

**MINUTES**  
**AAFCO PET FOOD COMMITTEE**  
**AAFCO 2008 MIDYEAR MEETING**  
**San Antonio, Texas**  
**Wednesday, January 30, 2008 3:30 PM – 5:00 PM**

**1. Introductions – Dave Syverson (Chair), MN Dept. of Agriculture**

Chair Dave Syverson called the meeting to order at 3:37 pm. The following committee members and industry advisors were present:

**Committee Members**

Dave Syverson (MN), Chair  
Teresa Crenshaw (DE)

Dr. Rod Noel (IN)  
Roger Hoestenbach (TX)  
Lynn Sheridan (WA)  
Elizabeth Higgins (NM)  
Eric Nelson (WI)  
Dr. Bill Burkholder (FDA-CVM)  
Dr. Cathie Marshall (FDA-CVM)

**Industry Advisors**

Richard Sellers, AFIA  
Jason Vickers, AFIA  
Jarrod Kersey, AFIA  
Nancy Cook, PFI  
Dr. Gail Kuhlman, PFI  
Dr. Angele Thompson, PFI  
Dr. David Dzanis, ACVN, APPMA  
Jan Campbell, NGFA  
David Fairfield, NGFA  
Michael Floyd, Defend Our Pets

**2. Committee Membership & Liaison Update, Announcements**

Dave Syverson introduced and welcomed new committee members: Eric Nelson from the Wisconsin Department of Agriculture and Dr. Cathie Marshall from FDA/CVM. The new industry advisor is Michael Floyd with Defend Our Pets.

Dave Syverson announced the AAFCO Pet and Specialty Pet Food Regulatory Workshop to be held in conjunction with the 2008 Annual Meeting in Nashville on Friday August 1, 2008

**3. Modifications to the Agenda**

Raw Milk Issue and Regulation of Homemade Pet Treats and Pet Food/Treat Bakeries were added to the agenda.

**4. Review of Minutes from 2007 Annual Meeting in Grand Rapids, MI**

Dave Syverson called for any changes or modifications to the minutes. There were no comments, corrections or additions.

## **5. FDAAA Update – Dr. Bill Burkholder, FDA-CVM**

Dr. Burkholder presented an update on the Food and Drug Administration Amendments Act of 2007 (FDAAA).

Title X – Section 1002 – Ensuring the Safety of Pet Food

Section 1002(a) – Two year time frame (by Sept 2009)

Update, Notice Published, Federal Register Vol 73, No 4, Page 225 Monday January 7, 2008 – Public Meeting to be held in early 2008 in the Greater Rockville, MD area. There will be a subsequent notice with exact time and location. Submit comments to Docket #2007N-0487

The AAFCO Board created an FDAAA coordination task force to coordinate the AAFCO response to FDA as well as to receive information from FDA. Eric Nelson has been appointed the chair of this task force. Eric Nelson requested a member of the PFC to be a member of the Task Force. Rod Noel volunteered to be on the task force from the PFC. The task force will draft an initial comment from AAFCO to the docket in the near future.

Dr. Mika Alewynse, the leader of the Nutrition and Labeling Team at FDA CVM announced that two team members have temporarily been assigned to other duties, so requests to the Nutrition and Labeling Team will be significantly slowed down.

Michael Floyd from Defend Our Pets presented comments on FDAAA. Defend Our Pets is a consumer group and is looking forward to participating in the process of drafting those regulations by September 2009.

## **6. Raw Milk Issue** (Referred from Feed Labeling Committee through AAFCO Board of Directors) PFC must determine how this issue will be addressed – by a working group or by the full committee.

At the October 24, 2007 meeting of the AAFCO Board of Directors, it was recommended that the feed labeling recommendations be referred to the PFC to determine if they are in compliance with the Pet Food regulations before being sent to the Model Bill Committee.

Liz Higgins moved to create a working group to process the raw milk issue. The motion was seconded by Teresa Crenshaw and was passed by the committee. Dave Syverson requested two committee members and two advisors volunteer to serve on the working group. The working group is composed of Liz Higgins NM (head of the working group), Eric Nelson WI, Nancy Cook representing PFI, - and Dave Dzanis representing APPMA. Charge given to the working group is to review the raw milk labeling recommendations for any issues that are pertinent to the PFC and determine if there are any conflicts with the pet food regulations.

## **7. Regulation of Homemade Pet Treats and Pet Food/Treat Bakeries** - Lynn Sheridan, WA State Dept. of Agriculture. PFC must determine if the issue meets committee guidelines.

Lynn Sheridan presented a Powerpoint presentation on the proposal to consider alternate regulation paths for cottage pet food industries and pet bakery small businesses.

The purpose of this presentation is to determine if this is a national issue for AAFCO to address; determine a compliance path for states to adopt when working with small businesses; consider a plan of action that would help to inform pet food small business of the registration or licensing requirements for each state; consider formation of a group to research strategies for outreach and technical assistance regarding feed labeling to the pet food small business owners. Angele Thompson as the chair of the Pet Food Commission stated there is a need to get the information out to the cottage industry and encourage them to participate in AAFCO. Michael Floyd stated that a number of consumers rely on the internet to buy their pet foods. Dave Dzanis stated that APPMA has educational tools available. Other areas have exemptions for small businesses, so there is precedent for that. Eric Nelson stated that there is a need to delineate pet food from pet treats. A number of these individuals are using commonly used foods. Bill Burkholder disagreed. He gets at least three calls a week – about 1/3 of these are formulating a pet food not a treat. Nancy Cook stated that PFI gets at least that many calls a week. PFI directs them to a control official, recommends that they buy the AAFCO book and start a checklist. VA put a provision in place in 1994 where manufacturers can register up to 20 products for \$35 apiece and then can register products for no additional fee. States will have to address this. Everybody must play by the same rules. Roger Hoestenbach asked Lynn Sheridan what specifically are you looking for - regulation or education? Dave Syverson asked the committee if this issue meets the criteria and how will we set it up to process it if accepted.

Liz Higgins moved that we accept this as committee business, seconded by Lynn Sheridan. Motion passed. Dave Syverson suggested that a working group be set up. The working group is composed of Lynn Sheridan, WA (head of the working group), Dave Syverson, MN, Dave Dzanis - APPMA, and Angele Thompson - PFI.

## **8. Report from the Calorie Statement Working Group (CSWG) - Dr. Bill Burkholder, FDA-CVM**

Bill Burkholder presented the final report of the CSWG. The proposed regulatory language has been removed from consideration. The specification is made that the proposed regulatory language can be resubmitted for review at a later date. The three PFC members on the CSWG believe that calorie content statements have merit for being mandated to appear on at least some pet food products. The recommendation of the CSWG is that Option 1 be adopted by the full PFC – Option 1 being the full PFC can undertake a thorough study of what pet food products should contain calorie content statements on their labels; what products should be exempted from containing calorie content statements and the means for clearly identifying in which category a given product resides and, the regulatory language for establishing the requirement as well as for verifying and enforcing the requirement. The second option is that the PFC can drop the issue from further consideration.

Bill Burkholder also noted that Title X, Section 1002(a)(3) of the Food and Drug Administration Amendments Act of 2007 mandates that there are updated standards for the labeling of pet food. Thus, even if alterations to AAFCO model regulations are not immediately proposed or

undertaken, the PFC may choose to take this opportunity to determine what consultation AAFCO should give on this specific aspect of pet food nutritional information to the Secretary of Health and Human Services during the drafting and implementation of the mandated federal labeling standards for pet foods.

Motion was made by Roger Hoestenbach and seconded by Rod Noel that the report be accepted. Motion passed. Open for discussion. Lynn Sheridan asked if this is going to be required by federal regulation, but Bill Burkholder stated that at this point in time, the federal regulation is not written but the docket is open for comments. Dave Syverson asked for comments from the proposer. Dave Dzanis stated that it has merit and deserves further consideration. Roger Hoestenbach moved that that Option 1 be accepted. Motion was seconded by Bill Burkholder. Dave Syverson requested a show of hands: For 7; opposed 1 (Liz Higgins); abstain 1 (Rod Noel).

Roger Hoestenbach moved that a new work group be set up to process the recommendation and motion seconded by Eric Nelson. Dave Syverson requested a show of hands: For 8; opposed 1. New work group is composed of Roger Hoestenbach TX (Head), Bill Burkholder FDA/CVM, Lynn Sheridan, WA; Industry Advisors: Dave Dzanis -ACVN, AFIA advisor to be named later; PFI advisor to be named later; and Michael Floyd- Defend Our Pets.

**9. Report from the Working Group for Proposed PF 10(c) Weight Related Terms – Roger Hoestenbach, Office of TX State Chemist**

Roger Hoestenbach suggested that the new Calorie Statement Working Group and the Proposed PF10 Weight Related working group be merged into one working group. It was decided that the two work groups will be merged into one.

**10. Report from the Expert Committees for the NRC Nutrient Requirements of Cats and Dogs - Dr. Bill Burkholder, FDA-CVM**

Bill Burkholder stated that work is progressing

**11. Status of the AAFCO Pet Food and Specialty Pet Food Labeling Guide – Dr. Rod Noel, Office of IN State Chemist & Dave Syverson, MN Dept. of Agriculture**

Rod Noel stated that the revised Pet Food and Specialty Pet Food Labeling Guide is available for sale on the AAFCO website

**12. Update of the AAFCO Pet Food Regulatory Workshop Program** (Scheduled for August 2008 AAFCO Annual Meeting). Dave Syverson reiterated that the Pet Food Regulatory Workshop will be held on Friday August 1, 2008 at the annual AAFCO meeting to be held in Nashville.

Rod Noel moved that the meeting be adjourned and seconded by Roger Hoestenbach. Meeting was adjourned at 5:15 pm.