



AAFCO
Association of American Feed Control Officials

Ingredients Model Regulation PF6. and Handling and Storage Instructions Model Regulation PF12. Guidance

This guidance is for educational purposes only and does not replace the information in the AAFCO Official Publication



AAFCO
Association of American Feed Control Officials



Version 04.23.25

What is AAFCO?

The Association of American Feed Control Officials (AAFCO) is a non-profit organization that sets standards for both animal feeds and pet foods in the United States.

AAFCO is a collaborative association that supports members and stakeholders and promotes a safe feed supply through unified system-based regulation, feed ingredients standards, and laboratory operations.

AAFCO has been guiding state, federal and international feed regulators with ingredient definitions, label standards and laboratory standards for more than 110 years, while supporting the health and safety of people and animals. Our members are charged by their state or federal laws to regulate the manufacture, sale, and distribution of animal feeds and animal drug remedies.



Background of Pet Food Label Modernization

In 2015, AAFCO began the Pet Food Label Modernization (PFLM) project to update the Pet Food and Specialty Pet Food Model Regulations that set the model for labeling requirements. The goal was to standardize labeling formats to enhance transparency and improve consumer understanding.

Multiple rounds of consumer research were conducted to gain understanding on how pet food labels can better communicate important information. AAFCO sought input from industry, state and federal regulators, and public comments on the draft PFLM Model Regulations and made revisions based on the feedback. The PFLM Model Regulations for Pet Food and Specialty Pet Food were accepted by AAFCO membership in August 2023. The PFLM Model Regulations became effective as of January 1, 2024.

AAFCO recommends that state feed regulatory programs use enforcement discretion for a period of up to six (6) years for implementation.

What does this mean for me?

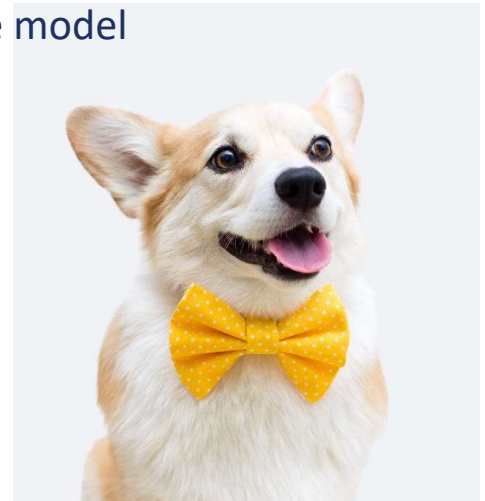
Once the discretion period mentioned on the previous page is over, many states will require all pet and specialty pet food labels to follow the new Pet Food and Specialty Pet Food Model Regulations given in the AAFCO Official Publication (2024 and on).

During the discretion period, labels following the old Pet Food and Specialty Pet Food Model Regulations, given in the 2023 AAFCO Official Publication, will still be acceptable. However, hybrid labels (mixing the old and the new model regulations) are not acceptable.

This guidance has been developed as a tool to assist with the new Pet Food and Specialty Pet Food Model Regulations. The information is to be used in conjunction with the model regulations in the AAFCO Official Publication.

The following publications are available for purchase:

- [AAFCO Official Publication](#)
- [Pet and Specialty Pet Food Labeling Guide](#)



What Species & Products Does This Apply To?

- Applies to pet foods and specialty pet foods
 - **Pets** are defined as cats and dogs – Model Bill Section 3(q)
 - **Specialty pets** are defined as animals normally maintained in a household such as rodents, ornamental birds, ornamental fish, reptiles and amphibians, ferrets, hedgehogs, marsupials, rabbits not raised for food or fur, and others - Model Bill Section 3(u)
- Applies to **ALL** food types for these animals:
 - Complete Foods for Pets
 - Daily Foods for Specialty Pets
 - Treats
 - Food Supplements
 - Food Mixers
 - Veterinary Diets



Ingredients Model Regulation PF6.



Listing of Ingredients

- **“Ingredient Statement”** means a collective and contiguous listing on the label of the ingredients of which the pet food or specialty pet food is composed.
 - Must be in paragraph form with ingredients separated by commas
- Ingredients must be listed in descending order by their predominance by weight (most to least)
 - Quantitative terms are not allowed; such as chicken (14%), rice (12%)
- The names of all ingredients in the ingredient statement must be in letters or type of the same size, style, and color.



Ingredient Names

- Ingredients must be listed and identified by the name established in the AAFCO Official Publication Chapter 6, unless no AAFCO defined ingredient name exists, then the ingredient must then be identified by the common or usual name as appropriate.
- Sources of ingredient names can be found in the:
 - AAFCO Official Publication
 - AAFCO Common Foods Index
 - Code of Federal Regulations Title 21

AAFCO Common Food Index

- The AAFCO Common Food Index is a list of commonly available foods that may be used in animal food, typically whole foods, that are not specifically defined by AAFCO.
- The foods listed within the index are available in the Online Database of Ingredients (ODI), accessible on the AAFCO Feed Bin and at www.aaftco.org.

It is always the responsibility of the food manufacturer to determine that their ingredients and formulation are safe for the product purpose and intended species.

Common and Usual Ingredient Names

Examples: blueberries, pumpkin, salt

Ingredients: Cod, Brown Rice, Organic Rice, Chicken Fat (preserved with mixed Tocopherols), Blueberries, Pumpkin, Flaxseed, Natural Flavors, Potassium Chloride, Salt, Minerals (Zinc Proteinate, Iron Proteinate, Copper Proteinate, Manganese Proteinate, Calcium Iodate), Vitamin E Supplement, Vitamin B₁ (Thiamine Mononitrate), Vitamin B₁₂ Supplement, Rosemary Extract

Use of Scientific Names

- In general, scientific names are not allowed as ingredient names, but there is an exception for microorganisms
 - The AAFCO defined name of the microorganism must be used
 - Microorganisms, including the genus and species, may be shown in italics

Example: Dried *Aspergillus oryzae* Fermentation Product

Cod, Brown Rice, Organic Rice, Chicken Fat (preserved with mixed Tocopherols), Blueberries, Pumpkin, Flaxseed, Natural Flavors, Potassium Chloride, Salt, Minerals (Zinc Proteinate, Iron Proteinate, Copper Proteinate, Manganese Proteinate, Calcium Iodate), Vitamin E Supplement, **Dried *Aspergillus oryzae* Fermentation Product**, Vitamin B₁ (Thiamine Mononitrate), Vitamin B₁₂ Supplement, Rosemary Extract



Vitamin Nomenclature for Labeling Finished Pet Foods

The following slide shows Table 90.27 from the AAFCO OP, which allows for the use of commonly recognized vitamin names in addition to the approved scientific names.

Example: Vitamin B7 (Biotin)



Table 90.27 Vitamin Nomenclature for Labeling Finished Pet Foods

Label Listing	Ingredient Definition	Label Listing	Ingredient Definition
Vitamin A (Vitamin A Acetate)	90.25 Vitamin A Acetate	Vitamin B5 (D-Pantothenyl Alcohol)	21 CFR 582.5580 D-Pantothenyl Alcohol
Vitamin A (Vitamin A Palmitate)	90.25 Vitamin A Palmitate	Vitamin B5 (Sodium Pantothenate)	21 CFR 582.5772 Sodium Pantothenate
Vitamin A (Vitamin A Propionate)	90.25 Vitamin A Propionate	Vitamin B6 (Pyridoxine Hydrochloride)	90.25 Pyridoxine Hydrochloride
Vitamin B1 (Thiamine Hydrochloride)	90.25 Thiamine Hydrochloride	Vitamin B7 (Biotin)	90.25 Biotin
Vitamin B1 (Thiamine Mononitrate)	90.25 Thiamine Mononitrate	Vitamin B9 (Folic Acid)	90.25 Folic Acid
Vitamin B2 (Riboflavin)	90.25 Riboflavin	Vitamin C (Ascorbic Acid)	90.25 Ascorbic Acid
Vitamin B2 (Riboflavin-5-phosphate)	21 CFR 582.5697 Riboflavin-5-phosphate	Vitamin C (L-Ascorbyl-2-polyphosphate)	90.25 L-Ascorbyl-2-polyphosphate
Vitamin B3 (Niacin)	90.25 Niacin; nicotinic acid	Vitamin C (Calcium Ascorbate)*	90.25 Calcium Ascorbate
Vitamin B3 (Niacinamide)	90.25 Niacinamide; nicotinamide	Vitamin C (Calcium L-Ascorbyl-2-Monophosphate)	90.25 Calcium L-ascorbyl-2-monophosphate
Choline (Choline Pantothenate)	90.25 Choline Pantothenate	Vitamin C (Erythorbic Acid)	90.25 Erythorbic Acid (Iso ascorbic acid)
Choline (Choline Chloride)	90.25 Choline Chloride	Vitamin D2 (Ergocalciferol)	21 CFR 582.5950 Vitamin D2
Choline (Choline Bitartrate)	90.26 Choline Bitartrate	Vitamin D3 (Cholecalciferol)	21 CFR 582.5953 Vitamin D3
Vitamin B5 (Calcium Pantothenate)	90.25 Calcium Pantothenate	Vitamin E (α-Tocopherol Acetate)	90.25 α -tocopherol acetate
Vitamin B5 (Choline Pantothenate)	90.25 Choline Pantothenate	Vitamin E (Tocopherols)	90.25 Tocopherol (α -tocopherol)

Vitamin and Mineral Premixes

- The premix ingredients may be declared in order of predominance by weight (most to least), indicated by the name “Vitamins” or “Minerals”, as appropriate;
- The term “Vitamins” and/or “Minerals” should be followed by a parenthetical listing of all the vitamins and/or minerals within the premix,
 - Each should be listed in their order of predominance by weight as listed on the ingredient statement of the premix label
- If additional vitamins and minerals are added to the formula separately from the premixes, they should not be included within the parentheses.

Vitamin and Mineral Premix Examples

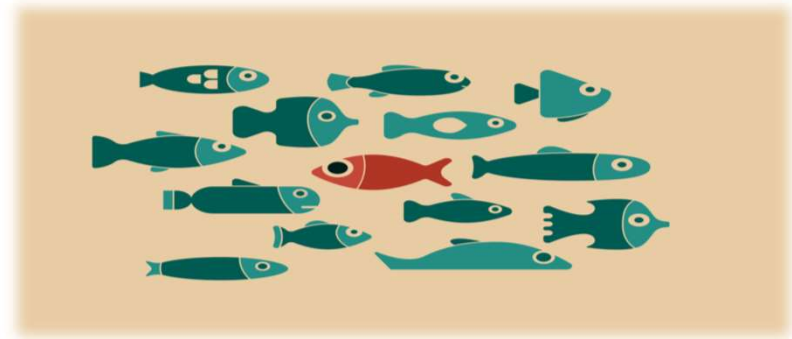
This ingredient statement example contains **two** premixes:

- The mineral premix is at a higher inclusion level by weight, therefore is listed first in the ingredient statement.
- **Minerals** (Copper Sulfate, Zinc Sulfate, Manganese Proteinate, Calcium Iodate)
- **Vitamins** (Vitamin E Supplement, Vitamin B₁ (Thiamine Mononitrate))

Ingredients: Cod, Brown Rice, Organic Rice, Chicken Fat (preserved with mixed Tocopherols), Blueberries, Sugar, Flaxseed, Natural Flavors, Potassium Chloride, Salt, **Minerals (Copper Sulfate, Zinc Sulfate, Manganese Proteinate, Calcium Iodate)**, **Vitamins (Vitamin E Supplement, Vitamin B₁ (Thiamine Mononitrate))**, Vitamin B₁₂ Supplement, Rosemary Extract

Fish

- For ingredients consisting of fish, “fish meal,” or “fish by-products”, the name of the ingredient may be designated as “fish”
~ or ~
- If it bears a name descriptive of its kind by using the acceptable market name(s) or common name of the individual fish species in the ingredient as established by the [FDA Seafood List](#), it must correspond thereto.
 - For Example: ocean whitefish, shrimp, cod
- Vernacular or slang names are not allowed in the ingredient statement or labeling.



Fish

Some Examples Include:

Cod, Ocean Whitefish, Cod Meal, Salmon By-Products

Cod, Corn, Ocean Whitefish, Cod Meal, Organic Rice, Chicken Fat (preserved with mixed Tocopherols), Salmon By-Products, Blueberries, Sugar, Flaxseed, Natural Flavors, Potassium Chloride, Salt, Minerals (Zinc Proteinate, Iron Proteinate, Copper Proteinate, Manganese Proteinate, Calcium Iodate), Vitamin E Supplement, Vitamin B₁ (Thiamine Mononitrate), Vitamin B₁₂ Supplement, Rosemary Extract

Sugar

- In the ingredient statement “sugar” must only refer to sucrose, which is obtained from sugar cane or sugar beets in accordance with Title 21 of the Code of Federal Regulations.
- For all other labeling purposes outside the ingredient list (for example, in the Nutrition Facts box), the term “sugar” shall be synonymous with “sugars” as defined in the AAFCO Official Feed Terms.
 - Sugars is a nutrient term and not an ingredient and includes things such as sucrose, lactose, and fructose as examples.



Organic

- Ingredients that are organic are allowed to be identified as such within the ingredient list (i.e., organic blueberries).
- Other organic claims made outside the ingredient statement are not allowed to be referenced unless the entire product is certified organic under the [USDA National Organic Program](#).
- Organic ingredients can be listed as either:
 - organic rice
 - ~ or ~
 - rice*
with * defined below the ingredient statement to indicate the ingredient is organically produced.



Organic Naming Example

Naming Example

Cod, Brown Rice, Organic Rice, Chicken Fat (preserved with mixed Tocopherols), Organic Blueberries, Sugar, Flaxseed, Natural Flavors, Potassium Chloride, Salt, Minerals (Zinc Proteinate, Iron Proteinate, Copper Proteinate, Manganese Proteinate, Calcium Iodate), Vitamin E Supplement, Vitamin B₁ (Thiamine Mononitrate), Vitamin B₁₂ Supplement, Rosemary Extract



Organic Asterisk Example

Asterisk Example

Cod, Brown Rice*, Rice*, Chicken Fat (preserved with mixed Tocopherols), Blueberries*, Sugar, Flaxseed*, Natural Flavors, Potassium Chloride, Salt, Minerals (Zinc Proteinate, Iron Proteinate, Copper Proteinate, Manganese Proteinate, Calcium Iodate), Vitamin E Supplement, Vitamin B₁ (Thiamine Mononitrate), Vitamin B₁₂ Supplement, Rosemary Extract

*organic



Ingredients Summary Example

Below are correct example placements of the ingredients discussed in earlier slides

Ingredients: Lamb, Cod, Brown Rice, Organic Rice, Chicken Fat (preserved with mixed Tocopherols), Blueberries, Sugar, Flaxseed, Natural Flavors, Potassium Chloride, Salt, Minerals (Zinc Proteinate, Iron Proteinate, Copper Proteinate, Manganese Proteinate, Calcium Iodate), Vitamins (Vitamin E Supplement, Vitamin B₁ (Thiamine Mononitrate)), Vitamin B₁₂ Supplement, Rosemary Extract

*Please note highlights are meant to indicate the topics covered in previous slides. Ingredient lists should not include highlights.



Handling and Storage Instructions Model Regulation PF12.



Handling and Storage Instructions

- Handling and Storage Instructions on labels are optional.
 - Not required, however, if present, they must follow the regulations.
 - Need a bolded header: "**Handling and Storage Instructions**"
 - With the exception that a header is not required for small packages with a total printable area less than 40 square inches.
 - Must be separate and distinct from any feeding directions.
 - Must be displayed in a conspicuous manner.



Handling and Storage Instructions

- If graphics are used, only the graphics shown below may be used.
 - Graphics and accompanying text are available on the [AAFCO website](http://www.aafco.org).



SEPARATE
from
human
food



CLEAN
hands,
surfaces, &
utensils



REFRIGERATE
unused
portions or
discard



KEEP OUT
OF REACH
of children



KEEP
FROZEN
until ready
to use



STORE
in a cool,
dry place



THROW
OUT
when in
doubt



SEPARATE
from
human
food



CLEAN
hands,
surfaces, &
utensils



REFRIGERATE
unused
portions or
discard



KEEP OUT
OF REACH
of children



KEEP
FROZEN
until ready
to use



STORE
in a cool,
dry place



THROW
OUT
when in
doubt



Resources

- Pet Food Label Modernization information [AAFCO PFLM](#)
- See [AAFCO Website](#) for more useful information
 - See “For Start Ups” under the Resources tab on the AAFCO home page
 - [Find Your State Feed Control Official](#)
- AAFCO Official Feed Terms, Common or Usual Ingredient Names and Ingredient Definitions [Chapter Six](#)
- The following publications are available for purchase:
 - The [AAFCO Official Publication](#)
 - The [Pet and Specialty Pet Food Labeling Guide](#)

