



Hemp and Hemp Byproducts in Animal Food

AAFCO Position and Call to Action

As an organization that has been guiding state, federal and international feed regulators for more than 110 years, while supporting the health and safety of people and animals, the Association of American Feed Control Officials ([AAFCO](#)) would like to provide an update on its position on [the use of hemp and hemp byproducts in animal food](#). New information and details on an industrywide call to action are outlined below.

Hemp Byproducts and the Farm Bill

The emergence of animal food with hemp byproducts in the marketplace has accelerated with the passage of the 2018 Agricultural Improvement Act, commonly referred to as the “Farm Bill.” While the 2018 Farm Bill expanded the legal *production of hemp* in the United States, the *use of hemp* and its byproducts in animal food fall under the jurisdiction of the Food and Drug Administration (FDA). In addition, lawmakers are being lobbied to consider legislation allowing the use of hemp in feed ingredients.

AAFCO’s Position for Further Research

As an association of animal food regulators, AAFCO strives to develop a model framework that supports the health and safety of livestock and companion animals through regulatory consistency for commercial animal food across the United States. In partnership with FDA, a scientific review on the safety and efficacy of ingredient definitions is just one of the ways AAFCO accomplishes that goal.

While AAFCO understands the interest to support the new hemp industry, AAFCO strongly encourages agricultural leaders, lawmakers and industry members to consider the potential adverse impact of allowing hemp in animal food prior to completing the necessary research and legal approval process that will demonstrate the safety and efficacy of this ingredient. Rather than unilaterally approving the use of hemp as a feed ingredient, in conflict with AAFCO's century-old model for animal food ingredient approval, advocates should support continued research and development, and promptly submit applications to AAFCO and the FDA for review and approval on a national level.

In order for any ingredient to be used in animal food, thorough scientific research must be completed to ensure safety and nutritional benefits. Allowance of hemp byproducts prior to an appropriate scientific review and approval process can result in serious adverse effects that need to be considered, including the following:

1. **Impact on the health and safety of livestock and pets.** Research has not been definitively completed to demonstrate that hemp can be safely fed to all animal species. Some work has been completed to explore if hemp can effectively replace other ingredients in some animal diets, but more research is needed.
2. **Impact on the safety of food from food-producing animals.** While research is currently underway, there has yet to be a definitive scientific understanding of the transfer rate of THC, CBD, and other cannabinoids into meat, milk, and eggs. Consumers continue to be conscious that the food they purchase is free of residual drugs that were provided to the animals during production. Consumers should have reasonable expectations that the food their family is consuming is free of any residual levels of THC or CBD. As of now, the research and regulatory structure needed to provide that level of certainty to consumers do not exist. Again, more research is needed.
3. **Impact on farmers, ranchers, and feed manufacture risking and violating federal laws.** It is important to point out that even if a state legalizes hemp or hemp byproducts for use in animal food, the use of the ingredients is still illegal at the Federal level. While animal food in each state is regulated by the laws of that state, animal food in interstate commerce is subject to Federal regulation. Effectively, nearly all regulatory barriers can be addressed through the pursuit of AAFCO ingredient definitions for hemp and hemp byproducts desired for use in animal food.
4. **Impact on ranching and dairy access to interstate commerce, international markets, and market access.** The consequences of interstate commerce and global export of livestock or feed using hemp byproducts need to be considered prior to any legislation. For example, the allowance of hemp in livestock prior to it becoming an approved ingredient could result in trade barriers or affect the reciprocity of feed and livestock between states. Moreover, the use of hemp byproducts may close market opportunities for ranchers and dairies, with stockers and suppliers unwilling to accept the risk of purchasing products from operations that feed their animals hemp byproducts prior to Federal approval.

Call to Action

Since 2015, AAFCO has been asking the hemp industry to come forward and present information for the scientific review to establish definitions for animal foods made with all or part of the industrial hemp plant. The requested data would help address the safety of both the target animals and the resultant human food. AAFCO expects to see ingredients like hemp seed oil, hemp seed meal, and whole hemp seeds. To date, the industry has submitted data related to the use of hempseed cake in laying hens; the data is under review as of September 2021. We strongly encourage additional applications for other species.

Instead of supporting legal or administrative changes at the state level, AAFCO is advocating that lawmakers and proponents of hemp in feed continue to work on AAFCO ingredient definitions. The scientific information and data that demonstrate the safety of the desired hemp or hemp byproduct ingredient are critical to protecting public

health. Moreover, AAFCO encourages lawmakers to work with key stakeholders, such as FDA, USDA, National Association of State Departments of Agriculture, livestock and dairy associations, consumer advocacy groups, and AAFCO to develop a path forward in which hemp byproducts can be legally approved and used.

Additional Information

Please contact aafoo@aafoo.org, if you have questions or would like more information. In the meantime, please review the AAFCO Guidelines on Hemp in Animal Food by [clicking here](#). Links to additional resources are also included on page 4 of the Guidelines document.

(Rev. 9/2021)