

MINUTES
AAFCO PET FOOD COMMITTEE
AAFCO 2009 ANNUAL MEETING
Washington, D.C.
Sunday, August 2, 2009 10:30 AM – 12:00 Noon

Teresa Crenshaw (DE) called the AAFCO Pet Food Committee (PFC) meeting to order at 10:30 AM. There were 36 control officials, 58 industry representatives and 14 industry association representatives present for a total of 108 attendees who signed the committee roster.

1. Introduction of Pet Food Committee Members and Advisors

Committee Members

Teresa Crenshaw (DE), Interim Chair
Dr. William Burkholder (FDA-CVM)
Tony Claxton (MO)
Elizabeth Higgins (NM)
Roger Hoestenbach (TX)
Eric Nelson (FDA-CVM)
Dr. Rod Noel (IN)
Jean Bowman (FDA/CVM)

Industry Advisors

Jan Campbell (NGFA)
Nancy Cook (PFI)
Dr. David Dzanis (ACVN, APPA)
Jarrod Kersey (AFIA)
Dr. Angele Thompson (PFI)
Betty McPhee (AFIA)

2. Announcements

There were no announcements.

3. Modifications to the Agenda

Elizabeth Higgins (NM) announced that there is a possibility of a Pet Food Labeling Workshop to be held prior to the next annual meeting in Portland, OR. She asked that this topic be added to the agenda.

4. Reports from the AAFCO PFC Working Groups

A. Report from the Small Pet Food/Treat Manufacturers Working Group - Lynn Sheridan, WA State Dept. of Agriculture

No report was submitted. The working group has not met. Elizabeth Higgins (NM) volunteered to assist Lynn Sheridan as co-chair of the working group, and Tony Claxton (MO) will replace Dave Syverson as a member of the working group. A charge was given to the working group to develop a uniform guidance statement directed towards new pet food manufacturers that can be placed on industry association websites. This link will direct readers to the AAFCO website where additional

information on pet food labeling, product registration, good manufacturing practices, etc., will be available.

B. Report from the Working Group for Weight Related Terms and Calories – Roger Hoestenbach, Feed & Fertilizer Control Services, TX A&M University

Roger Hoestenbach (TX) stated that the name of the working group was changed to the PF10(c) Working Group. The members have been unable to schedule a conference call and will meet immediately after this PFC meeting. Roger said he hopes to have a final report to the full committee at the AAFCO 2010 Midyear meeting. The working group members are Roger Hoestenbach (TX) Chair, Dr. William Burkholder (FDA-CVM), Dr. Rod Noel (IN), Dr. Gail Kuhlman (PFI), Jason Vickers (AFIA) and Dr. David Dzanis (AVMA).

Roger explained that the initial proposal to require a calorie content statement on all dog and cat food labels came from ACVN and was supported by AHA and AVMA. There was also another PFC working group charged to clarify when certain weight related claims would mandate a calorie content statement on the label. PFI developed a revision to AAFCO Model Regulation PF10 in response to concerns about weight related claims. The weight related terms issue was then combined with the charge for the Calorie Working Group.

Dr. Angele Thompson (PFI) said she was unaware that the name of the working group had changed. She felt that placing “Calories” before the “Weight Related Terms” would be a more appropriate name for the working group.

C. Nutrient Profiles and Feeding Protocols Expert Committee - Dr. William Burkholder, FDA-CVM

Dr. William (Bill) Burkholder (FDA-CVM) reviewed the original charge to the working group, and he said the work is progressing. Bill noted that the work of the subcommittees is almost complete except for writing an explanatory document for the changes. Once the review is completed, the working group will submit their recommendations to the full PFC and advisors for review. Bill said he is unsure when the review and modifications will be completed. He said the subcommittees have made good progress over the last year, and he noted that the working group’s recommendations do not dramatically change the values of the AAFCO Nutrient Profiles. Nancy Cook (PFI) commended the committees for their exceptional work.

5. FDAAA Update – Dr. William Burkholder, FDA-CVM

Dr. William Burkholder (FDA-CVM) referred to the comments made by Dr. Bernadette Dunham in her address given during the opening session of the 2009 AAFCO Annual Meeting. The FDA Amendments Act, FDAAA, is moving forward; however the documents must first be reviewed within the agency and the department. He is unsure when the final documents will be available.

6. FDA’s Partnership for Food Protection – Updates from the Workgroup Meeting in Kansas City, MO on May 28-29, 2009

Teresa Crenshaw (DE) noted that many speakers have already mentioned FDA’s Partnership for Food Protection. She said that although the goal is “food protection”, the federal government defines “food” to include feed for animals. Teresa explained that the purpose of this partnership is to develop a well-coordinated, fully integrated system for communication and data sharing among federal, state and local partners. Several representatives from AAFCO serve as members of FDA’s Partnership for Food Protection to ensure that feed is included in the discussions.

Teresa also explained that PETNet, which is the *Pet Event Tracking Network*, meets concurrently with FDA’s Partnership for Food Protection. PETNet was envisioned as a nation-wide system to report disease outbreaks in companion animals or contamination incidents concerning pet food or animal feed. AAFCO Pet Food Committee members serving on PETNet are Elizabeth Higgins (NM) and Dr. Rod Noel (IN).

7. Irradiation and Natural – Update from the AAFCO Feed Terms Investigator, Dr. Rod Noel, Indiana State Chemist Office

Teresa Crenshaw (DE) asked if irradiation fits within the context of the AAFCO feed term “natural” that is defined as *“a feed or ingredient derived solely from plant, animal or mined sources, either in its unprocessed state or having been subject to physical processing, heat processing, rendering, purification, extraction, hydrolysis, enzymolysis or fermentation, but not having been produced by or subject to a chemically synthetic process and not containing any additives or processing aids that are chemically synthetic except in amounts as might occur unavoidable in good manufacturing practices.”*

Dr. Rod Noel (IN) reminded the committee that “natural” is a feed term, and any change to the definition must be presented, discussed and approved by the AAFCO Ingredient Definitions Committee. Teresa added that the PFC meeting might be a good opportunity to provide input on this issue.

Dr. David Dzanis (APPA) provided a PowerPoint presentation of APPA’s recommendation to include “irradiation” in the list of acceptable processes in the

AAFCO definition of “natural”. He also noted that any irradiated products would still have to meet FDA’s requirements (e.g. the radura symbol on the label.) Dr. Dzanis continued that APPA also recommends that “freeze-drying” be included. The APPA proposed revision to the AAFCO defined feed term “natural” is presented as follows with new language shown in red, bold italic print:

Natural. A feed or ingredient derived solely from plant animal or mined sources, either in its unprocessed state or having been subject to physical processing, heat processing, *irradiation, freeze-drying*, rendering, purification, extraction, hydrolysis, enzymolysis, or fermentation, but not having been produced by or subject to a chemically synthetic process, and not containing any additives or processing aids that are chemically synthetic except in amounts as might occur unavoidably in good manufacturing processes.

(Note: Dr. Dzanis’ presentation is included as a separate attachment to these minutes.)

8. Format for Guarantees on Specialty Pet Food Labels – Proposed New Regulation PF4. Expression of Guarantees

The formatting of guarantees for specialty pet food labels was discussed a few years ago with min/max guarantees on pet food labels. When the min/max proposal was dropped, the formatting of guarantees for specialty pet food labels was also dropped. Currently, AAFCO Model Regulation PF4(a)(4) requires that guarantees for specialty pet foods be listed as per the Model (Feed) Regulations. The discussion at the 2009 PFC Midyear meeting recommended that the following proposed language for specialty pet food guarantees be reconsidered:

Regulation PF4(a)(4)

A specialty pet food label shall list other required or voluntary guarantees in the same order and units of the nutrients in an AAFCO-recognized nutrient profile for the specific species; however, if no species-specific AAFCO-recognized nutrient profile is available, the order and units shall follow the same order and units of nutrients in the AAFCO Cat Food Nutrient Profile. Guarantees for substances not listed in an AAFCO-recognized nutrient profile for the specific species of animal shall immediately follow the listing of recognized nutrients and shall be accompanied by an asterisk referring to the disclaimer "not recognized as an essential nutrient by the _____ (Blank is to be completed by listing the specific AAFCO recognized nutrient profile.)" This disclaimer shall appear immediately after the last such guarantee in the same size type as the guarantees. No such disclaimer shall be required unless an AAFCO-recognized nutrient profile is available for the specific species of specialty pet.

The specialty pet food industry changed their labeling to comply with the model feed regulations. If this proposed regulation is approved, the industry will require adequate time to revise their labels.

Dr. David Dzanis (APPA) presented a recommendation from APPA for additional changes to proposed AAFCO Model Regulation PF4(a)(4). These changes would allow “non-essential” guarantees with an asterisk to be listed in the same order as the recognized nutrient guarantees. Dr. Dzanis added that APPA is proposing a similar change to AAFCO Model Regulation PF4(a)(3) for dog and cat food labels.

Dr. Angele Thompson (PFI) stated that this was the first time they heard this proposal. This recommendation would require significant changes to a number of pet food labels. When the original regulation was written, the committee felt it was important to list recognized nutrients first, followed by the non-essential guarantees. PFI and AFIA will look at the proposal and provide comments. Dr. Dzanis recognized that this was a substantial change and agreed there should be a grace period. Nancy Cook (PFI) said the committee approved the recognized nutrients to be listed first, and to change what already exists for the sake of change is unnecessary. Bill Bookout (NASC) questioned the use of glucosamine and chondroitin guarantees in Dr. Dzanis’ example slides. He said these were not AAFCO defined ingredients. Dr. Dzanis said he probably should not have listed glucosamine and chondroitin in his slides, but he thought these ingredients were good examples of non-essential substances that did not fit into any nutrient grouping. Dr. Sharon Benz (FDA-CVM) stated that we should not forget that the consumer is the end user of the label. Using this proposed format would make it difficult to compare labels. Dr. Dzanis said this change would help the consumer by not separating similar guarantees.

Teresa Crenshaw (DE) said that the committee must allow time for comment. A deadline of November 30, 2009 was set for comments so this revisions could be discussed at the January 2010 midyear meeting. Teresa noted that she and Elizabeth Higgins (NM) would distribute the minutes with APPA’s proposed language as soon as possible. (Note: Dr. Dzanis’ presentation is included as a separate attachment to these minutes.)

9. Editorial Change - Correct Numbering Error in Regulation PF10(b)(3)&(4)

Dr. Rod Noel (IN) indicated that this editorial change has already been made.

10. Pet Food Labeling Workshop for 2010 Annual Meeting

Elizabeth Higgins (NM) stated that she was asked to add this topic to the agenda by AAFCO President Kent Kitade. She said Kent suggested the workshop be held prior to the 2010 AAFCO Annual Meeting in Portland, OR. Teresa Crenshaw (DE) stated that the committee would need guidance from the Board for this project. Kris Mantey (The Scotts Company) asked if feed labeling could be included in this workshop. Nancy Cook (PFI) responded that feed labeling

would be an entirely different presentation. Teresa Crenshaw stated that a feed labeling workshop would be a good recommendation for the Board to consider.

Nancy Cook asked FDA about the status of the compliance policy guide on glucosamine and chondroitin. Paul Bachman (FDA-CVM) stated that FDA is still working on this but did not have a specific timeframe for completion.

11. Adjourn Pet Food Committee Meeting

Hearing no other business, Teresa Crenshaw (DE) asked for a motion to adjourn. Dr. Rod Noel (IN) motioned to adjourn the meeting, and Tony Claxton (MO) seconded the motion. The committee approved the motion, and the meeting was adjourned at 11:57 am.