



FINAL 2/14/18kg

Pet Food Committee Minutes

AAFCO Midyear Meeting

January 23rd, 3:00 pm-5:00 pm PST; Garden Grove, CA

Committee Recommendations

Committee recommendation summary or list.

- (1) Pet Food Committee (PFC) moved to accept the GAPFA Maximum Vitamin A Workgroup report and recommend to the Board of Directors for their consideration and response to GAPFA.
- (2) PFC moved to accept and recommend the proposed change to PF2 and move to the Model Bill and Regulations Committee for their consideration.

Board Recommendations

Board recommendation summary or list.

- (3)
- (4)

Association Actions

Association action summary or list.

- (1)
- (2)

Committee Participants

Members Present: Kristen Green (Chair, KY), Stan Cook (Vice-Chair, MO), Lizette Beckman (WA), James Embry (TX), George Ferguson (NC), Liz Higgins (NM), Tiffany Leschishin (MN), Jo Lynn Otero (NM), Jason Schmidt (LA), Katie Simpson (IN), Austin Therrell (SC), Kristen Hamilton (ID – call-in)

Advisors Present: Leah Wilkinson (AFIA), Robert King (AFIA), Dave Dzanis (APPA and ACVN), Angela Mills (NGFA), David Fairfield (NGFA), David Meeker (NRA), Angele Thompson (PFI), Pat Tovey (PFI), Bill Bookout (NASC), BC Henchen (AFTP), Cathy Alinovi (NGPFMA), Jean Hofve (PWA – call-in), Mollie Morrissette (PWA – call-in)

NOTE: FDA members were not able to attend the meeting due to the government shutdown.

Committee Report

Committee Activities

Motion to disband the Pet Food and Specialty Pet Food Labeling Workshop workgroup. Moved by Liz Higgins (NM) and seconded by Stan Cook (MO). Motion Passed.

Motion to accept the GAPFA Maximum Vitamin A Workgroup report as displayed (see Appendix I). Moved by Liz Higgins (NM) and seconded by Austin Therrell (SC). Motion passed.

Motion to send the GAPFA Maximum Vitamin A Workgroup report to the AAFCO Board of Directors for their consideration and response to GAPFA. Moved by Austin Therrell and seconded by Jason Schmidt (LA). Motion passed.

Motion to add PF2 verbiage as displayed (see Appendix II). Moved by James Embry (TX) and seconded by Jason Schmidt. Motion passed.

Motion to establish a PF3(e) Workgroup. Moved by Stan Cook (MO) and seconded by Liz Higgins (NM). Motion passed.

Motion to establish a Human Grade Pet Food Validation Workgroup. Moved by George Ferguson (NC) and seconded by Stan Cook (MO). Motion Passed.

Committee Minutes

Meeting called to order at 3:05 pm PST

Announcements

PFC welcomed Katie Simpson from the Office of the Indiana Chemist as a new committee member. PFC also welcomed Bill Bookout with the National Animal Supplement Council, BC Henchen with Association for Truth in Pet Food, and Cathy Alinovi with Next Generation Pet Food Manufacturers Association as new advisors.

PFC announced that AAFCO's Laboratory Methods Services Committee needs additional representation from pet food industry/laboratories for work on moisture methods of analysis. Contact Sharon Webb (KY) with inquiries or to volunteer.

The proposed sugars method is working through the AOAC process and is currently open for public comment. Comments are encouraged, as this is the methodology that supports the sugars guarantee linked to carbohydrate claims on pet foods. To make a comment, visit: https://www.aoac.org/AOAC_Prod_Iomis/AOAC_Member/ANews/2018_News/NEWS_011818.aspx

Working Group Reports:

Pet Food & Specialty Pet Food Labeling Workshop – Kristen Green, Univ. of KY

The second of two workshops will be held at the conclusion of this AAFCO mid-year meeting. The workshop was built upon the hard work done to update the Pet Food Regulations Label Review Checklist and the Pet and Specialty Pet Food Labeling Guide. Special thanks to Charlotte Conway, Kristen Green, members, advisors, and Jennifer Roland with FASS and other volunteers for their tremendous efforts over the last several years. This working group has completed its charge and has been disbanded. The materials for the workshop will remain in the Feed BIN under the Projects folder for future use.

AAFCO Website Review – Lizette Beckman (WA)

There are four topics to be updated on the AAFCO Talks Pet Food Website and two have been completed. These will be submitted to the full PFC for review at the Annual Meeting. Work continues on the remaining two topics.

GAPFA Maximum Vitamin A Workgroup – Kristen Green (KY), standing in for Dr. Bill Burkholder and Charlotte Conway with FDA-CVM

The workgroup's recommendation was that AAFCO should not change the vitamin A maximum in growing and reproducing dogs from 62,500 IU/1000 kcal to 100,000 IU/1000 kcal. The Global Alliance of Pet Food Associations (GAPFA) made this request to the AAFCO Board of Directors who then requested a

recommendation from the PFC. The PFC voted to accept the workgroup report and send the workgroup's recommendation to the AAFCO BOD for a response to GAPFA. The workgroup report is available in APPENDIX I.

Reviewing AAFCO Feeding Protocols Workgroup (to account for growth of large size dogs) – Kristen Green (KY), standing in for Dr. Bill Burkholder (FDA-CVM).

The workgroup has not convened yet but has a meeting scheduled. Updates will be forthcoming.

Discussion Items:

Including Calorie Content in PF2 Label Format and Labeling – Kristen Green (KY)

It was proposed to amend PF2 to include calorie content since PF9 was amended requiring a calorie content statement on all pet food products (dog & cat) including treats, snacks, supplements and complete and balanced products. The proposed revision would be to add calorie content requirement language to regulation PF2(a) which outlines basic required pet food label elements (see Appendix II).

Veterinary Oral Health Council (VOHC) Proposal – Dr. Colin Harvey (VOHC)

The revised AAFCO Dental Claims Guidelines require firms to identify the mechanism used to achieve dental claims. The VOHC proposal was intended to present an option to AAFCO to utilize the VOHC process and seal to determine whether such claims can be substantiated. VOHC is not aware of anyone with specific dental expertise in AAFCO and proposes that AAFCO accepts the validity of dental claims for products that are on the VOHC accepted list and have been awarded the VOHC seal. PFC members voiced concerns that use of a non-governmental organization to validate claims might set precedent for other less vigorous third party organizations to propose their own validation protocols. Another concern was whether or not states would be able to legally accept third party reviews even though VOHC is generally a recognized credible organization in reviewing dental claims. Finally, there were concerns that VOHC does not review or consider whether such claims are allowable per the AAFCO Dental Guidelines based on the stated mechanism of action (i.e. enzymatic action). It is important to recognize credible organizations such as VOHC and this information needs to be disseminated. PFC does not intend to pursue this proposal at this time.

Discussion of confusion regarding PF3(e)

There has been continued confusion expressed by control officials and industry regarding PF3(e) and whether it still applies to product names. Dr. Dave Dzanis gave a historical review of PF3(e) and indicated that it has been in the AAFCO OP since the 70s or 80s. In the 90's there was a complete rework of the regulations although the working group was told not to change the intent of the regulations. The workgroup at that time was not sure of the intent of PF3(e), so they left it in the PF Regulations. It appears that PF3(e) was meant as a catch all but regulators and industry have yet to identify a situation under which it might be valid to use. When the regulations were changed in 1988, the flavor language had not been included yet. There are two parts to PF3(e) – part one has probably outlived its usefulness, however part two might still be valid. It was decided to establish a workgroup to determine if PF3(e) is still relevant or if changes should be considered. The workgroup will be chaired by James Embry (TX) and members are Liz Higgins (NM), Angele Thompson (PFI), Dave Dzanis (ACVM, APPA) and Cathy Alinovi (NGPFMA).

Edits to Human Grade Guidelines Language – Dave Dzanis

Dr. Dzanis explained that it was brought to his attention that an interpretation of the human grade guidance was leading to misunderstanding of AAFCO's intent when the guidance was drafted. Use of the word 'edible' in the guidelines has sparked the question: was it the intent and expectation that the final pet food product be subject to USDA oversight and inspection? It was made clear that this was not the intent of the PFC as USDA does not have jurisdiction over pet food products and that this would create an untenable jurisdictional problem. The

proposed edit to the feed term “human grade” and the Human Grade Guidelines is to remove the term “edible”. Dr. Dzanis explained that in drafting the guidelines the workgroup include the term “edible” in its colloquial use versus as a legal term, so the simplest way to solve the issue is to remove the term “edible”. Comments were made that USDA inspects all foods with >3% meat and if said product is moved to the pet food world that USDA will not inspect. There is a large amount of confusion and concern from consumers regarding the proposed change. Note: Dr. Dzanis was not representing ACVN or APPA in this proposal.

A separate motion was made based on both industry and consumer confusion as to who has jurisdiction over these types of products. A Human Grade Pet Food Validation workgroup was formed that will be chaired by George Ferguson. The Workgroup mission shall be: while utilizing AAFCO’s terms, definitions and guidance for human grade pet food claims; identify options whereby FDA and USDA may partner together for the purpose of validating human grade pet food claims in products that span both agencies jurisdiction. The members of the workgroup include: Caitlin Price, Tiffany Leschishin, Austin Therrell, Charlotte Conway, Ryan Perdue, Mollie Morrissette and Heather Waelterman.

Pet Food Label Modernization Discussion – Stan Cook, MO Dept. of Agriculture

The label modernization remains a major focus for PFC. The goal from the AAFCO annual meeting for the workgroup was to reach consensus in the four subgroups for their work products. While not all goals have been met, significant progress has been made. Sample labels have been developed that contain elements from the subgroups that have been working (see Appendix III). The four subgroups are Nutrition Facts Box (Jason Schmidt, Chair), Ingredient List (Richard Ten Eyck, Chair), Nutritional Adequacy Statement (Jo Lynn Otero, Chair) and Safety Statement (Lizette Beckman, Chair). Each subgroup chair reviewed their group’s progress and explained the elements on the mock up labels as well as discussing areas of on-going work and any specific questions that the subgroups have. The floor was opened for comments. The goals for the next meeting are to get subgroup consensus and to complete the regulatory language. Additionally the draft mock up labels as well as other label elements will be included in a consumer survey.

Pet Food Committee Adjourned at 5:05 pm PST.

APPENDIX I –

AAFCO-GAPFA Maximum Vitamin A Workgroup Report

Work group members: William J. Burkholder, DVM, PhD, DACVN; Charlotte Conway, MS, PAS; David A. Dzanis, DVM, PhD, DACVN; Angele Thompson, PhD; Ryan Yamka, PhD, MS, MBA, FACN, PAS, Dipl ACAS

Meeting Date: 11/2/17

Summary of request: In a June 14, 2017 email to AAFCO Pet Food Committee Chair Stan Cook, Global Alliance of Pet Food Associations (GAPFA) president Diane Loiselle requested that AAFCO consider increasing the safe upper limit of dietary vitamin A in growing and reproducing dogs from 62,500 IU/1000 kcal to 100,000 IU/1000 kcal. The request is a component of GAPFA's overall interest in the development of globally aligned scientifically based nutritional standards for dogs and cats.

This working group was formed at the AAFCO Annual Meeting in August 2017, and was charged with reviewing the GAPFA proposal and providing a recommendation to the AAFCO Pet Food Committee.

Workgroup discussion: The GAPFA proposal cited 6 references in the scientific literature, see Appendix A. Of these, 5 predate the review conducted by the National Research Council's Ad Hoc Committee on Dog and Cat Nutrition to support amounts of vitamin A recommended in the 2006 publication of Nutrient Requirements of Dogs and Cats (NRC) and the formation of AAFCO's Canine and Feline Nutrition Expert Subcommittees in 2007. The designs of these studies are limited by short duration and relatively small numbers of animals. The sixth publication, which GAPFA appears to consider its pivotal evidence, was published in 2012 (Morris *et al.*), and reports that 100,000 IU vitamin A/1000 kcal ME is the safe upper limit in diets designed for puppy growth based on a 1 year study in growing Labrador Retrievers and Miniature Schnauzers. This publication is attached in Appendix B.

Only this sixth publication was reviewed in detail by this workgroup because the older studies, and the NRC interpretations, were available to the 2007 AAFCO expert subcommittee for establishing the 62,500 IU/1000 kcal vitamin A maximum for growing and reproducing dogs.

The workgroup concluded that this publication does not provide compelling evidence to support increasing the AAFCO maximum for dietary vitamin A in growing and reproducing dogs from 62,500 IU/1000 kcal to 100,000 IU/1000 kcal. The AAFCO nutrient profiles are structured to address the minimum nutrient requirements, or maximums, of either dogs at adult maintenance or those animals at non-maintenance states which include puppy growth, lactation, gestation, and pre-breeding reproductive states for both dogs and bitches. This publication could potentially only address increasing a maximum for growth of puppies because other non-maintenance states were not included in the trial.

The workgroup also found that the vitamin D content of the basal diet, 1,580 IU/kg, was quite high relative to the AAFCO minimum of 500 IU/kg and over half of the AAFCO maximum of 3,000 IU/kg. Vitamin D is known to mitigate effects of vitamin A on bone development. Thus, the vitamin D content of the test diet in the 2012 Morris *et al.* publication could potentially mitigate formation of bone lesions associated with high vitamin A. Due to the complex metabolism of vitamin A, the workgroup concluded that a study designed to support an increase in the vitamin A maximum would require proper titration of vitamins A and D as well as calcium. The workgroup also questioned the usefulness of some of the selected parameters given information in the historical literature. For example, measurement of growth plates and evaluation of growth plate closure via

traditional radiographs would have likely been more a more sensitive measure than bone density via dual-energy X-ray absorptiometry (DEXA).

During discussion, the workgroup noted that the current AAFCO maximum is already greater than that of the 2006 NRC publication (62,500 IU/1000 kcal ME versus 12,500 IU/1000 kcal ME, respectively). The current AAFCO maximum is the same as that established in the 1992 AAFCO Dog Food Nutrient Profiles. Despite the lower 2006 NRC safe upper limit, in the absence of new scientific data or adverse event reports, the 2007 AAFCO expert subcommittee did not find that a reduction in the maximum was warranted. However, the fact that the 2006 NRC publication established a lower maximum than that found in the AAFCO nutrient profiles provides additional support for not increasing the current maximum. Further, the workgroup discussed that the establishment of a maximum for a given nutrient should not be interpreted by the industry as establishment of an acceptable range for addition of that nutrient to the diet. Vitamin A sources should only be added to the diet at the minimum amount necessary to achieve the intended effect. The current maximum allows for sufficient margin in formulating a diet to account for potential processing and/or storage losses of vitamin A content of food for growing and reproducing dogs.

Appendix A: GAPFA Annex II

Appendix B: Morris, P. J., Salt, C., Raila, J., Brenten, T., Kohn, B., Schweigert, F. J., & Zentek, J. (2012). Safety evaluation of vitamin A in growing dogs. *British Journal of Nutrition*, 108(10), 1800-1809.

Workgroup recommendation: AAFCO should not change the vitamin A maximum in growing and reproducing dogs from 62,500 IU/1000 kcal to 100,000 IU/1000 kcal.

APPENDIX II –

Recommendations

The PFC recommends and moves the revised PF2(a) Label Format and Labeling as displayed below to the Model Bill and Regulations Committee for their consideration. A single line (8) was added to the current regulation along with additional related formatting changes.

The following appears on page 139 of the 2018 AAFCO OP in the Model Regulations for Pet Food and Specialty Pet Food.

Regulation PF2. Label Format and Labeling

(a) Pet food and specialty pet food shall be labeled with the following information prescribed in this

Regulation:

- (1) Product name and brand name, if any, on the principal display panel as stipulated in PF3;
- (2) A statement specifying the species name of pet or specialty pet for which the food is intended, conspicuously designated on the principal display panel;
- (3) Quantity statement, as defined in Section 3(s) of this Act and Regulation 3(a)(8) of the Model Regulations, by weight (pounds and ounces, and metric), liquid measure (quarts, pints and fluid ounces, and metric) or by count, on the principal display panel;
- (4) Guaranteed analysis as stipulated in PF4;
- (5) Ingredient statement as stipulated in PF5(a);
- (6) A statement of nutritional adequacy or purpose if required under PF7;
- (7) Feeding directions if required under PF8;
- (8) A statement of calorie content if required under PF9; and
- (9) Name and address of the manufacturer or distributor as stipulated in Regulation PF11.

Appendix III -

Pet Food Label Modernization presentation with draft mock labels.

KG – NOTE INCLUDE PPT SLIDES