Model Bills and Regulations Committee Agenda

Wednesday August 4, 2021
3:00pm – 3:45pm (EDT)

Meeting access:

Full access registration includes the live webcast of this committee meeting. The virtual service provider for this meeting is the same provider AAFCO worked with in January for the 2021 AAFCO Midyear Meeting.

July 26: full access registrants receive their username and password along with a video offering instruction on how to access and use the portal. Because of the updates to the platform, we recommend you watch this video to be sure you maximize your experience.

Lost your access codes or need other technical support for the video platform? Email support@performedia.com. any time you need assistance—even during or after our meeting.

Full access registrants may use these buttons during our meeting:

- Join Live Sessions
- Chat – make an inquiry which is visible to all meeting attendees
- Ask a Question – make an inquiry privately, and automatically send an email to AAFCO representatives
- Schedule – single page agenda-at-a-glance for the full meeting (all days)
- Speakers – pictures and brief biographies of the panelists and the keynote speakers
- Resources – agenda book will be available to download here along with other helpful resources
- Button to launch a PDF of committee members and advisers in the meeting (nonparticipating committee members or advisers will not be noted, and late arrivals may not be on the list)

The chat feature will be available to everyone with full access registration and is one option for questions during committee meetings. Chat is not planned to be used for voting at this meeting.

At the direction of the committee chair, verbal comments may be made during committee meetings. Instructions for joining a queue to voice a comment during a committee meeting will be provided in the platform after you log in with your username and password.

Complimentary live-audio listen-only access (no video webcast access) will be available. The connection to access this complimentary feature will be available via a button on the video platform. No access to the webcast features and benefits available under the full access registration will be available for listeners selecting this option. If you decide you need to upgrade to full access registration, you are invited to do so at any time during our meeting through the Meetings page on our website.

Committee members—please log on 45 minutes prior to each session to allow the vice chair to determine quorum and to do audio checks.

Agenda Topics:

1. Welcome and Committee Member Introductions

2. 2021 Mid-year Meeting Minutes (approved as written on 3/5), February 17 – March 2 e-Meeting (approved as written on 3/5) and June 15-22 e-Meeting (approved as written on 6/22), posted on AAFCO web-site and in the Feed BIN, included in the General Session packet.

3. Committee/Work Group reports –
   a.) "Labeling" work group report -George
   b.) "Flavors" work group report - Dan

4. Old Business –

5. New Business –
   a.) Human Grade Pet Food Guidelines (see attachment)
   b.) What about 21 CFR 501.22 Colors? work group or hand off

6. Assignments/homework for annual meeting

7. Adjourn

ATTACHMENT

Guidelines for "Human Grade" Pet and Specialty Pet Food Claims

AAFCO recommends and supports the following guidelines for the use of the term "human grade" in the labeling of pet foods and specialty pet foods. Pet and specialty pet foods using the labeling claim "human grade" are first and foremost animal food products and subject to inspection under 21 CFRpart 507. In order to substantiate that a human grade claim is truthful and not misleading, these guidelines describe how all human grade pet food products should be manufactured in accordance with the applicable humanfood regulations for a ready-to-eat human food.

(1) 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 those applicable federal human food laws as required by ingredient, process and/or facility type.

(2) All facilities that process or package a final "human grade" pet food productthat is considered ready-to-eat must be registered as both an FDA food facility and an FDA feed facility.
It shall be the manufacturing firm's responsibility to ensure it is able to manufacture in a human food facility and be licensed/registered and inspected by the authorized agency for human food production. Human Grade Pet Food claims are voluntary, and as such, no feed control official, neither state nor federal, can mandate that a human food authority license a facility that is only manufacturing a pet food product.

(3) The firm must maintain written procedures to help ensure "human grade" products are stored, transported, and handled throughout the distribution channel in a manner that maintains the product's "human grade" status.

(4) In order to substantiate that a "human grade" pet food claim is truthful and notmisleading on products under the federal authority of FDA for human food production and subject to 21 CFR Part 117, the firm must maintain and make available upon request, documentation sufficient to show that:

a. All individual ingredients supplied to the manufacturer that are furtherutilized in the manufacture of human grade pet food, are fit for humanconsumption;
b. Every ingredient and the resulting product are stored, handled, processed, and transported in a manner that is consistent and compliant with 21 CFR part 117 and the final product is consideredready-to-eat;
c. The manufacturing facility is licensed to produce human food by all appropriate/required authorities.

(5) In order to substantiate that a "human grade" pet food claim is truthful and notmisleading, on products that are under the federal authority of an agency other than FDA for human food production (e.g., USDA FSIS):

a. Where final processing (i.e., mixing, blending) and/or packaging occurs in a registered FDA Human Food Facility subject to 21 CFRPart 117, the firm must maintain and make available upon request,documentation sufficient to verify that:
    i. The product is ready-to-eat with all included ingredients processed, packed, held and shipped in compliance with theapplicable federal regulations for the manufacture of human foods prior to final mixing/blending and/or packaging;

ii. All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatoryauthority to produce human food;

iii. The FDA facility that processes and/or packs the "HumanGrade" Pet Food is licensed to produce human food by allappropriate/required authorities.

b. Where final processing (i.e., mixing, blending) and/or packaging occurs in a non-FDA food facility producing human food (e.g., slaughter plant), the firm must maintain and make available uponrequest, documentation sufficient to verify that:

i. The product is ready-to-eat with all included ingredients processed, packed, held and shipped in compliance with theapplicable federal regulations for the manufacture of human foods prior to final mixing/blending and/or packaging; All facilities utilized in the manufacture of the included ingredients are authorized by the appropriate regulatoryauthority to produce human food;

ii. The processing and/or packing of the final product is conductedin an area/room identified within the facilities required HACCP/Food Safety Plan as an area/room dedicated to the blending, packaging, repackaging and/or labeling of an edible ready-to-eat food;

iii. The non-FDA facility that processes and/or packs the "HumanGrade" Pet Food is licensed to produce human food by all appropriate/required authorities.

(6) The manufacturer of a pet food or specialty pet food product with "humangrade" claims must ensure:

a. It is clearly labeled for its intended use as animal food, such as "dogfood" or "cat treats;

b. No statements of quality or grade appear in the ingredient statement[PF5(d)(3)];

c. The largest or most prominent use of the term "human grade" on eachpanel of the label and any labeling (brochures, point of sale materials,websites, etc.) must be juxtaposed with the statement of intended use(e.g., human grade dog food or human grade cat treats), in the same style, color print, and type size as the term "human grade".

d. A claim of "human grade ingredients" is only acceptable if the productas a whole meets the requirements of the "human grade" pet food term; and

e. The label is in compliance with all applicable labeling rules, includingany voluntary labeling allowed under participation in the Agriculture Marketing Service Process Verified Program.