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 COMPARED (16 responses in 3 weeks)
The respondents include representatives from pet food manufacturers, ingredient suppliers, diet formulators, and at least one regulator now employed in industry.
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 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

<table>
<thead>
<tr>
<th>Test</th>
<th>Test Cost</th>
<th>Total Cost</th>
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<tbody>
<tr>
<td>Current Situation</td>
<td>Crude Fiber</td>
<td>$25</td>
</tr>
<tr>
<td>Version D</td>
<td>Total Dietary Fiber</td>
<td>$250</td>
</tr>
<tr>
<td>Version E</td>
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<tr>
<td></td>
<td>Starches</td>
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</tr>
<tr>
<td></td>
<td>Sugars</td>
<td></td>
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<tr>
<td></td>
<td>(Combined)</td>
<td>$225</td>
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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

LESS COSTLY, WOULD ALLOW FOR NFC CALCULATION

SUGAR GUARANTEE WILL BE MIS-UNDERSTOOD/MISLEADING