



RESEARCH & DEVELOPMENT - TECHNICAL POSITION PAPER

The Modernization of Pet Food Labels

Leading with Technical Expertise - White Paper
Leah Lambrakis & Amanda Boecker, Department of Technical Services

What is PFLM?

Since 2015, the Association of American Feed Control Officials (AAFCO) and industry stakeholders have been working to create a proposed update to pet food labels so that they provide better clarity for the pet parent. This initiative, called the Pet Food Label Modernization (PFLM) was voted in at the AAFCO annual meeting in August 2023 with a recommended transition period of six years for pet food companies to update the label and packaging changes to their products.

What is Changing?

The scope to modernize pet food labels is to better communicate important information about nutritional content, the intended use of the product, declare clearer and consistent ingredient listings and include optional visual instructions for handling and storage. The changes are intended to provide an easier comparison of products, using a consistent format. Let us explain a little further.

Nutrition Facts Box

The product's nutritional information will all be contained in a "Facts Box", closely resembling the labeling style on human food packaging. The changes to the nutritional content include (1) expanded caloric information displaying the caloric distribution from protein, fat and carbohydrate, (2) nutrient content by common household serving sizes, (3) total carbohydrates will be added as a new guaranteed analysis, and (4) total dietary fiber (TDF) will replace crude fiber. Additionally, the Nutritional Adequacy statement (also referred to as the AAFCO statement) will appear in the Facts Box so that the statement is in a consistent location for all pet food labels.

Intended Use

The <u>Intended Use Statement</u> and Nutritional Adequacy Claim will now be located on the lower-third of the principal display panel to

Pet Nutrition Facts		
1 cup (8 oz standard measuring cup)= 80 g		
Calories per cup [†] : 310 From: Protein 73, Fat 123, Carbohydrate 113		
Nutrients	Guarantee	per cup
Protein (min)	26.0%	21 g
Fat (min)	18.0%	14 g
Total Carbohydrate† (max)	42.0%	39 g
Dietary Fiber (max)	9.0%	8 g
Moisture (max)	8.0%	6 g
[†] Calculated value		
Real Yummy Lamb and Rice Recipe Complete Adult Dog Food is formulated to meet the nutritional levels established by the AAFCO Dog Food Nutrient Profiles for maintenance.		

(Image courtesy of AAFCO)

easily identify the intended life stage and purpose of the pet food or specialty pet food. This includes complete foods, treats, toppers, supplements and veterinary diets. These approved statements are specifically outlined within the regulations.





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Ingredient Statement

The <u>Ingredient Statement</u> regulations have been updated to now use consistent terminology and allow parentheticals and common or usual names for vitamins. Several changes are specific to the naming conventions of meat, fish, and poultry, in addition to the sources of sugar. While the names of ingredients are still to be in the same size, style and color font, the scientific names of microorganisms may now be italicized. In addition, organically produced ingredients may be identified as organic in the ingredient statement or with an asterisk, which is defined below the ingredient statement to indicate the ingredient is organically produced.

Handling & Storage Icons

An optional addition to pet food labels will be the <u>Handling and Storage</u> instructions. These can be in written or graphic form, however only the graphics shown below may be used with specific regulations around the positioning and labeling of these instructions on the packaging.







portions or







dry place



(Image courtesy of AAFCO)

Six Years – That is Plenty of Time!

We would challenge that it is not if we consider all that needs to be accomplished. A significant amount of planning is required in order to appropriately launch the revised labels and associated packaging to the market, for every single pet food product sold. First, a technical data gathering phase is needed in order to accurately declare the new guaranteed analyses for total carbohydrate and total dietary fiber. AAFCO has appropriately estimated years one and two as "Foundational Preparation and Technical Readiness". This phase includes acquiring laboratory data and subsequent validation, the revision to each formula's nutrient predictions, and the refresh of every product's label declaration. Years three through five includes "Creative Revisions and New Packaging Introduction", which will cover artwork creation, the procurement of new packaging materials, inventory management of current packaging, product registration and the final launch. In the 5th year, 2029, there will be





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a final review phase that will determine if the industry is on track for coming into force by year 6, or if this needs to be extended or revised. This entire process will require a high level of organization, project management and communication.

Fortunately, AAFCO will be providing <u>resources</u>, regulator and manufacturer training opportunities and materials, and information for pet owners as the new label and packaging requirements are being implemented. In addition, there will be an annual review of the status, with a 60-day period for comments, around the AAFCO annual meeting in order to identify and elevate issues and bottlenecks.

What is Simmons Pet Food's Plan?

Today we are getting organized and have already been deep into the data gathering phase. We have completed a significant number of analyses for Total Dietary Fiber (TDF) across over 100 fiber contributing ingredients in our portfolio. This will allow us to develop strong predictions for TDF across all of the formulas we produce. We have also begun testing our finished products in order to validate that the nutrient predictions align with laboratory analyses before we declare a TDF maximum level on the label declaration. As we progress further into this initiative, we will be collaborating with our customers to develop a project plan for an effective and efficient roll-out of the PFLM initiative, while being keenly aware that these updates will be balanced with other projects. Stay tuned!

Our Commitment – Leading with Technical Expertise – our technical experts are here to provide guidance and insights – do not hesitate to connect with us at Simmons Pet Food, *pfcomments@simfoods.com*. We would love to hear from you and be part of your pet's nutrition solution!

Literature Referenced

1. AAFCO. "Introducing the New Model Pet Food and Specialty Pet Food Regulations". https://www.aafco.org/pflm. Accessed October 16, 2023.