



FINAL: 10/07/2021

Committee Report/Minutes
2021 AAFCO Annual Meeting
August 2, 2021 1:45 – 3:15 PM, Virtual Meeting

Committee Recommendations

Committee recommendation summary or list.

- (1)
- (2)

Board Recommendations

Board recommendation summary or list.

- (1)
- (2)

Association Actions

Association action summary or list.

- (1)
- (2)

Committee Participants

Members Present:

Liz Beckman (WA – Co-chair), Stan Cook (MO – Co-chair), Chris Berg (IA), William Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM), George Ferguson (NC), Kristen Hamilton (ID), Madison Fink (MO), Kristen Green (KY), Tiffany Leschishin (MN), JoLynn Otero (NM), Caitlin Price (NC), Katie Simpson (IN), Austin Therrell (SC), James Embry (TX).

Advisors Present:

Bill Bookout (NASC), Louise Calderwood (AFIA), Dave Dzanis (APPA), James Emerson (US Poultry and Egg), Dave Fairfield (NGFA), Ryan Frank AFIA, Jean Hofve (PWA), David Meeker (NARA), Chris Nash (PFAC), Angele Thompson (PFI), Pat Tovey (PFI), Tim Law (NARA).

Others Present:

Susan Hays (AAFCO Executive Director), Melissa Kunze (AAFCO Executive Assistant), Performedia personnel

Committee Report

Meeting called to order at 1:45 ET

Announcements

The meeting is being recorded, questions will be addressed after each agenda item, use the 'chat' button for comments/questions.

Welcome to new member Chris Berg (IA) and new advisor Chris Nash (PFAC). Welcome back Stan Cook as PFC Co-Chair.

Committee Activities

Committee Minutes

Human Grade Working Group – Caitlin Price, NC

Finalized guidelines in May and sent recommendations to PFC which passed by e-vote in late May. Guidelines are currently with MBRC to be voted on this week. If approved, PFC and MBRC will jointly send to the AAFCO BOD. The Guidelines and Feed Term for Human Grade will move together. If both



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pass, it is expected to be ready for membership vote at mid-year 2022. The audit should become available after the guidelines are approved.

Some chat comments regarding having human food facilities register also as a feed facility and conflict between Part 507 and part 117. The facility must be registered with FDA since commercial feed producing facilities must be inspected by an entity that inspects pet food as the end product. FDA does not approve products, only inspects facilities for compliance with the rules.

Post meeting update – at the MBRC meeting, a motion passed to remove the HG guidelines from the MBRC meeting agenda and to be sent back to PFC. The guidelines have been posted and are open for comments until 8/27/21. Caitlin Price has resigned from the NC Department of Ag; George Ferguson and Austin Therrell will be the work group leads. PFC is appreciative the work Caitlin has done on this work group.

PFLM Update – Liz Beckman, WA
Slides available.

PFLM Working groups draft model regulations are available on the [AAFCO/PFC](#) website (posted in July) and are available for public comment. PFLM WG hope to send recommendations to PFC in November, 2021. Next steps involve review by MBRC then membership vote. The website also has information to register for future PFLM Webinars to provide opportunity for comments and questions. The WG would like to receive comments/questions on a rolling basis over the 90-day comment period.

PFLM Implementation WG – Stan Cook, MO
Slides available.

State surveys regarding implementation are currently with the states for comments. The goal is to best understand each state's adoption process for new regulations in order to facilitate implementing the new PFLM regulations. It is very important to get a response from each state. Next step will be to analyze results of the survey. Group is developing models/best management practice for different types of state adoption methods in order to facilitate.

Some states will require an industry fiscal impact. Industry partners helped collaborate on categories/criteria for fiscal impact of pet food labeling changes. Implementation timing will be key: shorter 'rush' timing would result in increased costs.

Overall goal is to create a timeline for state adoption and post that to the public PFC website.

Copper WG – Dr. Bill Burkholder, FDA
Slides available.

February Viewpoint article published in the JAVMA indicated that the authors believed increased incidence of copper-associated hepatopathy in dogs was due to a change in the type of copper used in premixes. The authors suggested that AAFCO consider reinstating a maximum value and to lower the minimum 0.9 to maximum 1.1 mg/1000 kcal. The WG was formed to consider the matter. The WG is waiting on some long term feeding trials from industry. At present, it does not appear that the data supports such a drastic reduction and tightening of the range.

The authors were not asked to participate in the WG because they have already reached a conclusion which is presented in the article.

States are encouraged to supply lab results to the WG for additional consideration.



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Pet Food Forum/Pet Food Training Modules – Sue Hays, AAFCO/Katie Simpson, IL

2021 Pet Food Forum will be held September 22-24 in person. AAFCO will not have a booth this year, but Hollis Glenn and Sue will be attending.

AAFCO originally planned to hold a Pet Food Labeling Workshop at the Pet Food Forum, but due to COVID-19 AAFCO has switched gears to Pet Food Training Video Modules. These segments would be shorter. The group hopes to share more information at the mid-year meeting.

New Training and Outreach Sub-Committee - Liz Beckman, WA

Slides available.

A sub-committee is being formed with Chris Berg as chair to plan/develop/maintain training opportunities and current training and outreach materials, bringing in subject matter experts in the area of need; coordinate with ETC and provide recommendations to the PFC. This group will take over/merge with some existing workgroups.

Meeting concluded at 2:33 ET.



PET FOOD COMMITTEE

Annual Meeting,
2021

HOUSEKEEPING

- The meeting is being recorded.
- Questions and comments will be addressed after each agenda item and at the end of the meeting.
- To comment or ask a question there is a 'Chat' button on the video platform that is available for registered viewers.
- Caitlin Price will monitor the Chat and Kristin Green will take minutes for the meeting.

AGENDA

PFC Welcome and Updates

1:45-1:50

Work Group Reports:

Human Grade Guidelines Update – Caitlin Price

1:50 – 2:00

PFLM – Update – Liz

2:00 – 2:10

PFLM Implementation Work Group Update – Stan Cook

2:05 – 2:30

Copper Work Group Update – Dr. Bill Burkholder

2:30 – 2:40

Pet Food Forum/Pet Food Training Modules – Sue Hays/L. Beckman

2:40 – 2:50

New Training and Outreach Sub-Committee - Liz Beckman

2:50 – 3:05

- Due to on-going training activities a sub-committee is needed to plan and keep material and information updated.

AGENDA

PFC Welcome and Updates

Welcome New Additions to PFC

- Chris Berg – Iowa Department of Agriculture & Land Stewardship, Member
- Chris Nash – Pet Food Association of Canada (PFAC) – Advisor

Update

- Welcome Back Stan Cook as Co-Chair

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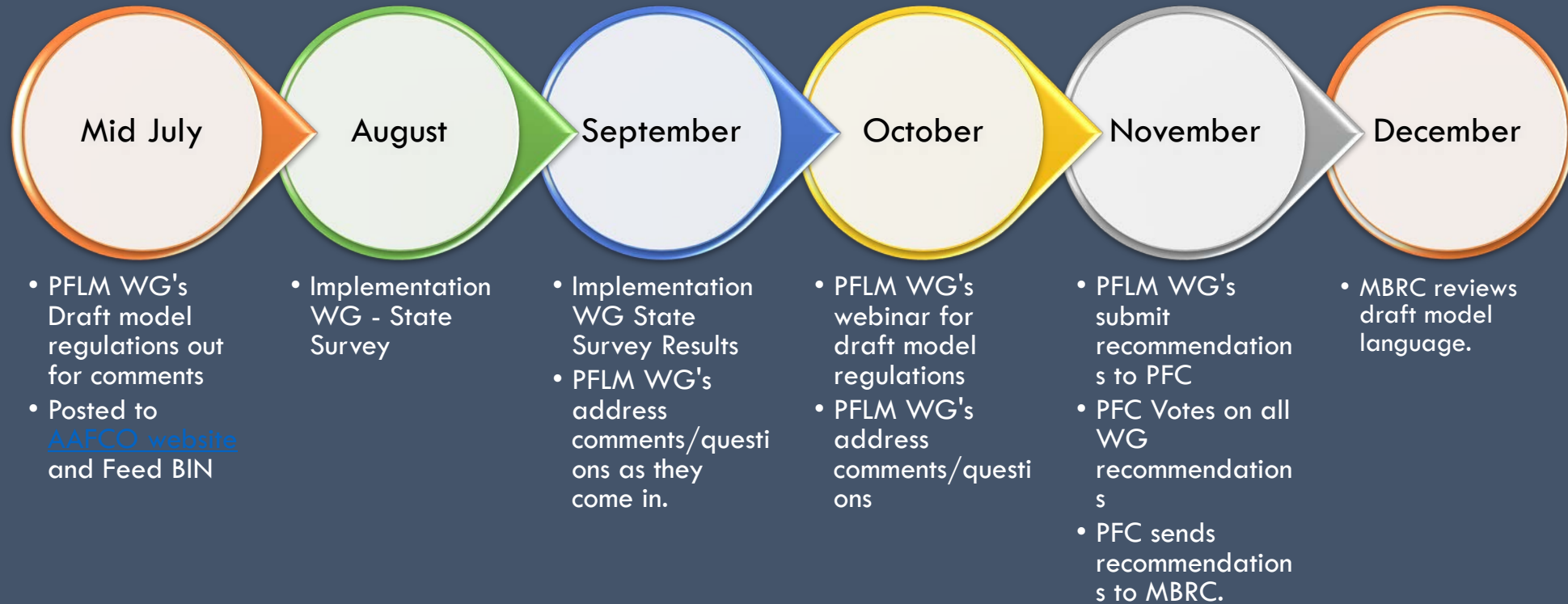
Human Grade Guidelines Update – Caitlin Price

1:50 – 2:00

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PET FOOD LABEL MODERNIZATION (PFLM ALL WORK GROUPS) APPROXIMATE TIMELINE FOR 2021



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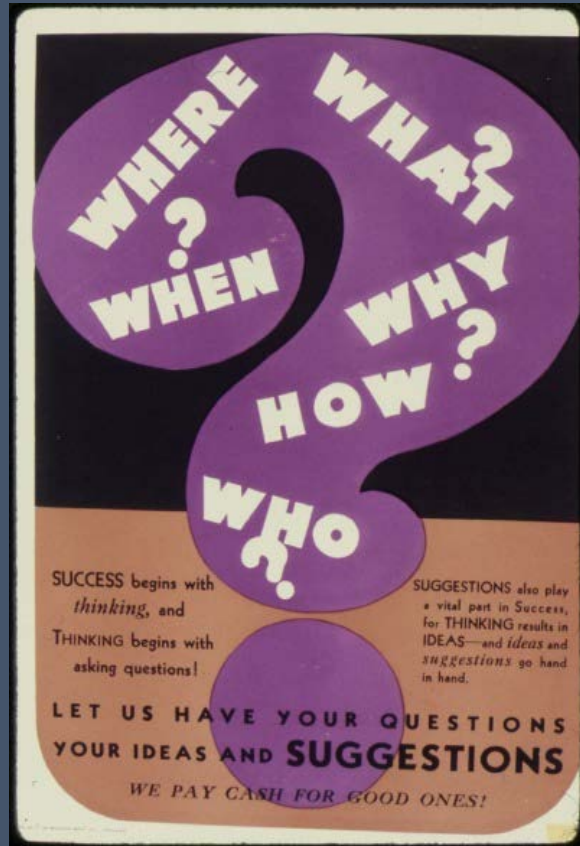
2:05 – 2:30

- State survey
- Industry Fiscal Considerations

PFLM IMPLEMENTATION WORK GROUP UPDATE

- State Survey
 - Provided document to states about history of PFLM, where we are now, and planning ahead.
 - Analyze survey group types of states by.
 - Develop models/best management practices for regulatory adoption for each type state.
 - Provide Industry and Regulatory Fiscal Impact information
 - Develop and provide education materials for industry, states, consumers.
 - Develop timeline of estimated state adoption of the regulations.

SURVEY: THE WHY, WHAT, WHEN, WHERE



* 1. What state do you work for?

* 2. Does your position or agency regulate pet food?

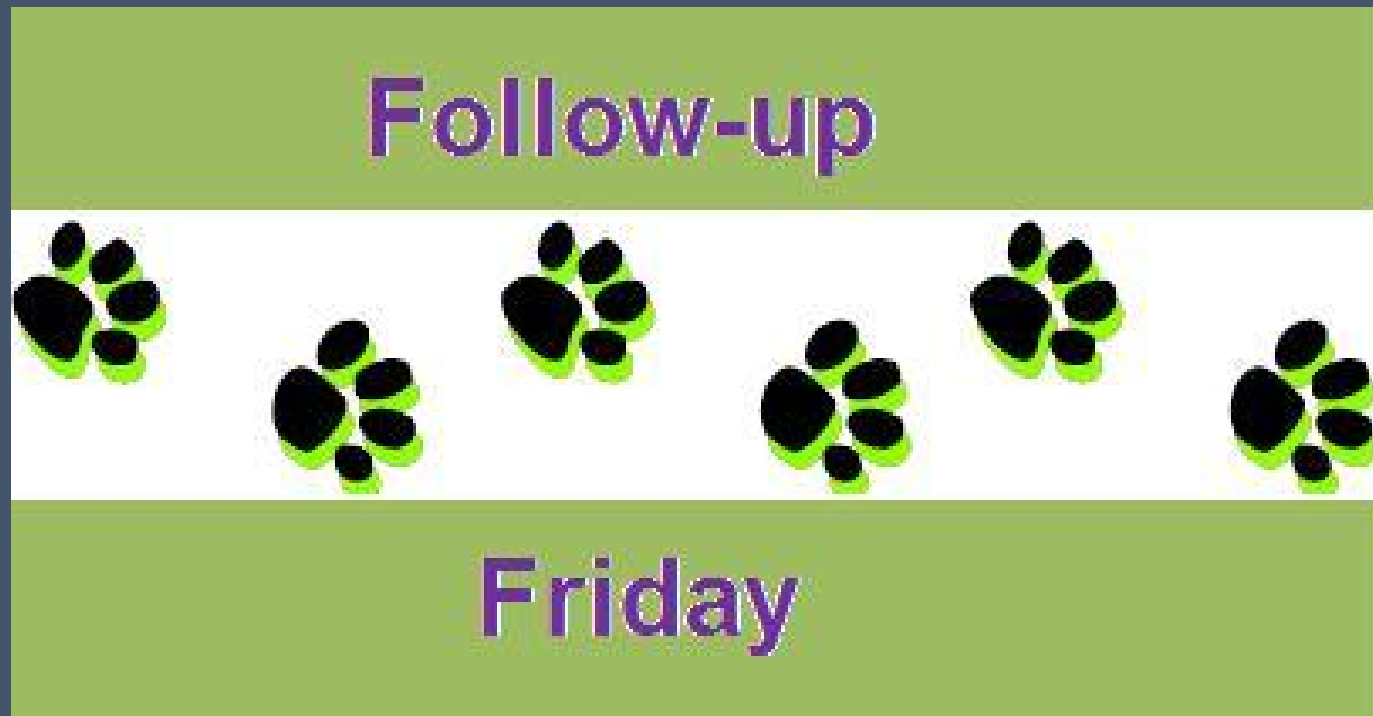
Yes

No

Prev

Next

FOLLOW UP SURVEYING



EVALUATE RESULTS OF SURVEY



DEVELOP MODELS/ BMPS



INDUSTRY FISCAL IMPACT



PFLM IMPLEMENTATION WG TIMELINE

- Goal will be to create a timeline for state adoption.
- The timeline will be posted to PFC website.
- Work is in progress, PFC will try to keep the process as transparent as we can.
- Questions?

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Copper Work Group Update – Dr. Bill Burkholder

2:30 – 2:40

COPPER WORK GROUP

Viewpoint

Is it time to reconsider current guidelines for copper content in commercial dog foods?

Sharon A. Center DVM

Keith P. Richter DVM

David C. Twedt DVM

Joseph J. Wakshlag DVM, PhD

Penny J. Watson VetMD

Cynthia R. L. Webster DVM

From the Department of Clinical Sciences, College of Veterinary Medicine, Cornell University, Ithaca, NY 14853 (Center, Wakshlag); Veterinary Specialty Hospital of San Diego, San Diego, CA 92121 (Richter); Department of Clinical Sciences, College of Veterinary Medicine and Biomedical Sciences, Colorado State University, Fort Collins, CO 80521 (Twedt); Department of Veterinary Medicine, University of Cambridge, Cambridge CB3 0ES, England (Watson); and Department of Clinical Sciences, Cummings School of Veterinary Medicine, Tufts University, North Grafton, MA 01536 (Webster).

Address correspondence to Dr. Center (sac6@cornell.edu).

Over the past 15 to 20 years, we have seen what we believe to be an increased incidence of copper-associated hepatopathy in dogs. The onset of this increase appears to have coincided with a change in the type of copper used in premixes added to commercial dog foods. And, more recently, the increased

allowable nutrient contents for foods formulated for dogs. These guidelines are developed from nutrient recommendations made by an NRC panel of experts on the basis of evidence-based scientific studies⁹ and are periodically revised by canine and feline nutrition expert subcommittees appointed by the AAFCO.

In 1997, the AAFCO recommendation regarding

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New Training and Outreach Sub-Committee - Liz Beckman 2:50 – 3:05

- Due to on-going training activities a sub-committee is needed to plan and keep material and information updated.

SUB-COMMITTEE CHARGE:

To plan/develop/maintain training opportunities and current training and outreach materials, bringing in subject matter experts in the area of need; coordinate with ETC and provide recommendations to the Pet Food Committee.

PFC Training & Outreach Sub-Committee

TRAINING:

- Basic PF Labeling Workshops
- Advanced PF Labeling Workshops
- Training Modules
- P/SPF Labeling Guide
- PFLM (state/industry)

OUTREACH

- Websites
 - AAFCO Talks
 - Business of PF
- PF Checklist
- Industry Meetings
- Trade Shows
- PFLM (state/industry)

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THANK YOU...



Viewpoint

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with AAFCO's minimum nutrient content recommendations; however, they may do so without taking into account native copper already in the baseline diet. Also, even if the copper content is referenced on a food label, the wide bioavailability of copper from natural ingredients complicates determining the true copper intake.

Summary of Evidence for Reconsidering Dietary Copper Recommendations for Dogs

Several lines of evidence support our recommendation to reexamine dietary copper recommenda-

evidence of copper insufficiency.

Fifth, the current AAFCO recommendation for minimum daily copper intake for maintenance adult canine diets of 1.83 mg/1,000 kcal is equivalent to a copper intake of approximately 0.067 mg/kg/d for a medium- or large-sized dog (the precise conversion is done on the basis of metabolic body weight). This represents approximately 1.7 to 1.8 times the copper intake associated with copper-restricted diets (0.9 to 1.1 mg/1,000 kcal, ranging from approx 0.04 to 0.07 mg/kg/d), which again, the authors have found to be safe for long-term feeding of healthy dogs and dogs with various hepatic diseases.

Sixth, widespread copper insufficiency was not

Conclusions

We understand that AAFCO recommendations are intended to broadly meet the needs of all dogs while allowing for the complex interactions that might influence bioavailability of certain ingredients and accounting for differences in energy needs and food intake. Nevertheless, we believe that the current recommendations for copper content in adult maintenance canine diets are too high and may exceed the upper tolerability limit for some dogs, resulting in hepatic disease. Therefore, we recommend that copper requirements for dogs be reconsidered and that the AAFCO consider establishing an upper tolerability limit. We believe that doing so would reduce the incidence of copper-associated hepatopathy in dogs and enhance canine welfare.

9. National Research Council. Minerals. In: Benz DC, ed. *Nutrient requirements of dogs and cats*. Washington, DC: National Academies Press, 2006;145-192.
10. Baker DH. Cupric oxide should not be used as a copper supplement for either animals or humans. *J Nutr* 1999;129:2278-2279.
11. Flinn FB, Inouye JM. Some physiological aspects of copper in the organism. *J Biol Chem* 1929;84:101-114.
12. Meyer AE, Eggret C. Iron and copper in liver and liver extracts. *J Biol Chem* 1932;99:265-270.
13. Beck AB. The copper content of the liver and blood of some vertebrates. *Aust J Zool* 1956;4:1-18.
14. Gumbrell RC. Suspected copper deficiency in a group of full sib Samoyed dogs. *N Z Vet J* 1972;20:238-240.
15. Keen CL, Lonnerdal B, Fisher GL. Age related variations in hepatic iron, copper, zinc and selenium concentrations in Beagles. *Am J Vet Res* 1981;42:1884-1887.
16. Thornburg LP, Shaw D, Dolan M, et al. Hereditary copper toxicosis in West Highland White Terriers. *Vet Pathol* 1986;23:148-154.
17. Zentek J, Meyer H. Investigations on copper deficiency in growing dogs. *J Nutr* 1991;121:S83-S84.

Charge to the Copper Content of Dog Foods Work Group:

Review available information regarding copper content in dog food to determine whether the copper concentrations in the AAFCO model regulations need to be changed.

Categories/Criteria for Fiscal Impact of PFLM*

- Design Rebranding/Refresh
 - New graphics, formatting and information (many panels including PDP)
- Artwork build & creation
 - AW/Creation Agency per sku fees
 - Color Plates
- Packaging Materials
 - Potential obsolescence
- Information Systems Updates/Enhancements/Replacements
 - Calculation of new Nutrition Facts information
 - Enhancements to packaging/labeling systems for new format, new inclusions
 - New reporting functionality
 - Websites/e-commerce accommodations
- Increased Laboratory Analyses (TDF)
 - Increased RM supplier nutrient requirements
 - Plant release specs/process
 - Internal testing of incoming RM from supplier & recurring for nutrient modeling
- Re-registration domestically & internationally
 - Double registration for some during discretion timing
 - Some unknowns regarding international adoption
- Advertising and/or Educating Consumers
 - Current vs “Coming Soon” or “New”
 - Stickers or inserts to current packs (as example)
 - Trainings, other educational avenues

***Implementation timing** will affect each of these. Shorter timing will require a “rush” which could include hiring contracted services, hiring personnel or increased fees with providers/printers for priority.