

Handling and Storage Instructions Webinar Questions/Comments from 3/25/21

General feedback and questions:

An addition should be made to section (b) of this draft:

Extruded, baked, retorted or cooked or otherwise treated to prevent pathogens pet food products may have a section and, if present, shall be titled "Handling and Storage Instructions"

Comment: Revised in Draft Model Regs

Section (a) of the draft regulation refers to "non-heat treated (raw)" products. There may be some confusion which results from the use of this term. In addition, a revision to this term may allow for greater inclusion of possible future product innovations. For this reason, the term "non-heat treated (raw)" should be replaced with "raw products not processed to prevent pathogens."

Comment: This has been re-vised.

AAFCO to consider whether trademarking these graphics is possible.

These handling instructions graphics from the AAFCO website must be available as hi-resolution images, as previously mentioned. We ask that AAFCO confirm this plan with stakeholders.

Comment: This will be discussed in the Implementation WG

The handling graphics, if used, may need to be printed on very small packages (3.5 or 5.5 oz cans or trays, for example). Unsure whether the graphical representation would even be readable in the ½ inch size. If it is unreadable then the graphic has no utility to the consumer. Consider exemptions for very small packages.

Comment: The type and size of font was updated.

Companies have begun working with their designers to create mock labels which follow the requirements of the draft regulations. An early indication from this effort shows that there may be small packages wherein the current draft requirements would not allow the new graphics to physically fit onto the package. Have the working group to further explore this concern. This comment refers to all sections of the draft proposals that include graphical requirements to the label and further reinforces the recommendation that the working groups consider exceptions for small packages.

Section (d) of the draft Handling and Storage Instructions regulation includes expectations that the header and handling instructions will be separated by two type points and also makes minimum size requirements for the type size. There will not be enough room to accommodate this on small packages. Consider exemptions for very small packages.

Comment: This has been revised in the draft model regulations.

The CFR requirements are federally mandated whereas these AAFCO requirements would be adopted by states. Therefore, only those graphics and language which are federally mandated need to be translated into the alternative language. No translation of these AAFCO (i.e. state) requirements should be required or enforced. Only those items in which translation is required from the CFR should be enforced on the label.

Comment: It is recommended this is reviewed by the Implementation WG.

During the March 25 webinar that was held by the Pet Food Committee, it was indicated that the Handling and Storage graphics could appear in a black and white color scheme. The draft regulatory language should be updated to express this possibility.

Comment: An option of black and white will be available.

Line 16 – Will specific pantone colors be provided? Will need a black and white option if specialty pet products are included.

Comment: previously addressed

The non-heat-treated (raw) language needs to be revisited to include language for a mitigation process, that could be verified upon request by state regulators.

Comment: previously addressed

What section would address the freeze dried and kibble plus freeze dried products? This language does not allow for innovative products.

Comment: statement was revised.

“Keep out of reach from children”. Should be changed to “Keep out of reach of children.”

Comment: statement was revised.