

MINUTES
AAFCO PET FOOD COMMITTEE
AAFCO 2012 ANNUAL MEETING
INDIANAPOLIS, IN
SUNDAY, AUGUST 5, 2012 1:30 PM - 3:30 PM Indiana E-G

1. Introduction of Pet Food Committee Members and Advisors

Vice-Chair Jan Jarman (MN) called the meeting to order at 1:37 pm. The following Pet Food Committee (PFC) members and advisors were in attendance:

Committee Members

Jan Jarman (MN) Vice-Chair
Nate Bartz (WI)
Erin Bubb (PA)
Dr. William Burkholder (FDA-CVM)
Charlotte Conway (FDA-CVM)
Stan Cook (MO)
Donna DiCesare (NY)
Kristen Green (KY)
Roger Hoestenbach (TX)

Industry Advisors

Dr. David Dzanis (ACVN, APPA)
Dr. Jean Hofve, Pet Welfare Alliance (PWA)
David Meeker (NRA)
Angela Mills (NGFA)
Dr. Angele Thompson (PFI)
Pat Tovey (PFI)
Jason Vickers (AFIA)
Leah Wilkinson (AFIA)

Committee members present by conference call were Johanna Phillips (ID) and Liz Higgins (NM), Chair.

A total of 9 committee members, 9 advisors, and 93 guests signed the attendance roster. Of the 93 guests, 21 were feed control officials and 72 were industry representatives and other interested parties.

2. Announcements

Jan Jarman (MN) welcomed Pat Tovey as a new committee advisor representing PFI.

Jan announced that the revisions to AAFCO Model Regulation PF9 to require calorie content statements on pet food labels were reviewed by the Model Bills and Regulations Committee on August 4, 2012. That committee moved to recommend that the AAFCO Board of Directors (BOD) present the revisions to the general membership for consideration.

Jan stated that committee members and advisors should review the *AAFCO By-Laws and Guidelines* and *the Committee Guidelines*, both found in the AAFCO Official Publication and on the AAFCO website, to understand committee protocol and their responsibilities as

committee members and advisors. She also reminded members about the importance of meeting timelines for assignments and comment periods.

3. Modifications to the Agenda

There were no modifications or changes to the agenda.

4. Approval of Minutes from 2012 Midyear Meeting, Reno, NV

No corrections were noted to the minutes from the January 2012 Midyear Meeting held in Reno, NV. Nate Bartz (WI) moved to accept the minutes, and Roger Hoestenbach (TX) seconded the motion. The motion carried by voice vote.

5. Reports from the AAFCO PFC Working Groups

A. Small Manufacturers Working Group -Erin Bubb, PA Dept. of Agriculture
AAFCO Web Page "The Business of Pet Food"

Erin Bubb (PA) reported that "The Business of Pet Food" went live on the AAFCO website in August 2011. Many comments have been received indicating that this site has been used extensively as an effective reference tool. Several state feed control officials have noted a decrease in staff time spent on assisting small pet food manufacturers.

Erin said the Working Group has received reports that some of the links on the site were not working properly, and that some of the information on the site is missing. She stated that the necessary corrections will be made.

Erin reminded committee members and those in attendance that updating and maintaining the site will be ongoing. She also indicated that a visitor counter is planned to determine the volume of traffic to the site.

Liz Higgins (NM) stated that the PowerPoint presentation from the Pet Food Labeling Workshop held in January 2011 will be added to the site.

B. Nutrient Profiles and Feeding Protocols Expert Committee – Dr. William Burkholder, FDA-CVM
Proposed Revisions to the AAFCO Dog and Cat Food Nutrient Profiles and Feeding Protocols

Dr. Burkholder stated that the work of the Expert Committee was completed with the submission of the report to the Chair of the Pet Food Committee on May 31, 2012.

Dr. Burkholder reported that FDA-CVM is concerned with the Expert Committee's recommendation that the calcium (Ca) level for complete and balanced dog foods for growth of large-breed puppies can be decreased from 1.2% Ca on a dry-matter (DM) basis to 0.9% Ca for the reasons stated in the July 3, 2012 letter from FDA-CVM to the PFC.

Jan Jarman (MN) stated that discussion of the Expert Committee's report and FDA-CVM's concerns will be postponed until the January 2013 Midyear Meeting in order to give committee members and advisors time to review the information and their options.

Jason Vickers (AFIA) asked if there would be an opportunity for industry to comment on the recommendations of the Expert Committee and FDA-CVM. Dr. Burkholder responded that the Canine Expert Committee members were well aware of concerns regarding their recommendations. The prevailing position of the Expert Committee is what has been submitted to the PFC.

Jan Jarman expressed the PFC's sincere appreciation to Dr. Burkholder and the Expert Committee for their extensive and hard work on this working group. Donna DiCesare (NY) motioned to accept the Expert Committee's report on the revisions to the Nutrient Profiles and Feeding Protocols, and Roger Hoestenbach (TX) seconded the motion. The motion carried by voice vote.

Dr. Burkholder briefly described the timeline considerations for the proposed revisions in the report. If the PFC votes to forward the report to BOD at the 2013 Midyear Meeting in Albuquerque, NM, the AAFCO BOD could then present the recommendations to the general membership at the 2013 Annual Meeting in St. Pete Beach, FL. If accepted, the earliest the revisions could be included in the AAFCO Official Publication would be 2014.

C. Carbohydrate Working Group - Jan Jarman, MN Dept. of Agriculture

Jan Jarman (MN) stated that work on the recommendations for dietary starch, sugar guarantees, and claims was halted due to the lack of laboratory methods. The Working Group will discuss these issues prior to the January 2013 Midyear Meeting.

6. AAFCO Guidelines for Tartar Control Claims. Is there a Conflict with FDA Policy?
Nate Bartz, WI Dept. of Agriculture, Trade and Consumer Protection

Nate Bartz (WI) reported that a working group was formed at the 2011 Midyear Meeting in St. Pete Beach, FL to determine if there is a conflict between FDA policy and the AAFCO Guidelines for Tartar Control Claims listed on pages 132-133 of the 2012 AAFCO Official Publication.

The printed report from the Working Group was shared with the PFC (and attached to these minutes). The main point of concern may be differences in wording between the FDA policy, the AAFCO guidelines, and information presented in an FDA Veterinarian Newsletter. The Working Group does not believe there is a conflict.

Roger Hoestenbach (TX) moved to accept the Working Group's report, and Erin Bubb (PA) seconded the motion. The motion carried by voice vote.

Jan Jarman (MN) thanked the members of the Working Group for their participation.

7. AAFCO Pet Food and Specialty Pet Food Labeling Guide and Label Review Checklist – Need Updating and Revision

Jan Jarman (MN) indicated that as a result of revisions to the Model Regulations for specialty pet food guarantees, the *Pet Food and Specialty Pet Food Labeling Guide* and *Label Review Checklist* should be updated. Sections for enzymes and direct-fed microbials have been recommended and some corrections are needed.

Johanna Phillips (ID) agreed to chair a working group to revise the *Pet Food and Specialty Pet Food Labeling Guide* and *Label Review Checklist*. The following volunteers agreed to participate in the Working Group: Stan Cook (MO), Kristen Green (KY), Mika Alewynse (or a representative from FDA-CVM), Angele Thompson (or a representative from PFI), Dr. Dave Dzanis (APPA), Leah Wilkinson (or a representative from AFIA), Dr. Jean Hofve (PPAG), and Susan Thixton (Truth About Pet Food).

8. AAFCO Model Regulation PF3, Brand and Product Names – Inapplicability of Regulations to Certain Product Names

Jan Jarman (MN) stated that questions have been raised recently about the Model Pet Food Regulations for product names for products with only a few ingredients. For example, what would be an acceptable product name for a treat made only of chicken and sweet potato? If the product was not 95% chicken, a descriptor such as "recipe" or "formula" would have to be used.

Jan stated that the concern is the rules about ingredients in product names were written to avoid misleading the consumer about product composition. However, a name such as "Chicken and Sweet Potato Treats" is not misleading if the product only contains chicken and sweet potatoes. The use of a descriptor is not necessary to indicate the presence of other ingredients, because there are none.

Jan asked if others thought that revisions to AAFCO Model Pet Food Regulation PF3 might be needed or if AAFCO Model Pet Food Regulation PF3(e) would apply to such products. Several committee members and advisors commented that they have never understood how AAFCO Model Pet Food Regulation PF3(e) should be used. The PFC decided to study

this issue further. Angele Thompson (PFI) requested further information describing the issue, and Jan said she would provide it.

9. Adjourn Pet Food Committee Meeting

Jan Jarman (MN) stated that agenda items for the January 2013 Midyear Meeting must be submitted to Chair Liz Higgins (NM) by **November 21, 2012**. Chair Liz Higgins will send out a reminder to the PFC members and advisors prior to the deadline.

Nate Bartz (WI) moved to adjourn the meeting and Erin Bubb (PA) seconded the motion. The motion was carried by voice vote. The AAFCO PFC meeting was adjourned at 2:15 p.m.