

## **PET FOOD COMMITTEE (PFC) REPORT AND MINUTES**

August 13, 2013

1:30 pm – 3:30 pm (Tarpon/Sawyer/Long)

St. Pete Beach, FL

### **COMMITTEE RECOMMENDATIONS:**

1. The PFC recommends that the issue regarding Contradictions between Revised AAFCO Model Regulations for Pet and Specialty Pet Food under the Model Bill (PF4, Expression of Guarantees) and State Regulations be sent to AAFCO's Current Issues and Outreach Committee. Refer to Action Item #2 for the discussion.
2. The Pet Food Committee recommends to the Board to accept the revised AAFCO Dog and Cat Food Nutrient Profiles and AAFCO Feeding Protocols that were submitted to the AAFCO Board initially on June 10, 2013 with the following changes to the AAFCO Dog and Food Nutrient Profiles: maximum calcium levels to be listed in a single column option with the maximum calcium value for growth and reproduction to be 1.8% and that for maintenance to be 2.5% with footnote 'e' reading: "The maximum of 1.8% is applicable to products formulated to meet the Growth and Reproduction Nutrient Profile and products formulated for All Life Stages. The maximum of 2.5% is applicable only to products formulated to meet the Adult Maintenance Nutrient Profile".

Refer to Action Item #3 for Discussion and Appendix Item A (Corrections to Maximum Calcium Levels for the Dog Food Nutrient Profiles), Appendix Item C (Proposed Revisions to AAFCO Dog and Cat Food Nutrient Profiles Final 081313), and Appendix Item D (Proposed Revisions to AAFCO Feeding Protocols submitted to AAFCO Board on 6/10/13).

NOTE: The Co-Chair of PFC withdrew the request to the AAFCO Board for membership consideration and adoption of the recommended changes to the AAFCO Dog and Cat Food Nutrient Profiles at the AAFCO 2013 Annual Meeting and returned the matter of changes to the AAFCO Dog and Cat Food Nutrient Profiles to the Pet Food Committee for further discussion. However, the PFC requested that the revised AAFCO Dog and Cat Food Feeding Protocols remain on the agenda for approval by the Board and a vote of the AAFCO membership at the AAFCO 2013 Annual Meeting. The AAFCO Board decided to withhold consideration by the general membership for the revised AAFCO Feeding Protocols until the issues with the Revised AAFCO Dog and Cat Food Nutrient Profiles were resolved.

**BOARD RECOMMENDATIONS:**

- 1.
- 2.

**ASSOCIATION ACTIONS:**

- 1.
- 2.

Committee Participants:

**Committee Members**

Liz Higgins (NM) Co-Chair  
Kristen Green (KY) Vice-Chair  
Dr. William Burkholder (FDA-CVM)  
Jenny Bibb (MS)  
Stan Cook (MO)  
Sam Davis (SC)

**Industry Advisors**

David Fairfield (NGFA)  
Dr. Jean Hofve (PWA)  
David Meeker (NRA)  
Dr. Jessica Meisinger (NRA)  
Angela Mills (NGFA)  
Susan Thixton (AFTP)  
Dr. Angele Thompson (PFI)  
Pat Tovey (PFI)  
Steve Traylor (AFIA)  
Leah Wilkinson (AFIA)

Committee members present by conference call were: Jan Jarman (MN) Co-Chair, Donna Dicesare (NY), Charlotte Conway (FDA-CVM), Johanna Phillips (ID)

Committee Advisors present by conference call were: Mollie Morrissette (AFTP)

10 Members, 11 Industry Advisors and 101 Guests including 11 State and Federal Control Officials and 90 Industry representatives were in attendance at the Pet Food Committee (PFC) meeting.

Committee Report:

**Committee Activities**

***1. Modifications to the Agenda***

**ACTION:**

The agenda was revised upon request from the AAFCO Board of Directors (BOD) due to a scheduling conflict with the Feed and Feed Ingredient Manufacturing Committee. In addition, the previous Agenda Item 7 (Discussion of unclear or ambiguous items in the Model Regulations) has been removed and may be discussed in January 2014. Please note

that discussion of Agenda Item 8 (Maximum calcium levels in the revised Dog Food Nutrient Profiles) will begin at 2:30 pm regardless of where we are in the agenda.

**MOTION:**

Sam Davis (SC) moved to accept the revised agenda. The motion was seconded by Jenny Bibb (MS). There was no discussion and the motion passed by voice vote.

**2. *Contradictions Between Revised AAFCO Model Regulations for Pet and Specialty Pet Food Under the Model Bill (PF4, Expression of Guarantees) and State Regulations – Johanna Phillips, ID Dept. of Agriculture***

**ACTION:**

Johanna Phillips (ID) noted that there are contradictions between the AAFCO Model Regulations for Pet and Specialty Pet Food under the Model Bill and State regulations, specifically between portions of the Regulation PF4 and state regulations in Idaho and Oregon. Other states may have this issue as well. For PF4 specifically, the AAFCO Official Publication (OP) indicates that the labeler should follow the units of the cat nutrient profiles for specialty pets (IU/kg), but Idaho regulations require that the guarantee be noted in units of IU/lb. Johanna stated that her goal was to open the dialogue, and suggested that AAFCO develop a method to advise states of potential changes to the Model Bill and Regulations so that state feed programs have a chance to comment on the proposed regulations or start modifying their regulations before the language is printed in the AAFCO Official Publication. Johanna suggested that maybe PFC was not the appropriate committee to work on this issue because the Model Bill and non-pet food Model Regulations may also conflict with state requirements. Jan Jarman (MN) stated that committees should consider the effect of any relevant documents or revisions when making recommendations. Donna Dicesare (NY) asked if Idaho could use enforcement discretion in deciding whether or not to enforce regulations where contradictions between AAFCO and state regulations exist. Johanna indicated that in Idaho they are expected to enforce the law and regulations as written, so enforcement discretion is generally not allowed.

**MOTION:**

Stan Cook (MO) moved to refer this issue to the Current Issues and Outreach Committee. The motion was seconded by Sam Davis (SC). There was no discussion and motion passed by voice vote.

**3. *Proposed Revisions to the AAFCO Dog and Cat Food Nutrient Profiles (Maximum calcium levels for dogs) - Dr. William Burkholder, FDA-CVM***

**ACTION:**

Dr. William Burkholder indicated that there was a discrepancy identified by Dr. Angele Thompson (PFI) between what was contained in the PFC minutes from the 2013 Albuquerque, NM meeting for the Revised Dog Food Nutrient Profiles as posted on the AAFCO website and the values in the AAFCO Dog Food Nutrient Profiles that were sent to

the Board of Directors (BOD) regarding maximum calcium content. During the 2013 PFC meeting in Albuquerque, several changes were made by the PFC to the Dog and Cat Food Nutrient Profiles, some of which affected calcium values in the Dog Food Nutrient Profiles. The Dog Food Nutrient Profiles forwarded to the BOD after the PFC meeting in Albuquerque indicated that the maximum calcium levels for all life stages of dogs (including maintenance only) was 1.8%, but the motion recorded in the Albuquerque PFC meeting minutes on the AAFCO website does not indicate the PFC made any changes to the maximum calcium values in the revised AAFCO Dog Food Nutrient Profiles. Dr. Burkholder indicated that he had edited the revised AAFCO Dog Food Nutrient Profiles to reflect what he understood the PFC had intended to do at the Albuquerque meeting, which included setting one value of 1.8% for the maximum calcium content in all dog food products formulated to meet the AAFCO Dog Food Nutrient Profiles, and had forwarded those revisions onto the PFC chair to provide to the BOD. Dr. Burkholder indicated that he had not noticed the discrepancy when reviewing the final PFC meeting minutes. He stated that at least one copy of draft meeting minutes contained a change in the motion for the maximum calcium value to be 1.8% for all dog foods formulated to meet the AAFCO Dog Food Nutrient Profiles, however, other draft copies of the minutes did not contain this change. This information was passed on to the chair of the PFC. The complexity of the motion and resulting discussion at the PFC meeting in Albuquerque likely contributed to the misunderstanding, thus, the Chair chose to pull back the PFC recommendation to the BOD that they consider the revised Dog Food Nutrient Profiles for a vote by the general membership in order to address this discrepancy.

The AAFCO Dog Food Nutrient Profiles were returned to the PFC for reconsidering the intended maximum calcium levels for the various life stages of dogs at this meeting. The revisions to the AAFCO Dog and Cat Food Feeding Protocols as previously passed by the PFC in Albuquerque were not affected by this issue and therefore were not discussed.

Two options were presented to the committee by email on August 5, 2013 (with the exception of inclusion of the word ‘only’ as noted below) and as presented on the screen to the attendees at the PFC meeting in St. Pete Beach, FL (See Appendix A – Option for One Maximum Column with Two Calcium Maximums and Footnotes and Appendix B – Option for Listing 2 Maximum Columns in the Dog Food Nutrient Profiles Table) that provided alternative options for allowing for the 2.5% calcium maximum value to remain for Adult Maintenance dogs, with the revised 1.8% calcium maximum applying to growth, reproduction and those products listed as for ‘all life stages’.

Option 2A (Appendix A) did not change the maximum value column format from the current AAFCO Dog Food Nutrient Profiles format and instead included the value ‘1.8(2.5)<sup>e</sup>’ and the footnote: ‘<sup>e</sup> The maximum of 1.8% is applicable to products formulated to meet the Growth and Reproduction Nutrient Profile and products formulated for All Life Stages. The maximum of 2.5% is applicable only to products formulated to meet the Adult Maintenance Nutrient Profile.’ A comment received from Dr. Dave Dzanis (APPA and ACVN) was to include the word ‘only’ in reference to the Adult Maintenance Profiles for clarity and was included in the amended version displayed on the screen at the meeting.

Option 2B (Appendix B) was presented which offered a different format that included the designation of maximum values in two columns; one for the 'Growth and Reproduction' Nutrient Profile and one for the 'Adult Maintenance' Nutrient Profile. In this option, the maximum calcium value for growth and reproduction was indicated to be 1.8% and that for maintenance was 2.5%. Included in this option was a footnote <sup>'b'</sup> which read: <sup>'b'</sup> Maximum values for Growth and Reproduction also apply to products labeled as being formulated to meet the AAFCO Nutrient Profiles for All Life Stages.'

Johanna Phillips expressed a preference for Option A and it was indicated that Dr. Dzanis had previously expressed a preference for Option A with the addition of 'only' to second sentence regarding the 2.5% being for maintenance in the footnote 'e'. Jan Jarman (MN) attempted to ask why the version of the Nutrient Profiles presented in Albuquerque was not being considered as an option but there were audio difficulties with the conference call.

Dr. Burkholder commented that the expert committee did recommend that the maximum calcium value be reduced to 1.8% for growth and reproduction of large breed dogs only. It was his understanding that the PFC did not want to limit the nutrient profiles to large breed dogs only based on regulatory efficiency. He also pointed out that the 2006 NRC *ad hoc* Committee on Dog and Cat Nutrition had set 1.8% calcium on a dry matter basis as the safe upper limit for all growing dogs regardless of breed.

Dr. Thompson thanked the PFC for reconsideration of this issue. She reminded the PFC that the Expert Committee for the revision of the nutrient profiles recommended 2 maximum calcium values for growth and reproduction: 1.8% for large breed dogs only and 2.5% for small and medium breed dogs. She mentioned that the footnotes provided by the expert committee included language that identified large breed dogs as those dogs weighing 70 lbs or more. Dr. Thompson suggested that the PFC go back to recommendations from expert committee.

Dr. Steve Traylor (AFIA) mentioned that the PFC could also consider the option of setting the maximum calcium level at 2.5% for all life stages.

Dr. Allen Bingham from Bil-Jac made a comment that he would like the committee to understand that this change will have far reaching effects on the regulated industry.

**MOTION:**

Kristen Green moved to accept the Nutrient Profiles Option 2A as amended on the screen to forward to the AAFCO Board of Directors for their consideration of a general membership vote. Kristen clarified for those individuals on the phone that she was referring to the single column option with footnote 'e' reading: "The maximum of 1.8% is applicable to products formulated to meet the Growth and Reproduction Nutrient Profile and products formulated for All Life Stages. The maximum of 2.5% is applicable only to products formulated to meet the Adult Maintenance Nutrient Profile".

The motion was seconded by Stan Cook (MO). Johanna requested confirmation, which was affirmatively given, that no other values were changed in the profiles. The motion passed by voice vote.

#### ***4. Adjourn Pet Food Committee***

##### **MOTION:**

Dr. Bill Burkholder (FDA-CVM) moved to adjourn the meeting. The motion was seconded by Kristen Green (KY). There was no discussion and the motion passed by voice vote. The meeting was adjourned at 3:22 pm.

#### **Committee Minutes:**

##### **Announcements**

Co-Chair Liz Higgins (NM) introduced new committee member Jenny Bibb from the Mississippi Department of Agriculture and Commerce; and new committee advisors Susan Thixton and Mollie Morrissette representing The Association for Truth in Pet Food (AFTP), and Dr. Jessica Meisinger representing The National Renderers Association (NRA).

Liz recognized Teresa Crenshaw previously of the Delaware Department of Agriculture on her retirement and dedication to the PFC since 1988. It was noted that Erin Bubb (PA) has resigned from the PFC based on her new role as an AAFCO investigator.

Liz thanked Connie White for her dedicated service to PFC for taking minutes. Connie recently retired after 43 years with the Virginia Department of Agriculture & Consumer Services and this will be her last meeting.

The PFC minutes from the mid-year meeting in Albuquerque in 2013 were previously accepted by e-vote by the committee on May 30, 2013.

##### **Request for assistance from Laboratory Methods and Services Committee Carbohydrate Working Group - Nancy Thiex**

Nancy Thiex made a request to industry and states for assistance with the development of laboratory methods for determining sugars in animal feeds. The methods for mono and disaccharides are moving along very slowly due to a lack of resources including laboratory equipment, expertise and funds, and will likely not be available for several years. Nancy introduced Jeff Horst from Agri-King, who serves on the Carbohydrate Working Group, and asked him to further explain. Jeff indicated that the working group is encountering significant inter-lab variation using current methodologies and equipment for the samples that have been tested so far. Without additional laboratory and financial assistance and expertise from industry and state laboratories, development of a method will take considerable time. If this is considered to be a critical issue for industries or other parties, additional assistance is necessary for timely completion of this project.

Angele Thompson (PFI) inquired about the types of samples tested, and Jeff responded that they included at a minimum a medicated swine feed, rabbit feed and senior dog food, and that he could provide a complete list upon request.

**Status of the CVM Draft Compliance Policy Guide for Labeling and Marketing of Nutritional Products Intended for Use to Diagnose, Cure, Mitigate, Treat, or Prevent Diseases in Dogs and Cats – Dr. William Burkholder, FDA-CVM**

Dr. Burkholder (FDA-CVM) indicated that there is nothing new to report on the status of this draft policy guide. Comments were received and will be considered. It is not expected that finalizing this draft document will take precedence over current FDA-CVM initiatives such as regulations mandated by FSMA and FDAAA.

**AAFCO Talks Pet Food – Richard Ten Eyck, OR Dept of Agriculture**

Richard Ten Eyck (OR) explained to the PFC that the Board of Directors (BOD) has developed a plan to prepare a general public resource website with information regarding pet food for consumers. Richard will send an executive summary of the project to Liz Higgins to be shared with the PFC. The BOD provided funds and PFC will have a chance to review and edit the information before it is made public. While the initiative was originally discussed as a revenue generator, the information is currently planned to be available at no cost.

**Reports from the AAFCO PFC Working Groups**

**A. Small Manufacturers Working Group/AAFCO Pet Food Website - Jenny Bibb, MS Dept. of Agriculture and Commerce**

Jenny Bibb (MS) extended thanks to Leah Wilkinson (AFIA) and Dr. Jean Hofve (PWA) for their assistance in reviewing the Business of Pet Food website for broken links and other needed corrections. A list of non-working links and incorrect information was passed on to the Federation of Animal Sciences Society (FASS) and the website has been corrected. If anyone finds errors or non-working links on the website or has suggestions for additional content for the site they should contact Jenny Bibb, email: [Jennyb@mdac.ms.gov](mailto:Jennyb@mdac.ms.gov).

**B. Carbohydrate Working Group – Jan Jarman, MN Dept. of Agriculture**

Jan Jarman (MN) said that the Carbohydrate Working Group has been considering issues involved in including carbohydrate information on labels such as guarantees and claims. In all cases, label statements must be truthful and verifiable. Jan referenced Section 5(a)(3) of the Model Bill which states that nutrient guarantees are required to support claims made in labeling. Substances or elements must be determinable by laboratory methods such as the methods published by AOAC International.

There are no recognized methods for determining total carbohydrates in animal feed. A method is currently being developed for dietary starch and should be ready for publication by AOAC by the end of the year. Methods for sugars in animal feeds, however, may not be available for several years. Jan said that the Working Group is

currently considering the use of the Nitrogen-Free Extract (NFE) calculation as an indicator for carbohydrate content. This would be an “other recognized method” that is already used in calculating calorie content, and would meet the requirement in the AAFCO Criteria for Labeling Nutritional Indicators that guarantees be verifiable and enforceable.

The Working Group is also considering whether or not voluntary guarantees for sugars, dietary starch or NFE provides a benefit to consumers.

**C. AAFCO Pet Food & Specialty Pet Food Labeling Guide and Label Review Checklist Working Group – Johanna Phillips, ID Dept. of Agriculture**

Johanna Phillips (ID) stated that the working group has been working on a revised Pet Food and Specialty Pet Food Labeling Guide to correspond to the changes made to the Model Pet Food Regulations since the mid-year meeting. The revised label review checklist should be completed in the next month or two for consideration by PFC prior to the mid-year 2014 meeting.

Liz Higgins mentioned that voting on the minutes from this meeting will be conducted by e-voting in the near future.

Agenda items for the mid-year meeting in New Orleans 2014 should be provided to Liz Higgins by December 1, 2013.

Action Item Table:

Responsible	Item	Action	Timing / Status
Johanna Phillips	Revised Label Review Checklist	Draft document available to full PFC	Ongoing/ draft prior to 2014 Midyear
Liz Higgins	Agenda for 2014 Midyear	Agenda items due to PFC Co-Chair	December 1, 2013
Liz Higgins/ Kristen Green	PFC Minutes Annual 2013	Final Minutes due to FASS 30 days after meeting	September 13, 2013
Liz Higgins/ Kristen Green	PFC Committee Report	Due to FASS	October 14, 2013



**Appendix**

Appendix Item A (Corrections to Maximum Calcium Levels for the Dog Food Nutrient Profiles)  
Single Column Option

Appendix Item B (Corrections to Maximum Calcium Levels for the Dog Food Nutrient Profiles)  
Dual Column Option

Appendix Item C (Proposed Revisions to AAFCO Dog and Cat Food Nutrient Profiles Final  
081313)

Appendix Item D (Proposed Revisions to AAFCO Feeding Protocols Profiles submitted to  
AAFCO Board 6/10/13)