



Pet Food Committee Report/Minutes
Webinar
April 24th, 2017, 3pm-4pm EST

Committee Recommendations

Committee recommendation summary or list.

- (1)
- (2)

Board Recommendations

Board recommendation summary or list.

- (3) PFC moved to accept and moves to the Board of Directors for their consideration the Guidelines for Dental Related Claims in Appendix A intended to replace the Guidelines for Tartar Control Claims found on page 147 of the 2017 OP.
- (4)

Association Actions

Association action summary or list.

- (1)
- (2)

Committee Participants

Members Present: Austin Therrell (SC), Liz Beckman (WA), Christie Shee (IN), Liz Higgins (NM), JoLynn Otero (NM), Suzanne Riddle (MO), Charlotte Conway (FDA-CVM), Kristen Green (KY), William Burkholder (FDA-CVM), Jan Jarman (MN), George Ferguson (NC). Also present was Nathan Price (ID)

Advisors Present: Leah Wilkinson (AFIA), Dave Dzanis (APPA and ACVN), Angele Thompson (PFI).

Committee Report

Committee Activities

Motion to recommend to the Board of Directors for their consideration that the Guidelines for Dental Control Claims as displayed (see Appendix A) replace the current Guidelines for Tartar Control Claims in the AAFCO OP. Moved by Jan Jarman (MN). Seconded by Austin Therrell (SC). Motion Passed.

Discussion Items:

Discussion of the Guidelines for Dental Related Claims

The Dental Control Guidelines as previously provided to the PFC were presented along with comments that had been received in between meetings concerning issues and sample language for Guidelines (2) (5) and (6). Language for Guidelines (2) and (5) was amended to allow claims for control of bad breath odor through use of appropriate masking flavors. The previous language appeared to limit such claims to mechanical action. This change will need to be noted in the next version of the Pet and Specialty Pet Food Labeling Guide.

The other Dental discussion item was the addition of examples to Guideline (6). There was considerable discussion as to whether or not examples should be added. Some were concerned that the inclusion of examples would limit firms to use of only those examples. It was noted that the language “such as, but not limited to” should help mitigate this confusion. It was discussed that the examples provided in the Guidelines are not meant to represent the only acceptable examples. It was suggested to add an appropriate breath control through masking flavor example.

Voluntary USDA-AMS Process Verified Audit System for Human Grade Claims

There is interest in gauging regulator support for (and acceptability of) a voluntary USDA-AMS process verified audit system for human grade claims. USDA-AMS can use a common AAFCO standard and audit to a central AAFCO standard. This does not have to be written into regulation. This process wouldn't be required, but would be a good way for firms to gather human grade documentation and be listed as process verified on the USDA-AMS website. There has been initial interest amongst polled regulators for support of the proposed program. This program will only likely be of benefit if states accept a successful USDA-AMS audit as adequate substantiation for human grade claims.

There was strong support on the call by regulators. This item will be added to the Annual meeting agenda to further gauge regulator support in a public forum. Available information regarding the proposal will be supplied via Feed Bin to regulators in advance of the meeting.

Possible Agenda Items for the Annual Meeting in Bellevue:

- Voluntary USDA-AMS Process Verified Audit System for human grade claims.
- Updating the Business of Pet Food and AAFCO Talks Pet Food Website: It has been suggested that the PFC look again at these websites for required updates (ex. human grade, calorie content statements, etc.). The topic will be raised at the annual meeting in Bellevue with the intention of forming a working group.
- Discussion of history and confusion surrounding PF3e: This item in the Model Bill has elicited some confusion and requests for clarity. While not an urgent, the issue may be raised at the annual meeting (time permitting).
- Updating the GLG series in the feeding trial section based on "all life stages" claims dependent on dog size. It was discussed that this item should be discussed in detail and will likely require the formation of a working group.

Call was concluded 4 pm EST.

APPENDIX A: Guidelines for Dental Related Claims

The Pet Food Committee recommends for consideration to the Board of Directors that the guidelines displayed below replace the Guidelines for Tartar Control Claims found on page 147 in the 2017 OP.

Guidelines for Dental Related Claims

The AAFCO Pet Food Committee supports and recommends the following guidelines for tartar and plaque control with respect to pet food products (including snacks and treats), rawhides, and other chews.

- (1) Foods bearing dental related claims (claims to cleanse or whiten teeth or freshen breath) by virtue of their abrasive or mechanical actions are not objectionable.
- (2) Foods bearing dental related claims for plaque or tartar reduction or prevention, or control of bad breath odor may be misbranded. However, if these claims are made only with respect to the products' abrasive action or masking flavor, enforcement would be a low priority.
- (3) Foods bearing expressed or implied drug claims to prevent or treat dental diseases (e.g. gingivitis, gum problems, tooth loss) are not permissible unless they are the subject of approved New Animal Drug Applications.
- (4) Food ingredients that are not GRAS (generally recognized as safe) for the intended purpose of affecting the teeth or gums may be unapproved food additives or unapproved drugs, depending on the nature of the claim.
- (5) Foods bearing claims for plaque or tartar reduction, prevention, or control of bad breath odor that achieve their effect, in part or in total, by means other than mechanical action or masking flavor must have an approved New Animal Drug Application or a letter of favorable review from the FDA prior to being marketed.
- (6) The labels of foods bearing dental related claims must state the method(s) or mechanism(s) by which the intended effects are achieved, such as, but not limited to: with ridges to help scrape teeth, coated with a unique ingredient to help prevent tartar buildup, with peppermint to help freshen breath.