



2023 ANNUAL MEETING **AGENDA BOOK**

JULY 31–AUGUST 2, 2023

RENAISSANCE BALTIMORE HARBORPLACE HOTEL
BALTIMORE, MARYLAND

Sunday, July 30

8:00–11:00 AM Maryland A & B
Board of Directors and Committee Chair Meeting

12:00–7:00 PM Maryland Foyer
Registration Open

1:00–4:30 PM Maryland A & B
PFC Train the Trainer – Pet Food Labeling Modernization Workshop

6:00–8:00 PM Watertable Ballroom
AAFCO 101 – First-Time Attendee Meet and Greet

Light hors d'oeuvres served

Monday, July 31

7:00 AM Maryland Foyer
Registration Open

8:30 AM Maryland D & C
Welcome
Eric Brady, AAFCO President, and Secretary Kevin Atticks, Maryland Department of Agriculture

9:00–10:15 AM Maryland D & C
Business Meeting

10:15–10:30 AM Maryland Foyer
Coffee Break

10:30–11:00 AM Maryland D & C
Tracey Forfa, CVM Director

11:00–11:45 AM Maryland D & C
Laboratory and Panel Regulator Discussion

11:45–1:15 PM
Lunch – On Your Own

11:45–1:15 PM Baltimore B
AAFCO Investigators Lunch (closed session)

1:15–1:45 PM Maryland D & C
Current Issues and Outreach Committee

1:45–2:15 PM

Coffee and Networking Session

Maryland Foyer

2:15–5:15 PM

Proficiency Testing Program Committee

Baltimore B

2:15–3:45 PM

Ingredient Definition Committee (Part 1)

Maryland D & C

3:45–4:45 PM

Inspection and Sampling

Maryland D & C

4:45–5:15 PM

Technology Committee

Maryland D & C

5:15 PM

Adjourn – General Session

Tuesday, August 1

7:00 AM

Registration Open

Maryland Foyer

8:00–10:30 AM

Laboratory Methods and Services Committee

Baltimore B

8:00–9:00 AM

Feed Labeling

Maryland D & C

9:00–10:00 AM

Ingredient Definition Committee (Part 2)

Maryland D & C

10:00–10:30 AM

Ingredient Definition Committee Speaker

Maryland D & C

Azita Sayadi, Mill: Dried Recovered Household Food

10:30–10:45 AM

Coffee Break

Maryland Foyer

10:45–11:45 AM

Laboratory Methods and Services Committee

Baltimore B

10:45–11:45 AM

Model Bills and Regulations Committee

Maryland D & C

11:45–1:15 PM

Lunch – On Your Own

Baltimore B

11:45–1:15 PM

Finance Committee (closed session)

Baltimore B

1:15–3:15 PM

Pet Food Committee

Maryland D & C

1:15–3:15 PM

Laboratory Methods and Services Committee

Baltimore B

3:15–3:45 PM

Coffee Break

Maryland Foyer

3:45–5:15 PM

Enforcement Issues Committee (state regulator and FDA only)

Maryland D & C

6:00–8:00 PM

Tuesday Night Networking Reception – “Connect 4 Success”

Maryland Foyer

Wednesday, August 2

8:00–8:45 AM

Feed and Feed Ingredient Manufacturing

Maryland D & C

8:45–9:45 AM

Education and Training

Maryland D & C

9:45–10:45 AM

Strategic Affairs Committee

Maryland D & C

10:45–11:00 AM

Coffee Break

Maryland Foyer

11:00–12:00 PM

SAFHER Session - All Invited

Maryland D & C

12:00–1:30 PM

Board of Directors and Committee Chair Lunch Meeting

Baltimore B

Connect, Participate, and Share Feedback

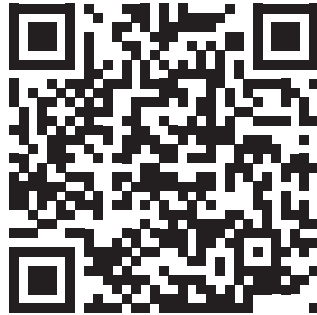
View the Attendee List:



Participate in the Discussion with Slido:

Slido.com

Code to Join: #4058394



Upon conclusion of the meeting, please take a survey and let us know what you thought!





AAFCO
Association of American Feed Control Officials

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Please note AAFCO does not generally record discussions during meetings unless formally announced at the start of the meeting. Having said that, there may be individuals recording presentations/discussions taking place. AAFCO does not have control over individuals who choose to do so. Furthermore, it may be a violation of state and/or other jurisdictions to make these types of recordings without knowledge of participating individuals who are being recorded.

2023 AAFCO Board of Directors



Eric Brady, President

Eric Brady is the Statewide Supervisor for Ag Inputs Section for the Tennessee Department of Agriculture. Over the last four years, Eric has overseen daily field operations for the Feed, Seed, Fertilizer, and Lime programs and managed field inspectors across the state. Eric has been involved with AAFCO as the co-chair of Feed and Feed Ingredient Manufacturing and on the training cadres for BITS and AITS. Before this role, Eric was the Stormwater Coordinator for the City of Crossville. Eric holds a master's degree in Agriculture and Natural Resource Systems Management from the University of Tennessee. In his spare time, he enjoys cattle farming and hunting.



Josh Arbaugh, President-Elect

Josh Arbaugh is a Chemist and Seed Analyst with the West Virginia Department of Agriculture. He graduated from West Virginia University with a BS in biology before joining the department in 2011. His work in the laboratory includes the analysis of animal feed, pet food, forage, seed, fertilizer, liming material, and food products. He began attending AAFCO meetings in 2013 and has been an active member of the Laboratory Methods and Services Committee and the Proficiency Testing Program Committee. Josh lives with his wife, two daughters, and three dogs in Charleston, West Virginia.



George Ferguson, Past President

George Ferguson currently works as the Feed Administrator for the North Carolina Department of Agriculture & Consumer Services, where he is responsible for the management of the NC Food and Drug Protection Division's Regulatory Feed Program. While growing up on a small dairy farm in western North Carolina, George developed a passion for agriculture that would eventually bring him to North Carolina State, where he graduated in 1994 with a BS degree in poultry science. While a student at North Carolina State, he had the good fortune to have an advisor who had purchased a small feed mill in Fuquay-Varina, where he would get his start in the feed manufacturing business. After graduation he worked briefly for Perdue Poultry in Ahoskie, North Carolina, but found himself drawn back into the world of feed, where he would spend the next 15 years. From farm store management to dealer development and sales, George worked with independent dealers of numerous feed manufacturing firms to include Southern States, Purina Mills, and Blue Seal Feeds. In 2012 George transitioned from industry to regulatory, as he accepted the position of Feed Safety Officer within the NC Food and Drug Protection Division, Animal Feed Program. He has since served as the Divisions Compliance Officer and now serves as the program's Administrator.



Ashlee-Rose Ferguson, Secretary-Treasurer

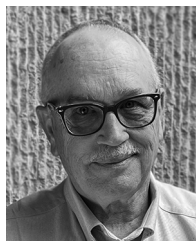
Originally hailing from outside of Philadelphia, Ashlee-Rose Ferguson obtained her bachelor of science in wildlife science from the State University of New York: College of Environmental Science & Forestry/Syracuse University. She went on to gain valuable public and environmental health experience with the Washington State Department of Health in the Zoonotic Disease section; Clemson University in the Department of Entomology, Soils, and Plant Sciences; and the South Carolina Department of Health & Environmental Control in Retail Food Protection and Vector Surveillance Programs. She moved back to Washington State in late 2017 to work with the Washington State Department of Agriculture's Animal Feed Program as their Animal Feed Regulatory Program Standards (AFRPS) Coordinator, now Interim Program Manager. Prior to her third cross-country move, Ashlee-Rose served as the Vice President for South Carolina Environmental Health Association. She is currently serving as the International Health Committee Vice Chair with Washington State Environmental Health Association, is a Registered Sanitarian/Registered Environmental Health Specialist, and a Cohort VII graduate of the International Food Protection Training Institute (IFPTI) Fellowship in Food Protection. When Ashlee-Rose is not working, she enjoys living in a lush temperate rainforest along a salmon spawning creek,

photography, traveling, and spending time with her loved ones (which include her fiancé, Vladimir, and their three cats: Koca, Luna, and Mickey, and probably a dog soon, too).



Dan King, Director

Dan King has worked for the Minnesota Department of Agriculture since 2009 in the commercial feed program, primarily as a compliance officer. Prior to working for the department, he worked at a small, independent coop handling feed, fertilizer, agronomy, and grain storage. Dan has five children, lives on a small farm raising cattle, and is active in local politics.



Darrell Johnson, Director

Darrell Johnson has a BS in animal science from Missouri State University and an MS and PhD in ruminant nutrition from the University of Kentucky. He spent 5.5 years as Extension Ruminant Nutrition Specialist at Mississippi State University before returning to Kentucky in 1989 as a Technical Service Specialist for a regional feed company. He became Executive Director of Regulatory Services at the University of Kentucky in 2012. In this role he oversees the direction of feed, fertilizer, seed, and milk regulations in the state. The regulations are set by state statute and are designed to provide consumers accuracy and completeness in the products they purchase. His division is also responsible for soil testing provided through the Extension Service. He is a member and past president of the American Registry of Professional Animal Scientists and is a Fellow in the American Society of Animal Science. He and his wife, Beth, live on a farm in central Kentucky where they raise cattle and goats. They have two adult children and two granddaughters.



Laura Scott, Director

Laura Scott is a National Manager in the Animal Feed Division of the Canadian Food Inspection Agency, where she is responsible for leading the feed regulatory modernization project and outreach and communications for the feed program. She graduated from the University of Guelph with a BSc in animal biology and an MSc in animal nutrition. Her experience with the Canadian Food Inspection Agency includes product registration, policy development, and regulatory development. Laura serves on AAFCO's Feed and Feed Ingredient Manufacturing Committee, Ingredient Definitions Committee, and Inspection and Sampling Committee and as a member of the AAFCO Board of Directors.



Bailey Whiten, Director

Bailey Whiten currently serves as the Assistant Division Director of the Ag Inputs Division at the Georgia Department of Agriculture, where she oversees the Feed Program and compliance of the Fertilizer and Seed Programs. She received her BS in animal science and dairy science from the University of Georgia. Bailey is a member of the AAFCO Pet Food Committee, Ingredient Definitions Committee, and Analytical Variances Workgroup. In her spare time, she enjoys camping with her husband and two dogs in their skoolie. Bailey lives with her husband and pets in a small town just southeast of Atlanta, Georgia.



Mark LeBlanc, Director

Mark LeBlanc serves as the Indiana State Chemist and Seed Commissioner. Prior to accepting his current role in 2020, he spent more than 20 years working in various state agriculture regulatory roles in Louisiana. He earned bachelor's, master's, and doctoral degrees in horticulture from Louisiana State University. LeBlanc and his wife, Ellen, currently reside in Lafayette, Indiana. They are the parents of 5 children between the ages of 27 and 17. LeBlanc was born and raised in the small town of Sunshine, Louisiana.



Austin Therrell, Executive Director

Austin Therrell currently serves as the Executive Director for the Association of American Feed Control Officials (AAFCO). Prior to his current role with AAFCO, he served on the Board of Directors and as the Co-Chair of the AAFCO Feed and Feed Ingredient Manufacturing Committee, as a member of the AAFCO Pet Food Committee, and as a member of the Current Issues and Outreach Committee.

Austin previously served as the Animal Feed Program Manager for the South Carolina Department of Agriculture, where he oversaw animal food inspection priorities across the state, product registrations, labeling compliance, and a statewide sampling program. He graduated from Clemson University in 2013 with a bachelor of science degree in animal and veterinary science and a minor in business administration.

Outgoing AAFCO Board Member

AAFCO would like to thank Hollis Glenn for his years of service.



Hollis Glenn, Director

Hollis Glenn is currently the Director of the Inspection and Consumer Services Division for the Colorado Department of Agriculture (CDA). In this role, Hollis oversees several regulatory programs associated with Colorado's agricultural industries, including the Commercial Feed and Produce Safety Program. He serves on the FDA Governing Council for the Partnership for Food Protection. In addition, Hollis was appointed by Governor Polis to serve on the Colorado Food System Advisory Council and was the recipient of the "Who's Who in Agriculture" award in 2020.

Committee Chair Biographies

CURRENT ISSUES AND OUTREACH COMMITTEE (CIOC)

This committee provides a forum to discuss new ideas or issues, promotes understanding and cooperation between government and industry, and disseminates relevant information.



Jo Lynn Otero, New Mexico Department of Agriculture, jotero@nmda.nmsu.edu

Jo Lynn Otero currently serves as the program manager in the Feed, Seed, and Fertilizer Section for the New Mexico Department of Agriculture. She has been with the department since 2014. She graduated from New Mexico State University with a BS and master's in agriculture extension education. She enjoys spending her free time with her family, going fishing and camping. She is an educator at heart and loves volunteering as a 4-H leader and working on 4-H projects with her boys. Otero serves on AAFCO's Pet Food Committee, Technology Committee, and Education and Training

Committee, and as co-vice chair of the AAFCO Current Issues and Outreach Committee.



Bethany McAnulty, Tennessee Department of Agriculture, Bethany.McAnulty@tn.gov

Bethany McAnulty is the Feed Program coordinator and Animal Food Regulatory Program Standards (AFRPS) coordinator for the Tennessee Department of Agriculture (TDA). She has been in this role since joining TDA in 2018. McAnulty holds a bachelor's degree from the University of Tennessee–Martin and is currently pursuing her master's degree from there as well. In her free time, McAnulty enjoys spending time with her daughter, husband, and two dogs, cheering on the Volunteers, or on the soccer field refereeing youth matches and training up-and-coming referees.

EDUCATION AND TRAINING COMMITTEE

This committee identifies education and training needs, materials, and approaches for AAFCO members, industry partners, and other national organizations.



Marissa Kost, North Carolina Department of Agriculture & Consumer Services, Marissa.Kost@ncagr.gov

Marissa Kost was born and raised in Ohio prior to moving to North Carolina to attend college. She graduated from North Carolina State University (NCSU) with a BS in animal science and poultry science. She continued her education at NCSU to receive her MS in poultry science with a minor in statistics. She has worked with the North Carolina Department of Agriculture and Consumer Services in the Animal Feed Program for almost 2 years as an agricultural compliance officer. Kost attended her first

AAFCO meeting in January 2018 in Fort Lauderdale, Florida. She has been a member of the Education and Training Committee since 2017 and has served as committee chair since May 2019. In her spare time, she enjoys traveling, cooking, and spending time with friends and family.

ENFORCEMENT ISSUES COMMITTEE

This committee provides a forum for the discussion, promotion, and development of uniform enforcement policies and actions by AAFCO members. This committee usually meets in closed session, for AAFCO members (regulatory) only.



Scott Ziehr, Colorado Department of Agriculture, scott.ziehr@state.co.us

Scott Ziehr currently serves as the Colorado Department of Agriculture Inspection and Consumer Services Division regulatory administrator. He has been with the department since 2005. He graduated from Texas A&M University with a bachelor's degree in animal science and master's degree in poultry science. Ziehr serves on AAFCO's Model Bill and Regulations Committee and is the chair of the AAFCO Enforcement Issues Committee.

FEED AND FEED INGREDIENT MANUFACTURING COMMITTEE

This committee works cooperatively with the U.S. Food and Drug Administration, Canadian Food Inspection Agency, feed and feed ingredient manufacturers, and other relevant domestic and international stakeholders, to develop science- and risk-based regulations.



Ken Bowers, Kansas Department of Agriculture, Ken.Bowers@ks.gov

Ken Bowers has worked with the Kansas Department of Agriculture in the Dairy and Feed Safety Division as the feed program specialist since 2002. Prior to his position with the Kansas Department of Agriculture, he worked for 17 years in the Quality Assurance Department for Farmland Industries in both the food and feed divisions. He served on the AAFCO Board of Directors from January of 2012 to December 2018. He also volunteers for several AAFCO committees.



Charles Hubenka, Nebraska Department of Agriculture, charles.hubenka@nebraska.gov

Charles (Charlie) Hubenka has been the AFRPS coordinator and Feed Program specialist with the State of Nebraska Department of Agriculture since March 2019. He started with the state in May of 2017, where he worked in livestock imports and the poultry program. As AFRPS coordinator, Hubenka led the team to achieve full implementation of the standards in March 2020 and maintained full implementation by FDA audit in August of 2022. Hubenka graduated from the University of Nebraska–

Lincoln in 2012 with a bachelor of science degree in animal science. He lives in Lincoln, Nebraska, with his wife Rae, son Cormac, dog River, and cat Elliot.

FEED LABELING COMMITTEE

This committee maintains Feed Labeling Guides and reviews labeling requirements, set forth by the Model Bill and Regulations Committee, to determine modifications needed to more effectively serve purchasers of commercial feed and feed manufacturers.



David Husner, Pennsylvania Department of Agriculture, dhusner@pa.gov

David Husner has worked with the Pennsylvania Department of Agriculture for 14 years, being involved in the animal feed program for 12 of those years. Prior to starting his career with the Pennsylvania Department of Agriculture, Husner received a bachelor's degree in agricultural science from Penn State University. In May 2014, Husner attended his first AAFCO meeting, the Feed Administrator's Seminar in Big Sky, Montana, and became the voting Control Official for Pennsylvania in January 2015. Husner assumed his first leadership role in AAFCO by becoming the chair of the

Feed Labeling Committee in August 2016.



Jamie Good, North Dakota Department of Agriculture, jgood@nd.gov

Jamie Good is the feed specialist for the North Dakota Department of Agriculture, responsible for administering the feed programs in the state. Good grew up on a dairy farm in central Wisconsin and attended college at the University of Wisconsin–River Falls, where he received a degree in animal science and agriculture business. Good started working for the North Dakota Department of Agriculture in 2013 and, in the spring of 2021, was hired as the state's feed specialist. Prior to working for the Department of Agriculture, Good worked for a regional feed company, Kent Nutrition

Group, at the cooperate headquarters in Muscatine, Iowa. Good currently lives in Bismarck with his wife, two sons, and their Siberian Husky, Glacier.

FINANCE COMMITTEE

This committee oversees financial planning to provide strategic advice, financial stability, and support to the Board of Directors. This committee usually meets in closed session, for AAFCO members (regulatory) only.



**Ashlee-Rose Ferguson, Washington State Department of Agriculture,
AFerguson@agr.wa.gov**

Originally hailing from outside of Philadelphia, Ashlee-Rose Ferguson obtained her bachelor of science in wildlife science from the State University of New York: College of Environmental Science & Forestry/Syracuse University. She went on to gain valuable public and environmental health experience with the Washington State Department of Health in the Zoonotic Disease section; Clemson University in the Department of Entomology, Soils, and Plant Sciences; and the South Carolina Department of Health & Environmental Control in Retail Food Protection and Vector Surveillance Programs. She moved back to Washington State in late 2017 to work with the Washington State Department of Agriculture's Animal Feed Program as their Animal Feed Regulatory Program Standards (AFRPS) Coordinator, now Interim Program Manager. Prior to her third cross-country move, Ashlee-Rose served as the Vice President for South Carolina Environmental Health Association. She is currently serving as the International Health Committee Vice Chair with Washington State Environmental Health Association, is a Registered Sanitarian/Registered Environmental Health Specialist, and a Cohort VII graduate of the International Food Protection Training Institute (IFPTI) Fellowship in Food Protection. When Ashlee-Rose is not working, she enjoys living in a lush temperate rainforest along a salmon spawning creek, photography, traveling, and spending time with her loved ones (which include her fiancé, Vladimir, and their three cats: Koca, Luna, and Mickey, and probably a dog soon too).

INGREDIENT DEFINITIONS COMMITTEE (IDC)

This committee serves as a clearinghouse for the development of feed ingredient definitions and provides and maintains a mechanism for the organization and distribution of information about ingredients and their use.



**Richard Ten Eyck, Oregon Department of Agriculture,
Richard.TENEYCK@oda.oregon.gov**

Richard Ten Eyck (pronounced "ten ike") was born and raised in Oregon and holds a BS in animal science from Oregon State University. His 37 years in the feed industry have covered all sides of the business, including ingredient buying, farm store sales, nutrition, formulation, and state regulatory. He is a past president of AAFCO, has served on several working groups that prepared comments on the FSMA rules, and is involved with the NASDA implementation team for the Animal Food Preventive Control Framework for states.

He is currently the feed safety specialist with the Oregon Department of Agriculture. The one-person state program regulates 400 mills making 5,000 products. He volunteers with AAFCO as chair of the Ingredient Definitions Committee and as a member of the Feed Labeling Committee.

Ten Eyck lives on a historic family farm in Sandy, Oregon, raising goats, Christmas trees, and hay. He has been married to his wife, Kim, for more than 40 years, and they have two adult daughters. He is a grandfather and a leader of the local 4-H livestock club.



Erin Bubb, Pennsylvania Department of Agriculture, ebubb@pa.gov

Erin Bubb received a BS in agricultural science from The Pennsylvania State University. She started her career with the Pennsylvania Department of Agriculture in 2000 as an inspector of feed, fertilizer, seed, and pesticide products. Currently, Bubb is the chief of Agronomic Products and Regional Inspection Services. She volunteers as the AAFCO Ingredient Definition Committee co-chair. Her favorite hobbies include gardening and spending time outdoors with her two dogs. Bubb lives with her husband and daughter in South Central Pennsylvania.

INSPECTION AND SAMPLING COMMITTEE

This committee works with domestic and international feed ingredient manufacturers and stakeholders to develop effective inspection and sampling procedures; promote the uniform application of those procedures for feed and feed ingredients; and evaluate, update, and maintain the AAFCO Inspector's Manual.



Chad Linton, West Virginia Department of Agriculture, clinton@ag.state.wv.us

Chad Linton is the deputy director of regulatory operations in the Regulatory and Environmental Affairs Division for the West Virginia Department of Agriculture (WVDA). He has worked for the WVDA for 26 years as a feed and food inspector, feed supervisor, and assistant director, before obtaining his current position. He has been an active member of AAFCO since 2004, and has served on the Board of Directors and as president of AAFCO in 2011. He has been chair, co-chair, and vice chair of the Inspection and Sampling Committee through the years.



Jamie Spencer, Kansas Department of Agriculture, Jamie.Spencer@ks.gov

Jamie Spencer works for the Kansas Department of Agriculture (KDA). Spencer graduated from Kansas State University in 1990 with a BS in animal science and industry. Spencer has been a KDA Feed Inspector since 2004. He has been a Field Supervisor and training officer for the KDA Dairy and Feed department, as well as a 507 cGMP instructor for the FDA during 2018–2019.

Laboratory Methods and Services Committee (LMSC)

This committee works with the state and federal regulators, regulated industry, and other stakeholders to promote communication among feed programs and laboratories; monitor and plan for emerging issues related to regulatory feed laboratory activities; and provide laboratories with new tools, trainings, and methods.



Kristi McCallum, Colorado Department of Agriculture, kristina.mccallum@state.co.us

Kristi McCallum is the laboratory manager for the Colorado Department of Agriculture (CDA), Division of Laboratory Services–Biochemistry Laboratory. McCallum has a BS in biology from the University of Northern Colorado. McCallum has been a microbiologist for over 28 years. During her 25 years at CDA, she has validated and implemented many methods for testing foods for *Salmonella*, *Shigella*, pathogenic *Escherichia coli*, *Listeria*, and bacterial toxins such as *Staphylococcus* enterotoxins.

She currently serves as the co-chair of the AAFCO Laboratory Services Committee and the vice chair of the Association of Public Health Laboratories (APHL) Human and Animal Food Testing Committee.



Dorota Inerowicz, Office of Indiana State Chemist, inerowic@purdue.edu

Dorota Inerowicz is the supervisor of the Feed Laboratory at the Office of Indiana State Chemist at Purdue University. She has been in this position for over 10 years. Analyses performed by the Feed Laboratory, mainly by chromatographic methods, include animal drug, vitamins, amino acids, and mycotoxins. Additionally, her section also performs other routine analyses such as sugars, starch, various fat analyses, and other requested test procedures, method development, and collaboration. In recent years, her section has also introduced testing for cannabinoids in hemp samples.

After her undergraduate education, Inerowicz earned a PhD in physical chemistry at the Technical University of Gdansk, Poland. She did postdoctoral work at the Swedish University of Agricultural Sciences in Uppsala and at Oklahoma University. For the past two decades, she has been associated with Purdue University. Before joining the Office of Indiana State Chemist, she held the manager position of the Mass Spectrometry Proteomics Facility at Purdue Discovery Park.

Other than her volunteer work with the Laboratory Method and Services Committee at AAFCO, she serves as co-chair of the AAFCO Fat-Soluble Vitamins Working Group.



Sharon Webb, University of Kentucky, sharon.webb@uky.edu

Sharon F. Webb is the director of quality at the University of Kentucky, Division of Regulatory Services. During her undergraduate education, she had the opportunity to work on 2 projects at the National Center for Toxicological Research. Upon receiving her bachelor of science in chemistry, she was admitted to Auburn University as a PhD student, receiving a full graduate assistantship in areas of national need for physical chemistry. After graduation, she became the manager of the mass spectrum facilities at the University of Alabama, where she was part of a team working in proteomics, examining products of ionizations of small proteins. She is currently the director of the Quality Program at the University of Kentucky's Division of Regulatory Services. In addition to her volunteer work with AAFCO, she is an active member of the Association of American Plant Food Control Officials (AAPFCO) Magruder Check Program Committee and Terms and Definitions Committee, and is the vice-chair of their Laboratory Services Committee. She has been an active leader of the Mineral and Trace Metals Group of the Methods Forum, associated with AAPFCO, and the study champion for the Association of Official Analytical Chemists International official method 2017.02. She has been married to Ken Webb for 26 years; has three children, Symantha, Matalyn, and Jacob; and four poodles. She is a lifetime fan of University of Kentucky men's basketball and loves meeting members of the Big Blue Nation when she

Model Bills and Regulations Committee

This committee provides recommendations to AAFCO's Board of Directors so that fair and just model bills and regulations are maintained and advocated by AAFCO regarding the production, labeling, distribution, and sale of commercial feed and production of non-commercial feed.



Doug Lueders, Life Member, aafco.doug@gmail.com

Doug Lueders, AAFCO Lifetime Member, is a former manager of the Minnesota Department of Agriculture's Commercial Feed Program. He is a past president of AAFCO, chairs the Model Bills and Regulations Committee, and serves on the Feed and Feed Ingredient Manufacturing Committee, Finance Committee, Strategic Affairs Committee, By-Laws Subcommittee, Ingredient Definitions Committee, Independent Conclusion of GRAS work group, and FSMA Implementation work group. Other professional volunteer work has included membership on the FDA FSMA Implementation Team, the FDA Partnership for Food Protection, the FDA Animal Food Safety System, the AFRPS development team, and the FDA Preventive Controls curriculum development team. In his spare time, Lueders volunteers as a youth firearms safety training instructor, tends his vineyard, and, along with Grandma, spoils their three grandchildren, Hudson, Olivia, and Isla.



Dan King, Minnesota Department of Agriculture, daniel.king@state.mn.us

Dan King has worked for the Minnesota Department of Agriculture since 2009 in the commercial feed program, primarily as a compliance officer. Prior to working for the department, he worked at a small, independent coop handling feed, fertilizer, agronomy, and grain storage. Dan has five children, lives on a small farm raising cattle, and is active in local politics.

Pet Food Committee (PFC)

This committee works cooperatively with FDA, the pet food industry, and other stakeholders to monitor, review, and recommend appropriate revisions to the Official Publication as related to pet food and specialty pet food.



Lizette Beckman, Washington State Department of Agriculture, lbeckman@agr.wa.gov

Liz Beckman is a feed advisor with the Washington State Department of Agriculture, Animal Feed Program. Her duties currently include country of origin reviews, animal feed standards, and commercial feed licensing. She is also responsible for collection and auditing of inspection fees. Beckman has served on various AAFCO committees. A cat and dog lover, she has two cats and one dog. In her free time, she enjoys gardening, hunting and fishing, and spending time with her niece.



Stan Cook, Life Member, stan.cook@aafco.org

Recently retired, Stan Cook managed the Missouri Department of Agriculture Bureau of Feed and Seed since 2011. He holds a bachelor of science degree in business administration from Lincoln University and is a graduate of the Missouri Agriculture Leadership of Tomorrow, Class I. Prior to the bureau, Cook served as a loan officer for the Missouri Agricultural and Small Business Development Authority. His experience in Missouri agriculture also includes 25 years in commercial livestock production. He served nine years as a member of the Board of Directors of Farm Credit Services, serving as vice chairman of the Eastern Missouri Farm Credit Board, and has served as a member of the Executive Committee of the Central Production Credit Association Board. He has worked as a USDA Certified Market Reporter, responsible for a voluntary direct price-reporting program for hogs, pigs, and timber, and also as a relief auction reporter. Cook serves on various AAFCO committees and is vice chair of the Strategic Affairs Committee and the Pet Food Committee. He served on the AAFCO Board of Directors from 2014 to 2020 and as its president in 2018. He continues to live and work on a sixth-generation farm near California, Missouri.

Proficiency Testing Program Committee

This committee supports regulatory, industry, and commercial feed laboratories by providing a proficiency testing program that is ISO/IEC 17043:2010 accredited by ANAB and compliant with international guidelines.



Sally Flowers, Kansas Department of Agriculture, Sally.Flowers@ks.gov

Sally Flowers is the laboratory director at the Kansas Department of Agriculture. Her education includes a BS in animal science (University of Florida), MS in animal science (Penn State), PhD in food science (Penn State), and BS in clinical laboratory science (University of Nebraska Medical Center). She is active in the Association of Public Health Laboratories as a member of the Board of Directors and the Human and Animal Food Committee, as well as in the Association of Food and Drug Officials, the Association of American Feed Control Officials, and the Association of American Plant

Food Control Officials (Magruder Newsletter editor).

Strategic Affairs Committee

This committee provides the AAFCO Board of Directors with advice and support regarding strategic direction, planning, tracking, and implementation of related association activities and stability.



Linda Morrison, Life Member, lindaaafco@gmail.com

Linda Morrison has a postgraduate education in animal science from Macdonald College of McGill University. She has almost three decades of experience managing the Feed Program in Canada and was the director of the Animal Feed Division, Canadian Food Inspection Agency (CFIA) (1982–2012). Morrison also worked with the CFIA's Inspection Modernization Office to develop the Integrated Agency Inspection Model for a common approach to inspecting food and animal and plant health.

Morrison has been an active AAFCO member since 1986. She has served as chair of the Strategic Affairs Committee for many years and led Strategic Planning activities. She has served on

the Board of Directors and was president in 1998-1999. Morrison retired from the CFIA in 2016, whereupon she became a Life Member to continue to support AAFCO.

Technology Committee

This committee provides advice and counsel to AAFCO's Board of Directors and committees on all matters related to information technology needs, systems development, and related budgetary issues.



George Ferguson, North Carolina Department of Agriculture & Consumer Services, George.Ferguson@ncagr.gov

George Ferguson currently works as the Feed Administrator for the North Carolina Department of Agriculture & Consumer Services, where he is responsible for the management of the NC Food and Drug Protection Division's Regulatory Feed Program. While growing up on a small dairy farm in western North Carolina, George developed a passion for agriculture that would eventually bring him to North Carolina State, where he graduated in 1994 with a BS degree in poultry science. While a student at North Carolina State, he had the good fortune to have an advisor who had purchased a small feed mill in Fuquay-Varina, where he would get his start in the feed manufacturing business. After graduation he worked briefly for Perdue Poultry in Ahoskie, North Carolina, but found himself drawn back into the world of feed, where he would spend the next 15 years. From farm store management to dealer development and sales, George worked with independent dealers of numerous feed manufacturing firms to include Southern States, Purina Mills, and Blue Seal Feeds. In 2012 George transitioned from industry to regulatory, as he accepted the position of Feed Safety Officer within the NC Food and Drug Protection Division, Animal Feed Program. He has since served as the Divisions Compliance Officer and now serves as the program's Administrator.

General Session Agenda
2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Monday, July 31, 2023
8:30 AM

Agenda

8:30 AM Opening Remarks, President Eric Brady, Tennessee Department of Agriculture

8:35 AM Introduction and Welcome to Maryland, Kevin Atticks, Secretary of Agriculture



Kevin Atticks was appointed Secretary of Agriculture on Jan. 17, 2023. Prior to his appointment, Atticks was CEO (and founder) of Grow & Fortify, a nonprofit that supports value-added agricultural organizations and the businesses they represent. Grow & Fortify published the first assessment of the state’s value-added agricultural industry, illustrating the expansive impact generated by this sector, which includes wineries, creameries, meat processing, agritourism, equine, and dozens of other industry segments. Atticks was also the

Executive Director of the Maryland Wineries Association, Brewers Association of Maryland, and the Maryland Distillers Guild and served as the President of the Maryland Agricultural Resource Council, and the Chair of the WineAmerica State and Regional Associations Advisory Council.

Atticks currently serves on the University of Maryland College of Agriculture’s Global Leadership Council, the board of Future Harvest, and the board of the Maryland Tourism Coalition.

8:50 AM Memorials, Immediate Past President George Ferguson
North Carolina Department of Agriculture and Consumer Services

8:53 AM Presentation of 2023 Awards, President Eric Brady, Tennessee Department of Agriculture

- E. B. Vorhees Award, Richard Ten Eyck—For a career of outstanding vision, leadership, promotion, and dedication to the association and assuring safe animal feed

9:00 AM Association Business Meeting, President Eric Brady, Tennessee Department of Agriculture

Association Business Meeting Agenda

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Monday, July 31, 2023
9:00–10:15 AM
Maryland D & C

Agenda

1. **Meeting Called to Order < > CT**
2. **Welcome and Opening Remarks:** Eric Brady, President
3. **Acknowledgement of Award:** Eric Brady, President
Presidential Award
 - E.B. Vorhees Award, Richard Ten Eyck – For a career of outstanding vision, leadership, promotion, and dedication to the Association and assuring safe animal feed.
4. **Roll Call:** Eric Brady, President
5. **Acceptance of Committee Reports from:** Current Issues and Outreach, Education and Training, Feed and Feed Ingredient Manufacturing, Feed Labeling, Inspection and Sampling, Ingredient Definition, IDC E-Meeting (3.2.23), Laboratory Methods and Services, Model Bills and Regulations, MBRC March/April E-Meeting, Pet Food, PFC E-Meeting (3.10.23) Proficiency Testing Program, Strategic Affairs, Strategic Affairs Addendums 1 and 2 – Josh Arbaugh, President-Elect (Reports are published on the AAFCO website on the 2023 Annual Meeting page, right side, under the heading “Committee Reports.”)
< > moves to accept committee reports. < > seconds. Motion < >.
6. **Acceptance of Committee Recommendations:** Eric Brady, President
 - a. **Ingredient Definition Committee Recommendations:**
 - i. IDC recommends publishing a new feed term “**Freeze Dried**”, to be added to page 357 of the 2023 printed OP.
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.
Board recommends acceptance. < > moves; < > seconds; motion < >.
 - ii. IDC recommends publishing **New Official Definition: T33.29(A) Black Soldier Fly Larvae Oil to Official** and replace the existing official definition on page 405 of the 2023 printed OP.
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”. (proposed 2022, adopted 2023)
Board recommends acceptance. < > moves; < > seconds; motion < >.

- iii. IDC recommends publishing a New Official Definition: **T36.11 ____ Dried Fermentation Product to Official** (removing it from page 409 of the 2023 OP) relating to organisms to allow the use of *Lactobacillus diolivorans* as a silage inoculant. Replacing the existing official definition on page 407
- 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* 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.] (Proposed 2022, adopted 2023)
- Board recommends acceptance. < > moves; < > seconds; motion < >.**
- iv. IDC recommends publishing an amended **Swine Health Protection Act guidance language** in Sections 40 (page 409) and 60 (page 438) of Chapter 6.
- **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)*
- (a) Reminder:
- (i) 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:
 - (ii) 40.96 Food Processing Waste
 - (iii) 40.97 Restaurant Food Waste
 - (iv) 60.108 Salvage Pet Food
 - (v) 60.117 Black Soldier Fly Larvae
- Board recommends acceptance. < > moves; < > seconds; motion < >.**
- v. IDC recommends adding the **Sunsetting Language** to the “Guide for Submission” at beginning of Chapter 6, in the last paragraph of the “Investigator” section.
- When the revision includes a modification or change to the ingredient name, the old name should be removed through a sunseting 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 sunseting period. (Add after the final paragraph for The Investigator - A Guide to Submitting New or Modified Ingredient Definitions to AAFCO)*
- Board recommends acceptance. < > moves; < > seconds; motion < >.**

- vi. IDC recommends making 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

**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 recommends acceptance. < > moves; < > seconds; motion < >.

- vii. IDC recommends publishing **new feed term “Finished Feed” on page 357 of the 2023 printed OP.**

Finished Feed. A product which has undergone all the feed manufacturer’s intended manufacturing processes prior to entering into commerce. Some types of finished feed may be:

1. Fed directly to animals, such as complete feeds, supplement feeds, and Type C medicated feeds; or
2. Intended only for further manufacture of feed, such as premixes.

Board recommends acceptance. < > moves; < > seconds; motion < >.

- viii. IDC recommends publish a New Tentative Definition: T9.41 Meat and Bone Meal on page 374 of the 2023 printed OP.

T9.41 Meat and Bone Meal is the rendered product from mammal tissues, including bones, exclusive of any added blood, 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 is a source of protein in animal diets. 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, minimum Phosphorus (P) and minimum and maximum Calcium (Ca). If the product bears a name descriptive of its kind, composition or origin, it must correspond thereto.

Board recommends acceptance. < > moves; < > seconds; motion < >.

- ix. IDC recommends sunsetting 48.13 Corn Gluten Feed in 2025 from Collective Terms and add new T48.135 Corn Protein Feed for 2023. This is in accordance with the changes being made in Section 48 for these two ingredients.

48.13 Corn Gluten Feed (remove 2025)

T48.135 Corn Protein Feed

(Add the removal year to page 414 of the 2023 OP, and add the tentative to page 416)

Board recommends acceptance. < > moves; < > seconds; motion < >.

- x. IDC recommends sunsetting 48.14 Corn Gluten Meal in 2025 from Collective Terms and add new T48.145 Corn Protein Meal for 2023. This is in accordance with the changes being made in Section 48 for these two ingredients.

48.14 Corn Gluten Meal (remove 2025)

T48.145 Corn Protein Meal

(Add the removal year to page 414 of the 2023 OP, and add the tentative to page 416)

Board recommends acceptance. < > moves; < > seconds; motion < >.

xi. IDC Recommends publishing AGRN 50 Beta-glucanase to table 101.1

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)
50 (PDF -50 pages)	Agrivida, Inc.	Ground grain obtained from a corn (<i>zea mays</i>) variety that expresses an altered AC1 beta-glucanase gene obtained from an environmental DNA library (transformation event FG259)	Beta-glucanase	Utility information not evaluated for GRAS, see FDA's letter for more information.	Swine	10/25/21	FDA has no questions. (PDF – 4 pages)

Board recommends acceptance. < > moves; < > seconds; motion < >.

xii. IDC recommends publishing AGRN 58 Alpha-lipoic acid to table 101.1

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)
58 (PDF - 83 pages)	Hill'sPet Nutrition Inc.	Alpha- Lipoic Acid	Alpha-lipoic acid	Utility information not evaluated for GRAS, see FDA's letter for more information.	Adult dogs (non-gestating and non-lactating)	5/2/22	FDA has no questions. (PDF - 3 pages)

Board recommends acceptance. < > moves; < > seconds; motion < >.

b. **Pet Food Committee and Model Bill and Regulations Committee Recommendation:**

- i. PFC and MBRC recommend the current language in the Official Publication Model Regulations for Pet Food and Specialty Pet Food Under the Model Bill (page 139 through page 151 of the 2023 AAFCO OP) be stricken and replaced with (Appendix A).

**Membership is voting on the final version of the AAFCO Model Pet and Specialty Pet Food Regulations as reviewed, edited, and recommended by the Model Bill and Regulations Committee in cooperation with the AAFCO Pet Food Committee.*

Board recommends acceptance. < > moves; < > seconds; motion < >.

c. **Pet Food Committee:**

- i. The Pet Food Committee Recommendation (e-vote - 5/9/23):
The Pet Food Committee recommends that AAFCO establish, as an official position, a recommended six year enforcement discretion period in regard to implementation of the new Model Pet Food and Specialty Pet Food Regulations. The date of the 6-year period should begin based on the date that the 2024 printed Official Publication is offered, and the recommended enforcement discretion period should be evaluated annually, taking into consideration issues or challenges that may arise related to total dietary fiber,

including but not limited to methodology alignment, instrumentation procurement, and the length of time to build datasets. In addition, challenges associated with software development related to market activities that include label development, formulation development, and website/ecommerce platforms should be considered as well as access to support services related to packaging design, printing, and laboratory analysis.

Board recommends acceptance. < > moves; < > seconds; motion < >.

- ii. The Pet Food Committee recommends Placing the Facts Box Examples and Key guidance document immediately after PF12. (Appendix B)
- d. **Model Bills and Regulations Committee Recommendation:**
- i. The Model Bills and Regulations Committee recommends 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 recommends acceptance. < > moves; < > seconds; motion < >.**
- e. **Strategic Affairs Committee Recommendation:**
- i. The Strategic Affairs Committee recommends revising the By-Laws Article IV change Section 1 (page 84 of the 2023 printed OP) to include the portion in red:
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 recommends acceptance. < > moves; < > seconds; motion < >.
 - ii. The Strategic Affairs Committee recommends publishing the Resolutions Policy Guidance in the Official Publication immediately after the Policy for Resolutions (pages 235-236 of the printed 2023 OP).

**AAFCO Resolution Guidance
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**
 - o 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.
 - o 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
 - o 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”**
 - o 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.”
 - o In addition to your resolution, submit a one-page summary not to exceed one page explaining the purpose and background.

- **Submission Guidance:**
 - o A resolution must have a Resolution Sponsor.
 - o Contact the Executive Director for any assistance.
 - o 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:**
 - o The Resolution Sponsor may attend the Board meeting to discuss the resolution. Be prepared to answer questions.

Adoption Process

- The President-Elect is 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 bylaws 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.

Board recommends acceptance. < > moves; < > seconds; motion < >.

- iii. 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 italics:
 - (a) "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.*
 - (b) "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 recommends acceptance. < > moves; < > seconds; motion < >.

- iv. The Strategic Affairs Committee recommends editing both the Procedures Manual and OP regarding 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 recommends acceptance. < > moves; < > seconds; motion < >.

f. **Nomination Committee:**

The Nominating Committee recommends the following slate for Board of Directors effective after Midyear 2024.

President: Joshua Arbaugh, WV

President-Elect: Laura Scott, CAN

Secretary-Treasurer: Ashlee-Rose Ferguson, WA

Director: Dan King, MN

Director: Bailey Whiten, GA

Director: Kate Nelson, CT

Director: Trish Dunn, IN

Director: David Dressler, PA

Immediate Past President: Eric Brady, TN

Board recommends acceptance. < > moves; < > seconds; motion < >.

7. **Credential Report: FASS**

Number of voting members represented:

Number of states in attendance:

Number of countries:

Number of FDA representatives:

Number of life members:

Total meeting attendance:

8. **Meeting Concluded at < > CT.**

Model Regulations for Pet Food and Specialty Pet Food Under the Model Bill

Section Editor—Lizette Beckman

These Model Regulations are approved by the Association of American Feed Control Officials (AAFCO) under the Model Bill and in conjunction with the Model Regulations. States proposing to adopt these Model Regulations for Pet Food and Specialty Pet Food under their own state feed law are encouraged to adopt AAFCO’s Model Regulations for feed, which also apply to pet food and specialty pet food, unless otherwise noted within these regulations. Pursuant to due publication and public hearing required by the provisions of Chapter ___ of the Laws of this State, the ___ has adopted the following Rules and Regulations.

Regulation PF1. Definitions and Terms

The definitions in the Model Bill and Model Regulations shall apply in addition to the following:

- (a) “All Life Stages” means gestation/lactation, growth, and adult maintenance life stages for dogs, cats, and other mammals or adult (including breeding animals) and juvenile life stages for non-mammalian species.
- (b) “Daily Food” means a specialty pet food product, other than a treat, food mixer or food supplement, for specialty pet species with no recognized nutritional authority.
- (c) “Family” means a group of products, which are nutritionally adequate for any or all life stages based on their nutritional similarity to a lead product, which has been successfully test-fed according to an AAFCO feeding protocol(s).
- (d) “Familiar Household Unit” means a typical feeding unit in volume or count (e.g., can, measuring cup, treat, or piece).
- (e) “Food Mixer” means a pet or specialty pet food product that is intended to top, accompany, or contribute to a complete diet but is not generally intended to be a complete diet.
- (f) “Food Supplement” means a pet or specialty pet food product that is intended to supply specific nutrient(s) or other food components but is not a complete diet.
- (g) “Immediate Container” means the unit, can, box, tin, bag, or other receptacle or covering in which a pet food or specialty pet food is displayed for sale to retail purchasers, but does not include containers used as shipping containers.
- (h) “Ingredient Statement” means a collective and contiguous listing on the label of the ingredients of which the pet food or specialty pet food is composed.
- (i) “Pet Nutrition Facts” means a graphic box located on the label containing nutritional information for a pet food product.
- (j) “Principal Display Panel” means the part of a label that is most likely to be displayed, presented, shown, or examined under normal and customary conditions of display for retail sale.
- (k) “Specialty Pet Nutrition Facts” means a graphic box located on the label containing nutritional information for a specialty pet food product.
- (l) “Veterinary Diet” means a pet or specialty pet food product that is intended to be used under veterinary supervision only.

Regulation PF2. Label Format and Labeling

- (a) Pet food and specialty pet food shall be labeled with the following information prescribed

in this Regulation:

- (1) Product name and brand name, if any, on the principal display panel as stipulated in Regulation PF3;
 - (2) A Statement specifying the intended use of the products as stipulated in Regulation PF4(a);
 - (3) Quantity statement, as defined in Section 3(s) of this Act and Regulation 3(a)(8) of the Model Regulations, by weight (pounds and ounces, and metric), liquid measure (quarts, pints, and fluid ounces, and metric) or by count, on the principal display panel;
 - (4) Pet Nutrition Facts or Specialty Pet Nutrition Facts as stipulated in Regulation PF5;
 - (5) Ingredient statement as stipulated in Regulation PF6(a);
 - (6) Feeding directions as required under Regulation PF8;
 - (7) Name and address of the manufacturer or distributor as stipulated in Regulation PF11; and
 - (8) Handling and Storage Instructions may be displayed as stipulated in PF12.
- (b) When a pet food or specialty pet food enclosed in an outer container or wrapper is intended for retail sale, all required label information shall appear on the outer container or wrapper.
- (c) A vignette, graphic, or pictorial representation on a pet food or specialty pet food label shall not misrepresent the contents of the package.
- (d) The use of the word “proven” in connection with a label claim for a pet food or specialty pet food is not permitted unless the claim is substantiated by scientific or other empirical evidence.
- (e) No statement shall appear upon the label or labeling of a pet food or specialty pet food which makes false or misleading comparisons between that product and any other product.
- (f) A personal or commercial endorsement is permitted on a pet food or specialty pet food label provided the endorsement is not false or misleading.
- (g) A statement on a pet food or specialty pet food label stating “Improved,” “New,” or similar designation shall be substantiated and limited to six (6) months production.
- (h) A statement on a pet food or specialty pet food label stating preference or comparative attribute claims shall be substantiated and limited to one (1) year production, after which the claim shall be removed or re-substantiated.
- (i) Raw milk distributed as pet food or specialty pet food shall bear the following statement **“WARNING: NOT FOR HUMAN CONSUMPTION - THIS PRODUCT HAS NOT BEEN PASTEURIZED AND MAY CONTAIN HARMFUL BACTERIA.”** This statement shall be displayed in a conspicuous manner and shall not be smaller than the height of the minimum font required by the Federal Fair Packaging and Labeling Act for the net quantity statement as shown in the following table:

Panel Size	Minimum Warning Statement Type Size
$\leq 5 \text{ in.}^2$	1/16 in.
$> 5 - \leq 25 \text{ in.}^2$	1/8 in.
$> 25 - \leq 100 \text{ in.}^2$	3/16 in.
$> 100 - \leq 400 \text{ in.}^2$	1/4 in.

$>400 \text{ in.}^2$ $1/2 \text{ in.}$

- (j) When pet food or specialty pet food consists of raw milk, the words, “Raw [blank] Milk” shall appear conspicuously on the principal display panel (blank is to be completed by using the species of animal from which the raw milk is collected).

Regulation PF3. Brand and Product Names

- (a) The names of the ingredient(s) used in the brand or product name or elsewhere on the product label shall appear in order of predominance by weight in the product. Names of flavors due to their varying intensity can be in any order.
- (b) The words “100%,” or “All,” or words of similar designation shall not be used in the brand or product name of a pet food or specialty pet food if the product contains more than one ingredient.
- (c) An ingredient or combination of ingredients may form part of a brand or product name of a pet food or specialty pet food:
- (1) When the named ingredient(s) constitutes at least 95% of the total weight of the product. Water sufficient for processing may be excluded when calculating the percentage; however, the named ingredients shall constitute at least 70% of the total product weight.
 - (2) When any named ingredient(s) constitutes at least 25% of the total weight of the product, provided that:
 - A. Water sufficient for processing may be excluded when calculating the percentage; however, the named ingredient(s) shall constitute at least 10% of the total product weight; and
 - B. A descriptor is used with the ingredient name(s). This descriptor shall imply other ingredients are included in the product formula. Examples of descriptors include “dinner,” “platter,” “entree,” “formula,” and “recipe”; and
 - C. The descriptor shall be in the same size, style, and color print as the ingredient name(s).
 - (3) When a combination of ingredients which are included in the brand or product name in accordance with Regulation PF3(c) provided that:
 - A. Each named ingredient constitutes at least 3% of the total weight of the product, excluding water sufficient for processing; and
 - B. All such ingredient names appear on the label in the same print size, style, and color print.
- (d) When the name of any ingredient appears in the brand or product name of a pet food or specialty pet food or elsewhere on the product label and includes a descriptor such as “with” or similar designation, the named ingredient(s) must each constitute at least 3% of the product weight exclusive of water sufficient for processing. The 3% minimum level shall not apply to claims for nutrients, such as, but not limited to, vitamins, minerals, and fatty acids, as well as condiments. The word “with,” or similar designation, and named ingredients shall be in the same size, style, color, and case print and be of no greater size than:

Panel Size	Maximum “With” Claim Type Size
≤5 in. ²	1/8 in.
>5 – ≤25 in. ²	1/4 in.
>25 – ≤100 in. ²	3/8 in.
>100 – ≤400 in. ²	1/2 in.
>400 in. ²	1 in.

- (e) A flavor designation may be included as part of the product name or elsewhere on the label of a pet food or specialty pet food when the flavor designation meets all of the following:
- (1) The flavor designation:
 - A. Conforms to the name of the ingredient as listed in the ingredient statement; or
 - B. Is identified by the source of the flavor in the ingredient statement; and
 - (2) The word “flavor” is printed in the same size type and with an equal degree of conspicuousness as the name of the flavor designation; and
 - (3) Substantiation of the flavor designation, the flavor claim, or the ingredient source is provided upon request.
- (f) Contractions or coined names referring to ingredients shall not be used in the brand name of a pet food or specialty pet food unless it is in compliance with Regulation PF3(c), (d), or (e).
- (g) Unless a pet food and specialty pet food is identified on the principal display panel as a stew, gravy, sauce, broth, aspic, juice, milk replacer, or other such name, the maximum moisture declared on a pet food or specialty pet food label shall not exceed 78.00% or the natural moisture content of the ingredients, whichever is higher.

Regulation PF4. Intended Use Statement and Nutritional Adequacy Claims

- (a) A statement identifying the intended use of a pet food or specialty pet food is required on the principal display panel of the label in accordance with the following:
- (1) The intended use of a pet food or specialty pet food shall be stated as:
 - A. “Complete [Species] Food” – for food products intended to be the complete diet for all life stages and sizes of a pet or specialty pet in accordance with the unqualified claims in Regulation PF4(b);
 - B. For food products intended to be the complete diet for a limited life stage or size of a pet or specialty pet in accordance with the qualified claims in Regulation PF4(c), one of the two following statements shall be used:
 - i. “Complete Food for [blank]” where the blank shall be filled with one or more of the following:
 - aa. “Adult [Species],”
 - bb. “Puppies,” “Kittens,” or “Juvenile [Species other than dog or cat],”
 - cc. “Puppies (<70 lb. as an adult),” or
 - dd. “Dogs (except puppies >70 lb. as an adult);” or
 - ii. “Complete [Blank] Food” where the blank shall be filled with one or more of the following:
 - aa. “Adult [Species],”

- bb. “Puppy,” “Kitten,” or “Juvenile [Species other than dog or cat],”
 - cc. “Puppy (<70 lb. as an adult),” or
 - dd. “Dog (except puppies >70 lb. as an adult);”
- C. “Veterinary Diet for [Species]” – for food products intended to be used under veterinary supervision only in accordance with Regulation PF4(d);
 - D. “[Species] Treat” – for food products for pets or specialty pets, provided occasionally for enjoyment, training, entertainment, or other purposes, and not generally intended or represented to be a complete food or nutritional supplement;
 - E. “[Species] Food Supplement” – for food products for pets or specialty pets that are intended to supply specific nutrient(s) or other food components but are not a complete diet;
 - F. “[Species] Food Mixer” – for food products for pets or specialty pets that are intended to top, accompany, or contribute to a complete diet but are not generally intended or represented to be a complete diet; or
 - G. “Daily [Specialty Pet Species] Food” – for food products that are intended to be the daily diet for specialty pets where no recognized nutritional authority exists. A limited life stage may be indicated, i.e., “Daily [Specialty Pet Species] Food for [Juveniles or Adults].”
- (2) This intended use statement shall:
- A. Appear within the bottom 30% of the area of the label principal display panel in lines generally parallel to the base on which the package rests as it is designed to be displayed and shall be repeated on the alternate principal display panel, if present. However, on packages having a principal display panel of 5 square inches or less, the requirement for placement within the bottom 30% of the area of the label panel shall not apply;
 - B. Be at least as large as the statement of net quantity, consistent with 16 CFR 500.21;
 - C. Appear in the same color and style as the statement of net quantity and on the same background color as the statement of net quantity; and
 - D. Be separated by at least a space equal to the height of the letter “N” used in the statement of net quantity from other printed label information appearing above or below it and by at least a space equal to twice the width of the letter “N” of the style of type used in the quantity of contents statement from other printed label information appearing to the left or right of it.
- (b) The label of a pet food or specialty pet food which is intended for all life stages and sizes of the pet or specialty pet may make unqualified claims, directly or indirectly, such as “complete and balanced,” “perfect,” “scientific,” or “100% nutritious” if at least one of the following apply:
- (1) The product meets the nutrient requirements for all life stages and sizes established by an AAFCO-recognized nutrient profile; or
 - (2) The product meets the criteria for all life stages as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol(s);
 - A. Unqualified claims of nutritional adequacy that include large size dogs (greater than 70 lb. as an adult) can be substantiated by completing the appropriate protocols using large size dogs; or

- B. Can be substantiated by completing the appropriate protocols using dogs less than 70 lb. adult weight while containing no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles; or
- (3) The product is a member of a product family which is nutritionally similar to a lead product which contains a combination of ingredients that has been fed to a normal animal as the sole source of nourishment in accordance with the testing procedures established by AAFCO for all life stages, provided that:
 - A. The nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and
 - B. The family product meets the criteria for all life stages; and
 - C. Under circumstances of reasonable doubt, the [State Control Official] may require the manufacturer to perform additional testing of the family product in order to substantiate the claim of nutritional adequacy.
- (c) The label of a pet food or specialty pet food which is intended for a limited purpose (such as size of dog) or a specific life stage, but not for all life stages and sizes, may make qualified claims, directly or indirectly, such as “complete and balanced,” “perfect,” “scientific,” or “100% nutritious” when the product and claim meet both of the following:
 - (1) The claim is qualified with a statement of the limited purpose or specific life stage for which the product is intended or suitable, for example, “complete and balanced for puppies (or kittens).” The claim and the required qualification shall be juxtaposed on the same label panel and in the same size, style, and color print; and
 - (2) The product meets at least one of the following:
 - A. The nutrient requirements for the limited purpose or specific life stage established by an AAFCO-recognized nutrient profile; or
 - B. The criteria for a limited purpose or a specific life stage as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol(s);
 - i. Qualified claims of nutritional adequacy that include large size dogs can be substantiated by completing the appropriate protocols using large size dogs; or
 - ii. Can be substantiated by completing the appropriate protocols using dogs less than 70 lb. adult weight while containing no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles; or
 - C. The requirements of a product family which is nutritionally similar to a lead product which contains a combination of ingredients which, when fed for such limited purpose, will satisfy the nutrient requirements for such limited purpose and has had its capabilities in this regard demonstrated by adequate testing, and provided that:
 - i. The nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and
 - ii. The family product meets the criteria for such limited purpose; and
 - iii. Under circumstances of reasonable doubt, the [State Control Official] may require the manufacturer to perform additional testing for the family product to substantiate the claim of

nutritional adequacy.

- (d) A product intended for use by, or under the supervision or direction of, a veterinarian shall clearly indicate the nutritional adequacy of the product in accordance with Regulation PF5(a)(3)(F) or PF5(b)(2)(F) as would be required for any other pet food or specialty pet food.
- (e) A signed affidavit attesting that the product meets the requirements of Regulation PF4(b) or PF4(c)(2) shall be submitted to the _____ upon request.
- (f) If the nutrient content of a product does not meet those nutrient requirements established by an AAFCO-recognized nutrient profile, or if no requirement has been established by an AAFCO-recognized nutritional authority for the life stage(s) of the intended species, the claimed nutritional adequacy of the product shall be scientifically substantiated.
- (g) The following AAFCO-recognized nutritional authority, nutrient profile, and/or animal feeding protocol shall be acceptable as the basis for a claim of nutritional adequacy:
 - (1) As an AAFCO-recognized nutrient profile or nutritional authority:
 - A. For dogs, the AAFCO Dog Food Nutrient Profiles;
 - B. For cats, the AAFCO Cat Food Nutrient Profiles;
 - C. For specialty pets, the nutrient recommendations approved by the Committee on Animal Nutrition of the National Research Council of the National Academy of Sciences, provided that, this nutrient recommendation is recognized only for the specific specialty pet for which the profile is intended.
 - (2) As an AAFCO-recognized animal feeding protocol(s), the AAFCO Dog and Cat Food Feeding Protocols.
- (h) When the label of a pet food or specialty pet food includes a comparison of the nutrient content of the food with levels established by an AAFCO-recognized nutrient profile such as a table of comparison, a percentage, or any other designation referring to an individual nutrient or all of the nutrient levels, the following apply:
 - (1) The product shall meet the AAFCO-recognized nutrient profile; and
 - (2) The statement of comparison shall be preceded by a statement that the product meets the AAFCO-recognized profile; however, the statement that the product meets the AAFCO-recognized nutrient profile is not required provided that the nutritional adequacy statement as per Regulation PF4(b)(1) or PF4(c)(2)(A) appears elsewhere on the product label; and
 - (3) The statement of comparison of the nutrient content shall constitute a guarantee and shall be in the nutrient guarantees within the pet or specialty pet nutrition facts; and
 - (4) The statement of comparison shall appear on the label separate and apart from the nutrient guarantees within the pet or specialty pet nutrition facts.

Regulation PF5. Pet and Specialty Pet Nutrition Facts

- (a) **Pet Nutrition Facts** shall be displayed in a prominent place on the label of all pet foods (including treats, food supplements, veterinary diets, and food mixers), but not necessarily on the principal display panel. The information shall be set off in a box by use of hairlines and shall be all black or one-color type, printed on a white or other neutral contrasting background so as to be clearly visible under the heading “Pet Nutrition Facts” that is centered in the top row of the box and twice the size of all other text in the box. A hairline rule that is centered between the lines of text shall separate “Pet Nutrition Facts” from the next line of text. The box contains the following required elements with all text the same

size and style in the following order:

- (1) The stated whole familiar household unit (e.g., can, measuring cup, treat, or piece), consistent with the feeding directions, and its weight in grams shall be right justified. This is set off by a bold line centered between this and the next line of text.
- (2) A statement of Calorie content, determined as specified in Regulation PF9, shall include the following:
 - A. The Calorie content of the product shall be stated after the left justified heading:
 - i. “Calories per [familiar household unit][†]: [#]” when the Calorie content is determined in accordance with Regulation PF9(a)(1); or
 - ii. “Calories per [familiar household unit] (fed): [#]” when the Calorie content is determined in accordance with Regulation PF9(a)(2).
 - B. Below the Calorie content statement, the number of Calories contributed by Protein, Fat, and Carbohydrate shall be declared, in that order, after “From:”. The “From:” line shall be indented to reflect that it is a component of the total Calories on the line above. If the total Calorie content of the product is determined by feeding trial in accordance with Regulation PF9(a)(2), then “+” shall be declared immediately after the number of Calories from Carbohydrates. The determination of Calories from protein, fat, and carbohydrate are as described in Regulation PF9(c). This is set off by a bold line centered between this and the next line of text.
- (3) The nutrient guarantees shall appear under the headers “Nutrients” that is left justified to the edge of the box, “Guaranteed” that is right justified to a vertical hairline that runs from this line of text to the last guaranteed nutrient value, and “per [familiar household unit]” that is right justified to the edge of the box. The amount “per [familiar household unit]” for each nutrient is determined by multiplying the guaranteed amount (concentration) by the number of grams in the familiar household unit and shall include the resultant unit of such amount (e.g., grams, milligrams, or international units). The guarantees shall be listed in the following order with a hairline centered between each line of text:
 - A. A pet food label shall list the following required guaranteed amounts, stated as a maximum or minimum, as appropriate:
 - i. “Protein” is minimum percentage of crude protein;
 - ii. “Fat” is minimum percentage of crude fat;
 - iii. “Total Carbohydrate[†]” is maximum percentage equal to $[100 - (\text{Crude Protein} + \text{Crude Fat} + \text{Moisture} + \text{Ash})]$;
 - iv. “Dietary Fiber” is maximum percentage of total dietary fiber. The dietary fiber guarantee shall be indented to reflect that it is a component of the total carbohydrate guarantee on the line above;
 - v. “Moisture” is maximum percentage of moisture; and
 - vi. Maximum percentage of crude fat (“Fat”) shall be listed between the minimum percentage of crude fat and the maximum percentage “Total Carbohydrate” if required by Regulation PF9;
 - vii. Additional required or voluntary guarantees shall follow moisture or ash, if listed.
 - B. When “Ash” is listed, it shall be guaranteed as a maximum percentage and shall immediately follow moisture.

- C. When listed on the label of a dog or cat food product, guarantees for “Dietary Starch” and “Sugars” shall be stated as maximum guaranteed amounts. Neither guaranteed amount shall be listed without the other. The guaranteed amount for dietary starch shall follow dietary fiber with the same indentation. The guaranteed amount for sugars shall follow dietary starch with the same indentation.
- D. The “†calculated value” shall appear immediately after the last guarantee below a bold line.
- E. Other additional required or voluntary guarantees shall appear in accordance with the following:
 - i. Guarantees for nutrients are in the same order and units of the nutrients in the AAFCO Dog (or Cat) Food Nutrient Profiles following ash, if also listed, or moisture, if ash is not listed.
 - ii. Guarantees for substances not listed in the AAFCO Dog (or Cat) Food Nutrient Profiles, or not otherwise provided for in these Regulations, shall immediately follow the listing of the recognized nutrients and be accompanied by an asterisk.
 - aa. For any such guarantees, a hairline shall be centered between the last and the next line of text;
 - bb. The disclaimer “*not recognized as an essential nutrient by the AAFCO Dog [or Cat] Food Nutrient Profiles” shall appear immediately after “†calculated value”.
- F. The statement of nutritional adequacy shall appear immediately below the bold line separating it from the disclaimers which follow the guarantees:
 - i. A statement that the dog or cat food meets the requirements of one or more of the recognized categories of nutritional adequacy: gestation/lactation, growth, maintenance, and all life stages. It shall be stated verbatim as one of the following:
 - aa. “(Name of product) is formulated to meet the nutritional levels established by the AAFCO Dog (or Cat) Food Nutrient Profiles for ____.” (Blank is to be completed by using the stage or stages of the pet’s life, such as gestation/lactation, growth, maintenance, or the words “All Life Stages”.) For a dog food, when the blank includes the words “Growth” or “All Life Stages,” one of the following phrases must also be added verbatim to the end of the claim:
 - “including growth of large size dogs (70 lb. or more as an adult)” if the product has been formulated to meet the levels of nutrients specifically referenced in the Dog Food Nutrient Profiles as being applicable to large size growing dogs.
 - “except for growth of large size dogs (70 lb. or more as an adult)” if the product has not been formulated to meet the levels of nutrients specifically referenced in the Dog Food Nutrient Profiles as being applicable to large size growing dogs; or
 - bb. “Animal feeding tests using AAFCO procedures substantiate that (Name of Product) provides complete and balanced nutrition for ____.” (Blank is to be completed by using the stage or stages of the pet’s life tested, such as, gestation/lactation, growth, maintenance, or the words “All Life

Stages”); or

- cc. “(Name of Product) provides complete and balanced nutrition for (Blank is to be completed by using the stage or stages of the pet’s life, such as gestation, lactation, growth, maintenance, or the words “All Life Stages”) and is comparable in nutritional adequacy to a product which has been substantiated using AAFCO feeding tests.”
 - ii. A nutritional or dietary statement for purposes other than those listed in Regulation PF4(b) or (c) if the statement is scientifically substantiated; or
 - iii. The statement: “This product is intended for intermittent or supplemental feeding only,” if a product does not meet the requirements of Regulation PF4(b) or (c) or any other special nutritional or dietary need and so is suitable only for limited or intermittent or supplementary feeding.
- (b) **Specialty Pet Nutrition Facts** shall be displayed in a prominent place on the label of all specialty pet foods (including treats, food supplements, veterinary diets, and food mixers), but not necessarily on the principal display panel. The information shall be set off in a box by use of hairlines and shall be all black or one-color type, printed on a white or other neutral contrasting background so as to be clearly visible under the heading “Specialty Pet Nutrition Facts” that is centered in the top row of the box and twice the size of all other text in the box. A hairline rule that is centered between the lines of text shall separate “Specialty Pet Nutrition Facts” from the next line of text. The box contains the following required elements with all text the same size and style in the following order:
- (1) The stated whole familiar household unit (e.g., can, measuring cup, treat, or piece), consistent with the feeding directions, and its weight in grams shall be right justified. This is set off by a bold line centered between this and the next line of text.
 - (2) The nutrient guarantees shall appear under the headers “Nutrients” that is left justified to the edge of the box, “Guaranteed” that is right justified to a vertical hairline that runs from this line of text to the last guaranteed nutrient values, and “per [familiar household unit]” that is right justified to the edge of the box. The amount “per [familiar household unit]” for each nutrient is determined by multiplying the guaranteed amount (concentration) by the number of grams in the familiar household unit and shall include the resultant unit of such amount (e.g., grams, milligrams, or international units). The guarantees shall be listed in the following order with a hairline centered between each line of text:
 - A. A specialty pet food label shall list the following required guaranteed amounts, stated as a maximum or minimum, as appropriate:
 - i. “Protein” is minimum percentage of crude protein;
 - ii. “Fat” is minimum percentage of crude fat;
 - iii. “Total Carbohydrate[†]” is maximum percentage equal to $[100 - (\text{Crude Protein} + \text{Crude Fat} + \text{Moisture} + \text{Ash})]$;
 - iv. “Dietary Fiber” is maximum percentage of total dietary fiber. The dietary fiber guarantee shall be indented to reflect that it is a component of the total carbohydrate guarantee on the line above; and
 - v. “Moisture” is maximum percentage of moisture;
 - vi. Additional required or voluntary guarantees shall follow moisture or ash, if listed.

- B. When “Ash” is listed, it shall be guaranteed as a maximum percentage and shall immediately follow moisture.
- C. When listed on the label of a specialty pet food product, guarantees for “Dietary Starch” and “Sugars” shall be stated as maximum guaranteed amounts. Neither guaranteed amount shall be listed without the other. The guaranteed amount for dietary starch shall follow dietary fiber with the same indentation. The guaranteed amount for sugars shall follow dietary starch with the same indentation.
- D. The “†calculated value” shall appear immediately after the last guarantee below a bold line.
- E. Other additional required or voluntary guarantees shall appear in accordance with the following:
 - i. These guarantees shall follow ash, if also listed, or moisture, if ash is not listed;
 - ii. Guarantees for nutrients are in the same order and units of the nutrients in an AAFCO-recognized nutrient profile for the intended animal species; however, if no species-specific AAFCO-recognized nutrient profile is available, the order and units shall follow the same order and units of nutrients in the AAFCO Cat Food Nutrient Profile;
 - iii. For those specialty pet species with an AAFCO-recognized nutrient profile for the intended animal species, guarantees for substances not listed in that profile, or not otherwise provided for in these Regulations, shall immediately follow the listing of the recognized nutrients and be accompanied by an asterisk.
 - aa. For any such guarantees, a hairline shall be centered between the last and the next line of text;
 - bb. The disclaimer “*not recognized as an essential nutrient by the ____.” (Blank is to be completed by listing the specific AAFCO-recognized nutrient profile) shall appear immediately after the last such guaranteed amounts.
 - cc. No such disclaimer shall appear unless an AAFCO-recognized nutrient profile is available for the specific species of specialty pet.
- F. The statement of nutritional adequacy shall appear immediately below the bold line separating it from the guarantees as one of the following:
 - i. For daily foods for those specialty pet species where no recognized nutritional authority exists, the statement: “This product is intended to be a daily food.”
 - ii. For all other specialty pet foods:
 - aa. A statement substantiating that the specialty pet food meets the requirements for nutritional adequacy in Regulation PF4(b) or (c) by an AAFCO-recognized nutritional authority. It shall be stated verbatim as the following: “(Name of product) is formulated to meet the nutritional levels established by [the AAFCO-recognized authority] for ____.” (Blank is to be completed by stating the species and the stage or stages of the specialty pet’s life.);
 - bb. A nutritional or dietary claim for purposes other than those listed in Regulation PF4(b) or (c) if the claim is scientifically substantiated; or
 - cc. The statement: “This product is intended for intermittent or supplemental feeding only,” if a product is suitable only for limited or intermittent or

supplementary feeding.

- (c) The Pet Nutrition Facts or Specialty Pet Nutrition Facts box of a pet food or a specialty pet food which is formulated as and represented to be a food supplement shall include all of the information required in Regulation PF5(a) or PF5(b) except that guarantees shall only be displayed on a per feeding unit (e.g., tablets, capsules, granules, or liquids) basis:
 - (1) For a food supplement that is intended to be a source of nutrients, guarantees shall appear for all nutrients that the product is intended to provide under the headers “Nutrients” that is left justified to the edge of the box and “per [feeding unit]” that is right justified to the edge of the box:
 - A. For nutrients with an established requirement by an AAFCO-recognized nutrient profile, minimum guarantees shall be declared in the same order and units (i.e., g, mg, or IU) specified in the AAFCO-recognized nutrient profile for the intended species; or
 - B. When no species-specific nutrient profile has been recognized by AAFCO, minimum guarantees shall be declared in the same order and units (i.e., g, mg, or IU) specified in the AAFCO Cat Food Nutrient Profiles; and
 - C. Guarantees for substances not listed in an AAFCO-recognized nutrient profile for the intended animal species, or not otherwise provided for in these Regulations, shall immediately follow the listing of the recognized nutrients and be accompanied by an asterisk.
 - i. For any such guarantees, a hairline shall be centered between the last and the next line of text;
 - ii. The disclaimer “*not recognized as an essential nutrient by the ____.” (Blank is to be completed by listing the specific AAFCO-recognized nutrient profile) shall appear immediately after the last such guaranteed amounts. No such disclaimer shall appear unless an AAFCO-recognized nutrient profile is available for the specific species of specialty pet.
 - (2) For a food supplement that is intended to supply microorganisms and/or enzymes, guarantees shall be declared as stipulated in Model Regulations 4(g) and/or 4(h) on a per feeding unit (e.g., tablets, capsules, granules, or liquids) basis. The enzyme activity unit meaning should follow the disclaimer within the box.
- (d) The sliding scale method of expressing a guaranteed amount on a pet food or specialty pet food label (for example, “Protein 15–18% Min”) is prohibited.
- (e) Protein, fat, calculated total carbohydrate, or dietary fiber are not required when the pet food or specialty pet food is intended for purposes other than to furnish these substances or they are of minor significance relative to the primary purpose of the product, such as a mineral or vitamin supplement.
- (f) For small packages with a total printable area of more than 12 square inches and less than or equal to 40 square inches, all information required in Regulation PF5(a), (b), or (c) shall appear, but may appear in a linear format. This information shall appear in one place without other intervening material. In the linear format, the required information shall:
 - (1) Appear in the same order as required by Regulation PF5(a), (b), or (c) but without the formatting described;
 - (2) Text shall be all black or one-color type and all text shall be the same size and style, except that the heading “Pet Nutrition Facts” or “Specialty Pet Nutrition Facts” shall

be bolded;

- (3) The text shall be sufficiently large so as to be conspicuous and must not be smaller than:

Total Printable Area	Minimum Type Size
>12 – ≤25 in. ²	1/8 in.
>25 – ≤40 in. ²	3/16 in.

- (4) The guaranteed amount shall appear immediately after the amount “per [familiar household unit]” for each nutrient with the guaranteed amount enclosed in parentheses and all units clearly identified;
- (5) The following abbreviations may be used: Total Carbohydrate as “Carb+,” Dietary Fiber as “Fiber”.
- (g) For very small packages with a total printable area of less than or equal to 12 square inches, the information required elsewhere in Regulation PF5 is not required to appear on the label. However, all information specified elsewhere in Regulation PF5 for the particular product type shall be determined and shall be submitted to the [regulatory authority] upon request. The following limited information is required to appear on the label:
- (1) This information shall appear in one place without other intervening material;
 - (2) Text shall be all black or one-color type and all text shall be the same size and style, except that the heading “Nutrition Facts” shall be bolded;
 - (3) The text shall be sufficiently large so as to be conspicuous and must not be smaller than 1/16 inch;
 - (4) For pet foods, only total calories are required and shall be stated as:
 - A. “Cal (calc): [#]” when the Calorie content is determined in accordance with Regulation PF9(a)(1); or
 - B. “Cal (fed): [#]” when the Calorie content is determined in accordance with Regulation PF9(a)(2).
 - (5) Guaranteed amounts shall be stated in weight per entire contents (e.g., grams per pouch). The following required guaranteed amounts stated as a maximum or minimum, as appropriate:
 - A. “Protein” is crude protein;
 - B. “Fat” is crude fat;
 - C. “Carb” is calculated from [100 – (% Crude Protein + % Crude Fat + % Moisture + % Ash)];
 - D. “Fiber” is total dietary fiber;
 - E. “Moisture” is moisture; and
 - F. Additional required or voluntary guarantees shall follow moisture or ash, if listed, and shall comply with the requirements for such guarantees in Regulation PF5(a)(3) or PF5(b)(2), as appropriate, except that they shall be stated in only in weight per entire contents.

Regulation PF6. Ingredients

- (a) Each ingredient of a pet food or specialty pet food shall be listed in the ingredient statement as follows:
- (1) The names of all ingredients in the ingredient statement shall be shown in letters or

- type of the same size, style, and color, except where the defined name of the ingredient includes genus and species (e.g., microorganisms) which may be shown in italics;
- (2) The ingredients shall be listed in descending order by their predominance by weight in non-quantitative terms, except if the ingredient is a vitamin and/or mineral premix, the premix may be declared in order of predominance by the name “vitamins” or “minerals,” as appropriate, followed by a parenthetical listing of all the vitamins and/or minerals in the premix, each in their order of predominance by weight as listed on the ingredient statement of the premix label;
 - (3) Ingredients shall be listed and identified by the name established in the AAFCO Official Common or Usual Names and Definitions of Feed Ingredients, except any ingredient for which no AAFCO ingredient name exists shall be identified by the common or usual name;
 - (4) Any ingredient suitable for use in pet food or specialty pet food for which there is a codified standard of identity in Title 9 or 21 of the Code of Federal Regulations shall be declared in accordance with the applicable regulation, which includes the name of the standardized food followed by a parenthetical listing of its ingredients, if necessary, as provided in the regulation;
 - (5) The ingredients “meat,” “poultry,” “poultry by-products,” or “meat by-products” shall be qualified to designate the animal from which the ingredients are derived unless the meat or meat by-products are derived from cattle, swine, sheep, goats, or any combination thereof or the poultry or poultry meal are derived from chickens, turkeys, ducks, geese, guineas, ratites, or squabs, or any combination thereof. For example, ingredients derived from deer shall be listed as “venison” or “venison by-products;”
 - (6) For ingredients consisting of fish, “fish meal,” or “fish by-products,” the name of the ingredient may include “fish” without further specification of the type of the fish or if it bears a name descriptive of its kind (e.g., “ocean whitefish” or by using the acceptable market name(s) or common name (but not any vernacular or slang names) of the individual fish species in the ingredient as established by the FDA Seafood List), it must correspond thereto; and
 - (7) For purposes of ingredient labeling of pet food or specialty pet food, the ingredient “sugar” shall refer to sucrose, which is obtained from sugar cane or sugar beets in accordance with the provisions in Title 21 of the Code of Federal Regulations. For all other labeling purposes outside the ingredient list, the term “sugar” shall be synonymous with “sugars” as defined in the Official Feed Terms.
- (b) Brand or trade names shall not be used in the ingredient statement.
 - (c) Reference to quality or grade of an ingredient shall not appear in the ingredient statement.
 - (d) If properly used as specified by the USDA National Organic Program (7 CFR Part 205), the term “organic” does not apply to Regulation PF5(c).
 - (e) A reference to the nature, form, or other attribute of an ingredient shall be allowed in the ingredient statement when that attribute imparts a distinctive characteristic to the pet food or specialty pet food.
 - (f) Any reference to the percentage of an ingredient or combination of ingredients, by symbol or word, in the brand or product name or elsewhere on a pet food or specialty pet food label, shall be based in relation to the total weight of all ingredients in the product.

- (1) The names of the ingredient(s) shall appear in order of predominance by weight in the product, provided that names of flavors due to their varying intensity can be in any order.
- (2) Where water sufficient for processing is excluded from the declared percentage, the exclusion of water shall be indicated in words juxtaposed to, the same style and color print, and at least one-half the print size of the stated percentage (e.g., “95% beef exclusive of water” or “95 percent chicken and liver exclusive of water”).

Regulation PF7. Drugs and Pet Food Additives

- (a) An artificial color may be used in a pet food or specialty pet food only if it has been shown to be harmless to pets or specialty pets. The permanent or provisional listing of an artificial color in the United States Food and Drug regulations as safe for use, together with the conditions, limitations, and tolerances, if any, incorporated therein, shall be deemed to be satisfactory evidence that the color is, when used pursuant to such regulations, harmless to pets or specialty pets.
- (b) Evidence may be required to prove the safety and efficacy or utility of a pet food or specialty pet food which contains additives or drugs, when used according to directions furnished on the label. Satisfactory evidence of the safety and efficacy of a pet food or specialty pet food may be established:
 - (1) When the pet food or specialty pet food contains such additives, the use of which conforms to the requirements of the applicable regulation in the Code of Federal Regulations, Title 21, or which are “prior sanctioned” or “informal review sanctioned” or “Generally Recognized as Safe” for such use; or
 - (2) When the pet food or specialty pet food itself is a drug or contains a drug as defined in Section 3 (g) of this Act and is “generally recognized as safe and effective” for the labeled use or is marketed subject to an application approved by the Food and Drug Administration under Title 21, U.S.C. 360(b).
- (c) When a drug is included in a pet food or specialty pet food, the format required by Model Regulation 3(a)(2) for labeling medicated feeds shall be used.

Regulation PF8. Feeding Directions

- (a) All pet foods and specialty pet foods shall bear feeding directions consistent with the intended use statement on the principal display panel.
- (b) Dog or cat food, including treats and food mixers, labeled as complete and balanced for any or all life stages as provided in Regulation PF4(b) or PF4(c), except those pet foods labeled in accordance with Regulation PF4(d), shall list feeding directions on the product label. These directions shall be expressed in common terms and shall appear prominently on the label. Feeding directions shall, at a minimum, include the amount of familiar household unit of product per weight of dog (or cat). The frequency of feeding shall also be specified.
- (c) Specialty pet food, including treats and food mixers, labeled as complete and balanced for any or all life stages as provided in Regulation PF4(b) or PF4(c) or as a daily food, shall list feeding directions on the product label. These feeding directions shall be adequate to meet the feeding requirements of the intended species of specialty pet. These directions shall be expressed in common terms and shall appear prominently on the label. The frequency of feeding shall also be specified.

- (d) Food supplements shall list feeding directions on the product label that, at minimum, include the quantity of feeding unit (e.g., tablets, capsules, granules, or liquids) per weight of animal. The frequency of feeding shall also be specified.
- (e) When a pet food or specialty pet food is intended for use by or under the supervision or direction of a veterinarian, the statement: “Use only as directed by your veterinarian” may be used in lieu of feeding directions.

Regulation PF9. Determination of Calorie Content for Dog and Cat Foods

- (a) The statement shall be determined in terms of metabolizable energy (ME) on an “as fed” moisture basis by one of the following methods then converted to Calories (kcal) per the familiar household unit (i.e., can, measuring cup, treat, or piece):
 - (1) By calculation (indicated with a “+” in the Pet Nutrition Facts) using the following “Modified Atwater” formula: $ME \text{ (kcal/kg)} = 10[(3.5 \times CP) + (8.5 \times CF) + (3.5 \times NFE)]$, where ME = metabolizable energy, CP = % crude protein “as fed,” CF = % crude fat “as fed,” NFE = % nitrogen-free extract (carbohydrate) “as fed,” and the percentages of CP and CF are the average values of these components in the product as determined by sound scientific methods, such as, but not limited to scientifically accurate calculations made from the formula of the product or upon chemical analysis of the product. The NFE is calculated as the difference between 100 and the sum of CP, CF, and the percentages of crude fiber, moisture, and ash (determined in the same manner as CP and CF); or
 - (2) In accordance with testing procedures determined by AAFCO (indicated as “(fed)” in the Pet Nutrition Facts).
- (b) An affidavit shall be provided upon the request of [regulatory authority], substantiating that the Calorie content was determined by:
 - (1) Regulation PF9(a)(1) in which case the summary data used in the calculation shall be included in the affidavit; or
 - (2) Regulation PF9(a)(2) in which case the summary data used in the determination of Calorie content shall accompany the affidavit.
- (c) The Calories from protein, fat, and carbohydrate as required in the Pet Nutrition Facts are determined using the following calculation, then converted to Calories (kcal) per the familiar household unit (i.e., can, measuring cup, treat, or piece):
 - (1) Protein: $ME \text{ (kcal/kg)} = 10(3.5 \times CP)$, where ME = metabolizable energy, CP = % crude protein “as fed” and the percentage of CP is the average value in the product as determined by sound scientific methods, such as, but not limited to scientifically accurate calculations made from the formula of the product or upon chemical analysis of the product.
 - (2) Fat: $ME \text{ (kcal/kg)} = 10(8.5 \times CF)$, where ME = metabolizable energy, CF = % crude fat “as fed” and the percentage of CF is the average value in the product as determined by sound scientific methods, such as, but not limited to scientifically accurate calculations made from the formula of the product or upon chemical analysis of the product.
 - (3) Carbohydrate: $ME \text{ (kcal/kg)} = 10(3.5 \times NFE)$, where ME = metabolizable energy, NFE is calculated as the difference between 100 and the sum of CP, CF, and the percentages of crude fiber, moisture, and ash; CP = % crude protein “as fed,” CF = %

crude fat “as fed” and the percentages are the average values of these components in the product as determined by sound scientific methods, such as, but not limited to scientifically accurate calculations made from the formula of the product or upon chemical analysis of the product.

- (d) Comparative claims shall not be false, misleading, or given undue emphasis and shall be based on the same methodology for the products compared.

Regulation PF10. Descriptive Terms

(a) **Calorie Terms**

(1) “Light”

- A. A dog food product which bears on its label the terms “light,” “lite,” “low Calorie,” or words of similar designation shall:
- i. Contain no more than 3,100 kcal ME/kg for products containing less than 20% moisture, no more than 2,500 kcal ME/kg for products containing 20% or more but less than 65% moisture, and no more than 900 kcal ME/kg for products containing 65% or more moisture; and
 - ii. Include on the label feeding directions which reflect a reduction in Calorie intake consistent with the intended use.
- B. A cat food product which bears on its label the terms “light,” “lite,” “low Calorie,” or words of similar designation shall:
- i. Contain no more than 3,250 kcal ME/kg for products containing less than 20% moisture, no more than 2,650 kcal ME/kg for products containing 20% or more but less than 65% moisture, and no more than 950 kcal ME/kg for products containing 65% or more moisture; and
 - ii. Include on the label feeding directions which reflect a reduction in Calorie intake consistent with the intended use.

(2) “Less” or “Reduced Calories”

- A. A dog or cat food product which bears on its label a claim of “less Calories,” “reduced Calories,” or words of similar designation shall include on the label:
- i. The name of the product of comparison and the percentage of Calorie reduction (expressed on an equal weight basis) explicitly stated and juxtaposed with the largest or most prominent use of the claim on each panel of the label on which the term appears; and
 - ii. The comparative statement printed in type of the same color and style and at least one-half the type size used in the claim; and
 - iii. Feeding directions which reflect a reduction in Calories compared to feeding directions for the product of comparison.
- B. A comparison between products in different categories of moisture content (i.e., less than 20%, 20% or more but less than 65%, 65% or more) is misleading.

(b) **Fat Terms**

(1) “Lean”

- A. A dog food product which bears on its label the terms “lean,” “low fat,” or words of similar designation shall:
- i. Contain no more than 9% fat for products containing less than 20% moisture, no more than 7% fat for products containing 20% or more but less than 65% moisture, and no more than 4% fat for products containing 65% or more

- moisture;
- ii. Include on the product label in the nutrient guarantees:
 - aa. A maximum fat guarantee immediately following the minimum fat guarantee in addition to the mandatory information as specified in Regulation PF5(a)(3); and
 - bb. A maximum fat guarantee which is no more than 9% fat for products containing less than 20% moisture, no more than 7% fat for products containing 20% or more but less than 65% moisture, and no more than 4% fat for products containing 65% or more moisture.
- B. A cat food product which bears on its label the terms “lean,” “low fat,” or words of similar designation shall:
 - i. Contain a maximum percentage of fat which is no more than 10% fat for products containing less than 20% moisture, no more than 8% fat for products containing 20% or more but less than 65% moisture, and no more than 5% fat for products containing 65% or more moisture; and
 - ii. Include on the product label in the nutrient guarantees:
 - aa. A maximum fat guarantee immediately following the minimum fat guarantee in addition to the mandatory information as specified in Regulation PF5(a)(3); and
 - bb. A maximum fat guarantee which is no more than 10% fat for products containing less than 20% moisture, no more than 8% fat for products containing 20% or more but less than 65% moisture, and no more than 5% fat for products containing 65% or more moisture.
- (2) “Less” or “Reduced Fat”
 - A. A dog or cat food product which bears on its label a claim of “less fat,” “reduced fat,” or words of similar designation shall include on the label:
 - i. The name of the product of comparison and the percentage of fat reduction (expressed on an equal weight basis) explicitly stated and juxtaposed with the largest or most prominent use of the claim on each panel of the label on which the term appears; and
 - ii. The comparative statement printed in type of the same color and style and at least one-half the type size used in the claim; and
 - iii. A maximum fat guarantee immediately following the minimum fat guarantee in addition to the mandatory information as specified in Regulation PF5(a)(3).
 - B. A comparison on the label between products in different categories of moisture content (i.e., less than 20%, 20% or more but less than 65%, 65% or more) is misleading.
- (c) Carbohydrate Terms
 - (1) “Low” Carbohydrate, Dietary Starch, and Sugars Claims. A claim of “low carbohydrates,” “low dietary starch,” “low sugars” (or a combination thereof) is not allowed.
 - (2) “Less” or “Reduced” Carbohydrates, Dietary Starch, and Sugars claims.
 - A. A dog or cat food product that bears on its label a claim of “less__” or “reduced__” (blank is to be completed by using “carbohydrates,” “dietary starch,” or “sugars”), or words of similar designation, shall include on the label:
 - i. The name of the product of comparison and the percentage of reduction in

total dietary starch plus sugars (expressed on an equal weight basis) explicitly stated and juxtaposed with the largest or most prominent use of the claim on each panel of the label on which the term appears; and

- ii. The comparative statement printed in type of the same color and style and not less than one-half the size used in the claim; and
 - iii. Maximum guarantees for dietary starch and sugars as stated in Model Regulation PF5(a)(3).
- B. A comparison between products in different categories of moisture content (i.e., less than 20%, 20% or more but less than 65%, 65% or more) is misleading.

Regulation PF11. Manufacturer or Distributor; Name and Address

- (a) The label of a pet food or specialty pet food shall specify the business or corporate name and address of the manufacturer or distributor. This information shall appear under the header “Manufactured for _____,” “Distributed by _____,” or any other wording that expresses the facts, if the business whose name appears on the label is not the manufacturer. The statement of the place of business shall include the street address, city, state, and zip code; however, the street address may be omitted if such street address is shown in a readily accessible, widely published, and publicly available resource, including but not limited to a printed directory, electronic database, or website.
- (b) When a person manufactures, packs, or distributes a pet food or specialty pet food in a place other than the principal place of business, the label may state the principal place of business in lieu of the actual place where each package of such pet food or specialty pet food was manufactured or packaged or from where each package is to be distributed.

Regulation PF12. Handling and Storage Instructions

- (a) A product which bears handling and storage instructions shall display such instructions under the bolded header “Handling and Storage Instructions:” that is separate and distinct from any feeding directions. A header is not required for small packages with a total printable area less than 40 square inches. If any graphics are used to support handling and storage instructions, the following graphics (and only the following graphics) may be included, with the handling and storage instructions section, as applicable. The graphics with accompanying text shall be obtained from the AAFCO website.



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- (b) The handling and storage instructions, if present, shall be displayed in a conspicuous manner so to render them likely to be read under typical conditions of use. Any use of the handling and storage instructions graphics shall be no smaller than:

Panel Size	Minimum Graphic Size (top of circle to bottom of text)
$\leq 40 \text{ in.}^2$	1/2 in.
$>40 - \leq 100 \text{ in.}^2$	1 in.
$>100 - \leq 400 \text{ in.}^2$	1 3/4 in.
$>400 \text{ in.}^2$	2 in.

Basic Pet Nutrition Facts Box Examples

(Reference Key on last page)

Pet Nutrition Facts		
(A) = (B) g		
Calories per (A) (C) (D) From: Protein (E), Fat (F), Carbohydrate (G)		
Nutrients	Guaranteed	per (A)
Protein (min)	(Q) %	(S) g
Fat (min)	(Q) %	(S) g
Total Carbohydrate [†] (max)	(Q) %	(S) g
Dietary Fiber (max)	(Q) %	(S) g
Moisture (max)	(Q) %	(S) g
[†] Calculated value		
(Y) [Nutritional Adequacy Statement as required by PF 4]		

Small:

Pet Nutrition Facts per (A): Calories[†] (C) (D), From Protein (E) Fat (F) Carbs (G) Protein (min) (S) g ((Q) %), Fat (min) (S) g ((Q) %), Carb[†] (max) (S) ((Q)), Fiber (max) _____g ((S) %), Moisture (max) g ((S) %). [†] (Q) Calculated value. [Nutri (Y) nal Adequacy Statement as defined by PF 4].

Very Small:

Nutrition Facts Cal (Z) (D) ; Protein (min) (S), Fat (min) (S) Carb (max) (S) Fiber (max) g, Moisture (max) g. (S)

Expanded Pet Nutrition Facts Box Examples

(Reference Key on last page)

Pet Nutrition Facts		
A = B g		
Calories per A C : D		
From: Protein E , Fat F , Carbohydrate G		
Nutrients	Guaranteed	per A
Protein (min)	Q %	S g
Fat (min)	Q %	S g
Fat (max) H	Q %	S g
Total Carbohydrates [†] (max)	Q %	S g
Dietary Fiber (max)	Q %	S g
Dietary Starch (max) J	Q %	S g
Sugars (max)	Q %	S g
Moisture (max)	Q %	S g
Ash (max) K	Q %	S g
L (min or max)	T	U
M (min or max)	V	W
[†] Calculated value N *Not recognized as an essential nutrient by the AAFCO (P) Food Nutrient Profiles. X [Explanation of enzyme units]		
Y [Nutritional Adequacy Statement as required by PF 4]		

Small:

Pet Nutrition Facts per A : Calories C D From Protein E Fat F Carbs G Protein (min) S g (Q %), Fat (min) S g (Q %), Fat (max) S g (Q %), Carb (max) S g (Q %), Fiber (max) S g (Q %), Dietary Starch (max) S g (Q %), Sugars (max) S g (Q %), Moisture (max) S g (Q %), Ash S g (Q %), L U T, M W Y[†] Calculated value.
 *Not recognized as an essential nutrient by the AAFCO Food Nutrient Profiles.
 X [Explanation of enzyme units] Y [Nutritional Adequacy Statement as defined by PF 4].

Very Small:

Nutrition Facts Cal Z D ; Protein (min) S g, Fat (min) S g, Carb (max) S g, Fiber (max) g, Moisture (max) g. S

Basic Specialty Pet Nutrition Facts Box Examples

(Reference Key on last page)

Specialty Pet Nutrition Facts		
	A	B
Nutrients	Guaranteed	per A
Protein (min)	Q	S
Fat (min)	Q	S
Total Carbohydrates [†] (max)	Q	S
Dietary Fiber (max)	Q	S
Moisture (max)	Q	S
† Calculated value		
Y [Nutritional Adequacy Statement as defined by PF4].		

Small:

Specialty Pet Nutrition Facts per A: Protein (min) S; (Q%), Fat (min) S Q Carb[†] (max) g (S%), Qer (max) g (S%), Moisture (max) g (S). † Calculated value. [Nutritional Adequacy Statement as defined by PF4].

Very Small:

Nutrition Facts: Protein (min) Sg, Fat (min) S Carb (max) S Fiber (max) S Moisture (max) g. S

Basic Pet Nutrition Supplement Facts Box Examples

Pet Nutrition Facts	
1 soft gel = 5 g	
Calories per soft gel [†] : 40 From: Protein 0, Fat 40, Carbohydrate 0	
Nutrients	per soft gel
Fat (min)	4.9 g
Moisture (max)	0.1 g
Eicosapentaenoic Acid (EPA) (min)	900 mg
Docosahexaenoic Acid (DHA) (min)	600 mg
Vitamin A (min)	480 IU
Vitamin D3 (min)	120 IU
Vitamin E (min)	5 IU
[†] Calculated value	
This product is intended for intermittent or supplemental feeding only.	

Small:

Pet Nutrition Facts per 1 soft gel: Calories[†] 40, From Protein 0, Fat 40, Carbs 0; Fat (min) 4.9 g, Moisture (max) 0.1 g, Eicosapentaenoic Acid (EPA) (min) 900 mg, Docosahexaenoic Acid (DHA) (min) 600 mg, Vitamin A (min) 480 IU, Vitamin D3 (min) 120 IU, Vitamin E (min) 5 IU. This product is intended for intermittent or supplemental feeding only.[†] Calculated value

Very Small:

Nutrition Facts: Cal (calc) 40; Fat (min) 4.9 g, Moisture (max) 0.1 g, Eicosapentaenoic Acid (EPA) (min) 900 mg, Docosahexaenoic Acid (DHA) (min) 600 mg, Vitamin A (min) 480 IU, Vitamin D3 (min) 120 IU, Vitamin E (min) 5 IU.

Key for Generic Pet Nutrition Facts Box.

Note: Letters below correspond to white letters in black circles conveniently located on the facts box examples above.

- (A) Familiar common measurement, for example 1 can, 1 tray, 1 pouch, 1 unit of product (treat, piece, etc.), 1 cup, 1 teaspoon. If unit is 1 cup, the explanation "1 cup (8 oz standard measuring cup)" is required.
- (B) Weight in grams of familiar common measurement cited in A. In cases of non-uniform products that are reported per piece, indicate the average weight and add "(avg)" after the weight.
- (C) Insert qualifier to disclose if the calorie content is calculated or fed. When calculation is used, inserting the superscript dagger referencing "+ Calculated value" in the table is sufficient (Calories per cup[†]). In small packages, use superscript dagger to designate calculated value. When the value is based on feeding trials, "(fed)" must be included in this line.
- (D) Insert value per PF5(a)(2)
- (E) Insert number of kilocalories contributed by protein as determined by PF9(c)(1)
- (F) Insert number of kilocalories contributed by fat as determined by PF9(c)(2)
- (G) Insert number of kilocalories contributed by carbohydrate as determined by PF9(c)(3)
- (H) Insert a second row for Fat, with guaranteed maximum amount if required by Regulation PF10.
- (J) Insert rows following Dietary Fiber when a guaranteed amount for Dietary Starch and Sugars is provided.
- (K) Insert a row following moisture when a guaranteed amount for Ash is provided.
- (L) Insert row(s) for other required or voluntary guarantees listed as essential nutrients under a bolded line per PF5(a)(3).
- (M) Insert rows for voluntary guarantees for non-essential nutrients per PF5(a)(3).
- (N) This disclaimer is only required when guaranteed amounts for non-essential nutrients are included per PF5(a)(3)(E)(ii)(ba).
- (P) Insert "Cat" or "Dog" as appropriate to intended use of product.
- (Q) Insert appropriate guaranteed amounts as specified in PF5 (a)(3)(A)(i-vii).
- (S) Insert appropriate value determined by multiplying the decimal equivalent of guaranteed amount by the value cited in A. (ie for a guaranteed amount of 23% and a weight in grams in A of 90, move the decimal on the percent value two places to the left (0.23) and multiply by the weight of the familiar common measurement (90) to get 20.7 value for S).
- (T) The guaranteed amount shall be listed according to the same units of the nutrients in the AAFCO Dog (or Cat) Food Nutrient Profiles.
- (U) Calculate value per T. Report in grams for guaranteed amounts that are percentages. When other units are used, report as appropriate (e.g., for a guaranteed amount in IU/kg report in IU, for a guaranteed amount in mg/kg report in mg, etc).
- (V) The guaranteed amount shall be reported in units consistent with intended use (e.g., percentage, mg/kg, etc.). Guarantees for microorganisms and enzymes shall be stated in the format as stipulated in model reg. 4(g) and 4(h).
- (W) Calculate value per U. Report in grams for guaranteed amounts that are percentages. When other units are used, report as appropriate (e.g., for a guaranteed amount in IU/kg report in IU, for a guaranteed amount in mg/kg report in mg, etc.).
- (X) Provide an explanation of enzyme units, if necessary.
- (Y) Insert Verbatim Nutritional Adequacy Statement required by PF4.
- (Z) For very small packages insert "Cal (calc)" or "Cal (fed)"

**Keynote Speaker Tracey Forfa,
Director, Center for Veterinary Medicine**

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Monday, July 31, 2023
10:30–11:00 AM



Tracey Forfa, J.D. has been appointed the Director for FDA’s Center for Veterinary Medicine, effective February 26, 2023. The Center regulates animal food, drugs and devices, including those intended for pets as well as the animals that produce the meat, milk and eggs that we eat.

Ms. Forfa has been with CVM since 2002 and was appointed the Deputy Center Director in 2008. She previously served as Acting Director in 2016, and again in early 2023 prior to her permanent appointment. She was also the Acting Ombudsman for CVM from 2019-2022. Prior to joining CVM, Ms. Forfa helped to support FDA’s mission in other capacities. In 1996, she joined the Office of the Chief Mediator and Ombudsman, working on product jurisdiction and external dispute resolution. She joined the agency in 1993 as a member of the regulations and policy staff at the FDA’s Center for Biologics Evaluation and Research (CBER) working on issues such as human tissue and blood banking.

Ms. Forfa earned her bachelor’s degree from the College of Wooster in Wooster, Ohio and her law degree from the University of Baltimore in Maryland. She has also completed FDA’s Executive Education Program in Regulatory Policy through the University of Maryland.

Laboratory and Panel Regulatory Discussion

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Monday, July 31, 2023
11:00–11:45 AM

Speakers

Josh Arbaugh, West Virginia Department of Agriculture
Ashlee-Rose Ferguson, Washington State Department of Agriculture
George Ferguson, North Carolina Department of Agriculture & Consumer Services
Mark LeBlanc, Office of Indiana State Chemist
Patricia Lucas, Florida Department of Agriculture & Consumer Services
Bailey Whiten, Georgia Department of Agriculture

Moderator: Austin Therrell, Executive Director, AAFCO

Notes

Current Issues and Outreach Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Monday July 31, 2023
1:15–1:45 PM EDT

Agenda

Welcome/Roll Call & Opening Remarks
Jo Lynn Otero, New Mexico Department of Agriculture

CIOC/Philosophy Workgroup Updates
Tera Keatts, Philosophy Communications

IFPT Research Presentation on African Swine Fever
Vianca Philpotts, Washington Department of Agriculture

AAFCO 101 Update and New Members
Jo Lynn Otero, New Mexico Department of Agriculture

- Workgroup Updates: Align workgroup priorities with Strategic Plan (GOAL 2) Enhance Member Support and Education Resources
Objective 2.2 – Enhance membership through recruitment, support, and sustainability.
Task 2. Stabilize committees with added participation.
Reach out to newer people to introduce them to committees and reach out post-meeting to determine if they would be willing to join any committee for participation. Assess the number of contacts made and success rate measured through new members participating on committees.
 - ▶ A letter will be sent to new attendees as a follow-up.
 - ▶ A networking session is incorporated within the Annual meeting following CIOC committee meeting. Those interested in a committee can meet the chair(s) and ask questions.Task 4. Develop and implement member toolkit and periodic newsletter.
Develop a member communication toolkit, and restart newsletter, to be sent periodically (TBD) to members and advisors, and published on the AAFCO website. Encourage members to share communication items with their leadership. Evaluate relevancy with members at least twice a year (could be discussed at Seminar). Consider whether website “hits” (open rates on email) can be measured to assess engagement with toolkit/newsletter.
 - ▶ The first quarterly newsletter went out in March.
 - ▶ New toolkit available on the AAFCO website under “Resources” tab.Task 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 that reports to ETC. Confirm members of Subcommittee complete with chairperson. Evaluate attendance and consider meeting evaluations to assess meeting relevance and success to members. Ensure timely development of meeting agendas.

CIOC, AAFCO Executive Director, with FASS support have a subcommittee that meet prior to the annual and midyear meetings to plan.

Action Items

Responsible	Item	Action	Timing / Status
CIOC	Develop messaging on impact of animal feed safety to human health with three audiences: <ul style="list-style-type: none"> • Regulatory agency leadership • Feed manufacturers including food processors • Consumers 	<ul style="list-style-type: none"> • Design a flyer that can be distributed at meetings and as a resource for State Regulatory agencies to use to educate consumers and manufacturers. • Develop a member informational platform containing guidance materials, resource links and a fact sheet to members, advisors and published on the AAFCO website. • Promote resources to ensure awareness • Work with website redesign group to create ability to evaluate/track viewing of resources to measure impact. Add pop up to ask if information was helpful (Yes/No answer). 	Prepare and provide during Midyear meeting 2024

Proficiency Testing Program Committee

2023 AAFCO Annual Meeting
 Renaissance Baltimore Harborplace Hotel
 Baltimore, Maryland
 Monday, July 31, 2023
 2:15–5:15 PM

Meeting Room TBD; Zoom connection emailed directly to registrants

Agenda

- 1) Call to Order
- 2) Review and Approval of Agenda
- 3) Introductions
- 4) Program Leadership and Administrative Updates
 - a) Introduce new QA Manager, Alexa Bombich – S. Flowers
 - b) Quality Management System Update – A. Bombich
- 5) Update on January 2023 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

- 6) PTP Budget Update – B. Snodgrass
- 7) 2023 Subscription Update – B. Snodgrass
- 8) Customer Feedback - B. Snodgrass
- 9) Laboratory Sampling Survey – N. Thiex
- 10) AV Workgroup update – S. Flowers
- 11) Other Business
 - a) Roundtable Discussion
- 12) Adjournment

Notes

Ingredient Definitions Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Monday, July 31, 2023; 2:15–3:45 PM (Part 1)
Tuesday, August 1, 2023; 9:00–10:30 AM (Part 2)

Session One Agenda

Meeting Registration Link: <https://www.aafco.org/Meetings/Annual/2023>

Roll call: Members, investigators, and presenters please arrive 10 minutes early

OP CONTENT/IDC CONSIDERATIONS

- 1) LG HEAR Meal (T71.41) to Official – (5) Falina Hutchinson
- 2) Dried _____ Fermentation Products (T36.11a) to Official – (5) Maggie Faba
- 3) New Tentative Definition (T51.17) Clam Meal – (5) Justin Hill
- 4) New Tentative Definition (T40.113) Dried Recovered Household Food – (5) David Husner
- 5) New Tentative Definition (T60.119) Dried Cricket – (5) Erin Bubb
- 6) Revise protocol for accepting GRAS once the FDA “No Questions” letter notice is published – (10) Nathan Price

The section editor recommends clarifying the section 101 header in the OP by inserting the language “AGRN’s may be presented to the IDC for inclusion in section 101 at the next scheduled IDC meeting after FDA has posted their no questions letter, without regard for the redacted notice.”

- 7) Common Food Index recommendations – (45) CFI Subcommittee
*90 Minutes

End Session One

Session Two Agenda

- 8) Common Food Index recommendations – (20) if needed, continued from Session One
- 9) Establish a workgroup to determine the feasibility of creating an exemption of the tentative status requirement for new or modified AAFCO Ingredient Definitions – (10) George Ferguson
- 10) “Fish” Definition Update – (5) Justin Hill
- 11) SUIP 6 “Spent Bleaching Clay” to Technical Additive Table update – (5) David Snell
- 12) Common Food Index – External Submission Portal update – (10) CFI Subcommittee
- 13) Review *Parking Lot – (10) Erin Bubb

(IDC Content 9:00–10:00 AM)

*60 Minutes

- 14) Speakers: Dr. Geoff Hill and Azita Sayadi from Mill – Dried Recovered Household Food

(Presentation 10:00–10:30 AM)

*30 Minutes

- 15) New Investigators Needed:
 - a) Amino Acids
 - b) Fermentation Products (Maggie Faba)
 - c) DFM (Maggie Faba)
 - d) Yeast
 - e) Additives
 - f) Special Purpose Products
 - g) Preservatives
- 16) *Parking Lot Topics
 - a) ODI Subcommittee process of building an excel file of ODI changes. **Tech Committee – George?**
 - b) ODI procedures: The procedures are in the BIN and are ready for the investigators to pilot. **Update: Investigator training for ODI?**
 - c) NANP Subcommittee report –have not met -Ashley Shaw /KC

- d) FROM PFC (draft): Vitamin common names for pet food should be addressed by IDC independent of the PFLM project. Information from the qualitative consumer research should be provided to the IDC. Work of the IDC common vitamin name workgroup should be quantitatively consumer panel tested preferably at the time as the PFLM changes- **NEED UPDATE**
 - e) Pursue formal MSBC Definition. Nothing in motion
 - f) New feed terms: Total Mixed Ration, Raw, Fresh, Pasteurized- **Ali Kashani**
 - g) MBRC will be requesting new feed terms for Ash, Acid Insoluble Ash, Air Ashed, Sulfated Ash and Rawhide (part) – **NEED UPDATE from MBRC**
 - h) Proper use of process terms. **Ali Kashani and WG to present**
 - i) Spent Ball Clay Workgroup
 - j) Next IDC speaker/presenter? Suggestions: “Pre, Pro and Postbiotics”
- 17) Next Meeting: Virtual- October(?) 2023

Speaker Biographies

Mill is the first complete, tech-enabled food-recycling service for the home that transforms kitchen scraps into food for chickens. Mill makes it easy for people to keep food out of landfills and take climate action at home.

Mill customers and their kitchens benefit from a smart and attractive bin, which dries and grinds uneaten food in homes, locking in valuable nutrients, and turning it into what Mill calls Food Grounds (otherwise known as dried food). Periodically, customers ship Food Grounds back to Mill via USPS for conversion into a chicken feed ingredient, which keeps uneaten food out of landfills and in the food system.

According to Mill’s preliminary scoping LCA, this system can reduce a family’s emissions by approximately ½ ton CO2 per year in comparison with disposal in the landfill.

Mill is working to commercialize its finished feed ingredient, Mill Meal, under the proposed definition Dried Recovered Household Food. Mill believes this product is good for customers, the cities they live in, local chickens and farmers, the larger feed industry, and the planet.

About the speakers

Dr. Geoff Hill has made a career around resource recovery, paradigm change, and is a nationally recognized expert in food waste composting. In his role at Mill, Dr. Hill oversees the science, quality, and manufacturing processes required in the conversion of household food into a safe and nutritious chicken feed ingredient.

Azita Sayadi is a proven operations and analytics leader with a passion for driving innovation, product marketing, and operational excellence in new categories and markets. In her role at Mill, Azita is responsible for feed operations and safety as they work to recycle household food into a safe and nutritious chicken feed ingredient.

Inspection and Sampling Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Monday, July 31, 2023
3:45–4:45 PM

Agenda

3:45 **Welcome & Opening Remarks**

Committee Member & Advisors Roll Call
Chad Linton: West Virginia Department of Agriculture

3:50 **AIMS & BITS**

2023 AITS Update/BITS Schedule: Update from AITS, BITS Schedule, and potential future host cities and proposed dates
Jessica Gore: North Carolina Department of Agriculture & Consumer Services
Chad Linton: West Virginia Department of Agriculture

3:55 **Work Group Updates**

Progress from Bulk Tote Sampling Method work group
Jamie Spencer: Kansas Department of Agriculture
Bagged Probe Sampling Study – Status/Updates from KY; Committee's thoughts for future of this project.
Austin Therrell: AAFCO Executive Director
Inspector Guidance Tool for PC and cGMP inspections
Ashlee-Rose Ferguson: Washington State Department of Agriculture
Progress from AAFCO branded sampling equipment (Triers, bags, stream cutters, aseptic scoops, etc.) work group
Jamie Spencer: Kansas Department of Agriculture

4:15 **Other Topics for Discussion/New Business**

Formation of Sub-Committee to review Inspector's Manual & Survey committee training needs (biannual survey for training proposals). Potential charge to the group to begin moving forward with developing an Aseptic Sampling Training course and Chain of Custody guidance section for the AAFCO Feed Inspectors Manual
Other Training Needs: Certification of Inspectors/Programs

4:45 **Adjourn**

Technology Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Monday, July 31, 2023
3:45–4:45 PM

Agenda

Roll Call and Opening Remarks

Sarah Condra (NCDA&CS)

Welcome & Opening Remarks

George Ferguson – Committee Chair (NCDA&CS)

Call for New Business

George Ferguson – Committee Chair (NCDA&CS)

Committee Updates

Common Foods Index, SharePoint site development.

George Ferguson (NCDA&CS)

Announcement of new committee Chair

George Ferguson (NCDA&CS)

Workgroup Updates

AAFCO Collaboration Site Update

Jennifer Roland (NASDA)

Feed Labeling Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Tuesday, August 1, 2023
8:00–9:00 AM

Agenda

Introductions (5 mins)

- Roll Call of Members & Advisors

Labeling of Products Containing Microorganisms (10 mins)

OP Edits Workgroup Recommendations (15 mins)

- Feed Labeling Guide: adding model labels

Feed Labeling Workshop (5 mins)

Labeling Definition Workgroup (5 min)

- Request from MBRC to join workgroup to discuss labeling definition
- Need 2 regulations and 2 advisors

Unique Identifiers (i.e., Lot Numbers) on Feed Labels (20 mins)

- Workgroup update
- Next steps?

Adjourn

LABELING OF PRODUCTS CONTAINING MICROORGANISMS

First, need to determine if a laboratory method is available. If no method exists, then regulators can't require something else. Once there are validated methods, then can proceed with determining what should be on the label.

Recommendation: Forward to Laboratory Services Committee to inquire about a validated method to separate microorganism guarantees.

If a validated method is available, could consider the following options:

- ~~1. Remove Total Microorganism Guarantee~~
 - ~~— Require separate guarantees for each species or group of species.~~
 - ~~— Note: Could be problematic with international trade.~~
- ~~2. Individual guarantees based on label claims. For example, this product contains (species name) for the purpose of (purpose of the microorganism).~~
 - ~~— Would be for nutritional claims.~~
 - ~~— Still have total microorganism guarantee with subguarantee for the claimed strain(s).~~
3. Separate groups of guarantees based on label claims. For example, this product is formulated with probiotics and prebiotics for (state purpose of the probiotics and prebiotics).
 - If there are additional microorganisms, still have the total microorganism guarantee separately from the grouping of probiotics and prebiotics.
 - Enumerate all lactobacillus, all enterobacteria, all bacillus but not each individual species.

OP EDITS WORKGROUP RECOMMENDATIONS

Within the Feed Labeling Guide (Pages 240–252 of the 2023 OP), insert the following:

<u>Equine Mineral Supplement Feeds</u>	
<u>YOUR PASTURE HORSE MINERAL</u>	
<u>For maintenance of mature horses</u>	
<u>Guaranteed Analysis</u>	
<u>Calcium (min)</u>	<u>12.0%</u>
<u>Calcium (max)</u>	<u>14.0%</u>
<u>Phosphorus (min)</u>	<u>12.0%</u>
<u>Salt (min)</u>	<u>4.5%</u>
<u>Salt (max)</u>	<u>5.5%</u>
<u>Sodium (min)</u>	<u>1.7%</u>

<u>Sodium (max)</u>	<u>2.2%</u>
<u>Copper (min)</u>	<u>860 ppm</u>
<u>Selenium (min)</u>	<u>0.20 ppm</u>
<u>Zinc (min)</u>	<u>3400 ppm</u>
<u>Vitamin A (min)</u>	<u>80000 IU/lb.</u>

Ingredient Statement

Calcium Carbonate, Dicalcium Phosphate, Salt, Copper Sulfate, Manganous Oxide, Molasses Products, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Calcium Iodate, Vitamin A Supplement, Processed Grain By-Products, Choline Chloride, Animal Fat, Ethoxyquin (a preservative), Sodium Selenite.

Feeding Directions:

Feed free-choice at an approximate rate of 2 oz/head/day. Provide fresh, clean water.

Manufactured By:
YOUR NAME FEEDS
City, State Zip

NET Wt.: 50 lb. (22.67 kg)

Goat Complete and Supplement Feeds
YOUR GOAT FEED
For breeding does

Guaranteed Analysis

<u>Crude Protein (min)</u>	<u>15.0%</u>
<u>(This includes not more than 1.0% equivalent crude protein from non-protein nitrogen)</u>	
<u>Crude Fat (min)</u>	<u>2.0%</u>
<u>Crude Fiber (max)</u>	<u>20.0%</u>
<u>Acid Detergent Fiber (max)</u>	<u>25.6%</u>
<u>Calcium (min)</u>	<u>0.8%</u>
<u>Calcium (max)</u>	<u>1.3%</u>
<u>Phosphorus (min)</u>	<u>0.35%</u>
<u>Salt (min)</u>	<u>0.35%</u>
<u>Salt (max)</u>	<u>0.85%</u>
<u>Copper (min)</u>	<u>10 ppm</u>
<u>Copper (max)</u>	<u>20 ppm</u>
<u>Selenium (min)</u>	<u>0.30 ppm</u>
<u>Vitamin A (min)</u>	<u>7000 IU/lb.</u>

Ingredient Statement

Grain Products, Plant Protein Products, Processed Grain By-Products, Roughage Products, Ammonium Chloride, Vitamin A Supplement, Cholecalciferol (source of Vitamin D3), Choline Chloride, Biotin, Thiamine Mononitrate, Pyridoxine Hydrochloride, Vitamin E Supplement, Copper Sulfate, Folic Acid, Ethoxyquin (a preservative), Calcium Carbonate, Dicalcium Phosphate, Monocalcium Phosphate, Manganous Oxide, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Potassium Chloride, Sodium Selenite.

Feeding Directions:

Feed as the sole source of grain to breeding goats at the rate of 2 to 3 pounds per head per day. Provide ad libitum access to forage.

CAUTION: Use as directed. For ruminants (cattle, sheep and goat) only.

Manufactured By:
YOUR NAME FEEDS
City, State Zip

NET Wt.: 50 lb. (22.67 kg)

Edit Page 249 of the Feed Labeling Guide with the 2023 OP to the following:

YOUR SHEEP FEED
For breeding ewes

Guaranteed Analysis

Crude Protein (min)	15.0%
(This includes not more than 1.0% equivalent crude protein from non-protein nitrogen)	
Crude Fat (min)	2.0%
Crude Fiber (max)	20.0%
Calcium (min)	0.8%
Calcium (max)	1.3%
Phosphorus (min)	0.35%
Salt (min)	0.35%
Salt (max)	0.85%
Copper (min)	5.0 ppm
Copper (max)	10.0 ppm
Selenium (min)	0.3 ppm
Vitamin A (min)	7000 IU/lb.

Ingredient Statement

Grain Products, Plant Protein Products, Processed Grain By-Products, Roughage Products, Ammonium Chloride, Vitamin A Supplement, Cholecalciferol (source of Vitamin D3), Choline Chloride, Biotin, Thiamine Mononitrate, Pyridoxine Hydrochloride, Vitamin E Supplement, Copper Sulfate, Folic Acid, Ethoxyquin (a preservative), Calcium Carbonate, Dicalcium Phosphate, Monocalcium Phosphate, Manganous Oxide, Zinc Oxide, Ferrous Sulfate, Cobalt Carbonate, Potassium Chloride, Sodium Selenite.

Feeding Directions:

Feed as the sole source of grain to breeding ewes at the rate of 2 to 3 pounds per head per day.

CAUTION: Use as Directed. ~~For Sheep Only.~~ For ruminants (cattle, sheep, and goat) only.

Manufactured By:
YOUR NAME FEEDS
City, State Zip

NET Wt.: 50 lb. (22.67 kg)

UNIQUE IDENTIFIERS ON FEED LABELS

Recommendation #1:

Add lot identifiers definition to Model Bill Section 3. Definitions of Words and Terms

“Lot identifier” means a unique identifier, such as a run number, code, date, or other suitable identification for each batch or production run that enables the manufacturer to accurately trace the manufacturing and distribution history of a product. To facilitate tracing of packaged products, lot identifiers can be applied to the label, container, or package. For bulk products, lot identifiers can be applied to the label, invoice, or other documents accompanying the product.

Add below language to Section 5. Labeling of Model Bill

- (a) In case of a commercial feed, exempt a customer-formula feed, it shall be accompanied by a label bearing the following information:
 - (8) A lot identifier.
- (b) In the Case of a customer-formula feed, it shall be accompanied by a label, invoice, delivery slip, or other shipping document, bearing the following information:
 - (8) A lot identifier.

Add below language to Regulation 2. Label Format of Model Regulations

- (e) A lot identifier

Recommendation #2:

Move to insert Section 15. Recordkeeping Requirements in the Model Bill and move the current Sections 15–19 to follow Section 15. Recordkeeping Requirements in Sequential order

Section 15. Recordkeeping Requirements

- a) Records shall be maintained and be adequate to facilitate a recall of a specific batch or production run of commercial feed product that has been distributed.
- b) Records relating the lot identifier to the manufacture and distribution of the commercial feed product must be kept for one year after the last date of distribution.

Recommendation #3:

Move to insert Regulation 11. Recordkeeping Requirements in the Model Bill and move the current Regulation 11–13 to follow Regulation 11. Recordkeeping Requirements in Sequential order

Regulation 11. Recordkeeping Requirements for Manufacturing

- (a) For each commercial feed distributed, complete records shall be maintained in a manner that will facilitate the recall, diversion, or destruction of the commercial feed, if necessary. Such records shall be maintained for at least one years after the date of distribution by the manufacturer and shall include the following;
 - 1. Date of manufacture.
 - 2. Lot identifier.
 - 3. Date and quantity distributed.
- (b) Records required under this section shall:
 - 1. Be kept as original records, true copies, or electronic records.
 - 2. Be accurate, indelible, and legible.
 - 3. Be created concurrently with the performance of the activity documented.
 - 4. Be as detailed as necessary to history of work performed.

Laboratory Methods and Services Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Tuesday August 1, 2023
8:00 AM to 3:15 PM

All virtual attendees must register for the AAFCO Annual Conference at <https://www.aaftco.org/events/meetings/annual/2023-annual-meeting/> to gain access to this meeting

All Agenda Times—including Public Comment and Adjournment—are Subject To Change

Agenda

- 8:00 AM Welcome, Introductions, & Adoption of Agenda, Co-chairs
Review of Committee Roster and Announcements, Co-chairs
- 8:20 AM Total Dietary Fiber, Cladio Cornaggia, Neogen
- 9:20 AM FDA's Laboratory Accreditation for the Analysis of Foods (LAAF) program, Maria Keller, PhD, FDA CVM
- 10:30–10:45 AM **Coffee Break**
- 10:45–11:45 AM AAFCO LMSC Training Program Discussion and Planning, Co-chairs, committee, advisors
- 11:45–1:15 PM **LUNCH ON YOUR OWN**
- 1:15 PM Working Group Updates
- Hemp
 - Metals
 - Fat Soluble Vitamins
 - Mycotoxins
 - Moisture
 - Microbiology
 - Toxins
 - Drug Residues
 - Dietary Fiber
 - QAQC Sub-Committee
- Each group should come prepared to give a brief update.
- 2:15 PM Carbohydrate Guarantees and ME Calculations, J. Arbaugh, WV Dept. of Ag
- 3:15 PM **Adjourn (afternoon break)**

Notes

Model Bills and Regulations Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Tuesday, August 1, 2023
10:45–11:45 AM

Agenda

- 1) Welcome and Committee Member Introductions
- 2) 2023 Midyear Meeting Minutes (approved as written on 2/27), and the PFLM document review meeting (approved as written on 4/3), posted on AAFCO web-site and in the Feed BIN, included in the General Session packet
- 3) Committee/Work Group reports
 - a) “Labeling” work group update – Eric Brady
 - b) SUIP Biennial work group report (Attachment A) – Cathy Alinovi
- 4) Old Business
- 5) New Business
 - a) FLC proposed Modification of Poultry Feed Guarantees (Attachment B), Dave Dressler
 - b) Pet Food/Feed Cottage Food Exemption – Dan King
- 6) Assignments/homework for annual meeting
- 7) Adjourn

Attachment A

Scan QR code to review SUIP Workgroup Report – SUIP Review for discussion at the 2023 AAFCO Annual Meeting



Attachment B

- II. Required guarantees for Formula Poultry Feeds (Layers, Broilers, and Turkeys; including breeders)
 - a. Animal Classes
 - (1) Layers – Chickens that are grown to produce eggs for food, e.g., table eggs
 - (a) Starter/grower (laying hen replacements) – Female chickens raised from day of hatch to sexual maturity (time first egg is produced) and intended to become laying hens.
 - (b) Laying hens – From time first egg is laid throughout the time of egg production.
 - (2) Broilers – Chickens that are grown for human food.
 - (a) Starter/grower – From day of hatch to approximately 5 weeks of age.
 - (b) Finisher – From approximately 5 weeks of age to desired market weight.
 - (3) Breeding chickens
 - (a) Breeder replacement chickens – Chickens, of both sexes, raised from day of hatch to sexual maturity and intended to become broiler breeder or layer breeder chickens.
 - (b) Breeder chickens

- (i) Broiler breeder chickens - Sexually mature male and female chickens intended to produce fertilized eggs for hatching into broilers or broiler breeder replacement chickens.
 - (ii) Layer breeder chickens - Sexually mature male and female chickens intended to produce fertilized eggs for hatching into laying hen replacement chickens or layer breeder replacement chickens.
- (4) Turkeys
 - (a) Growing turkeys – Turkeys that are grown for food.
 - (i) Starter/Grower – From day of hatch to approximately 13 weeks of age (females) and 16 weeks of age (males).
 - (ii) Finisher – From approximately 13 weeks of age (females) or 16 weeks of age (males) to desired market weight.
 - (b) Breeder replacement turkeys – Turkeys of both sexes that are grown from day of hatch to sexual maturity and intended to become breeder turkeys.
 - (c) Breeder turkeys – Sexually mature male and female turkeys intended to produce fertilized eggs for hatching into growing turkeys or breeder replacement turkeys.

Pet Food Committee
2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Tuesday, August 1, 2023
1:15–3:15 PM

Agenda

Roll call/Welcome and Opening Remarks

- 1) Labeling Work Group – (15) Liz
- 2) Copper Claim (20)— Stan/Liz
 - a) Consider recommendation of expert panel for low copper claim in PF10. Regulation PF10. Descriptive Terms [. . .] (d) Low Copper A dog food that bears on its label the claim “low copper,” “low in copper,” or words of similar designation shall: (1) Be substantiated as nutritionally adequate for one or more life stages in accordance with Regulation PF7; and (2) Contain a maximum of no more than 15 mg copper/kg DM and no more than 3.75 mg copper/1,000 kcal of metabolizable energy; and (3) Bear on its label in the Guaranteed Analysis in accordance with Regulation PF4 a guarantee for the maximum amount of copper in the dog food.
- 3) Human Grade/USDA Training—(15) Holly Jewell
- 4) Labeling Work Group—(15) Liz
- 5) Training and Outreach Sub-Committee Update (15) Holly Jewell
 - a) Workgroup reports
 - b) Half Day—PFLM Workshop at Midyear
 - c) 50-state webinar survey report
 - d) Labeling guide current/PFLM updated version

Feed and Feed Ingredient Manufacturing Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Wednesday, August 2, 2023
8:00–8:45 AM

Purpose Statement

Working cooperatively with the Food and Drug Administration, Canadian Food Inspection Agency, feed and feed ingredient manufacturers and other relevant domestic and international stakeholders, develop science- and risk-based regulations. Such regulations would support the implementation of effective inspection and compliance strategies as well as be useful in providing education and information to stakeholders. The overall goal is to minimize the presence of chemical, microbiological and physical hazards in animal feeds to the levels necessary to protect human and animal health.

Agenda

- 1.) Welcome and Committee Member Introduction (Charles Hubenka & Ken Bowers)
- 2.) Review Action Items/Reports from Working Groups and Liaisons
 - Working Group 3 – Update on Contaminant and Hazard Lab Strategy/Regulatory Program needs survey – Eric Brady .
 - AAFCO Regulatory Program Needs Yearly Survey Strategic Plan (Objective 3.2) update – Brady/Lab?
 - Working Group 4 – Update on AITS training – Eric Brady.
 - Nutrient Contaminant Working Group Update – Disband workgroup.
 - Workgroup (Ben Jones, Eric Brady, Johnathon Roberts, Dave Fairfield) Update on VSIP Section in Ch.5 – Charles Hubenka Report.
 - Edits in OP Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients – Jennifer Kormos Report.
- New Business:
 - Strategic Plan assignment for 20232025. Discussion/workgroups. See Attachments A & B.
- 3.) Canadian Regulatory Update (Laura Scott)
- 4.) Industry Stakeholder Updates
- 5.) Other Business

Attachment A

Objective 3.1 – Promote and integrate Animal Food Safety Systems.

Narrative: Develop and promote a food chain focused safety purpose, activities, and coordination for animal food regulatory agencies. Evaluate current system or systems already in place, identify gaps in model bill and regulations, collaborate with State and Federal Regulatory food/feed agencies, establish, and publish guidance materials and resource links. Multiple components are needed to make a strong Animal Food Safety Program that works cooperatively with FDA to advance human and animal health and safety. This objective aims to develop a roadmap that identifies some of the components that are needed to achieve this goal.

Tasks

1. Identify the elements (roadmap) and implement the activities needed to achieve the objective (considering the narrative [above] and tasks pbelow]). Note: A task related to evaluating the current system and identifying gaps has been added.
Responsible: Feed and Feed Ingredient Manufacturing Committee (FFIMC), Inspection and Sampling Committee (ISC), Enforcement Issues Committee (EIC) (joint meeting of committee leaders to develop the plan)
 - o **Deliverable:**
 - Identify needs, gaps and strategically plan activities (e.g., roadmap)
 - Realign the following tasks in accordance with the planned elements.
 - o **Timeframe:** Virtual calls before Midyear 2023 (two calls @ one hour each) (Chairs, Vices, Board Liaisons, President Elect, ED)

2. Align Chapter 5 of the OP with AFRPS. (Note: MBR was aligned with FSMA as part of 2017-2020 Strategic Plan. Some committees are already working on parts of Chapter 5 material.)
Responsible: EIC, ISC, FFIMC, Feed Labelling Committee (FLC), LMSC support (Committees with relevant sections)
 - o **Deliverable and Timeframe:**
 - Identify current gaps by Midyear 2024
 - Update Chapter 5 sections by December 2025

Attachment B

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

Narrative: Identify training and method needs of regulatory laboratories, collaborate with State and Federal Regulatory food/feed agencies to obtain methods, establish, and publish Best Practice guidance materials and resource links on AAFCO LMSC website. Design, implement and provide a training program for state regulatory laboratorians. Establish a Quality Assurance committee under the AAFCO LMSC to update and provide resources related to quality and accreditation. Provide a link on AAFCO website where state regulatory and state laboratory personnel can gain information on laboratory capabilities.

Tasks

1. Identify the elements (roadmap) and implement the activities needed to achieve the objective (considering the narrative [above] and tasks [below]).
Responsible: FFIM, LMSC (joint meeting of committee leaders to develop the plan)
 - o **Deliverable:**
 - Identify needs, gaps and strategically plan activities (e.g., roadmap)
 - Realign the following tasks in accordance with the planned elements.
 - o **Timeframe:** Virtual calls before Midyear 2023 (two calls @ one hour each) (Chairs, Vices, Board Liaisons, President Elect, ED)
2. (c) Survey SRP to identify testing needs. LMSC is currently running survey to identify analytes (Consider identifying criteria to determine what types of analytes will be on the sampling plan) and develop a library of methods and technology. Prior survey through FFIMC went to SRP seeking feedback on analytes of interest (toxins) with second part to identify lab capability. This will be done on a regular basis.
Responsible: FFIM, LMSC and include Pet Food Committee (PFC), due to the label modernization changes that will be taking place.
 - o **Deliverable:**
 - Send an annual Regulatory Method Needs Survey to State Regulatory Program Managers to access, rank and guide laboratory method and resource needs
 - Compile and present results of the survey
 - Prioritize needs based on survey results
 - Create or charge individual LMSC working groups with obtaining methods, planning training, and creating Best Practice Guidance documents for state laboratories
 - Publish resources on AAFCO website
 - o **Timeframe:** Summer 2023 (this is being done now), Annual each summer after

Attachment C

Scan QR code to review recommended edits to the Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients.



Education and Training Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Wednesday, August 2, 2023
8:45–9:45 AM

Agenda

Welcome, Introductions/Roll Call and Opening Remarks

Marissa Kost, Committee Chair

Workgroup Updates (20–25 mins)

Training Curriculum Update—Marissa Kost (DISBAND WORKGROUP)

- E-vote for committee approval done in July
- Discuss where these resources are housed

Leadership Training—Marissa Kost, NC

GOAL 1, Objective 1.2—Identify and develop organizational training for AAFCO leaders

<p>1. Improve orientation and training for Committee Chairs and Board members.</p> <p>Priority 1: Develop a draft template compiling training needed and identify process to determine needs and wants (develop a gap template).</p> <ul style="list-style-type: none"> • Identify work that has already been done and compile. Identify additional activities specific to the Board. • Develop a checklist for duties and deadlines. Leverage the Official Publication (OP) info into a cheat sheet. • Identify core training list for Committee Chairs, Board members, other leaders, and potential leaders. Examples include: <ul style="list-style-type: none"> ▪ Meeting facilitation ▪ Robert’s Rule of Order ▪ Budget 101 ▪ Strategic Thinking and Decision Making ▪ Exchange or shadow programs between states and with FDA (CVM or OHAFO Field) 	<p>Gap template draft by Seminar 2023 and Committee vote Annual 2023</p> <p>Gap Template Draft—Annual 2023 Committee Vote—September/October 2023</p>
<p>Priority 2: Develop an implementation framework. Leverage what has already been developed.</p> <ul style="list-style-type: none"> • Part of task should include identification of current training and needed training, including onboarding steps. • Ensure various roles are captured (e.g. FDA member, votes differently). • Orientation on Committee Chair expectations, roles, responsibilities, interactions, reporting to the Board and other committees. • Identify touchpoints—identify committee deliverables and flow. Assign to all committees and Board member to map. • Identify leadership mentors as part of framework (orientation, onboarding, and ongoing). • Include ongoing training for leadership enhancement. 	<p>Fall 2023—Short term</p>
<p>Priority 3: Develop a checklist to track implementation (ETC sub-committee).</p>	<p>Fall 2023</p>
<p>Priority 4: Identify leadership training (e.g., LinkedIn learning) available and develop AAFCO specific training based on Priority 1 for delivery.</p> <ul style="list-style-type: none"> • Develop for different delivery modalities (e.g. online and in person). 	<p>Fall 2023</p>

Priority 5: Implement training and tracking.	January 2024
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Training Endorsement Policy and Tables—Marissa Kost (**DISBAND WORKGROUP**)

- E-vote for committee approval done in July
- Workgroup fulfilled its charge to review policy and tables; necessary updates made
 - o New Training Proposal Form in Resources > Member Toolkit (AAFCO)
- New submission process and points of contact (AAFCO ED and FASS Rep.)

DigitalChalk Usage

b. BOD Approval to extend the current contract with Digital Chalk for a period of 1 year at a level of 150 monthly user logins as defined in the AAFCO Renewal Proposal 2022 - 150 Monthly Users.pdf attached, and that the BOD charge the Education and Training Committee with the task of reviewing the service currently being provided by Digital Chalk and potential clients and systems that may be better options moving forward. The recommendation from the ETC should be sent back to the BOD for approval prior to any RFP or charges being initiated. –12/2/22 via FeedBIN Vote

NEW—Laboratory Survey

<p>GOAL 2, Objective 2.1—Be the leading training resource for animal food regulators and laboratories within 5 years.</p> <p>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).</p> <ul style="list-style-type: none"> • 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 the survey timing). 	<p>Survey conducted Annual 2023</p> <p>Late August/early September 2023</p>
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Training Availability Updates (10–15 mins)

FDA OTED Training Update—Kimberly Hull and Traci Kelm, FDA OTED

Sub-Committee Updates (5 mins)

Feed Administrator’s Seminar Sub-Committee—Rick Manthei, MN

- Discuss FAS 2023 Feedback—Fontana Dam, NC
- FAS 2024—Any details, location (SC)

Midyear/Annual Sub-Committee

- Sub-committee is part of CIOC with ETC membership

GOAL 2, Objective 2.2—Enhance membership through recruitment, support, and sustainability.

<p>5. Transfer the Event Planning Workgroup to a new Sub-committee to oversee midyear and annual meeting. Similar to Seminar Sub-committee. This becomes an ongoing sub-committee.</p> <ul style="list-style-type: none"> • Confirm members of Sub-committee, complete with chairperson. Evaluate attendance and consider meeting evaluations to assess meeting relevance and success to members. Ensure timely development of meeting agendas. 	<p>January 2023</p>
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Workshop Calendar Request Updates (5 mins)

PFLM Workshop: Midyear 2024, Chattanooga, TN

- Regulators and Industry

New Business (5 mins)

Adjourn

Strategic Affairs Committee

2023 AAFCO Annual Meeting
Renaissance Baltimore Harborplace Hotel
Baltimore, Maryland
Wednesday, August 2, 2023
9:45–10:45 AM

Agenda

1. Introductions and Agenda Review
2. Strategic Plan
 - o 2023-2025: Update
 - o 2023-2025 SAC assignment update:
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: Kristen, Ashlee-Rose, George and Austin
 - Update
3. 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
 - *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).*
 - *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

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
Kristen, Ashlee-Rose, George and Austin (FC & SAC collab)	SP: Objective 1.3 Task 2	Establish charitable giving/scholarship framework.	Annual 2024

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)

Participants at Seminar were divided into 6 groups (5 in person, 1 virtual). Each group worked on two Objectives to establish Tasks. Follow up virtual calls were held October through March to finalize Tasks for each Objective.

1.2	1.3	2.1	2.2	3.1	3.2
Organizational Training AAFCO Leaders	Financial Management & Organizational Health	Regulatory and Lab Training	Enhance Membership	Integrated AFSS Roadmap	Integrated Lab AFSS Roadmap
Round 1		<i>Virtual</i>			
Scott	Ashlee-Rose	<i>Richard</i>	Kristin	Erin	Mark
Tim	Ken	<i>Eric N.</i>	Dave D.	Dave E.	Josh
Charlotte*	Mick	<i>Ali</i>	Liz	Jacob	George
	Stan	<i>Sally</i>	Hollis	Austin	
Round 2				<i>Virtual</i>	
Ashlee-Rose	Tim	George	Erin	<i>Richard</i>	Kristen
Ken	Stan	Josh	Dave E.	<i>Sharon</i>	Dave D.
Mick	Charlotte	Mark	Jacob	<i>Darrell</i>	Liz
			Austin	<i>Eric N.</i>	Hollis
				<i>Ali</i>	
Electronic version from:					
Ashlee-Rose	Stan (& Ashlee-Rose)	Josh	Erin	Dani	Dave D
Virtual Calls					
Charlotte	Ashlee-Rose	Austin	Jenny	Kristi	George
Marissa	Laura	Kristi	Liz	Erin	Dave D.
Scott	Michelle M.*	Miriam	Jacob	Jacob	Kristen
Eric B.	Austin	Ali	Hollis	Laura	Josh
Ashlee-Rose	Ken	Josh	Dave E.	Kent	Mark
Ken	Eric B.	Mark	Kristen	Darrell	Liz
Mick	Mick	George	Marissa	Dave E.	Hollis
Michelle M.*	Stan	Eric N.	Erin	Ali	Austin
Jo Lynn	Kent	Sharon	Dave D.	Sharon	
Austin	Charlotte	Sally	Jo Lynn	Eric N.	
Doug	Darrell		Austin	Austin	
Miriam	Jenny				
	Doug				

*Additional FDA participant

Strategic Planning participants unable to attend Seminar Task identification session: Kent, Eric B., Miriam, Jenny, Jo Lynn, Doug, Laura, Darrell, Kristi, Marissa

GOAL 1: Improve Organizational Infrastructure and Operations

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

TABLED

► **Objective 1.1: Evaluate current AAFCO internal protocols and processes to enhance operational efficiencies**

Narrative: Need to define internal protocols beyond what currently appears in Procedures Manual and OP (e.g. Standard Operating Procedures (SOPs) for FASS (Executive Assistant changeover), common contracting procedures (include legal advice), document and improve financial procedures (budget process). Increase awareness of procedures to enhance use and adherence.

- o T - Reconfigure internal operations to support shifting from legacy infrastructure to the operations necessary to support the future direction of AAFCO as determined by the Board.
- o T - Review infrastructure and operations and adjust as needed to align with the projected programs each year in July.
- o T - *Suggested alternate: Comprehensively review AAFCO roles and update as needed in the Procedures Manual.* Clarify AAFCO roles and expectations and increase awareness of such.
- o T - *Needs to be part of the protocols and processes evaluation tasks.* Create a comprehensive operations manual
- o T - *Needs to be part of the protocols and processes evaluation tasks.* Develop additional procedures where needed to ensure efficiency and consistency. Implement steps for quality assurance and maintenance for all association functions.
- o T - *Already in progress whereby Board Liaison to Committee is responsible.* Have a "committee coordinator" to maintain contact with Committee chairs to see that committee tasks are being performed in a timely manner between meetings. We have too many committees and subcommittees that don't complete tasks between meetings.

► **Objective 1.2 - Identify and develop organizational training for AAFCO leaders**

Narrative: Evaluate procedures, identify gaps, establish and implement procedures for onboarding and functionality in leadership roles (Board and Committee leaders).

Tasks

1. Improve orientation and training for Committee Chairs and Board members.

Responsible: Education and Training Committee (ETC) (with Subject Matter Expert help from experienced AAFCO members)

o **Deliverable:**

Priority 1: Develop a draft template compiling training needed and identify process to determine needs/wants (Develop a gap template).

- Identify work that has already been done and compile. Identify additional activities specific to the Board.
- Develop a checklist for duties and deadlines. Leverage the Official Publication (OP) info into a cheat sheet.
- Identify core training list for Committee Chairs, Board members, other leaders, and potential leaders. Examples include:
 - Meeting facilitation
 - Roberts Rule of Order
 - Budget 101
 - Strategic Thinking and Decision Making
 - Exchange or shadow programs between states and with FDA (CVM or OHAFO Field)

Timeframe: Gap template draft by Seminar 2023 and Committee vote Annual 2023.

Priority 2: Develop an implementation framework. Leverage what has already been developed.

- Part of task should include identification of current training and needed training including onboarding steps.
- Ensure various roles are captured, e.g. FDA member, votes differently.
- Orientation on Committee Chair expectations, roles, responsibilities, interactions, reporting to the Board and other committees.
- Identify touchpoints – identify committee deliverables and flow. Assign to all committees and Board member to map.
- Identify leadership mentors as part of framework (orientation/onboarding and ongoing).
- Include ongoing training for leadership enhancement.

Timeframe: Fall 2023 - Short term

Priority 3: Develop a checklist to track implementation (ETC Sub-committee).

Timeframe: Fall 2023.

Priority 4: Identify leadership training (e.g. Linked In learning) available and develop AAFCO specific training based on Priority 1 for delivery.

- Develop for different delivery modalities (e.g. online and in person).

Timeframe: Fall 2023.

Priority 5: Implement training and tracking.

Timeframe: January 2024.

2. Future Leadership -Identify potential leaders (e.g. Vice Chairs, Sub-committee chairs and working group leads) to support AAFCO (Board and Committee Chairs).

Responsible: Board Work Group (include President Elect and Nominating Committee)

o **Deliverable:**

- Detail a process to identify potential leaders and their development (e.g. Vice Chairs, Sub-committee chairs and working group leads) to support AAFCO.

o **Timeframe:** Seminar 2023

- ▶ **Objective 1.3 - Identify and pursue opportunities that improve financial management and advance organizational health**

Narrative: Evaluate procedures, identify gaps, establish and implement procedures to improve financial management. Identify financial training needs (e.g. budget and investment training)(Note this could be in training activity above). Achieve two years of operating funds in reserves.

Tasks

1. Explore and implement grant and other funding opportunities that expand and align with AAFCO strategic goals

Responsible: Executive Director (ED) (could include Board WG and/or Finance Committee (FC)); National Association of State Departments of Agriculture (NASDA) or Association of Food and Drug Officials (AFDO) could be resources since they are more experienced.

o **Deliverable:** Seek new cooperative agreements. How many attempts/requests and how much received within timeframe; to achieve two years' operating costs (amount Board is comfortable with having in reserves).

o **Timeframe:** Report out to Board at midyear and annual meetings (FC will be reporting to Board monthly; recognize individual grants etc., could have more frequent reporting requirements (e.g. monthly).

2. Establish charitable giving/scholarship framework.

Responsible: Strategic Affairs Committee (SAC) and FC

o **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.

o **Timeframe:** Annual meeting 2024.

3. Develop a procedure to identify resource needs associated with proposed projects (e.g. contract) for association review and approval (e.g. Pet Food Label Modernization, Hemp, NASDA cooperative agreement).

Responsible: ED then FC

o **Deliverable:** Need to develop tool (held in member toolkit), guidelines/procedures.

Tools/templates developed, implemented (including member education) and tracked for maintenance. FC will develop criteria for decision making on when to utilize contract resources (such as for quickly needed projects).

- Ensure tool and education for members on how to request resources is in leadership material.

o **Timeframe:** Develop method/tool by August 2023 and implement by January of 2024

4. Pursue revenue-generating opportunities to maintain a sound financial base.

Responsible: ED

- o **Deliverable:** Myriad of opportunities, one example: non-regulated entities set up booths, sponsors. Additional training and refreshers. Could do biennial brainstorming session at Seminar. ED pulls realistic ideas and conceptualizes.
- o **Timeframe:** Report to Board at Midyear for consideration in next fiscal budget

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 training resource for animal food regulators and laboratories within 5 years.**

Narrative: AAFCO has and will gather, develop and/or deliver, and serve as a repository for training material and/or activities. AAFCO doesn't necessarily do all of this ourselves.

Tasks

1. Develop a library of technical training resources, including both internal and external sources, (videos, white papers, etc.) for laboratories. ETC is already developing an analogous library for animal food regulators in LMS system.
Responsible: Laboratory Methods and Services Committee (LMSC), Proficiency Testing Program (PTP)
 - o **Deliverable:** Create a training resources library section on the AAFCO website.
 - o **Timeframe:** January 2024 and reviewed annually for relevant information.
2. Evaluate the training resources library at each mid-year meeting to determine whether any of them are appropriate for additional in-person training at future AAFCO meetings or other locations.
Responsible: LMSC, PTP
 - o **Deliverable:** Identify and work to deliver one in-person training opportunity each year.
 - o **Timeframe:** January 2024 and reviewed annually for relevant information.
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).
Responsible: ETC
 - o **Deliverable:** 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).
 - o **Timeframe:** Survey conducted Annual 2023.

Comments for consideration when addressing the tasks:

- Build a laboratory resource, based on methods using internal PTP data. For each method or analyte, identify any related whitepapers. Add a section for videos and start with the microbial sampling technique videos. Also consider a section on recorded presentations given previously. Kristie's talk at the 2022 Animal Feed Regulatory Program Standards (AFRPS) face to face meeting was stellar. It should be preserved.
- These resources likely exist through A2LA, Animal and Plant Health Laboratories, etc. but LMSC needs to put together the list of the most relevant ones and post it somewhere on the AAFCO website so new lab staff know where to find them.
- Resources will include, space and people. I would love to see a microscopy workshop be held with annual or midyear – however, this would require a location that could provide a university type setup with a room full of microscopes.
- AAFCO will be the repository for training resources, and once the association identifies these resources, they will need to be reviewed annually to make sure they are still appropriate. During this review we could also identify anything that could be further enhanced to in-person training.

► **Objective 2.2 - Enhance membership through recruitment, support and sustainability.**

Narrative: Membership activities include three areas: member engagement/services/support, member recruitment and communication.

Tasks

1. Reach out to members who haven't been attending AAFCO meetings. Why aren't they attending?
Responsible: ED

- o **Deliverable:** Create AAFCO letter of engagement and meet with the state feed control official virtually to help identify why the state may not be attending meetings. Data could be gathered via engagement survey. Given poor survey responses, targeted calls to states might be more effective. Offer full scholarship to attend Feed Administrator Seminar. Evaluate the reasons members aren't participating and provide recommendations to increase participation.
 - o **Timeframe:** March 1, 2023 (in time for FAS registration) and ongoing as permanent practice.
2. Stabilize committees with added participation.
Responsible: Current Issues & Outreach Committee (CIOC)
- o **Deliverable:** Reach out to newer people to introduce them to committees and reach out post meeting to determine if they would be willing to join any committee for participation. Assess the number of contacts made and success rate measured through new members participating on committees.
 - o **Timeframe:** January 2023.
3. Expand scholarship program to drive participation for new attendance.
Responsible: FC
- o **Deliverable:** Establish enhanced scholarship program based on feedback from Task 1 activities and Task 5 meeting feedback. Assess scholarship program success and provide recommendations for improvement.
 - o **Timeframe:** March 2023.
4. Develop and implement member toolkit and periodic newsletter.
Responsible: CIOC/ED
- o **Deliverable:** Develop a member communication toolkit, and restart newsletter, to be sent periodically (TBD) to members, advisors and published on the AAFCO website. Encourage members to share communication items with their leadership. Evaluate relevancy with members at least twice per year (could be discussed at Seminar). Consider whether website "hits" (open rates on email) can be measured to assess engagement with toolkit/newsletter.
 - o **Timeframe:** Midyear Meeting 2023.
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 that reports to ETC.
Responsible: CIOC with FASS support.
- o **Deliverable:** 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.
 - o **Timeframe:** January 2023.

Comments for consideration when addressing the tasks:

- Engagement survey results were poor. The task was abandoned after two attempts and sent back to the Board. Engagement should be treated like a program with inputs, short term, mid term, long term objectives, and evaluation points to determine success.
- CIOC was going to break engagement survey apart and have states call states. However, they were stretched too thin.
- Increased participation/attendance at meetings, increased web and BIN traffic, and increased satisfaction of AAFCO members would be indicators of enhanced membership.
- ED could work with FASS to establish what our current membership engagement numbers are, so we have a baseline to compare to and build on.
- Enhancing membership could be measured through the survey at the end of each meeting. We should be utilizing surveys more to gauge progress. Survey results are either forgotten altogether or are developed secondarily to the meeting itself. We should be tracking progress across years via surveys. Surveys should be developed with the idea that the data will build.
- New subcommittee would serve to make sure the midyear and annual meetings have well planned activities for new members as well as being another subcommittee opportunity that members could serve on to be more engaged.

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.**

Narrative: Develop and promote a food chain focused safety purpose, activities and coordination for animal food regulatory agencies. Evaluate current system or systems already in place, identify gaps in model bill and regulations, collaborate with State and Federal Regulatory food/feed agencies, establish and publish guidance materials and resource links. Multiple components are needed to make a strong Animal Food Safety Program that works cooperatively with FDA to advance human and animal health and safety. This objective aims to develop a roadmap that identifies some of the components that are needed to achieve this goal.

Tasks

1. Identify the elements (roadmap) and implement the activities needed to achieve the objective (considering the narrative (above) and tasks (below)). Note: A task related to evaluating the current system and identifying gaps may need to be added.
Responsible: Feed and Feed Ingredient Manufacturing Committee (FFIMC), Inspection and Sampling Committee (ISC), Enforcement Issues Committee (EIC) (joint meeting of committee leaders to develop the plan)
 - o **Deliverable:**
 - Identify needs, gaps and strategically plan activities (e.g. roadmap)
 - Realign the following tasks in accordance with the planned elements.
 - o **Timeframe:** Virtual call after Midyear 2023 (Chairs, Vices, Board Liaisons, President Elect, ED).
2. **Planning:**
 - a. Promote AFRPS collaborative workplanning between state regulatory programs (SRP) on an ongoing basis. AFRPS is model template to use whether an AFRPS state or not.
Responsible: ISC and EIC; Involve new State-Federal Collaboration Group (SFCG) (established Midyear 2023, not a standing committee OP p. 102, SFCG interaction with AAFCO committees TBD) formed as coordinator to facilitate AAFCO communications with FDA.
 - o **Deliverables:**
 - Establish working group contingent on Board direction with respect to SFCG to develop process and promotion activities.
 - Promote AFRPS planning component with non-AFRPS states. Offer template (model) to non-AFRPS states to help within state planning.
 - o **Timeframe:** Summer 2025.
 - b. Establish best practices document for collaboration between the SRP, and FDA with the goal to improve communication and work planning.
Responsible: SFCG with ISC
 - o **Deliverable:**
 - Establish working group committees within ISC to collaborate and create documents
 - Write Best Practice document(s); could be derivative of AFRPS
 - Publish Best Practice documents on AAFCO website as a resource for SRP
 - Present documents during ISC meetings to raise awareness
 - o **Timeframe:** Summer 2025.
 - c. Develop example structure of a feed regulatory program (e.g. equipment, job descriptions) and make available through AAFCO. (Note: Has been tried unsuccessfully.)
Responsible: ISC
 - o **Deliverables:**
 - Develop example structure of a feed programs (e.g. equipment, job descriptions)
 - Make example feed regulatory structure available through AAFCO.
 - Develop a library that contains examples from feed regulatory programs.
 - o **Timeframe:** Midyear 2024.
 - d. (Former Task 3) Align Chapter 5 of the OP with AFRPS. (Note: MBR was aligned with FSMA as part of 2017-2020 Strategic Plan. Some committees are already working on parts of Chapter 5 material.)

Responsible: EIC, ISC, FFIMC, Feed Labelling Committee (FLC), LMSC support
(Committees with relevant sections)

- o Deliverable and Timeframe:
 - Identify current gaps by Midyear 2024.
 - Update Chapter 5 sections by Dec. 2025.

3. **Promotion / Communications**

a. *(Former Task 2)* Develop messaging on impact of animal feed safety to human health with three audiences:

- Regulatory agency leadership
- Feed manufacturers including food processors
- Consumers

Responsible: CIOC

- o **Deliverable:**
 - Design a flyer that can be distributed at meetings and as a resource for State Regulatory agencies to use to educate consumers and manufacturers.
 - Develop a member informational platform containing guidance materials, resource links and a fact sheet to members, advisors and published on the AAFCO website.
 - Promote resources to ensure awareness.
 - Work with website redesign group to create ability to evaluate/track viewing of resources to measure impact. Add pop up to ask if information was helpful (Yes/No answer).

o **Timeframe:** Prepare and provide during Midyear meeting 2024.

b. *(Former Task 4)* Increase communication/collaboration among State and Federal Regulatory food/feed agencies.

i.

Responsible: Board together with SFCG

- o **Deliverable:** Evaluate the merit of AAFCO Board meeting with ORA/CVM leadership twice a year (one meeting could be virtual). Implement a second meeting if warranted. Develop a SOP with FASS Executive Assistant to facilitate meeting organization.

o **Timeframe:** Dec. 2023.

ii.

Responsible: Board - President

- o **Deliverable:** Send letter to Co-Chair of PFP (Barbara Cassens & Abe Brown) to increase AAFCO participation. (Consider adding ED and AFDO liaison as AAFCO participants).

o **Timeframe:** Dec. 2023.

iii.

Responsible: ISC

- o **Deliverable:** Integrate FDA state liaisons into Advanced Inspector Training (AITS) (in progress (total 50 of which 5 offered to FDA). Normalize the FDA participation numbers.
- o **Timeframe:** June 2023 *close off with documented participant rates in AITS planning documents.*

c. *(Former Task 5)* Act as Liaison to other organizations to monitor impacts on animal food safety systems.

Responsible: Board led with ED as liaison

- o **Deliverable:** Create/maintain relationships upon joining AAFCO. Identify relevant organization to connect and facilitate relationships with (e.g. Food and Agriculture Organization, CODEX, Partner Countries Canadian Food Inspection Agency, World Health Organization, AFDO, NASDA, FDA). Evaluate the merit of liaison activities (time effectiveness).

o **Timeframe:** Dec. 2023 with evaluation annually thereafter.

4. **Inspection Procedures**

a. Improve documentation on inspection procedures to align with AFSS. Feed inspection manual is already in place (review for clarity).

Responsible: ISC

- o **Deliverables:**

- Document regular process to review inspection manual and improve documentation.
 - o **Timeframe:** Midyear 2024.
5. **Training**
- a. Identify training gaps with respect to AFSS and the tools needed to increase staff competencies.
Responsible: ISC
- o **Deliverables:**
 - Send regular (establish annual/bi-annual frequency) surveys to assess needs.
 - Compile and present results of survey during ISC meetings.
 - Prioritize needs based on survey results.
 - Develop training plans, and training workshop proposals to submit for Board approval.
 - Promote training through AAFCO website to increase participation and reach those programs that do not regularly attend AAFCO meetings.
 - Create a training evaluation form to be completed by participants post-training.
 - Collaborate to send participant(s) post-training competency evaluations to assess training effectiveness.
 - o **Timeframe:** Summer 2025.
- b. Publish training resources on AAFCO website. Identify and develop additional training material needed. Support training to ensure proficiency.
Responsible: ISC
- o **Deliverables:**
 - Identify and publish training resources on AAFCO website in a central place. Include existing resources.
 - Identify and develop additional training material needed.
 - Develop strategies to support training to ensure proficiency.
 - o **Timeframe:** Midyear 2024 (new website dependent).
6. **Information Technology (IT) Infrastructure**
- a. Explore the ability to develop an integrated IT system. Optimally the IT system would integrate findings from multiple state systems to eliminate double/multiple entry. NOTE: LMSC is working on laboratory element as part of Objective 3.2. There is a need for collaboration for both inspection and sampling data collection. Recognize that a single platform has been tried with challenging results. Need IT expertise as part of working group. For example if there are results for a contaminant across several states how can inspection findings (including sampling) be compared, notably for regulatory action? Explore opportunity in the Cooperative Agreement with NASDA (RFA-FD-22-009).
Responsible: IT + ISC + LMSC (include SAFHER)
- o **Deliverable:**
 - Establish a working group to explore the ability to develop/use (SAFHER) an integrated IT system. Identify obstacles and potential ways to overcome them with an implementation plan.
 - o **Timeframe:** Midyear 2024.
7. **Quality systems**
- a. Provide resources related to quality and accreditation. Accredite both inspector and state program. Reference IFPTI and AFRPS. Provide a link on AAFCO website where state regulatory personnel can gain information on capabilities. LMSC are a resource if questions arise.
Responsible: ISC
- o **Deliverables:**
 - Establish a Quality Assurance sub-committee under the ISC to update and provide resources related to quality and accreditation. Need a system ensuring comparable results from different inspections.
 - Provide a link on AAFCO website where state regulatory personnel can access information.

- o **Timeframe:** In Progress: Annual 2024.

Comments for consideration when addressing the tasks:

- *Possible Task:* Collaboration to include sharing non-contract inspection outcomes and analytical results.
- *Possible Task:* Create an Annual Report of what peer organizations have done every 6 months, 12 months, etc. highlighting.
- Make Roadmap a Logic Diagram for program development.
- *Task Idea:* Develop a model Animal Feed Program and define roles and responsibilities that include model job descriptions and baseline salary suggestions for each role. Specify the duties of each position, the importance it has to both animal food and human food, and then communicate this to members so it can be used to justify additional positions or reorganizations in state programs. Each role could be further developed to show how different positions interact with other agencies, FDA, NASDA, etc. to advance human and animal health and safety. Note that a Model Feed Safety Program and Development Guide were put together for this purpose a number of years ago. They were published in the OP for a number of years (last included 2016, Chapter 5, pages 260 and 262). The rationale for removal was that FDA (along with state representation) had spent considerable resources developing the AFRPS. AFRPS is a comprehensive model feed safety program. The AAFCO model was removed so there is not a "competing" feed safety program model in the OP. MBR "enhancements" might include changes to Section 10 and Regulation 11 that would have state adoption of "all applicable sections of CFR Title 21" and AAFCO's new pet-food labelling guidelines. Might also add a section on "Cottage Pet Food" to help keep the MBR relevant.
- Survey results have been poor. Engagement should be treated like a program with inputs, short term, mid term, long term objectives, and evaluation points to determine success.
- CIOC was going to break engagement survey apart and have states call states. However, they were stretched too thin.
- Increased participation/attendance at meetings, increased web and BIN traffic, and increased satisfaction of AAFCO members would be indicators of enhanced membership.
- ED could work with FASS to establish what our current membership engagement numbers are, so we have a baseline to compare to and build on.
- Task 2 could be incorporated into the website re-design. CIOC could develop separate messages for these 3 groups explaining how feed safety affects human health.
- AAFCO should consider if some incentive to states would help increase participation. Perhaps pay travel costs for one individual. Limit to a certain number that apply first depending on money available.
- Task 5: Prior to looking to external relationships, evaluate whether our liaisons currently doing their jobs within AAFCO. Do our liaisons know what is going on in committees? Some accountability or a reason why liaisons are keeping up with committee work should be considered. Maybe some are better than others. This liaison relationship should be focused on in the plan to "build better board members". Moving externally – external liaisons should be reporting monthly. It may be an update of nothing, but there should be time left for 5 minute updates. It is important for us to maintain relationships with other "like" organizations in North America and monitor what is happening worldwide that may eventually affect us to prepare for any changes in laws. Monitoring changes is needed so AAFCO knows if we need to reach out to members when they may be impacted by legislative changes in their state or when we should make changes to the Model Bill and Regulations.
- How is what a peer organization doing relevant to AAFCO? Perhaps an annual report highlighting what peer organizations are doing allows us to foster closer relationships with other organizations and communicate to our members different resources that may be available to help the ultimate goal of advancing human and animal health and safety. AAFCO members are busy and sometimes struggle to keep up with everything that multiple organizations are doing. AAFCO can assist by compiling and sharing the most relevant things to our members.

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

Narrative: Identify training and method needs of regulatory laboratories, collaborate with State and Federal Regulatory food/feed agencies to obtain methods, establish, and publish Best Practice

guidance materials and resource links on AAFCO LMSC website. Design, implement and provide a training program for state regulatory laboratorians. Establish a Quality Assurance committee under the AAFCO LMSC to update and provide resources related to quality and accreditation. Provide a link on AAFCO website where state regulatory and state laboratory personnel can gain information on laboratory capabilities.

Tasks

1. Identify the elements (roadmap) and implement the activities needed to achieve the objective (considering the narrative [above] and tasks [below]).
Responsible: FFIM, LMSC (joint meeting of committee leaders to develop the plan)
 - o **Deliverable:**
 - Identify needs, gaps and strategically plan activities (e.g. roadmap).
 - Realign the following tasks in accordance with the planned elements.
 - o **Timeframe:** Virtual calls before Midyear 2023 (Chairs, Vices, Board Liaisons, President Elect, ED).

Laboratory roadmap elements of AFSS:

2. **Planning:**
 - a. Promote AFRPS collaborative sampling workplanning between lab and state regulatory programs (SRP) on an ongoing basis. AFRPS is model template to use whether an AFRPS state or not. Challenge is that FDA did not use with Lab Flexible Funding Model. Action underway to try to bring together in one. Have to be in AFRPS to be eligible for LFFM. Labs are not part of AFRPS annual meeting planning. Need to return to collaborative process. LMSC is currently running state survey to develop a library of methods and technology to support this.
Responsible: ISC and LMSC; New State-Federal Collaboration Committee (Eric Brady establishing at Midyear 2023) should be involved.
 - o **Deliverables:**
 - Establish working group to develop process and promotion activities.
 - Work with FDA to integrate LFFM with AFRPS and include labs in AFRPS annual meeting planning.
 - Promote AFRPS planning component with non-AFRPS states. Offer template (model) to non-AFRPS states to help within state planning.
 - o **Timeframe:** Summer 2025.
 - b. *(Former Task 4)* Establish best practices document for collaboration between the SRP, laboratories and FDA with the goal to improve communication and work planning.
Responsible: LMSC
 - o **Deliverables:**
 - Establish working group committees within LMSC to collaborate and create documents.
 - Write Best Practice document(s).
 - Publish Best Practice documents on AAFCO website as a resource for state laboratories.
 - Present documents during LMSC meetings to raise awareness.
 - o **Timeframe:** Summer 2025.
 - c. Survey SRP to identify testing needs. LMSC is currently running survey to identify analytes (Consider identifying criteria to determine what types of analytes will be on the sampling plan) and develop a library of methods and technology. Prior survey through FFIMC went to SRP seeking feedback on analytes of interest (toxins) with second part to identify lab capability. This will be done on a regular basis.
Responsible: FFIMC, LMSC and include Pet Food Committee (PFC), due to the label modernization changes that will be taking place.
 - o **Deliverables:**
 - Send an annual Regulatory Method Needs Survey to State Regulatory Program Managers to access, rank and guide laboratory method and resource needs.
 - Compile and present results of the survey

- Prioritize needs based on survey results.
 - (Former Task 2) Utilize information obtained from the SRP survey to develop and administer a survey of state laboratories to see what they need to address the needs of the SRP.
 - Create or charge individual LMSC working groups with obtaining methods, planning training, and creating Best Practice Guidance documents for state laboratories
 - Publish resources on AAFCO website
 - o **Timeframe:** Summer 2023 (this is being done now). Annual each summer thereafter.
 - d. Evaluate ability to create a network of laboratories to perform analytical work across states. State structure (legality and funding) makes fee for service a challenge.
Responsible: EIC lead and coordinate with ISC and LMSC.
 - o **Deliverables:**
 - Establish cross state coordination working group to identify a means to accomplish this. Note that methods need to be in the scope of accreditation for the third party lab. Note: PA is fee for service already and would be good participant for group.
 - Need issue examined (survey could obtain information) and ways to resolve it identified.
 - Determine legality in each state (acceptance of third party analysis) (note some states already do this, e.g.: NC and KS)
 - o **Timeframe:** Legality and state identification by Midyear 2024. Recommendation (including funding) in 2024 (fee for service).
 - e. Develop example structure of a feed lab for feed programs (e.g. equipment, job descriptions) and make available through AAFCO. (Note: Has been tried unsuccessfully.)
Responsible: LMSC
 - o **Deliverables:**
 - Develop example structure of a feed lab for feed programs (e.g. equipment, job descriptions).
 - Make example feed lab structure available through AAFCO.
 - Develop a library that contains examples from feed labs.
 - o **Timeframe:** Midyear 2024.
3. **Sampling Procedures**
- a. Improve documentation on sampling (properly, chain of custody). Sampling guide is already in place (review for clarity).
Responsible: ISC
 - o **Deliverables:**
 - Review sampling guide (clarity) and improve documentation.
 - Add chain of custody (up to point of acceptance transfer to lab). Within the lab, ISO addresses traceability.
 - o **Timeframe:** Midyear 2024.
 - b. Review sampling protocols to ensure sample and analyte integrity (e.g. exposure to light, heat). Adjust protocols as necessary and share via AAFCO (could be integrated with 2.a. above).
Responsible: ISC and LMSC.
 - o **Deliverable:**
 - Review and adjust sampling protocols to ensure sample and analyte integrity (e.g. exposure to light, heat). Share via AAFCO.
 - o **Timeframe:** Provide feedback on timing (leads need to assess all sampling procedures work and provide timelines).
 - c. Review sampling procedures (e.g. blocks, aseptic).
Responsible: ISC and collaborate with LMSC.
 - o **Deliverable:**
 - Review and update sampling procedures to ensure they are fit for purpose (e.g. blocks). Continue and complete procedures for aseptic.
 - o **Timeframe:** Midyear 2024.
 - d. Review inspector sampling to ensure consistency and proficiency with sampling protocols. Audit type function. AFRPS has audit standard.

Responsible: ISC

o **Deliverables:**

- Promote use of AFRPS audit process to ensure inspectors are proficient.
- Integrate audit function in Sampling Guide.
- Review and provide training resources to meet the needs identified from the audit.

o **Timeframe:** Midyear 2024.

4. **Analytical Methods**

- a. (Former Task 3) Develop and submit for approval projects to address method needs as identified in annual survey.

Responsible: LMSC lead, with FC and Board support

o **Deliverables:**

- Develop method needs statements for approval and plan to obtain funding for method development/validation projects for approval by Board.
- Develop training plans, and training workshop proposals to submit for Board approval and subsequent delivery.

o **Timeframe:** Summer 2024.

- b. Identify actionable levels relative to method limits as component of sampling plan. LMSC has information on LoD or LoQ when method developed. Need to identify priorities to improve LoD/LoQ for enforcement purposes (and timeline). LMSC can provide template to obtain information from state labs. (Information gathered from 2008 on, as part of method needs statements).

Responsible: EIC with LMSC support

o **Deliverables:**

- Identify current levels and additional actionable levels needed. Needs FDA participation.
- Identify priorities to improve LoD/LoQ for enforcement purposes (and timeline).

o **Timeframe:** Midyear 2023.

5. **Training**

- a. (Former Task 5) Identify training gaps among laboratories and the tools needed to increase staff competencies.

Responsible: LMSC

o **Deliverables:**

- Send annual laboratory surveys to access needs.
- Compile and present results of survey during LMSC meetings.
- Prioritize needs based on survey results.
- Develop training plans, and training workshop proposals to submit for Board approval.
- Promote training through AAFCO website to increase participation and reach those laboratories that do not regularly attend AAFCO meetings.
- Collaborate with AAFCO PTP to send participant(s) post-training competency samples to assess training effectiveness
- Create a training evaluation form to be completed by participants post-training.

o **Timeframe:** Summer 2025.

- b. Publish lab training resources on AAFCO website. Identify and develop additional training material needed. Support training to ensure proficiency.

Responsible: LMSC

o **Deliverables:**

- Identify and publish lab training resources on AAFCO website. Include existing resources like ISO so information is in a central place.
- Identify and develop additional training material needed.
- Develop strategies to support training to ensure proficiency.

o **Timeframe:** Midyear 2024 (new website dependent).

6. **Information Technology (IT) Infrastructure**

- a. Explore the ability to develop an integrated IT system. Optimally the IT system would integrate findings from multiple state systems to eliminate double/multiple entry. Recognize that a single

platform has been tried with challenging results. Existing challenge: Each state lab has different LIMS. How can this be integrated? Need IT expertise as part of working group. For example if there are results for a contaminant across several states how can they be compared, notably for regulatory action? Is there an opportunity in the Cooperative Agreement with NASDA (RFA-FD-22-009)?

Responsible: IT

o **Deliverable:**

- Establish a working group to explore the ability to develop an integrated IT system. Identify obstacles and potential ways to overcome them with an implementation plan. Need a system ensuring comparable results from different labs.

o **Timeframe:** Midyear 2024.

7. **Quality systems** (in good shape)

- a. Provide resources related to quality and accreditation. Provide a link on AAFCO website where state regulatory and state laboratory personnel can gain information on laboratory capabilities.

Responsible: LMSC with Philosophy and CIOC

o **Deliverables:**

- Establish a Quality Assurance committee under the AAFCO LMSC to update and provide resources related to quality and accreditation. Need a system ensuring comparable results from different labs.
- Provide a link on AAFCO website where state regulatory and laboratory personnel can gain information on laboratory capabilities.

o **Timeframe:** In Progress: Annual 2023.

Comments considered when developing the roadmap in Task 1:

- The challenge is trying to ensure the needs of both the state regulatory program and the laboratory are met and are synced with each other. The deliverable would be to develop a survey to send to the state regulatory program as well as state laboratories to identify needs of each. The committees would decide the survey questions, or what the surveys should look like. The results of the surveys would provide additional information on how to proceed further with the other Tasks.
- Should create an evaluation form to determine project success.
- *Given the limited response to surveys, additional action should be considered. Suggestion:* Daily surveys at meetings or workshops could be conducted during dedicated meeting time. The last 5 minutes during a meeting could be set aside to conduct a survey via a QR code. This might significantly improve responses.
- Improved communication and work planning should be assessed. Verbal assessment could be carried out or a survey done during workplanning meeting.
- Workplanning deliverable should be the document along with a plan to implement it.

The **Working Groups** provided additional feedback on other potential Tasks (below) associated with this Objective. They did not feel they needed to be completed at this time. Task 1 group should consider these and adjust the overall plan accordingly.

(Potential element of Task 1) Task - Funding capability from AAFCO. Needs training element too with sufficient priority and work to maintain proficiency (FERN lab concept). Consider adding microscopy to hazards. Provide funding for more method development for Biological and Chemical hazards in animal food.

WG comment: There is funding within AFRPS and LFFM to assist laboratories in method development. Not sure additional funding sources would be needed.

(Potential element of Task 1) Task - Develop a data base of core competencies of each state lab so all labs know where to go for assistance or training where they may have a shortcoming or lack of ability to perform certain tests. *IFPTI have one but have to be APHL member. Need to educate about APHL so people better understand value. Needs investigation regarding AAFCO role. Encourage labs to promote and participate in existing system*

WG comment: Not really sure how to address this topic. It might be part of Task 4 above.

(Potential element of Task 1) Task - needs elaboration to make specific task, e.g. promote PTP instead of leverage. Is it meant to align PTP with integrated animal food safety system? PTP is more nutrition than hazard: should it be expanded. Leverage PTP program and sampling data.

(Potential element of Task 1) Task - Need common consistent collection of data. If a priority, need activity broken down into manageable activities. Very big task. Need access to data first. Create data mining systems that can predict animal food mycotoxin hazards.

WG comment: This is currently being done through LFFM.

GOAL 4: Foster External Stakeholder Relationships

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

TABLED

► **Objective 4.1: - Identify stakeholders with common interests in order to prioritize, develop, and maintain professional relationships that advance AAFCO's Vision and Mission.**

Narrative: Stakeholder groups could be very extensive so identification and prioritization of select stakeholders will be key. Advancement opportunities could include financial, Association recognition and increased dialogue.

- T - Identify what AAFCO wants from each stakeholder.
- T - Evaluate current relationships for areas of improvement.
- T - Constantly evaluate if we have relationships with all organizations that we should be working with.
- T - *Intended for members (Richard). Moved to Group 2. Need to define what a personal relationship is. Need to define "feed regulatory agencies".*
- T - Increase attendance by new associations to AAFCO meetings and expand representation on committees
- T - Create a task force or committee that focuses on issues from stakeholders
- T - Send stakeholders a survey to assess needs for improvement
- T - *If ASAHA is defined as a priority stakeholder.* Investigate possible integration/interaction with applicable committee(s) in USAHA
- T - *See bullet above.* Liaison to USAHA?
- T - *If ASAHA is defined as a priority stakeholder.* Liaison to AVMA?
- T - *Moved to Goal 3 for consideration.*
- T - Communicate directly with AAFCO stakeholders. Identify and list stakeholders and assign a liaison (not necessarily a Board member). Assigned liaison keep stakeholders in the AAFCO loop by email and phone and reports back to the Board before each AAFCO meeting.
- Communication
 - Expand AAFCO presence at conferences and trade shows measuring the impact of our attendance. (This would include speaking engagements).
 - Increase our media presence through press releases and other promotional activities to expand our brand and awareness of important issues.
- T - *From Group 3: Doesn't fit in program alignment; moved to Group 4 as intended beneficiary is consumer. Note there is a component promoting State adoption. Added State adoption component to Group 2 for consideration as well, regarding regulatory uniformity. Complete and implement Pet Food Label Modernization Initiative (multi-year objective).*

