

AAFCO Guidelines on Hemp in Animal Food

March 5, 2017

For more information visit the aafco.org website.

Ingredients used in animal food (pet, livestock, and poultry) in the United States undergo a scientific review prior to being allowed for sale or distribution. The most comprehensive list of ingredients defined for animal food use is found in the Association of American Feed Control Officials *Official Publication* (AAFCO OP). Ingredient definitions and their common name come into the OP through one of three routes. They can be the subject of a Food Additive Petition to the FDA (FAP); receive a letter of no questions from the FDA to a generally recognized as safe (GRAS) notification (new—subject to membership approval); or the most popular route, be requested of AAFCO. Each of these routes has some level of a safety and utility review done by the FDA/CVM. States and others then rely on the AAFCO OP to allow feeds to be made with defined ingredients. The common ingredient name established by AAFCO is reflected in the feed's ingredient statement. The FDA and a few states also recognize self-conclusions by firms of GRAS for an intended use.

Hemp production is increasing in the United States. In 2015 AAFCO asked the hemp industry to come forward and present information for the scientific review to establish definitions for animal foods made from the hemp plant. We expected information on hemp seed oil, hemp seed meal, and whole hemp seeds. To date, the industry has not provided any data showing that ingredients derived from the hemp plant are safe and useful in animal food. AAFCO is encouraging the industry to submit their data promptly. Regulatory members continue to ask for the information prior to distribution of hemp seed products in their state. To allow an entire industry to enter the market without the appropriate safety data is unfair to other ingredient manufacturers that are doing their due diligence. There are some potential safety concerns related to the presence of certain compounds, including THC (tetrahydrocannabinol) and CBD (cannabidiol), in parts of the hemp plant that must be addressed.

One thing has become clear as we have had discussions with the hemp industry, materials and products that are CBD infused need to be treated as drugs. There is no nutritional intended use for this compound. This means that several parts of the hemp plant will not be appropriate for animal feeding.

Quoting from the FDA and Marijuana website: “FDA has therefore concluded that it is a prohibited act to introduce or deliver for introduction into interstate commerce any food (including any animal food or feed) to which cannabidiol has been added.”

For further information:

AAFCO Ingredient Definition Process:

<http://www.aafco.org/Regulatory/Committees/Ingredient-Definitions>

AAFCO Hemp Seed Oil Investigator: brett.boswell@state.mn.us

AAFCO Hemp Seed Meal, Whole Hemp Seed Investigator: bchurch@mt.gov

FDA Food Additive Petitions:

<http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm056809.htm>

FDA GRAS Notification:

<http://www.fda.gov/AnimalVeterinary/Products/AnimalFoodFeeds/GenerallyRecognizedasSafeGRASNotifications/default.htm>

FDA and Marijuana: Questions and Answers

<http://www.fda.gov/NewsEvents/PublicHealthFocus/ucm421168.htm#dietsuppsexclude>

DEA Announces Actions Related to Marijuana and Industrial Hemp

http://www.oisc.purdue.edu/seed/hemp/dea_cannabis.pdf

DEA Eases Requirements for FDA-Approved Clinical Trials on Cannabidiol

http://www.oisc.purdue.edu/seed/hemp/dea_cbd_research.pdf