



**AAFCO**  
Association of American Feed Control Officials

# “PF5 Overview”

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INGREDIENT SUBGROUP RECOMMENDATIONS TO PET FOOD COMMITTEE

1/22/2020      VERSION 1 (11MIN)(DRAFT)

# Pet Food Modernization Workgroup

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PFC was Charged by the AAFCO Board to:

“Review and consider potential changes to modernize pet food labeling that enhances transparency and expands safety, taking into account the following: • Alignment with human food nutrition box formatting • Use of front-of-packaging nutrition cues • Consideration of microbial risks and safe handling instructions • Availability of new sugar and dietary starch methods • Use of modern fiber labeling • Ideas put forth in the public comments received on the FDAAA proposed regulation.”

Four subgroups are working.

# Ingredients Subgroup

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Task: Review and modernize regulations concerning the ingredient listing on pet food labels.

We've identified consumers want a clearer and more understandable ingredient list.

- Proposed ideas
  - Grouping by function (vitamins, Minerals)
  - ~~◦ Grouping by inclusion level (under 2%)~~ Removed after consumer panel testing
  - Aligning with human food regulations for nomenclature
  - ~~◦ Renaming some ingredients or better explaining them~~ (transferred to IDC)

# WORKGROUP RECOMMENDATION:

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Recommend that PFC discuss the proposed language in January 2020 and provide the workgroup comments by 4/4/2020. *Workgroup will take comments and provide a final recommendation by 6/22/2020 to PFC.*

# RECOMMENDED LANGUAGE (A)(2):

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The ingredients shall be listed in descending order by their predominance by weight in non-quantitative terms, **except if the ingredient is a vitamin and/or mineral premix**, the premix may be declared in order of predominance by the name "vitamins" or "minerals," as appropriate, followed by a parenthetical listing of all the vitamins and/or minerals in the premix, each in their order of predominance by weight as listed on the ingredient statement of the premix label.

# RECOMMENDED LANGUAGE (A)(3):

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Ingredients shall be listed and identified by the common name established by AAFCO, except any ingredient for which **no AAFCO common name exists** shall be identified by the common or usual name of the ingredient. This may include very common ingredients (e.g. sugar, water, corn, oats) or human foods (e.g. blueberries, spinach, carrot). It shall be the responsibility of the manufacturer to ensure that the ingredient is safe and suitable for use in pet food or specialty pet food in accordance with good feeding practices for the intended species **prior to distribution.**

# RECOMMENDED LANGUAGE (a):

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Human food CFR language adapted and adopted for:

4) Standards of Identity

5) Meat

6) Fish

7) Animal Fat

8) Vegetable Oil

9) Sugar

# RECOMMENDED LANGUAGE b,c,d:

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b) Brand or trade names shall not be used in the ingredient statement.

c) A reference to the quality, nature, form, or other attribute of an ingredient shall be allowed when the reference meets all of the following:

- The designation is not false or misleading;
- The ingredient imparts a distinctive characteristic to the pet food or Specialty pet food because it possesses that attribute; and
- A reference to quality or grade of the ingredient does not appear in the Ingredient statement.

d) If properly used as specified by an organic certification body the term “organic” does not apply to PF5(c).



# Regulation PF5 (2021) Schedule :

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Discuss language in AAFCO Pet Food Committee

PFC accepts language

Model Bill Concurs on language & Placement

Board of Directors makes Recommendation to Membership

Association Membership accepts or rejects recommended language

Language published in the AAFCO Official Publication

States enact rules to enforce new label format for pet food

# Summary

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Workgroup report is in the feed BIN library / Pet Food /

Workgroup wants PFC & public comments before delivering final recommendation

Possible for membership to adopt in January 2021

States need to do rulemaking to adopt



Think of something after the discussion?

Email: [aafco@aafco.org](mailto:aafco@aafco.org)



Want more information about AAFCO pet food regulations?

Consumers: AAFCO Talks Pet Food <http://talkspetfood.aafco.org/>

Manufacturers: Business of Pet Food <http://petfood.aafco.org/>