

MINUTES
AAFCO PET FOOD COMMITTEE
AAFCO 2010 ANNUAL MEETING
The Nines Hotel Culture & Fashion
Portland, Oregon
Sunday, August 1, 2010 1:15 PM – 3:00 PM

1. Introduction of Pet Food Committee Members and Advisors

Chair Teresa Crenshaw (DE) called the annual meeting of the AAFCO Pet Food Committee to order at 1:36 pm. The committee members and advisors introduced themselves, and they were:

Committee Members

Teresa Crenshaw (DE), Interim Chair
Dr. William Burkholder (FDA-CVM)
Elizabeth Higgins (NM)
Dr. Rod Noel (IN)
Roger Hoestenbach (TX)
Eric Nelson (FDA-CVM)
Jan Jarman (MN)

Industry Advisors

Jan Campbell (NGFA)
Nancy Cook (PFI)
Dr. David Dzanis (ACVN, APPA)
Jarrod Kersey (AFIA)
Dr. Angele Thompson (PFI)
Richard Sellers (AFIA)
Ed Rod (APPA)

Those committee members present by conference call were:

Nate Bartz (WI)
Tony Claxton (MO)
Lynn Sheridan (WA)
Dave Syverson (MN)

2. Announcements

New members for the Pet Food Committee are Nate Bartz with the Wisconsin Department of Agriculture, Trade & Consumer Protection and Erin Bubb with the Pennsylvania Department of Agriculture. Welcome Nate and Erin!

3. Modifications to the Agenda

There were no changes to the agenda.

4. Approval of Minutes from Redondo Beach, CA

Dr. David Dzanis (ACVN) stated that the last sentence in the bottom of the second page was incorrect: “Dr. Burkholder said that PFC members were in favor but advisors were not.” Dr. Dzanis said this sentence was not correct and should be revised to: “...all members of the working group were in favor and **some of** the advisors were not.”

Dr. Rod Noel (IN) motioned to accept the corrected minutes. Jan Jarman (MN) seconded the motion. The committee approved the motion.

5. Reports from the AAFCO PFC Working Groups

A. Small Manufacturers Working Group - Lynn Sheridan, WA State Dept. of Agriculture & Elizabeth Higgins, NM Department of Agriculture

Liz Higgins (NM) presented the new website that will provide information for new pet food manufacturers unfamiliar with the regulations for pet food. Melinda Walsh (IN) assisted with the presentation. The website was not yet available to the public but should be ready by January 2011. Eric Nelson (FDA-CVM) suggested that AAFCO advertise to let as many people as possible know about the website. Dr. Angele Thompson (PFI) stated that the website would be advertised through various associations, magazines and website links. Nancy Cook (PFI) said that PFI will place a link to the new website on their website. It was suggested that the committee develop a press release to advertise through green grocers, farmers markets and other associations. Roger Hoestenbach (TX) suggested that the committee also contact cooperative extension at land grant universities. Liz Higgins agreed that promotion of the website would be the next step.

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

Dr. Burkholder (FDA-CVM) stated that the subcommittee had not finalized the recommendations for updates to the AAFCO Nutrient Profiles. Dr. Burkholder said the values for the Nutrient Profiles, the preamble and the verbiage are in draft form. The document had been given to the full committee for review. Both subcommittees have completed their work but it had been difficult for all members to get together for the final approval. Dr. Burkholder said the plan was to let the subcommittee work on the report until the midyear meeting, and the document would then be forwarded to the full Pet Food Committee for review. Dr. Angele Thompson (PFI) gave her appreciation to Dr. Burkholder. She said the report was 22 pages, and there had been a tremendous amount of work and thought put into this document.

Dr. Burkholder noted that the subcommittee did discover two problems in the AAFCO Official Publication that was pertinent to the Nutrient Profiles. He said this would be known when the document was presented to the committee. He said the current maximum value for iodine, 50 mg/kg, in the dog food nutrient profile and the reference to the iodine value (pages 147 and 148 of the AAFCO 2010 Official Publication) should be revised. Dr. Burkholder also noted a problem with Table 2 for mineral contaminants on page 271 of the AAFCO Official Publication. Richard Sellers (AFIA) stated that the new

NRC minimum tolerances did not take into account human tolerances, and AFIA felt that not having human food tolerances was of concern for feed for food-producing animals. Richard Sellers said Dr. Burkholder should be the one to send this observation to the AAFCO Board of Directors. Roger Hoestenbach (TX) stated that the Feed Contaminant Committee is looking at this. Dr. Sharon Benz (FDA-CVM) stated that the values in the 2005 publication were being reviewed, and a recommendation for revisions to the table would be coming. These recommendations should be ready by the next meeting, so this issue would be addressed.

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

Dr. Burkholder (FDA-CVM) stated that he had no new information regarding the progress of the FDA Amendments Act.

6. **AAFCO Pet Food Labeling Workshop Update** – Elizabeth Higgins, NM
Department of Agriculture

Liz Higgins (NM) said that the workshop was scheduled for January 17, 2011, just prior to the AAFCO 2011 Midyear Meeting. The workshop was being sponsored by AAFCO in cooperation with PFI and AFIA. The Coordinating Committee members were Chair Liz Higgins (NM), Jan Jarman (MN), Meagan Davis (KY), Nancy Cook (PFI), Angele Thompson (PFI), Jason Vickers (AFIA), and Jarrod Kersey (AFIA).

7. **Carbohydrate Claims for Pet Food and Specialty Pet Food – Recommendation of the AAFCO Feed Labeling Committee**

Teresa Crenshaw (DE) explained that Richard Ten Eyck had passed the draft language for carbohydrate claims for pet food from the Feed Labeling Committee to the Pet Food Committee. Richard Ten Eyck (OR) said that he would be the technical advisor, and he would be available if the committee had any questions. Teresa Crenshaw stated that a working group would be formed, and Jan Jarman had volunteered to chair this group. Members of the Carbohydrate Working Group include Chair Jan Jarman (MN), Dr. Bill Burkholder (FDA-CVM), Erin Bubb (PA), Dr. Dave Dzanis (APPI), Angele Thompson (PFI), and a representative from AFIA who would be named later. Teresa Crenshaw said that another control official could be added to the working group if needed.

Roger Hoestenbach (TX) moved that the Carbohydrate Working Group be formed. Dr. Rod Noel (IN) seconded the motion. The committee approved the motion.

8. **Review and Discussion of the Recommendation of the Working Group for Weight Related Terms and Calories**

Roger Hoestenbach (TX) discussed the final recommendation of the Working Group for Weight Related Terms and Calories. He said this issue had been discussed since

2005, and the working group found sound reason to approve the proposal from ACVN. The working group addressed the concerns of the Small Manufacturers Working Group and industry's concerns about a phase-in period. The voting members of the working group were unanimous in their decision. The report was submitted one week prior to the AAFCO 2010 Midyear Meeting in Redondo Beach, CA, and now the Pet Food Committee members have had six months to consider the report. He would be open to questions and comments.

Jan Jarman (MN) said that she had some concerns. She noted there was a reduction in the burden of data for calculating the modified Atwater formula. The proposal required only one analysis as compared to four different batches that is currently required in the pet food regulations. She said the proposal required a calorie content statement on labels of products that had significant calories, but there was an exemption for dog or cat food that contained no more than 500 kcal ME/kg. Companies would have to provide evidence that the product met the exemption, so they would still have to calculate the calorie content. It was explained that the exemption was more for products that were expected to add little nutrition to the diet, such as pet waters and supplements. Jan Jarman said the 500 kcal exemption would be too low for most dog treats and therefore of no help to small manufacturers. Dr. Dzanis (ACVN) explained that there would be an explanation for calculating calorie content on the new pet food section of the AAFCO website, so he did not believe this would be a tremendous burden.

Roger Hoestenbach said that many commercial labs have a package for protein, fat, fiber, moisture, and ash, so cost would not be an issue. The 500 kcal ME/kg level is an arbitrary number. Jan Jarman asked if anyone had talked with the labs, and Roger Hoestenbach stated that he had talked to five or six labs, and all said they did have a package price. Dr. Angele Thompson (PFI) stated that labs do have packages for a proximate analysis, but they typically do not calculate calories. Jan Jarman said her concern was that most packages do not include ash and a calculation for calories.

Liz Higgins (NM) stated that she is adamantly opposed due to the burden on both industry and regulators for mandating calorie content statements on all pet food labels. She agreed that such statements should be on any product label with weight related terms as required in AAFCO Model Regulation PF10, but she did not agree that it was necessary for all pet food labels. She said that she would like to propose an alternative to this proposal.

Dr. Burkholder (FDA-CVM) stated that calorie content statements are important information and should be the first information viewed on the label. Jan Jarman asked if there had been discussion about the level of benefit versus burden for consumers, regulators, and the industry. Dr. Dzanis responded that the working group did consider the costs and the benefits. He said a survey showed that 97% of veterinarians and consumers wanted calorie information.

Richard Sellers (AFIA) asked if there was an analytical variation for calories. Roger Hoestenbach stated there was not. Richard Sellers said that FDA was questioning why humans are not using calorie information on food labels. He asked why would humans pay attention to this information for their pets when they do not for themselves.

Nancy Cook (PFI) said that in the past, companies had to beg to put calorie content statements on pet food labels. Dogs and cats with different lifestyles need different levels of calories. How many calories would an animal need everyday? Dr. Angele Thompson (PFI) agreed that there had been a moratorium for several years prohibiting calorie statements on pet food labels. She asked how many people take their pets to the veterinarian. She said most pet owners are not getting feeding recommendations from a veterinarian.

Liz Higgins (NM) reiterated that putting calories on all labels is unnecessary and over-regulation unless claims are made. The majority of people in the US do not look at calorie statements.

Larry Hawley, Del Monte Pet Food Company, said most veterinarians receive minimal nutrition training. He said there were flaws in this regulation. The variation is not addressed, the regulation is based on average values, and averages are based on sampling. If the product is not sampled properly, then the analyses will not be accurate. There will be the chance that calories would be calculated from the guaranteed analysis. He said this regulation should be revised. Dr. Dzanis stated that he disagreed with the statement that most veterinarians do not receive adequate nutrition training.

Roger Hoestenbach moved that the recommendations made by the working group be accepted. Eric Nelson (FDA-CVM) seconded the motion. Chair Teresa Crenshaw asked for discussion. Jan Jarman said that she would like to consider voting separately on PF9 and PF10 as the controversy was with PF9 and not with PF10. Dr. Bill Burkholder (FDA-CVM) stated that they could not be voted on separately. He said he saw adequate representation in the room from industry and regulators but not consumers. Since consumer input is lacking on this issue, he said comments about the consumer should be disregarded. He called for the question for the motion on floor. The final vote was: in favor of the motion – five at the table and two by conference call – for a total of seven; against the motion – one at the table and two by conference call – for a total of three. The motion to accept the recommendation of the working group was approved.

Chair Teresa Crenshaw noted that the committee had not had time to discuss the specific language of the motion and would do so at the next meeting, but she cautioned that there would be no discussion about the intent of the regulation.

10. Adjourn Pet Food Committee Meeting

Roger Hoestenbach (TX) motioned to adjourn. Dr. Rod Noel (IN) seconded the motion. The meeting was adjourned at 3:13 pm.