

TAKING THE MYSTERY OUT OF PET FOOD LABELS

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Reading and understanding pet food labels is an important skill for all veterinary technicians to have. Clients often have questions about the food they are feeding their pet or which food would be best for their pet. Veterinary technicians are ideally suited to educate clients and make nutritional recommendations.

Pet Food Governing Agencies and Organizations

Having a basic knowledge of the agencies and organizations that regulate pet foods and pet food labels is the first step to understanding pet food labels.

The Association of American Feed Control Officials (AAFCO)

The Association of American Feed Control Officials (AAFCO) is a private organization but is not a regulatory body. All members of the AAFCO must be state or federal government officials. Pet food companies, pet food trade organizations (the Pet Food Institute for example) and professional organizations (such as the American College of Veterinary Nutrition) cannot be members, but may serve in an advisory capacity to AAFCO committees and investigations. The AAFCO develops model laws and regulations which are often adapted by states. Member government agencies often request assistance from AAFCO when revising existing or developing new regulations and laws. AAFCO also publishes ingredient definitions, official terms, pet food labeling information and standards for pet food testing. AAFCO established the current standards for dog and cat food nutrient profiles including the minimum standards for adult maintenance, growth, and reproduction profiles for both dogs and cats. The organization also set maximum levels for some nutrients in dog and cat foods. Testing protocols for evaluating metabolizable energy and feeding trial guidelines are also published by AAFCO. Many, but not all, states follow model bills and regulations for pet foods established by AAFCO.

The Center of Veterinary Medicine (CVM)

The Center of Veterinary Medicine (CVM), a division of the Food and Drug Administration (FDA), regulates pet food in cooperation with individual states. The FDA is responsible for regulating health claims, ensures food safety, approves food additives, as well as the specifics of some label requirements. The CVM regulates health claims made on pet food labels and product literature. Feed control officials in each state inspect manufacturing facilities and enforce these regulations. Pet food labels are legal documents and governed by the laws of the country the product will be sold in. All pet foods must meet the FDA's requirements and the requirements of the state they are sold in.

United States Department of Agriculture (USDA)

The United States Department of Agriculture (USDA) inspects and regulates animal research facilities and may make unannounced inspections of these facilities. The USDA inspects ingredients used in pet foods to ensure proper handling and is responsible to ensure pet foods

are labeled in a manner that makes it clear the food is intended for animals and not human consumption.

National Research Council (NRC)

The National Research Council (NRC) is a non-profit, non-government organization that evaluates research conducted by other groups and individuals. The NRC published “Nutrient Requirements of Domestic Animals” in 2006 that, in the United States, has been replaced with the AAFCO guidelines. However, these guidelines are still in use in some other countries.

Pet Food Institute (PFI)

The Pet Food Institute (PFI) is a national trade organization whose members include pet food manufacturers and pet food related suppliers. They represent the pet food industry, at the state and federal levels, before regulatory and legislative bodies.

Pet Food Label Requirements

All pet food labels are required to have two main sections, each have legally required components: 1.) the principal display panel, and 2.) the information panel. The FDA definition of the principal display panel is “the part of the label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for retail sale”. The information panel is defined by the FDA as “that part of the label immediately contiguous and to the right of the principal display panel”.

Principal Display Panel

The principal display panel must contain the product name, the species the food is designed for, and the net weight of the food contained in the package. There are specific requirements governing how products are named. If the name of a food is “Chicken for cats”, the food must contain 70% or more chicken as fed. “Chicken dinner”, “chicken platter”, “chicken entrée” must be 25% or more chicken total weight. “With chicken” must be at least 3% chicken. “Chicken flavor” is usually less than 3% chicken. Canned foods may not be greater than 78% moisture. However, foods with “chicken in gravy” or “in sauce” in their name are allowed to have moisture of 78% or more.

The principal display panel may also, and normally does, include the manufacturer's name and the brand name. A product vignette (picture/likeness) may also appear on the label. If a vignette is included, it must not misrepresent the product. Nutritional claims, such as “complete and balanced”, may appear on the principal display panel. All such claims are regulated and are discussed in the nutritional adequacy statement section below. Bursts and flags highlighting improvements, new products, or ingredient changes are allowed. However, the length of time this information is allowed to appear on the label is limited.


The Information Panel

The information panel must include the ingredient statement. Ingredients must be listed in descending order by weight and only standard AAFCO terms may be used.

A guaranteed analysis must be included listing the minimum percentages of crude protein and crude fat and the maximum percentages of crude fiber and moisture. Other nutrients are not required to be listed unless they are highlighted on the label. Nutrients not listed in the AAFCO Nutrient Profile must indicate "not recognized as an essential nutrient by the AAFCO Dog or Cat Food Nutrient Profiles." Ash content is not required, but maximum ash guarantee is allowed. Cat food labels may state "low magnesium" if the maximum level is included **and** if the food contains less than 0.12% on a dry matter basis **and** less than 25 mg per 100 kcal metabolizable energy.

A nutritional adequacy statement must also be listed on all pet food labels except for treats and supplements. Claims such as "complete and balanced" must be substantiated by one of the three methods AAFCO allows to substantiate such claims: 1.) the formulation method, 2.) the feeding trial method, and 3.) the family method.

Dog and cat pet food producers that use the formula method to substantiate the claim a food is complete and balanced must formulate the food to meet AAFCO Food Nutrient Profiles using standard nutrient information about the ingredients the food contains or by having the product analyzed. The formula method does not ensure the availability of nutrients in the food or that the food is palatable. However, it is the easiest, least time consuming, and least expensive method. Foods using this method of validation must state it is "formulated to meet the nutritional levels established by the AAFCO Dog or Cat Food Nutrient Profile for (the life stage it was tested for)" on the product label.



The feeding trial method requires pet food companies to conduct feeding trials, using minimum standards established by AAFCO. All animals in the study are examined by a veterinarian at the start of the study and again when the feeding trial is completed. Participants are also required to have minimum baseline labwork preformed, and body weights recorded weekly. This method may be used to validate that the food meets the requirements for growth, gestation and lactation, adult maintenance, and/or all life stages. The health of the dam at the end of the study and the size and health of the litter are taken into consideration with the gestation and lactation trials. Growth feeding trials must be conducted for a minimum of 10 weeks. The "all life stages" claim may be used when the offspring of a gestation and lactation feeding trial complete a growth feeding trial. Feeding trials for adult maintenance claims must be conducted for at least 26 weeks. The majority of nutritional deficiencies, if any, should be detected using this method of validation. However, nutrient excesses might not be evident during this timeframe. "Animal feeding tests using AAFCO procedures substantiate that (name of food) provides complete and balanced nutrition for (the life stage it was tested for)" is listed on the label of foods that have passed feeding trials. The feeding trial method is much more expensive and time consuming to conduct. It is generally considered the preferred method to substantiate nutritional adequacy claims.

The less common method of substantiating a food claim is the family method. Foods using this method must be in the same product line and be the same processing type (dry, canned, etc.) as a food tested using the feeding trial method. When analyzed, crude protein, calcium, phosphorus, zinc, lysine, and thiamin (as well as taurine and potassium for cat foods) must meet the levels of the food validated by feeding trials or the minimums established in the AAFCO Dog or Cat Food Nutrient Profiles for all nutrients. Products using this method must state “provides complete and balanced nutrition for (life stage), and is comparable in nutritional adequacy to a product which has been substantiated using AAFCO feeding test” on the label.

Treats and supplements are not required to include a nutritional adequacy statement on their label. Foods that do not meet AAFCO standards must be labeled “This product is intended for intermittent or supplemental feeding only.” Veterinary therapeutic diets should be labeled “use only as directed by your veterinarian.” These products must also list an AAFCO life stage nutritional adequacy statement or “this product is intended for intermittent or supplemental feeding only” on the label.

Feeding guidelines must be included on all dog and cat food labels, except veterinary therapeutic diets. These guidelines must be listed in common terms (for example a x pound cat, x cups of diet). These are only guidelines which are generally based on standard maintenance energy requirement (MER) equations with a safety margin. Actual amounts to feed should be calculated using one of several established methods and adjusted based on the pet's body condition. However, it is important to note that pets consuming less than 80% of the recommended amount for their ideal weight may be consuming inadequate nutrients. These pets should be transitioned to a less caloric dense food.

The calorie content of dog and cat foods is not required to be listed on the label unless a claim of “light” or “less calorie” is listed on the label.

Manufacturer, distributor, or importer name and address must also be included. The company's phone number and website are not required to be listed on the label, but may be included. A company that manufactures and distributes dog and cat food may state “manufactured by” on the label. Some companies have their foods manufactured by another company; these foods must state “manufactured for”, “imported by”, “distributed for” on the label. Foods not made in the United States must state “product of” on the label.

Universal Product Code (UPC), batch numbers, date of manufacture, and best used by date may also be included on the information panel.

References

Small Animal Clinical Nutrition, 5th Edition, Hand, Tharcker, Remillard, Roudebush, Novomy