October 29, 2024

K-State Olathe Proposal Comments

The National Hemp Growers Association represents Hemp Farmers from across the US who need new markets for hemp grain and its processing by-products. We have unique experience with staff and Board members that have been engaged with gaining federal and state feed approvals. We support the work that State Departments of Agriculture and its regulators do for farmers, manufacturers, feed formulators and livestock producers to ensure safe feed and thereby safe animal by-products for human consumption. We are also concerned that the current requests for public comment about the current FDA-CVM Generally Recognized as Safe (GRAS) and Feed Additive Petition (FAP) means that the opportunity to open feed markets for hemp could become more cumbersome and take more time than it already does.

NHGA would like to first strongly support the creation of an AAFCO Ingredient Definition approval process and the efforts that are being made to shorten the length of time that it takes to gain these approvals. We also applaud the direct engagement of researchers and experts with a notable emphasis on recruiting experts with knowledge in bringing products to market and we hope a focus on sustainable and novel feed solutions will also be supported by engaging emerging professionals and graduate researchers.

We do have a number of questions about the proposed process and would like your consideration in further development.

Expert Panel Recommendations and Selection

1. Is the submitter able to request specific subject matter expertise be included?
   For example; if the submission would benefit from an analytical chemist with knowledge of current limits, methods and equipment, is the submitter able to make a request for their inclusion.
2. Will processing and value chain expertise be included as part of the expert panel?

Request and Response timeline

3. The expert review committee will provide feedback in 60-90 days. Will this mimic the FDA-CVM process where the submitter has 60-90 days to respond and will continue with a back and forth as the application progresses?

Data and Designation

4. We notice the close collaboration with the Canadian Food Inspection Agency. Will the review committee accept data from international researchers if it has been peer-reviewed and published?
5. For a multi-species application will this be considered as an all or none; or if one species requires additional data will it stop the progression of the others through the approval process?
6. Will animals that produce both milk and meat or both eggs and meat be considered a single species?

NHGA and many of our constituents are concerned that the cost may prohibit small formulators and operators from pursuing new Ingredient definitions; however, when compared to the averages of four years and $350,000 for a successful FDA-CVM approval, we are accepting of the costs. The engagement of graduate and student researchers to conduct additional research may create opportunities for grants and fundraising to benefit the program and producers, and we hope this can be considered. Additionally, the opportunity to present the submission by species rather than category saves industry time and money which helps to justify the price tag of $15,000-$50,000. In closing, we would like to repeat our support and enthusiasm for the creation of an AAFCO and K-State partnership to provide the feed industry and livestock producers a faster and scientifically based pathway to gain new and novel feed ingredient approvals.

Thank you for your consideration,

National Hemp Growers Association