

Proposed Regulations for Dietary Starch and Sugars Guarantees and Descriptive Terms

Attachment E: The PFC recommends and moves the following addition and revisions to AAFCO Model Regulation PF4(a) on p. 139 of the 2017 Official Publication (OP) to the Model Bill and Regulations Committee for their consideration.

Regulation PF4. Expression of Guarantees

- (a) The “Guaranteed Analysis” shall be listed in the following order and format unless otherwise specified in these Regulations:
 - (1) ...
 - (2) ...
 - (3) When listed on the label of a dog or cat food product, guarantees for dietary starch and sugars shall be stated as maximum percentages. Neither guarantee shall be listed without the other. The guarantee for dietary starch shall follow ash, if also listed; or moisture, if ash is not listed. The guarantee for sugars shall follow dietary starch.
 - ~~(3)~~(4) A dog or cat food label shall list other required or voluntary guarantees...
 - ~~(4)~~(5) A specialty pet food label shall list other required or voluntary guarantees...

Attachment F: The PFC recommends and moves the following additions to AAFCO Model Regulation PF10 on p. 147 of the 2017 OP to the Model Bill and Regulations Committee for their consideration.

Regulation PF10. Descriptive Terms

- (a) Calorie Terms...
- (b) Fat Terms...
- (c) Carbohydrate Terms
 - (1) “Low” Carbohydrate, Dietary Starch and Sugars Claims
A claim of “low carbohydrates”, “low dietary starch”, “low sugars” or a combination thereof is not allowed.
 - (2) “Less” or “Reduced” Carbohydrates, Dietary Starch and Sugars claims.
 - A. A dog or cat food product which bears on its label a claim of “less _____” or “reduced _____” (blank is to be completed by using “carbohydrates”, “dietary starch” or “sugars”) or words of similar designation, shall include on the label:
 - i. The name of the product of comparison and the percentage of reduction in total dietary starch plus sugars (expressed on an equal weight basis) explicitly stated and juxtaposed with the largest or most prominent use of the claim on each panel of the label on which the term appears; and
 - ii. The comparative statement printed in type of the same color and style and not less than one-half the size used in the claim; and
 - iii. Maximum guarantees for dietary starch and sugars as stated in Model Regulation PF4(a)(3).
 - B. A comparison between products in different categories of moisture content (i.e., less than 20%, 20% or more but less than 65%, 65% or more) is misleading.