



FINAL: 01/25/2024

Feed & Feed Ingredient Manufacturing Committee
2024 AAFCO Mid-Year Meeting
January 25, 2024, 8:00am – 8:45 PM (EST), Chattanooga, TN

Committee Minutes

The committee chairs called the meeting to order at 8:00 AM (EST).

Committee Participants

Members Present: Charles Hubenka, Jessica Gore, Ken Bowers, Justin Henson, Ben Jones, Laura Scott, Bailey Whiten, Trish Dunn

Advisors Present: Charles Starkey (NARA), Dave Fairfield (NGFA), Dan Frank (AFIA), Patrick Tovey (PFI), Louise Calderwood (AFIA), Bill Bookout (APPA), Patrick Foley (PFI)

Virtual Attendees: Dragan Momcilovic, Linda Benjamin,

Others Present: Emily Cornwell (FDA), Michael Murphy (AVMA)

Agenda

1.) Welcome/Introduction

2.) Review Action Items/Reports from Working Groups and Liaisons

- **Contaminant and Hazard Lab Strategy Regulatory Program Needs Survey.**
 - The group conducts a survey every two years, and the inquiry is made if there are any updates from Working Group 3.
 - Sharon Webb responds, stating that the survey was circulated, and the top concerns were shared at the annual meeting. After that, the decision was made to disband the group and collaborate with another group associated with Scott Ziehr. This new group works on labs and lab services, conducting method needs surveys. Sharon Webb mentions that the results of this survey are being compiled. The plan is to discontinue Working Group 3 and align efforts with the other group. The frequency of the survey is discussed, confirming it is conducted every two years, and there's a suggestion to send it out again in the current year.
 - Pat Tovey confirms the biennial nature of the survey, and Sharon Webb indicates the willingness to send it out again if that's what is desired. The discussion concludes with the acknowledgment that Working Group 3 has been disbanded.
- **Working Groups Disbanded:**
 - The VSIP section in the OP and the Nutrient Contamination Working Group have officially disbanded as well.
- **Strategic Plan Assignments for 2023**
 - The FFIM portion of the strategic plan is declared complete, and alignment of Chapter 5 to AFRPS is mentioned. The sections have been modified, and the FFIM contribution to the strategic plan is considered finished.

3.) New Business

• **Veterinarians' Survey with Dr. Mike Murphy and Dr. Emily Cornwell**

Charles Hubenka introduces Dr. Mike Murphy and Dr. Emily Cornwell from AVMA, who will present the results of a survey on veterinarians' knowledge and communication regarding the disposal of animals euthanized with pentobarbital. Dr. Cornwell shares the key takeaway that veterinarians may benefit from additional education and resources regarding proper disposal to prevent contamination of the animal food supply and address environmental concerns.

Dr. Cornwell explains the survey's objectives, methodology, and participant categorization based on species

euthanized. The survey revealed insights into disposal responsibilities and methods following pentobarbital euthanasia. Over 16,000 AVMA members were surveyed, receiving 2093 responses (12% response rate). Veterinarians were categorized based on the species they euthanize; food-producing, non-food producing, or a mix of both. Additional details on the following results may be found online.

- **Question 1: Responsibility for Disposal:**
 - For food-producing species, veterinarians exclusively dealing with these species reported facilities disposing of animals more frequently than those euthanizing mixed species. The lab group has created a template for laboratory trainings and workshops, which will be sent to the board in February.
 - Veterinarians handling mixed species more often reported clients being responsible for disposal of food-producing animals.
 - For non-food producing species, those exclusively dealing with them reported facilities being responsible more frequently.
 - Veterinarians handling mixed species more often reported clients or veterinarians being responsible for disposal.

- **Question 2: Methods Recommended for Disposal**
 - Rendering, burial, incineration, bio-digestion, composting, and other were the disposal methods considered. However, rendering was recommended less frequently, with variations based on species.
 - Equids showed a higher percentage of recommending rendering, especially among veterinarians exclusively handling non-food producing species.
 - Recommendations for rendering were generally below 10%, except for equids.

- **Key findings**
 - A significant percentage of respondents indicated a lack of knowledge or guidance on proper disposal methods.
 - The survey identified gaps in understanding proper disposal techniques for specific species.
 - Veterinarians expressed varied agreement levels regarding the explanation of euthanasia methods to clients and advising clients on disposal based on techniques and species.

AVMA Recommendations:

1. **Education and Outreach:** There's a need for additional education, outreach, and resources for veterinarians regarding the proper disposal of euthanized animals.
2. **Targeted Guidance:** Specific guidance should be provided based on the species euthanized, considering the differences in recommended disposal methods.
3. **Environmental and Food Safety Concerns:** Emphasize the importance of proper disposal to prevent contamination of the food supply and address environmental concerns.
4. **Targeted outreach:** Aimed at veterinary species groups, producer groups, food industry associations, academia, and state and federal agencies. There are also plans for in-person and on-demand webinars to disseminate information.

The floor was then opened to questions: During the Q&A session a commentor asks about the last graph slide and specifically asks about the role of dead animal haulers in the context of the disposal methods discussed. Dr. Murphy clarifies that the survey was sent to members of the American Veterinary Medical Association (AVMA), which includes veterinarians only. The focus of the survey was on veterinarians and their knowledge and recommendations regarding the disposal of animals euthanized with pentobarbital. They then seek further clarification on whether dead animal haulers are

considered in the survey. Dr. Murphy explains that the survey did not include renderers or the general public. It was targeted at veterinarians, representing around 75% of all licensed veterinarians in the United States. The survey aimed to understand what veterinarians know or recommend rather than surveying clients or other professionals involved in the disposal process.

Another commentor follows up by asking about the disposition options captured in the "other" category and whether the veterinarian's provided information on alternative disposal methods. Dr. Murphy responds that there was a free-text option for the "other" category, and examples mentioned included options like aqua digesters or liquid digesters used in some diagnostic labs.

In response to the discussion, Dr. Cornwell and Dr. Murphy emphasize the collaborative efforts between AVMA, AFIA, and renderers. They highlight ongoing educational initiatives to inform veterinarians and clients about appropriate disposal methods, especially regarding the risks associated with rendering. The focus is on preventing pentobarbital from entering the animal food stream. Dr. Murphy mentions the AVMA's roundtable involving various stakeholders and expresses the intention to communicate effectively to different groups.

4.) Canadian Regulatory Update – Laura Scott

- The feed regulations are on track for publication in spring 2024, and additional guidance will be released simultaneously. This includes the final versions of incorporated documents containing the list of approved ingredients and permissible claims. Information from the CG1 consultation is available on the web, with a 97% accuracy rate. Licensing guidance, a significant concern for many, will be released with the new regulations, and further information will be provided post-publication. A suggestion to combine the documents into one for convenience is given and agreed to quickly. Discussion involves confirming that the audit checklist indeed provides the actual audit process.
- Ms. Scott emphasized that licensing is delayed by 18 months from the publication point, allowing time for preparation. A notice to the industry has been published to address questions about the current year's renewal period. Registered products are due for renewal by March 31st, and stakeholders are urged to submit renewals promptly to avoid disruptions in marketing. If stakeholders believe they have products due for renewal but haven't received a notice, they are encouraged to contact the Pre-Market Application Submissions Office (PASO).
- Several consultations have occurred, resulting in four new or modified feed ingredient descriptions. More ingredients are expected soon, and Ms. Scott advised stakeholders to monitor the relevant webpage for updates. A closed consultation focused on guidance for determining when a plant-derived ingredient requires a pre-market assessment, particularly concerning novel plants. Comments are being analyzed, and final guidance will follow. Additionally, final guidance on feed approval or registration requirements for the acceptance of foreign approval authorizations is in progress.
- Stakeholders are encouraged to subscribe to the listserv for updates and can find Canadian feed information on the main Canadian Food Inspection Agency page under Animal Health and Livestock Feeds.

5.) Industry Stakeholder Updates

a. American Feed Industry Association – Louise Calderwood

- **Update 1:** The first pertains to legislative changes at the federal level, particularly focusing on the modernization of the Center for Veterinary Medicine's (CVM) policy guide determining the regulation of animal food additives as drugs or food. The AFIA, in collaboration with the FDA, has been working on the Innovated Feed Enhancement and Economic Development Act, introduced last March. The goal is to attach this act to a bill in the House, following the success in the Senate the previous year. The act aims to appropriately regulate animal food additives that exclusively act within the animal's gut, addressing aspects like animal food safety, the environment, animal well-being, and co-products of digestion. Strong industry and regulator support.

- o **Update 2:** The second update concerns educational opportunities offered by AFIA. The association is offering the Kansas State University online "Fundamentals of Feed Manufacturing" course every other month. The course covers every aspect of feed manufacturing and is designed for individuals both seeking credit and those who prefer a non-credit option. The course is particularly beneficial for new inspectors or individuals without prior background knowledge of the feed industry. Enrollment in the course is robust, and interested parties can find more information on AFIA.org under events. The course starts at the beginning of February and runs every other month thereafter.

b. North American Renderers Association Update – Charles Starkey

- o They continue to operate the Animal Protein Producers Industry (APPI) program, a voluntary microbial testing initiative initiated by the rendering industry four decades ago.
- o The program adheres to FSMA guidelines and aims to enhance hygiene standards within rendering facilities. Mr. Starkey also mentions their certification programs aligned with FSMA guidelines.
- o Additionally, he announces an upcoming educational symposium focused on the sustainability of animal protein ingredients. The rendering symposium will feature discussions and highlights of their ongoing work in this area. Mr. Starkey encourages attendees to stay an extra day after the meeting to participate in this educational event at IPPE in Atlanta.

c. National Grain and Feed Association update – Dave Fairfield

- o They plan to continue partnering with Kansas State University to offer PCQI (Preventive Controls Qualified Individual) training through the Food Safety Preventive Controls Alliance (FSPCA) curriculum.
- o Three courses are planned for the coming year (April, August, and November), open to anyone in the industry.
- o The National Grain and Feed Association also address the need for readily accessible training on regulatory requirements. They have developed five asynchronous online courses covering FDA regulatory requirements for animal food facilities. These courses, ranging from one to two hours in length, will be available on their Learning Management System (LMS) starting in February.
- o They also mention their involvement in the Food Safety Preventive Control Alliance (FSPCA) and announces an upcoming animal food lead instructor webinar scheduled for February 29th. The webinar (with CVM) aims to provide information and compliance updates to lead instructors, helping them emphasize crucial points during course delivery. Supplementary materials will be provided during the webinar.

d. Pet Food Institute update – Pat Tovey

- o **Regulation Changes:** Pat mentions that during the PFI update in Baltimore, they discussed PFI's move towards changing the way pet food is regulated in the U.S. This change is not influenced by specific states or committees within AAFCO.
- o **Annual Symposium Update:** In early December, PFI's food safety group met during their annual symposium. They received updates from university researchers on co-funded projects, including work on processing aids and tanker washouts for salmonella control.
- o **Mycotoxin Research:** PFI is collaborating with a university researcher to establish a safe upper limit for mycotoxins, specifically ochratoxin A and T-2/HT-2 toxin. The focus is on finished pet food products.
- o **Foreign Material Working Group:** A working group has been formed within PFI to discuss industry practices and approaches towards foreign material, both in products and incoming ingredients. This includes addressing hard and sharp foreign material.
- o **Nutrition Subcommittee's Journal Article:** The nutrition subcommittee, consisting of PhD nutritionists, has drafted a journal article. The article will be submitted for peer review with the Journal of AVMA. If accepted, a 90-day turnaround for publication is expected. The information may be relevant to the nutrient profiles group and the copper issue discussed during the meeting.

e. American Pet Products Association Update – Bill Bookout



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- o **APPA Weekly Newsletter:** a weekly newsletter that disseminates new information, including updates on topics like the Innovative Feeds Act or anything from PFI. Mr. Bookout encourages reaching out if there are any inquiries.
- o **Global Feed Expo in Orlando:** The Global Feed Expo in Orlando is scheduled for March. Mr. Bookout highlights the educational opportunities available during the expo and expresses openness to participation.

6.) Other Business

a. FFIM Charge from AAFCO Board of Directors

The update discusses a new charge to FFIM from the board of directors meeting, originating on Monday of the week. The charge is to explore the use of validated third-party audit data, inspired by a similar project initiated by human food counterparts at AFDO. The goal is to examine how states could potentially utilize this data to adjust their inspection frequencies.

- o On the human food side, there's a mechanism in place with the food code, which is being worked through the comments for food protection. In contrast, the animal food side lacks this mechanism but has some flexibility within the AFRPS standards regarding inspection frequencies.
- o The presenter anticipates starting the process for reviewing AFRPS standards for revisions later in the fall. The idea is to create a project inviting industry participants to submit proposals demonstrating how validated third-party audit data could be incorporated into the AFRPS standards. While not replacing inspections, this approach could assist states in extending inspection frequencies if the data proves usable.
- o **Working Group Formed:** Charles Hubenka, Jessica Gore, Ashlee-Rose Ferguson, Charles Starkey, Louise Calderwood, Dave Fairfield.

Adjournment - The Feed & Feed Ingredient Manufacturing Committee Adjourned at 8:52am (EST)