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Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Docket No. 2007-N-0442 – Opportunity for Public Input on Standards for Pet Food and Other Animal Feeds; Notice of Meeting

Dear Sir or Madam:

The American Veterinary Medical Association (AVMA) is the world's largest veterinary association, representing nearly 85% of our nation's veterinarians. The mission of the AVMA is to advance the science and art of veterinary medicine. As veterinarians, our utmost concern is our nation's public health and the health of our animals.

We appreciate the opportunity to provide recommendations on labeling and safety standards for pet foods, as the FDA implements the mandates set forth within the Food and Drug Administration Amendments Act of 2007. The FDA is to be commended on its engagement with stakeholders and the general public on these issues, which are so important for the health of our nation's pets.

The AVMA has three specific recommendations for the FDA to consider during its planning and implementation process:

**1. Modification of the labels on pet foods with health claims**

Today's marketplace contains a wide variety of pet foods. Specific pet foods range from regional specialty and private label foods to national corporate brands. They are also provided in a vast array of forms, including raw, frozen, freeze dried, canned, semi-moist and dry foods. Furthermore, these products are sold through a gamut of different retail outlets – supermarkets, feed stores, groomers, boutiques and large format pet stores, as well as veterinary facilities.

There is also an ever-increasing trend to include various health claims on pet foods. Clearly these health claims promote that the food does more than just meet nutritional requirements of the healthy animal. For example, a food might be marketed for senior dogs with the claim that it will improve joint health via inclusion of certain specific nutrients.

The AVMA also recognizes that by federal mandate, the FDA regulates pet foods, but it has elected to utilize a significant degree of enforcement discretion in its oversight of pet foods with health claims. Many foods with health claims are only available through veterinarians to ensure professional supervision of foods with potent therapeutic effects. Veterinarians are expected to be able to discern whether the claims are substantiated, or not, before recommending them to their clients. This is a real challenge, considering the vast numbers of such pet foods, and the varying levels of available evidence supporting



such claims. The AVMA's concern is that veterinarians may not have all the evidence that they need, to verify that such foods do what they purport to do before recommending it for their patients.

**Therefore, in the interest of pet safety, the AVMA recommends the FDA require all pet food products with implied or explicit health or drug claims to include a prominent statement on the label, indicating that such claims have not been evaluated or verified by the FDA. Requiring such disclaimers on pet foods bearing health claims would enhance transparency and dissemination of accurate and truthful information to veterinarians, pet retailers and consumers.**

In the absence of this disclaimer, some veterinarians and the majority of consumers will continue to assume that pet food claims are, in fact, substantiated and enforced by the FDA the same as human food health claims. This misconception has far-reaching consequences, including misinformation to consumers, potential licensure liabilities to practicing veterinarians who recommend such foods, and most importantly, the health and well-being of pets.

Moreover, animals that are "treated" with foods containing drug claims, in lieu of drugs approved by the FDA for specific diseases, may not receive appropriate medical treatment in a timely manner.

## **2. Addition of calorie statements on pet food labels**

The AVMA is committed to helping promote healthful lives of pets by aggressively addressing the most common drivers of morbidity and mortality. The AVMA is particularly concerned about the obesity epidemic affecting our pet population today. An estimated 25% of dogs reportedly suffer from obesity. Studies also indicate obese cats are four to five times more likely to develop certain debilitating and/or life threatening diseases than their normal-weight counterparts.

We recognize that the human-animal bond is a strong one, and feeding pets is a part of that bonding process. As pet owners ourselves, veterinarians know firsthand how strong that tie is. However, pet owners in the general public do not always know how much to feed or realize the high calories content associated with some of the foods they feed their pets. To control obesity, we need to not only raise this awareness, but also provide easy and practical options for pet owners.

**To that end, the AVMA recommends that calorie information be required on all dog and cat foods. Specifically, it recommends that FDA require the following:**

- 1) Calorie information on all dog and cat foods. This includes foods intended for long-term feeding and supplemental treats.**
- 2) That the calorie statement be expressed both as kilocalories of metabolizable energy per kilogram of food, and as kilocalories of metabolizable energy per familiar household measure, such as cans or cups. We recommend that the label expressly and clearly differentiate whether the calorie content label information was determined by chemical analysis and calculation, or by animal feeding.**

A number of studies have graphically demonstrated that most pet owners, even those whose pets are on medically supervised diets, feed supplemental treats. Many of these treats contain high levels of calories that can render a weight loss program ineffective. Only by clearly understanding the calorie content of both the base diet and supplemental treats in user friendly terms, such as per biscuit, nugget, bone, etc., will veterinarians and pet owners be able to successfully manage obesity in pets.



To compare calorie content of different pet foods, however, there must be uniformity in the reporting of calorie information on the pet food label. The AVMA believes that the use of kilocalories of metabolizable energy per kilogram of food is the most appropriate reporting format. Likewise, it is imperative that labels include kilocalories of metabolizable energy per familiar household measure, such as cans or cups. Use of familiar household measures affords consumers an easy way to ensure they are feeding the correct amount of food to their pets.

Finally, it is important to recognize that determination of caloric content of pet foods by chemical analysis and calculation method does not yield food digestibility information, whereas the feeding method does yield these digestibility numbers. It is imperative to have digestibility information to appropriately compare two foods. Therefore, pet food labels should include both caloric information and how it was that information was derived.

### **3. Development of a formalized, multi-disciplinary emergency preparedness system utilizing the NIMS.**

Our final point is in regards to the nationwide pet food recall in 2007. While our country's food is among the safest in the world, we must do more to safeguard our nation's pets. As we become increasingly dependent on imported ingredients for the commercial manufacturer of pet foods, we must use the lessons learned from last year's pet food recall, during which time too many of our pets' lives were tragically lost.

During the pet food recall AVMA worked diligently to provide the veterinary profession and pet-owning public with timely information as it became available. However, the AVMA fully recognizes the need for, and looks forward to, the achievement of an even stronger food safety system using the National Incident Management System (NIMS), which will help prevent such tragic losses.

The AVMA asserts that the pet food recall of 2007 exemplified the need for federal agency coordination and utilization of the NIMS, which is a nationwide, comprehensive approach to incident management that is applicable across jurisdictions and functional disciplines. However, the NIMS can only effectively if it is comprehensive and is utilized by all federal agencies. Therefore, we specifically recommend the FDA utilize the NIMS in to fully coordinate its emergency preparedness activities.

Comprehensive federal development and implementation of NIMS-based strategies, with the assistance of stakeholder expertise, would address the needs for coordinated emergency response and for effective communication to support the resolution of food and feed events. As the global marketplace becomes more interconnected, federal agencies and its partners must continue to enhance the coordination of their preparedness and response activities. This is paramount for the United States food supply to remain among the safest in the world.

In addition to the above comments, the AVMA has furnished answers to the specific questions posed by FDA in its Federal Register Notice dated April 21, 2008:

#### *Pet Food Labeling*

*(1) How could the nutritional information (e.g., guaranteed analysis, nutritional adequacy statements/life-stage claims) already present on pet food labels be improved?*

No changes are recommended at this time.



*(2) How could the ingredient information already present on pet food labels (i.e., the ingredient list) be improved?*

No changes are recommended at this time.

*(3) How could the current feeding instructions/recommendations section already present on pet food labels be improved?*

It would be helpful to include a statement on pet food labels, relaying that the feeding instructions only provide a broad guideline for pet owners. The nutritional requirements vary between individual pets, the factors of which include body weight, genetics, age, breed, geographic location/climate, and normal exercise level.

*(4) Should feeding recommendations be required on the labels for all types of pet food?*

Yes. Feeding recommendations on all types of pet food (including treats) should be required, to aid animal owners in their awareness of how many calories their animals consume from their regular diets and from treats.

*(5) Should a Nutrition Facts box, similar to the format that appears on human food labels, replace the current Guaranteed Analysis that currently appears on pet food labels? If so, how could this Nutrition Facts box be made to clearly distinguish it from human food labeling?*

No added benefit to pet owners is anticipated from such a labeling change. However, nutritional information should be clearly marked and separated from other text on label.

*(6) What other information should be required on pet food labels that is not generally present on pet food products sold in the United States?*

The AVMA recommends that calorie information be required on all dog and cat foods. Specifically, asserts that calorie information should be required on all dog and cat foods, including foods intended for long-term feeding and supplemental treats.

In addition, the AVMA contends that such a calorie statement should be expressed both as kilocalories of metabolizable energy per kilogram of food, and as kilocalories of metabolizable energy per familiar household measure, such as cans or cups. The label should expressly and clearly differentiate whether the calorie content label information was determined by chemical analysis and calculation or by animal feeding.

*(7) Are there existing state laws, regulations, guidelines, or other models that FDA should consider when drafting the proposed pet food labeling?*

The AVMA recommends the use of the current Association of American Feed Control Officials (AAFCO) Model Regulations for Pet Food and Specialty Pet Food as a starting point for drafting the proposed pet food labeling regulations.

The AVMA applauds the FDA for its continued leadership to protect public health through ensuring safe drugs and foods for people and feeds for animals. The FDA is to be commended on



its scientific and risk-based approaches, and on its engagement with stakeholders and the general public on these issues, which are so important for the health of Americans and their animals.

The AVMA appreciates the opportunity to share its thoughts on the matter of pet food labeling standards. For additional information and/or explanation of AVMA's comments, feel free to contact Dr. Lynne White-Shim (800-248-2862 ext. 6784 or [lwhite@avma.org](mailto:lwhite@avma.org)).

Respectfully,



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