



Proposed Revision to PF7 & Feeding Protocols (ATTACHMENT F)

Pet Food Committee Recommendation:

The PFC recommends that the following revisions be considered by the MBRC for integration into the AAFCO Official Publication.

Background

Revising requirements to the Feeding Protocols to account for the special nutritional requirements for growth of large size dogs. DRAFT language.

Note: Revised for correct formatting, clarity and plain language, and to include wording to be placed in the Protocols Section of the OP.

Workgroup Recommendations:

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
 - (2) The product meets the criteria for all life stages as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol(s);
 - A. Unqualified claims of nutritional adequacy that include large size dogs can be substantiated by completing the appropriate protocols using large size dogs; or
 - B. Can be substantiated by completing the appropriate protocols using dogs less than 70 lbs. adult weight while containing no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles; or
 - (3) The product is a member of a product family which is nutritionally similar to a lead product which contains a combination of ingredients

that has been fed to a normal animal as the sole source of nourishment in accordance with the testing procedures established by AAFCO for all life stages, provided that:

- A. The nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by AAFCO; and
 - B. The family product meets the criteria for all life stages; and
 - C. Under circumstances of reasonable doubt, the (State Control Official) may require the manufacturer to perform additional testing of the family product in order to substantiate the claim of nutritional adequacy.
- (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:
- (1) The claim is qualified with a statement of the limited purpose or specific life stage for which the product is intended or suitable, for example, “complete and balanced for puppies (or kittens).” The claim and the required qualification shall be juxtaposed on the same label panel and in the same size, style and color print; and
 - (2) The product meets at least one of the following:
 - A. The nutrient requirements for the limited purpose or specific life stage established by an AAFCO-recognized nutrient profile; or
 - B. The criteria for a limited purpose or a specific life stage as substantiated by completion of the appropriate AAFCO-recognized animal feeding protocol(s):
 - i. Qualified claims of nutritional adequacy that include large size dogs can be substantiated by completing the appropriate protocols using large size dogs; or
 - ii. Can be substantiated by completing the appropriate protocols using dogs less than 70 lbs. adult weight while containing no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles; or
 - C. The requirements of a product family which is nutritionally similar to a lead product which contains a combination of ingredients which, when fed for such limited purpose, will satisfy the nutrient requirements for such limited purpose and has had its capabilities in this regard demonstrated by adequate testing, and provided that:
 - i. The nutritional similarity of the family product can be substantiated according to the Procedures for Establishing Pet Food Product Families developed by

- AAFCO; and
 - ii. The family product meets the criteria for such limited purpose; and
 - iii. Under circumstances of reasonable doubt, the (State Control Official) may require the manufacturer to perform additional testing for the family product to substantiate the claim of nutritional adequacy.
- (c) Dog and cat food labels shall include a statement of nutritional adequacy or purpose of the product except when the dog or cat food is clearly and

Language for Insertion into the Feeding Protocols (in red)

AAFCO Dog and Cat Food Nutrient Profiles— Introduction

The Pet Food committee recommends that the revisions to the AAFCO Dog and Cat Food Nutrient Profiles not be enforced until 12 months (1/1/2017) for new products in development and 24 months (1/1/2018) for existing products after publication of the revised AAFCO Dog and Cat Food Nutrient Profiles in the print version of the AAFCO OP.

[...]

The established profiles are the “AAFCO Dog Food Nutrient Profiles” and “AAFCO Cat Food Nutrient Profiles” as the terms are applied in AAFCO model pet food regulations referring to nutritional adequacy. Under these model regulations, dog and cat foods substantiated for nutritional adequacy by reference to the AAFCO Dog and Cat Food Nutrient Profiles for a designated life stage(s) must be formulated to contain at least the minimum concentrations of nutrients specified in the Profiles, and, for some nutrients, not more than any maximum concentration listed for that specific nutrient in the Profiles as shown in this section. Products with their nutritional adequacy substantiated by AAFCO Feeding Protocols are not mandated to meet the minimum or maximum concentrations listed in the Profiles, except for large-size dogs growth and all life stage products substantiated by the protocols using non-large size dogs must contain no more than the maximum large size breed calcium and phosphorus concentrations listed in the profiles. Additionally, snacks, treats or products intended for intermittent or supplemental feeding only are not mandated to meet the concentrations in the Profiles unless their labeling references the Profiles.

[...]

**MINIMUM FEEDING PROTOCOL
FOR PROVING AN UNQUALIFIED REPRESENTATION
OF NUTRITIONAL ADEQUACY
FOR A DOG OR CAT FOOD**

The minimum testing necessary to prove an unqualified claim for nutritional adequacy may be obtained by using the gestation/lactation and the growth protocols.

[...]

Test puppies or kittens shall receive the test diet as their sole source of nourishment, other than dam's or queen's milk, during lactation, weaning, and growth.

Selection of puppies or kittens shall be on a statistically sound basis from each of the litters qualifying for the gestation/lactation protocol with equal sex distribution preferred.

Unqualified claims of nutritional adequacy for a product to be fed to large size dogs can be substantiated by completing the gestation/lactation and the growth protocols using large size dogs or can be substantiated by completing the gestation/lactation and the growth protocols with dogs less than 70 lbs. adult weight in which the product contains no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles.

[...]

**MINIMUM FEEDING PROTOCOL FOR PROVING A GROWTH
CLAIM FOR A DOG FOOD**

PUPPIES

A minimum of eight puppies from three different bitches shall be required to start the test.

[...]

The test group shall have the same gender distribution as the concurrent control group.

A growth claim of nutritional adequacy for a product that includes

large size dogs can be substantiated by completing the growth protocol using large size dogs or can be substantiated by completing the growth protocol using dogs less than 70 lbs. adult weight in which the product contains no more calcium and phosphorus than the maximum limits for large size dogs listed in the AAFCO Dog Food Nutrient Profiles.

[...]