



AAFCO
Association of American Feed Control Officials

The Association of American Feed Control Officials

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Executive Director

Animal Food Regulation in the US



Regulation of Animal Food in the US



Federally

Food Drug & Cosmetic Act
Food Safety Modernization Act



State by State



Integrated Food Safety System (IFSS)

AAFCO & FDA



Since the very first meeting in 1909 the federal government has been present at AAFCO meetings.



FDA representatives participate on AAFCO committees, providing scientific and technical advice



FDA is a member of AAFCO and serves in a non-voting advisory role on the AAFCO Board of Directors



FDA provides valuable scientific advice that many state feed control officials rely on when making decisions



AAFCO
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Who is the “Association of American
Feed Control Officials?”

AAFCO History

- AAFCO was formed in the fall of 1909 at the conclusion of the second American Feed Manufacturers Association meeting in Washington, DC.
- AFMA appointed a committee of control officials and industry representatives to study inspection and enforcement matters and report back.
- At the conclusion of this meeting, Dr. E.B. Voorhees of the New Jersey Agriculture Experiment Station requested that control officials remain for a follow up meeting



In the Early Years of the Association. Left to Right, Back Row: J. D. Turner, P. H. Smith and W. J. Jones, Jr.; Front Row: B. L. Purcell and L. F. Brown.
— Loaned by Mrs. Turner

Original Purpose

- Dr. Voorhees encouraged regulators to provide industry with a general consensus of the regulatory community.
- Control officials agreed that a uniform law, along with fair and equitable definitions, regulations and resolutions, was needed for consistency and uniformity.



AAFCO Today



AAFCO is a voluntary membership organization of the states in the US and Federal government, as well as government agencies in other countries, responsible for the execution of laws and regulations pertaining to the production, labeling, distribution, use, or sale of animal feed and feed ingredients.



AAFCO provides a forum where control officials, industry representatives, and consumers can:

Meet in partnership to discuss problems in administering and enforcing state feed laws

Meet to identify and discuss emerging issues across the country

Study problems, develop strategies, and

Provide guidance and outreach

Association Work



Model Bill &
Regulations



Guidance



Advocacy



Dog/Cat
Nutritional
Standards



Proficiency Testing
Program



Training



AAFCO Official
Publication

Different States, One Model



“Commercial Feed”

- Means all materials or combination of materials which are distributed or intended for distribution for use as feed or for mixing in feed, unless such material is specifically exempt.



State Regulatory Work

- Sample Collection
- State Laboratories
 - Quality
 - Safety
- Inspections
- Enforcement/Compliance
- Recall Activities
- Label Review



Labeling Information & Claims

- Federal Labeling Requirements (21 CFR Part 501)
 - Name, Ingredients, Company name & address, Quantity statement
- Naming Rules – AAFCO PF3
 - 100% rule
 - 95% rule
 - 25% rule
 - 3% or “with” rule
- Ingredients
- Nutritional guarantees
- Health claims



Labeling Claims Continued

- Quality Claims

- “Human Grade” – AAFCO OP p.157

- Only acceptable to the product as a whole
 - 21 CFR Part 117 and those applicable federal human food laws as required by ingredient, process and/or facility type.
 - First and foremost, animal food products subject to 21 CFR Part 507

- “Natural” – AAFCO OP p.157 & p.364

- Only acceptable to the product as a whole when all of the ingredients and components of ingredients meet the definition
 - False and misleading if any chemically synthesized ingredients are present in the product

Pet Food Label Modernization



PFLM Background

- The process began in 2015
 - Consumers were asking for more transparency and labels that were easier to understand
 - There was a desire for pet food labels to look more like their human food counterparts.
 - People want to know what they are feeding their pets
- This led to 8 years' worth of work and thousands of dollars invested into multiple rounds of consumer research
 - 2018 – helped guide product of the workgroups
 - 2019 – confirmed work was on the right path
 - 2022 – reaffirmed that consumers understood the proposed changes

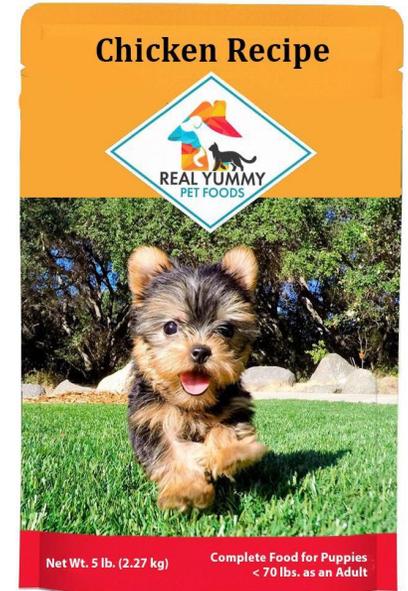
Background Continued...

- 4 collaborative workgroups
 - Handling & Storage Instructions
 - A Nutrition Facts Box
 - The Ingredient Statement section
 - Intended Use Statement
- Public Comment Period
- Main goal – “how can we better communicate information through a label”

Major Changes

- Intended Use
- Pet Nutrition Facts Box
- Ingredient Statement updates
- Voluntary Safe Handling statements

www.aafco.org/pflm



Previous Label Example



Calorie Statement

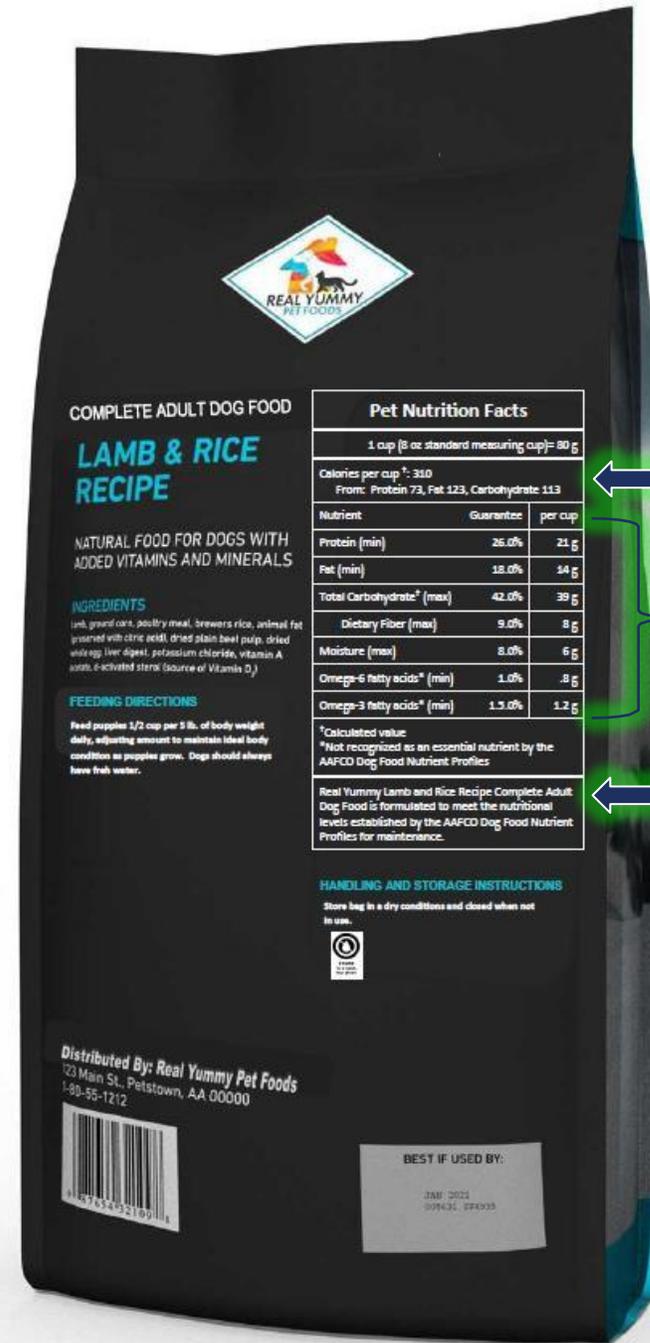
Guaranteed Analysis

Nutritional Adequacy

These 3 sections are now required to be in the Nutrition Facts Box in the same size, color and print type.

These 3 Sections could previously have been located anywhere on the package – back, side gusset, and in different size, color, and print type.

Modernized Label Example



Calorie Statement

Nutrient Guarantees

Nutritional Adequacy

<h1 style="text-align: center;">Pet Nutrition Facts</h1>		
1 cup (8 oz standard measuring cup) = 80 g		
Calories per cup [†] : 309 From: Protein 73, Fat 123, Carbohydrate 113		
Nutrients	Guaranteed	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
Omega-3 fatty acids* (max)	1.0%	0.8 g
Omega-6 fatty acids* (min)	1.5%	1.2 g
[†] calculated value * Not recognized as an essential nutrient by the AAFCO Dog Food Nutrient Profiles		
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.		

Key Changes

Note the addition of 2 **new required guarantees**:

- **Total carbohydrate** is a calculated value that is new to add to the label
 - $[100 - (\text{Crude Protein} + \text{Crude Fat} + \text{Moisture} + \text{Ash})]$;
 - Note the required declaration for calculated values
- **Dietary fiber** is a new analysis replacing crude fiber
 - AOAC 991.43
 - Note: Crude fiber analysis is still needed to calculate

Note: Total Calories calculations can be found in PF5(a)(3)A.iii

Pet Nutrition Facts		
1 cup (8 oz standard measuring cup)= 80 g		
Calories per cup [†] : 310 From: Protein 73, Fat 123, Carbohydrate 113		
Nutrients	Guaranteed	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.		

Handling and Storage Instructions (PF12)

- A voluntary statement.
- 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, the accompanying text must be included.
- The graphics are available on the AAFCO website.



Modernized Label Example



Implementation

- Goal is 6 years from the 1/24 OP print date.
- AAFCO and trade associations to conduct status reviews throughout.
- NASDA Action Item
- During year 5 the status review at the Annual 2029 meeting will include an evaluation of the recommended discretionary period.



AAFCO Recommended Position on Regulatory Discretion for Pet Food Label Modernization Changes

AAFCO recommends state regulatory feed programs work with the pet food manufacturers and distributors within their state to set a goal of achieving full implementation with the PFLM regulation changes within 6 years from the date of the printed Official Publication. (January 2024)

By working with Industry stakeholders as well as associations representing pet food manufacturers and distributors, we have collectively identified the following potential challenges that, depending on circumstances out of routine control, could prevent parties from meeting the established implementation goal of 6 years. While the following list identifies the challenges we agree are likely, we also encourage state regulatory programs to maintain an open communication with the manufacturers/distributors in their state to address those issues that were unforeseen.

1. Total dietary fiber complexities including, but not limited to methodology alignment, increased testing to build robust data sets, and internal instrumentation processes and procurement.
2. Software development/modifications related to applications utilized by industry for go to market activities to include label development, formulation development, website/e-commerce, etc.
3. Access to support services provided by both internal and external vendors, to include design, printing, packaging, lab analysis, etc.

AAFCO and its industry stakeholders have worked together tirelessly since 2015 to develop these model regulations. Successful implementation of these label modernizations will take the same cooperative effort. AAFCO and our trade association partners are committed to the completion and success of this project and have agreed to conduct status reviews throughout the implementation process. The reviews will be requested 60 days before the AAFCO Annual meeting. Comments will be requested from both regulators and Industry. These reviews will include sharing of status, things that have gone well, things that have been delayed and identifying any new unforeseen challenges. The report on these reviews will be given during the Pet Food Committee meeting. During year 5 the status review at the Annual 2029 will include an evaluation of the length of the recommended discretionary period. AAFCO recommends that state programs participate with AAFCO throughout this process and follow these guiding principles as they work with pet food industry within their state.

Ingredient Approvals



MOU 225-07-7001 Update



AAFCO and FDA had a formal Memorandum Of Understanding (MOU) in place for 17 years



Expired Oct. 1, 2024



New FDA Changes

GFI# 293

GFI# 294



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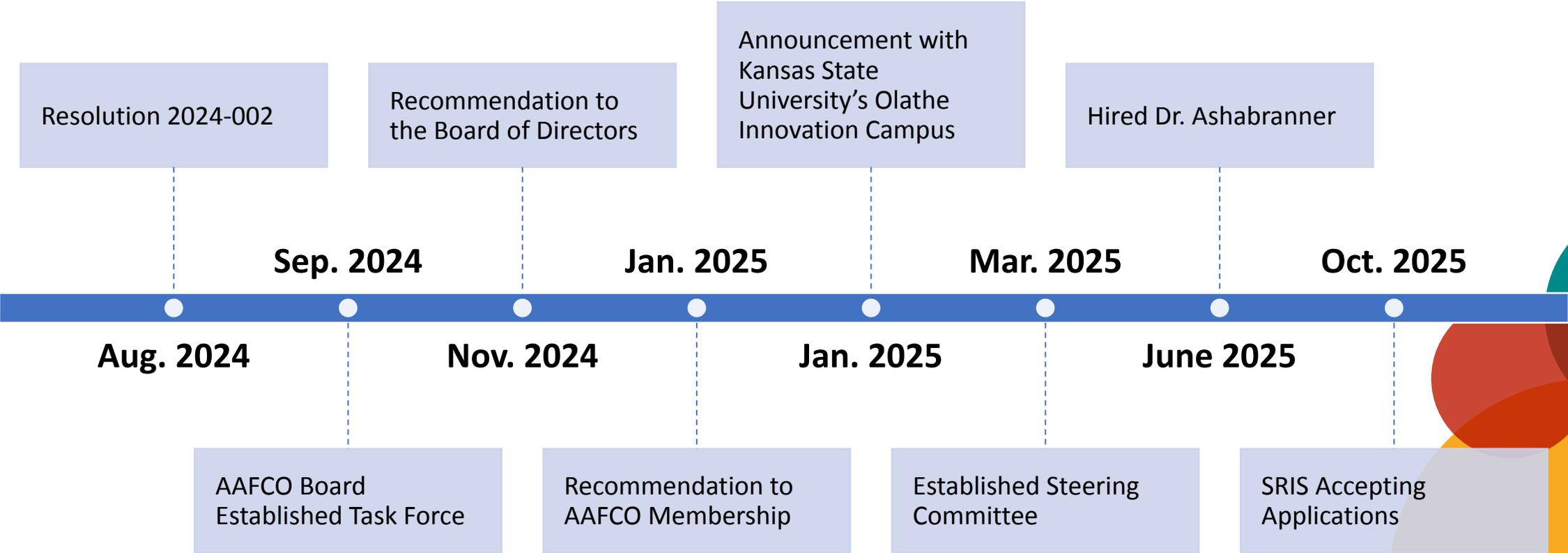


K-STATE
OLATHE

Scientific Review of Ingredient Submissions

A state government-higher education collaboration that provides fast, yet accurate scientific review of new animal food ingredients.

How did we get here?



A New Era of Collaboration on Ingredients



SRIS's state government and higher education partnership provides the flexibility and timeliness that industry needs to drive innovation.



The SRIS network of SME's is diverse, and uniquely qualified to meet the demands of industry and regulators.



SRIS will uphold rigorous safety and scientific standards, while meeting the industry's demand for timely review of new ingredients.

Current Events

Current Events

- Innovative FEED Act. (119th Congress – S.1906/H.R.2203)
 - This bill would amend the Federal Food, Drug and Cosmetic Act to establish a new category of animal food additives that do not contribute to animal nutrition, but rather, act in the animal's gut to provide health benefits, reduce emissions or address human food safety concerns.
 - FDA withdrew PPM 1240.3605 in May 2024
- Poultry Act of 2025 (H.R.597 & H.R. 4121)
- FDA HPAI Update – January 17, 2025
 - Applicable to manufacturers of dog and cat food that use uncooked poultry or cattle material.
- FDA Staffing Updates – ongoing
- GRAS Reform discussions - ongoing

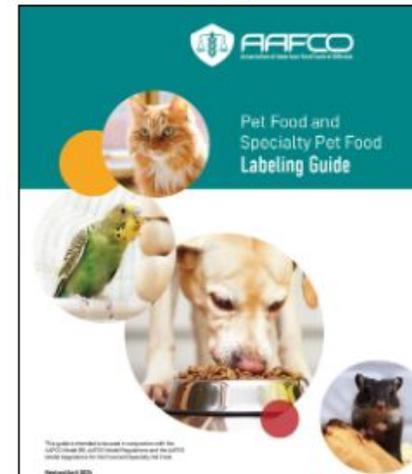
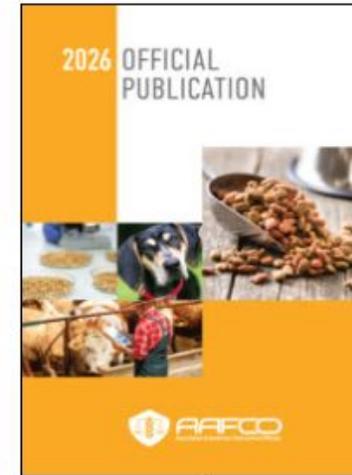
Concluding Thoughts

- U.S. regulators have had oversight over animal food products for 120 years
- Federal and state regulators work cooperatively to ensure that U.S. livestock producers and pet owners have access to the highest quality products on the market
- Through AAFCO & different trade associations there is access to participate in the process to make sure your voice is heard and your views are represented.
- Regulators want to oversee a process that protects consumers and the industry from bad actors, while simultaneously promoting and innovation and research.

Additional Resources

- AAFCO Official Publication
- AAFCO Pet Food & Feed Labeling Guides
- AVA (AAFCO Virtual Assistant)

<https://www.aafco.org/resources/publications/>





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2026 ANNUAL MEETING

— August 26-28, 2026 | San Diego

MEDICATED FEED LABELING WORKSHOP
August 25, 2026



AAFCO

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Thank you
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