

Pet Food Committee Report/Minutes

2022 AAFCO Mid-year Meeting

Jan 19, 2021 1:15 – 3:00 PM

Committee Recommendations

Committee recommendation summary or list.

- (1) The PFC accepted the revised Guidelines for “Human Grade” Claims (APPENDIX A) and recommend them to the BOD for Membership acceptance. If passed by Membership, these are intended to replace the current Guidelines which start on page 158 of the electronic 2022 OP.

Board Recommendations

Board recommendation summary or list.

Association Actions

Association action summary or list.

Committee Participants

Members Present:

Liz Beckman (WA – Chair), Stan Cook (MO – Co-chair), Darrell Johnson (BOD Liaison), Chris Berg (IA), William Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM), George Ferguson (NC), Madison Fink (MO), Kristen Green (KY), Tiffany Leschishin (MN), JoLynn Otero (NM), Caitlin Price (NC), Katie Simpson (IN), Austin Therrell (SC), James Embry (TX), Barbara-Jean Schleicher (KS).

Advisors Present:

Bill Bookout (NASC), Louise Calderwood (AFIA), Dave Dzanis (APPA), James Emerson (US Poultry and Egg), Dave Fairfield (NGFA), Matt Frederking (NGFA), (Ryan Frank AFIA), Jean Hofve (PWA), David Meeker (NARA), Chris Nash (PFAC), Angele Thompson (PFI), Pat Tovey (PFI), Tim Law (NARA).

Committee Report

Meeting called to order at 1:15 CST

Announcements

New members and advisors to the committee were announced.

Committee Activities

Committee Minutes

Human Grade Working Group – George Ferguson, NC

A previous version of the Guidelines for “Human Grade” Claims were posted publically to the website in August 2021 for a question/comment period. All questions/comments received back and the working group’s answers were then also posted online and in the Feed Bin. These Q & As have been posted for a month at the time of this meeting. The working group developed a revised version of the human grade guidelines based on the feedback and noted in the Q & A document where modifications were made. The revised Guidelines for “Human Grade” Claims (APPENDIX A) are currently available in the Feed Bin and on aaftco.org and were displayed during the meeting.

AFIA comments were that they would like to see a few tweaks to the document, but overall supportive and would like to see the document move forward.

- 1) In support of a single affidavit in place of multiple for substantiation. AFIA has provided PFC a sample document.
- 2) Use of the word ‘firm’ should be further clarified as to whether this means guarantor, manufacturer, etc.
- 3) To refresh the workgroup to allow for new participation.

4) Can industry get copies of the mock AMS-Human Grade audits that have been performed?

George Ferguson responded:

- 1) While it may not be possible to do a single affidavit, the issue can be taken to the workgroup for consideration with the goal of reducing burden. A comment was made to industry that often the best document examples are often active industry documents.
- 2) The 'firm' in charge of the human grade pet food may not be the same facility throughout the manufacturing process. The workgroup didn't feel that one word captures the whole process, therefore the wording was specifically left vague.
- 3) The workgroup is putting together a frequently asked questions document for the website to help clarify specific scenarios that may arise for firms. This group can certainly include new participation, interested parties should reach out to Austin Therrell as the head of the workgroup. The intent is that this workgroup will stay together for the foreseeable future to address questions/scenarios in a timely manner. The work group will also review for any conflicts in the guidelines that may arise.
- 4) Yes, can be provided via the BIN after appropriate redactions.

PFI also commented they like the approach and support moving quickly with finalizing the process. PFI also supports reengaging and refreshing the human grade workgroup as well as supporting a single affidavit or reduced documentation burden.

George Ferguson mentioned that the AMS Certificate process is similar to the Organic process. Under the AMS Process Verified (voluntary) program, AMS would conduct the audit and if passed, this information along with the products to which it applies would appear on their website as confirmation.

George Ferguson moves that the PFC accept the revised Guidelines for "Human Grade" Claims (APPENDIX A) and recommend them to the BOD for Membership acceptance. Kristen Green seconds. Motion carries.

Copper Workgroup – Dr. William Burkholder, FDA-CVM

Background information regarding copper issues that have been identified in multiple species of animals, including dogs, was presented. At the last meeting, substantiating feeding protocol data was requested from firms to clarify the safety of current copper levels in dogs. The requested internal data from these firms has not been received.

Copper-associated hepatitis has become a fairly well-documented chronic hepatic disease in dogs. While there may be genetic and breed factors also at play, it has become clear that the issue of limiting copper levels (maximums) and limiting certain highly bioavailable copper sources in dog food should be explored.

FDA-CVM held a public listening session in September where the issue of canine copper-associated hepatopathy was presented by Dr. S.A. Center. The FDA followed up with Dr. Center for additional discussions regarding the issue.

The American College of Veterinary Internal Medicine has issued a consensus statement on the diagnosis and treatment of chronic hepatitis in dogs. Additional peer reviewed publications are available as well.

Work on this topic continues by the workgroup and associated recommendations to AAFCO are expected moving forward.

PFLM Implementation Workgroup – Stan Cook, MO

Additional information available in the slides – See APPENDIX B.

The Ingredients and Safety Statement groups have reached consensus and finished the language for changes.

The Facts Box and Nutritional Adequacy groups are still finalizing their work. These groups are meeting on a weekly basis to resolve outstanding issues. The Implementation Workgroup is also meeting with these two teams and hopes to finish up within 6 weeks.

The Implementation Workgroup has:

- (1) Completed a survey of how states adopt new rules into their law and regulations
- (2) Developed models for how to best implement based off of survey results.
- (3) Requested and has compiled industry fiscal impact information and will develop regulatory fiscal impact information.

Moving Forward, the Implementation Workgroup plans to:

- (1) Conduct 50 state calls to emphasize the importance of PFLM and for clarity
- (2) Resurvey states
- (3) Develop education materials
- (4) Develop timelines for implementation

See the slides in APPENDIX B for additional detail regarding:

- Survey results
- PFLM timeline for 2022 February – August timeframe.

New Training and Outreach Sub-Committee - Chris Berg, IA

Upcoming trainings being developed:

- Basic Pet Food Module (awaiting an instructional designer)
- Advanced Pet Food Workshop
- Evaluation of Pet Food Label Module
- Update Pet/Specialty Pet Labeling guide
- Pet Food Forum (May)

Outreach Issues being developed:

- Review the Pet Food Label checklist
- Visit trade shows
- Review both AAFCO pet food websites

An invitation was extended to join the Pet Food Training & Outreach Sub-Committee. Anyone interested should email Chris Berg.

New Agenda Item: Bone Broths – Stan Cook, MO

The AAFCO definition of broth (9.77) contains specific requirements regarding nutritional content. However, a review of several 'bone broth' products reveals that some products do not adhere to the requirements of the definition. In addition, it appears that several products do not appear to adhere to the 95% product name rule in PF3 due to the results of laboratory analysis. Firms should be aware that they are required to meet all state law labeling requirements (most are similar/based off of the AAFCO Pet and Specialty Pet Food Regulations) for new products.

Meeting concluded at 3:00 CT.