

Feed Committee

Report to the NGFA Board of Directors

March 2025

I. Key Issues

- AAFCO/Kansas State – Olathe New Feed Ingredient Definition Program.
- FDA Acceptance of AAFCO-Defined Feed Ingredients Post-2024 Official Publication
- FDA Animal Food Ingredient Consultation (AFIC) Process
- Pet Food Regulatory Reform Act of 2025 (PURR Act)
- Innovative Feed Enhancement and Economic Development (IFEED) Act
- New Administration’s push for transparency in food (RFK Jr): Potential GRAS Bill being developed that could impact human and animal food
- Avian Influenza: Cat and Dog Food Manufacturers Required to re-evaluate food safety plans due to viral transmission in raw dog/cat food

II. Committee Activities

A. Feed Committee drafted several public comment letters on several changes between AAFCO and FDA: NGFA Feed Committee worked on several public comment letters concerning AAFCO’s proposed ingredient definition process and FDA draft and interim guidance for industry as the AAFCO/FDA MOU expired in October 2024.

- NGFA submitted comments on Oct. 31 concerning AAFCO’s proposed ingredient definition process that would utilize K-State Olathe. NGFA generally supports the new proposed program, but its value hinges on acceptance of the ingredients approved through the program by all states and FDA. AAFCO membership voted to proceed with the program at the 2025 AAFCO Midyear Meeting.
- NGFA submitted comments on Sept. 9 concerning FDA’s draft guidance for industry #293 entitled, “FDA Enforcement Policy for AAFCO-Defined Animal Feed Ingredients,” that outlined FDA’s enforcement policy regarding ingredients listed in chapter six of the 2024 AAFCO Official Publication. NGFA supports FDA’s intent to exercise enforcement discretions towards the interstate marketing and use of listed ingredients.

- NGFA submitted comments on Sept. 9 concerning FDA's interim Animal Food Ingredient Consultation (AFIC). NGFA supports the use of the interim process that largely mirrors the AAFCO feed ingredient definition process as FDA considers ways to potentially streamline its animal Food Additive Petition (FAP) and Generally Recognized as Safe (GRAS) Notification Programs.
- NGFA submitted comments on Dec. 9 that contained recommendations on how FDA could improve efficiencies with their animal FAP and GRAS programs. In general, NGFA stated that FDA's requirements for data and information are excessive and are a barrier to the use of the programs.
- These comments were also provided to Policy Staffers in February of 2025 as they investigate a GRAS bill focused primarily on human food.

B. Fall In-Person Feed Committee Meeting: In September, the Feed Committee met to discuss several of the above issues. Recently, members have expressed interest in NGFA facilitating forums to discuss best practices related to feed safety and operational issues.

C. AAFCO Mid-Year Meeting: Members of the Committee and NGFA staff serve as industry advisers to AAFCO and participated within the Association's 2025 Mid-Year Annual Meeting conducted January 21-23, 2025 in Little Rock, Arkansas. Items discussed:

- AAFCO Membership voted to accept the KSO Proposal to provide the scientific review for a new animal food ingredient submission pathway.
- AAFCO Work Groups Created: A work group will be created to draft language to address FDA's AFIC as well as the KSO AAFCO pathway in the AAFCO OP. A work group was created to discuss a Known Hazard Guide for inspectors.
- Labeling definition was accepted by Feed Labeling and Pet Food committees and moves to the AAFCO Board.
- Unique Identifiers on feed labels was passed by the Model Bills and Regulations committee.

III. Issues for Discussion

- **PURR Act and Potential GRAS Bill:** PURR Act would delineate regulatory oversight between pet foods (FDA) and livestock animal food (State and FDA). Last year, NGFA did not take a stance on this issue, but generally did not support it. With the potential of a GRAS bill being introduced, should NGFA take a clearer position on either of these?

IV. Other Actions:

- A.** NGFA will participate on the AAFCO – KSO Steering Committee to oversee the development of some of the procedures and the submission process. AAFCO anticipates this process to be operational by Fall of 2025.
- B.** The Feed Committee will continue to explore the best avenue for NGFA to facilitate forums to discuss best practices related to feed safety and operational issues
- C.** Advised the Feed Trade Rules Subcommittee on potential updates to the Trade Rules due to changes in AAFCO.
- D.** Animal Food Preventive Controls Course: NGFA partnered with Kansas State University on November 5-7, 2024 to deliver the Food Safety Preventive Controls Alliance (FSPCA) Preventive Controls for Animal Food Course to educate attendees about FDA feed safety requirements. NGFA will continue to lead this course in April, August, and November of 2025. Dates and registration details are available on NGFA Website under events.