

Regulation of Animal Foods

2024 Distillers Grains Technology Council Symposium

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FDA
Center for Veterinary Medicine
Division of Animal Food Ingredients

November 12, 2024

Outline

- CVM Reorganization
- Statutes
 - Applicable Food Law
 - DSHEA
 - Definitions
- Premarket Pathways
 - Labeling
- What's New
 - AAFCO
 - AFIC
 - Innovative FEED Act
- Distillers Products in Feed
 - Claims
 - Uses



Reorganization at CVM

Div. Animal Food
Ingredients

Div.
Pharmacovigilance
and Surveillance

FDA-CVM
OFFICE SURVEILLANCE &
COMPLIANCE

Div. Drug
Compliance

Div. Food
Compliance

ORA

Applicable US Food Law

- Federal Food Drug and Cosmetic Act (FFDCA)

– Food Safety Modernization Act (FSMA)

- Regulations based on various parts of the statute



Non-Applicable US Law

- Dietary Supplement Health Education Act (DSHEA)
 - Does not apply to Animals*

*Federal Register (FR) Notice 61:17706-08, April 22, 1996



Articles for Animals are Regulated as either a Food, a Drug, a Device, or Color



FFDCA Definitions

- Food
 - FFDCA section 201(f) – the term “food” means (1) article used for food or drink for man or other animals, (2) chewing gum, and (3) articles used for components of any such article.



FFDCA Definitions

- Food Additive
 - FFDCA section 201(s) - Any substances reasonably expected to become a component, or affect characteristics of food (directly or indirectly), unless GRAS
 - Animal Food Additives are in 21 CFR 573
 - No premarket approval for foods or food additives commonly added to foods prior to 1958 (history of use)



FFDCA Definitions

- Color Additive
 - Any material that imparts color to the *food* or to *flesh of animals*
 - Unless exempt...
 - 21 CFR 70 to 73



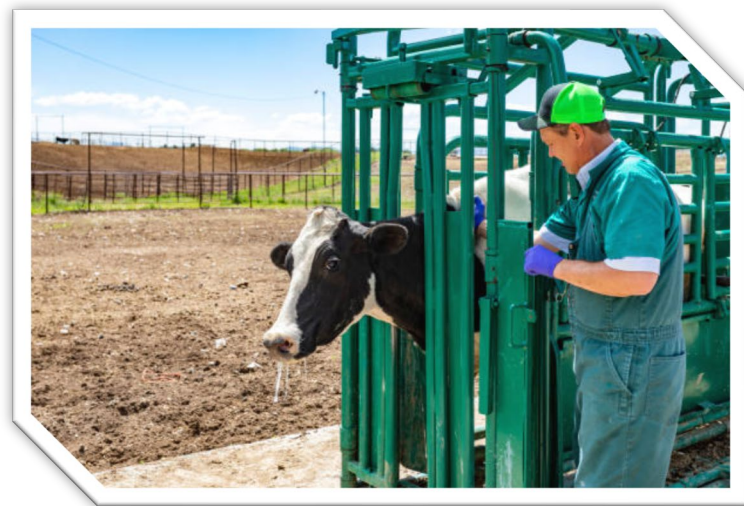
FFDCA Definitions

- Drug
 - FFDCA section 201(g) Articles intended to **diagnosis, cure, treat, mitigate, or prevent disease** in man or other animals.
 - Articles (**other than food**) intended to affect the structure or function of the body.



FFDCA Definitions

- New Animal Drug
 - Any drug (approved or unapproved) intended for use in animals, including use in animal feed
 - 21 CFR 510 (new animal drugs)
 - 21 CFR 558 (medicated feed)



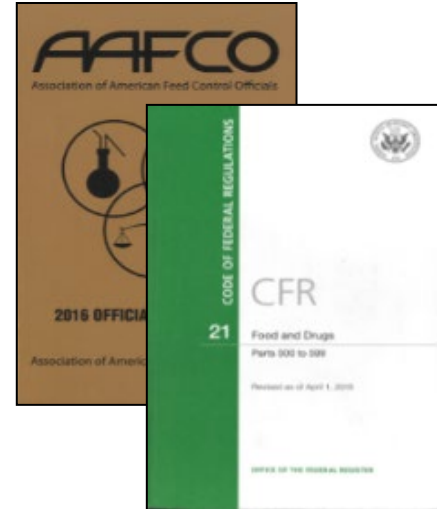
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Premarket Pathways

- Food Additive (FA) Regulation
 - 21 CFR 570 to 573
- Generally Recognized as Safe Conclusion (GRAS)
 - 21 CFR 570.203 to 280
 - Final Ruled Published Aug. 2016 (81 FR 54959)
- Color Additive Regulation (21 CFR 70 to 73)
- AAFCO¹ Feed Ingredient Definition – FDA MOU expired Oct. 1, 2024



¹ Association of American Feed Control Officials

Premarket Pathways

- Food Additive (FA) Regulation
 - 21 CFR 570 to 573
 - Food Additives are not Proprietary
 - *Anyone meeting the specs can go to market*
 - Printed in 21 CFR 573 & AAFCO *Official Publication*
 - GFI # 221 published June 2015
 - Recommendations for Preparation and Submission of **Animal Food Additive Petitions**

#221

Guidance for Industry

Recommendations for Preparation and Submission of Animal Food Additive Petitions

Submit comments on this guidance at any time. Submit written comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Room 1061, Rockville, MD 20852. Submit electronic comments on the guidance at <http://www.regulations.gov>. All written comments should be identified with the Docket No. FDA-2013-D-0928.

For further information regarding this document, contact [Mika Alewynse](mailto:Mika.Alewynse@fda.hhs.gov), Center for Veterinary Medicine, Division of Animal Feeds (HFV-229), Food and Drug Administration, 7519 Standish Place, Rockville, MD 20855, 240-402-5843; email: Mika.Alewynse@fda.hhs.gov.

Additional copies of this guidance document may be requested from the Policy and Regulations Staff (HFV-6), Center for Veterinary Medicine, Food and Drug Administration, 7519 Standish Place, Rockville, MD 20855, and may be viewed on the internet at either <http://www.fda.gov/AnimalVeterinary/default.htm> or <http://www.regulations.gov>.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine
June 2015

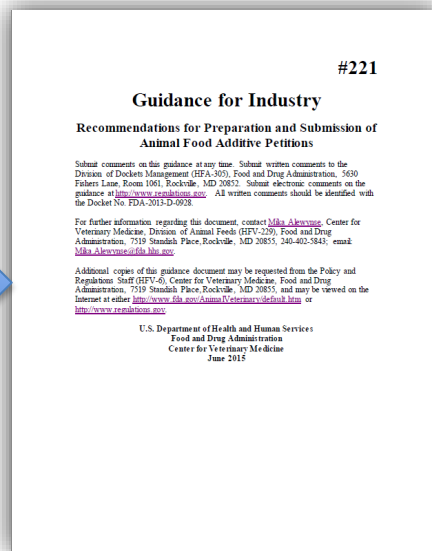
<https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-221-recommendations-preparation-and-submission-animal-food-additive-petitions>

Premarket Pathways

Successfully Complete 7-8 Technical Sections

1. Utility (nutrition or technical effect)
2. Target Animal Safety
3. Human Food Safety (if applicable)
4. Environmental Safety
 - Categorical Exclusion Possible
5. Chemistry and Manufacturing
 - Manufacturing Process
 - Ing. Composition
 - Analytical Method Validation
 - Specifications
 - Stability (?)
 - Mixability (?)
6. Bioengineering (if applicable)
7. Regulation
8. Mock Label

See GFI #221 for
more Info



Premarket Pathways

- Generally Recognized as Safe (GRAS)
 - The use of a substance may be GRAS
 - An Individual Firm's Conclusion
 - Same Quantity and Quality of Information as FAP, but Safety Data are Public
 - Under US Law Color Additives cannot be GRAS

Subpart E—Generally Recognized as Safe (GRAS) Notice

570.203	Definitions.
570.205	Opportunity to submit a GRAS notice.
570.210	How to send your GRAS notice to FDA.
570.215	Incorporation into a GRAS notice.
570.220	General requirements applicable to a GRAS notice.
570.225	Part 1 of a GRAS notice: Signed statements and certification.
570.230	Part 2 of a GRAS notice: Identity, method of manufacture, specifications, and physical or technical effect.
570.235	Part 3 of a GRAS notice: Target animal and human exposures.
570.240	Part 4 of a GRAS notice: Self-limiting levels of use.
570.245	Part 5 of a GRAS notice: Experience based on common use in food before 1958.
570.250	Part 6 of a GRAS notice: Narrative.
570.255	Part 7 of a GRAS notice: List of supporting data and information in your GRAS notice.
570.260	Steps you may take before FDA responds to your GRAS notice.
570.265	What FDA will do with a GRAS notice.
570.275	Public disclosure of a GRAS notice.
570.280	Submission of a supplement.

Premarket Pathways

- Generally Recognized as Safe (GRAS)
 - GRAS Inventory On FDA Website (differs from CFSAN's list!)

<https://www.fda.gov/animal-veterinary/generally-recognized-safe-gras-notification-program/current-animal-food-gras-notices-inventory>

Current Animal Food GRAS Notices Inventory

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The following table is provided on an interim basis, until the Animal Food GRAS Notices Inventory database is launched. The data provided are current through 10/8/2024. A decision on FDA's part to file a submission as a GRAS notice has not reflected our judgment as to whether the notice addressed all issues or discussed all critical data or information.

Persons using assistive technology may not be able to fully access information in the submissions. For assistance, please call 240-402-7002.

AQRN (selected AQRN No. for detailed records)	Notifier	Substance	Intended Use	Intended Species	Date of Filing	FDA's Letter (select to view letter)
1 (PDF - 387 pages)	Resonant Biosciences, Inc.	Chlorine dioxide	To be used as a processing aid, with a maximum application rate of 55 ppm per batch, in the production of non-food grade ethanol, food grade ethanol, and distillers grains for animal feed use for food-producing animals.	Food-producing animals.	12/21/2010	Notice does not provide a basis for a GRAS determination (PDF - 6 pages)
2	Lallemand Specialties Inc., doing business as Lallemand Ethanol Technology	Penicillin G potassium	To control the levels of contaminants and their by-products in the production of non-food grade and food grade ethanol and distillers grain for target animal feed use at a level not to exceed 5 ppm of commercial product or 2.7 ppm of penicillin G potassium, in the fermenter.	Beef cattle, dairy cows, and/or chickens, egg-laying chickens, swine, and sheep. Pets including dogs, cats, guinea pigs and horses.	12/23/2010	At notifier's request, FDA ceased to publish the notice. (PDF - 2 pages)
3 (PDF - 150 pages)	Hill's Pet Nutrition Inc.	alpha-Lipoic acid	To be used as an ingredient in dry foods for adult dogs at levels up to 150 ppm or 0.0150% (as a cellular antioxidant and cofactor of enzymes involved in the metabolism of carbohydrates and amino acids.	Adult dogs (i.e., at least 1 year old).	2/8/2011	Notice does not provide a basis for a GRAS determination (PDF - 5 pages)

Premarket Pathways

- Generally Recognized as Safe (GRAS)
 - Notifying FDA-CVM Voluntary
 - 7 Parts of GRAS Notice
 - Outlined in the CFR (21 CFR 570.220 -255)
 - How To Submit a GRAS Notice
 - CVM Website:
 - <https://www.fda.gov/animal-veterinary/generally-recognized-safe-gras-notification-program/how-submit-gras-notice-cvm>
 - <https://www.fda.gov/animal-veterinary/animal-food-feeds/generally-recognized-safe-gras-notification-program>

Subpart E—Generally Recognized as Safe (GRAS) Notice

- 570.203 Definitions.
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- 570.210 How to send your GRAS notice to FDA.
- 570.215 Incorporation into a GRAS notice.
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Labeling

1. Product Name
2. Purpose Statement
3. Ingredients List
 - Label **Everything** added to animal foods
 - Including preservatives
 - Exceptions for Incidental
 - In Order of Predominance (by weight)
4. Guaranteed Analysis
5. Directions for Use
6. Warning/ Cautionary Statement
7. Manufacturer / Distributor
8. Country of Origin Statement
9. Net Contents

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What's New?

- AAFCO Feed Ingredient Definitions
 - CVM MOU with AAFCO ended Oct 1, 2024
 - **GFI #293** – Enforcement Policy for AAFCO Ingredients **(Oct 23, 2024)**

#293

FDA Enforcement Policy for AAFCO-Defined Animal Feed Ingredients

Guidance for Industry

Submit comments on this guidance at any time. Submit electronic comments to <https://www.regulations.gov>. Submit written comments to the Dockets Management Staff (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number FDA-2024-D-2977.

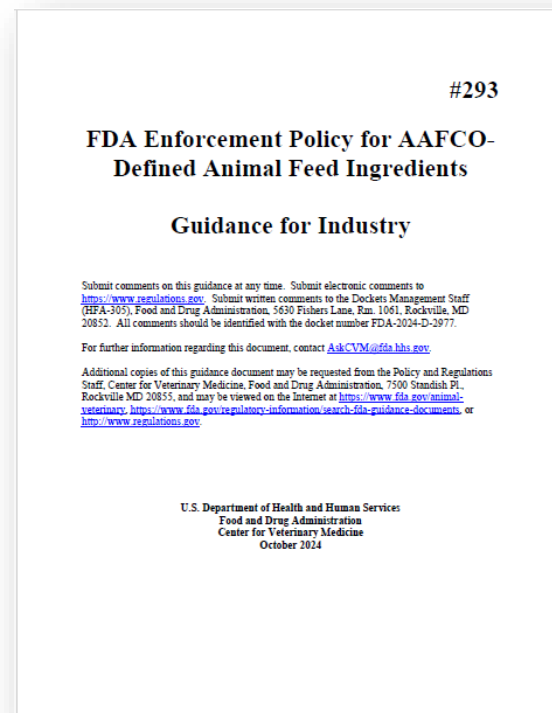
For further information regarding this document, contact AskCVM@fda.hhs.gov.

Additional copies of this guidance document may be requested from the Policy and Regulations Staff, Center for Veterinary Medicine, Food and Drug Administration, 7500 Standish Pl., Rockville MD 20855, and may be viewed on the Internet at <https://www.fda.gov/animal-vegetarian>, <https://www.fda.gov/regulatory-information/search-fda-guidance-documents>, or <http://www.regulations.gov>.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine
October 2024

What's New?

- **GFI #293** Enforcement Policy for AAFCO
 - **Finalized on Oct 23, 2024**
 - Replaces **CPG 665.100**
 - *“Common or Usual Names for Animal Feed Ingredients”*
 - AAFCO Ingredients
 - Are **Not** Approved Food Additives
 - **Not** Formally Recognized as GRAS for its Use



What's New?

- **GFI #293** Enforcement Policy for AAFCO
 - Generally, to be legally introduced **into interstate commerce**,
 - Must be an Approved Animal Food Additive
 - Or GRAS for its intended use
 - FDA Generally does **Not** intend to Initiate **Enforcement Action** for Ingredients Listed in the 2024 AAFCO OP that are Not Approved Food Additives or GRAS

#293

FDA Enforcement Policy for AAFCO- Defined Animal Feed Ingredients

Guidance for Industry

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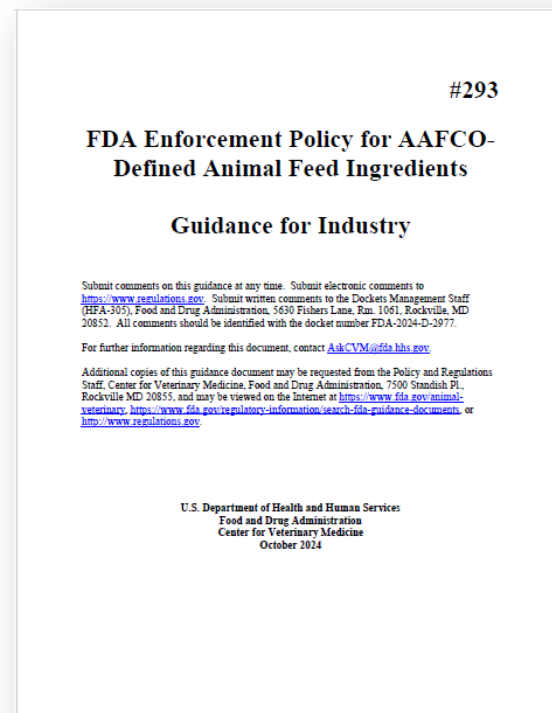
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U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine
October 2024

What's New?

- **GFI #293** Enforcement Policy for AAFCO
 - FDA Generally does **Not** intend to Initiate **Enforcement Action** for Ingredients Listed in the 2024 AAFCO OP that are Not Approved Food Additives or GRAS
 - Listed in Chapter 6 of the **2024 AAFCO OP**
 - Used In Accordance with Intended use, Specifications, Limitations listed within Chapter 6
 - FDA has no New Questions or Concerns About the **Safety**



What's New?

- **GFI #293** Enforcement Policy for AAFCO
 - **Common Name**
 - Label Must bear The Common or Usual Name
 - Must **Not** be False or Misleading
 - Can be determined from Various Sources
 - Including from the AAFCO OP
 - FDA Generally does **Not** Intend to Initiate **Enforcement Action** for use of the Common or Usual Name Derived from Chapter 6 of the AAFCO OP

#293

FDA Enforcement Policy for AAFCO-Defined Animal Feed Ingredients

Guidance for Industry

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U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine
October 2024

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- Premarket Pathways
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What's New?

- Animal Food Ingredient Consultation (AFIC)
 - Intended for Ingredients that would have used AAFCO process
 - **Not yet Implemented**
 - Interim Process
 - Draft GFI #294

#294

Animal Food Ingredient Consultation (AFIC)

Guidance for Industry

Draft Guidance

This guidance document is being distributed for comment purposes only.

Submit comments on this draft guidance by the date provided in the *Federal Register* notice announcing the availability of the draft guidance. Submit electronic comments to <https://www.regulations.gov>. Submit written comments to the Dockets Management Staff (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. All comments should be identified with docket number FDA-2024-D-2978.

For further information regarding this document, contact Charlotte Conway, Center for Veterinary Medicine, Food and Drug Administration, 7500 Standish Pl., Rockville, MD 20855, 240-402-6768, charlotte.conway@fda.hhs.gov.

Additional copies of this draft guidance document may be requested from the Policy and Regulations Staff, Center for Veterinary Medicine, Food and Drug Administration, 7500 Standish Place, Rockville MD 20855, and may be viewed on the internet at <https://www.fda.gov/animal/veterinary>, <https://www.fda.gov/regulatory-information/search-fda-guidance-documents>, or <http://www.regulations.gov>.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine (CVMD)
August 2024

What's New?

- Animal Food Ingredient Consultation (AFIC)
 - Draft GFI #294
 - Guidance is Draft.
 - “...ingredients that make up a significant proportion of an animal’s diet such as, but not limited to plants materials, grains, or human food by-products.”

#294

Animal Food Ingredient Consultation (AFIC)

Guidance for Industry

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U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine (CVMD)
August 2024

What's New?

- Animal Food Ingredient Consultation (AFIC)
 - Consultations are Public Knowledge
 - Public Will See FDA is Providing Consultation
 - Public can Provide Input
 - Including Additional Safety Data
 - FDA's Response will be Posted to AFIC Inventory Website

#294

Animal Food Ingredient Consultation (AFIC)

Guidance for Industry

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U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine (CVM)
August 2024

What's New?

- Animal Food Ingredient Consultation (AFIC)
 - Pending & Completed [Inventory Webpage](#)
 - Substance Identity
 - Intended Use
 - Target Animal Species
 - Submitter
 - FDA's Final Letter

#294

Animal Food Ingredient Consultation (AFIC)

Guidance for Industry

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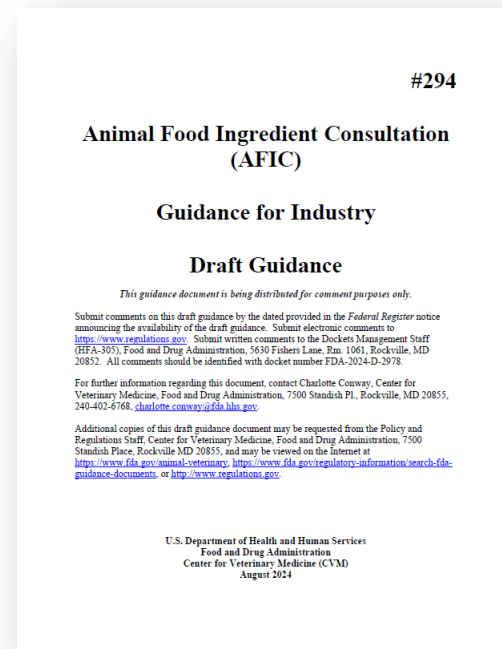
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U.S. Department of Health and Human Services
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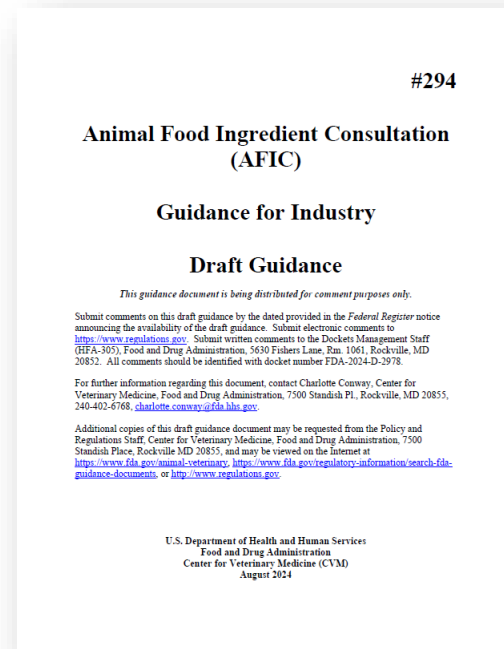
What's New?

- Animal Food Ingredient Consultation (AFIC)
 - Data Packages will Be Similar to AAFCO Ing. Review
 - Contact Firm
 - Summary
 - Ingredient Description / Composition
 - Manufacturing Information
 - Purpose (Intended Use)
 - Target Animal Safety Assessment
 - Human Food Safety (if applicable)
 - Statement of Environmental Risk
 - Copies of Cited Literature



What's New?

- Animal Food Ingredient Consultation (AFIC)
 - Firms are Invited to Come Speak with CVM
 - Discuss your Proposed Ingredient
 - Determine if AFIC is a Fit
 - Come even before Guidance is Finalized
 - Contact us at: Animalfood-premarket@fda.hhs.gov



What's New?

- Animal Food Ingredient Consultation (AFIC)
 - Ingredients Subject to AFIC Consultation
 - Are Not Approved Food Additives
 - Not Formally Recognized as GRAS for its Use

#294

Animal Food Ingredient Consultation (AFIC)

Guidance for Industry

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U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine (CVMD)
August 2024

What's New?

- Animal Food Ingredient Consultation (AFIC)
 - FDA Generally does **Not** intend to Initiate **Enforcement Action** for Ingredients Reviewed Under a Consultation.
 - Used in Accordance with “Consultation Complete Letter”
 - FDA has no New Questions or Concerns About the Safety

#294

Animal Food Ingredient Consultation (AFIC)

Guidance for Industry

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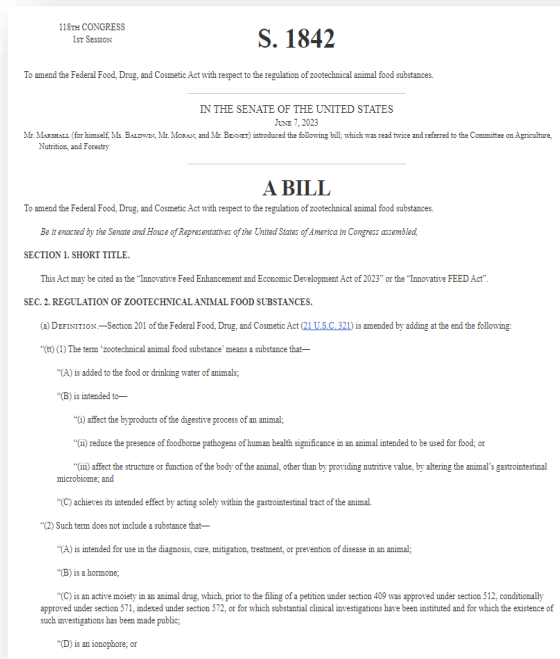
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What's New?

- Innovative FEED Act
 - Proposed Legislation (**Not yet Passed**)
 - Would permit Non-Nutritional Production Claims
 - Zootechnical Animal Food Substances (ZAFS)
 - Affects Byproducts of Digestion (**Environmental**)
 - Altering Gastrointestinal Microbiome
 - Reduce Foodborne Pathogens of Human Significance in Food Animals (**peri-slaughter only**)





What's New?

FDA Letter to Industry: Industry Encouraged to Contact FDA Regarding Novel Animal Foods with Drug Claims

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Resources for You

[For Industry](#)

[For Veterinarians](#)

[CVM en español](#)

[CVM Puts One Health into](#)

Dear Stakeholder,

The U.S. Food and Drug Administration is aware that the animal feed industry is interested in bringing to market animal food substances that act solely within the gut of the affected animal with scientifically substantiated claims related to animal production, animal well-being, food safety, and environmental benefits, as animal food. FDA encourages firms with these novel products for animals to contact the agency early in the product development process.

To facilitate animal and veterinary product advancement, and to encourage the development of safe, novel products and products for unmet human and animal needs,

Content current as of:
02/02/2024

Animalfood-premarket@fda.hhs.gov

Outline

- CVM Reorganization
- Statutes
 - Applicable Food Law
 - DSHEA
 - Definitions
- Premarket Pathways
 - Labeling
- What's New
 - AAFCO
 - AFIC
 - Innovative FEED Act
- **Distillers Products in Feed**
 - Claims
 - Uses



Distillers Products as Feed

- Structure Function Claims
 - Source of Nutrition
 - PPM 1240.3605 withdrawn May 20, 2024
 - Performance / Production Claims
 - *Structure Function Guidance is Under Development*



Distillers Products as Feed

- Structure Function Claims
 - Not a Source of Nutrition
 - These are “Drug Claims”
 - Production Claims
 - Claims to Cure, Treat, Prevent, Mitigate Disease
 - Not permitted for Foods



Distillers Products as Feed

- Current Ingredients
 - 12.6 Barley Distillers Protein Concentrate
 - 27.1 Molasses Distillers Dried Residue
 - 27.2 Molasses Distillers Cond. Solubles
 - 27.3 Potato Distillers Dried Solubles
 - 27.4 ___ Distillers Dried Solubles
 - 27.5/27.6 ___ Distillers Dried Grains (with Solubles)
 - 27.7 Condensed Distillers Solubles
 - 27.8 ___ Distillers Wet Grains
 - 27.9 Deoiled Corn Distillers Dried Grains with Solubles Sol. Ext.
 - 33.10 ___ Distillers Oil, Feed Grade
 - 73.100 Yeast for Production of Distillers Products (2 yeasts defined)
 - 96.5 Grain Distillers Dried Yeast

Distillers Products as Feed

- Although [FDA](#) has the responsibility to ensure the safety of animal feed products, the [ultimate responsibility](#) for the production of safe and effective animal feed products lies with the [manufacturers and distributors](#) of the products.
- IF Producing an Animal Feed Product:
 - Consider that [Everything](#) added During the Production of Fuel Ethanol Should be Suitable for [Direct](#) Use in Animal Feed/Food.
 - [Mitigate any Potential Hazards or Concerns that Might be Identified](#)

Distillers Products as Feed

- Manufacturing of Ethanol/DDG impacted by FDA
 - Feedstock for Fermenters
 - Accepted Material?
 - GE Plants?
 - Fermentation Process
 - Microorganisms
 - Enzymes
 - Processing Aids
 - Antimicrobials
 - Post-Processing Aids
 - Contaminants in Finished Ingredient
 - Pesticides/Industrial Chemicals
 - Heavy Metals
 - Mycotoxins
 - Microbes
 - Dioxins/Furans/PCB,
 - Others



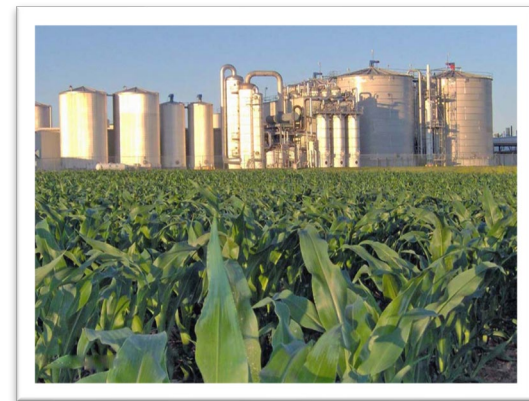
Distillers Products as Feed

- Regarding Contaminants:
 - Compliance Program Guidance Manual
 - Feed Contaminants Program,
Withdrawn Pending Revision (CPGM 7371.003)
 - Comprehensive Sampling Compliance Program (**In Development**)
 - Distillers Products will continue to be part of the Contaminant Surveillance Program
 - Not Currently Targeted for any Specific Contaminant/Residue



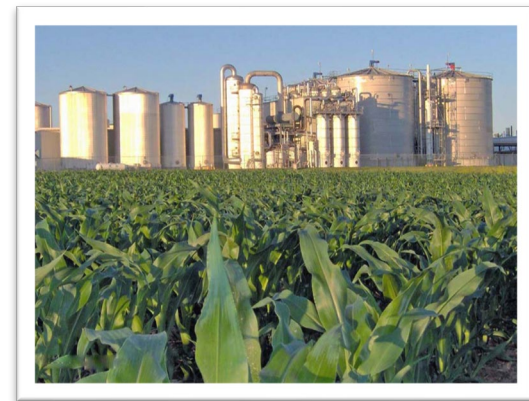
Distillers Products as Feed

- Antimicrobial Usage
 - Animal Feed Production
 - May result in Residues in or on Food (distillers grains)
 - Unapproved Food Additive.
 - Presence Would Be Adulteration
 - Because Unapproved for Addition to Animal Feed, Manufacturers Asked to Prevent Antimicrobial Residues in Animal Feed



Distillers Products as Feed

- Antimicrobial Usage
 - Non-Animal Feed Use (Burn, Soil Application, etc)
 - Antimicrobial a Pesticide and Regulated by the Environmental Protection Agency (EPA) under the **Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)**.



Distillers Products as Feed

- GE Yeast for Production of Distillers Products
 - Bioengineered
 - Feed to Contain No Live GE Yeast (not a DFM!)



Biofuel Production (73.090–104)

73.100 Yeast for Production of Distillers Products. The ingredients list of the yeast marketed to the ethanol manufacturer should declare the genus species of the yeast and the enzyme(s) expressed.

Saccharomyces cerevisiae expressing glucoamylase from *Saccharomycopsis fibuligera* for use in dry grind corn fuel ethanol production of distillers coproducts for animal feed. Distillers products for use in animal feed contain no live bioengineered yeast.

and/or

Saccharomyces cerevisiae expressing pyruvate formate lyase activating enzyme, pyruvate formate lyase, and bifunctional acetaldehyde-CoA/alcohol dehydrogenase from *Bifidobacterium adolescentis* and a glucoamylase from *Saccharomycopsis fibuligera* for use in dry grind corn fuel ethanol production of distillers products for animal feed. Distillers products for use in animal feed contain no live bioengineered yeast. (Proposed 2013, 2014, rev. 1, Adopted 2015 rev. 1)



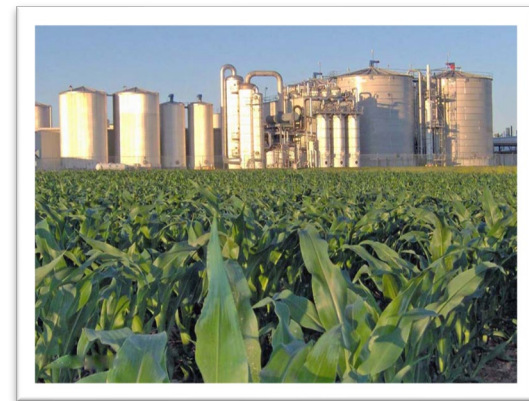
Distillers Products as Feed

- Evaluation of GE Yeast
 - Ability to ferment <substrate> and produce ethanol
 - Purified/Defined or Complex Media
 - i.e., Broth, Corn mash, or _____.
 - Cellulosic Application Not Yet Completed

Biofuel Production (73.090–104)
73.100 Yeast for Production of Distillers Products. The ingredients list of the yeast marketed to the ethanol manufacturer should declare the genus species of the yeast and the enzyme(s) expressed.
Saccharomyces cerevisiae expressing glucoamylase from *Saccharomycopsis fibuligera* for use in dry grind corn fuel ethanol production of distillers coproducts for animal feed. Distillers products for use in animal feed contain no live bioengineered yeast.
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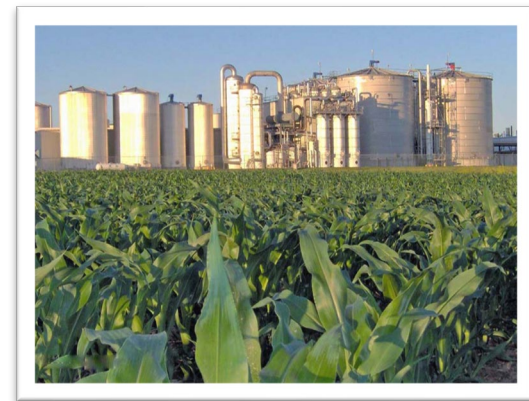
Distillers Products as Feed

- Evaluation of GE Yeast (con't)
 - Microbial / Molecular Safety
 - Demonstrate Function of Engineered traits
 - It does what is Intended
 - Trait Persists over time (~100 generations)
 - Composition of Yeast and Distillers Product
 - Proximate, NDF, ADF, Fatty acids, Amino Acids, Sulfur
 - Compare to Conventional DDG(S)
 - Yeast Component of Feed (source of NTR)



Distillers Products as Feed

- Evaluation of GE Yeast (con't)
 - Feedings Studies not Required unless...
 - Novel Distillers Product Produced
 - i.e., Cellulosic (corn stover, switchgrass, wood chips, etc)



Distillers Products as Feed

- Getting Started:
 - Contact Our Office
 - Animalfood-premarket@fda.hhs.gov
 - Before Conducting Studies
 - We Review Study Protocols
 - See GFI #56 (protocol development)



Resources

1. www.fda.gov/safefeed
2. **GFI #221 – Prep and Submission of an FAP**
 - <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-221-recommendations-preparation-and-submission-animal-food-additive-petitions>
3. **CVM GRAS Inventory**
 - <https://www.fda.gov/animal-veterinary/generally-recognized-safe-gras-notification-program/current-animal-food-gras-notice-inventory>
4. **GFI #262 – Pre-submission Consultation**
 - <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-262-pre-submission-consultation-process-animal-food-additive-petitions-or-generally>
5. **GFI #293 – Enforcement Policy on AAFCO Ingredients**
 - <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-293-fda-enforcement-policy-aafco-defined-animal-feed-ingredients>
6. **GFI #294 – Animal Food Ingredient Consultation**
 - <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-294-animal-food-ingredient-consultation-afic>
7. **GFI #56 – Protocol Development**
 - <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cvm-gfi-56-protocol-development-guideline-clinical-effectiveness-and-target-animal-safety-trials>

Distillers Products as Feed

THE END

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