



Committee Report/Minutes

2023 AAFCO Mid-year Meeting

Jan 18, 2023 10:00 – 12:00 PM

Committee Action Items:

- (1) PFC requests the CIOC group to develop an AAFCO response to JVMA regarding the Feb 15th article on copper levels in dog foods using the letter provided by the Expert Panel chairperson.

Board Recommendations

Association Actions

Committee Participants

Members Present:

Liz Beckman (WA – Chair), Stan Cook (MO – Co-chair), William Burkholder (FDA-CVM), Charlotte Conway (FDA-CVM), George Ferguson (NC), Justin Hill (NC), Kristen Green (KY), Holly Jewell (SC), Tiffany Leschishin (MN), JoLynn Otero (NM), Katie Simpson (IN), James Embry (TX), Barbara-Jean Schleicher (KS), Kristen Hamilton (ID), Angie Simons (GA), Bailey Whiten (GA)

Advisors Present:

Bill Bookout (NASC), Louise Calderwood (AFIA), Dave Dzanis (APPA), James Emerson (US Poultry and Egg), Julia Fidenzio (APPA), Matt Frederking (NGFA), Pam Kaufmann (AFIA), Chris Nash (PFAC), Angele Thompson (PFI), Pat Tovey (PFI), Charles Barkley (NARA), Cathy Alinovi (NGPFMA).

Committee Report

Meeting called to order at 10:00 AM CST

Announcements

PFC wishes to acknowledge and appreciate Bill Bookout, Dave Dzanis, Stan Cook and William Burkholder for their longstanding outstanding contributions to the PFC.

Committee Activities

Committee Minutes

Human Grade Working Group Update – Holly Jewell, SC

The new standard for human grade pet food was approved by the AAFCO Board of Directors. USDA-AMS will audit the new standard under its USDA Process Verified Program (PVP). Manufacturers of pet food and specialty pet foods intending to use a voluntary human grade claim should adhere to the processing, packaging and labeling expectations as stated in the standard and now have the additional option to participate in the USDA AMS PVP. Firms using the PVP are then approved to market themselves as “USDA Process Verified” and include the USDA PVP shield on packaging, labeling, and promotional materials.

Copper Workgroup – Dr. William Burkholder, FDA-CVM

At the Annual meeting, PFC accepted the Copper Expert Panel Report. In March of 2021, AAFCO convened this expert panel to discuss the findings of the February 21, 2021 article in the Journal of the American Veterinary Medicine (JAVMA) by Dr. Sharon Center *et al.* titled ‘Is it time to reconsider current guidelines for copper content in commercial dog foods?’ The article explores the idea that Copper



Associated Hepatitis (CAH) is caused by the content and supplemental sources of copper used in dog foods.

While the expert panel and AAFCO find the increase in copper content in canine liver to be well documented, insufficient data exist to establish a safe upper limit or maximum tolerance for copper in dog food. The lack of data that existed when the 2006 *Nutrient Requirements of Dogs and Cats* was published is still the case today, and AAFCO is loath to set an arbitrary level that may or may not protect against CAH.

The authors of the article requested that AAFCO consider the following actions. 1: Set the minimum requirement for CU in diets for dogs to 0.9 mg Cu/1000 kcal ME and a maximum level of 1.1 mg Cu/1000 kcal ME; and 2: Prohibit all supplemental sources of copper other than copper oxide in dog foods. The Expert Panel recommended against taking these actions. Additional information and rationale can be found in the Copper Workgroup Report (APPENDIX A).

The Expert Panel did suggest that PFC consider the possibility of setting a voluntary low copper claim standard in the Model Regulations PF10 Descriptive Terms. The Expert Panel suggested setting a level of 15 ppm Cu (DM basis) for dog foods that meet the AAFCO Nutritional Adequacy Profiles for complete and balanced dog foods only. Dog foods that do not meet the minimum copper levels in the Profiles would not be able to make a low copper claim and would instead be required to be formulated and distributed as a therapeutic diet.

Discussion by the PFC and advisors included need to have input from nutritionists and industry to determine if the level suggested is valid and workable. There is considerable interest by consumers in having this voluntary claim information available, and there is concern that this information could be bogged down in PFC in lengthy discussions similar to the calorie content issue several years ago. There was also discussion regarding whether this type of claim would be addressing a disease condition or be a preventative type of diet.

Kristen Green moved to not pursue a restriction for allowing only copper oxide as the form of copper allowed for copper supplementation of dogs. Jo Lynn Otero seconds. Motion carries.

Kristen Green moved to not establish a maximum for the overall copper content of dog foods within the AAFCO Dog Food Nutrient Profiles. George Ferguson seconds. Motion carries.

Kristen Green moved to consider and further explore establishing within Model Regulation PF10 Descriptive Terms the criteria for commercial dog food products to bear a 'Low Copper' claim, as provided for in the language of this report. George Ferguson seconds. MOTION AND SECOND WITHDRAWN. PFC members are directed to take time to consider the 'low copper' claim language provided by the Expert Panel for PF10 Descriptive terms prior to the annual meeting in August.

George Ferguson moved that the PFC request the CIOC group to develop an AAFCO response to JAVMA using the letter provided by the Expert Panel Chairperson. Kristen Green seconds. Motion carries.

George Ferguson moved that the PFC disband the Copper Expert Panel. Charlotte Conway seconds. Motion carries



Nutritional Adequacy Quantitative survey – Pam Kaufmann gave a presentation on the results of the quantitative survey conducted in September to clarify intended purpose (complete/incomplete foods) on the front of packages. Survey results showed that calling out the intended purpose requirements as proposed in the draft model regulations was well understood and considered to be important by consumers.

The Draft Model Regulations for the PFLM is now completed and agreed upon by the workgroup, The work includes Guidance documents for the Facts Box. The last comment period did not yield significant revisions that would require another comment period before the PFC consideration.

The PFLM Workgroup recommends that the PFC accept the work group report which includes: draft of changes in language to the PF Model Regulations and delete and replace the current PF regulations starting on page 139 through 151 of the 2023 AAFCO OP (hardcopy); and The Facts Box Example and Key guidance document which should be placed immediately after PF12.

Charlotte Conway moved to accept the Pet Food Labeling Modernization workgroup report (See APPENDIX B). Jo Lynn seconds. Motion carries.

Next Steps:

1. Report will go to FASS first for editorial changes
2. Once report is returned to PFC, PFC will meet to discuss
3. PFC plans to conduct an e-vote in February to move the language to Model Bill for their consideration.
4. Two 50 state calls are planned (Feb 22 and March 9th) to discuss the changes based on PFLM for state programs and to get state programs on board with making the changes uniformly.
5. Groups are working to develop educational materials. There is currently a one-page flyer outlining the main changes, history and impacts of PFLM out for comment until Jan 20th, 2023.
6. The Pet and Specialty Pet Food Labeling Guide is currently with FASS for editorial changes. This work does not include PFLM, but the work to update to the current Model Bill and Regulations is nearly complete.
7. Training workshops plans are not finalized, but consideration is underway for an AAFCO Pet Food Labeling workshop January 2024 as well as Pet Food Forum 2024.

Volunteers for the Training and Outreach Workgroup are requested.

Meeting concluded at 12:00 CT.