

What You Can and Can't Learn from a Pet Food Label

Angela Witzel, DVM, PhD, DACVN

Regulation of Pet Food in the US

- 1) AAFCO (Association of American Feed Control Officials)
 - a. Sets nutrition standards and “model” regulations
- 2) FDA (Food and Drug Administration)
 - a. Specifies some label requirements, regulates health claims and ensures safety
- 3) USDA (US department of Agriculture)
 - a. Regulates ingredients and inspects research facilities
- 4) State Department of Agriculture
 - a. Enforces animal food regulations

Pet Food Definitions

- 1) "Natural" - legally defined and requires a pet food to consist of only natural ingredients without chemical alterations, except for vitamins, minerals and other trace nutrients
- 2) "Organic" - legally defined for human foods by the USDA. Pet food companies can currently use the term "organic" if they follow the same rules as applied to human foods.
 - a. Natural and organic are not interchangeable terms
- 3) "Holistic" - no legal definition and unregulated. Any pet food could use the term "holistic" in marketing their product.
- 4) "Human grade" - not an allowed term on a pet food label, unless the food is made in a plant approved for manufacturing human food.
 - a. Very few pet foods can be labeled "human grade"
 - b. Regulation doesn't apply to advertising and websites, so some pet food companies will tout "human grade" ingredients in their products
- 5) There are no definitions for
 - a. high quality ingredients
 - b. Super premium
 - c. Hypoallergenic
 - d. High meat
 - e. High digestibility

Information on a pet food label

- 1) Principal display panel
 - a. Product name (statement of identity)
 - b. First part of label noticed by customer and a key factor in purchase
 - c. Many consumers purchase a product based on presence of a specific ingredient; therefore, many product names incorporate the name of an ingredient to highlight its inclusion
 - d. Species for which it is intended to be fed to – “dog” or “cat”
 - e. Net weight of product – not standardized
 - i. E.g. cans may contain 3.5 oz, 5 oz, 5.5 oz, 8.5 oz, 12.5 oz, or 15.5 oz
 - ii. In order to make a cost comparison, look at actual weight of product

f. May also include a vignette – marketing tool

2) Information Panel

a. Ingredient lists

- i. Contains added ingredients but do not contain all nutrients.
- ii. In descending order by weight
 1. Wet ingredients contribute more water and less nutrients
 2. Dry ingredients contribute more nutrients and less water
- iii. Ingredient definitions
 1. “Poultry by-product meal” – ground, rendered, clean parts of the carcass such as necks, feet, undeveloped eggs, and intestines. Excludes feathers.
 2. “Meat by-products” – non-rendered, clean parts, other than meat, derived from slaughtered mammals. Includes, but not limited to, lungs, spleen, kidneys, brain, livers, blood, bone, fatty tissue, stomachs and intestines freed from their contents. Does not include hair, horns, teeth, and hoofs.

b. Guaranteed Analysis

- i. State legal tolerance levels
- ii. Not actual concentrations of nutrients
- iii. Only 4 of some 35+ required nutrients are on the label
- iv. Listed on an “as fed” (AF) basis. When comparing different foods, need to convert to a “dry matter” basis (DMB). For example a canned food that contains 80% moisture will appear to have lower levels of protein than a dry food containing only 10% moisture.

c. Nutritional Adequacy Statement should state the following:

- i. Species (dog or cat)
- ii. Lifestage (growth, maintenance or reproduction)
- iii. AAFCO validation method
 1. *Nutrient Profile Comparison:*
 - a. Pet food contains ingredients formulated to provide levels of nutrients that meet AAFCO nutrient profiles for dogs or cats (and lifestage(s))
 - b. This means the nutrient profiles were calculated from the ingredient list or a chemical analysis of the food was done
 - c. These results were compared to the AAFCO profiles for the species and lifestage(s)
 - d. Wording: “Product X is complete and balanced for dogs/cats in Y lifestages using AAFCO testing procedures”
 2. *Feeding trial:*
 - a. The product or lead member of a family of products has been fed to dogs or cats for 1 or more lifestages under strict guidelines and found to meet a minimal standard

- b. Wording: “Product X is complete and balanced for dogs/cats in Y lifestages using AAFCO feeding protocols”
 - c. Feeding trials are best method because this means the food was actually fed to living animals prior to marketing and sale
 - d. Product Family Criteria - Depends on one product passing feeding trials. Lead product family member must pass feeding trial. Other family members can then be listed as passing a feeding trial if they are:
 - i. Comparable in energy density
 - ii. Meet the lead product in “key nutrients”
 - iii. Meet the lead or AAFCO profile (whichever is lower) for other nutrients
 - iv. NO restrictions on ingredient substitutions!
- iv. For supplemental feeding only
- d. Feeding Guidelines
 - i. Must be included
 - ii. Tend to overestimate the amount of food needed
 - iii. Calorie content is now required, but will take several years to phase into all labels

Pet Food Quality Control – Not required or regulated!

- 1) Need to control quality and source of raw ingredients
 - a. Should have specific requirements for suppliers to meet
 - i. Nutrient composition
 - ii. Purity
 - iii. Analytical criteria
 - iv. Shipping conditions
 - b. Manufacturers should do the following
 - i. Store ingredients properly
 - ii. Have internal and external auditing of facilities
 - c. Vendors that supply raw ingredients should test nutrient levels, do microbial evaluations, and test for toxicity
- 2) Suggested questions to ask pet food companies
 - a. Do you have a veterinary nutritionist or some equivalent on staff in your company? Are they available for consultation?
 - b. Who formulates your diets and what are their credentials?
 - c. Which of your diets are AAFCO Feed Trial tested? Which of your diets have been AAFCO Nutritional analyzed?
 - d. What specific quality control measures do you use to assure the consistency and quality of your product line?
 - e. Where are your diets produced and manufactured?
 - f. Can you provide a complete product nutrient analysis and digestibility results of your bestselling canine and feline foods?