

APPENDIX B

**AAFCO Pet Food and Specialty Pet Food Model Regulations Label Review Checklist**

**Company Name:** \_\_\_\_\_

**Product Name:** \_\_\_\_\_

**Reviewer:** \_\_\_\_\_

***This Label Review Checklist is intended as a guide in determining whether this pet food or specialty pet food label is in compliance with the AAFCO Model Regulations for Pet Food and Specialty Pet Food.***

***\*Note: There are also federal regulations that apply to the labeling and manufacture of animal food. It is recommended that pet food manufacturers and distributors check with FDA for additional information on federal labeling requirements. The AAFCO Business of Pet Food Website has a page with links to additional information on federal labeling requirements as well. The website address is <http://petfood.aaftco.org>***

***A “Yes” response to the questions below indicates compliance for that item.***

***A “No” response indicates a violation of the model regulation mentioned.***

***I. Animal Species – Model Pet Food Regulation PF2(a)(2)***

- 1) Do the words “Dog Food,” “Cat Food,” “Canine Formula,” “Feline Diet,” “Hamster Food” or similar designation appear conspicuously on the principal display panel?  
Yes \_\_\_\_\_ No \_\_\_\_\_

***II. Quantity Statement – Model Pet Food Regulation PF2(a)(3)***

- 1) Is there a quantity statement on the principal display panel in either net weight or net volume (avoirdupois and metric) or by count? Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) If volume is listed on a liquid vitamin or mineral supplement, is there a weight equivalent listed elsewhere on label? PF4(c)(4) and PF4(d)(4)  
Yes \_\_\_\_\_ No \_\_\_\_\_

***III. Location of Required Label Information – Model Pet Food Regulation PF2(b)***

- 1) Does all required label information appear on the outer container or wrapper?  
Yes \_\_\_\_\_ No \_\_\_\_\_

***IV. Product Claims - Model Pet Food Regulation PF2(c)(d)(e)(f)(g)***

If product claims and/or graphic representations are made:

- 1) Does adequate substantiation exist for each claim? Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) Are the claims truthful and not misleading? Yes \_\_\_\_\_ No \_\_\_\_\_
- 3) If a claim of “new” or “improved” is made, is it limited to six (6) months of production? Yes \_\_\_\_\_ No \_\_\_\_\_

**V. Product Comparison Claims – Model Pet Food Regulation PF2(h)**

- 1) If the label includes any claims of comparison to another product, is the name of the product of comparison included on the label?  
Yes \_\_\_\_\_ No \_\_\_\_\_
  - a. If “yes”, is documentation, data, etc., available to support the claim?  
Yes \_\_\_\_\_ No \_\_\_\_\_
  - b. Is the claim limited to one (1) year production?  
Yes \_\_\_\_\_ No \_\_\_\_\_

**VI. Product Name – Model Pet Food Regulation PF3:**

The following AAFCO Official Pet Food or Specialty Pet Food Regulations refer to ingredient(s) that form part of the product name:

- 1) If the pet food or specialty pet food claims “100%” or “All” within the product name (PF3(a)):
  - a. Does the pet food or specialty pet food contain only one ingredient other than water for processing, decharacterizing agents, or trace amounts of preservatives and condiments? Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) If the product name is formed by using an ingredient or combination of ingredients without further qualification (“95% Rule”- PF3(b)(1) Example: My Favorite Beef Dog Food):
  - a. Is the formulation comprised of at least 95% of the named ingredient(s), exclusive of water sufficient for processing, [but not less than 70% of the total product weight] in the formulation?  
Yes \_\_\_\_\_ No \_\_\_\_\_
  - b. Is the named ingredient listed in the ingredient statement?  
Yes \_\_\_\_\_ No \_\_\_\_\_
  - c. If multiple ingredients are listed, are they in the same order in both the product name and ingredient statement and is each ingredient at least 3%

of formula?  
Yes \_\_\_\_\_ No \_\_\_\_\_

d. Are all the ingredients that are included in the product name printed in the same size, style and color print? Yes \_\_\_\_\_ No \_\_\_\_\_

3) If a product name is formed using an ingredient or a combination of ingredients and is listed with a primary descriptor term such as “dinner,” “entrée,” “formula,” etc. (“25% Rule”- PF3(b)(2), Example: My Favorite Salmon Entrée Cat Food):

a. Is the formulation comprised of at least 25% of the named ingredient(s), exclusive of water sufficient for processing, [but not less than 10% of the total product weight] in the formulation?  
Yes \_\_\_\_\_ No \_\_\_\_\_

b. Is the named ingredient listed in the ingredient statement?  
Yes \_\_\_\_\_ No \_\_\_\_\_

c. If multiple ingredients are listed, are they in the same order in both the product name and ingredient statement and is each ingredient at least 3% of the formula? (Example: My Favorite Beef, Chicken and Lamb Dinner Dog Food)?  
Yes \_\_\_\_\_ No \_\_\_\_\_

d. Are all ingredients and primary descriptor that are included in the product name printed in the same size, style and color print? Yes \_\_\_\_\_ No \_\_\_\_\_

4) If there is an ingredient name in the product name or elsewhere on the label that includes a descriptor term such as “with” (“With Rule”- PF3(c)  
Example: My Favorite Dog Food With Beef):

a. Does each ingredient named constitute at least 3% of the formulation, exclusive of water sufficient for processing (except for nutrients or condiments)? Yes \_\_\_\_\_ No \_\_\_\_\_

b. If multiple ingredients are listed, are they in the same order in both the product name and ingredient statement and is each ingredient at least 3% of formula? Yes \_\_\_\_\_ No \_\_\_\_\_

c. Is the word “with” in the same size, style, color and case print as the ingredients that are included in the product name?  
Yes \_\_\_\_\_ No \_\_\_\_\_

d. Does the product name meet the print size specifications listed in the following table?  
Yes \_\_\_\_\_ No \_\_\_\_\_

Panel Size	Maximum "with" Claim Type Size
≤5 sq. in.	1/8"
>5- ≤25 sq. in.	1/4"
>25- ≤100 sq. in.	3/8"
>100- ≤400 sq. in.	1/2"
> 400 sq. in. +	1"

5) If a flavor designation is used in the product name or elsewhere on the label, does the name correspond to the source of the flavor in the ingredient statement or has it been identified by a source of flavor in the ingredient statement; and is substantiation available to validate the flavor designation? Yes \_\_\_\_\_ No \_\_\_\_\_

a. If a flavor designation is made, is the word "flavor" printed in the same size type and with an equal degree of conspicuousness as the name of the flavor designation? Yes \_\_\_\_\_ No \_\_\_\_\_

Table Summarizing Product Name Requirements			
Claim Rule:	Product Name Example With Ingredient	Percentage of Ingredient to Make Claim	Minimum Percent of Ingredient in Formula Weight***
"100%"; "All"	"100% Beef", "All Sweet Potato"	100%*	
95%	"Cherry"; "Trout"	95%**	70%
25% Descriptor	"Chicken Platter"; "Turkey Recipe"	25%**	10%
"with"	"with blueberries, carrots, and cranberries"	3% Each **	N/A
"Flavor"	Peanut Butter Flavor	Sufficient to Impart Flavor	N/A

\*not including water sufficient for processing, decharacterizing agents, or trace amounts of preservatives and condiments

\*\*not including water sufficient for processing

\*\*\*Minimum percentage of ingredient allowed in total product weight, regardless of water content.

## VII. Expression of Guarantees - Model Pet Food Regulation PF4

1) Are all required nutrients guaranteed? PF4(a)(1); PF4(g) Yes \_\_\_\_\_ No \_\_\_\_\_

a. Are mandatory guarantees in the proper order as found in PF4(a)(1)?  
Yes \_\_\_\_\_ No \_\_\_\_\_

- b. If label claims have been made that indicate that the product is a source of specific nutrients, are those nutrients guaranteed? Model Bill Section 5(a)(3)  
Yes \_\_\_\_\_ No \_\_\_\_\_

2) Do the guarantees follow the applicable AAFCO nutrient profile order?  
PF(4)(a)(3) Yes \_\_\_\_\_ No \_\_\_\_\_

- a. For Specialty Pets without an AAFCO-recognized nutrient profile, do the guarantees follow the order of the AAFCO Cat Food Nutrient Profile?

PF(4)(a)(4)  
Yes \_\_\_\_\_ No \_\_\_\_\_

3) If a guarantee is made for a nutrient not listed as essential by the AAFCO Dog or Cat Food Nutrient Profiles (or in the case of a specialty pet food, the cited AAFCO-recognized nutritional authority for the intended species), is it asterisked to the disclaimer statement? PF4(a)(3) or PF4(a)(4).

Yes \_\_\_\_\_ No \_\_\_\_\_

4) Are the correct units used? Units must follow those used in AAFCO Dog or Cat Food Nutrient Profiles (or in the case of specialty pet food, in the cited AAFCO-recognized nutrient profile\*). PF4(a)(3) or PF4(a)(4) Yes \_\_\_\_\_ No \_\_\_\_\_

*\*Note: If no AAFCO-recognized nutrient profile exists for the species, units should follow the AAFCO Cat Food Nutrient Profile for specialty pet food labels.*

5) Has it been verified that the label does not have sliding scale guarantees? (e.g. Minimum Crude Protein is 15-18%) PF4(b) Yes \_\_\_\_\_ No \_\_\_\_\_

6) If formulated or represented as a mineral supplement, are guarantees listed as required by PF4(c) (1)-(4)? Yes \_\_\_\_\_ No \_\_\_\_\_

7) If formulated or represented as a vitamin supplement, are guarantees listed as required by PF4(d)(1)-(4)? Yes \_\_\_\_\_ No \_\_\_\_\_

8) If the label of the pet food or specialty pet food bears a statement of comparison of the nutrient content of food with levels established in the the AAFCO-recognized nutrient profile, do the following apply? PF4(e)

- a. Does the product meet the nutrient requirements of the AAFCO-recognized nutrient profile?

Yes \_\_\_\_\_ No \_\_\_\_\_

- b. Is there a statement that the product meets the AAFCO-recognized nutrient profile, unless the nutritional adequacy statement required by PF7(a)(1) or PF7(b)(2)(A) appears elsewhere on the label?

Yes \_\_\_\_\_ No \_\_\_\_\_

- c. Does the comparison comply with the additional requirements in

PF4(e)(3)-(4)?  
Yes \_\_\_\_\_ No \_\_\_\_\_

- 9) Has it been verified that the moisture content of the pet food or specialty pet food does not exceed 78% or the natural moisture content of the ingredients, unless the product is consisted of and labeled as: “stew,” “gravy,” “sauce,” “broth,” “aspic,” “juice,” or a “milk replacer”? PF4(f)  
Yes \_\_\_\_\_ No \_\_\_\_\_

**VIII. Ingredient Statement – Model Pet Food Regulation PF5**

- 1) Are all ingredients listed in the same size, style, and color and in a single, uninterrupted ingredient statement? Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) Are ingredients listed in order of descending predominance by weight?  
PF5(a)(2) Yes \_\_\_\_\_ No \_\_\_\_\_
- 3) Are defined ingredients listed by their AAFCO defined names? PF5(a)(3)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 4) If an ingredient has no established AAFCO name or definition, is a common or usual name used? PF5(a)(4) Yes \_\_\_\_\_ No \_\_\_\_\_
- 5) Collective terms, brand or trade names have not been used in the ingredient statement? PF5(c) Yes \_\_\_\_\_ No \_\_\_\_\_
- 6) There are no references to ingredient quality or grade in the ingredient statement? PF5(d)(3) Yes \_\_\_\_\_ No \_\_\_\_\_

**IX. Drugs and Pet Food Additives - Model Pet Food Regulation PF6**

- 1) If an artificial color is used, has sufficient documentation been collected to demonstrate that it has been shown to be harmless to pets or specialty pets based on the intended use of the feed? PF6(a) Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) If an additive or drug is being used, can safety and efficacy be established through satisfactory evidence (i.e. does it conform to the requirements of the applicable regulation in the Code of Federal Regulations, Title 21, or is it prior-sanctioned, informal-review sanctioned or GRAS for such use) when the product is fed according to the label directions? PF6(b) Yes \_\_\_\_\_ No \_\_\_\_\_
- 3) If a drug is used: PF6(b)(2) and MR3(2)  
a. Does the word “Medicated” appear directly following and below the product name in font that is no less than one half (1/2) the type size of the product name? MR3(2)  
Yes \_\_\_\_\_ No \_\_\_\_\_

- b. Does the label bear a purpose statement that clearly indicates the purpose, class of animal, and species? MR3(2)II  
Yes \_\_\_\_\_ No \_\_\_\_\_
- c. Does the label have a claim statement (purpose of the medication)?  
MR3(2) Yes \_\_\_\_\_ No \_\_\_\_\_
- d. Does the label have an active ingredient statement which lists the active drug ingredient by the established name and the amount present?  
MR3(2)IV Yes \_\_\_\_\_ No \_\_\_\_\_

**X. Nutritional Adequacy – Model Pet Food Regulation PF7**

Dog and Cat and Specialty Pets

- 1) If there is an unqualified nutritional adequacy claim of “complete and balanced,” “perfect,” “scientific,” or “100% nutritious” on the label of the pet food or specialty pet food, is the product complete and balanced for all life stages of the intended species by meeting one of the 3 criteria in PF7(a)?  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) If there is a qualified nutritional adequacy claim for only a limited purpose or specific life stage on the label of the pet food or specialty pet food, is the claim and required qualification on same panel in the same size, style and color print? PF7(b)(1) Yes \_\_\_\_\_ No \_\_\_\_\_
- 3) If there is a qualified nutritional adequacy claim for only a limited purpose or specific life stage on the label of the pet food or specialty pet food, is the product “complete and balanced,” “perfect,” “scientific,” or “100% nutritious” for the specific life stage of the intended species by meeting one of the 3 criteria in PF7(b)(2)?  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 4) If the pet food or specialty pet food product is labeled for “use by or under the supervision or direction of a veterinarian,” (PF7(d)) does it also contain a nutritional adequacy statement in accordance with PF7(c)(1) or PF7(c)(3)? PF7(d)? Yes \_\_\_\_\_ No \_\_\_\_\_
- 5) Are signed affidavits available to support that the pet food or specialty pet food product meets the requirements of PF7(a) or PF7(b)(2)? PF7(e)  
Yes \_\_\_\_\_ No \_\_\_\_\_

Pet (Dog and Cat) Only:

- 6) If the dog or cat food product is a “snack,” “treat,” or “supplement,” do the words

“snack” or “treat” or “supplement” appear clearly and conspicuously on the principal display panel? PF7(c)

Yes \_\_\_\_\_ No \_\_\_\_\_

7) If the dog or cat food product is not labeled as a “snack” or “treat” or “supplement”:

a. Does the label contain the proper (as appropriate to the intended use and substantiation method) nutritional adequacy statement and in the exact wording shown? PF7(c)(1)

Yes \_\_\_\_\_ No \_\_\_\_\_

b. And, if the product does not meet the requirements of Regulation PF7(a) or (b)(2) or any other special nutritional or dietary need, so is suitable only for limited or supplemental feeding, does the statement “This product is intended for intermittent or supplemental feeding only” appear on the label? PF7(c)(3) Yes \_\_\_\_\_ No \_\_\_\_\_

#### **XI. Feeding Directions – Model Pet Food Regulation PF8**

Pet (Dog or Cat) Food Directions:

1) If dog or cat food (including “treats” or “snacks”)\* is labeled as complete and balanced for any or all life stages, does the label have feeding directions?

PF8(a) Yes \_\_\_\_\_ No \_\_\_\_\_

*\*If a dog or cat product is labeled as a snack or treat, and is not represented as “complete and balanced”, feeding directions are voluntary unless considered necessary for “safe and effective use”.*

2) Are the feeding directions consistent with all of the intended uses of the product?

PF8(a) Yes \_\_\_\_\_ No \_\_\_\_\_

3) Do the feeding directions state, at minimum, a weight or unit of product per weight of dog or cat and frequency of feeding stated? PF8(a)

Yes \_\_\_\_\_ No \_\_\_\_\_

4) If the dog or cat food product is labeled for “use by or under the supervision or direction of a veterinarian,” does it also carry the statement “Use only as directed by your veterinarian.”? PF8(b) Yes \_\_\_\_\_ No \_\_\_\_\_

Specialty Pet Food Directions:

5) Are the feeding directions adequate to meet the nutritional requirements of the intended species as recommended by the AAFCO-recognized nutritional authority? PF8(c) Yes \_\_\_\_\_ No \_\_\_\_\_

6) Do the feeding directions for specialty pet foods and treats labeled as complete



and balanced for any or all life stages meet all three of the following three criteria? PF(8)(c):

- a. List feeding directions that are adequate to provide the nutrient requirements as determined by an AAFCO-recognized nutritional authority of the intended species? Yes \_\_\_\_\_ No \_\_\_\_\_
- b. Use common terms and appear predominantly on the label? Yes \_\_\_\_\_ No \_\_\_\_\_
- c. Specify the frequency of feeding? Yes \_\_\_\_\_ No \_\_\_\_\_

Nutritional Supplement Feed:

- 7) If a pet food or specialty pet food is labeled as a nutritional supplement, are adequate directions for use provided? MR 7(c)  
Yes \_\_\_\_\_ No \_\_\_\_\_

***XII. Calorie Content – Model Pet Food Regulation PF9 -Applies Only to Pet Food (Dog or Cat)***

- 1) Does the label bear a calorie content statement? PF9(a)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) Is it separate and distinct from the guaranteed analysis? PF9(a)(1)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 3) Does it appear under the heading “Calorie Content”? PF9(a)(1)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 4) Is it stated in terms of metabolizable energy (ME)? PF9(a)(2)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 5) Is it expressed both in terms of kcal/kg and kcal per familiar household measure or unit of product (cups, cans, treats, pieces)? PF9(a)(2)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 6) Has it been determined by calculation or animal testing procedure following methods in PF9(a)(3)? Yes \_\_\_\_\_ No \_\_\_\_\_
  - a. If calculated, does the word “calculated” appear in parentheses immediately after “Calorie Content”? PF9(a)(5)A.  
Yes \_\_\_\_\_ No \_\_\_\_\_
  - b. If determined by animal testing procedures, does the word “fed” appear in parentheses immediately after “Calorie Content”? PF9(a)(5)B.

Yes \_\_\_ No \_\_\_

- 7) Is an affidavit available to support the calorie content statement? PF9(a)(4)  
Yes \_\_\_ No \_\_\_

**XIII. Descriptive Terms – Model Pet Food Regulation PF10 – Applies only to Pet Food (Dog or Cat)**

- 1) Calorie Terms- Light-If the product label bears a “light,” “lite” or “low calorie” claim:

- a. Does it meet the following requirements?  
Yes \_\_\_ No \_\_\_

Light - PF10(a)(1)(A) - Dog Food

≤3100 kcal/kg	<20% moisture
≤2500 kcal/kg	<65% and ≥20% moisture
≤900 kcal/kg	≥65% moisture

Light - PF10(a)(1)(B) - Cat Food

≤3250 kcal/kg	<20% moisture
≤2650 kcal/kg	<65% and ≥20% moisture
≤950 kcal/kg	≥65% moisture

- b. Does the label contain a calorie content statement? PF10(a)(1)(A)(ii) or PF10(a)(1)(B)(ii)  
Yes \_\_\_ No \_\_\_
- c. Is the claim based on an “as fed” basis? Yes \_\_\_ No \_\_\_
- d. Does the calorie content statement follow the format specified in PF9? PF10(a)(1)(A)(ii)(aa) or PF10(a)(1)(B)(ii)(aa)  
Yes \_\_\_ No \_\_\_
- e. Are feeding directions consistent with reduced calorie intake? PF10(a)(1)(A)(iii) or PF10(a)(1)(B)(iii). Yes \_\_\_ No \_\_\_
- 2) Less or Reduced Calories - Regulation PF10(a)(2) --If the label makes a less or reduced calorie claim:
- a. Is there a product of comparison named? PF10(a)(2)(A)(i)  
Yes \_\_\_ No \_\_\_
- b. Is there a percentage of calorie reduction stated on the label?

PF10(a)(2)(A)(i)  
Yes \_\_\_\_\_ No \_\_\_\_\_

- c. Is it expressed on an equal weight basis (i.e., kcal/kg on an as fed basis)?

PF10(a)(2)(A)(i)  
Yes \_\_\_\_\_ No \_\_\_\_\_

- d. Is percent calorie reduction and name of the product of comparison juxtaposed with the most prominent use of this claim on each panel?

PF10(a)(2)(A)(i)  
Yes \_\_\_\_\_ No \_\_\_\_\_

- e. Is print of comparative statement in same color and style and at least 1/2 the type size of the claim? PF10(a)(2)(A)(ii) Yes \_\_\_\_\_ No \_\_\_\_\_

- f. Is there a calorie content statement on the label? PF10(a)(2)(A)(iii)

Yes \_\_\_\_\_ No \_\_\_\_\_

- g. Do feeding directions reflect a reduction in calories? PF10(a)(2)(A)(iv)

Yes \_\_\_\_\_ No \_\_\_\_\_

- h. Are compared products in the same moisture category (e.g., both products must be less than 20% moisture)? PF10(a)(2)(B)

Yes \_\_\_\_\_ No \_\_\_\_\_

- 3) Fat Terms - Lean - Regulation PF10(b)(1)--If there is a lean or low-fat claim on label:

- a. Does it meet the following requirements?

Yes \_\_\_\_\_ No \_\_\_\_\_

Lean – PF10(b)(1)(A) - Dog Food:

≤9% fat	<20% moisture
≤7% fat	<65% and ≥20% moisture
≤4% fat	≥65% moisture

Lean – PF10(b)(1)(B) - Cat Food:

≤10% fat	<20% moisture
≤8% fat	<65% and ≥20% moisture
≤5% fat	≥65% moisture

- b. Are there minimum and maximum percent crude fat guarantee?

PF10(b)(1)(A)(ii)(aa) or PF10(b)(1)(B)(ii)(aa)

Yes \_\_\_\_\_ No \_\_\_\_\_

4) Less or Reduced Fat - PF10(b)(2)(A)--If there is a reduced fat, less fat or similar claim on label:

- a. Is a product of comparison stated? PF10(b)(2)(A)(i) Yes \_\_\_\_\_ No \_\_\_\_\_
- b. Is there a percentage of reduction based on an equal weight basis (as fed and not dry matter basis) stated? PF10(b)(2)(A)(i) Yes \_\_\_\_\_ No \_\_\_\_\_
- c. Can the stated (claimed) percentage of reduction be determined using the method in the following example: Yes \_\_\_\_\_ No \_\_\_\_\_

“Less or Reduced Fat” Example (PF10(b)(2)):

Assume the following three products:

Guarantee	Brand A	Brand B	Brand C
% fat (min)	10	5	5
% fat (max)	not declared	9	7

Claims:

Calculation used when there is no maximum fat listed for product to which claim is compared	“Brand B has 10% less fat than Brand A”	Brand B(max) - Brand A(min)/Brand A(min) = $(9-10)/10 = -1/10 = -10\%$
Calculation used when both products have maximum fat guaranteed	“Brand C has 22% less fat than Brand B”	Brand C(max) - Brand B(max)/Brand B(max) = $(7-9)/9 = -2/9 = -22\%$

- d. Is percent fat reduction and name of the product of comparison juxtaposed with the most prominent use of the claim on each panel? PF10(b)(2)(A)(i) Yes \_\_\_\_\_ No \_\_\_\_\_
- e. Is the statement in the same style, color and at least 1/2 size type as the claim? PF10(b)(2)(A)(ii) Yes \_\_\_\_\_ No \_\_\_\_\_
- f. Is there a minimum and maximum percent crude fat guarantee? PF10(b)(2)(A)(iii) Yes \_\_\_\_\_ No \_\_\_\_\_
- g. Are compared products in same moisture categories (e.g., both products must be less than 20% moisture)? PF10(b)(2)(B)

Yes \_\_\_\_\_ No \_\_\_\_\_

**XIV. Manufacturer or Distributor – Model Pet Food Regulation PF11**

- 1) Is there a name and address, including zip code, of the manufacturer or distributor on label? PF11(a) Yes \_\_\_\_\_ No \_\_\_\_\_

**XV. Attachments**

- 1) If brochures, pamphlets, website, advertisements, promotional material, etc., are produced for this product, does all of the information comply with the AAFCO Pet Food Model Regulations? Yes \_\_\_\_\_ No \_\_\_\_\_

**XVI. Raw Milk Distributed as Pet or Specialty Pet Food- Model Bill 3(t); Model Bill 8(i)((1)-(6); Model Pet Food Regulations PF2(i); PF(3)(g);**

- 1) Does the product fit the definition of “Raw Milk”? Model Bill (Section 3)(t)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) Is the raw milk appropriately “decharacterized” using a sufficient quantity of animal feed appropriate food coloring; **or** is it certified and labeled as Organic in compliance with the USDA National Organic Program requirements? Model Bill (8)(i)(1-3) Yes \_\_\_\_\_ No \_\_\_\_\_
- 3) Is the raw milk appropriately packaged in a packaging that does not resemble packaging used for milk consumed by Humans? Model Bill (Section 8)(4)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 4) Is the raw milk offered for sale sufficiently separate from of the vicinity of milk or milk products for human consumption? Model Bill (Section8)(5)  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 5) Have no other “Prohibited Acts” found in Model Bill Section 8 “Prohibited Acts” been violated?  
Yes \_\_\_\_\_ No \_\_\_\_\_
- 6) If this product is raw milk distributed as pet food or specialty pet food, is the statement : **“WARNING: NOT FOR HUMAN CONSUMPTION-THIS PRODUCT HAS NOT BEEN PASTEURIZED AND MAY CONTAIN HARMFUL BACTERIA.”** conspicuously placed on the principal display panel and in font size not smaller than required by the following table?

Panel Size	Minimum Warning Statement Type Size
<5 square in.	1/16 in.
≥5-<25 sq. in.	1/8 in.
≥25-<100 sq. in.	3/16 in.

≥100-<400 sq. in.	1/4 in.
≥400 sq. in. +	1/2 in.

Yes \_\_\_\_\_ No \_\_\_\_\_

- 7) If the pet food or specialty pet food consists of raw milk, do the words “Raw (Blank) Milk” appear conspicuously on the display panel? \*Blank to be completed using the species of animal from which the milk is collected (e.g. “Raw Goat Milk,” “Raw Sheep Milk”) Yes \_\_\_\_\_ No \_\_\_\_\_

***XVII. Direct Fed Microbials and Enzyme labeling (Pet Food and Specialty Pet Food)***

**Direct Fed Microbials - Model Regulation 9(b)(4)**

If the product claims to be a source of, or guarantees, probiotics or direct-fed microbials:

- 1) Does the label bear the statement “Contains a source of live (viable) naturally occurring microorganisms”? MR 9(b)(4)(II) Yes \_\_\_\_\_ No \_\_\_\_\_
- 2) Is there a guarantee for total microbes with a parenthetical species list or, for individual species, listed in descending order of predominance by microbial number? MR 4(g) Yes \_\_\_\_\_ No \_\_\_\_\_
- 3) Does the guarantee include only organisms from ingredient definition 36.14 or 96.2 or 96.8 (if yeast)? Yes \_\_\_\_\_ No \_\_\_\_\_
- 4) Is the guarantee stated in colony forming units per unit fed, based on the feeding directions (either CFU/g or CFU/lb)? MR 4(g) Yes \_\_\_\_\_ No \_\_\_\_\_
- 5) On pet food labels (dog and cat): Is there an asterisk with the guarantee, referring to the disclaimer statement “Not recognized as an essential nutrient by the AAFCO Dog (or Cat) Food Nutrient Profiles”? Yes \_\_\_\_\_ No \_\_\_\_\_
- 6) On specialty pet food labels: If an AAFCO-recognized profile exists, is there an asterisk with the guarantee, referring to the disclaimer statement “Not recognized as an essential nutrient by the \_\_\_\_\_”? PF4(a)(4) Yes \_\_\_\_\_ No \_\_\_\_\_
- 7) Does the product include an ingredient from ingredient definition 36.11 or 36.12 or 96.2 or 96.8 (if yeast)? Yes \_\_\_\_\_ No \_\_\_\_\_
  - a. If the direct fed microbial is a source of bacteria, is the ingredient listed in the ingredient statement using the appropriate fermentation product definition, with the organism name input into the blank? (Example: Dried

Lactobacillus acidophilus fermentation product; Liquid Bifidobacterium bifidum fermentation product) Yes\_\_\_\_ No\_\_\_\_

- b. If the direct fed microbial is a source of yeast, is the ingredient listed as “active dry yeast” or “yeast culture” in the ingredient statement?  
Yes\_\_\_\_ No\_\_\_\_

*Note: Direct fed microbial ingredients that are a source of bacteria are listed in the ingredient statement using two definitions: The Genus species as listed in 36.14 and the type of fermentation product (Dried Genus species fermentation product or Liquid Genus species fermentation product). They are never listed as just “Genus species” in the ingredient statement. Direct fed microbials that are a source of yeast are listed in the ingredient statement using one of two definitions: Active dry yeast or Yeast culture.*

### **Enzymes-- Model Regulation 9(b)(5)**

If the product claims to be a source of- or guarantees- enzyme activity:

- 1) Is there a guarantee for enzyme(s)? MR 9(b)(5)(II)  
Yes\_\_\_\_ No\_\_\_\_
  - c. Is the source of enzyme activity shown in the guarantee (e.g. Protease (Aspergillus niger))? MR 4(h) Yes\_\_\_\_ No\_\_\_\_
  - d. Is the guarantee listed in the units of enzymatic activity per amount of product fed, consistent with label directions (e.g. mg amino acids liberated/min/g)? MR 4(h) Yes\_\_\_\_ No\_\_\_\_
- 2) If multiples sources of enzyme activity are guaranteed, are the sources identified in the guarantee in descending order of predominance of enzyme activity? MR 4(h) Yes\_\_\_\_ No\_\_\_\_
- 3) On pet food labels (Dog and Cat): is there an asterisk with the guarantee referring to the disclaimer statement “Not recognized as essential by the AAFCO Dog (or Cat) Food Nutrient Profile”? Yes\_\_\_\_ No\_\_\_\_
- 4) On specialty pet food labels: If an AAFCO-recognized profile exists, is there an asterisk with the guarantee, referring to the disclaimer statement “Not recognized as essential by the \_\_\_\_\_”? Yes\_\_\_\_ No\_\_\_\_
- 5) If the enzyme is derived from a microbial source, does the product include an ingredient from ingredient definition 36.6, 36.7, 36.11, or 36.12?

Yes \_\_\_\_\_ No \_\_\_\_\_

a. Is the source shown in ingredient definition 30.1? PF(5)(a)(3)

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Is the source associated with the guaranteed enzyme?

Yes \_\_\_\_\_ No \_\_\_\_\_

*Note: For example if the label bears a guarantee for lipase, the ingredient statement must include the appropriate source of enzyme activity, such as: Dried Aspergillus niger fermentation extract.*

6) If the enzyme is derived from a plant or animal product, does the product contain an ingredient providing enzyme activity corresponding to the enzyme in ingredient definition 30.1? Model Bill Section 5(a)(3) Labeling Yes \_\_\_\_\_ No \_\_\_\_\_

a. Is the source shown in ingredient definition 30.1? PF(5)(a)(3)

Yes \_\_\_\_\_ No \_\_\_\_\_

b. Is the source associated with the guaranteed enzyme?

Yes \_\_\_\_\_ No \_\_\_\_\_

*Note: Example (1) If the label bears a guarantee for lipase, the ingredient statement must include the appropriate source of enzyme activity, such as: Dried lamb pancreas; Example (2) If the label bears a guarantee for bromelain, the ingredient statement must include the appropriate source of enzyme activity, such as: Dried pineapple.*