

THE ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS

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One of my personal objectives in writing this nutrition column is to counter some of the misinformation being circulated regarding pet food and pet nutrition. This month's topic is the Association of American Feed Control Officials (AAFCO), an American organization that is involved in regulating pet foods and livestock feeds in the USA.

In the US, pet food companies have no choice but to follow AAFCO guidelines. Government officials in all 50 states work diligently to enforce AAFCO regulations and lack of compliance can have serious consequences. Canadian pet food companies on the other hand, have no legal requirement to comply with AAFCO, unless they intend to sell their pet foods in the US. However, AAFCO has a strong working relationship with the Canadian government and the Canadian pet food industry. In fact, the current President Elect of AAFCO is Judy Thompson who works for the Canadian government at the Canadian Food Inspection Agency in Ottawa.

If you are feeding a major brand of pet food, you already have some exposure to AAFCO. Somewhere on your bag of pet food, you should be able to find one of the following AAFCO claims:

Statement 1 – “Animal feeding tests using AAFCO procedures substantiate that (Name of Product) provides complete and balanced nutrition for (life-stage).”

Statement 2 – “(Name of Product) provides complete and balanced nutrition for (life-stage) and is comparable in nutritional adequacy to a product which has been substantiated using AAFCO feeding tests.”

Statement 3 – “(Name of Product) is formulated to meet the nutritional levels established by the AAFCO Dog Food Nutrient Profiles for (life-stage).”

Statement 4 – “This product is intended for intermittent or supplemental feeding only.”

These “nutritional adequacy” claims are defined by AAFCO and one of these statements must appear on every bag or can of pet food sold in the USA.

Let's examine what each of these claims means.

Statement 1 refers to a dog food that has been fed to dogs in an AAFCO feeding trial. These trials last for six months and involve at least 8 healthy dogs. Each dog is examined by a veterinarian at the beginning and at the end of the trial. Food consumption is measured and recorded daily. Individual body weights are measured at the beginning and end of the trial and weekly throughout the trial. Blood samples are taken from each dog at the end of the trial and analyzed for hemoglobin, packed cell volume, serum alkaline phosphatase and serum albumin. Dogs may be removed for poor food intake only during the first two weeks of the trial but up to 25% of the starting dogs may be removed for non-nutritional reasons at any time during the trial. These are six month trials and occasionally pets must be taken out of the trials for reasons unrelated to the food.

The diet is considered to have failed the feeding trial if any dog shows clinical or pathological signs of nutritional deficiency or excess, if any dog fails to complete the trial for food related reasons, if any dog loses more than 15% of its starting body weight or if any dog's blood tests show values outside normal ranges.

The most common reason for a food failing an AAFCO feeding trial is poor palatability leading to inadequate consumption and weight loss. Six month feeding trials are fairly expensive to conduct, so diets are invariably analyzed and shown to be complete and balanced before they are committed to

this type of trial. For this reason, trial failure due to nutritional deficiency or excess is virtually unheard of.

In order to have Statement 2 or Statement 3 on the packaging, a pet food must be analyzed by an independent laboratory and shown to meet the nutritional guidelines established by AAFCO. These guidelines define the minimum levels for all essential nutrients for dogs, and also provide maximum levels for some nutrients known to be harmful at high levels, such as calcium, zinc and vitamin E. These two AAFCO statements do not require any kind of feeding trial.

Statement 4 is most often seen on treats or snacks but may appear on packaging of very poor quality foods that are not complete and balanced. All pet foods sold in the US, including treats, must have an AAFCO claim on their packaging. Statement 4 is the catch-all claim that appears on products that fail to meet the requirements for any of the other three claims. However, this statement may also appear on a food specifically formulated for weight loss. Since these diets should, by design, cause more than a 15% loss of body weight over a six month period, they should fail an AAFCO feeding trial. Some veterinary therapeutic diets that are designed for short term feeding may also bear this claim.

As well as nutritional adequacy claims, AAFCO also regulates all other aspects of pet food labeling. This includes providing a clear definition for descriptors such as “light”, “lean”, “new and improved”, “chicken flavour” and “controls tartar”. It also includes defining and describing all ingredients used in a pet food and ensuring that pet food companies list ingredients in descending order on the packaging. AAFCO defines which nutrients must appear in a guaranteed analysis statement, and mandates that all pet foods provide a feeding guide on the packaging.

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According to AAFCO, the association's goal is "to provide a mechanism for developing and implementing uniform and equitable laws, regulations, standards and enforcement policies for regulating the manufacture, distribution and sale of animal feeds and pet foods; resulting in safe, effective, and useful products."

AAFCO "maintains an association through which officials of any state or other government agency charged with a responsibility in enforcing the laws regulating the production, labeling, distribution, or sale of pet foods may unite to explore the problems encountered in administering such laws, to develop just and equitable standards, definitions and policies to be followed in enforcing such laws, to promote uniformity in such laws, regulations and enforcement policies, and to cooperate with members of the industry producing such products in order to promote the effectiveness and usefulness of such products."

In other words, AAFCO is an organization established to protect and benefit pets by defining standards and enforcing laws that result in the production of safe, effective and useful pet foods.

There are three myths with respect to AAFCO that need to be addressed.

Myth #1 – AAFCO is a consortium of pet food companies who are self-regulating in their own best interests, not in the interests of the pet.

This statement is absolutely false. As described above, AAFCO is a US government agency that operates within the US Department of Agriculture and is closely associated with the Food and Drug Administration (FDA). It does invite pet food company personnel to sit on various committees but these committee members are not employees of AAFCO. As stated above, part of AAFCO's role is to cooperate with members of the industry in order to promote the production of good products. This is a similar role to that of the FDA, an organization that by necessity works closely

with pharmaceutical companies but whose ultimate responsibility is to protect consumers. AAFCO's mandate is to regulate the quality and safety of pet food, not to satisfy the demands of the companies that produce them.

Myth #2 – AAFCO requires pet food testing that is cruel and inhumane.

This is false on two fronts. First, AAFCO feeding trials are not cruel or inhumane. In fact, great care is taken to ensure the health and safety of all animals participating in a trial. The fact that 25% of pets can be removed from a trial at any time encourages compassion in conducting these trials. AAFCO trials do not require that animals be housed in small pens without access to exercise, grooming or environmental stimulation. No doubt there are good testing facilities and bad testing facilities and concerned pet owners should investigate and do their best to support products that are tested in good facilities. It is however ill advised to avoid products bearing an AAFCO claim in order to make a statement against animal testing. In fact, what you are doing in that case is encouraging unscrupulous pet food companies to put unanalyzed and untested products on the market that put your pet and everyone else's pet at risk.

But all of that is irrelevant anyway because AAFCO claims do not require feeding trials. Statements 2 and 3 both provide assurance of diet adequacy and neither involve a feeding trial. Every single pet food sold in the US must bear an AAFCO claim and the vast majority of these products bear one of these two statements.

Myth #3 – Pet foods without AAFCO claims are as sound and reliable as those with AAFCO claims

AAFCO was established by the US government specifically to eliminate self-regulation by pet food companies and to put the regulation of pet food labeling, ingredients and claims in the hands of an independent third party. American pet owners do not need to rely on the word of the company making a

food, they can rely on a government regulatory body policing the industry. An AAFCO claim provides legitimacy and third party assurance of a product's safety and efficacy. A pet food without an AAFCO claim may very well be every bit as sound and reliable as one with an AAFCO claim. But as a pet owner, you have no way of knowing whether this is the case or not.

It is well worth noting that in the absence of a Canadian equivalent to AAFCO, it is of immense benefit to Canadian pet owners that most Canadian pet food companies choose to comply with AAFCO regulations.