

MINUTES
AAFCO PET FOOD COMMITTEE
AAFCO 2011 MIDYEAR MEETING
St. Pete Beach, Florida
Tuesday, January 18, 2011 1:30 PM – 3:15 PM

1. Introduction of Pet Food Committee Members and Advisors

The meeting was called to order at 1:34 pm. The following Pet Food Committee (PFC) members and advisors were introduced:

Committee Members

Teresa Crenshaw (DE), Interim Chair
Nate Bartz (WI)
Erin Bubb (PA)
Dr. William Burkholder (FDA-CVM)
Elizabeth (Liz) Higgins (NM)
Roger Hoestenbach (TX)
Eric Nelson (FDA-CVM)
Jan Jarman (MN)

Industry Advisors

Jan Campbell (NGFA)
Nancy Cook (PFI)
Dr. David Dzanis (ACVN, APPA)
Nate Fairfield (NGFA)
Jarrod Kersey (AFIA)
Dr. Angele Thompson (PFI)
Ed Rod (APPA)
Jarrod Kersey (AFIA)
Jason Vickers (AFIA)

Dave Syverson (MN) was present by conference call.

There were a total of 44 control officials, 88 industry representatives, 20 industry association representatives and one interested individual who signed the meeting roster.

2. Announcements

There were no announcements.

3. Modifications to the Agenda

Teresa Crenshaw (DE) asked to remove Agenda Item 10 (Vitamin D Levels in the AAFCO Nutrient Profiles) from discussion at the request of the Michigan Department of Agriculture since the level of Vitamin D would be included in the discussion of changes to the AAFCO Nutrient Profiles.

4. Approval of Minutes from Portland, OR

There were no corrections or revisions to the minutes. Roger Hoestenbach (TX) motioned to accept the minutes. Jan Jarman (MN) seconded the motion. The committee approved the minutes.

**5. Summary of the AAFCO Pet Food Labeling Workshop – Elizabeth Higgins, NM
Department of Agriculture**

Teresa Crenshaw (DE) stated that the workshop was important to help develop compliant labels thus saving time and money for both industry and control officials.

Liz Higgins (NM) reported there were 197 attendees at the workshop including 48 control officials, 148 industry representatives, and one interested individual. Liz recognized and thanked the members of the coordinating committee: Jan Jarman (MN), Meagan Davis (AAFCO Board), Angele Thompson (PFI), Nancy Cook (PFI), Jarrod Kersey (AFIA), and Jason Vickers (AFIA). Liz noted that the PowerPoint presentation from the workshop would be posted on the AAFCO website after minor corrections were made.

6. Reports from the AAFCO PFC Working Groups

A. Small Manufacturers Working Group/AAFCO Pet Food Website - Elizabeth Higgins, NM Department of Agriculture & Lynn Sheridan, WA State Department of Agriculture

Although the new pet food section of the AAFCO website was not ready for public viewing, Elizabeth (Liz) Higgins (NM) provided a brief update of this much anticipated website. Liz noted that questions from the Pet Food Labeling Workshop would be added to the website.

Liz announced that Erin Bubb (PA) would replace her as the co-chair of this working group.

B. Nutrient Profiles and Feeding Protocols Expert Committee - Dr. William Burkholder, FDA-CVM

Dr. Burkholder (FDA-CVM) thanked the members of the Expert Committee for their efforts over the last several years: Dr. Tiffany Bierer, Dr. Andrew Crawford, Dr. Gail Czarnecki-Maulden, Dr. Andrea Fascetti, Dr. Dennis Jewell, Dr. Gail Kuhlman, Mr. Michael Panasevich, Dr. Rebecca Remillard, and Dr. Angele Thompson. He also thanked Dr. Wendell Kerr with Nestle Purina for his assistance.

The Expert Committee submitted their recommendation to the PFC just prior to the January 2011 meeting. In his email to the PFC, Dr. Burkholder stated that the Expert Committee had done a meticulous review of the Nutrient Profiles. He also said that this was a well thought out and researched set of recommendations. Dr. Burkholder noted that the PFC members and advisors indicated that they needed additional time to review the recommendations of the Expert Committee since there had not been sufficient time to do so prior to this meeting.

In the late 1980's and early 1990's, there was a need for the development of the AAFCO Nutrient Profiles as the nutritional standard for dog and cat food. In

2006, the National Research Council (NRC) published the Nutrient Requirements of Dogs and Cats, and these were the values that were reviewed and evaluated by the Expert Committee. Because the 2006 NRC nutrient requirements may be applicable to pet food, Dr. Burkholder questioned whether the AAFCO Nutrient Profiles needed to be revised again or retired. The Expert Committee's review took several years to accomplish, and there were several instances where the committee took issue with the NRC as mentioned in the report. Dr. Burkholder stated that the knowledge of dog and cat nutrition had advanced since the last revision to the AAFCO Nutrient Profiles. He said he did not see any substantive differences between the NRC and the AAFCO Nutrient Profiles and suggested that this may be the last time the AAFCO Nutrient Profiles were revised.

Teresa Crenshaw (DE) asked that comments to the reports of the Expert Committee be submitted to the Chair of the PFC by May 1, 2011. On behalf of AAFCO, Teresa thanked the Expert Committee for their work on this difficult and time-consuming project. She said that their report was a document for which AAFCO should be proud. On behalf of PFI, Nancy Cook thanked the Expert Committee for their work.

C. Carbohydrate Working Group – Jan Jarman, MN Department of Agriculture

Jan Jarman (MN) explained that the Pet Food Carbohydrate Working Group was formed at the AAFCO 2010 Annual Meeting in Portland, OR. Members of the group are: Jan Jarman (MN), Erin Bubb (PA), Dr. William Burkholder (FDA-CVM), Dr. David Dzanis, Dr. Angele Thompson, Preston Buff, and Richard Ten Eyck (OR), Chair of the original Carbohydrate Working Group for the Feed Labeling Committee.

Jan said that the Working Group's charge was to examine appropriate labeling requirements for pet food claims for low dietary starch and sugar content. The original Carbohydrate Working Group made some suggestions for label requirements for pet food products making such claims, and the PFC's Carbohydrate Working Group would evaluate those suggestions.

Jan stated that the working group had one conference call. The members primarily discussed the need to find a scientifically valid method for determining what levels of starch and sugars might be defined as "low". The work of the Working Group would be ongoing.

7. Proposed Revision to Regulation PF4(a)(4) - Guarantees for Specialty Pet Food

A. Status of the Note that Follows the Proposed Revised Regulation:

Teresa Crenshaw (DE) noted that questions had arisen at the meeting of the Model Legislation and Regulation Committee about the note that accompanied the revision for Regulation PF4(a)(4). Teresa noted that at the AAFCO business

session held just prior to this meeting, the AAFCO membership approved a note to appear in the AAFCO Official Publication in the What's New cover sheet. The note would state: "The AAFCO Board of Directors recommends that PF4(a)(4) not be enforced prior to January 2013."

B. Additional Revisions to Model Pet Food Regulations Referencing Guarantees for Specialty Pet Food – Dr. David Dzanis, APPA

Because of the revisions to PF4(a)(4), Dr. Dzanis (APPA) recognized two other regulations which should also be revised. Dr. Dzanis' two proposed amendments to PF4(c)(2) and PF4(d)(2) were:

1. AAFCO Model Regulation PF4(c)(2)

Minimum guarantees for all minerals from sources declared in the ingredient statement expressed as the element in units specified in ~~Model Regulation 4(b)~~ the AAFCO Cat Food Nutrient Profiles when no species-specific nutrient profile has been recognized by AAFCO; and provided that

2. AAFCO Model Regulation PF4(d)(2)

Minimum guarantees for all vitamins from sources declared in the ingredient statement expressed in units specified in ~~Model Regulation 4(c)~~ the AAFCO Cat Food Nutrient Profiles when no species-specific nutrient profile has been recognized by AAFCO; and provided that

Teresa Crenshaw (DE) asked for questions from the committee. Liz Higgins (NM) motioned that AAFCO Model Regulations PF4(c)(2) and PF4(d)(2) be moved to the AAFCO Board of Directors for further review by the Model Legislation and Regulation Committee. Dave Syverson (MN) seconded the motion. The committee approved the motion.

8. Review of the Language for the New Calorie Content Regulation

Teresa Crenshaw (DE) explained that the Working Group for Weight Related Terms and Calories chaired by Roger Hoestenbach (TX) submitted a report to the PFC that included recommendations to revise AAFCO Model Regulation PF9 and add new language to Model Regulation PF10. The PFC approved the report and recommendations at the 2010 AAFCO Annual Meeting in Portland, OR; however, the PFC did not have an opportunity to discuss the specific language of the revised/new regulations.

Teresa said that she wanted to review AAFCO Model Regulation PF9 separately from AAFCO Model Regulation PF10 due to time constraints for this meeting. She said she would like to review AAFCO Model Regulation PF9 line by line.

Roger Hoestenbach provided comments about the analytical variation (AV) for calorie content statements. He noted that an AV could be developed from the Modified Atwater calculation, but it would not be the responsibility of the PFC to develop the AV. The PFC could send a request to the AAFCO Lab Services Committee, which could be done at a later date.

Teresa asked for comments for AAFCO Model Regulation PF9. Jan Jarman (MN) commented that the term “biscuits” in AAFCO Model Regulation PF9(a)(2) was not a familiar household measure. She offered a correction as follows:

- (2) *The statement shall be measured in terms of metabolizable energy (ME) on an “as fed” basis and must be expressed both as “kilocalories per kilogram” (“kcal/kg”) of product, and as kilocalories per familiar household measure (e.g., cans; or cups, biscuits) or unit of product (e.g., treats or pieces); and*

Jan Jarman (MN) motioned that this change to AAFCO Model Regulation PF9(a)(2) be approved. Erin Bubb (PA) seconded the motion. The PFC approved the motion with a vote of five in favor and two opposed. The motion was approved.

Teresa continued that she had concerns about AAFCO Model Regulation PF9(a)(5) since the regulation did not clearly specify where the words “calculated” and “fed” should appear in the calorie content statement. She recommended that the words “calculated” or “fed” appear in the heading “Calorie Content” as follows:

- (5) *The calorie content statement shall appear as one of the following:*
- (A) *The heading “Calorie Content” ~~claim~~ on the label or other labeling shall be followed parenthetically by the word “calculated” when the calorie content is determined in accordance with Regulation PF9(a)(3)A; or*
 - (B) *The heading “Calorie Content” ~~claim~~ on the label or other labeling shall be followed parenthetically by the word “fed” when the calorie content is determined in accordance with Regulation PF9(a)(3)B.*

Liz Higgins (NM) motioned to approve this change. Jan Jarman (MN) seconded the motion. The PFC approved the motion.

Teresa asked for clarification from the Working Group for the reason for the exemption. Roger Hoestenbach (TX) stated there were early discussions that it would be difficult for small manufacturers to determine the calorie content of their products, and the control official would be burdened by confirming the calorie information. The Working Group decided that products with a value of 500 kcals/kg or less would be appropriate for an exemption. Roger said that this value of 500 kcals/kg was an arbitrary number, and if not appropriate, comments would be submitted. There had been no comments. Dr. David Dzanis said that the number was submitted by ACVN and was not arbitrary. He said that a product with 500 kcals/kg or less would not provide significant calories. It was noted that the exemption for products containing 500 kcals/kg or less would not relieve the burden of determining since the company would still have to determine and document

that the product contained 500 kcal/kg or less. Teresa stated that it was the original intent to require calorie content on all pet food. Dr. Dzanis said that ACVN would not object to removing the exemption since the original intent of the exemption did not relieve the burden to the company to determine the calorie content or to the control official to confirm the exemption. Teresa recommended that the exemption in Model Regulation PF9(c) be removed.

Roger Hoestenbach (TX) motioned to remove the exemption by deleting Model Regulation PF9(c). Erin Bubb (PA) seconded the motion. The PFC approved the motion.

Teresa stated that the changes to Model Regulation PF10 would be discussed at the next meeting. She reminded the PFC that there should be no changes to the intent of the Working Group's proposal. She asked for a motion to move the changes to Model Regulation PF9 to the AAFCO Board of Directors. Roger Hoestenbach (TX) motioned that AAFCO Model Regulation PF9 be moved to the AAFCO Board of Directors for further review by the AAFCO Model Legislation and Regulation Committee. Nate Bartz (WI) seconded the motion. The PFC approved the motion.

Dr. Angele Thompson asked if the PFC could approve a note to recommend when the changes should be enforced. Dr. Dzanis said that ACVN would support a delayed period for enforcement since this regulation would result in a significant label change for the pet food industry. Roger Hoestenbach (TX) stated that the Working Group's report did include a recommendation for time period for industry to implement the change. Dr. William Burkholder (FDA-CVM) said that the PFC could not recommend a definitive year since the language still had to go through a review by the AAFCO Board of Directors and by the AAFCO Model Legislation and Regulations Committee. He suggested that we put a timeline in the committee's recommendation after approval by the AAFCO membership. Nancy Cook reminded the PFC that the timeline should start from the date that the regulation is printed in the AAFCO Official Publication.

There was much discussion about the timeframe that the industry would need to implement these label changes. Jason Vickers said that this issue had not been discussed with their member companies, and it would only be fair for the PFC advisors to ask their member companies for a recommendation. He said that they would have this information at the next meeting. Nancy Cook stated that when the PFC worked on the Pet Food Family guidelines, the PFC recommended a period of five years to allow companies to move all products through the system. She recommended 18 months for new products and five years for existing products that would begin after the regulation was printed in the AAFCO Official Publication.

Dr. Thompson asked about products with claims for urinary and hairball control that required a review by FDA-CVM. She said any change in the labels must be reviewed by FDA-CVM. Dr. Burkholder said that the addition of a calorie content statement would not be a problem if no other changes were made.

Liz Higgins (NM) said that she agreed with the timeframe and motioned that the PFC recommend 18 months for new products in development and five years for existing products after the regulation was printed in the AAFCO Official Publication. There was no second to the motion. The motion died.

Roger Hoestenbach (TX) motioned that the PFC recommend 18 months for new products in development and three years for existing products after printing in the AAFCO Official Publication. Dr. Burkholder (FDA-CVM) seconded the motion. The PFC approved the motion.

Dr. Burkholder (FDA-CV) motioned that the remaining items be tabled and the meeting adjourned. Liz Higgins (NM) seconded the motion. The PFC approved the motion. The meeting was adjourned at 3:30 pm.

9. Adjourn Pet Food Committee Meeting

Upon adjournment of this meeting, Teresa Crenshaw (DE) announced that Liz Higgins with the New Mexico Department of Agriculture would assume the position as Chair of the AAFCO Pet Food Committee. She offered her congratulations to Liz!