



**AAFCO**  
Association of American Feed Control Officials

2025

**RESOLUTION NUMBER: 2025-001-02**

**DATE: Floor Amendment Passed 8/4/25**

**AMENDMENT SUBMITTED BY: Trish Dunn (IN)**

**ORIGINAL RESOLUTION SUBMITTED BY: Erin Bubb (PA), Josh Arbaugh (WV), Ashlee-Rose Ferguson (WA), Rebecca Moseley (AL), Kristen Green (KY), Tim Darden (NM), Ali Kashani (WA), Eric Nelson (Retired-FDA), Ken Bowers (Retired-KS)**

---

**Concerning:** The U.S. House of Representatives Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2026 (H.R. 4121) as introduced on June 25, 2025, the PURR Act of 2025 (H.R. 597) as introduced on January 21, 2025, and any other iteration of those bills or new legislation that seeks to preempt state authority over animal food.

**Whereas** AAFCO believes the intent of Sec. 772(b)(2) of H.R. 4121 and Sec. 425(b) of H.R. 597 is to preempt state authority over all animal food, granting the U.S. Food and Drug Administration sole authority to regulate animal food in the U.S. without oversight or intervention from state animal food programs or regulators;

**Whereas** AAFCO believes Sec. 425(g) of H.R. 597 will create a lack of transparency in labeling due to the inability of state regulatory programs to request substantiation of labeling and advertising claims, allowing claims on packaging that have not been verified as truthful and not misleading;

**Whereas** AAFCO believes Sec. 772(b)(2) of H.R. 4121 and H.R. 597 are obstructions to the principles and practices of an Integrated Food Safety System, which combines the resources, experience, subject matter expertise and efforts from state and federal partners to create an integrated global food safety network that demonstrates a commitment to ensuring that consumers and their animals have access to safe and wholesome animal foods for purchase;

**Whereas** AAFCO believes the model bills and regulations published in the AAFCO Official Publication, including those governing ingredient definitions, labeling, manufacturing practices, and enforcement, represent a comprehensive, science-based framework collaboratively developed by states with participation from the FDA and industry, and have been widely adopted by individual states as the basis for their regulatory programs;

**Whereas** Section 772 of H.R. 4121, as introduced by the House Committee on Appropriations, affirms this long-standing process by recognizing that ingredients defined through the AAFCO process are Generally Recognized as Safe (GRAS) when used as intended, thereby promoting consistency, scientific rigor, and public trust;

**Whereas** AAFCO believes that substantive changes to food safety law, particularly those involving regulatory authority, should be considered through regular legislative order rather than through an appropriations vehicle; and

**Whereas** Sec. 772 of H.R. 4121 and H.R. 597 will increase the burden on the FDA by authorizing additional authority without additional appropriations or a mechanism that would allow the agency to work in cooperation with domestic partners after a historical reduction in workforce; now, therefore, be it

**Resolved**, that AAFCO supports the language in Section 772 of H.R. 4121, with the exception of (b)(2) as introduced, specifically its recognition of the AAFCO Official Publication model regulations and the GRAS status of defined ingredients, and

**Be it further Resolved** that the Association of American Feed Control Officials shall not support the language in Sec. 772(b)(2) of H.R. 4121 as passed by the House Committee on Appropriations or as introduced in H.R. 597, or other legislation that would preempt or diminish the regulatory authority of state animal feed programs, and

**Be it further Resolved**, AAFCO and its members will work with partners, industry, and other trade associations to urge Congress to reject the addition of the language in Sec. 772 of H.R. 4121 as passed by committee, H.R. 597, and any future iterations or bills that preempt state authorities on animal food and that don't support the ability of state programs to regulate animal food at a level equal to that of federal agencies, and

**Be it further Resolved**, AAFCO will always strive to collaboratively work with relevant parties in transparency to develop model rules, regulations, and guidance that is fair, consistent, and that promotes harmonization and innovation while maintaining safety and consumer protection.