IDC Committee Report
2026 New Orleans, LA
January 20th
2:15 Central Time

Committee Recommendations:

40.114 Pomegranate Pomace

New official definition, to replace the tentative definition

40.114 Pomegranate Pomace is the residue from the normal processing of pomegranates for human consumption. This residue shall be suitable for animal food usage and may contain the skin, peel, seed, and pulp of the fruit. It must contain not less than 40% total dietary fiber (dry matter basis) and be dried to contain no more than 10% moisture. It is for use in dog food as a source of dietary fiber consistent with good feeding practices.

33.29 (D) Black Soldier Fly Larvae Oil

New official definition, to replace the tentative definition

33.29 Black Soldier Fly Larvae Oil is the product obtained by mechanically extracting the oil from dried larvae of Black Soldier Fly, Hermetia illucens, that have been raised on feedstock composed exclusively of feed grade materials. It is intended for use in poultry, swine and aquaculture feed, and adult dog and adult cat food as a source of energy consistent with good feeding practices. It consists predominantly of glyceride esters of fatty acids and contains no additions of free fatty acids or other materials obtained from fats. It must contain, and be guaranteed for, not less than 90% total fatty acids, no more than 2% unsaponifiable matter and not more than 1% insoluble impurities. Maximum free fatty acids and moisture must also be guaranteed. If an antioxidant(s) is used, the common name or names must be indicated, followed by the words “used as a preservative.”

60.117(A) Dried Black Soldier Fly Larvae

New official definition, to replace the tentative definition

60.117 Dried Black Soldier Fly Larvae** is the dried larvae of the Black Soldier Fly, Hermetia illucens, with or without mechanical extraction of part of the oil, that has been raised on feedstock composed exclusively of feed grade materials. The ingredient must be labeled with guarantees for minimum crude protein and minimum crude fat on an as-fed basis. If oil is mechanically extracted, maximum crude fat must also be guaranteed on the ingredient label. The ingredient is dried by artificial means to no more than 10% moisture. It is for use in

aquaculture, poultry, and swine feed, and in adult dog food and adult cat food as a source of protein and fat consistent with good feeding practices.

71.30 Mustard Meal, Solvent Extracted

The edited definition with the CORRECTION to the proposed and adopted dates:

71.30 Mustard Meal, Solvent Extracted,** is the product obtained by grinding the cake that remains after removal of some of the oil by mechanical extraction, and removing most of the remaining oil by solvent extraction. It is obtained from the seed of the cultivated mustard plants Brassica juncea, Brassica nigra, and Sinapis alba (formerly Brassica alba). Use should be restricted to cattle and sheep and at no more than 10% of the ration. It should not be fed to lactating dairy cows if milk production is for human consumption because of objectionable taste and/or odor. **(Proposed 1972, Adopted 1973, Amended 2017).**

Editorial change- does not need Member Vote.

Note to the Board: This definition was originally proposed in 1972 and adopted in 1973. The amendment in 2017 added genus and species to the definition. This correction is necessary in the OP.

AGRN 73 – Xylooligosaccharides

Addition of AGRN 73 (Xylooligosaccharides) to Section 101 GRAS, Table 101.1 of the AAFCO Official Publication (OP).

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
73	Rayonier Advanced Materials, Inc.	Xylooligosaccharides	Xylooligosaccharides	Utility information not evaluated for GRAS, see FDA's letter for more information	Swine, poultry and fish	10/2/2024	FDA has no questions. (PDF – 3 pages)

AGRN 74 – Lytic Bacteriophage Preparation

Addition of AGRN 74 (Lytic Bacteriophage Preparation) to Section 101 GRAS, Table 101.1 of the AAFCO Official Publication (OP).

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
74	Intralytix, Inc.	Lytic Bacteriophage Preparation	Lytic Bacteriophage Preparation	To be used as a processing aid to help control *Salmonella enterica* in pet food and ingredients for use in pet food at a use rate of 1 X 10^8 plaque-forming units/gram (PFU/g).	Pets	1/17/2025	FDA has no questions. (PDF – 3 pages)

AGRN 75 – Tagetes (Aztec marigold) Extract

Addition of AGRN 75 (Tagetes (Aztec marigold) Extract) to Section 101 GRAS, Table 101.1 of the AAFCO Official Publication (OP).

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
75	Royal Canin U.S. Inc.	Tagetes (Aztec marigold) Extract	Tagetes (Aztec Marigold) extract	Utility information not evaluated for GRAS, see FDA's letter for more information	Dogs and cats	2/13/2025	FDA has no questions (PDF – 3 pages)

AGRN 64 – Dried L-Tryptophan Fermentation Product

Editorial change to AGRN 64 (Dried L-Tryptophan Fermentation Product) in Section 101 GRAS, Table 101.1 of the AAFCO Official Publication (OP).

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
64 (PDF - 1386 pages)	CJ CheilJedang Corporation	Dried L-Tryptophan Fermentation Product	Dried L-Tryptophan Fermentation Product	For use as a source of L-Tryptophan in swine feed	Swine	11/30/23	FDA has no questions (PDF – 3 pages)

*Editorial change- does not need Member Vote. Include link for 64 to reference the redacted AGRN notice

75.11 Rice protein concentrate

New official definition

75.11 Rice protein concentrate is the dried protein fraction of the endosperm of the rice grain (Oryza sativa). It is obtained during rice starch production by wet milling under alkaline conditions, sieving, separation, precipitation under acidic conditions, and drying. It must contain not less than 70% protein on a dry matter basis and not more than 12% moisture. If a conditioning agent is used, the name of the conditioning agent must be shown as an added ingredient. It is for use in dog and cat foods as a source of protein in accordance with good feeding practices. (AFIC 2026)

48.89 Corn Protein Concentrate

Addition of definition 48.89 Corn Protein Concentrate to the **Collective Term 22.4 Plant Protein Products.**

36.14 Direct Fed Microorganisms: (Lactobacillus buchneri/Lentilactobacillus buchneri)

The revised Section 36.14 text reads:

Lactobacillus buchneri named to Lentilactobacillus buchneri (cattle only) **

Add an additional footnote: **Date of compliance January 2028.

Editorial change and does not need membership vote.

Section 57: Mineral Products – Ca/P Recommended Footnote Regarding Cat Food Products

Addition of the footnote regarding select Phosphorus containing minerals to Section 57. Mineral Products of the AAFCO Official Publication (OP).

Add footnote *"(+) Phosphorus from this, and similarly marked minerals, should be limited to a combined total of < 1 gram phosphorus per 1000 kcal ME in complete cat food products. (2026)"*

The footnote would apply to the following ingredients, which are P-containing minerals that are > 80% soluble in water after 1 minute of exposure, and be marked with (+): *Disodium Phosphate; Monosodium Phosphate; Phosphoric Acid; Sodium Hexametaphosphate; Sodium Tripolyphosphate; Tribasic Sodium Phosphate; Sodium Acid Pyrophosphate.*

Common Food Index:
Accept Jerusalem Artichoke into the CFI.
This is an editorial change to the CFI list on the AAFCO website. Does not need membership vote

FASS ACTIONS:

1. **Make all editorial changes (marked in red) to newest version of the OP or AAFCO website.**
2. **Upload Minutes and Attachments A, B, C and D to the Ingredient Definitions Committee Page**

Board Recommendations:

Committee Minutes: including motions
See Attachment A, Minutes As Accepted
Attachment B, CFI Recommendations and Report
Attachment C, Protein Products Work Group Report
Attachment D, Enzyme Marketing Work Group Report

Attachment A (Approved 3/5/2026)

MINUTES OF THE INGREDIENT DEFINITIONS COMMITTEE MIDYEAR MEETING
HELD AT THE NEW ORLEANS MARRIOTT HOTEL
555 EAST CANAL STREET
NEW ORLEANS, LOUISIANA
JANUARY 20, 2026, 2:15 P.M. CT

MEMBERS PRESENT:

David Snell, Co-Chair
Erin Bubb, Chair
Alan Keller
Ali Kashani
Ashlee-Rose Ferguson
Ashley Shaw
Brittany Clark
Charlotte Conway
Dan King
Ely Walker
Falina Hutchinson
Laura Scott
James Embry
Jo Lynn Otero
Jordan Johnston
Justin Hill
Katie Simpson
Marissa Kost
Mark LeBlanc
Nathan Price
Shannon Jordre
Trish Dunn
KC Gutenberger

ADVISORS PRESENT:

Cathy Alinovi
Amy Tryon
Andrew Bish
Bill Bookout
Charles Starkey
Emily Helmes
Jillian Nash
Kristi Smedley
Leah Wilkinson
Leanne Myer
Patrick Fulling
Renee Streeter
Sarah Hubert

MEMBERS ABSENT:

Bailey Whiten
Bernadette Mundo
Kimberly Truett
Stan Cook
Ken Bowers

GUESTS:

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 2:18 p.m.

2. WELCOME AND OPENING REMARKS

Chair Erin Bubb welcomed the attendees to the meeting.

3. NEW DEFINITIONS AND EDITORIAL CHANGES FOR THE AAFCO OP

Erin Bubb noted that there are a few remaining tentative definitions that require replacement with new official definitions. She reminded participants that the tentative status is discontinued for future use, due to recent bylaw changes.

3.1 40.114 Pomegranate Pomace

On a motion made by Trish Dunn, seconded by Alan Keller, it was resolved to accept the addition of the official definition 40.114 Pomegranate Pomace to the AAFCO Official Publication (OP). Motion carried.

The new official definition, to replace the tentative definition, reads:

40.114 Pomegranate Pomace is the residue from the normal processing of pomegranates for human consumption. This residue shall be suitable for animal food usage and may contain the skin, peel, seed, and pulp of the fruit. It must contain not less than 40% total dietary fiber (dry matter basis) and be dried to contain no more than 10% moisture. It is for use in dog food as a source of dietary fiber consistent with good feeding practices.

3.2 33.29 (D) Black Soldier Fly Larvae Oil

On a motion made by Falina Hutchinson, seconded by Trish Dunn, it was resolved to accept the addition of the official definition 33.29(D) Black Soldier Fly Larvae Oil to the AAFCO Official Publication (OP). Motion carried.

In the new definition, "finfish" was replaced with "aquaculture." The new official definition, to replace the tentative definition, reads:

33.29 Black Soldier Fly Larvae Oil is the product obtained by mechanically extracting the oil from dried larvae of Black Soldier Fly, Hermetia illucens, that have been raised on feedstock composed exclusively of feed grade materials. It is intended for use in poultry, swine and aquaculture feed, and adult dog and adult cat food as a source of energy consistent with good feeding practices. It consists predominantly of glyceride esters of fatty acids and contains no additions of free fatty acids or other materials obtained from fats. It must contain, and be guaranteed for, not less than 90% total fatty acids, no more than 2% unsaponifiable matter and not more than 1% insoluble impurities. Maximum free fatty acids and moisture must also be guaranteed. If an antioxidant(s) is used, the common name or names must be indicated, followed by the words "used as a preservative."

3.3 60.117(A) Dried Black Soldier Fly Larvae

On a motion made by Mark LeBlanc, seconded by Justin Hill, it was resolved to accept the addition of the official definition 60.117(A) Dried Black Soldier Fly Larvae to the AAFCO Official Publication (OP). Motion carried.

In the new definition, "finfish" was replaced with "aquaculture." The new official definition, to replace the tentative definition, reads:

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

3.4 71.30 Mustard Meal, Solvent Extracted

On a motion made by Falina Hutchinson, seconded by Ely Walker, it was resolved to accept the editorial change to definition 71.30 Mustard Meal, Solvent Extracted. Motion carried.

The definition with the editorial change to the proposed and adopted dates reads:

*71.30 Mustard Meal, Solvent Extracted,** is the product obtained by grinding the cake that remains after removal of some of the oil by mechanical extraction, and removing most of the remaining oil by solvent extraction. It is obtained from the seed of the cultivated mustard plants Brassica juncea, Brassica nigra, and Sinapis alba (formerly Brassica alba). Use should be restricted to cattle and sheep and at no more than 10% of the ration. It should not be fed to lactating dairy cows if milk production is for human consumption because of objectionable taste and/or odor. (Proposed 1972, Adopted 1973, Amended 2017).*

This definition was originally proposed in 1972 and adopted in 1973. The amendment in 2017 added genus and species to the definition.

3.5 AGRN 73 – Xylooligosaccharides

On a motion made by Nathan Price, seconded by Falina Hutchinson, it was resolved to accept the addition of AGRN 73 (Xylooligosaccharides) to Section 101 GRAS, Table 101.1 of the AAFCO Official Publication (OP). Motion carried.

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
73	Rayonier Advanced Materials, Inc.	Xylooligosaccharides	Xylooligosaccharides	Utility information not evaluated for GRAS, see FDA's letter for more information	Swine, poultry and fish	10/2/2024	FDA has no questions. (PDF – 3 pages)

3.6 AGRN 74 – Lytic Bacteriophage Preparation

On a motion made by Nathan Price, seconded by Ely Walker, it was resolved to accept the addition of AGRN 74 (Lytic Bacteriophage Preparation) to Section 101 GRAS, Table 101.1 of the AAFCO Official Publication (OP). Motion carried.

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
74	Intralytix, Inc.	Lytic Bacteriophage Preparation	Lytic Bacteriophage Preparation	To be used as a processing aid to help control *Salmonella enterica* in pet food and ingredients for use in pet food at a use rate of 1 X 10^8 plaque-forming units/gram (PFU/g).	Pets	1/17/2025	FDA has no questions. (PDF – 3 pages)

3.7 AGRN 75 – Tagetes (Aztec marigold) Extract

On a motion made by Nathan Price, seconded by Trish Dunn, it was resolved to accept the addition of AGRN 75 (Tagetes (Aztec marigold) Extract) to Section 101 GRAS, Table 101.1 of the AAFCO Official Publication (OP). Motion carried.

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
75	Royal Canin U.S. Inc.	Tagetes (Aztec marigold) Extract	Tagetes (Aztec Marigold) extract	Utility information not evaluated for GRAS, see FDA's letter for more information	Dogs and cats	2/13/2025	FDA has no questions (PDF – 3 pages)

3.8 AGRN 64 – Dried L-Tryptophan Fermentation Product

On a motion made by Nathan Price, seconded by Falina Hutchinson, it was resolved to accept the editorial change to AGRN 64 (Dried L-Tryptophan Fermentation Product) in Section 101 GRAS, Table 101 of the AAFCO Official Publication (OP). Motion carried.

AGRN (select for detailed record)	Notifier	Substance	Common or Usual Name	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
64 (PDF - 1386 pages)	CJ CheilJedang Corporation	Dried L-Tryptophan Fermentation Product	Dried L-Tryptophan Fermentation Product	For use as a source of L-Tryptophan in swine feed	Swine	11/30/23	FDA has no questions (PDF – 3 pages)

3.9 75.11 Rice protein concentrate

On a motion made by Dan King, seconded by Alan Keller, it was resolved to accept the addition of the official definition 75.11 Rice Protein Concentrate to the AAFCO Official Publication (OP). Motion carried.

75.11 Rice protein concentrate is the dried protein fraction of the endosperm of the rice grain (Oryza sativa). It is obtained during rice starch production by wet milling under alkaline conditions, sieving, separation, precipitation under acidic conditions, and drying. It must contain not less than 70% protein on a dry matter basis and not more than 12% moisture. If a conditioning agent is used, the name of the conditioning agent must be shown as an added ingredient. It is for use in dog and cat foods as a source of protein in accordance with good feeding practices. (AFIC 2026)

The Committee agreed that any ingredients arising from the AFIC process will be voted on in each meeting and designated by "(AFIC Year)" to signify the ingredient originated Animal Food Ingredient Consultation process through CVM.

3.10 48.89 Corn Protein Concentrate

On a motion made by Falina Hutchinson, seconded by Brittany Clark, it was resolved to accept the addition of definition 48.89 Corn Protein Concentrate to the Collective Term 22.4 Plant Protein Products. Motion carried.

3.11 Fermentation Products: 36.14 (Lactobacillus buchneri/Lentilactobacillus buchneri)

On a motion made by Marissa Kost, seconded by Mark LeBlanc, it was resolved to accept the editorial change to 36.14 Lactobacillus buchneri Direct-Fed Microorganisms in the AAFCO Official Publication (OP). Motion carried.

The revised Section 36.14 text reads:

Lactobacillus buchneri named to Lentilactobacillus buchneri (cattle only) **

**Date of compliance January 2028.

3.12 Section 57: Mineral Products – Ca/P Recommended Footnote Regarding Cat Food Products

On a motion made by David Snell, seconded by Katie Simpson, it was resolved to accept the addition of the footnote regarding select Phosphorus containing minerals to Section 57. Mineral Products of the AAFCO Official Publication (OP). Motion carried.

Based on the Ca/P expert panel report, the Pet Food Committee recommended that the IDC add the following footnote to Section 57. Mineral Products:

"+ Phosphorus from this, and similarly marked minerals, should be limited to a combined total of < 1 gram phosphorus per 1000 kcal ME in complete cat food products. (2026)"

The footnote would apply to the following ingredients, which are P-containing minerals that are > 80% soluble in water after 1 minute of exposure, and be marked with (+): *Disodium Phosphate; Monosodium Phosphate; Phosphoric Acid; Sodium Hexametaphosphate; Sodium Tripolyphosphate; Tribasic Sodium Phosphate; Sodium Acid Pyrophosphate.*

This item is not an editorial change and will proceed for membership vote.

3.13 The Committee noted that the notation + is used to avoid confusion, as * and ** are already in use to signify other compliance needs.

4. WORK GROUPS UPDATE

4.1 Animal Protein Work Group

On a motion made by Falina Hutchinson, seconded by Trish Dunn, it was resolved to accept the report from the Animal Protein work group. Motion carried.

Charles Starkey noted that the group's priority was to propose edits to current 'Meat Meal' and 'Meat and Bone Meal' definitions to reflect the current trend of lower phosphorus level in monogastric species due to the use of phytase in the manufacturing processes. The work group requested feedback on label requirements including whether to incorporate a maximum ash content for meat meal and a minimum ash content for meat and bone meal.

The work group's proposed definitions will be presented for consideration during the spring IDC meeting.

4.2 DFM Nomenclature Work Group

ACTION – Marissa Kost is to investigate whether the nomenclature for 36.11 must be updated (as it was for 36.14) and report back at the next IDC meeting.

There was no work group report. Marissa Kost noted that she has been in discussion with Mark Skasko (FDA) to get up to speed. They plan to convene the larger work group within the next month, and the group's initial priority will be to provide guidance to Industry on nomenclature change processes.

4.3 Enzyme Marketing Coordination (EMC) Work Group

On a motion made by Ely Walker, seconded by Jo Lynn Otero, it was resolved to accept the report from the Enzyme Marketing Coordination work group. Motion carried.

Marissa Kost reported that the group met to discuss labeling issues in the Enzyme Marketing Coordination document within the AAFCO Official Publication and leveraged ETA input to clarify product label, add label missing elements, and update literature references.

The work group noted the need to clarify how to interpret enzyme activity units and guarantee requirements throughout the OP. It recommended the establishment of a new work group, with representation from the Model Bill and Regulations Committee, Animal Feed Committee, and Pet Food Committee, to review and update enzyme guarantee sections where applicable in the OP and guidance material, for additional clarity and consistency. Some members of the current EMC work group were willing to participate, but additional SMEs are required.

The IDC will review the report's recommendations and address during its next meeting, to be held virtually in the spring.

4.4 Feed Terms Work Group

Erin Bubb and David Snell noted that the Feed Terms group is an informal, quasi-work group headed by Ali Kashani (the feed terms investigator), in consultation with other participants ad hoc. Ali Kashani added that the group does not hold formal, recurring meetings, but rather exchanges ideas and working

documents through Basecamp. He encouraged those interested in participating or sharing feedback to contact him directly.

Ali Kashani shared the group's current drafts for two feed terms: High Pressure Processing (Process) and Gently Cooked (Process). Erin Bubb clarified that AAFCO approves official definitions and official terms, with the goal being to foster uniform interpretation across stakeholder groups. Enforceability varies, as Shannon Jordre (FDA) noted that the official feed terms are typically not specific enough to be enforceable federally, while multiple state-level regulators commented that most states recognize AAFCO's official feed terms and they are enforceable when used in a product label.

DRAFT- High Pressure Processing

Ali Kashani shared an early draft of the feed term, High Pressure Processing, and requested additional input from stakeholders. The group considered whether to include "pasteurization," "non-thermal," and the AKA parenthetical, as well as how best to simplify the concept of vegetative cells. Ali Kashani noted that the FDA recommended using the term "processing" rather than "pasteurization," because HPP does not kill spores. He acknowledged feedback that consumers currently (albeit incorrectly) use "pasteurization."

Erin Bubb clarified that the reference to "cold press" in this definition is unrelated to the cold press extraction technique referenced in other definitions. This was cited as an example as to why "cold press" should not be used in this definition as an alternate name. It was also stated that multiple names for one process are discouraged and should be limited to one official feed term.

DRAFT- Gently Cooked

Amy Tryon questioned the utility of the feed term, suggesting that "gently" was a descriptor for the already defined "cooked" process, and that the term may not meet the IDC's criteria for definition and could set the precedent for the Committee to define an unreasonable number of qualifiers in the future. Ali Kashani clarified that the need for an official term arose from regulators who had observed more frequent use of the term in Industry and requested official clarity for both the regulators and consumers. Multiple state regulators added that defining the term would help drive consistency in label review and approval processes within and across states and would aid consumer understanding of packaging language and claims.

5. NEW BUSINESS

5.1 Pomegranate Pomace Investigator Report Correction

Erin Bubb noted that the investigator report for Pomegranate Pomace incorrectly referenced the new ingredient as "T40.113" instead of "T40.114." The revision to T40.114 was made in the 2026 OP.

5.2 Correcting the Order of Required Guarantees Listed in Ingredient Definitions

Some ingredient definitions include required guarantees on single ingredient labels. Required guarantees listed in the definition are often listed in the wrong order according to the MODEL REGULATIONS (e.g., monocalcium phosphate), and regulators report seeing the guarantees listed in the wrong order on labels.

Richard Ten Eyck will explore whether Ava AI can complete these editorial changes, in lieu of enlisting a work group.

5.3 CFI Subcommittee

CFI Subcommittee Report

On a motion made by Falina Hutchinson and seconded by Trish Dunn, it was resolved to accept the CFI Subcommittee Report. Motion carried.

George Ferguson (CFI Coordinator) presented the report from the CFI meeting held on November 12, 2025. He reported that Ken Bowers replaced Kent Kitade on the CFI Subcommittee. The Subcommittee recommended one item (Jerusalem artichoke) for the IDC's consideration. All items from the submission cycle and the determinations will be attached to these IDC meeting minutes.

George Ferguson noted that an ingredient may not be included in the CFI due to invalid or insufficient submissions. Exclusion alone does not signal that an ingredient is prohibited.

5.3.1 Proposal to Add Jerusalem Artichoke the CFI – Open Discussion

On a motion made by Trish Dunn and seconded by Dan King, it was resolved to accept Jerusalem Artichoke (CFI_1154) into the CFI. Motion carried.

Jerusalem artichoke, also known as sunchoke, is a native, North American root vegetable. It was previously included in the inulin ingredient definition in the OP, since Jerusalem artichoke can be used as an inulin source. The current proposal considers inclusion of Jerusalem artichoke as a whole food in the CFI.

Bill Bookout expressed concerns regarding potential scope creep, suggesting that including items such as Jerusalem artichoke in the CFI deviates from the index's original intent and the common food official definition. He questioned whether Jerusalem artichoke could be considered "commercially available", as he could not find it in popular grocery stores, and asserted that inclusion of unqualified foods in the CFI could create confusion and lead to further inconsistency across the industry.

Participants weighed informal criteria for common food, including common marketplace availability, production volume, and safety implications. However, it was noted that "common food" is an official term with a full definition, published in the OP, that should guide collective interpretation. Erin Bubb added that grocery sale for human consumption is not a requirement in the official definition of common food.

Dave Edwards (FDA Center for Veterinary Medicine (CVM)), commented that common foods are not defined ingredients, when the FDA's looks at common foods they consider obvious safety implications for animal feed. He stated that the FDA found no safety issues with Jerusalem artichoke and would accept its listing as a common food. Multiple participants commented that, although less common in human food, Jerusalem artichoke has been produced at scale and used in animal feed for years.

Bill Bookout questioned the transparency of the CFI review process and requested that the CFI worksheet and/or submission rationale be shared for all CFI submissions to facilitate more thoughtful review and input.

George Ferguson outlined efforts to maintain transparency and inclusion throughout the CFI process, including standardized submission and approval workflows, a public comment period, subcommittee member review and vote for IDC recommendation, open forum discussion during IDC meetings, and IDC member vote. He expressed openness to a discussion on modifying CFI procedures (i.e., distributed materials). George Ferguson encouraged all stakeholders to share their views freely during open forums and voting members to vote according to their wishes.

6. NEXT MEETING

The next meeting will be scheduled virtually in early April 2026.

7. COLLAGEN DISCUSSION PANEL

Austin Therrell moderated a collagen discussion panel, comprised of Charles Starkey (North American Rendering Association), Charlotte Conway (FDA), Bill Bookout (National Animal Supplement Council), David Snell (IDC Co-Chair), and Erin Bubb (IDC Co-Chair).

Charles Starkey presented an overview of collagen and its derivative, gelatin. There are up to 28 types of collagens and they produce varying levels of amino acids across species. Collagen is most often discussed in medical contexts, as there are many genetic disorders related to collagen and much interest around the potential health effects of collagen on joints and aging. Collagen is converted into gelatin through a process called hydrolysis. Gelatin is translucent, colorless, and commonly used for stabilizers, vaccines, and gelatine capsules. It is a collection of peptides and proteins which vary, depending on original tissue source, and cannot be absorbed directly into the gut.

Collagen is not a defined or approved ingredient for use in animal food. The Animal Protein Work Group has been working to define collagen and gelatin, which is especially complicated because of the various types, sources, and compositions.

Charlotte Conway shared that collagen is primarily used in diets to target generalized aging and osteoarthritis among middle-aged women, pets, and horses. Bill Bookout echoed these observations and shared his family's experience with medically recommended use of collagen for restorative osteological effects. Nonetheless, variation in type and processing affects whether it can provide meaningfully bioavailable protein.

Charles Starkey noted that collagen has poor digestibility and intestinal absorbability. However, it is possible for dietary collagen to have a physiological effect in animals through the breakdown and supply of amino acids such as glycine, which can be used by the liver (or localized tissue, if injected) to build up hydroxyproline and hydroxylysine to restore and lubricate joints.

Charlotte Conway added that there is less general interest in collagen as a protein source or nutrient, which may impede approval of its definition. She added that the FDA Center for Veterinary Medicine would typically look for the National Research Council (NRC) or another consensus-building body to recognize collagen as a nutrient, for the regulatory body to recognize it as such and act on it. To this end, she reported growing scientific draw to classify collagen as a nutrient at certain life stages. She added that while it is not approved as an isolated process and defined as ingredient for animal feed, there are other approved ingredients that contain collagen. Additionally, businesses may have drafted a GRAS self-conclusion for use of collagen in animal food, which local regulators should consider and evaluate where applicable.

Erin Bubb and David Snell summarized the extensive complexity that makes official definition difficult, including the compounding variations and lack of standards and methods to evaluate claims. Charles Starkey noted that if there is desire for collagen to become a defined ingredient, the Animal Protein Work Group strongly requests a company to step forward to advocate and support its development by addressing investigator questions.

Austin Therrell encouraged participants who are interested in the discussion to reach out to Charles Starkey.

8. ADJOURNMENT

The meeting concluded at 4:55 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.

Attachment B Common Food Index Report

Committee Report
CFI Subcommittee (IDC), Biannual Recommendation Review November 12, 2025, Virtual

Subcommittee Recommendations
The Subcommittee Recommends that the IDC accept their recommendations as noted in the attached document titled “CFI SC Determinations Midyear 2026.pdf”. These recommendations are comprised of those proposed food items submitted for inclusion in the common food index prior to September 1, 2025.

Subcommittee Participants
Virtual Attendees:
George Ferguson (CFI Project Coordinator) JoLynn Otero (NM)
Katie Simpson (IN)
Ken Bowers (KS Life Member)
Vote by Proxy:
James Embry (TX)
Subcommittee Report
Subcommittee Activities
The Common Food Index Subcommittee (CFI SC) was called to order by George Ferguson at 11am EST on November 12, 2025, with 3 members present virtually and one member having submitted his voting preferences via email to George Ferguson prior to the CFI SC meeting.
The subcommittee reviewed the public comments for submissions they had deemed to meet the criteria of a common food to aid them in determining their suitability for recommendation to the IDC to be added to the CFI. Two food items, Jerusalem Artichoke and Heavy Cream, had been previously determined to meet the “Common Food” term and were posted for public comment for a period of 30 days.
After considering the public comments a vote was held for each item that allowed for additional discussion by SC members.
The CFI SC members voted 4 aye & 0 nay to recommend Jerusalem Artichoke and voted 0 aye & 4 nay to recommend Heavy Cream.

The CFI SC was adjorned by George Ferguson at 12:54pm EST on November 12, 2025.

The attached report titled “CFI SC Determinations Midyear 2026.pdf” contains the subcommittee’s recommendations for proposed food items submitted for inclusion in the common food index prior to September 1, 2025, as required per the CFI procedures.

Those food items submitted for consideration that were ultimately determined by the CFI SC to Not Meet the AAFCO feed term “Common Food” have also been included in the attached document titled “CFI SC Determinations Midyear 2026.pdf”, along with an explanation on criteria not met, as required by the CFI Procedures.
Attachments:
CFI SC Determinations Midyear 2026.

CFI SC Determinations Midyear 2026

CFI SubCommittee Determinations Midyear 2026 Recommended

CFI_1154 Jerusalem Artichoke Recommended

CFI SubCommittee Determinations Midyear 2026 Not Recommended

CFI_1155 Heavy Cream Not Recommended

Upon review of the public comments provided to the subcommittee, they agreed with the majority of commenters that the submitted food item was a fraction of a whole food rather than a whole food. To be considered for inclusion in the common food index, the food item should be a Whole common food and not a derivative/fraction thereof.

CFI SubCommittee Determinations Midyear 2026 Does Not Meet

CFI_ID Name of Ingredient: Status Reason For Decline

- Coffee Chaff Does Not Meet

The submitted ingredient is not a whole food, but rather a fraction/by-product of another food. Additionally, the committee was unable to identify any common use of the product currently existing.

- Flaxseed Peel Does Not Meet

The product submitted for consideration does not meet the definition of a common food, in that it is not whole, but rather a fraction of the whole product. Additionally, the AAFCO OP already defines flaxseed screenings under definition 71.2.

- Mushrooms that could be added to have my dog food lion's mane and pink oyster mushroom Does Not Meet

The ingredient submission(s) are not unique/specific to a particular variety and list the intent to make multiple therapeutic claims which are not allowed in a non-medicated animal feed.

Attachment C Animal Protein Products Report

Ingredient Definition Committee
Animal Products working Group Report

The working group has met and discussed several items. The initial priority has been to propose edits to the current Meat Meal and Meat and Bone Meal definitions to update them to better apply to current products being manufactured. The use of the phosphorus releasing enzyme phytase has led to the inability to achieve the phosphorus/calcium ratio required by previous versions. Therefore, with increased innovations in animal nutrition as well as the rendering process, the committee has decided to propose the following minor edits to the definitions. Through discussion and utilization of analyses from both the industry and regulatory partners, a decision was made to propose for further discussion the following edits. The use of 28% Ash content to delineate the two ingredients who are otherwise identical in raw material composition was based on thousands of analyses that were contributed. For discussion, the proposed edits are expressed in red below and are provided for additional comment and editing.

In addition, during discussion by the committee, the items in green were included to prompt further receipt of comments from both regulators and the industry. Questions posed (in green text) included: Is there a need by some states or others to include an additional "guarantee" on ash concentration for enforcement? Additionally, it was observed the while present in the meat meal definition, the guarantee for crude fiber was not present in the meat and bone meal definition. Does it need to be included? Finally, there was additional discussion surrounding the need or not to include a maximum (see green text "not to exceed") for the meat meal definition. The working group recommended that the not to exceed isn't necessary but would appreciate additional feedback and input from the larger organization.

> ***9.40 Meat Meal** is the rendered product from mammal tissues, exclusive of any added blood, hair, hoof, horn, hide trimmings, manure, stomach and rumen contents except in such amounts as may occur unavoidably in good processing practices. It shall not contain added extraneous materials not provided for by this definition. The total ash content for the product should not exceed 28%. It shall not contain more than 12% Pepsin indigestible residue** and not more than 9% of the crude protein in the product shall be pepsin indigestible**. The label shall include guarantees for minimum crude protein, minimum crude fat, maximum crude fiber, maximum ash??, minimum Phosphorus (P) and minimum and maximum Calcium (Ca). If the product bears a name descriptive of its kind, composition or origin, it must correspond thereto. (Proposed 1971, Published 1972, Amended 1985, 1993)
>
> IFN 5-00-385 Animal meat meal rendered

> ***9.41 Meat and Bone Meal** is the rendered product from mammal tissues, including bones, exclusive of any added blood, hair, hoof, horn, hide trimmings, manure, stomach and rumen contents, except in such amounts as may occur unavoidably in good processing practices. It shall not contain extraneous materials

not provided for in this definition. It is a source of protein in animal diets. The total ash content for the product should contain a minimum of 28% ash ???but not to exceed???It shall not contain more than 12% pepsin indigestible residue** and not more than 9% of the crude protein in the product shall be pepsin indigestible**. The label shall include guarantees for minimum crude protein, minimum crude fat, ?? crude fiber??, ???minimum ash???minimum Phosphorus (P) and minimum and maximum Calcium (Ca). If the product bears a name descriptive of its kind, composition, or origin, it must correspond thereto. (Proposed 1985, Amended 1992, Published 1994, Amended 2025)

IFN 5-00-388 Animal meat with bone rendered

Additional items that the working group will discuss in future meetings include Collagen, Bone Broth, and possible Mixed species meat meal and meat and bone meal edits or inclusions. Additional input from both industry and regulators is welcomed.

Attachment D: Enzyme Marketing Coordination Workgroup Report

Workgroup Charge
Review the Enzyme Marketing Coordination document within the AAFCO OP to make relevant updates.

Workgroup Recommendations
1. Make updates to the Enzyme Marketing Coordination section as described below for inclusion in the 2026 spring OP edits:
   a. Add "Example Enzyme Product Label"at top of p. 405;

b. Add missing label elements: Storage conditions (after directions for use), Use-by/expiry date, and Lot number (after quantity statement), and Manufactured for/by after Lot number to the Example Enzyme Product Label on p. 405;

c. Update the safety section to replace Pariza and Foster with Pariza and Cook. Specifically on p. 402, change first and second sentences as edited here: "Pariza and Cook (2010) have developed a set of guidelines to assess the safety of enzymes used in animal feed. These guidelines address the safety of the source organism and the enzyme itself. Enzyme preparations that meet or surpass the criteria proposed by Pariza and Cook should be safe for use in animal feed when utilized at the low levels normally employed for these catalysts.";

d. on p. 405, replace the Pariza and Foster reference with the Pariza and Cook one: Pariza MW, Cook M. Determining the safety of enzymes used in animal feed. Regul Toxicol Pharmacol. 2010 Apr;56(3):332-42. doi: 10.1016/j.yrtph.2009.10.005. Epub 2009 Oct 30. PMID: 19879914.

2. The workgroup recommends that a new workgroup be established with representation from MBRC, AFC, and PFC to review and update the enzyme guarantee sections in the Model Regulations, Pet Food Model Regulations, and related guidance materials (e.g., labeling guides and checklists). This review should address identified inconsistencies across regulations, as well as the labeling burden associated with enzyme activity unit meaning [definition] and their required explanations. To support this effort, the has prepared a document (**Attachment 1**) identifying all enzyme-related references within the Model Regulations and Pet Food Model Regulations. Some of the current workgroup members will be glad to serve in the new WG to address the identified inconsistencies in labeling of commercial feed and pet food containing enzymes.

Workgroup Participants
Members Present: Marissa Kost, Jordyn Johnston
Staff/Advisors Present: Emily Helmes, Daniela Soloman, Richark Ten Eyck
Absent: None

Workgroup Meeting Minutes/Other Comments
Date of Meeting: 11/12/2025

Minutes: The workgroup met to discuss labeling issues in the Enzyme Marketing Coordination (EMC) document, which, although dated, remains actively used to guide enzyme submissions. The group discussed confusion surrounding the example enzyme label, particularly the inclusion of enzyme unit definitions, and clarified that the example applies to an enzyme product rather than a mixed feed and that unit definitions are firm and enzyme specific and are tied to quality and activity measurement. Potential updates were identified, including clarifying the label example, addressing its incomplete elements, reviewing the Regulatory Approach section and literature references, and confirming requirements within other parts of the OP for enzyme unit definitions.
Action Items: WG members will review the document for outdated content, Emily will relay ETA Feed Committee input, and a follow-up meeting will be scheduled for December or January.

Date of Meeting: 12/11/2025
Minutes: The workgroup met to continue discussions on enzyme labeling and OP alignment. The group reviewed recent recommendations from the ETA Feed Committee, including clarifying the EMC example label as an "Example Enzyme Product Label," adding missing label elements (manufactured for/by, use-by/expiry date, and lot code), and updating the safety section to reference Pariza and Cook (2010). It was proposed that the Model Bill and Regulations Committee (MBRC) review enzyme guarantee sections in both model regulations for commercial feed and pet food model regulations due to apparent inconsistencies and labeling burden related to enzyme activity unit meaning [definition]. This workgroup will provide the new workgroup with recommendations/items to focus on. Lastly, broader concepts such as use of QR codes for supplemental labeling information was also discussed.
Action Items: Make updates to the Enzyme Marketing Coordination section as described above for inclusion in the 2026 spring OP edits. Provide a recommendation to form a new workgroup(s) engaging AFC, PFC, and MBRC to review and update any model regulations and/or pet food model regulations for enzyme guarantee sections. Recommedations and items to focus on will be provided to the new workgroup(s) from this workgroup.

EMC Workgroup Completion Date: 01/15/2026

Attachment 1: Model Bill Regs and Pet Food Regs Refs to Enzymes