

**ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS (AAFCO)
1800 SOUTH OAK STREET, SUITE 100
CHAMPAIGN, ILLINOIS**

**MINUTES OF THE PET FOOD COMMITTEE (PFC) MEETING
HELD AT THE HYATT REGENCY SAN ANTONIO RIVERWALK
REGENCY BALLROOM
123 LOSOYA STREET, SAN ANTONIO, TEXAS
AUGUST 8, 2024, 1:15 P.M. CT**

COMMITTEE RECOMMENDATIONS:

Pet Food Committee to recommend to the Board the Human Grade FAQ (Appendix A) to post to the web for approval.

MEMBERS:

Kelsi Brown
Charlotte Conway
Karen Donnelly
James Embry
Rachel Kohne
Tiffany Leschishin

Jo Lynn Otero
Barbara-Jean Schleicher
Katie Simpson
Bailey Whiten

Holly Jewell
(via teleconference)
Liz Beckman
(via teleconference)
Stan Cook
Kristen Green

ADVISORS:

Cathy Alinovi
David Fairfield
(via teleconference)
Dave Dzanis
(via teleconference)

Matt Frederking
(via teleconference)
Pam Kaufman
Chris Nash
Charles Starkey

Renee Streeter
(via teleconference)
Angele Thompson
Pat Tovey
Jennifer Gornnert
Bill Bookout

GUESTS:

Sandra Tudge

Recording Secretary, Minutes Solutions (via teleconference)

1. CALL TO ORDER

There being a quorum present, and adequate and proper notice of the meeting having been given, the meeting was called to order at 1:16 p.m.

2. WELCOME AND ANNOUNCEMENTS

Stan Cook commended the Committee's progress over the past year and noted that the meeting would be his last as Committee Chair. Liz Beckman will continue on as co-chair and Holly Jewell will step in to replace Stan Cook. He also noted a change to the agenda with the presentation on the comments from industry at the end of the meeting.

3. COPPER WORK GROUP UPDATE

Karen Donnelly provided an update on the Copper Claim Work Group, noting that the Committee accepted the work group's report, and the group was subsequently disbanded. She reported that the Committee held a virtual meeting at the end of May 2024, and the vote on controlled copper regulation did not pass; this was mainly due the absence of a clear

scientific basis on which to make clear regulatory decisions. She recognized that some AAFCO members were disappointed, but unless there is new data to shed more light on copper in dog food, the matter before the Committee is closed.

Dave Dzanis asked about the issue of information presented in the public comments, specifically a paper published regarding copper and the lack of effect on liver disease that was retracted. He suggested that the work group needs to re-examine copper label claims to evaluate the impact of the retracted paper on the votes of the Pet Food Committee and the work group.

Cathy Alinovi noted that the Next Generation Pet Food Manufacturers Association agreed with Dave Dzanis' suggestion and noted that the veterinary industry and consumers want a claim.

Karen Donnelly advised that she could not speak for members of the Committee who voted but based on the information in the report and in the comments, the article in question was never mentioned as a rationale for voting against the regulation. She added that given the comprehensive examination of the issue, she did not believe that the one article played a large enough role to revisit the issue before the Committee.

An open forum participant expressed agreement with Dave Dzanis. She noted that a leading expert in liver disease in dogs who could provide academic science was refused participation on the work group. She noted that the work group needs equal scientific experts outside of industry.

4. HUMAN GRADE WORK GROUP UPDATE

On a motion made by Holly Jewell, seconded by George Ferguson it was resolved to accept the Frequently Asked Questions (FAQs) Regarding the Human Grade Pet and Specialty Pet Food Claim document, and to place it in on the AAFCO website. Motion carried. See Appendix A.

Holly Jewell reported that the work group meets monthly with the charge to address questions on human grade claims. The work group completed an FAQ document regarding the human grade pet food claim for the Pet Food Committee to recommend to the Board for approval. George Ferguson noted that if approved by the Board, the FAQ should be available on the AAFCO website by October 2024.

Holly Jewell noted that the workgroup will continue to meet monthly and is currently working on a training document for the USDA AMS PVP program to assist their auditors. She emphasized that the purpose of the work group is not to revise the regulations. Holly Jewell invited anyone from industry or regulatory with questions regarding the human grade claim to e-mail them to her, and the questions will be addressed.

5. CALCIUM/PHOSPHOROUS (CA/P) REVIEW IN THE CAT FOOD NUTRIENT PROFILES

William Burkholder of the FDA reported that at the mid-year 2024 meeting in Chattanooga, he was asked to convene an expert panel to examine recent scientific literature on Ca/P and to determine if updates are needed to the AAFCO Cat Food Nutrient profiles. William Burkholder reviewed the credentials of the expert panel members and reported that they have met twice over the past four months. The expert panel has reviewed the articles appended to the work group update and is considering setting a minimum Ca/P ratio for cat food and a maximum amount of P in cat food; however, these are still under discussion. The panel plans to meet one to two more times for discussion, with the intention to develop a recommendation document by the 2025 midterm meeting.

The Expert Panel (the Panel) has been formed and is composed of Dr. Dave Dzanis, Dr. Dottie Laflamme, Dr. Jennifer Larsen, Dr. Johnathan Stockman, Dr. Rebecca Remillard, Dr. Renee Streeter and Dr. William Burkholder (Chair). Each of the members have nutritional expertise in nutrient requirements and diet formulations to meet those requirements in pets (dogs and cats). In addition, Drs. Laflamme, Larsen and Stockman have done research and published scientific articles on the specific topic of phosphorus ingredients and renal physiology in cats and the phosphorus content of dog and cat foods. Drs. Dzanis, Remillard and Burkholder have experience creating, updating and setting the recommended nutrient amounts in the AAFCO Dog and Cat Food Nutrient Profiles. Dr. Streeter has extensive experience formulating diets and can advise on the consequences of nutrient changes and ingredient restrictions that the Panel may consider.

The Chair thanked William Burkholder and the expert panel members for their work.

Appendix C: Literature Considered

6. **AAFCO NUTRIENT PROFILES WORK GROUP**

Charlotte Conway provided an update on the AAFCO Nutrient Profiles Work Group formed January 2024, to explore the feasibility of a routine re-review of nutrient profiles. The work group has met twice with the goal of having a report with recommendations by the 2025 mid-year meeting. Work group members: Charlotte Conway (lead), Bill Burkholder, Dave Dzanis (Past Chairs Canine and Feline Nutrition Expert Subcommittees), Cathy Alinovi (NGPFMA), Tiffany Bierer (AFIA), Leslie Hancock (PFI)

We focused first on documenting the history of why and how the AAFCO dog and cat food nutrient profiles were established and subsequently revised. We also documented how FEDIAF updates its profiles. After our initial discussions, we've outlined challenges with establishing a routine re-review cycle for the nutrient profiles in totality. In part because the last two cycles of the AAFCO nutrient profiles were driven by a recent NRC publication. Instead, we intend to develop a recommendation for standardizing a set of criteria for PFC to determine if sufficient evidence has been submitted to warrant convening of an expert panel to consider a specific or particular change to the nutrient profiles. We think this will help ensure that AAFCO can be appropriately responsive to compelling science in pet food nutrition without overly burdening its technical expert volunteers.

FISH LABELING

Charlotte Conway provided an update regarding the labeling of fish on behalf of Marine Products Investigator Justin Hill. Following the publication of the updated model regulations, there have been more frequent questions about how to label fish on pet food. She reminded the group that the updated models point to FDA's Seafood List, a guidance for industry developed primarily for human food, to help companies know the appropriate common or usual name for a particular type of fish. She also noted that the Ingredient Definitions Committee is considering the establishment of definitions for fish, shellfish, and alligator driven by Pet Food Label Modernization (PFLM).

7. **PFLM – IMPLEMENTATION UPDATE**

7.1 **State Survey**

Jennifer Roland of the National Association of State Departments of Agriculture (NASDA) reported on the annual review of the states' PFLM implementation. There were 43 states that responded to the survey, of which at least two have implemented PFLM, 21 plan to complete implementation in the next two years, four states between 2027 and 2028, six states between 2028 and 2030, and ten were unsure of an implementation date. It was noted that 12 states have started the adoption process and all the six states that have observed some new PFLM labels are using enforcement discretion. States asked for continued guidance and updates regarding their strategies, support in training and education, and assistance with a public impact study.

The Committee agreed that the state survey responses could be made available and will be appended to the minutes. See Appendix B.

7.2 Industry Feedback

A motion was made by Charlotte Conway, to stand up a work group to explore the concerns relative to intended use statement versus purpose statement in the pet food model. Motion carried.

ACTION – The Committee Chairs will establish a work group to explore the concerns relative to intended use statement versus the purpose statement.

Louise Calderwood reported that various trade associations met several weeks prior to the meeting date to discuss PFLM implementation. She reviewed the support provided by the associations to members for the transition to PFLM, such as webinars, newsletter announcements, interactive sessions at conferences, ongoing education, and participation in AAFCO PFLM Committee activities. Industry expressed appreciation with AAFCO on working together on the changes and AAFCO's letter recommending six years for discretionary state enforcement.

Bill Bookout National Animal Supplement Council reviewed the concerns raised by industry as follows:

- Assurance that all states will adopt PFLM
- Variation in timing of adoption by states
- Availability of dietary fiber testing
- Access to previous pet food regulations for guidance during transition
- Impact of *PURR Act*, if passed
- Labeling of mechanical/abrasive dental products
- Intended use statement may conflict with federal and state statutes.

The Committee considered how to address industry concerns, noting that some of these concerns should resolve over time. It was confirmed that individuals who have online access to the AAFCO Original Publication have access to all previous versions. Pat Tovey noted that the *PURR Act* may address industry concerns.

Bill Bookout presented on the conflict in the terms "intended use" in the PFLM Guidelines and "intended purpose," and recommended replacing "intended use" in the new PFLM guidelines with a product purpose statement.

The Committee agreed to connect with industry regarding the outlined concerns in January, 2025, if needed.

Louise Calderwood noted that the work group's findings and available industry-produced resources are being consolidated and have been posted on the AAFCO website. It was also

noted that NASC has created guidance documents which have been posted on NASC's website for members and regulators.

Katie Simpson noted that she is leading a work group on a PFLM regulators toolkit that could be provided to regulators to distribute to facilities.

8. PFC TRAINING AND OUTREACH SUBCOMMITTEE

Holly Jewell stated that the Subcommittee meets monthly and is working on a five-year plan with the Committee for continued training and outreach. The Subcommittee work groups are working to develop content for PFLM.

Holly Jewell provided an update of the activities of the Subcommittee for the first half of 2024 and the training plans for 2025 to 2030. She then reviewed the outreach plans developed by the Subcommittee. She noted that the 2024 pet food labeling guide is now available, and training modules for small manufacturers, a shelf talker for retailers, and PFLM general information and PFLM nutrition facts box videos will be available soon.

Holly Jewell reported that she will be stepping down as the Chair of the Subcommittee and will be co-chairing the PFC. Tiffany Leschishin will be the new Chair for the Training and Outreach Subcommittee, and Kelsi Brown and Alisha Christian will co-lead the Veterinary/Consumer Work Group. Holly Jewell requested that individuals advise Tiffany Leschishin if they are interested in participating on the Subcommittee or at an outreach event.

8.1 Regulatory/Industry Outreach Work Group

Katie Simpson stated that she has been leading this work group for the last year to develop a toolkit on PFLM to assist regulators and industry through the changes. Once the toolkit is approved by the PFC, an announcement will be made regarding their placement.

8.2 Consumer/Veterinarian/Retailer (CVR) Work Group

Tiffany Leschishin noted that over the last year she has led the CVR Work Group and reported that the group has developed draft scripts for videos that provide an overview of PFLM for consumers, veterinarians, and retailers. The work group will also be ensuring that AAFCO's website has updated PFLM consumer, veterinarian, and retail-focused material. The work group finalized the PFLM shelf talker, which will be available for downloading and displaying.

8.3 Trainings/Workshops – Five-Year Plan

Tiffany Leschishin reviewed the PFLM five-year training plan, including a training event at the Pet Food Forum and a two-day pet food labeling workshop at AAFCO's 2025 and 2030 meetings, and smaller workshops on specific topics for 2026 to 2029.

9. OTHER TOPICS FOR DISCUSSION/NEW BUSINESS

Stan Cook expressed his appreciation for his many years working with AAFCO and as the PFC Chair.

10. ADJOURNMENT

It was agreed that there was no further business to transact; the meeting closed at 2:58 p.m.

DISCLAIMER

The above minutes should be used as a summary of the motions passed and issues discussed at the meeting. This document shall not be considered a verbatim copy of every word spoken at the meeting.

Director

Director

Date

Date



Human Grade Pet & Specialty Pet Food Claim Frequently Asked Questions

This document is designed to answer questions regarding the Human Grade Claim for Pet and Specialty Pet Food. The Human Grade term (listed below) is defined in the AAFCO Official Publication. The Human Grade guidelines, guidance document and appendices are available at www.aaftco.org.

Terms related to the claim:

- **Food and Drug Administration:** The federal regulatory body composed of multiple departments responsible for protecting public health. In relation to this document, the FDA is responsible for oversight and inspection of human and animal food production facilities.
 - **Food and Drug Administration Regulations regarding Animal Food Production** - [21 CFR 507](#)
 - **Food and Drug Administration Regulations regarding Human Food Production** - [21 CFR 117](#)
- **Human Grade:** In the AAFCO defined feed term “human grade”, the use of the term “human grade” is only acceptable in reference to the product as a whole. The feed term specifies that every ingredient and the resulting product must be stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR part 117 and all other applicable federal human food law as required by ingredient, process and/or facility type. <https://www.aaftco.org/resources/official-publication/op-chapter-6-public-access/>
- **Nutritional Supplement:** A feed used in conjunction with another feed to improve the nutritive balance or performance of the total feed and intended to be:
 - Fed undiluted as an addition to other feeds (most common for pets)
 - Offered freely to the animal with other parts of the ration separately available.
 - Further diluted to produce a complete feed.
- **Pet Food:** Food for dogs and cats



Human Grade Pet & Specialty Pet Food Claim Frequently Asked Questions

- **Specialty Pet Food:** Food for any animal normally maintained in a household, such as, but not limited to, rodents, ornamental birds, ornamental fish, reptiles and amphibians, ferrets, hedgehogs, marsupials, and rabbits not raised for food or fur.
- **USDA:** The United States Department of Agriculture (USDA) is comprised of multiple departments, just like other regulatory agencies. The USDA is responsible for human food safety.
- **USDA AMS:** The USDA Agricultural Marketing Service (AMS) administers programs that create domestic and international marketing opportunities for US producers of food, fiber, and specialty crops.
- **USDA AMS PVP:** The USDA Agricultural Marketing Service (AMS) Process Verified Program is a fee based voluntary verification service that offers applicants a unique way to market their products, including a verified Human Grade claim.
- **USDA AMS PVP Auditor:** A federal employee with the USDA Agricultural Marketing Service who performs the AMS Process Verified Program (PVP) audits. This auditor, although employed by the USDA is different than a USDA FSIS Inspector in that they are looking at Human Grade pet food standard requirements and not food safety requirements.
- **USDA FSIS Inspector:** Food Inspectors ensure that the product is fit for human consumption in compliance with federal laws governing the wholesomeness and purity of meat, poultry, and egg products.

1. What type of animal food can be marketed as Human Grade?

The Human Grade marketing claim is limited to Pet and Specialty Pet Food.

2. How does a firm make the Human Grade marketing claim on a Pet or Specialty Pet Food?

AAFCO recommends a firm undergo a voluntary audit through the [USDA AMS PVP Program](#). AAFCO encourages each state to accept the PVP certificate for validation.

3. What if a firm wants to make the Human Grade claim without going through the USDA AMS Process Verified Program?

A firm must contact each individual state for submission requirements. Acceptable documentation examples are outlined in the AAFCO Human Grade Guidance



Human Grade Pet & Specialty Pet Food Claim Frequently Asked Questions

Document. Please note that some states may no longer accept direct submissions and require manufacturers products be certified under the AMS Human Grade Pet Food PVP prior to being distributed within their state.

4. Can a 3rd party certify pet or specialty pet food as Human Grade?

USDA's Agricultural Marketing Service is the only 3rd party business/service, authorized by AAFCO and accepted by its member states, to certify pet and/or specialty pet products as meeting AAFCO's requirements for the Human Grade Pet Food Claim.

AAFCO has been made aware of private businesses and websites claiming to be authorized resources for certifying human grade claims in pet food and recommends manufacturers contact the feed control officials within the states you intend to distribute to discuss the appropriate course of action for that state.

5. How does a firm utilize the USDA AMS PVP Program?

More information on obtaining certification through the USDA AMS PVP can be found [here](#).

6. What is an estimated time frame and is there a cost associated with it?

Each firm's process may vary. Much of the process is dependent upon the firm's preparedness. PVP associated fees are available [here](#), listed under 'meat and poultry'.

7. How do you apply to the USDA AMS PVP Program?

The application and all required information is available through the [USDA AMS website](#).

8. Who do I contact if I have a question for the USDA AMS PVP Program?

Contact the AMS Livestock and Poultry PVP Program at qad.auditservice@usda.gov

9. If a firm chooses to go through the AMS PVP process, will we receive documentation of completion after the audit, and will this be accepted by each state?

The firm will receive a PVP certificate from the USDA AMS PVP Program and will be added to the [USDA PVP Official Listing](#) which verifies that the firm has completed the audit and meets the standard.

AAFCO encourages each state to accept the PVP certificate for validation. All other required labeling parameters must still be met.



Human Grade Pet & Specialty Pet Food Claim Frequently Asked Questions

10. If a firm is under USDA jurisdiction, can they also register as an FDA facility?

Yes, a firm can be both. The best way to think about facility registration and jurisdiction is to first look at it from the process/product level, and not from the firm/facility level. Regardless of the processes or products you make, house, or distribute under your roof, if there is a registration requirement by a state, local or federal entity, then you must register. In short, facilities are not under jurisdiction, products/processes are.

11. USDA FSIS inspectors already inspect my facility. Will they also inspect the manufacture of pet food?

Pet Food is regulated by the FDA and not the USDA FSIS. A USDA FSIS inspection focuses on human food safety. The USDA AMS PVP Program provides for a separate audit that addresses the Human Grade Pet Food Standard scope only in firms under USDA FSIS jurisdiction. The USDA AMS PVP program provides a qualified AMS auditor to review the records and procedures associated with the Human Grade Pet Food claim.

12. How long is a human grade claim good for?

The AMS PVP Program has an annual audit frequency; thus, the Human Grade Claim is good for one year. For those working on verification on a state-by-state basis frequency of verification may vary. Additionally, it is important to remember that each state may still require label/product registration.

13. Can I make a Human Grade Claim on an animal nutritional supplement?

Animal food supplements are held to the same requirements as any other animal food that is making the Human Grade claim. Firms should be registered and compliant under the requirements under 21 CFR 507 and 117.

14. What about some of the “unique pet and specialty pet foods”?

Some specific things that may be unique to the pet industry such as treats, toppers, mixers, freeze dried products, raw pet food, broths, dehydrated products, fish skins, etc would all still be subject to CFR 21 117 and must meet the guidelines to make the Human Grade Claim. It all comes down to the Ready to Eat (RTE) definition and compliance with the human food regulations in CFR 21 117. The same guidelines would apply regardless of the delivery form and intended use as animal food product.



Human Grade Pet & Specialty Pet Food Claim Frequently Asked Questions

15. Where do vitamin and minerals (chelated and synthetic) fit in?

Both chelated and synthetic vitamins and minerals are accepted in a Human Grade product if they are approved sources listed in the AAFCO Official Publication and are human food grade.

16. When the product leaves the factory door can it be co-mingled with other pet food or non-human grade food items?

Once a product is in its final package and is shipped in accordance with all of the [Human Grade Pet Food Guidelines](#), it maintains the [Human Grade Standard](#). Prior to final packaging the regulation does not allow for co-mingling of the human grade ingredients or food items.

17. If a firm is verified as a foreign firm through the foreign supplier verification program (FSVP) does this constitute an acceptable inspection, or do they have to manufacture in the US or US territory?

Currently the standard is established to facilitate the marketing of domestic Pet and Specialty Pet Food to a Human Grade Standard.

18. As a small manufacturer making a human grade pet food if my firm has been inspected and licensed as a human food facility by a local state health authority and not by the FDA am I still able to make the Human Grade Claim?

The inspection must be conducted by the FDA or any agency authorized to inspect by the FDA to the 21 CFR 117 regulations. While some states may have special exemptions under state rule, a firm must meet the Human Grade standard under 21 CFR 117 to make the claim.

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(3) TITLE	(4) EMAIL	(5) HAS YOUR STATE BEGUN THE ADOPTION PROCESS OF THE NEW PET FOOD LABEL MODERNIZATION
Blake Pickett	Alabama	Unit Manager	blake.pickett@agi.alabama.gov	No
Bryan Scoresby	Alaska Division of Agriculture	Director	Bryan.Scoresby@Alaska.gov	No
Jack Peterson	AZ Dept of Ag	Associate Director, EPSD	jpgerson@azda.gov	No
Mike Stage	Arkansas	Agri Division Manager	mike.stage@agriculture.arkansas.gov	No
06/04/24	California Department of Health			
Scott Ziehr	Colorado Department of AGRiculture	Regulatory Administrator	scott.ziehr@state.co.us	No

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(3) TITLE	(4) EMAIL	(5) HAS YOUR STATE BEGUN THE ADOPTION PROCESS OF THE NEW PET FOOD LABEL MODERNIZATION
Kate Nelson	Connecticut Department of Agriculture	Ag Marketing and Inspection Representative Supervisor	kate.nelson@ct.gov	Yes
Justin Lontz	Delaware Ag	Laboratory Manager	justin.lontz@delaware.gov	No
Shaness Thomas	Florida Department of Agriculture and Consumer Services	Environmental Manager	shaness.thomas@fdacs.gov	No
Bailey Whiten	Georgia	Ag Inputs Division Director	Bailey.Whiten@agr.georgia.gov	Yes
Follow up email 6/3/24, 6/18/24	Hawaii			
Follow up email 6/3/24, 6/18/24	Idaho			
Chuck Cawley	Illinois	Division Manager	chuck.cawley@illinois.gov	Yes

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(3) TITLE	(4) EMAIL	(5) HAS YOUR STATE BEGUN THE ADOPTION PROCESS OF THE NEW PET FOOD LABEL MODERNIZATION
Trish Dunn	Indiana	Feed Administrator	pwaller@purdue.edu	No
Alan Keller	Iowa Department of Agriculture and Land Stewardship	Bureau Chief	alan.keller@iowaagriculture.gov	Yes
Jeff Jones	Kansas	Dairy & Feed Safety Program Manager	jeff.jones@ks.gov	No
Follow up email 6/3/24, 6/18/24	Kentucky			
Jonathan L. Roberts DVM	Louisiana Department of Agriculture & Forestry	Director - Feed Program Division	jroberts@ldaf.state.la.us	No
Celeste J Poulin	Maine Department of Agriculture, Conservation and Forestry	Director, Division of Quality Assurance and Regulation	celeste.poulin@maine.gov	No
tom phillips	Maryland	State Chemist	tom.phillips@maryland.gov	Yes
Michael A Botelho	MA	Director, Agricultural Food Safety	michael.botelho@mass.gov	Yes
Tim Lyons	Michigan Department of Agriculture and Rural Development	Animal Feed Section Manager	lyonst1@michigan.gov	No

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Matthew Gerths	Minnesota Department of Ag	Program Manager	matthew.gerths@state.mn.us	Yes
Buddy Brannon	MS Dept of Ag & Commerce	Branch Director	buddyb@mdac.ms.gov	No
Mary Koestner	Missouri Department of Agriculture	Program Manager	mary.koestner@mda.mo.gov	No
Falina Hutchinson	Montana	Feed & Fertilizer Specialist	fhutchinson@mt.gov	Yes
Charles Hubenka	Nebraska Department of Agriculture	Agriculture Program Specialist	charles.hubenka@nebraska.gov	No
Julia Miller-Ketcham	Nevada	Administrative Assistant III	jmillier-ketcham@agri.nv.gov	No

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Allen Wyman	New Hampshire	Director of Regulatory Services	allen.g.wyman@agr.nh.gov	No
Christian Kleinguenther	New Jersey	Bureau Chief	christian.kleinguenther@ag.nj.gov	No
Katie Laney	New Mexico Department of Agriculture	Assistant Division Director	klaney@nmda.nmsu.edu	Yes
Cory Skier	New York State Dept. of Agriculture and Markets	Food Inspector II	cory.skier@agriculture.ny.gov	No

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George Ferguson	North Carolina	Program Administrator	george.ferguson@ncagr.gov	No
Jamie Good	North Dakota Department of Agriculture	Feed Specialist	jgood@nd.gov	Yes
Chris Holton	Ohio	Agri-Inspection Manager	chris.holton@agri.ohio.gov	Yes
Follow up email 6/3/24, 6/18/24	Oklahoma			
Follow up email 6/3/24	Oregon			
David Husner	Pennsylvania Dept of Ag	Agronomic Program Specialist	dhusner@pa.gov	No
Ron Newman	Rhode Island	Ag Marketing Inspector	ron.newman@dem.ri.gov	No
Lorey Bell Grady	South Carolina Department of Agriculture	Feed Safety Program Manager	lobell@scda.sc.gov	Yes
Kylie Good	South Dakota Department of Agriculture and Natural Resources	Feed and Animal Remedy Program Specialist	Kylie.Good@stat.sd.us	No

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Bethany McAnulty	Tennessee	Program Coordinator	bethany.mcnaulty@tn.gov	No
Tim Herrman	Texas			Yes
Mark Ashcroft	Utah Department of Agriculture and Food	Program Manager	mashcroft@utah.gov	No
Follow up email 6/3/24, 6/18/24	Virginia			
Stephanie Smith	Vermont	Deputy Director, Public Health and Ag Resource Management	agr.feedseedfert@vermont.gov	No
Ashlee-Rose Ferguson	Washington State Dept of Agriculture	Animal Feed Program Manager	aferguson@agr.wa.gov	Yes
Chad Linton	West Virginia Department of Agriculture	Deputy Director of Regulatory Operations	clinton@wvda.us	No

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Jordyn Johnston	Wisconsin Department of Agriculture, Trade and Consumer Protection	Feed Program Manager	jordyn.johnston@wisconsin.gov	No
Dale Heggem	Wyoming Department of Agriculture	Assistant Manager, Technical Services Division	dale.heggem@wyo.gov	No

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(6) IF NO, WHAT OBSTACLES OR ROADBLOCKS ARE YOU RUNNING INTO?	(7) AT WHAT STAGE IN THE PROCESS TO UPDATE ARE YOU?
Blake Pickett	Alabama	<p>Technically, it is basically already adopted as just needs to have the administrative code updated to proper reference. The administrative code 80-1-9.02 Pet Food Standards. The regulations as prepared and approved by the Association of American Feed Control Officials (AAFCO) and the Pet Food Institute as same appear in the official publication of the Association of American Feed Control Officials, 1977, as recommended for adoption to govern the manufacture or distribution of feeds for animals, birds and fish normally maintained or kept in or near a household as pets, are hereby adopted by reference thereto for implementation, administration and enforcement of the sale or offering for sale of commercial feeds in Alabama as regulated by Code of Ala. 1975, Â§Â§5668, Title 2, as amended, the law which governs the sale of commercial feeds, unless such regulations as adopted herein by reference are in conflict with said law or clearly not applicable thereunder.</p>	Reviewing and updating our rules to meet my states requirements
Bryan Scoresby	Alaska Division of Agriculture	Lack of staffing and funding to engage and add a new program.	Planning Stage
Jack Peterson	AZ Dept of Ag	None as of yet. We have just gone through a rule adoption process so we are just in a momentary break.	Planning Stage
Mike Stage	Arkansas	Legislature meets next in 2025	Planning Stage
06/04/24	California Department of Health		
Scott Ziehr	Colorado Department of AGRiculture	Need to get legal review and draft changes to statute/ rules	Planning Stage

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Kate Nelson	Connecticut Department of Agriculture		Planning Stage
Justin Lontz	Delaware Ag		Planning Stage
Shaness Thomas	Florida Department of Agriculture and Consumer Services	FDACS is currently evaluating the PFLM in the context of existing Florida feed regulations to identify all potential program impacts prior to moving forward.	Planning Stage
Bailey Whiten	Georgia		Planning Stage
Follow up email 6/3/24, 6/18/24	Hawaii		
Follow up email 6/3/24, 6/18/24	Idaho		
Chuck Cawley	Illinois	<p>Lab equipment for dietary fiber will likely comprise an additional expense.</p> <p>Should resolution of the legislation in Congress submitted by PFI, AFIA, NGFA, and NARA be settled prior to state adoption of PFLM?</p> <p>With current rules and regulator discretion, the Bureau of API should be able to review and accept PFLM labels without regulatory hardship to the industry.</p>	Planning Stage

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(6) IF NO, WHAT OBSTACLES OR ROADBLOCKS ARE YOU RUNNING INTO?	(7) AT WHAT STAGE IN THE PROCESS TO UPDATE ARE YOU?
Trish Dunn	Indiana	Legislation. Opening the rule is becoming more complicated and other things will get changed	Planning Stage
Alan Keller	Iowa Department of Agriculture and Land Stewardship		Reviewing and updating our rules to meet my states requirements
Jeff Jones	Kansas	Potentially have to introduce a bill to update statues vs. updating through regulations according to our current Commercial Feedstuffs Law.	Planning Stage
Follow up email 6/3/24, 6/18/24	Kentucky		
Jonathan L. Roberts DVM	Louisiana Department of Agriculture & Forestry	Legislative changes to Commercial Feed Law are awaiting the Governor's signature. When or if signed into law, the Louisiana Agricultural Chemistry and Seed Commission will vote on regulation changes.	Reviewing and updating our rules to meet my states requirements
Celeste J Poulin	Maine Department of Agriculture, Conservation and Forestry	Must put it through the next session of our legislature.	Planning Stage
tom phillips	Maryland		Reviewing and updating our rules to meet my states requirements
Michael A Botelho	MA		Planning Stage
Tim Lyons	Michigan Department of Agriculture and Rural Development	Plan on it but haven't started yet	Reviewing and updating our rules to meet my states requirements

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(6) IF NO, WHAT OBSTACLES OR ROADBLOCKS ARE YOU RUNNING INTO?	(7) AT WHAT STAGE IN THE PROCESS TO UPDATE ARE YOU?
Matthew Gerths	Minnesota Department of Ag		Planning Stage
Buddy Brannon	MS Dept of Ag & Commerce		Reviewing and updating our rules to meet my states requirements
Mary Koestner	Missouri Department of Agriculture	State will not pursue until the PURR act is resolved or an outside entity takes the issue to the legislation. Our program cannot pursue the change. Must come from the outside.	Planning Stage
Falina Hutchinson	Montana		Reviewing and updating our rules to meet my states requirements
Charles Hubenka	Nebraska Department of Agriculture	It is a long and arduous process to get anything through our state legislature. It would need to be a high priority for our agency and state legislators.	Planning Stage
Julia Miller-Ketcham	Nevada	Nevada defers to AAFCO	

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(6) IF NO, WHAT OBSTACLES OR ROADBLOCKS ARE YOU RUNNING INTO?	(7) AT WHAT STAGE IN THE PROCESS TO UPDATE ARE YOU?
Allen Wyman	New Hampshire	<p>I am considering recommending that NH proceed through the adoption process in a manner that memorializes PLFM in NH Law and Rule on the exact date on which the 6-year adoption window ends. This allows for one set of label rules (currently existing), to which NH can affect enforcement. Between now and the adoption of PLFM, we will only register labels that meet current rules or PLFM. They must be one or the other and can include nothing in between or combinations of such. The package must have one or the other, but not both. If the old-style label is not properly met, we will use existing rule to enforce correction. If the PLFM style is presented and the label does not meet AAFCO PLFM Recommended Uniform Regulatory Recommendations, then we will deny the label as not meeting current NH Law and Rule. In the denial we will provide clarity on changes necessary to meet PLFM and, if corrected to PLFM standards, no further action will be taken. Otherwise, we will request the label meet current NH Law and Rule. In short, manufacturers who submit PLFM style between now and 6 years will be required to meet the strict definition of PLFM if we are to forgo further action...that action being a requirement to meet current NH label standards (the old way). On date certain, in six years, Law and Rule will go into effect requiring PLFM only.</p>	Planning Stage
Christian Kleinguenther	New Jersey		Planning Stage
Katie Laney	New Mexico Department of Agriculture		Planning Stage
Cory Skier	New York State Dept. of Agriculture and Markets	Consensus agreement on adoption. Agreement to adopt reached.	Planning Stage

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(6) IF NO, WHAT OBSTACLES OR ROADBLOCKS ARE YOU RUNNING INTO?	(7) AT WHAT STAGE IN THE PROCESS TO UPDATE ARE YOU?
George Ferguson	North Carolina	Waiting to see what impact the PURR Act may have on adoption.	Planning Stage
Jamie Good	North Dakota Department of Agriculture		Submitted to becoming approved
Chris Holton	Ohio		Submitted to becoming approved
Follow up email 6/3/24, 6/18/24	Oklahoma		
Follow up email 6/3/24	Oregon		
David Husner	Pennsylvania Dept of Ag	We are currently updating our law. We will then work on regulations which will incorporate the new PFLM regulations.	Planning Stage
Ron Newman	Rhode Island	Will try to do it this year.	Planning Stage
Lorey Bell Grady	South Carolina Department of Agriculture		Planning Stage
Kylie Good	South Dakota Department of Agriculture and Natural Resources	We will begin once we go through the appropriate Administrative Rule process for South Dakota in the fall	Planning Stage

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(6) IF NO, WHAT OBSTACLES OR ROADBLOCKS ARE YOU RUNNING INTO?	(7) AT WHAT STAGE IN THE PROCESS TO UPDATE ARE YOU?
Bethany McAnulty	Tennessee	We need to get a meeting with the commissioner and TDA Attorney to see if this change could be updated in rules or if we would be required to open the laws.	Planning Stage
Tim Herrman	Texas		Will codify acceptance and transition period, in the meantime, I may write a guidance document.
Mark Ashcroft	Utah Department of Agriculture and Food		Planning Stage
Follow up email 6/3/24, 6/18/24	Virginia		
Stephanie Smith	Vermont	Working with state run laboratory to design methods for new guarantee, and revising existing rule and potentially the law.	Planning Stage
Ashlee-Rose Ferguson	Washington State Dept of Agriculture		Reviewing and updating our rules to meet my states requirements
Chad Linton	West Virginia Department of Agriculture	have other priorities before this one	Planning Stage

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(6) IF NO, WHAT OBSTACLES OR ROADBLOCKS ARE YOU RUNNING INTO?	(7) AT WHAT STAGE IN THE PROCESS TO UPDATE ARE YOU?
Jordyn Johnston	Wisconsin Department of Agriculture, Trade and Consumer Protection	Opening Administrative code, training, awaiting Congress decision on PFI bill. Potential statutory and administrative code review/revision.	Planning Stage
Dale Heggem	Wyoming Department of Agriculture	Not a priority at this time	Planning Stage

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(8) IN WHAT YEAR DO THEY ANTICIPATE COMPLETING THE RULEMAKING PROCESS?	(9) WHAT ASSISTANCE CAN AAFCO PROVIDE TO YOUR STATE IN THE ADOPTION PROCESS?	(10) WHAT ASSISTANCE CAN NASDA PROVIDE TO YOUR STATE IN THE ADOPTION PROCESS?	(11) HAVE YOU SEEN ANY NEW PFLM LABELS DURING THE LICENSING/REGISTRATION PROCESS?
Blake Pickett	Alabama	2025	None at this time. Should not be an issue.	None at this time. Should not be an issue.	No
Bryan Scoresby	Alaska Division of Agriculture	unknown at present.	grant for funding so we can begin process	not sure.	No
Jack Peterson	AZ Dept of Ag	2025	Not aware of any at this point. As we move forward if there are any pitfalls other states are running into, it would be helpful to know about them. Perhaps a quarterly discussion or setting up a online forum.	Not any that I am aware of at this point.	No
Mike Stage	Arkansas	2025			No
06/04/24	California Department of Health				
Scott Ziehr	Colorado Department of AGRiculture	2026			No

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Kate Nelson	Connecticut Department of Agriculture	2025	None	None	No
Justin Lontz	Delaware Ag				No
Shaness Thomas	Florida Department of Agriculture and Consumer Services	Undetermined	AAFCO can assist FDACS by continuing to provide guidance and updates regarding state's strategies.	NASDA can assist FDACS by continuing to provide guidance and updates regarding state's strategies.	No
Bailey Whiten	Georgia	fingers crossed by 2026, but it will not be adopted by reference. At this time, we are planning to update our law/regs to reflect the key updates.			No
Follow up email 6/3/24, 6/18/24	Hawaii				
Follow up email 6/3/24, 6/18/24	Idaho				
Chuck Cawley	Illinois	Unknown	Free training, in-person, web-based, and recorded trainings for control officials and the industry	What would be considered the proper language for a specific implementation date for rule-making or legislation submitted?	No

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Trish Dunn	Indiana	6 years from now unless we get lucky	Training materials, handouts, wording for responses	Making sure federal and state legislators understand the changes and do not want to deny changing state rules.	No
Alan Keller	Iowa Department of Agriculture and Land Stewardship	2024	nothing at this time	Promote the need with state ag directors/secretaries	No
Jeff Jones	Kansas	2027	Nothing at this time but may reach out for support if introducing a bill.	Nothing at this time but may reach out for support if introducing a bill.	No
Follow up email 6/3/24, 6/18/24	Kentucky				
Jonathan L. Roberts DVM	Louisiana Department of Agriculture & Forestry		Nothing at the moment. The process just takes time.	Nothing at the moment. The process just takes time.	No
Celeste J Poulin	Maine Department of Agriculture, Conservation and Forestry	Hopefully the next two.	I will let you know.	We will reach out if assistance is needed.	No
tom phillips	Maryland	2026	none	none	No
Michael A Botelho	MA	2025			No
Tim Lyons	Michigan Department of Agriculture and Rural Development	2025/2026	Since Michigan regulation changes require a public impact study, would appreciate AAFCO's assistance in this study on how this regulation would impact the citizens of Michigan	I believe we would have support of our department's executive office and legislator's once proposed.	No

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Matthew Gerths	Minnesota Department of Ag	Already adopted	None	None	Yes
Buddy Brannon	MS Dept of Ag & Commerce	No idea			No
Mary Koestner	Missouri Department of Agriculture	Unknown	Unknown	Unknown	No
Falina Hutchinson	Montana	2025	None	None	Yes
Charles Hubenka	Nebraska Department of Agriculture	n/a	n/a	n/a	No
Julia Miller-Ketcham	Nevada				No

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Allen Wyman	New Hampshire	Considering implementation on the day after, six years from now.	Not sure yet.	Not sure yet.	No
Christian Kleinguenther	New Jersey	We do not	None at this time	None at this time	No
Katie Laney	New Mexico Department of Agriculture	2025			No
Cory Skier	New York State Dept. of Agriculture and Markets	Approximately 2-3 years.	Two copies of the newest Pet food Labeling Guide. Assistance TBD as the adoption process progresses.	Assistance TBD as the adoption process progresses.	No

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George Ferguson	North Carolina	By the end of the 6 year period	Resolving Purrr Act concerns	Resolving Purrr Act concerns.	No
Jamie Good	North Dakota Department of Agriculture	2024	Cross walk of old label and new label for our smaller pet treat manufacturers.	none at this time.	No
Chris Holton	Ohio	We have adopted the current 2024 AAFCO model bill within our OAC, rules.		Nothing at this time, other than keeping us updated on the PURR Act.	No
Follow up email 6/3/24, 6/18/24	Oklahoma				
Follow up email 6/3/24	Oregon				
David Husner	Pennsylvania Dept of Ag	2026	Letters of support when we reach that point.	Letters of support when we reach that point.	Yes
Ron Newman	Rhode Island	End of 2024, beginning of 2025.	Will contact you when we have have questions	Will contact.	No
Lorey Bell Grady	South Carolina Department of Agriculture	2028	Continued guidance regarding PFLM label review, additional trainings, resources to share with industry, etc.	Continued information sharing and resources to support the adoption of PFLM	No
Kylie Good	South Dakota Department of Agriculture and Natural Resources	2025	At this time AAFCO is providing the guidance that we need	At this time NASDA is keeping South Dakota up to date on information and notices from other agencies	No

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Bethany McAnulty	Tennessee	Within the 5 years.	None at this time	None at this time	Yes
Tim Herrman	Texas	2024			
Mark Ashcroft	Utah Department of Agriculture and Food	2028-29	We are just waiting for all of the associated controversies and discussions to be settled first.	Helping to resolved associated issues.	No
Follow up email 6/3/24, 6/18/24	Virginia				
Stephanie Smith	Vermont	2026	No assistance needed at this time.	No assistance needed at this time.	No
Ashlee-Rose Ferguson	Washington State Dept of Agriculture	This year	Supportive public comments during the comment period Work to encourage other states to begin the adoption process. Training for other program administrators on law and rule making processes. Education and outreach by AAFCO and NASDA to the applicable parties large (news articles, handouts, etc.) and small scale (phone calls, hallway conversations, etc.).	Supportive public comments during the comment period	No
Chad Linton	West Virginia Department of Agriculture	2026	none	none	Yes

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Jordyn Johnston	Wisconsin Department of Agriculture, Trade and Consumer Protection	2030	Continued communication and education/training materials. Continue to advocate for the AAFCO membership and stakeholders during the adoption process.	Continued communication and updates on PFI bill status. Continue to advocate for the State Departments of Agriculture during the adoption process.	No
Dale Heggem	Wyoming Department of Agriculture	Estimate 2028 or 2029			Yes

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(12) IF YES, ARE YOU UTILIZING ENFORCEMENT DISCRETION DURING THIS TRANSITION PERIOD?
Blake Pickett	Alabama	Yes
Bryan Scoresby	Alaska Division of Agriculture	No
Jack Peterson	AZ Dept of Ag	Yes
Mike Stage	Arkansas	
06/04/24	California Department of Health	
Scott Ziehr	Colorado Department of AGRiculture	

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(12) IF YES, ARE YOU UTILIZING ENFORCEMENT DISCRETION DURING THIS TRANSITION PERIOD?
Kate Nelson	Connecticut Department of Agriculture	
Justin Lontz	Delaware Ag	
Shaness Thomas	Florida Department of Agriculture and Consumer Services	
Bailey Whiten	Georgia	Yes
Follow up email 6/3/24, 6/18/24	Hawaii	
Follow up email 6/3/24, 6/18/24	Idaho	
Chuck Cawley	Illinois	Yes

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(12) IF YES, ARE YOU UTILIZING ENFORCEMENT DISCRETION DURING THIS TRANSITION PERIOD?
Trish Dunn	Indiana	Yes
Alan Keller	Iowa Department of Agriculture and Land Stewardship	
Jeff Jones	Kansas	
Follow up email 6/3/24, 6/18/24	Kentucky	
Jonathan L. Roberts DVM	Louisiana Department of Agriculture & Forestry	
Celeste J Poulin	Maine Department of Agriculture, Conservation and Forestry	
tom phillips	Maryland	
Michael A Botelho	MA	No
Tim Lyons	Michigan Department of Agriculture and Rural Development	Yes

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(12) IF YES, ARE YOU UTILIZING ENFORCEMENT DISCRETION DURING THIS TRANSITION PERIOD?
Matthew Gerths	Minnesota Department of Ag	Yes
Buddy Brannon	MS Dept of Ag & Commerce	
Mary Koestner	Missouri Department of Agriculture	
Falina Hutchinson	Montana	Yes
Charles Hubenka	Nebraska Department of Agriculture	
Julia Miller-Ketcham	Nevada	

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(12) IF YES, ARE YOU UTILIZING ENFORCEMENT DISCRETION DURING THIS TRANSITION PERIOD?
Allen Wyman	New Hampshire	
Christian Kleinguenther	New Jersey	No
Katie Laney	New Mexico Department of Agriculture	
Cory Skier	New York State Dept. of Agriculture and Markets	

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(12) IF YES, ARE YOU UTILIZING ENFORCEMENT DISCRETION DURING THIS TRANSITION PERIOD?
George Ferguson	North Carolina	
Jamie Good	North Dakota Department of Agriculture	
Chris Holton	Ohio	
Follow up email 6/3/24, 6/18/24	Oklahoma	
Follow up email 6/3/24	Oregon	
David Husner	Pennsylvania Dept of Ag	Yes
Ron Newman	Rhode Island	
Lorey Bell Grady	South Carolina Department of Agriculture	
Kylie Good	South Dakota Department of Agriculture and Natural Resources	Yes

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(12) IF YES, ARE YOU UTILIZING ENFORCEMENT DISCRETION DURING THIS TRANSITION PERIOD?
Bethany McAnulty	Tennessee	Yes
Tim Herrman	Texas	
Mark Ashcroft	Utah Department of Agriculture and Food	
Follow up email 6/3/24, 6/18/24	Virginia	
Stephanie Smith	Vermont	
Ashlee-Rose Ferguson	Washington State Dept of Agriculture	
Chad Linton	West Virginia Department of Agriculture	Yes

(1) NAME (FIRST AND LAST)	(2) STATE AGENCY	(12) IF YES, ARE YOU UTILIZING ENFORCEMENT DISCRETION DURING THIS TRANSITION PERIOD?
Jordyn Johnston	Wisconsin Department of Agriculture, Trade and Consumer Protection	
Dale Heggem	Wyoming Department of Agriculture	Yes

Appendix C

Literature Considered

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Dobenecker B, Webel A, Reese S, Kienzle E. Effect of a high phosphorus diet on indicators of renal health in cats. *J Feline Med Surg* 2018; 20 339-343. DOI: 10.1177/1098612X17710589.

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Lineva A, Kirchner R, Kienzle E, Kamphues J, Dobenecker B. A pilot study on in vitro solubility of phosphorus from mineral sources, feed ingredients and compound feed for pigs, poultry, dogs and cats. *J Anim Physiol Anim Nutr* 2019; 103:317-323. DOI: 10.1111/jpn.12986