History of Pet Food Label Modernization

In 2015, AAFCO began the Pet Food Label Modernization (PFLM) project to update the Pet Food Model Regulations. The goal is to enhance transparency, more closely align with human food labeling, and improve understanding by the consumer. Multiple rounds of consumer research were conducted to understand how pet food labels can better communicate important information.

AAFCO sought public comment on the draft Pet Food Model Regulations and revised the draft based on the feedback. Additionally, AAFCO surveyed state feed program administrators to gather information on each state's knowledge of the draft Pet Food Model Regulations and how the changes would impact each state. AAFCO is using this information to develop a plan to support uniform state implementation of the new regulations.

Major Label Changes

1. Nutrition Facts Box – Updated to more closely resemble human food labeling; Calories are stated using common household measurements; Total Carbohydrate and Dietary Fiber guarantees replace the Crude Fiber guarantee; a nutritional adequacy statement is required at the bottom of the nutrition facts box.

2. Intended Use Statement – Required on the lower third of the principal display panel to help consumers easily identify the intended life stage and purpose of the pet food including treats, food supplements and food mixers.

3. Ingredient Statement – Updated to clarify the use of parentheticals and common or usual names.

4. Handling and Storage (optional) – Standardized to identify header requirement and optional icons.
Impacts – Are you ready?

The beneficial changes associated with PFLM will place fiscal, staffing and time demands on regulators and industry and will affect every pet food product distributed in the United States. Planning and timing are crucial for successful implementation of PFLM.

**Regulatory Programs** – Identify those with rule-making authority; engage in education and training; update websites; manage dual labels during the discretionary period; determine point of contact for inquiries; communicate and collaborate within and outside the regulatory authority to optimize outreach efforts.

**Labs** – Access to appropriate methods; supplies; mode of analysis; method validation; time; technician availability and training. For example, “crude fiber” claims will be replaced with “dietary fiber” to reflect the maximum percentage of the total dietary fiber as a part of the total carbohydrate guarantee.

**Legislative** – A state-specific process: create timeline; assess fiscal impact on programs as well as industry; identify stakeholders and obtain their support.

**Industry** - Design/rebranding/refresh; artwork creation; packaging materials and printing; information systems changes; websites/e-commerce accommodations; increased laboratory analyses (TDF); domestic registration when time for renewal (and internationally if applicable); outreach: advertising and/or educating retailers and consumers.

**Regulatory Discretionary Period**

Each state has its own rule making process that outlines how these regulations may be adopted within the borders of that state. During this process, AAFCO recommends a transition period of six years for manufacturers to fully incorporate the label and packaging changes to their products. Pet owners will see some changes before then, but all packaging should be consistent by the end of the six-year period.

AAFCO will be providing additional resources, regulator and manufacturer training materials, and information for pet owners as the new label and packaging requirements are being implemented.

The PFLM has been a collaboration between AAFCO, regulators, industry and consumers. For more information, visit aafco.org/pflm or contact aafco@aafco.org.