



# 2024 MIDYEAR MEETING **COMMITTEE MINUTES**

---

FROM  
AUGUST 2023  
BALTIMORE, MD



**AAFCO**  
Association of American Feed Control Officials

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# 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 9:05 ET**
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:** Ashlee-Rose Ferguson, Secretary-Treasurer
5. **Acceptance of Committee Reports from:** Current Issues and Outreach, Education and Training, Feed and Feed Ingredient Manufacturing, Feed Labeling, Inspection and Sampling, Ingredient 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.”)  
**Josh Arbaugh moves to accept committee reports; George Ferguson seconds; motion carries.**
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. Josh Arbaugh moves; George Ferguson seconds; motion carries.**
    - 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. Josh Arbaugh moves; Jamie Good seconds; motion carries.**

- 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. Josh Arbaugh moves; Chad Linton seconds; motion carries.**

- 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. Josh Arbaugh moves; David Husner seconds; motion carries.**

- 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. Josh Arbaugh moves; George Ferguson seconds; motion carries.**

- vi. IDC recommends making the following changes in ODI: (tentative ingredients do not go into ODI)

<b>IDC Meeting Date:</b>	<b>1/18/2023</b>		
<b>ODI Summary of Changes for OP</b>			
<b>Action</b>	<b>Ingredient Name</b>	<b>Reference</b>	<b>Comments (meeting)</b>
New Name and reference	<b>*Black Soldier Fly Larvae Oil (To Official)</b>	T33.29(A)	Business meeting xx/xx/xx
New Name and reference	<b>* Dried Fermentation Product (To Official)</b>	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. Josh Arbaugh moves; Chad Linton seconds; motion carries.**

- 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. Josh Arbaugh moves; Jamie Good seconds; motion carries.**

- 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. Josh Arbaugh moves; Landen Kidd seconds; motion carries.**

- 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. Josh Arbaugh moves; Falina Hutchinson seconds; motion carries.**

- 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. Josh Arbaugh moves; Trish Dunn seconds; motion carries.

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)
<a href="#">50</a> (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	<a href="#">FDA has no questions.</a> (PDF – 4 pages)

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

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)
<a href="#">58</a> (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	<a href="#">FDA has no questions.</a> (PDF - 3 pages)

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

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. Josh Arbaugh moves; JoLynn Otero seconds; motion carries.**

**Amendment by Kristen Green: Unintentional error in PF5 (F)(3). Replace the text with "The text shall be sufficiently large so as to be conspicuous and must not be smaller than 1/16 inch.**

**Josh Arbaugh moves; Landen Kidd seconds; motion carries.**

*\*Illinois and Canada abstain from voting.*

c. **Pet Food Committee:**

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- 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

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. Josh Arbaugh moves; Falina Hutchinson seconds; motion carries.**

**\*Illinois and Canada abstain from voting.**

- 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. Josh Arbaugh moves; Falina Hutchinson seconds; motion carries.**
- 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. Josh Arbaugh moves; Ashlee-Rose Ferguson seconds; motion carries.**
  - 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. Josh Arbaugh moves; Ashlee-Rose Ferguson seconds; motion carries.**

- 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. Josh Arbaugh moves; George Ferguson seconds; motion carries.**

- 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. Josh Arbaugh moves; Scott Ziehr seconds; motion carries.**

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 Husner, PA

Immediate Past President: Eric Brady, TN

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

7. **Credential Report: FASS**

Number of voting members represented in-person: 33

Number of voting members represented virtually: 6

Number of states in attendance: Overall 42 states represented (Not necessarily available to vote)

Number of countries: 6

Number of FDA representatives: 45

Number of life members: 3

Total meeting attendance: 360 Attendees In-Person, 88 Attendees Virtually

8. **Meeting Concluded at 9:51 ET.**

Full meeting minutes can be found at <https://www.aafco.org/events/association-business-meeting-minutes/> .



## **Current Issues and Outreach Committee Report**

2023 AAFCO Annual Meeting

July 31, 1:15–1:45 pm EDT, Baltimore, MD

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Recommendations:** None

### **Committee Participants**

**Members Present:** Jo Lynn Otero (NM), Bethany McAnulty (TN), Kristen Green (KY), Debra Gray (KS), Nathan Moon (FDA), Wendy Powell (MI)

**Advisors Present:** Bill Bookout, Steve Yonker, Dave Fairfield, Louise Calderwood

### **Committee Report**

#### **CIOC/Philosophy Workgroup Updates: Tera Keatts – Philosophy Communications**

- 65% Uptick of media release coverage in the past year. Austin has conducted two podcast interviews
- Increase in social media following
- Job opportunity board
- PFLM approved by membership
  - Media announces and training material

#### **IFPT Research Presentation on African Swine Fever: Vianca Philpotts – Washington**

##### **Department of Agriculture**

- Found in Africa 1900
- Domestic and wild swine and ticks
- Offload human waste from airplane in disposal
- Wild pigs ate it
- Transferred to domestic
- Can survive on clothing
- Currently USA is green – No African Swine Fever

#### **AAFCO 101 Update and New Members: Jo Lynn Otero**

- AAFCO 101 was a success, but we could still use some ambassador volunteers.
- Bethany has been approved as Co-chair.

#### **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.
- PFLM will be uploaded for Regulators.
- Newsletter will be going out after this meeting; let us know if you didn’t receive.
- 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/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.

**Committee Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing/Status</b>
CIOC	Develop messaging on impact of animal feed safety to human health with three audiences: <ul style="list-style-type: none"> <li>• Regulatory agency leadership</li> <li>• Feed manufacturers including food processors</li> <li>• Consumers</li> </ul>	<ul style="list-style-type: none"> <li>• Design a flyer that can be distributed at meetings and as a resource for State Regulatory agencies to use to educate consumers and manufacturers.</li> <li>• Develop a member informational platform containing guidance materials, resource links and a fact sheet to members, advisors and published on the AAFCO website.</li> <li>• Promote resources to ensure awareness.</li> <li>• 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).</li> </ul>	Prepare and provide during Midyear meeting 2024

## Education and Training Committee Report

2023 AAFCO Annual Meeting  
August 2, 8:45–9:45 am EDT, Baltimore, MD

### Committee Recommendations:

- 1) Approve and make the following documents available to AAFCO members: 2022 Coursework Curriculum (Attachment A) and Training Path for AF Investigators (Attachment B)

**Board Recommendations:** None

**Association Recommendations:** None

### Committee Participants

**Members Present:** Marissa Kost (Chair) – NC, George Ferguson – NC, Jennifer Godwin – FDA, David Husner – PA, Kevin Klommmhaus – FDA, Bethany McAnulty – TN, Jo Lynn Otero – NM, Laura Scott – CFIA (proxy for Robert Murray), Shaness Thomas – FL, Jim True – KY, Daniel Zangari – CO  
**Advisors Present:** Bill Bookout – APPA, David Fairfield – NGFA, Jacob Fleig – AFDO, Pat Tovey – PFI, Amy Tryon DaPrato – PFI

**Virtual Attendees:** Kimberly Hull – FDA, Traci Kelm – FDA, Samantha Moran-Defty – CA, Others  
**Present:** Steve Younkers – AFIA, Louise Calderwood – AFIA, Vinetta Howard-King – FDA

### Committee Report

#### Committee Activities

Virtual meeting held on June 27, 2023, to prepare for upcoming Annual meeting. A quorum was not present with only 10 of 23 voting members, including Marissa Kost, Danielle Borchert, Sean Cheney (non-member), David Dressler-Husner, Jacob Fleig, Kimberly Hull, Darrell Johnson, Samantha Moran-Defty, Jo Lynn Otero, Neil Richmond, Shaness Thomas, Pat Tovey, Jim True, and Daniel Zangari. An e-vote was done to approve the Coursework Curriculum Update WG on July 28, 2023.

**ACTION:** Accept the Training Curriculum Update WG's documents (Attachment A & B) for approval.

**MOTION:** "I move to accept the Training Curriculum workgroup's documents," David Dressler-Husner/second: Bethany McAnulty – passes

### Committee Minutes

Marissa Kost, Chair, called the meeting to order at 8:45 AM (EDT).

#### • Workgroup Updates

- Training Curriculum Update: Committee held a pre-meeting call in July to approve documents; e-vote done via email due to pre-meeting attendance; passed ETC membership vote; send to BOD for approval and determine where to house resources for all members.
- Leadership Training: WG met last month to review past work done and compile information; currently reviewing the OP to add duties/responsibilities for leadership roles; WG plans to meet again this month to finalize the draft gap analysis for Priority 1; WG will move the committee vote to Fall e-vote once all deliverables are complete; still anticipate staying on track for January 2024 implementation.
  - Members: Marissa Kost, George Ferguson, Jo Lynn Otero, Jim True, Jacob Fleig, Danielle Borchert

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

1. Improve orientation and training for Committee Chairs and Board members. <b>Priority 1:</b> Develop a draft gap analysis compiling training needed and identify process to determine needs/wants (Develop a gap template). <ul style="list-style-type: none"><li>• Identify work that has already been done and compile. Identify additional activities specific to the Board.</li><li>• Develop a checklist for duties and deadlines. Leverage the Official Publication (OP) info into a cheat sheet.</li></ul>	Draft Gap Analysis – Early October 2023
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<ul style="list-style-type: none"> <li>Identify core training list for Committee Chairs, Board members, other leaders, and potential leaders. Examples include: <ul style="list-style-type: none"> <li>Meeting facilitation</li> <li>Roberts Rule of Order</li> <li>Budget 101</li> <li>Strategic Thinking and Decision Making</li> <li>Exchange or shadow programs between states and with FDA (CVM or OHAFO Field)</li> </ul> </li> </ul>	
<p><b>Priority 2:</b> Develop an implementation framework. Leverage what has already been developed.</p> <ul style="list-style-type: none"> <li>Part of task should include identification of current training and needed training including onboarding steps.</li> <li>Ensure various roles are captured, e.g. FDA member, votes differently.</li> <li>Orientation on Committee Chair expectations, roles, responsibilities, interactions, reporting to the Board and other committees.</li> <li>Identify touchpoints – identify committee deliverables and flow. Assign to all committees and Board member to map.</li> <li>Identify leadership mentors as part of framework (orientation/onboarding and ongoing).</li> <li>Include ongoing training for leadership enhancement.</li> </ul>	Fall 2023 - Short term
<p><b>Priority 3:</b> Develop a checklist to track implementation (ETC Sub-committee).</p>	Fall 2023
<p><b>Priority 4:</b> Identify leadership training (e.g. Linked In learning) available and develop AAFCO specific training based on Priority 1 for delivery.</p> <ul style="list-style-type: none"> <li>Develop for different delivery modalities (e.g. online and in person).</li> </ul>	Fall 2023
<p><b>Priority 5:</b> Implement training and tracking.</p>	January 2024

- Training Endorsement Policy & Tables: WG fulfilled its charge to review policy & tables; WG had no changes to tables at the time; only update was creation of mock budget for online training submissions.
  - New submission process/points of contact (AAFCO ED & FASS Rep.); WG will make updates to Table 5 in OP will be made in lieu of this requested change – will be sent for membership vote to approve; New Training Proposal Form in Resources > Member Toolkit (AAFCO)
  - Members: Nathan Price, Kate Nelson, Eric Brady, Scott Absher, Marissa Kost
- DigitalChalk Usage: Kate Nelson will be chairing this WG with additional membership from Marissa Kost (due to previous experience with the platform) and Jacob Fleig; WG plans to meet later this month to review DigitalChalk and other options/available platforms; options will be sent to BOD for review by late Fall/early December.

BOD Approval to extend the current contract with Digital Chalk for a period of one 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 offered by DigitalChalk and potential clients/systems that may be better options for moving forward. The recommendation from the ETC should be sent back to the BOD for approval prior to any RFP or changes being initiated. – 12/2/22 via FeedBIN Vote

  - Members: Kate Nelson, Jacob Fleig, Marissa Kost [1-2 additional volunteers – TBD]
- Laboratory Survey: Updated deadline to Fall 2023; still need additional clarity from BOD regarding survey content and SMEs for any pertinent laboratory content

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

<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"> <li>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</li> </ul>	Late September/ Early October 2023
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documented process for proponents to identify training needs on an ongoing basis (e.g. outside of the survey timing).	
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- **Training Availability Updates**

- FDA OTED Training: Kimberly Hull and Traci Kelm, FDA OTED; OTED plans to offer the following training courses in FY24:

Course	Dates
VM102 CGMP Animal Food Course*	October 2023, February 2024, May 2024
VM209 BSE Inspection Course	November 2023, February 2024, May 2024
VM214 Medicated Feed Inspection Course	November 2023, February 2024, May 2024
VM230 VFD Inspection Course	November 2023, February 2024, May 2024
VM220 PC Animal Food Course*	January 2024, April 2024, July 2024

**\*VM102 CGMPs and VM220 PC for Animal Food Regulators will be in person FY24.**

- Please note: One additional day will be added to the VM209 BSE, VM214 MFI, and VM230 VFD, courses that will include one day for the Web-Based Training (WBT). These will be offered virtually: BSE and MFI will be one week and VFD will be held another week.
- As of May 1, 2023, state participants planning to attend OTED animal food courses are required to complete the new Principles of Evidence Development for State and Local Regulators (FD8020W) web-based training.
- Back in November 14-18, 2022, FDA held a Animal Food Job-Task Analysis (JTA) meeting; the results of this were finalized in May 2023; contact Kim or Traci for a copy of results from that JTA.

- **Sub-Committee Updates**

- Feed Administrator’s Seminar Sub-Committee: George Ferguson, NC, provided an update from the 2023 FAS held in Fontana Dam, NC
  - Future FAS: 2024, South Carolina; 2025, Kentucky
- Midyear/Annual Sub-Committee: Sub-committee is part of CIOC with ETC membership from Bethany McAnulty and Jim True (will be volunteering on a trial basis)

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

<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	January 2023 – completed
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- **Workshop Calendar Request Updates**

- PFLM Workshop: Midyear 2024, Chattanooga, TN – Regulators & Industry

**Action Items**

Responsible	Item	Action	Timing / Status
Leadership Training WG	Finalize deliverables	Draft Gap Template; framework, checklist, identify training; implement/tracking	Early Oct 2023: Gap Template Late Fall 2023: Priority #2-4 Jan 2024: Implement/Track
Training Endorsement Policy WG	Finalize updates to Table 5 in OP with new POCs	Finalize Table 5 updates for OP; send to BOD/ED for membership vote	October 2023
DigitalChalk Usage WG	Revised Charge from BOD	Recruit members, review revised charge from BOD, schedule meetings, solicit feedback of LMS, provide recommendation to BOD	Late Fall/Early Dec 2023: send recommendation to BOD



Responsible	Item	Action	Timing / Status
Laboratory Survey WG	Review task from SAC and deliverables	Feedback from BOD, recruit members, review task out of SAC, develop survey, send out survey, compile/analyze results	Fall 2023: survey conducted Oct 2023: results to BOD

**Appendix A:** 2022 Coursework Curriculum 12.20.2022\_FINAL

**Appendix B:** Training Path for Animal Food Investigators Guidance

**Minutes approved 10/13/2023. 12 voting in the affirmative.**

### **Attachment A: 2022 Coursework Curriculum 12.20.2022\_FINAL**

**Coursework Curriculum 12/20/2022**

**Disclaimer:**

The documented was created by the Association of American Feed Control Officials Education and Training Committee and is subject to change. It is comprised of known free course available when the list was published. Not all courses in all subject areas would be necessary to meet the requirements of the Animal Feed Regulatory Program Standards. The categorization of the following courses as “basic” or “advanced” is only a suggestion, and states should use their own discretion.

**Resources:**

AAFCO Publications:w

<https://www.aafco.org/Publications>

FDA LearnED:

<https://fdaoted.csod.com/>

FDA ComplianceWire:

<https://www.compliancewire.com/>

FEMA: Federal Emergency Management Agency (FEMA); National Incident Management System (NIMS):

<http://training.fema.gov/IS/NIMS.asp>

International Food Protection Training Institute (IFPTI):

<https://ifpti.absorbtraining.com/#/login>

Food Safety Preventive Controls Alliance (FSPCA):

<https://www.ifsh.iit.edu/fspca/fspca-preventive-controls-animal-food>

WIFSS: Western Institute for Food Safety & Security (WIFSS):

<https://www.wifss.ucdavis.edu/courses/>

FDA Animal and Veterinary Website:

<https://www.fda.gov/animal-veterinary>

YouTube:

<https://www.youtube.com>

NOTE: Center of Veterinary Medicine (CVM) placed CVM DVD resources on FDA Animal and Veterinary Website and LearnED)

### **Basic Feed Inspector Training Curriculum**

#### **ANIMAL AND PUBLIC HEALTH PRINCIPLES**

Public Health Principles FDA36 – FDA ComplianceWire

Public Health Principles CC8026W – FDA LearnED

#### **ANIMAL FOOD DEFENSE**

An Introduction to the Public Health and Security and Bioterrorism Preparedness and Response Act of 2002 FDA56 – FDA ComplianceWire

Bioterrorism Act of 2002 – Prior Notice FDA59 – FDA ComplianceWire

Bioterrorism Act of 2002 – Registration of Food Facilities FDA58 – FDA ComplianceWire

Food Defense CC8027W – FDA LearnED

### **BASIC ANIMAL NUTRITION**

Grain and Feed Mill Operations VM101W100 – FDA LearnED  
Animal Classification VM8001W – FDA LearnED  
An Introduction to Animal Husbandry and Nutrition CC6001K (printable document) – FDA LearnED  
Livestock Production CC6000K (video) – FDA LearnED

### **BASIC INGREDIENTS, PROCESSING, AND TECHNOLOGY**

Grain and Feed Mill Operations VM101W100 – FDA LearnED  
Animal Food and Ingredients VM8002W – FDA LearnED  
Animal Food and Ingredients – IFPTI (subject to cost)  
Animal Food and Ingredients VM6001K (video) – FDA LearnED

### **BASIC INCIDENT MANAGEMENT SYSTEM AND INCIDENT COMMAND SYSTEM (ICS) – FEMA**

IS-100.c, Introduction to Incident Command System, ICS-100  
IS-200.c, Basic Incident Command System for Initial Response ICS-200  
IS-700.b, An Introduction to the National Incident Management System ICS-700  
IS-800.d, National Response Framework, An Introduction, ICS-800

### **COMMUNICATION**

Communication Skills for Regulators – IFPTI (subject to cost)  
Communication Skills for Regulators CC8011W – FDA LearnED  
Communication Skills CC8030W – FDA LearnED  
Active Listening Skills EHS02 – FDA ComplianceWire  
Interviewing Techniques FDA27 – FDA ComplianceWire  
FDA Establishment Inspection Report Writing FDA26 – FDA ComplianceWire

### **CURRENT STATUTES, REGULATIONS, AND POLICIES**

Food & Drug Law: FDA Jurisdictions FDA01 – FDA ComplianceWire  
Food & Drug Law: Prohibited Actions FDA02 – FDA ComplianceWire  
Food & Drug Law: Judicial Actions FDA03 – FDA ComplianceWire  
Food & Drug Law: Criminal Acts Violations FDA04 – ComplianceWire  
Food & Drug Law: Imports & Exports FDA05 – FDA ComplianceWire  
Recalls of FDA Regulated Products FDA24 – FDA ComplianceWire  
Animal Food Laws and Regulations VM8003W – FDA LearnED  
Complaints and Recalls VM6004K – FDA LearnED  
Principles of Evidence Development for State and Local Regulators FD8020W – FDA LearnED

### **INSPECTIONS, COMPLIANCE, AND ENFORCEMENT**

Expected Conduct of FDA Personnel FDA20 – FDA ComplianceWire  
Evidence & Proof FDA22 – FDA ComplianceWire  
FDA Establishment Inspection ReportWriting FDA26 – FDA ComplianceWire  
FDA Establishment Inspection FDA32 – FDA ComplianceWire  
Basics of Inspection: Beginning an Inspection FDA38 – FDA ComplianceWire  
Basics of Inspection: Issues & Observations FDA39 – FDA ComplianceWire  
Medicated Animal Feed VM6005K (video) – FDA LearnED  
FDA 483s: Inspectional Observations FDA30 – FDA ComplianceWire  
Courtroom Testimony FDA46 – FDA ComplianceWire  
Photography for FDA Enforcement FDA47 – FDA ComplianceWire  
FDA Jurisdiction FDA01 – FDA ComplianceWire  
Prohibited Acts FDA02 – FDA ComplianceWire  
Judicial Actions FDA03 – FDA ComplianceWire  
Criminal Acts Violations FDA04 – FDA ComplianceWire  
Animal Food Laws and Regulations VM8003W – FDA LearnED

Regulatory Foundations of Current Good Manufacturing Practices (CGMPs) for Food VM8000W – FDA LearnED  
Current Good Manufacturing Practice (CGMP) for Animal Food Regulators Course VM102 (instructor-led) – FDA LearnED  
Principles of Evidence Development for State and Local Regulators FD8020W – FDA LearnED

### **LABELING**

Animal Food Ingredients VM6001K (video) – FDA LearnED  
Animal Food Labeling VM8004W – FDA LearnED  
Animal Food Product Labels VM6002K (video) – FDA LearnED  
Labeling CC8038W – FDA LearnED  
Food Labeling CC8003W – FDA LearnED

### **PROFESSIONALISM**

Improving Productivity FDA49 – FDA ComplianceWire  
Self-Motivation FDA94 – FDA ComplianceWire  
Overcoming Negativity in the Workplace FDA95 – FDA ComplianceWire  
Professionalism CC8025W – FDA LearnED

### **RISK AWARENESS**

Bovine Spongiform Encephalopathy BSE01 – FDA ComplianceWire  
BSE Inspectional Approach BSE02 – FDA ComplianceWire  
Biological Hazards CC8028W – FDA LearnED  
Environmental Hazards CC8024W – FDA LearnED  
BSE VM6003K (video) – FDA LearnED  
BSE Inspection Course VM209 (instructor-led) – FDA LearnED (completion of BSE Inspection VM209W100 prerequisite is required)  
Veterinary Feed Directive Inspection VM230 (instructor-led) – FDA LearnED (completion of VFD Inspection VM230W100 prerequisite is required)

### **SAFETY**

Combustible and Flammable Liquids EHS12 – FDA ComplianceWire  
Electrical Safety EHS23 – FDA ComplianceWire  
First Aid EHS32 – FDA ComplianceWire  
Hazard Communications EHS37 – FDA ComplianceWire  
Hearing Conservation EHS43 – FDA ComplianceWire  
Heat Stress EHS44 – FDA ComplianceWire  
Machine Safeguarding EHS59 – FDA ComplianceWire  
Personal Protective Equipment EHS67 – FDA ComplianceWire  
Respiratory Protection EHS82 – FDA ComplianceWire  
Walking and Working Surfaces - Affected Person EHS98 – FDA ComplianceWire  
Computer Work Station Safety EHS14 – FDA ComplianceWire  
Fitness for Work, Ergonomics, Body Mechanics and Fitness EHS33 – FDA ComplianceWire  
Confined Space Entry EHS15 – FDA ComplianceWire  
Grain and Feed Mill Operations VM101W100 – FDA LearnED  
Personal Safety CC8031W – FDA LearnED

### **SAMPLE COLLECTION**

Sample Collection FDA 23 – FDA ComplianceWire  
Food Microbiological Control 10: Aseptic Sampling MIC 13 – FDA ComplianceWire  
Animal Food Sampling – IFPTI (subject to cost)  
Animal Food Sampling VM8005W – FDA LearnED

## **YouTube Videos**

Sampling of Feed Blocks and Tubs

<https://www.youtube.com/watch?v=LDV-eZZD9kY>

Sampling of Liquid Feed

<https://www.youtube.com/watch?v=TuaJH2aCBxg>

Sampling Feed Bags

<https://www.youtube.com/watch?v=h4QwgUsN2fc>

Horizontal Sampling with a Double Sleeve Trier

<https://www.youtube.com/watch?v=IGaBAhyhWkE>

Sampling of Bulk Bags

<https://www.youtube.com/watch?v=9HuxEuXhB3A>

Sampling of Feed for Bulk Trucks

<https://www.youtube.com/watch?v=W4mgt3wds2I>

Forage and Grain Feed Testing

<https://www.youtube.com/watch?v=AtF191-yjgQ>

## **Advanced Feed Inspector Training Curriculum**

### **ADVANCED INGREDIENTS, PROCESSING, AND TECHNOLOGY**

Medicated Feed Inspection VM214 (instructor-led) – FDA LearnED (completion of Medicated Feed

Inspection VM214W100 prerequisite is required)

Medicated Animal Feed VM6005K (video) – FDA LearnED

### **ADVANCED INSPECTIONS, COMPLIANCE, AND ENFORCEMENT**

Intermediate ICS for Expanding Incidents ICS 300\* (instructor-led) – FEMA

Intermediate ICS for Expanding Incidents ER300 (instructor-led) – FDA LearnED

Advanced ICS for Command and General Staff ICS 400\* – FEMA

Advanced ICS for Command and General Staff ER400 (instructor-led) – FDA LearnED

\*These courses are offered regionally on an as needed basis.

BSE/Feed Establishments Audit VM212W100 – FDA LearnED

BSE Inspection VM209 (instructor-led) – FDA LearnED (completion of BSE Inspection VM209W100 prerequisite is required)

BSE Truck Cleanout Video – FDA Animal and Veterinary Website (<https://www.fda.gov/animal-veterinary/bovine-spongiform-encephalopathy/preventing-spread-bse-video>)

Medicated Feed Inspection VM214 (instructor-led) – LearnED (completion of Medicated Feed Inspection VM214W100 prerequisite is required)

Veterinary Feed Directive Inspection VM230 (instructor-led) – FDA LearnED (completion of VFD Inspection VM230W100 prerequisite is required)

### **ADVANCED LABELING**

Livestock Production CC6000K (video) – FDA LearnED

Animal Food Product Labels VM6002K (video) – FDA LearnED

AAFCO Non-Pet Food Labeling Guide – AAFCO

AAFCO Pet Food Labeling Guide – AAFCO

### **ANIMAL ILLNESS AND DEATH INVESTIGATION**

Medicated Feed Inspection VM214 (instructor-led) – FDA LearnED (completion of Medicated Feed Inspection VM214W100 prerequisite is required)

Complaints and Recalls VM6004K(video) – FDA LearnED

Livestock Production CC6000K (video) – FDA LearnED

Feed Investigation Chapter – AAFCO Feed Inspector's Manual (printable document) – AAFCO Publications Website

## **CURRENT STATUTES, REGULATIONS, AND POLICIES**

BSE Inspection VM209 (instructor-led) – FDA LearnED (completion of BSE Inspection VM209W100 prerequisite is required)

Medicated Feed Inspection VM214 (instructor-led) – FDA LearnED (completion of Medicated Feed Inspection VM214W100 prerequisite is required)

FSPCA Preventive Controls for Animal Food (FSPCAA) (instructor-led) – IFSH-FSPCA (subject to cost)

Food and Drug Law: Imports and Exports FDA05 – FDA ComplianceWire Regulatory Foundations of PCs for Food for Animals VM9000W – FDALearnED

Preventive Controls for Animal Food Regulators VM220 (instructor-led) – FDA LearnED

## **EPIDEMIOLOGY**

Biosecurity CC8023W – FDA LearnED

Foodborne Illness Investigations 1: Collecting Surveillance Data FI01 – FDA ComplianceWire

Foodborne Illness Investigations 2: Beginning an Investigation FI02 – FDA ComplianceWire

Foodborne Illness Investigations 3: Expanding the Investigation FI03 – FDA ComplianceWire

Foodborne Illness Investigations 4: Conducting a Food Hazard Review FI04 – FDA ComplianceWire

Foodborne Illness Investigations 5: Epidemiological Statistics FI05 – FDA ComplianceWire

Foodborne Illness Investigations 6: Final Report FI06 – FDA ComplianceWire

Epi-Ready for Response Teams ER324 (instructor-led) – FDA LearnEd

## **MICROBIOLOGICAL PATHOGENS**

Overview of Microbiology MIC01 – FDA ComplianceWire

Gram-Negative Rods MIC02 – FDA ComplianceWire

Gram-Positive Rods MIC03 – FDA ComplianceWire

Foodborne Viruses MIC04 – FDA ComplianceWire

Foodborne Parasites MIC05 – FDA ComplianceWire

Controlling Growth Factors MIC06 – FDA ComplianceWire

Mid-Series Exam MIC16 – FDA ComplianceWire

Control by Refrigeration & Freezing MIC07 – FDA ComplianceWire

Control by Thermal Processing MIC08 – FDA ComplianceWire

Control by Pasteurization MIC09 – FDA ComplianceWire

Control by Retorting MIC10 – FDA ComplianceWire

Preventing Microbial Cross-Contamination FOOD3 – FDA ComplianceWire

## **TRACEBACK AND TRACEFORWARD INVESTIGATIONS**

Traceability CC8042W – FDA LearnED

Traceback Investigations 1: Introduction TI01 – FDA ComplianceWire

Traceback Investigations 2: Point-of-Service Investigations TI02 – FDA ComplianceWire

Traceback Investigations 3: Distributor Investigations TI03 – FDA ComplianceWire

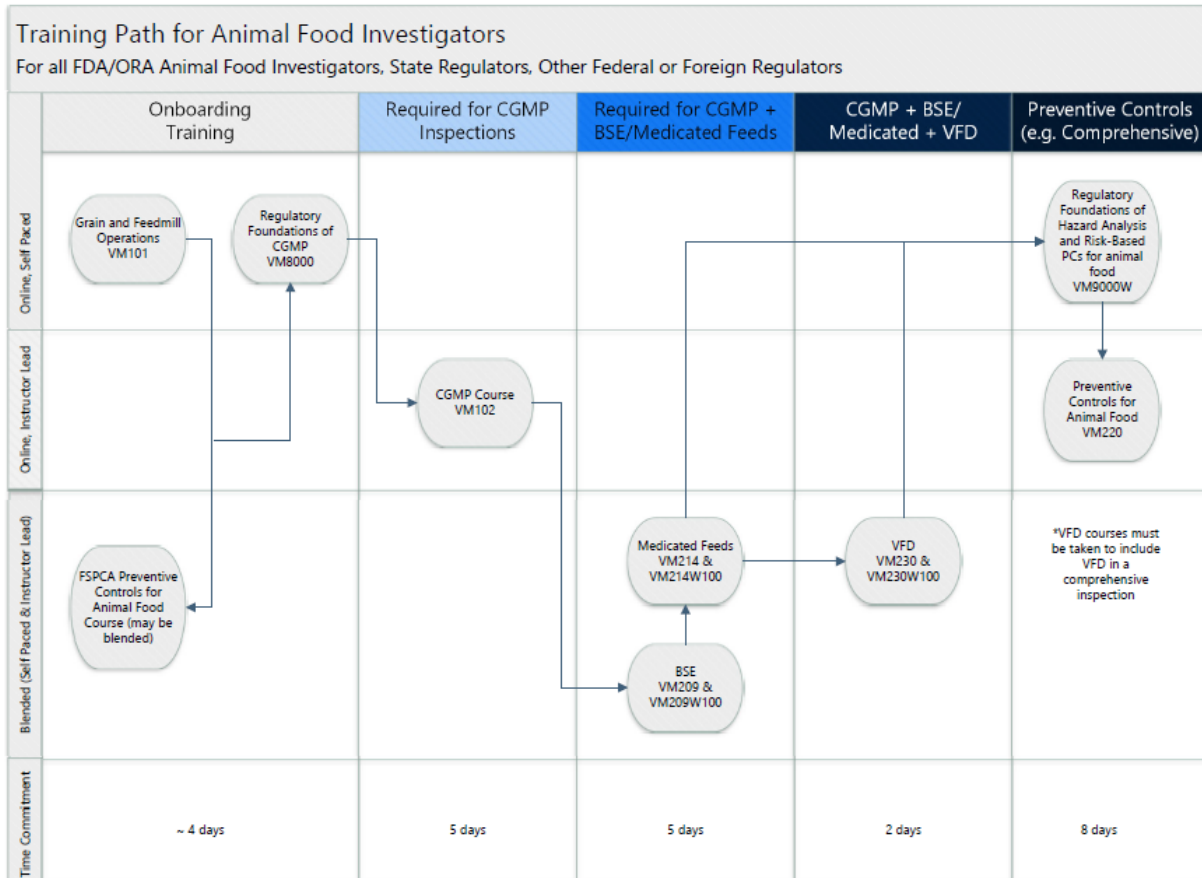
Traceback Investigations 4: Traceback of Eggs and other Commodities TI04 – FDA ComplianceWire

Traceback Investigations 5: Concluding the Investigations and Results TI05 – FDA ComplianceWire

Handling a Product Recall PHDV64 – FDA ComplianceWire

Complaints and Recalls VM6004K (video) – FDA LearnED

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



January 2023

## Feed and Feed Ingredient Manufacturing Committee Report

2023 AAFCO Annual Meeting

August 2, Baltimore, MD

### Committee Recommendations to Board and membership:

1. Committee recommends the Board of Directors disband the Nutrient Contaminant Workgroup or have the charge changed by the Board of Directors. It was discussed by the workgroup that they didn't want to re-invent the wheel. There is a lot of toxicology information out there and they were concerned that too much effort would be going into something that is already out there or taking place of contacting state veterinarian/toxicologist.
2. Committee recommends sending the edited Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients to the Board of Directors for review and recommend the updated guidelines be published in Chapter Five of the AAFCO OP, Model Guidance Documents, following the Analytical Variations (AV). Updated document attached.
3. Committee recommends sending the updated review of Chapter 5, pg. 258–263 of the 2023 AAFCO OP to the Board of Directors. All references to the VSIP were removed. Recommend changes to the next OP edit. Updated document attached.

### Committee Action Items:

1. FSMA Implementation Task Force – Working Group 3  
Coordination with LMSC has slightly changed the survey frequency. Proposed sending the survey out every other year.
2. Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections:  
Perform gap analysis of FSPCA training for inspectors to determine if AAFCO needs to provide additional training for state inspectors. It was proposed to change AITS reporting to Annual meeting after AITS. No report at Midyear meeting will be needed.

### Committee Participants

**Members Present:** Charlie Hubenka – NE; (Co-Chair); Ken Bowers – KS (Co-Chair); Eric Brady – TN; Laura Scott – CFIA; George Ferguson – NC; Dr. Jonathon Roberts – LA; Jessica Gore – NC; Trish Dunn – IN; Doug Lueders – Life Member; Justin Henson – FDA; Linda Morrison – Life Member; Chad Witmer – PA.

**Via Telephone:** None

**Advisors Present:** Pat Tovey – PFI; Louise Calderwood – AFIA; Charles Starkey - NARA; Matt Frederking – NGFA; James Emerson – US Poultry Association; Dan Frank – AFIA; Bill Bookout – APPA.

### Committee Report

Ken Bowers called the meeting to order 2:20 pm. Members and advisors in the room introduced themselves.

**Introductions and Agenda Review, Ken Bowers, and Charles Hubenka**

**NEW MEMBERS:** None

### Review of Action Items

#### Mineral Guidelines Working Group – Brady

This was finalized and approved during business meeting of Annual Meeting in August 2022.

#### FSMA IMPLEMENTATION TASK FORCE UPDATES

#### Working Group #3 – Contaminant and Hazard Lab Strategy - Brady

*Working Group Charge: Following the identification of contaminants and hazards by FSPCA/FDA, the group will determine action levels and enforcement strategies to provide guidance to the Lab Methods and Services Committee (LMSC) to develop a priority list of method development. This Working Group will work in consultation with the FSPCA, Enforcement Issues Committee, Inspection & Sampling Committee, Ingredient Definition Committee and the LMSC*

#### Update on Contaminant and Hazard Lab Strategy

Communication with the Chairs of LMSC. LMSC has workgroups to address the methods and training needs returned by the survey.

The top 5 needs are:

1. Vitamins and Vet Drugs  
Vitamin D – Vitamin A – Vitamin E – Monensin – Lasolacid
2. Microbial Pathogens  
Salmonella – Listeria
3. Drug Residues  
Monensin – Lasolacid
4. Poisons/Toxins  
Mycotoxins – Pentobarbital – Dioxins
5. Pesticide Residues  
None Listed - Only performed on complaint basis.

#### AAFCO Regulatory Needs Yearly Survey

Coordination with LMSC has slightly changed the survey frequency. Instead of death by survey, we propose sending the survey out every other year, due to the fact that regulatory needs do not typically change annually.

#### **Working Group #4 – Inspector Training for Ingredient Manufacturing Inspections - Brady**

*Working Group Charge: Review materials developed by FSPCA and FDA to determine whether training material for feed ingredient manufacturing from the FSPCA will meet the needs of Inspectors in regard to training. Working group will work in consultation with the Education & Training Committee and the Inspection & Sampling Committee.*

Brady - AITS 2023 update.

The seminar was held last month, June 13-15, in Denver, CO. We had 39 attendees, representing 14 states, Arizona, Arkansas, Colorado, Georgia, Indiana, Kentucky, Maryland, Michigan, North Carolina, Nebraska, New Mexico, Ohio, Pennsylvania, and Tennessee. Cadre included Miriam Johnson, Chad Linton, Jamie Spencer, Jordan Mancini, Austin Therrell, and Eric Brady.

Training was conducted on topics that included Feed Stuffs, General Feed Manufacturing, cGMPs and Records Review, Advanced Feed Labeling, Veterinary Feed Directive Traceback and Trace forward, Ingredient Verification Tool and Ingredient Traceback, Medicated Feed Labeling Requirements and Drug Calculations, Aseptic Sampling, with the final day consisting of training led by the Council on Licensure, Enforcement, and Regulation.

AITs for 2024 will again be held in Denver, CO and is currently being scheduled for the week of June 10-14.

It was proposed to change AITS reporting to Annual meeting after AITS. No report at Midyear meeting will be needed.

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

- The CFIA is continuing to work towards final publication of updated Canadian Feeds Regulations, with a target of Summer 2023.
- When the updated regulations are published some of the changes will come into effect right away, while others will be delayed.
- Changes respecting labelling, standards and product registration will come into effect immediately, but will have a one-year transition period that will allow regulated parties to follow either the old rules or the new ones.
- New requirements with respect to hazard analysis and preventive control plans will come into effect one year after publication of the regulations.
- New requirements with respect to licences will come into effect 18 months after publication of the regulations.
- The CFIA is preparing guidance and planning outreach activities to help support regulated parties with the updated regulations.
- The CFIA has also been working on a number of other activities



- The MyCFIA application portal has been fully launched. Applications for feed registration and approval can now be made on-line. Companies are encouraged to submit their applications here.
- A database of registered products is in development and will be available on the web
- Updated guidance on acid-based products and new guidance on data flexibility are available on the CFIA website.

### Industry updates

Pat Tovey PFI

- PFI has been discussing the possibility of changes to the regulatory environment.
- PFI is hosting the Global Alliance in Minneapolis, MN June 20-24, 2024. IPPE - Will be hosting training along with sister associations, aiming to assist farms to generate USDA/APHIS inspection packages for trade.
- Nutrition subcommittee has drafted a manuscript entitled Challenging and Establishing Mineral Requirements in Dogs. Work addresses challenges regarding copper levels.
- Product safety regarding weather related concerns-mycotoxins in grains. Expanding to include more mycotoxins.

Louise Calderwood AFIA

- Recently published animal feed economic report on AFIA.org. Breaks all the economics down to the congressional level.
- Animal feed additives. Work has been done by FDA CVM to create new category of zootechnical animal food substances. These are non-nutritive substances that would have to ability to make marketing claims. Update next year.

Dave Fairfield NGFA

- Food Safety Preventive Controls Alliance – Standardized curriculum status. 2017 curriculum is current for animal food. FSPC is working towards providing additional resources to help instructors better describe enforcement discretion policies for the animal food rule. FSPC annual conference will be in Chicago Oct 17 and 18th, 2023. Lead instructor course will be offered Nov 28–30.
- PCQI courses are still being offered.

Charles Starkey NARA

- Well attended PCQI class with renderers.
- Annual convention in October.
- Fats and Proteins research foundation to fund additional work on heat sensitive pathogens to promote continued food safety.

### Other Business:

#### Nutrient Contaminant Workgroup

Committee recommends the workgroup be disbanded.

The board in 2021 charged FFIM to put together some model contaminants and hazards so this workgroup was formed. Workgroup met 3 or 4 times and started with nutrients that if used at an excess of normal use level could be considered hazardous. They identified some nutrients that were tied to recalls. That's as far as the workgroup has gotten.

Tovey – Concerned that too much effort would be going into something that is already out there or taking place of contacting state veterinarian/toxicologist. Is there merit to going forward with this workgroup? Industry seemed to not see the value.

Therrell – A focus around the workgroup was they didn't want to re-invent the wheel. There is a lot of toxicology information out there. Wanted to try and get this information in one spot for convenience. Committee needs to decide whether to continue.

**Consideration to review the voluntary self-inspection program in Section 5 of the OP.** Eric Brady moved to accept the workgroup report from the VSIP workgroup. Jessica Gore seconds. Motion carries.

Committee recommends sending the updated review of Chapter 5, pg. 258 – 263 of the 2023 AAFCO OP to the Board of Directors. All references to the VSIP were removed. Recommend including changes to the next OP edit.

Workgroup disbanded.

**NEW BUSINESS**

**Edits in OP to Official Guidelines for Contaminants Levels Permitted in Mineral Feed Ingredients.**

Jennifer Kormos. Formed a work group to go over document to edit for clarity, not change content. Trish Dunn-IN, Cynthia Scholte-CVM, and Kevin Meyer-Intrepid Potash. Task completed. It was decided that these were still editorial changes and wouldn't need to go back through the membership. Recommend sending to the board and on to include the edits in the next OP update. Eric Brady-TN moved to accept the workgroup report and to move on to the AAFCO Board of Directors for placement in the OP. Trish Dunn-ID seconds. Motion carries. Jennifer to change Table 4 (mtl) before sending the final report. Work group disbanded.

**Strategic Plan assignment for 2023 – 2025.** Discussion/workgroups. EIC, Feed labeling and FFIM committees have formed a workgroup to address Chapter 5 edits.

3.1 Chairs from FFIMC, ISC, and EC will go through and align Chapter 5 with AFRPS. Once tasks are figured out Committee chairs will bring back assignments for workgroups.

3.2 Coordination with LMSC has slightly changed the survey frequency. LMSC and FFIMC has proposed sending the survey out every other year, due to the fact that regulatory needs do not typically change annually.

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing / Status</b>
Mineral Guidelines Working Group	Mineral Guidelines	To review and revise the "Official Guidelines for Contaminant Levels Permitted in Mineral Feed Ingredients". Working Group: Bill Burkholder (lead)	<b>Approved</b>
FSMA Implementation Task Force – Working Group 3	Hazard & Contaminant Action Levels and Lab and Enforcement Strategies	Work with FSPCA, EIC, ISC, IDC and LMSC to develop a prioritized list of method development once list of contaminants and hazards has been identified by the FSPCA and FDA. A plan of action should be created by the working group to determine the processes of implementing the decision making and method development.	Update: August 2024
FSMA Implementation Task Force – Working Group 4	Inspector Training Development	Gap Analysis performed on FSCPA training to determine if there is any missing education that should be provided to inspectors who perform feed ingredient manufacturing inspections	Update: August 2024

**Meeting Adjourned.**

**Attachment A: VSIP Workgroup**

<https://www.aafco.org/wp-content/uploads/2023/10/5.-FFIM-Minutes.pdf>



## Ingredient Definitions Committee Report

2023 AAFCO Annual Meeting

July 31, Baltimore, MD

August 1, 9:00–10:00 am EDT, Baltimore, MD

### Committee Recommendations

- Tentative definition T71.41 LG HEAR Meal to OFFICIAL status (see Attachment A)
- Tentative definition T36.11a Dried \_\_\_\_\_ Fermentation Products to OFFICIAL status (see Attachment B)
- New TENTATIVE definition T51.17 Clam Meal (see Attachment C)
- New TENTATIVE definition T60.119 Dried Cricket (see Attachment D)
- New TENTATIVE definition T40.113 Dried Recovered Household Food (see Attachment E)
- New GRAS Table 101.1 addition AGRN 55 Phytase (see Attachment F)
- New GRAS Table 101.1 addition AGRN 45 Succinivibrio dextrinosolvens (see Attachment G)
- Revise Table 101.1 Section Header in the OP by inserting the following language at the end of the current section 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.”*
- Publish Common Food Index list of items on the AAFCO website and insert into the ODI. (see Attachment H) (No membership vote needed per CFI procedures)

**Board Recommendations:** None

### Committee Participants

**Members Present at Roll Call 7/31/23:** Erin Bubb, Richard TenEyck, Laura Scott, Charlotte Conway, Ken Bowers, Dave Husner, Janes Embry, Falina Hutchinson, Maggie Faba, Ashlee-Rose Ferguson, Katie Simpson, George Ferguson, Darrell Johnson, Dan King, Mark LeBlanc, JoLynn Otero, Nathan Price, Cory Skier, David Snell, Kimberly Truett, Patricia Dunn, Bailey Whiten, Kent Kitade, Bernadette Mundo, Marissa Kost

**Members Present at Roll Call 8/1/23:** Erin Bubb, Richard TenEyck, Laura Scott, Charlotte Conway, Ken Bowers, Dave Husner, Janes Embry, Falina Hutchinson, Maggie Faba, Ashlee-Rose Ferguson, Katie Simpson, George Ferguson, Darrell Johnson, Dan King, Mark LeBlanc, JoLynn Otero, Cory Skier, David Snell, Patricia Dunn, Bailey Whiten, Kent Kitade, Bernadette Mundo, Marissa Kost

### Committee Report

SESSION 1 Convenes with 25 out of 31 voting members present for roll call on 7/31/23. Quorum is established.

- 1) LG HEAR Meal (T71.41) to Official- (5) Falina Hutchinson  
**Falina Hutchinson moves to accept. George Ferguson seconds. Motion passes.**
- 2) Dried \_\_\_\_\_ Fermentation Products (T36.11a) to Official- (5) Maggie Faba  
**Maggie Faba moves to accept. Mark LeBlanc second. Motion carries.**
- 3) New Tentative Definition (T51.17) Clam Meal-(5) Justin Hill  
**Justin Hill moves to accept. Falina Hutchinson second. Motion carries.**  
Discussion: AFIA asked for clarification that the species included in the definition were only included because that was what was submitted. Justin Hill confirmed this is correct.
- 4) New Tentative Definition (T60.119) Dried Cricket- (5) Erin Bubb  
**Erin Bubb moves to accept. George Ferguson second. Discussion**  
Discussion: Dave Husner asked for clarification on the terms dehydrated and roasted and had concerns regarding how this proposed definition might affect crickets that are sold to feed reptiles. Roasted and dehydrated are defined in the OP. David Dzanis and Kristi Smedley both expressed that dried crickets have been used in specialty pets for a very long time and feels that this issue will continue to be raised with each insect that is defined. There should be some enforcement discretion for the specialty pet food. There was discussion that an SUIP such as

was done for wild bird feed should be considered. Erin Bubb proposed to put this discussion in parking lot for discussion on insects that are used for specialty pet foods (such as reptiles) at another meeting.

Good feeding practices – no limit is established but producer needs to understand how to feed it to the animals.

Dave Husner asked if we could remove adult dog food and FDA responded that the safety data that was provided was only for adult dogs.

There was a suggestion to insert “for use in pet food” in the definition, which would then exclude specialty pets, poultry, etc. and allow for use in dog food.

**Richard Ten Eyck moves to table. Dave Husner seconded. Motion fails.**

Discussion: Aaron Hobbs, representing the NACIA, would like to see this move forward. There has been a lot of work done to support this use in adult dog food and should not be held up in the discussion of how to handle insects in specialty/exotic pet food.

**Erin Bubb moves to accept Dried Cricket as a tentative definition. George Ferguson second. Motion carries.**

- 5) AGRN-55 Phytase (GRAS table 101)- (5) Nathan Price

**Nathan Price moves to accept. Falina Hutchinson second. Motion carries.**

- 6) AGRN-45 Succinivibrio dextrinosolvens Fermentation Product (GRAS table 101)- (5) Nathan Price

**Nathan Price moves to accept. Falina Hutchinson second. Motion carries.**

- 7) 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 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.”**

**Nathan Price moves to accept. Dave Husner second. Motion carries.**

Discussion: George Ferguson would like clarification on where it will be placed. Erin Bubb clarified that this would be added to the end of the current section header as found in the 2023 Official Publication on page 535 prior to Table 101.1.

- 8) Common Food Index recommendations -(50) CFI Subcommittee

**Mark LeBlanc moves to accept the subcommittee report. Richard Ten Eyck second. Motion carries.**

**Mark LeBlanc moves to accept CFI list and to publish it on the AAFCO website and have it added to ODI. George Ferguson seconds. Motion carries.**

Discussion: There was discussion if minimally processed ingredients such as pomace can be included. Items can be submitted for consideration to be added to the CFI. However, it was pointed out that pomaces are not minimally processed; they are fractions and likely would not be included in the CFI.

Richard Ten Eyck asked for this initial list of common foods, where would an investigator look for the safety evaluation. Erin Bubb stated that based on the established CFI guidelines in the Official Publication, the manufacturer is responsible to determine the safety. Therefore, the manufacturer is responsible to ensure that the ingredient has been prepared properly and is being used at the level appropriate for the target animal.

Correction to list: Sugar (from sucrose) should be sugar (sucrose). Note: The parenthetical does not need to be included in the ingredient list on a label.

It is noted that kiwi listed is the fruit not the bird.

AFIA asked if there is a way to include that the CFI is not a naming convention. Erin Bubb stated that the subcommittee will evaluate and see if clarification can/should be added to the guidelines or in appropriate header on the AAFCO website where the CFI list will be posted.

George Ferguson is the CFI coordinator and will be coordinating the submission portal development.

- 9) Review \*Parking Lot- (10) Erin Bubb

#### Parking Lot Topics

- a. ODI Subcommittee process of building an excel file of ODI changes. Tech Committee- George?  
This is mostly ready to go. The technology is completed but it needs to be implemented. Next step, George Ferguson needs training on uploading to ODI and investigators need to be trained on how to fill out the form.
- b. ODI procedures: The procedures are in the BIN and are ready for the investigators to pilot. See update in a. above.
- c. NANP Subcommittee report –have not met -**Ashley Shaw /KC**
  - The subcommittee has not met in a long time (3 yrs.)
  - **Richard Ten Eyck moves to disband the workgroup. Charlotte Conway seconds. Motion carries.**
- 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**
  - There was still a component to make sure that it was tested and implemented.
  - **Richard Ten Eyck moves to strike from parking lot, as completed. Dave Husner second. Motion carries.**
- e. Pursue formal MSBC Definition. Nothing in motion
  - Agreed to keep in the parking lot.
- f. New feed terms: Total Mixed Ration, Raw, Fresh, Pasteurized- **Ali Kashani**
  - No update
- g. MBRC will be requesting new feed terms for Ash, Acid Insoluble Ash, Air Ashed, Sulfated Ash and Rawhide (part) – **NEED UPDATE from MBRC**
  - To be discussed in MBRC tomorrow.
- h. Proper use of process terms. **Ali Kashani and WG to present**
  - Erin Bubb will discuss with Ali Kashani.
- i. Spent Bleaching Clay Workgroup
  - See discussion from Day 2 with WG update
- j. Next IDC speaker/presenter? Suggestions: “Pre, Pro and Postbiotics”
  - Possible panel discussion at January meeting. Maggie Faba, Erin Bubb, and CVM to look into this more. Stay tuned.

**Richard Ten Eyck moves to recess. George Ferguson seconds. Motion carries** (at 3:30 pm July 31, 2023).

Day 2- 8/1/23 9:00-10:30

**SESSION 2 Convenes with 23 out of 31 voting members present for roll call on 8/1/23. Quorum is established.**

- 10) Common Food Index recommendations- (20) if needed, continued from Session 1)  
The Common Food Index was concluded in Session 1.
- 11) 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 Anticipating modifications when the new MOU is signed, AAFCO Ingredient Definition submissions will have a publicly available queue, which will also help to increase efficiency from time of submission to official. It is anticipated that there will be a set period of time to comment on the ingredient (60 or 90 days). Tentative definitions were started at a time when there was only a printed version of the Official Publication. With a publicly available queue, it could be possible to have comments on proposed ingredients earlier in the process without the need for tentative status. It might allow for time efficiency (6-8 months) from submission to final definition. The workgroup will begin meeting in August and will likely need 2-3 meeting to establish criteria. The next update will be at October IDC meeting. The workgroup would like plan in place before MOU

is out and understands that the plan will need to be reviewed and updated to align with the final MOU.

FDA – questions asked from FDA/AFFCO public meeting can be used as a framework for the workgroup to utilize. FDA is evaluating how FDA's part in the Ingredient Definition submission process can be more transparent.

Comment was made by committee advisor that this new process with public comment can unintentionally delay the process, so that must be taken into consideration with anticipated timelines.

- 12) "Fish" Definition Update- (5) Justin Hill  
It was asked for more input on the definition for discussion at the October meeting.
- 13) SUIP 6 "Spent Bleaching Clay" to Technical Additive Table update- (5) David Snell  
Presuming that the SUIP is removed looking for the correct home for the spent bleaching clay. The Technical Additive Table may not be the correct place. Looking to have an update in October. If you are interested in joining the WG please reach out to David Snell as he will be forming the WG.
- 14) Common Food Index- External Submission Portal update- (10) CFI Subcommittee  
Update from Technology committee – received request to develop in SharePoint. The vendor has been selected for set up. George Ferguson and the vendor are meeting next Tuesday for kickoff meeting. It is anticipated that submissions will have to go through the currently available submission process (form) until the official portal is available. The automated process still being worked on – will capture comments and review -- historical tracking of the common food submission. Another update will be given at the October meeting.  
The submission portal is essential to have. George Ferguson is working with FASS to have the submission form QR code will be available on AAFCO website until the portal is ready.  
\*Note: Communication will be key and should be part of the system and plan.
- 15) Speakers: Dr. Geoff Hill and Azita Sayadi from Mill- Dried Recovered Household Food (Presentation 10:00-10:30 am)
- 16) **New Tentative Definition** (T40.113) Dried Recovered Household Food- (5) David Husner  
Discussion: The definition is non-proprietary but is based on the data and information provided to support the definition. The many concerns that were raised during the Q&A portion of the presentation have also been discussed while reviewing and preparing the definition. There is concern that the definition is limited to drying the food at home. If someone has a business plan where the food is picked up, and dried off site, FDA would want to understand the food safety plan and could offer an amendment to the definition as needed to expand.  
There were questions related to GMPs (507 supplier). There are many safeguards in place in the definition. Additionally, the firm will know what households have contributed to a lot, which is similar to a feed mill.  
**David Husner moves to accept. Richard Ten Eyck seconds. Motion carries.**  
Discussion: Question asked, "Is there any reason why there is no guarantee for protein and fat?" Moisture was the most important to guarantee for food safety. There are other recovered food definitions that are similar. The statement of good feeding practices also helps to ensure that protein and fat are acceptable.
- 17) Investigators needed:  
Amino Acids  
Fermentation Products (Maggie Faba)  
DFM (Maggie Faba)  
Yeast  
Additives  
Special Purpose Products  
Preservatives
- 18) Next Meeting: Virtual- October (27) 2023

**Meeting adjourned at 10:30**

\*\*\*\*\*

Speaker Bios:

*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 CO<sub>2</sub> 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.*



## Attachment A: LG HEAR Meal, Mechanically Extracted

**71.41 Low Glucosinolate High Erucic Acid Rapeseed Meal, Mechanically Extracted,\*\*** is the meal obtained after the removal of most of the oil by mechanical extraction of whole seeds obtained from the genus *Brassica* [*Brassica napus*, *Brassica rapa*, or *Brassica juncea*] from which the oil shall contain more than 2% erucic acid and the solid component shall contain less than 30 micromoles of any one or any mixture of 3-butenyl glucosinolate, 4-pentenyl glucosinolate, 2-hydroxy-3-butenyl glucosinolate, 2-hydroxy-4-pentenyl glucosinolate, and allyl glucosinolate per gram of air dry, oil free solid. When produced from *Brassica juncea* it must also contain less than 5 micromoles of allyl glucosinolates per gram of air dry, oil free solid. It must contain a maximum of 6% erucic acid, a maximum of 12% crude fiber, and a maximum of 30 micromoles of glucosinolates per gram. It is used in the diets of animals as a source of protein, not to exceed a 5% inclusion rate.

## Attachment B: Dried \_\_\_\_\_ Fermentation Product

Proposed Revised Ingredient Definition (inserted text is underlined):

**T36.11a Dried \_\_\_\_\_ Fermentation Product** is the product derived by culturing on appropriate nutrient media for the production of one or more of the following: enzymes, fermentation substances, or other microbial metabolites, and dried in accordance with approved methods and good manufacturing practices. Protein, amino acids, fat, fiber, cell count, enzyme activity or nutrient metabolite level shall be guaranteed where applicable. Use of *Lactobacillus buchneri*, *Lactobacillus diolivorans*, and *Lentilactobacillus hilgardii* is limited to silage and high moisture corn grain in plant inoculant products. [For label identification the source must be indicated such as *Bacillus subtilis*, *Aspergillus oryzae*, *Aspergillus niger*, *Lactobacillus acidophilus*, *Lactobacillus buchneri*, *Lactobacillus diolivorans*, *Lentilactobacillus hilgardii*, *Lactobacillus delbrueckii* or *Enterococcus faecium*, or as permitted by FDA.] (Proposed 1976, Adopted 1983, Amended 1997, Amended 1999, Amended 2001, Adopted 2003, Amended 2010, Adopted 2014 rev.1, Amended 2022)

## Attachment C: Clam Meal

Proposed tentative definition

**T51.17 Clam Meal** is the undecomposed, dried byproducts from shucking and processing operations of *Spisula solidissima* and/or *Arctica islandica*. The ingredient is derived from all or part of the meat, liquid and viscera of the clam. It must contain not less than 60% crude protein and not more than 12% moisture. It is for use in non-salmonid finfish feed as a source of protein consistent with good feeding practices.

## Attachment D: Dried Crickets

Proposed tentative definition

**Dried Crickets** are nymph through adult stage crickets, *Acheta domesticus*, manufactured either by roasting or wet milling. Crickets are raised on feedstock composed exclusively of feed grade materials. Post-harvest processing of crickets shall incorporate a microbial kill step. The ingredient must be labelled with guarantees for minimum crude protein and minimum crude fat on an as-fed basis. The ingredient is dried to no more than 6% moisture. The ingredient must contain no more than 7.5% chitin.<sup>1</sup> It is for use in adult dog food as a source of protein and fat consistent with good feeding practices.

## Attachment E: Human Food By-Products

Proposed tentative definition

**\*Dried Recovered Household Food** is composed of only non-spoiled materials originally intended for or derived from food for human consumption and collected from households. Materials are dried daily in the home to 12% or less moisture to enable safe storage and transport. These materials must be

safe and suitable for use in animal food. The materials shall be collected, evaluated, and further processed by the manufacturer to confirm that only acceptable materials have been added by households. To help ensure safety, a manufacturer of Dried Recovered Household Food must maintain a relationship with participating households to support training and accountability regarding acceptable material. Dried Recovered Household Food is intended for use in poultry diets in accordance with good feeding practices. The guaranteed analysis shall include the maximum moisture which shall be no more than 12%.

### Attachment F: Section 101 GRAS Notices addition AGRN 55 Phytase

Recommend to insert into OP 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)
55	BASF Enzymes LLC	Phytase enzyme produced by <i>Pseudomonas fluorescens</i> strain BD50104 expressing an altered appA 6-phytase gene from <i>Escherichia coli</i> strain K12	phytase	To increase the availability of phytin-bound phosphorus in poultry diets at 500-2,000 U/kg in complete feed	Poultry	1/20/22	<a href="#">FDA has no questions.</a> (PDF - 4 pages)

### Attachment G: Section 101 GRAS Notices addition AGRN 45 *Succinivibrio dextrinosolvens*

Recommend to insert into OP 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)
45 (PDF - 821 pages)	Native Microbials, Inc.	Dried fat encapsulated <i>Succinivibrio dextrinosolvens</i> strain ASCUSBF53 (NRRL B-67550)	<i>Succinivibrio dextrinosolvens</i> Fermentation Product	To be used as a viable microorganism in diets of beef cattle at an intended use rate of $1 \times 10^8$ colony forming units (CFU)/head/day.	Beef Cattle	3/16/21	<a href="#">FDA has no questions.</a> (PDF - 3 pages)

### Attachment H: Common Food Index

Common Food Index to be published on AAFCO.org

Acorn Squash	Lentil
Apple	Lima Bean
Apricot	Navy Bean

Asparagus	Nectarine
Banana	New Zealand Green Mussel
Black Bean	Niger Seed
Blackberry	Papaya
Black-Eyed Peas	Pea (Field Pea or Garden Pea variety )
Blueberry	Peach
Broccoli	Peanut
Buckwheat	Pear
Butter Bean	Pineapple
Cabbage	Pinto Bean
Carob	Plantain
Carrot	Plum
Cauliflower	Portabello Mushroom
Celery	Potato
Champignon Mushroom (AKA White Button)	Pumpkin
Cherry	Raspberry
Chickpea (AKA Garbanzo)	Red Beet
Coconut	Safflower Seed
Cranberry	Shiitake Mushroom
Cucumber	Snow Pea
Egg (from poultry)	Spelt
Fava Bean	Strawberry
Green Bean	Sugar (sucrose)
Honey	Sugar Beet
Kale	Sweet Potato
Kidney Bean	Tomato
Kiwi	Turnip
Lettuce	Watermelon
Mango	Yam
Millet	Yellow Squash
Mulberry	Zucchini

\*CFI is not a naming or quality standard.

\*The parenthetical citation offers further clarity. It is not meant as part of the name.

The full report is available at <https://www.aafco.org/wp-content/uploads/2023/10/6.-IDC-Minutes.pdf>



## Inspection and Sampling Committee Report

2023 AAFCO Annual Meeting  
July 31, 3:45–4:45 pm EDT, Baltimore, MD

**Committee Recommendations:** None

**Board Recommendations:** None

### Committee Participants

**Members Present:** Chad Linton (WV), Jamie Spencer (KS), Jessica Gore (NC), Jenny Combs (KY), Lloyd Payne (CVM), Joseph Haynes (FDA/ORR), Laura Scott (CFIA), Blythe Freihage (MO), Madison Phillips (TN), Daniel Zangari (CO), Blaine Brown (IN), Jim True (KY)

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

**Virtual Attendees:** Tim Lyons (MI)

### Committee Report

#### Committee Activities

Chad Linton (Co-Chair) and Jamie Spencer (Co-Chair) are working to establish the working groups and charges from the committee with the replacement of Miriam Johnson as chair. Electronic meetings will be held in the future before the mid-year meeting to establish what is to be completed and what members are expected to work on these work groups.

Chad Linton was asked by the BOD to discuss with the committee about keeping or replacing CLEAR group at the AITS training. A discussion will be completed electronically before the next meeting, a decision will be made before the next contract will be renewed.

#### Subcommittee Activities

BITS cadre members are working on the replacing Miriam Johnson on the agenda with Blaine Brown, Chad Linton, and Eric Brady. All presentations will be converted to the AAFCO templates and sent to FASS for distribution and printing before

A workgroup (sub-committee) was formed to review the AAFCO Inspectors Manual for any updates.

The workgroup committee members are Chad Linton, Jamie Spencer, Jessica Gore, Jim True, Blythe Freihage, Blaine Brown, Daniel Zangari. A survey for a meeting time will be sent to the workgroup to begin work and report back to the committee.

#### Committee Minutes

Co-Chair Chad Linton called the meeting to order at 3:45 pm. He introduced the new Co-Chair, Jamie Spencer, with the recent departure of the former Chair, Miriam Johnson. A roll call member sign in sheet was circulated for all members and advisors to attend. We have two new members join the committee, Katie Laney, NM, and Jordyn Johnston, WI.

Jessica Gore, NC, gave an update on the Advanced Inspectors Training Seminar in Denver, CO in June 13-15, 2023. We had 39 attendees, representing 14 states, Arizona, Arkansas, Colorado, Georgia, Indiana, Kentucky, Maryland, Michigan, North Carolina, Nebraska, New Mexico, Ohio, Pennsylvania, and Tennessee. Our cadre included Miriam Johnson, Chad Linton, Jamie Spencer, Jordan Mancini, Austin Therrell, and Jessica Gore. Training was conducted on topics that included Feed Stuffs, General Feed Manufacturing, cGMPs and Records Review, Advanced Feed Labeling, Veterinary Feed Directive Traceback and Traceforward, Ingredient Verification Tool and Ingredient Traceback, Medicated Feed Labeling Requirements and Drug Calculations, Aseptic Sampling, with the final day consisting of training led by the Council on Licensure, Enforcement, and Regulation.

AITS for 2024 will again be held in Denver, CO, and is currently being scheduled for the week of June 10-14. The cadre will discuss the use of CLEAR in future meetings moving forward, and a meeting of the cadre and committee members will be scheduled to discuss this matter.

Chad Linton, WV, gave an update on the Basic Inspectors Training Seminar to be held in Sacramento, CA, on September 18-22, 2023. Registration is to be opened soon on the AAFCO and AAPFCO website. All meeting attendees were encouraged to send as many inspectors as they need trained. The cadre has

been set and all presentations are being prepared and sent to AAFCO for final edits and printing of materials.

Jamie Spencer, KS, spoke on the progress of the Bulk Tote Sample study RFP. A draft copy of the RFP has been started and he is asking for more members to join the workgroup. Chad Linton and Blaine Brown have joined the workgroup. A survey will be sent out to the group to determine the best time for a meeting of the workgroup. If a draft RFP is made, it will be sent to the committee for review and then forwarded to the board of directors. Workgroup members Jamie Spencer, Chad Linton, Blythe Freihage, Stephanie Adams, and Jim True.

An update from the Bagged Probe Sampling Study was given by Jenny Combs, KY, as the final document is scheduled to be finished, published, and sent to the committee by Fall 2023.

Ashlee-Rose Ferguson, WA, discussed the Inspector Guidance Tool for PC and cGMP Inspections. The workgroup is continuing to work on a one stop shopping tool that can be used by AAFCO membership, be housed in a common place for membership, and all members have access to the document. With the prior lead of the workgroup leaving, Chad Linton, WV, has volunteered to lead the workgroup to allow the group to work on this project. A survey for a meeting time will be sent to the workgroup to keep the workflow moving and continue to work on the project.

Jamie Spencer, KS, gave an update on the AAFCO Branded Sampling Equipment, with the making and presentation of a ¾ inch trier being made as a model of what the committee is wanting to make first for the committee. Jamie stated that this trier would be the beginning tool that we use for AAFCO Branding, make all members using the same sampling tool, and make it available for all to purchase including industry. Jamie asked for suggestions to improve the current model that was presented to the committee. Suggestions were being made to possibly change the length of the probe to allow the sampling of larger bags, cap the handles, make a stamp the AAFCO name and logo on the trier to make it branded for AAFCO. The group discussed what other sampling tools we would like to be made next after this trier. The committee will make this working model trier correct and what we feel is needed, and then look at making another sampling tool for AAFCO Branding, possibly a stream cutting cup. Jamie will continue to work with the machine shop to modify any changes and report back to the committee at the midyear meeting. Workgroup members Jamie Spencer, Ethan Willis, Daniel Zangari, David Husner, Jim True, Al Harrison, and Jan Campbell.

A workgroup (sub-committee) was formed to review the AAFCO Inspectors Manual for any updates. The workgroup committee members are Chad Linton, Jamie Spencer, Jessica Gore, Jim True, Blythe Freihage, Blaine Brown, Daniel Zangari. A survey for a meeting time will be sent to the workgroup to begin work and report back to the committee.

A workgroup (sub-committee) was formed to begin developing an Aseptic Sampling guidance for training. When the guidance is developed it will be sent to Education and Training Committee for developing a training. The members of the work group are Chad Linton, Jessica Gore, and Jamie Spencer. A survey for a meeting time will be sent to the workgroup to begin work on the guidance.

A workgroup (sub-committee) was formed to work on developing a Chain of Custody guidance for the AAFCO Inspectors Manual. The workgroup committee members are Chad Linton, Jamie Spencer, and Jim True. A survey for a meeting time will be sent to the workgroup to begin work on the guidance. When a working draft is completed, it will be sent to the committee for review.

A discussion about a possible inspector certification was discussed. ISC is to 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. Chad Linton will start the process for the committee.

Meeting adjourned 4:45 PM.

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing / Status</b>
AITS Cadre	Adv Insp Training Seminar	Complete Training	June 2024
BITS Cadre	Basic Insp Training Sem	Complete Training	September 2023
Bulk Tote Sampling WG	RFP	Complete RFP	August 2024
Bagged Probe Study	Fullfill RFP	Release Published Info	Fall 2023
Inspector Guidance Tool WG	Complete and publish	Complete Guidance	August 2024
AAFCO Branded Tool WG	Make an approved tool	Complete tool	August 2024

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing / Status</b>
Aseptic Sampling WG	Guidance	Completed send to EDC	August 2024
AAFCO Manual Update WG	Update	Update and Review	August 2024
Chain of Custody WG	Guidance	Complete Guidance	August 2024
ISC Committee	Inspector Certification	Meet with LMSC	August 2024

**Feed Labeling Committee Report**  
2023 AAFCO Annual Meeting  
August 1, 2023, 8:00 – 9:00 am EDT, Baltimore, MD

**Committee Recommendations:**

- Update Feed Labeling Guide in the OP to include the “Your Pasture Horse Mineral.”
- Request Ingredient Definition Committee review the caution statement in the definition for Ammonium Chloride. The current language is confusing and doesn’t make sense that it would be word for word. If a feed is labeled for a specific species, then that caution statement should read for that species only. (FL to give this directly to IDC)
- Request Model Bills and Regulations Committee insert unique identifier language into the model bill and model regulations. v(FL to give this directly to MBRC)

**Board Recommendations:** None

**Committee Participants**

**Members Present:** David Husner (PA), Jamie Good (ND), Erin Bubb (PA), Liz Beckman(WA), George Ferguson (NC), Dragan Momcilovic (FDA), Jamie Spencer (KS), Jordan Mancini (MN), Adam Orr (FDA), Justin Hill (NC), Bailey Whiten (GA), Lisa Fantelli (VT).

**Advisors Present:** Jan Campbell (NGFA), Meghan Dicks (AFIA), James Emerson(USPA), Emily Helmes (ETA), Chris Olinger (NGFA), Pat Tovey (PFI). Steve Younker(AFIA), Cathy Alinovi (NGPFMA), Bill Bookout (APPA), Charles Starkey (NARA), Patrick Fulling (PFI), Dave Dzanis (ACVM/APPA), and Renee Streeter (ACVM).

**Absent:** Mark Ashcroft (UT), Stevie Glaspie (MI), Kelly Younker (NM), Tom Phillips(MD), Ashley Shaw (FDA), Angie Simmons (GA), and Julia Fidenzio (APPA).

**Committee Report**

Meeting called to order at 8:00 AM EDT. A quorum for the meeting was established (12 of 19). Announcement was made acknowledging Jamie Good (ND) as a new co-chair of the committee and Patrick Fulling (PFI) and Renee Streeter (ACVM) as new advisors.

**Labeling of Products Containing Microorganisms**

As discussed during the 2023 AAFCO Mid-Year Meeting, it was requested the chair reach out to Laboratory Services Committee to determine if methods are available and validated to test for microorganisms and to report their recommendation back to the committee. Laboratory Services stated there are methods available. Furthermore, if Feed Labeling wishes to proceed with breaking out microorganism guarantees, they should go with Recommendation #3 of the workgroup.

- Only breakout microorganism to the genus level, not species.

A letter submitted to the committee by AFIA was displayed and summarized regarding their concerns with this topic.

- No validated method.
- Product is already misbranded if the microorganism is not found.
- Ingredient statement already lists organisms in order of predominance.
- Lack of harmonization of international standards.
- This change would be no benefit to consumers; and they are not advocating for this change.
- Currently, only claim allowed by FDA and state regulations is total microbial count.

Methods for Lactic Acid Bacteria, Yeast/Mold and Bacillus Bacteria received by Laboratory Services Committee were displayed. Dancia Wu clarified that some of the methods were validated for Lactic Acid and Yeast. Bacillus is not completely validated, though the method is good.

Emily Helmes: From industry perspective, there is an issue if the methods are not validated and verified for each matrix used. That has not been done. This would be a massive change to the DFM industry. When there are no methods verified, this needs further discussion before proceeding. The methods being shared were not seen for a while. Agree with AFIA’s letter.

Pat Tovey: Emily’s comments are spot on. There is a lot to consider with this. These organisms could also play a role in a firm’s food safety plan and hazard analysis.

Cathy Alinovi: Would disagree the consumers don't care about the microorganism breakdown. Looking towards the future, I recommend we take this as an opportunity for improving the methods.  
Meghan Dicks: The labels already list the microbials present in the product, however Cathy makes a good point about looking forward to the future, but let's start with working on validating methods.  
There was no further discussion on this topic, nor any motions from committee members.  
TOPIC DIES FOR LACK OF ACTION.  
ACTION: Committee chairs hereby disband this workgroup.

### **OP Edits Workgroup Update**

As per the request of the committee, FDA reviewed the labels to add to the Feed Labeling Guide within the OP. Upon review, they noticed the ingredient Ammonium Chloride requires a caution statement when used in a feed.

Richard Ten Eyck: The label for Goat Feed would be ok, because it isn't a concentrate, supplement or premix. The sheep feed would need to have the caution statement. Since it is in quotations, it needs to be verbatim.

MOTION: Jamie Spencer moves to accept the equine label. Jamie Good seconds. MOTION CARRIES.

MOTION: Jamie Spencer moves to table the goat feed as well as the sheep until we receive additional information about the quotations and what needs to be in the caution statement. Jamie Good seconds.

Adam Orr: Confused about what additional information is needed. The definition states what is required. This would require IDC to amend the definition.

Dragan Momcilovic: Concern related to use for medicated feed when ammonium chloride is present on the label. This language would be contradicting to the drug approvals.

Jan Campbell agrees with tabling to have further discussion.

Adam Orr: To keep this moving, tabling the motion would not be best. Feed Labeling can't move this forward. The point that Dragan was making with medicated feeds would be addressed in IDC.

Recommends moving this to IDC to modify the definition.

(Discussion ended with no amendments to the original motion.)

MOTION TO TABLE CARRIES.

MOTION: Adam Orr moves that IDC reviews the caution statement in the Ammonium Chloride definition for accuracy. Dragan Momcilovic seconds.

Jamie Spencer: Since it is in quotes, it must be that exact wording, however it makes it confusing. If a product is goat feed, it should say goat only, not cattle, sheep and goats.

David Husner: The motion is just for IDC to review the caution statement, not actually offering a recommendation.

Jamie Spencer: It would be good to include a note that says if a feed is labeled for a specific species, then that caution statement should read for that species only. This could be included in the remarks to IDC.

Paul Mostyn: Why not use the same statement that is used for Urea?

Jamie Good: That is a good point and one that has been discussed. Maybe this is something IDC could also consider.

(Discussion ended with no amendments to the original motion.)

MOTION CARRIES

### **Feed Labeling Workshop**

The workgroup was never formed to put together the workgroup. The content from the previous workshop still exists, thus it shouldn't be an issue to proceed with hosting the workshop.

David Husner will reach out to committee members and advisors to solicit volunteers to be on this workgroup.

### **Labeling Definition Workgroup**

A summary was provided on the charge given to the Feed Labeling Committee and Pet Food Committee by the AAFCO Board of Directors, requesting a combined workgroup be formed to review the definition of Labeling that was passed by Model Bills and Regulations Committee at the 2023 AAFCO Mid-Year meeting.

The representatives from Feed Labeling Committee are Tom Phillips, Jamie Spencer, James Emerson and Charles Starkey. Tom Phillips has agreed to lead the combined workgroup.



Representatives from the Pet Food Committee are Jo Lynn Otero, Kristen Green, Bill Bookout and Pat Tovey.

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

History was briefly discussed about the workgroup recommendations and how this topic was tabled at the 2023 AAFO Mid-Year Meeting to allow people additional time to think about the recommendation.

MOTION: Erin Bubb moves to remove the Unique Identifier recommendations from the table. Jamie Good seconds. MOTION PASSES.

The workgroup recommendations were reviewed as well as a brief overview of previous discussions. David Husner stated that conversation during this meeting was to provide new recommendations or thoughts about this topic and not to rehash previous discussion points.

Pat Tovey: There was concerns about semantics, such as naming and if this is different than the federal requirements. There was also an opinion submitted from AFIA, which he agrees with.

David Husner: Workgroup recommends this be added to the model bill for states to adopt into law. The committee could pursue this route and forward the recommendation to the Model Bills and Regulations Committee. Another avenue would be to forward this to Education and Training Committee to develop education and outreach materials to promote the use of lot numbers.

MOTION: Erin Bubb moves to accept Recommendation #1. Jamie Good seconds.

This creates a definition of lot number in the model bill. Modifies Section 5 of the model bill to add lot identifier to commercial feed labels and customer-formula labels. Adds to Regulation 2 in model regulations a lot identifier.

Adam Orr: Since states would not be automatically adopting this, the education piece would be a way of getting this information out.

David Husner: There will be a delay until states adopt this into their language.

Steve Younker: Including this as part of the labeling requirements isn't the right spot, because most people don't put the lot number on the label. With regards to doing recommendation #1 before proceeding to Recommendation #2 and #3 isn't necessary. They could separate items.

Richard Ten Eyck: Oregon put similar language in place 12 years ago and everything has been working fine. The difference is Oregon states you must state "lot number" on the label so it can clearly be seen.

Ashley-Rose Ferguson: Washington has this requirement as well.

Erin Bubb: Recommendation #1 states it could be on the label or labeling. There would be no difference having it on the container, which is part of the labeling. We see unique identifiers or lot codes stamped on bags.

MOTION CARRIES (10 Yea, 1 Nay).

MOTION: Erin Bubb MOVES to accept Recommendation #2 in the model bill. Jamie Good seconds. MOTION CARRIES.

MOTION: Erin Bubb MOVES to accept Recommendation #3 in the model bill. Jamie Good seconds.

George Ferguson: Recommendation #3 has several grammatical errors that need corrected.

Specifically (a) years is pluralized. There appears to be some language missing in (b)(4), because it doesn't make sense as currently displayed.

Jan Campbell: I believe it says to be as detailed as necessary to document the history of the work performed. We can go back and look at what was shared.

Jordan Macini: A lot of this was copied from Part 507, so that is likely what we should go with.

Meghan Dicks: The FSMA regulations state, "information adequate to identify the plant or facility the name and where necessary the location, the date and where appropriate the time. Instead of "document the history", it should read "document the activity".

David Husner: Can't locate the actual recommendation.

Richard Ten Eyck: If going back to the workgroup, recommend this align with FSMA so the record keeping requirements is two years.

David Husner: The record retention timeline was part of Recommendation #2, which already passed.

Erin Bubb: What is the outcome of the discussion? I think the 1 year doesn't need to align with FSMA. We need to clarify what (b)(4) is, however I would like to keep the motion going forward with the vote, with the understanding that (b)(4) be modified to what was actually in the workgroup report

Unknown: Could find some of the language in Part 225 for non-licensed medicated feed mills. That language looks very familiar to what (b)(4) is attempting to say.

Erin Bubb: For record, the missing word is probably provided, so it would say “to provide history”.

MOTION Carries

ACTION: Since this topic has been moved out of Feed Labeling Committee, the committee chairs hereby disband the Unique Identifier Workgroup.

**Meeting adjourned at 9:03 AM EDT**

**Action Item Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing / Status</b>
David Husner	Feed Labeling Guide in Official Publication	Send notification to BOD to update the Feed Labeling Guide in the Official Publication to include a label for “Your Pasture Horse Mineral”	September 2023
David Husner	Modify caution statement in definition of Ammonium Chloride	Submit recommendation to the BOD to have IDC review the caution statement in the definition of Ammonium Chloride	September 2023
David Husner	Feed Labeling Workshop	Form workgroup to develop a feed labeling workshop at 2024 Annual Meeting	August 2023
David Husner	Unique Identifiers on Labels and Labeling	Submit recommendation to the BOD to have MBRC add language to the model bills and model regulations to include unique identifiers	September 2023

## Inspection and Sampling Committee: Electronic Meeting Report

Electronic Committee Meeting  
August 31, 2023, 1:00 pm – 1:45 pm, TEAMS  
(DRAFT)

### Committee Recommendations

Motion was made by Eric Brady, TN, seconded by Jenny Combs, KY, to keep C.L.E.A.R. at the AITS training in the future. The motion passed unanimously.

The committee will work with the AITS Cadre to review the contract with the CLEAR company to make sure that all points of the contract are being met, and completing a survey each year to identify any problems or allow the opportunity to let us know that CLEAR is fulfilling the contract to our specifications. Additions and updates to ISC Workgroups. Current lists now available. (see below)

### Board Recommendations: None

### Committee Participants

**Members Present:** Chad Linton (WV), Jamie Spencer (KS), Jessica Gore (NC), Jenny Combs (KY), Lloyd Payne (CVM), Laura Scott (CFIA), Madison Phillips (TN), Blaine Brown (IN), Jim True (KY), David Husner (PA), Tim Lyons (MI), Stevie Glaspie (MI), Mark Glover (FDA), Jennifer Godwin (FDA), Madison Phillips (TN), Eric Brady (TN), Samantha Moran (CA), Barb Schroeder (MN), Caroline Wilkinson (VA)

**Advisors Present:** Chris Olinger (NGFA), Felicity Stewart (PFI)

### Committee Report

Meeting called to order at 1:00 pm by Chad Linton- Co-chair. Roll Call was taken, majority of members present to vote.

Motion was made by Tim Lyons to accept the minutes of the Annual Meeting in Baltimore. Seconded by Laura Scott. Motion carried unanimously.

Motion was made by Eric Brady, TN, seconded by Jenny Combs, KY, to keep C.L.E.A.R. at the AITS training in the future. The motion passed unanimously.

The committee will work with the AITS Cadre to review the contract with the CLEAR company to make sure that all points of the contract are being met, and completing a survey each year to identify any problems or allow the opportunity to let us know that CLEAR is fulfilling the contract to our specifications. FDA has asked AAFCO ISC to host a sampling training for FDA personnel. This will most likely be a classroom setting. Jamie Spencer and Chad Linton will contact Jenny Murphy for more information. ISC has several questions on what is needed to conduct such a training. Updates will be made to the committee when information is gathered and will be made to the committee at Midyear Meeting in 2024. Additional people were added to workgroups. The following workgroups have been disbanded because their work has been completed: Current Issues and Outreach Committee Website Update and AITS/BITS Alignment WG.

Workgroups will continue to work on their charges. Chad Linton will add all workgroups with members to the AAFCO FeedBIN in the Projects area. Surveys will be sent to workgroups for possible workdays and discussions will continue on projects already in progress.

AITS Cadre: Jessica Gore (Lead), Chad Linton, Jamie Spencer, Eric Brady, Blaine Brown, Jordan Mancini, Madison Phillips

BITS Cadre: Chad Linton (Lead), Eric Brady, Blaine Brown, Jamie Spencer, Steve McMurry (AAPFCO-KY) Matt Pearson (AAPFCO-IN), Landen Kidd, Madison Phillips

AAFCO Branded Sampling Equipment and Tools WG: Jamie Spencer (Lead), Ethan Willis, Daniel Zangari, David Husner, Jim True, Alan Harrison, Chris Olinger

Inspector Guidance Tool for PC and cGMP Inspections WG: Ashlee-Rose Ferguson (Lead), Stephanie Adams, Barb Schroeder, Samantha Moran-Defly, David Husner, Jessica Gore, Eric Brady, Jamie Spenser, Wendy Powell, Lloyd Payne, Daniel Zangari, Christopher Olinger, Mike Davidson

Bulk Feed Tote/Super Sack Sampling Method Development WG: Chad Linton (Lead), Jamie Spencer, Blythe Dunlap, Stephanie Adams, Chris Olinger, Blaine Brown, Debra Gray

Aseptic Sampling Training Course WG: Chad Linton (Lead), Jessica Gore, Jonathan Roberts, Mark Glover, Jamie Spencer

Chain of Custody WG: Chad Linton (Lead), Jamie Spencer, Lloyd Payne, Jennifer Godwin, Josh Arbaugh, Jim True  
AAFCO Manual Update WG: Chad Linton, Jamie Spencer, Jessica Gore, Jim True, Blythe Freihage, Blaine Brown, Daniel Zangari, Chelsea Mills, Barb Schroeder  
Meeting adjourned at 1:45 pm.

## Laboratory Methods and Services Committee Report

2023 AAFCO Annual Meeting

August 1, 2023 8:00 am – 3:15 pm EDT, Baltimore, MD

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Actions:** None

### Committee Participants

**Members Present:** Joshua Arbaugh (WV), Ametra Berry (GA), Sally Flowers (KS), Tai Ha (NE), William Hoek (NY), H. Dorota Inerowicz (OISC), Robin Johnson (MT), Patty Lucas (FL), Teresa Riegel (FL), Kristi McCallum (co-chair/CO), Sharon Webb (co-chair/UKY), Dancia Wu (OISC)

**Advisors Present:** Jenny Bailie (NutriQuest/AMA), Matt Nichols (Neogen), Lars Reimann (Eurofins), Ken Riter (PFI NPAL), Leo Schilling (Eurofins)

**Virtual Attendees:** Christine Belna (OH), Buddhika Galkaduwa (KS), Srinu Chigurupati (FDA), Christina Chrysogelos (FDA), Lawrence Novotny (Life member), Nancy Thiex (Life member), Brenda Snodgrass (AAFCO PTP), Hemakanthi De Alwis (FDA), Rebecca Moseley (AL), Tai Ha (NE), William Hoek (NY), Andy Crawford (Consultant AAFCO PTP), Jeff Horst (Agri King), Michele Swarbrick (MN), Angela Swinford (FDA)

### Committee Activities

1. Dietary Fiber in Pet Food
  - a) Dr. Mangan gave a presentation on the many different ways to analyze for total dietary fiber in animal food. Each method is dependent on the type of dietary fiber present and there is no "one fits all" method.
2. The LMSC co-chairs have developed a library of technical training resources, including both internal and external sources, (videos, white papers, etc.) for laboratories. This is on-going as resources are being acquired and given to the AAFCO website developer.
  - a) Create a training resources library section on the AAFCO website – **Completed.**
  - b) Create a training needs form and post on AAFCO website – **Completed.**
  - c) Create a training proposal template that all labs can use to submit to the AAFCO BOD - **Completed.**
  - d) At the 2024 MY meeting, the LMSC will evaluate the training resources library to determine whether any of them are appropriate for additional in-person training at future AAFCO meetings or other locations.
  - e) Identify and work to deliver one in-person training opportunity each year. The Colorado Dept. of Agriculture held an on-site hands-on Microbiology Workshop in April 2023. The LMSC discussed continuing this workshop program and several State labs were interested in hosting a workshop or allowing a laboratory to send staff to another state laboratory for in-person training on a particular method or technology. This program is still under development. A survey will be sent to state laboratories prior to the MY meeting in 2024 to gauge participation in this program.
3. The LMSC discussed and agreed to conduct a hazard and regulatory program method need survey every two years. This survey will then be used to determine training needs. The LMSC agreed that an annual survey would be redundant as hazards in animal feed do not often change.

ACTION: Agenda approval

MOTION: Motion Joshua Arbaugh (WV)/Second Sally Flowers. Motion passes.

### Sub-Committee Activities

No update was given by the Quality Assurance sub-committee at this meeting. Kristi McCallum reached out to each member of the sub-committee to ensure that they were still willing to participate and that their objectives were clear.

1. Quality systems task

- a. LMSC QA Sub-committee is to provide resources related to quality and accreditation. A link has been established on AAFCO website where state regulatory and state laboratory personnel can gain information on laboratory capabilities. Resources can be sent to Kristi McCallum and Sharon Webb by the sub-committee.
- b. APHL to collaborate with LMSC to share resources or link directly to APHL ISO accreditation resource site.
- c. Update the AAFCO QAQC in Animal Feed Testing Labs document to align with ISO17025:2017. The co-chairs have started revising this document. Help is needed from the QA sub-committee to complete this.

ACTION: None

MOTION: None

### Committee Minutes

- 1) Welcome, Introductions, and Adoption of Agenda
  - a) Motion to approve - Josh Arbaugh (WV) / Second - Sally Flowers (KS)
- 2) Review of Committee Roster and Announcements
  - a) Kristi McCallum discussed the committee roster and will be reaching out to those members who do not attend meetings to confirm committee status.
- 3) Presentation: Dietary Fiber: Old Dog & New Tricks (Dr. David Mangan, Neogen)
  - a) Refer to PowerPoint posted on AAFCO website.
  - b) LMSC agreed that it should be up to manufacturer of the feed/pet food as to what method they use based on the manufacturing process.
- 4) FDA FSMA Laboratory Accreditation for Analyses of Food (LAAF) Program (Dr. Marla Keller, FDA)
  - a) Refer to the PowerPoint posted on AAFCO website.
  - b) Dr. Keller presented an overview of the FDA LAAF program. The requirements to participate in this program are detailed in the presentation. The program is voluntary but would make submitting laboratory reports and results to FDA easier.
- 5) Discussion on Carbohydrate Guarantees and ME Calculations (Josh Arbaugh, WV)
  - a) Josh Arbaugh suggested forming a working group. A Dietary Fiber working group was created but Josh stated that he will need to reach out to the Pet Food committee prior to starting any work on this.
  - b) A joint working group between the Pet Food committee and the LMSC Dietary Fiber WG is the best course of action.
- 6) Presentation: LMSC Training Program (Kristi McCallum, CO)
  - a) Refer to the PowerPoint titled: posted on AAFCO website.
  - b) This program is an attempt to provide additional training for employees. A webpage under the AAFCO site has been created and a training request form has been created. The site will provide a consolidated location for training resources and training materials and will provide links to other repositories of training materials.
  - c) Potential partners -APHL, State Labs, Instrument vendors (many have extensive training libraries/resources), FDA.
  - d) Next steps: Identify and contact potential partners, have system in place to monitor and respond to training request, identify labs willing to host training, and connect with BOD and AAFCO etc. for funding and completion of necessary paperwork. Discussed the need to align the training requests with available/existing trainings. Kristi McCallum will start working on a timeline for the training project and will contact some technology vendors to seek approval to link their training to our existing website.
- 7) Working Group Updates (LMSC)
  - a) Hemp – Hunter Buffington gave a presentation on the updates and progress. See presentation posted on AAFCO website. ASTM is in the position to lead the development and validation for methods and standards for: Shelf-life stability, Sample Preparation, Pesticide panel recommendations and validation, quantifying very low concentrations of cannabinoids in animal tissue. Consideration for holding a Symposium to review literature and discuss what the limit of cannabinoids. ASTM Inter-Laboratory Study with USDA -The variability study will expand the previous study to include more labs and low THC products; to try to understand

what is affecting the results. ASTM is looking for labs to participate and for low THC hemp product for sampling.

- b) Metals – Working on moving files to new folders and organizing WG.
- c) Fat Soluble Vitamins – Working on validation methods for Vitamin A, D and E. Vitamin D - Texas plans to submit their method in the fall for publication. Vitamin A -Larger test portions (100g) will be investigated using enzymes for coating dissolution with a subsample going to saponification extraction starting in Fall 2023. Vitamin E -Plan to include this with Vitamin A analysis once a Vitamin A method is selected, as these can be determined in a run.
- d) Mycotoxins – No update. Methods are well-established. The WG would work on Best Practice guidance only.
- e) Moisture – Lawrence has received data from labs and is processing it.
- f) Microbiology – CDA hosted a hands-on Microbiology Workshop in April 2023. All materials and resources are available for other labs to host a similar workshop. Methods for detection of microbial/pathogens in food and animal food are well established. Danci Wu is working with the Labeling Committee as there are many questions regarding labeling pre/probiotics.
- g) Dietary Fiber - had a general discussion about what the next step would look like. Discussed bringing in a nutritionist. The primary purpose of dietary fiber is labeling. Also, the labeling requirements apply to specialty pets as well. Part of the workgroup outcome will be to identify best practices for labs.

#### Action Items

Responsible	Item	Action	Timing / Status
Co-chairs	Hazards/Contaminants Survey	Revise and send survey to regulators for 2025	December 2024
LMSC QA Sub-committee	QAQC Guidelines	Revise the QAQC Guidelines to align with ISO17025:2017	September 2022–January 2023/In progress
LMSC	Training Resources	<ul style="list-style-type: none"> <li>• Collect training resources for new AAFCO website/LMSC Training</li> <li>• Need volunteer labs to host trainings</li> </ul>	January 2023 – January 2025/Resources are being obtained and are posted on website. This is on-going. APHL is coordinating with LMSC to link existing training resources to LMSC webpage. Survey sent August and September 2023 to state labs, responses being gathered for presenting at MY meeting in 2024.
Co-chairs (K. McCallum)	Training Program	Develop proposal and timeline for LMSC training program. Send survey to labs willing to host training	Proposal and timeline draft/ January 2024; in progress. Submit proposal to BOD and EIC/2024 MY meeting. Survey created and sent to Dani 9/22/2023.

## Model Bills and Regulations Committee Report

2023 AAFCO Annual Meeting

August 1, 2023, 10:45 – 11:50 am EDT, Baltimore, MD

### Committee Recommendations:

1. The AAFCO Board of Directors should direct the Ingredient Definition Committee to consider developing official feed terms for “ash,” “acid insoluble ash,” “air ashed,” and “sulfated ash.” If and when such official feed terms are accepted in the OP, SUIP #4 Ash and nutrient elements are not analytically equivalent should be deleted. (MBRC to give this directly to IDC)
2. Given that registration and labeling of silage additives is covered on page 113 of the 2022 OP under the definition of commercial feed in Section 3(b) of the Model Bill, SUIP #5 Registration and Labeling of Silage Additive Products should be deleted.
3. Revise Section 3(b) of the Model Bill as follows for clarity –Section 3(b) The term “commercial feed” means all materials or combination of materials which are distributed or intended for distribution for use as feed or for mixing in feed, unless such materials are specifically exempted.
  - i. Unmixed whole seeds and physically altered entire unmixed seeds, when such whole or physically altered seeds are not chemically changed or are not adulterated within the meaning of Section 7(a) of this Act, are exempt.
  - ii. The \_\_\_\_\_ by rule may exempt from this definition, or from specific provisions of this Act, commodities such as hay, straw, stover, silage, cobs, husks, hulls, and individual chemical compounds or substances when such commodities, compounds or substances are not inter-mixed with other materials, and are not adulterated within the meaning of Section 7(a) of this Act.
4. The AAFCO Board of Directors should direct the Ingredient Definition Committee to review historical information for evaluation of Spent Bleaching Clay as a possible official feed term or for inclusion under an existing oilseed definition or as a new feed definition. SUIP #6 Spent Bleaching Clay (SBC) should be retained in the OP at least until the Ingredient Definition Committee completes its review and makes a recommendation. (MBRC to give this directly to IDC)
5. The AAFCO Board of Directors should direct the Ingredient Definition Committee to consider establishing a feed term for “rawhide.” SUIP #7 Chews, Bones, and Toys for Pets and Specialty Pets currently states that “rawhide generally refers only to beef, and many of these chews use other types of animal skins or hides.” (MBRC to give this directly to IDC)

**Board Recommendations:** None

**Association Actions:** None

### Committee Report

Model Bills and Regulations Committee Chairman Doug Lueders called the meeting to order at 10:45 a.m. on Aug. 1, 2023.

Committee members participating in the meeting were: Ken Bowers (Kansas), Eric Brady (Tennessee), Patrick Clouser (FDA), George Ferguson (North Carolina), Kristen Green (Kentucky), Dave Husner (Pennsylvania), Darrell Johnson (Kentucky), Tim Tyson (FDA) and Scott Ziehr (Colorado).

Attending virtually: Dan King – Vice-Chair (Minnesota), Ben Jones (Texas), and Eric Nelson (FDA).

Industry advisers participating were Dave Dzanis and Renee Streeter (ACVN), Meghan Dicks and Steve Younker (AFIA), Bill Bookout (APPA), Emily Helmes (ETA), Jan Campbell and David Fairfield (NGFA), Angele Thompson and Pat Tovey (PFI), Cathy Alinovi (NGPFMA), Aaron Hobbs (NACIA), and Katie Vassalli (NOPA).

### Minutes from Previous Committee Meetings

Chairman Lueders noted that minutes from the committee’s Jan. 18, 2023, meeting and Pet Food Label Modernization review meetings on March 29 and April 3, 2023, were previously approved, posted on the AAFCO website, in the Feed BIN, and included within the 2023 AAFCO Annual Meeting Committee Report Book.



### **Labeling Work Group Update**

Mr. Brady informed the committee that the AAFCO Board of Directors directed the Feed Labeling Committee and Pet Food Committee to establish work groups to review and provide recommendations on the revised definition for “labeling” previously approved by the Model Bills and Regulations Committee during the 2023 AAFCO Midyear Meeting. The Feed Labeling Committee and the Pet Food Committee each will provide a formal recommendation back to the Board of Directors. Once the Board of Directors gets a consensus recommendation back from the respective committees, it will be sent to the MBRC for review.

### **SUIP Biennial Work Group Report**

SUIP Work Group Chair Ms. Alinovi reviewed the Work Group’s report:

#### **SUIP #4 Ash and nutrient elements are not analytically equivalent.**

*Work Group Recommendation:* The Ingredient Definition Committee should consider developing official feed terms for “ash,” “acid insoluble ash,” “air ashed,” and “sulfated ash.” After official feed terms for ash are accepted in the OP, SUIP #4 should be deleted. Mr. Ferguson moved to accept the recommendations. Mr. Husner seconded. Motion carried on a voice vote.

#### **SUIP #5 Registration and Labeling of Silage Additive Products.**

*Work Group Recommendation:* Given that registration and labeling of silage additives is covered on page 113 of the 2022 OP under the definition of commercial feed in Section 3(b) of the Model Bill, SUIP #5 should be deleted. Mr. Ferguson moved to accept the recommendation. Mr. Ziehr seconded. Motion carried on a voice vote.

*Work Group Recommendation:* Revise Section 3(b) of the Model Bill as follows for clarity:

Section 3(b) The term “commercial feed” means all materials or combination of materials which are distributed or intended for distribution for use as feed or for mixing in feed, unless such materials are specifically exempted.

- iii. Unmixed whole seeds and physically altered entire unmixed seeds, when such whole or physically altered seeds are not chemically changed or are not adulterated within the meaning of Section 7(a) of this Act, are exempt.
- iv. The \_\_\_\_\_ by rule may exempt from this definition, or from specific provisions of this Act, commodities such as hay, straw, stover, silage, cobs, husks, hulls, and individual chemical compounds or substances when such commodities, compounds or substances are not inter-mixed with other materials, and are not adulterated within the meaning of Section 7(a) of this Act.

Mr. Husner moved to accept the recommendation. Mr. Ferguson seconded. Motion carried on a voice vote.

#### **SUIP #6 Spent Bleaching Clay (SBC).**

*Work Group Recommendation:* The Ingredient Definition Committee should review historical information for evaluation of SBC as a possible official feed term or for inclusion under an existing oilseed definition or as a new feed definition. SUIP #6 should be retained in the OP at least until the Ingredient Definition Committee completes its review and makes a recommendation. Mr. Husner moved to accept the recommendation. Mr. King seconded. Motion carried on a voice vote.

#### **SUIP #7 Chews, Bones, and Toys for Pets and Specialty Pets.**

*Work Group Recommendation:* Incorporate the SUIP into Section 3(b) of the Model Bill by adding a new section iii as follows:

- iii. All chews, bones, toys and exercisers made of animal skin, hide, wood, or man-made (synthetic) material for Pets and Specialty Pets, whether flavor-coated or unflavored—Hooves, Ears, Animal Bones, Ligaments, Snouts, Pizzles—unless the manufacturer, in its product labeling or advertising, makes any claim that the product is intended for use as an animal food, or that the product provides anything of nutritional value to the animal (i.e., “digestible” or “high-protein”).

No member moved to accept the recommendation.

*Work Group Recommendation:* The Ingredient Definition Committee should consider establishing a feed term for “rawhide.” SUIP #7 currently states that “rawhide generally refers only to beef, and many of these chews use other types of animal skins or hides.”

Mr. King moved to accept the recommendation. Mr. Johnson seconded. Motion carried on a voice vote.

*Work Group Recommendation:* Delete the Labeling Note within the SUIP referencing CFR requirements.

After committee discussion, the recommendation was withdrawn.

*Work Group Recommendation:* Add the word “synthetic” in parentheses after “man-made” for clarification in proposed Section 3(b)(iii).

After committee discussion, the recommendation was withdrawn.

Due to time constraints, Chairman Lueders stated the balance of the SUIP Work Group recommendations would be considered at a later date by the committee.

**Feed Labeling Committee Proposed Modifications of Poultry Feed Guarantees**

Due to time constraints, Chairman Lueders stated the proposed modifications of poultry feed guarantees would be considered at a later date by the committee.

**Pet Food/Feed Cottage Food Exemption**

Due to time constraints, Chairman Lueders stated the topic of pet food/feed cottage food exemptions would be considered at a later date by the committee.

**Adjournment**

Chairman Lueders adjourned the meeting at approximately 11:50 a.m.

On behalf of the Model Bills and Regulations Committee, I respectfully submit this report and request acceptance of the report by the AAFCO Board of Directors and the Association membership.

**Pet Food Committee Report**  
2023 AAFCO Annual Meeting  
August 2, 2023, 1:15 – 3:15 pm EDT, Baltimore, MD

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Actions:** None

**Committee Participants**

**Members Present:** Kelsi Brown (MN), Julie Campbell (MO), Charlotte Conway (FDA), Karen Donnelly (FDA), James Embry (TX), George Ferguson (NC), Kristen Green (KY), Kristen Hamilton (ID), Justin Hill (NC), Holly Jewell (SC), Tiffany Leschishin (MN), Jo Lynn Otero (NM), Barbara-Jean Schleicher (KS), Katie Simpson (IN), Baily Whiten (GA), Stan Cook (LM), Liz Beckman (WA)

**Advisors Present:** Cathy Alinovi, Bill Bookout, Dave Dzanis, Louis Calderwood, Pam Kaufman, Jennifer Gornert, Chris Nash, Charles Starke, Angele Thompson, Pat Tovey

**Committee Report**

Meeting called to order at 1:17 PM EDT. A quorum for the meeting was established (17 of 18).

**Copper Claim**

Liz gave the update on the copper report with recommendation from the expert panel for low copper claim in PF10. Discussion started with Renee Streeter with ACVIM indicated that this is a good starting place for low copper. However, they are concerned that “low” may be confused with some of the veterinary therapeutic diets. Suggested that maybe can be considered “controlled” or “moderated” in the claims. Dave Dzanis agreed with her and added additional comments suggesting an amendment to the draft regulation. He also clarified to Katie Simpson’s concern indicating that this is not going to be below minimum requirements. Kristen made a comment that there is some precedence with low like “low carbohydrate” claim. Dr. Marcie Campion representing the Pet Food Institute Nutrition Sub-Committee commented that this topic has been discussed within the group and they pulled together their panel to review formulation nutrient databases to see where the copper levels were and realized there was a need and challenges to determine mineral tolerances. They felt these levels were arbitrary derived and lacking in scientific merit. PFI supports the copper expert panel findings and the AAFCO conclusion, considering the available publications data is lacking showing dietary copper levels are negatively affecting healthy dogs and cats. Susan Thixton commented that consumers want the option of a low copper food for their pets. Members of AFIA also expressed their concern for the development of a regulation and the lack of science data. Further discussion led to a motion from Kristen Green.

Motion: To form a workgroup to consider the recommendation and recommended language of the expert panel for a low copper claim in PF10. Furthermore, the workgroup is charged to report its recommendation of the same to PFC at or before the 2024 Mid-Year meeting. Seconded by George.

Motion passed. Workgroup lead is Karen Donnelly.

**Human Grade/USDA Training**

Holly gave a Human grade update which included some of the challenges for the PVP program which included needed documentation and unknown associated fees. Recommendation was for the Human Grade workgroup to reconvene and develop guidance for industry in navigating the Human Grade claim process and will report back to the PFC in January.

**Labeling Definition Joint Work Group**

Liz gave update on the Labeling Definition with a charge from the board to have a joint workgroup with Feed Labeling Committee to have 2 industry advisors and 2 regulators from PFC which are Bill Bookout, Pat Tovey, Kristen Green, and Jo Lynn Otero.

**Training and Outreach Sub-Committee Update**

Holly gave an update on the PFC Training & Outreach workgroups.

**Wrap-up and Thank you**

Liz went over the 50-state survey and results. Wrapped up with a Big Thank You to everyone involved with PFLM.

**Meeting adjourned at 3:15 PM EDT**

## Proficiency Testing Program Committee Report

2023 AAFCO Annual Meeting  
July 31, 2023, 2:15 pm EDT, Baltimore, MD

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Actions:** None

### Committee Participants

**Members Present:** Josh Arbaugh (Board Liaison), West Virginia Department of Agriculture; Kristi McCallum, Colorado Department of Agriculture; Sharon Webb, University of Kentucky Division of Regulatory Services; Sally Flowers (Chair), Kansas Department of Agriculture; Teresa Rygiel (Vice-Chair), Florida Department of Agriculture & Consumer Services; Patty Lucas, Florida Department of Agriculture & Consumer Services; Michele Swarbrick, Minnesota Department of Agriculture; Tai Ha, Nebraska Department of Agriculture; Ametra Berry, Georgia Department of Agriculture

**Advisors Present:** Frank Sikora, Magruder PT Program (virtual); Ken Riter, PFI; Lars Reimann, AFIA

**Virtual Attendees:** Andy Crawford (PTP Statistician), Crawford Consulting Services; Alexa Bombich (PTP QA Manager), Brenda Snodgrass (AAFCO PTP Program Manager), AAFCO; Denice Mittelstaedt, New Mexico Department of Agriculture; Susan Humphries, FDA; Gail Swinford, FDA; Janna Hutchinson, FDA; Linda Benjamin, FDA; Bob Kieffer (PTP), Able Laboratories; Mo Kieffer (PTP), Able Laboratories; Nancy Thiex, AAFCO Life Member; Rebecca Moseley, Alabama Department of Agriculture & Industries; Jamie Minter, Melissa Nichols, Missouri Department of Agriculture; Jeff Horst; Katie Nass; Carolina Ribeiro; Hannah Brown

### Committee Report

January 2023 committee action items were completed or are on track. The new ISO 17043 standard is available for purchase. Alexa will update the quality manual and any other system documents to align with the changes. Andy has added Robust R-Bar statistics to AAFCO PT reports. Mo Kieffer is no running Able Laboratories. The committee continued to shape the AAFCO Laboratory Round Robin. Once details have been finalized, a proposal needs to be sent to the Board of Directors (BOD) for review. The Analytical Variances Workgroup previewed recommendations for updating the AAFCO AVs as a series of short-, mid-, and long-term goals with PTP Committee ahead of the August BOD meeting.

#### Committee Activities

ACTION: Approve meeting agenda

MOTION: B. Snodgrass/Second: J. Arbaugh – passes

ACTION: Move to adjourn meeting

MOTION: B. Snodgrass/T. Ha – passes

**Subcommittee Activities:** None

#### Committee Minutes

1. Call to order – S. Flowers  
The meeting agenda was reviewed and approved.  
ACTION: Approve meeting agenda  
MOTION: B. Snodgrass, Second: J. Arbaugh
2. Program Leadership and Administrative Update
  - a. Introduce new QA Manager, Alexa Bombich – S. Flowers
    - i. Alexa introduced herself.
  - b. Quality Management System Update – A. Bombich
    - i. Recently received the updated Standard and are reviewing it. We will work to update the quality manual and any policy and procedures to make sure we are in line with any changes.
3. 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 (completed)
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 (completed)
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

Question in Chat about accreditation: Denice Mittelstaedt asked if the updates on QC documents would need to be sooner due to the upcoming audit. Brenda Snodgrass addressed the timeline.

4. PTP Budget Update – B. Snodgrass
  - a. Refer to the AAFCO PT Program Budget Overview PowerPoint.
  - b. Budget looks good and the excess monies is being held in the AAFCO account and can be used for special projects and unexpected expenses.
  - c. No questions on the budget.
5. 2023 Subscription Update – B. Snodgrass
  - a. Refer to the Scheme Subscription Status PowerPoint.
  - b. As of July 2023: Animal Feed 228 labs (236 ordered); Pet Food Ingredients 118 labs (120 ordered); Minerals 48 labs (51 ordered); Mycotoxin 91 labs (91 ordered).
  - c. No labs reported metals speciation data.
  - d. Background on the schemes provided by Brenda:
    - i. Animal Feed is monthly but with various matrix types, you actually get a total of 13 samples.
    - ii. Pet Food Ingredients – (2013) was added next because the pet food manufacturers wanted to be able to do PT for their quality labs. Four samples a year. Pet Food Quality Labs are requiring each analyst to perform a PT.
    - iii. Minerals (2015) – Added with federal grant monies. It was started in 2015.
    - iv. Mycotoxin (2014).
    - v. Addition to Robust Range to PT Program Reports – Andy has added Robust R-Bar to the reports.
    - vi. Comment from Andy: %RSD is the %RSD of the Assigned Value, not the duplicates.
    - vii. Mo/Bob provided an update – Bob explained that his daughter, Mo, is now running Able Laboratories.
6. Customer Feedback – B. Snodgrass
  - a. No customer feedback received.
7. Laboratory Sampling Survey / Sampling Round Robin overview presentation (Michele Swarbrick) – refer to PowerPoint for details.
  - a. Proposal: Two rounds (semiannual), each test item would be 1 kg. Able Laboratories prepares the test items by weighing each ingredient individually and put them into each lab's container, cost based on the number of labs, when labs receive the samples they would prepare it as normal, labs would analyze the samples. The aim is to have Lab Sampling Round Robin, subscription for 2024. Statistical evaluation would be provided.
  - b. Survey questions – See PowerPoint for questions.
  - c. Benefits – Labs are to having to construct/design sample prep study themselves. Labs would see how their results compare to other. Data could be used as part of validation of sample prep. Labs could purchase multiple subscriptions.
  - d. Questions –
    - i. Kristi – What kind of reports are labs going to get back? If you have acceptable results for some analytes and not others what will that mean?
    - ii. Tai/Josh – How will we know the difference between sampling error verse method errors?
    - iii. Brenda – The WG is still discussing how best to capture the Sample Prep & Test Portion Selection. Then once the information is captured, how best to present that information.

- iv. Andy – We can use the same sample for both so you can have the sample prepared by Able labs as normal and then have Able lab send the bulk unprepared sample so you can use it as comparison.
- v. Brenda – Rather than replacing a round in the PT scheme, instead we can have Able Labs make a big mix of a sample and let them process it for both the normal PT and then the Sample Prep PT.
- vi. Nancy – This proposal would double the amount.
- vii. Sally – Is this feasible for Able Labs? Bob - I believe we can do that, but it would be more expensive.
- viii. Josh – Do we need to limit the number of labs? We have not set a limit.
- ix. Kristi – Would labs not want to participate after a while unless their sample preparation procedures change?
- x. Nancy – This should be considered like a QC that could be just incorporated into a labs process like any other QC for other procedures.
- xi. Brenda – A lab would want to demonstrate to ISO accreditors that sample prep is in control.
- xii. Sharon – Agrees with Kristi’s concern that the labs will lose interest in participating frequently.
- xiii. Kristi – When it’s advertised make sure you mention what it used for and how it can continue to be used.
- xiv. Denice – When you suggested sending it unground and ground has value to see the difference it would have value every year to know that your consistent. You can have multiple staff do it and develop a measurement uncertainty.
- xv. Sally – It has been suggested that we try this for one year as a pilot.
- xvi. Leo – Even if you are sending out a ground and unground, they will not be equivalent. As an alternative look at other sources that leads to particle segregation. Try instead experiments within the lab that avoid shipping segregation.
- xvii. Nancy – All this information is available to you in your PTs but if we want to do one set of ground vs. unground, we can do it but it’s going to provide reduced returns.
- xviii. Nancy – We do know that you’re going to get varied results based on how well some analytes perform inherently. You need to gear your sample prep process to the most demanding analytes.
- xix. Brenda – Test portion size is extremely critical in micronutrients and vitamins
- xx. Ken – Why don’t we do a study and we send a sample around and tell each lab what method to do?
- xxi. Brenda – It may have three options for specific sample prep procedure.
- xxii. Rebecca – It would be great if after sample prep we could ship the sample back to the same lab that’s going to analyze all the participants samples the same way (same method code).
- xxiii. Frank – It seems like there will be another level of method to report. Method for sample prep and method for chem analysis.
- xxiv. Andy – I will do the statistics on the data.
- xxv. Bob – Recommends that we don’t start early in the year. Set the deadline for sign up in January and start maybe in May
- xxvi. Josh – PTP Committee needs to send this proposal to the Board. You need to send the proposal to the Board by September. Then we could start recruiting directly after that. We will need to write the proposal up and include the pricing structure and then do an e-vote by the end of August.
- xxvii. Sally reviewed the proposed scheme for a possible vote.
  - 1. Proposal – two rounds (semiannual)
  - 2. Each test item would be 1 kilogram
  - 3. Able Laboratories would prepare the test items by weighing each ingredient individually and put them into each lab’s container
  - 4. Labs receive the samples they would prepare it as normal, labs would analyze the samples.
  - 5. The number of labs could be capped at 60 labs.

6. Target start date – May 2024
  7. For the survey questions we will start with the 6 we already have for the pilot.
  8. Brenda can add the method codes.
  9. All samples will be unground
  10. Name: AAFCO Laboratory Sampling Round Robin
8. AV Workgroup update – S. Flowers
    - a. Sally reviewed the Workgroup recommendations which were broken out into Short-term, Mid-term and Long-term goals.
    - b. Questions
      - i. Lars – to what extent is this wishful thinking, where will we find the resources, money and volunteers.
      - ii. Josh – My concern is not as much with the financial aspect but with finding enough staffing resources.
      - iii. Ken – Will you be able to send this draft out?
      - iv. Sally – We will need to get it reviewed by the board before publishing this draft proposal.
      - v. Frank – I noticed that there is a \$80,000 / year surplus in the PT program that can be used.
      - vi. Kristi – This is comprehensive but I agree with Lars that it’s a big investment. The one thing that comes out of this I hope is some guidance for the field sampling.
      - vii. Ken – My biggest concern is the short-term plan. I ‘m just concerned about changing things for the short-term.
      - viii. Mark L – We are better off with data that reflects modern check sample data rather than historical data which they are using now every day.
      - ix. Andy – Some analytes may not have any PT data available to evaluate.
      - x. Nancy – I agree with Ken, the Mid-term and Long-term goes are great but get rid of the short-term goal.
      - xi. Frank – In the Hemp world, they are only using measurement uncertainty.
  9. Other Business
    - a. In the future Zoom links for PTP Midyear and Annual meeting only be sent by FASS to registered attendees. There are AAFCO scholarships available to support member attendance.
    - b. Use of Baltimore B room on Tuesday: This room is being used by multiple groups so please make sure to take all belongings during Tuesday lunch.
    - c. Roundtable Discussion – none; previous PTP agenda items used the allotted meeting time
  10. The meeting was adjourned.  
 ACTION: Move to adjourn meeting  
 MOTION: B. Snodgrass/T. Ha – passes

**Action Items**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing/Status</b>
QA Manager/Program Manager	ISO 17043 updates	Update Quality Management System to meet updated ISO 17043 standard	Complete by 2025
Committee Chair	AAFCO Laboratory Sampling Round Robin	Finalize details with PTP Committee input; prepare proposal; share with BOD	October 2023



# Strategic Affairs Committee Report

2023 AAFCO Annual Meeting

August 2, 2023, 9:45 am – 10:45 pm, In Person/Virtual

## Committee Recommendations

- **Report acceptance.**
- **Recommend:**
  - A. Replace the Travel Procedures in the Procedures Manual with the approved version shown in Appendix 1

## Board Recommendations:

- **Report accepted – add date**

## Association actions:

- **Report accepted – add date**

## Committee Participants

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

**Bold** = Present; ***Bold Italic*** = Virtual

**By-Laws Sub-Committee:** Ken Bowers, Erin Bubb, George Ferguson, Doug Lueders, Kristen Green

## Committee Report

1. Strategic Plan 2023-2025 Update
  - 2023-2025 SAC assignment:  
Establish charitable giving/scholarship framework. (Objective 1.3 Task 2)  
**Responsible:** Strategic Affairs Committee (SAC) and FC  
**Deliverable:** Completion of guidelines for recommendations to the Board within one year and Board implementation within two years.
    - Aligns with organizational health, not with financial management improvement. Could be scaled. One charity per year that President recommends and Board approves. Could include educational scholarships or endowment foundation. Develop thresholds and guidelines when revenue allows.
    - Should report out at midyear and annual. Could include report back from recipients at member meetings.
  - Timeframe:** Annual meeting 2024
    - SAC & FC Collaborative Work Group: Ernie Berkeley (lead), Kristen, Ashlee-Rose, George, Linda and Austin
    - Discussion for consideration by the Work Group:
      - Concept arose as a result of Presidents who wanted to donate in lieu of Presidential plaque; donations have been to a cause of the President's choosing
      - FC group working to identify investment triggers; money available outside normal budget to be used to reinvest in organization; could include charitable giving
      - Could be both presidential donation and educational, finances permitting. Could be scalable and budget dependent; build process to include in budgeting cycle
      - Build process - could be educational endowment which would require ongoing work (organization/monetary commitment (10-20K); AFIA have an education foundation for which they fundraise; Could include industry collaboration - needs to be explored
      - Need criteria (e.g. recognized charity, no conflict of interest, related to AAFCO Mission)
      - Need to be clear that this is not the same as AAFCO scholarship to support member attendance at meetings (generally specific travel costs)
      - Could be used to fund attendance of non-members to meetings (e.g. Ag student exposure to AAFCO, MANRRS program (Minorities in Agriculture, Natural Resources and Related Sciences), FFA (national officers), 4H (age appropriate)). Would need to define what they do when attending (Roberts Rules, taking minutes)). Define selection process to identify recipient with real interest. Advertising to Ag colleges to promote awareness and interest in careers in

feed (regulation/manufacturing) through endowment, internship, attendance at AAFCO meetings

- Could be an internship with some monetary support; or, Co-op (anytime during the year) or summer student.
- Summary areas to consider:
  - Attendance travel Scholarships for members and non-members
  - Charitable giving o Continuing education scholarships o Internship program

- Overall 2023-2025 Strategic Plan updates from Annual meeting Committee work (Attachment 2)

2. Procedures Manual

- 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, Kristen, Stan and Austin (lead)
  - Update: Work outline started in the Bin. Business practices versus association practices need to be differentiated, perhaps with different sections in the PM. By-Laws Subcommittee did a review and made recommendations for a few other activities (Shared in Bin).
  - Note that the Board also developed a charge to form a BOD workgroup (Austin, Ken and George) to review Chapter Three of the Official Publication, excluding the Association By-Laws. This workgroup should consider overlap with the procedure’s manual and committee guidelines as well as the creation of internal standard operating procedures associated with routine association work. Special emphasis should also be given to consider including a new table that defines the pre and post meeting deadlines and responsibilities around creating the Business Meeting Agenda. The workgroup should provide a recommendation back to the BOD at the 2023 July BOD meeting. This Board Charge will be integrated into the SAC WG activity.
  - Timing: Draft report by Midyear 2024
  - Update: Organizational discussions have been initiated to better define placement.

3. New business

- Travel Procedures (Procedures Manual) Update (Attachment 1 (with markup) Appendix 1 (final clean version))
  - Secretary Treasurer and FASS revisions reflecting procedural adjustments, clarification and streamlining
  - Discussion

**Motion to accept updated Travel Procedures in the Procedures Manual - Kristen, second - Scott. Motion carries.**

- SAC representative to IT Committee - none identified at this time

Information item: Board Meeting Minutes now live on website in the member toolkit

**Motion to accept August 2, 2023 SAC Annual meeting report - Kristen, second - Ken. Motion carries.**

**Action Item Table**

Responsible	Item	Action	Timing / Status
WG: Ashlee-Rose, Kent, Ken, Linda, Kristen, Stan and Austin (lead)	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 Midyear 2024
Ernie Berkeley (lead), Kristen, Ashlee-Rose, George, Linda and Austin	SP: Objective 1.3 Task 2 (FC & SAC collab)	Establish charitable giving/scholarship framework.	Annual 2024

## **Attachment A: Update to Travel Policy**

The full report is available at <https://www.aafco.org/wp-content/uploads/2023/10/10.-SAC-Minutes.pdf>



## **Information Technology Committee Report**

2023 AAFCO Annual Meeting

July 31, 2023, 4:45 – 5:15 pm EDT, Baltimore, MD

**Committee Recommendations:** None

**Board Recommendations:** None

**Association Actions:** None

### **Committee Report**

#### **Welcome & Opening Remarks**

George Ferguson – Committee Chair (NCDA&CS)

Meeting was called to order at 5:00 pm EDT by George Ferguson. No roll call was made, as there were no topics to entertain requiring a vote.

A request was made by George Ferguson for those AAFCO participants with an interest in IT to reach out to himself or Sarah Condra to discuss joining the IT committee. He noted that while there was currently little work going on under the committee, there would be significant work coming up over the next year.

Mr. Ferguson also announced the transition to the new IT Committee Chair, Sarah Condra of NCDA&CS. She will take over the position sometime before January 2024.

#### **Call for New Business**

George Ferguson – Committee Chair (NCDA&CS)

No new business was entertained.

#### **Committee Updates**

##### **Common Foods Index, SharePoint site development**

##### **George Ferguson (NCDA&CS)**

The Common Foods Index submission portal will create an automated submission, tracking, voting and posting system for submitted items. While the board of directors had already approved a SharePoint site specifically for the CFI, since the new collaboration portal under SharePoint had also been approved, the decision was made to combine the efforts into a single site with the development to managed by the same services provider.

##### **Announcement of new committee Chair**

##### **George Ferguson (NCDA&CS)**

See notes in Opening Remarks section above.

#### **Workgroup Updates**

##### **AAFCO Collaboration Site Update**

##### **Jennifer Roland (NASDA)**

Jennifer Roland announced that the board had accepted the RFP from Konica Minolta and All Covered to manage the development and launch of AAFCO's new collaboration portal. The first meeting with the firm to initiate the work was scheduled for August 8. Jennifer Roland, Executive Assistant with NASDA, was named as the project manager to oversee this task by the AAFCO BOD as per the agreement under the joint NSADA/AAFCO federal funding opportunity.

**Meeting was adjourned at 5:15 pm EDT.**