum of the other methyl esters of octadecadienoic acid not to exceed 4 percent. The additive shall contain not less than 35 percent of other fatty acid esters composed of oleic acid, palmitic acid, stearic acid, linoleic acid, and other associated acid esters.

(b) The additive is used or intended for use in the feed of:
  (1) growing and finishing swine as a source of fatty acids at levels not to exceed 0.6% in the finished feed.
  (2) early lactation dairy cows to reduce the energy concentration in milk when fed at levels not to exceed 33 grams per cow per day.

(c) The additive meets the following specifications:
  (1) Free methyl alcohol not to exceed 0.015%.
  (2) Insoluble impurities not to exceed 0.1%.
  (3) Moisture not to exceed 0.5%.
  (4) Unsaponifiable matter not to exceed 1.0%.

(d) To assure safe use of the additive, in addition to the other information required by the act:
  (1) The label and labeling of the additive and any feed premix shall bear the following:
    (i) The name of the additive.
    (ii) A statement to indicate that methyl esters of conjugated linoleic acid (cis-9, trans-11 and trans-10, cis-12 octadecadienoic acids) must not be added to vitamin or mineral premixes.
  (2) The label and labeling of the additive, any feed premix, or complete feed prepared therefrom shall bear adequate directions for use.

21 CFR 573.637 (Proposed 2009, Adopted 2013, Amended XXXX)
**NOTE:** Items in bold represent the changes.

**Board recommends acceptance. Josh Arbaugh moves; George Ferguson seconds; motion carries.**

v. IDC recommends publishing a new tentative definition for **T36.11(a)**, to add *Lentilactobacillus hilgardii* on page 407 of the 2023 OP.

**36.11 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, Lactobacillus diolivorans* and *Lentilactobacillus hilgardii* 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*, *Lentilactobacillus hilgardii*, *Lactobacillus bulgaricus delbrueckii* or *Enterococcus faecium*, or as permitted by FDA.] (Proposed 1976, Adopted 1983, Amended 1997, Amended 1999, Amended 2001, Adopted 2003, Amended 2010, Adopted 2014 rev.1, Amended XXXX)
~~IFN 5-06-154 Lactobacillus bulgaricus fermentation product dehydrated~~

**Board recommends acceptance. Josh Arbaugh moves; Robert Tolton seconds; Motion Carries.**

vi. IDC recommends publishing **T42.25 Grain Sorghum Protein Feed** as Tentative on page 413 of the 2023 OP, removing "Grain Sorghum Gluten Feed" in the 2025 *Official Publication*.

**T42.25 Grain Sorghum Protein Feed** is that part of the grain of grain sorghums that remains after the extraction of the larger part of the starch and germ, by the processes employed in the wet milling manufacture of starch or syrup. Originally called Grain Sorghum Gluten Feed (adopted 1948, amended 1950, amended 2023). Remove "42.2 Grain Sorghum Gluten Feed" in the 2025 *Official Publication*.
(Adopted 1948, Amended 1950, Name amended 2023)

**Board recommends acceptance. Josh Arbaugh moves; Jacob Fleig seconds; motion carries.**

vii. IDC recommends publishing **T42.35 Grain Sorghum Protein Meal** as Tentative on page 413 of the 2023 OP, removing "Grain Sorghum Gluten Meal" in the 2025 *Official Publication*.

**T42.35 Grain Sorghum Protein Meal** is the part of the grain of grain sorghums that remains after the extraction of the larger part of the starch and germ, and the separation of the bran by the processes employed in the wet milling manufacture of starch or syrup Originally called Grain Sorghum Gluten Meal (adopted 1948, amended 1950, amended 2023). Remove "42.3 Grain Sorghum Gluten Meal" in the 2025 *Official Publication*.

**Board recommends acceptance. Josh Arbaugh moves; JoLynn Otero seconds; motion carries.**

viii. IDC recommends publishing an editorial change to **48.18 Hydrolyzed Corn Protein**, Gluten **Protein** on page 414 of the 2023 OP.

**48.18 Hydrolyzed Corn Protein** is the product resulting from complete hydrolysis of isolated corn ~~gluten~~ **protein**, and after partial removal of the glutamic acid. (Adopted 1956, revised 2023)

**Board recommends acceptance. Josh Arbaugh moves; Falina Hutchinson seconds; motion carries.**

ix. IDC recommends publishing **T48.135 Corn Protein Feed** as Tentative on page 416 of the 2023 OP, removing "Corn Gluten Feed" in the 2025 *Official Publication*.

**T48.135 Corn Protein Feed** is that part of the commercial shelled corn that remains after the extraction of the larger portion of the starch, protein, and germ by the processes employed in the wet milling manufacture of corn starch or syrup. It may or

may not contain one or more of the following: fermented corn extractives, corn germ meal. Originally called corn gluten feed (adopted 1936, amended 1960, amended 2023). Remove "48.13 Corn Gluten Feed" in the 2025 *Official Publication*.
**Board recommends acceptance. Josh Arbaugh moves; George Ferguson seconds; motion carries.**

x. IDC recommends publishing **T48.145 Corn Protein Meal** as Tentative on page 416 of the 2023 OP, removing 48.14 Corn Gluten Meal from industry use by 2025.
**T48.145 Corn Protein Meal** is the dried residue from corn after the removal of the larger part of the starch and germ, and the separation of the bran by the process employed in the wet milling manufacture of corn starch or syrup, or by enzymatic treatment of the endosperm. It may contain fermented corn extractives and/or corn germ meal. Originally called corn gluten meal (adopted 1936, amended 1960, name amended 2023). Remove "48.14 Corn Gluten Meal" in the 2025 *Official Publication*.
**Board recommends acceptance. Josh Arbaugh moves; Scott Ziehr seconds; motion carries.**

xi. IDC recommends publishing **T71.41 Low Glucosinolate High Erucic Acid Rapeseed Meal, Mechanically Extracted**** on page 451 of the 2023 OP.
**T71.41 Low Glucosinolate High Erucic Acid Rapeseed Meal, Mechanically Extracted,**** is the meal obtained after the removal of most of the oil by mechanical extraction of whole seeds obtained from the genus Brassica [*Brassica napus*, *Brassica rapa*, or *Brassica juncea*] from which the oil shall contain more than 2% erucic acid and the solid component shall contain less than 30 micromoles of any one or any mixture of 3-butenyl glucosinolate, 4-pentenyl glucosinolate, 2-hydroxy-3-butenyl glucosinolate, 2-hydroxy-4-pentenyl glucosinolate, and allyl glucosinolate per gram of air dry, oil free solid. When produced from *Brassica juncea* it must also contain less than 5 micromoles of allyl glucosinolates per gram of air dry, oil free solid. It must contain a maximum of 6% erucic acid, a maximum of 12% crude fiber, and a maximum of 30 micromoles of glucosinolates per gram. It is used in the diets of animals as a source of protein, not to exceed a 5% inclusion rate.
**Board recommends acceptance. Josh Arbaugh moves; Falina Hutchinson seconds; motion carries.**

xii. IDC recommends removing 73.200 Xantham Gum from the 2023 OP on page 466, and publishing **T73.200 Xanthan Gum** as tentative on page 468 of the 2023 OP, to allow its use as a suspending agent in plant inoculant products.
**T73.200 Xanthan Gum** as per 21 CFR 573.1010 is classified as a food additive as a stabilizer, emulsifier, thickener, suspending agent, or bodying agent in calf milk replacer and liquid feed supplements. Also per informal review processes, it can be used in canned dog and cat foods **and as a suspending agent in plant inoculant products**. Maximum inclusion levels are 0.1% in calf milk replacers (as fed), and 0.25% in liquid feed supplements and canned dog and cat foods, **and 2% in plant inoculant products.** (Proposed 2013, Adopted 2015 rev. 1, **Amended 2023**)
**Board recommends acceptance. Josh Arbaugh moves; Scott Absher seconds; motion carries.**

xiii. IDC recommends publishing an Addition to table 101.1 AGRN44 **Endo-1,4-Beta xylanase enzyme** on page 544 of the 2023 OP.

| AGRN (select for detailed record) | Notifier | Substance | Common or Usual Name | Intended Use | Intended Species | Date of Filing | FDA's Letter (select to view letter) |
|---|---|---|---|---|---|---|---|
| 44 (PDF, 424 pages) | BioResource International, Inc. | Xylanase enzyme prepared from *Komagataella phaffii* expressing the gene encoding | Endo- 1,4-β-xylanase enzyme | Utility information not evaluated for GRAS, see FDA's letter for more | Swine and Poultry | 2/25/21 | FDA has no questions. (PDF, 4 pages) |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | | xylanase from *Orpinomyces* sp. | | information. | | | |

**Board recommends acceptance. Josh Arbaugh moves; George Ferguson seconds; motion carries.**

xiv. IDC recommends publishing an Addition to table 101 AGRN 48 **Dried L-Valine Fermentation** on page 544 of the 2023 OP.

| **AGRN (select for detailed record)** | **Notifier** | **Substance** | **Common or Usual Name** | **Intended Use** | **Intended Species** | **Date of Filing** | **FDA's Letter (select to view letter)** |
|---|---|---|---|---|---|---|---|
| 48 (PDF, 1,119 pages) | CJ CheilJedang Corporation | Dried L- Valine Fermentation Product | Dried L- Valine Fermentation Product | To be used as a source of L- Valine in livestock and poultry feed. | Livestock and Poultry | 5/14/21 | FDA has no questions. (PDF, 4 pages) |

**Board recommends acceptance. Josh Arbaugh moves; Bailey Whiten seconds; motion carries.**

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

| **Action** | **Ingredient Name** | **Reference** | **Comments (meeting)** |
|---|---|---|---|
| New name and reference | Fumonisin Esterase | | Business meeting xx/xx/xxx |
| New name and reference | Endo-1,4-β-xylanase enzyme | | Business meeting xx/xx/xxx |
| New name and reference | Dried L-Valine Fermentation Product | | Business meeting xx/xx/xxx |

**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.

**Board recommends acceptance. Josh Arbaugh moves; Jacob Fleig seconds; motion carries.**

xvi. Publish changes to the feed term “Gluten” on page 357 of the 2023 OP.

**Gluten.** (part) The tough, viscid, and complex mixture of proteins remaining when the flour of wheat, rye, barley, or their crossbred hybrids, and derivatives thereof, is washed to remove the starch.

**Board recommends acceptance. Josh Arbaugh moves; Jamie Good seconds; motion carries.**

xvii. Publish T12.8 Barley Protein Concentrate as official on page 375 of the 2023 OP.

**12.8 Barley Protein Concentrate** is the dried protein fraction of barley prepared by enzymatic hydrolysis of starch, beta glucans, and fiber. The ingredient is prepared from barley that is dehulled or of a hulless variety. It must not contain less than 60% crude protein on a dry matter basis. The finished ingredient should not contain more than 10% moisture. It is to be used in the feed of fish as a source of protein. (Proposed 2022 rev. 1, adopted xxxx)” (delete tentative)

**Board recommends acceptance. Josh Arbaugh moves; George Ferguson seconds; motion carries.**

xviii. Publish an update to table 101.1 to include AGRN 42 on page 544 of the 2023 OP.

| AGRN (select for detailed record) | Notifier | Substance | Common or Usual Name | Intended Use | Intended Species | Date of Filing | FDA's Letter (select to view letter) |
|---|---|---|---|---|---|---|---|
| 42 Part 1 (PDF, 307 pages) Part 2 (PDF, 307 pages) | Native Microbials, Inc. | *Butyrivibrio fibrisolvens* ASCUSDY19 | Dried *Butyrivibrio fibrisolvens* Fermentation Product | Utility information not evaluated for GRAS, see FDA's letter for more information | Dairy cattle | 2/12/21 | FDA has no questions. (PDF, 3 pages) |

**Board recommends acceptance. Josh Arbaugh moves; Ben Jones seconds; motion carries.**

xix. Publish a replacement Official Definition **30.01 Fumonisin Esterase** on page 386 of the 2023 OP, immediately after the first sentence in section 30. *The first version was approved by the committee in August of 2022. Since the source of the language is a food additive regulation the new language comes in as official.*

**30.01 Fumonisin esterase**

The food additive fumonisin esterase may be safely used to degrade fumonisins in swine **and poultry** feed in accordance with the following prescribed conditions:

(a) Fumonisin esterase, a carboxylesterase, is produced by a nontoxigenic and nonpathogenic yeast, *Komagataella phaffii*, genetically engineered to express the fumonisin esterase gene from the bacterium *Sphingopyxis* sp. ~~The 403 amino acid fumonisin esterase enzyme acts to produce hydrolyzed fumonisin and two tricarballylic acid molecules~~. Hydrolyzed fumonisin and two tricarballylic acid molecules are the reaction products of fumonisin hydrolysis by this 493 amino acid fumonisin esterase enzyme.

(b) The additive shall meet the following specifications:
  (1) The fermentation media for the *Komagataella phaffii* shall not contain methanol.
  (2) Viable genetically engineered *Komagataella phaffii* shall not be present.
  (3) One unit of fumonisin esterase activity is defined as the amount of enzymatic activity required to release one micromole of tricarballylic acid (CAS 99-14-9) per minute from 100 micromolar fumonisin B1 in 20 millimolar Tris- hydrochloride buffer (pH 8.0) containing 0.1 milligram per milliliter of bovine serum albumin at 30 °C.

(c) The additive is incorporated at a minimum of 15 units of fumonisin esterase activity per kilogram of complete ~~swine~~ feed:
  **(1) Complete swine feeds cannot contain more than 10 parts per million of total fumonisins.**
  **(2) Complete feed for poultry being raised for slaughter cannot contain more than 50 parts per million of total fumonisins.**
  **(3) Complete feed for breeding poultry and hens laying eggs for human consumption cannot contain more than 15 parts per million of total fumonisins.**

(d) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act:
  (1) The label and labeling of the additive, any feed premix, and complete feed shall contain the common or usual name of the additive's source, dried *Komagataella phaffii* fermentation product.
  (2) The label and labeling of the additive and any feed premix shall also contain:
    (i) Adequate directions for use including a statement that the additive must be uniformly applied and thoroughly mixed into complete feeds;

(ii) A guarantee for the minimum amount of fumonisin esterase activity, expressed in accordance with paragraph (b)(3) of this section, and the unit of weight being consistent with the inclusion rate stated in the directions for use;
(iii) Appropriate warning and safety precaution statements concerning the additive as a respiratory sensitizer;
(iv) A cautionary statement concerning the maximum fumonisin content as established in paragraph (c) of this section.

21 CFR 573.485 (Proposed XXXX, Amended XXXX)

**Board recommends acceptance. Josh Arbaugh moves; David Dressler seconds. George Ferguson moves to amend the motion to remove the language that was struck. David Dressler seconds; motion carries.**

xx. Add the following statement to the header (preamble) of sections 40 (page 409 of the 2023 OP) and 60 (page 438 of the 2023 OP): "** This ingredient may contain materials that fit the Swine Health Protection Act's definition of "garbage" (i.e., meat resulting from food waste streams). If the product is intended for the feeding of swine or used in the manufacture of an ingredient intended for swine, manufacturers using these ingredients should adhere to the provisions of the Swine Health Protection Act where appropriate. (9 CFR Part 166- Swine Health Protection Act)

**Board recommends acceptance. Josh Arbaugh moves; Robert Tolton seconds; David Dressler would like to table this motion until the 2023 AAFCO Annual Meeting due to ongoing updates within the work group. George Ferguson seconds; motion carries.**

**Oregon and Maryland disagree.*

xxi. Mark these ingredients with a "**" to indicate a need to follow the swine health act: 40.96 Food Processing Waste, 40.97 Restaurant Food Waste, 60.108 Salvage Pet Food, and 60.117 Dried Black Soldier Fly Larvae.

**Board recommends acceptance. Josh Arbaugh moves; Richard Ten Eyck seconds; David Dressler would like to table this motion until the 2023 AAFCO Annual Meeting due to ongoing updates within the work group. Scott Ziehr seconds; motion carries.**

**Oregon and Maryland disagree.*

**b. Model Bills and Regulations Committee Recommendation:**

i. The Model Bills and Regulations Committee recommends the AAFCO Voluntary Self Inspection Plan (VSIP) Pilot Program Structure Section in Chapter Five of the printed 2023 *Official Publication* on pages 278-284 of the 2023 OP be deleted.

**Board recommends acceptance. Josh Arbaugh moves; George Ferguson seconds; motion carries.**

ii. The Model Bills and Regulations Committee recommends that Model Regulation 8 (c) 134 of the 2023 OP be modified as follows (new language **bold and underscored**). Non-protein nitrogen **ingredients** defined in the *Official Publication* of the Association of **American Feed Control Officials, when so indicated, are acceptable ingredients in** commercial feeds distributed to non-ruminant animals as a source of nutrients other than equivalent crude protein. The maximum equivalent crude protein from non-protein nitrogen sources when used in non-ruminant rations shall not exceed 1.25% of the total daily ration.

**Board recommends acceptance. Josh Arbaugh moves; Richard Ten Eyck seconds; motion carries.**

**c. Strategic Affairs Committee Recommendation:**

i. The Strategic Affairs Committee recommends editing the row "***Post Approved Minutes***" in **Table 4 BOD Post-Meeting Deadlines and Responsibilities** on page 94 of the 2023 OP to read "***Post approved minutes in FEED BIN***" "***From: DRAMF***" "***To: Members***" in order to match the language in **Table 2 – BOD Post-Meeting Deadlines and Responsibilities** in the 2022 AAFCO Procedures Manual on page 16.

**Board recommends acceptance. Josh Arbaugh moves; Bailey Whiten seconds; motion carries.**

ii. The Strategic Affairs Committee recommends these suggested changed regarding Life Member privileges. Excerpt from the OP with suggested changes (Guidelines, Page 101, 2023 OP):

1. (**unchanged**) To qualify for life membership a candidate must have met the following criteria or have performed meritorious service to the Association or to the principals of animal feed control determine by the AAFCO BOD to be equivalent of these criteria:
    i) The candidate shall have completed a minimum of eight (8) years active committee, investigator, seminar, task force or officer service; or a minimum of fifteen (15) years tenure in a member agency with semi-active or indirect service to the association.
    ii) The candidate shall have terminated his or her tenure as a feed control official and shall not have accepted a position in any feed control regulated business, trade or professional association servicing the animal feed industry.
2. **Nomination Procedure: (unchanged)**
3. **Assessment of Life Membership Nomination: (unchanged)**
4. **Pause of Benefits: (new language)**
    i) If the life member accepts a position with an external stakeholder (e.g., animal food industry consultant, representative of any animal food related trade or professional association, etc.) the life member must notify the President of AAFCO. The President will suspend the privileges of life membership until such time as the life member is no longer representing the external stakeholder.
    ii) If the life member refuses to suspend their privileges, the BOD may choose to suspend or revoke until such time as the individual again meets the condition of life membership as stated.

**Board recommends acceptance. Josh Arbaugh moves; Jacob Fleig seconds; motion carries.**

iii. **Strategic Plan 2023–2025 Finalized Goals and Objectives**

**Vision** – AAFCO is a trusted leader that safeguards animal and human health.
**Mission** – AAFCO is a collaborative association that supports members and stakeholders, and promotes a safe feed supply through unified system-based regulation, feed ingredient standards and laboratory operations.

**GOAL 1: Improve Organizational Infrastructure and Operations**
(Improve the organization's infrastructure and operations to be more effective and efficient and dynamic.)
Objective 1.1: Evaluate current AAFCO internal protocols and processes to enhance operational efficiencies (tabled to address in future)
Objective 1.2: Identify and develop organizational training for AAFCO leaders
Objective 1.3: Identify and pursue opportunities that improve financial management and advance organizational health

**GOAL 2: Enhance Member Support and Education Resources**
(Members are supported through the development of tools, resources, education, and other efforts.)
Objective 2.1: Be the leading resource of training for animal food regulators and laboratories within 5 years
Objective 2.2: Enhance membership through recruitment, support and sustainability

**GOAL 3: Advance Human and Animal Health and Safety**
(Regulatory and laboratory initiatives promote the health and safety of humans and animals.)
Objective 3.1: Promote and integrate Animal Food Safety Systems

Objective 3.2: Promote and integrate laboratory technology, methods, quality systems, and collaboration in support of Animal Food Safety Systems

**<u>GOAL 4:</u> Foster External Stakeholder Relationships**

(Relationships with external stakeholders are fostered to provide advancement opportunities for the Association.)

Objective 4.1: Identify stakeholders with common interests in order to prioritize, develop, and maintain professional relationships that advance AAFCO's Vision and Mission (tabled to address in future).

*Will not be in OP, but will be posted on the AAFCO Website.

**Board recommends acceptance. Josh Arbaugh moves; Richard Ten Eyck seconds; motion carries.**

**d. Nomination Committee:**

The Nominating Committee recommends the following slate for Board of Directors effective immediately.

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

**Board recommends acceptance. Josh Arbaugh moves; Bailey Whiten seconds; motion carries.**

**This concludes committee and board recommendations needing membership approval.**

**7. Credential Report: FASS**

Number of voting members represented:127, 38 agencies
Number of states in attendance: 45
Number of countries: 7
Number of FDA representatives: 53
Number of life members: 5
Total meeting attendance: 456

**8. Meeting Concluded at 9:48 am CT.**

# Current Issues and Outreach Committee Report

2023 AAFCO Midyear Meeting
January 17, 10:30–11:00 am CST, San Antonio, Texas

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

## Committee Participants

**Members Present: Jennifer Combs (KY) (Co-Chair), Jo Lynn Otero (NM) (Co-Chair),** Hollis Glenn (BOD Liaison), George Ferguson (NC), Josh Arbaugh (WV), Eric Brady, (TN), Nathan Moon (FDA), Jacob Fleig (MO), Bethany McAnulty (TN), Debra Gray (KS), Bernadette Mundo (SC),
**Advisors Present:** Steve Younker (AFIA), Dana Brooks (PFI), Bill Bookout (APPA), Louise Calderwood (AFIA), Emily Helmes (BiomEdit)
**Virtual attendees:** None

## Committee Report

The meeting started at 10:32 am with the welcoming/opening remarks by Co-chair Jennifer Combs. Committee updates were given including goals from the Strategic Affairs Committee and that a committee call will happen in February to assign workgroups to meet these deliverables. Tera with Philosophy presented on the unveiling of the new AAFCO website.
Jenny thanked the Ambassadors and committee chairs for their assistance in welcoming the first-time attendees.
First-time attendees were introduced to AAFCO.
**Other Business:** None
No further discussion or topics were brought to the attention of the committee and the meeting was adjourned at 11:00 am.

# Education and Training Committee Report

2023 AAFCO Midyear Meeting
January 17, 2023, 1:30-2:15 PM (CST), San Antonio, TX

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

## Committee Participants

**Members Present:** Marissa Kost – NC, David Dressler – PA, George Ferguson – NC, Jacob Fleig – MO, Kimberly Hull – FDA, Holly Jewell – SC, Kevin Klommhaus – FDA, Tim Lyons – MI, Bethany McAnulty – TN, Jo Lynn Otero – NM, Laura Scott (proxy) – CFIA, Angie Simmons – GA, Shaness Thomas – FL, Jim True – KY, Daniel Zangari – CO
**Advisors Present:** Amanda Anderson – PFI, Bill Bookout – APPA, David Fairfield – NGFA, Jillian Nash (proxy) – AFIA, Pat Tovey – PFI, Leah Wilkinson (proxy) – AFIA
**Virtual Attendees:** Danielle Borchert – MN, Traci Kelm – FDA (proxy), Rick Manthei – MN, Samantha Moran-Defty – CA, Kate Nelson – CT

## Committee Report

Marissa Kost (Chair) called the meeting to order at 1:37 PM (CST).

**Workgroup Updates**

- Leadership Training: Align WG with priorities out of Strategic Affairs (**GOAL 1, Objective 1.2** - Identify and develop organizational training for AAFCO leaders)

| | |
|---|---|
| **1.** Improve orientation and training for Committee Chairs and Board members.<br>***Priority 1*:** Develop a draft template compiling training needed and identify process to determine needs/wants (Develop a gap template).<br>• Identify work that has already been done and compile. Identify additional activities specific to the Board.<br>• Develop a checklist for duties and deadlines. Leverage the Official Publication (OP) info into a cheat sheet.<br>• Identify core training list for Committee Chairs, Board members, other leaders, and potential leaders. Examples include:<br>▪ Meeting facilitation<br>▪ Roberts Rule of Order<br>▪ Budget 101<br>▪ Strategic Thinking and Decision Making<br>▪ Exchange or shadow programs between states and with FDA (CVM or OHAFO Field)<br>***Priority 2*:** Develop an implementation framework. Leverage what has already been developed.<br>• Part of task should include identification of current training and needed training including onboarding steps.<br>• Ensure various roles are captured, e.g. FDA member, votes differently.<br>• Orientation on Committee Chair expectations, roles, responsibilities, interactions, reporting to the Board and other committees.<br>• Identify touchpoints – identify committee deliverables and flow. Assign to all committees and Board member to map.<br>• Identify leadership mentors as part of framework (orientation/onboarding and ongoing).<br>• Include ongoing training for leadership enhancement. | Gap template draft by Seminar 2023 and Committee vote Annual 2023<br><br>Fall 2023 - Short term |

| | |
|---|---|
| ***Priority 3*:** Develop a checklist to track implementation (ETC Sub-committee). | Fall 2023 |
| ***Priority 4*:** Identify leadership training (e.g. Linked In learning) available and develop AAFCO specific training based on Priority 1 for delivery.<br>• Develop for different delivery modalities (e.g. online and in person). | Fall 2023 |
| ***Priority 5*:** Implement training and tracking. | January 2024 |

- Training Endorsement Policy & Tables:
  - WG had finalized all documents and guidance documents; received some new comments and previous documents regarding some additional requested changes. WG plans to meet again within the month to review recommendation(s) and make any edits as necessary. Will send to committee for review and e-vote prior to Annual 2023.
- DigitalChalk Usage:
  - WG has been given a revised charge (December 2022) from the BOD.
    - Revised Charge**:** Review the service currently being provided by DigitalChalk and potential clients/systems that may be better options for moving forward. The recommendation from the ETC should be sent back to the BOD for approval prior to any RFP or changes being initiated.
- Training Curriculum Update:
  - Kimberly Hull (WG Chair) – After Annual 2022, WG got together to update the 2018 Coursework Curriculum documents (*Attachment A*) to reflect the new animal food resources and trainings available for Basic & Advanced [feed inspector]. Drafted a training path (*Attachment B*) to assist regulators in training preparation and planning. It has sequenced the training in a recommended learning path and provides clarity on training duration and modalities. Will be sent to ETC members for review and final e-vote for approval. Documents will be publicly available once approved.

**Training Availability Updates:**

- FDA OTED Training:
  - Kimberly Hull – In September 2022, Pathlore was replaced by LearnEd LMS. FDA LMS has more than just animal food basic and advanced coursework; has a large library of offerings to fulfill all training needs. Current schedules and pre-requisites for coursework in LearnEd LMS for FY23.
  - Traci Kelm – FY23 Schedule for vILT (VM102 cGMP: March, July; VM209 BSE: Jan, April, July; VM214 Medicated Feed: Jan, April, July; VM230 VFD: Jan, April, July; VM220 PC: Feb, May; VM201 Drug Residues in AF: May); VM220 will offer an in-person course in August 2023. State participants planning to attend OTED AF courses after April 30, 2023 will be required to complete the new FD8020W (Principles of Evidence Development for Local and State Regulators). OTED will also be offering two in-person CS124 (Electronic State Access to FACTS (eSAF)) courses in April (San Diego, CA) & May (Durham, NC). OTED is reviewing the vILT training options and some select courses may be offered virtually and in-person this Summer & Fall. In November 2022, FDA and State personnel participated in a Job Task Analysis (JTA) meeting – more information about the final JTA report will be shared during Annual 2023.
    - Will the FD8020W course be a required pre-requisite for all FDA courses?
      - Only for AF courses such as VM102, VM209, VM214, VM220, VM230
    - Is FD8020W a new course or similar as the one in ComplianceWire?
      - Will need to take the new course; previous versions will not be accepted in lieu of this course as a pre-requisite.
    - Will the FD8020W course fulfill the following requirement (evaluate and provide any necessary improvements to the feed program training plan for evidence development) listed in the PC continuation grant for AFRPS? – awaiting final answer from FDA

- Other training updates are provided during other committees:
  - Industry Updates (FFIMC)
  - AITS & BITS Updates (ISC)

**Sub-Committee Updates:**

- Feed Administrator's Seminar (FAS) Sub-Committee:
  - Will be held in Fontana Dam, NC during the week of May 15-19th
    - Travel dates: May 15th and 19th; Meeting: 16-18th
    - Limited on space, so there may be some restrictions on number of attendees/state
  - 2024 location will be hosted in SC
- Midyear/Annual Sub-Committee:
  - **GOAL 2, Objective 2.2** - Enhance membership through recruitment, support and sustainability.

| | |
|---|---|
| **5.** Transfer the Event Planning Workgroup to a new Subcommittee to oversee midyear and annual meeting. Similar to Seminar Subcommittee. This becomes an ongoing subcommittee.<br>• Confirm members of Subcommittee complete with chairperson. Evaluate attendance and consider meeting evaluations to assess meeting relevance / success to members. Ensure timely development of meeting agendas. | January 2023 |

  - Transferred from ETC to CIOC w/ FASS; CIOC has requested 2-3 ETC members to participate in this sub-committee. Bethany McAnulty has volunteered as 1 of those members. Opportunity to help plan midyear/annual AAFCO activities for new attendees.

**Workshop Calendar Request Updates:**

- Due to Jacob Fleig's departure, please send all Feed BIN calendar requests to Marissa Kost until a replacement is identified.

**New Business:**

- **GOAL 2, Objective 2.1 -** Be the leading training resource for animal food regulators and laboratories within 5 years.

| | |
|---|---|
| 3. Develop and conduct an annual committee survey for laboratories to include with that of animal food regulators to determine training needs that can be delivered in concise timeframes (e.g. 1 - 2 hours).<br>• Conduct an annual survey and create a list of training priorities for review by the Board for approval and implementation. Need to investigate and coordinate with FDA annual survey (animal food regulators; confirm not lab). Board will review and make assignments at their September Board meeting. Board will assign to appropriate committees (October 2023). Develop a documented process for proponents to identify training needs on an ongoing basis (e.g. outside of the survey timing). | Survey conducted Annual 2023 |

- WG needs to be formed in order to complete this task out of SAC.

**Adjourn:** 2:15 PM (CST)

## Action Items

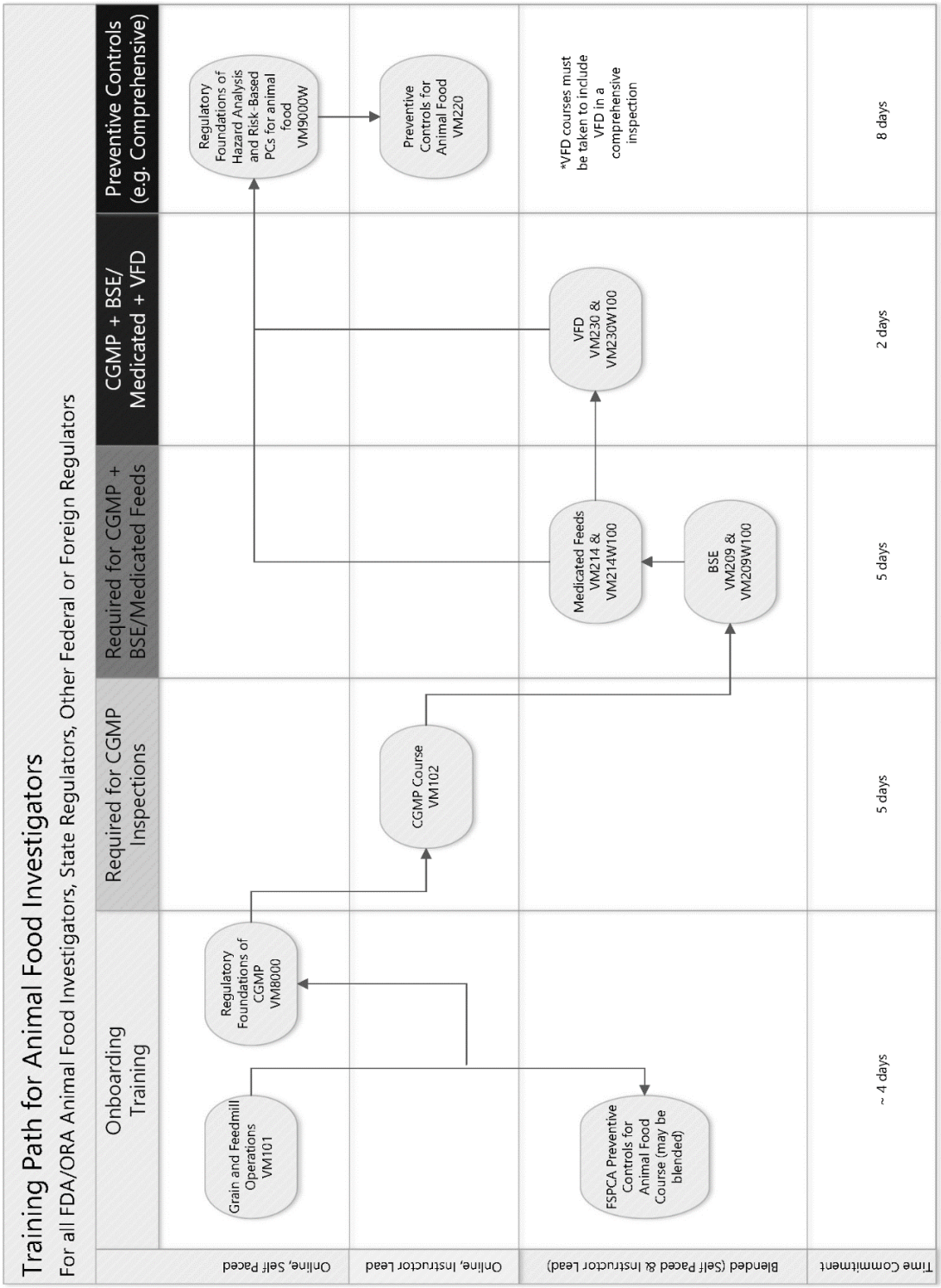
| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| Marissa Kost (Chair) | (CIOC) Midyear/Annual Sub-Committee | 1-2 additional members required | ASAP |
| Marissa Kost (Chair) | Training Curriculum Update WG Documents | Send draft documents to ETC members for review/approval; e-vote | March 2023 e-vote |

| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| Leadership Training WG | Review task from SAC and deliverables | Draft Gap Template; framework, checklist, identify training; implement/tracking. | May 2023- Gap Template<br>Fall 2023-Prior. #2-4<br>Jan 2024-Implement/Track |
| Training Endorsement Policy WG | Finalize all documents for review for OP | Review additional suggestions, guidance docs prior to finalizing docs | e-vote prior to Annual 2023 |
| DigitalChalk Usage WG | Revised Charge from BOD | Recruit members, review revised charge from BOD, schedule meetings, solicit feedback of LMS, provide recommendation to BOD. | Annual 2023-update/final |
| Laboratory Survey WG | Review task from SAC and deliverables | Recruit members, review task out of SAC, develop survey | Annual 2023-survey conducted<br>Oct 2023-results to BOD |

## Attachment A: 2022 Coursework Curriculum (12/20/2022)_Draft

See ETC 2022 Coursework Curriculum 12.20.2022_draft.docx on website.

## Attachment B: Training Path for Animal Food Investigators Guidance




**Minutes approved 03/03/2023. 12 voting in the affirmative.**

# Feed and Feed Ingredient Manufacturing Committee Report

2023 AAFCO Midyear Meeting
January 17, 2:15–3:00 pm, San Antonio, Texas

## Committee Recommendations to Board and membership: None

## Committee Action Items:

1. FSMA Implementation Task Force – Working Group 3
   Create action plan to determine the processes of implementing the decision making and method development.
2. Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections:
   Perform gap analysis of FSPCA training for inspectors to determine if AAFCO needs to provide additional training for state inspectors.

## Committee Participants

**Members Present:** Charlie Hubenka – NE; (Co-Chair); Ken Bowers – KS (Co-Chair); Ben Jones - TX; Eric Brady – TN; Laura Scott – CFIA; George Ferguson – NC; Dr. Jonathon Roberts – LA; Jessica Gore – NC; Trish Dunn – IN; Jeff Jones – KS; Justin Henson - FDA.
**Via Telephone:** None
**Advisors Present:** Pat Tovey – PFI; Amanda Anderson – PFI; Louise Calderwood – AFIA; Charles Starkey - NARA; Matt Frederking – NGFA; Linda Morrison – LIFE; James Emerson – US Poultry Association; Dan Frank – AFIA; Kathy Alinovi – NGPMA; Emily Helmes – Biom; Bill Bookout – APPA; Chad Witmer – PA; Linda Morrison – Life.

## Committee Report

Ken Bowers called the meeting to order 2:20 pm. Members and advisors in the room introduced themselves.
**Introductions and Agenda Review, Ken Bowers, and Charles Hubenka**
**NEW MEMBERS:** None

**Review of Action Items**
**Mineral Guidelines Working Group – Therrell**
This was finalized and approved during business meeting of Annual Meeting in August 2022.
**FSMA IMPLEMENTATION TASK FORCE UPDATES**
**Working Group #3 – Contaminant and Hazard Lab Strategy - Brady**
*Working Group Charge: Following the identification of contaminants and hazards by FSPCA/FDA, the group will determine action levels and enforcement strategies to provide guidance to the Lab Methods and Services Committee (LMSC) in order to develop a priority list of method development. This Working Group will work in consultation with the FSPCA, Enforcement Issues Committee, Inspection & Sampling Committee, Ingredient Definition Committee and the LMSC*
Sharon Webb Co Chair Lab services committee – Reported on the survey. 29 responses. “Top 10” Results were presented and can be found on the Bin. Full results to be presented at 2023 Annual meeting in Baltimore. Regulatory should still work with lab to prioritize methods.
Brady – This will be an annual survey. Form will be on the new website. Will be able to receive results in a timely manner. Not a lot of change with the survey results.
**Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections - Brady**
*Working Group Charge: Review materials developed by FSPCA and FDA to determine whether training material for feed ingredient manufacturing from the FSPCA will meet the needs of Inspectors in regards to training. Working group will work in consultation with the Education & Training Committee and the Inspection & Sampling Committee*
Brady - Standardized Advanced Inspector Training, inspectors were provided good foundation. Ingredient Verification tool was demonstrated for inspectors. Real life scenarios were utilized for

veteran inspectors. Gained positive response. Will continue using tool moving forward. Skillsets are being built. CO will host the 2023 AITS in June.

**Canadian Food Inspection Agency Update - Laura Scott**

- The CFIA is continuing to work towards final publication of updated Canadian Feeds Regulations, with a target of Summer 2023.
- When the updated regulations are published some of the changes will come into effect right away, while others will be delayed.
- Changes respecting labelling, standards and product registration will come into effect immediately, but will have a one-year transition period that will allow regulated parties to follow either the old rules or the new ones.
- New requirements with respect to hazard analysis and preventive control plans will come into effect one year after publication of the regulations.
- New requirements with respect to licences will come into effect 18 months after publication of the regulations.
- The CFIA is preparing guidance and planning outreach activities to help support regulated parties with the updated regulations.
- The CFIA has also been working on a number of other activities
    - The MyCFIA application portal has been fully launched. Applications for feed registration and approval can now be made on-line. Companies are encouraged to submit their applications here.
    - A database of registered products is in development and will be available on the web
    - Updated guidance on acid-based products and new guidance on data flexibility are available on the CFIA website.

**Industry updates –**

Pat Tovey PFI, -

- Hosted PFI's annual meeting in December. Well attended, met their goals. Next year's meeting will be December 3-5.
- IPPE - Will be hosting training along with sister associations, aiming to assist farms to generate USDA/APHIS inspection packages for trade.
- PFI planning to provide comments at FDA public information hearing regarding Ingredient Definition Process.

Louise Calderwood AFIA

- Hearing from feed and feed ingredient manufacturers of need for 7-year discretionary period for Pet Food Label Modernization.
- Appreciate input received from states from survey. States are in good shape financially, but legislators tend to steer fees collected from industry to uses other than for regulation. Understand that it is not necessarily the regulators doing this, and appreciate that, but want to reiterate that it is frustrating for industry to pay fees that go elsewhere and not to regulation purposes.
- PFAS – states are all over the board or regulating these in packaging.
- Working closely on sustainability messaging. Making sure their industry members have valid tools to measure their sustainability.
- PCQI course offered in July in Nashville, TN. Check website for more.

**Other Business:**

**Nutrient Contaminant Workgroup**

Committee needs to decide whether to continue with this workgroup. Austin has all the documents that were developed if we want to continue. Charlie and Ken will look at the charge and decide direction. The board in 2021 charged FFIM to put together some model contaminants and hazards so this workgroup was formed. Workgroup met 3 or 4 times and started with nutrients that if used at an excess of normal use level could be considered hazardous. They identified some nutrients that were tied to recalls. That's as far as the workgroup has gotten.

Tovey - Concerned that too much effort would be going into something that is already out there or taking place of contacting state veterinarian/toxicologist. Is there merit to going forward with this workgroup? Industry seemed to not see the value.
Therrell – A focus around the workgroup was they didn't want to re-invent the wheel. There is a lot of toxicology information out there. Wanted to try and get this information in one spot for convenience. Committee needs to decide whether to continue.
Alinovi – Concerns regarding possible contaminants in organ meats in fresh food diets. Would like the workgroup to continue.
**Consideration to review the voluntary self-inspection program in Section 5 of the OP.**
VSIP working group tasked with review of National Medicated Feed Program section pg. 258 - 263 of the 2023 OP and remove references to the VSIP. VSIP was removed from the OP. Hubenka to lead workgroup.
Workgroup
Charles Hubenka
Ben Jones
Eric Brady
Jonathon Roberts
Dave Fairfield
**NEW BUSINESS-**
**Edits in OP to Official Guidelines for Contaminants Levels Permitted in Mineral Feed Ingredients.** Jennifer Kormos. Formed a work group to go over document to edit for clarity, not change content. Trish Dunn IN, Charlotte Conway CVM, KC Gutenberger CDFA.
**Definitions differences** – Complete feed, total diet, concerns with Chapter 5 Table 3. Louise Calderwood. Table 3 is suggested guidelines for contaminants. Understanding there is flexibility in the definition of complete feeds they withdraw any request for change to tables. No working group requested. Would like to continue thinking about possibly revisiting in the future, as definitions (finished feed, complete feed, total diet, etc.) are developed.
**Strategic Plan assignment for 2023 – 2025.** Discussion/workgroups. Linda Morrison
3.1 Chairs from FFIMC, ISC, and EC will go through and identify the road map to promote an integrated food safety system. Once tasks are figured out Committee chairs will bring back assignments for workgroups.

**Action Item Table**

| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| Mineral Guidelines Working Group | Mineral Guidelines | To review and revise the "Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients".<br>Working Group: Bill Burkholder (lead) | **Approved** |
| FSMA Implementation Task Force – Working Group 3 | Hazard & Contaminant Action Levels and Lab and Enforcement Strategies | Work with FSPCA, EIC, ISC, IDC and LMSC to develop a prioritized list of method development once list of contaminants and hazards has been identified by the FSPCA and FDA.<br>A plan of action should be created by the working group to determine the processes of implementing the decision making and method development. | Update: August 2023 |
| FSMA Implementation Task Force – Working Group 4 | Inspector Training Development | Gap Analysis performed on FSCPA training to determine if there is any missing education that should be provided to inspectors who perform feed ingredient manufacturing inspections | Update: August 2023 |

**Meeting Adjourned.**

# Ingredient Definitions Committee Report

2023 AAFCO Midyear Meeting
January 18, 8:00–9:30 am CST, San Antonio, Texas
January 19, 8:00–9:30 am CST, San Antonio, Texas

## Recommendations to the Board and Association Membership

1) Publish the new feed term **"Freeze Dried"**
2) Publish a New Official Definition: **T33.29(A) Black Soldier Fly Larvae Oil** to Official and replace existing official definition.
3) Publish a New Official Definition: T36.11 ____ Dried Fermentation Product to Official- relating to organisms to allow the use of *Lactobacillus diolivorans* as a silage inoculant. Replace existing official definition
4) Publish an amended **Swine Health Protection Act guidance language** in Sections 40 (page 409) and 60 (page 438) of Chapter 6.
5) Add the **Sunsetting Language** to the "Guide for Submission" at beginning of Chapter 6
6) Make the following changes in ODI: (tentative ingredients do not go into ODI) **
   IDC Meeting Date: 1/18/2023
   ODI Summary of Changes for OP

| Action | Ingredient Name | Reference | Comments (meeting) |
|---|---|---|---|
| New Name and reference | ***Black Soldier Fly Larvae Oil (To Official)** | T33.29(A) | Business meeting xx/xx/xx |
| New Name and reference | * **____ Dried Fermentation Product (To Official)** | T36.11 | Business meeting xx/xx/xx |
| New Name and reference | | | Business meeting xx/xx/xx |

**ODI updating—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.

## Board Action:

Recommendations to be considered in April 2023

## Association Action:

Recommendations to be considered in August 2023

## Recommendations Not Needing Further Association Review

Editorial Changes to Chapter 6

1) **36.14 Direct Fed Microorganisms-** updated to reflect nomenclature changes. Date of Compliance of January 2023. This change affects *Pediococcus cerevisiae (damnosus)* and was accepted by IDC in August 2019
2) Hold Investigator Training on the ODI -Jennifer Kormos will coordinate the training with help from Dave Dressler (Feed Labeling Committee) and George Ferguson (Technology Committee).

## Referrals to Other AAFCO Committees: None

**Committee Report**

Minutes IDC January 18, 19, 2023

The Committee met in person and virtually with over 400 attendees. Committee member roll call on Google Doc was Displayed. A quorum was present with 26 out of 30 voting members present including Richard Ten Eyck, Laura Scott, Charlotte Conway (FDA), Ken Bowers, Erin Bubb, Stan Cook, Dave Dressler, James Embry, Ashlee-Rose Ferguson, Jacob Fleig, George Ferguson, Falina Hutchinson,

Darrell Johnson, Ali Kashani, Alan Keller, Dan King, Nathan Price, David Snell, Jennifer Kormos, Trish Dunn, Bailey Whiten, Kent Kitade, KC Gutenberger, Bernadette Mundo, JoLynn Otero, Katie Simpson, Mark LeBlanc, Shannon Jordre, Ashley Shaw
Absent: Josh Arbaugh (Lab committee) Cory Skier, Tom Phillips, Maggie Faba
There were some minor edits with membership

## OP Content

1) "Finished Feed" as a new feed term - Cynthia Scholte gave a detailed presentation on behalf of the work group. (See presentation in IDC's Feed Bin Library for Midyear January 2023)
   The terms "finished feed" and "complete feed" are used throughout the AAFCO OP definitions and in the CFR. In many cases, the regulations and definitions limit the amount of an ingredient in finished or complete feed. The key question is: What is the difference between complete feed and finished feed? Are they the same or different? The shared presentation covers the main speaking points. In conclusion, the workgroup recommended: (1) establish a new feed term for finished feed, as specified in the presentation; (2) review the CFR and OP to assess whether the terms complete and finished feed have been used correctly; and (3) revise the CFR regulations and OP definitions as needed. Since this information is being presented for the first time to IDC, the workgroup further recommended that this proposed new definition be reviewed and considered by members and all stakeholders prior to any action being taken.
   During discussion it was pointed out that acceptance of this definition will create a significant workload for FDA and AAFCO in that the many of the references to finished and complete feed in the AAFCO OP and the CFR will need to be scrutinized and potentially amended. A suggestion was made to focus only on instances when there is a limit on the percentage of an ingredient to be used in finished or complete feed. The rationale is that limits on level of use could relate to feed safety.
   The IDC agreed to consider the WG proposal at the IDC webinar in March 2023.
2) "Freeze Dried" Publish new feed term- Ali Kashani presented the proposed new term. Jacob Fleig moved to accept this term. Mark LeBlanc seconded. **Motion passed.** Attachment A
   The WG wants to shift focus and work on revised feed terms for raw and fresh and on a new term for pasteurization. James Embry is interested in joining the WG. Additional terms include "total ration" and "total diet".
3) T33.29(A) Black Soldier Fly Larvae Oil to **Official**- Bernadette Mundo presented. Mark LeBlanc moved to accept the definition. Ken Bowers seconded. **Motion passed.** Attachment B
4) T36.11 ____ Dried Fermentation Product to **Official**- relating to organisms to allow the use of *Lactobacillus diolivorans* as a silage inoculant. Replace existing official definition- Charlotte Conway presented for Maggie Faba.
   This definition will replace the current Official and include a change.
   Mark LeBlanc moved to accept the definition. Ali Kashani seconded. **Motion passed.** Attachment C
5) Modification to **Swine Health Protection Act (SHPA) guidance language** in Sections 40 and 60. Will replace current SHPA guidance language subject to association vote. - Erin Bubb presented.
   At the January 17th business meeting, guidance language was tabled by the membership until August. The IDC was presented with **modified** guidance language instead at this meeting. If moved forward, the membership vote will occur in August.
   The WG was comprised of FDA, USDA, States, and Industry
   Dave Dressler moved to accept the WG report. Shannon Jordre seconded. **Motion passed**. Attachment D
   George Ferguson moved to accept the proposed new language. Stan Cook seconded. **Motion passed.** Attachment D
   A modification to add 4 asterisks (****) to the ingredients:
   40.96 Food Processing Waste****
   40.97 Restaurant Food Waste****
   60.108 Salvage Pet Food****

60.117 Black Soldier Fly Larvae****
for referencing the SHPA guidance language, as recommended by the WG, was made. George Ferguson moved to accept. Falina Hutchinson seconded. **Motion passed.** Attachment D

**Editorial Changes:**

6) 36.14 Direct Fed Microorganisms updated to reflect nomenclature changes. Date of Compliance of January 2023. This change affects *Pediococcus cerevisiae (damnosus)* and was accepted by IDC in August 2019. Charlotte Conway presented for Maggie Faba.
This DFM nomenclature change is part of the sunsetting plan. Because the compliance date has been noted in the OP, this change does not need to be voted on by membership in August. David Dressler moved to accept. Jacob Fleig seconded. **Motion passed.**
Modification changes are going to Membership for vote. Editorial will not.

**Informational Updates**

7) Fish Definition: Seeking Feedback for a new definition- Charlotte Conway led the discussion. While working on the pet food label modernization, it was raised that the OP does not have a definition for the term **Fish**, and it was thought to be beneficial to have a definition.
Charlotte asked if anyone in Industry or the States have definitions or terms that define fish and how fish should be scoped (keep examples of "meat" and "poultry" in mind for scope), she would appreciate their sending them to her. This is not a request for data but rather on identity.
FDA plans to come forward with a proposal in August and may hold a WG call as needed. Justin Hill was named the new Marine Products Investigator, and he will be involved in the process.
8) FDA Virtual listening session on February 9. Charlotte Conway presented that FDA-CVM is holding a virtual meeting to discuss CVM's engagement with AAFCO on the ingredient definition process. CVM has in the past received criticism on how this process is working. CVM felt that they needed to ask more questions of stakeholders to determine how to work in the future.
Past external requests have included to improve clarity and transparency in the process. CVM and AAFCO will be presenting to ensure all stakeholders understand the process and then will seek verbal and written input from all stakeholders. Speaker registration closed last week; however, the docket will be open for written comments until March 9. CVM will be reviewing all the comments and will consider updates to the AAFCO/FDA MOU and perhaps development of new industry guidance as potential outcomes. Registration to attend this virtual meeting is still open. Docket Link for comments.
9) Sunsetting workgroup report. Charlotte Conway/Ken Bowers
    a) Workgroup report on sunsetting (withdrawing) procedures for common or usual names in the OP. The scope of this workgroup may be expanded to include how to change a common or usual name.
    The WG leveraged from the experiences with DFM name changes and gluten-to-protein changes to prepare the proposed procedures.
    George Ferguson moved to accept the WG report. Ken Bowers seconded. **Motion passed.** Attachment E
    In the discussion, it was acknowledged that some edits may be needed to fit this sunsetting language into the Guide. Though editorial changes do not need membership vote, it might be good to have them reflected in the business meeting.

George Ferguson moved to accept the recommendation to publish the WG-proposed language in "A Guide to Submitting New or Modified Ingredient Definitions to AAFCO" in the OP page 345. Ken Bowers seconded. **Motion passed.** Attachment F

**ODI Maintenance**

10) ODI Subcommittee report -Jacob Fleig
11) ODI procedures - Jacob Fleig
The procedures are in the BIN and are ready for the investigators to pilot.
Update: Investigator training?
Richard Ten Eyck and Jacob Fleig have been working on the process of building an excel file for ODI changes.

Investigators are the experts on what needs to be done to the definitions. It is proposed that the investigators need to be trained on how to prepare the updates in ODI. Separate virtual training for investigators will be coming soon.
Jennifer Kormos will coordinate the training with help from Jacob Fleig, Dave Dressel, and George Ferguson.
*Chairs recessed committee, January 18th at 9:30 AM CT
*Chairs start second day of the meeting on January 19th at 8:00 AM CT
Committee member roll call on Google Doc was Displayed. A quorum was present with
Committee member roll call on Google Doc was Displayed. A quorum was present with 26 out of 30 voting members present including Richard Ten Eyck, Laura Scott, Charlotte Conway (FDA), Ken Bowers, Erin Bubb, Stan Cook, Dave Dressler, James Embry, Jacob Fleig, George Ferguson, Falina Hutchinson, Darrell Johnson, Ali Kashani, Alan Keller, Dan King, Nathan Price, David Snell, Jennifer Kormos (no vote), Trish Dunn, Bailey Whiten, Kent Kitade, KC Gutenberger, Bernadette Mundo, JoLynn Otero, Katie Simpson, Josh Arbaugh, Shannon Jordre (FDA no vote), Mark LeBlanc, Ashley Shaw
Absent: Cory Skier, Tom Phillips, Maggie Faba, Ashlee-Rose Ferguson

**Informational Updates**

12) Animal Protein WG report. Stan Cook presented the report Attachment G
Current definitions may not capture current technological advancements on how the ingredients are processed.
The WG seeks comments on the proposed revisions to the definitions presented.
**Meat and Bone Meal** definition was discussed for modification. Stan presented the draft definition. No action taken.
March 2nd IDC virtual meeting may have the proposed definition of **Meat and Bone Meal** introduced for committee consideration.
The **Recovered ____ food** definition is recommended to be moved to Dave Dressler. The definition would replace **40.97 Restaurant Food Waste** and **40.100 Recovered Retail food**.
**"Recovered _____ Food"** Discussion: Options to have "with meat" or "without meat" needs to be part of the solution. For any comments on the draft definition, please reach out to Dave Dressler.
For **Recovered Household Food**, California, Oregon, and CVM will work with Dave Dressler on this definition. A proposed definition is expected at the August meeting.
Dave will have something to present at the August IDC meeting.
Next was a discussion on "organ" definition. How will the "organ" definition work with the "meat by-products" definition? One would still be able to use the meat by-products definitions.
The WG still needs to work on these definitions.
Ken Bowers moves to accept the WG report. Jacob Fleig seconds. **Motion passes**. Attachment G

13) Common Food Index Portal, Next steps- Erin Bubb reported that the CFI subcommittee will be meeting to discuss the first round of Common Foods and the development of the submission portal. Until the time it is created, Common Food inquiries and submissions can be sent definitions@aafco.org

14) Hemp update -Falina Hutchinson provided the update.
Hemp seed meal is currently under review at FDA. Hemp Feed Coalition has submitted a response to questions to FDA last week, which contains an additional study that was suggest by FDA. FDA has the response for review.
ASM will be hosting a follow-up virtual workshop on cannabidiol analysis on April 24 and 25.

15) Ingredient Submission Workshop- Meagan Davis provided information on the in-person workshop and the on-line modules.
The training had 130+ attendees (including FDA, state, and industry volunteers). The online modules can be found at the AAFCO learning management system (LMS). A link to the AAFCO LMS will be available on the new AAFCO website under the Resources tab. Issues accessing online modules have been noted. If you are experiencing any trouble with the modules, please submit issues through aafco@aafco.org.

Appreciation to the IDC committee, AAFCO, CVM, and the industry volunteers was expressed. Overall, it was a good sharing of information.

16) Ingredient submission modules - George Ferguson provided an update. https://aafcolms.digitalchalk.com/learn/animal-feed-ingredient-submission-course-1 Comprehensive on-line training course is part of the AAFCO LMS. If you have not taken the courses, consider doing so. The new AAFCO website will have links to easily access AAFCO's LMS or you can access through the link above. Any issues, contact aafco@aafco.org. More training content will be added to the AAFCO LMS.

17) Algae Biomass Organization (ABO) presentation -- Dr. Jesse Traller gave a presentation on behalf of the ABO. Presentation is in the BIN under the Ingredient definitions library folder; Midyear January 2023.

**Announcements**

A. Next Meetings: Virtual March 2, 2023
The education topic for Annual meeting in August will be **Recovered Food.**
Pre-, Pro-, and Postbiotics will be a future topic.

B. New Investigators Needed:
   a. Marine Products - Justin Hill
   b. Amino Acids
   c. Enzymes – Marissa Kost
   d. Fermentation Products
   e. DFM
   f. Technical Additives- Dave Snell
   g. Special Purpose Products
   h. Preservatives

C. **Stale Ingredients:** The following are being removed from consideration as definition requests. Please submit a new request if still desired.
   **a. Faba beans- Pulse Ingredients**
   Stale ingredient to be removed.

D. Parking Lot topics:
   a. 30.01 Fumonison Esterase- Remove extra sentence in paragraph A to match regulation. **(Done)**
   b. Complete gluten review. Dan King has completed this review and will provide an update at the March meeting.
   **c.** ICG workgroup report – not met since June 2021. **The workgroup was dissolved.**
   d. NANP Subcommittee report –have not met -Ashley Shaw /KC Gutenberger /Al Harrison
   The committee is on standby.
   e. 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 quantitively consumer panel tested preferably at the same time as the PFLM changes.* **NEED UPDATE, Review?** There is nothing additional. Richard Ten Eyck moved to remove this item from the parking lot list. Falina Hutchinson second. **Motion passed.**
   f. Pursue formal MSBC Definition. **Nothing in motion**
   g. Fluorine levels in model bill. Tom Phillips (lab) and Jennifer Kormos (IDC) and FIFM (Ken Bowers) form a workgroup to look at impact of testing and definitions parse out questions for the appropriate committees concerning Flourine vs fluoride. *(975.08 AOAC method for fluorine. There are challenges in the methods in animal food and lab capacity. Do we need to send a methods request to LMC? Should Fluorine (gas) be changed to Fluoride in the feed law?* (Stan) IDC should look at mineral definitions that have fluorine specifications. May also be in CFR definitions) **Workgroup formed was formed and will meet.**
   h. New feed term Total Ration, Total Diet, Raw, Fresh, Pasteurized. **Ali Kashani**

Richard Ten Eyck noted that there will be more coming from the Model Bill committee.

i. Proper use of process terms. Ali Kashani will present at the August meeting.
j. Next IDC speaker/presenter? Suggestions for topics include Pre, pro, and postbiotics. Request for presentation on cricket rearing for feed ingredient purpose.

END SESSION TWO Meeting Adjourned 9:30 AM CT
See attachments: A, B, C, D, E, F, G
Minutes approved 03/02/2023. Following members did not vote: Josh Arbaugh, Cory Skier (Not Present)

## Attachment A

**Freeze Dried.** (process) Freeze dried, also known as lyophilized or cryodesiccated, is a low temperature dehydration process that involves freezing the product, lowering pressure, then removing the water/moisture by sublimation. Product must be dried to reach a moisture and/or water activity level needed to be shelf stable.

## Attachment B

**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, finfish feed, **and adult dog food** 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”.

## Attachment C

**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.]

## Attachment D

*Swine Health Workgroup Recommendation.*
*Modify page 409 & 438 by adding this Guidance language:*
***This ingredient may contain materials subject to the Swine Health Protection Act and may require additional processing controls, if fed to swine. Prior to the use of this ingredient for the feeding of swine or its use in the manufacturing of an ingredient or feed intended for swine, manufacturers and/or feeders should adhere to the provisions of the Swine Health Protection Act where appropriate. (9 CFR Part 166-Swine Health Protection Act)*
Reminder:
This language will appear in the preamble of **sections 40 and 60** and the following ingredients in those sections will be marked with a double asterisk:
40.96 Food Processing Waste
40.97 Restaurant Food Waste
60.108 Salvage Pet Food
60.117 Black Soldier Fly Larvae
If Committee accepts this language, it will go to the Board as a recommendation and then to membership in August 2023 for consideration at the Annual business meeting. If accepted, it will replace the guidance language tabled by membership at the January 2023 business meeting.

## Attachment E

Sunsetting Workgroup Report
2022 workgroup participants:
Charlotte Conway, Leah Wilkinson, Kristi Smedley, Jean Hofve, Dave Fairfield, Dave Edwards, Maggie Faba, James Emerson, Pat Tovey, Carlos Gonzalez, Ken Bowers
After a call and further email discussion, the workgroup recommends the following:
**Add to the existing edit/removal policy in the procedures manual:**
When the revision includes a modification or change to the ingredient name, the old name should be removed through a sunsetting process which will provide time for the old name to expire and for transition to the new name to occur. The sunset date should be printed at the end of any ingredient that would need to be sunset in a bold parenthetical so that the section editor can easily identify any ingredient name that needs to be deleted in their annual review. The date should typically be 2 years unless the situation warrants a longer sunset period. A new ingredient number shall be assigned to the new name, and the date and action of change shall be noted in the parenthetical revision history [e.g., (proposed 1999, adopted 2000, name amended 2022)]. In the case of microorganism nomenclature changes, the new name shall be added after the old name. In definition 36.14, the new name will also need to be added on its own line if it is not currently listed. The old name will be deleted upon completion of the sunsetting period.

## Attachment F

*Revised Draft 2/14/23 replace bold, italic language*

**A Guide to Submitting New or Modified Ingredient Definitions to AAFCO**

Section Editor—Dani Naylor, FASS

The following guide is offered to assist in development of new or modified feed ingredient definitions. The roles of each party are described below. The definitions should be non-proprietary as not to favor one ingredient producer over another. Materials to be used as feed ingredients should have the following attributes: They should be consistent batch to batch. The material should not be a combination of other ingredients. The intended use should not be to mitigate, treat, or diagnose a disease **(other than a nutritional deficiency)**, but rather to provide nutrition, flavor, aroma for the animal or provide a technical effect in the feed. It is the manufacturer's responsibility to produce a safe ingredient for its intended purpose.

**The Requester**

Prior to submitting a request for a new or modified definition, the requester (industry, public, regulatory official, etc.) should consider the current ingredient definitions and develop a draft definition that includes the intended use. The requester should then contact the appropriate investigator (see the AAFCO *Official Publication* or website for current listing) by email to definitions@aafco.org to discuss the draft definition. Following the initial discussion, a requester should then make a request to the investigator in writing that contains the information described below, if pertinent, so there is sufficient information for the decision process:

1) Firm and contact person.
***2)*** Summary of the request, including name of the ingredient, intended use, and rationale for the request. ~~A~~ ***The proposed name shall:***
    a) Not contain commas.
    b) Begin with the base material and then list any needed qualifiers (Beet Pulp plain dried).
    c) Be in alignment with common or usual name conventions in 21 CFR 502.5(a).
    d) Alternate names to be used on labeling shall be clearly stated at the end of the definition. "'Plain Dried Beet Pulp' shall be used on all labeling."
    e) Not include a trade name or be proprietary in nature.
3) Proposed definition.
4) Description of the ingredient (e.g., source, physical characteristics, any marketed formulation(s)).
5) Proposed labeling (can be generic).
6) Historical regulation of the ingredient, if any.

7) Description of the manufacturing processes to support identity, composition, and consistent manufacturing of the ingredient. Data to include:
    a) A description of the manufacturing process,
    b) A list and regulatory citation for all substances used in its preparation,
    c) Stability data (including packaging),
    d) Homogeneity data when ingredient is used at low inclusion rate, and
    e) Validation information of analytical methods to support testing and/or citation of official methods.
    f) Use limitations, if any.
8) Intended use of the ingredient, including target animal species, use rate, purpose, etc.
9) Data and observations (e.g., published literature, animal feeding trials, in vitro studies, empirical data showing technical effect, etc.) to support intended use.
10) Safety Assessment. The safety assessment should include a narrative specific to the target animal and, in the case of use in food producing animals, a human food safety assessment should also be provided. Intended uses specific to companion animals will only need to address target animal safety specific to the use description. The safety narrative(s) should assess all the available data. The supporting data, which serves as the basis of the safety narrative and conclusion, should include:
    a) Assessment of the ingredient for known and/or potential contaminants and impurities.
    b) Available safety information from published articles and/or unpublished studies.
        i) Target animal safety information should demonstrate the margin of safety for the intended use.
        ii) For microbial products (source of DFM, enzymes, fermentation products), information to demonstrate that they are produced from nonpathogenic and nontoxigenic strains.
11) List of cited literature.
12) Copies of all cited analytical reports, studies, and referenced articles. These may be provided in hard copy on a CD in PDF Optical Character Recognition (OCR) format.

More specific description of information listed above may be found in FDA Guidance for Industry 221 Recommendations for Preparation and Submission of Animal Food Additive Petitions.

It is imperative that the requester provide all information that is available to support their request. Confidential business information should be clearly identified in the request. Only manufacturing information can be marked confidential business information. Safety and utility data are not considered confidential business information. It may be advisable to put confidential business information in a separate document that can be sent, if needed, only to the FDA during the scientific review. Confidential business information should not be disseminated by an investigator without requester's knowledge; also see Section 14(f) of the AAFCO Model Bill or applicable governing state laws.

If not enough information is available in the published literature, a feeding trial may be needed. Please contact FDA CVM Division of Animal Feeds (DAF) for consultation on study design and requirements. Protocols should be submitted to DAF for review prior to conducting the studies.

Once a request has been submitted, the firm should wait to market the ingredient until the definition has been voted on by the AAFCO Ingredient Definition Committee (IDC), AAFCO Board, and AAFCO members.

The requester may contact the investigator to determine whether the request has been submitted to FDA for their review at the 30-day mark and every 30 days after that time.

The requester may get questions from the investigator or DAF. Questions should be addressed in a timely manner. Pending questions not addressed within 24 months will result in the investigator removing the request from AAFCO consideration.

Some ingredients are fed to intentionally alter the composition of human food (as when making human health benefit claims); these ingredients are not appropriate for review by AAFCO and need to be submitted through the Food Additive Petition (FAP) process to FDA. Additional unanswered safety questions for the ingredient may necessitate an FAP as well. FAP issues will be addressed to the **Director, Division of Animal Feeds, Center for Veterinary Medicine, Food and Drug Administration**. Check the *Official Publication* for further contact information.

A requester wanting approval pursuant to the Canadian Feeds Act and Regulations is required to file a formal application with the Canadian Food Inspection Agency. Inquiries should be addressed to **Director, Animal Feed Division, Canadian Food Inspection Agency**. Check the *Official Publication* for further contact information.

**The Investigator**

The AAFCO Investigator is a one-person committee that will evaluate and manage the request for a new definition or modified definition. One of the goals of the investigator is to develop official feed definitions that are just and equitable in cooperation with the members of the industry producing the ingredient. A second goal is to ensure that the production, sale, and use of ingredients will result in safe and effective feeds. The ingredient definitions should be non-proprietary, meaning they do not include a trade name that would favor one producer over another.

Upon receipt of the request for a new AAFCO ingredient definition or request for modification of an existing ingredient definition, the investigator will:

Determine whether the proposed ingredient definition fits in the requested section of the AAFCO OP. If not, the request will be referred to the appropriate investigator or to the chair of the Ingredient Definitions Committee with the requesting party notified of the referral.

Confirm that the proposed ingredient does not fall within the scope of an existing ingredient definition.

Confirm that a proposed revision to an existing ingredient definition will not cause it to be moved to a different section of the OP or fall within the scope of another existing ingredient definition.

Conduct an initial evaluation to determine whether any unanswered safety questions exist. If so, the requester will be referred directly to **Director, Division of Animal Feeds, Center for Veterinary Medicine, Food and Drug Administration**, to pursue a food additive approval. If FDA issues a food additive regulation for the ingredient, the investigator will lead the process of bringing the recommendation before the IDC.

Confirm that the ingredient definition request is complete and contains all the information needed from the requester listed in the requester section above.

Upon receiving a request for a new or modified AAFCO ingredient definition, the expected administrative review time for the AAFCO investigator is 30 calendar days. If the investigator expects their review to take longer than 30 days, he/she may request an extension from the chair of the Ingredient Definitions Committee or request the chair of the Ingredient Definitions Committee assign the definition to another investigator.

Once the administrative review is complete, the investigator will forward one copy (electronic copy is preferred, but if sent as PDF, use Optical Character Recognition (OCR) format) of the request to **Director, Division of Animal Feeds, Center for Veterinary Medicine, Food and Drug Administration**. If the requestor prefers to send any manufacturing information that is confidential business information directly to FDA, that is acceptable. FDA acts in a consulting role to evaluate the safety and utility of the ingredient.

Confidential business information should not be disseminated by an investigator without knowledge of the requester (also see Section 14(f), AAFCO Model Bill or applicable governing state laws).

The expected time for FDA to complete their safety and utility review is 180 calendar days. The investigator will provide an update to the requester on the status of the submission when the requests for updates are reasonably timed. After a request has been at FDA for 180 days, the investigator may contact the FDA reviewer to determine the status.

It may be necessary for additional data and information to be submitted, which may lead to multiple iterations to completely review a request. If the FDA determines that additional data and information are necessary, they will notify the requestor and copy the investigator.

When FDA has completed their review and recommended publication of the ingredient definition, the investigator will prepare and forward an "Investigators Report" form to the chair of the Ingredient Definitions Committee. These reports will be added to the agenda of the next committee meeting and are open for viewing and comments.

The investigator may initiate a modification of an ingredient definition based upon their knowledge of the affected industry and not on a specific request from an external requester. It is the responsibility of the investigator to acquire sufficient documentation to support their actions, just as it is industry's responsibility to provide sufficient documentation to support their request.

Once a new ingredient definition is approved by the Ingredient Definitions Committee, they forward a recommendation to the AAFCO Board to place the definition in the *Official Publication* in Tentative status. The Board will vote for or against this recommendation before the next membership meeting so members can vote on the recommendation during the Annual or Midyear meetings. Once approved by the membership, the Tentative ingredient definition will be published in the *Official Publication*. Status of a definition only changes upon a vote of the association membership.

The AAFCO bylaws require that each OP-published Tentative definition be reviewed by the responsible investigator 30 business days prior to the IDC meeting at the Annual meeting. The investigator shall recommend to the IDC that the definition be deleted, modified, or moved to official or remain at Tentative.

After 90 business days in Tentative status, the responsible investigator may recommend the definition be moved to Official (or any other action deemed appropriate). Any recommended change in designation will be voted on by the IDC during the Annual, Midyear, or Webinar committee meetings and forwarded to the board for recommendations and then to membership for a vote.

***When the revision includes a modification or change to the ingredient name, the old name should be removed through a sunsetting process which will provide time for the old name to expire and for transition to the new name to occur. The sunset date should be printed at the end of any ingredient that would need to be sunset in a bold parenthetical so that the section editor can easily identify any ingredient name that needs to be deleted in their annual review. The date should typically be 2 years unless the situation warrants a longer sunset period. A new ingredient number shall be assigned to the new name, and the date and action of change shall be noted in the parenthetical revision history [e.g., (proposed 1999, adopted 2000, name amended 2022)]. In the case of microorganism nomenclature changes, the new name shall be added after the old name. In definition 36.14, the new name will also need to be added on its own line if it is not currently listed. The old name will be deleted upon completion of the sunsetting period.***

**The FDA**

The Division of Animal Feeds in FDA's Center for Veterinary Medicine performs scientific reviews of AAFCO ingredient definition requests and provides recommendations to the IDC investigators for new and amended ingredient definitions.

It typically takes at least 180 calendar days to review a request for a new ingredient definition, depending on complexity of the request and FDA's current workload. The AAFCO investigator can contact the FDA reviewer after that time to inquire about the status. If FDA considers the request incomplete, FDA may contact the requester directly for that information but must copy the investigator on all communications. It may be necessary for additional data and information to be submitted, which may lead to multiple iterations to completely review a request. If needed to support their scientific review, FDA may directly request confidential business information from the requester. FDA will provide a written response to the investigator with the conclusions of their review with the recommended ingredient definition. The requester should receive a copy of this response.

**The Association**

Once reviewed by the investigator and FDA, the proposed ingredient definition is submitted by the investigator to the chair of the Ingredient Definitions Committee. The IDC is the clearinghouse for all new or modified definitions by acting as a review panel for the investigator to ensure that definitions are acceptable and consistent with AAFCO policies and existing definitions. Membership of the committee is drawn from the ranks of AAFCO members. The deadline for submission to the chair is 30 business days before the next IDC meeting and is necessary to allow ample time for committee review and corresponding with the investigator. Once a new or modified ingredient definition is approved by the Ingredient Definitions Committee, the chair will forward a recommendation to the AAFCO Board to place the definition in the *Official Publication* in Tentative status. The Board will vote for or against this recommendation before the next membership meeting so members can vote on the recommendation during the Annual or Midyear meetings. Once approved by the membership, the Tentative ingredient definition will be published in the *Official Publication*. Status of a definition only changes upon a vote of the association membership. The AAFCO bylaws require that each OP- published Tentative definition be reviewed by the responsible investigator 30 business days prior to the IDC meeting at the Annual

meeting. The investigator shall recommend to the IDC that the definition be deleted, modified, or moved to Official or remain at Tentative. After 90 business days in Tentative status, the responsible investigator may recommend the definition be moved to Official (or any other action deemed appropriate). Any recommended change in designation will be voted on by the IDC during the Annual, Midyear, or Webinar committee meetings and forwarded to the board for recommendations and then to membership for a vote. Firms may use the ingredient definition once the AAFCO membership vote has occurred affirming the recommended definition to appear in the *Official Publication*. Prior to publication in the *Official Publication*, firms wanting to manufacture feed with the ingredient may use committee minutes and general session minutes to document the completion of the process. These are typically posted on the AAFCO website. If deletion of an ingredient definition from the *Official Publication* is proposed, the investigator will follow the same dateline as if proposing any other ingredient definition change. This will allow the IDC the opportunity to review and discuss the proposed deletion.

**Canadian Food Inspection Agency**

The chair of the IDC will share all completed definition recommendations with Canadian officials for their information once the forms have been forwarded to the Ingredient Definitions Committee. A requester wanting approval pursuant to the Canadian Feeds Act and Regulations is required to file a formal application with the Canadian Food Inspection Agency. Inquiries should be addressed to **Director, Animal Feed Division, Canadian Food Inspection Agency**. Check the *Official Publication* for further contact information.

## Additional Pathways to AAFCO Published Ingredient Definitions

Section Editor—Dani Naylor, FASS

### Animal Food Additives Approved by FDA

Animal food additives approved by FDA are listed in 21 CFR 573. The food additive regulation specifies the requirements for safe use of the food additive and establishes the common or usual name for the new ingredient. To ensure that the AAFCO *Official Publication* listing of defined feed ingredients is complete, the approved food additive, as specified in the published final rule, will be incorporated in the AAFCO *Official Publication's* Official Feed Terms, Common or Usual Ingredient Names and Ingredient Definitions chapter. The designated FDA representative to the IDC will provide the appropriate investigator with the food additive regulation and will prepare a recommendation form and forward it to the chair of the Ingredient Definitions Committee for consideration at the next committee meeting.

Since the ingredient has gone through the formal FDA approval process, once the AAFCO Ingredient Definitions Committee, the AAFCO Board, and AAFCO membership have approved the definition, the entry will be incorporated in the AAFCO *Official Publication* as Official.

### GRAS Notified Substances with "No Questions" Letters from FDA

A list of GRAS Notices filed voluntarily by the notifiers pursuant to 21 CFR 570.205 that FDA has evaluated (21 CFR 570.265) and determined that it had no questions regarding the conclusion that the notified animal food substance is generally recognized as safe (GRAS) under the intended conditions of use is provided in Section 101 of Chapter 6 of the AAFCO OP. The filed notice and the FDA response letter provide information (identity, manufacture, specifications, intended effect, and safety) on the substance under the intended use conditions, and the most up to date version is posted at the following website: http://www.fda.gov/AnimalVeterinary/Products/AnimalFoodFeeds/GenerallyRecognizedasSafeGRASNotifications/ucm243845.htm. This section is provided as a convenience for the State Feed Control Officials. The Investigator of Section 101 will adapt the information as provided on the FDA website and consult with FDA on an appropriate common or usual name.

While the information on the substance and the intended use is specific to that provided by the notifier, other firms may use information within the notice along with other data specific to their substance to support the GRAS conclusion (see 21 CFR 570.3-570.280). Such other firms who conclude that an animal food substance is GRAS under the conditions of its intended use by relying on a posted GRAS notice submitted by another person shall carefully evaluate whether their production process, product specifications and intended conditions of use, fall within the parameters addressed by the referenced

GRAS notice. GRAS conclusions are not legally required to be submitted to FDA, but may be voluntarily submitted in accordance with the GRAS Notice regulation (21 CFR Part 570.205). Nevertheless, firms that elect to make use of the independent GRAS provision must document their Independent Conclusions of GRAS prior to marketing a substance for a particular intended use. State Feed Control Officials may request the Independent Conclusion of GRAS documentation to support their registration or inspection duties.

The table in Section 101 is adapted from the FDA Animal GRAS Notification website and includes ingredient definition information (substance, common or usual name (from the FDA response letter), and intended use (including use limitations, if any)). For other information, see the FDA response letter for the GRAS Notice (available at link provided above).

At each AAFCO IDC meeting, the section editor will provide an updated list of animal food GRAS Notices that have been evaluated by the FDA and have received a no questions letter from the Agency. Firms making GRAS conclusions should be prepared to answer questions from the Ingredient Definitions Committee or Association if needed. The notices are voted on by the Ingredient Definitions Committee, the AAFCO board, and accepted by the Association membership for publication in the AAFCO *Official Publication*.

**Color Additives Approved by FDA**

Color Additives intended for use in animal feed approved by FDA (specifically the Center for Food Safety and Applied Nutrition) are listed in 21 CFR 73 & 74. The color additive regulation specifies the requirements for safe use of the color additive and establishes the common or usual name for the new ingredient. To ensure that the

AAFCO *Official Publication* listing of defined feed ingredients is complete, the approved color additive, as specified in the published final rule, will be incorporated in the AAFCO *Official Publication's* Official Common or Usual Names and Definition of Feed Ingredients chapter.

The designated FDA representative to the IDC will provide the appropriate investigator with the color additive regulation and will prepare a recommendation form and forward it to the Chair of the Ingredient Definitions Committee for consideration at the next committee meeting.

Since the ingredient has gone through the formal FDA approval process, once the AAFCO Ingredient Definitions Committee, the AAFCO Board, and AAFCO Membership have approved the definition, the entry will be incorporated in the AAFCO *Official Publication* as Official.

# Attachment G:

Animal Products Work Group Report

The animal products work group is providing this report in an effort to make the Ingredient Definitions Committee and wider community aware of some the things we have been working on.

**Work group charge:**

1. Review of Animal Products descriptions, some of which are 50-60 years old, to ensure that they remain relevant to what is in the market place.
2. Discover how processes that are utilizing new technologies or agricultural practices may have changed the parameters of the existing definitions.
3. Explore the existence for new processes which have potentially created new products not appropriately described by old definitions.
4. To generally explore the potential of creating or modifying descriptions to better define animal product materials in the market place.

For a good portion of the last year, this group has met every other week on Friday afternoons.

**Work Group Members:**

Dr Charles Starke, National Renders Association
Dr. Jean Hofve, DVM
Dr. George Collings, Nutrition Services
James Emerson, National Poultry and Egg Council, Darling
James Embry, Office of the Texas State Chemist
Dr. Jennifer Vandelight, Tox Strategies
Miriam Johnson, North Carolina Feed program
Laura Scott, Canadian Food inspection agency
Loretta Hunter, PFI, Nestle

*Members that served, but have retired the last year*
*David Meeker, National Renders*
*Chris Cowell, PFI Nestle*

**Organs Definition**

____ organs are the products obtained from any combination of heart, liver, kidney, lung, spleen, or gizzard derived from slaughtered animals. If it bears a name descriptive of its kind it must correspond thereto.

**Multiple Species Animal Meat and Bone Meal**

Overview of the proposed changes to the Canadian Feed Ingredients Table - Canadian Food Inspection Agency (canada.ca)

| **(Multiple species animal meat and bone meal)** |
|---|
| **Mixed animal meat and bone meal rendered (or mixed animal meat and bone meal)** is the product obtained by rendering animal tissues, including bones, exclusive of any hair, hooves, horns, feathers, hide trimmings, scales, manure and stomach contents except in such amounts as may occur unavoidably during good manufacturing practices. It shall not contain specified risk material (SRM) as defined in Section 6.1 of *the Health of Animals Regulations* or other extraneous materials not provided in this description.<br><br>If the product bears a name descriptive of its kind or origin (for example, bovine and porcine, bovine and poultry, poultry and fish, poultry and ovine, bovine, fish and poultry), it shall correspond thereto and it may be indicated on the label. This product is obtained by rendering animal tissues from a mixture of species.<br><br>If an antioxidant is used, it must be approved for use in livestock feeds, it shall be used at the approved rate and the common name or names shall be indicated on the label.<br><br>If a preservative is used, it must be approved for use in livestock feeds, it shall be used at the approved rate and the common name or names shall be indicated on the label.<br><br>If a mould inhibitor is used, it must be approved for use in livestock feeds, it shall be used at the approved rate, and the common name or names shall be indicated on the label. |

If the product contains “prohibited material” as set forth in Section 162(1) of the *Health of Animals Regulations*, it shall be labelled with the following statement required by the Minister:

“Feeding this product to cattle, sheep, deer or other ruminants is illegal and is subject to fines or other Punishment under the *Health of Animals Act*. / Il

It shall be labelled with guarantees for minimum percent crude protein, minimum percent pepsin digestible protein, maximum percent moisture, maximum percent ash, maximum percent calcium, and minimum percent phosphorus.

**Propose to revise 9.41 Meat and Bone Meal**

*Meat and Bone Meal is the rendered product from mammal tissues, including bones, in combination with not more than 15 percent fresh raw blood exclusive of any added hair, hoof, horn, hide trimmings, manure, stomach and rumen contents, except in such amounts as may occur unavoidably in good processing practices. It shall not contain extraneous materials not provided for in this definition. It shall not contain more than 12% Pepsin indigestible residue** and not more than 9% of the crude protein in the product shall be pepsin indigestible**. The label shall include guarantees for minimum crude protein, minimum crude fat, maximum crude fiber, minimum Phosphorus (P) and maximum Calcium (Ca). If the product bears a name descriptive of its kind, composition or origin, it must correspond thereto.*

**Rationale for modifying the definition of Meat and Bone Meal**

**Dave Meeker, National Renders Association dmeeker@nara.org**
**James Emerson, USA Poultry and Egg Association JPEmerson@darlingii.com**

The current definition of Meat and Bone Meal became official in 2000. The manufacturing process, labeling, substances used in preparation of the modified description of the product remains the same as the 2000 Meat and Bone Meal Definition. None of the proposed changes will affect the original safety assessment as the substances used in the ingredient have not changed. Changes proposed are as follows:

- Remove the lower phosphorus limit to allow Meat and Bone Meal to go lower than 4%.
- Remove minimum calcium requirement.
- Remove the 2.2 phosphorus/calcium multiplier.

Rationale: Pork diets containing Phytase is the principal reason for the change. Phosphorus amounts are changing in feed rations of the animals, the raw materials are generated from, e.g., Phytase in pork rations which results in differing values from historical levels in the animals the raw material is derived from. These changes are resulting in Meat and Bone Meal in the market place that is unable to meet the requirements of the current definition.

**Recovered Food**

The United Nations Food and Agriculture Organization estimates the world wastes about 1.4 billion tons of food every year, the Environmental Protection Agency estimates the United States discards more food than any other country in the world: nearly 40 million tons — 80 billion pounds — every year. That’s estimated to be 30-40 percent of the entire US food supply, and equates to 219 pounds of waste per person. In fact, food is the single largest component taking up space inside US landfills, Dave Dressler Human Food Byproducts Investigator and Dr. Christy Smedley joined in the discussion of the discussion of Recovered food. There are companies working on this problem. Before they can convert food waste to animal food they must first have an animal food definition.

***xx.xx Recovered ____ Food** is composed of edible food materials offered for human consumption that are safe and suitable for livestock feed. Permitted recovered foods include edible plate waste, food preparation trimmings, products from overstocks, lacking consumer acceptance or beyond sell-by dates. Processing and handling must remove all undesirable constituents including but not limited to crockery, glass, metal, string, plastic, cardboard, packaging or similar materials that would be harmful to animals. The recovered food shall be collected in secure holding containers to exclude unauthorized addition of trash, materials harmful to animals, or infestation and adulteration by pests. Recovered food shall be stored, processed and collected in a manner that adequately prevents spoilage and controls food safety hazards. The guaranteed analysis shall include maximum moisture, unless the

product is dried to less than 12% moisture and designated as “Dried Recovered ___ Food”. If part of the grease and fat is removed, it must be designated as “Degreased”. The source must be declared as part of the ingredient name.
Acceptable products: Recovered Restaurant Food and Recovered Retail Food
Actions Going Forward:

- Delete 40.97 Restaurant Food Waste and 40.100 Recovered Retail Food.
- If Recovered Household Food goes through the committee, it shall be suggested as an addition to the acceptable products.

**Recommendation**
It is the recommendation of the work group that this definition be referred to Dave Dressler for further investigation as a Human Byproducts definition.
Respectfully submitted
Stan Cook, AAFCO Animal Products Investigator

# Inspection and Sampling Committee Report

2023 AAFCO Midyear Meeting
January 17, 3:30–4:30 pm, San Antonio, Texas

## Committee Action Items

(1) Sampling Study Proposal Review Work Group Charge: Review proposals received to determine which candidate is the best fit to complete the study as outlined in the Request for Proposal. The group includes the following members: Miriam Johnson (ISC Liaison) – NC; Brett Groves – IN; Mark LeBlanc – LA; Steve Stewart – MN; Josh Arbaugh – WV; Louise Calderwood – AFIA

- On **February 22, 2023** the Inspection and Sampling Committee voted to dissolve the current Sampling Study Proposal Review Work Group. The group has completed the charge. A new work group will be established to review proposals received for the Bulk Tote/Super Sack sampling study.

(2) AITS & BITS Alignment Work Group Charge: Research and gather guidance documents currently used by states and develop an inspection tool tailored to conducting PCAF inspections. This tool would be incorporated into the BITS curriculum as part of the Good Manufacturing Practices section of the course. ***NOTE** CHANGE IN CHARGE to Work Group***** The group includes the following members: Miriam Johnson (Lead) – NC; Jessica Gore – NC (POC for AITS); Chad Linton – WV; David Dressler – PA; Eric Brady – TN; Barb Schroeder – MN; Jamie Spencer – KS; Daniel Zangari – CO; Lloyd Paine – FDA; Stephanie Adams – AFIA; Chris Olinger.

a. 2022 AITS Cadre: Jessica Gore – NC (POC for AITS); Eric Brady – TN; Stevie Glaspie – MI; Jamie Spencer – KS; Jordan Mancini – MN; Miriam Johnson – NC
b. 2022 BITS Cadre: Miriam Johnson – NC (POC for BITS); Eric Brady – TN; Steve McMurry – KY; Matt Pearson – IN; Landen Kidd – UT; Chad Linton – WV

(3) AAFCO Sponsored Sampling Equipment and Tools Work Group Charge: Research current companies available that can make sampling tools to AAFCO specifications, find prices, and the logistics of being able to sell to our members, and to report back to the committee at the next meeting. The group includes: Ethan Willis – MO; Jamie Spencer – KS; Daniel Zangari – CO; Dave Dressler – PA; Jim True (KY); Al Harrison (KY); Jan Campbell (NGFA).

(4) Bulk Feed Tote/Super Sack Sampling Method Development Work Group Charge: Research current scientific sampling methods available for bulk tote bags that could be adopted as an approved AAFCO feed sampling method. Additionally, the workgroup will determine if a sampling study to validate a proposed method is needed and begin the groundwork for creating an RFP for conducting this sampling study. The group includes: Jamie Spencer – KS; Blythe Dunlap – MO and Stephanie Adams (AFIA)

(5) CIOC Webpage Updates Work Group Charge: To provide ISC webpage updates feedback to the Current Issues and Outreach Committee. The group includes: Caroline Wilkinson – VA (CIOC Liaison & Online Communication Portal Development team committee representative); Jessica Gore – NC; Daniel Zangari – CO

**Committee Participants:**

**Face to Face:** Miriam Johnson (NC) – Chair; Dan King, (MN) Board Liaison; Chad Linton (WV); Mike Davidson (CA); Jenny Combs (KY); Jacob Fleig (MO); Tim Lyons (MI); Jamie Spenser (KS); David Dressler (PA); Jessica Gore (NC); Daniel Zangari (CO); Jonathan Roberts (LA); Jim True (KY); Laura Scott (CFIA)**,** Lloyd Payne (FDA)

**Virtually:** Samantha Moran-Defty (CA); Ethan Willis (MO)

**Advisors Present:** Stephanie Adams (AFIA); Jan Campbell (NGFA), Chris Olinger (NGFA), Pat Tovey (PFI); Felicity Mejeris (PFI)

**Guest Present:** Christian Vormohr, (TX)

## Committee Report

Committee Chair, Miriam Johnson, called the meeting to order at 3:30 PM CST. 17 committee members, 5 industry liaisons, and 1 guest were present via Face to Face, Zoom meeting room, and associated phone line connections.

**Presentation:**

**TX Sampling Study – Christian Vormohr, TX**

Christian Vormohr with the OTSC presented data from a sampling project currently being conducted. He is responsible for leading the project implementation. During this presentation, he provided a brief review of work performed over the past century, explained how a variance component analysis works, and explained the OTSC project. Their proposed study is to evaluate the current ¾" trier method using a single matrix to test labeling analytes of finished feeds for poultry, cattle, horses, and dogs. After the presentation he and Dr. Tim Herrman were available to answer questions from the committee.

**Workgroup Updates:**

**Update AITS & BITS Seminars – Miriam Johnson, NC**

Miriam Johnson stated that the 2022 Basic Inspectors Training Seminar (BITS) held in Oklahoma City, OK, September 19 – 23, 2022 was a successful training with 62 total participants. She thanked Oklahoma for hosting the group for the training and helping with the logistics for the participants. She additionally stated it has been officially confirmed that the 2023 BITS seminar will be hosted by California tentative the week of September 11 – 15 in Sacramento, CA.

Furthermore, prior to the end of this Midyear meeting, Colorado will confirm whether they will host AITS for 2023 or 2024. The dates for this training have been confirmed for June 12 – 16, 2023.

**UPDATE:** from BOD/Committee Chair Midyear Closeout Meeting: Colorado will host the 2023 AITS in Golden, CO.

Miriam Johnson will work with CO, ID, TN, and CA in hosting both the AITS and BITS courses. A two-year budget plan is currently being created for the 2023 and 2024 trainings courses. A key element to creating the proposal is confirming training dates and the city in which the training will take place. Now that we have tentative dates and locations the proposals can be completed, submitted to the ETC, and then the BOD for approval. Additionally, the proposal to include CLEAR as an AITS presenter on the third day of training will be sent to the committee for approval and a recommendation provided to the BOD. Once approved by the BOD, the CLEAR contract will be included in the overall proposal submitted to ETC for AITS. This piece will need to be approved prior to completing the overall proposal due to the deadline established to secure the speaker through CLEAR.

**Bulk Feed Tote/Super Sack Sampling Method Development Workgroup – Jamie Spencer, KS**

An update to the committee on the progression of this work group was provided. An email was sent after the 2022 Annual meeting and Jamie Spencer (KS) and Blythe Dunlap (MO) volunteered and are the current members of the workgroup. Stephanie Adams (AFIA) offered to join the workgroup during the committee meeting. The group would like to start with an ingredient tote sample study and then work up to finished feed. They would like for the study to additionally explore current equipment available, for example a double tube trier may be preferred, that could be included as part of the sampling method. The workgroup recommends creating an RFP to explore current methods, like the fertilizer bulk tote method, and other existing bulk sampling methods and equipment, to determine if there are existing options that would work for feed or perhaps a combination of existing method options. These will be the asks of the RFP and will be used to gage the proposals returned for review. The committee was asked to create a motion if the workgroup recommendation was agreeable.

M**otion** to draft and finalize a Request for Proposal to explore the current methods and develop a bulk tote/super sack sampling method for feed and post the RFP to the appropriate venues for advertising: Chad Linton – WV and **seconded** by Jessica Gore – NC. **Motion passed and accepted**.

**AAFCO Sponsored Sampling Equipment and Tools Workgroup Proposal – Miriam Johnson, NC**

Miriam Johnson presented to the committee research and pictures gathered from the workgroup describing and showing the differences in the ¾" bagged probe used across the states within the group. The workgroup chose to explore this piece of equipment first because it is the most standard piece of equipment used for feed sampling. The group chose to explore one piece of equipment first to determine the viability of this project and interest from other states. Additionally, there is a completed study that was conducted to

revalidate the current ¾" trier method. With the data collected from this study there is support to standardize this particular tool. Information has also been gathered from manufacturers that can produce the tools, with costs will be based on volume manufactured. The more asked to manufacture the cheaper the price of the probe. The workgroup has created a survey for the membership to complete during this committee meeting. The information gathered from this survey will be reviewed by the workgroup to determine if states would, first of all, be interested in a uniform purchasing method and if so, what would the perfect trier look like. A link to the survey was placed on the projection screen and the audience given a few minutes to complete. Updates from this workgroup will be provided at the 2023 Annual Meeting.

**AITS & BITS Alignment Workgroup – Miriam Johnson, NC**

As outcome from discussion during the 2022 Annual Meeting in St. Louis, MO, the charge to this work group was modified. That charge now is to research and gather guidance documents currently used by states and develop an inspection tool tailored to conducting PCAF inspections. This tool would be incorporated into the BITS curriculum as part of the Good Manufacturing Practices section of the course. Miriam Johnson asked the committee and the audience to please share their guidance documents and any pictures that would be useful for teaching. A Project folder in the BIN, will be created for regulatory and industry to provide the group feedback. Once the folder has been completed an email will be sent in follow up to request documents from those who may have/use them and a deadline set to receive the documents for consideration. The group will review the documents received and tailor them to create a document supported by AAFCO that states could use to guide and train their inspection staff for completing PCAF facility inspections. The workgroup discussed the potential for two separate guidance documents, one for an Industry and one for regulators, but feedback from industry during the committee meeting revealed they would like one consistent document to be completed. They would want to use the same document that regulatory would use. Additionally, discussions from the committee indicated this may be too large to capture and create an all-encompassing document. Pat Tovey also indicated the workgroup may want to look at materials created by the Pet Food Safety Alliance for guidance and reference. An update of progression will be provided during the 2023 Annual Meeting.

**Other Topics for Discussion/New Business:**

There is interest in moving forward with developing an Aseptic Sampling Training course. Options for face to face and web based have been discussed. Miriam Johnson will confer with ETC for some initial information gathering and submitting a proposal for a training request. A request will need to be submitted to ETC before moving forward with hosting and preparing for a training.

Meeting adjourned at 4:35 PM CST.

**Action Item Table**

| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| AAFCO Branded Sampling Tools Workgroup | AAFCO Branded Sampling Tools | Find a firm(s) to produce sampling tools, confirm pricing and report back to committee | On-going/August 2023 |
| Miriam Johnson | Sampling Study Review Committee | Waiting data results from KY and TX. | On-going/ August 2023 |
| Miriam Johnson | BITS Training | Work with training cadre to prepare for training | On going/September 2023 |
| Miriam Johnson | AITS Training | Work with training cadre to prepare for training | On going/June 2023 |
| Miriam Johnson | Aseptic Sampling Training | Work with FDA & ET to decide on providing a training and work on a method; submit proposal to ETC | On-Going/August 2023 |
| AITS & BITS Alignment Work Group | cGMP checklist | Does committee train with old or new 507. Send email to committee | On-Going/August 2023 |
| Bulk Feed Tote/Super Sack Sampling Method Development Work Group | Bulk Tote Sampling Study | Research current methods available; determine if validation study is necessary | On-Going/August 2023 |

# Feed Labeling Committee Report

2023 AAFCO Midyear Meeting
January 19, 10:00–11:00 am CST, San Antonio, Texas

## Committee Recommendations:

- Modify Regulation 3(a)(4)(II) within the model regulations; revising the required guarantees for formula poultry feeds.
- Request Education & Training Committee to host a Feed Labeling Workshop during the 2024 Annual Meeting

## Board Recommendations: None

## Committee Participants

**Members Present:** David Dressler (PA), George Ferguson (NC), Justin Hill (NC), Jamie Good (ND), Bailey Whiten (GA), Erin Bubb (PA), Jordan Mancini (MN), Jamie Spencer (KS),
**Advisors Present:** Pat Tovey (PFI), James Emerson (UPA), Bill Bookout (APPA), Cathy Alinovi (NGPFMA), Steve Younker (AFIA), Meghan Dicks (AFIA), Jan Campbell (NGFA), Chris Olinger (NGFA), Dave Dzanis (ACVN).
**Absent:** Mark Ashcroft (UT), Stevie Glaspie (MI), Dragan Momcilovic (FDA), Kelli Younker (NM), Tom Phillips (MD), Lisa Fantelli (VT), Adam Orr (FDA), Ashley Shaw (FDA), Angie Simmons (GA), Julia Fidenzio (APPA), Emily Helmes (ETA), Kevin Ragland (PFI).

## Committee Report

The meeting was called to order by David Dressler at 10:00 AM CDT. Roll call of members and advisors was taken, with a quorum established (8 of 16).

**OP Edits Workgroup**

- David Dressler presented workgroup report and discussed recommendation to the committee.
  - Recommendation #1: Modify Regulation 3(a)(4)(II) within the model regulations; revising the required guarantees for formula poultry feeds.
  - Recommendation #2: Insert sample labels for horse mineral and goat feed into the feed labeling guide in the AAFCO Official Publication.
  - MOTION: George Ferguson moves to accept the workgroup report. Jamie Good Seconds.
    - Paul Mostyn: Recommend changing hay on the goat feed label to forage.
    - Richard Ten Eyck: If gluten shows up in any label, it should be aligned with the revisions accepted by membership on January 17, 2023
    - MOTION PASSES
- Recommendation 1: Modify Regulation 3(a)(4)(II) within the model regulations; revising the required guarantees for formula poultry feeds
  - George Ferguson: Since an error was already caught, is the workgroup confident to move this forward?
  - David Dressler: The changes were mentioned on the labels in the feed labeling guide. These changes haven't been worked on for over a year. The workgroup feels this section is good enough to proceed.
  - Jan Campbell: CVM was on the workgroup and has reviewed the document. Jan feels confident about the document, but not opposed to giving more time for others to review.
  - George Ferguson: Need to make sure everything is correct, because any edits would delay the process.
  - Richard Ten Eyck: Procedurally, this would go to Model Bills, so there would be time for review and edits.
  - MOTION: Erin Bubb moves send Recommendation #1 to Model bills. Jordan Mancini seconds. MOTION PASSES.

- Recommendation #2: Insert sample labels for horse mineral and goat feed into the feed labeling guide in the AAFCO Official Publication.
    - Erin Bubb: Do we know why white salt free-choice was listed in ingredient statement for the horse mineral?
    - David Dressler: This language was found in the stand-alone feed labeling guide.
    - Cathy Alinovi: Do we have to assume there is always salt in the minerals? Otherwise, you would need to offer the salt lick.
    - David Dressler: It seems this needs to go back to the workgroup for more discussion.
    - Committee agrees with having the workgroup look into this further. NO ACTION.

**Unique Identifiers (i.e. Lot Numbers) on Feed Labels**

- David Dressler presented workgroup report and discussed recommendations.
    - MOTION: Erin Bubb Moves to accept the report. Bailey Whiten seconds. MOTION PASSES.
- Jan Campbell: The workgroup did a good job of covering any possibility.
- Jamie Spencer: The definition states it needs to be on the label, but doesn't address labeling. For example, if you have a lot identifier on the bag, it is part of labeling, not the label.
- Jan Campbell: The concern is changing the language for Section 5 of the model bill, where it states that the product shall be accompanied by a label bearing a lot identifier.
- David Dressler: The definition of lot identifier states "label, container or package", thus putting it on the package would be acceptable. Regarding how Section 5 is worded, that is what is in the current model bill.
- Jordan Mancini: Putting a lot number on the seem of the bag would still fit the definition.
- Steve Yonker: The confusion seems to be with the other items listed in Section 5(a), which describe the product (i.e. Guaranteed Analysis, Ingredient Statement). A lot identifier doesn't' really fit with the other seven items in this section. There would be no issue with Section 5(b), because it has the extra caveats of invoice, delivery slip, etc.
- Paul Mostyn: It could be on the container, which is nowhere near the label.
- Bill Bookout: Was there any question about "must be accompanied" versus "shall be accompanied"? This is still too prescriptive and should be left to industry.
- Jan Campbell: Shall is what is in the current OP.
- Meghan Dicks: Would we make a recommendation to model bills to add language from Section 5(b) to Section 5(a)?
- Dave Dzanis: The definition of label already includes invoice or delivery slip.
- George Ferguson: I'm okay with putting the definition of lot identifier in the OP, but not comfortable with the other items. The last two sentences from the workgroup recommendation of the definition of lot identifier should be removed, because those are covered in Section 5. With regards to changing language in Section 5, that is already current language, and everyone has a long-time understanding about what is considered a label.
- Chris Olinger: Would like to see Section 5(a) be consistent with Section 5(b).
- Pat Tovey: We all use lot codes and don't see a reason for this. There is a concern about it being too prescriptive. Lot codes should be used to align with FSMA. Did workgroup consider what is in the federal regulations?
- Jan Campbell: There was a concern within the workgroup to ensure language is in alignment with federal requirements.
- David Dressler: Looking at the workgroup report, it doesn't get prescriptive. It doesn't state how things are supposed to be done, it just says that firms have to do it.
- Steve Yonker: There are other sections of the OP that adopt the federal regulations by reference. Since they are adopted, I don't see a reason for these.
- Erin Bubb: There are feed mills not doing this. You could reference the federal regulations, but that still doesn't mean all feed is given a unique identifier. I think we need to go through with the project.

- Meghan Dicks: The companies that attend AAFCO are already doing this. If they don't, then regulations need to work with those companies directly.
- David Dressler: Regulators have no authority to make companies do this. What is proposed will give us that authority.
- George Ferguson: There is a concern about firms picking what they want as a lot identifier. They could use state a brand name is a lot identifier; therefore, the entire brand would be considered a lot.
- Richard Ten Eyck: Oregon and Washington have had lot number requirements in their law for years. Firms have not had any issues with compliance.
- George Ferguson: Recommends this topic to be tabled until this 2023 Summer Annual Meeting to give more time for people to think about the workgroup recommendation.
- TOPIC TABLED

**Labeling of Products Containing Microorganisms**

- David Dressler presented the workgroup report.
  - MOTION: Erin Bubb moves to accept the workgroup report. Jamie Good seconds. MOTION PASSES.
- Pat Tovey: These seems to be hard to harmonize. Would state laboratories be able to do this?
- George Ferguson: Recommend sending this to Lab Services Committee to get the conversation stared. We can see what is available and go from there.
- MOTION: George Ferguson moves to follow the workgroup recommendation as provided. Jamie Good seconds.
  - Jamie Good: Feels the laboratory group could provide a lot of feedback with the possibility of this.
  - Dave Edwards: The recommendation to lab services must be edited, because probiotics are not microorganism. Also, can we numerate the actual organism?
  - MOTION PASSES

**Feed Labeling Workshop**

- There is an opening to host a feed labeling workshop during the 2024 Summer Annual Meeting. David Dressler requested the committee move to host this workshop, with the understanding that a workgroup would be formed to work out the details.
- MOTION: Erin Bubb moves to have the feed labeling workshop at the 2024 Annual Meeting. Jamie Good seconds. MOTION PASSES.

**Meeting adjourned at 11:04 CST**

**Action Item Table**

| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| David Dressler | OP Edits Workgroup | Forward Recommendation #1 to BOD and Model Bills Committee. | March 2023 |
| David Dressler | Guarantees for Microorganisms Workgroup | Forward workgroup recommendation to BOD and Lab Services Committee | March 2023 |
| David Dressler | Feed Labeling Workshop | Form workgroup to develop a feed labeling workshop at 2024 Annual Meeting | March 2023 |
| David Dressler | Feed Labeling Workshop | Notify BOD and Education & Training Committee about wanting to host a workshop at the 2024 Annual Meeting. | March 2023 |

# Laboratory Methods and Services Committee Report

2023 AAFCO Midyear Meeting
January 18, 8:00 am–2:30 pm, San Antonio, Texas
January 19, 10:00–11:00 am, San Antonio, Texas

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Actions:** None

## Committee Participants

**Members Present:** Joshua Arbaugh (WV), Sally Flowers (KS), H. Dorota Inerowicz (OISC), Mary Koestner (MO), Teresa Riegel (FL), Kristi McCallum (co-chair/CO), Sharon Webb (co-chair/UKY), Dancia Wu (OISC), Dominika Kondratko, (CO), Robin Johnson (MT), Angela Swinford (FDA), Michele Swarbrick, (MN)
**Advisors Present:** Jenny Bailie (NutriQuest/AMA), Matt Nichols (Neogen), Lars Reimann (Eurofins), Ken Riter (PFI NPAL), Leo Schilling (Eurofins), Brian Fitchett (JM Smucker)
**Virtual Attendees:** Buddhika Galkaduwa (KS), Srinu Chigurupati (FDA), Christina Chrysogelos (FDA), Lawrence Novotny (Life member), Nancy Thiex (Life member), Brenda Snodgrass (AAFCO PTP), Ametra Berry (GA), Rebecca Moseley (AL), Tai Ha (NE), William Hoek (NY), Andy Crawford (Consultant AAFCO PTP), Jeff Horst (Agri King), Melanie Titley (CFIA)

## Committee Activities

During the 2023 mid-year meeting, the LMSC heard a presentation by Nancy Thiex on Measurement Error and Sampling Methods followed by a presentation by Jennifer Combs on the results of the AAFCO Sampling Study conducted by the University of KY. Jona Verreth from the Montana Department of Agriculture gave a presentation on their laboratory's switch from the Fibertech M6 to the Ankom 200 for measuring Crude Fiber with several best practices when analyzing feed samples for Crude Fiber using the Ankom 200. APHL gave updates on APHL activities and resources for testing laboratories.
Wednesday's meeting concluded with a presentation by Dancia Wu from the Office of the Indiana State Chemist on labeling issues with direct-fed microorganisms and the difficulties with testing for these microorganisms in animal feed. The LMSC held a panel discussion with State Regulatory representatives. This was a very good discussion that focused on communication between state laboratories and their regulatory customers. On Thursday, the LMSC met briefly to discuss training and training resources for feed testing laboratories. The AAFCO strategic plan was discussed and the LMSC agreed that a training program would be of great benefit to laboratories and especially with high staff turn-over and many experienced staff retire.

ACTION: Agenda approval
MOTION: Motion to accept the meeting agenda so moved by Joshua Arbaugh and Seconded by Sharon Webb. Motion passes.
ACTION: Refer the Pilot Sampling PT scheme project to the AAFCO PTP committee
MOTION: Sharon Webb made a motion to refer this Pilot Sampling PT scheme project to the PTP committee to address the details; Seconded by Sally Flowers. Motion passes.

## Sub-Committee Activities

No update was given by the Quality Assurance sub-committee at this meeting.

ACTION: None
MOTION: None

## Committee Report

1) Welcome, Introductions, & Adoption of Agenda

2) Review of Committee Roster and Announcements
   a) Kristi McCallum reminded everyone that if you are a "member" of the FoodShield LMSC group, it doesn't necessarily mean you are a member of the committee. The FoodShield group was created to be able to post documents and send emails securely and easily.
3) Presentation: Measurement Error in Lab Prep & Sampling Methods (Nancy Thiex, Life Member)
   a) Refer to PowerPoint titled: Pilot PT for Lab Sampling posted on AAFCO website (https://www.aafco.org/wp-content/uploads/2023/03/8._2023_Midyear_LMSC_Report_FINAL_02212023.pdf)
   b) Nancy asked: How many people would be interested in participating in a routine Lab Sampling PT scheme? Fourteen labs would be interested and there was a lot of discussion on the details that need to be considered to set up the scheme. These discussions will take place in the PTP committee.
   c) Nancy asked: What else do we need to do beside participate in a Sampling PT? Suggestions included training such as Good Samples and preparation of materials to present to laboratory management on the importance of proper sampling and good sampling equipment.
4) Presentation: Results from AAFCO Sampling Study KY (Jennifer Combs, KY)
   a) Refer to the PowerPoint titled: AAFCO Sampling Study posted on AAFCO website
   b) Jennifer gave a background on the reason for the study which was to evaluate the efficacy of the current AAFCO Sampling procedures. An RFP was initiated in 2019. A summary of the sampling study results was reviewed and a brief history on the use of AAFCO's AVs was also provided. KY uses NIR to screen samples before determining if additional testing is needed. Status of Study: Raw data is complete, and they are working on getting the data to AAFCO's BOD. The board will decide what to do with the data once it's released from the Inspection and Sampling committee to them. There are some considerations with regards to getting it published before its released to the public.
5) Presentation: Making the switch from a Fibertech M6 to the Ankom 200 for measuring Crude Fiber: a not so boring tale (Jona Verreth, MT)
   a) Refer to the PowerPoint titled: Making the switch from a Fibertech M6 to the Ankom 200 for measuring Crude Fiber: a not so boring tale posted on AAFCO website (https://www.aafco.org/wp-content/uploads/2023/03/8._2023_Midyear_LMSC_Report_FINAL_02212023.pdf).
   b) Jona cautioned that laboratories need to pay attention to high fat samples and suggested using a larger beaker that allows for stirring which helps to remove the fat.
6) Presentation: APHL Update (Robyn Randolph, APHL)
   a) Refer to the PowerPoint titled: Update on APHL Activities -Supporting Human & Animal Food Laboratories posted on AAFCO website.
   b) Robyn covered recent and upcoming meetings and training opportunities. She reviewed the many resources available through APHL (e.g., quality, professional development, training courses). Robyn also gave an update on the status of the laboratory competency framework work group.
7) Presentation: Direct-Fed Microorganism for Animal Feed and Pet Food Guarantee Analysis Labeling Issues and Discussion (Dancia Wu, OISC)
   a) Refer to the PowerPoint titled: Direct-Fed Microorganism for Animal Feed and Pet Food Guarantee Analysis Labeling Issues and Discussion posted on AAFCO website (https://www.aafco.org/wp-content/uploads/2023/03/8._2023_Midyear_LMSC_Report_FINAL_02212023.pdf).
   b) No significant difference between microorganism counts between AFIA 1996 plate method vs 3M petrifilm Lab (AOAC 2017) method.

**Action Items**

| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| Co-chairs | Annual Hazards/Contaminants Survey | Revise and send survey to regulators for 2023 | October 2023/Sent to AAFCO for email distribution |

| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| LMSC QA Sub-committee | QAQC Guidelines | Revise the QAQC Guidelines to align with ISO17025:2017 | September 2022–January 2023 |
| LMSC | Training for Laboratory Staff | • Collect training resources for new AAFCO website/LMSC Training<br>• Need volunteer labs to host trainings | January 2023–January 2025 |

# Model Bills and Regulations Committee Report

2023 AAFCO Midyear Meeting
January 18, 1:30–2:30, San Antonio, Texas

## Committee Recommendations:

(1) recommend the current language in Model Bill section 3 (j) (page 108 of the 2023 AAFCO OP) be stricken and replaced with:

**The term "labeling" means all labels and other written or graphic materials in print or electronic form that are published or disseminated by a guarantor or distributor (1) upon a commercial feed or any of its containers or wrappers, or (2) accompanying or promoting such commercial feed.**

(2) recommend the current language in Model Regulation 4(d) (page 131 of the 2023 AAFCO OP) be replaced with:

**Guarantees for drugs shall be stated in terms of percent by weights, except:**

**(1) ~~Antibiotics~~ Drugs, present at less than 2,000 grams per ton (total) of commercial feed, shall be stated in grams per ton of commercial feed.**

**(2) ~~Antibiotics~~ Drugs, present at 2,000 or more grams per ton (total) of commercial feed, shall be stated in grams per pound of commercial feed.**

**~~(3) Labels for commercial feeds containing growth promotion and/or feed efficiency levels of antibiotics, which are to be fed continuously as the sole ration, are not required to make quantitative guarantees except as specifically noted in the Federal Food Additive Regulations for certain antibiotics, wherein, quantitative guarantees are required regardless of the level or purpose of the antibiotic.~~**

**(4~~(~~*new 3*~~)~~ The term "milligrams per pound" may be used for drugs ~~or antibiotics~~ in those cases where a dosage is given in "milligrams" in the feeding directions.**

## Board Recommendations: None

## Association Actions: None

## Committee Report

Model Bills and Regulations Committee Chairman Doug Lueders called the meeting to order at 2:36 p.m. central on Jan. 18, 2023.

Committee members participating in the meeting were: Dan King, Committee vice-Chair (Minnesota), Ken Bowers (Kansas), Eric Brady (Tennessee), Mike Davidson (California), David Dressler (Pennsylvania), George Ferguson (North Carolina), Kristen Green (Kentucky), Darrell Johnson (Kentucky), Ben Jones (Texas), Sherrie Krolczyk (FDA), Tim Tyson (FDA) and Scott Ziehr (Colorado).

Industry advisers participating were Meghan Dicks and Steve Younker (AFIA), Emily Helmes (ETA), Jan Campbell and Chris Olinger (NGFA), and Angele Thompson and Pat Tovey (PFI), Cathy Alinovi (NGPFMA), Bill Bookout (APPA), by phone Dave Dzanis (ACVN)

**Minutes from Previous Committee Meetings**

Chairman Lueders noted that minutes from the committee's Aug. 4, 2022 meeting were previously approved on September 9, 2022, posted on the AAFCO website, in the Feed BIN, and included within the 2023 AAFCO Midyear Meeting Committee Report Book.

**Labeling Workgroup Report**

Motion was made by Dave Dressler and seconded by Ben Jones to accept the Labeling Workgroup report. The motion passed on a voice vote.

Mr. Ziehr, Labeling workgroup chair, reported that the workgroup recommended the current language in Model Bill section 3 (j) (page 114 of the 2022 AAFCO OP) be stricken and replaced with:

**The term "labeling" means all labels and other written or graphic materials in print or electronic form that are published or disseminated by a guarantor or distributor (1) upon a commercial feed or any of its containers or wrappers, or (2) accompanying or promoting such commercial feed.**

Dan King moved to accept the work group labeling definition as presented. George Ferguson seconded the motion.
During the subsequent and lengthy discussion, committee members, industry advisors and members of the audience discussed the pros and cons of the motion.
Chairman Lueders thanked the committee, industry advisors and audience for their comments and called for a vote. The motion passed on a voice vote.
Chairman Lueders thanked the labeling work group for their years of work on this definition and disbanded the workgroup.

**Model Regulation 4(d) Workgroup Report**

A motion was made by Kristen Green to accept the Workgroup report. The motion was seconded by Dave Dressler. Chair Lueders forgot to call for a vote on the motion.
Mr. King, chair of the workgroup charged with updating 4(d) to be in sync with the Federal VFD Regulation proposed the following modifications to 4(d):
4(d) Guarantees for drugs shall be stated in terms of percent by weights, except:

(1) ~~Antibiotics~~ Drugs, present at less than 2,000 grams per ton (total) of commercial feed, shall be stated in grams per ton of commercial feed.
(2) ~~Antibiotics~~ Drugs, present at 2,000 or more grams per ton (total) of commercial feed, shall be stated in grams per pound of commercial feed.
~~(3) Labels for commercial feeds containing growth promotion and/or feed efficiency levels of antibiotics, which are to be fed continuously as the sole ration, are not required to make quantitative guarantees except as specifically noted in the Federal Food Additive Regulations for certain antibiotics, wherein, quantitative guarantees are required regardless of the level or purpose of the antibiotic.~~
(4(*new 3*)) The term "milligrams per pound" may be used for drugs **~~or antibiotics~~** in those cases where a dosage is given in "milligrams" in the feeding directions.

A motion was made by Dan King to accept the proposed 4(d) language with the additional striking of "or antibiotics" in the "new" 4(d)(3). Motion was seconded by Mike Davidson. Motion passed on a voice vote.
Chairman Lueders thanked the Regulation 4(d) workgroup for their work and disbands the workgroup.

**SUIP Biennial Workgroup Report**

A motion was made by Scott Ziehr and seconded by Ken Bowers to accept the SUIP Workgroup report. Motion passed on a voice vote.
It was noted by Chairman Lueders that the extensive Agenda attachment C was included because of its historical significance and without its inclusion chances were great that such information could be lost.
SUIP Workgroup chair, Cathy Alinovi, spoke to SUIP #1 Nitrogen Extract being present since 1963. A motion was made by Dave Dressler, seconded by Ben Jones, to forward the validity of removing SUIP #1 to the PFC and FLC for input. Upon affirmative actions by the PFC, FLC, BOD and AAFCO membership, SUIP #1 will be removed. Motion carried on a voice vote.
WG Chair Alinovi addressed SUIP #2, Trade and Proprietary Names. She indicated that this language is now in the IDC Guide to Submitting New or Modified Ingredient Definitions to AAFCO (2) A.V. If the IDC, BOD and AAFCO membership agree SUIP #2 will be removed. Motion made by Dave Dressler and seconded by Scott Ziehr. Motion carried by a voice vote.
SUIP workgroup chair Alinovi stated that SUIP #3, Improved Stability, is currently in the 2022 OP on page 353. If the PFC and FLC agree, it was recommended to be deleted. Scott Ziehr moved and Dave Dressler seconded the removal of SUIP #3 if the PFC, FLC, BOD and AAFCO membership agreed. In the ensuing discussion the several industry advisors urged the WG to review the terms "stabilized" and "stability" in reference to SUIP #3. The motion was defeated on a voice vote.
Due to time constraints, the balance of the SUIP Workgroup report was not reviewed by the MBRC.
Chairman Lueders noted that the MBRC will be reconvened at a date yet to be determined prior to the annual meeting to act on the work group's remaining recommendations and to review the expected PFLMA document expected from the PFC.

**Adjournment**

Chairman Lueders adjourned the meeting at approximately 3:39 p.m. central.
On behalf of the Model Bills and Regulations Committee, I respectfully submit this report and request acceptance of the report by the AAFCO Board of Directors and the Association membership.

# Pet Food Committee Report

2023 AAFCO Midyear Meeting
January 18, 10:00 am–12:00 pm, San Antonio, Texas

## Committee Recommendations:

(1) PFC requests the CIOC group to develop an AAFCO response to JVMA regarding the Feb 15th article on copper levels in dog foods using the letter provided by the Expert Panel chairperson.

## Board Recommendations: None

## Association Actions: None

## Committee Participants

**Members Present:** Liz Beckman (WA – Chair), Stan Cook (MO – Co-chair), William Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM), George Ferguson (NC), Justin Hill (NC), Kristen Green (KY), Holly Jewell (SC), Tiffany Leschishin (MN), JoLynn Otero (NM), Katie Simpson (IN), James Embry (TX), Barbara-Jean Schleicher (KS), Kristen Hamilton (ID), Angie Simons (GA), Bailey Whiten (GA)
**Advisors Present:** Bill Bookout (NASC), Louise Calderwood (AFIA), Dave Dzanis (APPA), James Emerson (US Poultry and Egg), Julia Fidenzio (APPA), Matt Frederking (NGFA), Pam Kaufmann (AFIA), Chris Nash (PFAC), Angele Thompson (PFI), Pat Tovey (PFI), Charles Barkley (NARA), Cathy Alinovi (NGPFMA).

## Committee Report

Meeting called to order at 10:00 AM CST

**Announcements**

PFC wishes to acknowledge and appreciate Bill Bookout, Dave Dzanis, Stan Cook and William Burkholder for their longstanding outstanding contributions to the PFC.

**Committee Minutes**

Human Grade Working Group Update – Holly Jewell, SC

The new standard for human grade pet food was approved by the AAFCO Board of Directors. USDA-AMS will audit the new standard under its USDA Process Verified Program (PVP). Manufacturers of pet food and specialty pet foods intending to use a voluntary human grade claim should adhere to the processing, packaging and labeling expectations as stated in the standard and now have the additional option to participate in the USDA AMS PVP. Firms using the PVP are then approved to market themselves as “USDA Process Verified” and include the USDA PVP shield on packaging, labeling, and promotional materials.

**Copper Workgroup – Dr. William Burkholder, FDA-CVM**

At the Annual meeting, PFC accepted the Copper Expert Panel Report. In March of 2021, AAFCO convened this expert panel to discuss the findings of the February 21, 2021 article in the Journal of the American Veterinary Medicine (JAVMA) by Dr. Sharon Center *et al.* titled ‘Is it time to reconsider current guidelines for copper content in commercial dog foods?’ The article explores the idea that Copper Associated Hepatitis (CAH) is caused by the content and supplemental sources of copper used in dog foods.

While the expert panel and AAFCO find the increase in copper content in canine liver to be well documented, insufficient data exist to establish a safe upper limit or maximum tolerance for copper in dog food. The lack of data that existed when the 2006 *Nutrient Requirements of Dogs and Cats* was published is still the case today, and AAFCO is loath to set an arbitrary level that may or may not protect against CAH.

The authors of the article requested that AAFCO consider the following actions. 1: Set the minimum requirement for CU in diets for dogs to 0.9 mg Cu/1000 kcal ME and a maximum level of 1.1 mg Cu/1000 kcal ME; and 2: Prohibit all supplemental sources of copper other than copper oxide in dog foods. The Expert Panel recommended against taking these actions. Additional information and rationale can be found in the Copper Workgroup Report.

The Expert Panel did suggest that PFC consider the possibility of setting a voluntary low copper claim standard in the Model Regulations PF10 Descriptive Terms. The Expert Panel suggested setting a level

of 15 ppm Cu (DM basis) for dog foods that meet the AAFCO Nutritional Adequacy Profiles for complete and balanced dog foods only. Dog foods that do not meet the minimum copper levels in the Profiles would not be able to make a low copper claim and would instead be required to be formulated and distributed as a therapeutic diet.
Discussion by the PFC and advisors included need to have input from nutritionists and industry to determine if the level suggested is valid and workable. There is considerable interest by consumers in having this voluntary claim information available, and there is concern that this information could be bogged down in PFC in lengthy discussions similar to the calorie content issue several years ago. There was also discussion regarding whether this type of claim would be addressing a disease condition or be a preventative type of diet.
Kristen Green moved to not pursue a restriction for allowing only copper oxide as the form of copper allowed for copper supplementation of dogs. Jo Lynn Otero seconds. Motion carries.
Kristen Green moved to not establish a maximum for the overall copper content of dog foods within the AAFCO Dog Food Nutrient Profiles. George Ferguson seconds. Motion carries.
Kristen Green moved to consider and further explore establishing within Model Regulation PF10 Descriptive Terms the criteria for commercial dog food products to bear a 'Low Copper' claim, as provided for in the language of this report. George Ferguson seconds. MOTION AND SECOND WITHDRAWN.
PFC members are directed to take time to consider the 'low copper' claim language provided by the Expert Panel for PF10 Descriptive terms prior to the annual meeting in August.
George Ferguson moved that the PFC request the CIOC group to develop an AAFCO response to JAVMA using the letter provided by the Expert Panel Chairperson. Kristen Green seconds. Motion carries.
George Ferguson moved that the PFC disband the Copper Expert Panel. Charlotte Conway seconds. Motion carries.

**PFLM Implementation Workgroup**

Nutritional Adequacy Quantitative survey – Pam Kaufmann gave a presentation on the results of the quantitative survey conducted in September to clarify intended purpose (complete/incomplete foods) on the front of packages. Survey results showed that calling out the intended purpose requirements as proposed in the draft model regulations was well understood and considered to be important by consumers.
The Draft Model Regulations for the PFLM is now completed and agreed upon by the workgroup, The work includes Guidance documents for the Facts Box. The last comment period did not yield significant revisions that would require another comment period before the PFC consideration.
The PFLM Workgroup recommends that the PFC accept the work group report which includes: draft of changes in language to the PF Model Regulations and delete and replace the current PF regulations starting on page 139 through 151 of the 2023 AAFCO OP (hardcopy); and The Facts Box Example and Key guidance document which should be placed immediately after PF12.
Charlotte Conway moved to accept the Pet Food Labeling Modernization workgroup report.
Jo Lynn seconds. Motion carries.
Next Steps:

1. Report will go to FASS first for editorial changes
2. Once report is returned to PFC, PFC will meet to discuss
3. PFC plans to conduct an e-vote in February to move the language to Model Bill for their consideration.
4. Two 50 state calls are planned (Feb 22 and March 9th) to discuss the changes based on PFLM for state programs and to get state programs on board with making the changes uniformly.
5. Groups are working to develop educational materials. There is currently a one-page flyer outlining the main changes, history and impacts of PFLM out for comment until Jan 20th, 2023.
6. The Pet and Specialty Pet Food Labeling Guide is currently with FASS for editorial changes. This work does not include PFLM, but the work to update to the current Model Bill and Regulations is nearly complete.
7. Training workshops plans are not finalized, but consideration is underway for an AAFCO Pet Food Labeling workshop January 2024 as well as Pet Food Forum 2024.

Volunteers for the Training and Outreach Workgroup are requested.
Meeting concluded at 12:00 CT.

# Proficiency Testing Program Committee Report

2023 AAFCO Midyear Meeting
January 17, 1:30–3:00 pm, San Antonio, Texas

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Actions:** None

## Committee Participants

**Members Present:** Josh Arbaugh (Board Liaison), West Virginia Department of Agriculture; Kristi McCallum, Colorado Department of Agriculture; Mary Koestner (Vice-Chair), Missouri Department of Agriculture; Sharon Webb, University of Kentucky Division of Regulatory Services; Sally Flowers (Chair), Kansas Department of Agriculture; Teresa Rygiel (Vice-Chair), Florida Department of Agriculture & Consumer Services; Gail Swinford, FDA; Michelle Swarbrick, Minnesota Department of Agriculture
**Advisors Present:** Frank Sikora, Magruder PT Program (virtual); Ken Riter, PFI; Lars Reimann, AFIA
**Virtual Attendees:** Ametra Berry, Georgia Department of Agriculture; Brenda Snodgrass (AAFCO PTP Program Manager), AAFCO, AAFCO Life Member; Nancy Thiex, AAFCO Life Member; Sue Humphries, FDA; Andy Crawford (PTP Statistician), Crawford Consulting Services; Bob Kieffer (PTP), Able Laboratories; Mo Kieffer (PTP), Able Laboratories; Tai Ha, Nebraska Department of Agriculture; Melanie Titley, Canadian Food Inspection Agency

## Committee Report

The annual ISO 17034 accreditation assessment of the AAFCO PT Program took place in November 2022 and there were no nonconformances. Once the new ISO 17043 standard is available for purchase, work will be done to update the PTP quality management system as needed. Changes to the 2023 PT Program Schemes included new prices, which became effective with open enrollment in November 2022. Also, higher shipping rates will be charged to PT participants to recover increases in shipping costs. The AV Workgroup was relaunched following the 2022 Annual Meeting and continues to be tasked with recommending to the Board a new tool for identifying products that require a stop sale. Changes to the AAFCO website include streamlining access to PT Program and Committee content and will be shared with AAFCO membership soon. There is preliminary discussion to launch a Pilot PT for Laboratory Sampling. The Committee voted to support future LMSC training events by providing past AAFCO PT samples as competency check materials for training participants.

**Committee Activities**

ACTION: Approve meeting agenda
MOTION: “Move to approve meeting minutes” by Teresa Rygiel/Second: Mary Koestner – passes
ACTION: PT Program to support Laboratory Methods and Services Committee by providing reference material samples for training participants to gauge the effectiveness of workshop training, when available.
MOTION: K. McCallum/S. Webb - passes
ACTION: Move to adjourn meeting
MOTION: J. Arbaugh/B.Snodgrass - passes

**Subcommittee Activities:** None

**Committee Minutes**

1. Call to order - S. Flowers
   The meeting agenda was reviewed and approved.
   ACTION: Approve meeting agenda
   MOTION: T. Rygiel, Second: M. Koestner
2. Program Leadership and Administrative Update
   a. Brenda Snodgrass provided an update on the PT Program’s November 2022 accreditation. Brenda, Heidi Phillips, Andy Crawford, Bob Kieffer, and Mo Kieffer participated remotely in the assessment. No nonconformances were found. The four PT schemes (Animal Feed, Pet Food, Minerals, and Mycotoxins) remain on scope with no

changes at this time. Also,the assessor unconditionally recommended that ANAB approved continued accreditation. The latest scope certificate has been posted on the AAFCO PTP website (valid until March 28, 2025). The ISO 17043 standard has been updated. Once it is available for purchase, then the PT Program quality management system can undergo updates to meet new requirements, such as risk management. We will have approximately two years to come into compliance. Also, Heidi Phillips completed an internal audit of the system prior to the accreditation assessment, again, with no nonconfomances identified.

3. Follow up to August 2022 Action Items – B. Snodgrass
    a. Program Manager, B. Snodgrass, updated the Committee on changes to Scheme subscriptions. Current enrollees and scheme orders include: Animal Feed (194 laboratories participating and 200 ordered), Pet Food Ingredients (70 laboratories participating, 79 ordered); Minerals (38 laboratories participating**,** 39 ordered); Mycotoxins (76 laboratories participating, 76 ordered). These numbers are expected to increase once all participating laboratories process their orders.
    Further, Brenda reviewed PT participation in a PowerPoint presentation. Refer to PT Program
    Updates for slides. Topics included:
        i. Laboratory participation subscription statuses for each scheme from 2019 through 2023.
        ii. Trends in Quality Reference Materials (QRM) sold per feed category from 2020 to 2022. Approximately 450 to 500 QRMs are sold annually with a total of 1,397 over the past three years.
        iii. Trends in QRMs sold by matrix from 2020 to 2023.
        iv. Comparison of Shipping and Handling costs for QRMs: Shipping costs are increasing industry-wide and PTP QRM sales also are affected. Yearly shipping costs paid by participants ($705 to $725) is much lower than what PTP actually pays ($1,571 to $2,058). Bob Kieffer suggested increasing the shipping cost by $10 per category to avoid overspending in that budget category. Increases include: from $5 to $15 for domestic, $20 to $30 for Canada, and $40 to $50 for international. These increases do not require Board approval. Sharon Webb suggested that these increases would allow the Program to recover shipping costs and suggested using Priority Mail, where feasible. About five samples could be shipping for a flat rate of $10 and then charging more for shipping if six or more samples are shipped at the same time. There was no further discussion. The final action is that Brenda makes these changes to shipping charges.
    b. Brenda updated the Committee on the QRM ordering webpage for customer use, which came up in the 2022 annual meeting. Brenda is still working on this form and it will be for Bob Kieffer's use.
4. AV Workgroup update – S. Flowers
    a. At the end of the 2022 Annual AAFCO Meeting, President George Ferguson announced a reboot for AV Workgroup, comprised up: Bailey Whitten (Georgia), Josh Arbaugh (West Virginia), Brenda Snodgrass (PT Program Manager), and Sally Flowers (Kansas; Lead). The Workgroup is still tasked with coming up with a recommendation to send to the Board. This project is a heavy lift and a solution will take time to formulate followed by a period of education for users of the new tool to discuss what AV's are and how they should be used. Concern was voiced that industry might not have the change to provide input. After there is more progress from the Workgroup, input will be welcomed from other state regulatory and laboratory members, industry members, or other subject matter experts. The workgroup recognizes that the new tool must have a lab component, an inspection component and enforcement component in order to figure whether products needs to undergo stop sale from market.
5. Update PTP content on AAFCO Website – S. Flowers and B. Snodgrass
    a. Philosophy continues to work with the Education and Outreach Committee to update the entire AAFCO website. PTP and LMSC Committee leaders saw a heat map of most frequently clicked content, which informed on the website re-design. Philosophy planned

to meet with PTP and LMSC Committee leaders once more for additional input. Many thanks to Sharon Webb and Kristi McCallum for their input! A long-awaited link to the PT Program will be added to AAFCO's main page. All members should expect to see the new launch at the end of January or soon after.

6. Customer Feedback – Br. Snodgrass
   a. There was no significant feedback to report. Brenda will be sending a survey to all current PT participants to solicit feedback.
   b. Kristi mentioned that she received a comment about the PT Program's accreditation status and she provided information in support.
7. Other Business
   a. Sally reviewed QR code survey feedback from the 2022 Annual Meeting (St. Louis) and there were no questions. To summarize, 48 people responded. The hybrid format of the committee meeting generated some audio difficulties for at least respondent.
   b. Roundtable Discussion/Open Forum
      i. Nancy Thiex will present during LMSC on a recent sampling study.
      ii. Josh mentioned, in response to the QR code survey, that a Life Member is allowed to vote in an AAFCO business meeting but not in a general session.
      iii. Kristi brought up the current AAFCO Strategic Plan. Goals for LMSC to improve training opportunities will be brought up in Thursday's morning session of the LMSC Committee. This will include the creation of an online resource with a form to request training needs and a place to share lab training information, which can be anything from laboratory methods to ISO 17025.
      iv. Kristi asked the PT Committee to consider providing past AAFCO PT samples following an AAFCO laboratory training event as a way to demonstrate technical competency. Minerals and vitamins would be good candidates while microbial targets could be evaluated using a commercially available PT. Lars Reimann commented that AAFCO samples are a good tool to assess training. Brenda added that anyone can sign up for PT schemes at any time during the year. The price is the same regardless of the time of year that sign up occurs. Any back samples from that year are shipped to the participant, which is a good value.
         ACTION: PT Program to support Laboratory Methods and Services Committee by providing reference material samples for training participants to gauge the effectiveness of workshop training, when available.
         MOTION: K. McCallum/S. Webb - passes
8. The meeting was adjourned.
   ACTION: Move to adjourn meeting
   MOTION: J. Arbaugh/B.Snodgrass - passes

**Action Items**

| Responsible | Item | Action | Timing/Status |
|---|---|---|---|
| Program Manager | Reference Materials | Provide to AAFCO laboratory training participants | Approved by Committee; provide reference materials as needed |
| Committee Chair | Sampling Pilot PT discussion | Plan and hold committee discussion(s) with Nancy Thiex on Pilot PT for Lab Sampling | Plan to hold remote meeting in March 2023 |
| QA Manager/Program Manager | ISO 17043 updates | Update Quality Management System to meet updated ISO 17043 standard | Pending availability of standard to be purchased; complete by 2025 |
| Program Manager | Quality Reference Material | Update shipping and handling prices for QRM orders | March 2023 |

# Strategic Affairs Committee Report

2022 AAFCO Midyear Meeting
January 20, 9:30–11:30 am, Mobile, Alabama

## Committee Recommendations

- **Report acceptance.**
- **Recommend:**
  - **A.** Privacy Policy (Attachment A) publication on the website and the Procedures Manual (Policies and Procedures section).
  - **B.** Publish the Resolutions Policy Guidance (Attachment B) in the *Official Publication* immediately after the Policy for Resolutions (pages 235-236)
  - **C.** Add language to the Procedures Manual, Travel Procedures, Allowances and Receipts, bullets 2 and 3 (pages 42-43) to accommodate rate changes during approved travel. Additions denoted in bold italics:
    - *"Meals and incidentals will be reimbursed based on the current U.S. federal per diem rate.* ***Where the rate changes during the approved travel period, reimbursement will be at the higher of the 2 rates. Reimbursement matching member agency rates may also be considered, provided the rates are included in the approved travel request.***
    - *Automobile travel will be reimbursed at the current U.S. federal rate.* ***Where the rate changes during the approved travel period, reimbursement will be at the higher of the 2 rates. Reimbursement matching member agency rates may also be considered, provided the rates are included in the approved travel request.*** *The claim should show origin and destination points and total mileage. If automobile instead of air travel is chosen, then the less expensive mode of transportation will be reimbursed."*

## Board Recommendations:

- **Report accepted – add date**

## Association actions:

- **Report accepted – add date**

**Full Committee Members: Linda Morrison, Kristen Green, Vice Chairperson, Dave Edwards Scott Ziehr, Erin Bubb, Doug Lueders, *Brenda Snodgrass*, Ken Bowers**, Chad Linton, **Mark LeBlanc, Kent Kitade, Ali Kashani,** Eric Nelson, ***Nancy Thiex*****,** Jennifer Godwin, **George Ferguson, Stan Cook, Ashlee-Rose Ferguson (Board Liaison)**
**Committee Advisors:** Dave Fairfield, Pat Tovey**, Leah Wilkinson**, **Bill Bookout**, Julia Fidenzio, Kristi Krafka, Bob Ehart
**Bold** = Present; ***Bold Italic*** = Virtual
**By-Laws Sub-Committee:** Ken Bowers, Erin Bubb, George Ferguson, Doug Lueders, Kristen Green

## Committee Report

1. Strategic Plan 2017-20+2
   - 2017-20: 2022 Close out

- 2023-2025: Implementation (Attachment C)

and Committee assignment tracking

- 2023-2025 SAC assignment:
  Establish charitable giving/scholarship framework. (Objective 1.3 Task 2)
  **Responsible:** Strategic Affairs Committee (SAC) and FC
  **Deliverable:** Completion of guidelines for recommendations to the Board within one year and Board implementation within two years.
  - Aligns with organizational health, not with financial management improvement. Could be scaled. One charity per year that President recommends and Board approves. Could include educational scholarships or endowment foundation. Develop thresholds and guidelines when revenue allows.
  - Should report out at midyear and annual. Could include report back from recipients at member meetings.
    **Timeframe:** Annual meeting 2024
  - SAC & FC Collaborative Work Group identified: Kristen, Ashlee-Rose, George and Austin

2. Procedures Manual
   - Draft Privacy Policy update (Erin, Jacob, Scott, FASS) (Attachment A)
     - Board charge: the Strategic Affairs Committee will review drafted language for the AAFCO Privacy Policy and consult with the Attorney to come up with a proposed policy and report back to the Board of Directors.
     - Draft developed with assistance from legal and FASS. Counsel provided suggestions to bring into compliance with GDPR
     - Work Group: Erin, Jacob (Technology Comm. rep), Scott, FASS rep
     - Place in Procedures Manual (Policies and Procedures section) and website Motion to accept Privacy Policy (Attachment A) - Erin, second - Stan. Motion carries.
3. Other Business
   - Procedures Manual update/clarification including linkage with By-Laws and Official Publication (expanded from Secretary-Treasurer description update)
     - The WG will:
       - Focus on defining what information is maintained in each of the three. Reduce overlap and duplication. Consideration should be given to minimizing OP content respecting procedures that could be placed in the PM. This would help manage the size of the OP.
       - Conduct fulsome review/update; include consideration of how the PM is managed (information storage; format; maintenance)
     - Work Group: Ashlee-Rose, Kent, Ken (By-Laws SC), Linda, Stan and Austin

- Update: Work outline started in the Bin. Business practices versus association practices need to be differentiated, perhaps with different sections in the PM. By-Laws Subcommittee did a review and made recommendations for a few other activities (Shared in Bin).
- Note that the Board also developed a charge to form a BOD workgroup (Austin, Ken and George) to review Chapter Three of the Official Publication, excluding the Association By-Laws. This workgroup should consider overlap with the procedure's manual and committee guidelines as well as the creation of internal standard operating procedures associated with routine association work. Special emphasis should also be given to consider including a new table that defines the pre and post meeting deadlines and responsibilities around creating the Business Meeting Agenda. The workgroup should provide a recommendation back to the BOD at the 2023 July BOD meeting. This Board Charge will be integrated into the SAC WG activity.
- Timing: Draft report by Annual 2023

o Resolutions Policy Guidance update (Hollis, Stan, Erin, Ashlee-Rose) (Attachment B)

- Develop guidance on drafting resolutions (WG) and implementation (CIOC/Philosophy)
- Publish after Policy in OP

Motion to accept Resolutions Policy Guidance (Attachment B) - George, second - Mark. Motion carries.

4. New business

o Travel Procedures (Procedures Manual)

- Board charge: With the potential for the mileage rate to change, moving forward we reimburse for the higher of the 2 rates whenever the implementation date of a rate change occurs during an approved travel. Implement the proposed mileage reimbursement policy for when there is a rate change until such time that the new policy is published. Additional request: that it be noted that we would allow for reimbursement matching member agency rules when applicable.

Motion to add language to accommodate rate changes during approved travel per as outlined below - George, second - Dave. Motion carries.

*Excerpt from Procedures Manual, Travel Procedures, Allowances and Receipts with edits denoted in bold italics:*

- *"Meals and incidentals will be reimbursed based on the current U.S. federal per diem rate.* ***Where the rate changes during the approved travel period, reimbursement will be at the higher of the 2 rates. Reimbursement matching member agency rates may also be considered, provided the rates are included in the approved travel request.***
- *Automobile travel will be reimbursed at the current U.S. federal rate.* ***Where the rate changes during the approved travel period, reimbursement will be at the higher of the 2 rates. Reimbursement matching member agency rates may also be considered, provided the rates are included in the approved travel request.*** *The claim should show origin and destination points and total mileage. If automobile instead of air travel is chosen, then the less expensive mode of transportation will be reimbursed."*

o Board transition date adjustment

- Board Charge: Adjust the BOD Transition Date from January 1 (as noted in Article 4, Section 1 of the AAFCO By-Laws) to Adjournment of the AAFCO BOD Meeting Immediately Following the Midyear Meeting.
- Timing: By-Laws Subcommittee will make the adjustments (including legal review) and provide a recommendation to SAC by March 1. SAC will consider and vote on the change by April 1. This will be presented an addendum to the January SAC meeting report for acceptance by the Board prior to Annual meeting. This will allow membership vote at Annual 2023 and implementation at Midyear 2024.
- Need to consider Board meetings that might not happen immediately after the Midyear (e.g. virtual meetings where Board zoom call was a week later).
- 2 year presidential term (would be 6 with PE and PP terms) discussed and not supported.

Motion to accept January 19, 2023 Midyear SAC meeting report with minor grammar edits - Ali, second - Stan. Motion carries.

**Action Item Table**

| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| WG: Ashlee- Rose, Kent, + By-Laws Sub-Committee, Linda, Stan | Procedures Manual/By-Laws/*Official Publication* update | Update/clarify Procedures Manual including linkage with By- Laws and Official Publication (expanded from Secretary-Treasurer description update) | Draft report by Annual 2023 |

| Responsible | Item | Action | Timing / Status |
|---|---|---|---|
| WG: Erin, Jacob (Technology Comm. Rep), Scott, FASS rep | Privacy Policy | Restarting with AAFCO's legal counsel who have a template and will continue working with FASS on drafting. Have added Mocaworks/Tribe to include their comments. | Complete Midyear 2023. |
| WG: Stan, Erin, Hollis, Ashlee-Rose | Resolutions Policy | Draft policy guidance. | Complete |
| Kristen, Ashlee-Rose, George and Austin (FC & SAC collab) | SP: Objective 1.3 Task 2 | Establish charitable giving/scholarship framework. | Annual 2024 |
| By-Laws Subcommittee | BoD Transition Date | Adjust the By-Laws | Membership vote Annual 2023; implementation January 2024 |

# Attachment A: Privacy Policy

**Introduction**

The Association of American Feed Control Officials ("AAFCO," "we," "our," or "us") respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the information you provide to us in using our website ("Site") and the services provided through our Site (the "Services").

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. Please review this Privacy Policy periodically.

This Privacy Policy covers the following topics:



## 1. Collecting and Using Information

### Personally Identifiable Information We Collect Online

We collect Personally Identifiable Information from you through your use of the Site and Services. "Personally Identifiable Information" is individually identifiable information about an individual consumer that we collect online and that we maintain in an accessible form. We collect the following types of Personally Identifiable Information:

*Information You Provide*

We may collect the following Personally Identifiable Information that you voluntarily provide to us:

- *Create an Account*. To create an account, you will provide us with your name, job title, company name, physical address, phone number, email address, and you will create a username and password for future logins.
- *Purchase*. To make a purchase you will provide your name, physical address, phone number, email address, and credit card information. We use FASS Inc. to process payments. Please review FASS's privacy policy here.
- *Register for a Meeting or Event*. To register for a meeting or event, you will provide us with your name, physical address, and email address.
- *Contact Us*. To contact us or ask us a question, you will provide us with your name, email address, company name and title, and any other information you may choose to provide in your question.

*Information as You Navigate Our Site*

We automatically collect certain Personally Identifiable Information through your use of the Site and Services, such as the following:

- *Usage Information*. For example, your IP address, pages on the Site you access, the frequency of access, and what you click on while on the Site.
- *Device Information.* For example, hardware model, operating system, application version number, and browser.
- *Mobile Device Information*. Aggregated information about whether the Site is accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information*. Location information from Site visitors on a city-regional basis.

*Third Party Information*

In some cases, we may receive certain Personally Identifiable Information from you about a third party. For example, to register for an event or meeting, you may provide the name, physical address, and email address of a third party. If you submit any Personally Identifiable Information about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personally Identifiable Information in accordance with this Privacy Policy.

### How We Use Your Personally Identifiable Information

We use the Personally Identifiable Information we collect to provide the Services to you, to improve our Services and Site, and to protect our legal rights. In addition, we may use the Personally Identifiable Information we collect to:

- Process your account registration;
- Process and fulfill your order;
- Register you for a meeting or event;
- Contact you regarding our products, services, and events that we feel may be of interest to you;
- Communicate with you about our Site or Services or to inform you of any changes to our Site or Services;
- Provide support;
- Maintain and improve our Site and Services;
- Defend our legal rights and the rights of others;
- Efficiently maintain our business; and
- Comply with applicable law.

**How We Share Your Personally Identifiable Information**

We may share the information that we collect about you in the following ways:

- With our association management organization;
- With service providers who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, membership management, etc.);
- To service providers to prepare, deploy and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personally Identifiable Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personally Identifiable Information;
- To any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition or in preparation for any of these events; and
- To any other person or entity where you consent to the disclosure.

**2. Cookies and Other Tracking Technologies**

**How We Use Cookies**

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons) (collectively, "Cookies"). "Cookies" are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to:

- Estimate audience size and usage patterns;
- Understand and save your preferences for future visits, allowing us to customize the Site and Services to your individual needs;
- Keep track of search engine results;
- Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and
- Recognize when you return to the Site.

We set some Cookies ourselves and others are set by other entities. We use Cookies set by other entities to provide us with useful information to help us improve our Site and Services, to conduct advertising, and to analyze the effectiveness of advertising. For example, we use Cookies from Google, Microsoft and other similar companies.

**How You Can Opt-Out of Cookies**

When you first visit our Site, you will be presented with a banner which offers you choices about whether to accept or reject cookies or tracking technologies of different types. If you wish to change your preferences, you can do so by clicking here.

*Browser Settings*

Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Site. You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org or www.allaboutcookies.org.

*Platform Controls*

You can opt out of Cookies set by specific entities by following the instructions found at these links:

- Google: https://adssettings.google.com
- Microsoft: https://account.microsoft.com/privacy/ad-settings/

*Advertising Industry Resources*

You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the Network Advertising Initiative's website or the Digital

Advertising Alliance's website. For more information on mobile specific opt-out choices, visit the Network Advertising Initiative's Mobile Choices website.
Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

**Google Analytics**

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies or other tracking technologies to help us analyze how users interact with the Site and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The technologies used by Google Analytics do not gather information that personally identifies you. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's privacy policies. To learn more about Google's partner services and to learn how to opt-out of tracking of analytics by Google, click here.

**Google reCAPTCHA**

We use Google reCAPTCHA, a free service provided by Google, Inc., to protect our Site from spam and abuse. Google reCAPTCHA uses advanced risk analysis techniques to decipher humans and bots. Google reCAPTCHA works differently depending on what version is deployed. For example, you may be asked to check a box indicating that you are not a robot or Google reCAPTCHA may detect abusive traffic without user interaction. Google reCAPTCHA works by transmitting certain types of information to Google, such as the referrer URL, IP address, visitor behavior, operating system information, browser and length of the visit, cookies, and mouse movements. Your use of Google reCAPTCHA is subject to Google's Privacy Policy and Terms of Use. More information as to Google reCAPTCHA and how it works is available here.

3. **Third Party Processors**

   To ensure that your Personally Identifiable Information receives an adequate level of protection, we have put in place appropriate procedures with the service providers we share it with to ensure that it is treated consistent with applicable data security and privacy laws. For example, we use cloud data storage, shipping fulfilment, payment processors, and membership management providers.

4. **"Do Not Track" Signals**

   Some internet browsers incorporate a "Do Not Track" feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the "Do Not Track" signal, the Site does not currently interpret, respond to or alter its practices when it receives "Do Not Track" signals.

5. **Choices About Your Personally Identifiable Information**

   **Review and Request Changes to Your Personally Identifiable Information**

   You may use your account to access, correct, or view certain Personally Identifiable Information that is associated with your account. To review or request changes to any of your Personally Identifiable Information, please contact us at aafco@aafco.org.

   Marketing Communications

   To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails. You also may submit a request to us at aafco@aafco.org.

6. **Security**

   We maintain commercially reasonable security measures to protect the Personally Identifiable Information we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personally Identifiable Information, we cannot guarantee absolute security.

7. **Third Party Links**

   The Site and Services may contain links that will let you leave the Site [and Services] and access another website. Linked websites are not under our control. This Privacy Policy applies solely to Personally Identifiable Information that is acquired by us on this Site and Services. We accept no responsibility or liability for these other websites.

8. **Children's Privacy**

   The Site and Services are not intended for children under 13 years of age. We do not knowingly collect, use, or disclose personal information from children under 13.

9. **Notice to Nevada Residents**

   Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines "sale" to mean the exchange of certain types of personal information for monetary consideration to another person. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to aafco@aafco.org.

10. **Notice to California Residents**
    We do not disclose personal information obtained through our Site or Services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.
11. **How to Contact Us**
    To contact us for questions or concerns about our privacy policies or practices please contact us:
    AAFCO
    Attn: Privacy Policy Request
    1800 S Oak St, Ste 100
    Champaign, IL 61820
    aafco@aafco.org
    217-356-4221

Note: Hyperlinks will be available on website.

# Attachment B: Resolutions Policy Guidance

## AAFCO Resolution Guidance (DRAFT)

## Supplemental to Policy on Resolutions, adopted (08/04/2022)

**Resolution Summary**

In accordance with the process outlined in this guidance, each year prior to the AAFCO Association Business Meeting, resolutions may be submitted to the AAFCO Board of Directors by members or committees for consideration. Through this process, members and committees may raise concerns and suggest action relating to legislative, regulatory, and technical issues as they apply to commercial animal feed and food safety issues.

All resolutions reviewed and approved by the Board of Directors are presented to the membership during the Annual Meeting for consideration and vote for adoption. After the Annual Meeting, actions are taken to carry out those resolutions adopted by the membership; these actions may include referral to a federal agency for consideration, letters to Congress, or to other organizations impacted by the resolution.

The following is detailed guidance in the submission, review, and adoption of a resolution, according to Policy on Resolutions, adopted on 08/04/2022.

**Definitions and Roles**

- **Policy on Resolution:** Policy on Resolutions adopted (08/04/2022)
- **Board of Directors ("Board"):** Reviews proposed resolutions and makes recommendations to the membership. Initiates, or delegates to the Executive Director or Committee Chairs, action required or appropriate for the membership-approved resolutions. May invite the Resolution Sponsor to provide context or answer questions to the Board meeting where proposed resolutions are presented.
- **Executive Director:** Receives and assembles resolution submissions and works with Resolution Sponsor on refining the draft. Presents proposed resolutions to the Board and coordinates Board consideration. May present the MRE Resolutions during the Annual Meeting. Complete and/or ensure actions are complete for implementation of membership-approved resolutions. Coordinate the posting of resolutions and approved responses on AAFCO's website.
- **Memorial, Recognition and Good Etiquette Resolutions:** ("MRE Resolutions"): Resolutions that represent good etiquette and recognition of an achievement, event, or person that falls outside of criteria for existing awards and typically do not include a request for action by an outside party. These are presented during the Annual Meeting by the Executive Director.
- **President:** Calls for resolutions at the Midyear Association Business Meeting. Coordinates the inclusion of Board-approved resolutions into the meeting materials for the Annual Association Business Meeting or delegates to the President-Elect.
- **President-Elect:** Presents Board-approved resolutions to the membership for consideration during the Annual Association Business Meeting. If delegated by the President, coordinates the inclusion of Board-approved resolutions into the meeting materials for the Annual Association Business Meeting.
- **Resolution Sponsor**: Designated AAFCO member or Committee responsible for drafting and submitting the resolution.

**Submission Process**

- Call for resolutions will be made by the President in January at the Midyear Association Business Meeting by the following Policy on Resolutions. Resolutions are due at a deadline determined by the President and communicated in the Midyear call for resolutions.
- Step 1: Fill out the Resolutions template
- Step 2: Send your resolution to the President and Executive Director.
- The Executive Director will assign the resolution a number, including the year of submission and a sequential number for each submission in that given year, YYYY-#, e.g. 2016-3.
- Resolutions will be submitted by the Executive Director to the Board no later than 60 days before the Annual Meeting for review and recommendation for membership.
- ***Guidance on Drafting a Good Resolution***
  - A Resolution Sponsor should have a good knowledge of the topic and have a solution in mind to whatever the problem may be that has driven them to believe a resolution will be effective or at least stimulate action on a topic.
  - Overall and each idea or concept within the resolution should be brief and to the point, beginning with "Whereas" and each ending with a comma and the word "and." For example:
    - "**Whereas,** there is a problem with the sequencing of ingredients for BSE, and
  - The last "Whereas," section should end with "…therefore be it." For example:
    - "**Whereas,** this problem could cause a significant amount of animal deaths and there seems to be a lack of understanding due to its prevalence as an inspection violation/observation, **therefore be it**"
  - The last section should begin with "Resolved, that…." Suggested actions should be clear and brief. For example:

        - "**Resolved,** that more clear language be developed in the model regulations to prevent deaths from occurring as well as a directed outreach campaign to increase awareness."
    - In addition to your resolution, submit a one-page summary not to exceed one page explaining the purpose and background.
- ***Submission Guidance:***
    - A resolution must have a Resolution Sponsor.
    - Contact the Executive Director for any assistance.
    - Start resolution development early and submit to the Executive Director well before the deadline set by the President's call for resolutions.

**Review Process**

- The Executive Director will review the resolution for clarity and form and may modify the language as long as the intent is not changed. Similar resolutions may be consolidated.
- Resolutions will be submitted by the Executive Director to the Board no later than 60 days before the Annual Meeting for review and recommendation for membership.
- The Board should review and consider resolutions prior to the deadline for the final Annual Association Meeting Agenda.
- ***Guidance:***
    - The Resolution Sponsor may attend the Board meeting to discuss the resolution. Be prepared to answer questions.

**Adoption Process**

- The President-Elect are responsible for including the Board-approved resolutions in the meeting material for the Annual Association Business Meeting.
- The President-Elect will present the resolutions to members during the Annual Association Business Meeting. Members will vote on each resolution presented, with adoption determined by a two-thirds vote. Adoptions will follow all procedures and by-laws governing the business meetings.
- The adoption process shall follow additional procedures in Policy on Resolutions, including the Board's responsibility to initiate all action required by the approved resolution within the year. The Board may delegate action to the Executive Director or Committee Chairs for implementation.
- Approved resolutions will be added to the website 30 days after the Annual Meeting. Resolution progress or responses may be posted to the website.

# Attachment C: Strategic Plan 2023–2025

In early 2022, the Board of Directors (Board) and Committee Chairs as well as Food and Drug Administration (FDA) and Past President representatives met virtually to establish Goals and Objectives. Tasks were identified at Seminar (May 16) (hybrid virtual and in person) and finalized virtually in October. The Board decided to ***Table Objectives 1.1 and 4.1*** from Task identification at Seminar. The work will be done in future, led by a Board group.

For 6 Objectives, each group was asked to:

1. Identify and prioritize Tasks for each Objective. Identify intended outcomes for each Task and prioritize the Task list.
2. For each Task identify responsible committees, timelines and activities to achieve the Task outcome. Consider resources and $ implications.
3. Each Task needs to have a tangible outcome that will translate into what will be accomplished.
4. Tasks will be identified based on the premise that they will be completed within the Strategic Plan timeframe (3 years starting January 2023; full years 2023-2025). If not the timeframe will be specified (e.g. 5 years).

Smart Tasks principles were used:

- *Specific* – target a specific area for improvement.
- *Measurable* – quantify or at least suggest an indicator of progress.
- *Assignable* – specify who will do it.
- *Realistic* – state what results can realistically be achieved, given available resources.
- *Time-related* – specify when the result(s) can be achieved.

**Finalized Goals and Objectives**

**Vision** - AAFCO is a trusted leader that safeguards animal and human health.

**Mission** - AAFCO is a collaborative association that supports members and stakeholders, and promotes a safe feed supply through unified system-based regulation, feed ingredient standards and laboratory operations.

**GOAL 1: Improve Organizational Infrastructure and Operations**

(Improve the organization's infrastructure and operations to be more effective and efficient and dynamic.)

- Objective 1.1: Evaluate current AAFCO internal protocols and processes to enhance operational efficiencies (tabled to address in future)
- Objective 1.2: Identify and develop organizational training for AAFCO leaders
- Objective 1.3: Identify and pursue opportunities that improve financial management and advance organizational health

**GOAL 2: Enhance Member Support and Education Resources**

(Members are supported through the development of tools, resources, education, and other efforts.)

- Objective 2.1: Be the leading resource of training for animal food regulators and laboratories within 5 years
- Objective 2.2: Enhance membership through recruitment, support and sustainability

**GOAL 3: Advance Human and Animal Health and Safety**

(Regulatory and laboratory initiatives promote the health and safety of humans and animals.)

- Objective 3.1: Promote and integrate Animal Food Safety Systems
- Objective 3.2: Promote and integrate laboratory technology, methods, quality systems, and collaboration in support of Animal Food Safety Systems

**GOAL 4: Foster External Stakeholder Relationships**

(Relationships with external stakeholders are fostered to provide advancement opportunities for the Association.)

- Objective 4.1: Identify stakeholders with common interests in order to prioritize, develop, and maintain professional relationships that advance AAFCO's Vision and Mission (tabled to address in future)

# Strategic Affairs Committee: Addendum 1 Report

Final March 30, 2023

## Committee Recommendations

- **Report acceptance.**
- **Recommend:**
  Revise the **By-Laws Article IV change Section 1** to include the portion in **bold**:
  Section 1. Officers. The President, President-Elect, and Secretary-Treasurer shall be elected by the membership at each annual meeting by a majority of those present and voting, and shall serve for the year beginning **upon adjournment of the Midyear AAFCO Business Meeting and conclude upon adjournment of the following Midyear AAFCO Business Meeting.**

## Board Recommendations

- **Report accepted – add date**

## Association Actions

- **Report accepted – add date**

**Full Committee Members:** Linda Morrison; Kristen Green, Vice Chairperson; Dave Edwards; Scott Ziehr; Erin Bubb; Doug Lueders; Brenda Snodgrass; Ken Bowers; Chad Linton; Mark LeBlanc; Kent Kitade; Ali Kashani; Eric Nelson, Nancy Thiex; Jennifer Godwin; George Ferguson; Stan Cook; Ashlee-Rose Ferguson (Board Liaison)
**Committee Advisors:** Dave Fairfield; Pat Tovey; Leah Wilkinson; Bill Bookout; Julia Fidenzio; Kristi Krafka; Bob Ehart
**By-Laws Sub-Committee:** Ken Bowers; Erin Bubb; George Ferguson; Doug Lueders; Kristen Green

## Committee Addendum Report:

1. By-Laws Sub-Committee Report: Board transition date adjustment
   Present: Ken Bowers, Kristen Green, George Ferguson, Erin Bubb
   Charge:
   - Board transition date adjustment
     - Board Charge: Adjust the BOD Transition Date from January 1 (as noted in Article 4, Section 1 of the AAFCO By-Laws) to Adjournment of AAFCO BOD Meeting Immediately Following the Midyear Meeting
     - Timing: By-Laws Subcommittee will make the adjustments (including legal review) and provide a recommendation to SAC **by March 1**. SAC will consider and vote on the change by April 1. This will be presented an addendum to the January SAC meeting report for acceptance by the Board prior to Annual meeting. This will allow membership vote at Annual 2023 and implementation at Midyear 2024.
     - Need to consider Board meetings that might not happen immediately after the Midyear (e.g., virtual meetings where Board zoom call was a week later).

ARTICLE IV

**Officers**

**Section 1. Officers.** The President, President-Elect, and Secretary-Treasurer shall be elected by the membership at each annual meeting by a majority of those present and voting, and shall serve for the year beginning January 1 of the next calendar year, and ending December 31.

Change to:
Section 1. Officers. The President, President-Elect, and Secretary-Treasurer shall be elected by the membership at each annual meeting by a majority of those present and voting, and shall serve for the year beginning **upon adjournment of the Midyear AAFCO Business Meeting and conclude upon adjournment of the following Midyear AAFCO Business Meeting.**
2/23/23 By-Laws Subcommittee Meeting notes:

- The subcommittee felt that the transfer of Presidency immediately following the Midyear business meeting would be a more smooth transition than after the BoD meeting immediately following the Midyear meeting, there is little for the new President to do the rest of the week. They should have no real issue running the BoD meeting at the end of the week, since they've typically been involved in BoD meetings for several years prior to running one.
- Transition at adjournment of the Midyear Business Meeting (Ceremonial transition)
- New President will be responsible for addressing the Midyear meeting for the rest of the week and running the BOD meeting after the Midyear concludes.

E-vote March 26-28, 2023: Motion to accept By-Laws Sub-Committee Report - Ali, second - Brenda. Motion carries.
E-vote March 28-30, 2023: Motion to accept SAC Addendum Report - Kristen, second - Ali. Motion carries.

# Strategic Affairs Committee: Addendum 2 Report

Draft April 11, 2023

## Committee Recommendations

- **Report acceptance.**
- **Recommend:**
  - **A. Edit both the Procedures Manual and OP respecting posting of Board Meeting Records. Edit the last row on Table 2 – BOD Post-Meeting Deadlines and Responsibilities in the 2022 AAFCO Procedures Manual on P.16 to read:**
    "Post approved minutes to the members only section of the AAFCO Website"
    **Change language in Table 4 BOD Post-Meeting Deadlines and Responsibilities on P. 94 of the 2023 AAFCO Official Publication to read:**
    "Post approved minutes to the members only section of the AAFCO Website" *"From: DRAMF" "To: Members"*

## Board recommendations

- **Report accepted – add date**

## Association Actions

- **Report accepted – add date**

**Full Committee Members:** Linda Morrison; Kristen Green, Vice Chairperson; Dave Edwards; Scott Ziehr; Erin Bubb; Doug Lueders; Brenda Snodgrass; Ken Bowers; Chad Linton; Mark LeBlanc; Kent Kitade; Ali Kashani ; Eric Nelson; Nancy Thiex; Jennifer Godwin; George Ferguson; Stan Cook; Ashlee-Rose Ferguson (Board Liaison)
**Committee Advisors:** Dave Fairfield; Pat Tovey; Leah Wilkinson; Bill Bookout; Julia Fidenzio; Kristi Krafka; Bob Ehart
**By-Laws Sub-Committee:** Ken Bowers; Erin Bubb; George Ferguson; Doug Lueders; Kristen Green

## Committee Addendum Report

1. Board Minute posting: Workgroup Report

   **Workgroup Members:** Austin Therrell, Leah Wilkinson, Stan Cook, Dave Edwards, Ken Bowers
   **Workgroup Member Emails:** LWilkinson@afia.org; stan.cook@mda.mo.gov; david.edwards@fda.hhs.gov; Ken.Bowers@ks.gov; austintherrell@aafco.org
   Charge:
   The AAFCO BOD moves to charge the Strategic Affairs Committee to review the necessity of publishing the BOD minutes on the AAFCO website, while taking into consideration the updated AAFCO Privacy Policy, liability concerns of BOD members, and the language in the Official Publication that directs the placement of the BOD minutes. The Workgroup should direct requests for assistance from legal counsel to the executive committee.
   **Background:**
   BOD minutes were taken down in July of 2021
   Why? – concerns with documents being used outside of their intended purpose

   **Call #1 – (2/2/22)**
   - Bylaws – post to membership - ok
   - Committee guidelines – post to AAFCO website – conflicting with procedures manual
   - Procedure's manual – post to Feed Bin - ok
   - Remove names from minutes? – need more training
   - Build the business meeting agenda throughout the year and post to next meeting page

   **Recommendation to SAC (2/2/22):**
   ~~The workgroup recommends to the Strategic Affairs Committee to edit the row ***"Post Approved Minutes"*** in **Table 4 BOD Postmeeting Deadlines and Responsibilities** on P. 100 of the 2022 AAFCO Official Publication to read ***"Post approved minutes in FEED BIN" "From: DRAMF" "To: Members"*** in order to match the language in **Table 2 – BOD Post-Meeting Deadlines and Responsibilities** in the 2021 AAFCO Procedures Manual on P. 15. The workgroup also requests that the Designated Representative of the Association Management Firm (DRAMF) begin capturing the business meeting~~

~~items after each BOD meeting to build the business meeting agenda throughout the year and post the updated document in the appropriate upcoming meeting section (Midyear or Annual) on the AAFCO website. This document would be updated with recommendations for the membership after each BOD meeting if appropriate. The workgroup also recommends providing training on best practices for capturing minutes for meetings for all that are taking minutes.~~

**Instruction change April 2023:** In February 2022 there was a discussion that this workgroup had around the placement of the AAFCO BOD meeting minutes. We made a recommendation back to SAC to update Table 4 in the Committee Guidelines section, and that recommendation was ultimately passed on to the BOD and then to membership where it was voted on at the 2023 Midyear January meeting in San Antonio.

There are a couple issues that have come up during implementation that we didn't foresee with our crystal ball early in 2022. They are listed below:

- A workgroup within the Technology Committee is beginning to draft an RFP that will possibly replace the Feed BIN this year.
- There isn't a backend process within the feed BIN that will only make these minutes available to AAFCO Members only. (Firewall issues)
- Creating a backend process within the Feed BIN is possible, but has a price tag and time commitment for development, and it's unwise to spend the resources since we may be transitioning to a new collaboration platform shortly.

Proposed solution:

FASS IT is able to create a page on the new website behind a login, so the BOD minutes are password protected and only available to AAFCO members. This achieves the same goal as putting them in the Feed BIN for the time being and alleviates the concern that they could be used outside of their intended purpose. If you've ever accessed the recordings from a previous Annual or Midyear meeting it would be the same process.

**Recommendation to SAC: (REVISED 4/6/23)**

The workgroup recommends to the Strategic Affairs Committee to edit the last row on **Table 2 – BOD Post-Meeting Deadlines and Responsibilities** in the 2022 AAFCO Procedures Manual on P.16 to read "Post approved minutes to the members only section of the AAFCO Website" and change language in **Table 4 BOD Post-Meeting Deadlines and Responsibilities** on P. 94 of the 2023 AAFCO Official Publication to read "Post approved minutes to the members only section of the AAFCO Website" *"From: DRAMF" "To: Members"*.

The workgroup also requests that the Designated Representative of the Association Management Firm (DRAMF) begin capturing the business meeting items after each BOD meeting to build the business meeting agenda throughout the year and post the updated document in the appropriate upcoming meeting section (Midyear or Annual) on the AAFCO website. This document would be updated with recommendations for the membership after each BOD meeting if appropriate. The workgroup also recommends providing training on best practices for capturing minutes for meetings for all that are taking minutes. By-Laws Sub-Committee Report: Board transition date adjustment.

E-vote April 11- , 2023: Motion to accept Board Minute Workgroup Report - ??, second - ??. Motion carries.
E-vote April ??-??, 2023: Motion to accept SAC Addendum 2 Report - ??, second - ??. Motion carries.