AAFCO
Association of American Feed Control Officials

Contents

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ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS (AAFCO)
1800 SOUTH OAK STREET, SUITE 100
CHAMPAIGN, ILLINOIS

MINUTES OF THE ANIMAL FEED COMMITTEE ANNUAL MEETING
HELD AT THE HILTON OMAHA
1001 CASS STREET
OMAHA, NEBRASKA
AUGUST 5, 2025, 8:35 A.M. CT

MEMBERS:

Jamie Good (Co Chair)	Amy Penot	Lizette Beckman (via teleconference)
Jessica Gore (Co Chair; via teleconference)	Justin Hill	Jamie Spencer
Bailey Whiten	Dragan Momcilovic (via teleconference)	Jordan Mancini
	Lisa Fantelli (via teleconference)	Charles Hubenka

ADVISORS:

Bill Bookout	Jay Stapp	Renee Streeter
Charles Snarkey	Patrick Fulling	Emily Helmes
Cathy Alinovi	Patrick Tovey	Stephanie Adams
Chris Olinger	Dan Frank	

GUESTS:

Trish Dunn	Office of the Indiana State Chemist
Lori Goshert	Recording Secretary, Minutes Solutions Inc. (via teleconference)

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 8:35 a.m.

2. NEW COMMITTEE STRUCTURE AND PURPOSE STATEMENT

Jamie Good noted that the Animal Feed Committee was formed by combining the former Feed and Feed Ingredient Manufacturing Committee and the former Feed Labeling Committee. Its purpose is to provide a forum for regulators, industry, and other stakeholders to monitor, review, and recommend appropriate revisions to the AAFCO Official Publication (OP) as related to commercial feed, excluding pet food. It also includes, but is not limited to, labeling and manufacturing, to protect animal and human health, and to promote a structure for orderly commerce within the industry.

3. OPEN ENROLLMENT

Those who wish to join the Committee should contact Jamie Good or Jessica Gore.

4. ROLL CALL OF MEMBERS AND ADVISORS

A roll call of members and advisors was conducted.

5. OLD BUSINESS

5.1 Non-Structural Carbohydrates Expert Panel Update

After a discussion regarding non-structural carbohydrates in horse feed, the Board recommended that an AAFCO Industry Label Task Force be formed, as described on Page 132 of the OP.

Jamie Good is in charge of the task force and is gathering names. He has reached out to the American Feed Industry Association (AFIA) and would like another industry professional. Anyone interested in participating should contact him.

Once the names are gathered they will be submitted to the current AAFCO President for approval according to procedures outlined in the AAFCO OP.

5.2 Feed Through Pesticides Label Workgroup

ACTION – Jamie Good will send Steve Younker's contact information to Trish Dunn for label information.

Trish Dunn reported that a breakout session took place in the spring of 2025 regarding feed and pesticides. The Workgroup will meet in the fall of 2025. There may be a revised draft for the Committee to review soon.

5.3 Third-Party Audit Data Workgroup

Jessica Gore reported that an attempted meeting did not succeed, and the Workgroup will try again. Previously, the Workgroup discussed what third-party auditors look for during their audits and ways to gauge the industry's interest in sharing their audit results. If anyone is interested in joining the workgroup they should contact Jessica.

5.4 Required Guarantees for Formula Poultry Feeds

Charles Starkey reported that the group has met once to review the charge regarding required guarantees for formula poultry feeds. The base camp documents are being populated, and he is trying to add Brigid McCrea's presentation. There needs to be a delineation between commercial and backyard poultry. Anyone interested in joining should contact Charles Starkey or Jamie Good.

6. NEW BUSINESS

6.1 Criteria for Labeling Nutritional Indicators

6.1.1 Updates Process

The Board recommended that the criteria for labelling nutritional indicators be updated. This information can be found on Page 132 of the 2025 OP and includes guidelines regarding adding guarantees, when expert panels are needed, and how they should be formed.

Cathy Alinovi noted that currently, the model bill notes that task forces should include five experts from land-grant universities and five from regular industries. She noted that this may not be the most modern and efficient way to approach the topic.

6.1.2 Form Workgroup

ACTION – Jay Stapp will ask someone from the National Grain and Feed Association to join the workgroup.

Jamie Good proposed forming a workgroup to discuss the updates to the criteria for labelling nutritional indicators. Cathy Alinovi volunteered to join, as well as Stephanie Adams, on behalf of AFIA.

7. REMINDERS

7.1 Medicated Feed Labeling Workshop

Jamie Good noted that AAFCO is working toward adding a medicated feed labeling workshop to the 2026 annual meeting.

8. PARKING LOT ITEMS

8.1 Comprehensive Feed Labeling Guide Update

The comprehensive feed labeling guide was last revised at least five years ago and should be updated again. It is now 32 pages and should not be long, but additional information should be included, such as specific label examples. Jamie Good suggested forming a work group to update the document.

Kristi Smedley requested that multiple examples of feed ingredients be included, including enzymes, minerals, and microbials, and volunteered to join the workgroup.

Emily Helmes volunteered to join and suggested including the questions raised by Marissa Kost on August 4, 2025.

Dan Frank recommended that AFIA be included and volunteered to join, at least temporarily.

Bailey Whiten agreed to join, and Jamie Good agreed to lead the workgroup but is looking for volunteers who would like to lead. Anyone with ideas regarding the updates should email Jamie Good or Jessica Gore.

9. ADJOURNMENT

On a motion made by Bailey Whiten, seconded by Jamie Spencer, and carried, it was agreed that there was no further business to transact; the meeting closed at 10:00 a.m.

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Director	Director
Date	Date

ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS (AAFCO)
1800 SOUTH OAK STREET, SUITE 100
CHAMPAIGN, ILLINOIS

MINUTES OF THE CURRENT ISSUES AND OUTREACH COMMITTEE ANNUAL MEETING
HELD AT THE HILTON OMAHA
1001 CASS STREET
OMAHA, NEBRASKA
AUGUST 4, 2025, 1:00 P.M. CT

MEMBERS:

Jo Lynn Otero (Co Chair)	Kristen Green	Wendy Powell
	Katie Simpson	Bernadette Mundo
Bethany McAnulty (Co Chair)	Alan Keller	Nathan Moon
	Josh Arbaugh	

ADVISORS:

Bill Bookout	Chris Olinger	Emily Helmes
Betsy Flores	Katie Nass	
Berit Linnehan Foss	Louise Calderwood	

GUESTS:

Austin Therrell	Executive Director, AAFCO (via teleconference)
Tera Keatts	Partner, Philosophy Communication
Lori Goshert	Recording Secretary, Minutes Solutions Inc. (via teleconference)
Richard Ten Eyck	ODI/ AVA Lead

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 1:09 p.m.

2. WELCOME AND OPENING REMARKS

Jo Lynn Otero welcomed the attendees to the AAFCO Current Issues and Outreach Committee (CIOC) annual meeting.

3. WORKGROUP UPDATES

3.1 CIOC/Philosophy Workgroup Updates

Tera Keatts reported that media coverage in 2025 to date had totaled 30 articles and podcast interviews with an audience of 87 million and 371,000 readers. The Scientific Review of Ingredient Submissions (SRIS) pathway was launched, and a new program manager was hired. Subject matter experts are being recruited to participate in panels. She also shared a list of publications that had published relevant articles.

Tera Keatts shared statistics regarding social media, including a 17% increase in followers and 50,400 impressions on LinkedIn posts. Examples of social media posts include a new video that was filmed in San Antonio, content about the SRIS program, and a recap of the

2025 Advanced Inspector Training Seminar (AITS). The new digital subscription package has performed well.

3.2 Technical Assistance Network (TAN)

Austin Therrell reported that TAN was formalized in early 2025, and the process was running by the spring of the same year. The AAFCO TAN has received seven inquiries so far, two of which were not relevant. Austin Therrell apologized for the delay in response, noting that he has responded to half of the inquiries and the rest would be sent shortly. TAN is available on the AAFCO website, under "Resources" and under both "For Industry" and "For Regulators."

Industry professionals and regulators review the questions and the Board will need to discuss where to post the responses.

3.3 AAFCO Name Workgroup Updates

On a motion made by Kristen Green, seconded by Katie Simpson, it was resolved to accept the AAFCO Name Workgroup report. Motion carried.

On a motion made by Kristen Green, seconded by Josh Arbaugh it was resolved to disband the AAFCO Name Workgroup. Motion carried.

The AAFCO Name Workgroup was convened to investigate a change in the Association's name. The workgroup recommended that AAFCO not pursue a legal name change and that AAFCO instead increase outreach and communication efforts to emphasize pet food inclusion and international cooperation.

If an alternative name is desired in the future, the Association should consider establishing a "doing business as" (DBA), which would alleviate the hurdles associated with a legal name change.

4. INDUSTRY RELATIONS SUBCOMMITTEE

Louise Calderwood reported that the American Feed Industry Association (AFIA) continues to advocate for the Innovative FEED Act. The IFEEDER website, part of the charitable arm of AFIA, provides information regarding ingredients in livestock feed and pet food. Multiple consumption reports have been wrapped, and in September 2025, a report will be available on the vitamin and amino acid supply chain, which describes the impact on animal health and the domestic food supply if the supply of vitamins and amino acids were to become limited.

An AFIA 600 course, "Designing, Implementing and Documenting an Animal Food Safety Program," will be available online from September 16, 2025, to September 21, 2025. There will be a Preventive Controls Qualified Individual (PCQI) in-person refresher course on December 9, 2025, and December 10, 2025.

Bill Bookout reported that the American Pet Products Association (APPA) Global Pet Expo will be held on March 25, 2026.

Berit Foss reports that the National Grain and Feed Association (NGFA) will be hosting a Preventive Controls Qualified Individual (PCQI) course from August 26-28 in partnership with Kansas State University. Discussed an updated FSPCA (Food Safety Preventive Controls Alliance) curriculum for the PCQI training and a lead instructor PCQI training course component

Betsy Flores reported that the Pet Food Institute (PFI) has added a section to their website to educate consumers and veterinarians. There is a whitepaper on total dietary fiber and an

infographic poster intended for display in a veterinarian's office to educate pet owners about changes to pet food labels.

5. CONSUMER RELATIONS SUBCOMMITTEE

The CIOC is seeking members for the Consumer Relations Subcommittee. So far, one person has expressed interest. If interest is insufficient, the Subcommittee may be disbanded.

6. NEW BUSINESS

6.1 AVA (Closed-Source AI Regulatory Assistant)

Richard Ten Eyck presented an update on Ava, a closed-source artificial intelligence technical assistant being developed to support users of AAFCO's online resources. The project originated in February when Austin brought the AI technology from Swarm (a company connected through Clemson University) to the Online Database of Ingredients (ODI) Workgroup for evaluation. Following the workgroup's recommendation, the AAFCO Board approved the project in June 2025.

System Design and Content Ava operates as a closed-source system, meaning it only references documents specifically added to its secure library rather than accessing the broader internet. Currently loaded materials include the 2025 Official Publication, 21 CFR regulations, feed labeling guide, pet food labeling guide, common food index, and ODI data covering approximately 4,000 ingredients. An additional 60 documents are planned for inclusion, with future additions to encompass FDA guidance documents, state feed regulations, and potentially international regulations.

Implementation Timeline The system is currently in beta testing phase with a diverse group of testers including ODI workgroup members, industry representatives, and label review firms. The rollout plan includes:

- Fall 2025: Expansion to investigators, committee members, and advisors
- January 2026: Full access for the entire Association, coinciding with the 2026 Official Publication release

Functionality and User Experience Ava will be integrated directly into the feed bin digital package, requiring no separate logins. Users can interact through both voice and text input. Ten Eyck demonstrated the system's ability to provide detailed answers by pulling information from the loaded documents, such as explaining differences between meat meal and meat and bone meal, and providing FDA registration guidance.

Quality Controls and Limitations Each response includes a disclaimer advising users to "always consult the official source material directly before making any decisions." This reflects the sophisticated nature of feed regulations where precise wording is critical. Ten Eyck emphasized that specific questions yield better answers and noted that while Ava should provide 80% accuracy and proper direction, it may not capture every nuance.

Future Enhancements Long-term goals include the ability to upload PDF labels for automated review to identify missing components, integration with international regulations, and potential marriage with the ODI system for comprehensive regulatory guidance.

Management Structure Ten Eyck indicated that long-term management will likely involve a small steering committee of 3-4 people to oversee document additions and system guidance, with members not necessarily required to be regulators.

The presentation concluded with promotion of the ODI system and an invitation for attendees to test Ava in the networking area, with plans for broader social media promotion accompanying the January 2026 launch.

6.2 AAFCO Certified Retailer Program

Austin Therrell proposed creating a certified retailer program, which would feature an online course that retailers can take on topics such as how animal feed is regulated, where to find one's state feed control official, how to handle recalls, and how firms develop food safety plans. A certification or accreditation may be offered for passing the course. He noted that the course would not discuss quality, types of produce, or nutrition; the topic would be food safety only.

A number of attendees offered to assist with this project, including Bill Bookout, Katie Simpson, Louise Calderwood, and Bethany McAnulty. Austin Therrell offered to lead it.

An issue was raised regarding the certification and its duration, as the person who took the course may leave the retail establishment.

7. ADJOURNMENT

It was agreed that there was no further business to transact; the meeting closed at 1:48 p.m.

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ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS (AAFCO)
1800 SOUTH OAK STREET, SUITE 100
CHAMPAIGN, ILLINOIS

MINUTES OF THE ENFORCEMENT ISSUES COMMITTEE (EIC) MEETING
HELD AT THE STATEHOUSE CONVENTION CENTER
101 EAST MARKHAM STREET
LITTLE ROCK, ARKANSAS
AUGUST 5, 2025, 3:15 P.M. CT

MEMBERS: 21 (11 for quorum)

Present (15)	Absent (6)
Blake Pickett (AL, Co-Chair)	Robert Tolton (AZ)
Shannon Campbell (MN, Co-Chair)	Stan Cook (LM)
Ernie Berkeley (SC, Vice-Chair)	Rick Manthei (MN)
Bailey Whiten (GA, board liaison)	Ben Jones (TX)
Jo Lynn Otero (NM)	Sherrie Krolznyk (FDA)
Laura Scott (Canada)	Courtney Foote (LA)
Maghan Lage (MO)	
Shaness Thomas (FL)	
Scott Ziehr (CO)	
Ashlee-Rose Ferguson (WA)	
Dan King (MN)	
Ely Walker (KS)	
Josh Arbaugh (WV)	
Isaac Carney (FDA)	
Timothy Tyson (FDA)	

SPEAKERS DURING MEETING:

Bill Bookout, President, National Animal Supplement Council (NASC)
Wendy Powell (MI)
Holly Jewel (SC)
Jenny Combs (KY)
Kristen Green (KY)

Board Action Items: None

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 3:25 p.m.

2. NATIONAL ANIMAL SUPPLEMENT COUNCIL FUNCTIONAL TREAT PROGRAM GUEST SPEAKER

Bill Bookout presented on the NASC's new pet treat program. The NASC will expand their scope to address pet treat products some companies have recently been selling. These companies are creating food products and labelling the products as health supplements. More specifically, these are functional products in larger delivery formats. For example, an emerging area is functional chewables with larger delivery formats. These larger delivery formats facilitate palatability and animal acceptance. <These products are functional products with no

nutritional benefits.> However, the presentation also discussed products that may be either unapproved products as functional treats or approved ingredients used for unapproved purposes. As an example, many of Gruffies' dog treat products have unapproved ingredients and are adulterated and mostly misbranded food. Bill Bookout asked for the Committee to enforce Gruffies due to remedy and drug claims.

Bill Bookout presented a draft letter outlining that the intended use of the product is more important than the size. See attachment below. – "Size doesn't matter"

Wendy Powell mentioned since treats are still a food product, they should still follow PFLM and nutritional water additives are considered food. Bill Bookout confirmed that anything that mixes with a food or water for nutritional values is considered a food.

The NASC has conducted regulatory trainings several times. Bill Bookout noted that it would be beneficial for the Committee to provide training and enforcement to curb the problem. Katie Simpson also encouraged all regulators to attend NASC conference as attendees are thankful for regulators' presence.

The NASC will announce their extension to treats by the end of August. Regulators are encouraged to attend the NASC's conference.

3. FDA HPAI AND NEW WORLD SCREWWORM UPDATE

Isaac Carney provided an update on the FDA's progress on researching microbial resistance to the New World screwworm. The FDA anticipates the screwworm will enter into the U.S. eventually. Do not expect it to spread to far geographically due to weather patterns. The FDA is researching several options and is constantly monitoring the situation. The FDA is concerned that the screwworm could potentially enter into animal feed. FDA is researching how to prepare for adulterations. It was noted that the screwworm eats living tissue, and not grains.

The FDA is testing several methods to learn more about HPAI, including testing on cats and dogs. They were also creating a plan involving samples but could not proceed due to laboratory space challenges that prevented isolation of virus. However, they still were able to issue a class 1 recall under A-3 charges, unfit for animal food, without virus isolation. Regarding if a state has a positive PCR requiring the need to send samples to NVSL for confirmation, Isaac Carney confirmed that the FDA cannot guarantee laboratory space but can potentially leverage their laboratory network. Asking for "for cause" sampling only. Ashlee-Rose asked about the FDA partnership with the USDA. It was noted that the FDA is partnering with the USDA due to dual jurisdiction by performing traceback as far as they are allowed and passes along the information they discover to liaisons within governing agencies. FDA expects cases to ramp up this fall and encourages early contact with FDA and Public Health. Most problems with HPAI from animal feed are found from instances of protein ingredients, eggs and meat, being mixed in homes

Shannon Jordre has sent FDA website links of drugs available for the screwworm and other information. The websites will gain more information as more research is performed. The EPA also has approved pesticides for the screwworm. Typically, doctors do not use medication to address screwworm in humans; instead, the infested wound is treated with a powder or cream. If a surgical procedure is necessary, doctors cut out the tissue with the screwworms.

https://www.fda.gov/animal-veterinary/safety-health/animal-drugs-new-world-screwworm

https://www.fda.gov/news-events/press-announcements/hhs-allows-fda-emergency-use-animal-drugs-comba…

4. CHAPTER 5 OP EDITS

No additional edits were made to Chapter 5. The work group will be suspended.

5. NETWORK OF LABORATORIES TO PERFORM ANALYTICAL WORK ACROSS STATES

Josh Arbaugh gave an updated on the LMSC work group created to survey the laboratory capabilities and create a laboratory network. The group will survey laboratory directors asking their willingness to accept samples from outside states and methodology and other details. The survey will be sent out in the fall, 2025 to states and Canada.

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6. CGMP/507 VIOLATIONS FOR ADULTERATION AND STOP SALE

The Committee held a discussion regarding regulatory action when inspectors find a violation that is not provable by test or is only a visual but is still can be defined as a 507 violation. The discussion was mainly state inspections but could include FDA contract inspections. It was advised that states review their laws to determine if they can use 507 violations as some states may need to adopt the 21 CFR 507 CGMP language due to the differences in laws on a state-by-state basis.

Isaac Carney from FDA confirmed that using § 402 (a)(4) for adulteration from 507 violations involve an inspection observing systemic breakdowns that could lead to adulteration. These observations are usually not isolated incidents. Should document all observations to paint picture of egregiousness that depicts a high probability of adulteration within the facility to be able to issue a 483.

A discussion on an informal letter could also be used to warns firms of the possible 507 violation an inspector foresees and how the situation could escalate. States could start with a warning letter and then threaten and enforce a stop sale when needed, with enforcement coming from a state inspection

Isaac Carney confirmed that states should not issue a stop sale without the FDA's approval on FDA contract inspections. He welcomed organizations to consult them about the action they want to pursue and invited inspectors and organizations to email his organization's program, RTAN, at any time if they need assistance with a violation situation.

Wendy Powell of Michigan indicated that they have used the process as described by Isaac. They would have discussions with FDA early and use AFRPS enforcement standards in their decision process. A review of previous inspections reports can escalate an observation to be moved directly to an enforcement action.

Another discussion was in reference to creating a resource for regulatory authorities to share warning letter templates to aid new and existing animal feed programs. This information was to be collected via list serve after the meeting.

7. CHALLENGES OF PFLM IMPLEMENTATION PROCESS

Blake Pickett allowed for open discussion on the current challenges anyone is having on PFLM implementation. Ashlee-Rose Ferguson mentioned that her state's PFLM became active last

month. She invited other states to analyze their PFLM's language and modify it for their own PFLMs.

8. ENFORCEMENT OF ONLINE SALES

As more online retailers are popping up and owners are buying more animal feed and pet food products through websites and social media, we have noticed and felt the struggles of enforcing regulation for products sold online. The Committee would like to create a toolkit and a list of contacts for regulators to enforce online sales of large companies such as Amazon and Chewy. There are two types of online sales: direct to consumers, and sales through distributors. The first step is to create a report system for regulators to use if they see unregistered or mislabeled products and non-licensed manufactures.

Another option is for AAFCO to send a letter to companies reminding them of their responsibility to regulate themselves; currently, large companies typically place responsibility onto the manufacturers. Holly Jewel, with the Pet Food Committee is working with Amazon to create education materials, and it was noted that Amazon has lower standards of pet food than the PFC.

Scott Ziehr confirmed that Colorado cannot regulate a product that is not sold in their state. It was noted that firms will share information of products that are sold in any state.

COMMITTEE ACTION – The Committee will create a contact list of large online retail companies to address products offered for sale not in compliance on their online website and system for regulators to unregistered or mislabeled products and non-licensed manufactures. Via mini list serve

9. NATIONAL ANIMAL SUPPLEMENT COUNCIL FUNCTIONAL TREAT PROGRAM DISCUSSION

There was a brief discussion on the company mentioned during the NASC discussion at the beginning of the meeting. FDA discussed that they would act on any complaints adulterated or misbranded products and that they informed NASC of the appropriate channels. All states would handle individually and would not issue a joint letter.

10. ATTACHMENTS

NASC DRAFT LETTER

11. ADJOURNMENT

On a motion made by Bailey Whiten, and seconded by Josh Arbaugh, and unanimously carried, it was resolved to close the meeting at 5:09 p.m.

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Director	Director

Date

Date

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July 10, 2025

Mr. Austin Therrell
Executive Director AAFCO
AAFCO Headquarters Office
1800 S. Oak Street
Suite 100
Champaign, IL 61820-6974

Re: Animal Health Supplement Dosage Forms

Dear Austin:

We represent the National Animal Supplement Council ("NASC"), the leading trade association for Dosage Form Animal Health products, commonly referred to as Animal Health Supplements ("AHS"). NASC's mission is to promote the health and well-being of companion animals and horses that are given animal health supplements by their owners, and to protect and enhance the animal health supplement industry. The Council and its members work cooperatively with state, federal, and international government officials to create a legislative and regulatory environment that is fair, reasonable, responsible, and nationally consistent. Such an environment of safety, accuracy, and quality serves the interests of NASC members by ensuring ethical manufacturing and labeling practices are upheld throughout the industry. Importantly, NASC has worked closely with the FDA, as well as with individual member states of AAFCO, to develop a co-regulatory program that allows both members and non-members to market AHS in a manner appropriate for their regulatory category as low-priority animal drugs.

With that said, it has come to our attention that there is a misconception among AAFCO member states that AHS products are limited in dosage form and size. It appears there is a misunderstanding that "form and size," rather than "intended use," controls whether a particular product is classified as a pet food/treat or as an AHS. This is a fundamental misunderstanding of controlling law, as the "intended use" of a product governs whether it is regulated as an AHS versus traditional pet food. This regulatory principle has significant legal and practical consequences that affect manufacturers, veterinarians, and pet owners across the United States.

The "intended use" doctrine is the cornerstone of the FDA's regulatory classification system for animal products. Under the Federal Food, Drug, and Cosmetic Act (FD&C Act), the FDA defines "intended use" as "the objective intent of the persons legally responsible for the

labeling" of a product.[1] This determination is not based on a marketer's subjective claims, but rather on objective evidence that demonstrates how the product is actually intended to be used.

Importantly, the FD&C Act defines a "drug" to include "articles intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease," or those "intended to affect the structure or any function of the body" beyond what food normally provides. Conversely, the courts have interpreted "food" to mean products consumed mainly for nutrition, taste, or aroma. When products make claims beyond these traditional food purposes, they cross into drug territory regardless of their physical form. This creates a binary classification system in which animal products are considered either "foods" or "new animal drugs" based on their intended use, with no intermediate "dietary supplement" category. Unlike human dietary supplements, which benefit from the Dietary Supplement Health and Education Act (DSHEA) of 1994, no equivalent regulatory framework exists for animal products. To be clear, the FDA has stated:

> Under the FD&C Act, expressed or implied claims that establish the intended use of the product to cure, treat, prevent, or mitigate disease, or affect the structure or function of the body in a manner other than food (nutrition, aroma, or taste) can identify an intent to offer the product as a "new animal drug."[2]

The FDA employs a comprehensive "totality of the evidence" approach when determining intended use, considering any relevant source of evidence rather than relying solely on promotional claims. The most direct evidence includes product labels, promotional materials, advertising, and any explicit or implicit claims about the product's purpose. This encompasses both written statements and visual representations that suggest therapeutic benefits. The presence of functional ingredients that provide health benefits beyond basic nutrition can support classification as an animal health supplement. These include ingredients like polyphenols, antioxidants, non-essential nutrients, or botanical extracts such as turmeric or ashwagandha, all intended to provide non-nutritive specific health benefits to the targeted species. Additionally, products intended to provide supplemental therapeutic benefits, rather than replace typical food consumption, are further evidence of intended use as an AHS.

To illustrate the FDA's application of intended use, consider the example of an AHS the size of a dog biscuit. The biscuit-like product contains non-nutritive antioxidants, turmeric, Boswellia serrata, and MSM to support joint health and comfort. The statement of identity for the product is "Animal Health Supplement," with the following directions for use: "One chewable daily." While the large format product contains calories, fat, and protein, its intended use is not as a treat or a complete food, but to support joint health. Under the FDA's intended use doctrine and

[1] See 8 21 C.F.R. §§ 208.128 and 801.4.
[2] https://www.fda.gov/animal-veterinary/animal-food-feeds/product-regulation.

the totality of evidence, the purpose of this product is as an animal drug, not as animal food. Accordingly, the FDA would consider it an unapproved new animal drug because its intended purpose is not based on its nutritive value but on its non-nutritive value. To state it differently, the critical regulatory question is whether the product is "intended for use" beyond traditional food purposes. If a large-format dog product is primarily marketed and intended for non-nutritive structure/function benefits rather than taste, aroma, or basic nutrition, it is classified as an unapproved new animal drug and, thus, is an animal health supplement. This example demonstrates why physical characteristics are irrelevant to regulatory classification. Two identical products that look like dog biscuits could be classified differently based solely on their intended use, as evidenced by marketing claims, labeling, and promotional materials. One marketed as a tasty treat would remain a food, while another marketed for joint health or immune support would become an animal health supplement subject to enforcement discretion if claims are limited to otherwise permissible structure/function claims. The form and palatability of the product simply provide a straightforward, safe method of delivering the AHS for both the pet and the pet parent.

In summary, the regulatory distinction between animal health supplements and traditional pet foods hinges on the product's intended use rather than its physical form or size. The FDA's "intended use" doctrine, grounded in the FD&C Act, establishes that products making claims beyond basic nutrition, taste, or aroma are classified as animal drugs, regardless of their appearance. This principle, supported by a "totality of the evidence" approach, ensures that regulatory oversight is based on objective evidence such as labeling, marketing, and ingredient functionality. Misconceptions among regulatory bodies that focus on form and size rather than intended use risk misclassifying products and undermining both industry standards and consumer safety. The NASC advocates for a consistent, fair regulatory environment that recognizes intended use as the controlling factor, thereby supporting ethical practices and the well-being of companion animals, horses, and their owners.

Best regards,

Todd A. Harrison, Esq.
Counsel to NASC

Cc: Bill Bookout, Executive Director, NASC

Education & Training Committee Report

2025 AAFCO Annual Meeting
Wednesday, August 6, 2025, 8:00 AM (CT), Omaha, NE

Committee Recommendations

ETC recommends approval of the updated AAFCO Model Training Documents from the BOD and to make them available to all AAFCO members.

Board Recommendations

None.

Committee Participants

Members Present: Daniel Zangari (Chair) – CO, Marissa Kost (Vice-Chair) – NC, Blaine Brown – IN, *Vanessa Capiz – AZ, Holly Jewell – SC, Tiffany Leschishin – MN, Samantha Moran-Defty – CA, Jo Lynn Otero – NM, Jim True – KY, *Pablo Viramontes – NM, Tim Weigner – Life Member
Advisors Present: Bill Bookout – APPA & NASC, Dr. Berit Foss – NGFA, Pat Tovey – PFI, Amy Tryon – PFI
Virtual Attendees: Bethany McAnulty – TN, Kate Nelson – CT, Taliaa Pendergrass – MO, Shaness Thomas – FL
Others Present or Virtual: Adam Betman – FDA (virtual), Jenny Combs – KY, Jessica Gore – NC, Leah Wilkinson – AFIA, Landon Kidd – UT, Amanda Anderson (virtual) – AFIA
New members for this meeting.

Committee Report

Committee Activities

ACTION: To forward the revised AAFCO Model Training documents to the Board of Directors for consideration and approval.
MOTION: "I move to send up to the Board of Directors" Samantha Moran-Defty, CA/Second: Jim True, KY –- passes

Subcommittee Activities

None.

Committee Minutes

Dan Zangari, Chair, having a quorum, called the meeting to order at 8:05 AM (CT). Introductions were made, and attendance was taken. Agenda item modifications and removals were mentioned.

Training Availability Updates

- FDA OTED Training Update
  - Dan Zangari, CO, reported that the FDA training OTED program will be updated by August 29, 2025, and finalized by the end of December 2025. Plans call for transitioning to a new website address for OTED.
- AAFCO Basic Inspector Training Seminar (BITS) Update – Blaine Brown, IN
  - BITS 2025 – September 22-26, 2025 (Harrisburg, PA)
    - The 2025 BITS will take place from September 22-26, 2025, in the Harrisburg area of Pennsylvania, with the specific location to be determined later.
  - Future BITS locations have not been determined. Blaine Brown, IN, recommended reaching out to him with a need or a desire to be a host state.
- AAFCO Advanced Inspector Training Seminar (AITS) Update – Jessica Gore, NC
  - AITS 2025 – June 2-6, 2025 (Savannah, GA)
    - AITS 2025 took place June 2-6, 2025, at the Bryce Hotel in Savannah, Georgia. Jessica Gore noted that this year's seminar included environmental monitoring training and suggested offering the same option again in the future. The seminar attracted 36 attendees from nine states. South Carolina plans to host the next seminar during the first two weeks of June 2026. The exact date and location will be announced later.

Sub-Committee Updates

- Feed Administrators Seminar Sub-Committee – Jenny Combs, KY
  - FAS 2025 – May 5-9, 2025, Cliffview Resort, Campton, KY

- Jenny Combs, KY, reported that the seminar was a success. Topics covered included inspections and program management. Connecticut will host the next seminar in May 2026 and 2027, with a specific location to be determined and announced later.

Workshop Calendar Request Updates

- Annual 2025 (Omaha, NE) – Pet & Specialty Pet Food Labeling Workshop Update – Tiffany Leschishin - MN
  - AAFCO & NASC Pet and Specialty Pet Food Labeling Workshop will be held at the AAFCO Annual 2025 meeting in Omaha, Nebraska, on August 6 (1-6pm) and 7 (8am-4pm), 2025 (1.5 days post-meeting).
  - Tiffany Leschishin, MN, reported that all goals of the recent Pet Food Labeling Workshop were met with 75 attendees.

Workgroup Updates

- AAFCO Model Training Documents – Samantha Moran-Defty, CA (WG Lead)
  - Members: Jessica Gore, Bethany McAnulty, Kevin Klommhaus, Marissa Kost, Kimberly Hull, Shaness Thomas, Tim Weigner, Dan Zangari, Jim True, Samantha Moran-Defty, Debra Brasel
  - The AAFCO Model Training Document Work Group completed their review of the training document. On a motion made by Samantha Moran-Defty, CA, and seconded by Jim True, KY, it was resolved to forward the AAFCO model training documents to the Board of Directors for consideration. Motion carried.
  - The documents will be available on the website after approval by the Board.

New Business

- IFSS RLTS Status Update:
  - Adam Betman of the FDA described the collaborative training opportunities available through FDA's IFSS aimed at ensuring a safe and secure food system. Recently introduced under IFSS and now being rolled out is the Regulatory and Laboratory Training System (RLTS). RLTS is designed to provide training opportunities on an on-demand and nationwide basis. Currently, RLTS is undergoing testing to determine how it can be coordinated with other FDA systems. A full launch is expected in the coming months. Alongside RLTS efforts, the FDA will continue working within the OTED framework. Adam Betman reported that RLTS has a communications component to keep partners informed and promote transparency. It also includes a market analysis system. The goal of RLTS is to deliver consistent and standardized training. The training records are meant to follow professionals throughout their careers. Trainers, including training companies, will receive competency and quality scores within the RLTS.
- Continuing Education & Scholarships Workgroup:
  - Marissa Kost, NC, invited attendees to suggest content training ideas that AAFCO could offer after AITS and BITS. One attendee recommended feed mill inspection training. The Committee discussed sending out a survey to gauge interest in new training and gather feedback on how the training is being delivered. It was suggested to include information in training documents that explains "why" each issue is important.
  - Members of the Continuing Education Work Group were recognized. The need for more members and a leader was highlighted. The goal is to hold the group's first meeting in September 2025.

Adjourn 9:04 AM (CT).

Action Items

Responsible	Item	Action	Timing / Status
WG: Samantha Moran-Defty (lead), Debra Brasel Jessica Gore, Kimberly Hull, Kevin Klommhaus, Marissa Kost, Bethany McAnulty, Shaness Thomas, Jim True, Tim Weigner, Dan Zangari	AAFCO Model Training Documents	Complete review of current Model OJT Manual/Documents. Send to ETC for committee vote. Send to BOD for AAFCO membership vote.	Voted to send to BOD. **COMPLETE**
WG(s): Dan Zangari, Tim Weigner, Jim True, Marissa Kost, Ashlee-Rose Ferguson*, Kate Nelson, Taliaa Pendergrass, Tory Woods, Julie Berry*, Kevin Klommhaus, Wendy Powell*, Holly Jewell, Berit Foss, Ryan Morgan* *Non-ETC member	Continuing Education & Scholarships	Choose a lead and begin discussions regarding charge(s) from the work group(s). 1. Implement something to follow BITS and AITS as regular AAFCO business. 2. Refer development of AAFCO course on feed regulation & inspection for formal ag institutions to use in their curriculum to Board for consideration.	Midyear 2026 – update on WG(s) progress
WG: Kimberly Hull (lead), Marissa Kost, Kevin Klommhaus, Jennifer Godwin, ~~Jacob Fleig~~	Course Curriculum Update	WG needs to reconvene to update ComplianceWire links for AAFCO document (Job Aid-AFRPS). Also consider adding column to assist with defining curriculum for type of inspection (AFRPS 2.3.1.1.1 & 2.3.1.1.2).	Midyear 2026
WG: Marissa Kost, ~~George Ferguson~~, Jo Lynn Otero, Jim True, ~~Jacob Fleig~~, Danielle Borchert	Leadership Training	1. UPDATE: Paused pending outcome of IFSS/RLTS outcome. 2. ON HOLD 3. ON HOLD 4. ON HOLD 5. ON HOLD	**ON HOLD – 2026** (launch expected)
WG: Nathan Price, Kate Nelson, ~~Eric Brady, Scott Absher~~, Marissa Kost, Kevin Klommhaus	Training Endorsement Policy	Send updated SOP (additional guidance document) to commitee for e-vote. No changes to OP Table 5 or Training Endorsement Policy.	December 2025 – eVote
WG: TBD	RLTS Course Evaluations	Score OTED courses applicable for feed inspections (VM courses and courses required for contract inspections), BITS and AITS for alignment with the RLTS curriculum standards. After self-assessment, submit the score sheets for verification. Q-Score sheet available; C-Score sheet being developed.	TBD
WG: N/A - DISBANDED	Laboratory Survey	Consulted with LMSC who are already doing survey work and will integrate animal food regulators. The form to identify training needs for LMSC is complete and on website. The surveys are created and on a set schedule to be sent out to both regulators and labs. Expect it to be ready Spring 2024 and distributed by Annual 2024.	**COMPLETE**

IDC Committee Report
2025 Omaha, NE
8/4/2025
2:15 Central Time

Committee Recommendations:

- 57.170 Zinc-L-Selenomethionine Complex [(2*S*)-2-amino-4-(methylseleno)butanoate zinc chloride] OFFICIAL

  Zinc-L-Selenomethionine Complex [(2*S*)-2-amino-4-(methylseleno)butanoate zinc chloride], is manufactured by the reaction of a soluble zinc salt with chemically synthesized L-selenomethionine at an appropriate stoichiometric ratio. The additive is produced in liquid form and consists of not less than 19 percent (weight/weight) of L-selenomethionine.
  (a) The zinc-L-selenomethionine complex meets the following specifications:
  (1) Arsenic, not more than 0.5 parts per million (ppm);
  (2) Cadmium, not more than 1 ppm;
  (3) Lead, not more than 1 ppm; and
  (4) Mercury, not more than 0.1 ppm.
  (b) Selenium, as zinc-L-selenomethionine complex, is added to complete feed for broiler chickens at a level not to exceed 0.3 ppm.
  (c) The additive, as zinc L-selenomethionine complex, shall be incorporated into each ton of complete feed by adding no less than 1 pound of a premix containing no more than 272.4 milligrams of added selenium per pound.
  (d) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling of zinc-L-selenomethionine complex in its packaged form shall contain:
  (1) The name of the additive, zinc-L-selenomethionine complex;
  (2) Minimum and maximum guarantees for total selenium;
  (3) Minimum guarantee for selenomethionine content;
  (4) The following statement, “Storage Conditions: zinc-L-selenomethionine complex must be stored in a closed package at temperature not higher than 25 °C (77 °F).”; and
  (5) An expiration date not to exceed 6 months from the date of manufacture.
  (e) The premix manufacturer shall follow good manufacturing practices in the production of selenium premixes. Inventory, production, and distribution records must provide a complete and accurate history of product production. Production controls must assure products to be what they are purported and labeled. Production controls shall include analysis sufficient to adequately monitor quality.
  (f) The label or labeling of any selenium premix shall bear adequate directions and cautions for use including this statement: “Caution: Follow label directions. The addition to feed of higher levels of this premix containing selenium is not permitted.
  21 CFR 573.920

- New AGRN 72, for Table 101.1 OFFICIAL

AGRN	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
72	Protekta, Inc.	Synthetic sodium aluminosilicate	Synthetic sodium aluminosilicate	To be used to maintain calcium balance in peri parturient dairy cows fed at a level of 400 grams synthetic sodium aluminosilicate/head/day for up to 14 days	Dairy cattle	8/19/2024	FDA has no questions. (PDF - 3 pages)

- 51.19 Fish to OFFICIAL (modified definition by adding, and skin)

51.19 Fish is undecomposed whole fish or flesh derived from the skeletal muscle, with or without accompanying bone and skin, exclusive of any added heads, fins, tails, skin, bones and viscera, except in such amounts as might occur unavoidably in processing. It shall be suitable for use in animal food. It is intended for use in animal food as a source of protein consistent with good feeding practices. If it bears a name descriptive of its kind, it must correspond thereto.

*Note to editors: This will replace the current T51.19 and it will be a new Official definition under the new By-laws change that removed the required tentative status.

- 87.9 Ammoniated Cottonseed Meal REMOVE DUPLICATE

87.9 in Special Purpose Products, is a duplicate definition of 24.14 Ammoniated Cottonseed Meal in Section 24, Cottonseed Products. Remove 87.9 and the reference to 87.9 in the index of the OP. Change the note in section 66, Non-Protein Nitrogen, to reference definition 24.14.

Editorial (Does not need board vote, but requires FASS action)

Common Food Index – Add (Include on AAFCO CFI webpage and the ODI)

- Dates
- Pumpkin Seed
- Honeydew
- Cantaloupe
- Spinach

(*Note- Spinach was previously recommended but was not included in the CFI)

New Workgroups: Set up WG in Basecamp

1. Enzyme Marketing Coordination Document- Review and update as needed.
   a. Emily Helmes, Richard TenEyck, Jordyn Johnston, AFIA representative
2. CFI- Review procedures and make edits to items on the current list.

a. CFI subcommittee, others?

Board Recommendations:

Committee Minutes: including motions.
See Attachment A, Minutes
Attachment B, CFI Recommendations and Notes

ATTACHMENT A

MINUTES OF THE INGREDIENT DEFINITIONS COMMITTEE ANNUAL MEETING
OMAHA, NEBRASKA
AUGUST 4, 2025, 2:15 P.M. CT

MEMBERS:

David Snell, Co-Chair
Erin Bubb, Chair (virtual)
Alan Keller
Ali Kashani
Ashlee-Rose Ferguson
Ashley Shaw
Bailey Whiten
Bernadette Mundo
Brittany Clark
Charlotte Conway
Cory Skier
Dan King
Ely Walker
Falina Hutchinson
James Embry
Jo Lynn Otero
Jordyn Johnston
Justin Hill
Katie Simpson
KC Gutenberger
Kimberly Truett
Laura Scott
Marissa Kost
Mark LeBlanc
Nathan Price (virtual)
Tom Phillips (virtual)
Trish Dunn

ADVISORS:

Amy Tryon DaPrato
Bill Bookout
Cathy Alinovi
Charles Starkey
Dave Ailor
Emily Helmes
Hunter Buffington
Joe Ward
Kristi Smedley
Leah Wilkinson
Leann Meyer
Patrick Fulling
Renee Streeter
Sarah Hubert

GUESTS:

Dr. Haley Larson	SRSI Director, Kansas State University-Olathe
Dr. Garret Ashabranner	SRSI Program Manager, Kansas State University-Olathe
Richard Ten Eyck	ODI Coordinator
Eric Johnson	Recording Secretary, Minutes Solutions (via teleconference)

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 2:21 p.m.

WELCOME AND OPENING REMARKS

Co-Chair David Snell welcomed the attendees to the meeting.

APPROVAL OF AGENDA

No discussion of the agenda was made.

(New Definition) 57.170 Zinc-L-Selenomethionine Complex [2*S*)-2-amino-4-(methylseleno)butanoate zinc chloride], is manufactured by the reaction of a soluble zinc salt with chemically synthesized L-selenomethionine at an appropriate stoichiometric ratio. The additive is produced in liquid form and consists of not less than 19 percent (weight/weight) of L-selenomethionine.

(a) The zinc-L-selenomethionine complex meets the following specifications:

(1) Arsenic, not more than 0.5 parts per million (ppm);

(2) Cadmium, not more than 1 ppm;

(3) Lead, not more than 1 ppm; and

(4) Mercury, not more than 0.1 ppm.

(b) Selenium, as zinc-L-selenomethionine complex, is added to complete feed for broiler chickens at a level not to exceed 0.3 ppm.

(c) The additive, as zinc L-selenomethionine complex, shall be incorporated into each ton of complete feed by adding no less than 1 pound of a premix containing no more than 272.4 milligrams of added selenium per pound.

(d) To assure safe use of the additive, in addition to the other information required by the Federal Food, Drug, and Cosmetic Act, the label and labeling of zinc-L-selenomethionine complex in its packaged form shall contain:

(1) The name of the additive, zinc-L-selenomethionine complex;

(2) Minimum and maximum guarantees for total selenium;

(3) Minimum guarantee for selenomethionine content;

(4) The following statement, “Storage Conditions: zinc-L-selenomethionine complex must be stored in a closed package at temperature not higher than 25 °C (77 °F).”; and

(5) An expiration date not to exceed 6 months from the date of manufacture.

(e) The premix manufacturer shall follow good manufacturing practices in the production of selenium premixes. Inventory, production, and distribution records must provide a complete and accurate history of product production. Production controls must assure products to be what they are purported and labeled. Production controls shall include analysis sufficient to adequately monitor quality.

(f) The label or labeling of any selenium premix shall bear adequate directions and cautions for use including this statement: “Caution: Follow label directions. The addition to feed of higher levels of this premix containing selenium is not permitted.

22 CFR 573.920 (Proposed xxxx, Adopted xxxx)

On a motion made by Laura Scott, seconded by James Embry, it was resolved to accept the definition 57.170 Zinc-L-Selenomethionine Complex [(2S)-2-amino-4-(methylseleno) butanoate zinc chloride]. Motion carried.

5. **New AGRN 72**, for Table 101.1

AGRN	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
72	Protekta, Inc.	Synthetic sodium aluminosilicate	Synthetic sodium aluminosilicate	To be used to maintain calcium balance in peri parturient dairy cows fed at a level of 400 grams synthetic sodium aluminosilicate/head/day for up to 14 days	Dairy cattle	8/19/2024	FDA has no questions. (PDF - 3 pages)

On a motion made by Nathan Price, seconded by Brittany Clark, it was resolved to add AGRN 72 to table 101.1. Motion carried.

6. (**New Official**) 51.19 Fish is undecomposed whole fish or flesh derived from the skeletal muscle, with or without accompanying bone and skin, exclusive of any added heads, fins, tails, skin, bones and viscera, except in such amounts as might occur unavoidably in processing. It shall be suitable for use in animal food. It is intended for use in animal food as a source of protein consistent with good feeding practices. If it bears a name descriptive of its kind, it must correspond thereto.

On a motion made by Justin Hill, seconded by Katie Simpson, it was resolved to amend the definition T51.19 Fish by adding "and skin" after amending the identifier "T51.19" by removing the "T" (tentative status). Motion carried.

The Committee discussed whether the wording might be confusing to some readers as "skin" is mentioned twice in the definition. It was noted this was added to ensure it was understood that accompanying bone and skin from the fish is acceptable. Added skin is outside the definition.

*Note: This will replace the current T51.19 and it will be a new Official definition under the new By-laws change that removed the required tentative status.

Feed Terms: Pasteurized or High-Pressure Pasteurization, Jerky, and Gently Cooked

It was reported that work on the high-pressure pasteurization definition is ongoing. Jerky and Gently Cooked are also being discussed. Industry is invited to provide input and should reach out to the feed term investigator, Ali Kashani, if they want to participate. Ample room for discussion will be provided before the committee votes on any definitions.

Common Food Index (CFI)

On a motion made by Jordyn Johnston, seconded by Laura Scott, it was resolved to accept the CFI subcommittee report. Motion carried.

George Ferguson of the CFI subcommittee discussed efforts involved in adding items to the CFI.

Proposed New Items for Inclusion in the CFI

On a motion made by Katie Simpson and seconded by Jordyn Johnston it was resolved to accept dates, pumpkin seeds, honeydew, and cantaloupe into the CFI. Motion carried.

Work Group

On a motion made by Laura Scott, seconded by Falina Hutchinson, it was resolved to create a work group with CFI subcommittee members, government regulators, and industry representatives to review procedures and make recommended edits to items currently on the CFI list. Motion carried.
Committee members noted that voting for new ingredients is done only during in-person Committee meetings. David Snell said anyone who would like to serve on the new work group is welcome to step forward.

CFI - Spinach

On a motion made by Jordyn Johnston, seconded by Bailey Whiten, it was resolved to accept spinach into the CFI. Motion carried.

The subcommittee noted that spinach was originally considered by the Committee for the CFI based on a 2023 submission, review, and public comment period. Due to an editorial error, spinach was not included on the Committee's list for a CFI vote at that time.

The Committee noted that Kent Kitade is retiring from the CFI subcommittee and is being replaced by Ken Bowers, Life Member.

Workgroup Updates

Animal Protein Work Group

Charles Starkey noted that a discussion for delineating meat meal and bone meal, as well as a discussion on broth and collagen, are ongoing. The animal protein work group will be meeting later that day.

DFM Nomenclature Work Group

Marissa Kost recently became lead of the work group and reported it could use more members and discussed clarification on the work groups charge.

old business

Statements for Uniform Interpretation and Policy

Dan King reported an update for SUIP 9 was going before MBRC.

Feed Terms

No information was presented on ashed, air-ashed, pasteurized, or jerky.

CFI visibility on the AAFCO Website

David Snell reported that problematic website issues have been resolved.

new business

Food and Feed Terms

Consistency in ingredient definitions, such as whether to use the term “food” or “feed” or both, was discussed. It was noted that thoroughly investigating the food-feed issue would be a heavy undertaking for AAFCO. One proposal mentioned was to add disclaimers in documents to explain reasons for a decision to use of food or feed. Also proposed was to use definitions for the terms that have already been made, although it was stated that this might cause confusion. Rather than dedicate resources in pursuing a solution to the food-feed issue, it was mentioned that differences can arise based on a word’s context and thus AAFCO should not be too rigid with terminology. Also discussed was the fact that the use of food or feed can be addressed on a day-to-day basis by each investigator. After discussion, no action was taken.

Ingredients to Move, Remove

87.9 Ammoniated Cottonseed Meal in section 87, Special Purpose Products, is a duplicate definition of 24.14 Ammoniated Cottonseed Meal in Section 24, Cottonseed Products.

On a motion made by Falina Hutchinson, seconded by Jordan Johnston, it was resolved to remove 87.9 Ammoniated Cottonseed Meal from Section 87. Motion carried.

12.8 Barley Protein Concentrate is listed as a Barley Product. Should it be moved to section 15, Brewers Products?

Dan King noted that only one company makes barley protein concentrate as far as he is aware and that it is not a brewer’s product. No action taken.

Enzyme Marketing Coordination Document

On a motion made by Marissa Kost, seconded by Jordyn Johnston, it was resolved to create a work group to review the enzyme marketing coordination document. Motion carried.

The work group is being formed to discuss enzyme labeling issues. During the meeting Emily Helmes, Richard Ten Eyck, Jordyn Johnston, and a representative from AFIA indicated willingness to participate.

Ingredient Section Update

The committee noted that each investigator is being asked to review the section relevant to their work and make suggestions, if necessary, particularly when an ingredient is found to have been listed in the wrong section.

AVA, ODI Survey

Richard Ten Eyck reported that beta testers are being recruited for reviewing the Ava artificial intelligence system. He added that a work group is seeking input on how to proceed with testing the ODI system. Both systems are designed to help inspectors and staff identify covered ingredients and terms found on labels with the goal of saving time. It was mentioned that eventually only one of these two systems may be chosen for common use.

Dr. Haley Larson Presentation

Dr. Haley Larson of Kansas State University-Olathe gave a review of a new state government and higher education collaboration, which since January 2025, has been working on a scientific review of new animal food ingredient submissions. The Scientific Review of Ingredient Submissions (SRIS) effort emerged from the 2024 dissolution of the memorandum of understanding (MOU) between the Food and Drug Administration and AAFCO. The MOU had covered ingredient definition reviews. Dr. Larson reported that with the addition of Dr. Garret Ashabranner as program manager, SRIS is now fully staffed and is expected to be formally launched by the end of 2025.

Dr. Larson discussed the pathway for submitting a data package, beginning with a submission received by an AAFCO investigator and passed on to SRIS. SMEs are being recruited now to work with SRIS. Dr. Larson outlined the ongoing process for recruiting and training SMEs, making sure that top scientific minds are utilized, conflicts of interest are prevented, and safety is ensured. A three-tier evaluation process was described. Dr. Larson explained that SRIS plans to assemble SME panels. Each panel will conduct preliminary reviews of ingredient submissions with the possibility of SRIS requesting more information before allowing a review to move forward. Dr. Larson said between two and five members would serve on each panel. A workshop on the new pathway will be held in January 2026. Eventually, for each submission, a SRIS recommendation report would be made and shown to a submitter for review before being forwarded to AAFCO. Any stakeholder seeking more information about the SRIS process is encouraged to reach out through an AAFCO investigator.

NEXT MEETING

The next meeting was not scheduled.

ADJOURNMENT

On a motion made by Mark LeBlanc, seconded by Bailey Whiten, and carried unanimously, it was agreed that there was no further business to transact; the meeting closed at 4:21 p.m.

Attachment B- CFI Subcommittee Submissions Report, August 2025

CFI_ID	Name of Ingredient:	Status
CFI_1147	Dates	Recommended
CFI_1152	Pumpkin Seed	Recommended

CFI_1160	Cantaloupe	Recommended
CFI_1161	Honeydew	Recommended

Not Recommended:

CFI_ID	Name of Ingredient:	Status	Reason For Decline
CFI_1134	Haba	Does Not Meet	The product submission was written in a language other than US English.
CFI_1135	Ahiflower® (refined Buglossoides arvensis) seed oil	Does Not Meet	Refined and/or fractionated food products are not permissible on the common food index. Please consider submitting your product to CVM via the GRAS or FAP pathway.
CFI_1136	barley	Deleted	Barley is being removed from the submission list per the request of the submitter who states it was submitted in error. I received an email from the submitter on 2-24-2025.
CFI_1137	Broccoli	Does Not Meet	The proposed product is already on the CFI.
CFI_1138	pea fiber	Deleted	Pea fiber has been deleted from the list at the request of the submitter via email on 2-24-2025.
CFI_1139	IQF Saskatoon Berries	Does Not Meet	The inclusion of therapeutic claims in the alternative purpose section of your submission. Products listed on the common food index must be intended to provide taste, nutrition or aroma, and not structure/function claims.
CFI_1140	Muskmelon (see CFI_1160)	Merged/Reassigned	The submitted product "Muskmelon" has been combined with your submission of "Cantaloupe" which will be renamed as Cucumis melo (Cantalupensis variety). The CFI sub-committee will be reviewing the revised submission on April 10th and anticipates having an answer back to you by April 11th. As of 6-25-25 this item has been merged into two new submissions, CFI_1160 and CFI_1161.
CFI_1141	Cucumis melo (Cantalupensis cultivar) (see CFI_1160, CFI_1161)	Merged/Reassigned	This submission has been broken into 2 separate submission, Cantaloupe (CFI_1160) and Honeydew (CFI_1161)
CFI_1142	Dates (see CFI_1147)	Merged/Reassigned	submitters. When this occurs, the CFI sub-committee selects the initial submission, combines any submitted data, and notifies additional submitters of their intent. To help you to continue following the submission of "Date", on or about May 1st, AAFCO will publish those products the CFI sub-committee has deemed as "Meets" for public comment.
CFI_1143	Broccoli	Does Not Meet	This item already exists in the Common Food Index.
CFI_1144	Rose Hip	Deleted	This submission is actually a question for AAFCO and not a CFI submission.
CFI_1145	fresh carrots/fresh sweet potato cooked mixture	Deleted	Not an actual submission to the CFI
CFI_1146	Tapioca maltodextrin fibre	Does Not Meet	food is not a whole food, but rather a derived ingredient following the processing of other whole ingredients. The CFI recommends that the submitter reach out to CVM's Division of Animal Foods to determine if Food Additive Petition is the proper pathway for approval.

CFI_1148	Calcium Stearate	Does Not Meet	This ingredient is already defined under CFR 573.280 and therefore, is not appropriate for inclusion in the CFI,
CFI_1149	Quercetin	Does Not Meet	food is not a whole food, but rather a derived ingredient following the processing of other whole ingredients. The CFI recommends that the submitter reach out to CVM's Division of Animal Foods to determine if Food Additive Petition is the proper pathway for approval.
CFI_1150	Eleusine indica	Does Not Meet	food in that it is not a common food. There were also additional concerns that the submitted product may; 1. inadvertently be used to make therapeutic claims, and 2. there is no safety data available.

CFI_ID	Name of Ingredient:	Status	Reason For Decline
CFI_1151	Tapioca Fibre	Does Not Meet	food in that it is not a whole food, but rather a derived ingredient following the processing of other whole ingredients. The CFI recommends that the submitter reach out to CVM's Division of Animal Foods to determine if Food Additive Petition is the proper pathway for approval.

MINUTES OF THE INSPECTION AND SAMPLING COMMITTEE ANNUAL MEETING
HELD AT THE HILTON OMAHA
1001 CASS STREET
OMAHA, NEBRASKA
AUGUST 5, 2025, 9:35 A.M. CT

MEMBERS:

Jessica Gore (Co-Chair; via teleconference)
Blaine Brown (Co-Chair)
Jamie Spencer (Co-Chair)
Jordan Mancini
Barb Schroeder (via teleconference)
Chelsea Mills
Chris Olinger
Daniel Zangari
Holly Jewell
Jason Fields
Martin Pousson
Jamie Spencer
Jim True
Landon Kidd
Laura Scott
Lloyd Payne (via teleconference)
Madison Phillips
Samantha Moran-Defty
Wayne Pendleton
Wendy Powell
Brittany Clark

ADVISORS:

Felicity Stewart
Stephanie Adams
Mary Paulson
Chris Olinger
Leann Meyer

GUEST:

Lori Goshert — Recording Secretary, Minutes Solutions (via teleconference)

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 9:31 a.m.

WELCOME AND OPENING REMARKS

Blaine Brown welcomed the Committee.

BASIC INSPECTOR TRAINING SEMINARS (BITS) AND ADVANCED INSPECTOR TRAINING SEMINARS (AITS)

2025 BITS Update

Blaine Brown reported that registration is open for BITS 2025, scheduled for September 22 to 26 in Harrisburg, Pennsylvania. The base rate needs to be completed by the end of August, 2025. He advised that new inspectors be registered as soon as possible.

A host is needed for BITS 2026. Inquiries should be directed to Blaine Brown.

2025 AITS Review

Jessica Gore reported that AITS 2025 took place on June 3 to 5 in Savannah, Georgia. There were 36 attendees from 19 states, but no attendees from the Food and Drug Administration. Topics included current manufacturing requirements, ingredient traceback and traceforward, advanced feed labeling, medicated feed labeling, and aseptic sampling as well as a new topic, environmental monitoring. On the last day, Michael Ferjak delivered a talk on investigative report development. The event went well, and all participants were engaged.

AITS 2026 will take place in South Carolina within the first two weeks of June, with the location and dates to be announced. A host state is needed for 2027.

WORKGROUP UPDATES

Bulk Tote Sampling Method Workgroup

Jamie Spencer reported that a proposal was sent out and three applications were received. The Workgroup is in the process of selecting a candidate and will notify the Committee when a decision has been made.

Inspector Guidance Tool for PC and cGMP Inspectors Workgroup

Wendy Powell reported that the Workgroup has met several times over the past year and has finished adding most of the content for the inspection type tabs. The Workgroup is continuing to review content for risk and categorization questions; she noted that it is not possible to create a full set of these due to differences between states. There will be a guide describing how states can develop questions and assign categorizations based on weight. A decision tree is being developed. Each Excel tab is being reviewed to resolve lingering questions and ensure a consistent format.

In August and September 2025, the Workgroup will discuss how to connect the tabs and automate the toolkit so that the decision tree can gather information from other tabs. An Excel expert is necessary for this work, whether from within the Workgroup or the AAFCO membership or from outside the Association. It is hoped that the majority of the content will be ready for the mid-year meeting in January 2026.

AAFCO-Branded Sampling Equipment Workgroup

Jamie Spencer reported that the Workgroup has not experienced much progress regarding AAFCO-branded tools. The steam cutter that was designed weighed 10 pounds and was on a 10-foot pole, making it impractical to use. The Workgroup is considering sending out a survey to assess what tools people might need. Anyone who has a need for a tool for sampling should notify the Workgroup so that it can be developed.

The Workgroup has new lightweight, streamlined triers for sale.

Chain of Custody Workgroup

Blaine Brown shared that the chain of custody document of best practices for sample collection has been slated for the end of Chapter 3 in the AAFCO Inspectors Manual. It is now under review by the Workgroup. Once this task is finished, the Workgroup will likely be disbanded.

AAFCO Inspectors Manual Update Workgroup

Chelsea Mills reported that the AAFCO Inspectors Manual Update Workgroup has reviewed the manual several times and made revisions. It will be sent to the Committee for approval soon, and the publication process will start. Because manual information changes constantly, it will be necessary to keep a list of items to update.

Environmental Sampling Workgroup on Addition to AITS Training

Jessica Gore reported that we were tasked by NASDA in implementing a true environmental sampling for pet food or residue. Environmental sampling breakout session was implemented into the AITS training for the first time in June of 2025. It was well received, with most attendees stating they had never been exposed to this type of training. Mock up/Hands on sampling at AITS. AFDO offers in-person train the trainers training-send survey to states on who would be interested

Hazards Reference Guide Workgroup Update

Wendy Powell reported that the Workgroup's first meeting was a brainstorming session, and it has met regularly since. The Workgroup plans to incorporate four broad categories of hazards for the guide: common hazards across multiple species, hazards unique to individual species, types of manufacturing and equipment, and association with carryover issues, for example, medication or ingredients with toxicity. Workgroup members are creating a list and will later collect content from a variety of resources, organize it, and decide on the formatting.

NEW BUSINESS

Jim True-sampling labels-if anyone bought them from Mark let Jim know how they work for you.

ADJOURNMENT

Jamie Spencer motioned to adjourn
Second-Madison Phillips
9:57

ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS (AAFCO)
1800 SOUTH OAK STREET, SUITE 100
CHAMPAIGN, ILLINOIS

MINUTES OF THE LABORATORY METHODS AND SERVICES COMMITTEE MEETING
HELD AT THE HILTON OMAHA
1001 CASS STREET
OMAHA, NEBRASKA
AUGUST 5, 2025, 8:00 A.M.

MEMBERS PRESENT:

Erik Pearson (Co-Chair)
Dominika Kondratko (Co-Chair)
Josh Arbaugh
David Snell
Teresa Rygiel
Ametra Berry
Rebecca Moseley
Naomi High
William Hoek
Brenda Snodgrass
Tai Ha
Michelle Swarbrick
Nancy Thiex
Robin Johnson
Solomon Kariuki
Dancia Wu

ADVISORS PRESENT:

Lars Reimann (virtual)
Leo Schilling
Jeff Horst
Ken Riter
Molly Peters (virtual)
Andy Crawford (virtual)

VIRTUAL ATTENDEES:

Abie McCollar
Alex Bombich
Gail Swinford
Julie Barry
Lawrence Novotny
Denice Mittelstaedt
Melissa Nichols
Susan Humphries
Srinu Chigurupati
O McKnight
Rick Jeswein
Robyn Randolph
Tadas Kargelis

OTHERS PRESENT:

Jenny Combs
Alan Harrison
Daryl Clinton
Melanie Banta
Suzanne Rajewski
Jason Badgett
Kari Nichols
Madison Smart
Ian Banks
Eileen Stochl
Michelle Sandau
Brian Heikes
Mercedes Thelen
Rebecca Kern-Lunbery
Zachary Khul
Kimberly Roewe
Alicia Hemphill
Mariah Ponton
Brian Pickerel
Brian McLorin
Nate Larson
Sarah Hubert
Joe Ward
Jackie Lissolo
Berit Foss
Matt Nichols
Justin McKenny
Darrell Johnson
Chad Vietz
Hunter Buffington
Liberty Sibanda
Brian Schuld
Rob Shirley

Sandra Tudge, Recording Secretary, Minutes Solutions Inc. (via teleconference)

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 8:00 a.m.

2. REVIEW AND APPROVAL OF AGENDA

On a motion made by David Snell, seconded by Tai Ha, it was resolved to approve the agenda for the Laboratory Methods and Services Committee meeting as presented. Motion carried.

3. INTRODUCTIONS

All members and guests introduced themselves, and the sign-in sheet was completed.

4. ANALYSIS OF MYCOTOXINS IN DISTILLER'S GRAINS

Erik Pearson introduced Chad Vietz of the Nebraska Department of Agriculture, who provided an overview of mycotoxins, particularly focusing on contamination in grains. He discussed the constraints of traditional detection methods of HPLC, LC/MS, and ELISA, and then highlighted the functions and benefits of lateral flow assays or strip tests. These assays significantly reduce the need for equipment, reagents, analysis time, and costs. However, it was emphasized that alternative confirmation methods remain necessary.

Strip tests are particularly beneficial for initial screening, with satisfactory validity results obtained when compared to HPLC. It was noted that the test kits cost approximately $250 (40 strips) and come with a list of approved commodities, including dried distillery grains. While the LOD has not been published, it is expected that this information can be obtained from the manufacturer upon request via email.

5. USE OF NEAR INFRARED (NIR) SPECTROSCOPY IN A REGULATORY ENVIRONMENT

Alan Harrison, Director of Feed and Milk at the University of Kentucky (UK), provided an overview of NIR spectroscopy and its applications in agriculture. A history of NIR use at the University of Kentucky, College of Agriculture Food and Environment, was presented, noting that its use implementation began in November, 2020. The NIR screening process used at UK was reviewed, emphasizing that this includes human review. Analytes rejected by NIR screening proceed to wet chemistry testing. It was noted that analytes cannot be failed based solely on NIR results.

He then reviewed the process and data used to evaluate NIR screening and concluded that regulatory decisions based on NIR results would have been consistent with those made using wet chemistry. The laboratory's policy requires two wet chemistry values for a sample to be classified as deficient.

Jennifer Combs, Regulatory Associate, Division of Regulatory Services, provided an overview of the benefits of NIR, including cost savings, reduced turnaround time, adequacy of NIR results for service samples, and enhanced reporting. Unexpected benefits include identifying potential problem samples before wet lab testing, detecting inflated fat guarantees, using NIR-estimated moisture value rather than the label guarantee to calculate the mineral guarantees.

The drawbacks of NIR were discussed, including upfront investment costs, increased management time for data review and test approval, reduced labor demands, challenges related to analyte mix and laboratory bottlenecks, integration of NIR screening into existing laboratory systems, and the need to account for NIR downtime. Considerations for using NIR screening were also reviewed.

Future plans and goals for NIR in the KY lab include assuming state forage testing from the Kentucky Department of Agriculture, purchasing an NIR scanner for forages, and building new models.

The attendees posed several questions regarding the modeling, and the application of NIR. Alan Harrison reviewed the criteria for deciding when the model should be updated, and the process for determining the use of NIR. It was noted that newer feed ingredient samples would generally be forwarded for wet chemistry testing.

6. INTEGRATION OF ROBOTICS FOR SAMPLE PREPARATION AND AUTOMATION

Leo Schilling of Eurofins SF Analytical Laboratories provided an overview of how robotic systems can streamline online sample preparation, and presented automation strategies for sample accessioning, storage, and retrieval, and examples of integration with analytical systems and LIMS.

The benefits of robotics were reviewed, specifically in terms of minimizing human error and manual repetitive processes, gaining efficiencies, improving quality, and long-term savings. Laboratory staff should be made to feel empowered through automation by offering hands-on experience with advanced technology, shifting from repetitive tasks to analytical thinking, greater productivity, upskilling and career development, as well as fostering collaboration, resiliency and flexibility.

Considerations for robotics implementation were outlined, including a phased adoption approach, emphasis on validation and compliance through data equivalence with manual sampling, and the importance of training and change management.

Potential artificial intelligence (AI) innovations for the laboratory were reviewed, including AI driven sample prioritization, integration with cloud-based LMIS, and remote monitoring. Attendees were encouraged to take advantage of AI tools currently available, such as Microsoft AI products.

Leo Schilling suggested that the most approachable technique for many laboratories is a sampling preparation robot. To gain leadership support for automation, he recommended beginning with a well-defined process, such as a LEAN project, which focuses on the proposed improvement. A return-on-investment analysis should also be included. A dedicated team and resources aligned with the project goals are also essential for success.

7. CHALLENGES OF MANAGING A STATE FEED LABORATORY

Rebecca Moseley State Chemical Laboratory Coordinator, Alabama Department of Agriculture and Industries, highlighted the challenges faced by state feed laboratories in meeting sample testing turnaround expectations, emphasizing the impact of staffing limitations. Other internal challenges cited include difficult samples, laboratory maintenance, and ISO accreditation activities.

The attendees discussed ways they address turnaround challenges, including the following:

- Flexible staff scheduling
- Prioritizing samples and adjusting timing of sample preparation
- Requesting lab analysts to prepare samples one hour per day
- Negotiating contracts with courier for online ordering

Rebecca Moseley reviewed external factors that limit turnaround time for the Alabama State laboratory, including supply chain issues, lengthy accounting process, scheduling repairs and maintenance, power outages, and building maintenance issues.

Several participants reported also experiencing power outages. The meeting discussed potential solutions, such as purchasing back-up generators and/or uninterruptible power supplies (UPS) to allow for the safe shutdown of equipment, installing UPS systems for computers, and developing backup procedures. It was noted that all UPS systems require a maintenance plan.

The meeting discussed other external challenges, including sample delivery delays, sampling packing issues, and lost samples. Approaches for overcoming factors influencing unrealistic turnaround time expectations were noted, including:

- Inviting field inspectors to spend a day in the laboratory and vice versa
- Regularly communicating challenges to Management
- Cross-training and mentoring of laboratory staff
- Presenting at the yearly Inspectors meeting by laboratory staff
- Integrating laboratory time into onboarding for all staff
- Hosting coffee with the scientist for office staff and tours of the laboratory

Methods of boosting employees' morale for increased retention were also discussed, including celebrating birthdays and work anniversaries, field trips, holding lunches for social time and for learning, and hosting an in-office book club.

The meeting recessed from 10:32 a.m. to 10:45 a.m.

8. DISTILLERS PRODUCTS PROCEDURES WORKING GROUP

Joe Ward of Distillers Technology Council noted that the Council and ASTM have established a working group to recommend testing procedures for distillers' products for each analyte. He encouraged participants to contact him at Joe.ward@distillersgrains.org if they are interested in participating in the working group.

9. WORKING GROUP UPDATES – LMSC WG LEADS

9.1 Ash

ACTION – Dominika Kondratko and Erik Pearson will ensure the resource documents are moved to Basecamp.

The Ash Working Group did not meet since the mid-year meeting. The resource documents collected by the previous Working Group have been uploaded onto SharePoint for the Working Group's review. Participants were encouraged to contact Dominika Kondratko or Erik Pearson if they are interested in volunteering on the Working Group. Eileen Stochl is interested in joining the working group.

9.2 Metals

ACTION – Dominika Kondratko will confirm SharePoint access for the Metals Working Group Chair.

The Working Group has met several times to gather documents. The Committee agreed that the Metals Working Group would continue consisting of Michele Swarbrick, Melanie Titley, William Hoek, Brian Dawkins, and Justin McKenney.

9.3 Fat-Soluble Vitamins

Ken Riter, Co-Chair of the Fat-Soluble Vitamins Working Group, confirmed that the Texas State Chemist has not yet issued their publication on vitamin D. Robin Johnson, Co-Chair, reported that some progress has been made on vitamin A testing, with encouraging results. The Working Group plans to meet shortly to discuss further testing. Participants were encouraged to volunteer for this group.

9.4 Moisture Best Practices

The Committee agreed to continue pursuing Karl Fischer testing on dry and wet pet foods and compare testing with the loss on drying (LOD) methods. It was reported that Lawrence Novotny would be stepping down as Chair of the Working Group. Eileen Stochl, Brian Schuld, Darrell Clinton , Dominika Kondratko volunteered to continue on the Working Group.

9.5 Dietary Fiber

On a motion Darrell Clinton, seconded by Robin Johnson, it was resolved to accept creating a representative sample of dietary fiber as proposed. Motion carried.

Josh Arbaugh reported that the Working Group met several times and has proposed purchasing dry dog food through AAFCO's proficiency testing program for sampling by laboratories that enroll for a small fee. The goal is to engage 30 to 50 laboratories. The purpose of the study is to evaluate matrices without limiting the total dietary fiber method, with the aim of identifying a valid method for pet food labeling. Sample preparation and shipment are planned for fall 2025, with data collection targeted for completion before the midyear meeting. Method validation will follow, as states acquire the necessary equipment.

The meeting discussed the definition of dietary fiber, and Josh Arbaugh noted the Working Group concluded that the testing method would define dietary fiber. The Committee emphasized the importance of communicating to participating laboratories that the purpose of testing is for labelling, not nutrition profiling. The Committee also discussed factors to consider for prioritizing matrix testing.

9.6 Quality Assurance (QA)/Quality Control (QC)

ACTION – Erik Pearson will draft a short QA/QC Subcommittee purpose for the Committee to recommend for Board approval.

The QA/QC guidelines must be updated to meet the ISO standards. David Snell, Denise Mittelstaedt, Erik Pearson, Leo Schilling, and Susan Humphries volunteered to continue on the Subcommittee. Brenda Snodgrass provided a brief history of the previous guideline update.

Following discussion on the QA/QC Subcommittee charge, the Committee agreed that the Subcommittee should review the current QA/QC guidelines for alignment with ISO/IEC 17025:20017 requirements and adjust the guidelines as needed.

9.7 AAFCO Certified Laboratory

The Certified Laboratory Working Group was renamed the Laboratory Network Working Group. An optional survey will be distributed to each State's Laboratory Director. The goal is to create searchable laboratory information to be housed on AAFCO's website in the regulatory section.

9.8 Emerging Contaminants

The Working Group compiled a list of relevant emerging hazards in the food chain to serve as an information repository for feed and pet food industry laboratories. The goal is to provide laboratories with quality information on compounds, including testing methods and products. The repository will start with one or two analytes and be maintained as an evergreen resource.

The Committee reviewed the draft list and discussed criteria for identifying emerging contaminants. The Food and Drug Administration will be invited to join the Working Group and attendees were encouraged to participate. An update on the repository's development will be shared at the 2026 midyear meeting.

10. HEMP UPDATE

Erik Pearson introduced Hunter Buffington of Agriculture Policy Solutions and ASTM International. She noted that ASTM's D37 Committee on Cannabis has recently been reconfigured as the Committee on Cannabis and Hemp, and encouraged attendees to join ASTM International and the Committee.

An overview was provided on ASTM International Industrial Hemp Subcommittee's Standards for Hemp Grain and the D8440-2 Specifications for Food Safety and Quality of Hempseed Products Intended as Food. It was noted that the latter will be updated in 2026. The membership of the Analytical Method Development Task Group was provided, noting AAFCO members Josh Arbaugh and Teresa Rygiel.

Regarding ASTM hemp cannabinoid quantification methods development, the D8375-23 (LC-MS/MS) is currently being validated. Work is underway on testing cannabinoid concentration in cannabis flowers and developing an education guide for using hempseed byproducts in livestock feed. Challenges were noted in the GC-FID method validation process, due to a reduced lower limits of quantification in the Food and Drug Administration's (FDA) approved definition for hempseed meal from 10 ppm to 2 ppm THC. International research regarding safe THC thresholds was discussed. It was noted that hemp crops could be an economic opportunity for United States' farmers; however, consumer confidence is necessary for expansion.

The meeting discussed alternative methods to GC-FID for testing, noting their ease of use with comparable results. Leo Schilling suggested investigating a sample concentration factor in preparation to obtain a lower limit of detection. Hunter Buffington encouraged participants to join ASTM's Hemp Working Group by contacting her at hunter@agpolicysolutions.com .

11. BEST PRACTICES FOR MYCOTOXIN ANALYSIS

On a motion made by Brenda Snodgrass, seconded by Darrell Clinton, it was resolved to form a Mycotoxin Analysis Working Group. Motion carried.

The Working Group was dissolved at the 2025 midyear meeting due to personnel changes, the complex scope for the group, and external activities. The Committee agreed that a Working Group consisting of regulators and industry would be timely given the recent panel discussion; however, the scope must be well defined within the context of international work on the topic. The working group will be led by Leo Schilling with Darryl Clinton, Joseph Ward, Brian Schuld, Ken Ritter, Solomon Kariuki, Matt Nicholas, Liberty Sibanda, and Berit Foss joining the group.

The Committee discussed a stepwise approach, with the goal of drafting an internationally harmonized best practices paper by the 2026 midyear meeting. Consideration of emerging mycotoxins by the Working Group was also discussed.

The meeting recessed for lunch from 11:30 a.m. to 1:30 p.m.

12. REGULATORY SURVEY RESULTS

Some preliminary data from the regulatory survey has been collected. It is anticipated that the data analysis will be available for presentation at the 2026 midyear meeting.

13. QUALITY ASSURANCE SUBCOMMITTEE CHARGE FOR BOD

This item was discussed under Working Group updates.

14. APHL/AAFCO WEBINAR

Erik Pearson introduced Robyn Randolph, Program Manager, APHL, who highlighted APHL's advocacy efforts over the past year and its upcoming initiatives. An overview was provided of APHL's consolidation of tools and resources for human and animal food laboratories (see https://www.aphl.org/programs/food_safety/human-and-animal-food-testing/Documents/HAF_Benefits_Flyer_2024.pdf.).

APHL's focus on fostering career pathways was reviewed, including fellowships, internships, and leadership empowerment programs. Highlights of APHL's One Health initiatives were also presented. An overview of the Regulatory and Laboratory Training System (RLTS) based on national curriculum standards was provided, highlighting the two animal food courses under development.

Robyn Randolph emphasized APHL's continuous search for opportunities to develop training, including collaborating with AAFCO, and encouraged the attendees to contact her at Robyn.Randolph@aphl.org.

The Committee inquired about future funding opportunities for laboratories working toward ISO accreditation. Robyn Randolph noted that APHL traditionally engaged a consultant to provide technical expertise for accreditation; however, this did not occur in 2025 due to fiscal constraints. Instead, participants were encouraged to explore support through APHL's training fund opportunities.

15. OTHER BUSINESS

15.1 Update On August 2024 Action Items and AAFCO Strategic Plan Objectives

This item was deferred.

15.2 Roundtable Discussion

This item was deferred.

16. ADJOURNMENT

On a motion duly made, seconded and unanimously carried, it was agreed that there was no further business to transact; the meeting closed at 3:07 p.m.

DISCLAIMER

The above minutes should be used as a summary of the motions passed and issues discussed at the meeting. This document shall not be considered a verbatim copy of every word spoken at the meeting.

Dominika Kondratko	Erik Pearson
Committee member	Committee member
09/10/2025	09/10/2025
Date	Date

ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS (AAFCO)
1800 SOUTH OAK STREET, SUITE 100
CHAMPAIGN, ILLINOIS

MINUTES OF THE MODEL BILL AND REGULATIONS COMMITTEE MEETING HELD AT THE STATEHOUSE CONVENTION CENTER 101 EAST MARKHAM STREET LITTLE ROCK, ARKANSAS AUGUST 5, 2025, 10:45 A.M. CT

MEMBERS:

Dan King	Co-Chair
Jordan Mancini	Co-Chair
Tim Tyson	
Josh Arbaugh	
Mike Davidson	
Kristen Green	
Steve Wenning	

ADVISORS:

Pat Tovey
Angele Thompson
Stephanie Adams
Dan Frank
Leann Meyer
Cathy Alinovi
Bill Bookout
Renee Streeter
Angela Mills

GUESTS:

Ed Boice	Recording Secretary, Minutes Solutions Inc. (via teleconference)

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 10:45 a.m.

2. COMMITTEE ACTIVITIES

2.1 SUIP No. 7: Update Proposal to MBRC from SUIP WG

Kristen Green made a motion, seconded by Josh Arbaugh, to approve incorporating SUIP No. 7 into the MBRC. Motion failed.

This SUIP is one of many SUIPs the Committee is reviewing and evaluating. Now that rawhide has an official definition, the Committee agreed SUIP No. 9 should be altered to be easier to read and added into the model bill.

Some concern was expressed regarding the language. There is evidence that these products cause health concerns for humans. A retroactive exemption may not be appropriate. It was noted that the language reads that adulterated feed has no exemptions.

Concern was expressed that the incorporation will cause future ramifications, as the states consider approving amendments that the Committee has not considered. Cathy Alinovi confirmed that the Committee considered other areas to place the SUIP and will consider other suggestions.

It was noted that modifying commercial feed laws would cause every state to consider accepting the adoption. Political committees will add and remove language as they consider what the Committee intended in their initial language. Also, states are not required to approve the adoption. Cathy Alinovi clarified that the Committee will not incorporate all the SUIPs.

There was some support expressed for turning SUIP No. 7 into a regulation, and it was noted that various regulators have suggested to the Committee that this SUIP be turned into a regulation. The Committee considered if creating a guidelines document would be a possible solution.

The Committee discussed creating a work group to analyze this SUIP, but agreed not to proceed because of the lack of interest.

The Committee agreed to vote against the motion because of a lack of interest and support.

2.2 SUIP No. 9: Dried Insects for Wild Bird Food Amendment

On a motion made by Kristen Green, seconded by Steve Wenning, it was resolved to amend SUIP No. 9 to include specialty pets. Motion carried.

The amendment is to include other animals that eat insects.

2.3 Charge from BOD: Review Numbering System for SUIPs, Delete SUIPs

On a motion made by Kristen Green, seconded by Josh Arbaugh, it was resolved to create a work group to create a numbering system for the SUIPs. Motion carried.

A numbering system needs to be created as the Committee changes and moves SUIPs. One option is numbering the SUIPs based on the year they are adopted and order they are approved (e.g., SUIP No. 2025-1).

Steve Wenning, Josh Arbaugh, Cathy Alinovi, and Pat Tovey volunteered to join the work group.

2.4 License Fees

On a motion made by Kristen Green, seconded by Josh Arbaugh it was resolved to create a work group to research previous attempts to unify license fees for all U.S. states. Motion carried.

Some steps have been taken to harmonize license fees between all states for the last 20 years, but the unification has never been completed due to the amount of work it would take to harmonize all the costs. AAFCO agreed to attempt again to unify all the fee costs, and to research the history of the attempts for presentation at the Committee's next meeting. It was

noted that changing a small number of the fees slowly over time instead of changing the fees all at once could be beneficial.

It was highlighted that the feed industry has spent the last five years creating a universal application, and has begun to create a universal interface. The change is a significant undertaking since each state has their own systems, servers, and naming conventions, but is overall helpful and needed.

Austin Therrell, Dan King, Leah Wilkinson, and Stephanie Adams volunteered for the work group. Pat Tovey volunteered to share his knowledge of the subject with the group.

2.5 Raw Milk for Pet Food

Cats are contracting fatal diseases such as H5N1 from raw milk. The Committee's concern is that humans will contract H51 and possibly other diseases from drinking raw milk for pets. There was a small rise in the northwest U.S. of cats dying from H5N1, and 15 cats out of 75 million have contracted H5N1. Some states recently changed to using human consumption laws for pet foods, which is not necessarily recommended. It was noted that the item is currently a heavy political topic.

3. NEXT MEETING

The date of the next meeting was not scheduled.

4. ADJOURNMENT

It was agreed that there was no further business to transact; the meeting closed at 11:49 a.m.

DISCLAIMER

The above minutes should be used as a summary of the motions passed and issues discussed at the meeting. This document shall not be considered a verbatim copy of every word spoken at the meeting.

Director	Director
Date	Date

ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS (AAFCO)
1800 SOUTH OAK STREET, SUITE 100
CHAMPAIGN, ILLINOIS

MINUTES OF THE PROFICIENCY TESTING PROGRAM COMMITTEE MEETING
AUGUST 4, 2025, 2:15 P.M. CT

MEMBERS PRESENT:

Dancia Wu (IN) Darrell Clinton (IN) Michele Swarbrick (MN)
Rebecca Moseley (Chair/AL) Teresa Rygiel (Chair/FL) Brenda Snodgrass (AAFCO)
Nancy Thiex (AAFCO Life) Tai Ha (NE) Naomi High (NC)
Ametra Berry (GA) Josh Arbaugh (WV)
Brenda Snodgrass (PT Program Manager / Life Member)

ADVISORS PRESENT:

Ken Riter (PFI NPAL) Leo Schilling (Eurofins)

VIRTUAL ATTENDEES:

Andy Crawford (AAFCO) Mo Kieffer (Able Labs) Alexa Bombich (AAFCO)
Denise Mittelstaedt (NM) Gail Swinford (FDA) Melissa Nichols (MO)
Lars Reimann (Advisor/ Eurofins)

OTHERS PRESENT:

Zachary Kuhl (WV)
Solomon Kariuki (U of KY)
Kimberly Roewe (Phibro Animal Health)
Kari Nichols (Eurofins)
Stephanie Peterson (Midwest Labs)
Brian Pickerill (Midwest Labs)
Michelle Sandau (Post Consumer Brands)
Mariah Padton (Charles Feeds)
Madison Smart (NB)
Chad Vietz (NB)
Robin Johnson (MT)
William Hoek (NY)
Brian Schuld (MxNS)
Alicia Hemphill (NC)
Kristen Mintle (Romer Labs)
Jenny Bailie (NutriQuest)
Paul Mignon
Mercedes Thelen (WY)
Erik Pearson (NB)
Dominika Kondratko (CO)
Suzanne Rajewski (IA)
Melanie Banta (IA)
Jason Badgett (IA)
Jeff Horst (Agri-King)
Julie Berry (virtual)
Justin McKenney (NPAL, virtual)
Molly Peters (Tyson Foods, virtual)
Tadas Kargelis (virtual)

Susan Humphries (FDA, virtual)
Bethany Young Recording Secretary, Minutes Solutions Inc. (virtual)

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 2:15 p.m.

2. REVIEW AND APPROVAL OF AGENDA

On a motion made by Brenda Snodgrass and seconded by Michele Swarbrick, it was resolved to approve the agenda for the Proficiency Testing Program Committee meeting as presented. Motion carried.

3. INTRODUCTIONS

All members and guests introduced themselves and completed the sign-in sheet.

4. PROGRAM LEADERSHIP AND ADMINISTRATIVE UPDATES

4.1 Quality Management System Update

Alexa Bombich explained that a rough draft had been sent to Brenda Snodgrass. She stated that they were projected to have the quality system fully updated by the May 2026 deadline. It was noted that the old standard had a specific clause written for preventative action. The 2023 version of the standard mentions risk instead of preventative action. They represent the same concept of mitigating identified risk and developing a corrective action plan. A surveillance desk assessment is expected in December 2025.

4.2 Committee Membership Update

4.2.1 Updated Roster

The updated roster was not discussed.

4.2.2 Basecamp Introduction

Rebecca Moseley shared that AAFCO shifted from SharePoint to Basecamp, which works better for Apple users. All communication going forward will be in Basecamp. Functionalities include email notification of documents added and the ability to chat with the group. It was noted that training tutorials are available. The PTP meeting agendas and minutes have been moved to Basecamp, and community members have been invited to join Basecamp.

5. UPDATE ON JANUARY 2025 ACTION ITEMS

The AAFCO Board voted to keep the PTP Committee and Lab Services Committee separate. The advisors had shared concerns that the PTP committee needed to stay separate because it runs like a business. Maintaining separation would allow Lab Services to focus on lab methods. Rebecca Moseley and Teresa Rygiel expressed appreciation for the input received from attendees that aided the Board in their decision making.

6. 2025 SUBSCRIPTION UPDATE

Brenda Snodgrass presented a four-year program participation comparison chart. She reported that, as of August 2, 2025, enrollments had increased compared to last year (200-220 labs for animal feed, 117-138 for pet food, 42-44 for minerals, 72-78 for mycotoxin), with the largest growth from international labs. Additional subscriptions were also added by labs whose requirements changed and needed to evaluate each chemist under separate scheme subscriptions. She noted that 43 labs signed up to participate in the laboratory sample preparation study, thanks in part to Nancy Thiex's outreach. Brenda provided an update on the budget from FY23 – FY26. The program is strong and bringing revenue into the organization. The program has been accredited since 2016.
Brenda Snodgrass reviewed the updated methods code list that was approved in August 2024. She noted the new 900.xx method codes that were added for those participating in the lab sample study. The codes are being updated as needed and are currently on revision four. The list has been emailed to participating labs and is available on the data-submitting website. When reporting results, participants were reminded to select a test method code and a sample prep code. She noted that aflatoxin should be reported in ppb, not ppm.

7. CUSTOMER FEEDBACK

Brenda Snodgrass reported that the Label Estimated Analysis now includes "Fiber, dietary total" as a result of the push to align labels with those for human food. Attendees from ISO 17025 labs stated that they solicit customer feedback through surveys, both paper and electronic, and record unsolicited feedback that is received. Brenda says survey monkey is not cheap. Josh said FASS can help the PTP with that survey just as they did for the board.
The group agreed that very little feedback is received despite repeated outreach efforts, leading them to assume that happy customers do not have much feedback to provide.

8. LABORATORY SAMPLING ROUND ROBIN UPDATE

Nancy Thiex presented the Analyte Summary Report for Round One of the Unground PT Study (Round 1). She provided recommendations to improve the data for Round Two of the study. Participants were advised to verify that units are properly reported, % vs ppm for mineral, report NPN as N, and to review the sampling training course. Denice mentioned a lack of a true control sample. Denice suggested a control ground sample from Mo Kieffer along with the Unground sample be sent out and have the labs test both to better compare the sampling error to the analytical error. Brenda said the reason they didn't send out 1 unground and 1 ground samples was because they already have that analytical data from the PT program.

The group discussed the nature of skewed data results that did not appear to be the result of sampling errors. Andy Crawford stated that the data was not atypical, and the shape of the curve is the key versus the small number of data points. Fiber data was the most concerning, and potential causes such as a lack of rinsing, variable methods to soak or shake samples, grinding process issues, and lack of a blind control sample were discussed. Nancy Thiex acknowledged that fiber analysis is particle size dependent, noting that as more data is received, they will look at particle size versus test data. It was determined that the working group would need to reconvene to review the data from the first and second groups and fine-tune what is needed in the study. Ken Riter noted that, since it was a study and not a true PT program, the working group could contact participants to ask clarifying questions about the data.

9. ARTIFICIAL INTELLIGENCE (AI) SOFTWARE DISCUSSION

On a motion made by Josh Arbaugh, it was resolved to form a working group to develop a request for services for statistical analysis work. Motion carried.

The group discussed Austin Therrell's inquiry on the potential use of AI for statistical analysis and whether a statistician would need to be hired when Andy Crawford retires. Brenda Snodgrass stated that European labs were using statistical analysis software but that it is possible that AI software is not interactive with any proficiency testing provider. Ken Riter noted that an expert would be needed to evaluate the output of any software. It was determined that there was a need to hire a statistician for upcoming projects and to provide continuity of operations as Andy Crawford approaches retirement. The working group tasked with creating a job description for a statistician consists of Josh Arbaugh, Ken Riter, Michele Swarbrick, and Teresa Rygiel, Brenda Snodgrass, and Andy Crawford.

10. ANALYTICAL VARIATION (AV) WORKGROUP UPDATE

Josh Arbaugh announced that Sally Flowers is no longer able to participate in the working group. He explained that an official decision has not been reached on releasing the new AV data run by Andy Crawford to the OP. Since most data was similar, the group discussed waiting to release it or to make the changes and add a few additional AVs that were missing. The next step is to seek feedback from industry and regulatory partners to determine if they have any concerns with making the data changes. After the August 2025 meeting, the working group will meet more regularly to determine an official recommendation to bring to the Board. They will also conduct outreach to get feedback on the decision. After the second round of sampling data is obtained, the group will evaluate the data and determine whether it can be used or if additional information is needed to look at the sampling error as they slowly build towards investigational allowance.

Josh Arbaugh noted that the longer-term goal is the bigger challenge of field sampling study information. Ken Riter raised the question of developing a sample study design. Josh Arbaugh suggested that, instead of the AAFCO issuing multiple RFQs, a group of committee members, who are experts in sampling, could develop a proposal that meets the exact needs of what the committee requires. They could then find a way to complete that in-house in a more collaborative way. Josh Arbaugh will follow up with the Board and the Chair of the Inspection and Sampling Committee (ISC).

11. OTHER BUSINESS

11.1 Open Discussion

Josh Arbaugh provided an update on a survey to determine where regulatory labs are with dietary fiber testing. Ten labs reported they could run dietary fiber. He added that the number may be skewed high, since the survey was for the regulatory program. He stated that he was aware of at least five regulatory labs that have started the process to run dietary fiber. He encouraged any labs running dietary fiber on PT samples to report the data so that the committee can start to see what labs are doing with that methodology. More data is needed, and the request has been shared with industry as well.

Josh Arbaugh reported that he and Brenda Snodgrass have access to AVA, the closed-source AI regulatory assistant demonstrated by Richard TenEyck. He instructed committee members to contact them if they had a question they would like to pose to the system. Repeated queries will help determine where there are gaps or other issues. He stated that it is a closed system limited to only the AAFCO site in order to prevent incorrect information, but there will be an opportunity to add specific references in the future. Leo Schilling suggested asking the Board if a process could be developed to request the addition of a resource link to AVA. The resource would then be reviewed to determine if it would be an appropriate addition for AAFCO and the community.

Josh Arbaugh asked what PT provider attendees were using for microbiological feed contaminants. The two providers mentioned were LGC Standards and AOAC. It was noted that LGC is expensive and there have been shipping issues with some packages that are not dangerous being held up in the Memphis distribution center while others that are more concerning seem to go right through. AOAC is also expensive and is for meat products. They do two rounds each year with 12 samples, four for each pathogen.

An attendee asked what prevented the PTP program from being able to offer such a program. The major deterrent was the cost of overnight shipping on ice. The PT samples are shipped at ambient conditions. Brenda Snodgrass shared other factors considered during the original conversations regarding providing microbiological samples. These included how a positive sample containing a microbiological value could be provided, how to get the pathogen into the feed, how to make sure it stays stable, and what type of stability and homogeneity testing would need to be done. It was determined that microbiologicals would not be included in the program. Those who needed microbiologicals went to international sources. Josh Arbaugh suggested that it might be something worth looking at again, since they are expensive for labs. It may not be economical to do, but if there is a way to offer a service that is quality and affordable, it is worth investigating.

Rebecca Moseley asked if there would be a follow-up call or survey sent to participating labs at the end of the lab sampling study to capture their feedback. Brenda Snodgrass indicated that they would email the labs asking for feedback and could schedule a conference call with the labs at the end of the study.

Michelle Swarbrick had a question on the last mineral sample sent out, round 2025-52. She reported that five of the 14 elements had a z-score of 2 and 3. She wondered how a homogeneity test was done on the scheme, since it was so spread out on many of the elements, and whether something was wrong with the sample. For example, cobalt had 15 of 26 fail with a z-score of 3 or 2. Brenda Snodgrass stated that, for the animal feed program, an expert lab is sent 10 bags to see if they can replicate the test result on all 10 bags. However, the minerals program may be different. She stated that she would review the data at the end of the month with Nancy Thiex and report what they find.

12. ADJOURNMENT

On a motion made by Brenda Snodgrass, seconded by Josh Arbaugh and carried, it was agreed that there was no further business to transact; the meeting closed at 4:40 p.m.

DISCLAIMER

The above document should be used as a summary of the motions passed and issues discussed at the meeting. This document shall not be considered a verbatim copy of every word spoken at the meeting.

Strategic Affairs Committee Report/Minutes
August 6, 2025
10:00 – 11:30 am
In Person/Virtual

COMMITTEE RECOMMENDATIONS:

- **Report acceptance.**
- **Recommendations:**

BOARD RECOMMENDATIONS:

- **Report accepted – add date**

ASSOCIATION ACTIONS:

- **Report accepted – add date**

Full Committee Members:

Linda Morrison	Kristen Green, Vice Chairperson		Dave Edwards
Erin Bubb	Brenda Snodgrass	Stan Cook	Scott Ziehr
Mark LeBlanc	Ali Kashani	Eric Nelson	E Weigner
Jennifer Godwin	Josh Arbaugh	Dan Danielson	
Ashlee-Rose Ferguson (Board Liaison)		Dan King	

Committee Advisors

Berit Foss	Pat Tovey	Leah Wilkinson	Charles Starkey
Bill Bookout	Julia Fidenzio	Kristi Krafka	

* Present
** Virtual

By-Laws Sub-Committee

Kristen Green (Chair) Erin Bubb Josh Arbaugh

Committee Report:

1. Strategic Plan
   - 2023-2025: Update
     - 2023-2025 Strategic Plan updates from Committee work (Attachment 1)
     - Closing out this plan cycle. Summary will be prepared and shared
   - 2026+: developing the next plan
     - Planning meeting with Board and Committee Chairs in September.

2. 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, add Kristen ~~Ken~~ (By-Laws SC), Linda, Stan and Austin (lead)

- Work outline started in the Bin. Business practices versus association practices need to be differentiated, perhaps with different sections in the PM. By-Laws Subcommittee did a review and made recommendations for a few other activities (Shared in Bin).
- The Board also developed a charge to form a BOD workgroup (Austin, ~~Ken~~ Kristen 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.
    - Preliminary review conducted to identify redundancies and organize categories to realign. Will use the 2024 OP version to resume. Have a path forward, categorizing in either OP or PM to eliminate duplication.
- Timing: anticipate report by Annual 2025.
- Update: Austin
    - Met end of 2023. Documents and workgroup report returned to Linda to finalize. Defined policy, guideline and procedures. Categorized to move between OP and PM. Goal is no redundancies in the two documents. Will be shared with Committee.
    - Work Group: Linda, Kristen and Tim W.
    - Timing: Goal is Midyear 2026.

3. Charitable Foundation
    - Board Charge: Executive Director's recommendation to charge the Strategic Affairs Committee with the task of reviewing the proposal to establish a new AAFCO 501(c)3 charitable foundation to be overseen by the parent AAFCO 501(c)5 organization, and to present a final recommendation back to the AAFCO Board of Directors by the 2024 Annual Meeting.
    - Working Group to review charitable foundation and make recommendations (Appendix 3)
        - Phase 1: Ashlee-Rose (co-lead), Dan D., Tim W., Austin, (Linda co-lead), Mark L.
        - Phase 2: add industry representatives Charles S., Leah, Dave F.
        - The Foundation basics have been discussed, including planned activities, budget and oversight. A few remaining items require investigation and discussion. Industry representatives have been added to finalize considerations.
    - Update: Linda
        - This activity has been paused while other priorities are addressed (i.e.: developing alternative ingredient pathway). Resumption will be considered fall 2025.

4. Business Meeting Guidance
    - Board Charge: Develop a clear procedure that outlines the process by the ED, the President, the President-Elect, and the DRAMF to set the agenda for upcoming business meetings.
    - The Official Publication (OP) and the Procedures Manual (PM) lack specific guidance around setting the business meeting agenda.
    - The Annual and Midyear business meetings do not fall within either of the defined activities for Committee or Board meetings, in either the OP or the PM.
    - FASS and the ED have a good process in place, but need to memorialize it in the correct place for future reference, i.e. the PM.
    - Work Group established (Ashlee-Rose (lead), Austin/FASS, Kristen, Dave E., Leah)
    - Template developed as general meeting checklist that could be used for all meeting. Working on procedure.

- Timeline - Anticipate completion by Annual.
- Update: Ashlee-Rose Ferguson
  - Expanded to meeting planning for Annual and Midyear as well as Board meetings. Could be used for general meeting planning like training. Foundation is Chapter 3 which has been placed in an Excel spreadsheet and expanded. Working on timelines, meeting material preparation, etc. Meeting evaluation surveys used to inform meeting planning. Need to include FASS feedback. Use draft to do trial run at Midyear 2026.
  - Timing: complete Annual 2026

5. Clarifying roles/responsibilities for AAFCO Life Members (Appendix 1)
   - Board Charge: review Life Members voting rights
   - Carryover item from trade association meetings
     - Industry has concerns with life member voting since they are no longer representing a member agency or have state accountability.
     - Recent example (MBRC) of a life member casting a tie-break vote
     - The sentence in question:
       P.97 – Notification of New Life Members…… *"Life members have the right to vote in committee meetings and workgroups but not the association's general business meetings.*
   - Work Group established: (Erin (lead), Scott, Leah, Tim W., Mark)
   - Timeline - Complete
     - Update residual Action Items:
       - Life Members under contract should have non-disclosure clauses reviewed. (Austin) – *complete* (standardized contract now in use and has been reviewed). Share document from Austin.
       - Communicate to other Committees to identify Life Member ineligible to vote so they have quorum and count votes accordingly. (Dan King: President Elect/Committee Coordinator) – developed and part of this meeting Agenda (note print version has formatting/information errors). Dan will also share directly with Committee Chairs.

6. Laboratory Training Proposal Requests
   - Board Charge: Documents approved by Board and moved to SAC to include in the appropriate location within the Procedures Manual
   - Work Group established: (Linda (lead), Austin/FASS, Kristen)
   - Timeline - In progress, expect to complete spring 2025
   - Update: Linda
     - Organizational call recently. Form development in progress. Expect completion within 60 days.

7. New Business: Resolution Policy process review
   - Review timing to provide for Member input and with respect to amendments. Does not affect ability to propose amendments during the meeting. Use the 2025 Annual meeting as an example.
   - WG: Ashlee Rose, Dan K. (lead), Leah, Trish, Austin
   - Timing: Midyear 2026

Motion to accept August 6, 2025, SAC Annual meeting report - AR second - Scott. Motion carries.
Motion to Adjourn – Scott, second - Kristen. Motion carries.

Action Item Table:

Responsible	Item	Action	Timing / Status
WG: Linda, Kristen and Tim W.	Procedures Manual/By-Laws/Official Publication standardization	Update/clarify Procedures Manual including linkage with By-Laws and Official Publication. Preliminary review has been conducted. Returned to SAC work on edits. New WG.	Report Annual 2026
WG: Ashlee-Rose (co-lead), (Linda co-lead), Dan D., Tim W., Austin, Mark L.	Charitable Foundation	Review the proposal to establish a new AAFCO 501(c)3 charitable foundation	Paused.
WG: Ashlee-Rose, Austin/FASS, Kristen, Dave E., Leah	Business Meeting Guidance	Develop procedure outlining process to agenda for upcoming business meetings	Annual 2026
WG: Linda (lead), Austin/FASS, Kristen	Laboratory Training Proposal Requests	Identify appropriate location within the Procedures Manual	Fall 2025
Ashlee Rose, Dan K. (lead), Leah, Trish, Austin	Resolution Policy process review	Review with respect to member input/amendments during resolution development	Midyear 2026

ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS (AAFCO)
1800 SOUTH OAK STREET, SUITE 100
CHAMPAIGN, ILLINOIS

MINUTES OF THE PET FOOD COMMITTEE (PFC) ANNUAL MEETING
HELD AT THE HILTON OMAHA
1001 CASS STREET
OMAHA, NEBRASKA
AUGUST 5, 2025, 1:30 P.M. CT

MEMBERS:

Holly Jewell (Co-Chair)
Liz Beckman (Co-Chair; via teleconference)
Lorey Bell-Grady
Kelsi Brown
James Embry
Tiffany Leschishin
Kimberly Truett (via teleconference)
Kristen Green
Kristen Hamilton (via teleconference)
Jo Lynn Otero
Jennifer Roland
Barbara-Jean Schliecher
Katie Simpson
Charlotte Conway (via teleconference)
Karen Donnelly
George Ferguson
Justin Hill

ADVISORS:

Cathy Alinovi
Bill Bookout
Berit Foss
Jennifer Gornnert
Pam Kaufman
Chris Nash
Charles Starkey
Louise Calderwood
Angele Thompson
Pat Tovey

GUESTS:

Kathy Gross	Adjunct Professor, Kansas State University
Lori Goshert	Recording Secretary, Minutes Solutions (via teleconference)

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 1:30 p.m.

2. WELCOME AND ANNOUNCEMENTS

Holly Jewell and Liz Beckman welcomed attendees.

3. MICRO-ORGANISM/ENZYME LANGUAGE FOR PF5(A), (B)

On a motion made by Kristen Green, seconded by Tiffany Leschishin, it was resolved to accept the adjusted language for PF5(a) and (b), with the exact placement in the model bill to be discussed and voted on at a later date. Motion carried.

The Committee reviewed the adjusted language for PF5(a) and (b) regarding micro-organisms and enzymes. A reference to 4(g) was removed. There was a discussion regarding the options for placement.

Katie Simpson noted there are now two columns under nutrition facts labeled guarantee and household unit, and asked what the difference was between them. Angele Thompson responded that the amount in one column is CFU, and CFU/g in the other.

4. NUTRIENT PROFILE PLACEMENT DISCUSSION

On a motion made by Kristen Green, seconded by Jo Lynn Otero, it was resolved to place the information regarding nutrient profiles immediately before the headline reading "AAFCO Dog and Cat Food Nutrient Profiles – Introduction." Motion carried.

5. PURPOSE STATEMENT AS IT RELATES TO INGREDIENTS

On a motion made by Katie Simpson, seconded by Kristen Green, it was resolved to create a workgroup to investigate and draft options to specify how the life stage of a pet should be communicated on packaging for food containing ingredients approved only for certain life stages. Motion carried.

ACTION – Holly Jewell and Liz Beckman will send the proposal created by Pam Kaufman and Angele Thompson to the Committee for review.

Katie Simpson noted that the purpose statement was designed to clearly communicate the purpose of the product to the consumer on the principal display panel (PDP). The purpose statement was formerly referred to as the intended use statement. Some feed ingredients are only approved for use in adult life stages. If a treat, food, supplement, or food mixer contains an ingredient with a limited life stage, the limited life stage for the product must be clearly communicated in the purpose statement on the PDP.

Katie Simpson shared examples of ingredients only approved for adult pets. She proposed adding the following verbiage to Regulation PF4(a)(1):

- D. A life stage may be added before the species, e.g., "Adult Dog Treat."
- E. A life stage may be added before the species, e.g., "Adult Dog Food Supplement."
- F. A life stage may be added before the species, e.g., "Adult Dog Food Mixer."

It was noted that Item G already has language stating that a limited life stage may be indicated. This section contains verbatim statements for use on packaging. There was a discussion regarding the specificity of the life stage.

Angele Thompson noted that she, and Pam Kaufman had submitted a one-page proposal summarizing the issue, highlighting some obstacles, and providing guiding language, but they did not have time to circulate it.

See Appendix A and B.

6. PET FOOD LABEL MODERNIZATION (PFLM) UPDATE

6.1 State Survey

Jennifer Roland shared the results of the 2025 PFLM survey, noting that 44 out of 50 states had responded. A total of six states have adopted the rulemaking process, while 12 plan to do so in 2025 or 2026. To assist them, AAFCO can continue to provide guidance and updates on state strategies as well as training, education, and outreach. A total of 31 states reported seeing PFLM labels during the licensing and registration process, and all of these states are using enforcement discretion. Of the aforementioned 31 states, 19 reported seeing hybrid labels, and 13 of those have requested revisions.

Out of 18 laboratories, five analyze for total dietary fiber (TDF). Of those who answered "no," seven indicated that TDF is of interest to the regulatory program. Louise Calderwood provided the update on industry concerns.

Industry

Pat Tovey shared industry feedback to the PFLM implementation, noting that new labels are being used at the rate expected for the time period. The Pet Food Institute (PFI) hosted a series of six webinars that were well attended and currently available on the PFLM section of the PFI website. Other in-person events were well attended. There were discussions regarding how nutrition facts sections for pet food mirror that of human food. Veterinarians have asked why there are minimum and maximum numbers in nutrition facts sections rather than exact numbers, and this was explained. The Laboratory Methods and Service Committee is investigating concerns regarding testing measurements.

Industry professionals have raised concern that some states are experiencing difficulty in meeting the requirements for formal PFLM adoption. They are also concerned about the availability and variation of dietary fiber testing and states' sensitivity to the Pet Food Uniform Regulatory Reform Act regarding PFLM. There are bottlenecks related to TDF testing. A future bottleneck may be caused by printing capacity as more companies engage in label modernization.

7. NEW APPROACH TO COMBAT PET OBESITY

Dr. Kathy Gross shared a presentation called "Combating the Pet Obesity Epidemic with New Food Approaches and Ingredients." Approximately 61% of cats and 59% of dogs are obese, but most pet owners believe their pets are at a healthy weight. She shared a list of factors contributing to excess weight in pets and statistics for pet activity. While reducing food can reduce calories, it also reduces the daily intake of essential nutrients. AAFCO has an opportunity to create nutritional guidelines for reduced-calorie foods.

Kathy Gross shared ingredients that can be balanced to achieve lower calorie and fat levels, noting that one size does not fit all. She reported that excess body fat creates inflammation, which affects all body organs. Weight gain can also be exacerbated by metabolism changes as well as the gut biome, which is an emerging science.

A collective effort is needed to provide new approaches to combat obesity in pets. Those in the pet food industry should focus on nutritional design, ingredient selection, new ingredients, calorie calculations, and feeding guidelines. She noted that because most house pets are already overweight or at a high risk of becoming fat, pet food makers should shift their focus to make more products for obese-prone or overweight pets, ensure accurate calorie content on products, and adapt feeding guidelines to recommend lower calorie intake. Regulatory partners should add regulatory guidelines for weight-control pet foods, approve alternative metabolizable energy calculations, and prioritize new ingredient approvals.

8. HUMAN GRADE WORKGROUP

On a motion made by Kristen Green, seconded by Tiffany Leschishin, it was resolved to charge the Human Grade Workgroup to consider allowing additional third parties to substantiate human grade claims and equivalency within 21 CFR 117. Motion carried.

Holly Jewell noted that the Human Grade Workgroup was charged to refresh its membership, establish a FAQ page dedicated to human-grade pet food claims, develop training materials for the USDA's AMS auditors, and establish a human-grade FAQ workgroup.

The Workgroup requested a charge from the Pet Food Committee to edit the human-grade guidelines to consider allowing additional third parties to substantiate human-grade claims and equivalency within 21 CFR 117.

It was noted that the charge is vague and the phrase “third parties” may need expanding. It was suggested that “to edit the human grade guidelines” be removed from the charge, as edits would need to be discussed by the full Committee. Identifying potential third parties would be the first step. It was noted that some ingredients used in pet food do not have a human grade.

9. TRAINING AND OUTREACH SUBCOMMITTEE

9.1 Regulator/Industry Work Group

This item was not discussed.

9.2 Consumer/Veterinary/Retailer Work Group

This item was not discussed.

9.3 Training and Outreach Events

This item was not discussed.

9.4 Pet Food Forum

This item was not discussed.

9.5 2025 Annual Pet Food Workshop

Tiffany Leschishin reported that registration is open online for the AAFCO and NASC Pet and Specialty Pet Food Labeling Workshop scheduled for August 6 and 7, 2025, in Omaha.

10. OTHER TOPICS FOR DISCUSSION/NEW BUSINESS

There were no other topics for discussion or new business.

11. ADJOURNMENT

On a motion made by Katie Simpson and carried, it was agreed that there was no further business to transact; the meeting closed at 3:09 p.m.

DISCLAIMER

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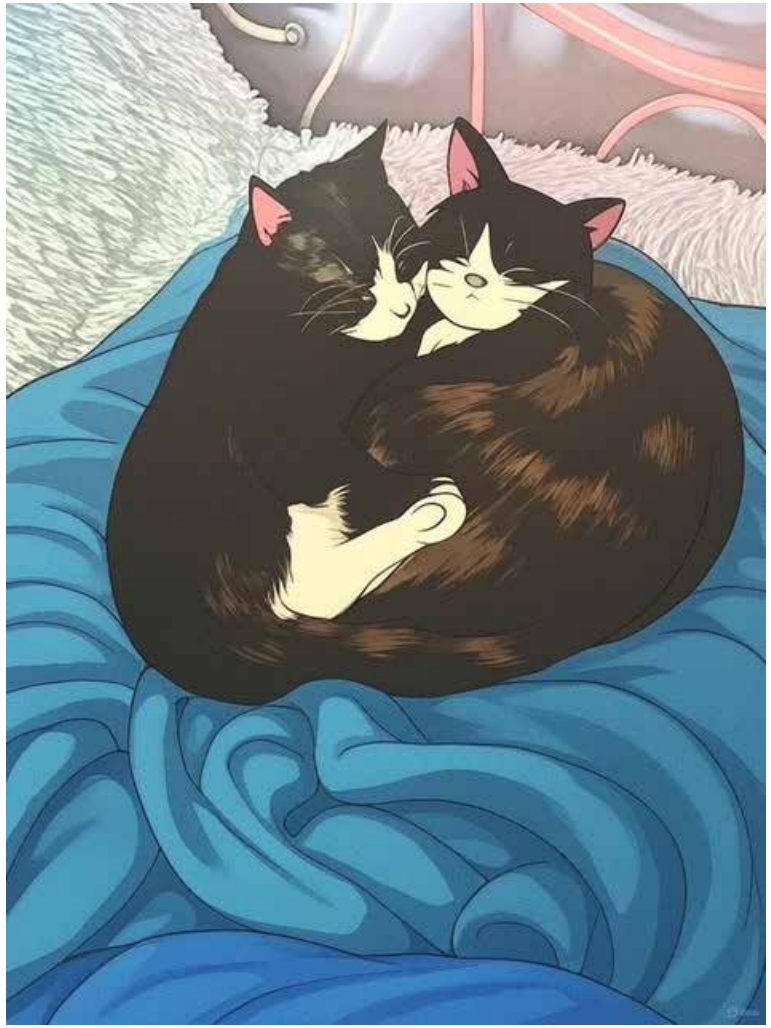
Director	Director
Date	Date

Appendix A

Pet and Specialty Pet Purpose Statement

Regulation PF4

The Purpose Statement was designed to clearly communicate the purpose of the product to the consumer on the principal display panel (PDP)

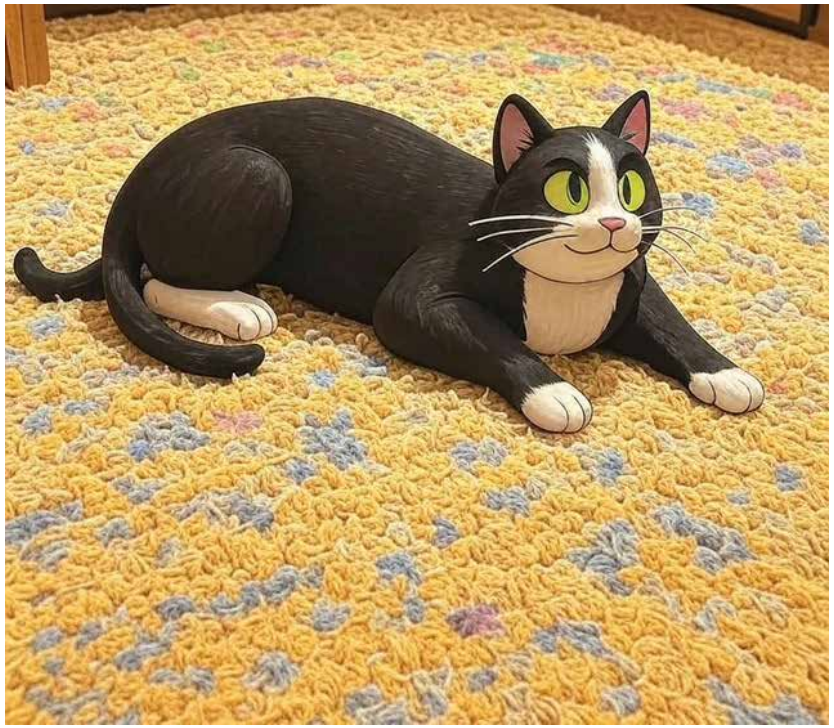


Pet and Specialty Pet Purpose Statement

Some feed ingredients are only approved for use in adult life stages.

If a treat, food supplement, or food mixer contains an ingredient with a limited life stage, the limited life stage for the product must be able to be clearly communicated in the Purpose Statement on the PDP.

Pet and Specialty Pet Purpose Statement



Current ingredient examples with limited life stage:

33.29 Black Soldier Fly Larvae Oil – adult dog

T33.29 Black Soldier Fly Larvae Oil – adult dog and adult cat food

60.117 Dried Black Soldier Fly Larvae – adult dog

101.30 Krill Meal – adult dog

T60.121 Dried Mealworm Meal – adult dog

Pet and Specialty Pet Purpose Statement

Propose adding the following verbiage to Regulation PF4(a)(1)

D. A life stage may be added before the species, e.g. “Adult Dog Treat”

E. A life stage may be added before the species, e.g. “Adult Dog Food Supplement”

F. A life stage may be added before the species, e.g. “Adult Dog Food Mixer”

Appendix B

PF4 Purpose Statements and Ingredient Definitions with Use Restrictions

There are some questions regarding the purpose statement on a product that includes ingredients with definitions that include use restrictions. For example, black soldier fly larvae is currently allowed in adult dog food and soon will be allowed in adult cat foods. The limited verbatim statements provide clarity for the consumer. There are 7 basic options, each have a species component along with an indicator of nutritional adequacy. Six of the seven basic options are quite short and simple. The one complex option is the 'qualified' complete food option. For this option, there are two wordings and there are 4 life stage variables.

Current list:

- Complete _____ Food, blank is species
- Complete Food for _(life stage) (Species) __ or Complete _(life stage) (Species) Food
    - Adult
    - Puppies or Kittens or Juvenile
    - Puppies (< 70 lb as an adult)
    - Dogs (except puppies >70lb as an adult)
- Veterinary Diet for (species),
- (species) _ Treat,
- (Species) _ Food Supplement,
- (species)__ Food Mixer,
- Daily _(specialty pet species) Food

Some ingredient definitions include use restrictions that specify not only a species but may also specify a life stage/class. Two recent examples are black soldier fly larvae (BSFL) which is limited to adult dog food. There is an addition pending of 'and in adult cat food.' A second example is L-carnitine, where the restrictions are more complex. The use list includes not only species but also levels.

The purpose statements, other than for complete foods, do not include indications of life stage. This would seem to set up a possible scenario where an ingredient definition might have a use restriction that would then not be indicated in the purpose statement. Of main concern are treats, food mixers and food supplements that might include ingredients which have use restrictions.

Industry is suggesting that the easiest way to address this would be to have AAFCO consider leaving the purpose statement stand as they are currently written. **When a product includes an ingredient with a use restriction, the principal display panel must state the restriction life stage, outside of the purpose statement, in type "at least as large as" the purpose statement.**