Final 9/3/2024

INGREDIENTS DEFINITION COMMITTEE (IDC) MEETING
HYATT REGENCY SAN ANTONIO RIVERWALK
SAN ANTONIO, TEXAS
AUGUST 7, 2024, 1:15 P.M. CT

Committee Recommendations:

1. Move to OFFICIAL- T60.117 (A) Dried Black Soldier Fly Larvae (**finfish)**
   60.117 Dried Black Soldier Fly Larvae is the dried larvae of the Black Soldier Fly, Hermetia illucens, with or without mechanical extraction of part of the oil, that has been raised on feedstock composed exclusively of feed grade materials. The ingredient must be labeled for guarantees for minimum crude protein and minimum crude fat on an as-fed basis. If oil is mechanically extracted, maximum crude fat must also be guaranteed on the ingredient label. The ingredient is dried by artificial means to no more than 10% moisture. It is for use in finfish, poultry, and swine feed and in adult dog food as a source of protein and fat consistent with good feeding practices.

2. Move to OFFICIAL- T60.120 Dried Chicory Root Pulp
   60.120 Dried Chicory Root Pulp is the dried pulp produced as a byproduct of inulin extraction from the root of Cichorium intybus L., intended as a source of fiber. It shall contain no more than 10% inulin, no less than 60% total dietary fiber, and no more than 13% moisture.

3. Move to OFFICIAL- T60.121 Dried Mealworm Meal
   60.121 Dried Mealworm Meal is obtained from the dried larvae of the yellow mealworm beetle (Tenebrio molitor) which has been raised on a feedstock composed exclusively of feed grade materials and from which part of the oil has been extracted using a mechanical process. The ingredient must be labeled with guarantees for minimum crude protein, and minimum and maximum crude fat. The ingredient is artificially dried to no more that 8% moisture. It is for use in adult dog food as a source of protein at a level not to exceed 30% on an as-fed basis.

4. Move to OFFICIAL-T60.119 Dried Crickets
   60.119 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 (1). It is for use in adult dog food as a source of protein and fat consistent with good feeding practices.

   (1) Narguess H. Marei, Emtithal Abd El-Samie, Taher Salah, Gamal R. Saad, Ahmed H.M. Elwahy, Isolation and characterization of chitosan from different local insects in Egypt, International Journal

of Biological Macromolecules, Volume 82, 2016, Pages 871-877, ISSN 0141-8130, https://doi.org/10.1016/j.ijbiomac.2015.10.024

5. Move to OFFICIAL- T33.29(B) Black Soldier Fly Larvae Oil (**and adult cat food**)
   33.29 Black Soldier Fly Larvae Oil is the product obtained by mechanically extracting the oil from dried larvae of Black Soldier Fly, Hermetia illucens, that have been raised on a feedstock composed exclusively of feed grade materials. It is intended for use in swine and finfish feed and adult dog and adult cat 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."

6. Move to OFFICIAL-T51.17 Clam Meal
   51.17 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.

7. Move to OFFICIAL- T40.100(A) Recovered Retail Food (**and poultry feed**)
   40.100 Recovered Retail Food is composed of edible human food products safe and suitable for livestock feed and poultry feed that are collected from retail food establishments, domestic holding facilities, and domestic packing facilities. Permitted recovered retail foods are products from overstocks, lacking consumer acceptance, or beyond their sell-by date that include items such as bruised, cut, or overly ripe product (fruit and vegetables), bakery goods, eggs, and dairy products. It shall be safe and appropriately labeled for its intended use in accordance with good feeding practices and shall be free of material harmful to animals. Materials excluded from this definition include pet foods and products containing beef, lamb, pork, poultry, fish, or shellfish. It must not contain packaging materials (e.g. plastics, glass, metal, string, ~~Styrofoam,~~ polystyrene, cardboard, and similar materials), flowers, potted plants, or potting soil. The recovered foods shall be collected and intermixed in secure holding containers to exclude unauthorized addition of trash, materials harmful to animals, or infestation and adulteration by pests. Egg and dairy products (and other products ordinarily held at refrigerator temperatures) must be kept in cold storage until the scheduled pick-up. To minimize spoilage, the recovered retail food shall be collected at least weekly, or more frequently if necessary. The establishment should have a sanitation plan in place, and the containers should be cleaned and sanitized as necessary. The collected material may be further processed or delivered as is to an animal feeding facility. The product must be handled to preserve its safety and nutritional value.

8. Move to OFFICIAL T40.113 Dried Recovered Household Food

40.113 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%.

9. New TENTATIVE-33.29(C) Black Soldier Fly Larvae Oil **(poultry)**
   T33.29(C) 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 poultry, swine and finfish feed and adult dog and adult cat 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.

10. New TENTATIVE- T51.17(A) Clam Meal (**of clam species of human consumption**)
    T51.17A Clam Meal is the undecomposed, dried byproducts from shucking and processing operations of Spisula solidissima and/or Arctica islandica of clam species for human consumption. 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.

11. Editorial Change: Taxonomic reclassification to section 36.14, *Lactobacillus animalis* renamed to *Ligilactobacillus animalis*
    Text should be added at the end of the definition that states “date of compliance January 2027”
    Maggie Faba
    Edits: Lactobacillus animalis new text to follow is “renamed to Ligilactobacillus animalis (1).” Text should be added at the end of the definition that states “(1) date of compliance January 2027”.
    Ligilactobacillus animalis is to also be added as a stand-alone entry in 36.14.
    Editorial Change- Does not require membership vote.

12. Editorial Change: Taxonomic reclassification to definition 36.1 Condensed, Extracted Glutamic Acid Fermentation Product. Microorganism *Corynebacterium lilium* reclassified to *Corynebacterium glutamicum*. The current ingredient definition 36.1 in the 2024 AAFCO OP includes both

Corynebacterium lilium and *Corynebacterium glutamicum*. Ingredient definition 36.1 of the AAFCO OP shall be amended by deleting Corynebacterium lilium to reflect the updated nomenclature.
Edit: **36.1 Condensed, Extracted Glutamic Acid Fermentation Product** is a concentrated mixture of the liquor remaining from the extraction of glutamic acid, combined with the cells of **Corynebacterium lilium* or *Corynebacterium glutamicum* used to produce the glutamic acid. It is used or intended for use as follows: in poultry feed as a source of protein in the amount not to exceed 5% of the total ration; and in cattle feed as a source of protein in an amount not to exceed 20% of the feed. In order to assure safe use, the label and labeling of the additive shall bear the following:
(1) The name of the additive.
(2) A statement of the concentration of the additive contained in any mixture.
(3) Adequate directions for use.
(4) Non-protein nitrogen content must be guaranteed when present.
*** *Corynebacterium lilium* shall be deleted from this definition in January 2027 due to reclassification.**
Editorial Change- Does not require membership vote.

13. New- Section 101 GRAS Notices, AGRN 63 Purified Yeast Cell wall to be inserted into 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)
Generally Recognized As Safe, GRAS, For AGRN 63 (fda.gov) (PDF - 613 pages)	Phileo, Division of S.I. Lesaffre	Purified yeast cell wall	Purified yeast cell wall	Utility information not evaluated for GRAS, see FDA's letter for more information	All animals	10/4/23	FDA has no questions. (PDF - 3 pages)

14. Amendment to Technical Additives Table 73.001, Ethyl Cellulose
573.420 Ethyl cellulose- Recommend adding to the table the Classification of Food Additive Amendment of "Matrix scaffolding for tracers" and under Limitations or Restrictions "Not to exceed 80% of tracer"

15. Editorial Change to 57.265 Ammonium chloride
Change Caution statement in definition: ~~"CAUTION: Use only as directed. For ruminants (cattle, sheep, and goats) only."~~ "CAUTION: Use only as directed. For ruminants only."

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Editorial Change- Does not require membership vote.

16. Amendment to 57.166 – Chromium propionate (As a result of amendments made to the food additive 573.304)

57.166 Chromium propionate – 57.166 Chromium Propionate–The food additive chromium propionate may be safely used in animal feed as a source of supplemental chromium in accordance with the following prescribed conditions:

(a) The additive is manufactured by the reaction of a chromium salt with propionic acid, at an appropriate stoichiometric ratio, to produce triaqua-(mu3-oxo) hexakis (mu2-propionato-*O*,*O*′) trichromium propionate with the empirical formula, [Cr3(O)(CH3CH2CO2)6(H2O)3]CH3CH2CO2.

(b) The additive is added to feed as follows:

(1) In complete feeds for broiler chickens, **growing turkeys,** and swine at a level not to exceed 0.2 milligrams (mg) of chromium from chromium propionate per kilogram of feed.

(2) In cattle diets at levels not to exceed 0.5 mg of chromium from chromium propionate per kilogram of the complete feed. Chromium propionate must be premixed with dry ingredients prior to adding to high moisture ingredients or forages.

(3) In feed for horses at a level not to exceed an intake of 4 mg of chromium from chromium propionate per horse per day.

(c) The additive meets the following specifications:

(1) Total chromium content, 8 to 10 percent.

(2) Hexavalent chromium content, less than 2 parts per million (ppm).

(3) Arsenic, less than 1 ppm.

(4) Cadmium, less than 1 ppm.

(5) Lead, less than 0.5 ppm.

(6) Mercury, less than 0.5 ppm.

(7) Viscosity, not more than 2,000 centipoise.

(d) The additive shall be incorporated into feed as follows:

(1) It shall be incorporated into each ton of feed by adding no less than one pound of a premix containing no more than 181.4 mg of added chromium from chromium propionate per pound.

(2) The premix manufacturer shall follow good manufacturing practices in the production of chromium propionate premixes. Inventory, production, and distribution records must provide a complete and accurate history of product production.

(3) Chromium from all sources of supplemental chromium cannot exceed:

(i) A level of 0.2 ppm of the complete feeds for broiler chickens, **growing turkeys,** and swine;

(ii) A level of 0.5 ppm of the complete feed for cattle; and

(iii) An intake of 4 mg per horse per day.

(e) To assure safe use of the additive in addition to the other information required by the Federal Food, Drug, and Cosmetic Act:

(1) The label and labeling of the additive, any feed premix, and feed shall contain the name of the additive.

(2) The label and labeling of the additive and any feed premix shall also contain:

(i) A guarantee for added chromium content.

(ii) Adequate directions for use and cautions for use including these statements: "Caution: Follow label directions" and consistent with the directions for use, the following:

(A) **For feed for broiler chickens, growing turkeys, and swine,** "Chromium from all sources of supplemental chromium cannot exceed 0.2 parts per million of the complete feed**."** for broiler chickens and swine

(B) **For feed for cattle, "Chromium from all sources of supplemental chromium cannot exceed** and 0.5 parts per million of the complete feed for cattle."

(C) **For feed for horses,** "Chromium from all sources of supplemental chromium cannot exceed 4 milligrams per horse per day."

(21 CFR 573.304) (Adopted 2017 rev.1, Amended 2021**, 2025**)

17. New Common Foods to Include in CFI List:
    Rice (Oryza sativa varietals)
    Butternut squash
    Collard greens
    King oyster mushrooms
    Bell pepper
    Okra
    Maitake mushroom
    Editorial Change- Does not require membership vote. *Insert into CFI list on AAFCO.org webpage and in ODI

Board Action

None

Association Action

Make all editorial changes in next version of Chapter 6. Include new CFI items on webpage and ODI

MINUTES:

Committee Members Present: Erin Bubb, David Snell, Alan Keller, Ashlee-Rose Ferguson, Ashley Shaw, Bailey Whiten, Charlotte Conway, Cory Skier, Dan King, Dave Husner, Ely Walker, Falina Hutchinson, George Ferguson, James Embry, Jennifer Kormos,

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Jo Lynn Otero, Katie Simpson, KC Gutenberger, Kent Kitade, Kimberly Truett, Laura Scott, Maggie Faba, Marissa Kost, Mark LeBlanc, Nathan Price, Shannon Jordre, Stan Cook, Trish Dunn

Advisors Present: Aaron Hobbs, Amy Tryon DaPrato, Andrew Bish, Bill Bookout, Cathy Alinovi, Charles Starkey, Emily Helmes, Hunter Buffington, Jillian Nash, Katie Vassalli, Kristi Smedley, Leah Wilkinson, Leann Meyer, Patrick Fuling, Renee Streeter, Sarah Hubert

Not Present: Ali Kashani, Bernadette Mundo, Justin Hill, Tom Phillips, Dave Dzanis, Jean Hofve, Joe Ward, Julia Fidenzio, Tim Law

1. CALL TO ORDER

There being a quorum present, and adequate and proper notice of the meeting having been given, the meeting was called to order at 1:15 p.m.

2. WELCOME AND OPENING REMARKS

Erin Bubb welcomed the attendees to the meeting.

3. INVESTIGATOR RECOMMENDATIONS

On a motion made by Dave Husner, seconded by Mark LeBlanc, it was resolved to move to Official-T60.117 (A) Dried Black Soldier Fly Larvae (finfish). **Motion carried.**

On a motion made by Trish Dunn, seconded by Mark LeBlanc, it was resolved to move to Official-T60.120 Dried Chicory Root Pulp. **Motion carried.**

On a motion made by David Snell, seconded by Trish Dunn, it was resolved to move to Official-T60.121 Dried Mealworm Meal. **Motion carried.**

On a motion made by Alan Keller, seconded by David Snell, it was resolved to move to Official-T60.119 Dried Crickets. **Motion carried.**

On a motion made by David Snell, seconded by Mark LeBlanc, it was resolved to move to Official-T33.29(B) Dried Black Soldier Fly Larvae Oil (and adult cat food) to replace the current definition 33.29. **Motion carried.**

On a motion made by Alan Keller, seconded by David Snell, it was resolved to move to Official-T51.17 Clam Meal. **Motion carried.**

On a motion made by David Husner, seconded by Mark LeBlanc, it was resolved to move to Official-T40.100(A) Recovered Retail Food (and poultry feed). **Motion carried.**

On a motion made by David Husner, seconded by Trish Dunn, it was resolved to move to Official T40.113 Dried Recovered Household Food. **Motion carried.**

On a motion made by David Snell, seconded by Mark LeBlanc, it was resolved to move to new Tentative T33.29(B) Dried Black Soldier Fly Larvae Oil (poultry). **Motion carried.**

On a motion made by Allan Keller, seconded by David Husner, it was resolved to move to new Tentative, Clam Meal, T51.17(A), as presented. **Motion carried.**

On a motion made by Maggie Faba, seconded by Mark LeBlanc, it was resolved to accept the editorial change to rename 36.14 "Lactobacillus animalis" to "Ligilactobacillus animalis," and to add text at the end of the definition that states "date of compliance January 2027," as presented. **Motion carried.**

On a motion made by Maggie Faba, seconded by Trish Dunn, it was resolved to accept the editorial change to 36.1 Extracted Glutamic Acid Fermentation Product to delete "Corynebacterium lilium" with a footnote to sunset "Corynebacterium lilium" by January 2027, as presented. **Motion carried.**

On a motion made by Nathan Price, seconded by Alan Keller, it was resolved to insert AGRN No. 63 purified yeast cell wall into Table No. 101 GRAS Notices, in the OP, as presented. **Motion carried.**

On a motion made by Shannon Jordre, seconded by Falina Hutchinson, it was resolved to approve the New Feed Term-Total Mixed Ration (TMR).

Discussion: *The Committee and open forum participants discussed the reason for developing the new feed term "Total Mixed Ration." Leah Wilkinson noted the inconsistency of the proposed term and industry and academic definitions and questioned the reference to drugs in feed terminology.*

On a motion made by David Snell, seconded by David Husner, it was resolved to **table the above motion** to approve the New Feed Term-Total Mixed Ration (TMR) until the October 2024 meeting. **Motion carried.**

ACTION – Leah Wilkinson of the American Feed Industry Association will provide the references for industry and academic definitions of TMR to Shannon Jordre.

ACTION – Shannon Jordre will consult with Ali Kashani regarding the definition of TMR.

On a motion made by David Snell, seconded by Trish Dunn, it was resolved to approve the amendment to Technical Additives Table 73.001, Ethyl Cellulose using the language presented. **Motion carried.**

On a motion made by Jennifer Kormos, seconded by Dave Husner, it was resolved to approve the editorial change to 57.265 Ammonium Chloride definition to update the cautionary statement as presented. **Motion carried.**

On a motion made by Jennifer Kormos, seconded by David Snell, it was resolved to amend 57.166 Chromium Propionate definition as presented. **Motion carried.**

Tabled Motions for T51.19 Fish and T51.20 Shellfish did not get picked up by committee. Motions died. The committee will consider new tentative definitions at the October 2024 virtual IDC meeting.

4. COMMON FOOD INDEX (CFI) SUBCOMMITTEE

On a motion made by David Husner, seconded by Trish Dunn, it was resolved to accept the minutes of the CFI Subcommittee meeting held on June 13, 2024. **Motion carried**.

On a motion made by Katie Simpson, seconded by David Snell, it was resolved to accept the seven ingredients into the common food index recommended by the CFI Subcommittee, as presented.

Discussion: *The report provided details of the recommendations of the CFI Subcommittee to accept the seven ingredients as published as new common food items in the common food index.*

George Ferguson reviewed the list of ingredients that were submitted for consideration during the submission period for the CFI, and which did not meet status as determined by the Subcommittee. He outlined the reason for the decline and reviewed the process of responding to the submitter on the Subcommittee's feedback. George Ferguson confirmed that the cumulative ingredient list is maintained in SharePoint.

The Committee discussed the processing of the items on the list, which comprises a reference list of ingredients with some that have been minimally processed but not to the extent that they are nutritionally altered. The Committee recognized that the classification of when an ingredient is nutritionally altered can sometimes be a point of discussion.

It was noted that once the committee minutes are accepted by the Board, the new CFI list will be published online at aafco.org.

Under conclusion of the discussion motion carried. George Ferguson abstained.

5. NEW DISCUSSION

A. The committee discussed the next steps for the IDC after the FDA/AAFCO MOU expires October 1st, 2024.

On a motion made by Erin Bubb, seconded by David Snell, it was resolved to establish a work group to begin examining Chapter Six guidelines for ingredient definitions and developing language to accept the FDA's new Animal Food Ingredient Consultation (AFIC) process to be presented at the October virtual committee meeting **Motion carried.**

B. The Committee members discussed whether the Committee should draft a recommendation for the regulatory discretion of new animal drugs under an FDA enforcement discretion. The Committee decided to wait for the results of the Enforcement Issues Committee discussion and possible recommendation before proceeding.

6. WORK GROUPS UPDATE

6.1 Animal Protein Work Group

Stan Cook reported that the Animal Protein Work Group was working on the definitions of meat meal, and meat and bone meal and have uncovered a lack of analysis of ash and urged the sharing of data. Charles Starkey agreed to accumulate industry data on meat, and meat and bone meal content.

6.2 Spent Bleaching Clay Work Group

On a motion made by David Snell, seconded by Trish Dunn, it was resolved to accept the Spent Bleaching Clay Work Group report and recommendations as presented, and to disband the Spent Bleaching Clay Work Group. **Motion carried**.

David Snell noted that the Spent Bleaching Clay Work Group report had been posted. Investigators will follow up with the work group recommendations and present them at the October virtual meeting for consideration by the committee.

**The AAFCO IDC Spent Bleaching Clay (SBC) Working Group proposes the review and approval of several oilseed meal ingredient definitions in the AAFCO Official Publication (OP) to ensure the continued elective practice of allowing oilseed meal producers to add SBC onto the meal from which the oil was derived, as described in SUIP #6.*

6.3 Fluorine/Fluoride Work Group

On a motion made by Jennifer Kormos, seconded by David Snell, it was resolved to accept the report and recommendations of the Fluorine Work Group.

**This WG recommends that an explanatory **note be placed at the beginning of Section 57 (Mineral Products) of Chapter 6 of the AAFCO OP. Most of the specifications or guarantees for fluorine are found in the mineral product definitions (approximately 20 definitions).*

In addition, the WG recommends that this explanatory note be placed in Chapter 5 of the OP as a note in the AAFCO Analytical Variations (AVs) section/table as well as Chapter 4 – Model Regulations Under the Model Bill, Regulation 10. Adulterants, where fluorine is mentioned as an adulterant at certain levels for consideration by the LMSC and the MBRC.

At this time, the WG is not recommending that fluorine be changed to fluoride in the OP. The explanatory note should be sufficient.

***Note: the AOAC Official Method 975.08 Fluorine in Animal Feed (Ion Selective Electrode Method) was developed to analyze for fluoride in animal feed, but the results of the method are to be expressed as or reported as fluorine. This means that the method actually detects fluoride and not fluorine. Therefore, guarantees or specifications for fluorine are actually for fluoride.*

Discussion: *The Committee discussed with the open session participants about the variance in laboratory reporting of fluoride as fluorine, and the potential to develop a long-term plan to better clarify fluorine and fluoride reporting.*

On a motion made by David Snell, seconded by Alan Keller, it was resolved to **table the motion** to accept the report and recommendations of the Fluorine Work Group for discussion at the October 2024 meeting. **Motion carried**.

6.4 As-Fed/As-Is Terminology Work Group

Charlotte Conway reported on the As-Fed/As-Is Terminology Work Group, which is chaired by Ciro Ruiz-Feri. She noted that the Work Group has been active and will prepare a report to present at the October 2024 Committee meeting or at the meeting to be held in early 2025.

7. PARKING LOT/ACTIONS NEEDED

The Committee tabled the discussion on this item to the next meeting.

8. PRESENTATION – MARY-GRACE DANAO, HIGH PRESSURE PASTEURIZATION (HPP).

Erin Bubb introduced the speaker, Research Associate Professor Dr Mary Grace Danao of the University of Nebraska. Dr Mary Grace Danao reviewed the definition of HPP, the governing principles, the HPP batch process, the type of equipment, innovations in automation, validation study design, and best practices in HPP.

9. NEXT MEETING

The next meeting will be tentatively held on October 17, 2024, via videoconference.

10. ADJOURNMENT

On a motion made by Mark LeBlanc, seconded by Charlotte Conway and carried, it was agreed that there was no further business to transact; the meeting closed at 3:50 p.m.

Attach Work Group Reports:
Spent Bleaching Clay
Fluorine/Fluoride
CFI Subcommittee

Recommended Status

CFI_ID	Name of Ingredient:	Status
CFI_1052	Rice (Oryza sativa varietals)	Recommended
CFI_1062	Butternut Squash	Recommended
CFI_1063	Collard Greens	Recommended
CFI_1064	king oyster mushroom	Recommended
CFI_1065	Bell pepper	Recommended
CFI_1084	okra	Recommended
CFI_1090	maitake mushroom	Recommended

Not Recommended Status

CFI_ID	Name of Ingredient:	Status	NR Comments
CFI_1053	Brown Rice	Not Recommended	The subcommittee has combined Rice and Brown Rice and recommended to the IDC that they be added to the CFI as a single entry under the name Rice (Oryza sativa varietals).&%23160;&%23160;
CFI_1055	Konjac	Not Recommended	This item is not appropriate for inclusion in the CFI because it is not a common food for humans or animals in the United States and it requires significant processing for its use as a food. The corm (tuber) part of the plant is typically processed into flour or used as a gum-type substance, and it is not typically eaten raw because it contains calcium oxalate crystals.
CFI_1074	beet root	Not Recommended	The item already exists as Red Beets on the CFI. &%23160;The SC further noted that they will seek to rename the current "Red Beets" to Beet, in order to provide consistency with items already in the OP.

Does Not Meet Status

CFI_ID	Name of Ingredient:	Status	Reason For Decline
CFI_1032	E124	Does Not Meet	The answers provided are both inconsistent and insufficient to allow for proper consideration.
CFI_1033	Dried Grape Pulp	Does Not Meet	The proposed food item is not considered a common food as it is not whole but rather a fraction of a whole food that has been further manufactured. Additionally, the proposed food item is part of a larger AAFCO defined ingredient that can be found in chapter 6 of the AAFCO OP, definition 40.112 (*blank – fruit) Pomace.
CFI_1034	Vegetable fiber	Does Not Meet	The subcommittee's determination was based on upon two critical factors, the naming of the food item and the additional/further manufacturing required to produce it. The name "Vegetable Fiber" does not limit the item to a single plant source, thus creating an unacceptable collective term.
CFI_1040	Turkey Tail Mushroom	Does Not Meet	Therapeutic health claims and not listed as foundation foods on USDA FoodData Central, KS.
CFI_1041	Solomon Seal Root (Polygonatum biflorum)	Does Not Meet	The product is not common, and the proposed uses are noted as therapeutic, not nutritional.
CFI_1042	Bentonite	Does Not Meet	Already in the OP, 73.040
CFI_1054	Fructose or Sugar (fructose)	Does Not Meet	Fructose, as an isolated monosaccharide, would be considered a fractionated/refined product, and as such does not meet the criteria for inclusion in the Common Food Index.
CFI_1056	Dextrin	Does Not Meet	The food item is a fraction of whole ingredients that must first undergo additional manufacturing steps. Aditionally, since this item is listed in the CFR as a human food item, it would stand to reason that a FAP approval would also be necessary in order to approve for use in animal feeds.
CFI_1057	Dextrose monohydrate	Does Not Meet	The food item is a fraction of whole ingredients that must first undergo additional manufacturing steps. Aditionally, since this item is listed in the CFR as a human food item, it would stand to reason that a FAP approval would also be necessary in order to approve for use in animal feeds.
CFI_1058	Dextrose	Does Not Meet	The food item is a fraction of whole ingredients that must first undergo additional manufacturing steps. Aditionally, since this item is listed in the CFR as a human food item, it would stand to reason that a FAP approval would also be necessary in order to approve for use in animal feeds.

Does Not Meet Status

CFI_1059	chicken, fish	Does Not Meet	
CFI_1067	applesauce	Does Not Meet	Apples are already included in the CFI and "ground" is a defined process in Chapter 6 of the AAFCO OP, thus ground apples would already be included in the CFI.
CFI_1069	Manuka Honey	Does Not Meet	The indications for intended medicinal use as provided in the General Description statement.
CFI_1070	Galactooligosaccharide	Does Not Meet	The ingredient is not a common food as it must be synthetically produced and has a stated intended purpose other than nutrition.
CFI_1071	beef liver	Does Not Meet	The proposed ingredient is already an approved ingredient as defined in Chapter 6 of the AAFCO OP.
CFI_1072	chestnut	Does Not Meet	Currently available scientific data suggests that chestnuts come in multiple varieties, many of which are noted to be toxic to one or more species of animals.
CFI_1073	passion fruit	Does Not Meet	Publicly available information indicates there may be safety concerns with cyanogenic glycosides in the skin and seeds of the ingredient. Additionally, you have stated that current safety data is not available for the ingredient.
CFI_1075	spirulina	Does Not Meet	There is already an established precedence for these ingredients to be reviewed and approved as Food Additives under FDA's Food Additive Petition process.
CFI_1076	nettles	Does Not Meet	The sub-committees research into "Nettles" produced several potential identity and safety questions. Additionally, certain varieties of nettle are deemed as noxious and/or prohibited weeds within several states.
CFI_1081	Moringa Powder	Does Not Meet	The indications for intended medicinal use as provided in the General Description statement and intent to make therapeutic claims.
CFI_1082	Olive flavor	Does Not Meet	The submitted item is not a whole food, but rather a fraction of a food item that is the result of a refining process.
CFI_1083	Date Syrup	Does Not Meet	The submitted item is manufactured by refining another ingredient, thus also making it a fraction of the complete food item.
CFI_1085	butter	Does Not Meet	Butter, as defined under 21 US Code 321a is not always a single ingredient item.
CFI_1086	cod liver	Does Not Meet	The item is already defined in Chapter 6 of the AAFCO OP, (51.10) fish by-product.
CFI_1087	sauerkraut	Does Not Meet	The submitted food item requires further processing (fermenting) of an item that is already included in the CFI as well as the addition of other ingredients.

Does Not Meet Status

CFI_1088	Water Lentil (AKA Duckweed)	Does Not Meet	Duckweed is considered an invasive species throughout much of the United States and as such would require it be subjected to an environmental impact review. For items such as duckweed, the proper path for acceptance as an animal food ingredient would be to submit it through the AAFCO Ingredient Definition process.
CFI_1089	Corn Starch	Does Not Meet	The product is a refined/fractionated product that must undergo one or more manufacturing processes prior to being available in its final form.
CFI_1092	Sea moss and Irish moss Chondrus crispus	Does Not Meet	Red Algae is already defined in the OP under 60.76, Dried Seaweed Meal. Any additional families other than those defined in the OP must be reviewed for inclusion under the AAFCO Ingredient Definition Process.
CFI_1096	Sardines	Does Not Meet	The submitted item is part of the group "Fish" which is currently being considered as a defined term in the AAFCO OP, Terms and Definitions section.
CFI_1097	Butter squash	Does Not Meet	Our review has determined that this food product has been previously submitted for consideration under the name "Butternut Squash" which is currently out for public comment.
CFI_1098	Freeze Dried Saskatoon Berry Powder	Does Not Meet	The food item as submitted is not a whole food and must undergo multiple manufacturing steps.
CFI_1099	Milled Saskatoon Berry Pomace	Does Not Meet	The submitted food item requires a manufacturing process that results in a fractionated product, and not a whole food/fruit.
CFI_1100	SP50CO SNAP	Does Not Meet	The submitted product is intended as a processing aid in manufacturing and not as a nutritional food, and as such would not be a common food. Additionally, the product is a blend of multiple ingredients and have each undergone manufacturing steps.
CFI_1101	Brewers malted barley	Does Not Meet	The submitted food item is already established in the AAFCO OP's Chapter 6, Terms and Definitions of Feed Ingredients, Section 15, Brewery Products.
CFI_1106	Blueberries	Does Not Meet	The Blueberry is already listed on the Common Food Index. Please see the current CFI listing by visiting https://www.aafco.org/document/committees/ingredient-definitions-committee/resources/common-food-index/common-food-index-as-of-101923/

Deleted Status

CFI_ID	Name of Ingredient:	Status	Reason For Decline
CFI_1018	nuevo formato para mascotas	Deleted	Spam
CFI_1038	Harina de carne res	Deleted	Spam
CFI_1039	Deer meet, 3 year old pork roast	Deleted	Spam
CFI_1060	GREEN PEAS	Deleted	The submission was determined to be an attempt to ask a question, not to submit a proposed ingredient.
CFI_1061	•Raw chicken breast: 20g •Raw chicken liver: 20g •Raw chicken leg: 40g •Seaweed powder 5g •Tricalcium phosphate 1g •Taurine 1g •Cod Liver oil 1g	Deleted	Spam
CFI_1066	Green Tea Extract, Honeysuckle Extract, Stevia Extract, Mint Extract, Lemon Extract	Deleted	Not a submission but rather a consumer question. Consumer was directed to submit AAFCO questions to AAFCO@AAFCO.Org.
CFI_1068	Bell Peppers	Deleted	This item was entered twice by the same submitter. Please see CFI_1065.
CFI_1077	2.75 cups oat flour	Deleted	Spam
CFI_1091	dnfk@naver.com	Deleted	SPAM
CFI_1093	PET FOOD	Deleted	SPAM

Spent Bleaching Clay Workgroup Report

5-July-2024

Summary

The AAFCO IDC Spent Bleaching Clay (SBC) Working Group proposes the review and approval of several oilseed meal ingredient definitions in the AAFCO *Official Publication* (OP) to ensure the continued elective practice of allowing oilseed meal producers to add SBC onto the meal from which the oil was derived, as described in SUIP #6.

Workgroup Charge

During August 2023, AAFCO's Model Bills & Regulations Committee (MBRC) approved a recommendation to remove provisions for SBC as listed under Chapter 5, Statements of Understanding & Interpretation of Policy section of the OP (SUIP #6):

> "*Spent Bleaching Clay is bleaching clay which is derived from acid treated montmorillonite and used to clarify refined vegetable oil (corn, soy, cottonseed, peanut and canola oil) may be added to the oilseed meal, from which the oil is derived, at a maximum rate of 0.2 percent. The spent bleaching clay may contain color bodies, phospholipids and soaps." (AAFCO 2024 OP, Chapter 5, SUIP #6)*

The MRBC recommendation and existing SBC provisions were then referred to AAFCO's Ingredients Definition Committee (IDC) for consideration as to whether SBC should be incorporated as a feed ingredient or feed term elsewhere within the OP. In turn the IDC formed a working group to develop a recommendation for how to address this issue.

Workgroup Recommendations

At this time, members of the AAFCO SBC Working Group are proposing review and approval of the following revisions, which if adopted, would be published in the AAFCO OP:

1) Revise Ingredient Definitions:

24.14 Ammoniated Cottonseed Meal is obtained by the treatment of cottonseed meal with anhydrous ammonia until a pressure of 50 pounds per square inch gauge is reached. It is to be used in the feed of ruminants as a source of protein and/or as the sole source of non-protein nitrogen in an amount not to exceed 20% of the total ration.

The label of the additive and of any feed additive supplement, feed additive concentrate, or feed additive premix prepared therefrom, must contain the following information in addition to any other required information:

(1) The name of the additive

(2) The maximum percentage of equivalent crude protein from non-protein nitrogen

(3) Directions for use to provide not more than 20% of the additive in the total ration and a prominent statement: "Warning – This feed should be used only in accordance with the directions furnished on the label." (Reg. 573.140)

Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. (Proposed 1969, Published 1970, Amended 2025)

IFN 5-09-352 Cotton seeds meal solvent extracted ammoniated

24.10 Cottonseed Meal, Mechanical Extracted, is the product obtained by finely grinding the cake, which remains after the removal of most of the oil from the cottonseed by a mechanical extraction process. It may contain an inert, non-toxic conditioning agent either nutritive or non-nutritive or any combination thereof, to reduce caking and improve flowability in an amount not to exceed that necessary to accomplish its intended effect and in no case exceed 0.5%. The name of the conditioning agent must be shown as an added ingredient. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. The words "mechanical extracted" are not required when listing as an ingredient in a manufactured feed. (Proposed 1984, Published 2002, Amended 2025).

IFN 5-01-625 Cottonseed meal mechanical extracted 36% protein

24.12 Cottonseed Meal, Solvent Extracted, is the product obtained by finely grinding the flakes, which remain after

removal of most of the oil through a solvent extraction process. It must contain not less than 36% crude protein. It may contain an inert, non-toxic conditioning agent either nutritive or non-nutritive or any combination thereof, to reduce caking and improve flowability in an amount not to exceed that necessary to accomplish its intended effect and in no case exceed 0.5%. The name of the conditioning agent must be shown as an added ingredient. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. The words "solvent extracted" are not required when listing as an ingredient in a manufactured feed. (Proposed 1984, Published 2002, Amended 2025).
IFN 5-01-632 Cotton seeds meal solvent extracted 36% protein

48.22 Corn Germ Meal (Dry Milled) is ground corn germ which consists of corn germ with other parts of the corn kernel from which part of the oil has been removed and is the product obtained in the dry milling process of manufacture of corn meal, corn grits, hominy feed, and other corn products. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. (Definitions combined 1960, Amended 2025)
IFN 5-02-894 Maize germs meal dry milled mechanical extracted

48.23 Corn Germ Meal (Wet Milled) is ground corn germ from which most of the solubles have been removed by steeping and most of the oil removed by hydraulic, expeller, or solvent extraction processes, and is obtained in the wet milling process of manufacturer of corn starch, corn syrup, or other corn products. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. (Proposed 1960, Published 1961, Amended 2025)
IFN 5-02-897 Maize germs without extractives meal wet milled mechanical extracted
IFN 5-02-898 Maize germs without extractives meal wet milled solvent extracted

71.7 Peanut Meal and Hulls, Mechanical Extracted and Solvent Extracted,** is a product of shelled peanuts, composed principally of the kernels and hulls, with such portion of the oil, as may be left in the ordinary course of manufacturer. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. (Published 1978, Amended 2025)
IFN 5-03-655 Peanut pods with seeds meal mechanical extracted
IFN 5-03-656 Peanut pods with seeds meal solvent extracted

71.9 Peanut Meal, Mechanical Extracted and Solvent Extracted,** is a ground product of the shelled peanuts, comprised principally of the kernels, with such portion of the hull, or fiber, and oil as may be left in the ordinary course of manufacturer. It must contain no more than 7% crude fiber. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. (Published 1978, Amended 2025)
IFN 5-03-649 Peanut seeds without coats meal mechanical extracted
IFN 5-03-650 Peanut seeds without coats meal solvent extracted

71.40 Low Glucosinolate High Erucic Acid Rapeseed Meal, Solvent Extracted, ** is the meal obtained after the removal of most of the oil by the prepress solvent 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 and 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. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. It must contain a maximum of 2% 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, in accordance with good feeding practices. (AAFCO 2025 OP § 71.40)

71.77 Canola Meal is the low erucic acid, low glucosinolate meal obtained after the removal of most of the oil by mechanical extraction, or by direct solvent or prepress solvent extraction of whole seeds obtained from the genus *Brassica* (*Brassica napus*, *Brassica rapa*, or *Brassica juncea*) from which the oil shall contain less 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. Spent bleaching clay, as listed in 73.001 Technical

Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. It must contain 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, in accordance with good feeding practice. (AAFCO 2025 OP § 71.77)

84.61 Soybean Meal, Solvent Extracted is the product obtained by grinding the flakes which remain after removal of most of the oil from soybeans by a solvent extraction process. It must contain not more than 7.0% crude fiber. It may contain calcium carbonate or an anti-caking agent not to exceed 0.5% as defined in Section 73 (Technical Additives) to reduce caking and improve flowability. The name of the conditioning agent must be shown as an added ingredient. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. The words "Solvent Extracted" are not required when listing as an ingredient it a manufactured feed. (AAFCO 2025 OP § 84.61)

84.7 Soybean Meal, Dehulled, Solvent Extracted is obtained by griding the flakes remaining after removal of most of the oil from dehulled soybeans by a solvent extraction process. It must contain not more than 3.5% crude fiber. It may contain calcium carbonate or an anti-caking agent not to exceed 0.5 percent as defined in Section 73 (Technical Additives) to reduce caking and improve flowability. The name of the conditioning agent must be shown as an added ingredient. Spent bleaching clay, as listed in 73.001 Technical Additives Table, may be added to the meal from which the oil is derived at no more than 0.2%. When listed as an ingredient in a manufactured feed it may be identified as "Dehulled Soybean Meal." The words "Solvent Extracted" are not required when listing as an ingredient it a manufactured feed. (AAFCO 2025 OP § 84.7)

2) Add line item for SBC in Table 73.0001:

Name	FDA Regulation	Classification Under Food Additives Amendment	Limitations or Restrictions
Spent Bleaching Clay		Processing aid derived from montmorillonite clay, attapulgite clay, diatomaceous earth, or silicon dioxide used to clarify refined vegetable oils.	'*May only be used in select oilseed meals according to each ingredient definition*' May contain color bodies, phospholipids, and soaps.

As proposed, the working group anticipates that these revisions would ensure the elective use of SBC is retained following AAFCO adoption of MRBC recommendation to remove SUIP #6 from the OP, and without any disruption or change to current U.S. oilseed meals market conditions/practices.

Workgroup Participants

- David Snell (AAFCO Technical Additives Investigator, Working Group Chair)
- Falina Hutchinson (AAFCO Oilseeds Investigator)
- Dave Edwards (FDA, AAFCO Representative)
- Leah Wilkinson (AFIA, AAFCO Feed Manufacturing Industry Advisor)
- Katie Vassalli (NOPA, AAFCO Oilseed Industry Advisor)
- Brittany Wood (COPA, Canola Industry Working Group Representative)

Additional Background:

SUIP #6 was first adopted nearly 30 years ago following a petition submitted by L.A. Salomon Inc. to AAFCO, asking about the acceptability of adding SBC to oilseed meals used in animal feeds as an alternative to disposing of it in landfills. Then, NOPA tested fresh and spent clays for heavy metals and submitted data to AAFCO which demonstrated that the

ash and oil content of the spent clay, when added at a rate of 0.2 percent or less, did not change the nutritional or physical characteristics of the meal.

Based on a review of this data, FDA determined that spent clay material can be safely added back to the oilseed meal at a maximum rate of four pounds per one ton of meal (0.2 percent) noting that at this level, "…the amount would be minor and not result in changes that would affect the value (economic adulteration) of the meal."

Thus, in 1996, AAFCO formally adopted the inclusion of SUIP 6 (as stated above). Nearly 20 years later, in 2012, FDA further clarified that that the anticaking agent allowance (0.5 percent) under the AAFCO definition for soybean meal (OP 84.7) is separate and apart from – and additive to – the SBC allowance (0.2 percent) in meal under SUIP 6 and that no additional labeling was required.

Importantly, SUIP #6 provides oilseed processors operational flexibility to electively add a specific amount of spent bleaching clay from the refining process into oilseed meal products, a standard practice that is predominantly utilized at processing plants that are co-located with oil refineries. Based on industry reporting, NOPA estimates that approximately 50% of U.S. soybean meal and 14% of U.S. canola meal contains SBC as a result of this practice and in Canada, SBC is included in nearly all canola meal.

Workgroup Completion Date: 5-July-2024

Fluorine/Fluoride Working Group Report and Recommendation

June 26, 2024

WG members:

Charlotte Conway (DAFI, CVM, U.S. FDA)
Ken Bowers (Kansas Dept. of Agriculture, FFIMC rep.)
Stan Cooke (AAFCO life member)
Mary Koestner (Missouri Dept. of Agriculture, PTP rep.)
Tim Fau (Quality Assurance Specialist, Nutrien, Industry rep.)
Tom Philips (Maryland Dept. of Agriculture, LMSC rep.)
Jennifer Kormos (CFIA, IDC rep.)

WG Meetings:

February 16th 2023
September 25th 2023
February 26th, 2024
May 30th, 2024

Charge of this WG:

This WG was tasked with looking at the analytical methods available for detecting fluorine in animal feed as well as the capability of labs (regulatory labs) to test for fluorine and what methods they were using. This request was the result of an issue in one of the States where high levels of fluorine were found in a mineral product for dairy cattle, which lead to discussions with the firm on the analytical results and how fluorine levels were actually reported. It has become clear that there is a limited number of regulatory labs that test for this analyte in animal feed. The AOAC 975.08 method is commonly used to test for fluorine in animal feed, this method detects fluoride, but reported as fluorine. This WG was also tasked with seeing if changes need to be made within the AAFCO OP. For example, if some type of explanatory note is needed to clarify that the validated method for determining fluorine is actually detecting fluoride and reporting it as fluorine and/or if where the standards, specifications or guarantees for fluorine are mentioned, it should be replaced with fluoride in the AAFCO OP.

Summary of WG Report:

This WG met a total of 4 times in 2023 and 2024. The meeting minutes from most of the WG meetings are found below.

Our initial discussions focussed on what analytical methods are available to detect for this analyte in animal feed and what regulatory labs actually test for it. There are very few regulatory labs that test for this analyte and the labs (regulatory or private labs) that

do test for it use the AOAC 975.08 method – Fluorine in Animal Feed (Ion Selective Electrode Method). This WG was hoping to obtain some historical information on the decision to detect fluoride, but report it as fluorine. Unfortunately, we were not able to get any historical information on this reporting decision.

The WG is well aware that there is a minimal difference between fluoride and fluorine, but it is actually not correct when it is stated fluorine and not fluoride.

The WG decided that the best option would be to include an explanatory note in the AAFCO OP where fluorine is mentioned. This note would inform and bring awareness to everyone that even though fluorine is being reported (and there are specifications, standards, and guarantees for fluorine), it is actually fluoride that is being tested for in the feed using the AOAC method.

The WG was hesitant in making any additional changes, that is replacing fluorine with fluoride in the ingredient definitions found in section 57 (mineral products) of the AAFCO OP or other sections of the OP where fluorine is mentioned. The WG is aware and hesitant if we start making changes and replacing fluorine to fluoride (guarantees for fluoride, specifications for fluoride), as this will likely have implications internationally, as standards, specifications, etc. are set for fluorine not fluoride,

WG recommendation to IDC:

This WG recommends that the explanatory note (see below) be placed at the beginning of Section 57 (Mineral Products) of Chapter 6 of the AAFCO OP. Most of the specifications or guarantees for fluorine are found in the mineral product definitions (approximately 20 definitions).

In addition, the WG recommends that this explanatory note be placed in Chapter 5 of the OP as a note in the AAFCO Analytical Variations (AVs) section/table as well as Chapter 4 – Model Regulations Under the Model Bill, Regulation 10. Adulterants, where fluorine is mentioned as an adulterant at certain levels for consideration by the LMSC and the MBRC.

At this time, the WG is not recommending that fluorine be changed to fluoride in the OP. The explanatory note should be sufficient.

Explanatory note:

Note: the AOAC Official Method 975.08 Fluorine in Animal Feed (Ion Selective Electrode Method) was developed to analyze for fluoride in animal feed, but the results of the method are to be expressed as or reported as fluorine. This means that the method actually detects fluoride and not fluorine. Therefore, guarantees or specifications for fluorine are actually for fluoride.