



**AAFCO**<sup>®</sup>  
Association of American Feed Control Officials

## AAFCO Position on Enforcement Discretion Related to Pet Food Label Modernization Changes

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### Background

Since 2015, the Association of American Feed Control Officials (AAFCO) has been working collaboratively with stakeholders to modernize and update the model regulations that set the requirements for pet food labeling. The ultimate goal was to provide consumers and regulators with labeling information that is transparent, easy to understand, and in a format more familiar to consumers. This has been a meticulous process where AAFCO has conducted multiple rounds of consumer research, formed numerous workgroups that consisted of both regulators and pet food industry advisors, and solicited open feedback during a public comment period. The final product came to fruition on July 31, 2023, when AAFCO membership voted to approve the changes in the new *Model Regulations for Pet Food and Specialty Pet Food*.

### Next Steps for the Revised *Model Regulations for Pet Food and Specialty Pet Food*

With the passage of the revised *AAFCO Model Regulations for Pet Food and Specialty Pet Food*, henceforth called *regulations*, comes the important duty of rulemaking for individual states across the country that have regulations for pet food and specialty pet food products. Each state has their own rulemaking process that outlines how regulations need to be promulgated within the borders of their state.

AAFCO strongly encourages uniform and timely adoption to ensure alignment and consistency. Each state should make a determination on adoption and enforcement with the recommendation to begin the formal rulemaking process. AAFCO is committed to working with our members and partners to ensure as much of a uniform adoption process as possible.

### Recommended Enforcement Discretion Period

AAFCO recommends that state feed regulatory programs utilize enforcement discretion in the review of pet food labels for a period of six years, based on the date of the availability of the printed version of the *2024 Official Publication*.

As states begin the rulemaking process, AAFCO encourages members to allow for the distribution of pet food products that are in compliance with current state pet food regulations, as well as the newly approved regulations. Additionally, the association recommends state members work closely with pet food manufacturers and distributors within their state to set a goal of achieving full implementation with the regulation changes within the six-year period.

AAFCO's Pet Food Committee will evaluate this enforcement discretion recommendation annually, taking into consideration potential issues or challenges that may arise such as: methodology alignment, instrumentation procurement and time to build data sets pertaining to total dietary fiber; label and formulation development, website/e-commerce platforms and other software development related to market activities; and access to packaging design, printing and laboratory analysis support.

## **Conclusion**

AAFCO and stakeholders have worked together tirelessly over the past eight years to develop these model regulations. Successful implementation of the regulations will require the same cooperative effort. As an association, we are committed to working to creating a seamless transition for regulators, regulated industry and consumers. With support from all parties, we believe this will be a positive change and another opportunity to create better harmonization for pet food regulations amongst states.

Pet Food Label Modernization has been a collaboration between AAFCO, regulators, industry and consumers. For more information and materials, visit [aafco.org](http://aafco.org) or contact [aafco@aafco.org](mailto:aafco@aafco.org).