

Pet Food Committee Report/Minutes

July 27, 2014

10:15 – 12:00 pm PDT

Sacramento, CA

COMMITTEE RECOMMENDATIONS:

1. The Pet Food Committee (PFC) recommends that the Board of Directors (BOD) accept the revised AAFCO Pet Food Regulations Label Review Checklist, to entirely replace the current Checklist on pages 195 to 200 of the 2014 Official Publication (OP).
- 2.

BOARD RECOMMENDATIONS:

- 1.
- 2.

ASSOCIATION ACTIONS:

- 1.
- 2.

Committee Participants:

Members: Sam Davis (SC), Katie Brenner (ID), Lizette Beckman (WA), William Burkholder (FDA/CVM), Charlotte Conway (FDA/CVM), Dave Phillips (ND), Liz Higgins (NM), Stan Cook (MO), Jan Jarman (MN), Kristen Green (KY)

Advisors: Jessica Meisinger (NRA), Charles Starkey (PPFC), Pat Tovey (PFI), Angele Thompson (PFI), Susan Thixton (AFTP), Dave Dzanis (APPA/ACVN), Jean Hofve (PWA), Leah Wilkinson (AFIA), Megan Kosky (AFIA), Angela Mills (NGFA), David Fairfield (NGFA)

123 Additional Control Officials, Industry Representatives and Guests attended.

Committee Report:

- *Committee Activities*

ACTION: Following a discussion and comment period, the Committee held an e-vote on July 2, 2014 on the revised Dog and Cat Food Nutrient Profiles.

MOTION: Johanna Phillips moved that the Pet Food Committee accept the revised Dog and Cat Food Nutrient Profiles as amended from the Canine Nutrition Expert Subcommittee report, and recommend the same to the Model Bills and Regulations Committee for passage. The motion was seconded by Kristen Green. The motion passed.

ACTION: Because of the revisions to the AAFCO Dog and Cat Food Nutrient Profiles, the Pet Food Committee recognizes that additional revisions to the Pet Food Model Regulations may be necessary to clearly differentiate which profile values apply to specific growth and all-life-stages products for



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dogs. The PFC also wants to consider issuing a recommendation for an implementation specific compliance date for products claiming nutritional adequacy based on the product being formulated to meet the revised AAFCO Dog and Cat Food Nutrient Profiles. Both issues should be reviewed and recommendations formed by a new working group.

MOTION: Liz Higgins moved that a working group be formed to look at revisions needed in the Pet Food Model Regulations based on changes to the AAFCO Nutrient Profiles as well as consider a recommendation for implementation of the revised profiles. The motion was seconded by Sam Davis. The motion passed.

ACTION: The Pet Food Labeling Checklist Working Group submitted the final draft revisions to the Checklist.

MOTION: Liz Higgins moved that the Pet Food Committee accept the revised Pet Food Labeling Checklist to replace pages 195-200 in the printed 2014 Official Publication (OP) and recommends the same to the Board of Directors (BOD) for acceptance by the membership and inclusion in the AAFCO OP. The motion was seconded by Sam Davis. The motion passed.

ACTION: Revisions to the Tartar Control Guidelines (on page 148 of the 2014 OP) should be considered by the committee at the next AAFCO meeting.

MOTION: Stan Cook moved that a review of the language of the Tartar Control Guidelines be added to the agenda for the 2015 mid-year meeting in San Antonio. The motion was seconded by Sam Davis. The motion passed.

Committee Minutes:

Meeting called to order on July 27, 2014 at 10:20 AM PDT.

Announcements:

Jenny Bibb (MS) and Johanna Phillips (ID) have left the Pet Food committee (PFC) and are pursuing other opportunities. Katie Brenner (ID) has joined the PFC as a member. Sam Davis (SC) is the new BOD liaison and replaces Doug Lueders (MN) in this post. Lonnie Boyd has joined as the alternate advisor representing the Association for Truth in Pet Food, and Molly Morrisette will be serving as the alternate advisor for the Pet Welfare Alliance.

Administrative Business:

- Committee report/minutes structure: Jan Jarman (MN) provided details on the new committee report structure.
- Feed BIN: PFC is going to start using the Feed BIN for committee work. All committee members/advisors have been granted limited access to the Feed BIN by the BOD to perform committee functions. Kristen Green is the PFC contact for Feed BIN questions. There is no set date to begin performing committee work on the site, but this information will be announced when determined and e-mail notifications will be sent.
- Submission of Agenda Items: Should be according to page 94 of the Committee Issues section of the 2014 printed AAFCO OP. An example as well as any additional information concerning submission of agenda items will be made available to the committee and posted in the PFC library on the Feed BIN. A reminder for submission of agenda items will be sent prior to the

deadline for the 2015 mid-year meeting.

Revised Dog Food Nutrient Profiles:

- Jan Jarman (MN) explained that the PFC held a comment period and an e-vote after the 2014 mid-year meeting (New Orleans) to specifically address the maximum calcium (Ca) value for growth and reproduction of dogs. The Nutrient Profiles that were passed by the Model Bills and Regulations Committee (MBRC) in New Orleans called for a maximum Ca value of 1.8% for growth and reproduction of all size dogs. The Dog Food Nutrient Profiles were returned to the PFC for further consideration by the BOD after the mid-year meeting. An e-vote was held with a result that the maximum Calcium value was adjusted to 1.8% for only large size dogs (for growth) and remained at a maximum 2.5% for all other life stages and sizes of dogs. Large size dogs are defined as those animals with a mature lean adult weight of 70lbs or greater. These maximum calcium values reflect those originally proposed by the Canine Nutrient Expert Subcommittee. It is the intent of the PFC to provide the revised AAFCO Dog and Cat Food Nutrient Profiles to the MBRC for their consideration before the 2015 mid-year meeting. The profiles will be posted in the online and print editions of the *Official Publication* once they pass the general membership and implementation will be required on a state by state basis although AAFCO may recommend a specific compliance date. The revised Dog Food Nutrient Profiles appear in APPENDIX A.
- Revisions to the Model Regulations for Pet and Specialty Pet Food Under the Model Bill: It was moved to form a working group to look at revisions that may be necessary to the Pet Food Model Regulations based on the revised AAFCO Dog and Cat Food Nutrient Profiles and for this working group to consider issuing a recommendation for a date by which products bearing a formulated-to-meet nutritional adequacy statement would need to be compliant with the revised profiles. Doug Lueders explained that as additional changes will need to be made to the Pet Food Model Regulations based on changes to the AAFCO Dog and Cat Food Nutrient Profiles, the Model Bill and Regulations committee will likely hold the Nutrient Profiles until the suggested revisions to the Regulations are ready. The working group established to consider revisions to the Model Bill and the implementation timeline includes: Kristen Green (chair), Susan Thixton, Jean Hofve, Leah Wilkinson, Angele Thompson, David Meeker, Dave Dzanis, Liz Higgins, William Burkholder, Katie Brenner, Lizette Beckman.

Reports from Working Groups:

- The Business of Pet Food and AAFCO Talks Pet Food Websites – A new working group chair for the Business of Pet Food website review is required now that the previous chair Jenny Bibb has left PFC. Richard TenEyck (OR) informed the committee that the AAFCO Talks Pet Food website was drafted by a consultant and is available for review by the PFC. The BOD would like the site to be made public as soon as possible. Comments were made that a working group composed of PFC and advisors should review the site for content and a style level appropriate for the general public. Lizette Beckman (WA) will chair this working group.
- Carbohydrate Working Group – Jan Jarman explained that the working group is developing proposed wording for an NFE statement to address a desire for presenting carbohydrate information on the label. No text was shared with PFC as the proposal has not been finalized.
- AAFCO Pet Food & Specialty Pet Food Labeling Guide and Label Review Checklist Workgroup – This working group needs a new chair now that the previous chair Johanna Phillips has left the PFC. The checklist has been completed and was voted to be sent to the BOD for a vote by the



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membership for its inclusion into the Official Publication during this meeting. Work on the Pet Food Labeling Guide has started. Other than the chair, the membership of the Pet Food Labeling Guide and Checklist working group has not changed. Charlotte Conway (FDA/CVM) volunteered to chair the committee. The final Label Review Checklist appears in APPENDIX B.

Clarification of Items in the Model Regulations for Pet and Specialty Pet Food Under the Model Bill:

- AAFCO Guidelines for Tartar Control Claims – Dave Phillips (ND) had raised the issue of unqualified tartar control claims on labeling where mechanical action is the means of tartar control but not specified on the labeling. This makes it difficult for consumers to understand the mode of action and for regulators to evaluate the tartar control claims. The guidelines for tartar control claims (available on page 148 of the 2014 AAFCO OP) in the Model Regulations do not specifically state that the mode of action must be stated on the labeling. Susan Thixton commented that the language regarding low priority enforcement for such claims is confusing and should be revised. Dr. Chavez asked if AAFCO couldn't incorporate VOHC guidelines for tartar control. Jan Jarman responded that those guidelines are not administered by a regulatory body. Bill Burkholder further clarified that VOHC results can be used to substantiate tartar control claims. Jan Jarman brought up an additional point that the text concerning the role of FDA/CVM should be modified to represent these as AAFCO Guidelines. The PFC voted to consider this issue at the San Antonio mid-year 2015 meeting.
- Regulation PF2 (c). Use of vignettes, graphics or pictorial representations – Agenda item not addressed due to time constraints.
- Regulation PF5 (d) (3). References to quality or grade of ingredients in the ingredient statement – Agenda item not addressed due to time constraints.
- Reminders/deadlines – Agenda item not addressed due to time constraints.

Sam Davis moved to adjourn the PFC meeting. Liz Higgins seconded the motion. The motion passed.
Pet Food Committee Adjourned at 11:52 AM (PDT).

Action Item Table:

Responsible	Item	Action	Timing / Status
Jan J.	Revisions to Tables in PF2(i) & PF3(c)	Submitted to MBRC 04-01-14	On MBRC Agenda 2015 Midyear
Jan J.	Revised Dog & Cat Food Nutrient Profiles	Submitted to MBRC 09-26-14	MBRC will wait for related revisions to Model PF Regulations
Kristen G.	Revisions to Model PF Regulations related to Revised Nutrient Profiles	Submit Working Group Report to PFC for consideration	Anticipated 10-01-14
Lizette B.	"AAFCO Talks Pet Food" website	2 nd draft of revisions	10-3-14
Jan J.	Carbohydrate Working Group report	Submit to PFC for consideration	2 mos. prior to 2015 Midyear Meeting



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Responsible	Item	Action	Timing / Status
Charlotte C.	PF/SPF Labeling Guide revisions	Submit first drafts to WG Chair	Ongoing
Jan J.	Revisions to Tartar Control Guidelines	Submit to PFC as agenda item	2 mos. prior to 2015 Midyear Meeting
Jan J.	Unclear/ambiguous Model PF Regulations	Submit to PFC as agenda item	2 mos. prior to 2015 Midyear Meeting
Jan J.	Instructions for submitting agenda items	Post on Feed BIN & AAFCO site	10-01-2014



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Appendix