



Joint Open Letter of Concern over the Allowance of Hemp in Animal Feed

Support Education and Research to Ensure Safe Use of Hemp as an Ingredient

February 9, 2022

To Agricultural Leaders and State Policymakers,

We deeply value your work and commitment as leaders and decision makers in agriculture, and we are writing this letter to seek your support for greater education and research on a topic that impacts agricultural regulation and production, as well as the safety and well-being of your constituents.

As leading organizations for the advancement of livestock production, pet nutrition, veterinary services, laboratory research, animal feed manufacturing, and public health, the undersigned wish to share our unified concerns regarding the current interest in using hemp, including its derivatives and by-products (herein collectively referred to as "hemp"), in animal feed. It is our position that sufficient scientific research to support the safety and utility of hemp in animal feed must be completed prior to any Federal or state approval.

We understand the importance of supporting the hemp industry, and yet we also believe it is simply too soon to know whether hemp is safe for farm and ranch animals, as well as for our pets. Our goal is for more research to ensure the safety and well-being of the public, our animals and our agricultural industry.

Scientific research is needed.

Interest in the use of hemp in commercial animal feed has accelerated since the passage of the 2018 Agricultural Improvement Act ("Farm Bill"). While the Farm Bill expanded the legal *production* of hemp in the United States, the use of hemp in animal feed remains under the jurisdiction of the U.S. Food and Drug Administration (FDA) and state regulatory programs for commercial animal feed. However, many state leaders and lawmakers are being asked to circumvent Federal and state oversight by considering legislation that will allow the use of hemp in animal feed in their respective states before the completion of the critical scientific research to affirm the safety of hemp -- and before the necessary review by the FDA.

Safety mechanisms and procedures are critical.

Every day, Americans purchase food for their livestock and companion animals with the reasonable expectation that it is safe, and that the nutritional benefits claimed on the label are supported. While consumers have this expectation, most are unaware of the scientific research and regulatory reviews that are in place to affirm the safety of animal feed ingredients. Those safety mechanisms have been in place for decades and ensure the safety of both animal feeds and the meat, milk, and eggs from those animals that are intended for human consumption. Currently, no hemp ingredients have been approved through the established animal feed ingredient review pathways. It would be imprudent to bypass these established procedures needed to protect both human and animal health and unilaterally legislate approval of animal feed ingredients at the state level.

Concerns should be addressed.

We are concerned that state leaders and the general public may not be fully aware that any new ingredient intended for animal feed must go through a scientific and legal review process to ensure safety and utility. Therefore, we wish to highlight three specific concerns regarding the inclusion of hemp in animal feed prior to the necessary research and regulatory review: 1) animal health and safety; 2) safety of food from production animals entering the human food chain; and 3) adverse impact to farmers, ranchers, and the animal feed industry.



1) Concerns about the health and safety of livestock and companion animals

Although research is underway, it is limited and not conclusive. Some parts of the hemp plant have the potential to serve as sources of nutrition in many animal diets. However, it is not yet clear whether animals fed hemp-based diets will perform similarly to animals fed traditional diets that farmers and ranchers depend on today. Even hemp that is compliant with existing regulations for production contains Δ9-THC (<0.3%) and other cannabinoids. There is not a conclusive understanding of the long-term impacts of these compounds on the health of animals and results of existing research raise safety concerns. To achieve approval for use in animal feed, scientific evidence supporting long-term safety and utility is needed before commercial use.

2) Concerns about consumer safety from food produced by animals fed hemp

A definitive scientific understanding of the transfer rate of THC, CBD, and other cannabinoids into the meat, milk, and eggs of food-producing animals has yet to be obtained, and the laboratory methods needed to detect these compounds are still under development. To achieve approval, scientific evidence of appropriate limits needs to be established to protect consumers from unwanted exposure to cannabinoids. Consumer safety is especially important with respect to the possibility of any cannabis exceeding 0.3% total Δ9-THC making its way into feed.

3) Concerns about legal implications for animal producers and feed manufacturers

Even if a state legalizes hemp for use in animal feed, the use of the ingredient is not yet approved at the Federal level. Animal feed containing hemp, as well as human food produced from animals fed hemp, that crosses state lines is subject to Federal regulation and could be considered adulterated under the law. The pursuit of review through established processes will effectively address all state and Federal regulatory requirements, granting access to local, national, and global markets. Without Federal review, the access for producers and manufacturers to interstate and global markets can be negatively impacted.

Recommended actions are doable and achievable.

Instead of initiating statutory or administrative approval of hemp in animal feed at the state level, we collectively recommend that state leaders and proponents of hemp in feed work through the defined regulatory pathways used for every animal feed ingredient. We urge state leaders to support research through universities or private labs so that the safety and utility of hemp can be fully understood before it is allowed for commercial purposes. We encourage proponents to continue to assemble data, and to work on submitting applications through the established animal feed ingredient review process. AAFCO is committed to working with any organization to submit an application for Federal review.

Dialog is essential.

Please support education and research around hemp. Please consult your state feed control official for more information on this topic. If you have other questions or ideas, please contact the Association of American Feed Control Officials (aafco@aafco.org) to continue this important dialog.

Signed by:

Association of American Feed Control Officials
Association of Food and Drug Officials
Association of Public Health Laboratories
Academy of Veterinary Consultants
American Academy of Veterinary Nutrition
American Association of Bovine Practitioners
American Dairy Science Association
American Feed Industry Association
American Horse Council

American Veterinary Medical Association
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National Animal Supplement Council
National Cattlemen's Beef Association
National Grain and Feed Association
National Pork Producers Council
Nutrition Specialty of the American College of Veterinary Internal Medicine
Pet Food Institute