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AAFCO definition process as it relates to distillers co-products, animal feed and pet food

Dan King

- Grew up on dairy farm in WI
- Worked for a small cooperative for 12 years
- 14 Years with Minnesota Department of Agriculture
- 12 Years Involved with AAFCO
- ~3 Years as Distillers Products Investigator

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About AAFCO

- Association of American Feed Control Officials
  - **www.aafco.org**
- Recognized internationally as feed standards benchmark
- Comprised of States, Territories, Canada, FDA & Industry Advisors
- Started in 1909 as a means to:
  - Standardize ingredients & labeling.
  - Promote national animal food uniformity
  - Ensure the safety of feed ingredients
  - Keep a level playing field for industry

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Industry is innovative & creative

- Black Soldier Fly Products
- Hemp Products
- Algae Products
- Distillers Products

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There are 3 recognized ways for ingredient “approvals”

- Food Additive Petition
  - Additives that may alter composition of human food/Human health benefit claims (Omega 3)
- GRAS/Self-Determined GRAS
  - Self-determined is not recognized by all States
- AAFCO Definition Process

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So, you have a new ingredient?

- Check official definitions in current AAFCO Official Publication
  - Last year's Chapter Six on AAFCO website for free
- If you are not sure about existing definition(s), contact investigator
  - Or definitions@aafco.org
- If you are sure that you have a new ingredient, then you will have to start a new ingredient definition request
- Follow guidelines in Official Publication (page 345 '23 Official Publication)

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How a new ingredient definition moves forward…

- Compile a dossier (from Official Publication) containing :
    1) Firm name and contact
    2) Summary of the request
    3) Proposed definition
    4) Description of the ingredient
    5) Proposed labeling
    6) Historical regulations (if any)
    7) Description of the manufacturing process

How a new ingredient definition moves forward…

- 8) Use limitations
- 9) Intended use of the ingredient (Species, class, rate, etc.)
- 10) Safety assessment
  - Manufactures are responsible for the safe manufacture and use for intended species
- 11) List of sited literature
- 12) Copies of all cited reports

How a new ingredient definition moves forward…

- Investigator reviews submission
- Review should be completed within 30 days
  - If any revisions needed, Investigator returns for correction
- Investigator will double-check for completeness and send to the USFDA Division of Animal Feeds, Center for Veterinary Medicine
- The FDA will complete their review within 180 days
  - If there is missing information, or more documentation needed, then the 180 starts after receipt.
  - FDA will communicate directly with firm contact

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How a new ingredient definition moves forward…

- If all goes well, a “No objections” letter will be sent by FDA
- Investigator will put new ingredient on Ingredient Definitions Committee agenda for next meeting
  - Regulators and industry can raise questions and/or concerns
  - Committee deliberates on definition
- When voted for acceptance, definition goes to AAFCO Board of Directors for vote to accept
  - If rejected, it gets sent back to Ingredient Definition Committee
- When Board approves, vote goes to AAFCO General Membership for Tentative status in Official Publication

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How a new ingredient definition moves forward…

- After 90 business days in Tentative status, Investigator can recommend ingredient be moved to Official status
- Definition goes back to Ingredient Definitions Committee to vote for Official status
- Board of Directors votes to accept as Official Definition and to recommend to Membership
- Membership votes to accept as Official Definition
- Official status is granted immediately after affirmative vote
  - Becomes a non-proprietary ingredient

Challenges

- Must compile peer reviewed data
  - There may be little data for new/novel ingredient
  - Long-term safety data may be difficult to obtain
  - Historical use may not exist for new ingredient
- Fewer species/classes may make submission faster
  - Single species safety data may be easier than multiple species
  - Non-food animals may help speed process up
  - Inclusion rate in feed is factor if consumed daily for years

Challenges

- Turn Around Time
  - Investigator
  - FDA Review
  - Ingredient Definition Committee
  - AAFCO Board
  - AAFCO General Membership
  - Other Industry Opposition

Challenges

- Consumers may not like product name
  - Pet food consumers may not be knowledgeable regarding “feed”
  - Pet food consumers often want human food standards
  - Byproducts get a bad name

In conclusion

- Have a current copy of the AAFCO Official Publication
- Get to know your ingredient Investigator
- Ensure that your dossier is complete, especially safety data
- Attend AAFCO meetings

Questions?

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