

# Pet Food Labels

This document is for guidance purposes only and does not constitute legal advice. It is the responsibility of the commercial feed manufacturer/distributor to ensure they are in compliance with the applicable laws and requirements. Following the guidance in this document does not preclude regulatory or compliance action by the Wisconsin Department of Agriculture, Trade, and Consumer Protection when authorized by state law, nor does it release any commercial feed manufacturer or distributor from legal responsibility or liability of any kind.

Pet food labels give the consumer basic information about the ingredients, nutritional value, and the type(s) of animals for which the product is intended. Using the label, consumers can compare different animal feeds (pet foods) that are available to decide which product will best suit their animal's needs.

The Department of Agriculture, Trade and Consumer Protection (DATCP) regulates pet food in Wisconsin. DATCP's pet food regulations are based on rules created by the Association of American Feed Control Officials (AAFCO). AAFCO is an organization of federal and state feed control officials.

Every label is required to have specific items:

- (a) The words "Dog Food" or "Cat Food" or "Dog Treat" or "Cat Treat," on the principal display panel<sup>1</sup> of the product. (Wis. Admin. Code §ATCP 42.28(1)(a).)
- (b) The product name and the brand name if any. (Wis. Admin. Code §ATCP 42.28(1)(b).)
- (c) A guaranteed analysis. (Wis. Admin. Code §ATCP 42.28(1)(c).)
- (d) An ingredient statement. (Wis. Admin. Code §ATCP 42.28(1)(d).)
- (e) Drug (medication) information, if the feed contains one or more drug(s). *Please contact the Department directly if you have questions about medicated dog or cat food*. (Wis. Admin. Code §ATCP 42.28(1)(e).)
- (f) A statement of nutritional adequacy, if required. (Wis. Admin. Code §ATCP 42.28(1)(f).)
- (g) The name and principal mailing address of the manufacturer responsible for distributing the food. (Wis. Admin. Code §ATCP 42.28(1)(g).)
- (h) A declaration of net quantity on the principal display panel, in both metric and inch-pound ("U.S.") units. (Wis. Admin. Code §ATCP 42.28(1)(h).)
- (i) Feed instructions, if required. (Wis. Admin. Code §ATCP 42.28(1)(i).)

The rest of the packaging is not regulated as the label, it is regulated as labeling (advertising). The label claims<sup>2</sup>, pictures and printing may not be false, deceptive, or misleading.

<sup>&</sup>lt;sup>1</sup> "Principal display panel" is the package panel or the side of the package that the consumer will see first when they look at the product.

<sup>&</sup>lt;sup>2</sup> Label claims are statements on the label that make some claim about the product. These claims may be related to a special function of the feed, calorie content or a specific product performance or benefit.

#### PRODUCT NAME

(REFERENCE WIS. ADMIN. CODE §ATCP 42.42)

Beef Dog Food Dog Food with (Most Beef) Beef Beef

Beef Flavored (Least Beef)

The name of the product describes the major composition of the pet

food. For example, "Beef Dog Food" must contain 95 percent beef, but "Beef Flavored" dog food must only have a recognizable beef flavor. It's possible then that "Beef Flavored" dog food may not contain any beef. Most products fall within the range of these two descriptions.

#### **GUARANTEED ANALYSIS**

(REFERENCE WIS. ADMIN. CODE §ATCP 42.30)

The dog or cat food manufacturer must guarantee that the pet food contains a specific level of each of the following:

- A minimum guarantee for crude protein (%)
- A minimum guarantee for crude fat (%)
- A maximum guarantee for crude fiber (%)
- A maximum guarantee for moisture (%)
- If the label states "vitamin-enriched" or "contains minerals," the level of specific vitamins and/or minerals must also be guaranteed.
- On canned pet food, the guarantees appear lower than dry food labels due to the water content.

#### **INGREDIENT STATEMENT**

#### (REFERENCE WIS. ADMIN. CODE §ATCP 42.32)

Pet food ingredients must be listed in the ingredient statement by descending order of predominance by weight. In addition, ingredients must be listed by their "common or usual name" (e.g. apples or salt) or their official name as per the Association of American Feed Control Officials (AAFCO) Official Publication (OP)<sup>3</sup>.



#### STATEMENT OF NUTRITIONAL ADEQUACY

(REFERENCE WIS. ADMIN. CODE §ATCP 42.32)

The label must identify one or more life stages<sup>4</sup> the food can adequately sustain, and the formula or recipe for the food must be based on the minimum nutritional requirements for essential proteins, amino acids, minerals and vitamins, for that (those) life stage(s). These minimum requirements were developed by the members of AAFCO, in consultation with animal nutritionists.

The statement of nutritional adequacy must be one of the following:

- Puppy or kitten growth and development,
- Breeding or lactating adult dogs or cats, or
- Maintenance of adult dogs or cats;
- A product may also be formulated to meet all life stages.

#### **EXAMPLE GUARANTEED ANALYSIS**

<sup>&</sup>lt;sup>3</sup> The AAFCO OP is updated annually and is available for purchase online, <u>http://www.aafco.org</u>. <sup>4</sup> Example life stages:

- "[Name of product] is formulated to meet the nutritional levels established by the AAFCO [Dog or Cat] Food Nutrient Profiles for [specify the life stage(s), such as gestation/lactation, growth or maintenance, for which the dog or cat food is intended, or specify "all life stages"]." For a dog food, when the blank includes the words "Growth" or "All Life Stages," one of the following phrases must also be added verbatim to the end of the claim:
  - "including growth of large size dogs (70 lb. or more as an adult)" if the product has been formulated to meet the levels of nutrients specifically referenced in the Dog Food Nutrient Profiles as being applicable to large size growing dogs.
  - "excluding growth of large size dogs (70 lb. or more as an adult)" if the product has been formulated to meet the levels of nutrients specifically referenced in the Dog Food Nutrient Profiles as being applicable to large size growing dogs.
- "Animal feeding tests using AAFCO procedures substantiate that [name of product] provides complete and balanced nutrition for [specify the life stages, such as gestation, lactation, growth or maintenance, for which the dog or cat food is intended, or specify "all life stages"]."
- "This product is intended for intermittent or supplemental feeding only."

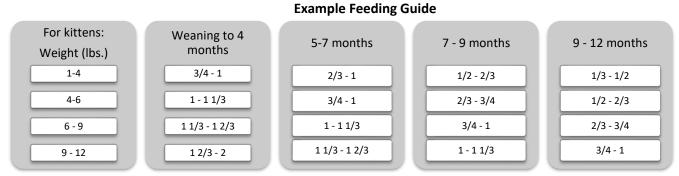
#### Snacks and Treats

- Descriptive terms apply to snack and treat product names. For example, beef snacks would contain more beef than beef flavored snacks.
- A guaranteed analysis is required for crude protein, crude fat, crude fiber and moisture.
- Treats and snacks are not required to carry a statement of nutritional adequacy from AAFCO, but the product must be clearly labeled as a snack or treat.
- Treats and snacks are not required to include feeding or use directions, but the product must be clearly labeled as a snack or treat.

### USE DIRECTIONS OR FEEDING INSTRUCTIONS

(REFERENCE WIS. ADMIN. CODE §ATCP 42.38)

Feeding instructions shall be appropriate for the life stages and intent of the food. In other words, the feeding directions must be adequate for a consumer to safely use the food. Include any precautionary statements which are appropriate for the safe feeding of the dog or cat food.



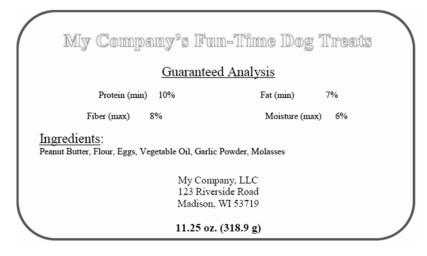
For pregnant or nursing adult cats, we recommend free choice-feeding. Some cats may require more or less food, depending on activity level and other factors.

#### LABEL CLAIMS, PICTURES

(REFERENCE WIS. ADMIN. CODE §ATCP 42.44)

- Any other claim or photo on the label is prohibited from being false, deceptive, or misleading.
- Only drugs can be used to lessen the effects of a disease or medical condition. For example, "eases joint pain," or "reduces hyperactivity," are both claims that are indicative of a drug and not allowed on a dog or cat food label unless approved by the Federal Food & Drug Administration (FDA) as a New Animal Drug.
- Any nutritive claim, "enriched with vitamins and minerals," for example, will require additional nutritive guarantees in the guaranteed analysis.

#### **EXAMPLE FULL LABELS**



REAR DISPLAY PANEL

#### FRONT DISPLAY PANEL

## GOURMET DOG TREATS **GUARANTEED ANALYSIS: CRUDE PROTEIN (mln)** 60% CRUDE FAT (min) CRUDE FIBER (max) 10% 3% MOISTURE (max) 18% INGREDIENTS: Chicken meal, chicken breast, soy protein, com starch, chicken liver, potassium Sorbate (a preservative), flax seed oil FEEDING GUIDELINES: Give to dog as a reward. Do not give more than 3 treats per day to dogs under 50 lbs or more than 5 treats per day to dogs 50lbs and over. Not a complete diet. Provide plenty of Net Weight 3.5 oz (99 grams) fresh water.

If you have pet food labeling questions, please contact the Feed Specialist 608-224-4539 or <u>datcpfeed@wisconsin.gov</u>. Rev. 5/2018