



Final 2/12/2016

**PFC Committee Report/Minutes**  
AAFCO Annual Meeting  
January 19<sup>th</sup> 2016, 9:30am-12pm; Isle of Palms, SC

**Committee Recommendations**

Committee recommendation summary or list.

- (1)
- (2)

**Board Recommendations**

Board recommendation summary or list.

- (3)
- (4)

**Association Actions**

Association action summary or list.

- (1)
- (2)

**Committee Participants**

**Members present:** Stan Cook (MO), Kristen Green (KY), Charlotte Conway (FDA-CVM), William Burkholder (FDA-CVM), Austin Therrell (SC), Natasha Hedin (MN), Lizette Beckman (WA), Jo Lynn Otero (NM), Christie Shee (IN), Jason Schmidt (LA), Eric Nelson (FDA-CVM). Present via telephone: Jan Jarman (MN).

**Advisors present:** Dave Dzanis (APPA/ACVN), Jean Hofve (PWA), Susan Thixton (ATPF), Jessica Meisinger (NRA), Angele Thompson (PFI), Dave Fairfield (NGFA), Pat Tovey (PFI), David Meeker (NRA), Leah Wilkinson (AFIA), Jason Vickers (AFIA).

PFC attendance: 160 which includes 51 Control Officials.

**Committee Report**

**Committee Activities**

**ACTION:** Based on the availability of an AOAC sugars method in pet food, the carbohydrate workgroup will be reformed to consider revising the Carbohydrate Guidelines previously drafted by the workgroup for inclusion of the new method and other revisions deemed necessary.

**MOTION:** Bill Burkholder moved to reconvene the Carbohydrate workgroup.  
Seconded by Austin Therrell (SC). Motion Passed.

**ACTION:** The workgroup presented the result of the joint IDC/PFC work on human grade guidelines and human grade term.

**MOTION:** Stan Cook moved to accept the workgroup report, "Human Grade Guidelines".  
Seconded by Charlotte Conway (FDA-CVM). Motion passes.

**ACTION:** Based on substantial comments by the PFC and audience, additional edits may be necessary to appropriately revise the "Human Grade Guidelines".

**MOTION:** Bill Burkholder moved to send the workgroup report, "Human Grade Guidelines" back to the workgroup for additional editing.  
Seconded by Austin Therrell (SC). Motion passes.

**Committee Minutes**

**Announcements**



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New committee members were introduced: Christie Shee from the Office of the Indiana State Chemist, Jason Schmidt from the Louisiana Department of Agriculture, and Jo Lynn Otero from the New Mexico Department of Agriculture.

### **AAFCO Dog and Cat Food Nutrient Profiles Errors in 2016 Official Publication**

Stan Cook (MO) announced Dog and Cat Food Nutrient Profiles editorial changes are required to correct errors found in the printed Official Publication (OP) AAFCO Dog Food Nutrient Profiles table based on Dry Matter and the AAFCO Cat Food Nutrient Profiles based on Calorie Content. The corrections that have been identified are:

Incorrect Values Appear in the Table AAFCO Dog Food Nutrient Profiles Based on Dry Matter for Maximum Vitamin D, Maximum Vitamin E, Minimum Thiamine, and Minimum Riboflavin Concentrations. The correct values should be:

- Max Vitamin D IU/kg 3000
- Max Vitamin E IU/kg Blank – No Value Listed
- Min Thiamine mg/kg 2.25 for Both Growth and Reproduction and Adult Maintenance Profiles
- Min Riboflavin mg/kg 5.2 for Both Growth and Reproduction and Adult Maintenance Profiles

An incorrect value appears in the Table AAFCO Cat Food Nutrient Profiles Based on Calorie Content for minimum Arachidonic acid. The correct value should be:

- Min Arachidonic acid g/1000kcal ME 0.05 for Both Growth and Reproduction and Adult Maintenance Profiles

A workgroup was appointed which consists of Dr. Bill Burkholder, Charlotte Conway, Kelvin Hawkins, Angele Thompson to review the complete AAFCO Dog and Cat Food Nutrient profiles as published with errors in the 2016 OP to the correct version passed by the PFC in Denver 2015 which is the version that should appear in the OP. The charge of the workgroup is to identify all errors in the AAFCO Dog and Cat Food Nutrient Profiles tables and text and report those back to PFC by March 2016.

The PFC leadership will continue to notify AAFCO members and Feed Bin users via the Feed Bin of any errors in the AAFCO Dog and/or Cat Food Nutrient Profiles that are identified. Once the workgroup has identified all of the errors in the 2016 OP, corrected information will be provided to all purchasers of the 2016 physical OP. The online version of the 2016 AAFCO OP will be corrected as soon as possible.

### **Reminders and Timelines**

Kristen Green (KY) provided a reminder to the membership of the enforcement dates that PFC has recommended over the past couple of years regarding the revisions to PF9 (Calorie Content Statements) and the revised AAFCO Dog and Cat Food Nutrient Profiles with revised nutritional adequacy statements. PF9: Delayed enforcement until 18 months for new products in development and three years for existing products after publication in the AAFCO OP (published 2014).

- New products (those introduced after January 1, 2014) must currently meet the new requirements of PF9.
- Existing products must meet this requirement by January 1, 2017.

Revised AAFCO Dog and Cat Food Nutrient Profiles and Nutritional Adequacy statements (published 2016):

- 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 (2016).

- 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 (*Jan 1, 2016*) at which time the statement must be as verbatim in the revised PF7.

Members and audience members were reminded of the utility of the AAFCO Talks Pet Food and encouraged to continue to promote the site.

#### **AAFCO Pet Food & Specialty Pet Food Labeling Guide Workgroup – Charlotte Conway, FDA-CVM**

The revised Pet Food Labeling Guide has been voted through the PFC and is currently with FASS for formatting. The guide is still missing the ‘example labels’ that appeared in the previous Pet Food Labeling Guide. The Pet Food Labeling Workshop committee is charged with putting these label examples together and they will be added to the Pet Food Labeling Guide when available.

#### **Pet Food Labeling Workshop Workgroup – Kristen Green, KY Div Reg Svcs**

The workgroup has convened, and task specific subgroups have been created. A GAP analysis is being conducted on past slides to determine where additional slides are necessary. The entire workgroup will convene again by conference call in March to clarify next steps. The Pet Food Labeling Workshop is currently planned for 1.5 days at the 2017 annual AAFCO meeting in Bellevue, WA.

#### **Carbohydrate Workgroup – Jan Jarman, MN Dept. of Agriculture**

Jan Jarman (MN) reported that a new method for sugar detection in pet food has been electronically published by the JAOAC. Based on the availability of a suitable method, the Carbohydrate workgroup has reformed to consider revising the Carbohydrate Guidelines previously drafted by the workgroup for inclusion of the new method and other revisions deemed necessary.

Analytical Method for Sugar Profile in Pet Food and Animal Feeds by High Performance Anion Exchange Chromatography with Pulsed Amperometric Detection. Authors: Ellingson, David ; Anderson, Phillip; Berg, Daniel. Accessible: <http://aoac.publisher.ingentaconnect.com/content/aoac/jaoac/pre-prints/content-150258>

#### **Tartar Control Claims Workgroup – Austin Therrell, SC Dept. of Agriculture**

Austin Therrell (SC) is the new chairman of this workgroup. The workgroup has made progress since the annual 2015 meeting and anticipates having a draft for the PFC to consider at the 2016 annual meeting.

#### **Human/Feed Grade Workgroup – Stan Cook, MO Dept. of Agriculture**

The Human/Feed Grade workgroup, which is a joint effort between PFC and IDC members and advisors, has put together a proposed feed term for ‘human grade’ along with guidelines for “Human Grade” claims to be placed in Chapter 4 after the “Natural” Guidelines. PFC reviewed the human grade feed term, which is under consideration by the IDC, and no comments or modifications were provided.

The intent of the workgroup in proposing the term and guidelines was for the feed term (under control of IDC) and Guidelines (under control of PFC) to travel or fail together.

There was some concern by the audience and PFC members/advisors that the Guidelines as presented were not clear, in particular in (1). There were additional questions regarding ‘edible’ and ‘raw’ as applied to humans, whether ‘human grade’ could apply to a single ingredient in a mixed pet food. Generally



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agreed upon changes included '*current* good manufacturing practices (cGMP)' and '21 CFR *part* 117' [italicized portion indicates added language] as well as a change in (3) from "should" to "must".

Once the document has been edited and accepted by PFC, it will not need to go to the MBRC. The workgroup will work on revised language to present to the BOD before the summer 2016 meeting so that the Guidance can still travel with the feed term.

#### **Pet Food Label Modernization Discussion - Stan Cook, MO Dept. of Agriculture**

The BOD has given the PFC the following charge:

"Review and consider potential changes to modernize pet food labeling that enhances transparency and expands safety, taking into account the following:

- alignment with human food nutrition box formatting
- use of front-of-packaging nutrition cues
- consideration of microbial risks and safe handling instructions
- availability of new sugar and dietary starch methods
- use of modern fiber labeling
- ideas put forth in the public comments received on the FDAAA public meeting."

It is the intention of the PFC to form a workgroup to consider the above charge along with any other modernization factors that the workgroup deems important to consider. There were several comments from PFC members, advisors and the audience and some discussion items included:

- Importance of consistency
- Separate identity/nomenclature for pet food ingredients from feed ingredients
- Remove 'crude' from guarantees
- Lack of accuracy in provided values in the human nutrition facts box
- Consider modern technology (scan boxes, etc)
- Concern about FDAAA Pet Food labeling requirements coming out and not matching AAFCO guidelines.

Industry and associations agreed to provide input and data on consumer preferences.

Members and advisors may put in a request to be on the workgroup and the PFC leadership will appoint advisors/members to achieve a well-balanced and manageable workgroup. It is expected that this workgroup will have a long term charge. It is the intention that this workgroup provide input back to the PFC at the 2016 annual meeting.

#### **Administrative Issues - Kristen Green, KY Div Reg Svcs**

A few items were added to the action items table, and the completed table will appear in the official PFC meeting minutes.

New PFC policies regarding agenda submissions were outlined. All agenda submissions must follow the justification and formatting requirements found on page 91 of the 2016 AAFCO OP in Committee Guidelines. Items submitted in time for draft agenda consideration will be presented to the members of PFC for their consideration. Items presented after the draft agenda for a meeting has been prepared may be pushed for consideration at the following meeting. The PFC membership may or may not consult advisors regarding agenda item submissions.

Pet Food Committee Adjourned at 11:30 pm EST.

**Action Items Table**

<b>Responsible</b>	<b>Item</b>	<b>Action</b>	<b>Timing/Status</b>
Bill Burkholder	Revised Profiles Corrections Workgroup	Review the 2016 OP against the version that is known to be correct for any additional errors. Present to PFC appropriate distribution	By March 1, 2016
Stan C./Kristen G	AAFCO Dog and Cat Food Nutrient Profile Corrections outreach to OP users	(1) Post updates (as confirmed) on FeedBin (2) Letter to OP holders (with known issues. (3) Updated tables/other information (from result of WG) (4) Update online OP (5) Make sure print OPs still in stock are 'updated' (6) Other actions deemed necessary	As soon as possible, some information will come from the revised profiles workgroup.
Kristen G.	PF/SPF Labeling Guide Formatting	Send to FASS and facilitate formatting process	1.2016 – sent to FASS but still missing label examples.
Austin T.	Revised Tartar Control Workgroup	Workgroup to provide revised AAFCO Tartar Control Guidelines to the PFC for consideration	Update due 8.2016
Jan J.	Carbohydrate WG	WG reformed to consider new AOAC Sugars method and other revisions to the Carbohydrate Guidelines.	Update due 8.2016
Stan C.	Human Grade Guidelines	Guidelines returned to WG for editing/revisions	Update to PFC due April 2016 (after PFC goes to the BOD for consideration prior to 2016 annual meeting)
Stan C.	Human Grade Term	Make sure that Guidelines and Term are approved/not approved together at the 2016 annual meeting	Confirm status of Guidelines. Term goes to membership vote in August 2016.
Kristen G.	Pet Food Labeling Workshop Work Group	Continue subgroup activities, arrange for entire WG webex to further define future responsibilities.	Mar 2016
Stan C.	Pet Food Modernization Workgroup	Gather interest and assign PFC member and advisors to this workgroup.	February 15, 2016
Stan C.	Pet Food Modernization Workgroup	Consider and report back to PFC at 2016 annual meeting the WG recommendations.	Update due 8.2016
Lizette B.	AAFCO Talks Pet Food Revisions	Manage comments/revisions provided by the public/members for inclusion in the site	Ongoing, no immediate action required.
Charlotte C.	PF/SPF Labeling Guide revisions	Finalize Labeling guide, complete revisions and move to PFC vote	Complete – passed 12.2015. Needs formatting.
Kristen G./Liz H.	Pet Food Labeling Workshop AAFCO facilitation	Complete and submit workshop information to Education and Training Committee. Make necessary arrangements with FASS regarding general dates/times for reservation purposes.	Complete - Oct. 2015



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