

- Line 6 – What is the purpose of requiring the addition of a graphic representation of the nutritional adequacy on dog and cat foods? Did this stand out in consumer research? This change will require major effort from industry to implement.

The charge of this work group was to come up with nutritional graphics for the front of the package that would be noticeable for the consumers because the current nutritional adequacy statement is buried on the back of packages.

- Line 27 – Is the color palette limited to black and white? How do we handle the required logos with respect to multi-lingual packaging? Will the logos be trademarked? Will there be language options?

The color palette is only black and white. This was discussed in the workgroup as the best option. A graphic designer helped with this idea and there is an option of black on white or white on black for the purpose of different packaging colors. The multi-lingual and trademark question are being discussed in the Implementation Workgroup currently.

- How do we manage translations of the graphic representations? Must the same format be repeated?

The workgroup recommends that the Implementation workgroup consider these suggestions.

- The intent of “Attachment B” is to “provide a graphic representation of the nutritional adequacy or purpose of the product.” What is the expectation for foods that are recommended by veterinarians but are also “complete & balanced?” By only displaying the octagon, it takes away the actual nutritional adequacy (and intent of the graphic) of that product. Are these products expected to have both a “complete & balanced” graphic as well as the “Feed Under Veterinary Supervision Only?” It should be possible to match the graphic with the AAFCO/nutritional adequacy statement found on the tech panel.

It should only have one graphic to state the nutritional purpose. If it is a “Feed Under Veterinary Supervision Only” then the Vet will recommend the feeding directions even if it is a complete and balanced product. By displaying the octagon graphic, that is letting the consumer know that the product is only available under the order of a veterinarian.

- For foods that are “Feed Under Veterinary Supervision Only” and are not complete and balanced, will they have to carry the “Treat/Snack/Food Supplement” as well?

If it is a “Feed Under Veterinary Supervision Only” then the Vet will recommend the feeding directions even if it is not complete and balanced.

- Missing complete and balanced adult (all size dogs)

The workgroup felt that all necessary graphics for Nutritional Adequacy were available.

- For treats w/ veterinary attributes: “Complementary” feeding would be a better description. And should they be labeled as “Treat: or “Feed Under Vet Supervision” or both?

The AAFCO guidelines for therapeutic diet claims stipulate that the product provides most or all of the pets daily nutritional needs. A treat would not qualify as a therapeutic diet and therefore would not be labeled as “Feed Under Veterinary Supervision.”

- For consistency, the feline graphics should indicate “cats” as the canine icons indicate “dogs.” Since the label is already stating the intended species the extra verbiage for the graphic representation would be unnecessary. The graphics for dogs indicates ‘dogs’ because of the additional requirements in the nutritional adequacy statements for dog products.

- Attachment B, PF7: Is it possible to create a graphic representation sans verbiage for these? Or at least reduce the amount of verbiage on the graphics via icons/images? The verbiage will be difficult to read on packages, and the font/graphic will have to be a lot larger than the minimum required to be legible as well as meet printer specifications. Has AAFCO/PFC done any print testing for this?

The workgroup understands that the graphic representations on the small packages are challenging. The workgroup did work with graphic designers to assist with the font choices which are: Myriad Bold (complete and balanced) and Nexa Rust Sans Black. The graphics representations of different sizes were tested on several different size packages to determine the most appropriate size for the best legibility. The workgroup

did review multiple actual label mock-ups with the graphic representations included and adjusted the size of the representations, as needed.

- Consider whether Attachment B “products intended for use by, or under the supervision or direction of a veterinarian” should be included as part of Nutritional Adequacy Graphic PF7.

The goal of the graphic representation is to rapidly communicate the nutritional adequacy and hence appropriateness of the product for the consumers’ animals. The workgroup determined that indications for use as directed by a veterinarian was of such importance that it needed to be communicated to the consumer in separate and distinctive nutritional adequacy representation on the PDP.