

Model Bills and Regulations Committee

Attachment for January 21, 2019 Meeting

Attachment C

Proposed Revision to PF4 – Expression of Guarantees

There has been some confusion about use of a heading in the Guaranteed Analysis. While most labels do use the words “Guaranteed Analysis” as the heading, some companies have expressed that the regulations do not clearly state the requirement for the heading. In order to clarify the need for the use of the heading, the following change to PF4(a) is being proposed:

Regulation PF4. Expression of Guarantees

- (a) The “Guaranteed Analysis” shall be listed **under the heading “Guaranteed Analysis”** in the following order and format unless otherwise specified in these Regulations:
 - (1) A pet food or specialty pet food label shall list the following required guarantees;
 - A. Minimum percentage of crude protein;
 - B. Minimum percentage of crude fat;
 - C. Maximum percentage of crude fat, if required by Regulation PF10;
 - D. Maximum percentage of crude fiber;
 - E. Maximum percentage of moisture; and
 - F. Additional guarantees shall follow moisture.....

Proposed Revision to PF9 – Statements of Calorie Content

There has been some confusion on the part of both regulators and industry about the requirement of “...in terms of metabolizable energy (ME)...” to be included in the calorie content statement. The energy of a food can be expressed in several ways: gross energy, digestible energy and metabolizable energy. The Model Pet Food & Specialty Pet Food Regulations state in PF9(a)(2) that the calorie content statement on pet food labels must be in terms of metabolizable energy. However, the wording in the regulation is not a clear enough communication of the requirement. The proposed language change is intended to clarify the regulation and lessen the confusion on the part of both the regulator and the regulated industry.

Regulation PF9. Statements of Calorie Content

- (a) The label of a dog or cat food, including snacks, treats, and supplements, shall bear a statement of calorie content and meet all of the following:
 - (1) The statement shall be separate and distinct from the “Guaranteed Analysis” and appear under the heading “Calorie Content”;
 - (2) The statement shall be measured in terms of metabolizable energy (ME) on an “as fed” basis and must be expressed, **including either the words ‘metabolizable energy’ or the abbreviation ‘ME,’** both as “kilocalories per kilogram” (“kcal/kg”) of product, and as kilocalories per familiar household measure (e.g., cans or cups) or unit of product (e.g., treats or pieces); and
 - (3) The calorie content is determined by one of the following methods: