



FINAL: 02/28/24

## Committee Report/Minutes

2024 AAFCO Annual Meeting  
Jan 24, 2024 1:15 – 3:15 PM

### Committee Recommendations

Committee recommendation summary or list.

Committee recommends to the Board of Directors to be released of the charge to review CFR 501.105 as it relates to pet treats as well as AAFCO's Model Bill PF2 to determine if the language is still consistent. PF2 points to Model Regulation 3(a)8 which is in alignment with the CFR 501.105. Model Regulation (3(a)8(III) states: When the declaration of quantity of contents by count does not give adequate information as to the quantity of feed in the container it shall be combined with such statement of weight, liquid measure, or size of the individual units as will provide such information. In the instances where the product is sold is clear (ex. Clear plastic wrap showing the relative size of the chew) the consumer does know what it is receiving.

### Board Recommendations

Board recommendation summary or list.

(1)

### Association Actions

Association action summary or list.

(1)

### Committee Participants

#### Members Present:

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

#### Advisors Present:

Kathy Alinovi (NGPFMA), Bill Bookout (APPA), Louise Calderwood (AFIA), Dave Dzanis (ACVN), Dave Fairfield (NGFA), James Emerson (US Poultry and Egg), Jennifer Gornert (NASC), Jean Hofve (Pet Welfare Alliance), Pam Kaufmann (AFIA), Chris Nash (PFAC), Renee Streeter (ACVN), Angele Thompson (PFI), Pat Tovey (PFI), Charles Starke (NARA).

### Committee Report

Meeting called to order at 1:15 AM CST

### Committee Activities

#### Committee Minutes

##### Human Grade Working Group Update – Holly Jewell

The human grade workgroup considered questions that they received and are consolidating those into a FAQ. The intention is to make this FAQ publicly available on the website to provide some guidance to industry in navigating the human grade process. Questions regarding human grade claims should be sent to PFC@aafco.org.

Board of Director Charges – Stan Cook / Liz Beckman

**CHARGE A:** PFC to review CFR 501.105 as it pertains to pet treats as well as AAFCO's Model Bill and Regulations PF2 to determine if our position is still consistent with the language in the regulation.

The BOD issued this charge to consider whether the AAFCO Model Bills are consistent with the federal "count" allowance in 501.105. This issue has arisen because there are effectively multiple agencies with authority over the net weight statement. The Fair Packaging and Labeling Act directs the Federal Trade Commission and the FDA to issue regulations requiring that all "consumer commodities" be labeled to disclose net contents of a product. The Office of Weights and Measures of the National Institute of Standards and Technology (NIST) is authorized to promote to the greatest practicable extent uniformity in state and federal regulation of the labeling of consumer commodities. NIST has concluded that the regulations do not allow for "count" to suffice in the Net weight statement of certain pet products such as pig ears which vary naturally in weight.

There are now certain regions where action is being taken based on the NIST interpretation on products such as pig ears packaged with a "count" instead of a net weight statement. AAFCO has tried in the past to engage with NIST on this issue in to promote uniform interpretation, but no progress was made.

With regard to the BOD charge, a review shows that PF2 points to Model Regulation 3(a)8 which is in alignment with the CFR 501.105. ACTION ITEM: PFC should send a note to the BOD with the references and ask to be released from the charge. Included in the note should be a comment that the consumer does know what it is receiving if the packaging in which the product is sold is clear (ex. Clear plastic wrap showing the relative size of the chew).

**CHARGE B:** PFC to establish a new expert panel to review relevant research related to Ca/P in cats to determine if any revisions need to be made to the AAFCO Cat Food Nutrient Profile. FEEDIAF has changed their recommendations regarding Ca/P levels in cat foods, and the Japanese Pet Food Authority sent a letter to AAFCO inquiring about AAFCO's position on the matter.

Pet Food Committee discussed putting together an expert panel to review the data with Dr. William Burkholder participating. Industry urged the committee to follow the by-laws for expert panels.

Kristen Green moved to set up an expert panel to review Ca/P research in cats. Holly Jewell seconded the motion. MOTION CARRIED.

**CHARGE C:** PFC to explore establishing a routine review of the AAFCO Nutrient Profiles. In the past, expert panels have been convened when NRC has updated their nutrient requirements (usually 10-20 years between reviews). Several comments from members of PFC revolved around making sure that that PFC makes feasible choices given our volunteers and resources. NRC has the resources to do somewhat routine reviews, AAFCO does not. FEDIAF does review every 2 years, AAFCO should at least stay up to date with those changes. Reviews of the profiles should be based on newly available data. With two profiles (dogs and cats) and 100s of nutrients, constantly reviewing would be a big ask.

Kristen Green moved to set up a workgroup with Charlotte Conway as the Chair to offer insight into the feasibility of the charge. George Ferguson second the motion. MOTION CARRIED.

PFLM Implementation – Jennifer Roland

The PFLM Implementation workgroup has been on hold for the last couple of months as the volunteer members were overstretched with other activities. There will a PFLM discussion at the NASDA meeting in



FINAL: 02/28/24

February, and Jennier Roland will report back to AAFCO. There will be an implementation survey at the 2024 Annual AAFCO meeting during the PFC meeting. AAFCO is encouraging states to make progress on PFLM implementation.

#### Training & Outreach Subcommittee

The PFLM Get Smart training took place before the midyear 2024 meeting as an industry and regulator collaboration with 160 in attendance. There will be a PFLM event at the Pet Food Forum and there will be a Pet Food Labeling workshop at the 2025 Annual meeting.

Regulator/Industry workgroup – Katie Simpson is the lead and indicated that they are close to having materials to PFC for review.

Veterinary/Consumer workgroup – Tiffany Leschishin indicated that 2 video scripts (a general PFLM and a Pet Nutrition Facts box focused video) have already been sent to PFC for approval.

Visit [aafco.org/PFLM](https://www.aafco.org/PFLM) for publicly available PFLM resources. This is an evolving site and new materials will be uploaded when available.

#### Copper Claim Workgroup – Karen Donnelly

The Copper Claim Workgroup completed their report, and the report has been available on the BIN for some time. The Copper Claim WorkGroup did vote by a slim majority to support the recommendation of the workgroup. The PFC will have a meeting in March/April to decide what to do with the information and recommendation to include any additional copper language in the Pet Food Model Regulations.

There is a public landing page (<https://www.aafco.org/about/committees/pet-food/> - Library of Resources – Copper) where the documents and comments relating to the Copper workgroups reports are available. Any additional comments must be received by March 1<sup>st</sup> and should be sent to [PFC@aafco.org](mailto:PFC@aafco.org).

Karen Donnelly moved to accept the Copper Workgroup's report. Kristen Green seconded. MOTION CARRIES.

#### PFC Member/Advisor Commitment – Stan Cook and Liz Beckman

The work groups working on the PFLM content has been very busy creating content and PFC thanks those volunteers for all their work. While there has been a lot of work done, there is still more work that remains to be done and PFC needs members and advisor participation! Some of the projects coming up include edits to the Start up pet food site, AAFCO Talks Pet Food site for consumers, and the PF Labeling Workshop content needs to be updated to include PFLM.

The updated Pet Food and Specialty Pet Food Labeling Guide should be available in Feb/March.

Please contact [PFC@aafco.org](mailto:PFC@aafco.org) if you are interested in participating in any of these projects.

The meeting concluded at 2:30.