AAFCO
Association of American Feed Control Officials

Fall Regulatory Updates

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AAFCO
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- Non-Profit Organization - 501c5
- Formed in 1909
- Voluntary membership organization of the states in the US and Federal government, as well as government agencies in other countries, responsible for the execution of laws and regulations pertaining to the production, labeling, distribution, use, or sale of animal food and ingredients.
- AAFCO provides a public forum where regulators, industry representatives, and consumers can:
  - Meet in partnership to discuss problems in administering and enforcing state feed laws
  - Meet to identify and discuss emerging issues across the country
  - Study problems, develop strategies, and
  - Provide guidance and outreach

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Association Work

- Model Bill & Regulations
- Guidance
- Advocacy
- Dog/Cat Nutritional Standards
- Proficiency Testing Program
- Training
- AAFCO Official Publication

What Happened This Year

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New Ingredients

- FAP's
  - Zinc-L-Selenomethionine Complex
    - *Broiler chickens*
- AGRN's
  - Synthetic sodium aluminosilicate
    - *Dairy cattle*
  - Xylooligosaccharides
    - *Swine, Poultry, & Fish*
  - Lytic Bacteriophage Preparation
    - *Pets*
  - Tagetes (Aztec marigold) Extract
    - *Dogs & Cats*
  - Condensed Algal Residue Solubles (CARS)
    - *Beef Cattle*
  - Beta-Mannanase
    - *Swine*
- AFIC
  - Rice Protein Concentrate
    - *Dogs & Cats*
- AAFCO
  - Fish
  - Pomegranate Pomace
    - *Dog food*
  - Black Soldier Fly Larvae Oil (aquaculture)
  - Dried Black Soldier Fly Larvae (aquaculture)
  - Meat Meal (Ash Max)
  - Serine Endopeptidase Enzyme Preparation
  - Grass Derived Alkali Lignin
    - *Ruminant, Swine, & Chicken*
- Modified AAFCO Terms
  - Natural (other organisms)

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Calcium & Phosphorus Updates

- Based on the Expert Panel on P and Ca in Cat Food that was submitted early in 2025
  - About > Committees > Pet Food Committee > Library of Resources
- Established a maximum content of 5g P/1000 kcal ME in the AAFCO Cat Food Nutrient Profiles, with 1g P/1000 kcal ME coming from highly soluble phosphates
- Established a minimum Ca:P ratio of 1:1 in the AAFCO Cat Food Nutrient Profiles
- Added a new footnote in the Mineral Products section:

> *"(+) 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."*
>
> *Applies to P-containing minerals that are ≥ 80% soluble in water after 1 minute of exposure (e.g., Disodium Phosphate, Monosodium Phosphate, Phosphoric Acid, Sodium Hexametaphosphate, Sodium Tripolyphosphate, Tribasic Sodium Phosphate and Sodium Acid Pyrophosphate)*

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Calcium & Phosphorus Updates

- New Enforcement Discretion Policy Related to Feline Calcium and Phosphorus Nutritional Profile Updates
  - www.aafco.org > Advocacy > AAFCO Policies

AAFCO recommends that regulatory programs refrain from taking enforcement action against products that do not immediately comply with the revised feline calcium and phosphorus requirements during the implementation period established under AAFCO's policy on enforcement discretion related to Pet Food Label Modernization (PFLM)

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Pet Food Label Modernization Updates

- www.aafco.org > Advocacy > AAFCO Policies
- www.aafco.org/pflm

- Started in 2015, passed in 2023, printed in the 2024 AAFCO OP with an enforcement discretion recommendation to 2030.
  - Pet Nutrition Facts Box, requirements for a new intended use statement on the bottom third of the PDP, requirements to list total carbohydrates and dietary fiber. Voluntary safe handling instructions, etc.

- This year's survey:
  - 9 have adopted and 13 states are working on the adoption process
  - 36 states reported seeing new labels in the market

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Pre-Market Ingredient Program Updates

- FDA's Newly Proposed GRAS Rule (8/11/26):
  - Since 1958, manufacturers have been permitted to conclude that substances are generally recognized as safe under their intended conditions of use.
  - The FD&C Act establishes two legal routes for new ingredients to gain approval in the U.S.; FDA's FAP process and the GRAS notice program.
    - Notification to FDA under the current GRAS notice program is optional
    - State GRAS acceptance, AAFCO Table 101.1

Key Takeaways

- The new rule would transform FDA's longstanding voluntary notification program into a mandatory reporting system.
- Does not establish a premarket review requirement
- The proposed rule also outlines a streamlined notification window
- Docket No. FDA-2025-N-3262 is open until Dec. 9th, 2026

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More Pre-Market Ingredient Program Updates

- September 22, 2026
  - FDA concluded their Evaluation of Pre-market Animal Food Ingredient Review Programs and Shared Vision for the Future
    - The review included soliciting public comments, conducting 14 external engagement sessions, holding internal CVM staff interviews, and analyzing feedback across program areas.
    - FDA Issued a Summary document that can be found online.

- Key Takeaways:
  - FDA is making disclosure requirements clearer and easier to understand.
  - Updated internal best practices to improve consistency and reduce reviewer burden.
  - Implemented earlier internal review timelines
  - Created a second amendment opportunity within the GRAS evaluation process
  - Published a new Policy and Procedures Manual (PPM 1244.3425)
  - Expanded data flexibility
  - Advanced internal harmonization through collaboration with ICCF

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Other FDA Updates...

- 2026 Food Facility Biennial Registration Renewal
  - Section 415 of the FD &C Act requires food facilities that are required to register with FDA to renew such registrations during the period beginning on Oct. 1 and ending on Dec. 31 of each **even-numbered year**.

- FDA "Simple Reform" Reorganization Plan – announced July 2026
  - FDA consolidated and streamlined many administrative functions
  - The Animal Food program was historically concentrated within CVM's Office of Surveillance and Compliance (OSC), with simple reform OSC was split into two separate offices.
    - The new Office of Veterinary Product Surveillance and Compliance
    - The new Office of Animal Foods (OAF)
  - CVM also dissolved the Office of Applied Science

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Looking Ahead

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Moving into 2027…

- Innovative Feed Act language
  - In Sept., the Senate Agriculture Committee advanced the Agricultural Act of 2026, or Farm Bill 2.0.
  - This language would update FDA's review process for certain animal food ingredients, including ingredients intended to provide benefits beyond taste, nutrition or aroma.
  - The House passed its Farm Bill on April 30th
- PURR Act language – H.R.8646
- FDA to publish a Final GRAS rule?
- Animal Health Supplement bill - NASC

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Moving into 2027…

- AAFCO
  - Ingredients & Terms up for a vote in January:
    - Nonanoic Acid
    - Hydroxypropyl Cellulose
    - Calcium Salts of Isobutyric Acid and 2-Methylbutyric Acid
    - Chromium DL-Methionine chelate
    - Chromium Propionate (laying hens, breeder chickens)
    - Yeast Culture
    - Nomenclature changes for Direct Fed Microbials
    - High Pressure Processing (HPP)
  - Terms to discuss – Raw?

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Moving into 2027…

- More AAFCO Initiatives:

Label Review Program

- Considering a pilot program for 2027 that would include free review for up to 300 products (limit per company)
- After the pilot program we would transition to a fee-based system.



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Moving into 2027…

- More AAFCO Initiatives:

Ingredient Certification Program

- Voluntary audit scheme to give added value to ingredients that have been inspected and shown to meet the AAFCO definitions and other food safety requirements.



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Moving into 2027…

- More AAFCO Initiatives:

Laboratory Certification Program

- Voluntary audit scheme to give added value to laboratories that participate in AAFCO's Proficiency Testing Program (PTP) and want to go a step further to demonstrate a high level of competency.

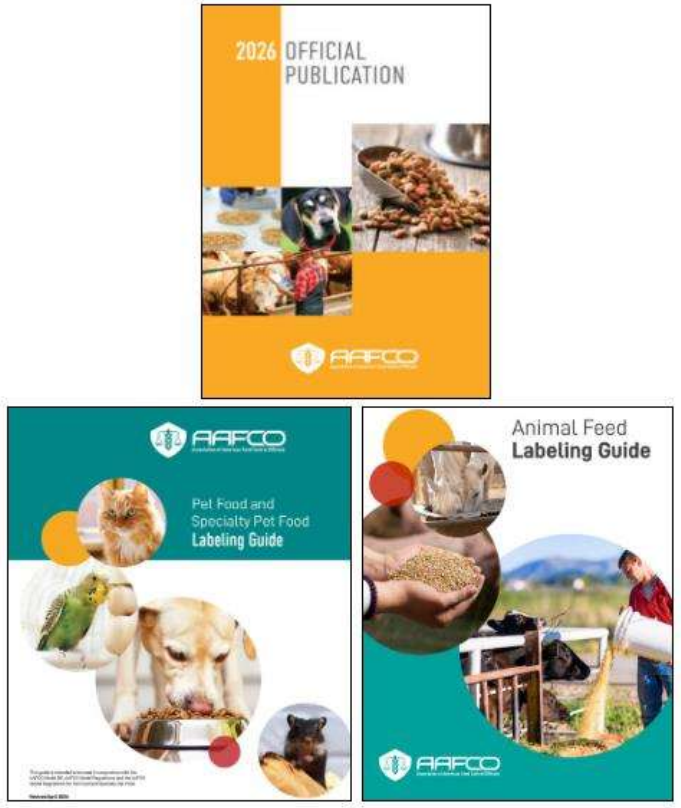


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AAFCO Resources

- AAFCO Official Publication
- AAFCO Pet Food & Feed Labeling Guides
- AVA (AAFCO Virtual Assistant)

https://www.aafco.org/resources/publications/





January 12-14, 2027 • Lake Buena Vista, Florida / Disney World

Questions?

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