



Committee Report

2025 AAFCO Annual Meeting
8/5/25, 10:45 pm, Omaha, NE

Committee Activities

- 1) ACTION: SUIP #7 Updated Proposal to MBRC from SUIP WG – **Cathy Alinovi** (Attachment A)
- 2) ACTION: SUIP #9 Dried Insect for Wild Bird Food be amended to include “Specialty Pets” – **Erin Bubba/Aaron Hobbs** (Attachment B)
- 3) ACTION: Charge from BOD: Review the numbering system for current SUIP’s, as well as deleted SUIP’s, within the Official Publication, and to come up with a system that more closely resembles ingredient definitions so that they can be easily referenced and maintained historically.
- 4) ACTION: License Fees – Dan King?
- 5) ACTION: Raw Milk for pet food?



AAFCO
Association of American Feed Control Officials

Appendix A: SUIP #7 Updated Proposal to MBRC from SUIP WG

Current SUIP 7 (2024 AAFCO OP, p. 242-5):

7. **Chews, Bones, and Toys for Pets and Specialty Pets** - The following products, whether flavor-coated or unflavored, shall be exempt from registration and labeling, 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”).

(Adopted 1989, Amended 1996, 2001, 2004, 2007, 2008)

NOTE: Labeling information required by the Code of Federal Regulations are applicable to the labeling of all these products:

- All chews, bones, toys and exercisers made of animal skin, hide, wood, or man-made material
- Hooves
- Ears
- Animal Bones
- Ligaments
- Snouts
- Pizzles

Rawhide generally refers only to beef, and many of these chews use other types of animal skins or hides.

New Proposal to MBRC from SUIP WG: Incorporate SUIP:

When used in this Act: ...

(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 **and are not adulterated within the meaning of Section 7(a) of this Act:**

i. Unmixed whole seeds and physically altered entire unmixed seeds, when such whole or physically altered seeds are not chemically changed

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.~~

iii. All chews, bones, toys and exercisers made of animal skin, hide, wood, or man-made 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”)

NOTE: Labeling information required by the Code of Federal Regulations are applicable to the labeling of all of these products



Appendix B: SUIP #9 Dried Insect for Wild Bird Food be amended to include “Specialty Pets”

Dried Insects for Wild Bird Food and Insectivorous Specialty Pets - Insects, all life stages, that are commonly consumed in the wild by wild birds and/or insect eating specialty pets may be reared and dried for use in commercial wild bird feed and insectivorous specialty pet diets. These insects are considered common food. The dried insects must be feed grade. The label must include the appropriate common name of the insect. Example: Black Soldier Fly Larvae.