



INDUSTRY PERSPECTIVE ON CARBOHYDRATE/FIBER GUARANTEES

PET NUTRITION
FACTS BOX
SUBGROUP

TRADE ASSOCIATION RESPONSE

PFI SUPPORTS VERSION D

-INFORMATION CIRCULATED TO MEMBERS

-LABEL MODERNIZATION TASK FORCE DISCUSSED INPUT AND TOOK POSITION

AFIA SUPPORTS VERSION E

(10 out of 16 prefer E (3 prefer D and 3 neither)

-INFORMATION CIRCULATED TO PET FOOD COMMITTEE MEMBERS

-RESPONSES COMPILED (16 responses in 3 weeks)

The respondents include representatives from pet food manufacturers,

ingredient suppliers, diet formulators, and a least one regulator now employed in industry.

Calories Per Cup (calculated)		449
From: Protein 153, Fat 54, Carbohydrate 242		
	Guaranteed Amount	Amount Per Cup
Protein	34% Min	40.8 g
Fat	12% Min	14.4 g
Non Fiber Carbohydrate	34% Max	40.8 g
Dietary Fiber	10% Max	12.0 g
Moisture	10% Max	12.0 g

Calories Per Cup (calculated)		449
From: Protein 153, Fat 54, Carbohydrate 242		
	Guaranteed Amount	Amount Per Cup
Protein	34% Min	40.8 g
Fat	12% Min	14.4 g
Total Carbohydrate	36% Max	43.2 g
Starch & Sugars	26% Max	31.2 g
Dietary Fiber	10% Max	12.0 g
Moisture	10% Max	12.0 g

TRADE ASSOCIATION RESPONSE- AFIA

POSITIVE

- “Consumer familiarity with Total Carbohydrate and then the breakdown of Dietary Fiber and Total Sugars (human nutrition facts box below)”
- “It addresses the amount of highly digestible carbohydrates likely to affect the glycemic response within the animal”
- “replacing the crude fiber with dietary fiber which, albeit not perfect, is a better representation of non-nutritive constituents present in the food”

TRADE ASSOCIATION RESPONSE- AFIA

NEGATIVE

- “State laws/regulations do not reflect this type of labeling (the header must be Guaranteed Analysis, they must guarantee crude protein, crude fat, crude fiber and moisture)”
- Cost Implications (increased analytical testing, updates to ingredient database, packaging updates and disposals)
- Education/Training for regulators, consumers and veterinarians
- “Limited space for 3 oz (85g) can or pouch, Are they planning to have different formats?”
- “Will AOAC methods for dietary fiber, starch, sugar, and total carbohydrates be determined”

CRUDE FIBER INTERCONNECTIVITY IN THE OP

Crude Fiber is deeply rooted in

- State Commercial Feed Laws,
- AAFCO OP & Pet Food Model Regulations,
- AAFCO protocols for determination of Metabolized Energy, and
- Imbedded in specifications for many AAFCO ingredient definitions

Areas of where edits, references or guidance might be necessary

Model Regulations for Pet Food PF4 – Expression of Guarantees

- + Associated Pet Food Label Review Checklist (OP pp206-213)

Model Regulations for Pet Food PF9 – Statements of Calorie Content

- + Associated Pet Food Label Review Checklist (OP pp206-213)

Modified Atwater calculation

Affidavit & Worksheets for Dog & Cat Food Calorie Content (calculation) (OP pp206-213)

AAFCO Defined Ingredients (OP chapter 7)

TOTAL DIETARY FIBER

POSITIVE

CONSUMER TRANSPARENCY - FAMILIARITY

HUMAN FOOD NUTRITION FACTS BOX USES TOTAL DIETARY FIBER

BETTER NUTRITIONAL INDICATOR

NEGATIVE

GUARANTEED AMOUNT WILL BE SUBSTANTIALLY HIGHER
THAN CURRENT CRUDE FIBER

CONSUMER PERCEPTION – ADDED FILLERS

EDUCATION WILL BE ESSENTIAL

SUGARS

POSITIVE

CONSUMER FAMILIARITY WITH THE TERM

NEGATIVE

THE HUMAN FACTS BOX SHOWS ADDED SUGAR

SUGARS IN PET FOOD ARE NOT ADDED

GUARANTEE WILL BE MIS-UNDERSTOOD/MISLEADING

A SECONDARY CONSIDERATION - COST

	<u>TEST</u>	<u>TEST COST</u>	<u>TOTAL COST</u>
CURRENT SITUATION	CRUDE FIBER	\$25	\$25
VERSION D	TOTAL DIETARY FIBER	\$250	\$250
VERSION E	TOTAL DIETARY FIBER	\$250	
	STARCHES		
	SUGARS		
	(COMBINED)	\$225	\$475

COSTS ACCRUE TO INDUSTRY AND TO STATE LABORATORIES

A CALCULATED GUARANTEE?

NON FIBER CARBOHYDRATES

- A CALCULATION – REGULATOR/LAB CONCERN

TOTAL CARBOHYDRATES

- ALSO A CALCULATION

Depends on moisture, protein, fat and ash, each of which may have issues related to extraction, temperature or things such as nitrogen factor, making the overall calculation inaccurate.

There is a similar application of a calculation in cattle feed with Non-Protein Nitrogen in Guaranteed Analysis

INDUSTRY (PET MANUFACTURES) PERSPECTIVE

PREFER D

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LESS COSTLY, WOULD ALLOW FOR
NFC CALCULATION

SUGAR GUARANTEE WILL BE
MIS-UNDERSTOOD/MISLEADING