

# DRAFT

## AAFCO Recommended Enforcement Strategy

for Unapproved Ingredients and  
Ingredients with  
Unapproved Claims

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Developed by the AAFCO  
ESMI Working Group

# AAFCO Enforcement Strategy

- **Purpose**

- An increasing number of feed and pet food ingredients are being distributed that are unapproved and undefined, as well as ingredients that are approved but distributed for unapproved purposes.

# AAFCO Enforcement Strategy

- With growing concerns about consumer protection, protection of animal health, and food safety, the AAFCO Board of Directors formed the Enforcement Strategy for Marketed Ingredients (ESMI) Working Group in December 2000.

# AAFCO Enforcement Strategy

- The ESMI Working Group was formed to encourage and facilitate compliance of animal feeds with state and federal laws by developing an enforcement strategy that is recommended to the AAFCO membership.

# AAFCO Enforcement Strategy

- To achieve the desired goals of this enforcement strategy, **a uniform enforcement event**, coordinated by AAFCO and the United States Food and Drug Administration (FDA), is planned to target unsafe, unapproved ingredients that are distributed in all channels of commerce, including catalogs and the Internet.

# AAFCO Enforcement Strategy

- Feed regulatory officials are encouraged to implement this enforcement strategy during the planned uniform enforcement event, but it is important to note that this enforcement strategy may be used to regulate any unapproved ingredient that is marketed illegally.

# AAFCO Enforcement Strategy

- This enforcement strategy is not intended to replace or minimize existing regulatory programs, but rather should be considered as an enforcement tool to enhance and supplement those regulatory activities already in place.

# AAFCO Enforcement Strategy

- **AAFCO Regulatory Philosophy**

- The goals of the AAFCO recommended enforcement strategy follow the AAFCO Regulatory Philosophy, found on page 68 of the AAFCO 2001 Official Publication.

# AAFCO Enforcement Strategy

- The major aspects of the AAFCO Regulatory Philosophy are:
  - Provide protection for the consumer as well as the regulated industry;
  - Safeguard the health of man and animals; and
  - Provide a structure for orderly commerce.

# AAFCO Enforcement Strategy

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- **Goals**

- The goals of this enforcement strategy are:

# AAFCO Enforcement Strategy

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- Goal 1

- Increased consumer awareness.

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- Goal 2
  - Minimized availability of unapproved feed ingredients.

# AAFCO Enforcement Strategy

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- Goal 3
  - A uniform regulatory approach for animal feeds.

# AAFCO Enforcement Strategy

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- Goal 4
  - Assessment of the success of the enforcement strategy.

# AAFCO Enforcement Strategy

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- Goal 5

- A level playing field with fair competition among the feed industry.

# AAFCO Enforcement Strategy

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- **Strategies and Activities to Accomplish Goals**

# AAFCO Enforcement Strategy

- To achieve these goals, the following enforcement strategies are developed that can be applied to the regulation of unapproved feed ingredients or products that contain unapproved ingredients:

# Goal 1: Increased Consumer Awareness

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- Strategy:
  - Educate the consumer about the regulatory process for the distribution of animal feed ingredients.

## Strategy: Educate the Consumer

- Activity

- Provide information to the consumer such as:

- AAFCO Q & A Document
    - AAFCO ESMI WebPage Article

## Goal 2: Minimized Availability of Unapproved Feed Ingredients

- Strategy 1

- Identify ingredients or categories of products with priority given to concerns about food safety, animal health, and consumer fraud.

## Strategy 1: Identify Ingredients or Categories of Products

- **Activity**

- Gather information from published, reputable sources about the status of animal feed ingredients that are distributed in the marketplace.

## Strategy 1: Identify Ingredients or Categories of Products

- Activity cont'd:
  - Such sources of information are:
    - AAFCO Meetings and Workshops
    - Participation in Surf Day and Other Surveillance Activities

## Strategy 1: Identify ingredients or categories of products

- Sources of Information cont'd:
  - Referrals/complaints from consumers, state/federal agencies, other countries (i.e., Canada)

## Strategy 1: Identify Ingredients or Categories of Products

- Sources of Information cont'd:
  - AAFCO WebPage, including:
    - Ingredient Fact Sheet
    - WebPage Articles
    - AAFCO Members Only Secure Section
    - FDA Advisories

## Goal 2: Minimized Availability of Unapproved Feed Ingredients

- Strategy 2
  - Educate industry about the regulatory process for the distribution of animal feed ingredients.

## Strategy 2: Educate Industry

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- Activity

- Provide information to industry about the approval process for animal feed ingredients.

## Strategy 2: Educate Industry

- Such educational information includes:
  - AAFCO Ingredient Fact Sheet
  - AAFCO WebPage Articles
  - AAFCO Meetings
  - Workshops (AAFCO & FDA)
  - Presentations at Industry Events

## Goal 2: Minimized Availability of Unapproved Feed Ingredients

- Strategy 3

- Notify industry that the regulatory process for the distribution has changed as appropriate for target ingredient.

## Strategy 3: Notify Industry

- Activity

- Distribute information to the feed industry such as:

- Advisory Letters

- Press Releases

- AAFCO WebPage Articles

## Goal 3: A Uniform Regulatory Approach for Animal Feeds

- **Strategy**

- Rectify the problem of unapproved ingredients/products and claims in the marketplace.

# Strategy: Rectify the Problem

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- Activity
  - Implement the AAFCO recommended enforcement strategy.
  - Participate in the AAFCO planned enforcement event for a target ingredient.

## Goal 4: Assessment of the Success of the Enforcement Strategy

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- Strategy

- Assess and verify the effectiveness of the uniform regulatory event and the enforcement strategy.

## Strategy: Assess and Verify

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- Activity

- Review the assessment questionnaire.
- Re-inspect the marketplace.

## Goal 5: A Level Playing Field with Fair Competition Among the Feed Industry

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- **Strategy**

- Remove unapproved ingredients, products and claims from the marketplace.

# Strategy: Remove Unapproved Ingredients, Products and Claims

- Activity

- Implement the AAFCO recommended enforcement strategy.
- Participate in the AAFCO planned enforcement event for a target ingredient.
- Monitor the marketplace for unapproved ingredients, products and claims.

# AAFCO Enforcement Strategy

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- Questions?