



Proposed Revision to PF3 (ATTACHMENT D)

Pet Food Committee Recommendation:

The PFC recommends that the following revisions be considered by the MBRC for integration into the AAFCO Official Publication.

Background

Methods used to calculate the ingredient inclusion rates for percentage claims on pet food labels has become inconsistent and possibly misleading to the consumer. This workgroup was formed to review current regulations and provide recommendations to the committee.

Workgroup Recommendations:

Regulation PF3. Brand and Product Names

- (a) The names of the ingredient(s) used in the brand or product name or elsewhere on the product label shall appear in order of predominance by weight in the product. Names of flavors due to their varying intensity can be in any order.
- (b) The words "100%," or "All," or words of similar designation shall not be used in the brand or product name of a pet food or specialty pet food if the product contains more than one ingredient. ~~, not including water sufficient for processing, decharacterizing agents, or trace amounts of preservatives and condiments.~~
- (c) An ingredient or combination of ingredients may form part of a brand or product name of a pet food or specialty pet food:
 - (1) When the named ingredient(s) constitutes at least 95% of the total weight of the product. Water sufficient for processing may be excluded when calculating the percentage; however, the named ingredients shall constitute at least 70% of the total product weight.
 - (2) When any named ingredient(s) constitutes at least 25% of the total weight of the product, provided that:
 - A. Water sufficient for processing may be excluded when calculating the percentage, however, the named ingredients(s) shall constitute at least 10% of the total product weight; and
 - B. A descriptor is used with the ingredient name(s). This descriptor shall imply other ingredients are included in the product formula.
Examples of descriptors include "dinner," "platter," "entree," "formula," and "recipe"; and
 - C. The descriptor shall be in the same size, style and color print as the ingredient names(s)
 - (3) When a combination of ingredients which are included in the brand or product name in accordance with Regulation PF3(c) provided that: meets all of the following:

- A. Each named ingredient constitutes at least 3% of the total weight of the product ~~the product weight~~, excluding water sufficient for processing; and
 - ~~B. The names of the ingredients appear in the order of their respective predominance by weight in the product; and~~
 - B. All such ingredient names appear on the label in the same print size, font style and color print.
- (d) When the name of any ingredient appears in the brand or product name of a pet food or specialty pet food or elsewhere on the product label and includes a descriptor such as "with" or similar designation, the named ingredient(s) must each constitute at least 3% of the product weight exclusive of water sufficient for processing. ~~If the names of more than one ingredient are shown, they shall appear in their respective order of predominance by weight in the product.~~

The 3% minimum level shall not apply to claims for nutrients, such as, but not limited to, vitamins, minerals, and fatty acids, as well as condiments. The word "with," or similar designation, and named ingredients shall be in the same size, style, color and case print and be of no greater size than:

Panel Size	Max "With Claim" Type Size
≤5 in. ²	1/8 in.
>5–≤25 in. ²	1/4 in.
>25–≤100 in. ²	3/8 in.
>100–≤400 in. ²	1/2 in.
>400 in. ²	1 in.

- (e) A flavor designation may be included as part of the product name or elsewhere on the label of a pet food or specialty pet food when the flavor designation meets all of the following:
 - (1) The flavor designation:
 - A. Conforms to the name of the ingredient as listed in the ingredient statement; or
 - B. Is identified by the source of the flavor in the ingredient statement; and
 - (2) The word "flavor" is printed in the same size type and with an equal degree of conspicuousness as the name of the flavor designation; and
 - (3) Substantiation of the flavor designation, the flavor claim, or the ingredient source is provided upon request.
- (f) Contractions or coined names referring to ingredients shall not be used in the brand name of a pet food or specialty pet food unless it is in compliance with Regulation PF3 (b), (c), or (d).
- (g) When pet food or specialty pet food consists of raw milk, the words, "Raw (blank) Milk" shall appear conspicuously on the principal display panel. (Blank is to be completed by using the species of animal from which the raw milk is collected.)