



NASC Pet Food Label Modernization Training

Presented by the NASC Compliance Team

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NASC PFLM TRAINING WEBINAR

February 29, 2024

Agenda

Welcome and Introductions – Bill

Brief Background – Jennifer

Key Label Changes

- Intended Use Statement – Jennifer

- Nutrition Facts Box – Miriam

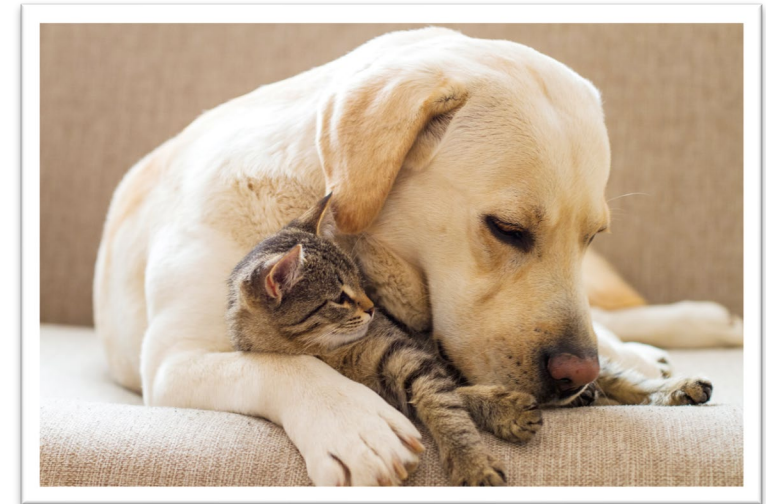
- Ingredients – Katie

- Feeding Directions – Katie

- Handling and Storage – Katie

Implementation – Ryan

Resources – Ryan



What is AAFCO?

The Association of American Feed Control Officials (AAFCO) is a non-profit association of local, state, federal and international agencies who are charged by law to regulate the sale and distribution of animal feed and pet food (including food supplements) in the United States.



One significant role that AAFCO plays is to develop model regulations. Most States adopt the model regulations as their own state feed law and regulations. The intent of having this process in place is to have consist requirements from state to state.

What is NASC's Role with AAFCO and the Pet Food Modernization Label (PFLM) Project?

Changes made to the Pet Food Model Regulations affect NASC members who market food supplements. Consequently, being an active partner with AAFCO is essential. Currently, Bill Bookout and Jennifer Gornnert serve on the AAFCO Pet Food Committee and have been engaged with the PFLM project. As the leading expert on animal supplements, it is critical that the NASC team provides accurate, helpful guidance to NASC members. Today's webinar, and the variety of guidance documents available on our website, are examples of how NASC provides ongoing support to our members.



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Pet Food Label Modernization (PFLM)

Why Change the Label?



- Consumers are concerned about what they purchase for their pets. When surveyed, they asked for labels that are easier to understand to make an informed purchase decision.
- In 2015, AAFCO initiated the Pet Food Label Modernization (PFLM) project to update regulations for pet food labeling to improve consumer understanding.
- One goal of the new labeling requirements was to more closely align pet food labels with human food labeling, and to require consistent placement of specific information.

Please Note

PFLM applies to all **pet** & specialty pet foods including complete food, treats, food mixers, **food supplements** and veterinary diets.

- NASC only works with animal supplements; **food supplements** and health supplements.
- AAFCO defines **pet** as dog and cat. Note, these label changes do not apply to horse feed products, including horse food supplements.
- AAFCO defines **food supplement** to mean “food products for pets or specialty pets that are intended to supply a specific nutrient(s) or other components but are not a complete diet.”

**Our focus today is on how the changes affect labeling
Food Supplements intended for dogs and cats.**



**Model Regulation PF4.
Intended Use Statement and
Nutritional Adequacy Claims**



Intended Use Statement (PF4)

One new requirement is to state the intended use of the product.

The Intended Use Statement must include the intended species and the intended nutritional purpose of the food. The statement is required to be placed on the lower third of the front panel.

Why the New Requirement?

When a consumer reviews pet food products, they typically begin by reading the front label. By requiring the **Intended Use Statement** to be on the front panel it clearly informs the consumer to the proper use of the product.



Intended Use Statement (PF4)

Depending on the purpose of the pet food product, the new regulation requires one of the following **8 Intended Use statements** to be on the front panel of the pet food label:

1. Complete [Species] Food
2. Complete Food for [Life Stage]
3. Complete [Life Stage] Food
4. Veterinary Diet
5. [Species] Treat
- 6. [Species] Food Supplement** (for NASC members)
7. [Species] Food Mixer
8. Daily [Specialty Pet Species] Food

All animal supplements intended to provide supplemental nutrients are considered **food supplements** and must include the intended use statement, “[**species**] **Food Supplement**” verbatim. Which means, there are 3 options for food supplements: “Dog Food Supplement”, “Cat Food supplement”, or “Dog & Cat Food Supplement”.



Intended Use Statement (PF4)

Formatting Details—

- The intended use statement must be placed on the bottom third of the principal display panel (PDP).
- In relation to the net quantity statement, the Intended Use Statement must be:
 - ✓ Equal to or greater than the type height,
 - ✓ Appear in the same color and style, and
 - ✓ Be on the same background color.
- The intended use statement must be distinct and separate from other information.



Nutritional Adequacy Claims (PF4)

Also new, is including the **Nutritional Adequacy Claim** on the front panel. The nutritional adequacy claim refers to the nutrient content of the pet food as it relates to the life stage of the animal, such as adult, puppies, or kittens. The Nutritional Adequacy claim only applies to **complete diets** and **does not apply to food supplements**.

For Food Supplements, the existing **language for the Nutritional Adequacy Statement** **has not changed**. However, the new regulation requires that it **must be included** and be located at the bottom of the new Pet Nutrition Facts Box.

Meaning, the nutritional adequacy statement, **“This product is intended for intermittent or supplemental feeding only”** must be consistently located in the Pet Nutrition Facts Box of **all** pet food supplement labels.



Model Regulation PF5. Pet Nutrition Facts Box

Pet Nutrition Facts Box (PF5)

Why?

- The intent is to present the nutrients in a format that is more understandable to the consumer.
- The Guaranteed Analysis section of the label was updated to more closely resemble human food labeling.

What hasn't changed?

- A guarantee of nutrients provided
 - ✓ A maximum Moisture guarantee is required on all pet food products
- The guaranteed nutrients will still be listed in the order per the Nutrient Profiles for dogs and cats
 - ✓ Denoting non-essential nutrients with an asterisk
 - ✓ This is anything not listed in the Nutrient Profiles
 - ✓ When required an explanation of enzyme activity units will continue to follow the non-essential nutrient disclaimer
- A calorie content statement.
- A nutritional adequacy statement.

Pet Nutrition Facts Box (PF5)

What Changed?

- The Addition of the Pet Nutrition Facts Box
 - ✓ Calories are now included in the Nutrition Facts box, and a breakdown of calorie content from protein, fat and carbohydrates.
 - ✓ Nutrients are stated per familiar household unit (e.g., tablet, scoop, soft chew).
 - ✓ Total Carbohydrate and Dietary Fiber guarantees will replace the Crude Fiber guarantee to provide a better measure of fiber.
 - ✓ The nutritional adequacy statement is now required in the bottom of the nutrition facts box.
 - ✓ Previously, nutrient quantities were stated in percentages. The new requirements require listing the amount of each nutrient per the appropriate unit of measure (e.g., g, mg, IU, CFU etc.).

Pet Nutrition Facts Box (PF5)

Original Label

GUARANTEED ANALYSIS:

Crude Protein (min): 26.0%
Crude Fat (min): 18.0%
Crude Fiber (max): 9.0%
Moisture (max): 8.0 %

Calorie Content (ME, calculated):

3850 kcal/kg, 376 kcal/cup

Nutritional Adequacy Statement

This product is intended for intermittent or supplemental feeding only

New Label

Pet Nutrition Facts

1 soft chew = 8 grams

Calories per soft chew*: 110

From: Protein 42, Fat 36, Carbohydrate 32

Nutrients	Per soft chew
Moisture (max)	5 g
Eicosapentaenoic acid (min)	14 g
Calcium (min)	6 mg
Zinc (min)	7 mg
Vitamin A (min)	10 IU
Omega-6 fatty acids*	2.5 g
Lactobacillus acidophilus*	3 Million CFUs

*Calculated value

*Not recognized as an essential nutrient by the AAFCO Dog [or cat] Food Nutrient Profiles.

This product is intended for intermittent or supplemental feeding only

Source: AAFCO, PFLM Label Comparison, www.aafco.org/wp-content/uploads/2023/10/AAFCO-PFLM-Label-Comparison-Worksheet-Final-July-2023.pdf



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Pet Nutrition Facts Box (PF5)

Breakdown on the Pet Nutrition Facts Box

1. “**Pet Nutrition Facts**” is the required header and must be twice the size of all other text.
 - All other text included is the same size font.
2. The weight in grams will now be stated with the unit consistent with the feeding directions.
3. The total calorie content must now be listed in the Facts Box.
 - It must be stated in the same unit consistent with the feeding directions.
 - Then below the total content, calories from protein, fat, and carbohydrate must be listed.
4. All nutrients that support the intended use must be claimed.
 - For specific guidance for order of nutrients, please refer to the AAFCO OP
 - The addition of new headers for these guarantees now includes “Nutrients” and “Per [the Unit]” consistent with the feeding directions.
5. Under the nutrient guarantees there is now a Footnote section.
 - † will indicate the calorie content value is calculated.
 - * will indicate the non-essential nutrients being guaranteed.
6. The Nutritional Adequacy statement will now be included in the Facts Box.
 - For Food supplements the statement will always be “***This product is intended for intermittent or supplemental feeding only***”.

Pet Nutrition Facts	
1 soft chew = 8 grams	
Calories per soft chew†: 110 From: Protein 42, Fat 36, Carbohydrate 32	
Nutrients	Per soft chew
Moisture (max)	5 g
Eicosapentaenoic acid (min)	14 g
Calcium (min)	6 mg
Zinc (min)	7 mg
Vitamin A (min)	10 IU
Omega-6 fatty acids*	2.5 g
Lactobacills acidophilus*	3 Million CFUs
†Calculated value *Not recognized as an essential nutrient by the AAFCO Dog [or cat] Food Nutrient Profiles.	
This product is intended for intermittent or supplemental feeding only	



Model Regulation PF6. Ingredient Statement

Ingredient Statement (PF6)

The ingredient section was updated to clarify several areas

What's New?

1. Vitamin & Mineral Premixes (PF6a2)

- In the past, States have used enforcement discretion to allow the listing of vitamin and mineral premixes in order of predominance rather than separating the components and listing those in order of predominance.
- PFLM, specifically **PF6a2** puts in writing that listing the vitamin and mineral premixes in order of predominance is an allowable practice. The vitamins or minerals in the premix must be listed parenthetically in their order of predominance e.g., Vitamins (Vitamin E Supplement, Niacin, Biotin, Thiamine Mononitrate), Minerals (Zinc Oxide, Manganese Sulfate, Copper Sulfate).
- **Table 90.27** has been added to provide options for consumer recognized names in the ingredient statement. For example:
 - 90.25 Vitamin A Acetate can now be listed as Vitamin A (Vitamin A Acetate)
 - 90.25 Folic acid can now be listed as Vitamin B9 (Folic acid)

Ingredient Statement (PF6)

What's New?

2. Common or Usual Names (PF6a3)

- The new Common Food Index was created to provide clarity on what commonly used ingredients are allowed, and how they should be listed, when there is no official AAFCO definition for them.
- The Common Food Index is posted on the AAFCO website.
<https://www.aafco.org/about/committees/ingredient-definitions/common-food-index/>

3. Ingredients with a standard of identity (PF6a4)

- **PF6a4** puts in writing that any ingredient with a standard of identity (per Title 9 or 21 of the Code of Federal Regulations) must list the name of the standardized ingredient followed by the parenthetical list of its ingredients, if applicable. For example:
 - Peanut butter (peanuts, salt, palm oil)
 - Cheese (milk, salt, enzymes, annatto color)

Ingredient Statement (PF6)

What's new?

4. Naming of Fish ingredients (**PF6a6**)

- The following options are acceptable:
 - Fish
 - A descriptive name which could apply to multiple species (e.g. ocean whitefish)
 - The acceptable market or common name established in the FDA Seafood List (e.g., Alaska Cod, Pink Salmon).

5. Sugar (**PF6a7**)

- In the past, States have used enforcement discretion to allow the listing of 'sugar' which is not a defined ingredient.
- PFLM, specifically **PF6a7** puts in writing that 'sugar' may be used in the ingredient statement when referring to sucrose obtained from sugar cane or sugar beets.

Ingredient Statement (PF6)

What's new?

6. Organic (PF6d)

- **PF6d** clarifies in writing that 'organic' does not constitute a quality or grade claim (PF6c) and is allowed as long as the term is used per USDA National Organic Program (7 CFR Part 205)

Ingredient Statement (PF6)

What hasn't changed?

- ✓ The names of all ingredients in the ingredient statement shall be shown in letters or type of the **same size, style, and color (PF6a1)**
- ✓ The ingredients shall be listed in descending order of predominance by weight in non-quantitative terms **(PF6a2)**
- ✓ Ingredients must be listed by the AAFCO defined name **(PF6a3)**
- ✓ Brand or trade names shall not be used in the ingredient statement **(PF6b)**
- ✓ References to the quality or grade of an ingredient shall not appear in the ingredient statement (e.g., prime beef, wild Alaskan salmon oil) **(PF6c)**



Model Regulation PF8. Feeding Directions

Feeding Directions (PF8)

- ✓ A **food supplement** must list feeding directions that, at minimum, include the quantity of feeding unit per weight of animal (e.g., 1-20 lbs., 1 soft chew; 21 -40 lbs., 2 soft chews).
- ✓ The frequency of feeding must be specified (e.g., once per day)
- ✓ The unit used in the feeding directions must be consistent with the Nutrition Facts Box unit of measure (e.g., tablets, capsules, or soft chew).

Model Regulation PF12. Handling & Storage Instructions



Handling & Storage Instructions (PF12)

- Handling & Storage instructions are optional; however, if present, you must meet the following requirements:
 - ✓ Bolded header must say: “**Handling and Storage Instructions**”.
 - ✓ The header is separate and distinct from the feeding directions.
 - ✓ The instructions must be easily read under typical conditions of use.
 - ✓ If a graphic is used, you must use one of the AAFCO approved graphics AND the accompanying text must be included.
 - ✓ The graphics are available on the AAFCO website.



Source: AAFCO, Ingredient Statement and Handling & Storage Instructions, <https://www.aafco.org/wp-content/uploads/2023/10/AAFCO-PFLM-Handling-One-Page-Final-July-2023.pdf>

Implementation

- Each state has its own process on how these regulations may be adopted within their own state.
- AAFCO is recommending each state exercise regulatory discretion for 6 years.
- AAFCO will be reassessing the discretionary period at the AAFCO annual meetings based on state and industry progress.
- Most states will exercise regulatory discretion, but some states may not follow this approach. It is up to each company to determine when to implement these changes. However, until NASC can determine all states are exercising regulatory discretion, our recommendation is for members to delay implementing these changes.

Next Steps & Important Notes

- Familiarize yourself with the new requirements right away and determine when it makes sense for you to implement.
- We recommend you purchase the new 2024 AAFCO Official Publication (OP) and visit the AAFCO website for all the PFLM updates.
- Keep in mind, once you start the transition you cannot use both the old and new requirements on the same label.
- For our retail and veterinarian partners, AAFCO will have educational resources on the new label changes.
- There will also be presentations at Global Pet Expo for PFLM Review and other AAFCO initiatives.

Resources



- www.aaftco.org/pflm
- The 2024 AAFCO Official Publication
- The Pet and Specialty Pet Food Labeling Guide
- Your State Feed Control Official
- AAFCO will have ongoing Education & Outreach



- www.nasc.cc
- NASC Labeling webpage section (for NASC Members)
- NASC Annual Conference – anyone can attend
- NASC Compliance Team can help with questions
- Email directly to compliance@nasc.cc



Questions?

Email the NASC Compliance Team

compliance@nasc.cc

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