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Pet Food Labels:

What Reading a Label Will and Won't Tell You About the Food

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Pet food regulation varies a great deal from country to country. The purpose of this presentation is not to review all of the similarities and differences of these regulations as they pertain to pet food labels, but rather to illuminate what information is generally available on a label and what it will and won't tell you about the food contained within the packaging. In general, however, a pet food label is the primary means of communicating product information between the manufacturer of the product and the consumer (although in the case of pet foods, the actual consumer of the product rarely has any interest in the product's packaging). There is, in fact, a good deal of information that can be gleaned from many pet food labels. However, the answers to the most burning consumer questions about quality of the product and appropriate quantity to feed a specific pet are still difficult to answer using label information alone in the majority of cases.

Labels are generally divided into two basic components: 1) the principal display panel and 2) the information panel (also known as the statutory statement in Europe). The principal display panel is the part of a label that faces the consumer on the store shelf. It often contains information and illustrations intended to attract the attention of prospective buyers. As far as regulations go, however, very little information is required. There must be a product name, a designator (to identify the product as intended for animals as opposed to humans), and a net weight. Even these simple requirements vary from country to country (e.g., net weight is part of the statutory statement in the EU and Canada does not require a designator). One useful bit of information for consumers is to have a basic understanding of percentage rules. While the specific percentage may vary, in general, for countries that have regulations governing the naming of products, the rules work as follows. Products named as a sole ingredient, e.g., Tuna, contain the most of that ingredient (70-100%, excluding additives). Products that have a modifier added to the ingredient name, e.g., Tuna Dinner or Tuna Feast, contain 10-70% of that ingredient. Products named using the term "with" (e.g., With Tuna) contain 3-10% of the named ingredient. Products named with the term flavor (e.g., Tuna Flavor) often contain significantly less than 3%.

The information panel or statutory statement contains somewhat more useful information for establishing the purpose and quality of a food. In general, this part of the label will include an ingredient statement, a guaranteed analysis, a nutritional adequacy statement, feeding guidelines, and information about the identity of the manufacturer or distributor of the food. The ingredient statement is often scrutinized by the consumer. There are numerous concerns, beliefs, and myths pertaining to pet food ingredients. Consumers will often make purchases based on the absence or presence of certain ingredients or the order

in which they appear on a label. Unfortunately, ingredient statements are often misleading, although not necessarily intentionally so. In many cases ingredients are regulated to be listed on the label by weight on an “as is” basis. Therefore, ingredients containing substantial amounts of water, for example meat, will be listed ahead of grains, even though on balance, the grain might contribute a greater percentage of the protein in the finished product. Some countries like the United States have detailed definitions of different ingredients, yet there can still be an extreme range in the quality (e.g., digestibility and bioavailability of nutrients) within any ingredient category. Other countries list ingredients by category (e.g., meat and animal derivatives, oils and fats, etc.) and do not specifically list the ingredients actually used in a particular product. There are already regulations appearing in some countries governing “risk materials” such as those of bovine origin and GMOs (genetically modified organisms). Regulations such as these are certain to become more common in the future.

The guaranteed analysis, depending on the country, gives information about the average content of the food or at least minimum and maximum values for certain key components such as protein, fat, and fiber. Since this is again reported on an “as is” basis, it is not possible for consumers to simply compare labels to make selections of foods based, for example, on protein or fat content. Unless two foods are identical in moisture, fat, and fiber content, “as is” comparisons can be inaccurate.

The nutritional adequacy statement is one of the most important parts of the label, because it is this statement that will tell the consumer the species and lifestage the product is intended for and whether the food is a complete diet or meant to be a complementary product. Some countries take this statement further and require the standard used for designating a product complete to be stated. The Association of American Feed Control Officials (AAFCO) is a nonregulatory body in the United States composed of state and federal regulators who develop model legislation for member states to use (pet foods are regulated at the point of sale in the United States, which means on a state-by-state basis). AAFCO permits pet food manufacturers a choice of methods for proving the nutritional adequacy of their products. The first method is by calculation. Using information on the nutrient content of the ingredients (from food composition tables), the manufacturer shows that the product meets established nutrient guidelines. The second method is by analysis. The manufacturer analyses the finished product and shows that it meets established nutrient guidelines. Finally, the manufacturer can run feeding trials. AAFCO has devised protocols for feeding trials for gestation/lactation, growth, and maintenance. The criteria for adequacy include growth rate, development, clinical health, hematological responses, and reproductive/lactation performance. Obviously, the feeding trial method is the most stringent and biologically relevant method for showing nutritional adequacy. It is also the most expensive.

It is important to recognize that under the current regulations a company does not have to run feeding trials on each individual product in order to be able to claim nutritional adequacy through feeding trials on the product label. The regulations allow a manufacturer to have product “families” from which only one product, the “lead” member of the family, is tested. Currently, there are no regulations that stipulate the

criteria for including a product in one or another family, although such regulations are currently in development.

While Canada does not require a nutrition adequacy statement on pet food labels, the Canadian Veterinary Medical Association (CVMA) has developed a voluntary program for certification of pet foods. The CVMA goes beyond the AAFCO regulations in not only stipulating protocols for feeding trials, but also protocols for digestibility feeding trials. Finally, the EU does require nutrition adequacy statements on pet food labels, but leaves the criteria for what constitutes “complete and balanced” up to the manufacturer.

Feeding guidelines are generally required on pet food labels, but can vary greatly in detail. In addition, there are no standards for what constitutes adequate intake for different species and lifestyles. Currently, it is up to the manufacturer to develop their own guidelines.

Depending again upon the country, there are a few additional useful pieces of information that may appear on a pet food label. Many manufacturers today give telephone numbers or websites for consumer information in addition to manufacturer’s or distributor’s names and addresses. Most products are imprinted with batch information giving precise information about the time and location of manufacture. The EU requires a “best used by” date. This information is found on a growing number of pet food labels in North America as well, although it is not required as of yet. And, in the United States, it has recently become permissible to state calorie information on the label although this is still prohibited in the EU.

Despite an effort in many countries to regulate pet food labels so that they provide accurate information, many questions of concern to the consumer still go unanswered. Many labels currently do not provide easily accessible information about nutrient content, caloric density, quality and identity of ingredients (including slaughter practices and presence of GMOs), bioavailability of nutrients, standards of nutritional adequacy, freshness and stability, and, something not touched on yet in this discussion, quality assurance practices in manufacturing. Until such time that the labeling laws are modified in a way that is not misleading, the burden will be on the veterinarian and the informed consumer to investigate the nutritional claims made by any given pet food. Table 1 has list of criteria that I consider when I evaluate a food that I am unfamiliar with. As I practice in the United States, some of these criteria apply specifically to pet food regulations found there. However, these criteria should be easily adapted to any setting. In the end, my rule is the proof of the pudding is in the eating. For that reason, it is important to ask your clients what foods they are feeding and to note the condition of their pets. While it is not exactly a scientific trial, you will soon acquire a list of foods that seem to perform well and another that you may council clients to avoid.

TABLE 1: Things to Consider When Evaluating a Pet Food

1. Is the nutritional adequacy statement based on feeding trials?

2. Is there a phone number on the label for consumer inquiries?

If the answer is no to either of the above questions, I would be disinclined to use the food. If the answer were yes to both questions, then I would call the phone number and make the following inquiries:

1. Does the company run AFFCO feeding trials on each of their products or product families?

2. Does the company have their own manufacturing plants or do they contract with an outside feed mill or manufacturing plant?

3. Does the company have an R and D department?

4. Where does the company get their raw ingredients? Are they from established sources or do the sources vary? What kind of standards does the company have for raw ingredients? Do they do any testing in-house before using an ingredient for manufacturing?

5. What kind of testing does the company do at the end of each run? Do they hold the product for shipment until this testing is completed?

6. Does the company do stability testing of their products? Do they know the shelf life of their product? Do they put "Best Used By" dates on their product?

Finally, I look at any promotional material that is available for the product (including the packaging) and evaluate how the product is marketed. Are they basing their marketing claims on a sound scientific rationale? Is the marketing based on a gimmick? Does the company market their product by bad-mouthing other companies?