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Pet Food Committee Minutes
AAFCO Annual Meeting
Bellevue, WA
August 11, 2017

Committee Recommendations

Committee recommendation summary or list.

- (1) None

Board Recommendations

Board recommendation summary or list.

- (2) None

Association Actions

Association action summary or list.

- (1) None

Committee Participants

Members Present: Kristen Green (Chair, KY), Stan Cook (Vice-Chair, MO), Liz Higgins (NM), Kristen Hamilton (ID), Lizette Beckman (WA), Jason Schmidt (LA), George Ferguson (NC), James Embry (TX), Tiffany Leschishin (MN), William Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM), Kathleen Close (FDA-ORA), Austin Therrell (SC). Present via phone: Nathan Price (ID)

Advisors Present: Leah Wilkinson (AFIA), Pam Kaufmann (AFIA), Dave Dzanis (APPA and ACVN), Susan Thixton (AFTP), David Fairfield (NGFA), David Meeker (NRA), Angele Thompson (PFI), Chris Cowell (PFI). Present via phone: Jean Hofve (PWA), Mollie Morrissette (PWA)

Committee Activities

Motion to disband the Pet and Specialty Pet Food Definition Working Group. Moved by Liz Higgins (NM) and seconded by Bill Burkholder (FDA-CVM). Motion Passed.

Motion to recommend a working group for reviewing whether the AAFCO Dog Food Feeding Protocols need updating to account for the changes to the AAFCO Dog Food Nutrient Profiles relevant to growth of large size dogs. Moved by Liz Higgins (NM) and seconded by Austin Therrell (SC). Motion Passed.

Motion to form a workgroup to review and update the Business of Pet Food website and AAFCO Talks Pet Food website. Moved by Stan Cook (MO) and seconded by Kristin Hamilton (ID). Motion Passed.

Committee Minutes

Announcements

Meeting called to order at 2:00 pm. Kristen Green (KY) welcomed new members to the committee: Kathleen Close (FDA-ORA), Suzanne Riddle (MO) and Tiffany Leschishin (MN). Christie Shee (formerly IN) has left the Office of the Indiana State Chemist to pursue other opportunities.

Working Group Reports:

Pet and Specialty Pet Food Labeling Workshop

The 1.5 day Pet Food and Specialty Pet Food Labeling Workshop is full and will be held at the end of the AAFCO annual meeting. Due to a high level of interest in the Workshop, another 1.5 day workshop is being planned to be held directly after the midyear meeting in Anaheim, CA. The workshop will be held



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starting at 1 pm on Wednesday January 24th, 2018. Attendance will again be limited based on hotel restrictions. The workshop will be formally announced and registration opened this fall.

Definitions of Pet and Specialty Pet Working Group

The Model Bill and Regulations committee passed a slightly modified version of the Pet and Specialty Pet and Pet Food definitions during their annual meeting. The workgroup was dissolved during the meeting.

AOAC Sugars method validation update

This method has been developed and published and is available for use as it continues through the formal AOAC process. The method is being validated to become an AOAC official method, a process that may be completed by March, 2018.

Discussion Items:

Dental Claims

The revised Guidelines for Dental Related Claims were passed by the general membership and are now final. They will appear in the 2018 AAFCO OP.

USDA – AMS Human Grade Process Verified Audit

Tabatha Milligan with Perdue Food LLC presented an option being explored as a way to substantiate human grade claims: development of USDA Agricultural Marketing Service (AMS) Process Verified Program (PVP). See Appendix A.

Companies could be certified in one of two ways:

- (1) Process Verified Programs - AMS would certify that a firm meets the requirements of CFR 117 checklist and also complies with QAD 1000, QAD 1001 requirements. PVP certification allows the company to utilize the Process Verified shield and terms on packaging/POS and approved facility website.
- (2) Quality System Assessment (QSA) AMS would certify QAD 1002 program for compliance with the audit checklist. Company would not be eligible to utilize AMS process verified shields or claims on package.

The next step involves getting feedback from states as to whether they would accept this process or one like it to verify human grade claims. No official AAFCO action needs to be taken at this time.

Updating AAFCO Feeding Protocols to account for growth of large size dogs

With the revisions made to the AAFCO Dog Food Nutrient Profiles, it was requested that PFC review the AAFCO Feeding Protocols to ensure the protocols provide appropriate substantiation [in particular for growth of large size dogs (70 lbs or more as an adult)]. For example – if a firm is going to make a claim for growth of large size dogs for a product based on a feeding trial, then a firm should use large size dogs in the feeding trial. Workgroup formed, consists of: William Burkholder (FDA-CVM), Angele Thompson (PFI), Dave Dzanis (APPA, ACVN), Cathy Alinovi (NGPFMA), Kristin Hamilton (ID), Austin Therrell (SC), Tiffany Leschishin (MN)

GAPFA request regarding maximum Vitamin A levels in growing dogs

PFC received a letter from the Global Alliance of Pet Food Associations (GAPFA) requesting the committee evaluate raising the maximum levels of Vitamin A in the Nutrient Profiles for growing and reproducing dogs. GAPFA has requested in the past that AAFCO consider harmonizing with the FEDIAF guidelines for nutrient requirements in pets. The committee voted to form a working group to start looking at the information provided by GAPFA regarding the maximum Vitamin A level. It should be noted that PFC does not intend to start a nutrient-by-nutrient review of inconsistencies between the FEDIAF and AAFCO nutrient profiles. Members of the working group were not set in the meeting; instead the Chair of



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PFC will determine the composition of this workgroup and communicate this information to PFC members.

Updating the Business of Pet Food and AAFCO Talks Pet Food websites

There was a brief discussion regarding the need to continually review and update these AAFCO websites to reflect changes in the Pet Food Model Bill and Regulations. PFC voted to form a workgroup to review and update these sites on an annual basis. Due to time constraints, members will be identified after the meeting.

Discussion of PF3e

There was not time in the agenda to address this item. The topic may be considered for another meeting.

Pet Food Label Modernization Discussion – Stan Cook, MO Dept. of Agriculture

The label modernization project is a major focus for PFC and the work will increase over the coming year. Subgroups of this workgroup have been meeting and making progress. The four subgroups presented on progress and accomplishments made within each group.

Nutritional Adequacy/Feeding Directions – Jo Lynn Otero, NM Dept of Ag presented by Angele Thompson (PFI)

This group thought a front of package symbol might provide quick access for simple nutritional adequacy information for consumers. Various iterations of symbols were evaluated that would provide the needed information in a clear manner. This symbol is not intended to replace the nutritional adequacy statement but will be on the front panel of the product label. The group displayed different symbols for complete and balanced (circle) and supplemental feeding (rectangle). Placement on the principal display panel (PDP) was also discussed – top, bottom, right or left. The consensus on placement was that the lower right quadrant of the PDP would be most visible to the consumer. The group has also considered the size of the symbol relative to the area of the PDP for both the circle and the rectangle. The symbols would be available to companies on the AAFCO website for download so the symbols would be uniform across the industry. The group would like to see these symbols, their placement and their size included in the consumer survey.

Feeding Directions: Goal is to provide education to help consumers make better feeding choices. The group discussed creation of an AAFCO URL and/or website to give additional information to consumers on how to better interpret feeding directions. The group discussed that feeding directions are only guidelines. There are other factors to consider such as Body Condition Score as a way of determining pet's nutritional status, and that the fact that treats create an additional source of calories which need to be accounted for in a pet's overall diet.

The group discussed and reached consensus to not mandate more detailed feeding directions on products intended for growing animals. Consensus has not been reached on other aspects of the Feeding Directions and the group is still open to comments from stakeholders.

Work on regulation revisions has started, most of which are in PF7. There have not yet been proposed changes to PF8 – Feeding Directions.

The group thanked Jim Barritt with Mars for his generous help in generating multiple rounds of graphics.

Safe Handling and Storage Statement - Lizette Beckman (WA)

This group has considered statements to address safe handling and storage, possible cross contamination situations and safe handling by type of product like raw, dry, chews and cans.



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The group is still considering a couple of questions. Should a safe handling statement be required on all package sizes? Should safe handling statements be required on all types of products and is there sufficient evidence of risk to support that? The group has requested that the FDA address questions regarding safety risk associated with various types of products.

Pet Nutrition Facts Box - Jason Schmidt, LA Dept of Ag

This group has changed the title of the box from “Nutrition Facts” to “Pet Nutrition Facts” to differentiate from human foods. The group has discussed and included information to address: nutrient density, intended use, calorie statement, calories by nutrient type, and nutrients guaranteed per cup.

The group has also been discussing which nutrients should be guaranteed. Crude fiber is considered an outdated guarantee, and the consensus of the team is that total dietary fiber would be a more relevant guarantee for fiber. The group has had calls and discussed the need for additional calls with subject matter experts Dr. George Fahey and Dr Leslie Hancock.

This group has had several meetings and gone through 35 iterations of the Pet Nutrition Facts box and would like to thank to Jim Barritt of Mars Pet Food for the work on the graphics.

Ingredients - Richard Ten Eyck, OR Dept of Ag

The big picture ideas that the group has been working on include:

- Clarifying the ingredient list for consumers
- Pulling regulatory language from Human Food CFR's
- Codifying normal allowances for label review
- “Villain” ingredient names

Devilish Details:

- 2% grouping for ingredients of less than 2% in formula
- Vitamin and mineral naming (discuss common name solutions)
- Ingredients shall be listed and identified by the common name - still needs to be run by the workgroup
- Order of predominance of ingredients
- ‘May contain’ approach as used in human foods
- Common and usual ingredient names defined

Comments were made that there is not consensus in this work group and that previously regulators, FDA and industry have made comments that have not been addressed or acknowledged publically by the group.

There was discussion regarding the importance of providing relevant information on the labels for consumers that is communicated in a clear, transparent and useful manner. Do we need more ingredients to talk about the source of the meat ingredients? David Meeker (NRA) suggested that additional ingredient definitions could be created in the animal protein products section to distinguish “premium” or “pet food grade” ingredients from the existing definitions. There was discussion regarding use of the word “pet feed” rather than “pet food” for products that don't meet the human



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grade definition. FDA indicated that the agency has been moving away from the term “feed” and toward “food” for all animal food.

Comment received from the floor regarding the inclusion of percentages in the ingredient statement to provide additional information to consumers.

Next steps for the all groups include:

- Reach consensus of the concepts
- Survey to ensure that label communication to consumers is clear
- Convert concepts to regulatory language
- Pet Food Committee approval
- Model Bill & Regulations Committee approval
- General Membership vote

Moved to adjourn by Stan Cook (MO) seconded by Liz Higgins (NM)

Pet Food Committee adjourned at 5:10 pm

APPENDIX A: Presentation by Tabatha Milligan of Perdue Foods, LLC



Human Grade Verification Program

- ▶ AMS would audit industry programs based on the CFR 117 standards checklist to certify that pet food producers making Human Grade claims on pet products are in compliance with 117 and are using only human edible ingredients.
- ▶ Companies could be certified in one of two ways;
 - ▶ **Process Verified Program** – AMS would certify that a firm meets the requirements of CFR 117 checklist and also complies with QAD 1000, QAD 1001 requirements. PVP certification allows the company to utilize the Process Verified shield and terms on packaging/POS and approved locations are listed on the AMS PVP approved facility website.
 - ▶ **Quality System Assessment (QSA)** - AMS would certify QAD 1002 Program for compliance with the audit checklist. Company would not be eligible to utilize AMS process verified shields or claims on packages