



FINAL 3/3/2015

PFC Committee Report/Minutes
AAFCO Midyear Meeting
January 15th 2015, 8-10 am; San Antonio, TX

Committee Recommendations

Committee recommendation summary or list.

- (1) PFC recommends to the BOD that the Pet Food Committee not be combined with the Feed Labeling Committee.
- (2) PFC requests funds from the BOD to hire a consultant for tone and grammatical consistency of the AAFCO Talks Pet Food website. A formal request will be made at the BOD meeting following the AAFCO Midyear meeting.

Board Recommendations

Board recommendation summary or list.

- (1)
- (2)

Association Actions

Association action summary or list.

- (1)
- (2)

Committee Participants

Members Present: Stan Cook (MO), Kristen Green (KY), Charlotte Conway (FDA-CVM), Lizette Beckman (WA). On Conference call: Jan Jarman (MN), Liz Higgins (NM), Natasha Hedin (MN), Bill Burkholder (FDA-CVM), Katie Brenner (ID).

Advisors Present: Susan Thixton (ATPF), Dave Dzanis (ACVN/APPA), Angela Mills (NGFA), Leah Wilkinson (AFIA), Jason Vickers (AFIA), David Fairfield (NGFA), Pat Tovey (PFI), Angele Thompson (PFI), Jessica Messinger (NRA), Charles Starkey (PPFC). On Conference call: Jean Hofve (PWA).

56 Regulatory Officials and 112 Industry and Consumer representative attended the 2015 Midyear Pet Food Committee meeting.

Committee Report

Committee Activities

ACTION: Pet Food Committee intends to hold another Pet Food Labeling Workshop.

MOTION: Liz Higgins (NM) moved that the Pet Food Committee form a Work Group to plan a Pet Food Labeling Workshop in January 2017 in conjunction with the Mid-year AAFCO meeting. Kristen Green (KY) seconds. Motion passes.

ACTION: The revised Dog and Cat Food Nutrient Profiles, associated revisions to the Pet Food Model Regulations (PF&) and proposed delayed implementation language have been passed by the Pet Food Committee. The associated Working Group should now be disbanded.

MOTION: William Burkholder (FDA-CVM) moves to disband the Dog Food Nutrient Profile Working Group. Liz Higgins (NM) seconds. Motion passes.

ACTION: PFC discussed the need to review the AAFCO Talks Pet Food website for tone and grammatical consistency. A consultant has been identified and provided an estimate for this service. Funds should be requested from the BOD.

MOTION: Kristen Green (KY) moves request the BOD for funds to hire a consultant to conduct a tone and grammatical review of the AAFCO talks Pet Food website. Charlotte Conway (FDA-CVM) seconds. Motion passes.

Committee Minutes

PFC Membership

The PFC recognized the efforts of former Chairs and Co-Chairs Liz Higgins (NM) and Jan Jarman (MN) in providing leadership and service to the Committee. The Board of Directors (BOD) presented Certificates of Appreciation. The PFC also introduced Natasha Hedin (MN) as a new member of PFC and informed the committee of the retirement of Sam Davis (SC) who was previously the BOD Liaison. Kristen Green (KY) is acting as the new BOD Liaison.

BOD Questionnaire on Current Committee Structure

The PFC feels that combining the Feed Labeling Committee with the Pet Food Committee is not a good idea. The PFC already has sufficient work and a focused purpose, and combination of these committees would create increased workload and a strain on focus and resources for the committee.

Revisions to the Model Regulations for Pet and Specialty Pet Food and Delayed Implementation Language Workgroup.

Kristen Green (KY) gave an update on the concluded activities of this Workgroup. Proposed revisions to the Model Regulations for Pet and Specialty Pet Food based on the recently revised Dog and Cat Food Nutrient Profiles were completed by the Workgroup and passed the Pet Food Committee in an October e-vote. In addition, delayed implementation language was also drafted and passed the Pet Food Committee in an October e-vote. The revisions which were sent to the Model Bill and Regulations Committee and the delayed implementation language which was sent to the BOD were presented and are available in APPENDIX A and APPENDIX B.

Pet Food Labeling Workshop

It was agreed that another Pet Food Labeling Workshop is warranted, regardless of whether the Federal Pet Food Labeling regulations have published by time of the workshop. A Workgroup was formed to put together this event with the intention of holding it in January 2017 at the mid-year meeting. This Workgroup will need to work with the Education and Training Committee in planning this event. The PFC will approach the BOD about getting funding approved for a Project Manager to manage the Workgroup charged with planning the Pet Food Labeling Workshop. The Workshop is tentatively planned to coincide with the mid-year 2017 AAFCO meeting, at which time the Pet Food and Specialty Pet Food Labeling Guide revision will also have been completed. The following members, advisors and/or advisor groups volunteered to participate in the Workgroup:

AFIA representative, Jean Hofve, Angele Thompson, Katie Brenner (ID), PFI Representative, Dave Dzanis, Jan Jarman (MN), Natasha Hedin (MN), Kristen Green (KY), Liz Higgins (NM), William Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM).

AAFCO Talks Pet Food Website

Lizette Beckman (WA) informed the PFC that all sections of the "AAFCO Talks Pet Food" website have undergone a review by a member of the working group. The working group as a whole was concerned about tone and consistency throughout the website. A consultant was identified through contacts at Purdue University, and a cost estimate to perform the work was obtained. The PFC voted to approach the BOD for the funds needed to have this work completed.

Carbohydrate Workgroup

Jan Jarman (MN) advised that the report from the Workgroup should be available in February.

Labeling Guide Workgroup

Charlotte Conway (FDA-CVM) advised the PFC that the Workgroup work continues, and that assignments will be sent out shortly after the meeting. It was discussed that the clarification items from the 2015 mid-year agenda should be considered for clarification in the Labeling Guide during the review process. The



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working group will provide the draft labeling guide to the PFC prior to the annual 2015 meeting if possible to enable time for review and comment. The final document will be provided for consideration of the BOD at the October 2015 BOD meeting.

Product Registration Standardization Workgroup

Pat Tovey gave a presentation summarizing the results of a survey on state registration processes.

32% were reported to have a smooth process. These are states that have either standardized their process to be user-friendly or simply have had a process in place already that is efficient for their needs.

Proper technical support is in place for registration procedural issues.

25% fell into a moderate category. These states are either working through an update to their system, or need to consider the value of a more user friendly system. We'd ask that if your state falls into this category, please reach out and open up communication with a WG member.

43% were considered challenging. This would imply that it is labor intensive and is a problematic to complete within a 1-2 workday timeframe in order to get payments processed in time. In many cases this category indicates a lack of industry/state communication.

Working Group Contact: Debra Roehrig - debra.roehrig@purina.nestle.com

Tartar Control Claims

Jan Jarman (MN) provided proposed language to revise the AAFCO Guidelines for Tartar Control Claims (p. 147 of the 201 print OP) in order to: Include a recommendation that the method or mechanism of achieving a product's intended dental health effects be specified in the claim and remove references to FDA and CVM. The proposed language is available in APPENDIX C. Discussion included how to include mechanical as well as sodium hexametaphosphate as well as revisions needed to item (5) to come into agreement with FDA practices. Discussion included the role and benefit of the Veterinary Oral Health Council (VOHC) in substantiating tartar and plaque control claims, issues regarding the availability of utility data for ingredients that may or may not be defined for plaque/tartar control purposes, and consumer awareness of the mode of action for such claims. It was decided that a Workgroup should be created to revise the proposed language for the AAFCO Guidelines based on the discussion. The following members, advisors and/or advisor groups volunteered to participate in the Workgroup: AFIA representative, PFI representative, APPA representative, Jan Jarman, FDA representative, VOHC representative. The Workgroup will plan to have revised language available to the PFC by April 1st, 2015.

Discussion of Unclear or Ambiguous Items in the Model Regulations

Jan Jarman (MN) led a discussion about the background behind certain items in the Model Regulations. No action was proposed to address these ambiguous items, with the aim of the discussion to gain a better understanding of the original intention of each regulation.

Regulation PF5 (d) (3). References to quality or grade of ingredients in the ingredient statement (related – use of labeling references to USDA inspection) – It was clarified that this item was intended to address the use of such grades as 'USDA Grade A' beef, etc., or the use of specific human food language. Dave Dzanis stated that while the ingredient list should not be used as a marketing tool, there is some concern that this regulation is being over-applied by regulators. He agreed that we need to come to a consensus on what "quality" means.

Regulation PF2 (c). Use of graphics & pictorial representations in labeling – Jan stated that it is sometimes difficult to define misleading vs. non-misleading graphics. Dr. Burkholder said that labeling graphics must represent the contents of the product. The question to ask is if the graphic, in context of the whole label, is misleading.

Time did not allow for additional discussion of other ambiguous items as presented. Items will be tabled and maintained for future meetings as needed.

Action Item Table

Responsible	Item	Action	Timing/Status
Jan J.	Revised Dog & Cat Food Nutrient Profiles	Submitted to MBRC 09-26-14	Completed
Kristen G.	Revisions to Model PF Regulations related to revised Nutrient Profiles	Submit WG Report to PFC for consideration, PFC vote 10.2014. Pass to MBRC.	Completed
Kristen G.	Implementation language for Revised Nutrient Profiles	Submit WG Report to PFC for consideration, PFC vote 10.2014. Submitted to BOD.	Completed
Jan J.	Revisions to Tartar Control Guidelines	Submit to PFC as agenda item	Completed
Jan J.	Unclear/ambiguous Model PF Regulations	Submit to PFC as agenda item	Completed
Jan J.	Instructions for submitting agenda items	Post on Feed BIN & AAFCO site	Completed
Lizette B.	AAFCO Talks Pet Food website	2 nd Draft of revisions; arrange for consultant for website grammatical review	Ongoing, deadline for completion of site is May 2015
Jan J.	Carbohydrate Workgroup report	Submit to PFC for consideration	Report due February 2015
Charlotte C.	PF/SPF Labeling Guide Revisions	Submit first drafts to WG chair; follow-up assignments to be sent shortly after midyear meeting.	Ongoing. Goal is to have the guide in draft status before 2015 Annual with a final product ready for the BOD in Oct 2015.
Jan J.	Revised Tartar Control WG	Work group to provide revised AAFCO Tartar Control Guidelines to the PFC for consideration before Annual 2015	Language due to PFC by April 1 st .
Kristen G.	Provide feedback to BOD on committee structure questionnaire	Provide feedback to BOD	Completed 1.15.2015

APPENDIX A

**Pet Food Committee
PF7 Revisions and Delayed Implementation Working Group
October 21, 2014**

Proposed revisions for PF7 of the Model Regulations for Pet and Specialty Pet Food
To be placed on pages 142 – 143 of the 2014 AAFCO OP (print version)

Regulation PF7. Nutritional Adequacy

- (a) The label of a pet food or specialty pet food which is intended for all life stages and sizes of the pet or specialty pet may include an unqualified claim, directly or indirectly, such as “complete and balanced”, “perfect”, “scientific”, or “100% nutritious” if at least one of the following apply:
- (1) The product meets the nutrient requirements for all life stages and sizes established by an AAFCO-recognized nutrient profile; or
[...]
- (b) The label of a pet food or specialty pet food which is intended for a limited purpose (such as size of dog) or a specific life stage, but not for all life stages and sizes, may include a qualified claim such as “complete and balanced”, “perfect”, “scientific”, or “100% nutritious” when the product and claim meet all of the following:
[...]
- (c) [...]
- (1) [...] The claim shall be stated verbatim as one of the following:
- A. “(Name of product) is formulated to meet the nutritional levels established by the AAFCO Dog (or Cat) Food Nutrient Profiles for _____.” (Blank is to be completed by using the stage or stages of the pet’s life, such as gestation/lactation, growth, maintenance or the words “All Life Stages”). For a dog food, when the blank includes the words “Growth or “All Life Stages”, one of the following phrases must also be added verbatim to the end of the claim:
- i. “including growth of large size dogs (70 lbs or more as an adult)” if the product has been formulated to meet the levels of nutrients specifically referenced in the Dog Food Nutrient Profiles as being applicable to large size growing dogs.
- ii. “except for growth of large size dogs (70 lbs or more as an adult)” if the product has not been formulated to meet the levels of nutrients specifically referenced in the Dog Food Nutrient Profiles as being applicable to large size growing dogs; or
- B. [...]



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APPENDIX B

Pet Food Committee PF7 Revisions and Delayed Implementation Working Group October 21, 2014

Delayed implementation of revised Nutrient Profiles and PF7

To be inserted in the print version of the Official Publication section titled "Changes in the ____ AAFCO Official Publication" at the same time the revised Dog and Cat Food Nutrient Profiles and PF7 are published:

The Pet Food committee recommends that the revisions to the AAFCO Dog and Cat Food Nutrient Profiles not be enforced until 12 months for new products in development and 24 months for existing products after publication of the revised AAFCO Dog and Cat Food Nutrient Profiles in the print version of the AAFCO OP.

The Pet Food committee also recommends that the revisions to PF7 of the Pet Food Model Regulations for Pet and Specialty Pet Food Under the Model Bill not be enforced until enforcement commences for the revised AAFCO Dog and Cat Food Nutrient Profiles.

Delayed enforcement and implementation of the revised PF7 language for nutritional adequacy statements would allow nutritional adequacy statements on products in the market place to be either: verbatim as shown in 2014 OP hard copy, or verbatim as shown in the OP hard copy containing the revised nutrient profiles, until 24 months after publication of the revised nutrient profiles at which time the statement must be as verbatim in the revised PF7.

APPENDIX C

Pet Food Committee

Proposed Revisions to the Tartar Control Guidelines (p. 148 of the 2014 print OP)

The AAFCO Pet Food Committee supports and recommends the following guidelines ~~as developed by the Center for Veterinary Medicine of the U.S. Food and Drug Administration~~ for dental health claims with respect to rawhides, biscuits, and other pet food products:

- (1)
- (2) Foods bearing claims for plaque or tartar reduction or prevention, or control of breath odor may be misbranded. However, if these claims are made only with respect to the products' abrasive action, enforcement would be a low priority. ~~Thus, CVM is exercising discretion by not objecting to these types of claims at this time.~~
- (3)
- (4)
- (5)
- (6) The labels of foods bearing dental health claims must state the method or mechanism by which the intended effects are achieved.

OR

- (6) The labels of foods bearing dental health claims must state the method or mechanism by which the intended effects are achieved, in juxtaposition with the largest or most prominent use of the claim on each panel of the label on which the claim appears, in the same style and color print and at least one-half the size of the claim.