



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

# **Purpose Statement and Nutritional Adequacy Claims Model Regulation PF4. Guidance**

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



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 are 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?

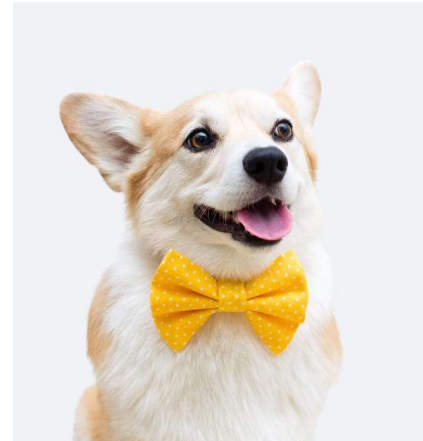
Once the discretion period mentioned on the previous page is over, many states will require all pet and specialty pet food labels to follow the new Pet Food and Specialty Pet Food Model Regulations given in the AAFCO Official Publication (2024 and on).

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.

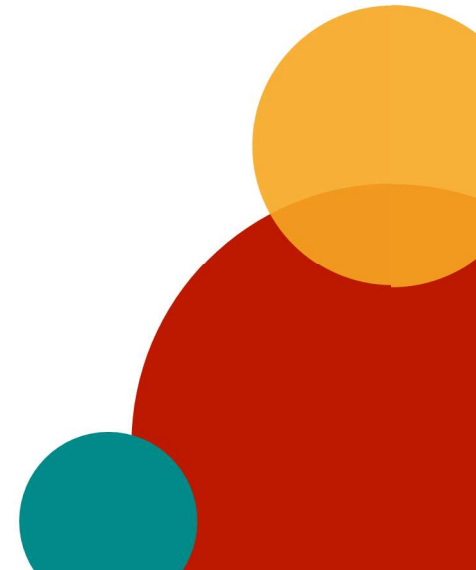
The following publications are available for purchase:

- [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



# Purpose Statement

When viewing the front of a pet or specialty pet food product, the Purpose Statement helps the consumer easily identify the intended species and the purpose of the product.

The **Purpose Statement** is required on the front panel of ALL pet and specialty pet foods.

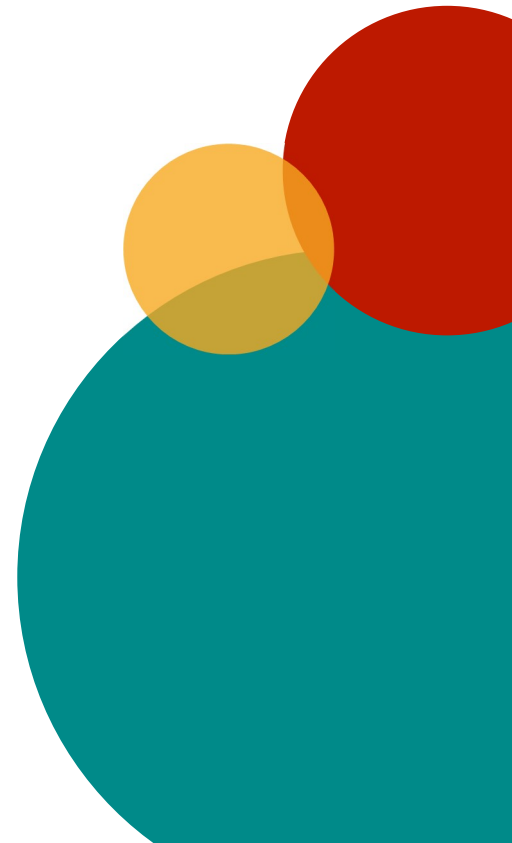
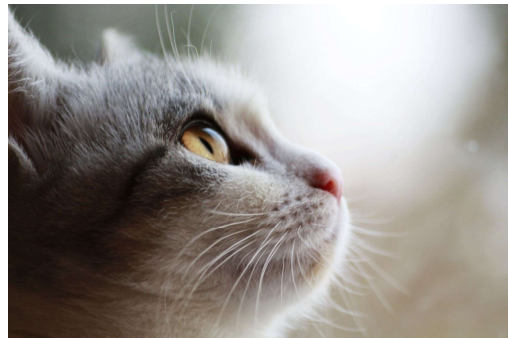
It has two required parts: the intended species and the purpose of the food.

- The intended species identifies the specific animal to which the product is to be fed. For example: dogs, cats, hedgehogs, cockatiels, etc.
- The purpose provides the nutritional function of the food, i.e., nutritional adequacy claim. For example: a complete food is the sole source of nutrition while a treat would be fed occasionally.



# Purpose Statement

- There are 8 options defined for the Purpose Statement.
- The statement must appear in the lower 30% of the Principal Display Panel (PDP) in type that is no smaller than the quantity statement.
- **Model Regulation PF4.** provides specific language and formatting that must be followed **VERBATIM.**



# Purpose Statements – The 8 Options

According to Model Regulation PF4(a)(1) the Purpose Statement must be stated **verbatim** as one of the following:

1. Complete [Species] Food
2. Complete Food for [Blank]
3. Complete [Blank] Food
4. [Species] Food Mixer
5. Veterinary Diet for [Species]
6. [Species] Treat
7. [Species] Food Supplement
8. Daily [Specialty Pet Species] Food



# Complete Food for All Life Stages and Sizes



**“Complete [Species] Food”** is the Purpose Statement used for foods intended to be the complete diet for all life stages and sizes of pets or specialty pets without ANY limitations. This is also known as an unqualified Nutritional Adequacy Claim.

The food is providing a complete diet (sole source of nutrition) for **all** life stages and sizes of the listed species.

**Note: For specialty pets, this Purpose Statement is not allowed, unless there is an AAFCO-recognized nutritional profile.**

# Complete Food for Limited Life Stage(s) or Size

- This Purpose Statement is for foods intended to be the complete diet (sole source of nutrition) for a limited or specific life stage or size of a pet or specialty pet. This is also known as a qualified nutritional adequacy claim.
- The Purpose Statement for these products may be either **“Complete Food for [blank]”** or **“Complete [Blank] Food”** where the blank is filled with one or more of the following:
  - “Adult [Species]”
  - “Puppies,” “Kittens,” or “Juvenile [Species other than dog or cat]”
  - “Puppies (<70 lb. as an adult)”
  - “Dogs (except puppies >70 lb. as an adult)”

**Note: For specialty pets, this Purpose Statement is not allowed, unless there is an AAFCO-recognized nutritional profile.**



## Complete Food for Limited Life Stage(s) or Size



- Example Purpose Statement for puppies less than 70 lbs. as an adult.
- Statement does not have to be in one long line, it may be stacked as in this example.

# Food Mixers

**“[Species] Food Mixer”** is the Purpose Statement to be used for foods intended to top, accompany, or contribute to a complete diet but are not generally intended or represented to be a complete diet.



## Veterinary Diets

For foods intended to be used under veterinary supervision **“Veterinary Diet for [Species]”** is the Purpose Statement to be used.

These foods are available to the consumers only when a relationship with a veterinarian exists, so they are not readily available over-the-counter to consumers.



# Treats

“**[Species] Treat**” is the Purpose Statement required for foods that are given to pets occasionally for enjoyment, training, entertainment, or other purposes.

A treat product is not generally intended or represented to be a complete food or nutritional supplement.



## Food Supplements

These food products are intended to supply specific nutrient(s) or other food components but are **NOT** a complete diet.

They must include the Purpose Statement “[Species] Food Supplement”.

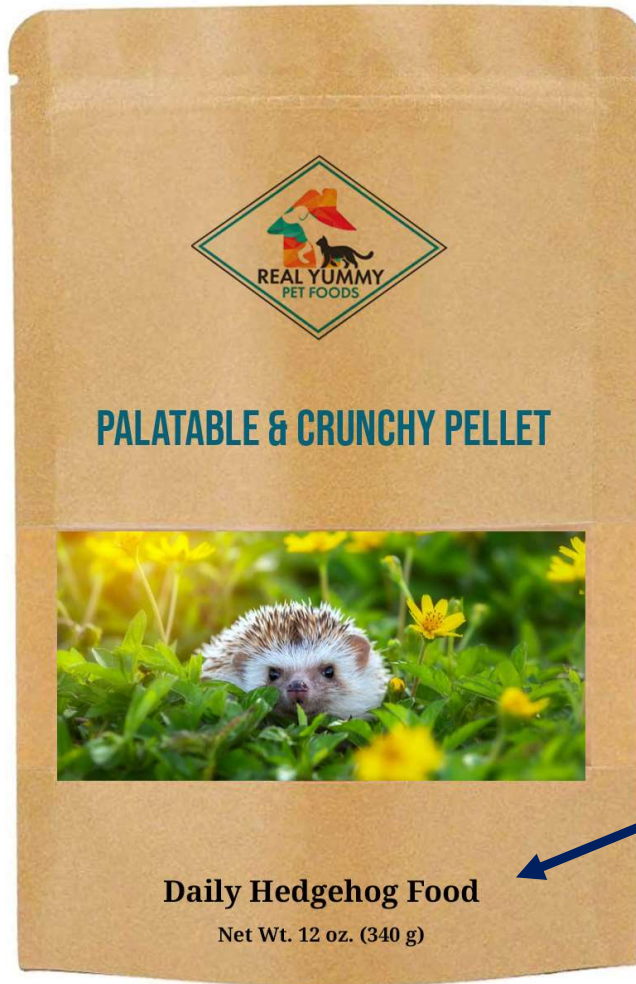


# Specialty Pet Foods

**“Daily [Specialty Pet Species] Food”** is the Purpose Statement for foods that are intended to be the daily diet for specialty pets where no recognized nutritional authority exists.

A limited life stage may be indicated, using the following Purpose Statement:

**“Daily [Specialty Pet Species] Food for [Juveniles or Adults].”**

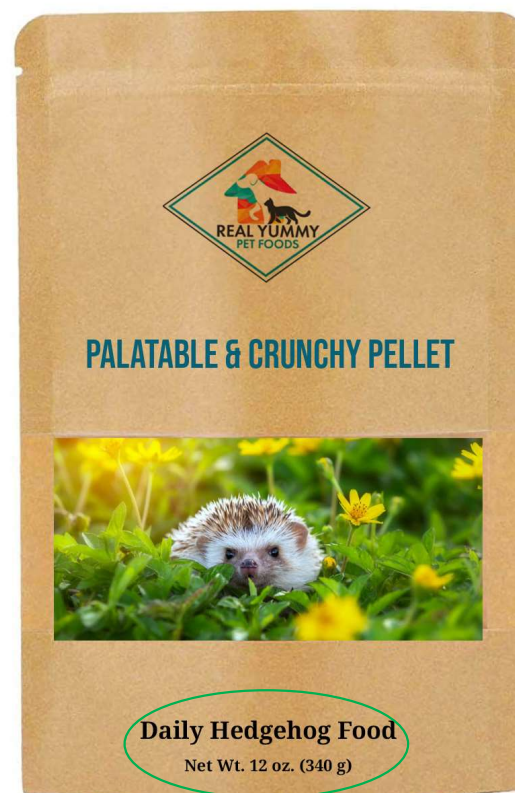


**Note:** An example of an AAFCO-recognized nutritional authority is the National Research Council (NRC). Refer to their publications on nutrient requirements of various animal species.

# Formatting Requirements

According to Model Regulation PF4(a)(2)A, the Purpose Statement must:

- Appear within the **bottom 30%** of the label Principal Display Panel and be repeated on the alternate principal display panel, if present.
- However, on packages having a principal display panel of 5 square inches or less, the requirement for placement within the bottom 30% of the area of the label panel does not apply.



Correct

Incorrect



# Alternate Principal Display Panel

In most cases, the Principal Display Panel is the front of the package. However, some packages might have an alternate Principal Display Panel.

For example, if the package is typically displayed on the store shelf with only the bottom of the package visible to the consumer, such as with larger packages, the information required on the front of the package is also required on the alternate Principal Display Panel.



# Formatting Requirements Continued



Correct

Incorrect

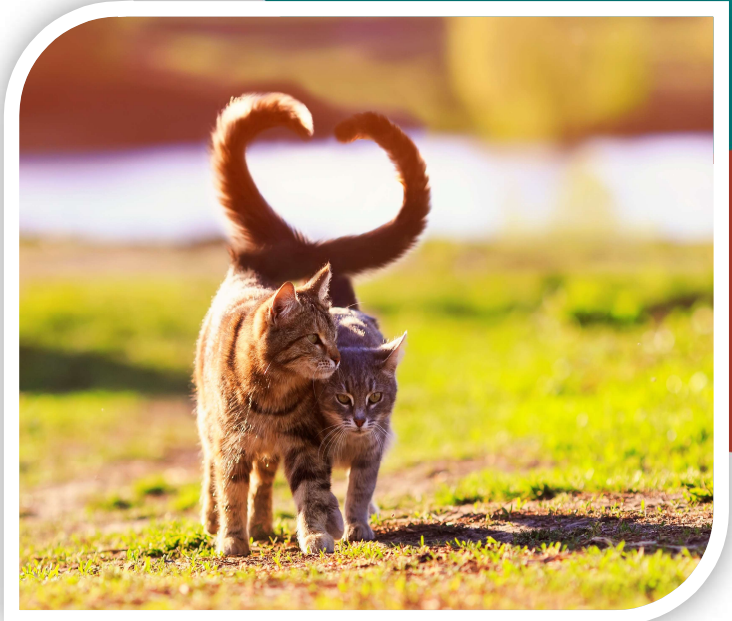
In relation to the net quantity statement, according to Model Regulation PF4(a)(2)B and PF4(a)(2)C the Purpose Statement must ...

- Be at least as large as the net quantity type size
- Appear in the same color and style
- Be on the same background color(s)

# Formatting Requirements Continued

According to Model Regulation PF4(a)(2)D

- The Purpose Statement must be separated by at least a space equal to the height of the letter “N” used in the statement of net quantity from other printed label information appearing above or below it.
- Be at least a space equal to twice the width of the letter “N” of the style of type used in the quantity of contents statement from other printed label information appearing to the left or right of it.



# Nutritional Adequacy **Claim** vs. **Statement**

- The Nutritional Adequacy **Claim** is part of the Purpose Statement and is located on the Principal Display Panel (PDP).
- The Nutritional Adequacy **Statement** as required in Model Regulation PF5(a)(3)F and is typically located at the bottom of the Nutrition Facts Box, depending on the size of the package.
  - For small and very small packages please refer to Model Regulation PF5(f) and (g).



# Definitions

“**Pet**” means dog (*Canis familiaris*) or cat (*Felis catus*).

“**Specialty Pet**” means any animal normally maintained in a household, such as, but not limited to, rodents, ornamental birds, ornamental fish, reptiles and amphibians, ferrets, hedgehogs, marsupials, and rabbits not raised for food or fur.

“**Principal Display Panel**” means the part of a label that is most likely to be displayed, presented, shown, or examined under normal and customary conditions of display for retail sale.

“**Immediate Container**” means the unit, can, box, tin, bag, or other receptacle or covering in which a pet food or specialty pet food is displayed for sale to retail purchasers, but does not include containers used as shipping containers.

# Definitions Continued

**“All Life Stages”** means gestation/lactation, growth, and adult maintenance life stages for dogs, cats, and other mammals or adult (including breeding animals) and juvenile life stages for non-mammalian species.

**“Complete Food”** is a food intended to be the complete diet for all life stages and sizes of pets or specialty pets with an AAFCO-recognized nutritional authority.

**“Daily Food”** means a specialty pet food product, other than a treat, food mixer or food supplement, for specialty pet species with no AAFCO-recognized nutritional authority.



## Definitions Continued

**“Food Mixer”** means a pet or specialty pet food product that is intended to top, accompany, or contribute to a complete diet but is not generally intended to be a complete diet.

**“Food Supplement”** means a pet or specialty pet food product that is intended to supply specific nutrient(s) or other food components but is not a complete diet.

**“Veterinary Diet”** means a pet or specialty pet food product that is intended to be used under veterinary supervision only.

**“Treat”** is a food provided occasionally for enjoyment, training, entertainment, or other purposes, and not generally intended or represented to be a complete food or nutritional supplement.



# 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](#)

