

**MINUTES  
PET FOOD COMMITTEE  
AAFCO 2007 MIDYEAR MEETING  
Savannah, Georgia  
Wednesday, January 17, 2007  
3:30 –5:00 PM**

**1. Introductions**

Chair Dave Syverson called the meeting to order at 3:45 pm. The following committee members and advisors were present:

**Committee Members**

Dave Syverson, MN, Chair  
Teresa Crenshaw, DE  
Dr. Rod Noel, IN  
Lynn Sheridan, WA

**Industry Advisors**

Richard Sellers, AFIA  
Jason Vickers, AFIA  
Nancy Cook, PFI  
Dr. Angele Thompson, PFI  
Dr. David Dzanis, ACVN  
David Fairfield, NGFA  
Jan Campbell, NGFA

Dr. Bill Burkholder, FDA-CVM, was present by phone.

**2. Committee Organization Update and Changes**

Dave Syverson introduced and welcomed new Pet Food Committee member Lynn Sheridan who is with the Washington State Department of Agriculture.

Dave Syverson referred to the AAFCO Committee guidelines for bringing business before the committee and how committee business should be conducted. Richard Sellers noted that the National Fishmeal and Oil Association no longer exists and is now the National Fisheries Institute.

**3. Corrections to the Agenda**

Dave Syverson noted additions to the agenda to include discussion on Regulation PF10 and Policy Statement 27.

**4. NRC – Nutrient Requirements of Cats and Dogs**

Dr. Bill Burkholder announced members of the Expert Canine and Feline Nutrition SubCommittee. He discussed how the group would proceed to bring recommendations to the Pet Food Committee. Dr. Burkholder asked the members of the subcommittee to provide him with their E-mail addresses.

**5. ACVN Proposal**

Dave Syverson reviewed the proposed changes to Regulation PF 9 to require calorie statements on all pet food labels. He then reviewed the list of comments that had been received about the proposal. Nancy Cook and Angele Thompson indicated that PFI's white paper had not changed but their latest submission to the committee was considered to be a new document.

Dave Syverson read the comments from the AVMA Executive Board indicating their support of the ACVN proposal. Nancy Cook asked Dave Syverson to also review the white paper from PFI. Dave Syverson read the document "Mandatory Calorie Declarations". He also read the submission from Dr. Sean J. Delaney with DVM Consulting regarding the "Balance IT" online software. Dave Syverson provided informal comments from AAFCO members who supported the proposal, but he also noted that some control officials were concerned about the additional time that would be necessary for them to regulate calorie statements. Some officials had commented that perhaps calorie statements should be required only on complete and balanced products, but not for pet treats. Some also noted concerns about how difficult it would be for smaller companies to meet the calorie statement requirements.

Dr. Gail Kuhlman presented comments from the PFI Nutrition Task Force that had previously been submitted in writing to the Pet Food Committee. She explained that PFI felt the ACVN proposal did not meet the guidelines for bringing proposals to AAFCO committees. Dr. Kuhlman also noted PFI's support for a task force to address this issue.

Dave Syverson noted that the Pet Food Committee had already addressed the AAFCO committee guidelines and agreed that the ACVN proposal does meet these requirements. The proposal will therefore continue on the agenda. Dave Syverson opened up the issue for discussion from the committee advisors.

Dr. David Dzanis noted the endorsement by the AVMA that is the largest organization of 74,000 veterinarians who support the need for calorie statements. Dr. Dzanis read a statement from the ACVN entitled "Comments on proposed amendment to AAFCO Model Pet Food Regulation PF9." Dr. Dzanis also noted that there would not be an additional burden on the control official since the level of regulatory responsibility would be at the state's discretion. Small companies already have similar leeway under FDA's small company exemption, but it should not be that much more difficult for a company to meet these requirements. Calorie statements are not a guarantee but rather a statement of calorie content. Dr. Dzanis noted again that the proposal does provide for orderly commerce that is one of the criteria of the AAFCO committee guidelines.

Dave Syverson asked for comments from the floor. It was stated that APPMA strongly opposes the ACVN proposal, and APPMA's members support the white paper from PFI. APPMA members who are small companies will challenge the ability to comply. Rod asked that the committee consider exemptions for small

startup companies. Richard Sellers stated that AFIA also supports the PFI white paper. He noted that the entire industry is opposed to the proposal, and he said that there would be a significant cost to implement this proposal. Richard asked the committee to poll the states to see which ones would actually adopt the proposal.

Jan Campbell said that NGFA also supports PFI's white paper. A representative from the National Renderers Association also supports PFI's white paper and opposes additional regulation. Dr. Dzanis responded that several individual companies support the proposal but were reluctant to come forward. The calorie statement proposal is similar to the discussion about descriptive terms over ten years ago, but the pet food industry is not comfortable with these terms. Bill Bookout with NASC asked if the proposal would achieve the end goal to reduce pet obesity. He stated that pet obesity is primarily caused by feeding table scraps, the lack of exercise and overfeeding in general. Would this proposal achieve the final outcome?

Dave Syverson asked state feed control officials from the audience for comments. Elizabeth Higgins with the New Mexico Department of Agriculture stated that her boss is adamantly opposed to the proposal because of the excessive regulatory burden. Dave Syverson then asked for comments from the committee. Dr. Burkholder said that he feels it is important for the committee to do something with this proposal - either form a working group to talk with groups we have not heard from, move the proposal to the Board, or drop it. Dr. Burkholder stated that we are debating the same points over and over again. He said we have heard from both sides and now we need to do something. Dave Syverson agreed. Rod Noel said that we should either drop the proposal or study it further. He said he is not ready to vote on the issue. Teresa Crenshaw indicated that the Pet Food Committee has always formed working groups to discuss difficult issues in the past such as descriptive terms and family, and the representatives around the table have indicated that they support such a working group. Dave Syverson asked which advisors would be part of such a group. Liaisons from PFI, APPMA and AFIA, and Dr. Dzanis said that they would participate. Nancy Cook stated that PFI would include APPMA in the discussions. Dave Syverson will give the advisors a week to submit the name of their representative. Dave Syverson asked if Dr. Burkholder and Lynn Sheridan would agreed to work on this group as representatives for the Pet Food Committee, and they agreed. Dave Syverson stated that the group would produce a document for discussion at the next meeting. Dave Syverson recommended Dr. Burkholder as the chair of this group, and Dr. Burkholder agreed.

## **6. Proposed PF 10(c) Weight Related Terms**

PFI and all agreed that it would be acceptable to move on to other items on the agenda.

## **7. Pet Food Labeling Guide – Ongoing Maintenance**

Dave Syverson said that the Pet Food Labeling Guide should be updated before the workshop. He said that a project coordinator would be needed to oversee this task and to give assignments to the Pet Food Committee members. Dave Syverson asked Dr. Noel to be the coordinator, and he agreed. Dr. Noel estimated it would take about six months to complete the project. Dave Syverson said that he prefers that the committee members themselves perform the update rather than to have industry do it. Electronic copy should make this easy. Dave Syverson volunteered to help if he was given an assignment.

## **8. Pet Food Regulatory Workshop**

Dave Syverson asked for comments from Nancy Cook about the need for a pet food workshop. Nancy Cook stated that many industry and state regulators have indicated a need to refresh themselves with the regulations, and new people need to understand them. She said that there are always differences in how people interpret the rules, and new issues need to be addressed, such as “organic”. She said that it is time for a workshop to talk about real and perceived ideas about pet food labels. Nancy Cook said that next January would be an appropriate time to put together a workshop. She said that the workshop should be educational and pay for itself, and she asked for industry and regulators to participate. Dave Syverson said that he would like to see this be an event put on by AAFCO in January 2008. The amount of time for the workshop would depend on the content, and he is looking for ideas. Dave Syverson suggested “organic”, pet food regulations, a laboratory guide, drugs versus feed, etc., and he said that compliance versus regulatory discretion should also be included. Nancy Cook asked for a copy of this list. Dave Syverson stated that he would send the list of suggested topics to the committee advisors so that the content can be decided.

## **9. Quantity Statement**

Dave Syverson said that issue was discussed in the Model Bills Committee so there was no need to discuss this at the Pet Food Committee meeting.

## **10. Policy Statement 27: “Snouts”**

Teresa Crenshaw explained that a manufacturer asked if “snouts” were exempted from registration and labeling in AAFCO Policy Statement 27 as were other similar types of products. Since snouts were not listed, she told the company that they were not exempt. Teresa Crenshaw told the company that she would present this issue to the Pet Food Committee for addition to the list of products in Policy Statement 27. Nancy Cook asked if other similar products could also be added, such as “pizzles”. Dr. Burkholder and Dr. Noel said that “pizzles” was not an anatomically correct term. Teresa Crenshaw motioned to add “snouts” to the list of exempted products in Policy Statement 27; second by Dr. Noel. Motion approved.

Meeting adjourned.

