

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

**MINUTES OF THE PET FOOD COMMITTEE (PFC) ANNUAL MEETING
HELD AT THE HILTON OMAHA
1001 CASS STREET
OMAHA, NEBRASKA
AUGUST 5, 2025, 1:30 P.M. CT**

MEMBERS:

Holly Jewell (Co-Chair)
Liz Beckman (Co-Chair;
via teleconference)
Lorey Bell-Grady
Kelsi Brown
James Embry
Tiffany Leschishin

Kimberly Truett (via
teleconference)
Kristen Green
Kristen Hamilton (via
teleconference)
Jo Lynn Otero
Jennifer Roland

Barbara-Jean
Schliecher
Katie Simpson
Charlotte Conway (via
teleconference)
Karen Donnelly
George Ferguson
Justin Hill

ADVISORS:

Cathy Alinovi
Bill Bookout
Berit Foss
Jennifer Gornert

Pam Kaufman
Chris Nash
Charles Starkey
Louise Calderwood

Angele Thompson
Pat Tovey

GUESTS:

Kathy Gross
Lori Goshert

Adjunct Professor, Kansas State University
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 1:30 p.m.

2. WELCOME AND ANNOUNCEMENTS

Holly Jewell and Liz Beckman welcomed attendees.

3. MICRO-ORGANISM/ENZYME LANGUAGE FOR PF5(A), (B)

On a motion made by Kristen Green, seconded by Tiffany Leschishin, it was resolved to accept the adjusted language for PF5(a) and (b), with the exact placement in the model bill to be discussed and voted on at a later date. Motion carried.

The Committee reviewed the adjusted language for PF5(a) and (b) regarding micro-organisms and enzymes. A reference to 4(g) was removed. There was a discussion regarding the options for placement.

Katie Simpson noted there are now two columns under nutrition facts labeled guarantee and household unit, and asked what the difference was between them. Angele Thompson responded that the amount in one column is CFU, and CFU/g in the other.

4. NUTRIENT PROFILE PLACEMENT DISCUSSION

On a motion made by Kristen Green, seconded by Jo Lynn Otero, it was resolved to place the information regarding nutrient profiles immediately before the headline reading “AAFCO Dog and Cat Food Nutrient Profiles – Introduction.” Motion carried.

5. PURPOSE STATEMENT AS IT RELATES TO INGREDIENTS

On a motion made by Katie Simpson, seconded by Kristen Green, it was resolved to create a workgroup to investigate and draft options to specify how the life stage of a pet should be communicated on packaging for food containing ingredients approved only for certain life stages. Motion carried.

ACTION – Holly Jewell and Liz Beckman will send the proposal created by Pam Kaufman and Angele Thompson to the Committee for review.

Katie Simpson noted that the purpose statement was designed to clearly communicate the purpose of the product to the consumer on the principal display panel (PDP). The purpose statement was formerly referred to as the intended use statement. Some feed ingredients are only approved for use in adult life stages. If a treat, food, supplement, or food mixer contains an ingredient with a limited life stage, the limited life stage for the product must be clearly communicated in the purpose statement on the PDP.

Katie Simpson shared examples of ingredients only approved for adult pets. She proposed adding the following verbiage to Regulation PF4(a)(1):

- D. A life stage may be added before the species, e.g., “Adult Dog Treat.”
- E. A life stage may be added before the species, e.g., “Adult Dog Food Supplement.”
- F. A life stage may be added before the species, e.g., “Adult Dog Food Mixer.”

It was noted that Item G already has language stating that a limited life stage may be indicated. This section contains verbatim statements for use on packaging. There was a discussion regarding the specificity of the life stage.

Angele Thompson noted that she, and Pam Kaufman had submitted a one-page proposal summarizing the issue, highlighting some obstacles, and providing guiding language, but they did not have time to circulate it.

See Appendix A and B.

6. PET FOOD LABEL MODERNIZATION (PFLM) UPDATE

6.1 State Survey

Jennifer Roland shared the results of the 2025 PFLM survey, noting that 44 out of 50 states had responded. A total of six states have adopted the rulemaking process, while 12 plan to do so in 2025 or 2026. To assist them, AAFCO can continue to provide guidance and updates on state strategies as well as training, education, and outreach. A total of 31 states reported seeing PFLM labels during the licensing and registration process, and all of these states are using enforcement discretion. Of the aforementioned 31 states, 19 reported seeing hybrid labels, and 13 of those have requested revisions.

Out of 18 laboratories, five analyze for total dietary fiber (TDF). Of those who answered “no,” seven indicated that TDF is of interest to the regulatory program. Louise Calderwood provided the update on industry concerns.

Industry

Pat Tovey shared industry feedback to the PFLM implementation, noting that new labels are being used at the rate expected for the time period. The Pet Food Institute (PFI) hosted a series of six webinars that were well attended and currently available on the PFLM section of the PFI website. Other in-person events were well attended. There were discussions regarding how nutrition facts sections for pet food mirror that of human food. Veterinarians have asked why there are minimum and maximum numbers in nutrition facts sections rather than exact numbers, and this was explained. The Laboratory Methods and Service Committee is investigating concerns regarding testing measurements.

Industry professionals have raised concern that some states are experiencing difficulty in meeting the requirements for formal PFLM adoption. They are also concerned about the availability and variation of dietary fiber testing and states’ sensitivity to the Pet Food Uniform Regulatory Reform Act regarding PFLM. There are bottlenecks related to TDF testing. A future bottleneck may be caused by printing capacity as more companies engage in label modernization.

7. **NEW APPROACH TO COMBAT PET OBESITY**

Dr. Kathy Gross shared a presentation called “Combating the Pet Obesity Epidemic with New Food Approaches and Ingredients.” Approximately 61% of cats and 59% of dogs are obese, but most pet owners believe their pets are at a healthy weight. She shared a list of factors contributing to excess weight in pets and statistics for pet activity. While reducing food can reduce calories, it also reduces the daily intake of essential nutrients. AAFCO has an opportunity to create nutritional guidelines for reduced-calorie foods.

Kathy Gross shared ingredients that can be balanced to achieve lower calorie and fat levels, noting that one size does not fit all. She reported that excess body fat creates inflammation, which affects all body organs. Weight gain can also be exacerbated by metabolism changes as well as the gut biome, which is an emerging science.

A collective effort is needed to provide new approaches to combat obesity in pets. Those in the pet food industry should focus on nutritional design, ingredient selection, new ingredients, calorie calculations, and feeding guidelines. She noted that because most house pets are already overweight or at a high risk of becoming fat, pet food makers should shift their focus to make more products for obese-prone or overweight pets, ensure accurate calorie content on products, and adapt feeding guidelines to recommend lower calorie intake. Regulatory partners should add regulatory guidelines for weight-control pet foods, approve alternative metabolizable energy calculations, and prioritize new ingredient approvals.

8. **HUMAN GRADE WORKGROUP**

On a motion made by Kristen Green, seconded by Tiffany Leschishin, it was resolved to charge the Human Grade Workgroup to consider allowing additional third parties to substantiate human grade claims and equivalency within 21 CFR 117. Motion carried.

Holly Jewell noted that the Human Grade Workgroup was charged to refresh its membership, establish a FAQ page dedicated to human-grade pet food claims, develop training materials for the USDA’s AMS auditors, and establish a human-grade FAQ workgroup.

The Workgroup requested a charge from the Pet Food Committee to edit the human-grade guidelines to consider allowing additional third parties to substantiate human-grade claims and equivalency within 21 CFR 117.

It was noted that the charge is vague and the phrase “third parties” may need expanding. It was suggested that “to edit the human grade guidelines” be removed from the charge, as edits would need to be discussed by the full Committee. Identifying potential third parties would be the first step. It was noted that some ingredients used in pet food do not have a human grade.

9. TRAINING AND OUTREACH SUBCOMMITTEE

9.1 Regulator/Industry Work Group

This item was not discussed.

9.2 Consumer/Veterinary/Retailer Work Group

This item was not discussed.

9.3 Training and Outreach Events

This item was not discussed.

9.4 Pet Food Forum

This item was not discussed.

9.5 2025 Annual Pet Food Workshop

Tiffany Leschishin reported that registration is open online for the AAFCO and NASC Pet and Specialty Pet Food Labeling Workshop scheduled for August 6 and 7, 2025, in Omaha.

10. OTHER TOPICS FOR DISCUSSION/NEW BUSINESS

There were no other topics for discussion or new business.

11. ADJOURNMENT

On a motion made by Katie Simpson and carried, it was agreed that there was no further business to transact; the meeting closed at 3:09 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

Pet and Specialty Pet Purpose Statement

Regulation PF4

The Purpose Statement was designed to clearly communicate the purpose of the product to the consumer on the principal display panel (PDP)



Pet and Specialty Pet Purpose Statement

Some feed ingredients are only approved for use in adult life stages.

If a treat, food supplement, or food mixer contains an ingredient with a limited life stage, the limited life stage for the product must be able to be clearly communicated in the Purpose Statement on the PDP.

Pet and Specialty Pet Purpose Statement

Current ingredient examples with limited life stage:



33.29 Black Soldier Fly Larvae Oil – adult dog

T33.29 Black Soldier Fly Larvae Oil – adult dog and adult cat food

60.117 Dried Black Soldier Fly Larvae – adult dog

101.30 Krill Meal – adult dog

T60.121 Dried Mealworm Meal – adult dog

Pet and Specialty Pet Purpose Statement

Propose adding the following verbiage to Regulation PF4(a)(1)

D. A life stage may be added before the species, e.g. “Adult Dog Treat”

E. A life stage may be added before the species, e.g. “Adult Dog Food Supplement”

F. A life stage may be added before the species, e.g. “Adult Dog Food Mixer”

PF4 Purpose Statements and Ingredient Definitions with Use Restrictions

There are some questions regarding the purpose statement on a product that includes ingredients with definitions that include use restrictions. For example, black soldier fly larvae is currently allowed in adult dog food and soon will be allowed in adult cat foods. The limited verbatim statements provide clarity for the consumer. There are 7 basic options, each have a species component along with an indicator of nutritional adequacy. Six of the seven basic options are quite short and simple. The one complex option is the ‘qualified’ complete food option. For this option, there are two wordings and there are 4 life stage variables.

Current list:

- Complete ____ Food, blank is species
- Complete Food for _(life stage) (Species) __ or Complete _(life stage) (Species) Food
 - Adult
 - Puppies or Kittens or Juvenile
 - Puppies (< 70 lb as an adult)
 - Dogs (except puppies >70lb as an adult)
- Veterinary Diet for (species),
- (species) _ Treat,
- (Species) _ Food Supplement,
- (species) __ Food Mixer,
- Daily _(specialty pet species) Food

Some ingredient definitions include use restrictions that specify not only a species but may also specify a life stage/class. Two recent examples are black soldier fly larvae (BSFL) which is limited to adult dog food. There is an addition pending of ‘and in adult cat food.’ A second example is L-carnitine, where the restrictions are more complex. The use list includes not only species but also levels.

The purpose statements, other than for complete foods, do not include indications of life stage. This would seem to set up a possible scenario where an ingredient definition might have a use restriction that would then not be indicated in the purpose statement. Of main concern are treats, food mixers and food supplements that might include ingredients which have use restrictions.

Industry is suggesting that the easiest way to address this would be to have AAFCO consider leaving the purpose statement stand as they are currently written. **When a product includes an ingredient with a use restriction, the principal display panel must state the restriction life stage, outside of the purpose statement, in type “at least as large as” the purpose statement.**