

Proposed Revision to PF5 (ATTACHMENT E)

Pet Food Committee Recommendation:

The PFC recommends that the following revisions be considered by the MBRC for integration into the AAFCO Official Publication.

Background

Methods used to calculate the ingredient inclusion rates for percentage claims on pet food labels has become inconsistent and possibly misleading to the consumer. This workgroup was formed to review current regulations and provide recommendations to the committee.

Workgroup Recommendations:

Regulation PF5. Ingredients

- (a) Each ingredient of a pet food or specialty pet food shall be listed in the ingredient statement as follows:
 - (1) The names of all ingredients in the ingredient statement shall be shown in letters or type of the same size, style and color;
 - (2) The ingredients shall be listed in descending order by their predominance by weight in non-quantitative terms;
 - Ingredients shall be listed and identified by the name and definition established by AAFCO; and
 - (4) Any ingredient for which no name and definition have been so established shall be identified by the common or usual name of the ingredient.
- (b) The ingredients "meat" or "meat by-products" shall be qualified to designate the animal from which the meat or meat by-products are derived unless the meat or meat by-products are derived from cattle, swine, sheep, goats, or any combination thereof. For example, ingredients derived from horses shall be listed as "horsemeat" or "horsemeat by-products."
- (c) Brand or trade names shall not be used in the ingredient statement.
- (d) A reference to the quality, nature, form, or other attribute of an ingredient shall be allowed when the reference meets all of the following:
 - (1) The designation is not false or misleading;
 - (2) The ingredient imparts a distinctive characteristic to the pet food or specialty pet food because it possesses that attribute; and
 - (3) A reference to quality or grade of the ingredient does not appear in the ingredient statement.
- (e) Any reference to the percentage of an ingredient or combination of ingredients, by symbol or word, in the brand or product name or elsewhere on a pet food or specialty food label, shall be based in relation to the total weight of all ingredients in the product.
 - The names of the ingredient(s) shall appear in order of predominance by weight in the
 product, provided that names of flavors due to their varying intensity can be in any
 order.
 - (2) Where water sufficient for processing is excluded from the declared percentage, the exclusion of water shall be indicated in words juxtaposed to, the same style and color print and at least one-half the print size of the stated percentage (e.g., "95% beef exclusive of water" or "95 percent chicken and liver exclusive of water").